

**On Time Public Comment List**  
**Statewide Finfish and Supplemental Issues Meeting**  
**March 19- 24, 2013**

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***Southeast Alaska Subsistence  
Regional Advisory Council***

**Bertrand Adams Sr., Chair  
P. O. Box 349  
Yakutat, AK 99689**

*kaadashan@alaska.net*

October 9, 2012

RAC SE12016.RL

Mr. Karl Johnstone  
Chair, Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811

Dear Mr. Johnstone:

The Southeast Alaska Subsistence Regional Advisory Council, met in Sitka September 26-28, 2012. At that meeting, the Council considered a proposal from the Sitka Tribe of Alaska to close Federal public marine waters near Mahknati Island to non-subsistence uses. The Council did not support that proposal, partly based on the action by the State Board of Fisheries to close nearby areas to commercial fishing. However, the Council is concerned for the overall health and management of herring stocks in this region.

The Council supports the Agenda Change Request to add herring to the list of species in the State's Forage Fish Management Plan. Herring are clearly the most important forage fish in this region and should be included in the plan. The Council is not opposed to commercial fisheries where appropriate and is supportive of accurate stock assessments and formulation of management plans formed through collaboration with all the stakeholders.

Please address any questions regarding this request either directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, AK 99833, 1-907-772-5930, robertlarson@fs.fed.us.

Sincerely,

Bertrand Adams Sr., Chair

**Karl Johnstone**

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**Oct. 09, 2012**

**cc: Peter J. Probasco, Office of Subsistence Management  
Beth Pendleton, Forest Service Regional Forester  
Interagency Staff Committee**



March 4, 2013

Alaska Board of Fisheries  
Board Support Section, ADFG  
ATTN: Monica Wellard  
PO Box 115526  
Juneau, AK 99811-5526

**Delivered via FAX: 907-465-6094**

RE: KRSA comments on the 2013 Board of Fisheries (BOF) Statewide Finfish Proposals

Dear Board Chair Johnstone and members of the Board of Fisheries:

Kenai River Sportfishing Association (KRSA) submits the following public comments regarding the 2013 BOF Statewide Finfish meeting to be held in Anchorage March 19 – 24, 2013.

**Proposal #216 – Support.** A complex multitude of codified management plans now govern the salmon fisheries in the State of Alaska and elements of one plan, on occasion, conflict with elements found in another. Most of the state’s major salmon fisheries are mixed stock fisheries in nature and harvest salmon bound for more than one major river system and often more than one regulatory region. Upper Cook Inlet is acknowledged to be one of the more complex systems in the state but certainly not the only complex system, others include Lower Yukon, Lower Kuskokwim, Bristol Bay, False Pass, Alitak Bay, Shelikof Straits, Prince William Sound, Cape Fairweather and all of Southeast Alaska.

During its meeting on Upper Cook Inlet in 2008, to address the occasions when achieving the management objectives or implementing the prescriptive tools of one management plan conflicts with or compromises the Department’s ability to achieve the objectives of another plan, AT THE DEPARTMENT’S REQUEST, the Board adopted specific regulatory language. This language authorizes the Department to step outside of the codified plans temporarily in an effort to achieve escapement goals. The basic concept embodied in the regulatory language has proved constructive and should be adopted statewide with the minor modifications that we suggest.

Simply stated, achievement of established escapement goals can be enhanced by adoption of this proposal. The Upper Cook Inlet Area supports not the only complex mixed stock fishery in



the state. KRSA does not know why the Department has not advocated for this re language statewide.

Our suggested regulatory language would be, “Notwithstanding any other provision found within the Chapters of Title 5, it is the intent of the board that, while in most circumstances the department will adhere to the management plans and utilize, to the extent practicable, all prescriptive elements found in the codified plans, no provision within a specific management plan is intended to limit the commissioner’s use of emergency order authority under AS 16.05.060; to achieve established escapement goals for the management plans as the primary management objective. For the purpose of the subsection, ‘escapement goals’ includes biological escapement goal, sustainable escapement goal, and optimal escapement goal as defined in 5 AAC 39.222.”

KRSA could have suggested the exact language found in 5 AAC 21.363 (e) but we believe that two modifications improve the utility of the regulation. The first modification is to drop “in-river” goal from the list of escapement goals found in the Upper Cook Inlet language since in-river goals are allocative in nature and the Department should not be put in the position of trying to favor one allocation strategy over another without consultation with the Board. The second modification requires the Department to utilize, to the extent practicable, all prescriptive elements found in codified plans prior to going outside of the codified plans to achieve established escapement goals. The Department should be required to use the tools spelled out in prescriptive plans and not normally go outside the plans until all tools are utilized. KRSA believes that each of these modifications is constructive.

**Proposal 215 – Recommend no action.** This proposal seeks to address the allocation of salmon among commercial users in Resurrection Bay. It is better to deal with proposals of this type in the region, in cycle.

**Proposal 217 – Recommend no action.** This proposal seeks to establish a policy mandating a statewide priority meeting escapement objectives for king salmon. KRSA believes that this issue is best addressed regionally in compliance with the Policy for Management of Sustainable Salmon Fisheries (PMSSF).

**Proposal 218 – Recommend no action.** This proposal seeks to amend the PMSSF to require the establishment of a Sustainable Escapement Threshold for all salmon stocks listed as a yield or management concern. KRSA believes that this is well meaning but not realistically implementable.

**Proposal 219 – Recommend no action.** This proposal seeks to add definitions, most of which are currently in the PMSSF, to the definitions section of the codified regulations. KRSA sees this as marginally constructive but largely redundant and unnecessary.

**Proposal 222 – Support.** This Department of Public Safety proposal seeks to require proof of identification when attempting to sell fish at the request of a peace officer.

**Proposal 226 – Support.** This Department of Fish and Game proposal is basically “housekeeping” with respect to updating regulations for fishing shark.



**Proposal 227 – Support.** This Department of Fish and Game proposal, if adopted, the department EO authority to restrict Proxy fishing when also restricting all other sport fishing.

**Proposal 228 – Support.** This Department of Fish and Game proposal seeks to prohibit the practice of “high grading” fish within an individual’s sport catch.

**Proposal 231 – Support.** This Department of Fish and Game proposal seeks to define compensation for providing sport fish guiding services.

**Proposal 232 – Support.** This Department of Fish and Game proposal seeks to clarify the legal use of sport caught fish as bait.

**Proposal 233 – Support.** This proposal seeks to create an exemption to the ban on the use of felt soles for individuals who have disabilities. KRSA finds this a personal safety issue that can be addressed with no negative effects.

**Proposal 234 – Oppose.** This proposal seeks to ban lead weights in the sport fishery statewide in both fresh and saltwater.

**Proposal 235 – Oppose.** This proposal seeks to establish a mandatory reporting system for sport fisheries statewide. KRSA finds this type of proposal unnecessary, not focused upon any specific fishery issue, and certainly not a cost effective tool for management. If this proposal rises out of a regional issue then it should be addressed within that region, in cycle.

**Proposal 249 – Support discussion with substitute language.** See KRSA - PC on Proposal 249 BOF Statewide Finfish Attachments A, B, C and D.

## 2013 INTERIM MANAGEMENT PLAN CONCEPT - KENAI LATE-RUN KING SALMON



**Objectives:**

1. *Achieve spawning escapement consistent with ADFG recommendation, SEG range of 15,000 - 30,000<sup>a</sup>*
2. *Provide ADGF management with statistically significant and implementable trigger points*
3. *Retain management directives primarily for sport, minimize commercial harvest of late-run kings and maintain approximate historical distribution of harvest between in-river sport and set net fisheries*
4. *Share burden of conservation equitably across abundance strata with paired restrictions*

**Plan period:** June 25 – August 10

Step-down Pairings		Sport Fishery	Personal Use Fishery	East Side Set Net Commercial	Trigger
Normal		<ul style="list-style-type: none"> <li>Season of July 1-31, bait allowed, single hook</li> <li>Mouth to Skilak Lake open</li> <li>Seasonal limit two per year</li> <li>Saltwater normal</li> </ul>	<ul style="list-style-type: none"> <li>One king salmon per permit per year</li> </ul>	<ul style="list-style-type: none"> <li>Based on abundance as per late-run sockeye salmon management plan</li> <li>Managed to minimize harvest of late-run kings = Windows/EO hour stipulations</li> </ul>	Projecting escapements greater than 22,000 but less than 30,000
Precautionary zone	1	<ul style="list-style-type: none"> <li>No bait as a king salmon conservation measure (Reduction in harvest potential of about 50%, if implemented from start would reduce total harvest to approximately 4k)</li> <li>Middle River (or above Slikok Creek sanctuary) remains open to harvest July 15 - 30</li> <li>Saltwater restricted to south of Anchor River</li> </ul>	<ul style="list-style-type: none"> <li>No king salmon retention</li> </ul>	<ul style="list-style-type: none"> <li>Upper Subdistrict set gill net fishery limited to 24 hours per week, fishing by Emergency Order or Monday/Thursday</li> <li>Friday Window (36 hours) remains in place</li> <li>No use of Kasilof River Special Harvest Area (KRSHA)</li> <li>Step-down restrictions (1-3) remain in place through August 10<sup>b</sup></li> </ul>	Projecting escapements in the upper end of a range less than 22,000 but greater than 15,000
	2	<ul style="list-style-type: none"> <li>Catch and Release only fishing in the Kenai River</li> <li>Catch and Release mortality estimated at 2% of in-river return or no more than 300 fish if implemented early in an in-river return of 15,000 "true abundance"</li> <li>Saltwater restricted to offshore waters</li> </ul>	<ul style="list-style-type: none"> <li>No king salmon retention</li> </ul>	<ul style="list-style-type: none"> <li>Upper Subdistrict set gill net fishery further restricted in a manner to be developed by the set net participants with the objective of harvesting very few late-run king salmon using time, area and/or gear restrictions (through August 10)</li> <li>Friday Window (36 hour) remains in place</li> <li>No use of KRSHA</li> </ul>	Projecting escapements in the lower end of a range from 15,000 to 22,000
3		<ul style="list-style-type: none"> <li>No fishing for king salmon in Kenai River</li> <li>Saltwater restricted to offshore waters</li> </ul>	<ul style="list-style-type: none"> <li>No king salmon retention</li> </ul>	<ul style="list-style-type: none"> <li>East side set net fishery closed (through August 10)<sup>c</sup></li> <li>Drift Fleet restricted to off shore</li> <li>No use of KRSHA</li> </ul>	Projecting escapements less than 15,000





Step-up Pairings	Sport Fishery	Personal Use Fishery	East Side Set Net Commercial	
Normal	<ul style="list-style-type: none"> <li>Season of July 1-31, bait allowed, single hook</li> <li>Mouth to Skilak Lake open</li> <li>Seasonal Limit 2 per year</li> <li>Saltwater normal</li> </ul>	<ul style="list-style-type: none"> <li>One king salmon per permit per year</li> </ul>	<ul style="list-style-type: none"> <li>Based on abundance as per late-run sockeye salmon management plan</li> <li>Managed to minimize harvest of late-run kings = Windows/EO hour stipulations</li> </ul>	Projecting Escapements greater than 22,000 but less than 30,000
1	<ul style="list-style-type: none"> <li>Relax Normal restrictions including single hook restriction, closing date and seasonal limit</li> <li>Saltwater normal</li> </ul>	<ul style="list-style-type: none"> <li>Retention of one king salmon per permit allowed</li> </ul>	<ul style="list-style-type: none"> <li>Based on abundance as per late-run sockeye salmon management plan</li> <li>Managed to minimize harvest of late-run kings = Windows/EO hour stipulations<sup>d</sup></li> </ul>	Projecting escapements greater than 30,000

Footnotes:

<sup>a</sup> Consistent approaches by ADFG for Kenai and Kuskokwim kings would have produced a Kenai king SEG of 20,000 to 50,000.

<sup>b</sup> The step-down restrictions in place for the east side set net fishery on July 31 remain in effect through August 10 unless ADFG projects that the upper end of the escapement goal range for late-run Kenai River king salmon will be exceeded. For example, if bait is prohibited in the river on July 31 as a late-run king salmon conservation measure then the Kenai and Kasilof sections of Upper Subdistrict set gill net fishery would be limited to 24 hours per week through August 10, unless ADFG projects going above the upper end of the escapement goal.

<sup>c</sup> If established, Alternative Commercial Permits would be allowed to fish as per stipulations of the individual permit. Even during closure some permits (very small numbers of kings killed) may be fished.

<sup>d</sup> Windows/EO hour stipulations in late-run sockeye salmon management plan also act to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.



## Memorandum

**Date:** March 5, 2013  
**To:** *Kenai River Sportfishing Association*  
**From:** *Ray Beamesderfer, Senior Fish Scientist*  
**Subject:** *Technical Review of ADFG Kenai Late-Run King Escapement Goal Recommendations*<sup>1</sup>

### ASSESSMENT SUMMARY

- 1) **ADFG is effectively recommending a substantial reduction in escapement goals for late-run Kenai kings.**
  - a) *The new goal of 15,000 to 30,000 is obviously lower than the old goal of 17,800 to 35,700 on paper.*
  - b) *The new goal is even lower than the old goal in effect relative to the historical range of escapements.*
  - c) *The new goal will support substantial increases in exploitation rates relative to historical levels.*
  - d) *The impact of the new goal is clearly demonstrated by its effect on management in a low run size like that seen in 2012.*
  
- 2) **ADFG's selection of a sustainable escapement goal (SEG) involved both scientifically subjective and allocative decisions. Several different ranges could appropriately have been selected.**
  - a) *ADFG's lower goal (15,000) is well below any historical escapement where production has been estimated (26,550 in 1989). Establishing a goal outside the range of data is statistically questionable and contrary to standard ADFG practice.*
  - b) *Defining an SEG around maximum sustained yield (MSY) rather than maximum sustained production (MSP) or the normal definition of an SEG (a range that is known to provide sustained yield) is an allocative decision more properly in the purview of the Board of Fisheries.*
  - c) *Based on the Kenai data, any escapement range between 26,500 and 50,000 could reasonably be defined as an SEG under the definition in the Sustainable Salmon Fishery Policy.*

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<sup>1</sup> Fleishman, S. J., and T. R. McKinley. 2013. Run reconstruction, spawner-recruit analysis, and escapement goal recommendation for late-run Chinook salmon in the Kenai River. ADFG Report Fishery Manuscript Series 13-02.



**3) Recommendations are based on inferences and extrapolations from very limited data.**

- a) *Because historical escapement data were so poor, ADFG relied on complex statistical models to infer actual numbers. Escapement goals are based on the “best-fitting” model, but the data are messy and the best fit is not very good. Resulting confidence in estimates of escapement that produce maximum sustained yield or recruitment is low.*
- b) *Results of the analysis fail to corroborate past assertions that the TS split beam sonar was inflated by sockeye and did not provide an accurate index of in-river run in most years.*
- c) *Analyses are subject to a very high degree of uncertainty that is not reflected in the results due to many underlying, untested assumptions required by the series of complex models employed.*
- d) *Recommendations for even lower Didson-equivalent escapement numbers are particularly uncertain.*

**4) ADFG’s analysis underestimates risks of management for low escapement goals because it does not account for the imperfect ability of in-season management to determine actual run strength and control harvest accordingly.**

- a) *The ADFG analysis did not evaluate fishery management challenges and risks related to the new goals.*
- b) *Fishery implementation errors during low run years will inevitably result in lower escapement which will reduce future yields and prolong periods of low abundance.*
- c) *Goals provide little or no margin of safety for fishery management considerations.*

**5) Unless the Board of Fisheries adopts new restrictions on king salmon harvest at low runs, the goals will support a substantial increase in fishing rates on record low runs of Kenai kings during a period of declining abundance, uncertain future productivity, and failure of the historical stock assessment methodology.**



## SUMMARY OF ADFG ANALYSIS

### Objective

- ADFG’s objective was to conduct a comprehensive analysis of all relevant stock assessment data, summarize current estimates, and use this information as a basis for recommending an interim sustainable escapement goal (SEG).
- The analysis was focused on the relatively narrow scientific question of “what does the data tell us about the effects of escapement on future salmon returns?”

### ADFG’s SEG Recommendation

- A sustainable escapement goal range was identified about a model-derived estimate of escapement that produces maximum sustained yield.
- The range was based on escapements estimated to provide a high probability of achieving a high percentage of maximum sustained yield (MSY).

**Table 1. ADFG recommendation for revision of the Late-Run Kenai king escapement goal.**

	Type	Lower	Upper	Basis <sup>a</sup>
Current goal	SEG	17,800	35,700	Split beam sonar (TS)
ADFG recommendation	SEG	15,000	30,000	“True” abundance <sup>b</sup>
	--	11,700	23,400	Didson sonar equivalent <sup>c</sup>

<sup>a</sup> Escapement is estimated as sonar count minus harvest upstream from the sonar counter.

<sup>b</sup> Model-derived estimate by inference from a series of indicators.

<sup>c</sup> Didson is expanded by a factor of 1.28 to account for undetected Chinook passing the sonar site.

### Recent Escapement Relative to the New Goal

- ADFG’s recommended SEG would appear to have been met in each of the last four years (Table 2).
- In 2012, a harvestable surplus of 12,710 kings was estimated relative to the new goal.

**Table 2. Recent escapements relative to proposed minimum goals.**

Year	Total run <sup>a</sup>	Harvest < sonar	Didson	Harvest > sonar	Minimum Escape <sup>b</sup>	ADFG recommendation		
						Escapement <sup>ac</sup>	Min goal	Met?
2009	36,890	6,950	--	8,550	(16,711) <sup>c</sup>	21,390	15,000	Yes
2010	30,050	6,800	19,000	7,040	11,950	16,210	15,000	Yes
2011	35,780	8,690	21,036	7,410	13,626	19,680	15,000	Yes
2012	28,550	640	21,914	200	21,914	27,710	15,000	Yes

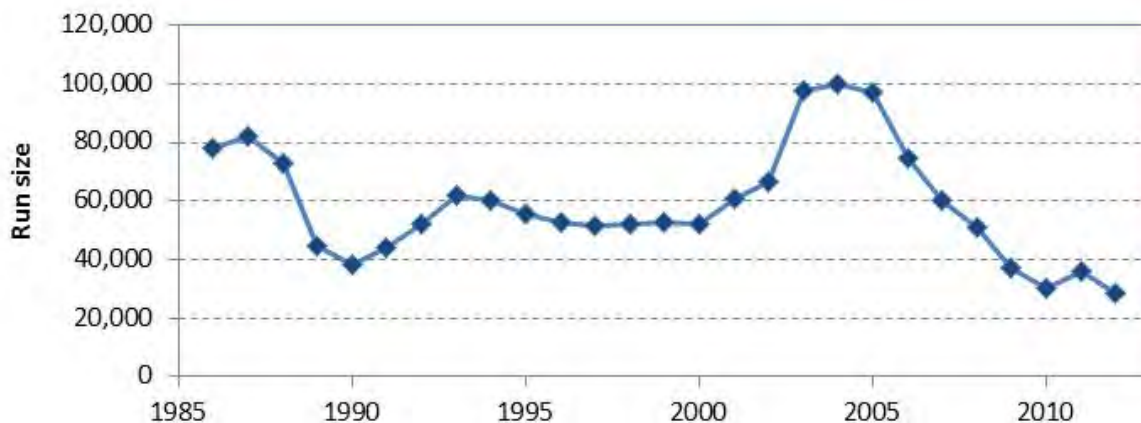
<sup>a</sup> based on ADFG model.

<sup>b</sup> Based on counts of actual fish in the Didson sonar minus harvest.

<sup>c</sup> Includes ADFG Didson expansion (1.28).

### **Methodology details**

- **Because no consistent, reliable, long-term estimates or indices of stock abundance are available**, the stock assessment relied on a complex series of models to make inferences among various estimates and indicators that were typically available for some years but not others.
- “True” abundance of the in-river return was derived from mark-recapture models in 1996-1997 based on telemetry and 2007-2011 based on genetic and other data.
- Estimates of “true” abundance in other years were inferred from the relationships between mark-recapture estimates and various run strength indicators in years with and without mark-recapture estimates.
- Run strength indicators included various catch per effort indices, net apportioned split beam sonar estimates, and split beam Echo Length Standard Deviation (ELSD) sonar estimates. Historical target strength estimates were not directly used but were incorporated into the net-apportioned split beam numbers estimated for a portion of the historical dataset. Similar data for all indicators was not available for all years.
- Estimates of “true” abundance were derived using a complex statistical model and advanced analytical simulation methods. Basically, this approach searched for and found the estimate of “true” abundance in each year that was most consistent with the various model inputs.
- Escapement and production estimates were derived from run reconstructions utilizing harvest and age composition data.
- A Ricker-type spawner-recruit curve was selected consistent with the data.
- A factor of 1.28 was also identified to expand Didson estimates to “true” abundance. This is purported to account for fish that did not swim through the Didson beam.



**Figure 1. Annual run size of late-run Kenai kings estimated by Fleischman and McKinley (2013).**

## ASSESSMENT

**1) ADFG is effectively recommending a substantial reduction in escapement goals for late-run Kenai kings.**

***a) The new goal of 15,000 to 30,000 is obviously lower than the old goal of 17,800 to 35,700 on paper.***

- i) Both the lower and upper ends of the new goal are 16% less than the old goal.
- ii) New and old escapement goals were both intended to represent actual numbers of fish according to the best available data at each time.
- iii) It has been suggested that the new and old goals cannot be compared or that the differences are unclear because of changes in the sonar measurement standard. This is false. The current model-derived and historical TS-sonar estimates of in-river run are in the same order of magnitude. Median values are 47,400 for the model and 43,200 for the TS sonar for the years where both are available.
- iv) The revised escapement goal report makes no attempt to compare the new and old goals which is a perplexing omission given the importance of the fish stock and the potential management implications of the proposed change.

***b) The new goal is even lower than the old goal in effect relative to the historical range of escapements.***

- i) The upper end of the new goal (30,000) is less than the historical median (32,500).
- ii) The mid-point of the new goal (22,500) is less than the historical 10<sup>th</sup> percentile value (24,500)
- iii) The lower end of the new goal (15,000) is less than the historical record low (16,210 in 2010).

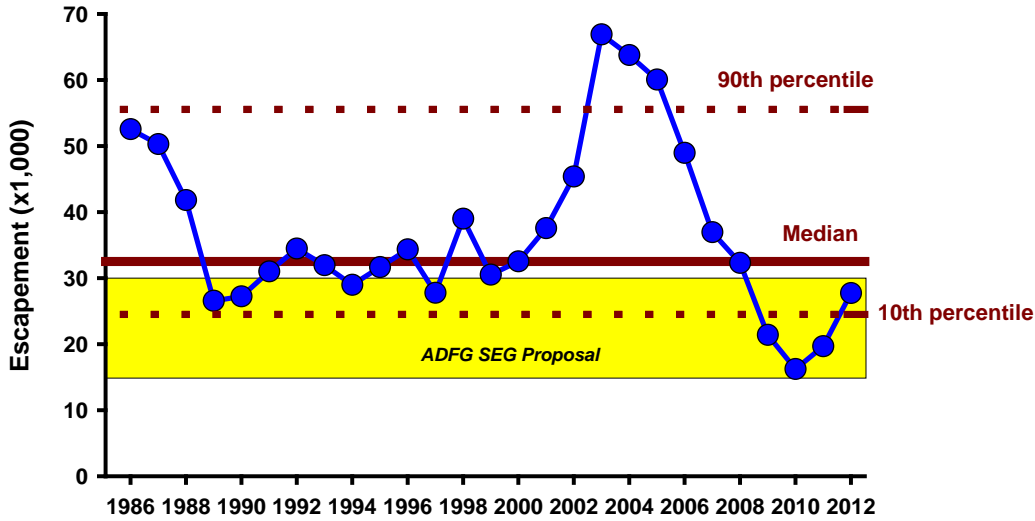


Figure 2. Comparison of ADFG proposal and historical escapement distribution.

**c) The new goal will support substantial increases in exploitation rates relative to historical levels.**

- i) The average exploitation rate consistent with the new escapement goals substantially exceeds the maximum rate in any of the last thirty years.
- ii) Historical exploitation rates in combined commercial, personal use and sport fisheries averaged 39% per year from 1986-2012 (Figure 3).
- iii) The maximum historical rate was 53%. In only three of 27 years, did the rate reach or exceed 50%.
- iv) The exploitation rate at MSY in the Department’s new stock recruitment model is 62% (Figure 4).
- v) Even higher exploitation rates (68%) are consistent with the lower end of the proposed escapement goal range (15,000).

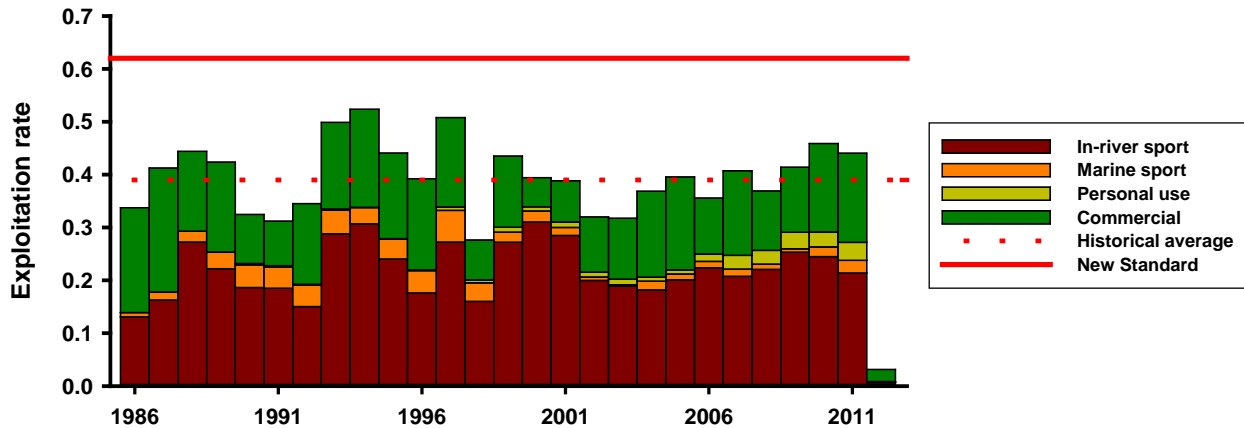


Figure 3. Annual exploitation rate of late-run Kenai kings derived from run size and escapement.



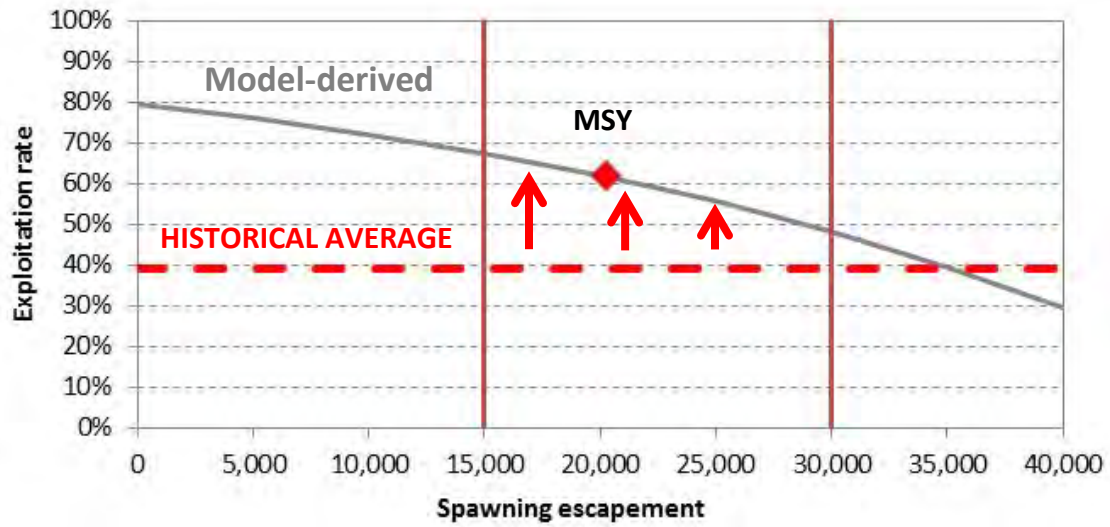


Figure 4. Comparison of average exploitation rates consistent with the revised escapement goals with the long-term historical average.

**d) The impact of the new goal is clearly demonstrated by its effect on management in a low run size like that seen in 2012.**

- i) In 2012, low run strength indicators for late-run Kenai kings coupled with widespread poor king returns throughout most of Alaska triggered restriction and then closure of the east side set net commercial fishery and the Kenai sport fishery in order to ensure that the old standard was met.
- ii) Post-season analyses with the new model estimated a total run size of 28,550 and an escapement of 27,910.
- iii) Under the new standard, the 2012 closures would have been unnecessary.

**2) ADFG’s selection of a sustainable escapement goal (SEG) involved both scientifically subjective and allocative decisions. Several different ranges could appropriately have been selected.**

**a) ADFG’s lower goal (15,000) is well below any historical escapement where production has been estimated (26,550 in 1989). Establishing a goal outside the range of data is statistically questionable and contrary to standard ADFG practice.**

- i) Over two thirds of the new escapement goal range is outside the range of data.
- ii) The new lower goal of 15,000 is 11,550 fish lower than any escapement previously evaluated. The lowest escapement for which returns have been estimated was 26,550 in 1989. Smaller escapements were estimated in 2009-2011 but no return data is available from those escapements (Figure 5).
- iii) The model-derived estimate of the escapement that produces MSY (20,260) is 6,000 fish lower than any historical data point (Figure 6, Figure 7).

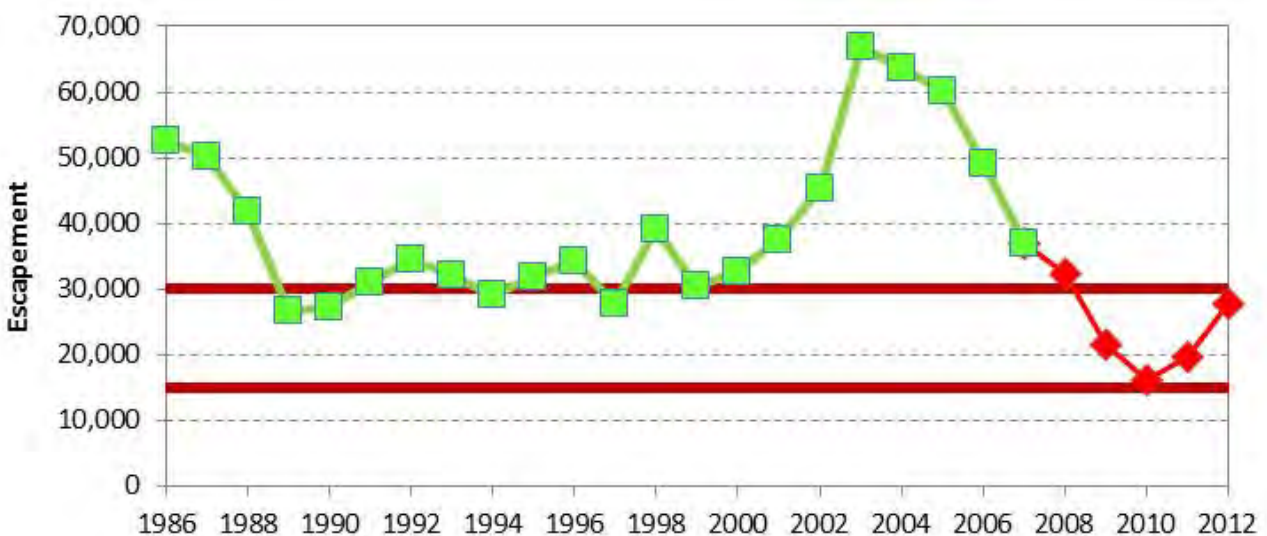


Figure 5. Model-derived escapement estimates for years with (green) and without (red) production estimates (relative to ADFG proposed escapement goal range of 15,000 to 30,000).

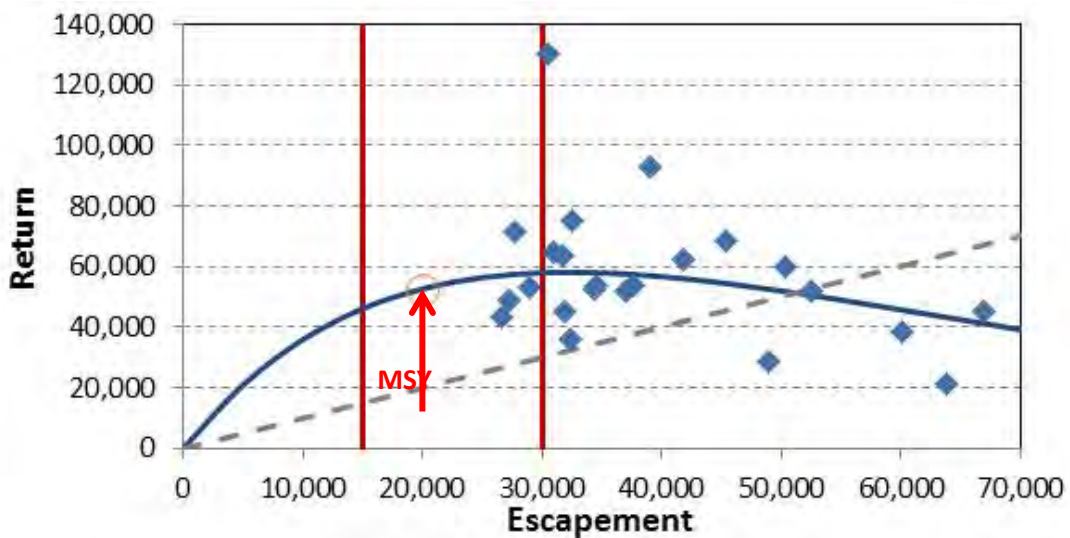


Figure 6. Plot of model-derived stock-recruitment data and the stock-recruitment function identified as the basis for new escapement goal recommendations.

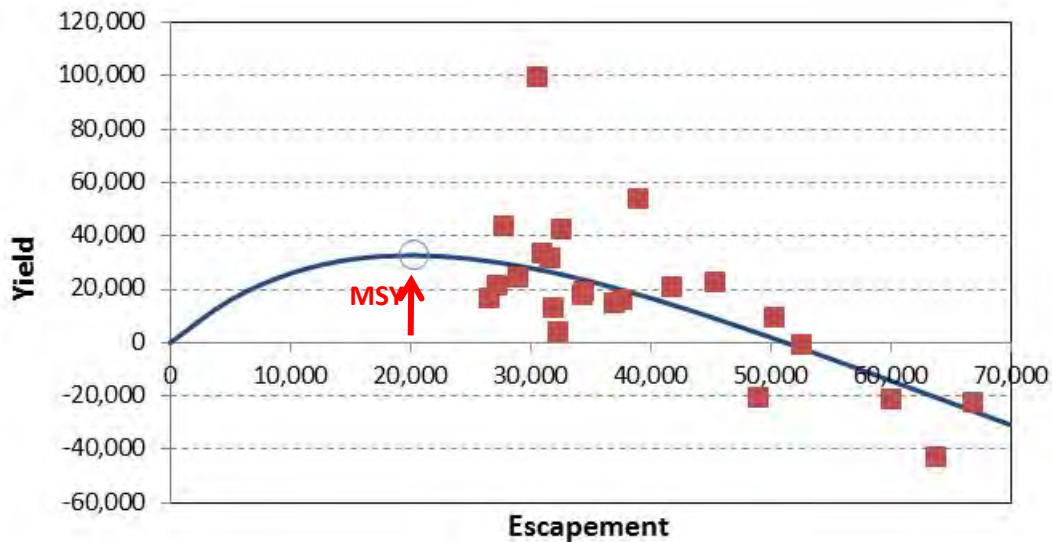


Figure 7. Plot of model-derived yield curve and the stock-recruitment function identified as the basis for the new escapement goal recommendation.

- iv) This peculiar result is an artifact of the model-fitting routine that infers the shape of the stock-recruitment curve at low escapements where no data exists, from the data within the historical escapement range.

- v) Extrapolation of regression results outside the range of the available data is highly uncertain at best and inappropriate at worst.<sup>2</sup> This uncertainty is not reflected in model-derived confidence intervals on parameters.
  - vi) Goals outside the range of data are also contrary to established practice. SEG-setting methodologies under the Sustainable Salmon Policy were standardized for Upper Cook Inlet by Bue and Hasbrouck in 2002.<sup>3</sup> They concluded that *“the SEG range should not include the lower 15% of the observed escapements to protect against setting the goal too low.”* Bue and Hasbrouck note that percentiles may be modified based on contrast in the escapement data: *“For stocks with high contrast and at least moderate exploitation, the lower end of the SEG range was increased to the 25<sup>th</sup> percentile as a precautionary measure for stock protection.”*
- b) Defining an SEG around maximum sustained yield (MSY) rather than maximum sustained production (MSP) or the normal definition of an SEG (a range that is known to provide sustained yield) is an allocative decision more properly in the purview of the Board of Fisheries.**
- i) The selected range based on MSY implicitly favors a commercial fishery priority for this stock which would appear to be contrary to the sport fishery management priority for Kenai River late run king salmon identified in 5 AAC 21.359(a).
  - ii) In most Alaska fisheries, goals based on MSY are reasonable because the fishery is primarily commercial. Commercial fishery value is related to yield measured in pounds of fish, and thus benefits from a MSY standard.
  - iii) SEGs selected based on maximum yield (MSY) or maximum recruitment (MAXR) have very different implications in other areas that support significant commercial, personal use and sport fisheries (Figure 8). Sport fishery value is related to catch per unit effort which is greatest under a maximum recruitment standard.
  - iv) Fishery priorities have been considered in establishing SEGs in other areas of Alaska. In the Kuskokwim for instance, ADFG has recommended an SEG range extending well above a simple MSY range based on the needs of the subsistence fishery.
  - v) Nothing says the SEG has to be established based on MSY. An SEG is simply a level of escapement known to provide for sustained yield. SEGs are used in situations where a Biological Escapement Goal (BEG) cannot be used or managed for.
  - vi) More typically, SEGs are not based on MSY at all. Where MSY is estimable, escapement goals are usually identified as BEGs. Although the Kenai analysis estimated MSY, the Department elected to define the MSY-based goal as a SEG rather than a BEG to due to the limitations of the existing data.

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<sup>2</sup> Chiang, C. L. 2003. *Statistical methods of analysis*. World Scientific ISBN 981-238-310-7. Steel, R. G., and J. H Torrie. 1980. *Principles and procedures of statistics*. McGraw-Hill, New York.

<sup>3</sup> *Escapement goal review for salmon stocks of Upper Cook Inlet*. ADFG Report to the Board of Fisheries.

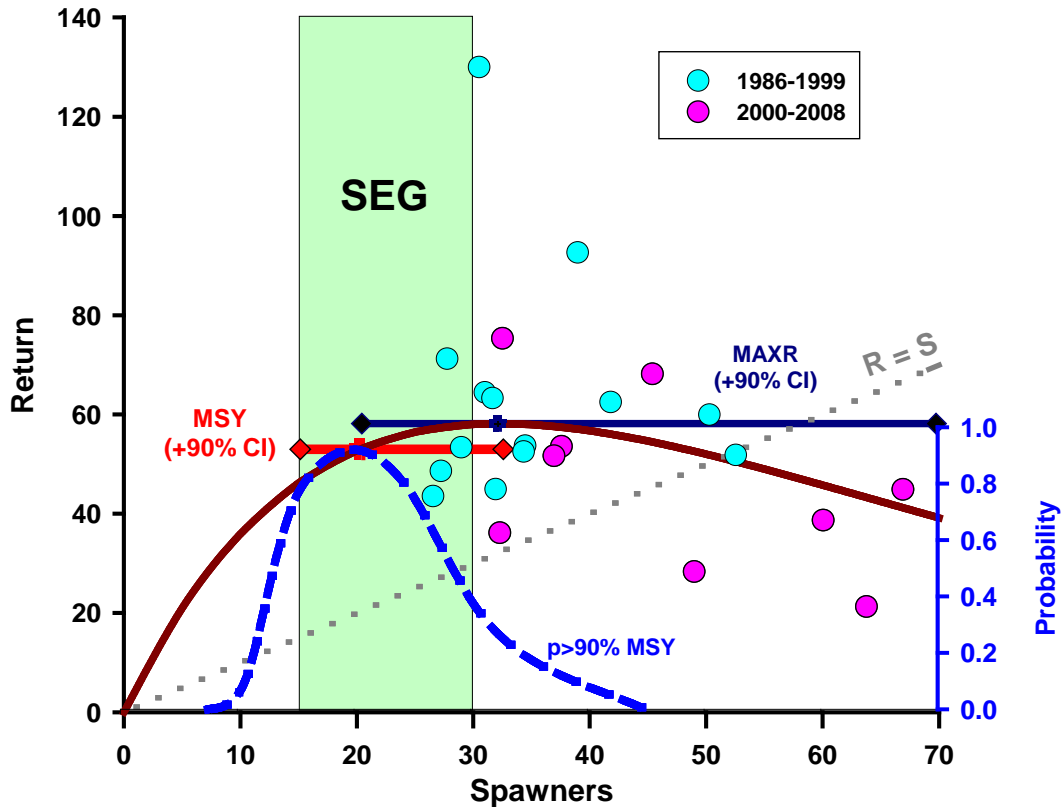


Figure 8. Escapement ranges (and 90% credibility intervals) consistent with maximum sustained yield (MSY) and maximum recruitment (MAXR) based on the stock-recruitment function identified as the basis for ADFG escapement goal recommendations (parameters from Fleischman and McKinley Table 5).

- viii) ADFG also selected a SEG that was not centered with respect to MSY probabilities or expected sustained yields. The decision to skew the SEG slightly higher was intended to provide a “small safety factor” to reduce risks in recognition of the lack of data from escapements below 26,550.
- ix) The “adjustment” was negligible from the standpoint of a MSY concern. The selected range is still approximately equivalent to the 90% credibility limits about the point estimate of escapement that produces MSY. (The CI’s are unbalanced because of the nonlinear shape of the spawner-recruit curve).
- x) A much more precautionary approach and outcome was taken by ADFG for Kuskokwim Chinook where the entire SEG was within the range of the available data even though the MSY range extended well below the data range (Figure 9). The Kuskokwim SEG was based on a conclusion that “the lower bound of the escapement goal should not be lower than the lowest historical estimated escapement that has provided recruit sufficient for meeting subsistence needs.”<sup>4</sup>

<sup>4</sup> Hamazaki, T., M. Evenson, S. J. Fleishman, and K. L. Schaberg. 2012. Spawner-recruit analysis and escapement goal recommendation for Chinook salmon in the Kuskokwim River drainage. ADFG report, Fishery manuscript Series 12-08.

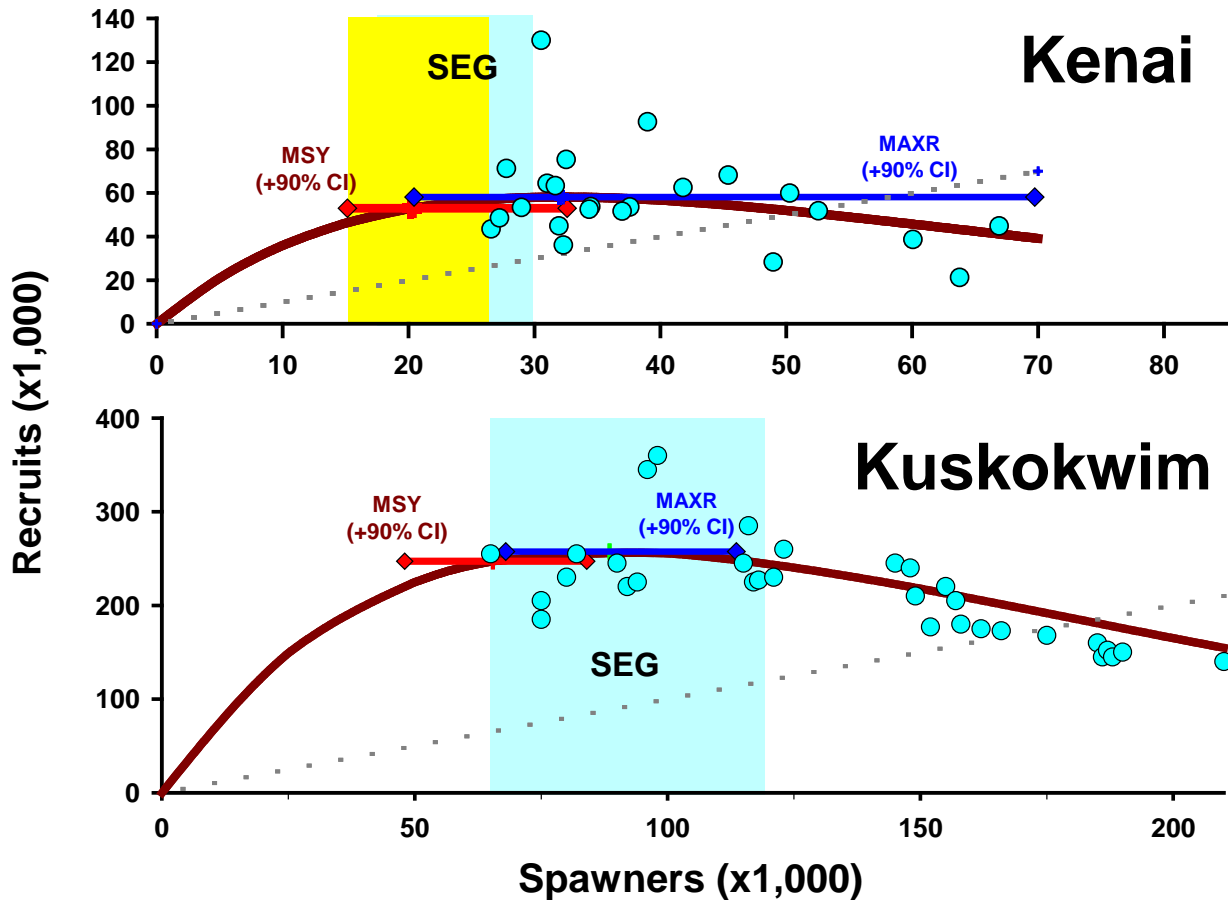


Figure 9. Comparison of Kenai late-run and Kuskokwim escapement goal analyses.

- c) ***Based on the Kenai data, any escapement range between 26,500 and 50,000 could reasonably be defined as an SEG under the definition in the Sustainable Salmon Fishery Policy.***
- i) This range could also be considered "allocation-neutral," in that it includes both MSY and RMAX, and precautionary, in that it avoids low escapements where fish and fishery risks are high.
  - ii) This range would also provide management consistency with past practice and would thus be expected to provide similar harvests and escapements to historical levels over long term variability in marine survival.



### 3) Recommendations are based on inferences and extrapolations from very limited data.

***a) Because historical escapement data were poor, ADFG relied on complex statistical models to infer actual numbers. Escapement goals are based on the “best-fitting” model, but the data are messy and the best fit is not very good. Resulting confidence in estimates of escapement that produce maximum sustained yield or recruitment is low.***

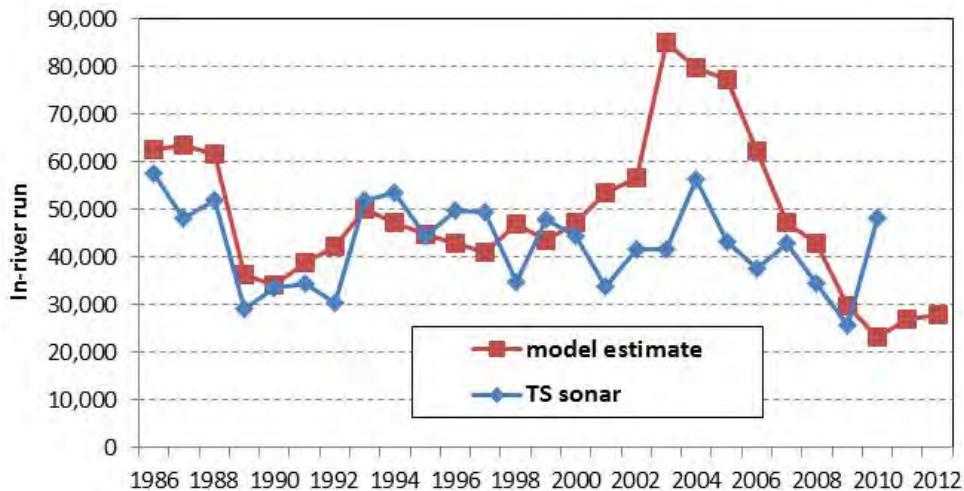
- i) The available data weakly support the stock-recruitment model and related parameter estimates upon which escapement goals are based.
- ii) Spawning escapements of 26,000 to 50,000 are a scatter blast of returns anywhere from about 30,000 to 130,000. No data are available in the ascending limb for escapements below 26,650.
- iii) The model fit is leveraged by a few data points from large escapements of about 60,000 to 70,000 estimated in 2003-2005. Data from large escapements provides some evidence that production declines at large escapements but also drive the shape of the ascending limb where no data exists.
- iv) Low returns from large escapements are purported to represent compensatory reduction in productivity. The model-fitting exercise attempted to incorporate adjustments for variable ocean survival but no independent data were available to distinguish the relative contributions of large escapements and ocean conditions to recent low returns.
- v) Thus, escapement goal recommendations based on the model need to be qualified with a very high degree of uncertainty, even within the range of the observed data points.

***b) Results of the analysis fail to corroborate past assertions that the TS split beam sonar was inflated by sockeye and did not provide an accurate index of in-river run in most years.***

- i) From 1986 through 2010, split beam sonar target strength estimates were used as the primary means of estimating or indexing late-run king abundance. The accuracy of the sonar estimates was validated with mark-recapture data and staunchly defended by the Department for many years.
- ii) Target strength sonar values were largely omitted from the latest analysis. They were reflected in net-apportioned split beam values for 2002-2012 but split beam data from 1986-2001 was entirely ignored.
- iii) ADFG elected to exclude this data from their model because they felt that the TS sonar failed to reflect large run sizes they believed to have occurred from 2003-2005

based on other indicators and high Chinook returns observed throughout Alaska during that period.

- iv) A cursory examination (Figure 10) indicates that TS are correlated with model-derived estimates of “true abundance” and in most years are approximately equivalent in many years except during 2001-2006 when the model estimated very large runs and escapements.



**Figure 10. Relationship between model-derived estimates of “true” abundance and historical target-strength split beam sonar index values.**

- v) Large returns and escapement during 2003-2005 essentially determined the shape of the spawner-recruit curve and subsequent SEG conclusions. Inclusion of TS sonar numbers would very likely have resulted in different estimates of returns during the 2000s than were produced by other indicators with substantial implications for the spawner-recruit fits and resulting escapement goal decisions.
- vi) Inclusion of the full dataset of TS values would also have substantially bolstered the index data during the historical period and also allowed for explicit evaluation of the relationships between TS sonar values and other indices.
- vii) No cogent explanation has been provided for the close correlation of the model and TS sonar numbers throughout most of the historical record and the divergence in just a few years. Lacking a reasonable explanation, the exclusion of this information from the analysis warrants much closer scrutiny.
- viii) Other sonar data was also excluded *a priori* from the analysis. Begich and Pawluk 2010 (ADFG Fishery management Report 10-51) reported a TS sonar in-river run of 48,343 for 2010. ELSD sonar numbers were also presumably calculated for 2010. These numbers were not included in Fleischman and McKinley but would have been



particularly informative since this was the first year of a reported Didson estimates. These data points were excluded from the analysis because of inconsistencies with other data. However, *a priori* exclusion of data can substantially bias estimates of model-derived estimates of true uncertainty and mask other problems that warrant a more rigorous consideration.

**c) *Analyses are subject to a very high degree of uncertainty that is not reflected in the results, due to many underlying, untested assumptions required by the series of complex models employed.***

- i) The Kenai king analysis is much more complicated than is normal practice. It is distinguished by its reliance on inferences from complex modeling rather than simple analysis and interpretation of empirical data.
- ii) Complications were introduced by the lack of a single reasonably-accurate estimate or index of abundance across a range of escapements. We don't have a good time series of direct counts or estimates of the in-river abundance. Nor do we have good indices of king numbers. We do have some imprecise indices for some years based on catch per unit effort and some sonar estimates. We also have point estimates of abundance in a few years based on mark-recapture analyses.
- iii) Typically, when changing assessment methods, the new and old counting methods are run side-by-side to establish a relationship which can then be used to translate historic values and maintain the historical dataset. In the Kenai, this would have meant running the Didson and split beam sonars side-by-side for several years across a range of escapement values. This did not occur.
- iv) Because the index data are so messy and side-by-side data were not developed, ADFG resorted to inferences from a series of models. A complex mark-recapture model was used to estimate "true" abundance. A complex "state-space" model was used to infer missing annual values for "true" abundance from years where both index data and mark-recapture estimates were available. A spawner-recruit model was then fit to the resulting data and used to infer the underlying functional relationship over a broad range of escapements both within and below the existing data.
- v) Each model necessarily relies on a series of simplifying assumptions. Generally speaking, the more complex the model, the more involved the assumptions. Violation of assumptions can substantially bias results. Biases can easily interact and compound across multiple models. It can be practically impossible to satisfy all assumptions of complex models.

- vi) The sensitivity of mark-recapture models to underlying assumptions is very well documented in the technical literature.<sup>5</sup> In particular, an assumption of random population sampling at marking and recapture is critical and very difficult to meet in practice. Violation of this assumption can result in order-of-magnitude biases in corresponding estimates. Methods and results of the mark-recapture analysis are not published and, hence, unavailable for review.
- vii) Fleischman and McKinley specifically identify several key assumptions of their analysis. These included: 1) index variables are linearly related to the underlying true abundance, 2) mark-recapture estimates of in-river abundance are unbiased, and 3) productivity varies in a density-related manner described by the Ricker stock-recruitment relationship. Some model sensitivity analyses were conducted to explore to effects of assumptions on model results but data were lacking to directly test most assumptions.
- viii) The analysis used advanced statistical methods to reflect uncertainty in model estimates related to measurement error of model inputs. However, the model results do not reflect uncertainties related to underlying assumptions of the model construct.
- ix) Further, because the data so limited, collection of additional data will inevitably result in significant changes to the parameter estimates and related interpretations, practically on a year-to-year basis. Whatever we think the numbers are today, we will think they are different tomorrow.

***d) ADFG's recommendation for even lower Didson-equivalent escapement numbers is particularly uncertain.***

- i) The new SEG of 15,000-30,000 kings is equivalent to only 11,700-23,400 kings counted by the Didson sonar. (Didson numbers are 22% lower than "true" abundance.)
- ii) The SEG is based on "true" abundance which includes both "actual" fish counted by the Didson sonar and "virtual" fish that were not directly observed but estimated from differences in other estimates and sonar counts.
- iii) "True" abundance was estimated to be 1.28 times greater than Didson counts because some fish are assumed to pass by the sonar undetected by swimming behind the sonar during high water periods.

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<sup>5</sup> Seber, G. A. F. 1982. *The estimation of animal abundance and related parameters*. Griffin, London.

- iv) The correction factor was estimated from ADFG’s state space model but is effectively based on years of concurrent Didson and mark-recapture or model-derived estimates of abundance (S. Fleischman, personal communication).

**Table 3. Annual abundance measures for estimating the relationship between Didson and actual run size of late-run kings to the Kenai River (from Table 3 in Fleishman and McKinley 2013).**

Year	Didson	Mark-Recap.	MR/Didson	Model est.	Model/Didson
2010	19,000	21,330	1.12	23,250	1.22
2011	21,036	27,300	1.30	27,090	1.29
2012	21,914	25,080	1.14	27,910	1.27
Avg.			1.19		1.26

- v) Year-specific mark-recapture estimates and corresponding Didson correction factors changed substantially from the draft and final version of this report.
- vi) The model-based origin of mark-recapture and “true” abundance numbers results in low confidence in this number as a basis for management.
- vii) The correction factor will inevitably change as additional data is developed. Movement of the Didson to an upstream location is expected also to change the situation entirely within a couple years (albeit subject to a new issue of kings spawning downstream from the sonar).

**4) ADFG’s analysis underestimates risks of management for low escapement goals because it does not account for the imperfect ability of in-season management to determine actual run strength and control harvest accordingly.**

**a) *The ADFG analysis did not evaluate fishery management challenges and risks related to the new goals.***

- i) ADFG’s analysis did not evaluate the effects of new goals on fishery management under current management plans, how new goals would result in changes in historical management strategies, or whether current tools can be effectively employed to manage for the new standards.
- ii) This issue is acknowledged on page 19 of the report: “*Although not addressed in this report, uncertainty associated with projecting Chinook salmon run abundance in real time during the fishing season remains an important challenge to managing these fisheries during periods of low Chinook salmon abundance.*”

**b) *Fishery implementation errors during low run years will inevitably result in lower escapement which will reduce future yields and prolong periods of low abundance.***

- i) Management for low escapements at or in the steep ascending limb of the stock-recruitment curve provides no margin of safety for inaccurate preseason forecasts or in-season projections of run size.
- ii) Problems will be most acute when low returns are not recognized in time to implement meaningful fishery restrictions in years when run timing is early.
- iii) The risk is compounded because a substantial share of the harvest occurs in marine waters before run strength can be effectively assessed based on sonar counts.
- iv) The ADFG model estimated escapements that would produce MSY in a perfectly predictable and controllable world.
- v) In the real world, management for this goal will consistently produce very low returns that will place future yields and possibly stock resilience in jeopardy.
- vi) If low escapements are compounded by poor ocean survival, conservation concerns also become an issue.

**c) *Goals provide little or no margin of safety for fishery management considerations.***

- i) The SEG was adjusted slightly upward by ADFG with the intent of providing a safety factor for uncertain data.
- ii) No adjustments were incorporated by ADFG in the SEG for risks related to fishery implementation.
- iii) Additional precautionary measures might include adopting abundance-based fishery step-down restrictions that ensure a softer landing or defining a higher Optimal Escapement Goal (OEG) threshold that recognizes management uncertainty.

**5) Unless the Board of Fisheries adopts new restrictions on king salmon harvest at low runs, the goals will support a substantial increase in fishing rates on record low runs of Kenai kings during a period of declining abundance, uncertain future productivity, and failure of the historical stock assessment methodology.**

- i) Reductions in goals will reduce the imperative for careful commercial fishery management to protect king escapement and increase the prospects for the sport and personal use fisheries to disproportionately share the conservation burden for Kenai late-run kings in years of low returns.
- ii) Even where sport fishery managers might be inclined to adopt precautionary restrictions at low run sizes, the current management plan does not require commercial restrictions specifically tied to king escapement until the sport fishery is closed.



- iii) Unless the Board of Fisheries adopts other restrictions, the lower goals will greatly reduce the likelihood of fishery restrictions to protect kings, particularly in the east side set net fishery.
- iv) It is also likely that lower king goals will be used as justification for commercial fishery proposals to eliminate other provisions in the sockeye management plan including fishery windows, in-river goal tiers, and optimum escapement goals.
- v) Both lower and upper bounds on escapement goals will have significant implications to future fishery management. No one can reasonably predict whether we will continue to remain in a low productivity period or revert to a more normal pattern. That is one of the reasons why the goal is established as a range and why it is based on historical data rather than some future projection.

## ***KRSA: UCI KING SALMON TASK FORCE NOTES ON KRSA FISH BLOG***

### **Upper Cook Inlet King Salmon Task Force Wraps Up without Consensus – Part One**

February 26th, 2013

The Upper Cook Inlet (UCI) king salmon task force held its final meeting February 14 and closed up shop without much fanfare or consensus on a final recommendation, but not without undertaking some of the most comprehensive discussions yet on the subject of conservation of late-run Kenai River king salmon. The task force adopted a “compromise” work product from Dwight Kramer as a template for discussion, and then after lengthy conversation voted 5 – 4 on just about everything of substance with votes split along partisan interests between sport and commercial users.

The final work product of the task force now moves on to the Alaska Board of Fisheries (BOF) as proposal 249 for consideration during its Statewide Finfish meeting March 19 – 24 in Anchorage. Public testimony will be taken at the meeting, with a written public comment deadline of Tuesday, March 5.

The task force was created by the BOF after the 2012 season in response to historic fishery closures justified by the smallest number of late-run Kenai River king salmon ever observed. The mission of the task force was essentially to identify the best mix of fishing opportunity during times of low king salmon abundance and the best means of attaining the escapement goal. The great challenge was defining best mix, best means and selecting the most appropriate escapement objective. Discussion undertaken by the task force initially bounced off just about every old gripe and whine that has become part and parcel to the Cook Inlet fishery saga. But in the end there were two basic issues:

1. the escapement objective, and
2. the question of how the burden of conservation should be shared between the sport and commercial set net fisheries.

Unfortunately, the final work product of the task force does not fully address the initial goals as set forth by the mission statement. In parts two and three, we examine how well the “final” recommendation of the task force achieves its stated mission of attaining the escapement goal of late-run Kenai River king salmon while providing the best mix of fishing opportunity to user groups.

## UCI King Salmon Task Force: The Escapement Goal – Part Two

February 26th, 2013

The Alaska Department of Fish and Game (ADFG) used the task force process to present the results of the Department's *Run Reconstruction and Interim Escapement Goal Recommendation for Kenai River Late-Run Chinook Salmon*. After nearly a decade of stock assessment challenges, ADFG has recommended a new escapement goal that is significantly lower than the old goal and brings with it a list of uncertainties. The old goal based on split beam sonar was a Sustainable Escapement Goal (SEG) of 17,800 – 35,700. The new goal is a SEG of 15,000 – 30,000 and is measured by counting king salmon with the newer and more accurate Didson sonar and expanding the Didson count by a factor of 1.28 to account for fish not counted by the sonar beam in past years.

As noted by department staff during their presentation of the new king escapement goal, there are at least three aspects of their analysis and recommendation that argue for cautious application of this new goal. First there is no brood year return data to support a SEG of less than 26,000; second, an acknowledgement that we are experiencing low production of king salmon, most likely a result of ocean conditions; and third, the expansion factor of the Didson count adds risk to fish stocks.

In KRSA's proposed Kenai River Late-Run King Salmon Step-Down Management Matrix, our position was to accept ADFG's recommended SEG as the primary management "target," but acknowledge the uncertainty around this interim goal by applying the precautionary principle described in the Policy for Management of Sustainable Salmon Fisheries (PMSSF – 5 AAC 39.222). The precautionary principle would be embodied by creating a management strategy that assures achievement of escapements within the confines of the SEG. This management strategy would require department managers to begin to "tap on the brakes" as the projected escapement of late-run Kenai River king salmon fell into the lower bound of the SEG. In this escapement range, which we labeled as the precautionary zone, regulations would become increasingly restrictive if the projection continued to decline. We came to this proposed course of action after a thorough evaluation of the recommended SEG of 15,000 – 30,000 (the target for management) and discussions with department managers about their ability to hit the target (management precision). Managers stated that their precision was on the order of one-half the size of the target or roughly plus or minus about 7,000 fish. In our proposal the precautionary zone extends from 15,000 to 22,000 kings.

In this part of the SEG range, managers would begin to tap on the brakes when escapements were projected to fall below a "trigger" of 22,000 and there would be no specific date on which this call would be required. In-season assessment varies from year to year and it is our desire

that managers make important calls like this when the data tells them the time is ripe rather than on a fixed date that may or may not work from year to year. It is our desire that escapements of greater than 15,000 be realized on each and every year. If escapements of at least 15,000 cannot be achieved all fisheries would close.

In contrast to KRSA's position to accept the ADFG proposed interim SEG from 15,000 to 30,000 and to manage in a precautionary manner the closer one got to the lower bound of the goal, set netters on the task force proposed something quite different. Their initial proposal was to stake out a claim that it was perfectly acceptable to fish below the minimum escapement goal of 15,000, all the way down to 11,000 kings. They proposed creating an Optimal Escapement Goal (OEG) of 11,000 to 30,000 and use the lower bound of the interim SEG, 15,000, as a trigger for managers to begin slowing down the fisheries.

One of the "compromises" brought forth in the Kramer proposal was to raise the lower end of the proposed OEG to 13,000, which is still below the lower bound of the proposed interim SEG. There is very weak scientific justification for any lowering of the lower bound of ADFG's proposed escapement goal recommendation. With only model derived theoretical "yields" below 23,000, we don't know what a return of 15,000 will produce let alone 11,000. It is a major red flag to KRSA and most others in this discussion that the productivity of king returns in recent years have been a lot closer to one to one than the run reconstruction model prediction of three to one, and that the model is based on inferences and extrapolations from a very limited data set.

Betting on very high future production from very low escapements is very risky in our opinion, but that viewpoint was not shared by set netters or their supporters. From their perspective, it would be normal to fish below the lower bound of 15,000 and only begin to take conservation measures below that point. But as task force co-chair Webster pointed out during the meeting, the BOF has never approved an OEG for king salmon that has a lower escapement threshold than its existing SEG or BEG.

Another difference between proposals was that in the commercial fisheries oriented proposal, a trigger date of July 21 was put forth from when any fishery management decisions could start to restrict fisheries. But ADFG managers were clear during the meeting that they did not want a fixed date in the management plan, as it was not clear what should occur if the projection is available at an earlier date. In contrast, the KRSA management matrix left it up to the ADFG managers to decide if and when any restrictive management actions are warranted.

Hence with regard to the escapement objective, two very different approaches were put forth during the task force meetings and there was no consensus by sport and commercial partisan



factions to support either approach. Adoption of the set net approach would have us fish below the recommended SEG of 15,000 – 30,000 and only start to take conservation measures after July 21 if the final escapement projection was less than 15,000, and only stop fishing if it then fell below some point between 11,000 to 13,000 fish.

**We cannot agree to the course of action proposed by set netters and their supporters.** Our position is based on the belief that exploiting Kenai kings at a consistently high level during a period of low returns is a significant risk that could very well depress future production, prolong the period of poor runs, and reduce future yields. Couple this with a confluence of chance events, such as higher than average exploitation rates due to big sockeye runs and poor ocean survival conditions for the next king generation, we could very well find ourselves at a point where the stock is not healthy. By definition, allowing user groups to continue fishing until we are close to 30% below the new lower bound of the escapement goal of 15,000 does not meet a critical part of the task force mission. In part three, we will examine the concept of sharing the burden of conservation during times of low king salmon abundance.

### **UCI King Salmon Task Force – Sharing the Burden of Conservation – Part Three**

February 26th, 2013

As put forth in KRSA's proposed Late-Run Kenai River King Salmon step-down management matrix, it is our position that the burden of conservation must be shared between the sport and commercial set net fisheries when in-season restrictions are required to achieve the escapement objective. Further, this regulatory burden of conservation between the sport and commercial set net fisheries should be shared in a prescriptive and paired step-down manner consistent with language in the Policy for Management of Sustainable Salmon Fisheries (PMSSF – 5 AAC 39.222).

Specifically when ADFG assesses that restrictions are required and bait is prohibited in the in-river sport fishery then the commercial set net fishery is restricted to no more than 24 hours of fishing time per week. The personal use and marine sport fisheries would also face restriction. If a further step-down of the fisheries is required to achieve the escapement objective then the in-river sport fishery is restricted to catch and release, and the commercial set net fishery is restricted to one eight hour opening per week. If escapements are projected to fall below the SEG then the fisheries should close. Restrictions in place for the set net fishery on July 31 when the sport fishery closes would remain in place unless the department projects that the escapement of late-run kings would fall outside the precautionary zone bounds of 15,000 to 22,000.

In contrast and as noted in part two, the proposal from commercial fishing interests also calls for a sharing of the burden of conservation when in-season adjustments are required, but their first step is to place the burden of conservation on the fish, not the users. By creating an OEG and lowering the escapement goal by 2,000 – 4,000 fish, *king salmon* bear the brunt of any conservation measures in their plan. What is of interest, though, is that any additional step-down measures for conservation in their plan when the minimum escapement goal of 15,000 could not be met are very similar, but not the same as those we recommend.

In their proposal, specifically the restriction of bait in the sport fishery would be paired with a restriction of up to half of the authorized hours of fishing time per week in the commercial set net fishery. This would be 36 hours in the middle tier of abundance for late-run sockeye. A further restriction to catch and release would be paired with a 12 hour per week restriction in the set net fishery. This is the first time that members of the set net community have publically support the concept of any type of paired step-down measures prior to closure of both sport and set net fisheries. At this time, set net users prefer to use time restrictions as the best means to control their harvest of king salmon. The big caveat with their concept of paired restrictions is that they only take place below the minimum escapement goal and come off whenever an escapement of at least 15,000 kings is projected. We believe that this will not result in a distribution of escapements within the SEG as proscribed by the PMSSF.

The PMSSF gives policy direction for situations as we currently face and is a valuable touchstone for figuring out how to define what success looks like in terms of identifying the best mix of fishing opportunity during times of low king salmon abundance and the best means of attaining the escapement goal:

- Base decisions to ensure conservation of salmon and the sustained economic health of Alaska’s fishing communities;
- Wild salmon stocks should be maintained at levels of resource productivity that assure sustained yields;
- In the face of uncertainty, salmon stocks and fisheries SHALL be managed conservatively;
- A PRECAUTIONARY approach that takes into account the uncertainties in salmon fisheries should be applied to regulations and control of harvest;
- Where the impact of resource use is uncertain, but likely presents a measureable risk to sustained yield, priority should be given to conserving the productive capacity of the resource.
- The burden of conservation will be applied to users in close proportion to the users’ respective harvest of the salmon stock.

We believe that our proposed management matrix best achieves the objectives set forth for the task force. We put the fish first by following the precautionary principle of the PMSSF. We provide for prescriptive and paired step-down measures that avoid the disastrous sport and

commercial closures witnessed in 2012. We maintain historical harvest rates and retain management directives for kings and sockeyes. And finally through the step-down measures the burden of conservation is shared between user groups at low king salmon abundances. The outcome of such measures will look to achieve escapements above the minimum escapement goal even at low abundances, while providing for no less than two 12 hour periods per week for set net fishery and retention but no bait for sport fishery, with implementable and transparent trigger points for management.

As we discussed in a prior blog the focus of the UCI king salmon task force is king salmon, not sockeye. In 2012, the harvest of sockeye salmon by all user groups in UCI was equal to the preseason forecast of 4.4 million. ADFG has many tools to deal with management of sockeye – what is needed now are new tools to deal with management of king salmon at low abundances.

Unless the BOF adopts new restrictions on king salmon harvest at low runs, the new lowered escapement goal will support a substantial increase in fishing rates on record low runs of Kenai kings during a period of declining abundance, uncertain future productivity, and failure of the historic stock assessment methodology. An average exploitation rate consistent with the proposed new escapement goal substantially exceeds the maximum rate estimated at any point in the last three decades. Without prescriptive and paired restrictions in the sport and commercial set net fisheries as the lower bound of the goal is approached, there will be a substantial and unacceptable increased risk to fish.

The task force process while frustrating at times was constructive in narrowing down and clarifying the options that the BOF will have before them in March when they deliberate and adopt an interim plan for 2013. We want to thank BOF members Vince Webster and Tom Kluberton for co-chairing the task force process and thank the members of the task force who volunteered their time.

### **Cook Inlet task force focus was meant to be on king salmon conservation concerns, not sockeye**

February 19th, 2013

Frequent complaints put forth by commercial fishing advocates during the winter meetings of the Cook Inlet king salmon task force had nothing to do with king salmon, but instead were focused on sockeye salmon. The sockeye complaints can be boiled down to two components:

1. The current Upper Cook Inlet salmon management plans, specifically the windows provisions in the Kenai River sockeye plan, do not allow east side set netters to fish when sockeye are abundant on the beaches, and this happened in 2012 with foregone sockeye harvest

opportunity; and,

2. Foregone harvests of sockeye by east side set netters (ESSN) in 2012 led to another season of “over escapement” of Kenai River sockeye, which should be of greater conservation concern to all interested parties than that of not meeting the minimum escapement goal for Kenai River kings.

Let’s examine closely the merits of this line of reasoning by Cook Inlet commercial fishing advocates. In 2012, both king and sockeye returns to the Kenai River were late, as were salmon runs across the state, most likely to due to the unusual record setting snowfall during the prior winter. In 2012, the opening date for Kenai section of the ESSN was Monday, July 9, but that regular period was closed by the Alaska Department of Fish and Game (ADFG) due to conservation concerns with low king salmon abundance. The second regular opener of that week, Thursday, July 12, was also closed, but this closure was also due to *low sockeye salmon abundance*, as clearly noted in the ADFG announcement for Emergency Order Number 10:

*The current cumulative passage estimate of sockeye salmon in the Kenai River through July 10, 2012 is 56,000 fish. The average cumulative passage through July 10 in the Kenai River in the previous 10 years is 93,000 fish. In the Kasilof River, the cumulative passage through July 10, 2012 is 87,000 fish. The average cumulative passage in the Kasilof River from the previous 10 years is 125,000 fish.*

Thus ADFG had *sockeye* conservation concerns for both the Kenai and Kasilof Rivers in addition to those for king salmon. As of Friday, July 13, less than 100,000 sockeye salmon had entered both the Kenai and Kasilof Rivers. Over that weekend (July 14 – 15), a large pulse of sockeye moved its way up the east side beaches and entered both river systems, with 315,000 entering the Kenai and about 55,000 coming into the Kasilof.

During the king salmon task force meetings, a frequent commercial fishing “talking point” focused on the “missed” harvest opportunity by east side set netters on this large pulse of sockeye, due to the hands of local area fishery manager supposedly being tied unnecessarily by the current management plans (i.e. windows). However, the windows provision in the sockeye plan had nothing to do with the decision by the local ADFG commercial fishery manager to not fish on this large pulse of sockeye as it moved up the east side beaches. During the task force meetings, more than once the local ADFG commercial fishery manager stated that he intentionally chose not to fish on that pulse of sockeye because so few had entered the river systems up to that point in the season, and he needed to bank this pulse of sockeye to ensure that the minimum escapement numbers for both the Kenai and Kasilof sockeye would be met.

Thus the east side set net fishery missed fishing opportunity early in the season not only because of king salmon conservation concerns, but also for sockeye salmon conservation concerns. The frequent commercial broadsides against windows as the reason that ADFG decide to not fish on that pulse of fish are seriously flawed, but what is of equal or greater concern is that they continued to be hurled even after the local ADFG commercial fishery manager explained in detail several times the reasons for such management action.

The second frequent yet erroneous complaint heard from commercial fishing advocates was that in 2012 the Kenai River had another over escapement of sockeye salmon, and that going over the upper end of the sockeye escapement goal should be an equal if not greater conservation concern for all who care about Cook Inlet salmon fisheries. Here is another instance when such claims by commercial interests turn up to be unfounded as it relates to the 2012 Kenai River sockeye escapement and just plain dangerous when applied to king salmon, which is a topic for a future blog.

In 2012, ADFG forecast the Kenai River sockeye run to be about 4,026,000, and the final return came in about ten percent higher at 4,472,000. The Optimal Escapement Goal (OEG) is 700,000 to 1,400,000. The final sonar count for Kenai River sockeye was 1,581,555, from which the in-river sport harvest (determined from the Statewide Harvest Survey) above the sonar is subtracted to get the final escapement. Assuming that the sport harvest above the sonar is at least the 300,000 seen in 2011 (both years had similar angler effort for the sockeye sport fishery above the sonar) the final escapement for Kenai River sockeye in 2012 will be most likely less than 1,281,555, just above the Sustainable Escapement Goal (SEG) range of 700,000 to 1,200,000. This means that in 2012, Kenai River sockeye escapement met the OEG, and will be at or just above the SEG. The Kasilof River fell within its OEG range of 160,000 to 390,000, coming in at 375,000. And this in spite of very limited time provided to the east side set net fishery, and no set net fishing on the largest pulse of sockeye to enter the Kenai and Kasilof Rivers in 2012 as noted above.

In 2012, harvests by the Upper Cook Inlet commercial fishery, almost exclusively by the central district drift fleet, generated the third highest ex-vessel value in the past ten years, supplied most seafood processors with an expected number of sockeye based on the size of the return, and provided sockeye escapements into the Kenai and Kasilof rivers within their respective escapement goal ranges. It is extremely unfortunate that both the in-river sport and east side set net fisheries had to endure restriction and closure due to king salmon conservation concerns. Trying to divert attention away from legitimate king salmon conservation concerns with false and misleading narratives about sockeye issues do not in any manner help the dialogue about how to prevent similar losses of fishing opportunity in subsequent years.

## **Primarily and Minimize – Where do these important directives come from in the Upper Cook Inlet salmon management plans? Part One.**

February 12th, 2013

A quick read through the management plans that govern the salmon fisheries of Upper Cook Inlet (UCI) will highlight the use of the terms *primarily* and *minimize*. But where did these important directives come from, what do these terms really mean and how are they implemented? In part one, we will examine the historical context of the terms *primarily* and *minimize*.

Prior to the mid-1970s the UCI commercial salmon fishery spanned the months of May through September. Many of the stocks that supported fishing in May, June and September were at historical low abundance by the early 1970s. Sport fisheries were small but depended on some of those early and late stocks particularly early Russian River sockeye, all early run king salmon and late-run Kenai River coho salmon. In 1976 an agreement, now referred to as the Upper Cook Inlet Salmon Management Policy, was reached that basically stated the following: salmon moving through the marine waters of Upper Cook Inlet prior to July 1 are to be managed primarily for sport, salmon moving through the marine waters of UCI from July 1 through August 15 are to be managed primarily for commercial uses, however the commercial fishery should be managed in a manner that minimizes the incidental take of Susitna coho, late Kenai king salmon and early Kenai coho salmon stocks. After August 15 salmon stocks moving to spawning areas in the Kenai Peninsula drainages will be managed primarily for recreational uses and salmon other than those spawning in Kenai Peninsula drainages will be managed primarily for commercial uses.

As the mixed stock, mixed species sport and commercial fisheries became more intense and economic values for the sport fishery soared, the Alaska Board of Fisheries (BOF) developed codified step-down plans for each of the major salmon species identified in the UCI Policy. As these step-down plans were adopted the primarily language was shifted from the UCI Plan to each of the codified step-down management plans. Now the UCI step-down plans that govern important fisheries each contain in its opening section a purpose statement. These purpose statements are just that, a purpose statement. The statements are important in that they lay out the overall approach desired by BOF.

The purpose statement included in 5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan states, “the purposes of this management plan are to ensure an adequate escapement of late-run king salmon into the Kenai River system and to provide management guidelines to the department. The department shall manage the late-run Kenai River king

salmon stocks primarily for sport and guided sport uses in order to provide the sport and guided sport fishermen with a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of in-river restrictions.”

The purpose statement for 5 AAC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan states, “the department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial uses based on abundance. The department shall also manage the commercial fisheries to minimize the harvest of Northern District coho, late-run Kenai River king and Kenai River coho salmon stocks to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.”

The BOF recently formed a Task Force to examine strategies for managing the UCI salmon fisheries during these times of low abundance of king salmon, particularly late-run Kenai River king salmon. Since the purpose statements are sections of the codified regulations they should provide fairly specific direction to the Task Force. If that is to happen it is important to first understand just what each of these directives has come to mean in terms of prescriptive regulations and historical distribution of the harvestable surplus.

### **Primarily and Minimize – Their meaning and implementation in Upper Cook Inlet salmon management. Part Two.**

February 12th, 2013

In part one of our discussion on the policy directives of *primarily* and *minimize*, we looked at where these important terms came from and in part two we examine what do these terms really mean and how are they implemented.

First let’s look at the term *primarily*. The late-run king plan states that achieving the desired escapement objective and managing Kenai River Late-Run King Salmon *primarily* for sport and guided sport fishermen in order to provide the sport and guided sport fishermen with a REASONABLE OPPORTUNITY TO HARVEST THESE SALMON RESOURCES OVER THE ENTIRE RUN, AS MEASURED BY THE FREQUENCY OF IN-RIVER RESTRICTIONS. It is pretty clear that when the BOF included this language in the plan the board’s intent was to ensure that there was enough harvestable late-run king salmon in the river to support a fairly normal sport fishery, which in July means the use of bait and retention.

Another way to measure *primarily* is to assess the proportional distribution of the total harvest of late-run king salmon. For years the Alaska Department of Fish and Game (ADFG) considered all late-run king salmon taken in the east side set net (ESSN) fishery to be of Kenai River origin for the purpose of run reconstruction even though it was widely accepted that some of the



commercial harvest was bound for the Kasilof River. During the years 1980 – 2011 the ESSN fishery was the beneficiary of up to 50 percent of the total harvest with the Kenai River sport fishery taking most of the remaining harvest. A few fish were taken each year in the marine waters of Cook Inlet by sport anglers, a small number were taken annually by the commercial drift fishery and usually not more than a thousand were taken in the Kenai River personal use fishery.

The results of recent genetic studies have provided more insight into the river of origin of late-run king salmon taken in the ESSN fishery. Now fishery managers believe that 20 – 25 percent of the late-run king salmon taken in the ESSN fishery are of Kasilof River origin, making that fishery the primary harvester of late-run Kasilof River king salmon, for which there is still no management plan or annual enumeration. Pulling those fish out of the comparison leaves the ESSN fishery / Kenai River sport fishery split of approximately 40 percent / 60 percent annually. So if managing primarily for sport and guided sport is expressed in terms of the historical harvest proportions, then assessment tells us that *primarily* is situationally defined by a long history of about 60 percent of the total harvest going to the sport fishery.

Compare this with what was observed in 2012 and how it is likely to play out in 2013 if no changes are made to the management plans. In 2012 both the ESSN and in-river sport fisheries were restricted from the start of the season and closed throughout most of July. When this disastrous season was over the sport fishery had taken about 300 late-run kings and the ESSN fishery had a harvest estimate of just over 700. If few restrictions and about 60% of the total harvest are the criteria against which *primarily* is measured then it is clear that we failed to achieve our objective for the in-river sport fishery.

What we did learn from 2012 was at the present low levels of abundance of late-run king salmon normal prosecution of the ESSN fishery can result in harvest of late-run kings large enough to force managers into placing significant restrictions on the sport and guided sport fishery. That outcome is absolutely inconsistent with the purpose of the Kenai king salmon management plan. If there is a limited number of surplus late-run king salmon the sport and guided sport fishery must be assured the opportunity to harvest at least half of that surplus. Restricting the sport and guided sport fishery to catch and release only while allowing the ESSN fishery to harvest hundreds or thousands of late-run king salmon is unacceptable.

The term *minimize* first entered the lexicon of UCI codified regulation in the 1970's with the adoption of the Upper Cook Inlet Salmon Management Policy. In the policy, ADFG was instructed to conduct commercial fisheries in an effort to minimize the harvest of late-run Kenai River king and coho salmon and Susitna coho salmon. *Minimize* is now a prominent directive in both the Late-Run Kenai River Sockeye and Drift Gill Net Fishery management plans.



Over the years the definition of “minimize the harvest of late-run Kenai River king salmon” has come down to two prescriptive management directives. The most important regulation currently on the books providing a definition of *minimize* is WINDOWS. Windows, the weekly mandatory closures of the ESSN fishery on Tuesdays and Fridays, are the most important component of the regulatory definition of *minimize*. Simply put MINIMIZE=WINDOWS. The mandatory weekly closures for the ESSN allow pulses of salmon to enter the river to provide for adequate escapement across all components of the run and to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.

The second component is the hourly restrictions for use of Emergency Order (EO) openings in accordance with abundance of sockeye salmon of Kenai River origin. In addition to the two 12-hour regular openers on Mondays and Thursdays, the ESSN is afforded EO hours based on abundance of sockeye, which is divided into three tiers: below 2.3 million (low), between 2.3 – 4.6 million (normal), and above 4.6 million (high). The EO hours per week are as follows:

During normal abundance of sockeye (between 2.3 – 4.6 million), there is 51 EO hours available per week, which on average allows for five days of ESSN fishing at 15 hours per day. For high abundance of sockeye (above 4.6 million), there is 84 EO hours available per week, which on average allows for six days of ESSN fishing at 18 hours per day as the Tuesday window is removed. At low abundance of sockeye (below 2.3 million), there is 24 EO hours available per week, which on average allows for four days of ESSN fishing at 12 hours per day.

With the combination of 24 hours per week for regular openings and the additional EO time based on the abundance tier, the time available to fish the ESSN fishery ranges from 48 hours to 108 hours per week. Windows and available EO time in the ESSN fishery work in tandem to allow for the harvest of sockeye salmon primarily for commercial purposes while providing for adequate in-river escapement and harvest of salmon resources.

As the UCI Task Force pursues its mission, the members must not abandon the overall objectives developed over 35 years of regulatory development.

### **ADFG proposes new escapement goal for late-run Kenai River king salmon**

January 19th, 2013

The Upper Cook Inlet King Salmon task force met on Monday, January 14 in Kenai to review the Alaska Department of Fish and Game (ADFG) new draft interim escapement goal for late-run Kenai River king salmon and to further discuss options for king salmon management during

times of low abundance. The task force will make recommendations to the Alaska Board of Fisheries (BOF), which will be discussed at the BOF statewide finfish March meeting in Anchorage. Any action taken by the BOF at its March meeting for management in 2013 will be sunset, so that a more comprehensive approach can be taken at the BOF next regular meeting for Upper Cook Inlet (UCI), scheduled in Anchorage for January 29 through February 11, 2014. The deadline to submit proposals for the 2014 UCI BOF meeting is April 10, 2013.

At the recent task force meeting, ADFG outlined its new draft interim escapement goal for late-run Kenai River king salmon. It is a draft at this time until ADFG receives all comments in its peer-review process, expected to be finalized in February. The new proposal is a sustainable escapement goal (SEG) from 15,000 to 30,000, as a measure of “true abundance.” It is considered interim in nature until a final goal can be established after the Didson sonar is moved upstream above the tidal area. Starting in 2013, ADFG will run a second Didson sonar unit at RM 13. The new interim goal is a reduction of fifteen percent for the lower and upper ends of the range, from the current SEG goal of 17,800 to 35,700. ADFG will calibrate “true abundance” by using Didson sonar and then multiplying counts by a correction factor of 1.31 to account for speculated undercounts of kings in the tidal area at RM 8, making the new range from 11,450 to 22,900 in Didson units.

KRSA will provide ADFG with our analysis of the new proposed SEG for Kenai River king salmon. We have conservation concerns that the new goal will have very significant fishery management implications. Unless the BOF adopts new restrictions on king salmon harvest at low runs, ADFG’s proposed goal will support a substantial increase in fishing rates on record low runs of Kenai kings during a period of declining abundance, uncertain future productivity, and failure of the historical stock assessment methodology. A primary concern for KRSA is that the proposed low end of ADFG’s recommended goal is well below the range of current data. The proposed low end at 15,000 is substantially less than any escapement ever recorded where production has been estimated. The lowest escapement of late-run Kenai River king salmon from which the return is complete was 26,550 in 1989, which is about 6,000 more than the newly proposed estimate of maximum sustained yield (MSY) of 20,260, and nearly 12,000 above the minimum goal of 15,000.

KRSA is especially concerned about the impacts that the lowered Kenai king escapement goal will have on exploitation rates. According to the revised run reconstruction by ADFG, historical exploitation rates in combined commercial, personal use and sport fisheries averaged 39 percent per year from 1986 – 2012. The maximum historical rate was 53 percent, and in only three of the past 27 years did the rate reach or exceed 50 percent. However, with the proposed lowered SEG goal, the exploitation rate at MSY (20,260) in ADFG’s new stock recruitment model is 63 percent. Thus the average exploitation rate consistent with the proposed new escapement goal substantially exceeds the maximum rate estimated at any point in the last three decades.

Even higher exploitation rates (68 percent) are consistent with the lower end of the proposed escapement goal range (15,000).

In light of the increased risk to future returns of late-run Kenai River king salmon, KRSA through task force member Kevin Delaney has put forth a draft matrix for a 2013 interim management plan concept. The objectives of which are to achieve a spawning escapement consistent with ADFG recommendation, SEG range of 15,000 - 30,000; provide ADFG management with statistically significant and implementable trigger points; retain management directives primarily for sport, minimize commercial harvest of late-run kings and maintain approximate historical distribution of harvest between in-river sport and set net fisheries; and share burden of conservation equitably across abundance strata with paired restrictions.

KRSA will continue to keep its members informed of progress on this important matter regarding the long-term health and sustainability of the iconic Kenai River king salmon and will release our assessment of ADFG's proposed interim escapement goal in the near future.

### **Regular Periods and Windows – Business or Biology?**

December 11th, 2012

In the first meeting of the Kenai River King Salmon task force a discussion of the utility of mandatory regular periods and windows for the east side set net (ESSN) fishery took place. For about as long as folks can remember the ESSN fishery in Upper Cook Inlet (UCI) has fished what are called "regular periods." There are two regular periods per week, each of which is 12 hours in length, extending from 7am to 7pm. Monday and Friday were originally designated regular periods but in the late 1990's the Alaska Board of Fisheries (BOF) changed the Friday regular period to Thursday in an effort to put more fish in the Kenai River for the large numbers of people who participate in the sport and personal use fisheries on the weekends.

Since fish don't look at a weekly calendar or a clock then head for shore on Mondays and Thursdays, what is the utility of regular periods? In the years just after Alaska was granted statehood most salmon populations, including those of UCI origin, were in bad shape and harvests were significantly lower than what we have today. Commercial fishing interests asked the then Alaska Board of Fish and Game to establish regular periods in an effort to have some level of predictable fishing opportunity and organize their efforts around some level of time certain. This helped with hiring and training crew members and in planning for the operation of the seafood processing industry.

The selection of Mondays and Fridays split the week so that management could assess harvests and the health of the runs and, if run strength warranted, the hope was that the Alaska Department of Fish and Game (ADFG) would allow fishing on Wednesdays. The total time

typically fished per week for the ESSN fishery was either 24 or 36 hours, depending on whether or not the extra period was used.

Regular periods thus were originally established to serve the business purposes of the commercial fishing industry, both for harvesters and processors. A time certain schedule was set, crews could be trained early in the season when fish were not abundant, processors could prepare for delivery of fish and harvesters could hold down other part-time jobs in the community. Over the years the fact that these fishing periods were regular enabled ADFG to utilize the harvest data to assess aspects of the returns of salmon, particularly sockeye and late-run king salmon.

While ESSN harvest data is more integrated into management of sockeye, ADFG does not depend heavily upon this harvest data for management of late-run Kenai River king salmon. The millions of dollars invested annually in the in-river sonar equipment serve that purpose, regardless how imprecisely, as evidenced by the multitude of emergency orders over the years justified by sonar count data alone. Never has an emergency order issued for the conservation of late-run Kenai River king salmon been justified solely upon ESSN harvest data.

Regular periods for the ESSN fishery make little sense in the new reality when reducing harvest of late-run king salmon is the primary concern of fishery managers. Straining the water early and late in the season killing 300-500 late-run king salmon per day when sockeye salmon are not abundant, just because it is Monday or Thursday, ties the hands of management and makes it less likely that intensive ESSN fishing can occur when the sockeye are abundant. During times of low king salmon abundance, fishing based on abundance of sockeye does not mean fish every Monday and Thursday AND when large waves of fish hit the beach.

## **WINDOWS**

Windows are periods of mandatory closure of the commercial ESSN fishery. Windows became a regulatory management tool in the late 1990's after a series of years during which UCI sockeye returns were historically strong; in an attempt to maximize commercial harvest, ADFG issued emergency orders that allowed the ESSN fishery to fish almost continuously for up to three weeks in the second half of July and early August. This practice became known as "back to back periods." These back to backs had a significant detrimental effect on the sport, guided sport and personal use fisheries in the lower Kenai River, the largest such fisheries in the state of Alaska.

Proposals submitted by KRSA asked the BOF to break up these "back to backs" by creating periods of time, spaced out during the week, where the ESSN fishery was closed so that salmon,

both late-run king and sockeye that were close to the mouth of the Kenai, committed to enter the river, could do just that. The BOF has since adopted regulations creating two weekly window closures of the ESSN fishery, one on Tuesday and the other on Friday. These windows provide for continuous escapement during the full course of the return, a management practice called for in the Policy for Management of Sustainable Fisheries, and put fish in the lower river for sport, guided sport and personal use fisheries. This later objective is called for in the preamble of both the late-run king salmon and late-run sockeye salmon management plans.

There is no question that window closures, like regular periods, have somewhat “tied the hands of management” but windows have greater utility. Windows make it possible for large numbers of salmon to enter the river that would otherwise have been caught. This is particularly true during mid-July during the peak of the returns. These salmon serve the biological purpose of providing escapement throughout the course of the run. These fish also serve the business objective of providing opportunity for sport and guided sport anglers to participate in large numbers and supporting the economy of the region. These fish have also served the very important purpose of putting fish on the table for Alaskans who fill their freezers with fish harvested in the personal use fishery. The Friday window is especially important to the personal use fishery because it allows sockeye to enter the lower river in time for working Alaskans to participate in the personal use fishery on the weekends. Sockeye salmon harvested in the Kenai River sport and personal use fisheries now provide Alaska residents with the largest single consumptive use of a fish and game resource in the state, estimated at more than four million pounds per year.

## **BOTTOM LINE**

Both regular periods and windows “tie the hands of management” but in times when low abundance of king salmon is going to drive management of the UCI salmon fisheries it makes much more sense to build commercial fishing opportunity around window closures than to strain the water killing kings on Mondays and Thursdays while waiting for sockeye to hit the beach. Without regular periods there are still five days each week during which ADFG can authorize commercial ESSN fishing in an effort to fish when the sockeye are on the beach. Windows do not stop them from harvesting sockeye any more than regular periods enable them to avoiding kings.

### **Low King Salmon Abundance – an Anomaly or the New Reality?**

December 5th, 2012

At the recent king salmon symposium, the Alaska Department of Fish and Game (ADFG) detailed declining abundance of king returns across Alaska and highlighted the need for basic

information to better understand the underlying reasons for this statewide concern. The Governor subsequently announced a five year, \$30 million commitment by the state to fund additional king salmon research.

2012 king fisheries across the state were officially disastrous. Federal disaster declarations were issued for the Yukon, Kuskokwim and Cook Inlet. In Cook Inlet alone, economic losses were more than \$30 million. Closures cost the king salmon sport fishery an estimated \$17 million. King protection measures resulted in a reallocation of \$16 million in ex-vessel value of the commercial sockeye harvest from the east side set net (ESSN) fishery to the drift fleet fishery.

In anticipation of another poor king return in 2013, the Alaska Board of Fisheries (BOF) has formed a task force to recommend changes to the late-run Kenai River king salmon management plan needed to manage these unprecedented low king returns.

It is against this backdrop that we outlined in prior posts how commercial interests and advocates for the ESSN fishery think that 2012 was an anomaly and that a return to “normal” fishing is on tap for 2013. KRSA believes that such assertions are wishful thinking. We are confronted by a NEW REALITY and it looks like this.

All Upper Cook Inlet (UCI) populations of king salmon are at low levels that have not been seen since the 1960’s. In 2011, based on poor returns since the mid-2000s, four king salmon stocks in the Northern District of UCI were declared Stocks of Concern by the BOF, which then took regulatory action to close sport and commercial harvests on these stocks. Anticipation of low king returns in 2012 led to pre-season restrictions of all fisheries in Cook Inlet that harvest king salmon. Fisheries were then closed in-season as runs failed to materialize at levels needed to assure both harvest and minimum spawning escapements.

UCI king salmon management plans and fishing regulations were designed in the 1980s and 1990s around population levels that were 2-3 times larger than what we observed in 2012. The current plan was not designed to operate effectively at the low levels of abundance of Kenai River late-run king salmon that we have seen for the past four years. “Normal” conduct, that is fishing the ESSN fishery in accordance with the abundance of sockeye salmon as prescribed in the Late-run Sockeye Salmon Management Plan, can easily take the entire harvestable surplus of late-run king salmon and leave few if any fish available for the sport and guided sport fishery. Without significant restrictions, the ESSN harvest could prevent achievement of the escapement objective at these low levels of abundance even without a sport fishery. This outcome is clearly unacceptable. ADFG was forced to step outside the existing plans in 2012 to enact restrictions and closures for all major harvesters of king salmon in order to meet established escapement goals.

The science on king salmon biology tells us that low abundance of king salmon is the new reality for at least the immediate future. It is rash to expect that ADFG will approach its salmon management for the 2013 fishery season with any less concern for kings than it did in 2012. However, we are hearing lots of support for what folks (not KRSA) are calling “fishing based on abundance” at meetings and in the media. This is pretty much code from commercial sockeye fishing interests and advocates for ignoring the realities of low king salmon abundance and gutting any and all conservation / allocation measures in the UCI salmon management plans.

This “solution” calls for removing windows in the sockeye management plans, keeping regular commercial fishing periods regardless of king returns and fishing the ESSN fishery hard when sockeye are on the beach (through the use of emergency openers). Then, if too many king salmon are taken by the ESSN fishery and the escapement objective (or whatever index) is in the red, these folks think that ADFG should just take up the slack by implementing further in-river restrictions, be it going to drift boats only river wide, increasing the size of the in-river sanctuaries, and /or restricting what’s left of the sport fishery to catch and release only. Such actions in their view would allow the ESSN to return to “normal” regardless of king salmon abundance. This naive “solution” is not a viable resolution to the issue of low king returns. It fails to protect king escapements, share the burden of king conservation equitably, or protect the economic viability of both the commercial and sport fisheries.

Clearly, “fishing based on abundance” in years of low king returns needs to consider the abundance of king salmon, not sockeye salmon alone. The first step in developing a sustainable fishing strategy will be to use the science to determine what level of harvest is appropriate given the low numbers of fish. Then we must decide what proportion of this acceptable level of harvest should go to a limited sport fishery consistent with management plan direction that king stocks are to be managed primarily for sport and guided sport. What is left should be available to the commercial fishery.

The 2012 fishery demonstrate that the UCI drift gillnet fleet is fully capable of being the primary harvester of sockeye salmon during times of low king salmon abundance. Using the drift fleet as the primary tool for harvest of sockeye salmon, the 2012 commercial fishery generated its third highest ex-vessel value in the past ten years, was able to produce a “normal” harvest of sockeye based on the size of this year’s return, and provided sockeye escapement into the Kenai and Kasilof rivers within optimal escapement goals.

The new reality is that during these times of low king salmon abundance, the drift fleet will remain as the primary harvester of late-run sockeye salmon for the UCI commercial fisheries. More importantly, the abundance of late-run king salmon will be the primary constraint on both the ESSN and in-river sport fisheries.



## **Late-run Kenai River King Salmon Task Force – First Meeting a Mixed Bag, Second Meeting Canceled**

December 4th, 2012

The first meeting of the Kenai River king salmon task force was a mixed bag, with positive signs and also disappointments. On the positive side, the two members of the Alaska Board of Fisheries (BOF) who co-chair the process certainly came to work, the Alaska Department of Fish and Game (ADFG) brought over ten staff members, a sign of their commitment, and the day-long discussions were cordial and respectful. The disappointment comes from two other factors. These are that ADFG is not yet ready to make public the new Didson sonar based escapement objective for late-run king salmon in the Kenai River and the set net representatives seemed to forget what happened in 2012 in hopes that a low enough escapement objective or additional restrictions in the sport fishery will allow the set net fishery to go back to “normal.”

The second scheduled meeting of the task force has been postponed until January when ADFG has indicated that they would be ready to present their provisional Didson based escapement objective. Set net and other commercial oriented interests on the task force voted in unison to cancel the December meeting, one of the three remaining on the schedule, feeling that nothing productive could be accomplished without this new provisional escapement goal. The representatives from KRSA, the in-river guides, and the personal use fishery felt that the cancelation wastes valuable time that could have been productively used to continue the discussion on what management strategies can effectively deal with the conservation concerns for king salmon in times of low abundance while still allowing fisheries some measure of harvest opportunity.

Meanwhile much of the word on the street from east side set netters (ESSN) and other commercially oriented interests has changed from preventing a re-run of 2012 in 2013 to a mistaken notion that there really are not valid management concerns for low abundance of king salmon on the Kenai River. Their narrative, voiced at the first meeting, at the Governor’s announcement in Kenai of \$30 million over the next five years for research funding on the statewide issue of low king returns, and in local media is that either the new sonar goal for late-run kings will be so much lower than the old goal that the problem will simply go away or that the ADFG’s assessment capability is so challenged that they have no idea how many late-run king salmon are returning to the Kenai River and that until they get their act together fisheries, at least the ESSN fishery, should not be restricted. KRSA does not agree with either of these assessments.



Based on all available data describing patterns of low abundance of king salmon in the Cook Inlet area and statewide, a review of the results from the recent state sponsored king salmon symposium, the State's request for a king salmon disaster declaration and Governor Parnell's recent commitment to king salmon research, KRSA believes that low abundance of king salmon is a real phenomenon, at the local, regional and statewide scales in Alaska. Contrarian views otherwise are based on wishful thinking, not science.

Next we will take a look at the new reality of low abundance of king salmon and what it likely means for Cook Inlet fisheries that harvest kings.

## **Primary Purpose of King Salmon Management Plan is to Provide Angler Harvest Opportunity**

November 30th, 2012

Each of the codified management plans that govern important salmon fisheries in Upper Cook Inlet (UCI) contains a purpose statement in its opening section. These purpose statements articulate the goals of each plan. The statements in and of themselves do not direct the Alaska Department of Fish and Game (ADFG) to implement any specific management action but do lay out the overall intent by the Alaska Board of Fisheries (BOF). Each plan then goes on to detail specific actions consistent with this intent.

The purpose statement for 5 AAC 21.359 Kenai River Late-Run King Salmon Management Plan states: *the purposes of this management plan are to ensure an adequate escapement of late-run king salmon into the Kenai River system and to provide management guidelines to the department. The department shall manage the late-run Kenai River king salmon stocks primarily for sport and guided sport uses in order to provide the sport and guided sport fishermen with a reasonable opportunity to harvest these salmon resources over the entire run, as measured by the frequency of in-river restrictions.*

The purpose statement for 5 AAC 21.360 Kenai River Late-Run Sockeye Salmon Management Plan states: *the department shall manage the Kenai River late-run sockeye salmon stocks primarily for commercial uses based on abundance. The department shall also manage the commercial fisheries to minimize the harvest of Northern District coho, late-run Kenai River king and Kenai River coho salmon stocks to provide personal use, sport, and guided sport fishermen with a reasonable opportunity to harvest salmon resources.*

The BOF has formed a Kenai River king salmon task force to examine strategies for managing the UCI salmon fisheries during these times of low abundance of king salmon, particularly late-run Kenai River king salmon. Since the purpose statements are sections of the codified

regulations, they provide specific direction to the task force and should be taken literally until otherwise directed by the Board. The charge for the task force is to identify reasonable alternatives for managing fisheries during times of low abundance, not to re-engineer the entire approach to UCI salmon management.

For late-run Kenai kings this means: 1) the escapement objective needs to be met, 2) king salmon are to be managed primarily for sport and guided sport fishermen, 3) sport and guided sport fishermen should be provided with a reasonable opportunity to harvest kings over the entire run, and 4) in-river restrictions which preclude reasonable opportunity should be infrequent. The in-river sport fishery normally starts the season on July 1 with single hook, bait and retention of kings with no area restriction for retention and runs through July 31. In typical years with no restrictions on harvest opportunity the in-river king salmon sport fishery can harvest between 7,000 to 15,000 or more kings during the month of July.

2012 was a year of unprecedented low king returns, when all king salmon fisheries in the Cook Inlet area faced severe restrictions. Due to concerns over indicators of low abundance of the early-run to the Kenai River, all other river systems in Cook Inlet and most other major kings returns statewide, ADFG put pre-season restrictions on the harvest opportunity of late-run Kenai River king salmon for in-river anglers. The use of bait was disallowed and the river was closed to king retention above Sunken Island, which eliminated two-thirds of the available in-river fishing area to harvest. By July 10 catch and release restriction was implemented for the whole river and by July 19 the in-river king fishery was closed for the season.

Fewer than 300 late-run kings were harvested in July by the Kenai sport fishery, while the combined harvest of kings in the commercial fisheries is estimated near 900 (700 east side set net / 200 drift). The preliminary 2012 DIDSON based sonar estimate was 21,500, which according to ADFG is higher than escapements in 2010 and 2011. Escapement would have been much lower without restrictive management actions taken before and during the season in the sport, personal use and commercial east side set net (ESSN) fisheries.

At the present low levels of abundance of late-run king salmon, normal prosecution of the ESSN commercial fishery would take all or more than the entire harvestable surplus, leaving no fish for the sport fishery and jeopardizing achievement of the escapement goal. That is absolutely inconsistent with the purpose statement of the Kenai River late-run king salmon management plan. If there is a limited number of surplus late-run king salmon the sport and guided sport fishery should be allowed harvest opportunity first. Restricting the sport and guided sport fishery to catch and release only while allowing the ESSN fishery to harvest hundreds or thousands of late-run king salmon is entirely contrary to existing plan. The ESSN fishery should be the first to give up harvest of late-run king salmon in years of low king abundance.

The ESSN fishery as presently configured and managed cannot reduce harvest of late-run king salmon without also giving up harvest opportunity for late-run sockeye salmon. The late-run sockeye salmon management plan states that sockeye should be managed primarily for commercial uses. It does not state that these stocks should be managed primarily for the ESSN fishery. The drift gillnet fleet did a fine job of harvesting sockeye salmon during the 2012 season and should remain the primary “tool” for this purpose. A drift gillnet fishery corridor was adopted by the Board in 2011 specifically to focus commercial harvest on strong Kenai sockeye runs and this measure should continue to be effectively employed.

If the limited harvestable surplus of late-run king salmon can satisfy the primary purposes of the king plan then the ESSN fishery should be given an opportunity to fish only so long as their harvest of late-run king salmon is minimized, does not result in harvest restrictions of the sport and guided sport fishery and does not jeopardize the escapement objective.



## Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

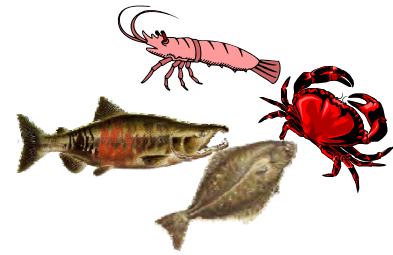
Juneau, AK 99801

Phone: 907-586-6652

Fax: 907-523-1168

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

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



March 4, 2013

Boards Support Section  
Alaska Dept. of Fish and Game  
PO Box 115526  
Juneau, AK 99811-5526

RE: March 2013 Statewide Board of Fish Proposals

Dear Chairman Johnstone and Board of Fish Members,

Below are Southeast Alaska Fishermen's Alliance (SEAFa) comments on statewide proposals before you in March. SEAFa is a multi-gear/multi-species membership based commercial fishing association with approximately 300 members. Our members are mainly involved in the salmon, crab, and shrimp fisheries of Southeast Alaska/Yakutat region and longline fisheries around the state. Our membership is 86% Alaskan and most typically participates in a diverse array of fisheries as well as sport, personal use and subsistence fisheries. Due to scheduling conflicts, we are unable to attend the March meeting in Anchorage but hope if you have any questions about our comments that you will contact us 907-586-6652.

### **Proposal 215: OPPOSE**

SEAFa opposes this proposal that would set up a statewide regulation prohibiting any user group to receive 100% right to harvest all fish in any area. This is the type of issues that need to be looked at on individual area/region basis and by using the allocation criteria. Adoption of this proposal would severely effect Southeast Alaska hatchery program where two of hatcheries do all of their cost recovery in a single area which is supported by the Southeast fishermen.



**Proposal 216: OPPOSE**

SEAFa opposes this proposal. There is already in the Constitution the mandate to manage for sustained yield which means that escapement takes priority. There are also regulations in effect that has escapement as a priority and in the Dept. comments (RC 2) they state that adoption of this proposal would unlikely change current management.

**Proposal #217: OPPOSE**

SEAFa opposes this proposal and supports the Dept. position and staff comments in RC 2, page 8. This proposal is in conflict with the *Policy for the Management of Sustainable Salmon Fisheries*. Raising king salmon escapement goals 2% every year over the next 15 years takes away the biology of individual streams and imposes artificial mandated number. Part of the problem with king salmon escapements in around the state are that the weirs and sonar stations counting the escapement levels are below where sport, personal use and subsistence fisheries take place, this in turn means that there is truly less escapement then assumed.

**Proposal #218: OPPOSE**

SEAFa opposes this proposal requiring a SET goal to be established for any stock of concern. Southeast Alaska has had several systems listed as a stock of concern that were later delisted. The establishment of SET goals would not have made any additional difference to the management of the fishery or the action plan that was developed by the Board of Fisheries. The SSFP states that a SET would be established "as needed" by the Dept. in consultation, let the Dept. determine when a stock is in such jeopardy that a SET should be established.

**Proposal #219: OPPOSE**

SEAFa opposes this proposal to provide definitions of terms that are already defined in 5AAC 39.222

**Proposal #220: AMEND and SUPPORT**

SEAFa supports the deletion of outdated modes of operation and inserting newer technological methods of communication with the amendment of adding email in 5AAC 28.020(c).



**Proposal #221: SUPPORT**

SEAFa supports this proposal to remove the unnecessary reference to federal regulation that causes confusion regarding groundfish possession and landing requirements.

**Proposal #222: SUPPORT**

SEAFa supports the proposal that would allow failure to have in possession or show proof of identification to a lesser standard of a strict liability offence rather than a misdemeanor.

**Proposal #223: SUPPORT**

SEAFa supports this proposal that clarifies the language that you can change a salmon vessel registration within the current year if it hasn't been fished in another area.

**Proposal #224: SUPPORT**

SEAFa supports this proposal that updates today's methods of communications the distribution of emergency order announcements (EO).

**Proposal #225: OPPOSE**

SEAFa believes that there is a process in place for considering permit stacking proposals. Most permit stacking proposals are considered a restructuring proposal where additional information is requested or becomes a logical outgrowth of the committee and board process.

Proposal #226: No position/comment

**Proposal #227: SUPPORT**

SEAFa supports this proposal submitted by ADFG that allows flexibility in the management of sport proxy fishing to reduce fishing by methods and means if necessary in a time of concern for a stock.

**Proposal #228: SUPPORT**

SEAFa supports ADFG's proposal to prevent the act of high-grading in the sport fishery by keeping a fish alive and swapping it out when a more desirable fish is caught.



**Proposal #229: SUPPORT**

We support the Dept's proposal to require angler who replace or purchase multiple sport fishing licenses to be required to transfer their information from the previous license or harvest record card.

**Proposal #230: SUPPORT**

While the Dept's proposal #229 is a step closer to dealing with this issue, SEAFA believes that Proposal #230 is actually a better solution. Right now the perception is that some multiple licenses are used to allow an individual to get around annual limits. This solution would completely end that practice and can be done simply by having a vendor when issuing a duplicate license be required to write across the back in indelible ink DUPLICATE. This would negate the Dept's comments about the need for additional cost and a different license. If an individual knew if he lost his sport fish license he would be prevented from keeping species with annual limits, he would be much more careful with his license.

**Proposal #231: SUPPORT**

SEAFA supports providing a definition of "compensation" in regards to sport fishing guiding services.

**Proposal #232: SUPPORT**

SEAFA supports the Dept's proposal to clarify what sport caught fish can be used as bait on a statewide level as well as allowing the Board the flexibility to allow other species with harvest limits to be allowed on a regional basis such as pink and chum salmon in Southeast Alaska.

Proposal #233: No comment or position

**Proposal #234: OPPOSE**

SEAFA wrote in opposition to this idea on country wide basis when published in the federal register, we oppose it on a state-wide level.

**Proposal #235: SUPPORT**

SEAFA has always supported more timely, accurate and thorough accounting of sport, personal use and subsistence fisheries. We were impressed by recent online reporting of wildlife harvests and believe this is something that should be discussed and the Board should encourage the Dept. and





legislature to consider changes to the current system. Accurate reporting of where fish is being caught and how many is critical to sustainable management of the fisheries and becomes more important as the population grows.

**Proposal #236: OPPOSE**

SEAFAs opposes this proposal to assign definitive points on a weighted basis in place of the current allocation policy and criteria. The current system allows for flexibility and for subjective analysis by the individual board members. While SEAFAs doesn't always agree with the conclusions by a board member, we believe the system has worked over time to the benefit of the State in management of the resource and is a better system than exists in other parts of the country where management occurs by the legislatures.

Proposal #237, 238, 239, 240, 241, 242: No comment/position - out of area

**Proposal # 243: OPPOSE**

SEAFAs opposes the proposal to modify the *Forage Fish Management Plan* by adding in herring. Our opposition is based on several factors.

- We don't believe that a board generated proposal should have been generated from an ACR that did not meet the criteria or a proposal that the Dept. of Law identified as a late proposal. An individual should not be rewarded for submitting a late proposal. This proposal could easily have waited until the next cycle for submittal since waiting does not jeopardize any conservation of a stock.
- SEAFAs supports the current *Forage Fish Management Plan* and the original intent and well-thought out reasoning for the management plan to highlight and prevent commercial fisheries from developing on forage fish that had a lack of biological information/management plan. (See department background comments in RC 2 page 13-14)
- If the board wishes to change the *Forage Fish Management Plan* by adding in herring because it is a forage fish, then all species that are considered a forage fish should be added in at the same time (for example pollock, juvenile rockfish). There is no logical reason that in this instance you would add only herring or even other forage fish species unless there is an underlying reason for the action.





Proposal #244, 245, 246 - out of area

**Proposal #247: OPPOSE**

SEAFa opposes any action taken on this board generated proposal for closing a portion of the Tsui River to commercial fishing. Our first objection to the proposal is that we believe that it never should have been a board generated proposal when it failed to meet the criteria of an ACR at the October work-session and is the same language as the ACR. We have listened to the record of the work-session and this proposal was generated on the basis that the commercial fishery is a disorderly fishery based on some U-Tube video links provided in RC 18. Yet, the labeling of many of the U-tube videos provided in RC 18 of the October work-session is clearly marked as non-commercial fishery days. How can a fishery be disorderly when it isn't even open? At that time, it is a private individual in their skiff. If there is unsafe behavior occurring on the river, this is not a board of fish issue but an enforcement issue and should be reported to the appropriate authorities. It is our understanding that there were not any complaints filed regarding these incidents. The Tsui River is a constantly changing river with no conservation concerns and is very important to the commercial set-net fishermen of Yakutat, typically providing 35-40% of the Yakutat commercial coho harvest.

**Proposal #248:**

After discussing this proposal with Capt. Cain and reviewing the language being proposed, we believe we understand the issue and when publishing this regulation in the books, you should provide the definition of freshwaters within this regulation. Understanding the definition of freshwaters made a large difference in my understanding and comfort of this proposal.

**OTHER ISSUES:**

SEAFa would like to comment on the start of a policy for "Board Generated Proposals." Our recommendation is that additional criteria be adopted:

- A proposal that is submitted late but during the appropriate cycle and is not a conservation concern and is basically allocative in nature is not appropriate for a board generated proposal; and
- An Agenda Change Request Proposal that is denied or no action taken on because it fails to meet the criteria for consideration out of cycle is not appropriate for a board generated proposal.



In addition, we would like to see the Board highlight at each of the regulatory meetings for the next full cycle (3 years) and allow every area of the state to comment as the policy develops and take final recommendations at the Statewide meeting 3 years from now.

Sincerely,

A handwritten signature in black ink that reads "Kathy Hansen" followed by a long horizontal line.

Kathy Hansen  
Executive Director



3/1/2013

Dear Chairman Johnston and Members of the Board of Fish,

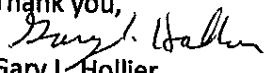
I would like to submit some comments for the Statewide IIOF meeting to be held March 19-24.

I want to thank the BOF for setting up the Cook Inlet Task Force. I think it was productive. The end product although not perfect it seems to meet the intent of the TF in defining some parameters if there is a King Salmon conservation concern for the Kenai River in 2013. I like the July 21 trigger date. I like during times of low abundance that a 13,000 OEG would be set. I like that ADF&G would have the flexibility to fish for sockeye when they are abundant on the beaches. For my fishery, as an ESSN fisherman, 2012 was an emotional, economic nightmare. With this plan hopefully 2013 will turn out better than 2012.

On other State wide proposals I am against # 216, which would limit the Commissioner's Emergency Order authority. When making regulations the BOF tries to think of all possible ramifications that might occur in a fishery. There are times when unusual circumstances occur. Last year in Cook Inlet was a prime example. I think it is imperative for the Commissioner to be able to re-act in-season, with E.O. authority.

I am also against the BOF setting more stringent guidelines when it comes to permit stacking, proposal 225. I listened yesterday, on-line, to the "stacking" issue in Bristol Bay. Their issues are different than Kodiak or Cook Inlet. Resident participation, latent permits, economic viability of the fishery, intent of CFEC is issues that are different in each area. I think each fishery needs to be looked at individually. They should be addressed at each fisheries regular cycle. I feel the maker of this proposal, Kenai River Sportsman Association, is trying to set the stage for this issue when it comes up at the Upper Cook Inlet meeting in 2014. It should be addressed at that time.

Thank you,

  
Gary L. Hollier

Kenai, AK



March 5, 2013

Alaska Board of Fisheries  
Board Support Section, ADFG  
ATTN: Monica Wellard  
PO Box 115526  
Juneau, AK 99811-5526

**Delivered via FAX: 907-465-6094**

RE: SCADA comments on Proposal 249 at the 2013 Board of Fisheries (BOF)  
Statewide Finfish meeting

Dear Board Johnstone and members of the Board of Fisheries:

Please see my final comments to the Cook Inlet King Salmon task force regarding our work.

My name is Dennis Gease. I represent the Personal use Fisheries (PUF). We're the new kids on the block. However, we do represent the most people involved in any of the fisheries. Last year we had over 35,000 Alaskan citizens who were issued PUF registration forms. The great majority of these Alaskan citizens exercised their right and privilege to partake of this fishery on , or near the Kenai and Kasilof Rivers .. As most of you know, this fishery normally runs from July 10th thru July 31st.

As the Vice President of SCADA ( South Central Alaska Dip-netting Association ) I have been in contact with a number of our members , and a large majority have no problem in the step down of “ no retention of King Salmon ” [when the upper escapement goal is less than 22,000 but greater than 15,000 ].

However, there are 2 points we have some issue with.

The first is the issue of windows. This is the only fair chance we have of fish getting to the rivers. Like anyone, we don't want to stand out in the cold water all day waving a small net around in the hopes of catching a fish when there aren't any. This is why the week-end windows are especially important. There's a good chance fish will show up



Another issue brought up by a number of ESSN's is the right to fish when the fish hit the beach, or when there are pulses of incoming fish. I represent a large group of people that feel the same way. We want to be on the beach under the same scenario when dip netting or when I'm out on the river fishing for a King or Silver it would be a dream come true if I knew there were some fish ( pulses ) coming into the river so we too could be guaranteed to catch fish.

With all that being said, I would like to restate what I mentioned in our first meeting which has not been mentioned since I was under the impression that this task force was formed to hopefully come up with some ideas that if the King Salmon return is as low or lower than last year , that we could help the ESSN to possibility fish more than last year ,at least try some ideas that would preclude the capture of King Salmon.

A number of items were mentioned, among them

- a. Discussion on net size?
- b. Vary the distance from shore?
- c. Width of net? Depth of net?
- d. Flag fishing?
- e. Brent Johnson had some ideas that could have been pursued that might have merit.

I'm sure there are other ideas out there that could possibility work. However, all I've heard so far from the ESSN position is that

1. We don't want windows!!!!
2. We want to fish when the fish are on the beach!!!! (pulse fishing )

If the same scenario happens again this summer, does anyone honestly think these two solutions are going to help the ESSN catch less kings and accomplish the objectives of this task force and our overall low abundance of returning KING SALMON????? I personally don't think so!!!!

We have put men on the moon -- Our technology has advanced so much in the last ten years it's scary. I truly believe there has to be some way to net Sockeye without netting King Salmon. Doing the same thing, the same way, as we have for the last 25 or more years is not going to work anymore. There needs to be a better way



Reread our Mission Statement:

Recommended adjustments ...best mix of fishing opportunity, while providing the best means of attaining the escapement goal for KENAI RIVER late run CHINOOK SALMON during low KING SALMON abundance as experienced in the 2012 season.

In closing, I wish to thank the board of fish for their interest in our fisheries problems that are happening here in our midst.

Special thanks to Vince Webster and Tom Kluberton for chairing these meetings and overseeing the complexities of such a get together.

To the members of Alaska Fish and Game who were especially helpful during this time and it was so greatly appreciated.

I would also like to thank my fellow task force members for their input into this proceeding. We all know that this is a very complex and delicate problem for all of us. I would like to compliment everybody for their politeness, civility and in many instances your humor. We will not all agree on everything, however we can agree to disagree at times and always remember; a good marriage is based on COMPROMISE.

THANK YOU

Respectfully,

Dennis Gease, Vice President  
South Central Alaska Dipnetters Association



From: Cordova Dist. Fishermen United 907 424 3430

03/05/2013 16:03

#958 P.002



Cordova District Fishermen United  
PO Box 939 509 First Street Cordova, AK 99574  
phone (907) 424 3437 fax (907) 424 3430  
web www.cdfu.org email cdfu@afgnv

**RECEIVED**

**MAR 05 2013**

**BOARDS  
ANCHORAGE**

Karl Johnstone, Chair  
Board of Fisheries  
Board Support Section  
PO Box 115526  
Juneau, AK. 99811-5526

RE: Board of Fisheries Statewide Proposals Comments

Dear Mr. Johnstone,

Cordova District Fishermen United is one of Alaska's longest standing fishermen organizations, representing 800 fishers and their families in the Prince William Sound region. CDFU greatly appreciates the opportunity to comment.

Proposal 215: Criteria for the allocation of fisheries resources among personal use, sport, and commercial fisheries. **OPPOSE-** This proposal encompasses too many situations in one broad statement. It should be addressed to the specific region in which the problem is perceived. As written, it would have far reaching unintended consequences. There are many areas in which only one user group harvests aquaculture resources such as remote hatchery locations.

Proposal 216: Require statewide adherence to salmon fishery management plans. **OPPOSE-** This proposal would establish the achievement of escapement goals as the primary management objective and takes priority over provisions in any specific management plan. This is a Cook Inlet issue being applied on a statewide level. It restricts the ability of the Department of Fish and Game to manage. The Department has adequate tools to manage state resources. This restriction would have far reaching unintended consequences.

Proposal 217: Mandate statewide priority for the management of king salmon. **OPPOSE-** This proposal would establish king salmon stocks as the Department's management priority. It does not take into account annual variability in salmon returns. It would unnecessarily restrict management flexibility. The State recognizes that Chinook numbers are down statewide is currently implementing a statewide response strategy.

Proposal 218: Establish an SET for stocks listed as yield or management concerns. **OPPOSE-** The Department already has clearly defined criteria for establishing a stock of concern. Establishing SETs for every stock of concern would divert tremendous time and resources from the Department and negatively impact it's ability to performs it's primary functions.

Proposal 219: Define terms including "maximum sustained yield", "optimum sustained yield", "sustained yield" and "mixed stock fishery". **OPPOSE.** This proposal creates a confusing redundancy as definitions are currently found in regulation at 5AAC 39.222.





From: Cordova Dist. Fishermen United 907 424 3430

03/05/2013 16:04

#958 P.003

**Cordova District Fishermen United**

PO Box 929 | 509 First Street | Cordova, AK 99574  
phone (907) 424 3447 | fax (907) 424 3440  
web www.cdfu.org | email.cdfu@ak.net

Proposal 220: Allow groundfish registration by fax, telephone or e-mail. SUPPORT. We support the Department's desire to streamline registration processes.

Proposal 222: Require a CFEC permit holder to provide proof of ID when attempting to sell fish or at the request of a peace officer. SUPPORT-

Proposal 223: Specify area registration requirements for salmon net fishing vessels. SUPPORT- Housekeeping.

Proposal 224: Revise EO announcement process to add email or fax as a means of notification. SUPPORT- Housekeeping.

Proposal 225: Develop and require use of a statewide policy during consideration of permit stacking proposals. OPPOSE- Each area has it's own distinct requirements. Individual areas have different management and historical practices that have resulted in the current regulations. Permit stacking proposals should continue to be considered by specific fishery.

Proposal 235: Establish mandatory reporting requirements for statewide sport fisheries. SUPPORT- This is a sustainability issue. We support accountability for all user groups.

Proposal 236: Establish allocation priority with assigned point values to a user group as part of a weighted system when making allocation decisions among user groups in salmon fisheries. OPPOSE- This proposal places an arbitrary constraint on the Board's ability to address complex allocation decisions.

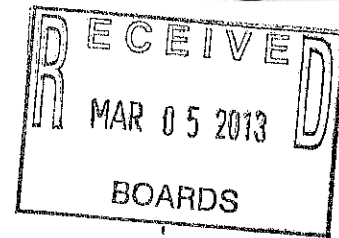
Proposal 243: Add pacific herring to the forage fish management plan. OPPOSE- We oppose the addition of pacific herring to the forage fish management plan because it would create a conflict between the 1999 forage fish management plan's prohibition on the commercial taking of forage fish and the long standing, well managed, and sustainable commercial herring fisheries.

Proposal 247: Modify closed waters in the Tsiu River for the Yakutat salmon fishery. OPPOSE- This is a Board generated proposal created from an agenda change request that was voted down by the Board in Fall 2012. We oppose the adoption by the board of an ACR that is purely re-allocative. There is no conservation concern as the Tsiu has met it's escapement goals consistently. We oppose the consideration of allocation proposals out of cycle.

Thank you again for the opportunity to comment on these proposals.

Sincerely, Curt Herschleb  
Vice President, CDFU





March 5, 2013

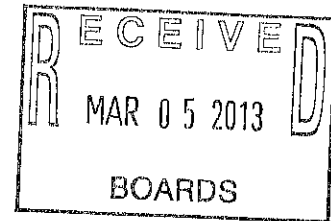
Monica,

The Following 63 pages are my public comment for Proposal 247 for the upcoming statewide meeting.

I have emailed them as well. Please let me know if you receive them.

Thanks and have a great day!

Dan Ernhart  
PO Box 1403  
Cordova, AK 99574  
218-252-2337



I am not in favor of proposal 247 *AS WRITTEN*.

The Lodge Owners are not in favor of proposal 247 *AS WRITTEN*.

The Lodge Owners want some meaningful changes that will stop the exodus of guests because of the boat herding activities.

No one has a problem with commercial netting in the Tsiu River.

Everyone is in agreement that the boat herding activity is the problem.

The upper part and the lower section of the river are considered traditional.

There is concern about closing off areas that have been traditionally harvested.

The center part of the river is best for commercial netting and herding.

First off I think definitions of terminology would be a good idea. Upper, Middle and Lower sections of the river. Lower is the area that is tidally affected (about the first 25%). Middle is the next 50% of the remaining river and the upper is the last 25%.

1. Everyone knows that the silvers do not hold in pools in the first mile or so of the river. They just move through this area.
2. Sometimes this first section of the river is unusable by either group because of heavy rain and water conditions.
3. No matter where the nets are placed the fish will run into them because of the nature of this shallow, narrow, single channel river.
4. And because of this the first 3 or 4 nets usually catch the majority of the incoming fish.

Last year no one put nets in the first 1.2 miles of river or most of the upper section. With nets in only the middle section they harvested about 45000 in 6 openers. In a normal 12 opener season they harvest about 40000. Why was that? Well, there was a little more water than normal but the mouth was fishable by any standard. The sports were there every day. But what the harvesters are figuring out is that it is way easier to wait for the fish to get to the holding pools to get them. Less current, no moving sand to bury their nets, no seals tearing up their nets, the fish are more stagnant and tired, they stack up in small areas and it is closer to the DC3.

They didn't fish the upper area because by the time most fish make it that far they are turning color. There is no, or very little value (.05 last year, .00 previous 2 years) in red fish. And now that everyone is watching, the indiscriminate wanton waste that had been taking place is not acceptable so they will stay away from areas that hold large amounts of blush and red fish.



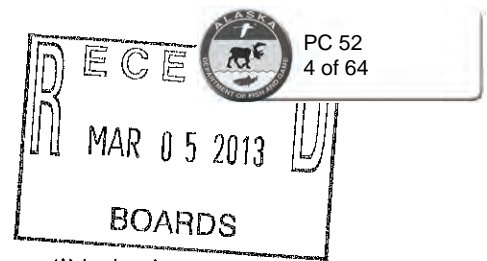
Another thing that happens is what I like to call the train effect. When there are lots of fish in the upper section of the river the fish coming in behind them tend to stop and wait for the ones in front of them to move on before they move up. I watch this happen every year. So by leaving the upper section commercial free is like putting a stop sign in the river. A majority of the new fish will stop in the middle section making it easier to harvest fresh fish without the fear of them just swimming by on the days they are not netting.

This is exactly what happened last year. Even with all the extra water the fish were stopping in the middle due to all the fish holding in the upper section. And believe me, there were lots of red fish in the upper section. We fished it almost every day. Yes some fish move on but by cleaning out the entire river every opener leaves no fish to stop the new ones from just swimming on up to Duck Camp Island. Once they get to this point the river splits and they start to fan out and go separate ways out of reach of the sport fishers.

The belief that fish come in on every tide is just totally wrong. There are times every season that they come in every other day. Sometimes not come in at all for 2 or 3 days. When you are sport fishing every day all season for 20 years you start to see patterns. And yes, I guide 7 days a week, 40 to 50 days in a row. We have 5 guides that have been on the river for 10-20 years each. Longer than any other lodge has existed and longer than most current harvesters. We have a pretty good handle on what's happening on a daily basis.

Let's talk about traditional uses. I am all about history and the native culture and traditional, historical uses in Alaska. I respect them as much as anyone as long as they respect the land and what it offers as well. I completely understand that this river has a long, multigenerational history. There are claims that the upper section is traditional use and the mouth is traditional use. OK, fine. But what about the middle section? That never existed 50 years ago. And not much of what is there today even existed 10 years ago. Mother Nature is constantly changing this river. In the last 30 years another user group has emerged. An extremely valuable group that has the same right of equal access to this public resource as the traditional harvesters. In that 30 years the area sports could go to get away from the commercial activity has completely disappeared while the area available to harvest has grown 300%. I understand change is hard and frightening to some. People have to be willing to accept what Mother Nature has done and change with it. Times change. As with the way fish are harvested. There never used to be jet units, much less 90 hp ones herding fish or 800 cc ATV's or turbine otters. Along with change comes responsibility.

I have yet to hear anyone say that the changes we are talking about will reduce the commercial harvest. It's just a perception that they are losing something. Even the 40 year fishery manager agrees that no matter where the nets are placed the harvesters will get their fish. That really is



the bottom line. No one is going to get hurt and actually the changes will help the community of Yakutat by letting sport fishing flourish on this golden goose of a river.

The Yakutat AC chair says that the whole intent here is to limit exposure time between user groups. Well, that is a reason but not the whole intent. My reasoning is to have equal access for all users with no one group having priority access. Responsibly sharing the resource is my priority. Making sure all traditional, current and future users, physical, social and economic changes are taken into consideration when making resource decisions. And when you make decisions based on this you will see positive results, prosperity and less conflict will ultimately be the end result.

Assuming that any changes will result in more or less openings is just that. An assumption. The fisheries manager will decide that upon review of the catch and escapement. I have seen 1- 24 hr opener in a week and have seen 7 -24 hr openers in a week. The numbers will decide.

Hopefully you see that I have more than just a self serving interest here. I really do want what's best for all users. With happy people comes less conflicts. So with that said, I believe the what's in the best interest of the traditional users as well as the current and future users is to allow netting in the entire current area as in regulation but outboards to be used in the middle section of the river only. The lower and upper river to be outboard free. This will keep traditional uses intact and keep conflicts minimized while allowing everyone to use the resource to their benefit.

I would like to comment on the rationale that the harvesters are giving up something so what do they get in return...

1. The sports have lost their commercial free area. For the last 8 years we have been forced to fish in the main channel with the harvesters. This has resulted in businesses being shuttered and the loss of many long time guests that will never return until something is done about the ever escalating conflicts. Which has resulted in massive revenue losses and wages. Hurt relationships with clients that will never get healed and the added expense of going out and finding new customers.
2. There is a danger factor with high speed boats navigating small channels with people standing in them.
3. The harvesters have continued to capture the same amount of fish during these years. While their area has increased dramatically. No economic loss to them.
4. The residual benefit will be in increased taxes to Yakutat.

The sport fishers have already given up a tremendous amount. This is a way of getting things back in line with the way they were.



Finally, the thought of the river getting shorter... Well, we are all in this together. The river gets longer we all benefit, the river gets shorter we all suffer. Again, no one user group has priority.

So my argument is this:

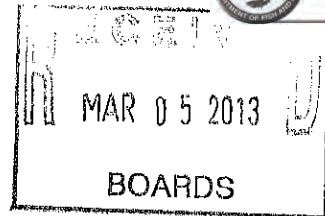
1. In the last 50 years Mother Nature has changed the river in a way that has completely eliminated the area above the boundary where sport fishers were able to go to escape the commercial activities.
2. And during that same time has added 500% to the commercial harvesting area.
3. The historical catch data states that no matter what the length of the river the netters harvested about the same amount of fish each year.
4. In the last 30 years a new, extremely valuable user group has emerged.
5. Millions of dollars of infrastructure have been put in place to service this group.
6. The changes in the river have caused undue hardships on this user group.
7. It is the Boards responsibility to maintain orderly fisheries and utilizing the resource to its maximum potential while keeping sustained yields for future returns.
8. The residual effect of making incremental changes will be happier people so less conflicts and the enforcement issues will mostly go away. Keeping the cost of enforcement to a minimum.

Obviously the fishery is not being utilized to its maximum potential. The sport users should not have to wake up in the morning wondering if there will be any fish in the river or where are they going to be able to fish today depending on what the harvesters are doing.

The bottom line is that with some meaningful changes no one is going to get hurt. And actually the city of Yakutat will benefit with an increased tax base. So what changes can happen so that there is equal access for all users, keep the traditional users in the areas they believe are traditional, no one gets hurt in the process and actually create a better environment for everyone?

FACTS:

- a. Traditional and historical areas include the mouth and the upper part.
- b. Traditional and historical uses do not include jet boats to herd fish.
- c. Boat herding is detrimental to the lodges.
- d. With boat herding, the first 3 or 4 nets harvest a very high percentage of the new, incoming fish. When done at the mouth, this cuts off other users from equal access to the resource.
- e. The fish do not stop in the tidal area. They move on to the center of the river to rest in non tidal pools.
- f. The center of the river is the best place to harvest fish.

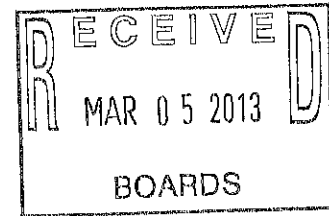


SOLUTIONS:

- a. No boat herding of fish in the entire river. But still run boats around to service nets. This will make harvesting a little slower and not as efficient.
- b. Cut river in half no matter what the length. Boat herding in the lower and no netting at all in the upper. This causes a traditional area to be cut off.
- c. Net entire river but no motorized boats in the traditional areas of the mouth and the upper section.
- d. Net entire river with no motorized boats in the upper half.
- e. Net entire river with no motorized boats in the lower half.

Letter c. makes the most sense to me. All users can utilize the resource as they wish without feeling harassed or molested. And have equal, unbiased access.

Dan Ernhart  
PO BOX 1403  
Cordova, AK 99574  
218-252-2337



I have about 100 videos. These are just the highlights.

Wanton waste videos:

- 060 - <http://youtu.be/B34qkHvDsi0>
- 062 - <http://www.youtube.com/watch?v=hhcR4-Xte5k>
- 064 - <http://www.youtube.com/watch?v=k7IGfNnvah4>
- 065 - <http://www.youtube.com/watch?v=MHGijj7ZCqk>
- 066 - <http://www.youtube.com/watch?v=QNAAnNWHdb3U>
- 067 - <http://www.youtube.com/watch?v=ogw3NEgPFT4>
- 071 - <http://www.youtube.com/watch?v=QZ1UI0YHIOs>

Non Harvesting days:

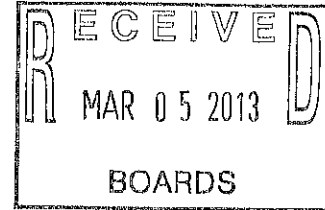
- 002 - <http://www.youtube.com/watch?v=UEubUFG1h9U>
- 003 - <http://www.youtube.com/watch?v=F2eDLFnBsbw>
- 088 - <http://www.youtube.com/watch?v=w6c8shr-Ys>
- 089 - <http://www.youtube.com/watch?v=RDNBc5O70j4>

Harrassment:

- 008 - <http://www.youtube.com/watch?v=40gVmipCDKY>
- 038 - <http://www.youtube.com/watch?v=mW4oJlkCr7E>
- 092 - <http://www.youtube.com/watch?v=yVLgmlhzLAE>
- 083 - <http://www.youtube.com/watch?v=ulQH9CsHLRU>
- 084 - <http://www.youtube.com/watch?v=SzU-QGkIBuA>
- 073 - <http://www.youtube.com/watch?v=QMjQHOB6ZE>

Small Channel /Fast Boats:

- 039 - <http://www.youtube.com/watch?v=Recc5XebuAQ>
- 040 - <http://www.youtube.com/watch?v=TqNnZ-q74Nc>



041 - <http://www.youtube.com/watch?v=6QluNgeIECI>

Misc Clips:

050 - [http://www.youtube.com/watch?v=vxK\\_7HtOCpM](http://www.youtube.com/watch?v=vxK_7HtOCpM)

094 - <http://www.youtube.com/watch?v=DHFdWNkKG0c>

Illegal Nets:

022 - <http://www.youtube.com/watch?v=REx2QoJ33XU>

023 - [http://www.youtube.com/watch?v=-SZhSdncg\\_8](http://www.youtube.com/watch?v=-SZhSdncg_8)

Use of Public Land With No Leases

712 - <http://www.youtube.com/watch?v=X55VWbX8mNY>

709 - <http://www.youtube.com/watch?v=9QmRM7c3vio>

Perfect Day:

075 - <http://www.youtube.com/watch?v=b5ktHIUx81M>

076 - <http://www.youtube.com/watch?v=RgUxtdsgFE>

077 - <http://www.youtube.com/watch?v=-cyCToiE17E>

078 - <http://www.youtube.com/watch?v=u8mFv37q4qE>

079 - <http://www.youtube.com/watch?v=R4e9hRusYCO>

080 - <http://www.youtube.com/watch?v=mRyeiN3hF7w>

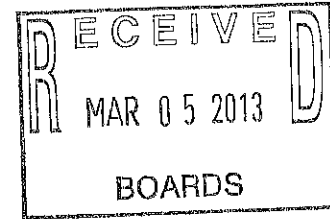
081 - [http://www.youtube.com/watch?v=VTRPGr\\_ACqo](http://www.youtube.com/watch?v=VTRPGr_ACqo)

082 - <http://www.youtube.com/watch?v=DZJQDJGg4s8>





March 14, 2012



Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526  
Chairman of the Board,  
**RE: Tsiu River**

As you read through these letters keep in mind that the authors are rebutting the decision the board made. The major points for the reversal were that blush fish are flown to Yakutat and sold, there is really not a problem between the user groups and that there has been a full time F&G person on site during the season every year. This person has never reported any problems or illegal activities.

First I would like to point out it is my understanding that the F&G person is only there to conduct aerial surveys of the river and count the fish. This happens once maybe twice a week and takes 15 minutes. I am not sure why there has to be someone on site to do this. It seems rather expensive to pay someone hazard pay 7 days a week for 30 min of work when they could just fly in on the same plane that comes there to pick them up to do the survey. I would venture to guess that the air taxi charges the F&G the full amount to fly there from Yakutat to do the survey and back. Not just the 15 minutes the plane is used for the survey. Even though many times they are using that same charter to pick up and/or drop off other people or cargo. Might be worth looking into. I am just speculating, but would be interesting to find out.

Next I would like to address the excessive wanton waste issue. I am sure there is a market for blush fish. But just as in most salmon fisheries the price of fish drops as the season goes along. Soon you have a situation where the blush fish are not worth flying to market. The later you get in the season the more blush fish you have in the river. It is a double whammy. If you look into how many blush fish come in throughout the season you will notice a remarkable drop off later in the season. This is when the most discarded fish are seen. Coincidence?

Finally, the conflict. To say that only one lodge has a problem is just a way to discredit the argument. The truth is that others are probably afraid to say anything. Some are on the edge of going out of business. Several threats have been made against myself, and the lodge I work for. I say, if you're not doing anything wrong there is nothing to be worried about. I know change is hard. But this free for all, cowboy fishery era, has to come to an end. For everyone's safety and benefit. Sometimes common sense has to prevail. I sincerely hope that is the case here.

On the subject of some netters losing traditional netting areas... What about the traditional area that the sport fishers have used? It is now gone due to acts of Mother Nature. Conversely, while the sport area was disappearing, the commercial area has expanded 400% by the lengthening of the river. So is it safe to say that in the last 2 miles of river there are no traditional set net areas?

The bottom line is that the resource needs to be shared. And sport fishing contributes the lion's share of the revenue from the resource. It is to everyone's benefit to responsibly develop this fishery. The management decisions need to reflect the social, economic and physical changes to this area.

Thank you,

Dan Ernhart  
Tsiu River Coalition  
PO Box 1403  
Cordova, AK 99574

Cc: Governor Sean Parnell



Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

RE: Tsiu River

March 13, 2012

When I read that a solution had been reached to allow commercial harvesters to net in the lower half of the Tsiu River instead of the entire fishable stretch, I thought it sounded like an excellent compromise measure that takes into account the perspectives of both groups. When this forward-looking decision was later reversed a few days later, I was extremely disappointed.

I am a longtime fly fishing teacher and author and have been recruiting people to fish with me on the Tsiu River since the late 1980s. I have taken more than 20 such trips and have averaged bringing 10 people per trip. That amounts to at least 200 person/ trips. Many of these people spend \$5000 on their Alaskan experience. So I realize I have influenced upward of one million dollars spent in the Alaskan economy. Much of this has been repeat business. Yet I have already had people lose interest in coming back because the fishing experience has been diminishing. The cause they invariably give is the blatant disregard for other anglers and for the salmon fishery itself that they have seen from some of the commercial fishermen on the Tsiu. Some of this behavior has been well-documented in videos. The commercial fishermen are so effective in harvesting the fish, that there are often few fish to be found in the river on the days when the commercial fishermen are not fishing. And the fish that remain are often too traumatized from boats circling all day to strike.

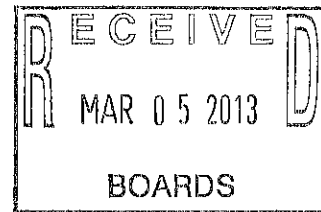
The compromise which was originally passed minimizes the occurrence of such negative experiences while still giving the commercial fishermen the prime downstream water. The "new information," which sounds pretty shaky and possibly contrived, offers solution for only one of the involved groups. So it really doesn't even deal with the problem between user groups. It does nothing but perpetuate the problem. I have seen the salmon all but disappear in California and am already seeing signs of decline in Alaska. What is really sad is that those people who should be most concerned about protecting the future of the fishery—the local people—are the ones whose short-sighted perspective on maximizing harvesting may soon kill off that fishery. Even the robust salmon can only take so much mismanagement.

I strongly urge that the compromise measure be reinstated. If not for a balanced perspective between conflicting interests, then for the future of the salmon fishery itself.

Thank you,  
Dr Alvin Kyte  
57 Corliss Drive  
Moraga, CA 94556

Cc: Board of Fish Chairman Karl Johnstone

Charles A. Pool  
273 San Bernabe Dr.  
Monterey, CA 93940



March 13, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001


Re. Tsiu River

I was greatly saddened to learn that the Alaska Board of Fisheries had reversed its decision concerning Proposal 301 and had taken no action on Proposals 302 & 303 all three of which concern the Tsiu River.

Since the early 90s, I have, with two exceptions, enjoyed sport fishing on the Tsiu River. It is a unique and beautiful river. I have also, on several occasions, shared the fishing with commercial fishermen. On some of those occasions I witnessed behavior on the part of some individual commercial fishermen that was rude, harassing, and an endangerment to sport fishermen.

I recall fishing up river from a female who was standing in the river in her waders fishing a narrow run that was filled with migrating fish. A commercial fisherman powered his boat to the water in front of her and commenced to race up and down herding the fish into his net without any regard to the safety of the female. She barely got of the water before her waders were filled with water from wave action caused by the completely uncivilized behavior of the commercial fisherman.

The fishery on the Tsiu River should be regulated for the benefit of both the sport fishermen and the commercial fishermen. However, what regulations adopted should be based on empirical evidence and not hearsay put forth by a group or groups with obvious selfish interests.

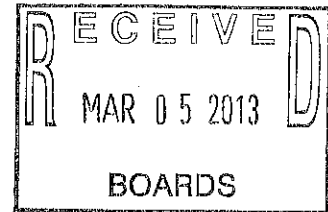


C. Allen Pool  
Cc: Board of Fish Chairman Karl Johnstone

FROM THE DESK OF

*Arthur W. Alger*

3/14/2012



Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001  
**Tsiu River:**

My wife and I have been going to the Tsiu each year for the past 14 years for fishing and friendship. We enjoy the area and love seeing how it changes each year dependent on weather and tides.

We enjoy the abundance of wildlife – Bears, seals, eagles, trumpet swans, etc, and enjoy seeing them in their native environment.

In recent years – we have seen a marked increase in the amount of aggressive power boating on the river. Aside from being noisy and disturbing the natural tranquility of the region, it is more than dangerous to have them on the river at the same time there are fisherman.

We have never had the pleasure of seeing a game warden in the area. And due to the remoteness of the area – and the close community atmosphere – I imagine that "surprise" visits are hard to perform since the only way in and out is via air and radio waves travel faster than planes so poor behavior can be curtailed before the inspector arrives

We spend an average of \$20,000 per trip on airfare, lodging, and meals on our annual trip, and would hate to see the area destroyed by overfishing, noise pollution, and people acting badly.

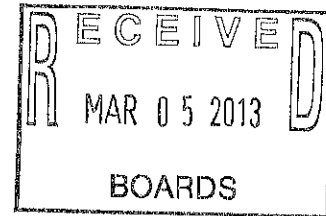
We respectfully request that you reconsider the decision to limit the amount of commercial harvesting on such a valuable and remarkable recreational site.

Sincerely

Art & Donna Alger  
San Jose, CA  
Cc: Board of Fish Chairman Karl Johnstone

March 16, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

I am a sport fisherman that comes to Alaska every fall with my son, and two other friends. We have done this for the past twelve years. This last fall was our third trip to the Tsiu River. The first year we had two days with no commercial fisherman on the river and had a great time and caught lots of fish. On the day the commercial guys showed up it all changed. With no words exchanged they started dragging a net across the area we were fishing in. All we ask is that a little common courtesy be displayed. After that we had two fish on when they started the herding of fish into the net. It really did take away from the Alaska experience.

We have kept coming back thinking that something will change. Last year it did, we saw salmon that were off color pitched over the net we saw a full bin that was left on the bank overnight. The good news was some of the commercial guys in boats would slow down when they went over our lines.

In my opinion to keep this fishery alive and well for the sportsman there has to be some middle ground. I'm convinced that Alaska does not want to lose the dollars that sportsman bring into the state every year. To use vacation time to fish a river like the Tsiu is a dream come true to most sport fishermen. But on days when commercial fishermen are on the river it can easily turn into a nightmare.

Don't ruin something that can be so good for so many.

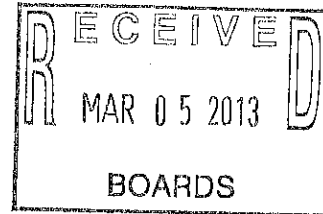
Sincerely,

Art Morrison  
9321 22<sup>nd</sup> St E  
Edgewood, WA 98371

CC: Board of Fish Chairman Karl Johnstone

March 12, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I am a retired Nuclear Chemist and have fished on the Tsiu River since 1990. When I first fished the river it was not highly populated with fishermen or commercial fishing operations. One would not see many other fishermen during a day's fishing. As the years went by the river became more popular with both the sport fishing crowd as well as the commercial fishermen. There started to be conflict between the two groups. In recent years this conflict has become worse.

On two occasions I can remember a commercial fishing boat came roaring by me, while I was wading in the river, almost knocking me down. It has been my observation that in general the sport fishermen try to avoid the commercial areas, but the commercial fishermen pretty much do as they please. I have also seen a lot of waste from the commercial operation. Up river one runs into injured dying fish, victims of the nets used by the commercial fishermen. The group I fish with uses only flies with barbless hooks and we return most of the fish we catch to the river.

Several times I been told the issue of conflict had been addressed, but nothing seems to change. This year I noted the Board of Fish voted for proposal 301, a step in the right direction. Then I heard that one board member was changing his vote. I could not believe you could come back a day or so later and change your vote. It all smacks of politics Instead of looking at the facts and making an intelligent decision.

Lastly I have to make a decision of my own whether I will be back to the Tsiu. The trips to the Tsiu are something I dearly love but are not cheap. Those trips must provide a good experience or my participation will have to go elsewhere. Counting airfare to and from Alaska, lodging in Cordova, meals and fishing days at the lodge on the Tsiu I spend approximately \$4000 in Alaska each year.

I would urge the Board of Fish to get this problem resolved with some enforceable regulations.

Austin L. Prindle

2546 Lariat Lane  
Walnut Creek, CA 94596  
[amprindle@astound.net](mailto:amprindle@astound.net)  
925-934-6584

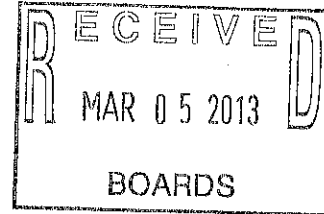
Cc: Board of Fish Chairman Karl Johnstone



March 16, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

RE: Tsiu River  
Proposals 301, 302, 303



Hello,

My name is Betty Castronuovo and I have been coming to The Tsiu River for about 8 or 9 years. I have spent tens of thousands of dollars to fish in the Tsiu River for a week's vacation only to find commercial fishing boats scooping up all the salmon so there is none for us to catch. This is not fair and right.

1. These guys on these boats that come into the river are loud, crude and rude scaring all of us and the fish too.
2. I have never seen this so called person that lives on the river and is an employee of the fish and game dept.-I think this is a misunderstanding. In my opinion there is no person.
3. These commercial fishing companies need to go somewhere else to catch their fish. There are a lot of us anglers paying big bucks for a nice fishing vacation and to encounter this problem is totally unfair, Also, this is not right for the camps and lodges on the Tsiu River that are hosting us and trying to please us.

Something needs to be done, hear us out.

Thank You,

Betty Castronuovo  
Villa Park, Calif.

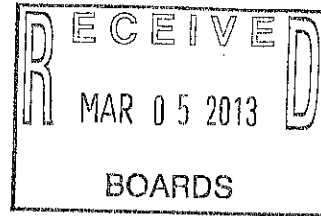
Cc: Board of Fish Chairman Karl Johnstone





March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have fished Alaska's Tsiu River annually for the past seven years, and thus followed the meetings you recently concluded on SE Alaska and Yakutat area fishing issues, paying particular attention to Proposals #301 & #302.

Proposal #301, as amended and initially passed, was a good compromise, but (in the end) lobbying pressures likely reversed and defeated a sound, and much needed, policy for the benefit of sport & commercial fishing interests. In my opinion, the board had an opportunity to mitigate a serious conflict between the two groups, but failed to do so.

I personally have experienced nets anchored at my feet in water I was fishing, with the explanation: "we have to make a living too". In addition, I have had to leave the river, for my safety, because of a power boats running across my line while herding fish into set nets, when I occupied the area prior to their arrival.

I understand that Proposal #302 (herding fish on the upper half of the river) was defeated with evidence that the on site F&G employee had not submitted a single complaint, or witnessed a single illegal activity in her three years on the river. I have yet to see, meet or have an F&G employee pointed out to meet in the 28 days I have fished the Tsiu over that past 7 years. I find this testimony "laughable"!

Current commercial harvest methods on this small river will continue to be in conflict with sport fishing, unless separated. This is NOT the experience I come to Alaska for. I would like to believe that the \$4,000+/year I spend on lodging, air and license fees to fish in Alaska (and many others like me) is considered by the board when reviewing decisions concerning sport fishing interests. I'm not convinced the playing field is even on the Tsiu.

Thank you for your consideration.

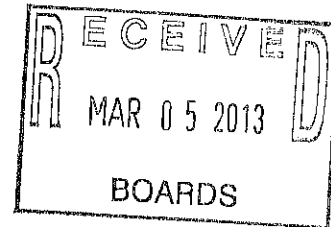
W. R. Meier  
3265 Balsam Dr., S  
Salem, OR 97302.

Cc: Board of Fish Chairman Karl Johnstone



March 9, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**Board chairman:**

**RE: Tsiu River**

My husband and I have been following closely the progress of Proposals 301, 302 and 303 as presented to the "Alaska Board of Fisheries". It is with immense disappointment that we read the outcome in the Ketchikan Daily News. Due to the action taken on Proposal 301 the issues presented in both 302 and 303 were not addressed. Proposal 301, as amended was a good compromise which would have minimized friction between the different interests. It is unfortunate that politics have trumped good management.

We have fished the Tsiu for the past 14 years. Although the costs involved to fish this river exceed \$7,500, including air fare, per person depending on how long we stay in Cordova and Anchorage, we feel that is a unique experience. Throughout those 14 years we have had to contend with the blatant disregard for the river, the salmon and our presence on the river exhibited by the commercial fishermen. We have witnessed the outright waste of the resources by the commercial fishermen. I have photographic support of abandoned nets containing dozens of dead fish. On one occasion a trailer full of salmon was abandoned on the beach, it sat in the sun for two days before it was removed in the dead of night.

At various times we have been intimidated by power boats running over our lines as well as driving straight for us and turning at the last moment. The commercial fishermen are not only verbally abusive but at times display pistols and shotguns in an intimidating and frightening manner. Obviously the salmon run on the Tsiu is a healthy one with many fish, apparently the commercial fisherman feel they have the right to all of them.

We have never, in all the years we have been fishing the Tsiu seen any sign of a fish and game officer. In past years we have made our concerns known to the operator of the lodge. We would have reported the aggressive activities and wanton waste of fish had there been anyone of authority on the river.

It has always been our belief that there are enough fish for both the commercial fisherman and the sports fisherman and women. Indeed we support the State of Alaska and the fish and game department with our fees as well as the hotels and restaurants we patronize. This is not to say ALL commercial fishermen are intent on harassing the sport fishermen. In recent years there have been a few courteous commercial fishermen, but they have been in the minority.

We cannot express the disappointment we feel at the total lack of support your decision on proposal 301 represents. The actions of the commercial fisherman on the Tsiu river in regards to the sports fishermen is an outrage, they are aggressive, personally threatening and are an incredibly poor reflection on the State of Alaska and the Board of fisheries. It is apparent that the sport fishermen are not only unwelcome on the Tsiu but personally at risk of life and limb.

Sincerely,

Bob and Susan Mueller  
438 Socorro Ct.

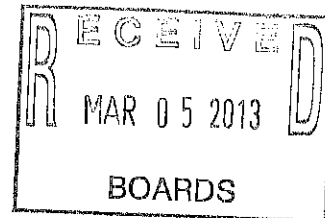
Reno, NV 89511

Cc: Board of Fish Chairman Karl Johnstone



March 13, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

It has been my pleasure to have fly fished on the Tsiu River several times. It is one of the most amazing Silver Salmon fisheries I have ever visited. Unfortunately I have experienced several close encounters with the commercial fishermen where they have driven their power boat up the river channel in which I was fishing at a distance of less than 20 feet away. Not only did the wake from the boat almost come over my waders but the pod of fish in front of me was spooked up river. Not sure if herding the fish was his intent but it was certainly an offsetting experience. I asked my guide if this was a normal commercial fishing activity and his response was; to his knowledge there was no oversight by the fishery management personnel to prevent these type of occurrences. I know in the 10 plus days I have spent on the Tsiu River I have never seen any fishery management enforcement personnel.

In my opinion management of the Tsiu River as a sport fishery should be very important to the responsible officials. Commercial fishing and/or lack of oversight of their activities could certainly have a negative influence. The amount of money brought into the Cordova area as a result of this fishery must be very beneficial. During the times I was there with two other friends we spent in excess of \$30,000. When this dollar amount is spread over the number of sport fishing people and the length of the season the result is a significant cash inflow into the local areas. It would be a shame to let commercial fishing or lack of control of commercial fishing negatively impact what the sport fishing population is contributing.

Bob Robinson  
10226 E. Spring Creek Rd  
Sun Lakes, AZ 85248

Cc: Board of Fish Chairman Karl Johnstone



March 9, 2012  
Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have fished the last five years as a guest at Alaska Wilderness Outfitters on the Tsiu River during the latter part of September each of those years. During this time, I have observed the commercial fishermen and their operations which took place along the same stretch of the lower river that we fish.

Since the Tsiu River is such a short river, the fish tend to turn "color" rather rapidly and as a result, we concentrate our fishing on the lower sections, wishing to keep only bright, firm salmon. In the approximate 25 days of my fishing on the river, I have never encountered an Alaskan Fish and Wildlife employee nor have I ever seen a woman on the river other than employees or guests of Alaska Wilderness Outfitters.

I have seen first-hand the herding of fish by the commercial fishermen numerous times. Just this past year, one of our fishing buddies was standing upon a small sand spit in the middle of the river and a boat pulled up just beside him and started putting out his nets. They then started to herd the fish towards the nets. Another year, four of us were fishing next to each other and three commercial fishermen came wading down the river with long poles, splashing the water to herd the fish into their nets. They waded close enough to us that we could hit them in the head with a fly cast. One of our party yelled at the guys and one of them replied, saying something about "they had to make a living". We quit the area in disgust.

Several other times during these years, I have seen them set out their nets in our vicinity and then start to herd the fish with their outboard motor boats by zooming around and around the river driving the fish to their nets. So much for the serenity of fishing in an Alaska wilderness area! We often abandon the area we have been fishing but then have to go up river to find a spot where the fish are less abundant and have started to turn color.

I've seen Dan Earnhart take photos of some of these actions. I would trust his photos more than the observations of a "phantom" full time employee. When does she go out to observe? Is it after dark? It's a fairly small area and we are usually on the river from 8:00am til about 5:00pm.

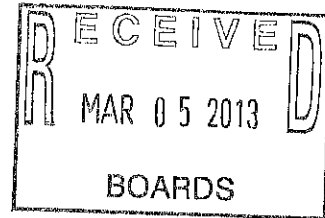
Sincerely,

Bruce L Wulf  
656 Lamplighter Circle SE  
Salem, Oregon 97302

Cc: Board of Fish Chairman Karl Johnstone

March 9, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have fished the Tsiu River for at least 10 years. I used to fish the Lost River out of Yakutat but because of the commercial net practices there, the area became nothing more than a zoo and a lousy wilderness experience.

I spend on average \$3200.00 on lodging and airfare to fish for about 3 days on the Tsiu, including \$50.00 for a 10 day visitor license

I have seen the fish herding and fish waste on the banks by the commercials. This occurs generally right in front of a group of sports fishermen. Last year, the commercials drove their power boat right in the middle of a stretch where a group of flyfishers had been casting. Then they placed their nets within a few yards of the sports fishermen, anchored them to the bottom and then they left. Where was the Fish and Game person then with her badge ?

I have never in all the years I fished the Tsiu, ever seen any fish and game person, badged or otherwise on the river. I have fished both sides and walked far up the river. I was checked on the Lost river however on several occasions. I challenge you to find in your records one instance where a badged person made a report of checking a license of a sports fisherman on the Tsiu.

Why should I come back to the Tsiu to have a good fishing experience, when nothing is being done about the commercials ?

As an attorney, it upsets me to learn that recent board action in reversing the vote on Prop 301 was based on backdoor, after the fact, information. What ever happened to the constitutional right to Notice and Hearing ?

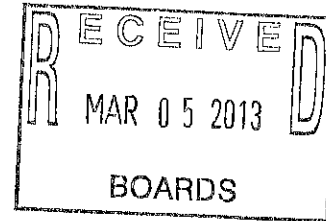
Chap Milbank  
1285 Marshall Drive SE  
Salem, OR, USA

Cc: Board of Fish Chairman Karl Johnstone



March 9, 2011

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have been to the Cordova and Tsiu River area three (3) times since 1998. I have fished the Tsiu twice since 1998. There was definitely a conflict between the boats and the wade fishermen on my first trip and the following trip. The boat operators would come right at me and other wade fishermen and totally disrupt fly fishing on this beautiful river. They did this to the point of endangering those of us wade fishing! We did not go to the Tsiu in 2011 because of the commercial fishing/ boat issue. My sons wanted no part of the conflict with the boats!

I have witnessed the dead fish in the river and on the land from the commercial fishermen. The only time I have ever seen a Fish and Game employee was my first trip in 1998. He did check my license and was with me watching the dead fish float by. He explained that the locals were legal in taking fish at that time from the Tsiu. This trip was in mid-September, 1998. My brother-in-law and I spent six weeks in Alaska on this trip after I retired.

On my first Tsiu week trip in 1998 I spent around \$6000 and on the trip in 2011 around \$4000. In mid-September, 2008 I brought my two grown sons at my expense for a week of fishing the Tsiu and spent over \$15,000 on this outing. I have been to Alaska on three other trips in the last 15 years.

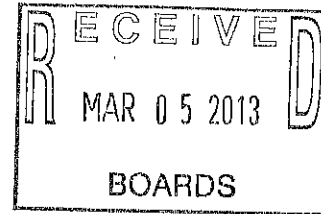
I enjoy the beauty and the great salmon fly fishing on the Tsiu. My wife and I are discussing another trip to Alaska.

Charles McConnell  
449 Meadow View Parkway  
Erie, CO 80516  
303-604-2253

Cc: Board of Fish Chairman Karl Johnstone



March 11, 2012  
Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

I am from Portland, Oregon, and have fly fished the Tsiu, for five days, a few years back. It was a great experience, although our success was limited on the days the nets were in. I am sure the commercial coho catch from the Tsiu is a minuscule component of the fish landed in the Yakutat to Cordova region. This tiny river system is a superb sport fishery due to the water clarity.

Since the sport fishery has a much greater economic impact on your region you should give that fishery priority. The unrestricted commercial use of the river will eventually ruin the experience, and kill the sport operations, if not the run itself.

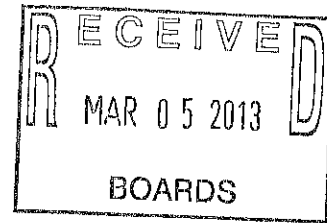
It may be hard to live in Alaska, and imagine rivers empty of salmon, but there once were thriving commercial salmon fisheries in New England, California, Oregon and Washington, that are now as extinct or remnant as the fish themselves. Institute the new proposals to allow sport and commercial interests to share the river, or risk the loss of both over time.

Sincerely yours,  
Clifford S Canepa MD  
10426 NW Arcadian Lane.  
Portland, OR

Cc: Board of Fish Chairman Karl Johnstone

March 13, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**Tsiu River:**

My name is Dan Ernhart. Executive Director of the Tsiu River Coalition. The author of proposals 301, 302 and 303. I also run a lodge and have guided on the Tsiu River for the past 17 years. I am writing to express my views on what happened with these proposals at the Ketchikan Board of Fish meeting.

I was at the meeting for almost every minute of each day. Plus before and after hours. I spent the last 5 years collecting video, data and comments to support these long thought out and well written proposals. I am sure that is why the board voted in favor of the first proposal to come in front of them. It made sense and there was not much public opposition. The opposition had 10 months to gather support and get their own case together.

Only after the vote did a few select people get upset. So upset that the facts started to get a little blurred. I find it interesting that a couple of late night phone calls to a Board member and a few sheets of paper that came in 36 hrs after the vote, that really didn't prove or have much new information, could turn over a decision that was based on 40 pages of Public Comment including 50 complaint letters that spanned 5 years!

The saddest part is that proposal 301 was designed to help all the users of the resource. The resource area has changed dramatically over the last 20 years, the users, landscape and the river itself. The regulations and management need to be updated to change with the times.

I am all for this Board of Fish Public process. I have seen it work. Most of the Board members were very nice to me and actually listened to what I had to say. I was impressed that most did not come to the meeting with preconceived views. But rather wanted to listen and get to know the subjects at hand. And then vote on what was right, not always what was popular. But unfortunately I believe there was a breakdown in the process. When Board members came up to me after the vote reversal and apologize I had to wonder if they felt bad for me or if they were somehow trying to make what happened right to themselves.

Thank you for taking the time to review my comments. Thank you for taking the time to review my comments. My intention has and always will be for a solution to keep the river safe for all users and for everyone to enjoy the Tsiu river experience.

Dan Ernhart

Tsiu River Coalition  
PO Box 1403  
Cordova, AK 99574  
218-252-2337

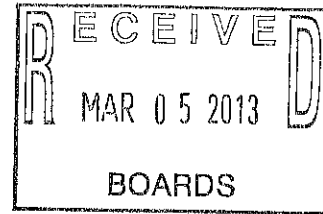
Cc: Board of Fish Chairman Karl Johnstone





March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tslu River

This note pertains to my experiences fishing on the Tsiu river in alaska. I have taken two trips there to fish silver salmon. I must say that the last trip was a real eye opener. I was shocked to see how us sports fishermen were treated by the commercial fishing people also using the river. On one occasion I had to rapidly reel in my fly line or have it cut off by a boat speeding up the river to announce their start of the netting process. On another ,boats would speed up to my fishing location and rapidly turn causing a large wake-an attempt to get me out of there. I also saw nets placed all the way across the river to capture incoming salmon, effectively cutting off any fish that I might have a chance to catch with my fly rod.

At no time in any of my 8 days on that river have I ever seen an official from Fish and Game monitoring either people fishing or netting.

These salmon fishing trips my partner and I take are not cheap. Outfitter plus airfare to cordova runs us 4000+ and then there is the price of hotels and meals before we get to the river.

I am not interested in fishing the alaska rivers and being harassed by commercial fishers who want to "bully" the people on shore who are trying to catch a fish with rod and reel.Can something be done about this? I await your reply and hope you can make a decision that is not politically motivated.

Sincerely,

David Groppoli

St Paul ,Minnesota

Cc: Board of Fish Chairman Karl Johnstone





March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have fished the Tsiu river three times. Every time was a wonderful fishing experience other than the constant presence and detracton of the commercial fish boats, planes and people. These factors seriously detracted from my experience on the Tsiu. The noise ,sight and presence of these commercial operations made the experience more of an exercise of patience and tolerance rather than the "wilderness experience" I had planned to have.

The Tsiu is a beautiful river in a glorious place. The commercial fishing operation is a huge distraction to anyone trying to experience a wilderness fishing trip and pristine environment. I have not been back to the Tsiu for many years. The only reason for this is that I do not want nets, nolsy boats and a lot of commercial fisherman ruining my fishing trip. A trip to the Tsiu a very enjoyable experience, if it were not for the constant distractions caused by the commercial fishing operation.

I have never seen or talked to or seen a game and fish department employee on the Tsiu. If the department would monitor the sporty fishermen on the Tsiu, they would quickly determine that the sport fishermen do not want the commercial operation there and that it seriously detracts from their enjoyment and desire to return for a very expensive trip that falls short of their desire for a true" Alaska Wilderness Experience."

Please curtail or stop the commercial fishing operation on the Tsiu, so that sport fishermen can fully enjoy the Tsiu.

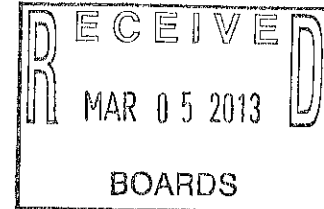
Sincerely Yours, David Pipkin, 310 NE 4 th st. Cedaredge, Co. 81413

Cc: Board of Fish Chairman Karl Johnstone



March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

Having fly fished the Tsiu four times over the past twenty years, I was greatly disappointed on my last trip to the river two summers ago. The commercial fishermen were laying their nets right up to the shore not twenty feet from where we were fishing. They then herded the salmon to the nets and harvested the catch, except for a few salmon strewn along the banks. Not only did all the noise and activity completely ruin the delight of being in Alaska and the enjoyment of fishing such a beautiful river, but it also put me in doubt as to why I was spending so much money for such an unnatural and unfriendly experience.

I have fished for two week periods in many places in Alaska both alone, with my wife and at least twelve times with five friends from the San Diego area. Unless there is a meaningful change in the commercial/sports fishing regulations for the Tsiu we will not be returning to this river.

I will also pass this message on to my fellow members (250) of the San Diego Fly Fishers.

With hope of a return to the Tsiu,

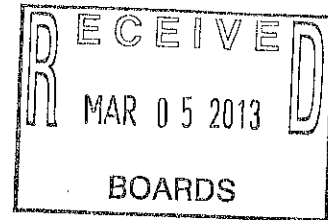
Donald Schoell

Rancho Santa Fe, California

Cc: Board of Fish Chairman Karl Johnstone

March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

I have been following the progress of the talks for new regulations on the Tsiu. The board's recall action smells of back room bargaining that these public discussions were designed to eliminate. Too bad that these folks can get away with underhanded law making and think no one notices. The bad part is that they used the excuse of finding new information (all one sided) as the reason for changing their decision. What happened to checking facts and taking testimony from both sides? If due process had occurred, big holes would have been seen in the "new facts" and new vote would have been seen as obvious collusion.

From my position as a sport fisherman who has enjoyed the Tsiu for more that 20 years:

1. There is conflict between the sport and commercial anglers. I have personally been run of the river by power boats herding fish into the nets. I have several times had to move as nets an boats and workers positioned their equipment. Funny how the fees I pay to lodges and the fact that I had been fishing a spot for a few hours are completely ignored and no one comes to my aid. Except Dan Earnhart. Through his actions the commercial fisherman are now more polite when they run you out of your fishing spot.
  2. The City of Yakutat should loose their right to lodge fees every time the commercial fishermen put in and spoil the sport activity!
  3. In 20 years I have seen F&G folks only twice. Not at all in the past 5 or so years. Of course I'm only there for a week at a time. I do see commercial fishermen every time.
  4. Weather controlling, tote bins of fish are left to sit for what seems like days. I certainly would not buy them.
  5. What happened to Proposals 301, 302, 303 ? All should get a hearing.
  6. The conflict resolution team did not do their job. Why were they called to study a situation and suggest solutions if there was no conflict?
  7. This long standing problem needs an agreed solution. This is a 4 mile long river and the same fish swim the entire length. If sport anglers are willing to give up prime location at the mouth to get agreement why not move to find a way to work together. Yakutat gets paid to do this and should get it done.
  8. Sport fees are substantial. In addition to the excellent experience afforded to us by the lodge, the Alaska experience is suffering because of mismanagement of this river.
- Please do your best to set this right. We have a small river is a large wilderness with substantial improvements investment. We should ALL be able to use it to our best advantage.

Thank You,

Ed Rabinowe

Big Meadow Farm

34201 Big Meadow Lane

Deer Island, OR 97054

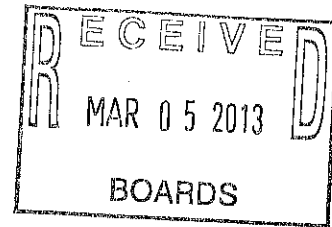
cell 503-860-0970 home 503-366-3565

Cc: Board of Fish Chairman Karl Johnstone



March 14, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

This letter is in support of proposals 301, 302, and 303 to change the commercial harvest of silver salmon within the Tsiu River system and to increase the numbers of silver salmon available to the sport fishery.

I have sport fished the Tsiu River approximately 35 days over 5 years since 2003 and have witnessed conflicts between sport and commercial fisherman. This has included physical displacement of sport fisherman by commercial fisherman, herding salmon into commercial nets, and removal of salmon from sites being fished by sport fishermen. While I have no specific data, I am sure the monetary value of each salmon in the Tsiu River is far greater to the sport fishery than it is as a harvested commercial fish. This is partly due to the fact that most sport caught fish are released to either be recaptured as sport caught fish or allowed to escape and spawn. Personally, my sport catch has resulted in about 10 salmon released fish for each one kept.

Both the area and days of the week available to commercial salmon fishing should be reduced. I urge the adoption of proposals 301, 302, and 303 to reduce these conflicts. Proposal 301 will close the upper half of the river to commercial harvest. Proposal 302 will prohibit herding of fish into nets with power boats. Proposal 303 will allow a minimum number of silver salmon to escape to spawn before the commercial season is open. The days when no commercial harvest is allowed should be a minimum of two per week. Each of these is reasonable, appropriate and easily enforceable.

Thank you for consideration of these requests.

Sincerely,

Frank Hall  
697-940 Gold Run Road  
Susanville, California 96130  
530-257-2957  
[fgahall@frontiernet.net](mailto:fgahall@frontiernet.net)

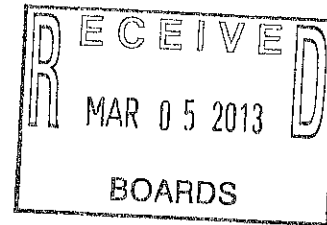
Cc: Board of Fish Chairman Karl Johnstone



March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

RE: Tsiu River



I would like to express my concerns to your recent decisions regarding Proposal 301 and 302.

I have been coming to Cordova and fishing the Tsiu River for 8 years spending a large sum of money in Cordova and Tsiu River Lodging and taxes, and usually spend a week in Anchorage for shopping and sightseeing .

My wife and I like to bring our children and grandkids but over the past years the tension between Commercial and Sport Fisherman on the Tsiu has increased to the point of being uncomfortable. In my 8 years of fishing the river I have never been checked for a License or seen a representative from the Alaska Fish and Game. Last year seemed to have the most commercial presence with some inexperienced commercial fisherman showing disregard for the Tsiu, the wildlife and the outdoors.

I realize that many of the commercial fishermen are just trying to make a living so hopefully we can find some common ground.

Thank you for taking time to read this letter and see the sports fisherman's side and understand they create a lot of Jobs and revenue for The Tsiu River and the wonderful state of Alaska.

Sincerely,

Gary Zornes  
2110 Strada Mia Ct  
Las Vegas, NV 89117

Cc: Board of Fish Chairman Karl Johnstone



3/11/2012



Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

RE: Tsiu River

I have fished the Tsiu River for silver salmon four times since 2000. Notably, in 2010, relations with the commercial fishermen were relatively pleasant. In years past though it has been a different story. The commercial boats have been run close to us while we've been in the river and essentially unable to avoid them. In one instance a boat ran between me and my father, while we were but 15' apart, standing in the river fishing. I was afraid that my father was going to be run over! The river was large that year and there were many places the boat could have gone, but the operator chose to run right between the fishermen. Those of us who are wading are at a huge disadvantage in such a conflict. Wading anglers can only move slowly and cautiously, while the big metal power boats roar by, at dangerously close range.

This is a very special fishery, with an amazing return of silver salmon. Waste of the resource is terrible, yet I've seen a cart full of fish left abandoned on the sandy banks above the Tsiu. I have also seen an apparently abandoned net, with several dead salmon tangled in it.

Never have I seen a Fish and Game official on the river, checking anything. This surprises me, with so many commercial and recreational anglers using the river. In contrast, here in Washington State, I've been checked several times while fishing for steelhead and salmon.

It's an expensive proposition to fish the Tsiu for a few days. Round trip air fare to Cordova, then the flight to the lodge near the Tsiu in addition to the expense of staying in both Cordova and at the lodge itself. Deconfliction between the recreational anglers and the commercial fishermen would enhance the value of the fishery to me.

I thought that this conflict had been resolved when the board voted for Proposal 301, but have learned that it is still ongoing. It needs to be settled.

Respectfully,

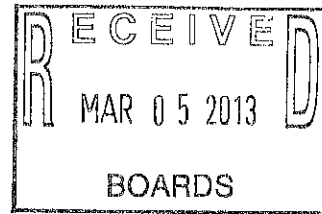
Guy Miner  
1609 Russell Street  
Wenatchee, Washington 98801

Cc: Board of Fish Chairman Karl Johnstone



March 15, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

Ladies & Gentlemen,

I was very disturbed to read a recent article in the Ketchikan newspaper regarding the reversal of a controversial board decision aimed at reducing sport-commercial conflicts on the remote Tsiu River near Yakutat. It appears to me that amended Proposal 30L, to close a portion of the river to commercial fishing to provide a sport-only zone, was a very reasonable and equitable solution.

When I originally learned of its 4-3 approval I was ecstatic. However, when I later learned that the Board of Fisheries had apparently later caved to commercial fishing interest pressure (disguised a new information but really wasn't) and reconsidered the proposal, subsequently voting 3-4 to overturn the original approval of amended Proposal 301, I was stunned. I thought that this type of exercise of raw political pressure was reserved to the lower 48 states and specifically to Chicago. To say that I'm disappointed would be a gross understatement.

I am from California I look forward to at least one or two annual trips to Alaska to fish, with my favorite destination being the Tsiu River. I typically spend around 55,000 on each of these trips and my half dozen fishing buddies do the same. I know that we're just the tip of the iceberg and if you extend that type sport fishing expenditure to multiple fishing lodges on the Tsiu River for an entire season, you're looking at several million dollars per year. It seems to me that sport fishing's economic contribution to the Tsiu River fishery shouldn't be trumped by commercial fishing. Sport fishermen don't appreciate being harassed by commercial harvesters, as they heard salmon into nets using boats. Let the commercial harvesters have their section of the river and let sport fishermen have theirs. That's the equitable solution and that's what amended Proposal 301 is all about.

In conclusion, I urge you to reconsider your actions and to approve amended Proposal 301.

Jim Conrad  
3723 Brand Crest  
Encinitas, CA 92024-5505

Cc: Board of Fish Chairman Karl Johnstone





Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

**RE: Tsiu River**

Portland, Oregon 3/13/12

I decided to discontinue fishing the Tsiu River a couple of years ago after several enjoyable trips. My plan had been to pass on the wonderful experience to my sons/grandsons over the next few years and hope that fishery continued on for many more years.

The flights to/from Anchorage, Cordova, and out to the Lodge were always a highlight of the late summer/early fall season. Extraordinary became ordinary while I enjoyed Alaskan morning light on the Tsiu and sunsets from the deck of the lodge. The fishing was always good until the jets hit the river!

Putting up with risky boat operators isn't anything new to me, and this group was as wild as I've witnessed. I'm not a kid anymore and one of them almost picked me off one day while I scrambled away from an approaching high speed jet boat that was attempting to herd some fish into a net. The catch was primary and I was secondary in importance that day. One of my fishing acquaintances decided to hold his ground in the river and came within a hairbreadth of going home in a box! In my estimation the boat was aimed at him. Here in Oregon we arrest people for operating boats recklessly and some of the boat operators I watched should have been arrested for endangerment and reckless boat operating. I'm surprised that we've never seen any enforcement people on the river in my years of fishing?

Joint utilization of an asset like the Tsiu Fishery is always going to be a problem due to its size. It's a pretty short river with a lot of fish moving in over a short time span. Mixing two competing uses like commercial vs. sport fisheries, in a small space and a short period of time, is a recipe for problems without strict supervision and/or division of competing uses. It's worked fairly well along the Columbia River even though no-one ever gets exactly what they consider their share.

Someone asked me what it costs to make Alaska trips and how I liked them overall and my response has been/was always short and sweet. " Start North with a few thousand dollars in your pocket and you'll have the greatest time of your life, and if you're lucky, you'll bring home the most expensive fish you'll ever eat"! My first trip to Alaska was in 1972 and I've never stopped coming back. I've fished, hunted, and been a sightseer all these years. I've kept my own fishing boat on Price of Whales, bare boat chartered from Juneau, been to the Bering Sea, hunted the Peninsula, hunted the interior, sold boats to Alaskans, and been on floats all over the State. Alaska has always been like a second home to me and I have a lot of friends that live in Alaska. The Tsiu was going to be my last stop after a lifetime of enjoyment in your State.

My opinion is that you should reconsider the alternatives presented vs. status quo, and attempt to either separate competing uses, or, implement a stricter control system to prevent the kind of thing that sent me packing.

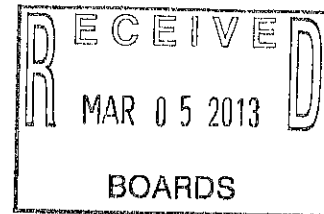
Sincerely,

James C. Irwin  
Irwin Yacht Sales  
11050 S.W. Lynnvale Dr.  
Portland, Oregon 97225  
Cc: Board of Fish Chairman Karl Johnstone



March 9, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

Out of the past 12 years I have fished the Tsiu River 11 times along with my son 4 times and a grandson 1 time. This is a total of 16 times we have fished the Tsiu at the cost of approximately \$5,000.00 per trip for each person. This includes air fare, lodging and meals in Cordova, the fee for lodging, meals and fishing on the Tsiu. The total I have spent for fishing the Tsiu including my son and grandson is approximately \$80,000.00. To me this is a large amount of money for recreation.

For this money I expect to have a good time fishing on the Tsiu. Unfortunately when the commercial fishermen are on the river it is not fun but rather a game of not being subject to harassment.

Over the years the harassment from the commercial fishermen has been from slight to extreme including :

Running their boats at high speed between my son and I when we were less than 15 feet apart.

Placing a net between another fisherman and I when we were 10 feet apart.

Showing their middle finger at us while running the boat next to us while I am in 3 feet of water. The wake almost knocked me over.

When the commercial's are on the river, we are constantly molested except for the year 2010 the last time I fished the Tsiu. That year the commercials were courteous to the point where I had conversations with them on a friendly basis. There was still harassment from the speeding boats close to the recreational fishermen. It was also the year that a trailer (photos enclosed) of salmon was left overnight until about noon the next day. The person who retrieved them tells me that the stinking fly covered salmon would be cleaned in the cannery and processed. It according to him no problem. To me it was a quality question on how many rotten fish are processed.

In my opinion there should be a fishery law person on and about the river to enforce the fishing rules and regulations both for the recreational and commercial fishers. In all the trips to the Tsiu I have never seen such a person.

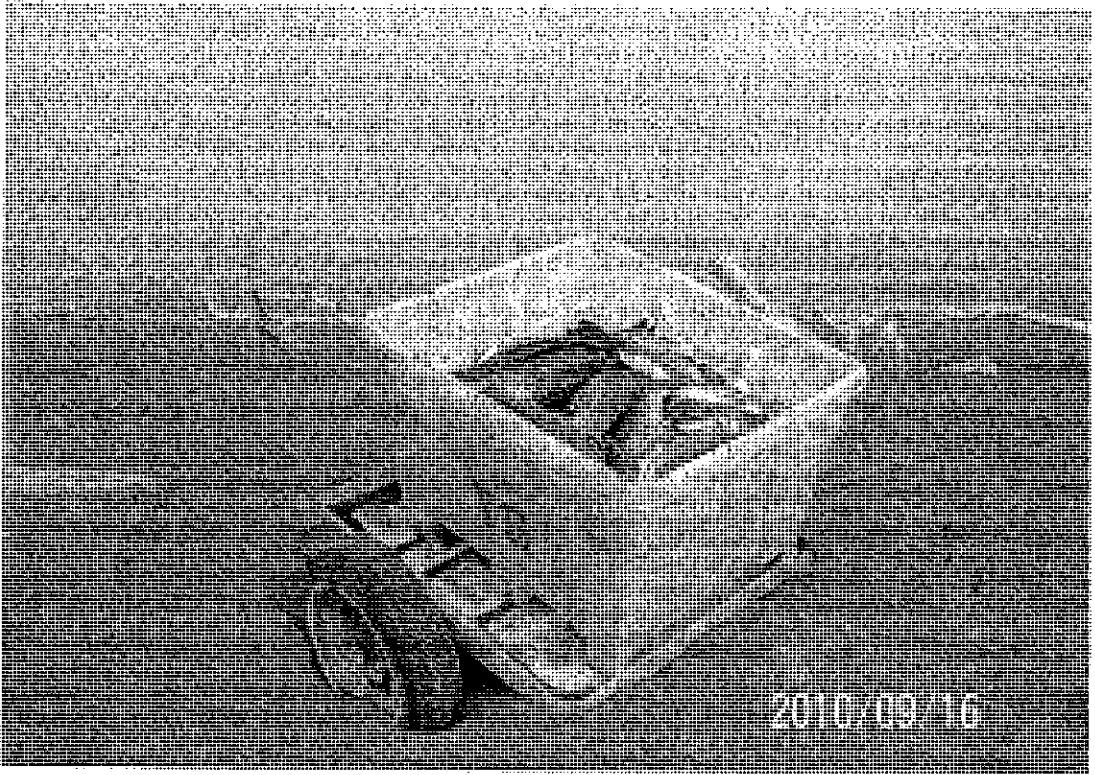
Yours truly

Jim Miner  
2871 Tim OShanter Drive  
El Dorado Hills, CA 95762

Cc: Board of Fish Chairman Karl Johnstone



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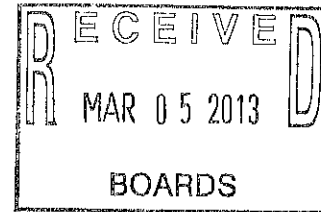


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March 13, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

Thanks for keeping me informed on the hearings regarding the Tsiu river. Needless to say I am very disappointed about the results. The commissioners have apparently disregarded the concerns of the sport fishery component regarding the river.

As you know, I have, along with a number of my friends, been coming to the Tsiu for about 10 years. From the beginning We have been concerned with our interaction with the gill netters. In order to lessen these confrontations we have been coming later in the season. This has not helped.

Frankly, I am appalled by the apparent testimony of fish and game personnel that they have not observed confrontation between sport fishermen and the gill netters. I know that there were pictures from last year when a netter threw out his off shore anchor 6 feet from where I was wading and then forced me from the river with his boat while herding fish downstream towards his nets. Where we're the observers? Two years ago a gill netter and his partner waded through a section I was fishing pounding the water with oars trying to spook fish into his net downstream. When I confronted him his response was "f--k you! I'm just trying to make a living".

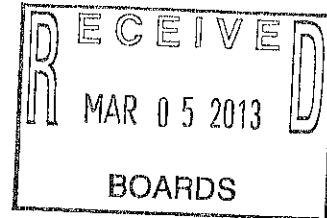
The Tsiu is a wonderful place. The fishery is unique and needs to be properly managed. I and my fishing partners have spent many thousands of dollars over the last ten years or so visiting this area. Frankly, unless something is done to regulate the abusive gill net fishery on this river We will look elsewhere. We are tired of putting up with these confrontations, I have no problem with commercial fishing per se. I do have problems with the way it is conducted on the Tsiu. Thanks Dan. Keep up your good work,

James A. Perry

3385 Country Club Dr. S.  
Salem, OR 97302  
503-930-9531  
Cc: Board of Fish Chairman Karl Johnstone

March 14, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**Tsiu River:**

I am writing this letter to address the fishing situation at the Tsiu River. I have been one of the sport fishers for seven years at the Tsiu River, which is one of the most beautiful and memorable trips I take every year. We spend seven to nine thousand dollars every year for four to six days of fishing, but it is well worth the money because of the experience of fishing there. That is not even including airfare, equipment, hotel in Cordova, etc. One of the problems that I came across is while fishing in the river was the commercial fishermen just drove close to me with his boat with no regard to my safety. He drove fast and did not care that I was standing there in the water. For me to spend that much money and to put up with the commercial fishermen takes away a lot from my trip. Also, I have never seen so many dead fish floating in the water and on the bank of the river the next day, after the commercial fishermen are there. Never once have I seen anyone regulate what is going on at the river, which I think someone should be monitoring what is happening and affecting everyone there. Please help resolve this serious problem and at least find the time to discuss Proposals 301, 302, and 303 at your next board meeting. Thank you for your time and consideration.

Sincerely

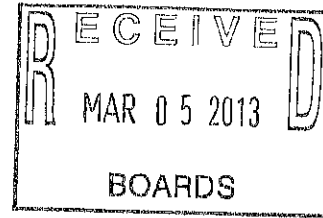
Joanne Zornes  
2110 Strada Mia Ct.  
Las Vegas, NV 89117

Cc: Board of Fish Chairman Karl Johnstone



March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have been getting updates on the hearings and was very disappointed to learn the Board had reversed it's earlier decision on the regulations for fishing the Tsiu River.

I first fished the river with two friends two years ago. We are all from the Denver, Colo. Area, and two of us have been to Alaska numerous times. We were there five days fly fishing, mostly catch and release. As you would expect, we each spent \$5-6,000 on air, meals, lodging, and guides for this trip. I was surprised to learn that there is supposed to be a resident fish warden on the river as I never saw such a person. There were plenty of salmon, but also large stretches of the river where we could not fish because commercial fisherman had set nets and were herding fish using very loud smoky boats. I thought the proposal to reserve the first 500 yds of the Tsiu for sport fishing was a reasonable one. Most of the fish caught would be returned to the water so that the commercial fisherman's upstream catch would not be significantly reduced.

I hope you will revisit the Tsiu River fishing regulation situation.

Very truly yours,

John Dunnewald, 5764 Fig Way, Arvada, Colorado

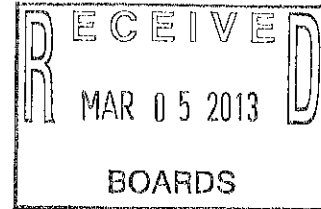
Cc: Board of Fish Chairman Karl Johnstone



March 16, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

RE: Tsiu River



It is with dismay that I have learned of the reversal of the decision to limit commercial fishing on the upper half of the Tsiu river. I have spent a great deal of money to fish the Tsiu since 1996. I have been there 6 times with the latest being 2008. At that time we witnessed what I thought were uncalled actions to harass the fish with the use of boats. This activity greatly hindered the sport fishing and has had a negative effect on all the fishermen who bring a great deal of income to the state and the Yakutat region. Also in 2008, the commercial fishermen shot and killed a sow with 2 cubs only to leave the cubs to fend for themselves and it was doubtful they would make through the 1st year.

During my 6 visits, I have never once seen the Fish and Game officer who lives in the area. I wonder how violations could be witnessed if we have never seen them.

I have been considering a return to the Tsiu this year but will wait until this matter has been resolved.

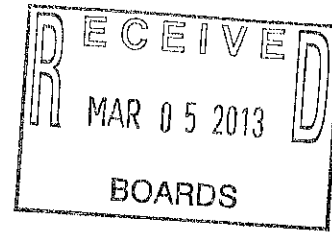
Sincerely,

Dr. John D. Smith, Jr.  
2215 Bolsover  
Houston, Texas 77005  
713-542-4085

Cc: Board of Fish Chairman Karl Johnstone

3/14/12

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



Tsiu River:

*I have been to the Tsiu river twice, once in a rough tent fish camp and once in a beautiful cabin retreat camp. Either way, I marveled at the beauty of the area, the abundance of wildlife and the wildness of the area.*

*The first time I went - was about 12 years ago and the second time was about 4 years ago. The one thing that was vivid in my mind as being different was the increase of aggressive commercial fishing on the river. I have no problem with fishing, as I like the sport and I like to take home my spoils - (Fresh salmon to share with my family and friends is a great treat). What I do disagree with is the all or nothing net fishing - and if it does not meet specs - that we just discard it on the river bank. That draws the bears into the sport fishing area which is very dangerous.*

*This last trip, we headed out early in the morning - and we were on the river before anyone else was up. We found ourselves a little hole which was producing reasonable catch and release opportunities, when we were set upon by a powerboat. This not only disturbed the tranquil environment, but I ended up taking an unwanted bath as the wake from the boat pushed me around and I lost my footing. It also scattered the fish from the area we were working, and*



*as the commercial crew set up on the river below us - no fish came up the river to where we were.*

*It is very disheartening that the commercial fishermen have such wanton attitudes toward fishing and to others on the river - I have seen the nets strung across "no more than half the river" that take up the deep side of the river where the fish travel and all that is left unnetted is the wet sand bar as the tide travels out. Like the fish are gonna travel across dry land to get up stream??*

*I respectfully request that you reconsider your position on commercial fishing on the Tsiu to after the sport fishing season. There will still be plenty of opportunity for the commercial fisherman to net the entire river then, take all that is left, without interference from the little guy and be able to leave waste behind that attracts the carnivores without danger to unsuspecting individuals.*

*Leave the wilderness and wildness to those of us that appreciate it, and travel great distances to enjoy it.*

*Truly Yours*

*Karen Alger*

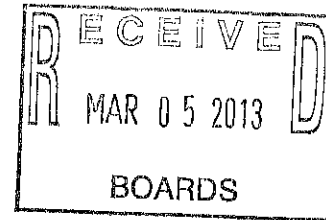
*San Jose, CA*

Cc: Board of Fish Chairman Karl Johnstone



March 14, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

As an Alaskan resident who supports commercial fishing as well as sport fishing, I am beyond belief at the lack of consideration for sport fishing on the Tsiu River. The situation is dangerous, and the waste is terrific.

As I understand it, the first Tsiu proposal was voted in and then after "new information" from Yakatat commercial fishermen, reconsidered and voted down. The other two critical proposals were not discussed, but voted down.

My husband and I have been clients at a sport fishing lodge on the Tsiu for six or seven years straight in spite of the apparently intentional near hits by commercial boats (I can personally attest to this three times), in spite watching the huge amounts of wasted fish from commercial fishermen, in spite of the unethical fish herding practices. This is because the Tsiu sport fishing for silver salmon is the best in AK, and probably the world.

We spend over \$11,000 for a week to fish. We have brought many other clients to this lodge as well, and warn them that the Tsiu is unlike any other river in Alaska--for it is bad commercial fish practices on a river and and its small size.

We were interviewed a 4-5 years ago for a report out of Juneau about the problems on the Tsiu, and that report said that there was enough fish for everyone, but that the rules for the river must change so that behavior changes. We have seen a F & G person once in eight weeks of fishing on the Tsiu over the years.

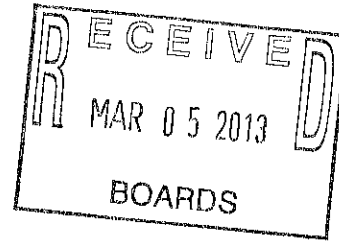
To me, the worst problems on the river are the unethical herding of fish and the rate of speed and closeness to sport fishers by the commercial fishing people. Clients get scared and put off and do not come back because of it. It would be so easy to change this by separating out the sport from commercial and outlawing the herding of fish. This would ease the tension on the river for all concerned, up the taxes for the Borough, take away the unethical practice and make this problem go away.

If something doesn't change, this problem will continue and grow and you will see the same proposals every three years. It can't continue status quo.

I urge you to reconsider your actions for the Tsiu River.

Kate Sandberg  
Girdwood, AK  
344-0116

Cc: Board of Fish Chairman Karl Johnstone



From:

Ken Malick  
Consulting Geologist  
22394 Quall Run Drive  
Parker, CO 80138

To:

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

**RE: Tslu River**

My family and I were pleased with the initial decision of the Fish Board on their decisions for the Tslu River followed by disappointment with the reversal. My family, and friends of the family have been coming up to the Tslu to fish with the Alaska Wilderness Outfitting service since they initially built the lodge. We look forward to this trip every few years when we can save enough pennies to do it. AS a family, we spend well over \$10,000/trip for the privilege of sport fishing for salmon. I would like to address a few issues which, as I understand the situation, were used to reverse the decision on Proposal 301 by a Board Member.

1. There has indeed been several encounters with the commercial salmon harvesters which included nets being stretched out where we, and other sport fishermen had been casting lures from the bank. This act was further aggravating by the boats herding the salmon into their nets while continuously running in front the bank fishermen with the noisy boats and preventing safe casts from the bank. The area of the river covered by each net was questionable in my mind.
2. If there is a Fish and Game employee patrolling the area, we never saw one at any time that we have been on the Tslu.
3. After the planes operated by the commercial fisheries finished loading and hauling off fish for the day, there were plenty of discarded fish lying around.

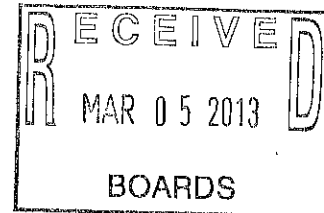
These are the main issues that seem to have been disputed, and were used to overturn the original decision. It is also my understanding that mitigation by a conflict resolution team was unsuccessful. It is hoped that a resolution of some sort can be reached. We were planning, and looking forward to a trip this year, to include my grandson. That trip is presently "on hold".

Sincerely  
Ken

Cc: Board of Fish Chairman Karl Johnstone

March 9, 2011

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I am an attorney in Minneapolis, Minnesota, 71 years of age, and I have fished in numerous rivers in Alaska over the past 35 years.

I have been fishing the Tsiu River for silver salmon (Coho) with a fly rod (mostly catch and release) since the early 1980's. Alaska Wilderness Outfitters just had a tent camp near the mouth of the River during my first couple years fishing there. I have been at the new lodge with my wife in September for the past dozen years fishing for silver salmon. The fishing has been excellent, except when the commercial fishermen are there trying to scare and run over the fishermen who are wading in the river.

I have read the newspaper accounts of the process leading up to the decision by the Alaska Board of Fish and Game to deny Proposals 301, 302 and 303. Reading over the summary of the testimony by the Yakutat fisherman and the woman who is the Fish and Game representative at the River, and the basis for the Board's decision, I must say that I do not recognize the case at all. To say there is no conflict between the commercial fisherman and the sport fisherman is totally opposite to my own experiences on the river and, I am sure, totally contrary to all the evidence you have obtained from other sources. In fact, a couple years ago, I met two State troopers coming off the plane at the lodge who were traveling incognito for purposes of responding to the many complaints lodged by fishermen regarding the dangerous activity by the commercial fishermen. They must have been there for a reason, but I have seen nothing in the newspaper report about citations they may have, or should have, issued.

These commercial fisherman go out of their way to not only show their contempt for the rest of us, they are using their boats to purposely endanger the wading fishermen by coming as close as they can in their speeding boats to the fishermen so as to inspire fright and drive the fishermen back on shore, out of danger. I have been very afraid from my wife and my own safety on many occasions. In short, somebody is going to get injured or killed by one of these boats, and then the Board will finally believe what you have been telling them.

My wife and I spend about \$10,000 every September coming to the Tsiu and staying at the Alaska Wilderness Lodge. That includes two nights at the Reluctant Fisherman Hotel in Cordova, going and coming. We have been spending one or two nights in Anchorage as well on the trip and that is extra. The Tsiu is a perfect river for wading, not too deep, and a sandy bottom with not many rocks. There is another lodge on the river as well, and the return to the lodges and thus tax revenue to the state must be substantial.

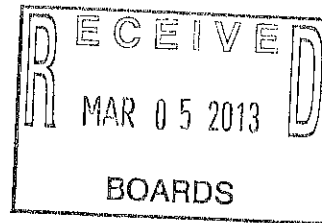
I have observed the catches the commercial fishermen make on the river, and I cannot believe it is a worthwhile activity on an economic basis considering they fly in and out to fish the river from Yakutat. The price they get for the fish is not very rewarding, so I understand. Speaking of Yakutat, in the 1970's I fished the Situk River for cohos, and I understand the fishing there is no longer the great fishing it used to be. I do not know the cause of that, but I fervently hope that the nets put across the Tsiu do not destroy the returning spawning fish stocks, so that the Tsiu will no longer be the great sport fishery I have experienced.

Very Truly your,

Leland J. Frankman  
555 Oak Ridge Place  
Unit 130 Hopkins, MN. 55305  
952 378 1132

Cc: Board of Fish Chairman Karl Johnstone

Matthew Withey  
900 N. Michigan Avenue  
Suite 1900  
Chicago, IL 60661  
(312) 915-1597



TO: Alaska Board of Fisheries  
RE: Propositions 301, 302, and 303 in favor of protecting sport-fishing on the Tsiu River

To Whom It May Concern,

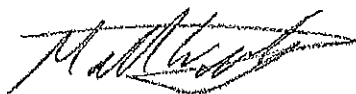
I am writing on behalf of myself, and my father Michael Withey, to voice our disappointment in the Alaska Board of Fisheries. The decision to vote against Proposition 301 was indeed disappointing, but equally disappointing was the manner in which the process was conducted and the decision reached.

I live and work in Chicago, Illinois. My father still resides where I grew up--Phoenix, Arizona. It is only once a year that my father and I are able to escape to the wilderness together to obtain our annual fly-fishing fix. The trip from the lower 48 up to the Tsiu certainly isn't easy, and it certainly isn't cheap, but is well worth it for the one-of-a-kind sport-fishing experience the Tsiu can provide. Sadly, the last time we visited the Tsiu, our experience was disappointing and heartbreaking. The complete lack of enforcement from the fish and game department (I never once saw the fish and game employee supposedly stationed on the river) has continually allowed commercial fishermen to exploit the river, destroying the sport-fishing experience. On more than one occasion during my trip, I was standing in the middle of the Tsiu, trying to enjoy the solidarity and serenity of the fly-fishing experience, only to have the deafening roar of a power boat come life just below me, and proceed to jet across the river in methodical bursts and zig zags, herding schools of fish away from the narrow open channel and into the expanse of commercial netting stretching across 75% of the river's width.

I am disappointed in the Alaska Board of Fisheries' decision to vote against Proposition 301, but I am even more disappointed to learn that the Board initially voted in favor of the proposal, and then overturned the decision after receiving un-vetted emotional complaints after-the-fact. Certain members of this coalition (namely Dan Ernhart) have spent a tremendous amount of time and effort properly navigating the legal system in an effort to protect a truly great salmon fishery. It's unfortunate to have those efforts nullified by complaints outside of the appropriate judicial setting.

I urge the Board to reconsider its decision on Proposition 301. I also urge the Board to take the time on Propositions 302 and 303 to digest all the information, and focus not on the parties' emotions, but on the facts and what is best for the Tsiu.

Sincerely,

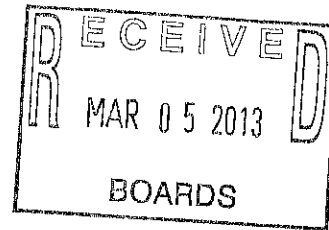


Matt Withey



March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

I have been following and listening in to the boards discussions on the Tsiu River proposals. One concern of mine is the many letters written about the conflict between the commercial fishing boats and the sport fishermen standing in the river, but there is no report of it by the full time fish and game employee. I could understand if it was a one time incident that it would be missed. But the letters are from many different people fishing at many different times of the season over several years. (I have seen and read some of the letters myself) Another concern is the waste of the bluish fish thrown up on shore. Again the full time fish and game employee has not seen it. I think that person needs to be questioned as to where and how his/her time was spent. How could so many other people experience the conflict and see the wasted fish, but not the fish and game person.

Dan Ernhart is my son and the manager of his company's lodge on the Tsiu River. He is passionate about his concerns for his customers and also the river itself. (and I, as well, am concerned about his safety) That is why he started this coalition, trying to get peace and order accomplished through the proper channels. I think you will find if you look at all of his proposals that his intentions were never to stop the commercial fishing, but find a way for all to peacefully enjoy the river. Hopefully you will decide to look further into this conflict that is impairing the quality of experience that both parties should be able to enjoy. Not to mention also before someone gets hurt.

Thank you for reading my concerns....

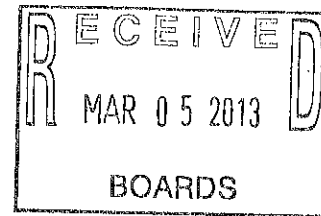
Marlys Ernhart  
15644 State 87  
Park Rapids, MN 56470

Cc: Board of Fish Chairman Karl Johnstone



March 16, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

My name is Maurice Bransfield and I live in Anchorage. I have been following the boards review of the proposal concerning commercial fishing (ways and means) and sport fishing for Silver Salmon on the Tsiu River. I have fly fished the Tsiu for years and spent thousands of dollars to fish this small but wonderful fishery for Silver Salmon. But, every year when I make my plans to fish where and when, there is one thought that always affects my decision to spend my hard earned money to fish the Tsiu and that is will there be commercial fishing at the same time. This is no small matter since I'll be spending thousands of dollars to fish a few days and live in fear that a boat with a large net will literally force me out of a fishing spot favorable to casting a fly for a chance to catch a silver, this is totally unacceptable and has a huge negative impact on the total fishery.

I fished the Tsiu last fall and had the worst encounter with commercial net fishing in my life. I was fly fishing for silver's in a small pool and having some success when a commercial fishing boat came right at me at a high rate of speed, running the boat onto the beach, forcing me to run in fear of being hit and thrown into the water. In a most crude and cavalier manner, they set up their nets right in the very spot I was fishing. I asked them what was going on and they said we can fish any where and time they wanted. They didn't care a nickel that I was there first and simply fly fishing this one small spot on the river. They proceeded to set up their nets and kill fish. They actually ran one of their boats above the nets in a wild and zig zag manner to harass and drive salmon back down river into their nets. If I harassed fish like they did I would be arrested and for good reason but not them....hum ! The worst part was that many of the fish were floating dead down river, what a waste ! Plus, they didn't care and had an attitude of get lost we own this river. One of them actually told me if I didn't like it to write my congressmen, kind of strange statement. They proceeded to do the same thing up and down the river. Taking fish and letting them sit in the sun, killing fish that got away from their nets, and in total disregard for sport fishermen or any authority.

Please reconsider your proposal and correct this horrific condition that exist on Alaska's best Silver Salmon fishery. Thanks for doing the just and honorable thing.

Sincerely,

Maurice Bransfield  
Capt. USAF Ret.  
Anchorage, Alaska

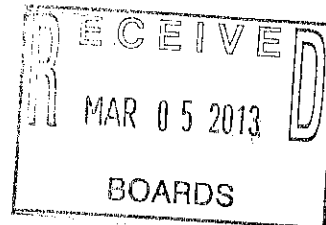
Cc: Board of Fish Chairman Karl Johnstone





March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

My name is Michael Loudon and I am an Oral and Maxillofacial surgeon practicing in Battle Creek, Michigan. I have followed Proposal 301 with interest as I have fished on the Tsiu River several times. I have recently stopped going to Alaska to salmon fish not due to the economy, but rather due to the antagonistic behavior of the commercial fishermen on the Tsiu as they used their boats to drive the fish both up river and down river into their nets. I have even had a fish that I was fighting cut off by them with their boat when I had the catch within 90 feet of the shore. I have seen them place their nets across the only channel deep enough for the fish to move up river and thereby allow no escapement of fish for us to catch. I have also seen the wastage of their salmon catch left on the sand. These are not anecdotal reports, they are my eyewitness accounts. At no time during my trips there did I ever see a Fish and Game warden to report this to. It is expensive to go to Alaska to fish the Tsiu River and I do not want to spend \$5,000.00 to have another trip spoiled by the commercial fishing operation on the Tsiu. Their behavior suggests that they feel that it is their resource and that the sports fishermen (who are bringing significant income to the area) are interlopers.

My questions to the board are as follows:

- 1) As Proposal 301 was in the public domain for many months, debated for approximately 1 1/2 hours, voted on and passed, why was supposedly new information suddenly found after the vote that forced a reconsideration of 301? As Board member Smith introduced the new information and was the only one to change his vote, it is obvious that the information was not that impressive and more importantly, that Smith's change was due to political pressure brought to bear on him after the initial vote. Unfortunately, as I am sure you realize, his political maneuvering reflects negatively on the Board as a whole.
- 2) As support of Proposal 302 and 303 was withdrawn after passage of Proposal 301, are they going to be put back before the Board and opened for public input?

Please right this wrong.

Sincerely,

Michael R Loudon

Cc: Board of Fish Chairman Karl Johnstone

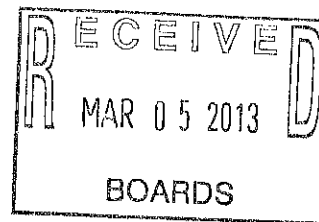


**GEFFEN MESHER**  
**& COMPANY, P.C.**  
CERTIFIED PUBLIC ACCOUNTANTS & BUSINESS CONSULTANTS

THOMAS MICHAEL ANDERSON, CPA  
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March 10, 2012



Re: Tsiu River Fishery

To Whom it may concern:

I have sport fished for Silver Salmon on the Tsiu River in Alaska 8 of the last 10 years. The Tsiu is a unique place and resource. I have followed with interest the developments of the Alaska Board of Fish, in their efforts to balance the legitimate users of the fishery – commercial and sport, while maintaining the resource.

In the last 5 years I have observed an escalation of behavior on the Tsiu that has become aggressive and dangerous. I believe the causes of this are:

1. Though mentioned in testimony before the Board, I have never observed, seen or been contacted by a State Fish and Game Officer at any time, any year, I have fished on the river. Why is that? If the Fish and Game Officer was on duty, would they not be observed by fisherman? How could they remain invisible? The only conclusion I can make is that either the Fish and Game Officer was never really on site or they stayed away from the River (where it would be easy to make observations, control dangerous usage of motor boats without regard to humane life in an effort "scare off" the sports fishermen from the river, etc.).
2. The Tsiu is a shallow river with narrow channels that are often no more than 3 feet deep. As you are aware, it is also short in length. Commercial fisherman use motor boats to "herd" salmon into set nets. I have observed this taking place with my own two eyes for several years. The nets are often strung all the way across the river. When this happens there is zero escapement for Salmon to swim up-stream where the sport





fisherman are relegated to. Add to this, commercial motor boat operators who seem to enjoy terrorizing sport fisherman – and you have a dangerous brew.

3. Regarding the unsafe use of motor boats, I have had run in while fishing on the river with commercial fishermen driving these boats. On two separate occasions, a motor boat was run past me at full throttle no more than 4 feet away while I was fishing. I got the message loud and clear – “get out of the river or else”.

What is the big deal of having the river divided into commercial and sport users sections? The solution offered under 301 (which was originally passed and then suspiciously overturned) makes total common sense. How could the commercial fishery be harmed by this solution?

The last point I wanted to mention is that I spend about \$5,000 in Alaska every trip I make. There are usually 4 members in our group – about \$20,000 per year. As I mentioned, we have done this for about 10 years, about \$200,000 into the local Alaska economy from just a group of 4 fly fishermen. The word is getting around on the West Coast in the lower 48 about what is going on up on the Tsiu. The status quo is not good – for any of us.

I urge the Board to reconsider this issue. Thank you for your consideration.

GEFFEN MESHER & COMPANY, P.C.

A handwritten signature in cursive script that reads "Thomas M. Anderson".

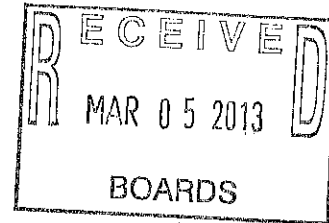
Thomas M. Anderson, CPA

Shareholder



March 12, 2012

To:  
Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

Dear Sirs:

This letter is in response to the apparent inability to resolve the commercial and sport fishing issues on the Tsiu River system

I have fished the system 3 times in the past 15 years with my wife and son. The first two times approximately 10 and 5 years ago were very enjoyable and were without conflict with the commercial interests fishing the river simultaneously.

The third trip ( August 31- Sept. 3, 2010) was a very different experience with conflict with the commercial interests. As with all things in life some of the commercial fisherman were friendly and helpful while others hostile to the sport fisherman and actually ran over my son's fly line with their boat in their herding of the salmon into their net. I have never seen a game warden or Fish and Game employee on the river.

Our family has spent additional money for lodging, food, supplies and artwork in Cordova during the trips as well as the purchase of fishing licenses.

I hope that the Board will consider the three proposals ( 301, 302, 303) and be able to come to an equitable solution to sport fishing and commercial interests.

Sincerely,

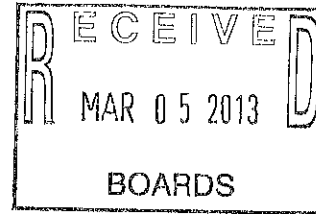
Pat Riley  
4895 Mountainshyre Road  
Reno, Nevada 89519  
(775) 826-7314

Cc: Board of Fish Chairman Karl Johnstone

To: Board of Fisheries  
From: Patrick Speranza  
VP Pescatore Systems Int. LLC  
11500 Discovery Heights Circle  
Anchorage, AK 99515

March 11, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I was astonished to read of your actions regarding proposal 301 (and inactions on 302, 303) in the Ketchikan papers. Having sportfished the Tsiu for at least the past 3 years, I've seen many examples of egregious behavior by some of the commercial fishers including harassing and wanton waste of fish. Mind you, I've nothing against commercial fishing and if done sustainably have seen it actually help the productivity of rivers. However, running skiffs both up and downstream to herd fish into gill nets, setting gill nets directly in front of sportfish folk (even pushing them out of the way on the beach to set a net stake), culling smaller or blushed fish from the nets and tossing them to float dead downstream is not, I think, legal or proper commercial fishing.

The annual trip the Tsiu is by no means, a cheap, easy or cavalier adventure -- it is expensive, transport, lodging alone can run several thousands of dollars and that's only for the Cordova/Tsiu portion. Many of the fishermen I've met on these trips -- in fact most, are from out of state and make this their annual Alaskan adventure. We all commiserate on the conflicts that appear to be growing between the commercial and sport fish communities -- the out of staters with horror stories of what has happened to their local fisheries due to set netting. As the popularity of this fabulous fishery grows -- and it has in just the three years that I've fished it -- so too have the conflicts between the two fishery groups. How do I explain to the folk from outside why all of the dead silvers are littering the beach after a night's culling?

Lastly, I have to say that I've never seen or met any fishery official -- ADF&G, or manager on the river, or in the area. I've heard rumors that there is one person charged with governing the area -- but I've never seen her. I thought that last year, 2011, I'd have met them for sure -- there was an "opening" after several weeks of closure, in late September, lots of net skiffs running the entire lower section of the river -- from just about the mouth to the airplane -- lots of netters settling around each other and lots of high speed corralling of the fish (even several collisions between boats! -- no one was hurt, but tempers rose....). I'd've thought that anyone tasked with overseeing the fishery would be there. Nope.

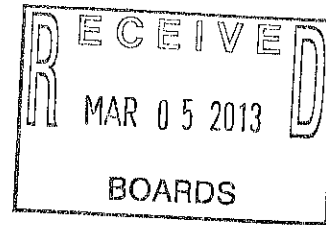
The proposals 301-303 are well thought out, simple guidelines to enhance both the sport and commercial fisher's activity -- please reconsider your decisions, and view the evidence impartially.

Thanks You,  
Patrick Speranza

Cc: Board of Fish Chairman Karl Johnstone

Paul E. Reinsch  
P.O. Box 849  
W. Yellowstone, Mt.  
59758 1=406-646-9577  
Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

March 10, 2011



**RE: Tsiu River**

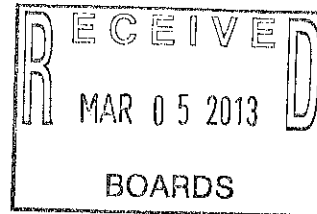
In Sept. of 2009 I booked a fly-out fishing trip with Wilderness Outfitters, out of Cordova. They have a lodge on the Tsiu River. I was aware that there was commercial fishing being done on the river before I booked the trip. The problem was we were told that they were not allowed to fish every day. I was led to believe that at least 2 or 3 days of our 5 day trip would be without them netting the fish. This was not the fact. They fished the river all 5 days of our stay, and on all 5 days they used a jet boat to herd the fish toward their nets. This was often done right thru the holes we were fishing. Some of the times they would slow down, when going by, but not always. Several times they came way too close for comfort. It finally got so bad we would get out of the water when we heard them coming. We learned that this was their last week on the river as the run had slowed down and they were trying to get as many fish as possible. The DC-3 was landing and taking off all the time. Apparently there is no one out there on the river to make sure they follow the rules, if there are any rules. I have learned that there is supposed to be a lady out there that wears a badge, and enforces the law, but she was in her stealth mode all five days we were there, because we never saw her. This trip booked for \$ 3,500.00 per person and there were 4 of us. That is \$ 14,000.00 and does include the air fare, or 3 nights in Cordova staying with Steve at Orca Adventure. So the grand total is over \$ 20,000.00 dollars. A lot to pay for a fishing trip that was in part ruined by rude commercial fishermen. If we would have had a couple of days on the river without them herding the fish it would have been better, or if there had been some part of the river where they were not allowed. It would be much better if they had a section of the river where they set their nets that did not interfere with sport fishermen. I would think that the upper half of the river would be a section where they would not want to set their nets as that is probably where more older fish are hanging out. This did not seem to be the case. They had their nets all up and down the river. And this caused a lot of fish to be discarded from their nets when they pulled them. These fish could be seen floating down the river. Not only did they not get harvested by the commercial fishermen, they didn't get caught by sport fishermen either and worse of all they didn't get a chance to spawn out. Would I book another trip to the Tsiu, Definitely not, would I recommend it to other fishermen, NO. If things were changed, probably yes. Because of the great guides at the lodge, fantastic food and lodging it was a good trip. Fantastic trip NO. could have been with just a few changes put in force on the river. Hope this can be done.

Paul Reinsch  
Those of us who were there  
Paul Reinsch, Lea Anne Reinsch, Joe Reinsch and George Knodle.

Cc: Board of Fish Chairman Karl Johnstone

March 12, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I have been a guest at the Tsiu River Lodge on two separate occasions over the last 5 years and have spent over \$5,000 total for the experience, not including air fare and AK license costs. Not once have I seen a representative of the AK fish and game department policing the activities on the river. Moreover, my fishing experience has been ruined numerous times by commercial fishermen "herding" the fish into their set nets on the river right in front of me and downriver from me. In both cases the fishing is obliterated.

The reversal of ruling regarding the sequestering of the commercial operation was confusing. How could a ruling that separates the two operations be the slightest bit wrong? As it now stands the two operations are in nearly constant conflict with little or no oversight. The reversal of the ruling only perpetuates the status quo and the status quo is bound to provoke more conflict. The matter is chaotic and to yield to pressure only leaves unsettled chaos on one of the best sport fishing rivers in Alaska.

Please reconsider your actions and reinstate the principles previously documented.

Peter W Truitt  
3595 Cherokee Drive South  
Salem, Oregon 97302

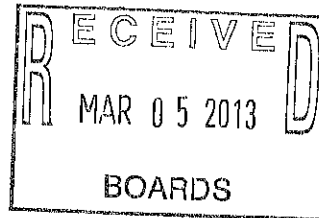
Cc: Board of Fish Chairman Karl Johnstone





March 12, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

I am very disappointed to learn of the decision to reconsider and reverse the earlier decision to provide some relief for us Tsiu sport fishermen.

I want to take this opportunity to comment on a few of the important issues from my perspective as an avid sport fisherman who at one time enjoyed fishing the Tsiu.

1. In the years past that I fished the Tsiu, I never once saw or even heard of a "resident" Fish & Game employee anywhere on the river. If I had been able to find one, I would have surely complained about being almost run down and virtually chased off the river by the "herding boats!"
2. I have observed numerous Coho left alongside the river by the commercial harvesters, Not sure why, but suspect it was due to their deep coloration.
3. The netters "herd boats completely disregard my presence on the river and at times cut right across my fishing line.
4. Changing a vote after one of the most thoroughly discussed and debated proposals, is questionable at best and leads to the suspicion of behind the scenes dealing!
5. I have reluctantly quit fishing the Tsiu as it is no longer an enjoyable experience and even entailed some physical risk from the commercial fishermen.
6. Sport fishing income may not be of important to Yakutat, but my 53000.00 to 54000.00 annual trip expenditure is to some venues.

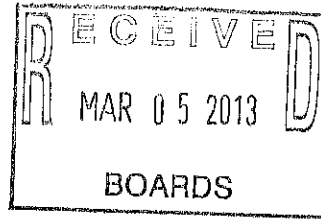
In short, I won't be back on the Tsiu as long as conditions remain as they are, there are too many other more enjoyable places to fish and spend my money. That is a sad statement, as Yakutat has the opportunity to make the Tsiu a wonderful sport fishing venue if it had the foresight!

Sincerely,

**PHIL ERICKSON**

3345 STONE VALLEY ROAD ALAMO, CALIFORNIA 94507  
Phone (925) 837-A278 Fax (707) 922-1465  
Email PhilErick@sbcglobal.net

Cc: Board of Fish Chairman Karl Johnstone



Wild Wind Farm  
5931 Graysontown Rd.  
Radford, VA. 24141.

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

RE: Tsiu River

I cannot believe the board overturned their decision. I'm sure outside pressure was the cause, and NOT additional late information as they stated.

This is a great disappointment for me and my colleagues. We have fished the Tsiu for many years now and every year we see many breaches of the regulations. We have confronted the Female Fishery Inspector and pointed out several serious incidents some possibly fatal. I personally have been knocked over by waves caused by the boats herding fish, in one instance I lost a fly line and almost a \$750 rod caught in the propeller of the boat. Unfortunately they drive the boats like mad men with NO consideration for others on the river. One day there WILL be a fatality what will the Board say then.....Too late to say sorry!

We have also witnessed many times hundreds of Salmon dumped and left for the bears and birds to clean up. Somewhere in my files I may have photos to show this.

Lastly, I think it is important for the Board to realize the financial benefit the sports fishermen bring to the area. Anchorage, Cordova, etc. My wife and I spend about \$20,000 in total for our 10 day trip, so in ten years we must be getting close to \$150,000 !

I agree the River should be harvested for commercial reasons but there must be safe accommodation for the sport fishermen. We must co-exist in harmony.

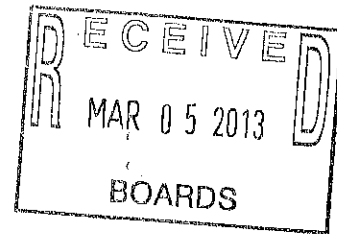
Best wishes and good luck.

Ray Barker-Smith. 12<sup>th</sup>.March 2012. Cell 540 314 0349.

Cc: Board of Fish Chairman Karl Johnstone



March 11, 2012



Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

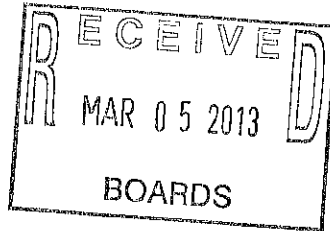
**RE: Tsiu River**

I am terribly disappointed that the Board reversed their decision, I have been following the progress of the meetings and I was so happy to hear about the original decision that I made calls to friends for a return trip this fall based on that decision. My group spends a lot of money to come to the Tsiu and fish, recent years have been very slow. I have been coming there on and off for 15 years and I couldn't believe what has happened with the commercial fishing and catches, I thought wow now there will be some proper management of this jewel, because in all my times on the river I not once saw a management officer, who is running the management and INFLUENCING decisions? Something is not right and smells of the whole dead fish I saw on the river banks, isn't there some jurisdiction or state law enforcement that should be made aware of the decision making process there?

Unfortunately, we will not be coming back to the Tsiu River unless there is better management.

Robert Rappaport 11111 Excelsior Blvd. Hopkins, MN 55343

Cc: Board of Fish Chairman Karl Johnstone



Ron Ott

7831 Fiftieth Street North  
Lake Elmo MN 55042

Phone 651-777-7527  
E Mail [vhfleo@mtn.org](mailto:vhfleo@mtn.org)

March 12, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

**RE: Tsiu River**

I have fished on the Tsiu annually for the past 11 years. In light of current discussions about river use perhaps some information about my experiences would be helpful,

In brief, there is the good, the bad, and the ugly.

Being on the Tsiu is so good (fishing, scenery, accommodations) that I have been willing to spend approximately \$700 a day to be there for 5 days, each year, for 11 years

Noise and competing with netters for fishing locations can make for a bad experience.

In areas where river depth varies from deep runs to a few inches, legally set nets can essentially block upstream fish migration owing to the shallow water beyond the nets. Equally ugly is being buzzed by high speed jet boat as netters go up and down stream, looking for places to set nets, often within casting distance of fishermen. Also it is most disturbing to see or hear boats herding fish into nets. Finally, once the fish are netted I have seen fish that are too red and unacceptable for the cannery may be improperly disposed of (this was especially recently when river levels were very low).

In my eleven years (55 fishing days) I have never seen or spoken with a Fish and Game employee. I fail to see how regulations are properly enforced.

Ron Ott  
PS

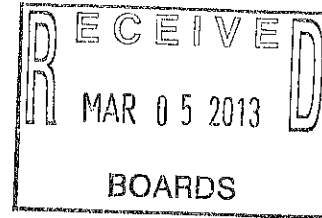
I would like to know if there has ever been a comprehensive study that compares the economic impact of sport fishing and commercial fishing.

Cc: Board of Fish Chairman Karl Johnstone



March 9, 2011

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



RE: Tsiu River

Dan, as always, good to hear from you. Please forward this letter to whom it concerns. Again, thanks for the hospitality shown to my wife and I, on the Tsiu, in 2010. It was a fishing trip of a lifetime for both of us. We have never caught fish like that in our life and we've spread the word about Alaska and the Tsiu. We are considering making another trip this year but are very concerned about the pending legislation, in reference to the commercial fishing practices. The only negative feeling my wife and I have from our visit in 2010, is due to the commercial fishing personnel, on the river, during our trip. You were there, as a witness that day, to what happened to me. While I was wading the river, catching fish, a commercial fisherman, in a boat, passed me at very close quarters, and went about setting his net. The net covered the entire navigable portion of the river channel, leaving the salmon no option, but the net. I looked around and saw the other sportfishermen (from the lodge) on the riverbank, not fishing but watching me in the river with the commercial fishermen. The people from the lodge had fished here before and "knew the drill" (get out of their way). This was my first time fishing the Tsiu, so it was a learning experience. As I continued fishing, the operator of the boat, ran circles around me, herding the fish, into the net. As the boat operator and another hand were removing the fish from the net and placing them into the transport tubs, he said, in a voice loud enough for me to hear, "I guess he doesn't know the fine for interfering with a commercial fisherman." I did nothing but stand in the river. What I would have given for a Fish and Game employee, to have been around. Later, this same date, I saw three (3) abandoned transport tubs, full of salmon, rotting in the sun. The bears and the seagulls were the only things that benefitted from those wasted, precious resources. It made me mad then and still does. You could see the wanton waste and knew it was wrong and the only people it bothered was the sportfishermen who were present. I was on the river for five days (in September) and never saw any sign of law enforcement personnel.

Dan, thanks for taking this challenge upon yourself, on behalf of all the sportfishermen, who fish the Tsiu. I know you have put in a lot of thought, effort and diligence, to bring Proposals 301, 302, and 303, before the board. I monitored portions of the meetings, on the internet. Upon Proposal 301's original passage, I thought maybe we were making headway, only to have the proposal, revisited and overturned, under ambiguous circumstances. The appearance of inpropriety, in the reversal of boardmember, Mike Smith's vote, is curious. I thought, oh well, the commercial fisheries have more money and 'stroke', so it's business as usual. From what I understand, this conflict between commercial and sport fishermen, is a long standing problem, which has not been addressed, either by the conflict resolution board of Yakutat (Scheinberg Report), Fish and Game, or the Governor's office. The time has come for resolution.

The sportfishing industry is a great boon to the Alaskan economy. Believe me, my wife and I certainly help support the Alaskan economy. My wife and I have made several cruise ship vacations to Alaska, and fished in several different locations, in Alaska and British Columbia, but we never ever caught fish, like we caught, in The Tsiu. I've already inquired with Alaska Wilderness Outfitters, about a trip this year, but I don't want to compete with the commercial fishermen. Trying to find a few days when they are not on the river. We really love traveling to Alaska, especially in the summer, when we need a respite from the heat. Again, on behalf of all the sportfishermen, who fish the Tsiu, Thanks for all your hardwork.

Have a blessed day.

Ronnie/Sherry Roberts

10021 Hwy 150

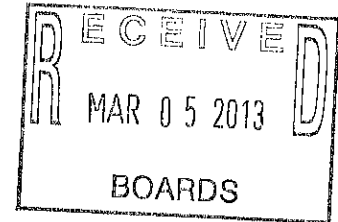
Shepherd, TX 77371

936-628-3102 Hm 713-882-0006 Mob [rroberts00@yahoo.com](mailto:rroberts00@yahoo.com)

Cc: Board of Fish Chairman Karl Johnstone

3/11/2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001

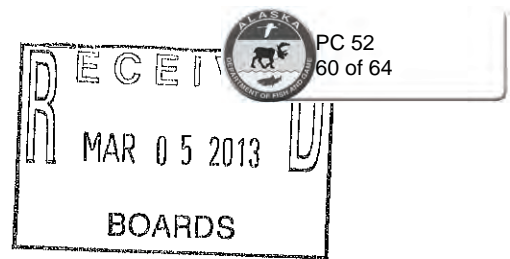


**RE: Tsiu River**

I have worked at the Tsiu River Lodge for the past 3 seasons. I have had the opportunity to spend a great deal of time out on the river as a Sports fishing Guide. In those 3 seasons I have been witness to a lot of harassment to our guests while they were simply trying to enjoy the vacation of a lifetime. I am all about sharing and compromise especially when it comes to those who have to use this resource as an income. However, is it truly necessary for the Commercial fishermen to come and drop their nets directly at our feet when we have just as much right to be there as they do? I can tell you that if I were a paying guest, who spent a great deal of money to come to Alaska, with my family and friends, and I had an experience such as that, I would think twice about coming again. I was witness to many times when the Commercial Opener's took place, and most of them would simply fly right by my guests as they stood in the river already fishing, with their lines in the water, with their high powered boats, coming DANGEROUSLY close to them, causing large waves and forcing them out of the water. I have to ask, is it really necessary for them to herd the fish into the nets when they have their nets  $\frac{3}{4}$  of the way across the river, already blocking the channel. The Coho have no choice but to swim into the nets, but yet they have to "rush" the process by using motorized boats. I find it completely unnecessary and simply appalling. I also was witness to one of our guests, who was wading in the river, at the mouth of the Tsiu, and here comes a boat, once again, zooming right past him, and he couldn't have been more than a foot or more away, and as he passed him, he swung his boat and started to spin it in a circle as he was trying to herd the fish into the net. The guest was overcome by the waves and went under the water and thankfully someone was nearby to jump in and grab him before he was swept away. I can honestly say that was a very scary experience not only for him, but for those who witnessed it. What happened to the man in the boat? Well, he simply kept going about his business as if nothing happened!!

I can't believe that incidents such as this actually take place, especially in one of the most beautiful places in the world. I hear people all of the time talk about how they want to come to Alaska. How can you justify putting people in harm's way all just to make a profit off of the fish. Is it truly necessary to allow boats with motors to achieve their quota for the day? Whatever happened to the good old fashioned way of simply placing the nets in the proper places and just let nature take its course? I really think it's sad that it has come to this. There are people that are trying to do good things, to make the Tsiu River a better place to be for EVERYONE involved and have spent years doing research, observing the changes that take place. How can anyone truly make a difference when we can't even get the support of the Board of Fisheries to objectively hear both sides?





I was able to listen to some of the meeting that took place recently in Ketchikan, and quite frankly, I spent a lot of the time shaking my head in disbelief! I heard someone talking about how there was a full time employee of the Fish and Game who spent the whole season out on the river. Not once did anyone approach the sports fisherman on the river, presenting a badge of authority. I know of a female, with brown hair, who was an employee of the Fish and Game, but I can tell you right now she didn't spend the whole day on the river. The time she did spend on the river, it was visiting some with a couple of the Commercial Fisherman on the other side of the river, and I do believe that one of them was her boyfriend. How can she possibly be trusted to tell the truth when anything illegal take place? I feel that it is a complete conflict of interest, and clearly she wouldn't be giving you all the information needed to show anything negative toward them. There were MANY occasions where I was bringing my groups back to the Lodge after a day of fishing, and seeing several dead fish laying on the banks of the river with net marks on them. I had also come across a FULL bin of fish that apparently had gotten stuck. So it was left behind, in the hot sun for the better part of the day. We had to drive by it several times.

I am simply telling you what I have been witnessed to. I know I am only one voice, but this has got to stop somewhere. The lodges on this river bring a huge income to the State of Alaska. They pay their leases, they take good care of their guests and we want to continue to provide a wonderful experience for them. Please take all of this into consideration. I am not asking to put the Commercial fishing to a halt. I believe that there is a way for ALL user groups to come to a friendly agreement and still be able to get a great experience out of it. It would really be a shame if it takes someone getting hurt out there, in order for something to finally get done about this.

I am asking you to reconsider proposal 301. As you have read, there is indeed Conflict between the 2 user groups. Plain and simple: something needs to be done about it before it's too late.

Sincerely,

Roslyn Sanders  
1415 34<sup>th</sup> St. S. #105  
Fargo, ND 58103

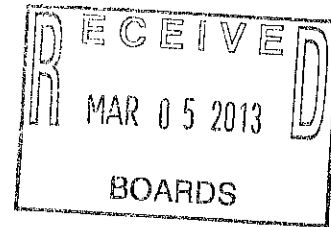
Cc: Board of Fish Chairman Karl Johnstone





March 9, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I am not sure if you are the correct person to receive this e-mail, but I would like to protest the recent actions of the Board of Fisheries regarding 3 proposals to regulate how commercial fishing for Silver Salmon takes place on the Tsiu river.

As a long time Alaska resident and a sports angler who has fished the river for 20 years I have seen fish harassed and wasted and I have seen sports anglers harassed and inhibited from fishing the river during commercial fishing openers. The 3 proposed regulations ( 301, 302 and 303) attempted to establish some guidelines around the commercial openers to create a safer and more enjoyable experience for all users of the resource.

I was not at the meeting of the Fisheries Board, but as I understand it Proposal 301 was actually approved by the Board before local politics resulted in a reversal of the ruling . The other 2 proposal were never granted proper review. It is unfortunate when one side of an argument has all the cards and allows no room for compromise.

I had hoped the State of Alaska had moved beyond these kind of back door deals but unfortunately that is not the case. If you are not the correct person to review this issue, I would appreciate it if you would forward the e-mail to those who are reviewing the activities of the Board of Fisheries.

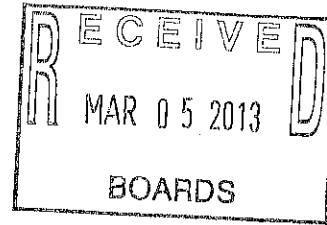
Steve Lambert  
7715 Eastbrook  
Anchorage, Alaska 99504

Cc: Board of Fish Chairman Karl Johnstone



3/11/12

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

I was recently extremely disappointed to learn that the proposed rule changes designed to reasonably address the on-going conflicts between commercial and sports fisherman on the Tsiu River were overturned at the last minute by a blatant conflict of interest by some members of the review board. As an avid sports fisherman on the Tsiu, I have seen first hand the unwanted impacts of the poorly monitored commercial fishing activities and wanton waste of fish by commercial fisherman on the river. In my two weeks on the river spanning the past 12 years, I have never seen a Fish & Game employee on the river, especially during commercial fishing operations, which appear to be unregulated. The unmonitored placement of gill nets and the herding of fish with boats almost assures 100% kill during designated commercial fishing days on the Tsiu. Moreover, on the day after commercial fishing operations, the banks of the river are littered with wasted fish that were not "good" enough or "too expensive" to ship back to the cannery as required by Fish & Game regulations. This is a tremendous waste of one of the finest silver salmon fisheries in Alaska. The conflict between commercial and sports fishery on the Tsiu needs to be addressed and actively managed by the Fish & Game to ensure that ALL users can enjoy the benefits of this tremendous fishery. To have the important resolutions not addressed is simply unacceptable and unfair to all parties concerned.

Sincerely,

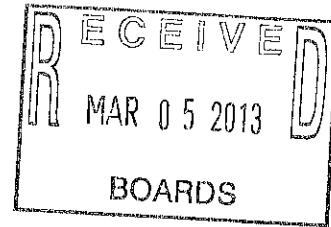
Steve Smith  
10807 Bossier Drive,  
Johns Creek, Ga. 30022

Cc: Board of Fish Chairman Karl Johnstone



March 12, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**RE: Tsiu River**

First off I wanted to thank Dan Ernhart for his hard work and dedication to the truly wild habitat of Alaska. Some people do not realize how truly unique the Tsiu river is because they live in Alaska and take it for granted, how sad. The native americans in days gone by would never waste food. What happened? Personally I have never witnessed the tragedy of waste, but I have seen the results and it is sickening. Lets talk about herding fish into nets, how could anyone in good a state of good mental health allow such a thing to happen. After spending thousands of dollars to come to the Tsiu and countless hours on the river I have never seen the full time on sight fish and game employee. I think it is time for the board to take a hard look at this for future generations not just for todays so called needs! Again thanks to Dan for all his hard work, I just hope this letter can help in some small way.

Terry Brosh  
President and  
CEO  
Brosh Chapel Inc.  
Ret.

Cc: Board of Fish Chairman Karl Johnstone

March 14, 2012

Governor Sean Parnell  
P.O. Box 110001  
Juneau, AK 99811-0001



**Tsiu River:**

I am amazed how uninformed the fishing authorities are regarding the commercial fishing practices on the Tsiu River. I have always been personally appalled at the way the commercial fishermen set their nets and then herd the salmon into the nets with their power boats. Also, it always amazes me to find dead or struggling salmon with net marks on them after the commercial fishermen clear their nets.....all seem to be "blushes"...Although there may be a market for "blushes" in Yakutat, my recollection is that the air freight to fly them there is a about \$.50 a pound. And in the three years that I have fished the Tsiu River I have never seen an Alaska Game Warden.

Attached is a letter that I sent during September 2009 to Brian Marston who is with the Alaska Department of Fish and Wildlife regarding a commercial fisherman incident that happened to me on the Tsiu River.. I tell the story....Nothing ever happened and the matter was dismissed. I have lost the pictures that I originally attached.....

Dear Brian

Last Thursday, September 17, 2009, at approximately 9:30 a.m., I was fly fishing with four friends on the Tsiu river with Alaskan Wilderness Outfitting Company when a commercial net fisherman landed his jet boat in the bottom of the hole that we were fishing and proceeded and set his net across the bottom of the hole. I was playing a salmon that I had hooked at the time and the commercial fisherman just set his net about 20 yards downstream from where I was playing the fish. It was as if the commercial fisherman wanted my salmon to get caught in his net. I landed the fish, released it and watched in horror as the commercial fisherman went to the far top end of the hole above where my friends were fishing and proceeded to use his jet boat to herd all of the fish down stream into his nets. It was deliberate and intimidating. He used a series of figure 8 maneuvers that balled up the river. He had miles of open water to set nets, but he chose our fishing spot to make his non verbal statement of disgust for sport fishermen. At the end of his boat maneuvers all of the salmon in hole were netted or spooked. We left to find another place to fish.

I took pictures of the incident and believe that the commercial fisherman was upstream from the commercial fishing boundary and thus in violation of 5 AAC 39.190. Driving salmon prohibited (It is unlawful to drive or attempt to drive salmon from waters closed to salmon fishing) I have attached those pictures. One of the pictures shows the boundary marker on the shore as a white dot just above the bow of the boat. The other picture shows it near his shoulder. The boat is facing downstream in both pictures. I have sent high resolution pictures so may be able to confirm the violation and identify this despicable person. The culprit was about 30 years old, black hair, fair complexion, black thin moustache, medium build and height. His wife and a small child looked on as he ruined our fishing.

I have enjoyed sport fishing in Alaska for the last ten years and have been a tourist and business visitor in past times. I have always enjoyed the people and respected them and their unique way of life and ultimate respect for nature. This commercial fisherman is a huge stain on your tourism industry. Although the fishing was excellent on our trip, the story is about the ass that ruined it for us.

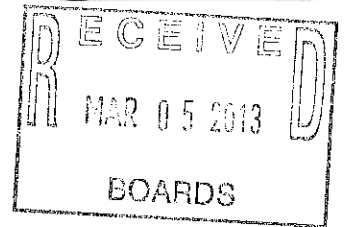
Do all fishermen a favor and cite this individual or revoke his license.

Should you have any questions, please contact me at 503 490 1474.

Regards

Thomas O Moe  
Attorney and CPA

Cc: Board of Fish Chairman Karl Johnstone



The Alaska Board of Fish

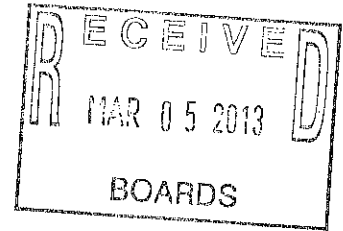
**Petition in Support of Adding Pacific Herring to the State of Alaska's Forage Fish Management Plan**

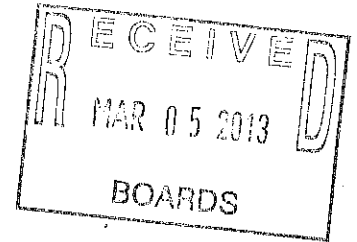
To the Alaska State Board of Fisheries through Chairman Johnstone,

I support the regulatory change, Board of Fisheries proposal 249, which would add Pacific herring (*Clupea pallasii*) to the State of Alaska's Forage Fish Management Plan. The existing administrative code (5AAC 39.212) fails to include all species of forage fish indigenous to the waters of Alaska. The board recognizes that abundant populations of forage fish are crucial to sustaining healthy populations of commercially important salmon, groundfish, halibut, and shellfish species. Herring are an ecological keystone prey species for many finfish populations, marine mammals, and terrestrial and marine birds. Please add Pacific herring to the State of Alaska's Forage Fish Management Plan. Failure to do so will compromise the existence of herring stocks throughout the State of Alaska.

	<b>Name</b>	<b>From</b>	<b>Comments</b>
1.	Jeff Feldpausch	Sitka, AK	
2.	Elaine Alfaro	Felton, CA	
3.	Dennis Kaplan	Mayfield Heights, OH	
4.	silja salonen	Toronto, Canada	
5.	Zara Stoyanova	Plovdiv, Bulgaria	
6.	Lillian Feldpausch	Sitka, AK	
7.	Dinda Evans	San Diego, CA	
8.	Vicky Pitchford	Toronto, Canada	
9.	Ana MESNER	Ljubljana, Slovenia	
10.	Steve Dale	Frankston, victoria, Australia	

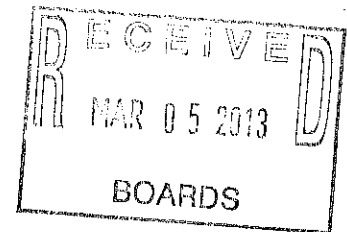
	Name	From	Comments
11.	Elena Tulina	Paris, France	
12.	Bettina Lorenz	Rhede, Germany	
13.	Laura Saxon	Morrison, FL	
14.	Daniela Bress	Salzgitter, Germany	
15.	Bill C	Kempten, Germany	
16.	Ernes Bertolo	Almese, Italy	
17.	Nicole Weber	Pasadena, MD	
18.	Helene Beck	Aarhus, Denmark	
19.	Joe Renneke	Eden Prairie, MN	
20.	Tyler Harrington	Peasleeville, NY	
21.	maghiar stela	Oradea, Romania	
22.	Heike R	Cologne, Germany	
23.	Jessica Gill	Sitka,, AK	Save the herring!
24.	Heather Riggs	Sitka, AK	I've personally watched the Sitka Sac Roe fishery take place for the last 15 years. This vitally important forage fish is being harvested solely for the eggs (roe). Males are taken along with the females. The waste involved is mind boggling. I whole heartedly support adding Pacific Herring to the forage fish management plan and support a more conservative/ecoosyem based management approach if this fishery is to continue.
25.	Elisabeth Bechmann	St. Pölten, Austria	
26.	Kurt Frees	Cincinnati, OH	
27.	Mervi Rantala	Tampere, Finland	
28.	Sharyn Ferrick	Sitka, AK	
29.	Isabel Travesset	Barcelona, Spain	
30.	Elizabeth O'Halloran	Kettering, United Kingdom	
31.	Maryann Staron	Evergreen Park, IL	
32.	Kim Elliot	Sitka, AK	
33.	William Peters	Sitka, AK	
34.	Francis Langkab	RANAU, Malaysia	
35.	Pavel Soukup	Lomnice N Pop, Czech Republic	
36.	Rook Hoyer	Lees Summit, MO	
37.	Alan Haggard	San Diego, CA	
38.	Jason Green	Spotsylvania, VA	
39.	Fred Fall	Cherry Hill, NJ	





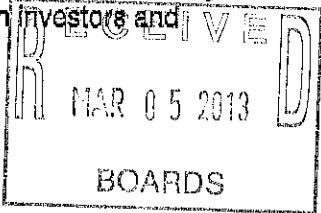
	Name	From	Comments
40.	Marian Allen	Sitka, AK	
41.	H Meuret-Woody	Sitka, AK	
42.	Beth Clark	Fleet, United Kingdom	
43.	Amanda Anderson	La follette, TN	
44.	M.J. Lord-Wild	Elfin Cove, AK	
45.	Timothy Piazza	Ketchikan, AK	
46.	David Bernhardt	Sitka, AK	
47.	Aaron Bean	Sitka, AK	
48.	Michael Baines	Sitka, AK	The herring will be gone soon if something isn't done immediately!
49.	Charles Bingham	Sitka, AK	We must protect our forage fish, all of them. If they aren't around, then neither are our larger fish -- salmon, halibut, rockfish, etc. The humpback whales that frequent our area also won't have food, and the same for sea lions and other marine mammals. We have to manage for the whole ecosystem, not pick and choose to exempt a couple of species from proper management because they're highly profitable.
50.	Jason Mears	Sitka, AK	
51.	Rebecca Fritz	Sitka, AK	
52.	Timothy Hoyt	Sitka, AK	
53.	Roy Martin	anchorage, AK	If we save the Herring.....We will save many other Species ! We are releasing Millions of Hatchery Fish each year that feed on Herring. Think about it.
54.	Batty A Baines	Sitka, AK	
55.	Penny Buckingham	Everett, WA	
56.	Kitty WILSON	Sitka, AK	
57.	Terry Kennedy	Millstadt, IL	
58.	Linda Whipple	Stockton, CA	
59.	elisha wright	bothell, WA	
60.	Catherine VanVeen	Sitka, AK	
61.	Lexi Fish	Sitka, AK	Re-evaluating the management of this keystone species is crucial for our region's long term economic and environmental prosperity.
62.	Bryan Whitson	Sitka, AK	
63.	Robert Sheesley	Tacoma, WA	Really? Sorry but that is all I have to say. I've signed
64.	Fred Hoeksra	Quilcene, WA	

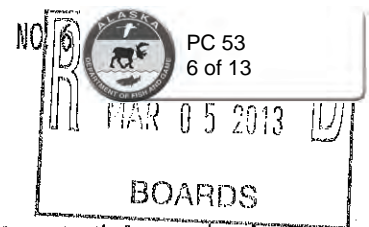




	Name	From	Comments
65.	Kem Bailey	Lafollette, TN	
66.	Edward Laurson	Denver, CO	
67.	suzanna tinch	lafollette, TN	
68.	Carolyn Tubb	Sevierville, TN	
69.	richard hall	Waterlooville, United Kingdom	
70.	Anne Elise Pollnow	Sitka, AK	
71.	Kathleen Wendt	Ward Cove, AK	We must protect the herring to have successful management of all other finfish species and survival of other marine animals in Alaskan waters. Please take the responsible measure and list them as a forage species.
72.	Vivian Smiddy	LaFollette, TN	
73.	Hiroko Kushibe	Ichiharashi, Japan	
74.	Rose Dobbs	Puyallup, WA	
75.	Kacie Bernhardt	Durango, CO	
76.	Christina Munko	Harrisburg, PA	
77.	Haley Burkhart	Sitka, AK	
78.	Vija Pelekis	Cordova, AK	
79.	Richard K. Nelson	Sitka, AK	<p>I am a 30 year resident of Sitka, a subsistence fisherman, and a strong supporter of our commercial fishing industry, as well as tourism. All of these vital parts of Sitka's economy depend in significant ways on a healthy and abundant population of herring. This means herring should have a very high priority as a foundation species in our marine ecology. One of the most basic principles of herring and fishery management should emphasize that herring are a major forage fish. Not including them within this category is like imagining that rain is not precipitation or plants are not vegetation.</p> <p>To protect the health of our marine ecosystem and local economy, it is fundamentally important that we correct this error in Alaska's Fish Management Plan.</p> <p>Thank you. Richard K. Nelson Sitka, Alaska</p>
80.	Jonathan Forsling	Togiak, AK	<p>I sit on the Togiak ADF&amp;G Advisory Committee and have been trying to get the department to realize the importance of Pacific Herring to the ecosystem. They completely fail to consider traditional ecological knowledge gained over hundreds and thousands of years from the local native communities as to the abundance of the species prior to human exploitation and the positive impacts to the environment from herring abundance. The ASA HMY (continues on next page)</p>

	Name	From	Comments
80.	Jonathan Forsling	Togiak, AK	<i>(continued from previous page)</i> management method does not work for forage fish as it fails to consider the negative impact to the ecosystem.
81.	Leland McGee	Sitka, AK	Pacific herring are a "forage" fish. They belong on the State of Alaska's Forage Fish Management Plan (FFMP). Please put them on the FFMP list immediately.
82.	James Mulcare	Clarkston, WA	Out of control corporate greed is decimating the herring stocks. The state is in bed with foreign investors and buyers.
83.	Deb Corso	Sitka, AK	
84.	Skye Bickar	Sitka, AK	Please let's Educate all by teaching that placing herring on the list of State of Alaska's Forage Fish Management will NOT hamper their ability to make a living!
85.	Gaylin Maghupoy	Kodiak, AK	
86.	Erika Casolato	Kodiak, AK	
87.	Victoria Canul Dunne	Sitka, AK	
88.	brian rezek	Sitka, AK	Been living in Sitka since 1975 and have been watching the fishery as every Sitkan does and have seen a steady decline in the amount of spawn and the area of spawn. I know this isnt a scientific way of approach but even a blind man can see that we are over fishing. Over the years I have watched school of herring in our sound and surrounding areas so think you could almost literally walk across the bay. Today, we are luck to see a half mile of spawn anywhere close to town. Come on! dont need to be a fish biologist to know that we are wiping out the runs. Might also have to do with some of the declining stocks of wild salmon... herring is a food source. This year during the sea roe fishery I suspect an entirely different approach than another record catch level. It has been poorly managed like most other ares of the fisheries. Iva witnessed this decline first hand. the only solution is to shut it down for a few years and see if the herring stock return. I just pray that it isn't too late...
89.	Eric Morrison	Juneau, AK	Family members who live in Alaska fish for herring every year. If the science is ignored, there will be no herring left.
90.	April January	Bethel, AK	
91.	Cyril Zuboff	Juneau, AK	
92.	Della Cheney	Juneau, AK	
93.	Paula Gadiante	Portland, OR	Effect management needs to happen now. There has been a steady decline of herring. The indigenous people of Alaska effectively managed not only the herring but all foods of the land. This is not rocket science, so lets work <i>(continues on next page)</i>
94.	Eunice James-Lee	Sitka, AK	

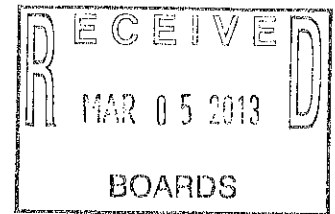




	<b>Name</b>	<b>From</b>	<b>Comments</b>
94.	Eunice James-Lee	Sitka, AK	<i>(continued from previous page)</i> together to ensure the herring continue to thrive and not steadily decline.
95.	george chappell	Juneau, AK	
96.	leslie isturis	Juneau, AK	
97.	Sharon wright	Sitka, AK	
98.	Janice brown	everett, WA	I personally would like to see why its decline and work on this ...and not wait until my grandchildren are my age
99.	Roberta Johnson	Juneau, AK	
100.	Todd Perdon	Juneau, AK	The time has come, we've lost the biomass in Auke Bay move now
101.	Michele Martin	Juneau, AK	
102.	Lance Twitchell	Juneau, AK	
103.	Anthony Stock	Chandler, AZ	
104.	Greg Brown	Juneau, AK	
105.	Joanna fairchild	Juneau, AK	
106.	Hannah Guggenheim	Sitka, AK	
107.	Nicholas Galarin	Sitka, AK	
108.	Thomas Skeek	Douglas, AK	
109.	Debra Dementi	Anchorage, AK	
110.	Amber Kitka	sitka, AK	
111.	Beatriz Fernandes	Sao Paulo, Brazil	
112.	Lisa Dry	Liverpool, United Kingdom	
113.	Stephane Velasco	Campo Grande, Brazil	
114.	Aquaea Marshall	Milton Keynes, United Kingdom	
115.	Riina Mikkonen	Järvenpää, Finland	
116.	irene youssef	Cairo, Egypt	
117.	carol Bell	Derby, United Kingdom	
118.	froidure sandrine	Hamelet, France	
119.	Mel Tzitzileri	São Paulo, Brazil	
120.	Jorge Marques	Maia, Portugal	
121.	Chafne Sabrina	Lyon, France	
122.	mirela ermenkova	Sofia, Bulgaria	
123.	Loredana Mainardi	Roma, Italy	

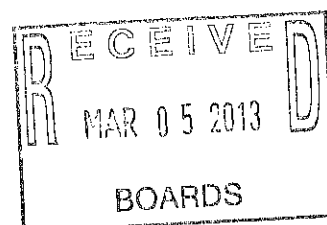


	<b>Name</b>	<b>From</b>	<b>Comments</b>
124.	jazmine ganado	Gebu City, Philippines	
125.	marc sixdeniers	Paris, France	
126.	Nathalie Quesnel	Calais, France	
127.	xxxx xxxxxx	Xxxxxx, Denmark	
128.	Laura McCoy	Arlington Heights, IL	
129.	Kirsty Donaldson	Johannesburg, South Africa	
130.	Helio de Souza Jr	Sao Paulo - Sp, Brazil	
131.	Reid Walsh	Newmarket, NH	
132.	Petra Hegenscheidt	Essen, Germany	
133.	Michelle Alves	Póvoa De Varzim, Portugal	
134.	MARCO PARRAVICINI	Milano, Italy	
135.	silvia premoli	Milan, Italy	
136.	emanuela pelizzola	Cassina De Pecchi (Milano), Italy	
137.	Elizabeth Fleischmann	Philadelphia, PA	
138.	Carmely Guizar	Antigua, Guatemala	
139.	Martine Cuisinaire	Heer, Belgium	
140.	paquay yvette	Lessines, Belgium	
141.	Jean-Nicolas Mathy	Cenon, France	
142.	b bouman	Haarlem, Netherlands	
143.	Lori Massey	Sumner, IL	
144.	Gerald McClinton	Juneau, AK	
145.	neyret sylvie	Sao Paulo, Brazil	
146.	Laura Revels	Anchorage, AK	Help protect our traditional foods for generations to yet come. Gunalohéesh.
147.	julie brown	Durham, United Kingdom	
148.	Carol Bush	Wasilla, AK	
149.	Ornela Mebelli	Tirana, Albania	
150.	Sandra Firestack	Juneau, AK	



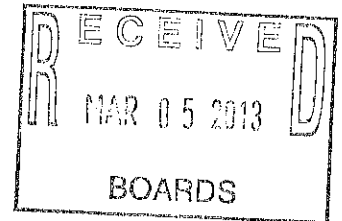


	<b>Name</b>	<b>From</b>	<b>Comments</b>
151.	Isaac Cadiante	Durango, CO	I am a member of the Tlingit tribe of Southeast Alaska. I have lived with herring eggs and dried herring my entire life. I also have family that is successful in the commercial herring fisheries in Sitka Sound. I would like ADF&G to protect these resources for both indigenous, non-indigenous as well as commercial and non-commercial users.
152.	LIVRIERI CHANTAL	Grenoble, France	
153.	nicole de beukelaer	Braine L'alleud, Belgium	
154.	launay muriellie	Laval, France	
155.	sagna christine	Pepinster, Belgium	
156.	corinne vanbegin	Bruxelles, Belgium	
157.	Justin Parish	Juneau, AK	
158.	kaatje adams	Brabant, Netherlands	
159.	Marla Oliveira	Lisboa, Portugal	
160.	audrey mason	Heer, Belgium	
161.	michal vaxman	Toronto, Canada	
162.	Gabriella Sekutereki	Lake View, NY	
163.	ANGE SWART ALF	Andenne, Belgium	
164.	jocelyne lapointe	Terrebonne, Canada	
165.	oamille paulsen	Nimes, France	
166.	Heidi Christensen	Ringø, Denmark	
167.	George Partlow	Douglas, AK	
168.	Olivia Sinalko	Juneau, AK	
169.	Peter Naoroz	Juneau, AK	
170.	Agnes Lundy	Juneau, AK	
171.	Michael Jenkins	Juneau, AK	
172.	Gary Lang	Sitka, AK	
173.	Ruriko Maeda	Chibaken Ichiharashi Aobadai, Japan	
174.	Kimiko Maeda	Chiba, Japan	
175.	Caitlin Gill	Bozeman, MT	
176.	will Jackson jr	ktn, AK	
177.	Krystyna Stuchliková	Susice, Czech Republic	
178.	Erica Wilson	Jacksboro, TN	





	<b>Name</b>	<b>From</b>	<b>Comments</b>
179.	Ingrid Chiraz	Montreal, Canada	
180.	Nancy Kniivila	Auke Bay, AK	
181.	Linda Gill	Vancouver, WA	
182.	Max Mielke	Juneau, AK	
183.	Trish Dobreiner	Fort Myers, FL	
184.	Lucas Schneider	Juneau, AK	
185.	Ted Mickowski	Auke Bay, AK	
186.	Elizabeth Berg	Seattle, WA	
187.	Signe Wilson	Sitka, AK	"If we want to get where we want in terms of salmon sustainability, herring are the first step." Ken Lertzman, Simon Fraser University Researcher
188.	Paulo Cesar	Mogi Das Cruzes, Brazil	
189.	Aniko Horvath	Babolna, Hungary	
190.	Jose Barber Luna	Los Angeles, CA	
191.	Żaneta Iwon	Baranów, Poland	
192.	Darlene Kauffman	Bristol, WI	
193.	Patrick Schniegeler	Berlin, Germany	
194.	dave falcon	Pencouik, United Kingdom	
195.	Bonnie McCrimmon	Verdun, Canada	
196.	Maja Jezdovic	Uzice, Serbia And Montenegro	
197.	Jana Pendragon	Long Beach, CA	
198.	audray lapointe	Drummondville, Canada	
199.	rex tyler DTM	Berkhamsted, United Kingdom	add them please add them
200.	Marina La Placenta	glasgow, United Kingdom	
201.	Debbie Pollet	Cedar Rapids, IA	
202.	Marilia Calixto	Ceres, Brazil	
203.	Cindy De Leener	Manhay, Belgium	
204.	Iva Chmelařová	Česká Kamenice, Czech Republic	
205.	carlotti mireille	Toulon, France	
206.	Heike Obergantschnig	Bushkill, PA	





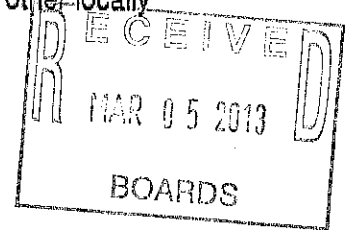
	Name	From	Comments
207.	Thomas Jackamo	Rye, NY	
208.	Sonia Sanz	Benetusser, Valencia, Spain	
209.	Jocelyn rowbotham	North Walsham, United Kingdom	
210.	sam sop	Ny, NY	
211.	Guilherme Turco	Americana, Brazil	
212.	Nia Garcia	Ridgewood, NY	
213.	Fam Boland	Grovetown, GA	
214.	Sarah Schauer	Battle Ground, WA	
215.	Courtney Wenneborg	Seattle, WA	
216.	Susan Sohrantz	Vancouver, WA	
217.	Phil Janney	Vancouver, WA	
218.	Joan Murray	Vancouver, WA	
219.	Stephanie Edmondson	Battle Ground, WA	
220.	Katie Maldonado	Ridgefield, WA	
221.	Thomas Moreno	Sitka, AK	
222.	wesley harris	Juneau, AK	
223.	Jacqueline Androsko	Juneau, AK	
224.	Alberta shields	Klawock, AK	
225.	Charles Bingham	Sitka, AK	If you lose the herring, you lose the salmon, the whales, the sea lions, etc.
226.	Darren Lovelace-Smith	Anchorage, AK	
228.	ernestine hanlon abel	hoonah, AK	
229.	Jerrold Galanin	Sitka, AK	
230.	Fred Moe	Wasilla, AK	
231.	Kathleen Menke	Haines, AK	
232.	Carla Carrico	Yelm, WA	
233.	Jared Barlow	Klawock, AK	We need to keep the Pacific Herring alive. It helps sustain the rest of the ecosystem here in S Alaska. Japan does not care about Alaska, and no one else really cares what happen to SE Alaska as long as they get their herring eggs. Well the only way for SE Alaska to survive is to have the herring species alive. If anything it should be limited to subsistence usage only by blood Alaska Natives. (continues on next page)







	Name	From	Comments
233.	Jared Barlow	Klawook, AK	<i>(continued from previous page)</i> Not only are you killing the salmon species by taking away their food, but you are also killing the Alaska Native People. They need this in their diet just as much as salmon, seaweed, seagull eggs, and other locally subsistence foods.
234.	vicki fears	ilburn, GA	
235.	Shingo Hamada	Hokkaido, Japan	
236.	Linda Woolf cooper	Hollywood, florida, FL	
237.	Dagny Danga-Storm	Bethlehem, PA	I have family who live in Alaska, & I care about the future of our ecosystem & environment.
238.	Thomas Thornton	Oxford, United Kingdom	see research on Local and Traditional Knowledge of herring in Alaska ( <a href="http://herringsynthesis.research.pdx.edu/">http://herringsynthesis.research.pdx.edu/</a> ). There is no question that herring are vitally important as an ecological and cultural keystone species; they must be managed more conservatively and systemically throughout the N. Pacific.
239.	Tolga Suslu	Ankara, Turkey	
240.	Jason Garms	o'fallon, IL	
241.	William Diamond	Sitka, AK	
242.	Laura Duffy	San Francisco, CA	
243.	Nova Hernandez	APO, AE	
244.	robin lovelace	anoorage, AK	
245.	Chad Titell	Sitka, AK	
246.	Ricardo Morales	sitka, AK	
247.	Edward Wurtz	Bellingham, WA	Allowing fishing to extinction is not fisheries management. Add Pacific herring to the State of Alaska's FFMP.
248.	Patrick Pavila	Tuntutuliak, AK	I think that Pacific Herring should definitely be listed in the FFMP. It is well known that Pacific Herring is forage fish
249.	Michelle Ridgway	Juneau, AK	Recognition of herring's role in our foodweb as a key forage species is essential for adapting management to incorporate ecosystem uses of herring, as well as our own.
250.	Juneau Juneau Audubon Society	Juneau, AK	Pacific herring are crucial to the food web for other fish, sea mammals, and countless birds. Please make sure the stocks are healthy and protected from over fishing.
251.	Raghda Hasan	Alexandria, Egypt	
252.	Robert Rice	ketchikan, AK	personally witnessing the local decline in herring stocks is alarming. They still have not noticeably increased, in southern southeast Alaska, since commercial roe harvesting was closed. Keep the food chain intact. Protect our herring, please
253.	Drena McIntyre	Fairbanks, AK	





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BOARDS

	Name	From	Comments
254.	Viviane Barry	Suquamish, WA	I wholeheartedly support the Sitka Tribe in their efforts toward a more conservative Herring fisheries management.
255.	Greg Blankenship	Sitka, AK	
256.	David Egelston	Thorne Bay, AK	Holistic approaches to fisheries management is the most intelligent way to manage all fish and the wildlife that also depend on them. I strongly encourage having Pacific herring listed on Alaska's FFMP.
257.	Dan Williams	Sitka, AK	
258.	Alison Dyvig	Haines, AK	
259.	Jeff Moebus	sitka, AK	we can't afford to screw this one up like so many other fisheries have been screwed up in the past....
260.	Paphaphit Wanasuk	Oxford, United Kingdom	
261.	Steve Marx	Portland, OR	
262.	Manue Martinez	Kihel, HI	
263.	Doy Michelle Morrell	Juneau, AK	Please add Pacific Herring to the FFMP for better management of our fishing resources.
264.	Bob Sam	Sitka, AK	
265.	ben contag	port armstrong, AK	leave all herring fisheries alone
266.	Scott Tinch	lafollette, TN	
267.	Jon Sidorovich	Murphys, CA	
268.	Lance Preston	Sitka, AK	
269.	Dasha Contag	Port Alexander, AK	
270.	Emily Reilly	Sitka, AK	
271.	Patricia OBrien	Juneau, AK	
272.	Charles Russell	Kodiak, AK	I urge the board to pass Proposition 243. This proposal can only lead to smarter management of Pacific herring. Take a step in the right direction and pass this proposal.
273.	Luke Kelly	Seattle, WA	
274.	Janis Contraro	Suquamish, WA	
275.	Kathy Bradley	Suquamish, WA	
276.	James Abler	Suquamish, WA	
277.	Rose Zrout	Poulsbo, WA	
278.	Leah Rodriguez	Eagle River, AK	
279.	Kathy Kinsey	Suquamish, WA	
280.	Nels Lawson	Sitka, AK	on Feb 25, 2013 The Alaska Native Brotherhood, Camp 1 and Alaska Native Sisterhood, Camp 4 voted unanimously to support adding pacific herring to the forage fish management plan (continues on next page)



MAR 05 2013

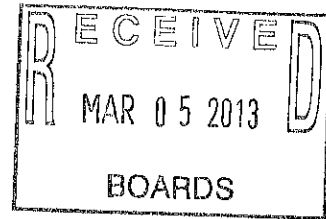
BOARDS

	Name	From	Comments
280.	Nels Lawson	Sitka, AK	<i>(continued from previous page)</i> Nels Lawson, President, Alaska Native Brotherhood, Camp 1
281.	David Mills	Bremerton, WA	
282.	Joseph smyth V	Sitka, AK	thanks
283.	Teresa Lane	Sitka, AK	
284.	Mike O'Meara	Homer, AK	Pacific herring should be managed as a forage species allows allow more effective management during times of stress. Given their key role in the marine food web, should Alaska herring stocks become depleted, the negative Impacts would be wide spread and harmful to the marine environment and human uses.
285.	Till Greenewald Abbott	Mtn Home, ID	
286.	Damian Shaeffer	Gig Harbor, WA	
287.	Misty Castaneda	Suquamish, WA	
288.	Rebecca Rens	Ogden, UT	
289.	EDWARD G. MRKVICKA	Arvada, CO	
290.	Valerie Ozawa	sitka, AK	
291.	Jon Feldpausch	Sitka, AK	
292.	Vilda Cooday	Juneau, AK	
293.	Seth Feldpausch	Sitka, AK	
294.	April Rezek	Sitka, AK	
295.	Josephine guthrie	Ketchikan, AK	
296.	Gianna Willard	Ketchikan, AK	
297.	Melissa Moesburg	Sitka, AK	
298.	Sampson Nickerson	Klawock, AK	
299.	Mayme Nickerson	Klawock, AK	
300.	Kennth Armour	Klawock, AK	
301.	Miranda Littlefield	Sitka, AK	



Christopher Wichers  
Mile 10.5 K-Beach Road  
Kenai, Alaska 99611

March 4, 2013



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

Dear Board of Fish Members,

My name is Christopher Wichers, I am 26 years old and have grown up set net fishing on Kalifornsky beach. My family was set net fishing before I was born, and I have now invested in the industry as well. It is honest hard work, and I can't image it not being part of my life.

The summer of 2012 was financially and mentally devastating to my family and I. We hired extra help in preparation of a good season and then after we were shut down we had to let several of our crew go due to no fishing time for eastside setnetters. I am going to keep my letter brief, and say that I am in support of proposal 249. I believe that proposal 249 is a fair proposal which will protect the salmon stock as well as the concerns of all user groups. The summer of 2012 was extremely difficult, looking forward, using scientific facts, and allowing fish and game some additional tools, hopefully we will not see a repeat of this difficult summer.

The Alaska sockeye fishery and its harvestable surplus is important to recreation and commercial groups alike. Proposal 249 will help protect this and other fisheries for future generations. Thank you for your time and consideration on helping to make this a fair and sustainable fishery.

Sincerely,

Christopher Wichers  
Eastside set netter K-Beach



*ADF&G received 526 signed petitions titled “Petition in Support of Adding Pacific Herring to the State of Alaska’s Forage Fish Management Plan.” The wording on all the petitions were identical and the verbiage on each letter and all the names who signed the petitions are included below. One original is attached. All original signed documents have been retained for public records purposes, but will not be presented as individual RC’s in the Board record.*

## **Petition in Support of Adding Pacific Herring to the State of Alaska’s Forage Fish Management Plan**

To the Alaska State board of Fisheries through Chairman Johnston,

I support the regulatory change, Board of Fisheries proposal 243, which would add Pacific herring (*Clupea pallasii*) to the State of Alaska’s Forage Fish Management plan. The existing administrative code (5AAC 39.212) fails to include all species of forage fish indigenous to the waters of Alaska. The board recognizes that abundant populations of forage fish are crucial to sustaining healthy populations of commercially important salmon, groundfish, halibut, and shellfish species. Herring are an ecological keystone prey species for many finfish populations, marine mammals, and terrestrial and marine birds. Please add Pacific herring to the State of Alaska’s Forage Fish Management Plan. Failure to do so will compromise the existence of herring stocks throughout the State of Alaska.

- |                       |                             |                           |
|-----------------------|-----------------------------|---------------------------|
| 1. Dustin Newman      | 20. David Foellinger        | 39. Joey Stamps           |
| 2. Gregory Fratis Sr. | 21. JD DuShane              | 40. Nathaniel Monahan     |
| 3. Backy Peratrovich  | 22. Natachan Sopow          | 41. Matt Heckman          |
| 4. Winona Beesing     | 23. Sasa Alilovic           | 42. Dennis Berkeley       |
| 5. Agatha Krukoff     | 24. Olga Alilovic           | 43. Dave Sacter           |
| 6. Sally Meralief     | 25. Igor Merk               | 44. Ma.Estela Hernandez   |
| 7. Ed Sanford         | 26. Julia Bovee             | 45. Michael Ljubich       |
| 8. Clinton Northway   | 27. Sabrina Cimerol         | 46. James Nielsen         |
| 9. Melissa Berger     | 28. Linnaea Schmid          | 47. Scott R Falzerene Sr. |
| 10. Raymond Majeski   | 29. Leonard C. Nielsen      | 48. Joe Ponzi             |
| 11. Jana Harshey      | 30. Marki Jackson           | 49. Vicki D'amico         |
| 12. Ian Workman       | 31. Kevin See               | 50. David A. Leuesque     |
| 13. Skye Workman      | 32. Pete Skaviach           | 51. Andrew Roberts        |
| 14. Michael Lecuse    | 33. Charlotte Sandol        | 52. Martina Kurzer        |
| 15. Tachi Sopow       | 34. Cody Sanchez            | 53. Greg Levens           |
| 16. Anna Upicksoun    | 35. Levi Sutton             | 54. Debra J. Robidou      |
| 17. Lois Burrece      | 36. Bella Letourneau        | 55. Micah Ginnay          |
| 18. Margaret Lekanoff | 37. Carron-Nicolier Liliane | 56. Elaine Calhaun        |
| 19. MWG Shipp         | 38. Buner Alex              | 57. Janie Webb            |



58. Mewte Cozzotta
59. Patricia A. Martin
60. Jamie Abbott
61. Aaron Ellingsen
62. Dolena Fox
63. Charles W. Bingham III
64. Treva Esparza
65. Havriet Beleal
66. Kerry Maclane
67. Duane Lindoff
68. Larry Edwards
69. Theron Parrish
70. Danielle Kidman
71. Keith Reaves
72. George House
73. Patrick L. Elisoff
74. Samantha Cox
75. Vanessa De La Torre
76. Nathan Williams
77. Josh Keller
78. Jackie Nordlinder
79. Patrick M. Foy
80. Jasper Moore
81. Rebecca Mork
82. Neil C. Mcfinnis
83. Sandra J. Kincheloe
84. Josh Sachsenmaier
85. Elton Johnson
86. Jason Kavalbuitz
87. Scott Falzerano Jr.
88. Cathy L. Hazel
89. Valerie D. Ozawa
90. Dave Bernhardt
91. Faith Lee
92. Ronald Ozawa
93. Joseph C. Wilson
94. Heather Powell
95. Kenyatta Bradley
96. George Bennett
97. Michael Smith
98. Kim Elliot
99. Albert W. Wilson
100. Harvey Kitka
101. Allen A. Belnk
102. Patrick Davis
103. Garrett Bauer
104. Sarah Bell
105. Patrick Mc Mahun
106. Katherine Howard
107. Sarah Scott
108. Nick Lindoff
109. Benjamin J. Minasato
110. Michael Baines
111. Rhonda Gould
112. Caroline S. Williams
113. Summer Davis
114. Mirabel Davis
115. Aaron Bean
116. Aaron Bean
117. Allreta Watson
118. Tristan Guevin
119. Galadriel Morales
120. Amy Stus
121. Jackie DeBell
122. Terri McGraw
123. James John Nielser Jr.
124. Mary B Palez
125. Melu J. Dannille
126. Scott Harris
127. Constance N. Mazon
128. Nels H. Lawson
129. Sam Petro
130. Patrick mH Benst
131. Natalie K. Howard
132. Jasha Folsom
133. Camille Ferguson
134. Ellen Little Field
135. Christi Stalkfleet
136. Ronald James
137. Jolene Rodriguez
138. Melina R Duiee
139. Boyl Dickerson
140. Kelly Key
141. Ryan G. Gauerf
142. Erica Mane Karices
143. Destiny Charles
144. Frank Jimmy
145. Catherine Wilson
146. Dale S. Williams
147. Chester Miyasato Jr.
148. Lester Widmark
149. John Barehek
150. Scott Iodl
151. Donald C. Didrickson
152. Johnny W Duncan Sr.
153. John S. dek
154. Sara Zephier
155. Jacob Mudd
156. Faye Adams Eaton
157. Gary Harrison
158. William Evanoff
159. Jennifer John
160. Donald Nickerson Jr.
161. William Brown
162. Peter Jack Jr.
163. Amanda D. Dunaway
164. Bruce Mitchell Jack
165. Carolyn Jack
166. Katherine J Abbontt - Jack
167. Johnnie L. Jack
168. Rain Bason
169. Raymon Beeson
170. Lindsay Evans
171. Charles WonmonBerg
172. Kristina Arnold
173. Conrad Lowanstein
174. Sean Compton
175. Ray Dennis
176. Kevin N. Taranoff
177. Alicia Svilar
178. Trevor Pruitt
179. Mike Creek
180. Tasha Felix
181. Jesse Ranke
182. Keith Gibson
183. Samuel Clark
184. Korbin Storms
185. Tristan Bradley
186. Dulena Lan
187. Kevin Beam
188. Justin Olbiyoh
189. Mary Moormann
190. Andrew Chapin
191. Cheryl Stromme
192. Marian Allen



- |                             |                               |                              |
|-----------------------------|-------------------------------|------------------------------|
| 193. Mary Parvis            | 238. Stacey Davis             | 283. Edwin Dumag             |
| 194. Randac Rodgers         | 239. Michael DesRosiers       | 284. Aujie Ashly             |
| 195. Ken Pfiester           | 240. Leah Sorenson            | 285. Carmelite Calico        |
| 196. Patricia Pfiester      | 241. Roxanne Bartlett         | 286. Nathan Cox              |
| 197. Hilda Foxglove         | 242. Cara Bartlett            | 287. Carl Erickson           |
| 198. Heather Garrison       | 243. Eileen Hunter            | 288. Eugene Solouyer         |
| 199. Jon A. Martin          | 244. Edward Karshekoff        | 289. Jimmy D. Auudey         |
| 200. Monica Ballestenz      | 245. Aaron W. McCluskey       | 290. Theresa Bell            |
| 201. Robson Hake            | 246. Kenneth N Hunter         | 291. James R. Blaney         |
| 202. Bob Love               | 247. Gordon L. Paul           | 292. Rick Krueger            |
| 203. Marilyn GiGuhl         | 248. Cynthia Gibson           | 293. Vamer S. Cemson         |
| 204. Maria Maikegard        | 249. Diane Wonnenberg         | 294. Maria Graves            |
| 205. Tripp Larose           | 250. Paulette Moreno          | 295. Kayl George             |
| 206. Terrell G Ctvally      | 251. John J. Roberts          | 296. Jerry L Caspersen       |
| 207. Melissa J Danville     | 252. Andy Lee                 | 297. Kristine Underwood      |
| 208. Randy Hulse            | 253. Kebin Paterson           | 298. Pete Nielson            |
| 209. Scott Enke             | 254. Gena Johnson             | 299. Toni Wrenn              |
| 210. Antonio Rosas          | 255. Mattias Hautala          | 300. Thelton Rear            |
| 211. Ted Armstrong          | 256. Lebi Harriman            | 301. Rochelle L. Parker      |
| 212. Philip Dequine         | 257. Krisanne Rice            | 302. Sarah Kunaknana-Ahyakak |
| 213. James Helsice          | 258. Shawn Sorerson           | 303. Jenny Vlasoff           |
| 214. Wesley Holloway        | 259. Mamie Clare              | 304. Trent Junken            |
| 215. Hartey Barger          | 260. Mark Verne               | 305. Clara Rear              |
| 216. Amanda Johnston        | 261. Kaw P. Wilman            | 306. Micah Maxell            |
| 217. Maureen O'Halloran     | 262. Carmen Davin             | 307. George Carcas           |
| 218. Johnny Sani            | 263. Joshua Houston           | 308. Michael Rabago          |
| 219. Jessica Fontenot       | 264. Hugh Burton              | 309. Daniel G. Rear          |
| 220. Joselito Vidad         | 265. Esther Johnson           | 310. Charles Jim             |
| 221. William L. Patrick     | 266. Chester Hulo             | 311. Timothy W. James Sr.    |
| 222. Herbert Didrickson Jr. | 267. Grace Katasse Larsen     | 312. Boya Ball               |
| 223. Marlene Saire          | 268. Carlene Larsen           | 313. Alicia Jack             |
| 224. Jerry W. Hall          | 269. Aaron Paret              | 314. Theresa Waldron         |
| 225. William Baker          | 270. Marie Lawson             | 315. Tamra Phillips          |
| 226. John McCrehin          | 271. Nathan B. Johnson        | 316. Tanoi Vuylsteke         |
| 227. Tina Guy               | 272. Casey hilde              | 317. Toby Wark               |
| 228. George J. Bennett Sr.  | 273. Charles Wheaton          | 318. Shawn Chandler          |
| 229. Jackie Corbett         | 274. Robert J Layton          | 319. Robyn Vown              |
| 230. Ron Guy                | 275. Mildred Jayton           | 320. Ryan Heaton             |
| 231. Matt Forlen            | 276. Alice J Zellkenber Smith | 321. Momer Mills             |
| 232. Sean deMello           | 277. Elizabeth Mosher         | 322. Renea Bentley           |
| 233. Daniel Manzanares      | 278. Michael M. Bune          | 323. Lana Williams           |
| 234. Emily Beanlien         | 279. Peter L. Coray           | 324. Christine R. Boyle      |
| 235. Gavan Gangle           | 280. Chris Walker             | 325. Karen Parker            |
| 236. Khan overcast          | 281. Raymond Ozawa            | 326. Bob Parker              |
| 237. Daniel Active          | 282. Celia Dumag              | 327. Zach Alderman           |





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|---------------------------------|---------------------------|----------------------------|
| 328. Ali Clayton                | 373. Diane Willard        | 418. Katy Rozier           |
| 329. Crystal Ketah              | 374. Drena McIntyre       | 419. Josephine M Johnson   |
| 330. Derek Daly                 | 375. Edward George        | 420. Lee Saunders          |
| 331. Robert R. Edenso Jr.       | 376. Shaun Guthrie        | 421. Katherine L. Johnson  |
| 332. Aaron D Wrenn              | 377. Kitty Wilson         | 422. Heather Meuret-Woody  |
| 333. Josh Stevens               | 378. Jeff Feldpausch      | 423. John Nielsen          |
| 334. Shirley Kendell            | 379. Leo Lolwin           | 424. Dave Salter           |
| 335. Bernice Nisbett            | 380. Martha Dayton        | 425. Charles Owen Miyasoto |
| 336. Roy J. Tansy Sr.           | 381. Dawn Nickoli         | 426. Delmer McIntyre       |
| 337. Francesca Stevens          | 382. Ted Sanford          | 427. Keneth Nielsen        |
| 338. Mary M. Ayunerak           | 383. Brian Sanford        | 428. Neil Campbell         |
| 339. Theresa Damian             | 384. James A. Nichulai    | 429. Robert Tice           |
| 340. Jack Stewart               | 385. Richard Brookman     | 430. Noriss S. Howard      |
| 341. Elizabeth Chikigak         | 386. Ben Lawrie           | 431. Gary Gouker           |
| 342. Caroline Murphy            | 387. George F. Jackson    | 432. Tom Gamble            |
| 343. Sean C. White              | 388. Christina Righter    | 433. Ray Friedlander       |
| 344. Rachel Moreno              | 389. Gilbert Knutson      | 434. Marsh Skeele          |
| 345. Heather Riggs              | 390. Roberts Kirkman      | 435. Robin Grewe           |
| 346. Jessica Gill               | 391. Dennis C. Allen      | 436. Kamishia Blease       |
| 347. Hilary D. Toyukak          | 392. Charles L. Braurard  | 437. Jeffrey G Moebus      |
| 348. Moses Toyukak Jr.          | 393. Calvin Carlson       | 438. Karren Upcraft        |
| 349. Brian Stephanoff           | 394. William Church       | 439. Leland McGate         |
| 350. Theresa E Fox              | 395. Terri McGuire-Gurule | 440. Tod Wright            |
| 351. Betty Magnuson             | 396. Donovan Gurple       | 441. Geraidmok Benson      |
| 352. Fred O. Olsen Jr.          | 397. Terry Perenovich     | 442. Gerry Hope            |
| 353. Jessika Beam               | 398. Mark M Howey         | 443. Natalie Brown         |
| 354. Carny Willard              | 399. Mark Bradley         | 444. Wilbar Brown          |
| 355. Steve Lambert              | 400. Alvin Rezek          | 445. Pat Sketlak           |
| 356. Ruth Stewart               | 401. Robert Noyer         | 446. Debe Brincefield      |
| 357. Josephine Hishon           | 402. Mark Danielson       | 447. Punlette Moreno       |
| 358. Sarah Williams             | 403. Pamela L Kristovica  | 448. Terry Charles         |
| 359. Selina Claggett            | 404. Trent J. Junker      | 449. Betty A. Baines       |
| 360. Clara Gray                 | 405. Charles S. Kultka    | 450. Leota z Bagby         |
| 361. Elva Amiden                | 406. Arnold W. Johnson    | 451. Doray Hatmaker Jr.    |
| 362. Loretta M. Parker          | 407. Brian Woody          | 452. Vicktoria Canul Dunne |
| 363. Michael Tinker             | 408. Cedar Maye           | 453. Chasady Didickson     |
| 364. Tisha Rochdi               | 409. Sylvia Falk          | 454. Nate Nesheir          |
| 365. Felicia Wassillie          | 410. Richard A. Nelson    | 455. Harriot Beleal        |
| 366. Mary King                  | 411. Edward G Peele Sr.   | 456. Janine Canul          |
| 367. James Thompson             | 412. Jim Way              | 457. Keturah Kinsman       |
| 368. Graehl Brooks              | 413. Edward Conway        | 458. Priscilla Peele       |
| 369. Patience Andersen Faulkner | 414. Mary Ferguson        | 459. Doreen Marics         |
| 370. Linda G. Robinson          | 415. Carl T. Dominicks    | 460. John Duncan Sr.       |
| 371. Teresa Hanson              | 416. Gene Bunton          | 461. Judy Woods            |
| 372. Catherine Reamey           | 417. Lyle Hilde           | 462. LaVerne Hutto         |

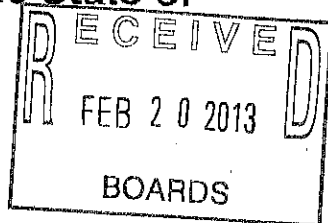


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|-------------------------------|-----------------------------|-----------------------------------|
| 463. Ashley Tinker            | 485. Eunice James           | 507. Zach West                    |
| 464. Jusin Notah              | 486. Bernard Kimkendall     | 508. Jeffrey Bell                 |
| 465. Francis Kakoon           | 487. Robin S. Klanott       | 509. Frederick Otilius Olsen, Jr. |
| 466. Mary Kakoone             | 488. Scott Brylinsky        | 510. Kaxy Smith                   |
| 467. Mary Wheeler             | 489. Matt Goff              | 511. Julie Cohorn                 |
| 468. Kathy Miller             | 490. Lori Peterson          | 512. Edward K. Thomas Jr.         |
| 469. Alaine Avery             | 491. James Bailey           | 513. Mike Escoffon                |
| 470. Joyie White              | 492. Alaina Avery           | 514. Kelly Trussell               |
| 471. Susan Renes              | 493. Steven Gabelein        | 515. William Yickey               |
| 472. Jack Zoyn                | 494. Marie E. Dimond        | 516. Sara Yockey                  |
| 473. Steven Gosuk Jr.         | 495. Russell James          | 517. Glenn Hamar                  |
| 474. Josephine S. Knapp       | 496. John Hammock           | 518. Paule Peterson               |
| 475. Audrey Rearden           | 497. Christopher Brewton    | 519. Richard J. Peterson          |
| 476. Gloria J Jenkins         | 498. Klaudia Leccese        | 520. Darl K. West                 |
| 477. Nj Wesson                | 499. George Burnstein       | 521. Elizabeth Borbridge          |
| 478. Sally M. Kookesh         | 500. Todd Heiningen         | 522. Jim Borbridge                |
| 479. Virginia R Woods         | 501. Rosita Worl            | 523. Alice M. Titell              |
| 480. Scott Saline             | 502. Raymond S. Nielsen Jr. | 524. Karen Lucas                  |
| 481. Mitchell Jikiyaklook     | 503. Jerry West             | 525. Irene N. Paul                |
| 482. Allakaket Tribal Council | 504. Dorothy Smith          | 526. Lawrene Brade Paul           |
| 483. Christine Littlefield    | 505. Jason Morin            |                                   |
| 484. Leonard Nielsen          | 506. Bonnie L. Hamar        |                                   |



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6 of 6

# Petition in Support of Adding Pacific Herring to the State of Alaska's Forage Fish Management Plan



To the Alaska State Board of Fisheries through Chairman Johnstone,

I support the regulatory change, Board of Fisheries proposal 243, which would add Pacific herring (*Clupea pallasii*) to the State of Alaska's Forage Fish Management Plan. The existing administrative code (5AAC 39.212) fails to include all species of forage fish indigenous to the waters of Alaska. The board recognizes that abundant populations of forage fish are crucial to sustaining healthy populations of commercially important salmon, groundfish, halibut, and shellfish species. Herring are an ecological keystone prey species for many finfish populations, marine mammals, and terrestrial and marine birds. Please add Pacific herring to the State of Alaska's Forage Fish Management Plan. Failure to do so will compromise the existence of herring stocks throughout the State of Alaska.

Print Name: William F. Brown Date: 2/20/13

Address: PO Box 89 Eka AK 99578

Phone: 5365128

Signature: *William F. Brown*



**KENAI RIVER SPORTFISHING**  
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Ron's Alaska Lodge - Retired

Gary Turner  
Director, Kenai Peninsula College

Jeremy Wallis  
District Manager, The Home Depot

March 1, 2013

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

Attn: Monica Wellard

Re: Proposal Withdrawal

Dear Monica

KRSA officially requests that our proposal 225 - Policy for  
Implementation of Permit Stacking 5 AAC 39.2xx be withdrawn from  
the agenda of the statewide board of fisheries finfish meeting in March  
2013.

Regards,

Ricky Gease  
Executive Director

*Dedicated to preserving the greatest sportfishing river in the world, the Kenai.*

224 Kenai Avenue, Suite 102 • Soldotna, Alaska 99669

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