

On-Time Public Comment List
Statewide Dungeness Crab, Shrimp, Misc. Shellfish (except
Southeast and Yakutat) and Supplemental Issues
March 17–20, 2015

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On-Time Public Comment List
Statewide Dungeness Crab, Shrimp, Misc. Shellfish (except
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On-Time Public Comment List
Statewide Dungeness Crab, Shrimp, Misc. Shellfish (except
Southeast and Yakutat) and Supplemental Issues
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The following Public Comments and Record Copies were received 2014 Work Session and the 2015 Southeast and Yakutat Finfish Meeting regarding Proposal 276

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Submitted By
Allen Tompkins
Submitted On
2/25/2015 12:39:52 PM
Affiliation

I would like to add my support for PROPOSAL 244 (5 AAC 77.518 personal use clam fishery), establishing personal use bag and possession limits for razor clams in West Cook Inlet. I have enjoyed this fishery for several years and would like to see the razor clam population maintained for the enjoyment of future generations. In recent years, I have noted a significant increase in harvest pressure, both private and charter. I have also noticed a reduction in clam size and population. With the February 24, 2015 emergency order closing East Cook Inlet clam harvest, it is imperative that a bag and possession limit be placed on West Cook Inlet to protect the resource. A bag limit even more aggressive than proposed, such as 25 clams per person, allows adequate harvest per family while also taking necessary steps to prevent radical population decline as seen in East Cook Inlet. Thank you for your consideration on this important issue.



Submitted By
Katherine Covey
Submitted On
1/29/2015 10:37:24 AM
Affiliation

Phone
9073981773

Email
katco907@me.com

Address
po box 39521
16699 easy street
niniichik, Alaska 99639

I support proposal 243, submitted by Jim St. Peter. I am a resident of the Kenai Peninsula and I am deeply concerned about the decline of the razor clam population in East Cook Inlet. I strongly encourage the Board of Fisheries to change all applicable regulations in the Alaska Administrative Code (AAC) to close the East Cook Inlet razor clam fishery to ALL harvest until such time that this resource can recover. The current harvest limit listed in the AAC is inappropriate and should be revised to protect this important resource. If at any time harvest becomes viable, the ADF&G may issue an emergency order to open the fishery.



Submitted By
Birch Yuknis
Submitted On
2/25/2015 10:11:05 AM
Affiliation
Concerned Alaska Resident

Phone
907-317-9591
Email
byuknis@aol.com
Address
5035 N Flying Circus Circle
Wasilla, Alaska 99654

Hello Board Of Fish,

There are several proposals for the upcoming BOF meeting that I would like to voice my opinion on. These are all proposals for the Staewide Dungeness Crab, Shrimp, and Misc. Shellfish meeting for March 17-20 that I will be unable to attend so I am presenting my online comments.

First is Proposal 251 - Amending the Boundry for the Commercial fishery in PWS between area 2 and 3. The commercial pot fishermen (fisherpeople sounds so awkward) get to shrimp that area that ADF&G wants to already. Amedning the boundry just makes it easier for ADF&G papwerwork. It aligns the boundry for the statistical areas with the three shrimp pot fishery zones . In area 3 ADF&G had to close one of the statistical areas the last time the commercial pot fishermen were fishing. I am opposed to amending this boundry for I fear that the commercial harvest then in area 3 would concentrate more towards this boundry and over harvest could occur near this boundry. ADF&G Fishery management Report No. 12-05 from 2011 even states that Spot shrimp are "remarkably sedentary," making overfishng a small area devastating. Therefore I am opposed to proposal 251.

Proposal 254 - Raising the staistical area cap from 25% to 50%. As previously stated spot shrimp are remarkably sedentary. Increasing the cap from 25%-50% makes it more likely to overfish a staistical area. ADF&G does not have a good track record when it comes to managing the commercial pot fishery in PWS. Their own study by Trowbridge following the Exxon Valdez Oil Spill in 1992 concluded that the PWS spot shrimp likely declined as a result of overfishing. Therefore I am opposed to this proposal.

Proposal 258-260 Closing the commercial shrimp pot fishery in PWS. As previously stated ADF&G has not demonstrated they can effictively manage a commercial pot fishery in PWS.(my notes from proposal 254) The most current data from ADF&G for 2014 states there were over 3100 noncommercial household permits issued vs 32 commercial vessels that participated. Remember the noncomemrcial is by household. So that would be multiple people per permit. How many more residents does the noncommercial fishery provide for versus the commercial fishery??? Even at a conservative number of three per household and three per commercial vessel that is a 100 fold difference. The number of noncommercial permits has leveled off over the last several years(2010-2014) at around 3100. I would rather see the Total Allowable Harvest(TAH) go to the noncomemrcial fishery than the commercial fishery. By eliminating the commercial fishery the TAH for noncommercial would go from the current 60% allocation to 100%. This is a fishery that is close to the population center of Anchorage. This fishery provides for much enjoyment for many people vs a few commercial fisherman. I participate in the noncommercial fishery. I have a household permit but over the course of the summer I take many friends and relatives on my vessel and share the bounty of PWS shrimp with them. So a household permit really benefits more than one household. Therefore I supposrt all three of these proposals, 258-260.

Thank you for your time,

Birch Yuknis



IN REPLY REFER TO:

United States Department of the Interior

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



MAR 02 2015

FWS/OSM 15010.GP

Mr. Tom Kluberton, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Kluberton:

The Alaska Board of Fisheries will consider 45 proposals, among other issues, at its Statewide Dungeness Crab, Shrimp, Miscellaneous Shellfish (except Southeast and Yakutat) and Supplemental Issues meeting beginning March 17, 2015.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed the proposals and have developed the enclosed preliminary comments for proposals which may have an effect on Federal subsistence users and fisheries. We may wish to comment on other proposals if issues arise during the meeting which may have an effect on Federal subsistence users and fisheries.

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

Sincerely,

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

Enclosure



Chairman Kluberton

1

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



**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
for the
STATEWIDE DUNGENESS CRAB, SHRIMP, MISCELLANEOUS
SHELLFISH, AND SUPPLMENTAL ISSUES**

**State of Alaska
Board of Fisheries Meeting
March 17 – 20, 2015
Anchorage, Alaska**



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Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation.

Proposal 271 (Formally ACR 6) would require the operation of four-inch mesh subsistence gillnets to be operated only as set gillnets in the Kuskokwim River during times of king salmon conservation.

Current State Regulation:

5 AAC 07.365 Kuskokwim River Salmon Management Plan. (d)(2)(A)

Current Federal Regulation:

§100.27 Subsistence taking of fish. (e)(4)

(ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: No. The Federal inseason manager for the waters of Kuskokwim River under Federal subsistence fisheries jurisdiction has the delegated authority to restrict the use of four-inch mesh gillnets to their operation only as a fixed set net. This restriction was enacted for much of the 2014 season a Chinook Salmon conservation tool.

Federal position/recommended action: Support. Federal Subsistence Management Program staff support conservation of the Kuskokwim River Chinook Salmon resources through utilizing management tools such as fixed gillnets with small mesh. Adoption of



this proposal will reduce regulatory complexity and will add a conservation tool State of Alaska fisheries managers may use during times of Chinook Salmon conservation.

Proposal 272 (Modified ACR 8) requests providing the Commissioner of the Alaska Department of Fish and Game emergency order authority to restrict gill net length and other allowable gear during times necessary to conserve king salmon in the Kuskokwim River drainage.

The proposal requests allowing the modification of gillnet length, establishes a four-inch gillnet mesh size restriction, requires live king salmon to be released immediately unharmed from beach seines and dip nets.

Current State Regulation:

5 AAC 01.270. Legal gear and gear specifications and operation. (n)(1-4)

Current Federal Regulation:

§100.27 Subsistence taking of fish. (e)(4)

(ii) For the Kuskokwim area, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: No. The Federal inseason manager for the waters of Kuskokwim River under Federal subsistence fisheries jurisdiction has the delegated authority to restrict the length gillnet used, gillnet mesh size, how gillnets are fished, and to require release of Chinook Salmon unharmed from dip nets, fish wheels, and beach seines. Federal fisheries managers enacted several of these restrictions for subsistence fisheries openings during the 2014 season as Chinook Salmon conservation tools.

Federal position/recommended action: Support. Federal Subsistence Management Program staff support conservation of the Kuskokwim River Chinook Salmon resources through utilizing management tools such as restricting gillnet length, adjust maximum gillnet mesh size restrictions, prescribing how gillnets are fished, and requiring immediate release of Chinook Salmon from selective gear types (e.g. fishwheels, and dip nets). Adoption of this proposal will reduce regulatory complexity and will add a conservation tool State of Alaska fisheries managers may use during times of Chinook Salmon conservation.



Proposal 273 (ACR 9) requests allowing subsistence fishing with drift gillnet after July 15 in the upper section of the Yukon Subdistrict 4-A for the harvest of summer chum salmon.

Current State Regulations:

5 AAC 01.220 Lawful gear and gear specifications (e)(1).

Current Federal Regulations:

§100.27 Subsistence taking of fish. (e)(3)(xv)

(A) In Subdistrict 4A upstream from the mouth of Stink Creek, you may take Chinook salmon by drift gillnets less than 150 feet in length from June 10 through July 14, and chum salmon by drift gillnets after August 2;

(B) In Subdistrict 4A downstream from the mouth of Stink Creek, you may take Chinook salmon by drift gillnets less than 150 feet in length from June 10 through July 14;

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. The State and Federal inseason managers for the waters of Yukon River have the delegated authority (through Emergency Order or Fisheries Special Action respectively) to allow use of drift gillnets in Subdistrict 4A based upon abundance levels of salmon returns. Both State and Federal inseason fisheries managers already allow drift gillnetting in Subdistrict 4A after July 15 during years when the majority of Chinook salmon have passed this area when Chum Salmon remain present.

Adoption of this proposal could result in additional opportunity to harvest Chum Salmon by subsistence users as specified in the proposal. Current regulations for this area were established to avoid the harvest of summer Chum Salmon. With the recent down turn in Chinook Salmon abundance in the Yukon River drainage, managers have modified regulations inseason through Emergency Order and Special Action authorities. These inseason modifications were made as a way to mitigate loss of opportunity to harvest Chinook Salmon by supplementing opportunity to target summer Chum Salmon when chum are not fully utilized.

Federal position/recommended action: Support with modification. The Federal Subsistence Management Program supports this proposal with modification to increase management flexibility. The recommended modifications would remove reference to salmon species and closure dates because managers have the authority modify time, area, gear type, and how gear is fished to target or avoid Chinook and Chum Salmon. The recommend modification follows.



5 AAC 01.220 (e)(1) In Subdistrict 4-A upstream from the mouth of Stink Creek, [KING] **salmon** may be taken by drift gillnets **beginning** [FROM] June 10. [THROUGH JULY 14, AND CHUM SALMON MAY BE TAKEN BY DRIFT GILLNETS AFTER AUGUST 2.]

Adoption of this proposal with the offered modification will allow subsistence fishermen opportunity for the use of drift gillnet gear to harvest Chinook and Chum Salmon throughout the season when abundance of all species are sufficient. Adoption of this proposal as written or with the recommended modification will require the Federal subsistence fisheries manager to issue a Special Action to temporarily change Federal regulations (effective for a maximum of 60 days) to allow fishing with drift gillnets in the area between July 15 and August 3. A proposal would need to be submitted to the Federal Subsistence Board to modify existing Federal subsistence fishing regulations to reflect alignment with this State of Alaska regulation change.

Proposal 274 (ACR 10) requests allowance of subsistence fish wheel fishermen in the Yukon Area to retain king salmon when some harvest is justified based upon inseason run assessment.

Current State Regulation:

5 AAC 01.220 (n)(2)

Current Federal Regulation:

§100.27 Subsistence taking of fish. (e)(3)

(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action

(xiii) You may take salmon only by gillnet, beach seine, fish wheel, or rod and reel, subject to the restrictions set forth in this section.

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Possibly. If adopted, Federal subsistence fishermen using fish wheels will be allowed to retain incidentally caught



Chinook Salmon during times of low abundance when a low number of Chinook Salmon are identified as harvestable surplus.

If adopted, Federally qualified subsistence users and fisheries could be impacted by making Chum Salmon fishing even more cautious if managers have to consider additional fishwheel harvest.

If adopted, consideration should be given to the level of burden required of fishwheel operators to “man” their wheels when targeting summer Chum Salmon in order to release all incidental king salmon during these times of conservation.

Federal position/recommended action: Neutral. Adoption of this proposal appears to be an allocative decision because the Yukon River Chinook Salmon stocks are already fully allocated and if additional surplus of Chinook Salmon becomes available the user structure is already more than capable of harvesting any foreseeable surplus. Management of the Yukon Drainage fisheries during recent very weak Chinook Salmon runs has focused on finding ways to more effectively harvest other species of salmon while protecting Chinook Salmon. It is recognized that some Chinook Salmon are harvested incidentally during Chum Salmon directed gillnet fishing periods. Managers will need to further factor fish wheel Chinook Salmon harvest into their inseason decision making process when balancing between the opportunity to harvest surplus summer Chum Salmon with an acceptable level of incidental Chinook Salmon mortality.

Sections of the river have varying proportions of Chinook and Chum salmon running together. In some areas Chum Salmon vastly outnumber Chinook Salmon in relative abundance while in other places like Subdistrict 5-D, Chinook Salmon may be the dominant species in abundance. Therefore, fishwheel exploitation rates between species will be variable. If allowed in some locations, fishwheel may actually target Chinook Salmon even during times of conservation.

Proposal 278 (ACR 8) requests allowing subsistence fishermen to operate fish wheels without a live box during times necessary to conserve king salmon in the Kuskokwim River drainage. The proposed regulatory language also requests operation of fish wheels without live boxes would require the wheel be equipped with a chute that returns fish captured to the water alive and that the wheel be closely attended to allow the return of all king salmon caught.

Current State Regulation:

5 AAC 01.270(n)(2) Lawful gear and gear specifications and operation.

Current Federal Regulation:

§100.27 Subsistence taking of fish. (e)(3)



(ii) For the Yukon River drainage, Federal subsistence fishing schedules, openings, closings, and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action

(xiii) You may take salmon only by gillnet, beach seine, fish wheel, or rod and reel, subject to the restrictions set forth in this section.

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. Adoption of this proposal will allow Federally qualified subsistence fishermen operating fish wheels without live boxes the opportunity to harvest fish other than Chinook Salmon during times of low of Chinook Salmon returns under State of Alaska regulations

Federal position/recommended action: Neutral. The Federal inseason manager for the waters of Kuskokwim River under Federal subsistence fisheries jurisdiction has the delegated authority to require monitoring of fish wheels, installation of return chutes, and restrict the length gillnet used, gillnet mesh size, and to require release of Chinook Salmon unharmed from dip nets, fish wheels, and beach seines. Federal fisheries managers enacted several of these restrictions for subsistence fisheries openings during the 2014 season as Chinook salmon conservation tools.

Adoption of this proposal will reduce regulatory complexity and will add a conservation tool State of Alaska fisheries managers may use during times of Chinook Salmon conservation. Adoption of this proposal could be considered a burden to subsistence users because the proposed regulations require operators of fish wheels without live boxes to closely attend the fish wheel to release Chinook Salmon while in operation. Additionally, if this proposal is adopted, subsistence users will have the financial burden of purchasing materials to modify their fish wheels.



CDFU COMMENTS

February 28, 2015

ATTN: BOF COMMENTS

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

RE: 2015 Statewide Dungeness Crab, Shrimp and Misc. Shellfish meeting

Dear Chairman Kluberton and Members of the Board;

Cordova District Fishermen United (CDFU) is a non-profit membership organization representing over 300 family fishermen who participate in the commercial fisheries in the Prince William Sound and Copper River region. It is our mission is to preserve, promote and perpetuate the commercial fishing industry in Area E in the state of Alaska; to further promote safety at sea, legislation, conservation, management and the general welfare for the mutual benefit of all our members.

CDFU believes that the vibrant commercial fisheries in Alaska are an integral part of the network of our coastal communities and vitally important to the Alaskan economy. Healthy, robust and well-managed commercial fisheries provide the conduit for many populations' access to nutritious fishery resources. In fact, we wish to illustrate that the majority of the commercially caught spot shrimp in PWS are sold and consumed in the State of Alaska by the many residents that do not otherwise have the ability to access this resource.

Thank you for the opportunity to comment on Proposals as part of the 2015 Statewide Dungeness Crab, Shrimp and Misc. Shellfish meeting in Anchorage, Alaska. Attached, you will find written comments prepared by Cordova District Fishermen United on behalf of the Board of Directors and members of the commercial fishing fleet in Prince William Sound and Copper River.

We trust that the points we raise in these comments provide you with sufficient information to aid your final determinations during this regulatory cycle. Thank you for your careful consideration and your commitment to serve on the Board of Fisheries.

Sincerely

Alexis Cooper, Executive Director
Cordova District Fishermen United
Director@cdfu.org



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
PWS	Noncommercial Shrimp		
245	Change harvest allocation guidelines under the PWS noncommercial shrimp fishery management plan. <i>Mike Crawford</i>	Oppose	CDFU supports maintaining the current management plan which allocates shrimp resources to participants in both noncommercial and commercial fisheries. The current GHM structure maximizes the ability for all Alaskans to access this resource.
246	Change harvest allocation guidelines under the PWS noncommercial shrimp fishery management plan. <i>Joe Haines</i>	Oppose	We support the opportunity for all Alaskans who need or wish to experience the joys of capturing food for themselves. We must also support the majority of other Alaskans' ability to have access through commercial harvests.
PWS	Commercial Shrimp		
250	Clarify that a person may only register one vessel each season for the Registration Area E shrimp pot fishery. <i>ADF&G</i>	Support	CDFU supports ADFG commercial fisheries management and their efforts to clarify regulations and improve their ability to sustainably manage the PWS spot shrimp resource.
251	Amend the boundary between pot fishing areas in Registration Area E. <i>ADF&G</i>	Support	
252	Add additional waters closed to the taking of shrimp with trawl gear and correct coordinates within the closed waters section. <i>ADF&G</i>	Support	
253	Change Registration Area E shrimp pot commercial fishery designation from exclusive to super-exclusive area and season closing date from September 15 - August 1. <i>Mike Crawford</i>	Oppose	Changing to a super exclusive registration and limiting opportunity is unwarranted and unnecessarily limits participation in multiple fisheries.
257	Amend the reporting requirements for the commercial shrimp pot fishery in Registration Area E.	Support	We support management intent to capture timely and accurate fishery information while also improving participants' ability to comply.



CDFU COMMENTS

Cordova District Fishermen United			
#	Proposal	Position	Comments
257	ADF&G		
258	Close the commercial shrimp pot fishery in PWS. <i>Mike Crawford</i>	Oppose	<p>The PWS commercial spot shrimp fishery has a long history until the early 1990's shortly after the EVOS. After a long period of closure, it was ADF&G that submitted the proposal to reopen the commercial fishery. This decision was based on ADF&G staff stock assessments indicating a substantial increase in PWS biomass.</p> <p>It is also worth noting, that the PWS commercial spot shrimp fishery is an open-access fishery that enables young Alaskan fishermen an opportunity to enter a small family business.</p>
259	Close the commercial shrimp fishery in PWS. <i>Jeff Benkert</i>	Oppose	
260	Close the commercial shrimp fishery in PWS. <i>Wynn Gilbertson</i>	Oppose	



Submitted By
Debbie Cary
Submitted On
2/21/2015 4:56:40 PM
Affiliation
Inlet View Restaurant

I support proposal 243, submitted by Jim St. Peter. I am a resident of the Kenai Peninsula and I am deeply concerned about the decline of the razor clam population in East Cook Inlet. I strongly encourage the Board of Fisheries to change all applicable regulations in the Alaska Administrative Code (AAC) to close the East Cook Inlet razor clam fishery to ALL harvest until such time that this resource can recover. The current harvest limit listed in the AAC is inappropriate and should be revised to protect this important resource. If at any time harvest becomes viable, the ADF&G may issue an emergency order to open the fishery.

ADF&G need to be proactive to this natural resource. As a long time resident of the Kenai Peninsula we have experienced the decline of a natural resource due to over harvesting.



Submitted By
Eric Schaetzle
Submitted On
3/2/2015 2:50:24 PM
Affiliation

Phone
(907) 479-1286

Email
cheirios@gmail.com

Address
4393 Kallenberg Rd.
Fairbanks, Alaska 99709

I support proposal 244. We need to anticipate the effect of current and growing harvest pressures on the West Cook Inlet clam populations. It is already known that harvesting and other environmental pressures decrease clam populations. Before we face a similar situation in West Cook Inlet as we have seen on East Cook Inlet, place a harvest limit there. Protection shouldn't always be a response to threats, but anticipate them as well to avoid population crashes as we have seen elsewhere.

Implementing a baseline harvest limit for razor clams in West Cook Inlet will help to protect and preserve this population until such time that more biological information can be collected. I strongly encourage the Board of Fisheries to implement a baseline harvest limit of 60 clams per day in West Cook Inlet.

Thank you for closing East Cook Inlet to clamming this year.



Submitted By
Jim St Peter
Submitted On
2/22/2015 7:02:35 PM
Affiliation

Phone
907-398-1722
Email
akjim46@yahoo.com

Address
P.O. Box 39723
Ninilchik, Alaska 99639-0723

I support proposal 244, submitted by Ivan Encelewski. I am a resident of the Kenai Peninsula and I am deeply concerned about intense harvest pressure in West Cook Inlet. There are currently no harvest limits in West Cook Inlet. This area has become very popular for recreational razor clam digging, as more people are accessing the area by private/chartered boat /plane than in the past. Reduced harvest limits and an emergency order closing Ninilchik Beach in East Cook Inlet may result in even more harvest in West Cook Inlet. The ADF&G does not currently conduct regular monitoring of the West Cook Inlet razor clam population. Comprehensive data are lacking for growth, abundance, and fecundity. There is not enough information available to determine whether the West Cook Inlet razor clam population can sustain unlimited harvest. Implementing a baseline harvest limit for razor clams in West Cook Inlet will help to protect and preserve this highly exploited, unstudied population. In order to protect this resource until such time that more biological information can be collected, I strongly encourage the Board of Fisheries to implement a baseline harvest. However I believe 120 clams per day with 120 in possession be the limit. It's a 30 mile boat ride or a 40 mile flight from Ninilchik to access the west side clam beds. For most people it's one trip per year to get their year's supply. I've dug there since 1979 and have not seen significant decline.



Submitted By
Jim St Peter
Submitted On
2/22/2015 6:29:39 PM
Affiliation

Phone
907-398-1722
Email
akjim46@yahoo.com

Address
P.O. Box 39723
Ninilchik, Alaska 99639-0723

I'm Jim St Peter proposal 243 is mine. I'm a Kenai Peninsula resident living in Ninilchik. I am deeply concerned about the decline of the razor clam population in East Cook Inlet. I strongly encourage the Board of Fisheries to change all applicable regulations in the Alaska Administrative Code (AAC) to close the East Cook Inlet razor clam fishery to All harvest until such time that this resource can recover. The current harvest limit listed in the AAC is inappropriate and should be revised to protect this important resource. If at any time harvest becomes viable, the ADF&G may issue an emergency order to open the fishery to 15 clams per day per digger.

ADF&G will disclose their studies on Razor clams for the years 1988 to 2014 showing the decline which is significant.



Submitted By
joseph simpson
Submitted On
3/2/2015 10:04:36 AM
Affiliation

I support proposal 244 to put a limit of 60 razor clams per day /120 in possession in westcook inlet this resource needs to be protected from over harvest there is a lot of pressure on these beaches already and will increase with the eastside closure



Submitted By
Keith Forsgren
Submitted On
2/24/2015 6:48:41 PM
Affiliation

Phone
9073736054

Email
keith.forsgren@gmail.com

Address
PO Box 870529
Wasilla, Alaska 99687

I would like to add my support for PROPOSAL 244 (5 AAC 77.518 personal use clam fishery), establishing personal use bag and possession limits for razor clams in West Cook Inlet. I have enjoyed this fishery for several years and would like to see the razor clam population maintained for the enjoyment of future generations. In recent years, I have noted a significant increase in harvest pressure, both private and charter. I have also noticed a reduction in clam size and population. With the February 24, 2015 emergency order closing East Cook Inlet clam harvest, it is imperative that a bag and possession limit be placed on West Cook Inlet to protect the resource. A bag limit such as 60 clams per person, allows adequate harvest per family while also taking necessary steps to prevent radical population decline as seen in East Cook Inlet. Thank you for your consideration on this important issue.



Submitted By
Elmer Schaetzle
Submitted On
2/21/2015 5:17:31 PM
Affiliation
Non-affiliated/Non-partisan

To Whom It May Concern:

Subject: Proposals 243 and 244

The time has come to face the facts; we have impacted the Cook Inlet environment. We need to close down razor clam harvesting on the eastside of Cook Inlet to start with. This should be followed by studying Cook Inlet waters. We have oil and gas platforms in Cook Inlet discharging waste, granted it is small, but these discharges accumulate over time. We have several municipalities partially treating their waste and then discharging it into Cook Inlet at high tide. This has been going on for decades. Acidification of the ocean waters keeps increasing, and this cannot be good for organisms such as razor clams, etc. We need more studies of Cook Inlet and decreased pollution of it.

Without fishing and clamming in Ninilchik, which our local economy relies on, we will become forgotten backwater instead of the destination we once were. A local realtor said, "The only thing selling in the Ninilchik area are 'For Sale' signs."

For the time being, close razor clamming until more studies have been conducted to give the Board better information to develop a plan for sustainability of our resources. We can do better than California, Oregon and Washington; we are Alaskans!



Submitted By
Michael Garcia
Submitted On
3/3/2015 8:43:53 AM
Affiliation

Phone
907-252-4272
Email
mike@mgsfa.com

Address
35555 Kenai Spur Hwy #341
Soldotna, Alaska 99669

I would like to comment on **PROPOSAL 244 - 5 AAC 77.518. Personal use clam fishery**. I do not think that a daily limit of 60 clams is needed on the west side of Cook Inlet. As of this time, the harvest on the west side is ,mainly limited to airplane and boat traffic, thus keeping the harvest relatively low. If a limit of 60 clams is instituted, I believe it could adversely affect commercial operators providing access to west side beaches. Even though the numbers of commercial operators are low, putting even more pressure on available clientele after the hits they are taking with the catch share plan before a scientific survey of clam populartions on the west side seems onerous.

Thank you

Mike Garcia



Submitted By
Mike Sullivan
Submitted On
3/2/2015 1:47:32 PM
Affiliation
Retired

Re: Shrimp Proposals 245-260

I'm a long time Anchorage resident who enjoys eating shrimp harvested from nearby Prince William Sound.

I do not support any new restrictions on the commercial harvest of shrimp as purchasing shrimp from a commercial fisherman is my only access to this resources. Allowing an ongoing robust commercial shrimp fishery is important to me and my friends who do not have the gear or skills to catch our own.

Please continue to manage the shrimp fishery so the product is available to all Alaskans not just those with expensive boats and gear.



Submitted By
Monica Lewis+
Submitted On
3/3/2015 2:15:13 PM
Affiliation

My husband and I purchase from 50 to 75 pounds of Prince William Sound shrimp each year from a commercial fisherman at the Anchorage Spenard Farmers' Market. It is the only way we have of obtaining this precious seafood. We share the shrimp not only with our Alaskan family and friends, but also with our family and friends outside. We do not purchase shrimp which is harvested in other countries.

Each year my husband spends around \$1,000.00 on salmon and halibut charters. There or no shrimp charters available. The only way we have of obtaining Alaskan shrimp is from a commercial fisherman.

We strongly believe that the shrimp fishery should be managed in a way that we will have continued access to a steady supply for ourselves as well as all Alaskans. Please strengthen the shrimp commercial fishery.

Sincerely,

Quinn H. Vaterlaus & Monica Lewis



Submitted By
Nicky Szarzi
Submitted On
3/2/2015 10:12:56 PM
Affiliation

Dear Board of Fisheries members,

I OPPOSE proposals 240, 241, 242 and 243, that would reduce or eliminate the sport and personal use take of Eastside Cook Inlet razor clams.

I believe the proposals to reduce or close the fishery are unwarranted and will unnecessarily deprive the public of the opportunity to harvest clams when abundance increases. Before I retired in 2011, most of my career as an ADFG sport fisheries biologist was spent studying the Eastern razor clam population, first as a graduate student, and then as the Lower Cook Inlet Sport Fish Management Biologist out of Homer. Razor clam studies since 1965 have documented that abundance fluctuates primarily because large new razor clam year-classes occur every three to five years rather than every year. Locations where concentrations of clams occur also change over time with the shifting substrate, changing freshwater influx and storm events.

The razor clam bag limit of 60 clams and the various possession limits, in place for over 50 years, have coincided with sustained populations and sustainable harvests of razor clams. Harvest rates for 80 mm and larger clams are conservative and have been below 10 percent except, periodically, at Ninilchik. ADFG monitors the population and has responded with restrictions, for the first time in the history of the fishery, based on their indices. The proposals to reduce the harvest razor clams by regulation would result in lost opportunity as new large year classes grow to a size that is more easily harvested.

As someone who loves to eat, as well as study, razor clams, I will sorely miss them on my plate, in my freezer and in jars on my shelves this year with the emergency closure of the fishery. Please let the department address the apparent changes in the razor clam fishery with their EO authority and leave the regulatory bag limit at 60 and possession limit at 120. Don't deprive me and my fellow harvesters of a reasonable daily bag limit of 60 clams that has provided sustainable harvests over so many years. If long-term razor clam population dynamics are shifting, I'm confident the department will respond with science-based management recommendations.

Thank you for your service to Alaskan resources and their users.

Sincerely,

Nicky Szarzi



Fm: Harlan Bailey

1061 Palm Ave

Martinez CA 94553

koggiung@hotmail.com (925) 228 6365

To: ADF&G Boards Support Section

PO box 115526

Juneau AK 99811

RE: Proposal 275

ACR concerning set net site in Kvichak

cover sheet and
one page

(907) 465 - 6094



Harlan P Bailey
1061 Palm Ave
Martinez CA 94553

ADF&G Boards Support Section
PO Box 115526
Juneau AK 99811-5526

RE: Proposal 275

I have fished set net on or near the beach at Graveyard Pt. since 1971. I have personally seen Dickie Armstrong and his sons fish on the beach sites in question since the early 1980's. Now I am seeing his grandchildren fish there.

This is an extended family of local residents. If their set net sites are denied to them, more than one Dillingham family will suffer financial hardship.

The movement of the district line does not seem to be related to either landscape or water features, the distance is minimal, so it seems rather arbitrary.

These are your watershed residents. They do not have the option of working for WalMart. Please help them.

Harlan Bailey, Kvichak Set Net Assoc, member, board of directors

A handwritten signature in black ink, appearing to read "Harlan P Bailey".



BATTLE RIVER WILDERNESS RETI KATMAI NATIONAL PARK & PRESERVE

PC 18
1 of 1

WILDERNESS FLOAT FISHING

BROWN BEAR PHOTOGRAPHY

February 23, 2015

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

Re: Proposal #277 - Proposal for optimum escapement goals for Bristol Bay Sockeye salmon.

To Whom It May Concern:

My name is Tim Conway and I operate a small business on Battle River in Katmai National Park. Our business is totally dependent upon the annual run of Sockeye Salmon which begins with their arrival in late July and concludes at the end of their spawning cycle in late September.

Over the past 30 seasons, I have experienced the ebb and flow of the Sockeye Salmon runs on the Battle River as I spend several hours each day traversing the it's 2 1/2 miles with sightseers, fishermen and Brown Bear photographers. Many of these guests return each year to enjoy the complete transformation of this barren wilderness environment with the arrival of the Sockeye Salmon to spawn.

For years, the escapement of Sockeye Salmon in the Alagnak watershed was a non-issue. Healthy runs were the norm with minor fluctuations from year to year that had a minimal impact on the subspecies dependent upon the runs for survival. That all came to an abrupt halt in 2012!

During that season and 2013, the Battle River sockeye run was 10-15% of normal. This was devastating to the sport fishery and Brown Bear photography. Our business lost several long term clients because they were only seeing 6 bears on a river float whereas in previous seasons they would see 25 to 35. Last season (2014), the Sockeye run improved slightly to about 30% of normal with a slight increase in bear numbers too - however, not even close to sustainable numbers for the natural environment.

The Alagnak watershed needs pre-2012 Sockeye salmon escapement quotas for the northern Katmai wilderness to survive - anything less will severely impact all the natural resources including the fresh water fish, wildlife and bird species that draw visitors from all over the world to this great place. PLEASE IMMEDIATELY REINSTITUTE MAXIMUM ESCAPEMENT QUOTAS FOR BRISTOL BAY SOCKEYE SALMON.

Thank you,

A handwritten signature in black ink that reads "Tim Conway". The signature is written in a cursive, flowing style.

Tim Conway

2811 Kadema Drive
Sacramento, CA 95864 email: timjconway@msn.com

Telephone: (916) 996-4532
Fax: (916) 922-2906

**Response to Suggested Proposal 275 and ACR 11
Smith/Ten Kley**



PC 19
1 of 4

Date: 1 March 2015

To: Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094
Email: dfg.bof.comments@alaska.gov

From: L. Tiel Smith, Benjamin Smith, Alec Smith, Erin Smith
Silke Smith, Lyle Smith, Niel Smith, Kaleb Smith
Reid Ten Kley, Eike Ten Kley

We are responding to ACR 11 and its accompanying suggested Proposal 275 regarding the change to the Naknek-Kvichak north-eastern boundary line at Graveyard Point, which includes two set-net locations. We are the owners of the neighboring net locations.

Background

Family history as shared by the Armstrong and Smith families is that back in the mid-1950's, Dick Armstrong obtained his net location on the east side of the Kvichack River from the watchman of the Graveyard Point Cannery. It was the first net location south of the north-eastern boundary line. Lyle Smith took ownership of the second net location down from the boundary line. The two men fished independently but from time-to-time partnered. They had grown up together since childhood and were close friends. Off season, they spent time together, and their families continued to be intertwined, with the children growing up side-by-side.

As time progressed, more net locations were added below the boundary line. The Vantrease family (later to become the Ten Kleys) began to gain some net locations. Then both the Armstrong and Smith families each gained an additional net location further down from the boundary line so that the net locations finally laid out Armstrong, Smith, Armstrong, Smith, Vantrease, Vantrease, and so on.

Response to Suggested Proposal 275 and ACR 11
Smith/Ten Kley



PC 19
2 of 4

Issue

Instead of 1980 as stated in Proposal 275, it was during the early-1990's, based on a journal entry and several personal recollections, that the Armstrongs added an additional net location above their first on the north-eastern boundary line. They initially referred to it as a half-site net location.

Earlier however, the State of Alaska had initiated the Department of Natural Resources Shore Fishery Leasing Program for Commercial Set Net. The Armstrong's two net locations referenced in Proposal 275—the original mid-1950's net location and the newer early-1990's net location—as well as their prior net location further down from the boundary line, were not established within the shore fisheries lease program, while all the other adjacent net locations were surveyed, recorded, and leased from the State of Alaska by their owners.

Statement

The Armstrongs are our dear friends and so this is a difficult action for us to provide comment.

We acknowledge the mid-1950's net location on the north-eastern boundary line as it has been historically established. However, we do not endorse moving the boundary line to include the newer early-1990's net location located above what was widely known to be the north-eastern boundary line.

The inclusion of the newer early-1990's net location has had an economic impact on a number of the adjacent net locations over the years. It has limited the amount of fish caught for several of the net locations south of the north-eastern boundary line.

Final Recommendation: We would support an north-eastern boundary line change that accommodated the Armstrong's initial mid-1950's net location. We would not support moving the north-eastern boundary line to include the newer early-1990's net location.

Evidence

- *Attachment:* DNR Shore Fishery Diagram SFP-1333 (SFDI-1333) which includes the signatures of Dick Armstrong, Lyle Smith, Curt Armstrong, and L. Tiel Smith. Dated August 19, 1988. All four original net locations of the Armstrongs and Smiths, with the Armstrong's mid-1950's track on the farthest eastern boundary line, are included in the survey. The Armstrong's newer early-1990's net location is not included in the survey.
- *Survey Plat Link:* <http://dnr.alaska.gov/gis/raster/dnr/surveys/20000731/00020487.pdf>

**Response to Suggested Proposal 275 and ACR 11
Smith/Ten Kley**



Notary and Signature

I submit these statements and affirmations as if given under oath.

STATE OF ALASKA)
THIRD JUDICIAL DISTRICT) ss:

THIS IS TO CERTIFY that on this 3rd day of March 2015, before me, the undersigned Notary Public in and for Alaska, personally appeared L. Tiel Smith, known to me and to me known to be the signatory described herein and who executed the foregoing document and he acknowledged to me that he signed the same as his free and voluntary act and deed, for the uses and purposes therein stated.

IN WITNESS WHEREOF, I hereunto set my hand and official seal on the day and year first hereinabove written.

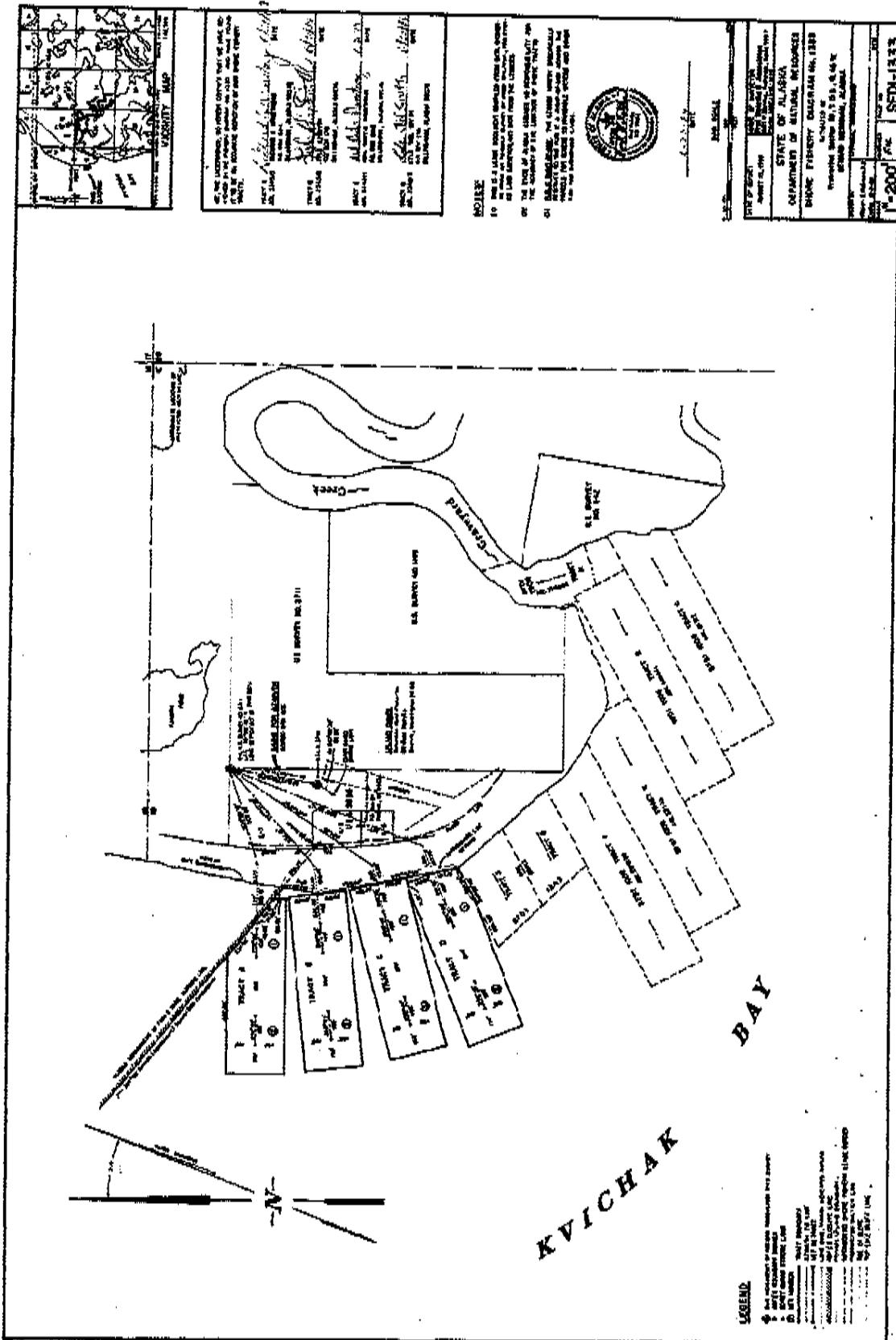
Francisca Demoski
Notary Public in and for Alaska

Seal:



My commission expires: 1/5/19

Response to Suggested Proposal 275 and ACR 11 Smith/Ten Kley



A B C D
1 2 3 4



Submitted By
George V. Hartley
Submitted On
3/3/2015 2:29:26 PM
Affiliation
Branch River Air Service, Inc.

Phone
907-248-3539
Email
bras@alaska.net
Address
4540 Edinburgh Dr.
Anchorage, Alaska 99502

IN Response to Proposal 277

It is my observation as an Air Taxi Service operating in Bristol Bay that escapement goals should reflect all users of the salmon return resources. The life cycle of the Pacific Salmon and specifically sockeye salmon is well documented. Its impact on Bristol Bay is well documented. The escapement goals should reflect the total impact on the inland waterways that the salmon use to propagate and nurse its young. The impact that these fish have on the habitat of many species of bird, animal, plant, and marine life is huge. Without a viable return these inland resources are impacted in negative ways. The economic impact of a down side return is felt by all who work and rely on these resources directly and indirectly. An Optimum escapement should take all inland waterway users in regard and help to fulfill the natural and rich habitat that all inland users, both human and flora and fauna, must have to sustain a viable and vibrant future. The sockeye escapement is the fuel source that drives the inland waterways in nutrients that feed the fisheries and natural inhabitants of this great resource. Please keep this in mind with coming to terms with putting a number on escapements. We need higher numbers to sustain to a high standard that which Bristol Bay has become famous for. We all know that the commercial fishing is one of the best in the world. We also know that our sport fishing is some of the best in the world. Both need and deserve to survive. Also what we know is that when commercial caught fish glut the market, prices to the commercial fishermen come down. So, an attempt to minimize escapements for the good of the commercial fleet does not necessarily mean a big pay check for the hard working commercial fishermen. But a consistent optimal return, with an abundant escapement to replenish these returns would impact all the user groups in a most beneficial and sustainable manner.