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MEMORANDUM

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME


Boards Support Section

TO: Alaska Board of Fisheries

DATE: November 9, 2017

THRU:

PHONE: 907-465-6095

FROM: Glenn Haight, Executive Director 
Alaska Board of Fisheries

SUBJECT: Prince William Sound
Finfish Proposal 41

Boards Support heard from the author of Proposal 41, Ms. Shawna Williams. Ms. Williams felt the lead-in language prepared by the Department incorrectly positioned her proposal. The lead-in language reads:

5 AAC 24.335. Minimum distance between units of gear.
Prohibit operation of commercial salmon drift gillnet gear within 60 fathoms of the shoreward of a set gillnet in the Crafton Island Subdistrict, as follows:

Ms. Williams asked it to read:

5 AAC 24.335. Minimum distance between units of gear.
Allow [PROHIBIT] operation of commercial salmon drift gillnet gear within 60 fathoms of the shoreward of a set gillnet in the Crafton Island Subdistrict, as follows:

Ms. Williams proposal seeks to allow drift gillnet harvesters to operate on the shore side of a gillnet operation in the Crafton Island Subdistrict when the gillnet is affixed to an offshore pinnacle that puts the set gillnet operation beyond the shore.

The department reviewed Ms. Williams concerns and agrees that the lead-in language should be reflected to read "Allow".



Submitted By
Rod Arno
Submitted On
11/16/2017 11:54:15 AM
Affiliation
Alaska Outdoor Council

Phone
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Email
Rodarno@gmail.com
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310 K Street, Suite 200
Anchorage, Alaska 99501

The Alaska Outdoor Council's position and comments on select proposals before the Alaska Board of Fisheries (BOF), December 1 - 5, 2017.

Proposal 10. Adopt. A large portion of the 18.9 million acres in the Copper River drainage is accessible to and fished by a number of holders of Alaskan fishing license. As written in 5 AAC 39.222(f)(25) defines optimal escapement goal as the number of salmon allowed inriver to meet biological and allocative management goals. Such action by the board would be consistent with the Alaska State Constitution Article VIII Sections 1 through 3. Providing a consistent salmon harvest for a large proportion of Alaska's current population of licensed users would be in the public's interest.

Proposal 18. Adopt. With current salmon stocks in the Copper River drainage there appears to be no good justifiable statutory reason to tie the low percentage of salmon harvest by Alaskan residents with that of commercial fishing opportunity. Inriver users in the Copper River drainage are a small percent of the total salmon harvest and could be better assured of an annual harvest.



National Garden Clubs, Inc.



PC03
1 of 2

Deen Day Sanders
Honorary Life President

November 17, 2017

Re: ACR01

Dear Members of the Alaska Board of Fish and Game ~

I have lived in Fairbanks for 45 years, and I own a cabin in Minto Flats. I have frequented the Flats for the past 36 years. When I first started fishing there, the pike fishery was fairly exciting! (I use the word "fairly" because the old-timers told me there were not near as many fish as there had been previously.) It was not uncommon to catch a large pike - and as you must know, there are few fish that are as exciting to land. That was 35 years or so ago. Over the course of these years, I have personally seen the fishery in a major decline, to the point where now you are lucky to catch a nice fish.

What a shame to let this pristine fishery decline to such a degree before taking action. I was so proud of the Board when I heard you had restricted subsistence fishing through the ice for three miles upstream from the mouth of Goldstream on the Chatanika River, in order to save approximately half of the spawning females and let the fishery recover. Now, as I understand, after only one season, you are considering reducing that restriction from the three miles to only one mile.

I have seen the studies by our Fish and Game professionals that prove that very little of the population overwinters within one mile of that confluence. Most of them overwinter within miles 2 through 3, and 5 through 10 upriver from the confluence. If the three mile limit stays in effect, you are helping to save about half of the females. If you reduce that to the proposed one mile limit, you are saving very few. This has been proven by Fish and Game studies and it's my understanding that you've been provided copies of those studies. Reducing these limits to one mile is unacceptable.

Even though I have heard that a subsistence fisherman fished at a spot above the three mile closure and only caught one fish, the studies referred to above have proven that

MISSION STATEMENT

National Garden Clubs, Inc. provides education, resources and national networking opportunities for its members to promote the love of gardening, floral design, civic and environmental responsibility.



recycled paper



the fish are there. It is my hope that we have not let the fishery decline so much since those studies, by our inaction to conserve these pike for so many years, that the Minto Pike are possibly at more of a risk that we think!

These pike are important to many of us, as are our lands. Alaska is one of the last great frontiers and it's our job to protect all of it - not just for a few but for us all! We must practice conservation and sustainable harvesting - we need to preserve, protect, and restore our natural environment, natural ecosystems, vegetation, and wildlife for our future generations.

This is important, and it's in your hands. Please act responsibly for us and our children!

Sincerely,

A handwritten signature in cursive script that reads "Becky Hassebroek".

Becky Hassebroek
Wildlife Chairman
518 Slater Drive, Fairbanks, AK 99701
(907) 456-3066



Submitted By
Bill Sidney
Submitted On
10/29/2017 8:31:34 AM
Affiliation

If you can snag? why not use a BOW to havest your fish , it is not why should you be able ,
it is why you should NOT be able ? This is a very small portation of the sporting public that will do it ,



Submitted By
Brian charlton
Submitted On
11/17/2017 6:28:33 AM
Affiliation
Dipnetter

I am in support of continued dipnetter from boats in the subsistence areas of the copper river. I have been a dipnetter for over 20 years. I have fished in the canyon, I have chartered with Hem, I ran a fish wheel, and now I dip from a boat. It is clear to me that dipnetter in boats are taking way fewer fish than fish wheels. Also, not all boats or people are capable of handling the treacherous nature of the canyon. The subsistence area is much safer and accessible. I urge you to support fair and equal access for all Alaskans!



Chairman John Jensen
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811

RE: Comments on the 2017 PWS Finfish Proposals 42-45

Dear Chairman Jensen and Members of the Board,

Thank you all for your service and the opportunity to submit opinion regarding the upcoming 2017 PWS BOF meeting. My name is Christopher Scott Thomas and I am a lifelong Alaskan. I have been a PWS setnet permit holder for 14 years, served as the PWS Setnet Association representative, and actively fish in the Eshamy District with my wife and two daughters.

Proposal 42: Oppose.

Proposal #42 looks to eliminate setnetting as a viable means of fishing. It allocates more area to the drift fleet, reduces access to waters for the setnet fleet, and allows for the operation of nets 3 times the length of a setnet on either side of that given setnet. Proposal 42 would “throw-out” all existent distance between gear regulations. All leased sites would be delegitimized and worthless. Proposal 42 would increase conflict, jeopardize safety, and have a huge impact on allocation.

Proposal #43: Oppose.

Additional time is not necessary. Drift fishermen need only move the portion of their net that is in violation of statute. Most can do this without much time. Adopting this proposal would create enforcement ambiguity, bordering on impossibility. Generally, active and used setnet sites are not a mystery. Most setnetters check their gear prior to an opener, and all gladly indicate to neighboring drifters if they intend to place gear at a particular site.

Proposal #44: Oppose.

Under current state law, setnet crew members are allowed to set and operate gear. These laws are consistent across the State of Alaska. Setnet skiffs are generally not well suited to operating a full 150 fathoms of gear. Hence, many setnet permit holders and family have multiple skiff to share in the burden of deploying and recovering gear in a manner that is safe and reduces conflict. The notion by the proposal that the permit holder is absent is misleading. Often adjacent sites are held by the same permit holder, if not adjacent, most are within sight. Additionally, many setnet holders and crew are family run. One family member sets one net, a



daughter/son/spouse sets another, the family regroups and starts working the gear. My case in point, I set one net, my spouse sets a second, and my two daughters set the third. This is not only legal; it is likely the exact reason for the statutes written as they read. The notion that this type of operation is illegal, is inconsistent with all existent Alaska statutes. Finally, Proposal 44 is strongly allocative in that it delays the deployment of gear of a single group. Drifters would be allowed to deploy a full allotment of gear at 8am, setnetters would only be allowed 1/3 of that.

Proposal 45: Oppose.

Proposals similar to this have been submitted the previous 3 board cycles. The Board has ruled that it would create too much conflict, safety concerns, and enforcement issues. The number of permits has not changed. The perception of more gear is probably the result of recent management reductions in fishing area. Adding to that perception are fishing periods that change area during an opener. Many fisherman (same as the drifters) will fish one place, until the point that everyone must move to a smaller geographical area. Openers such as this require setnetters to have multiple sets in order to be able to fish for the entire period. No other fishery in the state limits the number of sets.

Many Thanks for your time, service, and efforts on all our behalf,

C. Scott Thomas



Submitted By
Caleb Preston
Submitted On
11/16/2017 4:19:46 PM
Affiliation

2017 Board of Fish Written Comments

Submitted by Caleb Preston

Nov 16th, 2017

Dear Board of Fish,

I appreciate the opportunity to submit my comments to the recent 2017 proposals. My grandparents bought our Main Bay set permit in 1979 and as a third generation fisherman, my family's livelihood revolves around a viable fishing operation. With the extremity at which some of these proposals mean to alter this livelihood, I feel compelled to share my comments.

Proposal 40: Support. I too have experienced the frustration of having drift gillnet gear fished at 60 fathoms and drift into the illegal range. It's tough to see a 150 fathom drift net fixed as a set net in front of your gear. If law enforcement feels this proposal will enable them to better prevent the root issue of drift gillnetters operating as set gillnets, then I would support this proposal.

Proposal 41: Oppose. I feel that this could get real messy. If you have a drift gillnet deployed in a parallel arc alongside a setnet, I see only increased conflict between users as the current could push the drift gear into the setnet. Also, it seems like only a handful of set locations would be fishable by drift gillnets under this proposal as most set gillnets are directly fixed to the shore. I don't think this proposal is worth it for either group or enforcement.

Proposal 42: Oppose. This proposal would massively shift allocation away from set gillnetters and I strongly oppose it.

For starters, there is a limited room within the Main Bay Subdistrict and when all gear types are restricted to Main Bay Only. Having the ability to fish 100 fathom sets is essential to deploying all of our gear. Restricting setnetters to fish only 50 fathoms per set would only expand the number of set net sites within Main Bay, reducing the harvest for both gear types, significantly increasing conflict and ultimately going against the author's intent to give the drift fleet more beach access.

Outside of the THA, set nets need to be 100 fathoms apart but drift gillnets can be within 25 fathoms of a set net. Drift gillnets are able to harvest off the end of a setnet and already have access to multiple beach sets between set nets.

Drift gillnets are designed to drift, not set net. Beach sites have historically been prioritized for set gillnetters which is why we have our Shore Lease sites. Allowing drift gillnetters to fish within 20 fathoms of a set gillnet would effectively eliminate this priority and give drift gillnets the advantage of both gear types, thus massively reducing set net allocation and viability of set gillnetting in Main Bay.

The final point is that this proposal would put even more burden upon law enforcement in Main Bay. Increasing the density along the shore, and allowing drift gillnets to override set gillnet's historic beach site priority is only going to increase conflicts and reduce enforcement's ability to manage it effectively.

In response, I'd rather see drift gillnets required to fish 30 fathoms away from a set gillnets inside the THA, and 60 fathoms away in the remainder of the Main Bay Subdistrict to match the Crafton Island Subdistrict. This would eliminate the issue of drift gillnets fishing between set nets and would keep both gear types fishing according to their design and reduce the majority of conflict within the district. The majority of fish go around a set net, especially during a build up opener, and drift gillnets are able to effectively harvest these fish off the end of a setnet.

Proposal 43: Oppose. My sites are spread out and it's not uncommon that I'll show up at my 3rd site to find a drift gillnetter has set right up against my running line. Normally, there's no conflict and the fisherman pulls back their gear to the offshore end of my net concurrent with it's deployment. The fisherman has been able to legally harvest in my absence and then pulls their net into legal position. It's only on rare occasion that I've had a drift gillnet not immediately pull back their gear and a conflict has arisen.

In my opinion, this proposal, if passed, would allow a drift gillnetter to take as much time as they wanted to pull their gear back into position. This would only escalate conflicts and increase the burden on law enforcement while detracting from the priority set gillnetters have with our Shore Fisheries Lease sites. I think it's a bad idea.

Proposal 44: Oppose. This issue is already adequately addressed in 5 AAC 39.107 which requires a set permit holder to "Personally operate or assist in operation" in a number of capacities. The current laws allow for crews to set and work gear per the above regulation.

It's not practical nor safe to force a set netter to work 3 separate sites out of 1 skiff, especially when sites are located miles apart and the fisherman is required to travel rough waters in a storm between sites. Many of us fish sites both inside and out of the Main Bay Subdistrict and the ability to set and work those nets concurrently allows us to stay on top of our gear and lower the risk of traveling with heavy loads in rough weather.



I feel this proposal is highly allocative in nature, especially when viewed in light of the others proposed by the same could restrict set netters to 1 skiff (Prop 44), they'd be able to deploy their nets before we can deploy our 2nd/3rd sites, take as much time as they wanted to retrieve their gear (Prop 43) and override the seniority we have with our shore fisheries leases and site lengths (Prop 42). Any of the proposals, if passed on their own, would materially impact allocation and if all passed would jeopardize the livelihood of setnetting in Main Bay.

Proposal 45: Oppose. This proposal is highly impractical and would both impact the safety and allocation of gear groups.

I've been running our family's permit for 12 years and it still takes me 4-5 hours to set a net's running line structure. We fish a hook on our nets that require 5+ anchors, each with hundreds of feet of anchor and safety line. It is a structure that's meant to be set at the beginning of the season and pulled up at the end. It is not practical to think that a set netter can pull up and deploy a site at will or in preparation for every opener.

It's also a dangerous process. Some set netters in high current locations use multiple anchors weighing hundreds of pounds. These sets can only be constructed on a calm day during a closure. There's would be no safe way to deploy a running line structure during rough weather or in the presence of drift gillnet gear in the close vicinity of the set location.

Over the past 12 years, I have not seen a significant increase in the rise of set net sites. What I have seen is trend of fishing Main Bay Only or Crafton Island Subdistrict Only. Since a set netter needs sites to house their entire 150 fathoms of gear, it's necessary to have adequate site locations to house those nets whether Main Bay is open or not.

I've seen drift gillnets fish next to un-fished setnet locations consistently over the years and it doesn't appear to limit their harvest. I can understand the frustration of fishing next to running lines, but the irritation it causes the drift gillnet fleet doesn't merit of restriction this would cause on the set gear type.

Proposal 48: Oppose. My desire is to see the chum fishery support cost recovery efforts prior to July 18th as originally intended. The interception of Main Bay sockeye and Wild Coghill sockeye in particular impacts management and our allowable fishing time.

Proposal 49: Support. I support Option 1 which would advise PWSAC to follow the regulation and eliminate the common property seine fishery prior to July 18 and have the fishery return to a cost recovery fishery like it was prior to 2004.

Thank you for your consideration.

Sincerely,

Caleb Preston



Submitted By
Chuck Derrick
Submitted On
11/9/2017 10:00:54 PM
Affiliation
Chitina Dipnetters Association

Phone
907-378-5527
Email
cderrickak@gmail.com
Address
POBox 72665
Fairbanks, Alaska 99707

These proposal comments represent the views of the Chitina Dipnetters Association.

Proposal 10 Support

We feel that it is time for the BOF to establish an Optimum Escapement Goal (OEG) for both Copper River sockeye and a separate OEG for Copper River Chinook. An OEG would better address the needs of the inriver users and could allow the BOF to add to the SEG, additional salmon to meet those needs.

Proposal 13 Oppose

Dipnetting for salmon from a boat has become the preferred method of many users in the upriver Personal Use and Subsistence fishery. Whether from shore or boat, the purpose of dipnetting is to harvest fish.

Proposal 15 Oppose

There is no evidence that monofilament nets increase mortality in released salmon. In the PU diipnet fishery, if this proposal passes, you would be ordering a majority of the 10,000 dipnetters to buy new nets.

Proposal 16 Oppose

Harvests are already recorded on the users permit.

Proposal 17 Support

Increasing the length of the PU dipnet fishery would alleve crowding and open new area that would be better for dipnetting from a boat than the turbulent waters of the canyon. Unlike in the commercial fishery at the mouth where salmon harvest numbers are only limited by time periods, increasing the PU dipnet area would most likely not mean an increased harvest because dipnetters fish under a set bag limit.

Proposal 18 Support

The PU dipnet fishery opening and closing are based solely off of the sonar count passage numbers. When commercial fishermen are restricted because of low run numbers, those low numbers will show as low sonar counts, triggering closures in the dipnet fishery. To require that the PU dipnet fishery salmon allocation drop from 150,000 to 50,000 just because the commercial fleet has been restricted for 13 consecutive days, while the PU fishery would bear the same restrictions, is unjustifiable. This allocation reduction would be for the remaning dipnet season even though run numbers may rebound soon after. It is time to remove this regulation from the books.

Proposal 28 Oppose

The inside mandatory closures were instituted as a chinook salmon conservation measure. Chinook tend to mill in the shallower waters at the mouth of the Copper River and are very vulnerable, especially at low tide, to drift gill nets.

Proposal 36 Oppose

This proposal would prohibit the Dept. F&G from managing the commercial fishery if low run numbers indicated closures were warranted. It would also eliminate the mandatory inside water closures which were put in place as a chinook conservation measure.



November 9, 2017

Chairman John Jensen
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811

RE: Comments on 2017 PWS Finfish proposals 32, 33, 34

Dear Chairman Jensen and Members of the Board,

Copper River Prince William Sound Marketing Association (CR/PWSMA) is the non-profit regional seafood development association for all Area E fisheries, currently marketing salmon for approximately 550 drift and set gillnet fishermen. Our mission is to maximize the value of Copper River and Prince William Sound salmon fisheries through effective marketing, quality enhancement, cooperative partnerships, and organizational competency to the benefit of its members.

Thank you for the opportunity to comment on several of the proposals before you. On behalf of our members, the Board of Directors has prepared the following comments.

Proposal 32: Prohibit commercial salmon fishing in the Copper River District, during the month of May, if the preseason forecast for Copper River king salmon is below the 20-year average, or 35,000 king salmon - OPPOSE

Alaska statute states the Alaska Department of Fish and Game commissioner shall “manage, protect, maintain, improve and extend the fish, game and aquatic plant resources of the state in the interest of the economy and general well-being of the state;” (emphasis added) Such a prohibition places an undo burden on the commercial fleet and has the power to devalue the economies of coastal Alaskan communities.

In-season data collection is the foundation of sustainable fisheries management; in-season data is the best data available, a pre-season forecast is not. The commercial salmon harvest is a critical element of the in-season data collection allowing fishery biologists to react to either abundance or scarcity. This proposal places a pre-season forecast in a position of primacy to the fisheries management plan and in-season management.

Proposal 33: Prohibit sale of commercially caught king salmon in the Copper River District if restrictions on Copper River drainage subsistence fisheries have been implemented – OPPOSE



All user groups share the burden of restrictions in times of scarcity as a resource management tool. Commercial harvest in the Copper River district is the first data available that indicates run strength in-season. It is harvest data, provided by the commercial fleet that indicated Copper River Chinook abundance in 2017 allowed for upriver restrictions to be lifted. The commercial fleet continued to fish under time and area restrictions during Chinook and sockeye management.

The purpose of commercial fishing is the harvesting, sale, and distribution of salmon. Not selling commercially harvested Chinook salmon would be a waste of the valuable resource. Arbitrarily prohibiting the sale of salmon regardless of run strength would be detrimental to economies of coastal Alaska.

Proposal 34: Prohibit commercial salmon fishing in the Copper River District until a salmon is recorded at the Copper River sonar – OPPOSE

Customarily the Copper River salmon season opens to commercial and subsistence harvest mid May. The lag or travel time from the mouth of the Copper River on the Gulf of Alaska up to the ADFG sonar station at Miles Lake can be as long as 10 days. Many thousands of salmon can be traveling up river before a fish passes that sonar. For the past 3 years Copper River Prince William Sound Marketing Association has solely funded additional sonar on the Copper River to address this lag time. The Lower Copper River Sonar, operated by the Prince William Sound Science Center, provides ADFG additional data regarding early season fish passage into the Copper River.

The Copper River salmon fishery opens the statewide salmon industry. The early timing of the Copper River fishery drives value for that harvest. Prohibiting early season salmon fishing would have cascading negative effects on 500 plus independently owned small family businesses. The early fresh season sets the tone for Prince William Sound salmon prices throughout the five month salmon season. Knowing the value of salmon to the seafood industry (the most valuable species*) and the contribution of commercial fishing to Alaska coastal communities (the largest private sector employer in the state*) this should not be taken lightly.

We trust that the points raised in these comments provide you with sufficient information to aid in your final determinations during this fishery review. Thank you for your service to this valuable resource and the communities that depend on it.

Sincerely,

Christa Hoover, Executive Director
Copper River Prince William Sound Marketing Association
executivedirector@copperrivermarketing.org

Supporting Documents:

CR/PWSMA Resolution 2006-06-06

Socioeconomic Benefits of the Prince William Sound Gillnet Fishery, Resilient Economics, LLC

*The Economic Value of Alaska's Seafood Industry, Alaska Seafood Marketing Institute



RESOLUTION 2006-06-06

A RESOLUTION by the COPPER RIVER/PRINCE WILLIAM SOUND MARKETING ASSOCIATION BOARD of DIRECTORS SUPPORTING CONSISTENT SHORT EARLY SEASON OPENERS INSTEAD OF PROLONGED CLOSURES OF THE COPPER RIVER DRIFT GILLNET SALMON FISHERY

WHEREAS the Alaska Statutes state the Alaska Department of Fish and Game commissioner shall, “manage, protect, maintain, improve, and extend the fish, game and aquatic plant resources of the state in the interest of the economy and general well-being of the state;” and

WHEREAS the Copper River drift gillnet salmon fishery is important to the economic well-being of the City of Cordova, Alaska; and

WHEREAS prolonged early season closures of Copper River drift gillnet salmon fishery adversely affect the economic well-being of fishermen due to lost fishing time; and

WHEREAS prolonged closures adversely affect seafood processors due to lost markets, reduced productivity, and idle plant employees; and

WHEREAS an unreliable fishing schedule disrupts product distribution to the markets and consumer demand for Copper River salmon; costing the seafood industry millions of dollars; and

WHEREAS a consistent schedule of short early season openers reduce the adverse economic impact felt by fishermen, processors, industry employees, distribution markets and the City of Cordova, Alaska caused by prolonged closures.

NOW THEREFORE BE IT RESOLVED THAT the Copper River/Prince William Sound Marketing Association supports the economic well-being of the Copper River drift gillnet salmon fishery, it’s fishermen, processors, seafood workers, seafood distribution chain, and City of Cordova, Alaska and supports having consistent, short early season openers of the Copper River drift gillnet salmon fishery as opposed to prolonged closures.



RESOLVED AND ADOPTED by the Copper River/Prince William Sound Marketing Association Board of Directors and signed on this 22 day of July, 2015, **nunc pro tunc** with an effective date of June 6, 2006.

A handwritten signature in blue ink that reads "Thea Thomas".

Thea Thomas, Secretary

Copper/River/Prince William Sound Marketing Association

7/22/15
Date



Socioeconomic Benefits of the Area E Gillnet Fishery

Prepared for the Copper River/Prince William Sound Marketing Association

Under Contract # 09012017

Dr. Sarah Kruse, Resilient Economics LLC

November 2017

ABSTRACT

The Area E gillnet fishery is generally recognized as an important contributor to the local and regional economies. In an effort to better understand how future fishery policy changes potentially could impact not just those who fish, but also the broader economy, the Copper River/Prince William Sound Marketing Association contracted Resilient Economics to assess the direct, indirect and induced economic impacts of this fishery.

For such an analysis, collection of primary data specific to the fishery and study area ideally would occur; however, time constraints prevented the collection of any primary data, so all results are derived from existing data and sources publically available at the time this study was conducted. While this is a recognized limitation, we also believe that the existing studies and data sources used provided sufficient detail and specificity, allowing for estimation of a reasonable range of economic benefits associated with the Area E gillnet fishery. Existing data sources are cited in both the narrative and footnotes.

Key findings from this study are as follows:

- In 2016, the estimated value Area E drift and set gillnet permits totals almost \$90 million dollars. Alaska residents hold 77.0% of these permits and 41.2% are held by residents of Cordova.
- A recent study by Wood (2017) of Bristol Bay gillnet fishery permit values found that “total earnings have a positive and significant relationship with permit prices, and total costs have a negative and significant relationship in both the short- and long-run”¹ – suggesting that permit holders individual finances and economic behavior may not only be affected by their annual earnings in the fishery, but also by how the fishery does as a whole.
- Over the last ten years, ex-vessel revenues from the Area E gillnet fishery totaled almost half a billion dollars, with average annual revenues of just under \$50 million. Alaska and Cordova residents earned 79.5% (\$391.1 million) and 41.8% (\$205.4 million) of these ex-vessel revenues.
- In 2016, the Area E gillnet fishery accounted for an estimated \$20.3 million in direct economic benefits (i.e., ex-vessel revenues of residents and spending by non-residents who season there) and \$32.1 million (including harvesting and processing) in total economic impact for Cordova.
- In 2016, the Area E gillnet fishery accounted for an estimated \$36.3 million in direct economic benefits (i.e., ex-vessel revenues) and \$65.6–\$67.7 million (including harvesting and processing) in total economic impact for Alaska.
- From 2007-2016, the Area E gillnet fishery accounted for an estimated \$491.8 million in direct economic benefits (i.e., ex-vessel revenues) and \$887.8–\$915.2 million (harvesting and processing) in total economic impact for Alaska.

¹ Wood, MD. 2017. Analyzing factors affecting Alaska's salmon permit values: evidence from Bristol Bay drift gillnet permits. Thesis (M.S.) University of Alaska Fairbanks.



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1. SCOPE OF WORK

The Alaska Department of Fish and Game (ADFG) defines the Prince William Sound (PWS) fisheries management area, also known as Area E, as “all coastal waters and inland drainages entering the north central Gulf of Alaska between Cape Suckling and Cape Fairfield as well as the Bering and Copper rivers”.² Area E is also further divided into 11 districts for the purposes of salmon and herring management. Within this management area, the commercial gillnet fishery is a limited entry fishery composed of two permit types: S03E – drift gillnet and S04E – set gillnet.

The Area E gillnet fishery is generally recognized as an important contributor to the local and regional economies. In an effort to better understand how future fishery policy changes affecting harvest potentially could impact not just those who fish, but also the broader economy, the Copper River/Prince William Sound Marketing Association (CR/PWSMA) contracted Resilient Economics to assess the direct, indirect and induced economic impacts of the Area E gillnet fishery using existing data sources.

The remaining sections of this study present methods and results for the following:

1. Limited-entry permit values and the distribution of Area E gillnet fishery permit holders by geographic location.
2. Copper River District (CRD) commercial drift gillnet ex-vessel values.
3. Area E gillnet fishery ex-vessel values (drift and set gillnet combined). These results are presented for a) all permit holders; b) Alaska permit holders; c) Valdez-Cordova Census Area (CA) permit holders; and d) Cordova permit holders only.
4. Multiplier values associated with the Area E gillnet fishery.

Note that all dollar estimates included in this document are adjusted for inflation using the Bureau of Labor Statistics Consumer Price Index (CPI) and are presented in real 2016 dollars (2016\$) rounded to the nearest hundred.³

2. METHODS

This section provides a brief overview of data collection methods used. As there are several different analyses conducted in this study, methods for each analysis are included in that section.

The following data were downloaded from the Commercial Fisheries Entry Commission (CFEC) website⁴ for the commercial drift and set gillnet fisheries for the years 2007-16:

- Permanent permits renewed;
- Interim permits issued;
- Total permits issued/renewed;
- Total permits fished;
- Total pounds harvested;
- Average pounds harvested;

² Accessed September 2017 at <http://www.adfg.alaska.gov/FedAidPDFs/FMR17-17.pdf>.

³ Accessed May 2017 at https://www.bls.gov/data/inflation_calculator.htm.

⁴ Accessed September 2017 at https://www.cfec.state.ak.us/fishery_statistics/earnings.htm.



- Total gross earnings;
- Average gross earnings; and
- Average permit price.

These data were downloaded for a) all permits; b) all permits registered in the Valdez-Cordova Census Area; and c) all permits registered in Cordova.

ADFG Annual Prince William Sound Area Finfish Management Reports⁵ were used to obtain the following information on the Copper River District drift gillnet fishery for the years 2007-2016:

- Number of permits;
- Number of salmon harvested by species;
- Average weight by species (for PWS - drift gillnet); and
- Average price per pound by species (for PWS - drift gillnet).

Data for the year 2016 were obtained directly from ADFG staff as the 2016 report had not been published at the time this study was conducted.

3. PERMIT VALUES

In 2016, 537 drift gillnet permits and 29 set gillnet permits were issued for the Area E gillnet fishery, with average permit prices of \$155,400 and \$190,800, respectively. These limited entry permits do not necessarily contribute directly to the economy themselves, but do provide real value to the holders as these individuals have the right to transfer the permits through gift, inheritance or sale.

A recent study by Wood (2017) of Bristol Bay gillnet fishery permit values found that “total earnings have a positive and significant relationship with permit prices, and total costs have a negative and significant relationship in both the short- and long-run”⁶ — suggesting that permit holders individual finances and economic behavior may not only be affected by their annual earnings in the fishery, but also by how the fishery does as a whole.

Table 1 shows the estimated value of Area E gillnet fishery permits for the current year and averaged over the last ten years (in real dollars). In both cases, the estimated value of permits from PWS drift and set gillnet combined totals almost \$90 million dollars.

Table 1 PWS gillnet permit values

2016	Drift Gillnet	Set Gillnet	2007-2016	Drift Gillnet	Set Gillnet
Permanent Permits	537	29	Permanent Permits	537	29
Avg. Permit Price	\$ 155,400	\$ 190,800	Avg. Permit Price	\$ 160,800	\$ 110,400
Estimated Total Value	\$ 83,449,800	\$ 5,533,200	Estimated Total Value	\$ 86,349,600	\$ 3,201,600

⁵ Accessed September 2017 at <http://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareapws.salmon#management>.

⁶ Wood, MD. 2017. Analyzing factors affecting Alaska's salmon permit values: evidence from Bristol Bay drift gillnet permits. Thesis (M.S.) University of Alaska Fairbanks.

We also used the CFEC data to analyze the geographic distribution of Area E gillnet permit holders by geography—with a focus on Cordova and the nearby region. As seen in Table 2, Cordova residents hold over 40% of permits and Alaskans hold almost 80%. It is important to note that residency is based on the address a permit holder registers with the CFEC—which in some cases may or may not be where the individual resides full time.

Table 2 Distribution of PWS gillnet permit holders by geographic area

Area	# of Permit Holders	% of Total
Cordova	233	41.2%
Valdez-Cordova CA	239	42.2%
Alaska	436	77.0%
Total	566	—

4. COPPER RIVER DISTRICT

As mentioned previously, estimates of ex-vessel revenues for the CRD drift gillnet fishery were calculated using ADFG data. The following steps were used:

- For each species (i.e., Chinook, sockeye, coho, pink & chum) the number of fish harvested was multiplied by the average weight per fish resulting in the total pounds harvested. Note that the “average weight” values used were not specific to the Copper River District, but were for PWS as a whole. Average weight estimates were not available at the district level.
- For each species the total pounds harvested was then multiplied by the average price per pound resulting in total ex-vessel revenues.
- Ex-vessel revenues for all species were summed resulting in total ex-vessel revenues for the CRD.
- Estimated total ex-vessel revenues were updated to constant 2016 dollars using the CPI.

In 2016, ex-vessel revenues for the CRD drift gillnet fishery were an estimated \$20.5 million—which represents almost 60% of the total Area E drift gillnet ex-vessel revenues (\$34.8 million) for this year. It should be noted that this estimated total value (as reported by ADFG) varies slightly from the CFEC estimated total value used in the following sections.

From 2007-2016, ex-vessel revenues for the CRD drift gillnet fishery totaled \$221.6 million dollars. While there has been considerable annual variability, mean and median annual ex-vessel revenues were \$22.2 million and \$24.2 million, respectively (see Table 3).



Table 3 Copper River District drift gillnet ex-vessel revenues

Year	Millions (2016\$)
2007	\$ 27.8
2008	\$ 8.4
2009	\$ 15.1
2010	\$ 11.5
2011	\$ 29.1
2012	\$ 25.4
2013	\$ 27.7
2014	\$ 33.1
2015	\$ 22.9
2016	\$ 20.5
10-Year Total	\$ 221.6
Mean	\$ 22.2
Median	\$ 24.2

On an individual level, the mean and median ex-vessel revenues for the average active permit holder were \$43,800 and \$47,200, respectively (see Table 4). In total, the average active permit holder would have earned almost half a million dollars in ex-vessel revenues just from the CRD during these 10 years.

Table 4 Copper River District average earnings

Year	Active Permits	Per Permit (\$2016)
2007	494	\$ 56,300
2008	492	\$ 17,100
2009	486	\$ 31,100
2010	495	\$ 23,300
2011	485	\$ 59,900
2012	510	\$ 49,900
2013	515	\$ 53,700
2014	533	\$ 62,200
2015	515	\$ 44,500
2016	509	\$ 40,200
10-Year Total		\$ 438,200
Mean		\$ 43,800
Median		\$ 47,200

5. PRINCE WILLIAM SOUND

As mentioned previously, the Area E gillnet fishery is comprised of two permits: S03E – drift gillnet and S04E – set gillnet. Participation and earnings data for each permit were downloaded from the CFEC website for the last ten years. CFEC data were used for this component of the analysis as data can be accessed online for various geographic areas, including those included in this analysis.

The drift gillnet is the larger of the two Area E gillnet fisheries—with 537 permanent permits (as of 2016), as opposed to set gillnet, which has 29 permanent permits. Over the last ten years, on average, 516 permits and 28 permits were active in a given year for the drift and set gillnet fisheries, respectively.

Unless otherwise noted, information in the following sections is for the two fisheries (i.e., drift and set gillnet) combined.

5.1. ALL PERMITS

In 2016, ex-vessel revenues for the Area E gillnet fishery, calculated using CFEC data, totaled \$36.3 million—with the drift gillnet fishery accounting for approximately 95% of these revenues (see Table 5).

Table 5 2016 Area E gillnet fishery

Permit	Permanent Permits Renewed	Total Fished	Ex-Vessel Revenues (millions \$)	Average Gross Earnings
Drift	537	517	\$ 34.4	\$ 66,500
Set	29	29	\$ 1.9	\$ 66,100
Total	566	546	\$ 36.3	\$ 66,500

From 2007-2016, ex-vessel revenues for the Area E gillnet fishery totaled \$491.8 million dollars with mean and median annual ex-vessel revenues of \$49.2 million and \$49.6 million, respectively (see Table 6).

Table 6 10-year summary for Area E gillnet fishery

Year	Millions (2016\$)
2007	\$ 42.8
2008	\$ 39.0
2009	\$ 38.5
2010	\$ 57.0
2011	\$ 57.6
2012	\$ 67.0
2013	\$ 56.4
2014	\$ 56.4
2015	\$ 40.7
2016	\$ 36.3
10-Year Total	\$ 491.8
Mean	\$ 49.2
Median	\$ 49.6

5.2. ALASKA PERMIT HOLDERS

Alaska residents hold the majority of Area E gillnet fishery permits—in 2016, they held 77.3% and 72.4% of drift and set gillnet permits, respectively. Over the last ten years, the proportion of drift gillnet permits held by Alaska residents has remained relatively constant, but set gillnet permits ownership by residents



has dropped from 25 to 21 (out of 29 total—except for in 2007 when there were 30 total) over the last ten years.

In 2016, Alaska residents earned almost \$28.9 million—representing 79.6% of the total \$36.3 million of ex-vessel revenues earned in the Area E gillnet fishery that year. Average earnings per permit holder were an estimated \$68,000 (see Table 7). In comparison, non-residents earned, on average, \$61,100 per permit in 2016.

Table 7 2016 summary for Alaska permit holders

Permit	Permanent Permits Renewed	Total Fished	Ex-Vessel Revenues (millions \$)	Average Gross Earnings
Drift	415	404	\$ 27.5	\$ 68,100
Set	21	21	\$ 1.4	\$ 67,100
Total	436	425	\$ 28.9	\$ 68,000

We also calculated the ex-vessel revenues earned by residents and non-residents over the last ten years (2007-2016). As seen in Table 8, over the past ten years Alaska residents earned the majority of ex-vessel revenues (79.5%), totaling over \$391 million dollars.

Table 8 10-year summary for Alaska permit holders

Alaska	Average Permits Fished/Year	Ex-Vessel Revenues (millions \$)	% of Total Ex-Vessel Revenues	% of Total Permits Fished
Non-resident	118	\$ 100.7	20.5%	21.8%
Resident	425	\$ 391.1	79.5%	78.2%
Total	544	\$ 491.8	—	—

5.3. VALDEZ-CORDOVA CENSUS AREA PERMIT HOLDERS

In 2016, permit holders registered in the Valdez-Cordova Census Area (“VCCA”) held 43.8% (235) and 13.8% (4) of PWS drift and set gillnet permits, respectively. Both permits have seen small but steady decreases in ownership by VCCA residents over the last ten years — in 2007, VCCA residents held 48.8% of drift gillnet permits and 23.3% of set gillnet permits in PWS.

VCCA permit holders earned an estimated \$14.2 million in 2016 — representing 39% of total ex-vessel revenues for that year. Average earnings per permit holder were approximately \$60,800 (see Table 9).

Table 9 2016 summary for Valdez-Cordova Census Area permit holders

Permit	Permanent Permits Renewed	Total Fished	Ex-Vessel Revenues (millions \$)	Average Gross Earnings
Drift	235	229	\$ 13.9	\$ 60,800
Set	4	4	\$ 0.2	\$ 58,800
Total	239	233	\$ 14.2	\$ 60,800



We also calculated the ex-vessel revenues earned by VCCA residents over the last ten years (2007-2016), which totaled approximately \$209 million or 42.5% of total Area E gillnet fishery earnings for that time period.

5.4. CORDOVA PERMIT HOLDERS

In 2016, permit holders registered with addresses in Cordova held 42.6% (229) and 13.8% (4) of PWS drift and set gillnet permits, respectively. Permit holders registered in Cordova earned just over \$14.0 million in 2016 —representing 39% of total ex-vessel revenues for that year. Average earnings per permit holder were approximately \$61,500 (see Table 10).

Table 10 2016 summary for Cordova permit holders

Permit	Permanent Permits Renewed	Total Fished	Ex-Vessel Revenues (millions \$)	Average Gross Earnings
Drift	229	224	\$ 13.8	\$ 61,600
Set	4	4	\$ 0.2	\$ 58,800
Total	233	228	\$ 14.0	\$ 61,500

We also calculated the ex-vessel revenues earned by Cordova residents over the last ten years (2007-2016), which totaled approximately \$205 million or approximately 41.8% of total Area E gillnet fishery earnings for that time period.

5.5. SUMMARY

Table 11 summarizes information from the previous sections and shows estimated annual ex-vessel revenues and totals by geographic location.

Table 11 Annual ex-vessel revenues by area (millions 2016\$)

Year	All	Alaska Residents	VCCA Residents	Cordova Residents
2007	\$ 42.8	\$ 33.6	\$ 20.3	\$ 19.7
2008	\$ 39.0	\$ 30.8	\$ 17.7	\$ 17.3
2009	\$ 38.5	\$ 30.4	\$ 16.8	\$ 16.4
2010	\$ 57.0	\$ 45.3	\$ 22.7	\$ 22.3
2011	\$ 57.6	\$ 45.6	\$ 24.9	\$ 24.4
2012	\$ 67.0	\$ 52.8	\$ 28.2	\$ 27.6
2013	\$ 56.4	\$ 45.2	\$ 24.1	\$ 23.8
2014	\$ 56.4	\$ 46.0	\$ 24.5	\$ 24.3
2015	\$ 40.7	\$ 32.5	\$ 15.7	\$ 15.5
2016	\$ 36.3	\$ 28.9	\$ 14.2	\$ 14.0
Total	\$ 491.8	\$ 391.1	\$ 209.1	\$ 205.4
% of Total	—	79.5%	42.5%	41.8%



6. MULTIPLIER EFFECTS

The direct economic contributions of a given fishery are the value, income and employment the fishery creates—alternately, without the fishery, this value, income and employment would not exist. The economic value of the Area E gillnet fishery, like any fishery, extends beyond the direct economic impacts (i.e., ex-vessel revenues received by fishermen) — as they in turn generate additional economic activity and support other industries in the region/state through a) indirect impacts - the purchase of supplies and services to support their fishing activities (e.g., purchase of a new net or payment for boat maintenance); and b) induced impacts - personal spending by these fishermen as well as any employees (e.g., purchase of groceries). The sum of the direct, indirect and induced impacts is the total economic impact.

Input-output (I-O) modeling is a method commonly used to model the interrelationships of economic sectors and describe the multiplier effect of changes in one sector across a broader economy. This method is frequently used to assess the potential economic impact of a new program or investment in a particular industry, but it can also be used to understand how changes within an existing industry (e.g., decreased revenue and/or jobs) might impact the broader economy. Results of I-O analyses are typically expressed as multipliers that represent the additional economic impact above the direct contributions of the industry being considered.

One of the most commonly recognized models used is IMPLAN, however, as summarized in Seung and Waters (2006), there are a variety of reasons why this model may not be ideal for assessing changes in Alaska fisheries.⁷ A number of individuals and groups have created modified IMPLAN models more suited to assessing Alaska fisheries—for more details on the fundamentals of input-output modeling, as well as how modified models have been made for the fishery context, please refer to Knapp et al. 2013⁸; Leonard and Watson 2011⁹; TCW Economics 2010¹⁰; or Seung & Waters 2006¹¹.

Creating a modified I-O model specific to the Area E gillnet fishery was not feasible for the purposes of this study, so we relied on multipliers derived from existing studies focused on estimating total economic impacts associated with various Alaska fisheries (see Note that the city, region and state estimates of total economic impact do not include ANY benefits associated with permit holders registered outside these areas and as such should be viewed a low-bound estimates. For example, a permit holder from Anchorage who spends the fishing season in Cordova (and makes purchases there) is not accounted for in the calculation of estimated total impact on Cordova. This additional spending (and associated impacts) is discussed further at the end of this section.

Table 12).

Note that the city, region and state estimates of total economic impact do not include ANY benefits associated with permit holders registered outside these areas and as such should be viewed a low-bound estimates. For example, a permit holder from Anchorage who spends the fishing season in Cordova (and

⁷ Seung, C., and E. Waters. 2006. "A Review of Regional Economic Models for Fisheries Management in the U.S." *Marine Resource Economics* 21(1):101–24.

⁸ Knapp, G., M. Guettabi, and S. Goldsmith, "The Economic Importance of the Bristol Bay Salmon Industry" (Anchorage, Alaska: Institute of Social and Economic Research, University of Alaska Anchorage, 2013), available at <http://www.bbrsda.com/wp-content/uploads/2013/05/Economic-Importance-of-Bristol-Bay-Full-Report.pdf>.

⁹ Leonard, J., and P. Watson. 2011. Description of the input-output model for Pacific Coast fisheries. U.S. Dept. Commerce, NOAA Tech. Memo. NMFS-NWFSC-111, 64 p.

¹⁰ TCW Economics. 2010. Economic Contributions and Impacts of Salmonid Resources in Southeast Alaska. Prepared for Trout Unlimited Alaska Program.

¹¹ Seung, C., and E. Waters. 2006.



makes purchases there) is not accounted for in the calculation of estimated total impact on Cordova. This additional spending (and associated impacts) is discussed further at the end of this section.

Table 12 Summary of relevant Alaska fishery I-O multipliers

Study Year	Final Output Multiplier	Region	Fishery	Industry	Source
2013	1.58	Cordova	All	Harvest & Processing	McDowell Group
2017	1.57	Southeast Alaska	All	Harvest & Processing	McDowell Group
2010	2.08	Southeast Alaska	All	Harvest & Processing	TCW Economics
2017	2.34	Alaska	Salmon	Harvest & Processing	McDowell Group
2013	2.27	Alaska	Salmon	Harvest & Processing	ISER
2013	3.05	All US	Salmon	Harvest & Processing	ISER

A few notes on these studies:

- The 2013 McDowell Group study multiplier appears to be the impact of all Southeast Alaska fisheries on Cordova only and includes harvest and processing.¹²
- The 2017 McDowell Group study multiplier for Southeast Alaska represents the impact of all Southeast Alaska fisheries on this region and includes harvesting and processing.¹³
- The TCW Economics multiplier is the estimated impact of Southeast Alaska salmon fisheries for harvesting and processing on the Southeast region.¹⁴
- The 2017 McDowell Group study multiplier for Alaska represents the impact of commercial salmon fisheries on Alaska and includes harvesting and processing.
- The ISER multiplier for Alaska represents the estimated impact of harvesting and primary processing of Bristol Bay salmon on the State of Alaska.¹⁵
- The ISER multiplier for the United States represents the estimated impact of fishing and primary processing of Bristol Bay salmon on the United States.

None of these studies perfectly match the focus of this study, however, they do allow us to present a reasonable range of the broader economic impacts (in terms of final output) associated with the Area E gillnet fishery.

Table 13 shows the estimated total economic impact of the Area E gillnet fishery in 2016:

- Area E gillnet fishery ex-vessel revenues from Cordova permit holders contributed an estimated \$22.2 million in total economic impact for Cordova.
- Area E gillnet fishery ex-vessel revenues from VCCA permit holders contributed an estimated \$22.2-\$29.5 million in total economic impact for the Southeast Region of Alaska.

¹² McDowell Group. 2015. The Economic Impact of the Seafood Industry in Southcentral Alaska. Prepared for the Alaska Salmon Alliance.

¹³ McDowell Group. 2017. The Economic Value of Alaska's Seafood Industry. Prepared for the Alaska Seafood Marketing Institute.

¹⁴ Accessed May 2017 at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd530437.pdf.

¹⁵ Knapp et al. 2013.



- Area E gillnet fishery ex-vessel revenues from Alaska permit holders contributed an estimated \$65.6–\$67.7 million in total economic impact for Alaska.
- Total Area E gillnet fishery ex-vessel revenues contributed an estimated \$110.8 million to the overall economy of the United States.

Table 13 Estimated total economic impact (2016)¹⁶

Region of Impact	Multiplier	Millions 2016\$			
		Cordova	Valdez-Cordova CA	Alaska	Total
Ex-Vessel Revenues (2016)	—	\$14.0	\$14.2	\$28.9	\$36.3
Cordova	1.58	\$22.2			
Southeast Alaska	1.57		\$22.2		
	2.08		\$29.5		
Alaska	2.27			\$65.6	
	2.34			\$67.7	
United States	3.05				\$110.8

Similarly, Table 14 shows the estimated total economic impact of the Area E gillnet fishery over the last ten years:

- Area E gillnet fishery ex-vessel revenues from Cordova permit holders contributed an estimated \$324.5 million in total economic impact for Cordova.
- Area E gillnet fishery ex-vessel revenues from VCCA permit holders contributed an estimated \$328.3–\$434.9 million in total economic impact for the Southeast Region of Alaska.
- Area E gillnet fishery ex-vessel revenues from Alaska permit holders contributed an estimated \$887.8–\$915.2 million in total economic impact for Alaska.
- Total Area E gillnet fishery revenues contributed an estimated \$1.5 billion to the overall economy of the United States.

¹⁶ Source of multipliers listed from top to bottom: 1.58 (McDowell Group 2015); 1.75 (McDowell Group 2017); 2.08 (TCW Economics 2010); 2.27 (ISER 2013); 2.34 (McDowell Group 2017); 3.05 (ISER 2013).

Table 14 Estimated total economic impact (2007-2016)

Region of Impact	Multiplier	Millions 2016\$			
		Cordova	CA	Alaska	Total
Ex-Vessel Revenues (2007-2016)	—	\$205.4	\$209.1	\$391.1	\$491.8
Cordova	1.58	\$324.5			
Southeast Alaska	1.57		\$328.3		
	2.08		\$434.9		
Alaska	2.27			\$887.8	
	2.34			\$915.2	
United States	3.05				\$1,500.0

6.1. ADDITIONAL BENEFITS TO CORDOVA

As mentioned previously, CFEC data break out ex-vessel revenue by location based on the registered addresses of permit holders—which does not account for that fact that many permit holders who do not live in Cordova do spend time (and money) there during the fishing season.

We used anecdotal evidence to approximate the additional benefits of the Area E gillnet fishery to Cordova though additional spending by non-Cordova permit holders during the fishing season. In order to do this, two key pieces of information were needed — the average annual spending per permit holder and the average number of non-Cordova residents that homeport in Cordova for the fishing season.

Due to time constraints, we relied on a focus group of individuals working in (or in industries related to) the Area E gillnet fisheries. Furthermore, the focus group was comprised of both Cordova residents and non-residents. Based on the information provided by the focus group, we estimated that the average non-Cordova drift gillnet permit holder who home ports in Cordova spends \$31,550 in Cordova annually. This estimate includes: \$1,300 – moorage; \$500 – storage; \$10,000 – fuel; \$4,000 – meals; \$4,000 – repairs and maintenance (barring major repairs); \$7,000 – supplies (assuming one net purchase); \$3,750 – housing; and \$1,000 – utilities.

In 2016, there were 537 gillnet and 29 set permanent permits issued. Set gillnet permit holders were removed from the analysis as their expenses are quite different, and they typically do not fish in the Copper River District¹⁷. Of the 537 drift gillnet permits, 229 are held by individuals registered in Cordova—leaving 308 non-residents. Tony Schinella, Harbormaster in Cordova, estimated that a conservative estimate would be that 200 of these would, on average, homeport in Cordova for the season.¹⁸

Using these estimates, Area E non-resident permit holders would have spent approximately \$6.3 million in Cordova during the 2016 fishing season.

Table 15 summarizes the ex-vessel revenues of local residents and estimated spending by non-residents for 2016. This result provides an estimate of total direct spending related to the Area E gillnet fishery, which is

¹⁷ Christa Hoover. Personal communication. 30 October 2017.

¹⁸ Tony Schinella. Personal communication through Christa Hoover. 30 October 2017.

then combined with the multiplier to create an estimate of total overall impact—an estimated \$32.1 million in 2016.

Table 15 2016 estimated total economic impact – Cordova only

Region of Impact	Multiplier	Millions 2016\$			Total w/ Multiplier Effect
		Ex-Vessel Revenues	Non- Resident Spending	Total Direct	
Cordova	1.58	\$14.0	\$6.3	\$20.3	\$32.1

Similarly, additional impacts derived from non-resident spending could (and should) also be estimated for the Valdez-Cordova Census Area and Alaska, but we do not attempt to calculate these here as time constraints prevented the collection of necessary data.

7. CONCLUSIONS

Key findings from this study are as follows:

- In 2016, the estimated value Area E drift and set gillnet permits totals almost \$90 million dollars. Alaska residents hold 77.0% of these permits and 41.2% are held by residents of Cordova.
- A recent study by Wood (2017) of Bristol Bay gillnet fishery permit values found that “total earnings have a positive and significant relationship with permit prices, and total costs have a negative and significant relationship in both the short- and long-run”¹⁹ — suggesting that permit holders individual finances and economic behavior may not only be affected by their annual earnings in the fishery, but also by how the fishery does as a whole.
- Over the last ten years, ex-vessel revenues from the Area E gillnet fishery totaled almost half a billion dollars, with average annual revenues of just under \$50 million. Alaska and Cordova residents earned 79.5% (\$391.1 million) and 41.8% (\$205.4 million) of these ex-vessel revenues.
- In 2016, the Area E gillnet fishery accounted for an estimated \$20.3 million in direct economic benefits (i.e., ex-vessel revenues of residents and spending by non-residents who season there) and \$32.1 million (including harvesting and processing) in total economic impact for Cordova.
- In 2016, the Area E gillnet fishery accounted for an estimated \$36.3 million in direct economic benefits (i.e., ex-vessel revenues) and \$65.6–\$67.7 million (including harvesting and processing) in total economic impact for Alaska.
- From 2007-2016, the Area E gillnet fishery accounted for an estimated \$491.8 million in direct economic benefits (i.e., ex-vessel revenues) and \$887.8–\$915.2 million (harvesting and processing) in total economic impact for Alaska.

¹⁹ Wood, MD. 2017.



7.1. LIMITATIONS

The following limitations of the study should be noted:

- This analysis relies on the best available data from existing, publically available sources and targeted focus groups.
- This analysis does not include economic impacts associated with the Prince William Sound sport, personal use or subsistence salmon fisheries.
- This analysis does not include estimates of multiplier benefits associated with employment or personal income.
- Residency is based on the address a permit holder registers with the CFEC.



The Economic Value of Alaska's Seafood Industry

Prepared for:



Alaska Seafood Marketing Institute

Prepared by:



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McDOWNEY GROUP

September 20



The Alaska Seafood Marketing Institute (ASMI) is a public-private partnership between the State of Alaska and the Alaska seafood industry established to foster economic development of Alaska's most valuable renewable natural resource.



Alaska Seafood Marketing Institute

ASMI's mission is to increase the economic value of the Alaska seafood resource, benefitting thousands of Alaskans in communities across the state.

ASMI activities include Alaska seafood branding campaigns, collaborative marketing programs, technical support, education, advocacy, and research.

ASMI is funded by an industry-directed 0.5% marketing tax based on the export value of Alaska seafood, USDA funding supporting American export industries, and matching funds from the State of Alaska. ASMI employs 19 full-time staff and a number of contractors to fulfill its mission.

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INTRODUCTION

This report updates and builds on prior studies published in 2013 and 2015. ASMI contracted with McDowell Group to update the economic impact of Alaska's commercial seafood industry. The analysis quantifies the regional, statewide, and national economic impacts of Alaska's seafood industry. This report summarizes overall industry participation, value, and exports. It also highlights the significant impact the industry has on tax revenues, investment and charitable giving by the industry, and the value of industry assets.

As the brand manager for Alaska seafood, ASMI recognizes the need to inform the general public and consumers about the important economic benefits of the industry. Alaska's seafood industry covers vast areas of the state but is not always well represented in traditional employment data sources.

Due to biological and environmental factors, harvest of wild seafood is inherently volatile. For example, total odd-year harvests of Alaska pink salmon can be double or triple even-years. In order to reduce this volatility, most figures have been averaged or otherwise combined from the two most recent years (2015-2016) where appropriate.

This report considers only the commercial seafood industry and does not address economic impacts stemming from recreational, charter, or subsistence uses of Alaska's seafood resources.

DATA SOURCES & METHODS

McDowell Group worked with the Alaska Fisheries Information Network (AKFIN), Alaska Department of Fish & Game, and Alaska Department of Labor & Workforce Development to compile customized data sets for this project. The assistance of these agencies was crucial in providing a wide array of primary data sets which McDowell Group used to model direct and secondary impacts. Customized economic models were developed using IMPLAN, industry interviews, and other public data sources. All photos are courtesy of ASMI, except where noted.

GLOSSARY

Direct Impacts: The impacts occurring in the seafood industry itself, including commercial fishing, seafood processing, and direct support sectors.

Direct Support Sectors: Critical support positions are counted as direct impacts in this analysis, such as fishery managers, hatchery workers, and safety personnel.

Secondary Impacts: Additional economic impacts resulting from business and household spending related to the Alaska seafood industry (i.e. multiplier effects).

FTE (full-time equivalent): Many seafood industry workers are employed in seasonal jobs or earn a year's worth of income in less than a year. FTE employment figures in this report represent an annualized estimate of jobs created in each study area, allowing comparison to other industries.

Labor Income: Wages, salaries, bonuses, and benefit payments to seafood industry participants.

Economic Output: The value added to Alaska's seafood in total, and at various stages of the production and supply chain.

Ex-Vessel (EV) Value: The dollar amount received by fishermen for their catch when delivered to a processor. This includes both initial payments and any bonuses or year-end adjustments paid by processors.

First Wholesale (FW) Value: The value of seafood products when sold to buyers outside a processor's affiliate network. This is the value of the raw fish delivered to the processor (ex-vessel value) plus the value added by the first processor.

Worker Counts: The total number of people directly earning income in the industry. Processing worker counts reflect people who earned the majority of the earnings as processing workers, while commercial fishing worker counts include all adult participants.



EXECUTIVE SUMMARY

The Seafood Industry: A Cornerstone of Alaska's Economy



Approximately 56,800 workers are directly employed by Alaska's seafood industry, including 26,500 Alaska residents. Seafood directly created an estimated 26,800 full-time equivalent (FTE) jobs in Alaska during 2015/2016, and a total of 36,800 FTE jobs in Alaska including multipliers, or about 8 percent of total statewide employment.



Alaska fisheries employed an average of 29,200 commercial fishermen in 2015/2016, including 16,500 Alaska residents. Alaska's commercial fleet includes approximately 9,400 vessels, which would span just over 70 miles if lined up from bow to stern. Lower resource value has contributed to a downward trend in fishing employment since 2013.



Alaska's 2016 seafood harvest of 5.6 billion pounds had a total ex-vessel value of \$1.7 billion. Processors produced 2.7 billion pounds of Alaska seafood products in 2016, worth a first wholesale value of \$4.2 billion.



The processing sector employed an average of 24,500 workers in 2015/2016, including an estimated 7,200 Alaska residents. The industry includes 169 shore-based plants, 73 catcher-processors, and more than a dozen floating processors in 2016.

Seafood Industry Impact on Alaska's Economy, 2015/2016 Avg.

Direct Impacts	Number of Workers	Labor Income (\$Millions)
Commercial Fishing	29,200	\$824
Processing	24,500	\$467
Management/Hatcheries/Others	3,200	\$228
Total	56,800	\$1,518

Note: Figures may not sum due to rounding.

Total FTE Jobs by Region

BSAI	10,400
Southeast	8,200
Southcentral	6,700
Kodiak	5,900
4,400	Bristol Bay
900	Arctic-Yukon-Kuskokwim



The Significant National Economic Impact of Alaska's Seafood Industry

- Nationally, the Alaska seafood industry creates an estimated 99,000 FTE jobs, \$5.2 billion in annual labor income, \$12.8 billion in economic output.
- The national economic impacts of Alaska's seafood industry includes \$5.4 billion in direct output associated with fishing, processing, distribution, and retail. It also includes \$7.3 billion in multiplier effects generated as industry income circulates throughout the U.S. economy.
- The Alaska seafood industry employed a total of 29,600 residents from other U.S. states who came north to work in Alaska during 2016.
- Alaska exports more than one million metric tons of seafood each year, bringing over \$3 billion of new money into the U.S. economy.



Feeding the World and Alaska's Economy with Sustainable Fisheries

- Alaska's abundant commercial fisheries have produced over 169 billion pounds since statehood in 1959. The largest harvest ever occurred in 2015 (6.1 billion pounds). A commitment to sustainable management has allowed the state's fisheries to produce large, diversified harvests for many decades.
- The scale of Alaska's commercial fisheries are truly extraordinary. The industry catches and processes enough seafood each year to feed everybody in the world at least one serving of Alaska seafood, or one serving for every American for more than a month (12.9 billion servings in 2015).
- Alaska seafood was sold in 105 countries around the world in 2016. Export markets typically account for approximately two-thirds of sales value, while the U.S. market buys the remaining one-third.
- Seafood directly employs more workers than any other industry in Alaska, and is the third-largest overall job creator in the state next to the oil/gas and visitor industries (including multiplier effects).
- Seafood is the economic foundation of many rural communities. Over 21,200 rural Alaska residents were directly employed by the industry in 2015, accounting for 15% of all rural working age adults.





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Seafood Industry Overview

COMMERCIAL FISHING SECTOR

Alaska has the most prolific commercial fishing industry in the United States, producing more harvest volume than all other states combined. Commercial fishing in Alaska creates substantial benefits for Alaska’s economy and provides consumers around the world with a wild, sustainable product.

Alaska’s commercial fishing industry is very diverse. Crews range from one or two fishermen working from skiffs and small boats to large catcher-processors in excess of 300 feet with 100 workers or more.

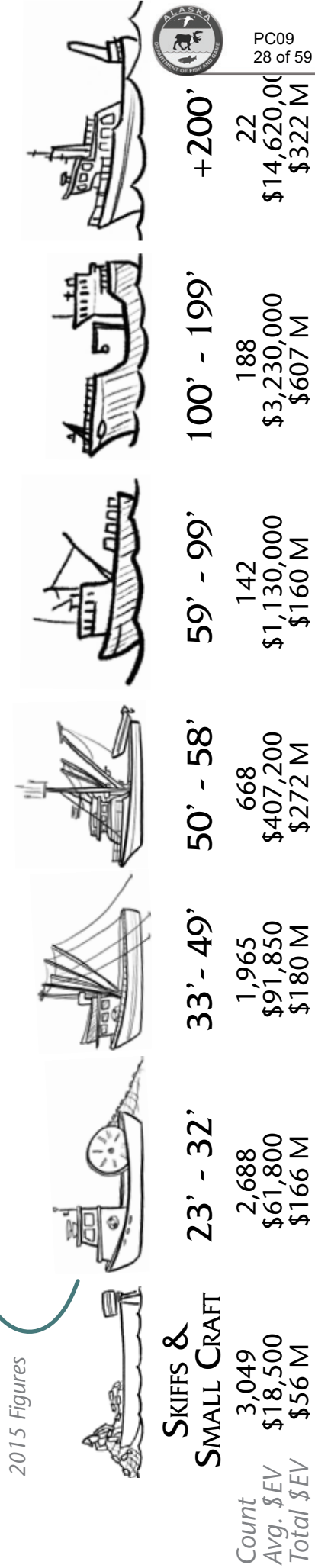
Fishermen involvement in the industry also spans a wide spectrum. Many skippers and crew participate in multiple fisheries as a full-time career, while others fish to supplement income from other jobs, earn money during a summer school break, or work as crew members for friends and family to be part of a uniquely Alaskan cultural tradition.

Regardless of vessel size or involvement, each fishing operation represents a business generating new income from a renewable resource. These businesses spend money throughout the economy, and provide the raw materials on which the rest of the seafood economy is based.

Key Figures		2016
Skippers & Crew		27,738
Skippers		9,125
Crew		18,613
Alaska Residents		15,592
Fishing & Related Vessels		9,423
Total Length of All Vessels		70.6 mi.
Ex-Vessel Value (\$Millions)*		\$1,671
Percent to AK Residents*		38%
Harvest Volume (Millions lbs.)*		5,643

*Figures are preliminary.

If all the vessels used in the Alaska seafood industry were lined up bow to stern they would stretch on for nearly 71 miles!



Note: Vessel figures by size only include those which made landings in 2015, and therefore do not include other support or processing vessels. Skiffs and small craft may be understated in the data above, as smaller net boats are not required to be registered with the State and vessel identification numbers are not always recorded on setnet fish tickets.

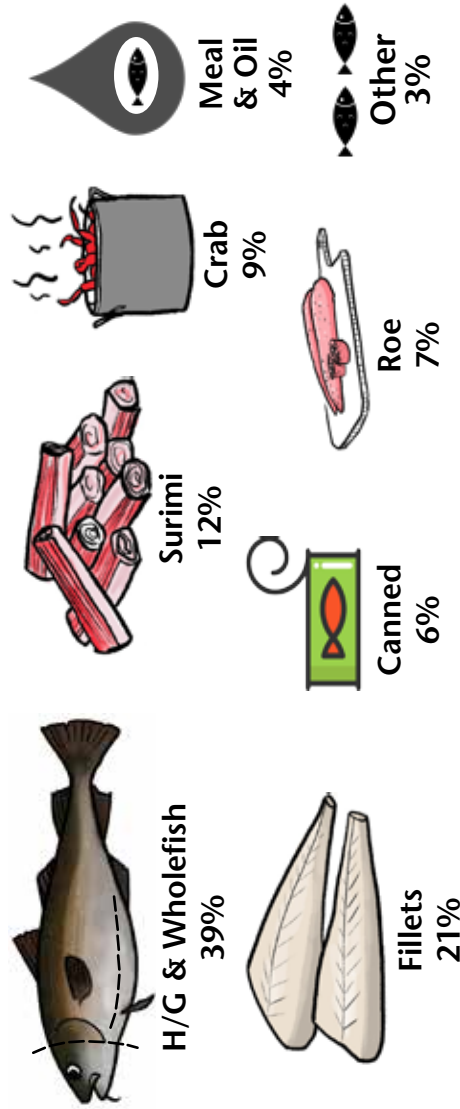
SEAFOOD PROCESSING SECTOR

Seafood processing is the largest manufacturing sector in Alaska, accounting for 72% of the state's manufacturing employment. Nearly all of Alaska's seafood products go through the hands of seafood processors, which add value by turning raw fish and shellfish into a myriad of products for markets around the world.

The seasonality of many Alaska fisheries, especially salmon, result in a reliance on nonresident workers to fully staff production jobs at remote sites across the state. Though nonresidents comprise approximately 70% of the workforce, residents earn a higher share of the sector's income as they are more likely to be employed in management and maintenance positions and work in areas with longer operating seasons. Approximately 1-in-10 resident workers earned over \$50,000 in 2016.

The sector includes 169 shore-based plants, 73 catcher-processors, and more than a dozen floating processors.

First Wholesale Value by Product Type, 2015/2016



First Wholesale Value by Species, 2015/2016

33% Pollock
33% Salmon
11% Cod
5% Halibut & Black Cod

Workforce		2016
Peak Monthly Employment		20,224
Avg. Monthly Employment		9,750
Workers in Alaska (2015)		24,863
Alaska Resident Estimate		7,409
Total Workforce Earnings		\$438 Million
Alaska Resident Estimate		\$154 Million
Value Added		2016
Ex-Vessel Value		\$1,671 Million
First Wholesale Value		\$4,186 Million
Value Added by Processors		\$2,515 Million
FW Value by Type		2016
Shoreside Plants		\$2,577 Million
Catcher-Processors		\$1,289 Million
Floating Processors		\$323 Million



COMMERCIAL FISHERIES MANAGEMENT

Alaska's fisheries are known worldwide as a model for sustainable management. The efforts of the region's biologists, managers, and policy makers ensure healthy stocks and productive fisheries for Alaska's harvesters and the businesses that rely on their catches. A key aspect of Alaska's successful model is the separation of entities that set policy (**Alaska Board of Fisheries and North Pacific Fishery Management Council**) and those that enforce and study allocations and harvest limits.

Alaska's commercial fisheries are managed by the **Alaska Department of Fish and Game (ADF&G)** and the **National Marine Fisheries Service (NMFS)**, a division of NOAA. With some exceptions, fisheries managed by ADF&G occur within three miles of Alaska's coast while NMFS manages offshore fisheries. Both agencies work in coordination to conserve and develop Alaska's fishery resources.

Some Alaska fisheries have an international component. Pacific halibut fisheries are jointly managed with Canada via the **International Pacific Halibut Commission**. Transboundary salmon harvests in Southeast Alaska and the Yukon River are subject to the **Pacific Salmon Treaty**.

The State of Alaska has several agencies that further support the seafood industry in Alaska:

- The **Commercial Fisheries Entry Commission** implements Alaska's limited entry law by issuing the fishing permits for state fisheries whereas NMFS issues permits for the federal fisheries.
- The **Department of Environmental Conservation** issues discharge permits for seafood processing facilities.
- The **Department of Commerce, Community, and Economic Development** is charged with promoting economic development in Alaska, including the seafood industry.

- The **Alaska Seafood Marketing Institute** is a public-private partnership between the state and the seafood industry with the mission to increase the economic value of Alaska seafood.

- The State also provides training opportunities and extension services through the **University of Alaska system, Alaska Sea Grant, and Alaska's Institute of Technology (AVTEC)**.





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Economic Impacts of Alaska Seafood

ECONOMIC IMPACTS BY SPECIES

Estimated Contributions to the
National Economy
(2015-2016 Averages)



Salmon	
Direct Total	
FTE Jobs	16,400
Labor Income \$M	\$735
Value Added \$M	\$1,803
Secondary Total	
FTE Jobs	16,600
Labor Income \$M	\$977
Value Added \$M	\$2,422
Total Contribution	
FTE Jobs	32,900
Labor Income \$M	\$1,712
Value Added \$M	\$4,225



Halibut & Black Cod	
Direct Total	
FTE Jobs	3,800
Labor Income \$M	\$157
Value Added \$M	\$381
Secondary Total	
FTE Jobs	3,500
Labor Income \$M	\$206
Value Added \$M	\$512
Total Contribution	
FTE Jobs	7,300
Labor Income \$M	\$363
Value Added \$M	\$893



Crab	
Direct Total	
FTE Jobs	5,900
Labor Income \$M	\$244
Value Added \$M	\$591
Secondary Total	
FTE Jobs	5,400
Labor Income \$M	\$320
Value Added \$M	\$795
Total Contribution	
FTE Jobs	11,300
Labor Income \$M	\$564
Value Added \$M	\$1,386



Alaska Pollock	
Direct Total	
FTE Jobs	13,800
Labor Income \$M	\$655
Value Added \$M	\$1,616
Secondary Total	
FTE Jobs	14,900
Labor Income \$M	\$875
Value Added \$M	\$2,171
Total Contribution	
FTE Jobs	28,700
Labor Income \$M	\$1,530
Value Added \$M	\$3,787



Pacific Cod	
Direct Total	
FTE Jobs	5,700
Labor Income \$M	\$256
Value Added \$M	\$627
Secondary Total	
FTE Jobs	5,800
Labor Income \$M	\$340
Value Added \$M	\$843
Total Contribution	
FTE Jobs	10,900
Labor Income \$M	\$580
Value Added \$M	\$1,470



Other Groundfish	
Direct Total	
FTE Jobs	2,700
Labor Income \$M	\$136
Value Added \$M	\$339
Secondary Total	
FTE Jobs	3,100
Labor Income \$M	\$184
Value Added \$M	\$456
Total Contribution	
FTE Jobs	5,800
Labor Income \$M	\$320
Value Added \$M	\$796

- Salmon is still king in Alaska. By all measures, salmon are responsible for the greatest economic impact (jobs, income, and total value) among all species in the Alaska seafood industry. Salmon's total contribution to the national economy included approximately 32,900 FTE jobs and \$1.7 billion in annual labor income in 2015/2016.
- As the largest single species U.S. fishery, by volume, Alaska pollock is a close second. Much of pollock's value is added through processing, which occurs both shoreside and at-sea. Pollock's national economic impact includes an estimated 28,700 FTE jobs and \$1.5 billion in labor income.
- Halibut, black cod, and crab are high-value species. Despite only accounting for 2 percent of harvest volume, the three species account for 19 percent of the labor income and economic output (including multiplier effects) produced by the Alaska seafood industry.



ALASKA STATEWIDE IMPACTS

Seafood Industry Impact on Alaska's Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	29,200	13,700	\$824	\$1,738
Processing	24,500	10,800	\$467	\$2,446
Mgmt./Other	3,200	2,300	\$228	-
Direct Total	56,900	26,800	\$1,518	\$4,184
Secondary Total	-	10,000	\$441	\$979
Total Impacts	-	36,800	\$1,959	\$5,163

- In total, seafood contributed 31,900 FTE jobs and \$1.8 billion of labor income annually to the state's economy during 2015 and 2016. It is estimated that the commercial seafood industry accounted for 7.2 percent of statewide employment during this period.
- The seafood industry directly employs nearly 60,000 workers in Alaska each year. Through business and household spending, it is estimated the industry created an additional 8,800 jobs and \$385 million of secondary labor income, on average, in 2015 and 2016.
- Seafood contributed an annual average of \$5.0 billion in economic output to the Alaska economy in 2015 and 2016.
- The seafood industry directly employs more workers than any other private sector industry. Including multiplier effects, it is the third-largest basic sector job creator in Alaska after the oil-and-gas and visitor industries.
- The seafood industry directly employed an estimated 26,000 Alaska residents per year in 2015/2016.
- The economic benefits of the seafood industry are broadly distributed across Alaska, from Kotzebue to Ketchikan.


Top Ports: by First Wholesale Value*

- 1) Dutch Harbor \$474 Million
- 2) Naknek \$292 Million
- 3) Kodiak \$262 Million
- 4) Cordova \$134 Million
- 5) Sitka \$121 Million

*2015/2016 Avg.

Total Jobs & Income Created by Basic Sector Industries in Alaska

Oil & Gas

 103,900 jobs
\$6.0 Billion

Seafood

 36,800 jobs
\$2.0 Billion

Visitor



39,700 jobs
\$1.4 Billion

Mining



8,600 jobs
\$675 Million

Basic sectors bring new income into the economy. The industries above drive Alaska's economy, collectively accounting for approximately 40% of total employment in Alaska.



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Note: Figures shown above include multiplier effects.
Source: McDowell Group economic impact studies (2016-2017).

Harvesting

Processing



6,548

Resident Owned
Fishing Vessels



15,592

Resident
Fishermen



169

Shore-based
Processing Facilities



24,863

Processing
Workers
(2015)



\$1,671 Million

Harvest
Value
Million Pounds of
Seafood Harvested



5,643



\$4,186 Million

Wholesale
Value
Million Pounds
of Seafood
Produced

Bristol Bay setnetters Ryan Hanley, Neil Gotschall, and Lauren Stanford. Photo credit: Neil Gotschall.

Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	17,147	17,682	17,817	17,809	17,701	17,339	15,486
Gross Earnings (\$Millions)**	\$721	\$876	\$806	\$834	\$741	\$677	\$627
Average Processing Employment*	9,162	10,130	10,198	10,477	10,596	10,147	9,777
Peak Processing Employment*	18,871	20,328	19,472	20,367	20,788	20,534	20,202
Wages/Salaries (\$Millions)*	\$316	\$349	\$364	\$392	\$399	\$439	\$434
Harvest Value (\$Millions)**	\$1,713	\$2,186	\$2,147	\$2,050	\$1,957	\$1,805	\$1,616
First Wholesale Value (\$Millions)**	\$3,856	\$4,609	\$4,508	\$4,559	\$4,304	\$4,277	\$4,119

*Figures may not include processing activity from catcher/processor vessels. **2016 is preliminary.



Value & Volume of Key Species, 2015/2016 Avg.

Pollock



\$448
EV VALUE
\$MILLIONS

3.31
HARVEST
#BILLIONS

\$1.41
FW VALUE
\$BILLIONS

\$0.43
FW VALUE PER
ROUND LB.

Salmon



\$418
EV VALUE
\$MILLIONS

792
HARVEST
#MILLIONS

\$1.36
FW VALUE
\$BILLIONS

\$1.72
FW VALUE PER
ROUND LB.

Crab



\$249
EV VALUE
\$MILLIONS

83
HARVEST
#MILLIONS

\$370
FW VALUE
\$MILLIONS

\$4.46
FW VALUE PER
ROUND LB.

Cod



\$178
EV VALUE
\$MILLIONS

702
HARVEST
#MILLIONS

\$473
FW VALUE
\$MILLIONS

\$0.67
FW VALUE PER
ROUND LB.

Halibut & Black Cod



\$204
EV VALUE
\$MILLIONS

46
HARVEST
#MILLIONS

\$231
FW VALUE
\$MILLIONS

\$5.02
FW VALUE PER
ROUND LB.

A80 Species
(Flatfish, Rockfish, &
Atka Mackerel)



\$131
EV VALUE
\$MILLIONS

780
HARVEST
#MILLIONS

\$328
FW VALUE
\$MILLIONS

\$0.42
FW VALUE PER
ROUND LB.

Percent of Ex-Vessel Value & Volume, 2015/2016

Species	Value	Volume
Pollock	27%	57%
Salmon	25%	14%
Crab	15%	1%
Cod	11%	12%
Halibut & Black Cod	12%	1%
A80 Species	8%	13%
Other Species	2%	2%

Ex-Vessel Value & Volume by Fishery Region, 2015/2016

20%
VALUE

4%
VOLUME

Southeast

17%
VALUE

4%
VOLUME

Southcentral

6%
VALUE

9%
VOLUME

Kodiak

35%
VALUE

77%
VOLUME

BSAI

17%
VALUE

4%
VOLUME

Bristol Bay

1%
VALUE

<1%
VOLUME

AYK



Regional Employment Impacts

Economic benefits created by the seafood industry are widely distributed across Alaska. The species to the left drive these benefits. High volume whitefish account for roughly 80% of Alaska's harvest volume and nearly half of the industry's ex-vessel value (the amount paid to fishermen by processors). Salmon and high-value species such as halibut, black cod, and crab account for less than 20% of the harvest volume, but comprise over half of the industry's ex-vessel value.



Note: The number of seafood workers shown above represents the estimated number of direct seafood workers employed in each region on average during 2015/2016, while the total FTE jobs represents the number of full-time equivalent jobs supported by seafood in each region including multiplier effects.



ARCTIC-YUKON-KUSKOKWIM REGION

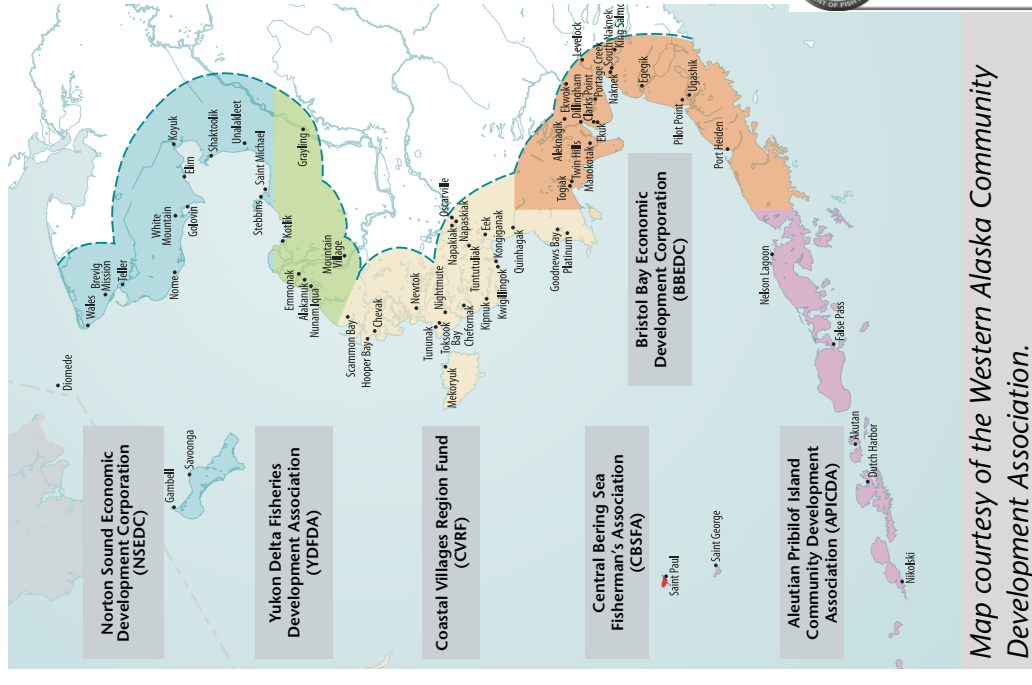
Seafood Industry Impact on Regional Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	2,300	100	\$7	\$11
Processing	800	400	\$9	\$10
Mgmt./Other	100	100	\$5	-
Direct Total	3,300	600	\$21	\$20
Secondary Total	-	300	\$14	\$29
Total Impacts	-	900	\$36	\$49

- Total annual seafood industry-related labor income in the AYK region is estimated at approximately \$36 million and the total regional economic impact is measured at \$49 million.
- Commercial fisheries are an important source of cash income in remote Western Alaska communities. Seasonal income from seafood supports subsistence lifestyles for many AYK families.
- Lower salmon prices have hit AYK especially hard. Commercial salmon fishing on the Kuskokwim river has been effectively closed for the past two years (2016/2017) due to lack of buyers, putting nearly 400 boats out of business.
- AYK has a unique collection of fisheries that reflect the resourcefulness of its residents. Virtually all salmon are caught with setnets or fishwheels, king crab pots in Norton Sound are hauled up through ice holes, and it is the only region in the state where lamprey are harvested.
- AYK is home to three (of the six) CDQ entities. CDQ groups, which own several processing plants, shares of many vessels, and fund community development/assistance programs, are among the largest private sector employers in the region.

Key Ports:

Emmonak Savoonga
Unalakleet Nome Quinhagak



Map courtesy of the Western Alaska Community Development Association.

Harvesting



623

Resident-owned
Fishing Vessels



2,240

Resident
Fishermen

\$112 Million

Harvest
Value

14.0

Million Pounds
of Seafood
Harvested



6

Shore-based
Processing Facilities



1,055

Shore-side
Processing
Workers
(2015)

\$222 Million

Wholesale
Value

7.2

Million Pounds
of Seafood
Produced

0.7% of Alaska Total

0.5% of Alaska Total

AYK setnet fishermen display their catch (above). Salmon account for most of the region's ex-vessel value, but there are also fisheries for red king crab, halibut, Bering cisco, and lamprey.

AYK Region CDQ Group

Communities (Residents)

Net Assets (2015)

NSEDC

15 (9,300)

\$207 million

YDFDA

6 (3,400)

\$87 million

CVRF

20 (9,400)

\$257million

Regional Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	3,274	3,351	3,406	3,526	3,364	3,177	2,240
Gross Earnings (\$Millions)*	\$18	\$21	\$19	\$18	\$21	\$16	\$18
Average Processing Employment	265	191	341	351	354	452	354
Peak Processing Employment	898	684	1,089	1,203	1,132	1,138	1,089
Wages/Salaries (\$Millions)	\$5.6	\$4.6	\$10.4	\$10.9	\$11.6	\$21.7	\$21.7
Regional Harvest Value (\$Millions)*	\$10	\$12	\$11	\$12	\$13	\$9	\$9
First Wholesale Value (\$Millions)*	\$18	\$20	\$19	\$21	\$21	\$19	\$19

*2016 data is preliminary.



BRISTOL BAY REGION

Seafood Industry Impact on Regional Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	8,000	2,300	\$105	\$159
Processing	4,200	1,200	\$52	\$316
Mgmt./Other	200	100	\$5	-
Direct Total	12,400	3,500	\$162	\$475
Secondary Total	-	800	\$35	\$71
Total Impacts	-	4,400	\$197	\$547

Top Port: Naknek \$292M*

Other Key Ports:

Dillingham Egegik \$35M* Togiak
Port Moller Ekuk

*Avg. 2015/2016 FW Value.

- Commercial fisheries in the Bristol Bay region directly employ 12,400 people and generate \$162 million in labor income.
- Bristol Bay is a unique region when it comes to seafood. While other regions rely on a diverse portfolio of species, virtually all of Bristol Bay's value comes from sockeye and production is generally limited to June-July.
- The region accounted for 44 percent of the world's sockeye harvest over the past 25 years. The 134-year old fishery produced its 2 billionth salmon in 2016.
- Over 1,440 Alaska residents own Bristol Bay commercial salmon fishing permits. Resident permit ownership is split almost evenly between regional residents and other Alaskans.
- Bristol Bay sockeye has successfully reinvented itself over the past couple decades. Historically, most fish was either canned or sold to Japan as a frozen H&C product. Now, the fishery's products and markets are much more diversified.



Crew of the F/V Maggie, a Bristol Bay gillnetter owned by Lyle Wilder of Port Alsworth, Alaska.

Bristol Bay Region includes: Bristol Bay Borough, Dillingham Census Area, and Lake and Peninsula Borough (less Chignik area communities).



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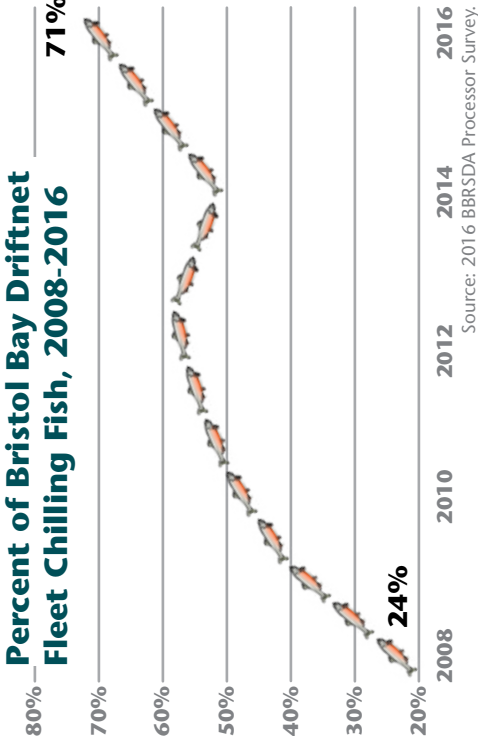
Share of Regional Ex-Vessel Value, 2015/2016



97%
Sockeye Salmon

3%
All Other Species

Bristol Bay fishermen have invested millions of dollars to improve fish quality through on-board chilling systems. These investments create jobs for refrigeration equipment manufacturers, supply companies, installation technicians, and others.



2016 Figures

Harvesting



512
Resident-owned
Fishing Vessels

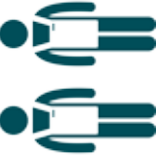


1,576
Resident
Fishermen

Processing



26
Shore-based
Processing Facilities



4,157
Shore-side
Processing
Workers
(2015)

\$525 Million
Wholesale
Value

180
Million Pounds
of Seafood
Produced

11% of Alaska Total

13% of Alaska Total

Bristol Bay
Salmon
Fisheries

*Gear Type**
Harvest Value
Permits Fished

Driftnet
\$115 Million
1,542

Setnet
\$25 Million
872

* 2015/2016 Avg.

Regional Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	1,506	1,598	1,654	1,609	1,663	1,607	1,576
Gross Earnings (\$Millions)*	\$18	\$28	\$24	\$26	\$36	\$20	\$22
Average Processing Employment	1,401	1,535	1,514	1,514	1,542	1,095	1,411
Peak Processing Employment	5,257	5,460	5,037	5,312	5,374	4,309	5,111
Wages/Salaries (\$Millions)	\$46	\$53	\$47	\$51	\$54	\$49	\$51
Regional Harvest Value (\$Millions)*	\$171	\$170	\$151	\$157	\$224	\$127	\$127
First Wholesale Value (\$Millions)	\$459	\$404	\$329	\$359	\$449	\$426	\$426

*2016 data is preliminary.



BERING SEA & ALEUTIAN ISLANDS REGION

Seafood Industry Impact on Regional Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	4,600	4,600	\$441	\$991
Processing	8,600	4,700	\$227	\$1,494
Mgmt./Other	400	200	\$21	-
Direct Total	13,500	9,500	\$689	\$2,485
Secondary Total	-	800	\$36	\$74
Total Impacts	-	10,400	\$725	\$2,559

Top Port: Dutch Harbor \$474M*

Other Key Ports: Akutan

King Cove St. Paul Island \$74M*

Sand Point False Pass

Adak Atka

*Avg. 2015/2016 FW Value.

- The BSAI region accounts for 59 percent of the industry's first wholesale value (2015/2016).
- BSAI commercial fisheries created 10,400 FTE jobs and \$725 million of labor income in 2015/2016.
- The resident population in the BSAI region is approximately 8,500, far too small to catch, cut, and ship the region's vast seafood resources. As a result, most seafood workers come from the lower 48 or elsewhere in Alaska to work in the industry.
- Dutch Harbor is consistently the nation's top seafood port by volume, and second-largest in terms of ex-vessel value. In 2015, the port took in 787 million pounds of seafood - an average of 15.2 million pounds per week.
- Western Alaska residents also benefit from the Community Development Quota (CDQ) program, which allocates approximately 10 percent of groundfish and crab quotas to six regional entities. These groups collectively held nearly a billion dollars in net assets as of 2015.



The C/P Starbound is one of 17 AFA Catcher Processors vessels operating in the Bering Sea. AFA CPs primarily target pollock and can have crews of 100 or more. The Starbound was lengthened 60' in 2015 to accommodate a fish meal plant and other upgrades.

BSAI Region includes: Aleutians East Borough and Aleutians West Census Area.



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42%
Pollock



23%
King, Snow, &
Tanner Crab



16%
Pacific Cod



3%
Halibut & Black Cod



6%
Flatfish
(Sole & Flounder)



3%
Atka Mackerel &
Other Species



4%
All Salmon

Harvesting



240
Resident-owned
Fishing Vessels



538
Resident
Fishermen



21
Shore-based
Processing Facilities



6,411
Shoreside
Processing
Workers
(2015)

\$943 Million
Harvest
Value

4,523
Million Pounds
of Seafood
Harvested

\$2,538 Million
Wholesale
Value

1,994
Million Pounds
of Seafood
Produced

56% of Alaska Total

61% of Alaska Total

**Regional Shoreside vs. At-Sea
Round Processed lbs. (Millions)**

FW Value (\$Millions)

Shoreside

658

\$1,067

At-Sea

1,336

\$1,471

Regional Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	738	729	727	700	667	677	538
Gross Earnings (\$Millions)**	\$40	\$58	\$45	\$47	\$42	\$50	\$47
Average Processing Employment*	3,360	3,698	3,606	3,712	3,834	3,813	3,917
Peak Processing Employment*	5,121	5,535	5,576	5,557	5,860	5,216	5,817
Wages/Salaries (\$Millions)*	\$113	\$128	\$130	\$137	\$146	\$171	\$212
Regional Harvest Value (\$Millions)**	\$800	\$1,137	\$1,198	\$1,029	\$1,052	\$1,039	\$919
First Wholesale Value (\$Millions)	\$2,020	\$2,667	\$2,712	\$2,371	\$2,435	\$2,432	\$2,517

*Figures may not include processing activity from catcher/processor vessels. **2016 data is preliminary.



KODIAK REGION

Seafood Industry Impact on Regional Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	2,500	1,600	\$67	\$140
Processing	2,900	1,700	\$65	\$161
Direct Support	1,000	800	\$87	-
Direct Total	6,400	4,100	\$219	\$301
Secondary Total	-	1,900	\$79	\$174
Total Impacts	-	5,900	\$297	\$475

Top Port: Kodiak \$262M*

Other Key Ports: Larsen Bay

Alitak Bay Old Harbor Chignik

*Avg. 2015/2016 FW Value.

- Kodiak was the second largest commercial fishing port in the U.S. by volume landed in 2015, and third in terms of ex-vessel value. The industry drives the regional economy and is responsible for much of the region's economic activity and population base.
- Seafood accounts for approximately 40 percent of the region's employment.
- Kodiak's seafood processors employ the highest percentage of local residents of any major production region in Alaska. On average during 2005-2014, 48 percent of processing workers were year-round residents of Kodiak.
- The region tends to have higher rates of resident employment because Kodiak waters produce several commercial species leading to more consistent production throughout the year. As a result, resident processing workers earn a higher share of income and are more likely to work in senior positions.
- The U.S. Coast Guard maintains a large presence in Kodiak, using the community as a staging area for safety and rescue missions in both the Gulf of Alaska and Bering Sea.



Kodiak jig fisherman Dariusz Kasprzak of the FV Marona.



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Kodiak Region includes: Kodiak Island Borough and the communities of Chignik, Chignik Lake, Chignik Lagoon, and Perryville.

Share of Regional Ex-Vessel Value, 2015/2016*



13%
Halibut



11%
Black Cod



14%
Pacific Cod



9%
Flatfish &
Other Species



24%
Pollock



16%
Sockeye Salmon



9%
Pink Salmon



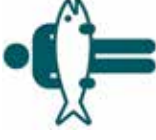
4%
Rockfish

*Common property fisheries only.

Harvesting



469
Resident-owned
Fishing Vessels



1,291
Resident
Fishermen

\$128 Million
Harvest
Value
↓
427
Million Pounds
of Seafood
Harvested

8% of Alaska Total



15
Shore-based
Processing Facilities



2,586
Shoreside
Processing
Workers
(2015)

\$243 Million
Wholesale
Value
↓
208
Million Pounds
of Seafood
Produced

6% of Alaska Total

Regional Salmon Fisheries

Gear Type*
Harvest Value
Permits Fished

Seine
\$30 Million
243

Setnet
\$4.0 Million
146

* 2015/2016 Avg., includes Chignik seine fishery.

Regional Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	1,408	1,529	1,463	1,432	1,342	1,424	1,291
Gross Earnings (\$Millions)**	\$140	\$185	\$166	\$164	\$154	\$134	\$119
Average Processing Employment*	1,724	1,816	1,821	1,799	1,598	1,803	1,519
Peak Processing Employment*	2,094	2,339	2,254	2,480	2,088	2,397	1,919
Wages/Salaries (\$Millions)*	\$70	\$74	\$77	\$73	\$68	\$77	\$77
Regional Harvest Value (\$Millions)**	\$140	\$206	\$192	\$194	\$135	\$153	\$153
First Wholesale Value (\$Millions)	\$322	\$383	\$401	\$436	\$331	\$359	\$359

*Figures may not include processing activity from catcher/processor vessels. **2016 is preliminary.



SOUTHCENTRAL ALASKA

Seafood Industry Impact on Regional Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	6,700	1,900	\$101	\$184
Processing	3,800	1,200	\$51	\$257
Mgmt./Hatcheries	500	300	\$29	-
Direct Total	11,000	3,500	\$180	\$441
Secondary Total	-	3,300	\$161	\$374
Total Impacts	-	6,700	\$342	\$814

- The seafood industry directly employs 11,000 workers and creates approximately 6,700 FTE jobs including multiplier effects (as a result of seafood caught and processed within the region, not including impacts from Southcentral residents bringing home earnings from other Alaska fisheries in other regions).



Southcentral Region includes: Anchorage Municipality, Kenai Peninsula Borough, Matanuska-Susitna Borough, and Valdez-Cordova Census Area.

Regional Ports

	(2015/16 Avg. FW Value)
Cordova	\$134M
Seward	\$83M
Valdez	\$50M
Whittier	Kasilof
	Nikiski
	Anchor Pt.

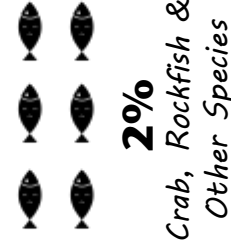
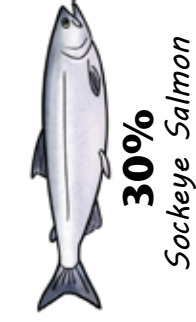
Resident Seafood Workers by Borough or Census Area

Kenai Peninsula Borough	3,796
Anchorage Municipality	2,232
Valdez-Cordova CA	1,031
Mat-Su Borough	697

- 36 percent of Alaska's resident commercial fishermen live in Southcentral, more than any other region.
- Southcentral featured 17 communities with gross resident fishing earnings greater than \$1 million in 2016, and 6 communities with more than \$5 million.
- Limited entry fishing permits and IFQ shares for halibut and black cod owned by Southcentral residents were worth an estimated \$343 million in 2016.
- Regional fishing employment and gross fishing earnings fell sharply in 2016, due to poor salmon runs.
- Southcentral residents earn nearly half of their gross fishing income from fisheries outside the region. Bristol Bay and Kodiak salmon fisheries include many Southcentral residents.
- Anchorage is a critical hub for fresh seafood shipments: seafood workers, and fishery management meetings; a of which benefit the regional economy.



Share of Regional Ex-Vessel Value, 2015/2016*



*Common property fisheries only.

Regional Salmon Fisheries

Gear Type*
Harvest Value
Permits Fished

Driftnet
\$47 Million
999

Seine
\$42 Million
232

Setnet
\$14 Million
558

Total
\$103 Million
1,789

* 2015/2016 Avg.

Harvesting



2,021
Resident-owned
Fishing Vessels

\$150 Million
Harvest
Value



5,557
Resident
Fishermen

136
Million Pounds
of Seafood
Harvested

Processing



51
Shore-based
Processing Facilities

\$375 Million
Wholesale
Value



4,482
Shore-side
Processing
Workers
(2015)

101
Million Pounds
of Seafood
Produced

9% of Alaska Total

9% of Alaska Total

Regional Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	5,592	5,890	5,882	5,808	5,980	5,909	5,557
Gross Earnings (\$Millions)*	\$264	\$306	\$290	\$321	\$274	\$259	\$219
Average Processing Employment	959	1,268	1,320	1,341	1,415	1,238	1,2
Peak Processing Employment	2,873	3,632	3,258	3,167	3,300	3,241	3,5
Wages/Salaries (\$Millions)	\$33	\$32	\$46	\$54	\$51	\$48	\$
Regional Harvest Value (\$Millions)*	\$296	\$272	\$246	\$283	\$209	\$218	\$1
First Wholesale Value (\$Millions)*	\$511	\$429	\$470	\$687	\$488	\$507	\$3

*2016 data is preliminary.



SOUTHEAST ALASKA

Seafood Industry Impact on Regional Economy, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	6,100	2,900	\$121	\$221
Processing	4,100	1,600	\$62	\$228
Direct Support FN	1,100	800	\$80	-
Direct Total	11,300	5,300	\$264	\$449
Secondary Total	-	2,900	\$116	\$257
Total Impacts	-	8,200	\$379	\$706

- Seafood is the largest private sector industry in Southeast Alaska, in terms of workforce size and labor income. Seafood accounted for 15 percent of the regional employment in 2015/2016, including multiplier impacts.
- Southeast residents own more commercial fishing boats and IFQ (individual fishing quota) shares than any other region.
- Seafood is an important part of most local economies in Southeast, but provides an economic foundation for Sitka, Petersburg, Wrangell, Prince of Wales Island, Hoonah, Haines, and Yakutat.



Marsh & Nora Skeele, Sitka Salmon Shares fishermen.

Regional Ports (2015/2016 Avg. FW Value)

Sitka	\$121M	Ketchikan	\$93M
Petersburg	\$83M	Juneau	\$53M
Wrangell		Excursion Inlet	
Craig	\$14M	Yakutat	\$13M
Hoonah	Metlakatla	Haines	
Pelican	Gustavus	Hyder	Klawock

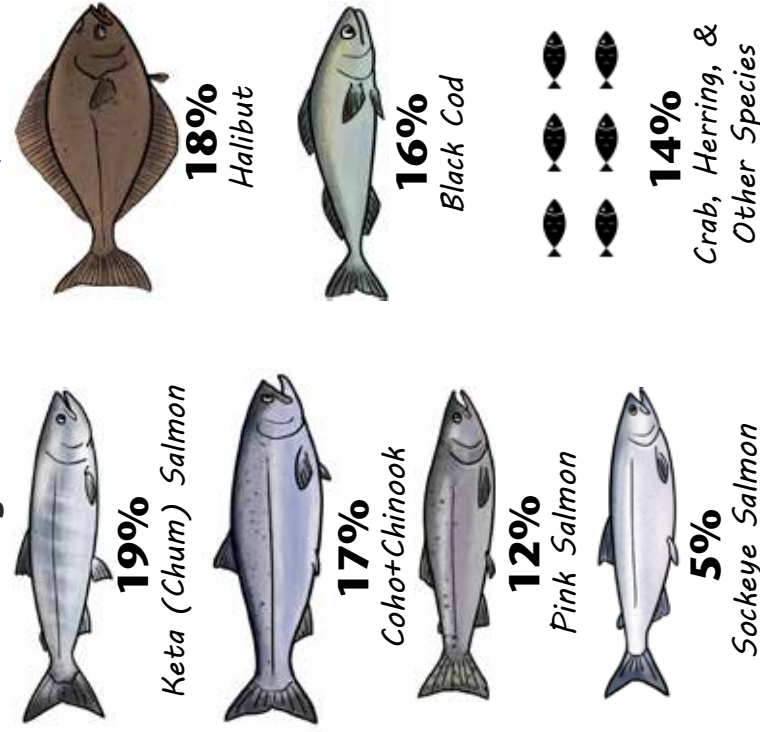
Resident Seafood Workers by Community

Sitka	1,329
Petersburg	960
Ketchikan Borough	905
Juneau	901
Prince of Wales Is.	697
Wrangell	448
Hoonah/Angoon/Skagway	268
Yakutat	232
Haines	196

Resident IFQ Quota & Limited Entry Permit Value by Community (\$Millions)

Petersburg	\$186
Sitka	145
Juneau	81
Ketchikan Borough	49
Wrangell	36
Prince of Wales Is.	36
Hoonah/Angoon/Skagway	28
Haines	18
Yakutat	5
Southeast Total	\$583





*Common property fisheries only.

Harvesting



2,683
Resident-owned
Fishing Vessels

\$218 Million
Harvest
Value

221
Million Pounds
of Seafood
Harvested

13% of Alaska Total



4,283
Resident
Fishermen

\$432 Million
Wholesale
Value

173
Million Pounds
of Seafood
Produced

10% of Alaska Total

Processing



50
Shore-based
Processing Facilities

\$432 Million
Wholesale
Value

173
Million Pounds
of Seafood
Produced

10% of Alaska Total



4,433
Shoreside
Processing
Workers
(2015)

Regional Salmon Fisheries

Gear Type*

Harvest Value
Permits Fished

Seine

\$46 Million
268

Troll

\$29 Million
1,036

Driftnet

\$21 Million
423

Total

\$96 Million
1,727

* 2015/2016 Avg.

Regional Economic Trends in Seafood Industry

	2010	2011	2012	2013	2014	2015	2016
Resident Commercial Fishermen	4,641	4,586	4,685	4,733	4,686	4,545	4,283
Gross Earnings (\$Millions)*	\$228	\$278	\$262	\$258	\$233	\$198	\$108
Average Processing Employment	1,443	1,610	1,595	1,747	1,840	1,747	1,3
Peak Processing Employment	3,972	4,324	3,974	4,551	4,775	4,615	3,2
Wages/Salaries (\$Millions)	\$49	\$57	\$54	\$66	\$68	\$72	\$
Regional Harvest Value (\$Millions)*	\$265	\$346	\$309	\$345	\$266	\$224	\$2
First Wholesale Value (\$Millions)*	\$473	\$628	\$516	\$641	\$511	\$466	\$4

*2016 data is preliminary.



NATIONAL IMPACT OF ALASKA SEAFOOD

National Impacts of Alaska Seafood Industry, 2015/2016 Avg.

	Number of Workers	FTE Jobs	Labor Income (\$Millions)	Output (\$Millions)
Commercial Fishing	29,200	13,700	\$824	\$1,738
Processing	28,700	14,400	\$563	\$2,446
Mgmt./Other	4,100	2,900	\$287	-
Distributors	800	800	\$64	\$131
Grocers	4,400	4,400	\$133	\$237
Restaurants	12,700	12,700	\$349	\$892
Direct Total	79,900	48,900	\$2,218	\$5,444
Secondary Total	-	50,100	\$2,949	\$7,315
Total Impacts	-	99,000	\$5,167	\$12,758

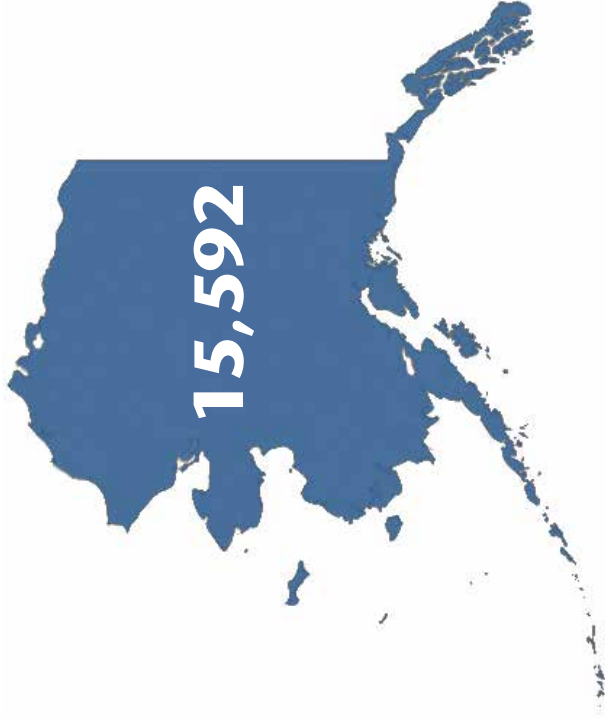


- Alaska’s seafood industry accounts for 99,000 FTE jobs in the U.S., including jobs throughout the entire production, distribution, and retail chain. Workers in these jobs earned an estimated \$5.2 billion in total annual labor income.
- The national economic impact of Alaska’s seafood industry includes an estimated 48,900 FTE jobs in fishing, processing, fisheries management, transportation and distribution, and in stores and restaurants. It also includes 50,100 secondary jobs throughout the economy created as a result of spending by businesses in the supply chain and their employees.
- Among all the participants in the national seafood supply chain, fishermen earn the largest share of labor income at \$824 million, or 37 percent of all direct labor income generated by Alaska’s seafood industry.
- U.S. economic output related to Alaska’s seafood industry totals \$12.8 billion including all direct and multiplier impacts. Total output is defined as the value of Alaska’s seafood resource, as it moves from the fishing vessel to the consumer’s plate, plus output arising from secondary impacts.



ALASKA'S COMMERCIAL FISHERMEN

Alaska Skippers and Crew,
by State of Residence, 2016



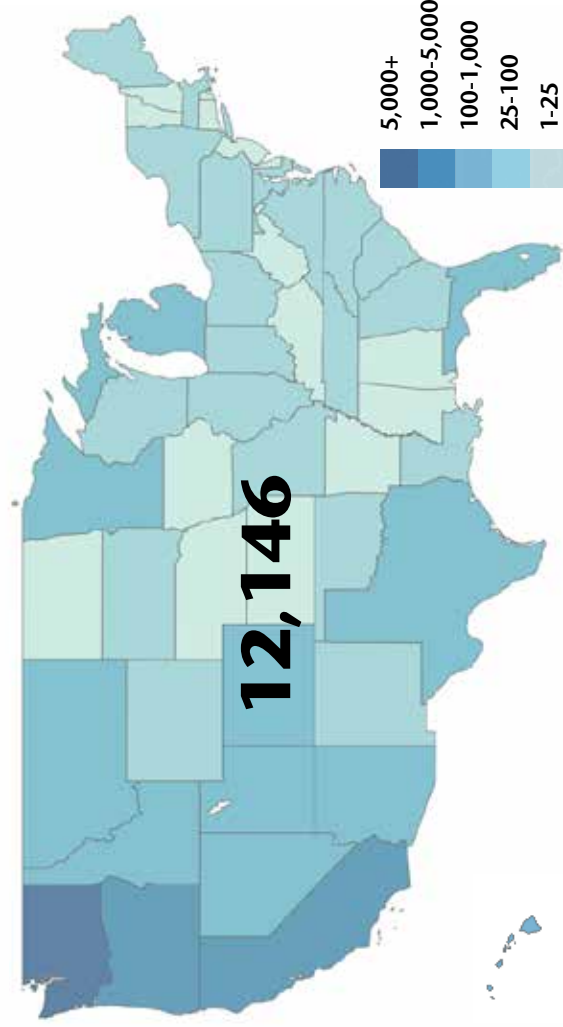
People from every U.S. state participate in Alaska's commercial fisheries. The maps on this page indicate the concentration of Alaska skippers, permit owners, and crew by state of residence.

In 2016, 62 percent of the industry's skippers, active permit owners, and crew were Alaska residents, totaling 15,592 fishermen.

Thousands more come to Alaska each year to work in processing plants or aboard processing vessels. Similar data for processing workers is not available.

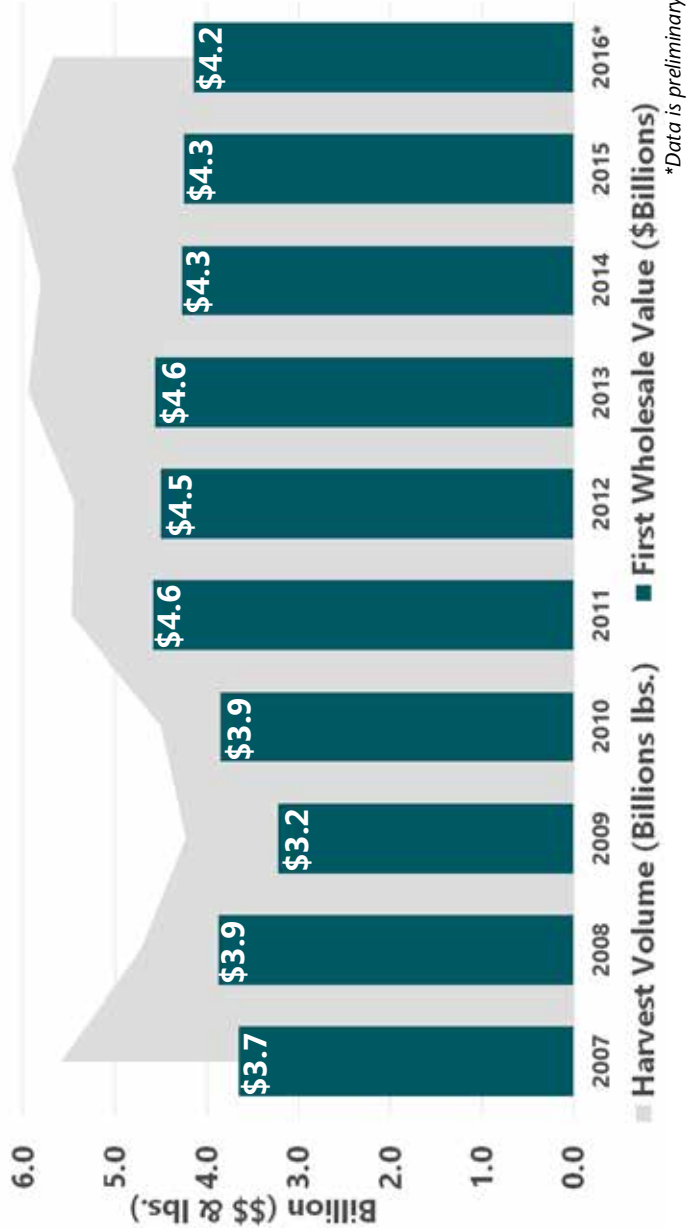
Nonresident fishermen and processors play a key role in Alaska's seafood industry. Without their contributions, it is unlikely the state could provide enough workers to capitalize on available fishery resources. Residents of every U.S. state participate in Alaska fisheries.

Regardless of where fishermen live, their earnings contribute to local economies in Alaska and around the country.



VALUE OF ALASKA SEAFOOD

The first wholesale value of Alaska seafood was \$4.19 billion in 2016. Of this total, fishermen earned \$1.67 billion in ex-vessel value while processors, both shoreside and at-sea, added \$2.52 billion in value. The industry typically harvests between five and six billion pounds of seafood each year.



The value of Alaska seafood has declined in recent years, primarily due to a stronger U.S. dollar and lower halibut, black cod, crab, and sole harvests. A strong dollar is bad for Alaska’s seafood industry because it makes domestic products relatively more expensive than competing foreign products. Since 2011, the U.S. dollar index has strengthened by 27 percent and ex-vessel value has declined by 22 percent.

U.S. Dollar Index & Ex-Vessel Value of Alaska Seafood

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
U.S. Dollar Index (Low = Good for AK)	80.4	77.1	80.7	81.5	76.3	80.4	81.5	83.1	96.8	91.5
Ex-Vessel Value (\$Billions, nominal)	\$1.65	\$1.89	\$1.44	\$1.69	\$2.13	\$2.11	\$2.01	\$1.92	\$1.77	\$1.67

Sources: OANDA.com and McDowell Group estim



"ASMI's mission is to enhance the value of Alaska seafood, a natural resource that supports thousands of Alaskans in communities all across the state."

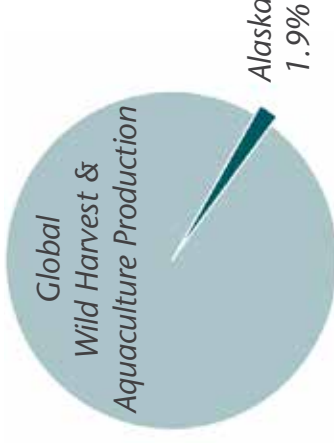
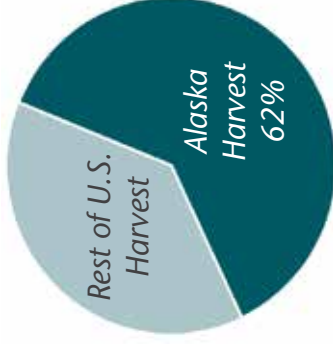
-Alexa Tonkovich,
Executive Director, ASMI



Competing in a Global Seafood Market

Alaska is a major seafood producer on a global scale. The state produces more wild seafood than all other U.S. states combined. If it were a country, Alaska would rank #7 among seafood exporting nations (in 2015). However, Alaska seafood is a small part of a global supply chain that encompasses large volumes of competing wild and farmed species. Supply and demand for competing species impacts prices for Alaska seafood products. The species below account for 80% of Alaska's ex-vessel value but each faces significant competition from other global producers.

Although Alaska seafood is essentially a commodity, Alaska is a high-cost environment. It is virtually impossible to compete on price alone. Luckily for Alaska, it is the largest seafood producing state in America with sustainable management practices and pristine marine waters - attributes no foreign or domestic competitor can match. Therefore, maximizing the resource value will require market differentiation, product development, and consumer awareness. Alaska and the seafood industry must continue to invest in these endeavors in order to maximize the economic benefits.



POLLOCK

AK Pct. of Global Supply: 44%
Pct. of AK Ex-Vessel Value: 27%
Pct. of AK Harvest: 54%

Pollock is the most abundant wild whitefish species on the planet. Alaskan pollock competes with Russian pollock, as well as tilapia and pangasius - farmed species whose combined production is nearly twice that of pollock.



SALMON

AK Pct. of Global Supply: 14%
Pct. of AK Ex-Vessel Value: 27%
Pct. of AK Harvest: 18%

Despite a record harvest, Alaska accounted for just 14% of global salmon supply in 2015. Farmed salmon production outnumbered wild harvests 2.5-to-1. Farmed production increased 43% (1.06 MMT) from 2010 to 2015.



COD

AK Pct. of Global Supply: 16%
Pct. of AK Ex-Vessel Value: 11%
Pct. of AK Harvest: 12%

Alaska's Pacific cod harvests pale in comparison to the more valuable Atlantic cod species. Global cod harvests increased 31 percent (417,500 MT) from 2010 to 2015.



CRAB

AK Pct. of Global Supply: 29%
Pct. of AK Ex-Vessel Value: 15%
Pct. of AK Harvest: 1.5%

Alaska is known for world class king and snow crab harvests, but Canada produces more snow crab while Russia produces more king crab. Pacific Northwest states also produce more Dungeness than Alaska.



SEAFOOD & ALASKA'S ECONOMIC FUTURE



Seafood is Alaska's most valuable renewable natural resource. With a continued commitment to careful resource management, Alaska will continue to produce large volumes of high-value seafood in perpetuity.

Though already a cornerstone of Alaska's economy, seafood holds great potential for additional economic benefit for the state. The resource is highly regarded by consumers around the world, with demand for tasty, sustainable seafood generally increasing faster than production from wild fisheries and aquatic farms. A stronger U.S. dollar has led to lower prices over the past few years, but with continued market development and promotion, the prospects are excellent in the long-term.

While the seafood industry and other industries cannot fill the hole in State General Fund revenues left by declining oil prices, seafood can play an increasingly important role in Alaska's economy by creating employment and income opportunities for Alaskans.

The seafood industry represents a unique opportunity for young Alaskans, in particular. The Alaska Maritime Workforce Development Plan, vocational training programs, revolving loan programs, and other economic development projects/programs will be critical in attracting Alaskans to the industry and developing the industry's next-generation workforce. In general, expanding employment and resource value in the seafood industry will require the following:

- Local or in-state training programs that help fisheries and processing companies replace an aging workforce.
- A stable tax/fee structure that considers fishery management, marketing, administrative, and other management costs, and preserves incentives for fishermen and processors to continue investing in the industry.
- Continued commitment to market development in order to maximize the value of Alaska seafood products.

Mariculture in Alaska

Mariculture, the practice of farming aquatic shellfish and plants, holds significant promise in Alaska. The Alaska Mariculture Task Force was established by Gov. Walker in 2016 to develop a comprehensive plan to expand the mariculture industry in Alaska. Growing oysters, kelp, and other species could play a key role in expanding the value of Alaska seafood.



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- Seafood Value since Alaska Statehood -



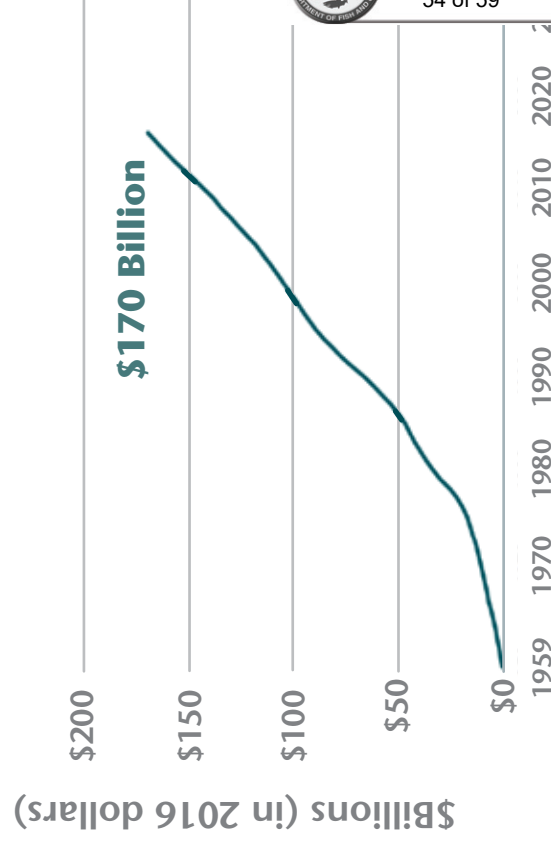
"Double-enders" sailboats were used to haul gillnets in Bristol Bay until the 1950s. Nets are now reeled in using hydraulics, but the fish are still picked by hand in gillnet fisheries.



Seafood has been a commercial enterprise in Alaska since the 1860's, making the industry more than twice as old as the state itself. The abundance of Alaska seafood is truly astounding. Through salmon traps, foreign offshore drift nets, and the crab frenzy, Alaska waters continue to produce billions of pounds of seafood each year.

Since statehood in 1959, Alaska's seafood industry has harvested an estimated cumulative total of 169 billion pounds of fish and shellfish, with a first wholesale value of \$170 billion, in 2016 dollars. Cumulative ex-vessel earnings since statehood total \$84 billion (adjusted for inflation) through 2016. Adjusted for inflation, the highest annual first wholesale value was produced in 1992 (\$5.5 billion). The largest harvest occurred in 2015, when fishermen hauled in 6.1 billion pounds.

Estimated Cumulative First Wholesale Value of Alaska Seafood (in \$Billions)



INDUSTRY TAX REVENUES

Commercial fishing and processing businesses incur substantial costs to operate in Alaska, including taxes, fees, and self-assessments of more than **\$146.2 million in 2016**. These revenue sources include:

Unencumbered taxes are used to fund local, state, and federal government. The Fisheries Business Tax is the largest of these taxes and is especially important as half of the receipts are distributed to local governments, many of which have few other sources of revenue. Taxes not included due to a lack of data include property taxes and federal income taxes, among many others.

Agency fees and cost recovery collections are designed to pay for specific services provided by state/federal government, and non-profit salmon hatchery operators. State fees on permits, leases, and vessels, as well as test fishery receipts, are generally used to pay for administrative costs associated with commercial fishery management. Federal cost recovery fees are collected for halibut, black cod, crab, and other fisheries. Salmon hatcheries, which benefit many user groups, are funded almost entirely through cost recovery harvests and enhancement taxes derived from the commercial fishing industry. Data were not available for a number of other agency fees, including those related to business licensing, port and harbor fees, federal vessel documentation fees, and federal fishery endorsements, among others.

Industry self-assessments are collected to fund industry-supported projects, such as seafood marketing efforts through the Alaska Seafood Marketing Institute and Regional Seafood Development Associations.

Overall, of the taxes and fees collected on the Alaska seafood industry and for which data are available, **40%** goes to state government (\$58.0 million), **31%** goes to local governments (\$45.8 million), **20%** to salmon hatcheries (\$29.8 million), and **9%** to the federal government (\$12.6 million).

2016, \$Millions	
Taxes	\$74.5
Fisheries Business Tax	\$39.9
Fisheries Resources Landing Tax	\$9.8
Marine Motor Fuel Tax	\$3.0
Corporate Income Tax	\$3.2
Local Raw Fish and Other Taxes	\$18.7
Agency Fees & Cost Recovery	\$53.2
CFEC Permit and Vessel Fees	\$8.2
Crew License Sales	\$3.4
Test Fishery Receipts	\$3.0
Processing/Mariculture/Other Fees	\$1.0
Salmon Hatchery Cost Recovery*	\$23.0
Federal Cost Recovery Fees**	\$10.8
Federal Observer Program	\$3.9
Industry Self-Assessments	\$18.4
Seafood Marketing (ASMI)	\$9.7
Salmon Enhancement	\$6.8
Seafood Development (RSDAs)	\$1.4
Dive Fishery Management	\$0.7
Common Property Assessment	<\$0.1
Total	\$146.2

Note: Data are for FY 2016. Totals may not sum due to rounding.

*Earnings are retained by salmon hatcheries, and account for the majority hatchery operating revenues. **Roughly \$2M goes to state government.

Sources: ADOR, CFEC, DCCED, ADF&G, NMFS, OMB, & McDowell Group estimates.



LOWERING THE COST OF LIVING IN ALASKA

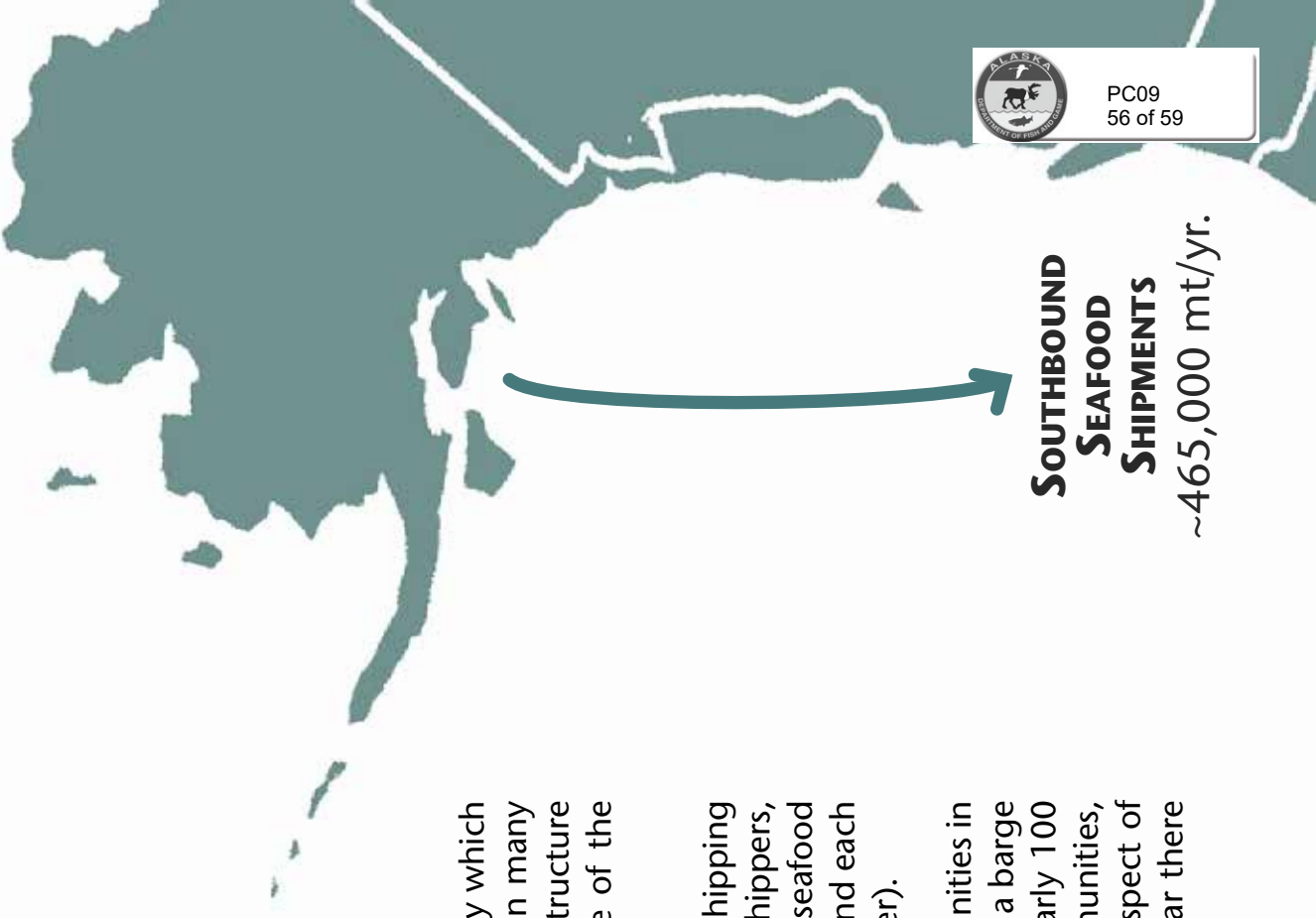


The seafood industry provides economies of scale and economic activity which lowers the cost of utilities, shipping, fuel, and local taxes for residents in many Alaska communities. Fishing communities also benefit from marine infrastructure and support services, which are more expansive due to the presence of the commercial seafood industry.

The majority of Alaska's consumer freight is a one-way, northbound haul. Shipping seafood on southbound routes provides "backhaul" revenue for shippers, allowing for more competitive rates on northbound freight. Alaska's seafood industry ships approximately 1 billion lbs. of finished product southbound each year, or the equivalent of roughly 23,000 containers (at 20 mt/container).

"Everyone benefits from the seafood industry, especially smaller communities in Western Alaska," says Kevin Anderson, president of Alaska Marine Lines, a barge transportation company that provides service between Seattle and nearly 100 ports and villages throughout Alaska. "Our ability to serve smaller communities, like those in Bristol Bay, would be drastically reduced without the prospect of southbound seafood shipments. Instead of six or seven sailings per year there might only be enough freight to support one or two."

Photo credit: Alaska Marine Lines.



**SOUTHBOUND
SEAFOOD
SHIPMENTS**
~465,000 mt/yr.

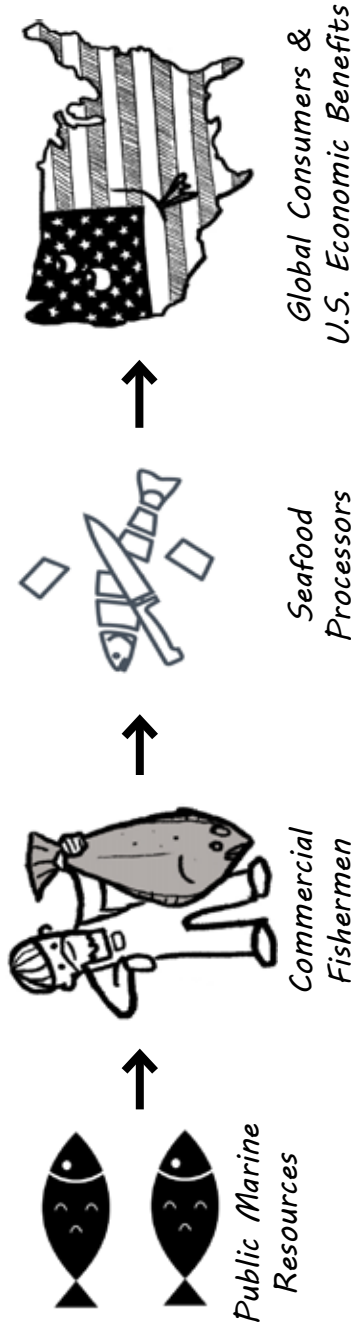


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FEEDING THE WORLD

Marine resources like fish and shellfish are public goods that belong to all Alaskans and other Americans. Alaska's seafood industry allows all consumers to efficiently access the resource, not just those who live nearby or have the means to access them with private boats. Commercial fishermen and processing companies are the conduit through which hundreds of millions of Americans can enjoy Alaska seafood.

The commercial seafood industry also converts this public marine resource into economic benefits for Americans, such as jobs, tax revenue, and exports (which help offset the U.S. trade deficit).



Alaska's marine resources are so prolific, they could feed the entire world at least one serving of delicious, healthy seafood each year, or to all American consumers every day for more than a month.



THERE'S PLENTY OF FISH IN THE SEA WHEN IT COMES TO ALASKA SEAFOOD

Number of Servings by Product Type in 2015



Fillets & Fish Meat
8.7 Billion



Surimi
2.4 Billion



Roe
1.6 Billion



Crab
296 Million



Other Products
12 Million

TOTAL:

12.9
BILLION
SERVINGS



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Fishermen & Processors Invest in Alaska

Fishermen and processors have made significant investments in the future of Alaska seafood. A survey of processors found that seven of the 10 largest shoreside processors invested a total of over **\$100 million** per year in capital expenditures over the past five years (2012-2016). The massive investment by this limited sample of Alaska processors underscores the commitment the processing sector has made to the industry's future - in addition to supporting its present through buying over \$1 billion of fish and shellfish per year.

Processors' investment and multiplier impacts are closely tied to resource value. Expanding value provides processing companies capital to modernize plants, expand production lines, and pay higher fish prices. All of these benefit local communities in Alaska and provide growth elsewhere in the U.S. economy.

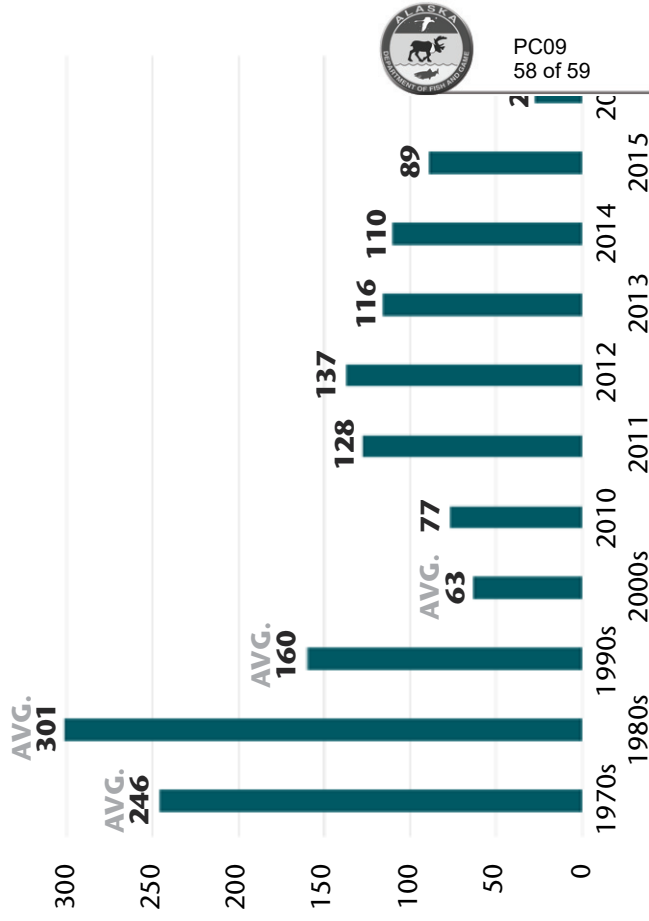
Alaska's commercial fishing fleet has expanded over the past five years. An average of 96 newly-built boats were added to the fleet during 2012-2016, representing an average investment of more than **\$60 million** per year. These new fishing assets will pay dividends to owners and their local economies for decades to come. Some Alaska fishing fleets are aging and must continue to retire/replace old vessels.

Modernizing the fleet is a critical part of sustaining the industry and creates many secondary jobs for American workers. However, investment in new vessels requires a healthy resource value. Today's ex-vessel value becomes tomorrow's capital investment. Unfortunately, investment in new vessels declined significantly in 2016 with lower seafood values. Raising the value of Alaska seafood is an excellent economic driver as it stimulates investment, brings new money into the economy through exports, and creates more jobs both, directly and indirectly, in Alaska and the Lower 48.



Kodiak, shown above, is home to several large fish processing plants. Construction of a new Trident Seafoods plant (large blue building, closest to the harbor) is an example of seafood processors' investment in Alaska.

New Commercial Fishing Boats Added to Alaska Fleet



Note: Only includes vessels active in 2016.

Source: CFEC 2016 Vessel File, compiled by McDowell Group.



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Fishermen from Juneau-based direct marketing firm Taku River Reds take a break on the bow of F/V Heather Anne. Pictured from left to right: Bottom row: Winston Warr, Athena Rose, Renee Warr, Heather Hardcastle, Kirk Hardcastle; Top row: Shelia and Len Peterson.



Prepared for:



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Prep

McDOW
GROUP



November 16, 2017

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

Members of the Board of Fisheries:

Please find below written comments from Cordova District Fishermen United regarding the upcoming Prince William Sound Finfish Board of Fisheries meeting proposals to be discussed in Valdez, Alaska on December 1-5, 2017. Please don't hesitate to contact CDFU with any questions whatsoever. Thank you for your consideration.

PROPOSAL 10 OPPOSE

The Copper River has seen strong and consistent returns of sockeye salmon using the current sustainable escapement goal (SEG). Therefore, there is no mandate or need to create a new optimal escapement goal (OEG). The lowest threshold of the proposed number would be higher than the current upper escapement goal. The Copper River is a mixed management watershed and is very different geographically from the Kenai. Fisheries and watersheds are not one size fits all. There is no data to support the development of an OEG for the Copper River that is not provided for the established SEG of sockeye. Additionally, there is no data to support the proposals statement that the current SEG set by ADF&G is artificially low and is used to exploit chinook harvests. ADF&G continues to monitor the watershed and makes management decisions based on the best available science. The Copper River has a directed king salmon fishery which is not incidental catch, but rather, a targeted and historical catch that has been part of the Copper River commercial fishery since its inception. Furthermore, revising an escapement goal is the role of ADF&G and the department's analysis of best available science.



PROPOSAL 13 SUPPORT

The use of boats in the Chitina dipnet fishery has continued to expand over the years and certain restrictions must be implemented in order to restrict the commercialization of this personal use fishery. Dipnetting from a river boat has become increasingly popular and improperly licensed commercialized charter services have capitalized on dipnetters fishing from boats in order to access fish in a timelier manner. Restricting dipnetters to fish from the beach would result in less strain on the resource and would equalize the access of all dipnetters. CDFU is supportive of the observations of local subsistence users and the observations of the Ahtna C&T Use Committee.

PROPOSAL 14 OPPOSE

CDFU supports sustainable and strong king escapement, but it is inefficient and unreasonable to mandate management measures based on a preseason forecast. ADF&G has the ability to manage the timing of season openings for all fisheries if required under the existing management plan language.

Forecasts are a prediction of potential species returns. ADF&G has been transparent about the fact that in season harvest data is the best and most reliable mechanism for management decisions. It is effective and timely in this case specifically to utilize in season data when it comes to management decisions.

PROPOSAL 15 SUPPORT

Gillnet web tangles fish more than other types of web which makes release without harm more difficult. Persons engaged in personal use fisheries are often seeking a specific harvest or catch by species. The use of monofilament increases the chance of entanglement and struggle, and therefore increases the mortality rates of unintended catch. In this case, CDFU defers to and supports the observations of subsistence users in the region.



PROPOSAL 17

OPPOSE

If implemented, this proposal would more than double the size of the current Chitina subdistrict personal use fishery. Extending this harvest boundary would have great negative implications on the Native Village of Eyak mark-recapture study which helps to determine overall inriver abundance and contributes to estimates of run size and spawning escapement. This study has been conducted annually since 2003 and is integral to ADF&G and stakeholder knowledge of the Copper River fishery. This study increases the department's ability to make data driven management decisions to protect the health and sustainability of the run. Extending this harvest area would increase mortality which would impact the ability of scientists overseeing the mark-recapture study to accurately estimate chinook returns. This information is invaluable to all user groups for in season management as well as the long term health of Copper River chinook. If implemented, this expansion would also increase the burden on law enforcement in the Chitina subdistrict by increasing the area of enforcement by roughly 18 miles of river bank area that is difficult to navigate due to many overlapping shallow channels.

PROPOSAL 18

OPPOSE

If the commercial fishery is closed for more than thirteen days, there is clearly an abundance concern to which management must respond. In such an event, increasing harvest potential to any one gear group over another would be irresponsible and short sighted. Depending on the time of year and the strength of the season, one or all gear groups may be impacted, which is simply the natural result of managing a natural resource that fluctuates in its abundance from year to year. CDFU supports all user groups sharing in the burden of conservation.



PROPOSAL 19 OPPOSE

CDFU supports increased subsistence opportunity when sockeye and chinook run strength warrants it. CDFU maintains that in season management tools are an effective and sustainable method that outweigh the value of any mandatory regulatory decision. ADF&G management has the EO authority to expand subsistence openings and area in season and demonstrated that authority during the 2017 season. The department demonstrated this type of management during the 2017 season by leaving area open to subsistence users that was closed to the commercial fleet. CDFU supports the discretion of the department in regards to subsistence openings and subsistence access.

PROPOSAL 21 OPPOSE

CDFU opposes Proposal 21 due to the ambiguity of its language and intent. However, CDFU agrees that some restrictions and monitoring of subsistence herring is important and merits discussion.

PROPOSAL 22 OPPOSE

The health and abundance of herring stocks in Prince William Sound have been in question for decades and lower than the necessary threshold for regular harvest. There is no surplus of herring to justify opening a personal use fishery in Prince William Sound. State residents currently have access to the herring subsistence fishery.

PROPOSAL 23 SUPPORT

CDFU supports prohibiting catch and release in spawning habitat and the intent language of proposal twenty-three. If we truly wish to protect the longevity and health of salmon runs in this region, the salmon should not be harmed while spawning.



PROPOSAL 27 OPPOSE

CDFU opposes sport fishing in spawning waters. As Alaskans and as fishermen, we have a duty to respect and protect the health and abundance of the resource for generations to come. Increasing harvest or access in historical spawning waters is destructive to the future of the salmon and returns.

PROPOSAL 29 OPPOSE

ADF&G has EO authority that is needed to effectively manage in season depending on abundance and other factors. There is no evidence that this extreme measure is necessary for the sustainable management of the Copper River District.

This proposal states that chinook salmon are a stock of concern. This is inaccurate. On October 2nd, 2017, ADF&G released memorandum RC5 which states that “currently, there are no stocks of concern in the Prince William Sound management area.” (See Memorandum RC 5, PWS Management Area Stock of Concern Recommendation) Limiting the harvest area of the Copper River drift fleet to this extent is unreasonable and lacks scientific data to support it.

This proposal also states that the 2016 and 2017 commercial harvest of chinook salmon resulted in the elimination of “all opportunity for upriver users.” This is also inaccurate. It was ADF&G’s pre-season forecast, not the commercial fleets harvest, that prematurely limited opportunity for upriver users which was immediately rescinded upon the finding of contradictions between the preseason forecast and in season abundance numbers.

Additionally, the proposal states that chinook salmon are incidental catch. This is false. Chinook salmon are directed and historical catch. Chinook salmon make up a part of the Copper River driftnet fishery which takes place in an area that has harvested chinook, red, and silver salmon since its inception.



PROPOSAL 31 OPPOSE

The Copper River commercial fishery is a multi-stock fishery and is not limited to sockeye salmon. Reducing the depth of gillnets in the Copper River District would result in prohibitive and unreasonable cost burdens for the commercial fleet and lost financial opportunity for the State of Alaska. The Copper River has a directed king salmon fishery which is not incidental catch, but rather, a targeted and historical catch that has been part of the Copper River commercial fishery since its inception. In years past as well as the Summer of 2017, CDFU has publicly opposed premature restrictions on subsistence users that are based on a forecast or related assumptions.

The 3,500 chinook harvest goal is not a commercial catch goal. It is simply a forecasted projection of a potential goal. ADF&G raises or lowers goals based on all available data and in season harvest indications. Additionally, reducing gear depth would limit sockeye harvest which could result in over escapement.

This proposal states that chinook salmon are a stock of concern. This is inaccurate. There are no species of salmon that are listed as a stock of concern in the Prince William Sound or Copper River District. Limiting the harvest area of the Copper River drift fleet to this extent is unreasonable and lacks scientific or data to support it.

PROPOSAL 32 OPPOSE

Mandated regulations should not be implemented based on a forecast. According to ADF&G, the forecast range has an 80% confidence level for the total run forecast. The earliest chinook count data regarding inriver abundance estimates used by ADF&G is from 1999; therefore, there is not enough data to create a 20-year average. ADF&G also states that Chinook total salmon run forecasts between 1998-2007 were not generated as the inriver abundance and spawning escapement estimates were inadequate. In the January 20th forecast summary for Chinook ADF&G states that if the 2017 forecast was realized it would tie with the 2016 total run forecast as the smallest run since 1980. This forecast was not realized for the year of 2017. There is a pattern of these forecasts being misleading and resulting in frustration, for all user groups, when mandated regulations are placed prior to in season monitoring, based off information that is just an estimate of total run sizes for the year.



This proposal states that chinook salmon are a stock of concern. This is inaccurate. There are no species of salmon that are listed as a stock of concern in the Prince William Sound or Copper River District. Limiting the harvest area of the Copper River drift fleet to this extent is unreasonable and lacks scientific or data to support it.

CDFU defers to the department and its scientists to manage based on a combination of past data and in season abundance. CDFU supports the department's conclusion that in season abundance is the least biased and most accurate mechanism.

PROPOSAL 33 OPPOSE

The Copper River commercial fishery is a multi-stock fishery and is not limited to sockeye salmon. The Copper River has a directed king salmon fishery which is not incidental catch, but rather, a targeted and historical catch that has been part of the Copper River commercial fishery since its inception. In years past as well as the Summer of 2017, CDFU has publicly opposed premature restrictions on subsistence users that are based on a forecast or related assumptions. The commercial fleet experiences significant restrictions on area and reduced fishing time in order to conserve chinook salmon when abundance is low.

PROPOSAL 34 OPPOSE

CDFU defers to the fisheries biologists who understand the timing of salmon runs up river, but it is imperative to recognize that many factors contribute to the rate and pace at which fish pass the sonars up river. ADF&G and other stakeholders are working to provide additional tools to monitor in river data and the movement of salmon up river in the near future. Consequently, we should avoid locking ADF&G's management options up in this proposed regulation.

For example, the 2013 salmon season presents a strong contradiction to this proposal. The first commercial opener was a strong harvest but no fish had passed the sonar. As a result, fishing was closed. Then a massive number of fish passed the sonar and the season was consequently over escaped. The rate at which salmon move up river varies from season to season and depends upon low or high water levels, weather, temperature, and the pace at which the river ice melts.



CDFU maintains that in season management tools are an effective and sustainable management tool that outweigh the value of any mandatory regulatory decision. ADF&G management has the EO authority to expand subsistence openings in season. CDFU supports the discretion of the department in regards to subsistence openings and subsistence access.

PROPOSAL 37 SUPPORT

Kayak Island is traditional and historical area for the Copper River gillnet fleet. CDFU would like to see the Board of Fisheries and Department of Fish and Game explore the intent of this proposal based on best available science.

PROPOSAL 40 OPPOSE

CDFU opposes this due to the fact that it would be impossible to enforce and would burden fishermen to validate the 4 fathoms rule. For example, a set that is made legally could then become illegal due to tide fluctuation. Regulation is already in place that makes it illegal for a gillnet to be anchored.

PROPOSAL 41 SUPPORT

CDFU supports increasing access to the drift gillnet fleet where there are viable waters to fish or where it is feasible to legally set a gillnet.



Cordova District
PO Box 939 | 509 First Street |
phone. (907) 424 3447 |



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web. www.cdfu.org

Sincerely,

Jerry McCune
President of the Board, CDFU
Gillnet Fisherman, F/V Wudahad
jmccune59@hotmail.com
Mobile: 907.200.0240

Rachel Kallander
Executive Director, CDFU
Rachel@CDFU.org
Mobile: 206.334.4618

CC: John Renner, Vice President & Herring Division Representative
Seine, Herring & Gillnet Fisherman
F/V Shadow Dawn & F/V Never Enough

Curt Herschleb, Director
Gillnet & Groundfish Fisherman
F/V Chilkat

Gus Linville, Groundfish Division Representative
Seine, Tender & Groundfish Fisherman
F/V Frisian Lady

Robert Eckley, Groundfish Division Representative
Seine, Gillnet, Herring & Groundfish Fisherman
F/V Ariel, F/V Coghill, F/V Alaganik & F/V Cape Fear

Trae Lohse, Gillnet Division Representative
Gillnet & Groundfish Fisherman
F/V Catalyst

Red Culbertson, Seine Division Representative
Shrimp & Seine Fisherman
F/V Ninkasi

Vic Jones, Herring Division Representative
Seine, Gillnet & Herring Fisherman
F/V Valkyrie & F/V Chelsea Dawn



Cordova District
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web. www.cdfu.org

Mike Mickelson, Director
Gillnet & Seine Fisherman
F/V Amy & F/V Mariah

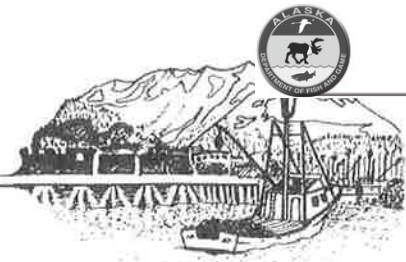
Ezekiel Brown, Director
Gillnet & Seine Fisherman
F/V Viking Maid & F/V Meshed Up

Galen Meyer, Seine Division Representative
Seine Fisherman
F/V Tina

James Honkola, Gillnet Division Representative
Gillnet Fisherman
F/V Sportsman

Kal Kuzmin, Director
Gillnet Fisherman
F/V Sea Glider

CITY OF CORDOVA



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November 17, 2017

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

Members of the Board of Fisheries:

The City of Cordova is a commercial fishing community with state-wide and national participation. There are also residential subsistence, recreational, and sport fishing groups in Cordova. Approximately \$1,000,000,000 of commercial fisheries infrastructure has been built and maintained in Cordova to deliver some of the highest quality seafood in the world to the global market. Approximately 90% of Cordova's economy can be directly attributed to the harvest, processing, and delivery of this seafood, and represents a renewable, sustainable economy of which the Copper River fishery is a key element. If commercial fisheries are balanced with the needs of the subsistence, recreational, and commercial sport fishing user groups, the Copper River can sustain multiple Alaskan communities at a time when strong communities are vital to the sustainability of a strong state.

Cordova supports consistency in management, reporting, and harvest by the various user groups of the Copper River Fisheries. This consistency would suggest that all user groups are limited in the growth of their share of the harvest by managing either the number of permits issued or the percentage of harvest allocated to each group. To measure annual abundance of the resource, consistency in the timeliness of reporting amongst user groups is paramount. If twenty-four hour harvest data is required for one user group, it should be required for all user groups, and modern technology makes this feasible.

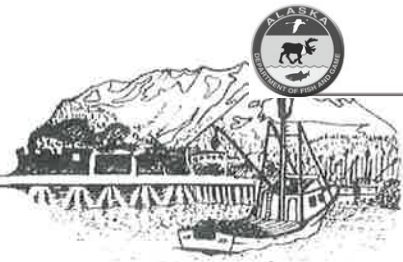
When evaluated against the objective of maintaining a balance between the user groups with an emphasis upon economic sustainability, the City of Cordova submits as follows:

Opposition to proposal 10, which represents a reallocation of more of the resource to upper river user groups by proposing larger relative escapements.

Support for proposal 13 which would prevent the growth and conversion of a personal use fishery to a quasi-commercial fishery.

Opposition to proposal 14 which would allocate resources based on forecasted resource abundance rather than the superior accuracy of empirical data generated by actual harvest of the early season commercial fisheries at the mouth of the Copper River.

CITY OF CORDOVA



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Support for proposal 15 which supports conservation of fisheries resources by limiting unnecessary mortality.

Opposition to proposal 17 which potentially expands the harvest percentage of the personal use fishery, interferes with accurate measurement of the resource by the Native Village of Eyak, and expands enforcement requirements exacerbating the shrinkage of enforcement resources.

Opposition to proposal 19 deferring to the subsistent management tools of the Department, but encouraging immediate reporting of subsistence catch to improve the timeliness and accuracy of data to the Department.

Opposition to Proposal 21 and 22; supporting the prioritization of subsistence harvest of herring within the reasonable harvest constraints of subsistence use and prioritizing the restoration of historical commercial harvest of herring before developing new personal use fisheries in Prince William Sound.

Support for Proposals 23 and 27 to protect the vigor and success of spawning salmon in their spawning habitat.

Opposition to Proposals 29, 31, 32, 33, 34 which appear to be short-sighted responses to an enormous gap between forecast and actual abundance in 2017 supported by inaccurate perceptions, and to preference for forecasted rather than in-season data, and to preference for management by policy rather than science-based management by the Department.

Respectfully Submitted,

Mayor Clay Koplin, City of Cordova



Prince William Sound/Upper Copper River/Upper Susitna River Fisheries Proposals

Without regard to any particular proposal, we note some general principles. First and foremost, appropriate subsistence use of the fishery must be protected, even as against other uses. While commercial and sport fishing are important to the livelihood and enjoyment of Alaskans and visitors, actual subsistence use is the difference between a healthy, well-nourished population and an under-nourished one. Second, while the various fisheries must be managed for abundance, in the face of scarcity neither the commercial nor the sport fishery should be made to bear the brunt of limitations. Instead, all non-subsistence users should share in the conservation effort. Third, while modern learning is critically important to effective management of fisheries, attention must also be given to traditional ways of knowing. In particular, the Ahtna have been managing fish and game in the Copper River Basin for over 10,000 years, and understand things about the populations, means, and methods that can be helpful. This traditional knowledge is a valuable management resource, and should be integrated with other tools to obtain the best results. Finally, hard numeric limits interfere with the ability of professional managers to manage based on the rapidly-changing conditions in the Basin. Things like mandatory openings on a certain date, while convenient in avoiding paperwork and administrative burden, undermine the flexibility of the system. Until there are enough salmon for all users to get what they need and want without undermining future returns, the resource will have to be carefully managed notwithstanding the overhead involved in doing it.

Copper River Escapement Goal (1 Proposal)

PROPOSAL 10

5 AAC 24.360. Copper River District Salmon Management Plan. By Fairbanks Fish and Game Advisory Committee.

Comments:

We oppose Proposal 10. A sustainable escapement goal (SEG) should be set at a level that allows maximum harvest while sustaining the resource. The Copper River habitat and what it will support has nothing to do with the Kenai habitat. In addition, king harvest is a separate issue from the sockeye SEG.



Upper Copper River Subsistence and Personal Use Salmon (8 Proposals)

PROPOSAL 11

5 AAC 01.647. Copper River Subsistence Salmon Fisheries Management Plans. By Alaska Department of Fish and Game.

Comments:

We oppose Proposal 11. We support the use of emergency orders to open the Batzulnetas subsistence fishery after consideration has been given to the ability to meet escapement goals, including after accounting for the Federal subsistence fishery.

PROPOSAL 12

5 AAC 01.620. Lawful gear and gear specifications. Bt James Marchini.

Comments:

We oppose Proposal 12 to require all fishwheels to have a live box when fishing in the Glennallen Subdistrict subsistence fishery. It would cost more to subsistence users who use a fish wheel to get king salmon to build a live box. Additionally, it would be dangerous to the fisher as well as the fish to wrestle it back into the Copper River. Also, it is against our way of life and custom to throw an invaluable king salmon back into the Copper River. Discarding king salmon from a fish wheel box will seriously injure or kill king salmon. Wanton waste will occur if King Salmon were thrown into Copper River.

PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications. By Ahtna Tene Nene' Customary and Traditional Use Committee.

Comments:

We support Proposal 13. There is an ever-increasing shift in fishing participation in the Glennallen Subdistrict by dipnet from boats. This is not a customary and traditional way of fishing and should not be allowed. Since 1968, Chitina Subdistrict has harvested more salmon than the Glennallen Subdistrict (ADF&G Division of Subsistence Alaska Salmon Fishing Database (ASFDB) accessed February 2010; Somerville 2010 for 2009 preliminary data.)

PROPOSAL 14

5 AAC 24.361. Copper River King Salmon Management Plan. By Wrangell-St. Elias National Park Service Subsistence Resource Commission.

Comments:

We oppose Proposal 14. We oppose any restriction on subsistence fisheries as long as commercial and sport fisheries continue: fish and game resources should be managed for



abundance, but in the face of scarcity subsistence use should be protected first and foremost. Subsistence fisheries shouldn't be restricted when other fisheries are open. Sufficient salmon escapement must provide for subsistence fisheries.

PROPOSAL 15

5 AAC 01.620. Lawful gear and gear specifications and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. By Wrangell-St. Elias National Park Subsistence Resource Commission.

Comments:

We support Proposal 15 as monofilament netting damages king salmon. If king salmon that have been caught with monofilaments are released in this fishery, it will waste the resource. We support requirement to use knotless web in dipnets as well. Traditionally, Ahtna People used roots for dip nets.

PROPOSAL 16

5 AAC 01.xxx. New Section and 5 AAC 77.xxx. New Section. By Cordova District Fishermen United Board of Directors.

Comments:

We support Proposal 16. This is a good way to monitor in season harvest and effort and will assist with better in-season management decisions.

PROPOSAL 17

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. By Chitina Dipnetters Association.

Comments:

We oppose Proposal 17. This will expand the fishery on to Ahtna Lands as well as increase harvest and effort. Ahtna, Inc., the owner of the land surrounding the proposed fishery, must be consulted and SHPO work needs to be done to determine impacts to historical and cultural sites. This is an allocative proposal and should be treated as such.

PROPOSAL 18

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. By The Chitina Dipnetters Association and Fairbanks Fish and Game Advisory.

Comments:

We oppose Proposal 18. If there is a conservation concern, all non-subsistence user groups need to share in the burden of conservation. This is an allocative proposal and should be treated as such in the process.



Prince Willaim Sound/Upper Copper River Subsistence and Personal Use Salmon and Herring (2 Proposals)

PROPOSAL 20

5 AAC 01.610. Fishing seasons. By Robert A. Smith.

Comments:

We oppose Proposal 20 as it is too vague and subject to abuse.

Upper Copper River/Upper Susitna Rivers Sport (3 Proposals)

PROPOSAL 23

5 AAC 52.022. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area. By Ahtna Tene Nene'.

Comments:

We support this Proposal 23. Catch and release has a known mortality rate and this wastes the resource. Catch and release is inherently cruel and painful torture. We do not support catch and release, it is not our way of life to throw fish back into the water.

PROPOSAL 24

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area. By Alaska Department of Fish and Game.

Comments:

We support Proposal 24 to simplify regulations and close the sports salmon fishery in the Gulkana River drainage.

Copper River Commercial Salmon (10 Proposals)

PROPOSAL 25

5 AAC 52.022. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area. By Alaska Department of Fish and Game.

Comments:

We support Proposal 25 with an amendment to note that the hook can be barbless. Less damage is done to the fish's mouth, esophagus, and gills when barbless hooks are used. This proposal makes regulations easier to understand, is less restrictive, and gives more opportunity to fish for non-salmon resident fish species.



PROPOSAL 28

5 AAC 24.361. Copper River King Salmon Management Plan. By Cordova District Fishermen United, Gillnet Division.

Comments:

We oppose Proposal 28. Regulatory action must ensure sufficient escapement of Sockeye and King Salmon to spawning grounds.

PROPOSAL 29

5 AAC 24.350. Closed waters. By Fairbanks Fish and Game Advisory Committee.

Comments:

We oppose Proposal 29. It is too restrictive and dangerous. This is an allocative proposal and should be treated as such in the process.

PROPOSAL 30

5 AAC 24.350. Closed waters. By Warren Chappell.

Comments:

No comments.

PROPOSAL 31

5 AAC 24.331. Gillnet specifications and operations. By Fairbanks Fish and Game Advisory Committee.

Comments:

We oppose Proposal 31. It is unnecessarily restrictive and costly to the industry by forcing investment in more types of nets and the labor involved in re-rigging during the season. The purpose of reducing Chinook catch in times of reduced abundance can be done more effectively through area and time restrictions.

PROPOSAL 32

5 AAC 24.361. Copper River King Salmon Management Plan. By Fairbanks Fish and Game Advisory Committee.

Comments:

We oppose Proposal 32 as it presents an unworkable solution. As we have seen, the preseason forecast is subject to errors and manipulation in a number of ways. Please see our comments on Proposal 14 to understand our concerns. All non-subsistence user groups should bear the burden of conservation in a time of shortage. In a way, this is an allocative proposal and should be treated as such.



PROPOSAL 33

5 AAC 24.361. Copper River King Salmon Management Plan. By Fairbanks Fish and Game Advisory Committee.

Comments:

We oppose Proposal 33. There are more effective ways of reducing Chinook harvest in times of shortage through time and area restrictions. If the Department will institute solid in-season in-river harvest and actual spawning bed arrival tracking systems, we hopefully will stay away from the crisis that has happened on the Yukon.

PROPOSAL 34

5 AAC 24.310. Fishing seasons. By Fairbanks Fish and Game Advisory Committee.

Comments:

We oppose Proposal 34. It gets submitted every cycle and has no merit other than allocation. An allocation proposal should be submitted if that is the intention. ADF&G manages sonar weir to ensure escapement in-river goal is being met.

PROPOSAL 35

5 AAC 24.310. Fishing seasons. By Robert A. Smith.

Comments:

We oppose Proposal 35. Opening should be based on run timing and abundance. The 1st of May is way too early to allow commercial fishing for king salmon. King salmon need to escape to spawn and propagate further healthy returns.

PROPOSAL 36

5 AAC 24.320. Weekly fishing periods. By Robert A. Smith.

Comments:

We oppose Proposal 36. The area management biologists invoke their discretion to manage the fishery based on run timing and abundance. Provided their decisions are based in sound science and traditional knowledge, they should not manage against a backdrop of mandatory openers.

NOTICE: Ahtna Tene Nene' C&T changed their committee name to CT Committee.

Submitted by:

C&T Committee
November 16, 2017



Submitted By
Dale Anderson
Submitted On
11/15/2017 3:14:34 PM
Affiliation

Phone
9078223128
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alaskalivin@hotmail.com
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HC 60 Box 299K
Copper Center, Alaska 99573

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
Damien Delzer
Submitted On
11/17/2017 9:35:49 AM
Affiliation

Phone
9073281814
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akdelzer@gmail.com
Address
1565 Holy Cross Drive
Fairbanks, Alaska 99709

I support Proposal 10.

This allows better management of both species of salmon.

Thank you,

Damien Delzer

Submitted By
Damien Delzer
Submitted On
11/17/2017 9:38:18 AM
Affiliation

Phone
9073281814
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akdelzer@gmail.com
Address
1565 Holy Cross Drive
Fairbanks, Alaska 99709

I oppose Proposal 13.

Dipnetting from boat or from shore allow the harvesting fisherperson the opportunity to feed their family and allows for better distribution of fishing opportunity.

Submitted By
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Submitted On
11/17/2017 9:40:24 AM
Affiliation

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I oppose Proposal 15.

It would be harmful to families to ban monofilament nets.



Submitted By
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Submitted On
11/17/2017 9:41:28 AM
Affiliation

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I oppose Proposal 16.

User permits provide detailed Harvest information already.

Submitted By
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Submitted On
11/17/2017 9:44:29 AM
Affiliation

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Fairbanks, Alaska 99709

I oppose Proposal 28 and Proposal 36.

ADFG should always be able to manage commercial fisheries and have the authority to mandate inside water closures if the need arises.

Additionally, the Chinook are very susceptible to overharvest, thus they inside mandatory closures are critical to protect this vulnerable species from overharvest.

Submitted By
Damien Delzer
Submitted On
11/17/2017 10:04:33 AM
Affiliation

Phone
9073281814
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akdelzer@gmail.com
Address
1565 Holy Cross Drive
Fairbanks, Alaska 99709

I strongly support Proposal 17 and Proposal 18.

With a set bag limit, expanding the range of personal use fishing will not increase harvest. It will only allow for less crowding and less potential accidents with multiple boats crowding into turbulent and hazardous areas.

Thank you.



Submitted By
Dan P Bilderback
Submitted On
11/14/2017 11:36:07 AM
Affiliation

Phone
9076320079
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danbilderback@gmail.com
Address
4623 Campus Circle
Anchorage, Alaska 99507

RE:PROPOSALS 28-37, Recommend no action

Hi, my name is Dan Bilderback. I was raised in the town of Cordova and now live in Anchorage. I have commercially drift gillnetted on the Copper River Delta from the age of 16. I and many others have managed to raise a family from this occupation. Through the years I come to respect and admire the Commercial Fish division of ADF&G's ability to manage the fishery. I would like to comment on the following proposals:

RE:PROPOSALS 28-37, These all deal with The Copper River Delta commercial fishing **AREA** and **TIME**. I am a big supporter of the ADF&G's ability to reach into their tool box of mostly **AREA, TIME** and **Realtime Research Sampling** to manage the Commercial fishery. As they can tell you, forecasts are mostly a guide on how to approach the run management for the first few fishing periods, conservative, moderate or somewhat aggressive. With this approach ADF&G can get a handle on **run size** and manage accordingly to maximize the goals of the Copper River Management Plan. The most current example of this is The **2017 king season**, the forecast was for a very weak run with a moderate red run at the same time. ADF&G put area and time restrictions that were the **most conservative** I've ever seen in my 45 years as a CR drift gillnetter. It turns out that the king fishery was not near as bad as forecasted. The red run was a little better also. So we got a little more **TIME** to harvest the **ABUNDANCE** of fish over the forecasts. Fish bound for In-river fisheries and spawning beds also exceeded the Plan's goals.

In Summary, I would like to recommend **NO ACTION** on **Proposals 28-37**.

Thank you current Board Members for your time and consideration.

DAN BILDERBACK

F/V SUMMERTIME SAGE



Submitted By
David Blake
Submitted On
10/30/2017 2:14:17 PM
Affiliation
Commercial Fisher

2017 Prince William Sound Finfish Board of Fisheries Meeting

Proposal 10: I oppose this proposal. ADF&G has already set and has managed this resource successfully for many years. The King Salmon is not exploited as per the submitters comments. There is not an issue with escapement just another grab for a larger % of the allocated run by another user group.

Proposal 13: I support the passage of this proposal by the Ahtna Tene Nene. The writers of this proposal have a long history on the upper Copper River and its tributaries. The dip net fishery is by comparison new and non traditional. This dip net fishery has been growing and the technology of dip netting has changed from onshore dip nets to basically commercially harvesting the salmon with boat powered capture devices. This is not really a dip net if it is attached and powered through the current by a boat. As

Proposal 14: I oppose this proposal. The department of fish and game has the ability with tools already in place to manage this fishery. The examples of the 2017 forecast is outdated as the King run on the Copper River for 2017 was much larger (by multiple time) than forecast. Much of the proposal came about by the Sport Manager closing the season in March when the forecast came out instead of following logical abundance based management instead of Forecast based management. More regulation is not warranted as the department has the tools in place to manage the run in season by abundance based management. Let the managers do their job in season as regulations in place are intended.

Proposal 15: I strongly agree and support this proposal. The use of any kind of gillnet material in the dipnet fishery should not be allowed. I agree with the submitters of this proposal as to the reasoning of why this type of gear should not be used in the dip net fishery.

Proposal 16: I agree with this proposal. ADF&G needs all tools available to see what all users of the resource are catching. Charter operators in the upper Copper river fishery are really another commercial user. ALL commercial caught salmon in the Copper River watershed should be recorded as is required by all commercial fishers. Log Books and timely reporting requirements would enhance the ability of ADF&G in making timely and accurate management decisions when using abundance based management for this resource.

Proposal 17: Strongly disagree with this proposal. Enlarging the area would only lead to more use of the resource. This proposal would more than double the available area for exploitation of this resource. It would lead to more charter operations (another commercial user that at this time has not reporting requirements) exploiting the resource. The Ahtna Tene Nene Native committee proposal is to limit the dipnetting from boats. This proposal would expand the dip netting from boats. I believe that this is another grab for a larger part of the fully allocated resource.

Proposal 18: I oppose this proposal. All conservation seems to be balanced upon the commercial fishers. This proposal would lead to more fish being taken by the dipnet fishers when lack of abundance is in question. If the commercial fishery is closed then it is for the reason of lack of abundance. With lack of abundance all users should be aware and share in the conservation of the resource.

Proposal 19 & 20: I oppose this proposals only because I can see some possible enforcement issues with the subsistence fishery always open. I suggest that the Board consult with enforcement as to if the passage of this proposal would be of concern with the enforcement division.

Proposal 23: I support this proposal. I support any and all restrictions of catch and release fisheries. There is too much trauma to the spawning population of any catch and release fishery. Salmon especially have spent all their energy to reach spawning grounds and then are subject to continued trauma in catch and release sport fishery. There must be some place that the spawners have reached undisturbed safe waters to spawn and renew the resource.

Proposal 24: I support this proposal: ADF&G submitted this proposal and in doing so must see or have seen the need for restrictions in these areas for the good of the resource.

Proposal 28: I support this proposal: ADF&G already has the ability to restrict area and time. Unneeded regulations tie the hands of the managers of the fishery. Mandatory closure language is not of the best interest of the resource or its users.

Proposal 29: I strongly oppose the passage of this proposal. ADF&G already has the tools to restrict time and area by emergency order as they see fit. This is nothing more than a grab for reallocation of the King Salmon resource from one user to another in a fully allocated resource.

Proposal 30: I oppose this proposal. Grass banks are a moving boundary and in today's age of electronic navigation there is no reason not to have a set line for both the users and enforcement.



Proposal 31: I oppose this proposal: This is just an attempt of reallocation of the resource between user groups. The economic harm and the head ache for management are just two of the reasons to decline this proposal. Management's data base and information is based upon a fishery using the same kind of gear for many decades. The economic hardship would be in requirement of new gear for a short time period to the commercial fleet. I do not believe that it would have any positive factor in the King catch. It most likely do the opposite as the commercial fleet would be forced into shallower / more dangerous waters in order to catch the early Sockeye and this would most likely mean a larger catch of King salmon.

Proposal 32: Strongly oppose this proposal. ADF&G should be managing on abundance based knowledge not forecast predictions. Predictions are just that not knowledge. As evidence in incorrect management the 2017 King run in the Copper River was well above any preseason forecast. Mistakes were made in management of both the sport and commercial fishery by managing on preseason forecast modes instead of abundance based management. For the good of the resource and all users the managers need the flexibility of abundance based management, not regulations that tie their hands.

Proposal 33: Oppose this proposal. What this proposal suggests is that any King Salmon caught (dead or alive) by the commercial fleet must be thrown back into the ocean and be wasted. The submitter of this proposal indicates that the catch of King Salmon in the Commercial fleet is only incidental. This is an incorrect assumption. King Salmon have always been a part of the commercial catch since records have been kept. King Salmon is in no way just an incidental harvest but part of the whole and always has been traditional and regular part of the catch. The commercial fishery has already given up King Gear and early area inside the barrier islands. This is again an attempt to reallocate from one user group to another.

Proposal 34: I oppose this proposal. In participating in the commercial salmon fishery on the Copper for over 35 years I have seen many different river conditions. The data base that ADF&G uses is based upon information from many sources. One of those sources is the sonar counter at Miles Lake. Another early indicator and data provider is the catch of the fleet in the early part of the run. This data provides early indications of the strength of the run. The sonar counter is 5 to 9 days upriver from the fishery. The department limits the commercial fleet early and uses that data to make management decisions by comparing to prior year(s) data. Do not tie the hands of the managers with unneeded regulations when by far the management of the runs on the Copper River have been for many decades working well with healthy salmon runs. Another attempt to reallocate part of the run from one user group to another.

Proposal(s) 35 & 36: Oppose these proposals. The department has the tools to manage the fishery without undue regulations that tie their hands in abundance based management.

Proposal 37: I support this proposal: This is an area that was prior to it being taken away from the commercial fleet traditional fishing area. There is no data that I know of that shows this fishery was impacting any other area in AK. With loss of inside water of the barrier islands it would assist in returning productive area to the commercial fleet.

Proposal 40: Oppose this proposed regulation change: There is already regulation in place for the distance between gear types in the Crafton Island Subdistrict. The Set Net Fishers already have upon them restrictions under the PWS Enhanced Salmon Allocation Plan for exceeding their % of catch and have limited time assessed to them by this Allocation Plan. Making a larger area unavailable to the drift fleet would only increase this issue.

Proposal 41: I oppose this proposal. By regulation a set net must be attached to the Main Land Shore. It is my belief that any Set Net in the district affixed to pinnacles are most likely not legally set. By passing this proposal the Board would be in essence condoning the illegal setting of Set Net Gear. I believe that the Board should review the Main Land Shore regulation and seek advice from Enforcement as to the legal setting of the Set Net Gear in this district.

Proposal 42: I support this proposed regulation change: It seems that "Fish do tend to run the beach" in all fisheries. By limiting the access to all traditional beaches the drift net fleet does not have access to traditional catch areas. Set Net Fishers have additional lines and bouys that are nothing more than blockers and have no intention of setting nets on those sites just keeping the Drift Fleet off the beach.

Proposal 43: I support this proposal: If lines had bouys do not have a net set on them and a drift net operation sets their net there they are legal to fish. However once set if a set net is then later depolyed onto those lines and bouys the Drift Net operation is instantly illegal. Without some time to be able to remove the net there could be a citation issued by enforcement. If the drift net has any amount of fish already caught it could take some time to retrieve the net. However the way the regulation is written it is an instant violation once the set net is deployed. Deploying the set net can be done in very little time and picking the drift net could some times require additional time to get picked. This disparity needs to be addressed.

Proposal 44: I support this regulation: In the regulations as I understand them the permit holder must be on site when fishing operations are in progress. I believe that hired crewmembers are not allowed to set or retrieve gear unless the permit holder is present. I believe that this needs to be clarified in regulation for the Set Net Operations.

Proposal 45: I support this proposal. I have been fishing for many years in Area E as a Drift Gilt Net Fisherman. I have seen the increase of sites with bouys and lines in place that never seem to have nets deployed upon those said lines. If the regulation was that the Set Net Fisher could only deploy lines and bouys for four sites then it would eliminate the blocking sites that have been become common place in this fishery.

Proposal 48: I oppose this regulation change. This "Chum" fishery is in violation of the adopted enhancement plan. It also is not actually a



"Chum" fishery as the seine fleet in the AFK terminal fishery is intercepting not only wild stock sockeye but enhanced and bound for Gilnet districts in PWS. The Gilnet fleet in recent years have had area and time restricted in order to protect wild stock sockeye but the Seine fleet in this fishery are intercepting Sockeye in larger numbers. I encourage the Board to look closely at the Prince William Sound Salmon Allocation Plan to see if the fishery is in compliance with that plan before making any boundary or regulation changes.

Proposal 49: I support this proposal. Please see my comments in opposition to Proposal 48 in regards to this matter. The PWS Salmon Allocation Plan has been adopted and the AFK Seine fishery is in violation with that adopted plan.



Submitted By
David Blount
Submitted On
11/16/2017 10:40:53 PM
Affiliation
Drift gillnet operator

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Box 1912
Cordova, Alaska 99574

Board of Fisheries

I would like to register my strong opposition to proposal 10. The proposed increase in escapement of sockeye on the Copper River is unjustified. Current escapement levels have maintained a sustainable and healthy fishery. This is not the way to manage for King escapement. There are many holes in the King management process, most of which hinge on a total lack of information on harvest upriver. Simply allowing more sockeye up river would do nothing for king management and have a very negative impact on the economy of Cordova.

Thank you for your time

David Blount

Cordova

Submitted By
David Blount
Submitted On
11/16/2017 10:29:14 PM
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Drift gillnet operator

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Box 1912
Cordova, Alaska 99574

Board of fish

I support proposal 13 based on the fact that dipnetting from boats is not a traditional practice. This method is much too efficient and puts an added burden on management.

Thank you for your time

David Blount

Cordova AK



Submitted By
David Peterson
Submitted On
11/14/2017 9:22:25 PM
Affiliation

Board of Fisheries:

The following are my views regarding propositions affecting the Copper River fisheries:

SUPPORT Prop #s 10, 17, 18, 28

OPPOSE Prop #s 13, 14, 15, 16, 23, 36



Submitted By
David Tarcy
Submitted On
11/14/2017 10:21:52 PM
Affiliation

Dear Alaska Board of Fisheries:

I am writing to oppose Proposal 13, to prohibit dip netting from a boat on the Copper River. State subsistence is for everyone, not only for traditional users, so I don't see how the traditional means argument applies here. I would also say that the use of electronics on those boats really does not increase efficiency or effectiveness of dipnetting.

David Tarcy
Anchorage



Submitted By
Dennis M. Zadra
Submitted On
11/15/2017 2:52:15 AM
Affiliation
Area E Drift Gillnetter

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907-253-3718
Email
dennis@idohuntak.com
Address
PO Box 2348
Cordova, Alaska 99574

November 15, 2017

Dear Mr. Jensen and Members of the Board,

My name is Dennis Zadra and I have been gillnetting on the Copper River for 25 years. I appreciate the opportunity to comment specifically on Proposals 32,33 and 34.

These proposals are mean spirited and came about after a very poor and highly inaccurate prediction of king salmon returning to the Copper River in 2017 by the Alaska Department of Fish and Game. All user groups were severely restricted including the commercial fleet with further loss of area and time in which to fish. However, the run came in much stronger than forecast, which was apparent from the first opener. We continued to fish under these restrictions for the entire king season in spite of evidence that the king run was strong. After seeing the evidence of a strong run, Fish and Game lifted the restrictions on all upriver users. The conservation burden of this inaccurate forecast was placed entirely on the commercial fleet, and it was very costly for me and my family.

Fish and Game needs accurate data for in season management, and the best source of that data is the commercial fishermen in the beginning of the season. However, it is hard to compare that catch data to previous years when we are now fishing less time and less area. My time and area opportunity to catch king salmon is about 10% of what it was when I started fishing in 1992.

The bigger picture here is the misconception that the rest of the State has regarding the commercial Copper River Salmon Fishermen. I see from the articles and comments that most people have no idea what actually happens in this fishery. I encourage you to exercise your due diligence in making sure you have accurate information about our fishery, and realize the decisions you make severely impact the entire community of Cordova.

Thank you for the opportunity to express my point of view.

Sincerely,

Dennis M. Zadra

F/V Raging Bull



-----Original Message-----

From: Doron Partyka [mailto:doronpartyka@gmail.com]

Sent: Monday, November 13, 2017 10:26 PM

To: LTGOVopns (GOV sponsored) <ltgov.opns@alaska.gov>

Cc: craig Partyka <craigpartyka@gmail.com>; cderrick@chitinadipnetters.com

Subject: Online Public Notices

I am a member of the Chitina Dipnetters Association and wanted to comment on the proposals being considered.

My husband, Craig Partyka and I have been dip netting for over 20 years and have had the great pleasure of enjoying Salmon virtually all of our years living in Alaska. Two years ago, our son was initiated into dip netting and am certain we will continue the tradition. We have the dip netters association to thank for that and am happy to comment on the proposals being put forward.

We support Proposal 10

We support Proposal 13. While we understand that dip netting from a boat has become the preferred method for many, we feel it gives high technology an unfair advantage compared to those who enjoy the more traditional methods. Also, it is our experience that when there is a boat near our fishing hole, the run slows down substantially. We have also seen a high percentage of injured fish when there was a boat nearby.

We do not have enough information to form an opinion regarding Proposal 15. We have always used nylon and so have no experience with monofilament nets. Generally, though, we support the science. If it is bad for the fish, let's fix the problem and do away with the offending nets.

We oppose proposal 16. We believe that the person who does the fishing should be responsible for logging his or her harvest. Putting it upon the Charter company is really asking the private business to be the police. Of course they will pass that cost on to their customers.

We support proposal 17. Allowing more dip netting locations is our preference to allowing dip netting from boats.

We support proposal 18.

We oppose 28 and want mandatory closures when our Salmon runs are threatened.

We oppose Proposal 36. If the Department of F&G determines a closure is warranted it should have the authority to do so.

Thank you for the opportunity to submit comments on the aforementioned proposals.

Kind regards,

Doron Partyka



Submitted By
Doug Hoffmaster
Submitted On
11/16/2017 11:30:01 AM
Affiliation

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Anchorage, Alaska 99504

When is enough going to be enough with the Ahtna Corporation attacking the rights of ALL Alaskans for their own personal gain. They have tried to cut off access to the Klutina River and now they're digging their hands into the Copper River. I am sure if we paid them a fee to dipnet from a boat, they'd have no issue at all allowing its use. I have fished the Klutina and Copper Rivers since moving to Alaska in 2002. I have taken the charter service and dipnetted several times from a boat as well. In fact my last excursion from a boat was this past season. This river sees a return of sockeye salmon in the millions. Dipnetting from a boat allows subsistence and personal use residents a chance to harvest some of Alaska's treasures.

Another thing to consider is the safety factor. Let's face it, the Copper River is an unforgiving river. If you fall in, odds are you not coming in...alive. Dipnetting from a boat allows a greater margin of safety. One you have to wear a life vest, something not required when hanging from the side of a cliff with a dipnet. Two, if you do fall in the river there is a boat right there to attempt a rescue. It's really a matter of common sense.

I am opposed to Propositions 13, 14, 15, 23, and 36 in their entirety.



Submitted By
Emma Owecke
Submitted On
11/15/2017 5:49:49 PM
Affiliation
Permit holder- PWS setnet

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Address
W25376 Sullivan Rd
Trempealeau, Wisconsin 54661

My name is Emma Owecke and I have been setnetting in Prince William Sound for 8 years. For the past 4 years I have been a permit holder. Prior to working as a deckhand I lived in Prince William Sound for every summer since I was four. In the time since then, I have watched tension and chaos between drift and setnet gear escalate to a state that is unable to be managed by the law. Proposals 42 through 45 create situations that heighten the inability of law enforcement to regulate the fishery. Regulation of these proposals would be nearly impossible and increase the conflict between gear groups. Additionally, they are extremely allocative proposals. I oppose proposals 42 - 45.



Submitted By
Eugene McCabe
Submitted On
11/15/2017 7:23:05 AM
Affiliation

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2500 Maylen Circle
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Prop #10 - Support

Prop #13 - Oppose. The proposal is based on an assumption that is simply false. Boat dipnetting on the Copper in the Subsistence Area is no different than the Kenai River. Schools are not targeted and depleted quickly. The boats are drifting the current, and make runs exactly like the Kenai. "Quickly getting limits" is a myth... where? I've worked all day long pulling up empty dip nets, and NEVER limited (except for kings) on the river. The proposal makes it sound like nets are coming up full of salmon, and there is simply no supporting evidence this is true, and I certainly have not seen this. Boat dipnetting is hard work, and in the end, much safer than bank dipnetting and has the same limits. If the limits are too high, correct the limits, not the method of take.

Prop # 14 - Oppose

Prop #15 - Oppose

Prop#16 - Oppose

Prop#17 - SUPPORT

Prop#18 - SUPPORT

Prop#23- Oppose

Prop#28 - SUPPORT

Prop#36 - Oppose

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

15 November 2017

Chairman John Jensen
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

Re: Comments from the Native Village of Eyak on 2017 Prince William Sound and Copper River finfish proposals 6, 10, 13, 15, 16, 17, 23, 24, 27, 28, 29, 30, 31, 32, 33, 34, 37, 39

Proposal 6: 5 AAC 28.267. Prince William Sound Pacific Cod Management Plan. SUPPORT

This is a common sense proposal that would reduce waste of two commercially valuable species, Pacific cod and Pacific halibut. It is understandable that a directed fishery would close when bycatch reached a threshold, as is the case with the Pacific halibut ground fishery, however it is unnecessarily restrictive to force a holder of both a Pacific cod permit, and Pacific halibut IFQ to return either species to the water during the open season if caught on the same gear, regardless of which species the fisherman is targeting. This will allow fishermen to retain more value for their work, and prevent the waste inherent to releasing these species.

Proposal 10: 5 AAC 24.360. Copper River District Salmon Management Plan. OPPOSE

The proposal bases its recommended action on two fabrications:

1. The indication that the Sustainable Escapement Goal (SEG) for sockeye salmon on the Copper River is “artificially low” is without any evidence. The basis being used for comparison, the drainage area of the Copper River vs. the drainage area of the Kenai River, which has a larger Optimal Escapement Goal (OEG), has no biological or conservation relevance. The Kenai River’s OEG was determined through a process that could be applied to the Copper River to determine an OEG, but borrowing the Kenai River’s OEG, simply because the Copper River drains a larger area would be arbitrary and irresponsible.
2. The indication that a low SEG for sockeye is “cited” (no citation provided) as a reason to continue to exploit Chinook salmon co-migrating with these sockeye is simply 180 degrees backward. Copper River Area E Drift Gillnet Managers limit commercial harvest

10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

opportunity for sockeye salmon in order to meet Chinook salmon escapement goals (Botz 2016). The Copper River Chinook salmon harvest is a directed, fully allocated harvest, independent of the sockeye harvest.

Thus, this proposal must be rejected.

Works Cited: Botz, Jeremy. 2016. personal communication.

Proposal 13: 5 AAC 01.620. Lawful gear and gear specifications. SUPPORT

Subsistence opportunity is important to Alaskans as they use these resources to gather food that will sustain their families throughout the year. However, it is important that these opportunities occur using traditional methods and means to harvest these resource. The Ahtna are the keepers of this traditional knowledge in the Copper Basin, and their grievance with the non-traditional use of boats as a platform for dipnetting salmon must be respected. Furthermore, because Chinook tend to migrate farther off the bank than sockeye, this regulation would decrease the likelihood of intercepting Chinook.

Proposal 15: 5 AAC 01.620. Lawful gear and gear specifications and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. SUPPORT

Monofilament used in dipnets on the Copper River results in the inability to effectively release Chinook salmon while minimizing harm during emergency closures. The Personal Use fishery on the Copper River is one that allocates excess salmon to Alaskans. In recent years, low abundance of Chinook salmon has precluded Chinook salmon from being taken in the Personal Use Fishery; however, regardless of in-season closures the same number of Chinook are still caught, handled, and released due to non-selective gear, compounded by occluded glacial water. When monofilament is used on a dipnet fish become entangled in the mesh, often injuring their gills in the process, which is almost certain to cause death, even on a fish released alive. Furthermore, many dipnet locations are in precarious areas where the captured and tangled fish needs to be dragged out of the water, along a rock face, untangled on shore or in the boat, then rolled back down into the water, this is a very abrasive release with high potential for resulting post release mortality. It is altogether different from having nylon mesh where a fish intended for release can simply be flipped out of the net without the need to drag, hold down, untangle, and roll the fish back into the river We support the use of knotless seine webbing in all dipnets used in the

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Copper River so that Chinook salmon can be returned to the water when necessary for conservation.

Proposal 16: 5 AAC 01.xxx. New Section and 5 AAC 77.xxx. New Section. **SUPPORT**

This proposal is very strong, conceptually, and if adopted would certainly provide good data. Moreover, there are several operations on the Copper River that provide “water taxi” service with transporter’s licenses to provide access to the fishery. This is different from a formal fishing guide service which does have some reporting requirements, and these do exist as well, however the proposal would provide consistent reporting requirements for the different types of services accomplishing basically the same thing: harvesting salmon.

Proposal 17: 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. **OPPOSE**

The Native Village of Eyak, the organization responsible for providing the inriver abundance estimate of Copper River Chinook salmon each year, strongly opposes this proposal because it has the potential to negatively impact the mark-recapture data used to produce an inriver abundance estimate, from which total run size and system-wide escapement are derived.

Opening Chinook harvest between our mark and recapture project sites on the Copper River will violate several assumptions of the mark-recapture study by extending the open harvest area into and below the project recapture event area (Canyon Creek Camp). This recapture project area was purposefully chosen due to it’s location below the boundary line of the Upper Copper River district.

A directed harvest between Baird Canyon Camp (the marking site) and Canyon Creek Camp (the recapture site) will create the potential for uneven harvest distribution of marked and unmarked Chinook salmon, an issue which is compounded by the presence of NVE’s long-running tag return contest (which has promoted the removal and retention of tags, a non-issue if harvest occurs outside of the project area).

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Additionally, the presence of active fishing occurring from shore or in boats within the vicinity of the project fishwheels will impact the CPUE of NVE's project fishwheels, thus lowering NVE's sample size.

Furthermore, and perhaps the most detrimental to the project will be tag loss below the recapture site. NVE's external dorsal dual T-bar PIT tags have a high rate of retention between the two project sites because no net fishery exists in this area. External tags are preferable because they are unobtrusive, provide a cost savings, and minimize handling time of tagged Chinook salmon; however, external tags are highly susceptible to becoming dislodged when tangled in a net. The presence of a net fishery below NVE's mark recapture site will result in an increased amount of primary tag loss; while, secondary marks (operculum hole punch) will be retained critical data will be lost. Chinook salmon recaptured containing only a secondary mark cannot be linked to the Baird tagging site dataset (e.g. tagging date/time and migration time between camps); therefore, these fish cannot be accurately assigned to a strata during post season analysis. The inability to assign a tagged Chinook salmon to a strata will at best lower NVE's marked and recapture sample size (falsely increasing population abundance), or if tag loss is significant will prevent NVE from determining the inriver abundance estimate within established accuracy and precision goals, preventing the calculation of total run size and system-wide escapement.

Beyond the impact on data this proposal would require boat access to harvest salmon with dip nets, as the area to be opened is a wide, braided section of river with many shallow channels. This is a phenomenally difficult section of the river to navigate. We have participated in multiple rescues in this section of river, even though it sees very little traffic. A large proportion of the boats that go into this area become stranded, so the proposal presents a real Public Safety concern. Add to that the fact that the existing open area above Haley Creek has been treated so poorly by its users with litter and human feces left everywhere, it seems irresponsible to subject such a pristine area to this treatment.

Finally, this expanded area would not increase the number of fish a user would have access to. These fish are migrating upriver, and so every fish that could be encountered in the expanded area could also be encountered in the area currently open to fishing.

Proposal 18: 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan. OPPOSE

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This proposal is a thinly veiled attempt to re-allocate resources from the commercial fishery to the Personal Use fishery, regardless of harvestable surplus.

Proposal 22: 5 AAC 77.5xx. Personal use herring fishery and 5 AAC 77.570. Waters closed to personal use fishing. **OPPOSE**

This proposal is completely out of step with the current state of the herring resources in Prince William Sound. All evidence indicates that this stock remains impaired, and is not recovering from the Exxon Valdez Oil Spill. NVE's position is that herring harvest should remain the same or be reduced in Prince William Sound. An additional fishery simply cannot be sustained by this resource.

Proposal 23: 5 AAC 52.022. General provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area. **SUPPORT**

The Native Village of Eyak strongly supports this proposal and is in opposition of any catch and release fishing. It is disrespectful to play with your food, and catch and release fishing is exactly that. Our salmon resources are here to provide nourishment and there is no deeper tradition than that of using salmon for sustenance. In over 10,000 years, these fish have sustained the people here, and only in the last hundred or so has the non-traditional practice of harming these fish for fun been adopted by some. It is not traditional to do this: it damages the resource, is disrespectful to the fish and should be prohibited.

Proposal 24: 5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area. **SUPPORT**

We support sport fish closures for sockeye salmon in the Gulkana River drainages to conserve sensitive sockeye stocks

Proposal 27: 5 AAC 55.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Prince William Sound Area. **SUPPORT**

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In anticipation of increased access and use from the development of the Carbon Mountain Road, two regulatory changes occurred on fisheries in this area of the West Copper River Delta. The two regulatory changes proposed and approved by the Board were the establishment of the Copper River Delta Special Trout Management Area in which no trout retention was allowed, and the establishment of a boundary line at the carbon Mountain Bridge eliminating salmon fishing above the bridge.

The Carbon Mountain Road project was abandoned and the area of mining interest is now protected in perpetuity. Additionally, the Copper River Highway has washed away at the 36-mile bridge; therefore, the West Copper River Delta, where Clear Creek and the Special Trout Management area exist are now remote and relatively inaccessible

Use of the West Copper River Delta did not increase as originally anticipated but has actually decreased, and because of this the West Copper River Delta Special Management Trout Area was opened to the retention of trout by the Board of Fish in 2014 with even more liberal size limits than the Eastern Copper River Delta. To follow suit Mr. Borer has recommended that the area above Carbon Mountain Bridge be re-opened to salmon fishing. While this recommendation has valid points based solely on the change in access and use patterns, the fact that the legal fishing area below the Carbon Mountain bridge has now become occluded with glacial waters from the Copper River is further reason why the area above the bridge should be opened to salmon fishing. With the current state of the Copper River intersecting Clear Creek no legal and fishable areas exist essentially closing Clear Creek to salmon harvest. Clear Creek should have open and fishable waters available for the few people who live on and venture to the Western Copper River Delta.

Proposal 28: 5 AAC 24.361. Copper River King Salmon Management Plan. SUPPORT

Inside water closures have been used to reduce the proportion of Chinook salmon harvested in the Area E commercial drift gillnet fishery on the Copper River Flats. While it is possible that this does provide a conservation benefit, this is an assumption based upon anecdote and should be thoroughly tested to verify that inside closures do provide a conservation benefit. However, this does not need to be set in regulation. Managers have the authority to reduce fishing area and time and the expanded inside closure area adopted in the 2017 season on the Copper River Flats is evidence that that have, and will use this authority. It is simply not necessary to limit their authority to fish the inside if they deem it appropriate.

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Proposal 29: 5 AAC 24.350. Closed waters. OPPOSE

The use of inside closures to limit the capture of Chinook salmon in the Area E Drift Gillnet fishery is based on anecdotal evidence and assumption. While it could have some merit in terms of a management strategy, it is as or more likely that time restrictions provide a better means of conserving Chinook salmon. There is no evidence that this action would reduce the number of Chinook salmon harvested, however it would make the fishery vastly more dangerous, and cause the loss of life and property as it did when managers imposed similar area restrictions in the 2017 season.

Managers have the ability to limit fishing area in season, and have demonstrated their willingness to use this ability. There is no need to require these restrictions when managers can impose them if necessary.

Proposal 30: 5 AAC 24.350. Closed waters. SUPPORT

This proposal is similar to Proposal 28 and we support it for the same reasons.

Proposal 31: 5 AAC 24.331. Gillnet specifications and operations. OPPOSE

This proposal is predicated upon the incorrect assertion that Copper River Chinook stocks failed to meet escapement goals in 2017 as we at the Native Village of Eyak have yet to release an escapement number for 2017. Rather, this proposal seems preoccupied by the very questionable preseason Chinook forecast that was released for this fishery prior to the 2017 season. The conclusions reached about the inability of other user groups to fish are unwarranted and did not occur, and altogether, this proposal assumes this forecast was accurate (it was not) and creates issues to remedy that do not exist.

There is no evidence to indicate that shallower nets would reduce Chinook harvest in this fishery. In fact, subsistence users in this area often use a shallower net to TARGET CHINOOK.

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Proposal 32: 5 AAC 24.361. Copper River King Salmon Management Plan. OPPOSE

This proposal is predicated upon the incorrect assertion that Copper River Chinook stocks failed to meet escapement goals in 2017 as we have yet to release an escapement number for 2017. Rather, this proposal seems beleaguered by the very questionable preseason Chinook forecast that was released for this fishery prior to the 2017 season. The conclusions reached about the inability of other user groups to fish are unwarranted and did not occur, and altogether, this proposal assumes this forecast was accurate (it was not) and creates issues to remedy that do not exist. Further, it makes the assumption that a pre-season forecast generates a formal harvest allocation, which is not the case. The forecast is simply a tool available for managers to create a pre-season strategy and manage the first commercial opener, after which, ADFG works on abundance-based management.

Generating an in-season Chinook escapement estimate would alleviate most of these issues.

Proposal 33: 5 AAC 24.361. Copper River King Salmon Management Plan. OPPOSE

This proposal, while properly identifying subsistence users as the priority for allocation conflates forecast and abundance. In the example provided in the proposal, the 2016 season yielded a large harvest in the commercial fisheries, however subsistence fisheries were not reduced despite the escapement goal not being met. In the 2017 season, a very poor Chinook forecast caused ADFG to impose misguided restrictions upon all fisheries, including subsistence and commercial fisheries preseason. However, by the time the subsistence fishery opened these restrictions were lifted resulting in no restrictions on any subsistence users. Had this proposal been in place during the 2017 season, managers would have been precluded from carrying out abundance-based management. The pre-season forecast was not accurate, but the restrictions imposed would have been very real, and totally unnecessary.

Proposal 34: 5 AAC 24.310. Fishing seasons. OPPOSE

The requirement that salmon be counted on a sonar that is dozens of miles upriver through a very complex aquatic system that has great variability in the timing of breakup to be harvestable in the ocean is unnecessary. Ice sometimes prevents fish from migrating upstream to the sonar station in the early season, however this obstacle to migration has

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absolutely nothing to do with salmon abundance. There are numerous other sources of data to evaluate the salmon run pre-season including lower river sonar managed by a private group, and educational fisheries that harvest salmon prior to the commercial opener. Moreover, this first opener that could precede any salmon on the sonar is itself an important piece of data for evaluating the early salmon run. In the recent past when this has occurred, it coincided with very good salmon abundance, and managers opted to keep the fishery closed after the first opener precisely because no salmon had been detected on sonar. The result was a huge number of salmon getting upriver and that salmon was not harvested. This proposal would do nothing but cause enormous harvest opportunity to be foregone.

Proposal 37: 5 AAC 24.350. Closed waters. SUPPORT

We support this proposal as it would expand a rapidly shrinking fishing area, as well as provide the opportunity through ADFG sampling to determine conclusively whether this area should be open or closed due to intercepting fish allocated to a different fishery. We agree that this area was closed based on assumption and anecdote in the 1980s and reopening this part of the Copper River flats would provide the opportunity to conclusively determine the origin of the fish caught here. But the final decision about whether this area should be open during a given fishing period should be left to managers and based on the best data available. Accepting this proposal would allow ADFG to use its discretion on opening this area if the fish there were found to be destined for the Copper River.

Proposal 39: 5 AAC 24.332. Seine specifications and operations. OPPOSE

We believe that allowing permit stacking would consolidate the fishery and make it less accessible for new young fishermen wanting to enter the industry.



Greetings Ms Pilcher,

I am writing to express my opposition to ACR01 which seeks to undo the 3-mile restriction on subsistence Northern Pike fishing in the Chatanika River near the mouth of Goldstream Creek which was recently expanded by the Board of Fisheries. The closed area was expanded to 3-miles in order to protect larger fecund female Northern Pike that overwinter in this area of Goldstream Creek and the Chatanika River. It seems prudent to leave the approved 3-mile restriction in effect long enough so that any effects on the Northern Pike population could be measured by the ADF&G. The larger closed area has only been in effect for one year and I believe that it would take several more years for beneficial effects of the closure to be observed in the affected population.

I would therefore ask that the Alaska Board of Fisheries not approve ACR01.

Sincerely,

Fred DeCicco
Fisheries Biologist retired
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Submitted By
Glenys Burdick
Submitted On
11/14/2017 10:49:15 PM
Affiliation

Prop #10-SUPPORT
Prop #13-OPPOSE
Prop #14-OPPOSE
Prop #15-OPPOSE:
Prop #16-OPPOSE
Prop #17-SUPPORT
Prop #18-SUPPORT
Prop #23-OPPOSE
Prop #28-SUPPORT
Prop #36-OPPOSE



Submitted By
Holly Herring
Submitted On
11/14/2017 9:41:28 PM
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Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
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11/12/2017 6:06:38 PM
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I support proposal 26.

Bow fishing for Pink and Coho Salmon would be a great addition in economic value as more visitors with archery skills would visit Valdez and it's small businesses. Including bow fishing for these two species shouldn't effect the numbers of fish in the terminal harvest area.

Thank you for including my opinion,

Hope Roberts

Valdez Resident and Native Tribal member



Submitted By
Ian Williams
Submitted On
11/16/2017 10:42:17 PM
Affiliation

To whom it may concern,

I am a commercial set gillnetter in the Eshamy district. Here is my submission for approval or opposition of proposed regulation changes for the Eshamy district and area's that may impact the Eshamy district.

Proposal 40 Approve

- This regulation change would hopefully reduce the amount of conflict between Drift gillnetters and and set gillnetters in the Crafton Island subdistrict, especially in tighter area's like small coves and bays where fishermen are grouped together.

Proposal 41 Oppose

- This proposal is unenforceable. There is no way to clearly define what a "pinnacle" is. Many "pinnacles" can only be seen at low tides or be interpreted as points off the shore. How can law enforcement enforce it? How can distance between legal and non legal gear be enforced?
- This proposal would also increase conflict between Drift and Set gillnetter's as some drift fisherman would try and use it as a way to fish closer than the required distance to set gillnet gear while they are attached a shoreline.
- We would risk losing any harvest buildups from shore tie to the beach. Drift gillnetters have more ability to maneuver around fishing districts than set gillnetters who are in fixed locations and cannot round hall like the drift fleet can.
- It grants the drift fleet access to historical set net beach area

Proposal 42 Oppose

- This proposal is unenforceable. There is no way to clearly define what a pinnacle is. Many pinnacles can only be seen at low tides or be interpreted as points off the shore. How can law enforcement enforce it? How can distance between legal and non legal gear be enforced?
- This proposal would also increase conflict between drift and set gill netters as some drift fishermen would try and use it as a way to fish closer than the required distance to set gill net gear while they are attached to a shoreline. We would risk losing any harvest buildups from shore tie to the beach. Drift gill netters have more ability to maneuver around fishing districts than set gill netters who are in a fixed location and cannot round haul like the drift fleet can. It grants the drift fleet access to historical set net beach area.

Proposal 43 Oppose

- This proposal would drastically increase conflict in all areas. The drift fleet already knows that when a set gill netter arrives and attaches to a site, it is time for the drift gill netter to retrieve their gear and move to a legal fishing area or zone. Allowing this to pass would allow the drift fleet an excuse to take longer than needed to retrieve their gear, hindering the set gill netters chance to catch the harvest in a timely manner.
- **I counter and ask that the regulation book state that when a set gill netter arrives at a fishing site that a drift gill netter must retrieve their gear immediately and without delay. This would decrease conflict and increase safety for all involved.
- Generally the drift fleet has ample time to retrieve the gear after a set gill netter arrives at a fishing site as it is.
- There would be no way to enforce this. There would be no way to clearly define how much time is sufficient for a drift gill netter to retrieve their gear. Stating that they should do so immediately would remove any question as to how soon a drift gill netter should retrieve their gear and move to legal areas or zones.
- This proposal also falsely portrays set gill net crew as fishing illegally. According to 5AAC39.107(d) it is legal for set gill net crew members to operate set gill net gear.
- This would increase conflict between drift and set gill netters as it would allow both to operate concurrently on the same site.

Proposal 44 Oppose

- This is an Invalid proposal. According to statute 5AAC 24. 331(b)(3) 5AAC 39.107(d) and 5AAC 39.110(c)(e)
- After set gillnetters set their gear, drift gear would already be set on a set gillnetters second and third sights increasing conflict once again.

Proposal 45 Oppose

- Due to managment chages by ADFG that have been taken place to the Eshamy District over the last couple of years the set netters have had to drop more anchors than normally necessary to stake claims outside of their normal fishing area's as they have had no idea where they will be allowed to fish on any given opener.
- This proposal if passed would force set gillnetters to retrieve anchors, buoy's and lines during bad weather, which would endanger them



- Forcing set gillnetters to retrieve and reset buoy's, anchors and lines every opener would also cause conflict possible gear interference.
- Having a site claimed with signs, anchors, buoy's and lines has never stopped a drift gillnetter from fishing in that area while a set gillnetter is not using said site.

Proposal 48 Oppose

- This fishery has been intercepting fully allocated Main Bay sockeye salmon as well as Coghill sockeye salmon. We propose that this goes back to a cost recovery fishery until July 18th.



Submitted By
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11/14/2017 8:16:05 AM
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To Chairman Jensen and members of the Alaska Board of Fisheries,

My name is James Mykland and I have been a commercial fisher, based out of Cordova, since 1977. My comments on these proposals, are my views only.

#29: I am in opposition to this proposal. The Copper River Chinook, is part of the commercial harvest, and it is not or has ever been an incidental catch. Due to a 2017 lower ADF&G than average Chinook forecast, the local department managers, used time & area management, which included a new expanded closure line, this season. This new tool, was successful, and produced the required SEG for the 2017 Chinook return. The local department has the means and tools already, to make sure the sustainable goal is met, each year. No mandatory restrictions are necessary, at this time.

#31: I am in opposition to this proposal. The local department already has the means and tools to limit harvest of Copper River salmon returns, by the commercial fleet, if the SEG, of all different species, is in danger of not being achieved.

#32: I am in opposition to this proposal. My view is the same as in regards to #31. If there is an issue with sustainability of any of our Copper River Salmon returns, the local department has all the tools they need to restrict the commercial harvest. During the month of May, CR Chinook and Sockeye return to the CR, during the same timing. The majority of these salmon return between May 15th to June 15th. The commercial fleet depends on this time to provide economic benefits to their families. The municipality of Cordova, depends the dollars paid to fishers, which are multiplied by four times, in the local economy. The PWS/CR drift fleet, has the highest residency participation, in the State, which is over 70%. The commercial fishery is the backbone of Cordova's economy.

#33: I am in opposition to this proposal. There is nothing incidental about the Chinook harvest by the commercial fleet on the CR. The harvest of both Chinook and Sockeye happen at same timeframe. If there is a sustainability issue, the local department managers will be able to respond accordingly.

#34: I am in opposition to this proposal. The average length of time it takes for CR salmon to reach the Miles Lake sonar, is anywhere from 5-9 days, after they have passed by the outer barrier islands, and entered, into the river. If environmental conditions are of concern, in any given season, the local department managers are able to react, and implement restrictions by time and area. The 2017 CR Chinook return, provided opportunity for all user groups to harvest Chinook salmon. The dismal preseason forecast turned out to be just that. a forecast. The Chinook run was a above average return and provided the SEG. The local department managers did their job, and should be commended by all user groups. The department provided opportunity and sustained the run, cannot ask for any better management than that.

#35, 36, 37, 10. I am in opposition to these proposals. The Copper River commercial salmon fisheries are well managed for sustainability, and no needed adjustments or added time and area is warranted at this time.

#47: I am in favor of this proposal. All enhanced salmon, within Area E, need to be included, in the PWS management and salmon enhancement allocation plan. End of story.

Thank you for reading my comments, and good luck on your deliberations.

James Mykland



Submitted By
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11/16/2017 9:27:10 AM
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Prop #10-SUPPORT
Prop #13-OPPOSE
Prop #14-OPPOSE
Prop #15-OPPOSE:
Prop #16-OPPOSE
Prop #17-SUPPORT
Prop #18-SUPPORT
Prop #23-OPPOSE
Prop #28-SUPPORT
Prop #36-OPPOSE



Good Morning,

I would like to express my comments on the Regulation Change on The Minto Flats Northern Pike Management plan. The Proposed Regulation change is not acceptable as that area is a Critical Over wintering Spot for Female Northern Pike of That are capable of spawning. As a Guide and A business owner that operates in Minto Flats. This would be detrimental to many businesses as well as a other that is dependent on those spawning female to reproduce. I believe that the Data that the gentleman submits is limited and skued to look like that this area is the only area to fish. Whereas there are many areas to fish this Subsistence fishery without endangering those spawning females. This is just the easiest to area to catch fish. This area has a Significant impact on the health of the whole of the Minto Fishery. Allowing the area to be reduce to one mile without proper enforcement would have a impact on the pike population. This is a State subsistence fishery area and Not a Traditional use area. This area has only been subsistence since the Mid 90's.

Jason Rivers



Submitted By
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11/14/2017 11:25:25 PM
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I do not support restrictions dipnetting salmon on the Copper River unless prescribed by biologists to support the longterm life of the fishery. I am a resident of the area and substance user and would be impacted negatively if some of these proposals pass.

#10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



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11/14/2017 9:24:34 PM
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copper river salmon belong to all residents of the state, fair and equal opportunity to the resources must remain accessible in all current forms of use to acquire our bountiful resources, do not fold to special interests groups trying to block or limit Alaskans to our given rights to resources.

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
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11/17/2017 1:26:56 PM
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11/17/17

Chairman John Jensen
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK99811

RE: Comments on 2017 Finfish Proposals 40-45, 48-49

Dear Chairman Jensen and Board Members.

I would like to thank the board for the opportunity to comment on the proposal and to participate in oversight of the PWS salmon fisheries.

My name is Joann Thomas. I have been a resident of Cordova for almost fifty years, and I am part of a three generation salmon set-net family in the Eshamy District. My husband, John Thomas, first fished in the Eshamy District in the 1960s, with his older brother who had been setnetting since the late 1940s. We bought two setnet permits in 1982, and raised two daughters at the setnet site. Currently, our two grandchildren and one of our daughters participates in the fishery. As you can see, setnetting is more than a business for our family, but a way of life.

Our long participation in the Eshamy District setnet fishery also gives us the historical insights into the ongoing attempts of the driftnet majority in Prince William Sound to use Board of Fish regulations to drastically limit the abilities of the small minority of setnet permit holders to compete for fish. We are writing in to **oppose Proposals 41-45, 48** and support 49, thus supporting the Prince William Sound Setnetter's Association positions.

As mentioned in the PWSS letter, many of the proposals stem from increased concentration of gear groups in just the Main Bay Subdistrict because of ongoing closures of the entirety of the Eshamy Bay District due to management of wild Coghill Sockeye escapement. Current management has also allowed the Seine fleet not only to target threatened wild Coghill Sockeye, but by allowing for consistent opening of Chenega has also allocated Wild Eshamy Sockeye stock to the Seine Fleet

Setnets were a common form of fishing across both Prince William Sound and the Copper River Delta, the only area currently open to set-netting is the Eshamy District. The placement of the Main Bay Hatchery by the State of Alaska in the 1980s was partly designed to help reinvigorate setnetting that historically had targeted the Eshamy Lake sockeye run and wild pink and chum runs in the district. The Shore Fisheries leases in the Eshamy District date from their establishment by the State of Alaska and our shore set net sites in Eshamy Bay were fished in the 1930s.

Proposal 40: Support

Proposal 41: Oppose

Proposal 42: Oppose

Proposal 43: Oppose

Proposal 44: Oppose We are opposed to overturning the statewide regulations which have worked effectively. Fishery necessitates site based cabin use, leased locations, limited available time and area, These sites are very labor intensive and all participation is necessary.

Proposal 45: Oppose



Proposal 48: Oppose

Proposal 49: Support

Review of ADFG New Releases further show the diminished ability of the setnet permit holder to compete. The opportunity for fishing shows the gillnetter who only fished the Copper River had available 859 hours of fishing. The gillnetter who only fish the Coghill district had 1493 hours of available time to fish. The setnet permit holder had available in the entire Eshamy district 251 hours, reduced Eshamy district 427 hours and 598 hours with Main Bay Subdistrict included. The income estimated by ADFG shows the average setnet permit holder at 53,800, drift permit holder average at 74,200 and the seine permit holder average at 313,500.

Thank you for the opportunity to address the board.



Submitted By
Joel Davidson
Submitted On
11/15/2017 8:46:33 AM
Affiliation
1974

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Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By

Joel Ingersoll

Submitted On

11/15/2017 3:50:36 PM

Affiliation

Support props 10, 17, 18 and 28

Oppose props 13, 14, 15, 16, 23, and 26



Submitted By
John A Miller
Submitted On
11/11/2017 4:42:46 PM
Affiliation

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Proposal 10: SUPPORT. Over escapement is not a concern on the Copper River system. Significantly raise the OEG. The current one raises the possibility of over utilization of Kings.

Proposal 13: OPPOSE. The AHTNA folks have fought tooth & nail for many years the the PU fishery is NOT "customary & traditional ". Now they argue that a long established method of participation in this fishery should be banned because it is NOT customary & traditional? Now it takes some pretty convoluted logic to hold both positions.

Proposal 14: SUPPORT. Upstream as well as commercial harvest of Kings must be somehow reduced. I support almost any restrictions on King harvesting until they can rebuild.

Proposal 15: OPPOSE. If this is a significant problem, which I doubt, it could be more easily addressed by specifying a mesh size.

Proposal 16: OPPOSE: PU harvests, as well as the means, are already recorded on harvest records.

Proposal 17: SUPPORT: And increase the area open to the PU fishery upstream as well. The existing limits crowd too many people in too small an area.

Proposal 28: OPPOSE: See Proposal 14



From: Diane Wiese
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Board of Fish Proposal Comments
Date: Friday, November 17, 2017 4:47:41 PM

To Members of Board Of Fish

My name is John Paul Wiese. I reside at 155 Eyak Drive Cordova Alaska 99574. I was born in Cordova AK in 1957. I have 50 years of Commercial Fishing experience, and have been a PWS Gillnet Permit holder since 1971 and a PWS Seine Permit holder since 1985. We are Commercial fishers, subsistence fishers, sport fishers and personal use fishers. I am on the ADF&G's AC board in Cordova. I am writing to give testimony on a few of the BOF Proposals that may change the regulations in our fisheries and heavily impact the economical aspect of commercial fishing. I could also impact the sport, subsistence & personal use fisheries. I am hoping you all can refresh yourselves and open up to the 1st page of the Commercial Regulations book and look at the true meaning of the ADF&G's Mission Statement. I thank you in advance for the opportunity to testify.

PROPOSAL 10 - I OPPOSE

~Set and optimal escapement goal OEG for Copper River Sockeye Salmon~
Copper River uses sustainable escapement goal to manage Sockeye. SEG's give us more leeway for ADF&G to provide fishing opportunity to all users. We have always targeted King Salmon and have made measures in fishing regulations to lessen chances of catching Kings, allowing more escapement. Kenai River is different by size and number of tributary systems than the Copper River.

PROPOSAL 12 - I SUPPORT

~Require operators of fish wheels without live boxes to be present when in the Glenallen Subdistrict subsistence fishery.~
All users need to support the conservation effort!

PROPOSAL 13 - I SUPPORT

~Prohibit the use of dip net from a boat to harvest salmon in the Glenallen Subdistrict.~
It is neither traditional or customary way of fishing. It is turning into a Commercial Charter business. Commercial fishing in this area is not legal.

PROPOSAL 14 - I OPPOSE

~Modify the season dates of Glenallen Subdistrict Subsistence salmon fishery based on a pre-season King Salmon harvest projection.~
ADF&G already has the authority if the stock is of concern. Anything based entirely on a pre-season forecast is not sound management!



PROPOSAL 15 - I SUPPORT

~Prohibit to use of monofilament or glint best in dip-nets~

Making a smaller mesh size would keep the fish from injuring themselves needed to be released. During a stock of concern season, it would make a dip-net a dip-net again.

PROPSAL 16 - I SUPPORT

~Require a log book for all charters operation in personal use and subsistence fisheries.~

This proposal would help fill reporting requirements in a timely and efficient manner. All users need to be accountable for their actions.

PROPOSAL 17 - I OPPOSE

~Extend lowering the boundary of the Chitna subsistence downstream to the Uranatina River~

This would double the size of the Dip-net area and cause land use issues.

PROPOSAL 18 - I OPPOSE

~Repeals the reduction in maximum harvest level in Chitna subdistrict personal use fishery if the Copper River commercial fishery is closed for 13 or more consecutive days~

This feature in the management plan helps to share the conservation burden. In times of low abundance it would provide more opportunity for subsistence and it would not be prudent to increase the harvest potential for a non-subsistence fishery.

PROPOSAL19 - I OPPOSE

~ Allow salmon to be taken anytime between MAY 1 & NOV 30~

We already have in place regulations for providing opportunity with effective and sustainable methods!

PROPOSAL 20 -I STRONGLY OPPOSE

~ Opening all waters of the Copper River to subsistence April 20 to October 13th~
State budget would never cover the massive cost of enforcement this. We have little enough enforcement as it stands. This will open up much room for illegal activity and much of this fish could end up in commercial markets.

PROPOSAL 23 - I SUPPORT

~Prohibit catch and release sport fishing in the upper Copper River and Upper Susitna River~

ALL catch and release in spawning beds should be prohibited! Catch and release below spawning areas with a single barbless hook may be ok, as long as the is no sock of concern.



PROPOSAL 27 - I OPPOSE

~Remove a closed water provision for Clear Creek~

I oppose all sport fishing in spawning beds!

PROPOSAL 29 - I OPPOSE

~Extend inside closer area to 1/4 mile off S. shore of Barrier Is. Copper River Fishery~

ADF&G already has EO authority to manage. The Kings are part of the directed fishery in the Copper River. Kings are not a stock of concern.

PROP 31 -I OPPOSE

~Reducing the max depth of gear in Copper River District ~

Kings a a directed fishery on the Copper River. Lowering the max depth will put a hardship on commercial fishermen. Chinook are nor a stock of concern. The Copper River Chinook is one of the healthiest chinook runs in the State of AK

PROP 32 I OPPOSE

PROP 33 I OPPOSE

PROP 34 I OPPOSE

PROP 36 I OPPOSE

PROP 38 I OPPOSE

PROP 39 I OPPOSE

PROPOSAL 50, 51 & 52 NEEDS TO BE REVIEWED WITH CHARTS AT BOF

Thank you

John Paul Wiese



Submitted By
John Williams
Submitted On
11/17/2017 9:08:50 AM
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area E fisherman and Cordova resident

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I am a beginner to area E fishing. I leased a permit in 2003 and 2016. In 2017 I purchased an area E permit. CDFU is an important voice for area E fisherman and I support any comments they have on any proposal. I hope that the board of fish will consider the proposals' and continue to keep the commercial Copper River fishery healthy and economically productive for future generations of Alaskans to enjoy.

Proposal 14

Oppose

The 2017 preseason for cast for King Salmon on the Copper River was very low this year and that for cast turned out to not be correct. Which in turned caused all kinds of issues for the commercial fishery and the up river fisheries. There for it is prudent that ADF&G manage with in season information and not set a whole domino affect going by trying to manage preseason off of a for cast that maybe turn out to be very different than actual return.



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11/15/2017 6:46:33 PM
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Cannot and should not happen. Too many families depend on it and supports the local community. DO NOT MAKE THIS MISTAKE!



Submitted By

Jon

Submitted On

11/15/2017 12:06:08 PM

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Support 10,17,18,28

Oppose 13,14,15,16, 23, 36

As a board, when reviewing the potential possibility of shutting down dipnetting from a boat in the subsistence area, think about the impact that will have on small season businesses and the local community as well please.



Submitted By
Joseph Fleming
Submitted On
11/17/2017 9:24:25 PM
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To the Alaska Fish and Game Board, I am a commercial fisherman who has been fishing in Prince William Sound since 1963. I was a Setnetter in Main Bay in 1982 when the Main Bay hatchery opened for pinks. Before that happened all Setnetter's had to stake their sites according to the boundaries Fish and Game had set. A sign was put up at the mouth of Main Bay in a very prominent location off a rock cliff that jutted into the bay. All Setnetter's used that official sign to mark their sites and eventually register them. Then all of a sudden in 2016 Fish and Game officials announced that the real boundary was not at the place of the sign, but further out just at a questionable distance for another set net site. The Setnetter on the line site was given precedence to move out to the new line so he wouldn't lose his line site, but he did not give up his previous line to the second on the line so in essence he had 1st and 2nd leaving the other Setnetter's 3rd and further back in a dominoe effect. This loss of a substantial income to the other Setnetters could have been prevented if the Fish and Game would have honored the official sign they put up in 1982. I am asking the board to return the boundary where they had indicated it was to all the Setnetter's in Main Bay back when all sites were first marked. It is only fair that all fisherman should make a fair income in Main Bay and not just one family. The original sign was put up in a prominent natural point and that is where it should be grandfathered in. All Setnetters would benefit and so would drifters because they would have a safer place to begin their drift into Main Bay. Thank you for considering my proposal, Joseph Fleming



Submitted By
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11/15/2017 9:32:08 AM
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Resident

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Under no circumstance should the copper river be shut down from dipnetting from a boat. The Kenai is a mess and residents have no other options. Native use is getting out of hand and eventually non-native residents wont have a place to go if we continue to limit access to hunting and fishing.

I vote this:

#10 Support

#13 Oppose

#14 Oppose

#15 Oppose

#16 Oppose

#17 Support

#18 Support

#23 Oppose

#28 Support

#36 Oppose



Submitted By

Jutta Pence

Submitted On

11/14/2017 10:05:02 PM

Affiliation

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
Karl Goetzinger
Submitted On
11/15/2017 6:11:28 PM
Affiliation

BOF Proposal 12: Please **accept/adopt** this proposal to assist the long-term effort to enhance the Copper River king salmon runs. Live boxes or attended fish wheels are a very important part of the king salmon conservation effort.

BOF Proposal 16: Please **accept/adopt** this proposal. Log books will increase the accuracy of harvest numbers in the personal use and subsistence Copper River fisheries.

BOF Proposal 18: Please **reject** this proposal. No conservation efforts should be repealed in a time of low run numbers. All Copper River user groups must share in the conservation effort.



Submitted By
Keith Dienstl
Submitted On
11/16/2017 8:59:23 PM
Affiliation

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
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Submitted On
11/14/2017 11:33:03 PM
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As a lifelong subsistence resident of the Copper Basin, I feel that the proposal submitted by the Ahtna Native Corporation, Proposal #13 that intends to shut down all dipnetting from a boat in the Subsistence area would very much negatively impact my household as that is how we dipnet our fish and is a most egregious proposal!

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Kenai River Sportfishing Association Public Comments to the Alaska Board of Fisheries for the Prince William Sound/Copper River meeting

Kenai River Sportfishing Association (KRSA) is a professional 501(c)3 charitable nonprofit dedicated to ensuring the sustainability of the world's premier sport fishing river -- the Kenai. The Association's area of responsibility encompasses the Kenai River watershed, the greater Cook Inlet basin and Alaska, with programs focused on habitat, fisheries management, research and education. Since 1984, KRSA has been a leading advocate for fisheries conservation in Alaska, working diligently to ensure Alaskan's recreational fishery rights are protected and the fisheries are healthy for generations to come.

KRSA is participating in the Prince William Sound/Copper River meeting to contribute to the discussion of Copper River king salmon management.

After a careful review of the both the management strategies implemented by the Alaska Department of Fish and Game (ADFG) during the 2017 fishing season and the Department's revised escapement objective for Copper River king salmon, KRSA has the following comments and recommendations:

- 1) Establish an Optimal Escapement Goal (OEG) with a lower bound of approximately at the mid-point or higher of ADFG's newly proposed Sustainable Escapement Goal (SEG) range of 18,500 to 33,000 fish (mid-point 25,750).**

Currently, the long-term management goal (per ADFG past reports) is 27,000 and the existing lower bound SEG is 24,000.

The lower bound of the OEG would become the new management objective for minimum escapement of king salmon in the Copper River drainage (the current long-term objective is 27,000).

Although the new SEG range would encompass our suggested lower bound OEG, we believe that when implemented, without specific board guidance through an OEG, the lower end of the new SEG range (18,500) will become the de facto management objective for fisheries.

A long-term management objective of 18,500 would represent a **reduction of 31.5 percent** from the existing long-term management target of 27,000 and a **reduction of 25 percent** from the existing lower bound SEG objective of 24,000.

Amid historic statewide declines in king salmon, **reductions** of the Copper River king salmon lower bound escapement goal and the management target by these magnitudes would be **extremely poor public policy and contrary to the Sustainable Salmon Fisheries Policy (5 AAC 39.222)**.

- 2) While arguably a very useful tool in fishery assessment, the assumptions behind and the estimates generated using the state-space model are not without significant levels of uncertainty, especially when dealing with large glacial systems like the Copper River and imprecision of measuring abundance.

Prior to 1999, aerial survey and age-structure modeling are used to estimate Copper River king salmon escapements; since 1999, mark-recapture experiments are used to estimate escapements.

The current mark-recapture methodology to estimate Copper River king salmon escapement has a 95 percent confidence interval of plus or minus 25 percent.

This means currently that if the mark-recapture point estimate for a given is 27,000 fish (the current long-term management objective), the Department has a 95 percent confidence interval that the true escapement lies between 20,250 and 33,750 fish.

Comparing to the new SEG range of 18,500 – 33,000 fish

<u>M-R Point Estimate</u>	<u>95 percent confidence interval</u>
• 28,750	21,562 – 35,938
• 27,000	20,250 – 33,750
• 25,750	19,312 – 32,188
• 24,000	18,000 – 30,000
• 18,500	13,875 – 23,125

This means that if the point estimate for a given year is at the new lower bound SEG range of 18,500 and this becomes the new long-term management objective, there is a 50 percent chance that the true escapement will be below the minimum goal.

- 3) Nearly three life cycles of Copper River king salmon have now produced returns of less than the previous 20-year average. When this many years of lower numbers are fed into any of the Department's escapement goal development models, the predictable outcome is a lower estimate of maximum sustained yield (MSY).

At this point we would argue that the outcome to lower the minimum escapement goal is more mathematical than scientific.

- 4) MSY is not the most appropriate management objective for the important non-commercial fisheries (Subsistence, Personal Use, Sportfishing) of the Copper River Basin and attempting to maximize



yield in the commercial fishery out front jeopardizes not only the success but the sustainability of the in-river fisheries.

A management objective of Maximum Sustained Production (MSP) would be much more appropriate for the Copper River, where higher numbers of king salmon in-river lead to more productive in-river fisheries.

- 5) The management of the 2017 Copper River salmon fishery was unfortunate. The Department was placed in a difficult position by a very low pre-season king salmon forecast of 29,000 fish (that had a 95 percent confidence interval of 3,000 to 55,000 fish), which was the lowest in 20 years. While it is not necessary here in our public comment to restate the timeline and series of questionable decisions (as they are well documented), it is sufficed to say that we believe the implementation of pre-season restrictions and closures was not applied equitably to the commercial and in-river fisheries.

While KRSA highly suspects that the Department would act in a different manner given the chance, we feel it is important for the Board to assess this situation and give direction to the Department.

KRSA believes that in a situation like the Department faced in 2017, where in addition to a pre-season forecast the Department fully intends to place a heavy weighting in the management decision process on performance in the commercial fishery, it is unwise to issue Emergency Orders pre-season that close sport and personal use fisheries and restrict subsistence fisheries.

- 6) **KRSA recommends that the Board reject any proposal seeking either to liberalize regulations or to remove conservation measures that may increase the harvest potential for Copper River king salmon.**



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11/15/2017 9:09:37 PM
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To hear that there is even an option to take away the means that many people use for subsistence fishing is very appalling but also so disheartening to my whole family. See on June 16th, 2011 my family, most of all my uncle, had the worst day of his life in Chitina. My cousin had slipped into the river and was never seen again. Without boat assistance there would be no way of helping anyone that finds themselves in the same situation. Most of all this beautiful place that we go visit every year, no matter, what on June 16th is inaccessible without the means of a boat. We love to have this option to fill our subsistence tags with delicious Copper River Reds, so please don't take that away but most of all don't take the access to our favorite rock to visit my cousin every year away.



Submitted By
Larry Hinzman
Submitted On
11/17/2017 1:09:40 PM
Affiliation

~~

Dear Sir/Madam:

I am writing to express my opinion that the pike fishery within a three-mile limit of confluence of Goldstream Creek and the Chatanika River should remain restricted to help replenish the depleted pike populations in the Minto Flats area. This area has been an intensely targeted fishing area, resulting in substantial over-fishing and poor fish management. Restricting fishing in this small area will result in greater reproduction and should yield greater harvests throughout the Minto Flats area.

I hope Fish and Game will continue to protect this important fishery for sustained use by current and future generations of Alaskan fisherman.

Thank you for your consideration.

Larry Hinzman



Submitted By
leo americus
Submitted On
11/17/2017 2:24:58 PM
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Mr.

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I am writing in opposition to Proposals 29, 31,32, 33,and 34. There was a lot of unneeded hysteria around the 2017 Area E season. This was do to a forecast that was proven to be incorrect. This season shows that ADFG has the tools to monitor and control the commercial harvest based on abundance and sustainability. We do not need regulations that serve no other purpose than to destroy our commercial fishing industry. I would like to thank Mr. Huntington for his important vote at the May meeting. I would just like to remind you of his statement that the department is doing a good job and they need to continue to be given the same tools to continue to do this job.

thank you

Leo Americus



Submitted By
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11/17/2017 8:27:11 AM
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I SUPPORT #10

I OPPOSE #13- My family cannot afford a fish wheel and dipping by boat is our only option, It is difficult and dangerous to dip from shore and access is limited by upland ownership.

I OPPOSE #14

I OPPOSE #15 we respect the chinook and keep them in the water and flip the net and can dump them out without getting them tangled up.

I OPPOSE #16 Its the responsibility of the permit holder to report and there is a system in place that wild life managers can account for the fish. I think there is only 1 or two charters down there and to implement an entire new reporting system seems like a lot of work for information already submitted.

I SUPPORT #17 It would be really nice beable ot have additional sections of river to dipnet out of the canyon in slower moving water. The few drifts in the canyon can get extremely crowded as there are not that many productive places to drift in the personal use area.

I SUPPORT #18

I SUPPORT #28

I OPPOSE#36



Submitted By
Lita Lubitsh-White
Submitted On
11/15/2017 2:29:35 PM
Affiliation

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
MARK SPENCER
Submitted On
11/14/2017 9:58:02 PM
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ANCHORAGE, Alaska 99502

Proposal 10 - We **SUPPORT** this proposal for the following reasons

From Chitina Dipnet Association: "We feel that it is time for the BOF to establish an Optimum Escapement Goal (OEG) for both Copper River sockeye and a separate OEG for Copper River Chinook. An OEG would better address the needs of the inriver users and could allow the BOF to add to the SEG, additional salmon to meet those needs."

Proposal 13 – We **OPPOSE** this proposal for the following reasons:

This proposal only offers anecdotal evidence that boaters with fish finders are the sole cause of declining fish counts within the Copper River Watershed in recent years.

1. When you consider setting a fish wheel in your favorite spot or clambering down to the waters edge to dip your favorite back eddy year after year as done by Alaskans for generations. Location plays a big role in the fishermen's success. After all, the point is to catch fish and to do so in the most efficient way possible. Anyone who operates a fishwheel can attest that prime locations are often held by the same permit holders for generations. Often prime spots out fish other wheels in the same area.

High waters in recent years have changed the braids making it difficult to access wheels. Debris carried by these high waters are damaging the wheels and setting them adrift on the Copper. This has led to many fishwheel operators and would be operators to choose a boat as their preferred way to dip.

2. Unlike fishwheels, no one boat can hold a particular spot on a drift regardless of electronics and anyone who's drifting has an equal chance of catching fish as long as they have a net in the water. As time passes users find more effective ways to catch fish and this is evident in all aspects of subsistence hunting and fishing. For Alaskan's who do not have access or resources to launch and recover a fish wheel, or if he or she not feel safe standing on slippery rocks or wading in the fast moving current, dipping from a boat is a extremely safe and effective alternative.

3. As the majority of boats launch adjacent to the Copper River Bridge on the engineered riprap from the bridge abutment, the boats arguably do less damage to the riparian habit than all other forms of dipnetting on the Copper. Damage by trucks, equipment to launch and recover fishwheels, camps, abandoned wheels and foot traffic are impacting the riparian habitat more than dipnetting from a boat. The Kenai is leading the way on restoration and mitigation efforts and perhaps those lessons could be applied on the Copper as well.

SUBMITTED BY: Mark Spencer DBA, AK Expeditions, LLC

Proposal 14 – We **OPPOSE** this proposal

Proposal 15 – We **OPPOSE** this proposal for the following reasons:

1. A dipnet is by definition a net intended to catch fish. LFS Donaldson's Marine Supply, arguably one of the largest source of netting materials within Alaska, have confirmed there is not a commercially available net that would be more effective for dipnets than the multi-strand monofilament nets currently being used. While no alternative was proposed within the body of the submission any perceived alternatives would provide no appreciable benefit to fish intended to be released.

2. Of all perils faced by the Chinook after being caught in a net, nothing affects the mortality more than removing the fish from the water. The most scientifically substantiated information available on catch and release was prepared by the Alaska DF&G as well as by many other state and federal agencies supports this fact. The findings overwhelmingly attribute the higher mortality among fish is lack of oxygen from being removed from the water. These studies also suggest low morality of released Chinook when kept in the water while removing hooks or unfouling from nets.

3. It is our experience that Chinook are rarely if ever gilled in these nets due to their proportionality large heads relative opening of the mesh. With care, Chinooks can be quickly removed from the net while keeping the fish and net in the water and simply rolling the net allowing their release. We have done this hundreds of times over the years and this technique can be easily demonstrated and mimicked by novice dipnetters.

4. We can all agree that whether Chinook are in abundance or not, educating the end user on the proper handling and safe release of these fish will yield the results we all seek. Preparing and posting online educational videos like the "how-to" videos already available on the AK DF&G website, building information kiosks at key dipnet access locations that detail these techniques are all effective ways to educate the public about this critical issue. As a punitive measure, simply enforcing existing regulations that award penalties for removing

Chinook salmon from the water when retention is prohibited, also draws attention to the issue. Ultimately regardless used, if the fish are mishandled they will die regardless of their method of capture.



References

Terry Bendock & Marianna Alexandersdottir, August 1990. Mortality of Chinook Salmon (Fishery Data Series No 90-16) Retrieved from Alaska Department of Fish and Game <http://www.adfg.alaska.gov/FedAidPDFs/fds90-16.pdf>

SUBMITTED BY: Mark Spencer DBA, AK Expeditions, LLC

Proposal 16 - We OPPOSE this proposal for the following reasons:

1. This proposal imposes an extra burden on the regulatory agency to develop and manage a new reporting process, and also burdens charter operators with additional regulatory requirements when there is already an individual reporting requirement in place for the permit holder. The current dipnet reporting requirements include date(s) fished, how many and what types of fish were caught and where those fish were caught. They can be reported online via the AK DF&G 's website or by mailing in the hardcopy permit as required.
2. Unlike dipnet charters, Sportfish Charters had no regulatory requirement in place to account for sportfish caught by clients on sportfish charters. As previously stated, both the Glennallen Subdistrict Subsistence Permit and Chitina Personal Use Permits have reporting requirements with punitive measures in place should an individual fail to report as required.
3. This proposal increases the burden on AK Dept of Fish and Game staff , increases compliance and enforcement costs, and impacts the charter operators with no new appreciable data to benefit resource management beyond data that which is already being collected.

References

AK DF&G Permits/Regulations: <http://www.adfg.alaska.gov/index.cfm?adfg=PersonalUsebyAreaInteriorChitina.regs>

AK DF&G Online Harvest Reporting: <https://www.adfg.alaska.gov/sf/PU/>

SUBMITTED BY: Mark Spencer DBA, AK Expeditions, LLC

Proposal 17 - We SUPPORT this proposal for the following reasons:

1. The additional length of river would reduce congestion at the outlet of Woods Canyon where drifting from the boat can be crowded on high use days. It also puts boats out of the main currents avoiding the heaviest in river debris that often fouls jet and propeller motors. Boats that lose their propulsion in the canyon are at high risk of great bodily harm. The slower moving braided sections offer a higher degree of safety when operating on the Copper.
2. DF&G and AST should address in river enforcement and rescue logistics in that additional section of river. It's often left up to the charter services to provide first responder type services when assisting stranded boaters as AST is not often in the area with the appropriate equipment to conduct rescues.

SUBMITTED BY: Mark Spencer DBA, AK Expeditions, LLC

Proposal 18 - We SUPPORT this proposal for the following reasons

From Chitina Dipnet Association" The PU dipnet fishery opening and closing are based solely off of the sonar count passage numbers. When commercial fishermen are restricted because of low run numbers, those low numbers will show as low sonar counts, triggering closures in the dipnet fishery. To require that the PU dipnet fishery salmon allocation drop from 150,000 to 50,000 just because the commercial fleet has been restricted for 13 consecutive days, while the PU fishery would bear the same restrictions, is unjustifiable. This allocation reduction would be for the remaning dipnet season even though run numbers may rebound soon after. It is time to remove this regulation from the books."

Proposal 28 - We SUPPORT this proposal for the following reasons

From Chitina Dipnet Association: "The inside mandatory closures were instituted as a chinook salmon conservation measure. Chinook tend to mill in the shallower waters at the mouth of the Copper River and are very vulnerable, especially at low tide, to drift gill nets."

Proposal 36 - We OPPOSE this proposal for the following reasons

From Chitina Dipnet Association: "This proposal would prohibit the Dept. F&G from managing the commercial fishery if low run numbers indicated closures were warranted. It would also eliminate the mandatory inside water closures which were put in place as a chinook conservation measure"



Submitted By
Martin Budnick
Submitted On
11/14/2017 9:58:44 AM
Affiliation
PWS Gillnetter 35 YRS

To all board members thank you for taking the time to read these comments and deal with these proposals. My name is Martin Budnick and I am a third generation commercial fisherman. I have been fishing in Alaska since 1978 and have fished PWS and the Copper River since 1983 35 yrs now. Here are my comments on the proposals that concern me directly and the other fisherman in our area.

Proposal 10 AGAINST This one is just another proposal to exploit the kings by the upriver user groups. Our escapement levels for sockeye have always been met and our king escapement have mostly been met but the king escapement is just an estimate and the means for getting king numbers is poor at best under ADFG means for obtaining these numbers.

Proposal 12 FOR This one makes common sense for ALL that are involved in harvesting Kings and Sockeye any help at all is better than none.

Proposal 15 FOR The use of monofilament material is outlawed to the commercial fishing fleet as the same reason it should be prohibited for sport and personal harvest. Harvesting from boats is also a new directed fishery that was non traditional. They have created a new user group that increases the harvest of our Kings and Sockeye.

Proposal 16 FOR If you are going to allow these Charter and Guide fisherman to continue operating like this then they need to log thier information down so ADFG has some kind of accurate information to have to monitor this fishery.

Proposal 17 AGAINST This proposal will add more pressure on a over used fishery that is more than ever being exploited by charter and guide businesses and increase the proplems that we already have upriver with no limits.

Proposal 18 AGAINST Having the commercial salmon fishery closed for more than 13 consecutive days there is a problem and it should be a great concern for all. Than there is a problem that we all need to share in the burden that we get enough escapement return for the future. allowing one user group to harvest and another not does not make sense if you don,t have the proper numbers we need for our future.

Proposal 20 FOR I have no problem with subsistance fishers being able to access safer waters. Time for fishing should still be designated by fish ADFG also a more timely report back to ADFG on harvest numbers should be implemented like within 24 hrs of ending fishing time.

Proposal 23 FOR As being a hunter gatherer also I have seen the effects of catch and release on fish and I see nothing good come from it.

Proposal 24 FOR

Proposal 27 Against

Proposal 28 FOR ADFG still has the authority to close these waters if needed.



Submitted By
Martin Budnick
Submitted On
11/14/2017 11:07:12 AM
Affiliation

Proposal 29 Against We have already been restricted to fish in these waters when ADFG deems to necessary. We don,t need to restrict ADFG from being able to use or not these waters that we have fished forever. Another poor effort by the upriver dipnetters to further try and destroy our fishing capabilities.

Proposal 30 Against

Proposal 3132 33 34 Against Another poor attempt by the dipnetters and sport fishers to try and destroy the commercial fishing fleets ability to harvest its resource in a productive way. Also these proposals were written before the commercial gillnet season was even started due to the fact that ADFG had pre managed the season before it even started. The gillnet fleet was reduced in time and area before we set a net. This was poor management by ADFG and was severely told by me and others at meetings prior to the season that this was just plain wrong. In doing so by ADFG the upriver fleet went into a frenzy and these proposala that have been written were a result of this.I can,t blame them but lets not jump on the band wagon and try to address something that isn,t broken. Untill we have better management tools to gather information on our KING stocks in river escapement and harvest numbers by ALL user groups dipnetters personnal use fish wheels and such lets not blame one user group for the lack of information we don,t have. The gillnet fleet is the only true user group that provides any real data to the department for numbers of Kings returning to to Copper River and this is being altered by less time and area previously fished in the past to get true numbers that correspond with past harvest records. Upriver data used by the department is also being collected with less effort and area access not being used to determine escapement data.

Submitted By
Martin Budnick
Submitted On
11/14/2017 11:19:09 AM
Affiliation

Proposal 35 Against Lets keep the opening on or at the closest day to May 15 and not pre manage our sesons on speculation of weather or river conditions. You don,t know whats going on until the gillnet fleet goes fishing to give the department any real time data.

Proposal 36 For I have always believed that that the gillnet fleet could fish two twleve hour periods a week and not be a detrement to the resource. Weather being a major factor in the gillnet fleet to harvest fish has always been one of the most or biggest obstacle for the gillnet fleet to be able to fish in a safe and productive manner. When it blows hard almost nobody fishes under these conditions.

Proposal 37 FOR



October 1, 2017 Comments Regarding the Agenda Change Request ACR01 to Leave the Existing Regulations as Published:

I submit these comments as the sponsor of the original proposal #143 to restrict subsistence fishing through the ice for three miles upstream from the mouth of Goldstream on the Chatanika River, AND as a fisherman with sixty years of experience fishing in Minto Flats.

The approval of this original proposal wasn't an error in regulation. It was an effort to correct an overfished and high graded area that once had an outstanding high population of large pike, including many fish 30" to 45", the pre-spawning females. *The Pike Slough*, by Nick Jans, might be of interest (attached).

Fish and Game studies with radio tagged pike in Minto Lakes have shown that 50% of the migrating pike stay in the Chatanika River within two and three miles upstream from the confluence with Goldstream Creek, and the other 50% continue upstream from mile 3 to mile 10 (copy of study enclosed). **Hardly any fish remain in the first mile as shown on the study.**

So, the subsistence fish are there and a reasonable opportunity exists for their catch. They are just spread out over seven miles instead of being as consolidated as the fishermen are used to. These fishermen will have to put forth an effort to locate the hot spots and new holes.

Perhaps the small catch this past winter is an indication of a sharply reduced available population caused by overfishing, or a die-off in the lakes, or thick ice restricting migration, or last summer's high water level negating the need for migration, or a combination of these. The three mile limit has only been in existence for one season – hardly enough time to make any conclusions or cause an increase in available fish.

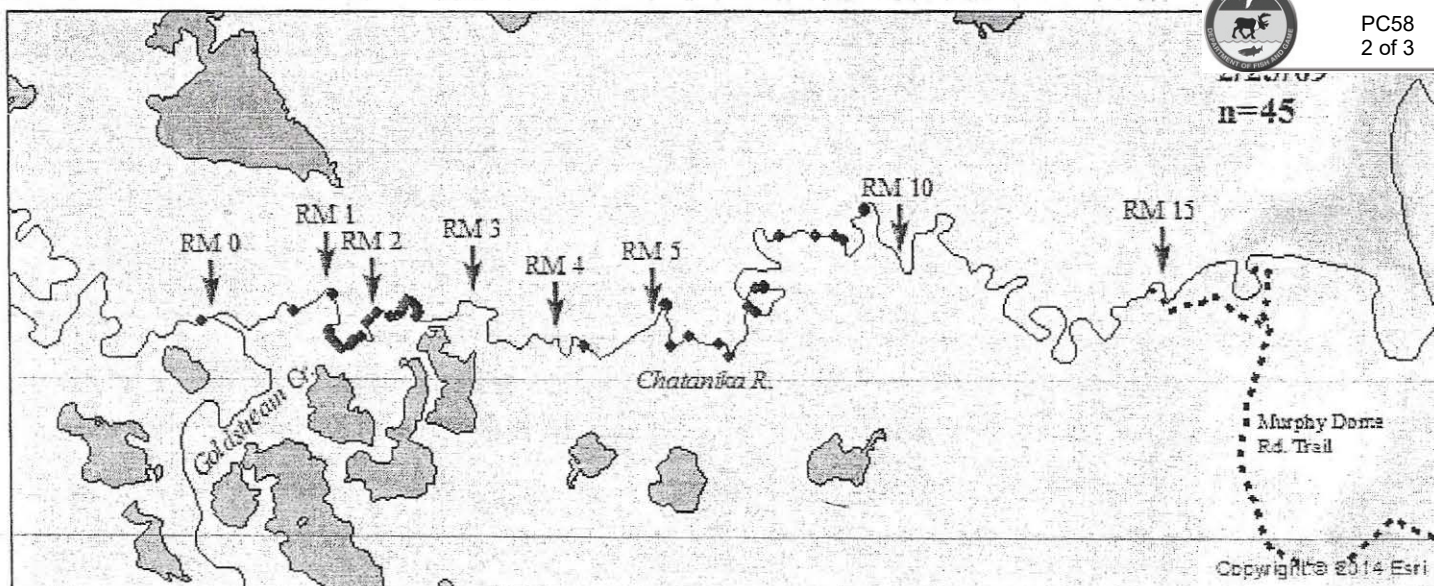
This ACR was crafted and presented at the April 5, 2017 Fairbanks Fish & Game Advisory Committee meeting by an ice fishing member of the Board. Only two members of the public attended and spoke in support of this ACR.

This three mile restriction needs to remain in effect long enough to allow these slow growing pike to rebound in number and size. Cutting it back to one mile is sure to cause an additional decline in what is already a fishery that has reached a level of concern.

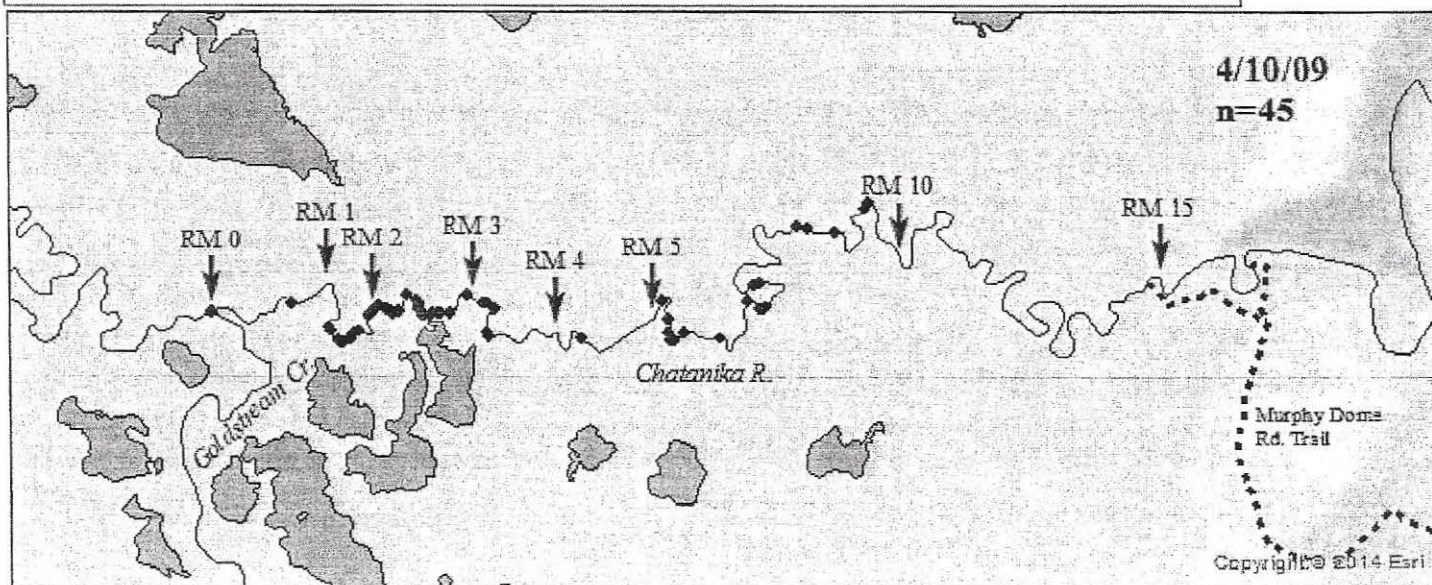
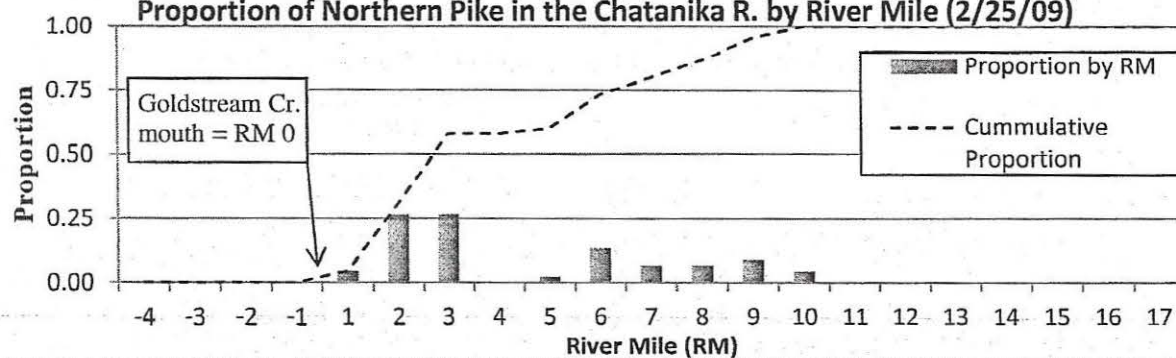
Marv Hassebroek



2/25/09
n=45

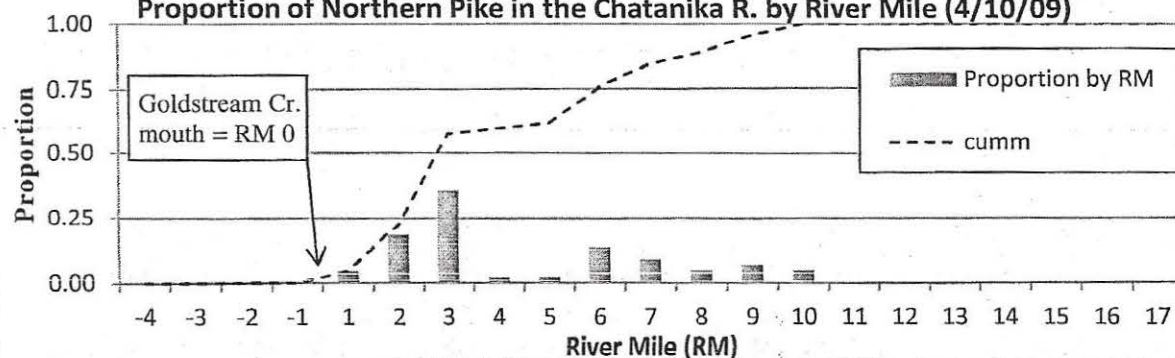


Proportion of Northern Pike in the Chatanika R. by River Mile (2/25/09)



4/10/09
n=45

Proportion of Northern Pike in the Chatanika R. by River Mile (4/10/09)





The Pike Slough

Catch and release before they're deceased

BY NICK JANS

THE SLOUGH DIDN'T LOOK LIKE much—a dead-end, tannin-stained channel less than a cast across and maybe 150 yards long. I'd paused at its mouth to pick up a gas can I'd cached for my return trip down the Nuna. But as I stepped onto the bank, a rippling vee shot out from the reedy shallows. I rigged up my rod with a steel leader and weedless spoon and lobbed out a cast. Instantly, a half-dozen shark-like wakes converged on my lure. Raising a boil the size of a washtub, a giant pike slammed my lure, streaked into a clump of brush, and snapped my 15-pound test like thread.

A trophy pike taken from "Pike Slough."

My hands shook; I tied on another spoon. Another set of wakes, and another jarring strike. This time, I managed to horse the fish into open water. After a splashy fight, I boated a toothy twelve pounder—smaller, but still a serious chunk. Two heart-pounding hours later, I headed homeward, with a half-dozen pike aboard, all between 10 and 15 pounds. I'd released a dozen more, and lost at least that many. I gave away fish to appreciative friends back in the village, and kept two. We feasted that late summer on filets of golden-fried pike. I was pretty damn thrilled. While pike were common enough on the upper Kobuk, most ran half that size. I'd struck an apparently inexhaustible lode of behemoth fish.

The next time, I brought along my buddies Lynn and Steve, and the

(over)



Submitted By
Mel Hawi
Submitted On
11/16/2017 9:30:37 AM
Affiliation

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Prop #10-SUPPORT
Prop #13-OPPOSE
Prop #14-OPPOSE
Prop #15-OPPOSE
Prop #16-OPPOSE
Prop #17-SUPPORT
Prop #18-SUPPORT
Prop #23-OPPOSE
Prop #28-SUPPORT
Prop #36-OPPOSE



November 11, 2017

Chairman John Jensen
Alaska Board of Fisheries
Boards Support Section
PO Bo 115526
Juneau, AK 99811

RE: comments on 2017 PWS Finfish proposals 40, 41, 42, 43, 44, 45

Dear Chairman Jensen and Members of the Board,

My name is Michael Brown and I currently live in Sheridan Wyoming. I have setnet in the Eshamy district as a deckhand from 1984 to 1990 and as a limited entry card holder since 1991. During the 34 years I have fished, I've been involved in the BOF process. I am currently the treasurer for the Prince William Sound Setnetter's Association. The comments I've made are my own and do not necessarily reflect the opinion of all members of PWSSA.

I would like to thank the Board for the opportunity to comment on the proposals to be considered this year.

PROPOSAL 40: Establish minimum operation depth for drift gillnet gear fished within 90 fathoms of a set gillnet in the Crafton Island Subdistrict – SUPPORT.

I submitted this proposal after years of frustration from drifters setting as near as possible to my setnet. They would sit with their net caught on the bottom on the inshore end and use the power of the boat to pull the offshore end out to keep it 60 fathoms from my net. That is as long as I was there. Often returning to my net, I would find them too close. Then they would start their boat and pull it away while I was there. They're setting a drift net in front of my setnet net appears to be **in violation of the law**.

The General Provisions say concerning drift gillnets:

5 AAC 39.105. TYPES OF LEGAL GEAR. (a) All gear shall be operated in a manner conforming to its basic design.
(d)(3) a drift gillnet is a drifting gillnet that has not been intentionally staked, anchored, or otherwise fixed;

While the Prince William Sound regulations state:

5 AAC 24.331. GILLNET SPECIFICATIONS AND OPERATIONS.
(c) Notwithstanding 5 AAC 39.105(d)(3), for the purpose of this section, a gillnet shall be considered to be a drift gillnet unless the gillnet has been set, staked, anchored or otherwise fixed.

Notice the lack of "not been intentionally..." in the PWS Area regulation. This was purposely removed in a recent BOF. Proposal 40 is needed to create an offset to keep the **set** drift gillnets from drifting into legally fished setnets.

The rest of my comments can be found in the proposal.



PROPOSAL 41: Prohibit operation of commercial salmon drift gillnet gear within 60 fathoms of the shoreward of a set gillnet in the Crafton Island Subdistrict - OPPOSE.

I've quoted above from the boards TENTATIVE COMMITTEE ROADMAP. **This is incorrect.** It states that a driftnet could not be operated within 60 fathoms of the shoreward of a set gillnet. The actual proposal states: "In the Crafton Island Subdistrict, no part of a drift gillnet may be operated within 60 fathoms of a set gillnet, except in the zone outside of the offshore end **Or shore end**". If passed this proposal would allow drifters to be right next to a setnet's inshore end, not offset 60 fathoms. There is enough gear conflict between setnetters and drifters. Having a drifter trying to deploy 150 fathoms of net between a setnet and shore would only escalate conflict. The author states "In the Eshamy District there are many set gillnets affixed to pinnacles". Except for one rock on the south line, there are no setnets on pinnacles that would afford a deployment of more than 20 fathoms of net. This issue is a non-issue and is not worth the increased conflict and enforcement difficulties it would cause.

PROPOSAL 42: Repeal maximum length for set gillnet gear in the Main Bay Salmon Hatchery Harvest Management Plan and prohibit operation of a drift gillnet within 20 fathoms of a set gillnet - OPPOSE.

Currently setnets at the head of Main Bay are required to be 50 fathoms apart. Drifters cannot get within 25 fathoms of a setnet. The 25 fathom distances requirement should prohibit drifters from going between two setnet that are at the legal distance of 50 fathoms apart. The purpose of this proposal is to give space for drifters to legally get between two setnets. If passed this proposal would cause an enforcement nightmare. A driftnet set in this narrow band between setnets would surely drift too close to the setnets nearby. Why introduce this potential source of conflict into an already volatile situation. To alleviate conflict it would be better to increase the distance to 30 fathoms to prevent drifters from claiming they can set a perfectly straight net between two setnets which causes conflicts when the net drifts an inch and becomes closer than 25 fathoms.

This proposal states the issue is the "(l)ack of access to traditional beach drifts for the gillnet fleet inside Main Bay". This makes it sound like the drifters had been traditionally fishing this area, and setnetters showed up and took over their area. **This is not reality.** The first return of fish to Main Bay was 1983. After the 1984 season, the BOF meeting changed the distances between setnets from 100 fathoms to 50 fathoms in the THA. There were few drifters fishing in that area so there was little or no opposition to the change. The map of Main Bay's recorded plat through the State Division of Lands Shore Fishery Lease Program (which follows the comment on proposal 42) shows that since 1985 there have been setnets 50 fathoms apart in the THA. If drifters are going to claim to have traditionally fished areas on the beaches of the THA, they need to show proof. Proposal 42 says the issue that they would like the Board to consider is lack of access to a traditional fishery. **There is no traditional fishery.** Therefore, there is no lost access and no issue for the board to address. This proposal is nothing more than an attempt to allow drift nets between setnets that have been fished in that area since 1985 and should be rejected.





PROPOSAL 43: Clarify provisions for operation of drift gillnet and set gillnet gear in the Main Bay Subdistrict - OPPOSE.

Combined proposals 42, 43 and 44 would have a drastic negative effect on the owners of setnet permits. Here is what our fishery would become:

Since the setnet permit holder has to be on the boat to have gear operated (proposal 44), only a single net at a time could be set. As the first net was set, drifters would lay their nets right next to or over the top of other running lines. The drifter would then be allowed to sit there an indefinite amount of time while they retrieve their gear or navigate to legal water. Meanwhile, it would be illegal for a setnetter to set another net. (proposal 44). According to proposal 43, the inability to deploy setnet gear is what the Board of Fish intends. Quoted from proposal 43:

“The Board of Fisheries intentions to maintain access for the drift fleet has slowly been eroded as **enforcement does not focus efforts to keep set net crews from operating and deploying gear during openers**. A drift operation needs to be able to retrieve its gear if it is deployed before a set net is deployed.”

What regulation has the Board ever passed that would allow enforcement to focus on keeping setnetters from deploying gear during an opener? How can “access for the drift fleet” be “slowly eroded” when setnetter were already fishing before drifters in the area drifters are now claiming as their own? Why exactly does a drift operation needs to be able to (have as much time as they'd like to) retrieve its gear if it is deployed before a set net is deployed. Drifters may want it that way, but the law clearly states they need to be a set distance from setnet gear. We're set, but they're mobile and can move. The issue for the Board to address in proposal 43 is:

“This has kept the drift fleet from **historic** and allocated access to these buildups”

Where in the Main Bay Plan is there an “allocated access to buildups” guaranteed to drifters? Again the lost of their right to fish historic areas is given as the reason to approve the proposal. This is a repeated theme:

Proposal 42: Lack of access to **traditional** beach drifts for the gillnet fleet inside Main Bay

Proposal 45: (Keep) the drift fleet from **historic** beach area.

There may be a “tradition” of the last 10 or 15 years of drifters on the beaches in Main Bay, but the fish started returning to Main Bay in 1983, that is 30+ years ago. When pinks were coming back in the 80's and dogs in the 90's, there were the same amount of setnetters as now fishing Eshamy and few drifters. Even during the early years of the reds returning, there was not the number of drifters that are in Main Bay now. If anyone can claim history, it is the setnetters. The purpose of proposals 42-44 is not to restore a “historical” drift fishery, but to destroy the setnet fishery that has been in Main Bay since the first return of fish in 1983. The issues drifters are claiming the Board needs to rectify are nonexistent and fabricated. Proposal 43 should be rejected.

PROPOSAL 44: Specify that operation of each set gillnet or drift gillnet must be performed or assisted by a Commercial Fisheries Entry Commission permit holder in the Prince William Sound Area commercial salmon fishery - OPPOSE.

The Alaska Statutes make it clear that is not necessary for the permit holder to be at each stationary net that is being operated. It also appears to require the Board to allow setnetter permit holders to be at another net while someone is operating a different net of the permit holder. The following is the statute:

SEC. 16.05.253. OPERATION OF STATIONARY FISHING GEAR. (a) The Board of Fisheries may require a person who holds a limited entry permit or an interim-use permit under AS 16.43 to be **physically present** at a



beach or riparian fishing site **during the operation** of net gear or other stationary fishing gear at the site, **except when the permit holder is at** or traveling to or from the location of

- (1) a sale of fish caught in the gear; or
- (2) **other stationary gear** of the permit holder.

It is clearly stated that stationary gear permit holders must be physically present during the operation of stationary gear **except when** the permit holder is at other stationary gear of the permit holder. The wording assumes someone is operating the stationary gear, which would include setting the net, fishing the net and pulling the net, while the permit holder is not present. It also clearly states that the board can require a permit holder to be physically present during operation of stationary gear **except when** selling fish or at another net.

Notice the similarity but lack of exception in the language regarding mobile net gear operators (drifters):

5 AAC 39.107. OPERATION OF GEAR. (a) Each fisherman shall operate or assist in operating only one type of net gear at any one time.

(b) **Throughout the period of operation** of mobile net gear, a person who holds a valid CFEC permit for that gear **must be physically present** on board the vessel from which the net gear is operated.

(c) **A CFEC permit holder shall personally operate or assist in the operation of mobile net gear.** Personally operate or assist in operation means assisting or supervising some portion of the immediate operation.

If the state had wanted setnetters to be immediately, physically present on the skiff “throughout the period of operation” to personally operate or assist, they would not have included the “**except when**” and would not have left out “throughout the period of operation”. As in the case of mobile net gear, the State could have clearly stated the need for setnet permit holder to be physically present on board the vessel to “personally operate or assist”, but they didn’t. There is nothing in the language of 5 AAC 24.331 (b)(3) that shows intent of the regulation to supersede the Alaska Statue. It’s clear that the statement, “shall be performed or assisted” is defined by and subordinate to the language of the Alaska Statue which does not require the setnetter permit holder to be physically present during the operation of stationary gear.

Approval of this proposal would be contrary to other state statutes and would go against how the State has traditionally allowed setnetters to fish. Therefore it should be rejected.

PROPOSAL 45: Limit each Commercial Fisheries Entry Commission permit holder to no more than four set gillnet sites deployed with lines and buoys in the Prince William Sound Area commercial set gillnet fishery – **OPPOSE**.

Ideally, I would only fish my three nets located outside of Main Bay. But there are times when it is necessary for Fish and Game to close the outside and have only Main Bay open. When this happens I fish nets inside Main Bay. The announcement of only fishing in Main Bay can happen the afternoon before the 8:00 a.m. opener the next day. This does not leave time, especially in bad weather, to put running lines in Main Bay before the opener. This is why I need to have running lines in Main Bay that are not fished if the whole district is open.

On the outside of Main Bay, I also have more than just three running lines. I would like to just fish my regular three nets, but once sufficient fish show-up, two of those nets are surrounded on both sides by drifters setting their “drift” net on the shore. This forces me to move two nets close to the third net to keep all three nets from being cut-off. If drifters would like to have less setnet gear in the water, they could stay off the beaches.



Lastly, it was suggested the unused running lines could be sunk. In the past I have done that. With the increase in the number of running lines being cut by drifters, I really don't want to only have one access to all the gear that it takes to place a running line. I realize, since it has happened, someone could cut everything, and I would lose the whole setup. But the times I have had running lines cut, it was just the running lines so it was possible to retrieve the anchors from the buoys.

Expect for last year, a proposal to limit the quantity of setnet sites has yearly been rejected. Once again for the reasons of various areas being open, need to fish different locations depending on circumstance and the labor involved to set a running line, often with little notice, this proposal should be rejected as the other were.

I thank you for your consideration of the points I've raised in these comments. I trust they will provide you with sufficient information to aid in your final determinations during this fishery review.

Sincerely,

Michael E Brown

Supporting Documents:

Main Bay's recorded plat through the State Division of Lands Shore Fishery Lease Program



PWS Finfish

Michael Spaetgens

56760 E. End RD Homer, Alaska 99603

fingerpt@aol.com 907-201-1677



PWS set net permit owner for 18 years, crewmember for 6 years. Commercial fishing in Alaska since 1978.

Michael Spaetgens



Opposition to Proposal 41

- What qualifies as a pinnacle? Many of these pinnacles are points running from the beach at low tide. It is unenforceable depending on tide fluctuation.
- Risk of losing beach build ups with drifter running from shore tie to the beach. Drifters have the ability to maneuver their gear and round haul on the beach inside of our sets.
- How will the distance between gear be determined when there is a drift net inside of our shore tie? How will troopers be able to enforce this?
- It grants drift access to historic setnet beach area.

Opposition to Proposal 42

- Allocative- Increases fishing area exclusively accessible to the drift fleet.
- Increases Level of Conflict- Provides a drift access area between every setnet site
- Unenforceable by establishing an exclusive drift only zone between all setnet sites 50f apart in Main Bay. How can a 32 foot drift boat exclusively maneuver in a 10f zone between our sets.
- Reducing the distance between set and drift gear in Main Bay is inconsistent, as in 1996 ADFG Protection proposed to increase the distance between drift and set gear outside Main Bay to reduce conflict and increase safety.
 - **Counter with a request to increase the distance between set and drift gear inside the THA to 30 fathoms to reduce the conflict during Main Bay build ups.
- All existing lease sites in Main Bay would be delegitimized. Our lease sites would no longer provide us priority access to waters extending from a 50 fathom section of shoreline.
- Drift operations have exclusive access to offshore fishing area in Main Bay. Often, Main Bay build ups are concentrated in offshore areas. We are limited to beach access only. This proposal would remove all protection to our shore sites.
- Drift operations have the ability to maneuver 150 fathoms of gear side by side with our stationary 50 fathoms of gear.

Opposition to Proposal 43

- Request for additional leniency for drift fleet is unnecessary. Once a setnet is deployed, drifters generally know they must pick up and move to legal waters.
- Unenforceable- This proposal would put enforcement in the hands of the fishermen. It is not our responsibility to determine how much time a drifter should be given to remove their gear from illegal waters once a setnet is deployed.
- Gear conflict- The way this proposal is worded, it would allow both drift and set gear to concurrently fish the same site.
- Falsely portrays crew members setting gear illegally, which is not the case. Under current law, it is legal for setnet crew members to set and operate gear. Reference 5AAC 39.107d
- The author mentions that a drift operation must be able to retrieve their gear once a setnet is deployed, making them illegal. We do not prevent them from retrieving their gear. It is their responsibility to move to legal waters.
- Main Bay build up openers- If this proposal were to be accepted by the board, it would allow drifters to sit between our sets harvesting our fish until they decided they had the sufficient amount of time to move.

Opposition to Proposal 44

- Proposal is invalid as written. Current regulation is enforced as intended (5 AAC 24.331 (b) (3)). Defined in 5 AAC 39.107 (d).
- These laws are consistent across the state of Alaska.
- Setnet crew members are allowed to operate and set gear under the current law.



- Safety Issue- Setting gear and operating out of a skiff with 150 fathoms of gear. Timing, bad weather, etc.
- After setting our first 50 fathom net, drift gear would already be set on our 2nd and 3rd sites. As a result, this would increase gear conflict.

Opposition to Proposal 45

- The number of setnet permits and gear has not changed. There has been a perception of increased unused setnet gear that is actually a result of the recent management that has held us in Main Bay more often.
- Safety- Forces us to raise and lower sets regardless of the weather conditions.
- Gear conflict- Puts us in the position of law enforcement to direct drift operators to relocate so we can put our gear in the water.
- This proposal has been submitted in similar form in 3 previous board meetings. The board has shot it down repeatedly due to safety and gear conflict concerns.
- No limit on number of sets in any other setnet district in the state.

Opposition to Proposal 48

- This fishery has been intercepting fully allocated Main Bay sockeye as well Wild Coghill Sockeye. We propose returning this fishery to a cost recovery fishery until July 18th.

Support for Proposal 49

- We support Option 1: Eliminate common property seine fishery at AFK prior to July 18th and have the fishery return to a cost recovery fishery like it was prior to 2004.



Submitted By
Michelle Myers
Submitted On
10/26/2017 8:15:41 AM
Affiliation

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Board of Fisheries. By Catch, fish caught dead or dying, dumped back in ocean. By Catch fishing is very bad for the environment. Any thing caught should be processed. At a reduced payment with any difference to market value, taxed and used as Grants to improve selective fishing techniques.

Allocation of fish. You start at the minimum needed for the smallest group. Out of state sport fishing licenses. Minimum 2 of each. Next is subsistence. Then households. Last commercial fisherman.

After working up the list with minimums you head back down the list filling in with the projected extras.



Submitted By
Michelle Williams
Submitted On
11/16/2017 9:04:40 AM
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Proposal #40 APPROVE

Proposal #41 OPPOSE

What qualifies as a pinnacle?? Many pinnacles are points running from the beach at low tide. This proposal would be unenforceable depending on the tide. How is the distance between gear to be determined if a drift net is inside of a set net shore tie? How will the troopers be able to enforce this?? This proposal is asking for more conflict between the set and drift gear groups.

Proposal #42 OPPOSE

In the Main Bay Salmon Hatchery Plan 5AAC24.367(c)(1) it already states that a set net cannot exceed 50 fathoms in length in the Main Bay Terminal Harvesst Area. This regulation has been in the books for at least the last 20 years if not longer.

Reducing the operation of a drift gillnet from 25 fathoms to 20 fathoms from a set gill net except off the off shore end end of a set net site would be providing a drifter access area between every set net site, would let a drifter completely enclose a set net with their 150 fathoms of net, and would increase the level of conflict that already exists between set and drift not decrease it. This would also remove all protection to the set netters shore sites and would delegitimize all exising lease sites in Main Bay.

For everyone's safety, I would like to see the Board of Fisheries consider increasing the distance between set and drift to 30 fathoms especially in the Terminal and Special Harvest Areas of Main Bay.

Proposal #43 OPPOSE

If this proposal passed it would allow the drift fleet to sit at a set net site, and only move when they decide they are ready. This would cause the conflict between the drift and set net to increase even more than it already is. The drifters know when a set netter shows up at a site to deploy their net that it is time to pick up and move their nets to legal waters. We do not prevent a drifter from retrieving their gear, their gear is their responsibility.

This proposal also falsely protrays set net crews as setting gear illegally which under Statutes 5AAC39.107(d), 5AAC24.331(b)(3), and 5AAC39.110(c)(e) is not the case.

Proposal #44 OPPOSE

This proposal is not valid as written as set net crews are allowed to operate and set gear. Current regulation is enforced as intended under 5AAC24.331(b)(3) and defined in 5AAC39.107(d) and 5AAC39.110(c)(e).

Proposal #45 OPPOSE

Due to management changes by the Alaska Department of Fish and Game that have taken place to the Eshamy District over the last fewyears, the set net group has no idea if they will be fishing just the Main Bay Subdistrict or all of the Eshamy, Crafton Island Subdistrict. from one opener to the next. Having additional gear out in the different areas does not force us to pull or set anchors and lines for sites in bad weather. The additional gear of a set net not being fished has never stopped a drifter from fishing next to it.

This proposal has been submitted to the Board in 3 previous board meetings. The board has rejected it repeatedly due to safety and gear conflict concerns.



The department will be asking the board to adopt an SEG range of 18,500-33,000 kings.

While perhaps making mathematical sense, adopting such a low SEG will have restating consequences to upriver harvest opportunity and the commercial fishery will effectively be managed to produce 18,500 spawners and not a single fish more. The management goal has long been 27,000 kings and the conservation burden has been somewhat shared over the past decade. These numbers are based on historically low returns over the past 15 years and the escapement models contain a 25% margin of error.

Until Kings actually show a sustained rebound and we understand ocean survival better, we should reduce the defacto management goal simply because a model shows us we can.

There are many proposals that would increase the opportunity to harvest Kings in various fisheries. I do not support any measure that would increase opportunity to harvest Kings.

Proposal 228 seeks to correct an unforeseen consequence when the Board arbitrarily moved the subsistence boundary 3 miles above Goldstream creek, by amending a proposal to move the boundary up to the 1 mile mark. The department seems to have been advocating for the amendment, and continues to support it even though subsistence needs clearly were not met under the new regulation.

I participate in this fishery and it is an important subsistence resource for my family. Last year, fish in catchable numbers were simply not available in the waters open for fishing and average success was less than a fish per subsistence user. The law requires the board to provide a reasonable opportunity and the current regulation does not so. The summer sport fishery is not an acceptable replacement for the substance opportunity that was inadvertently lost when the board moved the boundary up to the 3 mile mark.

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Michael C. Kramer
216 Sacia Ave
Fairbanks AK



Submitted By
Mike Mahoney
Submitted On
11/17/2017 4:02:24 PM
Affiliation

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Dear Chairman Jensen and AK Board of Fisheries Members,

Thank you for your contribution to the sustainable and equitable management of Alaska's fisheries resources. I have been an Alaska Resident for 21 years. I have lived in Cordova for 19 years and owned an area E commercial drift gillnet boat and permit for 17 years. I am grateful to earn my living as a participant in this well managed fishery and to contribute to the socio-economic resilience of my region and the state of Alaska.

The health and stability of our fisheries and the communities they support depend on well informed, science based management by ADF&G, which is rooted in decades of consistent in-season management tools and assesment strategies. As you deliberate on the proposals before you concerning the Copper River management plan in particular, I ask you to please allow ADF&G to utelize the tools they have historically relied upon for assessing and managing the Copper River fishery. The cornerstone of our well managed fishery is consistent, data driven, in-season management. Please do not allow that to shift toward arbitrary, pre season, prediction based management. Those predictions are historically unreliable and were never intended to be a management tool. Any further arbitrary reduction in area, time, and gear would continue to hinder ADF&G's ability to assess run strength, while simultaneously putting a severe, yet unnecesary burden on our commercial fishing fleet and the communities and economies we support. My comments on specific proposals are below.

Proposal 12. Support. This is a reasonable way to ensure responsible conservation practices.

Proposal 16. Support. Good information is critical to good management. This seems like a reasonable way to gather more info on the actual commercial exploitation of the resource.

Proposals 19&20 Support. I agree that many local residents have a difficult time accessing the subsistence fishery and it could be managed separately from the com fishery without hurting the resource.

Proposal 23. Support. There is increasing evidence that catch and release of salmon, especially chinook, has a significant impact on their ability to successfully spawn. This would mostly impact non-resident sport fishermen, while it would positively impact Alaskan subsistence, personal use and comercial user groups who have a long term interest in the health of these stocks. Given what is being learned about the impacts of catch and relase of large salmon, it would seem like a reasonable change to make.

Proposal 28. Support. This mandatory closure is not necessary since ADG&G has the authority to close those waters at any time they deem necessary. The commercial fleet should be allowed our historical fishing area when the abundance of the resource calls for it. By not allowing the fleet to fish for even a short 12 hour opener, twice a week, ADF&G is left with less reliable data on actual abundance based on historical management strategies.

Proposal 29. Oppose. This is an extremely arbitrary and aggressive proposal which would have many negative consequences for the commercial fleet, while severely hindering ADF&G's ability to assess and manage the king and sockeye runs. Moving us off-shore would eliminate our ability to catch both sockeye and king salmon in the amounts needed to sustain our fishery and prevent over-escapement. Forcing people to fish in outside waters rather than in the traditional areas inside the barrier islands prevents us from beig effective as fishermen, and it will result in more fatalities in our already dangerous fishery.

Proposal 31. Oppose. Another Arbitrary and aggressive proposal that limits our traditional gear and impedes ADF&G's ability to manage using historical data.

Proposal 32. Oppose. A pre-season forecast is about as good as a coin flip for determining actual run strength and these forecasts were never intended to be used as a management tool.

Proposal 33. Oppose. This would result in a waste of an important resource and result in loss of revenue while having no effect on the sustainable management of the resource.

Proposal 34. Oppose. Depending on conditions, it can take well over a week for a salmon to reach the sonar, yet t
our traditional fishing boundaries in one or two tides. Using lower-river sonar stations in recent years, and test fish
has been verified.



Proposal 36. Support. This will provide ADF&G with an accurate in season assessment based on historic management practices while allowing ample opportunity for escapement.

Proposal 37. Support.

Proposal 40,41,42. Oppose. The set Gillnet fleet has consistently been taking more than their share of the allocated resource, yet some continue to seek ways to make it more difficult for drift gillnetters to operate.

Proposals 43,44,45. Support. These are all reasonable proposals that will ensure fairness and prevent certain set-netters from trying to block drift gillnetters from historically legal sites.

Proposal 46. Support. This recent boundary change seems arbitrary and has placed an unfair burden on the traditional user of this site.

Proposal 47. Support. I cannot see a reason not to support this proposal since it would accurately account for all of the publicly funded enhanced salmon in the allocation plan.

Proposal 48. Oppose.

Proposal 49. Support. This is a fair and reasonable way to allow for chum harvest and help management reduce the interception of the fully utilized wild and enhanced sockeye runs.

Thank you for your service and for allowing me this format to voice my opinions and concerns. Sincerely, Mike Mahoney



IN REPLY REFER TO:
OSM 17102.GP

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

NOV 11 2017

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

Dear Chairman Jensen:

The Alaska Board of Fisheries (Board) will consider 51 proposals at its Prince William Sound / Upper Copper River and Upper Susitna Rivers Finfish meeting in Anchorage December 1 – 5, 2017. We have reviewed the proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on two proposals that have potential impacts on Federally qualified subsistence users and fisheries resources in this area.

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. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola, Jr.
Assistant Regional Director

Enclosure



Chairman Jensen

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cc: Anthony Christianson, Chair, Federal Subsistence Board
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management
Jennifer Hardin, Policy Coordinator, Office of Subsistence Management
George Pappas, State Liaison, Office of Subsistence Management
Stewart Cogswell, Fisheries Division Supervisor, Office of Subsistence Management
Sam Cotten, Commissioner, Alaska Department of Fish and Game
Glenn Haight, Executive Director, Alaska Department of Fish and Game
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Lisa Olson, Division Operations Manager, Alaska Department of Fish and Game
Hazel Nelson, Subsistence Division Director, Alaska Department of Fish and Game
Scott Kelley, Commercial Fisheries Division Director, Alaska Department of Fish and Game
Thomas Brookover, Sport Fish Division Director, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
FOR THE
PRINCE WILLIAM SOUND MANAGEMENT AREA
FINFISH AND GROUND FISH**

**State of Alaska
Board of Fisheries Meeting
Valdez, Alaska**

December 1-5, 2018



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Proposal 10 requests the establishment of an Optimum Escapement Goal (OEG) of 700,000 – 1,200,000 Sockeye Salmon for the Copper River.

Current State Regulation:

5 AAC 24.360. Copper River District Salmon Management Plan

(a) The department shall manage the Copper River District commercial salmon fishery to achieve a sustainable escapement goal of 360,000 - 750,000 sockeye salmon into the Copper River.

Current Federal Regulation:

Current Federal subsistence regulations do not contain a prescribed management plan, escapement goals, or allocative tools for the Copper River salmon returns.

50 CFR §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.

50 CFR §100.27 (e)(11)

(ix) You may take salmon in the Upper Copper River District from May 15 through September 30 only.

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

Impact to Federal subsistence users/fisheries: Yes.

Sockeye Salmon are harvested by Federally qualified subsistence users in both the Chitina and the Glennallen Subdistricts. Federal subsistence fisheries regulations for the Copper River Area do not include a Sockeye Salmon escapement goal for the Copper River and management of the Federal subsistence fisheries has generally been based upon the Alaska Department of Fish and Game's established escapement goals and run estimation programs.

Establishing an OEG for Copper River Sockeye Salmon escapement goal that is 340,000 – 450,000 fish greater than the current Sustainable Escapement Goal (SEG) may lead to increased opportunity for Federally qualified subsistence users to harvest Sockeye and potentially Chinook Salmon in the Copper River watershed. This increase in opportunity would result from the restrictions to the State managed fisheries, which if managed to the proposed OEG, could significantly increase total escapement of Sockeye Salmon, and potentially Chinook Salmon, into the watershed.



Conversely, if this proposal is adopted, Federally qualified subsistence users who choose to participate in the State's fisheries may encounter significant foregone harvest opportunity during years of low abundance because the inriver State managed fisheries will likely be restricted to allow for more escapement to pass to the spawning grounds to achieve the increased goal.

Adoption of this proposal may allow additional Sockeye and Chinook Salmon to escape and spawn in the Copper River watershed. If the proposed new OEG is adopted and results in increased levels of future production and harvest opportunities, Federally-qualified subsistence users may benefit from potentially increased future opportunities and yields.

If this proposal was adopted, the establishment of this OEG would put the new Sockeye Salmon escapement goals for the system 50,000 fish below the upper end of the current SEG and 450,000 fish above the upper end of the current SEG.

Given that the escapement goal in the proposed OEG is significantly higher than the current SEG, there is a higher probability of increased restrictions in the State-managed fishery as more Sockeye Salmon would need to escape to the spawning grounds than in the past.

This could adversely impact Federally qualified subsistence users in two ways. First, Federally qualified subsistence users who choose to participate in the State's fisheries may encounter significant foregone harvest opportunities during times when the run is large enough to sustain subsistence harvest, but not large enough to meet the new OEG. Second, increasing escapement levels may result in higher chances of over-escapement, which could potentially cause conservation concerns that could threaten the future of the continuation of subsistence uses in the drainage.

Despite these potentially adverse impacts, the proposed OEG could be beneficial to Federally qualified subsistence users in two ways. Increased levels of Sockeye Salmon escapement could result in increased levels of Chinook Salmon escapement, which would lead to more harvest opportunities of Chinook Salmon by Federally qualified subsistence users. The new OEG could also benefit Federally qualified users since Federal management could provide additional harvest opportunities when the State fishery is restricted.

Federal position/recommended action: Neutral.

Federal Subsistence Management Program staff support conservation of the resource; however, adoption of the proposal may not result in additional future production. Adoption of this proposal may lead to complications from over escapement for both Sockeye and Chinook Salmon. If this proposal is adopted and the State of Alaska switches to managing for the provided OEG, the Federal subsistence fisheries will likely be managed independently of the State's allocative goals and inriver fishing period schedules because both will be based on allocations between State managed fisheries. The thresholds for restricting a Federal subsistence fishery when the stocks are meeting or exceeding biological or sustainable escapement goals are steep as Federal subsistence fishing is the priority above all other consumptive uses within identified Federal public lands in Alaska.



PROPOSAL 17 seeks to extend the lower boundary of the Chitina Subdistrict downstream to a north/south line beginning at the mouth of the Uranatina River and crossing the Copper River as designated by ADF&G regulatory markers.

Current State Regulations:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

(h) For the purposes of this section, the Chitina Subdistrict consists of all waters of the mainstem Copper River from the downstream edge of the Chitina-McCarthy Road Bridge downstream to an east-west line crossing the Copper River as designated by ADF&G regulatory markers located approximately 200 yards upstream of Haley Creek.

Current Federal Regulations:

Federal subsistence regulations do not define the Chitina Subdistrict of the Upper Copper River District. General Federal Subsistence fishing regulation definitions indicate the geographical area of a “Subdistrict” is the same as defined in State of Alaska regulations.

§100.4 Definitions.

Area, District, Subdistrict, and Section mean one of the geographical areas defined in the codified Alaska Department of Fish and Game regulations found in Title 5 of the Alaska Administrative Code.

§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: Possible/To be determined.

Adoption of this proposal would, through default reference to State regulations, expand the Chitina Subdistrict in Federal subsistence fishing regulations by an additional nine miles of the Copper River downstream to the Uranatina River. Currently, the Federal subsistence customary and traditional determinations for salmon and freshwater fish for the Chitina Subdistrict area are linked to state subdistrict the State of Alaska Subdistrict boundary definition. Adoption of this proposal may lead to expanding the area of the Federal subsistence fisheries and by reference some of the Federal subsistence customary and traditional use determinations of Federally qualified users for that area.



Additional Federal permitting requirements to identify harvest from the new area to be fished may benefit management of this expanded area. Additionally, adoption of this proposal could result in proposals to the Federal Subsistence Board to change the customary and traditional use determinations for salmon and fresh water species for the additional nine miles of the Copper River of interest.

Adoption of this proposal may lead to increases in lower Subdistrict harvests in the State managed personal use fishery potentially resulting in new challenges to fisheries managers. If this proposal is adopted, an unknown amount of salmon and fresh water species exploitation will take place in an area not formally open to the State's personal use fisheries. If a significant amount of effort is transferred to a lower point in the watershed, some reallocation of the inriver harvest will take place of fish formally harvested further up river.

If adopted, managers will be required to determine the impacts the new fishery will have on run timing, stocks being targeted, variations to previously utilized standards for inriver movement timing above the sonars, among other yet to be realized impacts. More importantly, if this proposal is adopted, the impacts on Federal subsistence opportunity for Federally qualified subsistence users would be unknown initially.

Federal Position/Recommended Action: Neutral.

Adoption of this proposal may provide additional opportunity for users who choose to participate in the Federal subsistence and personal use fisheries in the newly expanded area of the Copper River. Adoption of this proposal is not expected to increase Federal subsistence harvest by a significant amount, as users currently have annual harvest limit restrictions found in both State and Federal regulation.

Submitted By
Patricia Anderson
Submitted On
11/15/2017 8:26:43 AM
Affiliation



PC67
1 of 1

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Introduction -My name is Paul Owecke I have fished as a permit holder in the PWS setnet fishery since 1983. Prior to entering the fishery I was employed by ADFG as a Fish Culturist at Crooked Creek Hatchery, Kasilof and Main Bay Hatchery, PWS. I declined the Assistant Manager position offered at Main Bay as I was entering the fishery. Prior to ADFG, I was employed seasonally as a Fisheries Biologist for the State of Minnesota and crewed in various Alaska fisheries. I am a founding member of Prince William Sound Setnet Association. I now have a daughter who holds a PWS setnet permit, and have had three crew members enter the fishery. Our family of four all participate in the fishery.

Proposal 40 - Neutral. I understand this issue and experience similar frustration with drift nets being intentionally grounded next to setnets, but believe that this proposal puts an unenforceable burden on already over extended Protection officers. Should Fisheries Protection indicate this is a favorable means to address this issue I would support this proposal.

Proposal 41- Oppose. This proposal would create an enforcement problem first in defining a pinnacle, many of which are only pinnacles at certain stage of tide. Some pinnacles are submerged at high tide, and some pinnacles are points connected to the mainland at low tide. This places an unenforceable burden on Protection officers. In my experience this proposal is addressing an essentially non-existent problem for the drift fleet. It does not warrant the enforcement problems for the minimum benefit to the drift fleet.

Critical Background - Proposals 42-45 These four proposals should be reviewed with greater clarity on the circumstances that have led up to submission of these radical proposed changes.

First and foremost in 2016 and 2017, only the Main Bay Subdistrict was opened for harvest for the majority of fishing time in the Eshamy District. This was done in order to protect Coghill wild stock sockeye returning to Coghill Lake. In a typical season, with adequate Coghill escapement allowing harvest throughout the entire Eshamy District the concentration of effort and gear is spread over an area approximately seven times larger than Main Bay. This magnitude of reduction in fishing area forces a concentration of both set and drift gear into Main Bay that leads to overcrowding and conflict. However, Coghill wild stock returns are projected to return to expected levels in 2018, with brood year 2014 escapement reaching 42,384 (See Item 1 ADFG Coghill River Escapement for 2014) within a escapement goal of 20,000-60,000. This return to historic levels of return will allow management to again allow greater harvest district wide affording much greater area to both gear types. These proposals are an overreaction to a problem that has and will occur sporadically over time. The problem of reduced returns though do not warrant reducing fishing opportunity for the setnet gear group to the advantage of drift.

Another aspect leading to greater conflict in both 2016/17 is the decline in harvest of Copper River Sockeye that results in a much larger portion of the drift gillnet fleet to relocate to the Eshamy District. In 2016 the Copper River Harvest was 22% lower than the 10 year average, and 2017 was 60% lower than the 10 year average, with fishing time reduced 40% lower than the 10 year average (See Item 2 & 3 ADFG 2016/17 PWS Salmon Season Summary). Again,



reduced returns elsewhere led to greater concentration of effort and gear in an already reduced Eshamy District, and again reducing setnet opportunity with these proposals can not be the means of resolving harvest shortfall for the drift fleet.

Also, there is currently among the drift fleet a widespread perception that the setnet fleet is over harvesting as reflected in the restriction on fishing time imposed by the PWS Allocation Plan. In 2016 the setnet fleet was one tenth of one percent over their allocation, to trigger 2017 time restrictions. In 2017 the setnet fleet was two tenths of one percent over, and that will trigger time restrictions in 2018. The drift side will no doubt point out that in 2016 the setnet harvest was nearly double its allocated harvest. Close inspection of the data will also show that 2016 was the lowest year of setnet harvest in the five years used to calculate harvest average, and that the reason for percentage harvest increase was driven by historically low seine harvest for 2016. (See Item 4 ADFG News Release #76, 2018 Allocation Plan) Misguided understanding of harvest percentage has led to drift support of reducing setnet harvest by implementing these proposed regulation changes.

Making the situation even more prone to competition and conflict is the shortfall of sockeye returns to Main Bay Hatchery. 2016 saw a 41% shortfall in hatchery returns, 2017 saw a shortfall of 46% in hatchery returns. (See Item 2 & 3 ADFG 2016/17 PWS Season Summary) And, again shortfalls in harvest by the drift fleet do not justify reducing harvest capacity of setnetters through regulation change.

Proposal 42 - Oppose. Allocative in the extreme and would escalate conflict between set and drift users to intolerable levels.

This proposal attempts to give the impression that the nearshore areas of Main Bay are “traditional drift” areas” when in fact these nearshore areas have been historically the only area much of the setnet gear group utilizes for the majority of their season, and has been recognized by previous BOF action as the area BOF created as a setnet area of greatest use and importance.

With the advent of hatchery returns to the district in 1983 and the creation of a terminal fishery area at the head of Main Bay the BOF in a proactive move at the 1984 BOF meetings began development of the Main Bay Salmon Hatchery Harvest Management Plan 5AAC 24.367. In approving the plan the setnet group agreed to give up then current legal access to any surface waters beyond 50FM in the Terminal Harvest Area (THA) (See Item 5 Map Main Bay) and surface waters beyond 100 FM in the remainder of the district. All area in white inside of the THA and the remainder of Main Bay are the areas setnets were excluded from in 1984 (See Item 5 Map Main Bay), access to over 80% of the district was lost. In recognizing the need for additional beach access for the setnet group the BOF permitted the placement of setnets 50 FM apart inside the THA, from the established 100FM. The BOF then adopted a separation between drift and set gear of 25 FM, with the assumption that the areas between setnets placed 50 FM apart would not allow deployment of drift gillnets. This previous BOF action prohibiting



setnet access to offshore areas and designating setnet use only to nearshore areas is a clear indication of prioritizing those areas as the areas of expected setnet use. With expected use comes the lines, anchors and buoys required to anchor a setnet, anchoring is required by law 5AAC 39.105 (d) (2).

In 1985, the THA was divided and marked at 50 FM intervals by setnetters and the sites were assigned by a lottery to all interested permit holders. Most of those sites remain under State Division of Lands Shorefishery Lease to this day. That this area is now being claimed as historic and traditional beach area by the drift fleet does not reflect reality. The numbers of setnet permits and gear fished in this area and all of Main Bay have remained the same since 1984, contrary to claims otherwise in this proposal.

To now respond with a proposal that essentially locks in conflict and increases the area exclusively accessible to drift gear is not equitable, safe or enforceable. What this proposal does is essentially create a 10FM drift, free for all zone, between virtually every setnet site inside the the THA. The outcome would in effect turn the entire THA into a drift dominated harvest area with 50FM straight line setnets alternated between 150FM drift nets fished in any configuration. Setnet gear would be made essentially ineffective. This is an obvious attempt to convert a setnet fishing area into a drift fishing area which would be allocative in the extreme, and a drastic departure from the existing Main Bay Harvest Management Plan.

In actual outcome, if approved, visualize an opening morning, 20 foot, 90 HP setnet skiffs lined up 50 FM apart in the THA, spaced between every setnet skiff are several 32 foot 600 HP drift boats. Each skiff sets in a straight line 50 FM of gear. Each drift boat sets concurrently 150FM of gear in any configuration between setnets. The scene would be total chaos with setnet harvest cut to the point of being not worth setting gear in the THA.

This proposal is in direct opposition to BOF precedence within the district historically. As originally passed by the BOF in 1984, in the Crafton Island Subdistrict, setnets were able to be placed 100FM apart with a separation between set and drift gear set at 50FM. As in the THA the assumption was that drift gear would not be permitted between setnets. However, drift operators regularly deployed gear between setnets and the level of conflict between drift and set gear had escalated in the Crafton Island Subdistrict to the point that Fish and Wildlife Protection in the 1996 BOF cycle submitted a proposal to increase the distance between set and drift gear from 50FM to 60FM. This was done in order to prevent the type of conflict this proposal 42 would only escalate. The 1996 proposal by protection passed and has reduced conflict greatly in the Crafton Island Subdistrict. (5AAC 24.335) Because of the demonstrated reduced conflict as a result of this action we request that the BOF increase the 25FM distance between drift and setnet gear inside the THA to 30FM. The BOF has precedence to guide its efforts.

This proposal also requests the reduction of 100FM setnets in the outer portion of Main Bay be reduced to 50FM. This is blatantly allocative, has no basis for approval and would without question increase the number of locations throughout the district that setnets are deployed, in



direct opposition to the requests of the drift fleet to reduce setnet gear locations. If 100FM nets are reduced to 50FM, that gear reduction would require additional 50FM net locations elsewhere in Main Bay or the district.

Of great significance is that during approximately 50% of every fishing season there is access to harvest in the Alternating Gear Zone (AGZ)(See Item 5 Map Main Bay) at the head of Main Bay with drift and set gear taking alternating periods inside the AGZ to harvest hatchery return buildups. When the AGZ is open to setnet gear, virtually all setnet gear in Main Bay is relocated to the AGZ giving total beach access to the drift fleet throughout Main Bay, and they are able to harvest buildups with all setnet lines bouys and anchors remaining in place. This drift harvest has been occurring for decades and is not prevented by the lines and bouys in place.

Proposal 43 - Oppose. This proposal would remove completely the legal protections afforded the setnet user group in setting and operating stationary gear. As is enforced presently, whenever a setnet is deployed, if a drift net is closer than legal distance it is the responsibility of the drift user to relocate in order to abide by legally established distances between gear types. If as proposed there is no legal consequence for compliance by drift operators there would be no consequence for not abiding by the intent of established set backs between gear types. And, with no timeline established for a drift net to be compliant with legal separation of gear types a drift operator could legally take an entire fishing period to come into compliance. In effect, the proposal asks that illegally operated drift gear no longer can be deemed illegal and the setnet operator be obligated to allow unlimited time for the drift operator to move gear that is always considered legal if is deployed prior to a setnet.

In practice this would encourage and result in drift operators setting gear next to and concurrently with set gear throughout Main Bay and then give unlimited time for drift retrieval. This would be highly allocative, unenforceable and result in a level of conflict that would eliminate safe and orderly operations.

The proposal states that the issues to address are setnet crews illegally deploying and operating boats and gear independently during openers. However, (5AAC 39.107 d) makes clear that this is not illegal and permitted in setnet fisheries statewide. Stated as an issue is that "a drift operation needs to be able to retrieve its gear if it is deployed before a setnet is deployed." There is no instance of a drift operator ever being prevented from retrieving gear by a setnetter in order to comply with the law. The law is in place to prevent gear conflict, and past enforcement, and common sense, has been to require mobile gear to relocate when not compliant. To not require compliance makes gear separation ineffective and the fishery unsafe and unmanageable.

Stated as an issue is reduced drift access to Main Bay buildups. Unstated is the fact that the buildups often occur in offshore areas not accessible to setnet harvest by law. Also, unstated is that during approximately 50% of every fishing season there is access to harvest in the



Alternating Gear Zone (AGZ)(See Item 5 Map Main Bay) at the head of Main Bay with drift and set gear taking alternating periods inside the AGZ to harvest hatchery return buildups. When the AGZ is open to setnet gear virtually all setnet gear in Main Bay is relocated to the AGZ giving total beach access to the drift fleet throughout Main Bay and they are able to harvest buildups with all setnet lines bouys and anchors remaining in place. When the drift fleet does have access to the AGZ every other period they in fact harvest the buildups they claim they are denied.

This proposal, without accurate justification, asks to eliminate longstanding regulation that is enforced uniformly statewide that a drift operator be required to relocate when his gear is non-compliant with gear type distance separations. To exempt drift operators from complying with established law opens the door to conflict, allocation imbalance and safety issues.

Proposal 44 - Oppose. This proposal fails to recognize that there currently exist detailed regulations that permit setnet crew to deploy and operate gear independently of the permit holder and that it is uniform in law and practice statewide. The authors assume that 5AAC 24.331(G)(3) is the final word on operation of stationary gear. However, 5AAC 39.107 goes into great detail to define the operation of both mobile and stationary gear and is uniform for fisheries throughout the state. To further clarify, in PWS General Provisions page 41 Item (31) a permit holder can be not only in a boat independent of other boats associated with their permit they may also be in a structure associated with providing shelter for their operation.

Current regulation specifically allows a permit holder to set all three sites at once with independent crews and boats. To prevent this would break with statewide regulation covering all setnet operations. More importantly, it would lead to chaos in the PWS fishery and extreme loss of harvest opportunity for the setnet fleet.

If a permit holder were required to be in a boat that set all gear, the permit holder would at the beginning of an opener be able to deploy a single net. By the time they had set one net travelled around all deployed drift nets and then arrived at the second location to deploy a net they would find drift nets deployed preventing deployment of any additional setnet gear. In effect this proposal would cut by 2/3rds the amount of gear a setnet permit holder could deploy during any opener district wide.

The proposed change would also require the permit holder to be in the boat when all gear is being retrieved. This would prevent the timely removal of nets at the end of fishing periods, but more importantly would not allow multiple boats to retrieve nets in order to have gear and crew off the water in the event of storm conditions approaching. This change poses a safety threat to participants.

Current regulation is effective, uniform statewide and enforced. The proposed change is extremely allocative and would promote intense conflict and safety issues between gear types.



Proposal 45 - Oppose. This proposal falsely claims that there has been a marked increase in unused setnet sites over time and that these sites “preclude the drift fleet from historic beach area.”

The number of active setnet permits and gear has remained constant since the inception of the Main Bay hatchery harvest in 1983. There was in fact more of both set and drift gear concentrated in Main Bay in 2016/17 as management moved the majority of the harvest into Main Bay to protect wild Coghill stocks. However, all set gear was deployed in compliance with the law and did not prevent drift harvest. Statewide there are no caps on the amount of gear a setnet operator is allowed to place for operations.

Since the inception of the setnet fishery, it has been common practice for setnet operators to open a fishing period in one location and relocate to outside beach areas, similar to drift operators relocating to areas of greater fish concentration. When relocating to a new location, if lines and bouys are not in place, drift gear is often deployed on clearly marked setnet sites and drift operators refuse to allow deployment of setnet gear. They will not move gear in order to raise lines and attach bouys in order to set a net, and a setnet operator has no authority to require a drift operator to remove his gear. Without the ability to have lines in place, participation in the fishery is denied.

Throughout the state there is no limitation on the ability of setnets to be relocated or the number of sites utilized for setnet use. Each PWS setnet permit typically has six sites with lines and bouys in place to be able to participate in the fishery.

The issue as stated by CDFU also states that setnet lines and bouys “preclude” drift harvest. They are implying that lines set 50 to 100FM apart prevent drift harvest. But, in Proposal 42 CDFU proposes that by reducing distances between set and drift gear that they be allowed to harvest in an area 10FM or sixty feet wide between setnets. Why in one area are they able to harvest within sixty feet while in other areas they claim inability to harvest in 50 to 100 fathoms. This proposal is a blatant move to prevent setnet harvest by not allowing adequate gear to be in place to harvest effectively or safely.

Also, as stated in previous BOF meetings the lines anchors and bouys placed for setnet operation are put in place in times of calm seas. This proposal would at times require unsafe operation by forcing the raising of lines and placing bouys in whatever sea state was occurring.

This proposal has been submitted in similar form in three previous BOF cycles for PWS. Each time the board has rejected the proposal for safety and conflict reasons. Nothing has changed since, and the number of sites occupied has not increased. In the time period since those previous proposals the drift fleet has effectively carried out their harvest with setnet gear in



place. There has been no displacement of the drift fleet from historic areas as stated. No additional regs are needed to facilitate drift harvest.

Proposal 46 - Support. I do not support one party or the other in this proposal. However, I do support ADFG returning to all previous marked closure and boundary lines statewide. There has been widespread disruption in fisheries statewide by adhering to the incorrect coordinates currently assigned to historic closure and boundary lines. The coordinates need to be updated to reflect closure and boundary lines as used over time.

Proposal 48 - Oppose. This fishery needs to be returned to a cost recovery fishery as it was intended. It is currently managed as a common property fishery in non-compliance with regulation 5AAC 24.370 that prevents seine operation prior to July 18. As currently managed it is now allowing the seine fleet to effectively target wild and hatchery sockeye salmon returning to Coghill River and Main Bay Hatchery. Current management places no burden of conservation on this fishery and it regularly harvests threatened Coghill wild stocks and fully allocated Main Bay hatchery sockeye stock.

Proposal 49 - Support Option 1. This fishery needs to be returned to a cost recovery fishery as it was intended. It is currently managed as a common property fishery in non-compliance with regulation 5AAC 24.370 that prevents seine operation prior to July 18. As currently managed it is now allowing the seine fleet to effectively target wild and hatchery sockeye salmon returning to Coghill River and Main Bay Hatchery. Current management places no burden of conservation on this fishery and it regularly harvests threatened Coghill wild stocks and fully allocated Main Bay hatchery sockeye stock.



11/7/2017

Fish Counts - Sport Fish - ADF&G



Alaska Department of Fish and Game

[ADF&G Home](#) • [Fishing](#) • [Sport](#) • [Fish Counts](#)

Fish Count Data Search

Location: Coghill River	Species: Sockeye	Year: 2017 2016 2015 2014 2013	Submit
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COGHILL RIVER SOCKEYE FOR 2014

Location: Coghill River Species: Sockeye Method: Weir	The selected years are color-coded in the graphs below: 2014
Daily Counts 	Cumulative
Description: The Coghill River weir is approximately 1.75 miles up river from tidewater. The fishery occurs along the entire length of the river and in the lake, but the area within 300 feet of the weir is closed. Fish can travel from salt water to the weir within a few hours but this is highly dependant on water flow and tide level. The current escapement goal for Sockeye is 20,000 to 60,000.	
Contact: PWS Comm Fish Research Biologist. (907) 424-3212	

New
Search

50 records returned for the years selected. Dashes indicate days with no count.
[\[Export results in Excel format\]](#)

Date 2014	Count 2014	Cumulative 2014	Notes for 2014
Jul-27	350	42,384	
Jul-26	905	42,034	Last day of counts for season
Jul-25	1,094	41,129	Last day of weir counts will be tomorrow
Jul-24	1,054	40,035	
Jul-23	1,271	38,981	
Jul-22	828	37,710	
Jul-21	581	36,882	
Jul-20	432	36,301	

<http://www.adfg.alaska.gov/sd/FishCounts/index.cfm?ADFG=main&displayResults>

1/3

Item 1: 2014 Coghill River Sockeye Fish Count



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES NEWS RELEASE



*Sam Cotten, Commissioner
Scott Kelley, Director*



Contact:
Cordova Management and Research Staff: Jeremy Botz,
Charles Russell, Steve Moffitt, and Stormy Haught
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Cordova ADF&G
401 Railroad Avenue
P.O. Box 669
Cordova, AK 99574
Date Issued: 10/14/2016

2016 PRINCE WILLIAM SOUND SALMON SEASON SUMMARY

The following is an overview of the 2016 Prince William Sound (PWS) Area commercial salmon season. Please note that numbers in the narrative are rounded for simplicity and all data are considered preliminary.

The 2016 PWS Area commercial salmon harvest was 19.13 million fish. Harvest was composed of 13.27 million pink, 1.94 million sockeye, 3.43 million chum, 478,000 coho, and 12,000 Chinook salmon. The 2016 harvest included 13.67 million (71.5%) commercial common property fishery (CCPF), and 5.46 million (28.5%) hatchery cost recovery and broodstock fish.

GILLNET FISHERIES

COPPER RIVER DISTRICT

The 2016 preseason commercial harvest forecast for the Copper River District was 21,000 Chinook, 1.62 million sockeye, and 201,000 coho salmon. Gulkana Hatchery was projected to contribute 169,000 sockeye salmon to the CCPF harvest. The commercial salmon fishing season in the Copper River District began on Monday, May 16. Through the end of July, the commercial fishery was open 756 hours, 96 hours more than the recent 10-year average. The sockeye salmon harvest of 1.14 million fish was 22% less than the previous 10-year (2006–2015) harvest average of 1.46 million sockeye salmon. The average sockeye salmon weight of 5.3 lb was the second smallest on record. The number of wild sockeye salmon in the Copper River District CCPF harvest was 968,000 or 85%. Gulkana Hatchery contribution to the sockeye salmon CCPF was 153,000 fish or 13% of the harvest. Main Bay Hatchery contributed 16,800 fish, or 2% of the Copper River harvest. The CCPF harvest of 11,600 Chinook salmon was below the previous 10-year (2006–2015) average harvest of 17,200. The season total coho salmon commercial harvest of 365,000 fish was nearly double the previous 10-year (2006–2015) average harvest of 201,000 coho salmon. The 2016 preliminary sonar inriver estimate was 802,000 salmon and was within the 712,000–1,100,000 salmon range of the inriver goal. Spawning escapement to Copper River delta systems based on aerial survey indices was 51,600 sockeye salmon, and was below the sustainable escapement goal (SEG) range of 55,000–130,000 fish. However, pilot availability and poor survey conditions likely contributed to the lower counts and



2016 PWS Salmon Season Summary

October 14, 2016

it is likely that the goal was achieved. Coho salmon spawning escapement to the Copper River Delta based on aerial survey indices was 65,700 and was within the SEG range of 32,000–67,000 fish. Preliminary estimates of inriver Chinook salmon abundance indicate that spawning escapement was below the lower bound SEG of 24,000 fish.

BERING RIVER DISTRICT

The 2016 preseason commercial harvest forecast for the Bering River District was 14,000 sockeye, and 46,000 coho salmon. The sockeye salmon commercial harvest of 9,400 fish was 23% above the previous 10-year (2006–2015) harvest average of 7,600 fish. The coho salmon commercial harvest of 81,400 was 80% above the previous 10-year (2006–2015) harvest average of 45,300 fish. Commercial fishing effort in both the sockeye and coho salmon fisheries was high due to productive fishing in the eastern portion of the Copper River Delta. The aerial escapement index of 21,700 sockeye salmon was within the SEG range of 15,000–33,000 fish. Aerial surveys of coho salmon produced an escapement index of 25,800 fish that was within the SEG range of 13,000–33,000 fish.

COGHILL DISTRICT

Prince William Sound Aquaculture Corporation (PWSAC) forecast a 2016 run of 2.15 million chum and 20,700 coho salmon to Wally Noerenberg Hatchery (WNH) and required 1.17 million (55%) chum and 2,700 (13%) coho salmon for cost recovery and broodstock. The CCPF drift gillnet harvest of chum salmon in the Coghill District was 1.83 million fish. PWSAC harvested 942,000 chum salmon for cost recovery and broodstock. The CCPF drift gillnet harvest of sockeye salmon in the Coghill District was 67,100 fish. The proportion of wild sockeye salmon in the Coghill District CCPF harvest was 10,500 fish (16%). Pink salmon CCPF drift gillnet harvest in the Coghill District was 9,200 fish. The proportion of wild pink salmon in the Coghill District CCPF harvest was 29%. The CCPF drift gillnet harvest of coho salmon in the Coghill District was 6 fish.

The sockeye salmon run forecast for Coghill River was 110,000 fish. The Coghill River weir passed 8,708 sockeye salmon, coming in below the SEG range of 20,000–60,000 fish.

ESHAMY DISTRICT

PWSAC forecast a run of 1.60 million Main Bay Hatchery enhanced sockeye salmon. The CCPF harvest of sockeye salmon in the Eshamy District was 656,000 fish, 41% below the forecast. The proportion of wild sockeye salmon in the Eshamy District CCPF harvest was 3% (19,200 fish).

UNAKWIK DISTRICT

Unakwik District CCPF drift gillnet harvest was 340 sockeye salmon, which was well below the 10-year average of 3,000 sockeye salmon.

MONTAGUE DISTRICT, PORT CHALMERS SUBDISTRICT

PWSAC forecast a run of 330,000 chum salmon to the Port Chalmers remote release site in 2016. The drift gillnet gear group had access to the Port Chalmers Subdistrict in 2016 under the Prince William Sound Management and Salmon Enhancement Allocation Plan. The CCPF drift gillnet harvest of chum salmon in the Montague District was 200,500, 40% below forecast. The proportion of wild chum salmon in the Port Chalmers Subdistrict CPF harvest 11%.

PURSE SEINE FISHERIES



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES NEWS RELEASE



*Sam Cotten, Commissioner
Scott Kelley, Director*



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Date Issued: 10/03/2017

2017 PRINCE WILLIAM SOUND SALMON SEASON SUMMARY

The following is an overview of the 2017 Prince William Sound (PWS) Area commercial salmon season. Please note that numbers in the narrative are rounded for simplicity and all data are considered preliminary.

The 2017 PWS Area commercial salmon harvest was 56.15 million fish (Table 1). Harvest was composed of 48.73 million pink, 1.43 million sockeye, 5.42 million chum, 554,000 coho, and 13,600 Chinook salmon. The 2017 harvest included 50.34 million (90%) commercial common property fishery (CCPF), and 5.82 million (10%) hatchery cost recovery and broodstock fish.

The estimated value of the combined commercial salmon harvest, including hatchery sales, was approximately \$127.98 million. During the 2017 season, 518 drift gillnet, 29 set gillnet, and 229 purse seine permit holders fished in at least one fishing period. Drift gillnet exvessel harvest value was an estimated \$38.47 million (average permit earnings of \$74,200); set gillnet exvessel harvest value was an estimated \$1.56 million (average permit earnings at \$53,800); and purse seine exvessel harvest value was an estimated \$71.79 million (average permit earnings at \$313,500). Revenue generated for hatchery operations was approximately \$16.16 million.

GILLNET FISHERIES

COPPER RIVER DISTRICT

The 2017 preseason commercial harvest forecast for the Copper River District was 4,000 Chinook, 889,000 sockeye, and 207,000 coho salmon. Gulkana Hatchery was projected to contribute 173,000 sockeye salmon to the CC PF harvest. A conservative management strategy was implemented due to the weak Chinook and sockeye salmon forecast. This strategy included reduced frequency and duration of fishing periods to match salmon run entry. The inside closure area was expanded and remained closed until mid-June. The expanded area included waters inside the barrier islands east of Kokinhenik Bar and west of Grass Island Bar. The anticipated first fishing period was skipped and the district opened on Thursday, May 18. Total fishing time through July was reduced by 40% compared to the 10-year average. The Copper River sockeye salmon harvest of 570,000 fish was 60% less than the previous 10-year (2007–2016) harvest average of 1.43 million sockeye salmon and 36% below forecast. The average sockeye salmon



2017 PWS Salmon Season Summary

October 03, 2017

weight of 5.5 pounds was the third smallest on record. The number of wild sockeye salmon in the Copper River District CCPF harvest was 530,000, or 93%. Gulkana Hatchery contribution to the sockeye salmon commercial harvest was 29,300, or 5% of the Copper River harvest, and was 90% below forecast. Main Bay Hatchery contributed 10,500 fish, or 2% of the Copper River harvest. The CCPF harvest of 13,100 Chinook salmon was below the previous 10-year (2007–2016) average harvest of 15,400. The current season total coho salmon commercial harvest of 288,000 fish is well above the previous 10-year (2007–2016) harvest average of 206,000 coho salmon. The 2017 preliminary sonar inriver estimate was 723,426 salmon and was within the 712,000–1,100,000 salmon range of the inriver goal. Spawning escapement to Copper River delta systems based on aerial survey indices was 57,000 sockeye salmon, and was within the sustainable escapement goal (SEG) range of 55,000–130,000 fish. Copper River Delta coho salmon spawning escapement monitoring is ongoing, but peak escapement counts are within the SEG range of 32,000–67,000 fish. Preliminary estimates of inriver Chinook salmon abundance are not available at this time.

BERING RIVER DISTRICT

The 2017 preseason commercial harvest forecast for the Bering River District was 4,000 sockeye, and 48,000 coho salmon. The sockeye salmon commercial harvest of 2,600 fish was 30% below the previous 10-year (2007–2016) harvest average of 3,700 fish. The coho salmon commercial harvest of 111,000 was more than double the previous 10-year (2007–2016) harvest average of 47,900 fish. Commercial fishing effort in the coho salmon fisheries was high due in part to productive fishing in the eastern portion of the Copper River Delta. The aerial escapement index of 18,800 sockeye salmon was within the SEG range of 15,000–33,000 fish. Bering River District coho salmon spawning escapement monitoring is ongoing, but peak escapement counts are within the SEG range of 13,000–33,000 fish.

COGHILL DISTRICT

Prince William Sound Aquaculture Corporation (PWSAC) forecast a 2017 run of 1.97 million chum and 230,000 coho salmon to Wally Noerenberg Hatchery (WNH) and required 818,000 (42%) chum and 2,700 (1%) coho salmon for cost recovery and broodstock. The CCPF drift gillnet harvest of chum salmon in the Coghill District was 2.17 million fish. The proportion of wild chum salmon in the Coghill District CCPF harvest was 5%. PWSAC harvested 724,000 chum salmon for cost recovery and broodstock. The total chum salmon return to WNH was 3.26 million fish and was 65% above forecast. The CCPF drift gillnet harvest of sockeye salmon in the Coghill District was 112,200 fish. The proportion of wild sockeye salmon in the Coghill District CCPF harvest was 24% (28,300 fish). Pink salmon CCPF drift gillnet harvest in the Coghill District was 662,000 fish. The proportion of wild pink salmon in the Coghill District CCPF harvest was 69%. The CCPF drift gillnet harvest of coho salmon in the Coghill District was 14,200 fish, 93% below forecast.

The sockeye salmon run forecast for Coghill River was 74,000 fish. The Coghill River weir passed 50,312 sockeye salmon, which is within the SEG range of 20,000–60,000 fish.

ESHAMY DISTRICT

PWSAC forecast a run of 1.15 million Main Bay Hatchery enhanced sockeye salmon. The CCPF harvest of sockeye salmon in the Eshamy District was 621,000 fish, 46% below the forecast. The proportion of wild sockeye salmon in the Eshamy District CCPF harvest was 9% (55,800 fish).



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES



NEWS RELEASE

Sam Cotten, Commissioner
Scott Kelley, Director



Contact:
Jeremy Botz, Gillnet Area Management Biologist
Charlie Russell, Seine Area Management Biologist
Stormy Haight, Area Research Biologist
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Prince William Sound Area Office
401 Railroad Avenue, PO Box 669
Cordova, AK 99574-0669
Date Issued: Tuesday, September 26, 2017
Time: 12:00 pm

Prince William Sound Salmon Fishery News Release #76 2018 Allocation Plan (5 AAC 24.370)

The department calculated the exvessel value percentages for each gear group using the Commercial Operators Annual Report (COAR) area specific prices and weights and ADF&G harvest estimates of PWSAC enhanced fish by species and gear type (Table 1). The trigger points for corrections in allocation are 45% for purse seine and drift gillnet gear groups and 5% for the set gillnet gear group. The five-year (2012–2016) average value percentages for each gear type are 46.7% drift gillnet, 53.3% purse seine, and 5.2% set gillnet (Table 2). As a result, the purse seine gear group will have exclusive access to the Port Chalmers Subdistrict in 2018 and the set gillnet gear group will be limited to 36 hours per week in the Eshamy District starting July 10, 2018.

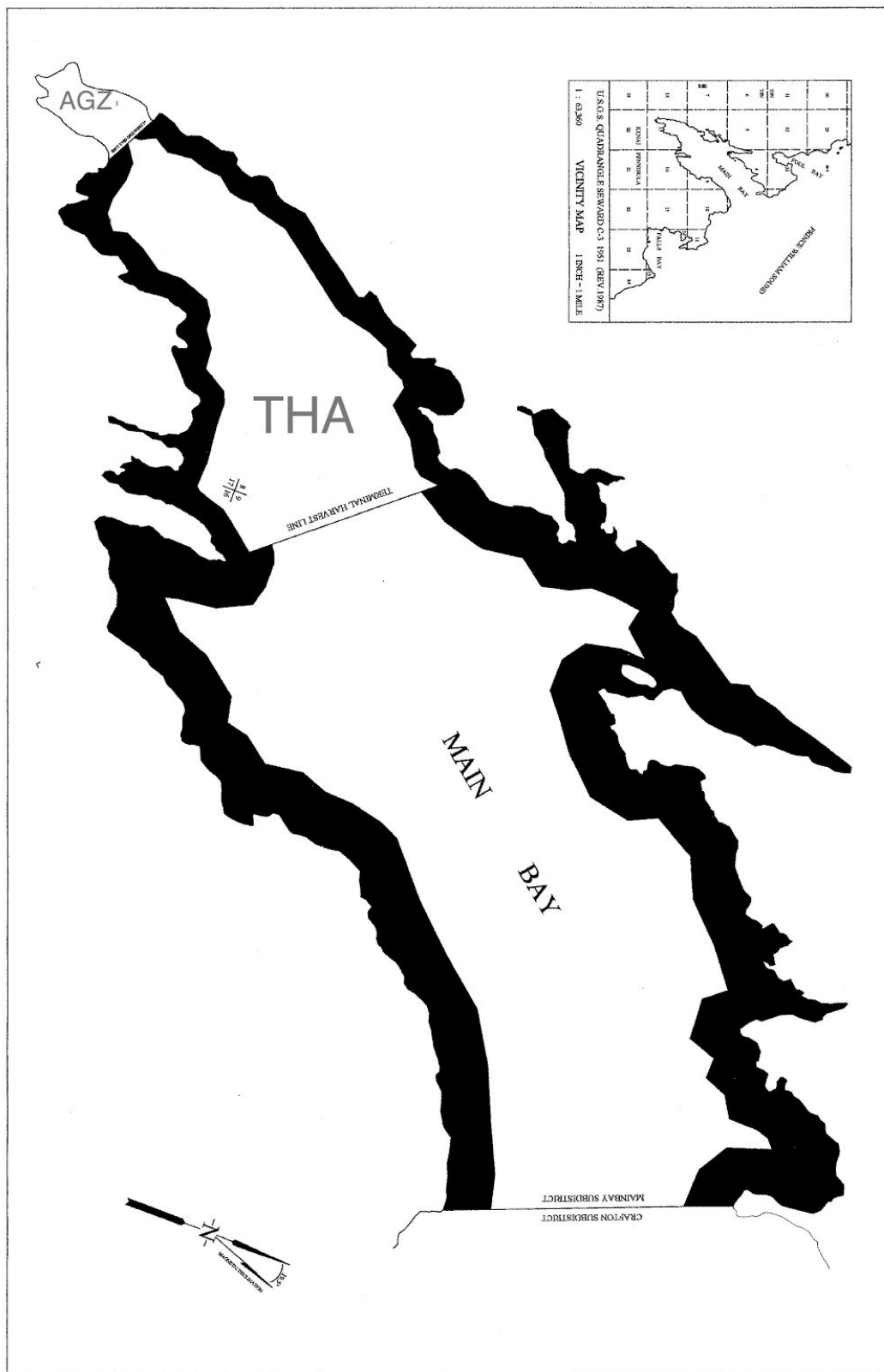
In December 2005, the Alaska Board of Fisheries modified the Prince William Sound Management and Salmon Enhancement Allocation Plan (5AAC 24.370). The modifications eliminated wild stocks and Valdez Fisheries Development Association enhanced fish from the plan and allocate only Prince William Sound Aquaculture Corporation (PWSAC) enhanced fish. Additionally, a five-year average exvessel value is now used rather than annual value percentages. The set gillnet gear group allocation is now 4% of the five-year average value of PWSAC enhanced salmon stocks. The drift gillnet and purse seine gear groups each receive 50% of the remaining value of PWSAC enhanced salmon stocks. If the set gillnet gear group exceeds 5% of the five-year average value of PWSAC enhanced stocks, they will be limited to no more than 36 hours of fishing time per week beginning July 10 in the year following this calculation. If the drift gillnet gear group harvest value is 45% or less, then in the year following the current calculations, the drift gillnet gear group shall have exclusive access to the Port Chalmers Subdistrict to harvest enhanced salmon returns from June 1 through July 30, during fishing periods established by emergency order. If the purse seine gear group harvest value is 45% or less, then in the year following the current calculations, the purse seine gear group shall have exclusive access to the Esther Subdistrict to harvest enhanced salmon returns from June 1 through July 20, during fishing periods established by emergency order.

Table 1. The 2016 COAR price per pound by gear type, species, and area.

2016 Species	Drift Gillnet		Purse Seine		Set Gillnet
	Copper/Bering	Prince William Sound	Prince William Sound	Prince William Sound	Prince William Sound
Chinook	\$6.27	\$4.29	\$1.07		\$4.26
Chum	\$0.19	\$0.58	\$0.54		\$0.62
Coho	\$1.52	\$1.08	\$0.82		\$0.26
Pink	\$0.15	\$0.21	\$0.28		\$0.23
Sockeye	\$2.78	\$1.72	\$1.58		\$1.61

Table 2. Values and percentages by gear type for Area E.

Year	Drift Gillnet		Purse Seine		Set Gillnet	
	Value	Percentage	Value	Percentage	Value	Percentage
2012	\$30,375,938	58.7%	\$21,361,107	41.3%	\$3,125,836	5.7%
2013	\$25,052,932	31.2%	\$55,194,763	68.8%	\$2,405,648	2.9%
2014	\$20,330,294	57.7%	\$14,894,564	42.3%	\$2,725,780	7.2%
2015	\$13,178,750	35.6%	\$23,825,054	64.4%	\$1,930,673	5.0%
2016	\$13,947,405	86.0%	\$2,279,015	14.0%	\$1,821,330	10.1%
Grand Total	\$102,885,318		\$117,554,502		\$12,009,266	
5-yr Average		46.7%		53.3%		5.2%



Item 5: Main Bay Map Prepared by Jeff Bassett-Mapping Professional



Submitted By
Philip Broyles
Submitted On
11/15/2017 4:55:39 PM
Affiliation

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Prince William Sound
Aquaculture Corporation

Glenn Haight
P.O. Box 115526
Juneau, AK 99811-5526

Nov. 10, 2017

Re: BOF proposals 47, 48 and 49

Dear Mr. Haight:

Please accept the following comments regarding Prince William Sound proposals numbers 47, 48 and 49 to the Alaska Board of Fisheries (BOF).

The three aforementioned proposals all deal with the Prince William Sound Management and Salmon Enhancement Allocation Plan. The Prince William Sound Aquaculture Corporation (PWSAC) provides enhanced salmon to all user groups. PWSAC does not allocate any fish to any one user group. Fish returning to our hatcheries pass through many districts on their way to the natal hatchery. The BOF produced a Management and Allocation plan based on PWSAC's salmon production. I think it important that the BOF also understand that when PWSAC sets its annual budget that portions of that budget are funded through the cost/recovery fishery in the hatchery SHA and on occasion in the THA. PWSAC strives to cost recover portions of the budget from hatchery returns based upon the cost to operate those hatcheries that contribute most to a particular gear type. For example, pink salmon are caught primarily by the purse seine fleet. Thus, the cost to operate the pink salmon hatcheries will come from selling pink salmon. These fish would otherwise be caught by the purse seine fleet. Conversely, the gillnet fleet primarily harvests sockeye salmon returning to Main Bay and Gulkana hatcheries and chum salmon returning to Wally Noerenberg Hatchery. The cost to operate those hatcheries will come from those species that would otherwise be caught by the gillnet fleet.

During its yearly spring budgeting process PWSAC examines ADFG five year rolling average catch data as called for in the enhanced salmon allocation plan and addresses imbalances in the plan when feasible by shifting part of the cost recovery burden from one gear group to the other, at times up to two million dollars. Taking action on proposals 47 and 49 would complicate the budgeting process currently in place as well as 5 AAC 24.370(g).

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

P.O. Box 1110 • Cordova, Alaska 99574
P. 907 424 7511 • F. 907 424 7514
www.pwsac.com



Prince William Sound
Aquaculture Corporation

I also need to point out that PWSAC has the intention of replacing the chum salmon being stocked at AFK hatchery with pink salmon following the schedule that was provided to us by the Alaska Department of Fish and Game (ADF&G), which will phase in pink salmon production and phase out chum salmon production over four years. The pink salmon egg take number at the AFK hatchery was increased in 2017 and the chum salmon egg incubation number was reduced. A further increase of pink salmon egg take numbers is expected to occur in 2019 at which time chum salmon eggs will no longer be incubated at that facility.

Proposal 48, addresses action that currently is made by emergency order through ADF&G to allow the harvest of enhanced salmon. As mentioned earlier, PWSAC is planning to end the chum salmon enhancement program at the AFK hatchery in the SW District of Prince William Sound according to the schedule provided by ADF&G. Changing this regulation would become obsolete once chum salmon stop returning to the AFK hatchery. However, if ADF&G prefers this change it would not impact PWSAC operations.

Thank you for allowing PWSAC to comment on these three proposals. I will be attending the BOF meeting in Valdez and would be available to provide more information at that time if needed.

Sincerely,

Timothy Moore
Board President
Prince William Sound Aquaculture Corporation

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Board of Fish 2017 Written Comment

Mr. Chair and Board Members,

Thank you for the opportunity to comment prior to the upcoming 2017 Board of Fish Meeting. My name is Forest Jenkins and I currently live in Trempealeau, Wisconsin. I am the current Prince William Sound Setnetter's Association President, and I have been an active PWS setnet permit holder for 5 years. Prior to purchasing my own permit, I was a setnet crew member for 5 seasons in the Eshamy District.

On behalf of the Prince William Sound Setnetter's Association, we cohesively oppose Proposals 42-45. Comments on these proposals are on behalf of the PWSSA.

Due to Wild Coghill Sockeye escapement concerns, below average Copper River Sockeye returns, and weak Main Bay Hatchery Sockeye returns over the 2016 and 2017 seasons, there has been a drastic increase in the concentration of both set and drift gillnet gear within the Main Bay Subdistrict. As a result, this has intensified the competition and gear conflict within this area. These factors should be looked at alongside these Proposals to have a greater understanding of the issues that triggered the submission of these profound proposals. These proposals would only increase this intensified level of conflict and suppress the set gillnet harvest dramatically.

Proposal 40: Neutral. I completely understand the author's motive for writing Proposal 40 in order to reduce conflict between the set and drift gillnet gear groups. I too have experienced a great deal of conflict with members of the drift gillnet fleet creating stationary sets directly in front of a setnet. I believe law enforcement does need a straight forward avenue to addressing this issue, but I do see potential challenges in enforcing this proposed regulation change. If, in fact, current law enforcement approves this change to be a suitable way to enforce this issue, I would support Proposal 40.

Proposal 41: Oppose. The suggested regulation change to allow drift gill nets to be deployed inside the shore end of a setnet is unnecessary, unenforceable, and significantly increases conflict between gear groups. Depending on the tide fluctuation and water depth, it would be very difficult to determine which set gillnets had legal waters inside their shore end. Determining this definition of a pinnacle in such a dynamic environment is an unnecessary responsibility to be placed on law enforcement. The challenges that protection officers would be presented and the high potential for escalated gear conflict are not worth the very little, if any, benefit to the drift fleet that is being requested by the author.

Proposal 42: Oppose. Proposal 42 is extremely allocative, introduces even more enforcement challenges, jeopardizes the safety of all users, and only intensifies the gear conflict between set and drift gillnet permit holders in an already extremely high conflict area.



The author states that there is a lack of access to traditional beach drifts for the gillnet fleet inside Main Bay. This is blatantly inaccurate, as the drift fleet has sole access to all waters outside the offshore end of a setnet buoy in addition to all the open beach access that is a legal distance from a deployed set gillnet. In the Main Bay Subdistrict outside of the THA, setnet gear must be 100 fathoms apart while drift gear only has to be 25 fathoms from a deployed setnet. This provides the drift fleet with beach access between every setnet site in Main Bay outside of the THA.

CDFU claims that they are losing access to 'traditional' beach drifts. In fact, the majority of the beach access inside the THA has been designated and prioritized for the setnet fleet dating back to the 1984 BOF meetings when the Main Bay Salmon Hatchery Harvest Plan was established (5AAC 24.367). The setnet fleet gave up access to all open waters outside of 50 fathoms within the THA and all waters outside of 100 fathoms in the rest of the Main Bay Subdistrict. In exchange, set netter's are allowed to fish their gear 50 fathoms apart inside the THA, while the distance between set and drift gear was set at 25 fathoms. These regulations were placed with the assumption that drift gear would not be able to be legally set between set nets 50 fathoms apart. This has not been the case, as drifters continually claim that they can legally set between our nets and hold their position within a couple fathoms. Illegally, they essentially become setnetters with the added ability to maneuver their 150 fathom net that runs between our gear back to the beach.

A majority of the beach sites within Main Bay THA have been leased through the State Division of Lands Shore Fishery Lease Program since 1985. This lease program grants us priority access to a 50 fathom section of shoreline that we have staked and annually pay for through the State of Alaska. The suggested change in regulation would essentially delegitimize all lease sites inside of the THA, as drifters would be able to exclusively fish a 10 fathom area on both sides of all setnet sites 50 fathoms apart. This would have devastating consequences on our catch during build ups.

Another major point that should be made is that the build ups in the Main Bay Subdistrict are by no means exclusive to the shoreline. It is quite often that the majority of the harvest takes place off the beach in waters that are not accessible to the setnet fleet. In addition, when the Main Bay Hatchery AGZ is open to the set gillnet gear group, the drift fleet has nearly full access to all the beach sites within the THA as almost all setnet gear is deployed in the AGZ. Under these circumstances, the drift fleet is able to efficiently harvest these build ups with our legally anchored lines and buoys in place (5AAC 39.105 (d) (2)).

In response to the escalated gear conflict that would result from this proposed change in regulation, we strongly recommend increasing the current legal distance between set and drift gear from 25 fathoms to 30 fathoms within the Main Bay Subdistrict. This would eliminate the majority of conflict that takes place during build up openers in Main Bay and would provide law enforcement clarity to efficiently regulate these high conflict build up openers. Our suggested change in regulation would be consistent with the remainder of the district. In 1996, the Board of Fish took action to increase the distance between



setnet and drift gear in the Crafton Island Subdistrict from 50 fathoms to 60 fathoms, while the required distance between setnets remained at 100 fathoms (5AAC 24.335). Prior to this change, drifters were attempting to fish a perfect line between setnets 100 fathoms apart. Board of Fish took action to eliminate this ambiguity in regulation and reduce the gear conflict in the Crafton Island Subdistrict. We hope you consider following the precedent and increase the required distance between setnets and drift nets from 25 fathoms to 30 fathoms in the Main Bay Subdistrict.

CDFU also requests that no set gillnet may exceed 50 fathoms in length in the Main Bay Subdistrict. We strongly oppose this as it would be extremely allocative and is solely intended to reduce the harvest levels of setnet permit holders. Contrary to CDFU's original request in this proposal, the removal of all 100 fathom setnets in the Main Bay Subdistrict would force setnet permit holders to occupy more beach area by staking out two sites for 50 fathom nets, therefore reducing the available beach access for drifters.

Proposal 43: Oppose. Proposal 43 states that a drift operation should not be deemed illegal upon deployment of a set gillnet, and the drift operation must have time to retrieve its gear and/or navigate to legal waters after the setnet has been deployed. This request for additional regulation is unnecessary, unenforceable, and would provide freedom for the drift operation to take as long as they wanted to retrieve their gear from the illegal waters after the setnet gear had been deployed.

The author of this proposal states 'The Board of Fisheries intentions to maintain access (to the Main Bay Sockeye build ups) for the drift fleet has been slowly eroded as enforcement does not focus efforts to keep setnet crews from operating and deploying gear during openers.' First of all, the clause about preventing setnet crews from operating and deploying gear during openers is a completely separate issue that is addressed in Proposal 44. Despite this, I would like to clarify that current law allows setnet crews to operate and deploy gear (see 5AAC 39.107d). They mention how their access to Main Bay build ups has been slowly eroding away. Just to be clear, the build ups in Main Bay are not strictly confined to the beach sites. Often the fish are off the beach in deeper water on the build up openers and as setnetters we cannot access these fish with our stationary gear. The drift fleet has exclusive access to the waters beyond our offshore buoys, in addition to all the beach access in Main Bay that is a legal distance from deployed setnet gear.

When we enter this fishery, either as setnetters or drifters, we understand the attached pros and cons of each gear type. As setnet permit holders, we understand that we are limited by our stationary gear, but we also see the benefit of potentially obtaining protected beach access. In fact, the majority of the active sites within the Main Bay Terminal Harvest Area are leased through the Alaska Shore Fisheries Lease Program by setnet permit holders. These leases provide us with first priority to the corresponding shore fishery sites. We cannot move offshore or to another district when the fishing is poor at our beach sites, as drifters have the ability to do at any time.



The author of Proposal 43 mentions that 'a drift operation must be able to retrieve its gear if it is deployed before a set net is deployed.' The setnet gear group does not prevent the drift fleet from retrieving their gear. Once we have our gear in the water, it is the responsibility of the drift gear operator to promptly pick up their gear and relocate to legal waters. On opening sets in Main Bay when gear is simultaneously deployed, as soon as a setnet is in the water there shall be no drift gear within 25 fathoms of the setnet gear, except in the zone outside the offshore buoy of the set gillnet.

If Proposal 43 were to pass, it would allow drift gillnet operators to become setnetters with 150 fathoms of gear laid out on the beach. It would be up to the fishermen to decide when they had to move to legal waters. It would be a burden on law enforcement to attempt to enforce this proposal. This proposal would allow both set and drift gear to be deployed concurrently in waters that would by law be illegal to the drift operator.

We ask that you not approve Proposal 43, as it would dramatically increase gear conflict, it is unenforceable, and it would jeopardize the safety of all users.

Proposal 44: Oppose. Proposal 44 proposes that the operation of each set gillnet and drift gillnet must be performed or assisted by a Commercial Fisheries Entry Commission permit holder in the Prince William Sound Area commercial salmon fishery. This proposal is invalid, as 5 AAC 24.331 (b)(3) is already enforced as intended in the current regulations. For stationary gear, the definition of fishing site and an explanation of performing or assisting is provided in 5 AAC 39.107 (d).

The proposal states that there is a 'lack of enforcement of Section G that requires a permit holder to be present to perform or assist.' This statement is inaccurate. Under current regulations, setnet permit holders are considered present as long as they are present at the specific fishing sites, traveling to and from other gear, traveling to deliver fish, or in any structure used for shelter in the support of the operation of net gear or other stationary gear. Under all of these circumstances, the setnet permit holder is performing or assisting the operation of the setnet gear.

The author of Proposal 44 also suggests that setnet crew members are illegally setting nets and working the gear. This again is inaccurate. Under current law, setnet crew members are allowed to set nets and work the gear, as long as the permit holder is performing or assisting in any of the ways defined in 5 AAC 39.107 (d). These regulations for stationary gear are consistent and enforced as intended in all commercial setnet fisheries across the state.

Regardless of the current regulations, Proposal 44 intends to restrict the setnet operations to set and work all gear out of one boat with the current permit holder present in that skiff. This idea is both extremely allocative and significantly jeopardizes the safety of the setnet fleet. Restricting us to operate out of one skiff and no longer allowing crew members to set and work gear would force us to unsafely travel with 150 fathoms of gear in our skiff. Setting and pulling gear would also be much more dangerous and time consuming with all 150 fathoms of gear in one boat. This proposal



is extremely allocative, as we would be limited to only deploy 50 or 100 fathoms of stationary gear on the opening set, while drifters would be allowed to set and manipulate a full 150 fathoms. During build ups within the Main Bay Terminal Harvest Area, this proposal would deny setnet permit holders two thirds of their beach access. By the time our first 50 fathom net was set, our other beach sites would already be occupied by multiple drift gillnetters, making it impossible to deploy our second and third nets. As a result, this would also drastically increase gear conflict.

We ask you to not approve Proposal 44, as the current regulations are clearly defined and enforced as intended, and the author of the proposal is requesting regulation changes that would have significant effects on allocation, gear conflict, and the safety of all participants.

Proposal 45: Oppose. The suggested regulation change to limit setnet permit holders to only four setnet sites deployed with lines and buoys is unnecessary, unprecedented, and significantly jeopardizes the safety of setnet operators.

CDFU falsely states that there has been a marked increase in unused set net sites throughout the Eshamy District that preclude the drift fleet from historic beach area. Since the start of this fishery in 1983, the number of setnet permits has remained the same and users have historically had multiple sets of anchors, lines, and buoys deployed throughout the district to ensure the flexibility to fish regardless of the opener and weather. There has been a misconception over the last two seasons that there are more unused setnet sites throughout the district, but this is directly related to the frequent openers that restricted us all to the Main Bay Subdistrict and concentrated the number of setnet sites marked with lines and buoys. With all of our lines and buoys in place, the drift fleet was still able to efficiently harvest the build ups. Specifically when the AGZ was open to setnetters and nearly all users had their setnets deployed in the AGZ, the drift fleet was able to effectively harvest the build ups with all of our lines and buoys in place.

CDFU claims that the beach access is historically tied to the drift fleet. This is so far from the truth. Historically, since the inception of this fishery, setnetters have been given priority access to these beach sites, and it is understood that many of these beach sites are registered lease sites with the Alaska State Division of Lands Shore Fishery Lease Program.

Across the State of Alaska, there is no other setnet district with regulation that limits the number of anchored or staked setnet sets allowed per permit holder for operation. This proposal has been submitted in similar fashion in multiple BOF meetings in the past, and repeatedly has been shot down due to safety and gear conflict concerns.

In order to relocate during openers and to have the flexibility to fish all openers, it is essential that we have our lines and buoys in place at all times. Under poor weather conditions, it would be unsafe for us to be raising and lowering sets to be able to fish the upcoming opener. In the case of emergency announcements, we must have multiple sets to give us options to be able to fish under the current management.



Without our raised lines and buoys in place, a drift vessel would be able to fish over the top of our sunken sets. If we needed to relocate to this staked beach site, enforcement would be put in the hands of the setnet fishermen to request the drift vessel to remove his or her gear in order for us to raise our set. The drift permit holder would then determine when it was in his or her best interest to pick up their gear and relocate to open waters, while we would be wasting valuable fishing time with our net out of the water.

Historically, drifters have been able to efficiently harvest their catch with our raised lines and buoys in place. This proposal is only directed to jeopardize the harvest levels and efficiency of the setnet permit holders, while seeking an advantage for the drift fleet. There is no regulation change necessary in response to this proposal.

Proposal 48: Oppose. We request returning this fishery to a cost recovery fishery as it was intended. Against the goals of the current allocation plan, the seine fleet has been able to target and harvest threatened Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye (5AAC 24.370). Other districts in the Sound have been strictly managed due to the shortfall of these stocks, while the seine fleet has been able to intercept these wild and allocated sockeye. This chum fishery is out of regulation and should remain closed, including the THA and SHA, prior to July 18th to protect the Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye.

Proposal 49: Support Option 1. We request returning this fishery to a cost recovery fishery as it was intended. Against the goals of the current allocation plan, the seine fleet has been able to target and harvest threatened Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye (5AAC 24.370). Other districts in the Sound have been strictly managed due to the shortfall of these stocks, while the seine fleet has been able to intercept these wild and allocated sockeye. This common property chum fishery is out of regulation and should remain closed, including the THA and SHA, prior to July 18th to protect the Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye.



exception to legal methods for subsistence fishing is rod and reel. Because they are used to being allowed to harvest hundreds of fish throughout the year by all other methods it should not be remarkable that they may not even think about it the very few times they may harvest fish with rod and reel. However, some of them have been subject to law enforcement actions over the years due to their lack of a license.

A similar allowance is provided on the northern Seward Peninsula.

PROPOSED BY: Kotzebue Sound Fish and Game Advisory Committee (EF-C15-028)

PROPOSAL 142 – 5 AAC 01.220. Lawful gear and gear specifications. Change the dates gillnet gear may be used in the South Fork and Middle Fork of the Koyukuk River from November 1 through June 30 to August 20 through June 30, as follows:

5 AAC 01.220(f)(8) is amended to read:

Gillnets three and one-half inches, (current size restriction), may be used only from August 20–June 30.

What is the issue you would like the board to address and why? Change the open period for when subsistence gillnet may be used in the Middle and South Fork permit area, from the current November 1 to June 30 season, to August 20 to June 30. This proposal would still protect salmon when present but allow fall harvest of whitefish, grayling, suckers, and pike. I collected salmon samples under ADF&G Commissioner's permit from 2010 to 2013, for the Genetic Conservation Lab. I found only summer chum and Chinook salmon present in the upper Koyukuk drainages from July 15 to August 15. I found no fall chum or coho in the Middle or South fork drainage.

PROPOSED BY: Jack Reakoff (EF-C15-029)

(OKK. PROPOSAL)

PROPOSAL 143 – 5 AAC 01.244. Minto Flats Northern Pike Management Plan. Reduce the bag and possession limit of northern pike in the Minto Flats Northern Pike Management Plan, as follows:

Amend 5 AAC 01.244(b)(2)(B) Minto Flats Northern Pike Management Plan to read:

(B) there is no daily or annual bag limit, except that in the area described in (G) of this paragraph, the bag limit is 5 [10] fish and the possession limit is 5 [20] fish and any fish that exceeds 30" will be handled carefully and immediately returned to the river.

What is the issue you would like the board to address and why? My concern is with the reduced population of pike in Minto Lakes as evidenced by the poor results of summer bait and fly fishing. I'm especially aware of the slow decline over the past 15 years. As a cabin owner and constant visitor to Minto for over 50 years, it's obvious to me that there

Submitted by Reed Monstey



is an issue. I believe that the main issue is the subsistence fishery in the Chatanika Special Harvest Area (SHA) that is really a glorified sports fishery that occurs during the winter. After the lakes freeze, the pike migrate to the confluence of Goldstream and the Chatanika. Due to this concentration, the fishing is easy and the fish plentiful. Fishermen are high-grading and taking the larger, female pike and that has a large consequence on the overall population of pike in the system. Of the 80 permits that were issued in 2014/15, 300 pike were reported as taken. Since most of these were large pike, those were mostly female spawners. The average catch for the past 15 years, as reported, exceeds 500 fish per year -that's a minimum of 7,500 large fish gone, which increases significantly when you consider that many of these are the spawning females.

Minto used to be a wonderful fishing experience for the hundreds of people from the Fairbanks North Star Borough who fly or boat into the Lakes each summer. Now, 80 people (permit holders) are allowed to effectively destroy the largest pike fishery in the United States. That's not right or o.k. If thru-the-ice fishing isn't reduced, the population will continue to decline from the low it is now, and it will be very difficult to recover based on the fact that it takes 15 to 20 years to grow a large pike.

My ideal solution would be to close the winter pike fishery down in the Chatanika SHA for 10 to 15 years. I understand that you cannot close subsistence fishing without also closing sport fishing, so at a minimum I would like to see the bag limit and possession limit the same as sport fishing and size restrictions in place to help protect the larger females.

PROPOSED BY: Marv Hassebroek

(HQ-F15-086)

PROPOSAL 144 - 5 AAC 01.220. Lawful gear and gear specification. Allow the use of five and one-half inch mesh gillnets across an entire channel in portions of the Koyukuk River for the purpose of targeting northern pike, as follows:

We would like to be able to continue to fish the way we once did, and be able to put a gill net across the entire channel of some waterways. There is a current season that allows us to use smaller mesh nets in the drainage, but we would like to be able to use larger mesh to target larger pike as the smaller mesh does not allow us to effectively catch the larger pike. We would like to do this in the spring when pike are moving out of the lakes and into the rivers.

We would like to be able to use up to a 5 ½ in. mesh until June 15 in Racetrack Slough off of the Koyukuk River as well as sloughs attached to the Huslia River. We would like to be able to use the larger mesh sizes across the entire slough. Since the intent of this is to target larger fish, the idea behind using the larger sized mesh is to allow the smaller whitefish to pass through the net unmolested.

What is the issue you would like the board to address and why? There are too many pike in parts of the Koyukuk River drainage. Pike are excellent predators and this is leading to a potential decrease in salmon smolt survival, as well as less small mammals and waterfowl.

(STAFF COMMENTS)



PROPOSAL 143 – 5 AAC 01.244. Minto Flats Northern Pike Management Plan.

PROPOSED BY: Marv Hassebroek.

WHAT WOULD THE PROPOSALS DO? This would reduce the subsistence bag and possession limit of northern pike in the Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to the Fairbanks Nonsubsistence Area Boundary (referred to as Chatanika SHA by proponent) from 10 fish per day and 20 in possession, to five fish per day and five in possession. Additionally, all northern pike 30 inches or longer would have to be returned to the water alive.

WHAT ARE THE CURRENT REGULATIONS? The subsistence fishing bag limit is 10 northern pike per day, with 20 in possession in the Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to the Fairbanks Nonsubsistence Area Boundary. There is no size limit on northern pike retained in the subsistence fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Subsistence fishing bag and possession limits for northern pike would mirror the sport fish regulations found in 5 AAC 74.044 (b)(2)(B). This would also require subsistence fishermen to release northern pike over 30 inches long, which is more restrictive than the sport fishing regulations in 5 AAC 74.044 (b)(2)(B). The harvest of northern pike may decrease a small amount.

BACKGROUND: The Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to the Fairbanks Nonsubsistence Area Boundary (Figure 143-1) is a popular northern pike subsistence fishing area due to the concentration of an overwintering population and good winter trail access. In 2010, the board established a subsistence bag limit of 10 northern pike per day, with 20 in possession for this portion of the Chatanika River. This area is open to sport fishing from June 1 to October 14, and the sport fish bag and possession limit is five fish per day, only 1 of which may be 30 inches or longer.

The Minto Flats northern pike subsistence and sport fisheries are managed in accordance with the *Minto Flats Northern Pike Management plans* (5 AAC 01.244 and 5 AAC 74.044). The purposes of the plans are to manage stocks consistent with sustained yield principles, provide a reasonable opportunity for the priority subsistence fishery, and provide a sport fishing opportunity. Under the management plan, the exploitation rate of northern pike by all users may not exceed 20% annually. If 750 or more northern pike are harvested from the Chatanika River drainage upstream of the confluence on the Chatanika River and Goldstream Creek after January 1, the sport fishery bag and possession limit will be reduced to two fish for the remainder of the calendar year. If 1,500 or more northern pike are harvested from this portion of the Chatanika River drainage after January 1 until these waters are free of ice, the winter fishery will be



closed for the remainder of the winter season. The majority of the subsistence harvest occurs in mid-February to mid-April.

The most recent population estimate of 16,045 northern pike over 16 inches long in Minto Flats was made in 2008. Based on this estimate, a 20% exploitation rate is equal to a harvest of 3,209 northern pike. The recent 5-year average annual combined subsistence and sport harvest of northern pike was 774 fish (Table 143-1), which is below the maximum 20% exploitation rate specified in the *Minto Flats Northern Pike Management Plan*. Since 2010, when the bag and possession limit was implemented in the Chatanika River drainage upstream of the confluence on the Chatanika River and Goldstream Creek, the subsistence northern pike harvest has not met or exceeded the 750 or 1,500 fish management action trigger points. Therefore, the current subsistence harvest levels and exploitation rate are consistent with the sustained yield principles in the management plan.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. However, current regulations are maintaining the harvests at a sustainable level and there is no need to further restrict subsistence users. While the proposed harvest bag and possession changes would mirror current sport fishing regulations, the size limit would be more restrictive than sport fishing regulations. The board should consider whether adoption of this proposal still provides a meaningful priority for subsistence fishing, and a reasonable opportunity for success in taking northern pike for subsistence uses.

COST ANALYSIS: Approval of this proposal may result in additional direct costs for a private person to participate in the subsistence fishery if multiple trips are required to harvest similar amounts of pike for subsistence uses.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? Yes, these northern pike stocks likely migrate through the Fairbanks Nonsubsistence Area (5 AAC 99.015(a)(4)).
2. Is the stock customarily and traditionally taken or used for subsistence? Yes: the board determined that freshwater fish species, including sheefish, whitefishes, lamprey, burbot, sucker, Arctic grayling, northern pike, and chars are associated with customary and traditional uses in the Yukon Area (5 AAC 01.236(a)(2)).
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? While not in regulation, in 1997, the board found that 133,000 – 2,850,000 pounds of freshwater fishes was the amount reasonably necessary for subsistence uses in the Yukon Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

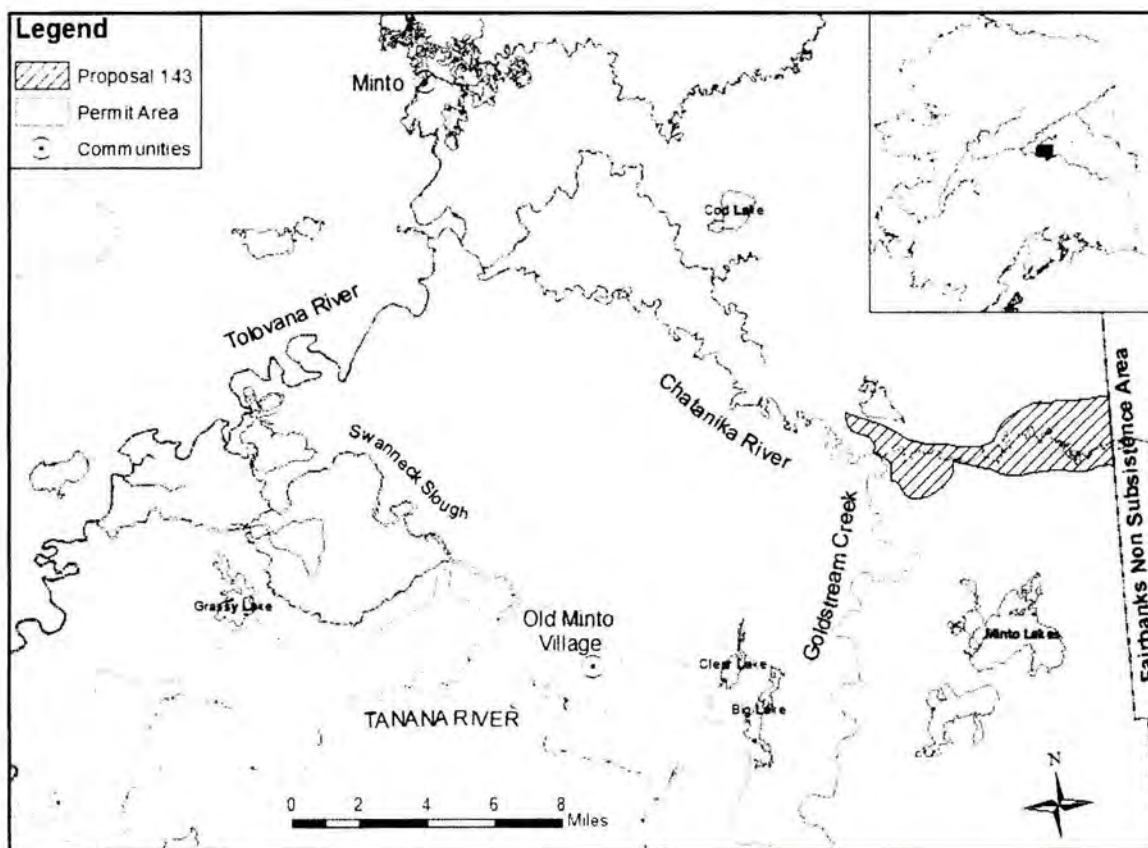


Figure 143-1.—Minto Flats northern pike subsistence fishing area.

Table 143-1.—Subsistence and sport fishing harvest of northern pike in Minto Flats complex^a, 2004–2015.

Year	Permits Issued	%Permits Returned	Subsistence Harvest	Sport Harvest	Total Harvest
2005	79	87%	386	2,052	2,438
2006	101	96%	788	1,204	1,992
2007	118	92%	1,837	1,809	3,646
2008	146	93%	1,339	386	1,725
2009	112	96%	563	873	1,436
2010	96	94%	115	609	724
2011	70	99%	100	422	522
2012	73	93%	525	412	937
2013	77	96%	231	382	613
2014	106	99%	478	597	1,075
2015 ^b	104	13%	383	ND	383
Total	1,756	ND	14,325	12,070	26,395
2010–2014 Average	84	96%	290	484	774
2005–2014 Average	98	95%	636	875	1,511

Note: ND = no data.

^a Minto Flats complex includes Minto Flats lakes and flowing waters, Tolovana River drainage, and the Lower Chatanika River.

^b Data are preliminary and based on weekly call-ins. Permits expire 12/31/2015.



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SUBSISTENCE FINFISH FISHERY

5 AAC 01.245

(4) all finfish other than salmon and herring, in the salt waters of the Yukon Area.

(b) The board finds that in the Yukon Area the following amounts of fish are reasonably necessary for subsistence uses:

- (1) king salmon: 45,500 — 66,704;
- (2) summer chum salmon: 83,500 — 142,192;
- (3) fall chum salmon: 89,500 — 167,900;
- (4) coho salmon: 20,500 — 51,980;
- (5) pink salmon: 2,100 — 9,700. (Eff. 5/15/93, Register 126; am 6/10/98, Register 146; am 6/17/2001, Register 158; am 5/19/2004, Register 170; am 7/13/2012, Register 203; am 4/13/2013, Register 206)

Authority: AS 16.05.251

AS 16.05.258

5 AAC 01.240. Marking and use of subsistence-taken salmon. (a) Repealed 8/14/87.

(b) Repealed 6/10/98.

(c) In Districts 1 — 3, from June 1 through July 1 a person may not possess king salmon taken for subsistence uses unless both tips (lobes) of the tail have been removed before the person conceals the salmon from plain view or transfers the salmon from the fishing site. A person may not sell or purchase salmon from which both tips (lobes) of the tail fin have been removed.

(d) In the Yukon River drainage, king salmon must be used primarily for human consumption and may not be targeted for dog food. Dried king salmon may not be used for dog food throughout the Yukon River drainage, except that whole fish that are unfit for human consumption, scraps, and fish under 16 inches in length may be fed to dogs. Whole king salmon caught incidentally during a subsistence salmon fishery in the following time periods and locations may also be fed to dogs:

- (1) after July 10, in the Koyukuk River drainage;
- (2) after July 20, in District 6 and the Tanana River drainage;
- (3) after August 10, in Subdistrict 5-D, upstream of Circle City. (In effect before 1986; am 4/18/86, Register 98; am 8/14/87, Register 103; am/readopt 5/15/93, Register 126; am 6/10/98, Register 146; am 7/21/99, Register 151; am 5/17/2001, Register 158; am 5/29/2001 — 9/25/2001, Register 158; am 8/24/2002, Register 163; am 6/7/2007, Register 182)

Authority: AS 16.05.251

AS 16.05.258

Editor's note: At its February 23 — 27, 1993 meeting, the Board of Fisheries readopted 5 AAC 01.240(b) in its entirety without change, under ch. 1, SSSLA 1992 (the 1992 subsistence law), which was repealed and reenacted AS 16.05.258.

5 AAC 01.244. Minto Flats Northern Pike Management Plan. (a) Northern pike stocks in the lakes and flowing waters of the Minto Flats

support both subsistence and sport fisheries. The purpose of this management plan is to provide the department with guidance to achieve the goals of managing these stocks consistent with sustained yield principles, providing a reasonable opportunity for the priority subsistence fishery, and providing a sport fishing opportunity. The Minto Flats northern pike management plan for the sport fishery is set out in 5 AAC 74.044.

(b) The department shall manage the Minto Flats northern pike subsistence fishery as follows:

(1) the maximum exploitation rate of northern pike in the lakes and flowing waters of the Minto Flats by all users may not exceed 20 percent annually;

(2) the following provisions apply to the harvest of northern pike in the Minto Flats area subsistence fishery:

(A) the open fishing season is from January 1 through December 31;

(B) there is no daily or annual bag limit, except that in the area described in (G) of this paragraph, the bag limit is 10 fish, and the possession limit is 20 fish;

(C) a person must obtain an ADF&G subsistence harvest permit before participating in the subsistence fishery and must have that permit in possession when participating in the fishery;

(D) gillnets may be used only from April 15 through October 14;

(E) a hook and line attached to a rod or pole may be used only when fishing through the ice;

(F) in the Chatanika River drainage, from the confluence of the Chatanika River and Goldstream Creek to an ADF&G regulatory marker approximately three river miles upstream of the confluence, subsistence fishing through the ice is closed;

(G) in the Chatanika River drainage, from an ADF&G regulatory marker approximately three river miles upstream of the confluence of the Chatanika River and Goldstream Creek to an ADF&G regulatory marker at the boundary of the Fairbanks Nonsubsistence Area (approximately one mile downstream from Murphy Dome Road).

(i) only single hooks may be used; and

(ii) if the subsistence harvest reports indicate that 1,500 or more northern pike have been harvested during the period from January 1 until these waters are free of ice, the commissioner shall close, by emergency order, these waters to fishing for northern pike through the ice. (Eff. 5/9/98, Register 146; am 6/17/2001, Register 158; am 3/14/2009, Register 189; am 5/19/2010, Register 194; am 5/22/2016, Register 218)

Authority: AS 16.05.060
AS 16.05.251

AS 16.05.258

5 AAC 01.245. Restrictions on commercial fishermen. (a) Repealed 6/10/98.

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KENAI SOCIETY



TANANA RIVER AREA

5 AAC 74.055

- (C) allowing single-hook, artificial lures only or no bait, or both;
- (D) allowing catch-and-release fishing only;
- (E) a complete closure of the fishery.

(d) Special management waters are waters designated by regulation of the Board of Fisheries, where harvests are within sustained yield levels and where the management objectives include higher stock abundance or a need for a higher percentage of trophy-sized fish. Within special management areas, if the department determines that management objectives will not be met under existing regulatory provisions, the commissioner may, by emergency order, close the fishery and immediately reopen a fishery during which one or more of the following management measures apply:

- (1) reduced fishing season;
- (2) special gear restrictions;
- (3) alternative size limits;
- (4) catch-and-release fishing only.

(e) The department shall minimize potential conflicts with a subsistence fishery, or other fisheries that overlap the sport fishery, that harvest other fish within the same body of water. (Eff. 3/14/2009, Register 189)

Authority: AS 16.05.060

AS 16.05.251

5 AAC 74.044. Minto Flats Northern Pike Management Plan. (a) Northern pike stocks in the lakes and flowing waters of the Minto Flats support both subsistence and sport fisheries. The purpose of this management plan is to provide the department with guidance to achieve the goals of managing these stocks consistent with sustained yield principles, providing a reasonable opportunity for the priority subsistence fishery, and providing a sport fishing opportunity. The Minto Flats northern pike management plan for the subsistence fishery is set out in 5 AAC 01.244.

(b) The department shall manage the Minto Flats northern pike sport fishery as follows:

(1) the maximum exploitation rate of northern pike in the lakes and flowing waters of the Minto Flats by all users may not exceed 20 percent annually;

(2) the following provisions apply to the harvest of northern pike in the Minto Flats area sport fishery:

(A) the open fishing season is from June 1 through October 14;

(B) the daily bag and possession limit is five fish per day, only one of which may be 30 inches or more in length;

(C) if the subsistence harvest reports indicate that 750 or more northern pike have been harvested from the Chatanika River drainage upstream of the confluence of the Chatanika River and Goldstream Creek during the period from January 1 until these waters are free of ice, the commissioner shall reduce, by emer-

gency order, the daily bag and possession limit to two fish per day, only one of which may be 30 inches or more in length, in the lakes and all flowing waters of the Minto Flats area for the remainder of the calendar year; and

(D) in the Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to an ADF&G regulatory marker located at the boundary of the Fairbanks Nonsubsistence Area (approximately one mile downstream from the Murphy Dome Road), only single hooks may be used. (Eff. 3/14/2009, Register 189; am 5/19/2010, Register 194)

Authority: AS 16.05.060

AS 16.05.251

5 AAC 74.055. Tanana River Area Wild Arctic Grayling Management Plan. (a) By employing a conservative harvest regime, the department shall manage wild Arctic grayling populations in the Tanana River Area for long-term sustained yield. Following sustained yield principles, the department may manage wild Arctic grayling fisheries to provide or maintain fish qualities that are desired by sport anglers.

(b) In a sport fishery covered by this management plan, the commissioner, by emergency order, may take one or more of the management actions specified in this subsection if there are conservation or biological concerns for the sustainability of the fishery or for a stock harvested by that fishery. The concerns must arise from harvest, effort, or catch data for that fishery which has been derived from statewide harvest survey data, on-site creel survey data, stock status data, stock exploitation rates, or from inferential comparisons with other fisheries. The management actions are as follows:

- (1) reduce the bag and possession limits;
- (2) reduce fishing time;
- (3) allowing only catch-and-release fishing;
- (4) modify methods and means of harvest.

(c) To achieve sustained yield and provide diverse fishing opportunities, the board and department will manage wild Arctic grayling fisheries under one of three management approaches. The three management approaches are the

- (1) regional management approach;
- (2) conservative management approach; and
- (3) special management approach.

(d) Regional management approach. Under the regional management approach, sport anglers may use baited or unbaited artificial lures and the bag and possession limit is five fish. The season is open year round, however there are fisheries where catch-and-release is imposed during part or all of the spawning period from April 1 through May 31.

(e) Conservative management approach. Under the conservative management approach, sport anglers may use baited or unbaited single-hook artificial lures. The bag and possession limit is two fish.



Submitted By

Richard Heller

Submitted On

11/15/2017 2:52:34 PM

Affiliation

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Other than this past year, I have fished from a boat on the Copper River the last 5 or 6 years. It's a resource that I hope you don't take away from me. I'm a disabled veteran and am limited to what I can do. This is how I fill my freezer for the year. Please don't take this away from me. The numbers are cyclic, but I would ask you lower the commercial quotas instead. We don't make money on what we catch, they do. We live off of the fish. Thank you for your consideration, Richard Heller



Submitted By
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Submitted On
11/13/2017 9:48:42 PM
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I am in favor of Proposal 10. An Optimum Escape Goal for each species of interest makes sense. That way each species could be managed independently.

I support Proposal 17. Increasing the distance on the Copper River open to PU dipnetting would decrease crowding with changing the allowed harvest.

I also support Proposal 18. Basing the dipnetting openings on actual fish counts by sonar makes good management sense, basing the entire season allotment on the size of the early return does not allow for an increase catch if the return surges later.

I oppose Proposals numbered 13, 15, 16, 28, and 36.



Submitted By
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11/11/2017 7:07:04 PM
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Proposal # 10 Support Better management result ..

Proposal #13 Oppose Political

Proposal # 15 Oppose Political

Proposal # 16 Oppose Political

Proposal # 17 Support Results in better management

Proposal # 18 Support Results in better management

Proposal # 28 Oppose Political

Proposal # 36 Oppose Political



Submitted By
Russell Lewis
Submitted On
11/15/2017 4:19:15 PM
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With regard to the following proposals, I offer the associated comments:

Proposal 10 (escapement goal): I support this proposal as it appears to be sound rationale and would benefit the fish population as well as providing some rigor on the related management approach.

Proposal 12 (Gear / Live box): I support this proposal as it would ultimately preserve more of the resource (Kings)

Proposal 13 (Prohibit use of boat for dipnetting): I oppose this proposal. The cited justification does not withstand logic: it is asserted that a rapid catchment of a given limit does not allow escapement. Unless all the run will be in the river on one day, this is not logical: If a limit is caught in one day, that fisherman or group will simply not be on the water the next day or the next opening. This proposal appears to be targeted against a particular operator and group of users to favor another group.

Proposal 14 (delayed opening of subsistence / kings): I oppose this proposal. While recognizing the impact of low returns, it appears this proposal is impacting all user groups except commercial fisheries. The preservation of stocks can be accomplished without this proposal by either emergency order or by limiting the commercial harvest.

Proposal 15 (monofilament / gill nets): I oppose this proposal. Weighing possible benefits to drawbacks indicates that the impact on lawful uses far outweighs the effectiveness of this measure. While it is undoubtedly stressful to a fish to be released from a gill net; particularly for kings release from a dip net (of whatever sort) is not going to happen "on the fly" and will likely require substantial work by the fisherman (and attendant stress on the fish) regardless of the type of net. To protect the king stocks, limit the commercial harvest. Most personal use fishermen actively fish when the king run is not overly intermingled with the sockeye run. This proposal would disproportionately impact those users without any proof of benefit to the kings.

Proposal 16 (Records): I oppose this proposal on both a procedural basis and a more pragmatic basis. Procedurally, this proposal appears to target one particular operator without placing a similar burden on other operators that offer a commercial service that is different in nature if not in impact. I recently moved back to Alaska and undertook a personal use fishery as soon as I was eligible. Working from a charter boat, I caught roughly 1/2 of my limit during a 10 hour day. In years gone by, after being dropped off on shore (by a commercial service), I caught my limit in approximately 6 hours.....both were the same limits. Under the current proposal "I" had the same impact on the fishery, but this proposal forces a substantial amount of recordkeeping on one operator without impacting the other. On a practical basis, unlike other fisheries that have limits in the single digits, the personal use fishery could see as many as 45 fish caught by one person....conceivably during a day's outing. The opportunities for error and miscounting are many and would negate any real or perceived benefit to the resource, particularly when compared to the current system wherein strict liability for proper tracking lies where it should, with the individual. At its root, this appears to be a self-serving proposal by the proponents against one operator.

Proposal 17 (expanded Chitina Personal Use subdistrict): I support this proposal as it does not increase the burden on the resource but only allows better use of the available resource by residents.

Proposal 18 (harvest level reduction): I support this proposal. As outlined in the issue statement, the ability to manage harvest / escapement is present without the need to shutdown (or severely limit) an entire fishery for what might be a temporary aberration.

Proposal 23 (Catch and release): I oppose this proposal. It is unclear if the proponents thought through what this would mean or if they intended to propose shutting down an entire region, but that is precisely what the proposal would accomplish. No fishing method (traditional or not, intentional or not) can be certain of not having any unwanted or unintended bycatch. Not allowing catch-and-release would be the same as simply banning fishing.

Proposal 28 (Mandatory closures / mandatory king closures): I support this proposal in part. If an approved plan exists, the proper venue for regulation / management is through the creation of that plan. However, the part of the proposal that reads "Repeal mandatory inside commercial closuresfrom regulation" is too broad. Nothing should be exempt from regulation; instead, regulatory language should be drafted as precisely or as broadly as needed.

Proposal 36 (extended openers): I oppose this proposal. The proponents seem to be making an economic argument along the lines that there has historically been good escapement and more openers are needed to support local economy. However, as seen by the plethora of proposed regulations (whatever the merits of any given regulation), it is clear that not every stakeholder considers the fishery to be

unequivocally healthy. The greatest impact on this fishery is the commercial harvest. Mandating an opening schedule would expose the fishery to its greatest risk of overuse.





#	Proposal	Position	Comments
10	<p>Set an Optimal Escapement Goal for Copper River sockeye salmon of 700,00-1,200,00 to match late run Kenai sockeye OEG...</p> <p><i>Fairbanks Fish and Game Advisory Committee (FBX F&G AC)</i></p>	OPPOSE	<p>The proposed OEG is unnecessary for sockeye in the Upper Copper River.</p> <p>The current SEG was established in 2011 and increased the upper end of sockeye spawning escapement from 500,000 to 750,000.</p> <p>Current information on Klutina lake productivity indicates the SEG is more than adequate and possibly promotes over escapement, which in turn reduces opportunity for all users over time.</p>
13	<p>Prohibit using a dipnet from a boat to harvest salmon in the Glennallen Subdistrict ...</p> <p><i>Ahtna Tene' Customary and Traditional Use Committee</i></p>	SUPPORT	<p>The ability of a new commercial entrant to classify him/herself as a water taxi/sightseeing operation and advertise and operate as a guide for folks to dipnet a subsistence take of salmon is a perversion.</p> <p>This reallocation to new commercial users serves to pit user groups against each other as the newer commercial operations foment dissent when actually all user groups on the Copper River have benefitted from the stabilizing and run growing effects of abundance based management and limited entry on commercial fisheries.</p>
14	<p>Modify the season dates for the Glennallen Subdistrict subsistence salmon fishery based on the preseason king salmon harvest projection:</p> <p><i>Wrangell-St Elias National Park Service Subsistence Resource Commission</i></p>	OPPOSE	<p>Understanding the author's intent to provide an additional management tool it is unwise to attach regulation to a preseason forecast.</p>
15	<p>Prohibit use of monofilament or gillnet mesh in dipnets...</p> <p><i>Wrangell-St Elias National Park Service Subsistence Resource Commission</i></p>	SUPPORT	<p>It is time to look at the "improvements" made to dipnet gear over time and make a rational decision on what constitutes a dipnet. This fishery has changed rapidly over the years and the Board should help guide its direction away from the boat driven trawl fishery it is becoming.</p>
16	<p>Require logbooks for all charters operating in PU and Subsistence fisheries...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The commercial fisheries are required to provide timely and accurate harvest reporting at the end of each fishing period. With the available technology it is reasonable to expect upriver fisheries and especially those engaging in commercial activities also be required to adhere to some in season harvest-reporting standard.</p>
17	<p>Extend the lower boundary of the Chitina Subdistrict downstream to the Umanatna River...</p> <p><i>Chitina Dipnetters Assoc,</i></p>	OPPOSE	<p>It is amazing the same group that is constantly crying conservation now wants to double their own harvest area. This expansion will further disenfranchise the traditional shore based PU participant for the newer boat driven trawl fishery.</p>



#	Proposal	Position	Comments
18	Repeal the reduction in maximum harvest level in the Chitina Subdistrict Personal Use fishery when the Copper River commercial fishery is closed 13 or more consecutive days... <i>Chitina Dipnetters Assoc. & FBX F&G AC</i>	OPPOSE	This intent of this regulation is to ensure all gear groups share the burden of conservation in times of severely weak salmon returns.
19	Allow salmon to be taken for subsistence purposes at any time between May 1 and November 30 in the Copper River District... <i>John C. Wissel, Native Village of Eyak</i>	OPPOSE	Oppose as written until BOF addresses commercial entity's ability to charter subsistence users upriver and down.
28	Repeal mandatory inside waters commercial salmon fishery closures in the Copper River King Salmon Management Plan... <i>Cordova District Fishermen United</i>	SUPPORT	Mandatory inside closures tie ADFG hands even when run timing, river condition and run strength warrant additional opportunity.
29	Extend inside closure area to ¼ mile off the southern shores of all barrier islands in the Copper River commercial drift gillnet salmon fishery... <i>FBX F&G AC</i>	OPPOSE	I would like to save the BOF time and effort by saying I also oppose proposals 31,32,33,34 that were generated from ADFG erroneous preseason announcement of time and area restrictions and closures of Copper River fisheries, which as the commissioner has stated was wrong.
31	Reduce the maximum depth of drift fill nets in the Copper River District commercial drift gillnet salmon fishery to 29 meshes through the start of Statistical week 24 (end of May) <i>FBX F&G AC</i>	OPPOSE	The departure from the management model using actual data from the commercial fishery, sonar counter and on up the river caused these proposals to be written in haste and in response to a scenario that did not happen. I hope the BOF recognizes this and moves forward through this process without getting lost in the what-ifs.
32	Prohibit commercial salmon fishing in the Copper River District, during the month of May, if the preseason forecast for Copper River king salmon is below the 20-year average or 35,000 king salmon... <i>FBX F&G AC</i>	OPPOSE	Abundance based scientific management creates more opportunity over time for all users groups.



#	Proposal	Position	Comments
33	Prohibit sale of commercially caught king salmon in the Copper River District if restrictions on Copper River drainage subsistence fisheries have been implemented... FBX F&G AC	OPPOSE	
34	Prohibit commercial salmon fishing in the Copper River District until a salmon is recorded at the Copper River Sonar... FBX F&G AC	OPPOSE	
38	Modify purse seine gear length in Prince William Sound Area... Rob Nelson	OPPOSE	The seine fleet is more than adequately efficient already. Seines have grown longer with sewn on leads and the newer wedge not being added in to the measurement, while gillnets remain basically the same as when I started fishing 37 years ago. Under the current PWS Enhanced Salmon Allocation Plan the seine fleet is ahead \$50 million dollars over 11 years from 2006-2016 in PWSAC production.
39	Allow permit stacking and increase the amount of purse seine gear that may be operated from a vessel with two limited entry purse seine permit holders onboard in the Prince William Sound Area commercial fishery... Leroy L. Cabana	OPPOSE	The ability for new entrants into the fishery will be curtailed by this proposal.
40	Establish minimum operation depth for drift gillnet gear fished within 90 fathoms of a set gillnet in the Crafton Island Subdistrict... Michael Brown	OPPOSE	When looking at the 10-year harvest average of the set net gear group in PWS Enhanced Salmon Allocation Plan the set gillnet fleet has exceeded their allocation in almost every year since the plan was enacted. No new restrictions on the gillnet fleet are warranted.



#	Proposal	Position	Comments
42	<p>Repeal maximum length for set gillnet gear in the Main Bay Salmon Hatchery Management Plan and prohibit operation of a drift gillnet within 20 fathoms of a set gillnet...</p> <p><i>Cordova District Fishermen United</i></p>	OPPOSE	<p>Substitute Language for to correct typo in Proposal book is as follows: 5AAC 24.367 Main Bay Salmon Hatchery Harvest Plan.</p> <p>(b) In the Main Bay Subdistrict (1) No portion of a drift gillnet may be operated within 20 [25] fathoms of a set gillnet, except in the zone...</p> <p>Justification: This would allow a drift gillnet to operate in between two setnet operations in an area that is currently closed. The setnet gear group has consistently exceeded their allocation and this would regain some historic drift gillnet area that has been ceded to the setnet fleet in the last ten years.</p>
43	<p>Clarify Provisions for operation of drift gillnet and set gillnet gear in the Main Bay Subdistrict...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The BOF and ADFG enforcement have been clear in the intent and ability for the drift gillnet to access build-ups of sockeye, which congregate on the beach. A few newer vocal setnet participants have taken to loudly opposing this given mandate of the BOF. Causing stress and undue focus on the cleanup of hatchery production of which the setnet fleet has consistently exceeded their allocation.</p>
44	<p>Specify that operation of each set gillnet or drift gillnet must be performed or assisted by a Commercial Fisheries Entry Commission (CFEC) permit holder in the Prince William Sound Area commercial salmon fishery...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The BOF should address this in light of newer methods used by the setnet fleet having someone without a valid permit to be laying out gear in a competitive opening without any supervision or the permit holder even in the same bay. It is time to make the rules apply to every commercial operation.</p>
45	<p>Limit each CFEC permit holder to no more than four set gillnet sites deployed with lines and buoys in the Prince William Sound Area commercial set gillnet fishery...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The setnet fleet has cluttered the district with unused lines and buoys. This proposal would bring consistency in amount of lines and buoys dispersed throughout the district and give back access to historic drift gillnet area. Enforcement would also benefit.</p>



#	Proposal	Position	Comments
47	<p>Include the value of all enhanced salmon produced in the Prince William Sound Area in the Prince William Sound Management and Enhanced Allocation Plan...</p> <p><i>Michael Bowen</i></p>	SUPPORT	<p>I believe the BOF needs to create a work group to study and come back with recommendations in 2020 on to address the commercial gear group allocation plan.</p> <p>Currently the seine fleet is \$50 million ahead of the drift gillnet fleet over 11-year period from adoption of the PWS Enhanced Salmon Allocation Plan in 2005. Items to look at include remote release strategies, five year rolling average, COAR value calculation, the inclusion of Silver bay model profits, seine bonuses outside of COAR values which by sheer volume could swing percentages, the setnet trigger, etc are a few items to review and possibly change for industry stability and fairness over time.</p>
48	<p>Allow commercial fishing for salmon in the Armin F, Koernig Hatchery Terminal and Special Harvest Areas prior to July 18...</p> <p><i>Leroy L. Cabana</i></p>	OPPOSE	<p>It is interesting that the wording of the proposal brushes over the intent of the regulation being broken. The department did find that it was illegal for the seine fishery to access this district prior to July 18, but originally said a fishery could be executed by using these fish solely for cost recovery. Then in 2003 the seine fleet was allowed opportunity for directed harvest within the SHA. The SHA was subsequently expanded in area, adding to the illegality and allocative nature of this pre-July 18 seine fishery.</p> <p>I have been to numerous meetings and I support the seine fleet's desire for early opportunity and diversity. A recurrent theme has been that both PWSAC and ADFG say they need direction from the BOF to minimize interception of stocks other than the remote release fish.</p> <p>So I ask the BOF to direct ADFG and PWSAC to minimize interception of all other fish stocks either wild or hatchery in both remote release locations in Prince William Sound.</p> <p>This is ONLY for remote release locations. All other statistical areas no matter which gear group do have some interception of stocks while engaged in their fishery. This is historically accounted for and should be viewed SEPARATELY from remote released stocks, which are intended to not interrupt any historic stock or fishery.</p>
49	<p>Reduce harvest of sockeye salmon in the directed chum salmon fishery prior to July 18 in the Armin F. Koernig Hatchery Terminal and Special Harvest Areas...</p> <p><i>Michael Bowen</i></p>	SUPPORT	<p>Remote release salmon should be harvested with minimum interception of other salmon stocks, either hatchery or natural production, so as not to disrupt historic allocation intent or fishery patterns.</p>



Submitted By
Shirley Moto
Submitted On
11/15/2017 12:55:14 PM
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I fish the Chitna area for Red salmon using dipnet, the fish (whole) is used to sustain our diets during the winter by smoking it, canning both smoked and straight (not smoked); freeze packed and salted to pickle... the Salmon is caught both when season opens, spring and summer/fall... none of the salmon is wasted...



From: Steve Aberle
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Comments on BOF PWS Proposal 40
Date: Friday, November 17, 2017 1:34:39 PM

November 16, 2017

Alaska Board of Fisheries
dfg.bof.comments@alaska.gov

Re: PWS Proposal 40

BOF Members:

I am writing to express strong **OPPOSITION** to Proposal 40 which, if enacted, would require drift gillnets operated in the Crafton Island Subdistrict to maintain a distance of 90 fathoms from setnet gear when the shoreward end of the drift gear is set in less than four fathoms of water.

The author of this proposal operates his set net gear almost exclusively in Foul Bay in the Eshamy district. A substantial number of sockeye salmon pass through this bay on the way to neighboring Main Bay and during closures often holds a large buildup of fish.

It can't be disputed that sockeye salmon like to hug the beach and there is very limited opportunity for drift fishermen to fish close to the beach in the Eshamy district because of the preponderance of set gillnets throughout the entire district. This proposal would limit even more the ability of drift fishermen to harvest a fair share of sockeye in the district.

Most drift fishermen fishing close to the beach use range finders to assure a legal distance from set net gear and pick up their gear when any part of it comes within 60 fathoms of a set net operation. Enforcement would not be any easier if this proposal were enacted.

Some set net operators including the author often set "dummy" sets, lines, anchors, and buoys with no net intended to block drift fishermen from legally fishing near the beach.

The set net fleet, 28 permits in all, often catches far above their allotted allocation of sockeyes as can be easily seen in the annual harvest data. This proposal would enhance that catch even more. Since set and drift gillnet cost recovery to pay for hatchery operations is rarely taken at Main Bay and almost exclusively in the Esther Subdistrict, a drift gillnet district only, set net operators essentially get a "free ride" from paying for the operational costs of Main Bay hatchery which grows the sockeye caught in the Eshamy district. They do not need nor deserve the advantages that this proposal would give them.

I urge you to take **NO ACTION** on this proposal.

Sincerely,

Steve Aberle, drift gillnetter



Submitted By
Steve Tucker
Submitted On
11/16/2017 9:01:26 AM
Affiliation

I have reviewed the proposals for the upcoming Valdez meeting in December and have the following comments:

Proposal 10 - Support. An OEG would help support ADFG management decisions.

Proposal 12 - Support. Without either a live well or someone attending the wheel while in operation, there is a possibility of an over catch. While I'm sure it would be unpopular with fish wheel owners, the wheels should be attended and monitored, while running, to ensure the authorized catch limit isn't exceeded.

Proposal 13 - Oppose. This appears to be a thinly veiled means of restricting access to the Copper River fishery. Dipnetting from a boat is still controlled by the individual (or family) subsistence limit. The means of catching is far less important than the potential for overfishing. Dipnetting (from either a boat or the shore) is a selective fishing method and excess kings can easily be released unharmed; however, unmonitored fish wheels with no live well will result in high mortality rates including potential bicatch or over-catch. Lastly, while I would agree that dipnetting is a "traditional" practice, fish wheels are non-indigenous machines introduced in the late 19th century; as such fish wheels are hardly "traditional". To improve fish numbers along the entire Copper River basin, perhaps fish wheels should be more highly regulated, limited, or eliminated.

Proposal 15 - Oppose. The current mesh standards are sufficient. The restrictions in this proposal may eventually lead to widespread non-compliance and the eventual ban of dipnetting altogether.

Proposal 19 - Oppose. Extending the subsistence dates by this much would make it much more difficult to manage the fishery. It would also likely increase enforcement and monitoring costs by ADFG. While dates could, and should, be adjusted annually based on ADFG monitoring, Turing a blanket date on fishing wouldn't be detrimental.

Proposal 20 - Oppose. Tributaries should be considered individually for inclusion or exclusion from subsistence fishing based on conditions and geography specific to each stream.

Applies to multiple proposals: the current subsistence limits of 30/60 is about right. However, the provision to increase the limit to up to 500 per household seems exorbitant. The total allowable subsistence limit needs to be reviewed, and the request provision needs to be amended to require a justification. If large numbers of fish are needed for dog food or other reasons, perhaps collection of post spawning fish from selected areas should be allowed to fill this requirement.



Submitted By
Steven Swartzbart
Submitted On
11/17/2017 2:34:04 PM
Affiliation
Copper River/Prince William Sound Commercial Fisherman

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My name is Steven Swartzbart and I am a second generation commercial fisherman. I started fishing with my father at a very young age on the Copper River and in Prince William Sound. In 2016 at the age of 18 I became the skipper and permit holder of the family drift gillnet boat. Regretfully I am unable to attend the Board of Fish session in Valdez because of prior commitments with college classes. I am thankful for the opportunity to write my comments to the board on some of the proposals I feel strongly about and could greatly impact my life.

Proposal 34

I am writing in opposition of proposal 34. This proposal will limit ADF&G's ability to properly manage the Copper River District commercial fishery. The miles lake sonar is located 33 miles away from the mouth of the Copper. This is a large distance for a fish to travel and is estimated to take about a week for the fish to travel this far up the river. Daily counts can be variable and just in 2017 almost 40,000 fish went by the sonar site in one day. My point here is that there can be a very large number of fish above the commercial fishing boundary lines and below the miles lake sonar station. This proposal could force the commercial fishery to be a week behind the run of fish. It could greatly impact the local economy of Cordova and the fisherman of the Copper River. This will greatly increase the risk of over escapement and will not allow ADF&G to use the commercial fleet as a management tool to determine how many fish are in front of the river.

Proposal 28

I am writing in support of this proposal 28. Lifting this regulation will allow ADF&G to have the freedom to do better in season management. The Copper River in recent years has seen many regulations to protect the kings for all user groups. These king closures are a good tool to be used when needed, but there is no reason to forceable place regulations on the commercial fishery if it is not needed. Lifting this regulation will allow ADF&G to manage the Copper River more effectively and give them the tools to do what is best for the salmon run.

Proposal 31

I am writing in opposition of proposal 31. This proposal would put a tremendous burden on the Copper River District commercial fishery. Commercial fishing nets are very expensive and if this proposal passes it would force every fisherman to construct new nets or greatly modify existing gear. Recent management actions have forced commercial fisherman out of traditional king salmon fishing areas. Reducing our net depth would affect our ability to catch reds and not have a large impact on the catch of kings.

Proposal 32

I am writing in opposition of proposal 32. Preseason predictions have been historically inaccurate. Making firm management decisions before any actual indication of the run strength is not a good way to manage an ever changing fishery. Management should not be forced to make decisions based on predictions of run strength. Management decisions that are made before the actual run have caused tensions in the past. I encourage the Board of Fish to consider the historical inaccuracy of preseason predictions and let the actual number of actual fish decide the management decisions. In season management of the commercial fishery has proven affective in the past, please don't let regulations inhibit ADF&G's ability to manage the Copper River District fishery.

Thank You



It has come to my attention that some one desires to change the ice fishing restriction on the Chatanika river from 3 miles upstream of Goldstream to one mile. I consider this proposal to be ill advised and illogical since the object of this restriction has been to rebuild the seriously depleted Pike stocks in Minto Flats and the Chatanika drainage. I propose, instead, that all ice fishing on the Chatanika and Tolovana Rivers be eliminated until the fishery recovers. My 35 years of, "catch and release", fishing experience in this area, convinces me that the Pike stocks are significantly lower than I experienced in the 80's. If it is politically impossible to defend the overwintering areas I suggest the bag and possession limits for Pike be extended to the subsistence fishery. Pike recruitment and growth rates do not support an unrestricted harvest of the sort I have observed at the mouth of Goldstream.

Stuart Varner



November 14, 2017

Dear Alaska Board of Fisheries,

Thank you for the opportunity to provide comment on Prince William Sound Finfish Proposals that will be decided at the December 1-5, 2017 Board Meeting in Valdez. My comments pertain to Proposals 40-49. Our family has been involved in Alaska commercial fishing operations since the early 1980s. I currently hold a set net permit in the Prince William Sound, Eshamy District and have been fishing that area for more than a decade.

Proposal 40. - RECOMMEND BOARD CONSIDER ALTERNATIVE DESCRIBED BELOW.

Proposal 40 identifies a problem that occurs across the entire Eshamy District. This problem is not limited to the Crafton Island Subdistrict. The problem is that some drift gillnet fishermen are not drifting as required by 5 AAC § 39.105(d)(3). Instead, they are setting, staking, anchoring or otherwise affixing their net to the seabed floor, or are using their engines to keep their net in the same location (sometimes for the entire opener which can be days). Understandably, Mr. Brown (a set gillnetter) is frustrated with continued violations. While there is merit in Mr. Brown's proposal to limit drift gillnet operations to deeper water to make it easier for enforcement personnel to identify and remedy violations, this proposal seeks an allocative change. The PWS Setnetters Association has consistently opposed allocative changes and has recommended the Board oppose allocative changes in the past. Therefore, for Proposal 40 to work, the Proposer would need to explain how this change could be made without impacting allocation. Additionally, it would not be equitable for the Board of Fish to make this change to remedy this problem for only a small number of set gillnetters fishing in the Crafton Island Subdistrict, and not resolve the matter for all set gillnetters across the entire Eshamy District.

This matter should either be resolved through improved Fish and Game Enforcement of existing regulations or be resolved equitably for the entire Eshamy District without allocative impacts.

Proposal 41. OPPOSE.

Proposal 41 requests the Board to allow drift gillnet fishermen to set a drift net from the shoreline to a point inside the start of a set gillnet that is attached to a pinnacle. I oppose this proposal.

Set gillnetters may attach their nets to pinnacles in areas of shallow water, where the large tidal fluctuation in Prince William Sound causes much of their net to be out of water at low tide. This means the water between the shoreline and the pinnacle is typically too shallow for a drifter to "drift." 5 AAC § 39.105(d)(3) states a drift gillnet fisherman must not set, stake, anchor or otherwise affix their net to the seabed floor. Therefore, it is not logical to allow a drift gillnet fisherman to set a net in shallow waters where violations of 5 AAC § 39.105(d)(3) will occur.

I oppose Proposal 41 because it will likely result in drift gillnet violations of 5 AAC § 39.105(d)(3) and exacerbate and compound enforcement problems in the Eshamy District.

Proposal 42. OPPOSE.

Current regulations (5 AAC § 24.367) require set gillnets to be 50 fathoms apart, and prohibit a drift gillnet from operating within 25 fathoms of a set gillnet. Proposal 42 requests the Board to reduce the 25



fathom distance to 20 fathoms. In the past the Board has increased drift gillnet separation distance from set gillnets to reduce conflict, not, decreased this distance. For example, in the Crafton Island Subdistrict, the Board of Fish increased the separation distance from 50 fathoms to 60 fathoms to reduce gear conflict.

I oppose Proposal 42 for the following reasons, it will:

1. Conflict with past Board of Fish precedent;
2. Exacerbate and compound existing gear group conflicts;
3. Disrupt the existing allocation between set and drift gillnet fishermen in favor of drift gillnet fishermen;
4. Further disadvantage set gillnet fishermen by allowing a drift net (150 fathoms long) that is already three times longer than allowed for a set gillnet (50 fathoms) to get even closer to a set gillnet; and
5. Will unnecessarily drain limited enforcement resources.

Current regulations prohibit a drift gillnet fisherman from setting between two set gillnets (set 50 fathoms apart) because it is physically impossible to fish a drift gillnet in between two set gillnets and maintain an exact distance of 25 fathoms from each set net while meeting the obligation to “drift” in accordance with 5 AAC § 39.105(d)(3).

Some drift gillnet fishermen violate existing regulations attempting to “thread-the-eye-of-a-needle” and maintain a 25 fathom separation between two set gillnets. The only way to do this would be to anchor the net in a position exactly 25 fathoms from each set net; yet, anchoring a drift gillnet is illegal. While, mathematically, and physically this is impractical and illegal, it has been persistent enforcement problem, consuming limited enforcement resources.

Enforcement personnel have consistently ticketed drift gillnet fishermen that attempt to fish in between two set nets (set 50 fathoms apart), because it is physically impossible to fish a drift gillnet in between two set gillnetters and maintain an exact distance of 25 fathoms from each set net while meeting the obligation to “drift”.

This same problem occurred in the Crafton Island Subdistrict where drift gillnet fishermen were attempting to “thread-the-eye-of-a-needle” and fish between set gillnets. The Board of Fish resolved this same enforcement problem by increasing the distance between a drift gillnet and a set gillnet, not decreasing the distance (as proposed). In the Crafton Island Subdistrict set nets are required to be 100 fathoms apart. Prior regulation required a 50 fathoms separation between drift gillnet and set gillnets. Gear conflict and enforcement matters became so troublesome, the Board of Fish increased the separation distance to 60 fathoms to make it abundantly clear that no drift gillnet fisherman should ever attempt to set between two set nets (set 100 fathoms apart).

If the Board does decide to modify distance between a drift and set gillnet in the Main Bay area, the distance should be increased from 25 fathoms to at least 30 fathoms to make it abundantly clear that drift gillnet fishermen cannot set their net between two set nets (50 fathoms apart).

Set net fishing locations are already extremely limited in time and area, compared to drift gillnet permits that are allowed to fish a substantially longer season, in multiple areas up to a mile offshore. It is unreasonable for set gillnet operations to be further reduced in time and area.



Proposal 43. OPPOSE.

Proposal 43 requests the Board to allow drift gillnet fishermen an unspecified amount of time to comply with the drift gillnet to set gillnet spacing rule, after a set gillnet is deployed. I oppose Proposal 43.

The proposer appears to be unfamiliar with set net operations, and other state regulations that provide set net fishermen priority use of their leased sites. This proposal is not only problematic because it will exacerbate gear conflict and enforcement matters, but directly conflicts with numerous other state regulations related to set net lease holder priority use.

Set net lease sites are clearly marked with signs posted on land, and with buoys and running lines clearly depicting the planned net location. Set net locations are leased from the Alaska Department of Natural Resources (ADNR). Set gillnet fishermen holding an ADNR lease have priority access to that specific location.

Because set gillnets are typically deployed in 50 fathoms sets, a set gillnet fisherman will move from one set net location to another until all of the nets are fishing. If a drift gillnet fisherman elects to set its net in that location prior to set net deployment, the drift gillnet fisherman must immediately move its net into a legal position after a set gillnet is in the water. The drift gillnet fisherman must take immediate steps to make its net legal.

Proposal 43 would allow a drift gillnet fisherman an unspecified amount of time (hours? days?) to “have time to retrieve its gear and/or navigate to legal waters.” This proposal will make it substantially more difficult for enforcement personnel to know at what point in time a drift gillnet is set illegally.

Significant enforcement problems have occurred where drift gillnet fisherman have refused to move, or take unreasonably long periods of time to move their net. To reduce gear conflict, many set net fishermen take time before an opener to talk to nearby drift gillnet fishermen to let them know where they plan to set and to proactively avoid gear conflict. Despite these cooperative, and proactive steps, some drift gillnet fishermen intentionally set their nets in leased sites, and then refuse to move when a set net is deployed.

Proposal 43 will only muddy enforcement matters.

If a drift gillnet fisherman would like prior access to a set net location, they should invest in a set gillnet permit, and invest in ADNR lease sites.

Set net fishing locations are already extremely limited in time and area, compared to drift gillnet permits that are allowed to fish a substantially longer season, in multiple areas up to a mile offshore. It is unreasonable for set gillnet operations to be further reduced in time and area.

Proposal 44. OPPOSE.

Proposal 44 is gravely flawed. I oppose Proposal 44.

Proposal 44 includes only one portion of the existing Eshamy District regulations for set gillnet operation in isolation (5 AAC § 24.331), while ignoring extensive and long-standing set gillnet regulations listed in 5 AAC § 39.107.

The proposer incorrectly concludes that set gillnet fisherman are currently operating gear “illegally” and falsely accuses Alaska Department of Fish and Game (ADF&G) for failing to enforce existing regulations. However, it is the proposer that is not familiar with long-standing regulations that are clearly different for set gillnet and drift gillnet fishermen.



5 AAC § 24.331 (b)(3) states “the operation of each gillnet shall be performed or assisted by the fisherman who holds the valid interim-use or entry permit card for that gear.” The definition of performed or assistance is further defined in 5 AAC § 39.107.

5 AAC § 39.107 clearly explains there are different rules for MOBILE fishermen (drifters) and STATIONARY fishermen (set gillnetters). 5 AAC § 39.107 reads:

5 AAC § 39.107. “(d) A person who holds a limited entry permit or an interim-use permit for stationary fishing gear must be physically present at a beach or riparian fishing site during the operation of net gear or other stationary fishing gear at the site, except when the permit holder is at or traveling to or from the location of (1) a sale of fish caught in the gear; or (2) other stationary gear of the permit holder. For purposes of this subsection "fishing site" includes any structure used for providing shelter in support of the operation of net gear or other stationary gear.

(e) A person who holds a CFEC permit for the operation of stationary net gear or fish wheels shall be within a reasonable distance of the gear when at a point of sale or at the location of other stationary gear of that permit holder. A "reasonable distance" means a distance that ensures that the CFEC permit holder retains competent supervision of the gear.” [Emphasis add].

Proposal 45. OPPOSE.

Proposal 45 requests the Board to limit the number of set gillnet sites deployed at any one time to a maximum of four sites. This proposal is unsafe. It does not take into account (1) weather uncertainty; (2) rapid changes in ADF&G fish opener announcements; (3) fish movements, and (4) does not recognize the considerable work required to setup and take out a set gillnet site. I oppose Proposal 45.

Set gillnet fishermen must set anchors and running lines prior to an opener. This work is hazardous involving deployment of heavy anchors and lines, and is most safely completed in good weather conditions, during certain tides, and when strong currents are not present.

Weather conditions can rapidly change, making some unprotected sites too dangerous to fish at the time of the opener. Set gillnet fisherman need to have the flexibility to set a sufficient number of sites during safe weather conditions, and have the flexibility to move to safer sites if weather becomes hazardous.

Additionally, Fish and Game announcements often provide little warning of area closures, requiring set gillnet sites to be setup in a variety of locations to provide fishermen flexibility to rapidly adjust fishing plans after the 2pm announcement. Limiting set gillnet sites to a maximum of four would be unreasonable.

Furthermore, Proposal 45 directly conflicts with all other set gillnet regulations. There is no other set net district in the State of Alaska, that I am aware of, that limits the number of set gillnet sets allowed. Proposal 45 requests the Board to take an unprecedented action that would not only adversely affect PWS set net operations, but could adversely impact other set net operations state wide (if this unfavorable precedent was established).

Furthermore, the proposer does not address the very serious and costly problem that is routinely occurring, where drift gillnet fishermen cut set net anchors and running lines, causing thousands of dollars of gear damage each year. This is the real issue that needs Board of Fish attention, not further limitations



on set net fishermen operations.

Proposal 46. OPPOSE.

Proposal 46 requests the Board to change the Main Bay Subdistrict closure line. Proposal 46 would adversely affect over 500 drift gillnet and set gillnet fisherman by reducing total fishing area when ADF&G limits fishing to the Main Bay Subdistrict only.

The same issues raised in Proposal 46 (about the location and history of Main Bay Subdistrict closure line) were thoroughly and professionally researched by the Alaska Department of Fish and Game (ADF&G), Alaska Department of Natural Resources (ADNR), and enforcement staff as part of a shore fishery leasing matter decided by the State of Alaska on March 18, 2016. Proposal 46 appears to be an attempt to re-adjudicate a matter already decided by the State of Alaska in 2015-2016.

It may be useful for the Board to obtain more information on the State of Alaska's decision on this matter in March 18, 2016 from Andrew Miller, Natural Resource Specialist, Alaska Department of Natural Resources (ADNR), Division of Mining, Land, and Water, Shore Fishery Leasing Program, 550 W 7th Ave Ste 900c, Anchorage, AK 99501-3577, Ph: (907) 269-8545.

We understand ADF&G will provide the Board with the Main Bay Subdistrict closure line history. That history will show the same information already adjudicated in 2015-2016, where the State of Alaska's review found the Main Bay Subdistrict Line has been in the same place for several decades, and not at the "rockpile" location described in Proposal 46.

Proposal 49. RECOMMEND BOARD CONSIDER ALTERNATIVE DESCRIBED BELOW.

Main Bay sockeyes and Wild Coghill Sockeyes are currently being intercepted in the south west district by the seine fleet. This sockeye interception problem has been raised to ADF&G attention on several occasions, yet, the problem persists. Fish tickets in the south west district clearly account for this problem. I request the Board of Fish address a solution that will resolve the Main Bay sockeye and Wild Coghill Sockeye interception and implement a solution in accordance with the existing PWS Management and Allocation Plan.

Thank you for the opportunity to comment

Eric Harvey
PO Box 771026
Eagle River, Alaska 99577

Susan Harvey
PO Box 771026
Eagle River, Alaska 99577

Max Harvey
PO Box 771026
Eagle River, Alaska 99577



Tatitlek Village IRA Council

"God's Country, USA"



MARCH. 13 2017

This so called ~~starting~~ HERRING
FISHING IN PRINCE WILLIAM SOUND
NEEDS TO BE ADDRESSED THIS YEAR
ENCLOSED IS DIFFERENT REPORTS.
LET US KNOW IF ANYTHING WILL HAPPEN THIS SPRING

David Tlemoff
TATITLEK IRA VILLAGE PRESIDENT

Rick Koyuk
Tatitlek Environmental Director

REGULATION PROPOSAL FORM for the
ALASKA BOARD OF FISHERIES 2017-2018 MEETING CYCLE
P.O. BOX 115526, JUNEAU, ALASKA 99811-5526



PC84
2 of 7

Proposals for this cycle are due April 11, 2017

**Indicates a required field*

BOARD OF FISHERIES REGULATIONS

- ☒ Subsistence ☐ Personal Use
☐ Sport ☐ Commercial



***Which meeting would you like to submit your proposal to?**

- ☒ Prince William Sound Finfish ☐ Southeast & Yakutat Finfish & Shellfish
☐ Statewide Dungeness Crab, Shrimp, and Other Miscellaneous Shellfish (Except Southeast & Yakutat)

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.

1. Alaska Administrative Code Number 5 AAC _____

***2. What is the issue you would like the board to address and why?**

HERRING STOCK IN PWS DEPLETION

***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

- 1 STOP SUBSISTENCE HERRING FISHING FOR SOME YEARS
2 CHANGE LENGTH OF GEAR TO 60 FEET.
3 MONITOR HOW MANY PERMITS AND AREA FISHED

***Submitted By:** DAVID TOTEMOFF TATITLIKIRA VILLAGE PRESIDENT
Individual or Organization

PO BOX 171

TATITLIK AK

99677

***Address**

***City, State**

***ZIP Code**

907.325.2386

907.325.2311

dtotemoff@rocketmail.com

***Home Phone**

***Work Phone**

***Email**



Subject: Re: Winter
From: dtotemoff@rocketmail.com (dtotemoff@rocketmail.com)
To: info@auklet.com;
Date: Monday, March 13, 2017 7:43 AM

Hope your trip will find some and as for trying to stop the spring herring fishing seems like the two departments are not being helpful but will sure keep trying the villages will support if we get the help from Fish and Game and Subsistence group.David

On Mar 12, 2017 8:56 PM, David Janka <info@auklet.com> wrote:

Thanks David.

I have not been out much but the one trip in early January was very quiet.

I will be heading to Valdez at the end of the week and am set up with the Science Center to take a couple of days to look around for any activity on the way over.

Then after 6 days in Valdez will take another look around on the way back to Cordova.

Science Center will be doing their acoustic survey with the ADFG boat Solstice this year. I think they will be out for about a week starting on the 27th/28th of March.

I may have a 5 day trip with them early to mid April.

Heard a report of herring and whale activity at Montague Island. Could be fish heading north.

Did you make any progress with getting ADFG to cancel any subsistence fishing on the herring? Would really hate to see that again.

Sounds like the herring biomass last spring was half of the year before. That means only around 9 metric tons. Very sad to hear.

Outside of all that I hope you are doing well. Cheers, David

On Mar 12, 2017, at 4:56 PM, dtotemoff@rocketmail.com wrote:

Fyi this past winter was the slowest on seeing any herring activity or feeding birds around the area.David

Auklet Charter Services est. 1995
David and Annette Janka
907-253-3428 www.auklet.com

Follow us on Facebook at Auklet Charter Services.

- Never Normalize Trump -

Hope your trip will find some and as for trying to stop the spring herring fishing seems like the two departments are not being helpful but will sure keep trying the villages will support if we get the help from Fish and Game and Subsistence group.David



Subject: Re: Fw: herring

From: dtotemoff@rocketmail.com (dtotemoff@rocketmail.com)

To: katerina_wessels@fws.gov;

Date: Monday, March 13, 2017 8:04 AM



Just wondering how many herring it takes to fill minimum ten five gallon buckets of herring roe and if six or more boats do the same type of so called herring Subsistence and how much will one bucket be worth if sold.thanks David Totemoff Tatitlek IRA Village President.

On Mar 3, 2017 9:45 AM, David Totemoff <dtotemoff@rocketmail.com> wrote:
message from Scott.David

On Friday, March 3, 2017 8:01 AM, Scott Pegau <wspegau@pwssc.org> wrote:

Hi David,

I am not sure how to stop the big gillnetters. I guess you could ask for an emergency closure, but that would hit Tatitlek as well. Maybe the fishery can be closed, but collection of roe on kelp be allowed. Maybe there could be a proposal to limit the length of net, or amount of fish that can be taken. I think the village will need to be the driver of any request to ensure it meets your needs.
Scott

W. Scott Pegau
Research Program Manager
Oil Spill Recovery Institute
Box 705
Cordova, AK 99574
907-424-5800 x222
www.pws-osri.org

From: dtotemoff [mailto:dtotemoff@rocketmail.com]
Sent: Thursday, March 2, 2017 8:26 PM
To: Scott Pegau <wspegau@pwssc.org>
Subject: RE: herring

Thanks for your message and how could we stop the big herring gillnetters that happen each spring.

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Scott Pegau <wspegau@pwssc.org>
Date: 3/2/17 11:23 AM (GMT-09:00)
To: David Totemoff <dtotemoff@rocketmail.com>
Subject: herring

Hi David,

I hope all is going well for you. We are gearing up for our herring work this spring and I want to make sure we stay in touch with someone in Tatitlek. We asked Dave Janka to look in Gravina and Fildago to see if there are any fish around when he heads up to Valdez around the 17th. I suspect



that ADF&G will start flying around then as well. Please keep us in mind if you hear to fish around there.

As you are well aware, last year was the lowest recorded number of miles of spawn and acoustic estimates of biomass. There is a hint that there may have been a disease outbreak a couple years ago that is responsible for the collapse, but those are very early results and they may change as new information becomes available. The biggest issue is that we are trying to use a brand new technique to detect evidence of disease within the previous year and not just identify fish that are currently sick.

I don't know if you guys put anything into fish and game to restrict subsistence herring fishing. It might be worth keeping the fishery closed for a couple years to see if things can turn around some.

Thanks

Scott

W. Scott Pegau
Research Program Manager
Oil Spill Recovery Institute
Box 705
Cordova, AK 99574
907-424-5800 x222
www.pws-osri.org

Just wondering how many herring it takes to fill minimum ten five gallon buckets of herring roe and if six or more boats do the same type of so called herring Subsistence and how much will one bucket be worth if sold. thanks David Totemoff Tatitlek IRA Village President.



Subject: RE: Board of Fisheries Proposal form
From: dtotemoff (dtotemoff@rocketmail.com)
To: jeremy.botz@alaska.gov;
Date: Friday, March 3, 2017 2:31 PM

Thank you David Totemoff Tatitlek IRA Village President.

Sent from my Samsung Galaxy smartphone.

Thank you David Totemoff Tatitlek IRA Village President.

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: "Botz, Jeremy C (DFG)" <jeremy.botz@alaska.gov>
Date: 3/3/17 2:09 PM (GMT-09:00)
To: dtotemoff@rocketmail.com
Subject: Board of Fisheries Proposal form

Hi David,

Attached is the proposal form that I mentioned over the phone. The next PWS Board of Fisheries meeting is this coming December in Valdez and the submission deadline for proposals is April 11. Please let me know if I can be of further assistance.

WE CANNOT WAIT TILL NEXT YEAR TO ADDRESS
THIS.

Thanks,

Jeremy

David Totemoff
Tatitlek IRA Village President

----- Original message -----**From:** "Botz, Jeremy C (DFG)" <jeremy.botz@alaska.gov> **Date:** 3/3/17 2:09 PM (GMT-09:00) **To:** dtotemoff@rocketmail.com **Subject:** Board of Fisheries Proposal form

Hi David,

Attached is the proposal form that I mentioned over the phone. The next PWS Board of Fisheries meeting is this coming December in Valdez and the submission deadline for proposals is April 11. Please let me know if I can be of further assistance.

Thanks,

Jeremy



PC84
7 of 7



Submitted By
Thea Thomas
Submitted On
11/8/2017 9:26:34 AM
Affiliation
Area E Commercial Fisherman

Phone
907-424-5266
Email
thea@ctcak.net
Address
PO Box 1566
112 South 2nd St.
Cordova, Alaska 99574

Thank you for taking the time to read and consider my comments. I have been a commercial fisherman in the Copper River/Prince William Sound area for over 30 years. I have also been involved with the Alaska Seafood Marketing Institute for 15 years, have served on the PWSAC board and am presently on the Regional Seafood Development Association board. Today I am submitting these comments on my own behalf.

Through my involvement with ASMI, I have been proud to tell the world about sustainable fisheries in Alaska. Our Responsible Fisheries Management model is based on using in-season science based information. The foundation being **In-season assessments of run strength and monitoring of escapements using the best scientific data and methods available**. This year on the Copper River, we saw ADF&G go against these founding principals. Based on a pre-season forecast for Copper River King salmon we had "unprecedented restrictions" placed on the all the fisheries, before the season had started. As you can imagine this caused an uproar and resulted in many of the proposals you see before you today. Specifically **Proposals 29, 31, 32, 33 and 34**, were submitted before the start of the season. I fully understand that king salmon stocks around the state are a concern, but the Copper River had a strong return of king salmon. I am **opposed** to any changes of the Copper River King Salmon Management Plan or the Copper River District Salmon Management Plan. ADF&G, if they follow the principals of in-season science based management using the best data available, have all the tools they need to manage the fishery.

There are proposals before you wanting to make changes to the Subsistence Management plan in the lower Copper River. I am opposed to any expansion of the subsistence season in the lower Copper River, as suggested in **Proposals 19 and 20**. I rarely hear subsistence fishermen say that they do not have enough opportunity to get their fish.

One area of concern in the Chitina/Glenallen subdistrict fisheries is the expanding commercial enterprise of guiding and chartering Personal Use and Subsistence fisherman. I am not advocating that we limit this activity, but we need to hold these operators to the same criteria of other freshwater guide and charter operators in the state. Many of these operators are "accompanying or physically directing" their clients, which is the definition for the requirement of a guide as outlined in ADF&G regulations. They should be required to have a ADF&G license and maintain log books.

There are several proposals before you, concerning the drift gillnet and set gillnet fisheries in the Crafton Island and Main Bay subdistricts. The problem here is that the setnet fleet in 4 out of the last 5 years, have exceeded their allocation percentage as outlined in the Prince William Sound Allocation Plan. Several years ago the board adopted a regulation to address this issue. The regulation 5 AAC 24.370 (f) restricts openers for set gill nets to no more than 36 hours per week, after July 10th, during the year following the year the allocation was exceeded. The problem is that in recent years the fishing time for both gear types has been greatly reduced in this area. This results in the time reduction for setnetters being meaningless. In 2016, they harvested 10% of the value of enhanced fish, when they are allocated 4%. Another method needs to be adopted to address the setnet over harvest. **Proposal 45** submitted by CDFU to limit the number of set gillnet sites deployed with lines and buoys is the best way to address this problem. This would open up more shoreline to the drift fleet, and hopefully bring the harvest levels back to those outlined in the Allocation Plan.

Proposal 47 addresses the PWS Management and Salmon Enhancement Allocation Plan, you will notice that it is not the Prince William Sound Aquaculture Corporation Allocation Plan. This allocation plan and I quote from the plan in regulation "...is to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine and set gillnet commercial fisheries". When this plan was originally adopted it included all enhanced fish similar to Southeast Alaska's allocation plan. Later, for political reasons, the plan was changed to exclude salmon produced by the Valdez Fisheries Development Assn. with the addition of section (j). This section should be deleted and the plan changed to include all enhanced fish as it was originally intended.

Proposal 49 addresses the continued problem of the interception of fully allocated sockeye salmon in the AFK Terminal Harvest Area. According the PWS Allocation Plan there is to be no seining in the Southwest District prior July 18th. Yet PWSAC began releasing Chum salmon at the AFK Hatchery. The problem is that the seine fleet intercepts sockeye salmon which are bound for the Coghill River or fully allocated to the drift and set gillnet fleets. This needs to be addressed by restricting the harvest to Cost Recovery or restrict the CPF to the Special Harvest Area.

Proposals 38 & 39 propose changes to the seine specifications allowing seine web throughout the entire net including the lead. This change would greatly increase the efficiency of a seine. This only makes sense if you allow permit stacking with second permit onboard,

thus reducing the total number of boats fishing in the fleet.





DATE: November 13, 2017

TO: Board of Fish
State of Alaska

FROM: Thomas J. Aberle
PWS Setnet Permit Holder
429 W 10th St.
Juneau, AK 99801
(907)321-2737

Mr. Chairman and Board of Fish Members:

My name is Tom Aberle and I have been a set gillnet permit holder in Prince William Sound since 1985, for a total of 33 seasons. Thank you for allowing me to comment on a number of Prince William Sound proposals.

Proposal 42: OPPOSE

This proposal is strictly allocative, with the drift fleet trying to increase fishing area that has been allocated to the setnet fleet. In 1983 and 1984, the first two years of the Main Bay Hatchery salmon harvests, the setnet fleet could deploy 100 fathom nets anywhere in Main Bay as per the rest of the Eshamy district. At the 1984 Board of Fish meetings, the setnet fleet gave up being able to fish 100 fathom nets within the Terminal Harvest Area in exchange for 50 fathom sites within the Terminal Harvest Area and 25 fathom setbacks from drift and setnet gear. Outside the Terminal Harvest Area the setnet fleet was allowed to have 100 fathom nets but the distance between setnets in this portion of the new Main Bay Subdistrict had to be 100 fathoms. The drift fleet however could still set within 25 fathoms of our nets in this area. This is the way the regulations continue to read to this day.

For the first 15 to 20 years that I fished there was very little trooper enforcement in May Bay. As a result I often had drifters round-hauling with their 150 fathom nets between my 50 fathom setnets deployed within the Terminal Harvest Area. As a result their nets would be laced together with mine because of fish in their nets, they would get all the fish, I would get virtually none. It was a frustrating situation to say the least.

Today, with much more enforcement present at the openings in Main Bay, things are notably better. The intimidation however does not stop. On every opener I have certain drifters yelling at me how they are going to come in and "scoop up those fish."

The proposal change to a 20 foot fathom setback would be a nightmare for enforcement and a critical loss for the setnet fleet in their ability to harvest fish. The proposal that a 5 to 6 fathom driftboat could operate and work their gear in a 10 fathom slot between our nets is unrealistic and crazy. It only invites more gear conflict and more chance of injury to the setnet fleet operating out of our open skiffs.

Most of the setnet sites within the Terminal Harvest Area are leased under the State of Alaska Shore Fishery Lease Program. This gives us exclusive rights to 50 fathoms of beach, 25 fathoms on each side of our net. This proposed regulation change to a 20 fathom setback would be in direct violation of our State of Alaska shore fishery leases and should not be considered.



Proposal 43: OPPOSED

This proposal, along with proposal 44, seek to limit setnet fishermen to one 50 fathom net during build-up openings in Main Bay. To my knowledge there has never been a ticket written to a drift fisherman for not getting his gear out of the water fast enough when a setnet fisherman wants to deploy a net on the site. This is another strictly allocative proposal. Combined with proposal 44, what certain members of the drift sleet are saying is that only one setnet skiff with the setnet permit holder on board can deploy a net, but then when the setnet holder goes to deploy their second net and finds a drift net draped over their running line (which will be the case on Main Bay build-ups) the drift net permit holder cannot be issued a ticket if they take their time hauling in their gear so that the setnet permit holder can deploy their net. Needless to say, by this time the drift permit holder has already caught any build-up of fish that might have been present at the opening of the period. This proposal increases the chance of gear conflicts and aggression between the two gear groups and presents a nightmare for trooper enforcement.

Furthermore, our shore fishery leases with the State of Alaska give us exclusive rights to those sets on the beach. Let's not forget that the drift fleet has exclusive rights to ALL area offshore of our nets deployed from the beach which is the vast majority of the waters of the Main Bay Subdistrict. It is hard enough sitting on my 50 fathom beach set with a 150 fathom drift net deployed on each side of me just 25 fathoms away.

Proposal 44: OPPOSE

Strictly allocative in nature, this proposal attempts to restrict set gillnet fishermen to one 50 fathom net of Main Bay build-ups. It states set gillnet holders are illegally allowing crewmembers to set nets and work the gear. This statement is FALSE. For set gillnet gear the definition of a fishing site and an explanation of performing or assisting is provided in 5AAC39.107(d). Under current regulations setnet permit holders are considered present as long as they are present at the specific fishing sites, traveling to or from other gear, traveling to deliver fish, or in any structure used for shelter in the support of the operation of set gear or other stationary gear. Setnet crew can set and work gear as long as the permit holder is in the district. This is consistent all across the State of Alaska where set gillnets are legal: Kodiak, Cook Inlet, Bristol Bay, False Pass.

This proposal attempts to limit us to 50 fathoms on the build-up, reducing by 2/3 of our ability to catch fish. It is nothing more than allocative and illegal under 5AAC39.107(d).

Proposal 45: OPPOSE

This proposal attempts to limit a set permit holder to no more than 4 sets with lines and bouys present. This proposal has come up in the last three BOF sessions and has failed in each one due to safety concerns and gear conflicts. In recent years we have been bounced all over different parts of the Eshamy District: Inside Main Bay only, outside Main Bay only, north of a line at Loomis Creek, south of a line at Loomis Creek, south of a line by Foul Bay. In other words, we never know where we are going to be allowed to fish by emergency order as ADF&G tries to conserve wild Coghill stock sockeyes, wild Eshmay stock sockeyes, or get brood stock and cost recovery back to Main Bay. Set gillnetters need to have places to fish set up for many different circumstances.

Sinking running lines and clipping bouys may seem to make sense but in reality adds to conflict. Twenty years ago I used this method on a set I fished down by the north line of the district. An hour before the opening I went and raised the sunken line and clipped on my bouy. There was a drift gillnetter sitting right there and he told me that he had been there for six hours and it was his set. I explained that I had a set gillnet permit which allowed me to set from shore and that I had fished the



site previously but had sunken the site to not be a hindrance to navigation. He became enraged, promised to "F*** with you forever, you will never catch another fish!" When it came time to set my net he continually ran circles in front of me, waking me. He threw coffee cups at me and essentially prevented me from setting my net. I pulled back in what little net I had gotten deployed and ran back to Main Bay with my tail between my legs. The gillnetter later admitted the offense to the troopers when contacted in Cordova after the period.

Other times I have come out to set my nets in the outer district where the lines were sunken only to find nothing there—not a sign, not a running line, none of my bouys, none of the four anchors. Nothing! My cost: \$1500. A set gillnetter never wins those conflicts. We cannot guard our gear 24 hours a day. Most setnetters have stories like these.

Proposal 46: STRONGLY SUPPORT

Re-establish the traditional lines in Main Bay where the marker signs have always been. For the past 31 years there have been signs in the Main Bay Subdistrict marking the Subdistrict lines, the Terminal Harvest lines, the Special Harvest lines and the Alternating Gear Zone lines. Recently many of these signs have been taken down and new lines have been established using GPS. Many of us had sites on those old established lines which are no longer valid. I bought a site on a line from another set gillnet fisherman for \$20,000. I registered it with the Shore Lease Fishery program, now it is no longer a line. The original lines were established 31 years ago after the 1984 BOF meeting when the Main Bay Subdistrict Plan was established. GPS was science fiction at the time the lines were established and signs put up. Now the GPS points are up in the woods far from the shoreline. Hand held GPS devices are all but useless for finding the lines. Unless you have a plotter, which nobody in an open skiff has, you can't find the line. This is happening all over the State of Alaska now and is a real problem. Each district can decide how they want to handle the problem and results are all over the board. I would urge the board to please re-establish the lines where the signs have been for the last 31 years. It is the fairest way for all the fishermen in the Eshamy District, especially the old timers.

Thank you for your consideration of all my comments. I thank and applaud you for all your volunteer time and effort and for the process which you have allowed to continue. Again, thank you so much.

Sincerely,

Tom Aberle

Permit # 60259Z



Submitted By
Tom Baring
Submitted On
11/14/2017 10:50:37 PM
Affiliation

I support the following proposal:

PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit using a dip net from a boat to harvest salmon in the Glennallen Subdistrict, as follows:(b)(5) It is unlawful to harvest salmon using a dip net from a boat in the Glennallen Subdistrict.

Dipnetters fishing from boats dramatically slow the fishing for dipnetters operating upstream (or even shut it down completely). There are of course many variables which affect the fishing, However, for the past 5 or so years since fishing from boats became popular in the Copper River Canyon I've experienced this effect multiple times. When dipnetters on shore succeed it is not at the expense of those further up river. Conflicts over holes generally don't occur because everyone knows it's "first come first served." But a boat can pull up below your hole at anytime and when this happens, you know the fishing is about to get much worse.



Submitted By
Toni Godes
Submitted On
11/17/2017 3:43:34 PM
Affiliation
F/V Qumalat

Proposal 10: Oppose

Regarding Proposal 10 to "set an OEG of 700,000-1.2 million for Copper River Sockeye matching late run Kenai sockeye OEG": First I need to ask why it would make sense to apply a number developed from another fishery for an unrelated and dissimilar fishery. From the beginning the logic of this proposal is flawed. Furthermore, the SEG number has been working on the Copper, and the numbers often exceed this range. And, as CDFU points out, "the lowest threshold of the proposed number would be higher than the current upper escapement goal."

Proposal 13: Support

I support the proposal to "prohibit using a dip net from a boat to harvest salmon in the Glennallen subdistrict." I'd really hate to see the Copper become a zoo like the Kenai; perhaps this is one way to protect the river and prioritize the people who live there and depend on the resource. It is greatly concerning that boats with fish-finding electronics could be so efficient as to be seriously limiting the ability of kings to make it to their spawning grounds.

Proposal 14: Oppose

This proposal is well intended, in the spirit of chinook conservation, but until we have the tools in place to better estimate king returns, I oppose managing the fishery based on chinook forecasts. I am hoping the new Miles Lake Tyson sonar will enable us to do just that in the near future. Season 2017 is a good example of how managing based on a chinook forecast and not in-season information proved problematic.

Proposal 15: Support

The Wrangell St. Elias NPC makes an excellent point about monofilament line and the unintended harm to Chinook that are to be released.

Proposal 17: Oppose

I oppose doubling the area that dipnetters are allowed to fish. Opening more of the river to more boats with fish-finding capabilities is not the way promote Chinook conservation. Furthermore, this shallow and braided section will make it easier to target kings. Allowing for more boats on the river also means more human impact: garbage, fuel, break downs and rescue missions. The Copper River has a reputation of being pristine, but this kind of inevitable environmental impact and increased river pressure only lessens the health of the whole system.

Proposal 18: Oppose

I can understand upriver concerns here, in that the way this is written the red abundance in certain scenarios could be good, and yet the dipnetters would be held to a maximum of 50,000 fish. However, I don't want to see dipnetters catching kings and reds when the commercial fleet is closed down for weeks at a time. We would all need to share the burden in these situations.

Proposal 19: Oppose

I sympathize with Cordova subsistence users. Access has always been difficult, and it is only getting more difficult with inside closures. However, this proposal is unrealistic on a number of points. First off, why would subsistence be allowed when closures (perhaps extended closures) of the commercial fleet could be indicating a need to conserve the resource? Perhaps his proposal would make more sense if it was started later in the season, after enough kings had passed above Miles Lake sonar to satisfy user groups, on a year of low Chinook abundance. If subsistence was open in Cordova May 1st and not upriver, there would be disgruntled subsistence users upriver. Additionally, a May 1st opening for subsistence would engage the portion of the gillnet fleet that is eligible for subsistence (and those they take out on boat), increasing the pressure on the early run. It doesn't help that catch reports are delayed, due to the current report requirements, therefore lessening its potential to be a management tool.

Proposal 21: Oppose

Proposal 22: Oppose

Proposal 23: Support

Catch and release of finfish in fresh water is detrimental to the fish and, therefore, the population.



Proposal 27: Oppose

Proposal 29: Oppose

The language in this proposal was inflammatory, uninformed, and false (refer to CDFU's statement on misinformation). Not fishing inside has greatly minimized king catch, as have the on-average 12 hr/twice a week periods—24 hours of 168, more than enough time for fish to travel up beyond the reach of the gillnet fleet. In addition, many years, fish travel deep and few are caught in deep waters or on the "rips" in front of bars. We have experienced quite a few years of this phenomenon, at least the last three, that I can recall. Some attribute this to fish swimming deeper to avoid the warm waters on the top of water column. And there are the bigger unknowns of what is happening in the ocean for all king runs in the state. Moving the gillnet fleet a quarter mile off the beach would make it very hard to make a living, as eliminating the inside has taken a great toll on the small boats in the fleet.

Proposal 31: Oppose

Reducing the net to 12 feet is ridiculous in an ocean fishery, especially when shallow inside waters have already been eliminated. Unlike the Fairbanks sport fishermen, Copper River gillnetters are actually trying to make a living and are heavily invested. The cost of another net and the reduced returns (I would wager returns could be easily cut in half or more) for the same amount of fuel/overhead would cause serious distress in the fishery. Over escapement also becomes an issue in this scenario.

Proposal 32: Oppose

All of the Fairbanks Fish and Game Advisory Board proposals are so poorly argued that it is not worth my time to argue each of their "alternative facts." I advise them to have someone fact check their ad hoc proposals before they submit them—and lose the sensational, non-professional language.

Not fishing in May if the forecast is less than 35,000 or less than the 20-year average is an argument with many pitfalls.

Proposal 33: Oppose

Oh my. Another doosie. And why would I donate my fish to the wealthy Fairbanks sport fishermen who have a minimal financial investment in the fishery and do not live on the river?? The Yukon is not comparable to the Copper any more than the Kenai is; this is a faulty analogy.

Proposal 34: Oppose

I have nothing to add to CDFU remarks. 2013 is an excellent example of why this kind of mandatory policy doesn't make sense.

Proposal 37: Support

I support this proposal in the interest of spreading the fleet out. Furthermore, king runs are probably less impacted here. This proposal is worth considering if fish interception is concluded as minimal.



Proposal 40: Oppose

Proposal 41: Support

Submitted By

Toni Godes

Submitted On

11/17/2017 8:01:20 AM

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Regarding CDFU Proposal 16 requiring log books from sport guides, all efforts to get a better understanding of what fish are being caught in-river, and where, is necessary and good for long-term management efforts. Records of fish caught at the mouth of the river are well-understood; records upriver are missing or questionable and unenforced. I support CDFU Proposal 16.



11/17/2017

Dear Board of Fisheries members,

Allow a short introduction: I am a resident of Cordova, commercial drift gillnetter, subsistence and sport user, and mother of two young boys that cares about Alaska, its resources and our future. Thank you for the opportunity to comment on the proposals found in the 2017 PWS finfish booklet. Your work and time is greatly appreciated.

Proposal 10 – OPPOSE

I'd reference the department's comments that since the Copper River sockeye SEG was established, the goal has been met in 36 out of 37 years. It has been efficient at meeting demands of many users. It is not good practice to set an OEG simply based off another watershed's goal. As you look at the parent year escapements of our 2016 and 2017 returns, I agree with the department that this increase would likely result in reduced yields and salmon productivity.

Proposal 16 – SUPPORT

As commercial operators on the delta, we are responsible to provide immediate harvest data to managers to assist in their in-season and post season management strategies. As a business operator, your responsibility is higher to assist managers with real time data. Harvest and area where harvested is a management tool. While the department does not want duplicate information, turning the responsibility over to charter operators to report harvests on a weekly basis would give more information. This is something managers might certainly need for better king enumeration and possible with better technology.

Proposal 17 – OPPOSE

The current area accommodates the allocation demands from the PU fishery. Doubling their area size is not necessary for harvest needs and would have negative implications on the Native Village of Eyak's mark-recapture chinook project. This is the primary tool, beside commercial harvest, that managers have to enumerate chinook salmon.

Proposal 18 – OPPOSE

Each year, the author of this proposal asks for mandatory time and area closures for the Copper River commercial fishery, regardless of in-season data of run strengths. This regulation was put into place to ensure the burden of conservation is shared amongst users and we are all in this together. By eliminating it, without similar consideration for the commercial users mandatory closures would not be appropriate. This is a justified tool for a fishery that is opened until closed, unlike the commercial fishery that is closed until opened. I'd refer to the department's comments, "There is no inseason monitoring of harvest and thus no mechanism to adjust the fishing time based on actual harvest."

Proposal 28 – SUPPORT



The department has been much more conservative when this regulation stipulates since I've been fishing. Inside closures are a tool they use annually because of their uncertainty in chinook data. If chinook and sockeye run strengths warrant inside openers, I would hope the department could liberalize opportunity on the inside.

Each year, the fish return differently. Some years the sockeye hug the beaches and mill inside the islands, instead of out in the ocean. This missed opportunity can be seen from recent high escapement years and now we are seeing the protégé returns from those high escapement years. I'd refer to the department's comments in Proposal 10 on productivity of higher escapement.

Proposal 29 & 31 & 32 – OPPOSE

These proposals state that chinook salmon are a stock of concern. This is inaccurate; as is the statements that opportunity for king salmon was eliminated. I'm sensitive to their concerns though. After the preseason forecast was announced in early spring, managers severely restricted chinook allowances for subsistence, sport, and PU fisheries, as these fisheries become opened until closed. Commercial managers did not announce closures or restrictions at this same time, primarily as we are closed until opened. Politically, this was not the best strategies as we commercial users were reduced greatly by time and area once May rolled around. By April, these proposals and an emergency petition to the BOF were written to ensure commercial users share in the burden. We did.

Chinook data is quite low on the Copper River and managers have limited resources for in-season data. Even with these restrictions, they were able to use commercial harvest data and NVE fish wheels to make in-season decisions to liberalize the subsistence and PU fisheries. There are questions whether pre-season forecasting is necessary with technology and speed in which managers can react to in-season run strength.

Regarding these specific proposals, the department has EO authority to manage in-season for abundance and run strengths. None of these mandatory restrictions are necessary.

Proposal 34 – OPPOSE

Refer to departments comments on managing for escapement and timing of Miles Lake as an efficient tool.

Proposal 40 – OPPOSE

This proposal would reallocate sockeye in the Main Bay district from gillnet to setnet users. This is not necessary as the setnet users have met and exceeded their share according to the PWS Allocation Plan. As the department comments state, "Nearshore fishing opportunity would be reduced for the drift gillnet fleet in the Crafton Island Subdistrict" as fish generally run the shoreline.

The PWS Allocation Plan's trigger for when the set net users are above their percentage is ineffective, as the peak of the run is July 4th. Also, while the gillnet and seine fleets offer the other group relief in cost recovery burdens through the PWSAC cost recovery process, the set net fleet has benefited without



contributing to the cost recovery burden. PWSAC focuses on taking gillnet cost recovery from Esther chums, simply for efficiency in the process, therefore the set net fleet most often doesn't share in paying for Main Bay operations. There are no efficient ways to balance.

Reallocating more fish to the set net users will not help balance their percentage.

Proposal 42 – SUPPORT

This proposal gives some drifting room to the drift gillnet fleet that must squeeze between two set net operations that require operations be 50 fathoms apart. Set net operators get frustrated as drift operators work to maintain their 25 fathom distance. This proposal would alleviate confrontations and frustrations on both sides, as well as enforcement stress of responding to numerous calls from the set net fleet.

Proposal 43 - SUPPORT

Main Bay sockeye, unlike our Coghill chums, have a reputation of heading straight to Main Bay and mill in the shallows by the head of the hatchery. There is a large buildup of sockeye to harvest at the start of each opener and nets are very close together. I wasn't around at its inception when the board made it regulation to maintain a 25 fathom distance but some remember that this regulation wasn't to move out gillnet opportunity and access to cleanups in Main Bay. This is what has been slowly happening as enforcement is forced to interpret the regulation.

Proposal 44 – SUPPORT

This proposal clarifies that the permit holder must be onboard. That means the permit holder's crew can't deploy two or three sites at once and give clean up access to all users.

Proposal 45 – SUPPORT

This proposal would clean up the shoreline and provide additional area for drift gillnet fishermen to operate. Often, sites are deployed for the season, even if not used for that fishing period or week. Two years ago, I fished along a beach that had deployed lines, anchors, and bouys but the operator did not ever set his net here the whole season. I've also drifted onto lines set for a site that wasn't being used and found it had hooks sewn onto the line. It was very dangerous to retrieve my net and so moved locations. If the site isn't to be used that period, it would be best to pull anchors and move lines for others to fish there.

Proposal 47 - AMENDMENT

I don't know whether to oppose or support this proposal because much work is needed on everyone's part. Our goal is to equitably share in the value of our fisheries between users. I believe it is time to review our existing allocation plan but need a plan. It won't happen at this BOF cycle meeting. That's wishful thinking and requires much work.



I propose the BOF organize a workgroup of shareholders to spend a year to review the PWS Allocation Plan, hear each gear group's concerns, and make recommendations to the BOF in one year at an out of cycle meeting, perhaps Spring 2019.

These concerns may include Mr. Bowen's request to look at adding VFDA value. Also, I would like to discuss the 47% trigger that says seiners must give Port Chalmers chum return to the gillnet fleet when below 47% or gillnetters must give Esther chum return to the seine fleet when below 47%. Port Chalmers and Esther are not equitable triggers. In fact, production at Port Chalmers is so low that it has been a net loss to the gear group that fished it three out of the last five years. The PWSAC board is having discussions on how to get out of the Port Chalmers remote release program. This production change would require a change to the Allocation Plan.

I believe this workgroup must be BOF driven because the PWSAC board must focus on operations and can't afford allocation battles in the board room. With that said, I feel PWSAC and CDFU have a responsibility to help facilitate these meetings and structure.

Thank you for the opportunity to comment on these proposals. This process is so important to our state and our fishery's future. I will not be in attendance in Valdez, as we are welcoming a new baby pretty quick.

Wishing everyone a good, productive meeting.

Best,

Tracey Nuzzi



Submitted By
Travis Williamson
Submitted On
11/17/2017 10:20:42 PM
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Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Submitted By
wade buscher
Submitted On
11/17/2017 3:05:48 PM
Affiliation

My name is Wade Buscher and I'm an Area E gillnet fisherman and live in Cordova. I agree and support all the comments submitted by CDFU. I've made some comments regarding those issues that are most pertinent to me as a commercial salmon fisherman.

Thank you

PROPOSAL 10

5 AAC 24.360. Copper River District Salmon Management Plan.

Set an optimal escapement goal for Copper River sockeye salmon, as follows:

Set an OEG of 700,000-1,200,000 for Copper River Sockeye matching the late run Kenai Sockeye OEG. The Copper River is a much longer drainage with more spawning and rearing habitat than the Kenai. The current SEG of 360,000-750,000 is artificially low but is cited by the commercial fish managers as the primary justification for continuing to exploit King Salmon. Over escapement of sockeye has never been a true biological concern on the Copper River and should not be cited as an excuse to harvest Kings.

What is the issue you would like the board to address and why? Having no OEG for Sockeye causes managers to exploit Kings under the excuse of trying to avoid exceeding the sockeye SEG.

I oppose proposal 10

The suggestion that the ADF&G manages the Copper River Salmon fishery in such a fashion as to "exploit kings under the excuse of trying to avoid exceeding the sockeye SEG" not only oversimplifies the methods and goals of sound fisheries management but also gives little credence to the actions and limitations placed on the commercial fleet in recent years. In the relatively short amount of time that I have been an Area E commercial fisherman (2000-present) I have seen consistently more time/area restrictions in response to lower king returns, and consequently more escapement of sockeye up river. And never in this short amount of time have I ever heard anyone from the ADF&G suggest that we should continue to fish to keep from exceeding the sockeye SEG. Setting an OEG to 700,000-1.2 million along with the already mandatory king closure restrictions would put greater financial hardships on the commercial fleet in the form of more lost opportunity.

I oppose proposal 10

PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit using a dip net from a boat to harvest salmon in the Glennallen Subdistrict, as follows:

(b)(5) It is unlawful to harvest salmon using a dip net from a boat in the Glennallen Subdistrict.

I support proposal 13

If boats continue to be used for 'personal use' harvest of salmon on the Copper River, and it's shown that these boats increase the effectiveness of catching both Sockeye and Chinook salmon compared to dipnets from the beach, and the number of boats on the river continue to increase, then limitations to this type of fishing should be considered.

I support proposal 13

PROPOSAL 14

5 AAC 24.361. Copper River King Salmon Management Plan.

Modify the season dates for the Glennallen Subdistrict subsistence salmon fishery based on the preseason king salmon harvest projection, as follows:

I oppose proposal 14



Conservation of Copper River Chinook should be of highest priority for all user groups. I think it's important that all tools available to maximize and maintain on the 'sustained yield principle.' As much as pre season forecasts might be fishery conservatively, it has been shown that there are better results by using 'in season', 'real time' data to create informed management decisions.

I oppose proposal 14

PROPOSAL 15

5 AAC 01.620. Lawful gear and gear specifications and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of monofilament or gillnet mesh in dip nets, as follows:

Prohibit the use of monofilament or gill net mesh material in dip nets used in the subsistence and personal use fisheries of the Upper Copper River District.

I support proposal 15

PROPOSAL 16

5 AAC 01.xxx. New Section and 5 AAC 77.xxx. New Section.

Require log books for all charters operating in personal use and subsistence fisheries, as follows:

A vessel for hire should keep a logbook recording the number of customers, the methods by which they fished, and the total number of each species caught.

I support proposal 16

Just as the commercial fisheries are closely monitored to collect data that makes for informed management decisions, so to would it be beneficial to collect data from other data sources., ie log books from personal use charter boat operators.

I support proposal 16

PROPOSAL 17

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Extend the lower boundary of the Chitina Subdistrict downstream to the Uranatina River, as follows:

(h) For the purposes of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina- McCarthy Bridge downstream **to an north/south line beginning at the mouth of the Uranatina River and crossing the Copper River as designated by ADF&G regulatory markers.**

I oppose proposal 17

The primary beneficiary of this proposal would most likely be the commercial component of the personal use fishery that can access this area,(ie river transport/guide boats). If most of the personal use fishers are catching their seasonal limit within the current area boundaries then why would there be a reason to extend these boundaries. Giving more access to boat fishers would likely increase Chinook capture rates, and perhaps negatively effect healthy salmon habitat with boat wakes, pollution, etc.

I oppose proposal 17

PROPOSAL 18

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Repeal the reduction in maximum harvest level in the Chitina Subdistrict Personal Use fishery when the Copper River commercial fishery is closed 13 or more consecutive days, as follows:

(f) The maximum harvest level for the Chitina Subdistrict personal use salmon fishery is 100,000 - 150,000 salmon, not including any salmon in excess of the in-river goal or salmon taken after August 31. [IF THE COPPER RIVER DISTRICT COMMERCIAL SALMON FISHERY IS CLOSED FOR 13 OR MORE CONSECUTIVE DAYS, THE MAXIMUM HARVEST LEVEL IN THE CHITINA SUB DISTRICT IS REDUCED TO 50,000 SALMON]

I oppose proposal 18



PROPOSAL 19

5 AAC 01.610. Fishing seasons.

Allow salmon to be taken for subsistence purposes at any time between May 1 and November 30 in the Copper River District, as follows:

I oppose proposal 19

Opening the Copper River District subsistence fishery for this extended period of time would make it extremely difficult to regulate and enforce. More commercial fishermen would take advantage of these extended dates, use their vessels to transport other subsistence users, and thus put more pressure on the Chinook resource especially in the early part of the season. I certainly support native access to the Copper River subsistence fishery; however, there are probably better alternatives to making this possible.

I oppose proposal 19

PROPOSAL 29

5 AAC 24.350. Closed waters.

Extend inside closure area to 1/4 mile off the southern shores of all barrier islands in the Copper River commercial drift gillnet salmon fishery, as follows:

(1) Extend the inside closure area to 1/4 mile off the southern shores of all barrier islands.

I oppose proposal 29

"Inside closures have proven only mildly effective at reducing incidental King harvest." The restrictions put in place these last few years to reduce king take must certainly be having an effect on the overall harvest of kings by the commercial fishery. It would be difficult to ascertain just how many kings are conserved with the utilization of inside closures, especially when there is coinciding time restrictions but it is common knowledge there would be a much greater king take if fishing were allowed in these areas. Pushing the fleet to 1/4 mile off shore would prove detrimental to the sockeye harvest and would cause tremendous economic hardship for Copper River fishermen.

I oppose proposal 29

PROPOSAL 31

5 AAC 24.331. Gillnet specifications and operations.

Reduce the maximum depth of drift gill nets in the Copper River District commercial drift gillnet salmon fishery to 29 meshes through the start of Statistical Week 24, as follows:

Reduce the maximum depth of gill nets fished through the start of Week 24 (end of May) to 29 meshes.

I oppose proposal 31

Most fishermen on the Copper River do not target King salmon. Financially it makes more sense to catch 100-200 sockeye compared to a handful of kings one might be lucky to catch on any given day. But trying to catch sockeye with a 29 mesh deep net just wouldn't be effective. There would be no incentive to fish if we couldn't cover expenses and most likely the fleet would stay tied up if this restriction was implemented.

I oppose proposal 31

PROPOSAL 32

5 AAC 24.361. Copper River King Salmon Management Plan.

Prohibit commercial salmon fishing in the Copper River District, during the month of May, if the preseason forecast for Copper River king salmon is below the 20-year average, or 35,000 king salmon, as follows:

If the preseason run forecast is below the 20-year average (or 35,000 Kings if a firm number is preferred), no commercial salmon fishing will occur in May (through start of Week 24). Commercial fishing may not open until Week 25 (first week of June).

I oppose proposal 32

The 2017 Copper River season is a perfect example of why the pre season forecast is not a viable method for predicting in-season numbers. With a weak pre season forecast for sockeyes, and an even weaker prediction for kings, ADF&G took a very conservative approach and limited time and area from the onset. And yet with the restrictions there appeared to be an abundance of kings, a much stronger run than the pre season forecast predicted. In the end the king closure restrictions remained in place and the king catch proved to be above everyone's expectations. Had there been a mandatory closure throughout May, there would have been no knowledge of the size of the king run, and only lost opportunity to show for it. Utilizing the commercial fishery as a tool to gauge run size or failure has always been one of ADF&G tools to manage the fishery using real time data. This scenario and how 2017 played out should be reason enough to

not put restrictions on the commercial fishery based on pre season forecasts.

I oppose proposal 32



PROPOSAL 33

5 AAC 24.361. Copper River King Salmon Management Plan.

Prohibit sale of commercially caught king salmon in the Copper River District if restrictions on Copper River drainage subsistence fisheries have been implemented, as follows:

I oppose proposal 33

PROPOSAL 34

5 AAC 24.310. Fishing seasons.

Prohibit commercial salmon fishing in the Copper River District until a salmon is recorded at the Copper River sonar, as follows:

I oppose proposal 34



Submitted By
Wendy W Robbins
Submitted On
11/15/2017 8:10:34 AM
Affiliation

I understand the Board is considering a change in the rules regarding dipnetting on the Chitina River. I am in ***favor*** of Proposals 10, 16, 17, 19, 20, 23, 25, 28. I ***oppose*** Proposals 13, 14, 15, 18, 36.

Thank you.

Wendy Robbins



Submitted By
William Markowitz
Submitted On
11/16/2017 1:19:57 PM
Affiliation

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I don't know if this is where I should be leaving comments for the upcoming board of fish but hopefully this will help convey the feelings of not only myself but others in the fleet: 1) The Cordova gillnet fleet is a small boat fleet 2) The current management practice of restricting commercial harvest of Copper River Sockeye to outside the barrier islands has put the fleet in harm's way causing 1 death, 1 overturned vessel as well as various other injuries 3) As a small boat operator I realize the choice is mine whether or not to fish during gale force winds or times of inclement weather, that being said I also have debts to pay as do many of my fellow fishermen 4) Restricting the fleet to outside the barrier islands has forced us fish in harm's way rather than in the protected and TRADITIONAL FISHING AREAS INSIDE THE BARRIER ISLANDS!! 5) The economic cost to the fleet and to the city of Cordova are staggering due to this restriction of fishing grounds I hope that my comments will be heard and help change the course of management of the Copper River fishery Regards, Bill Markowitz F/V Canvasback



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 14, 2017

John Jensen, Chair
Alaska Board of Fisheries
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

Subject: Comments on Proposals for December 2017 Prince William Sound Meeting

Dear Mr. Jensen:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 26 and 27, 2017. At this meeting, the SRC reviewed the proposals that will be considered at the December 2017 Prince William Sound meeting of the Alaska Board of Fisheries and would like to provide the following comments:

Proposal 10: Set an optimal escapement goal for Copper River sockeye salmon: The Wrangell-St. Elias SRC opposes Proposal 10. The escapement goal should be based on biological data whenever such data are available. Additionally, the Kenai River is different from the Copper River, and it does not make sense for the Copper River escapement goal to match the goal for the Kenai.

Proposal 13: Prohibit using a dip net from a boat to harvest salmon in the Glennallen Subdistrict: The Wrangell-St. Elias SRC supports Proposal 13 with modification to prohibit dip-netting from a boat in the Glennallen Subdistrict north of the Tonsina River. The commission is concerned about dip-netters targeting king salmon from boats, for example at the mouths of tributaries, when there are conservation concerns about king salmon.

Proposal 14: Modify the season dates for the Glennallen Subdistrict subsistence salmon fishery based on the preseason king salmon harvest projection: The Wrangell-St. Elias SRC supports Proposal 14 for reasons stated in the proposal. The commission submitted this proposal.

Proposal 15: Prohibit the use of monofilament or gillnet mesh in dip nets: The Wrangell-St. Elias SRC supports Proposal 15 for reasons stated in the proposal. The commission submitted this proposal.

Proposal 16: Require log books for all charters operating in personal use and subsistence fisheries: The Wrangell-St. Elias SRC supports Proposal 16. Requiring charter operators to maintain log books would provide information about whether personal use and subsistence fishermen are using a boats for hire.



Proposal 17: Extend the lower boundary of the Chitina Subdistrict downstream to the Uranatina River: The Wrangell-St. Elias SRC opposes Proposal 17. The commission is concerned that expanding the fishing area could result in increased harvest. In years of low returns, this could affect escapement.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Daniel E. Stevens".

Daniel E. Stevens
Chair