



## **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 1<sup>st</sup> 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  
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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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11/17/2017 9:35:49 AM  
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I support Proposal 10.

This allows better management of both species of salmon.

Thank you,

Damien Delzer

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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.

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11/17/2017 9:40:24 AM  
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I oppose Proposal 15.

It would be harmful to families to ban monofilament nets.



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11/17/2017 9:41:28 AM  
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I oppose Proposal 16.

User permits provide detailed Harvest information already.

Submitted By  
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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  
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11/17/2017 10:04:33 AM  
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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  
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**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 week 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 models 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 legal. 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 and 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 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 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 stock sockeye 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  
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11/16/2017 10:40:53 PM  
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Drift gilnett operator

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#### 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  
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11/16/2017 10:29:14 PM  
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#### 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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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  
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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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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  
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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

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PC25  
1 of 9

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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

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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 they 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  
1171 Albro Gregory Lane  
Faribanks, Alaska 99712



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  
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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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 haul 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 management 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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Submitted On  
11/14/2017 8:16:05 AM  
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Cordova , Alaska 99574

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  
Janet Hawi  
Submitted On  
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  
Jennifer M Moser  
Submitted On  
11/14/2017 11:25:25 PM  
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I do not support restrictions on netting 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 subsistence 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



Submitted By  
Jesse Harris  
Submitted On  
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  
Joann Thomas  
Submitted On  
11/17/2017 1:26:56 PM  
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PWS Setnetter

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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  
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Submitted On  
11/15/2017 8:46:33 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



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  
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11/11/2017 4:42:46 PM  
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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

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## 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.



Submitted By  
Jon Biltz  
Submitted On  
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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11715 Wilderness Drive  
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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  
Justin Cornett  
Submitted On  
11/15/2017 9:32:08 AM  
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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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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.**



Submitted By  
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Submitted On  
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  
Affiliation  
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  
lily cole  
Submitted On  
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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**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 fishermans 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 lead 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 remaining 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 their 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 problems 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 subsistence 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.

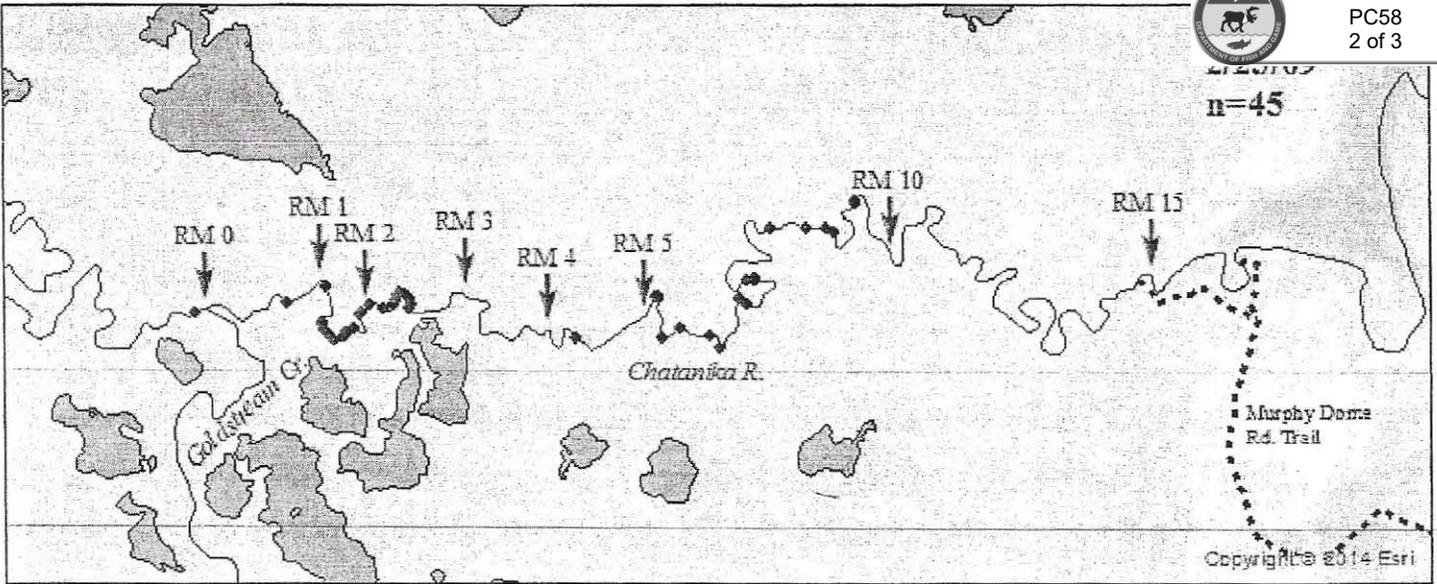
This ACR was crafted and presented at the April 5, 2017 Fairbanks Fish & Game Advisory Committee meeting by an ice fishing member of the Board. Only two members of the public attended and spoke in support of this ACR.

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.

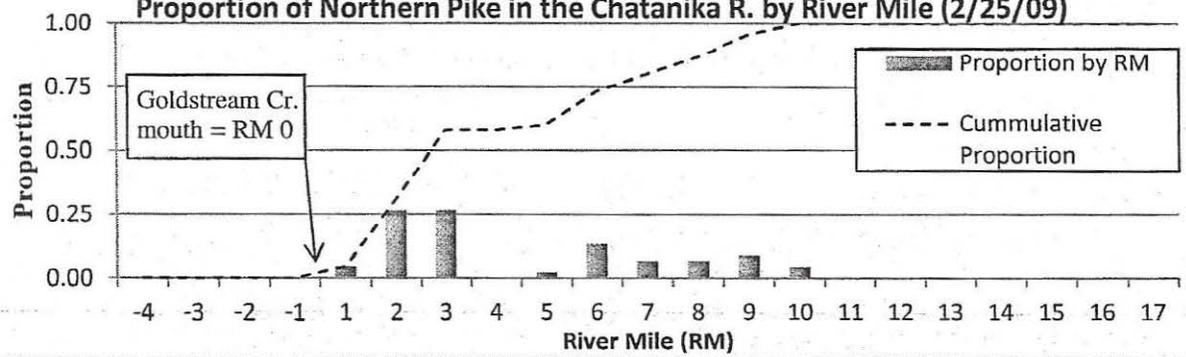
Marv Hassebroek



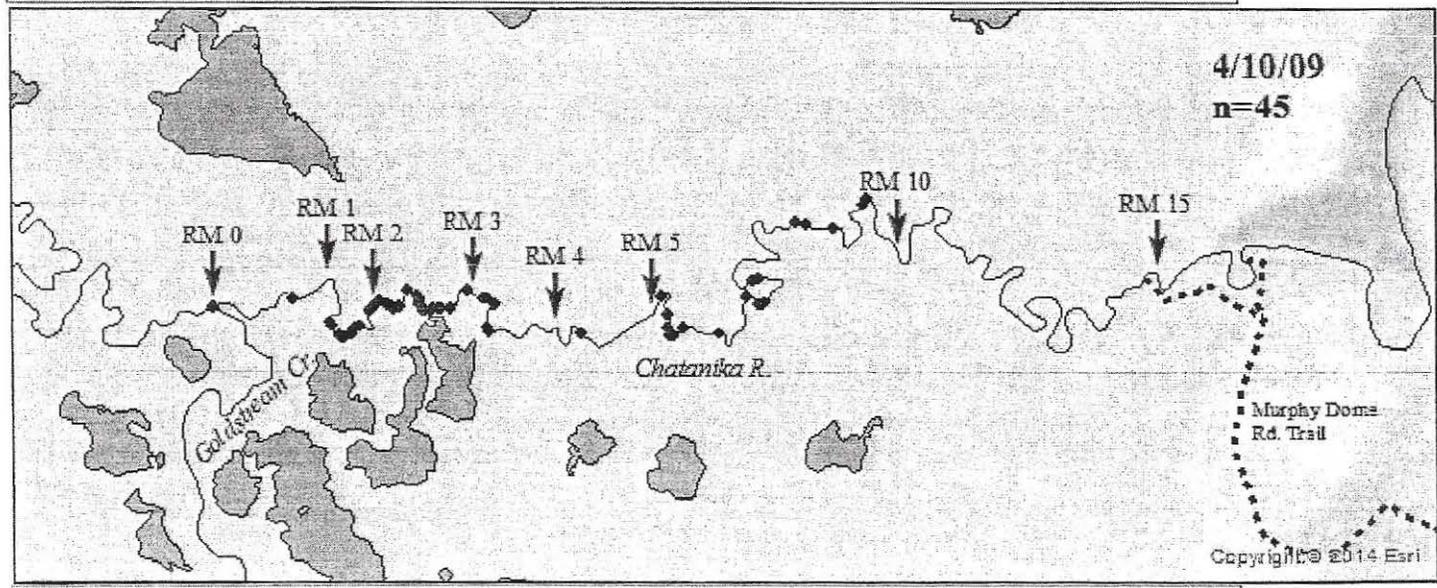
2/25/09  
n=45



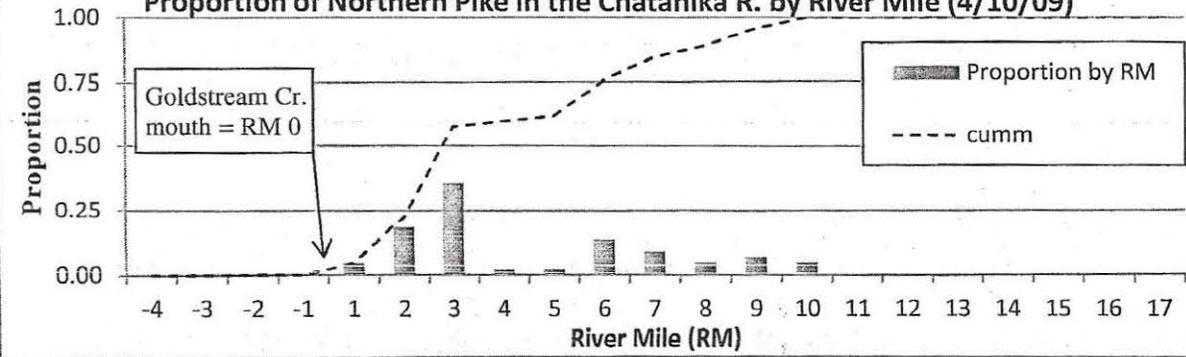
**Proportion of Northern Pike in the Chatanika R. by River Mile (2/25/09)**



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

**T**HE 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.

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)

A trophy photo taken from "Pike Slough."



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



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 Statute. It’s clear that the statement, “shall be performed or assisted” is defined by and subordinate to the language of the Alaska Statute 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  
Affiliation

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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 Harvest 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 existing 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 portrays 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 few years, 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.

--

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.

Poposal 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 utelized 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**

2

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**



## Table of Contents

**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.