

RC7

November 30, 2017

Chairman John Jensen
Alaska Board of Fisheries
Board Support Section
PO Box 115526
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RE: Comments on 2017 Finfish proposals 47, 48 and 49.

I have been involved most if not all PWS fisheries during my career for the last 50 years. I have served on the PWS/CR advisory committee, BOF working groups, participated in the BOF process for the last 40 years and served on the PWSAC Board for 18 years. My main source of income is the drift fishery.

My comments today are my own.

On **proposal 49**: As the author of this proposal I **SUPPORT** it and **proposal 48** I **OPPOSE**.

When I refer to ADF&G I am referring to ADF&G leadership not local staff. And when I refer to PWSAC I am referring to PWSAC leadership.

The regulation in the PWS Management and Allocation Plan that closes the SW District prior to July 18th was put in the plan for several reasons. The prior to July 18th date is the historic date in that there was no fishery in the SW district prior to enhanced salmon. It was known that fishing on enhanced fish in the SW district prior to that date would have detrimental effects on the early run timing wild stocks retuning to northern PWS. And finally, it was put in the allocation plan to give clear passage to and protect the fish allocated the drift and set net fishery's. The Prince William Sound Management and Salmon Enhancement Allocation Plan is **both** a management plan and salmon enhancement allocation plan.

In the development, approval, and prosecution of the AFK chum fishery we have more questions than answers.

Are BOF regulations just guidelines or recommendations that can be ignored to fit an agenda?

Can everyone read a regulation the says that the Southwestern District is closed to salmon fishing prior to July 18 and interpret that it means that it means something else?

Can the persons at ADF&G responsible for the approval of the AFK chum release permit not conform their own regulations that state that "The harvest of salmon inhabiting the water of

the state, regardless of whether the salmon are naturally or artificially propagated, may be conducted **only** pursuant to regulations adopted by the Board of Fisheries”?

Why was this small remote release fishery afforded maximum fishing time and beyond the legal area of the Special Harvest Area that maximized the interception of salmon migrating north to other districts?

Why would ADF&G and the Regional Planning Team ignore my requests to follow the regulations and continue to approve the AFK chum remote release permit?

Why would PWSAC continue to violate their own Board Policy on allocation and ignore my repeated requests to acknowledge them?

Why would PWSAC expunge my comments on the legality and detrimental effects of the AFK chum fishery from their Planning and Production Committee meeting minutes and do nothing about it when I requested them to do so?

Why would ADF&G blame the Board of Fisheries for the current situation they find their selves in?

Why would ADF&G and PWSAC support an allocative proposal that seeks to cover their actions?

Hopefully at this meeting we will have answers to some of these questions.

I would like to clear up some of the miss information provided at this meeting by ADF&G and PWSAC.

In 2003 when the 17 million chum eggs were approved for release at AFK the intent was for a new seine fishery in closed waters, not a cost recovery fishery as claimed by ADF&G in their staff comments. It clearly states that in the 2003 AFK annual management plan and in the 2017 AFK permit alteration request. PWSAC has submitted testimony that “PWSAC has the intention of replacing the chum salmon being stocked at AFK hatchery with pink salmon”. PWSAC will only do that if ADF&G approves a 27 million pink salmon increase above historic levels. ADF&G has concerns with managing the AFK pink fishery at the current level of 190 million eggs that they just increased it to this spring. AFK went from 162 million pink eggs to 190 million eggs this summer. ADF&G may never approve the full increase of 217 million eggs. The full 34 million chum eggs are still on the AFK permit and PWSAC and ADF&G have no intention removing any portion of them from the permit.

Other information the BOF might find useful is that the AFK chums will be returning for 6 years after the release is eliminated. The PWSAC Planning and Production Committee has determined that the both the Port Chalmers and AFK chum remote releases are not cost effective. The cost for PWSAC to run these two programs are around one million dollars.

Clearly by the testimony and written comments here at this meeting by ADF&G and PWSAC, they still don't get it. The BOF has the authority to allocate the salmon resources of the state, not them. PWSAC and ADF&G wants the BOF to approve an allocative proposal to make their actions legal. PWSAC Board President Tim Moore comments on PWSAC letter head was not approved by the PWSAC board and he does not speak for the PWS drift and set net fleet.

The PWS drift and set net fisherman want the interception of salmon stocks allocated to them to cease.

Proposal 47: As the author of this proposal I **SUPPORT** it:

The first paragraph of the management plan states that:

"The purpose of the management and allocation plan contained in this section is to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial fisheries, and to reduce conflicts between these user groups. It is the intent of the Board of Fisheries (board) to allocate enhanced salmon stocks in the Prince William Sound Area to maintain the long-term historic balance between competing commercial users that has existed since statehood, while acknowledging developments in the fisheries that have occurred since this plan went into effect in 1991".

The plan has the long-term historic percentages of 50/50 in it, but lacks the full value of the **"enhanced salmon stocks in the Prince William Sound Area"**.

By leaving out VFDA hatchery's value from the plan there is no way the plan can **"maintain the long-term historic balance between competing commercial users that has existed since statehood"**. The last ten years the seine fleet has enjoyed a robust harvest of 421 million dollars in enhanced salmon while the drift fleet has harvested 207 million dollars in enhanced salmon.

The BOF working group that developed this version of the plan had VFDA in it, as you can tell by the language in the first paragraph.

The plan as written is flawed, and the fatal flaw is that VFDA was pulled out of the plan by putting in part **"(j) In this section, "enhanced salmon stocks" means salmon produced by the Prince William Sound Aquaculture Corporation"** at the end of the plan. This was added hours before the BOF voted on it. The time has come to review this one-sided allocation plan and **"to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial fisheries"**.

Thank You,
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