

Submitted By
Rodger Painter
Submitted On
9/21/2018 9:15:02 PM
Affiliation
Independant

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I have been a close follower of Alaska's salmon hatchery program since it was first proposed during the Hammond years, as a reporter, executive director of UFA and later as an advocate for shellfish aquaculture. Salmon hatcheries have proven to be one of the best investment's the state has ever made. The economic return on investment is phenomenal, and they are vital to the future of many coastal communities. However, more is not always the best decision when considering the overall impacts to the marine environment. For instance, I understand there is evidence that the gut-balls of pink salmon showed a high percentage of shellfish larvae. This comes at a time when hardshell clam resources throughout the Gulf of Alaska are in serious decline. I am currently involved in my retirement years as a consultant to clam recovery research in Cook Inlet and Prince William Sound. These are complex issues where the whole ecosystem needs to taken into account. I am a member of the seafood industry, but I also trace my Alaska roots back to Aleuts, Athabaskan, Russian and the ennicity of other sailors or miners who stepped ashore. Pay attention to the health of our marine resources, not the politics of the moment.

October 3, 2018

Board of Fisheries
P.O. Box 115526
Juneau, AK 99811
dfg.bof.comments@alaska.gov

RE: October 15-16 Work Session

Dear Board of Fisheries,

Thank you for your service to Alaska, the amount of time and energy you put into making fisheries management decisions for our state is significant and we appreciate your dedication. We are writing to express our concern over the state's declining runs of salmon, and the domino of impacts that struggling salmon runs have on individuals, businesses, local and state economies and indigenous culture.

Trout Unlimited, is the nation's largest sportsmen's organization dedicated to cold-water conservation with more than 400 chapters and more than 300,000 active members across the country. Here in Alaska, TU has roughly 22,000 members and supporters. We have 8 Alaskan staff and TU has chapters in Juneau, on the Kenai Peninsula, in Anchorage and the Mat-Su Valley, and in Fairbanks. TU has more than 65 business supporters in Alaska, in addition to many of our individual members. These anglers and recreational fishing and hunting businesses rely on the important fish, wildlife and water resources found in the Bristol Bay region for fishing, hunting, subsistence, recreation, and for employment in related industries.

We know that myriad factors are likely contributing to the decline of our valuable wild salmon, and while there might not be one single obvious way to turn things around, history shows that continuing down our current path will lead us to fighting over Alaska's last fish. We are interested in brighter future for our wild salmon and think that the Board of Fisheries plays a key role in shaping that future. We urge the Board of Fisheries to keep the following in mind when making decisions:

- Let's take care of our wild salmon stocks first. We are the last state in the country where wild salmon still thrive. They are highly sought- after fish and contribute a significant amount to our state economy. As is laid out in the Sustainable Salmon Policy the Board of Fisheries and Alaska Department of Fish and Game recognize that, "*effects and*

Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization

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(907) 770-1776 • www.tu.org



interactions of introduced or enhanced salmon stocks on wild salmon stocks should be assessed; wild salmon stocks and fisheries on those stocks should be protected from adverse impacts from artificial propagation and enhancement efforts;” Hatcheries should be sized appropriately depending on carrying capacity, shouldn't negatively impact wild stocks, and science should be driving how they are managed.

- Let's not make things any worse. If we need to make temporary harvest reductions and not increase hatchery production until we have a better information upon which to make informed, science-based management decisions, so be it. While there might be short-term challenges inherent in doing so, the long-term benefit will be well worth it.

The issues put before the Board are often short-term, highly specified or geographically targeted and while we understand the need for board action on them, we encourage the Board of Fisheries to take a more comprehensive and proactive role in addressing some of the larger, long-term issues facing salmon in Alaska. Your leadership, expertise and energy are needed to address these complex issues. Tackling them will likely require creative new perspectives and changing the way salmon decisions in Alaska are typically made.

Nearly all Alaskans, regardless of what type of gear is used to fish with, are concerned about the state of our salmon – and certainly something that should be forefront in the minds of Board of Fisheries members when making decisions about salmon. We encourage the board not to grant any new increases in hatchery production until a better understanding of the situation is gained. If we want Alaska's prized salmon around for the long haul we need to acknowledge the complexity of the circumstances and take a wholistic, collaborative approach to the challenges facing them.

Sincerely,

Nelli Williams
Alaska Director – Trout Unlimited
nwilliams@tu.org

Submitted By
Morgan Barrowcliff
Submitted On
10/3/2018 11:46:52 PM
Affiliation
Homer Spit Properties LLC

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This comment is intended to supplement our Agenda Change Request, number 5, submitted in regards to closing the barge basin at the Homer Spit Marine Terminal to sport fishing. The reasons and motivations are described in the ACR itself and here I am primarily addressing the ADF&G staff comments regarding our request. Primarily the following paragraph:

Language from the permits issued for the Homer Spit Marine Terminal barge basin by the Army Corp of Engineers in 1970 and 1976 states "That this instrument does not convey any property rights, either in real estate or material, or any exclusive privileges; and does not authorize any injury to property or invasion of rights or any infringement of Federal, State, or local laws or regulations, nor did it obviate the requirement to obtain State or local assent required by law for the activity authorized herein." Additionally, the permit stipulates "That no attempt shall be made by the permittee to forbid the full and free use by the public of all navigable waters at or adjacent to the activity authorized by this permit."

Although I cannot speak as to the intentions of department staff, the clear implication seems to be that they believe this language in a permitting letter from the Corp of Engineers somehow applies to the current request at hand so I will attempt to address the somewhat complicated question of property rights as they pertain to a man-made body of water constructed well after statehood. To begin with, the initial statement *"That this instrument does not convey any property rights... ..nor did it obviate the requirement to obtain State or local assent required by law for the activity authorized herein."* is routine permitting language present on every permit issued by the Corp of Engineers. The permit in question is not giving property rights, the property and title rights to the land that was to become the barge basin were never in question and are currently held without challenge by Homer Spit Properties LLC. As some may be aware, in general in the state of Alaska, title rights to "Navigable Waters" are in fact held by the state, however this case is a very clear cut one in regards to "title navigability". It is both man-made, and it was not navigable at statehood. This barge basin, while being navigable, is owned by Homer Spit Properties LLC. All **land** involved is private property, this includes the bottom of the basin and all intertidal lands. For contrast if you compare this to the East Side Beach immediately adjacent, that land is only private above the mean high tide line. In practice this means that a member of the public has access only to the water in the basin itself. Dropping an anchor, or any contact with the shore, is trespassing.

As to the second statement from the permit. *"That no attempt shall be made by the permittee to forbid the full and free use by the public of all navigable waters at or adjacent to the activity authorized by this permit."* This also is fairly standard permitting conditions and in context of a permit for initial construction of the barge basin would not have even been meant to apply to the barge basin itself which was actually a more or less undeveloped lot at the time. It would be a reference to obstructing Navigability of existing waterways during the construction of the basin. Furthermore, a public right to navigability of water has absolutely nothing to do with whether they can sportfish in it, it is solely a right to travel and passageway. All sport fishing regulations, restrictions, and yes even closures take place in navigable waters by default and none of them are restrictions of **navigability**. Even if closed to sportfishing, the public would still maintain right of passage over the water. We are not contesting this, or the state's right to administer sportfishing regulations for this water, but the quotes taken from the routine disclaimers made in the coversheet of a 40 year old permit did not appear to properly convey the reality of the situation.

We still feel strongly that is simply not an appropriate place for public sportfishing to occur. The increase in Department released Coho Salmon present on the east side of the spit has increased significantly in recent years and current regulations are insufficient. Exacerbating the problem this summer was both local sporting good stores and Department of Fish and Game staff recommending the basin as a fishing location and incorrectly informing people as to the property status of the intertidal waters. The overwhelming majority of fishing that took place was trespass, and it was a full time job for three weeks this summer asking people to leave and attempting to keep the property clear. Homer police assisted as they were able but they are not available to be there all the time and many people returned multiple times after being requested to leave the property. It remains a commercial property, and is not a safe spot for a family salmon fishing outing. Any assistance the Board can offer on this matter would be greatly appreciated.

Submitted By
Paul A. Shadura II
Submitted On
10/3/2018 11:57:37 PM
Affiliation

SOKI Will be submitting comments on ACR 6 prior to the October Worksession.

Please note that **5 AAC 39.220 Policy for the management of mixed stock salmon fisheries.**

(b) In the absence of a regulatory management plan that otherwise allocates or restricts harvest, and when it is necessary to restrict fisheries on stocks where there are known conservation problems, **the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern. *The board recognized that precise sharing of conservation among fisheries is dependent on the amount of stock-specific information available.***

SOKI requests the Board to review the in-season management assessment tools available for precautionary management of the Kenai River sockeye personal use fishery. The Department closed the PU fishery in July for conservation concerns yet did not stipulate what savings or what assessment tools or models were used to determine the rate of harvest or savings.

Our proposal asks for guidance for runs of Kenai River sockeye under 2.3 million and how the PU fishery will be managed for 39.222 (f) (4).

Thank you,

Submitted by Paul A. Shadura II, spokesperson for SOKI

Submitted By
E Bies
Submitted On
9/28/2018 4:19:23 PM
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Resident

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I strongly disagree with prp# 6 please don't take away from dipnetters if you need two restrict then restrict the commercial fleet thank you

Submitted By

Joseph Person

Submitted On

10/3/2018 11:59:40 PM

Affiliation

Kenai Peninsula Fishermen's Association

This comment is in regards to Agenda Change Request 6 pertaining to the giving of more in-season emergency order authority to the Department to manage the personal use fisheries on the Kenai and Kasilof Rivers, and to require daily reporting of harvest in these fisheries.

The Kenai Peninsula Fishermen's Association board voted to support this ACR and feels that there are multiple facets of the question worthy of discussion. The current lack of flexibility for the department offers them no "step downs" or in between measures to slow down harvest in the fishery short of a full closure. In times of low abundance this can result in them being required to close the fishery entirely as they did this year. Some sort of intermediary measures would allow them to hopefully keep it open for the entirety of the season and allow continued opportunity while sharing in the burden of the conservation as a significant user group of the resource.

The second component of the ACR, the daily reporting, is something that will inevitably have to be addressed at some point. The current situation in sport and personal use fisheries in the state where no real harvest data is available until months after the close of the affected seasons is completely untenable. Daily reporting would be difficult to achieve in an instant, but some sort of inseason reporting is absolutely required. Across multiple fisheries the Department holds a position that it "can't be done" and I am not really satisfied with that position. Game management across the state is done on a real time basis and many hunts require 3 day reporting. We cannot continue to manage sport fisheries in the way we have been for years, and something will have to change at some point.

Joseph Person

Submitted By
Richard Person
Submitted On
10/2/2018 3:06:46 PM
Affiliation
east side setnetter

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All UCI salmon fisheries should have adequate regulation in the hands of the managers to allow for useful in-season management. As stated in ACR 6, the PU fisheries for the Kenai and Kasilof Rivers do not. **Step down measures are a reasonable addition to managing these fisheries.**

In season reporting of harvest will assist managers of all departments in overall evaluation of run strength particularly in years with smaller returns.

I encourage you to accept ACR 6 and use it to improve the management of these to rivers for the benefit of all users.

Submitted By
Amber and Travis Every
Submitted On
9/30/2018 11:02:40 AM
Affiliation

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Dear Members of the Alaska Board of Fisheries,

We have a commercial fishing set net operation located on North K-Beach. In March 2017 the BOF passed a 600 ft fishery on North K-Beach to help harvest surplus Kasilof sockeye. This 600 ft fishery consists of **29 Beach nets**, 9 family commercial fishing operations. The board passed this proposal with a 7-0 vote.

During the 2017 season, this fishery was not used one time. The Kasilof River exceeded the BEG of 160,000-340,000. North K-Beach fisherman had many conversations with ADF&G in season to figure out why this fishery was not used. Pat Shields from ADF&G stated there was a lot of confusion on this fishery. In March 2018 North KBeach fisherman decided to put in an ACR to help clarify the confusion. At that meeting Board member Ruffner states "I have stated my intent of the proposal several times on the record, I was looking for an option that would help you stay within the escapement goals and not have to resort to using the special harvest terminal fishery".

During the 2018 season, this fishery was used two times. The Kasilof River exceeded the BEG and the OEG of 160,000-390,000 and the special harvest terminal fishery was used. The North K-Beach 600ft fishery could have been used multiple times but once again Pat Shields states there was confusion.

ACR 7 will help ADF&G clarify the use of this 600ft fishery. The last two seasons North K-Beach fishermen have lost the ability to harvest an available surplus which has resulted in exceeding escapement goals and significant economic loss.

Thank you for your time,

Amber & Travis Every

Submitted By
Brian and Lisa Gabriel
Submitted On
10/3/2018 2:40:03 PM
Affiliation
Eastside Setnetters

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October 3, 2018

ATTN: BOF COMMENTS
Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

Mr. Chairman,

We are Setnetters on Upper K-Beach in the Kenai Section (Statistical Area 244-32) of Upper Cook Inlet. **We are asking for your support for ACR7, which you will be considering at the Work Session on October 15-16, 2018 in Anchorage.**

ACR7 is asking to clarify that the "hours used" in the North Kalifornsky Beach (NKB) set gillnet 600 foot fishery should be **exempt** from the weekly emergency order (EO) restrictive provision in the Kenai River Late-Run King Salmon Management Plan (5 AAC 21.359) and the Kenai River Sockeye Management Plan (AAC 21.360).

The 600ft North Kalifornsky Beach fishery was adopted in 2017 at the Upper Cook Inlet Finfish meeting in Anchorage as Proposal 136. Proposal 136 was supported unanimously by the board with a 7-0 vote.

During the 2017 fishing season, the regulation was not used. During the 2018 fishing season, it was used twice. When the regulation was used in the 2018 season, the department concluded that since the hours used during the 600 foot North K-Beach fishery were **NOT** differentiated by the board, they would count against **all** EO hours used in the current plan. So, when the 600 foot North K-Beach fishery was used, the remainder of the fishing sections were penalized by having their fishing hours reduced. This interpretation is the reason for ACR 7.

During the 2017 BOF meeting, Proposal 136 was discussed very thoroughly, and several times it was stated by board members that the fishery should be used like the Kasilof Section 600 foot fishery to avoid using the Kenai River Special Harvest Area. After the adoption of Proposal 136, the board took up Proposal 101, which asked the board to **REMOVE** the "hours used" restriction in the Kasilof 600 foot fishery. The board approved Proposal 101 but did not go back and re-visit Proposal 136 to remove the "hours used" restrictions in the Kenai River 600 foot fishery.

With the restrictions in the plan, the local Department was very hesitant to use the North K-Beach 600 foot fishery in the 2018 season because it limited their ability to use the entire fishery to harvest surplus sockeye headed to the Kenai River. They used the 600 foot Kasilof fishery several times in 2018 season and still opened the Kasilof River Special Harvest Area to harvest surplus salmon headed to the Kasilof River. In 2018 with all three provisions used, the Kasilof River still exceeded the BEG and the OEG of 160,000-390,000.

We believe it was the boards intent, as stated several times during deliberations, to model the Kenai Section 600 foot fishery with the Kasilof Section 600 foot fishery, and that by the board not defining the "hours used" in the Kenai Section 600 foot fishery, their desired intent has not been accomplished. We ask that the corrective action carry forward with the approval of ACR 7.

Thank you for your consideration,

Brian and Lisa Gabriel

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Submitted By
Chris Every
Submitted On
10/2/2018 1:42:36 PM
Affiliation

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Kenai, Alaska 99611

Members of the Board of Fish,

I support ACR #7.

I am asking the board to help clarify this regulation and allow North Kalifornsky Beach (NKB) to fish this 600' fishery when there is a harvestable surplus of Kasilof red salmon.

Chris Every

Submitted By
Gary L. Hollier
Submitted On
10/1/2018 9:12:47 PM
Affiliation
NKB settnetter

These comments pertain to ACR #7. I am settnetter on North Kalifonsky Beach statistical area 244-32, in Cook Inlet. I have fished there since 1971. I submitted proposal 136 at the 2017 Upper Cook Inlet BOF meeting. The BOF passed 7-0 amended 136. Basically this proposal asked to may let NKB settnetters fish beach nets up to 600 ft from mean high water when the Kasilof Section was fishing on or after July 8. Genetic studies by ADF&G have shown that Kasilof stocks are abundant on North Kalifonsky beaches most of the season. This area for decades has traditionally harvested these Kasilof stocks. Due to management changes in 1999, NKB was severally restricted to have the ability to harvest Kasilof stocks. When the BOF passed amended 136 the intent was to let NKB harvest Kasilof stocks to help keep the Kasilof stocks within their management goals and more importantly not have to use the Kasilof River Special Harvest area. In 2018 the Kasilof BEG and OEG was exceeded for sockeye, resulting in the opening of the Kasilof Special Harvest Area. In 2017 this regulation was not used. In 2018 it was used twice. It could have been used more, except ADF&G managers did not have clear intent from the BOF and thus concluded that any hours fished in the 600 ft fishery would count toward hours for the entire section. As the proposer of 136 this certainly was not my intent. In 2018 there were 149 set net permits (447 nets) registered in the Kenai section. The 600 ft fishery on NKB totals 29 beach nets, or 10 permits. It definitely was a unintended consequence of this regulation that the whole section's hours would count when 10 permits were fishing limited time and area. I would like the BOF to pass ACR 7 and give clear intent to ADF&G that hours fished in the 600 ft fishery on NKB would not count for hours fished in the Kenai River Sockeye and King salmon management plans. This would be similar to the exemption for the hours in the 600 ft. fishery in the Kasilof section. Thank you, Gary L. Hollier Kenai, Ak.

Submitted By
Greg Johnson
Submitted On
10/2/2018 9:20:26 PM
Affiliation

Chair Jensen and Board Members

I would like to lend my support to ACR 7 . My family fishes just North of the Blanchard Line in the North KBeach Subsection(244-32). We hold six Cook Inlet setnet Permits three of the Nets we fish are within the 600 ft. referenced in this ACR. The majority of our fish site is closer to the Kasilof River than it is to the Kenai River. I have attended four Upper Cook Inlet BOF meetings in an attempt to gain some directed opportunity on Kasilof Sockeye. The 600 foot fishery that was adopted at the last UCI board cycle was both conservative and directed at providing access to Kasilof Sockeye. It is critical that any hours fished within 600 ft in the North KBeach subsection not be included in the weekly hourly limitation. Inclusion of hours fished in the weekly hours limitation has lead to not utilizing this area the past two years

Thank for your consideration. Greg Johnson and Family

Submitted By
JoAnn Wichers
Submitted On
10/3/2018 5:42:14 PM
Affiliation

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I support ACR7. This will clear up the original intent of this regulation. My husband, myself and our two sons are set net commercial fisherman in North K-Beach. Our family have been set netters in this area for over 30 years. Last year we had the opportunity to harvest surplus fish using the 600 feet set net fishery, but we were shut down early because of the ambiguous nature of the regulation which caused our local fish and game to link it to the entire Kenai section. ACR7 will clear up any confusion that local fish and game authority would have on hours used.

Submitted By
Andy Hall
Submitted On
10/3/2018 9:23:25 AM
Affiliation
Kenai Peninsula Fishermen's Association

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October 1, 2018

ATTN: BOF COMMENTS
Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

Mr. Chairman,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited entry permit holders. We also include other Cook Inlet (CI) gear types, crewmembers, fish processors, local businesses and general interest in our membership.

KPFA submits these comments in support of ACR 7, for consideration by the Board at its Work Session in Anchorage October 15-16, 2018.

During the 2017 Upper Cook Inlet Finfish meeting in Anchorage, the Board deliberated on Proposal 136, which sought to create a fishery within 600 feet of the mean high tide mark on North KBeach in the Kenai Section (Statistical Area 244-32), which may be used in conjunction with openings occurring in the Kasilof section. After discussion and debate during that meeting, the Board unanimously passed Proposal 136 with a 7-0 vote.

Subsequent to the meeting, the question arose regarding the hours fished during the 600 foot fishery in the Kenai Section and their application to the hours fished by the entire Kenai section. For example, if the Kenai section had a weekly compliment of 36 hours which could be used within the plan, and the Upper KBeach 600 ft. fishery were to open during that week, would those hours be deducted from the entire Kenai section's compliment of hours?

After reviewing the recording of the 2017 meeting, the question of application of hours, though inferred, was not specifically mentioned. This summer, the local Department of Fish and Game Commercial Fish Biologist referred the question to the Department of Law for direction. The apparent conclusion was that if the application of hours was not specifically adopted by the Board, then the hours fished were to be attributed to the entire Kenai section hours allotted in the plan.

This conclusion seems incongruous with the way the 600 foot fishery is prosecuted in the Kasilof section. Since the 2017 BOF meeting, those hours fished are NOT attributed to the entire section. When the hours fished in the Kenai section are counted towards all, it inhibits the use of this important 600 foot tool. It was stated numerous times during deliberations on Proposal 136 that they wanted to model it the same as the Kasilof 600 foot fishery, which in the 2017 BOF meeting, removed the hours restrictions when the board approved Proposal 101 at a later date in the meeting. Proposal 136 was not re-visited after Proposal 101 was passed. It is our contention that the omission of "hours used language" was an oversight by the Board when it passed Proposal 101 and then did not re-visit proposal 136.

Should the Board not entertain ACR 7 it will reduce potential use of this valuable tool intended to help harvest excess Kasilof sockeye. A further benefit, which the Board did discuss, was that by using the Upper K-Beach 600 foot option, an opening in the Kasilof River Special Harvest Area was less likely to occur.

Therefore, KPFA supports ACR 7 and urges the Board to take corrective action relative to "hours used" in the North K-Beach 600 foot fishery in stat area 244-32.

Thank you,

Andy Hall, President

Kenai Peninsula Fishermen's Association

Submitted By
Pat Zurfluh
Submitted On
9/18/2018 10:11:59 AM
Affiliation
NKB Fisherman

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Scottsdale , Arizona 85250

I support ACR 7 proposed by Gary Hollier. I fish just outside of the 600 foot area and was only allowed 3 days of fishing in 2018. I agreed this area should not go against my fishing time for Kenai Sockeye, since it is primarily a Kasilof fishery. Please modify as he requested.

From: Sarah Hollier
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: BOF comment ACR
Date: Wednesday, September 19, 2018 5:17:49 PM

Board Members,

I am in favor of Gary Hollier's ACR, which as described; "Hours used in NKB set gillnet 600 ft fishery should be exempt for weekly EO hours in 5 AAC 21.359 or 5 AAC 21.360"

Time spend in the 600 ft fishery targeting Kasilof River fish, I feel should not count towards time used in the same sub-unit(district) intended for targeting Kenai River fish. In the 244-32 fishing district, any tool available used to target the over plentiful run, Kenai or Kasilof, I fell shall be taken into consideration and utilized to its maximum potential as intended.

Respectively,
Sarah Pellegrom
(907) 252-6316

Submitted By
Alan Otness
Submitted On
10/1/2018 6:10:41 PM
Affiliation

Dear Board of Fisheries

I am writing in opposition to the agenda change request to consider closing the Sitka sound sac roe herring fishery. I would like to see why the subsistence herring needs have not been met. In order for anyone to evaluate whether this is an accurate statement I would like to have the data that supports this. I believe that an issue like this needs to be debated during a normal board cycle.

Sincerely

Alan Otness

Submitted By
alannah alber
Submitted On
10/3/2018 4:24:33 PM
Affiliation
crew member

i am writing to let my opposition to ARC 10 be known, the sitka sac roe fishery is one of the healthiest fisheries in the state of alaska, it is a big part of my income as well as many other crew members and Sitka residents, It would be wrong to not have this fishery because tribal members dont harvest their susistance quota, We should explore other solutions to the problem.



ALASKA GENERAL SEAFOODS

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October 3, 2018

Alaska Board of Fisheries
Attn: Chairman John Jensen

Re: ACR 10 – Close Sitka Sound commercial sac roe herring fishery.

Chairman Jensen and Board Members:

In January, Alaska General Seafoods commented on many of the proposals regarding the Sitka Sound sac roe fishery.

ACR 10 has the same theme as some of those January proposals that sought to modify the way the fishery is managed. At the January meeting, ADF&G presented, one more time, to the Board and public, its efforts to manage the fishery around subsistence needs and conservation concerns. The Board took action to close more area to address subsistence issues at that time. **We urge that further action is not needed.**

Management of the Sitka Sound sac roe fishery by ADF&G is conservative and based on sound scientific information to evaluate and manage the fishery. As a processor, we are fully dependent on sustainable management to carry Alaska's fisheries into the future. ACR 10 does not provide the adequate science based reasons for the authors request to close the fishery. **We oppose any action on ACR 10.**

Thank you for the opportunity to present our comments.

Sincerely,

Sandy Souter
Manager – Fishing Operations
Alaska General Seafoods Inc.

Submitted By
cassidy alber
Submitted On
10/3/2018 4:24:12 PM
Affiliation
crew member

i am writing to let my opposition to ARC 10 be known, the sitka sac roe fishery is one of the healthiest fisheries in the state of alaska, it is a big part of my income as well as many other crew members and Sitka residents, It would be wrong to not have this fishery because tribal members dont harvest their susitance quota, We should explore other solutions to the problem.



Charles P. Fogle
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October 3, 2018

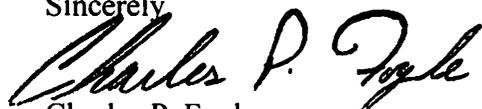
John Jensen, Chairman
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Mr. Jensen and Members of the Board:

As a Southeast Alaska herring seine sac roe permit holder, I am requesting that you reject ACR 10 since it clearly does not comply with the requirements of 5 AAC 39.999 'Policy for changing board agenda'. As noted by RC2, Staff Comments, a) there is **no** fishery conservation purpose or reason; b) it does **not** correct an error in regulation; c) the agenda change request does **not** address an effect of a regulation on a fishery that was unforeseen when that regulation was adopted. The proposers' claim that there is a conservation purpose or unforeseen effect is not backed up with any previously unreviewed information by this board and many previous boards.

Since the board reviewed the fishery in-cycle during the January 2018 SE finfish meeting in Sitka, the only new information available would be the 2018 harvest information and spawn data. The proposal is also allocative in its nature claiming that the "Subsistence availability has collapsed...". The board 'not accept' ACR10 under section(a) part (2) of the 'Policy'.

Sincerely,


Charles P. Fogle

Submitted By
Clyde Curry
Submitted On
10/3/2018 5:22:06 PM
Affiliation
Fisherman

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Address
PO Box 572
Petersburg, Alaska 99833

Clyde Curry

PO Box 572
Petersburg, AK 99833
October 3rd, 2018

Chair John Jensen and Board of Fish members,

OPPOSING ACR 10, SITKA HERRING. I oppose efforts to shut down the Sitka herring fishery in an ACR. The proposal isn't an emergency. Fisheries fluctuate up and down, so there is no conservation concern. There is no new information. Listen to the Department, they have the science.

My name is Clyde Curry, and I am an initial issuer of a Southeast Alaska sac roe permit. I was there before the Sitka herring sac roe fishery got started. I started fishing in Alaska in 1963. I grew up fishing on Lummi Island in Puget Sound at my family reef net operation. My brother and I began gillnetting salmon when I was 12, and by the time I was 16 we had bought a boat and headed to Alaska. In 1966, we purchased our first salmon seine boat, the Puget, and fished it together in Southeast Alaska. I bought my own salmon seiner, the Louie G in 1968. In 1970, I married a local Petersburg fisherwoman and we began building a business and starting a fishing family.

My first experience with herring was on the tender Howkan around 1970 in Sitka, at that time it was a bait fishery. The season was just open, so people could fish whenever they wanted- guys were too impatient to wait for the roe to ripen up, so it all went to bait for halibut. I went on the Howkan to Prince William, the fishery up there was just getting started. I took my own seiner the Louie G to Sitka around 1972 or 1973 to fish herring in Sitka. After that, I also started fishing herring in Auke Bay, Seymour, Behm Canal and other areas. I fished herring in Ketchikan, Sitka, Juneau, Prince William Sound, Resurrection Bay, and Togiak. All those fisheries were managed differently than Sitka.

Sitka herring started as a small group of about five of us, and grew really fast after that. I was one of the initial issuers when the sac roe fishery went limited entry. When I first started going to Sitka before limited entry, I saw no effort to harvest roe on branches. When the sac roe fishery started there were many Alaska native permit holders. I can remember 9 off the top of my head. The native permit holders used to harvest branches to bring back to communities. That doesn't happen as much anymore.

I've watched the Sitka herring fishery go through ups and downs. There was NOT as much fish when we started the fishery as there is now. ADF&G managers can also tell you that I didn't always agree with the way they were managing the fishery. But that doesn't change the facts, that they keep the fish coming back. From the early 1970's to the early 1990's the biomass was small, nothing like it is today. After the Sitka pulp mill closed in 1993, I watched as herring really started to take off. Herring also got a lot bigger after the pulp mill closed. They were able to grow larger and live longer. Just look at the yearly graphs from the beginning of the fishery, and you'll see the huge increase in the size of herring and population after the pulp mill closed.

Submitted By
Daniel Castle
Submitted On
10/3/2018 12:46:13 PM
Affiliation

Phone
9076175500
Email
castlefisheries@gmail.com
Address
4430 S. Tongass Hwy.
Ketchikan, Alaska 99901

I am a Sac-roe permit holder and have taken part in the herring fishery in Sitka and elsewhere since 1988.

I am opposed to ACR10

The proposers of ACR10 have not provided the board with any new information that was not already discussed at length during the 2018 regular board cycle. Mountains of testimony and documents were carefully reviewed on this topic. Although I disagree with the Board action taken, more territory was set aside for traditional harvest.

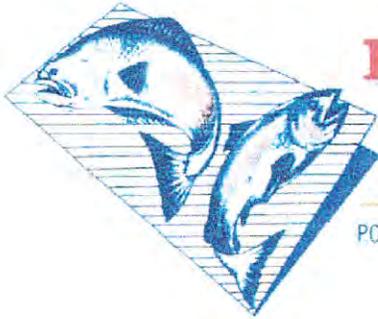
Nothing that happened during the spring herring spawning season was not forecasted or considered by the Board this January. All adjustments to fishing regimes, if needed, are covered by the management plan.

This proposal needs to be rejected. It can safely be disposed of without wasting any more Board resources.

If the Board takes up the issue, it should be to reverse the unnecessarily restrictive scheme adopted earlier this year.

Sincerely,

Dan Castle



E.C. PHILLIPS & SON, INC.

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October 3, 2018

Board of Fish
Alaska Department of Fish & Game

Subject: OPPOSE- ACR 10 to close the commercial sac roe herring fishery

We oppose ACR 10 regarding the closing of the commercial Sitka Sac Roe Herring Fishery for the purpose of re-allocating all herring to one user group.

Over the years ADF&G and the commercial herring fleet have made significant changes to the fishery in order to address concerns raised by the Sitka Tribe. This includes funding the harvesting and transport of roe on branches from the harvest grounds. ADF&G and the commercial herring fleet have been providing the Sitka Tribe with crucial information regarding herring distribution, location, and spawning activities. In 2018, historical fishing grounds were closed to commercial harvest to also address the Sitka Tribe concerns.

The fishery is heavily supported by a science based fishery management process to promote a sustainable fishery. This is important to the Sitka Tribes subsistence goals as well sustainability of the fishery. It is our understanding that the Sitka Sac Roe Herring Management is the "Gold Standard" for herring management in Alaska and possibly throughout the world.

ADF&G Sac Roe Herring data clearly indicates that herring populations have increased significantly since the start of the commercial fishery in the 1970s and especially following the closure of the pulp mill in 1993. Natural fluctuations in biomass and spawning behavior do not indicate a collapse in stocks, all species are cyclical in nature, good return years with not so good return years for unknown reason.

We oppose the ACR 10 to close the commercial sac roe herring fishery for any reason that is not supported by science based fishery management.

If there are any questions regarding our position on this issue, please do not hesitate to contact us.

Regards,

E.C. Phillips & Son Inc.



From: Gary Haynes
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: ACR10
Date: Tuesday, October 2, 2018 1:19:00 PM

Dear Board of Fish Members,

My name is Gary Haynes, I am a commercial fisherman from Ketchikan, Alaska. I grew up fishing on my parents' boat in the 1960's. I started fishing in Sitka in 1973 as a crewman for my father. I worked my way to the tophouse running the sonar, while my dad ran the boat. In 1995 my wife & I purchased the 'North Cape' from my folks & continued to fish Sitka. In 2002, I became a permit holder, & still fish today.

I have a lot of history in the fishery. I've also been involved in the SE seine salmon fishery since 1973 to present as both boat owner & operator.

I am NOT in support of ACR 10, to close the commercial SacRoe herring fishery.

This is not an unforeseen circumstance-this is not an emergency, it is an allocation grab.

The Sitka tribe has had a reasonable opportunity for subsistence harvest, the 2017 Subsistence Division report supports this.

From 2008-present, supplemental harvest of herring eggs by the industry averaged 40,000 pounds. An average from 35,000-75,000 pounds.

We have lost significant historical fishing areas & opportunity in order to address concerns of the tribe.

We did not reach our GHL for the fishery in 2018, however, there was still over 50 nautical miles of spawn.

There will always be natural fluctuations in biomass & spawning.

We rely on science based and sustainable fisheries management for our business and the future of our fisheries.

The state of Alaska is doing a great job of managing our herring sac roe fishery. The stocks have increased significantly since I started fishing in Sitka in 1973.

This is not an unforeseen circumstance-this is Not an emergency-this is an allocation grab!

Thank you,

Gary L Haynes
Ketchikan, Ak

Sent from my iPhone

From: James Burton
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: ACR 10
Date: Wednesday, October 3, 2018 3:44:08 PM

To the Alaska BOF members:

My names is James Burton, I am a commercial salmon fisherman in PWS, I own an operate a purse seiner and a drift gillnet operation. I am also a sport, personal use, and subsistence user of multiple finfish and shellfish species.

I oppose ACR 10:

ACR 10 is not backed by any scientific research, unlike the fisheries that occur in Sitka Sound. Arguably, the Sitka Sound Sac Roe fishery is the most heavily managed, and critiqued fishery in the State of Alaska. Clear and convincing research, ongoing stock assessments and spawn surveys contradict the claims made by the proposers of ACR 10. In fact, although there were only 33 miles of spawn in Sitka Sound, the spawn deposition survey revealed that the spawn extended twice as far offshore, and egg density was higher.

"Therefore, due to exceptional spawn along the Kruzof Island shoreline, the 2018 herring spawning biomass was much higher than was apparent from the spawn mileage alone."
- <http://www.adfg.alaska.gov/static/applications/dcfnewsrelease/903692282.pdf>

It is worth noting that management of Sitka Sound Herring, and cooperation with the Sac Roe industry is what led to the closure of the 2018 fishery. As fishermen, we understand and advocate the value of leaving smaller fish in the water as they are the "recruitment" classes of fish for fisheries in later years. We have a vested interest in the long term conservation of these stocks. The approach proposed in ACR 10 fails to acknowledge this. Please deny ACR 10.

Thank you,

James Burton

From: James Burton
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: ACR 8
Date: Wednesday, October 3, 2018 2:49:59 PM

To the Alaska BOF members:

I support ACR 8 despite the fact that ADF&G have stated in staff comments that they do not find that it fits ACR requirements for fishery conservation concern or an unforeseen impact by a change of regulation.

In the ACR, Ahtna outlines concerns for King Salmon stocks by dipnetting from a boat in an area where that pressure was previously minimal. Under the C&T practices of the Ahtna, clearly, operating a dipnet from a boat with the assistance of fish finding technology does not fit. Multiple sport fishing guides were posting photos and updates on their social media pages this year, showing images of larger targets, claiming they believed to be seeing king salmon on their depth sounders, and targeting those fish. It is undeniable that this type of harvest differs from passive fish wheels in the Glenallen Subdistrict.

By shifting pressure from the personal use Chitina subdistrict, to the Glenallen subsistence subdistrict, I believe this meets the criteria for an unforeseen change caused by a change of regulation. The proposal is not to limit or prevent dipnetting, it is to prevent dipnetting from a boat. Finding and targeting kings using boats and employing today's fish finding technology does not align with normal C&T findings.

Thank you,
James Burton
Cordova, AK

Submitted By
London Alber
Submitted On
10/3/2018 4:24:54 PM
Affiliation
crew member

i am writing to let my opposition to ARC 10 be known, the sitka sac roe fishery is one of the healthiest fisheries in the state of alaska, it is a big part of my income as well as many other crew members and Sitka residents, It would be wrong to not have this fishery because tribal members dont harvest their susitance quota, We should explore other solutions to the problem.

Submitted By
Louie Alber
Submitted On
10/3/2018 3:47:39 PM
Affiliation
permit holder

Phone
2067187508
Email
louiealber@hotmail.com
Address
po box 111
cordova, Alaska 99574

I want to express my opposition to ACR 10, The Sitka Sac Roe fishery is one of the best managed fisheries in the State of Alaska. The biomass is healthy as shown by science provided by the Alaska Department of Fish and Game. This fishery provides a great portion of my families living as well as my 3 crew members and many many others including tendermen, processors and residents of Sitka. It would be a devastating to those people and the market to put this fishery on hold for a few who don't take advantage of their right to the fishery.

Sincerely,

Louie Alber F/V Leading Lady

Submitted By
Marina Alber
Submitted On
10/3/2018 5:04:40 PM
Affiliation
crew member

i am writing to let my opposition to ACR 10 be known, the sitka sac roe fishery is one of the healthiest fisheries in the state of alaska, it is a big part of my income as well as many other crew members and Sitka residents, It would be wrong to not have this fishery because tribal members dont harvest their subsistance quota, We should explore other solutions to the problem.

Submitted By
Ronald Blake
Submitted On
10/3/2018 4:44:17 PM
Affiliation

Dear chairman Jensen and members of the Board,

I am a commercial fisherman of the Sitka sac roe fishery from Cordova Alaska. I am a member of a traditional Native home. This means Native children are raised in our home in a traditional Native manner. My wife is a strong advocate of protecting the Native heritage. We understand the challenges of preserving the Native culture, we understand the importance of subsistence to this.

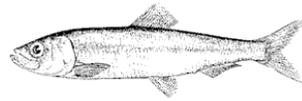
We don't believe that any further restrictions would help in any of this. The spawn's of the last decade have been many in several decades prior, yet subsistence continues to be a big problem. We believe that like in our community the problem is with a lack of interest by the youth, a lack of tools and equipment to harvest the resource and a loss of elders and their knowledge.

Due to this we are opposed to ACR 10

Ronald Blake

F/v Ace

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

October 3, 2018

Alaska Board of Fisheries
Work Session Comments
October 15 & 16, 2018, Anchorage

Dear Chairman Jensen and Alaska Board of Fisheries Members:

The Southeast Herring Conservation Alliance (SHCA) submits these comments on Agenda Change Request (ACR) 10 that you will be considering at the Board of Fisheries (BOF) October 2018 Work Session. Thank you for the opportunity to comment on this important issue. SHCA is a 501 (c)(6) nonprofit organization that represents the interests of herring fishermen, processors, tender men, crew, and families associated with herring fisheries throughout Southeast Alaska. SHCA members participate in the Sitka Sound herring sac roe fishery and other herring fisheries in Southeast. Forty-four sac roe permit holders of the 48 total permits in the Sitka Sound herring sac roe fishery are SHCA members.

SHCA strongly opposes ACR 10, which seeks to close the Sitka Sound commercial sac roe herring fishery. SHCA recommends that the Alaska Board of Fisheries confirms Alaska Department of Fish and Game's (ADF&G) assessment of ACR 10, including: a) there is not a fishery conservation purpose or concern, b) the agenda change request does not correct an error in regulation, and c) the agenda change request does not address an effect of regulation on a fishery that was unforeseen when the regulation was adopted. Apart from consideration of technical arguments in opposition to the proposers' arguments, SHCA does not believe that this ACR meets the criteria for being heard outside of its regular cycle.

Argument 1: there does not exist a fishery conservation purpose or concern

SHCA argues that conservation and protection of Sitka Sound herring are built into the age-structured-analysis (ASA) model through which multiple data sources are used with a formula to determine the fishery's harvest threshold. Currently no harvest can occur in the Sitka Sound commercial sac roe fishery until the biomass reaches 25,000 tons (adopted by the Alaska Board of Fisheries in 2009). As the biomass rises above 25,000 tons the formula provides for a harvest rate that begins at 10% and rises to a 20% harvest rate maximum. Most herring stocks in Southeast Alaska are considerably smaller than the minimum threshold of the Sitka Sound stock. The minimum threshold enabling the fishery has increased for the Sitka stock from 6,000 tons in



1977 to 7,500 tons in 1983 and then was raised to 20,000 in 1997 as the biomass continued to increase and political pressure surrounding the fishery continued unabated. This was presented as a conservation action, but then always raised by an amount to further accommodate subsistence uses – even though there was no discernable biological need, nor had ADF&G recommendation either the 20,000- or 25,000-ton threshold. By way of compromise to minimize loss of commercial harvest, the board adopted the “2+8” formula during the 1997 board cycle. In 2009 the Board of Fisheries again increased the minimum threshold, this time to 25,000 tons for added conservation at lower stock levels, although there was no conservation need demonstrated nor was this supported by ADF&G. This was done at a time when the herring expanded to nearly 90,000 tons in stock biomass.

Time and again the BOF has shown a willingness to interject increasingly restrictive approaches towards managing the Sitka Sound commercial herring fishery to accommodate political pressure from some subsistence users, including during the most recent regular board cycle culminating in Sitka during the board’s January 2018 Southeast and Yakutat Finfish and Shellfish meeting. We argue that there have been no new developments with the Sitka Sound herring fishery resource to warrant out-of-cycle regulatory action. Although the preliminary estimates reported by ADF&G indicate lesser Sitka Sound total spawn mileage in 2018 relative to the previous 10-year average, initial indications are for spawn deposition extending nearly twice as far offshore in 2018 as was the case in 2017, and with higher egg density. Due to exceptional spawn observed along the Kruzof Island shoreline, the 2018 herring spawning biomass was much higher than was apparent from the spawn mileage alone, according to ADF&G. Final results from ADF&G’s 2018 herring stock assessment for Sitka Sound will be available in November 2018, although the department currently estimates that the Sitka Sound herring population size did not change appreciably between 2017 and 2018.

As per the department’s Staff Comments (RC2) in response to ACR 10, the Sitka Sound herring stock’s abundance is currently about twice that of the 25,000-ton threshold. In ten of the past eleven years the population grew from an estimated 52,985-ton biomass to 145,042 tons and has more recently returned to the 50,000-ton range. According to ADF&G, recent downturns in Sitka Sound herring biomass is attributable to two weak three-year-old age classes (2012 and 2014). However, the 2013 age three fish were strong, and a review of the historical data shows the 3-year-old component has had multiple years of strong, weak, and moderate recruitment. None of this information specific to the Sitka Sound herring stock are indicative of the need for a fishery conservation purpose or concern.

Further, although it has been reported to the Alaska Board of Fisheries in past meetings that herring are important prey items in the diet of Chinook salmon, although Kemp (2014) demonstrates that adult herring can also have a direct and significant impact through predation of juvenile Chinook salmon. Kemp (2014) states that:

“Because herring were much more abundant than salmon species, the population-level consumption by herring exceeded consumption by salmon, sometimes by orders of

magnitude. If shared prey items are a limiting resource, there is considerable potential for herring to negatively affect salmon growth, particularly for Chinook salmon.”

Recent downturns in Chinook salmon abundance throughout Alaska have been well documented, although the cause for such declines is unknown. Further, preliminary estimates from the 2018 season indicate upticks in productivity and escapements for Copper River Chinook salmon in Southcentral Alaska, and for Chilkat River, Unuk River, and some hatchery Chinook salmon stocks in Southeast Alaska as well. Arguing that herring are needed to support Chinook salmon stocks is far too simplistic, in our opinion. We argue that ACR 10 makes a blanket statement about the importance of herring in the diets of halibut, lingcod and salmon without any supporting evidence, and encourage further exploration of this issue by board members.

Argument #2: there is no need to correct an effect on the fishery that was unforeseen when a regulation was adopted

The proposers state that low subsistence and commercial fishery harvests in 2018 require a reconsideration of the fishery. SHCA disagrees with ACR 10s assertions that the failure to harvest the 2018 season’s Guideline Harvest Level (GHL) in the Sitka Sound commercial herring fishery is indicative of biological concern for the fishery resource. Instead, it should be noted that 60% of the forecast biomass in 2018 was below industry’s minimum size threshold to satisfy market requirements, thereby making shortfalls in commercial harvest likely during the 2018 season. As the board knows, GHLs are a guideline by definition and design, and are not a guarantee for harvest.

Likewise, shortfalls in subsistence harvest in 2018 can be largely attributed to the majority of spawning taking place along the shorelines of Kruzof Island, Hayward Strait, and the Siginaka Islands, and not in the islands near Sitka. It is undeniable that this abnormal distribution of herring spawn in Sitka Sound led to a reduction in the subsistence harvest of herring eggs. However, as is the case with GHLs, amounts necessary for subsistence (ANS) are also guidelines that cannot be guaranteed through neither management nor regulatory action.

Instead, we argue that there is reasonable opportunity to achieve the ANS in Sitka Sound, but that there is insufficient participation. Supporting evidence can be found in Holen et al. (2011) and Sill and Cunningham (2017), both of which attribute recent downturns in Sitka Sound subsistence herring harvests to a “...general decrease in the participation of the subsistence herring egg harvest over the last 12 years...” Gmelch et al. (1985) reported that, in 1985, subsistence herring egg harvest in Sitka Sound was practiced by a small proportion of the community. Twenty-five years later, Holen et al. (2011) report that the number of harvesters has declined even further. Sill and Lemons (2017) report that several well-known elder “high harvesters” in the 80s, 90s and 00s were commercial fishermen (sac roe and salmon) who harvested herring eggs for Sitka and outlying communities, and who have since either retired or have died. Despite such low participation, Sill and Cunningham (2017) report that since 2006 the

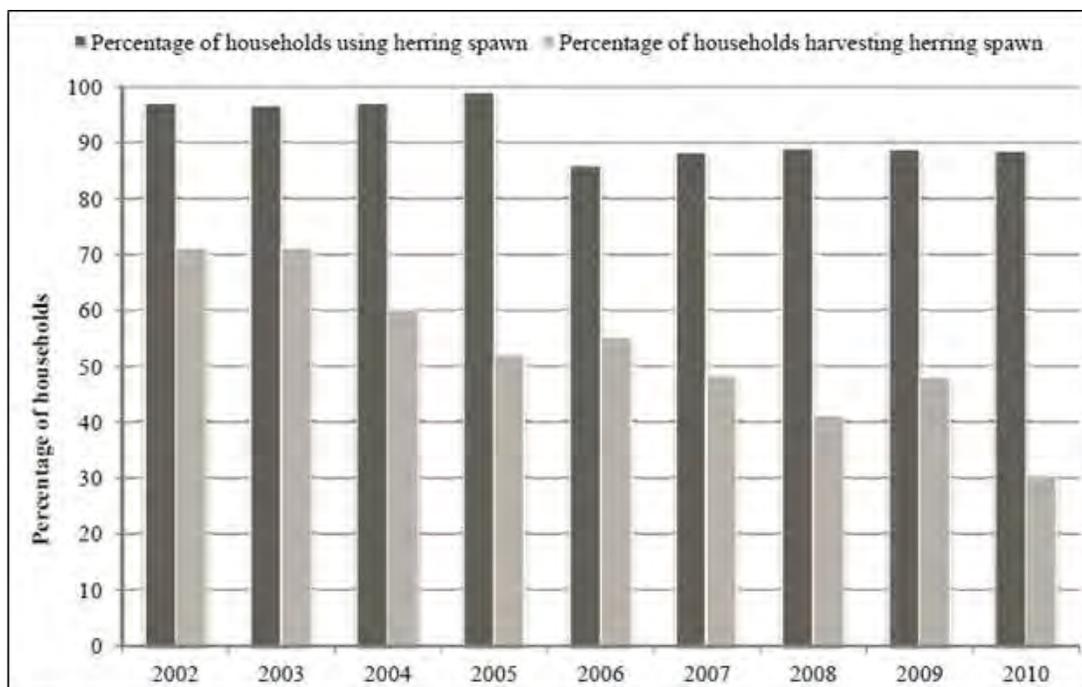


Figure 1.—Percentages of households harvesting and using herring spawn, 2002–2010 (from Holen et al., 2011).

amount necessary for subsistence (ANS) of herring spawn harvest was met in 2006, 2009, 2010, and 2014, and was close to being met in most other years. Holen et al. (2011) document a continued desire to receive herring eggs, although fewer and fewer households are participating in herring egg harvesting activities (Figure 1).

A valid question, then, is whether expansion of the “Core Area” or any part of the Core Area was necessary to provide a “reasonable opportunity” for subsistence, as defined in AS 16.05.258(f). That term is defined as “...allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant a reasonable expectation of success...” Accordingly, SHCA asserts that reasonable opportunity is available every year. Based on ADG&G survey transects, heavy spawn densities have been documented at locations along and/or within several miles of the Sitka road system in most years of the past decade (ADFG 2018; Appendix 10). According to Holen et al. (2011) the ANS guideline has been met six of the nine years documented in their report. In 2005, 2007, and 2008 when the lower ANS guideline was not reached, we argue that it was not due to lack of reasonable opportunity, but rather to reduced effort and participation, weather, and/or fuel costs, and a lack of transparency for reported numbers. Further, we argue that spawn distribution does have a role in success of harvest, as the herring do not spawn with the same intensity at all given locations every year. We believe that this was a factor in 2018, when the majority of meaningful herring spawn took place far from Sitka. Additionally, Holen et al (2011) acknowledge further uncertainty surrounding ADF&G harvest reporting since ADF&G’s methodology was changed in 2010. The report does not discuss what the overhaul in methodology means to previous subsistence harvest estimates,

however. The change certainly begs validation of, or qualification of previous results. Much additional work needs to be done to develop a scientifically defensible and transparent methodology.

Additional points for the board to consider: the ANS range is set artificially high and does not reflect verified weights and measure

SHCA's work in 2009, 2010, and 2012–2017 demonstrates that there is reasonable opportunity for subsistence harvest of herring in Sitka Sound. Determining the total weight of herring eggs (measured weights) required to meet subsistence needs is a different question. However, based on SHCA harvest data and monitoring, the actual usage demand appears to be closer to 50,000 lbs. for Sitka (SHCA 2009).

In the decade preceding closure of the “Core Area,” the department made a concerted effort to exclude commercial fisheries from the Core Area when possible, although it has not always been possible. However, most openings in the recent history of the fishery have been conducted outside of the Core Area based on ADF&G reporting. From 2002 to 2012, approximately 80% of the sac roe harvest has been taken outside of the Core Area, with all harvest having occurred outside the closed Core Area since 2013. Regardless, the Core Area has had abundant spawn in most years. It is the one constant. In some years, herring spawn in the Redoubt area or Deep Inlet but other years they do not. ADF&G (2018; Appendix 10) spawn maps show spawn in the Core Area most of the time, but not always. Certainly, there is variability in the spawn density but Kasiana, Middle, Crow, and a portion of the roadside most often have annual spawn.

In our opinion, closing the Core Area was intended to diminish the commercial fishery and its harvest. The proposers claim that subsistence needs cannot be met with the current sac roe fishery management plan. We believe that this is untrue and assert that there is good evidence to demonstrate otherwise.

If realizing ANS is used to curtail a fishery then that information needs to be transparent and verifiable

If subsistence harvest information is used to curtail a fishery, then we believe this information needs to be transparent and verifiable, similar to commercial fishery harvest data. There is no information to support that subsistence opportunity has been diminished in recent years. To the contrary, given increasing stock abundance and review of spawn distribution, one can only conclude that subsistence opportunity has been greater in recent years than it has been since the department began managing the Sitka Sound herring stock in the 1970s when the biomass was ten percent of recent biomass estimates (ADF&G 2018; Appendix 10).

It appears to many as though the ability for subsistence users to collect herring eggs may have declined for a variety of reasons, but there are groups and individuals ready to help with meeting that need. In 2008–2010 and 2012–2017 the herring fishermen, processors, tender men, and community members got behind a program to help meet this need. SHCA's herring egg harvest

data is supplied to ADF&G Subsistence Division each year and used in their analysis of Sitka Sound herring egg harvest. Through this work, SHCA has demonstrated that there was reasonable opportunity prior to closure of the Core Area.

SHCA and ANITA Collaborative Action Plan

During the January 2018 Southeast and Yakutat Finfish and Shellfish Board of Fisheries meeting in Sitka, SHCA and Alaska Native Inter-Tribal Association (ANITA) began exploring opportunities for improving dialogue among fishery stakeholders, with the intent of improving the quantity and quality of subsistence herring egg harvests in Sitka Sound, while also addressing misunderstandings and/or disagreements regarding the science supporting the management of this fishery resource. These discussions were received favorably by industry, representatives of Sitka Tribe of Alaska, and BOF members. Additional details may be found in the appendices of this letter and are submitted for fishery stakeholder consideration at the October 2018 Board of Fisheries Work Session.

In closing, SHCA strongly believes that there is no biological basis for closing the fishery and argues that this proposal is allocative. ADF&G has been meticulous in seeking outside consultants and experts to review its ASA model, including University of Alaska professor Ted Cooney and a recent Ph.D. candidate at University of Washington. In fact, in 2011 Canada's Department of Fisheries and Oceans (DFO) invited ADF&G to participate in a two-day workshop with DFO modelers and biologists, and to meet with modeling experts from the University of Washington (Dr. Andre Punt) and University of British Columbia (Dr. Steve Martell) in Nanaimo, B.C. (per. comm. Dr. Sherri Dressel). The scope of the workshop included model functions, inputs, outputs, mortality factors, review of precautionary approaches, and many esoteric modeling factors. The Canadian herring model was reviewed, and frequent questions were asked of the Alaska team to bore into model criteria. Based on the review it is apparent to SHCA that ADF&G is doing its due diligence to keep abreast of the latest modeling recommendations and science.

SHCA asserts that ACR 10's underlying arguments stand to unnecessarily harm the commercial fishery and those associated with it. This would include the communities of Sitka, Petersburg, Craig, Kake, Craig, Hydaburg, and Ketchikan; permit holders, crew members, tender operators and crews, processors and associated service providers in Southeast Alaska, and throughout the state. SHCA strongly recommends that the board take no action on this proposal and instead encourages all fishery participants to continue with their cooperative and collaborative efforts as previously outlined in RCs 379 and 380.

Thank you for your time and commitment to the board process and the opportunity to comment.

Sincerely,

Chip Treinen
President, SHCA

References and Literature Cited

- [ADF&G] Alaska Department of Fish and Game. Sitka Sound Spawn Locations, 1964–2017. Accessed on 10-1-2018 at http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/1964-2017_sitkasound_herringspawn.pdf
- Funk, F. 1991. Harvest policy implications of yield per recruit models for Pacific herring in Alaska. P. 453-462 in: Proceedings of the International Herring Symposium, Alaska Sea Grant Report AK-SG-91-01, Fairbanks, Alaska.
- Gmelch, G., S. B. Gmelch, and R. K. Nelson. 1985. Resource use in a small Alaskan city – Sitka. Alaska Department of Fish and Game Division of Subsistence, Technical Paper Number 90, Juneau.
- Holen, D., Stariwat, J., Lemons, T., Ciccone, V., and M. F. Turek. 2011. The subsistence harvest of herring spawn in Sitka, Alaska, 2002–2010. Alaska Department of Fish and Game, Technical Paper No. 343, Anchorage.
- Kemp, I. 2014. Spatial-temporal patterns in distribution and feeding of juvenile salmon and herring in Puget Sound, WA. A thesis submitted in partial fulfillment of the requirements for the degree of Master of Science. University of Washington School of Aquatic and Fishery Sciences, Seattle.
- [SHCA] Southeast Herring Conservation Alliance. 2009. Herring eggs on branches 2009 program.
- Sill, L. A., and T. Lemons. 2017. The subsistence harvest of Pacific herring spawn in Sitka Sound, Alaska, 2015. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 428, Douglas.
- Sill, L. A., and M. Cunningham. 2017. The subsistence harvest of Pacific herring spawn in Sitka Sound, Alaska, 2016. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 435, Douglas.
- Woodby, D., D. Carlile, S. Siddeek, F. Funk, J. H. Clark, and L. Hulbert. 2005. Commercial Fisheries of Alaska. Alaska Department of Fish and Game, Special Publication No. 05-09, Anchorage.

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
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October 3, 2018

Alaska Board of Fisheries
Work Session Comments
October 15 & 16, 2018, Anchorage

The Southeast Herring Conservation Alliance (SHCA) and Alaska Native Inter-Tribal Association (ANITA) submits these comments on Agenda Change Request (ACR) 10 that you will be considering at the Board of Fisheries (BOF) October 2018 Work Session, and thanks you for the opportunity to comment on this important issue. SHCA is a 501 (c)(6) nonprofit organization that represents the interests of herring fishermen, processors, tender men, crew, and families associated with herring fisheries throughout Southeast Alaska. SHCA members participate in the Sitka Sound herring sac roe fishery and other herring fisheries in Southeast. Forty-four sac roe permit holders of the 48 total permits in the Sitka Sound herring sac roe fishery are SHCA members. ANITA is an Alaska Native organization that focuses on issues that affect Native fisherman throughout Southeast Alaska. It is ANITA's goal to help protect and promote the commercial opportunities of Alaska Natives that participate in the region, while also keeping subsistence needs in mind.

We believe that there are meaningful updates to report to the BOF since the board deliberated on this fishery during its January 2018 Southeast and Yakutat Finfish and Shellfish meetings in Sitka. Namely, during this meeting, SHCA submitted RC 379 for public consideration, which was received favorably by industry, representatives of Sitka Tribe of Alaska, and BOF members:

http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2017-2018/se/rcs/rc379_Southeast_Herring_Conservation_Alliance_Subsistence_Herring_Eggs.pdf

Similarly, RC 380 was also submitted by Alaska Native Inter-Tribal Association (ANITA) and SCHA to the BOF for consideration as a mechanism to protect the Sitka Sound herring fishery resource in perpetuity for all users including subsistence herring egg harvesters, commercial fishermen, and the community of Sitka:

http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2017-2018/se/rcs/rc380_Southeast_Herring_Conservation_Alliance_Subsistence_Herring_Eggs.pdf

RC 380 was simultaneously provided to STA representatives with the intent of (1) tying the biomass of Sitka herring to financial contributions to STA, while (2) ensuring that these contributions had no strings attached. Further, (3) it was proposed that a contribution formula of \$10 per ton be utilized, which, using the 2018 Guideline Harvest Level (GHL) of 11,000 tons would equal \$110,000. Finally, SHCA offered to continue to assist the community of Sitka with the harvest of herring eggs using commercial fishing boats and/or tenders.

In response to this offer, STA expressed gratitude for industry's willingness to work with the Tribe in a cooperative and collaborative manner, and further recommended good faith actions for SHCA herring egg harvest activities to decrease potential conflict between subsistence harvesters and SHCA boats, including (1) spreading out the area of SHCA harvests, (2) marking buoys, and (3) adjusting the harvest practices of SHCA boats. SHCA and industry made good faith efforts to abide by these requests, and though the Tribe did not enter into an agreement with SHCA and ANITA, it is our understanding that they did agree to present this offer to a working group who will make a recommendation to the Tribal Council.

With regards to RC 379's "Workforce Development" component, ample opportunities remain in Sitka for collaboration between industry, STA, and others to better utilize local fisheries as educational platforms for local students. For example, the University of Alaska Southeast Fisheries Technology Program has a history of working with industry and Native organizations to promote fisheries education for high school students and has recently been awarded a National Science Foundation (NSF) grant for a project called "Enhancing Aquaculture: education for underserved Alaskan communities to promote workforce development in fishing industries." The main goal of the grant is to develop a semester-long aquaculture intensive in Sitka, Alaska, in partnership with local hatchery programs operated by Northern Southeast Regional Aquaculture Association (NSRAA) and Sitka Sound Science Center (SSSC):

<http://salmonculturesemester.alaska.edu/index.html>

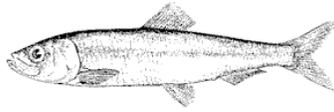
Further, a planned March 2019 Alaska Chapter American Fisheries Society conference in Sitka presents an excellent opportunity to achieve RC 379's "Improved community relations through collaborative educational/social event" component. SHCA recommends that industry and STA work together to ensure that this event provides an educational opportunity for all parties to include scientific presentations, and social/community gathering(s) designed around the conference's format.

SHCA and ANITA submit this letter for the board's and fishery stakeholder consideration at the October 2018 Board of Fisheries Work Session. Thank you for the opportunity to comment on this important issue.

Sincerely,

Chip Treinen, SHCA
John Carle, ANITA

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

January 20, 2018

Alaska Board of Fisheries
January 15 – 23, 2018
Sitka, Alaska

Dear Chairman Jensen and Alaska Board of Fisheries Members:

Mission for agreements: protection of the Sitka Sound herring resource in perpetuity for all users including subsistence herring egg harvesters, commercial fishermen, and the community of Sitka by identifying solutions and opportunities for collaboration.

The draft long-term action plan featured below seeks to improve the quantity and quality of subsistence herring egg harvests in Sitka Sound, while also addressing misunderstandings and/or disagreements regarding the science supporting the management of this fishery resource.

Potential local collaborators to assist with the successful prosecution of this action plan include, but will not be limited to: Sitka Tribe of Alaska (STA), Sitka Sound Science Center (SSSC), University of Alaska Southeast Fisheries Technology Program (UAS-FT), Sitka School District (SSD), and the Southeast Herring Conservation Alliance (SHCA).

DRAFT Sitka subsistence-commercial herring action plan

Industry support of subsistence herring egg harvest

- Conceptual agreement regarding financial contributions to STA (provided separately);
- Multi-processor collaboration and funding;
- Use of seiners and/or tenders to facilitate subsistence herring egg harvest, performed to STA's cultural standards;

Workforce development

- Collaboration between UAS-FT, SSD, SSSC, STA, and SHCA to develop and prosecute high school and undergraduate curricula dedicated to traditional foods, highlighting collaboration among

commercial and subsistence users (includes application and contributions of aquaculture and mariculture);

- Industry to co-fund (with STA) course development and program costs, including establishing scholarships and creating internships for participation in field activities;

Improved community relations through collaborative educational/social event

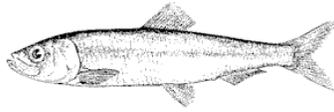
- Development of a collaborative preseason forum (herring festival/conference) to include Alaska Department of Fish and Game, STA, industry, and other outside entities to be determined;
- Co-funded by industry and STA;
- Forum will serve as an educational opportunity for all parties, to include presentations, and social/community gathering(s) designed around the forum's format.

Sincerely,



Steve Reifenstuhl
Executive Director SHCA

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

January 20, 2018

Mission of Agreement: Protection of the Sitka Sound herring resource in perpetuity for all users including subsistence herring egg harvesters, commercial fishermen, and the community of Sitka.

Representing **Alaska Native Inter-Tribal Association (ANITA) & SHCA**

Concept of agreement

1. Tie biomass of Sitka herring to STA contribution
2. Contribution to STA with no strings attached (teaching youth, subsistence eggs for elders were mentioned as important traditions)
3. Contribution formula \$10/ton (Example using '18 GHF ~11,000 tons equals \$110,000)
4. SHCA continues to help with community harvest of herring eggs using fishing boats and/or tenders. We would like to collaborate with STA harvest as much as possible and this can take many forms as defined by STA. Goal would be for SHCA vessel(s) to harvest 40,000 to 50,000 pounds

We have more thoughts for collaboration but this is the essence of the offer.

Sincerely,



Steve Reifentstahl & John Carle ANITA
Executive Director SHCA

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

March 16, 2018

Steve Reifenstuhl
Southeast Herring Conservation Alliance
PO Box 61
Sitka, Alaska 99835

Dear Mr. Reifenstuhl:

This is in response to your letter of January 20, 2018, in which Sitka Herring Conservation Alliance (SHCA) offered to enter into a cooperative agreement with Sitka Tribe of Alaska regarding collaborative harvest activities and funding. At this time, the Tribe is not prepared to enter into an agreement with the items that you have proposed; I have presented your offer to a working group who will make a recommendation to the full Council in due course. It is good, however, that you have indicated a willingness to work with the Tribe and I take this opportunity to suggest on behalf of the Tribal Council some avenues for increasing good will. Conflicts have arisen in previous years between individual and Tribal subsistence herring egg harvesters and those hired to harvest herring eggs for SHCA, and I would appreciate your help in reducing the possibility for conflict in this year's harvest. SHCA could show good faith by agreeing to actions outlined below that will decrease conflict between subsistence harvesters and the commercial industry during this year's harvest, including (1) spreading out the area SHCA harvests, (2) marking buoys, and (3) adjusting the harvest practices of SHCA boats.

First, the Tribe requests that SHCA harvest boats refrain from placing sets along western Kasiana Island and the waters from the most southeastern point of Middle Island along its western shoreline to the narrowest point in Crow Pass. SHCA harvest boats regularly place many of their sets in the core subsistence area, represented in 5 AAC 27.150. Most of these sets are placed in the water well before the spawning begins and the sets carpet areas that have historically produced larger harvests of quality herring eggs. The carpeting of these areas has led to the displacement of individual and Tribal subsistence herring egg harvesters. As is often referenced in Board of Fish testimony and discussion, SHCA has a very capable fleet that can travel and harvest anywhere. Focusing the efforts of large industry vessels into areas that are not as safe for the average tribal harvesters (due to distance and exposed weather conditions) may reduce conflict and allow for a dispersal of the subsistence harvest, which in turn should be a more successful harvest for all. The attached map specifically defines the areas included in this request.

Second, the Tribe requests that the boats harvesting herring eggs for SHCA clearly mark all their sets with buoys that contain the name of the harvester, the boat name or

(907) 747- 3207 • Fax: (907) 747- 4915 • 456 Katlian Street • Sitka, Alaska 99835



registration number, and city in which the harvester resides, and that they take care to harvest only those sets that SHCA has placed. During last year's subsistence harvest, numerous individual and Tribal subsistence harvesters witnessed their sets being pulled by the *FV Kallian*. We hope this was an inadvertent error caused by confusion on the part of the *Kallian* captain due to his sets being inadequately marked. Clear marking of SHCA sets will avoid the possibility of inadvertent harvest of sets that do not belong to SHCA. STA will also advise individual and Tribal harvesters to mark their sets.

Third, the Tribe requests that SHCA boats refrain from retrieving sets by dragging them out to deeper water to haul on board larger vessels. Over the last few years, the Tribe has received complaints from individual and Tribal subsistence herring egg harvesters about this practice of SHCA boats. In many cases, when these sets are dragged to deeper water they get tangled with other sets made by individual and Tribal subsistence harvesters. This results in many of these harvesters not being able to locate their sets due to their markers no longer being visible after being dragged into deeper water. It would decrease conflict between non-commercial subsistence harvesters and SHCA if SHCA boats refrain from this type of harvest practice when there is potential to impact individual and Tribal subsistence harvesters.

Thank you for your attention to these issues and for reaching out to the Tribe as you have done. Please feel free to contact General Manager Lisa Gassman (747-3207) if you would like further clarification.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy Hope Erickson", is positioned above the typed name.

Kathy Hope Erickson
Tribal Council Chairman





Fisheries Technology Newsletter

SITKA CAMPUS UPDATES, FALL 2017



A group of high school students in Juneau participating in Oceanography 101 through Goldbelt Inc. sit with Professor Brewer to learn about their iPads.

(Photo provided by Ana Christine Tayofa.)

Industry and Native organizations promote fisheries education for high school students

This fall, 36 high school students are taking UAS courses, thanks to financial assistance from the At-Sea Processors Association (APA) and Goldbelt Inc. Most of the students are taking courses for dual-enrollment (high school and college credit), while others are simply getting a headstart on their college careers! APA also assisted with a pilot program in spring 2017, during which 13 high school students completed 4 credits of college coursework during the school day. Goldbelt Inc. has worked to engage Juneau-based Alaska Native students in the sciences, beginning with a summer 2017 oceanography learning experience and culminating with 22 students taking the iPad-based Introduction to Oceanography class for University of Alaska General Education credit. This year, APA and Goldbelt have helped 50 high school students take on university-level coursework all over the state: from Kodiak, Juneau, and Sitka to Unalaska, Galena, and Petersburg. Thanks to APA and Goldbelt for supporting the next generation of fisheries and/or marine scientists!



9/30/2018

UAS Fisheries Technology program receives NSF grant to enhance aquaculture education in Alaska – UAS Fish Tech



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Alaska > UAS Fisheries Technology program receives NSF grant to enhance aquaculture education in Alaska

UAS Fisheries Technology program receives NSF grant to enhance aquaculture education in Alaska

fishtech June 28, 2018 Alaska, News, UAS, Uncategorized

The University of Alaska Southeast Fisheries Technology (Fish Tech) program just received word that NSF will be funding a project called *Enhancing Aquaculture: Education for underserved Alaskan communities to promote workforce development in fisheries industries or just Enhancing Aquaculture*. The \$567,326 grant will allow the Fish Tech program to hire a three-year term funded faculty member that will focus on teaching UAS courses in aquaculture and mariculture. The main goal of the grant is to develop a semester-long aquaculture intensive that will be taught in Sitka, Alaska (<http://salmonculturesemester.alaska.edu/>). Though Fish Tech will continue to offer distance courses, this semester intensive will primarily be hands-on with students taking courses in Alaska Salmon Culture, Field Safety, Vessel Operator, Outboard Maintenance, and more. Some other unique aspects of this intensive include a 300-hour internship that will be performed at one of three local hatcheries, visits to at least one remote hatchery, and a job fair near the end of the semester so that students going through the program can make plans for working in the salmon enhancement industry the following summer. For more information contact the Fish Tech Program Director Reid Brewer (rsbrewer@alaska.edu, or 907-747-7799)



UNIVERSITY of ALASKA SOUTHEAST

Salmon Culture Semester

A Hands-On Learning Experience
Spring 2019 (January 14 - May 3)

Salmon Culture Semester Core (13 Credits)

Fisheries Technology 122: Alaskan Salmon Culture I (3 Cr)

The first of a two-course sequence, this course introduces students to the principles, concepts and methods used in the production of Pacific Salmon. The course addresses all aspects of fry and smolt production, with an emphasis on modern fish culture techniques used by Alaskan producers. Topics include water quality, brood stock management, egg collection and incubation, egg and live fish transport, fresh and saltwater rearing techniques, feeding practices, growth, record keeping, and fish health management.

Fisheries Technology 222: Alaskan Salmon Culture II (3 Cr)

The second course of the Alaskan Salmon Culture sequence. In this class, methods used to enhance and rehabilitate the five species of Pacific salmon harvested in the commercial, sport and subsistence fisheries of Alaska and Northwestern United States will be covered in detail, and students will be provided with a thorough understanding of regulations and guidelines established by the state of Alaska to administer salmon enhancement programs through private non-profit aquaculture association. Prerequisite: successful completion of FT 122.

Fisheries Technology 230: Alaskan Salmon Culture Lab (1 Cr)

This intensive course focuses hands-on learning, as students put salmon enhancement techniques and skills into practice. Topics include egg incubation techniques, feeding techniques, rearing, pathology and tagging and marking techniques. Course includes an in-class lecture portion, hands-on lab activities, and visits to local salmon hatcheries.

Fisheries Technology 291: Fisheries Technology Internship (3 Cr)

This course is an opportunity for students to apply their Pacific salmon enhancement coursework in a professional aquaculture setting. Students will be matched with local facilities to further practice and develop their hands-on hatchery and fish culture techniques and skills.

Fisheries Technology 193: Cold Water Survival (1 Cr)

Students will learn the basic skills to survive in cold water. This course consists of classroom instruction, pool skills, and ocean experiences. Topics include: Hypothermia, Dressing for cold, Types of PFDs and their uses, Retrieving someone who falls overboard, Radio calls, Survival suit and raft training, and other related topics.

Marine Transportation 119: Small Vessel Operator (1 Cr)

Learn to safely operate a small vessel in Alaskan waters. Covers navigation, rules of the road, trip planning including weather, radio operation, line handling and vessel operation including a practice session on the water. Foul weather/rain gear may be required.

Marine Transportation 120: Outboard Motor Maintenance (1 Cr)

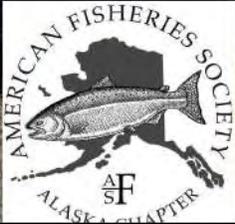
An introduction to outboard systems that need maintenance and upkeep for efficient operation. Ignition, carburetion power head and lower unit systems will be studied emphasizing preventive maintenance.

<p>Enrollment is open until filled, for 20 participants maximum. October 15, 2018 is the deadline for priority consideration. The University of Alaska Southeast has been accredited by the Northwest Commission on Colleges and Universities since 1983. UAS is an AA/EO employer and educational institution.</p>	<p>For more information, contact: Dr. Reid Brewer rwbrewer@alaska.edu 907-747-7799 Or visit www.diversification.alaska.edu</p>
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AFS Alaska Chapter Annual Meeting 2019 Sitka, AK March 19 - 21

Location: Sitka, AK
Dates: March 19-21, 2019
*Continuing Education: March 18
*Field Trips: March 22



Save The Date!
American Fisheries Society Alaska Chapter Annual Meeting 2019
Location: Sitka, AK
Dates: March 19-21, 2019
*Continuing Education: March 18
* Field Trips: March 22

Call for Symposia coming soon
Call for Abstracts shortly after



**ALASKA DEPARTMENT OF FISH AND GAME
DIVISION OF COMMERCIAL FISHERIES
FISHERY UPDATE**



*Sean Costello, Commissioner
Scott Kallay, Director*



Contact: Eric Coonradt Phone: (907) 747-6688 Fax: (907) 747-6693	Sitka Area Office 304 Lake Street, Room 103 Sitka, Alaska 99835 Date: April 27, 2018 Time: 1:15 p.m.
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SITKA SOUND SAC ROE HERRING FISHERY ANNOUNCEMENT

Sitka. The Alaska Department of Fish and Game has mapped 32.0 nautical miles (nmi) (Figure 1) of herring spawn in 2018 through April 27, including 1.0 nmi of active spawn in Salisbury Sound today. Spawn deposition surveys were conducted on April 7-11 and on April 24-25. Final results from this year's stock assessment will not be available until November 2018, however, some general information can be derived from the data collected to date.

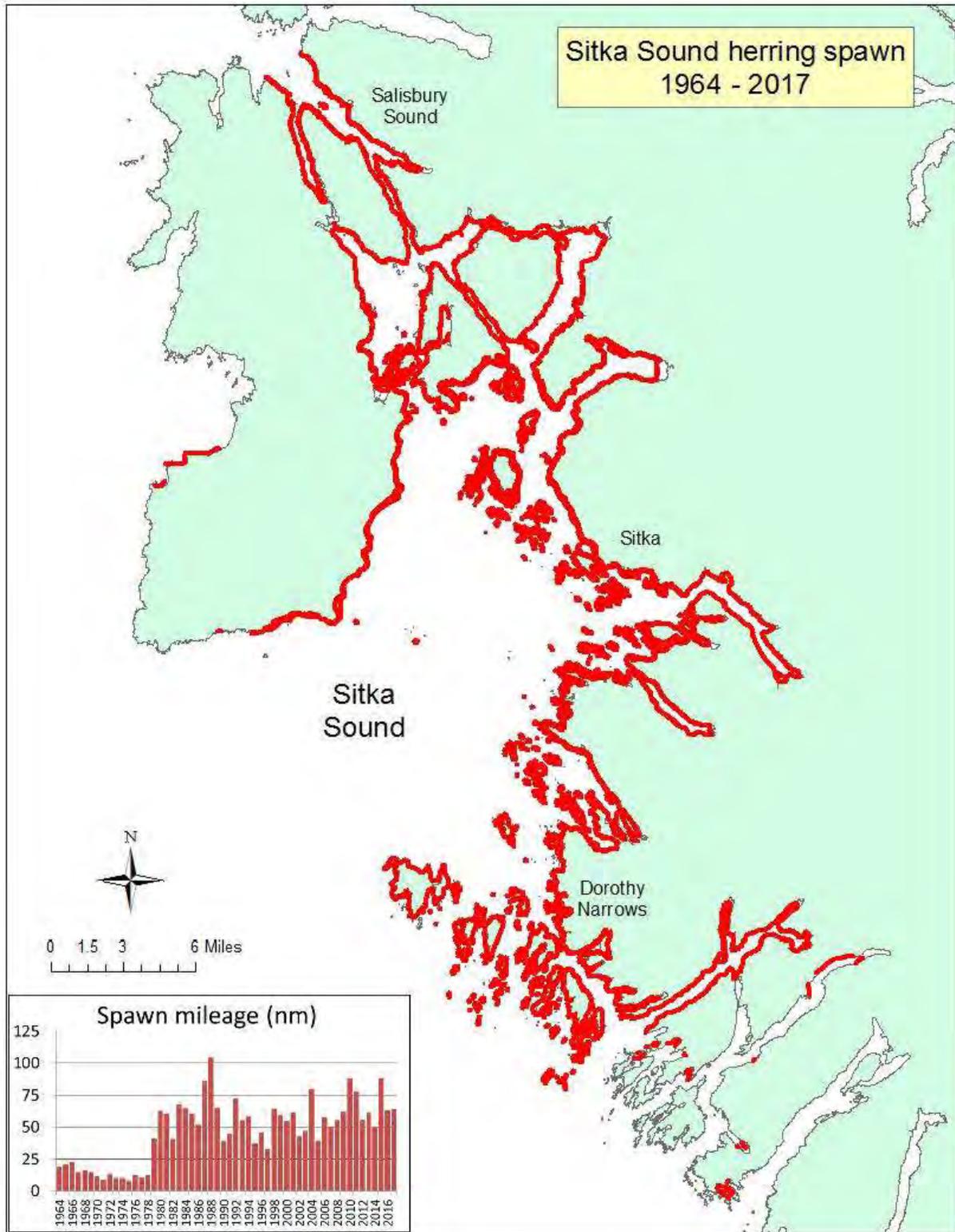
Nearly all spawning this year occurred along shorelines of Kruszof Island, Hayward Strait, and the Sigmaka Islands. Very little spawning was observed in the islands near Sitka, which typically receive substantial spawn. The lack of spawn in the islands near Sitka and the lower than typical spawn mileage are unusual and have not been observed for many years. However, preliminary results of the spawn deposition survey revealed that although spawn mileage was approximately half that of 2017, the spawn extended nearly twice as far offshore, and egg density was higher. In 2005 and 2006, a similar situation occurred where the spawn extended far offshore on Kruszof Island due to the very wide shelf of herring spawning habitat. Therefore, due to exceptional spawn along the Kruszof Island shoreline, the 2018 herring spawning biomass was much higher than was apparent from the spawn mileage alone.

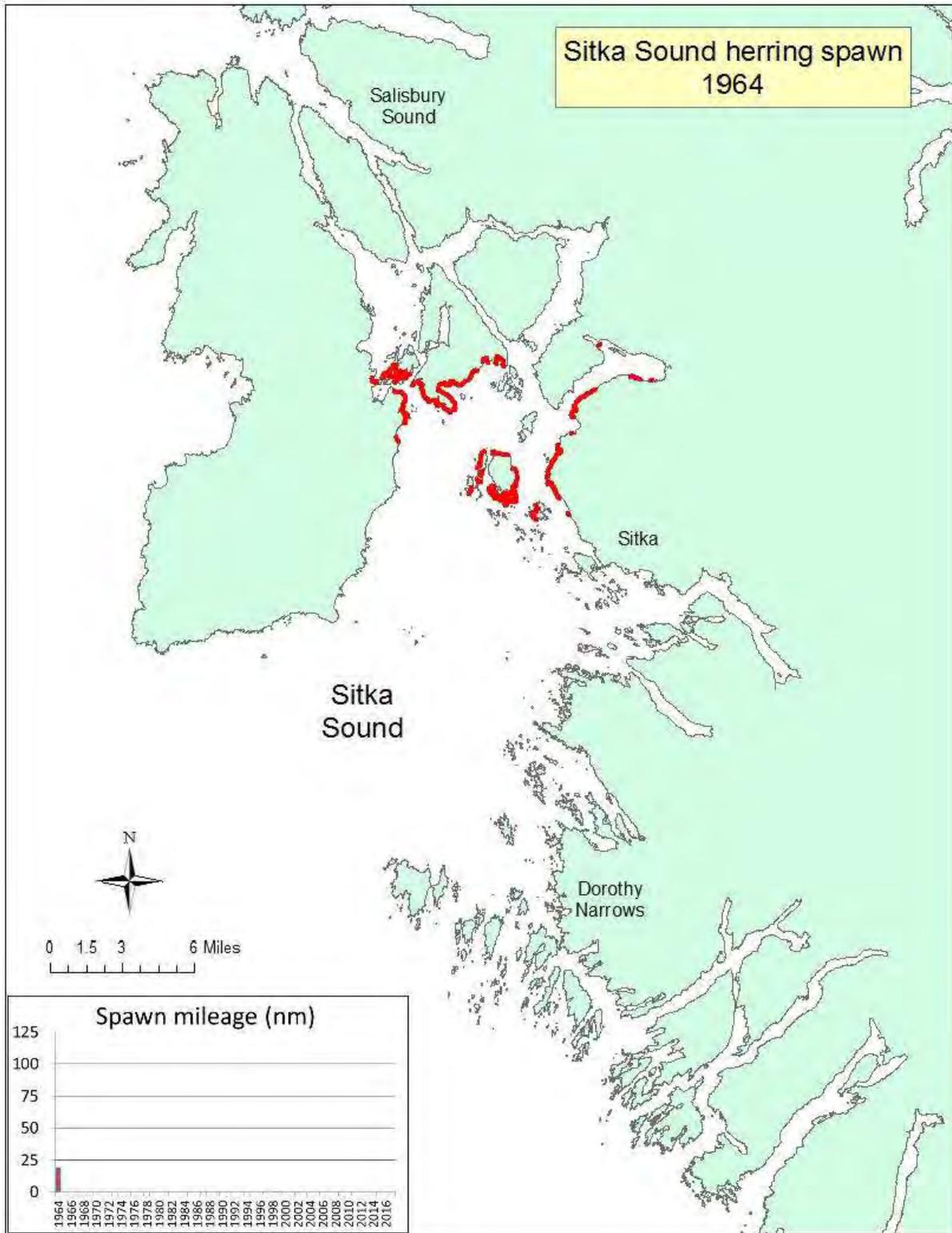
The total harvest this season is 2,926 tons with an average of 11.2% mature roe. This harvest is 8,202 tons short of this season's GHIL of 11,128 tons. The department announced the season closure on the VHF radio at 11:00 a.m., April 3, 2018. Multiple factors were considered in closing the fishery: The completion of the first spawn event with documented spawn totaling 13.3 nmi; the minimum size limit by processors (125 gram average) was higher this year than past years and 60% of the forecast biomass was below the size necessary to satisfy market requirements; although herring were available, due to the higher market requirements, herring meeting these requirements were not found despite extensive vessel and aerial surveys conducted in the last several days prior to the closure. The decision to close the fishery was made in consultation with industry representatives.

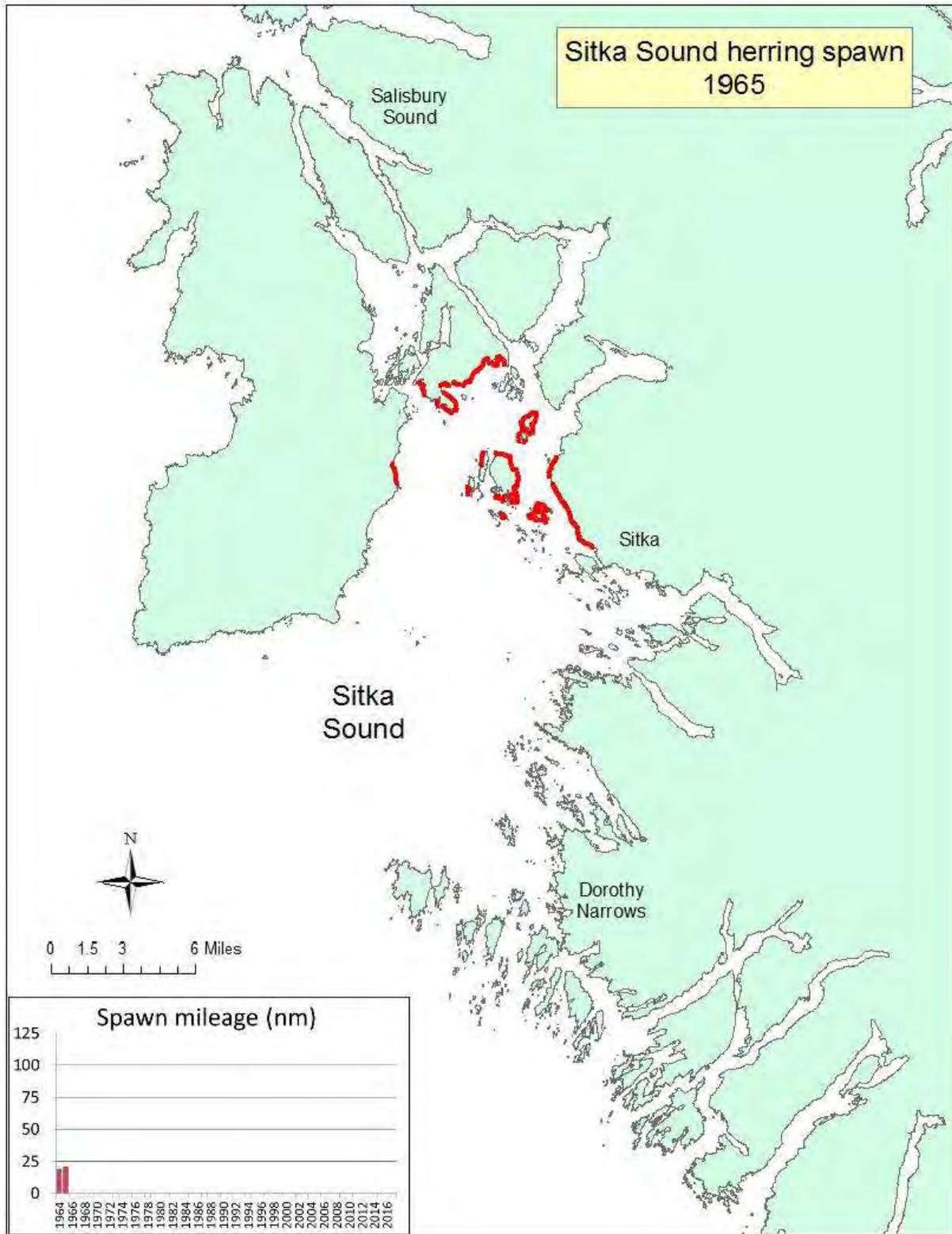
In 2017, 62.3 nmi of herring spawn was mapped; peak spawn occurred on April 8 and the last spawn was observed on April 21. The 2017 model estimated post fishery biomass was 49,347 tons.

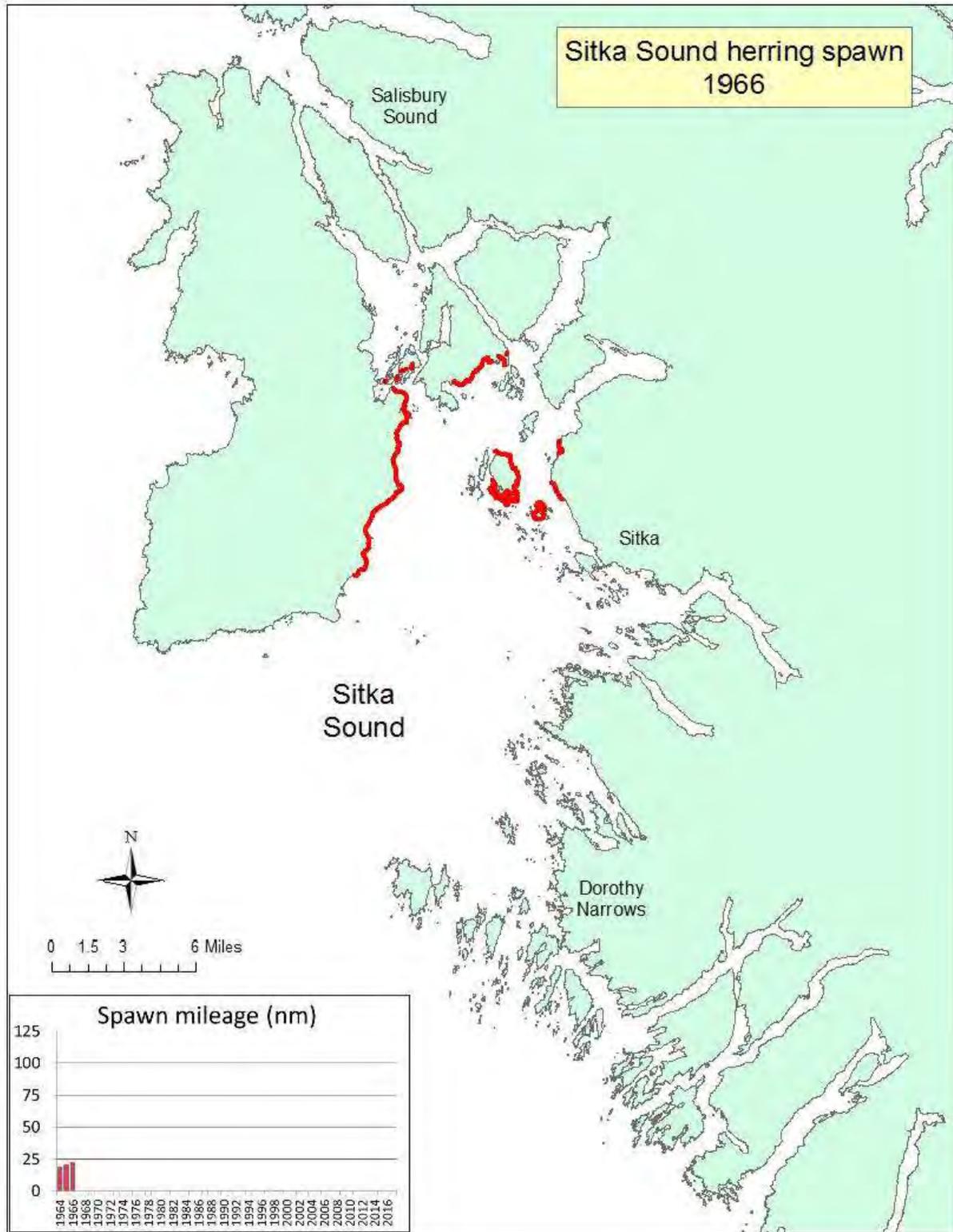


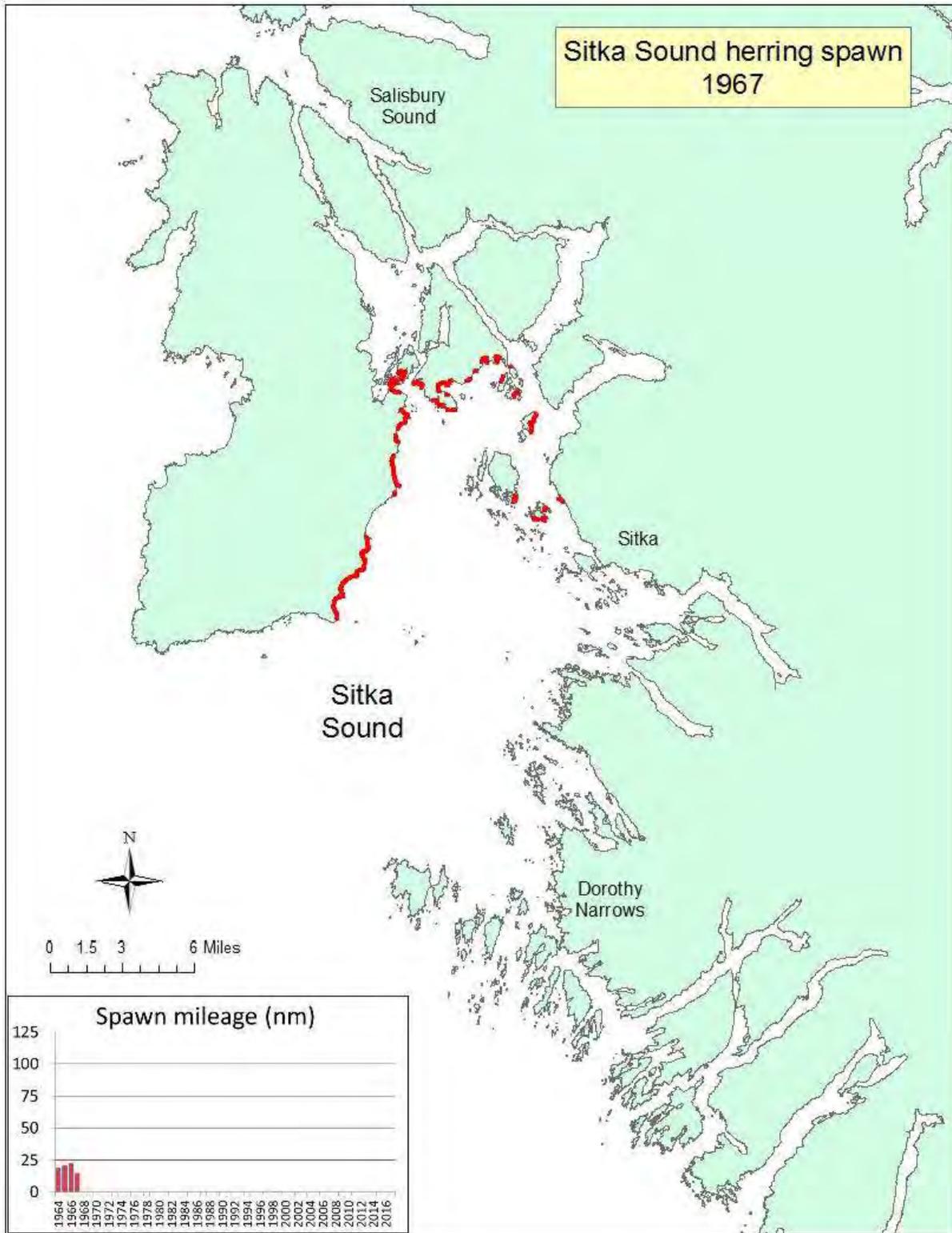
Figure 1. 2018 Sitka Sound herring spawn.

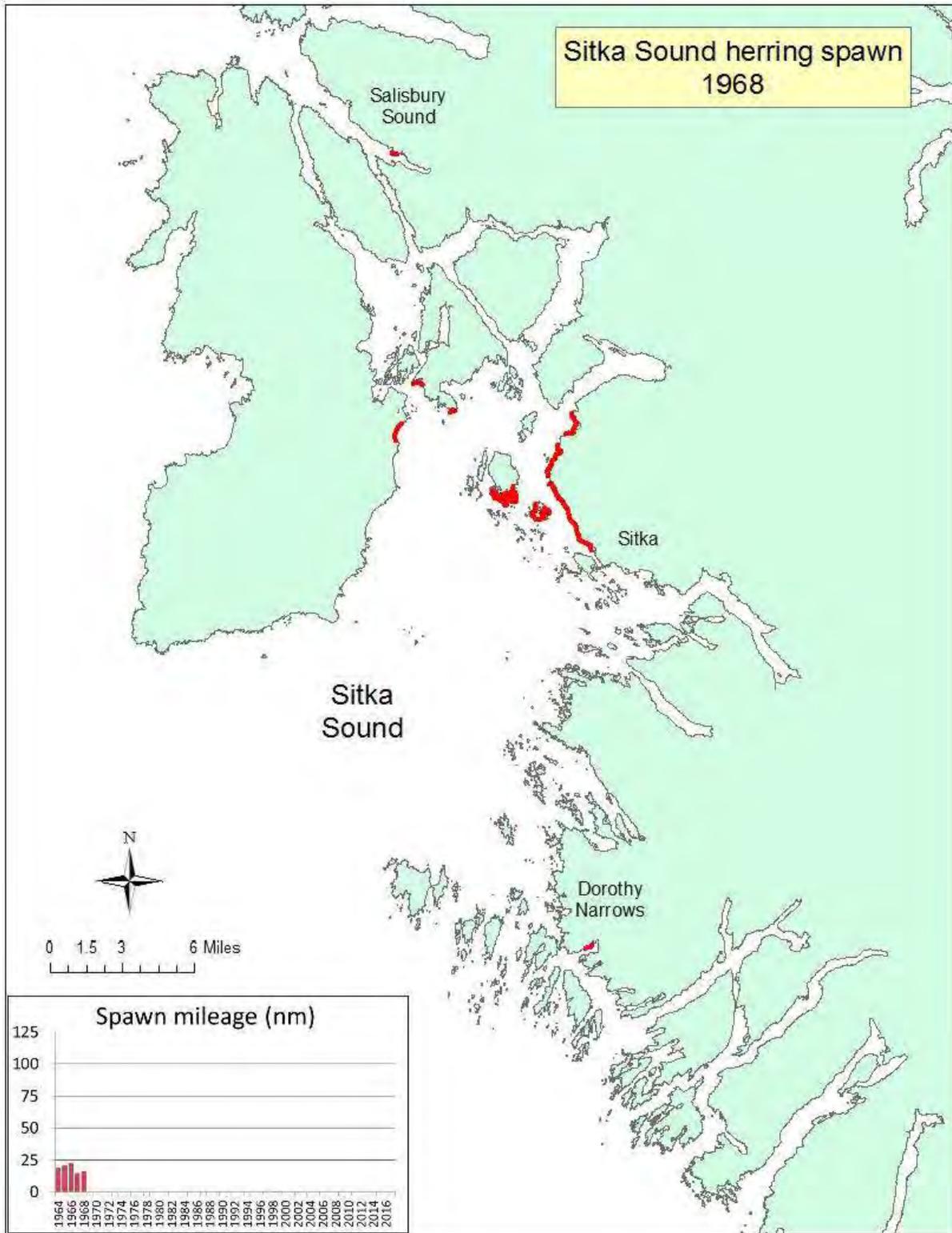


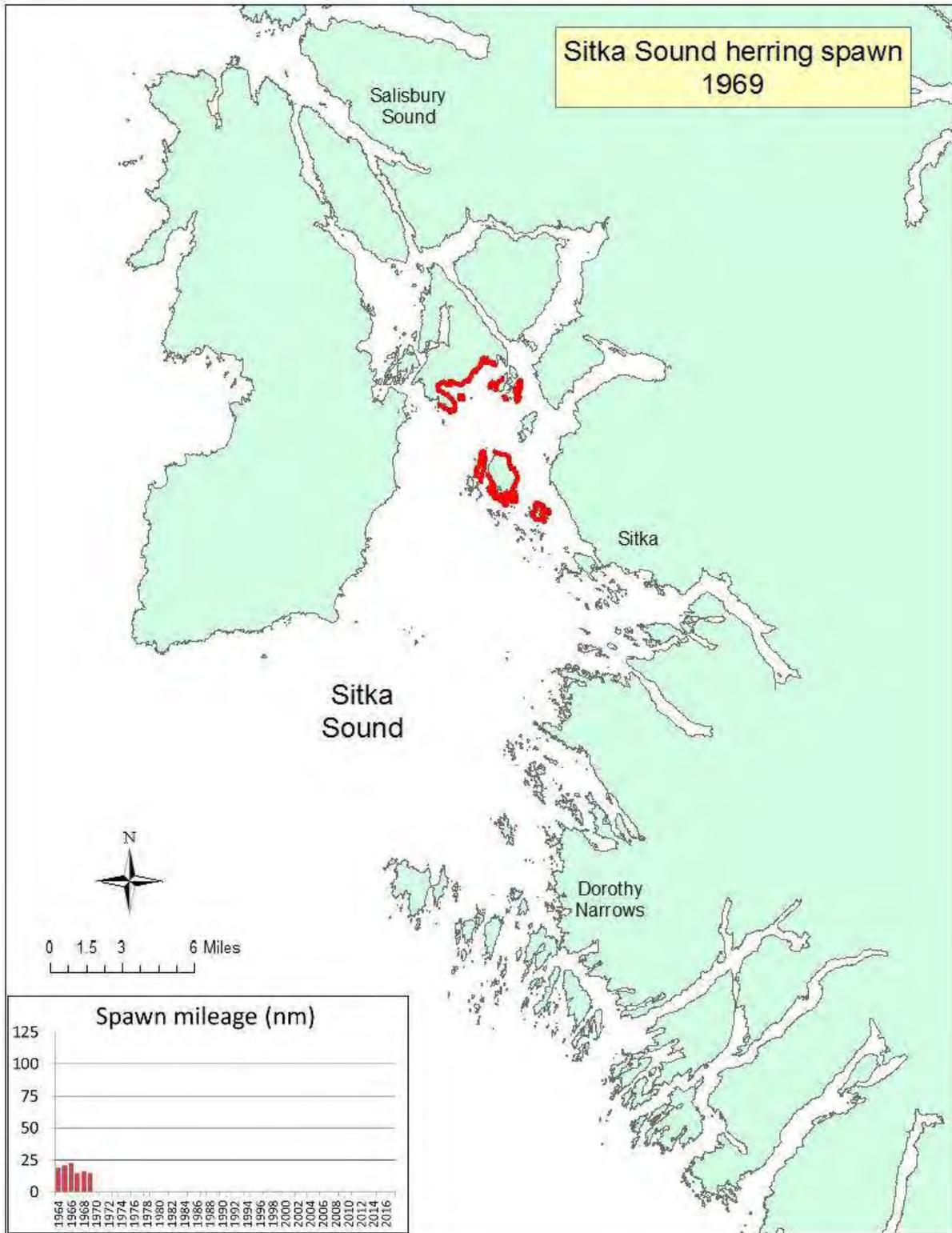


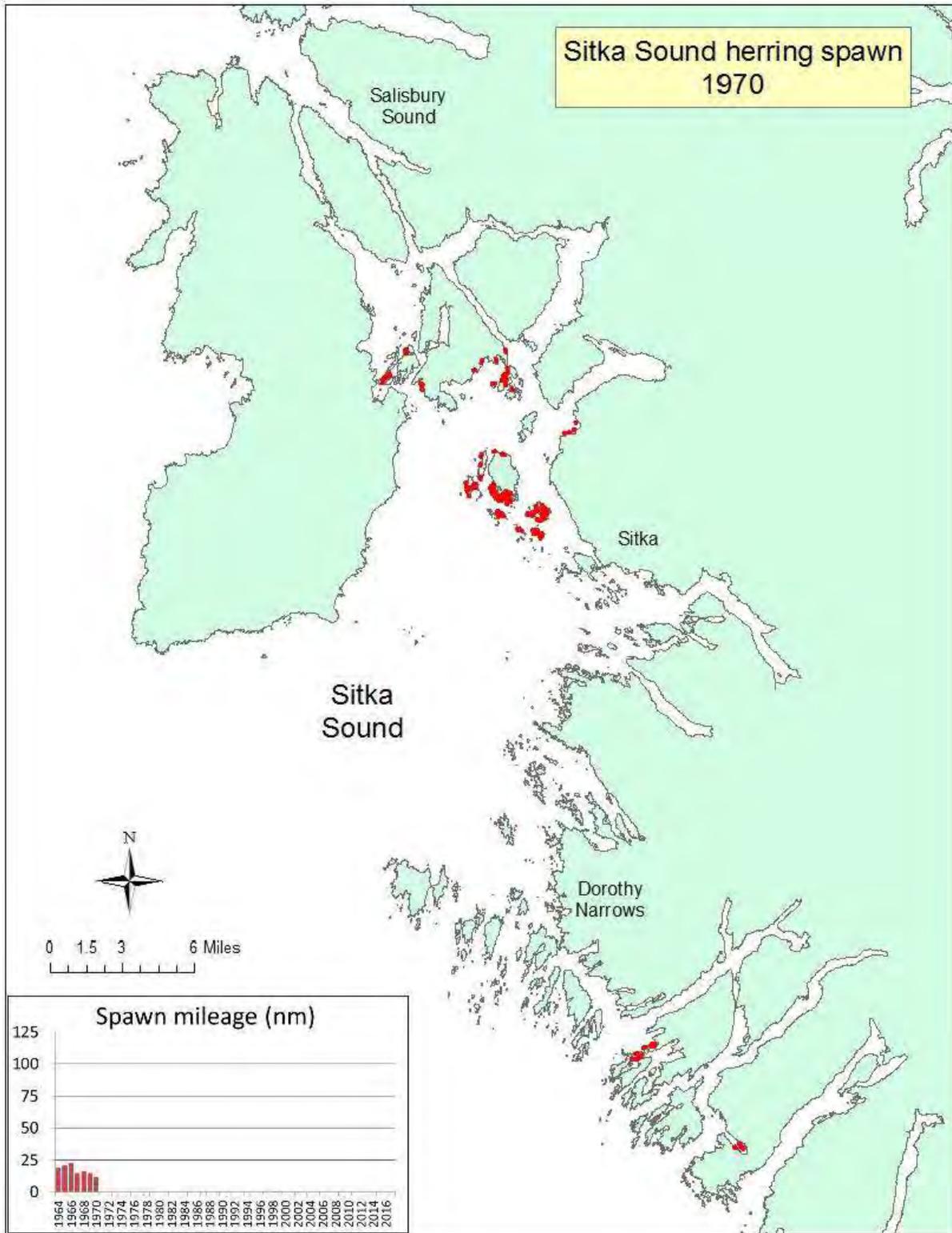


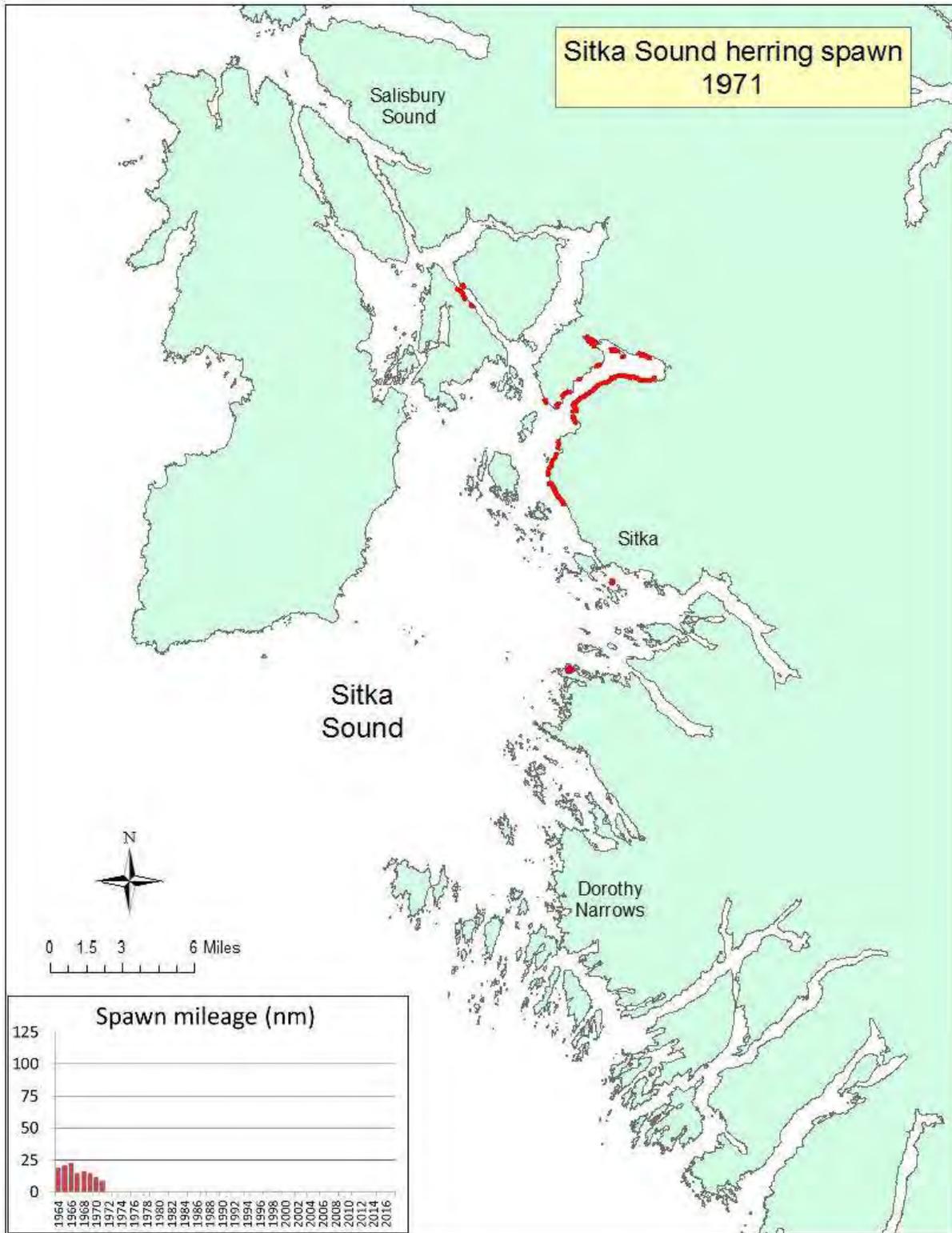


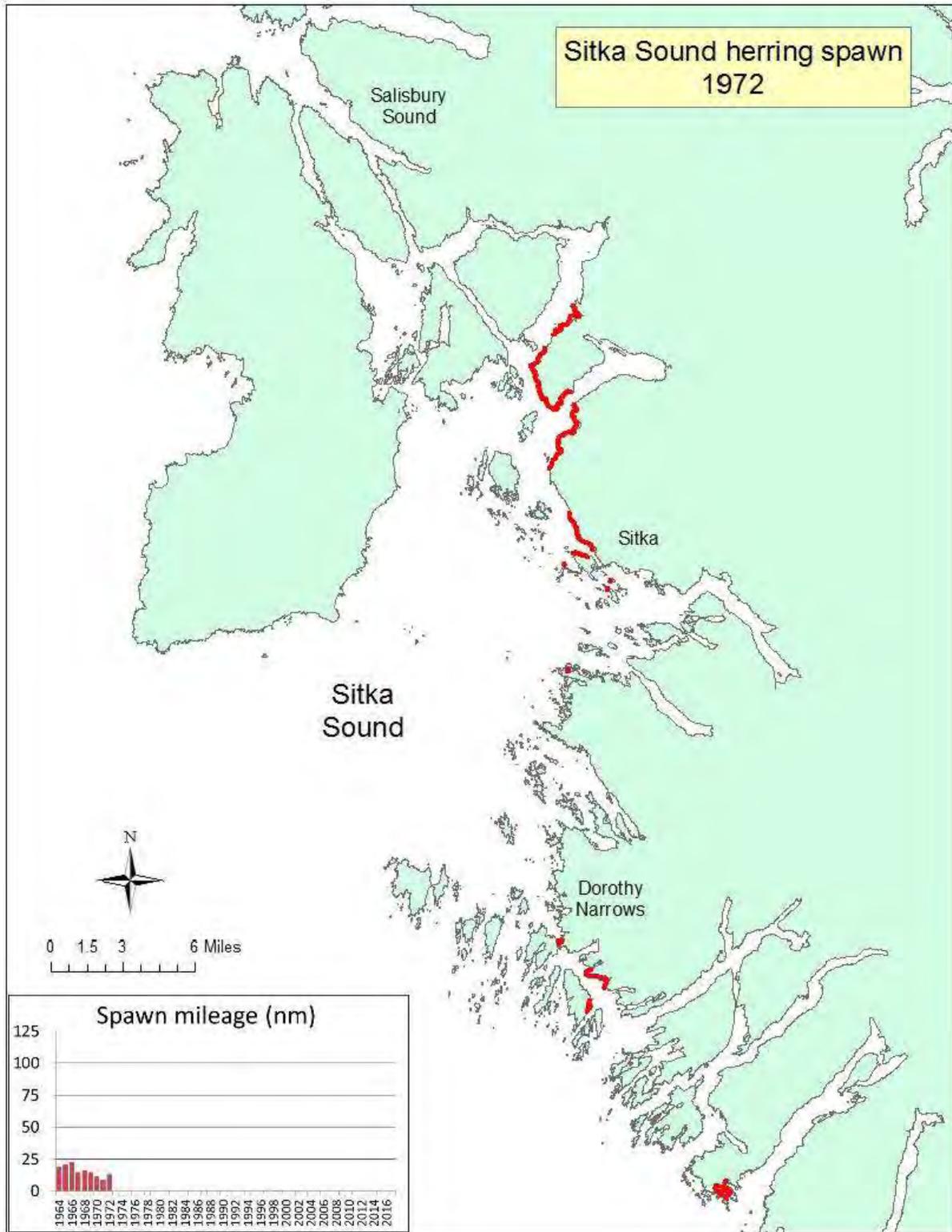


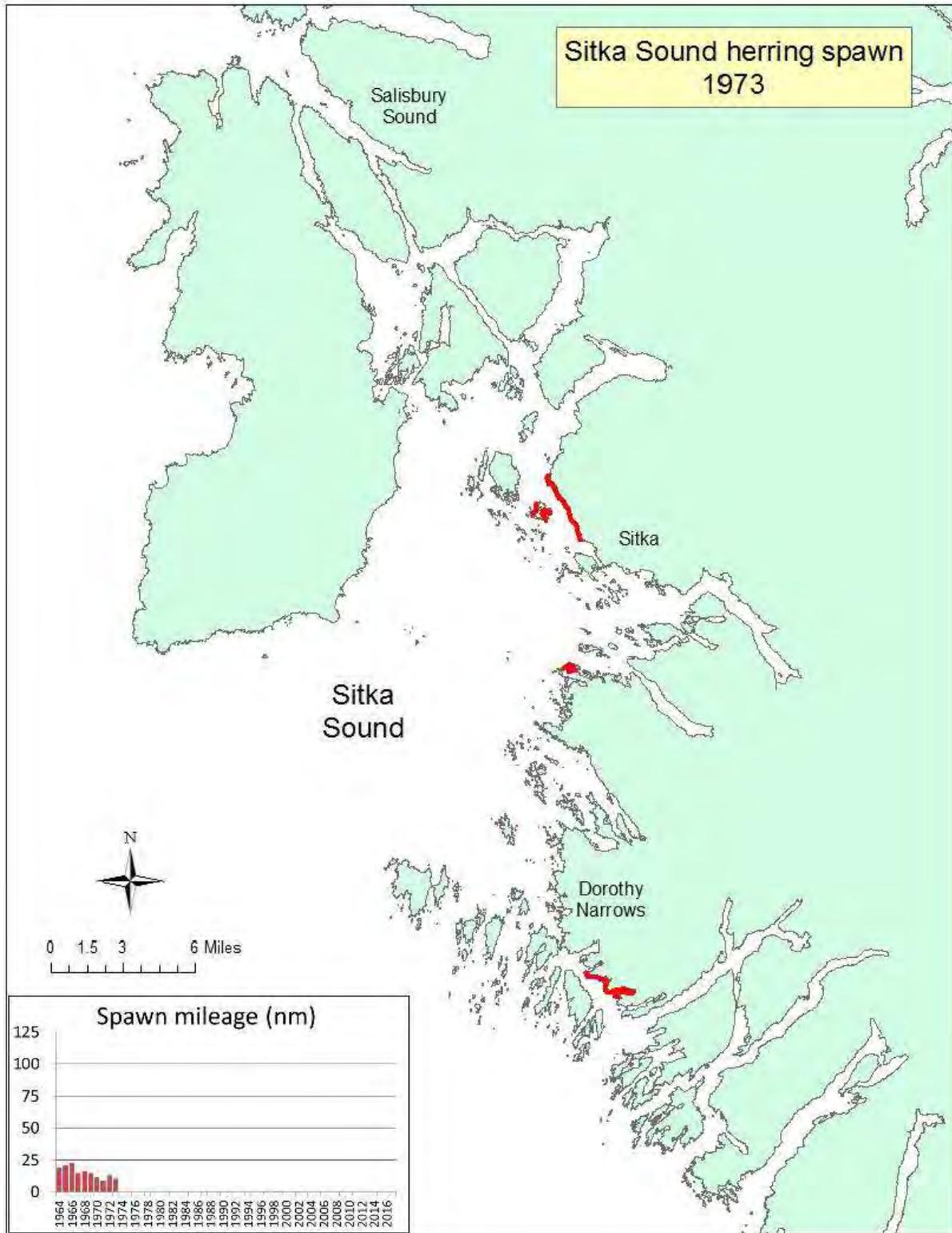


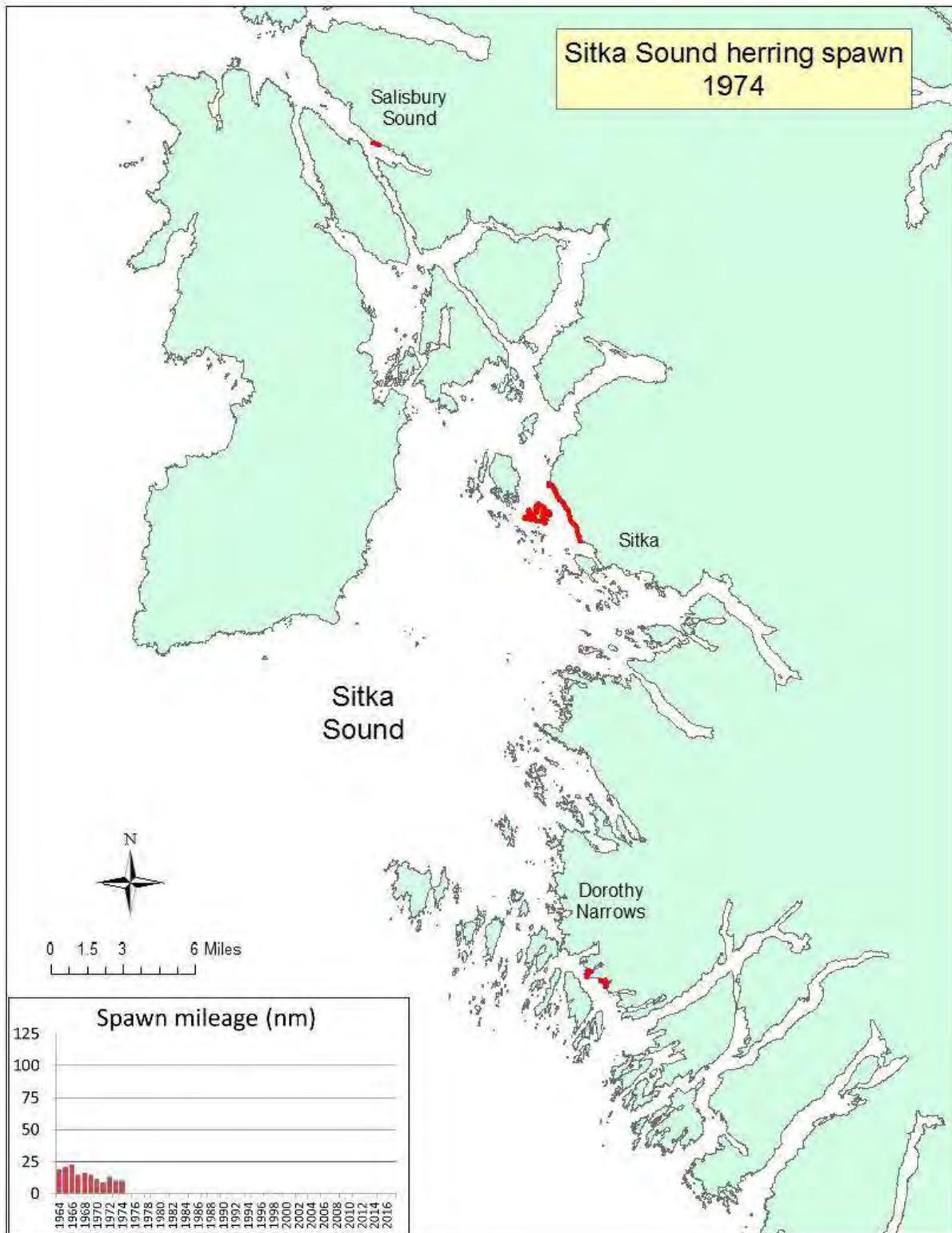


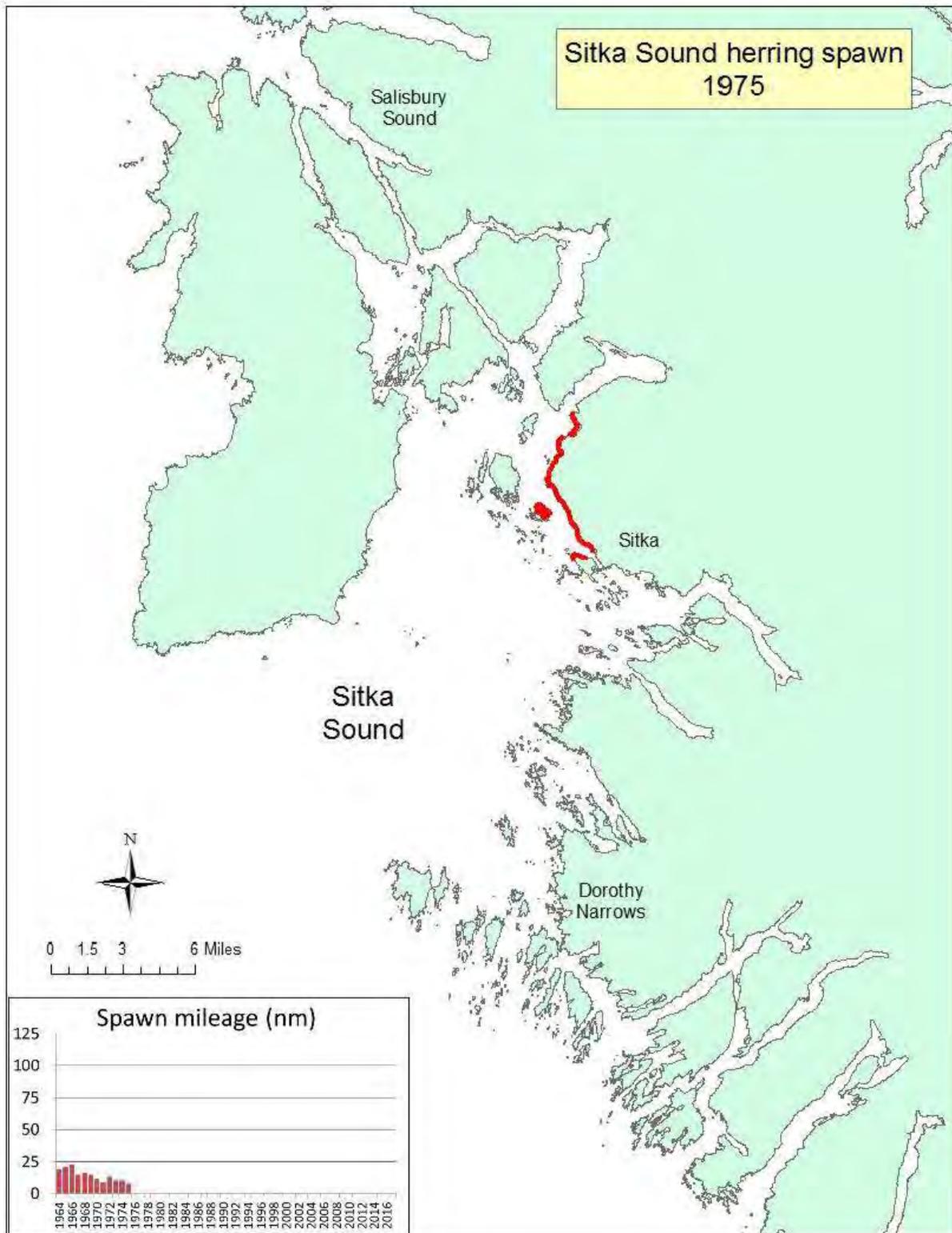


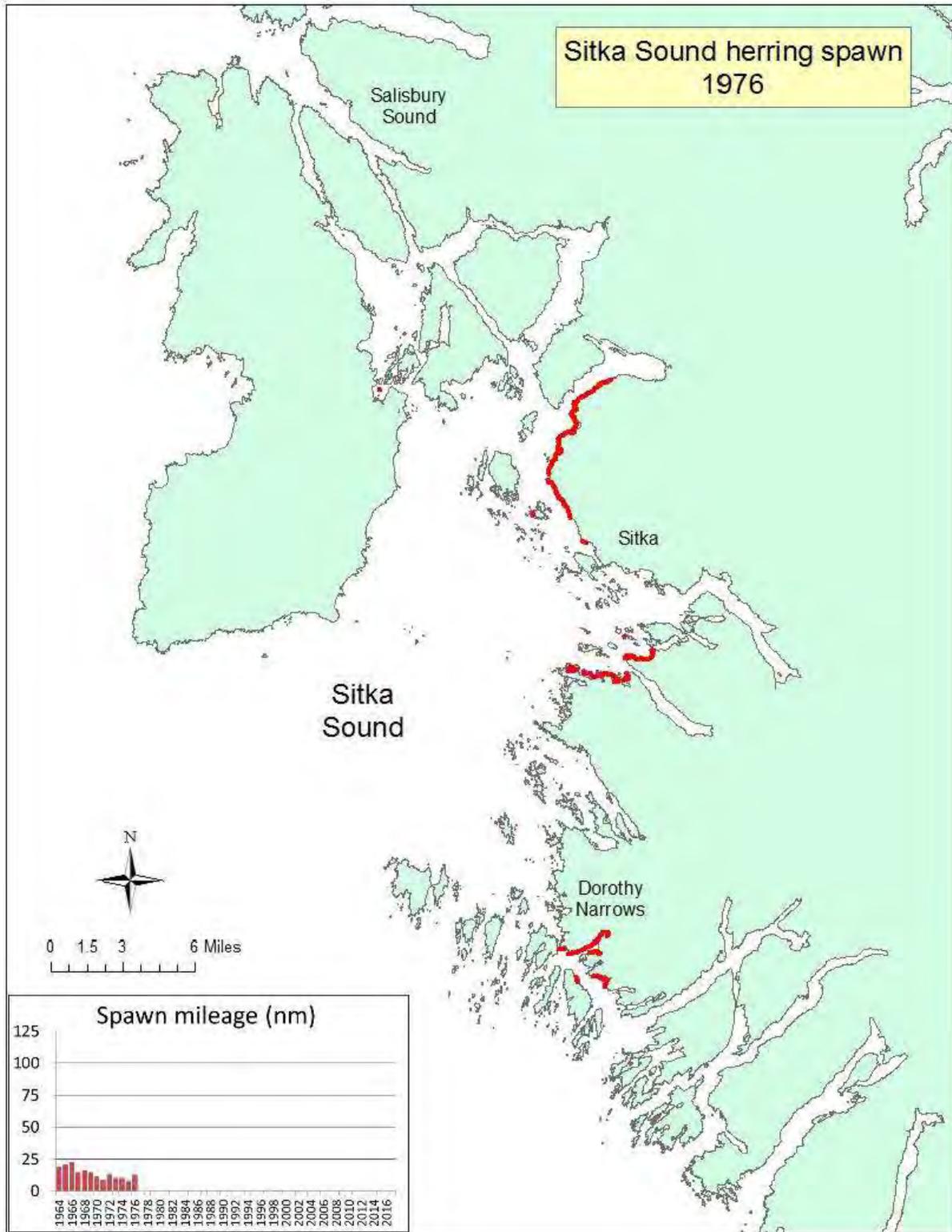


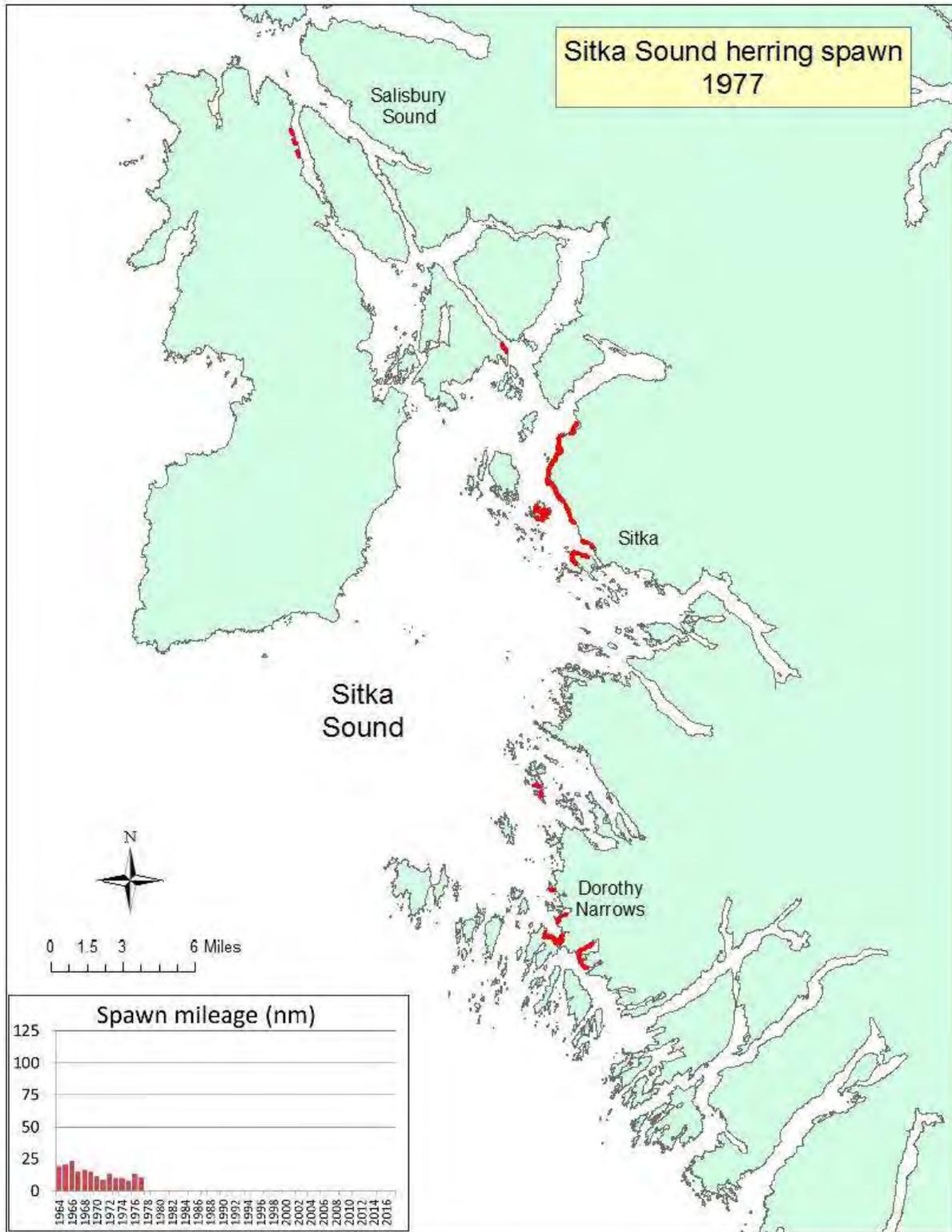


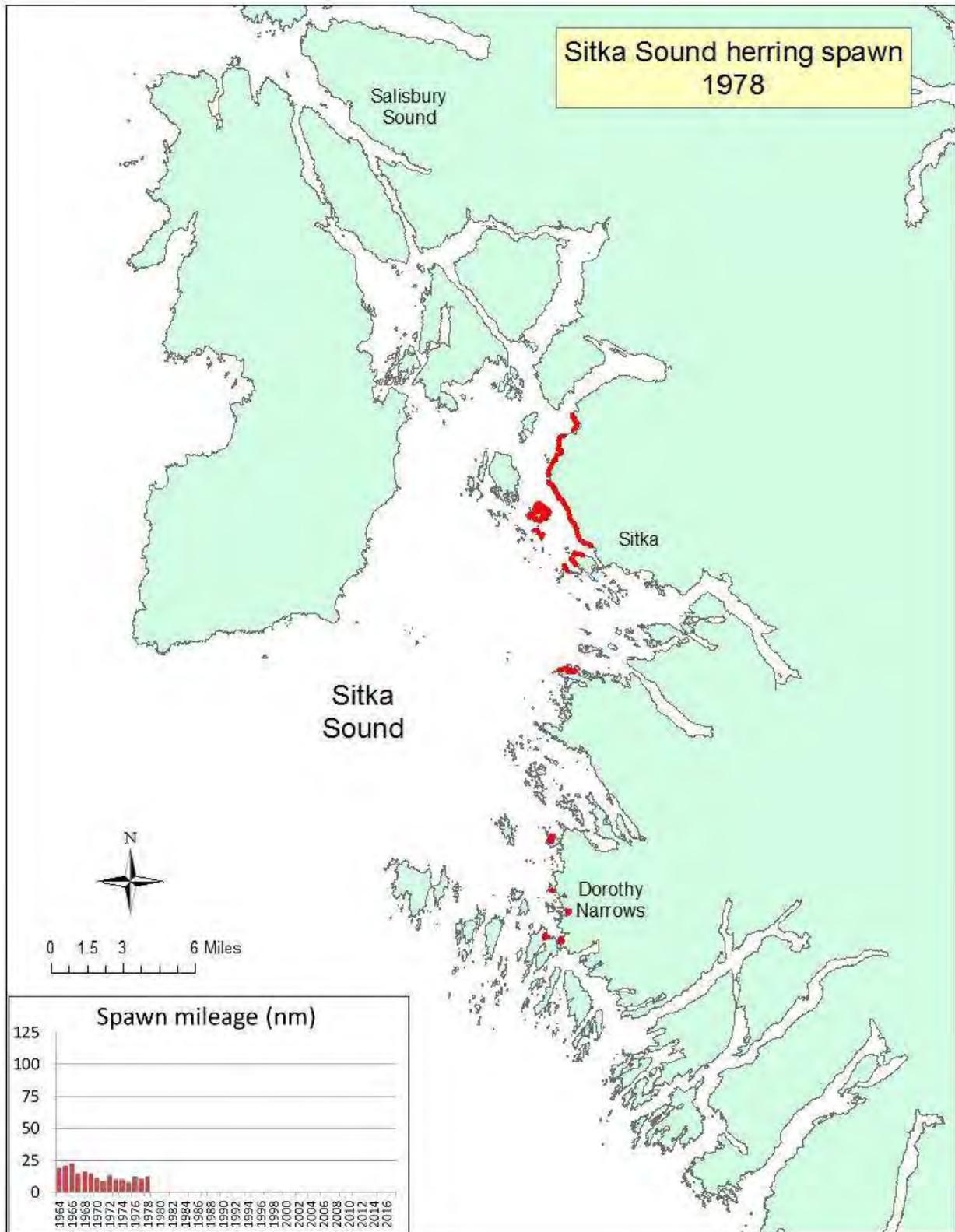


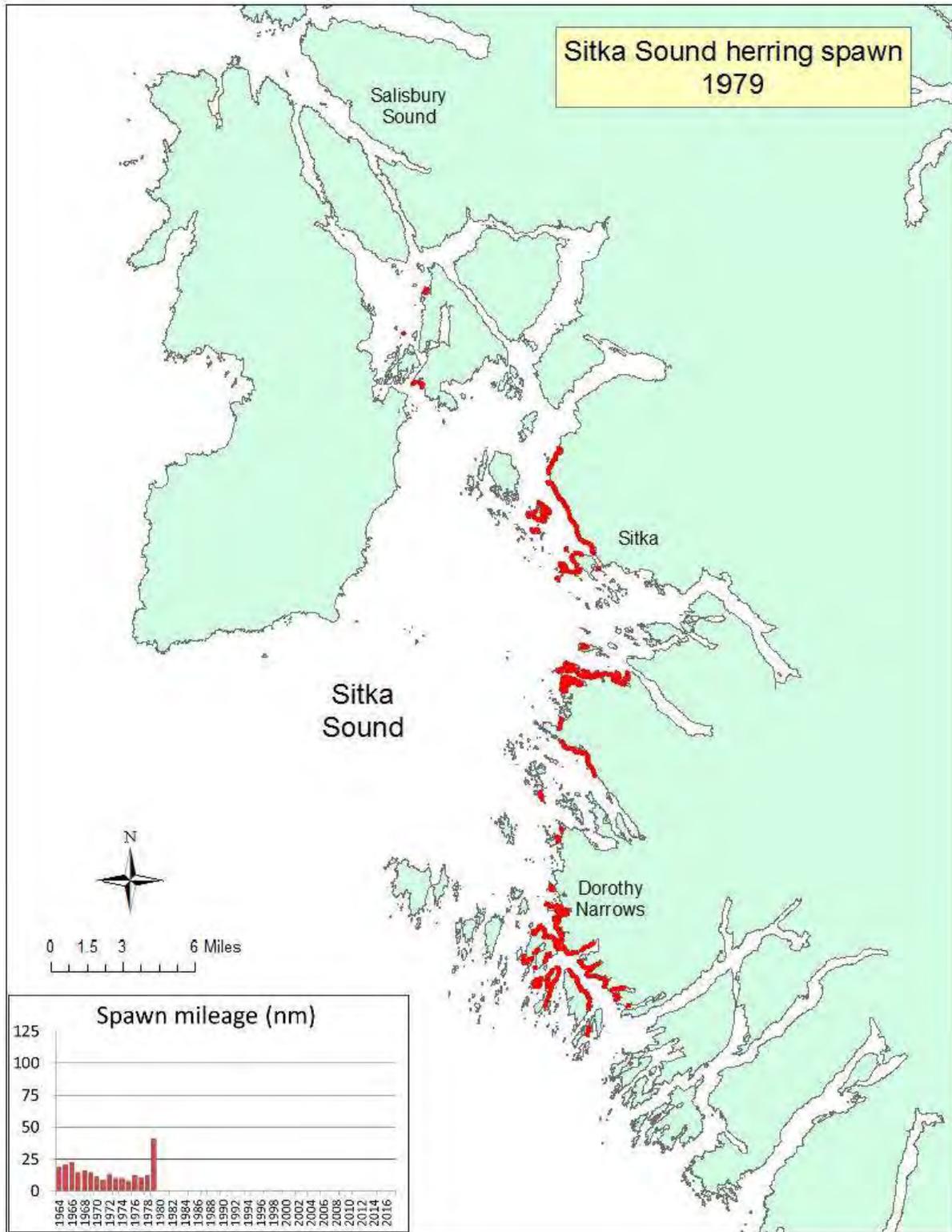


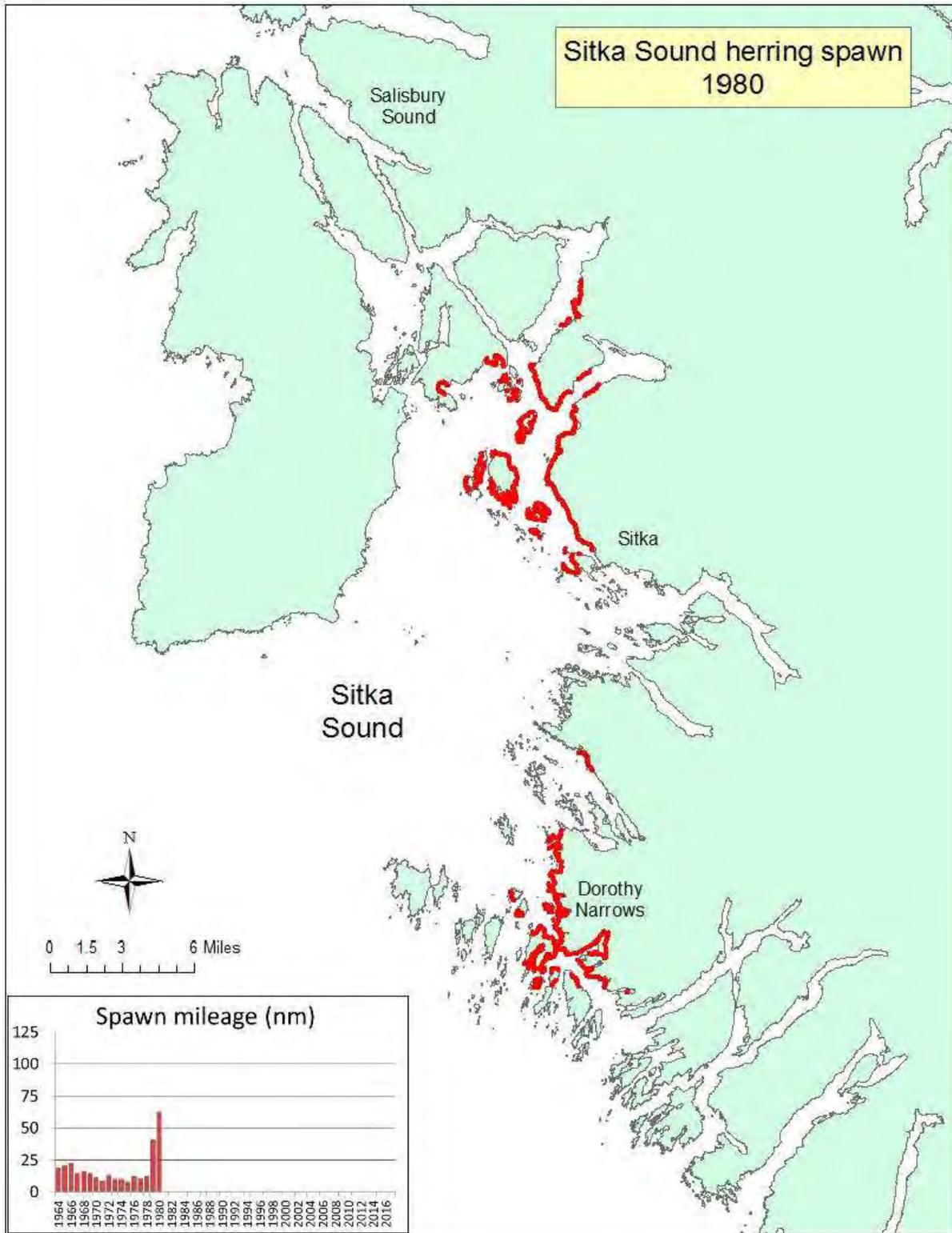


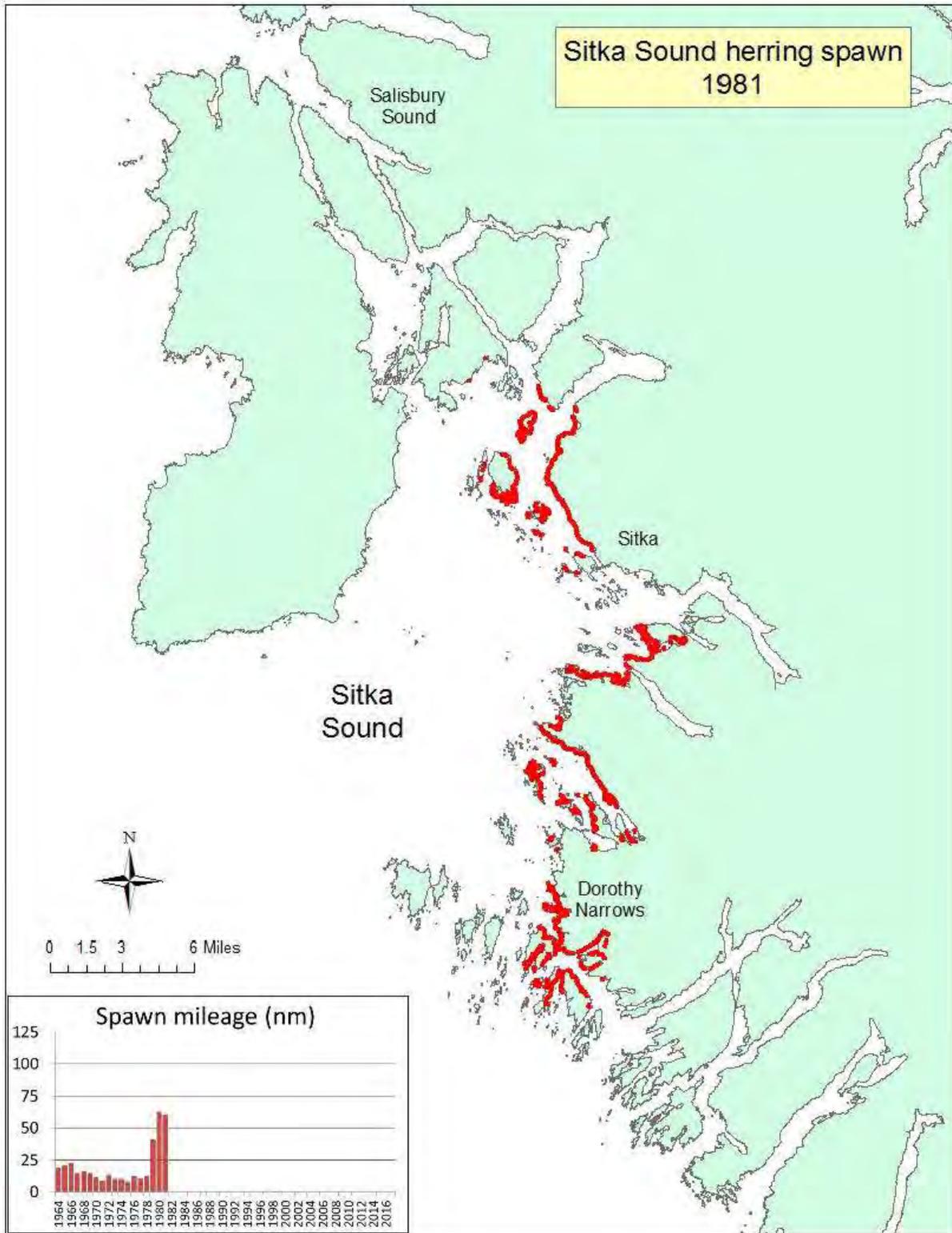


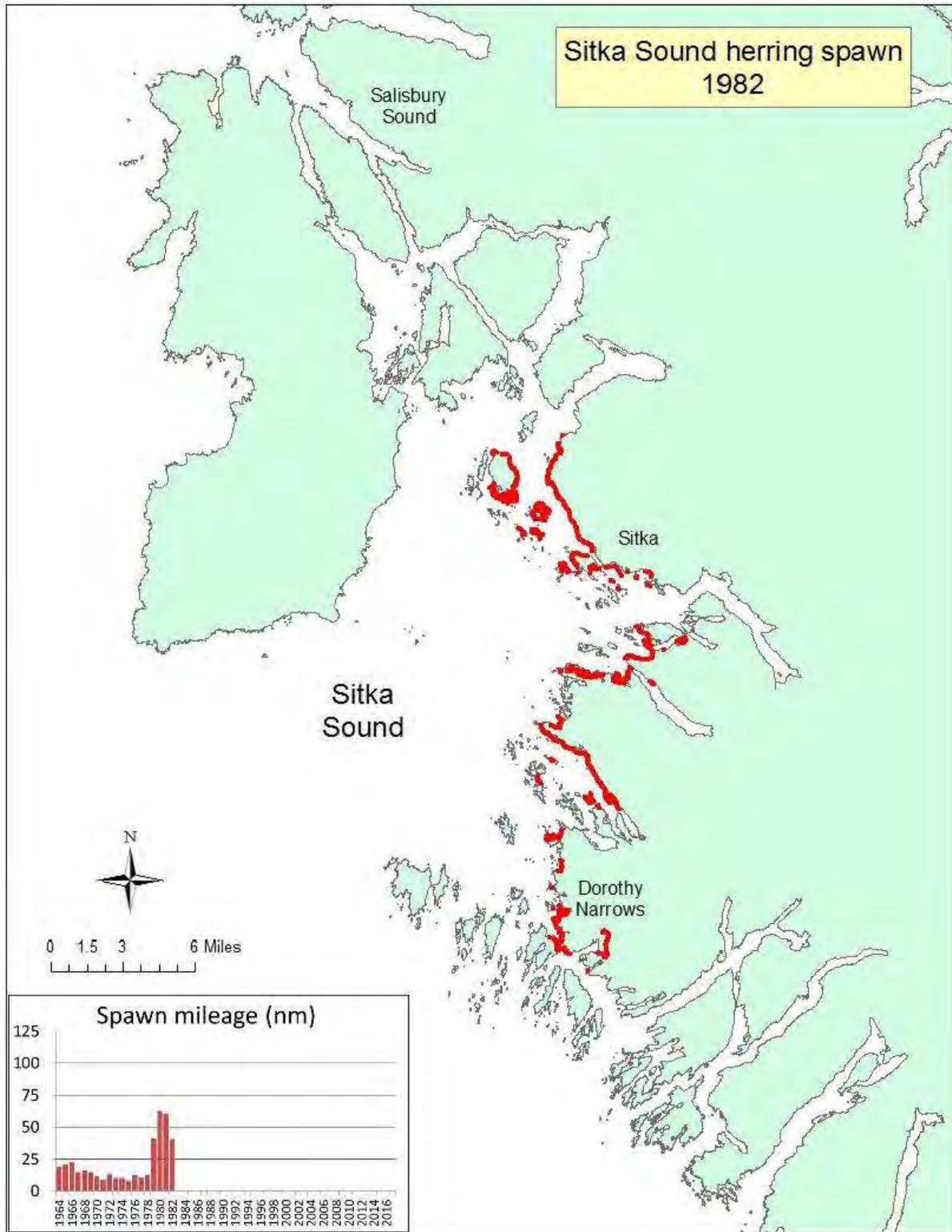


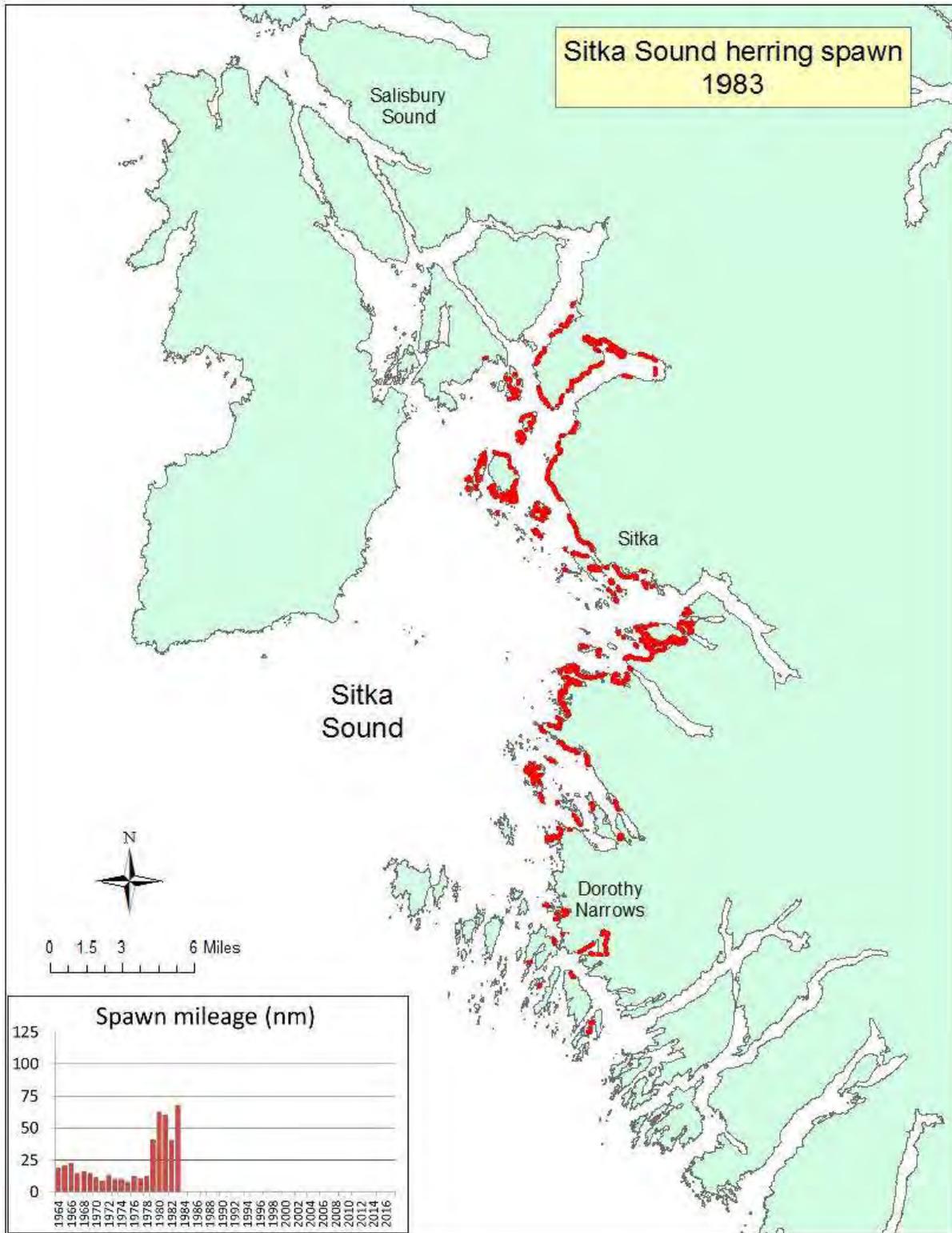


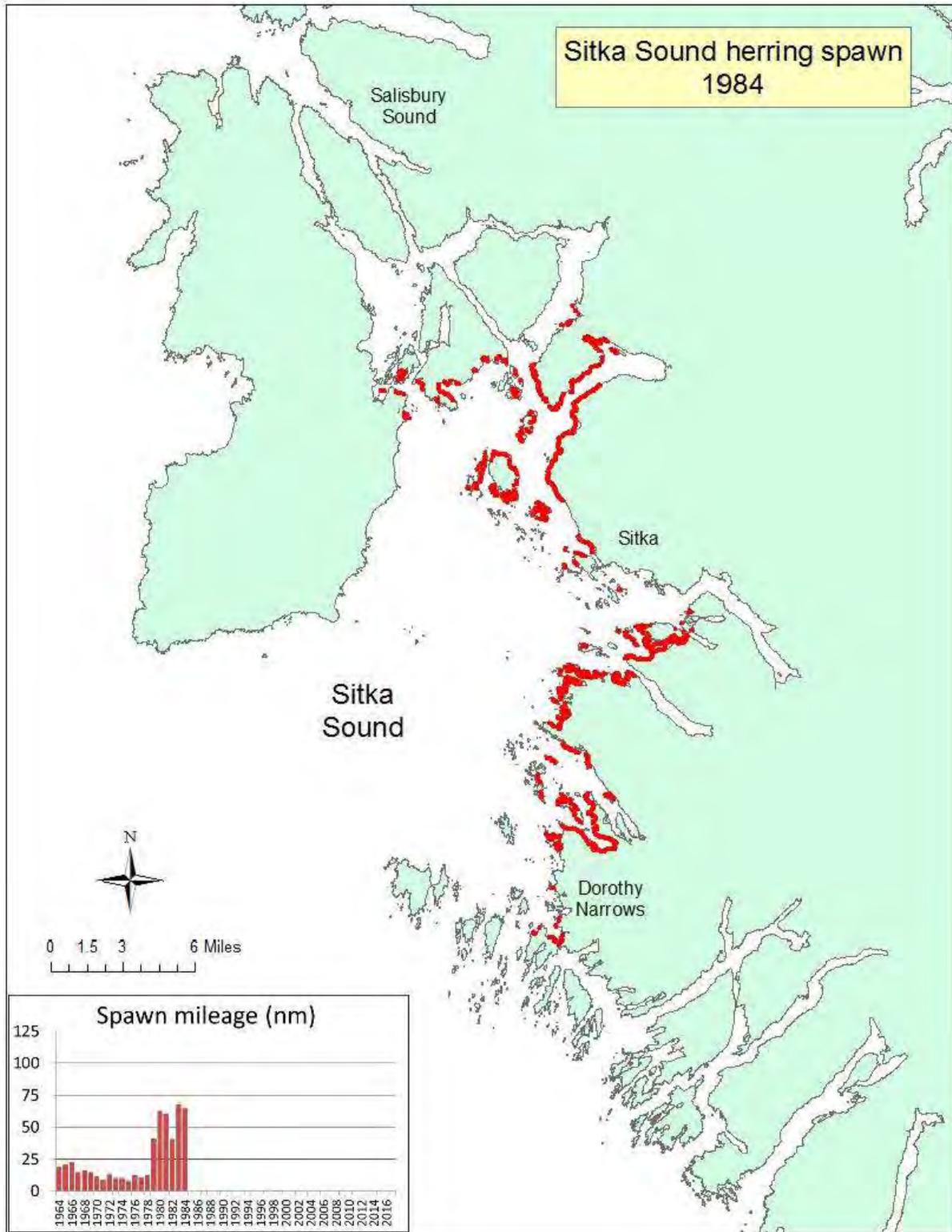


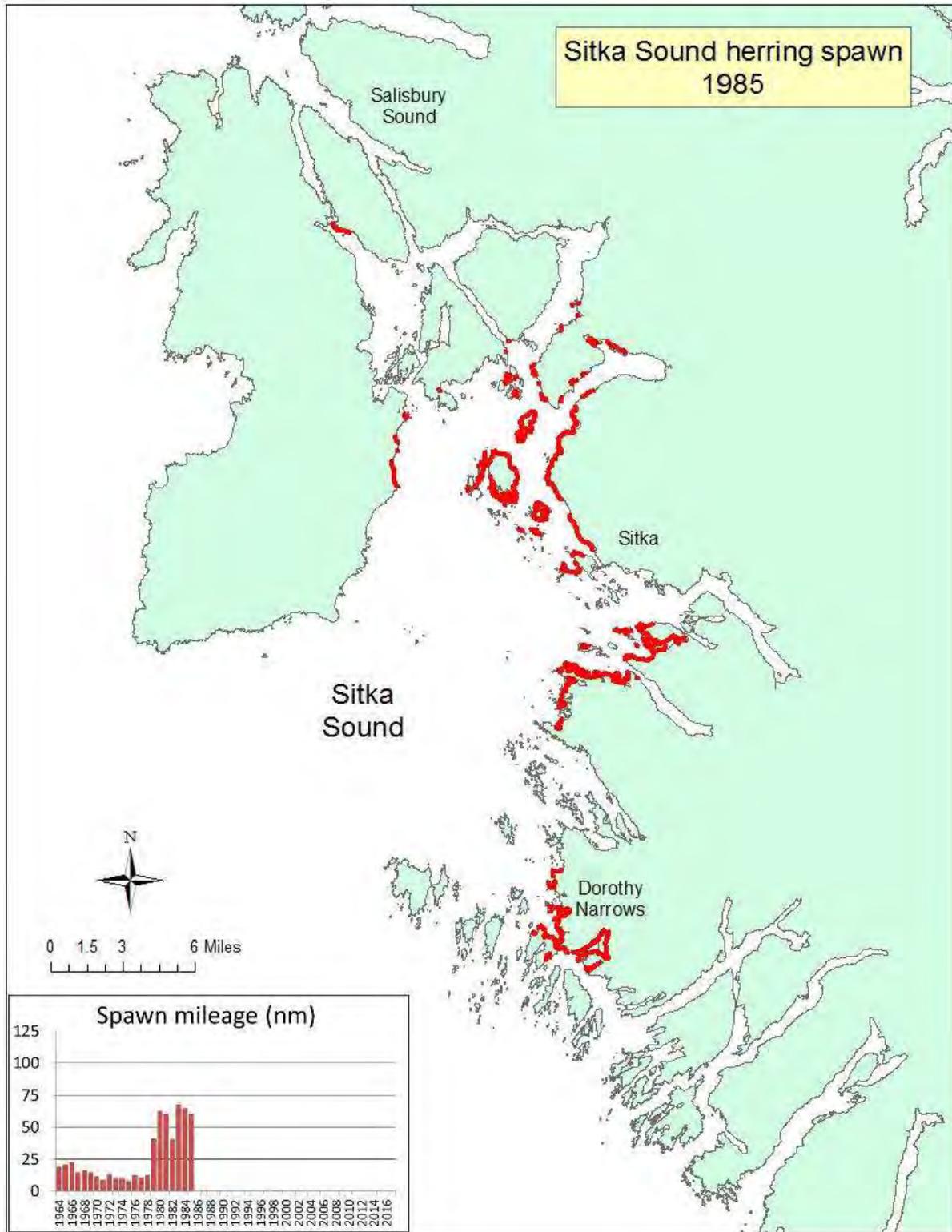


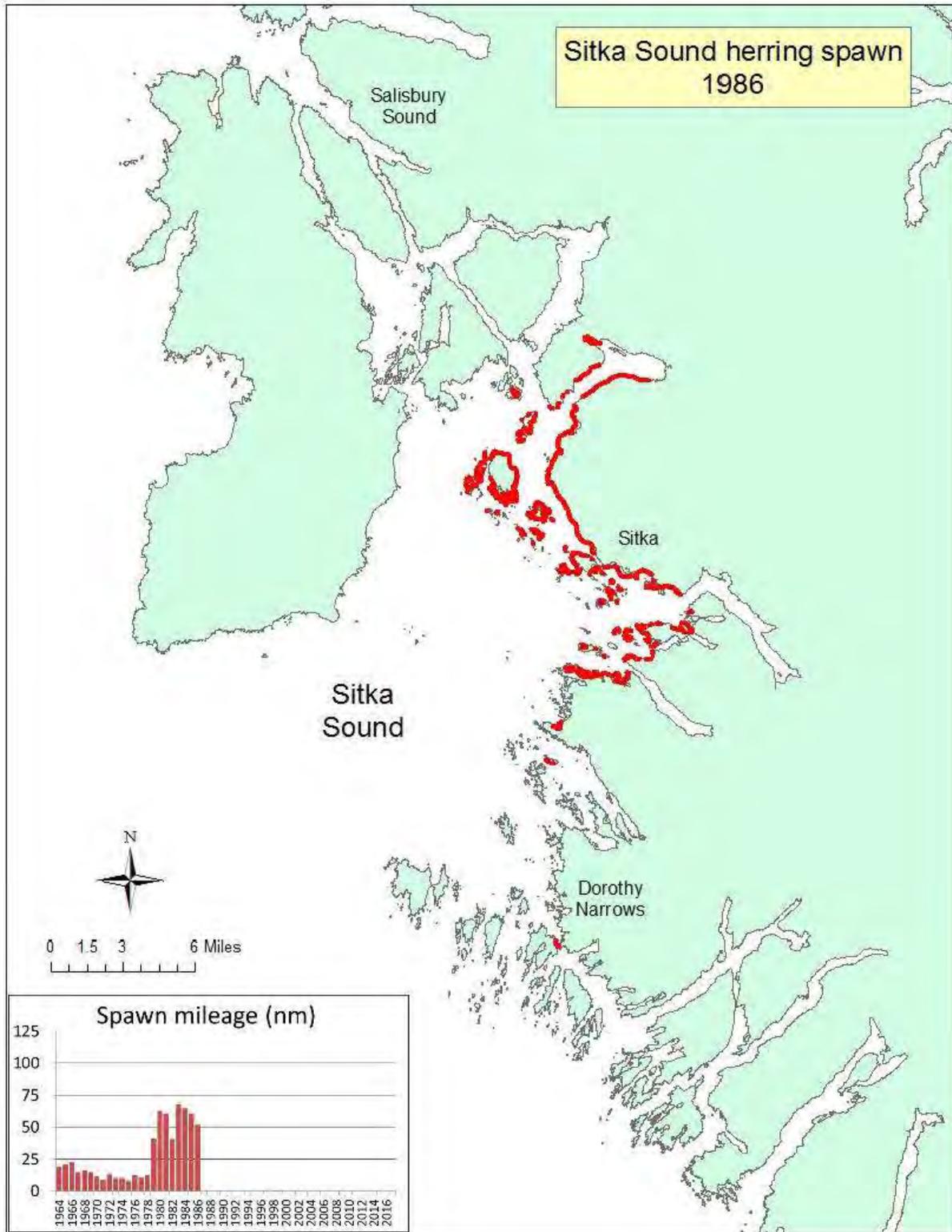


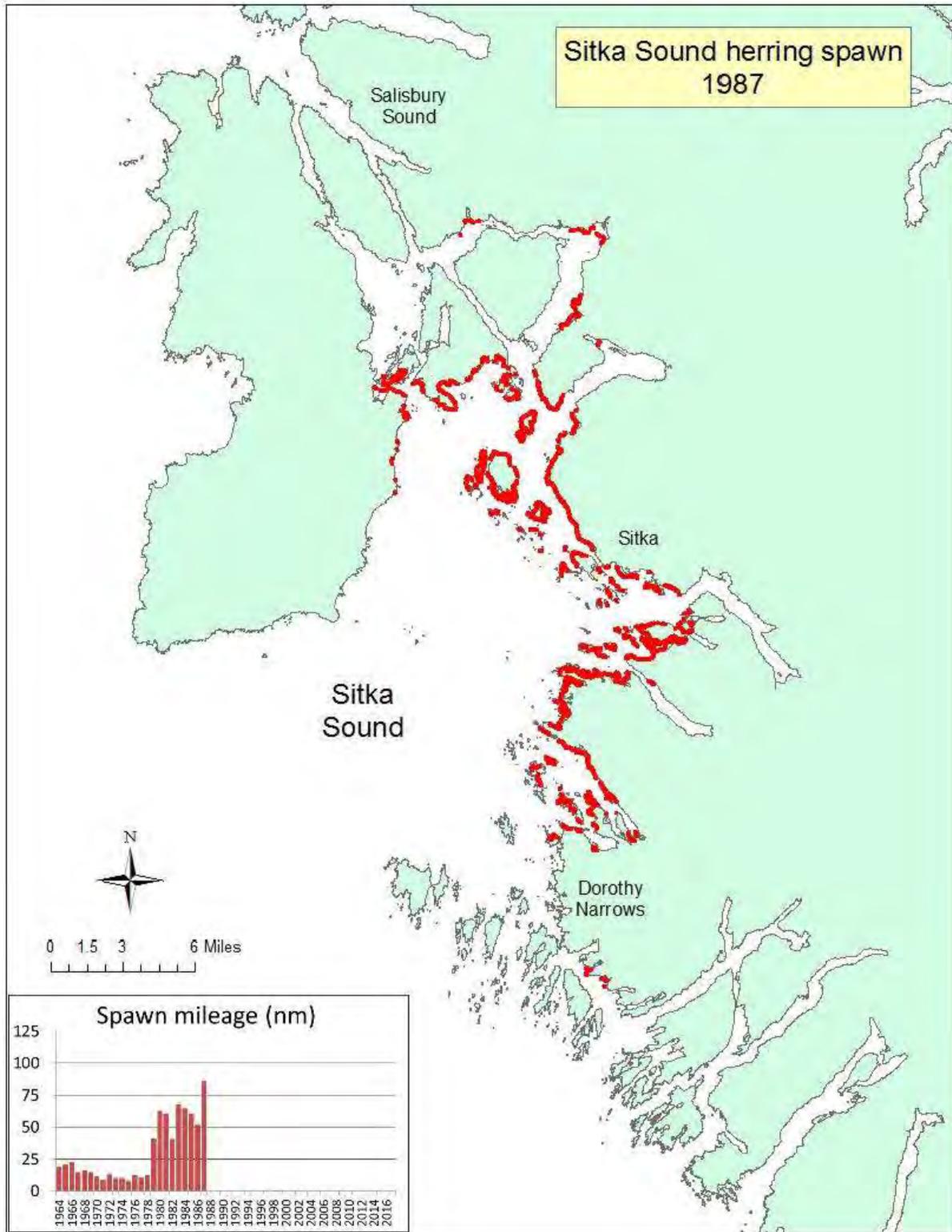


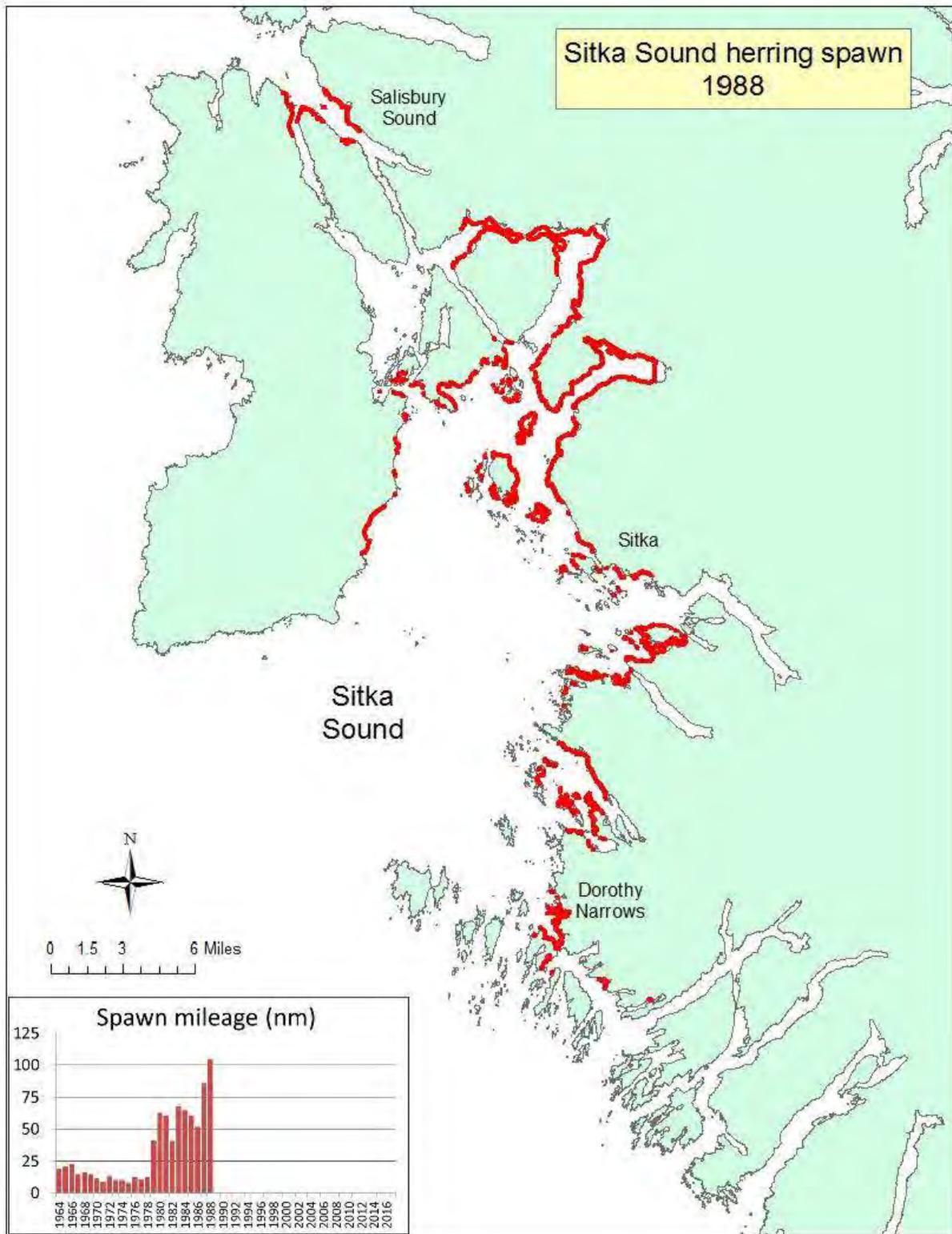


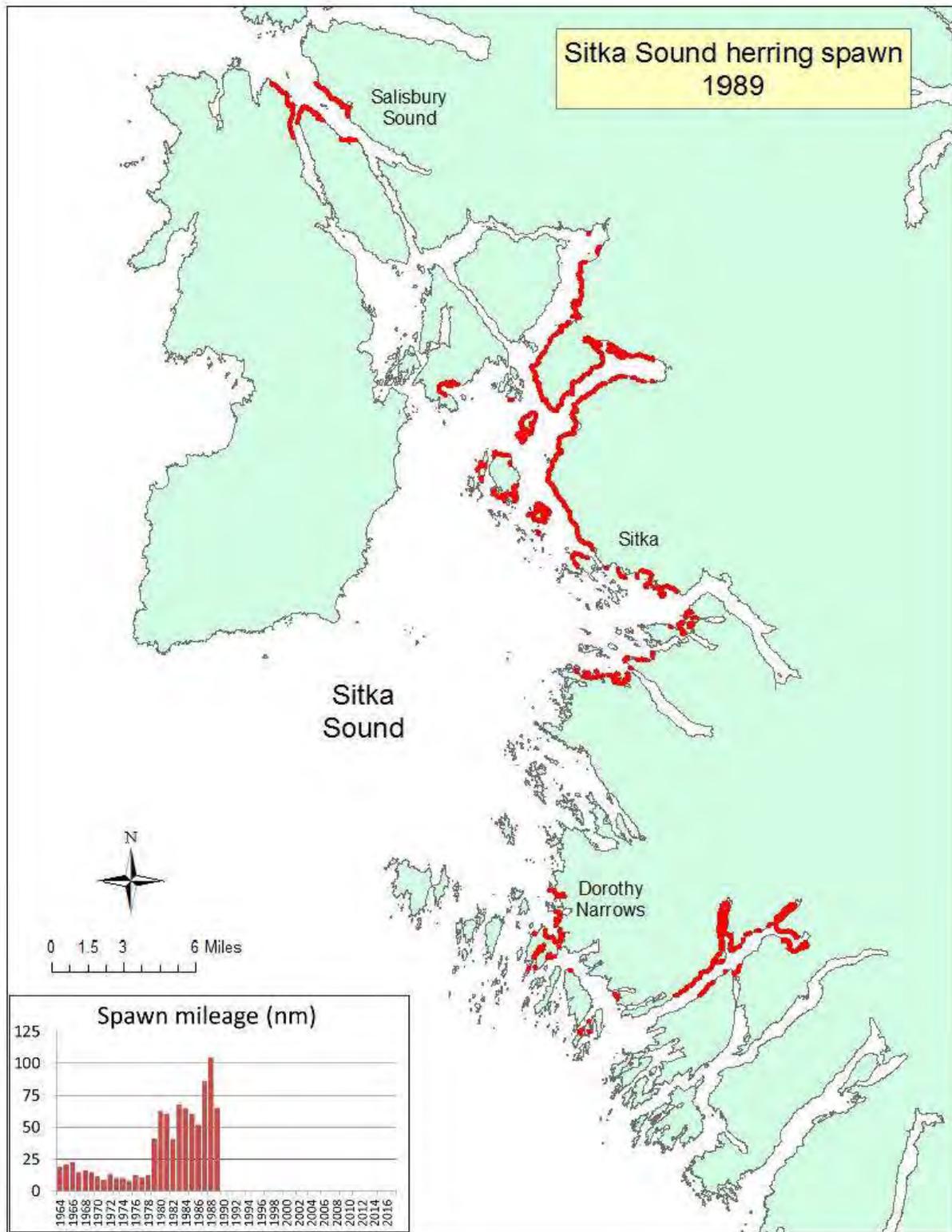


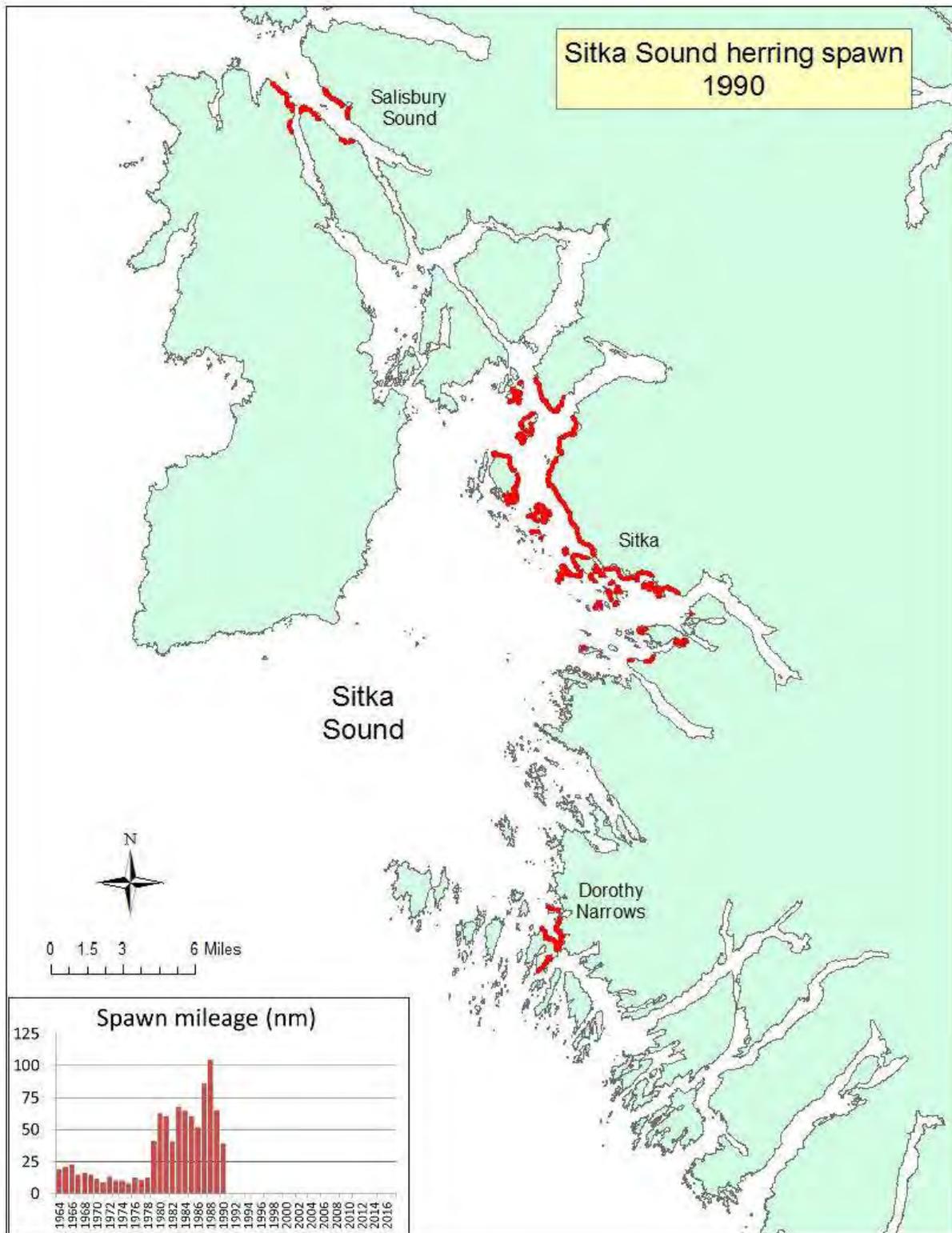


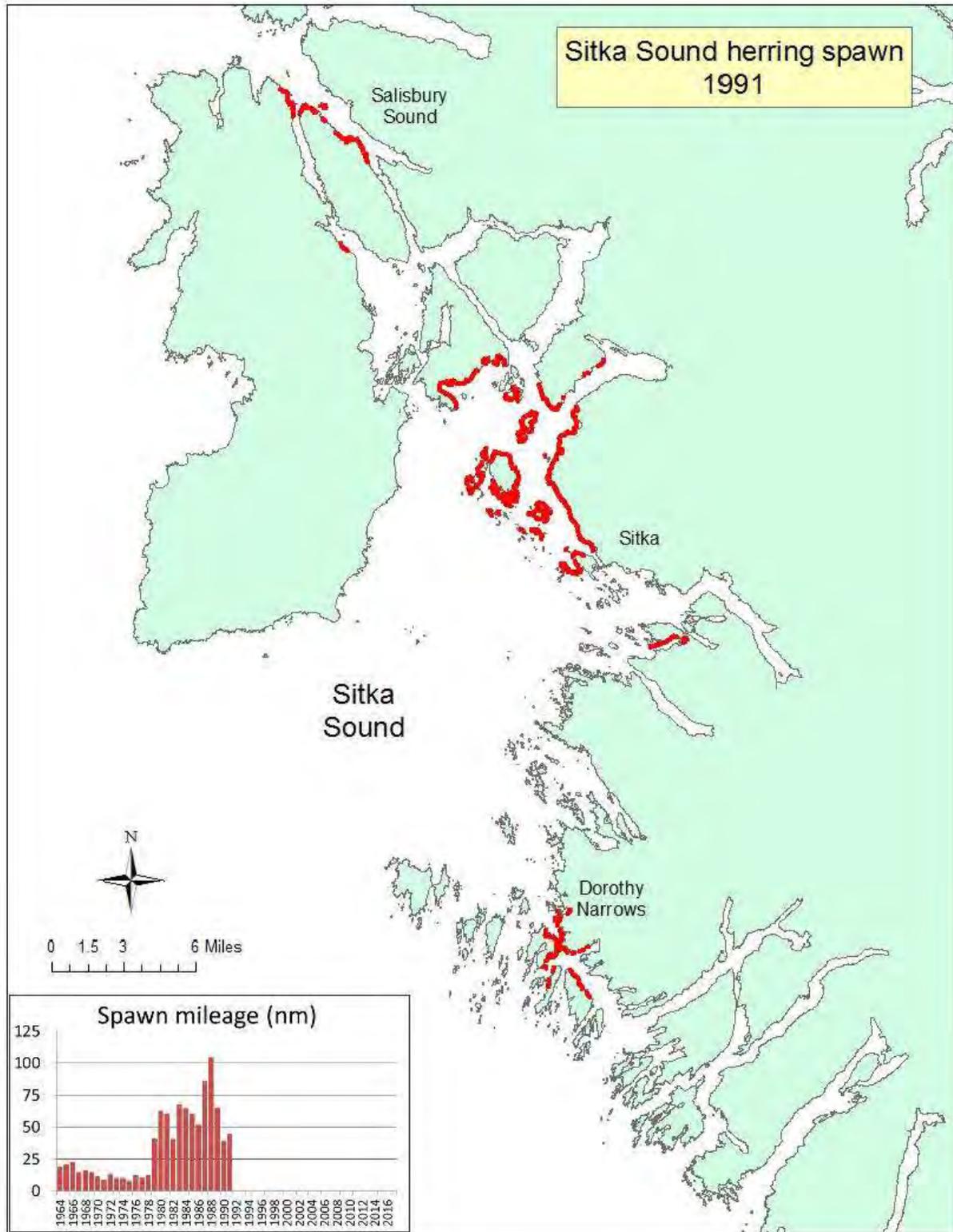


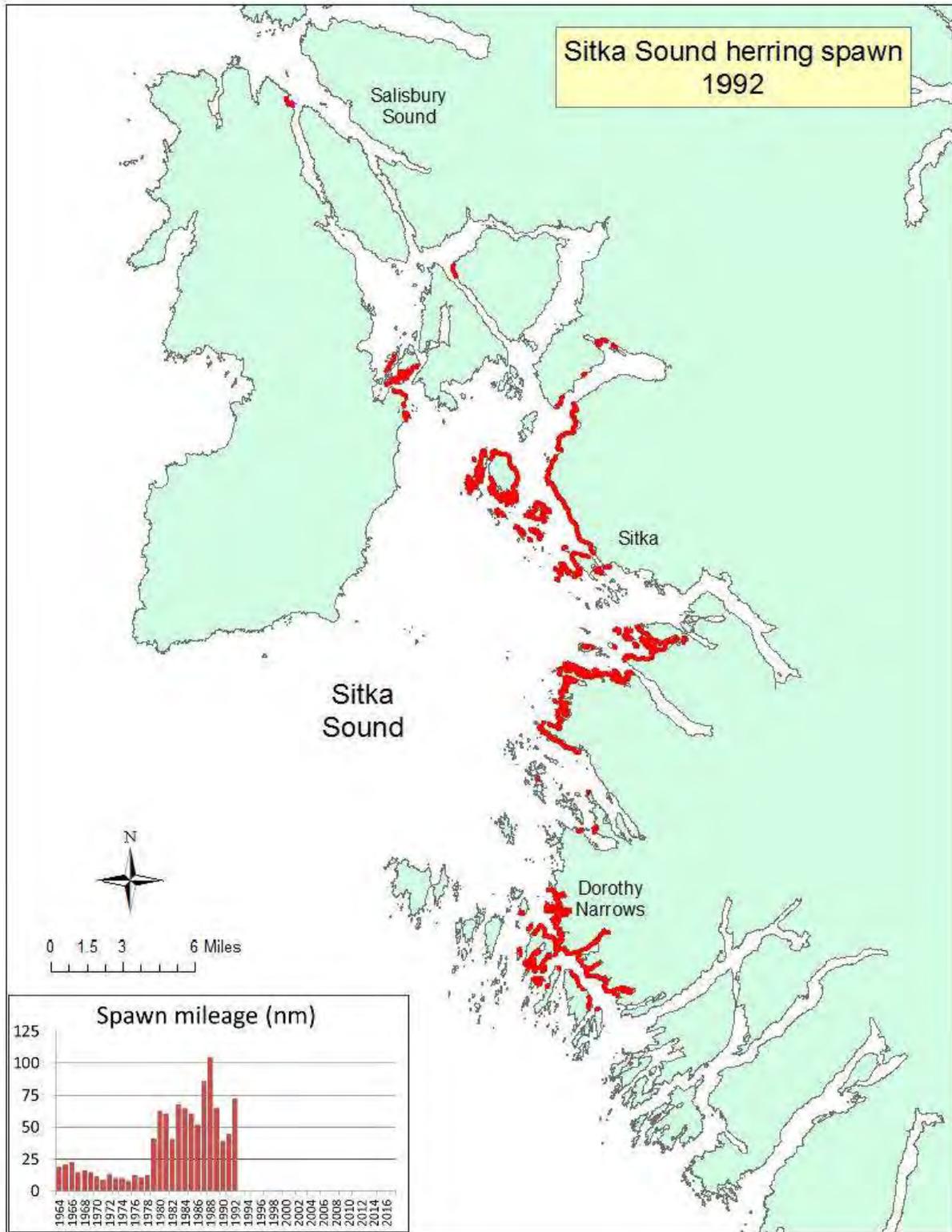


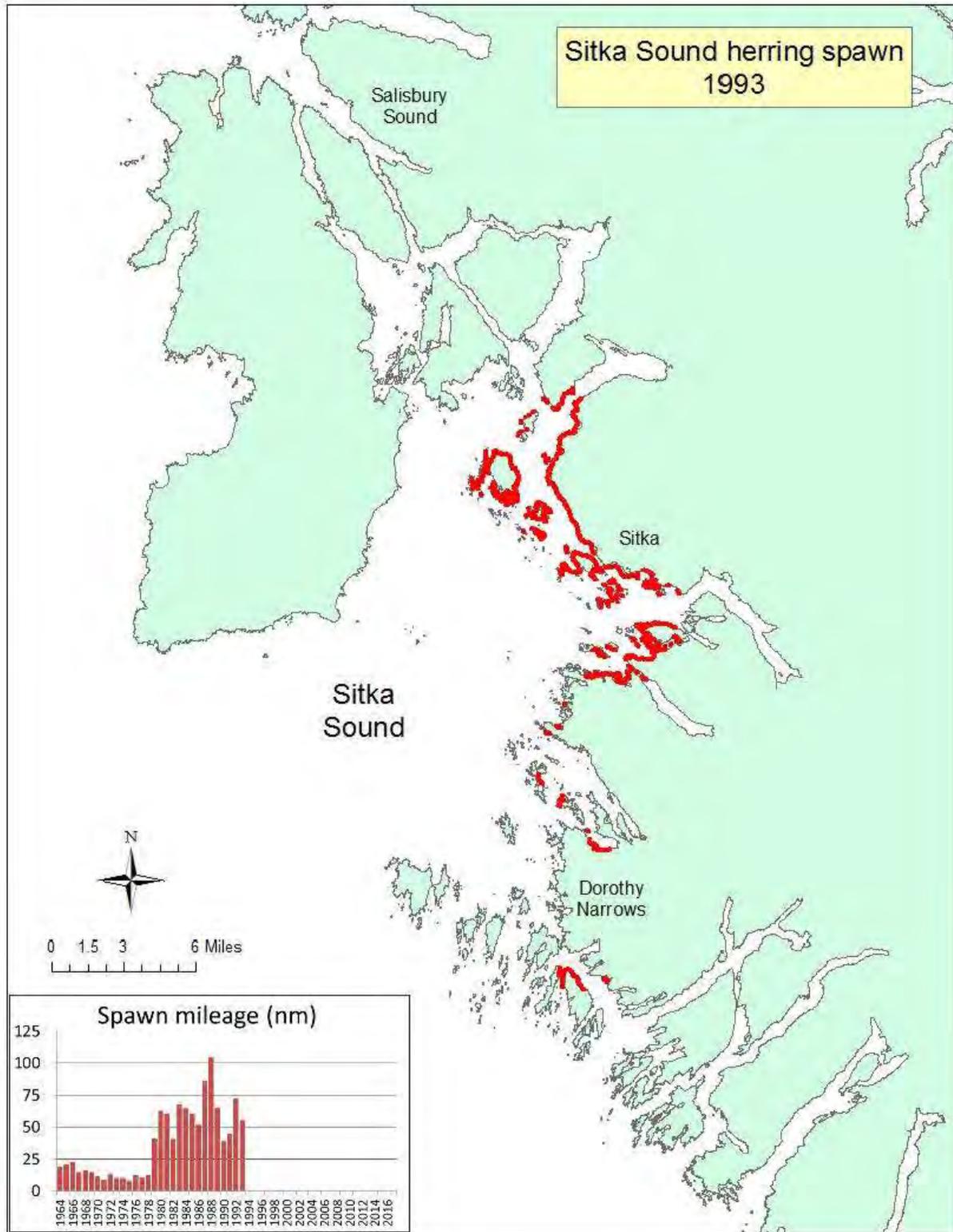


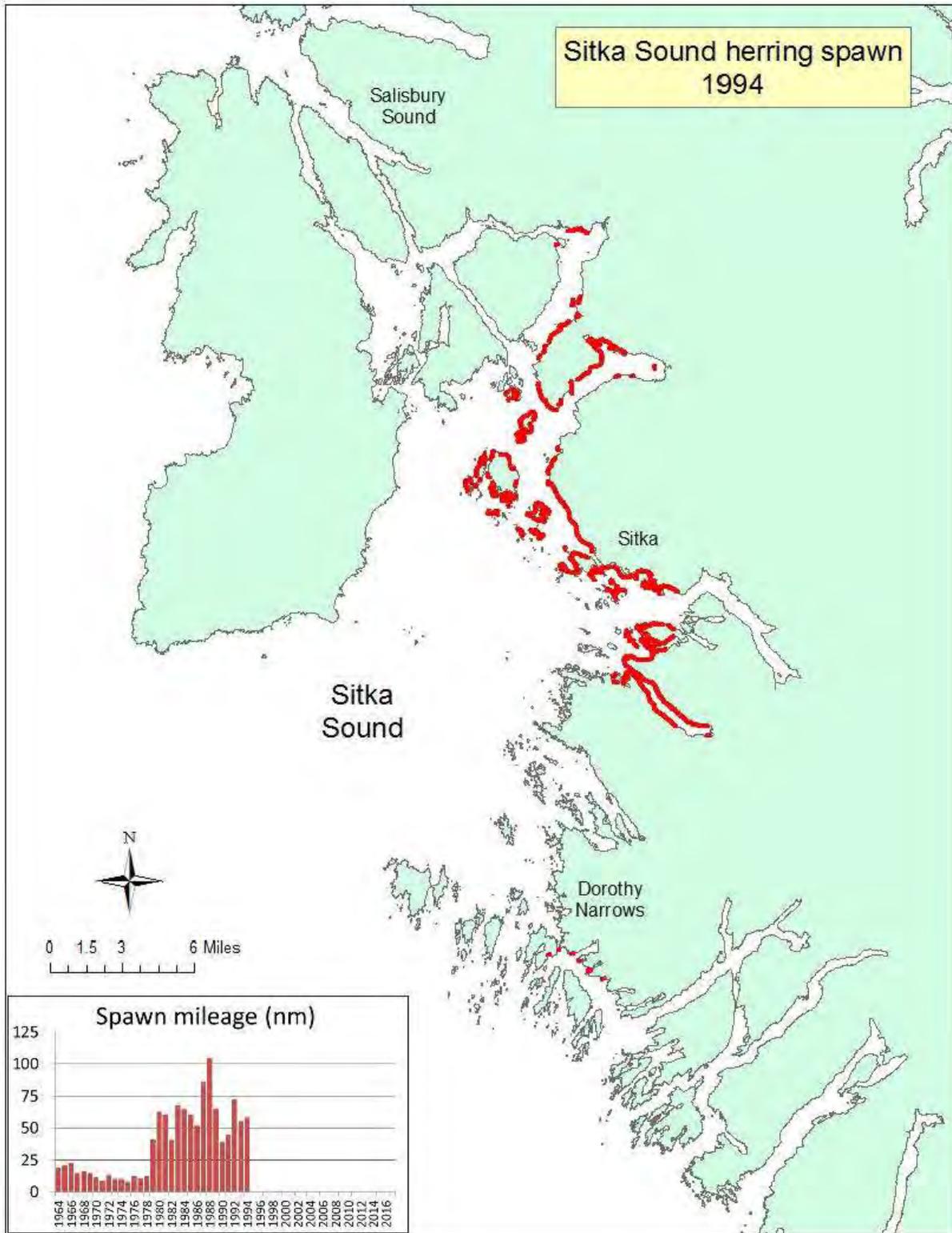


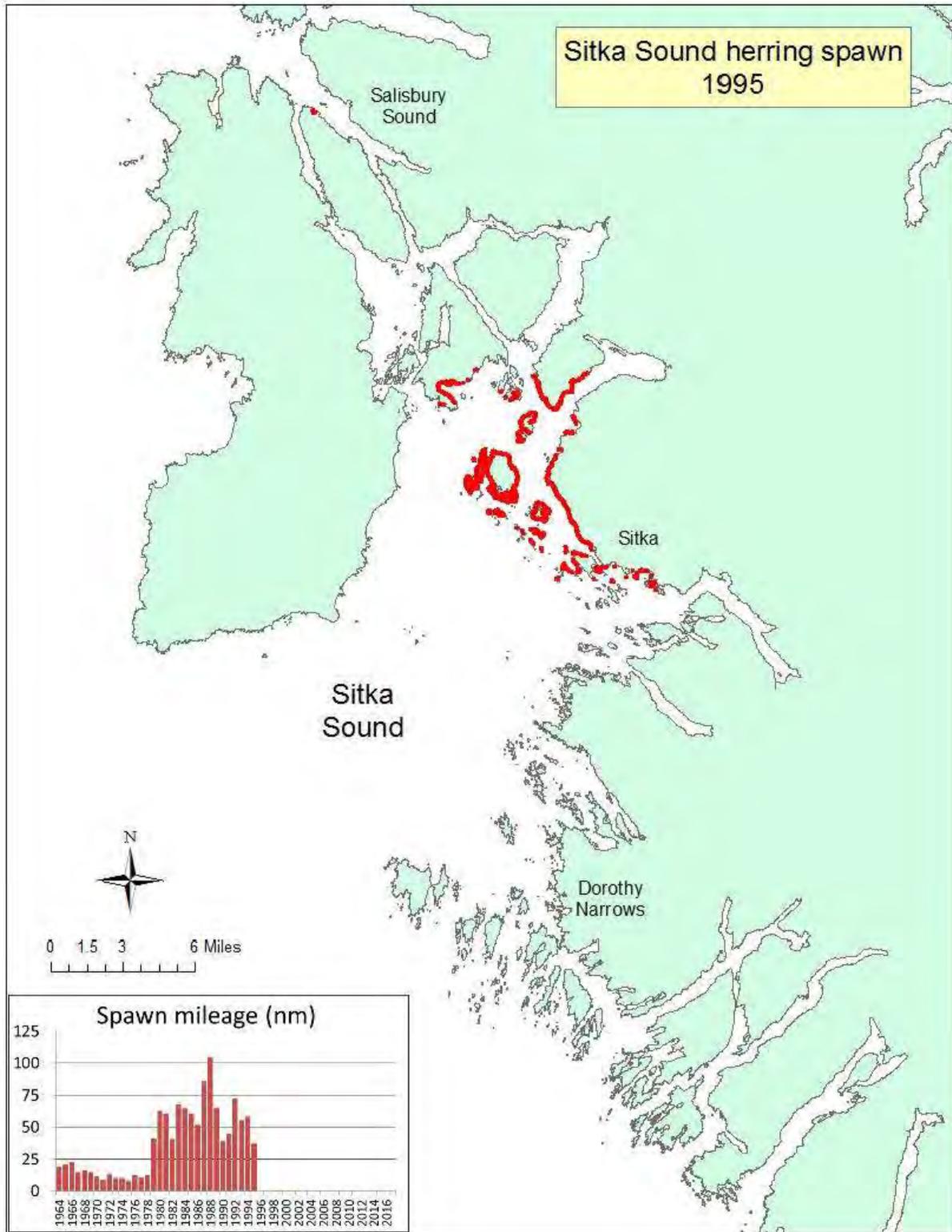


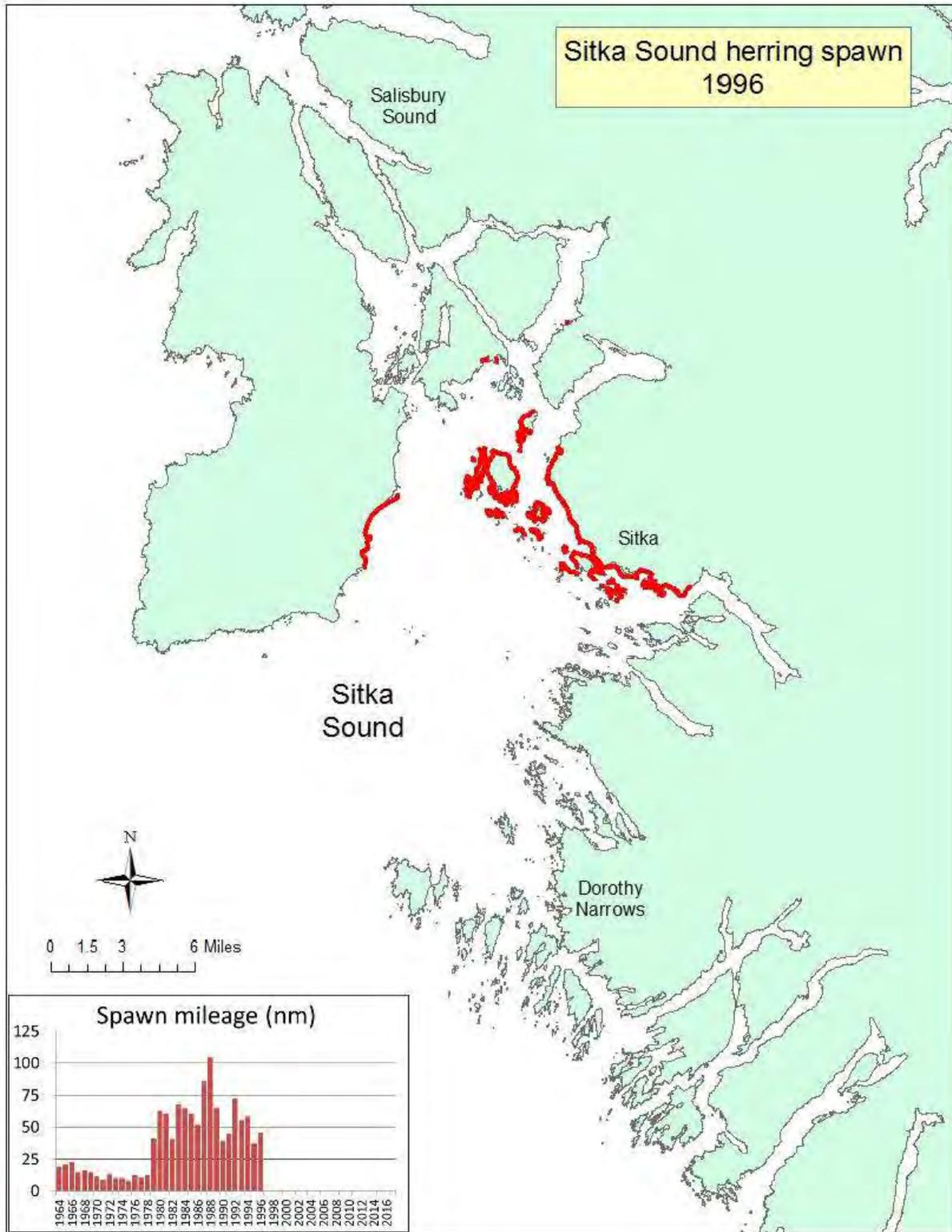


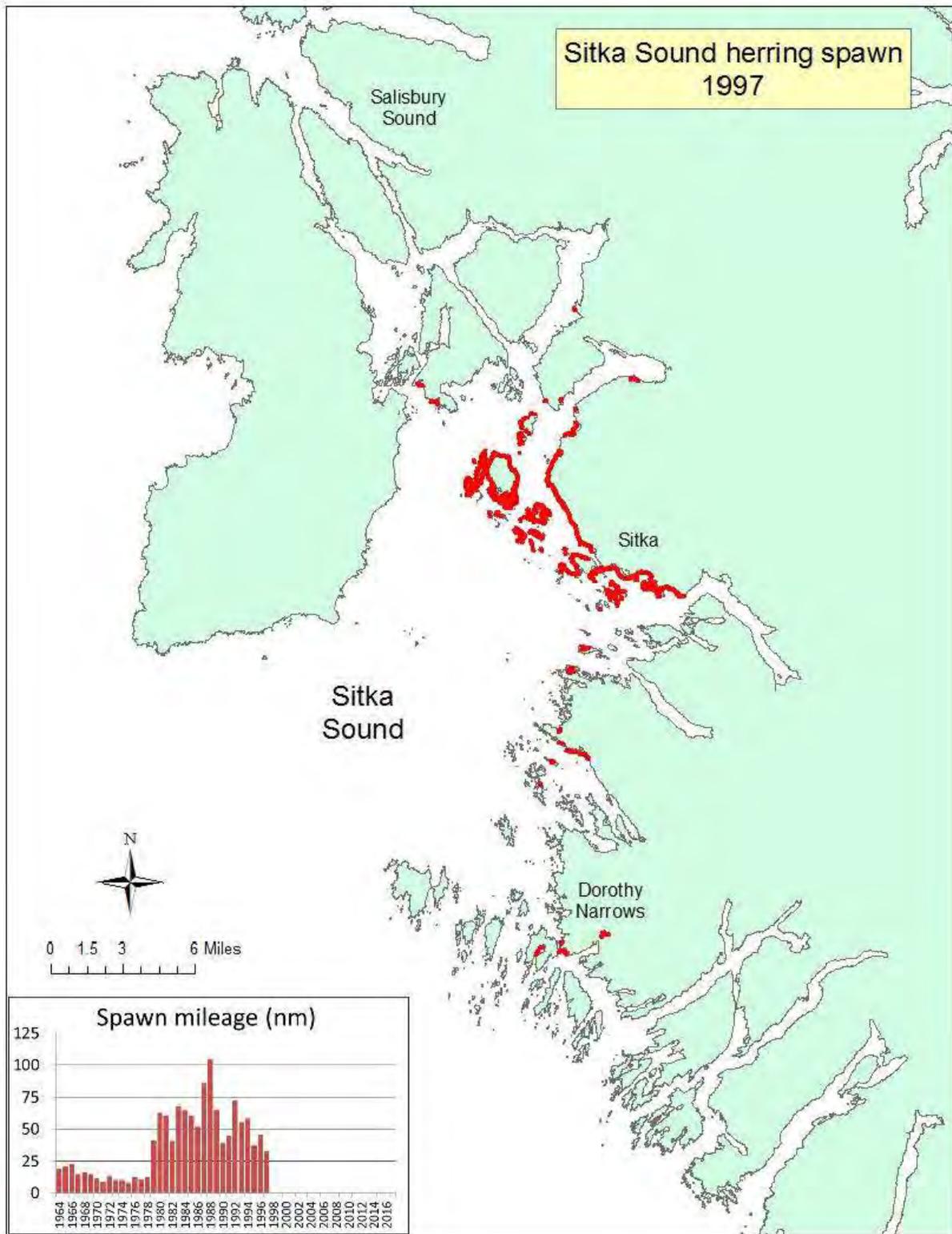


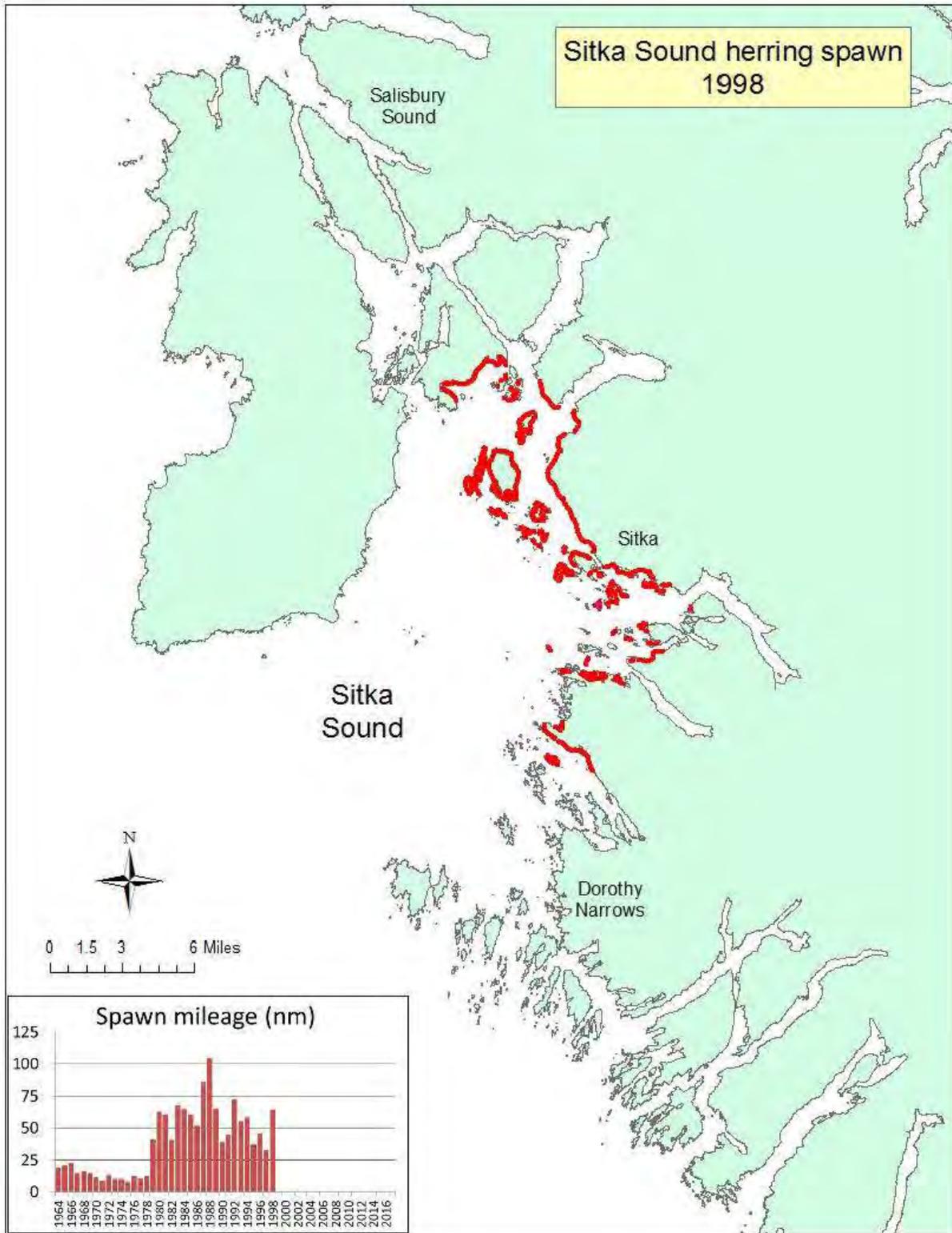


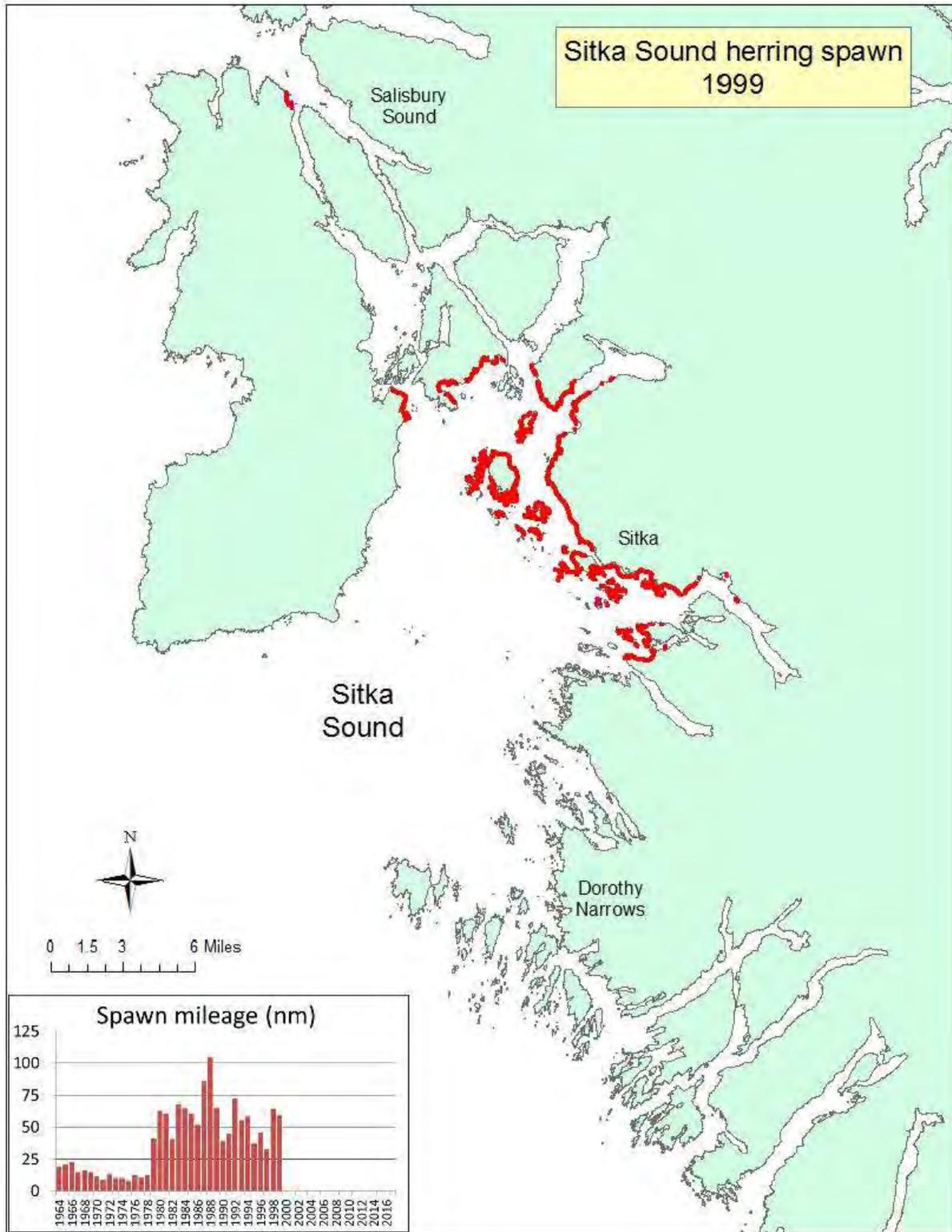


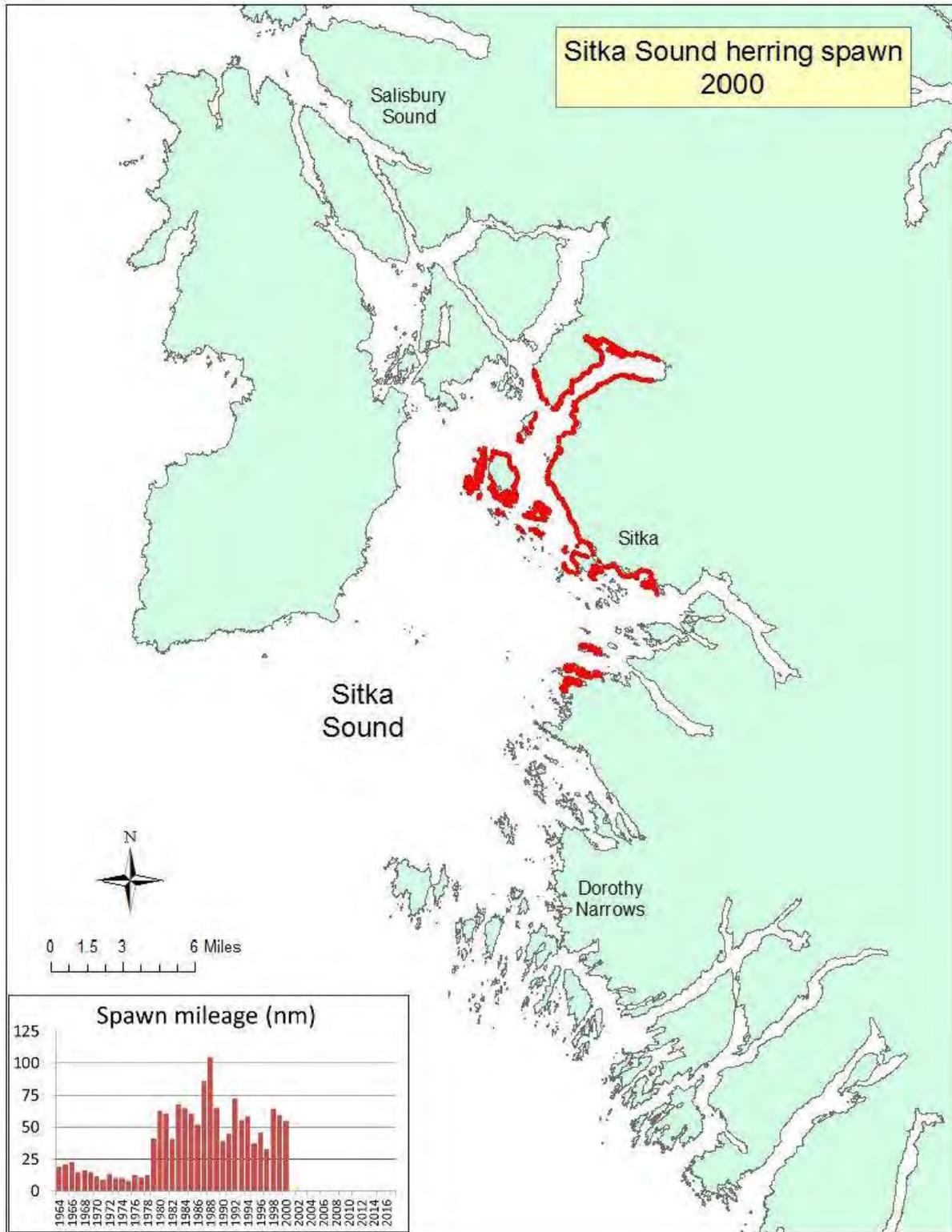


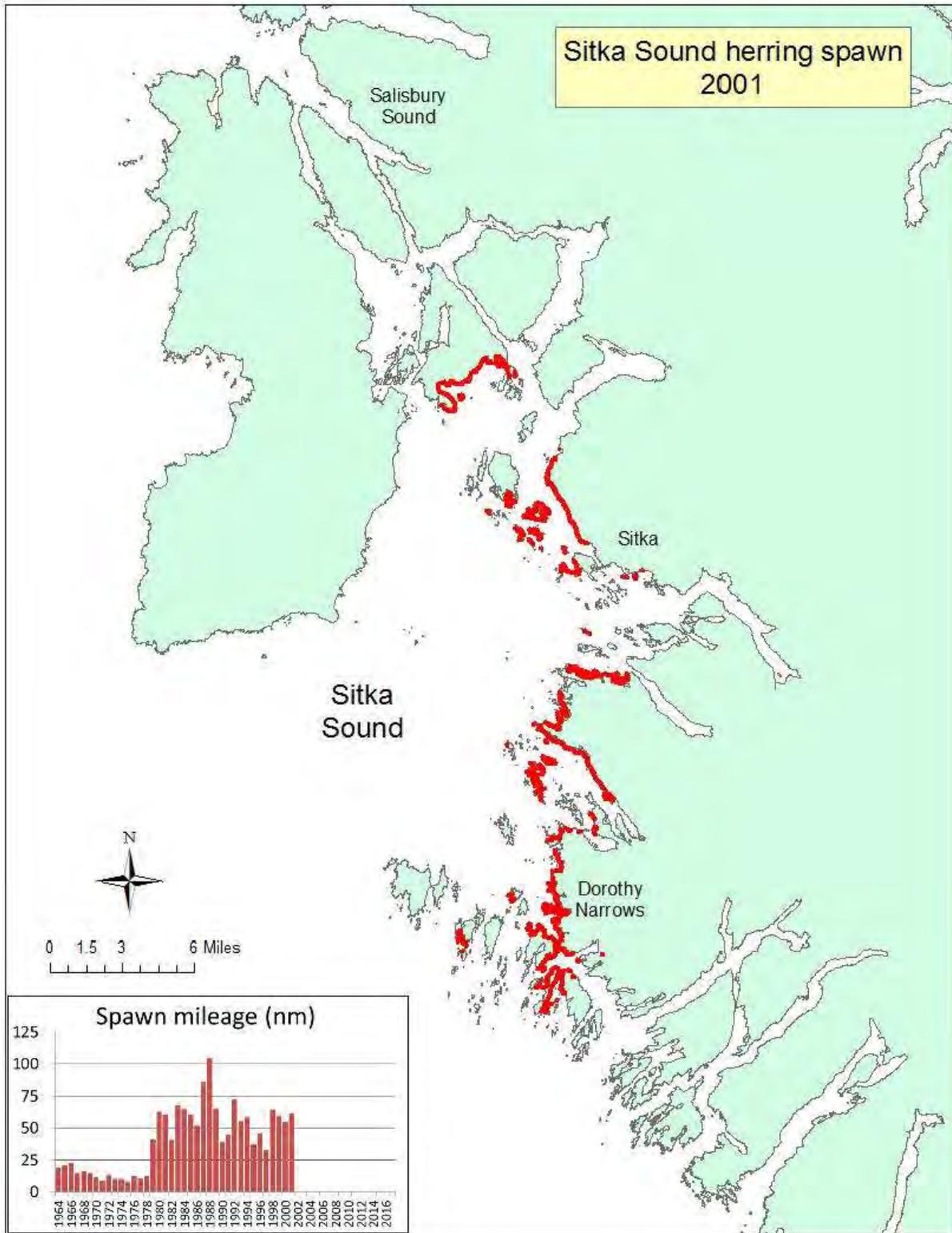


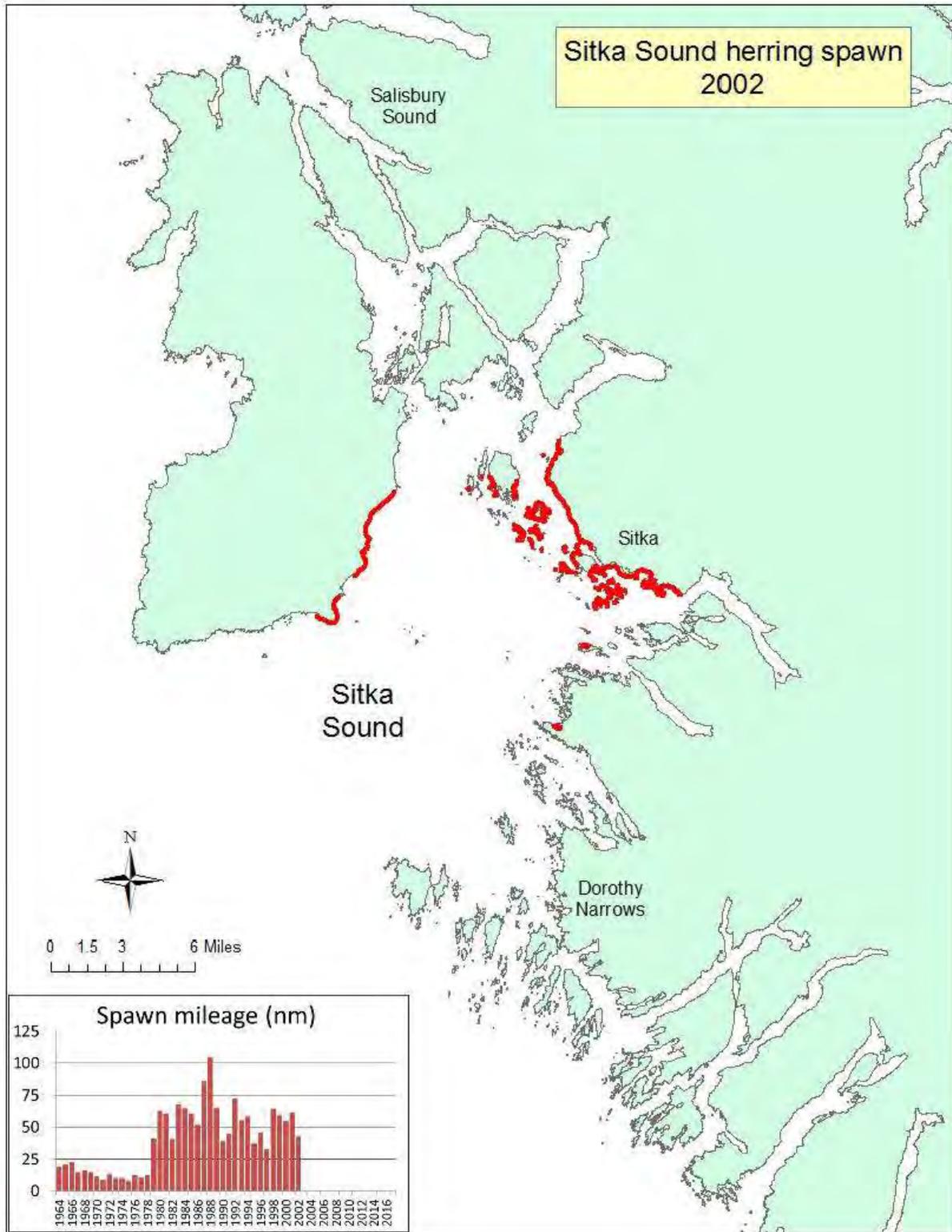


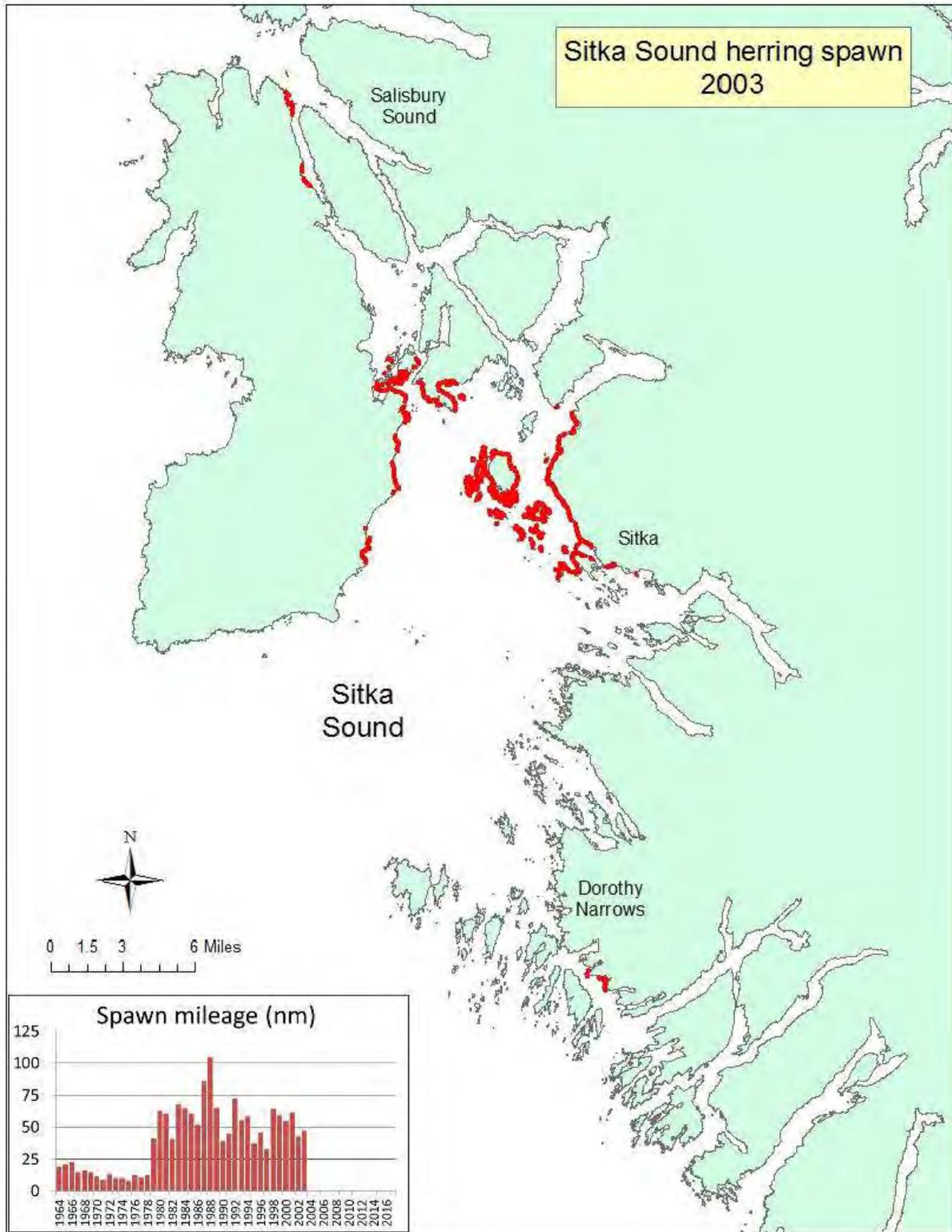


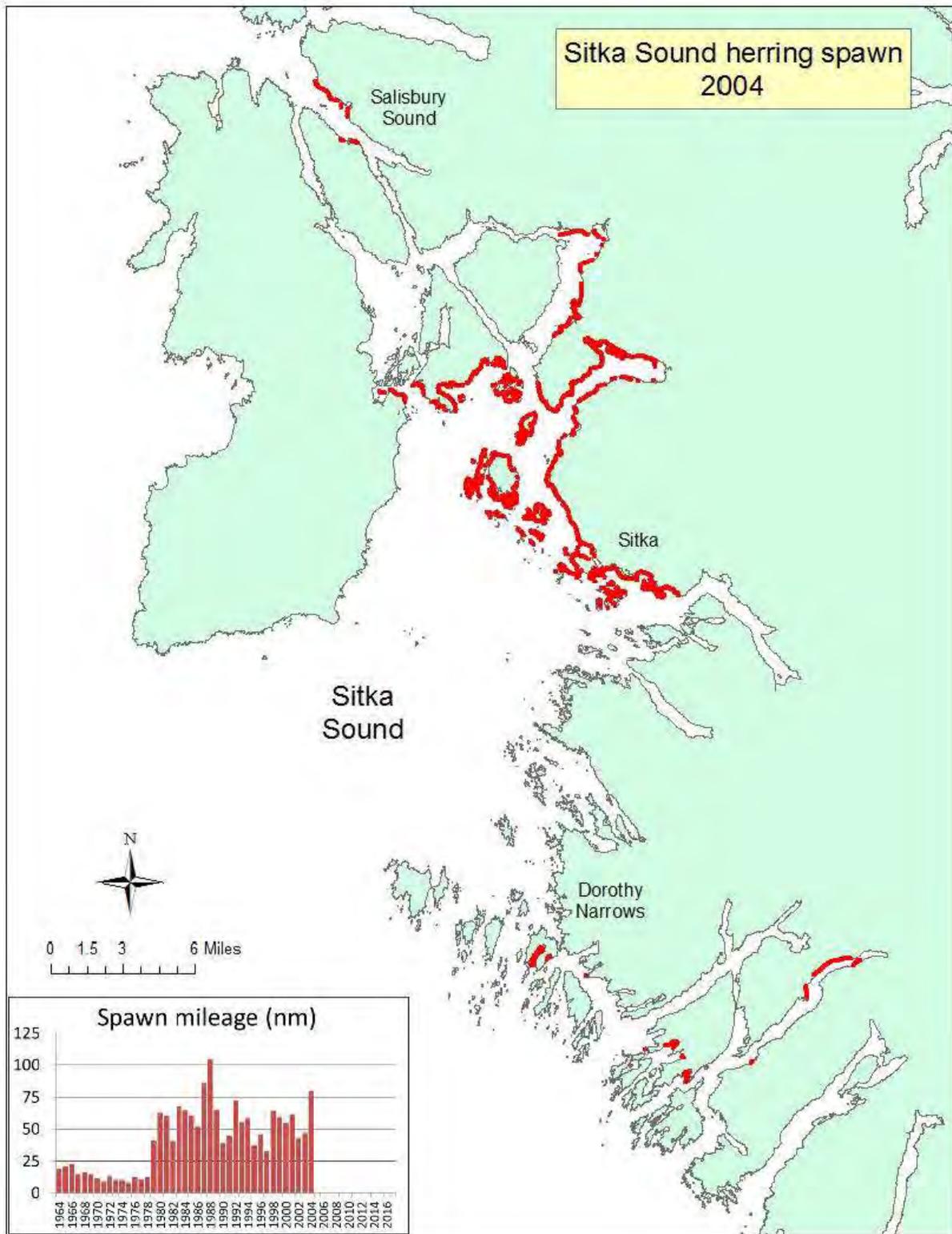


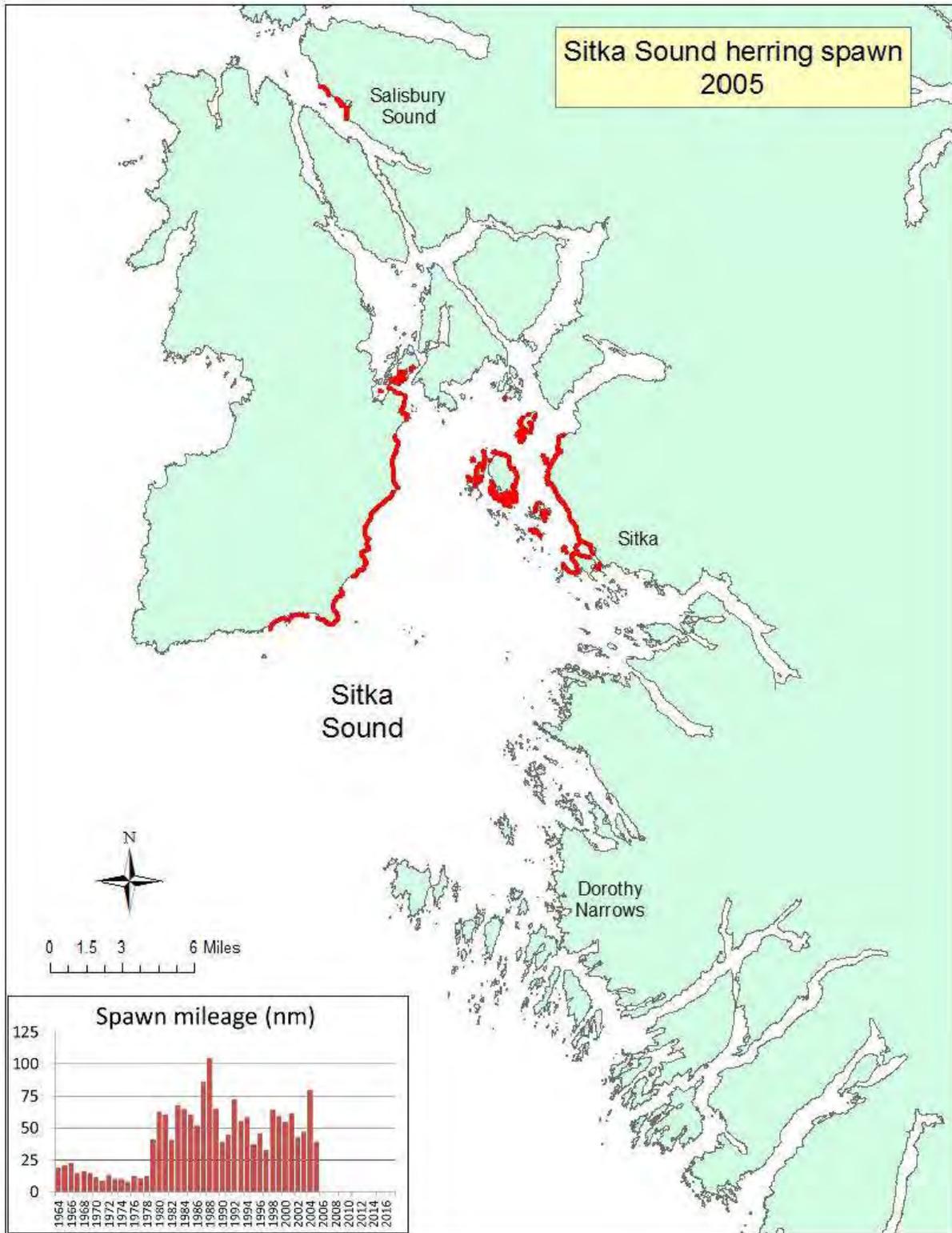


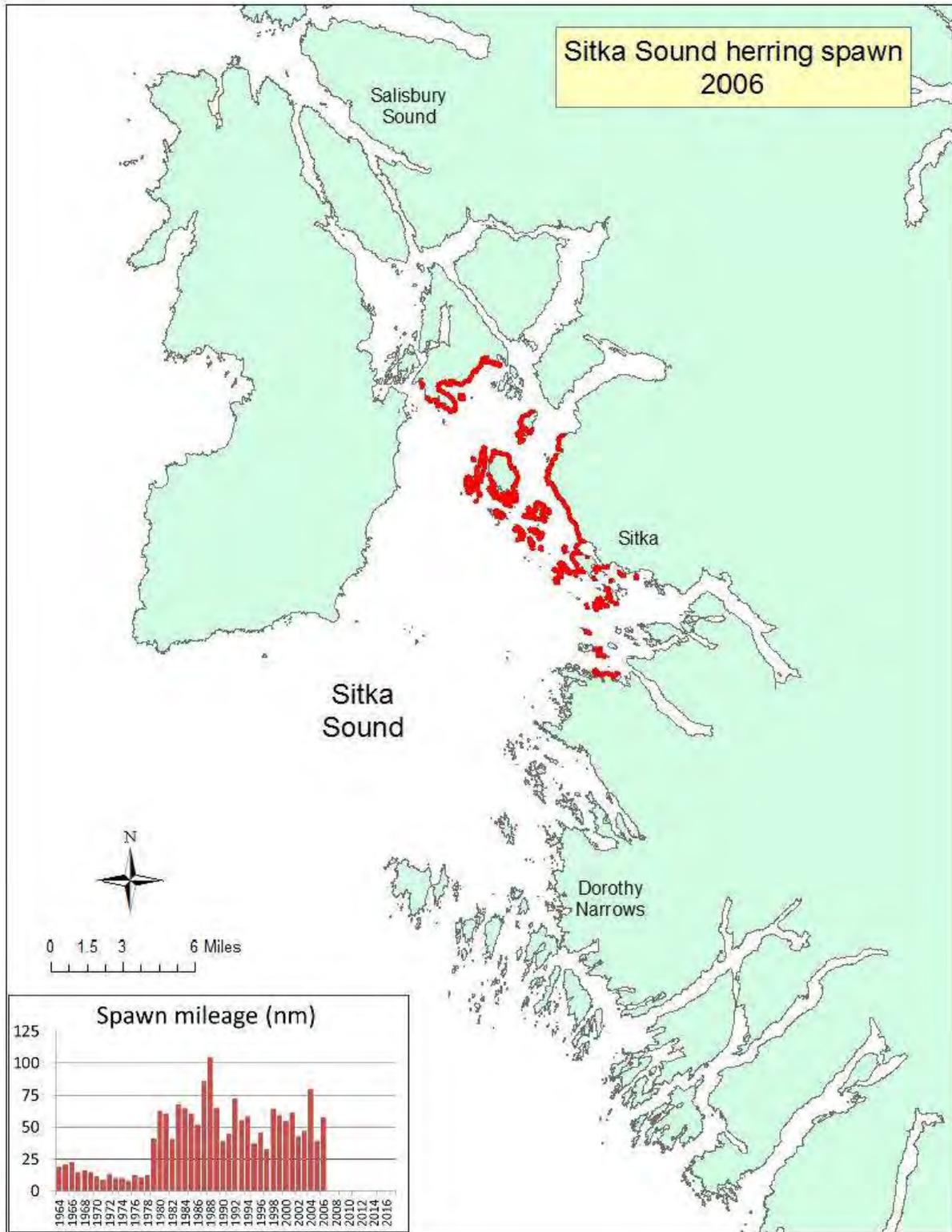


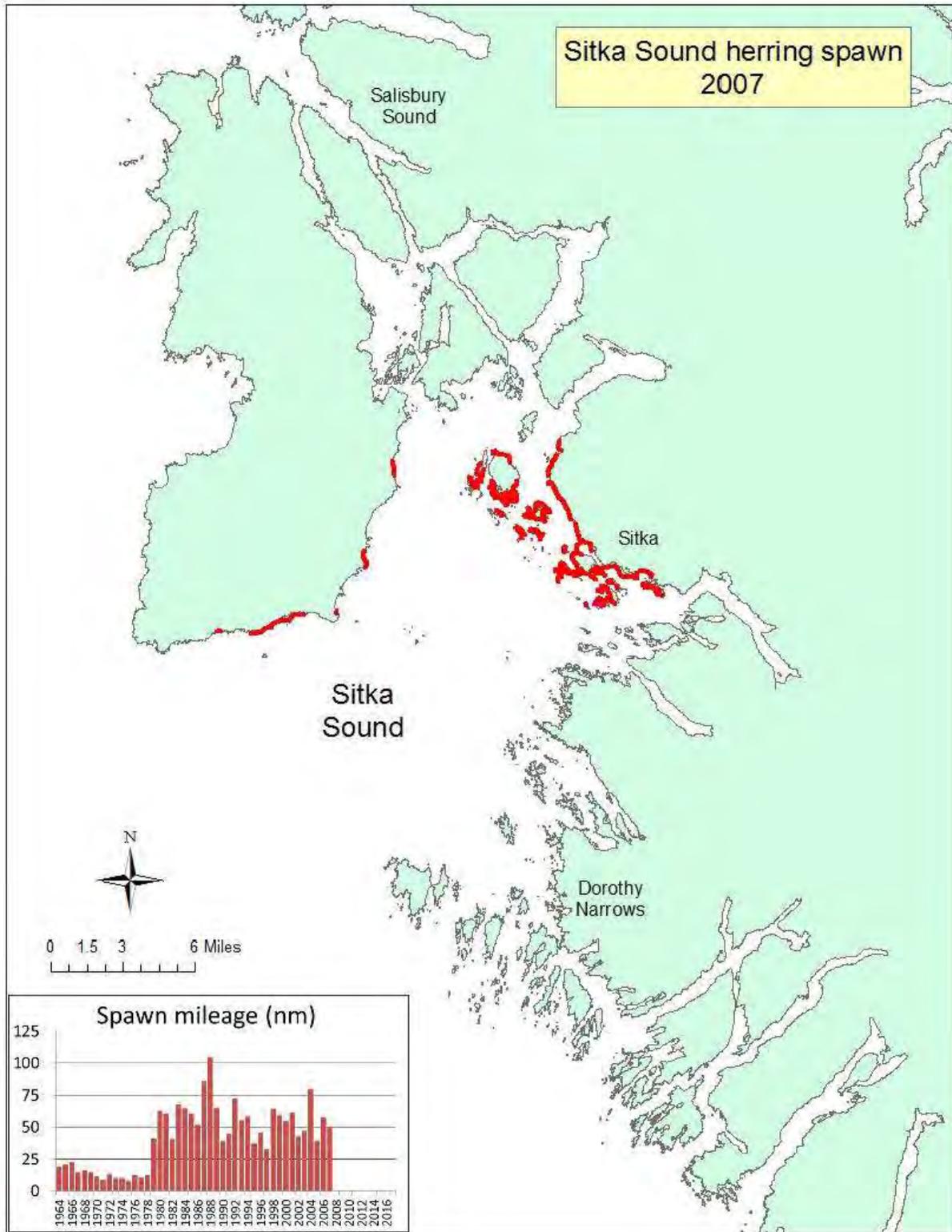


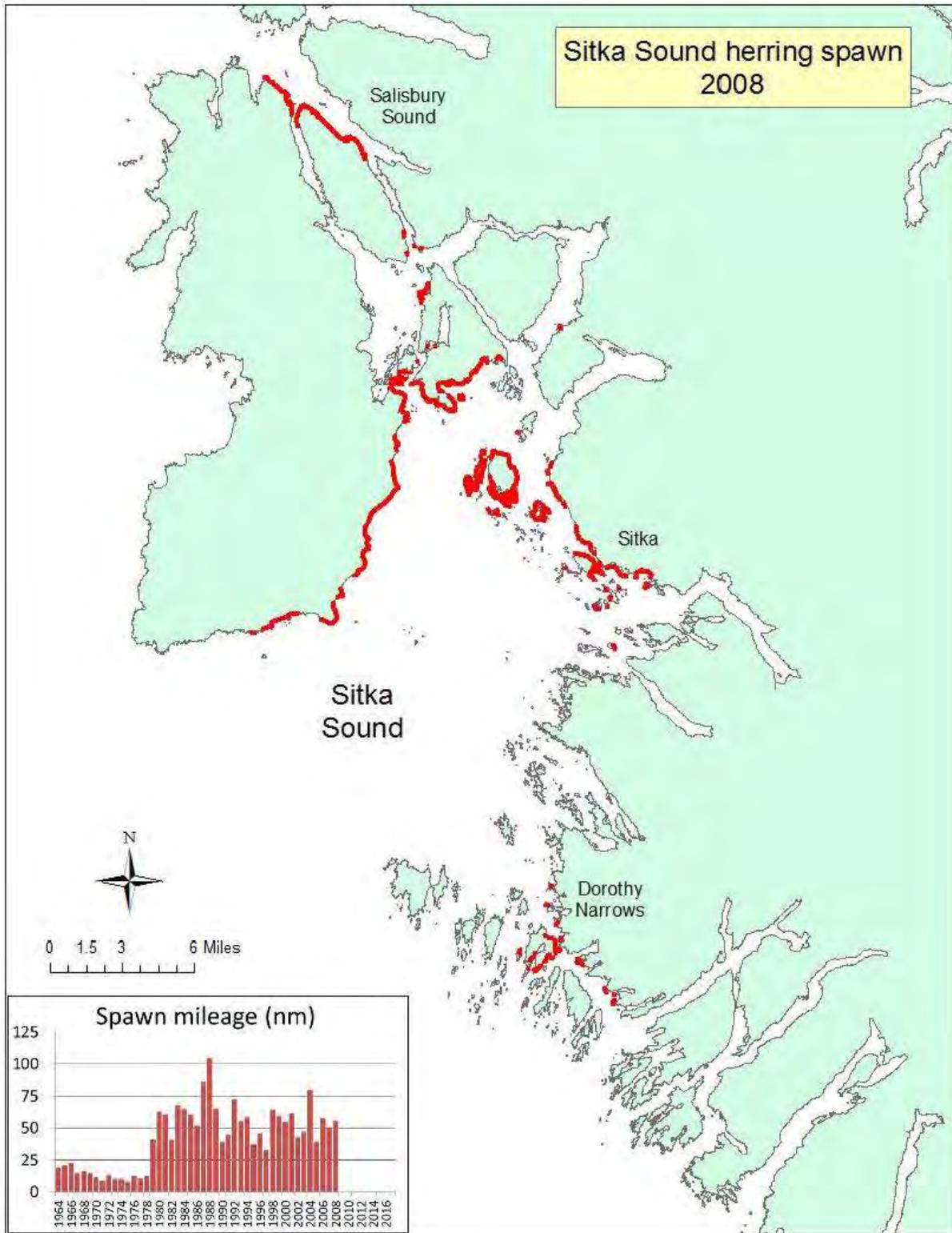


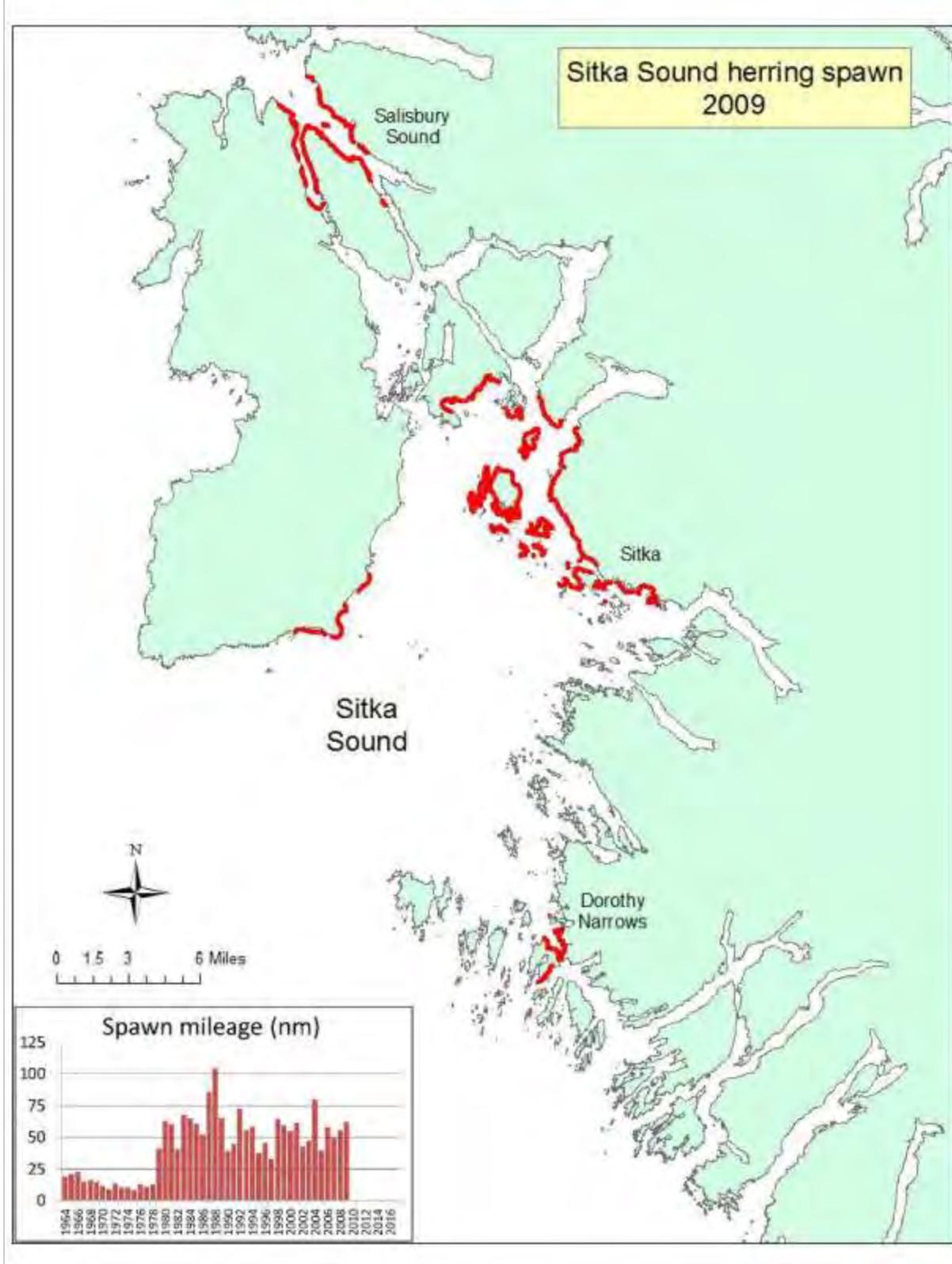


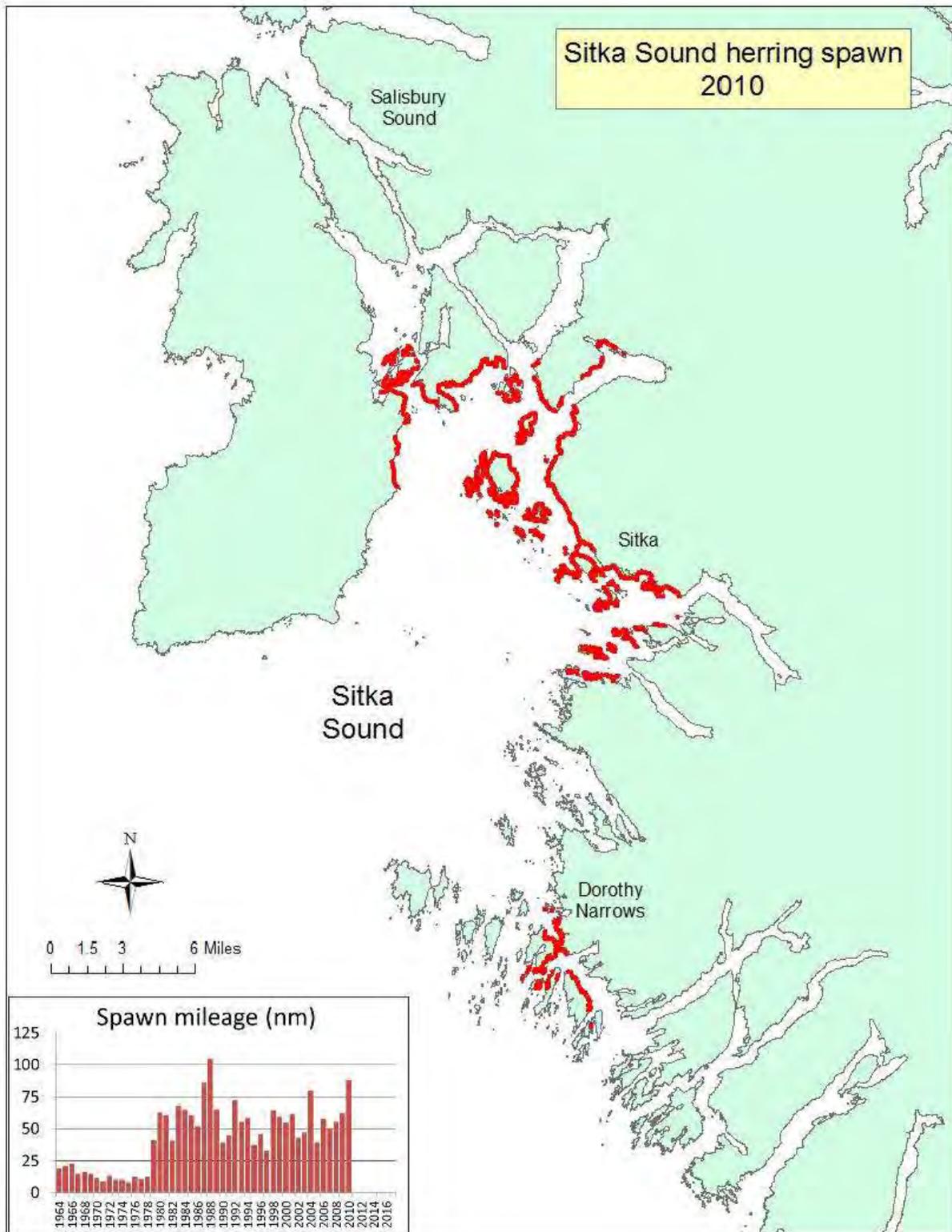


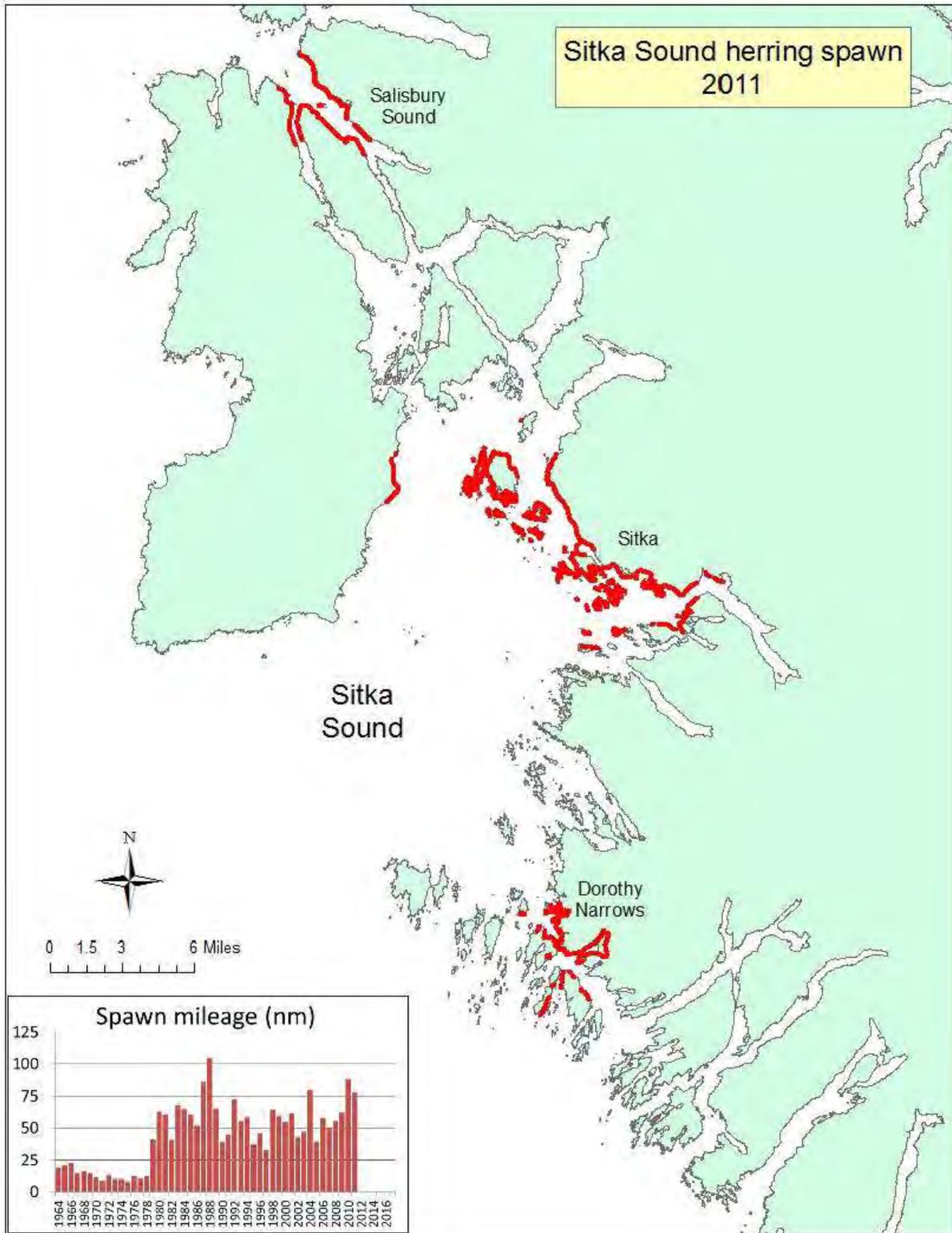


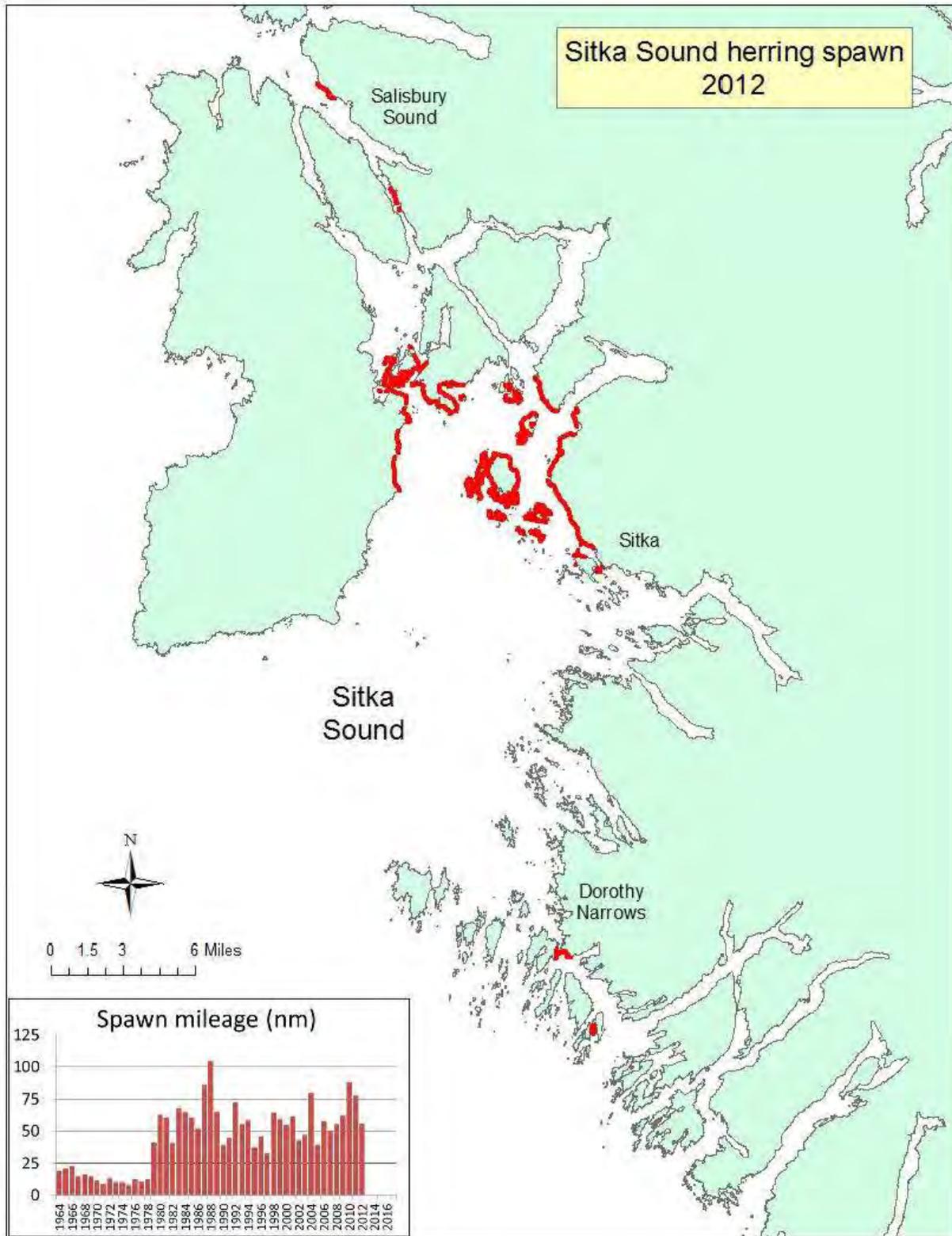


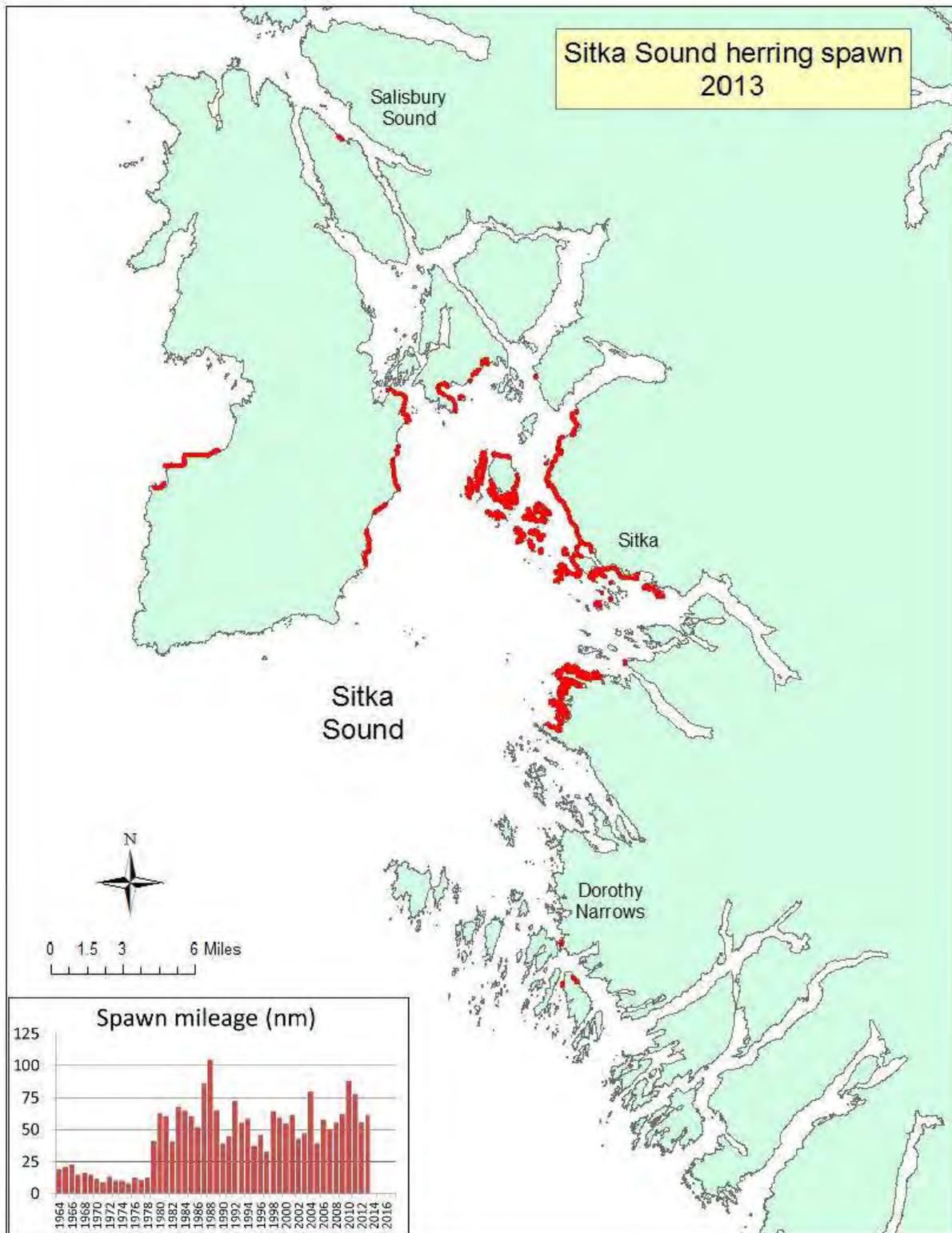


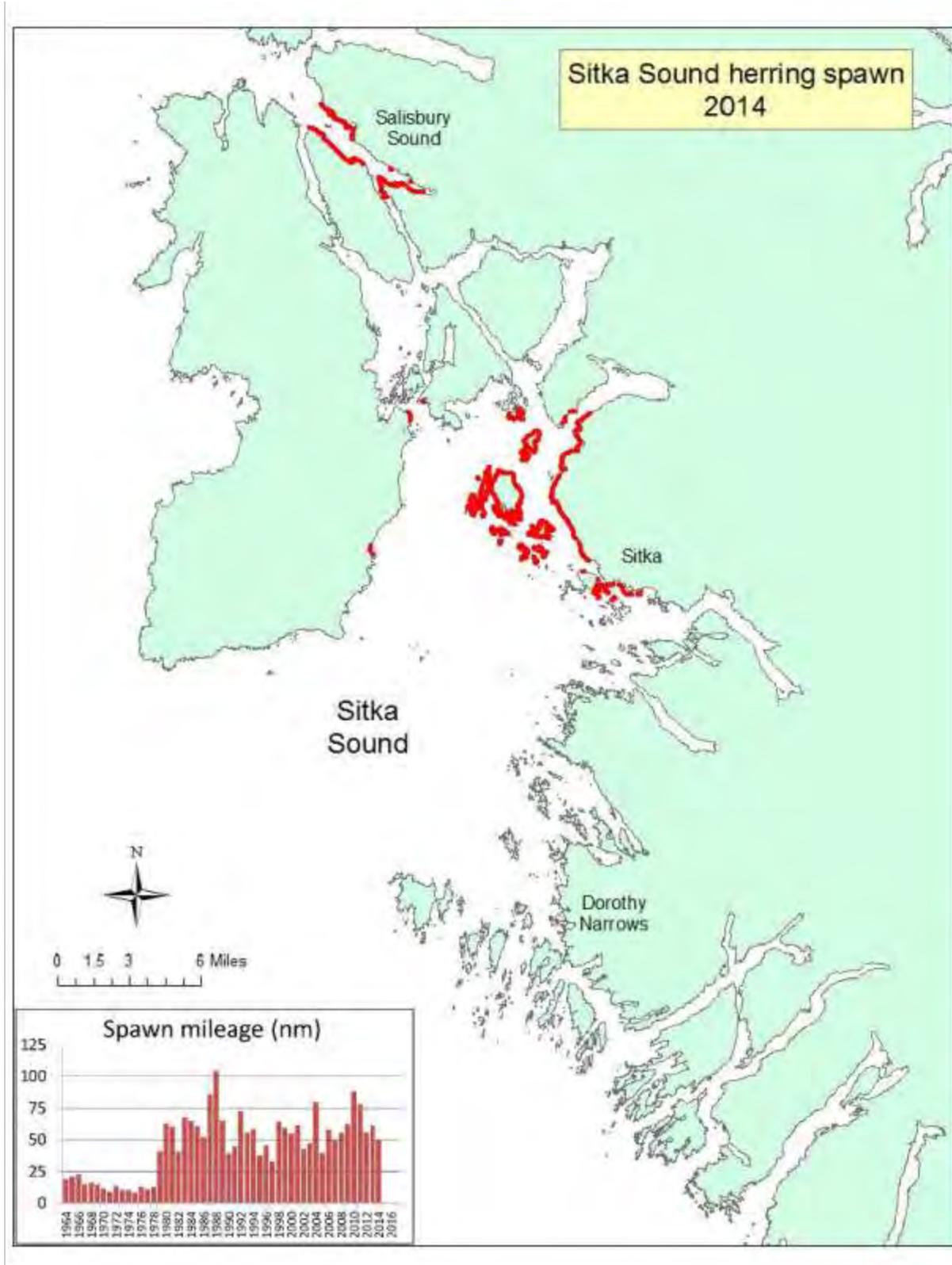


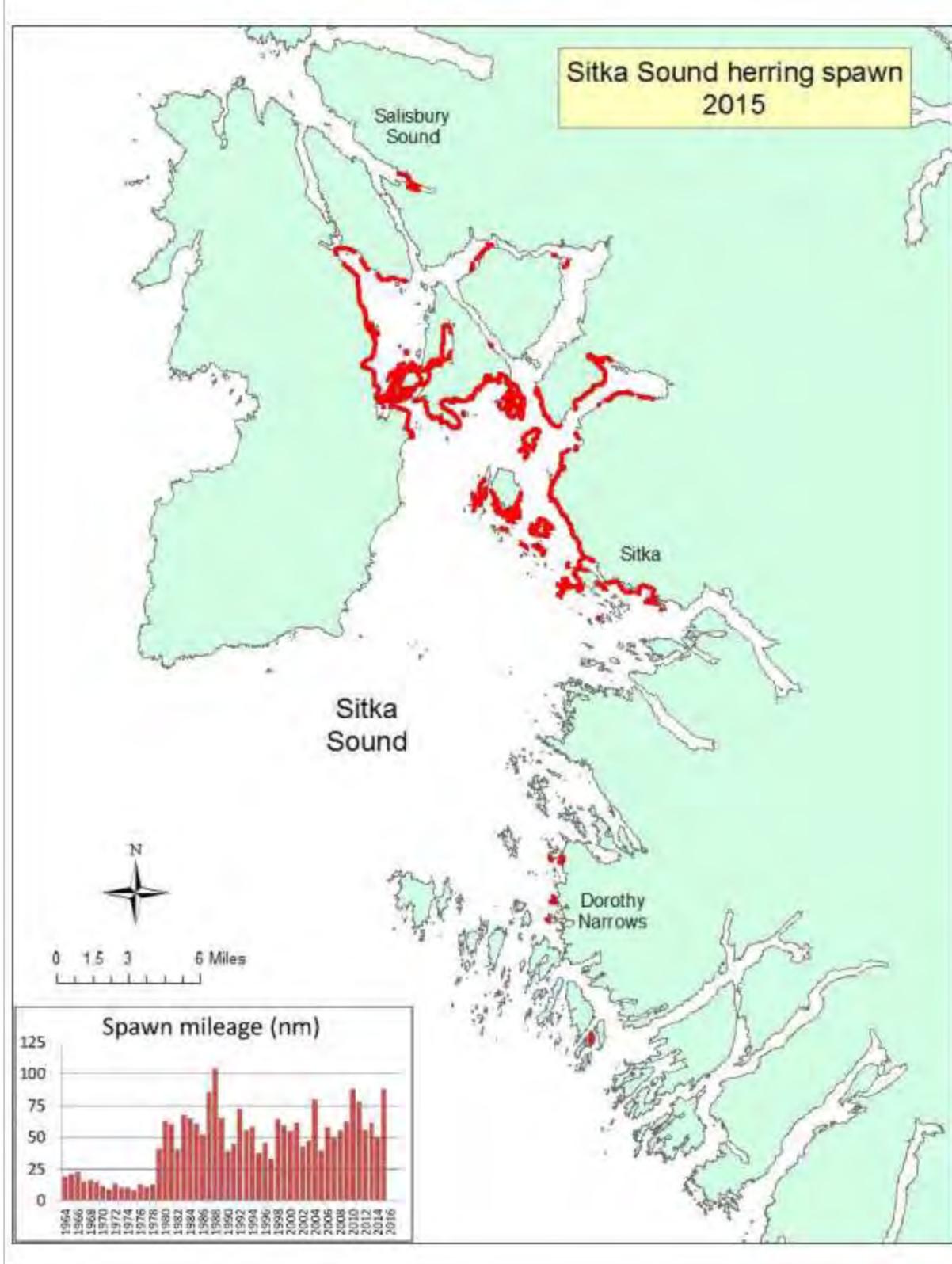


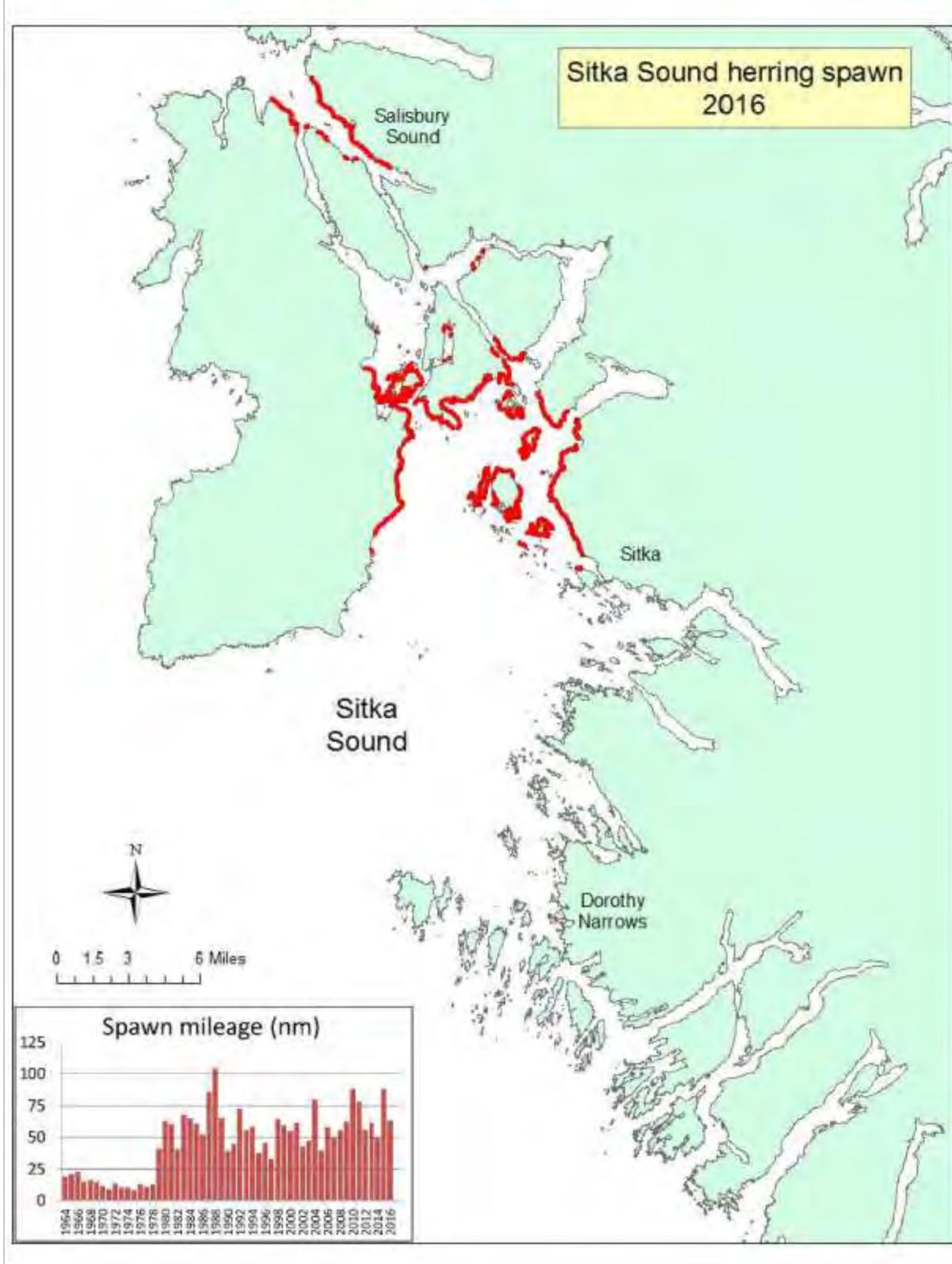


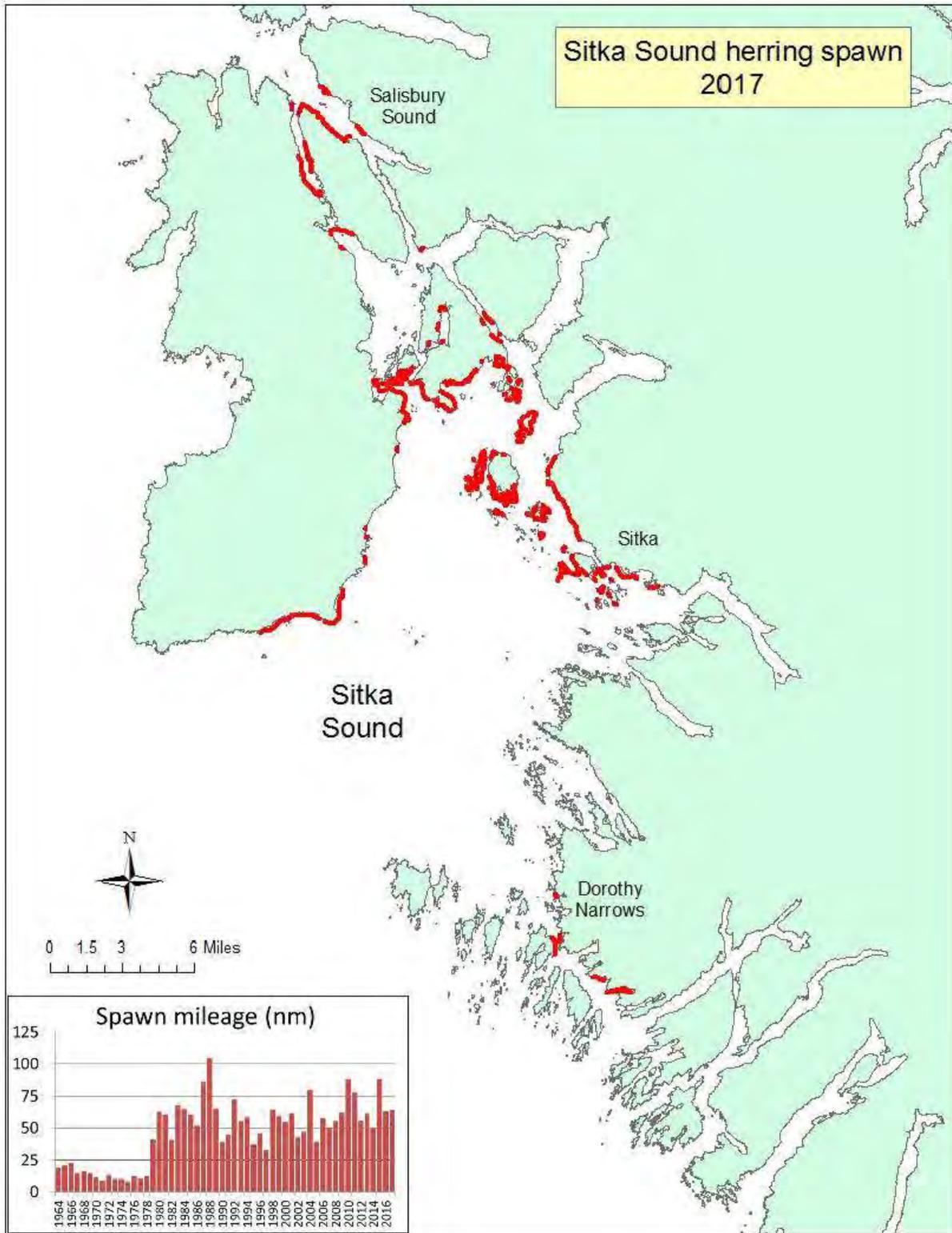












Submitted By
Tom Nelson
Submitted On
10/2/2018 7:54:32 AM
Affiliation

Members of the Board of Fisheries,

I am writing to express my strong OPPOSITION to ACR 10 regarding the Sitka Sac Roe Fishery. The State of Alaska has science based well managed fisheries and Sitka Herring is no exception. This ACR is in no way an emergency and has no place being brought up out of cycle. Spawn deposition surveys indicate a healthy biomass of herring in Sitka Sound. This ACR is purely political and has no hard scientific data to back it up. To the claim of not meeting subsistence needs, one must actually go out and try to harvest eggs. Especially with the increase in large marine mammal predators the herring are adapting their spawning strategy, subsistence users must adapt their harvest efforts as well. The herring have been staying deep and then coming to the surface in one large wave of heavily concentrated spawning. There is no lack of herring in Sitka Sound. Tom Nelson

Submitted By
Wayne Unger
Submitted On
10/1/2018 3:00:53 PM
Affiliation
Silver Bay Seafoods

Phone
907 738-9396
Email
wayne.unger@silverbayseafoods.com
Address
4400 SMC Rd., Suite B
Sitka, Alaska 99835

OPPOSE ACR 10 to close the commercial sac roe herring fishery.

- This proposal re-allocates all herring to one user group.
- The Department and the commercial herring fleet have made significant changes to the fishery in order to address concerns raised by the Tribe.
- We rely on science based and sustainable fisheries management for our business and the future of the fishery.
- Sitka herring is the gold standard for herring management in Alaska and throughout the world.
- Herring data clearly indicates that herring populations have increased significantly since the start of the commercial fishery in the 1970s and especially following the closure of the pulp mill in 1993.
- Natural fluctuations in biomass and spawning behavior do not indicate a collapse in stocks. All species have ups and downs.
- Reasonable opportunity for subsistence harvest exists. 2017 Subsistence Division Report supports this.
- The Department and the commercial herring fleet provide the Sitka Tribe of Alaska with crucial information regarding herring distribution, location and potential and current spawning activity.
- The commercial herring fleet has already lost significant historical fishing area and opportunity in order to address concerns raised by the Tribe.

Permit holder info, 2018:

48 permit holders.

37 Alaska residents

77% of permit holders are Alaska residents.

Timeline of Sitka herring conservation and management actions:

1977- limited entry established.

1978- Acoustical estimate adjusted down due to high numbers of age 2 & 3 herring.

1981- Spawn deposition estimate calculated by miles of spawn and 500 tons per mile conversion.

1982- Dive survey for spawn estimate used for biomass.

1983- Threshold of 7,500 tons and 10%-20% harvest rate in effect.

1993- Sitka pulp mill closed (operated from 1959 to 1993).

1994- First year ASA model used to forecast biomass.

1997- Raised threshold to hold a fishery from 7,500 tons to 20,000 tons to 25,000 tons as herring stock biomass increased (see graph on last page). *Board of Fish*

2002- MOU signed with STA & ADF&G – attempt to cooperate with STA on openings

2002- Discussion with STA about Equal Split fishery, from STA's point of view Equal Split was desirable

2002- New management plan for harvest dispersal.

2008 – present- supplemental harvest of herring eggs *by industry* Average 40,000 lbs with range from 35k to 75k.



2009- MOU cancelled due to lack of cooperation.

2012- Closure of "Core Area" (22 sq. mi.). *Board of Fish action*

2015- Closure of Makhnati Island area. *Federal Subsistence Board action*

2015- Fishery closed without harvesting the full commercial quota to assist in meeting subsistence needs. *Department action, at request of industry*

2018- Additional area closed in "Core Area" *Board of Fish action*

Co-op fishery years (all or part of GHL taken as co-op): 1979, 1988, 1991, 1996, 1999, 2002, 2015, 2018



Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

VIA Email: dfg.bof.comments@alaska.gov

October 3, 2018

Board of Fisheries
ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

RE: Comments in Support of Agenda Change Request 10

Dear Board of Fisheries:

Sitka Tribe of Alaska (“STA”) supports approval of Agenda Change Request (“ACR”) 10, adding the Sitka Sound herring fishery to the Board’s agenda. The ACR should be granted and heard as soon as possible.

STA is a federally recognized tribal government located in Sitka. STA is responsible for promoting the health, welfare, safety, and culture of over 4,000 tribal citizens. STA’s tribal citizens depend on herring roe for subsistence, and herring are central to the nutritional and cultural wellness of STA citizens and the ecosystem. The harvest of herring roe on branch and other substrates is a cultural tradition dating back to time immemorial. Preparing for, conducting, and sharing the harvest involves cooperation, transmittal of important indigenous knowledge and values, and serves as a mechanism to promote individual wellness and a healthy community. Herring roe is a celebrated food with a core role in ensuring the food security of tribal members, including being shared as gifts and eaten at potlatches and other important gatherings.

The Board must address the fact that under current regulations, STA’s tribal citizens are currently denied a reasonable opportunity for subsistence herring roe harvest. The amount necessary for subsistence as set by the Board has been met in only 4 of the past 14 years, and subsistence harvests are consistently inadequate in terms of both quantity and quality. The most recent harvest reports continue to demonstrate an exigent need to address the regulatory failure to ensure adequate subsistence harvests. The ACR is a



necessary first step for the Board to fulfill its duty to properly manage the Sitka Sound herring fishery in accordance with all statutory and constitutional obligations.

I. The ACR is necessary to provide a reasonable opportunity for subsistence harvest.

The most recent subsistence harvest reports demonstrate new and compelling evidence that the current regulations do not provide a reasonable opportunity for subsistence herring roe harvest. The Board's "Policy for Changing Board of Fisheries Agenda" does not specifically address agenda change requests related to the failure to protect subsistence opportunities; however, the Board cannot postpone immediate concerns that threaten irreparable harm to subsistence harvesters. Here, the urgency and continued failure of the Board's policies to ensure a reasonable opportunity for subsistence herring roe harvest demonstrate a "compelling" circumstance that warrants the Board's immediate attention.

The Board's and Alaska Department of Fish and Game's ("ADFG") history of managing Sitka Sound herring has been focused on providing an economically viable commercial fishery, resulting in repeated failures to ensure the subsistence priority. Subsistence herring roe harvests peaked in 2004 but have consistently declined over time. In 2009, the Board set the amount necessary for subsistence ("ANS") at 136,000 to 227,000 pounds, a threshold that has been met only four times since 2005.

In 2012, the Board established a "Core Conservation Area" for Sitka herring that included part of the area traditionally used for the subsistence harvest. Despite this action, in 2016, ADFG reported a subsistence harvest of only 84,554 pounds, well below the ANS. In 2018, the Board closed an additional 4 square miles to commercial harvest. Yet the subsistence harvest was dismal in 2018. The consistent failure to harvest the ANS demonstrates that focusing on geographic limits and closed areas simply does not work, and does not provide a reasonable opportunity for subsistence. The Board and ADFG must take a new management direction to ensure the Sitka Sound herring population is managed for sustained yield consistent with the subsistence priority.

The ACR must be approved in order for the Board to begin solving this complex and urgent problem. The Board's constitutional and statutory obligations to provide a subsistence priority cannot be sidelined or delayed. The most recent subsistence harvest data show a compelling and urgent need to change management directions to ensure sustained yield and subsistence priority.



II. The ACR is necessary to ensure conservation of the Sitka Sound herring population.

In addition to failing to provide a subsistence priority, the Board's current Sitka Sound herring regulations fail to conserve the population and manage herring according to constitutional and statutory mandates and the best available science. Since 1983, Sitka Sound herring population has been managed using a threshold and variable harvest rate. Thresholds and harvest rates set for forage fish, like herring, were intended to "protect the stocks from sharp reductions due to recruitment failure, to maintain adequate abundance of herring as prey for commercially important predator species such as salmon, and to provide for the quality commercial herring products." (Carlile 1998). First, it is notable that the thresholds and harvest rate are focused on commercial opportunities, not subsistence harvest needs. Second, best available science suggests the Board's maximum harvest rate of 20 percent is insufficient to conserve the herring population (Martel et al. 2012). Sitka Sound herring "are being managed in a significantly depleted state." (Thornton 2010). Sitka Sound herring regulations invite a more aggressive commercial fishery in time and quantity than in any other Alaska herring fishery. The Board must re-evaluate its regulations to incorporate new scientific evidence for determining thresholds, including more precautionary thresholds based on minimum spawning biomass instead of minimum total biomass, and to provide for priority subsistence uses.

During the last decade, the Sitka Sound population has been reduced by approximately 50 percent. Preliminary data from ADFG for 2018 show that "very little spawning was observed in the islands near Sitka, which typically receive substantial spawn."¹ The linear miles of herring spawn in Sitka Sound during 2018 season was the lowest on record since 1979. While final ADFG data from the 2018 stock assessments will not be available until November, it is clear that the ANS was not met. ADFG closed the commercial fishery for the season early on April 3, 2018 after consulting with industry representatives, with a harvest of only 2,926 of the available 11,123 ton limit. ADFG works closely with the commercial fishery regarding management actions, but does not meaningfully consult with STA on in-season management issues and decisions. Moreover, regulatory and management decisions fail to give weight to the traditional knowledge and management practices of Alaska Natives despite their thousands of years of experience and observation. By ignoring traditional ecological knowledge of herring abundance, distribution, and spawn timing and only considering data from the

¹ ADF&G Fishery Update, Sitka Sound Sac Roe Herring Fishery Announcement, April 27, 2018.



last 40 years, the State of Alaska is ensuring Sitka Sound herring will be managed under a shifted baseline and will not recover to their former abundance.

STA also has significant concerns about the size and age selectivity by the commercial fishery. These are important conservation issues that must be addressed by the Board before the 2019 season opens. Considering the size and age in concert with learned migration is essential before a commercial harvest of Sitka Sound herring can occur. The critical ecosystem-wide role herring serve as a forage fish must also be accounted for to prevent a catastrophic domino effect on other commercially and socially important species like Chinook and coho salmon and Pacific cod. Large-scale environmental impacts and climate change are impacting the Sitka Sound herring stock, and there is little understanding of how, and what steps should be taken to mitigate negative impacts. This uncertainty demands a more precautionary management approach than is currently practiced under Board regulations and ADFG management actions. Merely establishing closed areas for subsistence fishing without significant efforts to conserve and rebuild the Sitka Sound herring stock is meaningless if steps are not taken now to address the declining population.

For the foregoing reasons, the Board should grant the ACR and begin an immediate process to amend the current Sitka Sound herring regulations, ensuring a reasonable opportunity for subsistence and conservation of the population. Changes to the current regulations are needed before the next herring roe season begins in March 2019. Given that timeline, and the need for the users of the Sitka Sound herring resource to adjust to revised regulations and management, STA requests the Board schedule consideration of this issue within 60 days or as soon as possible to meet statutory notice and comment requirements. The meeting should be held in Sitka. A hearing on the ACR should be scheduled before the Board's January 2019 meeting in Anchorage. The scope of the Board's approval and public notice of the issues that will be considered pursuant to the ACR should be broad, covering a review of all relevant regulations and management practices, and include all the issues raised in the ACR and STA comments. Significant reform is required in the regulations and management practices. The Board's actions on the ACR should provide the opportunity for such reform.

Sincerely,

KathyHope Erickson
Chairman

From: Abraham Horschel
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Monday, September 24, 2018 10:59:25 AM

Abraham Horschel
869 cootonwood drive
Valdez, AK 99686

September 24, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Please stop the excessive dumping of hatchery fish into Alaska waters. It is ruining the wild runs. The sockeye salmon hatchery nets at the gulkana have blocked and wiped out the steelhead at Gunn creek and natural Fish lake sockeye. The bycatch is wiping out the robe river sockeye and has already destroyed the kings returning to the Lowe river slough. These hatchery did are overtaking the feed for natural salmon and are destroying the herring and other prey stock. It is easy to sell the story that it was the Exxon spill, but that isnt the case any more. It is the pollution of Alaska waters with Hatchery fish.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Abraham Horschel

From: Alex Gimarc
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Sunday, September 23, 2018 7:17:12 AM

Alex Gimarc
11155 Bluff Creek Circle
Anchorage, AK 99515

September 23, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound are out-competing longer lived salmon in the salt water. Dumping nearly a billion pink smolt into Prince William Sound (PWS) has severely impacted coho, red and king returns in PWS. Coho fishing has been terrible for nearly the last decade. King fishing has been likewise poor. And this year, red returns into the Copper River have been disastrous.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. The problem with the yearly dumping of nearly a billion pink smolt is that it never allows the biomass in the North Pacific to regenerate like it normally would every other year. And that lack of regeneration is showing up in poor returns of other salmon species and smaller overall fish sizes.

My ultimate solution would be to move the pink commercial hatchery output and fishery to a fish farming operation - onshore or offshore. This way the hatchery release of pink smolt would no longer harm other salmon returns from Cook Inlet to Southeast AK. While the ban against fish farming in Alaska still exists, the BoF can take the lead to repeal it. And the PWS pink commercial fishery would be a great place to start.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Cheers
Alex Gimarc

From: Amber McDonough
To: [DFG_BOF_Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Wednesday, September 26, 2018 1:04:35 PM

Amber McDonough
200 W 34th Ave #371
Anchorage, AK 99503

September 26, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

I have fished the Kenai River between the mouth at Cook Inlet and Cooper Landing for nearly 20 years. In that time I have seen the Chinook salmon numbers drop dramatically and the average size of the sockeye salmon shrink. Each salmon, whether hatchery or wild, that returns to the ocean to feed is a voracious predator. The ocean while vast, does not have an unlimited capacity to provide feedstock for these salmon. It doesn't make sense to sacrifice the quantity and quality of the high value species (chinook, sockeye, coho) for massive numbers of pinks/chum (which many Alaskans consider "junk" fish). Continuing this practice only benefits large commercial processors that export our pink salmon resources for their profit and does not encourage a healthy natural diversity among the competing salmon species. The amount of hatchery produced pink salmon released into Alaska's waters must be reeled in.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Amber McDonough

From: Ben Allen
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Wednesday, October 3, 2018 4:53:31 PM

Ben Allen
4150 East Wickersham Way
Wasilla, AK 99654

October 3, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

I'm Ben Allen, long time Alaskan resident, 12 years experience salmon fishing guide, bed and breakfast owner, and fish processing owner. I live in Wasilla, Alaska- strictly because of my ties to salmon fishing. Poor King salmon runs are crushing my businesses. King salmon returns to the Matsu Valley were too bad to support even catch and release fishing last year. We have seen closures and restrictions for the last 11 years for King salmon fishing in the Matsu Valley, due to weak returns. Things have gotten so bad with our King fishery, that I will not book out of state customers, due to the high probability of closures. There is no predictable wild King salmon fishery in the Matsu Valley! The compounding effects of increasing ocean temperatures and competition for increased demand food supply is having serious negative effects on our King salmon.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,

Ben Allen

From: Bill Eckhardt
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Tuesday, September 25, 2018 6:45:29 PM

Bill Eckhardt
PO Box 249
Sterling, AK 99672

September 25, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record pink salmon abundance due to the hatcheries. Until there is much more understanding of the marine food chain for all salmon species, the BOF must use some common sense and halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Bill Eckhardt

From: Brita Mjos
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Thursday, September 27, 2018 9:24:54 AM

Brita Mjos
2018 Alder Drive
Anchorage, AK 99508

September 27, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

The oceans resources are finite, and it is hard to justify how millions of additional fish released into the ocean would not compete for resources with wild stocks. Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Brita Mjos

From: Chris Trueblood
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Friday, September 21, 2018 8:42:11 PM

Chris Trueblood
PO Box 13134
Palm Desert, CA 92255

September 22, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I was born and raised in Alaska and my family has been established in the state since the 1940's. Unfortunately I had to move out of state for my career; however I spend my summers still making sure to come home to fish. I plan on moving back to the Kenai Peninsula to retire in the future and was actively looking for property until this season.

I have seen the steady decline of the quality of sport fishing in my lifetime and also in the last 5 years a very odd influx of very large pink salmon in quantity and size in all watersheds I fish that are road accessible from the anchorage area. 20 years ago a 10 pound pink was unheard of, these days when fishing silver season I routinely throw back 10 pound pinks. I had a pink mounted last season from the Kenai that would easily have beaten world record and that record was broken over and over again in 2016.

The pinks are voracious feeders and instead of being alternate year fish they seem to come back now every year in bigger numbers and size each year while seeing the size and quantity of competing pacific salmon species steadily decline. The correlation cannot be just a coincidence.

Us Alaskans have always known pinks as nothing but a trash fish only fit for dog teams and commercial interests overseas. The tourism dollar that is so important to sustain the peninsula dollar requires that salmon stocks of important species such as Chinook, Coho and Sockeye be maintained or the livelihood of thousands of Alaskans will be irreparably destroyed.



Every time I visit alaska now for a fishing trip as an out of state fisherman I spend thousands of dollars each trip on food at local businesses, gear, licenses, gas and miscellaneous items.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Chris Trueblood

From: David Rand
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Wednesday, September 26, 2018 7:43:56 AM

David Rand
P O Box 954
Trenton, GA 30752

September 26, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

As a frequent sports fisherman and visitor to the waters of Alaska

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
David Rand

From: Don Johnson
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Friday, September 28, 2018 9:07:08 PM

Don Johnson
36160 Schultz street
soldotna, AK 99669

September 29, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Alaska salmon hatcheries are killing our wild salmon. You cannot continue to dump billions of artificial salmon in the north pacific and expect our wild salmon to survive. We are seeing massive wild salmon losses because hatcheries are consuming are the ocean prey available.. Close down the hatcheries now!!!

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,. Don Johnson
Don Johnson

From: Jeff Bohren
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Tuesday, October 2, 2018 6:18:26 AM

Jeff Bohren
PO BOX 996
Kenai, AK 99611

October 2, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound. How much harm to the commercial fisheries will happen by waiting for the study results?

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Jeff Bohren

From: Jeff Reeves
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Saturday, September 22, 2018 3:10:36 PM

Jeff Reeves
P.O. Box 380
Craig, AK 99932

September 22, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

And this isn't production from Prince William Sound alone. Add in the additional, ever increasing in number, Pinks and Chums produced in Southeast Alaska that are also winding up in the Gulf of Alaska. It is not unknown by ADFG that wild Chum in SE have been in decline. I have also noticed that many Coho, in late August, caught offshore in Southern Southeast are full of juvenile salmon. The lack of spots on these smolts seems to indicate Chum.

Any of us that had fisheries biology class know that an environment can only support so much. So, please decision makers and managers, letstart practicing what we all have learned.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,

Jeff Reeves

From: Joe Mongeau
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Saturday, September 22, 2018 10:10:54 PM

Joe Mongeau
670091
Chugiak, AK 99567

September 23, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely, I also believe that the fish are smaller. Not enough food to support the numbers..
Joe Mongeau

From: ken federico
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Saturday, September 22, 2018 12:40:30 PM

ken federico
PO Box 873641
wasilla, AK 99687

September 22, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

*****Releasing these extra 20 million pink salmon smolt to benefit just a small number of commercial fishermen at the possible jeopardy and expense of other types of Salmon is just ludicrous. UCIDA tells their members to tell the BOF that this is being done under sound management and scientific past knowledge. This is just blatantly false. NO ONE know the outcome of these extra mouths to feed. I, for one, am not willing to take this chance on harming other salmon runs just so a few people can make an extra car payment.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
ken federico

From: Margaret Nelson
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Tuesday, September 25, 2018 3:25:10 PM

Margaret Nelson
10121 Middlerock Road
Anchorage, AK 99507

September 25, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Please ensure that hatchery fish do not invade wild stocks and protect our Knowledge Salmon. Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Margaret Nelson

From: Mark Jorgensen
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Thursday, September 27, 2018 10:15:07 AM

Mark Jorgensen
PO Box 13
Puposky, MN 56667

September 27, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

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Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

We sure would like to be able to keep coming up to Alaska to sport fish and spend our tourist dollars.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Sincerely,
Mark Jorgensen

From: Ray DeBardelaben
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Support for KRSA ACR #1 to Halt Expansion of Hatchery Pink Salmon Production in Prince William Sound
Date: Wednesday, October 3, 2018 1:32:56 PM

Ray DeBardelaben
Box 4357
Soldotna, AK 99669

October 3, 2018

Dear Board of Fisheries Comments,

Dear Alaska Board of Fisheries,

I support the Agenda Change Request submitted by the Kenai River Sportfishing Association to halt further expansion of the hatchery pink salmon production in Prince William Sound. Specifically, KRSA's ACR #1 seeks prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from 20 million additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017.

Hatchery pink salmon from Prince William Sound show very high rates of straying inter-regional straying into Lower Cook Inlet, when compared to intra-regional straying of LCI hatchery pink salmon.

Scientific research and agency reports document adverse impacts on wild salmon from increased food competition in the North Pacific Ocean, where there are record high salmon abundance and commercial harvests, even with an increasingly variable ocean environment. Commercial salmon harvests in Alaska in 2013, 2015 and 2017 were the three highest on record.

Two-thirds of salmon in the North Pacific Ocean are pink salmon, who have an even-odd year cycle. That two year cycle appears to be impacting food availability for other species of wild salmon. In 2018, there were historic restrictions and closures of sockeye and Chinook salmon fisheries across the Gulf of Alaska.

Until there is much more understanding of the marine food chain for all salmon species in the North Pacific Ocean, the BOF must act to halt further expansion of industrial hatchery pink salmon production in Prince William Sound.

I urge the Alaska Board of Fisheries to exercise its full regulatory authority to amend terms of permits relating to the source and number of salmon eggs for private, non-profit hatcheries in Alaska, by accepting KRSA's ACR #1.

Thank you for your time and attention to this most pressing fishery conservation issue.

Sincerely,

Kenai river professional guide association is in full support of Krsa . We really need to take a look at what is happening with this pink salmon enhanced fishery. Sincerely Krrga board of directors.
Ray DeBardelaben