

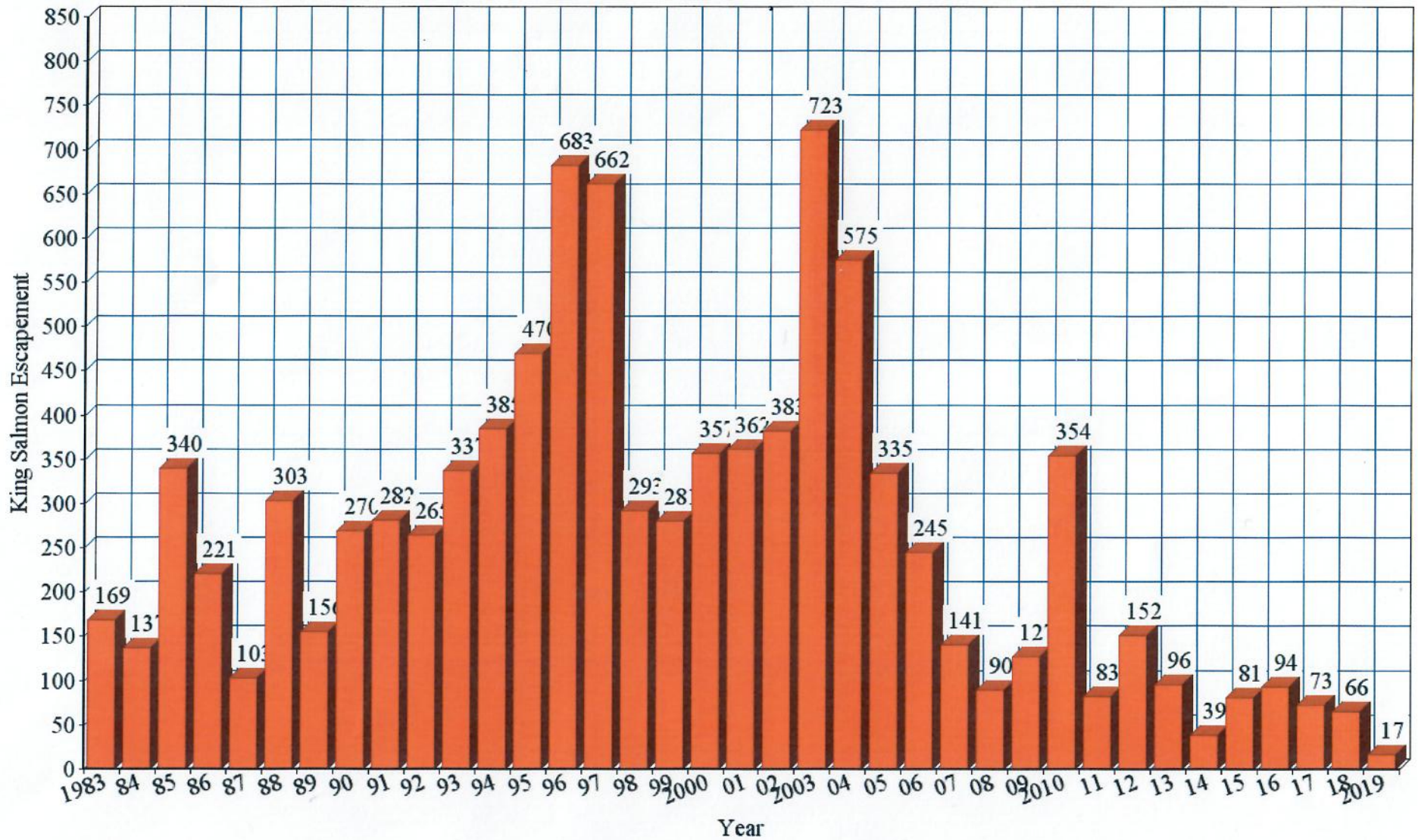


RE: PROPOSAL 46 Establish a sport fishing season for king salmon in the Dog Salmon River

See attachments: Bar Graph, Line Graph and data from historical ADF&G Dog Salmon River Weir counts. Looking at the historical weir counts from Dog Salmon River for King Salmon, 2019 is a historical low of ONLY 17. The historical average over the past 37 year period is 263 of which ONLY 6% of the average returned to spawn in 2019. The proposal to open the Dog Salmon River to a King Salmon sport fishery with these current low numbers is premature. The run is at a very high risk of not being able to recover from these low escapement numbers unless conservation efforts are enacted quickly. In the summer of 2019 ADF&G had an emergency sockeye fishery opening in the Dog Salmon River which made salmon migration upstream completely impassable. The result of this decision was the by catch of King Salmon destined for spawning in the Dog Salmon River. This is a possible reason the King Salmon Escapement was only 17 for the past summer of 2019. In conclusion, opening a sport fishery for King Salmon and a continued commercial salmon fishery allowed in the Dog Salmon River with recent historical low returns will eventually cause this Wild King Salmon run to go extinct. Until escapement numbers return to the historical average I oppose Proposal 46 allowing a King Salmon Sport Fishery in the Dog Salmon River.



Dog Salmon River King Escapement 1983-2019

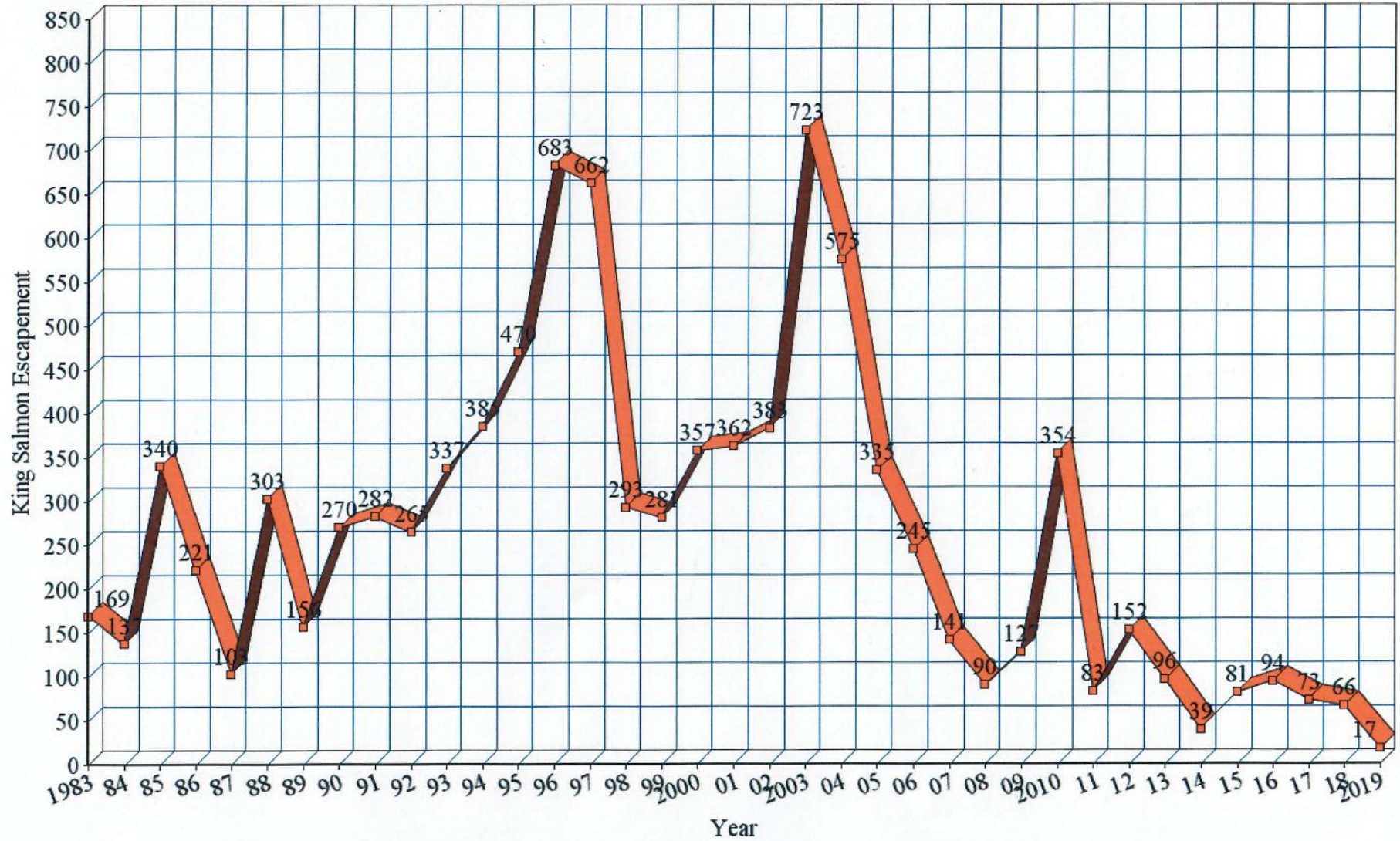


**Dog Salmon Creek Total Escapement by Year and Species.**

Year	Sockeye	Late Run Sockeye	Sockeye Jacks	Sockeye Adults	Chinook	Pink	Coho	Chum	Steelhead Down	Steelhead Up	All Species
1963	359	0	0	0	0	387	2	41	0	0	789
1983	166,655	0	0	0	169	54,943	5,033	18,124	275	39	245,238
1984	48,844	0	0	0	137	55,964	1,340	18,121	80	2	124,488
1985	506,336	0	0	0	340	141,869	4,000	11,768	239	30	664,582
1986	136,553	0	0	0	221	149,194	5,394	9,134	270	23	300,789
1987	48,956	0	0	0	103	55,993	6,223	29,041	385	16	140,717
1988	241,970	0	0	0	303	59,489	3,543	30,680	180	13	336,178
1989	362,007	0	0	0	156	315,559	5,668	4,690	103	23	688,206
1990	254,540	0	0	0	270	4,718	6,484	6,520	457	2	272,991
1991	288,013	0	0	0	282	114,158	5,158	3,277	124	1	411,013
1992	206,406	0	0	0	265	19,306	7,940	8,419	110	0	242,446
1993	198,412	0	0	0	337	161,255	4,985	4,158	184	17	369,348
1994	240,913	0	0	0	385	82,903	4,944	4,274	221	8	333,648
1995	222,170	0	0	0	470	204,231	4,172	2,180	205	2	433,430
1996	208,638	0	0	0	683	212,978	4,382	5,630	104	9	432,424
1997	268,328	0	0	0	662	136,608	3,733	5,336	191	0	414,858
1998	245,393	0	0	0	293	525,944	5,042	3,222	69	34	779,997
1999	222,970	0	0	0	281	161,109	4,139	3,659	217	13	392,388
2000	173,343	0	0	0	357	119,740	3,168	8,063	237	55	304,963
2001	163,309	0	0	0	362	72,370	1,505	6,086	335	12	243,979
2002	105,988	0	0	0	383	561,450	6,552	6,096	180	53	680,702
2003	262,731	0	0	0	723	76,493	29	2,261	185	0	342,422
2004	226,266	0	0	0	575	296,929	20	2,387	242	0	526,419
2005	152,959	0	0	0	335	30,314	36	3,185	166	0	186,995
2006	108,343	0	0	0	245	171,811	885	14,527	447	0	296,258
2007	139,808	0	0	0	141	59,032	30	4,233	444	0	203,688
2008	153,276	0	0	0	90	106,331	22	1,748	605	0	262,072
2009	147,798	0	0	0	127	26,705	46	1,212	104	0	175,992
2010	135,100	0	0	0	354	170,645	86	3,696	50	0	309,931
2011	180,603	0	0	0	83	21,343	115	2,607	34	0	204,785
2012	154,416	0	0	0	152	398,687	127	1,634	28	1	555,045
2013	129,369	0	0	0	96	28,840	215	1,594	104	0	160,218
2014	217,461	0	20,897	196,564	39	119,352	863	1,403	98	0	556,677
2015	235,813	0	44,463	191,350	81	218,054	2	2,203	195	1	692,162
2016	150,469	0	5,294	145,175	94	125,318	26	2,963	171	0	429,510
2017	141,912	0	29,624	112,288	73	325,629	6	8,455	144	0	618,131
2018	232,526	0	62,052	170,474	66	250,509	58	2,440	219	10	718,354
2019	162,697	0	44,978	117,719	17	372,414	4	181	621	0	698,631



Dog Salmon River King Escapement 1983-2019





RE: PROPOSAL 46 Establish a sport fishing season for king salmon in the Dog Salmon River

I don't see any reason to open sport fishing for kings on the Dog Salmon River, or Frazer Lake. I think if the Chinook make it into the River or lake they should be free to spawn unmolested. This new and developing fishery will have negative impacts on the subsistence and commercial fishing in the Alitak District. If this proposal were to be adopted it will undoubtedly cause gear conflicts in the future. Sport fishers will lobby to restrict commercial and subsistence use to further increase the kings available to sport fishers. This is exactly what they have done in every other system they have been allowed access. And exactly what they are doing in other proposals this board cycle.



RE: PROPOSAL 48 Establish a management plan for the Kodiak Area rockfish sport fishery and a guideline harvest range for the Kodiak Area commercial rockfish fishery

Chairman Morisky and BOF members, The Alaska Jig Association (AJA) supports proposal 48. We appreciate the importance of both the sport/ charter, and commercial jig black rockfish fisheries to Kodiak's economy and well being. We believe that a proactive and long term approach to managing the increasing sport/ charter harvest is warranted, and is in the best interest of all user harvester groups. The additional potential restrictions listed in this proposal are management tools, that may enable the Department, to effectively and sustainably control the sport/charter black rockfish harvest. Sincerely, Darius Kasprzak
President, AJA



RE: PROPOSAL 48 Establish a management plan for the Kodiak Area rockfish sport fishery and a guideline harvest range for the Kodiak Area commercial rockfish fishery

Rockfish are slow growing and easily overharvested. Due to their slow growth, limited movement, and relatively small biomass it is not difficult for sport and charter boats to have an outsized impact on their populations. Since the non-pelagic species don't move it is quite easy for any boat, recreational, charter or commercial to repeatedly visit their well defined home ranges. This ease of harvest, and subsequent evidence of overharvest, demands tighter restrictions to protect the stock. ADF&G should be given the tools it deems necessary to manage this fragile stock.



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 27, 2019

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Support for Proposal 48

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries.

We appreciate the forwarding thinking management process found in proposal 48 which would create a new management plan for rockfish in the sport fishery. It would be in the best interest for all user groups and the long-term management of the rockfish fishery to manage these long-lived species in a comprehensive manner. As structured, the proposal provides a series of 5 restrictions to control growth in the sport fishery which has increased 5-fold in the last 5 years. Rather than let the growth continue unabated, resulting in local depletion and allocative issues between the sport and commercial rockfish fishermen, the proposal provides an equitable solution with a suite of tools.

We encourage the board to support proposal 48.

Sincerely,

Charles and Theresa Peterson



December 24, 2019

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

Re: Support for Proposal 48

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and jigging rockfish and live here year-round with my wife.

I appreciate this proactive action proposal to manage the recent growth of the sport fishery focusing on rockfish for the long-term management and health of the stocks and am happy to support the proposal put forward by hardworking ADF&G staff. The proposal provides the tools for the Department to maintain current harvest levels in sport and commercial black rockfish fisheries in the Kodiak Area and curtail further growth in the sport fishery by establishing guideline harvest ranges (GHRs). I also support this because it shows how dedicated our ADF&G staff in Kodiak is as they are working to maintaining the health of our rockfish fisheries.

I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



December 24, 2019

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

Re: Support for Proposal 48

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

I appreciate this proactive action proposal to manage the recent growth of the sport fishery focusing on rockfish for the long-term management and health of the stocks and am happy to support the proposal put forward by hardworking ADF&G staff. The proposal provides the tools for the Department to maintain current harvest levels in sport and commercial black rockfish fisheries in the Kodiak Area and curtail further growth in the sport fishery by establishing guideline harvest ranges (GHRs). I also support this because it shows how dedicated our ADF&G staff in Kodiak is as they are working to maintaining the health of our rockfish fisheries.

Thank you for your consideration of my comments and I look forward to Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 48 Establish a management plan for the Kodiak Area rockfish sport fishery and a guideline harvest range for the Kodiak Area commercial rockfish fishery

As a jig fisherman who commercial harvests black rockfish throughout the Kodiak archipelago and westward regions, I've noticed the rockfish populations around the city of Kodiak are decreasing in both size and numbers. This proposal will give fish and game a better mechanism for conserving this resource.



RE: PROPOSAL 48 Establish a management plan for the Kodiak Area rockfish sport fishery and a guideline harvest range for the Kodiak Area commercial rockfish fishery

I support ADF&G's efforts to control sport and guided sport rockfish removals in Chiniak and Marmot bays. I feel the sport fish division has failed to control growth in the sport fishery for far to long at the expense of the commercial sector and most importantly the resource. I have seen a profound decrease in the CPUE in these areas for many years now, particularly northern Marmot bay, from Hog Island to King Cove . The GHl for the commercial sector has also decreased for the Afognak district by 5,000 lbs. during this same period while the sport harvest continues to increase. The commercial sector works very closely with ADF&G staff to ensure we stay within the our GHl's for black rockfish. Often times closures are announced with little notice and in the event two or more vessels want to cleanup an area (with less than a trip limit available per vessel) we will work closely with each other and ADFG to ensure we do not exceed the GHl in that district. As a result our removals rarely exceed the GHl for the areas we fish. We are also required to submit logbooks after each trip. This requirement should also apply to charter operators to allow better inseason management and allow for bag limit reductions inseason if catch rates indicate the sport removals will exceed the guideline harvest range. Thank you for your consideration.
Leonard Carpenter



RE: PROPOSAL 49 Create a Kodiak Area commercial sablefish season

I have longline for halibut around Kodiak Island for 38 years. I also bought a small amount of Central Gulf black cod quota for by catch. In the fall there are black cod nearer shore but mostly outside the state's three mile zone. I occasionally have caught a few black cod in state waters but the catch of halibut would far exceed the black cod caught. People fishing without halibut quota would be handling far too many halibut to catch a few black cod.



December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Support Proposal 49

The members of the Alaska Board of Fisheries,

I'm writing in **support of proposal 49**, which is intended to establish a state waters sablefish fishery. Kodiak fishermen desperately need new fishing opportunities. The rationalization of halibut and sablefish deprived subsequent generations of reasonable opportunities to harvest these fish in state waters. Additionally, the recent crash of cod stocks and the unreliability of the salmon industry leaves Kodiak fishermen in a particularly vulnerable position. Establishing a new fishery on strong stocks with an abundance-based quota could be very helpful to struggling fishermen.

I'm a resident of Kodiak and the owner/operator of a 42-foot commercial fishing vessel. I participate in the local salmon, tanner crab, and herring fisheries.

Thank you,
Darren Platt



RE: PROPOSAL 49 Create a Kodiak Area commercial sablefish season

The opportunity that this proposal would create is necessary for attract new participants to fishing and keep current ones healthy. This is supportive of small boat fishing, and we need more of that in kodiak. Thank you



RE: PROPOSAL 49 Create a Kodiak Area commercial sablefish season

I support Proposal 49 provided it includes jig gear as a legal gear type and does not impose exclusive or super-exclusive area registration. It is important to provide as many entry level opportunities as possible in the commercial fishing industry. IFQ and Limited Entry created barriers to entry that can be overcome through access to jig opportunity.



Submitted By
Adam Lalich
Submitted On
11/3/2019 7:06:04 AM
Affiliation
f/v YORJIM

Phone
907 359 1332
Email
fishyorjim@gmail.com
Address
box 2583
Homer, Alaska 99603

5AAC 28.005 Proposal 39

I fish in the Western Gulf, Sand point area in the spring, Are quotas are very small and if pot boats go over even smaller, Its a local fleet and a influx of boats, that would be free to move anywhere in the state would shorten are already short state water cod season more so. Every one is a local boat there , except a couple of us but I been there 12 yrs, The jig fleet there needs this and counts on these fish to get thru till salmon.

If anything make it as Kodiak is now, On june 10 drop the exclusive and super exclusive registrations for jig vessels, and a jig vessel will be able to go to different areas and fish freely on uncaught state water quota

Adam Lalich f/v yorjim



RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

Chairman Morisky, and Alaska Board of Fisheries Members: The Alaska Jig Association membership unanimously supports Proposal 39 regarding area registration exemptions for vessels utilizing jig gear in the State waters Pacific cod fisheries. The jig fishery is an entry level fishery, particularly conducive to participation by small boats and single operators. The current registration requirements have resulted in stranded GHJ and have also limited the ability of jig fishermen to move seasonally with other fisheries. It is the Alaska Jig Association's position that exempting the jig fleet from exclusive and super-exclusive area registration requirements will be beneficial to the fleet overall, and therefore strongly support Proposal 39. It is expected that more in depth comments will be provided at the Kodiak meeting. Thank you for considering our position on Proposal 39.
Darius Kasprzak President, Alaska Jig Association

Darius Kasprzak
Alaska Jig Association
12/26/2019 09:13 PM AKST

RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

Chairman Morisky and BOF Members, The Alaska Jig Association (AJA) membership unanimously supports Proposal 39 regarding area registration exemptions for vessels utilizing jig gear in the State waters Pacific cod fisheries. The jig fishery is an entry level fishery, particularly conducive to participation by small boats and single operators. The current registration requirements have contributed to stranded GHJ and have also limited the ability of jig fishermen to move seasonally with other fisheries. The Alaskan jig fleet is currently diminished in numbers and beleaguered- due to current cod scarcity in the Gulf of AK. This proposal would allow Jig harvesters to move unencumbered between areas on the Mainland and Kodiak Archipelago. It is the Alaska Jig Association's position that exempting the jig fleet from exclusive and super-exclusive area registration requirements will be beneficial to the jig fleet overall, and therefore strongly support Proposal 39. Thank you for considering our position on Proposal 39. Darius Kasprzak President, AJA



RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

I have authored similar proposals over several BOF cycles and wholeheartedly support this proposal. If you are looking for an explanation for the large amount of unharvested jig quota, here is the main culprit. The jig fishery is supposed to be an entry level fishery, but exclusive registrations have only served to block entry level participation. While the majority of jig boats fish during a brief period before the salmon season, I'm among a small group of jig vessels who have been fishing over an extended season ending in September. Again and again we've seen effort decline in one area as boats switch to salmon before the quota is reached, despite good fishing, while those of us without other opportunities and willing to travel between areas have been blocked. While numbers on a spreadsheet show untouched quota, they do not show all the boats like mine that have been blocked from harvesting that quota. Cod are fickle and highly mobile creatures. When they have shown up in great abundance in certain areas, willing jig harvesters have repeatedly been blocked from harvesting them. Exclusive and super exclusive registration for jig fishing boats has been a cause of intense frustration. It has done nothing except to strand quota. Somewhat perversely, in a previous BOF cycle I even saw a pot boat owner argue to maintain exclusivity because unharvested jig quota worked to his advantage. Affordable entry level opportunities have almost completely disappeared from Alaska, and exclusive registration has only hurt entry level participation.



December 26th 2019

Dear Chairman Morisky and Board of Fish members:

My name is Bob Bowhay and I own and operate the fishing vessel Moondance a 38 ft. combination seiner/crabber. I currently seine for salmon, have fished halibut and tanner crab and have jigged for cod in both Sand Point and Kodiak. I support proposal 39 - exempting vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

. As one of the very few entry level fisheries I feel that the jig fleet shouldn't be restricted to an exclusive and super exclusive groundfish registration requirement. Like all fisheries, the jig fleet has been struggling for the past few years and has lacked the opportunity to follow the cod. The current exclusive and super exclusive groundfish registration requirements are just another gate put in front of one of the few fisheries that offer entry level opportunities.

Thank you for your consideration of my comments regarding my support of Proposal 39.

Sincerely,
Bob Bowhay
M/V Moondance
P.O. Box 192
Kodiak Alaska 99615



RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

I support this proposal to exempt jig vessels from exclusive registrations. Cod populations fluctuate from year to year and from area to area. If a vessel registers in an area they may find the stocks have moved, are of low abundance or there is not enough quota to support the fleet. Exclusive registrations restrict vessels from making the area changes necessary to make the fishery viable. They also contribute to "stranded" quota that might otherwise be harvested if the vessels were allowed to change areas. The jig fishery provides an opportunity for young fishermen to enter the commercial industry with the relatively low start up costs. It is important to give them the options and the tools necessary to be successful. Eliminating the exclusive registration requirements will be an important step in keeping the jig fleet on the water and contributing to the local economies.



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 27, 2019

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Support for Proposal 39

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries.

A key aspect of the health of a dedicated fishing community is access to the fishery resource by those looking for a path in. The jig fishery represents one of the few entry level opportunities in commercial fishing around Kodiak Island and beyond. Jig fishing is a suitable fishery for a variety of vessels, from skiffs to larger vessels, and the capital investments for the equipment is relatively low. A vessel can outfit with jig gear for under 5,000 and the permit cost is 75. The jig fishery is labor intensive, with each fish coming over the rail one at a time and often handled in a careful manner to promote quality and increased value.

Proposal 39 seeks to provide increased opportunity for the jig sector with additional flexibility to prosecute the Pacific cod fishery in different areas. The exclusive registration was implemented to limit participation in regions and was responsive to local input to curtail effort. It is now evident that exclusive registration is constraining the diminished entry level jig fishery and every effort should be made to support a viable jig fishery. Proposal 39 would allow a jig vessel to explore different areas and use CPUE and processing options to determine where to fish rather. **We encourage the Board to Support Proposal 39.**

Sincerely,

Charles and Theresa Peterson



December 24, 2019

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

Re: Support for Proposal 39

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and live here year-round with my wife.

I support this proposal because it would give the jig fleet the tools they need to effectively harvest the jig cod GHM throughout the state. The jig fleet and allocation to the jig sector represents one of the few entry level opportunities in the State of Alaska, and it is critical to maintain this opportunity and support management changes that can lead to increased harvest.

I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

allowing jig vessels such as myself, fish in multiple areas will help catch stranded quotas, and promote a healthier jig fishing fleet. I do travel through multiple cod management areas and have not been allowed to harvest because of the current exclusive registration rules. Removing these rules, will benefit all.



RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

Dear Board Members: Thank you for considering my proposal. I appreciate the BOF adding this proposal to the LCI meeting schedule and I respectfully request this proposal be considered at the Statewide meeting and amended to include the Alaska Peninsula and Chignik management areas. I am submitting a placeholder comment at this time for the LCI meeting and will submit in depth comments for the Kodiak meeting. In a nutshell, the exclusive and super-exclusive registration areas are a solution looking for a problem. There simply is not enough jig gear in the water to warrant these restrictions and the unintended consequences are detrimental to the jig fleet. For example, the quota in Chignik has literally zero participants most years and the quota is given to the pot fleet. The jig fishery is really the only entry level, small boat fishery in the state. I used my jig operation to finance additional halibut quota in IPHC Area 3B. Area 3B encompasses the south end of Kodiak Island, Chignik, and the South Alaska Peninsula. I retain halibut as a bycatch to my jig fishery for Pacific cod. If the federal cod season is closed, I'm unable to fish most of the 3B area in state waters for cod and retain halibut if I've made landings in other areas. If I were to simply jig halibut, I cannot retain Pacific cod above the bycatch limits in place, even though the cod jig season is open. These sort of "handcuffing" regulations on the jig fleet are stifling and detrimental to economic viability. At the same time we are not seeing any benefit. The Chignik quota for example, is routinely rolled over to the pot fleet, removing the GHL from participants from Sand Point and Kodiak who would harvest at least some of the quota if there was not a super-exclusive registration requirement. In light of the potential GOA Pacific cod closure in federal waters, exempting the jig fleet from exclusive and super-exclusive area registration could make the difference between failure and success for some of the participants in the jig fishery. If in the future it appears that a particular area requires regulation to reduce participation, at that time exclusivity may be an option, whether through area registration or limited entry. Thank you for considering my proposal.

Gregory R. Gabriel, Jr. F/V Miss Michelle



RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

I strongly support this proposal and will be submitting an emergency petition to the Board to not only exempt jig vessels from exclusive and super-exclusive area registration, but to direct the Department to move jig GHL from areas likely to leave stranded GHL to areas that will achieve the jig GHL or to roll the unused jig GHL to the 2021 season. These measures are necessary in light of NMFS Information Bulletin 20-02 which closes the GOA in federal waters to directed fishing for Pacific cod and the seasonal closure of the Trident Seafoods plant in Sand Point in 2020. The jig fleet is an entry level fishery and also an opportunity for diversity to those already participating in other near shore small boat fisheries. In 2019 the South Peninsula jig fleet caught their quota after it was reduced due to pot fishermen over-harvesting the pot quota. After the jig quota was caught, the jig fishery was closed. Meanwhile, the Kodiak jig fleet saw reduced participation and most of the jig GHL rolled over to the pot fleet. There is a strong possibility that the GOA season will again be closed and there will be a reduced or non-existent GHL available for harvest in 2021. Additional opportunity for Black rockfish harvest by the jig fleet could also be made available by removing exclusive and super-exclusive area registration as it pertains to rockfish. The rockfish fishery is only prosecuted with jig gear and does not impact the pot fleet. The bottom line is that the small boat jig fleet in the South Peninsula was forced to stand down when there could have been additional opportunity provided. It is important to point out that subject to vessel length limitations (which should remain unchanged), pot boats can easily convert to jig gear, but jig vessels may not necessarily be able to convert to pot fishing. For example, deck configurations on gillnetters or seiners may not be conducive to stacking or hauling pots. Smaller hydraulic systems and lack of rigging or the cost of investment into pots are all barriers to jig boats participating in the pot fishery. A pot boat merely has to mount jig machines and go fishing to participate in the jig fishery. While the jig fishery provides entry level opportunity and diversification for the local small boat fleets, the economic viability of the jig fleet is stifled by regulations that handcuff jig vessels to particular areas. Cod are migratory and the jig fleet does best on aggregations of fish. When cod are aggregated, the jig fleet is capable of doing quite well as shown by harvests prior to the collapse of the cod stocks. During the 2011-2012 Kodiak GHL jig fishery, harvests approached 1.5 million pounds a week and the GHL was caught in a few weeks. Since then, the jig fleet has been the canary in the coal mine as an indicator of stock decline. The current stock crash began affecting the jig fleet several years before it was noticed by managers and participants in other gear sectors. It is necessary to take strong proactive steps to ensure the economic viability of the jig fleet through this cycle of low cod abundance. Exempting the jig fleet from exclusive and super-exclusive area registration requirements is one step.



My Name is Josh Wisniewski I live in Seldovia Village, my mailing address is PO Box 20 Seldovia, Alaska, 99663.

I support of Lower Cook Inlet subsistence fishing proposals 18, 19, 20

I support Lower Cook Inlet Commercial s salmon hatchery proposals 22, 23, 24, 25, 26, 27

I support other Lower Cook Inlet Commercial Fishing Proposals 29, 31, 34, 39

I am a commercial fishing permit holder. I own a Cook Inlet set net permit and I fish set-net sites in the Barabara subdistrict in Kachemak Bay in the Lower Cook Inlet District. I also commercially fish halibut in Kachemak Bay which is part of Area 3A here in Lower Cook Inlet. Additionally, I participate in Lower Cook Inlet subsistence, fisheries for salmon, halibut rock fish and tanner crab and other shellfish subsistence fisheries.

I am also a cultural anthropologist and completed all of my education here in Alaska, including my Ph.D. in anthropology at the University of Alaska, Fairbanks. I been studying issues related to subsistence and commercial marine harvesting as well as traditional and local ecological knowledge in Alaska and Washington State for over 15 years. I put myself through school in part by commercial fishing here in Lower Cook Inlet and participating in the maritime trades in this area.

I first started participating in Lower Cook Inlet fisheries in 1994 seining for salmon during the summer and set netting after the seining season slowed down as well as halibut fishing. I knew I wanted to be a Kachemak Bay commercial skiff fisherman the first time I walked through Homer Harbor, and I knew Seldovia was home the first time I crossed Kachemak Bay. In addition to fishing here I spent two seasons tendering to set net as well as for Lower Cook Inlet seiners operating in Kachemak Bay. I have also participated in commercial and subsistence fisheries in other parts of the state including owning and operating my own salmon troller and participating in herring egg subsistence harvests in Sitka Sound.

Set netting is the oldest continuously operated commercial fishery in Kachemak Bay. It is the lowest impacts and most sustainable fishery in the Lower Cook Inlet fishing district, and contributes directly to the mixed cash/subsistence economy for many Seldovia, Port Graham and Nanwalek families. Our low impact skiff fishery is perfect scaled for Kachemak Bay and is a true artesian wild-salmon fishery with uniquely hung nets, hooks and jiggers for how they are configured when set.

We predominantly harvest wild sockeye that circulate through Kachemak Bay en-route to spawning streams. Additionally, we harvest all other pacific salmon species as well. Our season begins the first of June and following Copper River we harvest some of the first sockeye to be available for fresh markets. Over all the Kachemak Bay set net fishery is fairly small. Typically, the collective Lower Cook Inlet set net harvest is under 30,000 sockeyes annually based on the 10-year average. Despite it's relatively small take our fishery is a true community fishery and is a critical economic contributor for Seldovia, Nanwalek and Port Graham, the three communities that participate in subsistence fisheries in Kachemak Bay. Our commercial set net fishery directly supports local subsistence fisheries, and the economic and socio-cultural well-being of many area families. As a small fishery I believe ADF&G commercial fisheries management here places managerial priority on the larger boat salmon fisheries. In doing so it does not adequately address how management decisions in support of the seine fishery impact the set net fishery.



including habitat for salmon at the head of Tutka Bay and helps maintain the ecological functionality of Tutka Bay without limiting commercial purse seine fishing opportunities in Tutka Bay

In addition to the proposals identified above I also support commercial fishing proposals 27, 29 31 34, 39. **Proposal 27** identifies Halibut cove as critical habitat that is not conducive to commercial hatchery production. This is based on several factors. Its geographic location in Kachemak Bay State Park, the shallow depth of the lagoon and narrow mouth allowing limited flushing and access, and its role as critical habitat. **Proposal 29** seeks to adjust the boundary for seining in the Rocky Bay subdistrict outward to allow boats to more effectively fish in the subdistrict. I have fished in the Rocky Bay subdistrict I believe this boundary adjustment would support the operations of commercial seine gear targeting Lower Cook Inlet salmon stocks and does not present a conservation issue. **Proposal 31** seeks to adjust boundary to allow for commercial seining on the beach outside of Ursus Cove Lagoon. This would allow for additional fishing opportunities for the Lower Cook Inlet purse seine fleet to target chum salmon returning to a Lower Cook Inlet stream system in the Ursus Cove subdistrict. This boundary adjustment would provide fishing opportunity and present a conservation issue **Proposal 34** seeks to limit the size of purse seines to 150 fathoms in order to limit the harvest of Upper Inlet salmon by the Lower Inlet purse seine fleet and manage the Lower Cook Inlet commercial seine fishery to target Lower Inlet salmon stocks.

Lastly, I wish to emphasize to the Board of Fisheries that as both a small boat commercial fisherman and subsistence harvester I believe that despite the propensity of us fisherman to retreat into our respective gear type camps that all fishermen want the same thing which is a health ecosystem supporting vibrant healthily stocks, the opportunity to fish on them and the assurances these fisheries will be managed to ensure there will be equal opportunities for subsequent generations. All of our fisheries, both wild and hatchery based including, commercial, subsistence, personal use and sport are ultimately dependent upon the health and the integrity of our marine ecosystem. You are all aware that this system is currently undergoing stress and adjustment due to the impacts of climate change and ocean acidification. These realities further mandate that the Board look beyond the politics of fisheries and consider that all fisheries must be appropriately scaled to unique environment and carrying capacity of the setting wherein they take place, and the unique and challenging environmental adjustments our marine environment is experiencing. This I believe should a guiding principle and provide the empirical foundation for management decisions. Marine conservation to support the long-term viability of our fisheries is our collective responsibility as Alaskans.

Thank you for review and consideration of these comments and thank for your service on behalf of all Alaskans.



RE: PROPOSAL 50 Allow six lines per mechanical jigging machine and six machines per vessel to be operated in the Kodiak Area Pacific cod fishery

Chairman Morisky and BOF members, The Alaska Jig Association (AJA) membership unanimously supports Proposal 50. Adding a 6th jigging machine to the deck of a mid size or large jig vessel, would make this jigging operation more efficient, as a captain and his two crew members could each equally work two machines. Status quo dictates that one fisher in this scenario, is often partially idled, by only having one jig machine with which to work. Increasing efficiency through an additional jigging machine will lead to greater jig sector proficiency, and help to reduce stranded jig GHJ quota. Also, many jig machines contain stress-prone mechanical components and complex computer circuitry. It follows that jigging machines are subject to breakdowns, which often require in shop repair after return to port. The option of having an extra legal jigging machine on deck, would help in alleviating jig fishing disruption, due to the often inevitable jigging machine failure. Sincerely,
Darius Kasprzak President, AJA



December 26th 2019

Dear Chairman Morisky and Board of Fish members:

My name is Bob Bowhay and I own and operate the fishing vessel Moondance a 38 ft. combination seiner/crabber. I currently seine for salmon, have fished halibut and tanner crab and have jigged for cod in both Sand Point and Kodiak.

I support Proposal 50 (proposal to allow six machines per vessel in the Pacific Cod Fishery) for the following reason. I currently work 4 machines on deck with myself and one crewman (two on deck), adding a 5th machine does not give me that ability to justify a second crewman, but the ability to have six machines would give my operation the opportunity to keep myself and two crewmen busy, working two machines each.

Thank you for the opportunity to provide comment and hope you will understand how supporting this proposal will enhance the productivity of our small jig vessels.

Sincerely,

Bob Bowhay
M/V Moondance
P.O. Box 187
Kodiak Alaska 99615
907-539-6389



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 26, 2019

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Support for Proposal 50

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries.

A key aspect of the health of a dedicated fishing community is access to the fishery resource by those looking for a path in. The jig fishery represents one of the few entry level opportunities in commercial fishing around Kodiak Island and beyond. Jig fishing is a suitable fishery for a variety of vessels, from skiffs to larger vessels, and the capital investments for the equipment is relatively low. A vessel can outfit with jig gear for under 5,000 and the permit cost is 75. The jig fishery is labor intensive, with each fish coming over the rail one at a time and often handled in a careful manner to promote quality and increased value.

Proposal 50 seeks to provide increased opportunity for the jig sector with a 6th machine for vessels interested in employing 2 crew. This proposal would provide increased efficiencies, increased employment opportunity and may help alleviate stranded cod in the jig sector.

We encourage the Board to Support Proposal 50.

Sincerely,

Charles and Theresa Peterson



RE: PROPOSAL 50 Allow six lines per mechanical jigging machine and six machines per vessel to be operated in the Kodiak Area Pacific cod fishery

As a jig fisherman, having more jig machines on deck and ready to fish, are an advantage, as machines break sometimes and time spent fixing or replacing them is lost fishing time, and during the hot fishing times, a jig boat can carry more crew and stay productive.



RE: PROPOSAL 50 Allow six lines per mechanical jigging machine and six machines per vessel to be operated in the Kodiak Area Pacific cod fishery

I support this proposal as a way to make the jig fleet more efficient and economically viable. Often a jig boat has to travel long distances in order to find an aggregation of fish. Once a boat puts fish on board, there are about two to three days of harvesting before the fish must be delivered to market. Adding an additional jig machine can mean the difference between covering the bait, fuel, food and crew costs and making money, or losing money on the trip. Usually, there are not tenders assisting the jig fleet, and each trip adds or detracts from the bottom line. Allowing harvest of cod and black rockfish on the same trip would also help create economic viability to the jig fleet. As it stands now, a boat jigging cod is limited to bycatch for rockfish, and the same boat jigging rockfish is limited to bycatch on cod, even though both seasons are open.



RE: PROPOSAL 51 Amend Kodiak Area Pacific cod state-waters guideline harvest level allocation to 40 percent jig gear and 60 percent pot gear, and amend the allocation annually based on harvest levels the previous year

Chairman Morisky and BOF members, The Alaska Jig Association (AJA) membership is adamantly, and unanimously opposed to Proposal 51. The jig fishery is one of the only entry level commercial fisheries left in the state of Alaska. This low capital intensive, low bottom impact, clean and sustainable, entry level fishery utilizing hand tended hook and line- should and must not be negated by reallocation of quota, or other related policy or management actions. As structured, this proposal indicates that the Kodiak State Water jig fleet would immediately suffer loss of quota, and then continue to step down in terms of quota loss during years of poor harvest. The inevitable result is that when the good harvest years resume, the beleaguered jig fleet will then be hamstrung by accumulated quota loss. The jig fleet will be unable to capitalize fully on the opportunity of good fishing, and will most likely be marginalized into perpetuity. The pot fleet already, and currently has access to jig quota through fall rollover provisions. Other options exist to address sharing jig quota during poor seasons, other than by penalizing the jig fleet with draconian and crippling permanent reallocation measures. The jig fleet is serious about compromising and finding a middle ground with the pot fleet, and has submitted proposal 54 in order to explore a much fairer option. Sincerely, Darius Kasprzak President, AJA



RE: PROPOSAL 51 Amend Kodiak Area Pacific cod state-waters guideline harvest level allocation to 40 percent jig gear and 60 percent pot gear, and amend the allocation annually based on harvest levels the previous year

This proposal is based on an artificial premise, that jig vessels were continually unwilling or unable to harvest the Kodiak jig quota. As I look back at previous years' catch reports, I see that many years with unharvested jig quota were also years in which I wanted to move among registration areas. I was blocked by exclusivity rules. The mix of potential state and federal quota meant that I was forced to make an early guess at the best area for me each year. I was wrong about those early season guesses in some years, only to watch in frustration as jig quota sat stranded in other areas. The jig fishery was meant to be an open entry level fishery, but entry level fishermen have been locked out of full participation. There has always been a group of jig fishermen without other opportunities who were perfectly willing to move among areas but blocked from doing so. Note that Proposal 39 is a solution to this problem, and similar proposals have been made to BOF since 2013. Cod stocks have plummeted since 2015, so we are now operating under different conditions. You should note that reallocating quota to pot boats wouldn't have affected the harvest in 2017, since pot boats only harvested half of their initial allocation. In 2019 we see a jig rollover to pot boats. That rollover allowed for the full GHJ to be reached. Proposal 39 and the existing rollover provision, when combined, will preserve the entry level opportunity of the jig fishery while eliminating the quota stranding problem of previous years. Proposal 51, a re-allocation of quota to pot boats, is yet another barrier to entry level fishermen in an industry that has already become prohibitively burdensome for new participants. As the 2019 harvest has shown, pot boats can already harvest any jig quota without harming the potential for entry level fishermen.



December 26th 2019

Dear Chairman Morisky and Board of Fish members:

I oppose Proposal 51 because:

1. As a small vessel entry level fishery, weather and the ability to harvest jig quota varies from year to year. To be penalized for the inability to harvest allocated harvest in a given year and to have that number dictate the jig harvest for the following year is unfair.
2. As with any fishery, new entrants into the fishery experience a steep learning curve, and to be penalized with regards to quota for the following year does not make sense. The jig fishery is an important financial step for new entrants, giving them the ability to buy into other fisheries.
3. Leaving cod in the ocean is a long-term win/win for both gear types in future years. Cod are not 'stranded' if not harvested and continue to reproduce.
4. There are other mechanisms in place to harvest stranded cod in the fall season without a permanent reallocation.

Please keep in mind during your deliberations that we have consistently witnessed the demise of our small vessel fleets/fisheries due the lobby of larger vessels and more efficient gear types. Efficiency does not necessarily promote strong fish stocks and fisheries, quite the contrary – efficiency usually promotes the whittling down of our fleets to a few catchers that have been able to manipulate management.

Sincerely,

Bob Bowhay
F/V Moondance
P.O. Box 187
Kodiak Alaska 99615
907-539-6388



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 26, 2019

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 51

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries.

A key aspect of the health of a dedicated fishing community is access to the fishery resource by those looking for a path in. The jig fishery represents one of the few entry level opportunities in commercial fishing around Kodiak Island and beyond. Jig fishing is a suitable fishery for a variety of vessels, from skiffs to larger vessels, and the capital investments for the equipment is relatively low. A vessel can outfit with jig gear for under 5,000 and the permit cost is 75. The jig fishery is labor intensive, with each fish coming over the rail one at a time and often handled in a careful manner to promote quality and increased value.

Proposal 51 seeks to reduce entry level opportunity in one of the few entry level opportunities left, jigging. The proposal would permanently reallocate a portion of the potential jig harvest and continue to erode the opportunity in the years when the jig sector is unable to harvest the allocation. The resulting scenario would be a diminished harvest opportunity when the conditions were favorable for jig harvest and it would take years to build the jig allocation back. We recognize the need to provide increased harvest for the pot sector when the jig fleet is unable to harvest the jig allocation but believe this can be better accomplished through proposal 54. We are adamantly opposed to proposal 51 as written but willing to work together with the pot sector with hopes of finding common ground.

Sincerely,

Charles and Theresa Peterson



December 24, 2019

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

Re: Opposition for Proposal 51

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and jigging rockfish and live here year-round with my wife.

I strongly oppose this proposal for several reasons. The jig fishery represents critical entry-level opportunity and no management or policy decisions should diminish this. Rollovers from the jig fleet already exist and currently provide a mechanism to harvest "stranded cod" in the fall season for pot fishermen. There should be absolutely no changes to allocation structures during crisis points such that we are experiencing with cod. Please do not accept proposals from the pot cod sector to take away from the jig fleet in the Kodiak region, or elsewhere.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



December 24, 2019

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

Re: Opposition to Proposal 51

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

I strongly oppose this proposal for several reasons. The jig fishery represents critical entry-level opportunity and no management or policy decisions should diminish this. Rollovers from the jig fleet already exist and currently provide a mechanism to harvest "stranded cod" in the fall season for pot fishermen. There should be absolutely no changes to allocation structures during crisis points such that we are experiencing with cod. Please do not accept proposals from the pot cod sector to take away from the jig fleet in the Kodiak region, or elsewhere.

I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board slicing away at what is held up as a critically important entry point into the fishing industry for young people. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly and strongly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 51 Amend Kodiak Area Pacific cod state-waters guideline harvest level allocation to 40 percent jig gear and 60 percent pot gear, and amend the allocation annually based on harvest levels the previous year

I am jig fisherman, I was able to go into debt and buy a boat based on the 50% cod allocation to the jig sector. I had some very productive jig seasons and needed every bit of the current allocation to pay off my boat, buy halibut quota and convert my boat to salmon tender, none of this could have been possible if the jig allocation was at 20% as this proposal could make it to be. There already exists a mechanism for fish and game to fairly manage the fishery, so cod is not stranded. I support the current process of management. A small boat fishery is essential to attract new entrants to fishing, and the cod jig fishery is the only one left that can give people like me the opportunity to progress in the fishing world. Keep the hope alive and support the Kodiak community and healthy fishing opportunity. Thank you



RE: PROPOSAL 51 Amend Kodiak Area Pacific cod state-waters guideline harvest level allocation to 40 percent jig gear and 60 percent pot gear, and amend the allocation annually based on harvest levels the previous year

I oppose proposal 51. I am a jig fisherman, I was able to get a boat, pay for it and buy halibut quota, and convert my boat to a salmon tender, because of the 50% cod allocation to the jig sector. I needed every bit of that quota on the good years, when we harvested that quota. if that quota was at 20% like this proposal could set it at, I and many others would not have gotten as far as we did. It is the last entry level fishery left, it attracts new participants into the fishery, and keeps Kodiak a healthy fishing community. A mechanism already exists for the cod to be harvested, fish and game has been fair to both gear types and no change is necessary. this small boat fishery is good for all, it provides a better way to manage cod, pot fishing stops during the cod spawn, and those fish set aside for the jig fleet can reproduce, before getting caught. That maybe the reason why the pot fleet enjoys success every year. We don't need to make changes in the fishery, especially with the cod disaster we are having. Thank you



RE: PROPOSAL 51 Amend Kodiak Area Pacific cod state-waters guideline harvest level allocation to 40 percent jig gear and 60 percent pot gear, and amend the allocation annually based on harvest levels the previous year

In light of NMFS Information Bulletin 20-02 closing the GOA to directed fishing for Pacific cod the Board should take no action on this proposal. The future of the jig fishery is uncertain at this time looking towards 2021 and beyond due to low cod abundance and reallocation to the pot fleet is not justified. A pot boat can easily convert to jig fishing by adding jig machines. However, a jig boat for a variety of reasons, including cost and deck configurations cannot easily convert to pot fishing.



has cautioned jig vessels to get as much cod fishing in as possible before the pot fishery opens, due to the likelihood of exceeding the pot GHL and closing the fishery for the year.

Reallocation also sets the stage for limited entry by the pot fleet. Any jig allocation lost to the pot sector through reallocation and step down provisions will be locked up, and any chance for the jig gear allocation to step back up would be lost if the pot gear fishery were to become limited entry.

Seiners, longliners, gillnetters, and pot fishermen have all participated in the Kodiak jig fishery throughout the years. Jigging cod has been a great opportunity for many local fishermen to fire up their vessels, shake the winter cobwebs off, and make some money before the salmon season starts. For others, a way to make some extra money or keep their crews busy until the next fishery. And for many of us it was the beginning of vessel ownership and a career running our own vessels.

This is what makes the jig fishery so unique and why protecting it and the current allocation is so important. I hope the Board will continue to provide open access opportunities for future entrants into Alaska's commercial fisheries by protecting the current Kodiak Area Pacific cod jig gear allocation.

I respectfully request the Board to **reject proposal 51**, and thank you for the opportunity to comment.

Sincerely,

Leonard Carpenter



Leonard Carpenter
Box 1970
Kodiak, Ak. 99615

12/25/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 51

Dear Chairman Morisky and Board of Fish members:

My name is Leonard Carpenter. My family and I own the F/V Fish Tale and have participated in the Kodiak Area cod jig fishery for two decades. I am submitting written comment today on behalf of myself and my family.

We feel very strongly about the importance of the Kodiak Area jig fishery and the opportunities it provides to new entrants coming into Alaska's fisheries. **We do not support Proposal 51**, or any other form of reallocation between the pot and jig sectors.

Proposal 51 fails to solve the problem of any unharvested jig gear GHL being **harvested during the year it is allocated**. Even with a 10% reallocation and step down provisions, that year's unharvested GHL still remains lost to the community year after year.

Given the uncertain future of cod it is premature to consider any changes to gear allocations. Current inseason roll-over provisions afford pot vessel the opportunity to fish on unharvested jig GHL, but have been preempted by the federal 'B' season since the Stellar sea lion protection measures were implemented in 2003. Prior to that unharvested jig GHL was reopened to pot gear on September 1. With the likelihood of no federal fishery in the foreseeable future, unharvested jig GHL will once again be available for pot gear in the fall. Also, with the environmental changes we have experienced over the last few years, no gear type in the federal or state cod fisheries have been immune to stranded fish. Even the pot sector failed to harvest their Kodiak Area state waters GHL in 2017.

Of particular concern is that small pot GHL's are extremely hard for ADFG staff to manage, and as the pot fishery historically closes before the jig gear GHL is taken, any harvest exceeding the pot GHL is taken out of the jig GHL. This has occurred in Kodiak in the past and the South Alaska Peninsula this year, costing jig fishermen hundreds of thousands of dollars in lost revenue. Timing of closure announcements are critical and the difference of a few hours could wipe out the entire jig GHL for the year, effectively closing our season before it even opens. ADFG staff has even expressed that concern for the 2020 season in South Alaska Peninsula, and



RE: PROPOSAL 52 Increase the guideline harvest level (GHL) for Pacific cod in the Kodiak Area to 17.5 percent of the estimated total allowable harvest of Pacific cod in the Central Gulf of Alaska Area and increase the pot gear allocation of the GHL to 65 percent

I am a cod jig fisherman, this proposal is going down the road to overfishing. We are currently experiencing a cod disaster, and the need to conserve is paramount. This is not the time to increase harvest percentages. Perhaps the reason why the pot fleet enjoys a quick, productive cod harvest is because of the current harvest levels, that and the 50% cod allocation set aside for the jig fleet, stops the pot fleet from fishing during the entire spawn season, allowing more cod to enter the environment. The 50% cod allocation is a great strategy to conserve the resource. this is not the time to make any changes in the cod fishery. no need to find the boundary on the over harvest levels. Thank you.



December 24, 2019

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

Re: Opposition for Proposal 53

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and jigging rockfish and live here year-round with my wife.

The way I read this proposal the thesis does not seem ecologically sustainable – that the pot fleet would be able to go after any unharvested Kodiak area state waters Pacific cod jig quota the *following calendar year*. This does not seem plausible as it would not be additive the following season and would have to be taken from somewhere, from jig fishermen, to make sure GHL sustainability limits are met. Fish stocks naturally fluctuate and an inter-annual rollover on a low abundance year would make overfishing inevitable. It just doesn't make sense. Furthermore, during a time of cod collapse and the closure of the federal fishery for 2020 it means that every single propagating cod left in the water helps to rebuild and sustain the stock. Therefore, I do not accept the argument that “stranded quota” in this time of crisis and uncertainty is a credible reason to make this kind of change. If this proposal were to be successful, I believe it could actually cause long-term negative impacts to the community of Kodiak and industry as a whole that has a strong reliance on cod.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



December 24, 2019

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

Re: Opposition to Proposal 53

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

The way I read this proposal the thesis does not seem ecologically sustainable – that the pot fleet would be able to go after any unharvested Kodiak area state waters Pacific cod jig quota the *following calendar year*. This does not seem plausible as it would not be additive the following season and would have to be taken from somewhere, from jig fishermen, to make sure GHL sustainability limits are met. Fish stocks naturally fluctuate and an inter-annual rollover on a low abundance year would make overfishing inevitable. It just doesn't make sense. Furthermore, during a time of cod collapse and the closure of the federal fishery for 2020 it means that every single propagating cod left in the water helps to rebuild and sustain the stock. Therefore I do not accept the argument that “stranded quota” in this time of crisis and uncertainty is a credible reason to make this kind of change. If this proposal were to be successful, I believe it could actually cause long-term negative impacts to the community of Kodiak and industry as a whole that has a strong reliance on cod.

I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes between Kodiak Area state waters Pacific cod jig and pot gear quota. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly and strongly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 53 Add unharvested Kodiak Area state-waters Pacific cod jig gear quota to the pot gear allocation the following calendar year

As a commercial fisherman that relies on a healthy cod resource for survival, cannot agree with this pattern of overfishing. Its fine to leave cod in the water, as a conservation effort. Cod, like a lot of other species cod are overfished. Especially, with dramatic changes from year to year, we cannot apply previous years science to establish a current harvest level, this is irresponsible management. Its ok to more fish in the water, once they get overfished, its too late and everyone suffers for years. Thank you



RE: PROPOSAL 53 Add unharvested Kodiak Area state-waters Pacific cod jig gear quota to the pot gear allocation the following calendar year

The current status of cod stocks and the closure of the GOA to directed fishing for cod indicate a fishery on the verge of collapse. The jig fishery is a small boat, entry level fishery and any unharvested GHL should roll over to the JIG fleet for 2021 and NOT the pot fleet. Pot boats can participate in the jig fishery, but not vice versa.



RE: PROPOSAL 54 Open a Kodiak Area commercial pot gear Pacific cod fishery on May 8 for half of the remaining jig gear allocation

Although well meaning, this proposal was generated prior to NMFS IB 20-02 which closes the GOA to directed cod fishing. Jig GHL should be held by the jig fleet and rolled over to 2021 in the event of another federal closure or reduced GHL.



RE: PROPOSAL 54 Open a Kodiak Area commercial pot gear Pacific cod fishery on May 8 for half of the remaining jig gear allocation

This would take away the very smallest boats opportunity to make money and give it to larger pot fishing boats. I was a crewman on a jig boat that caught 20k lbs on May 20th and it saved the season. Thank you,



RE: PROPOSAL 54 Open a Kodiak Area commercial pot gear Pacific cod fishery on May 8 for half of the remaining jig gear allocation

Chairman Morisky and BOF members, The Alaska Jig Association (AJA) has authored Proposal 54 in order to address stranded Pacific cod GHL in the jig sector during lean seasons of low inshore biomass, while providing additional harvesting ability to the pot sector. Our membership stands unanimously opposed to any kind of permanent reallocation of GHL, as the jig sector represents low capital and entry level opportunity, for the next generation and beyond. This action would not result in permanent reallocation. It would instead provide an immediate trigger, on an annual basis, to provide substantial additional harvest opportunity to the pot sector. The department would have the flexibility and ability, to determine whether an early inseason rollover to the pot fleet is warranted, based on the current year's level of Jig effort and harvest. This proposal represents a good faith effort to share jig GHL with the pot sector; without crippling the jig fleet through draconian and permanent reallocation. This proposal specifies a May 8 GHL rollover date to the pot fleet, depending on the department's judgement call and direction. May 8 is a starting place for discussion about a best compromise rollover date consisting of half of the jig GHL quota, and it may be possible to further compromise with the pot fleet by adjusting this inseason rollover date through the BOF meeting committee procedures. Thank you sincerely for your consideration of our proposal, Darius Kasprzak President, AJA



RE: PROPOSAL 54 Open a Kodiak Area commercial pot gear Pacific cod fishery on May 8 for half of the remaining jig gear allocation

I support the Alaska Jig Association's proposal to allow a partial rollover of jig quota to pot boats in May. As a long time jig fisherman I'm acutely aware of the various problems that have led to jig quota being stranded in previous years. Many of the problems have been entirely artificial regulatory issues. Please note that Proposal 39 (if adopted) and the recently enacted rollover provision to allow pot harvest of jig quota after a certain date serve to remove the artificial barriers that have prevented the full harvest of jig quota. Regardless of the regulatory hurdles, all jig fishermen understand that there are certain times when fish have not been available to the jig fishery. They may be too widely dispersed, absent, or simply not in a mood to bite a hook. Proposal 54 seeks to address this potential for stranded quota by releasing it to other gear types (pots) at an earlier date than the current rollover provision, while preserving the benefits of an open entry level fishery. This flexibility has a history in the jig fishery, though sadly not at the state level. Oddly, our one "state entry level" fishery has actually been sustained through the flexibility of federal quota managers. While fishing with a group of small jig boats in the western gulf, once the exclusive state fishery closed, we could take advantage of excellent fishing conditions and the flexibility of federal managers who simply moved stranded quota from one federal fishery to another. There have been proposals since 2013 to drop exclusivity in state jig registrations. Exclusivity strands jig quota. The lack of adequate rollover provisions has also stranded quota. I have seen that federal managers can reduce stranded quota when given the flexibility to use their discretion in small re-allocations, and I support giving the same flexibility to ADF&G.



December 26th 2019

Dear Chairman Morisky and Board of Fish members:

My name is Bob Bowhay and I own and operate the fishing vessel Moondance a 38 ft. combination seiner/crabber. I currently seine for salmon, have fished halibut and tanner crab and have jigged for cod in both Sand Point and Kodiak.

I support Proposal 54 for the following reasons:

1. In contrast to Proposal 51 which I oppose, Proposal 54 would NOT create a permanent reallocation scheme for the Jig sector, but would provide for an immediate method to reallocate cod to the Pot sector on an annual basis, and not penalizing the jig fleet for future cod harvests.
2. The jig sector in good faith wants to work with the pot sector and understands their concern of leaving cod 'stranded' in the ocean that should be available to them for harvest. This proposal would provide a compromise allowing for additional cod harvest by the pot sector if warranted as well as a starting point for further discussion regarding the equitable harvest by both gear types.

Thank you for your consideration of my comments.

Sincerely,

Bob Bowhay



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 26, 2019

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Support Proposal 54

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries.

A key aspect of the health of a dedicated fishing community is access to the fishery resource by those looking for a path in. The jig fishery represents one of the few entry level opportunities in commercial fishing around Kodiak Island and beyond. Jig fishing is a suitable fishery for a variety of vessels, from skiffs to larger vessels, and the capital investments for the equipment is relatively low. A vessel can outfit with jig gear for under 5,000 and the permit cost is 75. The jig fishery is labor intensive, with each fish coming over the rail one at a time and often handled in a careful manner to promote quality and increased value.

Proposal 54 was submitted by the members of the jig sector to provide access to the jig allocation to the pot sector on an annual basis when it is determined the jig fleet will not be able to catch the fish. The action seeks to provide harvest opportunity on an immediate basis to the pot sector but does not result in a permanent reallocation and diminished entry level opportunity to the jig fleet. Pacific cod is a valuable species to our coastal communities, and it is important to provide harvest opportunity between sectors when needed. This proposal is structured to use the expertise of area managers to consider the level of participation and CPUE in the jig fleet and roll quota to the pot cod sector in the Spring. There has been quite a lot of discussion in the Kodiak community in regards to the date identified in the proposal, May 8th, as being too late to realistically provide harvest opportunity to the pot sector. We are willing to talk about a date that works and hope the jig and pot sector can work together on the cod proposals. Given the current status of Pacific cod stocks in the Gulf of Alaska, if a compromise position cannot be reached at this meeting there will be time to work it out.

Sincerely,

Charles and Theresa Peterson



RE: PROPOSAL 54 Open a Kodiak Area commercial pot gear Pacific cod fishery on May 8 for half of the remaining jig gear allocation

I am a jig fisherman, and sometimes conditions make difficult for the jig fleet to harvest all of the jig quota. currently, fish and game rolls the remaining unharvested jig quota to the pot fishing fleet after federal B season is harvested, that season begins in september. under this proposal, potentially stranded cod can be harvested earlier than the fall fishery.



Leonard Carpenter
Box 1970
Kodiak, Ak. 99615

12/25/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Support Proposal 54

Dear Chairman Morisky and Board of Fish members:

My name is Leonard Carpenter. My family and I own the F/V Fish Tale and have participated in the Kodiak Area cod jig fishery for two decades. I am submitting written comment today on behalf of myself and my family.

When we bought our vessel over twenty years ago, it was on a wing and a prayer. Formerly a Cook Inlet gillnetter and ill equipped for most of Kodiak's fisheries, it represented a huge opportunity for us, and harvesting cod with jig gear was the first fishery we participated in as new vessel owners.

It allowed us the opportunity to access a fishery, where very little capital investment is required, and diversify our operations from there. It has been the springboard that has allowed us to rig our vessel to seine, fish crab, longline cod and halibut. It has allowed us to buy a home and raise our family in Kodiak. We owe everything to the Kodiak cod jig fishery, for it was our start, and it is the very reason I am writing this today.

So as I think of the Kodiak fishing fleet, and the men and women that work the water, I see the faces of many that started their fishing careers on the back deck. Men and women that gained experience and confidence as deckhands, and later went on to buy their own fishing vessels. Many of them also started out as jig fishermen, some plotting this course well before us, while others have followed in our wake, often times a decade or more later.

It truly is a powerful testament to the importance of the jig fishery, that for over two decades it has provided entry level access to Alaska's fisheries, and has been a vital stepping stone from the back deck to vessel ownership and the wheelhouse.

That is why we feel this fishery is so important and worth protecting. This is why we **support Proposal 54** as an alternative to any reallocation.

Proposal 54 allows management the ability to make remaining jig GHL available to pot gear inseason, if catch rates and effort indicate the jig GHL will not be fully harvested. It also gives



Kodiak fishermen the opportunity to harvest the fish **during the current year**, opportunity and revenue that would otherwise be lost forever.

Give Fish and Game the tools they need to manage this fishery in-season again, for the maximum benefit of all gear types and our community.

Protect our jig gear GHL allocation from erosion by reallocation and step down provisions, and continue to provide entry level opportunities to new entrants into Alaska's fisheries.

I respectfully request the Board to **approve proposal 54**, and thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard Carpenter", with a long horizontal flourish extending to the right.

Leonard Carpenter



Robert Fellows
266 E Bayview Ave.
Homer, AK. 99603

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, Ak. 99811-5526

RE: Support proposal 55

Dear Chairman Morisky and Board of Fisheries members,

I have been commercial fishing for sac roe herring in the Kodiak area for over 20 years. In the past this fishery was an important part of my yearly fishing operation. Recently, I have not participated in this fishery because the marketable size fish have been spawning prior to the opening date. Over time a greater part of the spawning biomass of herring in the Kodiak area have been arriving to spawn prior to the April 15 opening date. By giving the department the ability to move the opening date forward or emergency order authority to open the fishery, these marketable, older age class fish could be harvested. I respectfully request that the Board support proposal #55.

Sincerely,

Robert Fellows



RE: PROPOSAL 44 Amend the Kamishak Bay District Herring Management Plan to remove restrictions to the Shelikof Strait food and bait herring fishery

Please oppose the proposal. This would allow a fishery on a stock that is in recovery and with little regard for a potentially different biomass.



J6: PROPOSAL 44 Amend the Kamishak Bay District Herring Management Plan to remove restrictions to the Shelikof Strait food and bait herring fishery

Name Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

Organization - Cook Inlet Seiners Association

Email Address - cookinletseiners@gmail.com

Position - Oppose

Comment

The herring in Kamishak bay have been known to spend winters in upper Shelikof strait. The Kamishak bay herring fishery has not been opened recently due to low abundance. Allowing fishing on these stocks could hamper the recovery of this already diminished stock.

Sincerely

Cook Inlet Seiners Association



RE: PROPOSAL 283 Modify the Aleutian Islands Subdistrict Pacific cod state-waters season dates to open the fishery west of 170° W long for Pacific cod

Mr. Chairman, Members of the board, My name is Steve Beard and I operate the Golden Pisces, a 98 foot trawler that has participated in the BSAI state cod fishery since its inception in 2006 excluding a few years when there was no available market. This fishery is part of our winter fishing plan and we've invested heavily in the necessary gear and become quite dependent on it. Regardless of our length we are bound to the 150,000 lb. daily limit like all participants. It's very important to understand that we cannot compete with pot vessels in February, we don't use bait and the fish don't school up inside three miles until the first week of March. I've spent several partial February's in the Aleutians with little or no production and now we don't even attempt it till March first. RC-050 states that 20 trawlers have participated in the fishery over the years and that's probably correct, in 2019 there were 4 trawlers, only 2 over sixty foot. There really isn't that much interest in this hit and miss fishery as most trawlers are harvesting their pollack in February and March. I strongly oppose proposal 283 and ask you to consider as history as you study this proposal that would remove us from the fishery as more than likely the season will be closed by mid March. I see no benefit to the community of Adak by changing our start date to March 15th and I would think Golden Harvest Seafoods would welcome trawl caught cod for a steadier offload flow. A March first start date would be more reasonable, thank you, Steve Beard, Captain, F/V Golden Pisces, 12/26/2019



Dear Mr Chairman and Board Members,

My Name is Abby Duffy and I am writing as a representative of the F/V Miss Leona, a vessel on which I am also a crew member. The Miss Leona is an 86 foot trawler which is only 22 foot wide with a very low profile. She is dwarfed by some of the Super8 fishing vessels, making her a relatively small vessel caught in the bureaucratic category of large vessels. The Miss Leona is an owner/operator vessel which has, at times, up to 3 generations of family working side by side on the vessel: Omar Allinson, owner and semi-retired captain; son, Chris Allinson, Captain; and grandson Kameron Allinson, who at 20 years old, and deckhand since the age of 15, is eager to follow in the family traditions. The vessel has fished in Alaska since 1974, has a year round slip in Kodiak, and does most maintenance and repair work in Kodiak and Dutch Harbor.

The Miss Leona is a fishing vessel that is dependent on cod and supportive of the shoreside community of Adak. Since the inception of the fishery in 2006, the vessel has fished in the Aleutian Islands whenever a land based cannery has been available to which to deliver fish. The only exception to this was in 2019, when the vessel missed the winter and spring cod fishing due to repair work needed as a result of a rogue wave (repair work which was done in Dutch Harbor). The Miss Leona, by way of fishing in the Aleutian Islands and delivering only to shoreside canneries in Adak, has been supporting the community of Adak. The vessel has further committed to supporting both itself and the Adak community by investing heavily in gear specific to Aleutian Islands fishing.

Early March is a very important time in the Aleutian Islands cod fishery for trawlers to be on the grounds. It is well known by those fishing in the Aleutian Islands that the cod do not aggregate until the first weeks in March. As a fishing plan and a conservation tactic, trawlers also know that fishing prior to aggregation is not desirable as it causes unnecessary expenses, wear and tear on gear, and perhaps most importantly, can result in unnecessary bycatch. Setting the start date of the fishery to March 15th will cause the Miss Leona to miss those important early weeks in March and has the potential to cause the fleet to miss the entire season if all quota is caught by the under 60 foot fleet prior to March 15th. Since fixed gear can draw the fish using bait and are not dependent on timing their fishery with the natural cycles of the fish. As such, the under 60 foot fleet has ample time to fish, prior to aggregation, without the perceived competition of the over 60 foot trawl fleet.

Important to note, the vessels targeted to be delayed in their fishing activities by this motion, i.e. the over 60 foot trawl fleet, are not anymore of a competition to the under 60 foot fleet than the under 60 foot boats are to each other. All vessels, regardless of length are limited to a 150,000 lb trip catch limit. Given that the state waters are open access, in effect, there is no difference between adding in the few over 60 foot vessels or adding in a few more under 60 foot vessels. Important to note, also, is that trawlers under 60 foot are included in the regulations pertaining to the under 60 foot fleet. Taken together, this shows that the motion is neither addressing issues of catch capacity nor gear type, but rather simply of boat size.



The Miss Leona is sympathetic to aims of the Board of Fish in attempting to support the self made fishermen by supporting the under 60 foot fleet. Being a family run, owner operated vessel, which supports local communities, the Miss Leona exhibits exactly those characteristics that the Board of Fish is trying to support in the under 60 foot fleet. By opting for this motion, the Board will have a direct negative impact on the fishing plan of the Miss Leona, and thus will have a direct negative impact on the survivability of the three generation, family-run, owner operator vessel, on the family that works the vessel, and on the dedicated crew employed by the vessel.

Thank you for considering these points and for considering the wellbeing of all crews and captains of the Aleutian Islands cod fishery in making your final decision.

Sincerely,

Abigail Duffy



RC0050

Submitted by Adak Community Development Corporation 12/12/2019

Request for a Board Generated Proposal for consideration at the January Kodiak meeting

The Problem

The AI GHL fishery opens January 1st in the Adak Section (175 to 178 – “the box”) to vessels <60’. The GHL fishery in all AI state waters has begun either on March 15th or four days following the closure of the BSAI trawl fishery (which has generally occurred in the month of March).

In 2019 all AI statewaters opened March 15th. Upon the date of the all AI statewaters opening, the 60’ size limit expires and is replaced by a <125’ pot vessel limit and <100’ trawl vessel limit in all AI statewaters.

It is projected that the BSAI A season closure will likely occur by sometime in the 1st week of February. This will result in the loss of approximately one month of priority access for <60’ cod vessels.

There are at least 20 CV trawl vessels >60’ and <100’ that have participated in the AI cod GHL fishery at some point in the past and many more that could. There are at least 100 pot vessels >60’ and <125’ that could participate.

As a result the <60’ vessels will be forced to race against vessels up to twice their size, creating safety concerns. Early entry by >60’ vessels will compress the season into a dangerous, wasteful derby which undermines the ability to maximize product value, while contributing to the destabilization of AI communities.

The solution(s)

Our preferred solution would be for the Board of Fish to recommend to the ADFG Commissioner to use the authority in 5 AAC 28.647.(e) to set a fixed start date in 5 AAC 28.647.(c) of no earlier than March 15th for the GHL cod fishery in all AI statewaters.

- (e) The commissioner may open and close, by emergency order, fishing seasons at times other than those specified in this section if the commissioner determines it is necessary to
- (1) adapt to unanticipated openings and closures of federal seasons;
 - (2) provide for maximum fishing opportunity;
 - (3) maintain sustained yield management; or
 - (4) provide for orderly fisheries.

An alternate process for achieving our preferred solution in a timely manner for the 2020 A season, would be for the Board to generate a proposal, scheduled for action at the January meeting in Kodiak, to set a fixed start date in 5 AAC 28.647.(c) of no earlier than March 15th for the GHL cod fishery in all AI statewaters.

Motion Language for Board Generated Proposal to modify 5 AAC 28.647.(c) start date.

(Based on RC 50 Submitted by Adak Community Development Corporation 12/12/2019)

“Move that the Board generate a proposal for consideration at the Kodiak meeting (January 11-14, 2020). The proposal is to modify the start date of the AIS state-water cod fishery in paragraph (c)(2) of 5 AAC 28.647, by striking the bracketed text and inserting the underlined bold text, as shown below:”

(c) The commissioner shall open and close, by emergency order, a state-waters season in the Aleutian Islands Subdistrict as follows:

(1) the Adak Section shall open January 1;

(2) all waters of the Aleutian Islands Subdistrict shall open as follows:

~~[(A) four days after the Bering Sea and Aleutian Islands parallel "A" season for the catcher-vessel trawl fishery is closed or four days after the federal Aleutian Islands Subarea non-CDQ season is closed, whichever is earlier; or (B) if the state-waters season has not opened under (A) of this paragraph by]~~
on or before March 14, the commissioner will close, by emergency order, the parallel "A" season for the catcher-vessel trawl fishery ~~[at 12:00 noon March 14]~~ and open, by emergency order, the state-waters season at 12:00 noon March 15;

(3) the commissioner shall close, by emergency order, the state-waters season when the guideline harvest level is taken or on December 31, whichever occurs first; except as otherwise specified in this chapter, all parallel Pacific cod seasons are closed during the state-waters season.



Adak Community Development Corporation

December 26th, 2019

ADF&G Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Re: Proposal 283

Dear Chairman Morisky,

ACDC requests that the Board approve Proposal 283. We also request the Board to make a finding that the change in the regulation needs to be implemented by emergency action.

The AI GHL fishery opens January 1st only in the Adak Section (175 to 178 - "the box") and only to vessels <60'. The GHL fishery in all AI state waters has begun either on March 15th or four days following the closure of the BSAI trawl fishery (which has generally occurred in the month of March).

In 2019 all AI state-waters opened March 15th. Upon the date of the all AI state-waters opening, the 60' size limit in the 175-178 "box" expires and is replaced by a <125' pot vessel limit and a <100' trawl vessel limit, which then applies in all AI state-waters for the remainder of the AI GHL fishery

The Problem:

It is projected that the BSAI A season closure will likely occur by sometime in the 1st week of February. Without a change in the regulations to a fixed trigger date of March 15 or later, this will result in the loss of approximately one month of priority access for <60' cod vessels in the AI state-water cod fishery.

There are 67 trawl vessels between 60' and 124' that have a federal pot cod endorsement in at least one federal management area that could participate once the size limit is lifted

There are 72 vessels between 60' and 99' that have a federal trawl permits in at least one federal management area that could participate once the size limit is lifted. Of these, 28 are AFA derived permits.

(Data sorted from: [https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#license-limitation-program-\(llp\)](https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#license-limitation-program-(llp)) and cross referenced for Length Overall at <https://www.cfec.state.ak.us/plook/#downloads>)



Combined, that is a potential of 139 additional federally permitted over 60' vessels that would be eligible to enter the AI GHL fishery when the size limit is lifted. These larger vessels are not allowed in any other GHL cod fishery (and so they won't be constrained by the exclusive registration provision.)

The AI has a 150,000 lb trip limit. In 2019 the AI GHL fishery had 14 pot boats (6 of which also fished the Dutch Harbor GHL) and 4 trawlers for 155 landings for an average of 8.6 trips per boat of about 100,000 lbs.

The 15,000,000 lb AI GHL divided by the trip limit equates to 100 trips, or 150 trips at the 100,000 lb average delivery. If 10% of the 139 eligible larger vessels entered the fishery in early February it would likely cut the trips per boat by over a third. If 20% entered in early February it could cut the average to 4 trips.

In 2008 22 trawlers entered the AI GHL fishery (tables 278.1&2 -RC2, Dec. 2019). The GHL 7.5 million lb A season fishery lasted just one week. With the projected early closures of the federal BSAI CV trawl and >60 pot cod fisheries, we are likely to see a similar influx in 2020.

As a result the <60' will be forced to race against vessels up to twice their size, creating safety concerns. Early entry by >60' vessels will compress the season into a dangerous, wasteful derby, which undermines the ability to maximize product value, while contributing to the destabilization of AI communities.

The proposed action will ease the continued erosion of opportunity for Aleutian Islands fishermen and Aleutian communities dependent on shorebased processing. An influx of larger boats early in the season creates a race for fish which results in an overcapitalized, inefficient, and unsafe fishery which reduces the value that can be obtained from the GHL. Without stability, the only active shorebased processor in the region, and the community which is dependent upon it, are in jeopardy.

Thank you for considering our comments.

Sincerely,

Rick Koso, President

ACDC

PO Box 1943, Adak, AK 99546



RE: PROPOSAL 283 Modify the Aleutian Islands Subdistrict Pacific cod state-waters season dates to open the fishery west of 170° W long for Pacific cod

Dear Chairmen Morisky and members of the Board, As a participant of the AI GHF I support the board making a set trigger date for the AI state waters to open for larger vessels. In the past we have started fishing when the AI state waters opens January 1st for under 60' vessels in the 175 to 178 box. It opens March 15th or four days after the closure of the BSAI trawl fishery. With the projected closing date for the BSAI A season being as earlier as the first week of February we would roughly lose a month of fishing time for the <60 sector. Without having a set date for the AI state waters to open and eliminate the <60 length limit we will be racing against vessels much larger than us and creating a unnecessary derby for fish. Also creating this set date will help the Aleutian communities stability, and the stability of fishermen who have committed to the AI state waters fishery. Thank you for considering my comments. Garrett Kavanaugh



RE: PROPOSAL 283 Modify the Aleutian Islands Subdistrict Pacific cod state-waters season dates to open the fishery west of 170° W long for Pacific cod

I support this Board generated proposal as a means to protect the small boat fleets.



RE: PROPOSAL 283 Modify the Aleutian Islands Subdistrict Pacific cod state-waters season dates to open the fishery west of 170° W long for Pacific cod

My name is Ron Kavanaugh, Kodiak Resident since 1966. Engaged in Alaskan Fisheries since 1975, our family is 100% dependent on commercial fisheries in the State of Alaska. I own & operate the 58 ft FV Insatiable and 58ft FV Sylvia Star. I started working on my granddad's boat at the age of 12, then crewed at a setnet site on Kodiak's westside. I moved on to working the deck on salmon boats until I was able to lease a small seiner for the '82 salmon season. Two crucial state-wide events happened that lead me to participating in the federal grey cod fishery in the Gulf of Alaska and BSAI. The Exxon Valdez oil spill-which created an economic down turn for wild salmon and implementation of halibut and black cod IFQs- this took away a critical tool for diversification and were the main systemic changes that lead to this move. We were one of the first boats to fish in the Bering Sea under 60ft federal cod fishery and have pot fished since the inception of the state managed P-Cod fishery. This fishery enabled our local family run business to remain economically sound and provide year round jobs for our crewmembers. Our vessel, family, and crew are dependent on a well-managed and fully executed state water P-cod fishery. I am a proponent of low impact state water fisheries that provide access to the resource and believe the State of Alaska has an obligation to manage it's resources within the 3 mile boundary. Today, I want to address the critical oversight that proposal 283 seeks to address. In December 2019, the NPFMC took no action that would provide relief from the vacation of Amendment 113. Amendment 113 insured that 5000 mt of cod would be caught and processed on shore in the Aleutian Islands. With that rule gone, the 5,000 mt tons can now be caught and processed anywhere in the BSAI. We anticipate that the federal season will be prosecuted quickly and end in the first few weeks of February. In statute the trigger for boats over 60 pot AND trawl fleets is 4 days after the federal closure or March 15th. Due to the loss of A113's 5,000 mt tons and an early federal closure, the state waters under 60 fleet would see sever loss of harvest opportunity and a extremely compressed season. Last year the season closed less than two days after the over 60 fleet entering the fishery. If applied to the anticipated timing this year the AI state waters fishery would close 30-40 days sooner. This leads to quality, safety, and economic difficulties for the communities and harvesters. Because of the timeliness of this issue, implementation needs to be immediate and we understand may need Emergency Order authority to be provided to the Commissioner. Ron Kavanaugh
1533 Sawmill Circle Kodiak Alaska 99615



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

I appose this proposition because i believe that the current management plan is strong and the reasons for this proposal are not based on the reality of what is going on. My name is Aaron Nevin. Being born in Kodiak to a commercial fisherman father I grew up fishing salmon on his seiner. I have continued on in my currently twenty year long career to buy a permit and run his boat after retirement. The seining season usually accounts for the majority of my annual income and is incredibly important to my family.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

Adam Barker 41584 Manson Dr. Homer AK 99603 December 26th 2019 Chairman Reed Morisky Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 Re: Prop 58 Dear Chairman Morisky and Board of Fish members: My name is Adam Barker, I'm a third generation fisherman who has been fishing in Kodiak waters with my father starting in 1988, I now support my family by salmon seining, and tanner crabbing. My children are learning how to fish with me now too, this is very important to me. I have been an owner operator participating in the salmon fishery since 1999. I respectfully request the board reject proposal # 58. Prior to this fishery area opening Chignik must have received their escapement, the fishery has been managed carefully for 40 years. In the past 10 years we have only fished the Cape Igvak section prior to July 8th a couple times. Why now should the management rules be changed? Who is actually benefiting? The current management plan is already set up to protect Chignik when they have a poor salmon showing. Please reject prop # 58 as it is a redundant and biased proposal, thank you for the opportunity to comment. I hope the Board continues to apply consistency in its application of the guiding policies such as the mixed stock fisheries policy, and the sustainable fisheries policy. Sincerely, Adam Barker



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

Dear Board of Fish Members, I am a second-generation Kodiak fisherman. My father started salmon fishing here in 1967, and I have setnetted since I was a toddler with my family, for my whole life. I took over the permit from my dad several years ago, and in 2016 finally bought the setnet operation from my parents outright. You may be wondering why a setnetter who has no ability to fish the Igvak area is even commenting on this proposal. This is because we are drastically affected by the mobile seine fleet. If they are limited in where they can fish, we find our central section of the Northwest Kodiak district becoming more and more crowded with fewer opportunities for all to harvest in the traditional manner. So it behooves me to pay attention and understand what's going on. And what study brings up on this issue is that it is actually not based on parity but trying to change allocation. We feel very badly for our Chignik neighbors who have had such complete disastrous seasons, but it must be understood cape Igvak never even opens at all in the bad years, so Kodiak fishermen can't be blamed for taking all their fish. As a lifelong fisherman with a previous generation of history in my consciousness, I have to add that climate change and the warming of the oceans and ocean acidification is something we are coming up against. Changes are happening and I feel like they are going to keep happening. For this reason I urge you to be very cautious and careful about changing management plans in response to fisheries "disasters." Who knows what disasters will happen next and if you build management plans in response to these rather than based on deep analysis of science and the history and all other elements of the proposal, you'll be setting dangerous precedents for your future decisions. Thank you for your consideration, Adelia Myrick



December 24, 2019

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

Re: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fisheries Members,

I am Alex Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Wandering Star. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject this proposal and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
Alex and Jaime Roth
F/V Wandering Star
Homer, Alaska



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

Bo Calhoun 57177 Zulu Ct. Homer, AK 99603 12/26/19 RE: Opposition to Proposal #58 Dear Chairman Morisky and Board of Fish members: I'm a third generation Kodiak salmon seiner. I was born and raised in Homer, AK and continue to live here. My wife and I hope to raise our two sons on our family seine boat in a healthy Kodiak salmon fishery. I respectfully request the Board reject Proposal #58. The purpose of the Cape Igvak Management Plan is to limit the traditional Cape Igvak fishery by Kodiak fishers. It has successfully functioned to restrict our fishing there by not allowing an early run opener in four of the last six seasons. Kodiak fishers are only allowed to fish when the Chignik run is strong, and have on average caught significantly less than the 15% catch the Management Plan allocates. If the Chignik sockeye run is weak, Kodiak fishers do not get time in Igvak. If the Chignik sockeye run is strong, Kodiak fishers should be allowed to access this traditional fishery. The current management plan is working as intended. This proposal simply seeks to shift traditional allocation from Kodiak to Chignik. Please reject Proposal 58. Thank you for taking the time to read all public comments. Sincerely, Bo Calhoun



December 26th 2019

Dear Chairman Morisky and Board of Fish members:

My Grandfather fished a salmon trap in the 1920s. In the 1950s my family started salmon seining out of Kodiak, Alaska. Prior to statehood they fished the mainland all the way down to Chignik. In 1973 there was four Bowhay boats fishing and in 1978 I was the first of my family to have to pay for the right to fish. In 1983 I had the opportunity to fish a medical transfer permit in Chignik so I am familiar with the fishery. I have 47 years on the water and commercial fishing has been my only livelihood for those 47 years. My father was a biologist who worked for the Washington State Game department, my younger brother received a master's degree in fisheries management from University of Washington and my older brother earned a degree in Environmental Science at Washington State University. After a brief time college I decided to make commercial fishing my vocation.

I am a strong believer that the dedicated people at the Alaska Department Fish and Game in all regions, keep the health of the resource at the forefront, without bias. It seems to me, as new fishermen become involved in the salmon fisheries along with the advancement of technology (bigger boats, larger seine blocks, jet/power skiffs, etc) and the ability to make more sets a day, that the cyclical nature of salmon stocks do not, on a yearly basis support financially these larger operations. Being a small boat operator, there is always someone setting in front of me and this is just the nature of the 'beast'. But is has nothing to do with the management plan put into place for the Kodiak and Chignik salmon fisheries. It was a tool supported by science to maintain sustainable salmon stocks for both areas for the long run. I have addressed this similar allocation issue for years and certainly believe that we come back to it because of profit distribution, not stock health.

I strongly urge the Alaska Board of Fish to reject Proposal 58 for the reasons restated below:

1. Kodiak fishermen have a long history fishing Cape Igvak prior July 8th.
2. The science isn't biased towards one district or another.
3. The proposal supports economic gain for a few and not sustainable salmon runs for all.

Sincerely,
Bob Bowhay
F/V Moondance
P.O. Box 187
Kodiak Alaska 99615
907-486-4594



Brad Marden
PO Box 2856
Homer, AK 99603

December 23, 2019

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

RE: opposition to Proposal 58

Dear Chairman Morisky and Board of Fish members:

I first participated in the Kodiak seine fishery for salmon in 2004. Since then, I've worked as a deckhand in various salmon, halibut, and herring fisheries throughout the state, before buying my own boat in 2012, followed by a Kodiak seine permit in 2013. Since then I have exclusively fished in Kodiak waters. I respectfully request the Board **reject Proposal 58**.

Proposals to reduce the Cape Igvak allocation are a perennial request at the Kodiak and Chignik finfish meetings, and have been consistently rejected by the board in the past, for good reason. The allocation of 15% of overall Chignik bound fish is based on a historical use of the regional salmon resource from before limited entry, and the most important part of this allocation can come in June during Chignik's early run. When Chignik salmon escapement is weak, Kodiak fishermen do not get any fishing opportunity at Cape Igvak- this is fair; it also seems fair that in years of Chignik salmon abundance Kodiak fishermen should get a chance to catch the historical allocation. The Cape Igvak fishery helps spread out our fleet and can be a critical part of making any money in June as a Kodiak seiner.

I am sure that the Board tires of endless testimony claiming that the fish of concern are "our fish being stolen by those guys over there". It seems that in my 15 years of commercial fishing in Alaskan waters, Kodiak salmon fishermen are often on the defensive. Rather than retaliate with countering proposals (ie, asking for mandatory June openers for Cape Igvak district), I ask that we maintain status quo and keep historical allocations and fishing opportunity at Cape Igvak. For this reason, I ask that you **reject Proposal 58**. I want to thank you for your service and I hope the Board continues to apply consistency in upholding Mixed Stock Fisheries Policy, and the Sustainable Fisheries Policy.

Sincerely,

Brad Marden



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

My name is Brian Mcwethy. I was born and raised in Kodiak. I live in Kodiak with my family and we all depend on my income. I fished with my father on his seiner growing up and now I own and operate a seiner. Salmon seining and Tanner crab fishing in Kodiak are currently our only sources of income. I plan to try and continue to fish the Kodiak waters and possibly my children will have the opportunity to. I hope the current and historical areas we fish aren't taken from us and the future generations of Kodiak. I strongly oppose any change to our historical fishing areas!



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

I'm opposed to this because it has been a traditional fishery in June for Kodiak seiners. Sockeye catches in June have been dwindling and Kodiak seiners need the opportunity to fish there to maintain a viable fishery in June.



December 22, 2019

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

Re: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and live here year-round with my wife.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to the limited entry program in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off the existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before any fishing at Igvak occurs. This threshold was put in place to prevent Kodiak fishermen from ever creating conservation issues during weak runs to Chignik. This is contrary to what Chignik fishermen appear to think - that they were being nice by "letting" Kodiak fishermen fish there during a time of weak Kodiak runs. This is not about Kodiak being greedy or cruel to Chignik fishermen. It is about protecting and maintaining our regional fishery, which includes Cape Igvak. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

The takeaway that deflates the proposal's arguments is that if it's a bad Chignik year, the plan in place means that Kodiak fishermen won't fish at Igvak.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

The current management plan stipulates that 300,000 sockeye must be harvested in Chignik before Igvak is opened. That plan provides that Chignik must be getting a strong run of sockeye before Kodiak fishermen have an opportunity to try fish the Igvak area. Sometimes fish arrive early and sometimes fish arrive late, but the plan provides for Chignik first and if Chignik has 300,000 sockeye harvested then the Kodiak management plan should not depend on whether the date is pre- or post- July 8th.



December 22, 2019

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

Re: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

This proposal aiming to change the start date for Kodiak's Cape Igvak fishery is a reallocation of a traditional fishery without justification. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery can in no way be described as a "new and expanding" fishery. This proposal is simply a grab at fish and an effort that Chignik fishermen repeatedly put forward as an attack on Kodiak. Our salmon fishermen continually have to defend against outside attacks to maintain our way of life and the energy spent each cycle to address extremely similar, if not identical proposals, is frustrating at best and a waste of the Board's time at worst.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to the limited entry program in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off the existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before any fishing at Igvak occurs. This threshold was put in place to prevent Kodiak fishermen from ever creating conservation issues during weak runs to Chignik. This is contrary to what Chignik fishermen appear to think - that they were being nice by letting Kodiak fishermen fish there during a time of weak Kodiak runs. This is not about Kodiak being greedy or cruel to Chignik fishermen. It is about protecting and maintaining our regional fishery, which includes Cape Igvak. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

The takeaway that deflates the proposal's arguments is that if it's a bad Chignik year, the plan in place means that Kodiak fishermen won't fish at Igvak.



The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem relatively on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926. Chignik fishermen also enjoy shorter seasons compared to Kodiak fishermen in addition to substantially higher average permit values. I hear Chignik fishermen who are vocal about stressed seasons and difficulties remaining living in their communities, and I truly sympathize with those concerns because Kodiak fishermen feel very similar. I would prefer to seek Chignik and Kodiak fishermen as allies and friends because we seem to share the same cultural values around teaching kids to fish, learning work ethic on boats, and enjoying the camaraderie and tight-knit community ties that form within the fishing lifestyle. I wish that they would stop submitting proposals seeking to harm Kodiak fishermen; we're just trying to maintain our regional fishing heritage.

Rural villages in the Kodiak Archipelago are struggling and protecting our region's traditional and historic salmon fishery is of utmost importance to prevent further negative impacts on these communities. Small boat harbors are emptying. Communities are depopulating and facing social problems. Schools are closing. For the Alutiiq peoples whose culture and economy has been built around fishing for 7,500 years this recent fisheries dispossession is especially egregious. Within one generation, there's been a:

- 75% decrease in families fishing
- 70% decrease in individual halibut IFQ holdings
- 100% decrease in individual sablefish IFQ holdings
- 85% decrease in the number of young people owning state fishing permits
- 70% decrease in the number of state fishing permits overall



Fig.1 Alaska limited entry permit holders in Kodiak Archipelago communities, 1975-2016. Communities include Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie, and Port Lions. Data: CFEC.



Please do not accept proposals from Chignik seeking to hack away at Kodiak's salmon fishery. I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes to the Cape Igvak management plan and thus create ripple effects negatively impacting Kodiak fishermen, processing workers, and community businesses. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

While it is unfortunate that Chignik runs are at low cycle, this proposal is does nothing to alleviate shortages of Chignik sockeye. Igvak does not open to fishing until 300,000 sockeye have been harvested in Chignik. Conservation concerns are already addressed by the current Cape Igvak management Plan. This is a knee jerk reaction to shortages that are not caused or exacerbated by Cape Igvak openings. Such a change would however be unnecessarily punitive to Kodiak seiners.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

The management plan already in place has worked since 1978. During years with surplus salmon Kodiak fisherman get openings. During years of low production the area doesn't open.



Fred Stager

F/V Lady Lu

December 12, 2019

Alaska Board of Fisheries Board Support Section

P.O. Box 115526 Juneau, AK 99811-5526

RE: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fish Members,

I am writing to oppose Proposal 58: The proposal intends to entirely eliminate the Cape Igvak fishery in June while sustaining the 15% allocation of Chignik bound sockeye in the Cape Igvak area along with other sustainability and allocation thresholds that are currently in place. The outcome of the proposal would be to focus the harvest of Chignik bound fish entirely on the second run in July while discontinuing the longstanding traditional harvest of early run Chignik bound sockeye in June.

Not only is this proposal an allocation grab purporting to solve a problem that doesn't exist. But it has tremendous potential to increase the Kodiak interception of sockeye salmon bound for Cook Inlet.

The Cape Igvak management plan was first adopted in 1978 and has been repeatedly evaluated by the Alaska Board of Fisheries, making it one of the most long-standing and intensely scrutinized management plans in the state. This plan has stood the test of time and provided a reasonable allocation and harvest strategy for a fishery that stretches back well beyond the beginning of limited entry.



In years of abundance, Kodiak seiners are allowed to share in the harvest of Chignik bound sockeye, while in poor years the harvests are decreased or eliminated altogether. It is a sound plan that has stood the test of time and has provided the Kodiak fleet with a much needed source of June revenue.

I'm also frustrated in the unfairness in the how the shared resource is currently managed. Chignik fishermen are prosecuting an expanding mixed stock fishery on non-local stocks (see WASSIP), yet their fishing efforts have no restrictions that account for the impact that their harvest has on Kodiak's fishery. Meanwhile, Kodiak fishermen have endured 2 consecutive years of closures in the Cape Igvak for conservation.

I ask the board to **reject proposal 58**, it is an allocative grab without merit.

Thank You- Fred Stager



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

Dear Chairman and Members of the Board, As a young fishermen who is working their way into the Kodiak Salmon fishery this proposal will cause Kodiak fishermen to lose a substantial amount of their catch. I have been investing into the Kodiak salmon fishery as much as possible, in 2019 I purchased a Kodiak salmon permit. I ran a seiner for the month of august. I plan on running the same boat for the entire 2020 salmon season in Kodiak. When I was younger I remember testifying against proposals similar to these. These proposals are re-allocations of Kodiak historical catch. Kodiak has always had intercept fisheries and we already have management plans in place that have been effective for the Kodiak salmon fishery. Please help ensure the future for young fishermen entering into the Kodiak Salmon fishery, and the people who have been investing and are established in the fishery. Thank you for considering these comments, Garrett Kavanaugh



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

Dear Chairman Morisky and Board of Fish members: I am 31 years old and a life long resident of Kodiak. I grew up set netting in Uganik on the west side of the island with my mother until i was 14. I then started seining with my father until I was able to buy my own Kodiak seine operational the age of 27. I request that you oppose proposal 58. this proposal is a grab for fish under the guise of conservation. we don't even get to fish the Igvak section until after chignik catches 300,000 sockeye. please allow us to continue our historic fishery. thank you for your time. sincerely Iver Holm



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

I have been intimately involved in the Kodiak seine fishery since 1968 to present. Presently my son is fishing the Kodiak area and it is my desire to have my grandsons be able to participate in a healthy Kodiak fishery if they so desire. Throughout my career I have come to the conclusion that the ADF&G management for Kodiak has been stellar and has kept the stocks in Kodiak healthy overall with the current management plan. The current management plan disallows fishing time in the Cape Igvak section when chignik runs are weak, but still allows kodiak fishers access to their traditional fishery when runs are more robust. C. Igvak has been closed 4 out the last 6 years. Alaska boats and permits asking value is \$40,000 for Kodiak permits and Chignik permits are \$100,000. I believe Kodiak fishers deserve access to their traditional fishery under the present management plan. I oppose proposal 58.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

My name is Jamin Hall, my wife and I have a set net site in Uganik Bay. I am writing in opposition to proposal 58.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

My name is Ken Christiansen. I have seined in Kodiak for more than fifty years, beginning with my father at the age of 6 and now with both my son and daughter. As a captain, for the past 40 years, I have fished the whole Kodiak Management Area. Any change to a management plan should be based on scientific reason. Outcry from one user group to take from another is simply a knee-jerk reaction with a sense of immediate gratification but not necessarily improved results. The recent run failures in the Chignik area may be related to climate change, past overfishing, poor spawning conditions, poor brood stock survival conditions, or other as of yet unknown reasons. Cape Igvak is a traditional fishery for Kodiak Fisherman, Thorvold Olsen, Billie Berestoff, Alfred Torsen, Marius Olsen, and Antril Suydam, to name a few, dating back to the 1960's, when boats were constructed of wood and were much smaller than the 58" limit seiners of today; and prior to the Cape Igvak Management plan. Further, the Management Plans in place already restrict Kodiak Fishermen until the escapement goals in Chignik have been met. Additional restriction of Kodiak fisherman does not guarantee that weather, currents, tides, and ocean conditions will cooperate to provide the ideal returns for Chignik fishermen



Kodiak Salmon Work Group
c/o Kodiak Regional Aquaculture Association
104 Center Ave., Suite 205
Kodiak, Alaska 99615

December 27, 2019

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

RE: CAPE IGVAK MANAGEMENT PLAN
Chignik Proposals 58, 59, 60, 61, 62

Dear Chairman Morisky and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created to address the issues of Cook Inlet bound sockeye captured in the Kodiak Management Area and the continuation of the Cape Igvak Management Plan. Membership is open and encompasses seiners from both Kodiak seine organizations, setnetters from both Kodiak setnet organizations, beach seine permit holders and processors. In other words, all of Kodiak's salmon fishing community. The group is supported by voluntary stakeholder contributions including those from the City of Kodiak and the Kodiak Island Borough.

KSWG is herewith submitting several documents for the Board's review: 1. Structure and Function of the Kodiak Management Area Salmon Fisheries; 2. Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries; and 3. Economic Analysis of Proposals 58, 60,61 and 64. An informational map is attached as well.

Cape Igvak Management Plan (Proposals 58-62)

Chignik's four substantive proposals regarding the Cape Igvak management plan don't outright request that the Board set aside the plan. Instead they focus on provisional changes that would



gut Kodiak's Cape Igvak fishery. Proposal 58 with the date change would reduce, on average, Kodiak's fishery by 79%. Proposal 59 is an accounting change that would reduce the Cape Igvak fishery by about 20%. Proposal 60, like proposal 58, would reduce Kodiak's revenues by about 67% and proposal 61 comes in with a 69% reduction. The fifth proposal (Proposal 62) is a record-keeping proposal that is untenable.

The Cape Igvak Management Plan is embedded in the Mixed Stock Fisheries Policy: "Most mixed stock fisheries are long standing and have been scrutinized many times by past Boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation" (Allocation Criterion 2). Chignik's guaranteed catch allocation of 300,000 fish (early run) and 300,000 (late run) was a clear balancing in the original plan, favoring Chignik by providing an economic safety net. In addition, Kodiak would share the conservation burden in that the escapement would be assured before Kodiak would go fishing. On the other hand, if Chignik gets its escapement and minimum guaranteed catch, then Kodiak is allowed to harvest up to approximately what was historically caught in the fishery. This is a fairly balanced plan, if not already overbalanced to Chignik's advantage!

Also, the Board states in Allocation Criterion 3, "The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries." Why is stability important? Many salmon stakeholders make investments and commitments based on regulatory stability. If salmon management plans are subject to change with every Board cycle, fishery values (ex-vessel, permit and gear) will decrease as uncertainty increases, conservation may be compromised, and stakeholders will be encouraged to try to "get a better deal" at each successive Board meeting.

The history of the Cape Igvak Management Plan (Allocation Criterion 1) is of critical importance to understanding why it was developed and how it was balanced between stakeholders. Prior to the plan Kodiak could fish at Cape Igvak any day that the Chignik fleet fished. The "day for day" fishing caused area managers concern that Kodiak's fishing could impact a weaker "second run" to Chignik. Consequently, the catalyst for the Cape Igvak Management Plan was conservation of Chignik's runs. The plan balanced the conservation burden between the two



areas. The plan has been in place for 42 years and has had constant review over multiple Board cycles. Its durability establishes it as one of the marquee fishery management plans in the State of Alaska. Changing a plan of such long duration without significant “new information” or “new fishing patterns” or “stock of concern” assessments or anything other than a proposer’s feeling that something should be changed, compromises and undermines the Board’s standing as a fair and impartial deliberative body.

The functionality of the Cape Igvak Management Plan as a conservation plan is seen in the plan’s application over the past five years. Because of low Chignik escapements there was no Cape Igvak fishery during 3 seasons. Period! Kodiak cannot be held responsible for any of the current biological or economic issues in Chignik due to low Chignik sockeye returns. Kodiak did not fish at Cape Igvak.

The proposer’s assertion, under Allocation Criterion 4, that Kodiak’s salmon fishermen have more “alternative resources” is a false assertion. If this means that Kodiak has more salmon numerically or by species, then the Board must also recognize that Kodiak’s salmon are divided between approximately 180 active seine fishermen and approximately 150 setnet fishermen ---in contrast to about 75 active Chignik permits. Resource availability is reflected in individual gross earnings. Chignik permits, on average over time, continue to earn more than Kodiak fishermen and, consequently, their permits are worth more in the market. “Alternative resources” in this sense would mean that Kodiak had less “alternative resources” per active permit holder than Chignik.

If the “alternative resources” idea means that Kodiak has more “species” available than Chignik salmon fishermen, this too is false. Both Kodiak and Chignik fishermen have access to halibut and cod in their areas although the Federal cod season is now closed in both areas. Only two or three Kodiak salmon fishermen are involved in the Gulf of Alaska trawl fisheries --- a fishery that limits participation with high costs of entry. Both Chignik and Kodiak have historically had a Tanner crab season. While Kodiak currently has a very small Tanner crab quota, only a subset of the Kodiak salmon fleet (like the Chignik fleet) have limited entry permits for the Tanner crab fishery. The Kodiak herring fishery is essentially gone. Kodiak fishermen, especially those from



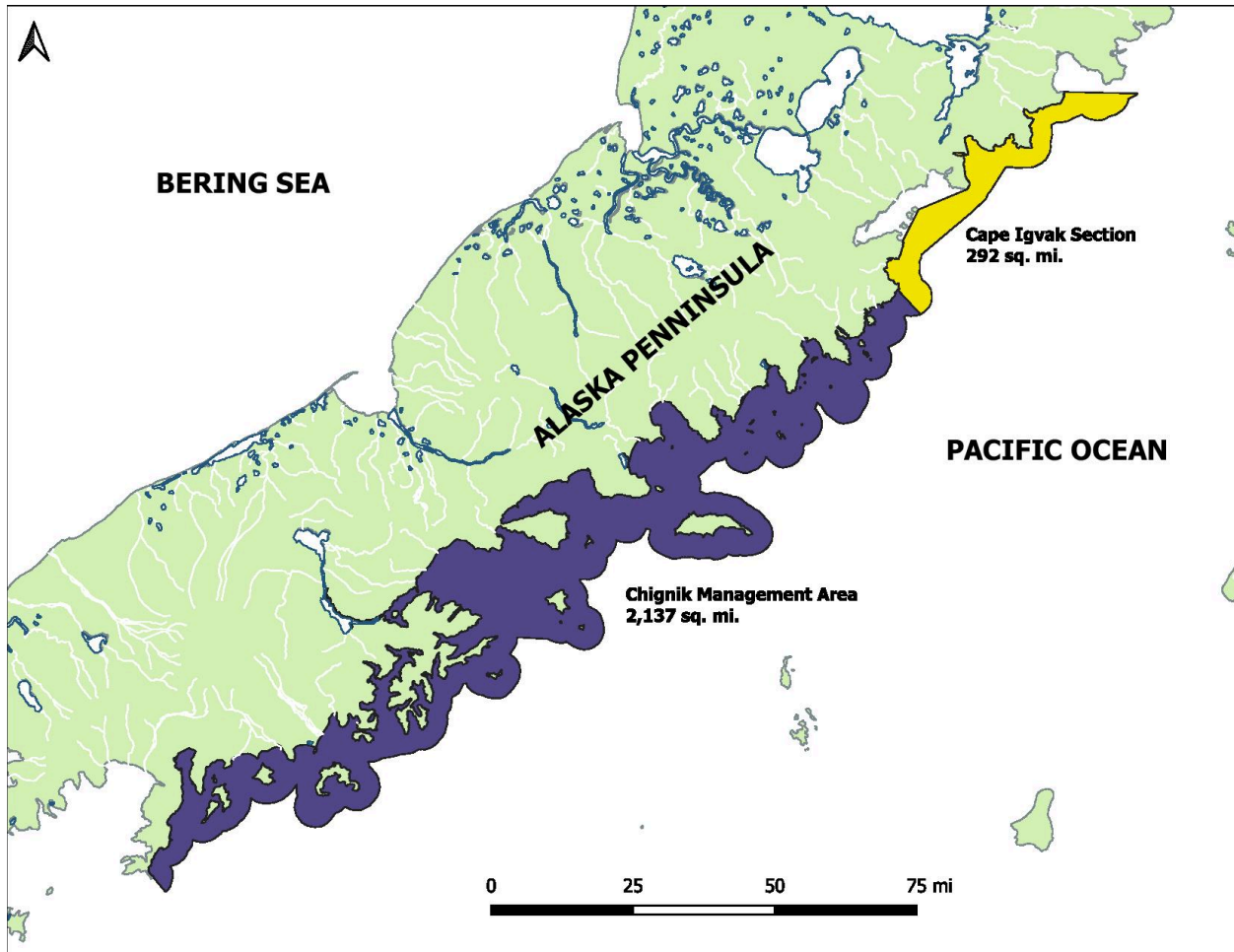
Old Harbor, Akhiok, Ouzinkie, Port Lions and Larsen Bay just don't see what "alternative resources" are available in Kodiak that Chignik doesn't have. All rural communities in the Gulf of Alaska under about 1,500 people are struggling to survive on their fisheries economy--- which is now almost exclusively salmon.

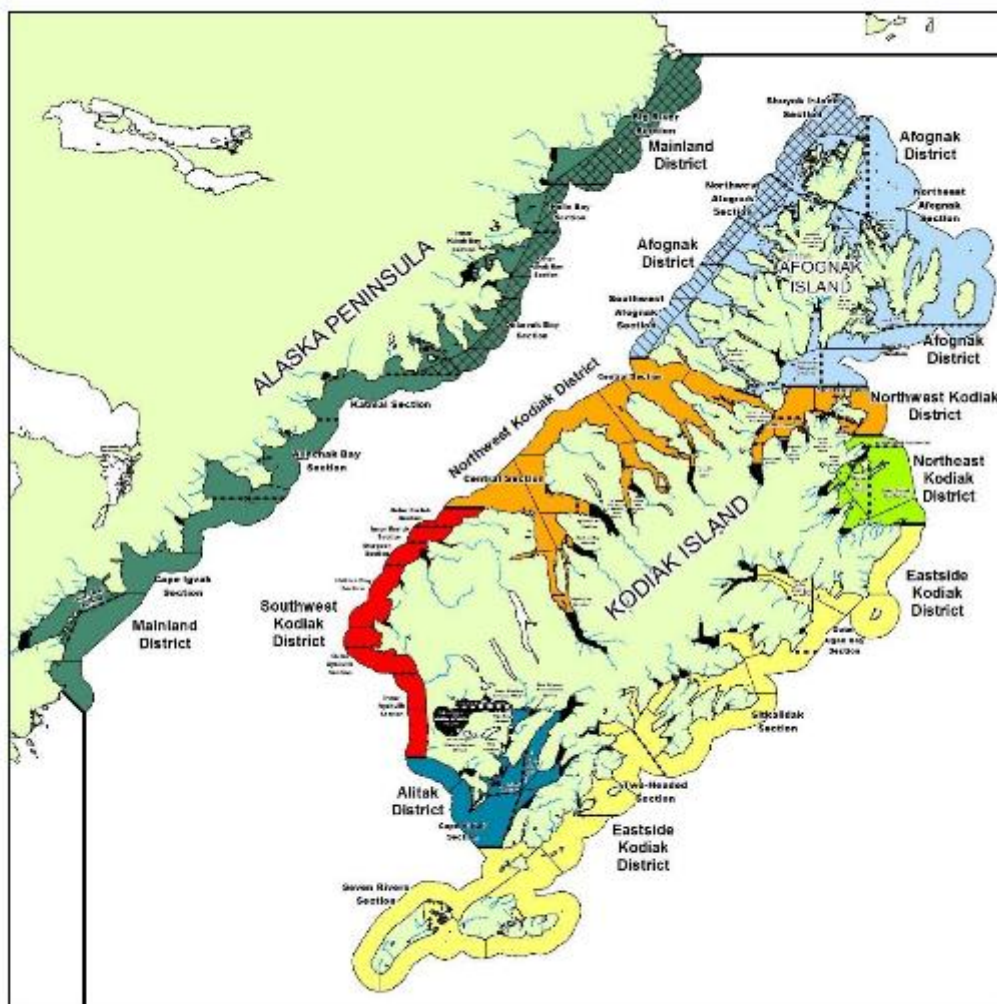
Finally, "The importance of the fishery to the economy of the region and the local area" (Allocation Criterion 7) favors Kodiak. The loss of the Cape Igvak fishery would cost Kodiak fishermen, on average, almost 4 million dollars. At best, the Igvak fishery would increase earnings by a subset of fishermen that actually live in Chignik or the Chignik region by less than an average of 12.0%. While not insignificant, the Igvak fishery is of reduced "importance to the economy of the Chignik region" when compared with the decline of active vessels and the number of Chignik fishermen that are now fishing in Kodiak and Prince William Sound. See further: Review of the Cape Igvak Management Plan and Proposals to the Alaska Board of Fisheries, Proposal 58 Economic Analysis, Proposal 60 Economic Analysis and Proposal 61 Economic Analysis.

In summary, it is the position of the Kodiak Salmon Work Group that the Board should vote NO on proposals 58, 59, 60, 61, 62 and 63. These proposals are not supported by the Board's allocation criteria and do not have a rational relationship to Chignik's conservation needs.

Very truly yours,

Duncan Fields, Chairman





Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries

Kodiak Salmon Working Group



Executive Summary

- The Cape Igvak Salmon Management Plan (CISMP) has been in place since 1978 and allocates 15% of total Chignik sockeye harvest to Cape Igvak (Kodiak Management Area) after Chignik is guaranteed 600,000 harvest from early and late runs combined, and escapement goals are projected to be met.
- Management strategies under CISMP have been very successful in meeting the sockeye allocation objective and providing escapements within goals.
- Recent genetics studies are robust, but limited sampling with highly variable results does not in itself justify changes to the management plan.
- Genetic results show that the current regulatory assumption that 90% of Igvak sockeye harvests are Chignik bound fish is overly conservative; all samples showed substantially lower contributions of Chignik-bound sockeye to the Igvak harvests.
- Board of Fisheries proposals to alter metrics guiding the Cape Igvak Salmon Management Plan are not well supported by available data.
- The long-standing Cape Igvak plan appears to be working well in terms of limiting harvest of Chignik origin sockeye through harvest guarantees to Chignik, and meeting escapement goals for early and late runs of Chignik sockeye.



Cape Igvak Salmon Management Plan

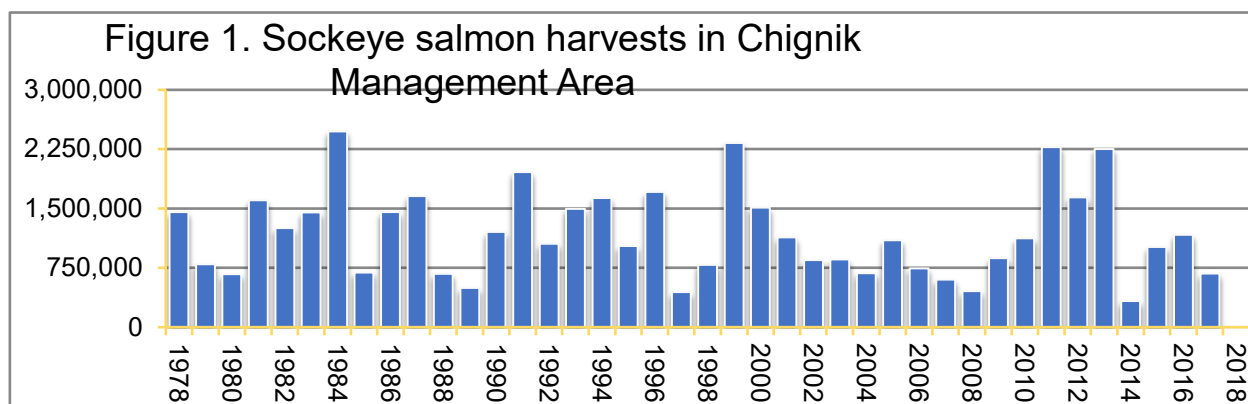
A purse seine fishery has been active along capes in the Cape Igvak section of Kodiak Management Area (KMA) since 1964. Following a tagging study in 1969 (ADFG, unpub. data) where 84% of released tags were recovered in Chignik Area fisheries, periodic modifications to the fishery were directed by the Alaska Board of Fisheries. In 1978, the Cape Igvak Salmon Management Plan (CISMP) was adopted to restrict harvest of Chignik bound sockeye at Cape Igvak. The fishery is one of two in the state (the other is the Southeast District Mainland, Area M) in which harvest and escapement triggers from an adjacent management area (both Area L-Chignik) must be met before the fishery can open. From beginning of the fishing season to July 25, Chignik fishermen must harvest a minimum of 600,000 sockeye salmon (300,000 from both early and late Chignik runs) and adequate escapements for both runs must be projected to occur before harvest will be allowed in Igvak. KMA fishermen at Cape Igvak are allocated 15% of the total Chignik harvest. The Board stipulates that 90% of the harvest at Igvak and 80% of the harvest in Southeast District Mainland (Area M) are Chignik bound fish (Anderson et al., 2019, Wilburn, 2019). Proposals to the Board for the 2020 Kodiak Management Area focus on specific metrics in the plan.

Since the CISMP plan came about, management has been very effective at meeting the allocation objectives in the plan. Only four times in forty years has the 15% target been exceeded by more than 1% (Anderson et al., 2019), which is probably within reasonable expectations for management error. Harvests of Chignik bound fish at Igvak obviously go up and down with Chignik harvests and the Igvak fishery has been closed, or catches extremely low, three times between 2014 and 2018 due to poor



runs and lower harvests in Chignik. On the other hand, Igvak sockeye harvests were much more robust in 2011 and 2013 when Chignik sockeye harvests exceeded 2 million sockeye (Anderson et al., 2019). While Chignik sockeye harvest was essentially zero for 2018, the forty year history shows wide fluctuations, with two of the lowest and two of the highest harvests occurring in the past ten years (Figure 1). Average Chignik sockeye harvests between 1998 and 2018 were about 15% lower than harvests in the previous two decades, 1978-1997. However, three of four harvests over 2 million fish were also in the most recent two decades (Figure 1).

The management plan has also been effective from a conservation and sustainability standpoint. Early and Late sockeye runs to Chignik River have met or exceeded their respective escapement goals every year since 1980, until the run failure in 2018, when the early Chignik sockeye run



failed to meet the escapement goal (Munro, 2019).

Recent Genetics Studies in Igvak Section

In the recent fishery genetic stock identification study in KMA, Shedd et al. (2016) added two sampling strata (early and middle) for Cape Igvak Section in each of the three study years, 2014-2016. No Igvak samples



were taken in 2014 because low Chignik harvest numbers kept the area closed to commercial harvest. In 2015, only the July stratum (middle) was sampled as Igvak was again closed in June due to inadequate sockeye harvests in Chignik Management Area. Harvest of Chignik fish in Igvak was estimated as 2,059 fish (total harvest 6,595) in the middle stratum, 2015. In both 2014 and 2015, the management plan had its intended effect of keeping Igvak closed or limited when Chignik harvests were low. In 2016, with a stronger Chignik run, an estimated 114,412 Chignik sockeye were harvested in the early (June) stratum. An estimated 10,006 Chignik bound sockeye were harvested at Igvak in July (Shedd et al., 2016).

While it is clear that Chignik fish were captured at Igvak in both years, with only three temporal strata sampled over a three year period, including a single datum for early strata harvests, specific conclusions about patterns of presence, magnitude or vulnerability of Chignik bound fish in Igvak fisheries are unwarranted. The single early (June) stratum sampled from the three year period estimated harvest of Chignik bound sockeye an order of magnitude larger than the two middle stratum harvests from 2015 and 2016. These data emphasize wide variation for Chignik bound sockeye harvests at Cape Igvak, and do not support substantive changes to the current management plan.

Data in Shedd et al. (2016) also does not support the presumption in the management plan that 90% of sockeye salmon harvests in Igvak are Chignik bound fish. The single middle stratum (July) estimate from 2015 found 31.2% Chignik sockeye from a total harvest of 6,595. The middle stratum estimate from 2016 was much lower, where only 5.6% of the sampled harvest were Chignik fish (total harvest 177,315). The sole early stratum (June) contribution in 2016 was much higher, estimating 74.1% of



Igvak harvests were Chignik origin (total harvest 154,318), but still did not reach 90%. The assumption that 90% of Igvak harvests are comprised of Chignik bound fish is very uncertain. Other genetic studies suggest uncertainty for similar assumptions in Southeast District Mainland (SEDM, Area M) fisheries, where Chignik bound sockeye are thought to represent 80% of sockeye harvested. Dann et al., (2012), showed that the overall proportion of Chignik bound fish harvested in SEDM was very consistent in 2010, 2011, and 2012 at 65%, 67% and 66% respectively, excluding the Northwest Stepovak Section in July.

Board of Fisheries Proposals

There are five proposals before the board which address the Cape Igvak fishery. Four of these seek to more severely curtail the fishery through specific alterations to metrics of the management plan. They propose completely eliminating fishing at Igvak prior to July 8 (proposal 58), lowering the board approved allocation of Chignik bound fish to KMA fishermen at Igvak from 15% to 5% (proposal 60), or dramatically raising Chignik harvest thresholds upon which Igvak fishery openings are predicated (proposal 61). A fourth proposal suggests that accounting practices for total Chignik harvest be changed such that harvests in Southeast District Mainland (Area M) and Igvak are no longer considered part of the Chignik total harvest. None of these proposals provide credible, data-driven justification for changing longstanding management plans. Recent genetic stock identification results reflect very limited sampling at Cape Igvak (Shedd et al. 2016) and as a result, insight regarding harvest patterns of Chignik sockeye in Igvak fisheries is narrow. There is no doubt that stock composition and harvest estimates are accurate and precise, but



only three strata in two different years were analyzed, where estimated harvest numbers of Chignik bound fish at Igvak were an order of magnitude different between them.

- **Proposal 58** would close Cape Igvak to fishing until July 8, based on increases in KMA harvests and declines in Chignik harvests. However, Chignik fish represented a relatively minor component of Westside KMA harvests sampled in Shedd et al. (2016) and there is no data linking historical harvests in KMA to Chignik harvests. Increases in KMA sockeye harvests over the years most-likely resulted from greater harvests of local sockeye stocks and sockeye from enhancement efforts by Kodiak Regional Aquaculture Association, which averaged about 345,000 during 2008 - 2017 (Anderson et al., 2018). Though Chignik suffered a run failure in 2018, long term average harvests during 1998-2018 are only 15% smaller than those from 1978-1997.
- **Proposal 59** seeks to change fishery accounting practices in CISMP by eliminating SEDM and Cape Igvak harvests from the total Chignik sockeye harvest, for allocation purposes within the plan. Currently 80% of sockeye harvested in most areas of SEDM and 90% of sockeye in Igvak are assumed part of total Chignik harvest. The effect of this is that allocation percentages would be reached sooner and harvests at Cape Igvak would be smaller. If the management plan assumes a specific percentage of Chignik origin fish in SEDM or Igvak, it must be included in



allocative accounting. It would be inappropriate to address only Igvak with such a proposal.

- **Proposal 60** would lower the allocation percentage of Chignik sockeye to Cape Igvak fishermen from 15% to 5% supposedly because at the inception of the management plan, KMA sockeye harvests were weak and Chignik harvests were robust, and now the situation is reversed. While KMA sockeye harvests have improved since 1978 due to local stock performance and enhancement efforts, there is no evidence that any declines of CMA sockeye harvests are tied to Cape Igvak sockeye harvests. Chignik harvests show wide variation since 1978 as many salmon systems do. Two of the highest and two of the lowest Chignik area sockeye harvests have occurred during the last decade (Figure 1). This proposal would significantly reduce harvest in Kodiak's longstanding fishery at Cape Igvak without justification.
- **Proposal 61** would raise harvest thresholds for the early and late Chignik run combined from 600,000 to 1,000,000 sockeye before Igvak could open and guarantee a harvest of 1,000,000 sockeye to Chignik fishermen. The proposal would probably close the Igvak fishery. Justification is based on unstated changes in assumptions and economic conditions that have occurred since inception of the management plan. This is essentially the same proposal submitted to the Area M board meeting in 2019 to



severely curtail the SEDM fishery, which the Board of fisheries rejected.

Proposal 62 creates mandatory reporting for vessels entering or leaving Cape Igvak section. It is likely unworkable and ineffective for fisheries managers to perform this monitoring.

Literature Cited

Anderson, T.J., J. Jackson, B. A. Fuerst, and A. E. Dorner. 2019. Kodiak Management Area commercial salmon fishery annual management report, 2018. Alaska Department of Fish and Game, Fishery Management Report No. 19-17, Anchorage.

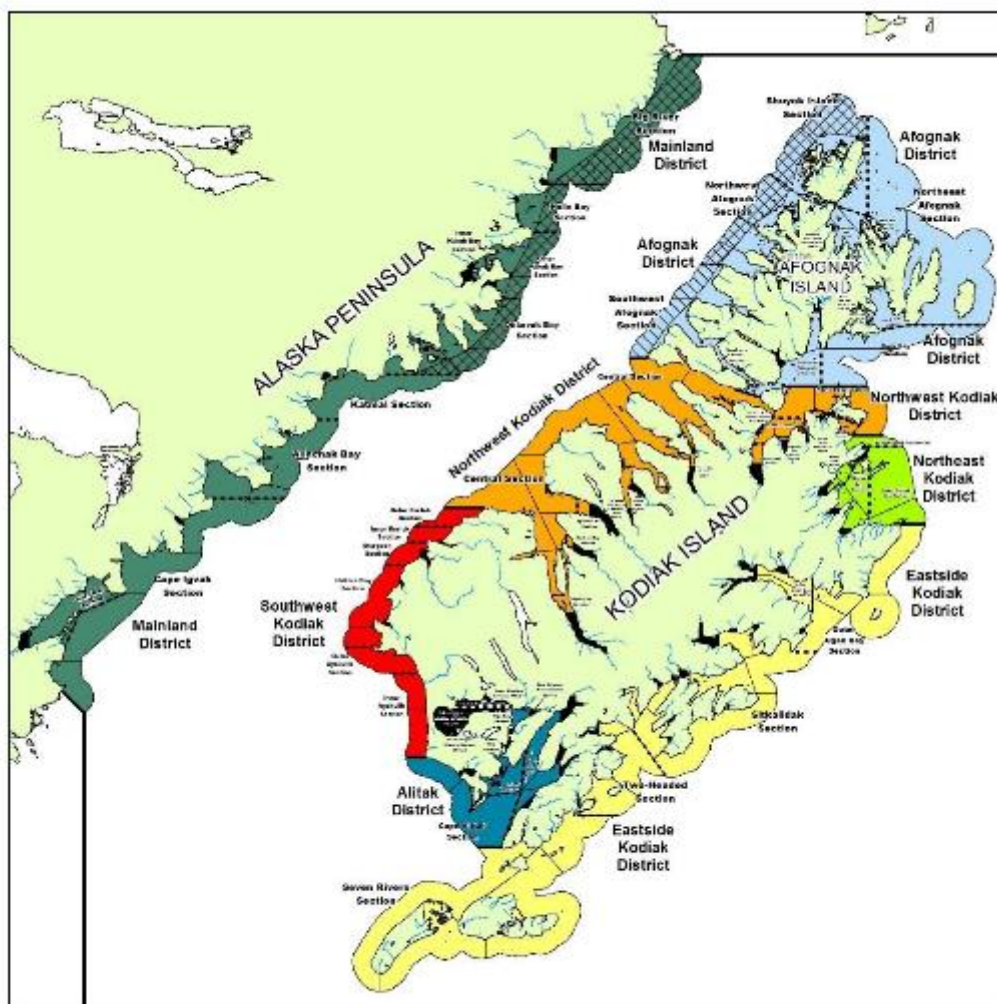
Dann, T. H., M. J. Witteveen, S. D. Rogers Olive, C. Habicht, M. B. Foster, H. L. Liller, and W. D. Templin. 2012. Genetic stock composition of the commercial harvest of sockeye salmon in Southeastern District Mainland, Alaska Peninsula Management Area, 2010–2012. Alaska Department of Fish and Game, Special Publication No. 12-31, Anchorage.

Munro, A. R. 2019. Summary of Pacific salmon escapement goals in Alaska with a review of escapements from 2010 to 2018. Alaska Department of Fish and Game, Fishery Manuscript Series No. 19-05, Anchorage.

Shedd, K. R., M. B. Foster, T. H. Dann, H. A. Hoyt, M. L. Wattum, and C. Habicht. 2016. Genetic stock composition of the commercial harvest of sockeye salmon in Kodiak management area, 2014–2016. Alaska Department of Fish and Game, Fishery Manuscript Series No. 16-10, Anchorage.

Wilburn, D. M. 2019. Chignik Management Area commercial salmon fishery harvest strategy, 2019. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 4K19-09, Kodiak.

2019-2020 Board of Fish || Kodiak Finfish || Proposal 58



Economic Analysis Proposal 58

Kodiak Salmon Workgroup



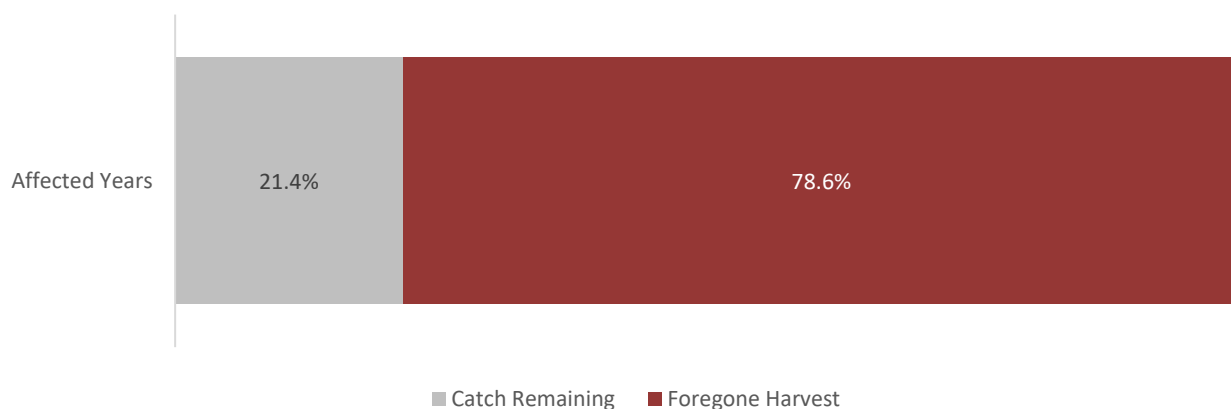
Key Findings

- Overall, proposed changes from Proposal 58 would result in an economic loss in the Kodiak Borough of almost three million dollars a year.
- On average, restrictions during the effected years would result in more than 75% of the current sockeye catch being eliminated.
- The complete implementation of proposal 58 would result in an average foregone harvest worth at least \$1.9 million ex vessel price per year among affected fishermen.
- Direct loss of foregone sockeye harvest per year ranges from \$140,000 to \$6.25 million over the time period examined (1998-2019). The mean foregone sockeye harvest is valued at \$1.89 million per year, using each year's prices.
- Sockeye loss per permit holder affected ranges from \$3,000 to \$79,000 per year (mean \$27,000), depending on number of affected fishermen and count of foregone sockeye harvest.
- Total foregone harvest among all species is estimated to be 1.58 million pounds per year worth an average of \$1.99 million per year, using each year's prices. Average loss per affected permit holder estimated to be \$28,000 per year.
- Species specific foregone harvest ex vessel price estimated to range between \$0 (coho) to \$6.25 million (sockeye) per year.

**\$2.99 Million Dollars
Annual Economic Loss in
the Kodiak Borough**

**\$1.99 Million Dollars
Yearly Direct Loss to
Fishermen**

Average Revenue Loss Per Year





Methodology and Data Sources

Background

The 2019-2020 Board of Fish, Kodiak Finfish Proposal 58 proposes to amend the Cape Igvak Management Plan to restrict all commercial salmon fishing in the Cape Igvak Section before July 8th and until after the Chignik area sockeye harvest exceeds 300,000. The Chignik area includes all sockeye harvest in the Chignik Management Area, 80% of sockeye harvest in East Stepovak, Southwest Stepovak, Stepovak Flats, Balboa Bay, and Beaver Bay Sections and 90% of sockeye harvest in Cape Igvak.

Proposal 58 is only focused on the Cape Igvak section, Kodiak Mainland District.

Link to Proposal:

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/proposals/58.pdf>

Data Sources

Foregone harvest days count and pound data was provided by the State of Alaska, Department of Fish and Game daily harvest reports. Price data for 1998-2018 was provided from the State of Alaska, Department of Fish and Game *Commercial Operator's Annual Reports* (COAR). 2019 price data was not available through the COAR report at the time of this analysis. 2019 price data is estimated from the five-year average of the reported 2014-2018 price per pound per species (see methods below). Multipliers for indirect and induced economic impact were commissioned from the US Department of Commerce, Bureau of Economic Analysis specifically for the Alaska commercial fishing industry. Inflation rates are provided from the US Department of Labor, Consumer Price Index. Tax information is from the State of Alaska, Department of Revenue and the Kodiak Borough.

Data Methods

Economic impact is estimated using historical harvest data from 1998-2019. Proposal 58 applies to all gear types and all gear harvest totals used in estimating impact. For the period prior to July 8th, no fishing occurred in Cape Igvak in 1998, 2008-2009, 2014-2015, and 2018-2019.

Proposal 58 would be in effect prior to July 25th for all years, including a total closure of the Cape Igvak fishery prior to July 8th. Additional restrictions would be in place dependent on Chignik sockeye harvest totals (under proposal 58, 90% of the Cape Igvak sockeye harvest is counted towards this value. Under BOF proposal 59, none of the Cape Igvak or Southeast Mainland District is counted towards this total). Total harvest counts in the Cape Igvak section were aggregated across days of closure (prior to July 8) for each year.



Additional closures would be in effect for a total of 10 days in 2003 and 2004 as the 300,000 minimum Chignik area harvest were not met.

The value of foregone harvest is calculated as species-specific foregone harvest pounds multiplied by species-specific Kodiak area price per pound for each year. Foregone harvest counts and economic impact are calculated for Cape Igvak as a whole. The number of permit holders affected by proposal 58 is calculated as the maximum number of unique permits during the closure period in harvest records.

Species specific prices per pound for each year between 1998-2018 were obtained from the Fish Game COAR for each individual year. The total net weight in the Kodiak area for each species for each season is divided by the respective net value.

Final 2019 COAR price per species data is not available. Species specific price for 2019 was estimated as a five-year average of available COAR data (2014-2018). Verification of 2019 data with the KSWG provided spreadsheets using Icicle, Ocean Beauty, and Pacific season prices for 2017-2019 compared to COAR for 2017, 2018. The spreadsheet values varied from published COAR by both higher and lower values up to 20%. The five-year average was much closer to 2017 and 2018 prices than the spreadsheet averages and weighted averages for respective years. The sockeye 2019 season price per pound estimate may be biased downwards given the processor spreadsheet; the COAR numbers were up to 20% lower than provided spreadsheet, and the five-year average is 16% lower than 2019 processor spreadsheet.

Indirect and induced economic loss was calculated from Regional Input-Output Modeling System (RIMS II) type I and type II multipliers. These take into account increase (in this case local loss) in regional economic activity due to change in industry specific earnings. For this report, the fisheries industry specific multipliers were used. Selected industry multipliers are specific to Alaska.

All values are adjusted for inflation and shown in 2019 dollar values.



Results & Data Tables

Direct Losses

On average, in the years effected by Proposal 58, more than 75% of the current catch would be restricted. From year 1998-2019, more than 55% of the harvestable catch would be foregone. Overall, these changes would result in an economic loss to the Borough of almost three million dollars a year.

\$1.99 Million Dollars Yearly Direct Loss to Fishermen	Direct revenue lost to the Kodiak Borough per year:	
	Direct loss per affected year:	\$1.99 Million
\$2.99 Million Dollars Annual Economic Loss in the Kodiak Borough	Loss from sockeye fishery:	\$1.89 Million
	Fisheries employment impact:	17.6 jobs per year
	All employment impact:	22.1 jobs per year
	Indirect community loss:	\$414,120
	Induced community loss:	\$583,478
	Total Annual Borough Loss:	\$2,992,397

Proposal 58 would have impacts throughout the Kodiak Borough. The direct loss to fishermen would be \$1.99 million per year. Of the total loss to the fishery, the limitation on the sockeye fishery comprise the majority of the impact, accounting for \$1.89 million of the loss with \$100,000 of the total loss distributed among other salmon species.

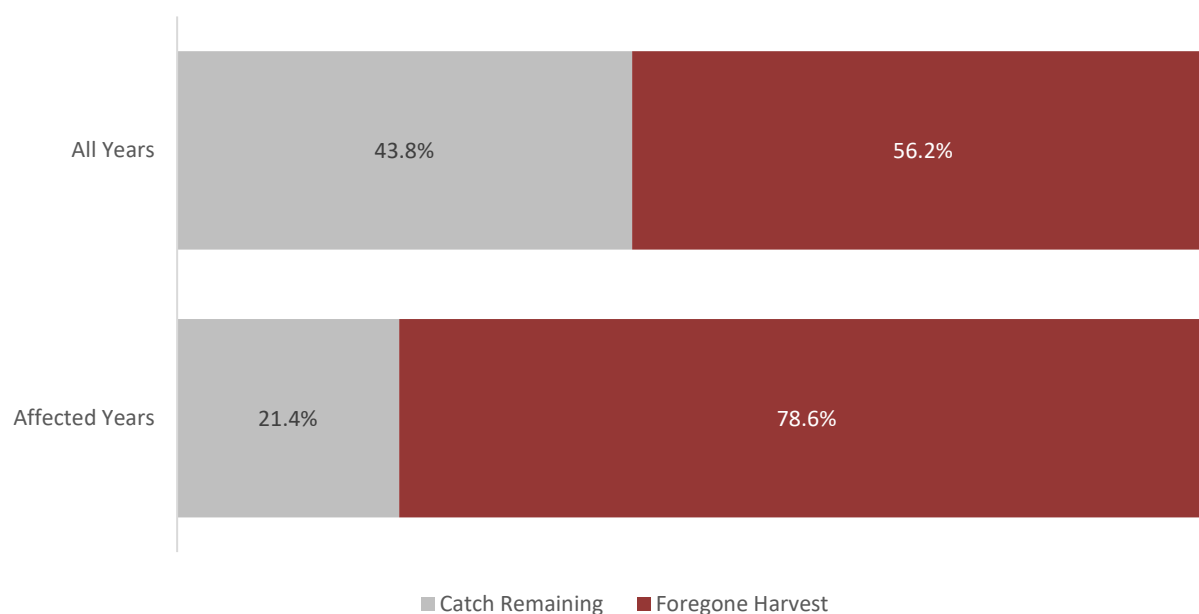
The direct impact of this proposal will result in a loss of 17.6 fisheries specific jobs and a total of 22.1 jobs overall in the Kodiak Borough per year. In addition to the direct loss impact of \$1.99 million, there is a further indirect loss of \$414k as a result of lost business to business economic activity for the community from purchases such as fuel, gear, and supplies. There is an additional \$583k of induced loss in the community resulting from the lost direct and indirect economic activity (total \$2.40 million) and reduced labor market. This impact results in a total loss to the community from direct, indirect, and induced losses of \$2.99 million dollars per year.



Fisheries Loss

On average, restrictions during the effected years would result in more than 75% of the current catch being eliminated. For all years, including six unaffected years, the average revenue loss to the community would be more than 55%.

Chart 1: Average Revenue Loss Per Year



Over the last 22 years 1998-2019, there have been 10 years where the fisheries losses from these increase restrictions would result in a loss of more than one million dollars of foregone ex vessel value to the fishery. Six of the previous 22 years would be unaffected by the proposal changes. Fishing was severely restricted in 2018 due to historically low run returns.

The sockeye fishery would experience ex vessel losses of more than \$1 million for nine of the 15 affected years.



Chart 2: Total Fishery Loss 1998-2019

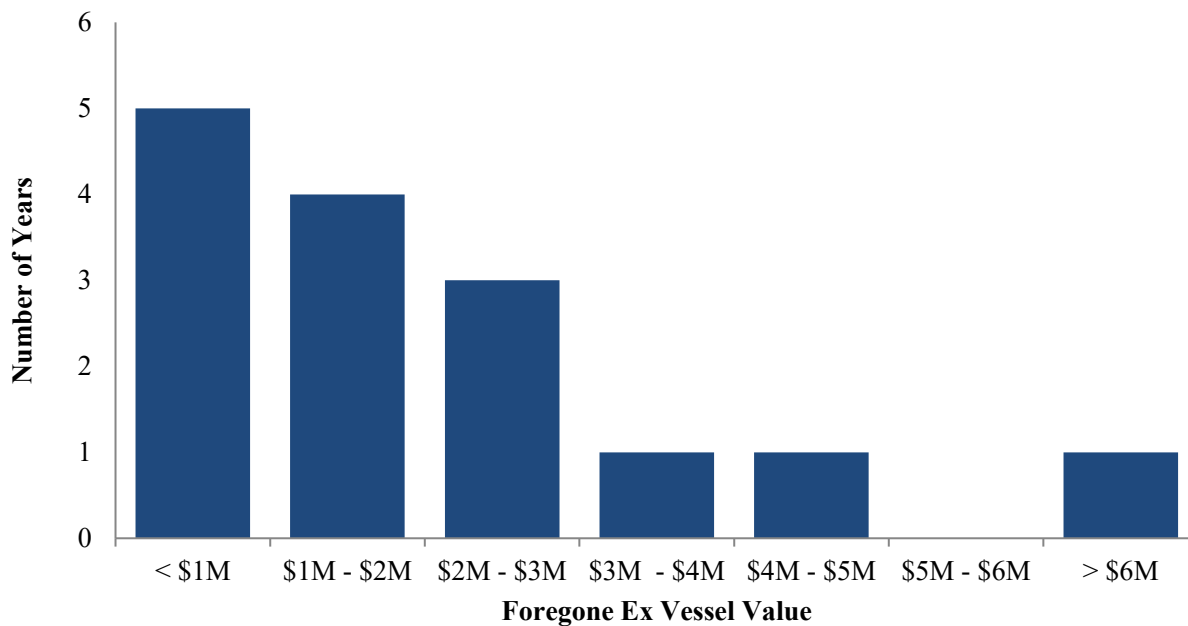
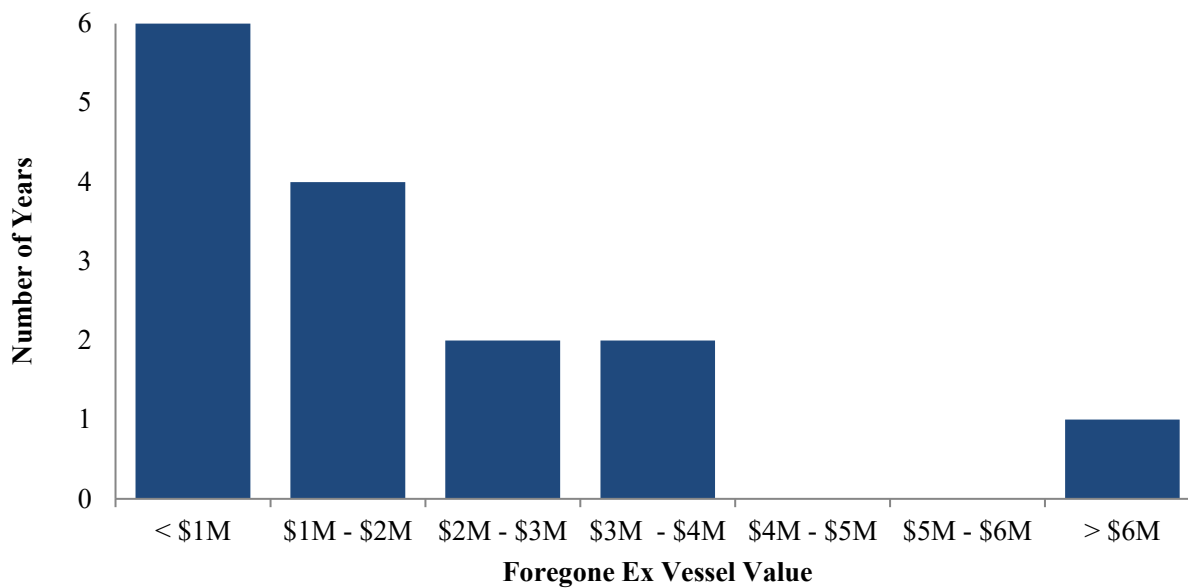


Chart 3: Total Sockeye Loss





The mean direct loss for all species per year is \$1,994,798 with a median loss of \$1,331,454. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$6,659,154 and the least impact would have been in 2006 with a loss of \$168,071.

Table 1: Direct Loss of Proposal 58 Implementation

Year	Direct Loss All Species	Direct Loss Sockeye
1998	No Impact	
1999	\$3,508,007	\$3,442,997
2000	\$2,360,808	\$2,323,611
2001	\$1,024,685	\$962,626
2002	\$848,667	\$799,675
2003	\$688,343	\$631,512
2004	\$898,710	\$869,284
2005	\$2,217,289	\$1,975,671
2006	\$168,071	\$139,644
2007	\$505,519	\$448,390
2008	No Impact	
2009	No Impact	
2010	\$1,709,608	\$1,622,292
2011	\$6,659,154	\$6,253,079
2012	\$2,731,307	\$2,586,591
2013	\$4,003,809	\$3,941,638
2014	No Impact	
2015	No Impact	
2016	\$1,266,541	\$1,159,328
2017	\$1,331,454	\$1,198,552
2018	No Impact	
2019	No Impact	
Mean	\$1,994,798	\$1,890,326
Median	\$1,331,454	\$1,198,552
Min	\$168,071	\$139,644
Max	\$6,659,154	\$6,253,079

**Table 2: Direct Loss of Proposal 58 Implementation Per Fishermen**

	Average Loss Per Fishermen - All Species	Average Loss Per Fishermen - Sockeye Only
Mean	\$28,399	\$26,819
Median	\$22,272	\$21,921
Min	\$3,909	\$3,248
Max	\$84,293	\$79,153

Based on the number of active permits per year, individual fishermen would experience a mean direct loss for all species per year of \$28,399 with a median loss of \$22,272. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$84,293 per fishermen with the least impact in 2006 with an average loss of \$3,909.

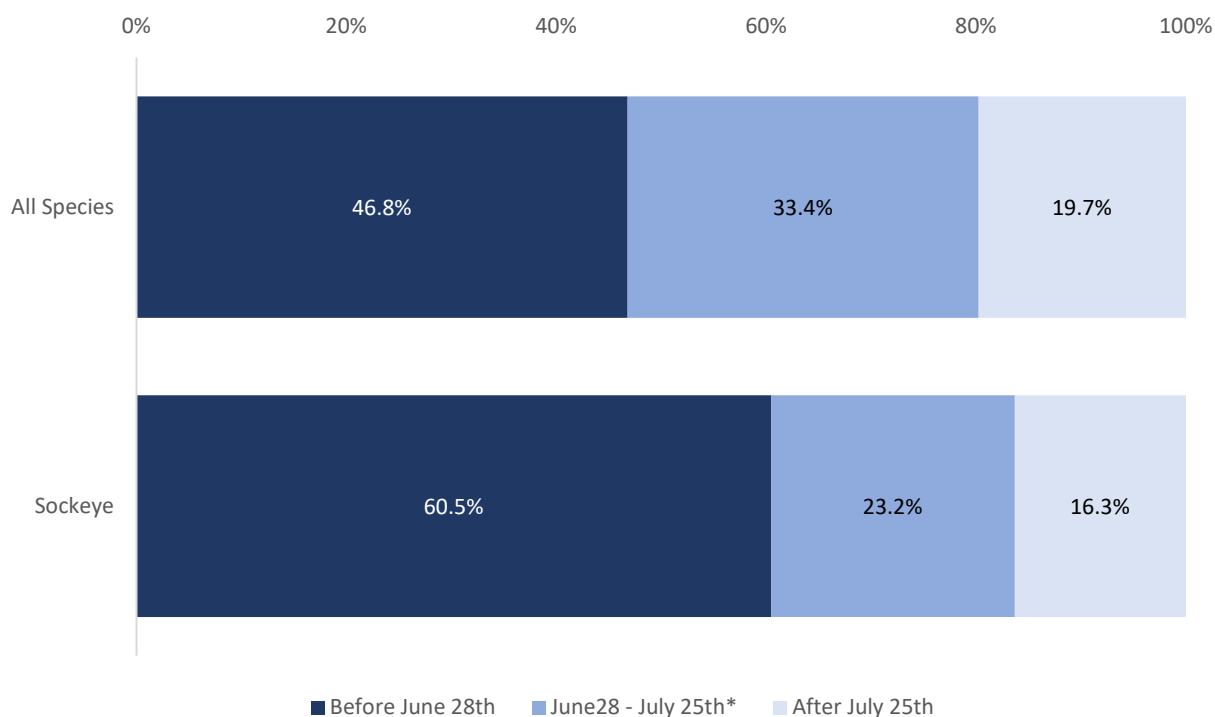
Table 3: Loss Per Affected Permit Holder

Year	Permits	Loss per Permit	Total Value Foregone Harvest	2019 Inflation Adjustment
1998			No Impact	
1999	104	\$33,731	\$2,272,025	\$3,508,007
2000	106	\$22,272	\$1,580,192	\$2,360,808
2001	57	\$17,977	\$705,220	\$1,024,685
2002	68	\$12,480	\$593,473	\$848,667
2003	78	\$8,825	\$492,377	\$688,343
2004	37	\$24,289	\$659,846	\$898,710
2005	71	\$31,229	\$1,683,590	\$2,217,289
2006	43	\$3,909	\$131,717	\$168,071
2007	32	\$15,797	\$407,348	\$505,519
2008			No Impact	
2009			No Impact	
2010	58	\$29,476	\$1,448,820	\$1,709,608
2011	79	\$84,293	\$5,826,032	\$6,659,154
2012	57	\$47,918	\$2,438,667	\$2,731,307
2013	72	\$55,608	\$3,626,639	\$4,003,809
2014			No Impact	
2015			No Impact	
2016	60	\$21,109	\$1,181,475	\$1,266,541
2017	78	\$17,070	\$1,269,261	\$1,331,454
2018			No Impact	
2019			No Impact	
Average		\$28,399	\$1,621,112	\$1,994,798



On average, the majority of sockeye and almost half of total catch (by weight) in Cape Igvak for each season is caught before June 28th. For this reason, the impact of proposal 58 (total closure of Cape Igvak before July 8th) is much higher than the impact of proposal 65 (closure between 6/28 and 7/25). Of note, no fishing occurred in Cape Igvak during any year (1998-2019) between June 28th and July 8th.

Chart 4: Average Total Weight Caught During the Season in Cape Igvak by Time Period



Foregone Tax Revenue

The foregone harvest due to proposal 58 implementation would have tax implications for state, borough, and city budgets. The state implements two relevant taxes in the region: the fisheries business tax (which is shared with local governments) and the salmon enhancement tax (SET). Fisheries business tax rates vary by type of processing activity and the proportion of each is estimated from the State of Alaska's Annual Tax Report for FY18. The salmon enhancement tax rate is 2% in the Kodiak region. The Borough implements a resource severance tax of 1.075% and receives a share of the fisheries business tax from the state. The local city governments also receive a share of the fisheries business tax from the State of Alaska. Borough and city shares of the fisheries business tax estimated from the Borough's FY18 annual tax report.

The implementation of proposal 58 would result in average yearly tax losses of \$72,000 to the State of Alaska, \$32,000 to the Kodiak Borough, and \$10,000 to Kodiak City.



State Taxes

Fisheries Business Tax (50% Share)	\$32,326
SET Tax	\$39,896
Total	\$72,222

Borough

Resource Severance Tax	\$21,444
Fisheries Business Tax (Share of 50%)	\$10,322
Total	\$31,766

Cities

(Share of Fisheries Business Tax)

Akhiok	\$2,409
Kodiak	\$9,620
Larsen Bay	\$2,407
Old Harbor	\$2,585
Ouzinkie	\$2,498
Port Lions	\$2,484
Total	\$22,003



Loss by Species

Table 4: Sockeye Foregone Harvest

Year	Foregone Harvest - lbs	Sockeye Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	2,063,865	\$1.08	\$2,229,920	\$3,442,997
2000	1,739,030	\$0.89	\$1,555,295	\$2,323,611
2001	943,979	\$0.70	\$662,509	\$962,626
2002	909,868	\$0.61	\$559,213	\$799,675
2003	748,823	\$0.60	\$451,726	\$631,512
2004	976,581	\$0.65	\$638,241	\$869,284
2005	1,869,704	\$0.80	\$1,500,130	\$1,975,671
2006	130,411	\$0.84	\$109,438	\$139,644
2007	361,799	\$1.00	\$361,314	\$448,390
2008	No Impact			
2009	No Impact			
2010	969,922	\$1.42	\$1,374,824	\$1,622,292
2011	3,584,803	\$1.53	\$5,470,760	\$6,253,079
2012	1,568,290	\$1.47	\$2,309,456	\$2,586,591
2013	1,961,485	\$1.82	\$3,570,324	\$3,941,638
2014	No Impact			
2015	No Impact			
2016	847,930	\$1.28	\$1,081,462	\$1,159,328
2017	755,297	\$1.51	\$1,142,567	\$1,198,552
2018	No Impact			
2019	No Impact			
Total	19,431,787		\$23,017,180	\$28,354,890

Table 5: Chum Foregone Harvest

Year	Foregone Harvest - lbs	Chum Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	170,112	\$0.19	\$31,572	\$48,747.61
2000	92,806	\$0.22	\$20,153	\$30,108.15
2001	83,888	\$0.32	\$26,773	\$38,900.99
2002	137,679	\$0.16	\$22,253	\$31,821.74
2003	166,509	\$0.14	\$23,184	\$32,410.91
2004	125,877	\$0.12	\$15,458	\$21,053.48
2005	185,393	\$0.20	\$37,447	\$49,318.10
2006	50,260	\$0.33	\$16,799	\$21,436.08



2007	103,667	\$0.35	\$36,489	\$45,283.38
2008	No Impact			
2009	No Impact			
2010	109,744	\$0.56	\$61,481	\$72,547.59
2011	455,032	\$0.69	\$314,002	\$358,904.81
2012	184,103	\$0.60	\$110,888	\$124,194.16
2013	169,242	\$0.25	\$42,981	\$47,450.60
2014	No Impact			
2015	No Impact			
2016	195,096	\$0.34	\$65,775	\$70,510.56
2017	132,879	\$0.57	\$76,223	\$79,958.03
2018	No Impact			
2019	No Impact			
Total	2,362,287		\$901,478	\$1,072,646

Table 6: Pink Foregone Harvest

Year	Foregone Harvest - lbs	Pink Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	7,134	\$0.14	\$1,006	\$1,553
2000	19,270	\$0.14	\$2,771	\$4,139
2001	69,962	\$0.12	\$8,304	\$12,066
2002	104,486	\$0.09	\$8,984	\$12,848
2003	136,662	\$0.09	\$12,000	\$16,776
2004	22,668	\$0.10	\$2,174	\$2,961
2005	1,084,704	\$0.12	\$130,269	\$171,564
2006	11,709	\$0.16	\$1,916	\$2,445
2007	20,788	\$0.18	\$3,750	\$4,654



2008	No Impact			
2009	No Impact			
2010	19,416	\$0.44	\$8,446	\$9,967
2011	48,944	\$0.47	\$22,780	\$26,038
2012	29,660	\$0.48	\$14,147	\$15,844
2013	15,872	\$0.42	\$6,716	\$7,415
2014	No Impact			
2015	No Impact			
2016	55,585	\$0.47	\$26,237	\$28,126
2017	113,573	\$0.43	\$48,638	\$51,021
2018	No Impact			
2019	No Impact			
Total	1,760,433		\$298,138	\$367,416

Table 7: Coho Foregone Harvest

Year	Foregone Harvest - lbs	Coho Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	0	\$0.41	\$0	\$0
2000	0	\$0.49	\$0	\$0
2001	62	\$0.24	\$15	\$22
2002	10,920	\$0.18	\$20	\$28
2003	5,693	\$0.20	\$1,138	\$1,591
2004	29	\$0.27	\$8	\$11
2005	341	\$0.42	\$143	\$189
2006	14	\$0.66	\$9	\$12
2007	36	\$0.60	\$22	\$27
2008	No Impact			



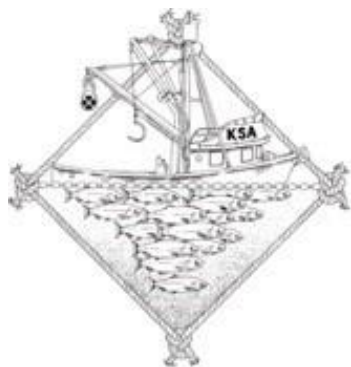
2009	No Impact			
2010	116	\$0.80	\$92	\$109
2011	120	\$0.82	\$98	\$112
2012	7	\$0.77	\$5	\$6
2013	0	\$0.72	\$0	\$0
2014	No Impact			
2015	No Impact			
2016	227	\$0.78	\$178	\$191
2017	52	\$0.84	\$43	\$46
2018	No Impact			
2019	No Impact			
Total	17,617		\$1,772	\$2,342

Table 8: Chinook Foregone Harvest

Year	Foregone Harvest - lbs	Chinook Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	13,994	\$0.68	\$9,527	\$14,710
2000	2,980	\$0.66	\$1,974	\$2,949
2001	10,589	\$0.72	\$7,619	\$11,071
2002	8,155	\$0.37	\$3,003	\$4,295
2003	12,202	\$0.35	\$4,330	\$6,053
2004	7,700	\$0.51	\$3,965	\$5,400
2005	20,508	\$0.76	\$15,601	\$20,547
2006	3,792	\$0.94	\$3,554	\$4,535
2007	6,479	\$0.89	\$5,774	\$7,165
2008	No Impact			
2009	No Impact			



2010	6,169	\$0.64	\$3,977	\$4,692
2011	20,535	\$0.90	\$18,391	\$21,021
2012	6,866	\$0.61	\$4,171	\$4,671
2013	11,504	\$0.58	\$6,618	\$7,306
2014	No Impact			
2015	No Impact			
2016	8,635	\$0.91	\$7,823	\$8,386
2017	2,337	\$0.77	\$1,789	\$1,877
2018	No Impact			
2019	No Impact			
Total	142,445		\$98,116	\$124,679



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 12, 2019

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

RE: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fish Members,

The **Kodiak Seiners Association (KSA) opposes Proposal 58**. The proposal intends to entirely eliminate the Cape Igvak fishery in June while sustaining the 15% allocation of Chignik bound sockeye in the Cape Igvak area along with other sustainability and allocation thresholds that are currently in place. The outcome of the proposal would be to focus the harvest of Chignik bound fish entirely on the second run in July while discontinuing the longstanding traditional harvest of early run Chignik bound sockeye in June.

The Cape Igvak management plan was first adopted in 1978 and has been repeatedly evaluated by the Alaska Board of Fisheries, making it one of the most long-standing and intensely scrutinized management plans in the state. Repeated analysis through the application of the Sustainable Salmon Policy, the Mixed Stock Fisheries Policy, and the Allocation Criteria has resulted in no substantial changes to the Cape Igvak management plan since its inception. The durability of this plan reflects the care with which it was crafted to ensure a management structure that provides equal consideration to Chignik and Kodiak fishermen. The plan includes biological sustainability safeguards as well as allocation and economic considerations to ensure that *traditional fisheries in both* areas are preserved.

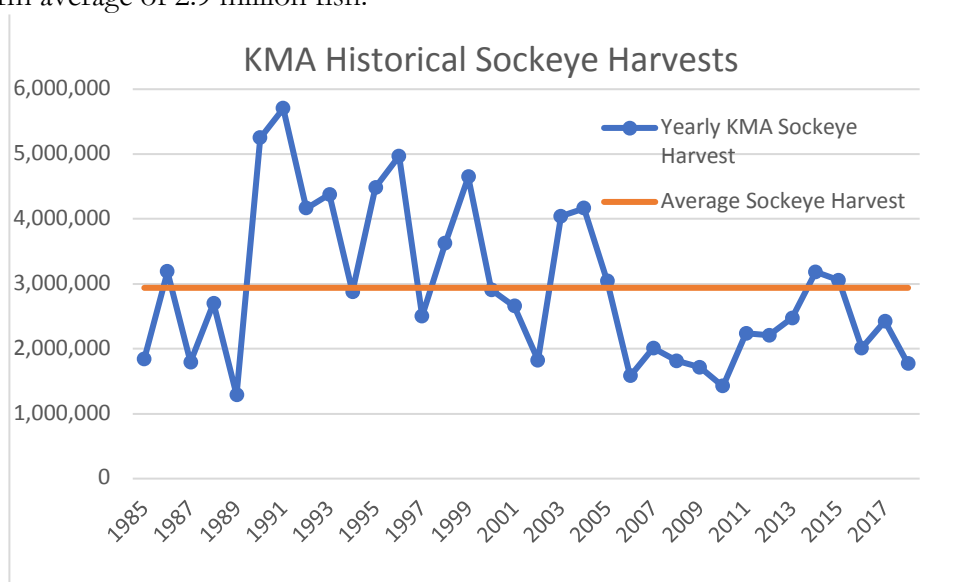
Despite the current narrative posited by detractors of the Cape Igvak fishery, this management was *not* developed as an ad hoc charity for Kodiak fishermen by providing them with access to Chignik stocks. Instead, the management plan was originally designed as a *restriction* on the traditional fishery in the Cape Igvak section. Prior to the implementation of the management plan, the Cape Igvak section would open to commercial harvest concurrently with Chignik, providing equal fishing time in both areas. The plan was crafted in collaboration with Chignik fishermen and it introduced new limitations for the harvest of Chignik bound stocks in Kodiak while recognizing the historical



importance of the fishery to Kodiak fishermen who have now for generations heavily relied on this fishery.

Kodiak's local early sockeye fisheries have not been spared from the gulf-wide trend of decline, likely caused by the notorious warm water event known as the "Pacific Blob." Consistently low harvests have occurred in recent years at Ayakulik, Karluk, Alitak and Spiridon as well as in the minor systems such as Litnik, Saltery, Uganik, Foul Bay, Pauls Bay and others. Nearly universally weak early sockeye runs have led to dismal June harvest numbers in Kodiak. The underlying premise of the proposal, that strong runs in Kodiak and weak runs in Chignik warrant focused fishing effort in the Cape Igvak section to July, is patently false and would provide further economic harm to a fleet that desperately needs more early season fishing opportunities.

KSA hopes that the Board is not swayed by false claims of abundant sockeye harvests in the Kodiak area. The graph below shows sockeye harvests in the KMA since 1985 and clearly demonstrates a long-term trend of decline. Only in 3 of the past 15 years has sockeye harvests in Kodiak exceeded the long-term average of 2.9 million fish:



The only notable exception in recent years to the decline of Kodiak's local sockeye runs is the late Karluk run. After a multidecadal slump, this run has shown signs of a potential revival. Unfortunately, late Karluk harvests proved disappointing in 2019 signaling a possible end to its recent rise. It is unclear how proponents of proposal 58 and 60 have concluded that Kodiak's salmon fishery is "exponentially healthier", since publicly available data clearly demonstrates the contrary. The trend of salmon abundance in Kodiak mirrors the rest of the western Gulf of Alaska, where unpredictability coupled with some historically poor harvests have left the fleet uneasy about the future of the fishery.

KSA would also like mention that our membership is increasingly frustrated in the how the shared resource is currently managed. Chignik fishermen are prosecuting an expanding mixed stock fishery on non-local stocks (see WASSIP), yet their fishing efforts have no restrictions that account for the impact that their harvest has on Kodiak's fishery. Meanwhile, Kodiak fishermen have endured 2 consecutive years of closures in the Cape Igvak area in order to conserve the



Chignik fishery in addition to closures in the “seaward zones” of the North Shelikof straight designed to inhibit the harvest of Cook Inlet stocks. The impact of Chignik’s harvest of Kodiak fish was made abundantly clear to our fishermen in 2018 when closures in Chignik and Area M resulted in far higher than expected returns to the Kodiak fishery. Although that season was still poor by most standards, a clear migration path for Karluk sockeye provided just enough fish to sustain our fleet for the season.

KSA respectfully requests the Board to **reject proposal 58** and recognize that Kodiak has not been somehow spared from impacts of the Pacific Blob or regional trends in declining sockeye runs. We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of regulations regarding our fisheries and trust that the Board continue to apply consistency in designing regulation changes while applying the guiding BOF policies, such as the Management for Mixed Stock Salmon Fisheries.

Kodiak Seiners Association represents 157 members, including the majority of actively fishing SO1K seine permit holders, Kodiak and Homer-based businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADF&G, the Board of Fisheries, and our State Legislature.

Sincerely,

Nate Rose
KSA President



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

My name is Mariel Ellingson, I'm 30 years old and I grew up set netting In kodiak. I live in kodiak and was fortunate to participate in this years salmon seine season. These are not conservation proposal.



December 24, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 58

Dear Chairman Morisky and board of fisheries members,

My name is Matthew Alward from Homer, AK and I oppose proposal 58 that would close a traditional Kodiak fishery. I support our family participating in the Kodiak salmon seine fishery and have raised our kids on the back deck of our family seine boat. The Cape Igvak section is an important part of our fishery and proposal 58 would close it from the beginning of the season till July 8th which has been part of the Kodiak fishery for many decades.

The Cape Igvak management plan was adopted in 1978 and since then it has had numerous proposals aimed at shifting the allocation more towards Chignik. Throughout all of the board of fisheries deliberations on the many proposals to amend the Cape Igvak management plan the board has applied their Allocation Criteria, Sustainable Salmon Policy, and the Mixed Stock Fisheries Policy and all of the past boards have determined that no changes were warranted. This proposal would take approximately 50% of Kodiak's longstanding traditional fishery in the Cape Igvak section away without any real justification.

The proposer alleges that the Cape Igvak management plan was put in place because of poor Kodiak sockeye returns which have rebounded and that justifies closing half of the Igvak fishery. In fact the plan was put in place to limit the Cape Igvak fishery and had nothing to do with Kodiak Island sockeye runs at all. Prior to the plans implementation Igvak was opened congruent with Chignik and they both



had equal fishing time. The current management plan acknowledges the mixed stock nature of the Igvak section and sets an allocation with protections for conservation in low abundance and the fact that the Cape Igvack section has not opened four of the last six years shows that the conservation measures in the plan are working.

Kodiak Island sockeye stocks have been negatively affected by the “Pacific warm blob” event that has affected many other Gulf of Alaska salmon stocks including Chignik. The last ten year average of Kodiak sockeye harvest has been below the 35 year average which shows the same declining trend that Chignik has experienced. I have not seen any data that would suggest a major shift in the sockeye harvest in the Cape Igvak management section that would warrant closing half of the Igvak fishery.

In closing I contend that the Cape Igvak management plan has been working as intended for over 40 years and should remain unchanged and respectfully ask you to oppose proposal 58 and not adopt it.

Sincerely,

Matthew Alward



Nicholas Hoffman
PO Box 1212
Kodiak, AK 99615

12/24/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 58

Dear Chairman Morisky and Board of Fish members:

I'm a young Kodiak salmon fisherman. I have been running a seine boat since 2011 as well as participating in Kodiak halibut, sea cucumber, cod jig, and tanner crab fisheries. I respectfully request the Board reject Proposal 58.

The Cape Igvak management plan is a historical plan that has been in place for a long time and worked very well. There are safeguards built into this plan that insure that Chignik fishermen catch lots of fish before the Igvak Area can even open to Kodiak fishermen. While unfortunately Chignik runs have been in a downcycle the last few years, run strengths are cyclical and Chignik may be strong again. This proposal is allocative and has no basis in conservation as the current Igvak management plan already takes weak Chignik runs into account: Igvak area does not open to Kodiak fishermen when Chignak has a weak run. This proposition is an attempt to disenfranchise a historical Kodiak fishery and give more fish to Chignik fishermen.

I see no reason for the Board to make any changes to the Kodiak Salmon Management plan. Thank you for the opportunity to comment on the proposals and the chance for my voice to be heard. I look forward to the Board of Fish members getting to spend time in Kodiak and learn more about our town and fishing community.

I humbly request the Board reject Proposal 58.

Sincerely,

Nicholas Hoffman
F/V Relentless



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

I have fished salmon around Kodiak for more than fifty years. Not allowing an Igvak fishery before July 8th would mean the Kodiak seine fleet would be very unlikely to achieve the allocation. It has been very difficult for the Kodiak seine fleet to make money in June recently. If the Chignik run is weak we wouldn't be fishing in June but in good returns Igvak is a significant opportunity to make June fishing viable for seiners. The long standing Igvak plan works well and nothing has changed that justifies changing it.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

December 27, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 RE: Opposition to Proposal 58 Dear Board of Fish Members, ? My name is Peter Ivanoff and have been a commercial salmon fisherman in Kodiak for 20 years and started going on salmon trips with my father earlier than that. I am very concerned with proposal 58 and how this proposal could affect my family and the Kodiak community in general. The intention of this letter is to oppose Proposal 58. The proposal intends to entirely eliminate the Cape Igvak fishery in June while sustaining the 15% allocation of Chignik bound sockeye in the Cape Igvak area. This proposal would be to focus the harvest of Chignik bound fish entirely on the second run in July while discontinuing the longstanding traditional harvest of early run Chignik bound sockeye in June. The Management plan for this area has been active since 1978, and claims that the Kodiak fishery is thriving while Chignik is declining are not true. In actuality Kodiak has had poor sockeye returns in the past ten years. The management plan was originally put together as a restriction on the fishery in the Cape Igvak section. Before the management plan in Cape Igvak, the section would open to fish at the same time as Chignik. This plan includes sustainability as well as allocation and economic considerations to ensure the fisheries remains healthy. A change to this plan and closing the area earlier than the current plan would have a devastating impact on the Kodiak salmon fleet and shore based support. Peter Ivanoff



December 26, 2019

Quinn Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 58

Dear Chairman Morisky and board of fisheries members,

My name is Quinn Alward and I have grown up fishing in the waters of Kodiak with my family since I was 10. It is 12 years later and commercial salmon seining is still a very big part of my life. I oppose proposal 58 that intends to close the Cape Igvak section from the beginning of the season until July 8th. The Cape Igvak section is a special area to me and being able to fish it when it's opened has helped me make enough to pay my way through college.

The current Cape Igvak management plan has been in place since 1978 and over the last few decades numerous proposals have been brought up trying to shift the allocation of Cape Igvak fish to the Chignik area. Every time the board of fisheries has deliberated the proposals it has applied their Sustainable Salmon Policy, the Mixed Stock Fisheries Policy and their Allocation Criteria always ending in with the determination that no changes were warranted.

The proposal would take away almost half of the time we can fish in Cape Igvak with no solid justification.

For this reason I ask that you oppose proposal 58 and by not adopting it, help me and my family continue on with fishing traditions I've known my whole life.

Sincerely,

Quinn Alward



December 24, 2019

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

Re: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fisheries Members,

I am Richard Roth, Kodiak salmon purse seine permit holder and fisherman. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife, three children and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Tzar. I formally owned and operated the F/V Kelly Girl. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject this proposal and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
Richard, Amanda, Stephanie, Noah, and Ranger Roth
F/V Sea Tzar
Homer, Alaska



December 19, 2019

Robert Fellows

266 E Bayview Ave.

Homer, AK. 99603

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, Ak. 99811-5526

RE: Opposition to proposal 58

Dear chairman Morisky and Board of Fisheries members,

I am a commercial salmon fisherman who has fished in the Kodiak area for 29 years. Salmon fishing generates the majority of my family's yearly income as well as for my crewmembers. The Cape Igvak section is part of the historical fishing area for Kodiak and should remain so. I respectfully request the board reject proposal # 58.

The Cape Igvak management plan was created to allow Kodiak fishermen access to their historic fishing patterns. The Cape Igvak section currently doesn't open until 300,000 sockeye have been harvested in Chignik and the Chignik run has a sizable harvest surplus. When the Chignik run is weak the Cape Igvak section doesn't open. The proposal mentions run strengths. Run strengths are cyclical and Chignik's current run strength issues are 'mother nature' problems. One of the lakes in that system is silting in so the carrying capacity of the two lakes has been diminished. That is why their run strength has been weaker in recent years. The Cape Igvak section hasn't even been open prior to July 8th recently.

Sincerely,

Robert Fellows



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

The current management plan has been successful in keeping the allocation of catch to 15%. In years of low escapement, it completely shuts down effort in the Igvak area, putting significant conservation burden on the KMA fleet. This plan effectively redistributes the allocation and does not address conservation or management. It will not improve Chignik stocks and will complicate management of the fishery.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

This proposal is not based off historical data. I feel it is a last ditch effort to point blame for a few years of poor escarpment.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

December 24, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 Re: Opposition to Proposal 58 Dear Chairman Morisky and Board of Fisheries Members, I am Steve Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Grace. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures. This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen. The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before any fishing at Igvak occurs. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state. If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak. The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits. I ask that the Board reject this proposal and not make any changes to the Cape Igvak Management Plan. Thank you for your careful consideration, Steve and Jenny Roth F/V Sea Grace Homer, Alaska



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

My family and I are set gill net fishermen in Kupreanof Strait, which is in the Central Section of the Northwest Kodiak District. Kupreanof Strait flows into Shelikof Strait. The 2020 season will be my 43rd season fishing in the same locations. Gill net and seine gear types are not managed separately by ADF&G. Restrictions or closures in the Mainland Sections of the Kodiak Management Area will only result in increased seine effort in the Central Section. This will further facilitate potential conflicts in gear types in an area that already has enough competition between the gear types allowed. This proposal will be highly detrimental to the set gill net fisheries, which are barely able as it is to make a living.

Tollef Monson

12/25/2019 06:51 PM AKST



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RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

This is not good management policy/



Tyler-Rose Hoffman
PO Box 1212
Kodiak, AK 99615

12/24/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 58

Dear Chairman Moriskey and Board of Fish members:

I live in Kodiak and my husband and I operate a commercial fishing business. We rely on salmon for the bulk of our income, though we also participate in halibut, sea cucumber, and cod fisheries. Our ability to stay in Kodiak depends on the health of the Kodiak salmon fishery. I respectfully request the Board reject Proposal 58.

Despite the implications of this proposal, the Cape Igvak management plan was put in place not as charity to Kodiak fishermen, but as a limit on a traditional Kodiak fishery. The plan has been repeatedly evaluated by the Alaska Board of Fisheries and the close scrutiny has resulted in no major changes to the plan. The current plan already assures both the conservation and economic concerns of both areas are addressed by preventing Igvak from opening until 300,000 sockeye have been harvested in Chignik.

The Kodiak Salmon Management plan is good as it is and I see no need for any changes to it. Thank you for the opportunity to comment on the proposals before the meeting. As always, I look forward to visitors getting to enjoy our great town and vibrant fishing community.

I humbly request the Board reject Proposal 58.

Sincerely,

Tyler-Rose Hoffman
F/V Relentless



December 24, 2019

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

Re: Opposition to Proposal 58

Dear Chairman Morisky and Board of Fisheries Members,

I am William Roth, Captian of the F/V Sea Chantey. I own a Kodiak seine permit and have been fishing it for the lasat 5 years as well as working as crew since 2010, I rely mostly on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

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I ask that the Board reject this proposal and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
William and Kaytlen Roth
F/V Sea Chantey
PO BOX 1230
Homer AK
99603



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

I believe this proposal is going to have a negative impact on me and accomplish nothing. My name is Aaron Nevin. Being born in Kodiak to a commercial fisherman father I grew up fishing salmon on his seiner. I have continued on in my currently twenty year long career to buy a permit and run his boat after retirement. The seining season usually accounts for the majority of my annual income and is incredibly important to my family.



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Dear Board of Fish Members, I am a second-generation Kodiak fisherman. My father started salmon fishing here in 1967, and I have setnetted since I was a toddler with my family, for my whole life. I took over the permit from my dad several years ago, and in 2016 finally bought the setnet operation from my parents outright. You may be wondering why a setnetter who has no ability to fish the Igvak area is even commenting on this proposal. This is because we are drastically affected by the mobile seine fleet. If they are limited in where they can fish, we find our central section of the Northwest Kodiak district becoming more and more crowded with fewer opportunities for all to harvest in the traditional manner. So it behooves me to pay attention and understand what's going on. In asking to modify the definition of the total Chignik sockeye salmon catch used to determine allocation, Chignik is essentially arguing the opposite that they argue at Area M meetings when they say that the fish in the western part of Area M are bound for Area M. It appears now that they are saying the opposite. And then we note that there isn't any new information here. How can what can be counted as Chignik Sockeye be changed based on no "new information?" As a lifelong fisherman with a previous generation of history in my consciousness, I have to add that climate change and the warming of the oceans and ocean acidification is something we are coming up against. Changes are happening and I feel like they are going to keep happening. For this reason I urge you to be very cautious and careful about changing management plans in response to fisheries "disasters." Who knows what disasters will happen next and if you build management plans in response to these rather than based on deep analysis of science and the history and all other elements of the proposal, you'll be setting dangerous precedents for your future decisions. Thank you for your consideration, Adelia Myrick