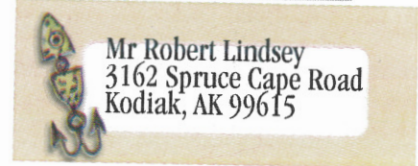


Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615



December 12, 2019

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

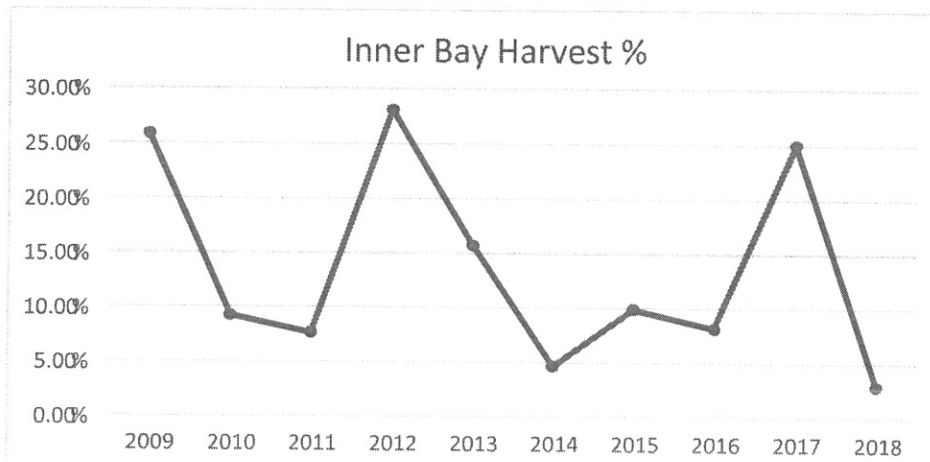
RE: **Oppose Proposal 71**

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association is writing to express our **opposition to proposal 71**, which would close traditional seine-only fishing areas, reduce overall yield in the Kodiak Management Area (KMA), entirely prevent the harvest of early chum stocks in the inner bays, and would disproportionately impact smaller seine vessels. This proposal would eliminate early season fishing opportunities in inner bays, which occur well before peak run timing but can nevertheless be very productive on years of strong runs.

The early test fisheries conducted in the inner bays occur well before traditional peak run timing and provide accurate gauges of run strength without imperiling local stocks. Typical openings on July 6 and 13 occur well before significant numbers of fish have entered the streams. Lack of fish in freshwater means that test fisheries are the only viable way for the department to gauge run strength early in the season. This means that the requirement that the department be assured that escapement objectives will be achieved before *any* openings in these areas will preclude the prosecution of any of the traditional early fisheries in the inner bays. Additionally, early chum harvests in Terror, Uganik, Zachar, and Spiridon bays occur well before significant volumes of pink salmon have entered the streams and adoption of this proposal would all but eliminate these fisheries.

There are currently no prevailing escapement problems that will be solved by the adoption of this proposal as the current management plan has proved sufficient at securing NW Kodiak district escapement through selective closures of the inner bays and the central section. On years of relatively low abundance of pink and chum salmon, such as 2014, 2016, 2018, negligible harvest occurs in these areas during the test fisheries. In fact, on these years, of the total harvest of pink salmon in the Northwest Kodiak District, an average of roughly 5% of fish caught came from the inner bays, and most of this harvest occurred during the peak portion of the run while the central section was also open. A graph below depicts the percent of pink salmon harvested in the inner bays as a total of the central section harvest.



This proposal would eliminate large early harvests of pink and chum salmon on years of high abundance such as 2012, 2017, and 2019. The primary outcome of this proposal would be to reduce yield in the KMA without providing any additional conservation benefits. This proposal will negatively impact harvest in the KMA without fixing any existing problems.

The Board should also consider that the inner bays provide seiners some respite from dangerous weather conditions in the outer areas of the central section. Inclement weather events are increasingly more frequent in Kodiak and the inner bay fisheries provide a critical safe harbor fishery for the fleet in areas free from gear conflict. Kodiak is not a super-seiner fishery like those found in Southeast Alaska and Prince William sound, and a very high percentage of vessels operating in the area are old, smaller seiners ill-equipped for rough weather conditions. The adoption of this proposal would disproportionately impact Kodiak's small boat fleet.

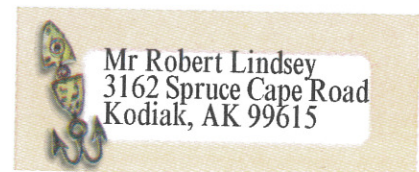
The current management plan has proved effective at ensuring adequate escapement in inner bays while providing for maximum sustained yield in the NW Kodiak district. KSA therefore respectfully requests the Board **reject proposal 71**. We thank you for the opportunity to comment on behalf of the membership 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 Seinners Association is comprised of 107 active SO1K seine permit holders, in addition to local Kodiak and Homer 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.

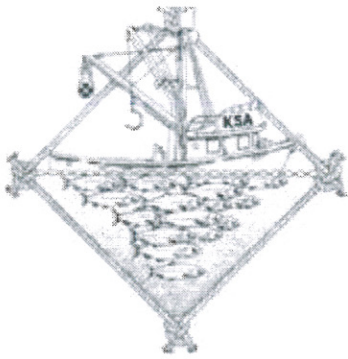
Respectfully,

in full agreement -

Nate Rose
KSA President



SO1K 55880V



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: Oppose Proposal 66

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association respectfully requests that you **reject proposal 66**, which intends to impose arbitrary, onerous, and draconian harvest caps on sockeye caught in the Kodiak fishery. This proposal clearly disregards the reality of our fishery and perpetuates a fantasy world in which the entire universe is to be regulated based on the demands of the Cook Inlet drift fleet. The adoption of the proposal would require the Board to essentially eliminate the Kodiak area management plan and to ignore virtually every guiding principle that is used to direct Board policy ranging from Article VIII of the Alaska state constitution to the sustainable salmon policy and the mixed stock fisheries policy. We do not consider this to be a serious proposal and we hope that the Board will succinctly reject it.

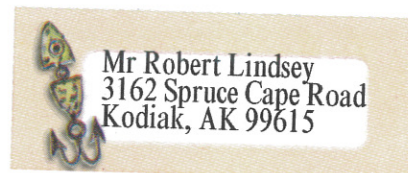
Please see our comments on other proposals addressing mixed stock harvest in Kodiak and concerns about the harvest of Cook Inlet stocks. Thank you for your time.

Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, local Kodiak and Homer 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,

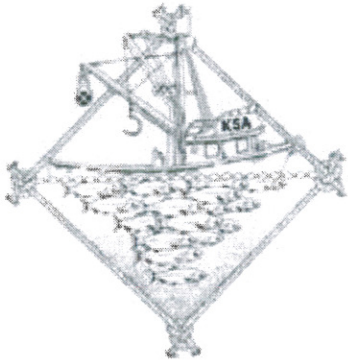
in full agreement.

Nate Rose
KSA President

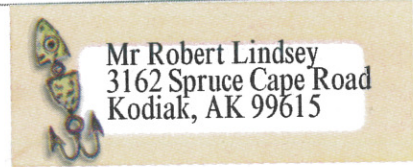


*SO1K 55880V - Permit earned by points
by my father*

*(I was too young at age 12 in 1973)
But I was there since age 8*



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 65

Dear Chairman Morisky and Board of Fish Members:

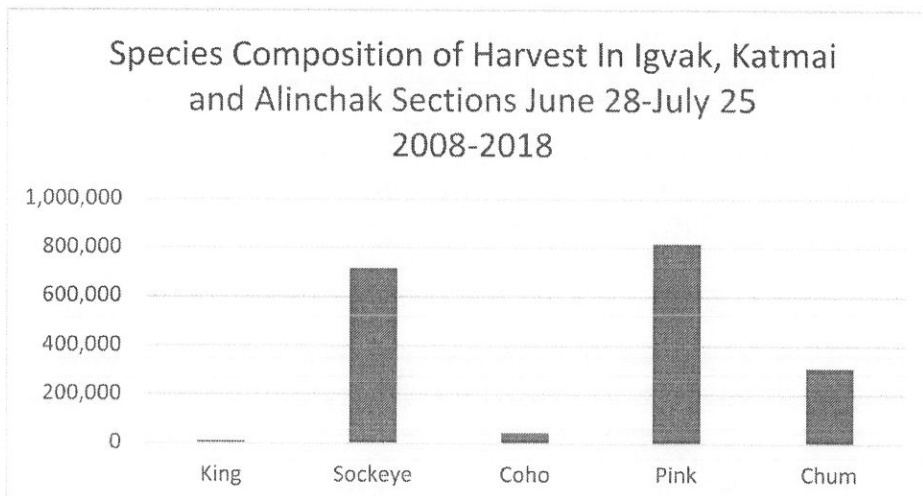
The Kodiak Seiners Association (KSA) is writing to express our **opposition to proposal 65**, which is designed to eliminate long-standing, traditional fisheries in the southern portion of mainland district of the Kodiak Management Area (KMA).

This proposal intends to eliminate a fishery that is already the most restrictively managed in the Kodiak area. While the proposal applies to the time period from June 28 to July 25th the Board should be aware that there is no fishery prosecuted in this area from June 28th until July 6th when the first of a maximum of four 57-hour openers occur in the Katmai and Alinchak bay sections of the mainland district. During this period other districts on the island are traditionally permitted 105-hour extendible fishing periods, while the mainland district cannot be extended regardless of local stock abundance. The Board should be aware that predominantly local pink and chum salmon are harvested in the area of concern for proposal 65 during the period of time that the proposal would apply.

Some of the most prolific pink and chum runs in the mainland district are located here, and the current restrictions in the management plan already provide insufficient opportunity to harvest these stocks. The chart below shows the cumulative harvest of each species in the Cape Igvak, Alinchak Bay, and Katmai bay sections¹ of the mainland district from 2008-2018. Pink and Chum salmon account for roughly 60% of fish harvested in the region during dates under consideration, while sockeye harvest only amounted to 36% of the total. During some years, harvest of pink and chum salmon, all likely of local origin, comprised up to 73% of the catch in this area. The Cape Igvak section, which is managed exclusively for Chignik bound sockeye during this period, only produced a sockeye harvest rate of 37%. Because the genetic stock analysis focused exclusively on sockeye salmon, the resulting public response to it neglected to account for the multispecies nature of our

¹ On some years fewer than 3 vessels made deliveries in some districts, so that data is confidential and not included in the tabulation.

fishery and the prevalence of pink, chum, and silver runs in the southern portions of the mainland district.



The Alaska Board of Fisheries is obligated to use the best available science to make management decisions, and KSA understands that this standard means that the genetic stock assessment of sockeye salmon harvests in the Kodiak Management Area (KMA) can be used in its analysis. Nevertheless, if the Board is going to use this study and its scientific basis then the principle conclusions of the study cannot be ignored. Among the primary findings is that the harvest of nonlocal stocks is highly variable and unpredictable, and that harvest data cannot be extrapolated temporally or geographically.

This proposal makes the mistake of projecting conclusions onto areas for which no data is available. Additionally, the proposer confusingly argues that the lack of local sockeye streams in the area means that KMA stocks of origin aren't caught here, while simultaneously and contradictorily asserting that CI stocks, which also obviously do not originate from streams in the south mainland district, are the only source of sockeye harvest in the region. The Board should be aware that no genetic data is available in this region outside of the Cape Igvak area, and that local stocks, especially late Karluk stocks, are known to migrate north up the mainland district before crossing the north Shelikof straight and heading south back down to Karluk.

The genetic stock assessment at Cape Igvak is the most limited of all areas sampled during the middle strata. There was no fishery conducted in the area in 2014, and harvests were limited in 2015 when an estimate of a mere 3560 CI sockeye taken in the Igvak section. Harvest rates in 2016 were abnormally high, and should not be considered as representative of typical fishing patterns. In fact, the contrast between harvests in 2015 and 2016 should give the Board plenty of pause before drawing any conclusions about the predictability of sockeye migration paths the KMA.

Although the harvest of CI sockeye in the Kodiak area in 2015 was by far highest of the three years covered in the genetic survey, these fish were almost entirely absent from the Cape Igvak area this year. The following year's unusual harvest of CI stocks in the Cape Igvak area demonstrates the extraordinary unpredictability of these fish. There is clearly no demonstrable harvest pattern of CI stocks, and the catch of 2016 is definitively an anomalous event that should only be taken as a

cautionary tale about the erratic uncertainty of CI sockeye migration paths. In other words, the harvest at Cape Igvak that year is indicative of what *can* happen with CI stocks at any place or any time in the KMA, and it *just so happened* to occur at Igvak that year. Igvak is already managed under strict harvest caps so that the high harvest rates immediately led to a closure of the area and thus the direct conservation of these stocks, indicating a responsibly functioning management plan that we currently have in place.

The unpredictability of salmon migrations and the need to preserve historical fishing communities while providing opportunities to harvest local stocks is the very reason why the Board long-ago adopted the Mixed Stock Fisheries Policy. It is understandable that some groups may believe that the harvest of CI fish in Kodiak is somehow unfair, however, the attempt to characterize our fishery entirely based on the CI component of our harvest is both dangerous and misguided. This proposal is asking the Board to entirely ignore the Mixed Stock Policy, discard the best available science, disregard and discount the preponderance of local stocks, and violate virtually every basic guiding principle and policy, including constitutional mandates on the utilization of fishery resources. This proposal would inflict certain and severe economic hardship on KMA fishermen, upend decades of responsible fishery management, and entirely erode confidence in the regulation of our fishery. It would do all of this simply and speculatively to provide more fish to a region that currently appears incapable of fully exploiting their local stocks.

KSA respectfully requests the Board to reject **proposal 65**. 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.

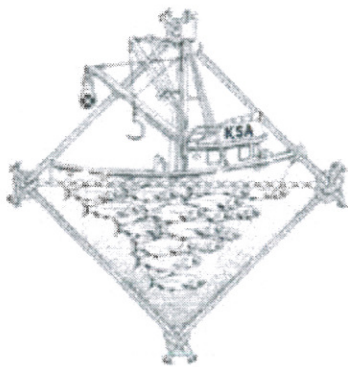
Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, in addition to local Kodiak and Homer businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADF&G, the Board of Fisheries, and our State Legislature.

Respectfully,



Nate Rose
KSA President

I am in full agreement, Job Luby
SO1K 55880V, Earned by points by
my father



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615



Mr Robert Lindsey
3162 Spruce Cape Road
Kodiak, AK 99615

December 24, 2019

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

RE: Oppose Proposal 64

Dear Chairman Morisky and Board of Fish Members:

Thank you for the opportunity to comment on **Proposal 64**. The Kodiak Seiners Association (KSA) respectfully requests you **oppose proposal 64**, which intends to impose onerous and arbitrary restrictions to our commercial fishery through the creation of "seaward" and "shoreward" harvest zones in the mainland district of Kodiak.

This proposal represents and perpetuates an amalgamation of misconceptions concerning the salmon fishery in the Kodiak Management Area (KMA). First and foremost is the implication that Kodiak currently bears no burden of conservation of Cook Inlet (CI) stocks and that we are essentially operating in the absence of regulations that substantially restrict harvest. The North Shelikof Strait Management Plan was established with the intention of annually limiting the harvest Cook Inlet bound sockeye regardless of run strength. This means that on years of abundant CI stocks higher harvest rates trigger early closures of the seaward zones which then remain closed until July 25th, depriving the fleet of substantial fishing opportunity in an effort to conserve a fishery that is chronically under-harvested while also inhibiting the harvest of our local stocks.

Additionally, the Mainland District, which includes the Cape Igvak section, is the most stringently managed area in the KMA during the time of consideration for this proposal. Kodiak fishermen are only allowed a maximum of four 57-hour openings in the mainland district before August 1st. These openings cannot be extended regardless of the abundance of local and non-local stocks. The Wide Bay section does not open before July 25th, and it is not unusual for the Cape Igvak section to remain closed until July 25th as well, long after the peak of the late Chignik and Cook Inlet sockeye runs. There is no other district in the KMA that is so rigidly managed during this time frame, and the current management structure already provides insufficient opportunity to harvest local stocks.

The Board should also consider that the structure of the Cape Igvak management plan inherently acts to conserve CI stocks on the rare occasion that they are harvested there. Although the harvest

allocation for Igvak is set according to measures of abundance in Chignik, the harvest of any stocks counts against that allocation and will trigger a closure. Consider the anomalously high harvest rates of 2016. An abundance of what we now know were Cook Inlet stocks that were perplexingly swimming westward led to unusually high harvest rates, quickly triggering a closure of the Cape Igvak area which then remained closed for the rest of the season. Kodiak fishermen are always operating under strictly imposed harvest quotas at Igvak and these harvest caps apply regardless of the stock composition. For that reason, Igvak especially and the rest of the mainland in general are currently managed under a structure that provides maximum safeguards to CI stocks and minimal opportunities to harvest local stocks while prosecuting our traditional fishery.

Another glaring falsehood stated in this proposal is the claim that the KMA only has 7 streams with sockeye present. Kodiak has, in fact, 15 un-enhanced streams that are common sources of commercial harvest in addition to 4 major enhancement systems with associated terminal harvest areas. There are additionally numerous other minor wild systems and subsistence enhancement projects that contribute to mixed stock sockeye harvest in the KMA. A list of important sockeye systems that contribute to mixed stock harvest throughout the KMA is provided below:

Non-Enhanced (Wild) Systems	Enhanced Systems
<ol style="list-style-type: none"> 1) Karluk 2) Ayakulik 3) Frazer 4) Upper Station 5) Dog Salmon 6) Saltery 7) Pasagshak 8) Buskin 9) Litnik 10) Pauls Bay 11) Discovery Bay 12) Thorsheim 13) Malina Creek 14) Uganik 15) Kafliia 	<ol style="list-style-type: none"> 1) Spiridon 2) Kitoi 3) Foul Bay 4) Waterfall Bay

Typical aggregate escapement numbers for these systems exceeds 1.5 million sockeye annually, and enhancement projects can contribute hundreds of thousands additional sockeye for harvest. These fish are widely distributed in the KMA both geographically and temporally, and sockeye bound for KMA systems are harvested throughout the season and in all districts, including the mainland district. It is unclear how the proposer concluded that Kodiak has only 7 sockeye runs only 2 of which are “of minor production status.” In reality, 9 of Kodiak’s rivers have weirs counting sockeye, and aerial surveys are common for numerous other systems, like Uganik.

It is our hope that the Board understands that the majority of sockeye harvested in Kodiak are of local origin and that our fisheries are responsibly prosecuted as directed harvest of local stocks of sockeye, chum, pink, and coho salmon along with our historical and traditional harvest allocation at Igvak.

One of the most frustrating gaps in the greater public understanding of the mixed stock fishery in Kodiak is that we are prosecuting a mixed-stock, multi-species fishery. The recent publication of the genetic stock assessment focused public attention exclusively on the sockeye component of commercial harvest, while neglecting to provide harvest figures for the non-sockeye portion, which comprises the vast majority of fish harvested in Kodiak. For example, sockeye made up only about 6% of the fish harvested in the KMA in 2019, and even in July, during the period of concern for this proposal, Kodiak harvest was overwhelmingly pink and chum salmon. Efforts to curtail the harvest of sockeye in Kodiak, especially CI stocks which exhibit no predictable migration patterns in the KMA, would inevitably result in significant collateral damage in the form of lost harvest of local, pink, chum, and coho stocks that are largely the focus of our directed fishery.

This very situation highlights the fundamental reason why the Alaska Board of Fisheries adopted a mixed stock fisheries policy. Migrating salmon do not conveniently segregate themselves by species and stocks of origin, and they do not embark on predictable migration paths far away from their natal streams. As a result, non-local mixed stock harvest of salmon is inevitable in all Alaskan waters and attempts to manage our fisheries in order to somehow distill out non-local components will inevitably result in sub-optimal use of the resource.

The Mixed Stock Fisheries policy and its associated findings resulted from the acceptance that Alaska must manage its fisheries in a way that best complies with Article VIII of the Alaska state constitution which declares that, “Wherever occurring in their natural state, fish...are reserved to the people for common use” and that fishery resources be “utilized, developed and maintained on the sustained yield principle” and finally that uses of the resource is available for “maximum use” and for the “maximum benefit” of Alaskans.

The purely allocative proposals offered to the Alaska Board of Fisheries for this meeting would inevitably result in reduced yields of local stocks in addition to massive disruption of a long-established traditional fishery. If the Board were to apply the same reasoning presented in this proposal to management regimes throughout the state, then the net result would be to forsake the sustained yield principle as well as other constitutional statutes and Board policies. The uniform application of the reasoning found in Proposal 64 would inflict substantial economic losses for the state and most acutely for Alaska’s coastal fishing communities. Ultimately, managing our fisheries for the maximum benefit and sustained yield standards means that we must accept that the unpredictable nature of salmon migration negates the unrealistic standard of purely localized harvest.

Although some user groups may lament the faraway harvest of what they consider to be *their stocks*, the policies that allow for this harvest were crafted with immense consideration of how to develop consistent management plans that when universally applied maximize the use of the resource and the benefit conveyed to Alaskans. Although it may seem intuitive to some that it is somehow inherently unfair for Kodiak fisherman to harvest Cook Inlet stocks, the Board should consider whether it would be fair for those same fishermen to sacrifice the harvest of hundreds of local fish

in order to potentially provide Cook Inlet waters with a single additional salmon from chronically under-harvested stocks.

Ultimately, Alaska's fisheries are dedicated for common use, and wholesale regional entitlement, which is asserted in this proposal, would violate the very foundational principles of our constitution. Although KSA strongly believes that subsistence users should be granted ultimate priority, there would be no value conveyed to the state by attempting to disrupt a historical fishery just to alter the geographic location of commercial harvest. There are no Board policies or legal statutes that direct managers to ensure commercial harvest be focused exclusively in the region of natal streams. As long as an established commercial fishery alone does not intrinsically threaten the biological sustainability of stocks or the ability to provide subsistence harvest opportunities, then that fishery should not be disrupted simply to regionally reallocate commercial harvest.

Additionally, the Board should consider the importance of consistency in the application of their policies. Currently, Kodiak fishermen bear the sole burden of conservation of KMA stocks despite the documentation of substantial harvest of "East of WASSIP" stocks in Chignik and further south. While KSA is strongly ideologically opposed to meddling in the management of fisheries in adjacent areas, we also believe that whatever standards are applied to our fishermen must also be applied for our fishermen so that any further restrictions on harvest in the KMA designed to prevent the catch of non-local stocks must be coupled with restrictions to the south designed to prevent the unregulated harvest of KMA and Cook Inlet bound stocks in the Chignik management area and wherever else these fish may be present. After all, the legitimacy of the Board's reasoning is critically and inextricably dependent on the consistency with which its policies are applied.

KSA respectfully requests that you **oppose proposal 64** and support the responsible application of the Mixed Stock Fisheries Policy in Kodiak. We believe that adopting this proposal would result in substantial and irreversible economic harm to our fleet and the economy of communities of Kodiak and that the spirit and intent of the proposal are in complete violation of the state constitution and other adopted Board policies.

Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, in addition to local Kodiak and Homer 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,

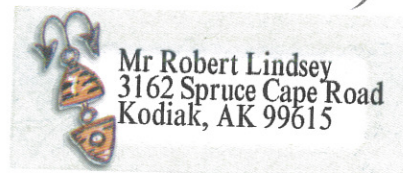


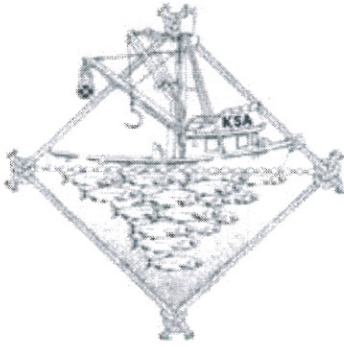
Nate Rose
KSA President

IN FULL AGREEMENT

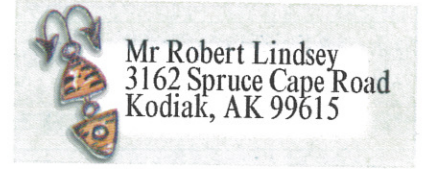


SO1K55880 V
SO1K 62045 G





Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615



December 24, 2019

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

RE: Opposition to Proposal 63

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association (KSA) is writing to express our **opposition to proposal 63** which creates “seaward” and “shoreward” harvest zones in the mainland district of the Kodiak Management Area (KMA) with the intention of preserving king salmon bound for Cook Inlet waters. KSA recognizes the scarcity of King Salmon in the Western Gulf of Alaska, and we understand that these circumstances call for extreme management measures in order to preserve stocks with critically low populations. With this in mind, we endorse and encourage the continuation of the non-retention policy for king salmon in Kodiak waters. This policy has now been in place for 6 seasons and amounts to an extraordinary and unusual conservation practice that our fleet has willingly accepted.

Proposal 63 relies on fundamentally flawed assumptions about the harvest of king salmon in Kodiak. There is no evidence to suggest that king salmon are harvested in greater abundance in the Seaward Zones, and in fact, feeding kings typically accumulate further into bays where they prey on herring, capelin, and other schools of baitfish. These salmon, colloquially termed “feeders” have particularly high mortality rates when released due to scale loss. Feeders comprise the majority of king salmon harvested in Kodiak, and adoption of proposal 63 would likely intensify the harvest and mortality of king salmon in the KMA. Forcing the seine fleet into “shoreward zones” is therefore a counterproductive approach to conserving king populations and it entirely lacks a sound scientific basis.

The Board should also be aware that the area under consideration for proposal 63 is already the most restrictively managed seine area in the KMA. There are no general openers allowed in the mainland district in June, and in July a maximum of 4 non-extendable 57-hour openers are allowed. It is not unusual for the Cape Igvak section to remained entirely closed before July 25th, and the Wide Bay section cannot open before July 27th, despite prolific pink and chum runs in the area. Under the current management plan our members already consider fishing opportunities in the mainland district to be insufficient, particularly on years of abundant early pink and chum salmon returns, when high

harvest rates and escapements still don't allow for extensions of fishing time during July. The Board should consider the conservation burden inherent in imposing weekly 111-hour closures in this area.

KSA strongly believes that conservation measures are most effective in the vicinity of the natal streams of concerned stocks. This fact become most apparent when analyzing the content of Cook Inlet bound king salmon as a component of the overall harvest in the KMA. Kodiak harvested 7,723 kings last year out of a total harvest of 36,251,506 salmon. The genetic stock assessment of chinook in the KMA determined an average harvest rate of 3.6% Cook Inlet origin stocks. This means that only one out of every 130,388 fish harvested in the KMA is the intended conservation target of this proposal 63.

There is absolutely no factual basis to believe that the areas covered by this proposal exhibit consistently high harvest rates of Cook Inlet chinook stocks, and given that the catch of chinook is typically random and evenly diffused throughout harvest in the KMA, the Board can expect that every chinook preserved by this plan will result in the unintended harvest loss of at least tens of thousands of salmon of various species from healthy stocks. Unless there are absolutely no other management measures that can be taken in the vicinity of the runs of concern, it would be entirely unjustifiable to enact a management plan that has such immense and certain costs without conveying any measurable benefits.

KSA also believes that Board policy must be applied consistently throughout the state. If the current Board wishes to engage in such a drastic policy shift that it would begin adopting additional measures to further limit the harvest of non-local stocks in Kodiak then we would expect and anticipate these standards to apply to regions to our south, such as the Chignik Management area, where there are currently *no* measures in place designed to limit the harvest of non-local stocks. The Kodiak seine fleet has had to bear the sole burden of conservation for our local stocks in addition to the conservation burden of non-local harvest inherent in the Cape Igyak and North Shelikof Straight management plans. Salmon management in the Western Gulf of Alaska already exhibits an inequitable distribution of the burden of conservation due to the uneven applications of Board policies. Kodiak fishermen have been resultantly held accountable for non-local harvest while our own stocks are apparently considered unworthy of similar concerns when harvested in other management areas.

KSA acknowledges the current scarcity of king salmon in the western gulf, and we accept that commercial fishermen have an important role to play in the conservation of these fish, however it is our hope that the BOF understands and openly acknowledges that the current state of scarcity of GOA chinook was not caused by longstanding commercial fisheries and that unusually high and accounted ocean mortality rates are driving the population decline.

Without knowledge of what is causing the scarcity of king salmon, but with an understanding that minimal volume of Cook Inlet origin king salmon is caught in the KMA, it is important that the public temper its expectations of conservation potential within the Kodiak area. Although some individuals may express resentment of the harvest of any kings in Kodiak, it is important that conservation measures are designed to be effective instead of merely punitive. You cannot use management measures in the KMA to conserve fish that Kodiak fishermen simply aren't catching.


KSA respectfully requests the Board **reject proposal 63**. 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 is comprised of 107 active SO1K seine permit holders, in addition to local Kodiak and Homer 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,



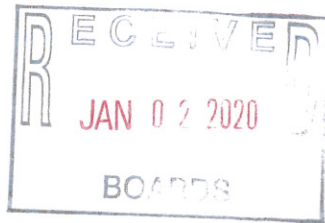
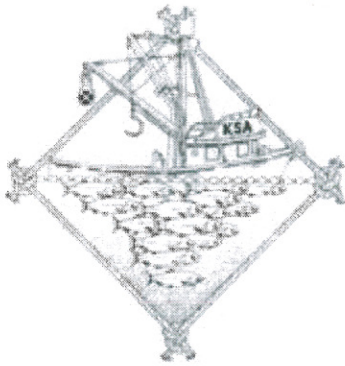
Nate Rose
KSA President

I AM IN FULL AGREEMENT 

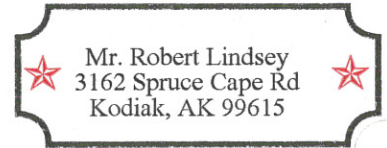
SO1E 62045 G
SO1K 55880V



Mr Robert Lindsey
3162 Spruce Cape Road
Kodiak, AK 99615



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: **Oppose Proposal 62**

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association is writing to express our **opposition to proposal 62**. To be absolutely clear, our contention with this proposal is founded in the underlying insinuation that Kodiak fishermen are dishonest and lawless swindlers. This proposal is at its core a direct insult to our fishermen and its premise is entirely preposterous. There has never been a single reported incident of Kodiak fishermen intentionally mis-reporting harvest at the Cape Igvak area, nor have any of our members ever heard of anyone committing such a scheme. When this proposal was submitted in 2017 Board of Fisheries meeting the Alaska State Troopers issued a public report that they had examined numerous vessels traversing the Shelikof Strait from the Cape Igvak area, and all of the fishermen had already delivered and properly reported their harvest.

The Board should be aware that the assertion of a "strong incentive" to misreport harvest at Cape Igvak is absurd. If fish harvested at in the Cape Igvak area were misreported as being harvested elsewhere, then those fish would not be allocated directly to the individual fishermen but instead to the whole Kodiak fleet. With an average of 53 boats annually participating the Cape Igvak fishery and 90% assignment rate of fish as "Chignik Bound", this means that the offending fishermen could reasonably expect to harvest 90% of 1/53rd of the fish that he/she misreports, which amounts to a mere 1.7% of the illegally reported delivery. To put this figure into perspective, if the vessel harvested 1000 fish, a pretty good delivery, the fishermen could only reasonably expect to gain a harvest of 17 fish by breaking the law, and this is only if there is subsequent opening in the Cape Igvak area.

Additionally, processors typically require vessels to deliver fish before traveling to and from the Cape Igvak area, with some requiring daily deliveries due to quality concerns related to long transport times between Igvak and Kodiak. Fishermen also tend to prefer delivering before leaving the Igvak area in order to avoid the cost of running refrigeration equipment over long travel periods and to prevent having to arrange tender service in other areas which would likely mean a sacrifice of fishing time. It is more cost effective and convenient for fishermen to deliver to a nearby tender in

the Igvak area and, and there is no way for the 17 out of 1000 fish incentive to possibly overcome the burden of delivering the fish elsewhere.

KSA would like to reassure the Board that Kodiak fishermen are honest and hardworking small business owners. We have no interest in conducting illegal scams to earn our living and just wish for a fair opportunity to sustain our fishing rights and continue the orderly prosecution of our fishery.

KSA respectfully requests the Board to **reject proposal 62**. 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 is comprised of 107 active SO1K seine permit holders, in addition to local Kodiak and Homer 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,

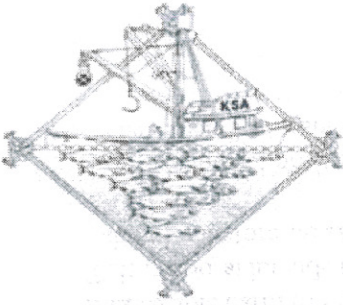


Nate Rose
KSA President

I AM IN FULL AGREEMENT, *Rob Lindsey*

SO1E 62045 G
SO1K 55880 V

★ Mr. Robert Lindsey ★
3162 Spruce Cape Rd
Kodiak, AK 99615



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: **Oppose Proposal 61**

Dear Chairman Morisky and Board of Fish Members:

Thank you for the opportunity to comment on Proposal 61 in advance of the Kodiak Finfish meeting. The Kodiak Seiners Association (KSA) respectfully requests you **oppose proposal 61**, which is an allocative proposal lacking merit based on an application of the allocation criteria.

Please see other comments submitted by KSA addressing allocation issues concerning the Cape Igyak area. This proposal would drastically reduce the likelihood of a fishery being prosecuted at Cape Igyak and would allocate salmon resources away from a fishery that is highly dependent on access to this area. Implementation of this plan would impose incalculable harm to the Kodiak fleet and would result in a further loss of vessels from the Kodiak management area. This proposal intends to put Kodiak fishermen out of business in order to guarantee extraordinary seasons to Chignik fishermen before we are allowed access to our historical fishing grounds.

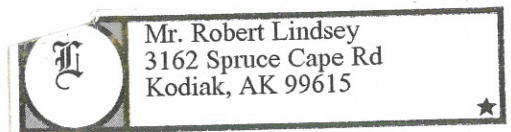
Kodiak's impact on Chignik's fishery has gone unchanged since the implementation of the plan and conservative management has resulted in Kodiak averaging 20% *below* our allocation of Chignik bound stocks. In contrast, Chignik fishermen are currently prosecuting an expanding mixed stock fishery that has negatively impacted the Kodiak area and provided for Chignik fishermen historically high harvests of non-local stocks. Any changes to the distribution of salmon allocation should start with restrictions to the intercept fishery in Chignik where fishermen have had to bear no burden of conservation for non-local stocks and where fishermen, due to the unregulated nature of their mixed stock fishery, have granted to themselves a greater allocation of the shared fishery resources.

KSA requests the **Board reject proposal 61**. 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.

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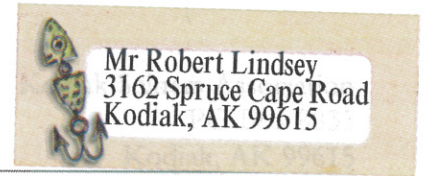
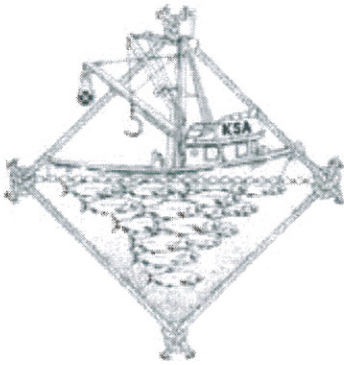
Sincerely,

Nate Rose
KSA President



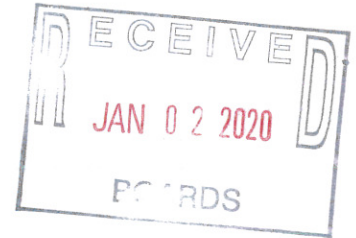
IN FULL AGREEMENT, *Bob Lindsey*

SO1E 62045 G
SO1K 55880 V



December 12, 2019

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



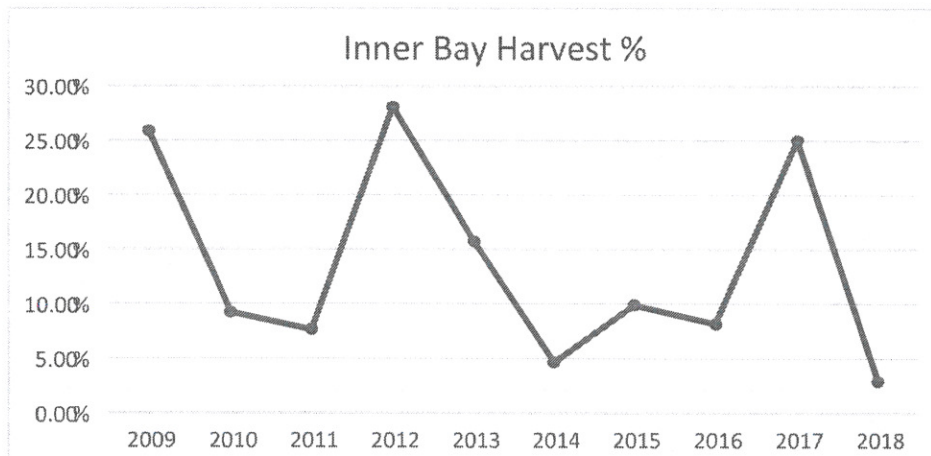
RE: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association (KSA) is writing to express our adamant **opposition to proposal 60**, which intends to reduce our longstanding historical allocation of sockeye salmon harvested in the Cape Igvak section of the Kodiak Management Area (KMA). Kodiak fishermen have harvested fish in this area since well before initiation of the limited entry program for salmon. The Cape Igvak management plan was initiated in 1978 and has been repeatedly scrutinized and evaluated including at the 2017 Kodiak finfish Board of Fisheries (BOF) meeting, at which a virtually identical suite of proposals was considered and rejected.

The durability of the Cape Igvak management plan is a testament to the care with which the plan was crafted and the success of its implementation. The plan includes both escapement and harvest requirements in the Chignik area before triggering an opening in the Kodiak area so that relatively poor years in Chignik such as 2018 and 2019 result in no fishery being prosecuted at Cape Igvak prior to July 25. On years of relative abundance of Chignik bound sockeye with a high harvest rates in the Chignik area, Kodiak fishermen are allowed access to the Cape Igvak area where up to 25% of total KMA sockeye harvest occurs. On particularly poor years in Kodiak, such as 2016, the Cape Igvak fishery provides a critical lifeline for Kodiak fishermen who have recently endured historically poor local pink and chum runs during even years.

The Kodiak fishery cannot accurately be categorized as “notably and exceptionally healthier” as is claimed in the justification language for this proposal. Early sockeye runs in Kodiak have followed similar trends of scarcity seen throughout the Gulf of Alaska. Fishing opportunities have been highly restricted in the Ayakulik, Alitak, and Karluk areas and recent early run sockeye harvests have been abysmal. When the Cape Igvak management plan was originally introduced, and as it has been continually re-analyzed and challenged, Kodiak fishermen had historically harvested far higher numbers of sockeye and were allowed significantly more fishing opportunities in these areas. Below is a graph of sockeye harvests in Kodiak since 1985. Claims of increasingly abundant harvests of



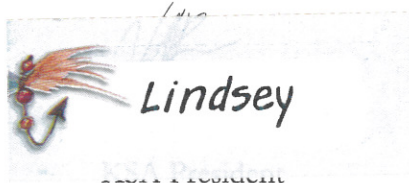
This proposal would eliminate large early harvests of pink and chum salmon on years of high abundance such as 2012, 2017, and 2019. The primary outcome of this proposal would be to reduce yield in the KMA without providing any additional conservation benefits. This proposal will negatively impact harvest in the KMA without fixing any existing problems.

The Board should also consider that the inner bays provide seiners some respite from dangerous weather conditions in the outer areas of the central section. Inclement weather events are increasingly more frequent in Kodiak and the inner bay fisheries provide a critical safe harbor fishery for the fleet in areas free from gear conflict. Kodiak is not a super-seiner fishery like those found in Southeast Alaska and Prince William sound, and a very high percentage of vessels operating in the area are old, smaller seiners ill-equipped for rough weather conditions. The adoption of this proposal would disproportionately impact Kodiak's small boat fleet.

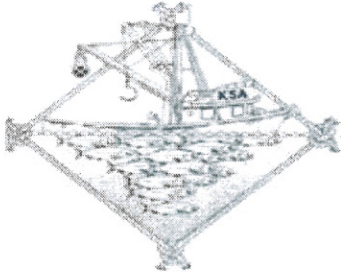
The current management plan has proved effective at ensuring adequate escapement in inner bays while providing for maximum sustained yield in the NW Kodiak district. KSA therefore respectfully requests the Board **reject proposal 71**. We thank you for the opportunity to comment on behalf of the membership 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 Seinners Association is comprised of 107 active SO1K seine permit holders, in addition to local Kodiak and Homer 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.

Respectfully, *in agreement completely,*



Robert B. Lindsey
Rob Lindsey



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 59

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association requests that you **reject Proposal 59** as it is written. This proposal, which has been repeatedly rejected by the Board of Fisheries including in 2017, is designed to conceal an allocation reduction of harvest in the Cape Igvak area, while proposing to fix a problem that doesn't exist. Kodiak fishermen have consistently averaged 20% *below* their allocation of Chignik bound sockeye as conservative management practices ensure that harvest overages are rare. Additionally, there is no indication that harvest overages in area M have ever led to overharvest in the Kodiak area. Area M fishermen are provided with a historical allocation of 6.5% of Chignik Bound fish, so that even if they were to harvest double their share, Kodiak's 15% percent allocation of the overage would only result in a temporary harvest goal that is less than 1% higher than it otherwise would be, which isn't nearly enough to overcome the typical 20% that the Kodiak fleet typically leaves on the table.

KSA hopes the Board understands the allocative implications of the change to the harvest equation in the proposal. Please see our comments on proposals 58 and 60 both of which address the allocative aspects of the fishery. This isn't an innocent "housekeeping" proposal but instead would result in significant loss of harvest opportunity in the Kodiak Management Area. If the Board finds cause to change the algebraic structure of how Kodiak's allocation is calculated in order to base harvest at Cape Igvak exclusively on harvest in the Chignik area then the new equation must be formulated to have no impact on the net sockeye allocation to the Kodiak fleet.

KSA respectfully requests the **Board reject proposal 59**. 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 is comprised of 107 active SO1K seine permit holders, in addition to local 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.

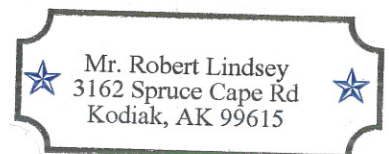
Sincerely,

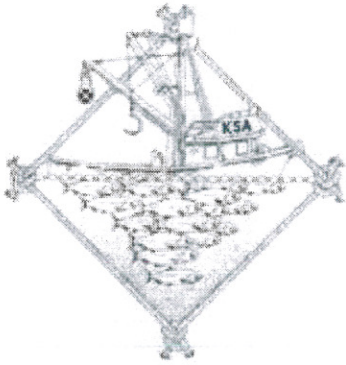
IN FULL AGREEMENT

Nate Rose, KSA President

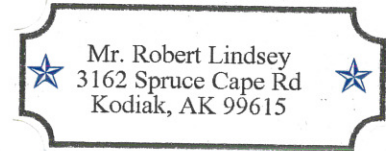
SO1K 55880 V

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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.

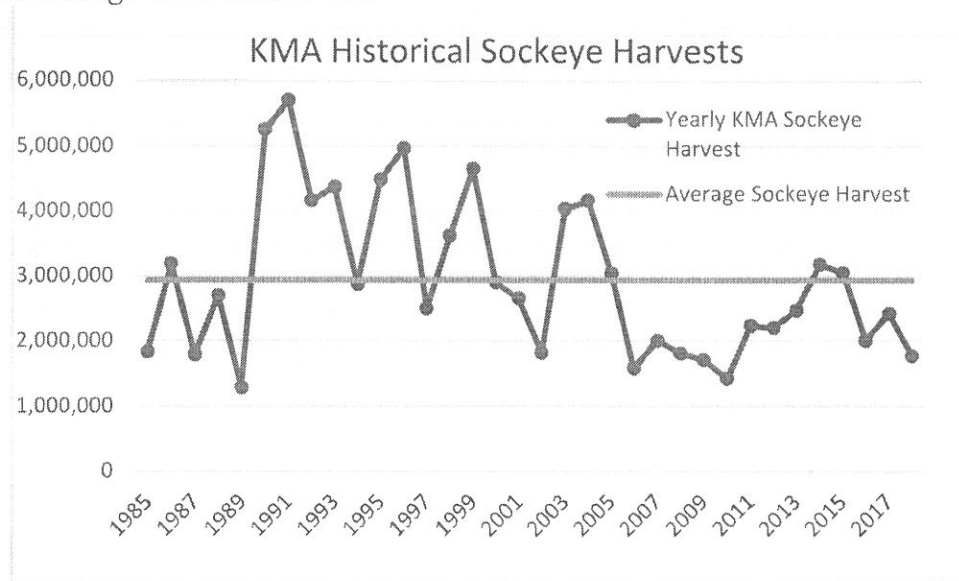
The Cape Igvak management plan was first adopted in 1978 and has been repeatedly evaluated by the Alaska Board of Fisheries, making it one of the most long-standing and intensely scrutinized management plans in the state. Repeated analysis through the application of the Sustainable Salmon Policy, the 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 gross inequity 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.


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Sincerely,

I AM IN FULL AGREEMENT 


Nate Rose
KSA President

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SO1E 62045G

 Mr. Robert Lindsey
3162 Spruce Cape Rd
Kodiak, AK 99615 