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Alaska Board of Fisheries Work Session | Anchorage, October 23-24, 2019

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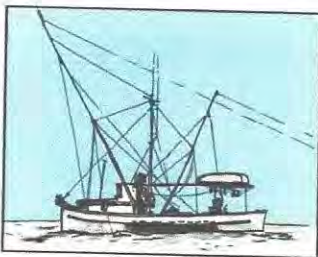
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Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
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October 8, 2019

Reed Morisky, Chair
Alaska Board of Fisheries
Juneau, AK 99801

RE: **ACR 1** - *Add the Crawfish Inlet Terminal Harvest Area and West Crawfish Inlet to waters that may be opened to a hatchery chum salmon troll fishery (5 AAC 29.112).*

Dear Chairman Morisky,

Alaska Trollers Association represents nearly 1700 commercial permit holders. Our fishery has been around for over a century and we have one of the highest Alaska resident participation rates in the State. Due to overall catch allocation declines, a segment of our fleet is increasingly dependent on the Crawfish troll-priority chum fishery.

We strongly support the Board taking up ACR 1 out of cycle, which would revise 5 AAC 29.112 to "Add the Crawfish Inlet Terminal Harvest Area and West Crawfish Inlet to waters that may be opened to a hatchery chum salmon troll fishery". This regulation change is sorely needed and an emergency in nature as witnessed by the unpredicted returns this year when the Crawfish chums remained outside the current regulatory fishable areas.

ACR 1 meets the third criteria for an ACR. It corrects "an effect in a fishery that was unforeseen". We appreciate NSRAA's initiative in addressing this problem, rescinded our similar proposal, and urge the Board's expedited consideration of ACR 1. Thank you.

Sincerely,

Amy Daugherty
Executive Director

RE: ACR 1 Add the Crawfish Inlet Terminal Harvest Area and West Crawfish Inlet to waters that may be opened to a hatchery chum salmon troll fishery (5 AAC 29.112).

All SE seiners and gillnetters will be bankrupt in 5 years if the SE hatcheries are closed. Please do not interfere with the existing hatchery system .



Southeast Alaska Fishermen's



PC003
1 of 1

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October 7, 2019

Board of Fisheries

Mr. Reed Morisky, Chairman

P.O. Box 115526

Juneau, AK 99811-5526

RE: ACR 1 – Add Crawfish THA and portions of West Crawfish to 5AAC 29.112 (allow chum salmon troll opening during coho closures)

Dear Chairman Morisky and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFa) supports NSRAA's proposal Agenda Change Request (ACR) 1 to allow chum salmon trolling in the Crawfish THA and West Crawfish during coho closures. The Crawfish hatchery chum return was recognized as a troll priority project both at the Regional Planning Team (RPT) and at the Northern Southeast Regional Aquaculture Association (NSRAA) board because of the current status of the Southeast Alaska Enhanced Salmon Allocation Plan. ADF&G in staff comments RC2 recognized that this fits the criteria as an unforeseen effect of a regulation.

SEAFa is a non-profit commercial fishing association representing our 330+ members involved in the salmon, crab, shrimp fisheries of Southeast Alaska and longline fisheries.

Sincerely,

Kathy Hansen

Executive Director



Tad Fujioka
214 Shotgun Alley
Sitka AK 99835

October 8, 2019

Alaska Board of Fisheries
Reed Morisky, Chair
Juneau AK 99801

RE: ACR #1-Support

I urge the Board of Fisheries to find that ACR #1 (to open more waters in the vicinity of the Crawfish Inlet hatchery release site to commercial trolling for chum salmon during the summer coho troll closure) meets the criteria to be considered out-of-cycle. Specifically, in 2018 when the BoF approved trolling during the closure in the Crawfish SHA it was expected that this would be the area where the chum would be the most concentrated. Instead, what occurred in both 2018 and 2019 is that during the coho closure, the chum staged in a large dense school in the deeper waters of the adjacent West Crawfish Inlet and did not proceed to the SHA until later. In both years troll catch rates in West Crawfish Inlet reached very high levels in the days immediately prior to the coho closure, and were also very high after the closure when the fishery subsequently reopened. This is described in more detail on page 2 of RC2 by ADF&G staff in their explanation that *ACR#1 does meet the out-of-cycle consideration criteria*.

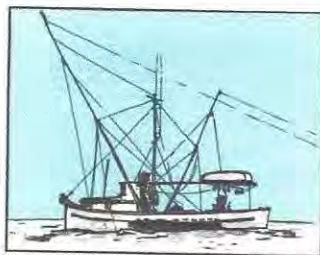
The justification for the entire Crawfish project was to increase the percentage of hatchery salmon caught by the troll fleet in accordance with the allocation set out in 5 AAC 33.365. However, with the troll fleet handicapped by the closure of the most productive waters in the Crawfish region during the peak of the run, it has been unable to meet that objective, and has actually caused the troll fleet to lose ground to the seine fleet.

It should also be mentioned that there have been some concerns raised regarding the health of nearby wild chum stocks due to excessive straying of Crawfish hatchery chum. (See ACR #2.) Maximizing troll opportunity in all waters where the Crawfish-bound hatchery chum are concentrated would help to address these concerns.

Furthermore, there is a case to be made that the practice of closing these waters (as well as the rest of the traditional troll grounds) to trolling for chum, sockeye and pinks during the coho closure is not in accordance with regulation. The August coho closure is described in **5 AAC 29.100 Management of Coho Salmon Troll Fishery. (b) (2)**. However, this section very clearly is specific to the *coho* troll fishery and does not mention closing troll fisheries directed at other salmon species.

For these reasons I encourage the Board to support consideration and ultimate passage of ACR #1.

Thank you,
Tad Fujioka



Alaska Trollers Association

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October 8, 2019

Reed Morisky, Chair
Alaska Board of Fisheries
Juneau, AK 99801

RE: **ACR2** - *Modify hatchery operations in Crawfish Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish.*

Dear Chairman Morisky and Board of Fish members,

Alaska Trollers Association (ATA) represents nearly 1700 commercial permit holders. Our fishery has been around for over a century and we have one of the highest resident participation rates in the State.

We oppose ACR #2. We do not believe the proponent has an adequate understanding of the rigorous process for permitting and managing a developing project and seems to have little regard for the integrity and professionalism of ADFG and NSRAA and the fishermen whose future depends on getting it right. The issues of straying and disease is taken very seriously by all responsible parties and measures have been taken and will be taken to address issues (as they arise) by those professionals whose lives have been devoted to these things and whose reputations and careers are at stake. ATA will not take up the proponent's mistakes point by point, leaving that to those professionals more qualified but focus on the question at hand, whether this proposal should be taken up out of cycle.

ACR #2 does not meet any of the 3 criteria for an ACR: 1) conservation purpose, 2) correct an error in regulation, and/or 3) correct an effect in a fishery that was unforeseen. **Most importantly, the ACR is outside the purview of the BOF.** The applicant acknowledges that the project went through the legal regulatory process, but does not like the outcome.

The State of Alaska set up a rigorous and open public process to apply for PNP hatchery permits, with a methodology to select local broodstock source & eggs (BOF authority 16.10440(b)), within a framework to minimize impacts to wild stocks; all of which are well documented in the PNP statutes and regulations. At the inception of the program, disease was a concern as it should be, but as past science-based papers and public comment submissions to the BOF by the State Fish Pathologist demonstrate common wild stock salmon diseases (i.e., BKD, IHNV) have not increased beyond background levels of the early 1970s. Medvejie Hatchery from which the Crawfish chum salmon originate has a clean bacterial and virology report in 2019 (see pathology report from Dr. Ted Meyers, state fish pathologist).

Many hatchery proposals and release sites are denied by ADF&G. For example, prior to Crawfish



Inlet being permitted NSRAA went through a rigorous process with ADF&G Sportfish and Commercial Fish Divisions to identify a location where wildstock interactions were minimal. SEAS, USAG, ATA, and SEAFA were usually represented at the RPT meetings where enhancement proposals are deliberated after they have been endorsed by PNP boards of directors.

As in many fisheries, temporal segregation of stocks is one facet of minimizing interactions. For example, the summer run chum 'index stream' in West Crawfish is temporally segregated from the later run timing Medvejie fall stock. Finally, the PNP associations (principally commercial fishermen) initiated the Hatchery-Wild Interactions research to better understand effects of straying. This long-term research began in 2012 and will not be complete until 2023.

Of significant concern to ATA and relevant to your decision on this ACR is the importance of this aquaculture project to our region and especially to Trollers. It would fly in the face of the architects of our Board of Fisheries Process if a proposal which might have such severe effects on local economies and the livelihoods of our fishing families were taken up in a venue which was restrictive of public participation.

Respectfully,

James Moore ATA President



October 7, 2019

Alaska Board of Fisheries
P.O. Box 115526
1255 W 8th Street
Juneau, AK 99811-5526

To Whom It May Concern:

I am writing in support of Alaska's salmon hatchery program. Commercial fishing in southeast Alaska, seining for salmon, is my sole income. We are invested with a permit, vessel powered skiff, nets, equipment and gear, et al. to nearly two million dollars. This is our life's work.

Do not support ACR 2. Currently, hatchery programs in southeast Alaska have benefited not only me and all commercial fishermen, but also sports, charter, and local businesses. It is a highly successful program that is working and our tax investment is helping to support this program as is. Please do not disrupt this working program. Allow those currently managing it to continue.

I do not think that ACR 2 meetings the proper criteria data-wise, just conjecture.

Thank you for lending this comment your full consideration.

Sincerely,

Bud Marrese
budmarrese@gmail.com

Submitted By

Clay Bezenek

Submitted On

10/8/2019 5:04:01 PM

Affiliation

Self

Phone

907-617-4785

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Ketch, Alaska 99901



PC007
1 of 1

As a member of the Pacific Salmon Commission Norther

Board members,

I'm writing to keep the statewide hatchery program running as, with no changes.

Our designers of this program saw the deficiencies with other states and provinces programs, and were able to address them from our onset. I'm proud to say, as a 36 yr commercial fisherman veteran, that we have the system we have.

Please don't let emotion or guessing change our system...only hard and fast science.

Thanks for your time



Alaska Department of Fish & Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

October 7, 2019

via email: dfg.bof.comments@alaska.gov

Re: Work Session October 23-34, 2019 (ACR 2)

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is opposed to ACR 2 for not meeting the criteria established by Board of Fisheries. This submission ignores selective facts regarding this particular fishery. Facts were presented and considered during the regulatory process through the Regional Planning Team and multiple divisions within Alaska Department of Fish and Game (ADF&G).

As presented, ACR 2 fails to establish a fishery conservation purpose or reason. Homogenization concerns of two stocks were considered through the regulatory process. There is a separation of stocks through run timing.

There is no error in regulation to correct. Current state regulations govern the hatchery permitting process. Those regulations guarantee a public process through the Regional Planning Team where a thorough review takes place before any recommendations are submitted to the Commissioner for consideration and potential approval.

There is no unforeseen outcome as a result of this regulation. The continued accusation regarding the regulatory process not being followed, or the accusation of consequences being ignored are both deliberate, and more attempts to change an outcome that is not agreeable to the proponent of ACR 2. All regulatory processes were followed and recommendations applied throughout the approval process.

The submission of ACR 2 is another attempt to discredit the hatchery program.

CIAA is dedicated to protecting and providing salmon for all user groups. We recognize the value of both hatchery and naturally produced salmon fisheries. We have reviewed ACR 2 and concur with the comments provided by the Northern Southeast Regional Aquaculture Association.

Respectfully,

Dean Day
Executive Director

Salmon enhancement today means better salmon fishing tomorrow.

RE: ACR 2 Modify hatchery operations in Crawfish Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish (5 AAC XX.XXX)

I am opposed to ACR 2. It does not meet the BOF criteria. The facts were presented and vetted by the BOF and ADF&G during the regulatory process. There are no errors in regulation to address nor any unforeseen outcome as a result of this regulation. The public process and review was done through the Regional Planning Team and those recommendations are submitted to the ADF&G Commissioner for consideration and possible approval. Approval of hatchery programs are based on strict genetic policies with little to no impact on wild stocks. ACR 2 is anti-hatchery propaganda that distorts the facts and misleads the public. Hatcheries are dedicated to protecting the wild stocks and provide salmon for all user groups by not only providing hatchery salmon but by increasing wild production through habitat protection, culling and eradicating invasive species, flow control structures, operating adult and smolt weirs, salmon rehabilitation projects, etc. I support Alaska's hatchery programs and the State should make sure these hatcheries are not hampered by misleading and unscientific proposals from people and organizations who are trying to unduly restrict or eliminate hatcheries. Hatcheries are a valuable self sustaining industry that provides thousands of jobs, tens of millions of salmon and tens of millions of dollars and billions of high protein meals. Thank you David Martin



Douglas Island Pink and Chum, Inc.

2697 Channel Drive • Juneau, Alaska 99801
(907) 463-5114 • www.dipac.net

To: Chairman Morisky and Board of Fish Members

Subject: Opposition to ACR #2 Hillstrand Crawfish Inlet.

Douglas Island Pink and Chum, Inc. (DIPAC) opposes ACR #2 as it does not meet any of the three criteria for an ACR, and because we believe the State's regulatory processes, which have been in place for over 40 years, work well to address hatchery issues as they arise.

The goal of Alaska's salmon enhancement hatcheries is to bolster state fisheries without adversely affecting wild salmon stocks. The permitting process for Alaska state salmon enhancement programs is extensive and thorough, supported by statutes, regulations, and the Comprehensive Salmon Enhancement Plan for Southeast: Phase III (CSEP III) dictating program implementation and operation with the objective being "...rehabilitation of the state's depleted and depressed salmon fisheries". Several key requirements for hatcheries were established to safeguard wild stocks, which include: hatcheries located away from significant wild stocks (AS 16.10.420), use of local brood sources (AS 16.10.445), management priority focused on wild stock protection (AS 16.05.730), tagging/marking of hatchery fish, and special studies on hatchery/wild interactions.

The primary organizational tool for enhancement programs are Regional Plan Teams (RPT) (AS 16.10.380; 5 AAC 40.300-370), the RPTs include stakeholders such as, salmon fishing gear groups, subsistence fishers, federal agencies, and ADF&G. These meetings are listed on ADF&G's website as well as emailed to a large list server, and are open to the public. The primary roles of an RPT is to "...initiate and continue an orderly process that examines the full potential of the region's enhanced salmon production capacity" (CSPE III). The RPT's are responsible for authoring a CSEP and adhering to its management strategy, which includes adaptive management that is "responsive to new knowledge and changing conditions". Moreover, the RPT ensures that hatcheries are operating in the best interest of the state's salmon resources and are aligned with fisheries management policies such as the Policy for the Management of Mixed Stock Fisheries for sustained yield of wild fish stocks, and sustainable salmon fisheries (5 AAC 39.220; AAC 39.222; and AS 16.05.730). Finally, the ADF&G Commissioner has direct authority to alter hatchery permits if in the best interest of the public or



wild stock health (AS 16.10.430; 5 AAC 41.040), and can further amend hatchery permit terms relating to fish and egg harvesting (AS 16.10.440(b)).

There is currently a comprehensive salmon study researching hatchery stray rates, proportion of hatchery fish in wild streams, and impacts on genetic fitness of wild stocks. The Alaska Hatchery Research Project is the most extensive and in depth research on hatchery/wild interactions of pink and chum salmon in Prince William Sound and Southeast Alaska. Private nonprofit hatchery operators urged the State to start this project, commenced in 2011, as a way to hopefully answer questions about how hatchery strays are affecting wild fish. Being stewards of a state resource, the operators want to be sure their production is not adversely affecting significant wild stocks of salmon. The study is expected to be complete in 2023 and the most up to date research results can be found on the ADF&G website

http://www.adfg.alaska.gov/index.cfm?adfg=fishingHatcheriesResearch.findings_updates

Northern Southeast Regional Aquaculture Association (NSRAA) is already working with ADF&G to address the high return rates of fall chum to the Crawfish release site, and both parties are well aware of hatchery strays moving into West Crawfish after the wild summer chum have come up the creek to spawn. ADF&G exercised their authority in 2019 using adaptive in-season management to limit straying into West Crawfish. The Crawfish release site is a new site and both ADF&G and NSRAA are working to ensure compliance with AK statutes and regulations for the protection of wild stocks (AS 16.05.730). Understanding how best to responsibly harvest Crawfish Inlet fall chum is being carefully evaluated and does not need to be added to the already full agenda of the Board of Fish meeting cycle. Hatchery issues are more adequately addressed through the proper procedures as outlined in the Joint Protocol on Salmon Enhancement #2002-215-FB rather than through the inappropriately proposed ACR #2.

Respectfully,

Eric Prestegard - Executive Director

Katie Harms - Tourism and Education Manager

Adam Zaleski - Research Manager



October 7, 2019

Alaska Board of Fisheries
P.O. Box 115526
1255 W 8th Street
Juneau, AK 99811-5526

To Whom It May Concern:

I am a resident of Juneau, Alaska. We own Taku Smokeries and Taku Fisheries in Juneau. We primarily process salmon, halibut, blackcod, tanner crab, and dungeness crab. The main species processed by volume is chum salmon that is produced by DIPAC hatchery in Juneau.

All hatcheries are permitted by the state of Alaska and undergo a very thorough public permitting process. The hatchery release site at Crawfish Inlet is no different and went through a long public process to get permitted. Regulations and policies already exist for the Alaska Department of Fish and Game to manage the Crawfish release site. ACR 2 fails to meet all three criteria established for an ACR.

Thank you for lending this comment your full consideration.

Sincerely,

Hank Baumgart
hank@icystraitseafoods.com

October 7, 2019

Alaska Board of Fisheries
P.O. Box 115526
1255 W 8th Street
Juneau, AK 99811-5526

To Whom It May Concern:

We make our living seining in southeast Alaska on the F/V Challenger. The hatchery program keeps us going when natural runs go through low cycles. Alaska's fisheries are successful because of science based management! Please don't mess this up by letting politics interfere.

ACR 2 does not meet criteria requirements. Thank you for lending this comment your full consideration.

Sincerely,

Jeffrey Golden
justgoldj1@aol.com



Kachemak Bay Conservation Society

3734 Ben Walters Ln, Homer, AK 99603

907 235.8214

kbayconservation@gmail.com



PC013
1 of 3

To:

The Alaska Board of Fisheries Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

dfg.bof.comments@alaska.gov

RE: ACR-2, Alaska Board of Fisheries Meeting October 23-24, 2019

Dear Members of the Board:

The stray rates of hatchery fish permitted by the Department of Fish and Game across the state—including into West Crawlfish Inlet—are likely to threaten the genetic integrity and viability of our wild stocks. Let us be clear, these policies are not supported by our statutes and in all likelihood have done irreparable harm to wild salmon. If this continues unchecked, Alaska may not have any more wild fish. How has the department been allowing such significant stray rates for so long?¹ What will the board do to protect wild salmon on behalf of all Alaskans? Please act to preserve West Crawlfish Inlet wild salmon.

¹ A number of ADF&G biologists share this question. Special Publication No. 09-10 “Alaska Department of Fish and Game Internal Review of Prince William Sound Aquaculture Corporation” by ADF&G in August 2009, for example, states : “The department has also documented large scale pink salmon straying, Joyce and Evans (unpublished data), Joyce and Evans (1999), and Joyce et al. (unpublished data). The studies found that

The proportion of hatchery salmon in stream escapements was greatest in the streams located adjacent to hatcheries in all years often reaching 100% by the final sampling event. Proportions of hatchery pink salmon were also high in southwestern streams distant from production hatcheries; proportions in the final sampling event ranged from 31% in Snug Harbor to 91% in Loomis Creek in 1997, and from 14% in Snug Harbor to 83% in Loomis Creek in 1998. No further studies were conducted to evaluate straying rates in other areas or even years.

The department has largely ignored the results of this study. It is unclear why the authors, one of whom was the PWS Area Management Biologist, did not follow up on the results of this study. The authors write

We have reported very high percentages of hatchery salmon in streams, especially in the southwestern region of Prince William Sound, and have commented briefly on the effects they may have on wild populations. We might ask how the hatchery permitting agencies of the State of Alaska allowed the current situation to arise.

This internal review questions how the authors allowed the problem continue without comment for the next decade.”



Despite Alaska's clear statutory requirement to shield wild genetics from hatchery genetics;² despite broad, clear, consistent data showing that hatchery-wild and hatchery-hatchery crosses are significantly less fit than wild-wild crosses,^{3 4 5} the department is officially unconcerned.

The department's official assessment that ACR-2's request to curb stray rates that are up to 99 percent into an area with "significant wild stock production of pink, chum, and coho salmon" does not constitute a "fishery conservation purpose or reason" is alarming and capricious.⁶ In response, we believe the board must ask the department:

- 1) What stray rates are acceptable?
- 2) What level of genetic degradation is acceptable?
 - What are the scientific justifications for each these positions?
 - In what specific ways does each position reflect the precautionary principle?
 - What are the annual statistically significant sample sizes needed to prove that we are within the acceptable stray rates and levels of genetic degradation per year?
 - What are the total data on straying and genetic impacts have been collected by the department on this system during all the years this hatchery has been operating?
 - What does the precautionary principle tell us we should do if we are lacking data?

² *Alaska Department of Fish and Game Genetic Policy* states that "gene flow from hatchery fish straying and intermingling with wild stocks may have significant detrimental effects on wild stocks. First priority will be given to protection of wild stocks from possible harmful interactions with introduced stocks..."

³ After looking at over 50 estimates of reproductive success from 6 case studies on 4 species of salmon, researchers found that even hatcheries using local or predominantly wild-origin parents produced fish with only half the reproductive success, on average, of their wild counterparts when both types of fish return to spawn in the wild environment. See "Surviving the wilderness: hatchery fish and fitness" online at https://www.nwfsc.noaa.gov/news/features/hatchery_fish/.

⁴ Preliminary results of recent genetic pedigree data from the ADF&G-sponsored study "Interactions of Wild and Hatchery Pink and Chum Salmon in Prince William Sound and Southeast Alaska" found *dramatic declines in fitness of progeny (F1)* of hatchery - wild crosses. These results were presented at the recent Alaska Marine Science Symposium meeting in Anchorage by ADF&G Fisheries Geneticist II, Kyle Shedd. They are consistent with what has been found with other salmon species in the Pacific Northwest:

⁵ Araki, Hitoshi et al. "Fitness of hatchery-reared salmonids in the wild." *Evolutionary applications* vol. 1,2 (2008): 342-55. Online at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3352433/>.

⁶ Alaska Department of Fish and Game Staff Comments on Agenda Change Requests Alaska Board of Fisheries Meeting Anchorage, Alaska October 23-24, 2019.



Kachemak Bay Conservation Society

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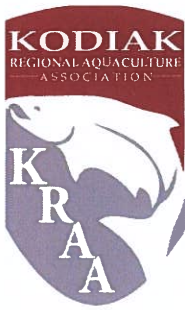
kbayconservation@gmail.com



PC013
3 of 3

Again, we ask the board to act on behalf of Alaskans and protect our common heritage of wild salmon. Please take steps to protect West Crawfish Inlet wild stocks.

Roberta Highland, President
Kachemak Bay Conservation Society



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October 8, 2019

Alaska Board of Fisheries
Reed Morisky, Chair
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P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Morisky and members of the Board of Fisheries,

KRAA opposes ACR 2 and would urge the Board to take no action on the proposal at your work session. This ACR fails to meet the Board's criteria, and is simply the latest in a series of proposals representing the opinion of a small but strident minority which has brought hatchery operators and countless stakeholders to nearly every meeting of the Board for over a year and a half. We contend that with the exception of the reinstatement of the Joint Board Protocol on Salmon Enhancement #2002-FB-215, these proposals have placed an unnecessary workload and drain on both the Board and stakeholders.

Conserve the Board's Time and Resources:

The Board should limit the ability of a single person to continually request the same types of Board action, out of cycle, and thereby cost the Board and stakeholders valuable time and resources. The author of this ACR has not been satisfied with the Board's decisions in the past and somehow believes that restating the same arguments, often half-truths and misleading restatement of policy, over and over again will eventually result in a different outcome. The Board should not reward this type of behavior. In this case, as in others, the information provided often reflects the opinions of the author. Hatchery operators, by contrast, have made every effort to provide the Board with a factual narrative based on sound science as counterpoint to the author's claims.

KRAA believes that the author's interest in ACR 2 is not really about West Crawfish Inlet but rather it is an interest in eliminating Alaska's entire hatchery program. Through the vehicle of the West Crawfish Inlet discussion, the author appears to be advocating that the Board implement sweeping statutory, regulatory, and policy changes for all enhancement programs in the State of Alaska. We contend that the authority to make these types of programmatic adjustments or changes to the current hatchery programs lies properly with ADF&G under the authority of the Commissioner.

Board's Prior Decision Making:

KRAA would encourage the Board to reference your recent actions and presentations at the Joint Protocol on Salmon Enhancement Hatchery Committee Meeting and your March Statewide Board meeting. Several proposals related to hatcheries were before the Board between February of last year and the



present. After extensive technical presentations, public testimony and robust Board discussion, the Board affirmed the Joint Protocol on Salmon Enhancement #2002-FB-215 and has scheduled another Hatchery Committee Meeting for March of 2020. The Board further committed to gaining better understanding of the enhancement programs and the programmatic standards before making regulatory changes.

ACR 2 Fails Acceptance Criteria

1. First and foremost, ACR 2 fails to meet the Board's criteria for acceptance as a Conservation Concern

Despite the rhetoric in ACR 2 there is not a conservation concern. The author cites genetics, disease, and ecosystem impacts as the basis for a conservation emergency. The genetics argument falls short when we consider that the project was designed to utilize a broodstock with different run timing than the West Crawfish stock. In so doing, the genetic integrity of the native stock is preserved, overlap between the enhanced stock and the wild stock is limited, and concerns related to potential introgression have been mitigated—maintaining wildstock priority in concept and in execution.

Straying in-and-of its self is not a conservation concern. The hatchery program, at its inception, acknowledged that all species of salmon stray to some degree. Some studies on natural stray rates for pink and chum salmon have generated estimates of 4-7% (Mortensen, et al, 2004) while others have provided estimates of 10% or greater (Small, et al, 2009; Wetheimer, et al, 2000 as well as other, earlier, studies). The author makes much of high stray *proportions* in West Crawfish in September and October but fails to reveal both the number of fish those stray proportions represent and that the naturally spawning stock is primarily present during July and early August, not September and October. Furthermore, in one of the few instances in which the author offers a citation (Withler, 1997), there is no mention that this particular paper was strictly about Coho salmon in the Pacific Northwest. Coho and chum salmon have very different life histories and differing inherent stray rates. In this instance, we are talking about vastly different population sizes as well. Additionally, it's important to recall that stray proportion and stray rate are two very different things. A relatively small sample size during a limited time period could easily result in a high stray proportion for that time period and still represent a very low percentage of the total spawners in a system and an even smaller fraction of the total adult return related to the enhancement project (stray rate).

Disease could be a conservation concern but it is not factually supported by the long term data set or any existing evidence of disease introduced in this population. Here, too, the author leaps from one species to another attempting to conflate Bacterial Kidney Disease (BKD) in Coho salmon (which is relatively common to that species) with transfer by hatchery-produced chum salmon (in which BKD is not common) to a naturally spawning chum population. In fact, verified information from the Department, presented to the Board in March, 2019, is clear: background levels of disease in naturally spawning salmonid populations in Alaska have not had observable increase since the inception of the enhancement programs.

Finally, the author's claim that ecosystem impacts create a conservation concern based on feeding rates is confounding. Returning adult salmon cease to feed as they prepare to spawn and then die and thus are unlikely to have any impacts on locally rearing fish at the time of return. If the author of this ACR was



attempting to make an argument related to the release and feeding of juvenile salmon in Crawfish Inlet, the argument was neither clearly made nor supported. The long term evidence of continued high productivity, and even record returns, of wildstocks in the decades-long presence of robust enhancement programs speaks for itself.

2. Error in Regulation

ACR 2 fails to establish that there is an error in regulation. The author's extensive Regional Planning Team discussion relative to regulation error doesn't make sense. Regional Planning Teams do not have regulatory authority.ⁱ

3. Unforeseen Effect on a Fishery

With the RPT process and subsequent monitoring, it is unlikely that there would be an "unforeseen effect" on the fishery that could justify acceptance of an ACR. Moreover, ACR 2 doesn't come close to meeting the bar. Further, it's important to note that in response to observed straying in West Crawfish Inlet, NSRAA and ADF&G have coordinated to utilize existing regulatory framework and Management authority to more effectively harvest late-returning chum salmon associated with the Crawfish Inlet chum release. This is yet another example of how the permitting and regulatory processes exist to preserve wildstock priority. The author asserts that a loss of productivity could, perhaps, have a potential future impact on a fishery. The author then fails to demonstrate that hatchery programs in general, or this project in particular, have resulted in reduced wild stock productivity in hatchery-associated areas or in the system in West Crawfish. Again, the Board must consider the facts as they are, not as a specific advocate would like them to be.

In summary, because ACR 2 does not meet the Boards established allocation criteria and is outside of the Board's direction and intent regarding hatcheries as indicated during the Board's March 2019 meeting, the Alaska Board of Fisheries should take no action on ACR 2 at your October, 2019 work session.

Very Truly Yours,

Tina Fairbanks,
KRAA Executive Director

ⁱ It may be necessary to set the record straight on a number of points regarding Regional Planning Teams (RPT's).

- The Regional Planning Teams (RPTs) are not "dominated" by the aquaculture associations but have equal and often strong Department of Fish and Game representation. These bodies do NOT "authorize permits and make the decisions" regarding enhancement projects within the regions. In fact, the RPTs only make recommendations related to those projects. Decisions and permit approval are the sole authority of the Commissioner of ADF&G.



-
- To assert that projects are permitted without rigorous review is also false. The permitting process for a new project is extensive. A project will spend a year or more and often several years under discussion. Frequently, the initial plan/permit request is rejected while the Department and aquaculture association formulate and refine different iterations until agreement is reached.
 - Once the permit request is submitted the process continues through various divisions within ADF&G including Pathology, Genetics, Management, Research, and Sportfish. The Department reviews the proposed project for compliance with the Genetics and Sustainable Salmon Fisheries Policy, at a minimum. A project that does not meet the bar of those policies is NOT permitted.
 - Many potential projects never make it to the permitting stage because in-region talks between the Department and the aquaculture associations reveal insurmountable challenges to the project. Always, the precautionary approach utilizing statute, regulation, and policy is exercised to assure a wild stock priority.
 - At the RPT level, a tie vote fails, and the Commissioner will be notified that the RPT cannot support a recommendation to approve the requested permit.
 - To contend that this process, and the public meetings that surround each and every proposed project by an aquaculture association, lacks proper consideration of wild stocks or conservation issues is simply false.



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Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Submitted VIA: Alaska Board of Fisheries Comment Website

RE: Opposition ACR 2

October 8, 2019

Dear Chairman Morisky and Board of Fisheries Members,

I am a commercial salmon fishermen from Homer. I raised our family on the back deck of our seiner and want to see opportunities for my children and grandchildren, therefore, I care about sustainable management of our fisheries.

I think ACR #2 fails to meet any of the three criteria required for an agenda change request and should not be allowed to move forward as an out of cycle proposal. The State of Alaska has a rigorous and open public process to determine whether a PNP hatchery permit is warranted under the authority of the ADF&G commissioner. In addition, protection of wildstocks is paramount to the integrity of the enhancement program. Safeguards are built into the regulations such as requiring use of nearby salmon broodstock and sliding scales for wild salmon eggs to ensure biological escapements are met during the development of the hatchery's first generation. The regulatory framework is structured to minimize impacts to wild stocks with strict protocols to protect fish health (fish pathology and transport policies), genetic integrity by using local stocks, locating enhancement programs spatially and temporally distant from significant wildstocks, and aggressive harvest management on enhanced salmon returns once they are segregated from wildstocks.

ACR#2 does not establish a fishery conservation concern. The local streams in the Crawfish Inlet area are meeting their pink, chum, and coho escapement goals due to ADF&G fishery management. The West Crawfish wild stock has a summer run timing while the Medvejie stock is a fall run with a spawn timing in late August to late September. ADF&G recommended this site because of temporal separation according to their escapement survey data.

There is mention of impact of adult enhanced salmon eating prey the wildstocks would otherwise eat. It is well known salmon cease to eat when they near the terminal area to spawn. Salmon put their energy reserves into gonad development, final migration to spawn location, and mate selection, not chasing prey.

ACR #2 fails to correct an error in regulation. What the proponent has stated in this section cites no error. They may not like RPTs function, but they were established in regulation as a body that makes informed recommendations to the commissioner of ADF&G. The proponent has stated incorrect or outright false statements about RPTs being secret, or closed door or not allowing



public comment. RPT public records demonstrate quite the opposite. The proponent appears to want to change regulations outside the scope of BOF authority. There is no error.

ACR #2 fails to correct an effect in a fishery that was unforeseen. All concerns articulated by the author have been considered by ADF&G since the inception of the hatchery program. These concerns are the basis for hatchery permitting to ensure the sustainability of our natural fish stocks. Disease, genetics, and ecosystem impacts are given strong consideration in the decision process for site and stock selection. Both in the beginning and now, the presence of hatchery fish in area streams, and potential for genetic introgression between hatchery fish and wild is neither unexpected, nor unforeseen. For this reason, this ACR fails the third criteria required for its consideration by the board.

In closing, I feel that ACR #2 has failed to meet any of the three agenda change request criteria and should not be considered out of cycle.

Sincerely,

Matt Alward, owner of Alward Fisheries, LLC

RE: ACR 2 Modify hatchery operations in Crawfish Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish (5 AAC XX.XXX)

I support the agenda change request {ACR} and action proposals proposals made in ACR 2 and in EF-F19-095 and 097 by Nancy Hillstrand and Pioneer Fisheries. The ACR and action proposals all relate to adverse impacts caused by hatchery salmon on Alaska's wild fish stocks. When it passed the nonprofit hatchery act years ago, the Legislature express its intent that the goal of hatchery operations should be to "rehabilitate" Alaska's then-depressed wild salmon fisheries. That goal is no longer at the center of hatchery operations, however. Instead, nonprofit hatcheries largely produce millions of fish for commercial harvest irrespective of the need for the rehabilitation of a particular fishery or fisheries. As a result, straying hatchery fish now threaten wild stocks through insufficiently regulated remote release programs, such as the one discussed in ACR 2. Straying hatchery fish also undercut the reliability of ADF&G's determinations that streams are achieving its sustainable escapement goals for wild fish. And straying fish are traveling vast distances out of district, into areas where wild fish stocks are already under duress; a well known example of this phenomena is the straying of Prince William Sound hatchery salmon into Cook Inlet fisheries. ACR 2 and EF-F19-095 and 097 offer a suite of recommendations for the BOF to choose from in order to address these and other problems associated with hatchery operations. If implemented, these recommendations will help protect wild salmon stocks. They will also lead to the collection of more reliable data concerning hatchery impacts so that sound fisheries-management policy decisions can be made going forward. Thank you for considering these comments. Mike Frank 2224 Turnagain Parkway Anchorage, AK 99517 (907) 248 5078



Pioneer Alaskan Fisheries Inc.
Nancy Hillstrand
Box 674
Homer, Alaska 99603

RE: STRAYING of Hatchery Salmon ACR 2;

The issue of hatchery straying in West Crowsfoot NE Arm is a grave conservation issue for the fish and for the fisheries. The Department in the past has been open and honest about this issue but now there appears to be impediments placed on staff to come forward to speak openly.

Straying leads to unreliable Escapement Goals. This poses a significant risk to wild fish.

This in itself is a grave conservation issue that the department acknowledges but cannot speak about? This issue needs to be openly debated before we do more harm to wild populations

The **Special Publication No. 09-10 ADFG Internal Review PWS Hatcheries** is an excellent document that comprehensively explains many issues honestly that presently are behind closed doors putting wild fish at risk.

STRAYING AND WILD STOCK ISSUES (excerpt from 2009 Internal Review)

"Large-scale straying of the PWSAC enhanced chum salmon also has negative implications on wild stock management. The department manages for wild chum salmon escapement goals based on aerial survey counts of fish in streams. **All fish counted in streams are assumed to be wild stock fish. The presence of a high proportion of stray hatchery fish in streams artificially inflates wild stock escapement estimates.** Inflated wild stock escapement numbers may mislead management into believing that the escapement goals have been met. The department then opens districts to harvest wild stock fish assumed to be excess to escapement goals. However, the escapement goal may not have been met because of the large number of hatchery strays in the aerial survey escapement estimates. Additionally there are significant genetic concerns associated with hatchery strays interbreeding with wild stocks."¹

Large-scale hatchery chum salmon straying also has negative implications for the SEAK Allocation Plan. Potentially thousands of hatchery chum salmon may be harvested by unintended gear groups or in unintended locations that, depending on the number of strays, may influence gear specific exvessel values.

The American Fisheries societies Ocean Ecology of Chum Salmon by Urawa et al 2018 states:

¹ **Special Publication No. 09-10 ADFG Internal Review PWS Hatcheries**



- "The straying of hatchery-produced salmon to interbreed with wild fish is of concern.
- The straying of hatchery salmon into wild population streams may affect wild salmon populations through ecological and genetic mechanisms"
- The rapid development of salmon enhancement increases the risk of disease outbreaks in hatcheries and probably also in natural waters.
- Diseases caused by protozoan parasites are a considerable problem at intensive salmon hatcheries and some parasites have the potential to cause marine mortality of chum salmon or threaten human health
- Because Chum salmon is sensitive to BKD, experimental and field studies will be required to assess the impact of BKD on the behaviour and survival of Chum salmon in the ocean.

Is there a fishery conservation purpose or reason? **Most definitely.**

Remote releases of hatchery salmon have impacts on wild salmon. Genetics, ecosystem impacts introducing a predator, disease, drawing in of predators, unreliable escapement goals, crowding causing low dissolved oxygen, predation on decapods.

It is naive to compare straying of artificially propagated hatchery salmon as if equal to wild salmon that possess full genetic diversity, experience and fitness, from millennia of immense natural selection.

Keefer and Caudil State:

"In undisturbed populations, adult straying is a fundamental component of metapopulation biology, facilitating genetic resilience, demographic stability, recolonization, and range expansion into unexploited habitats. Unfortunately, salmonid hatcheries and other human actions worldwide have affected straying in ways that can negatively affect wild populations through competitive interactions, reduced productivity and resiliency, hybridization and domestication effects, and outbreeding depression."

Disruption of run timing is also cause for concern. This hatchery straying introduces fall run hatchery chums into the early run West Creek run timing.

THE HATCHERY ACT MANDATES REASONABLE SEGREGATION

The legislature demanded "Reasonable segregation" as a "shall do" mandate in the PNP hatchery Act. Hatchery fish are clearly differentiated, distinctly stating this two times in the second sentence the statute that allowed PNP hatcheries.



Section 1. INTENT. It is the intent of this Act to authorize the private ownership of salmon hatcheries by qualified nonprofit corporations for the purpose of contributing by artificial means, to the rehabilitation of the state's depleted and depressed salmon fishery.

The program shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks.

Hatchery strays at this magnitude is not "reasonable segregation" from naturally occurring stocks.

Since the Comprehensive Salmon Plans and the Genetics Policy use 2% as reasonable, how far does the bar continue to get raised? If not the 2% then 20%? 40%? Is 60%-70 as in West Crawlfish now considered reasonable segregation?

What is the ADFG standard on acceptable straying?

What is involved in the matrix of what is considered acceptable?

What criteria are used to allow straying?

Why is there no consistency in ADFG policy on straying?

Where is the "reasonable segregation" policy in regulation to reflect and uphold legislative mandate?

Straying of hatchery fish is a chronic dilemma faced by ADFG to uphold mandates for wild fish priority and to provide reliable Escapement Goals, the crown of ADFG salmon management.

Straying of hatchery fish in high proportions and over long distances have been documented jeopardizing wild fish priority, and sustainable salmon populations. It runs contrary to state law.

Wild Alaskan Salmon Marine Stewardship Council Certification is being jeopardized by this intense straying. This issue is harming not only the fish but the fisheries through questionable practices harming markets. Alaskans deserve a segregation policy. Straying must be faced as Alaska is under the microscope. This issue is not going away. We can no longer hide. At least we can show that we are sincerely attempting to protect wild salmon populations, and protect the wild stock fisheries and fisherman from adverse effects of hatchery interactions.

- **MSC Intertek Fisheries Certification 2015 Ltd Certificate No.: MML-F-156 Southeast Alaska (SEAK) Condition 1 Investigations of chum salmon hatchery straying in the NSI subarea indicate extensive straying into wild streams** including from remote release sites, with averages exceeding 9% of the total escapement and with a range to > 60% in individual streams. The presence of such large straying rates suggests that enhancement activities for this species may have negative impacts on the local adaptation of wild stocks through introgression with the hatchery fish, which has a risk of decreasing the



reproductive performance and diversity of wild stocks. In order to meet the SG80 level of performance, a condition of certification is introduced.

- **By the end of 2023, the SG 80 scoring requirements must be met in full. This will be achieved when it has been demonstrated that: a) (PI 1.3.1, SG80a): It is highly likely that the chum salmon enhancement activities in SEAK do not have significant negative impacts on the local adaptation, reproductive performance and productivity or diversity of wild chum salmon stocks.**
- Strays have been documented 950 miles from PWS hatcheries found in SEAK²;
- Strays have been documented 250 miles from PWS hatcheries found in LCI³
"Salmon hatcheries have long been used across the Pacific Northwest as a tool to enhance fisheries, but these benefits may come with some cost to wild stocks. Wild stocks may be adversely affected by hatchery-origin fish in spawning streams as, among other things, they can inflate escapement indices making it difficult for managers to assess escapement goals."
- **All SEAK streams contaminated⁴:** We found hatchery fish in nearly every stream that was sampled, which indicates that most chum salmon streams in Southeast Alaska, even those far removed from hatchery release sites, have at least some hatchery fish present.
- **2009 ADFG Internal Review⁵** is a most definite bone of contention **for reliable Escapement Goals** yet the blind eye continues without policy to direct and define what is "reasonable segregation" .

ADFG AGREES, ESCAPEMENT GOALS ARE SKEWED AND UNRELIABLE WITH HATCHERY STRAYS

STRAYING AND WILD STOCK ISSUES (excerpt from 2009 Internal Review)

"Large-scale straying of the PWSAC enhanced chum salmon also has negative implications on wild stock management. The department manages for wild chum salmon escapement goals based on aerial survey counts of fish in streams. **All fish counted in streams are assumed to be wild stock fish. The presence of a high proportion of stray hatchery fish in streams artificially inflates wild stock escapement estimates.** Inflated wild stock escapement numbers may mislead management into believing that the escapement goals have been met. The department then opens districts to harvest wild stock fish assumed to be excess to escapement goals. However, the escapement goal may not have been met because of the large number of hatchery strays in the aerial survey escapement estimates. Additionally there are significant genetic concerns associated with hatchery strays interbreeding with wild stocks."

² Angler et al 2001

³ Special Publication 18-11 ADFG observations of pink salmon hatchery proportions

⁴ Fishery Manuscript Series No. 12-01 - Hatchery Chum Salmon Straying Studies in Southeast Alaska, 2008–2010

⁵ Special Publication No. 09-10 ADFG Internal Review PWS Hatcheries



ONE OF THE DEPARTMENTS GREATEST CONCERNS...GENETIC INTEGRITY

"One of the department's greatest concerns are the implications to the genetic integrity of wild populations and to fishery management. Local adaptations among wild pink salmon populations have been demonstrated. Hatchery salmon are believed to become genetically distinct from the originating native population(s), and concern arises from the belief that the fitness of locally-adapted wild populations is reduced upon genetic integration with domesticated hatchery salmon.

Utilizing the relation between hatchery chum salmon straying rates and total instream chum salmon abundance, we interpolated ~40,000–45,000 hatchery chum salmon strayed into wild stock streams throughout PWS in 2005. The calculation was made using streams with observed chum salmon from the 208 index streams in 2005 (n=80). This is ~25% of the (175,000 mid point) 2005 Sustainable Escapement Goal used for managing wild stock chum salmon in PWS, ~21% of PWSAC's annual chum salmon brood collection, and ~5% of the total PWSAC hatchery chum salmon contribution to the CPF harvest using a 5-year average (Appendices A8 and A9).⁶

ALASKA HATCHERY RESEARCH PROGRAM

The most recent initial results coming from the Alaska Hatchery Research Program (AHRP) has documented lowered productivity of hatchery salmon by 50% as compared to wild. This ADFG promoted study initiated due to the MSC conditions of concern, in itself should give serious pause if 5 AAC 39.222 Sustainable Salmon Policy, its attendant Precautionary Principle and AS 16.05.730. Management of Wild and Enhanced Stocks of Fish is to be taken seriously.

Alaskans deserve consistency and policy on hatchery straying contaminating wild river systems. We need a policy of what will fairly and equitably be condoned to avoid damage to our wild stocks and stabilize this chronic confusion of what is right and wrong.

Pacific salmon (*Oncorhynchus* spp.) are organized into distinct populations because of homing behavior (Rich and Holmes 1939, Ricker 1972). The alternative to homing is straying, in which fish do not return to their natal streams to spawn but spawn elsewhere (Bams 1976). Even though some straying occurs among wild populations (usually less than 5%; Beamish, R.J., editor 2018. The ocean ecology of pacific salmon and trout. American Fisheries Society, Bethesda, Marilyn Lindsey et al. 1959, Vernon 1957, Rich and Holmes 1928), the amount of straying between natural and hatchery stocks is of concern because it can reduce the fitness of natural populations (Fleming and Gross 1993, Meffe 1992, Leider et al. 1990, Waples 1991). Evidence shows that some transplanted stocks are less productive than locally adapted populations, and that hatchery populations are generally less productive in nature than native locally adapted populations (Leider et al. 1990, Reisenbichler 1996, Chilcote et al. 1986). Introductions of hatchery fish into a river system can also displace wild fish or reduce their

⁶ Special Publication No. 09-10 ADFG Internal Review



abundance (Nickelson et al. 1986). The effects of hatchery fish on wild populations are well documented (see Can. J. Fish. Aquat. Sci. 1981, 38(12), Aquaculture 1991, 98(1-3)).⁷

Altukhov and Salmenkova (1991, p. 28, 35-36): " stated:

. . . many anadromous fish are now reproduced artificially in hatcheries and reared and released into the rivers--but the method is insufficiently effective. This is because the species' population genetic structure has not been taken into account These data testify to the negative genetic effects of existing salmonid exploitation and management practices. Artificial reproduction, commercial fisheries, and transfers result in the impairment of gene diversity in salmon populations, and so cause their biological degradation."

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⁷ NOAA Tech Memo NMFS NWFS-30: Genetic Effects of Straying of Non-Native Hatchery Fish into Natural Populations



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MSC Intertek Fisheries Certification Ltd Certificate No.: MML-F-156 Southeast Alaska (SEAK)
Condition 1 Investigations of chum salmon hatchery straying in the NSI subarea indicate extensive straying into wild streams including from remote release sites, with averages exceeding 9% of the total escapement and with a range to > 60% in individual streams. The presence of such large straying rates suggests that enhancement activities for this species may have negative impacts on the local adaptation of wild stocks through introgression with the hatchery fish, which has a risk of decreasing the reproductive performance and diversity of wild stocks. In order to meet the SG80 level of performance, a condition of certification is introduced.

Nickelson, T. E., M. F. Solazzi, and S. L. Johnson. 1986. Use of hatchery coho salmon presmolts to rebuild wild populations in Oregon coastal streams. Can. J. Fish. Aquat. Sci. 43:2443-2449.

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- **West Crawfish index stream is being inundated with proportions above 60% with what is scientifically referred to as maladapted hatchery salmon.**
- **West Crawfish accounted for an average 24% of the total Northern Southeast Outside subregion index. ADFG Comments on ACR2**
- **The ADFG attempted to slow the remote release at crawfish but were overpowered by the Regional Planning Teams (Please read the 2014 RPT minutes carefully)**
- **Not all information was forwarded to the commissioner from the RPT deliberations.**
- **Crawfish Inlet was chosen as a remote release site to minimize wild stock interaction. (2014 RPT minutes)**
- **If problems resulted, the remote release was to be pulled back.**
- **Otolith samples have been collected at this stream for 7 years; the proportion of hatchery strays in samples increased substantially in 2018 and 2019 compared to previous years, and the largest portion of hatchery strays originated from the Crawfish Inlet hatchery release site.**

Please utilize the Precautionary Principle and address the hatchery straying issue in Alaska and create a Straying Policy in regulation that protects wild salmon and upholds law for all salmon stakeholders.

Sincerely,

Nancy



HOW CAN WILD FISH PRIORITY BE UPHELD WITH DOMINATION OF PARTICIPANTS WITH VESTED INTEREST (IN BOLD) AT THE SE REGIONAL PLANNING TEAM MEETING?

Joint Northern/Southern Southeast Regional Planning Team Meeting

Tuesday, April 8, 2014 Glacier Room Aspen Suites Hotel 8400 Airport Boulevard Juneau, Alaska 99801

Chair:

Flip Pryor, ADF&G CF Division, Resource Development, Douglas

ADF&G RPT Representatives:

1. **Brian Frenette, Division of Sport Fish (SF), Douglas**
2. **Lowell Fair, Division of Commercial Fisheries (CF), Fisheries Management, Douglas**

Ron Josephson, CF, PNP Hatcheries, Juneau

Southern Southeast Regional Aquaculture Association (SSRAA) RPT Representatives:

Chris Guggenbickler, Gillnet, Wrangell

John Peckham, Seine, Ketchikan

Dave Otte, Troll, Ketchikan

Northern Southeast Regional Aquaculture Association (NSRAA) RPT Representatives:

Kevin McDougall, Gillnet, Juneau

Sven Stroosma, Seine, Bellingham/Mt Vernon

George Eliason, Troll, Sitka

Non-Regional Hatcheries with a Northern Southeast Region RPT Representative:

Eric Prestegard, Douglas Island Pink and Chum, Inc. (DIPAC) (ex officio)

Commerce, Community, and Economic Development Representatives:

Andy Macaulay, Division of Investments, Juneau (ex officio)

U.S. Department of Agriculture, Forest Service RPT Representatives:

3. **Sheila Jacobson, USFS (ex officio)-(teleconference).**

SSRAA Staff: Ketchikan

John Burke, General Manager

Sue Doherty, Research Manager

Bill Gass, Production Manager

Bret Hiatt, Operations Manager

NSRAA Staff: Sitka

Steve Reifentstahl, General Manager

Scott Wagner, Operations Manager

ADF&G Staff:

Judy Lum, SF, Douglas

Dan Grey, CF, Sitka-(teleconference)

Lorraine Vercessi, CF, Juneau

Pattie Skannes, CF, Sitka

Mark Stopha, CF, Juneau

Sam Rabung, CF, Juneau

Peter Bangs, CF, Juneau



4. Michelle Morris, CF, Juneau ?

Other Participants:

Kathy Hansen, SEAFA, Juneau

Bart Watson, Armstrong-Keta Inc., Juneau

Jake Musslewhite, Armstrong-Keta Inc., Juneau

Lars R. Stangeland, DIPAC Board, Juneau

Jeff Lundberg, Klawock River Hatchery, Klawock

5. Tom Gemmell, USAG, Juneau ?

Charles McCullough, NSRAA, Petersburg

Jim Andersen, Division of Economic Development, Juneau

Dave Ohmer, Trident Seafoods, Petersburg

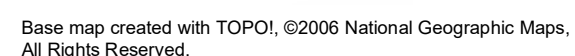
6. John Joyce, NOAA, Auke Bay Lab, Juneau ?

7. Max Worhatch, USAG, Petersburg ?

8. Martin Lunde, SEAS, Juneau ?

Justin Peeler, NSRAA, Seine, Sitka

Mitch Eide, NSRAA, Seine, Petersburg- (teleconference)



Access this map on the web at
<http://www.adfg.alaska.gov/sf/SARR/AWC/index.cfm?ADFG=maps.maps>



Location Map



ALASKA

-  Anadromous Streams
 Anadromous Areas
 AWC Stat Area
 Regional Boundary

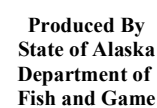
SPECIES CODES

CO	coho salmon
CH	chum salmon
K	chinook salmon
P	pink salmon
S	sockeye salmon

LIFESTAGE CODES
p Present
m Migration
r Rearing
s Spawning

AC Arctic char
AL Arctic lamprey
AW Arctic cisco
BC broad whitefish
BW Bering cisco
CT cutthroat trout
DV Dolly Varden
GS green sturgeon
HW humpback whitefish
LC least cisco
LP lamprey, undifferentiated

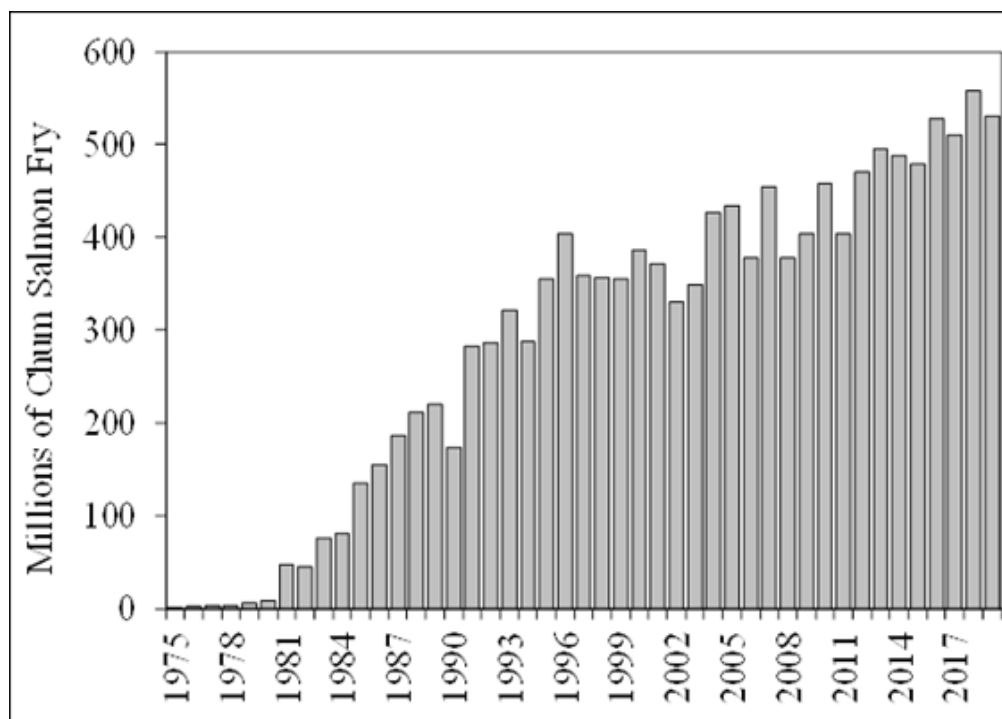
LV	river lamprey
OL	longfin smelt
OM	rainbow smelt
OP	pond smelt
OU	eulachon
PC	Pacific lamprey
SF	inconnu (sheefish)
SH	steelhead trout
SM	smelt, undifferentiated
ST	sturgeon, undifferentiated
W	whitefish, undifferentiated
WS	white sturgeon



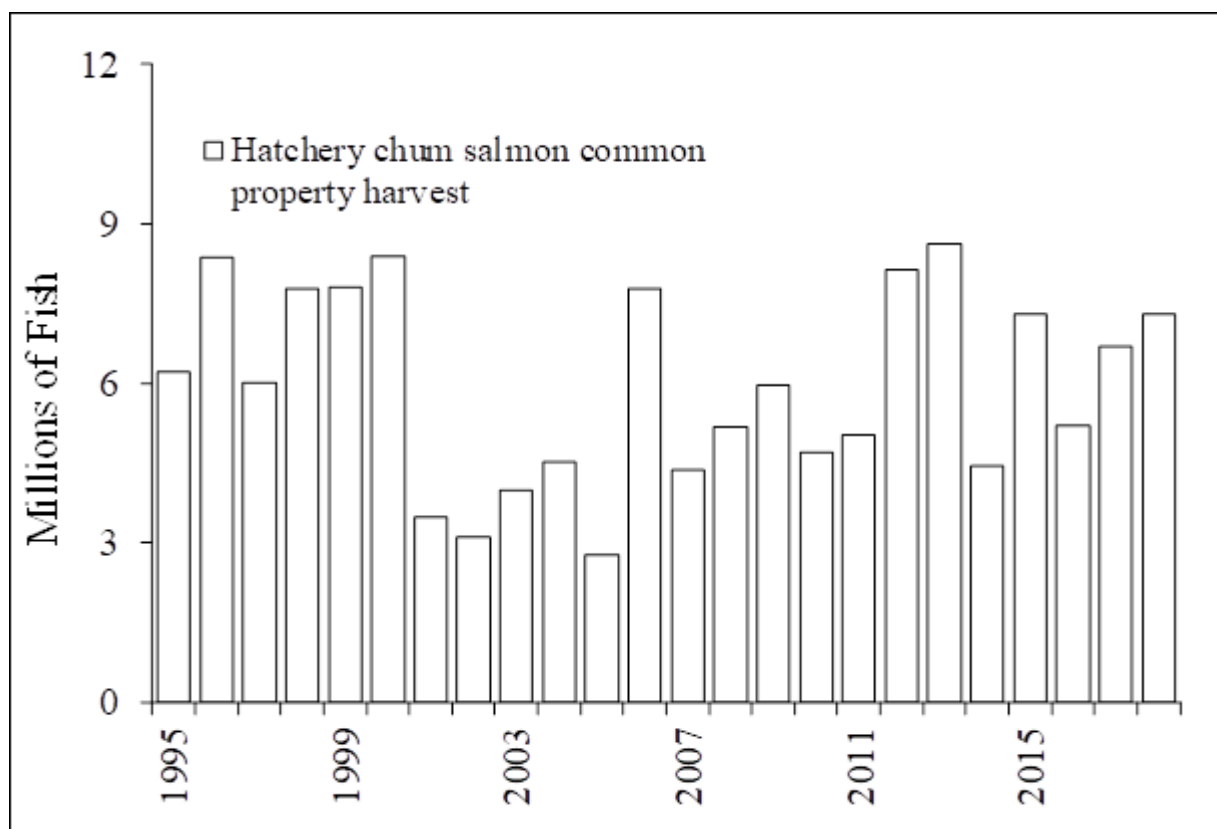
Quad No. 007 (PTA)

Port Alexander D-4

Revision Date 10/26/2018



SEAK HATCHERY RELEASE INCREASES 1976-2019



COMMON PROPERTY HATCHERY CHUM HARVEST

HATCHERY INCREASES IN SE ALASKA ARE LEADING TO MASSIVE WILD INDEX STREAM CONTAMINATION. THIS INCREASE DOES NOT EQUATE TO FISHING HARVEST

6.6 Sawmill Creek Hatchery PAR to add 50 million chum salmon eggs and add Crawfish Inlet as a remote release site.



PC017
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Introduction: (Steve Reifensstuhl, General Manager, NSRAA) NSRAA has been searching for a new chum salmon program since 1999. Recently, NSRAA has submitted two management feasibility requests with the department; one in Excursion Inlet and the other for Pelican. **The department did not review either of those sites favorably.** NSRAA requested the department look at the geography of northern Southeast Alaska and come up with a list of possible sites the department might consider for a new pink or chum salmon program. The department produced a report with several areas that could possibly work for a new release site, **but the document was not intended to be a guarantee that any PAR submitted for one of those locations will pass without question.** NSRAA chose Crawfish Inlet as a new release site based on the report and the ability to utilize Sawmill Creek Hatchery. There will need to be several modifications made to the facility and there will be difficult operational challenges, but there is water available to handle the requested production. The PAR is requesting 50 million chum salmon eggs. Medvejie Creek Hatchery fall chum salmon stock will be used, which will require approximately 50,000 additional adult chum salmon for broodstock. The eggs would be taken at Medvejie Creek Hatchery and transported to Sawmill Creek Hatchery for incubation. In the spring, the fry will be moved from the incubators into transfer tanks, held for 24 hours, and then transported by boat to Crawfish Inlet for short-term rearing and release. **Crawfish Inlet is approximately 40 miles by boat from Sawmill Creek Hatchery.** The return on a 50 million chum salmon egg program, given current marine survival (2%) and price (\$.55/lb.), would generate a four million dollar fishery. If all four million dollars went to the troll fleet, they would be in their lower end of their target allocation of enhanced salmon range. The findings of the Alaska Board of Fisheries (**Southeast Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364) Finding #94-02-FB**) lists three tools for making adjustments to the distribution of harvest to meet allocation percent goals: 1) special harvest area management adjustments; 2) new enhanced salmon production; and 3) modification of enhancement projects production, including remote releases. This PAR uses the second and third tool to address the current allocation imbalance. This PAR also could test the theory heard many times during allocation discussions; that trollers can harvest all the returning fish in a THA if they are given exclusive rights to the area. NSRAA will ask for the THA to be permitted for all three gear groups, and the NSRAA board will use the THA as a tool to address allocation imbalances. **Crawfish Inlet was chosen to minimize wild stock interaction.** There should be very few non-target species caught in the THA located in the bay. There may be some non-target species caught in the troll fishery that is open in front of Crawfish Inlet in August. As the fishery targeting the Crawfish Inlet return is ramping up, sampling should be able to identify if too many non-target species are being harvested. **If a problem is identified, the Crawfish Inlet fishery could be pulled back into the THA to minimize non-target species catch.** The 50 million chum salmon egg increase was not chosen arbitrarily; the return on a 50 million chum salmon egg release is what is necessary to give the fishermen a return on investment that is large enough to justify the amount of money NSRAA plans to invest in this new project.

Discussion: The stock composition of Medvejie Creek Hatchery fall chum salmon is 18% three-year-olds. If 50 million chum salmon eggs are taken in 2014, the first return would be approximately 170,000 adults in 2018 (all three-year-olds), and 810,000 adults in 2019 (three and four-year-olds), and a full component (three, four, and five-year-olds) in 2020. Medvejie Creek Hatchery takes 20 million eggs for release at the hatchery to provide broodstock for the chum salmon program. It may be difficult to produce the entire 50 million chum salmon eggs for the Crawfish Inlet release every year.

West Crawfish Inlet has a summer chum salmon return that is used by the department as a indicator stock. The West Crawfish Inlet chum salmon stock was sampled last year as part of the straying study and

The department may require NSRAA to continue to sample the West Crawfish Inlet system after the straying study work is completed. The department feels that 20 million chum salmon eggs is a conservative baseline level for evaluation of a new chum salmon program. An NSRAA gear representative noted there is a difference when comparing Crawfish Inlet and Port Asuncion; the Port Asuncion project is primarily trying to generate cost recovery for POWHA while the Crawfish Inlet project is being developed to create commercial fishing opportunity.

The department's biggest concern with this project is potential straying into the West Crawfish Inlet chum salmon indicator stream. The department would like to start with lower numbers and ramp the program up if no problems develop when the fish return. An NSRAA gear representative noted that if the return is not large enough to attract gear effort, especially with the troll fleet, then the evaluation of the fishery may not be accurate. **The ideological argument; in order to truly test a new program, the program has to be tested at full production to see if there are any problems, but testing at full production requires an understanding that the program would ramp down if problems are discovered.** An NSRAA representative noted that the 50 million chum salmon egg number was **derived from a business goal.** Furthermore, the department adopting an arbitrary 20 million egg starting point for chum salmon projects changes how an association can operate. At this point the discussion revolved around how the department chose the starting point of 20 million and whether there was a chance of increasing that number. NSRAA felt the number was arbitrary and a complete surprise, especially as it was presented as policy or a long standing guideline. The department projected a 500,000 adult chum salmon return from a 20 million egg program, which they feel is a significant enough return to evaluate the program while also making contributions to the commercial fleet. A department motion to amend the PAR from 50 million to 20 million chum salmon eggs for Crawfish Inlet failed to carry by a vote of 3-3. The votes were split between the department and industry representatives. The PAR was tabled until the department had a chance to talk with genetics staff.

Sitka Tribe of Alaska (STA) submitted a letter in opposition to the NSRAA PAR to take 50 million chum salmon eggs for release at Crawfish Inlet. STA believes this release site will have a negative impact on resident salmon stocks in Crawfish Inlet, on subsistence sockeye salmon returning to Necker Bay, on the Sitka Sound herring stock, and the wilderness character of the area surrounding Crawfish Inlet.

The funding for the current straying study should take the project through 2016. Additional funding is available with the goal of continuing the project through 2023. **The West Crawfish Inlet summer chum salmon are in the stream by the first week of August, which should provide segregation from the Medveje Creek Hatchery fall chum salmon.** The department was willing to agree to a 30 million egg amendment if: **1) NSRAA commits to sampling the West Crawfish Inlet index stream, if it is not already being sampled in the current straying study; 2) the terminal harvest will be sampled for wild stock interception; 3) NSRAA will be required to clean up the special harvest area if there is a buildup of returning hatchery chum salmon.** NSRAA staff suggested a management plan that provides a cleanup fishery by cost recovery seine or commercial net gear, as necessary, to minimize straying concerns and evaluate the efficiency of the troll fishery.

Action: McDougall **MOVED** and Eliason **SECONDED** to **AMEND** the Sawmill Creek Hatchery PAR from 50 million to 30 million chum salmon eggs and add a remote release site at Crawfish

Inlet. **VOTE:** the motion to amend **CARRIED** unanimously. The vote to recommend approval **CARRIED** unanimously.



Minutes
Joint Northern/Southern Southeast Regional Planning Team Meeting
Tuesday, April 8, 2014
Glacier Room
Aspen Suites Hotel
8400 Airport Boulevard
Juneau, Alaska 99801

Chair:

Flip Pryor, Alaska Department of Fish and Game (ADF&G) CF Division, Resource Development, Douglas

ADF&G RPT Representatives:

Brian Frenette, Division of Sport Fish (SF), Douglas

Lowell Fair, Division of Commercial Fisheries (CF), Fisheries Management, Douglas

Ron Josephson, CF, PNP Hatcheries, Juneau

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Sven Stroosma, Seine, Bellingham/Mt Vernon

George Eliason, Troll, Sitka

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John Burke, General Manager

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Bret Hiatt, Operations Manager

NSRAA Staff: Sitka

Steve Reifentstahl, General Manager

Scott Wagner, Operations Manager

ADF&G Staff:

Judy Lum, SF, Douglas

Dan Grey, CF, Sitka-(teleconference)

Lorraine Vercessi, CF, Juneau

Pattie Skannes, CF, Sitka

Mark Stopha, CF, Juneau

Sam Rabung, CF, Juneau

Peter Bangs, CF, Juneau



Michelle Morris, CF, Juneau

Other Participants:

Kathy Hansen, SEAFA, Juneau
Bart Watson, Armstrong-Keta Inc., Juneau
Jake Musslewhite, Armstrong-Keta Inc., Juneau
Lars R. Stangeland, DIPAC Board, Juneau
Jeff Lundberg, Klawock River Hatchery, Klawock
Tom Gemmell, USAG, Juneau
Charles McCullough, NSRAA, Petersburg
Jim Andersen, Division of Economic Development, Juneau
Dave Ohmer, Trident Seafoods, Petersburg
John Joyce, NOAA, Auke Bay Lab, Juneau
Max Worhatch, USAG, Petersburg
Martin Lunde, SEAS, Juneau
Justin Peeler, NSRAA, Seine, Sitka
Mitch Eide, NSRAA, Seine, Petersburg- (teleconference)

1.0 Call to order. Flip Pryor called the meeting to order at 8:10 a.m.

2.0 Introduction/Public Comment. Pryor noting the meeting was being recorded for the purpose of keeping the minutes. Comments from the public were accepted throughout the meeting.

3.0 Amend or approve agenda. Two items were added to the agenda; a discussion on the calculation of king and coho salmon values and a presentation on the history of private non-profit (PNP) hatchery permitted capacities vs actual eggs collected by year.

Action: VOTE: the agenda was **APPROVED** by unanimous consent.

4.0 Review recommendations from the December 5, 2013 meeting in Ketchikan.

Southern Southeast Regional Planning Team

- 1) Carried a motion to recommend approval of a SSRAA permit alteration request (PAR) to move a portion of existing Whitman Lake Hatchery coho salmon production that is traditionally released at Neets Bay to Anita Bay and Nakat Inlet.

Northern Southeast Regional Planning Team

- 1) Failed to carry a motion to recommend approval of a DIPAC PAR to add a new king salmon remote release site at Lena Cove.

5.0 Approve minutes from December 5, 2013 meeting in Ketchikan.

Action: Guggenbickler **MOVED** and Josephson **SECONDED** to recommend **APPROVAL** of the minutes from the December 5, 2013 meeting in Ketchikan. **VOTE:** the vote unanimously **CARRIED**.



6.0 Action Items:

Southern Southeast Regional Planning Team

6.1 Whitman Lake Hatchery PAR to increase permitted capacity from 1.5 million to 2.1 million green eggs and adds Ketchikan Creek as a remote release site for up to 100,000 king salmon smolt. Additional king salmon production from this PAR is currently slated for Neets Bay.

Introduction: (Bill Gass, Operations Manager, SSRAA) Deer Mountain Tribal Hatchery (DMTH), which has been run by Ketchikan Tribal Hatchery Corporation since 1994, closed in June 2013. DMTH was run as a three species hatchery with a permitted capacity of 133,000 king salmon eggs, with the goal of releasing 100,000 king salmon smolt into Ketchikan Creek. The hatchery provides SSRAA with the opportunity to produce 500,000 king salmon smolt. The Ketchikan Creek release will be 100,000 king salmon smolt and an additional 400,000 king salmon smolt will be available for release elsewhere. Neets Bay is considered the default remote release site as Neets Bay Hatchery has a permit to release 1.5 million king salmon and is currently only releasing 750,000 king salmon. Whitman Lake Hatchery (WLH) is the only hatchery that uses Chickamin River stock king salmon. Returns to DMTH would provide a backup king salmon brood source for WLH. It will take about five years before Chickamin River stock returns to DMTH can be used as a backup brood source for WLH. Previously, DMTH utilized Unuk River stock king salmon and those fish will be returning for the next several years. Once Chickamin River stock king salmon has been established at DMTH, the hatchery will be operated as a satellite facility to WLH.

Discussion: The department has processed, at SSRAA's request, a management feasibility analysis for DMTH, but has not received a hatchery permit application for DMTH yet. The department is concerned about the Unuk River not meeting escapement for the last two years. The department notes that an increase of king salmon releases in the area will almost certainly mean increased fishing effort, which could lead to harsher management action in order to meet escapement in the Unuk River. A department representative voiced concern that THAs have not been sampled well enough to determine if the department is adequately protecting wild stocks. The Neets Bay terminal harvest area (THA) common property fishery is sampled at approximately 2% for three years but the most recent two years the fishery was sampled at 10 to 20%; the cost recovery fishery is well sampled. In 2013, three wild Unuk River tags were recovered in the early rotations of the chum salmon common property fishery. A SSRAA representative pointed out that several systems are assessed in the area and the Unuk River is the only river not meeting escapement, which suggests that the problem is not tied to a specific fishery. The commercial fisheries in Neets Bay are targeting chum salmon and the addition of the return on 400,000 king salmon smolt is not going to attract more commercial effort to the Neets Bay chum salmon fishery. Furthermore, the fishery in the area that is least assessed for coded wire tags is the Clover Pass to Bushy Point sport fishery. In 2013, the primary component of the king salmon return was made up of five-year-old fish from brood year 2009 (BY09). There were a total of 36 wild Unuk River king salmon tags recovered from 53,000 BY09 Unuk River king salmon that were tagged. In 2014, there will be less chance of recovering Unuk River king salmon tags as there were only 17,000 BY10 fish tagged. The department pointed out the conundrum is we want an increased catch of king salmon in our fisheries, but as the number



of hatchery fish increases in the corridor fisheries, the amount of effort in those corridors will increase, and the number of wild fish intercepted in the process will increase. The SSRAA board would like to put the additional production where they would most likely be caught by the troll fleet; they don't necessarily have to go to Neets Bay.

Action: Josephson **MOVED** and Guggenbickler **SECONDED** to recommend **APPROVAL** of the Whitman Lake Hatchery PAR to increase permitted capacity from 1.5 million to 2.1 million green eggs and add Ketchikan Creek as a remote release site for up to 100,000 king salmon smolt. **VOTE:** the motion **CARRIED** by a vote of 5/0, with one vote abstaining.

6.2 Burnett Inlet Hatchery PAR to add Anita Bay as a remote release site for coho salmon incubated at Burnett Inlet Hatchery and reared at Neck Lake.

Introduction: This PAR is a housekeeping measure. At the fall meeting, the Southern Southeast Regional Planning Team (SSERPT) recommended approval of a SSRAA PAR to move Whitman Lake Hatchery coho salmon production that had traditionally been released at Neets Bay to Anita Bay. That PAR overlooked the portion of eggs that are taken at Whitman Lake Hatchery and then transported to Burnett Inlet Hatchery to hatch, before being transported for remote release.

Discussion: There was no discussion.

Action: Guggenbickler **MOVED** and Otte **SECONDED** to recommend **APPROVAL** of the Burnett Inlet Hatchery PAR to add Anita Bay as a remote release site for coho salmon incubated at Burnett Inlet Hatchery and reared at Neck Lake. **VOTE:** the motion **CARRIED** unanimously.

6.3 Port Saint Nicholas Hatchery PAR to add 20 million chum salmon eggs and adds a remote release site at Port Asumcion, on Baker Island.

Introduction: (Jeff Lundberg, Klawock River Hatchery manager, Prince of Wales Hatchery Association (POWHA)) The PAR is being requested to diversify POWHA's production. In 2013, Klawock River Hatchery had a record return of coho salmon but a single specie cost recovery is not covering the costs of operation. Port Saint Nicholas Hatchery is a small hatchery owned by the City of Craig and run by POWHA. There is room in the building and enough water to incubate chum salmon. There is no intention of building a broodstock program.

Discussion: Klawock River Hatchery has made significant changes to staff and fish culture practices in the last few years which have led to significant increases in production. In 2013, 8.2% of the commercial troll coho salmon harvest came from Klawock River Hatchery. POWHA is in serious financial trouble. The SSRAA board has committed to support POWHA with up to \$500,000 per year for the next three years in order to help maintain POWHA financially, which allows for continued production. The DIPAC board recently voted to contribute \$500,000 to SSRAA for the POWHA support. Adding a chum salmon program at Port Asumcion adds financial security to POWHA by diversifying their cost recovery options. The commercial fisheries will occur inside the bay proper, not in front of the bay. There will be some overlap in the return timing of these chum salmon and wild sockeye with Treaty and subsistence implications. The department will require otolith marking and sampling in the special harvest area which could include sampling of sockeye



salmon. Cost recovery catches will also be monitored for interception of pink and king salmon. The weir at Klawock River Hatchery can be monitored for increased chum salmon presence, but most chum salmon spawn below the weir. Port Armstrong Hatchery was mentioned as a possible broodstock source, but the department is more comfortable with the use of SSRAA chum salmon stock which originated with Carroll River fish. It will be a significant effort for SSRAA to provide 20 million chum salmon eggs annually. Discussion resulted in an estimate that it will take six to ten million chum salmon eggs, assuming normal marine survival rates, to provide a good financial return on the Port Asumcion program. A motion was carried to amend the PAR from 20 million chum salmon eggs to eight million chum salmon eggs. It was noted that there is no short-term solution for SSRAA to provide 20 million chum salmon eggs annually. Eight million eggs will provide a large enough return to evaluate the program and provide a cost recovery harvest.

Action: Peckham **MOVED** and Guggenbickler **SECONDED** to amend the PAR from 20 million to eight million chum salmon eggs. **VOTE:** the motion to amend **CARRIED** unanimously. **VOTE:** to recommend **APPROVAL** of the Port Saint Nicholas Hatchery PAR to add eight million chum salmon eggs and add a remote release site at Port Asumcion, on Baker Island **CARRIED** unanimously.

6.4 Klawock River Hatchery PAR to add a remote release site at Port Asumcion for up to two million coho salmon smolt.

Introduction: (Jeff Lundberg, Klawock River Hatchery manager, POWHA) This PAR was submitted in conjunction to the chum salmon PAR. It only makes financial sense to move coho salmon to Port Asumcion if the chum salmon infrastructure is in place. The idea of moving the coho salmon to Port Asumcion is to take pressure off the Klawock River. Moving two million coho salmon to Port Asumcion could remove 40,000 adult coho salmon that otherwise will return to Klawock River.

Discussion: The department suggested starting the project at 250,000 differentially tagged coho salmon smolt. The department would like to see increased tagging on the smaller release to evaluate straying into other west Prince of Wales systems, with the Klawock River being the most likely location for detecting any propensity of this release to stray. Klawock River Hatchery uses both otolith marks and coded wire tags to mark their coho salmon. The cost recovery harvest will be sampled for tags but that sampling will also indicate whether wild stock fish are being harvested in the cost recovery fishery. A gear group representative stated that the return on a 250,000 release didn't seem large enough to attract much commercial interest, which could lead to more of a straying problem. The POWHA representative pointed out that the cost recovery return on a 250,000 release might not be enough to pay for two employees for an additional three weeks, especially if the coho salmon contributions to the commercial fleet are as high as Klawock River Hatchery has been the last couple years (70%). A SSRAA representative penciled the numbers out to a 20,000 fish return, which means 6,000 fish to cost recovery, or roughly 40,000 pounds of coho salmon. A cost recovery harvest of that magnitude would gross approximately \$70,000 annually, which would pay for the fishery and allow for evaluation of the return, but would not generate enough money to help pay down POWHA's debt. A discussion revolved around the pros and cons of approving a permit that included step-wise increases versus approving a permit at a lower number knowing that an increase will be requested in a few years. The difficulty with step-wise increase permits is looking back on



them, years later, and trying to evaluate the intention of the trigger points and decide if the contingency has been met. It is much cleaner to approve a permit increase and understand that another increase will be requested after a few years of evaluating the returns.

Action: Josephson **MOVED** and Frenette **SECONDED** to **AMEND** the PAR from two million coho salmon smolt to 250,000 coho salmon smolt released at Port Asumcion. **VOTE:** the motion to amend **CARRIED** by a vote of 4/1, with one vote abstaining.

Josephson **MOVED** and Peckham **SECONDED** to recommend **APPROVAL** of the Port Saint Nicholas Hatchery PAR to add a remote release site at Port Asumcion for up to 250,000 coho salmon smolt. **VOTE:** the motion **CARRIED** unanimously.

Northern Southeast Regional Planning Team

6.5 Hidden Falls Hatchery PAR to amend conditional chum salmon capacity for Gunnuk Creek Hatchery from 45 million to 55 million green eggs.

Introduction: (Steve Reifentstahl, General Manager, NSRAA) Gunnuk Creek Hatchery is currently permitted to take 65 million chum salmon eggs, with 55 million of those eggs for release at Southeast Cove. This PAR would allow Hidden Falls Hatchery to take 55 million chum salmon eggs, incubate them to fry, and then release them at Southeast Cove.

Discussion: Southeast Cove special harvest area has been in existence since 1987. Gunnuk Creek Hatchery is not financially viable and is not planning to operate this year. The permitted chum salmon capacity to release at Southeast Cove remains with Gunnuk Creek Hatchery. This PAR acts as a stopgap to allow Hidden Falls Hatchery to take the chum salmon eggs for the Southeast Cove program while details of Gunnuk Creek Hatchery's future get sorted out. Last year, Hidden Falls Hatchery took 20 million chum salmon eggs that were transported to Gunnuk Creek Hatchery as eyed eggs, plus another 10 million chum salmon eggs that were hatched at Hidden Falls Hatchery and transported as fry to Southeast Cove as part of a cooperative program. This summer, NSRAA plans to take 35 million chum salmon eggs that will be hatched at Hidden Falls Hatchery and transported as fry to Southeast Cove. Hidden Falls Hatchery will require more incubators and some other additional infrastructure to produce the full 55 million eggs for Southeast Cove. Hidden Falls Hatchery will differentially otolith mark the chum salmon and sample the cost recovery harvest. There will be several years of overlap between Gunnuk Creek Hatchery produced fish and NSRAA production. The value of Gunnuk Creek Hatchery fish captured in cost recovery will be going to the Department of Commerce.

Action: Eliason **MOVED** and McDougall **SECONDED** to recommend **APPROVAL** of the Hidden Falls Hatchery PAR to amend conditional chum salmon capacity for Gunnuk Creek Hatchery from 45 million to 55 million green eggs. **VOTE:** the motion **CARRIED** unanimously.

6.6 Sawmill Creek Hatchery PAR to add 50 million chum salmon eggs and add Crawfish Inlet as a remote release site.



Introduction: (Steve Reifenhuth, General Manager, NSRAA) NSRAA has been searching for a new chum salmon program since 1999. Recently, NSRAA has submitted two management feasibility requests with the department; one in Excursion Inlet and the other for Pelican. The department did not review either of those sites favorably. NSRAA requested the department look at the geography of northern Southeast Alaska and come up with a list of possible sites the department might consider for a new pink or chum salmon program. The department produced a report with several areas that could possibly work for a new release site, but the document was not intended to be a guarantee that any PAR submitted for one of those locations will pass without question. NSRAA chose Crawfish Inlet as a new release site based on the report and the ability to utilize Sawmill Creek Hatchery. There will need to be several modifications made to the facility and there will be difficult operational challenges, but there is water available to handle the requested production. The PAR is requesting 50 million chum salmon eggs. Medvejie Creek Hatchery fall chum salmon stock will be used, which will require approximately 50,000 additional adult chum salmon for broodstock. The eggs would be taken at Medvejie Creek Hatchery and transported to Sawmill Creek Hatchery for incubation. In the spring, the fry will be moved from the incubators into transfer tanks, held for 24 hours, and then transported by boat to Crawfish Inlet for short-term rearing and release. Crawfish Inlet is approximately 40 miles by boat from Sawmill Creek Hatchery. The return on a 50 million chum salmon egg program, given current marine survival (2%) and price (\$.55/lb.), would generate a four million dollar fishery. If all four million dollars went to the troll fleet, they would be in their lower end of their target allocation of enhanced salmon range. The findings of the Alaska Board of Fisheries (**Southeast Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364) Finding #94-02-FB**) lists three tools for making adjustments to the distribution of harvest to meet allocation percent goals: 1) special harvest area management adjustments; 2) new enhanced salmon production; and 3) modification of enhancement projects production, including remote releases. This PAR uses the second and third tool to address the current allocation imbalance. This PAR also could test the theory heard many times during allocation discussions; that trollers can harvest all the returning fish in a THA if they are given exclusive rights to the area. NSRAA will ask for the THA to be permitted for all three gear groups, and the NSRAA board will use the THA as a tool to address allocation imbalances. Crawfish Inlet was chosen to minimize wild stock interaction. There should be very few non-target species caught in the THA located in the bay. There may be some non-target species caught in the troll fishery that is open in front of Crawfish Inlet in August. As the fishery targeting the Crawfish Inlet return is ramping up, sampling should be able to identify if too many non-target species are being harvested. If a problem is identified, the Crawfish Inlet fishery could be pulled back into the THA to minimize non-target species catch. The 50 million chum salmon egg increase was not chosen arbitrarily; the return on a 50 million chum salmon egg release is what is necessary to give the fishermen a return on investment that is large enough to justify the amount of money NSRAA plans to invest in this new project.

Discussion: The stock composition of Medvejie Creek Hatchery fall chum salmon is 18% three-year-olds. If 50 million chum salmon eggs are taken in 2014, the first return would be approximately 170,000 adults in 2018 (all three-year-olds), and 810,000 adults in 2019 (three and four-year-olds), and a full component (three, four, and five-year-olds) in 2020. Medvejie Creek Hatchery takes 20 million eggs for release at the hatchery to provide broodstock for the chum salmon program. It may be difficult to produce the entire 50 million chum salmon eggs for the Crawfish Inlet release every year. West Crawfish Inlet has a summer chum salmon return that is used by the department as an



indicator stock. The West Crawfish Inlet chum salmon stock was sampled last year as part of the straying study and found to have very few hatchery fish straying into the system. The department may require NSRAA to continue to sample the West Crawfish Inlet system after the straying study work is completed. The department feels that 20 million chum salmon eggs is a conservative baseline level for evaluation of a new chum salmon program. An NSRAA gear representative noted there is a difference when comparing Crawfish Inlet and Port Asumcion; the Port Asumcion project is primarily trying to generate cost recovery for POWHA while the Crawfish Inlet project is being developed to create commercial fishing opportunity. The department's biggest concern with this project is potential straying into the West Crawfish Inlet chum salmon indicator stream. The department would like to start with lower numbers and ramp the program up if no problems develop when the fish return. An NSRAA gear representative noted that if the return is not large enough to attract gear effort, especially with the troll fleet, then the evaluation of the fishery may not be accurate. The ideological argument; in order to truly test a new program, the program has to be tested at full production to see if there are any problems, but testing at full production requires an understanding that the program would ramp down if problems are discovered. An NSRAA representative noted that the 50 million chum salmon egg number was derived from a business goal. Furthermore, the department adopting an arbitrary 20 million egg starting point for chum salmon projects changes how an association can operate. At this point the discussion revolved around how the department chose the starting point of 20 million and whether there was a chance of increasing that number. NSRAA felt the number was arbitrary and a complete surprise, especially as it was presented as policy or a long standing guideline. The department projected a 500,000 adult chum salmon return from a 20 million egg program, which they feel is a significant enough return to evaluate the program while also making contributions to the commercial fleet. A department motion to amend the PAR from 50 million to 20 million chum salmon eggs for Crawfish Inlet failed to carry by a vote of 3-3. The votes were split between the department and industry representatives. The PAR was tabled until the department had a chance to talk with genetics staff.

Sitka Tribe of Alaska (STA) submitted a letter in opposition to the NSRAA PAR to take 50 million chum salmon eggs for release at Crawfish Inlet. STA believes this release site will have a negative impact on resident salmon stocks in Crawfish Inlet, on subsistence sockeye salmon returning to Necker Bay, on the Sitka Sound herring stock, and the wilderness character of the area surrounding Crawfish Inlet.

The funding for the current straying study should take the project through 2016. Additional funding is available with the goal of continuing the project through 2023. The West Crawfish Inlet summer chum salmon are in the stream by the first week of August, which should provide segregation from the Medvejie Creek Hatchery fall chum salmon. The department was willing to agree to a 30 million egg amendment if: 1) NSRAA commits to sampling the West Crawfish Inlet index stream, if it is not already being sampled in the current straying study; 2) the terminal harvest will be sampled for wild stock interception; 3) NSRAA will be required to clean up the special harvest area if there is a buildup of returning hatchery chum salmon. NSRAA staff suggested a management plan that provides a cleanup fishery by cost recovery seine or commercial net gear, as necessary, to minimize straying concerns and evaluate the efficiency of the troll fishery.

Action: McDougall **MOVED** and Eliason **SECONDED** to **AMEND** the Sawmill Creek Hatchery PAR from 50 million to 30 million chum salmon eggs and add a remote release site at Crawfish



Inlet. **VOTE:** the motion to amend **CARRIED** unanimously. The vote to recommend approval **CARRIED** unanimously.

6.7 Medvejie Creek Hatchery PAR to add Crawfish Inlet as a remote release site for up to 600,000 Andrews Creek stock Chinook salmon smolt.

Introduction: (Scott Wagner, Operations Manager, NSRAA) The PAR adds a remote release site in Crawfish Inlet of up to 600,000 Andrews Creek stock king salmon smolt of current Medvejie Creek Hatchery production. This project works in conjunction with the chum salmon project. The freshwater rearing of these king salmon occurs at Medvejie Creek Hatchery. The fish will be transported to Crawfish Inlet and held for approximately three weeks of saltwater rearing before release. The king salmon project will utilize the same pen complex that was used for rearing chum salmon. Currently, this king salmon production is released at Halibut Point Marine and Bear Cove.

Discussion: Currently, there is not much king salmon troll effort in Crawfish Inlet in the summer fishery. Necker Bay and Whale Bay appear to have more king salmon troll effort. NSRAA king salmon are coded-wire-tagged at a rate of 9-10%. Commercial king salmon fisheries are sampled well for coded wire tags.

Action: McDougall **MOVED** and Stroosma **SECONDED** to recommend **APPROVAL** of the Medvejie Creek Hatchery PAR to add Crawfish Inlet as a remote release site for up to 600,000 Andrews Creek stock Chinook salmon smolt. **VOTE:** the motion **CARRIED** unanimously.

6.8 Port Armstrong Hatchery PAR to increase permitted capacity of pink salmon from 85 million to 135 million green eggs and adds Port Herbert as a remote release site for up to 85 million eggs.

Introduction: (Jake Musslewhite, Operations Manager, Armstrong-Keta, Inc. (AKI)) Port Armstrong Hatchery is currently permitted for 85 million pink salmon eggs with their progeny all released from the hatchery. This PAR increases the permitted capacity of pink salmon eggs to 135 million eggs and adds Port Herbert as a remote release site where AKI plans to operate cost recovery operations. The increase of 50 million pink salmon eggs was chosen for financial reasons. The pens will be located in front of Nakvassin Creek, which is a partial barrier system with sockeye salmon as well as summer coho salmon. Port Armstrong Hatchery pink salmon have a later return timing than the sockeye and coho salmon returns to Nakvassin Creek. Cost recovery would begin in mid-August, which is after most sockeye salmon have moved into the lake and the coho salmon staging in front of the creek would be protected from cost recovery harvest. Moving the progeny of 85 million pink salmon eggs to Port Herbert shifts the production currently happening at Port Armstrong up a couple bays to the north, further away from the Port Alexander area troll fishery. The returning adults should be caught in the same fisheries as the current release and may increase seine catches further up the eastern Baranof Island shoreline. Port Armstrong Hatchery has had a long-term decline in pink salmon marine survivals, possibly due to lack of near-shore marine habitat or predation. Diversifying the pink salmon release could lead to better marine survivals. The initial plan is to move the progeny of 50 million pink salmon eggs to Port Herbert and release the progeny of 35 million eggs from the hatchery. The hatchery can incubate an additional 20 million pink salmon eggs with relatively minor



modifications to the hatchery. The other 30 million pink salmon eggs will require major modifications or new infrastructure.

Discussion: The department position on the Port Armstrong Hatchery PAR is to limit the increase in pink salmon eggs to 20 million and add Port Herbert as a remote release site for progeny of 20 million eggs. An AKI representative noted that limiting the project to 20 million pink salmon eggs gives the project only marginal financial viability. The project is designed to increase common property contribution and diversify cost recovery harvest. The donor stock for Port Armstrong Hatchery pink salmon is Sashin Creek, which is approximately five miles away from Port Herbert. Concern was expressed from an industry representative about trying to pencil out a financial plan for a new project when the department is going to start with an arbitrary low number and then not commit to when another increase can happen or how big that increase could be. The department will continue to review each PAR on a case by case basis. AKI would like to request an increase in chum salmon for a release at Port Lucy. It will be a number of years before that program would be able to contribute any fish. The pink salmon release at Port Herbert will make contributions much more quickly. Some people in the upper levels of the department are not comfortable permitting facilities for more eggs than they are capable of producing, thus creating unused capacity on the books. Port Armstrong Hatchery is capable of rearing an additional 20 million eggs at this time. A department representative suggested we approve a 20 million egg increase now, because that is what can be incubated this year, and then be open for another request for increase at the fall meeting. A discussion revolved around whether or not the increase of 20 million eggs is going to limit the release at Port Herbert to 20 million eggs. The department contacted the Department of Genetics over the lunch break to discuss this PAR. Port Armstrong Hatchery, Sashin Creek (pink salmon donor stock), and Port Herbert are all within ten miles of each other. Department of Genetics was more concerned with the area increase than the number released at Port Herbert given that the population structure is much shallower for pink salmon than it is with chum salmon. The department suggested an increase of 20 million eggs (85 million pink salmon eggs to 105 million pink salmon eggs) with the progeny of up to 55 million pink salmon eggs being released at Port Herbert. The Port Herbert release will be differentially marked from the Port Armstrong Hatchery release. Sashin Creek will be sampled to initially look for differential stray rates between the two release sites into Sashin Creek. If significant or differential stray rates are detected, an increased sampling effort will be implemented. The Port Herbert terminal fishery will be sampled for wild stock interception. AKI will be required to clean up the special harvest area if there is a buildup of returning hatchery fish.

The Chatham Trollers submitted a letter in opposition the Port Armstrong Hatchery PAR. They noted that shifting the project from Port Lucy to Port Herbert removes their objection regarding shifting seiners into a troll only area. However they still oppose the project based on: 1) the increase in pink salmon reducing the available feed fish in the area, increasing the number of pink salmon caught during the coho salmon troll fishery, and the increased seine interception of treaty king salmon while pursuing pink salmon; 2) the stray potential of the pink salmon as they pulse in and out of a bay with a wide entrance (unlike Port Armstrong that has a narrow entrance which allows the fish to be corralled as soon as they enter the bay for the first time); 3) the increased time the seine fleet will spend in south Chatham Strait because of the added pink salmon production will preclude trolling in the area during the peak of the coho salmon return.



Dave Turcott, a trollerman from Sitka, submitted a letter in support of the Port Armstrong Hatchery PAR. He noted he has been trolling the area since 1967, served briefly on the AKI board, and helped start NSRAA while he was teaching marine science at Sheldon Jackson College. He does not believe this increased pink production will negatively impact the productivity of the region. He views this project as a way to make AKI more financially stable, which will allow them to continue to produce king and coho salmon for the troll fleet.

Amendment: At the fall 2014 meeting in Petersburg, the RPT unanimously voted to approve an amendment acknowledging the SSRAA troll representative stating that Alaska Trollers Association was opposed to the AKI pink salmon project.

Action: Josephson **MOVED** and Frenette **SECONDED** to **AMEND** the Port Armstrong Hatchery PAR to increase permitted capacity of pink salmon from 85 million to 105 million green eggs and add Port Herbert as a remote release site for up to 55 million eggs. **VOTE:** the motion to amend **CARRIED** unanimously. The vote to recommend approval **CARRIED** unanimously.

Joint Southeast Regional Planning Team

6.9 Update on the current state of enhanced salmon allocation.

Introduction: (Flip Pryor, Region One Resource Development Biologist, ADF&G) distributed a Power-Point presentation entitled “Preliminary 2013 and Final 2012 Allocation Estimates of Enhanced Salmon in Southeast Alaska” prior to the meeting. The allocation value is equal to the number of fish harvested, multiplied by the average weight, multiplied by the price per pound. If applicable, the value of roe sold from special harvest areas (SHAs) is added into the appropriate value equation. The Hidden Falls tax assessment value is subtracted from the NSRAA chum salmon seine value. The number of fish harvested by gear group comes from the hatchery operator annual reports. The average weights come from the Region 1 BOF Report and from SSRAA (applied to SSRAA produced chum salmon in net fisheries). All the prices come from the Commercial Fisheries Entry Commission.

The target troll allocation is 27–32%. The final 2012 troll value is 11%, which brings the 2008–2012 five-year average to 16%. The preliminary 2013 value is 24%, which brings the preliminary 2009–2013 five-year average to 17%.

The target seine allocation is 44–49%. The final 2012 seine value is 49%, which brings the 2008–2012 five-year average to 43%. The preliminary 2013 value is 40%, which brings the preliminary 2009–2013 five-year average to 43%.

The target gillnet allocation is 24–29%. The final 2012 gillnet value is 39%, which brings the 2008–2012 five-year average to 41%. The preliminary 2013 value is 36%, which brings the preliminary 2009–2013 five-year average to 40%.

Discussion: To account for the tax assessment, the annual amount of the Hidden Falls Hatchery cost recovery goal is subtracted from the gross value of the Hidden Falls Hatchery chum salmon seine fishery.



6.10 Chum salmon troll fishery management plan analysis.

Introduction: (Pattie Skannes, Regional Troll Biologist, ADF&G) A handout was distributed before the meeting titled, “Troll Chum Salmon Fishery Analysis”. Prior to the Alaska Board of Fisheries (BOF) meeting in 2012, the JSERPT requested the department collect data on troll chum salmon fisheries from 2012-2014 and develop draft management plans for fisheries at Homeshore, West Behm Canal, Cholmondeley Sound and other fisheries that may develop. Through the 2012 BOF process, the District 12 and District 14 Enhanced Chum Salmon Troll Fisheries Management Plan was adopted and will sunset on December 31, 2014. This analysis includes, a listing of current chum salmon management plans, troll chum and king salmon harvest, effort and stock composition data for District 12 and 14 fisheries, since those fisheries are managed for both chum and king salmon. Wild chum salmon escapements and escapement goals are also discussed.

Discussion: The department provided these data as an informational item and will continue to collect data again in 2014. A gillnet representative noted that in 2013, only 80% of the chum salmon harvested in the Homeshore fishery were otolith marked. Furthermore, a portion of the remaining 20% (59,066 chum salmon) would almost certainly be harvested by the gillnet fleet, so if the Homeshore troll fishery is to continue, the unmarked fish should somehow be included in the allocation calculation. A department representative noted the Homeshore example is what he has been stressing for years; new or expanded fisheries targeting hatchery fish may have unintended consequences, so we need to proceed with caution when considering new or increased hatchery releases. There was a discussion, driven by the gillnet representatives, about opening up the allocation plan and possibly include the value of wild fish caught in fisheries targeting enhanced fish. There was a discussion about possible hook mortality on juvenile king salmon caught during the chum salmon troll fishery. Several people attending the meeting were aware that Joe Orsi (NOAA) has observed a relatively high rate of juvenile king salmon with hook damage while conducting the Southeast Coastal Monitoring Study, which is a near shore trawl study that collects data at set locations every summer.

6.11 Calculations of king and coho salmon values in the allocation formula.

Introduction: There has been some question about whether or not the true value of king and coho salmon is being captured in the allocation formula. A specific example of the possible problem is troll caught king salmon. The king salmon caught in the spring fishery are primarily enhanced fish and have a higher value per fish than king salmon caught in the summer fishery, where the majority of king salmon are harvested. If average prices are used for the entire season is the value of the enhanced king salmon caught in the spring fishery being fairly calculated?

Discussion: A meeting is scheduled for tomorrow (April 9th) to discuss what the perceived problems are and how they might be addressed. Attendance will include the department, hatchery representatives, and CFEC staff. The goal was to address the problem after the December meeting and have the solutions figured out before this meeting, but the issue is complex and the logistics of scheduling the meeting did not work out to accomplish that goal.



6.12 Joint Southeast Regional Planning Team report on Southeast Allocation of Enhanced Salmon.

Introduction: The JSERPT annually writes a letter to the commissioner on the status of allocation in Southeast Alaska. That document usually includes a list of things that have happened recently or are about to happen that may have an effect on the allocation situation.

Discussion: A discussion occurred around what increases in production are expected to return in the next few years. SSRAA recently added two million additional fall coho salmon production to be released at Neets Bay, Anita Bay, and Nakat Inlet. In 2014, returns from 1.2 million of that increase will be coming back to Neets Bay. The Anita Bay and Nakat Inlet increase will start to return in 2015. The SSRAA PAR that was recommended for approval today increases overall king salmon production by 400,000 smolt. That increase could be in the water in two years. NSRAA has recently made some changes to coho salmon production but no increased returns are expected in 2014. Deer Lake has increased up to a three million egg goal. Hidden Falls Hatchery is experimenting with overwintering coho salmon in saltwater. Sawmill Creek Hatchery continues to build its broodstock program which will lead to increased releases in the next few years. NSRAA has also reinstated the coho salmon lake rearing program, which puts fry into several lakes on southern Baranof Island. In 2014, Macaulay Hatchery (DIPAC) will release an additional 750,000 coho salmon over their traditional release number.

The gear group representatives stayed behind after the rest of the agenda was completed to continue to craft the letter to the commissioner. The letter below summarizes the discussions and conclusions of the Joint Southeast Regional Planning Team:

Rough Draft 4/08/14

Letter to Commissioner from RPT.

The JRPT reviewed the final allocation estimates of the value of enhanced salmon in Southeast Alaska for 2012 and the preliminary estimates for 2013. The gillnet fleet is above its allocation range and has been for more than three consecutive years of five-year rolling averages. The seine and troll fleets continue to be below their allocation ranges for more than three consecutive years of five-year rolling averages. In the last few years the seine percentage has been increasing and the gillnet percentage has been decreasing. The troll fleet has been well below its range in five-year rolling averages since the establishment of the allocation plan, although the troll fleet increased its value substantially in 2013.

We note the following.

The seine opportunities allowed at Amalga Harbor have helped the seine fleet get closer to its range. Beginning in 2014 the first returns of an additional 10 million chum salmon release to Kendrick will help the seine fleet, and the first returns of an additional 12 million chum salmon release at Neets Bay will help all three fleets, but especially trollers and seiners.



Efforts continue to be made to improve chum salmon harvest opportunities for the troll fleet and the troll fleet is increasing its success at harvesting chum salmon.

SSRAA has established a Neets Bay Harvest Fund, which is intended to provide regular and increased chum salmon harvesting opportunities for trollers. DIPAC has contributed to this fund. The fund will also increase opportunities for net fishermen, but will likely help seiners more than gillnetters.

Hatchery operators continue to increase production of Chinook and coho salmon, which are the targeted troll species. SSRAA is pursuing operation of Deer Mountain Hatchery which could lead to the production of an additional 400,000 Chinook salmon smolts. The increased coho salmon releases at Neets Bay, Anita Bay, and Nakat Inlet were a result of an industry consensus position adopted by the Board of Fisheries in 2008. In 2014, progeny from 1.2 million additional coho salmon eggs will be returning to Neets Bay. In 2015, progeny from 800,000 additional coho salmon eggs will be returning to Anita Bay and Nakat Inlet. Increased coho salmon production at Deer Lake and changes to coho salmon rearing strategies at Hidden Falls Hatchery should lead to increased coho salmon returns in 2015. Sawmill Creek Hatchery coho salmon broodstock development continues to build which should lead to increased coho salmon releases in the next few years. DIPAC will release an additional 750,000 coho salmon this spring in association with building improvements made to the Macaulay Hatchery.

Increases in chum salmon production have been permitted and in the future will help all three gear groups. Chum salmon releases at Crawfish Inlet are intended to significantly help trollers by giving the troll fleet some preference of harvest in the THA and exclusivity of harvest in nearby waters.

We recognize that all of the changes in production and fishing opportunities may not get the fleets within their ranges. Certainly there is substantial effort in this regard and it appears likely that the efforts will help. This is assuming things out of the control of the industry and the department (like varying prices, wild stock opportunities, and survival rates) remains stable.

The JRPT had a long and serious discussion about the allocation plan, the difficulties in getting the troll fleet in their range and that there may be a need to ask the Board of Fish to reconvene the allocation task force for an open discussion of the Southeast Enhanced Salmon Allocation Plan. This will be an agenda item for the JRPT at the fall 2014 meeting.

The JRPT will submit three placeholder proposals (5 AAC 33.376. District 13: Deep Inlet Terminal Harvest Area Salmon Management Plan, 5 AAC 33.383 District 7: Anita Bay Terminal Harvest Area Salmon Management Plan, 5 AAC 29.114 District 12 and Districts 14 Enhanced Chum Salmon Troll Fisheries Management Plan) regarding the sunseting regulations by the April 10th deadline. In December the JRPT will review all proposals related to enhanced allocation and will consider recommending actions to the Board of Fisheries.

Action: Peckham **MOVED** and Stroosma **SECONDED** to **APPROVE** the letter on the status of allocation of enhanced salmon in Southeast Alaska and submit it to the commissioner. **VOTE:** the motion **CARRIED** by a vote of 5-0.



7.0 Information and Discussion Items.

7.1 Keta River king salmon broodstock development project update.

Introduction: (John Joyce, NOAA/Auke Bay Lab) In 2013, the first egg take occurred on the Keta River king salmon broodstock development project with logistical support from ADF&G and AKI. There are plans for egg takes over next two years. The 2013 permit was for 20 pair of king salmon and gametes were extracted from 17 females and 20 males. Approximately 60,000 fry were recently ponded into freshwater rearing ponds. The interest in the Keta River stock is based on the large size of the adults and high abundance of natural zero check fish. If the broodstock is successfully developed for production hatchery releases, it would increase the overall genetic diversity of the hatchery program. The plan is to do a traditional one check rearing program with the Keta River stock at Little Port Walter and compare the success of the Keta River fish with the Unuk River stock king salmon that are currently reared at Little Port Walter. The Unuk River stock king salmon program has 30 years of baseline data from production at Little Port Walter. In the second and third year, the broodstock goes up to 40 pair. If a full complement of eggs is collected, a portion of those will be raised as traditional one checks and a portion will be raised as zero checks. The success of both rearing methods will be compared to the success of the Unuk River stock king salmon.

Discussion: There was a discussion about starting a broodstock with just 20 pair. The lower number was a product of poor escapement in 2013. The Unuk River stock was founded on 250 base pair, but the Chickamin River stock was founded on a base of just eight pair. Remote egg takes are dependent on run strength and can be further limited by logistical problems. The fish were in the river during the last week of August and the first week of September.

7.2 Armstrong-Keta, Inc. future production plans.

Introduction: (Bart Watson, General Manager, AKI) AKI would like to increase contributions to common property fisheries and possibly increase marine survivals by adding remote release sites. Originally, AKI was planning on submitting two additional PARs for review at this meeting; one for a chum salmon release at Port Lucy, and a pink salmon release in Port Malmesbury. AKI plans to submit a PAR to increase chum salmon capacity and add Port Lucy as a remote release site at the fall RPT meeting.

Discussion: There was no additional discussion.

7.3 Ron Josephson's presentation.



Introduction: (Ron Josephson; Section Chief, Fisheries Monitoring, Permitting and Development; ADF&G) Ron put together a series of graphs from the enhancement program annual report. The graphs show the difference between permitted capacity and actual production by year since the 1970's. Hatchery production increased dramatically in the 1980's. There was a period in the 1990's when unused permitted capacity was taken off the books. Overall hatchery production has been relatively stable since the early 1990's, despite having some recent increases in permitted capacity. The statewide pink salmon production has been stable but under permitted capacity since the late 1980's. Regions such as Kodiak, Cook Inlet, and Southeast have been producing pink salmon below permitted capacity in most years, while Prince William Sound has been operating at permitted capacity since the late 1990's. Statewide, chum salmon permitted capacity has had slow steady growth since the late 1990's. Chum salmon production has been generally much closer to permitted capacity levels than pink salmon production.

Discussion: None

8.0 Additional Business: None

9.0 Next meeting is scheduled for the first week of December and will be associated with the Seine and Gillnet Task Force meetings.

10.0 Adjourn the main meeting at 4:30 p.m. Industry representatives of the JSERPT worked on the letter to the commissioner until 6:30 p.m.



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Fish and Game

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Date: April 23, 2014

To: Cora Campbell
Commissioner

Thru: Jeff Regnart, Director
Division of Commercial Fisheries

Charlie Swanton, Director
Division of Sport Fish

From: Flip Pryor, Southeast Regional Resource Development Biologist

Subject: Joint, Northern, and Southern Southeast regional planning teams spring 2014 meeting.

The Joint, Northern, and Southern Southeast regional planning teams held their spring meetings concurrently on April 8, 2014 at the Aspen Suites Hotel in Juneau. This memorandum contains four recommendations by the Southern Southeast Regional Planning Team (SSERPT) concerning private nonprofit hatchery permit alteration requests (PARs); four recommendations by the Northern Southeast Regional Planning Team (NSERPT) concerning PARs; a letter from the Joint Southeast Regional Planning Team (JSERPT) on the status of allocation of enhanced salmon; and a summary of information and discussion items.

Recommendation 1: Southern Southeast Regional Planning Team, by a vote of 5-0 with one abstaining, recommends approval of a Southern Southeast Regional Aquaculture Association (SSRAA) PAR to increase king salmon capacity at Whitman Lake Hatchery by 600,000 green eggs, from 1.5 million to 2.1 million green eggs; add Ketchikan Creek (Deer Mountain Hatchery location) as a remote release site for up to 100,000 Chickamin River stock king salmon smolt; with remaining smolt from this increase released at Neets Bay.

SSRAA is exploring taking over operation of Deer Mountain Tribal Hatchery which closed in 2013. SSRAA would run the facility as a king salmon hatchery capable of producing 500,000 smolt annually. The intention would be to continue a release of 100,000 king salmon smolt from the hatchery and produce 400,000 smolt for release at a remote release site.



Recommendation 2: Southern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of a SSRAA PAR to add Anita Bay as a remote release site for fall coho salmon from Burnett Inlet Hatchery.

This PAR is a housekeeping measure. At the fall meeting, the SSERPT recommended approval of a SSRAA PAR to move Whitman Lake Hatchery coho salmon production that had traditionally been released at Neets Bay to Anita Bay. That PAR overlooked the portion of eggs that are taken at Whitman Lake Hatchery and then transported to Burnett Inlet Hatchery to hatch and be reared in Neck Lake, before being transported to a remote release site. This PAR has no effect on current permitted egg or overall release numbers.

Recommendation 3: Southern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of an amended Prince of Wales Hatchery Association (POWHA) PAR to add eight million chum salmon eggs to the Port Saint Nicholas Hatchery permit and add Port Asumcion as a remote release site. Stipulations include: marking fish, evaluating harvest for hatchery and wild stock catch, and cleaning up the special harvest area as necessary.

The original request was for 20 million chum salmon eggs, but was amended to 8 million eggs by the SSERPT. The PAR is being requested to add financial security to POWHA by diversifying their cost recovery options. In 2013, Klawock River Hatchery had a record return of coho salmon, contributing 8.2% of the commercial troll coho salmon harvest, but still did not achieve their cost recovery goal. Both SSRAA and Douglas Island Pink and Chum, Inc. (DIPAC) have committed to support POWHA financially, which allows for continued production. SSRAA RPT representatives suggested the project start at eight million chum salmon eggs, as SSRAA has no short-term solution for providing 20 million chum salmon eggs annually. Eight million eggs will provide a large enough return to evaluate the program and provide some cost recovery harvest.

Recommendation 4: Southern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of an amended POWHA PAR to add Port Asumcion as a remote release site for up to 250,000 Klawock River Hatchery coho salmon. Stipulations include: differentially marking fish, evaluating harvest for hatchery and wild stock catch, monitor Klawock River weir for Port Asumcion release marks, and to clean up the special harvest area if necessary.

The original request was for a release of up to two million coho salmon smolt but the SSERPT, by a vote of 4-1 with one abstaining, amended two million to a release of up to 250,000 Klawock River Hatchery coho salmon smolt at Port Asumcion. This PAR was submitted in conjunction with the chum salmon PAR for Port Asumcion. The intent of the original PAR was to take pressure off the Klawock River. Moving two million coho salmon to Port Asumcion could remove 40,000 adult coho salmon that otherwise will return to Klawock River. The department suggested starting the project at 250,000 coho salmon smolt. An estimated return from a 250,000 coho salmon smolt release would generate approximately \$70,000 of cost recovery annually, which should pay for the new program but is not likely to generate additional money to pay down any of POWHA's debt.



Recommendation 5: Northern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of a Northern Southeast Regional Aquaculture Association (NSRAA) PAR to amend the existing conditional Hidden Falls Hatchery permit to allow 45 million chum salmon eggs for Gunnuk Creek Hatchery to allow 55 million chum salmon eggs for Gunnuk Creek Hatchery.

Gunnuk Creek Hatchery is not planning to operate this year. Gunnuk Creek Hatchery is currently permitted to take 55 million chum salmon eggs for release at Southeast Cove. This PAR acts as a stopgap to allow Hidden Falls Hatchery to take the chum salmon eggs for the Southeast Cove program while details of Gunnuk Creek Hatchery's future get sorted out. There is no overall increase in production at Southeast Cove.

Recommendation 6: Northern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of an amended NSRAA PAR to add 30 million chum salmon green eggs to the Sawmill Creek Hatchery permit and adds Crawfish Inlet as a remote release site. Stipulations include: differentially marking fish, continued sampling of West Crawfish Inlet for strays once ADF&G sampling programs have ceased, and cleanup of the special harvest area if there is a buildup of returning hatchery chum salmon.

NSRAA has been searching for a new chum salmon program since 1999. NSRAA chose Crawfish Inlet as a new release site based on a department generated report on possible pink and chum salmon release sites in northern Southeast Alaska and the ability to utilize Sawmill Creek Hatchery. NSRAA estimates the return on a 50 million chum salmon egg program, given current marine survival (2%) and price (\$.55/lb.), would generate a four million dollar fishery. If all four million dollars went to the troll fleet, they would be in their target allocation of enhanced salmon range. NSRAA will ask for the terminal harvest area (THA) to be permitted for all three gear groups, and the NSRAA board will use the THA as a tool to address allocation imbalances. A department generated motion to amend the PAR to 20 million eggs failed to carry. The department projected a 500,000 adult chum salmon return from a 20 million egg program, which they feel is a significant enough return to evaluate the program and also make contributions to the commercial fleet. The original request was to add 50 million fall chum salmon eggs to the Medvejie Creek Hatchery permit, but after considerable debate and a recess for lunch, the NSERPT, by a vote of 6-0, amended the number to 30 million.

Recommendation 7: Northern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of a NSRAA PAR to add Crawfish Inlet as a remote release site for up to 600,000 Andrews Creek stock king salmon smolt to the Medvejie Creek Hatchery permit.

This PAR does not increase permitted capacity of Medvejie Creek Hatchery. The king salmon project will utilize the same pen complex that is used for rearing chum salmon. Currently, this king salmon production is released at Halibut Point Marine and Bear Cove.

Recommendation 8: Northern Southeast Regional Planning Team, by a vote of 6-0, recommends approval of an AKI PAR to increase pink salmon capacity from 85 million to 105 million green eggs (20 million egg increase) and add Port Herbert as a remote release site for progeny from up to 55



million eggs to the Port Armstrong Hatchery permit. Stipulations include: require differential marking for evaluation of returns, sampling adult pink salmon returns at Sashin Creek, and cleanup the special harvest area in Port Herbert if any buildup of hatchery-produced pink salmon should occur.

Port Armstrong Hatchery has had a long-term decline in pink salmon marine survivals, possibly due to lack of near-shore marine habitat or predation. Diversifying the pink salmon release could lead to better marine survivals. The increase of 50 million pink salmon eggs was chosen for financial reasons. Moving the progeny of 85 million pink salmon eggs to Port Herbert shifts the production currently happening at Port Armstrong north, further away from the Port Alexander area troll fishery. The hatchery can incubate an additional 20 million pink salmon eggs with relatively minor modifications to the hatchery. The other 30 million pink salmon eggs will require major modifications or new infrastructure. The department suggested an increase of 20 million eggs with the progeny of up to 55 million pink salmon eggs being released at Port Herbert. The original PAR was amended by the NSERPT after discussion to only allow an increase of 20 million eggs.

Recommendation 9: Joint Southeast Regional Planning Team, by a vote of 5-0, to approve a letter on the status of allocation of enhanced salmon in Southeast Alaska and submit it to the commissioner (Department members are neutral on allocation issues and do not vote on the approval of this letter. One gear group representative left the meeting before the letter was completed).

Letter to the Commissioner of ADF&G from JSERPT 4/8/2014.

The JSERPT reviewed the final allocation estimates of the value of enhanced salmon in Southeast Alaska for 2012 and the preliminary estimates for 2013. The gillnet fleet is above its allocation range and has been for more than three consecutive years of five-year rolling averages. The seine and troll fleets continue to be below their allocation ranges for more than three consecutive years of five-year rolling averages. In the last few years the seine percentage has been increasing and the gillnet percentage has been decreasing. The troll fleet has been well below its range in five-year rolling averages since the establishment of the allocation plan, although the troll fleet increased its value substantially in 2013.

We note the following.

The seine opportunities allowed at Amalga Harbor have helped the seine fleet get closer to its range. Beginning in 2014 the first returns of an additional 10 million chum salmon release to Kendrick will help the seine fleet, and the first returns of an additional 12 million chum salmon release at Neets Bay will help all three fleets, but especially trollers and seiners.

Efforts continue to be made to improve chum salmon harvest opportunities for the troll fleet and the troll fleet is increasing its success at harvesting chum salmon.

SSRAA has established a Neets Bay Harvest Fund, which is intended to provide regular and increased chum salmon harvesting opportunities for trollers. DIPAC has contributed to this fund. The fund will also increase opportunities for net fishermen, but will likely help seiners more than gillnetters.



Hatchery operators continue to increase production of Chinook and coho salmon, which are the targeted troll species. SSRAA is pursuing operation of Deer Mountain Hatchery which could lead to the production of an additional 400,000 Chinook salmon smolts. The increased coho salmon releases at Neets Bay, Anita Bay, and Nakat Inlet were a result of an industry consensus position adopted by the Board of Fisheries in 2008. In 2014, progeny from 1.2 million additional coho salmon eggs will be returning to Neets Bay. In 2015, progeny from 800,000 additional coho salmon eggs will be returning to Anita Bay and Nakat Inlet. Increased coho salmon production at Deer Lake and changes to coho salmon rearing strategies at Hidden Falls Hatchery should lead to increased coho salmon returns in 2015. Sawmill Creek Hatchery coho salmon broodstock development continues to build which should lead to increased coho salmon releases in the next few years. DIPAC will release an additional 750,000 coho salmon this spring in association with building improvements made to the Macaulay Hatchery.

Increases in chum salmon production have been permitted and in the future will help all three gear groups. Chum salmon releases at Crawfish Inlet are intended to significantly help trollers by giving the troll fleet some preference of harvest in the THA and exclusivity of harvest in nearby waters.

We recognize that all of the changes in production and fishing opportunities may not get the fleets within their ranges. Certainly there is substantial effort in this regard and it appears likely that the efforts will help. This is assuming things out of the control of the industry and the department (like varying prices, wild stock opportunities, and survival rates) remains stable.

The JSERPT had a long and serious discussion about the allocation plan, the difficulties in getting the troll fleet in their range and that there may be a need to ask the Board of Fish to reconvene the allocation task force for an open discussion of the Southeast Enhanced Salmon Allocation Plan. This will be an agenda item for the JSERPT at the fall 2014 meeting.

The JSERPT will submit three placeholder proposals (5 AAC 33.376 District 13: Deep Inlet Terminal Harvest Area Salmon Management Plan, 5 AAC 33.383 District 7: Anita Bay Terminal Harvest Area Salmon Management Plan, 5 AAC 29.114 District 12 and Districts 14 Enhanced Chum Salmon Troll Fisheries Management Plan) regarding the sunseting regulations by the April 10th deadline. In December the JSERPT will review all proposals related to enhanced allocation and will consider recommending actions to the Board of Fisheries.

Informational Items

Joint Southeast Regional Planning Team reviewed the current state of enhanced salmon allocation.

The target troll allocation is 27–32%. The final 2012 troll value is 11%, which brings the 2008–2012 five-year average to 16%. The preliminary 2013 value is 24%, which brings the preliminary 2009–2013 five-year average to 17%.



The target seine allocation is 44–49%. The final 2012 seine value is 49%, which brings the 2008–2012 five-year average to 43%. The preliminary 2013 value is 40%, which brings the preliminary 2009–2013 five-year average to 43%.

The target gillnet allocation is 24–29%. The final 2012 gillnet value is 39%, which brings the 2008–2012 five-year average to 41%. The preliminary 2013 value is 36%, which brings the preliminary 2009–2013 five-year average to 40%.

Joint Southeast Regional Planning Team reviewed an analysis of chum salmon troll fishery management.

Prior to the Alaska Board of Fisheries (BOF) meeting in 2012, the JSERPT requested the department collect data on troll chum salmon fisheries from 2012-2014 and develop draft management plans for fisheries at Homeshore, West Behm Canal, Cholmondeley Sound and other fisheries that may develop. Through the 2012 BOF process, the District 12 and District 14 Enhanced Chum Salmon Troll Fisheries Management Plan was adopted and is set to sunset on December 31, 2014. A handout was distributed before the meeting titled, “Troll Chum Salmon Fishery Analysis”. The department provided these data as an informational item and will continue to collect data again in 2014. This analysis includes, a listing of current chum salmon management plans, troll chum and king salmon harvest, effort and stock composition data for District 12 and 14 fisheries, since those fisheries are managed for both chum and king salmon. Wild chum salmon escapements and escapement goals are also discussed.

Joint Southeast Regional Planning Team discussion on calculations of king and coho salmon values in the allocation formula.

There has been some question about whether or not the true value of king and coho salmon is being captured in the allocation formula. The goal was to address the problem after the December meeting and have the solutions figured out before this meeting, but the issue is complex and the logistics of scheduling the meeting did not work out to accomplish that goal. A meeting is scheduled for April 9th to discuss what the perceived problems are and how they might be addressed. Attendance will include the department, hatchery representatives, and CFEC staff.

Keta River king salmon broodstock development project update.

There is interest in the Keta River king salmon stock is based on the large size of the adults and high abundance of natural zero check fish. If the broodstock is successfully developed for production hatchery releases, it would increase the overall genetic diversity of the hatchery program. In 2013, the first egg take occurred on the Keta River king salmon broodstock development project with logistical support from ADF&G and AKI. There are plans for egg takes over next two years. In 2013, gametes were extracted from 17 females and 20 males, which produced approximately 60,000 fry. The plan is to do a traditional one check rearing program at Little Port Walter and compare the success of the Keta River stock king salmon with the Unuk River stock king salmon that are currently reared at Little Port Walter. In the second and third year, the broodstock goes up to 40 pair. If a full complement of eggs is collected, a portion of those will be raised as traditional one checks



and a portion will be raised as zero checks. The success of both rearing methods will be compared to the success of the Unuk River stock king salmon.

Port Armstrong Hatchery; Possibilities for Increased Pink and Chum salmon production.

AKI would like to increase contributions to common property fisheries and possibly increase marine survivals by adding remote release sites. Originally, AKI was planning on submitting two additional PARs for review at this meeting; one for a chum salmon release at Port Lucy, and a pink salmon release in Port Malmesbury. AKI plans to submit a PAR to increase chum salmon capacity and add Port Lucy as a remote release site at the fall RPT meeting.

Ron Josephson's presentation on hatchery production

A series of graphs showing the difference between permitted capacity and actual production by year since the 1970's was presented. Overall hatchery production has been relatively stable since the early 1990's, despite having some recent increases in permitted capacity. The statewide pink salmon production has been stable but under permitted capacity since the late 1980's. Regions such as Kodiak, Cook Inlet, and Southeast have been producing pink salmon below permitted capacity in most years, while Prince William Sound has been operating at permitted capacity since the late 1990's. Statewide, chum salmon permitted capacity has had slow steady growth since the late 1990's. Chum salmon production has been generally much closer to permitted capacity levels than pink salmon production.

The Joint, Northern, and Southern Southeast RPT decided that their next concurrent meeting will be held in conjunction with Seine and Gillnet Task Force Meetings in Petersburg. Tentative scheduling for all three meetings will be the first week of December.

cc:

Lowell Fair, Regional Supervisor, Division of Commercial Fisheries (CF), Douglas
Brian Frenette, Regional Supervisor, Division of Sport Fish (SF), Douglas
Geron Bruce, Assistant Director, CF, Juneau
Forrest Bowers, Deputy Director, CF, Juneau
Eric Volk, Chief Fisheries Scientist, CF, Anchorage
Ron Josephson, Section Chief, PNP Hatcheries and Mariculture, CF, Juneau
Sam Rabung, Statewide PNP Hatchery Program Coordinator, CF, Juneau
Tom Brookover, Division Operations Manager, SF, Anchorage
Bob Clark, Fisheries Scientist, SF, Anchorage



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South Baranof Wilderness

In 1980, the United States Congress designated 319,568 acres as the South Baranof Wilderness. Located 20 miles south of Sitka on the southern half of Baranof Island, this wilderness is accessible by boat or floatplane. Embrace in the fact that it is strategically managed to continue the preservation of this undeveloped, enduring ecosystem for the enjoyment of present and future generations.



Wilderness Laws

The Wilderness Act, ANILCA, and the Tongass Land and Resource Management Plan of 2008 (TLMP) give direction to designated wilderness areas in the Tongass National Forest. The Wilderness Act, ANILCA and/or TLMP **prohibit** the following:

- ◆ Commercial enterprise (except for outfitters and guides)
- ◆ Permanent and temporary roads
- ◆ Use of motor vehicles and motorized equipment (except snowmobiles, motorboats, and fixed wing airplanes)
- ◆ Mechanized form of transport (i.e. bicycles, wheelbarrows)
- ◆ Damaging of live trees
- ◆ Construction of structures and installations
- ◆ Landing of helicopters

Under ANILCA and TLMP temporary structures are allowed but are limited to a 14-day stay at any one location. TLMP also mandates a group size limit of no more than 12 persons for commercial **or** general public use within this wilderness. These regulations are established for the wilderness character to remain undeveloped, and natural for future use.

Facilities

There are three public recreation cabins that are accessible by foot or floatplane, and one primitive hiking trail in South Baranof Wilderness.

Wilderness Character

Fiords, glaciated u-shaped valleys, cascading waterfalls, and numerous active glaciers might exhibit the feeling of Norway, but in fact it describes the South Baranof Island Wilderness. Starting within 2 miles of the beach the landscape exponentially rises to glacier covered peaks at 4,000 feet. Peaks, though, are not the only things to feast your eyes on. Breathtaking waterfalls exiting hanging valley lakes spill into steep bowl-shaped cirques at the end of highway long fiords. It might seem like paradise within this wilderness area but remember outside the bays and fiords 100 miles winds come screaming from the open Pacific Ocean. Thus South Baranof Island Wilderness is a perfect safe haven for boats, and for the human spirit.





Wilderness Challenges

People are lured into Alaska for its beauty and excitement but remember it is also very unforgiving. South Baranof Wilderness is within a temperate rainforest where the average annual rainfall is over 200 inches and temperatures range from 25 -65°F. Be prepared with the appropriate clothing, safety equipment, shelter supplies, and water purifying devices for a cool and frequently overcast climate. This wilderness also contains brown bears so store food and trash properly. During the summer months, be especially careful around salmon spawning streams. If traveling by boat, caution should be taken on the open ocean where winds could exceed 100 mph.

Leave No Trace

Tongass National Forest is the largest, intact coastal rainforest in America. The South Baranof Wilderness is a piece of this treasure and is set aside for all visitors – now and in the future. To insure that this area is left unimpaired for future use, practice the following Leave No Trace principles.

- ◆ Plan ahead and be prepared for extreme weather conditions, and emergencies.
- ◆ Travel and camp on durable surfaces. South Baranof is managed as a pristine area. Disperse use to prevent the creation of campsites and trails and avoid places where impacts are just beginning.
- ◆ Dispose of waste properly. **Pack out** all trash, leftover food, and toilet paper. Use bathroom facilities when available. At appropriate conditions dispose of human waste in the intertidal zone. If camping in upland forests dispose of solid waste by digging a cathole 6 to 8 inches deep located at least 200 feet from water or campsite.
- ◆ Leave what you find. Examine but do not touch cultural or historical structures and artifacts. Do not build structures or furniture with live trees.
- ◆ Minimize campfire impacts. Use a lightweight stove when possible. When a campfire is necessary, keep fires small. Build a fire below mean high tide, or when in a forested area, build a mound fire or use a fire pan to avoid damaging the ground vegetation. Stay away from boulders or tree bases to avoid long lasting black scars.
- ◆ Respect wildlife and other visitors in the surrounding area.

This flyer was printed with the help of recreation fee money. USDA is an equal opportunity provider and employer.

Threats and Benefits

While designated wilderness areas have the most protections of any other public lands, there are still threats that degrade the wilderness resource. Unauthorized trespass structures, trash pollution from visitors, conflicts between user groups, loss of solitude, and resource damage of flora when constructing illegal trails are the major human problems to this wilderness. Building awareness and a better understanding of designated wilderness areas is the key foundation to ensure that these areas stay wild.

Along with providing excellent recreational opportunities, designated wilderness areas protect natural ecosystems from being manipulated or developed. They provide us with clean air and clean water, and allow the natural processes to continue without the permanent presence of humans. As the current laws continue to give management direction, no wilderness on the Tongass will have a commercial timber harvest or construction of permanent roads. Due to the action of Congress in 1980, South Baranof Wilderness will remain protected for future generations.



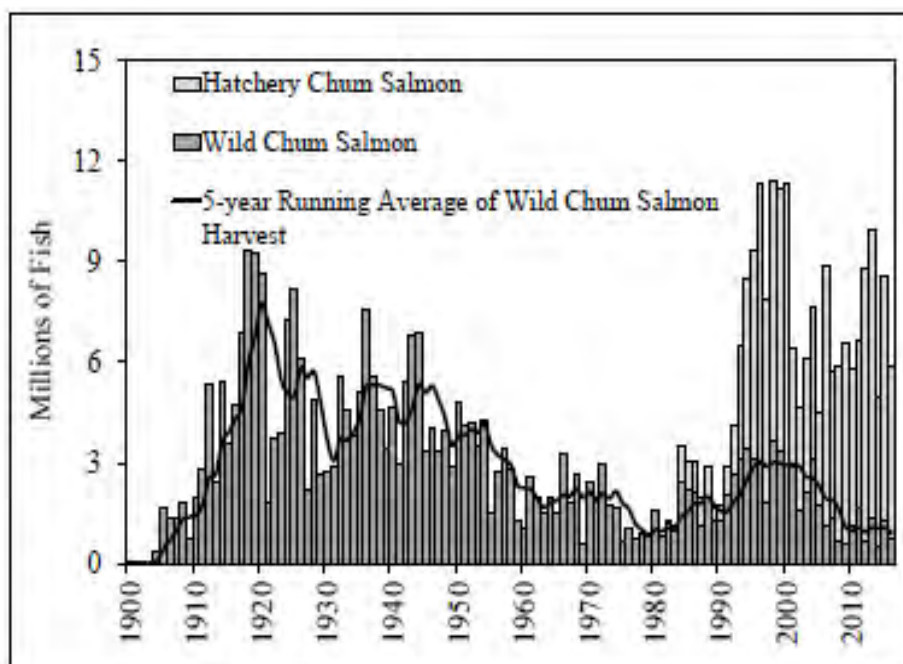
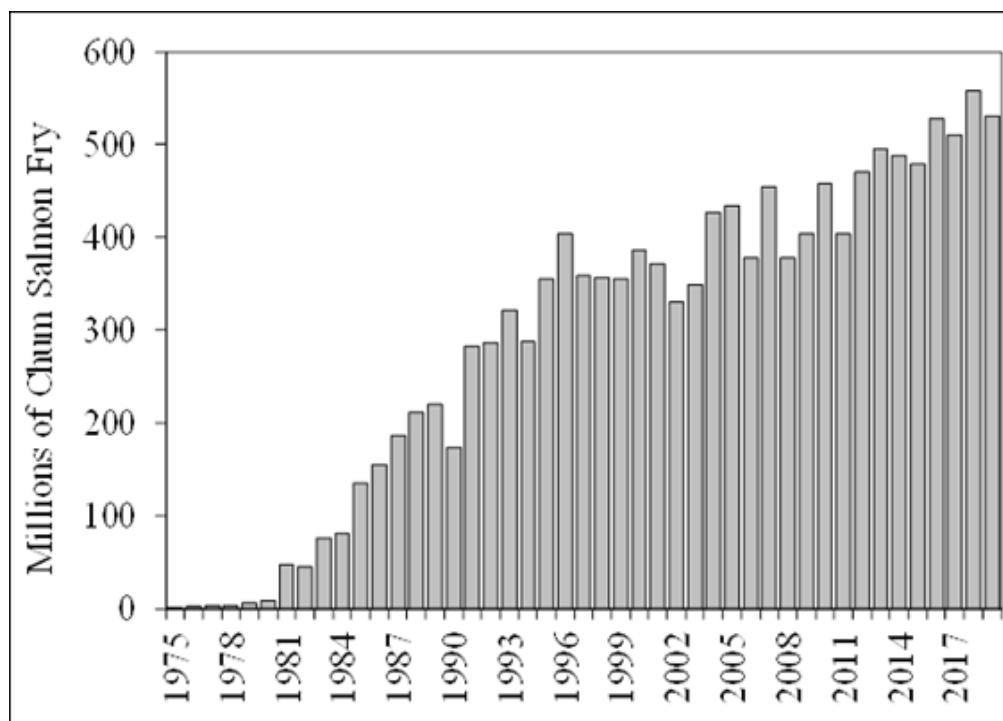


Figure 1.—Annual common property¹ harvest of chum salmon in Southeast Alaska from 1900 to 2016 showing estimated harvests of both hatchery-produced and wild chum salmon. (Data prior to 1960 are from Byerly et al. 1999).

The Alaska Department of Fish and Game (ADF&G) developed a standardized program to estimate an annual index of spawning chum salmon abundance based primarily on aerial surveys (Heinl et al. 2004; Heinl 2005; Eggers and Heinl 2008). The trends in these indices provide a meaningful indicator of trends in the relative abundance of spawning chum salmon in Southeast Alaska. These indices also formed the basis of the first escapement goals for chum salmon in Southeast Alaska, which were established in 2009 (Eggers and Heinl 2008) with some modified in 2012 and 2015 (Piston and Heinl 2011, 2014). Lower-bound sustainable escapement goals were developed for three broad regional aggregates of streams for summer-run chum salmon stocks, and sustainable escapement goal ranges were established for five additional fall-run chum salmon stocks.

In 2000 and 2001, the Alaska Board of Fisheries adopted the *Policy for the Management of Sustainable Salmon Fisheries* (5 AAC 39.222) and the *Policy for Statewide Salmon Escapement Goals* (5 AAC 39.223) into state regulation to ensure that the state's salmon stocks would be conserved, managed, and developed using the sustained yield principle. These policies require ADF&G to report on salmon stock status and escapement goals to the board on a regular basis, document and review existing salmon escapement goals, establish goals for stocks for which escapement can be reliably measured, and prepare scientific analyses with supporting data when goals are created or modified. In order to meet requirements of these policies, Heinl et al. (2004) and Heinl (2005) produced ADF&G's first reports on stock status of chum salmon in Southeast Alaska. They did not identify any chum salmon stocks in Southeast Alaska for which existing

¹ Note: Past reports in this series included private hatchery cost-recovery harvests in Figure 1.



SEAK HATCHERY RELEASE INCREASES 1976-2019

RE: ACR 2 Modify hatchery operations in Crawfish Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish (5 AAC XX.XXX)

ACR 2 OPPOSE: This proposal fails to meet the criteria for an ACR for the following reasons: It does not cite a regulation that will be changed, rather it seeks to change “New and many AAC 40 need an upgrade as they are over 40 years old, they did not anticipate the magnitude of hatchery releases so do not ask biological questions needed.” It is nearly impossible to determine what is being proposed, but it is clear that some of the regulations under AAC 40 are the target, but exactly which one(s) are not clear. We have seen regulatory changes proposed simply because regulations are “old” before, and this has never been determined to be an adequate justification for a regulatory or statutory change. Rather, changes should be made based on their merit. Further, regulations do not ask questions, biological or otherwise. The proposer also chooses to ignore the requirement to state whether this proposal is allocative (it is), and if so, no new information is provided that would compel the board to consider the proposal outside of cycle. The long and incongruous justification provided do not amount to an impact, as is indicated in ACR 2. Rather, the well-known possibility of impacts is referenced. The Native Village of Eyak supports hatchery enhancement of wild salmon runs in Alaska for the many benefits they provide our state, and the world. We support the use of best management practices and support the Alaska Hatchery-Wild Research Program (AHRP) that has been ongoing for several years, and represents an enormous investment by the State to objectively determine the extent of hatchery straying and impact on wild stocks, so that hatchery regulations can be improved using this information. We have recently endured several ACRs and Emergency petitions causing great disruption to the process that the Board of Fish provides, and at the last discussion of these issues, the overwhelming consensus was that we should address hatchery issues IN-CYCLE. ACR 2 does not provide any justification for an impact, does not address the required criteria for an ACR, and so should be rejected, and any issue revisited in-cycle.



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October 7, 2019

Board of Fisheries

Opposition to ACR #2 Hilstrand Crawfish Inlet

Dear Chairman Morisky and Board of Fish Members:

Northern Southeast Regional Aquaculture Association (NSRAA) represents some 2,000 limited entry salmon permit holders in Southeast Alaska, consisting of a twenty-five member elected board of directors representing commercial fishermen, sports, subsistence, conservation, municipality, Native organization and other interests, and provides benefits to all types of fisheries economically as well as priceless experiential opportunities.

NSRAA opposes ACR #2 for lack of merit and failing to meet the threshold criteria for an ACR: 1) conservation purpose, 2) correct an error in regulation, and/or 3) correct an effect in a fishery that was unforeseen. The applicant acknowledges that the project went through the legal regulatory process, but does not like the outcome. Each criteria will be taken point by point.

First, some general comments. The State of Alaska set up a rigorous and open public process to apply for (sometimes denied) PNP hatchery permits, and select local broodstock source & eggs (BOF authority 16.10440(b)), within a framework to minimize impacts to wild stocks; all of which is well documented in the PNP statutes and regulations. At the inception of the program, disease was a grave concern as it should be, but as past science-based papers and public comment submissions to the BOF by the State Fish Pathologist demonstrate, common wild stock salmon diseases (i.e., BKD, IHNV) have not increased beyond background levels of the early 1970s. Medvejie Hatchery from which the Crawfish chum salmon originate has a clean bacterial and virology report in 2019 (see report page 6 below). Many hatchery proposals and release sites have been denied by ADF&G. For example, prior to Crawfish Inlet being permitted NSRAA went through a rigorous process with ADF&G Sportfish and Commercial Fish Divisions to identify a location where wildstock interactions were minimal. As in many fisheries, temporal segregation of stocks is one facet of minimizing interactions. For example, the summer run chum 'index stream' in West Crawfish is temporally segregated from the later run timing Medvejie fall stock. Finally, the PNP associations initiated the Hatchery-Wild Interactions research to better understand effects of straying. This long-term research began in 2012 and is expected to be completed until 2023.

It is unfortunate that the proponent uses a shotgun approach in the ACR, hoping something registers a hit. In order to be thorough this comment letter will address each of the issues sequentially as they appear in ACR#2.

ACR criteria

- a) For a fishery conservation purpose or reason

The proponent states that the population is being homogenized whereas there is actual temporal



separation in the two stocks. The West Crawfish wild stock has a summer run timing while the Medvejie stock is a fall run with a spawn timing in late August to late September. Stocks adapted to streams with relatively low water temperatures (summer run) require a longer duration of incubation to obtain the same cumulative temperature to hatch out in the spring when peak secondary productivity (zooplankton) ramps up. A fall chum stock like Medvejie is adapted to relatively warmer freshwater temperatures and therefore spawn later which also optimizes emigration to the ocean during the high spring productivity window. For example otolith data taken throughout the fishery show 0.51% No Mark (wild salmon) caught during the conduct of the fishery (see page 7).

Salmon do stray whether hatchery raised or wild and that is why the PNP program, State of Alaska, and fishing industry have initiated the HWI research program. The high percentage of Crawfish strays in the chum salmon index stream is an artifact of spawn timing and fishery management. Summer run chum spawn late early August to late-August, while fall chum spawn late-August to end of September. Therefore, if sampling occurs in late-August to early September there will be few if any summer run chum and high proportions (not necessarily high absolute numbers) of fall run chum salmon. For example, a sample of 20 chum in late August with 19 of them fall stock would be a 95% strays.

Regarding stray proportions, the Withler reference noted by the proponent is based on coho and steelhead in the Columbia River basin. Both species are freshwater smolt species and have little relevance to chum salmon stray proportions and effects. Coho are known to have high fidelity to their natal stream but their life histories are fundamentally different from chum salmon. NSRAA has conducted coho straying work on Salmon Lake near Sitka and hatchery coho have demonstrated less than one percent stray proportions in Salmon Lake, a wild stock system from which the hatchery coho program was developed. The management plan guideline has a maximum threshold stray proportion of 5% but has never surpassed 1%. The salient point here is that context and species matter and using a citation from the unique circumstances of Columbia River hatchery fish intermingling with wild steelhead and coho smolt species and applying it to large meta-populations of Alaska wild chum salmon is imprudent.

An especially erroneous aspersion is the mention of fish disease. Fish pathology is a serious issue that was carefully addressed in the development of the enhancement program. Policies and procedures were put in place specific to each species and those protocols have been followed for four decades. The State of Alaska has two fish pathology labs, one in Juneau and one in Anchorage. Many bacteria and viruses occur in the natural environment, and salmon have evolved to survive them except in rare circumstances. Enhanced salmon coming from the same stocks, are susceptible to the same bacteria and viruses, but wild fish have not seen an increase in disease or mortality since the inception of the hatchery program. Straying of hatchery fish has never been shown to introduce disease into wild salmon. The board may want to hear from the State's fish pathologist (Dr. T. Meyers) on this topic.

Adult salmon entering the terminal areas or natal streams "impact of daily rations of 4% consumed by these strays when they mill around..." It is well known that salmon cease to eat when they near the terminal area to spawn. Salmon put their energy reserves into gonad development, final migration to spawn location, and mate selection, not pursuing prey. That is the evolutionary strategy of Pacific Salmon, while Atlantic salmon and Steelhead took a



divergent path, spawning multiple years. It would make little evolutionary sense to spend energy eating when they will die soon after spawning. Ray Troll captures this on his infamous T-shirt “spawn til you die”. In fact, salmon begin consuming their own muscles and proteins in their final weeks of life. Consuming their bodies is why salmon meat color goes from pink/red to pale as they near their natal stream or release location. There are some exceptions to this in the smolt species coho, sockeye, and chinook stocks that have long freshwater migrations before reaching their natal spawning grounds.

b) To correct an error in regulation

What the proponent has stated in this section cites no error. They may not like the way RPTs function, but they were established in regulation as a recommendation body to the commissioner of ADF&G. The proponent has stated incorrect or outright false statements about RPTs being secret, or closed door or not allowing public comment, when the record has shown quite the opposite. The proponent appears to want to change regulations outside the scope of BOF authority. The statement of error is illogical.

The requested language change in this section is fairly close to how RPT’s function. The section the proponent has cited “SE Alaska Enhanced Allocation” is a specific section adopted by the BOF in 1994 (**5AAC 33.364**) to address how enhanced salmon will be shared among troll, seine, and gillnet gear, and ways to deal with imbalances after evaluating 5-year rolling averages of harvest. This section has no relevance to the proponent’s statements regarding an error in regulation. The suggested language is already addressed in Permit Alteration Requests (PAR) when a new proposal is vetted through the department sections regarding genetics, pathology, management, transport, significant stocks, etc.

c) To correct an effect on a fishery that was unforeseen when the regulation was adopted

The best way to refute the proponent’s contention is to take it sentence by sentence, point by point.

- “....new compelling information of effects of high proportions of straying....” The Hatchery Wild Investigation research being referred to here is ongoing with preliminary results for two pink salmon streams in PWS (final analysis 2020), but no results regarding chum salmon in SE Alaska (likely in early 2023 due to 5-year lifecycle). Even with regard to pink salmon in PWS, there is no report on the effects of straying, but rather initial findings on reproductive success that are inconclusive because the research is not complete. Second, high stray proportions in regards to the Crawfish Inlet index stream is not representative sampling. The index stream is a summer run chum system and the Crawfish Inlet enhancement program in fall run. The sampling that was conducted in late-August and later is the timing of fall run chum, and therefore sampling of chum during this period would expect to show a very high proportion of fall run since the summer run chum are mostly spawned out, eaten, or washed out of the stream. Vetting for this project took approximately three years to permit and was chosen specifically due to absence of fall run stocks nearby, different run timing, and ability to manage the small wild pink salmon return that occurs in West Crawfish and the larger pink salmon return to Whale Bay fifteen miles to the south.
- 1) ACR #2 proponent: “loss of productivity means loss of opportunity....” Loss of productivity is speculative and highly unlikely. The department is managing this fishery aggressively to minimize straying. Crawfish is a new project and the returns are larger



than expected and returning through a different corridor than expected, but the local AMB has used his authority to harvest aggressively while closing areas and implementing no fishing zones to protect wildstocks. Adaptive management is very much in place here. Based on the 2019 season experience, the management plan for Crawfish will be modified for 2020 to further minimize straying.

2) ACR #2 proponent: “majority of fishermen in Alaska....” All commercial and sport charter fishermen in Southeast Alaska target and harvest enhanced salmon. Fishermen consider the enhancement program as supplementing their wild salmon harvest. Other than Bristol Bay, most salmon fishermen from Ketchikan to Kodiak and Cook Inlet harvest some proportion of enhanced fish. In fact, Nome has a small enhancement project, a Yukon group is considering enhancement, as is the community of Yakutat.

3) ACR #2 proponent: “Fishermen do not want to damage their own fisheries...” True, this is why PNP boards get updates on the HWI research at each board meeting. It is also why the PNP boards consisting of fishermen, conservation, sport fish seats, etc. have put millions of dollars into the research program. Fishermen are conservation minded, they know if they don’t have healthy wildstocks, and fisheries are not managed for escapement, there will be no future. Sustainability is sacrosanct to Alaska fishermen because it is not only their future, but their children’s, conservation is fishermen’s legacy to their children and grandchildren who will be the next generation of Alaska fishermen.

4) ACR #2 proponent: “The decision to allow this remote release has serious consequences that unforeseen or ignored....” This is simply untrue and the records of RPT meetings, PARs, FTPs, genetic review, fish pathology review, management review will show the consideration given to the project before it ever became a reality.

5) ACR #2 proponent: “....needs correction....” Management modifications have and are being made. The department is the appropriate authority to suggest or modify the management plan for Crawfish Inlet, not the BOF. ADF&G made modifications to the management plan subsequent to the 2018 season, and will do so again for 2020.

6) ACR #2 proponent: “Homogenization of wild fisheries with hatchery stocks....” Hatchery stocks are selected from local wildstocks. Releases and returns are managed to segregate harvest by time and area. Different harvest rates are used on wild salmon versus hatchery returns. PWS is a good example of both hatchery stocks and wild stock coexisting and showing increases in productivity in synchrony. Generally, when conditions in the ocean are good for wildstock salmon, conditions are good for enhanced releases. The ocean doesn’t discriminate hatchery smolt from wild smolt, high ocean productivity years are good for all salmon and salmon fishermen.

7) ACR #2 proponent: “scientists generally agree.....hatchery stock into wildstock could result in decrease productivity....” There is not general agreement on this point and the accompanying graph demonstrates that for the past 30 years both wildstock salmon and enhanced salmon have increased in productivity in a major way.

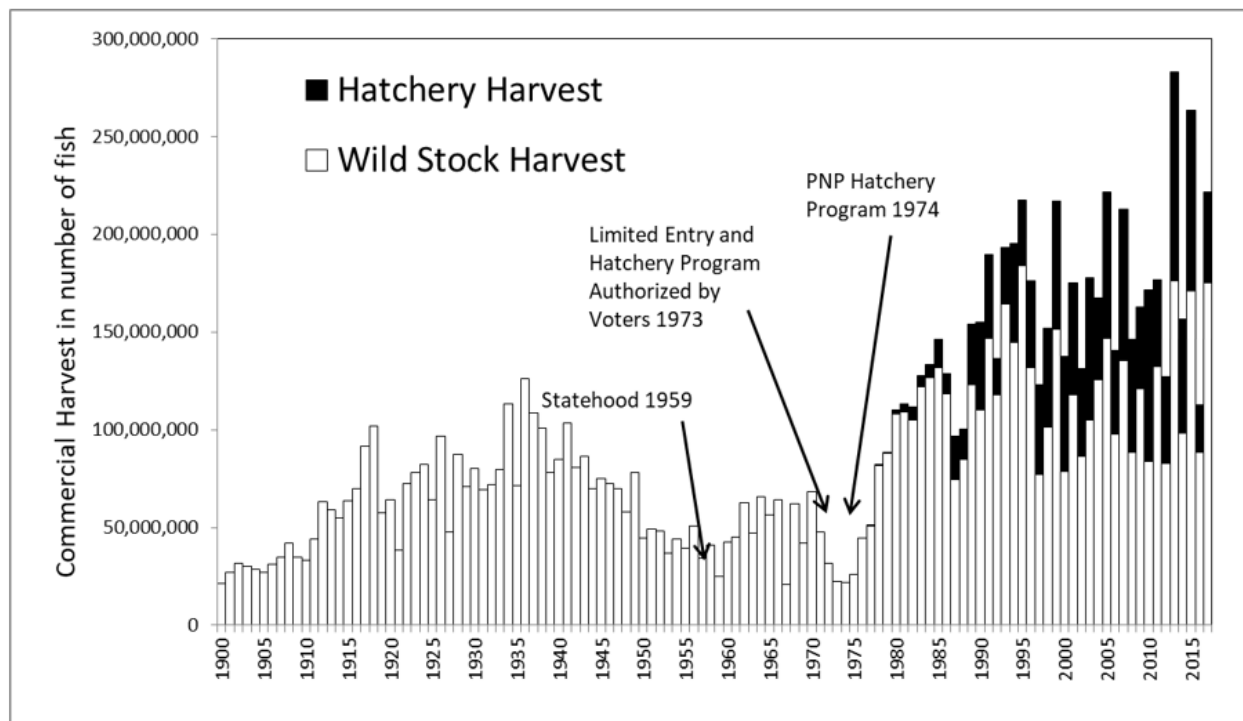


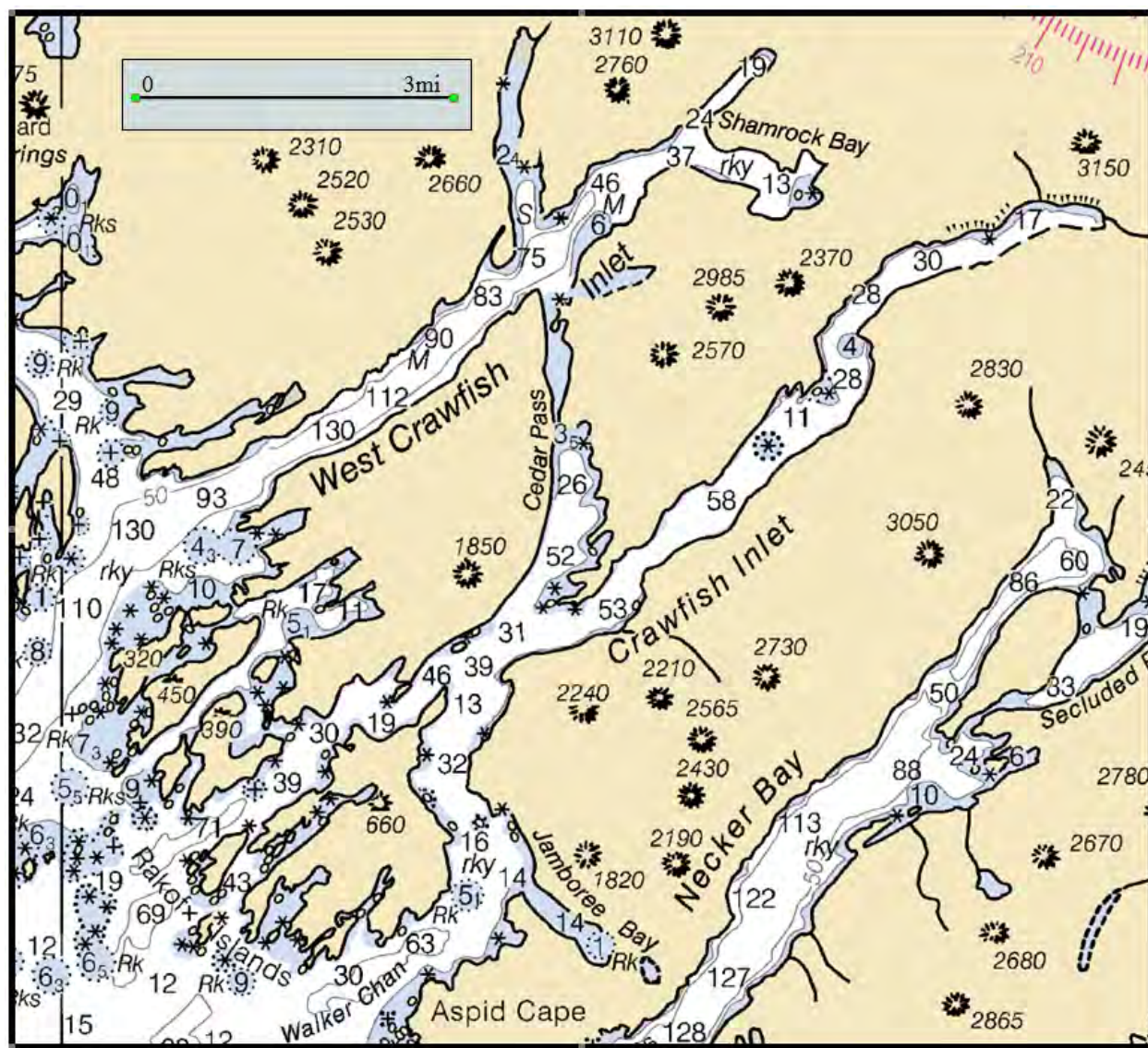
Figure 1. Commercial salmon harvest in Alaska, 1900-2017. (Stopha 2018)

In conclusion, ACR #2 does not meet any of the three criteria set forth by the BOF and therefore should not be adopted as a proposal. As was determined at the March 2019 statewide meeting, proposals of this sort should be submitted during the normal cycle, in this case S.E. Fin-fish - January 2021.

Thank you for your attention to this matter.

Respectfully,

Steve Reifentuhl
General Manager, Northern Southeast Regional Aquaculture Assoc.



Crawfish Inlet Otolith Data Weeks 32 to 37, all sampling conducted during Troll, Seine, and Cost Recovery Fisheries, 2019. Out of 1,1821 otoliths examined only 6 were ‘no mark.’

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ACCESSION NO: 19-0512

ALASKA DEPARTMENT OF FISH AND GAME
JUNEAU FISH PATHOLOGY LABORATORY, CF DIVISION
3333 Old Glacier Highway - PO Box 115526, Juneau, AK 99811-5526
Phone: (907) 465-3577
ted.meyers@alaska.gov

REPORT OF LABORATORY EXAMINATION

LOT (YEAR, STOCK, SPECIES): Medvejie chum salmon *Oncorhynchus keta*

FACILITY: Medvejie Hatchery

CONTACT PERSON/ADDRESS: Adam Olson, Mgr., NSRAA, 1308 Sawmill Ck. Road, Sitka, AK 99835

SAMPLE DATE: 9/10, 9/17/18

DATE SAMPLE RECEIVED: 9/12, 9/18/18

SPECIMEN TYPE: Kidney tissues, Ovarian fluids

LIFE STAGE: Adult female

STATE: Frozen/Refrigerated

NUMBER IN SAMPLE: 60 each WILD: Rack returns

HISTORY/SIGNS: N/A

REASON FOR SUBMISSION: Update disease history

FINAL REPORT DATE: 3/18/19

CLINICAL FINDINGS: ELISA female #s 1-60 = 60

ELISA: 0/60 samples positive for *Renibacterium salmoninarum* (Rs). Mean optical density values ≥ 0.085 were considered positive for the Rs antigen.

VIROLOGY: 0/60 (12 X 5 fish pools) positive for virus by quantal assay on EPC and CHSE-214 cells @ 14.3° C for 14 days with a blind-passage for another 14 days. Detection limits were 10 infectious particles/ml pooled sample. PEG used for enhanced sensitivity.

FAT: 0/60 positive for *Aeromonas salmonicida*
0/60 positive for *Yersinia ruckeri* Types I and II

COMMENTS/RECOMMENDATIONS:

No viral CPE or targeted bacterial pathogens were detected in the samples submitted. The disease history for this stock has been updated for the next 4 years.

This laboratory report was emailed to NSRAA staff on 3/18/19.

FISH HEALTH INVESTIGATOR(s): T.R. Meyers

TECHNICAL ASSISTANCE: R. Morris

COPIES TO: FY19, T. Meyers



Alaska Fisheries Development Foundation, Inc.

Julie Decker, Executive Director
Alaska Fisheries Development Foundation
www.afdf.org



PACIFIC SEAFOOD PROCESSORS ASSOCIATION
Est. 1914

Christopher Barrows, President
Pacific Seafood Processors Association
www.pspafish.net

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Submitted VIA: Alaska Board of Fisheries Comment Website

RE: Oppose ACR #2

October 8, 2019

Dear Chairman Morisky and Board of Fisheries Members,

AFDF and PSPA are writing this joint letter in opposition to the agenda change request #2 related to the Crawfish Inlet hatchery release in order to offer our unique perspectives as the Client and previous Client for the two seafood sustainability certifications held by the Alaska salmon fishery. PSPA is the previous Client for the Marine Stewardship Council (MSC) certification. AFDF is the Client for the Responsible Fisheries Management (RFM) certification and now the new Client for the MSC certification.

ACR #2 fails to meet any of the three criteria required for an agenda change request and should not be allowed to move forward as an out of cycle proposal. The State of Alaska has a rigorous and open public process to determine whether a PNP hatchery permit is warranted under the authority of the ADF&G Commissioner. In addition, protection of wild stocks is paramount to the integrity of the enhancement program. Safeguards are built into the regulations such as requiring use of nearby salmon broodstock and sliding scales for wild salmon eggs to ensure biological escapements are met during the development of the hatchery's first generation. The regulatory framework is structured to minimize impacts to wild stocks with strict protocols to protect fish health (fish pathology and transport policies), genetic integrity by using local stocks, locating enhancement programs spatially and temporally distant from significant wild stocks, and aggressive harvest management on enhanced salmon returns once they are segregated from wild stocks.

- 1) ACR#2 does not establish a fishery conservation concern.** The local streams in Crawfish Inlet are meeting their pink, chum, and coho escapement goals. The West Crawfish wild stock has a summer run timing while the Medvejie stock is a fall run with a spawn timing in late August to late September. ADF&G recommended this site, because of temporal separation according to their escapement survey data. Concerns regarding the impact of adult enhanced salmon eating prey the wildstocks would otherwise eat have been raised. However, it is well known that salmon cease to eat when they near the terminal area to spawn. Salmon put their energy reserves into gonad development, final migration to spawn location, and mate selection, not chasing prey.
- 2) ACR #2 fails to correct an error in regulation.** What the proponent has stated in this section cites no error. The proponent may not like the function of the RPTs, however, they were established in regulation as a body that makes informed recommendations to the Commissioner of ADF&G. The



proponent has stated incorrect or outright false statements about RPTs being secret, or closed door or not allowing public comment. RPT public records demonstrate quite the opposite. The proponent appears to want to change regulations outside the scope of BOF authority. There is no error.

- 3) ***ACR #2 fails to correct an effect in a fishery that was unforeseen.*** All concerns articulated by the author have been a considered by ADF&G since the inception of the hatchery program. These concerns are the basis for hatchery permitting to ensure the sustainability of our natural fish stocks. Disease, genetics, and ecosystem impacts are given strong consideration in the decision process for site and stock selection. Both in the beginning and now, the presence of hatchery fish in area streams, and potential for genetic introgression between hatchery fish and wild is neither unexpected, nor unforeseen. For this reason, this ACR fails the third criteria required for its consideration by the board.

In closing, ACR #2 has failed to meet any of the three agenda change request criteria and should not be considered out of cycle. Thank you for your consideration of our perspective while making your determination.

Sincerely,

Julie Decker, Executive Director, AFDF

Christopher Barrows, President, PSPA



Prince William Sound
Aquaculture Corporation
DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD



PC021
1 of 2

October 3rd, 2019

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

via email: dfg.bof.comments@alaska.gov

RE: Work Session October 23-24, 2019 (ACR #2 and Non-Regulatory Proposals)

Chairman Morisky, Members of the Alaska Board of Fisheries:

The Prince William Sound Aquaculture Corporation, (PWSAC) opposes ACR #2 as the ACR does not meet the criteria established for an ACR.

We oppose this ACR as the author does not provide factual or substantive support to justify the request. The requester does not take all available information into consideration. Further, it ignores the multiyear regulatory process that was followed in accordance with established regulations when Northern Southeast Regional Aquaculture Association (NSRAA) worked closely with the Alaska Department of Fish and Game to permit this remote location and subsequent fishery.

All Alaska hatchery operators are permitted under Alaska Statute AS 16.10.400, which establishes a rigorous and public permitting process. Further, all activities of a hatchery must fall within the Regional Salmon Plans which fall under AS 16.10.137. In all, there are 23 statutes and 72 regulations guiding the program, ensuring that all activities are well vetted by various stakeholders and agencies.

The remote hatchery release at Crawfish Inlet has provided significant economic opportunity to the regions fishermen and has been a benefit to all that have participated in its development. It is vital to Alaska's economy that the Alaska salmon enhancement program is carried out in accordance to the regulations established by the Alaska Legislature and the policies established by the Alaska Department of Fish and Game without political interference by a select few non stakeholders who attempt to discredit the program with misleading information.

PWSAC also would like to comment on non-regulatory proposals EF-F19-095, EF-F19-097, EF-F19-126, EF-F19-128 & EF-F19-129. These proposals are a continuation of non-fact based requests asking the Board of Fisheries (BOF) to take

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

P.O. Box 1110 · Cordova, Alaska 99574
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action that should be addressed by the Alaska Department of Fish and Game. These requests should not be taken up by the BOF, as they all can be addressed through the appropriate channels. These are once again an attempt by a select few to undermine a program that has a 40-year history in the state providing significant economic value.

PWSAC would like to thank you for your time, and consideration of these comments.

Sincerely

Casey Campbell
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

P.O. Box 1110 · Cordova, Alaska 99574
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Southeast Alaska Fishermen's



PC022
1 of 3

1008 Fish Creek Rd

Juneau, AK 99801

Email: seafa@gci.net

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-523-1168

Website: <http://www.seafa.org>

October 7, 2019

Board of Fisheries

Mr. Reed Morisky, Chairman

P.O. Box 115526

Juneau, AK 99811-5526

RE: ACR 2 MODIFYING HATCHERY OPERATIONS IN CRAWFISH - **OPPOSE**

Dear Chairman Morisky and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is opposed to ACR 2. ACR 2 is outside of the purview of the Board of Fish. In addition, this ACR proposal does not meet any of the three criteria for acceptance of an ACR such as a 1.) conservation concern, 2.) correct an error in regulation, 3.) correct an effect in a fishery that was unforeseen. The Crawfish chum hatchery release has gone through the ADF&G and Regional Planning Team (RPT) review, which is part of the hatchery permitting system and includes a robust public process.

At the 2014 RPT meeting, it was unanimously recommended to the Commissioner that the Crawfish remote release and the permit for the eggs for the program be approved. At this meeting, there were the 3 ADF&G Dept RPT members, 3 fishermen from Northern Southeast Regional Aquaculture Association (NSRAA) and 3 fishermen from Southern Southeast Regional Aquaculture Association (SSRAA) with one fisherman being from each gear group: seine, gillnet & troll. Also sitting on the RPT in non-voting seats was the Regional Coordinator who was elected as Chair, a United States Forest Service Representative, a Non-Regional Hatchery representative and a Commerce Dept Representative. In attendance in the audience there were 7 other ADF&G employees and 21 members of the public present, including hatchery representatives, commercial fishermen, processors, and association representatives. Only the six voting representatives on the Northern RPT voted on the PAR for the Crawfish project (3 fishermen & 3 ADF&G members). There was written public comment from the Sitka Tribe of Alaska opposing the project which was brought forward as part of the discussion and in the record sent to the Commissioner. The original PAR request was for 50 million chum, ADF&G



preferred a 20 million project for evaluation. After much discussion and breaks for the Dept to discuss with genetic staff and amongst themselves, the RPT agreed to a 30 million project with several caveats to protect and evaluate effects on West Crawfish including: 1) NSRAA commits to sampling the West Crawfish Inlet index stream, if it is not already being sampled in the current straying study; 2) the terminal harvest will be sampled for wild stock interception; 3) NSRAA will be required to clean up the special harvest area if there is a buildup of returning hatchery chum salmon. NSRAA staff suggested a management plan that puts a net fishery behind the troll fishery at least once a week to minimize straying concerns and evaluate the efficiency of the troll fishery. As appropriate, ADF&G made some modifications to the program through the 2019 annual management plan based on results from the 2018 season, and will review again before approving the 2020 annual management plan.

ACR 2 states that no action was taken at the April 2019 RPT meeting and seven new additional Permit Alteration Requests (PARs) were introduced and one PAR for additional chum at Crawfish was denied. I attended that meeting and the Crawfish permit was not denied it was withdrawn by the proposer. The majority of the other PARs recommended in April of 2019 for approval by the Commissioner were Chinook and coho projects that were mitigation projects for the loss of Chinook salmon under the Pacific Salmon Treaty agreement.

The Proponent for ACR 2 mistakenly states that the decisions are made by the RPT but the RPT only makes recommendations to the Commissioner of ADF&G who makes the actual final decision. ADF&G will deny a project or site before it gets to the permitting process if they have biological concerns as shown by the proposed projects that were considered before settling on Crawfish as a release site. If ADF&G has concerns, they can also modify a project through the annual management plan.

ACR2 mentions 5AAC 40.345 the Southeastern Alaska Area Enhanced Salmon Allocation Plan as containing an error in regulation to be corrected. 5AAC 40.345 is a Board of Fish regulation adopted in 1994 after a long public process that was a consensus among the gear groups. This is strictly an allocation regulation, and as such, is not appropriate for an Agenda Change Request. In addition, the statement taken from the allocation plan to make annual recommendations to the Commissioner on production changes to salmon enhancement projects in reality amounts to the Northern and Southern RPT's considering the allocation effects of a project as they consider their recommendation. The Joint RPT once a year reviews the current status of the plan and updates the Commissioner as well as commenting on Board of Fish proposals that may affect the status of the allocation plan. **The joint RPT does not have any authority to approve any changes, they can only make comments and recommendations.**

ADF&G in RC2 Staff comments do not see the issues raised in this ACR2 as a conservation concern that needs to be addressed through the Board of Fish process. There is temporal



separation from the West Crawfish summer chum return and the Crawfish fall hatchery return. This proposal does not merit acceptance as an agenda change request as changing hatchery production in Southeast Alaska is very allocative. The Crawfish program has a troll priority followed by harvest by the seine fleet to keep the area cleaned up to prevent excessive straying and both these gear groups are currently out of their 5-year rolling average allocation range.

SEAFA is a non-profit commercial fishing association representing our 330+ members involved in the salmon, crab and, shrimp fisheries of Southeast Alaska and longline fisheries in Southeast Alaska and the Gulf of Alaska.

Sincerely,

Kathy Hansen
Executive Director



P.O. Box 714
Ward Cove, AK 99928
(907) 220-7630
info@seiners.net www.seiners.net

Board of Fisheries

Opposition to ACR #2 Hillstrand Crawfish Inlet

Dear Chairman Morisky and Board of Fish Members:

Southeast Alaska Seiners Association (SEAS), appreciates the opportunity to comment in opposition of ACR #2. First and foremost, this ACR fails to meet the threshold criteria for an ACR, period. That alone should be the end of story. The author chooses to exaggerate, embellish data with conjecture, and simply misrepresent the facts. Almost every statement made either misrepresents facts, uses other research and applies it where not applicable, or interjects personal opinion as relevant to her lack of appreciation or understanding of statutory and/or regulatory language. I will only site three examples.

- (1) West Crawfish NE Arm 113-32-005 is one of nine index streams in district 113 that make up the Northern Southeast Outside subdistrict for chum salmon. To say that it is the second largest index stream is an exaggerated statement at the least. There are four systems in those nine that have median escapement numbers from 1982-2016 (prior to any hatchery returns) of between 13% and 20% each of the total median escapement for that subdistrict. They combine in these years to represent 62% of the total median escapement. While every index stream is important, the authors' inaccurate claim is meant to evoke a response of immediate impending doom, which is an overstatement of reality.
- (2) Twice the author refers to a sample of 100% straying that simply does not exist in any data set, and neglects to qualify the sample size in the two samples that were from West Crawfish. The 8/27/18 sample was 92 fish, the 9/28/18 sample was 87 fish, and the 100% sample the author refers to was a 2 FISH sample taken from 113-41-1090 Indian River; the otoliths recovered were from a Sheldon Jackson release, not a Crawfish release. In 2019, NSRAA and the local Area Management Biologist took measures to remove these fish in a timelier fashion to minimize the straying potential. Otolith samples of the troll and seine fishery in West Crawfish and Crawfish Inlet are still preliminary and incomplete, but initial indications are that there is very little wild stock in these area as early as 8/4/19. The authority currently exists to more aggressively remove fish from this area to minimize strays to the natural system.



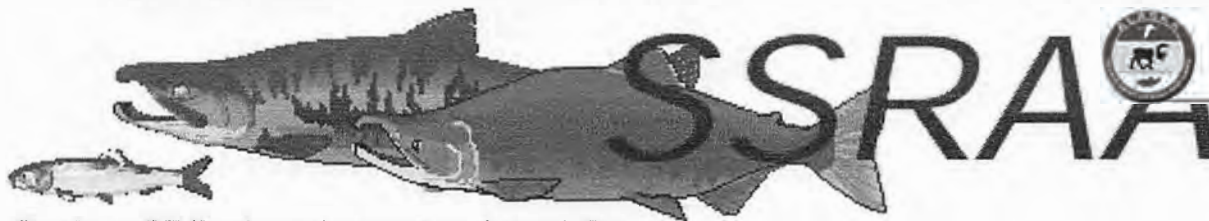
- (3) They authors' rebuke of the RPT, its structure, process, and past decisions are the most disappointing and provoking statements in my opinion. I have personally participated in the process in Southeast for more than 35 years; and the assertions are just untrue and an insult to every member whether a Department representative or a Regional Association representative. It's unfortunate the author does not agree with the decisions or the make-up of the RPT, but that doesn't mean they are not meeting their regulatory mandate. NSRAA and local management didn't need to consult the RPT to make fishery changes to address the situation in 2018. The RPT accepts all PAR requests and Hatchery applications, and has detailed guidelines in place to evaluate and recommend approval or not. In fact, every request goes through the series of questions and is documented as to if it meets A, B, and C criteria. Representation is far from dominated by the PNPs. Every section of ADF&G is given the opportunity to weigh in as part of the permitting process, or has the opportunity to have their comments heard, prior to a vote that consists of 3 PNP representatives, and 3 Department representatives. Further, it is a recommendation to the Commissioner, not a rubber stamp. And lastly, perhaps the RPTs' role is unclear to the author. This statement was taken directly off the RPT web site under overview-

"Salmon fishery enhancement planning in Alaska is described in law (AS 16.10.375) and is the responsibility of Regional Planning Teams (RPTs). RPTs operate as described in regulation (5 AAC 40.300-370) and prepare regional comprehensive salmon plans, provide recommendations on PNP hatchery permit alterations and applications for new hatcheries, and may also review hatchery annual management plans. RPTs are composed of representatives from regional aquaculture associations and ADF&G staff. All RPT meetings are open to the public and public participation is encouraged."

SEAS represent the interests of the seine permit holders in Southeast Alaska. Over 1/3 of the fleet are paying members. All commercial salmon fisheries financially support the aquaculture industry through the 3% assessment, and also support Fish and Game financially with permit fees. These fees not only support CFEC, but more dollars are used to support management of Fish and Game than go into running CFEC. Our stakeholders have spent decades advocating and supporting the sustainable yield principle while trying to enhance natural production. This ACR is unwarranted. SEAS has asked that a discussion item be added to the December RPT agenda, to look at and analyze all available data concerning the Crawfish release, return, harvest, and impacts. That's how the process works, data and reality driven.

Respectfully,

Susan Doherty
Executive Director SEAS



Southern SE Regional Aquaculture Association

14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-8605; FAX 907-225-1348

October 7, 2019

Alaska Board of Fisheries
Mr. Reed Morisky, Chair

By Electronic Copy Only: dfg.bof.comments@alaska.gov

Re: Comments on 2019 Work Session ACR 2

Dear Chairman Morisky and members of the Board of Fisheries,

Thank you for the opportunity to comment on the above-referenced Agenda Change Request.

Southern Southeast Regional Aquaculture Association (hereafter "SSRAA") is a regional non-profit salmon hatchery organization formed under state and federal law, and which was originally incorporated in 1976. SSRAA, along with the other regional hatchery associations in the State, along with the associated Private Non-Profit (hereafter "PNP") salmon hatcheries in Alaska, have a substantial interest in the outcome of this ACR.

As a threshold matter, we assert that the subject of this ACR is properly within the delegated regulatory authority of the Department of Fish and Game (hereafter "ADFG" or "the Department"). The Department has been charged with and vigorously carries out this regulatory power and has operated with this understanding for many years, as have the regulated PNPs. The proponents of ACR 2 are seeking to force the Board into making decisions that are contrary to this established practice and may overlap and contradict the robust regulations that ADFG has put into place over decades using the best available science and precautionary concepts. ADFG has "direct and nearly comprehensive" responsibility for the PNP program under the applicable statutes and does its job well.

Now, to consider the merits ACR 2 in terms of the Board's criteria for agenda setting:

1. The Department determined that there is not a fishery conservation purpose or reason for ACR 2.

In permitting the Crawfish release, the Department's process considered the offset in return timing that the petitioner (hereafter "Pioneer") cites as a reason for Board action in ACR 2. It is common for the Department to manage fisheries in a given area for separate species of salmon as they return in sequence, and perhaps Pioneer did not fully consider that these two chum stock returns are offset just as if they were two distinct species. As a case in point, please consider that these two chum stock's return timing is offset enough that a hatchery-born fish would not be



successful reproducing in such an unfamiliar temperature regime. Fall-run chum are highly specific runs to highly specific locations. To cite an “unacceptable straying rate” as a result of the intentional separation of these two chum stocks does nothing to prove a fishery conservation purpose and shows a lack of understanding of the rigorous vetting that PNPs go through in order to permit new releases.

2. ADFG determined that this ACR does NOT correct errors in regulation.

In ACR 2, Pioneer asserts that the Regional Planning Team statutes were not written with enough emphasis placed on wild stocks of salmon. The fact of the matter is that no less than Article VIII of the *Constitution of the State of Alaska* requires conservation and sustained yield principles of fisheries resources. These enshrined principles are well-reflected in the actions of the RPTs and in the various ADFG departments that review all permitting decisions. It is also a fact that a great many permit requests by PNPs are either never brought forward from their embryonic states of development because of discussions with ADFG staff; or they are eliminated from consideration after new information comes out in the RPT meeting process; or the request gets substantially changed as a result of the RPT/Department process. Alaska’s deep and involved process for enhancement permitting, which has worked very successfully for over 30 years, Has stood the test of time and is sufficient to conserve and protect wild-born salmon.

3. The Department has determined that ACR 2 does not addresses the effect of a regulation on a fishery that was unforeseen when that regulation was adopted.

The Department had full knowledge of the adjacency of West Crawfish and its chum index stream in 2013 when a comprehensive team of fisheries, habitat and genetic professionals gave NSRAA a short list of potentially acceptable release sites. It’s also a standard operating procedure for an even more intensive review of the same type at the RPT once a permit alteration is requested. These reviews and the outcomes of them are the bedrock of enhancement permitting.

SSRAA respectfully requests that the Board use the information that its experts have provided, and not take up ACR 2.

Thank you for your attention to these issues.

SSRAA opposes the Board acting on ACR 2.

Sincerely,

David Landis
SSRAA General Manager



October 7, 2019

Alaska Board of Fisheries
P.O. Box 115526
1255 W 8th Street
Juneau, AK 99811-5526

To Whom It May Concern:

I am the Mayor of the City of Craig and commercial fisherman on board the F/V Zephyr. All fishermen and fish buyers in Craig, as well as tribal subsistence needs, are impacted by sustainable salmon harvest opportunities and salmon fisheries in Alaska.

Alaska's salmon hatchery program impacts my income, the city's income, and tribal subsistence needs for all of Prince of Wales.

Our hatcheries on Prince of Wales Island are a major component of our economy and our subsistence way of life. They affect all commercial fishermen in southeast Alaska as well as revenue for fishing communities here. The hatcheries are very critical to our very survival. ACR 2 has not met the criteria and needs to be reevaluated.

Thank you for lending this comment your full consideration.

Sincerely,

Timothy O'Connor
bestreekiller@msn.com



Mailing Address: PO Box 20229, Juneau AK 99802-0229
Physical Address: 410 Calhoun Ave Ste 101, Juneau AK 99801
Phone: (907) 586-2820 **Fax:** (907) 463-2545
Email: ufa@ufafish.org **Website:** www.ufafish.org

October 2, 2019

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Submitted VIA: Alaska Board of Fisheries Comment Website

RE: Opposition ACR 2

Dear Chairman Morisky and Board of Fisheries Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

ACR #2 fails to meet any of the three criteria required for an agenda change request and should not be allowed to move forward as an out of cycle proposal.

The State of Alaska has a rigorous and open public process to determine whether a PNP hatchery permit is warranted under the authority of the ADF&G commissioner. In addition, protection of wildstocks is paramount to the integrity of the enhancement program. Many safeguards are built into the regulations such as requiring use of nearby salmon broodstock and sliding scales for wild salmon eggs to ensure biological escapements are met during the development of the hatchery's first generation (BOF authority 16.10440(b)). The regulatory framework is structured to minimize impacts to wild stocks with strict protocols to protect fish health (fish pathology and transport policies), genetic integrity by using local stocks, locating enhancement programs spatially and temporally distant from significant wildstocks, and aggressive harvest management on enhanced salmon returns once they are segregated from wildstocks.

ACR#2 fails to establish a credible fishery conservation concern

The local streams in the Crawfish Inlet area are meeting their pink, chum, and coho escapement goals due to ADF&G fishery management. The West Crawfish wild stock has a summer run timing while the Medvejie stock is a fall run with a spawn timing in late August to late September. ADF&G recommended this site because of temporal separation according to their escapement survey data.

There is mention of impact of adult enhanced salmon eating prey the wildstocks would otherwise eat. It is well known salmon cease to eat when they near the terminal area to spawn. Salmon put their energy reserves into gonad development, final migration to spawn location, and mate selection, not chasing prey.



ACR #2 fails to correct an error in regulation

What the proponent has stated in this section cites no error. They may not like RPTs function, but they were established in regulation as a body that makes informed recommendations to the commissioner of ADF&G. The proponent has stated incorrect or outright false statements about RPTs being secret, or closed door or not allowing public comment. RPT public records demonstrate quite the opposite. The proponent appears to want to change regulations outside the scope of BOF authority. There is no error.

ACR #2 fails to correct an effect in a fishery that was unforeseen

All concerns articulated by the author have been considered by ADF&G since the inception of the hatchery program. These concerns are the basis for hatchery permitting to ensure the sustainability of our natural fish stocks. Disease, genetics, and ecosystem impacts are given strong consideration in the decision process for site and stock selection. Both in the beginning and now, the presence of hatchery fish in area streams, and potential for genetic introgression between hatchery fish and wild is neither unexpected, nor unforeseen. For this reason, this ACR fails the third criteria required for its consideration by the board.

UFA will be present at the October work session and looks forward to working with the board on these issues.

Sincerely,

Matt Alward
President

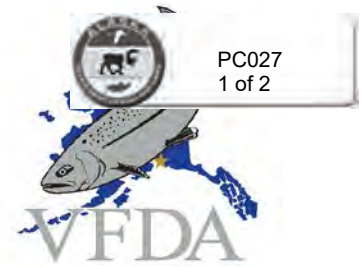
Frances H. Leach
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association
Alaska Trollers Association • Alaska Whitefish Trawlers Association • At-sea Processors Association • Bristol Bay Fishermen's Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Fishing Vessel Owners Association • Freezer Longline Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY

P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com



October 7th, 2019

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

via email: dfg.bof.comments@alaska.gov

RE: ACR#2 – Modify hatchery operations in Crawfish Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish (5 AAC XX.XXX)

Chairman Morisky, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to provide written comments on ACR#2. The Valdez Fisheries Development Assoc. Inc., provides the following comments pertaining to the suspension of a remote release of fall Chum salmon stock provided by the Northern Southeast Regional Aquaculture Association (NSRAA) at Crawfish Inlet.

The Alaska hatchery program has been in existence for nearly 40 years. During this time, hatchery programs have been expanded under the careful guidance of scientific based management and the use of a precautionary approach. This method has allowed Alaska to enhance all five species of Pacific salmon with little effect on natural salmon populations. Evidence of continued long term sustainability can be seen in all areas where hatchery production interacts with natural stocks and is reflected in the consistent achievement of escapement goals and robust natural returns to area fisheries.

The practice of remote release is an established method for enhancing fisheries, reducing fishery congestion and harvest pressure on natural stocks. To be permitted, applications must first pass rigorous scientific analysis for genetic and disease effects to natural stocks. And, contrary to the author's opinion, the Regional Planning Team process is transparent, and provides for a larger check and balance, which includes the recommendations of ADFG biologist and fishery scientists, and ultimately the commissioner before implementation.

VFDA opposes ACR# 2 because it fails to meet the criteria for consideration by the BOF. Like similar ACR's submitted to reduce or eliminate Prince William Sound Pink salmon hatchery production, this ACR also fails to meet any of the following criteria; (1) establish a credible fishery conservation purpose or reason, (2) correct an error in regulation and/or (3) correct an effect in a fishery that was unforeseen.

ACR#2 fails to establish a credible fishery conservation concern

While the author speculates about the potential effects of overlap of hatchery and natural stocks, the demand that wild stocks be differentiated from hatchery stocks is already provided by the separation of stocks through the use of different return timing. The fall chum stock used for this remote release provide sufficient temporal separation from the indigenous summer chum stock in the area. The presence of hatchery chum strays in area streams in high percentages is a result of the lack of overlap of the two stocks in question. The author's concern that hatchery strays as high as 97% in the months of September and October is what one would expect when the early stock has already completed its spawning cycle earlier in the summer. And, like the argument used for the concern of PWS pink salmon in LCI streams, the author fails to provide any actual numbers of fish for proper context in the discussion of actual stray rates.

The reference of a stray rate of 2% in many comprehensive salmon plans around the state is simply a recommendation based on studies of other species in the Pacific Northwest. This unachievably low rate of straying, as it pertains to Pink and Chum salmon in particular, is unsupported even within ADF&G as stated by previous staff testimony before the board. It is acknowledged that much higher rates of straying occur in nature. The author further uses work on Coho and Steelhead in the Pacific Northwest in a misguided attempt to cement 2% as a standard. Neither the stray rate from this study or the proposed effects of genetic introgression are applicable to chum salmon in this discussion.



Other references to the transfer of naturally occurring diseases (BKD) from hatchery strays to natural stocks is unsupported by department record. In reality, the extent or even remote possibility that this could become a conservation concern, is effectively reduced or eliminated by adherence to strict pathology practices for fish transfer permits and robust internal hatchery controls. These two safe guards prevent much of this concern from ever manifesting and being transferred to healthy natural stocks through remote release.

ACR #2 fails to correct an error in regulation

The author demands that the state develop new regulations to address concerns about hatchery production and to distinguish wild from hatchery stocks. No compelling arguments have been provided for the requirement of new regulation or the need to correct an error in existing regulation. Current state regulations governing hatchery permitting provides for the authorization of hatchery operations and fish transfer by those most qualified to ensure hatchery operations do not impact natural stocks. Regulation also guarantees a transparent public process through the Regional Planning Team to review and approve remote release sites for hatchery stocks. Simply disagreeing with the outcome does not elevate a concern to a level requiring a total redraft of governing regulation and state policy on hatchery programs.

ACR #2 fails to correct an effect in a fishery that was unforeseen

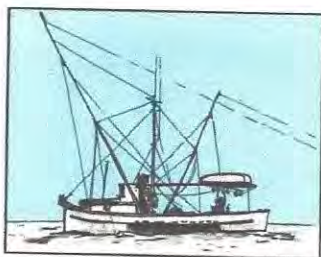
All concerns articulated by the author have been a consideration by ADF&G since the inception of the hatchery program in Alaska. These concerns lay the foundation for hatchery approval and permitting to ensure the sustainability of our natural fish stocks. Disease, genetics, and ecosystem impacts are given strong consideration in the decision process for site and stock selection. Both in the beginning and now, the presence of hatchery fish in area streams, and potential for genetic introgression between hatchery fish and wild is neither unexpected, nor unforeseen. For this reason, this ACR fails the third criteria required for its consideration by the board.

During the March 2019 work session, the board revisited the process outlined in the Joint Protocol on Salmon Enhancement #2002-215-FB. We thank the board for restarting this vital process to address public concern within the arena of factual and scientific based deliberation. At that meeting, it was generally agreed that matters concerning hatchery policy should be addressed using this protocol and not through the use of emergency petitions or ACR's. As such, we also strongly oppose the adoption of requests to amend hatchery production through the use of these methods or non-regulatory proposals to be taken up outside of normal board cycle.

VFDA hopes that the board will affirm its decision to use established protocol to further dialog on hatchery matters and once again refrain from elevating the agenda of a small group to a policy decision we feel goes beyond the board's authority. Thank you for your consideration.

Sincerely

Mike H. Wells
Executive Director



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
ata@gci.net

October 8, 2019

Reed Morisky, Chair
Alaska Board of Fisheries
Juneau, AK 99801

RE: **ACR 3** - *Designate Taku River king salmon a Stock of Management Concern and adopt an Action Plan.*

Dear Chairman Morisky and the Board of Fisheries,

Alaska Trollers Association (ATA) represents nearly 1700 commercial permit holders. Our fishery has been around for over a century and we have one of the highest Alaska resident participation rates in the State. We garner high prices for our fish due to the quality and care of the resource.

As mentioned by ADFG staff in RC2, the Agenda Change Request policy 5 AAC 39.999 does not include consideration of Stocks of Concern, **so ACR3 does not meet the criteria** to be considered out-of-cycle. Furthermore, the restrictions in the sport and troll fisheries that have been in place since 2018 and earlier to protect Taku, Chilkat, King Salmon River and Unuk Chinook have been highly effective, to the point where the harvest of Taku kings is already so minimal that additional restrictions could not possibly have any significant beneficial effect.

We appreciate the opportunity to provide our thoughts to you on taking this matter up out of cycle.

Sincerely,

Amy Daugherty
Executive Director



Southeast Alaska Fishermen's



PC029
1 of 1

1008 Fish Creek Rd

Juneau, AK 99801

Email: seafa@gci.net

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-523-1168

Website: <http://www.seafa.org>

October 7, 2019

Board of Fisheries

Mr. Reed Morisky, Chairman

P.O. Box 115526

Juneau, AK 99811-5526

RE: ACR 3 – Designate Taku River King Salmon as a Stock of Concern - OPPOSE

Dear Chairman Morisky and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a non-profit commercial fishing association representing our 330+ members involved in the salmon, crab, shrimp fisheries and longline fisheries of Southeast Alaska.

SEAFA opposes the designation of the Taku River King salmon as a stock of concern through the Agenda Change Request (ACR) process. SEAFA is concerned about the current status of the king salmon but ADF&G has taken substantial management actions to reduce the harvest of Taku King salmon in all fisheries including commercial and sport.

During the 2018 Southeast Board of Fish meeting, action plans for king salmon considered the status of the Taku King Salmon return and included some actions to protect the return. The Dept of ADF&G in their RC Staff comments on ACR 3 did not find this issue to meet any of the three criteria for an agenda change request. The Dept has the tools necessary to protect the Taku king salmon and you will be reviewing any stocks of concern for Southeast Alaska at the October 2020 BOF work-session.

Sincerely,

Kathy Hansen
Executive Director



October 7th, 2019

Good afternoon Chairman and Members of the Board,

My name is Angela Christensen of Petersburg, Alaska.

The Sitka Sac Roe Herring fishery has been part of my springtime since I was a little girl. My father would bring me to Sitka to pack herring back to Petersburg and I continued to do so every year until I perused a career in Commercial Fishing Fleet Management.

As a 3rd generation fisherman, my family's longevity and success has a lot to do with the sustainability of our resources. And I believe that the Department of Fish and Game has proven that they can maintain that ability, especially with Sitka herring.

There is no biological basis to reduce the harvest rate, area, or any other negative effecting change. The Department's long history of stock assessment and the care and consideration they put into their conservative guide line harvest level is reflected in the returning biomass each year. The Sitka Herring fishery is a sustainable fishery for all, subsistence and commercial.

Thank you, Angela

A handwritten signature in cursive script that reads "Angela Christensen".



Clyde Curry

PO Box 572

Petersburg, AK 99833

October 8, 2019

Board of Fish members,

OPPOSING ACR 4, SITKA HERRING. I oppose efforts to manage the Sitka herring fishery in an ACR. The proposal isn't an emergency. Fisheries fluctuate up and down, so there is no conservation concern. There is no new information. Listen to the Department, they have the science.

My name is Clyde Curry, and I'm a initial issuant of a Southeast seine sac roe herring permit. I was there before the Sitka herring sac roe fishery really got started. I started fishing in Alaska in 1963. I grew up fishing on Lummi Island in Puget Sound at my family reef net operation. My brother and I began gillnetting salmon when I was 12. By the time I was 16 we bought a boat and headed to Alaska. In 1966, we bought a salmon seine boat, the Puget, and fished it together in Southeast. I bought my own salmon seiner, the Louie G in 1968. In 1970, I married a local Petersburg fisherwoman and we built a business and a fishing family. I retired from fishing in 2017, and my daughter now fishes my herring permit.

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

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

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



Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526, Juneau, AK 99811-5526

October 1, 2019

Re: Letter from Alaska Board of Fisheries (BOF) to the Commercial Fisheries Entry Commission (CFEC) requesting CFEC to adjust the existing Northern Southeast limited entry spawn on kelp (SOK) herring pound fishery so that herring seine permit holders can have the option to utilize open pounds to harvest SOK in Sitka Sound.

Dear Chairman Morisky and Board of Fisheries Members,

As you remember, the Department of Law said you could not consider our proposal unless the CFEC changed the overlapping areas of the Northern SOK with the Sitka seine area. The Board sent CFEC a second letter, March 16, 2018, requesting the CFEC to adjust the area. The CFEC has not acted to allow the BOF to consider our proposal allowing Sitka herring seiners to harvest SOK as an alternative to harvesting herring with a seine net.

Two different letters were sent to CFEC, by current Sitka permit holders, asking when the process to change the overlapping area would begin. Commissioner Kelley responded to those letters saying the CFEC would not be changing the overlap.

Changing the harvest method for Sitka permittees would accomplish two main goals affecting the fishery. (1) The Sitka roe herring fishery did not harvest a pound of fish of their allowed harvest quota in 2019. The market for roe herring has disappeared. Hopefully it will recover in 2020 but Canada seems to be filling the market with their herring fisheries. SOK diversifies the products from the same stock of herring. (2) The Sitka Tribe has requested the BOF to raise the stock threshold to preserve more herring. The quota given to Sitka permittees utilizing the alternative harvest method of open pound would not kill any herring. Thus, it's like raising the threshold.

Our proposal of allowing an alternative harvest method, changing the product form from herring roe to SOK would help fix some problems for Sitka permittees. But it will not happen unless the overlap of areas is gone. We cannot propose the change because the BOF cannot rule on the proposal, according to the Department of Law, thus making the proposal useless. It is our understanding the purpose of the BOF is for conservation and development of fisheries resources [AS 16.05.251, AS 16.43.950]. We need the BOF to demand the CFEC, change the overlap.

Best regards, Darrell Kapp

PS: ACR 4 To Raise the Threshold, is not an emergency, nor appropriate at this time.

CC. Sitka Permittees, CFEC



To: Alaska Board of Fish Members
Re: Opposition to ARC 4

I am opposed to ARC 4. Sitka Tribe of Alaska, or their members, have constantly submitted the same or similar proposals and ARCs since the early 2000's. The issues were extensively vetted at the January 2018 Board of Fisheries meetings. The herring biomass is extremely high and ADF&G has the scientific data to manage the herring fishery in a sustainable manner. They have an excellent track record of doing so. There is a Southeast Board of Fish cycle coming up in 2021 which is where this proposal should be heard.

Sincerely,

Hughie Blake
commercial herring fisherman
Cordova, AK



Dear Members of the Alaska Board of Fisheries.

My name is Jamie Ross, I have been an Alaskan Commercial Fisherman for the past 39 years and I have participated in EVERY sac Roe seine fishery in Alaska Starting in 1991. I bought my Sitka Herring Permit in 1993, and my family and I have loved and enjoyed this fishery since then!

I am writing to you today to ask you to REJECT the ACR # 4 Request by the Sitka Tribe of Alaska, Every one of the arguments they make in this ACR have been heard NUMEROUS times before the BOF, starting over 20 years ago. They have also been brought in front of Courts, etc - and have been REJECTED every time!

The Sitka Herring fishery has been heralded around the State of Alaska and West Coast as one "of the finest and most carefully managed fisheries in the world". No other herring fishery ANYWHERE, does detailed in season biomass estimates, aerial surveys daily; miles of spawn documented daily; and after the season - a detailed spawn deposition survey to come up with an actual "escapement" of the total herring eggs!

This is then carefully calculated into an estimated biomass and total fish return - and is plugged into an elaborate formula that takes into account many different levels of mortality, and comes up with a returning population- out of which a very conservative level of harvest is allowed!

No other herring fishery anywhere on the Coast goes to this level of precise and accurate biomass numbers!

People like to talk about the "good old days" or "Back in ancient times" - however, the reality is much different than people like to think.

Before Europeans showed up in Alaska, and started decimating the Whale populations off Alaska, there were 10's of Thousands of Whales around Alaska - which obviously kept the Herring stocks at certain levels.

By the end of the 19th Century, Whales were hunted to almost extinction - and Herring stocks in Alaska skyrocketed! Herring reduction fisheries were able to extract 40-60,000 TONS of Herring out of SE Alaska alone, during the 20's and 30's! These huge harvest numbers took place in PWS, Cook Inlet and Kodiak as well.

By the time State hood rolled along in 1959, herring stocks had been decimated. It took years of careful management by our fledgling Alaska Dept of Fish and Game to rebuild herring stocks around the State.

By the time the modern Sac Roe Fisheries developed throughout the 70's, herring stocks were on the upswing. When I first entered the Sitka herring fishery in 1993, the quota was only around 3000 tons! This quota grew till we had an over 20,000 ton quota in the mid 2000's.



Now we are going through an age class transition, and we have carefully avoided harvest of smaller sized fish (since the Japanese market is extremely picky now-a-days) so we have left the smaller fish un-harvested, knowing they will grow bigger in a few years, and we will be able to enjoy a better size composition in the fishery in a year or two.

This is the beauty of herring - they live several years, and can spawn over and over again, so it is a privilege to be able to work with the Department and Processors, and only take the fish that meet the best market requirements, and know that they will spawn again and ensure the future of the fishery and resource!

The Alaska Department of Fish and Game has done an amazing job across our State, and the Sitka fishery is a shining example of this! There is nothing wrong with this fishery! Why would the Department have any reason but to do the absolute best for this fishery for ALL users? WE fishermen are NOT the enemy! Our livelihoods depend on the future of this fishery, and I want my children and future generations to enjoy the Springtime in Sitka that I have enjoyed for over 27 years!

Whales are returning to Alaska waters in ever increasing numbers, yet I'm sure that the ADF&G will take this into account, and make the necessary adjustments to our quotas and formulas to ensure the future of this fishery.

I am sorry that the STA does not like the fishery and seems to not like our presence in Sitka - I guess I don't understand this, since Commercial fishing has been a way of Life in Alaska for over 100 years. We are extremely conscientious about our utilization of the fishery, and have always been respectful and cooperative with our subsistence partners in the fishery!

The bottom line is; The Sitka fishery is already extremely well managed, and will continue to be so!

Subsistence needs are being met - unfortunately herring do not always spawn exactly where humans want them to! We have already closed area to commercial fishing - extensive area's around the town of Sitka for traditional subsistence use only. However, herring don't always spawn in these areas!

Whales will continue to increase in population, and will probably continue to eat herring! This undoubtably will reduce herring populations below what we've experienced as populations were being rebuilt after the reduction fisheries. However, the great existing management plans the ADF&G has in place will control commercial harvests, and ensure subsistence needs!

Herring populations fluctuate, and size's of herring dictate market demand! The Japanese sac roe market has definitely changed throughout the years, and the prices have declined. Because of this, it is EXTREMELY important for us to be careful about what we harvest, and what SIZE herring we supply to the market! Herring fisheries



NATURALLY change in size and age composition. This has happened a few times in the Sitka fishery in the past. The same situation is taking place in the Kodiak herring fishery right now, as in Sitka. LOTS of smaller, lower age class fish, with few larger, marketable fish. Therefore, we DO NOT FISH THEM! The fishery is healthy - the age structure of the fishery is just changing, and will be back to a more "normal" balance in a few more years!

Unfortunately, the PWS and Cook Inlet fisheries were damaged by Oil Spills or something else, and disease took over the populations, and they have taken decades to recover. Sitka, Kodiak and Togiak (Togiak had one of it's largest quota's EVER this past season!) herring stocks have remained healthy and have continued strong markets, albeit at lower prices than during the hey-day of herring Sac Roe fisheries. Japanese demand has definitely changed - but they still want the fish, and we fishermen still want to harvest herring for them!

Please let our ADF&G do their job in the exceptional manner that they always have! Please don't let rhetoric and emotional ideas from a small group of people who don't like a fishery in their home town, dictate how the finest management agency in the Western World does their job! I want to pass this fishery down to my children, and have almost 30 years of my life invested in the Sitka Herring fishery! I love this fishery and would NEVER want to see it harmed in any way!

Thank you for your time and consideration!

Sincerely,
Jamie Ross, F/V "Shadowfax", Homer, Alaska

RE: ACR 4 Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass (5 AAC 27.160).

It is ridiculous to raise the threshold level as the science acquired over many years proves that the biomass has never been in peril.



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

Dear Chairman Morisky, and Board of Fish Members,

I depend on the Stika Sound herring fishery for my family's livelihood. Cutting the harvest rate or raising the fishery threshold biomass is not necessary and would be particularly harmful to our operation. This change could make the fishery unprofitable for us and the other fisherman that participate as well as all others that rely on it, tendermen, processors, cannery workers etc.

There is no biological reason to reduce the harvest rate or raise the threshold biomass, the Department manages the herring fishery conservatively, and given that the biomass has risen from 5,000 tons in the 1970's to the present day of 55,000 tons plus is a testament to their sound management. Fishermen rely on sustainable and conservative management for our futures.

I am opposed to ACR 4 . The Department has demonstrated that a "reasonable opportunity" does exist, but participation by users has been declining over the past 30 years. There are sufficient eggs to be harvested there just needs to be sufficient effort to harvest them. I would also like to add maybe the Sitka tribe of Alaska could focus their energy and money on studying the waters that boarder the road system in Sitka this is were herring used to spawn and they where able to harvest roe with the least amount of effort. Herring don't spawn there anymore and maybe there is a pollution problem or some other factor that is affecting these areas. Maybe it is a landbased problem and not the Fishermen's fault. Just a thought.

Sincerely,

Nina Alber



Board of Fisheries
Work Session
Oct 23-23, 2019
Anchorage, Ak.
Opposition to ACR 4

Dear Chairman Morisky, and Board of Fish Members,

I would like to express my opposition to ACR 4. I am a lifelong fisherman and have participated in the herring fisheries in the state of Alaska since 1974(PWS, Kodiak, Cook Inlet Togiak and Sitka). I have been a Sitka Sac Roe permit holder since 2010 and have participated in this fishery since 1999. My family and I depend on this fishery for our livelihood. The Sitka herring fishery is one of the healthiest and well managed in the State (by the Alaska Department of Fish and Game).

If ACR 4 is considered it will be felt by all not just permit holders. The crewmembers, tendermen and their crews, processors and all who work for them, buyers of the product as well as the City of Sitka and the State of Alaska will suffer. There are no conservation issues facing this fishery as shown by the departments data, biomass of 5000 tons in the 1970's to over 55,000 tons plus today. The herring are abundant, the whales, sealions, and sea birds are thriving and plentiful in this area too. The subsistence needs can be easily met. The issue here is the lack of effort and the changing habits of subsistence users in the area.

Please realize this is not a new issue, we have been over this year after year with the Sitka Tribe of Alaska and I believe the 2021 BOF cycle will be no different. After two years of low or no harvest due to market conditions not biomass issues the Sitka Tribe of Alaska still has the same complaint with no new evidence to back their claims. The department has been collecting scientific data year after year and it is very clear that the fishery is in no danger of disappearing. Guideline harvest level or thresholds need no adjusting.

Sincerely,

Louie Alber

Owner/Operator

F/V Leading Lady



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

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Sincerely,

Marina Alber



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

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Sincerely,

Cassidy Alber



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

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Sincerely,

Alannah Alber
Alannah Alber



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

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Sincerely,

London Alber



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

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Sincerely,

Justin Odell



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

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Sincerely,

Jeffrey Allen



Board of Fisheries
Work Session
Oct. 23-24, 2019
Anchorage, Ak
Opposition to ACR 4

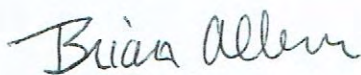
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Sincerely,


Brian Allen



North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

To: State of Alaska Board of Fisheries
Re: Opposition to ACR4

October 8, 2019

Dear Chairman Morisky and Members of the Board of Fisheries,

The North Pacific Fisheries Association (NPFA) was founded in 1955 and represents over sixty Alaskan fishing operations. Many of these operations participate in the Southeast herring fishery and depend on it as part of their fishing season. NPFA members include Southeast Herring permit holders, vessel owners, tender vessel owners, harvesters and tender deckhands. Some of our members have participated in the herring fishery for decades and we all support a sustainable fishery for the future. NPFA has a long history of supporting conservative, science based fisheries management and has demonstrated this philosophy by engaging with the regulatory bodies from local to international.

NPFA is opposed to ACR 4 and asks that the board take no action. We agree with the ADF&G Staff Comments (RC2) that this proposal does not meet the requirements of an Agenda Change Request. We agree with staff that there is no conservation issue with the Sitka Sound herring stocks at this time. They are at historically high levels since the fishery reopened in the 1970's. It is one of the most intensely managed fisheries in the state using science based formulas and models to actually account for the number of herring in the biomass that deposited eggs in the spawning event. The ACR states that the Sitka Sound herring stock is in decline but provides no evidence. All fish stocks show some degree of natural cycles depending on the variability of the survival of certain year classes, however the 2019 Sitka Sound spawning event covered 55.8 nm a 68% increase from 2018 of 33.1 nm spawn (May 17 ADFG new release). Additionally the main spawning event took place along the Kruzof Shoreline which has a very broad shelf that is very conducive to herring spawn, in 2005, 2008, and 2018 when this area received significant spawn the egg density was very heavy. Final deposition results won't be available until November, but it is highly likely the Sitka Sound projected herring spawning biomass will see a significant increase for 2020. We do not see any substantiated reason to adopt this ACR.

NPFA requests that the Board of Fisheries not adopt ACR4.

Respectfully,

G Malcolm Milne

President, North Pacific Fisheries Association

October 8, 2019

Alaska Board of Fisheries
Reed Morisky, Chair
Via email dfg.bof.comments@alaska.gov
<https://adfgcomments.psmfc.org/Meeting/Details/966>

RE: ACR 4 Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass

Chairman Morisky and Board Members:

Thank you for the opportunity to comment on ACR 4 for the Alaska Board of Fisheries (Board) October work session. As stated, this proposal would reduce the harvest rate and increase the biomass threshold at which the Sitka Sound sac roe commercial herring fishery may be opened without specifying a harvest rate and threshold values. PSPA opposes ACR 4.

PSPA is a nonprofit seafood trade association representing seafood processing businesses and their investment in coastal Alaska, including three shorebased processors located in Ketchikan and Sitka. In addition to shorebased processors, fishermen, tenders, pilots, support vessels, support businesses, transportation companies, the City and Borough of Sitka, and the State of Alaska (through fish taxes) are dependent on the direct and indirect economic activity that the commercial herring fisheries provide.

PSPA most recently commented on several proposals relevant to this fishery in January of 2018 during the Southeast Board cycle and again at the October 2018 Board work session. Some of these proposals worked to modify the existing GHF formula used by ADFG. Other proposals intended to expand the closed water areas for the commercial sac roe herring fishery in Sitka Sound. The Board approved an increase to the closed water areas in consideration of subsistence interests at that time, and this is in addition to significant changes made to the fishery by ADFG, the Board, and the commercial herring fleet in order to meet similar concerns in the past several years. The closure was not insignificant, as it closed an additional four miles of fishable waters available to the commercial fishery.

The Sitka Sound sac roe herring fishery alone has generated a total of \$70 million in ex-vessel revenue over the last decade, and supports a fishery in which the vast majority of permit holders are Alaska residents. Closing or further restricting this fishery would substantially impact many fishermen (48 permit holders) and processors reliant on the fishery. These businesses rely on science-based and sustainable fisheries management and are invested in the future of this fishery for generations to come. ADFG recognizes that current harvest rates for the herring population were designed to be conservative and sustainable based on comprehensive historical data while also continuously incorporating new data and information.



In 2019, fishermen and processors made the decision to stand down for the fishery due to an extremely large volume of small (young) fish. There are significant volumes of young year classes of herring in Sitka that are not yet large enough to be desirable on the market, which resulted in the decision not to harvest herring in Sitka in 2019. Fishermen and processors chose to leave fish in the water to harvest in future seasons. Variable annual biomass trends are not an indicator of poor management, a stock collapse, or need for a fishery closure, but are accommodated in the existing process to set harvest rates using the best available data. Alaska's commitment to sound science is clear through allowing these data and the expertise of fishery scientists and managers to drive decision-making and regulate fisheries appropriately and responsively. In the 2018 Southeast Board cycle, ADFG conveyed that the current harvest strategy is based on the best scientific information available to Alaska and contains conservation provisions to protect herring stocks and their role in the ecosystem. In addition, ADFG has made significant efforts to gather additional data and as a result, the department is in the process of upgrading the model used to estimate and forecast herring biomass. ADFG intends to use this information in the future to re-evaluate the harvest strategy.

Absent a scientific basis for doing so, it is not reasonable to approve ACR 4 to change the guideline harvest level and increase the commercial fishery threshold biomass. We support ADFG's efforts to update the harvest strategy and incorporate updates to the forecasting model. Until that information is available, ADFG should continue to use the existing process to determine harvest rates and manage the commercial fishery sustainably and in concert with subsistence needs. Importantly, we must recognize that ADFG manages the herring fisheries to be responsive to the concerns and needs of subsistence users both inside and outside of closed waters, and has not only the authority, but is directed to, distribute the commercial harvest, by time and area, as necessary to ensure a reasonable opportunity to harvest ANS for herring spawn.

Thank you for your consideration of our comments and for your public service.

Sincerely,

Nicole Kimball
PSPA – Anchorage

RE: ACR 4 Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass (5 AAC 27.160).

I am wondering when we are going to believe the science behind the biology. Sitka Herring looks like one of the most studied biomasses in Alaska. The department does an incredible amount of research. I see they are the ones to determine the GLH. Lets not treat this like global warming. Trust the science.



October 8, 2019

On ACR #4 on Sitka herring sac roe fishery

Comment by Peter Bradley

Dear board of fisheries members,

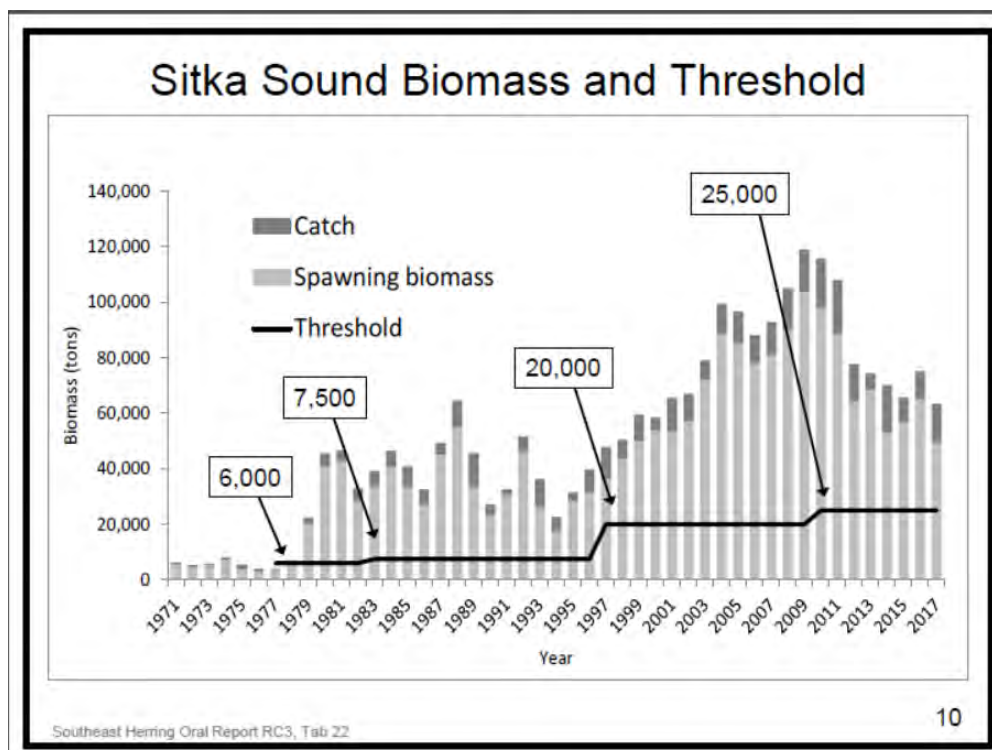
My name is Peter Bradley, and I am writing in support of Sitka Tribe of Alaska's ACR #4. I have been independently conducting a review of the history of herring fishing in Southeast Alaska for a few years now. I've been tracking a history of the science of the fishery alongside the history of the conflicts around the fishery and the social history of abundance and decline.

I set out to do this work once I realized that the historic data presented by ADFG was being privileged over the testimony of tribal members and other subsistence users and local observers, and that subsistence use was not being prioritized.

I have found clear evidence that ADFG's historic data has been misunderstood and misrepresented by the department. This misrepresented leads to a false impression of current abundance and has been at the heart of all Board of Fisheries decisions in recent decades. It is important that this board take strong action to correct past errors which have caused so much harm,

The ADFG biomass chart

I want to focus on the centerpiece of ADFG's herring data - the biomass chart purportedly measuring herring biomass in Sitka Sound since 1971. It comes up every BoF cycle, presented by ADFG staff as the most persuasive single argument in favor of the herring fishery. Here it is:



To start, let's acknowledge the stark difference between the 1970's and present day. To believe the



chart is to believe that there are ten times as many herring in Sitka Sound now as there were in the 1970's. That's just not what people say, though, as every Board of Fish member has learned through citizen testimony since statehood; most Southeast Alaskan communities have their own story about when fishing pressure demolished their home herring populations.

Bad data...

The biomass graph presents a very convincing case for healthy stocks, but the conclusion it proposes is falsely premised. Simply put, through increased survey range, efficiency, and intensity of study ADFG's count of the population has increased steadily over the years. **Better study and a larger area has meant a greater number of fish counted over the years without necessarily meaning a greater number of fish.**

Upon review of ADFG reports and extensive newspaper records from 1971 to present day, it appears clear that the way that ADFG measures both the biomass of herring AND miles of spawn in Sitka Sound has fundamentally changed in most regards in the course of those years. The research model has in some regards come a long way from the experimental management of the 1960's, 1970's, and 1980's. For those years, we have a lost history; we shouldn't pretend to know the biomass of herring in those years in "sitka sound". This is because the survey sets have changed and the data isn't calibrated, the results haven't always been directed towards the same purposes, and important details have been lost to time. The year over year data about biomass and mileage of spawn is not appropriate for comparison.

At first, ADFG's goal was to learn how to measure biomass and to calibrate between different measurement systems. Full biomass assessment wasn't the goal of the research until the mid-1980's. Measurement techniques didn't stabilize until the mid-1990's. Perhaps most importantly, the study area from which biomass measurements are derived has expanded regularly from the early days to now.

The biomass estimates in the 1970's and into the 1980's were based on a study area that centered around the wintering populations in Katlian Bay and later - after 1978 - Eastern Channel. With time, that area grew. Salisbury Sound is the most clear example of an area that was not studied in the first half of the history of the fishery but is now studied on an annual basis.

I've tracked several general categories of change in the Southeast Alaska herring fisheries (with particular focus on the Sitka region), and I have concluded that these changes in research models and practices have distorted our interpretation of older data in ways currently unacknowledged and unaccounted for by ADFG.

The full effect of these changes is that the accuracy of the report delivered by ADFG to the Board of Fisheries at every meeting cycle for decades has featured intensely deflated numbers in the earlier years of the fishery and higher, more accurate numbers in later years.

The message delivered by ADFG staff at Board of Fisheries meetings is: "We know what low/depleted/unhealthy/worrisome is, and this isn't it. Everything's fine. Keep fishing." It's an inappropriate conclusion given the data, and it perpetuates the harm done to Southeast Alaska by industrial herring fishing for over 100 years.

The areas of change that I'm tracking are as follows. I can provide further documentation of each upon request:



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?

Change in research methodology

There have been two major paradigm shifts in research/data collection methodology since the beginning of the modern research program in 1971

The first occurred gradually, as hydroacoustic studies were phased out in favor of spawn deposition surveys.

There are a few important things to note about hydroacoustics

Through the 1970's, any aerial surveying and spawn deposition surveying was designed as a groundtruthing of hydro-acoustic estimates and - as advised in ADFG research reports in those times - should not be taken as comprehensive.

The numbers cited nowadays as the "biomass" of herring in Sitka Sound for 1970's years was derived from the single largest survey of that year. Put another way, the biomass number for those years refers to how many herring were identified in a 1 square mile area in a 1-2 hour period. This reflects a minimum possible biomass of herring in Sitka Sound

Further - there were many shortcomings for hydroacoustic studies, which is why they were phased out. These shortcomings were commonly referred to in ADFG research reports, and include the following:

Hydroacoustic technology was not able to measure herring in the shallows.

Hydroacoustic studies worked better at night to avoid tape saturation in the daytime when herring were deeper

The accuracy of hydroacoustics declined past a certain saturation point

Hydroacoustics were labor and time intensive.

It is easy to see how each of these factors would contribute to a minimization of biomass numbers for those years.

The effect of the above factors on biomass numbers can't be overstated.

The most important effect is that hydroacoustic studies provided a number that was the MINIMUM known biomass of herring in Sitka Sound. Spawn deposition and ASA models provide a guess at the ABSOLUTE biomass of herring. The resulting numbers from the different study phases have been compared by ADFG in an unannotated time sequence for decades - a gross misrepresentation of the meaning of the data.

The second shift, also gradual in some regards, occurred in 1994 (and has continued to evolve), as Age Structured Analysis (ASA) models have replaced spawn deposition surveys.

The evolution of ASA is much more difficult to track, but it is clear that transparency has been a major issue in the ASA era. The models are murky and adjustments to data have been poorly documented.



☐ The models don't go back to the 1970's, but they go back far enough to be influenced by some of the misused data sets described in this document.

☐ **Change in research goals**

☐ Here are three excerpts, from 1971, 1975, and 1983, pointing to major early shifts in research goals.

☐ 1971:""Since the start of the present research program in Southeastern Alaska in 1969, enumeration of the herring stocks has been one of the primary objectives... ..In 1971, the Fisheries Research Institute at the University of Washington was contracted to acquire and assemble for the program a suitable hydroacoustic data acquisition system, develop the appropriate data analysis procedure and analyze the data collected. The major emphasis during the first year was to be on equipment development (Moberly and Thorne, 1971). The emphasis during the second year was on survey design and to make improvements on the original system (Moberly and Thorne, 1972)."¹ "

☐ 1975:"An expanding industry, hungry for herring to satisfy sac roe and fillet markets, is pressuring the State for increased harvests. To fulfill State management responsibilities increased funds and efforts will be required to parallel industry expansion. Updated acoustical equipment, a new State vessel" and comprehensive spawning ground surveys are scheduled for 1975"²

☐ 1983:" The present commercial interest , especially in herring sac roe, has justified study of major herring spawning areas. Specifically, the baseline information collected is used to assess herring escapement, and to document spawning ground conditions. Total biomass of herring can be computed from estimates of egg densities combined with the area receiving spawn. A percentage of the estimated biomass can then be used as a harvest level for the fishery. A large variation in density was observed as the result of the extent of egg deposition and available substrate. The spawning ground assessment function is the most important segment of the project. Management strategy is to maintain a certain level of mature herring biomass (established threshold escapement per stock). This level is designed to protect the stock from sharp reductions due to recruitment failure **and to maintain abundance levels adequate to supply forage for commercially important predator species such as salmon.** A harvest strategy developed in 1983 provides for a varied annual harvest rate from 10% to 20% when stocks satisfy an established threshold level"³

¹ Assessmet of Southeastern Alaska Herring Stocks Using Hydroacoustical Techniques 1970-1971

² 1975 Report to the BOF

³ Pacific Herring Harvest Statistics and a Summary of Hydroacoustical Surveys Conducted In Southeastern Alaska During the Fall, Winter, and Spring of 1980-1983



❑ Change in study area

❑ The history of this fishery demonstrates that for most of the 1970's Katlian Bay was the core research and fishing area in Sitka Sound, and that the expansion to the much larger area has occurred steadily with time. While present elsewhere in Sitka Sound, herring populations were not surveyed outside of the Katlian Bay area until 1979.

❑ ADFG was focusing on Katlian as a means to have appropriate year by year comparisons of what they saw as a local or wintering stock. "While the acoustic techniques theoretically provide estimates of absolute population size, the principal need at this stage is for a relative index of population magnitude for annual comparison, Most fisheries are managed by relative rather than absolute indices. The major emphasis on future surveys must be to expend the necessary survey effort to obtain sufficiently precise estimates for year to year comparisons," ⁴

❑ About the proposed BoF winter herring area expansion to Goddard, the Southeast Alaska Seine Boat Owners and Operators said this: "There is no herring fishing in this area for bait or food. ***There are winter stocks that have never been surveyed since statehood and should be surveyed and utilized.***" ⁵

❑ 1978 was the first year that the fishery occurred outside of Katlian Bay - It occurred in Eastern Channel with a very conservative quota to account for the fact that the herring population in Eastern Channel was not being researched at the time

❑ The research area expanded in 1979, and has expanded continually since.

❑ Katlian Bay wasn't the only place where herring were milling and spawning in Sitka Sound in the 1970's, and there are several documents which establish this.

❑ This excerpt from the Sitka Sentinel from April 1978 tells the story of what was going on: "Earlier in the season Department of Fish and Game research biologists, using **electronic hydro-acoustical gear**, had made a population estimate of 29 million pounds of herring in the **area of Sitka Sound west of the bridge**. This was the **largest specific wintering population estimate** made in Southeast Alaska since this research began in 1969. Jim Parker, commercial fisheries management biologist for the Sitka area, noted that the Department is **committed in the management of these sac roe fisheries to minimize the harvest of immature herring** and to not open these fisheries **until at least a 10 percent mature sac roe can be obtained in the harvest**. Test fishing in the area west of the bridge showed that a large percentage of the herring population consisted of immature fish and samples showed that the percentage of the

⁴ Assessment of Southeastern Alaska Herring Stocks Using Hydroacoustical Techniques 1970-1971

⁵ Board of Fish Proposals 212, 213, December 1977, Anchorage.



mature sac roe recovery would not reach ten percent. This situation persisted until after spawning began and therefore **no fishery was allowed** in the area west of the bridge. If test fishing had shown that mature herring with an acceptable recovery of mature sac roe could be obtained, a fishery near the 10 percent harvest level of about 1,450 tons, would have been possible this year. On the east side of Sitka Sound test fishing samples showed a large proportion of mature fish and a possible mature sac roe recovery of 11 percent. However, **because it is not known** whether the herring on the east side are a **separate spawning stock, only a small portion of this area was opened** to commercial fishing. **This restricted fishing area included only half of the area where schools of herring were observed along the beaches from aerial surveys."**⁶

☐ Let's count the fish ourselves. There are 29 million pounds of herring in the area West of the bridge (specifically, these were counted at Dog Point on March 23rd, 1978), but they were small (presumably from being fished for years). But then there were a bunch of fish in Eastern Channel, for which we had no data, and so ADFG made it possible to fish in an area occupied by half of those herring. Meanwhile, we know that there were herring in Necker, Whale, and Crawfish in those days, and we know that there were herring in Goddard. And yet, somehow, in ADFG records, the final biomass showing for herring in Sitka Sound in 1978 is... 6,420,000 pounds, a contrived number that reflects a hasty guess at how many herring were in Eastern Channel.

☐ Does that reflect the biomass of herring in Sitka Sound?

☐ No, it does not reflect the biomass of herring in Sitka Sound.

☐ Is it close?

☐ No, it is not close.

☐ Is this true for other years?

☐ Yes, it is true at least through the 1980's.

☐ **Flight patterns, focus, and intensity have also changed dramatically over the years**

☐ The degree and kind of change has often been explained clearly in reports

☐ One example that I have documented is an increase in the intensity of flight surveys to Salisbury Sound since the late 1980's.

☐ It seems likely that survey intensity has increased in this region as ADFG has withdrawn survey effort from other sites in Southeast

☐ It seems likely that "miles of spawn" measurements are higher resolution now than they once were.

☐ **Change in relationship between management and industry.**

☐ In the sac roe years, the relationship has grown steadily more collaborative between industry and ADFG, and with steadily more trust given to the industry.

☐ This transition was especially important in the 1980's as price-per-ton rose and the research program settled in. The fishery opened WAAAAY up for the fishermen - and one of the major manifestations of this was more permissive exploration for herring.

⁶ Sitka Sentinel, Herring Sac Roe Fishery In Sitka Nets 250 Tons, April 19, 1978.



☐ And the quickest path to that expanded exploration was in co-op years. I have found clear documentation that every time there is a co-op year, the regulations loosen up to match the circumstances. Following co-op years, the new informal boundaries of the regulations are the ones set by the last co-op. **This is how Eastern Channel, and then Goddard, and then Nakwasina, and then Salisbury Sound became regularly fished areas - fishermen were first allowed to explore those areas in co-op years.**

☐ This runs directly contrary to the presumed narrative, that expansion has happened in/due-to years of abundance. The opposite is true: area expansion happens due to bad fishing years.

☐ There are several other examples. The newspaper articles of the 1980's in particular documents the tug-of-war between the industry and management biologist Bob DeJong for influence over the fishery. The industry gained a lot of ground in those years.

☐ The fleet did not always contribute so much to the research. That has been a gradual shift. The effect of the shift is that the management biologist has a lot of extra people and equipment out on the water looking for fish.

☐ Change in fishing technology

☐ Technology shifts have made massive change to the thoroughness of research and fishing efforts — echo-sounders, more powerful skiffs, spotter planes, etc. One study suggests that fishing fleet power doubles every 35 years, and we can see that echoed in the history of the herring fishery.⁷

☐ Change in ecological assumptions

☐ Interpretation of stock dynamics has changed fundamentally over the years. Most herring studies and research programs in Southeast Alaska from the early 1920's through the 1970's was built on an understanding that herring were members of discrete local stocks. That understanding has shifted dramatically in recent decades to a rejection of local stocks and an embrace of more nomadic regional meta-populations. "Fish move" is a common refrain nowadays to complaints about herring population decline.

☐ The regional meta-population model does not explain any of the historic knowledge that we have about herring, whether passed down through previous research reports or through oral histories. It appears to be an unfounded assumption, though it is a convenient mask for depletion.

☐ It seems more likely that since ADFG studies only happen in commercial fishing areas, the commercial fishing has wiped out local populations. This would better reconcile ADFG data with community testimony.

☐ ADFG, 1978: Biomass assessments which are conducted by the Alaska Department of Fish and Game (ADF&G) on major stocks do not account for small discrete stocks found in most of Southeastern bays."⁸

⁷ Maria L. D. Palomares and Daniel Pauly . On the creeping increase of vessels' fishing power. <https://www.ecologyandsociety.org/vol24/iss3/art31/ES-2019-11136.pdf>

⁸ Blankenblecker, 1978 Report to the Board of Fisheries Southeastern Herring



¶ In 2018, the Ocean Modeling Forum released a paper by Alec MacCall, et al, *A heuristic model of socially learned migration behaviour exhibits distinctive spatial and reproductive dynamics* (OMF links: [Fact Sheet](#), [Paper Summary](#), [MacCall et al 2018](#)) which I urge BoF members to read.

¶ It poses a model for spatial and reproductive herring dynamics which actually seemingly manages to reconcile many of the discrepancies existing between ADFG research and local observation over the decades across Southeast Alaska.

¶ The model asks what it would mean for fish populations if we assume that herring “recruits learn a viable migration path by randomly joining a school of older fish” (termed the “Go With Older Fish” strategy) as opposed to the Diffusion or DIFF strategy, where “recruits adopt spawning sites near their natal site without regard to older fish, with GWOFF, where recruits adopt the same spawning sites, but in proportion to the abundance of adults using those sites.”⁹

¶ The paper finds that “An important implication of our results is the tendency toward local site extinction when fishing interacts with the GWOFF strategy. This local loss of sites is potentially overlooked by standard stock assessment procedures.”¹⁰

¶ This model explains, for instance, why many of the spawning beaches which were once reliable for subsistence no longer are, while also explaining why it is still possible to find a very large mass of herring in Sitka Sound despite that problem.

What I've demonstrated above is that your predecessors made their decisions about herring population health based on ADFG's poor and damaging interpretation of historic departmental data. It is clear that the historic numbers are radically deflated.

I shared the bulk of this information with department staff back in April and I have yet to receive a meaningful reply.

Please take this opportunity to ensure that Southeast Alaska's herring populations can begin to return to historic abundance, creating ecosystem health and resilience, providing for subsistence need, and strengthening all of those fisheries which depend on herring as forage fish.

Best,

Peter Bradley

⁹ Alec MacCall, et al 2018.

A heuristic model of socially learned migration behaviour exhibits distinctive spatial and reproductive dynamics. Ocean Modeling Forum. P1.

¹⁰ Alec MacCall, et al 2018.

A heuristic model of socially learned migration behaviour exhibits distinctive spatial and reproductive dynamics. Ocean Modeling Forum. P8



Raymond M May, F/V Sitkinak

Po Box 8985

Kodiak, Alaska 99615

Board of Fisheries

October 23-24 Work Session

Anchorage, Alaska

October 7, 2019

RE: Agenda change request ACR 4, Reduce the Sitka commercial sac roe fishery guideline harvest level and increase the threshold at which commercial harvests may begin

Dear Chairman Morisky and Board of Fish Members:

I was born and raised on Kodiak Island. I'm an Alaska Native fisherman that is enrolled in two tribes (Native Village of Port Lions & Native Village of Afognak), along with being a shareholder of three Native Corporations (Afognak Native Corp., Leisnoi Inc., & Koniag Inc.) I've been a subsistence, sport, & commercial fisherman in Alaska for 40 years. I seine for salmon in Kodiak and Prince William Sound, seine herring in Sitka and Togiak, and other fisheries around the state.

I don't believe ACR 4 should be taken up out of cycle because it doesn't meet the criteria. We just went thru ACR 4 issue January 2018 in Sitka and then again in October. Is there really new information on this issue? I have had a Sitka sac roe herring permit since 2014 and I personally saw plenty of herring biomass to warrant enough fish for a subsistence harvest in Sitka all of the last five years. Permit holders have taken a conservative effort to ensure a healthy future in this fishery.

As a commercial fisherman I have a business plan to execute & pay for this permit I purchased 5 years ago. I do not see any biological reason to reduce harvest rate or strategy. I repeatedly hear Alaska has the best managed fisheries in the world. I have only seen the ADF&G conservatively manage Sitka herring sac roe fishery as the overall biomass of herring around Sitka Sound has increased over the past 40 years. There is plenty of data already presented in regular meeting cycles to support my stance on ACR 4. Thank you for your time & consideration.

Sincerely,

Raymond May, owner F/V Sitkinak



Southeast Alaska Fishermen's



PC042
1 of 1

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October 7, 2019

Board of Fisheries

Mr. Reed Morisky, Chairman

P.O. Box 115526

Juneau, AK 99811-5526

RE: ACR 4 – Sitka Sound sac roe herring fishery – OPPOSE

Dear Chairman Morisky and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is opposed to the acceptance of a proposal on Sitka Sound sac roe herring fishery as an agenda change request (ACR). This proposal does not meet any of the criteria for an agenda change request proposal, has been heard at the last several Southeast Board of Fish meetings, (quite extensively in 2018) and Southeast herring is scheduled for consideration during the 2021 Southeast cycle.

ADF&G has shown their ability to manage based on the data available in season. ADF&G did not open the herring fishery in 2019, due to market considerations. This acknowledged the significant biomass of young fish which did not separate from older more marketable herring. ADF&G is working on a new model and determining if the threshold is appropriate. They are doing this by incorporating new data and information as they have been working with herring managers from outside of Alaska. These efforts ensure that the management plans are not only adaptive but are also based on the best available science. An analysis will likely be available by the 2021 SE Board of Fish meeting.

We also oppose the acceptance of an open-ended proposal that does not provide a preferred solution.

SEAFA is a non-profit commercial fishing association representing our 330+ members involved in the salmon, crab, shrimp fisheries and longline fisheries of Southeast Alaska.

Sincerely,

Kathy Hansen
Executive Director



P.O. Box 714
Ward Cove, AK 99928
(907) 220-7630
info@seiners.net www.seiners.net

Board of Fisheries

Opposition to ACR #4 - Sitka Tribe of Alaska

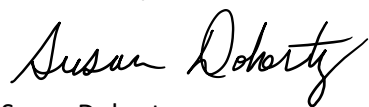
Dear Chairman Morisky and Board of Fish Members:

Southeast Alaska Seiners Association (SEAS) represent the interests of the seine permit holders in Southeast Alaska. We were present at the most recent 2018 BOF meeting in Sitka, where there were days of very emotional and heartfelt testimony by tribe members about their subsistence needs and difficulty in attaining it. The commercial sac roe fishery has not taken place in the two years subsequent to this meeting, yet subsistence needs have still not been met. It isn't the commercial fishery that is impeding meeting their subsistence guideline harvest, but rather the change in location of spawning activity; and more importantly the current generation of subsistence users' lack of desire to harvest them.

Prior to 2018, Silver Bay Seafoods made resources available to allow for transportation of boughs to various locations, and the subsequent delivery of spawn on branches to the native population in Sitka to distribute among the tribe. For whatever reason(s), the tribe has declined this offer since 2018, and subsequently has not met their harvest guideline even without a fishery.

ADF&G has documented that the biomass in Sitka is high, irrespective of not meeting subsistence needs. There is only one more potential harvest season in 2020 before this issue will come into its normal BOF cycle, and the actions of the Department and harvest level of the commercial fishery in the last two years have not demonstrated an emergency. ADF&G is working on presenting an update to the model they use, and it will be available for the 2021 meeting cycle. We implore the BOF to base decisions on science, and not emotions, and to be prepared to review this issue at the January 2021 meeting in Ketchikan.

Respectfully,



Susan Doherty
Executive Director, SEAS



SOUTHEAST HERRING CONSERVATION ALLIANCE



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

October 5, 2019

Alaska Board of Fisheries
Work Session Comments
Agenda Change Requests
October 23 & 24, 2019, Anchorage

RE: **OPPOSE ACR 4**, Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass.

Dear Chairman Moriskey and Alaska Board of Fisheries Members:

The Southeast Herring Conservation Alliance (SHCA) welcomes the new members and submits these comments on Agenda Change Request (ACR) 4 “Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass” that you will be considering at the Board of Fisheries (BOF) October 2019 Work Session. We thank you for the opportunity to comment on this important issue, and we once again request that you take no action on this ACR as it belongs in the Southeast and Yakutat Finfish (Southeast) BOF cycle.

SHCA is a 501 (c)(6) nonprofit organization that represents the interests of herring fishermen, processors, tender operators, crew, pilots, support businesses and families associated with herring fisheries throughout Southeast Alaska. SHCA members participate in the Sitka Sound herring sac roe fishery and other Alaska herring fisheries. Forty-four sac roe permit holders of the 48 total permits in the Sitka Sound herring sac roe fishery are SHCA members.

SHCA strongly opposes ACR 4, which seeks to reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level (GHL) and increase the commercial fishery threshold biomass. SHCA recommends that the Alaska Board of Fisheries confirms Alaska Department of Fish and Game’s (ADF&G) assessment of ACR 4, including: a) there is not a fishery conservation purpose or concern, b) the agenda change request does not correct an error in regulation, and c) the agenda change request does not address an effect of regulation on a fishery that was unforeseen when the regulation was adopted. Apart from consideration of technical arguments in opposition to the proposers’ arguments, this ACR does not meet the criteria for being heard outside of its regular cycle.



Criteria A: there is not a fishery conservation purpose or concern.

The conservation and protection of Sitka Sound herring are built into the equations and formulas used to determine the fishery's harvest threshold. Currently no harvest can occur in the Sitka Sound commercial sac roe fishery until the spawning biomass reaches 25,000 tons (adopted by the Alaska Board of Fisheries in 2009); the GHL for this fishery is not less than 12%, and not more than 20% of the forecast mature biomass. Most herring stocks in Southeast Alaska are considerably smaller than the minimum threshold of the Sitka Sound stock. The minimum threshold enabling a fishery has increased for the Sitka stock from 6,000 tons in 1977 to 7,500 tons in 1983 and then was raised to 20,000 in 1997 as the biomass continued to increase. This was viewed as a conservation action even though there was no discernable biological need, nor had ADF&G recommended either the 20,000- or 25,000-ton threshold. By way of compromise to minimize loss of commercial harvest, the board adopted the "2+8" formula during the 1997 board cycle. In 2009 the Board of Fisheries again increased the minimum threshold, this time to 25,000 tons for added conservation at lower stock levels, although there was no conservation need demonstrated nor was this supported by ADF&G. This was done at a time when the Sitka Sound herring stock's spawning biomass expanded to over 100,000 tons.

Time and again the BOF has shown a willingness to interject increasingly conservative approaches towards managing the Sitka Sound commercial herring fishery, including during the most recent regular board cycle culminating in Sitka during the board's January 2018 Southeast and Yakutat Finfish and Shellfish meeting. We argue that there have been no new developments with the Sitka Sound herring fishery resource to warrant out-of-cycle regulatory action. And, contrary to the proposers' assertions, all indications are for moderate improvements to the stock since the board's January 2018 deliberations, including an estimated 19% increase in observed spawning biomass for the Sitka Sound herring stock between 2017 and 2018. Further, ADF&G estimates that total herring egg deposition in Sitka Sound increased by 15% between 2017 and 2018, with an increase in egg deposition of approximately 548 billion eggs. Finally, ADF&G mapped 55.8 nautical miles of herring spawn from March 24 through April 13 in 2019, which is 1.69 times that which was observed in 2018 and is approximately 95% of the long-term average (1979–2018) for the stock. And though the 2019 spawn mileage estimate is slightly less than the long-term average, ADF&G (2019; Appendix 7) reports that preliminary results from the 2019 spawn deposition survey indicate that the offshore width and density of herring spawn were greater than average. Final results from this year's Sitka Sound herring stock assessment will not be available until November 2019, although preliminary department analyses indicate that the Sitka Sound herring stock biomass increased again in 2019.

As per the department's Staff Comments (RC2) in response to ACR 4, the Sitka Sound herring stock's abundance is currently more than double the 25,000-ton threshold, and recent upturns in 2018 and 2019 do not indicate a conservation problem. ADF&G characterizes Sitka Sound herring abundance as moderate relative to historical abundance over the past four decades. From 1999 until 2009 the stock increased from a spawning biomass of approximately 50,000 tons to an all-time peak biomass of 104,000 tons and has returned to the 50,000-ton range in recent years. According to ADF&G, downturns in Sitka Sound herring biomass following this peak abundance is attributable to two weak three-year-old age classes (2012 and 2014). However, the 2013 age three fish were strong, and a review of the historical data shows that the 3-year-old



component has had multiple years of strong, weak, and moderate recruitment. Further, high recruitment was observed for the Sitka Sound herring stock and the other four Southeast Alaska herring stocks that were sampled in 2019, suggesting that regionwide or larger ocean conditions had a positive impact on larval and juvenile herring survival. None of this information specific to the Sitka Sound herring stock is indicative of a fishery conservation purpose or concern.

SHCA supports ADF&G's efforts to continue to peer review their biomass model and update the GHL threshold and harvest strategy as new scientific information becomes available. If ADF&G data indicates changes to the fishery threshold biomass and GHL are necessary, then we will support those efforts in order to ensure sustainable herring abundance. Fishermen, processors, tender operators and others rely on sustainable fisheries management that allows for fisheries to occur well into the future, as opposed to one or two seasons.

Although there was no 2019 herring fishery in Sitka, this was not due to a low abundance or lack of available fish. Harvesters, processors and ADF&G agreed not to hold a fishery this year due to the abundance of small fish. These fish are not desired in the marketplace and harvesters and processors elected to leave them in the water to allow for additional growth. Reports from harvesters, tender operators and pilots strongly indicate that overall biomass in Sitka is very high, however the herring stuck close to the bottom and the larger fish did not separate from the older more marketable herring.

Criteria B: the agenda change request does not correct an error in regulation.

The proposers state that low subsistence and commercial fishery harvests in recent years require a reconsideration of the fishery. SHCA disagrees with assertions made through ACR 4 which suggest that the failure to harvest the 2018 and 2019 seasons' GHL in the Sitka Sound commercial herring fishery is indicative of biological concern for the fishery resource. Instead, it should be noted that much of the forecast biomass in 2018 and 2019 was below industry's minimum size threshold to satisfy market requirements, thereby making shortfalls in commercial harvest likely during both seasons. Early projections point towards a similar situation in 2020, when smaller three- and four-year old herring will predominate the Sitka Sound herring biomass. As the board knows, GHLS are a guideline by definition and design, and are not a guarantee for harvest.

Shortfalls in subsistence harvest can be largely attributed to the majority of spawning taking place along the shorelines of Kruzof Island, Hayward Strait, and the Siginaka Islands, and not in the islands closest to Sitka. It is undeniable that this abnormal distribution of herring spawn in Sitka Sound led to a reduction in the subsistence harvest of herring eggs in 2018 and 2019. However, as is the case with GHLS, amounts necessary for subsistence (ANS) are also guidelines that cannot be guaranteed through management or regulatory action.

There is reasonable opportunity to achieve the ANS in Sitka Sound, but there is not sufficient participation. Supporting evidence can be found in Holen et al. (2011) and Sill and Cunningham (2017), both of which attribute recent downturns in Sitka Sound subsistence herring harvests to a "...general decrease in the participation of the subsistence herring egg harvest over the last 12 years...". Gmelch et al. (1985) reported that, in 1985, subsistence herring egg harvest in Sitka

Sound was practiced by a small proportion of the community. Twenty-five years later, Holen et al. (2011) report that the number of harvesters has declined even further. Sill and Lemons (2017) report that several well-known elder “high harvesters” in the 1980s, 1990s and 2000s were commercial fishermen (sac roe and salmon) who harvested herring eggs for Sitka and outlying communities, and who have since either retired or have passed away. Despite such low participation, Sill and Cunningham (2017) report that since 2006 the amount necessary for subsistence (ANS) of herring spawn harvest was met in 2006, 2009, 2010, and 2014, and was close to being met in most other years. Holen et al. (2011) document a continued desire to receive herring eggs, although fewer and fewer households are participating in herring egg harvesting activities (Figure 1).

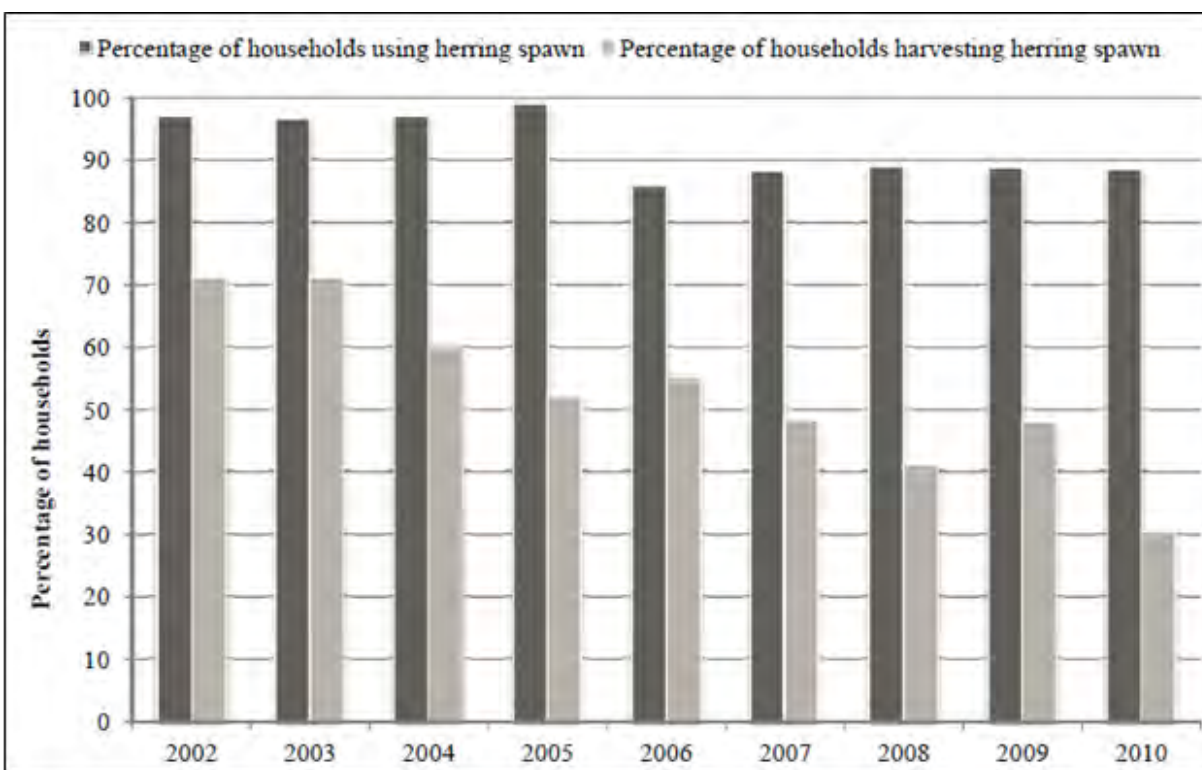


Figure 1.—Percentages of households harvesting and using herring spawn, 2002–2010 (from Holen et al. 2011).

A valid question, then, is whether expansion of the “Core Area” or any part of the Core Area was necessary to provide a reasonable opportunity for subsistence, as defined in AS 16.05.258(f). That term is defined as “...allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant a reasonable expectation of success....” Accordingly, SHCA asserts that reasonable opportunity is available every year. Based on ADF&G survey transects, heavy spawn densities have been documented at locations along and/or within several miles of the Sitka road system in most years of the past decade (ADF&G 2019; Appendix 8). According to Holen et al. (2011) the ANS guideline has been met six of the nine years documented in their report. In 2005, 2007, and 2008 when the lower ANS guideline was not reached, we argue that it was not due to lack of reasonable opportunity, but rather to reduced effort and participation, weather, and/or fuel costs, and a lack of transparency for



reported numbers. Further, we argue that spawn spatial distribution does have a role in success of harvest, as the herring do not spawn with the same intensity at all given locations every year. We believe that this was a factor in 2018 and 2019, when most meaningful herring spawn took place far from Sitka. Additionally, Holen et al. (2011) acknowledge further uncertainty surrounding ADF&G harvest reporting since ADF&G's methodology was changed in 2010. The report does not discuss what the overhaul in methodology means to previous subsistence harvest estimates, however. The change certainly begs validation of, or qualification of previous results. Much additional work needs to be done to develop a scientifically defensible and transparent methodology.

Criteria C: the agenda change request does not address an effect of regulation on a fishery that was unforeseen when the regulation was adopted.

For decades, each Southeast BOF cycle has seen multiple Sitka herring proposals that have received significant time and attention from the BOF, ADF&G, and the public. The most recent 2018 Southeast meeting was no exception, with herring proposals taking up a considerable amount of time at the meeting. In addition, the ACR process has frequently been used in an attempt to curtail Sitka herring harvest in recent years. Given that the issues brought forth in this proposal were considered during the 2018 BOF cycle and were also addressed at the 2018 BOF Work Session in the form of yet another ACR, this proposal should be addressed in the upcoming Southeast board cycle.

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

SHCA's work in 2008–2010 and 2012–2017 demonstrates that there is reasonable opportunity for subsistence harvest of herring eggs in Sitka Sound. Determining the total weight of herring eggs (measured weights) required to meet subsistence needs is a different question, but based on our work it appears to be closer to 50,000 pounds for Sitka (SHCA 2009).

In the decade preceding closure of the "Core Area," the department made a concerted effort to exclude commercial fisheries from the Core Area when possible, although it was not always possible. However, most openings in the recent history of the fishery were conducted outside of the Core Area based on ADF&G reporting. From 2002 to 2012, approximately 80% of the sac roe harvest was taken outside of the Core Area, with all harvest having occurred outside the closed Core Area since 2013. Regardless, the Core Area has had abundant spawn in most years. It is the one constant. In some years herring spawn in the Redoubt area or Deep Inlet but other years they do not; however, ADF&G (2018; Appendix 8) spawn maps show consistent spawn in the Core Area year after year, with 2018 and 2019 being notable exceptions. Certainly, there is variability in the spawn density but Kasiana, Middle, Crow, and a portion of the Sitka roadside consistently have annual spawn for most years.

Closing the Core Area was intended to diminish the commercial fishery and its harvest. The proposers claim that subsistence needs cannot be met with the current sac roe fishery management plan however there is good evidence to demonstrate otherwise.



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

If subsistence harvest information is used to curtail a fishery, then we believe this information needs to be transparent and verifiable, similar to commercial fishery harvest data. There is no information to support that subsistence opportunity has been diminished in recent years. To the contrary, given increasing stock abundance and review of spawn distribution, one can only conclude that subsistence opportunity has been greater in recent years than it has been since the department began managing the Sitka Sound herring stock in the 1970s when the biomass was ten percent of recent biomass estimates (ADF&G 2019; Appendix 8).

SHCA has been a partner in ensuring subsistence harvests.

Over ten years ago, it appeared to many as though effort by subsistence users to collect herring eggs had declined for a variety of reasons. Starting in 2008, groups and individuals have worked hard to help with ensuring that subsistence eggs could be harvested in Sitka and shared with others throughout Southeast Alaska. In 2008–2010 and again from 2012–2017 the herring fishermen, processors, tender operators, and community members got behind and assisted in a cooperative program to help meet this need. SHCA’s herring egg harvest data was supplied to ADF&G’s Subsistence Division each year and used in their analysis of Sitka Sound herring egg harvest. Through this work, SHCA demonstrated that there was reasonable opportunity prior to closure of the Core Area. SHCA members, some of whom are also traditional subsistence harvesters, have created partnerships that use their vessels to help assist with egg harvest. This effort helped bring eggs to the community of Sitka for distribution to subsistence users. **In early 2019, however, each herring permit holder received a letter from the Sitka Tribe of Alaska (STA) calling for the cessation of these efforts to supply eggs to the community.**

Coupling herring fishery management with regional Chinook salmon abundance is misleading.

Recent downturns in Chinook salmon abundance throughout the eastern Pacific Ocean have been well documented, although the causes for such declines have been difficult to identify until recently. According to Chasco et al. (2017), many marine mammal predators in the northeast Pacific Ocean have significantly increased in population in recent decades following federal protection from hunting and culling in Canada and the United States, thereby creating new and complex challenges for balancing human uses and salmon recovery goals. Chasco et al. (2017) estimate that marine mammal consumption of Chinook salmon increased from 5 million to 31.5 million individual salmon from 1975 to 2015, and in some cases now exceeds the combined harvest by recreational and commercial fisheries for Chinook salmon originating in central and northern California, Oregon, the Columbia River, the Salish Sea, and the Gulf of Alaska. Nelson et al. (2019) sought to assess the potential impacts of harbor seal predation on Chinook salmon in Washington State and British Columbia, where marine survival rates of many Chinook salmon stocks have experienced considerable declines since the 1970s. Concurrently, the population of harbor seals in southern British Columbia increased from a few thousand animals in the late 1960s to nearly 40,000 in 2008, with Puget Sound seal populations increasing sevenfold in the same time frame (Nelson et al. 2019). Nelson et al. (2019) found that the Chinook salmon



populations assessed in their study showed very high probabilities of a significant negative relationship between seal densities and Chinook salmon productivity and assert that seal predation on both juvenile and adult Chinook from coastal stocks in the Pacific Northwest is a growing concern for the species' recovery in that region. Finally, Seitz et al. (2019) utilized satellite tagging data to uncover evidence of predation on large immature Chinook salmon by salmon sharks in the Bering Sea and Gulf of Alaska, suggesting that late juvenile stage mortality by marine apex predators may be shaping the species' demographics and abundance in Alaska, or lack thereof.

Arguing that herring are needed to support Chinook salmon stocks in light of this compelling and complex evidence is far too simplistic, in our opinion. We argue that ACR 4 makes a blanket statement about the importance of herring in the diets of fish, seabird, marine mammals and Chinook salmon without any supporting evidence, and encourage further exploration of this issue by board members.

Potential impacts of ACR 4.

There is no biological basis for implementing the fishery restrictions and reductions and we believe that ACR 4 will have no effect on the subsistence harvest while compromising the opportunities for commercial harvest. The board has rigorously reviewed the same or similar proposals at every in-cycle meeting since the mid-nineties and most recently at the January 2018 BOF meeting in Sitka. Consequently, there is no pressing need to re-review the fishery out of cycle through an agenda change request. ADF&G has been meticulous in seeking outside consultants and experts to review its age-structured assessment (ASA) model, including University of Alaska professor Ted Cooney and a recent Ph.D. candidate at University of Washington. In fact, in 2011 Canada's Department of Fisheries and Oceans (DFO) invited ADF&G staff to participate in a two-day workshop with DFO modelers and biologists, and to meet with modeling experts from the University of Washington (Dr. Andre Punt) and University of British Columbia (Dr. Steve Martell) in Nanaimo, B.C. (per. comm. Dr. Sherri Dressel). The scope of the workshop included model functions, inputs, outputs, mortality factors, review of precautionary approaches, and many esoteric modeling factors. The Canadian herring model was reviewed, and frequent questions were asked of the Alaska team to bore into model criteria. Based on the review it is apparent to SHCA that ADF&G is doing its due diligence to keep abreast of the latest modeling recommendations and science.

SHCA asserts that ACR 4's underlying arguments stand to unnecessarily harm the commercial fishery and those associated with it. This would include the communities of Sitka, Petersburg, Craig, Kake, Craig, Hydaburg, and Ketchikan; permit holders, crew members, tender operators and crews, processors, pilots and associated service providers. SHCA strongly recommends that the board take no action on this proposal and instead encourages all fishery participants to continue with their cooperative and collaborative efforts as previously outlined in RCs 379 (Appendix/Attachment 1) and 380 (Appendix/Attachment 2) from the board's January 2018 Southeast and Yakutat Finfish and Shellfish meeting. Appendices/attachments 3 through 6 highlight local (Sitka) opportunities for collaboration between industry and Sitka Tribe of Alaska herring fishery stakeholders, should fishery participants wish to pursue more constructive dialogue.

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

Sincerely,

Chip Treinen
President, SHCA



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SOUTHEAST HERRING CONSERVATION ALLIANCE



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

January 20, 2018

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

Dear Chairman Jensen and Alaska Board of Fisheries Members:

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

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

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

DRAFT Sitka subsistence-commercial herring action plan

Industry support of subsistence herring egg harvest

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

Workforce development

- Collaboration between UAS-FT, SSD, SSSC, STA, and SHCA to develop and prosecute high school and undergraduate curricula dedicated to traditional foods, highlighting collaboration among commercial and subsistence users (includes application and contributions of aquaculture and mariculture);

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

Improved community relations through collaborative educational/social event

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

Sincerely,



Steve Reifensstuhl
Executive Director SHCA

SOUTHEAST HERRING CONSERVATION ALLIANCE



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

January 20, 2018

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

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

Concept of agreement

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

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

Sincerely,

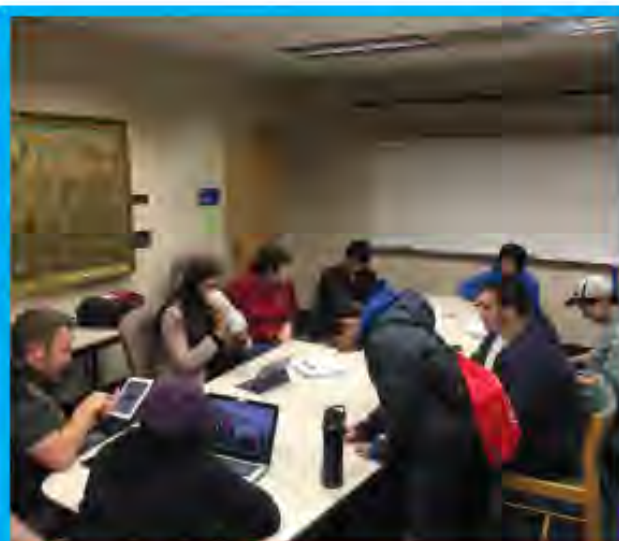


Steve Reifenstuhel & John Carle ANITA
Executive Director SHCA



Fisheries Technology Newsletter

SITKA CAMPUS UPDATES, FALL 2017



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

(Photo provided by Ana Christine Tiayofa.)

Industry and Native organizations promote fisheries education for high school students

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



9/30/2018

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



UAS Fish Tech

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

[fishtech](#) • June 28, 2018 • Alaska, News, UAS, Uncategorized

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



UNIVERSITY of ALASKA SOUTHEAST

Salmon Culture Semester

A Hands-On Learning Experience

Spring 2019 (January 14 - May 3)

Salmon Culture Semester Core (13 Credits)

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

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

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

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

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

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

Fisheries Technology 291: Fisheries Technology Internship (3 Cr)

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

Fisheries Technology 193: Cold Water Survival (1 Cr)

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

Marine Transportation 119: Small Vessel Operator (1 Cr)

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

Marine Transportation 120: Outboard Motor Maintenance (1 Cr)

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

Enrollment is open until filled, for 20 participants maximum.
October 15, 2018 is the deadline for priority consideration.
The University of Alaska Southeast has been accredited by the Northwest
Commission on Colleges and Universities since 1983.
UAS is an AA/BO employer and educational institution.

For more information, contact:

Dr. Reid Brewer
rbrewer@alaska.edu
907-747-7799

Or visit www.divesemester.alaska.edu



AFS Alaska Chapter Annual Meeting 2019 Sitka, AK March 19 - 21

Location: Sitka, AK
Dates: March 19-21, 2019

*Continuing Education: March 18

*Field Trips: March 22



Save The Date!

American Fisheries Society Alaska Chapter Annual Meeting 2019

Location: Sitka, AK

Dates: March 19-21, 2019

*Continuing Education: March 18

* Field Trips: March 22

Call for Symposia coming soon

Call for Abstracts shortly after



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES NEWS RELEASE



*Doug Vincent-Long, Commissioner
Sam Rabung, Director*



Contact:
Eric Coonradt

Sitka Area Office
304 Lake Street, Room 103
Sitka, Alaska 99835

Phone: (907) 747-6688

Date: May 17, 2019

Fax: (907) 747-6693

Time: 2:45 p.m.

SITKA SOUND SAC ROE HERRING FISHERY ANNOUNCEMENT

Sitka... The Alaska Department of Fish and Game has mapped 55.8 nautical miles (nmi) of herring spawn in 2019 from March 24 through April 13 (Figure 1). The spawn deposition survey was conducted on April 12-15. Final results from this year's stock assessment will not be available until November 2019, however some general information can be derived from the data collected to date.

Nearly all of the herring spawn for 2019 occurred along the shorelines of Kruzof Island, Hayward Strait, the Magoun Islands, Promisla Bay, and Eastern Bay (Figure 1). Little herring spawn was observed in the islands near Sitka, which typically receive substantial spawn. The lack of spawn in the islands near Sitka also occurred in 2018 and is historically unusual. The estimate of 55.8 nmi of herring spawn is slightly less than the long-term (1999-2018) average spawn mileage of 59.6 nmi. While the 2019 spawn mileage estimate was below average, preliminary results of the spawn deposition survey revealed that the offshore width and density of herring spawn were greater than average. This was especially true of the spawn on the Kruzof Island shoreline. In 2005, 2008, and 2018, a similar situation occurred where the spawn extended far offshore on Kruzof Island due to the very wide shelf of herring spawning habitat.

No commercial herring sac roe fishing occurred in 2019. Although herring were available to the fishery, fish meeting market requirements were not found despite extensive vessel and aerial surveys conducted between March 17 and March 27.

In 2018, 33.1 nmi of herring spawn was mapped; peak spawn occurred on April 12 and the last spawn was observed on April 29. The 2018 model estimated post fishery biomass was 56,248 tons.

News releases web site: <http://www.adfg.alaska.gov/index.cfm?adfg=cfnews.main>

Office	Kenai	Petersburg	Wrangell	Sitka	Juneau	Haines	Hoonah	Yakutat
ADFG	225-5195	772-3801	874-3522	747-6688	465-4250	766-2830		784-3255
AWT	225-5111	772-3983	874-3215	747-3254	465-4000	766-2533	945-3620	784-3220

Sitka Herring NR

page 1 of 2

May 17, 2019



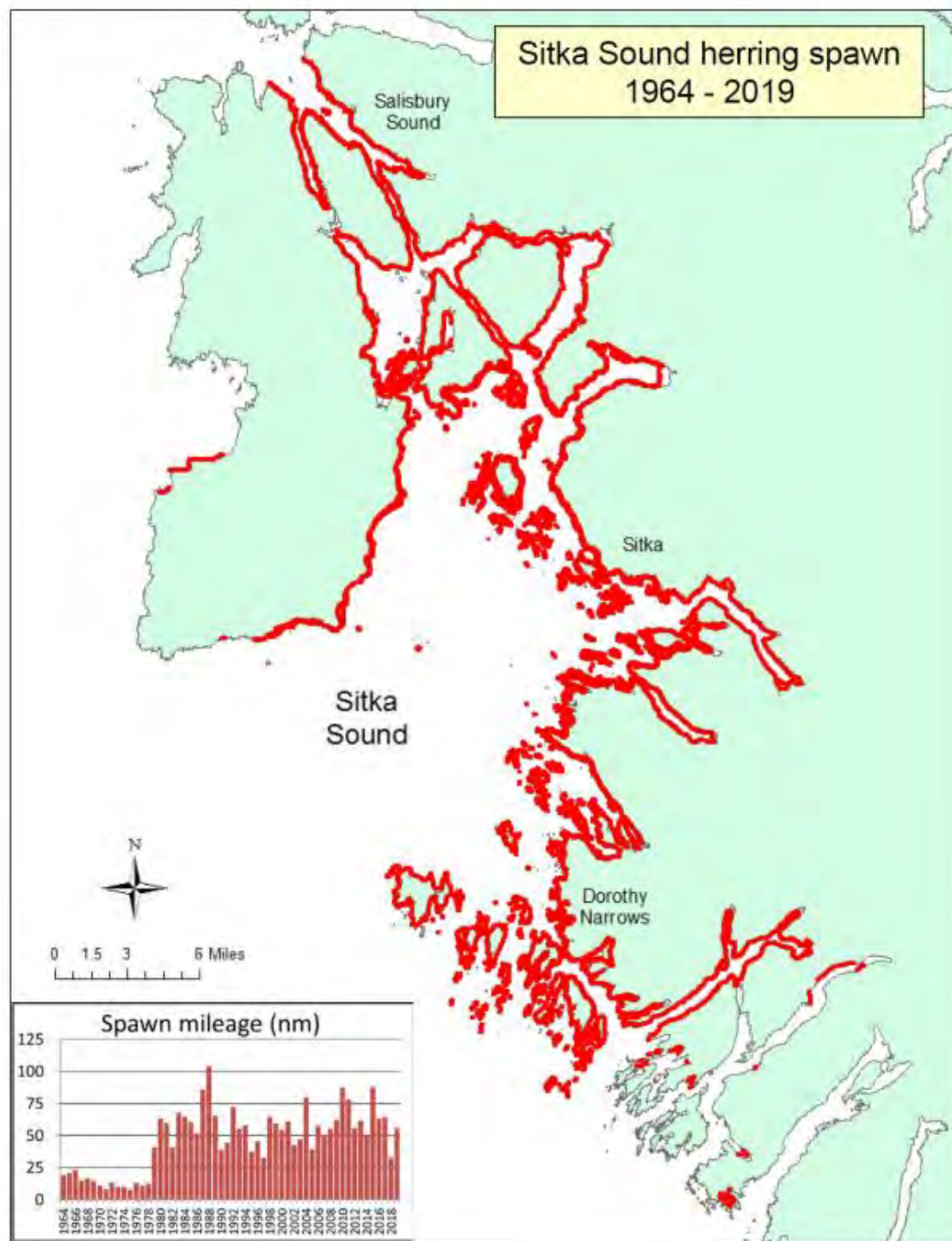
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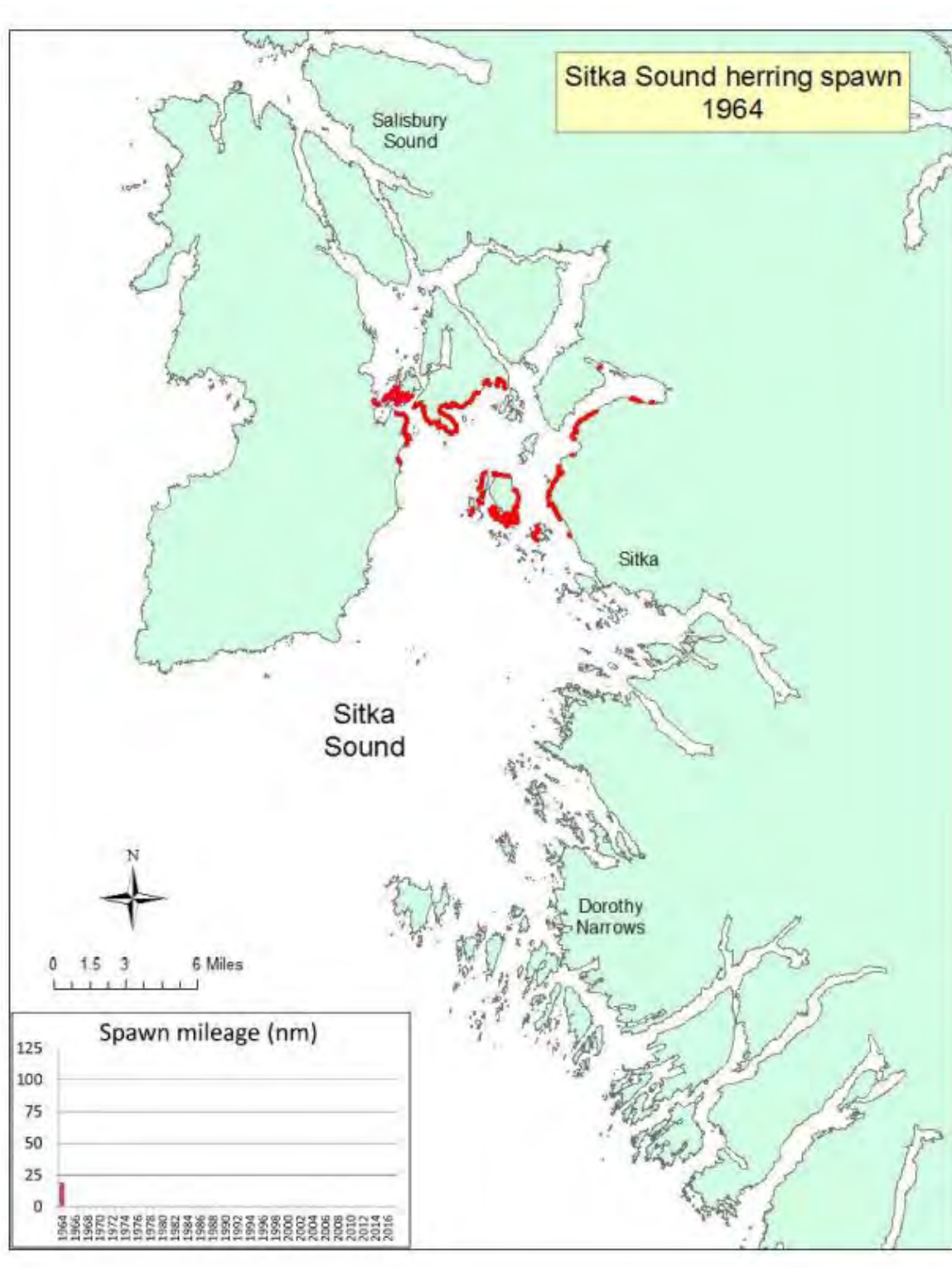
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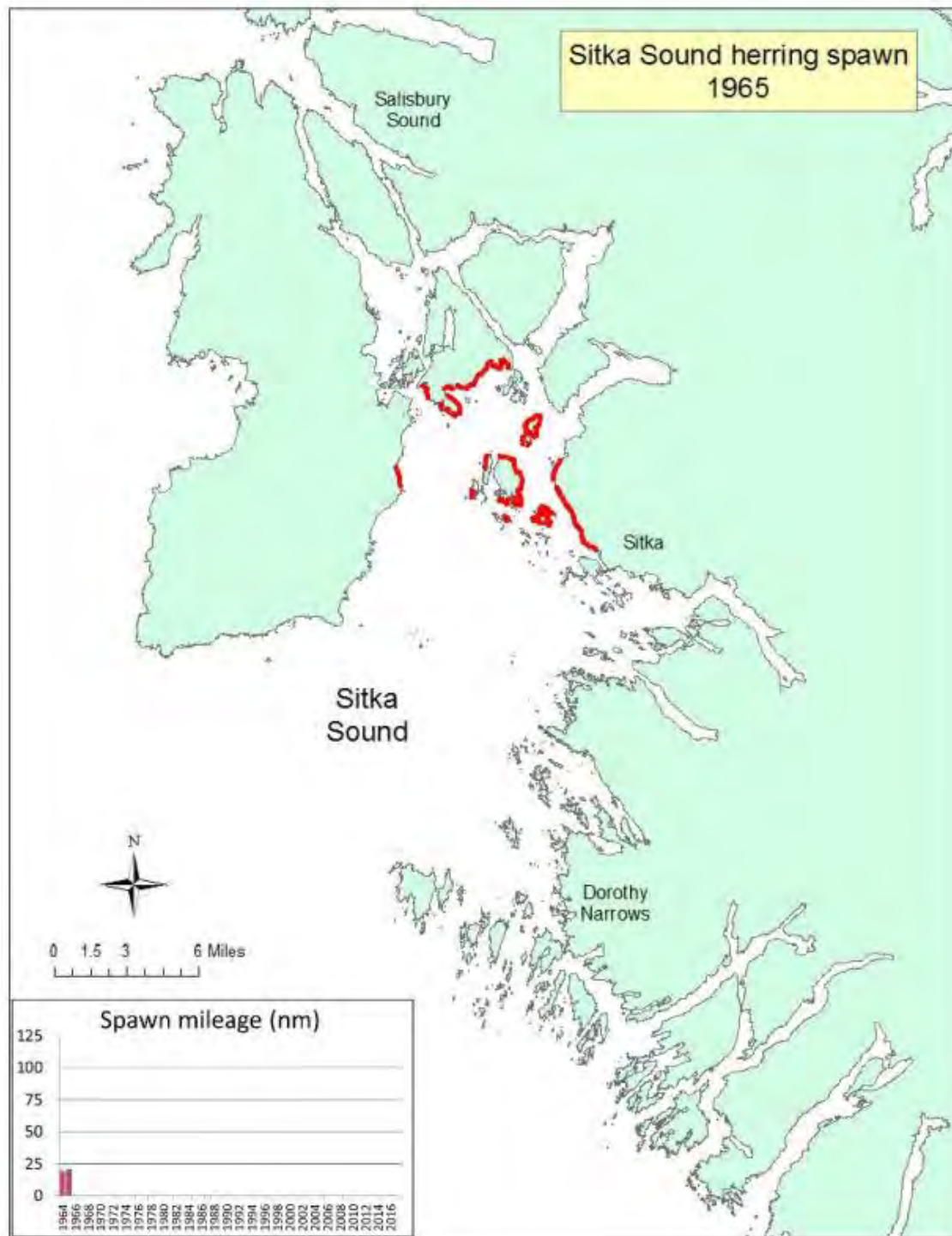
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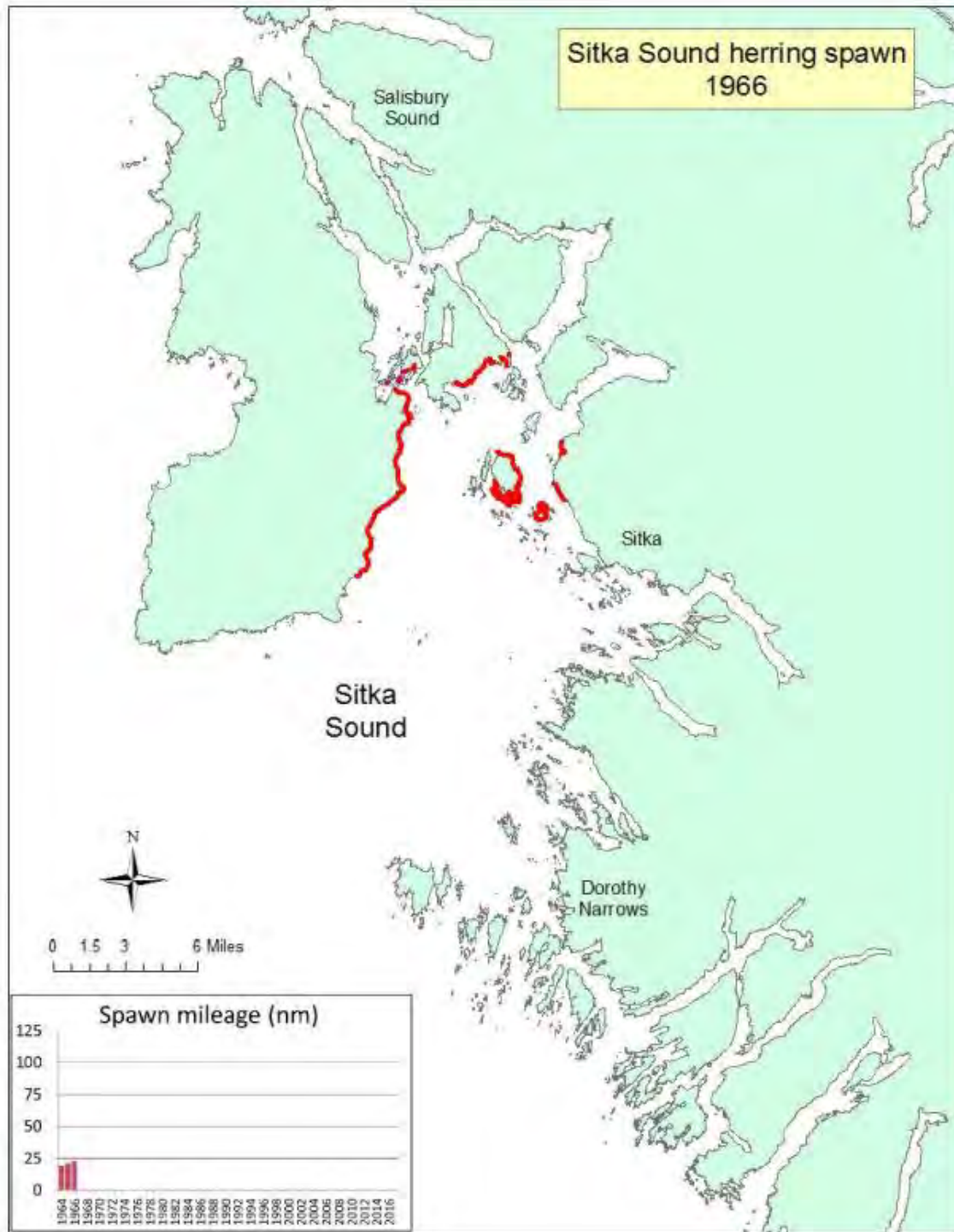


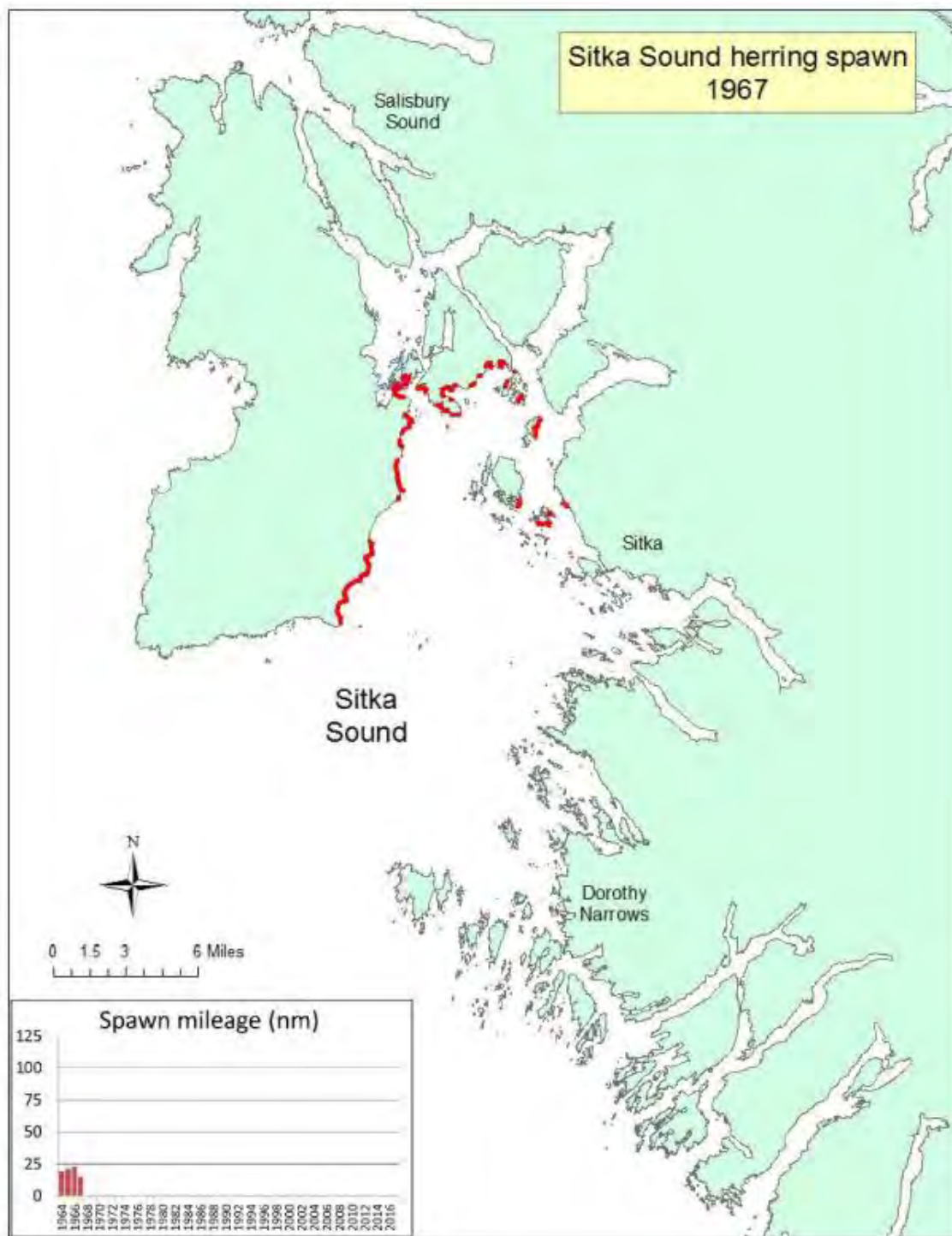
Figure 1. 2019 Sitka Sound herring spawn.

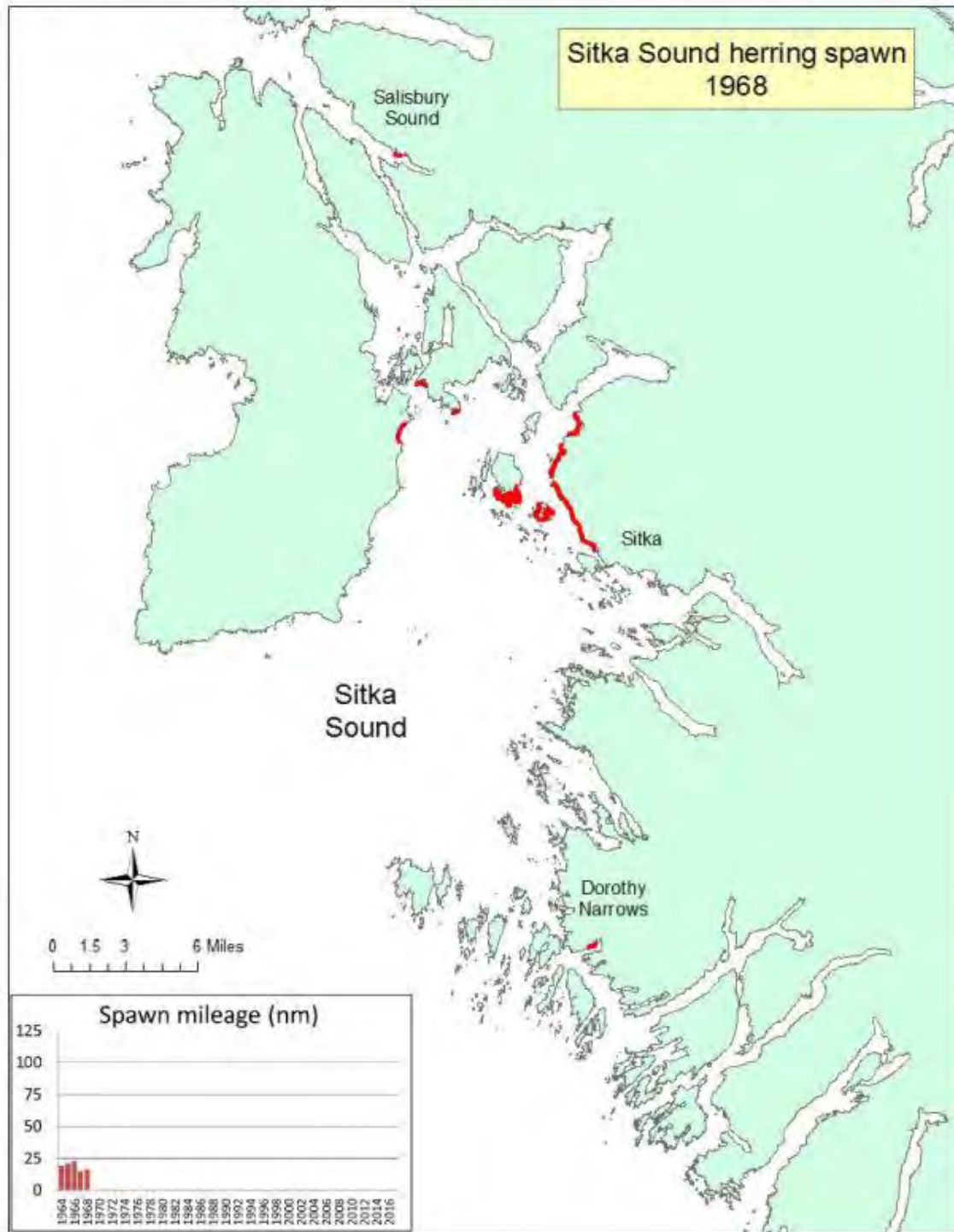


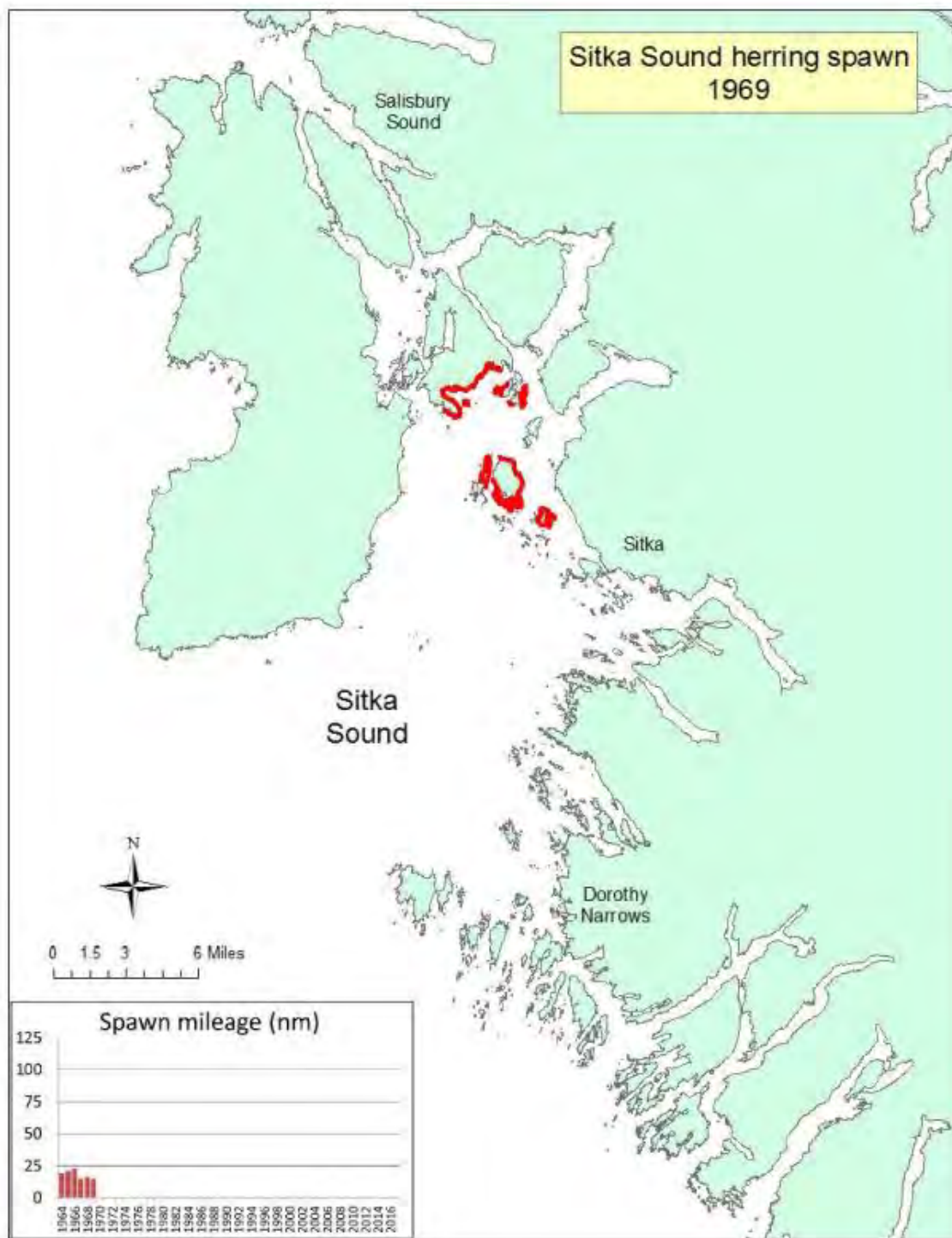


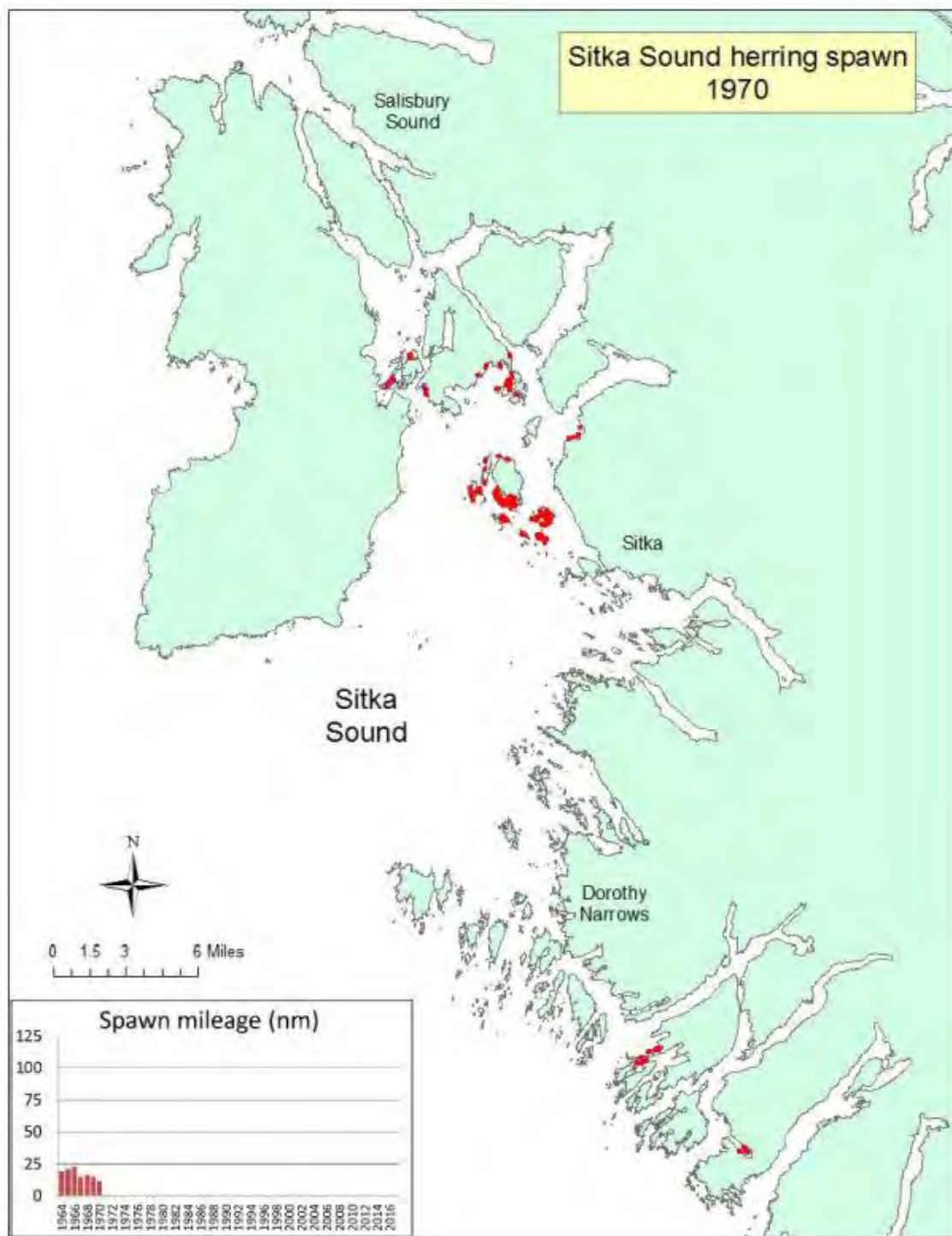


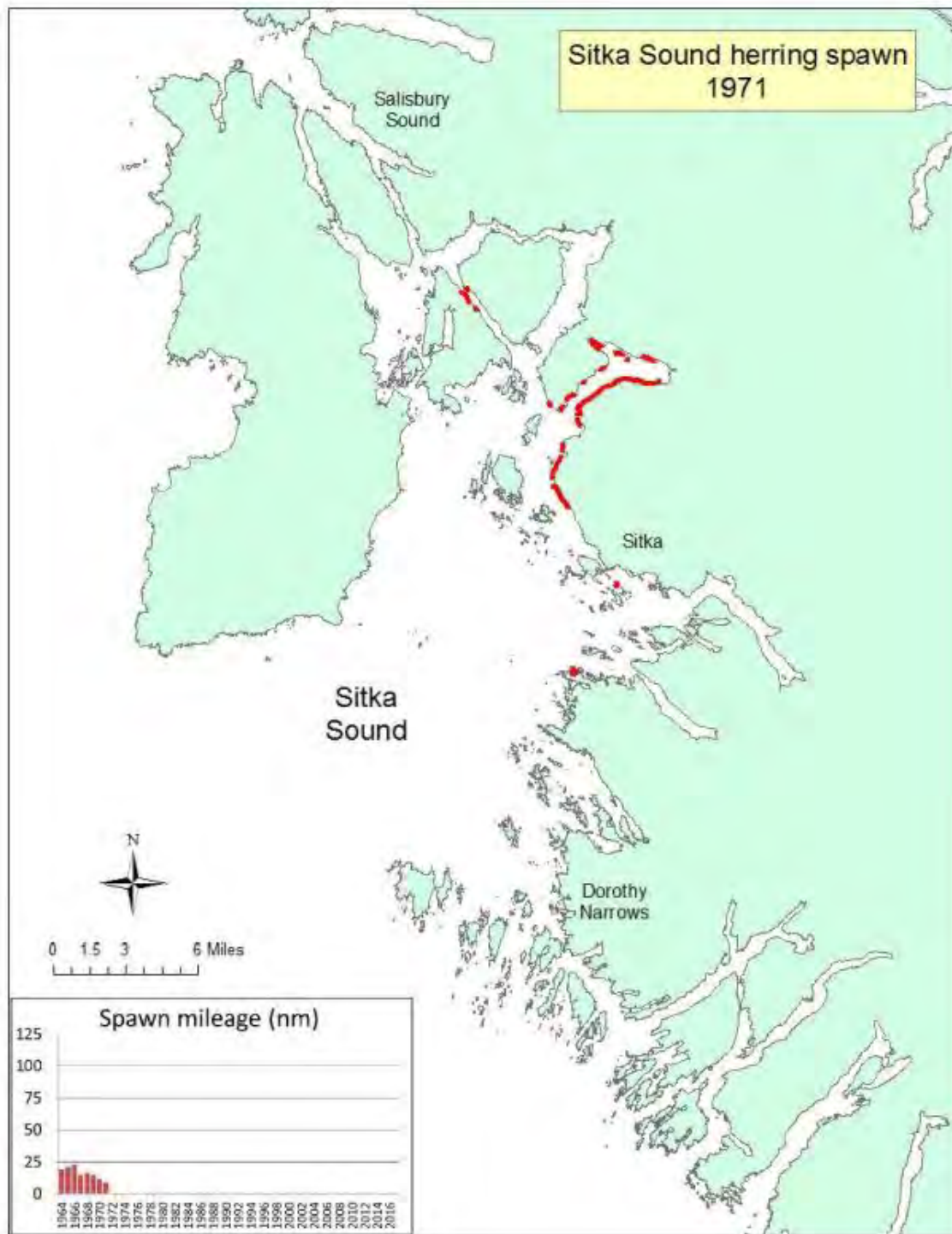


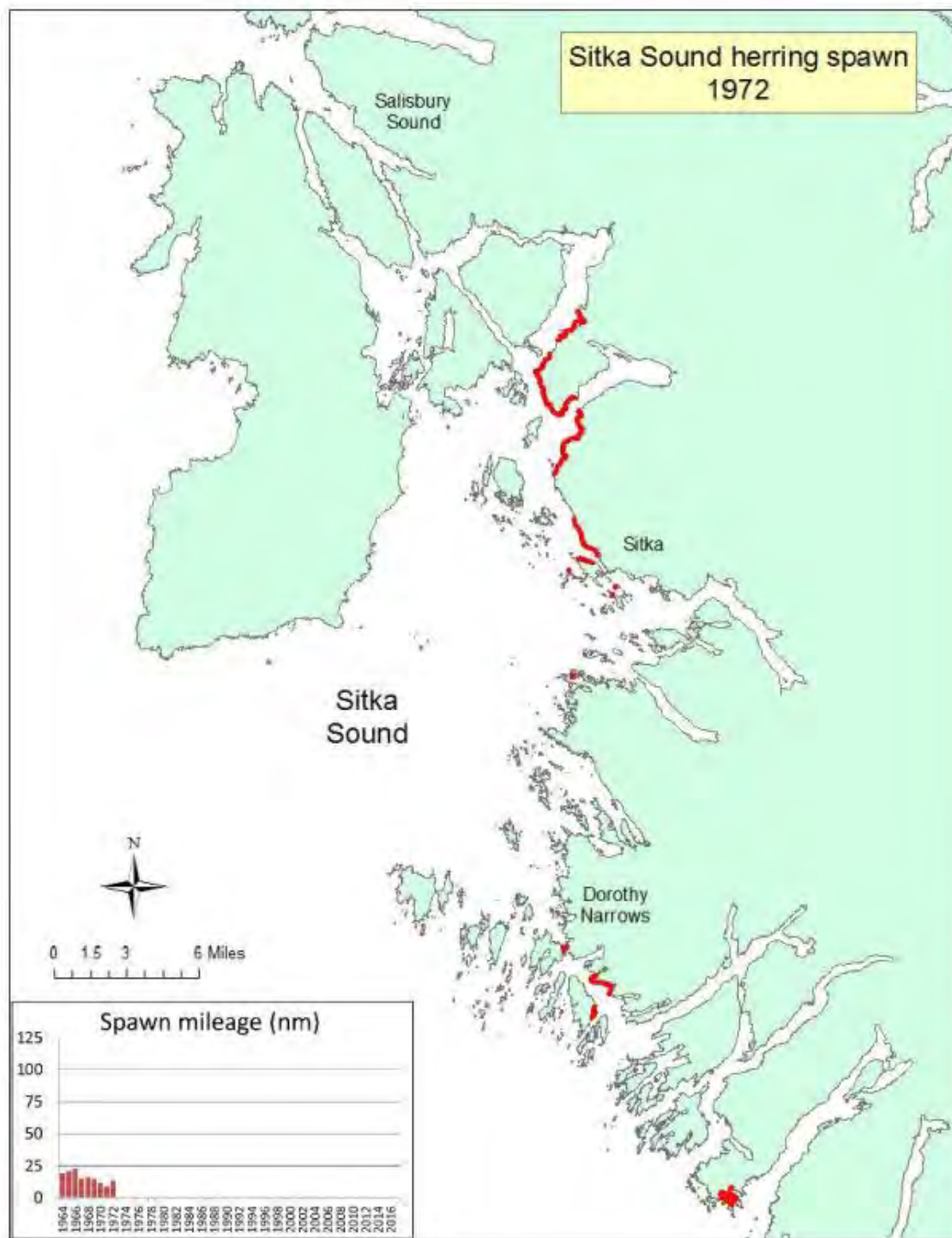


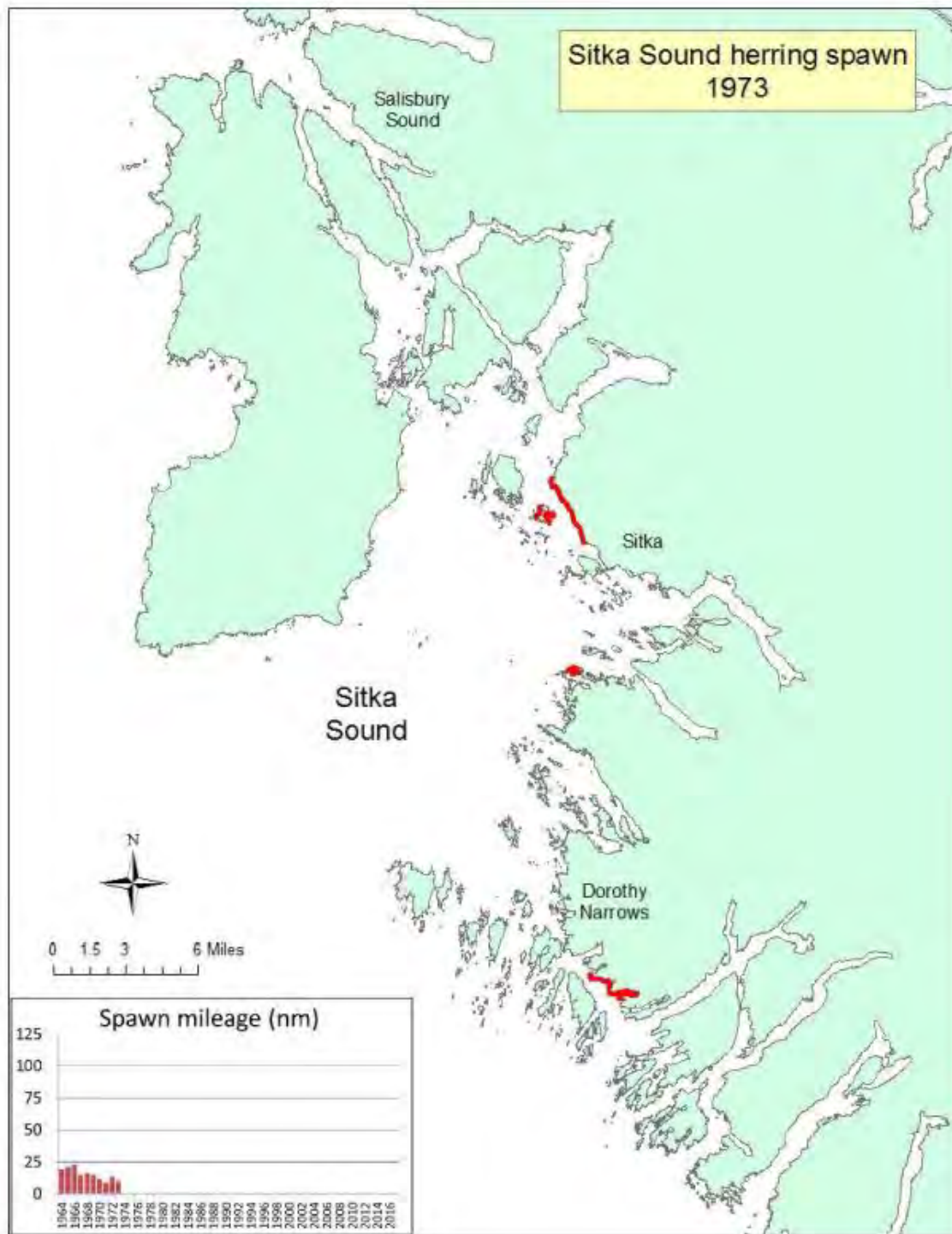


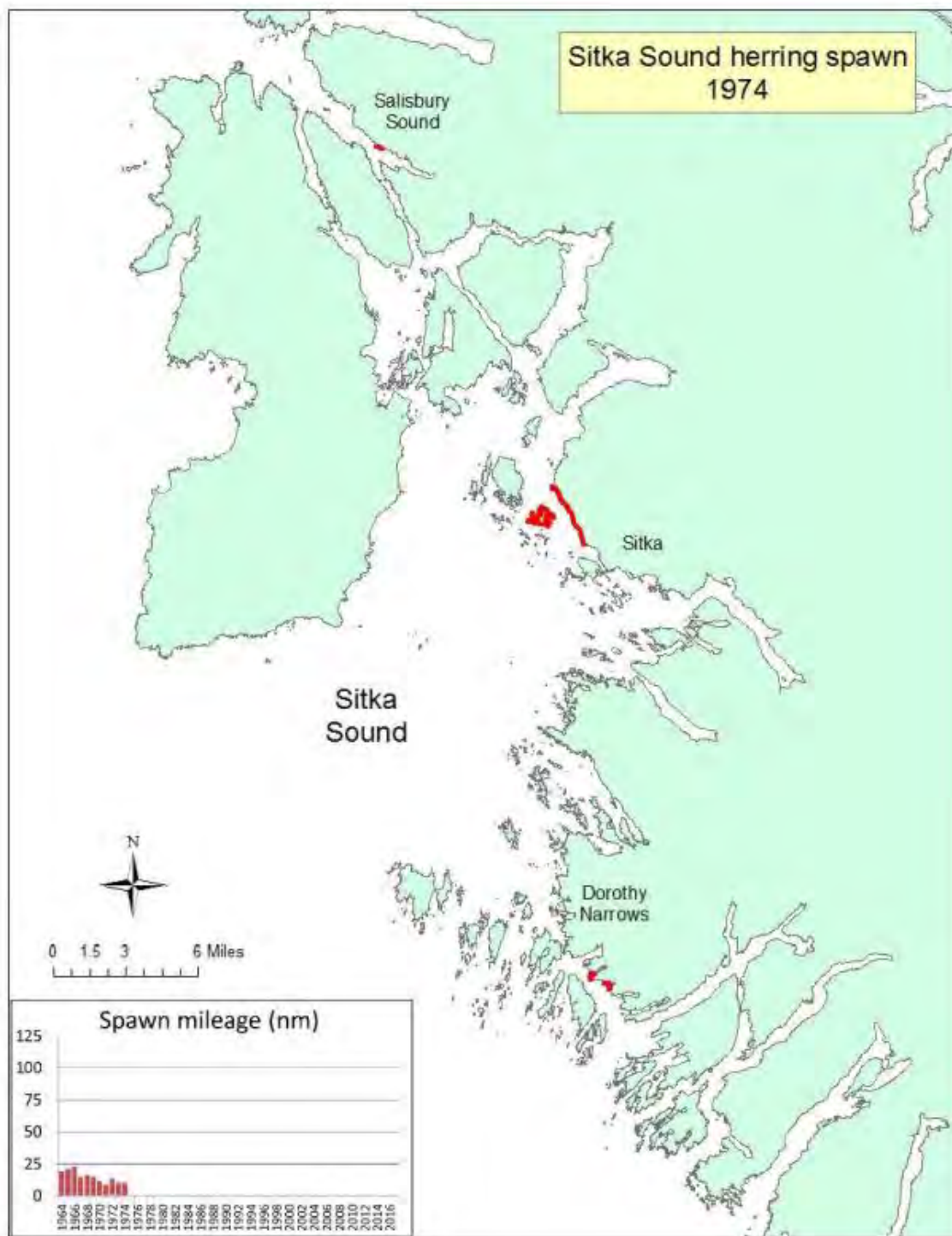




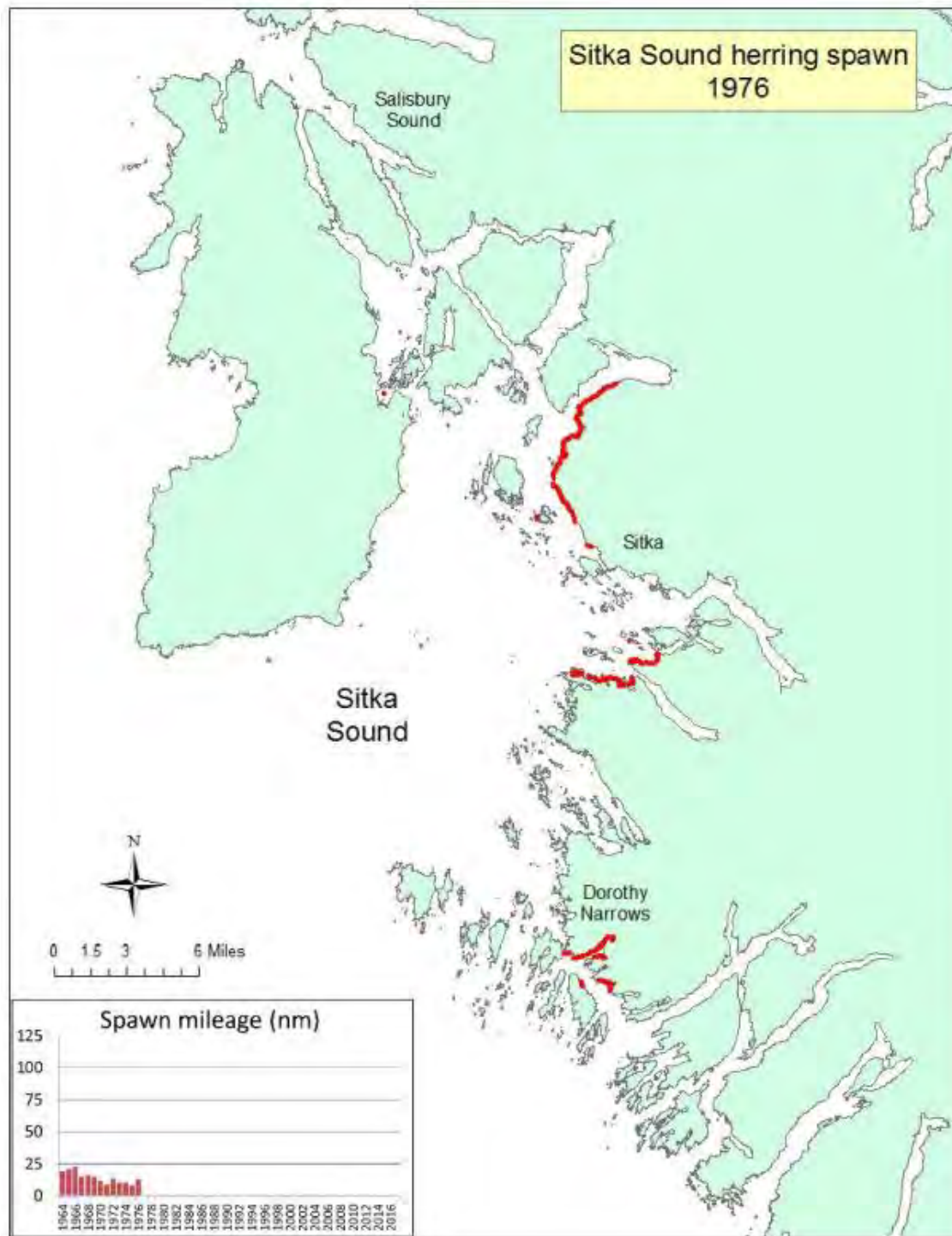


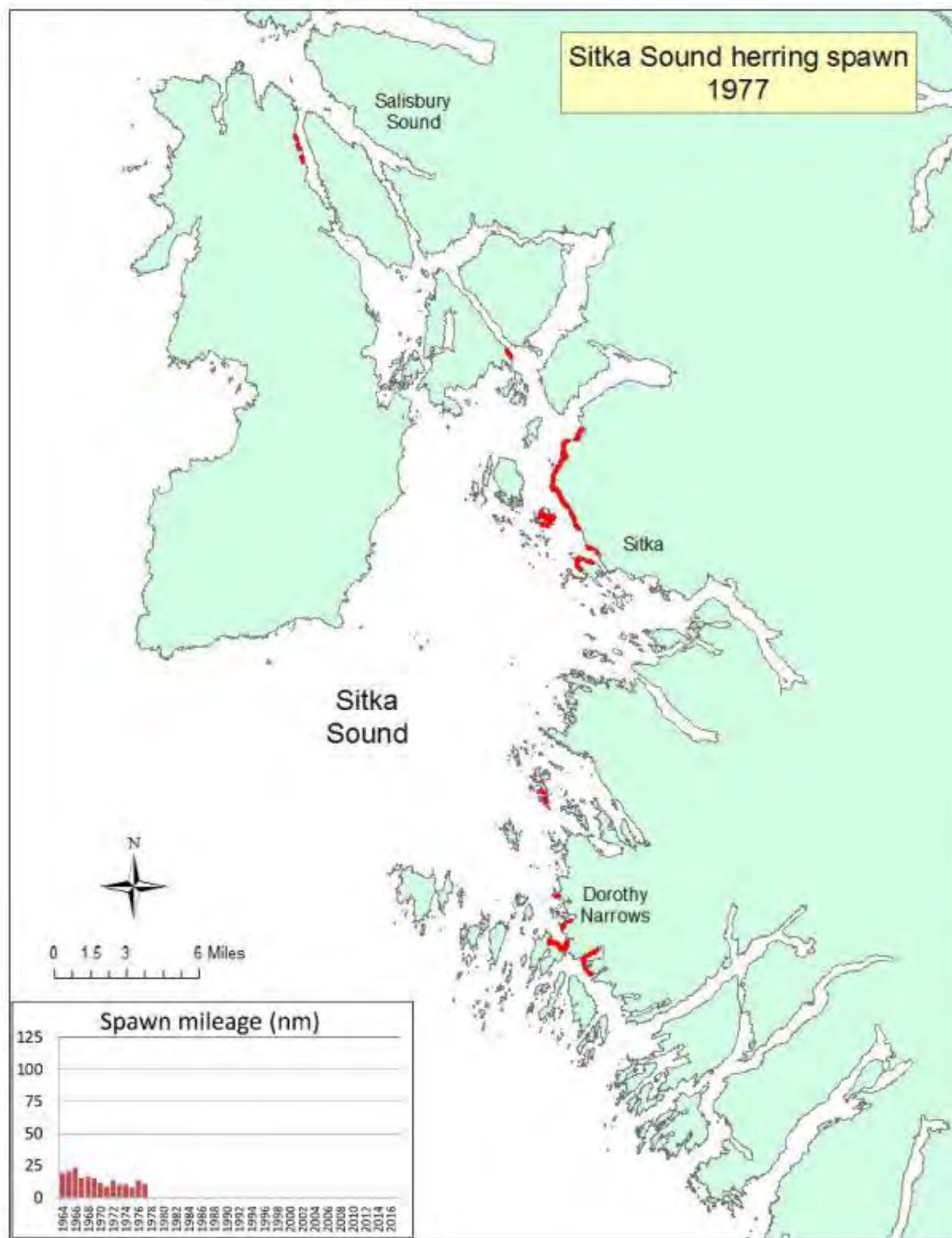


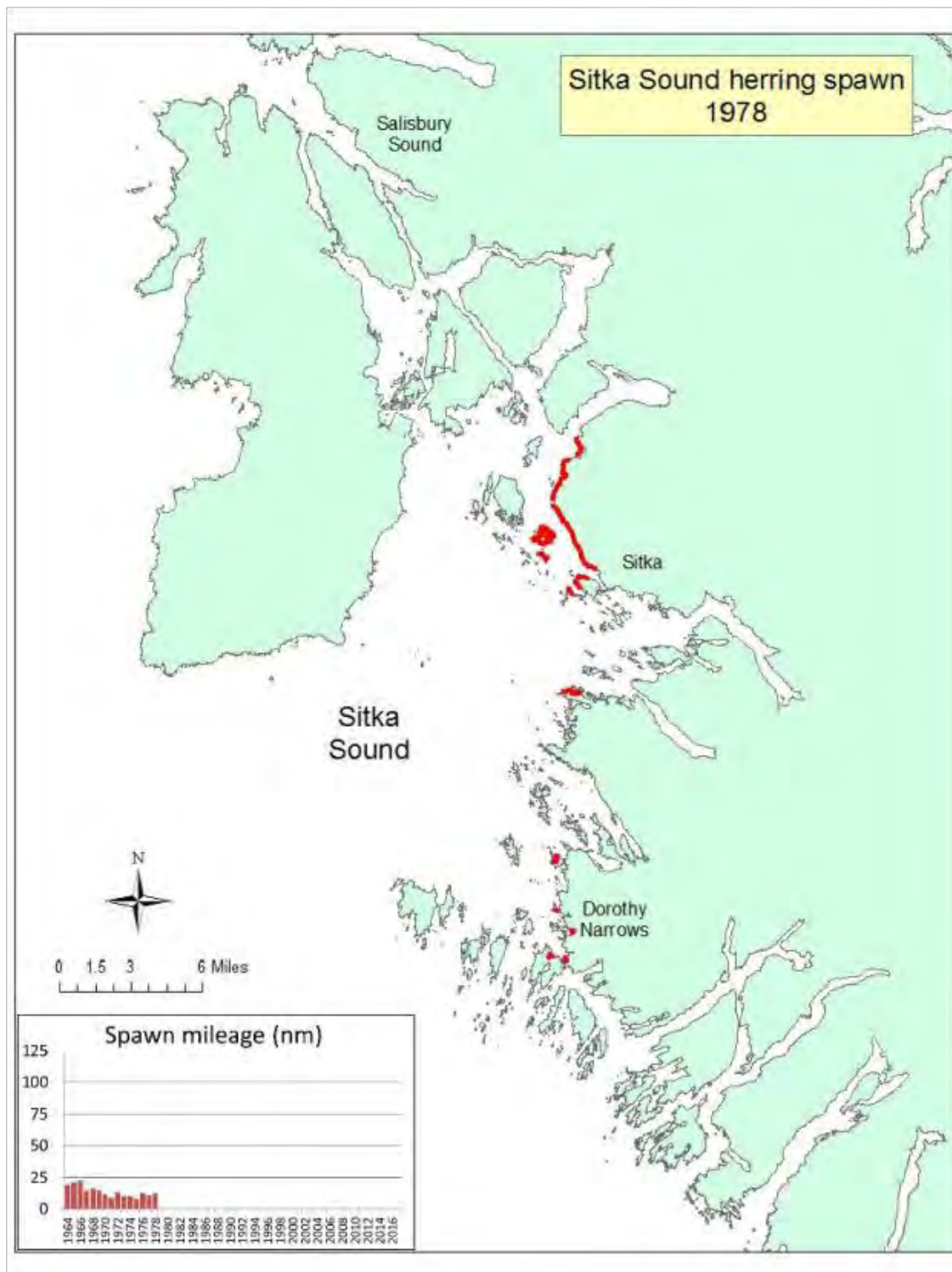


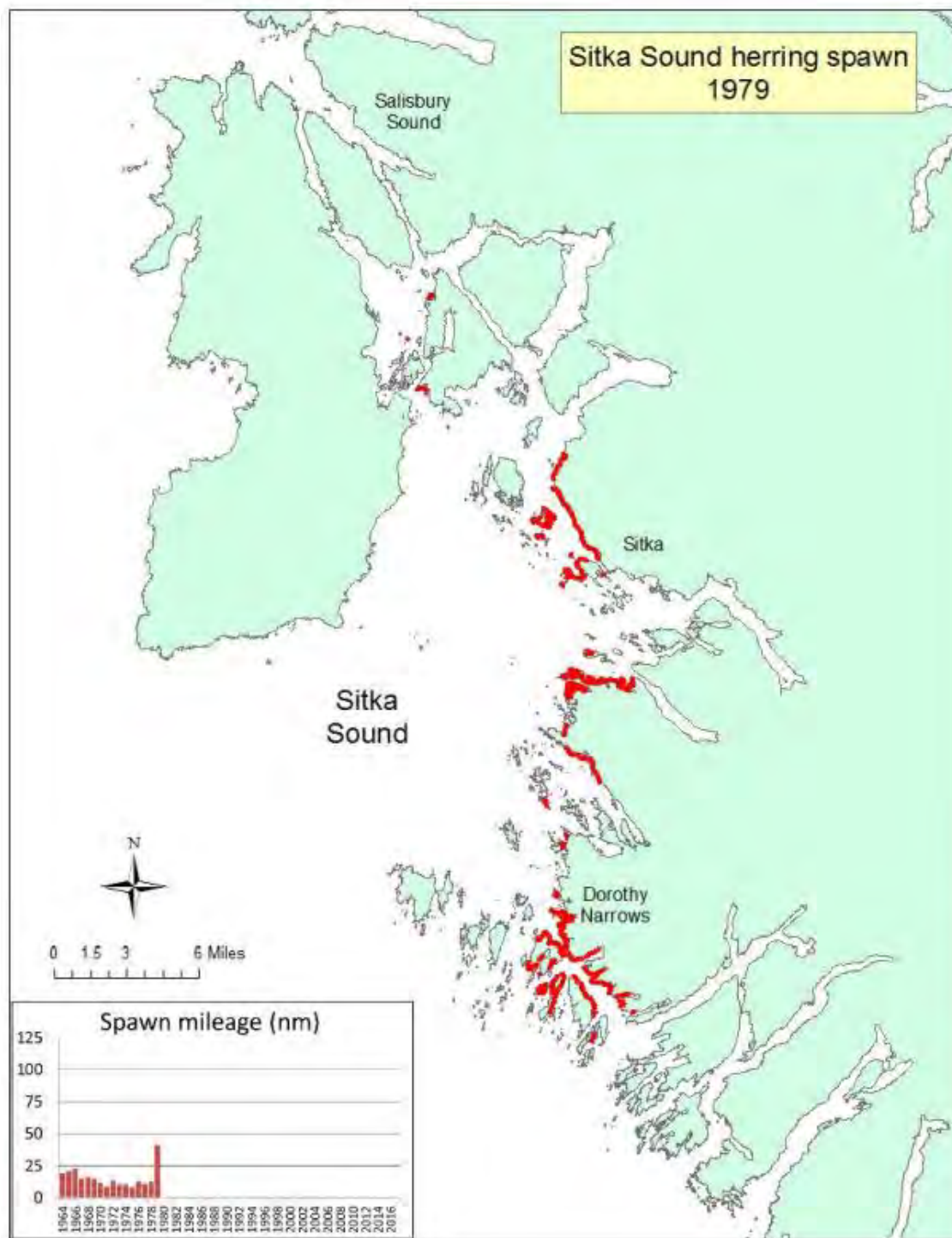


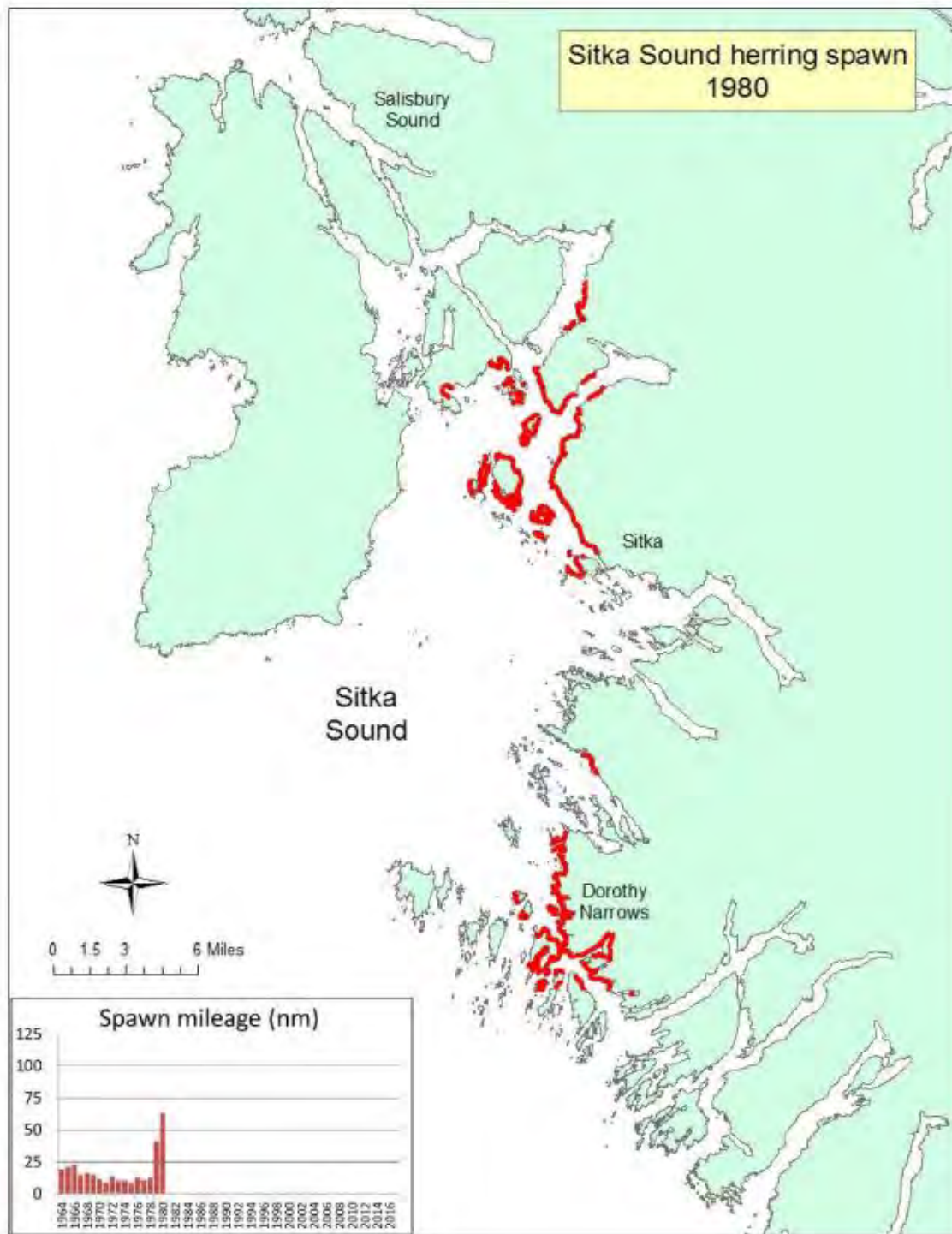


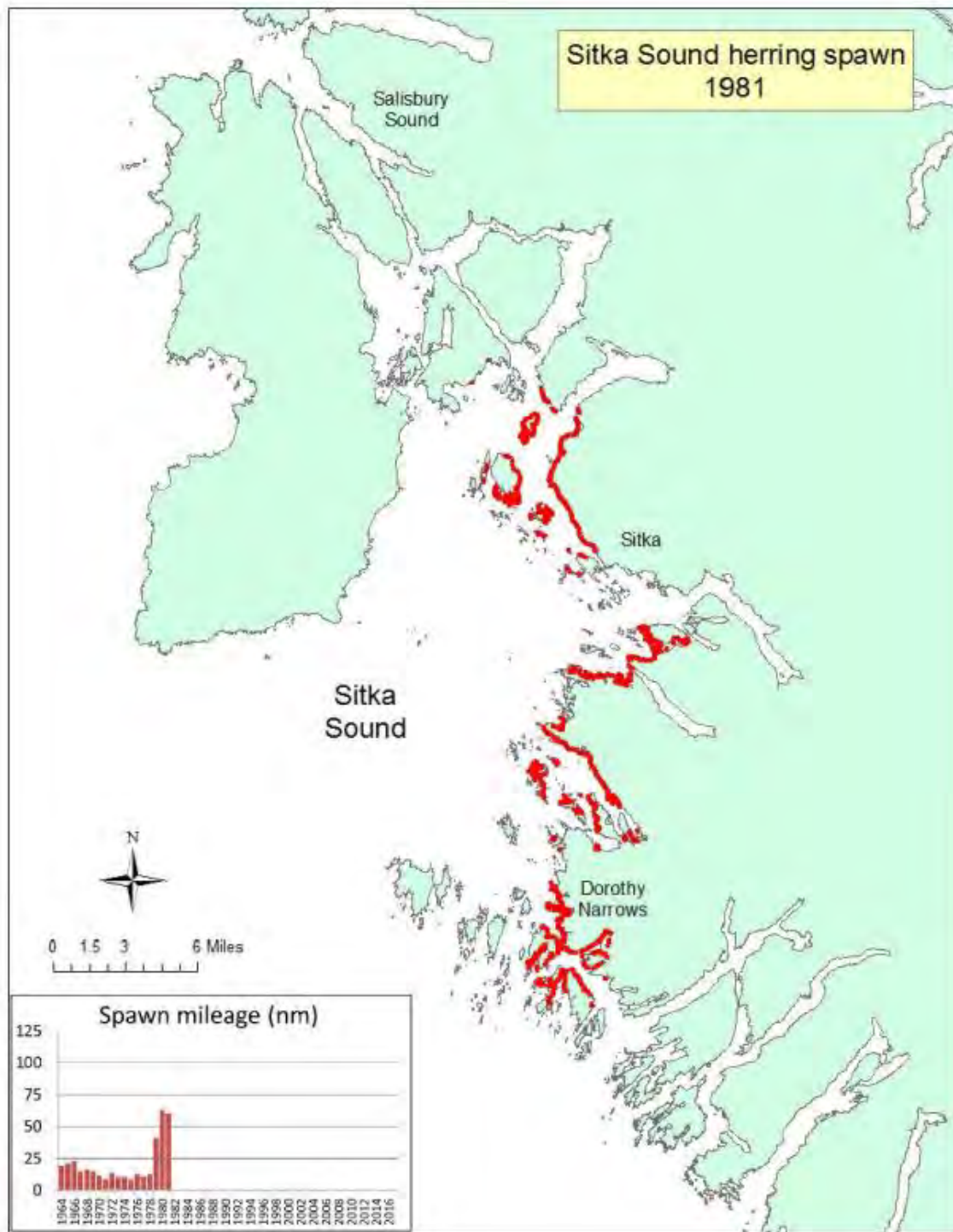


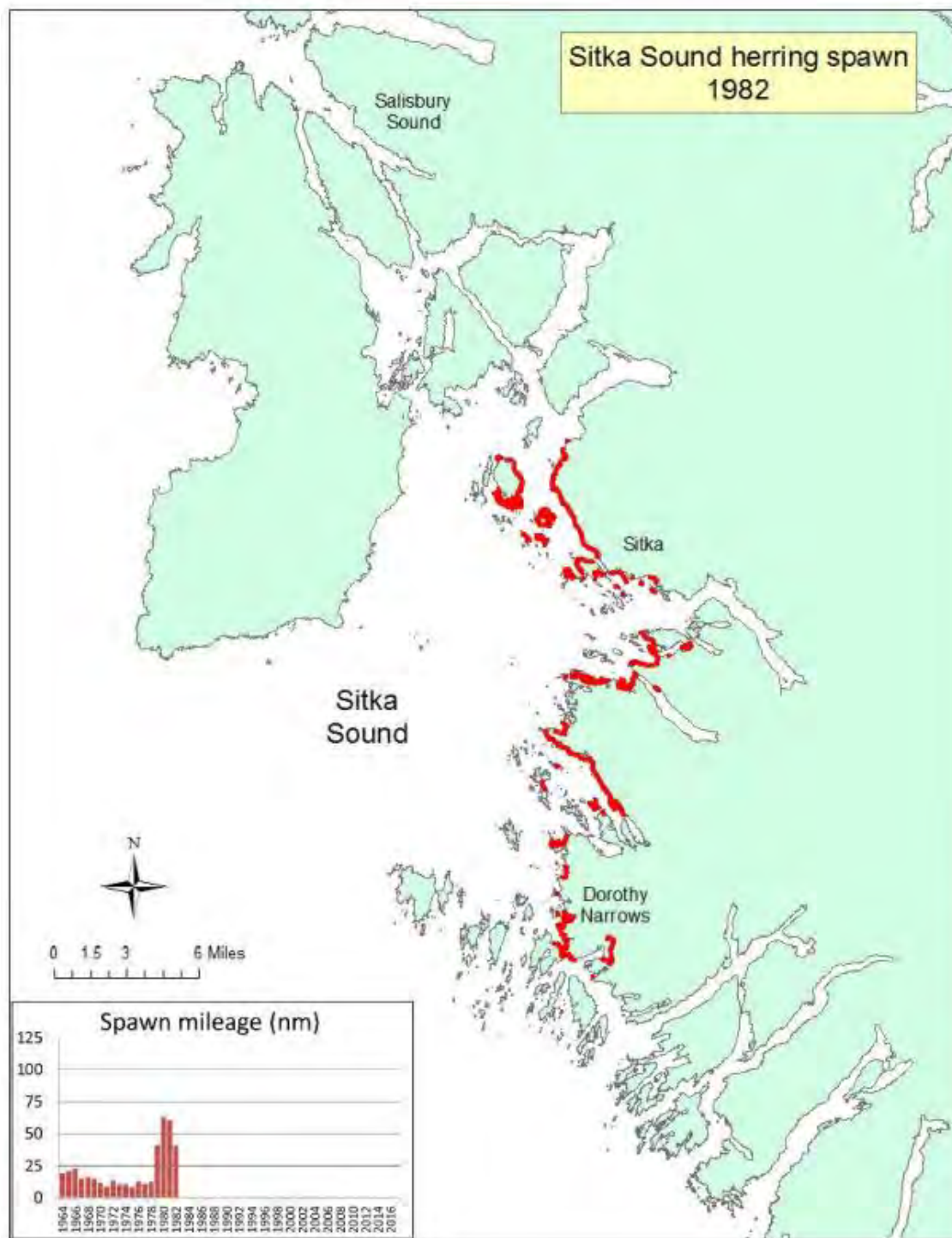


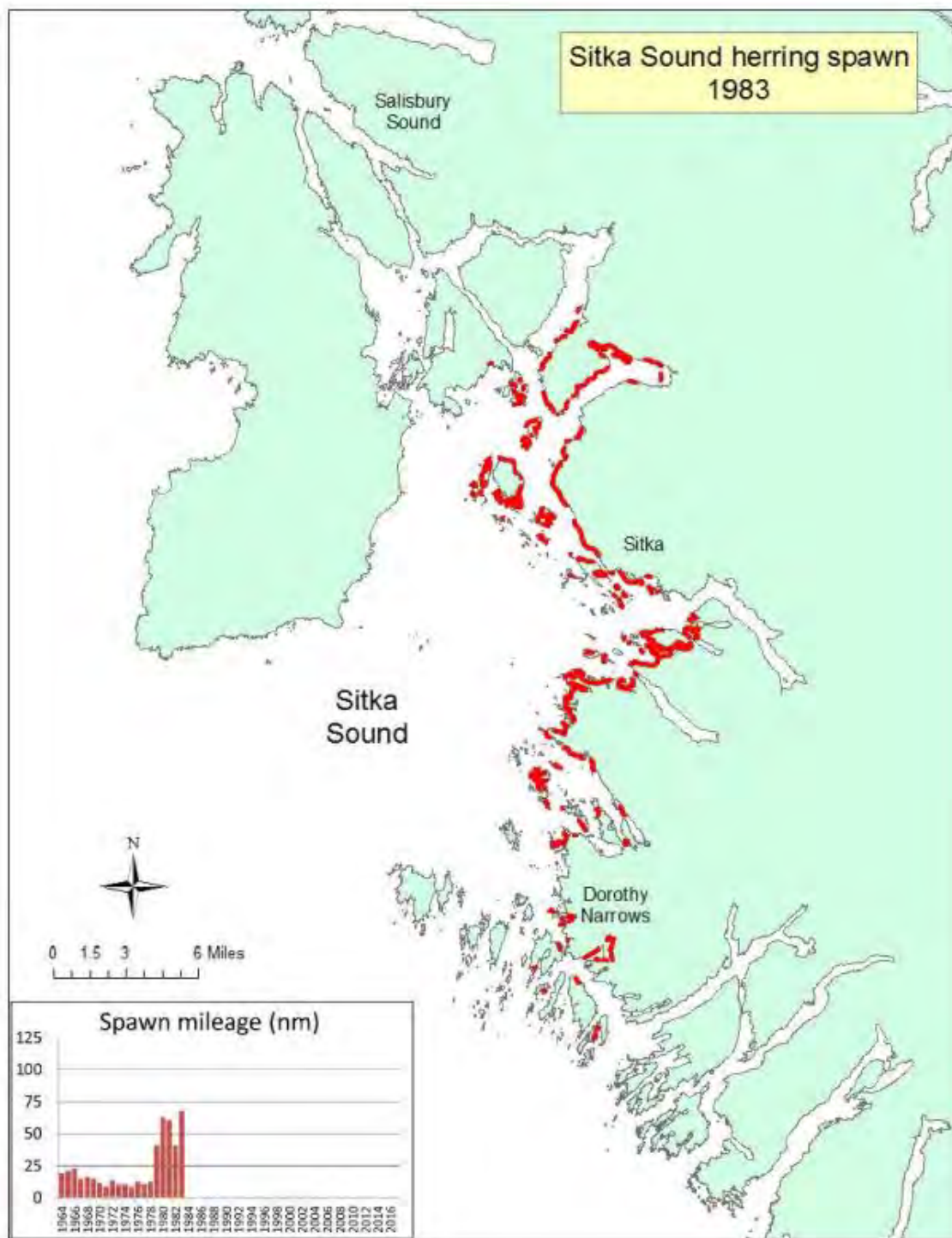


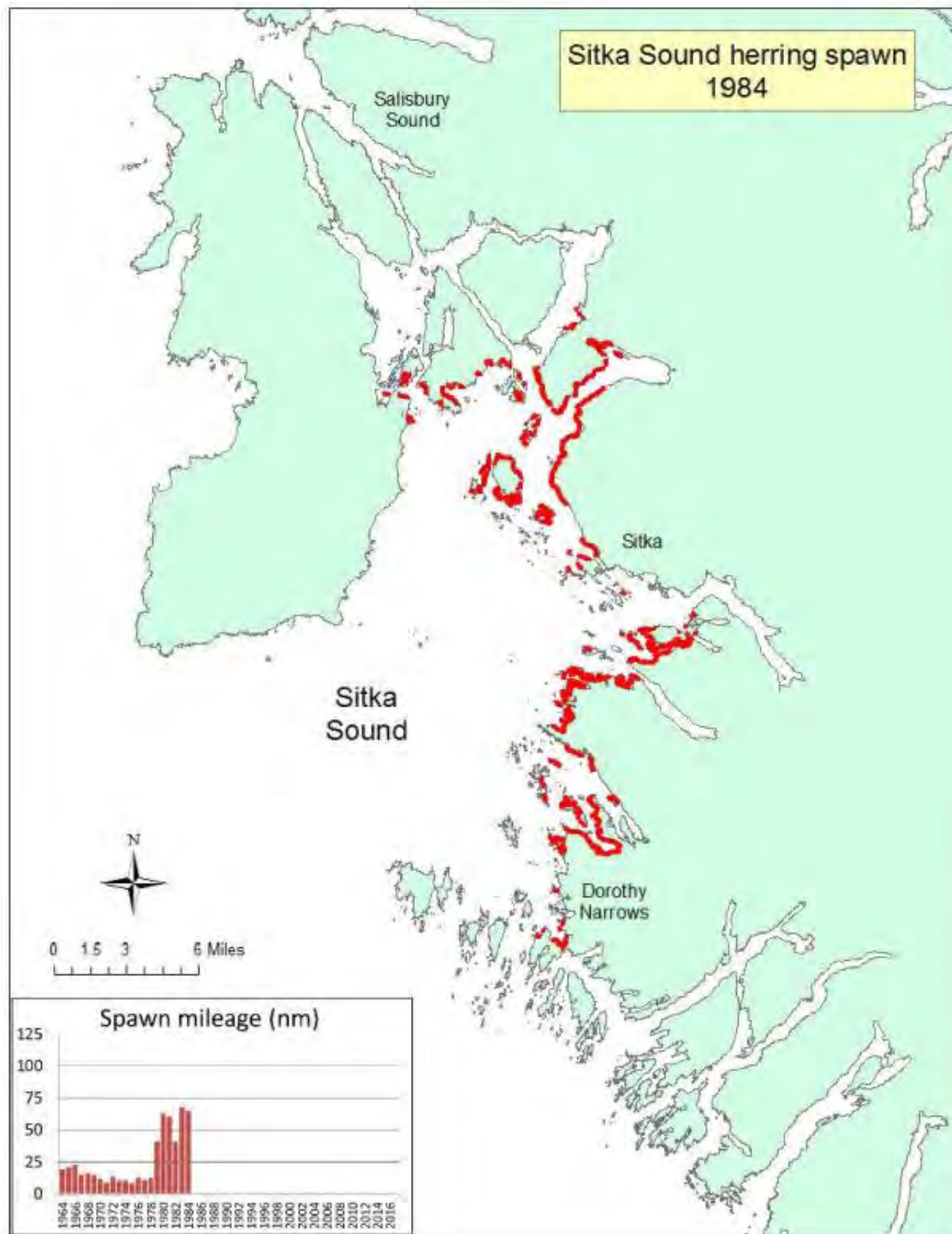


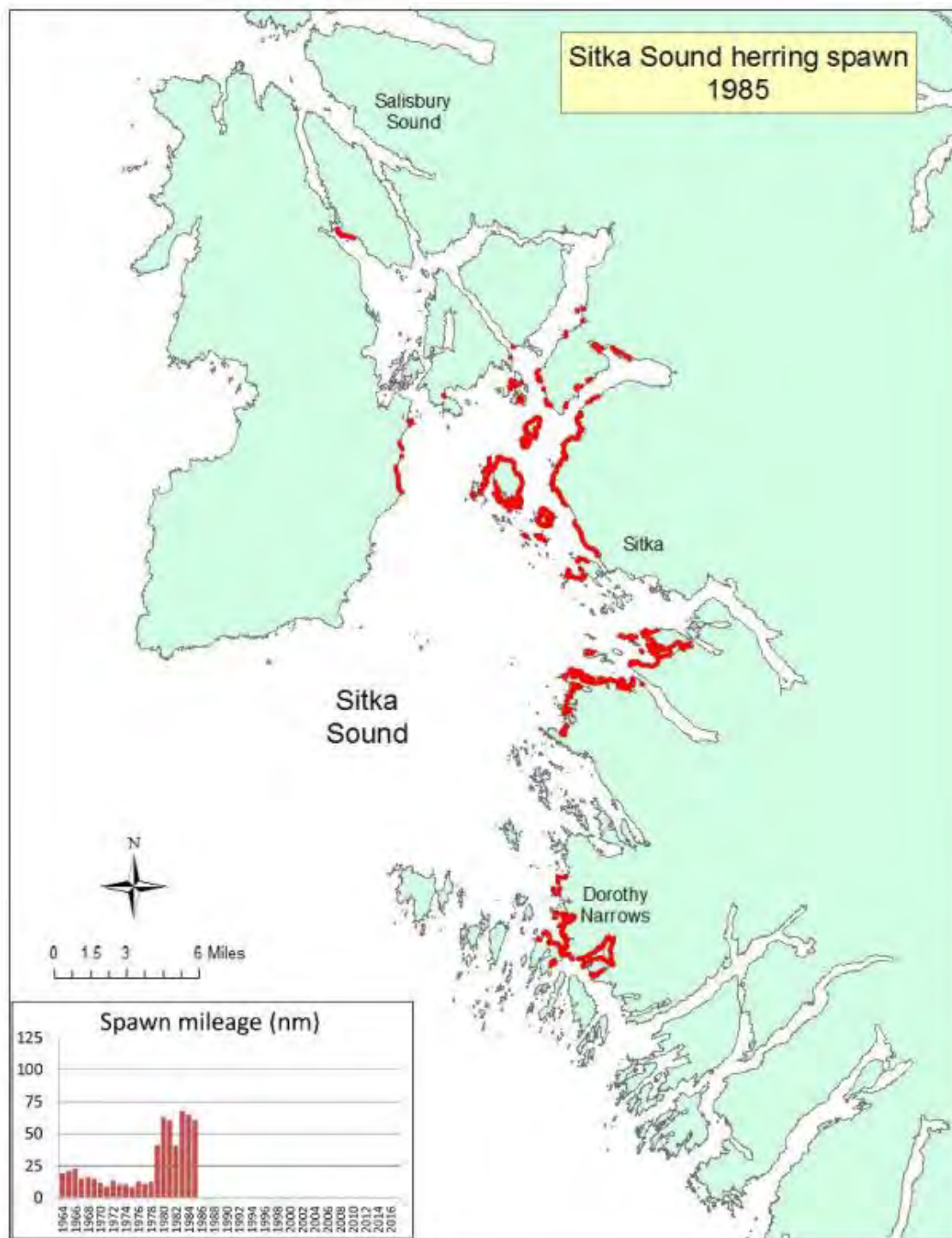


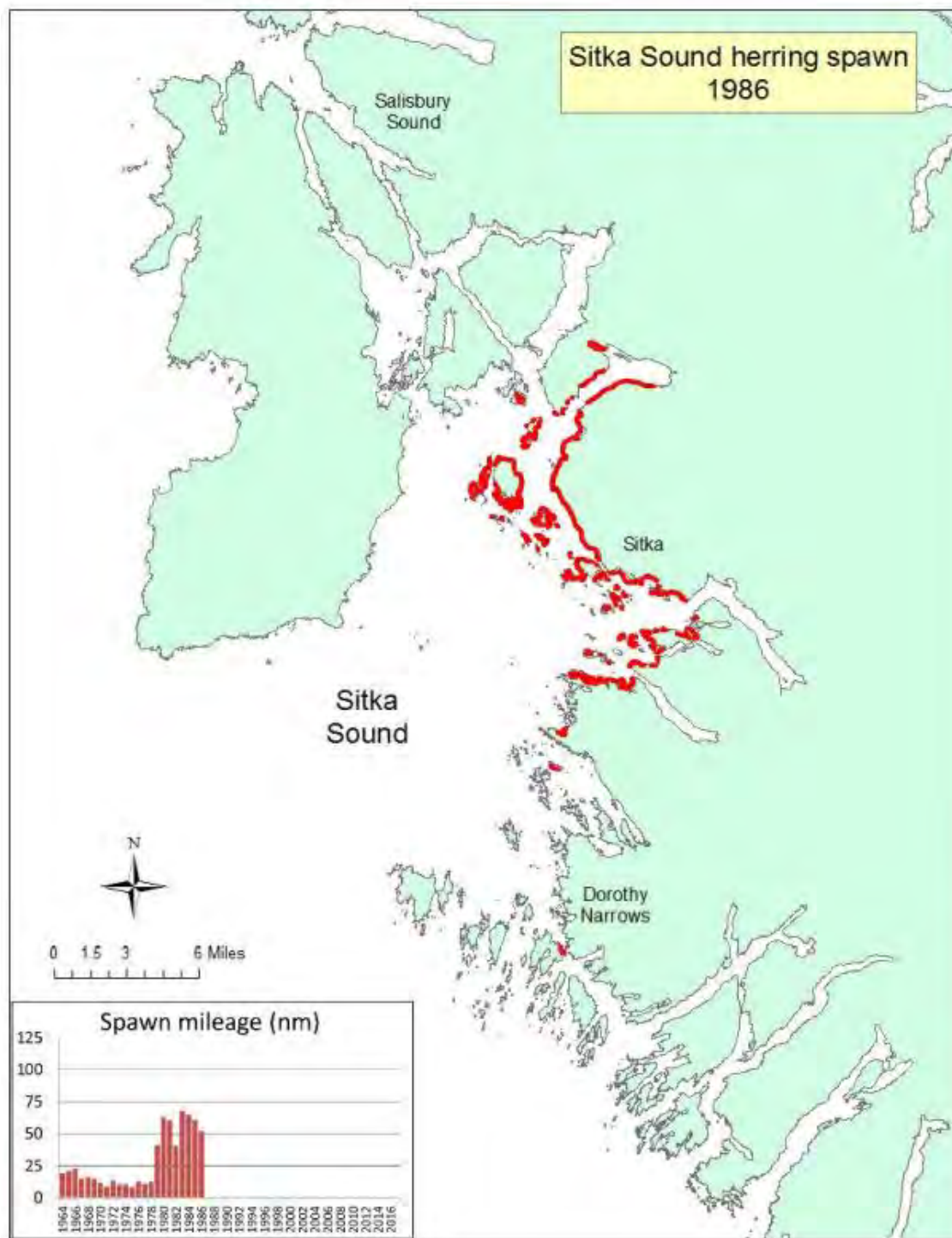


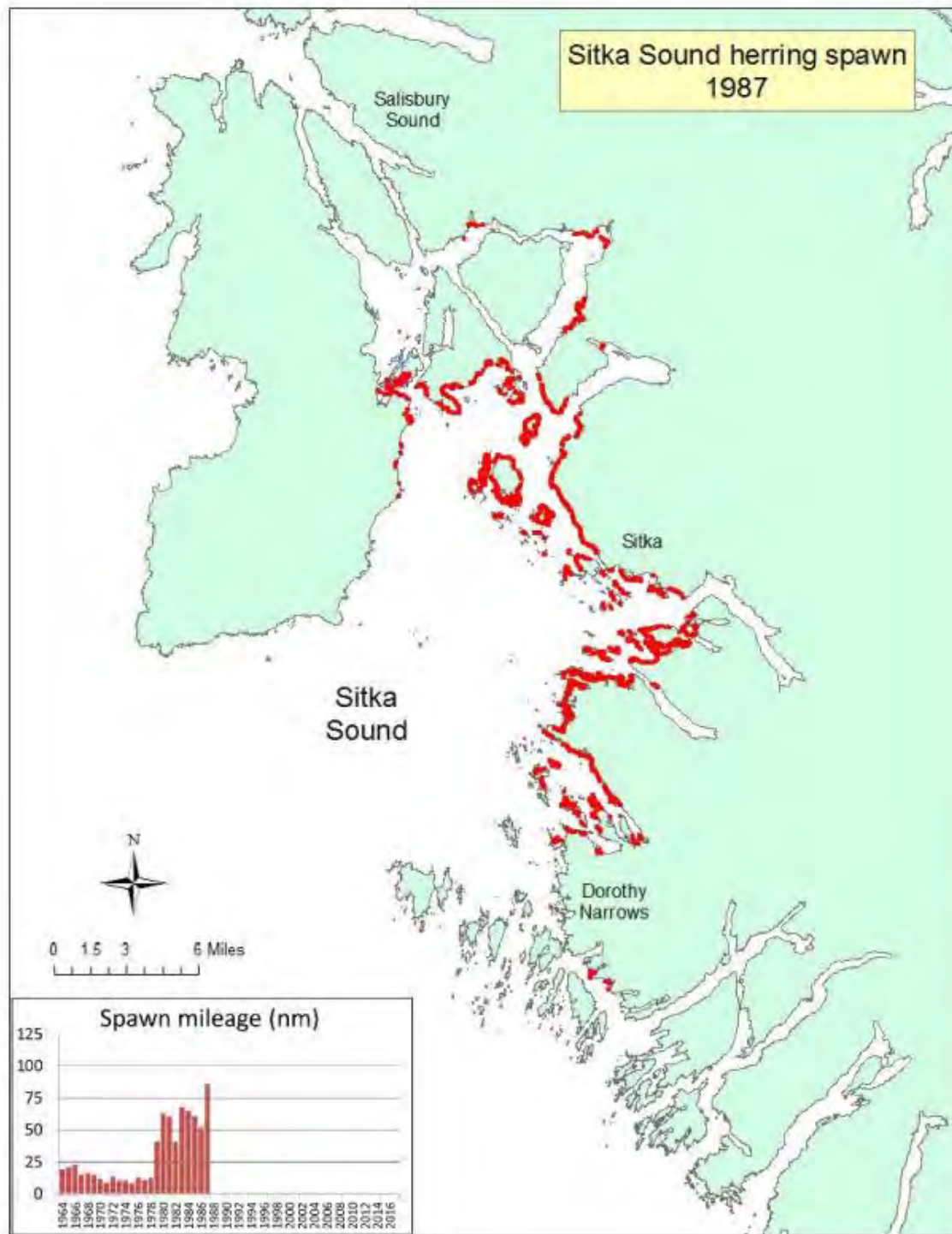


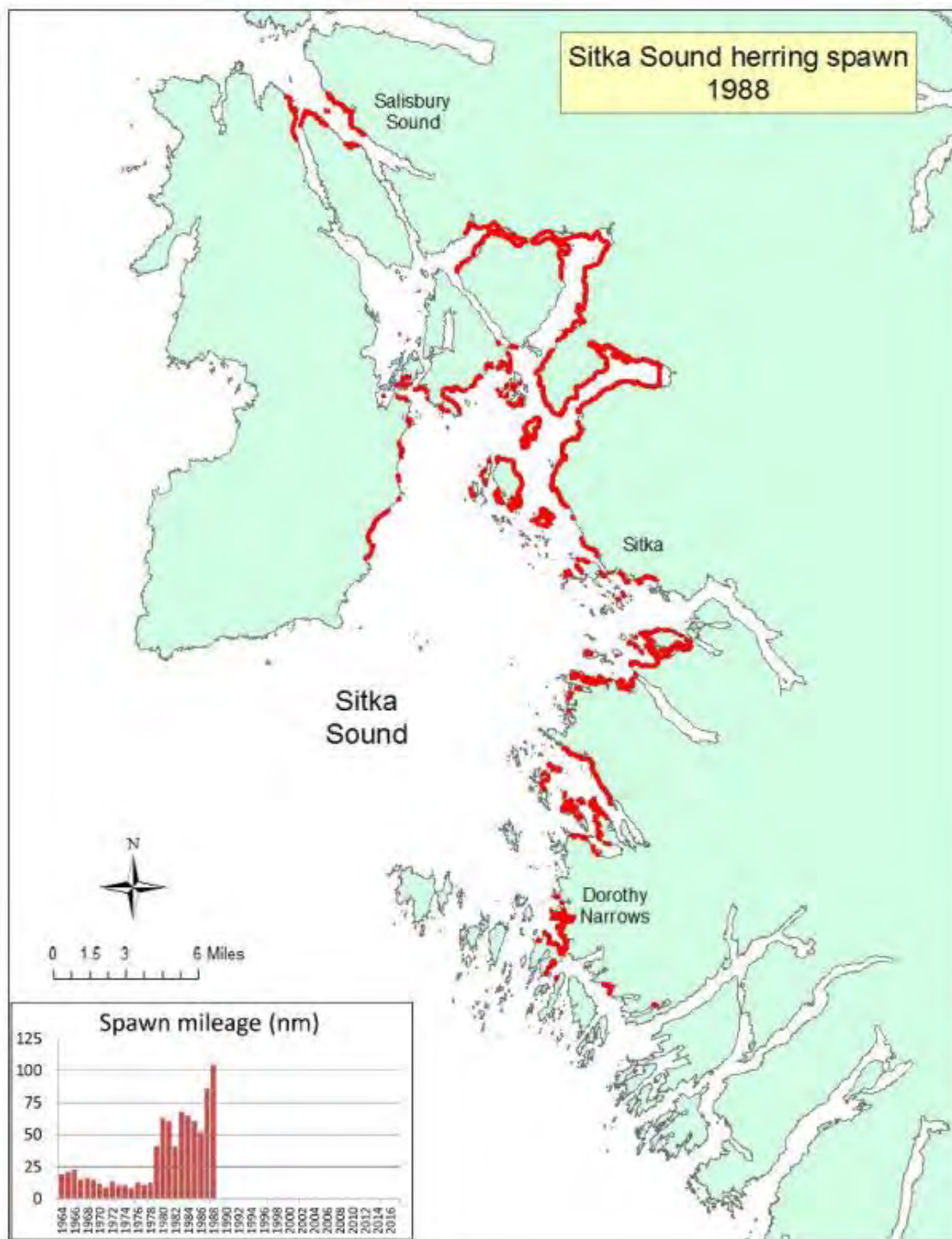


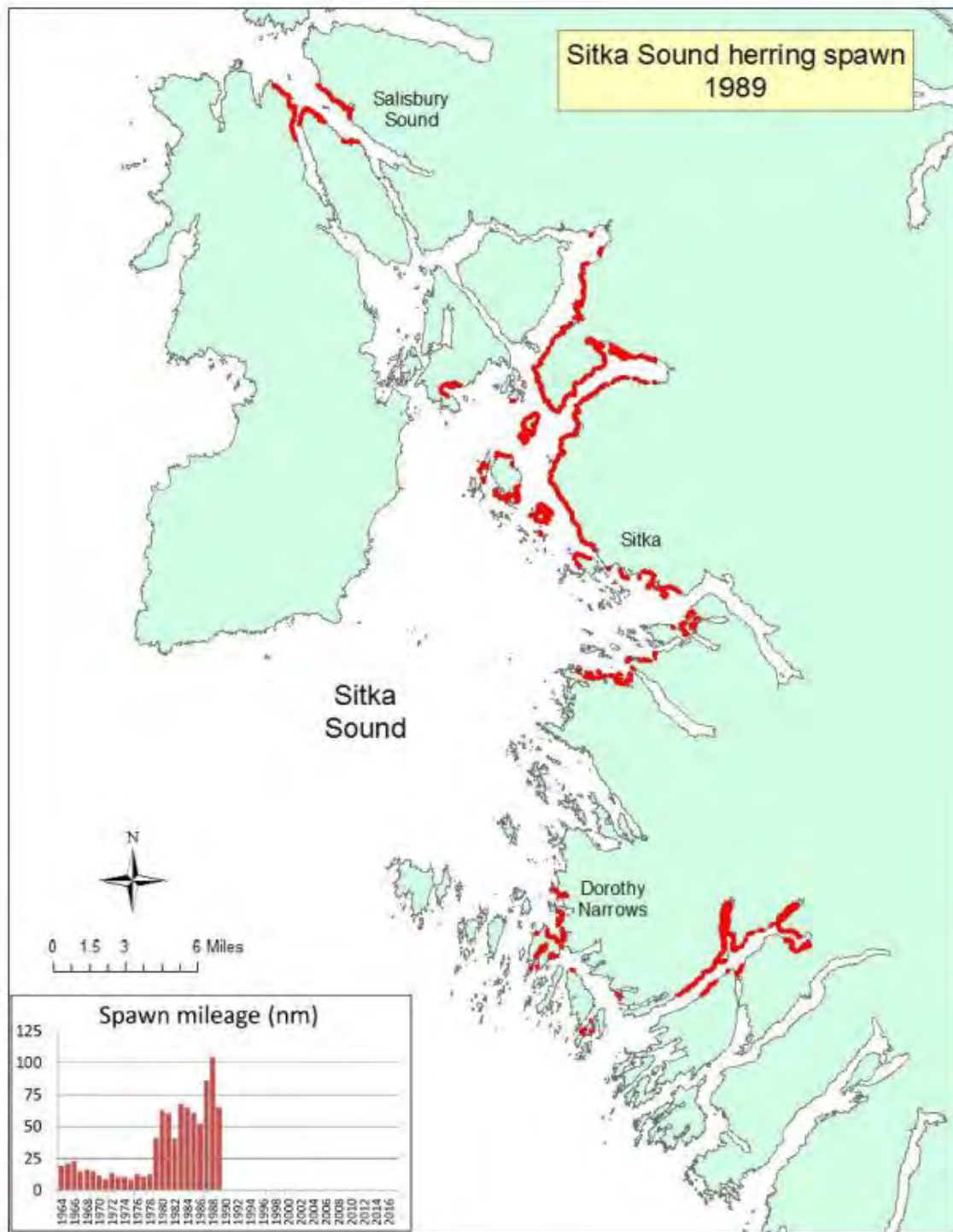


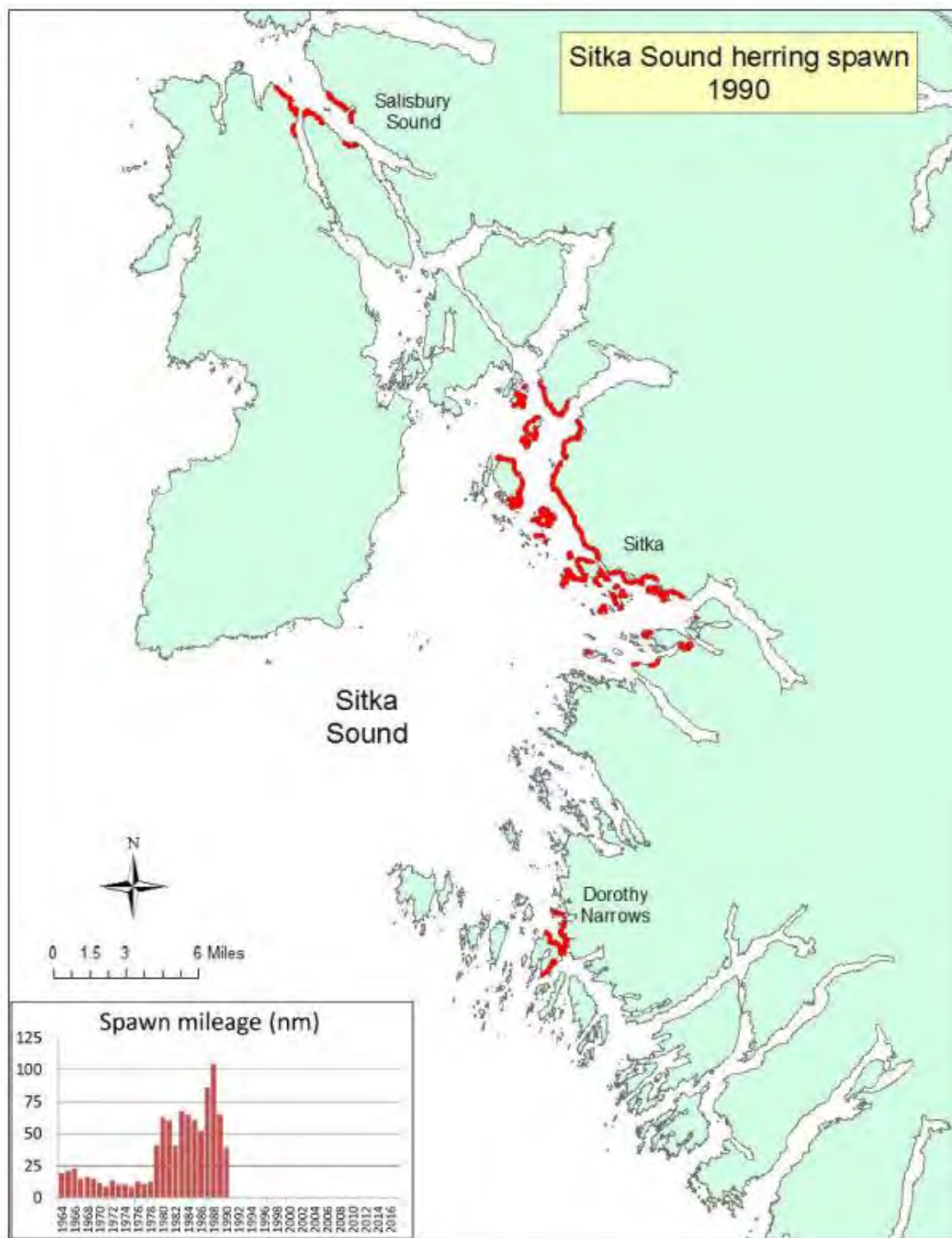


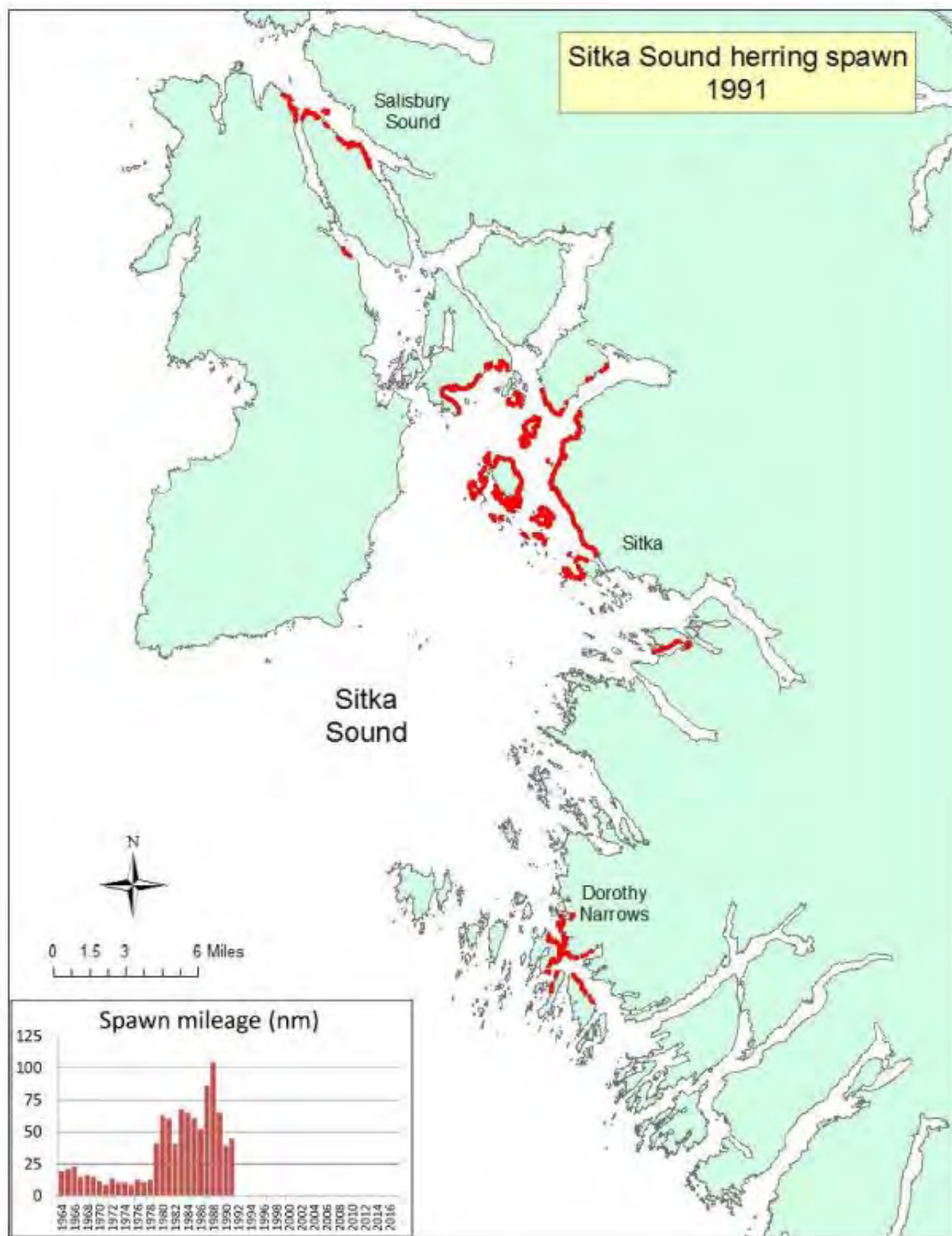


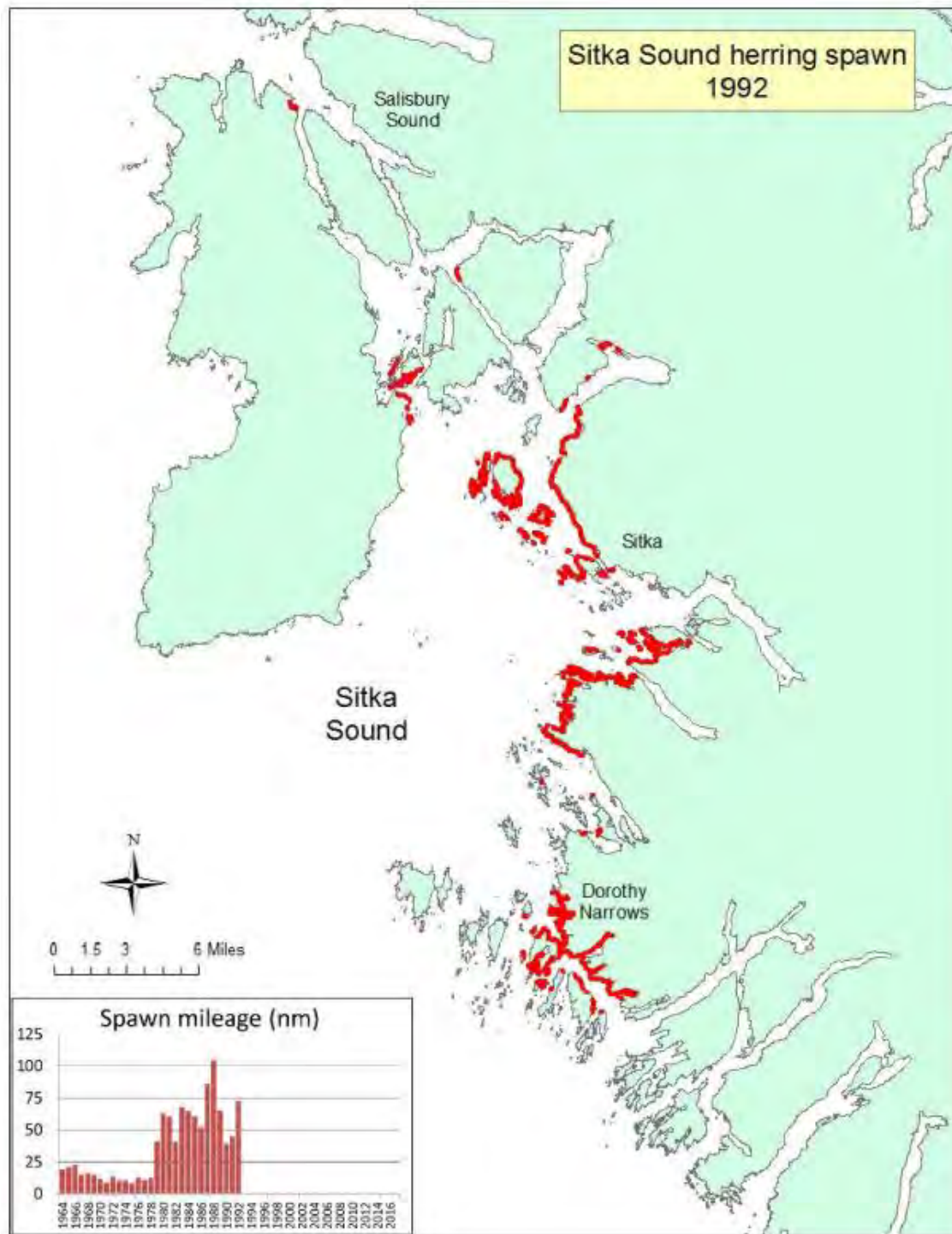


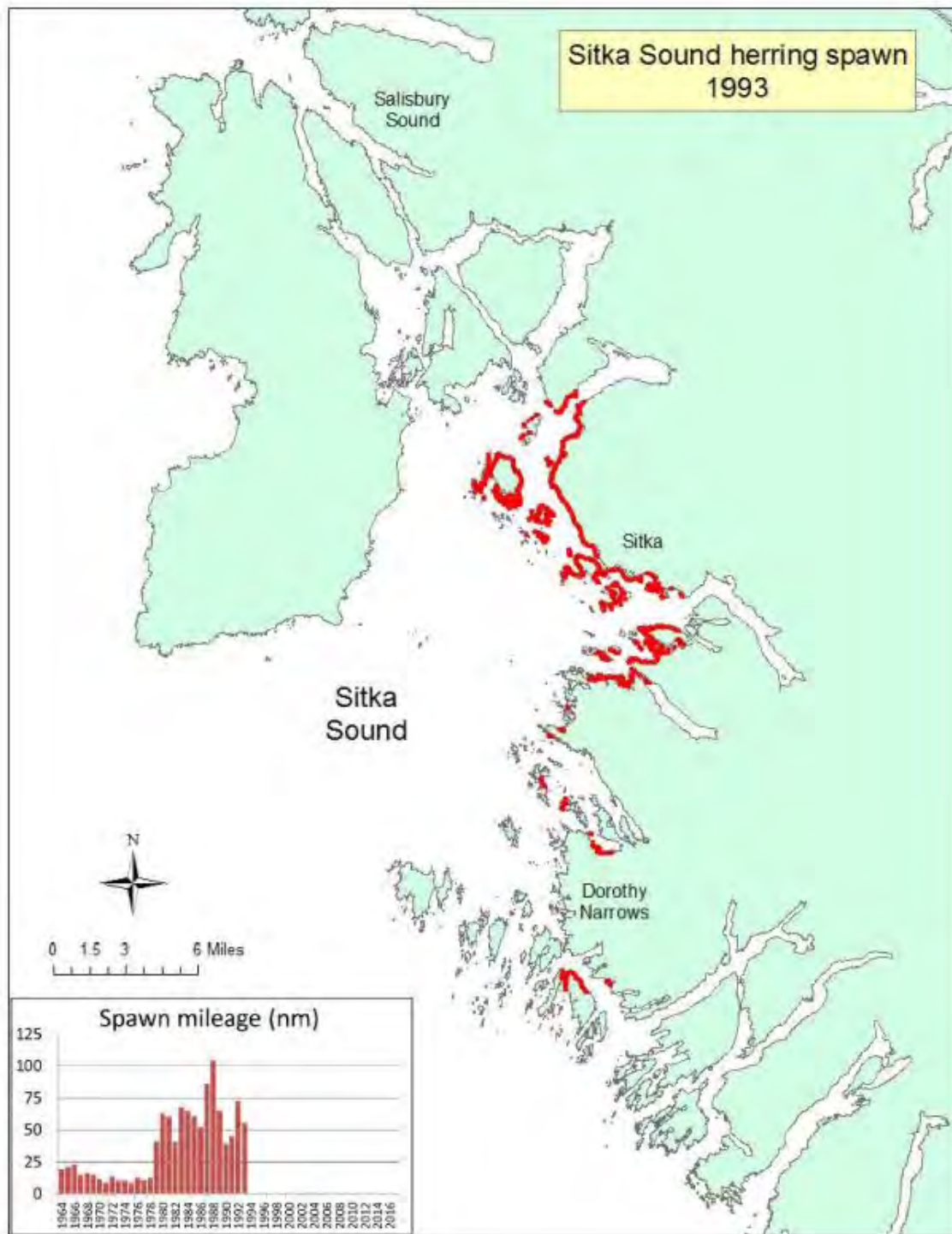


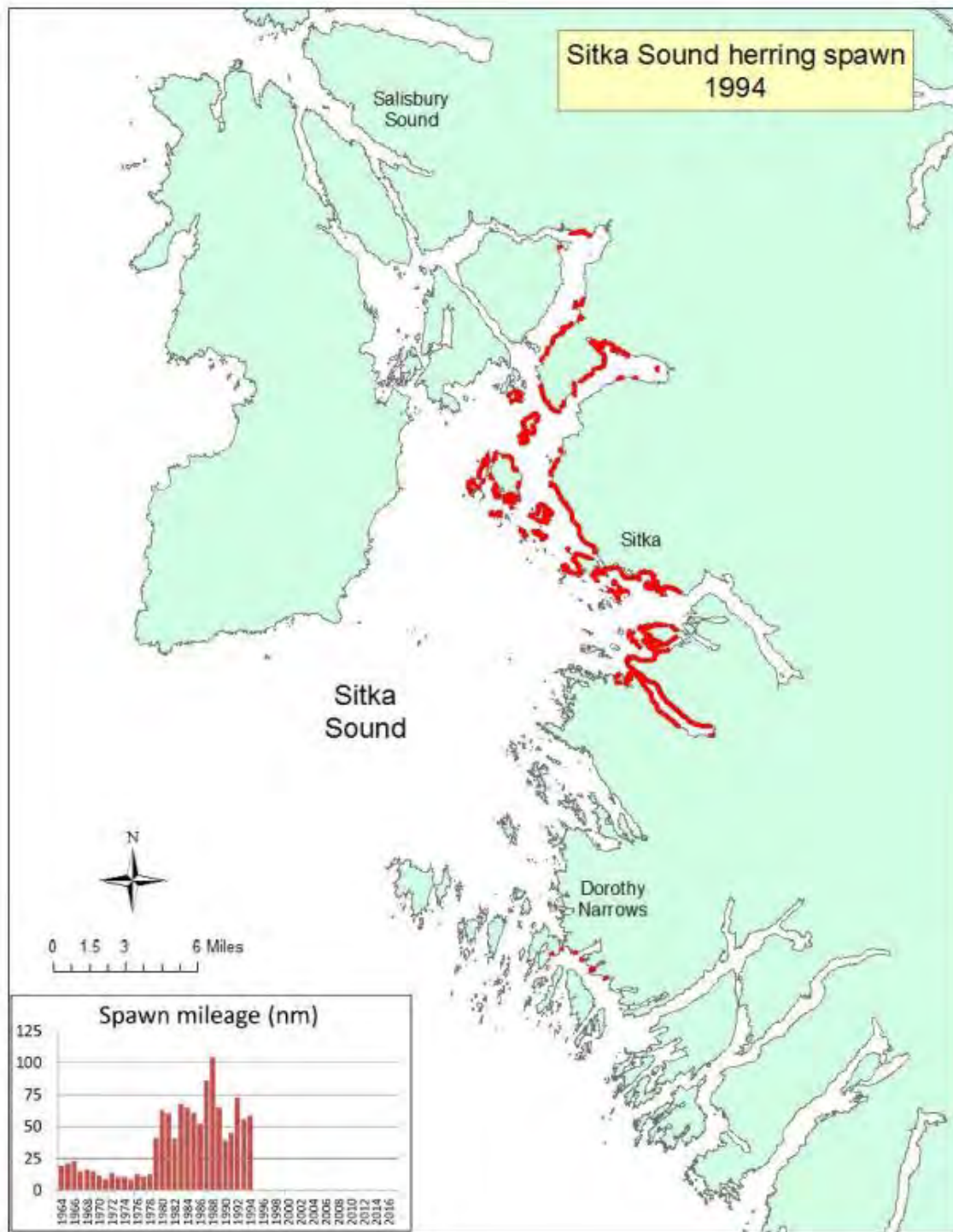


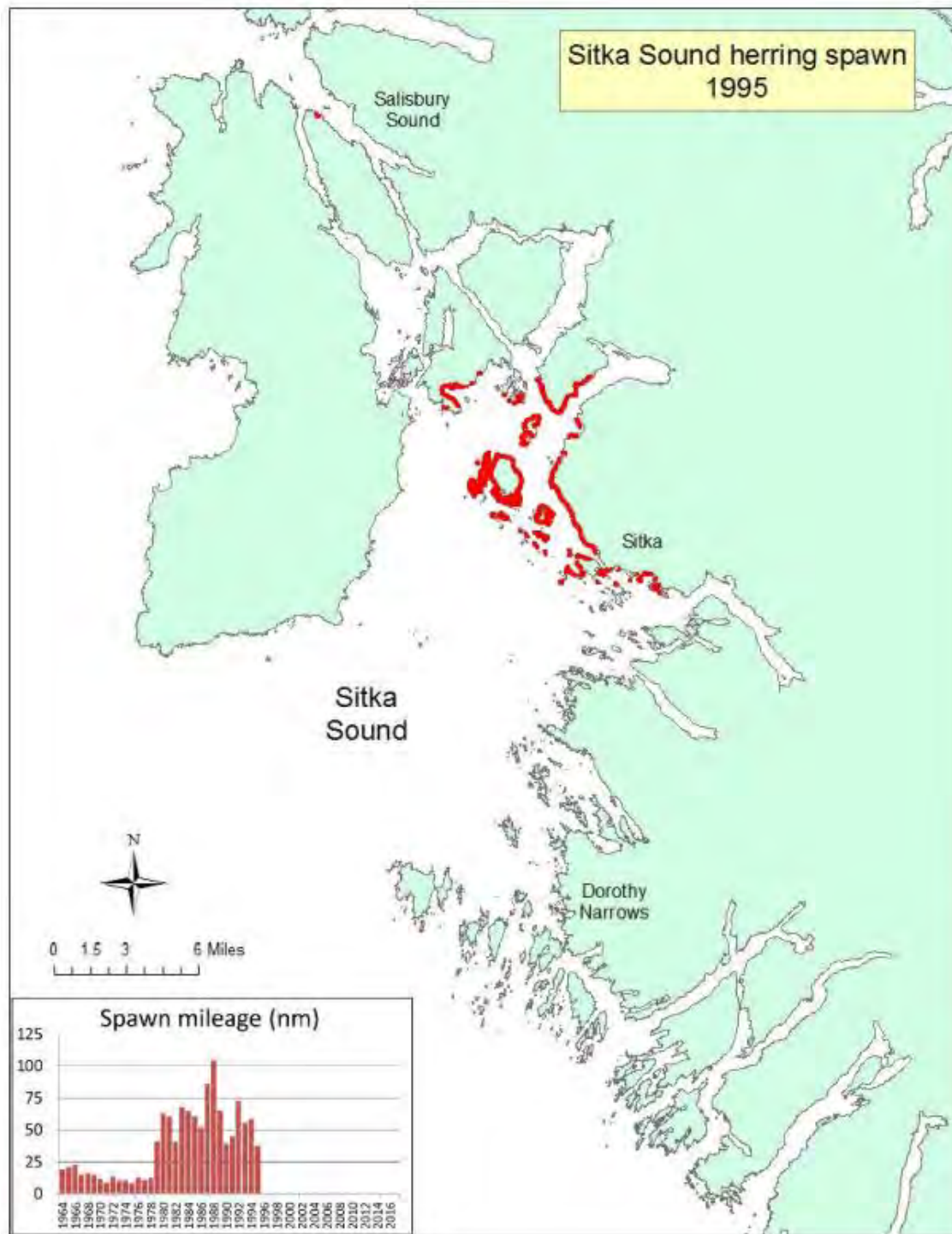


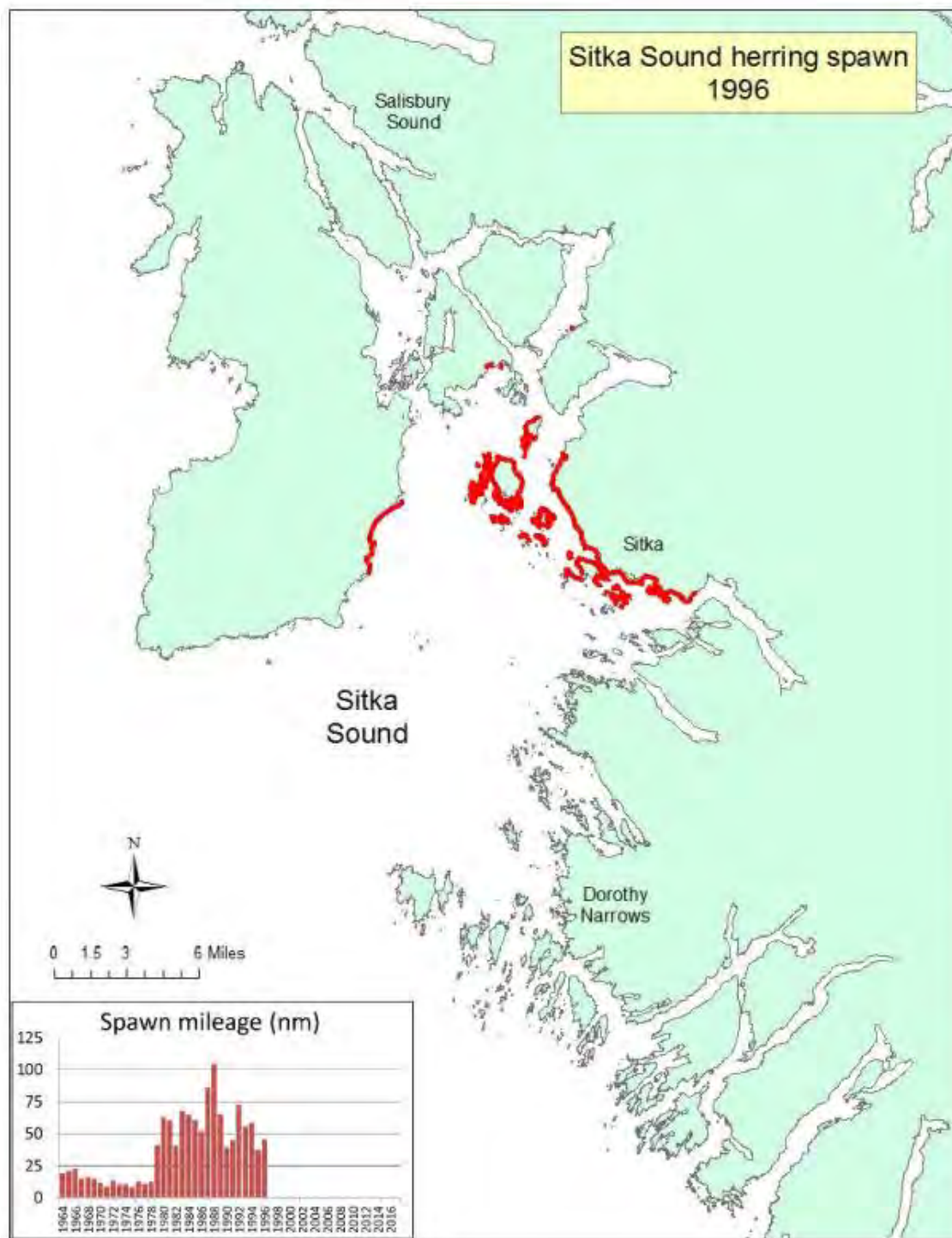


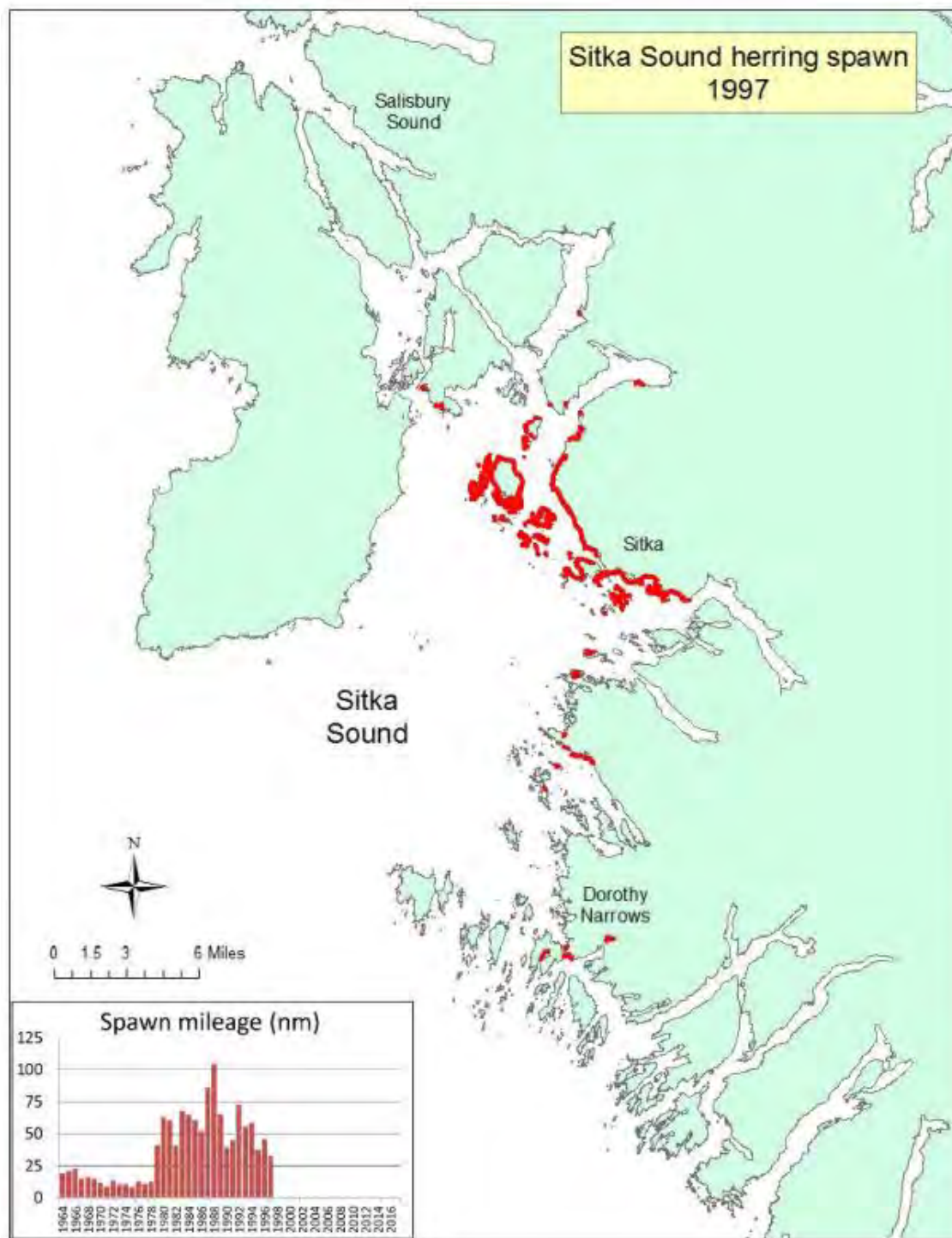


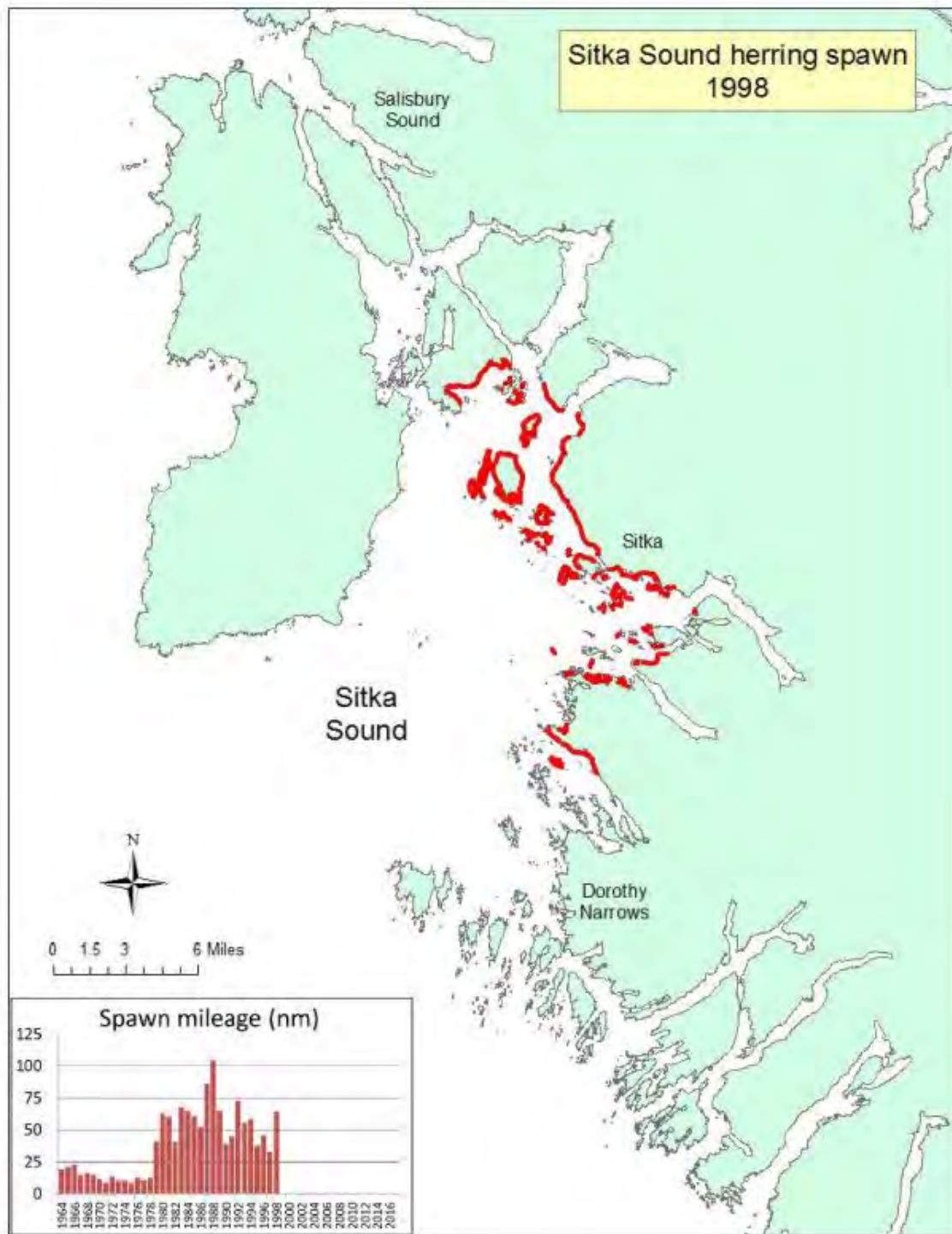


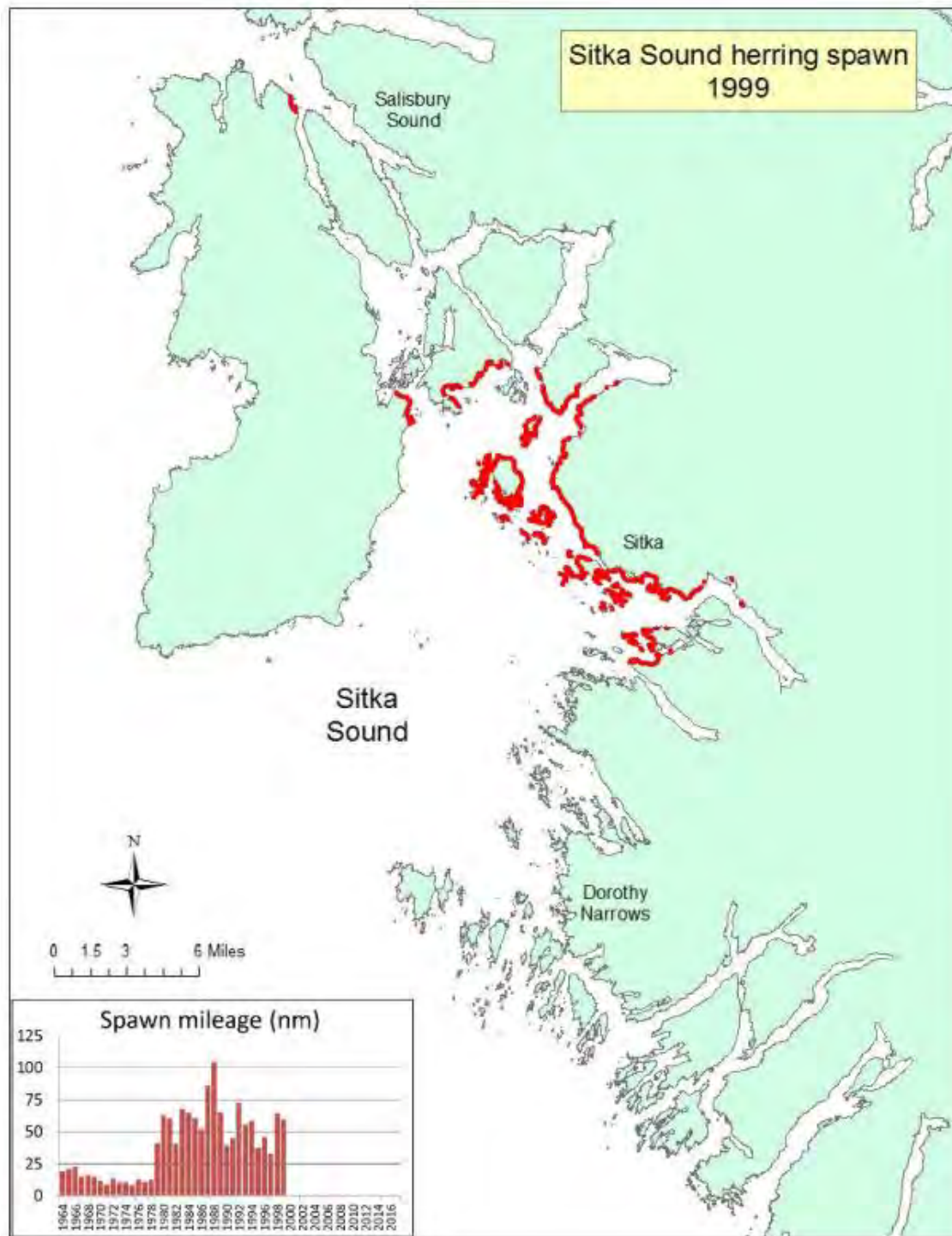


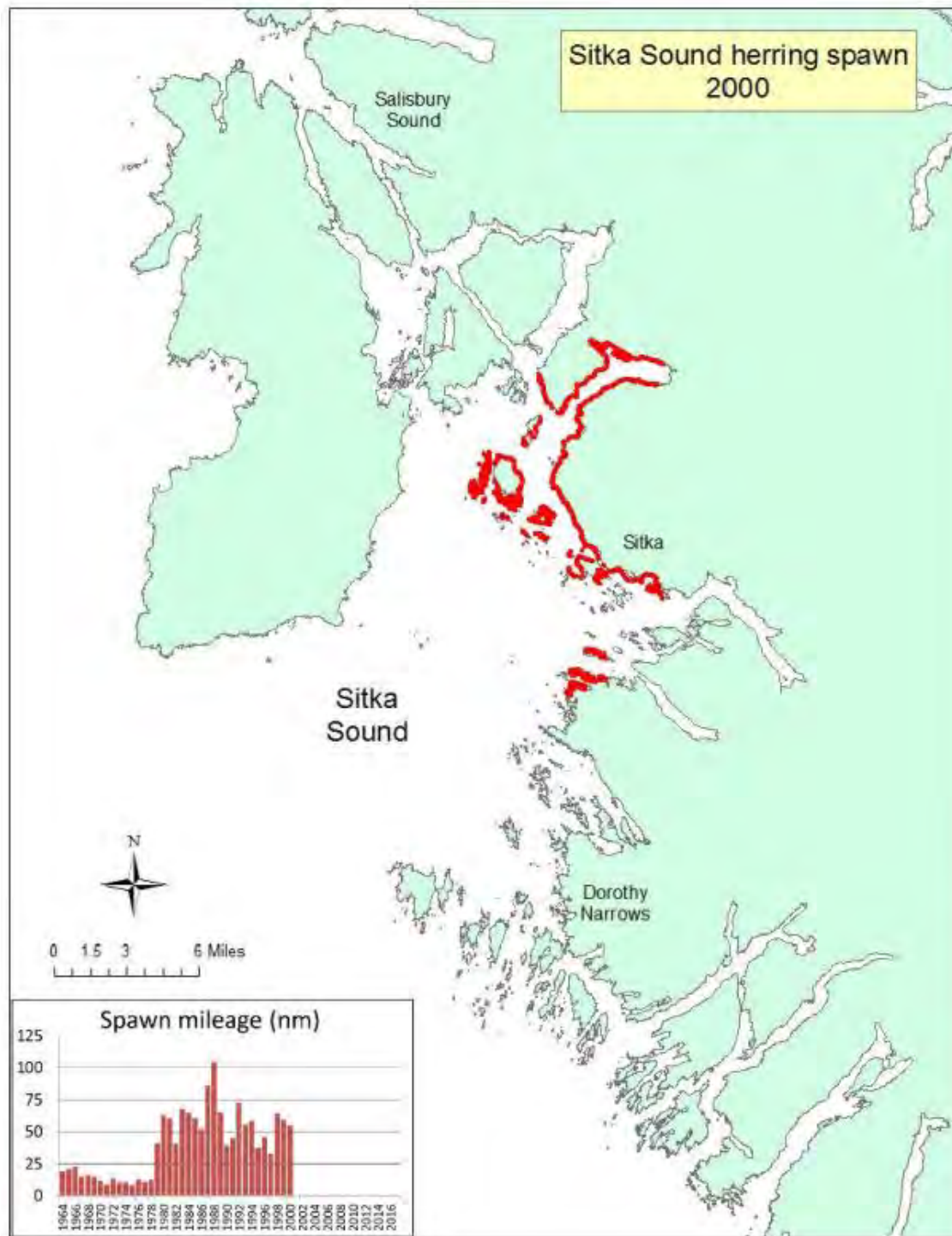


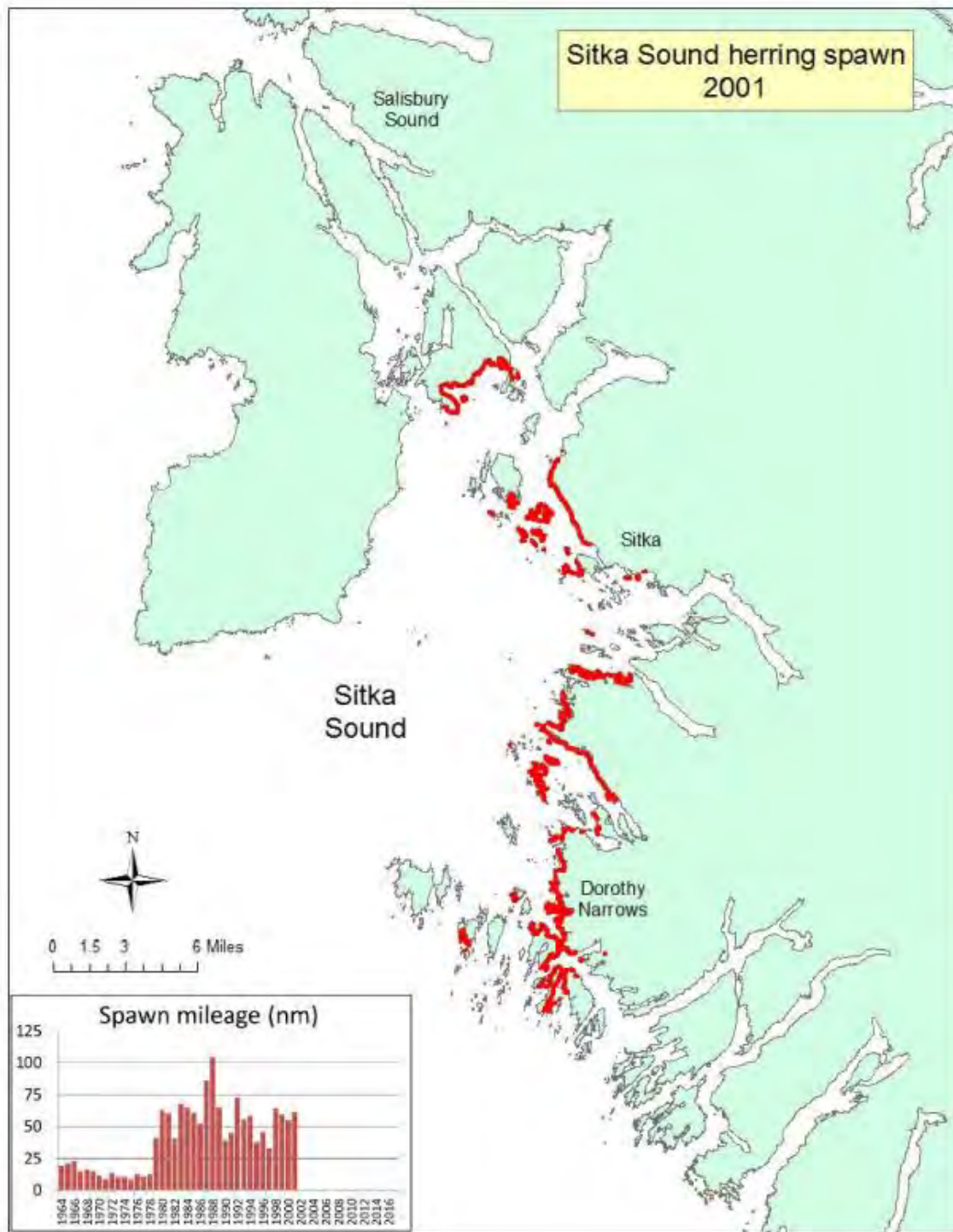


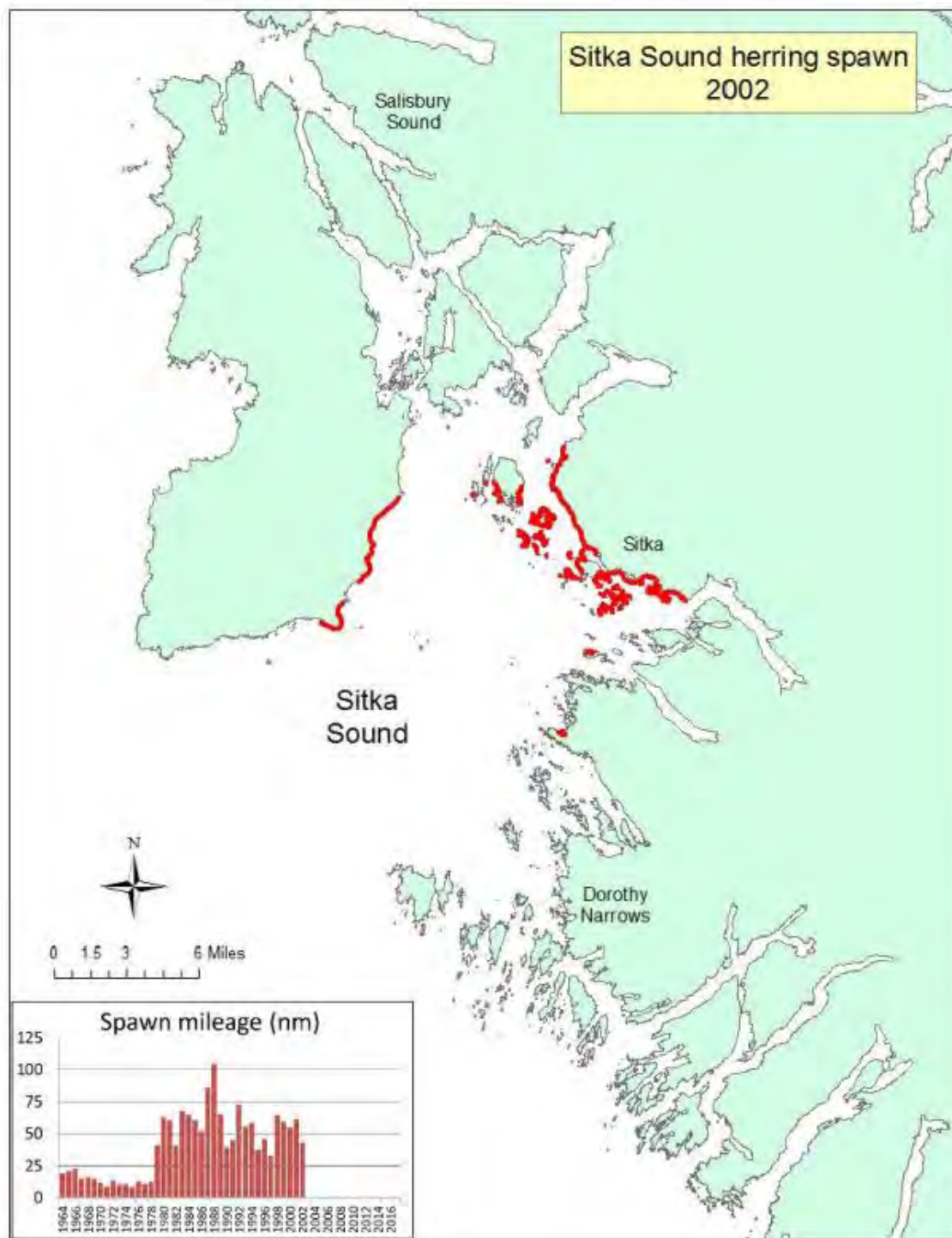


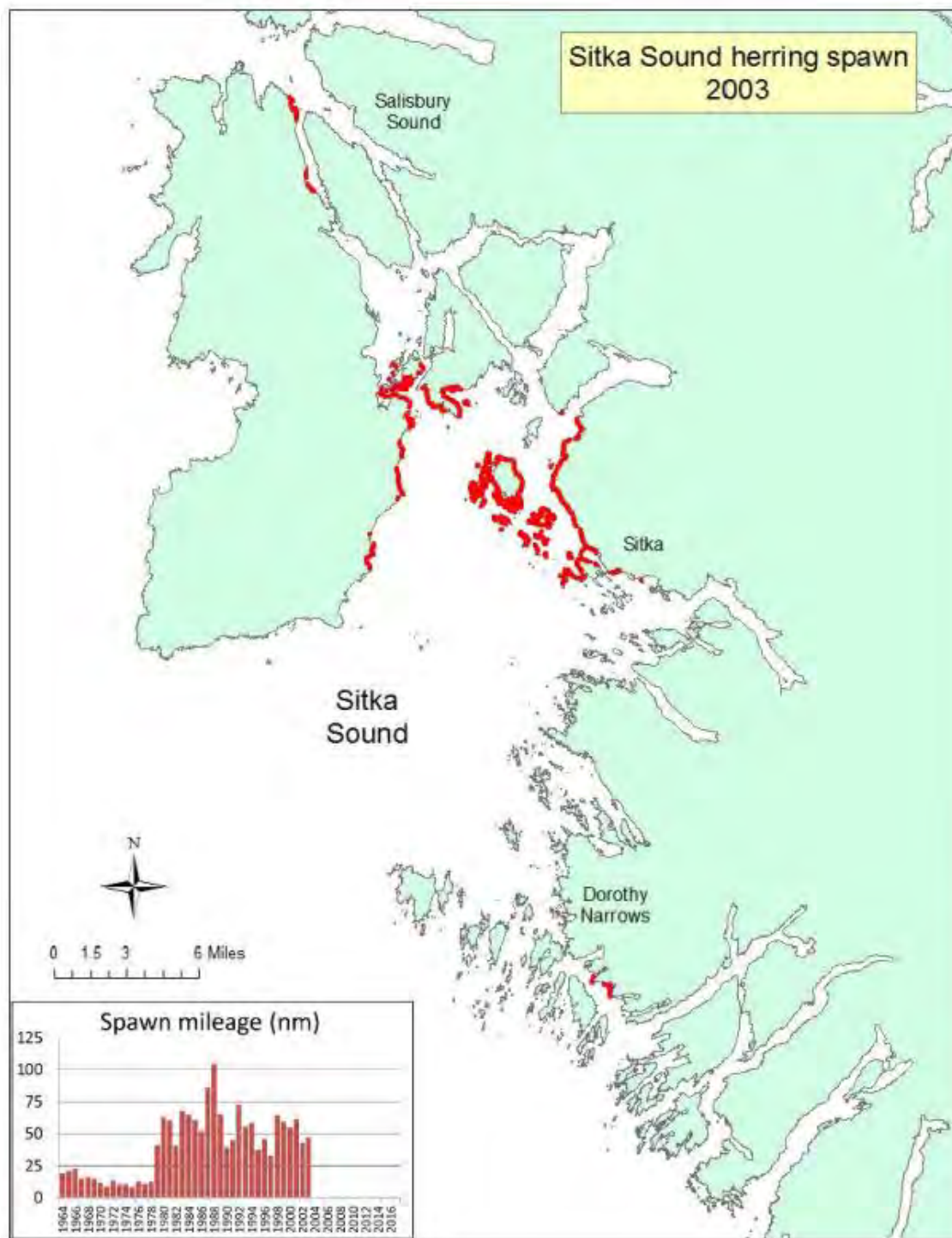


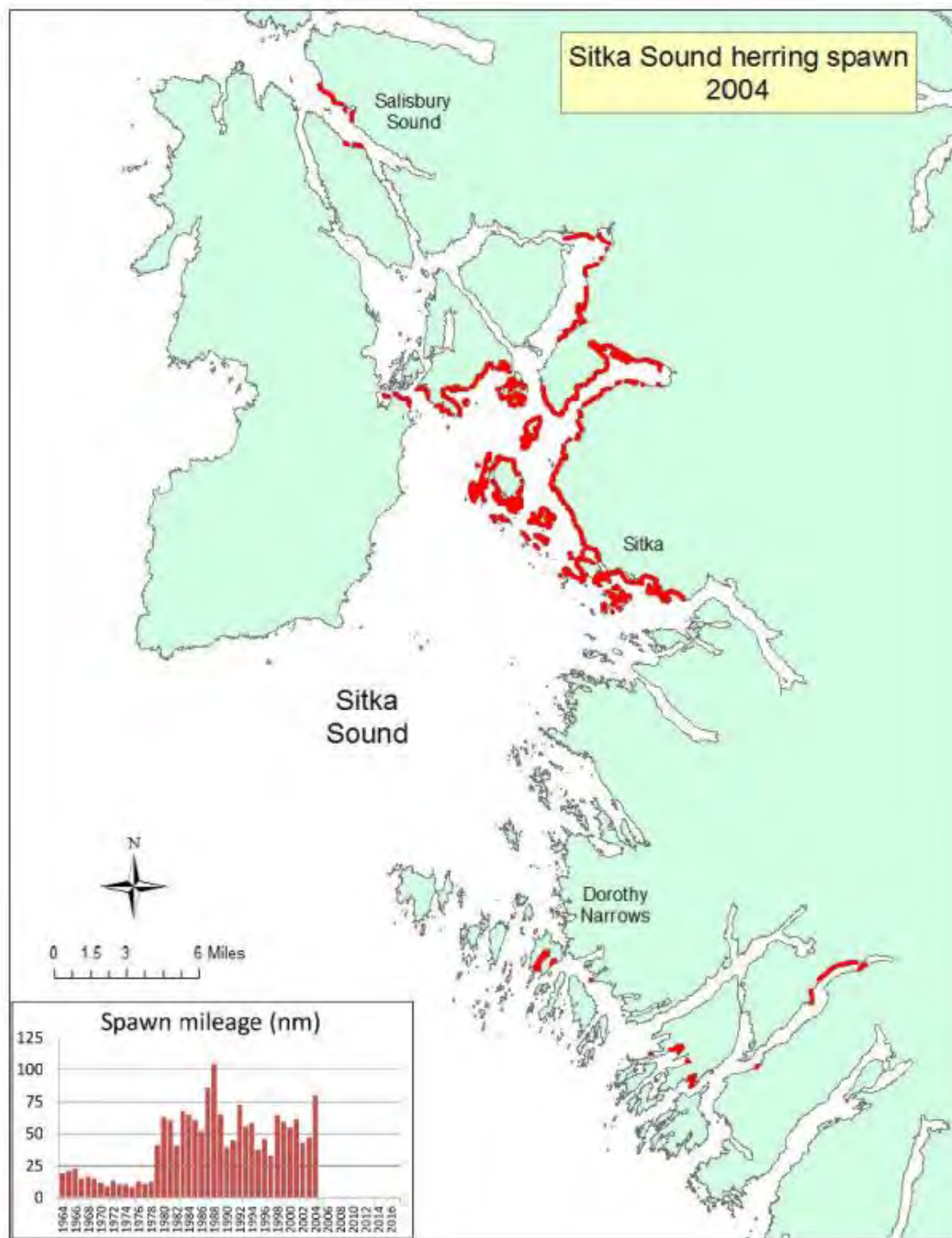


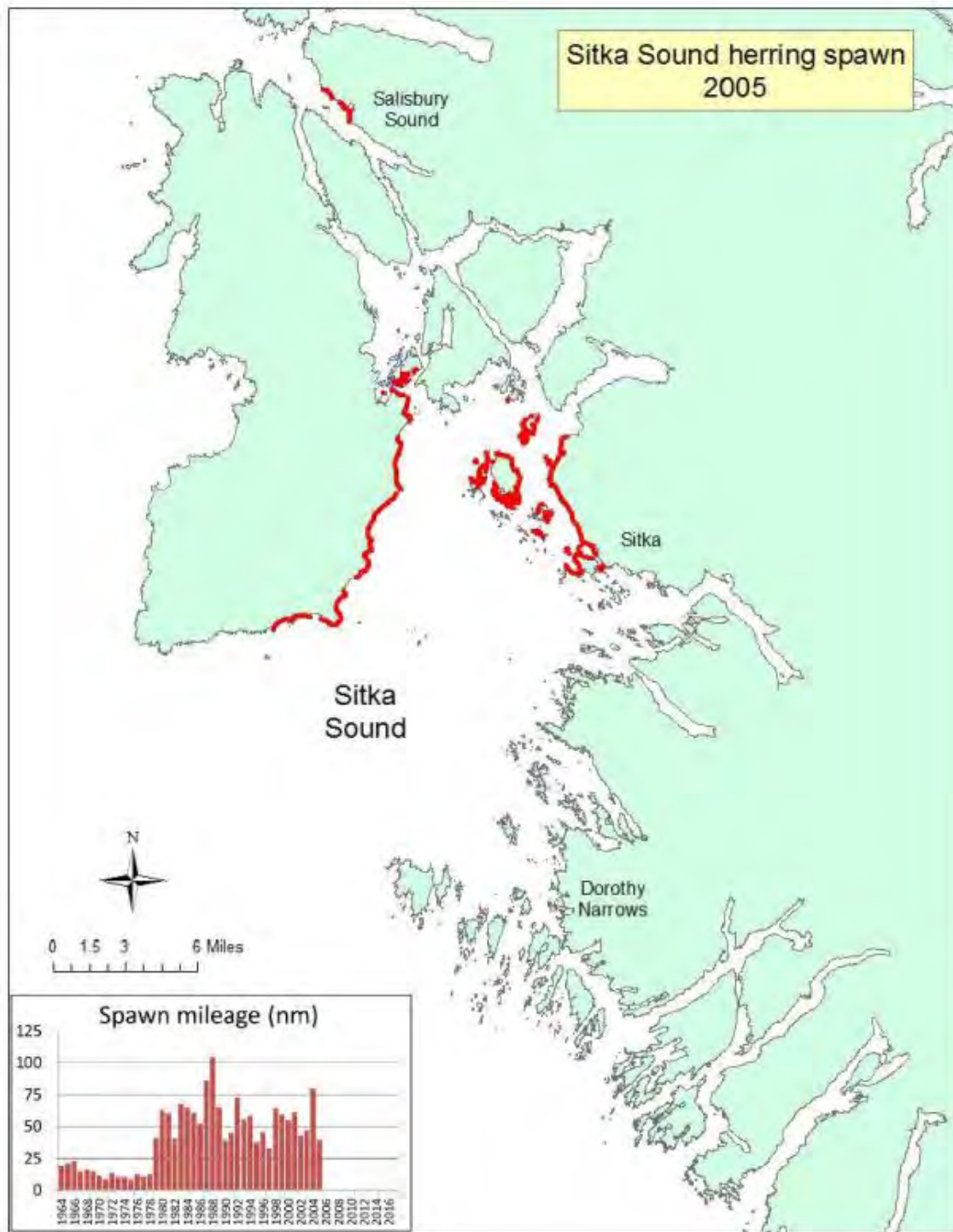


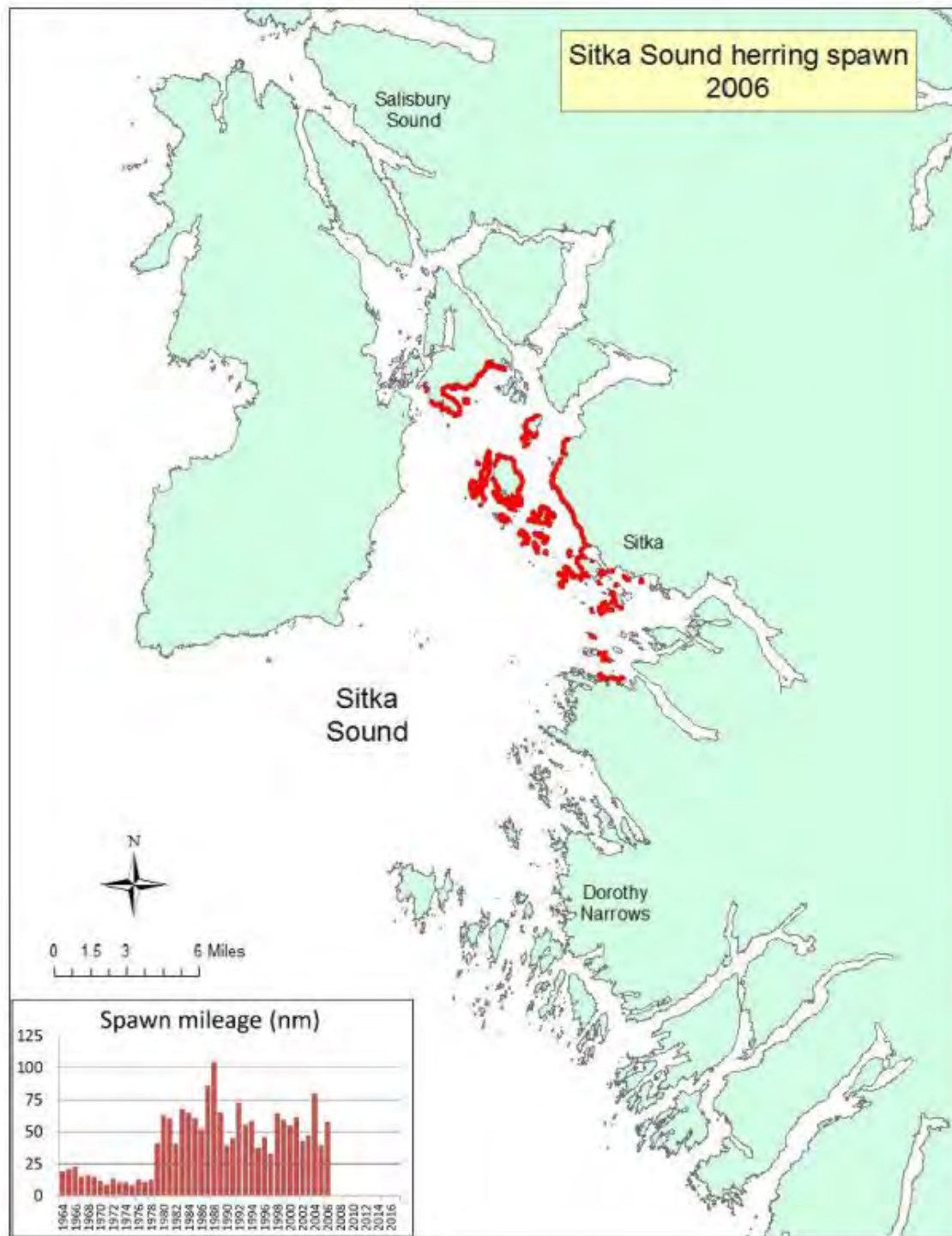


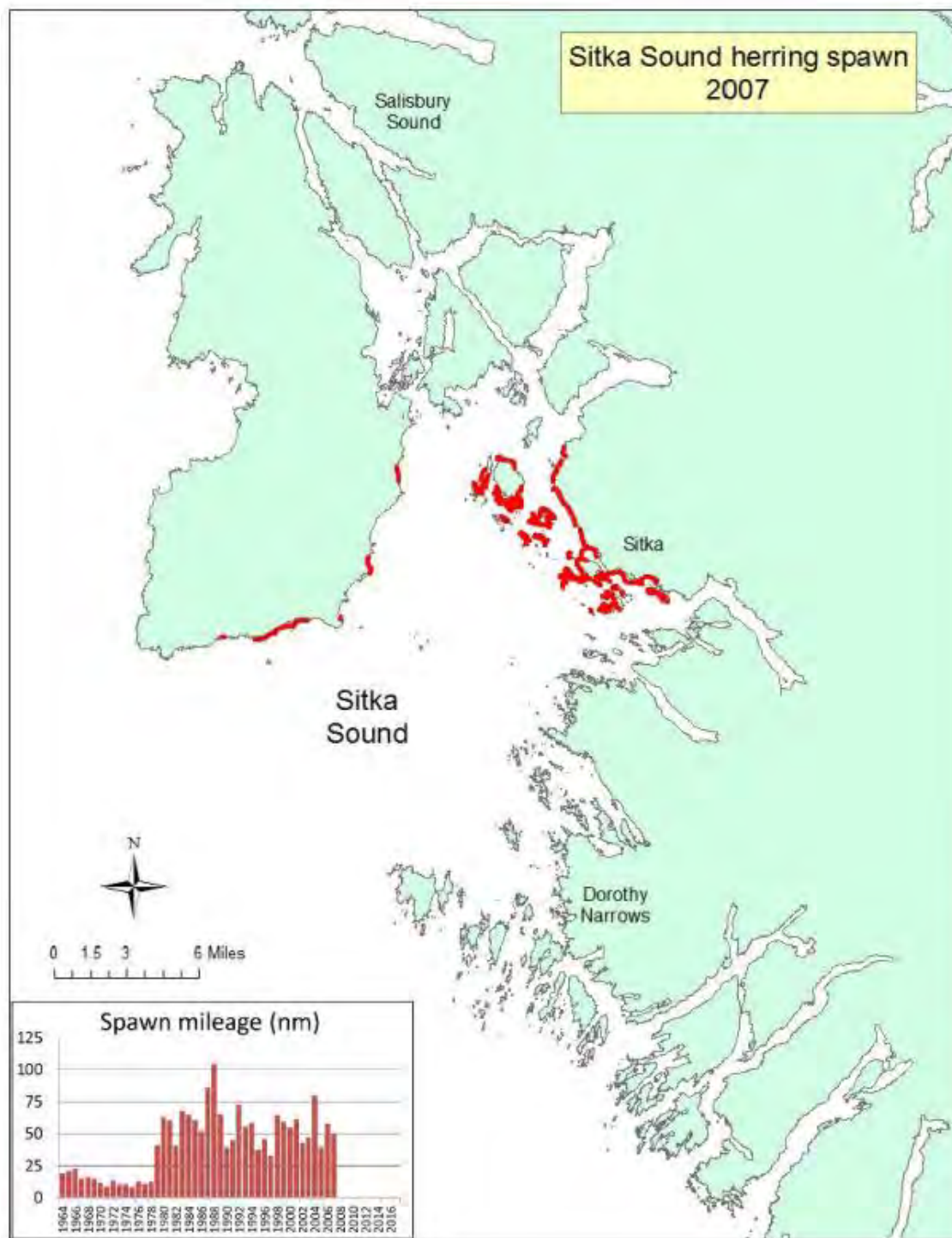


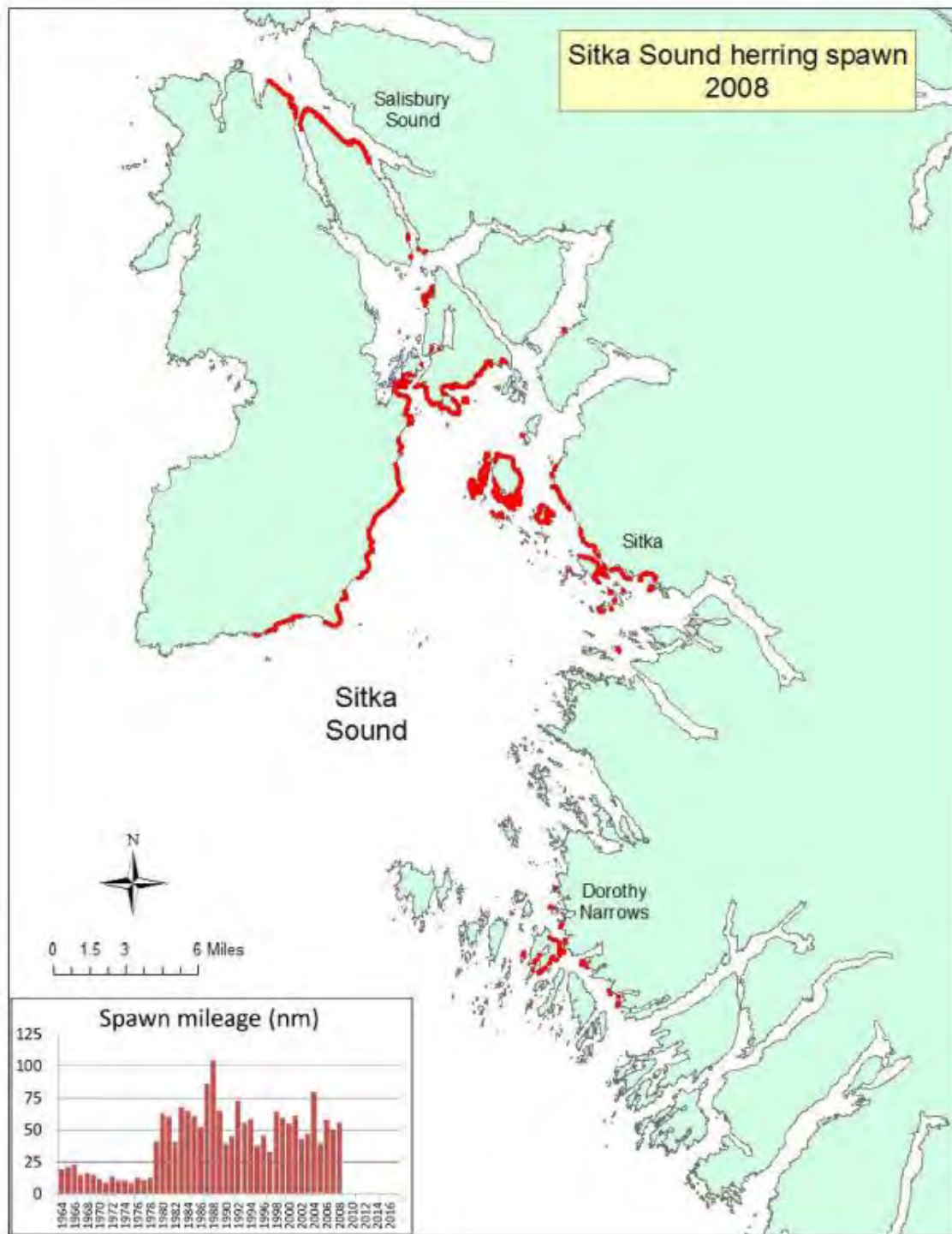


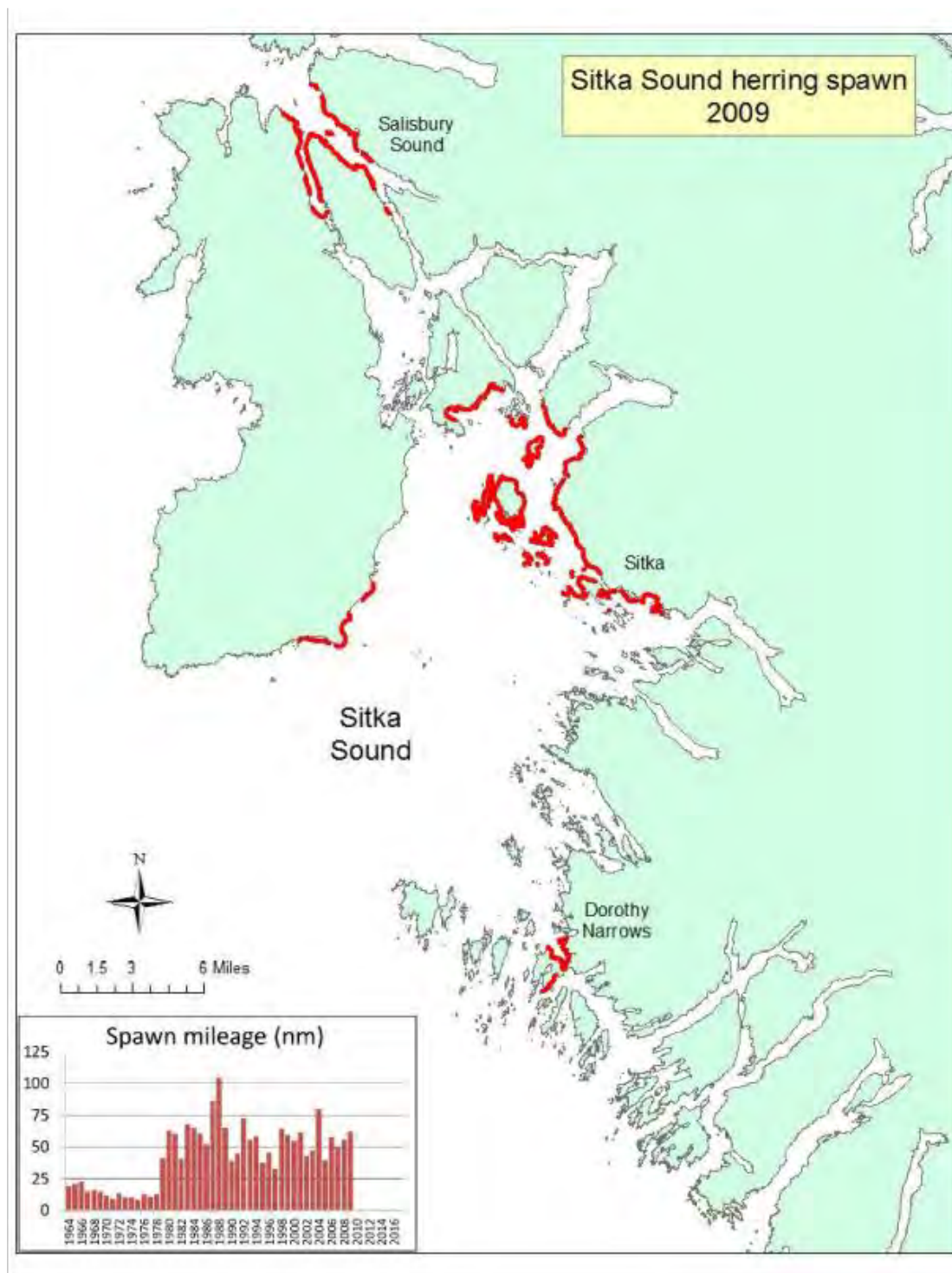


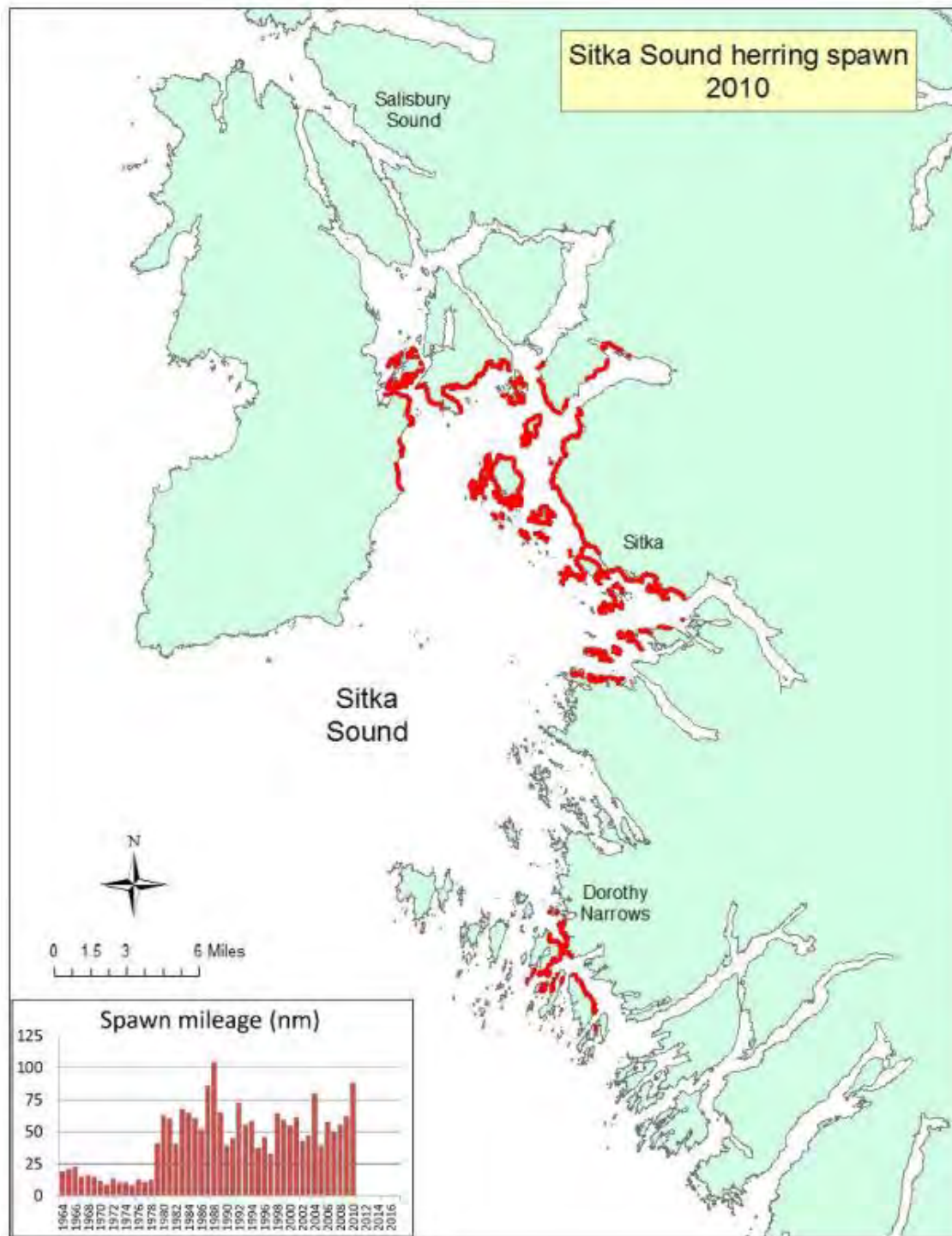


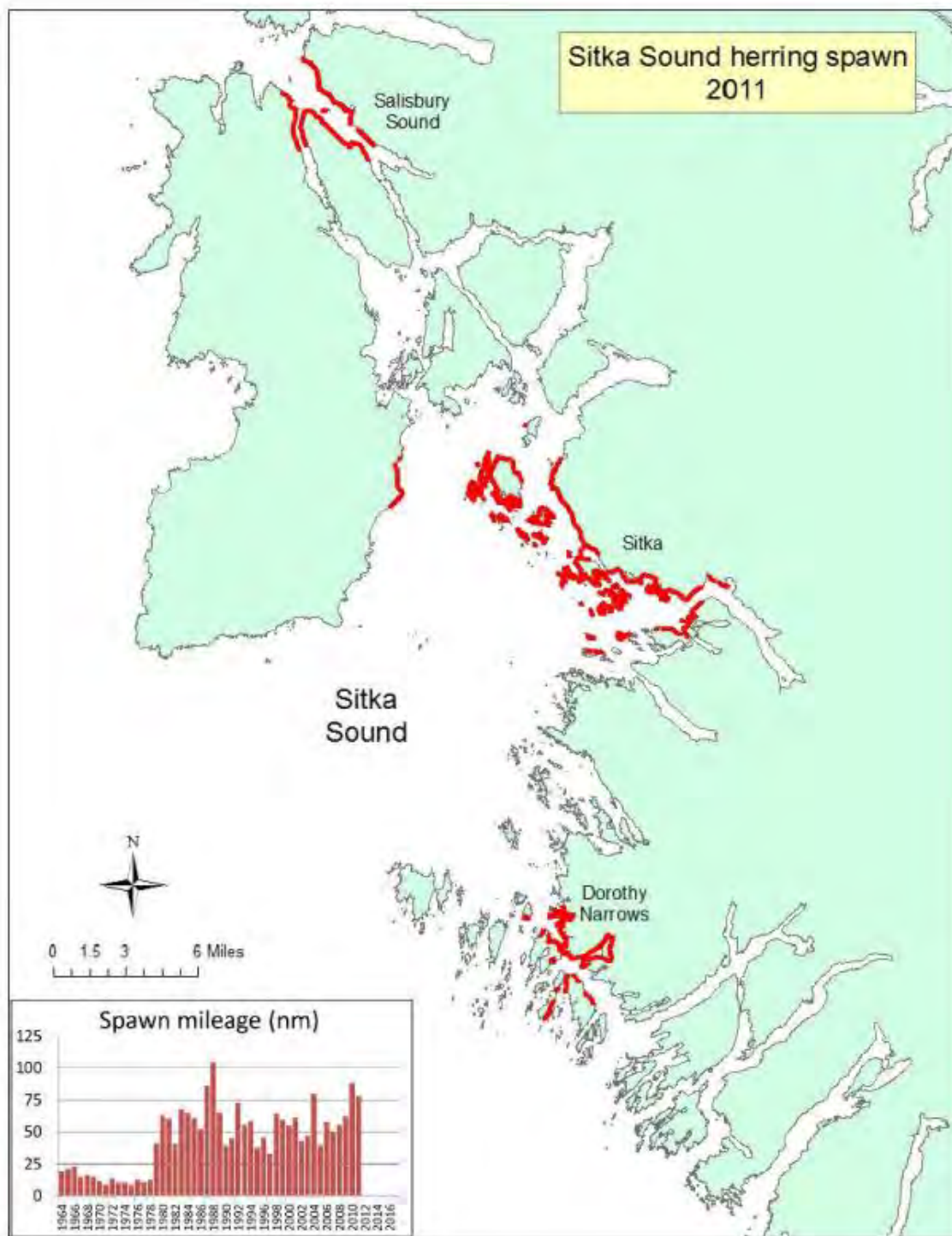


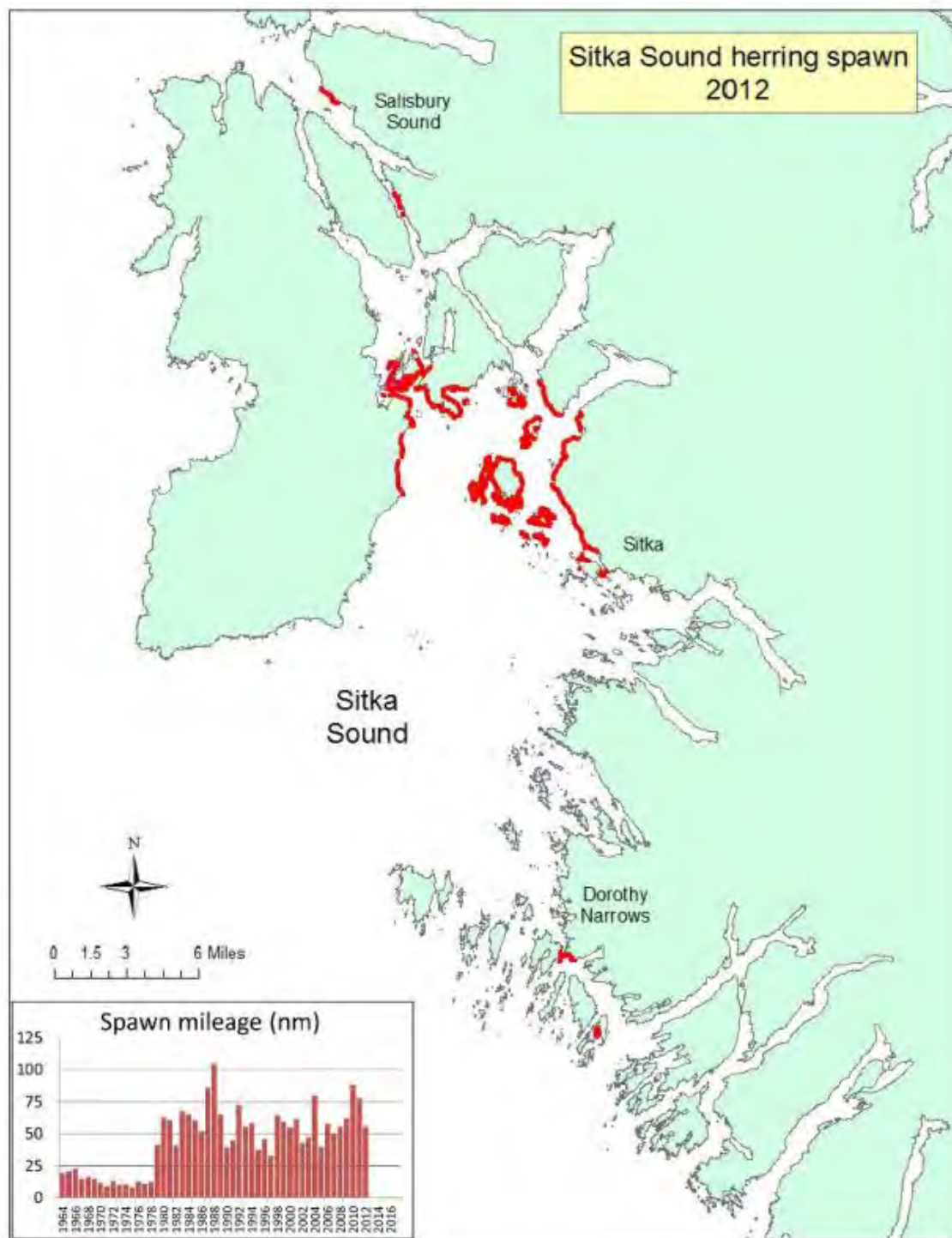


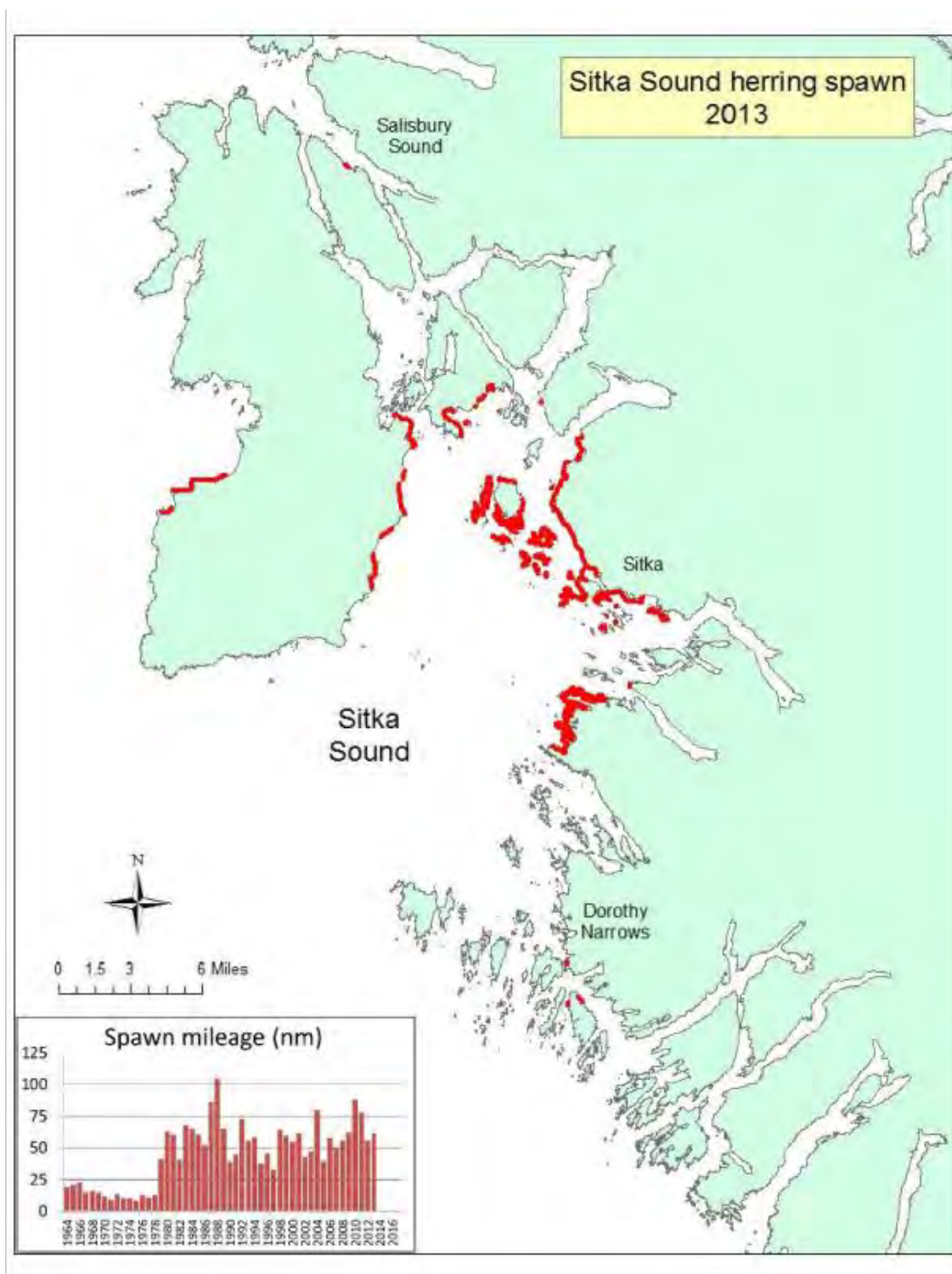


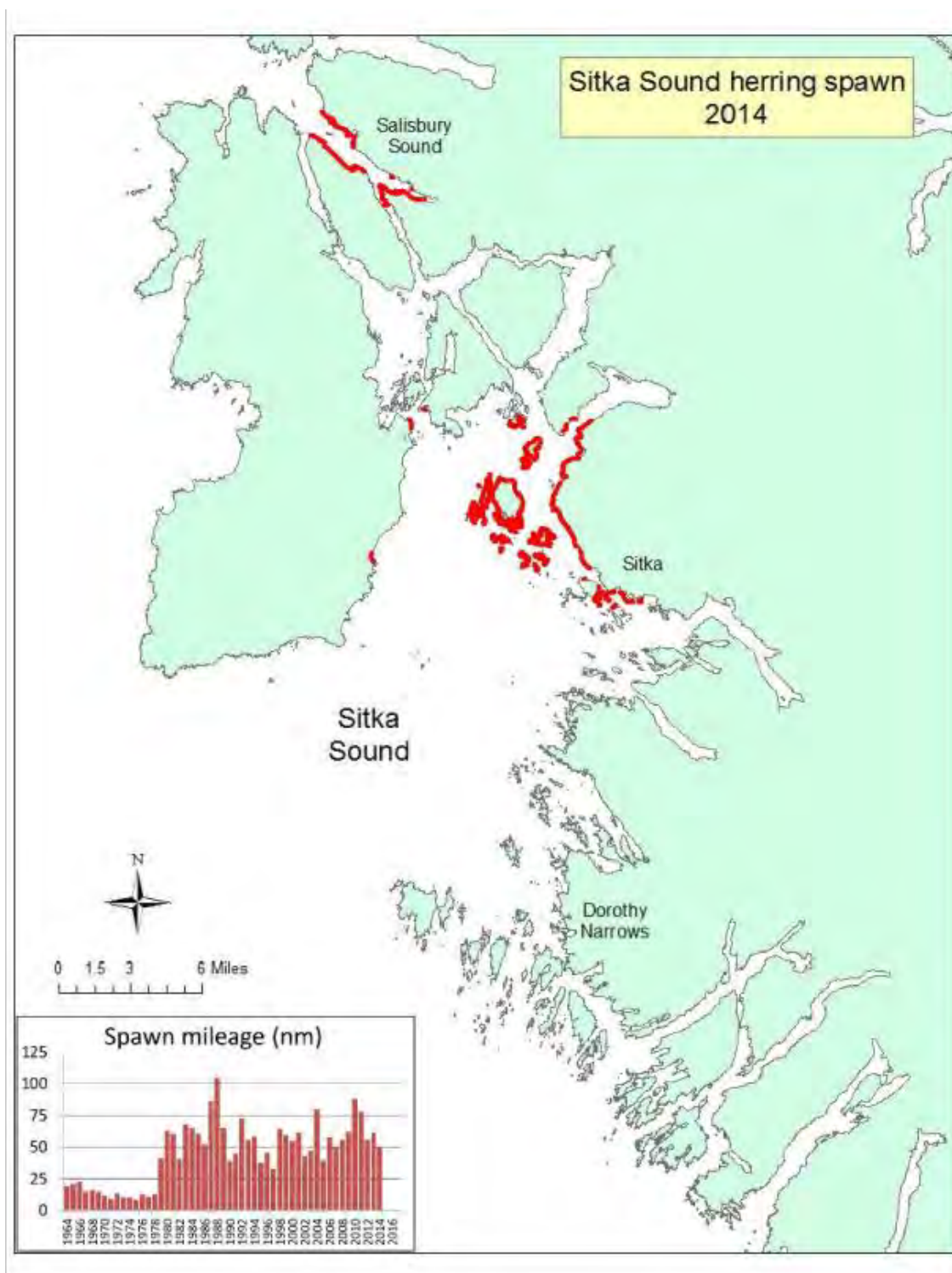


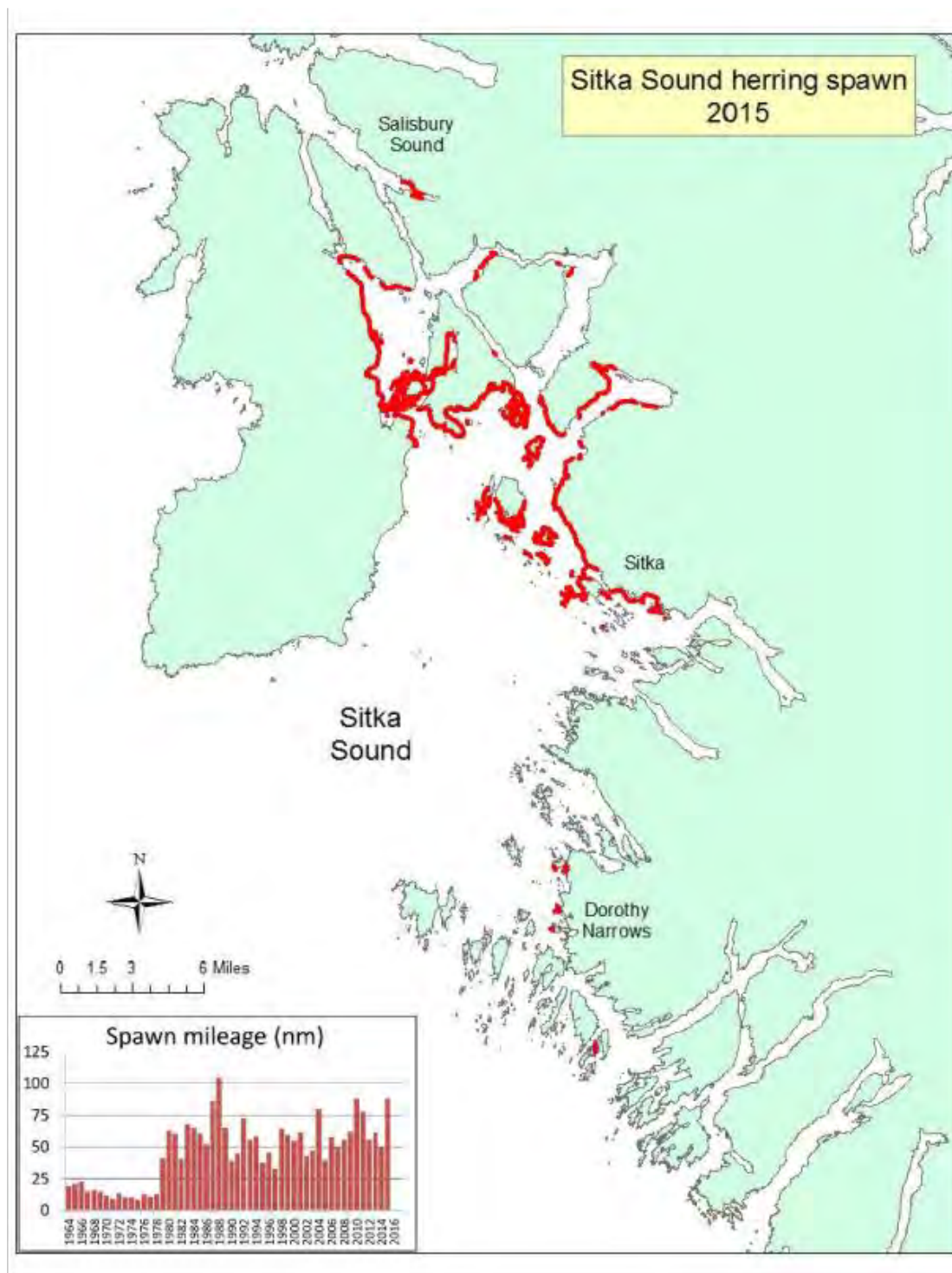


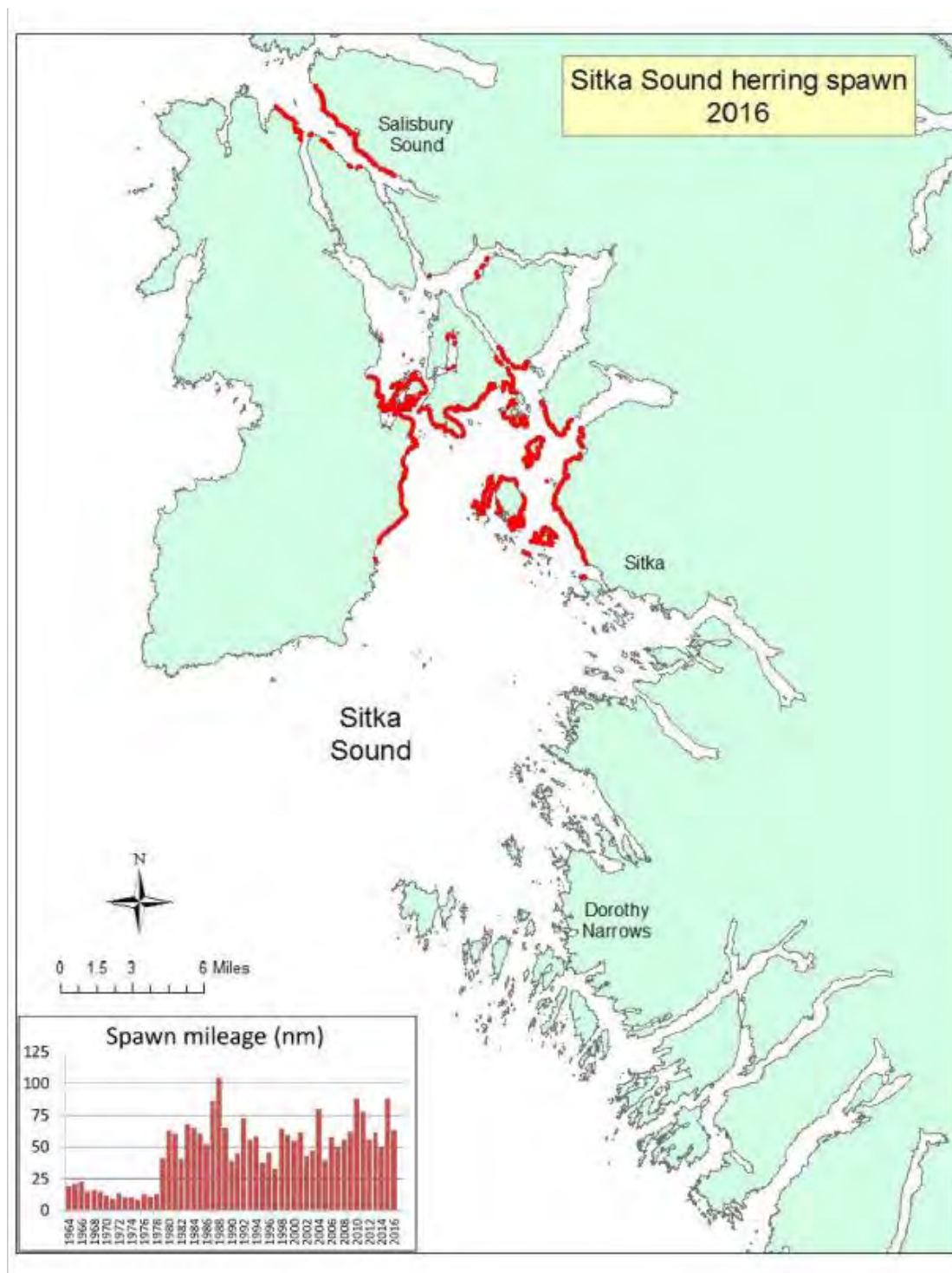


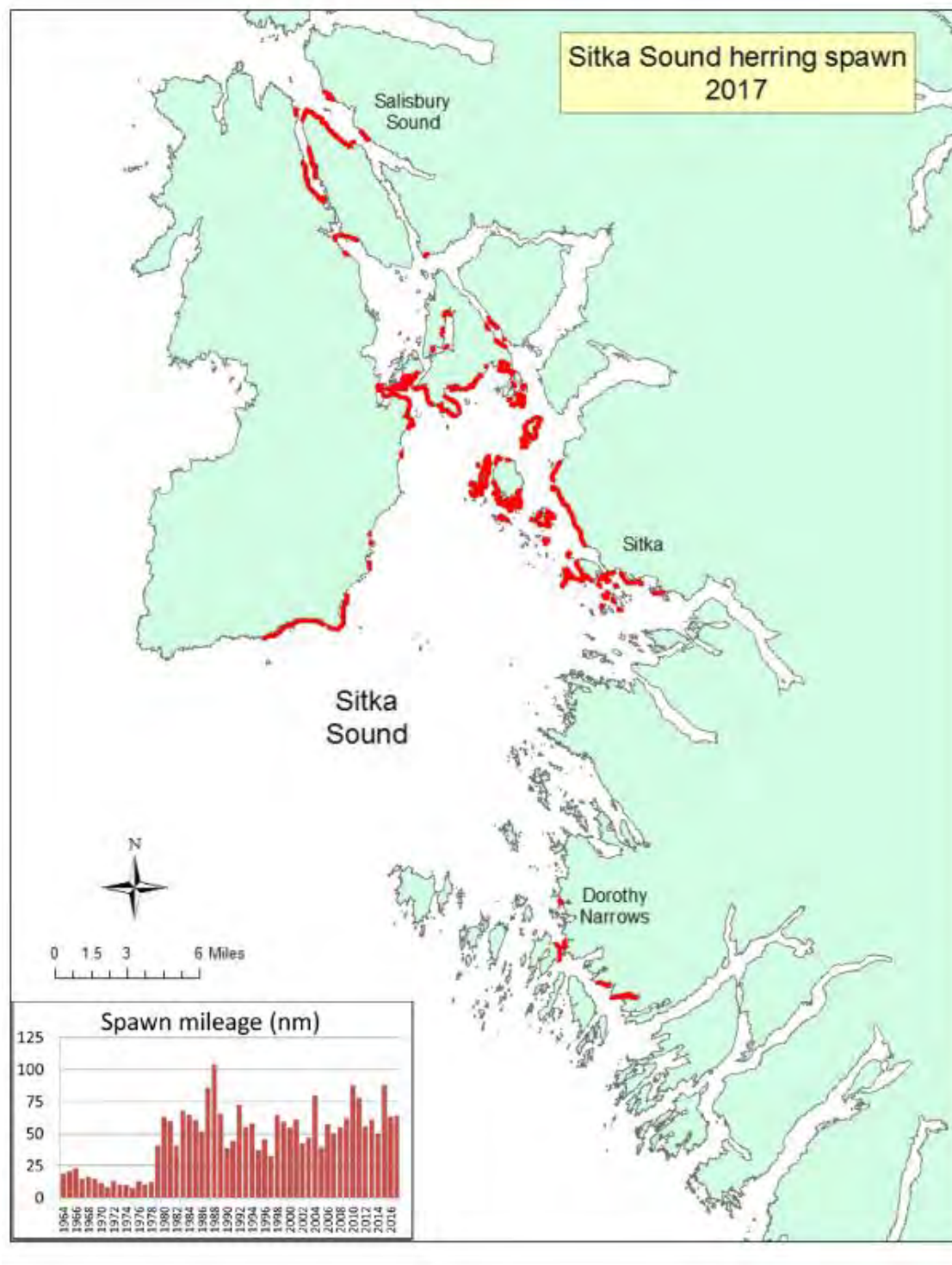


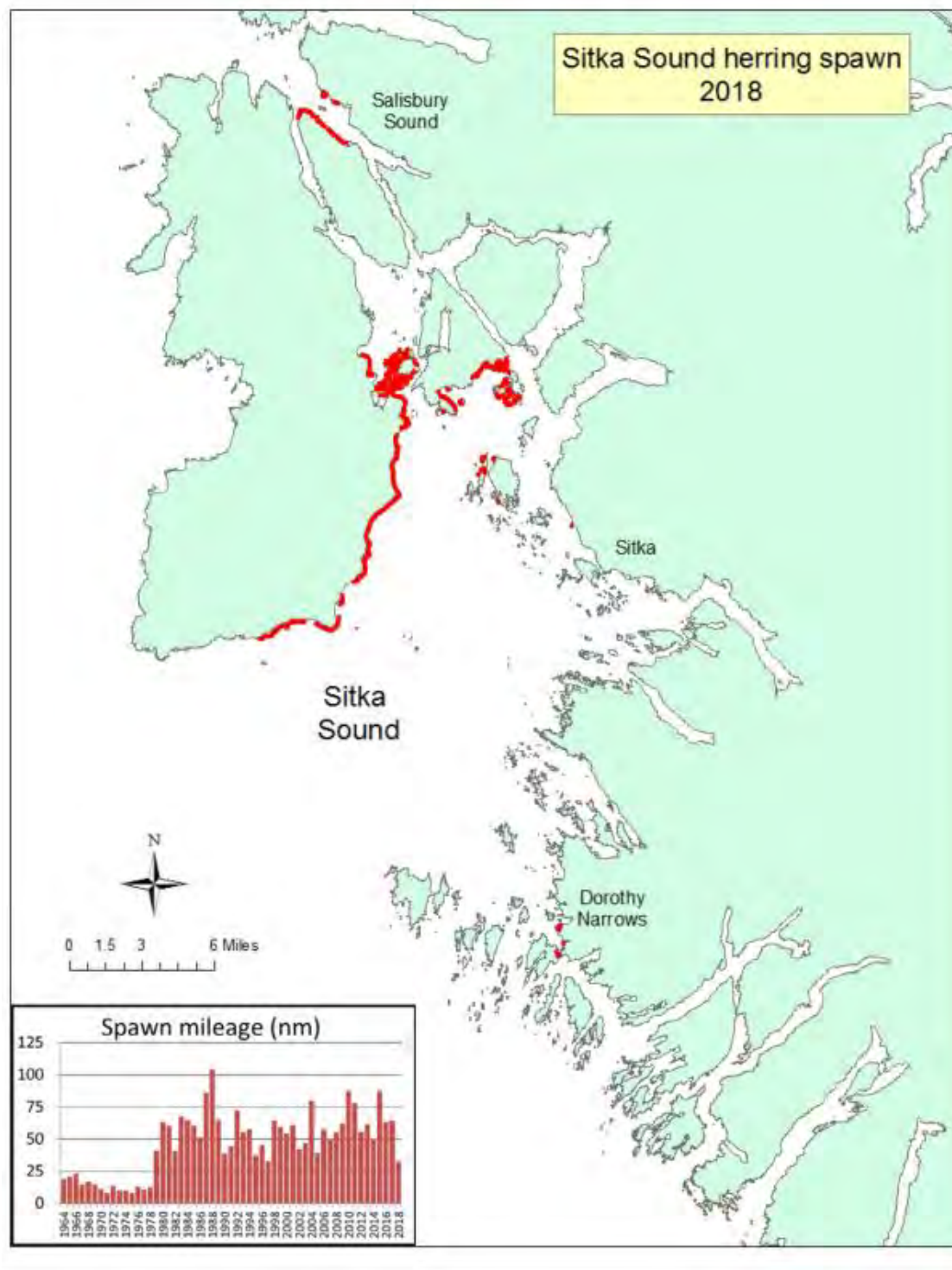


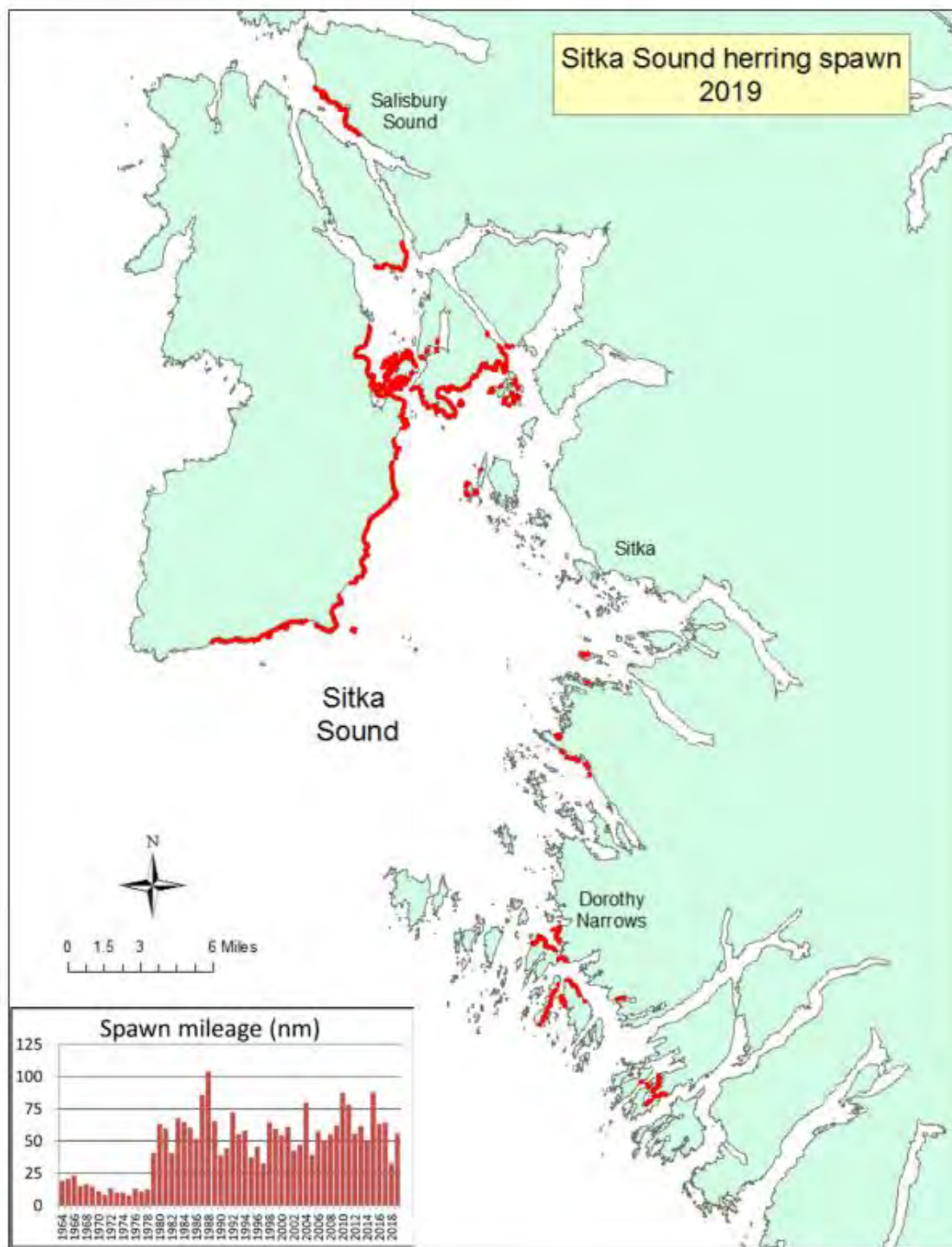












RE: ACR 4 Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass (5 AAC 27.160).

Members of the Board of Fisheries, This proposal was heavily discussed and debated in the last SE Alaska board cycle, and has no business being addressed out of cycle. In addition there has been little to no harvest due to market conditions in the last 2 years effectively nullifying argument that the commercial fishery is adversely effecting the subsistence harvest. Herring stocks in Sitka Sound are at historically high levels and are stable and well managed. This proposal has no basis in scientific fact or management science and is purely emotional and politically motivated. The only place a political and allocative proposal such as this belongs is within board of fisheries standard 3 year cycle. Thank You, Thomas Nelson



Mailing Address: PO Box 20229, Juneau AK 99802-0229
Physical Address: 410 Calhoun Ave Ste 101, Juneau AK 99801
Phone: (907) 586-2820 **Fax:** (907) 463-2545
Email: ufa@ufafish.org **Website:** www.ufafish.org

October 2, 2019

Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Submitted VIA: Alaska Board of Fisheries Comment Website

RE: Opposition ACR 4

Dear Chairman Morisky and Board of Fisheries Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

UFA opposes ACR 4 which seeks to reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass.

UFA supports the continued sustainable, science-based management of fisheries. Fishermen depend on Alaska Department of Fish and Game (ADF&G) data analysis, sound management, and the ASA herring model for a healthy and sustainable herring stock in Sitka Sound. The department has conducted outside peer review of its ASA model by the University of Alaska and the leading University of Washington fishery modeler Andre Punt. UFA believes ADF&G's Sitka Sound herring stock assessment is based on fundamental scientific principles, good data and peer review.

ADF&G's commitment to precise biomass estimates is further shown in their current research project to determine the maturity at age composition of the Pacific herring in Sitka Sound using scale samples.

The Sitka Sound commercial sac roe herring fishery is under a constant microscope and UFA trusts the ADF&G's scientific approach to ensure the fisheries' sustainability and maximum potential to all users.

Sincerely,

Matt Alward
President

Frances H. Leach
Executive Director



September 26, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526

Chairman Morisky,

The Aleutians East Borough is a Second Class Borough of the State of Alaska encompassing six local communities: Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon and Sand Point. The Alaska Peninsula Salmon Management Area M is largely within our Borough boundaries and Area M salmon management regulations, including for the Dolgoi Island area, impact all of our residents. The Aleutians East Borough urges the Board not to accept Agenda Change Request (ACR) #5 that seeks to further curtail commercial salmon fishing in the Dolgoi Island area of the South Alaska Peninsula region. This issue was fully adjudicated by the Board at your February 2019 meeting to a satisfactory result. The ACR is not warranted. In addition we are extremely disappointed in some of the misleading and inaccurate statements alleged in the ACR.

The February 2019 Alaska Peninsula/Aleutian Island/Chignik Finfish meeting of the Alaska Board of Fisheries included discussion of proposals 137, 138 and 139 that recommended specific changes to the Dolgoi Island area salmon management. Three other proposals, 134, 135 and 136 related to the fishery were also discussed. Two main regulatory changes to South Alaska Peninsula June salmon management resulted from the meeting. 1) June fishing schedules for all salmon fishing gear groups were realigned, resulting in 72% more hours of fishing closures with no salmon fishing gear in South Alaska Peninsula waters during June. 2) The Dolgoi Island area was completely closed to purse seine fishing gear in June.

We agree with ADFG Commissioner Doug Vincent-Lang in his July 10th denial of the Chignik Intertribal Coalition's Emergency Petition when he stated "it appears the regulatory change was successful in reducing harvest of sockeye salmon in those sections". It is not accurate to say that South Alaska Peninsula fishermen do not share in the burden of conservation of Chignik-bound sockeye salmon - they do. In addition to the new 2019 regulations, it should be noted that the Southeastern District Mainland section of the South Alaska Peninsula remained closed for the entire 2018 salmon season and did not open until August 15th in 2019.



The dismal 2018 Chignik salmon season was concerning to South Peninsula fishermen. The fishermen recommended the February 2019 regulatory changes. And 2019 has been more promising. While the 2018 total Chignik escapement was only 70% of the preceding 10-year average, the 2019 escapement reached 87% of the prior 10-year average and in the 2019 commercial fishery, Chignik Management Area L fishermen harvested over 3.4 million pounds of sockeye, over 1.4 million pounds of coho and over 6.9 million pounds of pink salmon.

We ask the Board to reject ACR #5 at this time.

Sincerely,

A handwritten signature in cursive script, reading "Alvin D. Osterback".

Alvin D. Osterback, Mayor



From: [Ben Allen](#)
To: Tuesday, October 8, 2019 10:24:27
Subject: AM
Date:

Mr. Chairman and Members of the Board,

My name is Benjamin Allen and I am in support of ACR 5 which calls for the Board of Fisheries to impose a conservation assignment on the Dolgoi Islands Area fishery for Chignik sockeye salmon.

The ADF&G Area M management are prone to blindly follow regulations, foregoing common sense and not acting in a protective nature. The fact that a fishery that is primarily managed on time in area Doesn't have default safeguards in place is appalling. Area M was previously regulated off of a percentage of catch of stocks they intercepted, giving at least a degree of responsibility of conservation.

We have constantly asked the ADF&G to reduce fishing time in the area when we are unable to fish due to lack of escapement, and their response has always been, "you must change the regulations in order for us to act, we understand what you are looking for but are bound to just follow regulations".

To give an accurate understanding the lack of safeguards please refer to ADF&G's own special publication 19-07, where all of the South Peninsula escapements were well below the SEG, yet the department chose to allow commercial fishing to proceed unencumbered on time in area. For your ease I have put a quote from this publication.

(Special Publication 19-07)

Run Forecasts and Harvest Projections for 2019 Alaska Salmon Fisheries and Review of the 2018 Season

Edited by
Richard E. Brenner, Andrew R. Munro and Sabrina J. Larsen

Alaska Department of Fish and Game
March 2019
Divisions of Sport Fish and Commercial Fisheries

"Run and Escapement Summary

The Orzinski Lake sockeye salmon record low escapement of 2,817 was well below the SEG of 15,000–20,000 sockeye salmon. The South Peninsula sockeye salmon escapement of 12,017 was well below the management objective range of 48,200–86,400. Escapement into Mortensens Lagoon (1,200) was well below its SEG range of 3,200–6,400. Escapement into Thin Point Lagoon (1,000) was well below the SEG range of 14,000–28,000. Reports of later-than-average subsistence harvest of sockeye salmon suggest that some sockeye salmon escapement may have occurred after the peak surveys were completed and sockeye salmon escapement is likely slightly higher than was observed.

The sockeye salmon escapement for 2018 in the Northwestern District was below the escapement objective range of 52,600–106,000, with a total escapement of 45,750.

The 2018 North Creek salmon escapement of 8,300 sockeye salmon met the escapement goal of 4,400–8,800."

I believe the state resource should be protected as a default, as it was intended, it no longer seems to be the case with the Area M fishery. The ADF&G cannot prevent ocean conditions that negatively impact the salmon run but they can curtail a fishery that may be potentially doing damage to the state resource. It is not equitable for Chignik to only hold the burden of conservation.

The Chignik river system is frequently the leading stock intercepted in Area M when looked at as Bristol Bay is not a single stock, but comprised of nine different river systems that are being intercepted from. To not have some type of protective default regulation for the Chignik river system it will continue to collapse more than it already is. Chignik fishery, Area L in 2019 had a disastrous first run and a mediocre second run. Between 35 and 45 vessels were fishing at any given time which is a dramatic reduction from the standard 75 permits that are usually fished in Area L. Fishermen are leaving the area, finding new areas to lease or buy permits in due to the



instability of the fishery. The conservation is coming on the backs of the permit holders in Area L. Until there is absolutely no fishing in Area L the ADF&G management does not take any measures to reduce fishing in its current management of Area M. Area M fisherman do not understand what is happening to the resource in Chignik as there is no consequential management until the resource heads to becoming a stock of concern.

In closing, the load of conservation in Chignik has now affected the yield that is produced in area L to the degree that the fishermen are having a difficult time surviving and just because we are the last stop on the way to the lake system does not mean that we should not have equal usage or conservation to the state resource. Please give us the opportunity to address this difficult situation in a board meeting and allow ACR 5 to come to the table.

Best regards,
Benjamin Allen



RE: ACR 5 Close the Dolgoi Islands area commercial salmon fishery when harvest reaches 191,000 sockeye salmon (5 AAC 09.365, 5 AAC 09.366).

For the past two years, early run sockeye escapement goals have not been met in Chignik. These terrible sockeye returns permeate every aspect of our lives in the Chignik villages. The economic impact of our local sockeye fishery failing has trickled down through the entire Chignik region. Everyone feels the impact – our Borough, our city, our tribes, and every individual in our communities, whether they are fishermen or not. We all depend on the local salmon fishery made up of the early and late sockeye salmon runs to the Chignik River system. For decades, Chignik area fishermen have shouldered an inequitable conservation and economic burden caused primarily by the Area M intercept sockeye fisheries on the south side of the Alaska Peninsula. These interception fisheries routinely pick off significant percentages of Chignik-bound sockeye salmon. ACR 5 presents a way for the Board to address this issue. The Board is well aware that under Alaska's mixed stock policy, when it is necessary to restrict fisheries on stocks where there are known conservation problems, the burden of conservation needs to be shared among all fisheries in close proportion to their respective harvest on the stock of concern. Since 2016, perhaps in awareness of this policy, the Board has recognized that Chignik needs protection, and has slowly restricted Area M sockeye fisheries in order to address this inequity. But the Board's intermittent actions are not enough. Simply managing the Chignik early and late sockeye runs "to achieve a level of escapement that is not the worst on record," as ADFG has admitted it does for Chignik, is not an acceptable management strategy. Chignik has no fallback. Salmon fishing is Chignik's lone industry. If our sockeye runs fail, so will our communities. Current regulations that allow interception fishing in Area M need to be changed so that all Area M fishers harvesting Chignik-bound sockeye share responsibility for ensuring resource sustainability and stock conservation on Chignik-bound sockeye. It is inequitable to place the full conservation and economic burden of a poor sockeye return entirely on the Chignik fleet while not imposing similar burdens on Area M fleets that harvest the same stock. ACR 5 presents a way for the Board to address stock conservation and sustainability for migrating sockeye stocks. Current regulations are grounded on the presumption of healthy and unlimited stocks. But, if what Chignik saw in 2018 and 2019 is the new normal, sockeye management plans need to be updated to ensure responsible resource stewardship and reasonable sharing of the wealth during strong and weak runs alike. And, the Board needs to address these issues not just when stocks are low, weak, or destitute. Our goal is to ensure conservation, protection of customary and traditional subsistence uses, and the sustained economic health of Chignik's fishing communities. But, we need the Board's help in order to realize this goal. George Anderson, President, Chignik Intertribal Coalition

RE: ACR 5 Close the Dolgoi Islands area commercial salmon fishery when harvest reaches 191,000 sockeye salmon (5 AAC 09.365, 5 AAC 09.366).

Mr. Morisky and Board of Fisheries members: Concerned Area M Fishermen (CAMF) is an organization representing salmon drift permit fishermen who fish on the Alaska Peninsula. CAMF does not support adoption of Agenda Change Request (ACR) #5 submitted by the Chignik Inter-tribal Council because we feel it meets none of the criteria the Board of Fisheries has established for consideration of fishery issues out of the normal regulatory cycle. The authors of the ACR acknowledge it doesn't "correct an error in regulation", nor does it "correct an effect on a fishery that was unforeseen when a regulation was adopted" which are two of the three possible criteria for calendaring an issue out of cycle. The authors do claim there is a "conservation" issue regarding the early Chignik sockeye return that merits the Board's attention before the next regular meeting. CAMF disagrees with this claim. The early Chignik sockeye escapement goal is a Biological Escapement Goal (BEG) with a range of 350-450,000. The 2019 escapement, per ADF&G, was 345,918 sockeye--only about 4,000 fish below the bottom bound of the goal. However, it is important to note that a BEG is a YIELD goal, not a conservation goal, and that the range of the BEG is a "best guess" of the range that will produce the maximum sustain yield (MSY) to the stock. Failure to reach the bottom the BEG bound may affect the future yield of the stock, but this is not a conservation or sustainability issue, and therefore, in our opinion, does not satisfy the ACR criteria.. CAMF believes the Chignik/South Alaska Peninsula issues were thoroughly vetted at the Board's February 2019 meeting. There is no compelling new information. The subject matter of this ACR and it's request are more properly considered in a proposal for consideration during the normal Board's normal regulatory cycle. Thank you for your consideration, Steve Brown, President Concerned Area M Fishermen Homer, Alaska.

RE: ACR 5 Close the Dolgoi Islands area commercial salmon fishery when harvest reaches 191,000 sockeye salmon (5 AAC 09.365, 5 AAC 09.366).

From: Dean Anderson area L permit holder To: Chairman Reed Morisky and fellow Board members. Please support ACR#5 for the conservation and economic viability of the Chignik region. Sharing the burden pays dividends As area M benefits wen Chignik has strong sockeye runs so this issue of making sure Chignik gets its escapement should be a priority. Chignik does not get scheduled time and area and Sharing the burden when Chignik is having severely small sockeye returns should automatically restrict fishing in areas where larger concentration of Chignik sockeye pass in area M! Sincerely, Dean Anderson



Don Bumpas
P.O. Box 167
Chignik Lagoon, AK 99565



ALASKA BOARD OF FISHERIES

PO BOX 115526

JUNEAU, ALASKA 99811-5526

September 25, 2019

SUBJECT: Dolgoi Island Sockeye Fishery –ACR # 5

Dear Members and Chairman of the Alaska Board of Fisheries,



ACR 5 is grounded on ensuring Chignik sockeye escapements are met—it is not associated in the least with allocation. The Dolgoi Island fishery, which has a dubious historic standing, should be required to share in the burden of conservation on Chignik sockeye salmon in as much as the fishery, according to the ADF&G WASSIP study, is dominated by east-bound Chignik fish. If the Board were to think otherwise then it should make it clear in the Dolgoi Management Plan that this fishery has an entitlement on Chignik sockeye salmon and further, is absent of any and all obligations for assisting Chignik's escapements being reached and as such, is privileged. Frankly, I would have to find this highly counter to the Sustainable Fisheries Policy and think that the Board would similarly share this opinion.

Respectfully please address the importance of ensuring sustainability of Chignik two sockeye salmon runs. Do this by mandating in regulation that the Dolgoi Island fishery stand down whenever Chignik sockeye salmon escapement goals are not being obtained as similarly provided in the Igvak and SEDM fisheries plans. Thank you

Sincerely,

Donald L Bumpas



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

Edgar Shangin
P.O. Box 110574
Anchorage, AK 99511

Subject: Dolgoi Islands Area Fishery

October 7, 2019

Dear Alaska Board of Fisheries Members:

I strongly support Agenda Change Request # 5 that will be before you later this month. My reasoning is simple --- the Dolgoi Islands Area fishery has no regulation that addresses Chignik sockeye escapement requirements. This is a major oversight and needs to be corrected before next season. Conservation should stand as the number one priority in every Alaska fishery and that applies to the Dolgoi fishery.

F&G in their studies estimate that the Dolgoi fishery catches 99+% traveling sockeye salmon in June and July and of those, approximately one half are headed to Chignik. Because Chignik sockeye are the dominant stock, Dolgoi fishermen should be required to take responsible action to assist the Chignik runs meet their escapements. It would be right for everyone and especially the resource.

If case you are unaware, for the last two seasons the Chignik early sockeye run has not meet minimum escapement, and there is serious question as to whether the 2018 late run came in at escapement (local consensus is that silvers were miscounted as sockeye salmon by the F&G sonar).

Chignik needs to have healthy sockeye returns and without the right level of escapements it is not going to happen. The life-blood of our area is based on our two sockeye runs. There is no backup so please do not permit the Dolgoi fishery to remain open when Chignik sockeye escapements are not being reached.

Thank you for considering my suggestions.

Sincerely,

Edgar Shangin
Edgar Shangin



September 13, 2019

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

Elliot "Roger" Lind
PO Box
Chignik Lake, Alaska 99548

Subject: Dolgoi Fishery per ACR 5

Dear Board of Fisheries Members,

As a resident and life-long salmon commercial fisherman from Chignik Lake please do something to where the Dolgoi fishery shares in a responsible way for helping Chignik reach its red salmon escapement goals on both of its early and late runs. Do believe it very important that everyone work to provide needed escapements when they are involved in a fishery that is heavily weighted especially in the catch of Chignik red salmon. This seems most reasonable to me and in line with your policies for stock sustainability and conservation. While I do not like the Dolgoi fishery and do not believe it has much if any historic standing, I do recognize that fishermen from that fishery have far more influence with your Fisheries Board than us Chignik residents. Please Board see the issue for what it is-- Chignik red salmon escapements need to be met and it is not at all fair that we shoulder this need totally. Dolgoi fishermen seem to only care about intercepting as many as possible migrating Chignik reds. Please assign them some responsibility when Chignik is not meeting red escapements. Dolgoi fishermen have other areas to fish when Chignik is not meeting escapements. We Chignik fishermen have nowhere else to go. We want both Chignik red runs to be assured of meeting escapement more so than our desire to harvest them. Conservation has always been number one with us. Please help.

I thank you,



Ernie Carlson
FV Desperado
PO Box 21
Chignik, AK 99564



Alaska Board of Fisheries
Board Support Section
September 2019
PO Box 115526
Juneau, AK 99811-5526

Subject: ACR 5: Area M –Dolgoi Island Fishery/Chignik
Sockeye Escapement

Dear Alaska Board of Fisheries Members:

Respectfully I call your attention to ACR 5 that identifies the importance of the Dolgoi Islands Area fishery having a regulatory provision that helps Chignik reach its sockeye salmon escapements requirements, at least its minimums. The Department's WASSIP study shows that the dominate stock in the Dolgoi fishery is Chignik sockeye salmon and that local South Peninsula fish comprise less than 1% (ADF&G Special Publication No. 12-24 (2012)). The study further identifies that Chignik sockeye are more abundant than Bristol Bay sockeye, June through July.

As life-long Chignik commercial salmon fishermen, I find it disconcerting that Dolgoi is permitted to fish weekly through July subject only to a 191,000 sockeye cap when Chignik is not reaching its minimum escapements on its early and late-run sockeye salmon. It is not right that the Dolgoi fishery can operate untethered without a single provision to address stock conservation--- this should be corrected.

In respect for Chignik sockeye salmon, which again are the major stock component, the Dolgoi Islands Area fishery needs to stand-down when Chignik escapement shortfalls are evident. Precedent for such is provided in the Board's Sustainable Fisheries Policy which in part makes it clear that the burden of conservation is a shared responsibility across all fisheries. The Dolgoi Islands Area fishery should not be the exception.

I am,

Sincerely Ernie Carlson



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

Jacob Shangin
P.O. Box 112112
Anchorage, Ak 99511

October 3, 2019

Dear Fisheries Board,

Re: Burden of Conservation – Area M's Dolgoi fishery

I am a Chignik salmon fisherman of the Ivanof Bay Tribe and am seriously concerned with the expanding intercept fishing occurring in Area M's South Peninsula as it affects Chignik sockeye salmon escapements. In June and July the SP fishery is focused on harvesting salmon destined to Bristol Bay, Chignik, and Cook Inlet, mainly. During these months there is no management consideration given for stock conservation even though stocks of concern exist in Cook Inlet, and Chignik escapements which in recent years (2017-19) have barely been met and in some cases not achieved (Chignik's 2018 early and late runs, & 2019 early run). The exception on a conservation responsibility in Area M is the SEDM fishery which has a Chignik allocation and is closed when Chignik is not meeting escapements. In 2017 the SEDM fishery was severely restricted, and in 2018 and 2019 the SEDM did not open due to weak Chignik sockeye returns. In those years, Chignik fishermen had no early run sockeye fishery, and no late-run fishing occurred last year, 2018.

In all aspects, Area M's Dolgoi fishery is a targeted interception fishery on Chignik sockeye salmon which is about 50% of the catch according to the Department. Logically, I believe that the Dolgoi fishery should be managed similarly to the SEDM area, and as such share in the responsibility for Chignik obtaining its sockeye escapements.

Chignik fisherman will continue to do their part in ensuring Chignik sockeye escapements are reached but your help is needed too. Board members please require Area M fishermen to do their fair share at least in the Dolgoi fishery. They should not be permitted to fish when Chignik is escapement deficient.

Sincerely,



Jacob Shangin

RE: ACR 5 Close the Dolgoi Islands area commercial salmon fishery when harvest reaches 191,000 sockeye salmon (5 AAC 09.365, 5 AAC 09.366).

Dear BOF member! Hello and greetings from Homer! My name is Jamie Ross, 38 year veteran Alaska commercial fisherman from Homer. I have fished numerous fisheries across Alaska, and have held a Chignik Salmon Seine permit since 1996. I would like you to consider changing the regulation in Area M regarding the "Dolgoi Island" area fishery. We have imposed caps and limits in this area to protect Chignik bound sockeye, but they still fall short if the Chignik fishery has no early run escapement. The WASSIP studies have shown that this area harvests extremely high numbers of Chignik Bound fish - in some years as high as 70-80%. This area is literally "just down the beach" from the SEDM (Southeast District Mainland) fishery where there is a harvest trigger, preventing fishing unless certain conditions are met with Chignik escapement. It makes no sense for Dolgoi, just a few miles away, to be fishing, when the SEDM restrictions are in place, and they are not allowed to fish! Similar restrictions in the "Cape Igvak" fishery have prevented this fishery from opening the last few years, when the Chignik early run has been so poor; so why should we allow the only fishery with such high harvest numbers of Chignik Bound sockeye to continue fishing, when both Cape Igvak and SEDM are closed down? It make no sense at all! Chignik early run escapement has been abysmal the last several years. If we have any hopes of rebuilding this portion of the run, or allowing Chignik fishermen to ever have a fishery in June, we need to take further actions to allow these fish to pass through Area M. Please consider ACR 5, and continue supporting the plight of Chignik Fishermen! Thank you very much! Sincerely, Jamie Ross Homer, AK 99603



September 25, 2019

Jason D. Alexander
213 Airport Road
Chignik, AK 99564
Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: Conservation Responsibility Needed—Dolgoi Fishery (ACR 5)

Dear Alaska Board of Fisheries:

My concern is that Dolgoi Island Area fishery is managed without regard to its impact on Chignik sockeye salmon even when Chignik is not meeting its escapement goals. While the Dolgoi fishery does have a 191,000 sockeye harvest limit, the fishery operates on a weekly schedule starting in early June and continues on irrespective of whether the Chignik sockeye runs are on their lips and the entire Chignik Management Area is closed to get enough escapement through the Chignik weir for F&G's escapement schedule. In 2018 and 2019 this was especially true. The entire Chignik area was closed to sockeye fishing for the complete season, and this year, 2019, the Chignik fishery remained closed through late July for early-run escapement which even then fell short of its minimum goal.

I was always understood that the number one management priority for Alaska's salmon resources is ensuring that escapement goals are reached and secondarily maximizing harvest potential to the highest benefit of the State. Certainly Chignik sockeye salmon are a public resource and do not belong to Chignik (Area L) fishermen or its local residents. If that were not true the Igvak and SEDM interception fisheries would be non-existent. Chignik, Igvak and the SEDM do rightly share, as detailed their respective management plans, a firm measure of conservation responsibility on Chignik's two runs. None of these fisheries are open when the Chignik runs are below escapement. The same should apply to the Dolgoi fishery as on average, per the WASIP study report, 50% of the harvest is Chignik sockeye salmon. That same study showed that local SP sockeye were less than 1%. The Dolgoi Island Area fishery should not have special rights to where the only major control on this fishery is an upper harvest limit. Correct this apparent oversight by having the fishery close when the Chignik runs fall below the escapement goals set by the F&G. This would put the fishery in line with the number one management priority for Alaska salmon resources.

Thank you

Respectfully,

Jason D Alexander
JASON D. ALEXANDER
(907) 717-5639



October 07, 2019

Dear Board of Fisheries,

My name is Matt Siemion, and I'm a second generation Chignik Fisherman and an Alaska Native. I've been fishing in Chignik since 1975 when I started fishing with my father at 12 years of age. A lot has changed in the Chignik fishery since then, and not for the better.

The 2017, 2018, & 2019 sockeye fisheries in Chignik have been a disaster, especially for the 1st run. The outlook for Chignik sockeye is dire. Area M, our "naughty neighbor" to the west, needs further restrictions in the Shumagin and Dolgoi Island fishing areas; these areas do not share in the conservation burden, and they are habitually allowed to harvest fish regardless of the escapement numbers associated with the migrating stocks they are harvesting: Chignik, Kodiak, and Cook Inlet (per WASSIP). In 2018, Area M was restricted because the Chignik escapement was less than half of the bottom escapement objective, but future, board ordained restrictions are warranted. As was seen in 2019, Chignik fishermen sat on the beach and were unable to terminally harvest returning sockeye salmon, as Area M continues to fish target non-local, migrating sockeye in the Shumagin and Dolgio fishing areas.

One observation is that it has been noticeable that the first and second runs arrive to Chignik in irregular patterns in relation to what the historic norm has been. The fortunate fish that do arrive have gillnet marks and often lack diversity in size and fecundity, since they have been targeted by gillnets with a set mesh size. For example, one day the fishing in Chignik is good and uniform throughout the tide, and the next day it is spotty and unbalanced. Historic catch patterns are nonexistent. In short, what I've noticed is that as the South Peninsula and Kodiak get better at targeting Chignik bound sockeye, those lucky fish that do make it back to Chignik waters arrive in non-historic patterns: spotty catches, gillnet marked fish, and erratic size, sex, and weight.

I respectfully request that the Board of Fisheries to further restrict commercial fishing in the Shumagin and the Dolgoi Island fishing areas of the South Alaska Peninsula until the Chignik early and late sockeye salmon run minimum escapement numbers have been achieved. The justification is strong. Such action is required for the conservation of Chignik bound early-run and late-run sockeye salmon; Area M needs to share in the conservation burden of Chignik sockeye. It is common knowledge that the Shumagin Islands and Dolgio Island areas are a well-established late-June and July migration corridor for Chignik sockeye per the Department's three-year WASSIP Investigation (2006-08). In that study for 2006 Chignik sockeye salmon comprised 67.0% of the July or post-June catch, in 2007 37.2%, and in 2008 47.3%.

Please join in the effort to protect the Chignik sockeye salmon fishery.

Sincerely, Matt Siemion



Norine Jones
111 Airport Road
Chignik, Alaska 99564

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

September 25, 2019

Re: ACR 5

Dear Members of the Alaska Board of Fisheries:

My family has commercially salmon fished Chignik for 50 years. We have had good years, mediocre years, and poor one but never like the one two years ago in 2018. Our seiner, F/V Islander, was tied up to the dock for the entire season. Everything went for escapement on both the early and late Chignik runs in 2018, and the other local salmon species were of insignificant run strength for any measurable harvest. This year, 2019, our boat did not fish until the very end of July due to a weak Chignik early run where every sockeye was needed for escapement. Even then the minimum goal on the early Chignik run was short by several thousand. Ironically if we had an Area M seine permit we could have been catching migrating Chignik sockeye absent of any measurable constraint in both years with weekly openings and a wide range of fishing areas available. It's simply not right that Area M fishermen SP fishermen are allowed to exploit non-local sockeye salmon without any conservation responsibility. This needs to stop. Area M fishermen should be held accountable and when a migrant stock is weak on escapement they need to stand-down the same as required in terminal stock fisheries.

ACR 5 addresses the Dolgoi fishery, which per the Department's genetic analysis (WASSIP study), catches 50% Chignik bound sockeye salmon. This fishery clearly operates void of any conservation assignment. Requested is that when Chignik is escapement deficient the Dolgoi fishery stays closed the same as standard in the Chignik Management Area. Now that would be fair!

Sincerely,

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

Patrick E. Kosbruk
P.O. Box 110
Perryville, Alaska 99648

Subject: Dolgoi Fishery -- ACR 5

October 2, 2019

Dear Alaska Board of Fisheries,

As a Perryville Village resident and Chignik commercial salmon fishermen I am deeply concerned that an Area M fishery specifically the Dolgoi Island Area fishery has absolutely no requirement to participate in the sharing of the burden-of-conservation on Chignik-bound sockeye salmon. This fishery according to WASSIP is entirely an interception fishery on non-local sockeye salmon with Chignik early and late run sockeye averaging about 50% of the harvest. Conservation should be a basic regulatory requirement in every fishery and the Dolgoi fishery should not be exempt.

Chignik should not have to solely bear the burden of conservation. It is not acceptable that Dolgoi in particular can fish on the Chignik sockeye runs regardless of their escapement status when I as a boat and permit holder am required to stay on the beach when the Chignik runs are not achieving escapements.

In ACR 5 it all about fairness and resource conservation, and it has nothing to do with allocation. This is unless one were to arrogantly believe that only the people of Chignik including my village of Perryville are entirely responsible for ensuring that the Chignik sockeye runs achieve proper escapements for them to remain healthy and productive for generations to come. Such a responsibility can't be achieved without Area M including the Dolgoi Islands Area fishery being restricted from fishing on east-bound Chignik fish when there are sockeye escapement problems in the Chignik River system.

Humbly, I request that the Board acknowledge the need for Dolgoi to share in the burden-of-conservation on Chignik sockeye salmon and accordingly, take action in support of ACR 5.

Sincerely,

Patrick E. Kosbruk

Paul Johnson
776 Chignik Road
Chignik, Alaska 99564



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

September 24, 2019

Subject: ACR 5

Dear Alaska Board of Fisheries:

As a Chignik commercial salmon fisherman I ask that you seriously consider ACR # 5 which requests that the Dolgoi Island Area fishery be required to address its impact on Chignik sockeye salmon from a conservation standpoint.

It is no secret that the Chignik sockeye salmon runs which there are two are having problems even to the extent, in some years, of not even meeting minimum escapements. This year, 2019, was no exception as the Chignik early sockeye run not only did not support a fishery but also fell short of meeting minimum escapement. In the previous year, 2018, Chignik reached an historic low as we had no sockeye fishery at all as everything was needed for escapement. In both years Kodiak's Cape Igvak and Area M's Southeastern District Mainland were closed for Chignik sockeye salmon conservation. However, Area M seine and gill net fishermen in the Dolgoi Islands were permitted to fish even though it was known from the WASSIP study that Chignik-bound sockeye salmon not only migrate through the Dolgoi Islands but are the dominate stock comprising on average 50% of the catch.

As spelled out in ACR #5, the Dolgoi management plan should be amended to where that when Chignik sockeye are not meeting escapement the area is to be closed. This would be fair to those that depend on the two Chignik sockeye runs for commercial, subsistence and personal use fishing but more importantly, for the sake of resource conservation and sustainability.

Thank you for considering my comments.

Sincerely,

RE: ACR 5 Close the Dolgoi Islands area commercial salmon fishery when harvest reaches 191,000 sockeye salmon (5 AAC 09.365, 5 AAC 09.366).

Mr. Chairman and Members of the Board, Please hear ACR #5, submitted by the Chignik Tribal Coalition, and adopt it as a Proposal. The situation in Chignik leading to a disaster declaration in 2018, and again in 2019, a failing first run which provided no fishing opportunity in June is most likely not over. The impacts will reach at least into 2023 and 2024 which are likely the returns from 2018 and 2019. Chignik is under a tremendous burden just trying to recover from 2018. To delay a precautionary approach would potentially harm Chignik. We are at a point where we must work to stabilize the run strength and fishery and economy in Chignik. ACR #5 will aid in the endeavor and Dolgoi is a well-documented area to accomplish that. Of course, if the health of the runs return, this ACR will then have no effect and would remain dormant. But if there is need of escapement it would be a proactive approach to adopt with the uncertainty of future years run strength in Chignik. About 30% of the permitholders left for other fisheries in 2019. Families are having to relocate out of the area to find work to pay mounting bills. Traditional fishing areas were never opened in 2018 and 2019 because of poor quality of returns. Now is not the time to take a wait and see approach. Please put safeguards such as this one in place as protection against further decline of the sockeye runs in Chignik. Sincerely, Raechel Allen

Stephen Shangin
8840 Washburn St.
Anchorage, AK 99502



PC064
1 of 1

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

October 4, 2019

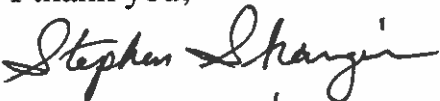
Subject: Conservation of Chignik Sockeye---ACR # 5

Dear Chairman and Members of the Alaska Board of Fisheries,

I ask that you support ACR 5 which calls for the Dolgoi June and July fishery to provide relief to Chignik's early and late sockeye runs by not allowing fishing when the Chignik's escapements are below the minimums set by F&G for MSY.

Currently the Dolgoi area is open regardless of how Chignik's escapements are fairing, and this is not right. Dolgoi should be held to the same standard as the neighboring Southeastern District Mainland area which is managed on Chignik sockeye salmon to where there is no fishing if Chignik escapements are not being met. Since the Dolgoi catches average 50% Chignik sockeye salmon the fishermen from that area have an inherent responsibility to be conservative to where they help Chignik reach its sockeye escapement requirements. Hopefully Board members and chairman you will agree and take positive action on ACR 5.

I thank you,


Stephen Shangin



RE: ACR 5 Close the Dolgoi Islands area commercial salmon fishery when harvest reaches 191,000 sockeye salmon (5 AAC 09.365, 5 AAC 09.366).

To the Chair and members of the State of Alaska Board of Fisheries; I am writing in support of ACR 5, which as you know pertains to the lack of shared burden of conservation in the Dolgoi Island fishery in the South Alaska Peninsula where specifically Chignik and other East of WASSIP stocks are of concern. In all fairness, and lack thereof, the rules governing fisheries, in this case S. AK. Pen. And Chignik are and have been since the 2004 S. AK. Pen. Management plan opened the Dolgoi Is. area to commercial harvest, taking from Chignik bound sockeye stocks at a level that is UNSUSTAINABLE. As was evident in 2014, 2018, and 2019, granted in 2019 minimum escapements in Chignik were believed to have been met commercial fishing could not begin until LATE JULY due to lack of escapement. And as you know the Chignik sockeye fishery traditionally commences in JUNE. ACR 5 proposes a shared burden of CONSERVATION, for the escapement of the dwindling sockeye runs in Chignik. If you look at me straight in the face and say its ok to shut down my fishery in Chignik for the reason of escapement goals- for the longevity of the resource, yet say theres no problem letting setnet, drift, and seine fleets in the S. AK. Pen. with killing power that dwarfs the Chignik seine fleet constantly fish on known Chignik bound sockeye, then you are exercising an evident bias in favor of the S. AK. Pen. Fishing fleet. ACR 5 is even more crucial with the recent expansion of effort in the S. AK. Pen. With the addition of a new processor and its fleet adding to the enormous harvest capability already present. Timothy Murphy

TO ALASKA BOARD OF FISHERIES

P.O. Box 115526

JUNEAU, AK 9981-5526



PC066
1 of 1

19

FROM WALLACE W. HINDERER

P.O. Box 13

CHIGNIK, AK 99564

DEAR MEMBERS OF THE AK BOARD OF FISHERIES,
I AM IN FAVOR OF ACR #5, IN HOPES THAT
IT WILL BECOME A PROPOSAL AND BE CONSIDERED
BY THE BOARD OF FISHERIES.

THIS PROPOSAL WOULD ACTIVATE ONLY
IF CHIGNIK SOCKEYE RUNS FALL BELOW
ESCAPEMENT REQUIREMENTS,
THAT WOULD PRECLUDE A SOCKEYE
FISHERY AT CHIGNIK. THIS WOULD
IMPOSE SHARING OF CONSERVATION BY ALL
USER GROUPS OF CHIGNIK SOCKEYE. THE
ACTION WOULD HELP STABILIZE THE
SOCKEYE RESOURCE AT CHIGNIK

THANK YOU FOR CONSIDERING
THESE THOUGHTS

Wallace W. Hinderer



William M Jones
11 Airport Road
Chignik, Ak 99564

Sept 27,2019

Re:ACR 5

Dear Members of the Alaska Board of Fisheries:

I am a four generation Commcerical salmon Fishermen in Chignik, Alaska. I am 42 years old and been fishing since I was 11, first as a skiffman and the last 15 years as the Skipper of the F/V Islander, my parents boat.

I have never experienced seasons like the last two, last year we did not even get a change to fish soceye because of no excapement, this year we did not start fishing until the end of July because of poor excapement on first run fish, I remember my dad talking about sitting on the beach to let the first run build up for lack of exc apement.

We know those fish comming from Area M are Chignik bound fish, all the while we are sitting on the beach Area M is fishing. This is wrong!



I have a lot invested along with my parents and have two boys coming up that want to be able to fish in the future. We will not be able to if future seasons keep going the way the last two years have been.

We are only asking the Board to put regulation in place so Chignik Area fishermen can harvest genetically recognized Chignik Salmon.

Please pass ACR5. This is a fair solution to a problem that has been going on for years.

Respectfully yours,

William M. Jones




4241 21st Ave W • Suite #302 • Seattle, WA • 98199
Ph: 206-462-7690 • Fax: 206-213-5272 • www.alaskaseafoodcooperative.org

October 7, 2019

Mr. Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: ACR 6: Close Aleutian Islands waters west of 174° W long to commercial fishing by certain vessels using nonpelagic trawl gear (5 AAC 28.650).

Dear Chairman Morisky:

We are writing to you today in response to ACR 6 that was submitted by Linda Kozak on behalf of the F/V Alaska Trojan. We agree with the ADF&G staff comments on ACR 6 and request that the Alaska Board of Fisheries (BOF) not take up this topic as it is not responsive to the policy for changing a BOF agenda under 5 AAC 39.999. We would like to inform the BOF that efforts are well underway to address the concerns raised by the submitter and that we have been actively working with all of the golden king crab fishery participants in recent years to educate each other on our respective fisheries and reduce gear interactions. Lastly, we would like to take this opportunity to clarify several of the points raised in the ACR.

The Alaska Seafood Cooperative (AKSC) members comprise the majority of trawl catcher processors that participate in the Aleutian Islands groundfish fisheries. Since 2015, the AKSC has formally coordinated with participants in the golden king crab fishery to disseminate gear locations and share information so that active and stored golden king crab gear can be avoided. In recent years, our information sharing protocols have evolved into a system that requires only one e-mail message be sent to a Google Group e-mail address that automatically routes the information to ASC and non-ASC member vessels who fish in the Aleutians. While not perfect, this system has greatly reduced the number of interactions on the fishing grounds that we share.

Gear interactions are costly to both sectors and can raise significant safety concerns for our fishermen so they do everything they can to avoid crab gear. That said, we believe our system can be improved to further reduce interactions and we are actively working with all crab fishery participants and ADF&G staff to identify improvements that can be made. ADF&G staff attended our most recent meeting in September of this year to discuss the crab survey and, in the future, they will be making survey locations available to the groundfish sector to avoid interactions between our fisheries and the survey.

As noted by ADF&G staff, about 99% of our groundfish fishing occurs in federal waters, but for the portion that does occur in state waters, 5 AAC 39.167 extends groundfish closures into state waters. The groundfish fleet is also subject to Steller sea lion closures in both federal and state



waters under 5 AAC 28.087. Additional closures would further limit where our vessels can operate and may contribute to additional gear interactions with the crab fleet. We would also like to note that all trawl catcher/processors that operate in the Aleutian Islands are required to carry two federal fishery observers at all times so our fishing activity is 100% monitored.

The gear we use has evolved substantially reducing bottom contact and impacts on crab and habitat. Vessels are not using 'roller or tire gear' as they once did. Vessels use modified gear that employs discs that are spaced out as well as doors that are lighter than those historically used, both of which reduce bottom contact and impacts. Use of this gear and our fishing footprint, which has been frozen for more than a decade, led the BSAI King and Tanner Crabs Fishery Management Plan and NMFS Habitat Division personnel to conclude that our fishery has minimal and temporary impact on golden king crab habitat.

We'd also like to note that the court's ruling on Amendment 113 (Aleutian Islands cod shoreside delivery requirement) had no effect on the timing or location of our fisheries. The court handed down its ruling March 21st of this year, after the March 16th closure of the federal A season cod fishery. Our participation in other federal fisheries in the Aleutians followed our typical pattern. While there may be some timing differences year to year, no significant changes in effort, timing, or location of our fisheries are likely due to the court order or any other factor in the foreseeable future.

We appreciate the opportunity to educate the BOF on our fisheries and the extent of our efforts to engage with the golden king crab fishery participants to ensure both fisheries operate as efficiently and safely as possible. We are confident that our continued coordination and communication will be effective at further reducing interactions and impacts on both sectors.

Sincerely,

Mark Fina, President
Alaska Seafood Cooperative

RE: ACR 6 Close Aleutian Islands waters west of 174° W long to commercial fishing by certain vessels using nonpelagic trawl gear (5 AAC 28.650).

ACR 6: SUPPORT This is a well-justified request and should be considered. Bottom trawl gear is among the most destructive and least selective gear types used in Alaska. Other gear types that do not damage bottom habitat, or arbitrarily harvest targeted species and bycatch alike, are available. We, as a state, should move towards these more selective, more sustainable gear types and abandon all bottom trawl gear.

Adak Community Development Corporation

October 8, 2019

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

Re: Comments ACR 7

Dear Chairman Morisky,

ACDC requests that the Board approve ACR 7 and schedule for action at the next meeting.

The Aleutian Islands state-waters Pacific cod fishery is a nonexclusive registration area. Initially this was due to the remote location of what was then a new fishery, as well as inconsistent processor availability which had sometimes resulted in an under harvest of the GHL. However, a shore-based processor in Adak started processing Aleutian Islands cod in 2017. Since that time, effort has increased and the GHL has been fully harvested by fishermen who have transitioned their fishing operations to Adak.

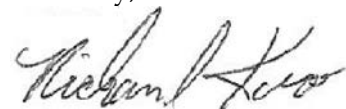
All other state-waters cod fisheries in the region are currently exclusive or super exclusive so this ACR will only align the Aleutian Islands regulations with the adjacent fisheries.

The size of the GHL in the adjacent Dutch Harbor state-waters cod fishery has expanded a number of times since it was first established in 2014. Despite having a 32 million-pound GHL in 2019, the Dutch Harbor cod fishery closed before the Aleutian Islands fishery (14 million-pound GHL) allowing for an influx of Dutch Harbor pot boats to enter the Aleutian Islands fishery mid-season to "double dip", creating a race for fish.

The proposed action will ease the continued erosion of opportunity for Aleutian Islands fishermen and Aleutian communities dependent on shorebased processing. The unexpected influx of new boats mid-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 processor in the region might close which would effectively eliminate cod fishing opportunity for most catcher vessels in the Aleutian Islands.

Thank you for considering our comments.

Sincerely,



Rick Koso, President
Adak Community Development Corporation
PO Box 1943 - Adak AK 99546

RE: ACR 7 Designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod (5 AAC 28.606, 5 AAC 28.647).

I am a jig vessel,f/v YORJIM, I participate in the Aleutian island cod fishery off and on for 12 yrs. I support the pot fishery being a exclusive state water fishery, but I and any other jig vessels would like to be exzempted from being include in this exclusive fishery. Most likely the state water cod fishery will be caught in the winter/spring time by pot, trawl, longline, and there will be no quota left for jigging in the summer. But if for some reason there is quota left, and a person goes out there in the summer, most likely a person would already have registered in Western gulf or Kodiak where they are already exclusive and you could not fish Aleutians in the summer when it is the only time a smaller vessel can fish in the Aleutians, Make it exclusive for pots, longline does not matter as there is no other state water longline, trawl does not matter as no other state water trawl, Jig vessel start in other area and move westerward as weather gets better and can not register in 2 exclusive area

Submitted By

Dan Veerhusen

Submitted On

10/8/2019 5:36:30 PM

Affiliation

FV Taurus

Phone

9072991395

Email

Veerhusen@gmail.com

(mailto:Veerhusen@gmail.com)

Address

3688 Knapp Circle

Homer, Alaska 99603



Members of the Board of Fisheries —

Thank you for being forward thinking and helping to establish Alaska's statewater cod fisheries. These fisheries are vital for Alaskans, new entrants and our communities. Alaska's statewater cod fisheries have some of the highest Alaskan residency participation than any other fishery in the state, roughly 85%.

I support ACR #7.

muself and my boat the FV Taurus have been fishing out in Adak for over a decade. In 2019, we saw a 600% increase in participation from the Dutch Harbor Subdistrict. Currently, the Aleutians Islands Subdistrict (AIS) is a non exclusive district and remains the only State Water cod fishery without protections to prevent vessels from crossing over from other registration areas. Exclusive and Super Exclusive designations have been adopted by this Board previously to provide protections arising from changes in both Federally and State managed fisheries. This ACR simply levels the playing field between all districts and protects local fishermen and the community. We did not see these major impacts during the last cod cycle and the increase in boats is really impacting traditional boats out in Adak. please add ACR 7 to December's meeting.

We appreciate all the opportunities the BOG has granted to Alaskan residents fishing in statewater cod. These fisheries are a boon to our state.

I respectfully request you add ACR7 to the agenda

Dan Veerhusen

FV Taurus

RE: ACR 7 Designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod (5 AAC 28.606, 5 AAC 28.647).

In 2017 our company began operations in Adak, investing millions of dollars in the plant, local housing stock and infrastructure improvements; including environmental rehabilitation projects to address problems left by previous operators. Since opening we have created year round jobs (350 during the A season and 60 year round) and developed new markets; bringing the Adak economy back to life. A federal lawsuit against the National Marine Fishery Service (which is being appealed); combined with aggressive end of season harvest by fishers who also participate in the earlier Area O fishery, have put our operations and the local economy at immediate risk. The western Aleutian GHL fishery is the only fishery that has not already been granted the modest protection of exclusive registration. We ask that you support the ACR submitted by the Adak Community Development Corporation.

RE: ACR 7 Designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod (5 AAC 28.606, 5 AAC 28.647).

Alaska Board of Fish Chairman Morisky and Members This written testimony in reference to ACR7 - which would designate the Aleutian Islands Subdistrict for Pacific Cod an exclusive registration area. We have participated in the Aleutian Islands Subdistrict continuously since 2017. In 2019, we saw a 600% increase in participation from the Dutch Harbor Subdistrict. Please see table 7.1. In staff comments. Currently, the Aleutians Islands Subdistrict (AIS) is a non exclusive district and remains the only State Water cod fishery without protections to prevent vessels from crossing over from other registration areas. Exclusive and Super Exclusive designations have been adopted by this Board previously to provide protections arising from changes in both Federally and State managed fisheries. In 2019, the AIS was directly and immediately impacted after the Dutch Harbor Subdistrict (DHS) was increased in the Winter of 2018. We assert that the analysis of this expansion, the pressure of changing federal fisheries management in the BSAI and the impacts on other fisheries was not thorough and did not foresee those impacts on AIS. ACR7 should be approved so that a complete review and discussion can be held. The detrimental impacts are immediate and require Board action out of cycle so that the 2020 AIS harvesters, processors, and communities do not continue to be harmed. These stakeholders are dependent on a stable fishery and we ask that you place ACR7 on your Dec10th meeting in Seward. Ron & Julie Kavanaugh FV Insatiable & FV Sylvia Star 1533 Sawmill Circle Kodiak Alaska 99615

RE: ACR 7 Designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod (5 AAC 28.606, 5 AAC 28.647).

I am writing in support of ACR 7, a proposal submitted by the Adak Community Development Corporation to designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod. For more than ten years a variety of studies have shown that the western Aleutian communities of Adak and Atka can only remain viable if they have access to both federal waters Pacific cod and the state waters GHL fishery. A recent Washington DC District Court ruling has stripped this region of its access to the federal waters Pacific cod and the increasing number of vessels moving into the AI GHL fishery from Area O have put the community of Adak at immediate risk. In addition to the Pacific cod harvesters and plant workers dependent on these resources, these actions have also stalled our efforts to develop small scale urchin, geoduck and salmon fisheries, as well as the Golden King crab fishery; to maintain year round jobs and attract families to Adak.

ADF&G Board of Fisheries

Boards Support Section

P.O. Box 11556

Juneau, AK 99811-5526

Re: Comments ACR 7

Dear Chairman Morisky,

I am requesting the board approve ACR7: Designate the Aleutians Islands Sub district as an exclusive registration area for Pacific Cod.

All other state water cod fisheries in Alaska are exclusive or super exclusive and this ACR will align the Aleutian Islands regulations with the rest of the GHL fisheries in the state.

The Area O GHL fishery has expanded a number of times since its inception in 2014 to a 32 million pound fishery which is a volume orientated fishery with multiple markets. The Aleutian Islands GHL is a 14 million pound fishery with a trip limit which was implemented for the harvesters and markets to build their business plans around a consistent harvest rate for a smaller market.

Despite having a 32 million pound GHL, the Dutch Harbor fishery closed before the Aleutian Islands GHL. We experienced a huge influx of area O boats double dipping into the Aleutian Islands GHL fishery.

Most of the discussion around the Area O increase in 2018 focused on impacts to federal participants, and not to participants in other state water cod fisheries. Though the Board had a proposal in 2018 to address exclusivity in the Aleutians, it wasn't clear at the time how the



Area O change would interplay with the various dynamics in the Aleutians. Now that we better understands those shifts, and that several others have occurred, it's important to address them.

This proposed action will ease the continued erosion of the opportunity for the Aleutian Islands fisherman like myself as well as the Aleutian communities dependent on shore based processing.

This will keep the fishery safe and from overcapitalization which will ensure a delivery of a quality product.

Another unexpected but very meaningful layer of change in the region since the 2018 meeting is the recent elimination of the Aleutian Islands set aside of federal cod that has been crucial to maintaining an in-region market. Stability of the state water GHL and the community's ability to create value added products over the course of a long season is more important than ever. This is another dynamic the Board was not able to consider at the time this region's issues last came up.

Like Area O, this is a very important fishery to the under 60 fleet. Even under an exclusive registration, like other state water cod fisheries, it would still be accessible to anyone in the fleet that wishes to fish their state water season in the Aleutians. In fact the Aleutians is already broader in the sense that a greater number of gear types and vessel sizes are able to participate. This fishing opportunity serves to spread effort between regions, which will be increasingly important as the DHS



GHL increases. But that will only be the case if participants can count on the consistency of that opportunity. Should the current issue continue, it is very likely that the 5 or 6 boats currently fishing only the Aleutians will instead choose to start their season in Area O, adding substantially to the effort there. The AI GHL would then be prosecuted much differently. It is unclear whether the processor and community members depending upon this fishery would be able to survive such a dramatic change.

Thank you for considering my comments.

Sincerely,

Todd Hoppe

F/V Deliverance

P.O. Box 2589 Homer, AK 99603

Corporate Headquarters
PO Box 649
Glennallen, Alaska 99588
Office: (907) 822-3476
Fax: (907) 822-3495



PC077
1 of 1

Anchorage Office
110 W 38th Avenue, Suite 10
Anchorage, Alaska 9950
Office: (907) 868-825
Fax: (907) 868-828

Our Culture Unites Us; Our Land Sustains Us; Our People are Prosperous

October 7, 2019

Alaska Department of Fish and Game
ATTN: Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

To Alaska Board of Fisheries:

Please consider our comments on ACR 11 to prohibit use of earthworms to fish with in fresh waters in Alaska.

We support ACR 11 to prohibit use of earthworms to fish with in fresh waters in Alaska. According to the author of this proposal, earthworms are becoming popular to fish with, and could possibly affect habitat of fish in fresh water bodies in Alaska. He also stated that a few lower-forty eight states have banned use of earthworms to fish with due to harmful effects to the environment.

By,

Bloria Stickwan

for Eleanor Dementi

Eleanor Dementi

Vice Chair, Ahtna Tene Nene

RE: ACR 11 Prohibit fishing in fresh water with live earthworms in the genus Lumbricus (5 AAC 75.022).

ACR 11: SUPPORT This is a well-justified request and should be considered. The Native Village of Eyak supports preventing the introduction of invasive species and supports a ban on using earthworms for bait.



October 8, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
<https://adfgcomments.psmfc.org/Meeting/Details/966>
Agenda Change Requests (ACRs)
October Work Session

RE: OPPOSE ACR 2, 3 & 4

Chairman Jensen and members of the Alaska Board of Fisheries,

Icicle Seafoods is one of the largest and most diversified seafood companies in Alaska, with facilities and operations throughout the state including Southeast, Prince William Sound, Cook Inlet, Kodiak, Bering Sea and Aleutian Islands, and Bristol Bay. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of fisheries resources. We welcome the three new members, and appreciate the opportunity to comment on the Agenda Change Requests (ACRs) submitted to the Alaska Board of Fisheries (BOF) for the October Work Session.

We based our comments on the criteria for ACR's. In order for the board to approve and schedule an ACR for later in the meeting cycle, the ACR must meet one of the following criteria as established in 5 AAC 39.999.

- For a fishery conservation purpose or reason.
- To correct an error in a regulation.
- To correct an effect on a fishery that was unforeseen when a regulation was adopted.

We are opposed to the following ACR's due to lack of meeting ACR criteria:

ACR 2, OPPOSE – Modify hatchery operations in Crawford Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish.

ACR 3, OPPOSE – Designate Taku River king salmon a stock of management concern and adopt an action plan.

ACR 4, OPPOSE – Reduce the Sitka commercial sac roe fishery guideline harvest level and increase the threshold at which commercial harvests may begin.

ACR 2, OPPOSE– Modify hatchery operations in Crawford Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish. As a processing company that is dependent on salmon, we oppose the ACR submitted by Nancy Hillstrand. Hatchery organizations and ADF&G have already provided the BOF with a significant amount of scientific information and a comprehensive explanation of the hatchery process, so our comments will focus on ACR criteria. In addition, Icicle Seafoods submitted multiple comments on the various attempts to curtail hatchery salmon operations over the past year. ACR 2 is yet another attempt by the proposer to circumvent the BOF process, regular meeting cycle, and the hatchery process that is driven by science, public input, and rigorous analysis. This issue does not constitute an emergency or conservation concern.

We urge the BOF to be very cautious when considering proposals that frequently “cherry pick” scientific information to justify arguments. We encourage the continued support for the ongoing Alaska Hatchery Research Project (AHRP) which was designed to analyze potential interactions between hatchery and wild salmon in Alaska. This research project will provide crucial data and help provide clarity on the multitude of unverified scientific “facts” that are being distributed to confuse the general public.



In addition to these ACRs not meeting the criteria, by attempting to restrict commercial ability to harvest salmon through hatchery production, the proposer would be limiting personal use, sport, and subsistence harvest. All user groups are dependent on hatchery production as an important source of salmon.

There is no fishery conservation purpose or reason for this ACR. This ACR does not correct an error in a regulation. This ACR does not correct an effect on a fishery that was unforeseen when a regulation was adopted.

ACR 3, OPPOSE – Designate Taku River king salmon a stock of management concern and adopt an action plan. The policy for changing board agenda does not apply to stock of concern designations because that designation is not a regulatory change. ADF&G has taken significant action to reduce harvest of Taku king salmon, including restricting both commercial and sport effort. Like many others, we are concerned about king salmon abundance in Southeast Alaska. ADF&G has demonstrated their commitment to ensuring the Taku stock is protected and will continue to put appropriate management measures in place.

There is no fishery conservation purpose or reason for this ACR. This ACR does not correct an error in a regulation. This ACR does not correct an effect on a fishery that was unforeseen when a regulation was adopted.

ACR 4, OPPOSE – Reduce the Sitka commercial sac roe fishery guideline harvest level and increase the threshold at which commercial harvests may begin. Once again, the ACR process is being used to try and circumvent the regular BOF cycle regarding herring. The BOF January 2018 Southeast and Yakutat Finfish and Shellfish meetings in Sitka already extensively dealt with herring issues, where ADF&G management was fully analyzed. Similar ACR's have been heard at multiple BOF Work Sessions, including 2018 which occurred merely seven months after the regular Southeast BOF cycle. Regardless of a regularly scheduled BOF cycle, herring harvest opponents consistently attempt to use the ACR process to manage the herring fishery.

As is the same for past ACR herring proposals, no new information has been presented. Our business and the success of our fishermen and tenders is dependent on sustainable fisheries management to ensure a fishery exists into the future. Harvesters and processors would never support short term profits that threaten the long term viability of the resource. ADF&G continues to use effective and critical in-season management to determine if, when, and how a commercial herring harvest will occur. They do this in consultation with members of the Sitka Tribe. The extreme pulse nature of herring fisheries requires constant monitoring and adjustments to the fishery, all with subsistence harvest opportunities in mind. Over the years, significant changes have been made to the fishery at the BOF. Most notably is the continued expansion of the closed "core area" which has severely reduced area available for commercial harvest.

The herring fishery is sustainably managed and is very well understood. There is more data on Sitka herring than any other State managed fishery. Sitka herring is acknowledged amongst the scientific community as one of the best available data sets for all herring resources in the Pacific. The data for the Southeast herring resource spans over 60 years and has grown to include age composition data, size at age, fish condition, biomass data, spawning biomass, annual miles of spawn, spawn deposition and density data and more. ADF&G uses this data to manage the fishery conservatively and has done so since the fishery's inception in the 1970's. ADF&G has worked collaboratively with other herring managers on the West Coast and will be incorporating changes to the management plan and harvest strategy and Guideline Harvest Level (GHL) as necessary. Overall herring biomass and distribution has changed over the years and ADF&G has proven their continued ability to manage for sustainability.

Although no commercial herring fishery occurred in Sitka in 2019, this was due to the large biomass of smaller unmarketable herring. There are some very large year classes of young herring that will be recruiting into the fishery in the next few years. Icicle fishermen reported seeing more herring



on the grounds that ever before. Those fish are mostly too young to spawn but remained intermixed with larger more marketable herring making harvest challenging. With the explosive increase in humpback whale populations in the Sitka area, herring are also sticking close to the bottom resulting in another barrier to harvest.

Icicle has processed herring since the Sitka fishery began. We are committed to sustainable harvest as are our workers, fishermen and tender operators who live throughout the State of Alaska. Herring harvest is important to coastal Alaska communities like Petersburg where Icicle processes herring. Our engineers spend four weeks assembling the processing line, processing herring, and then taking the processing line out. This work occurs when there is not much fishing activity in Southeast and gives critical employment to local residents. The truck drivers who work for barge companies get two to three weeks of work as well, and there is money in town that would otherwise not be there that goes to grocery stores, coffee shops, restaurants, laundromats, etc. Herring is important to our processing workers and key staff as well, and to the 50 or so people who work on tenders for a few extra weeks in the winter. This fishery positively impacts communities like Petersburg in the slow winter months.

There is no fishery conservation purpose or reason for this ACR. This ACR does not correct an error in a regulation. This ACR does not correct an effect on a fishery that was unforeseen when a regulation was adopted.

Once again, we extend an invitation to any member of the board to observe either the Sitka herring fishery or any of our statewide fisheries. Thank you for the opportunity to comment. Please reach out if you have any questions.

Sincerely,

Julianne Curry
Public Affairs Manager
Icicle Seafoods
Julianne.Curry@icicleseafoods.com
Cell 907.518.1822



Justin Peeler

F/V Defiant

4120 Halibut Point Road

Sitka, Alaska 99835

(907) 340-6106

justinpeeler79@gmail.com

October 8, 2019

Alaska Board of Fisheries

October 23-24, 2019

Work Session

RE: Comments on ACR 1, ACR 2 and ACR 4

Dear Chairman Morisky and Board of Fish Members,

As a second-generation Fishermen from Petersburg Alaska I have been involved in the salmon, herring, and crab fisheries in Southeast Alaska all my life. As well as many other net, pot, and hook fisheries on the West Coast and Gulf of Alaska. I currently own and operate the F/V Defiant out of Sitka, Alaska.

I serve my communities and fellow salmon seiners as the President of the Board of Directors of Northern Southeast Regional Aquaculture Association, I also hold the northern seine seat on the Joint Regional Planning Team. I am involved with Southeast Alaska Seinners Association as an officer on the board and a United Fisherman of Alaska Alternate.

Support to ACR 1-

I ask you to support this ACR to give trollers more access to enhanced chum salmon.

Opposition to ACR 2-

ACR 2 seeks to shut down the remote hatchery release site in Crawfish Inlet. This ACR fails to meet criteria. There is no conservation concern at this time and the author has exaggerated data to try and insinuate that there is one. This is a simple attempt to go around and degrade the system that is in place. I ask you not to take action on this ACR because of this reason.

The Department and Northern Southeast Regional Aquaculture Association have been taking proper management action to harvest hatchery fish returning to this release site while protecting wild stock returns. As this project develops we will take more action to harvest these fish and protect the wild stocks. By taking any action besides rejection, you are disrupting coastal Alaska as we know it. The fishermen of Alaska invested in something to create more



than a living but a stable financial environment for all; in the coastal communities around Alaska. A environment that other supportive industries to fishing have been built on and that financial institutions can operate in with stability. This is bigger than one man's increase in catch; this is something that has been built to stabilize coastal communities. Fishermen took the risk to invest in that stability by taxing themselves and applying for loans to create more fish for themselves and the communities around them. More fish for all users while protecting our wild stocks! Our hatchery programs and wild stock management is a success and example to all for enhanced sustainability of Salmon.

Opposition to ACR 4-

I ask you to oppose ACR 4 based on the fact that it does not meet criteria. The Sitka Tribe of Alaska is attempting to go around the process once again and shut down the sac roe herring fishery in Sitka Sound. We went over this at great length at the 2018 BoF meetings in Sitka. At those meetings the BoF took action to protect the herring stocks in Sitka Sound by closing more area in the sound to commercial fishing. I believe this action along with others and the science based management of the Department are proof of conservation management that is being taken to sustain the Sitka Sound Herring Stock.

In closing I would like to thank you for your service to the State of Alaska.

Sincerely,

Justin Peeler



Ocean Beauty Seafoods LLC
1100 W Ewing St Seattle, WA 98119
(206) 285-6800



October , 2019

Alaska Board of Fisheries

Mr. Morisky, Chair

Via email: dfg.bof.comments@alaska.gov

Dear Chairman Morisky,

Ocean Beauty Seafoods (OBS) LLC is an Alaskan seafood processor with five processing facilities located in coastal Alaska: Naknek, Alitak, Kodiak, Cordova, and Excursion Inlet. Our company has operated for over 100 years in Alaska. 4 out of the 5 facilities operate only seasonally for the summer salmon runs and all rely heavily on pink and chum salmon to provide volume for the plant to run efficiently.

This letter is written in response to ACR-1 and ACR-2 mentioning hatchery production of Salmon. OBS does not support either of these ACR's. Both are aimed at impugning hatchery activities without recognizing ADFG regulatory process for hatcheries or understanding the economic ramifications ARC-2 would impose upon coastal Alaska. We ask the Board of Fisheries to move forward with the Joint Protocol by learning more about the Alaska Hatchery Program through regularly scheduled updates.

Alaska salmon processors compete in a world market that is very competitive. One of the most difficult challenges is the recent decline of pink salmon volumes in Alaska, particularly in even years. This decline has come while we have seen record harvests out of Russia for pinks. Based on reported catches the Russian pink harvest in 2018 was nearly 8 times as large as the 2018 Alaskan pink catch. Preliminary harvest numbers indicate Russian pink harvest was 2 times greater than Alaska in 2019. This occurred on an odd year, when typically, Alaska has a harvest that exceeds Russian. Our plants outside of Bristol Bay depend on pink and chum volumes to remain competitive. Hatchery production of pink and chum salmon are vital to our future. Our industry must have volume to support fisherman, tenderman, and processors who depend on salmon to provide for their families. We cannot merely raise prices of salmon processed to offset lost volume because we would be non-competitive with fisheries in other



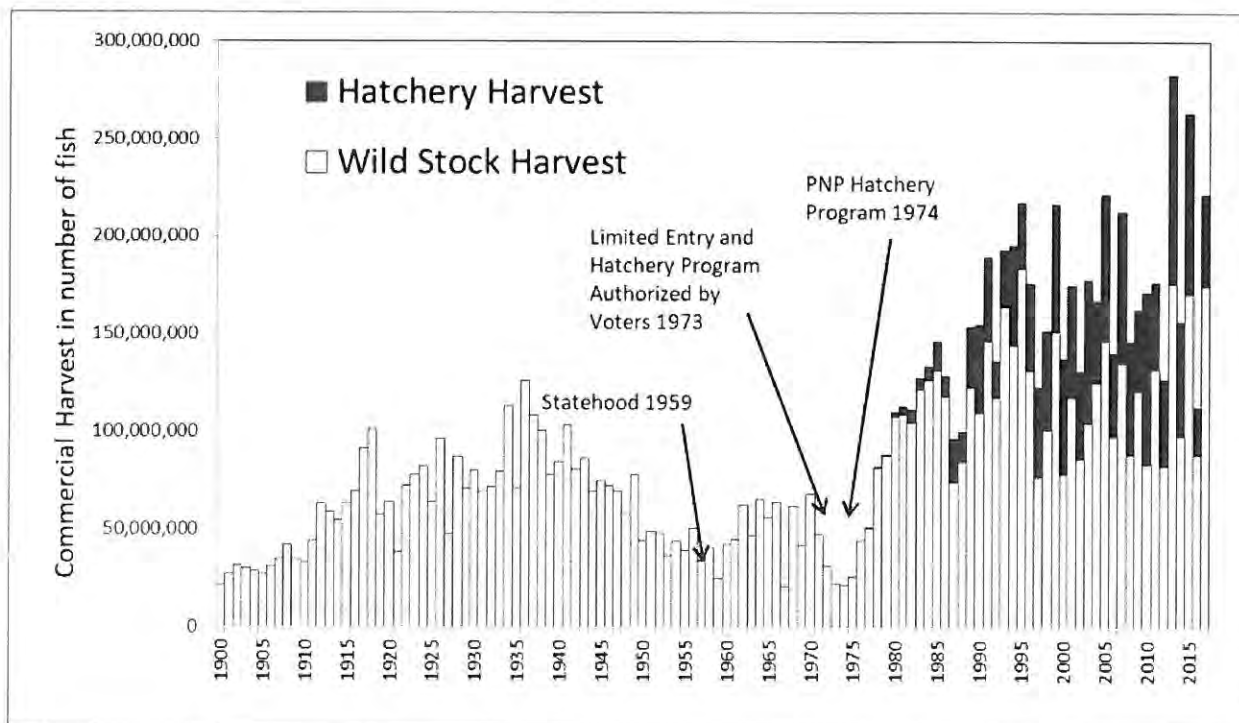
countries. The Alaskan communities where Ocean Beauty operates heavily depend upon commercial harvests of summer salmon runs.

Economic data compiled by the McDowell Group show:

- Hatcheries account for 4,700 jobs and \$218 million in local labor income.
- Income earned from hatchery related harvest reaches more than 16,000 individuals (processors, fishermen, and hatchery workers).

When deciding on possible long-term capital investments a key determining factor is the business foundation of the local community. Hatcheries, through jobs and fish, created have been contributors to solid community foundations in coastal Alaska. Without the volume of fish that hatcheries produce, cost of production of all salmon species will increase and the ex-vessel value our fisherman and communities depend on will be lost.

There is a misconception that hatchery stock has resulted in decreased wild stock productivity. The accompanying graph demonstrates that for the last 30 years both wild stock salmon and enhanced salmon have increased in productivity in a major way compared to returns before Hatchery Program began in 1974. In addition, Russian harvests have grown exponentially during this time demonstrating that the Ocean carrying capacity for salmon has been strong.



According to Fish and game hatcheries contributed the following to the Pink and Chum catches for 2018.

Southeast hatcheries primarily produced Chum in 2018. Hatchery Chum was 85% of the Chum caught in the commercial fishery and 40% of all Salmon caught for all commercial gear types



Prince William Sound primarily produce Pink Salmon in 2018. In 2018 hatchery Pink was 65% of the total pink salmon caught in the commercial fisheries and 60% of all Salmon caught for all commercial fisheries.

The official numbers are not in yet for the 2019 harvest, but early indications show Southeast hatchery origin Chum could be as much as 90% including cost recovery of all Chum salmon caught for all gear types. Pink Salmon in Prince William Sound show similar numbers with up to 90% of the pink salmon harvested including cost recovery being of Hatchery origin.

Without these hatcheries it would be very difficult for fishermen, processors, and communities that are supported by commercial fishing to survive when faced with large swings in wild fish abundance.

Ocean Beauty urges the Board of Fish to continue to take no action on ACR's 1 and 2. We also urge revisiting the process outlined in the Joint Protocol on Salmon Enhancement #2002-215 FB.

Respectfully,

Mike Forbush

Senior Alaska Operations Manager

Ocean Beauty Seafoods, LLC



IN REPLY REFER TO:

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

OCT 08 2019

OSM/19084.GP

Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Morisky:

The Alaska Board of Fisheries will consider 12 Agenda Change Requests, among other issues, at its work session beginning October 23, 2019.

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed these requests and does not believe the decision to accept any of these requests for out-of-cycle regulatory action will have impacts on Federally qualified subsistence users. If any of the Agenda Change Requests are accepted and assigned to future meeting dates for deliberation, Federal staff comments will be submitted for proposals which may result in impacts to Federally qualified subsistence users. During the meeting, OSM may wish to comment on other agenda items that may impact Federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board of Fisheries and the Alaska Department of Fish and Game on these Agenda Change Requests should they be accepted.

Sincerely,

Thomas Doolittle
Acting Assistant Regional Director



Chairman Morisky

2

cc: Anthony Christianson, Chair, Federal Subsistence Board
Thomas Whitford, Acting Deputy Assistant Regional Director,
Office of Subsistence Management
Suzanne Worker, Acting Subsistence Policy Coordinator, Office of Subsistence Management
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management
Robbin La Vine, Acting Anthropology Division Supervisor
Office of Subsistence Management
Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game
Glenn Haight, Executive Director, Alaska Department of Fish and Game
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Southcentral Subsistence Regional Advisory Council
Interagency Staff Committee
Administrative Record



October 8, 2019

Alaska Department of Fish and Game
Board of Fisheries
PO Box 115526
Juneau, AK 99811
Via email: dfg.bof.comments@alaska.gov

RE: Comments on October 23-24 Work Session ACRs

Dear Chairman Morisky and Board of Fisheries Members,

PVOA's mission statement is to:

"Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat."

We appreciate the opportunity to provide these comments on the following Agenda Change Requests regarding Southeast Alaska fisheries.

***ACR1**

Add the Crawfish Inlet Terminal Harvest Area and West Crawfish Inlet to waters that may be opened to a hatchery chum salmon troll fishery (5AAC 29.112).

PVOA supports the *Southeast Alaska Enhanced Salmon Allocation Management Plan* passed by the Board in 1994 to allocate enhanced fish as follows: (1) seine - 44 - 49 percent; (2) hand and power troll - 27 - 32 percent; (3) drift gillnet - 24 - 29. Data shows the troll fleet harvest is below their allocation in recent years and our membership supports this ACR as an effort to increase their harvest of enhanced chum salmon.

***ACR2**

Modify hatchery operations in Crawfish Inlet and establish regulations to clarify and differentiate wild fish as distinct from hatchery fish.

PVOA members are opposed to this ACR asking to modify hatchery operations for the Crawfish Inlet remote release site, which has seen unexpectedly large returns in 2018 and 2019. In 2018, a chum and pink salmon stream in West Crawfish Inlet was sampled twice for stray hatchery fish finding 64% and 96% stray rates. This stream and two more, including one in Whale Bay, were sampled for strays in 2019 with results coming this winter.

PVOA is opposed to this ACR and believes it is not the appropriate solution to address these enhanced chums returning to West Crawfish Inlet rather than their release site of Crawfish Inlet. A better solution would be to increase the size of the THA and allow fleets to intercept and harvest these fish before they reach the head waters of either inlet. Fishing on these returns at Second Narrows and Walker Channel, closer to the ocean, would allow fishermen to harvest these chums when they are of a higher quality and value than fish that have spent several weeks in the head of an inlet in contact with fresh water.



If openings continually occurred on a set schedule similar to Deep Inlet, Anita Bay, Kendrick Bay, and many other THAs throughout southeast, large numbers of fish may not school up in the head of the Crawfish Inlets and Whale Bay reducing the opportunity for enhanced chums to stray into wild salmon streams.

***ACR4**

Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass (5AAC 27.160)

PVOA is opposed to this ACR and any change to the Sitka Sound herring management plan while the court case between the State of Alaska and the Herring Conservation Alliance vs the Sitka Tribe of Alaska is not settled.

Additionally, the 2018 ADF&G report on southeast herring to the Board of Fisheries shows the Sitka herring stock, Section 13A and 13B, is healthy under its current management plan. The biomass has been in a slight decline trend since 2009, when the biomass reached its highest level on record. While the biomass has been declining, in 2018 it was estimated as above the long-term average of all years since 1970¹. The lack of commercial harvest in 2019 was due to market conditions, not a lack of an available harvestable surplus.

Thank you for your time and dedication in serving the public by reviewing comments for the upcoming Work Session. **PVOA supports the adoption of ACR1 as a proposal and asks ACR2 and ACR4 not move forward as proposals.** We also hope the Board shares our sense of urgency in finding ways to increase the quality and value of the harvest of enhanced chum salmon returning to Crawfish Inlet while reducing their ability to school up in places vulnerable to straying.

Petersburg Vessel Owner's Association (PVOA) is composed of over 100 members participating in a wide variety of species and gear type fisheries in state and federally managed waters. An additional thirty businesses supportive to our industry are members. PVOA members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, crab, shrimp, sea cucumbers, and geoducks.

Respectfully,

A handwritten signature in blue ink that reads "Megan O'Neil".

Megan O'Neil
Executive Director

¹ Hebert, K. 2017. 2018 Report to the Alaska Board of Fisheries: Southeast Alaska-Yakutat herring fisheries. Alaska

October 8, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Comments on Agenda Change Request 2 and 4

Dear Chairman Morisky and Alaska Board of Fisheries Members:

Silver Bay Seafoods, LLC (Silver Bay) is opposed to Agenda Change Requests (ACR) 2 and 4 currently under consideration by the Alaska Board of Fisheries (board) at its October 23-24 work session in Anchorage.

Silver Bay is a predominantly fisherman-owned, Alaska seafood processing company. We operate five processing facilities in Sitka, Craig, Valdez, False Pass, and Naknek. Our processing plants provide hundreds of jobs that benefit Alaska's coastal communities and economies. The fishermen, crewmembers, tendermen and plant workers all rely on fishermen access to harvesting opportunities.

ACR 2: Modify hatchery operations in Crawfish Inlet

SBS opposes ACR 2 because it doesn't meet the criteria for an ACR, threatens fishermen's access to a well-managed fishery, and lacks factual and scientific information fishery management decisions should be based on.

Crawfish Inlet has provided significant opportunity in recent years. For example, the 2018 preliminary harvest summary estimated Southeast's ex-vessel value for salmon harvest was approximately \$130.6 million dollars (pink and chum making up nearly 70% of that amount) and the 2018 Crawfish Inlet fishery alone was \$14.5 million in exvessel value. This means Crawfish provided about 11% of the total value of salmon harvested in Southeast. In years where salmon returns are at lower levels and fishing is slow, fishermen rely heavily on opportunities provided by enhanced fisheries like Crawfish Inlet.

The State of Alaska has a rigorous and open public process to apply for PNP hatchery permits, with a methodology to select a local broodstock source and a framework to minimize impacts to wild stocks; all of which is well documented in the PNP statutes and regulations. Many hatchery proposals and release sites are denied by ADF&G. Prior to Crawfish Inlet being



permitted, the Northern Southeast Regional Aquaculture Association (NSRAA) went through a rigorous process with ADF&G to identify a location where wild stock interactions were minimal.

We echo the comments submitted by the NSRAA regarding this ACR's lack of merit. We encourage you to review the ACR comment letter by NSRAA submitted to your attention on September 15.

ACR 4: Reduce the Sitka Sound commercial sac roe herring fishery guideline harvest level and increase the commercial fishery threshold biomass

The Sitka Sound Herring Sac Roe fishery has been an integral part of our business plan over the last twelve years, and the substantial investments we have made in the fishery and the Sitka facility have been made strategically. In other words, realizing the Department of Fish and Game has managed the Sitka Sound Herring Sac Roe Fishery based on the best science and sustained yield principles, SBS committed to long-term investments in a well-managed, healthy resource. This capital investment has resulted in direct job creation and retention by SBS but has also been an economic stimulus to the overall economy of Sitka.

Silver Bay seafoods opposes this ACR because it doesn't meet the criteria and it threatens fishermen's access to a sustainably managed fishery. We do, however, support ADF&G's efforts to continue to improve their herring biomass model and update fisheries management as new scientific information becomes available. If results from ADF&G's updated data suggests changes to the fishery threshold biomass and GHF are necessary, then we will support those efforts in order to ensure sustainable herring abundance.

Silver Bay recommends that the Alaska Board of Fisheries confirm Alaska Department of Fish and Game's assessment and deny ACRs 2 and 4 as these ACRs do not meet the criteria. There is not a fishery conservation purpose or concern, the agenda change requests do not correct an error in regulation, and the agenda change requests do not address an effect of regulation on a fishery that was unforeseen when the regulation was adopted. Silver Bay does not believe that either of these ACRs meets the criteria for being heard outside of the regular cycle.

Respectfully,

Abby Fredrick

UNITED SOUTHEAST ALASKA GILLNETTERS



PC085
1 of 4

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

September 21, 2019

Board of Fisheries

Dear Chairman Morisky and Board of Fish Members;

United Southeast Alaska Gillnetters supports ACR 1, as we feel it does meet criteria necessary for consideration.

The criteria met is to correct an effect on a fishery that was unforeseen when a regulation was adopted. When the current regulation was adopted, it was unforeseen that the troll fleet would be precluded to harvesting hatchery chums in the event of a troll closure.

In 2019, a large biomass of hatchery chum amassed in West Crawfish. Trollers were just beginning to have substantial harvests, when there was a general troll closure for the conservation of coho. West Crawfish was outside the regulatory THA, precluding troll harvest for the eight days, costing the troll fleet, well behind in its enhanced allocation, hundreds of thousands of dollars in value.

Our gear group recognizes the practicality of this ACR as a tool to allow the gear group behind in its allocation percentage to maximize their potential, and as a 7 day a week cleanup crew of hatchery fish. We also recognize that there will be no undesired side effects regarding having this chum target fishery going during a closure for coho, as the gear types used for both species are very different. It is the consensus of the gear groups that Crawfish have a troll priority through 2025, and this will allow them that priority and opportunity.

United Southeast Alaska Gillnetters is opposed to ACR 2, as we feel it does not meet criteria necessary for consideration.



The timing of the stray proportion samples in 2018, given the temporal difference in run timing of wild summers and hatchery falls, would indicate to us that there would be a higher percentage of strays' present, as the summer wild carcasses were probably largely deteriorated beyond sampling standards. A higher percentage at a given time does not give an indication of the actual percentage if inadequate samples are taken during the entirety of the run. Hence, "The magnitude of straying relative to the size of the wild run is the most important criterion." It is obvious that straying is an evolutionary adaption of the salmon species. There is no knowledge of how often it occurs, if it's a steady percentage of the population, or if weather/climate conditions trigger the behavior. In short, wild salmon have been intermingling genes for thousands of years. Straying hatchery fish with a brood secured from local systems are probably going to have little negative impact were some successful in bridging the timing gap between runs and breed. That being said, we do understand the need to minimize straying as much as practical. The returns to Crawfish have been pretty extraordinary, and the department is aggressively pursuing a management strategy to minimize straying. To the best of our knowledge we have no record or claim of any actual disease outbreak in this wild stock, or any wild stock for that matter, attributable to hatchery strays. The idea that hatchery strays compete for food with local fish is rather silly. Terminal fish eat little to nothing. We see no conservation purpose or reason here, as no degradation of the wild run has been shown, only implied.

There is no error in regulation. The Commissioner of Fish and Game allowed this permit at the recommendation of the RPT. It was a thoroughly vetted publicly noticed process.

Crawfish has been an extraordinary project, especially in 2018. The return was unprecedented. 2019 was not nearly as robust, and future returns will in all likelihood have returns that will be within more normal parameters. Given SE Finfish is a mere 15 months away, this ACR should just be a proposal at that meeting. It is certainly impactful to the region and deserves the regions stake holders full attention rather than be taken up anytime sooner, particularly at a work session in October.

United Southeast Alaska Gillnetters opposes ACR 3, as we feel it does not meet criteria necessary for consideration.

Preliminary numbers indicate that the Taku River chinooks may be slightly under the lower bound for its escapement goal for 2019. However, the return was larger than



predicted, as were the majority of chinook returns in the region. Current management restrictions set forth by Action Plans at SE Finfish 2018 would be similar if not identical, to SOC restrictions. Action plans enacted at SE Finfish 2018, have reduced all user groups impact on these fish, in an effort to maximize escapement. 2019 Taku chinook came in above forecast for large fish, and had a high component of 1 ocean fish. This would indicate improving ocean survival. With another season at least on conservation measures, this ACR, if the proposer deems it necessary, can certainly be submitted as a proposal at the next SE Finfish, 2021, a mere 15 months away. This would be the appropriate meeting, so all stakeholders can participate in the discussion. Taku River chinook are managed in conjunction with Canada, through the Pacific Salmon Commission. It's unclear to us whether the Board of Fisheries has authority to declare fish that spawn in another country as a stock of concern. We are concerned that such an action could have unforeseen consequences involving other stocks that fall under the auspice of an international treaty.

We would also like to comment on the Upper Cook Inlet meeting location. United Southeast Alaska Gillnetters are supportive of a rotating venue of board meetings within a region. The Board of Fisheries is a unique process. Having meetings in various communities allows for more exposure and future participation in the meetings. It also allows AC members the opportunity to see the process, meet board members and staff, and learn to be better AC members. We understand that each region is unique, with different travel and lodging issues, but we would hate to see a precedence set that could disengage the general public from the process.

Sincerely,

Max Worhatch, Executive Director, United Southeast Alaska Gillnetters



Submitted By

Alan Crookston

Submitted On

10/7/2019 6:18:27 PM

Affiliation

ESSN

Phone

801-309-4458

Email

alancrookston@me.com

(mailto:alancrookston@me.com)

Address

53509 Veco Ave

Kenai, Alaska 99611

PC086
1 of 2

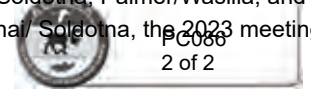
Dear Alaska Board of Fisheries Member:

I encourage you to vote at the 2019 October BOF Work Session to return the location of the 2020 Upper Cook Inlet Finfish meeting to the Kenai Peninsula location of Kenai/Soldotna and to stand by **Policy 2018-289FB1**, adopted March 9, 2018, to rotate the meetings between Kenai, Wasilla and Anchorage.

Boards since 1999 have chosen to hold this two-week long meeting in Anchorage. Other communities, principally Kenai/Soldotna, would like to host the meeting. Below are the reasons I support the 2020 Upper Cook Inlet Board of Fisheries meeting location be held in Kenai/Soldotna:

- **The Board has not held a full Upper Cook Inlet Finfish meeting in the Kenai/Soldotna area since 1999!**
- **75% to 85%** of all UCI Finfish proposals affect Kenai Peninsula watersheds.
- The Citizens of the City of Kenai and the community of Kasilof, who are directly impacted by the tens of thousands of personal use fishers who descend on their communities each summer to harvest salmon, have had few opportunities to give input on management and discuss their impact, because the meetings are held **exclusively** in Anchorage.
- The majority of the **sportfishing activities** in Upper Cook Inlet occur on the Kenai Peninsula, yet its residents have repeatedly had limited access to the Board of Fisheries process which grows more and more anchored to Anchorage.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the 130-year-old **commercial salmon fisheries** has all but disappeared from the Board of Fish process.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the regarding centuries-old **subsistence fisheries** has all but disappeared from the Board of Fish process.
- Peninsula businesses that prosper from, and support the commercial, sport and subsistence lifestyles throughout the year would benefit from taking part the deliberations made at these meetings.
- If the meeting is held in Kenai/Soldotna, local businesses including hotels, restaurants, B & B's, retail stores, and gas stations among others, will benefit from the winter boost in revenue during an otherwise slow time of year.
- The Kenai Peninsula is home to the many of Upper Cook Inlet's Fish and Game Advisory Committees, Aquaculture, Conservation and Fishing associations and their participation will be enhanced.
- The Kenai and Kasilof rivers run through the Kenai Peninsula Borough and thus all of the sport, personal use and subsistence fisheries supported by those rivers occur within the Borough.
- The entire East Side Setnet fishery is conducted within the Kenai Peninsula Borough.
- The entire Drift Fishery is conducted in the Kenai Peninsula Borough.
- All Personal Use Fisheries on the Kenai Peninsula occur within the Kenai Peninsula Borough.
- Virtually all Upper Cook Inlet Saltwater Sport Fisheries are conducted within the Kenai Peninsula Borough.
- The Kenai Peninsula Borough has 44 schools with 8950 students who would benefit from the experience of attending a Board of Fisheries meeting in or near their own hometowns.
- There are several meeting venues in Kenai/Soldotna that are large enough, and well-configured to hold the UCI Finfish meeting. These facilities have good cell service and internet connectivity, audio/visual equipment, and are staffed by experienced personnel who support a variety of large events and professional meetings.
- The area is accessible for the Board Members, support staff, and the public who could fly or drive to the area to attend the meeting. The Kenai Municipal Airport is a full service airport, with more than 20 flights to/from Anchorage per day and multiple regional air carriers.
- There are numerous quality restaurants within walking and/or short driving distance from the meeting space.
- There are nearly 40,000 residents in the Central Kenai Peninsula, many of whom are deeply invested in the outcomes and work of the Board of Fisheries.
- **Policy 2018-289FB1** addressing the rotation of UCI Finfish meetings, is reasonable and responsive to the concerns shared by Kenai Peninsula residents over the past two decades. Like the Board does for other Alaskans in communities around the state, it is important to ensure that Kenai Peninsula residents also have periodic access to the Board deliberation and decision-making process. Rotating the meeting location between Anchorage, the Kenai Peninsula and the Mat-Su Valley, would be consistent with how other finfish meetings are **routinely** scheduled.
- The decision, to hold the UCI meetings in Anchorage for the past six cycles rather than rotating them between affected communities, is inconsistent with how the board treats other Finfish meetings.

In approving **Policy 2018-289FB1**, the Board previously recommended that UCI Finfish meetings rotate between Kenai/Soldotna, Palmer/Wasilla, and Anchorage on a 3-year cycle. I support **Policy 2018-289FB1**. The board recommended holding the 2020 meeting in Kenai/ Soldotna, the 2023 meeting in Wasilla/Palmer, and the 2026 meeting in Anchorage.



The Alaska Board of Fisheries (board) noted in **Policy 2018-289FB1** that it regularly rotates meetings among various stakeholder communities throughout the state, ensuring that ordinary Alaskans have access to this important process. The Alaska Board of Fisheries (board) stated in **Policy 2018-289FB1** that one of the most divisive issues it faces almost every year is not a regulatory subject, but rather **where to hold the Upper Cook Inlet Finfish meeting**. The board recommended future boards rotate the Upper Cook Inlet Finfish meeting between the three principle communities of Kenai/Soldotna, Palmer/Wasilla, and Anchorage. **Policy 2018-289FB1** contemplates the meeting will rotate between these three communities throughout its 3-year meeting cycle.

For more than two decades the **ordinary people** of the Kenai Peninsula have been marginalized, excluded from the Board of Fish process by distance, cost, and inconvenience, simply because of where they live. Please don't let that continue. I request that you vote to return the 2020 Upper Cook Inlet Finfish Meeting location to Kenai/Soldotna and I encourage you to stand by **Policy 2018-289FB1** as adopted March 9, 2018.

Respectfully,

Alan T. Crookston

RE: UCI meeting location

Dear Members of the Alaska Board of Fisheries, Policy 2018-289B was created to hold meetings on a rotating basis between Anchorage, Kenai Peninsula, and Mat-Su. This policy takes the politics out of meeting locations and is a fair and equitable way to plan meeting locations. Kenai Peninsula stakeholders have been asking for a meeting in our community for TWO decades. Since 1999 our fisheries on the Kenai Peninsula have changed tremendously. It is time for the Board of Fish members to come hear from our community members. Why is the Kenai/Soldotna location treated any different than Sitka, Dillingham, Valdez, Kodiak, Seward, Homer, Bethel, Wrangell, Cordova, Juneau, and Girdwood all towns where the board of fish meeting has taken place. The Upper Cook Inlet Task Force was held in Kenai in 2013 and there was no hostility or tumultuous meeting. Governor Parnell, Governor Walker, multiple legislators and hundreds of stakeholders have asked for a meeting on the Kenai Peninsula for years. Please do what is right and vote to hold a meeting on the Peninsula and uphold policy 2018-289B. Thank you for your time, Amber and Travis Every 360 Dolchok Ln Kenai, AK 99611

Submitted By

Andy Hall

Submitted On

10/8/2019 8:37:59 PM

Affiliation

KPFA

PC088
1 of 2

The Kenai Peninsula Fishermen's Association strongly encourages the Alaska Board of Fisheries to uphold Policy 2018-289FB, which sets the meeting schedule on a rotating basis between Anchorage, the Kenai Peninsula and the Matsu. The Kenai Peninsula is home to the streams and rivers that nurture the great salmon runs of upper Cook Inlet and to the majority of the people who make their livings harvesting, processing, and otherwise capitalizing on these vital fish. Finfish meetings have not been hosted on the Kenai Peninsula for more than 20 years. The men and women represented by KPFA feel that a Kenai Peninsula meeting will give local fishing groups, businesses as well as commercial and private fishers the opportunity to take part in this important public process.

The misguided decision to ignore policy 2018-289FB and move the meeting back to Anchorage occurred without public notice and under the direction of board Chair Reed Morisky. We feel Mr. Morisky has violated the public trust and should be replaced as chairman by a board member who understands and respects the public process. As the Alaska Board of Fisheries members, both new and old, selects its officers, we encourage you to choose a new chairman who can lead the board in an ethical manner and restore the public trust.

As the organization that represents more than 735 limited entry permit holders and over 500 individual family businesses that operate on the Kenai Peninsula, we feel that the board process works only when an informed and trustworthy individual is leading the board, and that the meetings are periodically held in the communities adjacent to the resource. These meetings affect all of KPFA's members as well as the thousands of people who are directly and indirectly touched by the Peninsula's salmon-driven economy. It's only right that the meeting be held where the majority of these fisheries take place and within reach of the Alaskans who are impacted the most by the decisions made by the Board of Fish.

Seven full board cycles—21 years—have passed since the Kenai Peninsula has hosted the Upper Cook Inlet Finfish Meeting. Here are a few of the reasons that we feel it is imperative that they be held here for the 2020 board cycle:

- Citizens of the City of Kenai and the community of Kasilof, who are directly impacted by the tens of thousands of personal use fishers who descend on their communities each summer to harvest salmon, have had few opportunities to give input on management of those fisheries because the meetings are now held exclusively in Anchorage.
- The majority of the sportfishing activities in Upper Cook Inlet occur on the Kenai Peninsula, yet Peninsula residents have repeatedly had limited access to the Board of Fisheries process which grows more and more anchored to Anchorage.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the 130-year-old commercial salmon fisheries has all but disappeared from the Board of Fish process.
- For those same reasons, the local and traditional knowledge regarding centuries-old subsistence fisheries has all but disappeared from the Board of Fish process.
- Peninsula businesses that prosper from, and support the commercial, sport and subsistence lifestyles throughout the year would benefit from taking part the deliberations made at these meetings.
- If the meeting is held on the Kenai Peninsula, local businesses including hotels, restaurants, B & B's, retail stores, and gas stations among others, will benefit from the winter boost in revenue during an otherwise slow time of year.
- The Kenai Peninsula is home to the many of Upper Cook Inlet's Fish and Game Advisory Committees, Aquaculture, Conservation and Fishing associations and their participation will be enhanced.
- The Kenai and Kasilof rivers run through the Kenai Peninsula Borough and thus all of the sport, personal use and subsistence fisheries supported by those rivers occur within the borough.
- The entire East Side Setnet fishery is conducted within the Kenai Peninsula Borough.
- The entire Drift Fishery is conducted in the Kenai Peninsula Borough.
- All Personal Use Fisheries on the Kenai Peninsula occur within the Kenai Peninsula Borough.
- Virtually all Upper Cook Inlet Saltwater Sport Fisheries are conducted within the Kenai Peninsula Borough.
- The Kenai Peninsula Borough has 44 schools with 8950 students who would benefit from the experience of attending a Board of Fisheries meeting in or near their own hometowns.

For these reasons and many more, the Board of Directors of the Kenai Peninsula Fisherman's Association strongly urges the Alaska Board of Fisheries to hold its 2020 Upper Cook Inlet Finfish meetings on the Kenai Peninsula.

For more than two decades the people of the Kenai Peninsula have been marginalized, excluded from the Board of Fish process by distance, cost, and inconvenience, please don't let that continue.

Respectfully

Kenai Peninsula Fishermen's Association Board of Directors



RE: UCI meeting location

Dear BOF Board Members, I would like to take this opportunity to provide comment and support for Board member Al Cain's proposal to rotate future UCI Finfish meetings between Kenai / Soldotna, Palmer / Wasilla, and Anchorage by returning the 2020 UCI meeting location to the Kenai / Soldotna area.. It should be noted that the past two Governors, Parnell and Walker, have requested the Board to make similar concessions towards a fairer system of selecting UCI meeting locations. Throughout the 2014 and 2017 UCI BOF meetings I continually requested various board members to evaluate the attending audience to get a sense of where the attending participants were from. It was very obvious that after the public testimony portion of the meeting almost all in attendance were from the Kenai Peninsula area. This only makes sense because 85% of the nearly 300 proposals are for the Kenai and Kasilof rivers or immediate offshore waters. These are the people that have the most involvement in the issues at hand in UCI fishery decisions. What doesn't make any sense is that none of these meetings have been held in the Kenai / Soldotna area for nearly 20 years. Please ask yourself how you would like it if meetings for Kodiak, Bristol Bay, Fairbanks or the AYK were always held in Anchorage because a minority of power players want it that way so that they can have a better chance at controlling the outcome if local participation is minimized by time and travel expenses necessary to attend. The BOF has a mandate to try to hold their meetings closest to the fisheries involved in these critical meetings. By the sheer volume of proposals related to the Kenai Peninsula waters it would infer that the Kenai / Soldotna area should be an obvious location for this meeting. Private anglers do not have any commercial interest or concerns in the outcome of these meetings so the financial burdens to attend an Anchorage meeting makes it financially impossible to attend. At the 2014 meeting, Chairman Johnstone, eluded to the fact that people who filed proposals should be present to defend them. That is financially impractical for most from the Kenai area when the meetings are always held in Anchorage. I hope all of you will understand that a private angler is different from a guide or a commercial fisherman in that they do not have any financial gain in the outcome of their proposals, so for them to come to Anchorage to give 3 minutes of testimony and stay around for 4-5 days to serve in the committee process would cost them between 500 – 1,000 dollars. I hope you can see by this example why private anglers from the Kenai area are largely excluded from the process when the meeting is held in Anchorage. Roughly 95% of the attending audience on any given day after public testimony was from the Kenai area so you can imagine the total financial burden on Kenai area individuals and organizations. It has been mentioned in the past that Anchorage is a good central location but central for who? It's a simple fact that Anchorage and MATSU folks simply don't attend these meetings very much. Many Kenai area residents, municipalities and organizations have continually offered this solution of rotating meetings for Board consideration but it has always been voted down. I think this is a fair and equitable solution for all concerned with UCI Fishery issues and one that should be completely supported by the board. I hope you will give this careful consideration and support the original location for the 2020 UCI meeting to be held in the Kenai / Soldotna area. Thank you for your time and consideration in this matter. Respectfully Submitted, Dwight Kramer

RE: UCI meeting location

A legitimate public process does not exclude or discriminate. The exclusions of Kenai Peninsula residents for 20 YEARS, yes two decades, would never be tolerated by any other region in the state. The influence of KRSA also casts a shadow on this process as does the recent Open Meetings Act violation. The rhetoric about Cook Inlet is inflammatory, as if to mitigate the exclusion of an entire generation, a voice silenced by the lack of access to a once vital public process. I would encourage the board to reach out and deliberate in Soldotna in 2020. Even on a rotating basis many users could not endure two weeks in Anchorage. Over the years many changes to the board process have added time to meetings. My thoughts, not so succinctly but sincerely sent, John McCombs Ninilchik Alaska. As an individual .



Monday, September 30, 2019

Reed Morisky, Chair
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

Dear Chairman Morisky and Members of the Alaska Board of Fisheries:

Thank you for the opportunity to provide public comments, and for reconsidering the Board's decision regarding the 2020 Upper Cook Inlet (UCI) Finfish meeting location. In approving Policy 2018-289FB¹, the Board previously recommended that UCI Finfish meetings rotate between Kenai/Soldotna, Palmer/Wasilla, and Anchorage on a 3-year cycle. The policy further recommended the February 2020 meeting be held in Kenai or Soldotna. We are writing to let you know that a suitable meeting venue is still available, and we remain committed to hosting the 2020 UCI Finfish meeting.

Local governments on the Kenai Peninsula have long-advocated for the Board to hold a Upper Cook Inlet Finfish meeting on the Peninsula (see attached joint Resolution 2018-001), because 75% to 85% of all UCI Finfish proposals affect Kenai Peninsula watersheds. And yet, the Board has not held a full meeting in our area since 1999. That decision, to hold the meetings in Anchorage for the past six cycles rather than rotating then between affected communities, is inconsistent with how the board treats other Finfish meetings as shown in the table below.

Lower Cook Inlet	Southeast and Yakutat	Bristol Bay	Arctic / Yukon / Kuskokwim	PWS / Upper Copper River / Upper Susitna
Seward (2019) Homer (2016) Anchorage (2013) Homer (2010) Homer (2007) Anchorage (2004)	Sitka (2018) Sitka (2015) Ketchikan (2012) Sitka (2009) Ketchikan (2006)	Dillingham (2018) Anchorage (2015) Naknek (2012) Anchorage (2009) Dillingham (2006) Anchorage (2003)	Anchorage (2019) Fairbanks (2016) Anchorage (2013) Fairbanks (2010) Anchorage (2007) Fairbanks (2004)	Valdez (2017) Cordova (2014) Valdez (2011) Cordova (2008)

The policy to also rotate UCI Finfish meetings is reasonable, and responsive to the concerns shared by Kenai Peninsula residents over the past two decades. Like the Board does for other Alaskans around the State, it is important to ensure our residents also have periodic access to the Board deliberation and

¹ 2018-289-FB was adopted March 9th, 2018 at the Statewide Dungeness Crab, Shrimp, and Misc. Shellfish mtg.



decision-making process. Rotating the meeting location between Anchorage, the Kenai Peninsula, and the Mat-Su Valley would be consistent with how the Board conducts its other finfish meetings.

There are several meeting venues in Kenai/Soldotna that are large enough, and well-configured to hold the UCI Finfish meeting. These facilities have good cell service and internet connectivity, audio/visual equipment, and are staffed by experienced personnel who support a variety of large events and professional meetings.

Beyond the meeting venue itself, our area is easily accessible for the Board Members, support staff, and the public who could fly or drive to the area to attend the meeting. The Kenai Municipal Airport is a full-service airport, with more than 20 flights to/from Anchorage per day and multiple regional air carriers. Our communities are conveniently located on the road system, just 2.5 hour drive from Anchorage. There are more than 400 hotel rooms in the immediate area, and many more small B+B's and independent lodge operators. Lastly, there are numerous quality restaurants within walking and/or short driving distance from the meeting space. For visitor amenities and meeting logistics support, our area is well served.

We understand cost is an important consideration. The Cities of Kenai and Soldotna, and the Kenai Peninsula Borough have committed to offering the meeting venue at no cost to the State. In corresponding with your support staff about the different logistical needs and potential expenses, we learned that the overall cost of hosting the meeting in the central Kenai Peninsula is likely to be significantly lower than a comparable meeting held in Anchorage.

There are nearly 40,000 residents in the Central Kenai Peninsula, many of whom are deeply invested in the outcomes and work of the Board of Fisheries. We know the Board regularly rotates meetings among various stakeholder communities throughout the state, ensuring that ordinary Alaskans have access to this important process. We encourage you to stand by your 2018 policy, to rotate the UCI Finfish meetings as well, and meet on the Kenai in 2020. Our community has the facilities and amenities needed to host a successful event, and we look forward to your decision at your work session later this month.

Sincerely,


Stephanie Queen, City Manager
City of Soldotna


Mayor Charlie Pierce
Kenai Peninsula Borough


Paul Ostrander, City Manager
City of Kenai

Cc: John Jensen
Israel Payton
Fritz Johnson
Marit Carlson-Van Dort
John Wood
Gerad Godfrey
Glenn Haight



**KENAI PENINSULA BOROUGH
CITY OF KENAI
CITY OF SOLDOTNA**

JOINT RESOLUTION NO. 2018-001

**A JOINT RESOLUTION OF THE ASSEMBLY OF THE KENAI PENINSULA
BOROUGH AND COUNCILS OF THE CITY OF KENAI AND THE CITY OF SOLDOTNA,
REQUESTING THE ALASKA BOARD OF FISHERIES TO ADOPT A POLICY TO ROTATE
THE REGULAR UPPER COOK INLET FINFISH MEETINGS BETWEEN THE THREE
PRINCIPAL COMMUNITIES OF KENAI/SOLDOTNA, PALMER/WASILLA, AND
ANCHORAGE**

- WHEREAS,** Upper Cook Inlet Finfish issues are vitally important to, and directly impact residents, municipal governments and communities on the Kenai Peninsula; and
- WHEREAS,** many local residents and businesses of the Kenai Peninsula depend on, participate in, and are otherwise affected by decisions made by the Board of Fisheries with regard to subsistence fisheries, sport fisheries, commercial fisheries, personal use fisheries and conservation measures in Upper Cook Inlet; and
- WHEREAS,** when making informed decisions regarding finfish issues in Upper Cook Inlet, the Board of Fisheries should consider the comments and interests from residents of the Kenai Peninsula; and
- WHEREAS,** the costs and travel time to attend meetings outside the Kenai Peninsula pose a significant burden to local residents, limiting participation and the Board of Fisheries' ability to benefit from local knowledge; and
- WHEREAS,** the Alaska Board of Fisheries has not held a regular Upper Cook Inlet Finfish meeting on the Kenai Peninsula since 1999 despite numerous requests that it do so; and
- WHEREAS,** holding the meeting on the Kenai Peninsula would show local residents, businesses and communities that the Alaska Board of Fisheries listens, cares about, and understands the local impacts of its decisions; and
- WHEREAS,** there are local quality venues of sufficient size with advanced technologic capabilities to host public meetings, as well as exceptional lodging and dining opportunities on the Kenai Peninsula.

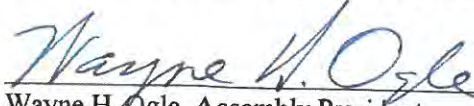
NOW, THEREFORE, BE IT RESOLVED BY THE KENAI PENINSULA BOROUGH ASSEMBLY AND THE COUNCILS FOR THE CITY OF KENAI AND CITY OF SOLDOTNA:

- SECTION 1.** That the Alaska Board of Fisheries is respectfully and strongly urged by the Kenai Peninsula municipal governments representing their constituents to adopt a policy to rotate the Upper Cook Inlet Finfish meetings between the three principal communities of Kenai/Soldotna, Palmer/Wasilla, and Anchorage.
- SECTION 2.** That this Joint Resolution be forwarded to Governor Bill Walker, Senator Peter Micciche, Representative Gary Knopp, Representative Paul Seaton, Representative Mike Chenault, Governor's Chief of Staff Scott Kendall, Alaska Department of Fish and Game Commissioner Sam Cotton, Alaska Board of Fisheries members John Jensen, Reed Morisky, Orville Huntington, Alan Cain, Israel Payton, Robert Ruffner, Fritz Johnson, Alaska Board of Fisheries Executive Director Glenn Haight.



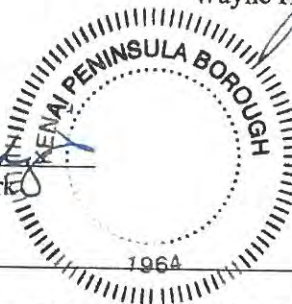
SECTION 3. That this resolution takes effect immediately upon approval by the Kenai Peninsula Borough Assembly and the participating city councils.

APPROVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH THIS 20TH DAY OF FEBRUARY, 2018.


Wayne H. Ogle, Assembly President

ATTEST:

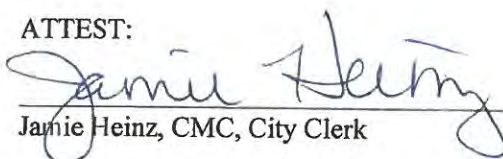

Johni Blankenship, MMC, Borough Clerk



APPROVED BY THE COUNCIL OF THE CITY OF KENAI THIS 7TH DAY OF FEBRUARY, 2018.


Brian Gabriel, Sr., Kenai Mayor

ATTEST:

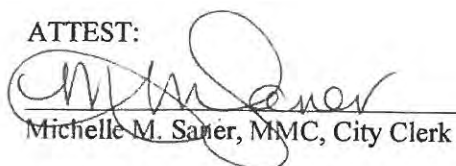

Jamie Heinz, CMC, City Clerk



APPROVED BY THE COUNCIL OF THE CITY OF SOLDOTNA THIS 14TH DAY OF FEBRUARY, 2018.


Nels Anderson, Soldotna Mayor

ATTEST:


Michelle M. Sauer, MMC, City Clerk





**Alaska Department of Fish and Game
Board of Fisheries**

PO Box 115526

Juneau, AK 99811-5526

(907) 465-4110

www.adfg.alaska.gov

**ALASKA BOARD OF FISHERIES
Policy Regarding the Location of the Upper Cook Inlet Finfish Meeting**

2018-289-FB

The Alaska Board of Fisheries (board) notes one of the most divisive issues it faces almost every year is not a regulatory subject, but rather where to hold the Upper Cook Inlet Finfish meeting. Boards since 1999 have chosen to hold this two-week long meeting in Anchorage. Other communities, principally Kenai/Soldotna, would like to host the meeting. While the board recognizes it cannot obligate future boards by its current decisions, it offers the following meeting schedule as a way to manage this ongoing issue.

The board recommends future boards rotate the Upper Cook Inlet Finfish meeting between the three principle communities of Kenai/Soldotna, Palmer/Wasilla, and Anchorage. This policy contemplates the meeting will rotate between these three communities throughout its 3-year meeting cycle. The board recommends holding the 2020 meeting in Kenai/Soldotna, the 2023 meeting in Wasilla/Palmer, and the 2026 meeting in Anchorage.

Adopted this 9th day of March 2018.

John E. Jensen
Chair, Alaska Board of Fisheries
Vote: 4-2 (1 Absent)

Submitted By

Lisa Gabriel

Submitted On

10/6/2019 1:22:54 PM

Affiliation

Resident of Kenai/Eastside Setnetter

Phone

907-252-9524

Email

lisajgabriel@gmail.com

(mailto:lisajgabriel@gmail.com)

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Kenai, Alaska 99611

PC092
1 of 2

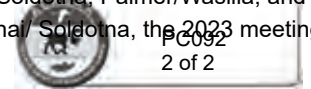
Dear Alaska Board of Fisheries Member:

I encourage you to vote at the 2019 October BOF Work Session to return the location of the 2020 Upper Cook Inlet Finfish meeting to the Kenai Peninsula location of Kenai/Soldotna and to stand by **Policy 2018-289FB1**, adopted March 9, 2018, to rotate the meetings between Kenai, Wasilla and Anchorage.

Boards since 1999 have chosen to hold this two-week long meeting in Anchorage. Other communities, principally Kenai/Soldotna, would like to host the meeting. Below are the reasons I support the 2020 Upper Cook Inlet Board of Fisheries meeting location be held in Kenai/Soldotna:

- **The Board has not held a full Upper Cook Inlet Finfish meeting in the Kenai/Soldotna area since 1999.**
- **75% to 85%** of all UCI Finfish proposals affect Kenai Peninsula watersheds.
- The Citizens of the City of Kenai and the community of Kasilof, who are directly impacted by the tens of thousands of personal use fishers who descend on their communities each summer to harvest salmon, have had few opportunities to give input on management and discuss their impact, because the meetings are held **exclusively** in Anchorage.
- The majority of the **sportfishing activities** in Upper Cook Inlet occur on the Kenai Peninsula, yet its residents have repeatedly had limited access to the Board of Fisheries process which grows more and more anchored to Anchorage.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the 130-year-old **commercial salmon fisheries** has all but disappeared from the Board of Fish process.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the regarding centuries-old **subsistence fisheries** has all but disappeared from the Board of Fish process.
- Peninsula businesses that prosper from, and support the commercial, sport and subsistence lifestyles throughout the year would benefit from taking part the deliberations made at these meetings.
- If the meeting is held in Kenai/Soldotna, local businesses including hotels, restaurants, B & B's, retail stores, and gas stations among others, will benefit from the winter boost in revenue during an otherwise slow time of year.
- The Kenai Peninsula is home to the many of Upper Cook Inlet's Fish and Game Advisory Committees, Aquaculture, Conservation and Fishing associations and their participation will be enhanced.
- The Kenai and Kasilof rivers run through the Kenai Peninsula Borough and thus all of the sport, personal use and subsistence fisheries supported by those rivers occur within the borough.
- The entire East Side Setnet fishery is conducted within the Kenai Peninsula Borough.
- The entire Drift Fishery is conducted in the Kenai Peninsula Borough.
- All Personal Use Fisheries on the Kenai Peninsula occur within the Kenai Peninsula Borough.
- Virtually all Upper Cook Inlet Saltwater Sport Fisheries are conducted within the Kenai Peninsula Borough.
- The Kenai Peninsula Borough has 44 schools with 8950 students who would benefit from the experience of attending a Board of Fisheries meeting in or near their own hometowns.
- There are several meeting venues in Kenai/Soldotna that are large enough, and well-configured to hold the UCI Finfish meeting. These facilities have good cell service and internet connectivity, audio/visual equipment, and are staffed by experienced personnel who support a variety of large events and professional meetings.
- The area is accessible for the Board Members, support staff, and the public who could fly or drive to the area to attend the meeting. The Kenai Municipal Airport is a full service airport, with more than 20 flights to/from Anchorage per day and multiple regional air carriers.
- There are numerous quality restaurants within walking and/or short driving distance from the meeting space.
- There are nearly 40,000 residents in the Central Kenai Peninsula, many of whom are deeply invested in the outcomes and work of the Board of Fisheries.
- **Policy 2018-289FB1** addressing the rotation of UCI Finfish meetings, is reasonable and responsive to the concerns shared by Kenai Peninsula residents over the past two decades. Like the Board does for other Alaskans in communities around the state, it is important to ensure that Kenai Peninsula residents also have periodic access to the Board deliberation and decision-making process. Rotating the meeting location between Anchorage, the Kenai Peninsula and the Mat-Su Valley, would be consistent with how other finfish meetings are **routinely** scheduled.
- The decision, to hold the UCI meetings in Anchorage for the past six cycles rather than rotating them between affected communities, is inconsistent with how the board treats other Finfish meetings.

In approving **Policy 2018-289FB1**, the Board previously recommended that UCI Finfish meetings rotate between Kenai/Soldotna, Palmer/Wasilla, and Anchorage on a 3-year cycle. I support **Policy 2018-289FB1**. The board recommended holding the 2020 meeting in Kenai/ Soldotna, the 2023 meeting in Wasilla/Palmer, and the 2026 meeting in Anchorage.



The Alaska Board of Fisheries (board) noted in **Policy 2018-289FB1** that it regularly rotates meetings among various stakeholder communities throughout the state, ensuring that ordinary Alaskans have access to this important process. The Alaska Board of Fisheries (board) stated in **Policy 2018-289FB1** that one of the most divisive issues it faces almost every year is not a regulatory subject, but rather **where to hold the Upper Cook Inlet Finfish meeting**. The board recommended future boards rotate the Upper Cook Inlet Finfish meeting between the three principle communities of Kenai/Soldotna, Palmer/Wasilla, and Anchorage. **Policy 2018-289FB1** contemplates the meeting will rotate between these three communities throughout its 3-year meeting cycle.

For more than two decades the **ordinary people** of the Kenai Peninsula have been marginalized, excluded from the Board of Fish process by distance, cost, and inconvenience, simply because of where they live. Please don't let that continue. I request that you vote to return the 2020 Upper Cook Inlet Finfish Meeting location to Kenai/Soldotna and I encourage you to stand by **Policy 2018-289FB1** as adopted March 9, 2018.

Respectfully,

Lisa Gabriel

Submitted By

Loren Leman

Submitted On

10/8/2019 11:59:41 AM

Affiliation

Fisherman and family patriarch

Phone

(907) 243-2000

Email

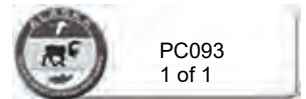
loren@lorenleman.com

(mailto:loren@lorenleman.com)

Address

2699 Nathaniel Ct

Anchorage, Alaska 99517



I encourage you to honor your own Policy 2018-289FB1 and rotate your meetings among the three locations--Anchorage, Kenai Peninsula, and Matanuska-Susitna. Please reconsider your previous action and instead go with your original plan to hold your 2020 meeting for Upper Cook Inlet finfish proposals in the Kenai-Soldotna area.

The fine folks in this area have demonstrated their ability to host large meetings, conventions, and athletic events with their cordial and competent hospitality and ample venues. Many of the issues to be considered directly impact people on the Peninsula, so making this change would allow more of these people to participate.

Although I was raised on the Kenai Peninsula and we still operate our family fishing business there, Carolyn and I live in Anchorage. This change might make it a bit less convenient for us to participate, but we believe the change to the Kenai-Soldotna location is important for most people affected. Please honor your own policy.

Best wishes with your decision and the meeting itself.

RE: UCI meeting location

Please think on starting your 14 day meeting for UCI with the Mat-Su Valley first being that's where the fish are being reared. If we start at the top and go south maybe we will get some fish back into the Susitna River system and all our stocks will start to recover. Ever since we stopped putting fish up the Susitna River system we've had declining stocks. All previous meeting the BOF starts with the Kenai River and there's no fish left for the Mat-Su Valley streams. It's time to change this. Take the giant step forward and do this. Thank you, Neil DeWitt Anchorage and Mat Valley AC's



North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

To: State of Alaska Board of Fisheries
Re: Miscellaneous Business regarding UCI BoF Meeting Location

October 8, 2019

Dear Chairman Morisky and Members of the Board of Fisheries,

The North Pacific Fisheries Association (NPFA) was founded in 1955 and represents over sixty Alaskan fishing operations. NPFA has a long history of supporting conservative, science based fisheries management and has demonstrated this philosophy by engaging with the regulatory bodies from local to international. NPFA strives to involve and connect fishermen with the boards, commissions, councils and legislative bodies that directly affect our livelihoods. One of the main hurdles to participation of individuals is the time and expense of travelling to meeting locations. We strongly support having meeting locations in fishing communities as much as practical. The North Pacific Fisheries Management Council is holding one of it's meeting in Homer as I write this. The event seems very successful in engaging fisherman and giving the regulators direct experience in a fishing community.

NPFA requests the Board of Fisheries restore the 2020 Upper Cook Inlet Finfish Meeting location to Kenai

NPFA appreciates and supports the Alaska Board of Fisheries "Policy Regarding the Location of the Upper Cook Inlet Finfish Meeting 2018-289-FB". This rotating schedule allows stakeholders from many regions to participate in the process. We hope the Board will continue to abide by this policy. Thank you for the consideration.

Respectfully,



G Malcolm Milne

President, North Pacific Fisheries Association

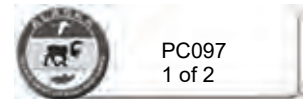


RE: UCI meeting location

Dear Members of the Alaska Board of Fisheries, I am writing to you today in regards to Policy 2018-289B that was created to hold meetings on a rotation schedule between Anchorage, the Kenai Peninsula and Mat-Su. This policy not only takes the politics out of meeting locations, but also allows those who typically travel to attend the scheduled 2 week meeting, the opportunity to stay closer to home and allows those who would otherwise be unable to travel for this amount of time, the opportunity to attend, thus allows connections with more stakeholders than a typically meeting would. We ask that this meeting location on the Kenai Peninsula, be treated no differently than Sitka, Dillingham, Valdez, Kodiak, Seward, Homer, Bethel, Wrangell, Cordova, Juneau, and Girdwood all towns where Board of Fish meetings have taken place. The Peninsula hosted a successful Upper Cook Inlet Task Meeting in 2013 and we hope that we can continue this fair trend. Kenai Peninsula stakeholders have been asking for a meeting in our community for over two decades. Our fisheries on the Kenai Peninsula have changed rapidly over the years and we would hope that the Board of Fish Members would choose to spend time in the community that they are making these very important decisions for. Governor Parnell, Governor Walker, multiple legislators and hundreds of stakeholders have asked for a meeting on the Kenai Peninsula for years. Please do what is right and uphold Policy 2018-289B and vote to hold the 2020 Board of Fisheries meeting on the Peninsula. Thank you for your time, Sarah Frostad-Hudkins PO BOX 1116 Kenai, Alaska 99611

Submitted By
SHEILA GARRANT
Submitted On
10/7/2019 4:59:59 PM
Affiliation

Phone
518-578-5145
Email
AKGARRANT@HOTMAIL.COM
(mailto:AKGARRANT@HOTMAIL.COM)
Address
PO BOX 107
KASILOF, Alaska 99610



October 7, 2019

To the Alaska Board of Fisheries Member:

I ask that you vote at the 2019 October BOF Work Session to **return the location of the 2020 Upper Cook Inlet Finfish meeting to the Kenai Peninsula location of Kenai/Soldotna and to stand by Policy 2018-289FB1**, adopted March 9, 2018, to rotate the meetings between Kenai, Wasilla and Anchorage.

Boards, since 1999, have chosen to hold this two-week long meeting in Anchorage. Other communities, principally Kenai/Soldotna, would like to host the meeting.

- **The Board has not held a full Upper Cook Inlet Finfish meeting in the Kenai/Soldotna area since 1999.**
- **75% to 85%** of all UCI Finfish proposals affect Kenai Peninsula watersheds.
- The citizens of the city of Kenai and the community of Kasilof, who are directly impacted by the tens of thousands of personal use fishers who descend on their communities each summer to harvest salmon, have had few opportunities to give input on management and discuss their impact, because the meetings are held **exclusively** in Anchorage.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the 130-year-old **commercial salmon fisheries** has all but disappeared from the Board of Fish process.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is **cost-prohibitive**, the tremendous resource of local and traditional knowledge regarding the regarding the various fisheries has all but disappeared from the Board of Fish process.
- Peninsula businesses that prosper from, and support the commercial, sport and subsistence lifestyles throughout the year would benefit from taking part the deliberations made at these meetings.
- The Kenai Peninsula is home to the many of Upper Cook Inlet's Fish and Game Advisory Committees, Aquaculture, Conservation and Fishing associations and their participation will be enhanced.
- The Kenai and Kasilof rivers run through the Kenai Peninsula Borough and thus all of the sport, personal use and subsistence fisheries supported by those rivers occur within the Borough.
- The entire east side setnet fishery is conducted within the Kenai Peninsula Borough.
- The entire drift fishery is conducted in the Kenai Peninsula Borough.
- All personal use fisheries on the Kenai Peninsula occur within the Kenai Peninsula Borough.
- Virtually all Upper Cook Inlet saltwater sport fisheries are conducted within the Kenai Peninsula Borough.
- The Kenai Peninsula Borough has 44 schools with 8950 students who would benefit from the experience of attending a Board of Fisheries meeting in or near their own hometowns.
- There are several meeting venues in Kenai/Soldotna that are large enough, and well-configured to hold the UCI Finfish meeting. These facilities have good cell service and internet connectivity, audio/visual equipment, and are staffed by experienced personnel who support a variety of large events and professional meetings.
- The area is accessible for the Board Members, support staff, and the public who could fly or drive to the area to attend the meeting. The Kenai Municipal Airport is a full service airport, with more than 20 flights to/from Anchorage per day and multiple regional air carriers.
- There are numerous quality restaurants within walking and/or short driving distance from the meeting space.
- There are nearly 40,000 residents in the Central Kenai Peninsula, many of whom are deeply invested in the outcomes and work of the Board of Fisheries.
- **Policy 2018-289FB1** addressing the rotation of UCI Finfish meetings, is reasonable and responsive to the concerns shared by Kenai Peninsula residents over the past two decades. Like the Board does for other Alaskans in communities around the state, it is important to ensure that Kenai Peninsula residents also have periodic access to the Board deliberation and decision-making process. Rotating the meeting location between Anchorage, the Kenai Peninsula and the Mat-Su Valley, would be consistent with how other finfish meetings are **routinely** scheduled.
- The decision, to hold the UCI meetings in Anchorage for the past six cycles rather than rotating them between affected communities, is inconsistent with how the board treats other Finfish meetings.
- In approving **Policy 2018-289FB1**, the Board previously recommended that UCI Finfish meetings rotate between Kenai/Soldotna, Palmer/Wasilla, and Anchorage on a 3-year cycle. I support **Policy 2018-289FB1**. The board recommended holding the 2020 meeting in Kenai/ Soldotna, the 2023 meeting in Wasilla/Palmer, and the 2026 meeting in Anchorage.

- The Alaska Board of Fisheries (board) noted in **Policy 2018-289FB1** that it regularly rotates meetings among various stakeholder communities throughout the state, ensuring that ordinary Alaskans have access to this important process. The Alaska Board of Fisheries (board) stated in **Policy 2018-289FB1** that one of the most divisive issues it faces almost every year is not a regulatory subject, but rather **where to hold the Upper Cook Inlet Finfish meeting**. The board recommended future boards rotate the Upper Cook Inlet Finfish meeting between the three principle communities of Kenai/Soldotna, Palmer/Wasilla, and Anchorage. **Policy 2018-289FB1** contemplates the meeting will rotate between these three communities throughout its 3-year meeting cycle.
- For more than **two decades the ordinary people of the Kenai Peninsula have been marginalized, excluded from the Board of Fish process by distance, cost, and inconvenience, simply because of where they live**. Please don't let that continue. I request that you vote to return the 2020 Upper Cook Inlet Finfish Meeting location to Kenai/Soldotna and I encourage you to stand by **Policy 2018-289FB1** as adopted March 9, 2018.

Sheila Garrant

Kasilof, Alaska

907-262-5155

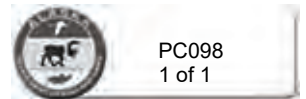
518-578-5145

Submitted By

Tanya Doner

Submitted On

10/8/2019 10:35:53 AM

Affiliation

I encourage the board to stick by the original policy adopted in 2018 by rotating where upper cook inlet meetings are held on a rotational basis. The upper cook inlet finfish meeting directly impacts the people of the kenai peninsula. And if they can not afford to come to Anchorage they are not able to participate or give input into policy/management decisions. It has been 20 years since the BOF have held a meeting there and it is time to make changes.

Submitted By

Ted Crookston

Submitted On

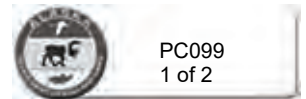
10/8/2019 9:11:02 AM

Affiliation

Setnet Fishery (Multi Generation)

Phone

8017258321

Emailtedcrookston@me.com
(mailto:tedcrookston@me.com)**Address**53509 Veco Ave
Kenai, Alaska 99611

Dear Alaska Board of Fisheries Member:

I know you have seen the following letter. The points and issues raised ARE VALID. I FULLY SUPPORT this letter and ask you to vote accordingly. I have been involved for 55 fishing seasons. I understand the issue.

I encourage you to vote at the 2019 October BOF Work Session to return the location of the 2020 Upper Cook Inlet Finfish meeting to the Kenai Peninsula location of Kenai/Soldotna and to stand by **Policy 2018-289FB1**, adopted March 9, 2018, to rotate the meetings between Kenai, Wasilla and Anchorage.

Boards since 1999 have chosen to hold this two-week long meeting in Anchorage. Other communities, principally Kenai/Soldotna, would like to host the meeting. Below are the reasons I support the 2020 Upper Cook Inlet Board of Fisheries meeting location be held in Kenai/Soldotna:

- **The Board has not held a full Upper Cook Inlet Finfish meeting in the Kenai/Soldotna area since 1999!**
- **75% to 85%** of all UCI Finfish proposals affect Kenai Peninsula watersheds.
- The Citizens of the City of Kenai and the community of Kasilof, who are directly impacted by the tens of thousands of personal use fishers who descend on their communities each summer to harvest salmon, have had few opportunities to give input on management and discuss their impact, because the meetings are held **exclusively** in Anchorage.
- The majority of the **sportfishing activities** in Upper Cook Inlet occur on the Kenai Peninsula, yet its residents have repeatedly had limited access to the Board of Fisheries process which grows more and more anchored to Anchorage.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the 130-year-old **commercial salmon fisheries** has all but disappeared from the Board of Fish process.
- By holding the meetings far from those who best know the fisheries, and because attending a two-week meeting in Anchorage is cost-prohibitive, the tremendous resource of local and traditional knowledge regarding the regarding centuries-old **subsistence fisheries** has all but disappeared from the Board of Fish process.
- Peninsula businesses that prosper from, and support the commercial, sport and subsistence lifestyles throughout the year would benefit from taking part the deliberations made at these meetings.
- If the meeting is held in Kenai/Soldotna, local businesses including hotels, restaurants, B & B's, retail stores, and gas stations among others, will benefit from the winter boost in revenue during an otherwise slow time of year.
- The Kenai Peninsula is home to the many of Upper Cook Inlet's Fish and Game Advisory Committees, Aquaculture, Conservation and Fishing associations and their participation will be enhanced.
- The Kenai and Kasilof rivers run through the Kenai Peninsula Borough and thus all of the sport, personal use and subsistence fisheries supported by those rivers occur within the Borough.
- The entire East Side Setnet fishery is conducted within the Kenai Peninsula Borough.
- The entire Drift Fishery is conducted in the Kenai Peninsula Borough.
- All Personal Use Fisheries on the Kenai Peninsula occur within the Kenai Peninsula Borough.
- Virtually all Upper Cook Inlet Saltwater Sport Fisheries are conducted within the Kenai Peninsula Borough.
- The Kenai Peninsula Borough has 44 schools with 8950 students who would benefit from the experience of attending a Board of Fisheries meeting in or near their own hometowns.
- There are several meeting venues in Kenai/Soldotna that are large enough, and well-configured to hold the UCI Finfish meeting. These facilities have good cell service and internet connectivity, audio/visual equipment, and are staffed by experienced personnel who support a variety of large events and professional meetings.
- The area is accessible for the Board Members, support staff, and the public who could fly or drive to the area to attend the meeting. The Kenai Municipal Airport is a full service airport, with more than 20 flights to/from Anchorage per day and multiple regional air carriers.
- There are numerous quality restaurants within walking and/or short driving distance from the meeting space.
- There are nearly 40,000 residents in the Central Kenai Peninsula, many of whom are deeply invested in the outcomes and work of the Board of Fisheries.
- **Policy 2018-289FB1** addressing the rotation of UCI Finfish meetings, is reasonable and responsive to the concerns shared by Kenai Peninsula residents over the past two decades. Like the Board does for other Alaskans in communities around the state, it is important to ensure that Kenai Peninsula residents also have periodic access to the Board deliberation and decision-making process. Rotating the meeting location between Anchorage, the Kenai Peninsula and the Mat-Su Valley, would be consistent with how other finfish meetings are **routinely** scheduled.

- The decision, to hold the UCI meetings in Anchorage for the past six cycles rather than rotating them between affected communities, is inconsistent with how the board treats other Finfish meetings.



PC099
2 of 2

In approving **Policy 2018-289FB1**, the Board previously recommended that UCI Finfish meetings rotate between Kenai/Soldotna, Palmer/Wasilla, and Anchorage on a 3-year cycle. I support **Policy 2018-289FB1**. The board recommended holding the 2020 meeting in Kenai/ Soldotna, the 2023 meeting in Wasilla/Palmer, and the 2026 meeting in Anchorage.

The Alaska Board of Fisheries (board) noted in **Policy 2018-289FB1** that it regularly rotates meetings among various stakeholder communities throughout the state, ensuring that ordinary Alaskans have access to this important process. The Alaska Board of Fisheries (board) stated in **Policy 2018-289FB1** that one of the most divisive issues it faces almost every year is not a regulatory subject, but rather **where to hold the Upper Cook Inlet Finfish meeting**. The board recommended future boards rotate the Upper Cook Inlet Finfish meeting between the three principle communities of Kenai/Soldotna, Palmer/Wasilla, and Anchorage. **Policy 2018-289FB1** contemplates the meeting will rotate between these three communities throughout its 3-year meeting cycle.

For more than two decades the **ordinary people** of the Kenai Peninsula have been marginalized, excluded from the Board of Fish process by distance, cost, and inconvenience, simply because of where they live. Please don't let that continue. I request that you vote to return the 2020 Upper Cook Inlet Finfish Meeting location to Kenai/Soldotna and I encourage you to stand by **Policy 2018-289FB1** as adopted March 9, 2018.



Alex Shugak
PO Box 123
Old Harbor, AK 99643
ashugak@oldharbor.org

Alaska Board of Fisheries
1255 West 8th Street
PO Box 115526
Juneau, AK 99811

RE: Location of Kodiak Board Meeting

10/1/2019

Dear Alaska Board of Fisheries:

I have been a salmon fisherman on Kodiak Island for over 40 years. I am very concerned about proposals from Cook Inlet and Chignik fishermen that would restrict our historical salmon fishery here in Kodiak and how these proposals could negatively impact me and my community. I am planning on attending the January Board of Fisheries meeting currently scheduled to be held in Kodiak. I believe that it is important for Kodiaks salmon fishery stakeholders to have the opportunity to address the Board here in Kodiak and for you to see the magnitude of the impact your decisions may have.

I have heard rumors that some people are trying to have the Board change the location of the Kodiak meeting from Kodiak to Anchorage. I believe the Board, at your October 2017 work session, already settled this issue. I don't see anything on your October 2019 agenda that indicates you may consider moving the Kodiak meeting. Consequently, I don't think the public has been given reasonable notice of a possible move. If the meeting is moved, most Kodiak stakeholders will not be able to attend and personally engage the Board. Please continue to follow the Boards normal protocols and leave the January 2020 Alaska Board of Fisheries meeting in Kodiak.

If you have any questions regarding my support for the January Alaska Board of Fisheries meeting to be in Kodiak, please do not hesitate to contact me at ashugak@oldharbor.org or 843.957.4657.

Sincerely,


Alex Shugak



ALUTIIQ TRIBE OF OLD HARBOR

PO Box 62, Old Harbor AK 99643
Phone: (907)286-2215 fax (907)286-2350

Tribal Council Resolution 19-010

A RESOLUTION OF THE ALUTIIQ TRIBE OF OLD HARBOR IN SUPPORT OF THE ALASKA DEPARTMENT OF FISH AND GAME'S TRADITIONAL AND HISTORIC MANAGEMENT OF THE KODIAK SALMON FISHERY, AND MAINTAINING THE LOCATION OF THE JANUARY 2020 BOARD OF FISHERIES MEETING IN KODIAK

WHEREAS, the Alutiiq people were the original stewards of the land and water resources in the Kodiak Archipelago and have been the users of salmon available in the Kodiak area for more than seven thousand five hundred years; and,

WHEREAS, Ouzinkie, Port Lions, Larsen Bay, Karluk, Akhiok, Old Harbor and the Alutiiq people living in Kodiak and throughout the Kodiak Island Borough are economically and culturally dependent on the Kodiak commercial salmon fishery; and,

WHEREAS, Kodiak's six Alutiiq rural communities as well as the City of Kodiak and Kodiak Island Borough are economically struggling due, in part, to dramatically reduced groundfish quotas and substantially lower exvessel prices, including reduced salmon prices; and,

WHEREAS, Kodiak's commercial salmon fishery is an historical fishery that developed from the earliest days of commercial salmon fishing in Alaska and has remained essentially the same fishery since the implementation of limited entry in 1973; and,

WHEREAS, the State of Alaska, acting through its agents on the Board of Fisheries and in the Alaska Department of Fish and Game, is constitutionally responsible for the sustainability of salmon fisheries for the common use of all people, and to manage these fisheries with the sustained yield principle without creating any exclusive right or special privilege and based on the historical scope and practices of the fishery; and,

WHEREAS, it is critical for residents of Kodiak's Alutiiq rural communities and the City of Kodiak to continue to have harvest opportunities throughout the Kodiak Management Area and to engage in Kodiak's historical commercial salmon harvest; and,

WHEREAS, testimony before the Alaska Board of Fisheries is important for both the Alaska board of Fisheries as well as for the residents of Kodiak's Alutiiq communities because Alutiiq community residents are frequently among those most heavily impacted by fisheries decisions, and yet rarely are provided the opportunity to speak with and be heard by those constitutionally mandated to represent them and to consider their livelihoods when making allocative decisions.

"Old Harbor is a community based in rich traditions that come together to celebrate its people, culture, and heritage. We demonstrate this through our language, arts, traditional dancers and spiritual history and our respect for the Elders and honoring of our children."



ALUTIIQ TRIBE OF OLD HARBOR

PO Box 62, Old Harbor AK 99643
Phone: (907)286-2215 fax (907)286-2350

NOW, THEREFORE, BE IT RESOLVED BY ALUTIIQ TRIBE OF OLD HARBOR THAT:

Section 1: The Alutiiq Tribe of Old Harbor hereby requests the Alaska Board of Fisheries to support and maintain the Alaska Department of Fish and Game's traditional and historic management of Kodiak's salmon fisheries, which align with Alaska's Constitutional mandates of management within the sustained yield principle for the common use of all people.

Section 2: The Alutiiq Tribe of Old Harbor hereby requests the Alaska Board of Fisheries to keep the January 2020 Alaska Board of Fisheries meeting in Kodiak to provide residents Kodiak's remote Alutiiq communities reasonable opportunity to testify before the Board of Fisheries

Section 3: This resolution shall take effect immediately upon adoption.

ADOPTED BY THE ALUTIIQ TRIBE OF OLDHARBOR

THIS 26th DAY September, 2019.

CERTIFICATION

The foregoing resolution was adopted at a duly convened meeting of the Tribal Council held on September 26th, 2019, and at which a quorum was present, by a vote of **4 IN FAVOR**, _____ **AGAINST**, _____ **ABSTAINING**, and **3 ABSENT**.

Conrad Peterson, Tribal Council President
Alutiiq Tribe of Old Harbor Tribal Council

Alfred Cratty, Tribal Council Vice President
Alutiiq Tribe of Old Harbor Tribal Council

Name ART GAGNE'
Address 82103 KEITEL ST
Address INDIANO, CA.
Date 10/1/19 92201



PC102
1 of 1



Alaska Board of Fisheries
1255 West 8th St.
P.O. Box 115526
Juneau, AK 99811

Re: Location of Kodiak Board Meeting

Dear Alaska Board of Fisheries:

I am Art Gagne and I have been a salmon fisherman in Kodiak for 30 years. I am very concerned about proposals from Cook Inlet and Chignik fishermen that would restrict our historical salmon fishery here in Kodiak and how these proposals could negatively impact me and my community. I am planning on attending the January Board of Fisheries meeting currently scheduled to be held in Kodiak. I believe that it is important for Kodiak's salmon fishery stakeholders to have the opportunity to address the Board here in Kodiak and for you to see the magnitude of the impact your decisions may have.

I have heard rumors that some folks are trying to have the Board change the location of the "Kodiak" meeting from where it is currently scheduled (in Kodiak) to Anchorage. I believe the Board, at your October 2017 work session, already settled this issue. I don't see anything on your October 2019 agenda that indicates you may consider moving the Kodiak meeting. Consequently, I don't think the public has been given reasonable notice of a possible move. If the meeting is moved, most Kodiak stakeholders will not be able to attend and personally engage the Board. Please continue to follow the Board's normal protocols and leave the January 2020 Alaska Board of Fisheries meeting in Kodiak.

If you have any questions regarding my support for the January Alaska Board of Fisheries meeting to be in Kodiak, please do not hesitate to contact me.

Very truly yours,

Art Gagne

RE: Other work session business

I have made annual fishing trips to Alaska for about the past 13 years or so spending thousands of dollars every year as a non-resident - fishing 4-6 weeks and it had been very enjoyable. This summer has been the worst experience I have ever had, starting with the issues with driving to Prince Rupert to catch a ferry to Ketchikan for the first leg of our trip, to get an email when I am about 20 miles from Prince Rupert....stating "Cancellation" with no further explanation. I tried to call but could not get to anyone so the next day drove to the ferry terminal where we were supposed to catch the ferry to see it all locked up with a sign...closed due to ferry union strike. I tried for days to call and find out what was happening to no avail. Ended up driving back home, and making arrangements to fly back up for at least a couple of weeks. I know, the ferry issue is not your doing or concern, but it certainly has left a long lasting memory and has created a question whether or not I'll ever plan another trip using the Alaska ferry system again. Then, I find out when I get there, that the annual non-resident king salmon stamp I bought is worthless, because the Alaska Fisheries Department has issued an emergency order shutting down the king salmon fishing....so nonresidents are not even allowed to catch and keep one king salmon in SE Alaska where I spend my time starting August 1 - September 15. Supposedly this is to protect the fisheries? Yet I see and understand residents were still allowed to fish king salmon and keep one per day. That is unbelievable to me. It appears, that you really don't want any tourism dollars when you treat non-residents in such a manner. So my \$100 king salmon stamp is paying you to screw me over and it does not make me feel like I would ever want to come back to Alaska again, or to recommend a trip to Alaska to go fishing to anyone. What is the rational and justification for having such a regulation that treats a non-resident so poorly. If the king salmon fishery is in such a world of hurt, why can a resident keep 365 fish and a non-resident none.... And then to add to my frustration, I winterize the boat and put it back in storage so I can catch my plane home on August 17and find out the Emergency order was lifted August 15. I had asked a regional officer about a refundbecause of what happened and decided it wasn't worth the ongoing frustration to pursue it so I won't. But I do want you to pass on....my concerns about how poorly the actions of the Fisheries in Alaska are being viewed. It is not justified in any imaginable way in my opinion. The ferry union workers should be fired and fined for their actions and the combination of the ferry union and Alaska Fisheries rules makes a person wonder if it is ever worth coming back. Sorry if I sound pissed off...but that is what it is.

RE: Other work session business

get rid of the felt sole ban.....make circle hooks mandatory when using bait or beads and never mind the 2 inch distance. it will make enforcement easier and will be much safer for our beautiful rainbows and steelhead.



RE: Other work session business

Danielle Ringer & Christopher Johnson P.O. Box 151 Kodiak, AK 99615 Re: Location of January 2020 Kodiak Board Meeting Chairman Reed Morisky Alaska Board of Fisheries P.O. Box 115526 Juneau, AK 99811 Dear Chairman Morisky and Board Members, We are a young fishing family living in Kodiak and fish primarily for cod, rockfish, and salmon on the F/V North Star. As we look forward to our Kodiak January 2020 meeting we are extremely troubled by proposals coming from outside people in Cook Inlet and Chignik that aim to dismantle the traditional and historical Kodiak salmon fishery. We are planning on attending the January BOF meeting scheduled to be in Kodiak and are looking forward to participating in the public process on a range of Kodiak fisheries that will be addressed. While we do not see any specific agenda items for this October work session regarding the Kodiak meeting location we are concerned about any political push from other regions that may occur during this time to change the Kodiak venue. We adamantly oppose any such move because it would instantly eliminate opportunity for Kodiak rural community members and fishermen to speak directly to the Board and engage in person about multiple fisheries. Barriers to participate in a meeting held outside of our region include travel and lodging costs, inability to get time off from seasonal town work to travel, and stress of pulling fishermen away from families during the winter, and/or scheduling and paying for childcare outside of home community. Furthermore, with a potential Tanner season starting on January 15th fishermen can take breaks from preparing gear and come participate in a local meeting, but if it is held outside of Kodiak a large portion of the resident small boat fleet would not be able to attend and participate. Moving a meeting outside of Kodiak but focusing on Kodiak fisheries issues just does not make sense. If this does happen to come up at the work session it does not seem to us that public stakeholders would have been given reasonable notice of any official intent to discuss a meeting location change. For multiple reasons we are asking that you please follow normal and historical protocol by leaving the January 2020 Kodiak BOF meeting as scheduled in Kodiak. Keeping the meeting in Kodiak will allow for diverse Kodiak region stakeholders across multiple fisheries to participate in decisions that will directly impact their livelihoods into the future. Please do not hesitate to reach out to us if you have any questions. Respectfully, Danielle Ringer & Christopher Johnson F/V North Star



From: [Donald Johnson](#)
To:
Subject: Pink salmon
Date: Sunday, July 21, 2019 11:11:54 AM

Dear Alaska Board of Fisheries Members,

Those claiming there isn't evidence linking (Gulf of Alaska wild king / silver declines) to excessive hatchery pink) are lying. Excessive numbers of hatchery pink salmon can be directly connected to reduced numbers of wild king / silver because adult hatchery pinks prey on the same prey as wild juvenile king / silver salmon.

Those attempting to disconnect this prey connection are ignoring the fact that wild juvenile kings / silvers feed on the same prey as hatchery adult pinks in the Gulf of Alaska. Therefore a massive over-stocking of hatchery pinks can cause reduced wild king / silver numbers. So please try to get it right. Excessive Adult pinks can cause wild juvenile kings and silvers to starve to death.

Many Alaskan 10 year olds understand that adult pinks and juvenile kings / silvers feed on THE SAME PREY out in the Gulf of Alaska. That DIRECT link means stocking excessive kings / silvers will eventually cause declining pinks. And stocking excessive pinks will eventually get you declining kings / silvers. This is a direct correlation that can be the causation of low king numbers and deserves investigation.

It is a complete adfg fabrication that increased pinks will not cause reduced wild juvenile kings / silvers. Adult hatchery pinks prey on the same thing that wild juvenile kings / silvers prey on. When you reduce the prey for wild juvenile king / silver salmon you will eventually starve to death many wild juvenile kings / silvers. This all means that it is possible that Alaska's current huge increases in hatchery pinks could be causing reduced numbers of wild juvenile king and silver salmon because they feed on the same thing.

Donald Johnson
36160 Schultz Street
Soldotna, Alaska 99669
donaldjohnson@alaska.net
907 262 7893

Name ED WALTON
Address 1552 MONASHKA CIRCLE
Address KODIAK, AK 99615



PC107
1 of 1

Date 10-1-19



Alaska Board of Fisheries
1255 West 8th St.
P.O. Box 115526
Juneau, AK 99811

Re: Location of Kodiak Board Meeting

Dear Alaska Board of Fisheries:

I am ED WALTON and I have been a salmon fisherman in Kodiak for 30+ years. I am very concerned about proposals from Cook Inlet and Chignik fishermen that would restrict our historical salmon fishery here in Kodiak and how these proposals could negatively impact me and my community. I am planning on attending the January Board of Fisheries meeting currently scheduled to be held in Kodiak. I believe that it is important for Kodiak's salmon fishery stakeholders to have the opportunity to address the Board here in Kodiak and for you to see the magnitude of the impact your decisions may have.

I have heard rumors that some folks are trying to have the Board change the location of the "Kodiak" meeting from where it is currently scheduled (in Kodiak) to Anchorage. I believe the Board, at your October 2017 work session, already settled this issue. I don't see anything on your October 2019 agenda that indicates you may consider moving the Kodiak meeting. Consequently, I don't think the public has been given reasonable notice of a possible move. If the meeting is moved, most Kodiak stakeholders will not be able to attend and personally engage the Board. Please continue to follow the Board's normal protocols and leave the January 2020 Alaska Board of Fisheries meeting in Kodiak.

If you have any questions regarding my support for the January Alaska Board of Fisheries meeting to be in Kodiak, please do not hesitate to contact me.

Very truly yours,

Ed Walton



My Name is Josh Wisniewski. I live in Seldovia Alaska. I am a Cook Inlet set net permit owner. I fish in Lower Cook Inlet fishing area in the Barabara Subdistrict. I first participated in this fishery in 1994. I am also an active subsistence halibut and shellfish harvester. My written comments are in support of the two non-regulatory proposals submitted by Nancy Hillstrand, Alaska Pioneer Fisheries *EF-F19-095* and *EF-F19-097* to protect wild salmon and wild salmon fisheries in Lower Cook inlet.

As a Lower Cook Inlet set net fisherman my fishery is dependent upon the health, vitality and sustainable management of wild salmon and in particular wild Sockeye salmon originating in the Kenai and Kasilof freshwater systems. The sustainability of our fishery is not limited to meeting escapement goals, and maintaining watershed integrity but includes salmon survival in the marine environment. There is a growing body of peer reviewed scientific literature highlighting the impacts of hatchery produced salmon on the successful marine survival of wild salmon. Numerous independent scientific publications have identified declines in the size and abundance of wild salmon and a close correlation with these changes and elevated numbers of hatchery released pink salmon into the marine environment.

The health and vitality of all of our incredible Alaska subsistence and commercial fisheries are dependent on the health of our marine ecosystem. It is well documented that the Gulf of Alaska is under significant stress, from climate change, ocean acidification, and warm water events such as the Blob, and the Blob 2.0. The culmination and interactions of these factors are leading to a reduced abundance of lower trophic level marine organisms that are imperative to the successful survival of wild salmon during the stage of their life cycle they spend feeding in the marine environment. Continually releasing larger and larger numbers of pink and chum salmon fry into an already stressed marine environments increases the level of competition among all salmon in the Gulf of Alaska.

Peer reviewed scientific publications have suggested that large scale hatchery production of pink salmon are a contributing factor leading to decline in the size and abundance of wild sockeye. I personally, as well as others in my fishing area have noted a decline in size of sockeye. This can also be confirmed by the overwhelming number of fishermen switching to smaller mesh size in their drift and set gillnets. A result is that fishermen must now catch more fish to meet the equivalent poundage they were catching in the decade previous.

Continuously expanding hatchery production of pink salmon is contributing to changing the species composition in the Gulf of Alaska with the potential to contribute to trophic cascade event that could be devastating to wild salmon stocks and other finfish species.

The wide range of unknowns about salmon survival in the marine environment, the growing body of literature identifying the impacts of hatchery fish on wild stocks, and recent declines in biological productivity in the Gulf of Alaska all speak to the need to "pump the brakes" on our hatchery programs and critically evaluate how hatchery production may be having

unanticipated and previously unforeseeable impacts on wild stocks and our Alaska marine ecosystem.

Proposals *EF-F19-095* and *EF-F19-097* seek to increase the level of oversight of hatchery production in order to ensure the survival of wild salmon which, prior to hatchery programs in Alaska were the basis for all of Alaska's salmon fisheries and remain the basis for many of the commercial and subsistence fisheries across the state.

Recent unprecedented run failures in places like Chignik and on the Situk River should have us all concerned about factors that contribute to effecting salmon marine survival.

Concurrently, recent large straying events involving Prince William Sound hatchery fish spawning in Kachemak Bay in Lower Cook Inlet wild salmon systems is an issue that directly impacts the lower Cook Inlet set net fishery. I, and other local fishers have observed these impacts in systems such as Barabara Creek near where I fish, Humpy Creek further up the Bay and others. The introduction of hatchery fish genetics into wild fish populations is known to decrease the productivity of those systems. Hatchery straying into Kachemak Bay wild systems directly impacts my livelihood as a Lower Cook Inlet set net fisherman. It impacts the sustainability of our fishery and its economic viability for me as well as other Lower Cook Inlet skiff fishers.

As fishery managers ADF&G has a duty under the constitution of Alaska to sustainably manage fisheries this therefore includes the obligation to protect wild systems from straying events that compromise the integrity of those systems. Hatchery production in Prince William Sound for the economic benefit of the Prince William Sound seine fleet cannot be carried out at the expense of compromising the health of wild stocks in neighboring fishing areas and or the fishing opportunities for permit holders impacted by straying.

These proposals which include expanded and required otolith sampling seeks to hold hatchery production accountable for potential impacts on wild systems, and provide mechanisms and controls specifically designed to protect and sustain wild salmon populations for the benefit of Alaskans.

We are in unprecedented territory in terms of ecological change in Alaska and in our marine environment. Therefore, need to take bold new steps. We cannot presume to continuously put more fish into the marine environment and hope the system will correct itself. The actions outlined in *EF-F19-095* and *EF-F19-097* suggest pragmatic adjustments to protect wild fish and the integrity of our Gulf of Alaska ecosystem.

Failure, or an unwillingness of ADF&G to more effectively monitor hatcheries and protect the viability of wild stocks hails back to the era of fish trap, prior to Statehood wherein industry economic benefits trumped scientific management of salmon. The impetus for State was in large part to protect wild salmon stocks. The health and vitality of all of Alaska's fisheries are dependent upon the strength and integrity of our marine ecosystem. It is the responsibility of the Department to consider the broad potential impacts excessive hatchery production on

other salmon and fin fish species in order to support the long-term vitality of all our commercial fisheries in Alaska

Therefore, as a commercial salmon fisherman , I strongly support the Non-regulatory proposals *EF-F19-095* and *EF-F19-097*.

Thank you for your service on behalf of all Alaskans.



Alaska Board of Fish
1255 West 8TH. St.
PO Box 115526
Juneau, AK. 99811

Sept.29,2019

Re: Location of Kodiak Area Board Meeting

Dear Alaska Board of Fish:

It has come to my attention that there is some talk of moving the upcoming Kodiak meeting from Kodiak to Anchorage. I'm writing today in the hope of dissuading you from doing this. My name is Kip Thomet. I'm a long time Alaskan fisherman living in Kodiak. My wife Leigh and I have owned and operated our salmon set-net site on Kodiaks' west side for the last 29 years and derive the majority of our income from it. We employ 2 to 3 crew members, usually local Kodiakians, each year depending on ADF&G run strength forecasts. Currently I have the privilege of serving on the Kodiak Advisory Committee to the Board of Fish. I also sit on the Board of the Kodiak Aquaculture Association.

I am requesting that the meeting remain in Kodiak because the proposed changes to our management plan are so drastic and have such far reaching consequences. Salmon is a huge part of the economic picture here in Kodiak and a large part of the social fabric. To have these proposed changes taken up anywhere other than Kodiak would disenfranchise the vast majority of the Kodiak community. The effected people, not only the fishermen and their families, but also the processor workers, the business owners and employees, the support industry...In short, everyone in this Island community is connected to salmon in some way. For the Board of Fish to hold the meetings anywhere but in Kodiak would, in my opinion, be unfair and just plain wrong. Please don't deprive the Kodiak community of its entire voice.

Sincerely, Kip Thomet



A RESOLUTION IN SUPPORT OF THE ALASKA DEPARTMENT OF FISH AND GAME'S
TRADITIONAL AND HISTORIC MANAGEMENT OF THE KODIAK SALMON FISHERY, AND
MAINTAINING THE LOCATION OF THE JANUARY 2020 BOARD OF FISHERIES
MEETING IN KODIAK

WHEREAS, the Alutiiq people were the original stewards of the land and water resources in the Kodiak Archipelago and have been the users of salmon available in the Kodiak area for more than seven thousand years; and

WHEREAS, Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie, Port Lions and the Alutiiq people living in Kodiak and throughout the Kodiak Island Borough are economically and culturally dependent on the Kodiak commercial salmon fishery; and,

WHEREAS, Kodiak's six Alutiiq rural communities as well as the City of Kodiak and Kodiak Island Borough are economically struggling due, in part, to dramatically reduced ground fish quotas and substantially lower ex-vessel prices, including reduced salmon prices; and,

WHEREAS, Kodiak's salmon fishery is a historic fishery that developed from the earliest days of commercial salmon fishing in Alaska and has remained essentially unchanged since the implementation of limited entry in 1973; and,

WHEREAS, the State of Alaska, acting through its agents on the Board of Fisheries and in the Alaska Department of Fish and Game, is constitutionally responsible for the sustainability of salmon fisheries for the common use of all people, and to manage these fisheries with the sustained yield principle without creating any exclusive right or special privilege and based on the historical scope and practices of the fishery; and,

WHEREAS, it is critical for residents of Kodiak's Alutiiq rural communities and the City of Kodiak to continue to have harvest opportunities throughout the Kodiak Management Area and to engage in Kodiak's historical commercial salmon harvest; and,

WHEREAS, testimony before the Alaska Board of Fisheries is important for both the Alaska Board of Fisheries as well as for the residents of Kodiak's Alutiiq communities because Alutiiq community residents are frequently among those most heavily impacted by fisheries decisions, and yet rarely are provided the opportunity to speak with and be heard by those constitutionally mandated to represent them and to consider their livelihoods when making allocative decisions.

NOW, THEREFORE BE IT RESOLVED THAT, the Kodiak Archipelago Rural Leadership Forum, which at our September 25-27, 2019 convening had representation from 5 of Kodiak's 6 rural communities and 9 out of 10 federally recognized Tribes with a total attendance of 58 people hereby requests that the Alaska Board of Fisheries support and maintain the Alaska Department of Fish and Game's traditional and historic management of Kodiak's salmon fisheries, which align with Alaska's Constitutional mandates of management within the sustained yield principle for the common use of all people.

BE IT FURTHER RESOLVED THAT, we hereby request the Alaska Board of Fisheries to keep the January 2020 Alaska Board of Fisheries meeting in Kodiak to provide residents of all of Kodiak's remote Alutiiq communities reasonable opportunity to testify before the Board of Fisheries.

This resolution has been adopted by the Kodiak Archipelago Rural Regional Forum on September 26, 2019 by leaders representing the following Communities and Tribes:

Native Village of Akhiok, Kaguyak Tribal Council, City of Akhiok; Larsen Bay Tribal Council, City of Larsen Bay; Alutiiq Tribe of Old Harbor; Native Village of Ouzinkie, City of Ouzinkie; Native Village of Port Lions, City of Port Lions; Sun'aq Tribe of Kodiak; Native Village of Afognak and the Tangirnaq Native Village.

RE: Other work session business

Greetings, August 19, 2019 To: Doug Vincent-Lang, Commissioner Glenn Haight, Executive Director Regarding: Cook Inlet East Side set net regulations Over the last two weeks I have talked to both of you regarding a proposed change to the Cook Inlet East Side set net fishery regulations. Mr. Vincent-Lang mentioned that I should put forth a proposal to the board and upon talking to Mr. Haight, I found that we were too late to submit a proposal but that we could ask that the board itself consider generating the proposal. Proposal: Over the years, the East Side of Cook Inlet has been sub divided into small management areas in an attempt to help managers target specific fish based on their species and native waters. This is not easy in a mixed stock fishery such as Cook Inlet. These areas currently include the Blanchard line, Kasilof half mile, Kasilof terminal, Kasilof 600', North K Beach 600' and recently, the East Forelands (during the month of July when in the King Salmon Management plan). We are proposing an addition to the above management "tools" and that is to exclude the East Forelands from any East Side sockeye shut down in July or August triggered by a king forecast of under 13,500 fish. Referencing 5AAC 21.359 (d) (3). Data shows that the East Forelands catches the smallest total number of kings of any of the East Side sub sections (244-42, called Salamatof North). 2019 catch results show only 55 kings of all sizes and origins caught in the Forelands section compared to the rest of the sub districts which were at anywhere from 314 – 702. We are asking that you consider this idea with the hope that you will discuss this at this fall's Board workshop and then pass it as a board generated proposal. Thank you for your consideration, Lance Alldrin Luke Alldrin Christopher Monfor Christine Monfor Merrill McGahan Mac McGahan Dillon Pogue Carlee Vincent Mark Vincent Amanda Waggoner Chad Waggoner Lance Alldrin Alldrin & Sons Alaska Salmon

Nancy Hillstrand

Pioneer Alaskan Fisheries Inc.

Box 674

Homer, Alaska 99603

RE: Comments on EF-F19-097 5 AAC 39.222. Straying

In the ADFG Special Publication No. 09-10 ADFG Internal Review PWS Hatcheries on page 14 staff very eloquently makes the statement that straying has negative implications on wild stock management. This statement from the department supports EF-F19-097

Please accept this excerpt as comments on EF-F19-097 showing the Escapement Goals to become unreliable in the presence of hatchery strays. This internal review has many truthful important insights into the problems of straying that would be important to read.

STRAYING AND WILD STOCK ISSUES (excerpt from 2009 Internal Review)

"Large-scale straying of the PWSAC enhanced chum salmon also has negative implications on wild stock management. The department manages for wild chum salmon escapement goals based on aerial survey counts of fish in streams. All fish counted in streams are assumed to be wild stock fish. The presence of a high proportion of stray hatchery fish in streams artificially inflates wild stock escapement estimates. Inflated wild stock escapement numbers may mislead management into believing that the escapement goals have been met. The department then opens districts to harvest wild stock fish assumed to be excess to escapement goals. However, the escapement goal may not have been met because of the large number of hatchery strays in the aerial survey escapement estimates. Additionally there are significant genetic concerns associated with hatchery strays interbreeding with wild stocks."¹

"One of the department's greatest concerns are the implications to the genetic integrity of wild populations and to fishery management. Local adaptations

¹ 2009 ADFG Internal Review of PWS



among wild pink salmon populations have been demonstrated. Hatchery salmon are believed to become genetically distinct from the originating native population(s), and concern arises from the belief that the fitness of locally-adapted wild populations is reduced upon genetic integration with domesticated hatchery salmon.

Utilizing the relation between hatchery chum salmon straying rates and total instream chum salmon abundance, we interpolated ~40,000–45,000 hatchery chum salmon strayed into wild stock streams throughout PWS in 2005. The calculation was made using streams with observed chum salmon from the 208 index streams in 2005 (n=80). This is ~25% of the (175,000 mid point) 2005 Sustainable Escapement Goal used for managing wild stock chum salmon in PWS, ~21% of PWSAC's annual chum salmon brood collection, and ~5% of the total PWSAC hatchery chum salmon contribution to the CPF harvest using a 5-year average (Appendices A8 and A9).²

Straying leads to unreliable Escapement Goals and genetic This poses a significant risk to wild fish. This is a grave conservation Issue where the board can help the department to straighten out before more harm is caused to wild stocks.

With Kind Regards

Nancy Hillstrand

10-8-2019

² Special Publication No. 09-10 ADFG Internal Review

Nancy Hillstrand
Pioneer Alaskan Fisheries Inc.
Box 674
Homer, Alaska 99603
907-235-9772
907-399-7777

4/10/19

bear@alaska.net

RE EF-F19-097 INTERREGIONAL STRAYING Commercial - Lower Cook Inlet Kodiak

5 AAC 40.005. General (a)

PROBLEM: ADFG has documented unacceptable high levels up to 88% inter-regional straying of PWS enhanced salmon stocks into wild salmon stocks of Lower Cook Inlet the Gulf of Alaska's "essential habitats in marine, estuarine, and freshwater ecosystems". Significant and sanctuary stocks are affected.

The Genetics Policy Statement

B. Inter-regional: Stocks will not be transported between major geographic areas: Southeast, Kodiak Island, Prince William Sound, Cook Inlet, Bristol Bay, AYK and Interior.

These "essential habitats include spawning and incubation areas, freshwater rearing areas, estuarine and nearshore rearing areas, offshore rearing areas, and migratory pathways;" 5 AAC 39.222 (c)(1)(A)(iv)

In addition to genetics and fitness concerns, colonization from straying also creates **"the effect of excess predation and competition"**, disrupting the food web of the established ecosystem processes in these essential habitats of legislatively designated Kachemak Bay, Critical Habitat Area; and State Park; NOAA Habitat Focus Area; and National Estuarine Reserve and the GOA Coast. 16.05.251(8)

Art VIII Sec 7; AS 38.04.070; AS 41.21.131; AS 41.21.990; AS 16.20.590; AS 16.21.500; AS 16.20.580; AS 16.05.020; AS 16.05.050; AS 16.05.255; AS 16.20.520; AS 16.20.530; 5AAC 95.610

These Strays are a feral biomass that does not cease eating when they swing in to these essential habitats of Cook Inlet and GOA. Daily consumption calculated at 3-7% of their biomass, displaces, and competes directly with indigenous wild salmon, standing stocks of rearing shellfish, sand lance, herring and other forage species, in nearshore enclosed waters of Cook Inlet.

This is an invasive, affecting the desirable high valued wild species and intercepted poundage of our wild fisheries in the Cook Inlet and Kodiak Region.

Control measures are needed 16.05.251(8)

SOLUTION:

1. The solution to the “effect of this excess predation and competition” is to “exercise control measures necessary to protect the resources of the state” AS 16.05.251(8)
2. Bring the laws into compliance for the purpose of the conservation and development of the fisheries resources AS 16.05.221 ranking wild fish as the priority
3. Designate areas for Lower Cook Inlet seiners to intercept these feral fish before they enter Kennedy Entrance into Cook Inlet, Kachemak Bay and the outside coast. AS 16.10.440.
4. Classify stray hatchery fish as "predators" 16.05.251 (6)
5. set apart sanctuaries in the waters of the state in LCI and the GOA wild river systems located within this call for proposals 16.05.251(1)
6. Requesting expansion of standardized otolith monitoring and enumeration programs in On the west side of Cook Inlet and outer coast of Gulf of Alaska these
7. Request the Kitoi Bay hatchery on Afognak Island to move on their otolith marking and monitoring program
8. Establish a moratorium on Permit Alteration Requests and remote Releases in LCI and Kodiak
9. Fine and cite hatchery operators for waste of salmon AS 16.05.831.
10. Request expansion of standardized otolith monitoring and enumeration programs in On the west side of Cook Inlet and outer coast of Gulf of Alaska these
11. Request the Kitoi Bay hatchery on Afognak Island to move on their otolith marking and monitoring program
12. Establish a moratorium on Permit Alteration Requests and remote Releases in LCI and Kodiak
13. Request a moratorium for which there is insufficient biological and resource management information necessary to promote the conservation and sustained yield management of the fishery, threatens the conservation and the sustained yield management of the fishery resource and the economic health and stability of commercial fishing; 16.43.225 (3)

Nancy Hillstrand

Pioneer Alaskan Fisheries Inc.

Box 674

Homer, Alaska 99603

RE: Comments on EF-F19-095 5 AAC 39.223. Policy for statewide salmon escapement goals

In the ADFG Special Publication No. 09-10 ADFG Internal Review PWS Hatcheries on page 14 staff very eloquently makes the statement that straying has negative implications on wild stock management. This statement from the department supports EF-F19-095

Please accept this excerpt as comments on EF-F19-095 showing the Escapement Goals to become unreliable in the presence of hatchery strays. This internal review has many truthful important insights into the problems of straying that would be important to read.

STRAYING AND WILD STOCK ISSUES (excerpt from 2009 Internal Review)

"Large-scale straying of the PWSAC enhanced chum salmon also has negative implications on wild stock management. The department manages for wild chum salmon escapement goals based on aerial survey counts of fish in streams. All fish counted in streams are assumed to be wild stock fish. The presence of a high proportion of stray hatchery fish in streams artificially inflates wild stock escapement estimates. Inflated wild stock escapement numbers may mislead management into believing that the escapement goals have been met. The department then opens districts to harvest wild stock fish assumed to be excess to escapement goals. However, the escapement goal may not have been met because of the large number of hatchery strays in the aerial survey escapement estimates. Additionally there are significant genetic concerns associated with hatchery strays interbreeding with wild stocks."¹

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populations have been demonstrated. Hatchery salmon are believed to become genetically distinct from the originating native population(s), and concern arises from the belief that the fitness of locally-adapted wild populations is reduced upon genetic integration with domesticated hatchery salmon.

Utilizing the relation between hatchery chum salmon straying rates and total instream chum salmon abundance, we interpolated ~40,000–45,000 hatchery chum salmon strayed into wild stock streams throughout PWS in 2005. The calculation was made using streams with observed chum salmon from the 208 index streams in 2005 (n=80). This is ~25% of the (175,000 mid point) 2005 Sustainable Escapement Goal used for managing wild stock chum salmon in PWS, ~21% of PWSAC's annual chum salmon brood collection, and ~5% of the total PWSAC hatchery chum salmon contribution to the CPF harvest using a 5-year average (Appendices A8 and A9).²

Straying leads to unreliable Escapement Goals. This poses a significant risk to wild fish. This is a grave conservation Issue where the board can help the department to straighten out before more harm is caused to wild stocks.

With Kind Regards

Nancy Hillstrand

10-8-2019

² Special Publication No. 09-10 ADFG Internal Review

Nancy Hillstrand

Pioneer Alaskan Fisheries Inc

Box 674

Homer, Alaska 99603

RE: COMMENTS Non regulatory proposal b. EF-F19-095

Greetings to Board of Fisheries

EF - F19-095 was originally submitted as 5 AAC 39.223. Policy for statewide salmon escapement goals because of continual straying into lower Cook Inlet

Please accept my proposal as originally sent by email as an attachment to the Board support. After sending this in, I was told to fill in the online proposal form instead and in the process my proposal got turned around and became confusing.

I am in sincere hopes that you will deliberate this important topic of reliability of escapement goals when wild streams contain hatchery strays

5 AAC 39.223. Policy for statewide salmon escapement goals.

PROBLEM

The high levels of hatchery straying in LCI from PWS masks the reliability to enumerate and estimate the very crown of ADFG sustainable management, the escapement goals. Also until Kodiak gets a reliable otolith marking program we will have no idea how many "no marks" otoliths are actually Kitoi Bay Strays. Straying obscures the mandated "management consistent with sustained yield of wild fish stocks" AS 16.05.730.

ADFG and the BOF are charged with the "duty to conserve Alaska's salmon fisheries on the sustained yield principle" "for which the department can reliably enumerate (BEG) or estimate (SEG) salmon escapement levels as well as total annual returns;" "for aggregates of individual spawning populations with similar productivity and vulnerability to fisheries and for salmon stocks managed as units";

Unreliability of escapement goals and allowing magnitude predation from excess straying in these ecosystems must not be tolerated.

SOLUTION:

1. Regain our Wild Fish Priority
2. Bring the laws into compliance for the purpose of the conservation and development of the fisheries resources AS 16.05.221
3. Notify the public, the MSC and the RFM that because of hatchery strays escapement goals are no longer reliable.
4. Crack down on Regional Planning Teams and aquaculture corporations to mark all their fish, AS 16.05.251(5) cease increases, and cease remote releases to re-claim reliable escapement goals.
5. Defective justification, delays and inaction to control straying must cease by the department to allow this damage to continue.
6. (7) prepare a scientific analysis with supporting data whenever a new BEG, SEG, or SET, or a modification to an existing BEG, SEG, or SET is proposed and, in its discretion, to conduct independent peer reviews of its BEG, SEG, and SET analyses;
7. AS 16.10.440. Harvest these feral fish
8. designate specific areas for harvest by Cook Inlet seiners to target and intercept these feral fish when detected and before they enter Kennedy Entrance.
9. Costly monitoring must be paid for by aquaculture Associations.

Authority: [AS 16.05.251](#); 5AAC 39.220; 5 AAC 39.222; 5 AAC 39.223; AS 16.05.831; 16.20.610; 5AAC 95.610

PROPOSED BY: Nancy Hillstrand now (EF-F19-095)



OLD HARBOR
NATIVE CORPORATION



PC113
1 of 3

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September 30, 2019

Board Support Section
P.O. Box 115526
Juneau, AK 99811

RE: Maintain Kodiak's Historical Salmon Fishery

Dear Chairman Morisky and Board Members:

Attached is a resolution from the Old Harbor Native Corporation requesting that you maintain Kodiak's historical commercial salmon fishery. Old Harbor is aware that there are about ten proposals to substantially change the way Kodiak's commercial salmon fishery is managed. Whether it's Chignik fishermen from the west or Cook Inlet fishermen from the North, it seems like both districts are trying to address local problems by looking outside their region. Kodiak is not responsible for the collapse of the Chignik early sockeye run and restriction on Kodiak will not address the management and allocative issues in upper Cook Inlet nor will it increase production in the Susima drainage.

Fishermen resident in Old Harbor fish throughout the Kodiak area. Any regulatory changes that reduces Kodiak's commercial salmon fishing opportunities will have a direct impact on Old Harbor fishermen. We have been working hard to keep fishing as an economic base in our community. We have worked especially hard to encourage some younger Old Harbor fishermen to get started with their own vessels. These new fishermen will be harmed disproportionately if the Cape Igvak or the Halibut Bay fisheries are reduced. Such closures will move the Kodiak fleet that fishes Igvak or the west side into areas that our less experienced fishermen currently work and are likely to substantially reduce their catches. These types of regulations go directly against much of what the Old Harbor Native Corporation has been working on for the past 20 years.

Old Harbor fishermen identify with the community economic concerns voiced by Chignik, Chignik Lake and Chignik Lagoon as we face many of the same issues. Fishermen from those communities have had a hard time making enough money from their Chignik salmon fishery to continue living in their community --- this is the same challenge for Old Harbor fishermen! However, the Cape Igvak management plan is working. During each year when the early Chignik run has been weak, the Igvak fishery has been closed. Old Harbor believes the Board should not confuse legitimate concerns about maintaining Chignik communities with impacts from the Cape Igvak fishery. They are not related.

Thank you for your consideration of Old Harbor's concerns about making allocative changes to the Kodiak commercial salmon fishery.

Very truly yours,

OLD HARBOR NATIVE CORPORATION

Carl H. Marrs
Chief Executive Officer



RESOLUTION NO. 06-2019

A RESOLUTION OF THE OLD HARBOR NATIVE CORPORATION IN SUPPORT OF THE ALASKA DEPARTMENT OF FISH AND GAME'S TRADITIONAL AND HISTORIC MANAGEMENT OF THE KODIAK SALMON FISHERY, AND MAINTAINING THE LOCATION OF THE JANUARY 2020 BOARD OF FISHERIES MEETING IN KODIAK

WHEREAS, the Old Harbor Native Corporation Board of Directors ("Board") met at a regular Board meeting on September 20, 2019 in Old Harbor, Alaska;

WHEREAS, the Alutiiq people were the original stewards of the land and water resources in the Kodiak Archipelago and have been the users of salmon available in the Kodiak area for more than seven thousand years; and,

WHEREAS, Ozunkie, Port Lions, Larsen Bay, Karluk, Akhiok, Old Harbor and the Alutiiq people living in Kodiak and throughout the Kodiak Island Borough are economically and culturally dependent on the Kodiak commercial salmon fishery; and,

WHEREAS, Kodiak's six Alutiiq rural communities as well as the City of Kodiak and Kodiak Island Borough are economically struggling due, in part, to dramatically reduced groundfish quotas and substantially lower exvessel prices, including reduced salmon prices; and,

WHEREAS, Kodiak's commercial salmon fishery is an historical fishery that developed from the earliest days of commercial salmon fishing in Alaska and has remained essentially the same fishery since the implementation of limited entry in 1973; and,

WHEREAS, the State of Alaska, acting through its agents on the Board of Fisheries and in the Alaska Department of Fish and Game, is constitutionally responsible for the sustainability of salmon fisheries for the common use of all people, and to manage these fisheries with the sustained yield principle without creating any exclusive right or special privilege and based on the historical scope and practices of the fishery; and,

WHEREAS, it is critical for residents of Kodiak's Alutiiq rural communities and the City of Kodiak to continue to have harvest opportunities throughout the Kodiak Management Area and to engage in Kodiak's historical commercial salmon harvest; and,

WHEREAS, testimony before the Alaska Board of Fisheries is important for both the Alaska board of Fisheries as well as for the residents of Kodiak's Alutiiq communities because Alutiiq community residents are frequently among those most heavily impacted by fisheries decisions, and yet rarely are provided the opportunity to speak with and be heard by those constitutionally mandated to represent them and to consider their livelihoods when making allocative decisions.



NOW, THEREFORE, BE IT RESOLVED BY OLD HARBOR NATIVE CORPORATION THAT:

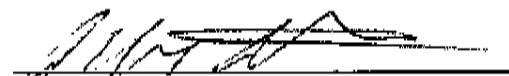
Section 1: Old Harbor Native Corporation hereby requests the Alaska Board of Fisheries to support and maintain the Alaska Department of Fish and Game's traditional and historic management of Kodiak's salmon fisheries, which align with Alaska's Constitutional mandates of management within the sustained yield principle for the common use of all people.

Section 2: Old Harbor Native Corporation hereby requests the Alaska Board of Fisheries to keep the January 2020 Alaska Board of Fisheries meeting in Kodiak to provide residents Kodiak's remote Alutiiq communities reasonable opportunity to testify before the Board of Fisheries

Section 3: This resolution shall take effect immediately upon adoption.

Certified as adopted by the Board of Directors of Old Harbor Native Corporation at its regularly scheduled meeting on September 20, 2019.

Date: 9.23.19


Jeffrey Peterson, Chairman

Date: 9.23.19


Freddie Christiansen, Secretary

REPRESENTATIVE LOUISE STUTES

Alaska State Legislature / District 32



SESSION ADDRESS:
Alaska State Capitol
Juneau, AK 99801
Phone: 907-465-2487
Fax: 907-465-4956
Toll Free: 1-800-865-2487



INTERIM ADDRESS:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: 907-486-8872
Fax: 907-486-5264

Date: October 7th, 2019

To: Alaska Board of Fisheries

Re: Opposition to Moving the Kodiak Finfish Meeting to Anchorage

Dear Chair Morisky and Members of the Board,

I am writing to express my strong concern that the Alaska Board of Fisheries may consider moving the location of January's Kodiak finfish meeting to Anchorage. A number of folks from Kodiak have contacted my office with this concern and it is on their behalf, as well as the behalf of a transparent, accessible, and effective Board process that I contact you today.

In recent years, there have been widespread concerns regarding adequate public notice and stakeholder input during certain phases of the Board process. These concerns have certainly been expressed recently regarding the Board's decisional process in relation to where meetings are held.

The guiding principles behind the Board's local advisory committee structure and the public testimony process are to provide fishery stakeholders maximum access to the Board and give Board Members the opportunity to hear concerns from stakeholders. Moreover, local input and maximum access to the resource are implicit to "common use" provisions in the Alaska Constitution. Moving meetings out of the area being impacted is contrary to these principles and undermines the Board's ability to make sound decisions.



I've heard "cost savings" mentioned as a rationale for moving meetings to urban locations. I ask that you consider the question of, "Who would the cost savings be to?" The Board's very purpose is to allocate Alaska's fisheries resources between competing stakeholders while preserving those resources for future generations; to accomplish that, you need local input every step of the way but particularly in full Board meetings where final decisions are made. Moving rural meetings to urban areas actively discourages local input by shifting the cost burden to the stakeholders and creating an economic barrier to participation in Board meetings.

Whether the location is Kodiak, Cordova, Kenai, or Dillingham, the Board should meet where the impacted fishery occurs. The Kodiak finfish meeting has been publicly noticed for three years to occur in Kodiak, where the impacted fishery is, and that is where the meeting should remain.

I know each of you desires the best outcomes for Alaska's fisheries resources and the fairest allocation to its stakeholders. Those goals are accomplished through maximum stakeholder access at meetings so that Board Members have all of the relevant representation and information on hand with which to make these critical decisions. It is through that lens that I ask you to view any attempt to move a meeting location out of the area that the meeting pertains to.

Thank you for your consideration and work on behalf of Alaskans. Please feel free to contact me with any questions.

Sincerely,

Representative Louise Stutes
Chair, Special Committee on Fisheries
State House Representative for District 32
Proudly Serving Kodiak, Cordova, Yakutat, and Seldovia



Cc: Alaska Board of Fisheries, Boards Support Section



From: [Roni Carmon](#)
To: Bof
Subject: Monday, September 30, 2019 2:08:11 PM
Date:

Talked to Doug Lang,
Commission of fish!

He told me the dipnet fishery was implemented, and thought of
Way before the oil spill.

If it was; then it was set up to harvest fish ,through the state.

And the state was selling Commerical fishing permits,
Knowing some day , they would be taking the harvest away from Commerical fishermen.
In cookinlet.

In 1989 ,the oil spill,the dipnet fishery was implemented.
30 years now,

And the Commerical fisherman ,their industry ruined.
Last year ,the dipnet fisherman took 7million fish,
The sport fisherman took 6million just on the Kenai river.

Adfg allocations ,to Commerical fisherman was ,1.3 million fish.
So 14 million fish, we are talking about the Kenai river.

The dipnet fisherman got 21 days on the Kenai river ,and 41days on the kasiolf,

We got half those day.
The commission came down took two days away from us.

Said he wasn't going to follow the plan.
That gave the dipnet fishery,non stop 9 days straight of the peak.

We got zero days of the peak ,the week of the 23 of July.

The oil companies,paying fish and game wages.
The brutal government must stop this,or buy are permits back.
You realize how many sucisides
And how must financial losses you caused.
How many divorces,broken homes,you caused.

And zero income to the state ,or bourgh.
Last year 542 million dollars retail
Left the state,two sucisides

Let's stop this massive give away.
It's not nessesary ,limit fishing tried to go to 18, and even 24 fish .
With a fishing pole.

How stupid was that

Dan Sullivan,talked about disaster relief ,last nite for Alaskan fisherman.



I wrote him a letter,talking about ,the trading of one Industry for another :
About Alaska fish and game,and the board of fish being involved.

With the big box ,sporting good stores,using the Kenai Peninsula as a tourist destination,and
taking our fish ,and giving it to them.

I told him ,it was in tune to around 44billion dollars.
Of fish just on the Kenai Peninsula bourgh.

And the blob was not the cause of a lack of fish.
Scale samples from fish and indicates,the fry never left the river in 2012 2013,
The reason was ,the fish never spawned.
They was taken by the dipnet fishery.
And the sport fishery,so many fish was taken ,they never had a chance to spawn.

He talked :you can not destroy one fishery ,to make a different fishery better.

The board of fish ,the adfg,and special interest, has done this.

Cookinlet fisherman contributed 70 million a year to the general fund,back in the day.

Now almost nothing !
But for disaster relief,
We need to be included,and we are not .

Bof you are responsible,for giving away,44billion dollars of the cookinlet salmon ,bottom fish.
To the tourism industry.

I'm asking you to end the dipnet fishery,charge the guides a Commerical fisherman
license,needs to be 1760 dollars a season.
And they get 170 days fishing on the water,
300 days on the ocean,
We cookinlet fisherman need 90 days in the cookinlet.

They re 6.4 million guides of all types in Alaska,using our resources,taking state and federal
animals and fish !

They take from Seattle to the Bering sea,anything and every thing!
Almost non stop,and license ,and regulation free.
Zero income to the state.

Dan Sullivan,and Lissa murkowski,both indorse the practice,for votes.

Mr Sullivan being pressured,
Member of congress are informed.

Let change this before you completely ruin ,the Commerical fishery,and ruin the salmon ,and
bottom fish .

Ron carmon



From: [Roni Carmon](#)
To: Fish meeting
Subject: Thursday, September 26, 2019 3:23:18 PM
Date:

I urge you to do the fish meeting in Kenai Alaska.
I was told by a republican rep.
Back when the oil spill settle came due ,and was given .

That Exxon was not pleased.
And they exercised,the idea!
That ,the dipnet fishery would be a get even ,with the Commerical fishery!

It been 30 years now,
And Exxon had it way with us.

I m pretty sure ,7million fish a year gets ,dipnet on the Kenai Peninsula.

At 15 dollars a lb ,
That comes to 542 million dollars retail ,that leave the peninsula retail.
And the sport fishery,takes 6million fish off the Kenai Peninsula, every year.

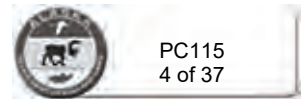
It time the board of fish ,stops catering to , coastal conservation ass, and doing Exxon ,a 30 year favor.

That's why the board of fish does not want to be here on the peninsula.

The old fisherman ,are really old now.
You have taught the lesson ,we deserve.

End the dipnet fishery,and let's put our fishery back together again.

From: [Roni Carmon](#)
To: Dipnet license,
Subject: Thursday, September 12, 2019 3:22:34 PM
Date:



Bof:I went to court today:
Fish and game officer verses dipnet Fisher man.

Officer caught ,man taking fish with out harvest ticket,
She observed him 3day s in a row.
On the 3 day ,approached the man ,no harvest ticket, when he found his harvest ticket, no
recorded fish those two days.
Third day was not over yet.

Also ,a friend living out of state.
Aided in killing the fish with a rock ,said the state trooper.

So the judge ,asked how many fish he took, un married 19 year old took 25 fish,he stated.

So judge said fishing without,a harvest ticket required.
Don't let the other kid, kill your fish.
How do you plea ,he said guilty

The judge fined him ,100 dollars.
And he got to keep his fish.

He did not record his fish ,he said 25, but he probably took 25 ever day,
He did not clip tails,
His friend has no license and was from out of state.
And only when he got caught ,did he compli with any laws.

I'm telling you,7 million fish are being taken from the 2rivers on the Kenai peninsula.
At 15 dollars a lb around this years fish ,78 dollars a fish .
Or 542 million total dollars .
And that got to stop.

I recommend you pay the Commerical fisherman from the cookinlet 44billion dollars ,for the
taking of the Commerical fishermen harvest.
For the last 30 years.

You must count fish ,those 25 fish would have never been recorded ,if not caught.

By the way,I have a license to fish ,so the judge thru the maximum penalty against me.

Remember no license required to dip net,troopers can't site them ,it's a self regulated
fishery,no license required .
My fine for not having a picture in my license.
395 dollars.

The dipnet fisherman must buy a dipnet license.

Then the troopers can site dip net fishermen.

None add proxy cards ,no license ,boats take ,some days 1000 a day .
Please here my plea ,I want the dipnet fishery to go away.



From: [Roni Carmon](#)
To:
Subject: Fwd: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending
Date: Wednesday, September 4, 2019 3:32:21 PM

This story :really isn't true:
It got lots of faults.

Let's not fool our selves,
If we had not destroyed our cookinlet Commerical fishery.

We could of added,70 million more to the general fund.
Commerical fishing,and oil ' is the only businesses that contribute to the general fund.

And it not giving hardly anything to the state or bourgh,so those number are incorrect.

Only thing I prove,the dingle fund?
If it's paying money to the general fund ,it's hidden . Please explain that to me?

Begin forwarded message:

From: Dallasak789
Date: Sep 1, 2019 at 8:53 PM
To: RONI CARMON
Subject: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

<https://www.alaskajournal.com/2019-04-03/adfg-leaders-tout-11-billion-return-agency-spending>



From: [Roni Carmon](#)
To: Fwd: So much fish!
Subject: Wednesday, September 4, 2019 10:41:27 AM
Date:

Please review: 'this video ,you have too click the blue writing at the bottom,2boats,two full loads ,20 clients.

I believe if you add it all up 20 to 30 thousand pounds of fish.

But this goes on for 300 days a year.'

Zero income to the state to balance the budget.

Begin forwarded message:

From: Shellene L (DFG) Hutter <shellene.hutter@alaska.gov>
Date: Mar 19, 2019 at 11:18 AM
To: RONI CARMON
Subject: RE: So much fish!

Dear Mr. Carmon,

Thank you for your response to the Notice of Proposed Changes in the Sport Fishing Guide and Charter Logbook in the Freshwater Guide Program Regulations of the Alaska Department of Fish & Game.

Your feedback is important to us. The Alaska Department of Fish and Game strives to protect, maintain, and improve the fish, game, and aquatic plant resources of the state, and manage their use and development in the best interest of the economy and the well-being of the people of the state, consistent with the sustained yield principle. Please note that your comments will be summarized and reported to Department of Law which they may use in their evaluation of these proposed changes. Additionally, a response to commonly asked questions related to this proposed regulatory change is now available on the Alaska Online Public Notice System located here:

<https://aws.state.ak.us/OnlinePublicNotices/Notices/View.aspx?id=193329>

In response to your comment, this action was part of the FY19 and FY20 budget reduction process and since the program is no longer funded by a license fee, is not self-supporting. Until legislation is adopted that implements a freshwater guide/business license fee, there will likely be no freshwater logbook program. The saltwater logbook program will remain in place for the time being, due to the need of that data for SEAK king salmon treaty obligations and halibut management.

Sincerely,

Shellene Hutter
Regulations Coordinator



ADF&G
907-465-6124
shellene.hutter@alaska.gov

From: Roni Carmon
Sent: Friday, March 08, 2019 5:57 AM
To: Hutter, Shellene L (DFG)
Subject: Fwd: So much fish!

Please tap on the blue to view video
The show this to the board of fish.
I believe way to many fish being taken .way to many days of unregulated sport fishing.

Boats so fast,efficient gear,and
Targeting the same fishing holes

Are killing our resource.
In all my forty years of commercial fishing,I've never got to fish 200 even 300 days straight
for halibuts.

Or salmon or crab ,
May be 30 days max.
Of all three spieces.

I believe 6.5 million guides,have access ,to these fish.
Please count the fish there ,and snapper,black cod ,lingcod,halibuts.
I guessing,30,000 lbs of fish.
In two boats,and 20 clients .

Let's get real folks.
We Alaskan,people are just ,stupid,about what we do .

Begin forwarded message:

From: Roni Carmon
Date: Nov 10, 2018 at 2:58 PM
To: Roni Carmon
Subject: Fwd: So much fish!

Begin forwarded message:

From: Dallasak789
Date: Oct 23, 2018 at 9:58 AM
To: Mpatwalsh
Subject: Fwd: So much fish!



So many fish,And they do it every day.

Begin forwarded message:

From: Roni Carmon
Date: Sep 2, 2018 at 7:48 PM
To: Roni Carmon
Subject: So much fish!

https://m.facebook.com/story.php?story_fbid=10216254768421590&id=1224383378

From: [Roni Carmon](#)
To: Bof
Subject: Tuesday, September 3, 2019 10:05:16 PM
Date:

I was hoping ,you would do away with the upper cookinlet dipnet fishery!
2019 , dipnet fishery took 542 million dollars worth of salmon from the Kenai river.
Zero income to balance the budget,zero income to the general fund.

From: [Roni Carmon](#)
To: Hummm ,I filed?
Subject: Sunday, September 1, 2019 8:42:28 PM
Date:

I asked the board of fish to stop the dipnet fishery, because,542 million dollars could of aided
in helping the general fund pay the bills to Alaska.

I do not see this ,on the list!
542 million now for the last 30 years
Please make it available to the board of fish.



From: [Roni Carmon](#)
To:
Subject: Fwd: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending
Date: Saturday, August 17, 2019 1:43:21 PM

Read this :it's all a lie.

Tap the blue,letter from the commissioner of fish.

Giving 7 million fish ,to the dipnet fishery,can't create a income.

Sport fishing ,that money came from the sporting good stores.

And nothing to the state.

Same as hunting,came from selling products in the store.

Zero income to the state.

No money at all ,the state gave away all it fish and game ,zero income for the state.

Begin forwarded message:

From: Dallasak789
Date: May 26, 2019 at 8:36 PM
To: Sen Micciche <sen.peter.micciche@akleg.gov>
Subject: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

Peter this is a pretty much a bull crap ,survey.

I'm been talking to the governor,trying to get him to curtail ,the dipnet net fishery,and the guides fishing on the Kenai peninsula bourgh rivers and ocean till they get a license to legally fish.

Yes the state been waiving there license now for the last 22 years.

Last year charter boats on the Kenai took

179000 halibut,90 000 cod,35000 kings ,222000 sockeye s,40 000 coho,and the number of pink unrecorded.

From now on ,no more log books.

No more licenses ever.

Adfg blames state senators.

And house.rep.

Or for the last 30 years,

44 billion dollars of fish resources from Alaskan waters.

Somebody got to pay ,for that missing resource.

I hate to see ,half the permanent fund ,in missing resources ,

I urge you to get that money back from bob penny,coastal conservation ass.



The 20 thousand business ,that need fish to sell their toys.

Half the permanent fund!!!!

<https://www.alaskajournal.com/2019-04-03/adfg-leaders-tout-11-billion-return-agency-spending>

<http://www.alaskajournal.com/2019-04-03/adfg-leaders-tout-11-billion-return-agency-spending>

From: [Roni Carmon](#)
To: Change request
Subject: Wednesday, August 14, 2019 10:04:43 PM
Date:

There a over over abundance of people all over Alaska .
That would like to see the board of fish step down .
Get out of this program intirely!

They have been harm ful for many years now.

The Commerical fishery a business.
Every business that is run by a another organization.
Can't survive.
They have to balance there books.
Please discontinue the board of fish and game.

Before they ruin every fish and animal life in Alaska.

From: [Roni Carmon](#)
To: Regulation change
Subject: Friday, August 9, 2019 2:05:40 PM
Date:

Board of fish :warm weather,river temp changing:
Recommen no more catch and release in any of Alaska anymore.

From: [Roni Carmon](#)
To: Regulation errors
Subject: Friday, August 9, 2019 1:56:16 PM
Date:

The error of maximum substantiable yield for all user groups.
Has to be changed to maximum sustain yield ,for the benefit of a healthy fish population.
And greater growth,and a premium gene pool,.

Not maximum substantiable yield for all user groups.

Roni Carmon
9079530238



From: [Roni Carmon](#)
To: Dipnet fishery
Subject: Friday, August 9, 2019 12:53:12 PM
Date:

Conservation: zero conservation.
Proposal change: do as quickly as possible.

This year, 2019 dipnet fishery on the Kenai peninsula took 7 million fish.
The retail price 78.00 dollars a fish.
Or 546 million dollars from the state of Alaska budget (general fund).

End result, that money, did nothing for the economy, it is gone!
30 years now zero revenue to anyone.

You see our state is broke.
And the fish is exploited, for greed, want and waste.

The fish, are taken at the mouth, of both rivers.
At the expense of the Commercial fishery, that does pay into the general fund.

Dip net fishery, hurts everyone.
Does not help anyone, but feeds
Gasoline, and some sales tax.

It is a form of welfare, and your fishery promotes more welfare.
And it is ruining the fish habitat.

Biggest reason to rid this practice is ?
It is a resource, being of no value, and it could be 546 million. Dollars of protein to the world, at
a profit, rather than a giveaway.



From: [Roni Carmon](#)
To: Board of fish
Subject: Wednesday, August 17, 2016 1:23:44 PM
Date:

Pros pal sent in March
Of 2015
And 2016
Next board meeting 2018
We would like the board of fish to go away
Every 4years
To long .

Sent from my iPhone

From: [Roni Carmon](#)
To: Fwd: Dipnet fishery
Subject: Saturday, August 17, 2019 1:22:32 PM
Date:

Please read :to the bof

Begin forwarded message:

From: Dallasak789
Date: Aug 14, 2019 at 10:18 PM
To: Shellene Hutter <shellene.hutter@alaska.gov>
Subject: Dipnet fishery

I was wrong ,7 million fish on the Kenai peninsula,dip netfishery.

At 78 dollars a fish.
That a retail price of 546 000,000 dollars.

The Commerical canary took ,whole sale net price to them 84 million dollar.

And that's what the fisherman got from them.,split a 1000 ways.

After eggtake ,and meat the canary
Netted 378000,000 .

The sport fishery guides.does not count fish any more. Charter boats don't count fish anymore.

But minimum ,6 million fish :
Without a license,charter boats ,without a license.

Zero income to the state,as revenue.
I ask the board of fish change request ! To dissolve as a organization,that regulated fish .



From: [Roni Carmon](#)
To: Fwd: Bof
Subject: Thursday, August 15, 2019 10:06:01 PM
Date:

Board of fish must read, and react!
To stop fishing these fish for pleasure.
And want and waste.
These fish are grossly exploited for pleasure, and torture.

From: [Roni Carmon](#)
To: Fwd: Bof
Subject: Thursday, August 15, 2019 10:08:25 PM
Date:

Just pray, that the board of fish .
Goes away:
It not the way to manage a fishery.
Or a fishing business.
It criminal, to beat a industry, into mush.

From: [Roni Carmon](#)
To: Fwd: Bof
Subject: Wednesday, September 4, 2019 10:56:06 AM
Date:

I see none of my comments, was received by the board of fish.
None is on the proposal recommended, that will be approach in oct.
I urge you to save Alaska, and the fish.
You guys are volunteers, and you need to act for Alaskan, and not the politics.
I asking you to stop catch and release, and stop the dipnet fishery.
The dipnet fishery, taking 542 million dollars out of the possible tax base .from the Kenai peninsula.

Begin forwarded message:

From: Glenn E (DFG) Haight <glenn.haight@alaska.gov>
Date: Feb 27, 2019 at 6:29 AM
To: RONI CARMON
Subject: RE: Bof

Thanks Roni. I'll forward this to board members.

Glenn



From: [Roni Carmon](#)
To: Fwd: Bof
Subject: Wednesday, September 4, 2019 11:01:33 AM
Date:

I see this letter never got to the board of fish :
The proposal tell the story,it not on anything to be discussed,in oct .
Please I urge you to do away with the dipnet fishery,
Sport fishing ,stop catch and release.
The dipnet fishery,takes away ,taxes on 542 million dollars of fish.
Please move all salmon fishing to salt water,
Let's make ,Alaska Kenai Peninsula Borough, second resource available to a tax base.

Begin forwarded message:

From: Glenn E (DFG) Haight <glenn.haight@alaska.gov>
Date: Feb 22, 2019 at 4:37 PM
To: RONI CARMON
Subject: RE: Bof

Hi Roni,

Anything in particular you would like me to do with this email? Public comment for any particular meeting?

Thanks,
Glenn

From: Roni Carmon <dallasak789@hotmail.com>
Sent: Friday, February 22, 2019 3:30 PM
To: Haight, Glenn E (DFG) <glenn.haight@alaska.gov>
Subject: Bof

Do you dare bring up sockeye salmon as plankton eaters ,, and they are the most targeted fish. In alaska.

Fished in every spawning ground alaska wide.

These plankton eaters are ,used as a sport fish, fish 175 days a summer, on top of the legal catch ,then catch and released, beings 24 hours a day.

Some catch and release 300 fish a day,then release them.

With all the-intercept fisherys

With all the gross respect tthee fish get.

The pollack fish is a plankton eater,the crab-are are part of the cycle of what plankton eater do.



We take a lot of plankton eaters
And use them. Their job in nature's world, is to set the pH of the ocean.

My point is, the sockeye salmon are killed in rivers,
The personal use, kills the fish, in river. That's about 7 million in the Cook Inlet Borough.

These fish need to be managed, as they can't feed the world.

You must manage them carefully.

My 47 years here, managed the sockeye for maximum sustainable yield for all user groups.

Simply put the sockeye more than a fish,
You must save it.

And in river fishing killing it.



From: [Roni Carmon](#)
To:
Subject: Fwd: Glen will you send this letter to the board of fish please,before they get to kenai,
Date: Wednesday, September 4, 2019 10:51:15 AM

Please read this in October:
And act!
I see by the proposal process you never receive this letter

Begin forwarded message:

From: Glenn E (DFG) Haight <glenn.haight@alaska.gov>
Date: Mar 4, 2019 at 8:13 AM
To: RONI CARMON
Subject: RE: Glen will you send this letter to the board of fish please,before they get to kenai,

Hi Roni,

I'll send the four emails you sent me on Friday and over the weekend to the board members.

Thanks,
Glenn

From: Roni Carmon <dallasak789@hotmail.com>
Sent: Sunday, March 3, 2019 1:17 PM
To: Haight, Glenn E (DFG) <glenn.haight@alaska.gov>
Subject: Glen will you send this letter to the board of fish please,before they get to kenai,

the sockeye salmon

The cold cold waters from the south pole circulates through all the ocean on are planet .the cold cold water go down as far as 7000 ft.

these currents pick up vital nutrients on their journey.
as the circulation goes on, phytoplankton is circulated and captured in this long journey.

In the waters and all over our planet , phyoplankton aid the rain forest , feed tropical fish helps the coral grow .
hundred of thing happen because of phytplankton!

But for Alaska , off the island of kodiak ,the plankton come to the surface in our pacific ocean , mixes or makes zooplankton these tiny crustaceans , are food for the plankton eaters.



Pollack are plankton eaters,
sockeye salmon are plankton eaters.
Some whales are plankton eaters
and crab ,and bottom feeders, are a cycle of what the plankton eaters do.

As these fish poop , their waste goes to the bottom of the oceans ,
and all the bottom feeders ,crab eat the poop , and when they do this , oxygen is released .
That oxygen then bubbles to the top of the ocean floor, the fin fish stir that water with the
oxygen and the ph of the ocean then becomes, the correct ph to sustain life.

So the salmon , the sockeye salmon , is more than just a sport fish, more than just a source of
food.

I'm sure some of this is not a 100 percent correct, as this came from the nova channel'
but with a little bit of common sense , it can't be too far off.

So with 45 million salmon being harvested in Bristol bay.
And 900 ton being taken on one boat , the Clinton drag boats for Mac Donald for the fish
stick industry.i believe theirs 21 boat in there fleet.
Along with all the other sockeyes taken , the plankton eaters are in jeopardy!

I still think the oceans harvest , and habitat still safe now .

But my worries tho!!
are !

When you take fish from the spawning grounds , you under mind everything .
And we are see these results now !
low fish returns i believe , is because Sport fishing guides , are way to many , and way to many
days, on the rivers fishing .

We open up all of Alaska to to the whole world to come fish are salmon . the whole world !
Alaska a tuff place to survive , and you have too be careful, not to destroy the eco. system.

The sport guide target the hold up areas , the resting places in the rivers.
they target the spawning grounds ,
They target the lakes ,

These rivers and streams , need to be treated as , like a woman womb , you can't drag hook
anchor and boat props thru these spawning grounds and hold up area any more !

Like i said Alaska open to the whole world to fish, millions of clients , bring thousands of



guides.

for a free for all , to fish the rivers ,lakes, and red sockeye salmon unman aged , unregulated for the most part ! be cause Alaska so big.

So i ask ,the board to make the sport fisher guides , to fish the ocean , no more river fishing for sockeye salmon.

They have ways to catch fish, they are very successful , it wont hurt there bottom line one bit.

The sockeye salmon need a safe refuge , they need a calm place to lay there eggs , and rest. Simply put a responsible way to manage fish is now . and we must do it now . these salmon , are treated with so much disrespect.

Another thing that's happening , is personal use , and subsistence fishing . 7 million fish are ,dipneted on the Kenai peninsula Borough . Once a !00 million fishery . Now a 35 million dollars , give away retail ,to the people .Zero income to the state , or the Borough tax free to the people. Enough to balance the state budget.., when these fish are taken in river, this changes everything.

when you take these fish at the river it changes everything ,and no good thing happen to these fish , for thirty years now.

The sockeye Salmon, not just a fish for pleasure ,

The sockeye not just a fish for food

The sockeye Salmon Balance the Eco system in our ocean, and we have to protect it .

catch and release must stop! this a blood sport !

killing for pleasure. @2500 to 3000 eggs never to leave the river , every fish that dies.

Remember , just on the Kenai the 100 million dollar fishery now gone!

I urge the board of fish to , claim a new type of salmon disaster , and just rule , till future notice .

to stop fishing in all rivers ,lakes and stream in Alaska .

fish your fish in the ocean

out side the mouth of all rivers

let the salmon have a resting and spawning area.

to rule against , maximum sustained yield for all users groups .

our salmon will then rebound , the 2500 to 3000 eggs , to be used will return .

The ph of the ocean is the real killer of our fish.We fix that , we will have salmon , for many years to come.



From: [Roni Carmon](#)
To: Fwd: Pink salmon relief
Subject: Saturday, September 28, 2019 1:20:48 PM
Date:

Begin forwarded message:

From: Dallasak789
Date: Sep 20, 2019 at 10:10 AM
To: Rep Stutes <rep.louise.stutes@akleg.gov>
Subject: Pink salmon relief

Louise:I'm writing on behalf of the cookinlet,salmon fishery.

This year: 7 million sockeye salmon was dipnet from the mouth of our two rivers,
Kenai ,and Kasilof.

That salmon sells retail 14.99 a lb.

And you get 5.5pounds of meat off a small salmon.

Or about 78 dollars a salmon ,retail value.

Or about 542 million dollars of salmon that goes no where ,as a resource ,that was what
fueled the economy for Alaska general fund.

You seen my complaint before.

I believe,adfg ,is funded by ,coastal conservation ass.

And about 20 thousand vendors.

To get access of Alaskan resource.

You seem , to really care about our Commerical fisherman.

And I'm one of them.

I like to ask you ?:

Will you team up with Sarah Vance.

And ,put a lawsuit against the coastal conservation ass.

Bass pro,and all box stores.

I believe,they've taken ,easily 44billion dollars worth of general fund revenue,from our
ocean.

And rivers and streams.

From that 44billion, each drift fisherman with permit for gill net fishing , get their lost
compensation of 3million dollars .

Tax free .

That would still give back to the state 40 billion to put back into the general fund.



They would gladly pay that ,
To gain access to our fish resource .the need it ,to sell stuff.

By doing this ,your buying back the permits.
No more permit system.

People can then ,choose to Commerical fish,
But no more permits.

The cookinlet could then be open to ,Gill net or purse seine.

It would solve the fish wars
All the legal ,would somewhat go away.

The guide industry,and charter boats , would have to stop fishing for free.

Would you do that !
The 4billion dollar ,you could balance the budget.
Again .
I believe for 30 years (1989to know)
Cookinlet contribution of 70 million a year to the general fund.
The state hasn't enjoyed, because of coastal conservation,and the sport stores.
If you was doing what trump doing to China,
Making fair trade fair.
This would be a must .

Would you do this?
In the end it would hurt no user groups,but it would save fish.

Please write me back ,or call me .

Ron Carmon



From: [Roni Carmon](#)
To:
Subject: Fwd: read these over before we submit them
Date: Saturday, August 17, 2019 1:27:57 PM
Attachments: [Carmon SB90 SRES 032919 DRAFT.docx](#)
[Carmon SB90 possible duplicate.docx](#)
[Carmon HB65 retyped.docx](#)
[Carmon HB65 Original.pdf](#)
[Carmon SB90 original.pdf](#)

Read all 5 if you would please

Begin forwarded message:

From: Dallasak789
Date: Jul 23, 2019 at 8:19 PM
To: Sen Micciche <sen.peter.micciche@akleg.gov>
Subject: Fwd: read these over before we submit them

Begin forwarded message:

From: MaryBea Byrne <marybea.byrne@akleg.gov>
Date: Apr 5, 2019 at 12:08 PM
To: Dallasak789
Subject: read these over before we submit them

Still need to make a few corrections/changes. Look these over for content, Roni, and we'll submit them on Monday.
mb

KENAI LEGISLATIVE INFORMATION OFFICE

Email: Kenai_LIO@akleg.gov

Phone: 907-283-2030 / Fax: 907-283-3075



PC115
22 of 37

WRITTEN TESTIMONY

NAME:

REPRESENTING:

BILL # or SUBJECT:

COMMITTEE:

AK
Sarah Vance Tomkins Tarr
edgman and the
rest of the House

DATE:

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

I'm asking you all, to please
collect the 44 billion Dollars from the
outside Groups that want our fish so bad.

This is the amount of money that needs to
be put back into the General Fund. That's
missing.

The Coastal Conservation doing this to every state
in the united state.
as is breaking the backs of the Commercial
fishery

This is small amount to a world wide organization
They want our fish
This is what you need to collect.

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Email: Kenai_LIO@akleg.gov

Phone: 907-283-2030 / Fax: 907-283-3075



PC115
23 of 37

WRITTEN TESTIMONY

NAME:

Roni Carman

REPRESENTING:

SELF

BILL # or SUBJECT:

HB 65

COMMITTEE:

DATE: 4/1/2019

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

In short you are Giving a resource away for free,
So what I just ~~heard~~ Told you.

The Commerical fishery ^{is} your only income
~~and~~ in the fishing income world to the
borough & the State.

The Commerical fisherman in Alaska, Kenai
Peninsula Borough has had over 13 million
fish taken away from them fisherman every year
and the state General Fund also,

The sport fishery has taken that income, and
none goes to the state or borough

The Dip net fishery takes but gives nothing back

Give the Commerical fishery back there 100 million
fishery, and let the stock rebound.

And Get your 20 million back to the General Fund
each year.

In short your industry will pay it way and the borough
will get that income.

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PC115
24 of 37

WRITTEN TESTIMONY

NAME:

REPRESENTING:

BILL # or SUBJECT:

COMMITTEE:

Borough fish tax DATE: 7/2019

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

The Borough receives no fish tax from the sport fishing association

The Borough receives no fish tax from the dipnet fishery on the Kenai peninsula

The sport fish association (been in a sunset) for 20 years now. They get their Guide license for free. (freshwater, saltwater)

The Dip net fishery gives nothing, but takes 7 million fish from the Kenai peninsula ~~per~~ commercial fish. That about 35 million dollars that goes no where. (~~could of gone to the General fund~~) it used to go the General fund

These fish ~~had~~ have been taken away from the General fund ~~for~~ since 1989, and Borough

fish and Game take's Personal fishing license and they pay ~~for~~ themselves and that borough tax money ^{is} not

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PC115
25 of 37

WRITTEN TESTIMONY

NAME: _____

REPRESENTING: _____

BILL # or SUBJECT: _____

COMMITTEE: _____

DATE: _____

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

So now the time to fix this mess
AdFG. is the problem, not the solution.

The Kenai Peninsula Borough need to manage the
local fisheries

The local boroughs need to manage their own fishery
for the health + welfare of the fish stock.
To be control by the people of their boroughs
and all over the state

The state adFG is being controlled by the
Coastal Conservation ass.

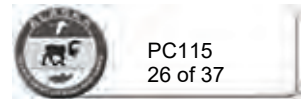
A world ~~wide~~ wide Group of Companies
that has no interests in alaska but to take
our fish.

And they pay nothing to alaska.

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WRITTEN TESTIMONY

NAME: Roni Carmon
REPRESENTING: Self
BILL # or SUBJECT: HB 65
COMMITTEE: _____ **DATE:** 04-04-2019

I'm asking you all to please collect the 44 billion dollars from the outside groups that want our fish so bad.

This is the amount of money that needs to be put back into the General Fund that's missing.

The coastal conservation is doing this to every state in the United State and is breaking the backs of the commercial fishery.

This is a small amount to a worldwide organization. They want our fish. This is what you need to collect.

In short you are giving a resource away for free, so what I just told you.

The commercial fishery is your only income in the fishing income world to the borough and state.

The commercial fisherman in Alaska, Kenai Peninsula Borough has had over 13 million fish taken away from them fisherman every year and the state general fund also. The sport fishery has taken that income and none goes to the state or borough.

The dipnet fishery takes but gives nothing back.

Give the commercial fishery back their 100 million fishery and let the stock rebound. And get your 20 million back to the general fund each year.

In short, your industry will pay it way and the borough will get that income.

The borough receives no fish tax from the sport fishing association.
The borough receives no fish tax from the dipnet fishery on the Kenai Peninsula.

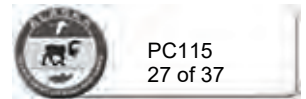
The sport fish association has been in a sunset for 20 years now. They get their guide license for free (fresh water and salt water).

The dipnet fishery gives nothing; but takes 7 million fish from the Kenai Peninsula commercial fish. That about 35 million dollars a year that goes nowhere. It used to go to the general fund. Those fish have been taken away from the General Fund since 1989 and borough.

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WRITTEN TESTIMONY

NAME: Roni Carmon
REPRESENTING: Self
BILL # or SUBJECT: HB 65
COMMITTEE: _____ **DATE:** 04-04-2019

Fish and Game takes personal fishing licenses and they pay themselves and that not borough tax money.

So now the time to fix this mess. ADFG is the problem not the solution.

The Kenai Peninsula borough need to manage the local fisheries.

The local boroughs need to manage their own fishery for the health and welfare of the fish stock. To be control by the people of their boroughs and all over the state.

The state ADFG is being controlled by the coastal conservation ass., a world-wide group of companies that has no interests in Alaska but to take our fish. And they pay nothing to Alaska.

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PC115
28 of 37

WRITTEN TESTIMONY

NAME:

Roni Lee Carlson

REPRESENTING:

Self

BILL # or SUBJECT:

90 Buy Back of Permits

COMMITTEE:

DATE: 3/30/2019

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

I've been fishing for a lot of years
I watch fish and game and our Government
miss manage, our Commercial fishery all them years
and then ~~fish and game~~ ^{fish and game} + politician get in their, and
ruin it ^{watched} all.

If. Bob Penney, Bass pro, all sporting good suppliers
Conservation Groups, Duck in Limited, association
of all sport manufacturers, some 20,000 different
organizations, want to buy permits. and fisherys
and commercial fisherman.
I'm all for it.

It's Always been said, Government will ruin any business
if not all business. And you've certainly ruined the
Commercial fishery.

So buy us all out, across the board.
and buy us out, the amount we contribute to the
General Fund.
Last year, we furnished the state 116 million dollars



WRITTEN TESTIMONY

NAME: _____

REPRESENTING: _____

BILL # or SUBJECT: _____

COMMITTEE: _____

DATE: _____

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

profit, To The General fund.
So Go back 30 years x the 146 million,
x That by 10 ^{billion} 44,380,000,000.00 = 44.3 billion.
To The Cookinlet Salmon + other Fishery's in
the Kenai Peninsula
equally split + regardless who caught what.

44.3 billion, nothing less.
or about 1,700 thousand ^{1 million 700 thousand} for each fisherman on the
Kenai Peninsula.
1, million 700 thousand. for about 2500 fishermen.

That's pretty much how much the state, made the
last 30 years of Commercial money to the
General fund.

In ~~that~~ those last 30 years: The state
could have made 70 million dollars a year more.
But the sport fishery + the dipnet fishery
took those money from the Commercial fisherman
and the General fund.



WRITTEN TESTIMONY

NAME: _____

REPRESENTING: _____

BILL # or SUBJECT: _____

COMMITTEE: _____

DATE: _____

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

See i told you. Government can't run anything
with out ruining it all, for every body.

a smart business man would fold his business
and go some where else.

But when your in the Game a million dollars
and you can't sell out. Because your indebt a million
and you loose your permit if you don't fish it

and then the state take your permit, Cause you didn't
fish your permit for a loss.

it become's a criminal act, but your Government

~~for~~ one million 2 hundred thousand a fair price
for decades of ~~torment~~ ~~torment~~ torture.



WRITTEN TESTIMONY

NAME: _____

REPRESENTING: _____

BILL # or SUBJECT: _____

COMMITTEE: _____

DATE: _____

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

I hope i enlighten all you government
Congress man , and adfg, employees
lobbist, and Bean Counters -

How Smart you really are
and what you have done , to your #1 best
renewable resource.

Instead of imposing a nother mistake, in
your every day Doings in bureaus

~~The~~ Lets make a deal, let's negotiate
a buy back.

Starting price 1 million 2 hundred thousand for
our fisherman Kenai peninsula borough fisherman
only

Remember Atlantic Richfield so there oil
Company for 28 billion, so you can sell your
fishery to the sport fishery also



WRITTEN TESTIMONY

NAME: _____

REPRESENTING: _____

BILL # or SUBJECT: _____

COMMITTEE: _____

DATE: _____

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

These Companies want our fish, then
44 Billion, a good price for them fish.
and it would be cheap, divided by all them
sport or like Companies.

The reason im writing this is.
The state can't manage the fishery fairly
so buy us out.

You Can Get Your 210 million to the General Fund
from the sport fishery, and the dipnet fishery

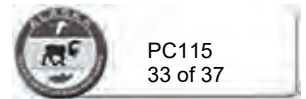
If you really have a buyer for half the set net
fisherman, you can get the money for all
commercial fisherman.

These fish bring 25⁰⁰ A Pound. So you can make
millions more by giving them to the sport fishing
ass. and the dipnet fisherman.

KENAI LEGISLATIVE INFORMATION OFFICE

Email: Kenai_LIO@akleg.gov

Phone: 907-283-2030 / Fax: 907-283-3075



WRITTEN TESTIMONY

NAME: Roni Carmon

REPRESENTING: Self

BILL # or SUBJECT: SB 90

COMMITTEE: _____ **DATE:** _____

So, as you can see today in the paper Governor Dunleavy appointed new Board of Fisheries members, some done with their 3 years, so maybe not.

But I urge you to look at what's happening. Board of Fisheries has their own set of rules. Fish & Game has their own set of rules.

Senate lawmakers have a set of rules.

But the Board of Fisheries and the Governor rule us commercial fishermen. And Fish & Game takes their rules and the Board of Fisheries' rules and they control us fishermen.

But over the last 30 years, the fish stocks seem to be going down. The sockeye salmon are the targeted fish now that the king stocks have been depleted. The guides hit all waters in Alaska, 300 days a year if not more.

The guides hit the Kenai Peninsula and other areas 175 days for salmon.

Never would you do that in a commercial fishing environment.

Board of Fisheries didn't hear my plea.
The Governor didn't hear my plea.
They dance to a different kind of music.

Their ears are tuned to sport fishing, guide fishing, and subsistence fisheries. Commercial fishery is a dirty word.

But the commercial fishery, managed correctly, is balanced, fair, and good for the fish's future, while guide fishing, sport fishing, and personal use goes unregulated.

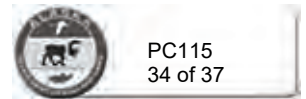
The commercial fishery gives an income to the state of 146 million a year. And if the Cook Inlet fisherman could fish, another 70 million to the general fund or 210 million.

The Senate and the House now know this. You all should be ashamed of your selves. To do this to our fish, our people, our schools. We are broke, as a state, only 770,000 people in Alaska and broke.

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WRITTEN TESTIMONY

NAME: Roni Carmon
REPRESENTING: Self
BILL # or SUBJECT: SB 90
COMMITTEE: _____ **DATE:** _____

I'm hoping you Senators and the House of Representatives top the guiding and personal use this year. Until you get a guiding license in place and until you all recover some taxes for the resource, I recommend about 44 billion dollars for the last 30 years.

I'm saying it again, as I just left testimony last week.

But the governor appointed a new Board of Fisheries. A new set of rules will be coming, and it's going to be against the commercial fisherman.

I believe if you stop the 300 days of fishing around the clock onslaught of fishing stocks will rebound. The rivers become a womb for spawning fish not the blood sport of catch and release. At the same time, you can receive money to the general fund by letting the commercial fleet fish. None of this is in the minds of the governor or the Board of Fisheries or Fish & Game.

But you legislators Have to stop this raping of Alaska and the raping of the fish stock and zero income to the state.

Please remember, Fish & Game never collected a license fee from guides and sunset rules are in place. \$1760 for the full license with requirements for 6.4 million guides possible.

On the Kenai River alone - 870 guides.
On the Kenai Peninsula - a total of 1082 guides.
In Alaska - unknown but all hit the water 300 days a year.

But 13 million fish on the Kenai Peninsula has transferred from the commercial fishery to guides, sport, and dipnet fishermen.

You stop the guide and dipnet fishery until you figure a way to recoup the lost income.

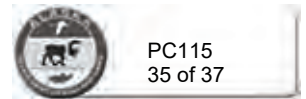
Let's give the fish a rest. If you get back the \$22 billion you could have earned from the sport fishery (guides) and the dipnet fishery, things could change a lot for the state. Nobody that deals with revenue would give away so many dollars. It's just plain dumb.

The Board of Fisheries and the Governor have no intention of regulating anyone but the people that are doing the fishery correctly and according to the law and every fair-trade agreement, if there is such a thing for a commercial fisherman.

KENAI LEGISLATIVE INFORMATION OFFICE

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Phone: 907-283-2030 / Fax: 907-283-3075



WRITTEN TESTIMONY

NAME: Roni Carmon
REPRESENTING: Self
BILL # or SUBJECT: SB 90
COMMITTEE: _____ DATE: _____

There's no intention of changing a thing.

I ask the Senate and the House to stop guides until they get a license.

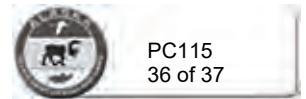
I ask the Senate and the House to recover the resources income never collected.

I ask you take that money the resource has earned and pay off all the bond debt and balance the budget.

KENAI LEGISLATIVE INFORMATION OFFICE

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Phone: 907-283-2030 / Fax: 907-283-3075



WRITTEN TESTIMONY

NAME: Roni Lee Carmon

REPRESENTING: _____

BILL # or SUBJECT: SB 90

COMMITTEE: SRES DATE: 3-29-19

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

I've been fishing for a lot of years. I watched Fish & Game and our government mismanage our commercial fisheries all those years and then watched Fish & Game and politicians get in there and ruin it all.

If Bob Penney, Bass Pro, all sporting goods suppliers, conservation groups, Ducks Unlimited, associations of all sport manufacturers (some 20,000 different organizations) want to buy permits and fisheries and commercial fishermen I'm all for it.

It's always been said, "Government will ruin any business, if not all business," and you've certainly ruined the commercial fishery.

So, buy us all out, across the board. And buy us out based on the amount we contribute to the general fund. Last year, we furnished \$116 million to the State's general fund.

So, go back 30 years X the \$116 million and multiply that by 10 = \$44,300,000,000 to the Cook Inlet salmon & other fisheries on the Kenai Peninsula, equally split, regardless of who caught what. \$44.3 billion, nothing less. Which is \$1,700,000 for each fisherman on the Kenai Peninsula; \$1.7 million for about 2,500 fishermen.

That's pretty much what the state made over the last 30 years of commercial fishing money to the general fund.

In those 30 years the state could have made 70 million dollars more per year but the sport and personal use dipnet fisheries took those monies from the commercial fishermen and the general fund.

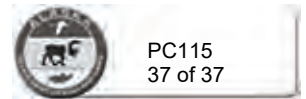
See, I told you. Government can't run anything without ruining it all for everybody.

A smart businessman would fold his business and go somewhere else. But when you're in the game with a million-dollar investment you can't sell out and you lose your permit if you don't fish it.

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WRITTEN TESTIMONY

NAME: Roni Lee Carmon

REPRESENTING: _____

BILL # or SUBJECT: SB 90

COMMITTEE: SRES DATE: 3-29-19

NOTE: This testimony is considered part of the official record and will be posted online with the hearing documents

The state will take it if you don't fish, even if you take a loss by fishing. This is a criminal act by your government.

\$1,700,000 – a fair price for decades of torture.

I hope I enlighten all you government and ADF&G employees, congressmen, lobbyists and bean counters how smart you really are and what you have done to your #1 best renewable resource.

Instead of imposing another mistake in your everyday doings in Juneau, let's make a deal. Let's negotiate a buy-back. Starting price, \$1,700,000 for our Kenai Peninsula Borough fishermen only.

Remember, Atlantic Richfield sold their oil company for \$28 billion, so you can sell your fisheries to the sport fishery industry also. If these companies want our fish then \$44 billion is the price for those fish, and it would be cheap when divided by all the sport fishing companies.

The reason I'm writing this is because the state can't manage the commercial fisheries fairly, so buy us out. You can get your \$210 million to the general fund from the sport fishery and personal use dipnet fishery.

If you really have a buyer for half the setnet fishermen, you can get the money for *all* commercial fishermen.

If these fish bring \$25 per pound as claimed, you can make millions more by giving them to the sport fishing associations and the dipnet fishermen.

SESSION ADDRESS:
Alaska State Capitol
Juneau, Alaska 99801-1182
(907) 465-4925
Fax: (907) 465-3517
Toll Free: 1-800-821-4925

Senator Gary Stevens

Alaska State Legislature



PC116
1 of 1

KODIAK, Alaska 99603
(907) 486-4925
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Reed Morisky, Chair
Alaska Board of Fisheries
C/O Board Support Section
P.O. Box 115526
Juneau, AK 99811

October 4, 2019

Dear Chairman Morisky:

Several local stakeholders have raised concerns that the January 11-14, 2020 Board of Fisheries (BOF) meeting will be relocated from Kodiak to Anchorage as a cost-savings measure. On behalf of the community and area fishermen, please consider this letter my request that the BOF honor its existing commitment to meet in Kodiak as scheduled. To the extent possible, and at its earliest convenience, I ask the Board to provide advance public notice of its intention to meet in Kodiak.

The BOF's role in fisheries management is critically important to our state. As such, it is incumbent upon the Board to provide maximum access to it from local department personnel and advisory committees, as well as stakeholders and other individuals directly impacted by BOF decisions. It is my belief that most in the fishing industry will agree that is best accomplished by meeting in affected areas. Shifting meetings away from rural areas may save money for the Board, but the risk of losing valuable input from those unable to afford attending meetings in Anchorage does not justify this savings.

Thank you for the opportunity to share my thoughts on this issue. I look forward to your reply.

Sincerely,

A handwritten signature in blue ink, appearing to be "G. Stevens".

Senator Gary Stevens



SUN'AQ TRIBE OF KODIAK

Federally Recognized December, 2000

RESOLUTION #22-2019

THE SUPPORT AND PRESERVATION OF THE ALASKA DEPARTMENT OF FISH AND GAME'S TRADITIONAL AND HISTORIC MANAGEMENT OF THE KODIAK SALMON FISHERY, AND MAINTAIN APPROVED LOCATION OF THE JANUARY 2020 BOARD OF FISHERIES MEETING IN KODIAK

- WHEREAS,** Sun'aq Tribe of Kodiak is a federally recognized Tribe comprised of Alutiiq people, headquartered within the City of Kodiak, Alaska; and,
- WHEREAS,** Sun'aq Tribal Council is the governing body for the Tribe; and,
- WHEREAS,** the Alutiiq people were the original stewards of the land and water resources in the Kodiak Archipelago and have developed rich cultures and enduring societies around their spiritual relationship to the waters, land and resources; and,
- WHEREAS,** the Alutiiq people been the users of salmon available in the Kodiak area for more than two thousand years or longer, based on archeological records; and,
- WHEREAS,** Ouzinkie, Port Lions, Larsen Bay, Karluk, Akhiok, Old Harbor and the Alutiiq people living in the City of Kodiak and throughout the Kodiak Island Borough are economically and culturally dependent on the Kodiak commercial salmon fishery; and,
- WHEREAS,** Kodiak's six Alutiiq rural communities as well as the City of Kodiak and Kodiak Island Borough are economically struggling due, in part, to dramatically reduced groundfish quotas and substantially lower exvessel prices, including reduced salmon prices; and,
- WHEREAS,** Kodiak's commercial salmon fishery is an historical fishery that developed from the earliest days of commercial salmon fishing in Alaska and has remained essentially the same fishery since the implementation of limited entry in 1973; and,
- WHEREAS,** the State of Alaska, acting through its agents on the Board of Fisheries and in the Alaska Department of Fish and Game, is constitutionally responsible for the sustainability of salmon fisheries for the common use of all people, and to manage these fisheries with the sustained yield principle without creating any exclusive right or special privilege and based on the historical scope and practices of the fishery; and,
- WHEREAS,** it is critical for residents of Kodiak's Alutiiq rural communities and the City of Kodiak to continue to have harvest opportunities throughout the Kodiak Management Area and to engage in Kodiak's historical commercial salmon harvest; and,



WHEREAS, testimony before the Alaska Board of Fisheries is important for both the Alaska board of Fisheries as well as for the residents of Kodiak's Alutiiq communities because Alutiiq community residents are frequently among those most heavily impacted by fisheries decisions, and yet rarely are provided the opportunity to speak with and be heard by those constitutionally mandated to represent them and to consider their livelihoods when making allocative decisions.

NOW, THEREFORE BE IT RESOLVED BY THE TRIBAL COUNCIL OF SUN'AQ TRIBE OF KODIAK THAT:

SECTION 1: Sun'aq Tribe of Kodiak hereby requests the Alaska Board of Fisheries to support and maintain the Alaska Department of Fish and Game's traditional and historic management of Kodiak's salmon fisheries, which align with Alaska's Constitutional mandates of management within the sustained yield principle for the common use of all people.

SECTION 2: Sun'aq Tribe of Kodiak hereby requests the Alaska Board of Fisheries to keep the January 2020 Alaska Board of Fisheries meeting in Kodiak to provide residents Kodiak's remote Alutiiq communities reasonable opportunity to testify before the Board of Fisheries

SECTION 3: This resolution shall take effect immediately upon adoption.

ADOPTED BY THE SUN'AQ TRIBE OF KODIAK

The foregoing resolution was passed and approved by a duly convened meeting of the Sun'aq Tribal Council, at which the required voting quorum was present and voted:

6 YES, 0 NO, and 0 Abstaining, this 30th day of September, 2019.

Thomas V. Johnson Jr.
Thomas Johnson, Jr. Chairperson

09/30/2019
Date

Heather Carlson
Heather Carlson, Secretary/Treasurer

09/30/2019
Date

Attest

[Signature]

09/30/2019
Date

Submitted By

Michael Crookston

Submitted On

10/7/2019 6:35:24 PM

Affiliation

I would like to voice my support of BOF meetings either being in the Matsu area or rotating. For many years the people who this impacts most have been unable to participate because of its location. We value transparency and this would help support that.