



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Peterson Bay & Canoe Pass, Alaska, and I participate in the commercial, subsistence, sport, and public use salmon fisheries of the Prince William Sound Region. I am a commercial salmon permit holder for this region and chose to invest in this region because of the enhanced runs provided by hatcheries. Salmon are the main reason we are in the PWS area. Our business relies completely on the salmon runs of this region, and without the enhancement of hatchery runs we wouldn't have chosen to invest and work in PWS. Salmon are how we make our livelihood and feed ourselves and community. Without the hatcheries of the region we would simply not be here.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

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If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Jacob Privat
jnprivat@gmail.com
(337) 412-8785

Submitted By
James Glenn Pulkrabek
Submitted On
11/8/2021 8:54:18 AM
Affiliation

Phone
19072235809

Email
jimp@mtaonline.net

Address
PO Box 1625
Palmer, Alaska 99645



Proposal 6 -Oppose! Reporting as of now is works fine and requiring 3 day reporting impacts travel plans because of lack of internet access in the area could impact peoples travels plans and will reduce tourism opportunities for local businesses.

Proposal 7 - Strongly Oppose! Banning guide services will prevent access to thousands of users who do not own a boat or do not wish stand on slippery rocks or wade into the fast current to try and catch fish. Properly licensed and vetted Guide services provide safe access to residents who would otherwise be unable to participate.

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fisherman and their passengers.



Proposal 12- Strongly Oppose!

There are a few places in the PU fishery that this interaction occurs. There are only a handful of locations to safely Dipnet from a boat in the PU where as there is nearly 20 miles of river bank for people who wish to Dipnet from shore can. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetter who wade into the water in the same drift as boats are putting themselves at risk and present a hazard to navigation. By pushing out 30-40' poles these folks run their nets under the running gear of the boats presenting a possibility of fouling the motor and setting the vessel dead adrift creating a safety hazard for the captain and crew.

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King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

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The use of sonar on while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ



sonar, aerial spotters and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more an aid to navigation than to find fish.

The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied. "

Proposal 17 - Strongly Oppose!

This proposal restricts the method of take by putting a penalty on a safer more time effective method of take and an additional burden on the user to obtain multiple permits and additional reporting.

Proposal 18 - Strongly Support!

This proposal offers a reduction in congestion along the lower limit of the fishery. On busy days this area can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long" there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition though incrementally small adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In

years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.



Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who what to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.



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I live in Valdez, Alaska and I participate in the sport salmon fisheries of the Prince William Sound region. I'm a long time resident of over 50 years. Some of my family members commercial fish in PWS and some of them work at VFDA. The hatchery in Valdez and others around the state are very important to our economy.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Janet Blood
janet.l.blood@gmail.com
(907) 835-2718



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I'm a Logistics Coordinator for OBI Seafoods. I move supplies to and fish from our plants in Alaska. From the early planning for the first Copper River opener to the last pink salmon going into the can each year, my life is run by the ebb and flow of fish through our Cordova plant. I help move millions of pounds of fish out of Alaska by air, steamship, truck and barge. My role is a vital part of Alaska's economy, and it's largely thanks to healthy, sustainable hatchery production. For over 37 years, the PWS and other Alaska fisheries have provided my livelihood. Much of who I am and what I have is because of Alaska salmon.

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Sincerely,

Jeanne Benson
jeanne.benson@obiseafoods.com
(206) 769-4901



Alaska Department of Fish and Game



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* Indicates a required field

Board Meeting Select a meeting (Meeting Title - Comment Deadline) **Prince William Sound**

Name * **JEANNE SUNDER** Affiliation

Contact Phone * **907 822-3088** Email * **JEANRENEART@gmail.com**

Address Line 1 * **MILE 101.5 OLD RICHARDSON HWY.**

Address Line 2 **P.O. BOX 379 COPPER CENTER AK. 99573**

City * **COPPER CENTER**

State * **AK** - v Zip * **99573**

Do you consent to your contact information being included on printed copies of your comment? *

Yes No

Comment *

Format

I AM WRITING IN CONCENT TO SUPPORT THE BONNIE MCLEOD PROPOSAL FOR REGULATIONS ON GRAYLING POPULATIONS IN MOOSE CREEK. THE GRAYLING POPULATION HAS BEEN DECLINING, SOON TO BE GONE. I WHOLY AGREE WITH HER PETITION TO REQUEST REGULATING GRAYLING BAG LIMITS ON MOOSE CREEK. AS A LOCAL SPORT FISHER PERSON, I HOPE NOT TO SEE THE GRAYLING POPULATION IN MOOSE CREEK DISSAPEAR.

body p
Words: 0 (Limit: 5000)

Click submit once. The process may take several moments. You will receive an email confirmation. Difficulties? Contact 465-4110 for Boards Support staff, or click the "About Submitting Comments" tab above for other ways to submit.

Thank you!



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I live in Cordova, Alaska, and I participate in the commercial, subsistence, and sport salmon fisheries of the Prince William Sound region. I arrived in Cordova, Alaska in 1981 when this community was actively promoting and building a new hatchery in southwest PWS which is now called AFK. Since then I have participated as a commercial fishermen and limited entry permit holder in drift and seine fisheries. My children are all involved in the commercial fisheries and plan on making their livelihoods in these fisheries. I have served as chairman on the Copper River & Prince William Sound Marketing Association which promotes its producers and the value of these fisheries which contribute raw fish taxes to the State of Alaska and the communities of PWS. I also was a founding member and President of Prime Select Seafoods Inc. which operated a shore based processor in Cordova, Alaska for over 20 years adding value to the Copper River and PWS salmon resource. My livelihood and family have all been dependent on these resources and hatchery contributions to the resource. I have been commercially fishing for my livelihood for over 38 years. I am a limited entry permit holder in both Drift net and seine fishing in the Copper Rive and PWS. My three children are all working in the commercial fisheries and plan to purchase limited entry permits here.

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Sincerely,

Jeff Bailey
jjeffish@gmail.com
(907) 441-6775

Submitted By
Jeff Moore
Submitted On
11/15/2021 10:14:43 PM
Affiliation



PC107
1 of 1

I would like to object to the proposal number nine from the Copper River advisory committee to ban dip netting from a boat above the bridge on the Copper River. This would eliminate subsistence fishing for many of us that have done this for many years. This is a small fraction of the fish that are harvested on this river that has met its escapement goals for many years. This would also eliminate a healthy source of food for many of our families. Thank you for your consideration



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I participate in the salmon fisheries of the Prince William Sound Region through processing. As a sales manager for OBI Seafoods, I am very involved with the seafood dependent economies of Seward and Cordova. The salmon fishery in Prince William Sound represents a significant amount of OBI's yearly production in the region and is extremely valuable to OBI, our fishermen and the communities we operate in.

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Jeff Otness
Jeff.Otness@OBISeafoods.com
(206) 601-9594



Submitted By
Jennie Tschappat
Submitted On
11/14/2021 8:29:19 PM
Affiliation

Phone
9072236461

Email
jtschappat@gmail.com

Address
PO Box 706
Glennallen, Alaska 99588

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The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal this with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied."

Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer more time take and an additional burden on the user to obtain multiple permits and additional reporting.



Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. Or can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition though incrementally small adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who what to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.

Proposal 22 - Support!



Submitted By
Jennifer G. Patronas
Submitted On
11/7/2021 10:19:09 AM
Affiliation

Phone
9072308339

Email
jennifer.patronas@gmail.com

Address
19638 DELPHIN CIR
EAGLE RIVER, Alaska 99577

I strongly oppose proposals 6-20. My family of 5 uses the Copper River to fish for salmon that we use all year long. Banning Copper River from dipnetting will greatly affect my family's ability to get our annual limit of salmon which we use daily during the winter months.



Submitted By
Jenny Moser
Submitted On
11/14/2021 9:00:16 PM
Affiliation

Phone
9072901498

Email
m2cyclone@gmail.com

Address
HC60 292D
Mile 14 Edgerton hwy
Copper Center, Alaska 99573

Proposal 6 -Oppose! Reporting as of now is works fine and requiring 3 day reporting impacts travel plans because of lack of internet access in the area could impact peoples travels plans and will reduce tourism opportunities for local businesses.

Proposal 7 - Strongly Oppose! Banning guide services will prevent access to thousands of users who do not own a boat or do not wish stand on slippery rocks or wade into the fast current to try and catch fish. Properly licensed and vetted Guide services provide safe access to residents who would otherwise be unable to participate.

Proposal 8 - Oppose! Language is too vague and would restrict access to the Personal Use and Subsistence Fishery at the Bridge, O'Brian Creek, Terral Creek, Eskaleta Creek and Haley Creek. All of these drainages are popular access points for users.

Proposal 9 - Oppose! Language is too vague and would restrict access to the Subsistence Fishery at the Bridge.

Proposal 10 - Strongly Oppose! This proposal lacks common sense and would effectively force everyone to Dipnet from the shore leaving dip netter to stand on slippery rocks or wade into the river. This puts users at undo risk, (most river deaths have come from dipnetters falling into the river, not dipping from a boat)

Proposal 11 - Strongly Oppose! This proposal would like all boaters who navigate their boats into the canyon could only tie off to the canyon walls or shore. As a professional mariner I feel that forcing lay people to navigate their boats into very very sketchy currents is a receipt for disaster and puts undue risk to the fisherman and their passengers.

Proposal 12- Strongly Oppose! There are a few places in the PU fishery that this interaction occurs. There are only a handful of locations to safely Dipnet from a boat in the PU where as there is nearly 20 miles of river bank for people who wish to Dipnet from shore can. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetter who wade into the water in the same drift as boats are putting themselves at risk and present a hazard to navigation. By pushing out 30-40' poles these folks run their nets under the running gear of the boats presenting a possibility of fouling the motor and setting the vessel dead adrift creating a safety hazard for the captain and crew.

Proposal 13 - Strongly Oppose! Fish wheels are stationary hazards that boats avoid. By limiting navigation near fish wheels the proposal could eliminate access to the entire length of the Kotsina flood plain just above the bridge forcing everyone to fish across the river on the West Bank of the Copper. One person's "too close for comfort" is not another's. Data needs to be provided that demonstrates actual accidental contact or fowling of Dipnet gear from a boat with a Fishwheel. The hazard lies with the boat operator who could expect to capsize on contact with a wheel and thus can navigate around this hazard with this knowledge. Whether its a Fishwheel operator who drives a boat to their wheel or a dipentter the boat is only a momentary sound that quickly passes and does not impact fishing success. If it did the Fishwheel operator would not run a boat near their wheel.

Proposal 14 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 15 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar on while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, aerial spotters and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more and aide to navigation than to find fish.

The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal this with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be

denied. “



Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer more time take and an additional burden on the user to obtain multiple permits and additional reporting.

Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. On busy days this area can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long” there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition though incrementally small adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who want to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.

Proposal 22 - Support!

Submitted By
Jenny Nakao
Submitted On
11/15/2021 10:44:35 PM
Affiliation



PC112
1 of 3

OUTLAW DIVE BOMBING of COMMERCIAL FISHERMEN by ALASKA WILDLIFE TROOPERS

Please establish legal guidelines for Alaska Wildlife Trooper pilots operating small aircraft to monitor commercial fishermen. Set a minimum distance a Wildlife Trooper is allowed to fly their plane at a commercial fishing vessel. Establish a maximum number of passes allowed on a single vessel at said distance. Require Wildlife Trooper Pilots to video record their flight path (not just a flat GPS track line) to help monitor the depth at which they are diving at commercial fishermen.

This dive bomb tactic is being used by pilots on the Copper River / Prince William Sound to monitor commercial fishermen with or without any obvious crime being committed. Such behavior can actually be the causation of fishing violations such as drifting too far or fishing past time by creating confusion or accidents. Worse than a citation, these harassing dive bombs may result in someone getting injured. Veterans, fishermen with children on board and people with heart conditions may be especially vulnerable. Commercial fishing inherently has enough dangers and stresses without the added trauma of being repeatedly dive bombed by a plane.

Furthermore, if Alaska Wildlife Troopers are *not* dive bombing sport fishermen, subsistence fishermen or a personal use harvester then this is a biased tactic reserved for commercial fishermen. The responsibilities of a healthy fishery lies on all participants of the fishery and enforcement of regulations should apply to all participants. So, if you cringe at the idea of a family dipnetting on the banks of the Chitina getting repeatedly dive bombed by a Wildlife Trooper then please act to protect the commercial fishermen, women and families being dive bombed on their commercial fishing vessels.



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Seward, Alaska, and I participate in the commercial and sport salmon fisheries of the Prince William Sound region. My life and income are centered around commercial fishing in PWS.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region,



especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Jenny Nakao
jennynakao@hotmail.com
(907) 362-0062



Submitted By
jerry foster
Submitted On
11/2/2021 12:33:14 PM
Affiliation

Phone
9072526206

Email
jerry_geri@hotmail.com

Address
36238 Bradford Rd.
PO Box 1147
Sterling, Alaska 99672

I went halibut fishing out of Homer this summer on a "charter-free" Wednesday and there were charter boats (binoculars) anchored in the first two spots I usually stop, so I moved on until we were clear of any other fishers.

As I reflect on the new "fishing quote" program from my point of view it seems like a clever reallocation of halibut from sport to charter operators who are clearly commercial fishers. Sport fishers are not a cohesive political lobbying group and I suspect their views were not represented in whatever process was used.

When I fish halibut in the Juneau area I've seen small structures "plugged" with charters - given the more limited number of fish, this is a problem.

I wanted to voice my displeasure with this program and although the feds manage the halibut fisheries, Alaska also plays an important role.



Submitted By
Jesse Jones
Submitted On
11/9/2021 7:41:35 AM
Affiliation

Phone
9074144949
Email
jesse.jones@protonmail.com
Address
2171 N Verde Dr
Palmer, Alaska 99645

Hello,

I have been participating in the Personal Use dipnet fishery on the Copper River for at least a dozen years now. The salmon I catch on the Copper provides 25% of the meat consumed by my family each year, and provides for my elderly in-laws as well. While I have enjoyed both dipnetting from the bank as well as from a chartered boat, I can affirm that my success rate and safety is significantly increased when fishing from a boat.

By enacting the proposed restrictions on Personal Use and Subsistence fisherman to force them to shore-based dipnetting you will see significant negative effects on the fishery, the charters and their staff, as well as the residents who have come to depend on Copper River salmon as a key part of their sustenance throughout the year.

1) Limited "safe" places to dipnet from the bank within the boundaries of the Personal Use dipnet fishery creates artificial limits on the number of people allowed to fish. With a fixed number of spots available and fluctuations in water levels further restricting availability, many people are left without an opportunity to participate in the fishery at all. As it stands today, many people find themselves without a spot to dipnet. Introducing restrictions on dipnetting from a boat will increase the pressure on the limited spaces available. Without also increasing the area in which we are allowed to dipnet, you will remove a valuable food source from a lot of families

2) Many of the places where people are able to dipnet from the bank are on steep cliffs which require them to "tie off". This significantly increase the danger posed to the fishermen, in addition to the inherent dangers of fishing in such a large, fast, cold river. Providing food to my family shouldn't require me to put my life in danger for prolonged stretches of time. If you haven't witnessed fishermen dangling from a cliff, tied to a tree above, just to catch a handful of fish, I would encourage you to visit the Chitna Dipnet Fishery for yourself this summer. For more fun, see a couple stranded on a rock with no escape for 8 hours until a boat comes back to pick them up again.

3) Fishing from the boat provides economic stimulus to the local community, and the region, by providing employment and meaningful income to our residents. By eliminating dipnetting from the boat you are eliminating jobs in an environment where the economy has plenty of other challenges on its own. This proposed rule would also disproportionately affect some charter companies while ensuring the success of others.

As you can see, the proposed changes to the Chitna Dipnet Fishery will have many negative impacts on the residents who depend on it. For this reason I encourage you to vote no and keep our fishery the way it is. Thank you.



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I am a commercial fisherman and live in Homer. Our family has fished the Prince William Sound for 50 years, starting before hatcheries when it was difficult to make a good living. One of the beautiful benefits of hatchery production is that it generates adequate income for many crew members to attend college or trade schools. Over the years, our crew members have studied to become doctors, nurses, engineers, teachers, foresters, biologists and business owners. This is very beneficial to the State of Alaska.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Jessie Nelson
nukapointfish@gmail.com
(907) 235-8778

Submitted By
Jim Cox
Submitted On
11/15/2021 7:52:38 PM
Affiliation



PC116
1 of 1

I voice a strong objection to proposal 9, specifically to eliminating the use of boats in the Glennallen sub district. For parties under personal or household subsistence permitting.

My family relies on the ability to sustainably harvest salmon under a subsistence permit on the Copper River. This proposal would severely reduce our fishing opportunities and limit the number of fish we count on.

A concern was voiced regarding the number of fish reaching the spawning areas. However, the annual harvest from subsistence is significantly lower than that of commercial or personal use. This information can be found in a harvest study published by the department of Fish and Game, looking at the fish harvest counts during a 10 year span, from 2009 - 2019. Subsistence was 1/2 of the personal use harvest counts and significantly lower than commercial. It would be more beneficial for a reduction in all fish harvest counts allowed for all parties, rather than close off boat access. This restriction would only single out those who are fishing under subsistence permitting. We are fortunate to live in a state with subsistence opportunities, families depend on and I believe they should be protected.

Thank you for your time,

Jim Cox



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Whittier, Alaska, and as the City Manager in Whittier, we collaborate closely with Whittier Seafood Processing, charter operators, commercial fishing operators and every aspect of fish life here on Prince William Sound. As the manager, I work closely with the Whittier Chamber of Commerce, commercial and private fishing vessels and clearly see the alignment and dependence on hatchery fish. The economic return is remarkable and the dollars from the industry roll over several times within our community and region. Whittier at the moment depends on tourism and FISH. Whittier Seafood is a key economic engine here.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

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Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Jim Hunt
citymanager@whittieralaska.gov
(907) 202-2442

Submitted By
Jim Vohden
Submitted On
11/15/2021 11:07:54 PM
Affiliation



PC118
1 of 2

I have dipnetted in the Copper River for more than thirty years. From shore, from a boat, using a charter, doing it all ourselves; I have been fortunate to utilize all these methods to secure fish for our family over the years. I have passed this on to my children. It is a very important means for us to gather fresh, wholesome salmon. A tradition which cannot be replaced. I whole heartedly believe that the needs of the personal use fishery should supercede that of the commercial fishery.

I fully support the comments below as submitted by the Chitina Dipnetters Association and hope you will consider them carefully in your deliberations. Thank you.

Chitina Dipnetters Association
Public Comments Concerning Submitted Proposals To The December 2021 PWS/Upper Copper and Upper Susitna Finfish BOF Meeting

The Chitina Dipnetters Association recommends the following support or opposition to these proposals put before the Alaska Board of Fish at the December, 2021, meeting in Cordova. The Proposal Book for this meeting with the full proposal texts may be found at the Board of Fish website (<http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2021-2022/proposals/pws.pdf>)

Prop. 5 - support

Prop. 6 - oppose

Prop. 7 - oppose

Prop. 8 - oppose

Prop. 9, 10 & 11 - oppose

Establish an Optimum Escapement Goal (OEG) for Copper River chinook salmon, increasing the escapement goal to 24,000-40,000.

Require in-season reporting of harvest for the upper Copper subsistence, sport and personal use fisheries.

This would require that dipnetters report daily harvest within 3 days of catch rather than end-of- season harvest reporting. This is a recurring proposal to the BOF. It has been rejected by the BOF each time mainly because F&G says in-season reporting is not needed to manage these upriver fisheries. Management of these fisheries and the in-river salmon goal is dictated by actual daily sonar counts at the Miles Lake sonar.

Prohibit guiding in subsistence finfish fisheries.

Many people rely on guided salmon dipnet harvest to supplement their annual family food supply.

Prohibit dipnetting within 500yds below and 100 yds above any stream entering the Upper Copper River.

This would eliminate dipnetting near the mouths of O'Brien Creek, Haley Creek, the Chitina River and, if I read it right, any small creek entering the Copper, further limiting harvest opportunity. Dipnetting is already limited, by regulation, to the main stream of the Copper River and prohibited in any stream entering the Copper.

Prohibit dipnetting from a boat in the Upper Copper River District.

Public access along the Copper River is very limited for shore based dipnetting, especially in the Glennallen sub-district of the Upper Copper River District. Because access is limited, many dipnetters have opted to use their own boats to access the river and to dipnet salmon. Dipnetters have a set annual limit and once that limit is reached, they are done for the year. Dipnetting from boats is a popular means of obtaining that limit.

Prop.12 - oppose

Prohibit dipnetting from a boat when within 50' of a person dipnetting from shore in Chitina Subdistrict.

Talk about an enforcement nightmare.

Prop. 13 - oppose

Prop. 14 &15 - oppose

Prop. 16 - oppose

Prop. 17 - oppose

Prop. 18 - support

Prohibit dipnetting from a boat within 75' of any operating fish wheel.

Enforcement nightmare.

Prohibit use of gillnet mesh in dipnets because it harms king salmon to be released that are tangled in the mesh.

Alaska regulation 5AAC 39.105 states a dipnet mesh must be less than 4.5" stretch mesh. In my experience, the only problem with releasing fish from gillnet mesh is the smaller sockeyes that actually get stuck halfway through the mesh. King salmon, no such problem.

Prohibit the use of depth or fish finders on boats in the upper Copper River District.

The only person I know that tried to use a fish finder in the Copper said it was of little use in the fast, heavily silted water.

Establish specific permit and bag limits when dipnetting from a boat in the Glennallen subdistrict. (The Glennallen subdistrict is the subsistence area upstream of the bridge, not a personal use area.) Access to shore based dipnetting upstream of the bridge is very limited due to private land ownership and few roads accessing the river. Dipnetting from boats is a means by which some people are able to harvest their salmon. Shore and boat dipnetting should continue under a unified permit structure – there is already a checkbox for

selecting gear type when applying for the permit.

Extend lower boundary of the Chitina subdistrict 1/2 mile downstream.



This is a Chitina Dipnetters Association submitted proposal to address a safety issue. A favorable and high use area from boats lies at the downstream end of Woods Canyon, on the east side of the Copper River, just upstream of the CPUDF. This short drift area is only approximately 250 yards long, has a gravel bottom and stays relatively snag free, saving the loss of \$150+ dipnets. This short drift area has become the go-to spot for boat dipnetters and often becomes very congested with 15 or more boats drifting the same area. Extending the existing CPUDF lower boundary 1/2 mile downstream would allow more spacing between boats, and alleviate the congestion of boats that occurs now.

Prop. 19 - oppose

When by June 1 the commercial harvest is 50% below the 10 year average, then the Chitina Personal Use sockeye allocation would be reduced from 150,000 to 50,000.

The Personal Use harvest times and lengths are dictated by actual sonar counts. When run numbers are low, it shows in the sonar counts and F&G reduces the PU dipnet opening times and lengths accordingly to meet in-river goals. When commercial harvests are low it is reflected in low sonar

counts triggering reduced fishing time in the PU fishery. To reduce the PU fishery allocation on top of reduced fishing time is a double hit. If the run rebounds 2 weeks later, the PU fishery would still be stuck with a 2/3s allocation reduction.

Prop. 20 - oppose

Prop. 21 - support

Prop. 22 - support

Prop. 41 - oppose

Reducing the annual limit in the Chitina subdistrict to 15 salmon for a household of one and 30 salmon for a household of more than one. CDA fought hard to get the Personal Use annual limit raised to 25 for the permit holder and 10 fish for each additional household member. F&G supported this bag limit increase at the 2014 Cordova PWS/Copper River finfish BOF meeting. It standardized the PU annual limit between South-Central Alaska PU fisheries and the Chitina PU fishery, thus eliminating confusion between the PU fisheries and making it a more equitable harvest for larger families.

Amend the opening date of the Chitina PU. fishery from June 7 to June 1.

If salmon sonar numbers warrant it then the Chitina PU fishery should open On June 1 as it did in the past.

Eliminate the Customary and Traditional finding for finfish other than salmon in the Chitina subdistrict.

If there is no customary and tradition finding for salmon in the Chitina Subdistrict, then why should there be a positive finding for other finfish?

Repeal mandatory closed waters from the Copper River King Salmon Management Plan.

Mandatory inside closures during commercial fishing statistical weeks 1&2 were initiated to protect those early run kings, that thru F&G radio telemetry programs, were determined to be those fish that go farthest upriver to spawn and supply the upper Copper subsistence fishery. To say that in the last several years the king salmon population has been healthy is a stretch as I remember upwards 20 years ago that today's total annual king run for the Copper River of say 60,000 is what the commercial fishermen out of Cordova were harvesting and we still met the total in-river goal.



Submitted By
John nobles
Submitted On
11/7/2021 7:41:37 AM
Affiliation

Phone
661-477-5595

Email
Johnabdmissy1989@yayoo.com

Address
2485 chief Nickoli
Fairbanks , Alaska 99712

I appose to these copper river changes. Why would you even consider banning boats from dip netting. That makes no common sense. My boat is a jet boat and in no way can harm a fish. Fishing from a boat is one of the best ways to fish in any lake or river. It provides me with better access to the spots and is safer. I have personally fell in the river from one of the spots you are dropped off at. That is such an unsafe way to fish. Again I appose.

Submitted By
John Stack
Submitted On
11/14/2021 8:12:27 PM
Affiliation
Area E Drift permit holder



PC120
1 of 6

I urge the board to reject Proposal 5.

An optimal escapement goal of 40,000 Chinook is not supported by ADFG, nor is it based on the Biological Escapement Goal for king salmon in the Copper River drainage. In 2017, ADFG recommended lowering the goal to 18K for the health and sustainability of this Chinook run. The Board should defer to the Department's recommendation of all escapement goals pertaining to this watershed.

Submitted By
John Stack
Submitted On
11/14/2021 8:23:50 PM
Affiliation
Area E Drift permit holder



PC120
2 of 6

Support proposal 7

Prevent subsistence from becoming a commercial enterprise.

Submitted By
John Stack
Submitted On
11/14/2021 8:38:08 PM
Affiliation
Area E Drift permit holder



PC120
3 of 6

Please Support proposal 17

These bag limits seem generous and would help with conservation of stocks.

Submitted By
John Stack
Submitted On
11/14/2021 8:47:03 PM
Affiliation
Area E Drift permit holder



PC120
4 of 6

Please Support proposal 19

It makes sense that in years of low abundance, all user groups share in the conservation of the stock.

Submitted By
John Stack
Submitted On
11/14/2021 9:06:42 PM
Affiliation
Area E Drift permit holder



PC120
5 of 6

Please Support proposal 38

In years of low coho abundance, conservation efforts should be shared by the sport fishery.

Submitted By
John Stack
Submitted On
11/14/2021 9:15:53 PM
Affiliation
Area Drift Permit holder



PC120
6 of 6

Please Support proposal 41

It makes sense to allow FG to manage the fishery based on observations of abundance and not have mandatory closures imposed by regulation.

Submitted By
Johnathan J Hulse
Submitted On
11/7/2021 1:32:52 AM
Affiliation
None



- Proposal 7 - Oppose
- Proposal 8 - Oppose
- Proposal 9 - Oppose
- Proposal 10 - Oppose
- Proposal 11 - Oppose
- Proposal 12 - Oppose
- Proposal 13 - Oppose
- Proposal 14 - Oppose
- Proposal 15 - Oppose
- Proposal 16 - Oppose
- Proposal 17 - Oppose



Submitted By
Jordan Bancroft
Submitted On
11/11/2021 7:47:18 PM
Affiliation

Phone
5416801747

Email
jtoextreme@hotmail.com

Address
2608 west 66th ave
anchorage, Alaska 99502

My family dipnets from a boat on the copper so harvesting via boat is critical for us to get our fish. We do not support any proposal that would restrict access to the dipnet fisheries.

- Proposal 6 – Oppose!
- Proposal 7 – Strongly Oppose!
- Proposal 8 – Oppose!
- Proposal 9 – Oppose!
- Proposal 10 – Strongly Oppose!
- Proposal 11 – Strongly Oppose!
- Proposal 12 – Strongly Oppose!
- Proposal 13 – Strongly Oppose!
- Proposal 14 – Strongly Oppose!
- Proposal 15 – Strongly Oppose!
- Proposal 16 – Strongly Oppose!
- Proposal 17 – Strongly Oppose!
- Proposal 19 – Strongly Oppose!
- Proposal 20 – Strongly Oppose!

- Proposal 18 – Strongly Support!
- Proposal 21 – Support!
- Proposal 22 – Support!

Submitted By
jordan stover
Submitted On
8/13/2021 8:01:29 AM
Affiliation



PC123
1 of 1

Would like the board to consider gear options for the PWS/Copper River drift gillnet fleet to use a 150 fathom purse seine net.

Options that are already going on in fisheries along the west side of Alaska.

Bycatch rates and mortality on current gear, gillnets, can be very high. Fish getting shaken out and falling to the bottom of seafloor severely fatigued or dead. Along with areas being taken over from multiple generations of marine mammal predators having breakfast, lunch and dinner from a web curtain being hauled flat/vertical. Ghost nets. (lost gillnets continuously killing for years)

When the gillnet fleet targets a certain species, say chums, majority of reds and pinks are being scraped and fatigued going through net web. Resulting in over escaping of certain systems and unknown surplus of natural resources. After decades of targeting a certain size, typically large, from schools it is causing only small fish to make it up river to spawn.

Seine nets are widely known as a more conservative and selective gear type. A small class seine fleet (compared to existing seine fleet) in PWS/Copper River, I believe will address many concerning issues along with lower bycatch of mammals and of fish species and a more consistent evaluation of river systems. Better product and more opportunities for fishing pinks. In times of conservative management, say King salmon, will provide more fishing time to fleet and the ability to release.



Submitted By
joseph f fleming
Submitted On
11/9/2021 3:36:28 PM
Affiliation
commercial fisherman

Phone
14807354167
Email
josephfleming52@hotmail.com
Address
6948 fairweather dr. Dowling
anchorage, Alaska 99518

November 8, 2021

To the Board of Fisheries:

My name is Joseph Fleming. I have fished in Prince William Sound for 50 years as a setnetter and drifter. I do remember when Eashamy was basically a senetters' district that had fishermen harvesting a thriving natural run of Eshamy River reds. When the hordes of drifters from Cordova invaded the district, fishing numbers took a nosedive. Seiners were allowed to fish off of Chenega, and that also contributed to the drastic decrease in the natural run of reds and chums. The astounding solution the Fish and Game came up with was to shut down setnetters year after year during the 70's until the permits were practically worthless.

The Main Bay Hatchery and an improvement in management saved the value of permits. That being said, it has been a battle for years to keep the drifters drifting drifting instead of setnetting between setnetters' registered sites. Drifters managed to get into the books that they could fish 50 fathoms away away from setnetters' nets that had to be 100 fathoms apart and 25 fathoms away from setnets that had to be 50 fathoms apart. Any person with common sense could see that it would be an impossible task to hold a a drifting net exactly on the legal mark.

Then the drifters and seiners took it a step further and had an allocation plan created by crying that setnetters were catching too many fish in comparison to drifters. This plan to make fishing more equitable was just a way to squeeze and shorten the time setnetters have their nets in the water. The time has been whittled down to 36 hours a week like in 2021. The huge seining and drifting fleets have had their way in controlling the small group of 18 to 20 setnetters who fish hard every opener. Crewmembers have to tirelessly wait for days in very remote camps before they are allowed to fish again, and food bills, restlessness, and bad weather make matters even worse.

To put an allocation of 4% was a terrible injustice to begin with, and now drifters are trying to change the trigger points to further decrease fishing time for setnetters. This is obscene and anyone pushing for it should be ashamed of themselves. I have been a drifter since 2006, and I do not advocate for any changes that would make any fisherman sit idly by on the beach while the fish are running. Setnetters have no other district to fish in like drifters, so they shouldn't stand for any regulations that devalues their fishery. The whole allocation plan should actually be challenged in court.

Joseph Fleming



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 1:17:20 PM
Affiliation
Area E permit holder F/V Wild Salmon

Phone
907-290-0976
Email
jdmeredi@gmail.com
Address
PO Box 1731
Cordova , Alaska 99574

I strongly support Proposal 6. As a commerecial permit holder in Area E all my fish caught are reported with AD&FG and are utilized for management purposes of the fishery.

With today's technology this should be a simple task for ALL people utilizing the fishery including sport, personal use and subsistence.

I feel the Board should PASS this proposal.



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 1:54:07 PM
Affiliation
Area E permit holder F/V Wild Salmon

Phone
907-290-0976
Email
jdmeredi@gmail.com
Address
PO Box 1731
Cordova , Alaska 99574

I strongly support Proposal #7.

No commercial enterprise should capitalize on subsistence fisheries including personal use or subsistence. As an Area E permit/permit owner and pay taxes and fees to both the state of AK and City of Cordova. It seems out of order to be finically competing with charter companies up river in the Chintina district who are aiding local Alaskans on their personal use and subsistence adventures. These companies pay less fees and taxes and are reaping financial rewards.

I feel strongly the Board should Pass this proposal.



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 2:24:08 PM
Affiliation
Area E permit holder F/V Wild Salmon

Phone
907-290-0976
Email
jdmeredi@gmail.com
Address
PO Box 1731
Cordova, Alaska 99574

Support: Proposal #19

I support bringing back the 2017 rules that during low abundance seasons that both down river and up river groups should share the burden. When counter numbers are low and return fish stocks are lower the commercial fleet is closed to fishing. This has never been more apparent that the last several seasons with us lucky if we get one 12 hour opener a week.

I strongly support the Board passing Prop #19



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/14/2021 2:36:04 PM
Affiliation
Area E permit holder F/V Wild Salmon

Phone
907-290-0976
Email
jdmeredi@gmail.com
Address
PO Box 1731
Cordova , Alaska 99574

Proposal #10: SUPPORT

I believe that boats should be used as transportation to unreachable beach and shore areas to dip net. However using a boat with dip net attached to essentially "trawl" up and down stream seems excessive.

I strongly SUPPORT the Board passing Prop #10.



Submitted By
Joseph Meredith F/V Wild Salmon
Submitted On
11/15/2021 11:25:34 AM
Affiliation
Area E permit holder F/V Wild Salmon

Phone
907-290-0976
Email
jdmeredi@gmail.com
Address
PO Box 1731
Cordova, Alaska 99574

Support: Proposal #8

As dip net charters become more popular in Chitina it is becoming more frequent for groups to be dropped off at the confluence of tributaries merging with the Copper River. Passing this proposal would give salmon additional opportunity of reaching these confluences and entering tributary waters for spawning.

I wish the Board would PASS this proposal.



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Wasilla, Alaska, and I participate in the commercial salmon fisheries of the Prince William Sound Region.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region,



especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Julian Reutov
layzee.jr@gmail.com
(907) 299-4523



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I am a commercial fisherman and live in Cordova. I am also a PWSAC board member and fish with my oldest daughter, who is also on the crew. Commercial fishing helps support my family, supports the town of Cordova, offers many jobs between fishing jobs, net repairs, mechanics, parts, hydraulics, etc., and most importantly provides a healthy resource to people all across the world that otherwise wouldn't have access.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.



Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Justin Ryan
Justinryan0307@gmail.com
(907) 831-0905

Submitted By
Keith Dienstl
Submitted On
11/7/2021 7:20:36 AM
Affiliation
Resident



PC128
1 of 1

I STRONGLY OPPOSE PROPOSALS 6, 7, 8, 9,10,11, 12, 13, 14, 15, 16, 17, 18, 19, 20. Access to the Copper River Dipnet Fishery is an inherit right to all Alaskans and should not be limited or restricted in any way!!

I STRONGLY SUPPORT PROPOSAL 18!!

I STRONGLY SUPPORT PROPOSAL 21!!

I STRONGLY SUPPORT PROPOSAL 22!!



Submitted By
Keith Genter
Submitted On
11/9/2021 6:20:13 AM
Affiliation

Phone
9073220572

Email
akkgenter@gmail.com

Address
PO Box 874953
Wasilla, Alaska 99687

I wholeheartedly support and agree with the Chitina Dipnetters Association. Please continue to allow us to harvest our salmon annually. Our needs should be a higher priority than the commercial fishing industry. Thanks in advance for your time and effort, CW4(R) Keith D. Genter



Submitted By
Kelly M. Smith
Submitted On
11/14/2021 8:51:39 PM
Affiliation

Phone
9075754151
Email
akbulldogs@gmail.com

Address
HC60 292D
River Root Farm
Copper Center, Alaska 99573

Proposal 6 -Oppose! Reporting as of now is works fine and requiring 3 day reporting impacts travel plans because of lack of internet access in the area could impact peoples travels plans and will reduce tourism opportunities for local businesses.

Proposal 7 - Strongly Oppose! Banning guide services will prevent access to thousands of users who do not own a boat or do not wish stand on slippery rocks or wade into the fast current to try and catch fish. Properly licensed and vetted Guide services provide safe access to residents who would otherwise be unable to participate.

Proposal 8 - Oppose! Language is too vague and would restrict access to the Personal Use and Subsistence Fishery at the Bridge, O'Brian Creek, Terral Creek, Eskaleta Creek and Haley Creek. All of these drainages are popular access points for users.

Proposal 9 - Oppose! Language is too vague and would restrict access to the Subsistence Fishery at the Bridge.

Proposal 10 - Strongly Oppose! This proposal lacks common sense and would effectively force everyone to Dipnet from the shore leaving dip netter to stand on slippery rocks or wade into the river. This puts users at undo risk.

Proposal 11 - Strongly Oppose! This proposal would like all boaters who navigate their boats into the canyon could only tie off to the canyon walls or shore. As a professional mariner I feel that forcing lay people to navigate their boats into very very sketchy currents is a receipt for disaster and puts undue risk to the fisherman and their passengers.

Proposal 12- Strongly Oppose! There are a few places in the PU fishery that this interaction occurs. There are only a handful of locations to safely Dipnet from a boat in the PU where as there is nearly 20 miles of river bank for people who wish to Dipnet from shore can. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetter who wade into the water in the same drift as boats are putting themselves at risk and present a hazard to navigation. By pushing out 30-40' poles these folks run their nets under the running gear of the boats presenting a possibility of fouling the motor and setting the vessel dead adrift creating a safety hazard for the captain and crew.

Proposal 13 - Strongly Oppose! Fish wheels are stationary hazards that boats avoid. By limiting navigation near fish wheels the proposal could eliminate access to the entire length of the Kotsina flood plain just above the bridge forcing everyone to fish across the river on the West Bank of the Copper. One person's "too close for comfort" is not another's. Data needs to be provided that demonstrates actual accidental contact or fowling of Dipnet gear from a boat with a Fishwheel. The hazard lies with the boat operator who could expect to capsize on contact with a wheel and thus can navigate around this hazard with this knowledge. Whether its a Fishwheel operator who drives a boat to their wheel or a dipentter the boat is only a momentary sound that quickly passes and does not impact fishing success. If it did the Fishwheel operator would not run a boat near their wheel.

Proposal 14 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 15 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar on while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, aerial spotters and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more and aide to navigation than to find fish.

The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal this with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied."

Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer more time take and an additional burden on the user to obtain multiple permits and additional reporting.



Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. Or, busy days this area can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long" there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition though incrementally small adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who what to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.

Proposal 22 - Strongly support!



From: [Ben Mohr](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Haight, Glenn E \(DFG\)](#)
Subject: Withdraw KRSA Proposal 5 (HQ-F20-044)
Date: Monday, October 25, 2021 3:40:08 PM

Good afternoon,

I'm writing today to request that Proposal 5 (HQ-F20-044) for the upcoming Prince William Sound Finfish and Shellfish meeting be withdrawn from consideration by the Board of Fisheries. KRSA no longer wishes to offer this proposal.

Can you please confirm this will be pulled?

Thanks,

Ben Mohr

Executive Director

[Kenai River Sportfishing Association](#)

907.262.8588 office

907.223.7635 mobile



2021-2022 Board Members

Bill Eckhardt, *Chair*
Retired President, AK USA FCU

Jim Brady, *Vice Chair*
President, Brady Investments, LLC

Reuben Hanke, *Vice Chair*
Owner, Harry Gaines Kenai River Fishing

Kevin Branson, *Secretary/Treasurer*
CPA, Thomas, Head & Greisen

Kristin Mellinger, *Vice President*
Owner, V3 Strategic Solutions, LLC

Ross Baxter
Ross Baxter Group, Jack White Realty

Rik Bucy
Retired, Tesoro Northstores

Joe Connors
Owner, Big Sky Charter & Fish Camp

Laura Edmondson
CFO, Bering Straits Native Corp.

Dick Erkeneff
Owner, Kenai River Raven

Ed Fogels
Retired, AK Dept. of Natural Resources

Linda Leary
Owner, Fishewear

Derek Lechlitter
Owner, Legacy Electric

Bill MacKay
Retired, Senior VP, Alaska Airlines

Verne Martell
Retired, Alaska Pasta Company

Eldon Mulder
President, The Mulder Company

Mike Pawlowski
Partner, Strategy North Group

Emeritus

Bob Penney
Chair Emeritus

November 15, 2021

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

RE: Prince William Sound/Upper Copper and Susitna Rivers Finfish and Shellfish

Dear Alaska Board of Fisheries:

The Kenai River Sportfishing Association (KRSA) is a nonpartisan, nonprofit fishery-conservation organization that works to ensure the long-term health and sustainability of fishery resources in the Kenai River, Cook Inlet and elsewhere in Alaska, through advocacy of sport and personal use fisheries and the promotion of science-based fishery management and conservation. In pursuit of this goal, KRSA respectfully submits the following comments regarding proposals under consideration at the upcoming Prince William Sound/Upper Copper and Susitna Rivers Finfish and Shellfish Board of Fisheries meeting.

Proposal 5 – KRSA submitted this proposal. After careful consideration of the new Sustainable Escapement Goal suggested by the Department, KRSA would like to respectfully withdraw this proposal and support the ADFG suggested Sustainable escapement goal of 21,000-31,000 king salmon for the Copper River.

Note: KRSA would like to echo the comments submitted by AK eXpeditions, LLC on Proposals 6-22.

Proposal 6 - Oppose! Reporting as of now is works fine; requiring 3-day reporting impacts travel plans because lack of internet access in the area could impact travel plans and will reduce tourism opportunities for local businesses.

Proposal 7 - Strongly Oppose! Banning guide services will prevent access to thousands of users who do not own a boat or do not wish stand on slippery rocks or wade into the fast current to try and catch fish. Properly licensed and vetted Guide services provide safe access to residents who would otherwise be unable to participate in the fishery.

Proposal 8 - Oppose! Language in this proposal is too vague and would restrict access to the Personal Use and Subsistence Fishery at the Bridge, O'Brian Creek,

Terral Creek, Eskaleta Creek and Haley Creek. All of these drainages are popular access points for users.

Proposal 9 - Oppose! Language in this proposal is too vague and would restrict access to the Subsistence Fishery at the Bridge.

Proposal 10 - Strongly Oppose! This proposal lacks common sense and would effectively force Alaskans to Dipnet from the shore, requiring personal use fishers to stand on slippery rocks or wade into the river. This puts users at undue risk.

Proposal 11 - Strongly Oppose! This proposal would mean all boaters who navigate their boats into the canyon could only tie off to the canyon walls or shore. Forcing Alaska residents to navigate their boats into challenging currents is a recipe for disaster and puts undue risk to the fisherman and their passengers.

Proposal 12- Strongly Oppose! There are few places in the PU fishery that this interaction occurs. There are only a handful of locations to safely Dipnet from a boat in the PU, while there are nearly 20 miles of riverbank for people who wish to Dipnet from shore. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetters who wade into the water in the same drift as boats are putting themselves at risk and present a hazard to navigation. By pushing out 30-40' poles these folks run their nets under the running gear of the boats presenting a possibility of fouling the motor and setting the vessel dead adrift creating a safety hazard for the captain and crew.

Proposal 13 - Strongly Oppose! Fish wheels are stationary hazards that boats avoid. By limiting navigation near fish wheels the proposal could eliminate access to the entire length of the Kotsina flood plain just above the bridge, forcing all other users to fish across the river on the West Bank of the Copper. One person's "too close for comfort" is not another's. Data need to be provided that demonstrate actual accidental contact or fowling of Dipnet gear from a boat with a Fishwheel. The hazard lies with the boat operator who could expect to capsize on contact with a wheel, and will necessarily navigate around these hazards. Whether it's a Fishwheel operator who drives a boat to their wheel or a dipentter, motors are momentary sounds which pass quickly and do not impact fishing success.

Proposal 14 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 15 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar on while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, while many others also utilize aerial spotters and other means effectively to navigate and to locate fish.

However, unlike our commercial counterparts, using sonar on the Copper River is used more as an aide to navigation than to find fish.

The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or unseen structures without the use of sonar. “Drifts” as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal this with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated: “while it is rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied.”

Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer, more efficient method of take and an additional burden on the user to obtain multiple permits and additional reporting.

Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. On busy days this area can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition, though incrementally small, adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who want to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late, so opening the season earlier would make little difference as the fishing pressure would be low, as would the success rates.

Proposal 22 - Support!

Proposals 49-55 KRSA has long and vocally supported halting increases in hatchery production of pink salmon from Prince William Sound hatcheries until such time as issues surrounding straying and competition with other species and stocks of salmon, particularly king salmon, that inhabit



the North Gulf Coast of Alaska are further clarified. To the extent that one or all of these proposals serves as a vehicle to the objectives that we have advocated KRSA support that effort.

Sincerely,

A handwritten signature in black ink that reads "Ben Mohr".

Ben Mohr
Executive Director



Submitted By
kenneth Renner
Submitted On
11/15/2021 4:55:47 PM
Affiliation

Phone
907 9036184

Email
utopia_renner1@hotmail.com

Address
305 Observation Avenue, Cordova, AK, USA
PO Box 6
Cordova, Alaska 99574

Formal On-Time Public Comment to the Alaska Board of Fisheries

Prince William Sound Finfish 2021/2022

PROPOSAL 5: OPPOSE

PROPOSAL 6: SUPPORT I support timely reporting for all users of Copper River Salmon. PROPOSAL 8: SUPPORT I support the prohibition of dipnet harvest at river confluences in the Upper Copper River.

PROPOSALS 9-11: SUPPORT I support restrictions on dipnet harvest from boats in the Upper Copper River.

PROPOSAL 14-15: SUPPORT I support the restricting the use of monofilament gillnet webbing in dipnets until after August 15.

PROPOSAL 16: SUPPORT I support the prohibition of the use of sonar to target fish holding in the Copper River while dipnetting.

PROPOSAL 18: OPPOSE

PROPOSAL 19: SUPPORT

PROPOSAL 21: OPPOSE

PROPOSAL 38: SUPPORT

PROPOSAL 40: SUPPORT

PROPOSAL 41: SUPPORT

PROPOSALS 61-67: SUPPORT I support the addition of sustainable winter and shoulder season fisheries opportunities such as sea cucumber and crab.



To: Alaska Board of Fisheries

11/5/2021

From: Kenneth Roberson
1284 Rainbow Lane
Fernley, Nevada 89408

E-mail: owlkrvr@sbcglobal.net

Attn: Board Members

My name is Kenneth Roberson, I was employed by ADF&G for 25 ½ years (from 1968 to 1993) with nearly 24 of those years in Glennallen, AK. During those years, I was with the Commercial Fish Div. most of the time, jointly with Habitat Div. during Pipeline Construction and lastly with the FRED (Fisheries Rehabilitation, Enhancement and Development Div. For 20 plus of those years I was responsible for the management of the Personal Use and Subsistence Fisheries on the Upper Copper River. I conceived of and supervised the development of Gulkana Hatchery starting with 200,000 eggs in 1973 and by the 1980's a capacity of 35+ million eggs which generated a return in the neighborhood of 300,000 sockeye. I started the hatchery as a research project with the goal of replacing some of the spawning area lost due to flooding and later highway realignment (Rehabilitation) and eventually we achieved (Enhancement) levels of production. **All of my comments relate to my concern for the Gulkana Hatchery and the lack of achieving adequate eggs takes in recent years (only 12 million eggs in 2021).**

I started work in Alaska in 1961 (1961 to 1968) working for the Fisheries Research Institute with the University of Washington on the Wood River Lakes north of Dillingham, in Western Alaska.

In 1993, the State of Alaska turned most of the ADF&G hatcheries over to the Private Non-Profits thus ending my position as Hatchery Manager. I chose to stay in Glennallen and retire rather than take another position elsewhere. Several years after retiring, I was asked to join the Board of Prince William Sound Aquaculture Corp. due to my experience with Gulkana Hatchery. **I am currently on the Board of PWSAC; however, my comments are my own and I do not represent PWSAC in any way at this time.**

I currently live in Nevada but I maintain a careful watch on all aspects of the Copper River salmon issues plus being a PWSAC Board Member.

Proposal Comments:

Proposal #6 – Require in-season catch reporting – **Favor this proposal** – **Currently**, catch reports dribble in for months after the salmon are taken, thus there is no information on the actual harvest levels in-season. The current Management Plan indicates the salmon may take two weeks to ascend the river to the Chitina area while “in fact” it can take up to six weeks for that effort. Management of the “Upriver” fisheries can not be based solely on the Sonar counts, it must also take into account the river level, catch reporting and also current genetic sampling conducted by ADF&G. The Regulation 5 AAC 01.616 (b)(1)(A)(B)and (C) set allocations for three areas of the Upper Copper River District and yet catch reports are not due until October 31, thus there is no in-season management of the catch.



Under 5 AAC 39.222, the Board has the responsibility to: **Manage Sustainable Salmon Fisheries** which includes sections (a), (b), (c)(1)(A)(i-v),(B-G), (2)(A-H), (3)(A-C). The essence of this is that the Gulkana River has had poor to very poor escapements since the flood event of 2013. Similar events took place in 1964 and 1971 moving masses of sand, gravel and boulders out of the river reach between Summit Lake and the Denali Highway bridge, an area that includes the Gulkana Hatchery. Escapement survey data collection has been impaired by budget and time constraints since 1992 when I was last responsible for that activity thus the deterioration of the escapements to the Gulkana River in general and specifically Gulkana Hatchery have not been given appropriate attention. In particular, the egg takes at Gulkana Hatchery have gone down significantly over the past 5 years with the 2021 egg take only 12 million eggs of the 35 million egg take goal. Natural spawning in the adjacent stretch of river did no better. My plan in 1973 when I started the hatchery project was to replace spawning production lost due to the 1964 and 1971 flooding and the encroachment of the Richardson Highway rebuild that increased the river speed and reduced the channel width of the river. We were highly successful until the 2013 flooding event. **There needs to be a significant increase in escapement evaluation and added protection to the Gulkana River in order to regain it's normal significant contribution to the overall Copper River salmon production.**

Proposal #7 – Prohibit guiding in the Subsistence Finfish fishery – **Favor** – Seems contrary to the intent of a subsistence fishery to allow guiding.

Proposals #8, #9, #10, #11, #12 and #13 – **Favor the intent of all these proposals** – The use of moving boats to dip net from is a relatively new innovation; however it is neither **cultural** or **traditional** in any sense of the words by definition whether by dictionary or Alaskan legal terms. It was well after 1969 before any boats were operating in the Chitina area and later that guides began operating almost entirely down into Wood Canyon. Dipnetting from a boat constitutes a “new and illegal” fishing technique. It constitutes “trawling” with a dipnet, a technique not defined in Subsistence or Personal Use regulations thus for reasons stated below, should be prohibited. In 5 AAC 39.016 (d) (10)(Commercial Salmon Regulations), a trawl is a bag shaped net towed through the water to capture fish or shellfish. **It's time to put an end to this illegal method !**

A moving boat with one (or more) dip nets can reach every single resting, holding or concentration area in all of both the Chitina and Glennallen Subdistricts. Every eddy, creek mouth or any other place where the fish are concentrated and resting become “target areas”. In the Commercial Fishing areas, these operations are called “creek robbers” and of course illegal. Obviously, the technique is highly effective and potentially damaging to smaller stocks. With it being so easy to capture large numbers of fish very quickly, it's almost an incentive to take more. It has become a rich man's sport rather than a subsistence and personal use fishery. Put an end to dip netting from boats !

Proposals #14 & #15 – Prohibit gill net mesh in dip nets – **Favor** – If any large mesh is used, the salmon, other species and especially Steelhead can be injured and possibly die before release whereas standard netting will prevent this problem.

Proposal #16 – Prohibit the use of fish finders – **Favor** – It seems that a few persons with expensive boats and equipment are impacting places where the salmon rest thus not taking a few from each group of salmon as the migrate up the river. This is especially onerous when boat



operated nets can target the various stream and river mouths plus other places with eddies that the salmon rest in. They salmon have no place to hide and rest. Eliminating dip netting from boats is preferable (See notes on all the dipnetting from boats proposals). **Again, this method is neither cultural or traditional in this fishery.**

Proposal #17 – Establish bag limits for fishing from a boat in Glennallen Subdistrict – **Favor** – Better than nothing but eliminating dip netting from boats is far preferable (See notes on all the dipnetting from boats proposals)

Proposal #18 – Extend lower limit of Chitina Subdistrict – **Strongly oppose** this proposal for two reasons:
#1 – The area includes Haley Cr. and Canyon Cr. where salmon (especially sockeye) school and rest before ascending Wood Canyon especially during periods of high flow. There are also additional areas where the salmon rest and would be easy targets for boats with dipnets. Allowing dipnetting (especially from boats) would eliminate the few resting areas available to salmon. Also see my comments on all the dipnetting from boats proposals !

#2 – The area described by the proponents is where a number of years ago; illegally in the area, a boat with three men and a boy, tied on to a tree in the channel trying to pull it out, had the boat swamped with two of the men drowning and only the boy's life jacket saving him and his father. The area is extremely dangerous and should never be opened for safety reasons.

Proposal #19 – If commercial catch 50% below 10 year average by June 1, Chitina Subdistrict catch reduced to 50,00 salmon. **Agree with concept but becomes an allocation and management issue** – See my comments on Proposal #6 which becomes a necessity to perform this action. Need more flexible overall in-season management of the Personal Use and Subsistence fisheries.

Proposal #20 – Reduce bag limits to historical levels in Chitina Subdistrict – This is an allocation issue which proper in-season management should take care of. I personally find the bag limits excessive and subject to abuse and wastage.

Proposal #21 – Change Personal Use open date back to June 1. – **Oppose** - The date was adjusted to protect king salmon and should be retained for that reason.

Proposals #22 and #23 – Remove C&T finding for fish other than salmon and Remove C&T finding for Rainbow/Steelhead – **Oppose** – There is no reason for this change ! Steelhead in particular are present in very limited numbers and need all available protection.

Proposals #24, #25 and #30 are ADF&G proposals - Agree (Favor) each of them.

Proposal #31 – Increase sockeye salmon sport fishing possession limit – **Oppose** this proposal since it would add pressure to the stocks in the Gulkana River that are already seriously stressed and not achieving adequate escapements.



Submitted By
Kevin Masterson
Submitted On
11/7/2021 10:26:26 AM
Affiliation
None

Phone
9076220611
Email
contactkevinhere@yahoo.com
Address
10750 Sarah Barton Cir
Eagle River, Alaska 99577

Proposal 7 – Strongly Oppose. This is the only way some people can access this fishery.

Proposal 8 – Oppose. This is a subsistence fishery, of course the limit will be higher than a sport fishery.

Proposal 9 – Strongly Oppose. Again, this is the only way some people can access this fishery.

Proposal 10 – Strongly Oppose. Again, this is the only way some people can access this fishery.

Proposal 11 – Oppose.

Proposal 12 – Strongly Oppose. There is a huge difference between a person, mostly stationary on the shore and a boat floating by. Most boat operators try to avoid shore dip netters any way, making this a non-issue.

Proposal 13 – Strongly Oppose. There is plenty of room for everyone on the river. 75 feet is excessive.

Proposal 14 – Strongly Oppose. Based on a false premise. In most cases, the fish are not in the dipnet long enough to harm them.

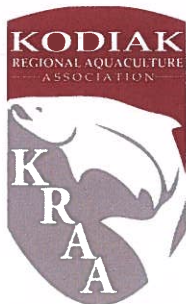
Proposal 15 – Strongly Oppose. again, Based on a false premise. In most cases, the fish are not in the dipnet long enough to harm them.

Proposal 16 – Strongly Oppose. Depth finders also serve a safety function to help from running aground or into submerged object which can damage boat.

Proposal 17 – Strongly Oppose. This is a subsistence fishery. If the dipnet limit is capped at a lower limit, will the fishwheel limit also be capped at the same lower limit?

Proposal 19 – Strongly Oppose. There is a recognized difference between a commercial fishery and a subsistence fishery. Just because the commercial fishers are not getting rich, doesn't mean subsistence users should go hungry.

Proposal 20 – Strongly Oppose. Again this is a subsistence fishery, if you are worried about escapement, why not limit the commercial fishery?



KODIAK REGIONAL AQUACULTURE ASSO

104 Center Avenue
Kodial

Phone: 907-486-6555

Fax: 907-486-4105

www.kraa.org

To: Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

November 15, 2021

RE: Prince William Sound Finfish and Shellfish, November 30-December 6, 2021
Opposition to Proposals 49, 50, 51, 52, 53, 54 and 55

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) respectfully requests that the Alaska Board of Fisheries reject Proposals 49-55 at the upcoming Prince William Sound/Upper Copper and Upper Susitna Finfish and Shellfish meeting in Cordova. As a whole, Proposals 49-53 lack coherence, detail, offer inappropriate regulatory structures, and would impose costly research and monitoring/assessment efforts on the Department. Proposals 54 and 55 provide no evidentiary support or basis for the desired hatchery production reductions and lack specificity such that adoption of Proposal 55, in particular, would likely affect all hatchery programs in the state of Alaska, not just those in Prince William Sound.

The Board will remember that it's been nearly four years since the current targeting of hatchery programs began at the February, 2018 Sitka Board of Fisheries meeting. In that time, hatchery issues have been before the Board at almost every meeting. The Board, the Department, hatchery operators, and the public have repeatedly been treated to various iterations of claims and proposals similar to what you will review at the upcoming meeting. At each turn, a great deal of time and resources—human and financial—has been required to respond. The Board has, on each occasion, rightly rejected this systematic effort to malign Alaska's hatchery programs and their underlying science, management, and oversight by ADF&G.

New Board members may not recognize the redundancy of proposals 49-55. To illustrate this redundancy for the Board, I have included with this document a selection of KRAA's comments on these same topics from previous meetings. KRAA has submitted over 30 pages of similar comment to the Board over the past four years. KRAA's comments are a fractional representation of the time and effort demanded of those who have been forced to respond to repetitive proposals and to defend the Alaska Hatchery Programs.



In addition to KRAA's comments, I would draw your attention to the information and documents presented during the October, 2018 Board of Fisheries Work Session, and one document in particular, specifically related to claims in proposals 49-53:

Special Publication No. 18-12; Salmon Hatcheries in Alaska—A Review of the Implementation of Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks. (Evenson, et.al, accessible through the Alaska Board of Fisheries website.)

As a whole, Proposals 49-53, without acknowledging the source, take language from the Policy of Management of Sustainable Salmon Fisheries and the State's genetics policy in an attempt to create regulations out of the State's current hatchery policies.

- **Proposal 49** targets the Prince William Sound Management and Salmon Enhancement Allocation Plan which is gear-group driven and would likely introduce unintended constraints on managers which could make it impossible obtain the allocation guidelines of the plan.
- **Proposals 50-53** target regulations specific to the Special Harvest Areas of individual pink salmon hatcheries in Prince William Sound
 - The current regulations are necessary to provide for the definition and extent of the Special Harvest Areas (SHAs) and apply to management actions necessary to provide broodstock collection, escapement and hatchery harvest.
 - The current regulations apply only to the SHAs and hatchery operations and as such have no application for management outside of the designated area as defined (unless temporarily expanded by EO).
 - One of the most disturbing elements of Proposals 49-53 is that "acceptable levels of straying" is undefined. The Board should avoid decision making without full consideration of the best available science regarding straying. KRAA believes the Board does not have adequate information to determine what straying percentages to fill in for the proposal's XXX regarding "acceptable levels" of straying.
 - As a fallback- the author suggests a hard 2% stray rate as the acceptable limit. The 2% figure is not well-supported by the scientific literature which contains a wide degree of variability in the assessment of natural stray rates in all species of salmon.
 - The scope of the straying assessment that would be required as a result of adoption of these proposals would be prohibitively costly to conduct on an annual basis.
 - The author paints all programs with the same brush and demonstrates limited understanding of the programs in question. For example, the Solomon Gulch Hatchery does not conduct remote release projects for pink and chum salmon—the species for which the author seems to have the greatest concern.)



- These proposals all assume that harm is occurring from the straying of hatchery produced salmon. However, much of the information gathered to date indicates that the hatchery programs have had little impact on wild stocks.
- Nevertheless, the ground-breaking work of the Alaska Hatchery Research project continues to address the straying issue and the Board should wait for the results of the study to be finalized before making decisions about the “acceptable level of straying”.
- Regarding Straying in Prince William Sound: 1) The overwhelming majority of returning enhanced salmon are harvested IN Prince William Sound, indicating a successful management strategy; 2) After more than four decades of pink salmon enhancement in Prince William Sound, genetic stock structure is still very evident for wild stocks—even those in proximity to hatcheries. and 3) during the 40 years of hatchery pink salmon production in Prince William sound, some of the largest wild stock returns on record have taken place—a number of those in the last decade.
- **Proposal 54** targets the Prince William Sound Management and Salmon Enhancement Allocation Plan
 - The Salmon Enhancement Allocation Plan is an allocation of enhanced salmon among gear groups and the proposal to limit production is outside the scope of the plan.
 - The proposal addresses incredibly complex issues regarding ocean carrying capacity for salmon. The proposer makes a host of assumptions from limited scientific data to conclude that the Board should find a need to limit hatchery production. Such a decision would not be based on the best available scientific information.
 - This proposal, if adopted, would likely make the Prince William Sound Hatchery programs unsustainable.
 - Large reductions in hatchery releases substantially change the economics for hatchery operations. Hatchery closures would be a net loss for Alaska’s salmon fishermen and the Alaska economy with no clear benefit to wild stocks.
- **Proposal 55** effectively targets all existing hatcheries in the State of Alaska and seeks to reduce the permitted capacity of all hatcheries for all species by 25% from the level to which those facilities were permitted in the year 2000.
 - This proposal was presented as an ACR in 2018 and was rejected for consideration by the Board at that time.
 - There appears to be no record of the “alleged” agreement. Such an agreement is not known to hatchery operators or the Alaska Department of Fish and Game.



- As mentioned in comments to proposal 54, there is very little rationale, scientific or otherwise, provided by the proposer to support the Board's reduction in permitted capacity.
- The proposal is presented as a new section of regulation under 5 AAC 40.1XX which begins with Article 3, Applicability of Regulations. These regulations apply generally to the process for issuance of a new hatchery permit.
- All hatchery permits receive in-depth review by the Department prior to issuance. The process takes years, thorough investigation and vetting, and detailed, scientific examination of the size of the project to be permitted.
- Again, should the Board adopt proposal 55, there would be widespread economic impacts to the communities and region. In many cases, the reductions in permitted capacity would compromise the associations' ability to meet debt service requirements to the State through the Fisheries Enhancement Loan Program.
- For illustration, I have included a summary of the probable impacts on KRAA's programs from the adoption of proposal 55.

In summary, KRAA asks that you please reject proposals 49, 50, 51, 52, 53, 54, and 55. Individually they have little merit or basis for adoption by the Board, and collectively they would do great harm to the viability of Alaska's salmon fisheries and coastal communities.

Thank you for the opportunity to submit these comments.

A handwritten signature in blue ink that reads "Tina Fairbanks".

Tina Fairbanks
Executive Director



Kodiak Regional Aquaculture Association

Impacts, Proposal 55, as submitted by Virgil Umphenour

Proposal 55: Amend private-non-profit hatchery permits to decrease allowable hatchery production as follows: The Board of Fisheries would hold the private-non-profit (PNP) hatchery production to the 2000 level and decrease it to 25% of that level.

This information was initially prepared in response to an identical 2018 ACR which was considered and rejected during the October, 2018 Work Session. The impacts remain the same but have been updated to reflect preliminary local ex-vessel values paid in 2020/2021.

HISTORY/MERITS

- The 2018 ACR claimed there was agreement to reduce hatchery production by 25% in February of 2001; however there appears to be no official record of a decision or direction to reduce or cap production.
- This proposal if accepted or implemented is likely to have unintended negative consequences. As written, the proposal applies to all facilities in the State as well as all species and would likely have the greatest impacts on KRAA projects designed to have direct benefits to sport and subsistence users.

SPORT AND SUBSISTENC IMPACTS

- KRAA's Subsistence and Sportfish production is provided at no cost to users. All costs are subsidized through Salmon Enhancement Tax collected from commercial salmon permit holders and through cost recovery activities.
- Programs impacted:
 - Crescent Lake sockeye and coho stocking projects (subsistence and sport) with direct benefit to the village of Port Lions would likely cease—unsupportable with reduced production.
 - Ouzinkie Sockeye saltwater net pen sockeye release and Katmai Lake coho stocking projects (subsistence and sport) would likely cease—not permitted in 2000.
 - Telrod Cove sockeye saltwater net pens with benefit to Westside fisheries and the Village of Larsen Bay (subsistence and commercial) would cease—not permitted in 2000.
 - King salmon production (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable with other program losses. First permitted 2000 may not qualify for continuation.
 - Coho Salmon Production, Kodiak Road system (sportfish)—loss of production, not permitted in 2000.
 - Rainbow Trout (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable.
 - Kitoi Bay hatchery coho (sport and commercial benefit)—likely 45% reduction in returns.
 - Kitoi Bay Hatchery Sockeye production (subsistence and commercial)—reduction in production, potential loss of program.

COMMERCIAL IMPACTS

- Impacts to production of pink, chum, and sockeye salmon: Overall potential loss of \$5-6 million annually in ex-vessel value.



- Pink salmon releases would decrease by over 35%, and, on average, the fishery would lose nearly 3 million fish on an annual basis.
- At 2020/2021 prices, that would constitute a potential **loss of approximately \$4 million in ex-vessel value** to the common property fishery annually.
- Chum salmon releases would decrease by over 30%, and, on average, the fishery would lose as many as 200,000 fish on an annual basis.
- At preliminary 2021 prices, that would constitute a potential **loss of as much as \$960, 000 in ex-vessel value** to the common property fishery annually.
- Reductions in sockeye salmon production at Kitoi Bay and Pillar Creek Hatcheries would result in potential loss of over 150,000 adult sockeye salmon per year.
- At preliminary 2021 prices, that would constitute a potential **loss of over \$1 million in ex-vessel value** to the common property fishery annually.
- In 2018 and 2020, and in the face of poor wild stock forecasts, KRAA conducted NO pink salmon cost recovery in order to allow for a viable commercial salmon fishery for Kodiak commercial salmon permit holders.
- In those two years, KRAA contributed over 50% and over 20% respectively.
- In 2021, KRAA contributed approximately 40% of the overall pink salmon harvest in Kodiak in a year with a relatively low odd-year wild stock return.
- KRAA's contribution to the commercial fisheries in Kodiak typically represents a smaller proportion of the overall fishery; however, as evidenced by the above recent figures, these programs can greatly impact viability of the commercial fisheries of the Kodiak Region when wild stocks do not support a robust fishery. That's why we are here. That's how we fulfill our role in our community and our obligation to the commercial salmon permit holders who support and fund our programs.

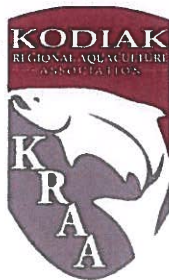
ECONOMIC/ORGANIZATONAL IMPACTS

- Enhancement provides stability and opportunity to the fishery; Supports reliable processing capacity and processing sector jobs as well as other support industries
- Generates added income for municipalities and local governments through landing tax on enhanced harvest
- Direct and indirect employment: KRAA employs 40-45 individuals per year with total payroll in excess of \$1.8 million annually. This likely equates to down-stream effects on over 400 local jobs.
- Reductions in production would likely mean loss of 8-12 positions (5 year-round, 3-7 seasonal positions) for KRAA
- Reduced production would decrease cost-benefit of programs. Many may become unsupportable.
- KRAA spends over \$1 million annually with local vendors and Alaskan companies
- Even with organizational cuts and efficiencies, cost recovery activities would consume a greater proportion of the returns and benefit to users.
- Debt Service: KRAA currently has FERLF loans totaling \$2.25 million. The association's ability to meet that obligation would likewise be compromised.



Supplementary comments by KRAA

- 1) July 7, 2018 comments to oppose the Emergency Petition to revoke the Valdez Fishery Development Association (VFDA) PAR for a 20 million egg increase.
- 2) October 3, 2018 to oppose ACRs 1 (prohibit VFDA incubation, rearing and release of increased eggtake capacity) and 2 (Cap statewide hatchery production at 75% of year 2000 levels) by Kenai River Sportfishing Association and Virgil Umphenour respectively.
- 3) October 8, 2019 in opposition of ACR 2 related to Northern Southeast Regional Aquaculture Associations chum remote release project in West Crawfish Inlet.



KODIAK REGIONAL AQUACULTURE ASSO

104 Center Avenue
KodialPhone: 907-486-6555
Fax: 907-486-4105
www.kraa.orgAlaska Department of Fish & Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

July 7, 2018

Chairman Jensen and members of the Board of Fish,

This letter is in response to the emergency petition to halt the implementation of a PAR for increased pink salmon production at Valdez Fisheries Development Association's (VFDA) Solomon Gulch Hatchery. **I would like to encourage you to take no action on the request of the signatories on this petition to rescind the PAR awarded to VFDA.** The current petition attempts to subvert the established hatchery permitting process and cycle and brings to bear as evidence alarmist references to a list of scientific articles. Additionally, it runs counter to good public policy to hold an emergency meeting mid-summer, when those most likely to be affected by any decision have limited ability to participate in the public process.

At the outset it is important to realize there is a fact-based, scientific counter-narrative to the one that has recently been presented to you in public and written comment and in the media. Armed with the knowledge that there is a supportive base of information for the approved increase at VFDA, and the fact that essentially the same petition has already been submitted and rejected as not constituting an emergency within weeks of the current petition, the Board must reject this petition and proceed with the objective of gaining greater knowledge of the Alaska Hatchery Program as scheduled at the October work session.

Closer examination of the list of articles provided by the petitioners has demonstrated two basic findings: 1) much of the information that is highlighted by the petition signatories is neither new, nor unexpected, demonstrates no clear threat to the resource, and overall does not meet the stipulated criteria for an emergency; and 2) the petitioners rely on list of titles that they would have you believe condemn hatchery production and practice, but they themselves make no effort to demonstrate where these articles provide such conclusive evidence. Examination of the list of articles reveals that certain of these papers contain serious flaws and unsupported conclusions. In these instances, the articles often rely on weak correlations with low statistical significance which do little to support the authors' suppositions and conveniently ignore other factors that have been investigated as drivers of population dynamics and marine survival.

Despite the contention of the petitioners that the modest increase in production at VFDA's Solomon Gulch Hatchery presents an emergency, the information provided neither supports the assertion nor meets the Board's criteria for an emergency. Recent claims that hatchery production, and pink salmon production in particular, has been greatly on the rise for over two decades are not supported through the data. Following the increased production of the early 1990s, hatchery production in the State of Alaska and in the North Pacific has been relatively stable over the last 2.5 decades (Figures 1-3). The North Pacific Anadromous Fish commission tracks hatchery production and provides extensive information related to number and species. You can see (Figure 1) that US hatchery production represents only about 20% of the whole and has remained stable for an extended period. No distinction is made here to separate Alaska Hatchery production from that of Oregon, Washington, California, and Idaho.

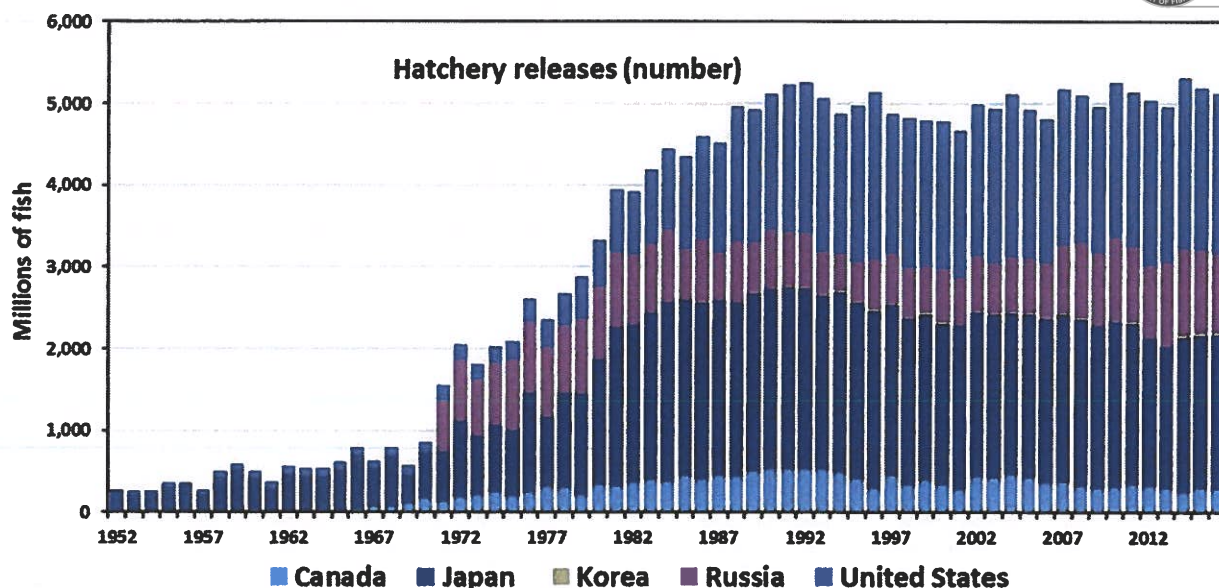


Figure 1. Hatchery releases, 1952-2016, Source: North Pacific Anadromous Fish Commission (NPAFC). 2017. NPAFC Pacific salmonid hatchery release statistics (updated 31 July 2017). North Pacific Anadromous Fish Commission, Vancouver. Accessed Month, Year. Available: www.npafc.org.

Of the hatchery releases to the North Pacific, Pink salmon appear to represent around 25% of the total hatchery releases (Figure 2). In Alaska, pink salmon represented just over half (53.8%, 894 million) of the overall hatchery releases in 2016 (ADF&G Alaska Salmon Fisheries Enhancement Annual Report, 2017, RIR No. 5J18-02), and in the context of overall hatchery production in the North Pacific, this represents approximately 18.8% of all hatchery releases to the North Pacific. Again, this figure further

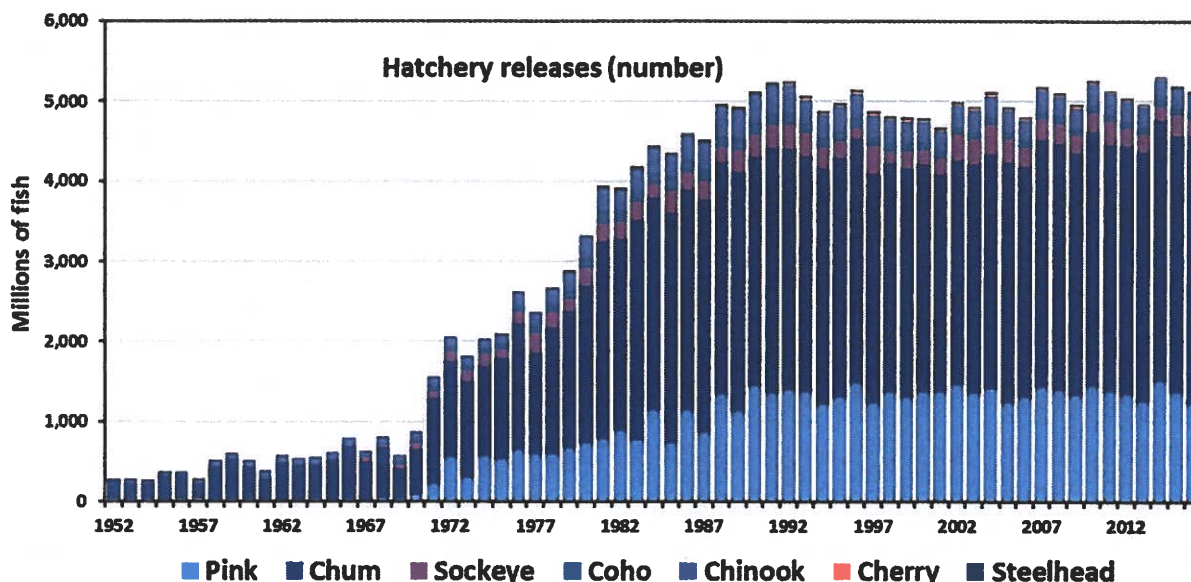


Figure 3. Hatchery Releases by Species, 1952-2016; Source: North Pacific Anadromous Fish Commission (NPAFC). 2017. NPAFC Pacific salmonid hatchery release statistics (updated 31 July 2017). North Pacific Anadromous Fish Commission, Vancouver. Accessed Month, Year. Available: www.npafc.org.



demonstrates the consistent trend in hatchery production over the last 2.5 decades. This trend of steady production has persisted and echoes a period of record high salmon abundance (hatchery and naturally produced) in the North Pacific as a whole. That there have been variable trends over time for various species in terms of body size, size at age, marine survival, abundance, etc. throughout this period of sustained high abundance is fair evidence that the relative constant of hatchery production is not the primary driver of those trends.

For Alaska taken alone and factoring in variability in survival at various life stages, Alaska Hatchery production for all species again reflects this relatively stable trend in production since the early 1990s (Figure 3).

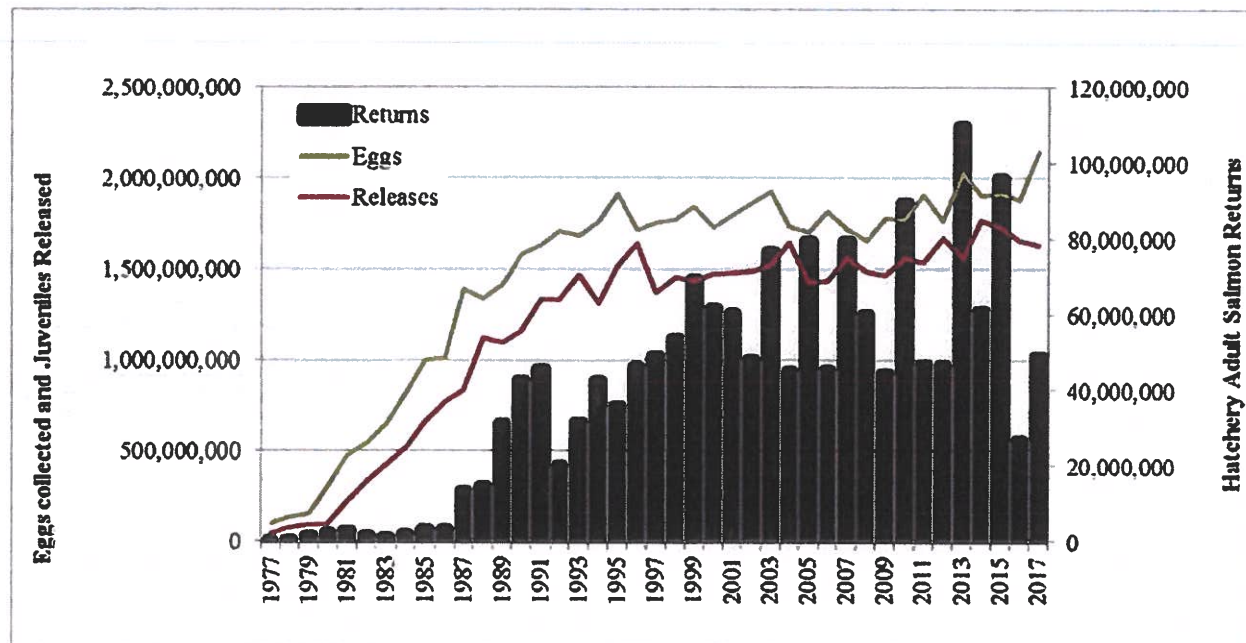


Figure 3. Total salmon eggs collected, juveniles released and adult return for Alaska salmon hatchery programs, 1977-2017; ADF&G Alaska Salmon Fisheries Enhancement Annual Report, 2017, RIR No. 5J18-02

Certainly, an increase in production of 20 million seems quite large, but taken in the context of the above figures, consider this: hatchery pink salmon from all countries make up approximately 15% of the pink salmon biomass in the North Pacific (Ruggerone, 2018). The increase in that percentage by the addition of the resultant juveniles (estimated at 18 million) from the approved PAR for VFDA represents a fraction of a percent. Through other lenses, this increase represents less than a 10% increase in the facility's production, less than a 3% increase in releases to the Prince William Sound, approximately 2% increase in the total pink salmon releases from Alaska Hatcheries, and as little as 0.1% of the pink salmon biomass in the North Pacific.

Further claims against hatchery production, such as those by the petitioners, imply that increases in hatchery pink salmon production threaten to upset the balance in ocean carrying capacity. The list of articles supplied by the petitioners does not establish with any credibility that the approved increase at VFDA constitutes an emergency by this means. The articles contain no conclusive evidence to confirm that a 2% increase Alaska hatchery pink salmon releases will have a negative impact on Alaska fishery resources now or in the future. For more detailed information please reference "Scientific Analysis &



Review of Journal Articles Submitted by Petitioners KRSA et.al.” Submitted by Alaska PNP Aquaculture Associations” as included with the written comment submitted by VFDA in relation to the emergency petition.

In an effort to support their claims, the petitioners provide numerous statements on hatchery production and regulation but make no statement as to how the approved PAR has not met the established process or policies (Factors 1-6 of the emergency petition). Subsequently, they make two contentions, one related to hatchery pink salmon presence (straying) observed in Lower Cook Inlet Streams in 2017 and another related ocean carrying capacity in relation to hatchery pink salmon production. In response to these contentions:

On Straying:

- 1) Straying of pink salmon an acknowledged consideration in the development of the Alaska Hatchery Program and is inherent to all salmon species—pink salmon especially. Discussion and investigation of hatchery straying is an ongoing part of the programs.
- 2) An understanding of the distinctions between stray rates and hatchery fractions is important to understanding both the hatchery otolith marks recovered in LCI in 2017 and the Hatchery-Wild Interaction study. Without that understanding, the LCI information has little relevance.
- 3) The collection of hatchery-marked otoliths collected by ADF&G in Lower Cook Inlet streams was conducted as a result of opportunistic sampling events in 2017. The sampling conducted was not a formal straying study structured to conduct representative sampling of a statistically significant portion of the returning population throughout the spawning period. The percentages indicated are not representative of stray rate or even hatchery fraction present in the overall escapement for 2017.
- 4) Furthermore, there is documented assessment of overall stray rates in the Prince William Sound for the initial years of the Hatchery-Wild Interaction study (2013-2015). This is the best science available in relation to potential straying trends associated with pink salmon stocks in the Prince William Sound.
- 5) Finally, an important factor in the approval of this par is the notable temporal separation between the early pink stock used by VFDA and other PWS stocks. This type of separation in run and spawn timing mitigates concerns related to straying. The local derivation of the early SGH stock as well as the existing temporal separation in the hatchery bloodstock made it ideal for hatchery use.

On Ocean Carrying Capacity:

- 1) A number of the scientific articles offered as evidence by the petitioners contain weak if not unsupported correlations and conclusions while others, though sound science, don't carry the dire implications the authors of the petition imply. For example:
- 2) Ruggione and Irvine, 2018, "Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean, 1925-2015"
 - a. This article indicates that 1990-2015 has been a sustained period of high salmon abundance of all species; pink salmon abundance has been more variable than other species and thus unlikely to be driving abundance of other species; and
 - b. The fact that hatchery pink salmon represent only 15% of the total pink salmon biomass in the North Pacific supports that pink salmon likely have only a low-to moderate impact on the food web.
 - c. This information, pulled from a single article provided by the petitioners is further indication that the petitioners' claims are sensational rather than substantial and should be discounted until such a time that the Board has gained better understanding of the hatchery programs and hatchery science. In the meantime established practice and process should stand.



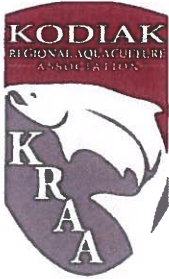
- 3) There are many potential drivers of ocean carrying capacity, marine survival, size at age, etc. such as climate regimes or climate events, sea surface temperature, increased marine mammal populations & etc. The following are two such examples of investigations that look at other drivers of abundance and survival of Chinook salmon:
- a. Siegel, J.E. M.V. McPhee and M.D. Adkison (2017) "Evidence that Marine Temperatures influence growth and Maturation of Western Alaska Chinook Salmon, Marine and Coastal Fisheries Dynamics, management, and Ecosystem Science 9:441-456, 2017."
 - b. Chasco, B.E. et.al (2017) "Competing tradeoffs between increasing marine mammal predation and fisheries harvest of Chinook salmon. Scientific Reports 1, Article number: 15439 (2017)."

Hatchery Operators from across the state are looking forward opportunity increase the knowledge and awareness of Alaska Hatchery programs and the foundational scientific principles with which they were conceived. The Board has scheduled time during the October 2018 work session to begin to better familiarize itself with the Alaska Hatchery programs and should not consider taking action in limiting or altering approved Hatchery permitting without greater knowledge of the programs and the science that supports them.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Fairbanks".

Tina Fairbanks
Executive Director
Kodiak Regional Aquaculture Association



KODIAK REGIONAL AQUACULTURE ASSO

104 Center Avenue
Kodiak



Phone: 907-486-6555
Fax: 907-486-4105
www.kraa.org

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

October 3, 2018

TO: Members of the Alaska Board of Fisheries

RE: ACR 1, ACR2, Alaska Salmon Hatcheries Forum

Thank you for the opportunity to provide comment related to Alaska Salmon Hatchery production and the ACRs submitted for consideration at this October, 2018 work session. Kodiak Regional Aquaculture Association is opposed to ACR 1 submitted by Kenai River Sportfishing Association (KRSA) and ACR 2 submitted by Virgil Umphenour. In the simplest context, both requests fail to meet criteria established for ACR consideration and should not be entertained by the Board for discussion or action in future meetings. More specifically, contentions made by the proposers are weak against the broad body of evidence that can be brought to bear in support of established programs, permitting, and production levels.

As an association actively engaged in the practice of salmon enhancement and research, KRAA would also like to thank the Board for its renewed interest in the *Alaska Board of Fisheries and Alaska Department of Fish & Game Joint Protocol on Salmon Enhancement #2002-FB-215*. We feel that the years in which this protocol was not observed have led to a lack of knowledge and uncertainty in the science and principles that support Alaska Salmon Hatchery production. Renewed adherence to this protocol provides opportunity to become familiar with the science, research, and regulatory structure that governs the Alaska Salmon Hatchery Programs. Furthermore, through this format, there is opportunity to share with the Board, as well as the public, the details of our programs, research, and the ways in which they benefit all user groups.

The Board of Fish has scheduled an Alaska Salmon Hatchery Forum (item 16, Alaska Board of Fisheries Work Session agenda, rev. 09-28-2018) for discussion as part of the regularly scheduled October work session. As such, KRAA believes the language of the *Joint Protocol on Salmon Enhancement* does not provide for consideration of hatchery-related petitions or ACRs as action items during those meetings. The protocol states:

"The joint department-board meeting on hatchery [sic] described here will take place at a mutually agreeable time and place during regularly scheduled meetings of the board. The meetings will provide a forum for open discussion on a mutually agreeable agenda of hatchery topics. The agenda may include site-specific as well as regional or statewide hatchery issues. These salmon enhancement meetings will not be open for regulatory actions and no hatchery-related petitions or agenda change requests (ACRs) will be considered as action items."

Given this language and the scheduling of Alaska Salmon Hatchery Reports (item 15) as well as the Alaska Salmon Hatcheries Forum the day following ACR discussion, it would be premature to consider any action related to hatcheries prior to thorough engagement in the *Joint Protocol on Salmon Enhancement*.



Alaska's private, non-profit hatchery (PNP) associations are designed to serve the various regions of the state with programs uniquely tailored to complement and enhance existing production and benefit all user groups. The Alaska Hatchery Program was founded by visionary scientists at ADF&G and in the private sector who saw an opportunity to bolster the fishery with long-term salmon enhancement contributions. Those individuals applied their knowledge of hatchery programs in other areas of the country to create a program based on the precautionary approach and best available science. In the years since the creation of the PNP program by the Alaska Legislature, Hatchery Operators have continued to conduct those programs in cooperation with ADF&G, in good faith, and based on the tenets of the Department's guidance and policies—including the genetics policy and the policy for sustainable salmon fisheries. We see our role as stewards of the resource and contributors to our communities for the benefit of all users. As such, we do not often find ourselves pulled into the public center of battles over fish. The events of the last several months, the repeated demands by a small number of very vocal critics to the Board of Fish to take unfounded action to limit hatchery production, have forced PNP operators as well as the Board of Fisheries and countless stakeholders, to invest inordinate time and resources in what should be a non-issue.

Rather than create uncertainty in the defensibility of the Alaska Hatchery Program, the efforts of detractors have galvanized hatchery operators to take action, to make sure that the Board and the public understand the science of the programs and the benefits that accrue to all users as a result of hatchery production in Alaska. It has given us the opportunity to work together and with others to marshal the scientific information available, and work together to demonstrate both how critically important hatchery production can be to the fishery as well as how sustainable those contributions remain in a changing climate. In addition to the individual comments of myself and other PNP hatchery operators, I hope you will take note of the supplemental information provided by our groups.

The current ACRs generally imply that Alaska Hatchery Programs operate in an unregulated vacuum with irresponsible levels of production that have seen no checks or balances along the way. In fact, the established permitting process and authority delegated to ADF&G provides for rigorous scientific review and recommendations by professional biologists familiar with the programs, regulations, guiding policies and science on both a local and statewide scale. Though it has been implied by critics in recent months, the existing permitting process *does not* equate to a "rubber stamp" for permit requests. In each region there are examples of permit requests or projects that have failed to receive the recommendation of the Regional Planning Teams or that have been modified in response to application of the genetics policy and the policy for sustainable salmon fisheries. When the process is working properly, PNP hatchery operators work with their local ADF&G staff in order to assure requests for permit alteration are vetted in a manner that answers many of the basic concerns before the request is submitted. Added concerns can be voiced and taken into account through the public process, but it's often the case that many potential requests are discarded before they ever see the light of day because ADF&G staff can point to concerns related to genetics, protection of wild stocks, and provisions of the sustainable salmon policy. The process is comprehensive, transparent, efficient, and thorough.

The department's function as an objective scientific and regulatory body also provides opportunity to identify questions and information gaps related to hatchery production on a regional and statewide scale. The Hatchery-Wild Interaction study is a prime example of both the department's and the Alaska hatchery operators' commitment to inquiry and investigation of the questions surrounding possible impacts of straying. As with any long-term program or policy, what appear to be anomalous incidents and one-off sampling events should not be allowed to drive program management. Careful, unbiased inquiry, application of sound science in the consideration and development of programs, and adherence to established best practices represents both the current approach of ADF&G in regulating the Alaska Hatchery Program and the commitments of the hatchery operators.



Along with the commitment to sound science and research on hatchery topics, Alaska's PNP programs are dedicated to the communities and user groups they serve. Enhancement programs provide a measure of stability to the fisheries in each region, offsetting years of poor production and giving permit holders added opportunity in more abundant years. Opportunity on enhanced fish spreads out fishing effort and serves the purpose of reduced pressure on naturally spawning runs. In a given year, hatchery terminal areas and associated districts ideally give managers a place to direct permit holders and other users during closures, and hatchery operators often put the needs of those users first. For example, KRAA pink salmon production typically represents between 10% and 25% of the pink salmon harvest in the Kodiak Management Area. Following the disastrous impacts of the warm water "blob" in the Gulf of Alaska and the 2016 pink salmon failure, KRAA's Board of Directors made the decision to forego a pink salmon cost recovery fishery at Kitoi Bay Hatchery in 2018. With a higher than expected return to the facility and in the absence of a cost recovery fishery, KRAA put more than 3.2 million additional fish into the common property fishery. That figure, though not "massive" by any measure of the average pink salmon fishery, represents over 50% of the pink salmon harvest in the KMA in 2018. It could be the difference between breaking even and a disastrous year for many permit holders. This is the function for which the enhancement programs were designed. In 2018, Kodiak enhancement programs put over \$6.5 million in estimated ex-vessel value into the hands of permit holders in the KMA alone. Hatchery programs statewide made similar and even greater differences for the permit holders in other regions.

However, benefit to commercial permit holders, processors and crews are not the only purposes of the hatchery programs. In 2018 the local subsistence sockeye and sport coho system in Kodiak, the Buskin Lake and river system, has all but failed. At the same time, KRAA's sockeye stocking projects in Port Lions, and Ouzinkie, and the coho stocking project on the Kodiak Road System have provided numerous opportunities for sport and subsistence that directly benefit these local communities. Thousands of coho salmon in Mill Bay and Monashka Bay have been caught by everyone from anglers standing on the beach to stand-up paddle boarders, locals interested in filling their freezers, and professional sport fishing charter operators. These are the programs most likely to suffer the greatest impacts in the face of any restrictions, caps, or moratoriums on hatchery production, and I would again encourage you to refrain from entertaining any such restrictions when engagement in the *Joint Protocol on Salmon Enhancement* will do much to answer both the generalities and specifics of questions related to hatchery interactions and production levels.

Restrictions to hatchery production, caps or moratoriums on future production would not take into account the interests or needs of a region. Taking steps to implement such restrictions would be both needlessly punitive in the face of no demonstrated harm and no empirical evidence to suggest long term impacts. Further, restrictions now would likely have unintended negative consequences for the Associations and for all user groups. In closing, KRAA would repeat our opposition to ACR 1 and ACR 2 and provide specific points to address those proposals in the pages following. Finally, once again, we encourage interest and engagement in the *Joint Protocol on Salmon Enhancement* and look forward to sharing the success story of the state's salmon enhancement programs through that process.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Fairbanks".

Tina Fairbanks
Executive Director
Kodiak Regional Aquaculture Association

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



ACR 1: Prohibit Valdez Fisheries Development Association from incubating, rearing, and releasing pink salmon resulting from additional egg take capacity permitted in 2018 and cap egg take capacity at the level permitted in 2017 (5 AAC 24.366). Submitted by Kenai River Sportfishing Association

PERMITTING:

- The permit increase in question was covered in-depth in comments submitted for the July Meeting related to the identical emergency petition submitted by the same proposer.
- The permit increase in question was approved as an incremental increase in 2014—more than 4 years ago. It underwent thorough review and consideration by ADF&G.
- The permit increase in question was not approved as originally submitted but was revised to the satisfaction of the Department and the Commissioner for implementation in 2018.
- Authority over hatchery permitting has been delegated to ADF&G since inception of the programs. The regulatory process for permitting is transparent, rigorous, and should stand.
- ADF&G maintains the staff and expertise to evaluate and permit hatchery operations, and added steps to permitting and regulatory oversight would be unnecessarily burdensome and inefficient.
- The ACR does not meet criteria for consideration. This is verified by ADF&G staff comments (RC2) in which they submit 1) there is no fishery conservation purpose; 2) no error in regulation is addressed; and 3) the ACR does not address an effect of a regulation that was unforeseen at the time the regulation was adopted.

STRAYING CONCERNS

- Concerns over straying are both integral to the assumptions and knowledge on which the programs were built (not unforeseen) and also in the process of intensive study through the Hatchery-Wild Interaction study (HWI). This effort addresses (c) (1) (D) of the Sustainable Salmon Policy to address interactions between wild and enhanced salmon.
- Protection of wild stocks: preliminary findings of the HWI indicate that harvest rate of hatchery returns of pink salmon to PWS from 2013-2015 ranged from 95-99% (including broodstock) while harvest of naturally spawning stocks ranged from 26-53% during those years (State of Alaska Hatchery Research Project, Progress Synopsis, June 2018). Given this information, management appears to have the ability to assure near-to-full capture of hatchery production (an intended benefit of the programs) and provide for the protection and robust escapement of local wild stocks.
- Region-wide pink salmon hatchery fractions in PWS from 2013-2015 were calculated as 4%, 15% and 10% respectively. The stray rate during those years was 1-5% (hatchery pink salmon that spawned naturally).
- 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). These studies demonstrate natural stray rates equal to or in excess of those observed in PWS from 2013-2015.
- The locus of the straying concern cited by the proposer, Lower Cook Inlet, is centered on data that was opportunistically collected in 2017 and do not represent sampling distribution throughout the run. Baseline sampling has not been conducted in many of the 2017 sampling locations because it is rare for pink salmon to be present in those



locations. 2017 provided anomalous conditions that likely led to the high incidence of PWS fish.

FOOD COMPETITION/OCEAN CARRYING CAPACITY

- With regard to food competition concerns cited by the proposers, the large body of work collected and reviewed by the North Pacific Anadromous Fish Commission provides extensive information related to biomass of pink salmon in the North Pacific Ocean. Ruggerone, 2018, indicates that hatchery-produced pink salmon represent only 15% of the total pink salmon biomass in the North Pacific. Alaska's Hatchery programs produce only a portion of that percentage.
- To suggest that "massive releases" of Alaska Hatchery pink salmon, in competition with sockeye and King salmon for food resources, are suppressing returns of those other species is not a claim supported by empirical evidence. Sockeye and king salmon returns have varied in productivity independent of relatively consistent hatchery production from the early 1990s through the present.
- For a summary analysis of information, see "High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate" by Alex Wertheimer and William Heard as submitted with comments from NSRAA.

ACR 2: Cap statewide private non-profit salmon hatchery eggtake capacity at 75% of the level permitted in 2000 (5 AAC 40.XXX). Submitted by Virgil Umphenour

HISTORY/MERITS

- The ACR does not meet the criteria and makes no effort to do so in writing. There is no conservation issue conveyed or supported in this ACR. No regulatory issue or unforeseen regulatory effect on a fishery is identified.
- The ACR claims there was agreement to reduce hatchery production by 25% in February of 2001; however there appears to be no official record of a decision or direction to reduce or cap production.
- This ACR if accepted for consideration or if implemented is likely to have unintended negative consequences. As written, this ACR applies to all species and would likely have the greatest impacts on projects designed to have direct benefits to sport and subsistence users.

SPORT AND SUBSISTENCE IMPACTS

- KRAA's Subsistence and Sportfish production is provided at no cost to users. All costs are subsidized through Salmon Enhancement Tax collected from commercial salmon permit holders and through cost recover activities.
- Programs impacted:
 - Crescent Lake sockeye and coho stocking projects (subsistence and sport) with direct benefit to the village of Port Lions would likely cease—unsupportable with reduced production
 - Ouzinkie Sockeye saltwater net pen sockeye release and Katmai Lake coho stocking projects (subsistence and sport) would likely cease—not permitted in 2001
 - Telrod Cove sockeye saltwater net pens with benefit to the village of Larsen Bay (subsistence and commercial) would cease—not permitted in 2001



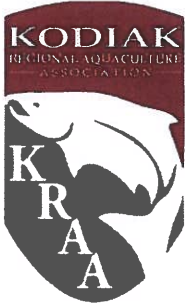
- King salmon product (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable
- Coho Salmon Production, Kodiak Road system (sportfish)—loss of production, not permitted in 2001
- Rainbow Trout (sportfish, cooperative project with ADF&G)—loss of production, likely unsupportable
- Kitoi Bay hatchery coho (sport and commercial benefit)—likely 45% reduction in returns
- Kitoi Bay Hatchery Sockeye production (subsistence and commercial)—reduction in production, potential loss of program

COMMERCIAL IMPACTS

- Impacts to production of pink, chum, and sockeye salmon: Overall potential loss of over \$5 million annually in ex-vessel value
 - Pink salmon releases would decrease by over 35%, and, on average, the fishery would lose nearly 3 million fish on an annual basis.
 - At 2018 prices, that would constitute a potential **loss of \$3.5 million in ex-vessel value** to the common property fishery annually
 - Chum salmon releases would decrease by over 30%, and, on average, the fishery would lose as many as 200,000 fish on an annual basis
 - At 2018 prices, that would constitute a potential **loss of \$714,000 in ex-vessel value** to the common property fishery annually
 - Reductions in sockeye salmon production at Kitoi Bay and Pillar Creek Hatcheries would result in potential loss of over 150,000 adult sockeye salmon per year
 - At 2018 prices, that would constitute a potential **loss of over \$1 million in ex-vessel value** to the common property fishery annually

ECONOMIC/ORGANIZATIONAL IMPACTS

- Enhancement provides stability and opportunity to the fishery; Supports reliable processing capacity and processing sector jobs as well as other support industries
- Generate added income for municipalities and local governments through landing tax on enhanced harvest
- Direct and indirect employment: KRAA employs 40-45 individuals per year with total payroll in excess of \$1.8 million annually. This likely equates to effects on over 400 local jobs.
- Reductions in production would likely mean loss of 8-12 positions (5 year-round, 3-7 seasonal positions) for KRAA
- Reduced production would decrease cost-benefit of programs. Many may become unsupportable.
- KRAA spends over \$1 million annually with local vendors and Alaskan companies
- Even with organizational cuts and efficiencies, cost recovery activities would consume a greater proportion of the returns and benefit to users.



KODIAK REGIONAL AQUACULTURE ASSOC

104 Center Avenue
Kodiak, Alaska 99503



Phone: 907-486-6555
Fax: 907-486-4105
www.kraa.org

October 8, 2019

Alaska Board of Fisheries
Reed Morisky, Chair
Attn: Glen Haight, Executive Director
1255 W 8th Street
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,

A handwritten signature in black ink that reads "Tina M. Fairbanks".

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.



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Wasilla, Alaska, and I participate in the commercial and subsistence salmon fisheries of the Prince William Sound Region.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Kondra Kuzmin
kondrakuzmin@yahoo.com
(907) 399-2181

From: Kory Blake
P.O. Box 1122
Cordova, AK 99574



PC137
1 of 7

History: Born in Cordova still living in Cordova
Copper River fishery 50 years
Seined PWS Captain 27 years Crewed 10 years

Concern: 2020 Copper River fishery.

We were shut down from 6/18/20 to 7/6/20. Then again 7/7/20 to 7/16/20
18 stait days and another 9 days.

This is the run timing for Gulkana Hatchery 6/20 Thru 7/20. If we didnt ~~catch~~ fish where did the fish go! They never got to the Hatchery for the last five years! This fact alone should tell the Board that theres a lot of overfishing going on upriver! Look at 2020 Sonar count run timing.

In 2021 you can see we were shut down during our early peak season 5/25/21 to 6/9/21. 15 days without an opener. During the closure we overexcaped 100,000 plus fish. Then again ~~6/25~~ 6/25 to 7/21/21 Gulkana run timing 60,000 to 100,000 fish, while we were fishing. Point still no brood stock for Gulkana Hatchery. Where did they GO?



The gillnet fleet has had Inside waters closed in 2020 till the 6th of July and in 2021 till the 5th of July

History: We used to fish All waters inside ~~the~~ early 1900s till mid 1980s. Monday 6 AM to Wed 6 AM! then Thursday 6 PM till Saturday 6 AM. We used to fish King gear also during this time.
 We lost King Gear for conservation
 We lost Inside openers " " "
 We lost Time for conservation

Now we only fish on the Bars or outside the bars, With less time & No King Gear!

Maybe let some fish go by the fishwheels
 Maybe for conservation only ~~to~~ operate fish wheels 6 AM Friday till 7 PM Sunday!
 They shut down Yukon fishwheels, WHY?
 Maybe restrict a new fishery: Dipnetting by Boats to Monday 6 AM to Thursday 6 PM, so not to conflict with fish wheels.

State should shut down time and area for Dragger/Trawlers. They are catching more King Salmon than All of State catch! They are making it bad for All State fisheries Subsistence Sport and Drift fleets. Look at the Yukon, Kenai, King returns.

State mandate is not reallocate fish.
But in last 40 years the gillnet fleet
has lost time / Area / Net restrictions.
While other users have Increased
opportunities Dip nets size increase,
Leasing fishwheels.

State should ban all bait for sport
Chinook and Coho Salmon!

Restricting fisherys upriver on Mondays
Thru Thursdays is not a restriction.
7PM Thursday thru Sunday 7 PM I would
consider a restriction for upriver users.

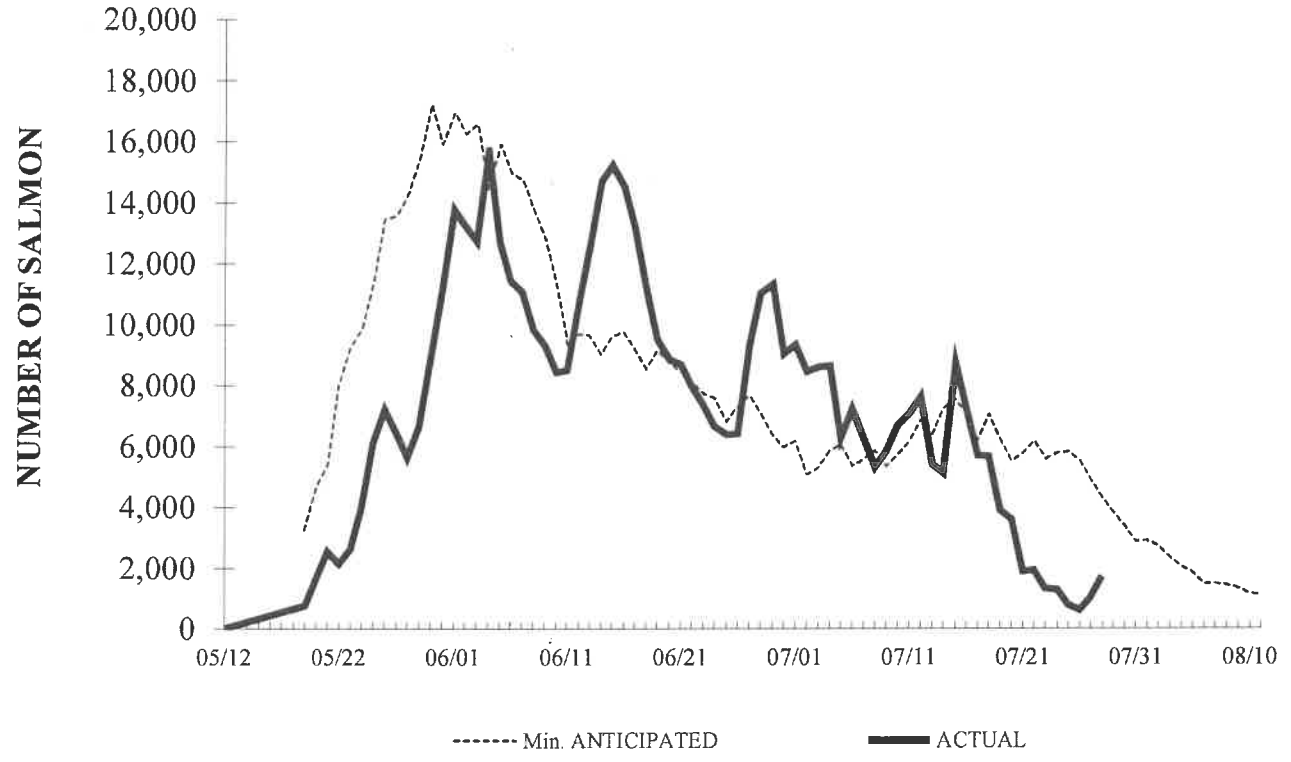
The gillnet fleet should never get shut
down for more than 3 or 4 days during
any peak run timing. We cant catch
them once they go in the Bars. This
cost the fleet millions in revenue. We
loss markets and revenue for State,
Citys and fleet.

Page 6 is support of proposals
Page 7 is oppose of proposals

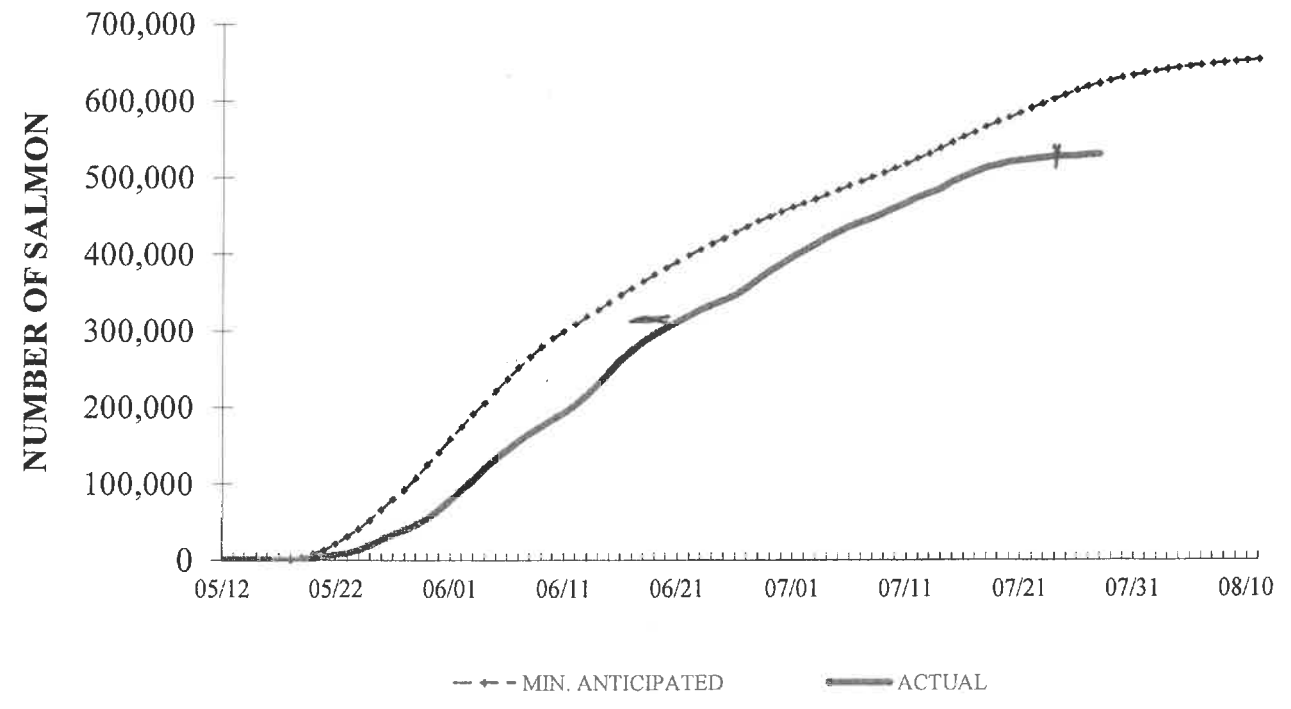


2020 MILES LAKE SONAR COUNTS

DAILY



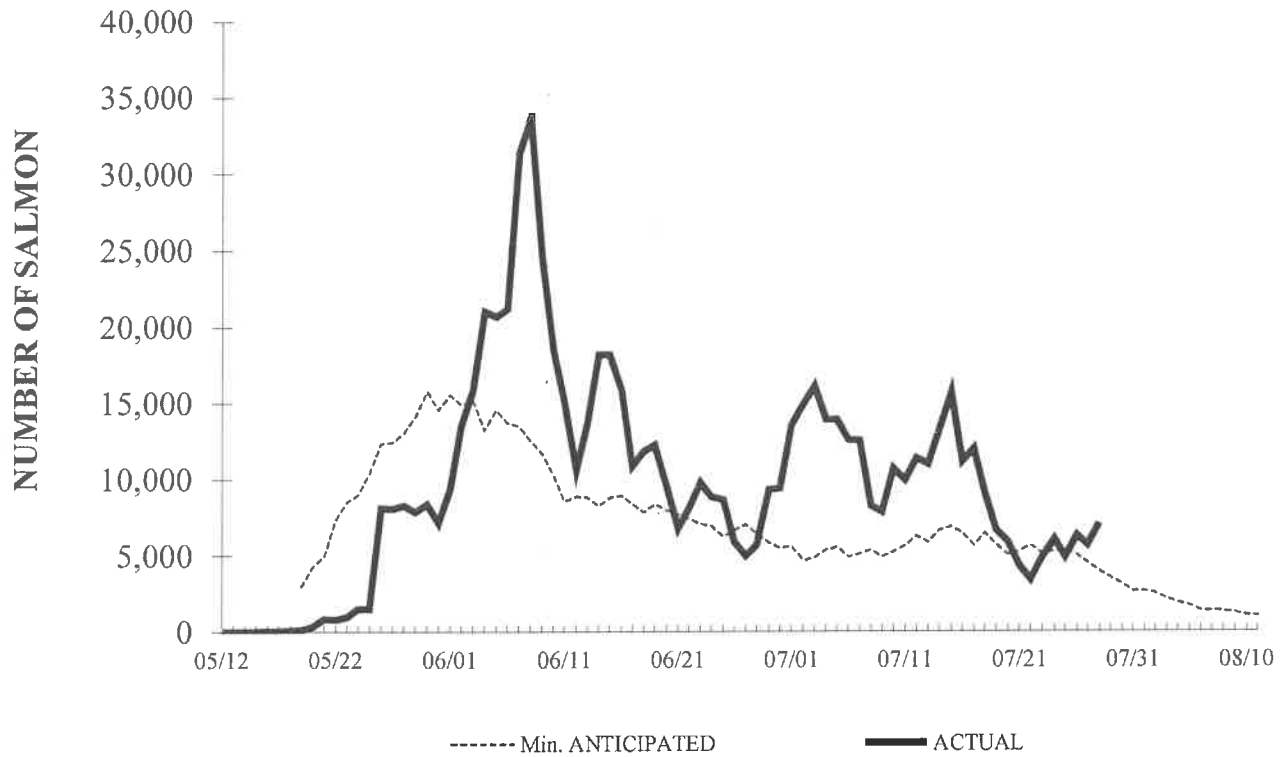
CUMULATIVE



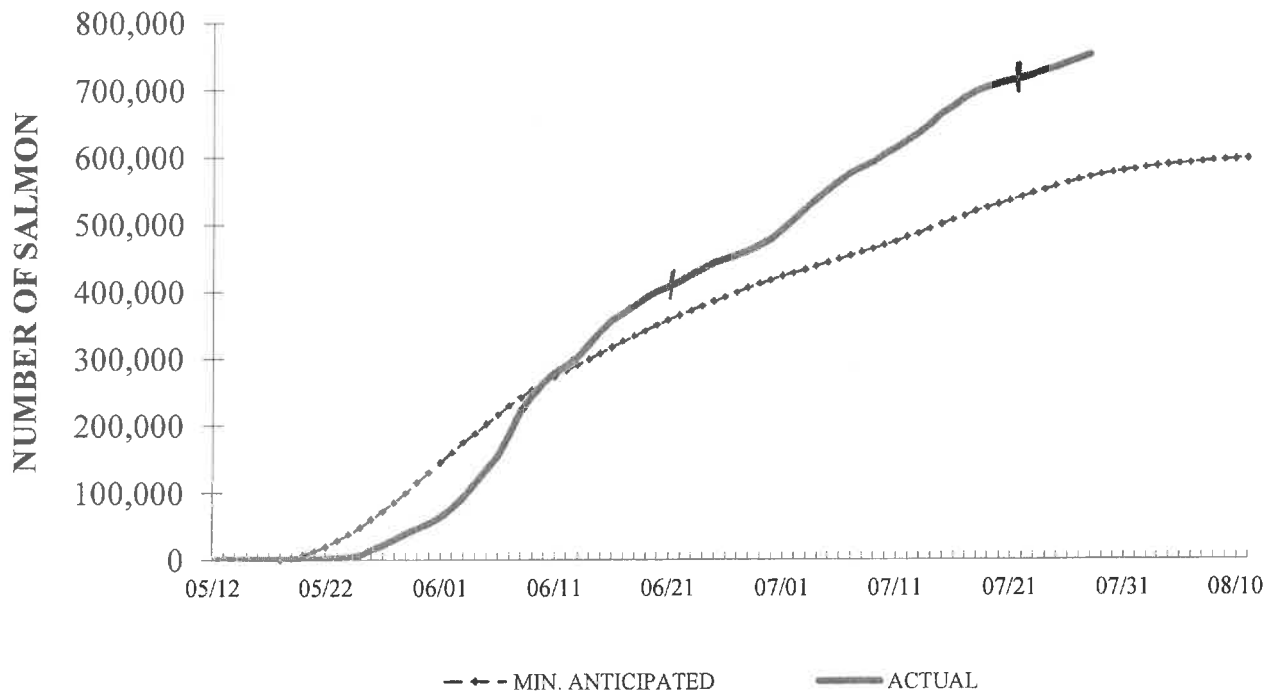


2021 MILES LAKE SONAR COUNTS

DAILY



CUMULATIVE





Im in Support of the following proposals.

- # 1 skate fishery
- # 6 for the health of resource
- # 7.
- # 8 for the health of resource
- # 9 to 11 Support Conservation of resource
- # 14 Conservation of Chinook resource
- # 15
- # 19 All share in low abundance
- # 20 Strongly support
- # 38 " "
- # 39 Support
- # 40 Strongly support
- # 42 even playing field
- # 43 would only be fair
- # 44 " " "
- # 46 Support
- # 59 "
- # 61 and 62 Support
- # 63 thru 67 support
- # 69 Thru 72 Support.



I oppose the following proposals

5 AAC 24.361 ~~limiting~~ spawning greater than
21,000 to 31,000 max

- # 18 Will interfere with NVE study
- # 21 gillnet fleet has closures upriver needs closures
- # 27 Strongly oppose
- # 28 not very clear
- # 29 gear conflicts with cost recovery
- # 31 we are not the Kenai
- # 45 would limit drift fleet even more
- # 47 No truth to this
- # 48 oppose Intercepting Sockeye going to Main Bay
- # 49 Strongly oppose
- # 54 55 Strongly oppose
- # 50 51 52 53 Strongly oppose
- # 56 oppose
- # 57 oppose
- # 58 would intercept more sockeye going to
main bay Allocative

Thank you for your time

Kooy Blake



Submitted By
Kyle Shedd
Submitted On
11/6/2021 9:11:55 AM
Affiliation

Phone
9073425131
Email
kylershedd@gmail.com
Address
7241 Huffman Road
Anchorage, Alaska 99516

Support for Proposal 27

As a participant in the Copper River subsistence fishery, I have appreciated the addition of subsistence openers on Saturdays that was adopted at the 2017 board meeting. Prior to that, subsistence users were forced to compete with commercial fishermen during regularly scheduled commercial openers. Given the vast disparity in fishing power between a commercial fishermen and subsistence users, it was often challenging to catch enough fish for the year in one or two periods of fishing. Being able to fish on Saturdays has also opened up access to subsistence users that are unable to fish during commercial openers that typically take place during the work week...as long as the weather was good, the tides were right, and there wasn't a 48 hour commercial period that just took place from Thursday morning until Saturday morning that had cleaned out almost all the fish in the district.

Proof that there was need for additional subsistence opportunity in the Copper River District is evident from the increase in both subsistence harvest and fished permits in 2018 and 2019 (avg. 7,021 salmon and 392 permits; data from RC 2 Table 27-1) after the addition of Saturday subsistence openers compared to the previous 9 year averages from 2009-2017 (avg. 2,793 salmon. and 161 permits). A similar increase in subsistence harvest and participation was also seen in the Prince William Sound general area subsistence fishery (2018-2019 avg. 293 salmon and 12 fished permits vs. 2009-2017 avg. 37 salmon and 4 fished permits; data from RC 2 Table 27-2).

Further evidence of the need for increased subsistence access is the fact that not once in the past 11 years have either of the villages of Tatitlek or Chenaga been able to harvest enough salmon to meet the lower bound of the amounts reasonably necessary for subsistence (ANS; data from RC 2 Table 27-3)!

Despite the increase in subsistence harvest in the Copper River and PWS subsistence fisheries, the overall harvest is fairly low (<10,000 salmon / year) and remains lower than commercial homepack (data from RC 2 Table 27-4), so there are no serious conservation concerns with increasing access to subsistence users.

In summary, this proposal would increase access to subsistence users, who under state law should have the highest priority when a harvestable surplus is available. There are few legitimate conservation concerns given the relatively small amount of subsistence harvest compared to commercial homepack, let alone commercial harvest. The board should adopt this common sense proposal.

Sincerely,

Kyle



Submitted By
Laine Welch
Submitted On
11/4/2021 11:28:09 AM
Affiliation
media

Phone
9074862391

Email
msfish@alaskan.com

Address
315
High Street
KODIAK, Alaska 99615

In my 30+ years of covering the Alaska "fish beat" I am well aware of how important the contribution of hatchery salmon is to commercial fishermen around the state. At times of low salmon returns, hatchery fish help sustain Alaska's fishermen and communities. They also provide for sport, personal use and subsistence users - at no cost to the state.

I urge the Board of Fisheries to remain as strong advocates for Alaska's hatchery program and vote against Proposals 49-55 that aim to curtail production at Prince William Sound.



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* Indicates a required field

Board Meeting Select a meeting (Meeting Title - Comment Deadline) *Prince William Sound*

Name * *Lee R. Adler* Affiliation

Contact Phone * *907-922-3166* Email * *Adleralaska@gmail.com*

Address Line 1 * *Box 285 Glennallen, AK 99588*

Address Line 2

City * *Glennallen*

State * *AK* - *99588* Zip *

Do you consent to your contact information being included on printed copies of your comment? *

Yes No

Comment *

Format

I have lived in Glennallen since 1969, and worked as a Wildlife Biologist and other things up until about 10 years ago grayling were plentiful in Moose Cr. Then after several years of over harvest during the spams, they declined. In the past 4 years it has been a waste of time to fish for them. They need protection in order for a come back.

body p
Words: 0 (Limit: 5000)

I agree with the proposal to restrict to catch & release from April 1 to May 30.

Click submit once. The process may take several moments. You will receive an email confirmation. Difficulties? Contact 465-4110 for Boards Support staff, or click the "About Submitting Comments" tab above for other ways to submit.

Thank you!

*Lee R. Adler
11-27-20*



Alaska Board of Fish Members



My name is Leroy L Cabana

My comment is on proposal 43

I am against proposal 43 for the following reasons, The PWS Allocation plan was adopted after years of meetings and full input from all user groups. The basis for the allocation plan to only allocate PWSAC hatchery produced salmon in the plan is simple and effective. The intent is to keep the PWSAC hatchery salmon allocated by specific percentages with access to fishing in Chalmers, Wally Noernberg , Main Bay, Cannery Creek, Armin Koernig and Gulkana for the set gillnet, drift gillnet and purse seine fishermen balanced on the long term harvest history that existed prior to hatchery production.

When the allocation plan was finalized in 2005 it included clear language that acknowledged the Allocation plan would only include PWSAC production as the wild sockeye production on the Copper River basically balanced out the wild pink and VFDA hatchery harvest values. There were long and informative discussions about adding all salmon harvest values to the PWS Salmon Allocation Plan and it was decided the salmon harvested outside of PWSAC production would likely balance out in the long term.

The attached salmon harvest pages clearly show the total value to each gear group from 1984 through 2019. These numbers are from the harvest values provided by Shellene Hutter at ADFG in Juneau. ADFG did not have prior years to 1984 digitalized from the COAR report. Looking at the total harvest values between the purse seine fleet and the drift gillnet fleet you will see there is \$ 1,102,754,454.12 from 1984 through 2019 for the drift gillnet fleet and \$ 1,024,499,348.71 for the purse seine fleet. This is a 78 plus million dollar advantage for the drift gillnet fleet for the years 1984 through 2019. These numbers represent the **TOTAL** value of salmon harvested from both fleets, it includes PWSAC, all wild stocks and VFDA. In summery, if someone tried to accomplish a long term equitable balance for the purse seine fleet and the drift gillnet fleet this was accomplished. There is no financial justification to change the Prince William Sound Salmon Allocation Plan. Both PWSAC and all other salmon harvest values have managed to balance themselves out for the last 34 years.

This proposal has been submitted for the last two board of fish PWS cycles. Both times it failed 7 to 0.

The drift gillnet fleet has been considerably ahead of the purse seine fleet in total harvest value in PWS for all salmon for years.

PWS 1984 - 2019 EXVESSEL VALUE\$ ANALYSIS DRIFT GILLNET

YEAR	CHINOOK	%	CHUM	%	COHO	%	PINK	%	SOCKEYE	%	YRLY TOTAL	%
1984	\$1,541,171.00	99.4%	\$1,264,478.00	42.9%	\$5,350,015.00	95.7%	\$2,032,442.00	10.8%	\$7,862,220.00	88.9%	\$18,050,326.00	47.8%
1985	\$1,767,580.00	99.9%	\$952,837.00	26.1%	\$8,737,982.00	98.9%	\$367,507.00	2.0%	\$10,529,684.00	87.2%	\$22,355,590.00	50.4%
1986	\$1,427,673.00	99.5%	\$1,442,445.00	32.8%	\$3,946,684.00	97.7%	\$1,007,549.00	11.5%	\$11,498,983.00	89.3%	\$19,323,334.00	61.4%
1987	\$2,357,001.00	99.7%	\$961,662.00	14.7%	\$1,357,559.00	90.1%	\$2,280,690.00	5.7%	\$18,441,981.00	89.7%	\$25,398,893.00	35.8%
1988	\$2,721,660.00	99.6%	\$5,665,224.00	36.1%	\$8,697,590.00	95.4%	\$5,059,171.00	17.2%	\$13,695,633.00	97.0%	\$35,839,278.00	50.4%
1989	\$1,880,617.00	99.0%	\$625,646.00	20.2%	\$1,766,650.00	82.9%	\$628,204.00	3.3%	\$18,095,271.00	99.4%	\$22,996,388.00	51.7%
1990	\$1,269,631.00	99.8%	\$4,233,372.00	72.3%	\$3,776,036.00	84.6%	\$2,585,035.00	8.0%	\$11,899,796.00	98.0%	\$23,763,870.00	42.5%
1991	\$1,047,971.00	99.8%	\$1,654,004.00	94.7%	\$3,675,684.00	98.4%	\$248,124.00	2.9%	\$11,773,066.00	99.1%	\$18,398,849.00	68.1%
1992	\$2,702,232.00	99.9%	\$1,226,288.00	89.9%	\$4,391,851.00	94.9%	\$735,292.00	21.0%	\$19,581,734.00	97.6%	\$28,637,397.00	88.8%
1993	\$1,063,103.00	100.0%	\$2,925,899.00	99.2%	\$2,788,823.00	99.3%	\$165,885.00	10.2%	\$12,500,061.00	98.8%	\$19,443,771.00	92.1%
1994	\$1,537,528.00	99.9%	\$2,666,528.00	94.0%	\$7,208,605.00	96.7%	\$301,562.00	2.0%	\$9,922,158.00	94.5%	\$21,636,381.00	58.2%
1995	\$3,050,954.00	100.0%	\$1,429,921.00	88.7%	\$3,176,270.00	90.9%	\$1,015,251.00	11.6%	\$11,950,317.00	98.4%	\$20,622,713.00	70.9%
1996	\$1,881,726.00	93.0%	\$797,882.00	71.0%	\$1,218,718.00	76.9%	\$192,520.00	4.4%	\$18,569,487.00	92.4%	\$22,660,333.00	77.4%
1997	\$2,451,215.00	99.8%	\$2,245,089.00	54.0%	\$123,335.00	32.4%	\$207,157.00	2.8%	\$23,250,362.00	97.4%	\$28,277,158.00	73.8%
1998	\$3,817,545.00	99.9%	\$1,521,196.00	66.0%	\$705,803.00	84.4%	\$668,211.00	6.3%	\$14,390,937.00	99.2%	\$21,103,692.00	65.8%
1999	\$4,848,226.00	85.8%	\$2,012,092.00	50.6%	\$817,400.00	66.3%	\$1,979,592.00	14.1%	\$19,602,817.00	88.3%	\$29,260,127.00	62.1%
2000	\$2,273,294.00	90.0%	\$2,752,388.00	37.0%	\$2,092,274.00	64.1%	\$227,881.00	1.7%	\$13,542,355.00	93.3%	\$20,888,192.00	50.9%
2001	\$2,784,419.00	99.7%	\$2,830,134.00	47.6%	\$834,262.00	74.3%	\$122,849.00	1.5%	\$12,301,780.00	87.2%	\$18,873,444.00	59.1%
2002	\$2,806,768.00	99.9%	\$2,290,746.00	48.7%	\$2,096,245.00	96.7%	\$27,752.00	1.1%	\$15,100,652.00	98.9%	\$22,322,163.00	81.0%
2003	\$3,735,828.17	100.0%	\$915,959.72	35.2%	\$1,733,710.61	88.0%	\$56,337.30	0.6%	\$14,880,270.23	91.6%	\$21,322,106.03	62.2%
2004	\$3,533,773.57	100.0%	\$1,013,464.62	42.2%	\$3,773,914.34	96.2%	\$120,488.93	2.7%	\$13,174,540.79	97.8%	\$21,616,182.25	77.7%
2005	\$3,452,644.97	99.9%	\$1,900,334.52	64.4%	\$2,427,360.24	82.1%	\$60,293.00	0.4%	\$16,143,038.39	95.1%	\$23,983,671.12	55.9%
2006	\$3,087,345.04	99.8%	\$891,448.88	22.2%	\$3,926,923.08	73.1%	\$60,704.09	0.9%	\$19,390,939.99	95.4%	\$27,357,361.08	69.3%
2007	\$3,919,437.32	99.8%	\$2,625,471.61	48.2%	\$1,518,044.93	70.4%	\$89,961.08	0.3%	\$27,388,669.94	95.9%	\$35,541,584.88	49.3%
2008	\$1,494,510.43	99.8%	\$11,391,502.01	58.8%	\$4,113,778.10	66.7%	\$1,181,565.93	2.8%	\$12,027,784.87	89.3%	\$30,209,141.34	36.3%
2009	\$1,039,994.54	99.8%	\$9,614,385.01	87.9%	\$3,177,535.85	92.6%	\$344,418.87	3.8%	\$19,365,135.13	92.6%	\$33,541,469.40	73.9%
2010	\$1,053,029.95	99.1%	\$18,472,061.45	92.9%	\$3,537,131.77	98.5%	\$4,470,714.95	5.0%	\$21,850,060.47	88.8%	\$49,382,998.59	35.4%
2011	\$2,165,209.10	99.7%	\$8,693,077.29	91.1%	\$2,045,358.36	78.0%	\$1,016,182.69	2.8%	\$37,093,257.69	93.7%	\$51,013,085.13	56.2%
2012	\$1,683,187.34	90.3%	\$14,795,400.78	85.5%	\$2,014,289.35	94.1%	\$1,749,734.98	3.8%	\$41,720,828.61	91.7%	\$61,963,441.06	54.9%
2013	\$1,124,186.20	98.1%	\$12,865,040.76	84.6%	\$4,227,642.63	69.9%	\$2,597,348.35	2.6%	\$32,154,242.17	92.6%	\$52,968,460.11	33.9%
2014	\$1,207,221.56	98.7%	\$3,838,261.86	66.7%	\$4,766,675.99	89.3%	\$1,521,493.46	4.1%	\$43,735,929.55	94.8%	\$55,069,582.42	57.5%
2015	\$2,265,307.31	99.5%	\$3,842,522.42	74.2%	\$1,040,907.37	92.4%	\$735,275.69	1.1%	\$29,639,788.44	86.3%	\$37,523,801.23	34.8%
2016	\$1,369,061.91	99.7%	\$7,187,409.99	79.0%	\$6,224,251.69	97.2%	\$107,650.02	0.9%	\$21,846,323.29	90.2%	\$36,734,696.90	68.4%
2017	\$2,162,706.99	99.8%	\$13,812,058.32	54.6%	\$5,773,263.62	90.0%	\$1,140,383.67	1.8%	\$18,400,792.48	86.6%	\$41,289,205.08	34.5%
2018	\$1,688,515.93	99.5%	\$14,752,650.72	65.7%	\$6,323,335.77	88.9%	\$877,537.50	2.7%	\$12,512,094.15	83.3%	\$36,154,134.07	45.7%
2019	\$3,069,076.05	99.9%	\$9,099,148.65	69.2%	\$2,578,673.20	49.3%	\$797,590.74	1.7%	\$31,687,145.79	89.2%	\$47,231,634.43	45.5%
TOTALS	\$81,281,350.38	98.1%	\$175,208,029.61	64.2%	\$121,964,582.90	86.9%	\$36,780,355.25	4.0%	\$687,520,135.98	92.7%	\$1,102,754,454.12	51.2%

PWS 1984 - 2019 EXVESSEL VALUE\$ ANALYSIS PURSE SEINE

YEAR	CHINOOK	%	CHUM	%	COHO	%	PINK	%	SOCKEYE	%	YRLY TOTAL	%
1984	\$9,248.00	0.6%	\$1,680,831.00	57.1%	\$237,832.00	4.3%	\$16,761,083.00	89.2%	\$985,292.00	11.1%	\$19,674,286.00	52.2%
1985	\$2,520.00	0.1%	\$2,703,425.00	73.9%	\$100,564.00	1.1%	\$17,690,309.00	98.0%	\$1,542,189.00	12.8%	\$22,039,007.00	49.6%
1986	\$7,833.00	0.5%	\$2,961,831.00	67.2%	\$94,165.00	2.3%	\$7,724,386.00	88.5%	\$1,378,230.00	10.7%	\$12,166,445.00	38.6%
1987	\$7,049.00	0.3%	\$5,601,190.00	85.3%	\$148,857.00	9.9%	\$37,641,274.00	94.3%	\$2,109,733.00	10.3%	\$45,508,103.00	64.2%
1988	\$11,137.00	0.4%	\$10,019,868.00	63.9%	\$421,951.00	4.6%	\$24,390,556.00	82.8%	\$426,979.00	3.0%	\$35,270,491.00	49.6%
1989	\$19,569.00	1.0%	\$2,477,541.00	79.8%	\$365,398.00	17.1%	\$18,514,106.00	96.7%	\$111,017.00	0.6%	\$21,487,631.00	48.3%
1990	\$2,251.00	0.2%	\$1,622,655.00	27.7%	\$689,950.00	15.4%	\$29,584,493.00	92.0%	\$245,072.00	2.0%	\$32,144,421.00	57.5%
1991	\$1,754.00	0.2%	\$91,667.00	5.3%	\$58,483.00	1.6%	\$8,354,142.00	97.1%	\$103,651.00	0.9%	\$8,609,697.00	31.9%
1992	\$3,392.00	0.1%	\$138,048.00	10.1%	\$236,668.00	5.1%	\$2,765,763.00	79.0%	\$475,924.00	2.4%	\$3,619,795.00	11.2%
1993	\$391.00	0.0%	\$22,992.00	0.8%	\$19,363.00	0.7%	\$1,463,615.00	89.8%	\$155,980.00	1.2%	\$1,662,341.00	7.9%
1994	\$1,061.00	0.1%	\$168,719.00	6.0%	\$247,698.00	3.3%	\$14,540,953.00	98.0%	\$577,230.00	5.5%	\$15,535,661.00	41.8%
1995	\$1,279.00	0.0%	\$182,158.00	11.3%	\$316,464.00	9.1%	\$7,760,003.00	88.4%	\$196,613.00	1.6%	\$8,456,517.00	29.1%
1996	\$142,287.00	7.0%	\$326,025.00	29.0%	\$366,938.00	23.1%	\$4,226,742.00	95.6%	\$1,537,398.00	7.6%	\$6,599,390.00	22.6%
1997	\$3,955.00	0.2%	\$1,913,511.00	46.0%	\$257,157.00	67.6%	\$7,256,099.00	97.2%	\$620,114.00	2.6%	\$10,050,836.00	26.2%
1998	\$4,089.00	0.1%	\$783,629.00	34.0%	\$130,745.00	15.6%	\$9,955,526.00	93.7%	\$118,090.00	0.8%	\$10,992,079.00	34.2%
1999	\$803,237.00	14.2%	\$1,964,281.00	49.4%	\$415,215.00	33.7%	\$12,080,373.00	85.9%	\$2,606,438.00	11.7%	\$17,869,544.00	37.9%
2000	\$252,769.00	10.0%	\$4,693,604.00	63.0%	\$1,169,966.00	35.9%	\$13,071,370.00	98.3%	\$976,030.00	6.7%	\$20,163,739.00	49.1%
2001	\$6,465.00	0.2%	\$3,089,734.00	51.9%	\$287,873.00	25.7%	\$7,810,534.00	97.9%	\$484,093.00	3.4%	\$11,678,699.00	36.6%
2002	\$1,673.00	0.1%	\$2,408,435.00	51.2%	\$70,898.00	3.3%	\$2,586,975.00	98.9%	\$69,908.00	0.5%	\$5,137,889.00	18.6%
2003	\$803.66	0.0%	\$1,684,518.23	64.7%	\$235,885.62	12.0%	\$9,650,694.63	99.4%	\$790,621.87	4.9%	\$12,362,524.01	36.1%
2004	\$1,577.94	0.0%	\$1,374,272.75	57.2%	\$139,387.55	3.6%	\$4,379,222.05	97.2%	\$28,426.44	0.2%	\$5,922,886.73	21.3%
2005	\$2,916.81	0.1%	\$1,045,929.71	35.4%	\$525,984.01	17.8%	\$16,495,183.41	99.5%	\$328,262.41	1.9%	\$18,398,276.35	42.9%
2006	\$4,768.20	0.2%	\$3,101,225.50	77.2%	\$1,445,964.24	26.9%	\$6,609,179.14	99.0%	\$228,324.00	1.1%	\$11,389,461.08	28.9%
2007	\$7,341.04	0.2%	\$2,785,779.92	51.1%	\$637,895.56	29.6%	\$31,975,325.04	99.7%	\$367,980.92	1.3%	\$35,774,322.48	49.6%
2008	\$2,599.09	0.2%	\$7,800,372.13	40.3%	\$2,052,034.69	33.3%	\$41,634,183.63	97.2%	\$560,955.37	4.2%	\$52,050,144.91	62.5%
2009	\$1,264.00	0.1%	\$1,159,766.30	10.6%	\$254,177.46	7.4%	\$8,710,838.14	96.2%	\$614,081.25	2.9%	\$10,740,127.15	23.7%
2010	\$9,286.50	0.9%	\$1,031,615.07	5.2%	\$51,987.69	1.4%	\$85,822,868.85	95.0%	\$731,874.80	3.0%	\$87,647,632.91	62.8%
2011	\$5,980.63	0.3%	\$717,984.72	7.5%	\$574,904.13	21.9%	\$35,786,596.74	97.2%	\$569,012.88	1.4%	\$37,654,479.10	41.5%
2012	\$180,473.84	9.7%	\$2,390,557.76	13.8%	\$125,337.98	5.9%	\$44,358,226.22	96.2%	\$1,585,661.88	3.5%	\$48,640,257.68	43.1%
2013	\$17,784.15	1.6%	\$2,176,375.20	14.3%	\$1,815,858.31	30.0%	\$96,357,284.46	97.4%	\$823,590.18	2.4%	\$101,190,892.30	64.8%
2014	\$15,888.68	1.3%	\$1,826,225.74	31.7%	\$570,590.60	10.7%	\$35,838,586.27	95.9%	\$561,917.98	1.2%	\$38,813,209.27	40.5%
2015	\$8,988.90	0.4%	\$1,254,984.28	24.2%	\$80,014.32	7.1%	\$64,291,451.53	98.8%	\$2,696,301.02	7.9%	\$68,331,740.05	63.3%
2016	\$898.39	0.1%	\$1,818,574.07	20.0%	\$181,902.05	2.8%	\$12,514,788.91	99.1%	\$577,984.69	2.4%	\$15,094,148.11	28.1%
2017	\$4,313.62	0.2%	\$11,400,140.82	45.1%	\$638,671.95	10.0%	\$63,289,542.83	98.2%	\$1,234,603.65	5.8%	\$76,567,272.87	64.0%
2018	\$3,734.70	0.2%	\$7,609,428.16	33.9%	\$789,291.14	11.1%	\$31,847,810.54	97.2%	\$748,716.78	5.0%	\$40,998,981.32	51.9%
2019	\$2,930.59	0.1%	\$3,933,088.09	29.9%	\$2,646,915.94	50.6%	\$45,987,489.01	98.2%	\$1,685,997.76	4.7%	\$54,256,421.39	52.3%
TOTALS	\$1,553,509.74	1.9%	\$95,960,982.45	35.2%	\$18,402,988.24	13.1%	\$879,727,573.40	96.0%	\$28,854,294.88	3.9%	\$1,024,499,348.71	47.6%

PWS 2001 - 2019 EXVESSEL VALUE\$ ANALYSIS SET GILLNET

YEAR	CHINOOK	%	CHUM	%	COHO	%	PINK	%	SOCKEYE	%	YRLY TOTAL	%
1984											\$0.00	0.0%
1985												0.0%
1986												0.0%
1987												0.0%
1988												0.0%
1989												0.0%
1990												0.0%
1991												0.0%
1992												0.0%
1993												0.0%
1994												0.0%
1995												0.0%
1996												0.0%
1997												0.0%
1998												0.0%
1999												0.0%
2000												0.0%
2001	\$1,859.00	0.1%	\$28,363.00	0.5%		0.0%	\$44,664.00	0.6%	\$1,321,431.00	9.4%	\$1,396,317.00	10.5%
2002		0.0%	\$1,484.00	0.0%	\$1,403.00	0.1%		0.0%	\$92,229.00	0.6%	\$95,116.00	0.7%
2003		0.0%	\$4,567.74	0.2%		0.0%	\$1,984.74	0.0%	\$570,394.92	3.5%	\$576,947.40	3.7%
2004	\$119.00	0.0%	\$13,660.02	0.6%	\$10,492.41	0.3%	\$3,620.79	0.1%	\$269,577.95	2.0%	\$297,470.17	2.9%
2005		0.0%	\$6,245.19	0.2%	\$2,992.22	0.1%	\$22,700.18	0.1%	\$506,524.55	3.0%	\$538,462.14	3.4%
2006	\$439.70	0.0%	\$22,201.84	0.6%	\$1,558.82	0.0%	\$7,288.11	0.1%	\$699,400.47	3.4%	\$730,888.94	4.1%
2007		0.0%	\$38,296.49	0.7%	\$532.37	0.0%	\$3,786.58	0.0%	\$791,620.93	2.8%	\$834,236.37	3.5%
2008	\$287.00	0.0%	\$172,273.70	0.9%	\$583.75	0.0%	\$9,528.58	0.0%	\$873,129.80	6.5%	\$1,055,802.83	7.4%
2009	\$945.45	0.1%	\$162,054.70	1.5%	\$9.00	0.0%	\$601.48	0.0%	\$932,039.85	4.5%	\$1,095,650.48	6.0%
2010	\$617.00	0.1%	\$383,221.84	1.9%	\$111.30	0.0%	\$11,815.90	0.0%	\$2,029,016.15	8.2%	\$2,424,782.19	10.2%
2011	\$1,450.19	0.1%	\$130,224.61	1.4%	\$832.86	0.0%	\$13,046.24	0.0%	\$1,932,383.04	4.9%	\$2,077,936.94	6.4%
2012	\$159.76	0.0%	\$124,831.84	0.7%	\$325.25	0.0%	\$18,538.69	0.0%	\$2,179,876.10	4.8%	\$2,323,731.64	5.6%
2013	\$4,137.00	0.4%	\$166,927.16	1.1%	\$884.40	0.0%	\$12,927.00	0.0%	\$1,736,388.35	5.0%	\$1,921,263.91	6.5%
2014	\$352.30	0.0%	\$88,848.79	1.5%	\$68.70	0.0%	\$17,445.17	0.0%	\$1,845,875.36	4.0%	\$1,952,590.32	5.6%
2015	\$2,197.10	0.1%	\$80,909.70	1.6%	\$5,119.90	0.5%	\$21,001.45	0.0%	\$2,011,298.21	5.9%	\$2,120,526.36	8.0%
2016	\$2,610.17	0.2%	\$93,206.32	1.0%	\$66.50	0.0%	\$8,249.96	0.1%	\$1,787,026.25	7.4%	\$1,891,159.20	8.7%
2017		0.0%	\$85,989.56	0.3%	\$677.35	0.0%	\$34,064.74	0.1%	\$1,603,122.70	7.5%	\$1,723,854.35	8.0%
2018	\$4,372.50	0.3%	\$95,388.17	0.4%		0.0%	\$48,896.81	0.1%	\$1,766,398.12	11.8%	\$1,915,055.60	12.6%
2019	\$730.16	0.0%	\$123,139.00	0.9%	\$659.50	0.0%	\$46,675.39	0.1%	\$2,151,921.45	6.1%	\$2,323,125.50	7.1%
TOTALS	\$20,276.33	0.0%	\$1,821,833.67	0.7%	\$26,317.33	0.0%	\$326,835.81	0.0%	\$25,099,654.20	3.4%	\$27,294,917.34	1.9%

**NOTE: Set Gillnet BLANK fields are "Confidential" with fewer than three processors reporting.

Submitted By
Leroy L Cabana
Submitted On
1/6/2021 12:22:07 PM
Affiliation
commercial fisherman



PC141
5 of 5

I am in favor of extending the PWS Board of Fishery meeting until at least October 2021. The ability to interact, have conversations and engage in normal BOF meetings without physical meetings due to the Covid pandemic justifies delaying the meeting. Vaccines are just now being distributed and it is unrealistic to believe the general public will be able to have in person meetings by March 2021. It is reasonable to believe the Covid pandemic will be behind us by fall of 2021. A couple hundred persons usually attend the PWS finfish meetings every 3 years. There doesn't seem to be anything on the current agenda that can not wait until the fall of 2021.

Submitted By
Lexie Bond
Submitted On
11/15/2021 8:00:19 PM
Affiliation



PC142
1 of 1

I wish to voice a strong objection to proposal 9, eliminating the use of boats in the Glennallen sub district.

My family relies on the ability to harvest salmon under a subsistence permit on the Copper River. This proposal would reduce our fishing. This area feeds our family throughout the year on a single subsistence permit, with responsible harvesting annually. We take a small count compared to the counts taken by commercial fishing of the same fish population. Fishing that area without a boat would be impossible for anyone who does not have a fish wheel, which our family does not.

A concern was voiced regarding the number of fish reaching the spawning areas. According to a report from Fish and Game, the annual harvest from subsistence is significantly lower than that of commercial or personal use. I believe we are very fortunate to live in a state with subsistence opportunities, which families depend on and I believe they should be protected for all those who depend on a subsistence way of life.

Thank you for your time,

Lexie Bond



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I am a commercial fisherman and the Executive Director of the Alaska Longline Fishermen's Association (ALFA). I am submitting these comments on behalf of ALFA's over 200 members. The Alaska Longline Fishermen's Association represents commercial fishermen who participate in fixed gear as well as salmon fisheries across the Gulf of Alaska and into the Bering Sea. Our membership is committed to sustainable fisheries and thriving fishing communities. The health of fisheries, and the actions of fishery managers, in one part of the state has implications for every other Alaska fishery and coastal community, hence PWS management decision affect our members. ALFA works to promote sustainable fisheries and thriving fishing communities across Alaska. Our members' livelihood depends directly on commercial fishing.

I am writing in regards to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Linda Behnken
alfafishak@gmail.com
(907) 783-3615



November 14, 2021

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

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Prince William Sound Board of Fisheries meeting taking place in Cordova, Alaska and wish to submit this public comment of support for Alaska's private nonprofit salmon hatchery program.

I live in Valdez, Alaska. I participate in the sport fisheries of Prince William Sound. My family operated a cannery in the past and family members commercial fished and are still fishing commercially. Salmon fishing is important as my family members commercial fish. I sport fish and eat salmon. Salmon fisheries boosts the economy in Valdez by providing jobs, sports fisherman buy goods here, charter boats, and moor their boats here in Valdez. Tourists come here to see the salmon at the hatchery or seiners fishing while out on the cruise boats Commercial fisherman buy goods and fuel, some moor their boats here. The hatcheries help the economy in this area. They also help in educating students about natural resources.

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). Thank you for your consideration.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

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Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in Cordova.

Sincerely,

Linda Guthrie
Tia.g@gci.net
(907) 831-1018

Alaska State Legislature



PC145
1 of 2



Leadership
Speaker of the House

Chair
Committee on Committees

Member
Rules Committee
Legislative Council
Fisheries Committee

REPRESENTATIVE LOUISE STUTES

Alaska State Capitol, #208
Juneau, AK 99801

Phone: (907) 465-2487
Free: (800) 865-2487

Interim:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: (907) 486-8872

Date: November 14, 2021

To: Alaska Board of Fisheries

Re: Support for Proposal 19

Dear Chair Carlson-Van Dort and Members of the Board,

I write today in strong support of proposal 19, which was brought forward by Cordova District Fishermen United.

As you are well aware, the Copper River has suffered from historically low sockeye returns in recent years. During that time, no user group has shouldered more of the burden through closed waters and lost opportunity than the Cordova gillnet fleet.

Reducing the maximum harvest levels in the Chitina personal use fishery when the Copper River commercial harvest is 50% below the 10-year average by June 1st is a commonsense, in-season trigger to ensuring the needed escapement.

During years of such obvious scarcity, closing fisheries at the mouth of the Copper River without automatically reducing upstream allocations is not only inequitable, but it also seems counterproductive to the ultimate goal of ensuring adequate spawning.

The conservation burden on the Copper River needs to be equalized between all user groups and extend into the spawning beds. I am confident that proposal 19 would lead to a brighter future for all users on the Copper River and I respectfully urge your support.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

State House Representative for District 32
Proudly Serving Kodiak, Cordova, Yakutat, and Seldovia

Alaska State Legislature



PC145
2 of 2



Leadership
Speaker of the House

Chair
Committee on Committees

Member
Rules Committee
Legislative Council
Fisheries Committee

REPRESENTATIVE LOUISE STUTES

Alaska State Capitol, #208
Juneau, AK 99801

Phone: (907) 465-2487
Free: (800) 865-2487

Interim:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: (907) 486-8872

Date: November 14, 2021

To: Alaska Board of Fisheries

Re: Opposition to Proposals 49-55

Dear Chair Carlson-Van Dort and Members of the Board,

I am writing to voice my strong opposition to proposals 49-55, which are under consideration for action at the upcoming Board of Fisheries meeting in Cordova.

Limiting or reducing hatchery production in Prince William Sound (PWS) would result in significant economic and cultural harm to the region without appropriate scientific justification.

Proponents of such proposals claim that salmon hatcheries only benefit commercial users and damage wild populations.

The reality is that since its inception, Alaska's salmon hatchery program has provided countless harvests to all user groups statewide, including sport, personal use, and subsistence users, and has been an economic engine for coastal communities and state coffers.

Moreover, studies on the interactions between wild and hatchery populations are being rigorously pursued but remain incomplete. I urge the board not to get ahead of the science on this issue.

As to the economic benefits of the facilities in question, PWS hatcheries support 2,200 jobs, generate over \$100 million in labor income, and result in \$315 million in annual overall output; simply put, they are a mainstay of local fishing fleets and regional economies.

Based on these reasons, along with many others, I respectfully request that the Board reject proposals 49-55.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

State House Representative for District 32
Proudly Serving Kodiak, Cordova, Yakutat, and Seldovia

Submitted By
Maksim
Submitted On
11/15/2021 9:57:23 PM
Affiliation
Gillnet permit holder/captain



PC146
1 of 1

Hello,
I am a young 21 year old gillnet fisherman in the Prince William Sound/Copper River areas. I am heavily invested and in debt upon entering this fishery. Several of my friends are just as young and heavily invested into the fishery as I am. The state has set aside programs, training, and loans for us young fishermen to replace the old timers. But lately we have been struggling to make ends meet. I am here to support Alaska's Hatchery Program and the Impacts of Prince William Sound Aquaculture Corporation (PWSAC). Im also in support of CDFUs fight to secure fair accountability of the personal user fishery in Chitina.

Im in support of proposal 6 because inseason reporting is the only accurate way to measure any means of harvest. I am in support of proposal 7 because subsistence fisheries should never be mixed with guide fisheries. I am in support of proposal 8 because we need to have adequate returns for the little streams. I am in support of proposals 9,10, and 11 because our spawning grounds need protection. I am in support of proposals 14 and 15 because we needs kings to stay healthy in the rivers, when not being retained. I also support proposals 17, 19, and 20.

I oppose proposal 18 because boats already cause damage to the spawning grounds as is. I oppose proposal 21 as well.

The livelihoods of hundreds of young fishermen depend on these proposals. I hope the board can take this into account.



Submitted By
Mark E Buchner
Submitted On
1/15/2021 8:14:42 AM
Affiliation

Phone
5416477600
Email
nerka@bendcable.com
Address
P.O.Box 7819
Bend, Oregon 97708

I have been to numerous board of fish meeting for PWS since the late 1980's. You need to understand that the reason for in-person meetings is to instill the nuances of the people and the stake holders of the areas you are meeting for. This will not happen through a computer screen. You need to meet in person face-to-face with the people affected by the proposals you are considering. I have already purchased a plane ticket to arrive in Cordova on March 20th so that I can attend these meetings. I want to meet you guys in person as do all the other stake holders. I want and need to look you in the eye when I give my 3 minutes on the podium of what I believe is important., just like I have done in the past. You cannot get the feel of what is happening through a computer screen. Either go through with the planned meeting or change the dates and or cycle.

On another note, this board is not legitimate. You have members who have not been confirmed so every proposal you rule on will result in a position that is not binding and will result in numerous legal actions. You have someone on this board who has never been to a Board of Fish meeting and you think this is fair and balanced? You should wait for legislative confirmation of all board members then reschedule at a time when all stake holders and interested people can attend. Thank you for letting me speak my opinion. Mark Buchner PWS fisherman.



Submitted By
Mark Palmer
Submitted On
11/13/2021 4:53:03 AM
Affiliation
Processor

Phone
2067695634

Email
mark.palmer@obiseafoods.com

Address
7947 Lake Alice Rd SE
Fall City, Washington 98024

I am writing in regard to the Prince William Sound Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Prince William Sound Aquaculture Corporation (PWSAC) and Valdez Fisheries Development Association (VFDA). I call on the Board of Fisheries to reject Proposals 49 – 55 due to the damage they would inflict on salmon fisheries across the southcentral region and the decreased hatchery production that would result if these proposals were implemented.

OBI Seafoods operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in Alaska seafood processing. Sustainable salmon stocks are the single most important issue to the long-term viability of our company.

For this reason, we have always supported a science-based approach to fisheries management. The Alaska Department of Fish & Game is second to none in applying scientifically collected data to determine the optimal hatchery contribution toward insuring maximum sustainable yield.

In the early 2000's under Gov. Frank Murkowski, the State of Alaska, through the salmon revitalize plan, partnered with industry to create more value-added products, jobs, capacity and higher utilization of the salmon resource. This program sparked millions of dollars of private investment and brought an industry back from the brink of collapse to the global competitor it is today. In other words: It worked.

The single most important part to maintaining our industry and its contributions to the state economy is a reliable source of salmon.

Alaska created the Fisheries Rehabilitation Enhancement Division within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created, allowing for the application of hatchery permits by Alaskans. Prince William Sound Aquaculture Corporation (PWSAC) was founded in 1974 and Valdez Fisheries Development Association (VFDA) was founded in 1980 – both as private nonprofit entities to benefit the Prince William Sound region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. Our fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The PWSAC and VFDA hatcheries are important infrastructure in the region and benefits the communities, economy, and harvesters.

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Prince William Sound (PWS) harvests of hatchery salmon generate approximately \$69 million in ex-vessel value. Additionally, Prince William Sound hatcheries support 2,200 jobs, provide \$100 million in labor income, and result in \$315 million in annual output overall.*

Prince William Sound Aquaculture Corporation and Valdez Fisheries Development Association together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Cordova, Valdez, Whittier, Tatitlek, Chenega, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard-hitting during years of low returns.

If approved, Proposals 49 - 53 would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries. These proposals would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

The concerns of proposals 54 and 55 were addressed by the Board of Fisheries through the submittal of an Emergency Petition and ACR's in 2018 to prevent the increase of 20 million pink salmon eggs for production in Prince William Sound. These actions were rejected by the Board of Fisheries because they did not meet the criteria for emergency action.

Thank you for your consideration. Please oppose Proposals 49 - 55 at the upcoming Board of Fisheries meeting in **science as the basis of our fisheries management in Alaska.**



PC148
2 of 2

Thank you,

Mark Palmer

President/CEO

OBI Seafoods, LLC

Submitted By
Mark Roodbeen
Submitted On
1/29/2021 4:36:41 PM
Affiliation



PC149
1 of 1

~Any chance to increase the sport fishing limit on rockfish for 2021?

There was limited sport fishing in 2020 due to Covid and it appears 2021 may well have limited pressure also.



Submitted By
MARK SPENCER
Submitted On
11/8/2021 2:02:29 PM
Affiliation
AK eXpeditions

Phone
2489106103
Email
maspencer73@mac.com
Address
9440 Arlene Dr
Anchorage, Alaska 99502

Proposal 6 - Oppose! Reporting as of now works fine and requiring 3 day reporting impacts travel plans because of lack of internet access in the area and will reduce tourism opportunities for local businesses.

Proposal 7 - Strongly Oppose! Banning guide services will prevent access to thousands of users who do not own a boat or do not wish stand on slippery rocks or wade into the fast current to try and catch fish. Properly licensed and vetted Guide services provide safe access to residents who would otherwise be unable to participate.

Proposal 8 - Oppose! Language is too vague and would restrict access to the Personal Use and Subsistence Fishery at the Bridge, O'Brian Creek, Terral Creek, Eskaleta Creek and Haley Creek. All of these drainages are popular access points for users.

Proposal 9 - Oppose! Language is too vague and would restrict access to the Subsistence Fishery at the Bridge.

Proposal 10 - Strongly Oppose! This proposal lacks common sense and would effectively force everyone to Dipnet from the shore leaving the dip netter to stand on slippery rocks or wade into the river. This puts users at undo risk.

Proposal 11 - Strongly Oppose! This proposal would like all boaters who navigate their boats into the canyon to only tie off to the canyon walls or shore. As a professional mariner I feel that forcing lay people to navigate their boats into very sketchy currents is a receipt for disaster and puts undue risk to the fisherman and their passengers.

Proposal 12- Strongly Oppose! There are a few places in the PU fishery that this interaction occurs. There are only a handful of locations to safely Dipnet from a boat in the PU where as there are nearly 20 miles of river bank for people who wish to Dipnet from shore. Boats and canyon wall Dipnetters can co-exist with no apparent impact on fishing success from either user. Dipnetters who waded into the water in the same drift as boats are putting themselves at risk and present a hazard to navigation. By pushing out 30-40' poles these folks run their nets under the running gear of the boats presenting a possibility of fouling the motor and setting the vessel dead adrift creating a safety hazard for the captain and crew.

Proposal 13 - Strongly Oppose! Fish wheels are stationary hazards that boats avoid. By limiting navigation near fish wheels the proposal could eliminate access to the entire length of the Kotsina flood plain just above the bridge forcing everyone to fish across the river on the West Bank of the Copper. One person's "too close for comfort" is not another's. Data needs to be provided that demonstrates actual accidental contact or fowling of Dipnet gear from a boat with a Fishwheel. The hazard lies with the boat operator who could expect to capsize on contact with a wheel and thus can navigate around this hazard with this knowledge. Whether it's a Fishwheel operator who drives a boat to their wheel or a dipnetter, the boat is only a momentary sound that quickly passes and does not impact fishing success. If it did the Fishwheel operator would not run a boat near their wheel.

Proposal 14 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings can be removed from a Dipnet quickly.



Proposal 15 - Strongly Oppose! King salmon do not get "gilled" in the current allowable gear. With practice, kings a Dipnet quickly.

Proposal 16 - Strongly Oppose! The use of sonar while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, aerial spotters and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more an aide to navigation than to find fish.

The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structures unseen without the use of sonar. "Drifts" as we call them are only done in a handful of locations in the Personal Use and Subsistence Fisheries. This is in large part because the depth is shallow enough and significantly free of snags that allows dipnetters to drag their nets at the bottom without snagging. Debris such as logs and broken fishwheels get pushed down river resulting in a constant risk of fouling and the sonar plays a pivotal role in avoiding these hazards.

In discussing this proposal with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage, he stated *"while it's rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied."*

Proposal 17 - Strongly Oppose! This proposal restricts the method of take by putting a penalty on a safer more time effective method of take and an additional burden on the user to obtain multiple permits and additional reporting.

Proposal 18 - Strongly Support! This proposal offers a reduction in congestion along the lower limit of the fishery. On busy days this area can be considered high risk for navigation due in large part to the number of vessels in this short drift. The longer drift would allow for a more orderly drift with allowing greater spacing between boats. Though the PU fishery is nearly 9 miles long, there are less than 1000 yards of viable drifts due to depth, snags, current and debris that impact the safety of the boat and crew. This addition, though incrementally small, adds a drift that is safe to navigate.

This drift is only available once the water level is high enough to flow over the gravel bar allowing navigation along this bank thus reducing its overall use to high water conditions.

Proposal 19 - Strongly Oppose! In years of low abundance, the resource should be allocated to Alaskan Residents and not sold to markets as a luxury food item.

Proposal 20 - Strongly Oppose! In years of low abundance, dipnetting yields low success and low success yields low pressure, but for those who want to slug it out should be able to do so within the current possession limits. Additionally, by lowering the limit it becomes less cost effective to travel to the fishery from anywhere other than the communities in the Basin.

Proposal 21 - Support! In recent years fish have come late so opening up a season earlier would make little difference as the fishing pressure would be low as would the success rates.

Proposal 22 - Support!