



December 22, 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 Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I participate in the commercial and sport salmon fisheries of the Southeast region. I am a former Board member SERPT, former Board member/president of SSRAA, and former Board member AFDF. I have been working in the SE salmon fishery continuously since 1973.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

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. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast 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. The 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 SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI 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, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.



Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.

SSRAA, NSRAA, DIPAC, and AKI 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 Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

David Street
DAVSTRE3@AOL.COM
(206) 915-4087



Marit Carlson Van Dort, Chairman
Alaska Board of Fisheries
1255 W. 8th Street
Juneau, AK 99811-5526

Re: King Salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

Tanaku Lodge has been in business since 1983. We have owned the business the last 29 years. We open mid-May through mid-September. We are a small family-owned business and take up to 24 people weekly. The largest demand in our area from our clients is King Salmon along with halibut. Each year King Salmon is the number one request when potential clients are coming to Alaska. King Salmon are vital to our survival.

I am one of the owners in Tanaku Lodge located in Elfin Cove, AK. We employ around 21-22 people each season. We are their main income for the year. We help the local float plane operators stay in business both Ward Air and Alaska Seaplanes. We order supplies from Juneau and keep many suppliers in business. Our clients spend two to three nights in Juneau providing revenue to restaurants, hotels, and shops.

I am in favor of SEAGO's proposal number 83.

When we have in season closures, we confuse our clients. They have booked assuming that they will be able to retain a King Salmon buy the stamp on line and when its closed they have to ask for a refund from the state. Obviously, they are a disappointed client expecting to take home a King Salmon or two. I do support keeping resident access open.

It is much easier knowing the regulations up front when potential clients are booking their trips. That way we can deliver on the client's expectations.

We all agree that we should share the resources and keep King Salmon a viable resource for the state.

Sincerely,

Dennis Meier
Tanaku Lodge
PO Box 72
Elfin Cove, AK 99825

Submitted By
Dennis Watson
Submitted On
12/22/2021 2:46:11 PM
Affiliation
Commercial Fisherman



PC103
1 of 2

2022 Board of Fisheries testimony.

A little background on myself first: I have been a resident Southeast Alaska commercial salmon fisherman for 48 years. I own and operate a 44ft commercial salmon troller and fish primarily in the Noyes Island area on the west coast of Prince of Wales Island.

Proposal 80: Support, only if harvest ceiling overages are assigned to the fishery or fisheries that exceeded annual allocation.

Proposal 81: Support, only if harvest ceiling overages are assigned to the fishery or fisheries that exceeded annual allocation.

Proposal 83: oppose.

Proposal 84: No comment.

Proposal 85: Support, only if harvest ceiling overages are assigned to the fishery or fisheries that exceeded annual allocation.

Proposal 86: No comment.

Proposal 87: No comment.

Proposal 88: No comment.

Proposal 89: No comment.

Proposal 90: No comment.

Proposal 91: No comment.

Proposal 92: Support.

Proposal 93: No comment.

Proposal 94: No comment.



Enhancement and special harvests areas:

Proposal 105: Oppose, at the very least this proposal is premature. The Port Saint Nicholas chinook (PSN) project is an exceedingly small fishery with a small return and a very small capture area. There is considerable conflict between the current users of this resource, trollers and sportfishermen, and concern about how cost recovery could be accomplished without disrupting the fishery. The addition of two new gear types to the PSN harvest area would only exacerbate the existing issues and create concern about additional capture of Treaty chinook and other salmon species bound for local systems. If SSRAA, as they have spoken of, increases chinook production at PSN it would be three or four years before the benefits of the increase would be realized. This would allow the existing issues to be addressed and SSRAA could resubmit proposal 105 in the next Board cycle, and still see its benefits. In addition it would allow the SSRAA Board to engage in a meaningful discussion about the PSN project with the historical harvesters in the PSN area (Craig and Klawock residents), this has been lacking up to this point. Also, it's important to remember that trollers lost 4 to 6 weeks of access to Southeast hatchery chinook stocks when the tail end of the winter chinook fishery was shut down to protect Southeast chinook stocks of concern. At least that much more access was lost when the expanded harvest areas in the Southeast spring hatchery chinook fishery were closed to protect the SOC stocks. The addition of 2 more gear groups harvesting PSN chinook at the current rate of returning fish would have a negative impact on the viability of this fishery, and further deprive trollers the benefits of Southeast Alaska hatchery chinook.

Proposal 106: oppose.



Submitted By
Derek Thynes
Submitted On
12/20/2021 6:16:07 PM
Affiliation

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Address
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Petersburg Ak, Alaska 99833

Opposed to proposal 208

I am opposed to shutting down more dungeness grounds to commercial harvest .
I have crabbed kassan bay since 1997 and have seen 2 major areas closed, Hollis bay and

Harris river area the most devastating for me being Hollis bay . In the time I've been in the area I have only seen 2 personal use pots I the Harris area.

Proposed area to be closed would be back breaking. The proposal shuts down Brown cove, Mills bay and Salt chuck. This area holds 1/2 or more of the commercial pots set in district 2 and 1/2 or more of the total district 2 crab catch. This is no small area as far as crab biomass.

There is more than enough opportunity to fulfill subsistent needs in kassan with the 2 closed areas and a closed summer season. Shutting down areas to commercial harvest isn't the answer this country needs less of that a better way is adopting the proven lower 48 method of a smaller size limit for personal use.this would give opportunity in the few months that commercial sized crab are scarce.



Submitted By
Devon
Submitted On
11/3/2021 12:47:28 PM
Affiliation

Phone
541-408-2549
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devoncalvin@gmail.com
Address
504 Shennett St.
Sitka, Alaska 99835

I have lived and fished in Alaska for 5 years. As a commercial salmon fisherman, I have a first hand account of the importance of herring to commercially valuable salmon fisheries. A robust biomass of forage fish is absolutely critical to sustain wild king salmon, whose populations on seven rivers has been listed or proposed for listing as Stocks of Management Concern. Furthermore, herring and herring eggs on branches are a traditional food source for Tlingit people, and should therefore receive a subsistence priority over any commercial sac roe fishery. It is my hope that the herring which have been spawning en masse in Sitka Sound for thousands of years not continue to be managed as a depleted resource, and overfished by only fifty sac-roë seine permit holders. For all of these reasons I strongly support proposals 156, 157, 158 and I oppose proposals 159, 160, 161, 163, 164, and 165.

Thank you, Devon Calvin

F/V I Gotta

F/V Morning Mist



Submitted By
Devon Calvin
Submitted On
12/22/2021 7:56:58 PM
Affiliation

Phone
541-408-2549
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devoncalvin@gmail.com
Address
504 Shennett St.
Sitka, Alaska 99835

Dear members of the Board of Fish,

I have lived in Sitka for three years, mostly working on commercial fishing boats. As a deckhand I clean salmon, and pay a great deal of attention to the contents of what these fish are eating, because this influences where and how we fish, and what kind of gear we use. I haven't been alive or fishing long enough to draw conclusions about herring or king salmon stocks based on my own personal experience, so I listen to what elder fisherman are saying: that large wild king salmon used to be much more abundant; their bellies full of herring. I listen to tribal oral history; that vast schools of herring have disappeared from all the places they used to congregate, especially in Sitka Sound. I watch the ocean surface for boiling herring, the sky for a swirl of birds, and the fish finder for any kings working the fringes of the school. I read testimonials from Alaska Trollers Association representatives, before legislation in 1939 was passed that closed the commercial herring fishery other than for bait purposes. Fishermen knew something then that we have seem to have forgotten now, which is that if we want to conserve the king salmon we must protect the herring. As troller Anton Simonson aptly stated in 1936, "we cannot talk king salmon without talking herring, because herring is the principal food of king salmon. It is common knowledge among trollers in southeastern Alaska that where there are no herring to be found there are no salmon to be caught".

What then, is the future of salmon fisheries, if we exhaust their food base? Will we continue to manufacture millions of salmon, and release them into the north pacific ecosystem only for them to starve? It was merely 40 years ago that the second (Kah Shakes) and third (Auke Bay/Lynn Canal) largest herring biomasses collapsed due to overfishing. I am deeply concerned that continuing to overfish the herring in Sitka Sound, a vastly depleted resource, will lead to similar tragic outcomes for the salmon, the birds, the forests, and the people who call this place home.

I am writing today in support of proposals 156, 157, and 158, which would lead to safer, adaptive management of one of the last vibrant herring populations in Southeast Alaska. Proposal 156 seeks to scale down the commercial harvest rate, creating more of a buffer for herring in lean years. Proposal 157 and 158 should be supported because of the growing consensus of the importance of older fish for population resilience.

I am strongly opposed to proposal 159, 160, and 161. Proposal 159 repeals a crucial regulation that supports the subsistence priority, directing the board of fish to provide a reasonable opportunity for subsistence uses of herring eggs first, before providing for commercial uses. This regulation guarantees that indigenous people can continue to practice subsistence, without their food resources being jeopardized by the commercial fishery. I oppose proposals 160 and 161 because they would create barriers and reduce opportunities to harvest the amount necessary for subsistence. As it is, subsistence harvest needs for herring eggs on branches have not been met in eight out of the last ten years (Sitka Tribe of Alaska).

I hope that the board of fish examine not just the content of each proposal, but also the intent of each one. Though it seems fisheries managers will try to do everything they can to maintain objective neutrality over value- laden decisions, we live in a subjective reality in which the decision to support or oppose a fisheries proposal can have significant repercussions throughout the food web. I also hope that we can listen to the small-scale fishermen, the subsistence harvesters, and most importantly of all, the native people who have lived here and practiced *yaa at woone* (respect for nature) since time immemorial.

Submitted By
Diana
Submitted On
11/21/2021 12:24:36 PM
Affiliation
SEAHRC



PC106
1 of 1

Hello,

I am a Sitka resident and parent writing to you today to ask you to support STA's proposals 156, 157, and 158 and to oppose proposals 159, 160, 161, 163, 164, and 165. The measures included in 156, 157, and 158 that make changes to herring quotas and protect older fish are crucial for protecting the herring population. By protecting the herring population we are supporting indigenous people, strengthening the health of our coastal communities, protecting the health of wildlife within our waters, respecting traditional ecological knowledge, and upholding our responsibilities as stewards of these lands. Further, we are protecting the safety, security, and health of our future generations, so I also write to you on behalf of my infant daughter and the other children of southeast Alaska.

Thank you for honoring the strength and well being of my southeast Alaskan community through your support of these proposals.

Diana Brooks



December 22, 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 Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Petersburg, Alaska, and I participate in the subsistence, commercial, sport, and public use salmon fisheries of the Southeast region. I own a Hand Troll permit; I have been in my community for 10 plus years and in Alaska for 20 plus. With Thomas Bay Chum coming online, this helps with opportunity for commercial, charter and sport. We are a subsistence family and depend on fishing for over 70% of our winter food.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

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. The 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 SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI 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, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.

SSRAA, NSRAA, DIPAC, and AKI 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 Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Don Spigelmyre
spigelmyred@gmail.com
(907) 518-4343

Submitted By
Donald hernandez
Submitted On
12/21/2021 5:12:29 PM
Affiliation
Point Baker Community Association



PC108
1 of 1

The Point Baker Community Association represents the residents of Pt. Baker in all matters relating to their health and well being. As a fishing and subsistence dependent community we have for many years been very concerned with the conservation of herring stocks in Southeast Alaska. That is why at a meeting of our association on Monday December 20th we voted unanimously to support proposals 156, 157, and 158 put forward by the Sitka tribe of Alaska.



Submitted By
Doug Rhodes
Submitted On
12/17/2021 2:05:37 PM
Affiliation
Self

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nakwasina@gmail.com

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PO BOX 180444
Coffman Cove, Alaska 99918

Proposal 121-

I am opposed to Proposal 121 for many reasons. 1- The East POW Advisory Committee has voted down their own proposal and therefore should not be considered by the board. 2. Gillnetters, skiff rental operators, lodge operators and most private boat owners have been educated on how to avoid conflicts with gillnets and signs have been posted that were purchased and designed in conjunction with gillnetters and private boat owners. 3. The Lat Long lines written in the proposal are not what the East POW Advisory Committee even talked about and include a much larger area than originally proposed. 4. Few if any people in Coffman Cove and no Commercial Gillnetters were contacted prior to this proposal being written and no Commercial Fisherman were on the East POW Advisory committee at the time this proposal was written.

I urge the Board to no spend any more of your valuable time dealing with a proposal that is not supported by any group or the residents of Coffman Cove or the AC that wrote the proposal.

Thank You

Doug Rhodes

Box 18044

Coffman Cove, Alaska 99918



Submitted By
Doug Rhodes
Submitted On
12/17/2021 2:23:01 PM
Affiliation

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Address
PO BOX 18044
Coffman Cove, Alaska 99918

Board of Fisheries Members:

I am opposed to proposal 113. I have been a commercial gillnetter in District 6 and 8 for over 30 years fishing out of Coffman Cove. I believe the current mesh restriction language during emergency order the department currently has is more than sufficient to ensure escapement yet allow for gillnet fishing to take place.

The wording in proposal 113 could have a detrimental impact on the chum fishery in district 6 and 8 if the maximum gillnet size was reduced to 51/4 inches.

Again, I am opposed to proposal 113.

Doug Rhodes



Submitted By
Doug
Submitted On
12/22/2021 9:27:55 PM
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Self

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Box 18044
Coffman Cove, Alaska 99921

Proposal 277

Dear Board of Fish Members-

I support proposal 277 option one which would align the non resident boat rental fisherman halibut limits with the non resident charter client limit. As a commercial halibut fisherman that has seen my quota share decline over 70 percent over the years, I feel we need to be proactive and reduce the halibut catch from the non resident unguided boat rental sector.

Since the implementation of the IFQ program we have limited the amount of halibut charter boats in 2-C, and



Submitted By
Doug Rhodes
Submitted On
12/22/2021 9:51:59 PM
Affiliation
Self

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Box 18044
Coffman Cove, Alaska 99921

Support proposal 277

Dear Board of Fish Members-

I support proposal 277 option one which would align the non resident boat rental halibut limits with the non resident charter halibut limits in area 2-C. I am a commercial haibut fisherman in area 2-C and have seen my quota share reduced by over 70 percent over the past 30 years. I know that there are many reasons for this reduction, but my point is that we have made concessions to keep our halibut stocks healthy.

We have also seen reductions to the charter halibut limits in order to reduce catches and limited entry was imposed on the fleet some years ago as well. There is no question that these restrictions have helped us conserve our halibut stocks for all Alaskans- be it commercial, charter, sport and subsistence.

However, since limited entry was imposed on the charter fleet, we have seen a dramatic increase in skiff and boat rentals to non residents. If a non resident goes out fishing on a charter boat he has a slot size limit and a one fish limit, but if that same non resident goes out on a rental boat, he has a 2 fish limit and no slot size limit. Many people will charter for one day to find out how to fish and then go out after that with a rental to catch twice as many fish with no size limit.

I have seen an exponential increase in rental boats fishing the waters of Clarence Strait and on the outside Prince of Wales coast over the past several years and it is time to address this issue Southeast wide. Aligning the non resident limits on halibut will be a fair and equitable way to ensure the health of our halibut stocks.



Douglas Island Pink and Chum, Inc.

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

Alaska Dept. of Fish and Game
Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
Submitted via Email: dfg.bof.comments@alaska.gov

December 14, 2021

Members of the Alaska Board of Fisheries,

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit hatchery corporation based out of Juneau, Alaska. The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.

DIPAC opposes proposals 101 & 103.

Alaska's hatcheries have operated with substantial Department of Fish and Game (ADF&G) oversight and public participation for over 40 years. Hatchery production has been stable for over 30 years, and there is no need to interrupt these successful programs. The hatchery operators have been working closely with ADF&G, members of the public, and the greater scientific community to better understand the impacts of these enhancement programs for the entirety of their existence. ADF&G already takes into account many of the concerns raised by both of these proposals in how hatcheries are permitted and how hatchery returns are managed. If either of these proposals were to pass, it could lead to significant negative impacts on fishing opportunity for all user groups, communities, and stakeholders where hatchery raised salmon are harvested.

Respectfully,

Katie Harms
Executive Director - DIPAC



Submitted By
Drew Larson
Submitted On
12/21/2021 6:44:02 PM
Affiliation

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2182806637

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Address
307 Lake St.
Sitka , Alaska 99835

I am writing today to support Proposals 156, 157 and 158 which would lead to safer management of the herring sac roe fishery in Sitka Sound by protecting population resilience while doing less harm to subsistence roe on branch harvest. These proposals have been put forward by the Sitka Tribe of Alaska. It is important, now and always to listen to indigenous people and traditional ecological knowledge when managing fisheries. I oppose proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and ignore modern and traditional traditional Tlingit knowledge. These proposals and current herring sac roe fisheries management run the risk of further damaging and reducing herring populations. Furthermore I believe that none of these proposals go far enough to advancing stewardship and protecting the herring for generations to come. As we have seen current herring management has the potential to deplete the herring stock and therefore the whole productivity of our Southeast Alaska ecosystem and salmon fisheries. There used to be many different sac roe herring fisheries in SE but then all of those stocks were depleted. We need to do all we can to protect the Sitka Sound herring stock. This starts by supporting proposals 156, 157 and 158 and incorporating modern and traditional Tlingit and ecological info management decisions.



Submitted By
Eleanor Lo Re
Submitted On
12/22/2021 10:01:30 PM
Affiliation

Phone
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Ellielore@gmail.com
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700 Etolin St
Sitka , Alaska 99835

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Though I did not grow up living in and surviving off the land in Sitka, as many do and have done since time immemorial, I have already seen the magic of herring eggs. One of the first times I felt welcomed in Sitka was when a neighbor who had harvest herring eggs the year before, and frozen them, shared them with me at a table over laughs and smiles. For some, herring eggs are more than a symbol of hospitality, they are life itself. By supporting proposals 156, 157, and 158 YOU have the ability to support the life of those who have cared for herring eggs for the last thousands of years and who have an intimate knowledge of their importance. By opposing proposals 159, 160, 161, 163, 164, 165, and 166 YOU can chose life over death and support sustainable harvesting of herring eggs.

Submitted By
Eleya Rosenthal
Submitted On
12/22/2021 1:29:08 PM
Affiliation



PC113
1 of 1

Hello,

I would like to submit a comment to the Board of Fish as a community member in Sitka who loves to fish and respects the right of everyone to access our natural resources in a responsible and sustainable way.

I am in support of proposals 156, 157, and 158, which would lead to a safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring generations to come.

Thank you for the opportunity to make my voice heard.

Respectfully,

Eleya Rosenthal



Submitted By
Eli Evans
Submitted On
12/22/2021 11:59:02 PM
Affiliation

Phone
9713372656

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elizabeth.q.evans@gmail.com

Address
66665 Fry Court
Homer, Alaska 99603

Hello,

My name is Eli Evans. I am a lifelong Alaskan resident and I lived in Sitka up until a year ago. From living in Sitka, I know that the herring are an integral part of Sitka life and specifically a cornerstone species for so many animals in the southeast Alaska marine ecosystem web. Furthermore, the herring are the life force of the Tlingit, Tsimshian, and Haida people who have called the Tongass rainforest and waters home for more than 10,000 years. If you listen to the elders' stories about the herring harvest dramatic decline over the past century, then you will know that you need to protect the herring.

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Gunalcheesh

Eli Evans

Submitted By
Elizabeth Egan
Submitted On
12/14/2021 2:45:30 AM
Affiliation



PC115
1 of 1

I support the Sitka Sitka Tribe's proposals 156 157 158. Herring need time to regenerate. Listen to the Tribe and listen to science. Anything else is just greed and ignorance.

Submitted By
Elizabeth Leonard
Submitted On
12/22/2021 6:58:46 PM
Affiliation



PC116
1 of 1

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Submitted By
Elsa Sebastian
Submitted On
12/22/2021 7:00:07 PM
Affiliation



PC117
1 of 1

I am a second generation commercial fisherman; I captained a troller in Southeast AK for 6 years, and deck-handed in Bristol Bay for another 6. I'm in my early thirties, and part of a generation of commercial fishermen who are facing climate change, warming oceans, and ocean acidification. Here in Southeast Alaska, king salmon stocks are struggling due to marine survival, and meanwhile, salmon spawning habitat is being threatened by development of transboundary mines. Protecting forage fish is more critical than ever.

I'm writing today about the management of the Sitka herring fishery. In my opinion, there shouldn't be any large-scale commercial fisheries on forage fish, and at the very least, commercial fisheries on forage fish should managed very conservatively. When I talk to other young fishermen, especially here in Sitka, the pressure on forage fish is a commonly cited concern. Around Southeast Alaska herring stocks have collapsed or declined significantly. Sitka is still relatively abundant, and presumably diverse. We need to be precautionary with our management of forage fish, they're worth more left in the water, and perhaps conservation of forage fish is the cheapest way to build resiliency into the marine ecosystem.

I support proposals 156, 157, and 158, which would help protect the resilience of herring populations, and limit pressure on older age classes of herring

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which will only elevate the risk to herring populations and are disrespectful of subsistence users and Tlingit people.

Thanks for your time and decision-making,

Elsa Sebastian

Submitted By
Emma Thompson
Submitted On
12/22/2021 8:19:03 AM
Affiliation



PC118
1 of 1

I am writing in support of commercial herring fishery management in Sitka Sound that is safe and promotes population resilience while reducing harm to subsistence roe-on-branch harvest. I support proposals 156, 157, and 158 for this reason.

I oppose proposals 159, 160, 161, 163, 164 and 165, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Respectful stewardship and protecting the herring for generations to come should be a priority.



Submitted By
Eric and Sarah Jordan
Submitted On
12/22/2021 4:13:54 PM
Affiliation

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9077476743
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chumtroller@gmail.com
Address
103 Gibson Place
Sitka, Alaska 99835

Alaska Board Of Fisheries Comments for January Fin fish Meeting January 2022 Dear BOF members,

My name is Eric Jordan. I am a 72 year resident of SE Alaska. I was born in Wrangell in 1949 and was taken salmon trolling on my parents 32 foot troller "Salty" 5 months later. I have been commercial, sport, and subsistence fishing ever since. I became involved in Alaska fisheries politics in the 50's listening to my father discuss and prepare speeches on better managing or eliminating salmon traps, the herring reduction seine fishery, and halibut management. I have lived and fished in SE from Yakutat to Ketchikan. I have been involved directly in fisheries and conservation politics since the early 70's. I have been appointed to or elected to numerous groups and regulatory bodies including the Sitka Fish & Game Advisory Committee (45 years), NPFMC AP (8) BOF (9 months) SE RAC to the Federal Subsistence Board (3) and Sitka Conservation Society (20). I helped found and am a troll rep on the NSRAA Board. I helped found and worked 6 years part time for the Alaska Marine Conservation Council. My grandfather hand trolled in Alaska and my sons fish commercially and my granddaughters and grandsons have been fishing and I plan to take them again. I am a National Fisherman Magazine Highliner and have been recognized for Excellence in Service by the BOF for my work on the Sitka Advisory Committee.

I write this introduction to you because I will not be in Ketchikan and because I usually know BOF members and attend SE meetings personally and know how important our histories are as we consider each other's perspectives. While I have participated in numerous meetings this fall with interest groups and as an AC member my comments here are my own. Because my perspectives are largely reflected in our Sitka AC positions and comments, plus the extensive and detailed comments of my good friend Tad Fujioka, and John Murray, I have limited my personal comments to those where I believe my comments will add a unique perspective to your understanding of the issues around the proposals.

Proposal 82

SUPPORT *As amended by the SF&GAC.* As a long time fishery conservationist activist, especially regarding king salmon, and as a salmon troller and resident king salmon sport fisherman, it is important to me that we do everything needed to conserve and rebuild our stocks of concern. And that the largely resident troll fishery and resident sport king salmon fisheries be protected from the ever growing demands of the largely non-resident guided and emerging bare boat rental fisheries. The AC amendments for this proposal which we worked diligently on protect residents. I oppose 82 if it is unamended as it does not provide the protection resident sport fishermen and trollers need if unamended. I support Tad Fujioka's analysis and comments and amendments to this proposal. □

Proposal 83

OPPOSE. I agree with the Staff comments*"This said, the department has concerns if*

actions are taken to reduce flexibility to achieve escapement goals of Alaska stocks during times of low abundance. The reallocation of Alaska's all-gear catch limit between user groups would need to be discussed within the Pacific Salmon Commission." I strongly support "in season management flexibility" and the Sitka AC comments on this allocative proposal which will benefit guided mostly non-residents at the expense of the largely resident troll fishery and Alaska resident sport fishermen. Catching king salmon to eat with rod and reel is basically our subsistence harvest method for SE king salmon.

Proposal 85

OPPOSE. I have discussed this proposal with a Territorial Sportsmen rep and am generally supportive so long as the amendments the Sitka AC recommends for 82, which strengthen protections for resident sport fishermen and trollers, are also included here.

Proposal 89

OPPOSE. As I predicted to the proposer, the Alaska Trollers Association, and others; this proposal has divided the troll fleet and generated a lot of passion for and against in troller FB threads. As trollers we are facing challenges from stocks of concern, to trawl by-catch, to growing non-resident guided and bare boat charter fisheries, to protection of Puget Sound Orcas. While I generally agree with the Staff comments and am glad they also oppose this proposal I don't think they have the **COST ANALYSIS** complete enough. The extra cost of buying a permit is just part of it. Many SE trollers are not set up to run 6 lines. 2 of my close partners do not have 3 spool gurdies on their vessels. Many trollers do not. Buying 3 spool gurdies in good operating condition costs thousands of dollars alone. Then there is the cost of wire line, float bags, leads and gear for the extra two lines. While I am presently well set up with 3 spool gurdies and poles that are rigged for 6 lines this change would cost me thousands to gear up and convert to 6 lines. Plus, it would likely cost those smaller vessels unable to afford or easily convert in loss production as the larger boats with more gear scoop up more of the coho. Plus, with larger boats and existing trollers competing to buy troll permits the costs of those permits would undoubtedly increase making it more difficult for younger crew and hand trollers to buy into the power troll fishery. My analysis, with all due



respect to the staff, is that this would result in “*significant extra cost for a private person to participate in this fishery*.” Please do not pass this proposal.

Proposal 90

SUPPORT I agree with the proposer. Good idea!

Proposal 91

OPPOSE In the early 90's after Winter troll harvest grew from the mid-20,000 range to over 70,000 kings, in part because of a proposal I introduced, our Sitka AC supported, and the BOF approved, to move the winter surf line boundary out. The ATA Board, which I was on, was considering asking the BOF to set a cap of 24,000 to 40,000 on the winter fishery. I, and many other Sitka and other SE trollers, could support a roll back of the expanded boundaries and cutting back the fishery to 50-60,000 but not to less than that. The ATA Board was closely divided on the issue with full time resident fishermen who fished year around largely opposed to rolling it back to 40,000 or less and part time summer trollers and non-resident trollers largely supportive of at least a 40,000 cap and roll back of the boundaries. I proposed that we form a “Troll Task Force” to address the issue and develop recommendations to the BOF. This passed the ATA Board and the famous troll task force that addressed this and other internal troll fleet allocations like the July-August king salmon split fishery goals was set up. While not on the task force, I did manage to get Mim McConnell from Port Alexander, and my partner Pat Wood onto the task force.

The task force settled on a compromise number of 45,000 GHL for winter kings, and rolling back the surf line to previous boundaries among other things such as a 70-30 split in the July- August summer troll king salmon retention seasons. As a long time king salmon conservationist I favor as many days as possible of king salmon retention in the summer season. More days in August with lower catch rates and many trollers targeting chums means less non-retention days on king salmon.

If the BOF wishes to enter into internal troll allocation issues by considering adopting internally controversial proposals like this and 6 line proposals then I suggest recommending another internal troll task force to address these issues.

Proposal 92

SUPPORT AS AMENDED BY TAD FUJIOKA AND THE SITKA AC.

I have worked with Tad Fujioka and the AC on amending the proposal. As a member of the NSRAA Board I have been involved in trying to optimize king salmon production and troll hatchery harvest for many years. It has been extremely frustrating to be returning 27 inch 2 ocean hatchery king salmon worth over \$100.00 to the water. These are chunky fine eating fish that are mostly male and not usually needed for broodstock. We should be harvesting these fish wherever and whenever the troll fishery is targeting hatchery king salmon in our spring (May and June) hatchery troll openings. I am not going to repeat Tad's excellent analysis and recommendations but I agree and support them enthusiastically. I support this amendment : *The minimum size limit for Chinook salmon in all troll areas during the spring season change from 28" overall to 26-1/2" from the snout to the fork of the tail.*

Proposal 101

OPPOSE.

A little history here. I helped found NSRAA in 1976-77 and was the second employee hired in the spring of 1977. My job was to help organize SE Alaska commercial salmon fishermen to vote for a 3% salmon enhancement tax to finance hatchery production and operations. In 1978 after a successful vote and Board of Directors organization during which I advocated for subsistence, conservation, and hand troll seats. I returned to my life long love of trolling salmon. I was then elected to represent hand trollers on the NSRAA Board which I did until I bought a power troll permit. I have served as a power troll board member for the last 9 years and am running unopposed for another 3 year term. In 1977 I was tasked to write language for the Alaska Wilderness Act legislation which permitted some aquaculture activities in Alaska wilderness. This language was included in the Act. I also supported Alaska Legislative action to provide the strongest wild salmon priorities in the world. And I nominated its champion, the late great Alaska State Senator, Richard Eliason, to the Wild Salmon Hall of Fame. In brief, I am a long time advocate for both salmon enhancement and wild salmon conservation and sustainability.

Since we founded NSRAA in 1977 we have built only 2 hatcheries. Both on the Sitka road system. And we have taken over the Hidden Falls hatchery from the State of Alaska and are rebuilding the Kake Hatchery. Hatchery development and management in Alaska are extremely conservative and have inhibited many potential projects. NSRAA and other SE hatchery programs spend considerable time and money monitoring straying and wild run health. I proposed and chaired the “New Facilities and Production Committee” for several years on the NSRAA Board. Basically we were so frustrated with ADF&G opposing our ideas for new production to the point that we asked them to suggest possible sites. The highly successful Crawfish Inlet chum and king salmon program is a result of their suggestion.

I listened to the BOF deliberations on similar proposals for PWS salmon enhancement programs. I strongly agree with the BOF actions there and recommend similar in SE Alaska on this and similar proposals.

Proposal 114

SUPPORT. I hand trolled and represented hand trollers for many years. I authored the proposal adopted by the BOF to require



immediately marking of salmon caught off a licensed troll vessel by removal of the dorsal fin. This minimizes people sport fishing with or without down riggers from a commercially licensed troll vessel from keeping and selling sport caught salmon whether from areas closed or open to commercial trolling. What I eventually would like to see is the ability for power trollers to use their gurdies as down riggers with sport rods when commercial fishing salmon in areas open to commercial salmon trolling as the use of small hooks and light leaders is often more effective targeting king and other salmon than the bigger hooks and heavier leaders necessitated by traditional power trolling gear.

Proposal 115

SUPPORT AS AMENDED BY THE SITKA AC

During the time of SOC reductions of the spring troll season this change recovers some of the valuable winter king harvest mostly targeted by Alaska resident trollers. Plus, it makes the October season consistent with the treaty weekly language. Please adopt.

116

OPPOSE. This is an unworkable proposal practically and would result in less value of troll king salmon harvest, increase days of non-retention in the troll fishery which would increase chinook mortality rather than decrease it.

117

Strongly OPPOSE. As a founder of and long time advocate for the modern chum troll fishery including founding the Chum Trollers Association I strongly oppose this proposal. This is an internally allocative proposal within the troll fleet and should be part of a troll task force proposal before adoption by the BOF. Our AC committee opposed this for good reasons.

Here are my concerns. Getting chums to bite troll gear is most often an extremely challenging and ever evolving experiment. It is no accident that trollers were not successful targeting this species for the first 100 or so years of trolling salmon. Highest production often involves targeting schools of jumping or submerged fish in tight bays and channels or among submerged pinnacles and bottom structure in currents and wind at troll speeds of 1-2 knots. Maneuverability around dozens of other trollers trying to target the same school or schools of fish can be extremely competitive and involve quick adjustments to speed, depth of wires, and sharp turns to stay on the fish and avoid other trollers. It is a completely different fishery than tacking 3-200 miles off shore west of Cape Spencer where 6 lines are allowed now.

I have spent hundreds of thousands of dollars to adapt my 36 foot power troller to this fishery. Included in those adjustments are a new engine, new propeller, rebuilt steering system with rudder and steering system to facilitate sharp turns both to get the chums to bite, avoid bottom structure, and navigate in crowded conditions. I have completely re-rigged my pole system to add bow poles, extend my main poles, and set the trolling blocks to maximize maneuverability without tangling at slow speeds in crowded conditions. Fishing chums with 4 lines I often deploy 100- 150 or more spreads (leaders with flashers and hooks) at a time. My gear setting system and storage for deployment, while one of the most advanced and ergonomic in the fleet, is pretty well taxed by 4 lines. Adding 2 lines will be expensive and require redesigning the gear deployment area. And I am better set up to adapt than many small trollers who prefer to avoid the often tough weather off shore by targeting chums.

And, as arguably the chum troller still actively fishing and a top producer with the longest experience targeting chums, which dates back to the 70's, and author of the most proposals adopted by the BOF affecting chum trolling, I respectfully disagree with the staff and others

that feel this proposal "would increase efficiency....." and "could assist in getting the troll fishery closer to their hatchery chum salmon allocation %.....". I think there is a reasonable chance that it could actually decrease our hatchery chum % in some of these areas as it reduces the maneuverability and effectiveness of some of the top producers.

But, that isn't my most important concern with this and the other 6 line proposal. My primary concerns are with the additional cost this puts on the smaller trollers to buy more gear, gurdies, and rigging to set up for 6 lines and the division within the troll fleet the 6 line proposals have created.

The troll fleet made good strides in improving its share of enhanced salmon last year due to a survival event in Sitka Sound and conservation closures on gill netters for SOC and seiners for pink salmon in the Eastern Channel and West Crawfish areas. The chums bit exceptionally well for trollers in both areas and did not school into as localized areas or into as tight schools as usual which made fishing a lot easier with a lot of boats to work around. It isn't that easy most years.

Also, some years the chums are more fickle than others. To maintain my level of competitiveness I have completely retooled flashers, wire marks, hooks, and terminal bugs multiple times. Which means, in my case for 4 lines, 20 dozen flashers at over \$10.00 a flasher and hundreds of lures and hooks at roughly \$1.00 apiece. I have arranged orders of thousands of flashers and bugs for volume discounts for chum trollers. Like I said earlier, I strongly disagree with the staff analysis that "Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery." *It will greatly add to my cost to participate in this fishery.*

I could go on for thousands of words. I see this as another big boat troller versus small boat troller internal allocation battle that will have unintended consequences and unless universally supported by the troll fleet should not be adopted by the BOF. It and the larger region wide 6 line proposal has already created hard feelings between many in the troll fleet. I wish the proposers had gone to ATA or the Chum Trollers Association or both and got consensus support before proposing.

Proposal 144

SUPPORT. We have an emerging and growing user group in the bare boat rental fisheries and their harvest needs to be documented like the existing commercial and guided sport fisheries are in SE Alaska. This problem was recognized in the early 90's, and I find it appalling



that the BOF and Sport fish division have not acted yet to address this problem. Our AC has been a leader in recognizing and leading in addressing emerging and existing fishery management and conservation concerns for decades. I support and helped in writing the letter from our committee addressing the staff comments on our proposal. My comment on this issue is that the growth of the largely non-resident guided sport and bare boat rental fisheries in SE Alaska are putting pressure on the resources and largely resident sport and commercial fisheries in the region. The BOF needs to protect existing fully allocated resources and their traditional users from collateral damage as these two growing groups increasingly try to increase their share from a fully allocated resource.

Proposal 2001

Oppose After talking to commercial and subsistence crabbers in the area it is clear to me that the existing closed area is sufficient for sport and subsistence crab now and crab fishing is better recently than it has been. Our Sitka AC ended up voting overwhelmingly against our own proposal after hearing from the public on this.

On the Northern SEAK King Salmon Stock Status & Action Plan, 2021 (RC6)

I strongly recommend the Dept. rewrite this plan along the lines of comments

from Tad Fujioka, ATA, and my friend John Murray.

The troll fleet and inside resident and non-resident sport fisheries are taking significant cuts to conserve king Salmon while the largely guided sport fisheries on the outside coasts of SE Alaska continue unrestricted. This is discriminatory toward inside sport and commercial fishermen for the benefit of the guided and bare boat rental fisheries in the outside waters. The action plan needs to be rewritten to reflect this inadequacy and lack of fairness. Something is wrong about tying up the largely resident troll fleet for 45 days in March and April and severely restricting our hatchery fisheries throughout the region in May and June while allowing the guided and bare boat rental fisheries to continue unabated on the outside coast from Pelican and Elfin Cove to Craig.

The BOF must direct the staff to re-write this plan to address the inequity in it.

Thank you for all you do BOF members and ADF&G staff. As a nearly 50 year participant in these processes and usually present for SE Board of Fish meetings I have great appreciation for the hours of work and dedication you bring to considering these important proposals and needed staff directives.

Thank you for reading my comments.

Eric Jordan

F/V I Gotta (907) 738-chum



December 22, 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 Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Sitka, Alaska, and I participate in the sport salmon fisheries of the Southeast region and as a guide. Salmon fishing in the Southeast region is important to me through subsistence and guiding.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

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. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast 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. The 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 SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI 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, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.



SSRAA, NSRAA, DIPAC, and AKI 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 Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Eric Morisky
sninky@mail.com
(907) 738-2764



Submitted By
Eric Morrison
Submitted On
12/22/2021 11:36:15 PM
Affiliation
Grand Camp Alaska Native Brotherhood

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I support resolutions 156, 157 and 158. Clearly this review has been biased for several years in that the herring has been managed by a branch of fish and game that is attuned only to measuring the harvest based on the economy of the harvest. Even the bait fishery or test fishery has been managed according to the economic needs of the department to achieve financial gains for the economic health of the department. There is no balance. Fish and game has a subsistence department and yet has never utilized this department to give an alternative view. Because the federal subsistence board became aligned to the rule of law for the federal subsistence regulations the state instead of negotiating regulations in line with the requirements of the Katie John case the state took steps to negate the rule of law by forming local committees based on citizens whose alignment and backgrounds lead to favoring commercial harvesting. After the recent federal court enforced subsistence harvest rights to the citizens of Kake who acted in opposition of state management it would seem evident that following the path of seeking maximum economic gain from harvesting of a forage fish that is essential not only to subsistence harvesters, but sports and other commercial fisherman whose health in harvesting of other fish such as salmon, halibut and cod that rely on this forage fish to ensure a food source. Herring is one of the foundations of health for the natural environment.

The other herring fishery in Togiak has achieved a healthy harvest by commercial and subsistence users alike because the herring stock is larger and they have developed a seine that will only harvest mature herring. The size of the herring in Sitka does not allow for this. Accordingly not only are males harvested but immature herring are harvested as well that further devastates the future of the stock.

Little if any research has been done to give a possible reasons for the lack of mature herring over the past several years. We all know at this point that only mature herring spawn. This committee needs to encourage the fostering of research to gain a better understanding of the low numbers of mature herring. Herring schools were plentiful all through southeast and and this time only Sitka has a marginally healthy stock. I pray that we do not reach the point like our neighbors in Canada, Washington and Oregon where sanctuaries are made for small locations where the herring return to spawn.

The studies in Sitka has shown the sensitivity of herring to economic development as well as overfishing. Because of airport development, port development and even the placing of storm drains has impacted the health and movement of the herring stock in sitka sound. I give you one example of a fatal mistake. It is known that there are different stock of herring in sitka sound and salisbury. Silver Bay in Sitka is a name derived from the fact that one stock was so abundant in silver bay so much so that when the herring arrived the bay developed a distinct silver hue. Sitka allowed a hatchery to develop in the area. When that happened the salmon fry that were released in the area began to feed on this plentiful herring harvest to the point today herring are essentially absent from this bay.

In conclusion this committee needs to encourage more research. Some years ago the tribes in southeast sought to develop a microhatchery to assist in the return of herring in areas that were plentiful but are now been negligible. This committee needs to support programs that will assist in bringing herring back to southeast. We all know that many stock of salmon, halibut and other wildlife rely on herring to maintain a healthy balance. Herring in our marine waters is equivelent to canaries in mines. When the canaries in the mine died the minors knew to leave the shafts. Without herring we cannot expect our balance in nature to continue with the onslaught of environmental and climate changes that are occuring in our beautiful state. Now is the time to take a step back and achieve a reasonable man's standard of what a healthy stock should be to ensure we can all enjoy Alaska as it should be. Reasoning should not stand on one foot of economy that is fleeting but should be formed by a firm foundation based on the continuation and health of the stock for all of us; humans, whales, seals, seal lions, salmon, halibut, cod, rock fish and yes even the big uglies.

Thank you for your kind consideration.

Submitted By
Ernest Manewal
Submitted On
12/18/2021 5:10:53 PM
Affiliation



PC122
1 of 1

"I have lived in Sitka for over 46 years, roughly half my life. I have always enjoyed the springtime return of herring. Whether photographing the abundance of wildlife returning to feast or enjoying herring eggs distributed by the tribe. It marks the change in season each year. I worry about the future of herring, as across Southeast and globally herring populations have crashed, in part due to overfishing, and perhaps other unknown reasons. Herring are a critical species for the wildlife in the area, everything in our sound depends on them.

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals go far enough to advance respectful stewardship and protect the herring for generations to come.

Thank you for your time,

Ernest Manewal

Submitted By
Esther Kennedy
Submitted On
12/22/2021 2:53:23 PM
Affiliation



PC123
1 of 1

Dear Alaska Board of Fisheries:

I am writing in support of proposals 156, 157, and 158 and in opposition to proposals 159, 160, 161, 163, 164, 165, and 166.

I am currently a graduate student at UC Davis studying ocean chemistry and fisheries management. Previously, I spent five years as an environmental scientist in Sitka and have seen first-hand how important the health of the herring population is to the environment, culture, and traditions of Sitka. I also grew up in Alaska and have sadly witnessed the catastrophic decline of several herring stocks, salmon stocks, and crab stocks in my lifetime, as well as the relentless advance of climate change and ocean acidification. In the face of all this decline, we need to reduce fishing pressure and take additional conservation measures. Conserving herring will pay dividends in higher-value fisheries like salmon and halibut, which both prey on herring, as well as in tourism dollars from whale watchers. Sac roe is less and less valuable, making this fishery increasingly wasteful both economically and ecologically. Herring populations are also vital to Tlingit culture, and should be respected as such.

Thank you very much for your time.



Submitted By
Evan p Norbistrath
Submitted On
12/19/2021 8:48:58 AM
Affiliation
s.p.c member alaska trollers association member

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3604605736

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Address
3725 south airport road
port angeles, Washington 98363

I support proposal 80 that requires individual user groups be responsible for their own overages, and I also support proposal [p144] that requires charters to submit logbooks



Submitted By
Evans Sparks jr
Submitted On
12/17/2021 9:34:42 AM
Affiliation

Phone
9077380273

Email
rip_curl_29350@hotmail.com

Address
101 Peace Lane
Sitka, Alaska 99835

To State Board of Fish and Game

My name is Evans Sparks. I am an Alaska native, born and raised in Sitka, Alaska where I still currently live and commercial fish and crab. I strongly oppose proposal 201. If this proposal was approved it would take away very valuable crabbing grounds that myself and local crabbers utilize. Pushing our crabbing grounds out farther away from Sitka is not in the best interest of anyone. Every area closed to commercial crabbing directly affects the entire southeast crab fishery when deciding the length of season. There are no conservation concerns with Dungeness crab stocks by ADF&G. Currently, Sitka has a large area much closer to our community that is closed during the summer for recreational crabbers. This area provides opportunities for recreational crabbers just like other areas around southeast Alaska communities. The process of which Proposal 201 was introduced and supported by Sitka AC was flawed. There was absolutely no contact or attempt to contact any of the local crabbers that are directly affected by Proposal 201.

Therefore, I ask you do not support Proposal 201.

Sincerely, Evans Sparks - F/V Sentry



December 22, 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 live in Valdez, Alaska, and I participate in the commercial salmon fisheries of the Southeast region. I'm a commercial fisherman and net builder. Salmon fishing in the Southeast region is critical to the overall global salmon market

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

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. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast 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. The 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 SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI 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, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.

SSRAA, NSRAA, DIPAC, and AKI 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 Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Evenn Moore
evennmoore87@gmail.com
(402) 450-2452

Submitted By
Fei Alexandra Ewald
Submitted On
11/16/2021 6:34:42 PM
Affiliation



PC127
1 of 1

I support proposals 156, 157, and 158 as a nature lover and cultural advocate of the Tlingit people.



Submitted By
Frank W. Warfel
Submitted On
12/21/2021 9:02:59 PM
Affiliation
Owner/Operator/Permit Owner

Hello Board Of Fish Members,

My name is Frank W. Warfel Jr. My vessel is the F/V Pacific Sea from Wrangell, Alaska. I am a born and raised Wrangellite as are all my crew. I am currently a G01A Sitka Sound commercial sac roe seine permit owner. Today, I am submitting a comment in full support of Proposal 163 and 164 to establish equal share quotas for the Sitka Sound sac roe herring purse seine fishery.

Over the existence of the Sitka Sound sac roe purse seine fishery there have been radical swings and changes from big quotas to small quotas, big prices and rock bottom "crap" prices, unmarketable fish to very desirable fish, spotter pilots fighting over air space, permit holders forming groups and creating "blocking" scenarios causing major safety hazards, to political tension between commercial harvestors and personal use participants. It is for all these reasons my father, Frank L. Warfel Sr.(F/V MRS), who was one of the original Sitka Sound sac roe seine permit owners, had enough and sold his permit in 1995.

Here we are, 26 years later, still fighting the same struggles with this fishery. Well now is our chance as permit holders and board of fish committee to create a tool to help remedy these issues by establishing an equal split fishery. The 2021 equal split harvest is proof on how well the concept works. It was safe, it was a DREAM for ADF&G to manage, catcher boats were able to harvest their fish not only safely but tender much of their own fish increasing vessel gross stocks, and the fishery was easily moved away from areas to avoid conflicts with personal use participants.

Please consider voting in favor of an equal split fishery for the reasons listed above and the reasons listed by Proposals 163 and 164. Thank you for your time.

Regards,

Frank W. Warfel

Permit Owner G01A644760

F/V Pacific Sea

Wrangell, Alaska



Submitted By
Gabe Winter
Submitted On
1/12/2021 2:18:05 PM
Affiliation

Phone
3604200932
Email
gabe_winter@hotmail.com
Address
PO Box 3044
Leavenworth, Washington 98826

To whom it may concern,

I am writing in regards to Proposal 121

5AAC 33.350. Closed waters around Coffman Cove.

I have been working out of Coffman Cove for 15 years now as a commercial fisherman and have seen the growth of sport fishing industry first hand. It seems to me that the commercial fleet has stayed relatively consistent in the number of boats fishing the waters around Coffman Cove, where as the number of sport and charter vessels has at least doubled in the last decade. The city of Coffman cove even installed a new dock system to accommodate all the smaller sport fishing boats just a few years back. I understand that this influx in sport fisherman (mostly from out of state) has been a much needed source of revenue for the community of Coffman Cove.

I am perplexed by the notion that the commercial fleet would lose the right to fish these waters solely because our nets might be in the way. If obstructions in transit is the true issue here (which I'm sure it is not) then we should be discussing the amount of crab pots being placed in the middle of the approach to Coffman Cove as well. That being said any loss of fishing grounds for a commercial fisherman is a direct loss in income. The mere notion that closing commercial fishing areas would limit potential accidents is absolutely ludicrous. We are only fishing there two to three days a week, a very short window to make a living I might add.

I believe that the safety of any vessel and that vessels crew is solely the responsibility of that vessels captain. Gillnets by law have to be clearly marked on both ends making them easily avoidable. Moving the area boundary lines is not the answer to the issue here. The real issue, I believe is putting someone unqualified behind the controls of any vessel, sport or commercial.

If you have any questions or concerns regarding my comments please feel free to contact me at anytime. Thank you

Best Regards,

Gabe Winter



Submitted By
Gabrial Canfield
Submitted On
12/22/2021 4:41:00 PM
Affiliation

Phone
9076177280
Email
gabefloren@gmail.com
Address
2013 2nd ave
Ketchikan, Alaska 99901

My name is Gabe Canfield and I am a lifelong resident of Ketchikan and fisherman. I enjoy herring eggs and salmon and all sorts of subsistence our ocean has to offer us.

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.



Submitted By
gail sterling
Submitted On
12/20/2021 8:43:57 PM
Affiliation

Phone
907-489-2241
Email
lilpelican2003@yahoo.com
Address
box PPV
port protection, Alaska 99950

I support proposal 80. require that individual gear and user groups be responsible for their own overages.

I am against proposal 83. all troller and lodge/guide industry were negatively impacted by restrictions of new Treaty regs. Why should recreational sector get special treatment?

Charter fleet keeps growing. There is no limited entry control. P83 wont work without limited entry on guides. all user groups had reps on Pacific Treaty Panel. Everyone knew the results and requirements for compliance for next 10 years. Everyone has to play their roles to comply.

rapid growth of unguided bare boat rentals is causing a rapid growth in the nonresident recreational harvest. without a constraint on that, P83 will result in an open ended reallocation to recreational sector driven by the tourist while the mostly resident troll sector pays for it by losing access to king salmon.

there is a lawsuit in WA state federal court that my futher restrict king salmon access in SE. now is not the time to be changing the king salmon mgmt plan.

we all must accept the losses and guides and unguided lodges must do the same.

Trollers pay 3% enhancement tax to pay for king salmon hatchery production. charter fleet and lodges benefit from this production without paying for it.

Also I support P144. unguided charters submit logbooks, like the guides are required to do. Lodges that have bare boat charters are not monitored. they tend to be in remote places and are effectively unmonitored.

thank you for this opportunity to comment on the proposals.



Public Comment on PROPOSAL 208

PROPOSAL 208

5 AAC 32.150. Closed waters in Registration Area A.

Close waters in Kasaan Bay to commercial fishing for Dungeness crab, as follows:

5 AAC 32.150(#) waters of Kasaan Bay north of a line that stretches from Adams Point located at 55°32.921'N lat., 132°26.426'W long, to Mound Point located at 55°34.508'N lat., 132°33.957'W long.;

I am opposed to proposal 208!!!!

Reason #1 -while this may look like a small area on a map it is in reality a very productive crab ground. This area is responsible for a large percentage of the crab that is harvested from area 2. Closing this very productive area will force fishermen that have already lost a large percentage of their fishing grounds to pack even more gear into the areas that are left. This is good for no One!

Reason#2 -there are plenty of crab for other user groups. The fishery is only for a few months in the winter. A time period when subsistence, personal use, and sport fishermen are generally not even out on the water. By spring time the crab from the winter molt have hardened and a very plentiful.

I am not speaking as a person that lives in another town or out of state and just wants to make money off this resource. I have lived in Hollis just a few miles from this area since my family moved here in 1989. I was 8 yrs old and I grew up playing working and living off these waters.

I have been participating in the commercial Dungeness fishery in the Kasaan Bay and 12 mile arm area since 1998. In the last 24 yrs I have seen the Dungeness population boom and bust just like it does all over Alaska, WA, OR, CA and Canada. But I have never seen a time when you could not catch enough crab to eat with a few well placed traps!! Yes you are not going to run out and pull pots loaded with crab while us commercial guys have gear everywhere. However if there is so few crab that you can't catch enough for dinner in a few pots, there will be no commercial boats there. We are not out there just because we like going in circles and do not keep fishing an area until the crab are completely gone.

New ones move into the area and catch 20 crab in a pot one week then only a few the next time they go out. Not realizing that the crab don't always feed, they immediately blame the commercial guys. Crab like other animals have their own issues, maybe they are molting, mating, resting, hiding from a 20 foot tide change or they just aren't hungry.



In short the dungeness fishery is a very sustainable fishery and there are plenty of crab to go around.

Please do not close more areas and further impact not only my livelihood but also that of many others in the area for no good reason.

Thank you for taking the time to consider my thoughts

Gary Adkison

F/V Kala Kai

Hollis AK

Submitted By
Genevieve Lapidus
Submitted On
12/22/2021 10:23:28 PM
Affiliation



PC133
1 of 1

Email

Vivilapidus@gmail.com

Address

3838 48th Ave
Seattle, Washington 98105

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

This is for indigenous folks but it's for ALL of us. Stop before it's too late and we have to mourn yet another species and ecosystem destroyed. You have the power. Don't waste it. Yours sincerely, Genevieve

Submitted By
Gianna Kersch
Submitted On
12/21/2021 2:16:09 PM
Affiliation



PC134
1 of 1

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. Personally, the herring are incredibly meaningful to me and cannot be separated from my life in Sitka. The herring feed my friends throughout the year. The harvest is a special time for coming together after long winters. The herring are sacred not only to Tlingit folks but also to those of us who participate in these cultural phenomena alongside our Tlingit friends and family. Because of the herring, I have a community that I can call family in Sitka.

Finally, please bear in mind that Tlingit folks have properly cared for Tlingit Aani and Sheetka Kwaan since time immemorial. They are particular stewards of the herring, to whom they are sacred. They know how to manage these resources properly. Please listen to what Sitka Tribe of Alaska and other Tlingit folks have to say and consider their comments of the utmost importance. Thank you.



Submitted By
Glo Chitwood
Submitted On
12/22/2021 12:15:55 PM
Affiliation

Phone
7198390380
Email
glo@justtransitionak.org
Address
328 Third Ave
Seward, Alaska 99664

My name is Glo Chitwood, and I am privileged to live in southcentral Alaska where Indigenous people have been subsistence harvesting for thousands of years. My passion is working in service of those most impacted by extractive industries and environmental injustice.

Indigenous people hold the solutions to the issues that arise from Alaska's exploitative and extractive economy. Alaska Native people have been hunting and harvesting in a regenerative way for time immemorial. We must listen to these communities. We need them, and Alaska needs them. They hold the key to our future.

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals go far enough to advance respectful stewardship and protect the herring for generations to come.



Submitted By
Grant EchoHawk
Submitted On
12/19/2021 6:59:36 PM
Affiliation

Phone
4252496085
Email
grant.echohawk@gmail.com
Address
501 Pittinger Ave
#3
Ketchikan, Alaska 99901

Hello,

I strongly support Proposals 156,157, & 158.

I oppose Proposals 159, 160, 161, 163, 164, 165

Thank you,

Grant EchoHawk



Board Members

Wayne Jensen
President
Jensen Yorba Wall Inc

Benjamin Brown
President Elect
Perseverance Theatre

Eric Forst
Past President
Red Dog Saloon

Bruce Denton
Secretary
Juneau Self Storage

Max Mertz
Treasurer
Mertz CPA & Advisor

Mike Satre
Hecla Greens Creek Mine

McHugh Pierre
Goldbelt Inc.

Jodi Garza
Alaska Seaplanes

John Blasco
Alaskan Brewing Co.

Laura Martinson
Caribou Crossings

Connie Hulbert
AEL&P

Scott Bergmann
The Alaskan Fudge Co.

Ray Thibodeau
Alaska Marine Lines

Richard Burns
Juneau Radio Center

December 22, 2021

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

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

Subject: Opposition to proposals 101 & 103

Members of the Alaska Board of Fisheries,

The Greater Juneau Chamber of Commerce represents nearly 400 businesses and individuals in Juneau, with members both directly and indirectly impacted by the successful management of fish stock in the region. Our direct experience is watching the growth and development of Douglas Island Pink and Chum Inc. (DIPAC) – literally since its inception. DIPAC is a private non-profit hatchery corporation based here in Juneau, Alaska with a stated mission to “sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska’s salmon resources and salmon fisheries through research, education, and tourism.”

We believe that DIPAC, along with other hatcheries in the region have sufficient oversight and commitment to the responsible development of salmon stock. The Juneau Chamber objects to any additional regulation that could potentially impair the availability of fish stock for the various user groups who enjoy and rely upon the hatchery-raised salmon.

Juneau Chamber opposes proposals 101 & 103.

Respectfully,

Craig E. Dahl, Executive Director
Greater Juneau Chamber of Commerce

907-463-3844
cdahl@juneauchamber.com



December 21, 2021

2021 Officers

Benjamin Edwards

President
Edward Jones

Mary Wanzer

First Vice President
Coastal Real Estate Group

Morgan Weber

Secretary
KPU Telecommunications

Jason Button

Treasurer
Tongass Federal Credit Union

Chelsea Goucher

Past President
Foraged N Found

2021 Directors

Andrew Spokely

Ward Cove Group

Bergen Wieler

Vigor Alaska

Christy Willis

AFLAC

Carolyn Henry

PeaceHealth Ketchikan Medical
Center

Jeremy Yoder

Alaska Crepe Co

Abby Bradberry

Island to Island Veterinary Clinic

Jai Mahtani

Gold Rush Jewelry

Jacquie Meck

The Local Paper

Katherine Tatsuda

Tongass Federal Credit Union

Chamber Staff

Michelle O'Brien

Executive Director

To the Members of the Board of Fisheries:

As the Executive Director of the Greater Ketchikan Chamber of Commerce, I am writing on behalf of the Board of Directors of the Greater Ketchikan Chamber of Commerce in regard to the Southeast Board of Fisheries meeting with support for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). We urge you to oppose Proposals 101 & 103 due to the damage they would inflict on salmon fisheries across the Southeast region and the decreased hatchery production that would result if these proposals were implemented. Our organization represents more than 280 businesses that rely on the economic health of Ketchikan and the greater Southeast region. Not surprisingly, robust fish returns are vital to the economic wellbeing of so many businesses across our region. Should Proposals 101 & 103 be approved, the economic impact would be severe to many local businesses and could ripple through the Ketchikan economy in disastrous ways.

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. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast 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. Alaska's 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 SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI 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, Southeast harvests of hatchery salmon generate approximately \$237 million in total output. Additionally, Southeast hatcheries support 2,000 jobs and provide \$90 million in labor income. SSRAA, NSRAA, DIPAC, and AKI 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 Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, 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 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your serious consideration of this important matter.

Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

We look forward to your decision supporting our vital industry,

On behalf of the Board of Directors:

**Ben Edwards
President
Greater Ketchikan Chamber of Commerce**

**Michelle O'Brien
Executive Director
Greater Ketchikan Chamber of Commerce**

Submitted By
Greg Albrecht
Submitted On
8/2/2021 12:26:47 PM
Affiliation



PC139
1 of 1

Hello Board Members,

I'm writing to express support for proposals 135, 138, 139, and 140, which are steps towards equalizing opportunity between personal use and commercial fisherman, particularly for sockeye salmon. Providing a "fair and reasonable opportunity" for sport, personal use, and commercial fish harvest is a regulatory obligation of the Board of Fisheries under Sec. 16.05.251.17(d).

Opening marine waters near the Taku river and Sweetheart creek for personal use fishing with a small seine or gillnet would allow more residents to safely and economically gather sockeye. I understand the annual personal use harvest of Taku River sockeye is 5-10% of the total annual harvest [REDACTED] and imagine opening the marine waters would level opportunities.

Opening marine waters in front of Sweetheart Creek would do the same and reduce bear-human conflicts, [REDACTED]
[REDACTED]

Thank you for your consideration and service to Alaskans, through the Board.



December 22, 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 Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Juneau, Alaska, and I participate in the commercial salmon fisheries of the Southeast region. We own processing plants in Juneau and Hoonah. Salmon fishing in the Southeast region is very important. Our main salmon production that supplies the volume we need to operate is DIPAC summer chum salmon. Without the chum salmon produced by DIPAC there would be a much smaller gillnet fleet in Juneau and our processing plant would not have the volume needed to support operations.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

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. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast 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. The 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 SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI 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, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.



Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.

SSRAA, NSRAA, DIPAC, and AKI 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 Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Hank Baumgart
hank@icystraitseafoods.com
(907) 738-1607

Submitted By
Hannah Berry
Submitted On
12/16/2021 2:42:55 PM
Affiliation



PC141
1 of 1

I support the herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
Hannah Wilson
Submitted On
12/21/2021 11:03:59 AM
Affiliation



PC142
1 of 1

To the Board of Fish,

I am writing to express my support for proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Sincerely,

Hannah Wilson



From: [Heath Bone](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Comment
Date: Wednesday, December 22, 2021 8:42:08 AM

Hello, my name is Heath Bone. I support proposal 83. I am a lifetime resident of Sitka. I own and operate Pinnacle fishing charters, Llc. I have been guiding in Sitka since 1991. I have seen the limits change many times over the years. I will say that it is better for my business to have as consistent of king salmon limits as possible. My clients book a year or more in advance. They would appreciate a more predictable king salmon limit. Being able to count on a more consistent limit on king salmon rather than being rewarded in high abundance years and maybe none in low abundance years. I believe that would make more of them more likely to come to Alaska and fish again. Allowing the sport fleet to harvest 20 percent of the king salmon quota on average will help to achieve this. Charter fishing is responsible for a lot of revenue to the Sitka community. As a resident I greatly appreciate the opportunity to harvest my personal king salmon year round as well. Thank you for considering proposal 83.

Submitted By
Henry H. Westmoreland
Submitted On
12/16/2021 2:28:31 PM
Affiliation



PC144
1 of 1

Herring are important to all of us, not just Alaskans.

We have had to have a moratorium on shad here in the Northeast.

Herring is a vital source of food and a delicacy for Americans and any others fortunate to have access to fish from Alaska. It is also important to the indigenous peoples of Alaska.

I want to conserve remaining herring and increase their abundance for sustainable harvesting.

Accordingly, I specifically support proposals 156, 157 and 158 which incorporate elements of traditional ecological knowledge into the management of the commercial herring fishery in Sitka Sound to foster herring abundance.

I further oppose proposals 159, 160, 161, 163, 164 and 165 that will lead to destructive, counter-productive high-grade overfishing with seines and renewed decimation of local stocks in bays and inlets up and down the coast

Preserving the herring population is essential to fisheries and the livelihood of fishermen in the long run, to maintain a sustainable supply in the food chain for future generations to come.

Please consider adopting proposals 156, 157 and 158
and rejecting proposals 159, 160, 161, 163, 164 and 165.

Thank you.

Sincerely yours.

Submitted By
Hillary
Submitted On
12/22/2021 8:52:19 PM
Affiliation



PC145
1 of 1

Hello, My name is Hillary Hunter. I grew up in Petersburg Alaska which is heavily reliant on commercial fishing. I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. While I'm sure many of my fishing friends will disagree, I think that the best thing for my community and our planet in the long run is to practice restraint instead of greed in the now so that this key species can continue to benefit the ecosystem we love and the economy that we rely on for eons to come. Extending the periods that people can use to fill their quotas will exacerbate the issues that are leading to them needing to do this in the first place. If we have come to understand better the requirements for herring populations to thrive then we need to update our policies to reflect this information, such as the importance of age and reducing fishing pressures on the older population. We must be kind to our future selves by making good decisions today. Sincerely, Hillary



Submitted By
Holland Bool
Submitted On
12/21/2021 5:01:14 PM
Affiliation

Phone
4156866000
Email
boolholland@gmail.com
Address
504 Shennett Street
Sitka, Alaska 99835

I am writing to express my most fervent support for Herring Proposals 156, 157, and 158, all of which would promote more sustainable and sensible management of Sitka's commercial herring fishery, in turn benefiting Sitkans and the long-term survival of our marine ecosystem. These proposals are timely, necessary, and quite frankly, essential to continuation of Sitka's herring population and the culture tied to it.

I have been lucky enough to participate in the traditional Tlingit roe-on-branch subsistence harvest and to bear witness to its significance across all of Alaska and beyond. To imagine a future where harvesters needs continue to be ignored, thereby risking further damage and reduction of stocks is appalling. For this reason, I would like to express my opposition to proposals 159, 160, 161, 163, 164, 165, 166, which all lack good scientific justification and disrespect subsistence users and modern and traditional Tlingit knowledge.

Moreover, I urge the Alaska Department of Fish and Game to keep in mind that we belong to nature, and that nature does not belong to us. As Alaskans, we have been blessed with bountiful natural resources for time immemorial; but these resources are not infinite nor are they infragile. There must be dramatic amendments to the current management scheme of Sitka's commercial herring fishery in order to protect the longevity of this keystone species. Herring Proposals 156, 157, and 158 present a reasonable and evidence-based alternative to current practices that would allow herring to thrive for generations to come.

Submitted By
Hunter Byron
Submitted On
12/17/2021 8:25:53 AM
Affiliation



PC147
1 of 1

I am a Power Troll Permit holder. I am writing to voice my opposition to Prop 83. The borrowing of Chinook quota allocation from the commercial fleet to the sport/charter fleet on low volume years is not right. Every commercial fishing vessel in the state has a State of Alaska limited entry permit to be able to harvest salmon. This enables checks and balances in regards to access to the fishery quota and sustainable management. There is not a limited entry system in place for the charter fleet in regards to salmon. I understand tourism is a big component of the economy in the southeast. However, so is commercial fishing especially to the numerous small communities. Many Charter/Lodge operations are now worth many multiple millions of dollars. Whereas, a hand troller can go out with their \$20k operation and make relatively good money during the Chinook troll openers. I grew up in a small village on Kodiak and I've seen how decline in the small boat commercial fishing industry and increase in regulations that do little to aid sustainability but forces the small guys out. I've seen how that affects the rural communities. I myself had to move out of the village I've called home my whole life. in order to be able to work to be able to get invested into my own commercial fishing operation. I think any reallocation of quota especially on low abundance years will hit the small hard working commercial fishermen the hardest. I think it is short sighted and of poor judgement to allocate from a defined user group with vessels who have been trolling these waters for well over a century in favor of a user group that has no limited entry rights and caters to high end customers out for a thrill and some instagram posts.

Thank you for taking the time to read my comments.

Submitted By
Jacob Finsen
Submitted On
11/21/2021 7:08:31 PM
Affiliation



PC148
1 of 1

Hello, I am a Sitka resident and parent writing to you today to ask you to support STA's proposals 156, 157, and 158 and to OPPOSE proposals 159, 160, 161, 163, 164, and 165. The measures included in 156, 157, and 158 that make changes to herring quotas and protect older fish are crucial for protecting the herring population. By protecting the herring population we are supporting indigenous people, strengthening the health of our coastal communities, protecting the health of wildlife within our waters, respecting traditional ecological knowledge, and upholding our responsibilities as stewards of these lands. Further, we are protecting the safety, security, and health of our future generations, so I also write to you on behalf of my infant daughter and the other children of southeast Alaska. Thank you for honoring the strength and well being of my southeast Alaskan community through your support of these proposals.



Submitted By
Jacob Friske
Submitted On
12/20/2021 10:38:56 AM
Affiliation
Sitka Crabber

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My name is Jacob Friske and I am 15 years old. I was born in Sitka and have been commercially crabbing with my family since I was 7 years old. Just recently I bought a boat with my dad so I can start running my own 75 pot permit with my friend Rylan who is also 15.

I've worked hard, learned a lot and I am very excited to start commercial crabbing on my own.

I oppose Proposal 201 because I had planned to commercially crab in this area this summer. These areas are more accessible to me and my small boat and I'm familiar with this area and have crabbled it with my family for many years. The other reason I oppose this proposal is that it is closer to Sitka and easier for me to get to town and deliver crab and burn less gas.

I'm a young crabber and just starting out. I do know that Proposal 201 will make it tougher for me to get started in this fishery.

Thank you for your time.

Jacob Friske

Rylan Armstrong



Submitted By
Jacob Miller
Submitted On
1/13/2021 8:51:03 PM
Affiliation

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Hello-

I'm writing to express my concern over the currently scheduled BOF meetings in mid/ late April; I think it would be best to push the meetings off a year and let the Covid19 pandemic settle down a bit, the vaccination to be administered to a wider population and keep the larger percentage of the population safest, especially the small communities to where many folks will be returning to after the meeting. I think the smaller communities will have a tough time communicating and following along via a digital format in turn their voice won't be heard properly.

Bottomline: I think the meetings should pushed off for a year for the general safety of everyone.

Thank you for your time!