



Submitted By
Aani Biorka Perkins
Submitted On
12/10/2021 4:02:12 PM
Affiliation

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I strongly support proposals 156, 157, and 158. I feel these proposals would truly lead to the safe and sustainable management of the herring population and herring fisher in Sitka Sound. Population resilience is vital to protecting the herring and the fishery itself for future generations, and the proposals 156-158 provide actionable ways to minimize harm against the herring and to care for them for generations to come.

Further, I strongly oppose proposals 159, 160, 161, 163, 164, and 165. There is very little scientific justification for these proposals, and in fact would be very harmful and put the herring population at higher risk than it is at already. Proposal 159 contradicts ADF&G's obligation to distribute the commercial harvest, and this obligation needs to be fulfilled for the herring population to be protected. Proposal 160 is devastating for subsistence users who need to fish to support their families. Regarding proposal 161, subsistence fishermen are causing the least harm to the herring population, and should not be further regulated for the harms caused by the commercial fishing industry. Proposals 163 and 164 would result in a low survival rate for older fish, which reduces the population resilience, and as a result will support fewer jobs for people fishing. Last, proposal 165 risks completely wiping out the herring population, which is not beneficial for commercial or subsistence fishermen: we need fish in order to fish.



Submitted By
Aaron Brakel
Submitted On
12/22/2021 4:04:40 PM
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Thank you for taking the time to consider my comments on the herring proposals before the 2021/2022 Alaska Board of Fish meeting cycle. I support the proposals by the Sitka Tribe of Alaska and oppose the other proposals.

In general, I believe that the herring in Southeast Alaska should be managed as they are; in a historically depleted state and at great risk under changing ocean and climate conditions. Sitka Sound is our beacon, our best remaining opportunity to get things right. The highest and best use, the most critical beneficial use, and the one that should be given preference among competing uses and fisheries, is conservation, and restoration. That use, conservation and restoration, is not in conflict with subsistence use at Sitka.

There are a couple of big year classes, young year classes, at Sitka Sound. I think the herring are telling us something, and that we should be listening. If I listen carefully, I think they are saying pretty much the same thing my son says to me, "Don't [REDACTED] it up."

I support the subsistence users of herring eggs, and their relationship with the herring cycle. This relationship has been badly damaged throughout most of Southeast through overfishing, both before and after Statehood. It's a real good time to listen to the historical stewards, who hold and represent traditional local knowledge.

A couple comments about me, in case you're interested. I have seined herring at Sitka, and at Togiak, and Port Moller. My first experience in commercial fisheries was helping to build a Sitka herring seine in the old Juneau Cold Storage building. I'm also adopted Kiks.ádi and my Tlingit family is from Sitka. I know how important the herring eggs that get shared out from Sitka are to people here in Juneau and around Southeast.

I believe that the Board of Fish and ADF&G management need to join hands with the Tribes and Indigenous peoples around Southeast and find ways to restore herring abundance.

With abundance in mind,

Aaron Brakel

Proposals:

Proposal 156

I support Proposal 156, which would more gradually increase the guideline harvest level starting from a lower level once the harvest threshold is reached. This is protective of the resource at lower biomass levels.

Proposal 157

I support Proposal 157, which seeks to protect older more fecund female herring from being selectively over harvested. This is protective of the resource.

Proposal 158

I support Proposal 158, which seeks to minimize negative impacts of the commercial fishery when stocks lack sufficient older age classes.

Proposal 159

I oppose Proposal 159. This proposal seeks to eliminate protections for subsistence use.

Proposal 160

I oppose Proposal 160, which seeks to eliminate a large portion of the small area of Sitka Sound that is closed to the commercial fishery. This area, closest to the Sitka road system, should continue to be protected for subsistence users.

Proposal 161

I oppose Proposal 161, which would add an additional burden to subsistence users.



PC002
2 of 2

Proposal 163

I oppose Proposal 163. Creation of an equal share quota system is incompatible with historical finfish management approaches in the State of Alaska and this type of approach should be avoided. Please don't take us down this road.

Proposal 164

I oppose Proposal 164. Creation of an equal share quota system is incompatible with historical finfish management approaches in the State of Alaska and this type of approach should be avoided. Please don't take us down this road.

Proposal 165

I oppose Proposal 165. I oppose expansion of the Sitka sac roe fishery to a food and bait fishery. With Sitka Sound being the only herring stock left in Southeast Alaska even capable of allowing for a seine harvest these days, it makes no sense to add a food and bait fishery on top of the existing sac roe fishery.

Proposal 166

I oppose Proposal 165. Adding a spawn on kelp fishery to the mix in Sitka Sound is not a winning proposition given the existing and substantial conflict over the commercial sac roe fishery.

Submitted By
Aashish Suresh
Submitted On
11/16/2021 7:24:42 PM
Affiliation



PC003
1 of 1

Hi,

I am a student who is focused on environmental issues in Alaska, and am very interested in this issue. The impact of the food sources impacting the environment and economy is a tight rope to tread, I oppose 159,160,161, 163,164,165. I vote this way to support conserving the herring species.

Aashish S



Submitted By
Abby
Submitted On
12/16/2021 12:29:35 PM
Affiliation

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I am in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166. Herring fishing is very important to our people.

Sincerely,

Abby Pariser



Submitted By
Abigail Twyman
Submitted On
12/18/2021 4:56:15 PM
Affiliation
Action for a Peaceful World

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I am a consumer of subsistence harvested herring eggs, and a supporter of the sustainable management of this food source by the Native peoples of this land. For too long the commercial fishing industry has taken more than just the intended catch, and that has caused an imbalance in our system. We must rely on the ancestral knowledge of the people of this land to guide the future management of our local resources so that we all may continue to benefit from them in perpetuity. For too long their voices have gone unheeded, and it is time that changes for good.

I am in support of proposals 156, 157, and 158.

I am opposed to proposals 159, 160, 161, 163, 164, and 165.

Please commit to protecting our natural resources and heeding the guidance of the Native peoples of this land when it comes to all things impacting our Future Ancestors for the next 7 generations.

I stand with the Herring Protectors. Thank you for listening.

Abby Twyman

Submitted By
Adam Kersch
Submitted On
11/3/2021 12:22:18 PM
Affiliation
University of California, Davis



PC006
1 of 1

I am a medical anthropologist from the University of California, Davis. I have conducted research with and worked alongside the Herring Protectors and the Tlingit elders whose thousands of years of observations inform their knowledge of how to properly care for their traditional homeland, the unceded Tlingit territory of Southeast Alaska. I come to this work as a white anthropologist, acknowledging the harmful impacts my discipline has had, the biases in my own perspectives as a white settler who has benefitted from settler colonial violence, erasure, and displacement. I am writing to urge you to listen to the Tlingit elders who have been asking ADFG to change its fishing policies for the last several decades to no avail. Specifically, I strongly support proposals 156, 157, and 158. I strongly oppose proposals 159, 160, 161, 163, 164, and 165.

My research focuses on the relationship between race, colonialism, and disease. During my research, I learned much about the effects of subsistence regulation. As a tribal elder explained to me, restrictions on subsistence foods means that people have to rely on imported, high-calorie, high-sugar foods. This then makes people disproportionately likely to develop further health problems, such as diabetes. This, in turn, makes Alaska Natives more vulnerable to diseases like COVID-19. Consequently, regulations around subsistence foods such as the ones you are debating have strong implications for public health.

It is my hope that it is not the goal of ADFG is to ensure that a small group of commercial fishers continue to profit off of a crucial piece of Tlingit culture. Bear in mind, for commercial fishermen, herring are simply a product to be sold; for Tlingit people the herring are much, much more and contain deep ecological, cultural, and spiritual significance. It should be the goal of ADFG to ensure the sustainability and longevity of the herring in Southeast Alaska. I encourage ADFG to meet with Tlingit elders to genuinely listen to their knowledge and council. Doing so is scientifically sound - I encourage ADFG to read scholarship on traditional ecological knowledge - and allows the opportunity for expansion of scientific knowledge and may yield crucial insights and strategies for ensuring the ecological health of Southeast Alaska. More importantly doing so is a step toward righting over 200 years of wrongs the American and Russian governments have inflicted upon the Tlingit people. I urge you to listen to the voices of Tlingit elders and to value their input just as much as, if not more than, you value your own scientists' input. I urge ADFG to not continue decades of colonial violence that ignores Tlingit and other Indigenous perspectives prima facie and to instead closely listen to the people who have called this place home since time immemorial.



Submitted By
Adrienne Wilber
Submitted On
12/21/2021 1:08:48 PM
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I support proposals 156 157 158, I do not support 159, 160, 161, 163, 164, 165, 166. Please prioritize herring population resilience for the long run, and the sustainable roe on branches subsistence harvest.



Submitted By
Aimeé Phair
Submitted On
11/17/2021 6:19:42 AM
Affiliation

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I support 156,157,158

Submitted By
Alan Corbett
Submitted On
12/22/2021 5:34:56 PM
Affiliation



PC009
1 of 1

Re: King salmon management proposals 82 and 83

I am Capt. Alan Corbett, a member of the Juneau Charter Boat Operators Association. This association represents 12 fishing and whale watching operators in the Juneau area. I also own and operate Adventures in Alaska, which is a single boat fishing charter service in Juneau.

King salmon are critical to our operation all season. They are especially early season, due to their early run. The prospect of catching a king attracts a lot of anglers dreaming that their first salmon will be a chinook. Continued midseason regulation changes, closures, or restrictive annual limits for king salmon on non resident anglers will dissuade fisherman traveling to Southeast Alaska.

I do not support Proposal 82. I am concerned about the loss of opportunity for non-residents to keep kings in low abundance under this proposal. It also has the ability to manage non-residents midseason, so they never know what regulations to expect. Non resident fisherman who travel to southeast Alaska support local jobs, increase the tax bases, and fuel the economy and fund Alaska Department of Fish and Game through license sale. Continuing to promote southeast Alaska to non resident fishermen will take suitable and stable limits at all abundance levels.

I support Proposal 83 that keeps workable regulations in low abundance and avoids midseason management. It would be much better for customers to have similar regulations year after year than to liberalize limits in high abundance years and get strict limits or closures in low abundance, or to close the fishery unexpectedly. Boom and bust management is not a sustainable model. It's hard to market and keep people traveling to our businesses and communities with unstable regulations.

The proposed cuts to sport regulations in Proposal 82 seem unduly restrictive in the context of what sport fisherman have been allowed previously. I agree it is important to have enough king salmon to allow residents to get fish for the freezer. But it is also imperative that we maintain opportunity for non-residents to retain kings. Doing this will them visiting Southeast Alaska every year. Proposal 83 does a better job for both resident and non-resident fisherman.

I hope the Board can strike a fair balance between all groups that retain king salmon by keeping resident and non-resident oppertunities open all season. This balance will benefit Alaskans by helping fill their freezers food and also help alaskan communities that rely on tourists visiting to generate jobs, boost their economy and feed the tax base.

Sincerely,

Capt. Alan Corbett



Board of Fish

Proposal 171 – Change of start of the pot shrimp season from October to after March.

Comments from Alan Reeves F/V Chopaka – **No**

Attention Board of Fish Members,

I started pot shrimping in 1981, in a scow, with 2 chest freezers and a generator. I fished the Bradfield Ernest Sound area 107-20. I got my own markets for my product, except for a little Halibut. Back then you could fish shrimp year round, the season opening October 1.

Working with the Department of Fish & Game, we decided to close down the season in the Bradfield Ernest Sound 107-20 during March and April to let the shrimp with eggs spawn. At this time you could see the eyes in the eggs. I had upgraded to a 40 ft. boat which allowed me to move to Stevens Passage and work out of Juneau. This was in March where the shrimp weren't as far along in the spawn as they were in Ernest Sound. The eggs the females were carrying were not eyed up yet. I fished there until October when I could come back and fish in Ernest Sound again. I did notice that the large spot shrimp were all females whether they had eggs or not.

Different areas have different cycles. Little shrimp are males, big shrimp are females, they spawn, they molt, and are soft shelled during March, April and May, give or take a month. At this time shrimp with the new shells come out of hiding. They are light shelled, and freezer burn overnight in a chest freezer. Fishing was a scratch until October.

By making this change of fishing in March it could easily double the time to catch the same poundage of shrimp. Doubling the cost to fishermen, if the fishery lasts too long there will be gear conflicts for Seiners and Gillnetters. I lived through all that. We are down to 9 days in Ernest Sound, we've always had a October opening. Fishing is good then, just let us fish in October.

If any of the Board Members have questions, please call Alan Reeves at 907-874-3619.

Thank you.

Alan Reeves

F/V Chopaka

907-874-3619



Board of Fish

Proposal 172 – Change the pot shrimp fishery from a fall/winter season to a spring/summer season.

Comments from Alan Reeves F/V Chopaka – **NO**

Attention Board Members,

I entered this fisheries in 1981, I've been to several Board of Fish meetings, I've been on the Spot Shrimp Task Force since its conception. There have been many changes in the last 30 years we've had to adapt to.

- I've changed 6 different size pots
- changed the shape of gear
- changed mesh size panels
- put in spawning closures
- 8 hour a day pot pulling only
- Daily fish tickets
- Wednesday call ins
- Two day call ins
- Pot tags
- Changed 100 4' pots to 140 36-39 ½ pots
- They announced the fishery was going to Limited Entry before a deadline. This allowed 3 times the shrimp permits in the fisheries. All they had to do was fill out a couple fish tickets.

When I fished in 1981, 1990, 1995 the poundage caught was the same with fewer boats fishing 1 or 2 months. It seems like we're down to 9 days and are catching the same number of pounds. There are so many people using the resource other than the commercial fisherman. We fish less and they fish more. You can see what I've had to do to stay competitive in this fishery. That's why I say just leave it alone. October 1 is good fishing.

If any of the Board Members have questions, please call Alan Reeves at 907-874-3619.

Thank you.

Alan Reeves

F/V Chopaka

907-874-3619



Board of Fish

Proposal 173 – Change the pot shrimp fishery from a fall/winter season to a spring/summer season.
May 21 – July 31

Comments from Alan Reeves F/V Chopaka – **NO**

Attention Board Members,

By changing the Shrimp October opening to a Spring/Summer opening in my opinion you there is no benefit of commercial fishing for a year. You get all the egg released October except the shrimp that were harvested by sport, subsistence and personal use and all the other ways they use the resource.

So March 15 rolls around, the commercial fisheries start, all the big shrimp are female. They will not be there to grow eggs, so the only benefit is the eggs that you let hatch during the previous year by not having the season. So when our biologist say this should allow them to raise the GHL, I don't believe it. A March opener could easily be scratchy depending on the molt, and could take twice as long to catch the same poundage, who bears the cost? This egg hatch wave that is supposedly going to sweep through SE Alaska, I don't believe it. There's other ways to test this theory by closing spot consumption in certain area. There's a lot of other users benefiting on these shrimp, we're just the ones getting managed.

Right now around September 15, the department goes to Ernest Sound, they have their test sets they use every year. Same depth, longitude, latitude. This is 2 weeks before October 1, our commercial shrimp season. I don't feel like this does much good. If you look at past fish tickets it would show that at the end of February there was a body of shrimp we fished on. They refuse to survey during that time, it's been many years since we fished on that body of shrimp. The department refuses to look at old data records, fish tickets. These are facts.

Ideas like changing the starting dates with no data will affect the financial state of the fisherman. All these changes to allow the shrimp to spawn for one year in hopes it will produce a body of new shrimp that will allow the biologist to raise the GHL have cost the fisherman. The spot shrimp fisheries was 9 days this year. Last year it was 12. Leave it be.

If you have any questions, please call Alan Reeves 907-874-3619.

Thank you.

Alan Reeves

F/V Chopaka

907-874-3619

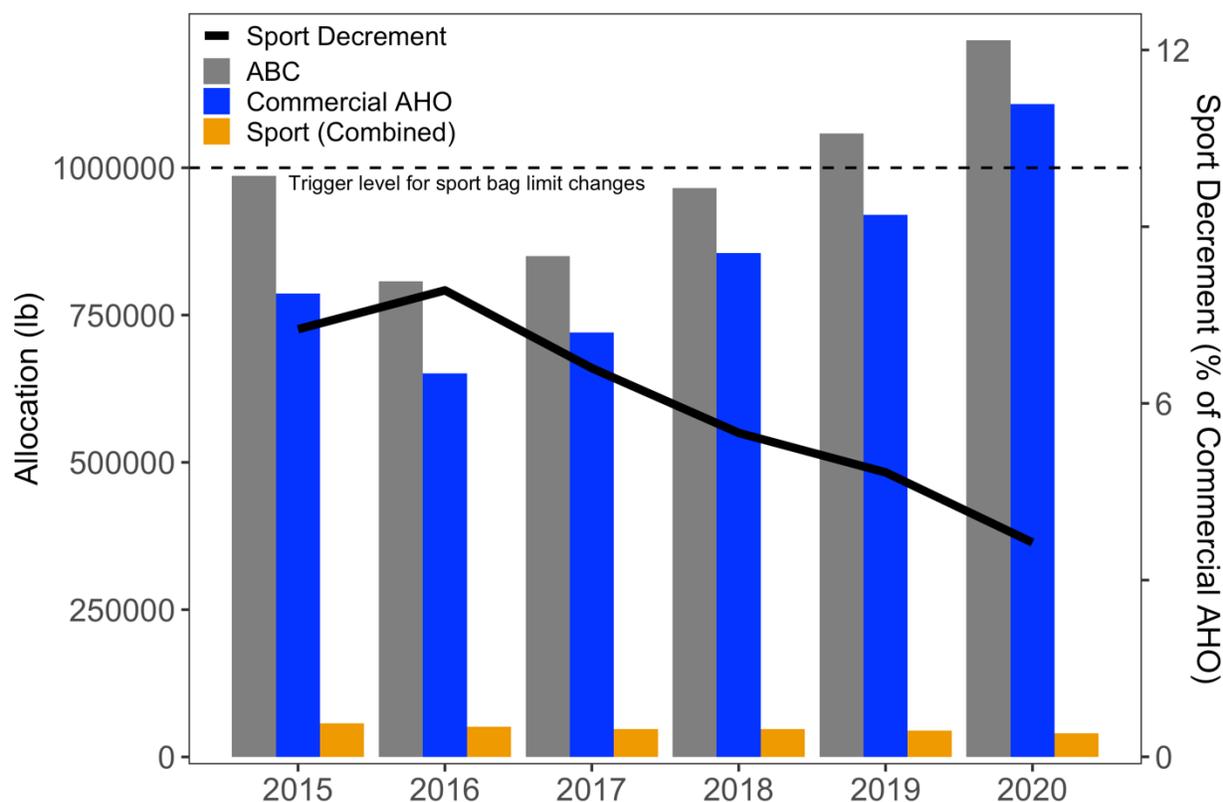


SUPPORT

Proposal 225 – Alaska Charter Association, Richard Yamada

Figure 1. Acceptable biological catch (ABC; gray), commercial annual harvest objective (AHO; blue), and sport fishing decrements (combined guided and unguided; gold) are shown. The solid black line illustrates sportfishing decrements as a percentage of commercial AHO. The horizontal dashed line denotes the level of ABC that should trigger changes to the sportfishing bag limits.

Fig. 1 Commercial and Sport Sablefish Decrements for Northern Southeast Inside (NSEI) Subdistrict, 2015 – 2020.



Comment

ABC and Commercial AHO have been on the increase in recent years (Figure 1), mainly due to strong recruitment of the 2013 and 2014 year classes. The sportfishing industry is regulated by bag limits in numbers of fish whereas the commercial fishery is regulated by weight. Because strong recruitment events lead to more small fish in the population, as shown by decreases in average size (Figure 2), there has been a steady decline in the percentage of harvest taken by the sport fishery compared to the commercial fishery (Figure 1).

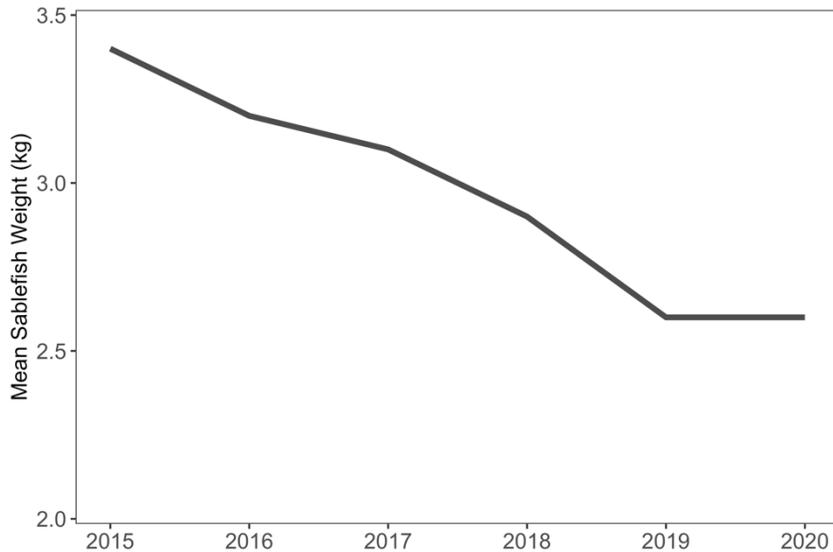
The change of sport bag limits from 4 daily and 8 annual (currently in effect) to 6 daily and 12 annual would help return the sport fishery back to its historic share of the



resource. An ABC trigger of 1 million pounds would ensure that this increase is only made in times of high abundance. When the ABC drops below 1 million pounds, the sport bag limits would return to a 4 daily and 8 annual.

The Board should consider this subdistrict performance for setting of all Southeast Alaska sport bag limits as most guided removals come from this area. Also note that this proposal applies annual limits only to non-residents and not to resident anglers.

Figure 2. Mean Sablefish weight (kg) as estimated from the Northern Southeast Inside (NSEI) subdistrict longline survey (Alaska Department of Fish and Game, 2015 to 2020).





PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION



PC012
1 of 3

December 16, 2021

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email: dfg.bof.comments@alaska.gov

RE: Oppose proposals 101 & 103, Southeast Board of Fisheries Meeting

Chairman Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (board) meeting scheduled for January 4 – 15 in Ketchikan.

The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including four shorebased processors located in Ketchikan, Wrangell, and Petersburg. The Alaska Fisheries Development Foundation (AFDF) is a non-profit organization that represents harvesters, processors, and support sector businesses with a mission to identify common opportunities in the Alaska seafood industry and to develop efficient, sustainable outcomes that provide benefits to the economy, environment, and communities. AFDF also facilitates the sustainability certification of the Alaska salmon fishery by third-parties under two separate global standards: the Responsible Fisheries Management (RFM) and the Marine Stewardship Certification (MSC) programs. The Alaska salmon fishery, including the salmon enhancement program, remains certified under both of these programs. These certifications specifically include criteria to measure fishery management and its use of the precautionary principal to protect wild stocks.

Alaska's unique salmon fisheries enhancement program is critical to the stability of the fishery-dependent communities and processing infrastructure in Southeast Alaska, as well as the livelihoods of and recreational opportunities for thousands of Alaskans. PSPA and AFDF oppose proposals 101 and 103, which serve to reduce hatchery production for no identified specific benefit but would cause direct harm to thousands of fishing and processing businesses, communities, and recreational, personal use, and subsistence fishermen. Very similar proposals were reviewed (and not approved) by the board at the last meeting, and those were also strongly opposed by fishermen and processors.

Alaska's salmon hatcheries contribute nearly a quarter of the value of our state's salmon harvests and generate \$600 million in economic output, with impacts throughout the economy. More than 16,000 fishermen, processing employees, and hatchery workers can attribute some portion of their income to Alaska's salmon hatchery production. In addition, more than 270,000 hatchery-origin salmon are harvested annually in sport and related fisheries, and these numbers are considered conservative (McDowell, 2018).¹ Southeast hatcheries alone annually account for 2,000 annualized jobs, \$90 million

¹Economic Impacts of Alaska's Salmon Hatcheries, McDowell Group, 2018. The number of jobs is an annualized estimate; the number of people who earn some income from the harvest of hatchery salmon is several times the annual average.



in labor income, \$44 million in ex-vessel value to fishermen, and \$237 million in total annual economic output. Chum salmon is the main hatchery focus in Southeast, and this volume is a stabilizing force for both fishermen and processors in a region highly dependent on fisheries.

Unnecessarily reducing hatchery production without a sound scientific basis to do so only harms the region. Hatchery salmon are crucial for Southeast processors, as well as processors in other regions, because they provide volume needed to keep plants operating. In this way seafood processors remain viable and provide markets not just for salmon fishermen, but for all other commercial fisheries as well. Processors and harvesters have made significant long-term investments in processing plants and their fishing businesses, respectively, based on fisheries enhancement programs and permitted production decisions. In addition, tenders, support vessels, support businesses, transportation companies, sportfish businesses, and community governments (through both state and local fish taxes) are dependent on the direct and indirect economic activity that the hatchery programs provide.

The State of Alaska established the hatchery program in 1971—at a time when Alaska’s salmon returns were at historic lows—to provide for more stable salmon harvests and bolster the economies of coastal communities that would not otherwise have viable economies. Since the beginning, the hatchery program was designed to supplement natural reproduction, not replace it, and to minimize negative interactions with naturally occurring populations of salmon. A testament to this design is that wild pink and chum salmon returns in these regions greatly improved since the inception of the program. PSPA and AFDF support a strong hatchery program consistent with the Department and the Board’s sustainable salmon policy.

Proposals 101 and 103 should be rejected because they seek to reduce hatchery production through direct action by the Board, and they unnecessarily move policy and management principles into regulation and make it impossible to adapt to new information as managers deem necessary. These proposals go well beyond incorporating the Policy for the Management of Sustainable Salmon Fisheries in regulation, as they regulate reductions in hatchery production every year should the proportion of hatchery salmon straying into wild-stock streams exceed a yet to be defined rate of straying. The proposed regulation would use an arbitrary threshold of 2%. The 2% stray rate in the proposals was referenced in a 1994 regional planning team report (PWS/Copper River Phase III Comprehensive Salmon Plan) with the qualification included that it was not well supported, did not correlate to straying rates for wild pink salmon, and that further research was necessary. It is not used in current fisheries management, reflected in the ADFG genetic policy, or adopted in fisheries regulation, and should not be used now without basis. Even determining whether a specified straying percentage can be met each year for each species is unreasonable and will require significant research and data collection which is unfunded.

Proposals 101 and 103 should also be rejected because they would reduce hatchery production unnecessarily and significantly harm Alaska salmon users of all sectors, despite a lack of evidence that Alaska hatcheries are causing harm to wild fish production. Per proposal 101 in particular, since the 2018 record return of 3.4 million chum, and a corresponding record survival rate of 17% on the 2016 release, with improved harvest management there has been limited evidence of straying into the headstream of West Crawfish and otolith sampling has confirmed the temporal separation of the wild and hatchery stock. The science is clear that straying occurs naturally in both wild and hatchery-origin salmon stocks and attempts to determine acceptable levels of straying should consider a genetic



propensity to stray, recognition that the stock, species, and environmental conditions influence stray rates, and produce credible research on the impact of straying on the productivity of wild stocks. These are exactly the types of questions the state's Alaska Hatchery Research Project is addressing. This long-term project is an example of the type of robust studies needed to understand impacts, focused primarily on the extent and annual variability in straying of hatchery chum salmon in PWS and Southeast Alaska (and pink salmon in Prince William Sound) and the impact of that straying on the productivity of wild stocks. This project was the State of Alaska's commitment to and investment in research to ensure hatchery production is compatible with sustainable productivity of wild stocks. We appreciate the board's commitment to continually reviewing both the process and the best available scientific information through the Hatchery Committee, to inform the board and the public of wild-hatchery interactions and impacts.

Given the dependence on and benefits of the hatchery program to Southeast commercial, recreational, and subsistence salmon fishermen, and the overwhelming public support for the program conveyed at every related meeting since 2018, we look forward to the board again convening the Hatchery Committee in March 2022 to continue to review components of the program and the ongoing results of the current research project. At this meeting, please reject proposals 101 and 103, given they have no scientific justification and serve to directly harm Alaska's salmon dependent businesses and fishermen.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "C. Barrows".

Chris Barrows
President
Pacific Seafood Processors Association

A handwritten signature in black ink, appearing to read "Julie Decker".

Julie Decker
Executive Director
Alaska Fisheries Development Foundation



Alaska Longline FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 / 907.747.3400 / alfastaff@gmail.com

December 20, 2021

Southeast Cycle: Finfish **Proposal 82 and 83**

Dear Members of the Board,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA is a Sitka-based fishermen's association that includes over 200 vessel owner and deckhand members who reside in 18 Alaska communities. Our organization promotes sustainable fisheries through collaborative research, policy engagement and education. Our members longline for halibut and sablefish, seine, gillnet, or troll for salmon, and some also shrimp or crab during the winter months.

Proposal 82: ALFA's support of this proposal is conditional on two AMENDMENTS as explained below.

This proposal focuses on codifying the piecemeal, out-of-cycle changes that the Board has made in response to the Pacific Salmon Treaty 2019 updates. Generally, the proposal formalizes the status quo, an objective ALFA supports, but we believe amendments are necessary to provide continued opportunity to resident sport fishermen. **We support the following amendments suggested by the Sitka AC:**

Amendment 1: Clarify that nonresident sport king fishing opportunity should always be adjusted to ensure that sport allocations are not exceeded, and the resident fishery remains open:

5 AAC 47.055. Southeast Alaska King Salmon Management Plan...

(4) provide stability to the sport fishery by eliminating in-season regulatory changes, except those necessary for conservation purposes or achieving the sport harvest allocation.

(5) at Alaska winter troll fishery CPUEs less than 6.0 and equal to or greater than 2.6; a resident bag limit of two king salmon 28 inches or greater in length will be established in areas where conservation management measures for all anglers prohibited king salmon retention or closed fishing for king salmon once they reopen.

~~(6) at Alaska winter troll fishery CPUEs less than 6.0 and equal to or greater than 2.6; and the department projects that the king salmon sport harvest allocation is going to be exceeded, the department shall, by emergency order, adjust the nonresident seasons and bag limits so to stay within the sport allocation; the department shall prohibit resident king salmon retention~~

~~or close the resident sport king salmon fishery only if nonresident angler closures are insufficient to remain within the sport fishery allocation.~~

~~(7) at Alaska winter troll fishery CPUEs less than 2.6 and equal to or greater than 2.0; and~~ **If** the department projects that the king salmon sport harvest allocation is going to be exceeded, the department shall, by emergency order, adjust the nonresident seasons and bag limits so that there are no closures for residents.

Amendment 2: Delete the proposed July 1-July 31 resident closure under (g) (2) that would apply to years when the CPUE is 2.6-3.8:

(2) when wild stock management measures are unnecessary:

(A) a resident bag limit of one king salmon ~~except from July 1 through July 31 resident anglers may not retain king salmon;~~

(B) a nonresident bag limit of one king salmon except from July 1 through July 31 nonresident anglers may not retain king salmon;

(C) from January 1 through June 15, a nonresident total harvest limit is three king salmon, 28 inches or greater in length, a harvest record under 5 AAC 75.006 is required;

(D) from June 16 through December 31, a nonresident total harvest limit is one king salmon

ALFA offers the following rationale for the two requested amendments:

- In the absence of a designated saltwater C&T finding for Chinook, most SE Alaska residents meet their subsistence king salmon needs through the sport fishery. It is important to prioritize the resident sport fishery above the nonresident charter fishery.
- In comparison to the non-resident catch, which has greatly increased, the resident sport harvest has remained steady for decades. There is no reason to further restrict resident opportunity. The resident catch is not the reason for the current or past allocative conflicts.

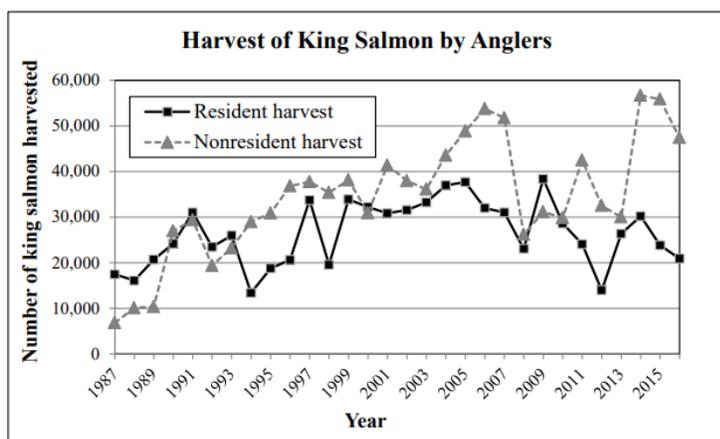


Figure 6 from ADF&G’s Special Publication No. 17-15 *Overview of the Sport Fisheries for King Salmon in Southeast Alaska Through 2017: A Report to the Alaska Board of Fisheries* by Robert Chadwick et al. Note that resident harvest has been between 20,000 to 35,000 since the late 1980s, while the non-resident catch has grown from 10,000 to over 50,000 during that period, with the only sustained downturn corresponding to the 2008 global recession.



- The proposed July closure of the resident sport king fishery in years of moderately low quotas (CPUE between 2.6-3.8) is unnecessary and inappropriate given that management plan for times of lower quotas (for season when the CPUE was 2.0-2.6) do not impose such a closure. If the fishery can be managed in the lowest quota years without closing resident opportunity, a closure in moderately low quota years seems unnecessary.

I would add that in the Staff Comments RC2, the department “*seeks the boards clarification on the use of in-season management to annually achieve the sport allocation under all management tiers.*” In clarifying the conflicting objectives of the Sportfish Management Plan, the Board should recognize that reducing the troll quota to allow the sport sector to avoid in-season management is only appropriate if the troll fleet is compensated in a fair and timely manner. For that to happen:

- There must be a commitment from the sport sector that any fish “borrowed” from the troll fleet will be repaid through a reduction in the following year’s catch. Passively waiting for the charter sector to be below its allocation is NOT acceptable.
- If in-season management is not implemented every time the projected harvest is above or below 20%, there must be a well-defined range for acceptable deviation (e.g., +/- 1% of the combined sport-troll allocation). If in-season catch data projects the sport harvest will land outside of the identified range, in-season management should be implemented to restrain harvest to within the acceptable range. In short—there is no justification for reallocating fish from the troll to sport fishery simply because the charter fleet wants to avoid in-season management.

ALFA strongly opposes proposal 83: This proposal reverts management to the pre-1992 era when sport catch¹ was increasing rapidly and tensions were rising across Southeast. In 1992, the Board established separate troll and sport quotas to stop the open-ended re-allocation of king salmon from the commercial to sport fishery. This proposal ignores the fact that the number of non-resident fishermen continues to increase, a 30-year trend that was only temporarily interrupted by the 2008 recession and the COVID-19 pandemic. Contrary to what the proposer implies, *a fixed bag limit is not an effective constraint on total harvest if the number of anglers increases.*

¹Page 68 of ADF&G sportfish division’s Special Publication No. 21-10 Overview of the Sport Fishery for King Salmon in the Southeast Alaska through 2020: A report to the Alaska Board of Fisheries by Patrick Fowler et al. indicates that “*In 1989, however, sport harvest began a rapid increase due primarily to increases in fishing effort and harvest in outer coastal areas in Sitka and Prince of Wales Island (PWI) as well as increases in hatchery returns. Total (sport) harvest increased from 31,100 in 1989 to 60,500 in 1991.*”

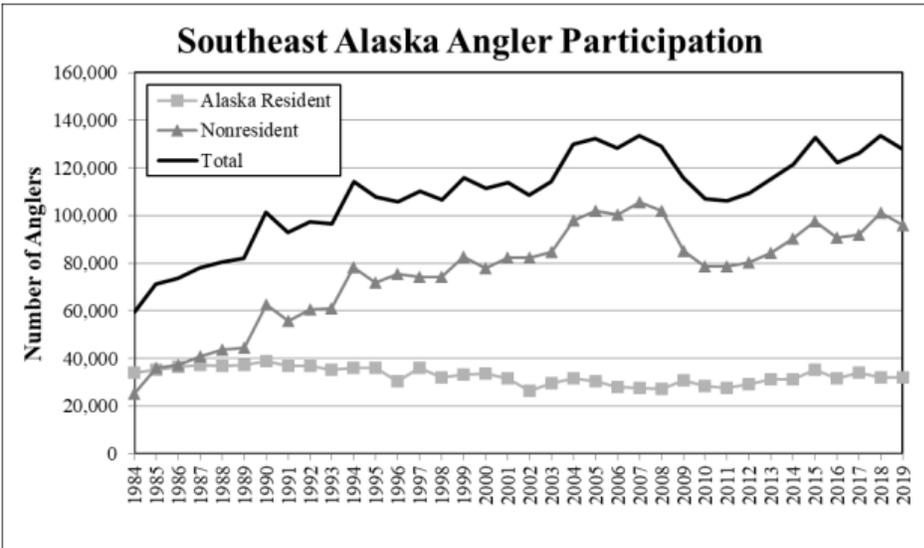


Figure 3 from ADF&G sportfish division's Special Publication No. 21-10 Overview of the Sport Fishery for King Salmon in the Southeast Alaska through 2020: A report to the Alaska Board of Fisheries by Patrick Fowler et al. Note that the number of non-resident anglers has increased steadily excepting the 2008 recession and its aftermath.

In the absence of a major recession or a pandemic, an increasing number of non-resident anglers will lead to an ever-higher sport harvest, as happened in the early 1990's. Since this proposal lacks any means to stop the increase, it would not maintain the 80:20 split and instead would result in a major re-allocation of the limited Chinook quota to the charter industry. This reallocation would impose economic hardship on the commercial troll fleet—which is 80% resident-- and would reignite the tension between the sectors that finally ended with the 1992 action. The proposer suggests the allocations will be rebalanced at high abundance, but again does not include a mechanism to achieve that rebalancing. Since high Chinook abundance is not likely in the foreseeable future, a low abundance reallocation accompanied by vague suggestions of balancing the books at high levels of abundance is simply a reallocation and should be rejected by the Board.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
Executive Director



Alaska Longline FISHERMEN'S ASSOCIATION

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December 20, 2021

Alaska Board of Fisheries: Southeast Cycle

Groundfish: Oppose Proposal 225

Dear Chairman and Board Members:

The Alaska Longline Fishermen's Association (ALFA) is a Sitka-based fishermen's association that includes over 200 vessel owner and deckhand members who reside in 18 Alaska communities. Our organization promotes sustainable fisheries through collaborative research, policy engagement and education. Our members longline for halibut and sablefish, seine, gillnet or troll for salmon, and some also shrimp, or crab during the winter months. On ALFA's behalf, I am submitting these comments on Southeast groundfish proposal number 225.

Northern Southeast Inside: Sablefish

ALFA's membership includes 10 NSEI Sablefish Permit holders, some of whom fish up to six Chatham permits on a yearly basis, as well as 139 federal sablefish IFQ holders. Each of these permit or QS holders hires 2-4 crew, who support their families, the processing sector, and their local communities with their fishing income. Many have been fishing since the 1980s; others are young entry level fishermen who have recently made significant investments in permits and/or quota.

ALFA strongly opposes proposal 225. Proposal 225 increases the non-resident sablefish bag, possession, and annual limits in both state and federal waters as abundance of sablefish in NSEI/state waters increases, which is, number one, a faulty index for state/federal large-scale abundance. Second, the proposal purports to be abundance based but is in fact a one-way allocation increase with no mechanism to reduce daily, possession or annual limits when abundance decreases. The proposer also ignores the fact that abundance is recovering from low levels and is still only 24% of what it was when the equal share fishery was established in 1998—an action the Board took in 1998 to conserve the resource, or that the GHL was 1.5 million pounds when current daily, possession, and annual limits were set. In other words, the proposal suggests an inappropriate baseline by suggesting a lower starting level of commercial GHL than was used when bag limits were first established and asks the Board to significantly



increase the bag limit when the NSEI GH L increases by even a small amount. In effect, if adopted this proposal would quickly increase the daily, possession and annual limits to the maximum limit identified by the proposer—with no mechanism for reduction regardless of future abundance or GH L decreases. In other words, for internal consistency, the proposer should be suggesting lower daily, possession and annual limits to reflect the decline in abundance that has occurred since the bag and annual limits were set, rather than focusing on increasing harvesting pressure on a stock that is still recovering.

As detailed by ADFG in their 2021 NSEI sablefish annual harvest objective news release, NSEI sablefish spawning stock biomass remains at suppressed levels compared to the 1980s and 1990s and the recent recruitment events are fish that are not yet fully mature. Likewise, over 50% of the federal waters' sablefish stock is not yet fully mature and fish over ten years of age, in a species that lives to be 90 years of age, are scarce. ALFA has consistently testified to federal managers in support of conservative management to ensure the strong young year classes currently in the population reach maturity to contribute to rebuilding this highly valued resource.

To remind the Board, in 2021, the Department added additional conservation measure to management of the NSEI commercial fishery by imposing a 15% limit on any annual increases in commercial GH L. The non-resident sport fishery should be managed with an equal commitment to conservation. Staff comments indicate that a 6 fish bag limit would have increased the nonresident catch by as much as 36% each year with no accounting for future growth in angler numbers—more than double the annual increase limit imposed for the commercial fishery.

As the Board is aware, the sport catch is taken off the top along with estimated bycatch and release mortality in the commercial fisheries before the annual GH L is set, in effect giving sportfishermen—and in this case non-resident sportfishermen—a *de facto* priority over the commercial fishery. **Since bag limits were implemented in 2009 the nonresident catch increased 481% (by 2018) and accounted for 96% of the total recreational catch.** During this same period, the commercial NSEI GH L declined below 2009 levels, hitting a 39% reduction in 2016. In 2021, the commercial fishery is finally back to the 2009 level of 1.1 million pound GH L, but this GH L is still well below historic catch limits.

Annual limits for non-residents are a common management tool to provide opportunity while still placing value on a resource. In 2018, 96% of the sport sablefish catch was taken by non-residents. Non-resident sablefish harvest grew from 1500 sablefish to 5000 sablefish over the preceding 10 years. Clearly a 4 fish daily limit and an 8 fish annual limit is generous and provides both incentive and reasonable opportunity for nonresident anglers to target sablefish. There is no limit on charter vessels fishing for sablefish and there is an increasing unguided nonresident harvest. Existing sablefish bag, possession, and annual limits are not impeding interest or participation in the sablefish fishery.

In sum—proposal 225 claims to be abundance based but includes only a mechanism for increasing the bag and eliminating the annual limit. Second, proposal 225 identifies a faulty baseline by suggesting an increase in limits when abundance is still below the GH L levels observed when the equal share fishery was established and below levels when existing bag,



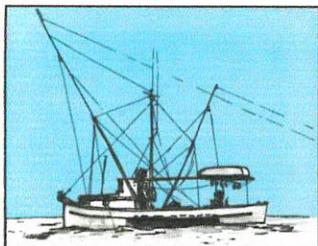
possession and annual limits were initially set. Third, the dramatic increase in nonresident sablefish harvest suggests ample opportunity is afforded for nonresident harvest, hence there is no legitimate rationale for reallocating sablefish from Alaska's hard working commercial fishermen to nonresident charter clients. Finally, this action will change bag limits for sablefish in state and federal waters but uses only the abundance of sablefish in state waters as the index. That is a stretch of science and management authority. **We urge the Board to reject this proposal.**

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Linda Behnken".

Linda Behnken
(Executive Director, ALFA)



Alaska Trollers Association

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December 17, 2021

Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
Juneau, AK 98111

RE: **Proposal 115**

Dear Alaska Board of Fisheries Members,

Alaska Trollers Association (ATA) represents over 900 Power Troll permits and as many Hand Troll permits that fish in the grounds throughout Southeast Alaska up to Yakutat. Although trollers have probably the smallest commercial vessels in these waters, we are the highest quality per commercial fish operations - bringing aboard one salmon at a time - and a major economic contributor throughout this region since we are 85% Alaska resident. Troll data at ADFG dates back to 1911 and ATA has been in existence since 1924. There is informal documentation preceding those dates as well.

We have brought forth Proposal 115 for the purpose of aligning our fishery with the terms of the Pacific Salmon Treaty which specifies that the CPUE based Tiers which establish the all gear SEAK Chinook allocation are calculated based on, "Estimated CPUE From the Winter Troll fishery in District 113 During statistical weeks 41- 48" (2019 PST Agreement, Appendix B to Annex IV, Chapter 3 pg.72). The Treaty language requires an opening in Week 41. ADF&G opens the Winter Troll fishery on October 11. **In the 2001-2020 Baseline, Oct 11 often falls in Week 42, not in Week 41.**

The 2001-2020 CPUE Week 41-48 Model Baseline has an inconsistent number of fishing days. With a starting date of October 11th the number of fishing days varies from 46 to 53 (See Table). Proposal 115 suggests a slightly longer fishing period (max 9 additional days, 10 possible on leap years) but provides a consistent 56 days annually. This standardizing will "smooth out" the consistency of the Baseline providing better data.

There are many variables that can affect the accuracy of the CPUE Model: participation changes based on tides, weather, and the price of fuel and fish and more. This proposal takes the number of days as a variable out of the equation. During 2001-2020 **the Winter Troll season opened 8 times in Week 42, not in Week 41 as agreed to in the Pacific Salmon Treaty.**

Proposal 115 allows for a few more fishing days at a time **when Stocks of Concern (SOC) are not an issue.** Under SOC management the troll fishery has lost 6 weeks of valuable winter harvest in March and April. In May and June Trollers lost lucrative hatchery access areas because of SOC. Higher winter



prices maximize the value of the Chinook resource. This Proposal restores a small part of the loss without causing gear group conflicts or threatening SOC.

Note the chart below:

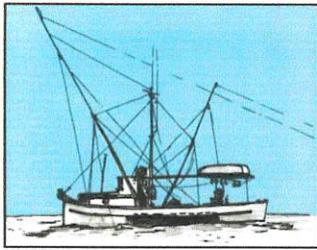
Fishing year (Chinook accounting year)	SEAK CPUE	CPUE Quota Red=over Post Quota. Blue=under	Post season AI	Post quota	October 11 fell on Day and Week	Current ADF&G October 11 opening: Days fished Week 41- 48	Proposal 115: Days fished Week 41-48
2001	8.3	266,600	1.29	250,300	Wed, 42	46 least	56
2002	16.9	334,500	1.82	334,500	Thurs, 41	52	56
2003	20.4	334,500	2.17	334,500	Fri, 41	51	56
2004	8.0	266,600	2.06	334,500	Sat, 41	50	56
2005	8.3	266,600	1.9	334,500	Mon, 42	48	56
2006	10.3	334,500	1.73	266,600	Tue, 42	47	56
2007	3.4	140,300	1.34	205,200	Wed, 41	53	56
2008	2.3	111,833	1.01	140,300	Thurs, 41	52	56
2009	3.4	140,323	1.2	140,300	Sat, 41	50	56
2010	4.3	205,165	1.31	205,200	Sun, 42	49	56
2011	6.1	266,585	1.62	266,600	Mon, 42	48	56
2012	4.7	205,200	1.24	205,200	Tues, 42	47	56
2013	4.4	205,200	1.63	266,600	Thurs, 41	52	56
2014	7.4	266,600	2.2	372,900	Fri, 41	51	56
2015	13.2	334,500	1.95	334,500	Sat, 41	50	56
2016	11.05	334,500	2.06	334,500	Sun, 42	49	56
2017	4.18	205,500	1.31	205,200	Tues, 42	47	56
2018	3.58	140,323	0.92	111,833	Wed, 41	53 most	56
2019	3.38	140,323	1.04	111,833	Thurs, 41	52	56
2020	4.83	205,165	1.39	205,165	Fri, 41	51	56

In conclusion, Proposal 115 conforms to the language of the PST - An Oct 11th opening does not.

Your consideration of this proposal is appreciated.

Sincerely,

Amy Daugherty
Executive Director



Alaska Trollers Association

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December 18, 2021

Alaska Board of Fisheries
c/o ADFG Board Support
PO Box 115526
Juneau, AK 99811

Re: **Proposal 92**

Dear Board of Fisheries Members:

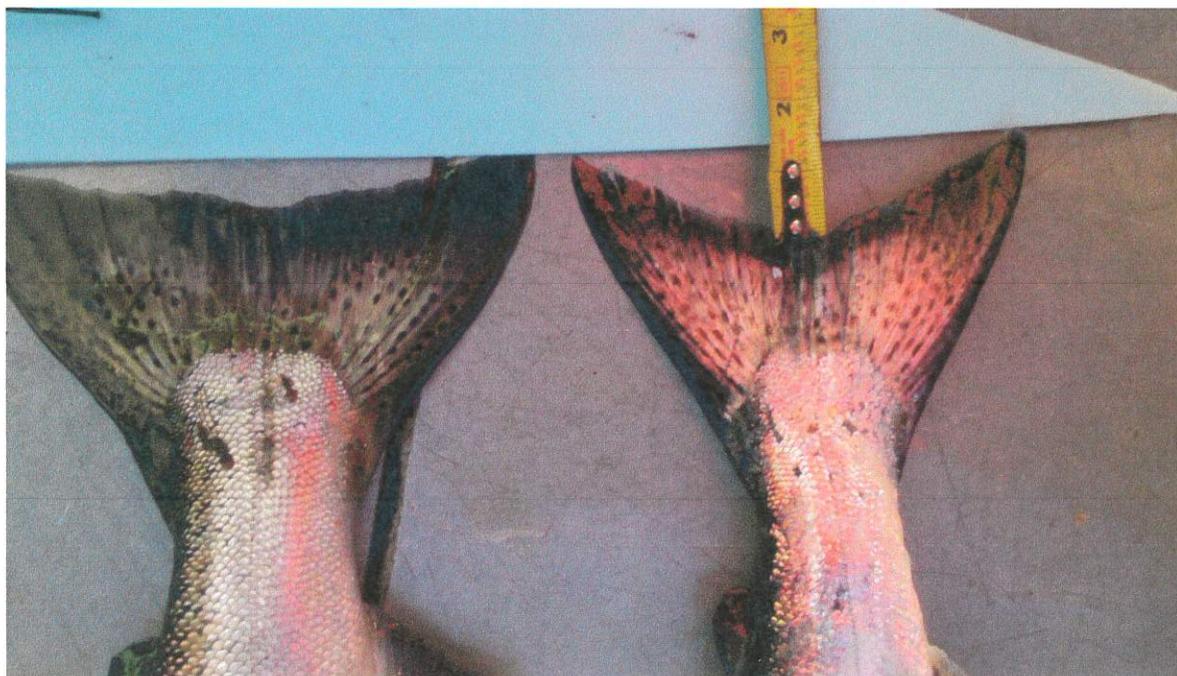
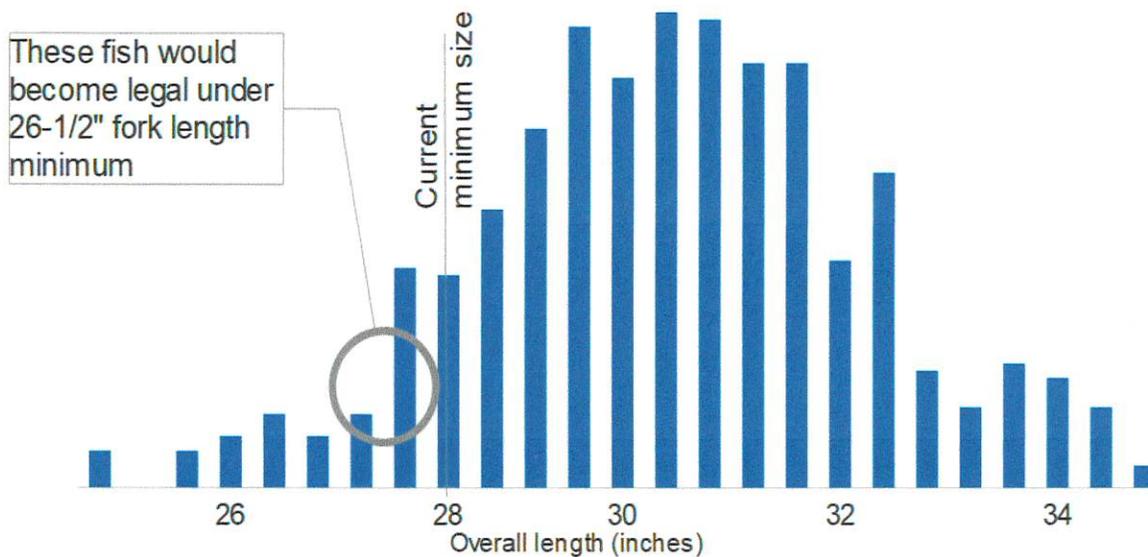
Alaska Trollers Association (ATA) represents the power trollers and hand trollers who fish throughout the waters of Southeast Alaska up to and including Yakutat. Since we have a very high percentage of Alaska resident fishermen, we are a significant proportion of the SE Alaska community economies. Our fishery has been in operation for well over a century, although we harvest about a third of our historical Chinook catch mostly due to three brutal Treaty reductions. We write in support of Proposal 92, which seeks to allow trollers to keep king salmon greater than 26 inches in THAs but offer the following comment for modification.

The Alaska troll fishery has enforced a 28 inch minimum overall length on Chinook for many decades, but since 2006 ADF&G port samplers have measure our coded wire tagged salmon from the fork of the tail rather than the tail tips. This is a more accurate measurement since it is much less sensitive to how the tail happens to be positioned. The fork of the tail stays the same distance from the snout regardless of whether the tail is flared or squeezed. If we were to use this standard it would reduce the number of times that honest trollers are cited by enforcement for short fish, i.e., a fish that was 28" when measured alive, but went into rigor mortis with the tail flared out, and thus short when delivered.

Adopting a fork-length minimum would be particularly beneficial during the spring fisheries due to physical changes in maturing Chinook. As kings near maturity their tails get squarer, making the fork length almost as long as the overall length. An immature king that measures 28" overall will be about 26-1/2" from the snout to the fork of the tail. But a mature king that is 26-1/2" to the fork will only be about 27" overall. Thus, if our minimum size limit in the spring fisheries was 26-1/2" from snout to fork, the protections for immature fish (mostly Treaty fish) would remain unchanged, but we would be able to keep some additional mature fish. These keepers would mostly be 2-ocean hatchery jacks; fish that our 3% enhancement taxes have paid for. As the proposer points out, it is "ridiculous" that trollers are required to release these fish that are likely to then get caught in a gillnet or purse seine. As 2 year old jacks tend to be heavy for their length, they would still be heavier than the 28" immature feeders and thus of significant value to the industry and many Chinook runs are seeing an increasing proportion of 2-

oceans in their returns. Changing our minimum size to 26-1/2" fork length will allow trollers to retain a few more of these hatchery fish.

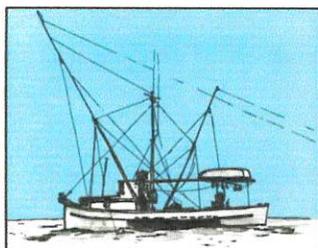
Length Distribution of 2-ocean Chinook 2015-2020 SE Purse Seine THA fisheries only



Your positive consideration of the above proposal as conceptually amended is appreciated.

Sincerely,

Amy Daugherty
Executive Director



Alaska Trollers Association

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December 21, 2021

Alaska Board of Fisheries
c/o ADFG Board Support
PO Box 115526
Juneau, AK 99811

Re: **Overview of SEAK Proposals**

Dear Board of Fisheries Members:

Alaska Trollers Association (ATA) represents the power trollers and hand trollers who fish throughout the waters of Southeast Alaska up to and including Yakutat. Since we have a very high percentage of Alaska resident fishermen, we are a significant proportion of the SE Alaska community economies. Our fishery has been in operation for well over a century, although we harvest about a third of our historical Chinook catch mostly due to three brutal Treaty reductions. Below is an overview of our stance on the many proposals before you. Additionally, we have submitted separate comment letters on Proposals 83, 92 and 115 in order to provide a more in-depth description of those issues.

80	ADFG	internal payback if all - gear harvest is exceeded	ATA supports	This also lays out the 80-20 split and explores payback if aggregate exceeded	The gear group that exceeds that exceeding year seems reasonable
81	Steve Merritt	unharvested lapse to trollers	ATA supports	This is currently practiced successfully as troll harvest can be precisely managed.	
82	ADFG	codifies status quo specifying resident sf preference	ATA supports as amended by TS & Sitka AC	Residents should have priority access to fish therefore no July closure for residents. Non-resident sector needs to be accountable.	Remove resident July closure instead close nonresidents one week earlier as TS suggests and make the non-residents accountable to live within their means



83	SEAGO	guarantees nonresident sf allocation at low tiers	ATA opposes	Prior to early 90's the guides were allowed into our quota until the BoF 80/ 20 split: this removes that encapsulation	Trollers have already lost 2/3 of our Chinook allocation while non-res sf has grown unchecked. Why would our State give guaranteed minimums to non-residents?
84	Jesse Walker	limitations on nonresident sf/ no resident sf closures	ATA supports	ATA consistently supports resident SF harvest	Alaska needs to recognize the unregulated growth of one sector, non-res sf, creates pressure on the resource and puts our local economies second.
85	Territorial Sportsmen	preference to resident sf	ATA supports	ATA consistently supports resident SF harvest	Alaska needs to recognize the unregulated growth of one sector, non-res sf, creates pressure on the resource and puts our local economies second.
86	Steve Hoffman	preference to resident sf	ATA supports	ATA consistently supports resident SF harvest	Alaska needs to recognize the unregulated growth of one sector, non-res sf, creates pressure on the resource and puts our local economies second.
87	Charlie Piercy	xmas tree proposal: more needs to be done to protect the Behm Canal stocks	ATA voted to support amended - without 6 & 7	These actions are recommended to save Unuk and Chickamin stocks from a troller who has watched the decline and improprieties over time.	Amend by pulling #6 & #7 within (although we support those in concept). Rewording needed so it has a chance of passing.



88	Steve Merritt (who later pulled his support)	more moderate than #83 but gives Kings away to unchecked non-resident fishery	ATA opposes	This is a fear based response to Proposal # 83 introduction. ATA is opposed to any allocative changes and requests that all sectors to be managed not to exceed their allocation annually.	Why would Alaska give preference of any guaranteed minimums to non-residents? By nature, and definition, fishing is not an act of guaranteed result.
89	Matt Lawrie	allows 2 more lines if permit stacking	ATA supports	In a surprise vote, the ATA board voted to support this board member's proposal to allow PT permit stacking increasing lines from 4 to 6	This may stabilize permit prices and/or potentially allow easier access into our fishery but highly divisive in our fleet and Sitka AC voted against
90	Tad Fujioka	housekeeping	ATA supports	Change the trigger from AI based to CPUE trigger per new Treaty agreement	Puts uncaught winter kings in spring fishery
92*	Brian Merritt	reduces size limit in THA's	ATA voted to support with amendment	We support this proposal with a modification to specify the 26.5 length to fork.	We encourage ADFG to apply this to all spring THA fisheries since there is a documented size decrease in returning stocks. See separate ATA letter.
94	Ralph Fenner	limit non-resident sf	ATA supports	ATA supports	As a matter of consistency, the SE non-resident fishery needs containment.
96	Charlie Piercy	expand Herring Bay THA area	ATA supports	ATA supports	
97	Steve Merritt	close seining & gillnetting when trolling closed in Anita Bay	ATA supports	Historically trollers had a line in there. Find out if SSRAA supports.	
101	Pioneer Alaskan Fisheries	straying per Nancy at Crawfish	ATA opposes	Particularly Crawfish has proved very worthwhile to our fleet	



103	Pioneer Alaskan Fisheries	Per Nancy AK Hatcheries are not in compliance with mandates	ATA opposes	We oppose this based on our harvest dependency on hatchery fish	
104	SSRAA	establishing a Burnett Inlet THA	ATA supports	housekeeping	
105	SSRAA	establishing a Port St Nicholas	ATA supports	housekeeping	
106	SSRAA	special harvest area gillnetters at Port St Nicolas	ATA supports	housekeeping	
107	SSRAA	establishing a Port Asumcion THA	ATA supports	housekeeping	
108	ADFG	special harvest area Port Asumcion	ATA supports	housekeeping	
109	SSRAA	special harvest area Carroll Inlet	ATA supports	housekeeping	
114	William Dawley	would allow HT to also use fishing rods with 2 hooks	ATA supports with caveat	We support as long as down riggers are hand operated not power	
115*	ATA	move winter fishery start from Oct 11 to first day of Week 41	ATA supports	Per PST our fishery should start on the first day of Week 41 but has not.	See separate ATA letter of support with charts and rationale.
116	Ralph Wells	sell wasted kings For \$1.00	ATA opposes	We appreciate the quest to reduce waste but	Problematic enforcement
117	Jeff Favour	6 lines in Crawfish Inlet for trollers	ATA supports	Should increase troll hatchery harvests at Crawfish	potential problem with enforcement?
121	East POW Advisory	gillnetting stay away from Coffman Cove	ATA opposes	UFA opposes this proposal motivated by one individual	Sets a bad precedent for misuse.

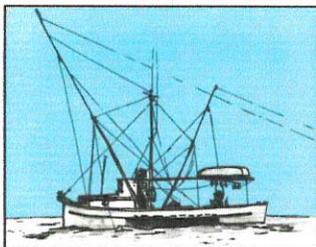


125	SE Subsistence Advisory	Allows incidental taking of king and coho from Taku & Stikine for subsistence	ATA opposes	These two rivers are about to be deemed SOC so the timing is horrible.	Brings forth the question of enforcement and potentially, intent
128	SE Subsistence Advisory	Allowing set gilnets as long as they are fixed / anchored only at one end	ATA opposes	Increasing the efficiency of gear, particularly gear on SOC rivers, will exaserbate weak stocks	We support subsistence harvesting but concerns about SOC dominate
135	Michael Fox	Allows incidental taking of king and coho for personal use	ATA opposes	SE king salmon are either in conservation mode or are already fully utilized by historical fisheries	Adding a new user group is inconsistent with the king salmon conservation and mangement.
143	SE Subsistence Advisory	log book requirements	ATA supports	This illustrates another user group that is frustrated with the increase in the unlimited non-res sport sector	This raises the issue of lack of enforcement on the non-res sector
144	Sitka AC	log book requirements on bare boat charters	ATA supports	This targets the new and growing boat rental who then access larger harvests	Many ATA members have small amounts of halibut IFQ which is the affected harvest

We stand by to answer any questions you may have on the above. Meanwhile, your consideration of the above proposals is appreciated.

Sincerely,

Amy Daugherty
Executive Director



Alaska Trollers Association

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December 22, 2021

Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
Juneau, AK 98111

RE: **Proposal 83 (and 82, 84, 86, 94, 143, 144, 146)**

Dear Alaska Board of Fisheries Members,

Alaska Trollers Association (ATA) represents over 900 Power Troll permits and as many Hand Troll permits that fish in the grounds throughout Southeast Alaska and west of Yakutat. Although trollers have probably the smallest commercial vessels in these waters, we produce the highest quality commercial fish - bringing aboard one salmon at a time. Since Trollers are 81% Alaska resident we are a major economic contributor throughout the region. Troll data at ADFG dates back to 1911 and ATA has been in existence since 1924. There is informal documentation preceding those dates as well.

Trollers, as a viable and entrenched SEAK economic contributor, have 3 major problems: Treaty, Unbridled Growth of the non-resident sport fish industry, and opportunist environmental NGO's. The **proposer of Proposal 83** participates in the first two of these problematic forums for us. By way of background, we should mention that the three PST Chinook losses since 1998 have reduced our Chinook catch 35% + 15% + 13.2% (per the December 2019 McDowell report commissioned by NSRAA to evaluate the economic impacts on SEAK from this Treaty process). So, any "fat" has certainly been cut off the bone already, so to speak.

Two SEAGO board members served on the Northern Panel of the PST negotiations for Alaska, although one is not a resident of Alaska. While we don't claim there was bad faith executed in the Treaty negotiations, ATA did however, at the outset of those negotiations, offer to go along with the proposed mitigation measures if SEAGO agreed not to aggress towards us in this Board of Fisheries forum. (Note the 2019 PST mitigation plan provided significantly more relief for other parties than for Trollers which are the most negatively affected harvesters). The point is: It was well known by all parties involved at Treaty that the outcome would involve overall "belt-tightening" but apparently it is only a one-way street with this sub-sector.

What's before you in this set of SEAK proposals is a full acknowledgment of the total frustration with the growth and greed of the non-resident sport fishery. You have this letter from us, 4 proposals from



resident sport fishermen, one from the Sitka Advisory and one from the Subsistence Advisory Board. They all reach out to you requesting that this board take strong action to stop the unlimited growth of the non-resident sport harvest and make this sub-sector more generally accountable and more accountable within their current allocation without guarantees or preferential games. There is no guaranteed catch in the act of fishing and they should advise their clients of such.

Or do we have a commercial meat fishery, under the guise of sport fishing, which remains untaxed, for the benefit of non-residents, on a very limited Chinook resource? Why does Alaska condone this? While many of our SEAK trollers struggle with yet more Treaty decrements, there are more lodges being built. Why not? ATA believes we all need to keep our own "houses", or sub-sectors, in order and stay within our own allocations. I, as a 47-year Alaska resident, am mortified at the lack of accountability and lack of guts of policymakers to date at reigning in this component of our precious Chinook resource harvest.

Proposal 83 gives preferential treatment to this non-resident sub-sector. It will require trollers to "loan" them an unlimited amount of Chinook without any assurance that they won't "borrow" more the next year, and the next year again (infinitely) when we are in the 4 lowest tiers since this Treaty adopted this CPUE tier system. In fact, all three of the 3 last years since Treaty would have been subject to liberalization of the non-resident limits under this proposed scenario. And, there is no repayment plan proposed – it is an open-ended reallocation. If SEAGO wants a guarantee of no in-season Chinook closures then ADFG should manage conservatively, if that's a risk, and Guided Sport should stop expanding their Chinook season into April. We all receive notice of the CPUE tiers early in the new year.

With budget cuts, creel surveys have been greatly reduced, as has (reportedly) enforcement. Many user groups question the veracity of data coming from the non-resident sportfish subsector (as written in Proposal #146), while the growing bare boat subsector (per proposal #144) largely accelerates localized depletion surrounding our communities. While the new in-season reporting is helpful, we question why it takes 2 weeks to compile. Ideally the involved sub-sector would address these concerns.

We request your attention to the non-resident sport sub-sector issues since these proposals clearly dominate this meeting. It is late for our State's Board of Fisheries to protect our State's small community residents, **but it isn't too late. We need real leadership on the accountability of this sub-sector and ask this Board to rise to this challenge**, for the sake of the resource and our region.

Sincerely,

Amy Daugherty
Executive Director



Aleutian Pribilof Island Community Development Associat



PC015
1 of 1

302 Gold Street, Suite 202 | Juneau, Alaska 99801 | Phone: (907) 586-0161 | Fax: (907) 586-0165
717 K Street | Anchorage, Alaska 99501 | (907) 929-5273 | Fax: (907) 929-5275 | www.apicda.com

December 22, 2021

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

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

RE: Request to Reschedule Proposal 282

Dear Mr. Haight,

The Aleutian Pribilof Island Community Development Association (APICDA) is writing to respectfully request that the Board reschedule its meeting dates for ACR 7/Proposal 282 to a later time in March or April 2022. As you are aware, ACR 7 was forwarded as an agenda change request in October to consider additional restrictions on fishing periods in the Shumagin Islands Section and Dolgoi Island management areas. The currently scheduled meeting dates between March 11-18, 2022, unfortunately overlap with the State-water Pacific cod fishery, in which numerous Area M fishermen participate.

APICDA serves fishermen from the communities of False Pass, Nelson Lagoon, Akutan, Atka, Nikolski and St. George, who participate in both the Area M and the State-water Pacific cod fisheries. While we appreciate the challenges the Board faces with scheduling meetings throughout the year, we believe it particularly important to consider conflicts that occur for out of cycle proposals where public notification is limited. Absent rescheduling, we are concerned that our fishermen and many other stakeholders in the region will be unable to meaningfully engage on a proposal that could have significant impacts on their future fishing opportunities.

We appreciate your consideration.

Sincerely,

Angel Drobnica
Fisheries and Government Affairs Director

Submitted By
Alexandra Fujioka
Submitted On
12/22/2021 2:59:09 PM
Affiliation



PC016
1 of 1

I'm Alexandra Fujioka and I'm writing in support of proposal 230. I support proposal 230 because I enjoy rockfish. I'm a resident of Sitka who has gone fishing many times as a kid. We went rockfish jigging recently in 2021 and I work on my dad's commercial salmon troller, the FV Sakura. We jigged for a while and caught one rockfish. We had to let it go. I was looking forward to a rockfish dinner. I'm upset at the 2020 closing of the demersal shelf rockfish, as I'm a person who enjoys consumption of rockfish. Some reasons to support Proposal 230:

*This allows residents to keep more types of rockfish for food

*Residents don't catch as many rockfish as the nonresidents do in total number of fish numbers because of all the tourists that try to catch rockfish in Sitka.

*Yellow eye rockfish are the most highly prized species of rockfish. They are very good to eat.

*Because they are vulnerable to overfishing, if anyone should have the opportunity to catch them, it should be the locals. In some areas, subsistence has first priority over all other fisheries. Most residents in Sitka that are sport fishing probably keep the fish for dinner, instead of taxidermying them.

*Because of the low survival rate of yellow eye when you have to let them go, being stuck with letting them go can result in almost as many deaths. They would go to waste if they ended dying after they have been let go. This way, at least you get to turn them into dinner. Who doesn't like deep fried rockfish fish and chips?



Submitted By
Alexis Jenkins
Submitted On
12/21/2021 3:50:34 PM
Affiliation

Phone
9077381044
Email
alex.jenkinsc@gmail.com
Address
504 Shennett St
Sitka, Alaska 99835

Dear Southeast Alaska ADF&G Board of Fisheries,

I am writing to urge this Board to take decisive action for conservative management of the last sac roe herring fishery in Southeast Alaska and to protect the subsistence herring egg fishery. Non-conservative management over the last several decades has led to the destruction of over a dozen herring fisheries, decimating a population that oral records show was abundant for tens of thousands of years. Above all, subsistence users and Tlingit people, whose families managed this fishery for thousands of years before the thought of creating the ADF&G even existed, are calling for conservative management of the fishery, and it is your responsibility to listen.

As a resident of Sitka, I was fortunate enough to witness the bounty of last spring's herring spawn. I was also painfully aware that this spawn was a complete outlier compared to the previous decade where subsistence needs went unmet. The fact that this abundant spawn occurred after two years without operating the sac roe fishery speaks volumes. Coupled with evidence from oral history that herring are extremely sensitive to engine noise and stress, and observations by subsistence harvesters of herring spawning grounds diminishing, it is clear that the sac roe fishery is severely detrimental to the herring spawn.

Although I am now a resident of Sitka, I am originally from Virginia, where natural resources were once nearly as abundant as they are in our beautiful state of Alaska. Overextraction of those resources has turned the waters of the Chesapeake, once home to the world's greatest oyster beds, utterly barren. Similar mismanagement led to the severe decline of shad herring, which once ran abundantly from the Hudson River to Florida, churning the water with their great masses and drawing in all sorts of creatures from the sea, feeding thousands upon thousands of people for thousands of years. Virginia is no longer a place to fish. There are many reasons why these sorts of environmental collapses occur, but one core cause remains true for each: short term profit is prioritized over sustainability.

The result? Not only a diminishing of the great natural phenomena, but the disenfranchisement of native people from their ancestral resources and the ultimate collapse of the industries that precipitated the decline.

There are hundreds of examples of overextraction leading to collapse, including a dozen examples here in Southeast with this very fishery. It would break my heart to see the same thing happen in Sitka. This is the last semi-abundant herring population in Southeast Alaska. And oral records show that it is already severely diminished and at risk of collapse. If the herring population collapses, they are gone, and the sac roe fishery will go with them. Any management approach other than a conservative one given these circumstances is negligent.

With this in mind, I urge this Board to support the Sitka Tribe of Alaska proposals (156, 157, and 158) and reject the industry proposals (159, 160, 161, 163, 164, 165), which seek to maximize short term profit to the detriment of all. Particularly, proposals 159 and 160, which seek to further restrict and damage the already small subsistence fishery, are openly malicious towards a longstanding regenerative subsistence practice that sustains hundreds of Alaskans and should be rejected.

Thank you.

Submitted By
Ali Trueworthy
Submitted On
12/20/2021 9:45:46 AM
Affiliation



PC018
1 of 1

Hello,

I am writing in support of Herring proposals 156, 157, and 158 and in opposition of proposals 159, 160, 161, 163, 164, and 165. Sitka Sound is the last herring fishery in Southeast, Alaska, most others having already collapsed due to mismanagement. As populations of non-human species collapse around the world, the story of human exceptionalism that drives our interactions with the rest of the natural world is failing us. By managing the fishery to protect and respect Herring, as described in proposals 156, 157, and 158, we can move away from that story and replace it with stories of our mutual dependence, sense of wonder, value of tradition, and reciprocity. The long-term existence of the Herring in Sitka Sound depends on a stewardship in a manner that is supported by the majority of the Sitka population.



Submitted By
Alison
Submitted On
12/16/2021 3:45:26 PM
Affiliation

Phone
4257734166

Email
Alison_penny@ymail.com

Address
23502 Edmonds way
B305
Edmonds , Washington 98026

I live in a coastal town in WA, and I have worked in the commercial fishing industry in Sitka for a few years now. Living in the puget sound of WA I see what it looks like when natural resources are not protected. Most of our salmon species, and our orca whales here are endangered. People from Washington look to South East Alaska as a magical beautiful place that still has an abundance of natural resources and wildlife. But that abundance is changing due to bad management of natural resources and climate change. Protecting the herring of Sitka sound is very important and what we do today will make longterm impacts on the herring population. Herring is part of the culture in Sitka, a part of the orca, salmon, gray whale, heron and human diets. There cannot be a Sitka Sound without herring.

I support proposals 156, 157, and 158.

I oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
Amanda Bremner
Submitted On
12/22/2021 10:49:50 PM
Affiliation



PC020
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
Andres Camacho
Submitted On
12/22/2021 8:49:47 PM
Affiliation



PC021
1 of 1

I am writing in support of proposals 157 and 158. I've read news in the last couple years about the imbalance in the Sitka herring population by age groups. An overwhelming percentage of the stock are a similar age class. It is critical that we consider how we fish stocks that are in this state as they age. As this age class advances in years and becomes ideal targets for the commercial fishery not in joy is critical that we consider the implications of overfishing the stock as a whole but that we must also consider the damage done by over harvesting critical age classes. Older herring are vital for spawn success. Diversity is always key to a healthy fishery and we have to think about the long term abundance we want to cultivate in Sitka.



Submitted By
Andrew Chione
Submitted On
12/22/2021 7:04:51 PM
Affiliation

Phone
6306180035

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andrewchione@yahoo.com

Address
901 Southwest Blvd
Coos Bay, Oregon 97420

I support herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166. Herring must be managed more conservatively to sustain ocean ecosystems and maintain indigenous ways of life.



Submitted By
Andrew Friske
Submitted On
12/20/2021 8:29:27 AM
Affiliation
Local Crabbers of Sitka

Phone
9077383141
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afriske@gmail.com
Address
420 Kramer Ave
Sitka, Alaska 99835

To State Board of Fish & Game

From: Sitka Dungeness Crabbing Community

RE: Proposal 201

It just recently came to our attention that a devastating Dungeness crab proposal was submitted by a member of the Sitka A.C. Proposal 201 was discussed, voted on and approved back in February 2021. Proposal 201 will be discussed and voted on this January in Ketchikan. Unfortunately, there were absolutely no local commercial crabbing fisherman or crabbing families who were made aware, consulted with or questioned about this proposal. As soon as we were made aware of this proposal we contacted our local AC shellfish representative as well as other AC representatives to ask for reconsideration on the grounds that absolutely no one in the Dungeness crabbing industry was heard. To date, reconsideration of proposal 201 has not been granted nor have the minutes of the meeting when this was discussed and voted on.

Why is Proposal 201 so devastating?

Here is a list of reasons why Proposal 201 should not be approved or negotiated.

- 1) The area proposed for closure is an area where entry level crabbers have a better opportunity for success. We have young fishermen getting started and the areas of Deep Bay and Baby Bear are very protected, safer to run gear and closer to Sitka.
- 2) Displacement of local crabbers will push more gear into Hoonah Sound, Peril Strait and Chatham. This Hoonah Sound/Peril Strait area is small enough and adding 200-400 more crab pots is a recipe for conflict, lost gear and, of course, lost income.
- 3) Directly affects the entire southeast crab fishery when deciding length of season. Losing this prime area will decrease the total amount of crab caught in the first two weeks of the summer season which is used for deciding the length of the season.
- 4) This is a direct allocation grab. 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.
- 5) The process by which Proposal 201 was introduced and supported by the 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, we ask that Proposal 201 not be approved and voted down.

This monumental proposal puts local Sitka Dungeness crabbers and families at risk of losing crucial crab grounds and possibly their livelihoods. Thank you for your consideration.

Sincerely,

Andrew Friske - F/V Allure 907-738-3141

Jacob Friske - F/V Adria 907-738-9950

Jeff Wolfe - F/V Macushla 907-738-6300

Bill Grant - F/V Motley Crew 907-738-1270

Justin Peeler - F/V Defiant 907-340-6106

Carson Grant - F/V Sailor 907-738-6555

Shane Synder - F/V Maybe 907-738-3288

Brandon Snyder - F/V Half Moon 907-738-1913

Kenyatta Bradley - F/V Sea Mistress 907-738-0218

Greg Wallace - F/V Olivia 907-738-4058

Dave Coleman - F/V Emma C 907-752-0957

Eric Calvin - F/V Quick Silver 907-738-5070

Dan Ellingsen - F/V Summer Girl 907-738-0772

Evans Sparks - F/V Sentry 907-738-0273



Submitted By
Andrew H Scorzelli
Submitted On
12/18/2021 12:11:37 PM
Affiliation
Active troll permit owner



PC024
1 of 1

Hello , I have been a power troller in SE Alask and resident of Sitka , Alaska for 25 years. As such I am deeply disturbed by Proposition 83 and am strongly in opposition to it .

I am in favor of Proposition 144. Unguided charter boat fishers Should be required to submit log books. That should be a given. Why isnt that already happening? I am in favor of Proposition 80 requiring that individual gear and user groups be responsible for their own overages. Also about the ADFG Action Plan for Northern SEAAK King Salmon stocks of Concern, if trollers are to be shut down in areas of concern for spesces of concern, then sport fishers should be shiut down in those areas as well. We should all do our part , our fair share. Thank you.



Submitted By
Andrew Kittams
Submitted On
12/21/2021 9:33:54 PM
Affiliation
owner/operator

My name is Andrew Kittams. I am G01A permit owner and vessel owner from Petersburg AK. I was the 1991 valedictorian of Petersburg High School and have a B.S. in Natural Resource Economics with a minor in Fisheries Science from Oregon State University. I worked for ADFG in my first winter/spring out of college, including the Sitka herring fishery. I began commercial fishing when I was 14 and have run my own seiner for the last 27 years. My crew are all Alaskan rural residents and two are Alaska natives. Another crewman is married to an Alaskan Native. We support eleven Alaskan children with revenue from the G01A fishery.

I am cosponsor of proposal 164 which would make the management of the G01A Sitka Herring Fishery into an Equal Quota Share system. I have polled the 47 permit holders in the fishery for their thoughts on my proposal and the results are as follows as of December 21, 2021:

One has not responded.

One does not support it.

Four were neutral, as they did not care either way.

Forty one supported the proposal.

The overwhelming support of proposal 164 shows the reality of need for change in our fishery. We need a safer fishery. We need a more manageable fishery. We need a fishery that maximizes the value of Alaska's resource. Proposal 164 will not put additional burden on ADFG in management of the fishery. In fact, it will make ADFG's job much easier because there will be very little chance of ever exceeding the GHL.

I look forward to testifying before your board in person in Ketchikan.

I will provide individual names and their support to the BOF during the meeting.

Thank you

Submitted By
Anna Cheng
Submitted On
11/17/2021 11:26:34 AM
Affiliation



PC026
1 of 1

I support the Sitka Tribe of Alaska's proposals: 156, 157, and 158.

Submitted By
Anna Laffrey
Submitted On
12/22/2021 8:19:36 PM
Affiliation



PC027
1 of 2

Phone
6168086548
Email
amlaffrey@alaska.edu
Address
504 Shennett Street
Sitka, Alaska 99835

Dear Alaska Board of Fisheries,

I am a local Fisheries student and young journalist from Michigan. I participated in the 2020 subsistence herring egg harvest, and I worked for just three weeks as a deckhand for a couple of trollers on the beautiful waterways of Lingít Aaní this summer. I recognize the many elders, culture bearers and students who have testified on this same issue for decades, and say gunalchéesh to the Tlingít people who have managed this resource since time immemorial.

As a young person, I feel that the status quo of State resource management is stifling the incredible potential this land offers for our food systems, economic health, and social and cultural wellbeing. The sac-roe herring fishery costs the state more money to operate than it produces funds for the state, according to Sitka Tribe of Alaska biologist Kyle Rosendale. Moreover, the Sitka Tribe of Alaska's lawsuit told the government that it does not have Tribal consent to conduct an opening on herring. Yet in recent herring fishing years, the Guideline Harvest Level has been raised to record levels. To me, the problem is not the Guideline Harvest Level, or any detail highlighted in these proposals. The problem is seining entire schools of herring before the females spawn, period. No matter how well you treat a tumor with bandaids, it will still kill you unless you remove it. While I appreciate efforts at advancing the fishery by Advisory Committee members like Heather Bauscher, I believe herring seining is not treatable by conducting new population surveys. Managing salmon traps and industrial clear cut logging did not work.

I support Proposals 156, 157 and 158 as common-sense measures to promote herring abundance. **I oppose proposals 159, 160 and 161** because they set out to harm local people's subsistence and place undue burden on people's freedom like new subsistence permitting. **I oppose proposals 162, 163, 164, 165, and 166** because they prefer the discovery of new, extended overseas markets to the satisfaction of local subsistence needs. Moreover, ADF&G biologist Aaron Dupuis says ADF&G does not know how combinations of these proposals might impact our ecosystem, and ADF&G does not have the resources to skillfully manage new tentacles of this fishery, like a pound fishery. This fishery is no longer a "shoot-out"; last year fishing was slow to begin and fell far short of its quota. Cooperative permitting has no benefit for the community; but allows for consolidation of labor and profits, producing fewer jobs.

The force of this fishery was founded on a luxury Kazunoko market in Japan. Demand for this delicacy holiday garnish is dwindling. Yet, as if by muscle memory, we still fish tons of our mature female herring in search of their valuable roe sacs each year, before they spawn in the spring. Up to 90% of all herring seined could be considered "byproduct" in this search for sac-roe, and is much less valuable as a product in its ground-up form than it is as a perfect package of oily, calorie-packed food for any creature in the food web.

State management is incredibly young, and our "pristine biomass" estimates launched long after the reduction fishery era irreversibly damaged local herring. The ADF&G herring research program launched in 1969, but ADF&G didn't survey herring beyond Katlian Bay until 1978. While Indigenous people call upon thousands of years of experience, the State wields about forty years of data, which includes many inevitable flaws and outdated surveys that warp our stock forecasts. In 1992, 5AAC 27.059 entrenched the State's collaboration with commercial markets when fishing herring; Japanese buyers accompany ADF&G on pre-season survey boats. The state's modeling process does not satisfy the local community, because the fishery does not serve us, and the State's practices do not assure us that stocks can withstand repeated commercial sac roe fisheries. Why should the community have faith, when State management has collapsed a dozen sister fisheries around the region?

Moreover, I believe the Alaska Department of Fish and Game is violating the United Nations Declaration on the Rights of Indigenous Peoples, especially Articles 19 & 20 (italics my own)

UN Declaration on the Rights of Indigenous Peoples Article 19: States shall consult and cooperate *in good faith* with the indigenous peoples concerned through their own representative institutions in order to obtain their *free, prior and informed consent before adopting* and implementing legislative or administrative *measures that may affect them*.

UN Declaration on the Rights of Indigenous Peoples Article 20: Indigenous peoples have the right to maintain and *develop their political, economic and social systems* or institutions, to be *secure in the enjoyment of their own means of subsistence* and development, and to *engage freely in all their traditional and other economic activities*. 2. Indigenous peoples deprived of their means of subsistence and development are entitled to just and fair redress."

We need a new way forward. We should not expand the area or duration of the fishery in a quest for new buyers of herring, and we should not give commercial seine boats permission to create their own new experimental pound (roe on kelp) fishery in Sitka Sound. Instead, we

should appreciate the opportunity to collaborate with Indigenous people who have studied this issue for millenia, involve students in rigorous research and slow the destruction of our herring until we actually collaborate with Indigenous stakeholders.



Submitted By
Anna Ro
Submitted On
12/22/2021 9:18:17 AM
Affiliation



PC028
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
Anna Zauner
Submitted On
11/16/2021 6:54:49 PM
Affiliation
Herring Protectors



PC029
1 of 1

I am writing to express my support for Sitka Tribe of Alaska and to profess my concern with the handling of the herring fishery by ADFG. There is a huge disparity in the reality of the herring population and the data that ADFG has used to inform their harvest counts. ADFG has candidly expressed their disinterest in using correct data and correctly assessing the viability of the ton count given to permittees. This situation is blatantly displaying how indigenous communities and their culture is being erased by the government. I am deeply concerned about this and want to condemn the current approach ADFG is taking on this fishery.



Submitted By
Anne Fuller
Submitted On
12/20/2021 11:37:37 PM
Affiliation

Phone
907 5864422
Email
fernleafgt@yahoo.com
Address
7943 N Douglas Hwy
Juneau, Alaska 99801

I support proposals 156, 157, and 158.

Management needs to change so we have bountiful returns of herring. I've known since I was a tiny girl that herring were used as bait for salmon and I've come to appreciate the importance of the species to many creatures in our waters. I am resident in Juneau and a visitor to Sitka.

Please consider that sustainable does not mean maximizing profit for the sac roe industry.

The Board of Fish should adopt policies that increase abundance. There should be provision for ample subsistence use. The proposals (156, 157, 158) do include traditional knowledge so that harvesting does not target elder fish

Proposals 163 (multiple permits) and 164 (making the quota just a recommendation) give much too much away to the commercial fishermen

Thank you for your attention. I've heard it said that every creature larger than a herring feasts on herring in the spring, so ask that you take steps to restore abundance for big fish, the birds and all the people.



Submitted By
Annette Rose Coomber
Submitted On
12/16/2021 4:44:11 PM
Affiliation

Phone
9736506469

Email
aries200@optonline.net

Address
33 Sweetwater Lane
RINGWOOD, New Jersey 07456

I am sending this comment in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

There used to be bountiful spawning herring populations throughout Southeast. But in the last 50 years, spawning grounds from Kah Shakes to Lynn Canal have collapsed under ADF&G management ... and not a single one has yet recovered. Why is this important? Herring are a keystone forage fish species and critical food for salmon, as well as other economically and culturally important species like humpback whales and harbor seals.

While the proposals being considered next month are not enough to undo the collapsed herring populations across Southeast, they are an important first step in protecting Sitka Sound's population — the last best herring spawning grounds in the region.



Via email
December 22, 2021

ADF&G, Boards Support Section
Juneau, AK 99811-5526
P.O. Box 115526
dfg.bof.comments@alaska.gov

Alaska Board of Fisheries
Attn: Executive Director
glenn.haight@alaska.gov

RE: Second Request to Schedule Consideration of Proposal 282 Issue Outside of March 2022 Meetings

On October 20, 2021 the Board accepted ACR 7 (now called Proposal 282) regarding changes to commercial fishing periods in the Shumagin Islands Section and Dolgoi Island Area for consideration at an upcoming Board meeting. On November 5, 2021, Area M Seiners Association submitted a letter to you requesting that ACR 7/Proposal 282 not be considered at the Board's March 11-18, 2022 meeting because the meeting dates conflict with the State-water Pacific cod fishery (5 AAC 28.081), in which a large proportion of Area M fishermen participate.

At the Board's December 6, 2021 meeting in Cordova, the Board considered Area M Seiners' request (PC014) and rejected it. In response to a request from the Chair, Executive Director Haight reported to the Board that CFEC records (RC122) show 21 permit holders hold both Area M *seine* permits and South Pen pot cod permits. The Board decided to not change the proposed schedule and Board Chair Carlson-Van Dort stated that there is plenty of opportunity for fishermen to express opinions and submit input.

The Board's decision was based on inaccurate information, which appears to have been solicited by the Chair in an attempt to downplay the scope of the scheduling conflict. The information was inaccurate in three respects.

First, as written, Proposal 282 requests restrictions on all gear types, not just seine gear. Thus, the scheduling conflict affects not just seine fishermen, but set and drift gill net fishermen as well. Based on CFEC data provided by ADF&G (attached), the number of Area M seiner, set net and drift gill net permit holders who also held cod permits was **79** in 2019, **57** in 2020 and **80** in 2021. By requesting and relying on data for seine permits only, the Chair substantially downplayed the extent of the conflict. (Notably, the CFEC data show that, even for seine permit holders the information presented to the Board was inaccurate; according to the CFEC, the number of Area M seine permit holders who also held cod permits was 28 in 2019, 27 in 2020 and 28 in 2021).



Letter Request to Reschedule Proposal 282
December 22, 2021

Second, by selecting 2020, the Chair downplayed the extent of the conflict. As the CFEC data show, the overlap in permit holders was significantly higher in 2019 and 2021. By selectively using data from 2020—the year in which the overlap was lowest in the last three years—the Chair presented biased data to the Board. This bias is compounded by the fact that the harvest limit for the cod fishery in 2022 is 24% greater than 2021, which will likely lead to greater participation by Area M salmon permit holders in the cod fishery.

Third, the information solicited by the Chair and presented to the Board also downplayed the extent of the conflict because the conflict is not limited to fishermen who hold permits in the Area M salmon fishery and the cod fishery. For example, some holders of Area M set net permits, who will be directly impacted by Proposal 282, do not hold cod permits but still participate in the cod fishery, either as crew on cod boats for other permit holders or in processing plants, and thus will be prevented from attending the Board meeting.

The fundamental goal of Proposal 282 is to further restrict Area M salmon fisheries. If the changes to 5 AAC 09.365(d) proposed by Proposal 282 are adopted by the Board, open fishing periods in June in the Shumagin Islands and Dolgoi Island Area could be reduced 35% for set netters and 41% for seiners and gillnetters from the current regulations and the Post-June fishery could be reduced 41% from the current regulations for all gear types. It is crucial that Area M fishermen—not just seiners, but all fisherman who participate in the June and Post-June fisheries—participate in the Board process for consideration of Proposal 282. Due process requires that these fishermen be afforded the opportunity to attend the Board meeting in person to protect their rights and their livelihoods, and to provide the Board with data and perspectives that are sorely lacking from the consideration of the Chignik sockeye issue thus far.

It would be contrary to State law and policy to require Area M fisherman to forgo a commercial cod season just to participate in the Board process where the Area M salmon season is being considered. The due process clause of the Alaska Constitution provides: “No person shall be deprived of life, liberty, or property without due process of law.” Alaska Const. art. I, § 7. “This clause requires that adequate and fair procedures be employed when state action threatens protected life, liberty, or property interests” Doe v. Alaska Dep’t of Pub. Safety, 444 P.3d 116, 124 (Alaska 2019). “The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.” Mathews v. Eldridge, 424 U.S. 319, 333 (1976). Due process requires that the Board ensure that Area M fisherman have the opportunity to be heard and to adequately represent their interests during the Board’s consideration of the Area M fisheries issues raised by Proposal 282. Thus, the Board should not schedule consideration of Area M issues at a time when Area M fishery participants will not be able to attend.

We respectfully request that you reconsider our request to re-schedule Proposal 282 for later in March or April to avoid the conflict presented by the current schedule, and that you do so on the basis of accurate and unbiased data. Thank you for your consideration.



Letter Request to Reschedule Proposal 282

December 22, 2021

List of permit holder possessing both an Area M salmon permit (S01M, S03M, or S04M) and a Pacific cod pot gear or jig gear permit (M09G, M09B, M26G, or M26B), by year, 2019–2021

2019		2020		2021	
Permit holder	CFCF ID	Permit holder	CFCF ID	Permit holder	CFCF ID
ALFIERI, MICHAEL JR.	425	ALFIERI, MICHAEL JR.	425	ANFILOFEV, TIMOFIY	591500
ARBELOVSKY, STACY	201502	ANDERSON, MARK T.	102612	ARBELOVSKY, STACY	201502
BARNETT, ROBERT M.	550462	ANFILOFEV, TIMOFIY	591500	BARNETT, ROBERT M.	550462
BENDIXEN, CRAIG H.	77370	BARNETT, ROBERT M.	550462	BENDIXEN, CRAIG H.	77370
BOUSLEY, TROY	732051	BENDIXEN, CRAIG H.	77370	BOUSLEY, TROY	732051
BROWN, PATRICK J.	715813	BOUSLEY, TROY	732051	BROWN, PATRICK J.	715813
CUMBERLIDGE, DANNY	835219	BROWN, PATRICK J.	715813	CALUGAN, PETER B.	235334
DEERING, BRAD W.	930990	CUMBERLIDGE, DANNY	835219	CUMBERLIDGE, DANNY	835219
EASTLICK, RICHARD E.	696280	DUSHKIN, WILLIAM N.	634929	DEERING, BRAD W.	930990
EUBANK, DONALD E.	86660	FOSTER, BRUCE JR.	73047	DELONG, DUSTIN	505951
FOSTER, ANDREW R.	193461	FOSTER, DWAIN A. SR.	214425	DUSHKIN, WILLIAM N.	634929
FOSTER, BRUCE JR.	73047	FOSTER, JACK R. JR.	68112	EASTLICK, RICHARD E.	696280
FOSTER, DWAIN A. SR.	214425	GALLIGAN, MICHAEL H.	558067	FEFELOV, IVAN	88788
FOSTER, JACK R. JR.	68112	GALOVIN, STEVEN W. SR.	833571	FOSTER, BRUCE JR.	73047
FOSTER, JOHN A. JR.	20637	GARDNER, JOHN P. III	324145	FOSTER, DWAIN A. SR.	214425
GALLIGAN, MICHAEL H.	558067	GOULD, DEAN	145003	FOSTER, JACK R. JR.	68112
GALOVIN, STEVEN W. SR.	833571	GOULD, ROBERT J. JR.	49495	FOSTER, JOHN A. JR.	20637
GALVIN, JOHN L.	10169	GOULD, ROBERT L.	254042	GALOVIN, STEVEN W. SR.	833571
GARDNER, JOHN P. III	324145	GOULD, STEVEN D.	590097	GALVIN, JOHN L.	10169
GOULD, DEAN	145003	GUNDERSEN, CHARLES K.	764124	GARDNER, JOHN P. III	324145
GOULD, ROBERT J. JR.	49495	GUNDERSEN, KIM L.	264753	GOULD, DEAN	145003
GOULD, ROBERT L.	254042	GUNDERSEN, MARTIN H.	316593	GOULD, ROBERT J. JR.	49495
GOULD, STEVEN D.	590097	GUNDERSEN, MARTIN H.	316593	GOULD, ROBERT L.	254042
GRONHOLDT, PETER N. JR.	560205	GUNDERSEN, WAYNE K.	289583	GOULD, STEVEN D.	590097
GUNDERSEN, CHARLES K.	764124	HINTON, JOE	769419	GUNDERSEN, CHARLES K.	764124
GUNDERSEN, KIM L.	264753	HOBLET, TOM C.	160129	GUNDERSEN, KIM L.	264753
GUNDERSEN, MARTIN H.	316593	HOBLET, TRAVIS S.	508831	GUNDERSEN, MARTIN H.	316593
GUNDERSEN, WAYNE K.	289583	HOLMBERG, RAYMOND	917976	GUNDERSEN, WAYNE K.	289583
HINTON, JOE	769419	JACKSON, GEORGE E. JR.	717315	HINTON, JOE	769419
HOBLET, IVAN	766602	JACOBSEN, DICK	621889	HOBLET, TOM C.	160129
HOBLET, TOM C.	160129	KALMAKOFF, ARTEMIE JR.	250462	HOLMBERG, ARTHUR J.	731792
HOLMBERG, ARTHUR J.	731792	KUZMIN, FADEY	246687	HOLMBERG, RAYMOND	917976
HOLMBERG, RAYMOND	917976	LUNDGREN, TAYLOR	814681	JACKSON, CHARLES	539108
JACKSON, GEORGE E. JR.	717315	MACK, KENNETH JR.	570575	JACKSON, CHARLES W.	846494
JACOBSEN, DICK	621889	MACK, KENNETH B. SR.	508669	JACKSON, GEORGE E. JR.	717315
JOHANNESSEN, NORMAN E.	858038	MARTISHEV, DAVID I.	385365	JACOBSEN, DICK	621889
JOHANSEN, ROBERT	332693	MARTISHEV, IOSIF	741457	KALMAKOFF, ARTEMIE JR.	250462
JOHNSON, ROBERT M.	208976	MARUNDE, BRADY	577185	KUSNETSOV, ANDREAN I.	601690
KALMAKOFF, ARTEMIE JR.	250462	MCCALLUM, DON C.	425874	LARSEN, ROBIN	758721
KUZAKIN, NORMAN L.	983873	MITCHELL, ALLEN	346626	LUNDGREN, TAYLOR	814681
LARSEN, ROBIN	758721	NEWTON, GRANT L.	350279	MACK, KENNETH JR.	570575
LUNDGREN, TAYLOR	814681	NYBERG, ROBERT B.	621362	MACK, KENNETH B. SR.	508669
MACK, JEREMY J.	119236	PEDERSEN, DALE E.	431641	MANOS, ANDREW G.	540272
MACK, KENNETH JR.	570575	PEDERSEN, DEAN	497450	MARTISHEV, IOSIF	741457
MACK, KENNETH B. SR.	508669	PENDERGRAFT, LEO	998324	MARUNDE, BRADY	577185
MARTISHEV, IOSIF	741457	POLUSHKIN, DAVID	920630	MCCALLUM, DON C.	425874
MARUNDE, BRADY	577185	REUTOV, ANDREY	482055	MEDINA, JOSE F. JR.	43633
NEWTON, GRANT L.	350279	REUTOV, GREGORY	437906	MITCHELL, ALLEN	346626
NYBERG, ROBERT B.	621362	SAMUELSON, HERMAN E.	120244	NEWMAN, ALVIN J. JR.	207618
OGATA, DUKE	238835	SHURAVLOFF, PETER A.	127281	NEWTON, GRANT L.	350279
OGATA, RAYMOND	871798	SMITH, BRANDON J.	667600	NUTT, RAYMOND E.	196636
PEDERSEN, DALE E.	431641	SPARLIN, R.DREW JR.	32861	NYBERG, ROBERT B.	621362
PEDERSEN, DEAN	497450	THOMPSON, KILEY	464990	PEDERSEN, DALE E.	431641
PENDERGRAFT, LEO	998324	VERG.IN, RHY	502502	PEDERSEN, DEAN	497450
POLUSHKIN, ARSENY	508935	WENZEL, CHRISTOPHER J.	404747	PENDERGRAFT, LEO	998324
POLUSHKIN, DAVID	920630	WILSON, ANDREW	161349	POLUSHKIN, DAVID	920630
PORTER, VIRGIL	759607	WILSON, JUSTIN C.	204415	REUTOV, ALEXANDER E.	806565
REUTOV, ANDREY	482055	WILSON, WARREN E.	456400	REUTOV, ANDREY	482055
REUTOV, DAVID	241799	Count	57	REUTOV, ARSENY D.	285025
REUTOV, FEODOR I.	888279			REUTOV, DAVID	241799
REUTOV, GEORGE	370817			REUTOV, DIMITRY L.	702970
REUTOV, GREGORY	437906			REUTOV, FEODOR I.	888279
REUTOV, MAVRIK S.	909780			REUTOV, GEORGE	370817
SAGER, BILL R.	85977			REUTOV, GREGORY	437906
SAMUELSON, HERMAN E.	120244			REUTOV, KIRICK S.	1999
SHURAVLOFF, PETER A.	127281			REUTOV, MAVRIK S.	909780
SMITH, BRANDON J.	667600			REUTOV, SERGEI F.	512265
SMITH, JIM R.	551899			REUTOV, TIMON S.	719334
SPARLIN, R.DREW JR.	32861			SAGER, BILL R.	85977
STOVER, MATTHEW H.	114980			SAMUELSON, HERMAN E.	120244
THOMPSON, KILEY	464990			SHURAVLOFF, PETER A.	127281
VERG.IN, RHY	502502			SMITH, BRANDON J.	667600
WAGNER, MARK J.	50981			SMITH, KARL	437939
WENZEL, CHRISTOPHER J.	404747			SNEGIREV, VARIFALAMEI A.	753934
WILLIAMS, KEITH	710908			SPARLIN, R.DREW JR.	32861
WILSON, ANDREW	161349			THOMPSON, KILEY	464990
WILSON, DAVID R. JR.	47539			VERG.IN, RHY	502502
WILSON, JUSTIN C.	204415			WILSON, ANDREW	161349
WILSON, WARREN E.	456400			WILSON, JUSTIN C.	204415
Count	79			WILSON, WARREN E.	456400
				Count	80



Letter Request to Reschedule Proposal 282

December 22, 2021

List of permit holder possessing both an Area M salmon seine permit (S01M) and a Pacific cod pot gear permit (M09G or M09B), by year, 2019–2021

2019		2020		2021	
Permit holder	CFEC ID	Permit holder	CFEC ID	Permit holder	CFEC ID
ALFIERI, MICHAEL JR.	425	ALFIERI, MICHAEL JR.	425	CUMBERLIDGE, DANNY	835219
FOSTER, ANDREW R.	193461	ANDERSON, MARK T.	102612	DZIEDZIC, MATTHEW	258950
FOSTER, BRUCE JR.	73047	DZIEDZIC, MATTHEW	258950	FOSTER, BRUCE JR.	73047
FOSTER, DWAIN A. SR.	214425	FOSTER, BRUCE JR.	73047	FOSTER, DWAIN A. JR.	935163
FOSTER, JACK R. JR.	68112	FOSTER, DWAIN A. JR.	935163	FOSTER, DWAIN A. SR.	214425
FOSTER, JOHN A. JR.	20637	FOSTER, DWAIN A. SR.	214425	FOSTER, JACK R. JR.	68112
GALLIGAN, MICHAEL H.	558067	FOSTER, JACK R. JR.	68112	FOSTER, JOHN A. JR.	20637
GALOVIN, STEVEN W. SR.	833571	GALLIGAN, MICHAEL H.	558067	GALOVIN, STEVEN W. SR.	833571
GOULD, DEAN	145003	GALOVIN, STEVEN W. SR.	833571	GOULD, DEAN	145003
GOULD, ROBERT L.	254042	GOULD, DEAN	145003	GOULD, ROBERT L.	254042
HOBLET, IVAN	766602	GOULD, ROBERT L.	254042	HOBLET, TOM C.	160129
HOBLET, TOM C.	160129	HOBLET, TOM C.	160129	HOLMBERG, ARTHUR J.	731792
HOLMBERG, ARTHUR J.	731792	HOBLET, TRAVIS S.	508831	JACOBSEN, DICK	621889
JACOBSEN, DICK	621889	JACOBSEN, DICK	621889	LARSEN, ROBIN	758721
JOHANNESSEN, NORMAN E.	858038	JOHANNESSEN, NORMAN E.	858038	LUNDGREN, TAYLOR	814681
JOHNSON, ROBERT M.	208976	LUNDGREN, TAYLOR	814681	MACK, KENNETH JR.	570575
LARSEN, ROBIN	758721	MACK, KENNETH JR.	570575	MACK, KENNETH B. SR.	508669
LUNDGREN, TAYLOR	814681	MACK, KENNETH B. SR.	508669	MANOS, ANDREW G.	540272
MACK, KENNETH JR.	570575	MANOS, ANDREW G.	540272	MCCALLUM, DON C.	425874
MACK, KENNETH B. SR.	508669	MCCALLUM, DON C.	425874	NEWMAN, ALVIN J. JR.	207618
PEDERSEN, DALE E.	431641	PEDERSEN, DALE E.	431641	NUTT, RAYMOND E.	196636
PEDERSEN, DEAN	497450	PEDERSEN, DEAN	497450	PEDERSEN, DALE E.	431641
SAMUELSON, HERMAN E.	120244	SAMUELSON, HERMAN E.	120244	PEDERSEN, DEAN	497450
THOMPSON, KILEY	464990	THOMPSON, KILEY	464990	SAMUELSON, HERMAN E.	120244
WILLIAMS, KEITH	710908	WILLIAMS, KEITH	710908	THOMPSON, KILEY	464990
WILSON, ANDREW	161349	WILSON, ANDREW	161349	WILLIAMS, KEITH	710908
WILSON, DAVID R. JR.	47539	WILSON, JUSTIN C.	204415	WILSON, ANDREW	161349
WILSON, JUSTIN C.	204415	Count	27	WILSON, JUSTIN C.	204415
Count	28			Count	28

Letter Request to Reschedule Proposal 282
December 22, 2021

Sincerely,

The undersigned

Name	Stakeholder	Affiliation	Community	Date
Peter Schonberg	Fisherman	Area M seiner	King Cove	12/20/2021
Paula Calugan	Community Member	Small Business Owner	Sand Point	12/20/2021
Gary Hennigh	Local Government	City of King Cove	City of King Cove	12/20/2021
David Wilson	Fisherman	Area m seiners	Sand point	12/21/2021
Ben Ley	Fisherman		King Cove, AK	12/21/2021
Daniel Castle	Fisherman			12/21/2021
Tom Hoblet, Carlin Hoblet, Travis Hoblet, Ivan Hoblet	Fisherman	False Pass Advisory Committee Member	False Pass, Ak 99583	12/21/2021
Steve Brown	Fisherman	Concerned Area M Fishermen		12/21/2021
Glen Gardner Jr.	Community Member		Sand Point	12/21/2021
Peter Hamre	Fisherman	Seine Permit holder, cod crew member		12/21/2021
Dimitri Philemonof, APIA President/CEO	Aleutian Pribilof Islands Association (APIA) is a non profit Tribal Consortium	the 13 tribes in the Aleutians and Pribilof Islands Region	Sand Point, King Cove, Unalaska, Akutan, Atka, Paulof Harbor, Unga, Belkofski, False Pass, St. Paul, St. George, Nelson Lagoon	12/21/2021
Buck Laukitis	Fisherman		Homer	12/21/2021
Joseph Puratich	Fisherman		Sand Point	12/21/2021
Dean Pedersen	Fisherman		Sand Point	12/21/2021
Melanie Hoblet	Community		False Pass	12/21/2021



Letter Request to Reschedule Proposal 282
December 22, 2021

	Member			
Alex Jackson	Fisherman	Owner / crew member Fv Karen Evich	Sand Pt	12/21/2021
Keith Williams	Fisherman			12/21/2021
Jasper Allbrett	Fisherman	Seiner		12/21/2021
Jamie M Wurtz	Fisherman	Area M Seine permit holder and fisherman		12/21/2021
Taylor j.Lundgren	Fisherman	Fv Temptation	Sand Point, area m	12/21/2021
Mike Alfieri	Fisherman			12/21/2021
Steven Galovin, SR	Fisherman		Sand Point	12/21/2021
Dick Jacobsen	Fisherman			12/21/2021
Scott Thorne	Fisherman	Member. Area M Seiners		12/21/2021
Julian Lucas Manos	Fisherman	Lady Elias LLC	King Cove	12/22/2021
Nate Rose	Concerned citizen	Kodiak Seiners Association	Kodiak	12/22/2021
andrew gus manos	Fisherman		king cove	12/22/2021
Aaron Severson	Fisherman	Seiner	Petersburg	12/22/2021



Letter Request to Reschedule Proposal 282
December 22, 2021

Sincerely,

Kiley Thompson
Area M Seiners Association

John A. Foster

Name: JOHN A. FOSTER
Organization/Affiliation: AREA M SETNETTER
PRES. UWOGA TRIBAL COUNCIL

Allen [unclear]
Name: HARBOR MASTER
Organization/Affiliation:

James Brown
Name: JAMES BROWN
Organization/Affiliation: R ID GEORGE'S APARTMENT

Randy [unclear]
Name: Harbor work
Organization/Affiliation:

[unclear]
Name:
Organization/Affiliation:

Sergei Prokhorov
Name:
Organization/Affiliation: CREW / FISHERMAN

Charles C. Gundersen
Name:
Organization/Affiliation:

John Galvin
Name: JOHN GALVIN
Organization/Affiliation: AREA M SETNETTER

amy m [unclear]
Name: Area M set netter
Organization/Affiliation:

Jack E. [unclear]
Name: Area M Setnetter / seiner
Organization/Affiliation:

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:



Letter Request to Reschedule Proposal 262
December 22, 2021

Sincerely,

Kiley Thompson
Area M Seiners Association

Hana Joann
Name: HANA JOANN
Organization/Affiliation:

K. Thompson
Name: F/V Pacific Quest
Organization/Affiliation:

Hana Joann
Name: HANA JOANN
Organization/Affiliation:

Justin Wilson
Name: Justin Wilson
Organization/Affiliation: F/V Just In Case

SKY
Name:
Organization/Affiliation:

St Frances
Name: FV ST FRANCES
Organization/Affiliation:

SKY
Name:
Organization/Affiliation:

Charles Mack
Name: Charles Mack
Organization/Affiliation: King Cove Harbor master

SKY
Name:
Organization/Affiliation:

Sharon Trank
Name: FV Sharon Trank
Organization/Affiliation:

SKY
Name:
Organization/Affiliation:

Darion Uttecht
Name: F/V Northern Star (crew)
Organization/Affiliation:

Miss Roxanne
Name:
Organization/Affiliation:

Advantage
Name: F/V Advantage
Organization/Affiliation:

SKY
Name:
Organization/Affiliation:



Letter Request to Reschedule Proposal 282
December 22, 2021

Jason Mack
Name: Murray Mack
Organization/Affiliation:

[Signature]
Name:
Organization/Affiliation:

Craig Bendixen Bendit
Name:
Organization/Affiliation:

Avahie P-E Gould
Name:
Organization/Affiliation:

Jon Samuelson
Name:
Organization/Affiliation:

Ashten Gould
Name:
Organization/Affiliation:

Avery Samuelson
Name:
Organization/Affiliation:

Herman Bendixen
Name:
Organization/Affiliation:

Conner Samuelson
Name:
Organization/Affiliation:

[Signature]
Name:
Organization/Affiliation:

Eric Samuelson
Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Randy Samuelson
Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Don Hall
Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

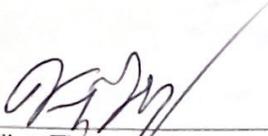
[Signature]
Name: Andrew Wilson
Organization/Affiliation: Miss Cathy Kim

Name:
Organization/Affiliation:

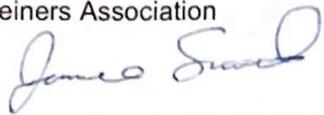


Letter Request to Reschedule Proposal 282
December 22, 2021

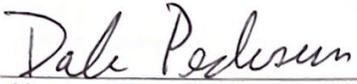
Sincerely,



Name: Kiley Thompson
Organization/Affiliation: Area M Seiners Association



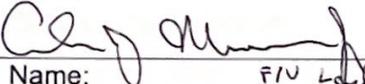
Name: James Smith, Mayor
Organization/Affiliation: Sand Point



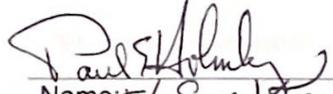
Name: Dale Pedersen
Organization/Affiliation: F/V CELTIC



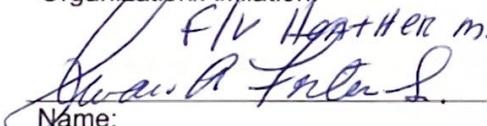
Name: Art Holmberg
Organization/Affiliation: F/V TERN



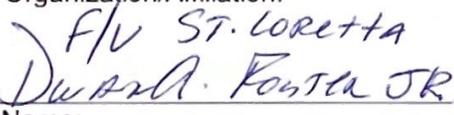
Name: Craig Manning
Organization/Affiliation: F/V LARRY JACKSON



Name: Paul Holmberg
Organization/Affiliation: F/V SEA KING INC.



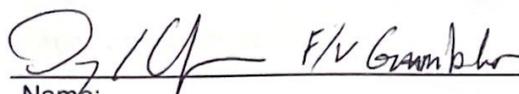
Name: Duane A. Foster Sr.
Organization/Affiliation: F/V HEATHER MARSONE



Name: Duane A. Foster Jr.
Organization/Affiliation: F/V ST. LORETTA



Name: Alvin D. Osterback, Mayor
Organization/Affiliation: Aleutians East Borough



Name: F/V Grampko
Organization/Affiliation:

Name:
Organization/Affiliation:



Letter Request to Reschedule Proposal 282
December 22, 2021

M. K. ...
Name:
Organization/Affiliation:

Temptation Inc
Name:
Organization/Affiliation:

David Osterback
Name:
Organization/Affiliation:

Osterback Inc. (Pacific Mail)
Name:
Organization/Affiliation:

Name:
Organization/Affiliation:



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 Seward, Alaska, and while I don't participate in the region's salmon fisheries, in general I do support Alaska's hatchery production.

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.

Each year, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

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,

Arne Hatch
aahatch@ak.net
(907) 362-1387

Submitted By Artemis Klejka
Submitted On
12/22/2021 3:53:41 PM
Affiliation



PC034
1 of 1

I am writing in opotion to excessive herring fishing and limmiting substinces rights. I am in favor of proposals 156,157 and 158. which would help lead to a better managed herring fishery. Not overfishing herring seems like a no brainer in a lot of ways. the fishery is not the money machine for commercal it once was and it does more damage to the enviorment than it brings to the econnamy. We should work to improve the size of the overall herring population.



Submitted By
Aurora Taylor
Submitted On
3/15/2021 3:14:08 PM
Affiliation

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Address
179 Price St. Apt B
Sitka, Alaska 99835

Introduction: I am a Sitka resident and a lifelong Alaskan from Eagle River. I actively participate in subsistence and sport fisheries in the Sitka area. I ask all board members to consider subsistence needs, cultural importance, and long-term sustainability of fish populations when considering each proposal. I have identified the proposals most important to me and detail my stances below.

Proposal 156: Support

Proposal 156 seeks to reduce the amount of commercial allowable harvest by restructuring the current thresholds for quotas. It is a solution to the problem of decreased herring and a prudent measure to prevent the collapse of the largest commercial roe fishery in the Southeast. Historic stock collapses across the Southeast serve as a warning of the dangers of over-harvest. By changing the harvest control rule as proposed, the Board would safeguard herring from further population decline and potential collapse. It would further acknowledge indigenous voices, respecting the Tlingit nation. In addition to ensuring the stock's sustainability and acknowledging cultural importance, this proposal would benefit all marine mammals and fish which rely on herring in their diet, including sea lions, whales, salmon, halibut, and more. By protecting the herring stock from over-harvest, this proposal protects the marine ecosystem and the tourism industry (whale watching tours, e.g.) which is of critical importance to Sitka residents and the entire Southeast.

Proposal 157: Support

I support Proposal 157 as an effort to account for age class within the current allowable harvest.

Proposal 158: Support

I support Proposal 158 as an effort to account for age class within the current allowable harvest.

Proposal 160: Oppose

The intent of Proposal 160 is to reduce the closed area near Sitka. Considering subsistence needs, access to herring roe on kelp and branches is vitally important. Many residents cannot afford boats for remote access. Preserving the current closure will support the residents without means to a boat by protecting spawning areas connected to the road system in town. Residents who cannot afford boats for remote access are the same people who rely on subsistence the most to save money on groceries. Opening this area would harm subsistence users, who have very limited access compared to commercial fisherman who can go where they please within the current management area.

Proposal 162: Support

Proposal 162 would allow subsistence harvesters to gather spawn-on-kelp in a single trip, saving time, effort, and gas money which are critical to Sitka residents who rely on subsistence activity as a source of food. I support it fully and hope the Board recognizes the benefits of changing the annual possession limits to reflect wet-lock box capacity, making in-field measurements more accurate.

Proposal 165: Oppose

I oppose Proposal 165 due to my and my communities concerns for the sustainability of the herring fishery. Allowing for harvest of the uncaught quota from the Sitka Sound herring sac roe fishery will further affect the populations age class and reduce the future returns. Having a long-term sustainable commercial operation is more prudent than a short-term boom and bust industry.



Submitted By
Autumn Simons
Submitted On
12/22/2021 3:42:12 PM
Affiliation

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Address
914 Calhoun Ave
Apt 2
Juneau, Alaska 99801

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.

I implore you to heed the words of the people, especially the people who have been the stewards of this land since time immemorial.

Submitted By
Axel
Submitted On
12/10/2021 11:13:37 AM
Affiliation



PC037
1 of 1

Hi,

My name is Axel and I am 7 years old and I live in Sitka. I am learning about herring because I am homeschooled. I snorkle in the ocean with my dad and I really love Sitka with all the animals that are around here. Birds, seals, whales and all of those animals need the herring to survive. We need to think about the herring, but actually more importantly think about all the animals that depend on the herring. All the fish that we eat and even sell and send down to lower 48 need herring to eat. Salmon, halibut, black cod! What would AK be without all this delicious fish??? I was just telling my mom that it seems like the Tlingit people knew how to eat and harvest the herring for thousands of years without destroying the herring. The people survived and the herring survived. Now we have lost most of the herring in SouthEast because of over fishing. Sitka is now our last chance to make sure we can save herring from extinction. Please make sure to support: proposal 156, 157, 158 and oppose 159, 160, 161, 163, 164, 165. I am 7 and I want to make sure that when I am old there will still be herring in the ocean! Thank you. From Axel Minks!



Submitted By
Barbara J Anderson
Submitted On
12/15/2021 12:04:55 PM
Affiliation

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Sitka, Alaska 99835

I support proposal 156, 157 & 158. I oppose proposal 159, 160, 161, 163, 164, & 165. The herring have always been important to us. It's our culture, our heritage, our ecosystem, our food. We travel to not only to other Alaska towns but throughout the United States to make sure our families & especially our elderly may feast on their Native food..the herring. Now I'm old...I think back to those earlier days of fishing herring on the Sonar, the Claudia H & the Alice H, all Sonny Enloe seiners. You could feel the excitement in the air as we searched for "the set." Sonny Enloe at the helm & myself counting down to the last second to make sure all rings were on board by deadline of short opening. This is what we lived for..our herring.



Submitted By
Becca Merriman-Goldring
Submitted On
12/22/2021 8:24:25 PM
Affiliation

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571-594-6097

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merrigold@gmail.com

Address
4505 Cedar Springs Rd
Apt 115
Dallas, Texas 75219

Hello, I write to you in support of proposals 156, 157, and 158. These proposals are rooted in scientific and traditional knowledge, and come from a place of respect for the herring, Indigenous sovereignty, and existing protections in Alaska state law for Alaska Native subsistence practices. Limiting the commercial harvest in lean years (proposal 156) and reducing the likelihood that populations of older herring dip below sustainable levels (157 and 158) will help stem the decline of herring populations in the Sitka Sound, ensuring access to herring roe for generations to come. Proposals 159, 160, 161, 163, 164, 165, 166, in contrast, are rooted in a desire for short-term profits at the expense of the wellbeing of herring populations and subsistence users. Expanding the area open to commercial fishing (proposals 160 and 165), allowing multiple permits to be used by a single vessel (163), and broadening the allowable usages for any unharvested quota (165) all increase the likelihood of catastrophic overfishing, risking provoking a population crash in line with what has been seen in other Alaskan fisheries. These proposals also disregard the needs of subsistence users, calling for the removal of the Alaska Department of Fish and Game's obligation to distribute the commercial harvest to ensure reasonable opportunity for subsistence users (159), the reduction of the already small near-town area that is reserved for subsistence fishing (160), and the erection of further barriers to access to traditional harvesting methods (161). The Board of Fisheries has a moral, ethical, and legal (Alaska Const. art. VIII § 4, AS 16.05.258) obligation to ensure the longterm wellbeing of herring populations and the continued access of subsistence users to roe harvesting. In service of those responsibilities, I urge you to support proposals 156-158, and oppose proposals 159-161 and 163-166. Thank you,
Becca Merriman-Goldring

Submitted By
Ben Hughey
Submitted On
12/17/2021 7:08:20 AM
Affiliation



PC040
1 of 1

I'm writing to express my solid support for the proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska.

In a time of changing ocean conditions due to climate change, we can't afford not to manage our fisheries conservatively. Herring are a foundational species that support every other fishery in Sitka. Harvesting herring for maximum sustainable yield undercuts the natural abundance which could bolster population resilience for salmon, halibut, cod, mammals, and birds. These common sense proposals are the bare minimum for herring conservation.

Equally, I would like to state my opposition to proposals 159, 160, 161, 163, 164, and 165 submitted by the sac roe industry. These proposals do not acknowledge the deep value produced in subsistence harvests and they ignore the traditional indigenous knowledge that urges caution in management. Increasing harvest for profit in the short term could have long term devastating impacts.

Submitted By
Benjamin Campen
Submitted On
12/21/2021 9:37:07 AM
Affiliation



PC041
1 of 4

I, Benjamin Campen, active Alaska Power Troll gear card holder, support Proposal 80. Any harvest ceiling overages should be assigned and deducted from the gear group/fishery that exceeded their annual allocation NOT the all-gear harvest ceiling.

Submitted By
Benjamin Campen
Submitted On
12/21/2021 9:44:20 AM
Affiliation



PC041
2 of 4

I, Benjamin Campen, active Alaska Power Troll gear card holder, strongly oppose Proposal 83.

Submitted By
Benjamin Campen
Submitted On
12/21/2021 9:54:37 AM
Affiliation



PC041
3 of 4

I, Benjamin Campen, active Alaska Power Troll gear card holder, support Proposal 89 to allow the use of 6 lines during chinook non-retention periods for permit holders who either hold two power troll permits or enter into a dual permit agreement.

Submitted By
Benjamin Campen
Submitted On
12/21/2021 10:06:09 AM
Affiliation



PC041
4 of 4

I, Benjamin Campen, active Alaska Power Troll gear card holder, support Proposal 144 to establish a logbook program for rental vessels engaged in sportfishing.



Submitted By
Benjamin Lawrie
Submitted On
12/22/2021 5:29:52 PM
Affiliation

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339 Wortman Loop
Sitka, Alaska 99835

Members of the Board of Fisheries,

I am a lifelong Alaskan and second generation, life long commercial fisherman. I primarily earn my living in the summer months trolling for king and coho salmon but have participated in many different fisheries in my lifetime.

I support Proposal 80. I would like to see each gear group held to their annual allocation with the only exception to this being if a gear group would need to exceed it's annual allocation to provide Alaska to reach the all gear quota.

I support Proposal 82 with the amendments outlined by the Sitka advisory committee. I am in favor of continuing in season management of the sport fleet.

I strongly oppose Proposal 83. With an ever growing charter industry this proposal will effectively reallocate king salmon from one user group to another.

I support Proposal 89. This proposal is a great way to offer the troll fleet potential for more economic opportunity. I see this as a great way for fishermen to team up on a single boat or expand potential in a single operation. I do not think this would drive the cost of a permit up much if any and even if it did the permit is a minor part of the financial burden of a viable trolling operation. A capable boat is the real financial obstacle. I do not see this 6 line option having a measurable effect on the CPUE data. Many years of experience has shown me that given boats fishing in a given area can and do have very large discrepancies in catch rates.

Thank you for your consideration,

Benjamin Lawrie



Submitted By
Benjamin Timby
Submitted On
10/26/2021 6:03:18 PM
Affiliation

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1403 Halibut Point Rd
Sitka, Alaska 99835

As a young person who has spent over a decade in the fisheries, it distresses me greatly that the State of Alaska still manages herring as if it were not a forage fish, which is unanimous amongst all other state and scientific bodies around the world. Why do we continue to commercially harvest a keystone species that directly diminishes the health of our ecosystem and the harvest weights of other commercial species? And for what? A fishery that ships all the herring eggs overseas and is barely even economically viable? Not to even mention the cultural costs on the Native community. They've watched what was once an economy of abundance turn into an economy of scarcity under this form of management. It's time we set aside the greed and reckless extraction and really made some decisions in the interest of enriching the ecosystem, rather than pillaging every last morsel of it and keeping it barely alive on the verge of collapse. It's time to set new precedents that are in line with global science and fisheries management, as well as in line with traditional knowledge and cultural value from the Alaska Native community - prioritizing subsistence and long-term ecosystem healing over short-sighted exploitation. For these reasons, I support Proposals 156, 157, and 158 and strongly oppose Proposals 159, 160, 161, 163, 164, and 165.



From: [Bert Bergman](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Oppose Proposals 101, 103
Date: Wednesday, December 8, 2021 9:50:34 AM

My name is Bert Bergman. I am a Sitka resident, commercial fisherman, and a troll representative on the Northern Southeast Regional Aquaculture Association(NSRAA) board of directors.

NSRAA Crawfish release is of important economic driver for myself, the city of Sitka and the whole region. Last year chum production from Crawfish was a major factor in the troll fleet finally reaching our allocation target approved by the Board of Fisheries(BOF). The NSRAA Sitka area chum production provided about 4 million in value just to the troll fleet. That money is vital to processors like Sitka's Seafood Producers Cooperative, of which I am an owner/member. NSRAA helps the City of Sitka pay for infrastructure like docks, power generation, and contributes raw fish tax to our annual budget.

Crawfish is an important cost recovery site to keep NSRAA solvent. Since Crawfish is a relatively new site there initially was a learning curve involving how the fish returned. Factors like a wet vs. dry summers has caused some need to adapt. NSRAA while working closely with ADFG have used cost recovery and selective commercial fisheries as a tactic to minimize straying to great success. There still is options like operating a weir if further efforts need to be employed.

In my view ADFG did not violate policy by permitting Crawfish. West Crawfish had been a coho release site dating back to the early 1990's. Although that program has been discontinued the logic used to permit the area is far from new. The Crawfish region is steep mountainous terrain with short watersheds containing relatively small fish populations. Although West Crawfish does have an ADFG indicator early summer chum run, the stock NSRAA uses in a late summer stock providing a temporal difference. The two stocks can be managed separately.

It is not the job of the BOF to enforce the wilderness act. But Baranof Is. is filled with wilderness areas. It's important to find economic opportunities that reflect the intent of keeping wild areas special while still supporting communities. The cost benefit ratio seem acceptable given the short period of the year boats operate in the region. Local brown, bear, eagle and sea lion populations that make wilderness areas special all benefit from the site.

I resent out of region organizations trying to bankrupt local fishermen with pseudo science. I don't go to Fairbanks or Homer and try to bankrupt family owned businesses. Our hatchery system was established with funding to mitigate fishing reduction from the Pacific Salmon Treaty. Knowing that habitat destruction in the lower 48 would require reductions in SE AK fisheries our nonprofit hatcheries were built. Our region is financially dependent on their success. In SE the state can't control what happens with our watersheds. Canada can permits as many big mining and logging operations as they want with questionable water quality standards. The federal government controls much of the instate watersheds. To insure local fishermen have an economy hatcheries are a necessity.

Our hatcheries have gone through cycles of more and less productivity. Some sites have evolved to become expensive feeding stations for humpback whales and other predators. It's important to rotate release sites to keep ahead of predators. Crawfish was such an effort. ADFG is to be commended not chastised for attempting to work toward that goal. I oppose proposal 101 and 103.

Thank you for your time.

Bert Bergman
F/v Minke

801 Charles St.
Sitka, AK. 99835
907 738 6691
b.r.bergmam@att.net

Sent from my iPad



PC044
2 of 2



Submitted By
Bethany Goodrich
Submitted On
12/22/2021 4:16:32 PM
Affiliation

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500 Lincoln Street Unit B7
Sitka, Alaska 99835

Thank you in advance for hearing and considering my comments. For the last eight years I have been building a life and home in Sitka, Alaska. When I first arrived to town it was at the onset of herring season which became the most incredible welcoming to a place I would quickly fall in love with and dedicate my work and life to the stewardship and care of. I work with a collective impact network called the Sustainable Southeast Partnership which is **is a dynamic collective uniting diverse skills and perspectives to strengthen cultural, ecological, and economic resilience across Southeast Alaska**. For 8 years I have worked with this group to match storytelling, communications and outreach with our mission and vision for a healthier, more equitable, and sustainable Southeast. Through my work, my studies, and my personal life, I have been out on the water learning, documenting, and understanding the herring fishery and the cultural harvest (which extends far beyond the original collection of eggs both forward and backward).

Before moving to Alaska I was studying for and received a Masters of Science in Biodiversity, Conservation & Management from the University of Oxford where I first met and began collaborating with Thomas Thornton who is now the Dean of Arts and Sciences at UAS but who at the time was running the sister program in the School of Geography at Oxford. He shared with me and his students his experiences working with ADF&G and his extensive studies into Pacific herring. He has now authored several large research books on this work.

As a freelance journalist I have authored 3 articles published in the Anchorage Daily News, Juneau Empire, and Whetstone Magazine all on the changes and threats to Sitka's herring and the lives they impact. Through all of this research, interviews, and experiences on the water, I am deeply concerned about the current approach to management. The model itself was not developed to be used on such a concentrated scale focused entirely on Sitka Sound which has become the final stronghold for this critical fish.

The baseline we manage to is set to an already depleted herring stock. The significance of herring to the Indigenous and rural cultures of Southeast Alaska are enormous and difficult for me to even touch on in a comment. The significance of herring as a foundation of our ecosystems and our economies (salmon, whales, tourism, etc.) is enormous.

I firmly believe we should be adopting a precautionary principle and adjusting the model to better reflect the significance of this cultural keystone forage fish. A single species focused model is outdated. In the face of increased changes to our climate and our oceans, there is too much uncertainty and the economic benefits are not significant enough for the risks.

The idea of herring being wasted and turned into fish food while sitting in a state that abhors and does not allow fish farming, feels absurd. I think this entire issue has, like so much sadly in our country, become a polarized battle where the obstinate are focused on not adapting with the times, regardless of the status quo not making social, environmental, or economic sense.

For these reasons I write **in support of proposals 156, 157, and 158** which would lead to more conservative 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.

Thank you for respecting our voices.

Submitted By
Bill Hanson
Submitted On
12/22/2021 7:56:11 AM
Affiliation
n/a



PC046
1 of 1

Dear Board of Fisheries,

I write today to urge you to take conservation measures to protect and conserve herring populations in Southeast Alaska. I have lived and worked, fished as a personal user, in Southeast Alaska for the last 40 years. I worked as a professional biologist for 17 years, part of my time with ADFG.

Management of herring populations must be very conservative, directed toward maintaining fully productive populations across all herring age classes.

This includes reducing and limiting commercial harvest of herring. I wish to remind the BOF of the critical importance of herring populations as foundational food and contributors to healthy Southeast Alaska marine ecosystems.

From the standpoint of users and harvest allocations, I place traditional use by Indigenous People as the top priority.

This is not simply an allocation and split of resources among different users. I urge you to adopt management measures and allocations that Fully Protect Traditional Users rather than commercial harvest.

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

Thank you,

Bill Hanson

Douglas, Alaska



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 Ketchikan, Alaska, and I participate in the sport and public use salmon fisheries of the Southeast region, and as a saltwater guide and charter operator. I've been in Ketchikan most of my life and have witnessed the contribution the hatcheries make. On low fish years for the wild stock it's essential to have the hatchery salmon for commercial, sport, and guided sport. It's common in my house to have fish 5-6 times a week. Salmon makes up most of that. The neighbors and family I share with depend on me also. The charter guests I take out all want to catch an Alaskan salmon or two on their Alaskan vacation. Without hatcheries the chances are much less for a bountiful trip.

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,

Bill Hartley
mrbill69@msn.com
(907) 617-3927



Submitted By
Bill Kane
Submitted On
8/2/2021 2:20:19 PM
Affiliation

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william.kane@outlook.com
Address
PO Box 240194
Juneau, Alaska 99824

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.

Metadata – SEAGO Chinook Harvest Estimate Tables by Tier

The SEAGO spreadsheet (New SEAGO King Data Request.xlsx) was provided by SEAGO and populated by applying the results of ADF&G's Simulation Matrix to calculate projected treaty harvests for individual tiers across time periods and by residency given varying bag and annual limit combinations.

Important Notes:

- The Simulation Matrix was developed using a time series of 2006-2019 Treaty performance accounting
 - The postseason AI was used to determine the appropriate Tier to correlate with each of the years during the time series
- After filling the Jan 2020 SEAGO data request, updates were made on the matrix. These modifications resulted in changes to the originally provided estimates, which were mostly minor. The original request has also been updated to reflect the following changes.
 - 2019 SWHS estimates were available so the 2019 SWHS estimate and RES/NonRes splits were used versus an estimate.
 - After discussions with the project biometrician, some modifications were done to some of the calculations used to simulate increases or decreases to annual and bag limits.
- This data request asked for two different scenarios, 1) as if there were no closures to the sport fishery, either regionally or by angler residency despite various types of closures having occurred in 4 years throughout the time series (2008, 2017, 2018, and 2019), and 2) as if there were inside wildstock closures for tiers G and H resulting in a 2 fish inside resident bag limit once the closure ended.
 - To simulate the harvest that would have been expected to occur (i.e., projection) during a closure, the harvest timing of similarly tiered years was used to fill in the nonexistent data.
 - To simulate inside wildstock closures, harvest was removed in those ports and time periods and an increased harvest to a bag limit of 2 by resident anglers in inside ports only was applied upon reopening. Harvest estimates were calculated using the requested nonresident bag and annual as the non-closure request.
- Bag and annual limit analyses were used to calculate projected treaty harvest levels by port, biweek, and each of the years in the time series. Creel data was used to evaluate bag limits only, while charter logbook data was used primarily for annual limit analyses. These calculations were adjusted in Jan 2021.
- The harvest projections for varying combinations of bag/annual limit incorporates the PSC Risk Factor Adjustment (a.k.a. ADDON) calculated each year and spread over each of the gear groups. The amount applied to the sport fishery has remained at about 2,000 fish regardless of Tier.
- Sport Allocations associated with Tier I are not determined by the CPUE; rather they are determined by the Commissioner given best available information and requirements to address domestic and PSC escapement goals. Therefore, no attempt to was made to populate harvest projections for Tier I.
- Sport Allocations associated with Tier C are based on an expansion from Tier D. There was no Tier C year in the data used (2006-2019); therefore, Tier C is calculated by increasing Tier D by a factor of 0.8971 which is the difference in the sport allocation between Tiers C and D ($61900/69000=0.8971$).
- As per the data request instruction, the calculation of Sport and Troll percentages were based on taking the total sport/troll allocation and subtracting the projected sport harvest per tier, assuming troll would harvest the remaining fish up to and not exceeding the allocation.
- The marine harvest creel program estimates harvest based on a 3-stage design estimating harvest by biweekly period. The start and end date of a biweek vary like statistical weeks used in commercial fisheries. The simulation adjusts real harvest based on desired modifications to bag and annual limits and calculates a mean over all years of a similar tier to smooth the natural interannual variability of harvest timing and strength. Each of these years will have varying start and end dates within the same biweek, but the variability each way is again smoothed by combining years. Therefore, the data provided represents biweekly estimates that approximately fit the designated date periods.



= % Gain to Sport
= % Gain to Troll

Non-Resident Bag and Annual Limits

(1/3 = 1 per day/3 annual etc.)

Resident Bag Limit	Non-Resident Bag and Annual Limits				Harvest Est.	Sport %	Troll%	Sport %	Troll%	Harvest Est.
	Jan 1 - June 30	July 1 - July 31	Aug 1 - Dec 31							
TBD	Tier 1 (i)	TBD	TBD	TBD	TBD	TBD	TBD			
1	Tier 2 (h)	1/3	1/2	1/1	24,750	24.1%	75.9%	20.3%	79.7%	20,880
1	Tier 3 (g)	1/3	1/2	1/1	31,530	24.4%	75.6%	20.9%	79.1%	26,965
2	Tier 4 (f)	1/3	1/2	1/1	39,810	21.0%	79.0%			
2	Tier 5 (e)	1/3	1/2	1/1	45,530	18.5%	81.5%			
3	Tier 6 (d)	1/3	1/2	1/1	47,645	15.4%	84.6%			
3	Tier 7 (c)	1/3	1/2	1/1	52,875	15.3%	84.7%			

(Calculated as if there were inside wildstock closures, and residents allowed 2-fish bag limit upon reopening.)

(Calculated as if no SEAK wildstock closures occurring.)

Notes: Harvest estimates include PSC Risk Factor
No harvest history for Tier 1 (i) or Tier 7 (c)



Tier	Years (n)	Specific Years	Res bag	NR bag/annual limit	Observed Minimum	Average or Observed	Observed Maximum
h	1	2018	1	1/3, 1/2, 1/1	-	24,750	-
h	1	2018 (as with inside closures)	1	1/3, 1/2, 1/1	-	20,880	-
g	3	2008, 2009, 2019	1	1/3, 1/2, 1/1	26,855	31,530	36,140
g	3	2008, 2009, 2019 (as with inside closures)	1	1/3, 1/2, 1/1	23,180	26,965	29,475
f	4	2007, 2010, 2012, 2017	2	1/3, 1/2, 1/1	31,495	39,810	49,430
e	4	2006, 2011, 2013, 2016	2	1/3, 1/3, 1/3	41,055	49,370	61,675
e	4	2006, 2011, 2013, 2016	2	1/3, 1/2, 1/2	39,385	47,090	58,510
e	4	2006, 2011, 2013, 2016	2	1/3, 1/2, 1/1	38,480	45,530	55,975
d	2	2014, 2015	3	1/3, 1/3, 1/3	52,290	53,015	53,725
d	2	2014, 2015	3	1/3, 1/2, 1/2	47,160	49,050	50,935
d	2	2014, 2015	3	1/3, 1/2, 1/1	45,395	47,645	49,885
c	0	NA (none, within the years evaluated: 2006 – 2019)	NA	NA	NA	NA	NA

Submitted By
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Submitted On
12/17/2021 11:48:56 AM
Affiliation



PC050
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I am writing in support of herring proposals #156, #157, and #158 to help undo the significant effects of a collapsed herring population in Southeast Alaska. Herring are a keystone species fish for salmon and marine mammals as well as having great cultural value. As a former resident of Kake, I understand how important herring and herring eggs are to the people there. I ask you to take this critical first step toward helping herring populations in Southeast, particularly in Sitka Sound, to recover.