

Submitted By  
Kenneth Edward Quigley  
Submitted On  
12/22/2021 3:19:58 PM  
Affiliation  
processor



PC201  
1 of 1

This comment is in regards to proposal 105 which will allow drift gillnetters in the PSN THA area.

The main reason SSRAA produces king salmon is to help offset the deficit trollers face every year trying to catch their allotment of hatchery fish.

In 2021 gillnetters caught about 30% more hatchery kings than the trollers. By allowing the driftnet boats into PSN the trollers will face an even larger loss in their allotment of hatchery fish.

There are several private and commercial docks in PSN. Due to the heavy sport and charter traffic in and out of the bay during May and June it will be impossible to avoid conflict if gillnetters are allowed to set gear.

Gillnetting has never been allowed on the west side of Prince of Wales!

Last year the cost recovery and the Troll catch of these fish was right in line with what SSRAA was predicting. The 2022 King return is predicted to be smaller than 2021.

With this being such a small fishery adding another user group is not necessary at this time. When the larger releases are predicted to return, implementing a Gillnet fishery may be necessary to harvest effectively but this is 4-5 years out minimum.

Submitted By  
kent dobbins  
Submitted On  
12/8/2021 8:30:41 AM  
Affiliation



PC202  
1 of 3

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Email  
[kentcheetah@gmail.com](mailto:kentcheetah@gmail.com)  
Address  
po box 874  
haines, Alaska 99827

I think it's time to talk about a hatchery in the upper chilkat river system as a way to restore our declining numbers of king salmon



December 22, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> 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 Haines, Alaska, and I participate in the subsistence and public use salmon fisheries of the Southeast region. I'm a long-time resident, and we need to look at the viability of a hatchery in the Upper Chilkat River; I think it's time to revisit the idea. It would help with the kings decline in our river system and provide food, jobs and revenue to our local fisherman. Years ago, I worked at the Burro Creek Hatchery in Skagway. It was valuable to the Upper Lynn Canal for kings, chums and pinks. Salmon fishing is very important for our survival here in Haines. With food prices high, the salmon provide most of the meat we eat through the year.

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,

Kent Dobbins  
kentcheetah@gmail.com  
(907) 766-2138



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

RE: King salmon management proposal 82 and 83

Chair Carlson Van Dort and members of the Board

My name is Kent Huff and I and my wife (Diane) own Glacier Bay Eagles Nest Lodge in Gustavus, Alaska. We have been in the lodging and sport fishing business for twenty-two years. We employ or provide employment opportunities for 12 people. We also buy most of our operating supplies from the local businesses in town. Our season runs from the first week in June to the Middle of September. Available fish in June and the first part of July are very limited. King salmon are one of only a few fish that can be marketed to the out-of-state sportspeople in the month of June. We start taking bookings up to a year in advance. Reducing the king limits would drastically hurt the ability to stay in business in such a short window of operation.

I do not Support Proposal 82. I don't know how many of my booked guest will choose not to come and cancel for the upcoming season, but I do know there will be several of them. The reduction of out-of-state sportspeople will also hurt the local businesses and the taxes collected by the City of Gustavus.

I support proposal 83. This would help us with workable regulations and allow us to book trips a year in advance helping the local businesses and the tax base in Gustavus.

I hope the Board will see fit to make the harvesting of king salmon equable to all the parties using this resource.



Kent Huff  
Glacier Bay Eagles Nest lodge  
47 Wilson Road  
Gustavus, Alaska 99826

Submitted By  
Keshia Lawrence  
Submitted On  
12/20/2021 7:02:49 AM  
Affiliation



PC204  
1 of 1

I am writing in support of articles 156, 157, and 158, which promote and instill sustainable practices herring protection. It is important in the mists of climate chaos, that indigenous species and communities are thoroughly protected with environmental policies. These decisions are critical for the overall ecosystems, and subsistence living cultures in the North.



## *Office of the President*

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Comment for Proposal #168 regarding the sac roe fishery in the Southern Inner Channels near Ketchikan

In regards to proposal #168 which deals with quotas and guideline harvest of the southern inner channels sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for this fishery to become more sustainable for this area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



The Ketchikan Indian Community Tribal Government would like to address some of the aspects of this proposal as it relates to the Ketchikan area.

The southern inner channels fishery is not and has not been at historical levels for years. Whether this is a result from overexploitation or changing environmental conditions is irrelevant. This subpopulation of herring needs to have further protections so it has a chance to come back to these historical levels our tribal citizens once experienced long ago. It is shown the sac roe fisheries are harmful at almost any exploitation rates. While there hasn't been an opening in this area in some time, we should do away with the sac roe fishery altogether in this area. The abundance levels need to go back to historical levels before we even consider trying to reopen anything, not when we just start to see an uptick in abundance.

Additionally, as stated in the reasoning for this proposal, the herring support Ketchikan's most popular finfish fishery, king salmon. While the herring roe fishery here has not been exploited in some time, both of these stocks are at serious risk of bottlenecking. This is something that the Alaska Board of Fisheries needs to seriously consider when making a determination on this fishery.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

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The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge.

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Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



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### Comment for Proposal #81 Allocation of King salmon to trollers

In regards to proposal #81, that pertains to king salmon allocation to a specific user group after September 1<sup>st</sup>, the Ketchikan Indian Community Tribal Government does not feel that this is in the best interest of the population of king salmon for all user groups, especially to the Indigenous people of southeast Alaska. Therefore the Ketchikan Indian Community Tribal Government opposes proposal #81.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely



on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

While specific allocation between all user groups is another concern entirely, the user group that have the highest potential to harvest king salmon in the wild are the commercial fleet, which in turn have the highest probability to over harvest this vital resource to all Alaskans alike. For the Ketchikan area specifically, one major system that supports king salmon that also has major cultural significance to the Indigenous people of the area is that of the Joonax (Unuk) River. This system once flourished with bountiful numbers of King salmon that sustained the Indigenous people of the land. However, current regulations prevent anyone, including Indigenous subsistence harvesters, from intentionally capturing this salmon that have been so important to us for generations before us. We at the Ketchikan Indian Community understand the importance of protecting natural resources when their populations are critically endangered, such as the Joonax River king salmon. The Ketchikan Indian Community feels that this proposal threatens the potential for any sort of rebound of abundance of salmon in this system, and would like to go on the record that this tribal government opposes proposal #81.

This proposal is not to meant to be a direct attack at anyone or any user group. ~~Indigenous people all over Alaska engage in commercial activities such power trolling (which this specific proposal pertains to), seining, gillnetting, etc. These activities provide economic support for these people and their families.~~ However, with this proposal, we do not feel the benefits outweighs the costs for any user groups, whether that be in the short or long term.

Another point that the Ketchikan Indian Community would like to address is ~~that if there is any sort of under harvest by any user group throughout the~~



fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike. However, the Ketchikan Indian Community Tribal Government understands that many systems for king salmon are not reaching sufficient escapement that is so crucial for the long term sustainability. Therefore, especially now, if there is any opportunity to increase wild populations of king salmon in Alaska, we feel that it is best to just allow those "under harvested" fish to swim by and reproduce. We do not feel that these fish should always be fished to the maximum harvest levels just to make a couple extra dollars. It hasn't been working to keep population levels sustainable.

The one aspect of this proposal that the Ketchikan Indian Community Tribal Government agrees with is that we all must come together and prepare for the 2029 king salmon treaty negotiations. This can and will impact every single user group that utilizes these resources. The Ketchikan Indian Community can and would support working together on those negotiations so that we may better serve all Alaskans, especially Tribal Citizens.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game



species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in black ink that reads "Gloria Burns".

Gloria Burns



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Comment for Proposal #165 in regards to Pacific herring allocation in Sitka Sound

In regards to proposal #165 which deals with quotas and guideline harvest of the Sitka herring fishery, the Ketchikan Indian Community would like to show its opposition as we do not see this benefiting the short or long term sustainability of the herring population in Sitka Sound.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



The Ketchikan Indian Community Tribal Government would like to address some of the claims that are made in proposal 165. From our understanding in this proposal, this would allow the Sitka sac roe commercial fishers to harvest Pacific herring in the Sitka sound area. This is something that is concerning to us.

The Alaska Board of Fisheries and the Alaska Department of Fish and Game has the obligation to assure the citizens of Alaska that they are managing our fisheries, which would include Pacific herring, for its long term sustainability. Classifying these fish as “unharvested” sets a bad precedent and does not help accomplish the goal of sustainability. If there is any “unharvested” fish in the Sitka Sound area, those fish need to be protected for future recruitment. As it is, the fishery is not in great shape like it has been historically. Therefore, if there is any opportunity to do so, the Alaska Department of fish and Game and the Board of Fisheries should let those fish go.

Another issue that the Ketchikan Indian Community Tribal Government takes issue with this is that this proposal is essentially trying to do is create a new fishery that the sac roe fishers can utilize without buying into it without a permit, which ultimately results in more competitive exclusion from new people potentially wanting to get into the business. The permits are that are currently issued are for sac roe harvesting only. We cannot be adding on new methods of harvesting just because the sac roe fishing is inefficient at harvesting their quota, aside from their quota being higher than it should be in the first place. This is not a viable option for a number of reasons.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.



The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a “keystone species.” This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw’aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



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Comment for Proposal #84 regarding King Salmon allocation to non-resident sport fishers

In regards to proposal #84 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional



resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

We would like to address the directives in this proposal:

For directive #1, directing the ADFG to manage for non-closure of residents, falls right in line with the constitution of Alaska. The state has the obligation to protect these resources for the utilization by residents before nonresidents.

For directive #2, reporting catch records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

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For directive #3, these implementations seem reasonable to protect a species that are struggling to reach escapement in many of our watersheds in southeast Alaska. Intermittent closures during the week seem to have a positive impact on the management of halibut, we fell that a version of this can be very useful impact on king salmon as well.

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This proposal is not to meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with king salmon allocation, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns



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Comment for proposal #163 regarding equal share harvesting for the Sitka Sac Roe Herring fishery

In regards to proposal #163 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its opposition as we do not see this supporting the goal of long term sustainability of Pacific herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to address our concerns as it relates to this proposal. The biggest thing that stands out to us in



regards to this proposal is that it this type of fishery allows for fishers to be selective of what fish they harvest and what type of fish they release back into the water. This is something that is very concerning to the Ketchikan Indian Community. As with any fish, there is an associated mortality rate that comes catch and release activities. Herring are a relatively delicate fish and there is a higher mortality when they are caught using seine nets. We do not believe that this is beneficial to the population during the long term. No fish should ever be wasted if we are attempting to harvest it. The only thing that would make this proposal worth considering is if they would be required to harvest everything that comes into their nets. No exceptions. Additionally, the implementation of vessel observers would make our tribal government more willing to consider this proposal.

As this proposal addresses the need for keeping people and property safe, which the Ketchikan Indian Community Tribal Government also values, there needs to be another solution that meets this requirement. We feel something more can be done to keep people safe while keeping the long term sustainability of this resource together.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. ~~Let this be an invitation to the State of Alaska that the Ketchikan Indian~~ Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns





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Comment for Proposal #87 regarding King Salmon allocation to nonresident fishers in the southeastern Alaska-Yakutat area

In regards to proposal #87 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan



Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

This proposal simply states that the state of Alaska has the obligation to protect the rights of residents of Alaska, especially the Indigenous people of Alaska. The people who live here should be never be at risk this year. The Alaska Department of Fish and Game did recognize that in the summer season of 2021 the harvest of nonresident sport fishers was higher than anticipated. Regardless of the timing of it, the Department should always use this as a tactic to assure that residents always have access to these resources.

One aspect of this proposal that is of interest to the Ketchikan Indian Community Tribal Government is the concept of a fish box tax on nonresident sport fishers. We would like for this issue to be addressed in length at the Board of Fish meeting. We feel that this could be useful in a number of different aspects.

1. This could very much help with addressing some budget woes that go on with science and research that the Alaska Department of Fish and Game may have. This would also put less burden on resident Alaskans to support these kinds of research.
2. People who come to harvest in our waters from out of the state are not going to worry about a small tax that will be imposed on them for harvesting their own fish. Again, these people are not coming here to survive off of this resource, they are here for the experience, which cost for most people are an after thought. This means there shouldn't be economic loss to those who have charter fishing businesses.



While it is addressed in a number of proposals in this meeting cycle, the Ketchikan Indian Community Tribal Government would like to provide suggestions to help out with the management of nonresident sport fishers:

1. Reporting catch AND harvest records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

2. Intermittent closures during the week seem to have a positive impact on the management of halibut, we fell that a version of this can be very useful impact on king salmon as well.

This proposal is not to meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people



use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns

Cc:

ADFG



Bo Meredith  
2030 Sea Level Dr. #205  
Ketchikan, AK 99901  
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Don Young- US House Representative  
2314 Rayburn House Office Building  
Washington, DC 20515

Lisa Murkowski- US Senator  
522 Hart Senate Office Building  
Washington, DC 20510

Dan Sullivan  
302 Hart Senate Office Building  
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State Capitol Building Room 513  
Juneau, AK 99801

Representative.Dan.Ortiz@akleg.org



## **Office of the President**

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Comment for Proposal #161 regarding subsistence fishing permits for herring roe

The Ketchikan Indian Community is in strong opposition of proposal #161 regarding subsistence fishing permits for harvesting herring roe on branches in the Sitka Sound Area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The proposal written by the Southeast Herring Conservation Alliance, a group of organized commercial sac roe herring fishers, is a direct attack on the rights of Indigenous people of southeast Alaska. This misinformed group does not understand customary and traditional use by rural Alaska natives and wishes to



enforce an unnecessary regulation on the Tribal Citizens of Sitka. In the proposal written by the Southeast Herring Conservation Alliance, they directly site the litigation between the Sitka Tribe of Alaska and the State of Alaska. It is not the fault of the tribal citizens that the population of the herring in Sitka is of low abundance, but it seems that the Southeast Herring Conservation Alliance thinks that way.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.

The Ketchikan Indian Community also values accurate and unbiased scientific data that could help guide the best actions necessary to achieve the goal of sustainable fisheries in Alaska. The Sitka Tribe of Alaska has significant in-house resources when it comes to ocean research in southeast Alaska. The Ketchikan Indian Community would find it more desirable that the Sitka Tribe of Alaska work alongside its tribal citizens to acquire accurate data for the use of management purposes of herring in that area. Instead of directly attacking user groups, especially those who rely on these resources to sustain their healthy dietary needs, we should be working together to reach our common goal of sustainability. The Ketchikan Indian Community would like to extend its support the Sitka Tribe of Alaska if they would like to work on a program to obtain useful data that is respectful to the tribal community.

The Southeast Herring Conservation Alliance does not need to try to impose their uninformed will on the subsistence sector of this fishery. This group does not need to make rules and regulations for people who they do not represent. It is likely that these individuals do not understand the cultural significance that is the herring. Like many coastal tribes around Alaska, the herring are held in high regard as a traditional resource of the sea. You see herring in our song, dance, artwork, and stories. It is obvious that this fish is much more than just food or a paycheck. The herring bring life to our environment and tribal



communities. By adding another barrier, such as the proposed permit in proposal 161, to the harvest of this resource, you are attempting to take away a part of the culture of people who have existed for generations.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species. The overseeing management agency has a critical job and obligation to protect Pacific herring, supporting this proposal does nothing to accomplish that goal.

The Ketchikan Indian Community Tribal Government would like to extend its hand, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are applicable to the management of most fish and game species in our region. We would welcome, encourage, and expect consultation when tribally significant resources have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through the immense value of traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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Haw'aa  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns

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## *Office of the President*

**2960 Tongass Avenue — Ketchikan, AK 99901**  
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Comment for Proposal #110 reporting of gear loss

In regards to proposal #110, dealing with reporting of gear loss, the Ketchikan Indian Community Tribal Government is in full support of implementation into regulation.

The Ketchikan Indian Community Tribal Government would like to go on the record that we are committed to finding solutions to keep all species, both commercial and non-commercial, sustainable for all to enjoy for generations to come.

“Ghost fishing” as it is called, can have significant negative impacts to localized fish populations sustainability, especially with net gear types. As stated in the proposal itself, the loss of gear in our waters have negative impacts to finfish and marine mammal species alike and should be reported to the proper authorities so that a “clean-up” can be done, if possible. There are many



examples around the world where ghost fishing is common and is causing major harm.

The Ketchikan Indian Community Tribal Government feels that this rule should be applied to all commercial fishing activities, as well as any fishing activities that involve long net or longline gear types. We firmly believe that this would be a good step in the right direction to keep our fisheries sustainable. While it will not fix all of southeast Alaska fisheries woes, it will have significant impacts on local fisheries if it is conducted in a manner that is useful.

As long as it is deemed that there was no foul play or intentional neglect on fishing operations, we do not feel that there should be any penalty for gear that is lost. Gear loses integrity over time and is often hard to tell if a line is going to snap. This proposal should be encouraging of those who lose gear to come forward so that it can be addressed so there is limited damage to the ecosystem. However it goes without saying that if there is foul play, negligence, or failure to report loss of gear, there should be some sort of penalty associated with it. This penalty would change with the severity of the circumstances of the gear loss.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with gear loss, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through



traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



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Comment for Proposal #159 regarding changes in sac roe vs subsistence harvesting times.

In regards to proposal #159 which deals with the harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its opposition to the implementation as it not supportive of subsistence fishing activities in the Sitka Sound area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



The Ketchikan Indian Community Tribal Government would like to address some of the claims that the Southeast Herring Conservation Alliance make in proposal 159 as some seem misleading. There are some comments that are made that claim this alliance can designate areas that are culturally significant to harvest for the Tribal Citizens for the Sitka Tribe of Alaska. At best these remarks highly uninformed, at worst these remarks are intentionally trying to destroy a part of traditional culture in Sitka through competitive exclusion all for the pursuit of profit. These remarks are seen as an attack on Indigenous culture throughout southeast Alaska and the Ketchikan Indian Community will not stand for it. This is something that must be looked at by the state of Alaska and the Alaska Board of Fisheries.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

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The Southeast Herring Conservation Alliance does not need to step foot in the subsistence sector of this fishery. This group does not need to make rules and regulations for people who they do not represent. It is likely that these individuals do not understand the cultural significance that is the herring. Like many coastal tribes around Alaska, the herring are held in high regard as a traditional resource of the sea. You see herring in our song, dance, artwork, and stories. It is obvious that this fish is much more than just food or a paycheck. The herring bring life to our environment and tribal communities

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The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



## *Office of the President*

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Comment for Proposal #144 regarding logbook reporting for nonresidents

In regards to proposal #144 dealing with logbook reporting for nonresident sport fishers in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

The Sitka Fish and Game Advisory Committee does a very good job elaborating on how this can be easily implemented within the sport sector of our fisheries in southeast Alaska. Now more than ever we need these logbooks for critically important species including but not limited to king salmon, rockfish, and halibut. While the committee suggests halibut to be used for this logbook requirement, the Ketchikan Indian Community Tribal Government recommends doing for all harvestable species of finfish, shellfish, and beach seafood. This model can be very beneficial to the management of all species in our region.

The State of Alaska has the golden opportunity to make great strides for the management for sustainability of the biological resources in southeast Alaska. Out of all of the user groups for finfish, shellfish, beach foods, and game, nonresidents have the greatest capacity and capability to report harvest for the purposes of in-season management. People come from all over the world to



partake in fishing and hunting in the State of Alaska. These people spend thousands of dollars to enjoy the resources that we have. If these people are financially and physically able to come to Alaska to do these recreation activities, they are more than capable of writing down and reporting crucial data that would assist the State of Alaska to prioritize the sustainability of our resources.

We are aware that there is a number of programs to estimate the number of fish being harvested in our communities, with the primary one being creel surveying at ports. The Ketchikan Indian Community Tribal Government recognizes the benefits that come from these programs, but they do not cover the entirety of the nonresident sport fishing sector, which again has the capability to do these reporting activities.

The Ketchikan Indian Community Tribal Government would also like to go a step further and differentiate and require CATCH and HARVEST records from nonresident sport fishers.

Catch defined as: all organisms that were brought to the surface, whether or not they were landed or not, but not harvested.

Harvest defined as: all organisms that were kept resulting death, regardless of the use of the organism.

Data that would be useful to gather could include: species, date caught, time caught, estimated depth, and location, among others as the managers see fit.

There is a substantial difference between catch and harvest. Harvest is very simple as you can easily tell how many fish were killed in the process of fishing. Catch is a bit more complicated but it is just as important to paint a better picture on what is happening with our resources. We sure that the Alaska Department of Fish and Game is aware that there is an associated mortality rate with catch and release fishing. Species like king salmon and rockfish have especially high mortality after released by anglers. The Ketchikan Indian Community Tribal Government finds it appropriate and essential for this type



of data to be collected to ensure the sustainability of our finfish in southeast Alaska.

The Ketchikan Indian Community Tribal Government wants to make clear in this comment that this is not meant to be an "attack" on the nonresident sport fishers in that come to Alaska. We recognize that these people bring in a flux of money to our local economies every year. However, we all must recognize that these are Alaskans resources especially that of the Indigenous people of the land. Like many Alaskans, we utilize this resource as a way of putting food on the table. Whether that reason be due to financial and/or culture reasons, it always seems that locals are having to bear the burden of the work. Nonresidents are financially and physically able to put in the minimal effort to help provide these resources for generations to come for all user groups.

However, this can only be successful if this is going to be enforced. Failure to report should result in some sort of fine and/or revoking of future licenses. People will not report unless they are incentivized. We believe this is something that the state of Alaska has the authority to do and should be done.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with nonresident reporting of harvest (and catch), which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,



*Gloria Burns*

Gloria Burns



## *Office of the President*

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Comment for Proposal #158 regarding age structure composition for the Sitka  
Sac Roe herring fishery

In regards to proposal #158 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for fishers of all user groups more sustainably harvest herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Sitka Tribe of Alaska provides a number of valid considerations that would make this proposal worth putting into place with our management system



through the Alaska Department of Fish and Game. As with many of our species here in the State of Alaska, the older and larger individual species within their population make big contributions towards recruitment back into the ecosystem. This is huge. This is where the “BOFFFF theory” comes into play. Bigger, older, fatter females will result in more fecund fish. These larger females also result in roe that has higher success rates of recruitment compared to fish of smaller sizes because more energy is being put into each egg. There is more that we can go into, but we feel that the research, and the review, done by the Sitka Tribe of Alaska is sufficient.

This proposal ensures that there is not as a dramatic drop off in population age structure of the Pacific herring in the Sitka Sound area, and to be quite frank a model similar to this should also be implemented in every fishery in the state of Alaska. Dynamic age structure is important for population success, and the Alaska Board of Fisheries and the Alaska Department of Fish and Game need to seriously consider looking into this type of management practices for the long term sustainability of this resource.

Additionally, the Sitka Tribe of Alaska put in a lot research that ultimately was laid out into their proposal. There are a number of academic journal articles come from respected scientists and accredited institutions that supports the claims that the Sitka Tribe of Alaska is making. These management practices can work, but we need to be willing to make the jump to these practices. The status quo, for this fishery especially, is no longer an option. We need to find better ways to make sure that we keep this fishery sustainable. Otherwise no one will be able to benefit from it any longer. This includes both subsistence users and commercial fishers alike.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.



As stated by the Sitka tribe of Alaska, no one wants this valuable fishery to come to a moratorium. The Ketchikan Indian Community Tribal Government feels very strongly about this as many of tribal citizens rely on commercial fisheries for a source of income. We've seen moratoriums in the past that have displaced a number of people from their livelihoods. The Atlantic cod fishery collapsed in 1992, and resulted the displacement of 1000's of people in eastern Canada. Southeast Alaska's fisheries are a bit more diverse than that of Canada's, but we don't see any good from an economic standpoint of getting to that point. However, that being said, the sustainability of the Pacific herring will always come before profits. Again, this proposal is designed in such a manner that we avoid any long term moratoriums.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,



*Gloria Burns*

Gloria Burns



## *Office of the President*

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Comment for Proposal #157 regarding commercial harvest of herring in Sitka Sound.

In regards to proposal #157 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for fishers of all user groups more sustainably harvest herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Sitka Tribe of Alaska provides a number of valid considerations that would make this proposal worth putting into place with our management system



through the Alaska Department of Fish and Game. As with many of our species here in the State of Alaska, the older and larger individual species within their population make big contributions towards recruitment back into the ecosystem. This is huge. This is where the “BOFFFF theory” comes into play. Bigger, older, fatter females will result in more fecund fish. These larger females also result in roe that has higher success rates of recruitment compared to fish of smaller sizes because more energy is being put into each egg. There is more that we can go into, but we feel that the research, and the review, done by the Sitka Tribe of Alaska is sufficient.

This proposal ensures that there is not as a dramatic drop off in population age structure of the Pacific herring in the Sitka Sound area, and to be quite frank a model similar to this should also be implemented in every fishery in the state of Alaska. Dynamic age structure is important for population success, and the Alaska Board of Fisheries and the Alaska Department of Fish and Game need to seriously consider looking into this type of management practices for the long term sustainability of this resource.

Additionally, the Sitka Tribe of Alaska put in a lot research that ultimately was laid out into their proposal. There are a number of academic journal articles come from respected scientists and accredited institutions that supports the claims that the Sitka Tribe of Alaska is making. These management practices can work, but we need to be willing to make the jump to these practices. The status quo, for this fishery especially, is no longer an option. We need to find better ways to make sure that we keep this fishery sustainable. Otherwise no one will be able to benefit from it any longer. This includes both subsistence users and commercial fishers alike.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.



As stated by the Sitka tribe of Alaska, no one wants this valuable fishery to come to a moratorium. The Ketchikan Indian Community Tribal Government feels very strongly about this as many of tribal citizens rely on commercial fisheries for a source of income. We've seen moratoriums in the past that have displaced a number of people from their livelihoods. The Atlantic cod fishery collapsed in 1992, and resulted the displacement of 1000's of people in eastern Canada. Southeast Alaska's fisheries are a bit more diverse than that of Canada's, but we don't see any good from an economic standpoint of getting to that point. However, that being said, the sustainability of the Pacific herring will always come before profits. Again, this proposal is designed in such a manner that we avoid any long term moratoriums.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns





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Comment for Proposal #156 regarding quotas and guideline harvest for Sitka Sac roe commercial fisheries.

In regards to proposal #156 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for fishers of all user groups more sustainably harvest herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



The Ketchikan Indian Community Tribal Government believes that this proposal is a no brainer in terms of implementation. The state of Alaska already uses the management practices that the Sitka Tribe of Alaska is trying to implement in Sitka Sound. While we understand that sometimes different subpopulations of organisms need different types of management practices, this is not one of those cases for southeast Alaska's herring fisheries. It is apparent that harvesting at higher rates within the Sitka Sound fishery is not achieving the goal of sustainability.

Additionally, the Sitka Tribe of Alaska put in a lot research that ultimately was laid out into their proposal. There are a number of academic journal articles come from respected scientists and accredited institutions that supports the claims that the Sitka Tribe of Alaska is making. These management practices can work, but we need to be willing to make the jump to these practices. The status quo, for this fishery especially, is no longer an option. We need to find better ways to make sure that we keep this fishery sustainable. Otherwise no one will be able to benefit from it any longer. This includes both subsistence users and commercial fishers alike.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.

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As stated by the Sitka tribe of Alaska, no one wants this valuable fishery to come to a moratorium. The Ketchikan Indian Community Tribal Government feels very strongly about this as many of tribal citizens rely on commercial fisheries for a source of income. We've seen moratoriums in the past that have displaced a number of people from their livelihoods. The Atlantic cod fishery collapsed in 1992, and resulted the displacement of 1000's of people in eastern Canada. Southeast Alaska's fisheries are a bit more diverse than that of Canada's, but we don't see any good from an economic standpoint of getting to that point. However, that being said, the sustainability of the Pacific herring will always



come before profits. Again, this proposal is designed in such a manner that we avoid any long term moratoriums.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



## *Office of the President*

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Comment for Proposal #160 regarding the reduction of closed area for the Sitka  
Sac Roe fishery

The Ketchikan Indian Community is in strong opposition of proposal #160 regarding subsistence fishing permits for harvesting herring roe on branches in the Sitka Sound Area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The proposal written by the Southeast Herring Conservation Alliance, a group of organized commercial sac roe herring fishers, is a direct attack on the rights



of Indigenous people of southeast Alaska. This misinformed group does not understand customary and traditional use by rural Alaska natives and wishes to enforce an unnecessary regulation on the Tribal Citizens of Sheetka (Sitka). In the proposal written by the Southeast Herring Conservation Alliance, they directly site the litigation between the Sitka Tribe of Alaska and the State of Alaska. It is not the fault of the tribal citizens that the population of the herring in Sitka is of low abundance, but it seems that the Southeast Herring Conservation Alliance thinks that way.

Additionally, one thing that we would like to address about the reasoning of this proposal is that the authors claim that the allocation of herring roe was "artificially inflated." No, this number better meets the needs of the subsistence users that rely on this resource throughout the year. The Southeast Alaska Herring Conservation Alliance has no business dictating how much food tribal citizens put in their freezers. We do not tell these commercial fishers how much beef or chicken they put in their freezers and feel that same respect should be reciprocated.

We would like to address the specifics of this proposal as there seems to be some misconceptions on the traditional harvest of herring eggs in the Sitka area. First and foremost. The state of Alaska has the obligation of providing sufficient access to subsistence users of natural resources before any other user group. Sufficient access meaning that they can harvest enough to support themselves and their families, and they are given opportunities to harvest in a safe manner. The quantity of harvest is straightforward. However, it seems that there is some confusion about what is classified as safe harvesting opportunities. Contrary to the belief of some, the majority of subsistence users are not monetarily wealthy. There are thousands of families in southeast Alaska that ~~could easily fall under the poverty line. What does this have to do with safety?~~ Well everyone does not have access to large \$50,000-\$1,000,000 vessels that can take multiple harvesters to far off places to harvest these traditional foods. The Sitka Sound area can have extremely bad weather during herring egg season. No one should be expected to travel miles away from port in small skiffs to harvest something they have an inherent right to do so anywhere so long as it is done responsibly.



The Ketchikan Indian Community Tribal Government feels the need to remind the state managers and the commercial sac roe fleet that the one of the major goals of the management of our fisheries in Alaska is to make sure that there is lowest probability for loss of life of anybody. Any closure to near town areas goes against this ideal of keeping people safe. Again, subsistence users in Alaska are usually harvesting off of smaller vessels that do not take bad weather well.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



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Comment for Proposal #143 regarding in-season reporting of nonresident sport fish harvest.

The Ketchikan Indian Community Tribal Government is in strong support of proposal #143 regarding in-season reporting of nonresident sport fish harvest in southeast Alaska.

The State of Alaska has the golden opportunity to make great strides for the management for sustainability of the biological resources in southeast Alaska. Out of all of the user groups for finfish, shellfish, beach foods, and game, nonresidents have the greatest capacity and capability to report harvest for the purposes of in-season management. People come from all over the world to partake in fishing and hunting in the State of Alaska. These people spend thousands of dollars to enjoy the resources that we have. If these people are financially and physically able to come to Alaska to do these recreation activities, they are more than capable of writing down and reporting crucial data that would assist the State of Alaska to prioritize the sustainability of our resources.

We are aware that there is a number of programs to estimate the number of fish being harvested in our communities, with the primary one being creel surveying at ports. The Ketchikan Indian Community Tribal Government recognizes the benefits that come from these programs, but they do not cover the entirety of the nonresident sport fishing sector, which again has the capability to do these reporting activities.



As stated in the reasoning for this regulatory change, only species with an associated annual limit are reported to the Alaska Department of Fish and Game, which would include important species like king salmon. However we, the Ketchikan Indian Community Tribal Government, find it imperative that the reporting expand to all species regardless of annual limit status. The Indigenous of people utilize all of the resources within our lands and seas. In the 21<sup>st</sup> century, data is essential for the successful management of all of our resources. Although most species in Alaska do not have annual limits for nonresident sport fishers, we should use this as an opportunity to collect this data.

The Ketchikan Indian Community Tribal Government would also like to go a step further and differentiate and require CATCH and HARVEST records from nonresident sport fishers.

Catch defined as: all organisms that were brought to the surface, whether or not they were landed or not, but not harvested.

Harvest defined as: all organisms that were kept resulting death, regardless of the use of the organism.

Data that would be useful to gather could include: species, date caught, time caught, estimated depth, and location, among others as the managers see fit.

There is a substantial difference between catch and harvest. Harvest is very simple as you can easily tell how many fish were killed in the process of fishing. Catch is a bit more complicated but it is just as important to paint a better picture on what is happening with our resources. We sure that the Alaska Department of Fish and Game is aware that there is an associated mortality rate with catch and release fishing. Species like king salmon and rockfish have especially high mortality after released by anglers. The Ketchikan Indian Community Tribal Government finds it appropriate and essential for this type of data to be collected to ensure the sustainability of our finfish in southeast Alaska.



The Ketchikan Indian Community Tribal Government wants to make clear in this comment that this is not meant to be an “attack” on the nonresident sport fishers in that come to Alaska. We recognize that these people bring in a flux of money to our local economies every year. However, we all must recognize that these are Alaskans resources especially that of the Indigenous people of the land. Like many Alaskans, we utilize this resource as a way of putting food on the table. Whether that reason be due to financial and/or culture reasons, it always seems that locals are having to bear the burden of the work. Nonresidents are financially and physically able to put in the minimal effort to help provide these resources for generations to come for all user groups.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with nonresident reporting of harvest (and catch), which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



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Comment for Proposal #162 regarding increase in harvest limits for subsistence users.

In regards to proposal #162 which deals with quotas and guideline harvest of the herring roe on kelp, the Ketchikan Indian Community would like to show its full support as we see this as a way for subsistence fishers of southeast Alaska to have better access to traditional foods that sustains them throughout the year.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



This proposal is something that the Ketchikan Indian Community Tribal Government can get behind. Our government will always encourage opportunities for tribal citizens to harvest traditional foods in their area so long as it is done responsibly. The traditional resource that our tribal citizens always get excited for is herring roe on kelp/branches. However, we feel the current limits are far too low for a family to sustain themselves throughout the year.

We feel that this proposal increases the amount that is still sustainable no matter what region this resource is being harvested from. In reality, the subsistence fisheries throughout the state of Alaska are negligible for management purposes for the sustainability. Therefore the Ketchikan Indian Community strongly encourages the Alaska Board of Fisheries to consider this proposal and its implementation.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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Gloria Burns



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Comment for Proposal #116 regarding King Salmon retention during nonretention periods

In regards to proposal #116 dealing with retention of king salmon during periods of non-retention, the Ketchikan Indian Community Tribal Government opposes this proposal as we do not see this benefitting any user group in the short or long term.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.



The Ketchikan Indian Community Tribal Government would like to address the major concerns as it pertains to proposal #116. While we see positive intent with this proposal, this proposal can turn into a major slippery slope that can end up doing more harm than good. It is well known that there is an associated mortality rate with catch and release fishing for any species of finfish, and king salmon is no exception to this rule. However, the benefits here do not outweigh the potential detriments that this proposal creates.

As a tribal entity, we pride ourselves in making sure that harvesting practices are as efficient with as little waste as possible. This is something that we as government and the author of this proposal can agree on. While there is good intent with this proposal, we can see people abusing this new rule. This abuse could potentially be in the form of taking in additional profit, taking in fish resources for the benefit of consumption of the commercial fisher, and potentially not being reported and sold "under the table." The Ketchikan Indian Community Tribal Government does not want to assume the worst in people, but the reality is that this is very possible that can happen.

Additionally, the king salmon stocks in many of our watersheds are well below escapement goals throughout southeast Alaska. We have to give every opportunity for this fish to return back to their natal streams so that they contribute to future recruitment back into the population. This proposal does NOT accomplish this goal.

To reiterate, the priority here is to not allow this proposal to be accepted by the Alaska Board of Fisheries.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with retention of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the



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Comment for proposal #164 regarding equal share harvesting for the Sitka Sac Roe Herring fishery

In regards to proposal #164 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its opposition as we do not see this supporting the goal of long term sustainability of Pacific herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to address our concerns as it relates to this proposal. The biggest thing that stands out to us in



regards to this proposal is that it this type of fishery allows for fishers to be selective of what fish they harvest and what type of fish they release back into the water. This is something that is very concerning to the Ketchikan Indian Community. As with any fish, there is an associated mortality rate that comes catch and release activities. Herring are a relatively delicate fish and there is a higher mortality when they are caught using seine nets. We do not believe that this is beneficial to the population during the long term. No fish should ever be wasted if we are attempting to harvest it. The only thing that would make this proposal worth considering is if they would be required to harvest everything that comes into their nets. No exceptions. Additionally, the implementation of vessel observers would make our tribal government more willing to consider this proposal.

The authors of this proposal also claim that there would be very little need for enforcement and in season management for this type of fishery but the Ketchikan Indian Community Tribal Government cannot see how this would be the case. With fishing activities spread over a long period of time, this is ultimately going to cost the state of Alaska thousands if in millions of dollars to oversee this fishery if it were to be extended. The southeast Alaska Sitka Sac Roe herring fishery is one of the most contentious fisheries in the state right now. To even remotely suggest that less resources should be funneled into the management of this fishery is not only absurd, but raises some questions on the validity of the authors intent with this proposal.

As this proposal addresses the need for keeping people and property safe, which the Ketchikan Indian Community Tribal Government also values, there needs to be another solution that meets this requirement. We feel something more can be done to keep people safe while keeping the long term sustainability of this resource together.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the



management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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Respectfully,

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Gloria Burns



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Comment for Proposal #92 regarding King Salmon retention in terminal harvest areas

In regards so proposal #92, dealing with king salmon retention in terminal harvest areas, the Ketchikan Indian Community would like to address some concerns we have with the implementation and express our opposition for this proposal as it does not follow our goal of protecting natural resources for all.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan



Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

We understand the intent behind this proposal is good. As the Indigenous people of this land we pride ourselves on not being wasteful of the resources that are harvested in both land and sea. However we also believe this can lead down a slippery slope of regulations that can harm king salmon in all regions of Alaska, not just terminal harvest areas near salmon hatcheries and release sites.

King salmon in our area are currently being harvested by every user group, which means that there is a lot of exploitation pressure on this species on top of natural mortality and predation pressures. We understand the frustration that the author of this proposal is feeling when he sees another gear type being able to harvest undersized fish, however out of any gear group throughout all commercial fishers, the trollers have the highest probability to king salmon alive after being caught. Any other gear group that harvests salmon have close to 100% mortality rates. While it is an issue undersized salmon are being harvested all over the state, this has to deal with current technology and lack of localized exclusion of smaller fish. For the purposes of this comment, we don't believe that the just because one person can do it, doesn't mean everyone (although anyone would be more appropriate) should do it. To sum up this response, we believe that this can turn into a slippery slope for over harvesting in all areas of Alaska. First it will start in terminal harvest areas, but that leaves the door open for fish poaching and harvesting undersized fish outside of terminal harvest areas.

To address undersized fish in this proposal, the author claims that many fish could be just returning as jacks and therefore should be harvested anyways. While there is some truth to that, salmon are known to be unpredictable with migration throughout its lifecycle. Can we really know for certain that these



fish are coming back to die? Are these fish just milling around close to their natal stream for extended periods of time? We are not confident there is enough research done in a lot of our areas to determine if what is common. The bottom line is that we do not want to risk any young fish that have the potential to grow to maturity and reproduce in our waters, regardless if they are natural or wild stock. Everyone is aware that king salmon in Alaska are struggling, we all need to act like it and do what we must to protect them for their long term sustainability.

We do agree with the author of this proposal that net fishers being allowed to sell non-target finfish species while other gear types can is unacceptable, but we do not think this is the correct approach. There has to be another solution to this.

This proposal is not meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else.

Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.



The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with retention of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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Respectfully,

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Gloria Burns



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Comment for Proposal #169 regarding the sac roe fishery in Behm Canal

In regards to proposal #169 which deals with quotas and guideline harvest of the Behm Canal sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for this fishery to become more sustainable for this area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to address some of the aspects of this proposal as it relates to the Ketchikan area.



The Behm Canal herring fishery is not and has not been at been at historical levels for years. Whether this is a result from overexploitation or changing environmental conditions is irrelevant. This subpopulation of herring needs to have further protections so it has a chance to come back to these historical levels our tribal citizens once experienced long ago. It is shown the sac roe fisheries are harmful at almost any exploitation rates. While there hasn't been an opening in this area in some time, we should do away with the sac roe fishery altogether in this area. The abundance levels need to go back to historical levels before we even consider trying to reopen anything, not when we just start to see an uptick in abundance.

The Behm canal fishery is also at risk of losing another forage fish in this area, the Eulachon or ooligan. There is a small run of Eulachon that return to the Joonax (Unuk) river that also is nowhere near historical levels of abundance. Any commercial fishery that involves nets in this area during the months of February through April has the opportunity to harvest Eulachon as bycatch. This is unacceptable in the eyes of the Ketchikan Indian Community Tribal Government. The Alaska Department of Fish and Game and the Alaska Board of Fisheries has the obligation to protect this culturally significant traditional resource at all costs. The Tribal Citizens of the Ketchikan Indian Community should have opportunities in the future to harvest these resources and the implementation of this proposal gives them better chance of doing so down the road.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally



significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

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Gloria Burns



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Comment for Proposal #86 regarding King Salmon allocation to nonresident fishers in the southeastern Alaska-Yakutat area

In regards to proposal #86 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan



Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

This proposal simply states that the state of Alaska has the obligation to protect the rights of residents of Alaska, especially the Indigenous people of Alaska. The people who live here should be never be at risk this year. The Alaska Department of Fish and Game did recognize that in the summer season of 2021 the harvest of nonresident sport fishers was higher than anticipated. Regardless of the timing of it, the Department should always use this as a tactic to assure that residents always have access to these resources.

While it is addressed in a number of proposals in this meeting cycle, the Ketchikan Indian Community Tribal Government would like to provide suggestions to help out with the management of nonresident sport fishers:

1. Reporting catch AND harvest records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

2. Intermittent closures during the week seem to have a positive impact on the management of halibut, we fell that a version of this can be very useful impact on king salmon as well.



This proposal is not meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns



### Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901  
(907) 228-4900 Phone  
[www.kictribe.org](http://www.kictribe.org)

Comment for Proposal #85 regarding King Salmon allocation to nonresident  
fishers in the southeastern Alaska-Yakutat area

Ketchikan Indian Community

<http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2021-2022/proposals/85.pdf>

KIC's Position:			
<input checked="" type="checkbox"/> SUPPORT;	<input type="checkbox"/> OPPOSE:	<input type="checkbox"/> ADDITIONAL RECOMNDATIONS	
Specie(s) Impacted:			
<input checked="" type="checkbox"/> (King) Salmon	<input type="checkbox"/> Eulachon	<input type="checkbox"/> Herring	<input type="checkbox"/> Shellfish
Activity(s) Addressed:			
<input checked="" type="checkbox"/> Subsistence Fishing	<input type="checkbox"/> Commercial Fishing	<input checked="" type="checkbox"/> Sport Fishing	
<input checked="" type="checkbox"/> Charter Fishing	<input checked="" type="checkbox"/> Non-Resident Fishing	<input type="checkbox"/> Gathering Seaweed	
<input type="checkbox"/> Gear Regulations			
Community(s) Affected:			
<input type="checkbox"/> Ketchikan	<input type="checkbox"/> POW	<input checked="" type="checkbox"/> SEA Region Wide	<input type="checkbox"/> Tribal



In regards to proposal #85 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

This proposal simply states that the state of Alaska has the obligation to protect the rights of residents of Alaska, especially the Indigenous people of Alaska. The people who live here should be never be at risk this year. The Alaska Department of Fish and Game did recognize that in the summer season of 2021 ~~the harvest of nonresident sport fishers was higher than anticipated.~~ Regardless of the timing of it, the Department should always use this as a tactic to assure that residents always have access to these resources.

While it is addressed in a number of proposals in this meeting cycle, the Ketchikan Indian Community Tribal Government would like to provide suggestions to help out with the management of nonresident sport fishers:



1. Reporting catch AND harvest records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

2. Intermittent closures during the week seem to have a positive impact on the management of halibut, we fell that a version of this can be very useful impact on king salmon as well.

This proposal is not to meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their



lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

Gloria Burns



## *Office of the President*

**2960 Tongass Avenue — Ketchikan, AK 99901**  
**(907) 228-4900 Phone**  
[www.kictribe.org](http://www.kictribe.org)

Comment for Proposal #210 regarding closure of waters for commercial Dungeness crab fisheries near Hydaburg, Alaska.

In regards to proposal #210 dealing with Dungeness crab in the Hydaburg area, the Ketchikan Indian Community Tribal Government supports the proposal as it a good way to give priority to the subsistence users of southeast Alaska.

Dungeness crab (*C. magister*), also known as k'ust'aan in Haida, s'aaw in Tlingit, and k'almoos in Tsimshian have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds crab in high regard as a culturally significant resource. Many people rely on crab as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

The Ketchikan Indian Community Tribal Government would like to show its support for the implementation of proposal #210 as this is something that is important to the tribal community of Hydaburg.



The residents of Hydaburg live in a very remote area that does not have reasonable access to large grocery stores to sustain them throughout the year, which is why those residents heavily rely on the traditional resources that can be found around them in that area. The Alaska Department of Fish and Game and the Alaska Board of Fisheries has the obligation to prioritize subsistence and personal use harvesting of any species before any other user group. The community of Hydaburg is well within their rights to make this request as they are seeing real declines in crab populations throughout the area. Whether the declines are the result of climate change, overexploitation, or sea otters are irrelevant. This is being seen through the scope of traditional ecological knowledge. This is an area that the Alaska Department of Fish and Game and the Alaska Board of Fisheries really needs to get into as this information can pair well with the ideologies of western science to come to more holistic approaches to fisheries management in the state of Alaska. The information coming from the subsistence and personal users of the area is useful and needs to be taken into consideration when it comes to these decisions.

The Ketchikan Indian Community Tribal Government requests that the Alaska Board of Fisheries seriously considers the implementation of this proposal as it will have profound benefits for the residents of the community of Hydaburg, Alaska and not give into profits that may be made in the short term for a small group of people.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with crab in the Hydaburg area, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns



## *Office of the President*

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[www.kictribe.org](http://www.kictribe.org)

Comment for Proposal #232 regarding the creation of a commercial spiny dogfish fishery

In regards to proposal #232 dealing with the creation of a new spiny dogfish fishery in southeast Alaska, the Ketchikan Indian Community Tribal Government supports this proposal as it is a good way to reduce waste and provide more opportunities within the commercial fishery for the citizens of Alaska.

Spiny Dogfish (*S. acanthias*), also known as k'aad in Haida, x'atgu in Tlingit, and ggashggaads in Tsimshian have profound impacts within our deep water ecosystems and food webs. They provide for the environment all along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to express its support for this proposal while addressing some of the factors that are being made by the author of this proposal.

The author claims that the spiny dogfish fishery in southeast Alaska is underutilized. As a tribal government, we agree on the basis that many spiny dogfish are being tossed overboard as a result of their incidental catch through longline and pot fisheries. We find this to be unacceptable as our values as Indigenous people guide us to not waste any resource that we come



across, not matter what it is. Therefore, it is imperative that this harvest be utilized in some sort of manner. As the author claims in their proposal, there are many uses for spiny dogfish all over the world. One major use that the author does not go over is its uses in the classroom. Spiny dogfish are used in basic biology and ichthyology classrooms all around the world, especially here in Alaska for the uses of dissection. These dissections are critical for the early education of fisheries biologists, marine biologists, and oceanographers alike. The state of Alaska can easily contribute to this knowledge to young learners and help engage future managers for our state.

One thing that we would like to address however is that we have to really understanding the spiny dogfishes functional biology, life history, and behavior before we can start a full on commercial fishery for them. Many of the organisms that fall under the class of Chondrichthyes (cartilaginous fishes that include sharks, skates, rays, and chimeras) have life history traits that make them easily susceptible to overexploitation by humans. The Alaska Department of Fish and Game and the Alaska Board of Fisheries must be very careful if this fishery were to be created outside of allowable bycatch for other fisheries. Our recommendation would be to test out some management practices through a pilot fishery that would allow the Alaska Department of Fish and Game to better understand this species without southeast Alaskan waters.

In summary, the Ketchikan Indian Community Tribal Government is in support of this proposal if it is done responsibly such that this species is sustainable throughout time. Again, we want to reduce the amount of waste within our existing fisheries.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with spiny dogfish, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian



Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns



### *Office of the President*

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**(907) 228-4900 Phone**  
[www.kictribe.org](http://www.kictribe.org)

Comment for Proposal #177 regarding closed waters for shrimp in the Hydaburg area.

In regards to proposal #177 dealing with shrimp fisheries near the Tribal Community of Hydaburg, Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as it a good way to give priority to the subsistence users of southeast Alaska.

Shrimp (*Caridae*), also known as dag in Haida, and s'eex'at in Tlingit, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds shrimp in high regard as a culturally significant resource. Many people rely on shrimp as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

The Ketchikan Indian Community Tribal Government would like to show its support for the implementation of proposal #177 as this is something that is important to the tribal community of Hydaburg.



The residents of Hydaburg live in a very remote area that does not have reasonable access to large grocery stores to sustain them throughout the year, which is why those residents heavily rely on the traditional resources that can be found around them in that area. The Alaska Department of Fish and Game and the Alaska Board of Fisheries has the obligation to prioritize subsistence and personal use harvesting of any species before any other user group. The community of Hydaburg is well within their rights to make this request as they are seeing real declines in shrimp populations throughout the area. This is being seen through the scope of traditional ecological knowledge. This is an area that the Alaska Department of Fish and Game and the Alaska Board of Fisheries really needs to get into as this information can pair well with the ideologies of western science to come to more holistic approaches to fisheries management in the state of Alaska. The information coming from the subsistence and personal users of the area is useful and needs to be taken into consideration when it comes to these decisions.

The Ketchikan Indian Community Tribal Government requests that the Alaska Board of Fisheries seriously considers the implementation of this proposal as it will have profound benefits for the residents of the community of Hydaburg, Alaska and not give into profits that may be made in the short term for a small group of people.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals shrimp in the Hydaburg area, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,  
Respectfully,

*Gloria Burns*

Gloria Burns



## *Office of the President*

**2960 Tongass Avenue — Ketchikan, AK 99901**  
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Comment for Proposal #83 Allocation of King salmon in the southeastern Alaska-Yakutat area

In regards to proposal #83 dealing with king salmon allocation, the Ketchikan Indian Community Tribal Government would like to show its opposition to its implementation.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.



The management agency and overseeing policy drivers (ADFG and AK Board of Fish) have an obligation to protect a species that is currently in low abundance all across the state of Alaska. While it is important for all user groups to have access to these resources, we must assure that allocation of fish are appropriated in respectable fashion. While we understand that nonresident sport fishers come to Alaska to harvest, which in turn supports our economy, they do not rely on this resource to live. This is a luxury to this user group. However the subsistence, personal use, and commercial fishers use this to sustain life for them and their families. During these trying times the ADFG needs to prioritize the people of Alaska before anyone else.

One issue that we especially take issue is that this proposal does not leave room for written closure of the nonresident sport fish harvest of king salmon. One could potentially say that this could come from item (i) in this proposals suggested regulation, but we believe that this needs to be written into the books such that the Alaska Department of Fish and Game has the obligation to shut fisheries down if there is any data suggestion that there is over harvest of allocation or lack of escapement in any king salmon river.

Additionally, it appears that this proposal is prioritizing the harvest of king salmon by nonresidents over residents. We feel that this is unacceptable.

The coronavirus pandemic is an (unfortunate) great example of why we need to protect these resources for the people who live here. In many of our communities store shelves were bare for weeks at a time due strains on the supply chain. Unfortunately we can't easily pop over to the next store or community to search for stocked places because there are/were none to be had. The Ketchikan Indian Community believes that if there is any sort of potential for the stock to crash further, due to overharvest, nonresident sport fishers should be the first group to be restricted, not the other user groups. There



might come a point where other user groups will have to restrict their harvest as well, but we don't want to get this backwards. There are other sport species that nonresidents can harvest and still get the Alaskan fishing experience. Residents, and Indigenous residents, should not their culture before people from down south come harvest what is not theirs.

This proposal is not to meant to be a direct attack at anyone or any user group. However, with this proposal, we do not feel the benefits outweighs the costs for any user groups, whether that be in the short or long term.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike. However, the Ketchikan Indian Community Tribal Government understands that many systems for king salmon are not reaching sufficient escapement that is so crucial for the long term sustainability.

These statements are not said without the consideration of how this will impact those who provide opportunities for nonresidents through charters. While we sympathize with potential economic losses for those people, we must remember that we have to protect the rights of resident Alaskans first.



The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with King Salmon allocation in the southeastern Alaska-Yakutat area, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,  
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns

Submitted By  
Kevan O'Hanlon  
Submitted On  
12/22/2021 9:34:07 PM  
Affiliation



PC206  
1 of 1

I am writing because I believe it is important to prioritize subsistence harvest, listen to and value traditional knowledge, and to manage the commercial herring fishery in such a way that ensures a resilient population for the future.

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

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

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



Submitted By  
Capt. Kevin Burchfield  
Submitted On  
12/14/2021 10:17:22 AM  
Affiliation  
Lost in Alaska Adventures, LLC

Phone  
9073211405  
Email  
[lostinalaska@gci.net](mailto:lostinalaska@gci.net)  
Address  
1016 Edwin Place  
Juneau , Alaska 99801

I am Capt. Kevin Burchfield, owner and operator of Lost in Alaska Adventures LLC, a fishing guide service based in Juneau and I would like to make the following comments on selected BOF proposals:

84- Oppose...requires daily reporting as opposed to weekly as is currently required which places undue burden on the guided angler fishery...also appears to shift all of the conservation effort to the guided angler fishery...we believe all stakeholders must share the burden of conservation in times of low production. Singling out one subsection of the user groups for conservation is simply wrong and unjust!

85-Oppose... appears to shift all of the conservation effort to the guided angler fishery...we believe all stakeholders must share the burden of conservation in times of low production. Singling out one subsection of the user groups for conservation is simply wrong and unjust!

86-Oppose... appears to shift all of the conservation effort to the guided angler fishery...we believe all stakeholders must share the burden of conservation in times of low production. Singling out one subsection of the user groups for conservation is simply wrong and unjust!

146-Oppose...we do not believe there is any scientific need for Coho, Chum, Pink, or Sockeye to be restricted at this time.

155-Oppose...this would not allow the use of multiple hook systems for ground fish such as halibut...it's simply too far reaching in scope... some situations require removal of the fish from the water to properly remove any gear that could be detrimental to the health of the fish to be released...encouraging proper release technics we do endorse.



Submitted By  
Capt. Kevin Burchfield  
Submitted On  
12/20/2021 9:31:06 AM  
Affiliation  
Juneau Charter Boat Operators Association

Phone  
9073211405  
Email  
[lostinalaska@gci.net](mailto:lostinalaska@gci.net)  
Address  
1016 Edwin Place  
Juneau, Alaska 99801

Marit Carlson Van Dort, Chairman

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

Re: King salmon management proposals 82 and 83

I am Capt. Kevin Burchfield, president of the Juneau Charter Boat Operators Association, we represent 12 fishing and whale watching operators in the Juneau area. I also own and operate Lost in Alaska Adventures...a fishing guide service in Juneau.

King salmon are critical to our operation all season, and especially early. Kings are one of just a few fish that really attract anglers to come to Alaska.

*Talk a little about the problems caused by inseason regulation changes, closures, or annual limits that are too restrictive to attract and keep fisherman traveling to Southeast Alaska.*

We do not support Proposal 82. We are 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 inseason, so they never know what regulations to expect. Attracting fisherman that support local jobs, tax bases, and economies will take some suitable and stable limits at all abundance levels.

We support Proposal 83 that keeps workable regulations in low abundance and avoids inseason 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. 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 harsh from what sport fisherman have been allowed for a while. It seems important to have enough fish to keep residents open to get fish for the freezer and also to keep enough opportunity for non-residents to catch kings to keep them visiting Southeast Alaska every year. Proposal 83 does a better job for both resident and non-resident fisherman.

I hope the Board can find a fair tradeoff between all groups that take kings to keep both resident and non-resident sport fishing open all season with workable regulations during low runs. It will benefit Alaskans by helping put up food and keep people coming into our state at levels that have been a big boost to our households and the surrounding economy.

Sincerely,  
Capt. Kevin Burchfield



Submitted By  
Kimberly Ramos  
Submitted On  
12/22/2021 5:07:56 PM  
Affiliation

Phone  
8312619728  
Email  
[Karamos17@gmail.com](mailto:Karamos17@gmail.com)  
Address  
18240 Point Stephens rd  
Juneau, Alaska 99801

Southeast Alaska is my home and I want Alaska's fisheries to be around for generations to come. 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  
kirk Agnitsch  
Submitted On  
12/22/2021 3:05:57 PM  
Affiliation

Phone  
9078263909  
Email  
[surestrikecharters@aptalaska.net](mailto:surestrikecharters@aptalaska.net)  
Address  
P.O. Box 987  
Craig, Alaska 99921

To the members or the board:

i have 35 years invested in the alaska charter fishery. My wife , myself and 3 children are full time residents, we run 6 full time boats out of our lodge, may-sept. half of our employs are made up of local people, the majority of what we take in goes back into the local economy.

Proposal 83. I fully support this proposal. In recent years we have had king salman limits all up and down through the season. 2 a day to 0 , this is not productive to running a buisness ,selling the unkown. last season was a prime example, it started off with one a day for non residents , 4 anually. 3 dailey for residents. By aug. 1, it was 0 for non residents , 1 a day for residents. That quota could have bean stretched out a lot more.

1 a day for non residents 3 anual is were id like to see it go back to. the front end of the seson is most important because of lack of silver salmon , and as recent years have shown this can go on as far as mid july, but king salmon remain important to clients throughout the season .

stabilaty is what we are all asking for , we dont need a ton of extra fish on a high abundance year and get hamerred with closers on a low abudance year, proposal 83 is the best option for us at the moment. there has to be a happy medium somewhere. Stabilitat please ! on this issue.

proposals 226 and 227 I fully support both. Once again i have bean fishing these waters for 35 years, i have a boat in the water year around, no other charter or sport boat covers more ground than me and my boats. the dsr fishing is as good now as it was 30 years ago. one fish a day for dsr was over managment 3 years ago, to take it to 0 is crazy. There is not a resorce problem on the west side of prince of wales island...

Now i cant speek for other areas , but if there truly is a concern i would hope the f&g would adress those areas of concern and not just close evrything down.if the state is concerned about yelloweye rockfish, (once again i see no problem from a sportfishing point of view) they could seperate yelloweye from the rest of the dsr.

i here concerns of the charter idustry growing larger. this is not posable.the feds stopped growth when they they put a cap on halibut partisapation. there are only so many permits out there ,if you want to get into the idustry you have to get an existing permit. its pretty simple math..

thank you for your time

kirk agnitsch/sure strike lodge

[surestrikecharters@aptalaska.net](mailto:surestrikecharters@aptalaska.net)

907-826-3909

Submitted By  
Klinton Chambers  
Submitted On  
12/22/2021 7:12:57 AM  
Affiliation



PC210  
1 of 1

My name is Klinton Chambers, owner/operator of Haybucker Charters LLC operating out of Sitka, Alaska for nearly two decades and I support Proposal 83. As a charter captain and commercial troller, Proposal 83 would provide consistency to the King Salmon fishing done from my boat by clients during the charter season and myself when commercial trolling. Having the opportunity to fish for king salmon is a dream for most of my clients and presents a major draw for them to visit Sitka. When they visit Sitka, not only do they spend time on my boat with me fishing for salmon, they also frequent local businesses including lodging, restaurants, and local shops. Past in season king closures have led to clients trying to book earlier and earlier charter trips in order to be guaranteed the opportunity to fish for king salmon. With clear and consistent king salmon allocation, I will be better able to attract and keep clients. Additionally, as a full time resident of Sitka, I also support keeping resident access open. Thank you for reading and considering my input.



Phone: 907-486-6555

Fax: 907-486-4105

www.kraa.org

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

December 21, 2021

RE: Southeast and Yakutat Finfish and Shellfish, January 4-15, 2022  
Opposition to Proposals 101 and 103

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

Kodiak Regional Aquaculture Association (KRAA) requests that the Alaska Board of Fisheries reject those proposals at the Southeast and Yakutat Finfish and Shellfish Board Meeting that intend to cripple the salmon enhancement programs in Southeast Alaska and, by implication, all of the State of Alaska.

Proposals 101 and 103 are functionally equivalent to the proposals (49-53) heard at the December Prince William Sound (PWS) Board meeting in Cordova. Once again, the same proposer forces all stakeholders in the regulatory process—Board members, ADF&G, Board support staff, fishery participants, hatchery operators as well as the general public—to spend significant time and resources responding to ideas that are repetitive and that have been previously rejected by the Board. As mentioned in December, the Board may be better off vetting all of these types of proposals, state-wide, at a single meeting in March of each year.

The language used and accusations levied by the author of proposal 101 imply “flip-flopping” and dereliction of duty by the Department, “strong arming” by the enhancement representatives on the Regional Planning Teams, and generally a mis-managed system for enhancement programs and production. I challenge these statements. The regulatory and review framework for permitting of salmon enhancement in the state of Alaska sets an incredibly high standard for approval. Furthermore, there ARE measures in place and often conditions placed on permits that require monitoring, assessment, and evaluation of the returns related to new production or release areas. If needed, the review process by the RPTs will require, through recommendation to the Commissioner, production and management changes to improve projects and modify past practices.

Proposal 103 targets the Southeastern Alaska Area Enhanced Salmon Allocation Plan. (SAAESAP) This plan encompasses the three primary aquaculture associations in Southeast Alaska and seeks to address harvest allocations of returning hatchery salmon amongst three different commercial salmon gear types. Any changes to the Plan, especially by the Board of Fisheries, would need to be vetted by the stakeholders and the Department to assess overall impacts and unintended consequences.



The vetting process for change to the SAAESAP occurs annually when the plan is reviewed by the Southeast Alaska Allocation Task Force for Enhanced Salmon. Recommendations of the task force, such as issues related to time in area and hatchery production are then forwarded to the Regional Planning Team for Southeast Alaska. This process is complex and detailed and has implications not just for commercial salmon permit holders but for all salmon user groups in Southeast. Proposal 103 would add research requirements, arbitrary limits, and unspecified reductions on hatchery production based on an as-yet-to-be-determined stray rate. KRAA believes that the existing structure should be used to address all of these concerns and evaluate whether or not they merit change.

In summary, the proposals 101 and 103 targeting hatcheries in Southeast are no more workable or coherent than those that targeted hatcheries in Prince William Sound. Please reject these proposals just as you rejected the parallel proposals Prince William Sound's hatchery program.

Finally, KRAA would encourage Board members to continue your discussions regarding new protocols for hatchery related proposals. We believe that hatchery proposals should be taken up at a single meeting of the Board, perhaps the state-wide meeting in March. Hatchery proposals could be reviewed annually, on an every-other year basis, or once every three years. The current system has allowed an abuse of process with repetitive proposals using up the Board's time and resources. When the Hatchery Committee meets in March, current scientific information regarding Alaska's hatchery program is presented and the Board is informed regarding scientific updates and programmatic developments. It would seem more efficient for the Board to review and consider hatchery related proposals at the same time.

Thank you for the opportunity to submit these comments.

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

Tina Fairbanks  
Executive Director

Submitted By  
Korry Harvey  
Submitted On  
11/22/2021 8:56:06 AM  
Affiliation



PC212  
1 of 1

I am a resident of Bellingham, WA, and former resident of Anchorage, AK. I am writing to express my full support for the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast. Specifically, I support proposals 156, 157, 158. The food chain being what it is, herring protection ripples through the seas to affect several other species, notably endangered salmon and orcas which are dependent on healthy herring stocks. This decision holds considerable consequences all the way to the Salish Sea. Thank you for working to protect these natural treasures.

Submitted By  
Kristine Fulton  
Submitted On  
12/21/2021 1:16:26 PM  
Affiliation



PC213  
1 of 1

Dear Alaska Department of Fish and Game,

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."

Gunalchéesh for adding your voice to this important issue!



Submitted By  
Kurt Whitehead  
Submitted On  
12/22/2021 4:31:11 PM  
Affiliation

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Chair Carlson Van Dort and Members of the Board,

Thank you for your service.

My wife and I are year round, full time, real Alaskan residents that operate a small charter fishing lodge in Klawock, AK and contribute heavily to the local economy.

I fully support proposal 83. The last few years the king salmon annual bag limit for guided non residents have fluctuated between 0 and 4 depending on the month/week.

This unstable management approach to our king salmon bag limits makes it very difficult for the charter industry to book clients and keep them when we don't know from one week/month to the next if the king season will be open and if we have bag limits. We are more than willing to give up the increased bag limits in high abundance years and/or June for stability. This is the main reason I support prop 83. The vast majority of the charter industry would be happy to have a 28", 1/day, 3 annual in June, 1/day, 2/annual in July and 1/day 1 annual in August.

The charter fishing industry needs stability! Emergency closures/openers are not stable. They work in commercial fishing but they do not work in charter fishing. When the bag limit is high it creates greed in our clients and is counter productive to stability. We don't want/need excessive fish in June and then have no fish in August.

In prop 81, it proposes to allow charters to catch the excess fish after Sept. 1. This doesn't work for the majority of us because most of us are done fishing by then. The charter fishing industry seeks stability.

In prop 226 and 227, I am in full support and helped write both of them because the only rockfish that ADFG has conservation concerns with is the Yelloweye rockfish.

On the W side of PoW, Kuiu and Baranof there are so many rockfish (both pelagic and non-pelagic) that if you get within 10' of the bottom anywhere out there you'll likely catch a Quillback rockfish and if you get anywhere near structure you'll catch 13 different species. I target these species on a daily basis because they are fun for clients, taste great and make great memories. I assure you there are plenty of every species, including yelloweye.

A good solution would be to place yelloweye in their own bag limit so they are not lumped in with the other prolific, non pelagic species. Many resident local users are also unhappy they cannot harvest the other non pelagic species. ADFG has zero conservation concerns with all the other great eating non pelagic fish.

I am opposed to having our clients leave with more than 100lbs of fish per angler for many reasons but there is no reason they shouldn't be able to catch and eat a Copper rockfish, Canary rockfish, Quillback rockfish, etc.

The vast majority of the charter fishing lodge owners are full time Alaska residents that all contribute mightily to our local economies, take fewer fish out of the resource than any other commercial gear group and bring more money into the economy than any other gear group per fish.

For example, one king salmon has a value of about \$1000 to a charter lodge owner and that same fish has a value of \$100/\$200 to a troller.

If charter clients catch all of their daily limit of king salmon from June 15-August 15, a one boat operation such as mine with four anglers/day that fish every day can catch 240 total kings.

Operations like mine that don't fish every day due to our turnaround days will catch even less.

The charter fishing sector has remained stable and or decreased in all of SE AK since 2011 due to the Charter Halibut Permitting allocation process.

From ADFG's numbers:

There were 879 registered (licensed) saltwater charter vessels on all of SE AK in 2005.

In 2019 there were 783.

In 2020 there were 561.

Of these registered saltwater charters, the number that were active were:

738 in 2005, 653 in 2019 and 423 in 2020.



There is a narrative that the charter industry is growing and out of control but that is totally false. The Charter Halibut Permitting process has taken care of our growth.

What does continue to grow substantially are the unguided non resident boats that are pressuring our resources, the local users and the charter industry.

Their growth is driven by the irregularity in the Halibut regs. Unguided non residents can retain 2 fish of any size and the guided non residents (charters) have an unstable and fluctuating bag limit of 1 fish per day. If all non resident anglers had the same bag limits we wouldn't see this continuing growth in the unguided anglers.

If this board/ADFG would require an identification sticker on unguided non resident angler's boats it would result in better enforcement, better information and more informed locals.

Enforcement and the locals could easily identify boats.

Charter boats already have the large Green Bay Packers charter decal and our industry has been stable and/or declining since 2005 and we are heavily regulated, almost to the point of going out of business. We are not the problem.

More and more charter operations are realizing how valuable our resources are and we are limiting our clients to 100lbs each and placing more emphasis on the quality/experience than the numbers caught and poundage at the airport scale.

Thank you,

Kurt Whitehead - Treasure Hunter Lodge

Submitted By  
Kylee Jones  
Submitted On  
12/20/2021 4:03:07 PM  
Affiliation



PC215  
1 of 1

I am a born and raised Alaskan. My family (myself and two children) and I depend greatly on the endless resources the forest and ocean provide. I believe it is important that I stand up for these resources to protect the future of my children, and the children of every Alaskan.

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  
La quen náay Medicine Crow  
Submitted On  
12/22/2021 10:43:48 PM  
Affiliation  
on my own behalf

To the State of Alaska Board of Fish: I write today in honor of my father, William "Bill" Cheney, who served for years until his retirement as a policy analyst for the Board of Fish, as well as a biologist for ADF&G, and as a State Magistrate. He shared with me many times that the most detrimental problems with state management plans for our fisheries was the assumption that a balance could be struck between commercial and subsistence harvest for fish stocks and the belief that western knowledge and science was better than Native knowledge and science. He shared with me many times over his informed scientific finding that subsistence must be the first priority, and all others uses after, because inherent in subsistence is thousands of years old management practices for abundance and that management practice when excuted clearly serves all Alaskans into the future. I write in SUPPORT OF PROPOSALS 156,157, and 158. These proposals lead to safer and better 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 merit, lack both western and Native scientific justification, disrespect subsistence users as well as Tlingit knowledge, and run the risk of further damaging and reducing an already jeopardized herring population. The Board of Fish in respectful government to government consultation, collaboration, and co-management with the Sitka Tribe of Alaska should work together to advance a plan to restore the abundance of the herring population in Sitka Sound for today and for future generations to come. Gunalchéesh, Háw'aa, Thank you, La quen náay Medicine Crow of Keex Kwaan (Kake).



Submitted By  
Lakota Harden  
Submitted On  
12/22/2021 10:15:48 AM  
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I am writing today because I believe the measures for protecting our waters, specifically the Herring has not been effective and it is crucial to make better decisions that focus on Herring replenishment and their longevity, and not profits for people. I 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. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, and run the risk of further damaging and reducing herring populations. S Also, the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance. I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. The comments in favor of limiting the harvest over years have seemed to go unheard!! Please listen to the testimony of thousands who care only about the Herring and not of those who care only on monetary profit. Herring is the source of the food chain and needs to be protected. A few seasons of limiting their harvest would make a big difference in allowing the Herring population to replenish, hence the salmon, whale and other wildlife to replenish. Thank you for for considering protecting the Herring!! Lakota Harden Sitka, Alaska 99835



Submitted By  
Lance Preston  
Submitted On  
12/18/2021 4:51:48 PM  
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Madam Chair Marit Carlson-Van Dort and members of the Alaska State Board of Fisheries,

Thank you for the opportunity to comment. My name is Lance Preston and I have been the owner and skipper of commercial salmon trollers in Southeast Alaska for exactly 20 years. I arrived in Sitka as a college student looking for summer work in 1993 and have participated in every July 1 king salmon troll opener since. After working on several commercial fishing boats learning the trade, I bought my own boat and permit in 2001. I have managed to make what I consider a prosperous living exclusively as a salmon troller, but it has taken a lot of discipline, and a lot of luck. In 2013 I was elected to the Board of Directors of Seafood Producer's Cooperative where I still serve its nearly 400 fisherman owner-members. I'm a resident of Sitka.

I am thankful to have participated all these years in a well-managed fishery. I have always been impressed by the sheer quantity of fisheries data being gathered from me in particular and my fleet in general. For countless years the Department of Fish and Game has known exactly how many king salmon I'm catching, where I'm catching them and even how many hours of effort on average it takes for me to catch them. The limited geographical areas I'm allowed to fish are patrolled by law enforcement. My kings are measured to an eighth of an inch. In international/interstate negotiations over the Pacific Salmon Treaty my fleet-mates and I have endured deep cuts in Chinook catches, time after time, in the name of conservation. Since 2018, in our efforts to rebuild Stocks of Concern in Southeast Alaska, we've had to sacrifice what was to me and many a major component of a troller's annual income, namely the productive weeks of March and April at the tail end of the directed winter troll fishery. That one hurt, but it's worthwhile to try and rebuild those stocks. It would hurt more to be a part of a mismanaged fishery.

Unfortunately, I'm legitimately concerned that the guided, and increasingly unguided, tourism fishing industry isn't being held to the same standards of conservation and accountability. Their catches never have been counted with anywhere near the degree of accuracy as (other) commercial catches, and the rapidly expanding bare boat sector isn't required to report their catches at all. A limited number of commercial troll permits were issued by the state for good reason, but the guided and bare boat tourism sport sector is expanding rapidly and unchecked. Too often this tourism-based fleet is fishing the very same corridors the commercial fleet has reluctantly abandoned to rebuild Stocks of Concern.

The Department is painstaking in the management of the commercial troll fishery, and admirably precise in its data gathering from this sector, down to the individual king salmon, but the impacts on the very same resource made for years and decades by the tourism fishing industry have not been accounted for carefully or scientifically. Commonsense reporting protocols and laws are lacking. There has been a failure to acknowledge the rise of another commercial fishery in our midst, and while it's miscategorized as "sport," the longer-standing commercial fisheries have borne the burdens of stringent management and conservation. Without a great deal more accountability for their harvests, i.e., accurate, enforced, catch reporting, I'm afraid the commercial tourism fishery is on a trajectory to put increasing competitive pressure not only on regional fish resources, not only on resident anglers and commercial trollers, but also on themselves. They should be given an opportunity to more meaningfully share stewardship of the resource and participate in scientific management at the level other commercial fisheries do. Until that time, and until the impacts of their fishery are better accounted for and understood, I will oppose proposals that can encourage their under-managed expansion.

Prop 83, opposed. The tourist industry fisheries are too under-managed and unaccountable.

Prop 88, opposed. The tourist industry fisheries are too under-managed and unaccountable.

Prop 225, opposed. This reallocates resources to an under-managed sector.

Prop 144, support. This proposal would help remedy the lack of accountability in an under-managed sector.

Prop 87, support. The actions suggested in this proposal, if pursued, would lead to better, more accountable management of king salmon.

Prop 101 and 103, opposed. These proposals add an unnecessary layer of management to the production of hatchery salmon which have historically been of enormous value to the troll fleet. ADFG's involvement with this production has been sufficient and admirable.

Finally, concerning ADFG's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. I support option 1, the status quo, for the troll fleet. The areas that would be restricted under options 2 and 3 would close most of the remaining openers that are

available for trollers to access Alaska hatchery produced king salmon in any significant numbers since the current po... was implemented in 2018. After losing winter king opportunity in late March and April, this fishery has been an increa... contribution to many trollers' annual income. There are no significant harvests of the SOCs in these fisheries.



Again, thank you for the opportunity to comment.

Submitted By  
Larisa Manewal  
Submitted On  
10/9/2021 5:15:58 PM  
Affiliation



PC219  
1 of 1

Dear Southeast Board of Fisheries-

The Sitka Sac Roe fishery in its current state is very worrisome. Looking beyond the temporary economic gains of the fishery, the community will feel the long-term negative economic impacts if overfished in many different ways.

As a keystone species, other fisheries, like trolling, rely on a healthy herring population. Having participated in the troll fishery, I recall regularly finding whole herring in coho guts.

Tourism also depends on a balanced ecosystem, whether people come to sport fish or witness Humpback whales and other marine mammals supported by a robust herring population.

Most fisheries in Southeast Alaska are well managed, having learned from the East Coast collapse of many species. The sac roe herring fishery is an exception as it is inherently wasteful, inefficient at exclusively capturing the targeted mature females, and inadvertently supports fish farming industries that Alaskans have outlawed.

Born and raised in Sitka and spending most of my life in the region, I appreciate herring's inherent cultural and community importance. It is hard to put a monetary value on that, as it is simply a vital part of living here. As a friend put it, "the herring fishery is taking food out of our mouths," as his Tlingit way of life and this once-abundant food source becomes challenged by scarcity. Other communities that have lost their herring stock are now relying on the annual return to Sitka Sound as well.

History indicates that miscalculation in the abundance of biomass has led to a significant regional decline. Historical photos from the Alaska State Archives show Gastineau Channel once covered in herring. Predators like Humpback whales are rebounding, but the somewhat recent disappearance in Juneau is attributed to seine herring fisheries into the 1980s. There is still no evidence of any significant rebound. Spatial constriction and herring loss are familiar across Southeast Alaska, making Sitka one of the last places with any sizable return.

Short of a five-year moratorium, which has successfully replenished other species, I urge the board to support herring proposals 156, 157, 158 and oppose proposals 159, 160, 161, 162, 163, 164, 165 to protect this remarkable species for future generations and the overall health of our ecosystem.

Thank you for your time,

Larisa Manewal



Submitted By  
Larry and Gail Taylor  
Submitted On  
12/14/2021 1:14:33 PM  
Affiliation  
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Dear Board of Fish,

Now more than ever, it is direr that we protect our Fish, lands, and way of life. Regardless of whether we are Native, we must recognize the importance of Herring to the ecosystem and the devastation to the world if we continue to allow the SAC Roe to destroy our resources for the sake of a dollar bill. You must do the right thing and end these technics that have no consideration or respect for our way of life and our world.

I support Proposals 156, 157, and 158, which lead to safer management of the commercial herring fisheries in Sitka Sound by developing better protecting population resilience. These represent thoughtful and actionable ways to make the current management paradigm less harmful.

I am 75 years old and have been in Alaska since 1967, and Gail has been here since she was two years old. I lived in Sitka for sixteen years, watched the sac row fishery, and saw the herring spawning on kelp in Sitka Sound. When it was thick with Herring, the Sound was very active with economic activity, spotter planes zooming all over the place watching for schools of Herring. Then I heard about the jiant Herring they used to have at Halibut Cove across from Homer, and how the three canneries there decimated that giant variety. Those Herring are not around any more. They dissapeared. I don't think we know how many herring it takes to sustain a population, but there must be a tipping point, below which it is not possible for them to survive.

I strongly oppose Proposals 159, 160, 161, 163, 164, and 165, which lack reasonable scientific justifications, disrespects subsistence users and modern and traditional Tlingit Knowledge, and run the risk of further damage and reduction to the herring populations, which would devastate life as we know it in and out of the water.

I believe it is time for The Board of Fish to work with the tribes throughout Alaska because none of these proposals, even those I support, go far enough to protect our resources, land and advance respectful stewardship of our water and land. Since time immemorial, the indigenous people have been stewards of their lands and deserve our respect.

Next, I would request you address the following with the same respect and attention; Ketchikan for years has been considered Urban, per lower 48 or board standards, leaving our Indigenous community members without Subsistence rights.

I fully support

93, 142,146, 147, 148, 170,234. With the following requests by the Tribal Governments.

King salmon is considered a precious resource to all tribal members throughout Alaska. However, these Fish are threatened year after year with low escapement in many of our rivers. Therefore, it is imperative to have in writing to prioritize tribal members to have access to this valuable resource by setting a cap on the annual harvest of king salmon by nonresident sports fishermen regardless of the status of the fishery.

The Board of Fish and the Alaska Department of Fish and Game can still set a limit lower than the established cap by emergency order, but the harvest shall not exceed the cap.

Ooligan Fish is a widely traditional food of the Native community, and this should be honored and protected. I strongly support regular and traditional harvesting of Ooligan by resident use. However, I do not endorse or support commercial harvesting of Ooligan, and The Board of Fish should remove all regulations supporting commercial fishing of Ooligan from the fishing regulations.

146 Nonresident harvesting of coho, sockeye, pink, and chum gives a general provision for seasons, bag, possession, annual, and size limits in the Southeast Alaska Area.

Establishing limits for nonresidents to 16 inches or longer, and 5 of each species per day and only 10 of each species in possession for visiting sports fishermen, is a great start. However, it does not go far enough to protect tribal citizens, and Alaska residents who depend on subsistence and personal use in this time of financial instability and a rise in living costs throughout the state. Additionally, with the decrease in seafood abundance due to Sac Roes' devastation to Herring, which in turn has devastated our Coho, Sockeye, Pink, and Chum Salmon, we need to protect Alaskans who are impacted the most.



The Indigenous people of the Ketchikan Indian Community have been using all beach resources throughout southeast Alaska since time immemorial. These include but are not limited to clams, cockles, seaweed, gumboots, sea asparagus, and sea cucumbers. In any indigenous household, you can find a number of these resources at any given time. These resources are part of the identity of traditional users. Therefore, we find it appropriate to have all such beach seafood to be classified as customary and traditional resources.

I also support 234 requiring season reporting by nonresidents as to their fish harvest and believe annual limit status of all species should be a priority. The keeping of these records has been severely miss managed and is a data deficient in past years. This data is important to the management of future population estimates of our waters fish and seafood abundance and distribution.

We have a responsibility to our community members to make sure that our resources are protected and solvent for generations to come.

Over the last 25-35 years the people of the Southeast, have fought to protect our land and water from the devastations seen in other parts of the world and the lower 48. It is time the board of fish stop ignoring what the Sac Roe fishery has done to other parts of the world.

Populations of Fish are critical to human food security regardless of where you live and in serious decline worldwide. In the last four decades, some fish have declined by close to 75%, which in turn impacts other marine mammals such as Whales, seals, otters, birds, reptiles, wolves, bears, eagles, basically all living things. I could go on because the bottom line here is that Herring is the Bees of the Sea, and like their sister the Bee they feed and pollinate our food sources all around us.

We can not become dependent on commercial Grocery stores, and processed foods.

Who are we kidding, we all live on subsistence, and without herring, there will be no food, except chemically designed garbage.

If you believe in the idea of freedom, the freedom to live off the land, eat healthily, and what God designed for us to eat, it is up to us to protect the BEES of the SEA, our Herring.

Submitted By  
Laura Baldwin  
Submitted On  
12/17/2021 6:29:21 AM  
Affiliation



PC221  
1 of 1

I strongly support the three proposals by the Sitka Tribe of Alaska - proposals 156, 157, 158. These proposals are designed to incorporate specific elements of traditional ecological knowledge into the management of the commercial herring fishery in Sitka Sound and will foster herring abundance, which will benefit everybody in the long run.

I strongly oppose proposals 159, 160, 161, 163, 164, 165, by sac roe seine permit holders and the herring seine lobby group the Southeast Herring Conservation Alliance. These proposals will lead to destructive high-grading and the renewed decimation of local stocks in the bays and inlets up and down the coast, and mark the industry's desire to expand the scope of their permits to fully capitalize on the emerging abundance of herring in Sitka and beyond.

I believe that none of these proposals go far enough to affirm the fact of massive depletion of herring in the last century by commercial overfishing. This pattern has been devastating for indigenous people and coastal communities up and down the coast. The people of Southeast Alaska have been very clear for the last century in asking for an end to wasteful and destructive herring seining practices. This time of market failure for the fishery offers an ideal opportunity to take serious steps to foster abundance of herring populations up and down the coast of Baranof Island. We want wild abundance and shared prosperity for all creatures who depend on herring - not a parasitic commercial fishery.

Submitted By  
Laurel Stark  
Submitted On  
12/21/2021 11:02:14 AM  
Affiliation



PC222  
1 of 1

Dear Board of Fish:

Thank you for the opportunity to submit comments.

Please support 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 appropriate scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. Please engage with traditional ecological knowledge in your decision-making processes.

Thank you.

Submitted By  
Lauren Marie Cusimano  
Submitted On  
12/22/2021 3:56:33 PM  
Affiliation



PC223  
1 of 1

I support of herring proposals 156, 157, and 158.

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

Submitted By  
Lawrence Demmert  
Submitted On  
12/22/2021 4:04:11 PM  
Affiliation



PC224  
1 of 1

Proposal 167: Designate Salisbury Sound as a Spawn on kelp fishery area. Salisbury Sound should be opened to Northern SE Spawn on kelp fishery as it is just over 11 miles from Hoonah Sound.

The last time there was a Sac Roe fishery in Salisbury Sound was the last time Hoonah Sound was open to spawn on kelp. The Sac Roe fishery hasn't used its full quota for years and rarely fishes Salisbury. This would be a great help to the Nse spawn on kelp fishery which has been closed and would ease the great hardship experienced by spawn on kelp fishers, which many are from the Sitka area and many are Natives.



Submitted By  
Leah Canfield  
Submitted On  
12/22/2021 4:43:01 PM  
Affiliation

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I am a resident of Ketchikan, originally from north Alaska in Wales, and love the sea, food, and all that Southeast Alaska has to offer.

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  
Leah Mason  
Submitted On  
11/16/2021 6:40:27 PM  
Affiliation

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I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast. Proposals 156, 157, 158 are compromises that are very reasonable responses to existing interests in profiting from this very important species.

I would go further to say that it seems reasonable for those purporting to manage this resource to invest time and effort in a repopulation initiative in the many former sites where herring have been 'managed' out of existence.

Please show some humility in the face of a stark history of failure to manage these stocks. Please recognize the long-term success of the Alaska native people in securing abundance for all.

Thanks and Gunalcheesh for considering my request.

Leah Mason

Submitted By  
Lee House  
Submitted On  
1/15/2021 8:42:15 AM  
Affiliation



PC227  
1 of 2

Drawing from past Board of Fisheries meetings, it is clear that it would be difficult if not impossible to have a typical in-person meeting while also adhering to state and federal Covid-19 safety recommendations. This creates an unacceptable margin of risk for our communities and specifically the host community of Ketchikan. With that, I am requesting that the Board of Fisheries Meeting scheduled in Ketchikan in April 2021 be postponed until it is clear that the meeting can be held safely.

If the Board of Fisheries meeting is moved to a virtual venue, it is critical that it be carefully crafted to be inclusive and accessible. Over the last year, there have been many examples of virtual testimony and hearings leaving important voices to be heard out of the process by way of technology barriers and connectivity issues. If the meetings move to virtual, I request that a clear and transparent effort be made to be as inclusive as possible with a focus on accessibility, fairness, and equity.

Thank you for your consideration.



Submitted By  
Lee House  
Submitted On  
12/22/2021 8:55:55 AM  
Affiliation

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Sitka, Alaska 99835

Dear Alaska Board of Fisheries,

I am writing today as a resident of Sitka and a herring roe-on-branch subsistence harvester. I support proposals 156, 157, and 158. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

**Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.** Given the history of herring management areas throughout southeast Alaska that are now closed, I believe we should be making safe, conservative, and sustainable decisions with the herring population of Sitka Sound.

I regularly hear the remark that *the herring population is doing great after the last couple of years without a fishery being held*, and that that is good enough reason to oppose proposals 156, 157, and 158 "because the numbers are great and we don't have a conservation issue." The part of this rationale that confuses and concerns me is that it seems like not having a fishery in the past years was beneficial to the herring populations, so shouldn't that be an indicator that we should be more conservative in our fishery decision making? Proposals 156, 157, and 158 are great ways to do that. They are responsive to the herring population and adjust accordingly to lower the Sitka Sound Guideline Harvest Level at times of low abundance (156) and avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population (157 & 158).

Proposal 159, 160, and 161 are disappointing to see, and are a direct and unapologetic affront to the way of life associated with harvesting herring roe on branches. ADF&G data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users. To me, **these proposals reek of systemic racism.**

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

Still, I believe that none of these proposals goes far enough to advance respectful stewardship and protect wild abundance for generations to come.

I believe that intact herring populations mean better fed salmon, whales, eagles, halibut, seals, and so many other things that are key drivers in the tourist economy of our community. More importantly, intact herring populations mean stable harvests of herring eggs, which is a critical food source to many in this region culturally, spiritually, and historically. Tlingit ecological knowledge indicates that the herring populations in Sitka Sound are in decline. Tribal Citizens have been vocal about this decline for over thirty years, specifically with concern towards the commercial Sitka Sac Roe Herring Fishery.

Thank you,  
Lee House



**From:** [Leonard Revet](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Hatchery rearing  
**Date:** Thursday, December 16, 2021 6:36:14 PM

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Hello: I have proposed this several times and have not received any reply. I'll try one more time: I have worked in the fish hatchery at the university of Washington in Seattle, which reared King among other Pacific Salmon and Stealhead. This was back in the 1950-1960 period. I worked at the hatchery at Kitoi Bay on Afognak Island one winter and several summers, both in the hatchery and marking smolts as they made their way to the sea. The Kitoi Bay project was to start a Red Salmon migration from Frazer Lake on Kodiak Island and was successful.

There is no question that hatchery reared Salmon ids have a higher rate of survival than natural reared do. The Kenai River is a sad situation for King Salmon and this has been true for a long enough period of time to make it clear that the population is on a decline and even with a very limited catch per person it continues it's decline. The populations of King Salmon seems to be on the decline where ever they occur, one's I am familiar with, the Kuskokwim and Yukon Rivers, as well as SE Alaska are also on decline. The Kaslioff River has been producing an excellent return with an impute of caught King Salmon of the Hatchery Reared Fish.

I have lived on the Kenai River twice, 1979-1982 and 2016-present and see a very large change in the population, a obvious decline in King Salmon and healthy populations of Red and Silvers. It seems only logical that hatchery reared Kings would have the best chance of increasing the King Salmon population. I will not take this any further if no reply is received, Leonard "Bud" Revet



This email has been checked for viruses by Avast antivirus software.

[www.avast.com](http://www.avast.com)

Submitted By  
Linda Danner  
Submitted On  
12/13/2021 7:45:20 PM  
Affiliation



PC229  
1 of 1

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No on p83.Sport and guided fishermen are... 1. Not limited in numbers. 2. Do not help support hatcheries. 3. Had representation at Pacific Salmon Treaty that make the rules. 4. Are increasing in numbers of vessels participating. 5. Their season is getting longer. 6. The resource is diminishing. 7. They are largely non residents. We don't need and should not allow any more pressure on this diminishing resource. Often the airport is stuffed with boxes stuffed with fish. Often this resource is wasted or resold to pay for the Alaskan sport fishing experience. Let's protect king salmon as the Pacific Salmon Treaty intended. Not redistribute them to some gear group that sees an opportunity to do so.



Submitted By  
Linda Lewis  
Submitted On  
12/22/2021 2:09:19 PM  
Affiliation  
Shelter Cove Lodge

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Address  
PO Box 5758  
Ketchikan, Alaska 99901

Hello,

I am Linda Lewis (Creighton), proprietor of Shelter Cove Lodge in Craig, Alaska, a family run lodge for 23 years. Our son, David Creighton, and his wife and three children run the lodge and are year round residents of Craig. Our lodge runs 8 boats, employs 5 full time employees and approximately 32 employees during our lodge season June through August. Many of our summer employees are college students who depend on summer lodge wages to help finance their next year of college.

We are proud of our business and its success, hosting between 500 and 600 guests each season. We are also proud of the contributions the lodge and its guests bring to the City of Craig, the State of Alaska, and local businesses. Our guests purchase round trip tickets on our local air carrier, purchase gifts/souvenirs to take home, and enjoy a beverage from our local supplier. In addition, they pay a 5% sales tax on their trip and purchases as well as a local bed tax. Our business distributes money all year to Craig's local stores for tackle, fuel, equipment and supplies. Our local boat shop owner expressed that the charter industry accounts for close to 50% of his gross annual revenue and without the charter fleet, it would no longer pencil out for him to operate in Craig. Please also keep in mind that our clients alone contributed over \$40K in fishing license and stamps in 2019.

### **Proposition 82**

We are strongly opposed to Proposition 82 as written. With a regulation set that allows for a 1 daily/1 annual limit of kings for a non-resident as of June 16, our business will not be able to book people in the time-slot from June 16 until early or mid-July when the silver run becomes available. A one or two king annual limit is not sufficient to sustain a lodge business that operates a 3 day package as do most of the lodges in SE Alaska. We will have two choices: delay our lodge opening to mid-July or open the lodge in early June only to close or curtail operations for most of a month in mid-season. Neither choice is economically viable for the lodge or its employees. We have 23 years of experience operating Shelter Cove Lodge, have seen the allowable catch for most species diminish considerably, and strongly believe the limits outlined in Proposition 82 will destroy our business and other like businesses in SE Alaska. Please consider that a person visiting Alaska to fish for 3 days after June 15th will only be able to retain 1 king, 3 small halibut, 15 black bass and possibly 3 slope rock fish until the silver run begins. Would you spend \$5000 per person total including travel to accomplish this?

### **Proposition 83**

We are in support of Proposition 83. We feel whole heartedly SEAGO has gone to the best effort to request an equitable solution for both gear groups. SEAGO has also examined and demonstrated historical data and ADFG&G assistance that Proposition 83 will pencil out to sustain the charter industry, impart very little impact on the troll fleet all while still accomplishing the necessary management of the species and compliance with the treaty. Proposition 83 also brings some consistency and predictability to our industry. Currently, we cannot guarantee our clients the product we are selling will even be available. It would be like an airline selling a non-refundable ticket with a 50/50 shot of the plane flying. If the charter industry in Alaska is forced to endure drastically reduced limits, cancellations will occur in large numbers and there will be no federal dollars to save butts this time. With short notice of regulation changes and large amounts of money spent well in advance to prepare for each season, not many operations will survive more than one season of minimal returns.

### **Proposals 84, 85, and 86**

Resident priority to us is unnecessary. So far in history we can only recollect kings being shut down to residents late in the season. By this time, residents have all had ample opportunity to catch their kings. By the time the closures occur, most have moved on to collecting silvers and bottom fish.

Submitted By  
Lindsay Johnson  
Submitted On  
12/22/2021 11:11:54 PM  
Affiliation  
FV Sika



PC231  
1 of 2

Madam Chair Märit Carlson-Van Dort and members of the Alaska State Board of Fisheries,

Happy New Year to you all. My name is Lindsay Johnson. I grew up on Southeast Alaska seafood and am now a power troller with my family as crew. I regret not being able to participate in the Board process in person as my second child is due during this meeting. We all have our work cut out for us this week!

My major concerns are 1) that Alaska residents do not lose access to fishery resources to nonresident anglers and that 2) those resources, most notably king salmon, are allocated fairly among user groups for maximum sustainable yield based on the most complete information possible.

Thank you for counting my opinions on the following proposals and for your efforts towards prosperous fisheries for Alaskans into perpetuity.

Proposal 80- Support

Proposal 82- Support

Proposal 83- Strongly oppose

Proposal 84- Support

Proposal 85- Support

Proposal 92- Support

Proposal 96- Support

Proposal 101- Oppose

Proposal 103- Oppose

Proposal 110- Support

Proposal 144- Strongly support

Proposal 156- Support



Proposal 157- Support

Proposal 158- Support

Proposals 159-165- Oppose

Proposal 217- Support

Proposal 219- Support

Proposal 224- Support

Proposal 230- Support

Proposal 276- Support

Submitted By  
Liz Landes  
Submitted On  
12/17/2021 4:07:13 AM  
Affiliation



PC232  
1 of 1

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It's culture. It's food. The herring are an essential part of our ecosystem, both marine and terrestrial. There's not much left uncorrupted in our land - let's give the oceans one chance to catch its breath and protect these fish.



Submitted By  
Lorraine Kelly  
Submitted On  
12/17/2021 5:05:59 PM  
Affiliation

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I strongly oppose proposal 101.



Submitted By  
Louis Holst  
Submitted On  
12/15/2021 4:19:23 PM  
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I support proposal 80. Individual gear groups must be responsible for their own overages. Making a different group pay back an overage is not acceptable.

I support proposal 81. Trollers are well equipped to harvest any remaining king salmon quota. By September, all other fisheries are done harvesting. Leaving kings unharvested puts us all in a poor situation at the next treaty negotiation. It's good for everybody, not just trollers.

I oppose proposal 83. I am a troller, and I have markets too. I cannot afford to lose my markets on low abundance seasons. Low abundance is a problem we all must bear the burden of. Giving my fish to another user group is not acceptable. We must all find a way to live within our quota! All user groups were represented at PST negotiations, and knew full well what we are up against. Why should their market be given priority over my market? The lodge and guided sport industry is growing and has no limits. They must grow within their own allocation, and NOT be allowed to grow at the expense of the troll sector.

I support proposal 89. With the historic low effort in the past several years, I feel that this proposal is a positive step towards profitability for the troll fleet. There are many latent troll permits that are currently not being fished. The retirement of vast amounts of aging wooden vessels coupled with the lack of new troll vessel construction has created a situation where many of these permits will never likely be able to be coupled to a viable troll vessel. Allowing permit stacking will bring some of these permits back into profitability. Also, I believe that this is an incredible opportunity for young fishers to enter the fishery. Young permit holders without boats could secure top paying crew jobs on troll vessels that are equipped to fish 6 lines. These young fishers could then learn the trade from experienced professional trollers, thus helping to insure the viable future of the troll fishery.

I support proposal 144. The growth of the rental boat industry has created a new, un-monitored user group. Management must get this data! A logbook program for these users must be implemented.



Submitted By

Lucy Harvey

Submitted On

11/17/2021 10:04:37 AM

Affiliation

My daughter is a Yale Alaska Fellow living and working in Sitka Alaska for Sitka Counseling this year.

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I support proposals 156, 157, and 158. The dangers of overfishing have been documented all over the world, see this study <https://academic.oup.com/icesjms/article/67/9/1830/621607>. Allowing the herring populations to rebuild will benefit everyone, including commercial fishermen. Please let the stocks replenish by conserving current herring populations so that we can guarantee future herring abundance. That way, everyone wins.

I oppose proposals 159, 160, 161, 163, 164, and 165 because they will not allow current herring populations to thrive and recover. Once the fish are gone, they may never come back. As we have learned all too well in other areas of Alaska.

Please take the prudent, safe course of action and protect the herring stocks today.

Respectfully submitted,

Lucy Harvey



Submitted By  
Luke Whitethorn  
Submitted On  
12/14/2021 6:45:49 PM  
Affiliation

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I Luke Whitethorn am a commercial Dungeness fisherman in southeast Ak for 33 years and would like to reject any dungeness closures in southeast Alaska! We have lost a lot of our grounds to sea otters and sport fishermen over the years I've been fishing and many of these areas are Not being used at there full potential as intended! Sport and personal use fisherman can fish crab all year around and we are restricted by season length due to harvest rate( in season management) I would also like to comment on the kasan area that I have fished for over 10 years and the closers of the Harris river was hard enough to swallow and now the new proposal at kasan to shut down more area would take over 50 percent of our fall harvest away from the few crabbers that fish there! We only get to fish kasan in the fall and sport and personal use crabbers get to fish all summer without any commercial crabbers fishing at all! Another kasan closer would be detrimental to the few commercial cravers that fish there in the fall! Thanks for your time!

Luke Whitethorn - FV Haakon



Submitted By  
Lynn and Vince murray  
Submitted On  
12/16/2021 11:55:14 AM  
Affiliation  
None

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Herring numbers have dropped dramatically over the past fifty years under the management of Alaska Department of Fish and Game. It is critical that we do something to reverse this trend before it is too late. Therefore, we support herring proposals 156, 157, and 158 (and oppose all other proposals) as simply a first step in this recovery process. Much more must be done, and we encourage all responsible parties to do just that—place herring recovery ahead of economic interests that disregard the importance of this species and its critical role in a stable ocean ecosystem in Southeast Alaska, an ecosystem upon which numerous other species depend.

Submitted By  
Maegan Bolin  
Submitted On  
12/22/2021 7:15:56 PM  
Affiliation



PC238  
1 of 1

Hello! 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. You have the power and the responsibility to make a difference here. Make it known that you stand with and respect the wishes of indigenous people.

Submitted By  
Mamie Williams  
Submitted On  
11/17/2021 1:17:20 AM  
Affiliation



PC239  
1 of 1

I am a Mamie Williams and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast" "I support proposals 156, 157, 158." "We need to protect the herring to ensure the survival of Washington States critically endangered orcas. Our orcas depend upon Columbia River chinook salmon that rear in Southeast main food source is SE Alaskan herring. Please prioritize protecting the herring for future generations"

Submitted By  
Marcus S Nelson  
Submitted On  
12/22/2021 7:46:21 PM  
Affiliation



PC240  
1 of 1

I am in favor of proposal 163 and 164. ive been in the fishery appx 12 years. i think it would make fishing easier not only for participants but also law enforcement and will be a safer better controlled fishery. less stress or pressure on ADFG. Ive been an Alaska resident all my life (62yrs) and am in support of thes two proposals.



Submitted By  
Mark Holst  
Submitted On  
12/15/2021 5:42:09 PM  
Affiliation

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I support proposal 80. Its unacceptable to me that certain gear groups have to give up fish due to other gear groups catching more than their allocation. we must all live within our means.

I support proposal 81. Its bad for all gear groups to have fish left uncaught. When negotiating the salmon treaty, what gives us the right to ask for more kings, or even just keep the kings we already have, when we don't even catch the fish we have. Why not catch any and all remaining fish?

I oppose proposal 83. We must all live within our means. Reallocating King salmon to a certain gear group at the expense of another is unacceptable, esecially on low abundance years. Low abundance years are a problem for everybody. Its unacceptable for other gear group markets to be filled at the expense of another market.

I support proposal 89. Permit stacking would create a whole new level of proffesionalism in the troll fleet. Not only allowing for proffesional trollers to move forward in the industry it would also create a new class of young fisherman looking to eventually own their own boat. If allowed, young fisherman could buy a troll permit and get a higher paying crew job on a proffesional troller. Not only earning a higher crew share, but also learning and gaining experience from experienced proffesionals.

I support proposal 92. Terminal harvest areas are designed to have a high percentage of hatchery kings, which are there for us to catch. Hatcheries already don't want small kings to spawn anyway, so why not catch them?

I support proposal 144. With a growing "non-guided" charter boat fleet we need to have adequate reporting laws and oversight put in place. Everyone else has oversight, why not them?



Submitted By  
Martin J Fabry  
Submitted On  
12/17/2020 8:28:59 AM  
Affiliation  
Old People

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Prince of Wales Is. ALASKA, Alaska 99925

I would like to propose that the board of fish have this idea passed into law to support senior residents of the state. The proposal is;

Any resident holding a permanent fishing/hunting/trapping license may use two poles (year round) when fishing alone from a boat. This means no other person in the boat. It would be very easy to regulate and check for F & G Officers and it surely would help us seniors.

Please & thank you,

Martin J. Fabry

Klawock, Alaska

Submitted By  
Martine Glaros  
Submitted On  
11/17/2021 4:17:11 AM  
Affiliation



PC243  
1 of 1

I strongly support proposals 156, 157 and 158. We need better protection for Orcas!



Submitted By  
Mary A Stewart  
Submitted On  
12/16/2021 1:54:04 PM  
Affiliation

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We are writing 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. 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 by BoF 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.

Therefore we are writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.



Submitted By  
MaryCait Dolan  
Submitted On  
11/16/2021 6:31:00 PM  
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I support Sitka Tribe of Alaska's proposals 156, 157, and 158. Protect the herring.



Submitted By  
Matt Lawrie  
Submitted On  
12/22/2021 6:49:58 PM  
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360 201 5595  
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I am a lifelong Alaska resident and a second generation commercial fisherman. I have been participating in the Southeast salmon troll fishery based out of Sitka for over 20 years. While I also participate in the Southeast pot shrimp fishery, the bulk of my livelihood comes from the summer troll fishery.

The troll fleet is the largest salmon fleet in Southeast. But it is a fleet that was built largely on the harvest of king salmon, and it is a fleet that has been dwindling for the last thirty years, as our access to king salmon has shrunk, and increased targeting of other species has failed to fully make up the difference. Last years summer troll fishery had the lowest participation on record, with just 63% of the permits fishing. Gross annual income has also shrunk, from an average of \$55,018 per permit fished in the first ten years in which data is available to an average of \$44,025 in the last ten years. Most recently, 2021 was a decent year for the troll fleet, with an exceptionally large chum harvest in the Sitka area, and strong prices across the board providing a bright spot for a fishery otherwise beset by strong headwinds.

I would like to see this march towards obsolescence halted and reversed. I would like to see trolling remain a viable career choice, and I would like to see the troll fleet continue to be a relevant contributor to the regions economy. There are a number of proposals before the board this meeting that will impact the future of the troll fleet. I am thankful for the opportunity to provide input on these proposals, and am hopeful that the needs of the troll fleet will be give equal footing with other user groups in the board process.

Proposal 80 seeks to address a situation that is likely to arise at some point under the current PST, where one or more user groups exceed their allocation of king salmon and cause Alaska to go over the PST all-gear catch limit. I **support Proposal 80** to the extent that guidance is clearly needed to deal with this eventuality. I would like to see language developed that 1.) Holds each group to their annual allocation with the exception of instances when one gear group needs to exceed their allocation in order for Alaska to maximize all-gear harvest, and 2.) Provides a payback provision that holds any group that exceeds its allocation (not withstanding the exception mentioned above) accountable for repayment the following year. I would also like to see domestic payback language that requires payback internally in the event that one gear group exceeds their allocation (again with the exception mentioned above) without resulting in an all-gear over harvest.

I **support proposal 82**, with the amendments recommended by the Sitka AC. As noted in their comments, the department is seeking clarification with this proposal on how the sport fleet is going to be managed to stay within their allocation under the new PST regime. I would like to see the use of in season management as has been used for the last two years, to keep the sport harvest within its annual allocation, rather than managing to attain a 20% average across years.

I **strongly oppose proposal 83**. While it is true, as the proposer states, that in the past the department managed commercial troll and sport to their 80/20 allocation over time rather than annually, that was possible due to the absence of the payback provisions that are now part of the PST. The payback provisions put an end to the possibility of averaging over multiple years within the PST arena. Now SEAGO wants to move that averaging into the domestic management arena, taking from the troll fleet in years of low abundance, and maybe returning those fish in years of high abundance.

While it is a virtual certainty that the guided sport fleet will exceed the sport allocation in years of low abundance with the tiered bag limits proposed in 83, it is far from clear that those fish will be paid back in years of high abundance. With the continual growth in the sport fish industry it is easy to envision a scenario whereby a succession of overages in low abundance years results in an inability for the sport industry to repay the debt as an ever larger fleet continues to harvest at or near their allocation even in years of high abundance, resulting in a defacto reallocation of king salmon from one sector to another.

I submitted and **support proposal 89**. I submitted it with the goal of increasing the economic potential available to individuals currently or potentially participating in the SE salmon troll fishery, while maintaining or reducing overall fleet capacity. This proposal seeks to achieve this goal by providing an individual with the ability to fish six troll wires instead of four south of Cape Spencer during periods of chinook non-retention if they hold two SE power troll permits (permit stacking), or allowing two permit holders to fish 6 lines on one boat (dual permit). This theoretically would allow an individual or a duo to catch marginally more fish - all else being equal - than an individual with a single permit. However, by requiring the use of two permits, the cumulative gear available to fish shrinks from eight to six lines for every two permits used in this manner.

While I hope and expect that established trollers will take advantage of this proposal should it pass, I also foresee this proposal benefiting deckhands and others trying to get into the fishery. In comparison to the expenses associated with purchasing a boat capable of effectively participating in the troll fishery, a power troll permit is quite affordable, especially with credit as readily available as it currently is. Being



able to team up with an existing operation and negotiate a larger percentage as a permit holder offers a stepping stone into the fishery and would allow a new permit holder to build equity while avoiding the complications and expenses of boat ownership.

I have been making a living primarily in the troll fishery for over twenty years. A look at the CFEC earnings data, however, reveals that there are very few trollers grossing enough in this fishery to take a salary above the poverty level after expenses. One reason for this is low abundance and reduced access to king salmon. Another reason is the diversity of the fleet. Many, if not most who participate in the troll fishery do so as part of a diversified income strategy, supplemented by other fisheries or income from unrelated activity. This is great. Trolling allows permit holders to participate in varying degrees more readily than most fisheries. With low permit prices, the ability to use anything from a converted sport boat to a limit seiner and beyond, and nearly year-round fishing opportunities, the fishery attracts all sorts.

What this proposal seeks to do is allow those who want to make a living trolling, rather than treating it as a supplemental fishery or tax shelter, to more easily do so by gaining some small amount of increased efficiency for the modest expense of an additional troll permit. By not allowing six lines during chinook retention periods, and by holding the door open to anyone who wants to buy in, I believe this proposal offers that option without undue negative impact on those who chose not to participate. And by requiring the use of two permits to achieve six lines, I believe this proposal can avoid any real negative impact on inter-gear group coho allocation.

**Proposal 91- I support** the thrust of this proposal. I am not sure that this is the most efficient way to get the intended result, but I agree that there is a need for a more flexible summer king salmon management plan that would avoid overly short august openings in years of low abundance, while also catching the entire troll allocation.

I am not so concerned with the proposers worry that, in years of low abundance, there will be too few kings remaining to accurately manage the august king opening. But I do agree that August openings that last less than four days, when combined with the mandatory fair start coho closure prior to the opening, create an unnecessary loss in prime coho opportunity for the fleet and a real burden on processing and ice capacity. In order to make it worth the coho time lost with the mandatory fair start closure and the obligatory turn around time at the end of the king opening, four days of king fishing seems the bare minimum.

I **support proposal 115** for the reasons outlined in the ATAs comments.

**Proposals 171-174** all propose to change the opening date for the Southeast pot shrimp fishery in region A. I am **supportive** of this notion, though I am not sure which of these proposals or set of dates is the most reasonable. From a purely selfish point of view, a May 15 start date conflicts with the open access lingcod dinglbar fishery, which opens May 16th.



To: Alaska Board of Fisheries

On the Board of Fish Meeting and Covid

12/22/21

Dear Board Members,

I am taking this time to respectfully comment on the Board's decision to carry on having the 2022 January BOF meeting during a raging pandemic. The meeting is to be in a City that is rated a Hot Zone, in a venue with inadequate room for social distancing, and with an inadequate ventilation system. This list of conditions is contrary to all the Covid advice from the CDC, the WHO, and from Alaska's Chief Medical Officer Dr. Ann Zink. The CDC is also currently recommending against all travel.

As a fisherman who's over 70 with comorbidities I feel the BOF is giving me the choice of protecting my livelihood or protecting my health. With the choices offered I can't do both.

Yours

Matthew Donohoe



## **List of Proposals and my positions**

**Proposal: 80 Support**

**Proposal: 82 Oppose Subsection (g) (2). Also support Inseason Management not Averaging over years**

**Proposal: 83 Oppose**

**Proposals: 84, 85, 86 Support**

**Proposal: 88, Oppose**

**Proposal: 94 Support**

**Proposal 115 Support**

**Proposal: 125 Opposed**

**Proposal: 128 Opposed**

**Proposal: 135 Opposed**

**Proposal: 139 Opposed**

**Proposal: 140 Opposed**

**Proposal: 141 Opposed**

**Proposals: 145, 146, 147, 148 Opposed**

**RC6: Northern SE Stocks of Concern**

**Support option A Status quo for trollers**

**RC7: Stikine and Andrews Creek Stock of concern**

**Support option A Status quo for trollers**



## Proposal 82: Concerns

**In the ADF&G Proposal 82, Staff Comments under, "What would be the effect if the Proposal is adopted" is this language:**

*"The department seeks the boards clarification on the use of inseason management to annually achieve the sport allocation under all management tiers, without modification of (b)(1) conflicting guidance remains on whether the department should manage the sport fishery to attain an average harvest of 20% of the annual harvest ceiling across years or annually manage to harvest 20% of the annual harvest ceiling."*

My Comment:

If ADF&G Staff is asking here whether or not Sport Division can average overages in a single season or over a period of years the answer has already been settled in the 2019 PST Agreement.

Because ADF&G, the President and Vice President of SEAGO, and the rest of **the 2019 Alaska "Treaty Team" agreed to no accumulation of harvest underages but an annual "Pay Back" for any overages AVERAGING IS OFF THE TABLE.**

The Department, since 2019, is already managing inseason to the allocation and so far is doing a fair job. As electronic filing of sport harvest improves underages should be reduced but because of the 2019 Treaty Pay-back Clause managers will never achieve 0 underages.

Matt Donohoe



## PROPOSAL 83: Oppose

For Trollers **Proposal 83** is probably the most important proposal at the 2022 BOF. In Proposal 83 SEAGO (Southeast Alaska Guides Organization) seeks to “borrow” fish from trollers during low quota years and pay them back in high abundance years. If this passes Trollers will lose more fish.

Stocks of Concern (SOC) have been with us for four years. We anticipate SOC management to continue for at least 3 more years. At this BOF the Taku and the Stikine Chinook stocks are being declared SOC. In spite of this Sport Chinook harvest is still being allowed in the spring in Western Icy Straights (when SOC are running). Icy Straights is the main inside migration corridor for Taku Chinook. At the same time Sport is also harvesting SOC in Western Summer Straights, the main migration corridor for Stikine Chinook.

- During the Pacific Salmon Treaty (PST) negotiations all gear groups were represented. All groups agreed to the new treaty. This includes the SEAGO President and Vice-President who were on the Northern Panel of the PST and were instrumental in developing the 2019 Agreement. Charters, like every other group, need to comply with the new regulations and manage within their allotted quota.
- The SEAK Troll fishery is high percentage Alaska resident (81% CFEC). Most SEAK charter skippers, lodge owners, and their clients are out of state residents.
- In the 2021 season, even though State Regs recommend an out-of-state annual bag limit at Tier 4 (the 2021 Tier) of three Chinook from March to July 1, the Department set the bag limit at 4. This made the SEAK sport harvest curve unsustainable at the Tier 4 level (37,879 fish). **Unlike in 2020 in March of 2021 SEAK Charter Lodges were claiming on line and in the media full bookings.** Because of the predictable resulting increase in sport (charter) harvest (which the Department for some reason didn't anticipate) ADF&G closed SEAK Out-of-State retention of Chinook (from August 1<sup>st</sup> to August 31<sup>st</sup>). Harvest reopened later but ended 944 sport kings short of their allocation.
- Trollers once Ocean fished kings 365 days a year. Now we have a reduced ocean fishery of around 20 days (in a good year). Trollers can also Winter fish in inside waters 150 days. Three years ago the winter fishery was 45 days longer. Because of SOC Trollers lost six weeks of Winter fishing. SOC has also greatly reduced Troll hatchery fishing time and area.
- **Meanwhile Sports (Charters) have enjoyed continual industry growth on a declining resource.** Unlike Commercial fishermen Charters have no limited entry. **It's time for Charters to experience sustainable fishing not limitless growth.**
- Changing the management plan during SOC with a lawsuit threatening sport and commercial harvest seems like a bad idea. The Treaty CPUE Model is still an experiment. Hopefully SOC management is temporary. A lot of things can change in the future but at this time **there is no King quota shortage for sports. There is just inadequate inseason management.**
  - March 3, 2021 ADF&G Commissioner Doug Vincent Lang (DVL) issued an Emergency Order creating a record (since SOC) (for spring) non-resident annual bag limit (4 King Salmon before Jun 15). This was above the sports King Salmon management plan level (5AAC 47.055) which recommends 3 fish until June 30 then going down to 2 Kings.



- Sport Division's reasoning for the extraordinary 4 fish annual limit was a Covid caused low sports effort. In March of 2021 lodges were already reporting high client demand. In 2018 and 2019 the low sport harvest was due to SOC management that closed inside waters until June 15. Covid was not a low demand issue until 2020.
- The Taku and the Stikine are declared SOC. A large spring Charter effort in Western Icy Straights, Yakobi Island (part of the Taku River corridor) is still occurring as it does around Noyes Island and in Western Sumner Straits (on the Stikine River corridor).
- Under SOC management (Years 2018, 2019, 2020, and 2021) Sports have not caught their quota. This is probably due to the SOC spring closures in inside waters (not Covid). These closures were agreed to at the 2017 Sitka BOF meeting in order to protect returning SOC.
- Until SOC management is lifted (which is not eminent), **if managed responsibly**, there is no shortage of King Salmon quota for sport fishing.
- **For 45 years Commercial Trollers have contributed 3% of their gross to local fishermen funded nonprofit hatchery salmon production.** SEAK Sport harvest benefits greatly from these hatcheries but doesn't support them financially. Since 2020 Sport has harvested over 330,000 SEAK hatchery raised Chinook at an average of 15,000 a year. Most of those king salmon were paid for by commercial fishermen.
- ADF&G creel sampling of sport harvest is limited in the Cross Sound, Icy Straights area (Taku corridor). Nor is there much (or any) non-resident sport harvest sampling in the Sumner Straight area which is on the SOC Stikine River corridor. There are no creel samples taken at private docks (Lodges) anywhere in SEAK. **If the Department is serious about SOC management the Department needs to know what stocks the Charter industry are harvesting.**
- **In the spring of 2021 on the Taku and Stikine Corridors there was a record (since SOC) annual out-of-state sports limit of 4 kings.** Meanwhile the commercial hatchery access troll fishery was severely restricted from historic levels. Both the Taku and Stikine Chinook are now SOC. Rather than setting a 2021 record annual out-of-state bag limit when SOC are present (Spring) ADF&G needs to do more creel samples. The origin of the non-resident sport harvested King Salmon (hatchery, wild, SOC) in these areas is largely unknown due to lack of creel and scale samples.
- PST mandated Stock Monitoring agreements with our Southern Treaty partners (B.C., the Pacific NW States) have never come to complete fruition. These southern folks need to take their share of PST agreements seriously. Alaska does. Alaska needs to demand that they do and that we get our fair share of our historic fishery and not just argue over the bread crumbs.
- Resident sport fish harvest is stable and they are not asking for more of the troll allocation.
- If Proposal 83 passes it would be a precedent saying that non-resident sports clients (Charters) take precedent over resident commercial fisheries.



## Arguments in support of ATA's BOF Proposal 115

The 2019 Pacific Salmon Treaty (PST) specifies that a CPUE Model establishes the all gear SEAK Chinook allocation. ***“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).

- SEAK Chinook all gear harvest is based on the CPUE of Troll caught Chinook in Sitka Sound during ADF&G Statistical Weeks 41 to 48. Opening day of the Winter Troll fishery is October 11. **From 2001-2020 Oct 11 often falls in Week 42, not in Week 41.** In 2021, for instance, October 11 fell on the second day of Week 42.
- Starting the Winter Troll fishery on October 11 means the number of days in the CPUE Model varies from 46 to 53 (See Table). Proposal 115 suggests a constant number of days making a slightly longer fishing period. Standardization of days will eliminate a significant and unnecessary variable providing better data.
- From 2001-2020 **the Winter Troll season opened 8 out of 20 times in Week 42. Not in Week 41. A Week 41 opening was agreed to in the PST.**
- From 2001 to 2020 the CPUE model would have predicted the wrong Post Season A.I. 10 out of 20 times. **That's being wrong 50% of the time.** This is a problem when the point of the CPUE Model is to predict the correct Post Season A.I.
- Before SOC management the 10 year average Winter Troll harvest (2008 to 2017) was 41,798 Chinook/winter. Under SOC management Trollers lost 6 weeks of harvesting the year's most valuable fish during the winter's most productive time. In the three years from 2018 to 2020 the winter fishery averaged 13,381 Chinook. These numbers represent an average harvest reduction of 68%. This devastated the winter fishery and the participants which happen to be predominantly Alaskan Residents. The data also shows that SOC are more available in the spring than in the fall. An earlier opening is less of a problem for SOC than a later closure.
- Proposal 115 allows for a few more fishing days **at a time when SOC spawners are not an issue and conforms to the language of the PST while an Oct 11<sup>th</sup> opening does not.**



## CONCLUSION

- **Proposal 115 restores a small part of lost lucrative Winter Troll access without causing gear group conflicts or threatening SOC. It aligns the Winter Troll season with the PST language and eliminates a significant CPUE Model variable.**

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 most	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

Submitted By  
Matthew Hemenway  
Submitted On  
12/19/2021 10:38:16 AM  
Affiliation  
None



PC248  
1 of 1

Thank you for allowing me the opportunity to comment on the changes being proposed. I am a life long resident of Southeast and an avid subsistence and sport hunter and fisherman. I make my living as a fulltime power troller.

**Prop 82:** I think this is a good proposal because local residents should have priority for the Chinook sport allocation quota. The growth of both guided and unguided nonresident sport fishing in Southeast has been explosive and unregulated. With the high level of nonresident pressure ADFG needs the the tools to make sure resident anglers get the opportunity to enjoy our King salmon.

**Prop 83:** This is a bad proposal. It is a blatant attempt to circumvent the negotiations that resulted in the 20/80 allocation. The proposal claims that it is not a reallocation because the Chinook "borrowed" from commercial fishermen will be "paid" back in high abundance years. However, we are in a low abundance cycle and at this point a high abundance year seems mythical. I feel it is unlikely that trollers would ever see the "borrowed" quota again.

Additionally I think this proposal is unfair because commercial fishermen have already made huge sacrifices to conserve stocks for the future. We gave up the best part of the winter season and all of the spring season. Meanwhile, salmon guiding and boat rentals are unregulated. If the sport industry can not stay within its allocation perhaps it is time to implement a limited entry system for guides.

Alaska power trollers are already being targeted by lawsuits from outside groups. This proposal would be a blow to the small boat fishermen that are important to Southeast's economy and culture. Proposal 83 is bad for the economy of Southeast Alaska. The vast majority of troll permit holders reside in Southeast. The same cannot be said for fishing lodge owners and guides. In my own lifetime I have seen my hometown of Elfin Cove change from a small village with a school and families who were invested in the future of Alaska change into a seasonal fishing camp with most the land bought up by wealthy nonresident lodge owners only interested in what they can ship out of Alaska during the summer.

**Prop 89:** I am against this proposal. I think it would encourage consolidation by bigger boats and increase fishing pressure on coho and Chinook stocks.

**Props 101 and 103:** I am against these proposal. These proposal would be highly detrimental towards commercial fishermen and the economy of Southeast Alaska. Enhanced salmon stocks have become a keystone of the coastal economy and provide opportunity for local fishermen to make a living.

**Prop 144:** I support this proposal because there has been explosive and unregulated growth in the boat rental industry. At the same time resident anglers have seen their opportunity to harvest non-pelagic rockfish completely removed. I have personally witnessed the "self-guided" boat rentals based out of Elfin Cove hammer the pinnacles and humps known for their yellow-eye rockfish day in and day out even after ADFG closed the season. In both Icy Straits and Cross Sound every productive halibut hump constantly has "self-guided" boats anchored up and fishing. Anecdotaly you can see massive stacks of 50 pound fish boxes being shipped out from the float plane dock in Elfin Cove daily. It is not uncommon to see an angler shipping out several hundred pounds of salmon and halibut fillets. This is far more fishi than even a very large Alaskan family can eat in a year. It makes you wonder what is happening to all this fish when it gets down south. Is it being sold to finance the trip? Is it being tossed in a dumpster once it gets freezer burnt? Given away after it is freezer burnt thereby decreasing the publics perception of the quality of Alaska seafood? No effort has yet been made to truly understand the impacts of this large fishery.

This proposal is necessary to begin to understand the impact that this massive increase in fishing effort iduring the last decade is having on fisheries that are already fully allocated. While this proposal so far only applies to halibut it is a step in the right direction.

**Prop 156-158:** I support these proposals by the Sitka Tribe. Herring are base of the food chain in Southeast. Maintaining strong herring populations is essential for maintaining strong salmon and ground-fish populations. Herring need to be managed conservatively because a collapse in herring equals a collapse in predator fish populations. Additionally, many previous herring fisheries in Southeast and through out the North Pacific have already collapsed.



Submitted By  
Matthew Jackson  
Submitted On  
12/21/2021 4:03:19 PM  
Affiliation

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Dear Board of Fisheries,

I am a lifelong Alaskan, born in Ketchikan and living in Sitka since 2013. I am a subsistence fisherman and hunter who spends many weeks on the water every year.

As you know, the herring fishery in Sitka Sound has been contentious for decades. The several proposals before you fall into two camps. On the one hand, you have proposals 156, 157 and 158, proposed by STA, which seek slightly more conservative management that would particularly protect older, more fecund females. On the other hand you have proposals 159, 160, 161, 163, 165 which seek to reduce subsistence access, increase barriers, and expand the scope of the fishery.

When considering the herring fishery, it is just as important to consider what ADFG does not know as what it does know. ADFG has fairly complex understanding of the biomass and age class of the Sitka Sound Herring population going back to the 1970's, but that's about it. Questions around the impact sac roe seining has on the spatial/temporal distribution of spawning behavior, and therefore subsistence harvests, long-term historical population trends prior to 1970s, the importance of herring as a forage fish to other commercially and culturally important species such as chinook salmon, regional population and ecological dynamics, and what it would take to rehabilitate collapsed herring populations are all unknowns to ADFG. Luckily in Southeast Alaska we have a strong record of Traditional Ecological Knowledge that could fill this gap, but unfortunately so far the Board and ADFG has largely neglected to take advantage of this knowledge.

Two points are most important to me. First and foremost, it is critical to understand that 11 out of 13 other herring fisheries managed by ADFG since the 70's have collapsed all up and down the coast, from Dixon Entrance to Lynn Canal. Herring have thrived here for millenia, and in just 50 years ADFG has allowed them to be fished out of most of their range. Therefore, the management of Sitka Sound cannot go on as usual, it needs to be managed extremely conservatively, as it is the only hope to ever reestablish populations across the rest of Southeast Alaska.

Secondly, Traditional Ecological Knowledge tells us that the practice of making multiple test sets and then scooping up schools with the most fecund females is extremely ecologically disruptive to herring, because it is the oldest and most fertile females that initiate spawning behavior and therefore provide temporal and spatial stability to reproductive behavior that is critical to both the subsistence harvest and to herring reproduction itself. By selecting sets with the highest roe content immediately prior to the beginning of spawning, sac roe fisheries pose an extreme threat to herring populations and subsistence users who rely on them. These mature females should be returning to spawn for years to come, yet these are exactly the females who are selected by sac roe fisheries. Again, this dynamic inherent to sac roe fisheries is a reason for extreme conservatism.

It is for these two reasons that I support proposals 156, 157 and 158, because they would provide slightly more conservative management for the last big population of herring in Southeast Alaska, particularly the old, fecund females.

It is for the same reason that I oppose proposals 159 through 165, because they all move the fishery in the wrong direction, either eroding subsistence rights and protected areas, or expanding this already extremely risky and contentious fishery.

Sincerely, Matthew Jackson of Sitka AK

Submitted By  
Matthew Kinney  
Submitted On  
12/22/2021 3:58:07 PM  
Affiliation



PC250  
1 of 1

First and foremost thank you for your time and commitment to helping structure our fisheries. My name is Matt Kinney, Ive been involved with commercial fisheries my entire life and am currently the captain and an owner of the herring vessel Hukilau which also takes part in many other fisheries in the state of alaska. Over the past few years weve watched the Sitka sac roe herring stock blossom into a truly monstorous biomass in which the commercial fleet barely scratches the surface of. Alaska Department of fish and game has done an incredible job with data collection and record since the inception of the fishery and have managed a successful biomass for half a century. We are now at the largest biological boom ever recorded within the sitka sac roe stock, yet even in times where herring are so abundant that us fishermen have to literally carve off corners and chunks of schools of fish to avoid catching too many, the propigation of misinformation has infected the public. People who have never used any sort of marine electronics or directional sounding devices will come forward and claim to know things that they do not. They will fill the room with colorful theories, unbacked by data collection, unbacked by science, which is something we use as a standard in modern times. People who spend less than 10 days a year out on the water in sport skiffs will claim to know it all, and try to convince everyone that the herring are gone. Activists have been hired and sponsored to spin the truth and tell you things that aren't true, many who aren't even from Alaska. No real skin in the game, just here to fight for a cause. I hope you can cut through the haze and understand that the careful data collection of the Alaska department of fish and game is what has built the beautiful biomass that we are privileged to make our livlihood. I dont believe there need to be any more restrictions on a system that is clearly working, and working very well at that.

I am writing to express support for proposals 159, 160, 161, and 233.

I would like to express opposition to proposals 156,157, 158, and 167

Thank you for your time.