From: Darrell Kapp
To: DFG, BOF Comments (DFG sponsored)
Cc: TERRY KILBREATH; Darrell Kapp; Ryan Kapp
Subject: Support for Open Platform Spawn on kelp
Date: Monday, December 20, 2021 9:58:22 AM
Attachments: Open Platform Spawn-on-Kelp, Mundy, Gissberg, Sharr.pdf

December 20,2021

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

Re; Support for Proposal 166 : An alternative gear for GO1A permit holders using open platform spawn on kelp.

Dear Chairwoman Carlson – Van Dort and Board of Fisheries Members,

I attached the document "Open Platform Spawn on Kelp " By Dr. Phillip R. Mundy PhD., Dr. John Gissberg PhD. and Samuel Sharr B.S.

The interesting thing about this document is, even though it was produced in 1996, its still relevant today. Dr. Gissberg on page 6, Legal Context, "Alternative harvest methods such as open platform spawn on kelp do not create additional herring, so it does not make sense to create more limited entry permits which would put even greater pressure on the exiting fishery management system. The open platform method should be viewed as an alternative harvest method for those who already have access to the resource through the limited permit system."

Best regards,
Terry Kilbreath

Do Not use my contact information on printed copies.

Open Platform Spawn on Kelp

An Added Alternative Harvest Method for Sustainable Management of Sitka Sound Herring Fisheries

December 23, 1996

Fisheries and Aquatic Sciences, 1015 Sher Lane, Lake Oswego, Oregon 97034-1744

Sitka Sound Herring Spawn on Kelp
The Open Platform Alternative Harvest Method

Acknowledgments

We thank the following individuals for advice and assistance received; Dave Carlisle, Bill Davidson, Steve Fried, Fritz Funk, Paul Gronholdt, Inez Hopkins, Scott McAllister, Slim Morstad, Dan Nomura, Michelle Ridgway, Herman Savikko, G. Thomas (DFO), and John Wilcock. We thank the following institutions for publications and other information freely provided; Alaska Department of Fish and Game, California Department of Fish and Game, Canadian Department of Fisheries and Oceans, and the Washington Department of Fisheries and Wildlife. The opionions expressed and the accuracy of the facts tendered are solely the responsibility of the authors.

About the Authors

The Fisheries and Aquatic Sciences team which produced this summary and the technical report on which it is based included Phillip R. Mundy, PhD, John G. Gissberg, PhD, and Samuel Sharr, B.S. Dr. Mundy has been working on Alaskan fisheries management problems for over twenty years in communities such as Emmonak, Bethel, Dillingham, King Salmon, Chignik, Soldotna, Cordova, and Juneau. Phil has held positions as Associate Professor at the University of Alaska, and Chief Fisheries Scientist with Alaska Department of Fish and Game, and he now works as a consultant to industry and government. Dr. Gissberg, an attorney who earned his PhD in fisheries, has thirty-five years experience in Alaska fisheries matters. He has served in State of Alaska positions in fisheries science, law, and policy. As Regional Fisheries Attache for the U.S. Department of State in the U.S. Embassy in Tokyo, John was responsible for herring roe quota negotiations for the U.S. Trade Representative. Mr. Sharr has seventeen years of experience as a fishery biologist with the Alaska Department of Fish and Game, serving in Anchorage and Cordova. In addition to his research on the biology and management of salmon and herring fisheries in Prince William Sound, Sam directed the field research program into the effects of oiling on salmon for five years following the *Exxon Valdez* oil spill in 1989. Sam is presently employed a private fisheries consultant.

Notice

This document makes no guarantees or representations regarding the income which may be derived from commercial fishing in the future. Models of fishery value and average income per harvester are provided for the purposes of illustrating the potential of the alternative harvest method relative to past perfomance of other harvest methods only. Since future economic outcomes depend on many factors which may change through time, the income achieved by an individual harvester or fleet cannot be predicted.

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Introduction

We believe a herring harvest method which has been successfully applied in California and British Columbia for over ten years offers new opportunities and challenges for the managers and harvesters of herring in the area of Sitka, Alaska. Open platform herring spawn on kelp fishing would provide a unique way to increase the value of a major commercial fisheries resource without affecting its sustainability, while at the same time providing managers and regulators of the resource more options and less stress. The following summary of the biological and legal research has been conducted at the request of an interested group of Alaskan herring harvesters.

While this summary is based on a more formal, technical report containing additional data, scientific, and legal sources (available upon request from the address on the cover), we have tried in this summary to explain the method of open platform spawn on kelp harvesting with a minimum of technical jargon.

The Herring Spawn on Kelp Opportunity

Open platform harvesters suspend kelp leaves, known as blades, down into the water from lines attached to floating platforms which are located in areas where herring are known to spawn. As the herring spawn, their eggs stick to the blades, making a highly valuable seafood product known on the international market as *kazunoko kombu,* and in the restaurant trades as *tanzaku* and *komochi kombu*. The blades are detached from the line and removed from the water when the proper thickness of eggs has been deposited. Blades are trimmed of any areas which do not meet strict product quality standards, and placed in a tote for delivery to market. The trim is returned to the water where the eggs may hatch. Strict product quality standards bring the best prices and help hold market share.

While experience with management, harvesting and marketing in other parts of the west coast has demonstrated the ability of spawn on kelp to add value to herring harvests, we started by asking whether this information applied directly to the Alaskan management system, and to the particular circumstances of the Sitka Sound area. Any new harvest method needs to be carefully developed to fit the nature of the waters, the resource, the existing management program, and the community in which it operates. Responsible fishery development works from a firm knowledge of the local biology of fish and kelp, the management opportunities and challenges, the market opportunities, and the ecological, legal and cultural contexts of the state and the borough. An opportunity to add value to Alaskan fisheries needs to be carefully weighed against its ability to work within the existing program of sustainable management of the herring resources.

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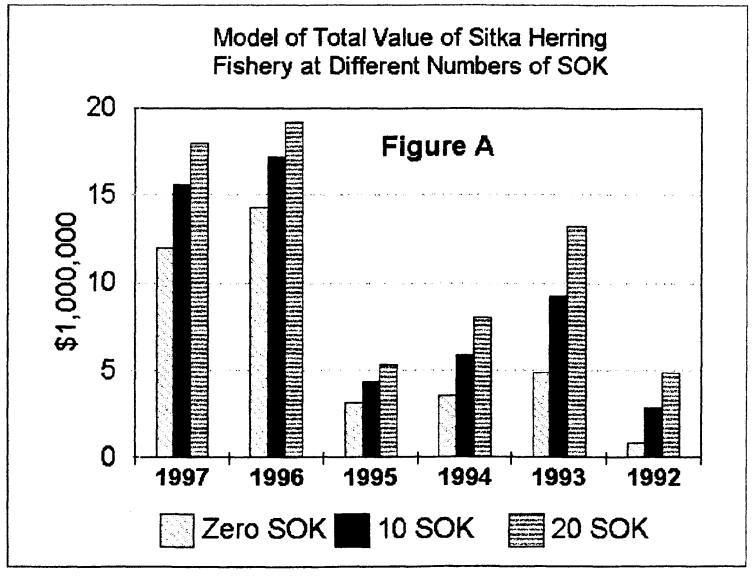
Market Opportunities

A good reason to consider the alternative of open platform herring spawn on kelp is the opportunity to add value and market opportunities to the herring resource. By diversifying the herring product, the normal ups and downs in availability of herring stocks, and prices for individual products, may be offset.

Markets for herring spawn on kelp in Japan are diversifying and growing. Of the two basic market opportunities in Japan, the traditional year-end gift market, and the emerging restaurant and sushi bar market, the the open platform product is best suited to the restaurant market. Product destined for the gift market requires a very thick coat of eggs, which is not readily available from the open platform harvest method. In the growing restaurant market, the standard product, known as *tanzaku*, or *komochi kombu*, has the thinner coating of eggs characteristic of natural spawning which is obtained from the open platform harvest method. The year around consumption in restaurants and sushi bars provides a marketing advantage over the seasonal year end gift market which is limited in scope and duration. A product which is consumed year around means less volatility in demand.

A model of the possible economic benefits to the Sitka Sound herring fishery of adding the open platform spawn on kelp harvest method was developed. The model applies the harvest management approaches and market information from spawn on kelp harvests in other localities to the historic, and 1997 projected, allowable harvest levels and prices for the Sitka Sound herring fishery. The model had three outcomes which were very promising for the addition of the alternative method; 1) increased total landed value of the Sitka herring fishery, 2) increased annual relative income for individual entry permit holders who fish spawn on kelp, and 3) stable or increased relative income for individuals who use seine harvest methods. The first model outcome is shown in Figure A, where the combined seine and open platform harvest methods increase the total landed value of the herring fishery in direct relation to the proportion of the permits which use the open platform method. As the number of permit



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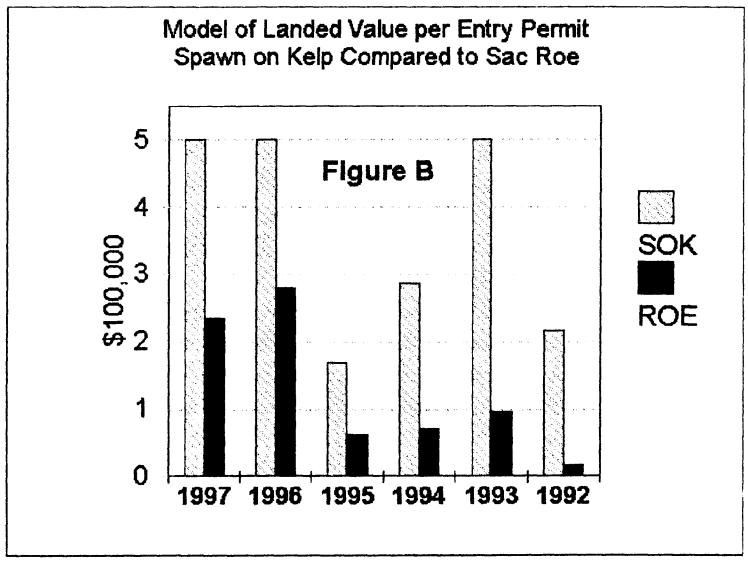
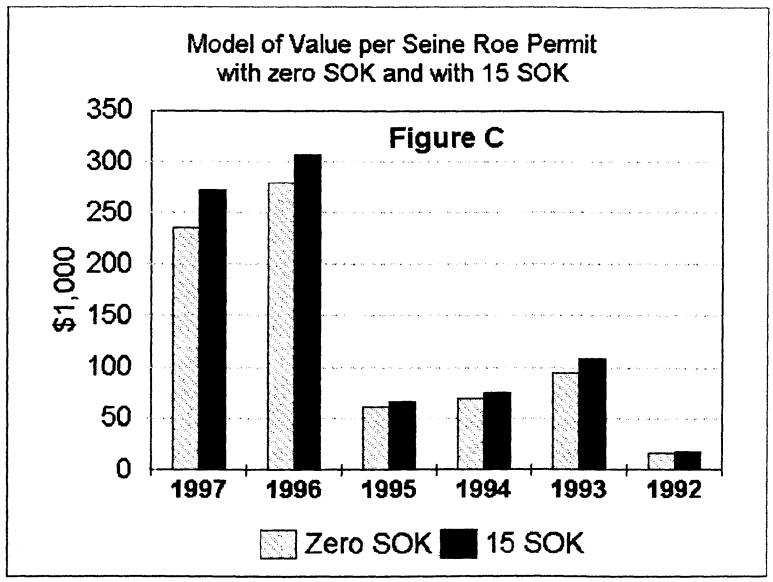
holders who harvest by the spawn on kelp method increases, the overall landed value of the fishery is projected to increase.

The second model outcome, illustrated in Figure B, is that the average annual landed value of a permit using the spawn on kelp harvest method is expected to be higher than that of a permit using seine harvest methods. The difference in expected incomes is due to the higher average unit price paid the harvester for the spawn on kelp product. The third model outcome, illustrated in Figure C, demonstrates that the permit holder who prefers the seine method is more likely than not to receive increased relative income, as the number of permits fishing spawn on kelp increases. A positive effect of spawn on kelp harvest on average income per seiner is expected because the annual weight of product a kelper can handle is limited, and because the kelper's product includes the weight of water absorbed by eggs and the weight of the kelp. As a consequence, the model's average annual value per Sitka seine roe harvester was higher with the spawn on kelp harvest method in place than without it, as illustrated in Figure C. To address kelper capacity, the model returns 20% of the average share of the total allowable harvest of each spawn on kelp harvester to be split among the remaining seine harvesters. So the expectation from the model is that the spawn on kelp alternative harvest method can increase the average annual landed value of all Sitka Sound herring entry permit holders, whether or not they choose to use the alternative.





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Of course all model projections are based on past information, and the actual changes in landed value which may be achieved in the Sitka herring fishery in future years will depend on the prices paid for the seine roe and spawn on kelp products, the proportion of permit holders who choose the spawn on kelp alternative, and the levels of allowable herring harvest, among other familiar factors. To give an idea of the model assumptions which are more fully described in the technical report, an example of the model is shown in the box on the last page of this report.

Will the open platform method replace the seine method in the Sitka herring fishery? It's not likely. In fact, in years of high abundance, it is unlikely that an entry permit holder fishing open platform gear would attempt to catch as much as an average share of the allowable harvest. As is the case with any premium seafood market, the *komochi kombu* market can be expected to fluctuate in accord with production from California, Puget Sound, British Columbia and Prince William Sound. It is likely that harvesters will make a decision on how much product to harvest based on market conditions each year, and it is likely that the amount of spawn on kelp product actually harvested each year would be only a fraction of the total allowable harvest of Sitka herring each year.

Sustainable Management Opportunities and Challenges

Managing for a sustained yield for the maximum benefit and the maximum use consistent with the public interest are Alaskan ideals written into the state constitution. Sustainable management means providing for the conservation needs of the herring resource while offering fair harvest opportunities for subsistence and commercial harvesters. But estimating how many herring can be safely harvested each year is never an easy task for managers, and once the fish are harvested there are no second chances for managers to make a better estimate. Present harvest management does a good job of protecting the herring resources, but in so doing it has to overcome substantial technical challenges under considerable pressure each year.

Increasing harvest management options is another of the reasons why development of the open platform herring spawn on kelp harvest method is very much worth taking time to consider, since this method of harvest offers the possibility of second chances in making management decisions. Combined with traditional methods of herring harvest, the open platform method could make it easier for managers to achieve their annual sustainable harvest objectives. For example, in situations where the harvestable biomass of herring was too small, or too geographically concentrated, to permit authorizing a seine fishery, the open platform alternative might be used. Open

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platform gear could harvest small quantities by controlling the number of platforms each permit fishes. The concern of over harvest is reduced by platform fishing, since amounts in excess of harvest targets could be left in the water to hatch. At any given locality the actual proportion of herring eggs on the kelp which would hatch successfully if left unharvested is initially an unknown, although experience in British Columbia indicates hatching success could be high.

An important question to answer with regard to development of the open platform harvest method is how the spawn on kelp harvest will be counted against the number of herring which can be safely harvested each year. A conservative approach is to develop a conversion factor which is multiplied into a ton of allowable roe herring harvest to give the equivalent weight in spawn on kelp. The harvest limit for the spawn on kelp harvest method is then set by applying the conversion factor to the sustainable harvest limit for the whole herring fishery. For example, in other herring fisheries, the conversion factor of 412 pounds of spawn on kelp product per ton of spawning herring (20.6%) has been used to guide harvest management.

Why is the 20.6% conversion factor considered conservative as a harvest management guideline? With regard to harvest, in practical effect, because absorbed water and added kelp cause eggs on kelp to weigh more than eggs before spawning, open platform fisheries would actually take fewer eggs, pound for pound of herring, than sac roe fishing. With regard to the reproductive capacity of the stocks, the allowable harvest for the present Sitka herring seine roe fishery is the number, or weight, of herring which can be removed from the present population without reducing its ability to produce future generations of herring. Since removing eggs does not remove, or kill, the herring, and since some of the herring will live to spawn again, removal of 412 pounds of spawn on kelp cannot have the same impact on future production of herring as removal of a ton of herring spawners. By trading spawn on kelp for spawners, the harvest manager gets a bonus in future production.

In the proposed management plan which is outlined at back of this document, experience from other fisheries has been used to suggest how an open platform spawn-on-kelp alternative harvest method could be added to the sac roe fishery of the Sitka fishing district. Suggestions on answers to such questions as how the amount of harvest each year can be determined, how the amount actually harvested can be controlled, and how the harvest data can be collected and interpreted are also addressed in the narrative at the end of the management plan outline. These suggestions are based on a synthesis of information from other fisheries, but the right answers specific to the Sitka district will need to be worked out before the alternative

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harvest method can be made available. Some more detailed ideas on how to answer these questions are available in the companion technical report which is available on request to the address on this page. The question of how the open platform alternative may fit in with the limited entry process is addressed in the next section.

Legal Context

How does a new harvest method work in a limited entry fishery such as the Sitka Sound herring sac roe harvest? How would the Commercial Fisheries Entry Commission approach the matter of deciding who would harvest the spawn on kelp?

Since the Sitka Sound seine fishery already fulfills the conservation, management, and economic requirements of Alaska's limited entry statutes, the fishery is not open to new entrants. See Southeast Alaska Roe Herring Purse Seine Fishery - Optimum Numbers Report, Commercial Fisheries Entry Commission (1992). Alternative harvest methods such as open platform spawn on kelp do not create additional herring, so it does not make sense to create more limited entry permits which would put even greater pressure on the existing fishery management system. The open platform method should be viewed as an alternative harvest method for those who already have access to the resource through the limited entry permit system.

Therefore, on the basis of experience in other parts of Alaska, the current permit holders could harvest the spawn on kelp. Administratively, current permit holders could opt for the platform harvest by trading their share of the sac roe quota for a roe on kelp quota. As explained elsewhere, the weight of the roe on kelp share would be different from the sac roe quota by an amount to be determined by fishery managers. The total weight of roe on kelp and the sac roe harvest each year would be set by fishery managers to meet the objective of providing for sustainable use, as is now the case.

How has the use of alternatives to seine harvest been treated in limited entry herring fisheries in other parts of Alaska? In Prince William Sound the harvest of various species of kelp-bearing herring roe from the spawning areas may be the oldest of the herring roe fisheries. These wild herring roe fisheries had a harvest allocation along with other herring fisheries, such as the food, bait and sac roe fisheries. By incrementally reducing the wild roe allocation, starting in 1979, an allocation was made for PWS spawn on kelp harvesters who hung blades of kelp inside a floating net pen enclosure called a pound net. In this type of fishing, the herring are caught by purse seine and placed into the pound net containing the kelp to produce the kazunoko kombu product.

Thus, the legal basis for a spawn on kelp platform fishery in Sitka Sound exists and

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can be adapted from existing fisheries in Alaska and elsewhere.

Ecological Context

The open platform herring spawn on kelp harvest method is attractive in an ecological context because it offers fishery regulators and managers the opportunity to provide increased commercial value, while lowering the proportion of the spawning population killed during commercial harvesting operations each year. Under the spawn on kelp harvest method, a greater landed weight of finished product with a higher unit value is obtained from each spawner. This is possible due to the added weight of the kelp, and because each herring egg absorbs enough water after being released from the spawner to weigh more than half again what it weighed inside the spawner. For example, the 200 pounds of roe that would be recovered from 2,000 pounds of 10% roe herring taken by seining would be increased by water absorption and kelp to approximately 412 pounds of marketable product.

Risk of harvest to the future productivity of the resource is further reduced, since many of the herring spared by spawn on kelp harvest will live to spawn again the next year. Herring spawn on kelp fishing focuses the loss due to harvest on a single generation, or cohort, rather than spreading the losses across a number of future generations, as happens when the spawner is killed. To take one important herring age class as an example, 1,000 six year old spawners, when harvested by the seine roe method, would provide no further benefit to the fishery. But the same 1,000 six year old herring when "harvested" by the spawn on kelp method, would contribute 360 seven year old spawners in the next harvest year, at 36% annual survival.

By focusing harvest on eggs, thereby increasing the weight of product produced by each spawner and sparing the spawner, open platform fishing converts potential losses from the herring populations into valuable product and future herring production. Although there is a relation between the biomass of herring spawning in Sitka and future production of herring, the chances of any one herring egg hatching and surviving to produce a spawner are very slim. Each mature adult herring has won an ecological lottery by surviving long enough to spawn. This is why a spawner can be thousands of times more valuable to the future of the population than an egg. Open platform spawn on kelp harvest does not diminish the importance of the relation between spawning stock and future production of herring. It is, however, important to recognize that a significant demographic risk inherent in harvesting whole herring is not present in open platform spawn on kelp harvests.

The open platform spawn on kelp method is a good candidate for incorporation into sustainable harvest strategies because it

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may lower the risk of harvest management actions to the future of herring populations, but what about the kelp? In an ecological management context adding another species to the management equation requires concern not only for the future of herring populations, but for the future of the kelp populations as well. Since giant kelp beds help support diverse marine life, including sea urchin, abalone, and salmon, the harvest of kelp in a sustainable manner is an important concern.

Fortunately, some studies have been done on the biology of giant kelp, known to scientists as *Macrocystis*, in southeastern Alaska. A comprehensive survey of giant kelp biomass has not been conducted in southeast Alaska since 1913. That survey, which did not cover all of southeastern Alaska, estimated a standing crop in excess of 400 thousand tons. Although giant kelp is found from Dixon Entrance to Icy Straits, it is often harvested from the west side of Prince of Wales Island, not far from the city of Ketchikan. The biomass annually harvested in southeastern Alaska since 1980 has varied from four to 45 tons. The peak harvest of 45 tons is 0.01 percent of the biomass estimate of 1913, so even given substantial interannual variability, the amount of giant kelp needed for the alternative harvest method should be sustainable.

Conclusions

Together the open platform spawn on kelp and the purse seine sac roe harvest methods offer more options for maintaining a sustainable herring resource and increasing income per permit than could be provided by either method alone. By diversifying product, and by increasing the landed value of product per pound of herring harvested, the combined methods offer to put the fishery and allied businesses on a more stable economic base. By reducing the number of herring killed per ton of product landed, the combined methods offer resource managers the unique opportunity to decrease average fishing mortality while increasing the average value of the fishery. We hope you find both types of offer interesting enough to want more information, and to support development of a fishery management plan for Sitka herring which includes the alternative harvest method of open platform spawn-on-kelp.

On the pages following is an explanation of how the alternative method might be implemented in fishing regulations, and a table which illustrates what the catches and incomes might have been under the allowable harvest levels of past years, and as projected for 1997.

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OUTLINE OF PROPOSED AMENDMENT TO TO 5 AAC 27.XXX; 5 AAC 39.105. REFERENCE ALASKA BOARD OF FISHERIES 1996/1997 PROPOSALS, # 441, PAGE 296.

The following is an example of how the fishing regulations implementing the open platform spawn-on-kelp fishery in conjunction with the sac roe fishery could work.

1. An alternative harvest method is made avilable to Sitka sac roe seine permit holders in the form of open platform herring spawn-on-kelp, SOK.

2. Each permit holder declares early in the calendar year if the the permit will be used to fish SOK or sac roe. A permit cannot fish both methods in the same year, so once declared, the permit is locked in to the SOK fishing method for the year.

3. A permit holder may operate from one to three SOK platforms of fixed size. The department shall set the number of platforms annually according to the total allowable harvest of herring.

4. Harvest limitations for SOK

(A) when the total harvestable biomass divided by the number of permits is equal to or greater than 152 tons, no permit holder fishing SOK may harvest or sell more than 25 tons of SOK. [See example years 1993, 1996, and 1997 in box following.]

(B) when the total harvestable biomass divided by the number of permits is less than 152 tons, no permit holder fishing SOK may harvest or sell more than eighty percent of 20.6 percent of the total harvestable biomass divided by the number of permits. [See example years 1992, 1994, 1995 in box following.]

(C) once the permit holder fishing SOK has harvested or sold the weight of SOK specified in 4A or 4B, any hung kelp remaining on the permit holder's platform(s) shall be left in place until the attached herring eggs hatch or die of natural causes. [Note: In all cases a permit holder fishing SOK is regulated to take less than an average seine catch of sac roe. As a result, the amount of roe herring which could be made available to be harvested by seine gear is expected to increase as the number of permit holders fishing SOK increases. See rows 9 - 12 in the box following.]

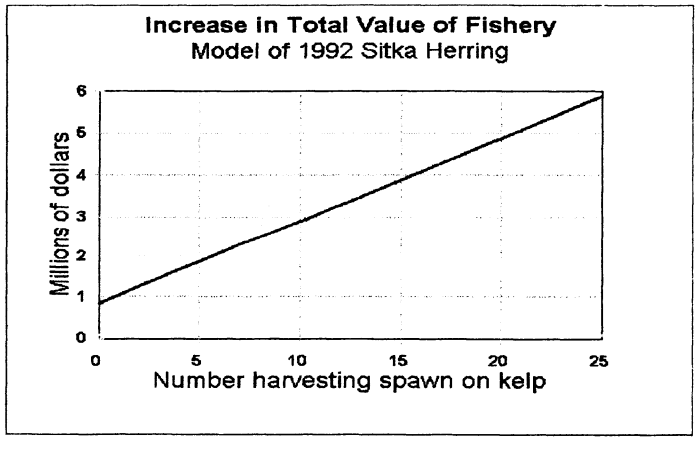
Management Considerations

Identification of individual platforms and weighing of product may be similar to other Alaskan herring pound fisheries. The unit of gear is the platform, and harvest is controlled by the number of platforms, and by monitoring the weight of product landed. Pounds SOK landed can be related to the harvestable biomass estimate by the conversion factor of 0.206 tons of SOK per ton of 10% sac roe herring. In age structured models of herring production, the equivalent biomass of sac roe

Model Results of Open Platform Herring Spawn on Kelp Harvest Method Applied to Sitka

Year	1997	1996	1995	1994	1993	1992
1. Allowable Harvest, in Short Tons	10,000	8,144	2,609	4,432	9,691	3,356
2. Average harvest per permittee, 51 permits (tons)	196	160	51	87	190	66
3. Harvest returned to SR fishery per SOK (tons)	75	39	10	17	69	13
4. Harvest quota to determine SOK share (tons)	121	121	41	70	121	53
5. Harvest retained by SOK permittee (tons of SOK)	25	25	8	14	25	11
6. Harvest SOK [maximum 50,000] (thousand lbs)	50.00	50.00	16.86	28.64	50.00	21.69
7. Value SOK at $10.00 per lb. (thousands)	$500.0	$500.0	$168.6	$286.4	$500.0	$216.9
8. Average price per ton for roe herring	$1,200	$1,750	$1,200	$800	$500	$250
9. Value seine roe per permit, 0 SOK (thou)	$235.3	$279.5	$61.4	$69.5	$95.0	$16.5
10. Value seine roe per permit, 10 SOK (thou)	$257.2	$295.8	$64.4	$72.9	$103.4	$17.3
11. Value seine roe per permit, 15 SOK (thou)	$272.7	$307.4	$66.5	$75.3	$109.3	$17.8
12. Value seine roe per permit, 20 SOK (thou)	$293.1	$322.7	$69.3	$78.5	$117.2	$18.6
13. Value, combined fishery, 0 SOK, (millions)	$12.0	$14.3	$3.1	$3.5	$4.8	$0.8
14. Value, combined fishery, 10 SOK, (millions)	$15.5	$17.1	$4.3	$5.9	$9.2	$2.9
15. Value, combined fishery, 20 SOK, (millions)	$18.0	$19.2	$5.4	$8.0	$13.2	$4.9

removed by SOK could be treated as dead herring by proportionally removing it across the recruited age classes before calculating production. Although this is a conservative assumption for the purposes of achieving conservation, this approach lacks biological similitude, since the herring are not, in fact, dead. As experience with SOK harvest increases, the effect of SOK should be to reduce the reproductive potential of the population which should be apparent in estimates of the Ricker parameter alpha, if the level of SOK is sufficient to be detectable. Low levels of SOK harvest may be lost in the interannual variability, given the many factors which intervene after the egg stage to determine the rate of recruitment of a cohort.



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Fisheries and Aquatic Sciences, 1015 Sher Lane, Lake Oswego, OR 97034

Submitted By
Tessa Schmidt
Submitted On
12/22/2021 6:34:17 AM
Affiliation

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617 Katlian St
Sitka, Alaska 99835

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

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

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

Submitted By
Theresa Weiser
Submitted On
12/22/2021 11:51:50 PM
Affiliation

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Sitka, Alaska 99835

December 22, 2021

Greetings to the Alaska Board of Fisheries:

Thank you for this opportunity to comment on Proposal 82 and Proposal 83. My name is Theresa Weiser. I am a local Sitka resident, since 1985. I own and operate Alaska Premier Charters, Inc. dba Wild Strawberry Lodge owning seven 31 foot charter vessels all built in Sitka by local boat builders. We provide jobs for 40 employees, many of which support their families from the jobs my company provides them. These jobs are very important to each and every employee. I have been in the saltwater sportfishing resort business for over 32 years and live here year-round. My two daughters were born and raised in this lodge environment and are finishing up their college business degrees. They plan to stay in Sitka and carry on our family business in the years to come, which in turn continues to bring outside revenue to our local town.

I speak in support of Proposal 83, because it will maintain sustainability for the resource, keep access for resident anglers, and also provide stability for the guided sportfishing industry. This in turn provides jobs, supports households, coastal communities, and the state economy from the large amount of outside dollars brought in by the economic engine of the saltwater sport fishing industry.

I am opposed to Proposal 82, because it will have the opposite effect on our industry in low abundance years, by having in season management disruptions, unpredictable closures, and creating negative impacts for the sport harvest, particularly in proposed sport management tiers (f), (g), and (h).

Alaska does not give away large amounts of fishery resources to non-residents. Non-residents pay dearly to come to Alaska as independent travelers and harvest relatively small amounts of fish for their personal consumption. The state and local economies benefit greatly from this harvest opportunity provided to non-residents.

Our sport fishing businesses are all about marketing the opportunity, which means no in season changes to regulation. In order to meet the needs of lodge operators to market to their customers, there has to be opportunity provided thru reasonable bag limits and annual limits thru out the whole season. Proposal 83 accomplishes this.

One of the Goals of the Division of Sport Fish is to conserve, manage, and enhance recreational fishery resources, optimizing economic and social benefits for Alaska Coastal Communities as well as to maintain a sustainable resource. King Salmon are a highly prized sportfish! The value of one King Salmon sport caught by a non-resident (bringing outside dollars into this state and all our local communities), is at least ten times the value of one same size commercially caught King Salmon!

Why would the State of Alaska want to deny non-residents the opportunity to contribute $$$ to the local coastal communities?

Why is it okay for non-residents to purchase any amount of commercial caught fish at retail prices to take home – yet if they prefer to catch their own fish this is frowned on and perceived as excessive or wrong? All these fish are legally caught within established bag and possession limits. Many of the fish boxes at the airport contain commercially caught fish purchased locally from commercial vendors. I personally have had many clients purchase additional fish to take home for many reasons: Time of season is not open for lingcod, and/or demersal rockfish, and/or King Salmon; bad weather prevented catching fish, or fishing was slow, etc. Each year the actual number of pounds of fish my clients take home has gone down from an average of 1.95 boxes per client back over 20 years ago to now, it is less than 1.1 boxes average per client this last season and 90% of my fishing clients will fish an average of three days. (This is a 50 lb. box of which has a net of 46 pounds of fish product because the box and liners weighs four pounds.)

In closing I would like to thank the Board for their considerations of all our comments and ask them to give support to Proposal 83 because it will provide stability to the saltwater sportfishing industry, while still maintaining sustainability for the King Salmon resource and supports keeping resident access open.

Thank you for your consideration of my comments.

Sincerely,
Theresa Weiser

Submitted By
Thomas A Fisher
Submitted On
12/21/2021 12:42:53 PM
Affiliation
Self

Action plans for Chinook Stocks of Concern

The action plans need to have some flexibility, evidence is mounting that Chinook abundance in SEAK is improving. The aggregate of spawner Chinooks in SEAK in 2021 has dramatically increased since 2016, even though there is still a couple systems that haven't met BEG. The amount of immature (shakers) in the near shore environment has dramatically increased in the last couple years. Although there isn't any benchmarks other than antidotal reports to measure the overall abundance of shakers, I would be happy to take the board on a boat ride and show the board first hand. Two years ago the out migration of Chinook Fry on the Stikine river were at or near record. The Unuk River has met escapement the last 2 years, the King Salmon River which is losing spawning habitat due to the glacier melting has met goal this year. The Situk, Alsek, and the Chilkat have all met escapement the last three years. As a matter of fact by definition the Chilkat should be delisted as a stock of concern by definition, it has met escapement goals the last 3 years consecutively. The ocean temperatures in the Gulf of Alaska was 2 degrees cooler than normal for November. When a person looks at the winter troll harvest for the fall of 2021, one can see there are landings in various districts that haven't seen harvest in the fall in quite some time. When you add it all up the conclusion is Chinook stocks are rebounding and have responded to fishing restrictions. Looking at the fact that the Board of Fish doesn't meet for another 3 years there needs to be more flexibility in Action Plans, to allow some increase harvest opportunity for all users as Chinook Stocks improve in SEAK.

An example of flexibility in Action Plans is with the increase production of Unuk Chinook spawners a realization that some collateral damage inside the Mountain Point and Carroll Inlet spring troll fishery is acceptable and to allow more fishing time for trollers to harvest predominant hatchery stocks in these two areas. Trollers should not be denied harvest opportunity because a few Unuk Chinook follow hatchery chinook into a relatively small and closed off area. When one looks at how the Unuk Chinook has rebounded and responded it is obvious that closing large swaths of area to spring trolling has addressed the biological issues concerning Unuk Chinook. SSRAA the operator who releases these hatchery Chinook has tried to act responsibly by moving these hatchery fish out of the Behm Canal corridor to reduce impact on the Unuk Chinook. Another avenue to address this issue is to have the department explain the expansion of Unuk tags inside specifically Mountain Point and Carroll Inlet spring troll fishery. What I am driving at is the expansion of a few strays into these two spring fisheries is not an accurate representation of true abundance of Unuk Chinook spawners in these areas.

As a life time resident of SEAK I urge the board to protect resident angler access to harvest Chinook. The resident angler has no commercial interests and is the least represented at the Board of Fish table.

I am in full support of all SSRAA proposals.

I support proposal 82 as amended below

82: support with AMENDMENTS to ensure resident priority- This proposal is mostly about codifying the out-of-cycle changes that the BoF has made piecemeal in response to the terms of the 2019 updates to the Pacific Salmon Treaty. Generally, the proposal formalizes the status quo. I support that objective, but urge the BoF to adopt these two changes to the proposed language:

1st change: To clarify that nonresident sport king fishing opportunity should always be adjusted to ensure that the resident fishery remains open:

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

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

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

retention or closed fishing for king salmon once they reopen.

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

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

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

(2) when wild stock management measures are unnecessary:

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

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

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

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

• In the absence of a designated saltwater C&T finding for Chinook, most SE Alaska residents meet their subsistence king salmon needs through the sport fishery. As such, it important to prioritize the resident sport fishery above the charter fishery (and above the commercial fishery, though this proposal does not speak to the latter).

•

The BoF has a long history of prioritizing residents. The third point of BoF Findings #93-145-FB dated March 1992 states:

• In comparison to the non-resident catch which has greatly increased, the resident sport harvest has remained steady for decades. There is no reason to further restrict resident opportunity. The resident catch is not the reason for the current or past allocative conflicts.

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

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

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

o There must be a commitment from the Sport sector that any fish "borrowed" from the trollers will be paid back by a reduction in the following year's catch- rather than just waiting until the sport harvest happens to be under their allocation.

o If in-season management is not implemented every time the projected harvest is above or below 20%, there needs to be a well-defined

range for acceptable deviation (perhaps +/- 1.5% of the combined sport-troll allocation). If in-season catch data proj
will end up outside of that range, in-season management shall be implemented to keep the harvest within the accep

Submitted By
Thomas Fisher
Submitted On
12/22/2021 12:23:26 PM
Affiliation
Self

With all the issues surrounding Covid I would like to advocate for canceling the SE FINFISH MEETING.

Submitted By
Thomas Nelson
Submitted On
12/17/2021 10:27:10 AM
Affiliation

Members of the Board of Fisheries,

My name is Thomas Nelson, I am from Homer, AK, and am a lifelong resident of Alaska. I have been involved in Alaska fisheries all my life growing up on fishing boats. I have been involved in the Sitka Sound sac roe fishery for 33 years and as a captain for 18 years, The Sitka herring fishery is an important part of my fishing operation, which is my primary source of income.

I would like to comment on several proposals affecting the Sitka Sound sac roe fishery.

I SUPPORT 159 repeal a 2002 ambiguous regulation

I SUPPORT 160 return the area closed to sac roe harvest in 2018, while keeping the original core area closed for subsistence. There was no scientific justification for this closure in the first place, it was purley political.

I SUPPORT 161 requiring a permit for subsistence harvest to have a better accounting of participation and harvest is more than logical. How can you make board decesions without actual data of participation levels?

I STRONGLY OPPOSE 156

I STRONGLY OPPOSE 157

I STRONGLY OPPOSE 158

All these proposals seek to reduce, disprupt, or otherwise negatively effect the sac roe fishery. The ADFG has successfully managed this fishery based on scientific data and harvest models. The Sitka Sound herring Biomass is at all time highs with this harvest model, the stocks are in no way depleted or reduced. These proposals need to be called out for what they are, purely politcal attacks on the fishery with no scientific justification.

Thomas Nelson

Submitted By
Thomas Upah
Submitted On
9/5/2021 4:59:43 PM
Affiliation

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Anchorage, Alaska 99507

There comes a time when the health of the ecosystems become more urgent then financial gain. Commerical fishing of all salmon is continually decreasing salmon numbers. It is true that banning all salmon fishing for at least one season maybe longer would devastate an industry and cause difficulties. If Commerical fishing of salmon is allowed to continue the salmon may not be able to recover. Certainly any people losing income or jobs will most likely recover. In my mind the choice is simple but unpopular. Thanks for listening.

Submitted By
Tia Atkinson
Submitted On
12/21/2021 5:45:21 PM
Affiliation

Phone
9078218126
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Aknativewildflower@gmail.com
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P.o box 209
METLAKATLA, Alaska 99926

I support proposal 156, 157, & 158 and oppose proposals 159, 160, 161, 163, 164, 165

Submitted By
Tisa
Submitted On
4/22/2021 8:54:46 PM
Affiliation
F/V Carlynn

Phone
907-321-4279
Email
tisabecker@gmail.com
Address
PO Box 240238
Douglas, Alaska 99824

TO: Alaska State Board of Fisheries

FROM: Tisa Becker, Secretary F/V Carlynn Inc.

DATE: April 21, 2021

SUBJECT: Request for Alaska State Board of Fisheries to generate proposal to address Southeast commercial red crab allocations.

Executive Summary

The current commercial red crab fishery for Southeast, Alaska has been closed for years to commercial users. Sport fisherman have had several red crab openings where sustainable yield was addressed and managed effectively. If current regulations were changed or lifted, the same adaptive management principals could be applied to the commercial fishery. Equal quota shares, (EQS) similar to those distributed in the Clarence Straight and Chatham Straight sable fisheries, act as a venue for biologists to adjust quota in a manner where management and stakeholder feedback enhance the governance principals of the fishery.

Politically, the equal quota shares system has been considered a liability to those who have legislated similar management in the past. Management protections should be addressed in the Alaska State constitution; especially those similar to federal regulations, such as the individual fishing quota shares. From an adaptive management perspective, Individual Fishing Quotas (IFQ) are synonymous with EQS. I urge the Alaska Board of Fisheries to lobby for enhanced management and protection for their work with proposals and recommendations. Greater flexibility in management solutions will be warranted in the future with climate change, the Board needs to mitigate liability through policy and legislation to secure administration so that management plans like equal quota shares are protected.

The Petersburg Vessel Owners Association has a proposal that provides for similar management flexibility and suggestion for liability improvement. Proposal 190, is specifically written to address EQS with Guideline Harvest Level (GHL) guidelines. I urge the Alaska State Board of Fisheries to accept proposal 190 or generate a similar commercial red crab allocation. I have two suggestions to further the adaptive management of the proposal. First, provide for the red crab fishery to be fished in tandem with golden king crab and tanner crab fisheries in February to improve costs deficits for the industry and enforcement. Second, I would provide for a straight EQS system to ensure the fishery is managed in a careful manner, as shellfish are the most sensitive to climate change and ocean acidification.

Background

The Alaska State Legislature, Alaskan Admin Code regulation 5 AAC 34.113, “(c) The department shall close the fishery if the department's estimate of the available harvest is below the minimum threshold of 200,000 pounds of legal male red king crab” has limited the current commercial red crab fishery in Southeast Alaska for commercial fishermen.

The Petersburg Vessel Owners Association has submitted proposal 190, Proposal 190 would open the door to a red crab fishery in Southeast Alaska:

We are looking for a way to prosecute a red king crab fishery at an economic threshold lower than 200,000 pounds of legal red king crab. This minimum threshold has not been addressed in several years, while the red king crab market price has increased. The minimum threshold was first set at 300,000 pounds in 1988 and later lowered to 200,000 in 2002 by the request of the industry and processors in response to the rising value of red king crab. According to ADF&G fishery ex-vessel prices, since 2000, the statewide average price of red king crab has increased from $4.74 a pound to $9.27 in 2018. We set this regulation to sunset before the start of the 2027/2028

season to allow this fishery management plan change a trial period of two board cycles. We mirrored the Chatham and Clarence sablefish equal quota share fisheries.

Past liability issues with state allocation of equal quota shares should be addressed in the state constitution in terms of adaptive management and governance to protect the state of Alaska and the Board of Fisheries from litigation from fishermen when the equal quota shares system is implemented. Article 8 addresses sustained yield, if the State of Alaska allocates equal quota shares it should not be a liability as the federal government has a similar allocation, IFQ. Therefore, the administration of EQS should be protected under the constitution as equal quota shares level the playing field for commercial fishermen and provides better management and adaptive governance due to the delicate nature of our ocean's habitat due to ocean acidification and climate change.

Equal quota shares provide better flexibility, feedback, and are more comprehensive in terms of enforcement and management. Adaptive management methodology is complex as it is a system built to be flexible. The US Department of the Interior has shared the following key points that correlate to successful management in their technical guide, *Adaptive Management* (2009):

- Resources are described as changing through time, so as to allow learning to occur and management to adapt to learning.
- The resource system is characterized by key components of interest (for example, population, size, resource biomass, or volume, biodiversity) that are the focus of management and the targets of monitoring.
- Resource changes often are described in terms of processes (for example, reproduction, mortality, spatial movement) that are thought to be directly influenced by management.
- Fluctuating environmental conditions are incorporated as needed to characterize resource dynamics.
- Management impacts are described in terms of costs, benefits, and influences on resource components or processes that are highlighted in the model.
- Models are calibrated with available data and knowledge, to ensure compatibility, with the current understanding about resource structures and functions. (p.30)

These model attributes are typically shared in adaptive studies, as adaptive management is not a "cookie cutter" for creating effective management strategies, rather a guide for discernment. This diagram, shared by the US Department of Interior (2009) on page 15 of their *Adaptive Management Technical Guide*, introduces a system to organize the adaptive management process:

Through this process, scientists, stakeholders, and managers are able to use assessment as a tool to adjust planning. A framework to provide legal protections to the adaptive management process is necessary to protect overall governance.

Options

In regards to the Petersburg Vessel Owners Association proposal 190, I believe that it would be a better fit if the red crab fishery was set to coincide with the tanner and golden king crab fishery in February. By having the fishery in February, operational costs for industry and enforcement are streamlined.

Proposal 190 guideline harvest levels could be eliminated to become straight equal quota shares to provide for crab to be harvested in the most sustainable fashion, similar to the sable fishery in Chatham straight. I would strike both parts I and II and create an equal quota share system that would provide adaptive management of the fishery as biologists could be more frugal with their initial recommendations based on biomass:

(1) When the harvestable surplus is above 88,500 and below 99,999 pounds of legal male red king crab, vessels will be subject to a 1,500 pound trip limit and no more than 3 days of fishing per trip to allow management to close areas as the regional GHLs are reached.

(2) When the harvestable surplus is between 100,000 and 199,999 pounds of legal male red king crab, vessels will be subject to a 2,000 pound trip limit and no more than 5 days of fishing per trip to allow management to close areas as the regional GHLS are reached

Recommendations

My recommendation is to model the Southeast Alaska state red crab fishery after the state equal quota shares system utilized in Clarence and Chatham Straight. Another example of successfully similar managed plans to EQS include the federal IFQ system, which is being utilized in the federal crab fisheries of Southwestern, Alaska. I further recommend that the State of Alaska provide for liability protections when administering adaptive governance as we are one of the last remaining sustainable fisheries in the world.

In conclusion, adaptive governance can be a thoughtful driver in creating and implementing policy, "AG is not about a focus on getting the policy 'right' before acting, but rather about environmental governance that supports the emergence of policies, in a learning context, that allow for adaptation in a dynamic system" (p. 86). The flexibility to improve policy is built in as data or new information can inform and drive

policy as well as the decision making processes that derive and scaffold decisions. I ask the board to consider legal protections in management and enforcement of fisheries both commercial, sport, and subsistence, to further adaptive governance.

References

Alaska State Board of Fisheries. (2021). Proposal 190. Petersburg Vessel Association. http://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.proposalbook

Alaska State Legislature. (2021). Alaska Admin Code 5AAC 34.113. http://www.akleg.gov/basis/aac.asp#5.34.113

Ferriter, O., Williams, B., Szaro, R., and Shapiro, C. (2009). *Adaptive Management: The U.S. Department of the Interior Technical Guide.* https://www.doi.gov/sites/doi.gov/files/migrated/ppa/upload/Chapter1.pdf Washington D.C.

December 22, 2021

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

Dear Members of the Board of Fisheries,

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

I live in Juneau, Alaska, and I participate in the sport and public use salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is important to me for personal use.

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,

Tom Rutecki
rutecki@gci.net

December 19, 2021

To whom it concerns;

The following are my thoughts and comments on some of the Southeast and Yakutat Finfish and Shellfish Proposals before the Board.

*Proposal 170

I am not for this proposal. This seems too broad of a blanket. I am not necessarily against customary and traditional areas if they can be uniquely identified and shown that a special designation is needed.

*Proposals 171-174

I am against this group of proposals.

Changes to the current season schedule may result in an even more intensified fishery. Proposal 176 the author states that there are 256 current active permits. I have not verified this but it appears accurate. The average participation in the last 10 years, 2010-2019, is 103.1 permits per season. (CFEC web page participation and earnings)

If we go to a summer season, I fear that much more effort and an even shorter derby style seasons will result. It will be even more difficult for ADF&G to manage, and GHL's will likely be reduced. Even if GHL's are not reduced, the increase in effort will result in less income to those who make up the core of the fleet. When the fishery went limited entry, it was with the October opening. No one is, or has been denied the ability to commercially harvest because of the season. Gear conflicts and lost gear will also likely increase with a change of season.

*Proposals 175 and 176

I don't see the need to limit how many pots are on a string nor the amount of gear. It seems to me that this is an ADF&G issue. If they felt the need to propose this kind of further restriction to the fishery they would have.

*Proposals 177-179

I am against any further areas being closed to commercial fishing.

If the biomass is such that a closure is needed, I feel it should be up to ADF&G. They have guideline harvests for each district and manage based on actual data. If ADF&G need more control they would have such a proposal before the board.

Further, all other user groups have access to the resource all spring and summer before the commercial season. Plenty of time and access to harvest sport and personal use.

*Proposals 200, 201,204, 205, 206, 207, and 208

All of these proposals request closing and/or further restricting sport and/or commercial fishing.

I support further restrictions on non-resident sport fishing.

Lodges and charter operations harvest large amounts of the resource as is evidenced in all of the fish boxes of frozen product that leave these small towns and the state with very little regulation. Limiting the sport and charters gear and bag limit for out of state residents is reasonable.

Guides should not be allowed to take resources with clients on board. Resident guides should still have access to the resource on their own time without clients.

I don't think it is appropriate to further restrict commercial fishing. Sport and personal use participants have ample opportunity to the resource. They can harvest year-round in most areas. Before, during, and after the commercial season. Districts 1&2 aren't even open in the summer to commercial crab fishing, the commercial season opens October 1.

*Proposals 202, 203, and 211

I agree with these proposals.

I don't think it necessary to have these areas closed. As I stated above, all of the user groups have access to the resource year-round

*Proposal 214

I am opposed to this. Crab pots do not need to be circular. In fact, square pots are being marketed and sold to some of the commercial fleet at this time. Forcing some participants to change gear is extremely expensive and not necessary! Pots can cost over $250 each and that doesn't include freight.

It seems to me the issue is how to limit the size of the gear.

An alternative might be to re-word the reg. to say that a Dungeness pot cannot have a bottom perimeter of more than 157 inches. (A circular pot with a 50 inch diameter = 157.08 in perimeter) and have language similar to king and tanner pots that "the sides of the pot be perpendicular or sloping inward toward the center of the pot:

I believe similar language was in place until the last Board cycle as the old reg book read something close to this.

Thank you for your consideration.

Sincerely,

Tom Traibush

PO Box 62

Gustavus, Alaska 99826

Submitted By
Tracy Rivera
Submitted On
12/19/2021 3:01:31 PM
Affiliation

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Tenakee Springs, Alaska 99841

Dear Board Fisheries, I've lived in Alaska since I was 5, I'm 55 now. I've fished every year. I started sport fishing, then ran a charter business and now commercial power troll. Please support these proposals: 80, 82, 89, 144, 156, 157, 158. Please DO NOT support: 83, 159, 160, 161, 163, 164 ,165, and 166. Thank you for all your hard work. Sincerely, Tracy Rivera F/V Good News

Submitted By
Tracy Scherdt
Submitted On
12/22/2021 4:04:38 PM
Affiliation

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Douglas, Alaska 99824

Herring are a vital resource to our healthy habitats, native culture, Alaskan culture, and it is our duty to protect them for future generations. One of the last healthy herring runs in the world, which to me, makes it outstandingly priceless. Thank you for considering Southeast Alaskans in your regulations and political choices.

Submitted By
Tracy Sylvester
Submitted On
12/22/2021 11:51:38 AM
Affiliation
The Fisherman's Pantry

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8 Orchard St.
Woods Hole, Massachusetts 02543

I am a commercial salmon troller who has lived and fished out of Sitka for most of my adult life. My partner and I fish coho salmon with our two young kids, spending most of our time down in Southern Baranof. Since I first came to Sitka as a Fisheries Biology intern in 2007, I have witnessed an astonishing decline in the herring population. Each year it is harder for subsistence harvesters to find roe while the fishery has pushed forward year after year, despite protests and the volatile economics of the fishery in recent years.

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. Protecting the herring will benefit everyone in our community both locally in Southeast and globally, as healthy ecosystems in Alaska are vital to healing our ailing planet. Fisheries scientists and policy makers from around the world look to Alaska as a model of seafood sustianability. With these accolades comes the responsibilty to set a good example and truly consider all the impacts of our commercial fisheries on the ecosystem.

Submitted By
Trevor Rostad
Submitted On
12/22/2021 12:12:32 AM
Affiliation

My name is Trevor Rostad, from Kake, AK. I have been an Alaska resident for 31 years. I have worked in the fishing industry for over 20 years, and worked in herring seining for 7 years. I am the sole provider for my family of four; my two children are Alaska Native, as well as my spouse. Fishing is more than just a job for me, it is my way of life. The herring seining has been a great financial support for us. I am here to say I support proposals 163 and 164. I believe equal split will make a safer, more economical fishery, which will also allow ADF&G to protect the herring resource.

Submitted By
Trevor Schoening
Submitted On
12/22/2021 9:09:16 AM
Affiliation

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, and 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Thank you

UNITED FISHERMEN OF ALASKA

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E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

November 10, 2021

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

RE: Opposition Proposal 121

Dear Alaska Board of Fisheries Members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 37 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

United Fishermen of Alaska is opposed to proposal 121 which seeks to close waters to commercial drift gillnet fishing in and around Coffman Cove. Several UFA members participate in this fishery and can attest to there being no safety issues documented in this area. In fact, this proposal served as the first, and only, communication fishermen who fish the area have ever heard or received about a perceived safety issue. As well, there has not been an increase in the number of gillnetters fishing around Coffman Cove as stated in the proposal[1].

If safety is a concern for the sport fishermen and sport guides who traverse this area, communication and education can easily solve the issue. The commercial fishermen and sport fishermen share the same small harbor and see each other often as they walk the dock. Several commercial fishermen have offered to help educate sport boat operators about the visual cues and setting patterns of gillnets, and how to navigate appropriately and safely when they are actively fishing. There have been some sport boat operators who have been receptive to this open dialogue.

When a person gets behind the wheel of a motorized vehicle they are also taking on the responsibility of operating that vehicle safely. That would include other people's property. This proposal punishes the victims of unsafe vehicle operation. It is akin to killing all the deer along the highway because they are a safety hazard to driving at high rates of speed.

Currently, commercial fishermen in the area give sport fishermen a wide-berth and do not set their nets in favored sport fishing spots, staying clear of the Triplet Islands northeast of the mouth of Coffman Cove. Commercial fishermen already make accommodations and concessions to the local sport fleet, and they are always open to communicate and share the resource and region.

[1] Personal communication with ADF&G

We ask the Board of Fish to take no action on this proposal and allow the local sport and commercial fishermen to work together to solve any concerns the authors of this proposal may have.

Regards,

Matt Alward
President

UNITED FISHERMEN OF AL

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December 21, 2021

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

Re: Opposition of Herring Proposals 156, 157, and 158 that would reduce harvest rate

Dear Chair Carlson-Van Dort and Board of Fisheries members,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast. We have participated in the Board of Fisheries (BOF) process for over four decades and oppose proposals 156, 157, and 158.

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

ADF&G reviews and adjusts the data and management plans for the Sitka herring fishery as necessary and when new information becomes available. ADF&G's commitment to precise biomass estimates is further shown in their current research project to determine the maturity at age composition of the Pacific herring in Sitka Sound using scale samples.

UFA opposes Proposals 156, 157, and 158 which would reduce the current harvest rate without biological merit or justification. These proposals seek to reduce the harvest rate and harm the commercial fishing industry without providing measurable benefits to other user groups.

Sincerely,

Regards,

Matt Alward
President

Tracy Welch
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

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USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

Comments USAG SEAK Finfish Ketchikan, Alaska January 4-15, 2022

Proposal 80- Given the current king salmon situation in the region, it is unlikely that the gillnet fleet will achieve its harvest ceiling anytime soon. In 2021, when it became apparent that we would not reach our ceiling, the commissioner allocated our remaining fish to the troll fishery. Moving forward, if it becomes apparent we will not achieve our ceiling for a particular year, and it would be applied to a particular user group, it makes little difference as to where it goes, as it will just be lost value for us. In 2021 4000 king salmon were re-allocated from the gillnet fleet to the troll fleet as it was recognized gillnets wouldn't be able to catch their treaty share. That has an estimated value of $288,000. In the last twenty years 40,000 kings have been re-allocated in this fashion. It could be applied to either the seine or troll fishery and the fish could be accounted for in the Alaska annual all gear harvest. Since we rarely exceed our ceiling, and if our underage of fish is reallocated to the troll fleet, it would seem fair that any overages for penalty in payback would be endured by the troll fleet.

Proposal 81- **Neutral**- We would likely support this proposal if the troll fishery were willing to take any overages incurred in any particular year by the seine and gillnet fleets.

Proposal 96- Support- Trollers are currently below their enhanced allocation range. Enlarging the terminal harvest area may help them in their efforts to achieve that goal.

Proposal 97- Oppose- We are not opposed to the current system to allow only troll access to the outside part of the bay until June 12. This excludes the net fleets and allows the troll fleet opportunity. It should be noted that the troll fleet still has access to the rest of the bay during this time frame, throughout the times the bay is open. SSRAA set rotations for the net fleet that allowed 24 hours between the net rotations, so the troll has access to the entire THA with no other gear present every other day. Increasing the time for exclusive access denies access for the net fleets. Effort has been reportedly low for the exclusive access area for troll in the recent past seasons, likely due to poor success. There is a high participation rate in this THA by both net groups, and the exclusive access denies them opportunity to harvest high value king salmon entering the THA, which is frustrating when there is little to no effort by the troll fleet.

Proposal 98- Oppose- While we are over our enhanced allocation range, we would note the seine fleet is within theirs, mostly due to new production at Crawfish Inlet and SE Cove. Due to poor king salmon returns and pending SOC Action Plans, gillnet opportunity in common property fisheries, where we have historically accessed most of our enhanced fish, has been severely restricted in four out of our five common property management areas. Since we have no access to the aforementioned new production, THA's are becoming more important for our access for enhanced fish. Adoption of this proposal would likely get gillnets into their range, but would also likely push the seines over theirs, while causing extreme hardship for the gillnet fleet. Anita Bay THA has been closed for much of the last two seasons for cost recovery and the SSRAA board has elected to utilize all chum value for CR for all of 2022. We expect this will be continued for at least the near future.

Proposal 99- Oppose- This proposal would effectively remove gillnets from the SE Cove THA. Current regulation, adopted in 2018, allows access to the gillnet fleet at the discretion of the NRSAA board. The 2018 proposal brought forth by NRSAA, had broad support, including the proposer of this proposal. Opponents of the proposal were worried that the NRSAA board would ignore the Enhance Allocation Plan, and allow gillnet opportunity before it was deserved. The NRSAA board has proven to be diligent, and no access for gillnets has been allowed. We obviously supported the 2018 proposal since it recognized that new production should be available to all gear groups. Having time and rotations set by the NRSAA board allows fluidity in management for the THA, allowing for a year-to-year review, and access for whoever needs it more. The current regulation leaves rotations and time at the discretion of the NRSAA board, allowing the gear groups, those familiar with the nuances of the region's issues, to decide. While we are over our enhanced allocation range, the seines are in theirs, and are likely to climb higher. While it is impossible to exactly predict where the 2022 will put each net group, it is worth noting that after the 2022 season that the 2017 will fall off the five-year rolling average. It is the highest point in the current average for the gillnet, and the lowest point in the seines. If returns are similar for enhanced chums as in recent years, it is likely that seines will go over their allocation range and that gillnets will either be in their range, or at least very near their top end. New production at SE Cove, Crawfish and Port Asumcion is expected to continue the current upward trend of the seine value and downward trend of the gillnet value. Adoption of this proposal could lead to two years of seines being out of their range, and allow no opportunity for the gillnet fleet before the next SEAK BOF. The current regulation could allow limited access for the gillnet fleet, should these things fall into place. If they don't, we have every confidence that the NRSAA board will make the proper allocative decision.

Proposal 100- Oppose- This proposal will effectively remove gillnets as legal gear in the SE Cove THA. When NRSAA decided to acquire ownership of this permit, it was supported by the gillnet fleet, as it was recognized by the NRSAA board members that all gear groups should be allowed consideration in any new production. It was recognized that the location would allow for very little, if any, common property interception by the gillnet fleet, and their only access would be in the THA. Adoption of this proposal would result in the loss of a very important and accessible tool to help balance the enhanced allocation between the fleets into the future.

Proposal 101- Oppose- We are comfortable with the department's efforts to minimize straying. We are also comfortable with the on-going fitness study to identify the effects of straying on wild stocks.

Proposal 102- Oppose- Adopting this proposal would lock down the time-sharing ratio for three years, minimum. Coupled with the new production at Crawfish, SE Cove, and Port Asumcion, it would

accelerate our enhanced allocation percentage drop, and accelerate the seines going above their range. In 2018, the NRSAA board voted to move 20M summer chum eggs from the release at Deep Inlet to Gunnuck Creek hatchery in an attempt to get that project rolling. These fish are the first fish to return to Deep Inlet in any given year, and are an important component to the gillnet performance at Deep Inlet. In 2022, that component as 4-year-olds will be missing. Historically, the gillnet exploitation of the Deep Inlet return is well in our enhanced range with much of that time sharing at 2-1. Seines are above theirs, as they have the ability to intercept in common property fisheries outside the THA. These are the only NRSAA fish available to the gillnet fleet. Last season, the gillnet got a mere 14% of NRSAA production. Allowing regulation to sunset will allow a 2-1 ratio of gillnet-seine, afford gillnets some much needed opportunity to offset lost traditional time due to wild stock concerns. When fishermen voted to tax themselves 3% to fund enhanced fish, it was needed to bring stability in face of weak wild fish returns. Allowing a 2-1 ratio at Deep Inlet will bring that stability to the gillnet fleet.

Proposal 103- Oppose- We are comfortable with the department's efforts to minimize straying. We are also comfortable with the on-going fitness study to identify the effects of straying on wild stocks

Proposal 104- Support- We will always support opportunity for salmon fishing by all gear groups on returns in excess of broodstock and cost recovery needs. The ADF&G comments regarding a too constrained area to conduct a common property fishery are lost on us. The gillnet fleet operates well in constrained areas with lots of boats. It isn't always pretty, but altercations are rare and seldom accelerate beyond some yelling. Since any common property would be on SSRAA chums, a six inch minimum mesh restriction would minimize impacts on wild pinks that are in the THA, and be very effective for the target species. Conditions of permits require that all efforts be made to harvest all hatchery fish to minimize straying.

Proposal 105- Support- These king salmon were moved from Neets Bay to get them out of the Unuk River corridor, a SOC, to allow access for the troll fleet. Net fishermen had access and rotations on these fish at Neets Bay THA. Adoption of this proposal would allow opportunity for both troll and nets, maintaining what was had at Neets Bay. These Port St. Nick fish have been bid for cost recovery in the past, but the return is minimal to SSRAA, and these fish would be better suited to fleet opportunity.

Proposal 106- Support- Due to the physical characteristics of the site, gillnets will be an effective tool in harvesting these hatchery fish. Conditions of the permit for this site and best management practice require the best most efficient tools be available.

Proposal 107- Support- As stated in earlier comments, we support opportunity for all gear groups in THA's that have an excess of fish required for cost recovery needs. In this case, it will probably be a while before any net fishery can be afforded an opportunity, but it makes sense to set groundwork now that will allow THA opportunity when SSRAA becomes more financially sound.

Proposal 108- Support- All gear types should be included and used to efficiently harvest fish to fully adhere to permit conditions and best practices.

Proposal 109- Support- All gear types should be included and used to efficiently harvest fish to fully adhere to permit conditions and best practices.

Proposal 110- Oppose- This proposal is the result of an extraordinary event, where an individual lost his ability to haul a net and abandoned it. Generally, if a gillnetter loses his ability to retrieve a net, he

would haul it by hand and/or ask for assistance from other fishermen. Nets are expensive and not likely to be abandoned if they can be safely retrieved. We don't see a need to have a regulation to report lost nets simply because one person made a very poor choice. That being said, we realize that if the board wishes to go down this road, it will not be an extraordinary burden. We simply view it as unnecessary.

Proposal 111- Support- This has been a discussion item many times in our SEAK Gillnet Task Force meetings. The problem, as the proposer states, is that over time gillnet will likely stretch. The degree to which it stretches is subject to twine size, quality of gear, how it is hung, and fishing practices. If one is to purchase a 6-inch net, it will likely not be exactly 6 inches for long after it has been fished. Allowing a 6 1/8 inch maximum could keep that net legal longer. To our knowledge there has not been a lot of gear violations for the current regulation, but there could be depending on how stringent enforcement is.

Proposal 112- Support- This proposal came about through discussion with management about the frustration experienced by both fishermen and the department regarding harvest of Taku coho. Several times over the years it has been noted that there was a large coho return, and gillnet catches were low. Extended time had been given, but gillnetters would not take advantage of all of it, as success rates were low. We realize adding 50% more depth will be controversial, and that any gear modification of this magnitude should be. It would skew CPUE data, and the impacts are an unknown. That is why we asked for department discretion in any given week from stat week 34, the first week of coho management in this area. We felt there would be little impact to other user groups, as it would likely only be utilized in high abundance coho years, when there was a demonstrated large coho return. In the new PST annex there is an annual forecasted return, and an allowable catch for coho. We felt that we should have tools to allow us to harvest these fish. It is unlikely that many people will spend the money to acquire one of these nets should this proposal be adopted since it is only by department discretion, and such a net would be expensive. If someone were to, and offered that information to the department, and there was low effort with a high return apparent, the department could possibly ride along as an observer to note the catches in the deep gear and cross-reference the CPUE with a vessel fishing a standard net. If this proposal were not adopted, we would not have any tools other than time to capture these treaty fish that will be renegotiated in a few years. It's very difficult to negotiate for fish you haven't capitalized on in the past.

Proposal 117- Support- Trollers are currently below their enhanced allocation, and inefficiency has been identified as a possible reason for this.

Proposal 119- Support- This proposal would change the designation of the current seine only portion of 6-D to 6-E. The portion of district 6-D that is currently shared by seine and gillnet will retain its current designation, 6-D. This would clarify announcements for both fleets.

Proposal 120- Oppose as written- This would allow gillnet opportunity in an area that has traditionally been seine only, when other portions of district 6 are open for the gillnet fishery. We welcome a proposal that would allow expanded gillnet opportunity, especially since we are under our guideline percentages for pink and sockeye salmon per 5AAC 33.363. In years of high pink abundance after the statistical weeks covered by the MacDonald Lake Action Plan, we would support this proposal with alternative language allowing the department to give us expanded opportunity, at their discretion, when there was no conflict with seine openings in the same area, that was not tied to other portions of district 6 gillnet areas. Our interpretation of this proposal as written would require that 6-E be opened when any portion of district 6 was open. This would likely cause drastic time reduction, or closures, in

traditional district 6 fisheries, during both king salmon conservation measures, and MacDonald Lake Action Plan time frames. During the 2021 season, during pink management, most of southern southeast Alaska was open to seine, including district 6. Seine participation was pretty low in 6, as seines chose to fish other areas. There was likely an abundance of pinks available for harvest that the gillnet fleet could have had opportunity on, had the area been available.

Proposal 121- Oppose- This proposal would close a section of district 6 adjacent to the entrance of Coffman Cove to commercial gillnetting. The area in question is a well-used gillnet area that has existed since statehood. It is regularly fished during open periods. The proposer contends there is a safety issue as some vessel operators are unable to avoid gillnets that are in operation during gillnet openings.

- Gillnet ends are generally well mark with high visibility buoys, and the corkline has corks every 36-46 inches.
- Gillnets are attended by their owners constantly, who are more than willing to advise and help operators struggling to find a way past their net. Monitoring channel 16, and/or calling a gillnetter would be a good safety measure that operators could take.
- Gillnets in this area are generally ½ mile apart, and set perpendicular to the beach. Given the area description in the proposal, this would make for a maximum of 4 nets in the proposed closed area.
- Gillnets generally have a depth of around 5-6 fathoms, depending on the time of year. This would leave plenty of depth for most boats to go between the net and beach to get around a net.
- Operators of vessels are responsible for the safety of their own vessel. If gillnets are suspected to be in the area, being alert and reducing speed until a safe path is determined would do far more to reduce incidents than closing the area. Anyone who has gillnetted for any amount of time has had their net run over by another vessel.
- A better safety measure than to close area to long time users would be to post signage on the float in Coffman Cove advising caution and making un-guided and residents aware of the nets that may be present during certain days of the week, starting Sundays at 12:01, and ending at noon, usually on a Tuesday or Wednesday. The weekly gillnet announcement could also be posted, so operators could ascertain as to whether to use appropriate caution.

Oppose 122, 123

Support 124

The Hawk Inlet fishery was established in 1989, the result of a proposal brought forth by seine interests to allow harvest of high-quality pinks in high abundance years. In the board of fisheries process, it was recognized that the area was an absolute mixed stock fishery, as there were no terminal streams in the immediate area. A 15,000-sockeye cap for the month of July was instituted to allow passage of sockeye bound for the two Lynn Canal systems, Chilkoot and Chilkat, and the Taku River in Stephens Passage, recognizing the use of these fish by both the Lynn Canal and Taku gillnet fleets. With the advent of enhanced sockeye in Speel Arm by DIPAC, the 15,000 cap was changed to WILD sockeye only,

recognizing that seines should not be precluded opportunity for enhanced fish, which is in our estimation, fair.

There is a department test fishery conducted in this area every season, stat weeks 26-29. It's a great place for a test fishery. Gillnetters use it as an indicator for Lynn Canal and Stephens Passage. In good abundance years, it is a solid revenue generator for the department.

2012-2014 the department did a genetic stock composition for sockeye in Chatham straights, including 112-16, the area in question. 2012 and 2014 there was no fishery in 112-16, but samples were taken during the Hawk Inlet test fishery. There was a fishery in 2013, and there was data accumulated for stat weeks 27-35. Seines harvested 24,870 sockeye during those weeks. 34.6% or 8,601 of those fish were Chilkat fish. In addition, the 2013 data shows an inclining percentage of Chilkat composition in the seine catch, starting with 15% and ending at 68%. While we realize that the data base is small, and could possibly be characterizing an extraordinary event, it certainly is more information than was available to the BOF in 1989.

The gillnet fishery in 115 is genetically sampled and the results processed in season. This allows the department to assess sockeye stock composition for run strength for both the Chilkat and Chilkoot. It is apparent to us that if the Hawk Inlet test fishery and seine fisheries in 112-16 were genetically sampled for stock composition annually, a baseline could be built that would help in the long-term management of this mixed stock fishery. If the aforementioned fisheries were genetically sampled and processed in season, it would be a handy management tool for both the Lynn Canal and Taku managers, as well as the manager of 112.

- When the Hawk Inlet seine fishery was restored in 1989, Lynn Canal sockeye systems were producing well. Gillnet catches were at their historical high. Since then, there has been a decline in the strength of those systems. The 15000 cap has not changed.
- Since the implementation of the HI fishery, the seine fleet has increased their efficiency, within the confines of regulations associated with their gear type. There has also been significant increase in pump technology that increases the seines fleet ability to harvest more fish per day than they could in 1989.
- Since implementation of the HI fishery, there has been a very significant reduction in the seine fleet. While we recognize that this could reduce the amount of seine vessels that could participate, it also should be considered that the slices of the seines economic pie are larger.
- Gillnets are below their allocation guidelines for both pink and sockeye salmon. Adoption of proposals 122 or 123 would drive us further down, while adoption of proposal 124 would allow more passage of these species for utilization by the gillnet fleet.
- The Chilkat River has not made escapement for two years, with stringent protective management measures in district 15. If escapement goals are short one more time in the next 3 years, the Chilkat River will likely be listed as a stock of concern. Expanding a mixed-stock fishery that has a known component of these fish, the intent of proposals 122 and 123, would be reckless, and shift the burden of conservation entirely on the gillnet fleet.

- An abundance of pink salmon in district 112-16 is generally associated with high pink salmon abundance in the northern management region. The seine fishery during high abundance, generally go to a two days (39 hours) on, two days off rotation. Proposals 122 and 123 would allow for this type of regime to start earlier than what would be allowed if proposal 124, which replicates the plan adopted by the board in 1989. Given the earlier noted increase in efficiency of the seine fleet, adopting proposals 122 or 123 would effectively reallocate fish from a gear group that has and will into the foreseeable future, see drastic time and area restrictions due to wild stock concerns, to another that has had minimal impacts for conservation those same stocks. Gillnets have been the most impacted fishery for king salmon concerns. Stock of Concern status on the Chilkat and King Salmon Rivers, and consideration of the Stikine, Andrews Creek, and Taku Rivers have resulted in drastic management actions for our fleet reducing fishing time and area in four of five traditional management areas. Seines have been impacted the least of all the fleets by king salmon conservation measures, as their only impact is to not land any king salmon, basically a measure that does nothing more than remove their gear group from assessment of impacts on king salmon stocks.
- Restoring the plan implemented in 1989 represents a long-standing management plan, one that the majority of both fleets bought into. Expanding one's opportunity and decreasing another's will affect permit and fishery values for both, one positively, one negatively.
- Historical weir counts on the Chilkoot indicate a notable run compression over time, likely due to changing ocean or climate conditions. An unrestrained seine fishery at Hawk Inlet could lead to a higher percentage of these fish being caught in that fishery if they happen to be swinging by at the wrong time. This would lead to decreased catches for the gillnet fleet, and possible escapement concerns, which will lead to less gillnet opportunity.
- Gillnet is managed in 115 on abundance of Lynn Canal sockeye. Since we are constrained in low abundance years, we believe we should also be able to capitalize as much as possible in high abundance years. Proposal 124 is not asking for any more fish than what we have had in the past decades. Proposals 122 and 123 are. Both fleets have survived with the 1989 plan in effect, and will likely continue if proposal 124 is adopted.
- Department comments say they are neutral in the allocative aspects of these proposals, the department appears to support one of the proposal dates, perhaps not fully realizing that the DATE is the allocative aspect.

Proposal 135-Oppose- Since there is no limit on incidental king and coho salmon taken during fisheries that require a permit for any salmon species, there appears to be no reason to have permitted fisheries for these specific species. There are already vibrant personal use fisheries for both king and coho. Coho personal use fisheries may be conducted in salt or fresh water and have a very liberal bag limit, with no annual limit. Allowing a personal use permit specifically for kings during SOC conditions is probably not a

good idea. King salmon are already fully allocated, and personal use permits for kings would lead to possible closure or restrictions for sport/personal use fisheries that are already seeing conservation measures.

Proposal 136- Oppose- Commercial fishermen are unlikely to participate in the personal use and commercial fisheries in the same day. This would preclude a commercial fisherman from personal use fishing after a fishing period, even after the sale of their commercial catch. We don't believe this has been identified as a problem, and it could preclude Alaska residents from taking part in a fishery they've a right to.

Proposal 138- Oppose- Department comments indicate that there are small sockeye systems in the Juneau area that do not have an allowance for personal use sockeye. There are streams in 11-A that could be impacted. There is currently a Taku River personal use fishery that allows access.

Proposal 139- Oppose- We oppose this proposal as written. It would strike language describing dates when sockeye could be taken in the Taku River. The dates were likely set to minimize impacts on king salmon. We are not opposed to allowing access to salt water sockeye, but we would point out that there are more salmon than just sockeye available in salt water. In the gillnet fishery, at times our pink to sockeye ratio is quite high. To harvest the sockeye specified in the permit, a large number of pinks will also be harvested. There are plenty of pinks, and certainly retention by personal use fishermen is not a problem, but it may be more than the average household has a use for. We would hate to see pinks discarded as by-catch and have waste in the name of fair and reasonable access. We believe the river allows that fair and reasonable access, and is likely a better place to target sockeye and minimize pinks to what a person can reasonably use.

Proposal 140- Oppose- We would again point out that the proposers claim of fair and reasonable would likely pale in the context of fair and practical. We do appreciate the only allowing access during gillnet closures to avoid gear conflicts, which is important.

UNITED SOUTHEAST ALASKA GILLNETTERS

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USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

Northern Southeast Alaska King Salmon Action Plan- We are **opposed** to another cycle of an Action Plan for the Chilkat River king salmon. The Action Plan adopted in 2018 clearly states that should escapements exceed the lower bound threshold for three years, it would be lifted. That goal has been reached. We do realize that the forecast for the Chilkat is for below meeting the lower threshold bound, but we feel the department has the tools and the will to manage our fishery to keep our exploitation of these kings to a minimum. We have watched the last three seasons while they managed 115 beyond, and more restrictive, than the actual plan itself, both in time and area. Our problem with continuing with an Action Plan for this river is we see it as an impediment in reducing restrictions should recovery be evident sooner rather than later.

We are also **opposed** to designating the Taku River as a SOC. The Taku is managed according to the Pacific Salmon Treaty obligations and requirements. The governments of Canada and the United States co-manage the salmon resources for this river. If Alaska were to create an Action Plan, it would not affect the Canadian government's management strategy. For instance, with the current king salmon situation, there will not be a directed king fishery in U.S. or Canadian waters. If there is an allowable catch for sockeye, (which there will be), Canadians will likely harvest their share. Currently, when there is no AC for king salmon, Canadians will have zero retention of kings in the conduct of their sockeye fishery. There is a mortality associated with gillnet harvested kings, that will apply to the terminal harvest numbers that are used to assess run reconstruction that will be used in analyzation in run strength for state's Action Plan. Alaska can do nothing about the Canadian catch, so to compensate, Alaska may end up with stricter actions on the users they can control. An Action Plan would add another layer of oversight that would likely encumber and further complicate an already complicated management regime. We know the department has the tools and the will to reduce our harvest of these fish on the U.S. side of the border, they should be allowed to do their job in accordance with the Pacific Salmon Treaty with fluidity without the encumbrance of additional requirements.

We are **opposed** to the Stikine River and Andrew Creek King Salmon Action Plan. The Stikine River and Andrew Creek are also managed according to Pacific Salmon Treaty obligations and requirements. Every ten years, a new treaty is renegotiated. Catch performance and use by each country is examined. In 2021 there was a very small AC for the Tahltan stock, and zero for the mainstem, the two managed stocks for this river. District 8, our fishing area that abuts the Stikine River, was closed through July to protect these runs. The Canadians also had no AC for sockeye, so there was no directed fishery over there either. Escapements were realized. There is no forecast for 2022 yet. If there is an AC, while the

Canadians will be able to fish, (with all those thrown over kings), and we will likely not come close to our share due to area and time restrictions. In the Treaty arena, when the time comes to renegotiate, the U.S. team will be at a disadvantage, as it is very difficult to negotiate for fish you haven't utilized in the past. An Action Plan could put Alaska in the uncomfortable position of not allowing opportunity at treaty sockeye in years when it is evident that restrictions aren't necessary. Again the department has the ability, will, and the tools available to them to restrict our fishery to death. They should also have the ability to give us life without damaging weak stocks.

It is obvious that the issue with these king salmon in the Stikine, Taku, and Chilkat River are due to ocean survival. Whether that is due to predation by the rise of the population of the apex predators, lack of food, warm water, climate change, or invasive species is unclear. We do know that with the exception of the Taku River in 2021, that out migration tagging indicates good survival in river. There are indications that ocean conditions are becoming more favorable. While we don't know at this time whether they are favorable to king salmon, it is likely that when they do, and it could be next season, that we will see these stock rebound. It would be a shame to be stuck behind an Action Plan that would restrict all user's opportunity when restrictions could be lifted. With good in river survival apparent, meeting or exceeding the lower threshold of the escapement range should be an indicator of the systems health.

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
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December 18, 2021

Alaska Dept. of Fish & Game
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RE: Proposal 101 – 5 AAC 33.375 District 13: Silver Bay (Medvejie Creek Hatchery) Salmon Management Plan
Proposal 103 – 5 AAC 33.363. Management guidelines for allocating Southeast Alaska pink, chum, and sockeye salmon between commercial net fisheries.

Chairman Carlson-Van Dort, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments on proposals submitted to the Alaska Board of Fisheries (BOF) at the Southeast and Yakutat Finfish and Shellfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) provides the following comments **in opposition to Proposals 101 and 103**.

Proposals 101 and 103 are similar in nature to proposals 49-53 which were submitted for the board's consideration at the PWS/Upper Copper/Upper Susitna Finfish meeting on November 30, 2021. These proposals would regulate the straying of hatchery origin salmon through board action and institute reductions in hatchery production if these arbitrary stray rates cannot be met.

VFDA submitted detailed, written comments and provided oral testimony in opposition to proposals 49-53 for the PWS meeting. These can be identified as PC 248 in the meeting record. These comments explained the inappropriateness of amending regulation governing hatchery management and allocation plans by requiring hard triggers for hatchery straying. This approach is not scientifically supported, nor has it been adopted by the Alaska Department of Fish & Game, because this method fails to consider the variances of nature and the inherent traits of some salmon to stray more than others.

The Board of Fisheries rightly rejected, or took no action on Proposal 49-53 in PWS. It should be noted that the author of these proposals failed to submit any personal or record comments in support of them at the PWS meeting. In addition, the author did not attend to speak to the proposals and there was very little public support for their adoption.

VFDA supports comments from Southeast Alaska hatchery operators on these area-specific proposals. We would like to thank the Board of Fisheries for the opportunity to provide additional comment on this matter and would respectfully request **that the board reject Proposals 101 and 103**. Thank you for your consideration.

Sincerely,

Mike H. Wells
Executive Director

Submitted By
Victoria O'Connell Curran
Submitted On
12/18/2021 2:58:20 PM
Affiliation
self

Herring: Support 156, 157, 158 Oppose 159, 160, 161, 165

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

I am a retired commercial fishery biologist, having conducted research and management of Alaska groundfish for several decades. Our family makes their living commercial fishing and we know commercial fisheries are key to thriving coastal communities in Alaska. We have always fought for conservative management of the directed fisheries in which we participate. Herring supports the health of these directed commercial fisheries as well. On page 5 of The *Southeast Alaska–Yakutat Management Area Herring Fisheries Management Report, 2017–2020* published in December the Department states: "However, precaution is necessary because environmental influences can force populations to lower stock size equilibria prematurely and more frequently when there is harvest pressure, and also because the consequences of population decreases of herring are high due to their key role in the ecosystem and importance to users of the resource".

The information that these herring have a high biomass now is not counter to managing for more uncertainty, including the ominous impacts of climate change. In fact, creating a more conservative policy, for the benefit of all, is best done when stocks are not in downward decline. This is not just about herring as a commodity for the directed commercial fishery or whether this year there is enough quality roe on branches to feed locals and allow trade. Expand the lens further out. Everything in our Southeast ecosystem from seabirds, salmon, marine fish, marine mammals to people depend on healthy herring. Health is not just measured by biomass. You only have to look at the stumbles we have made (myself included) in blackcod and halibut assessment and management, both conservatively managed, to get a sense of how our understanding of fish is not omniscient. Unintentional differences in harvest rates by age create cascade effects and the importance of a genetic and age portfolio to the health of a stock has been well documented. Having a lot of small fish is not by itself an indicator of stock health. One thing that has become clear in Alaska is that when you have pressure on all ages of a species, and access to fish in all of their habitats, there is no longer a natural reserve for them and our fisheries management needs to be nearly perfect.

Sitka Sound is the last robust herring stock in Southeast out of 11 identified stocks. The Lynn Canal stock was one of the biggest stocks in Southeast supporting several directed commercial fisheries including a sac roe fishery when it collapsed in 1981 and although commercial fishing stopped there 40 years ago this stock has not recovered. We see similar warning signs in herring in British Columbia. In December 2021 Department of Fisheries and Oceans reduced the herring harvest rate to 10% to protect herring and in turn to protect wild salmon. It doesn't matter whether the failure of other Southeast stocks are due to fishery or environmental impacts – what does matter is we have one major stock left supporting our region and it is the basis of the marine food chain and a cultural keystone. Salmon, halibut, and blackcod depend on herring and they support culture, commercial fisheries and tourism economies of Southeast and beyond. Our portfolio is very limited and the stakes are exceedingly high.

This history of herring, like the history of the Lingít people reaches back thousands of years. There have been millions of generations of Pacific herring here. Your current understanding of this resource is a small snapshot, including the limited understanding of stock structure and virgin biomass. Lingít Elders tell us and recent literature demonstrates the importance of maintaining geographic and temporal diversity in order to protect spawning stock stability. **What we do not know is how diverse herring spawning stocks have been historically. But we can be certain it is currently reduced relative to historic levels.** This underscores the importance of sub-populations – small groups of herring that may spawn on individual beaches within a larger population like Sitka Sound - and the role different ages play in these subpopulations. For these reasons I do not support a directed sac roe fishery on Sitka Sound herring but I will comment in support or opposition to the proposals you have in front of you.

Support 156, 157, 158. Given the limited understanding of herring biology, genetic composition, and portfolio effects including age distributions and unknown future recruitment there are compelling arguments in support of proposals 156, 157 and 158 which would manage the stock more conservatively during times of low abundance and provide some protection to older age fish.

Oppose 159, 160, 161. For at least 3 decades Lingít people have been asking the Board for more protections for a fish that is invaluable culturally as a food and as a way of life. The core closed area that the Southeast Herring Conservation Alliance is trying to reduce through Proposal 160 is one of the few tangible protections for herring egg gathering and is already a smaller area than was originally requested. Proposal 159 would remove language requiring reasonable subsistence opportunity. Proposal 161 would require subsistence permits rather than the current harvest survey because of "the need for accurate and timely information on harvest and participation". I remind the Board that surveys are used to quantify sportfish catch and as I will detail in the following paragraph not all the fishing mortality associated with the sac roe fishery is currently quantified. Is there not a point where industry is willing to say we don't need more given the huge stakes to Lingít culture, other users and the ecosystem?

The Sitka Sound sac roe fishery cycles through large numbers of young fish to get to marketable fish and fishes throughout the extent of nearshore habitats. Department test sets caught and released over 2500 tons of herring in 2021 with test sets ranging in size for 5 t to 250 t. This was nearly 16% of the landed commercial catch. These test sets are assumed to have negligible mortality because of careful handling, however release mortality is likely compounded during these extended openings because pre-spawning and young fish may be caught and released multiple times in a season. The fishery also releases sets that are under quality and these are not attributed to fishing

mortality in the assessment but simply included in natural mortality. Certainly these set releases stress the fish, disrupt natural spawning, and may have unintended consequences particularly in light of the importance of subpopulations. Although I appreciate that test sets are necessary for the management of a sac roe fishery and that if handled carefully commercial release mortality may be minor relative to the fishery GHL, this is certainly not always so and both test sets and commercial release mortality should be estimated and accounted for as part of fishing mortality.

Oppose 165. This proposal would increase opportunity to take herring in a time when all indications are we should be more conservative in harvest. Further, increasing the area from Aspid Cape to Cape Ommaney and allowing fishing during the winter is likely to capture other herring stocks and provides no refuge for the fish that do return to Sitka, compounding issues with portfolio effects.

Regarding Proposal 166 there are some big questions about the intent of the proposal. Open pounds are certainly a preferable commercial harvest gear than sac roe seine but what isn't clear is if permit holders with equal quota share would be required to choose to fish either sac roe or open pound but not both within a season. I do not support the idea that the department would estimate the number of herring that spawned in the pound and deduct some fraction of that to apply towards the equal quota share allowing a permit holder to fish both gears. This proposal is only a more conservative way to manage the fishery if the permit holders stop seining and the proposal seems to be allowing a fishery to add an additional fishery under their limited entry permit. Seems possible that in combination with the sac roe fishery, pounds could restrict subsistence gathering particularly in years where spawn in the core area is minimal. How would the Department be able to ensure subsistence needs were being met if both seining and open pounds were being fished? Perhaps putting a moratorium on the sac roe fishery while considering other approaches is in order.

Please reflect on the potential for missteps, even with the good work of the Department, and implement more protective measures. The Department may have a strong assessment and management model for Sitka Sound but that doesn't mean the stock is protected from collapse. Herring biology, ecological impacts and critical cultural needs clearly require a different approach than status quo. Sac roe herring is low value and management costs are extremely high. As evidenced by the lack of the directed fishery in 2019 and 2020, and the uncaught quota in 2021 the sac roe fishery can survive under a more conservative annual quota. Please support 156, 157, 158 or consider additional management measures you can take to buffer this critical resource from unintended consequences. Reject proposals 159, 160, and 161, 165.

In closing please do not provide increased opportunity for more commercial herring harvest but rather find meaningful ways to reduce GHL to help buffer against uncertainty. Think about what has happened with herring throughout SE and what is happening in BC and reflect on the immortal words of Joni Mitchell "you don't know what you've got till it's gone".

Thank you for your consideration.

Groundfish: Oppose Proposal 225

Dear Chairman and Board Members,

I have lived in Sitka for 40 years. I am a retired groundfish biologist and have also commercially fished sablefish. This proposal asks for anglers to have a large increase in their sablefish bag/annual limit region-wide tied to biomass in NSEI but no commensurate decline in bag/annual limits when sablefish biomass decreases. This is not biomass-based and I do not support it. The BOF passed sablefish bag and annual limits in the spring of 2009. They first imposed a 2 fish limit then one month later increased this limit to 4 fish. The 2008 NSEI commercial GHL was 1.5 million pounds. This proposal arbitrarily uses a 1 million pound NSEI GHL baseline for increasing sport bag limits to 5 fish and then increasing again for each 100,000 pound GHL increase, effectively increasing bag limits and nonresident annual limits 50% this year even though the NSEI GHL has not increased since the bag limits were first implemented. In fact the NSEI GHL for sablefish, is only now equivalent to where it was when bag limits were first set, having decreased 58% between 2008 and 2016 (Figure 1). The 2021 NSEI GHL is a 24% decrease from where it was when bag limits were implemented and it is only one quarter of of the 4.8 million pound GHL in place when equal quota shares were implemented for conservation. Spawning stock biomass remains historically low and much of the population are not fully sexually mature. Sablefish live to be nearly 100 years old and must be managed conservatively. In 2021 ADFG implemented an additional conservation measure by limiting any annual increase of commercial GHL to no more than 15%.

Conversely, sport fish angler catch of sablefish has increased nearly 500% since the bag and annual limits were established and the catch is 96% nonresident (Figure 2). The legalization of electric reels for sport fishing has contributed to this huge increase in catch. All things being equal, the increase in sport fish sablefish catch expected with a change from 4 fish to 6 fish bag limit is an 30% increase of catch on average and as high as a 36% increase. This is more than twice the allowable percent annual increase afforded the commercial fleet. The sport fish harvest is deducted from the ABC before the commercial GHL is set, in practice giving sport anglers priority over the 100 year old directed commercial fishery for sablefish in NSEI. There is no limit on nonresident anglers (charter and unguided) and cruise ship tourism is exploding in SE in 2022 so an increase in bag and annual limits will see much greater than the 30% increase expected if angler numbers were static.

The current 4 fish bag limit and 8 fish nonresident annual limit provides considerable recreational opportunity for anglers. The total combined saltwater bag limit for nonresidents is at least 42 fish, sometimes more. Because electric reels are legal gear, in increasing the sablefish bag limit you will be increasing pressure on slope rockfish which has a 1 fish bag limit. There is no way that shortraker and rougheye taken at great depths will survive release.

In spite of this, if the BOF does consider changing bag and/or annual limits for sablefish please be sure they move both up and down with the baseline 2009 GHL and on a more reasonable change: 500,000 pounds.

In summary I do not support an increase in bag/annual limits for sablefish at this time anticipating a large increase in angler numbers and a NSEI sablefish stock that is still well below historic levels.

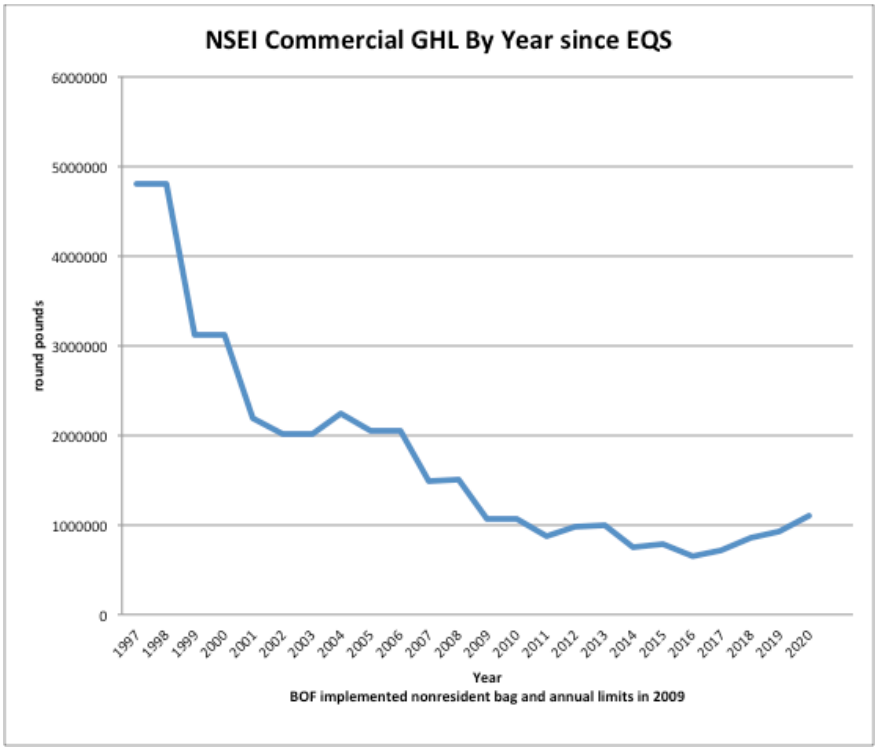

Figure 1. NSEI Commercial GHL for sablefish by year since EQS

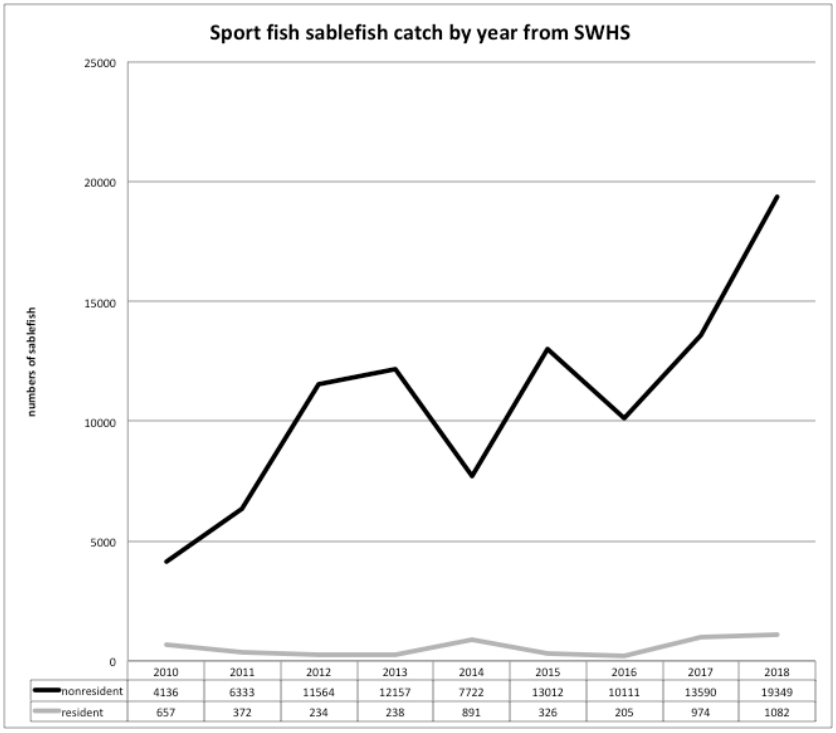

Figure 2. SE sportfish sablefish catch by year and resident status

Thank you,
Victoria Curran

Submitted By
Vlctoria Curran
Submitted On
12/22/2021 12:16:51 PM
Affiliation
self

Support 146, 147, 148

Dear Chairman and Board Members,

I support these proposals. They would set nonresident bag and possession limits of 5 and 10 for sockeye, chum, and pink salmon in fresh and salt water of Southeast Alaska. Nonresident angler pressure is on a upward trajectory and it is reasonable to put r bag and posession limits that provide recreational opportunity but attempt to slow total harvest from this sector, giving some protection to tribal citizens, subsistence fishing and personal use fisheries.

Also, the Department should be neutral on these proposals, not opposed as stated in staff comments. This is an allocation issue for the BOF to decide. It is really, really inappropriate for the Sport Fish Division to state they do not support reductions in bag or possession limits unless there is a "conservation" concern. No where is nonresident sportfish harvest given a priority over other users. There may not be an immediate "conservation" emergency but there are indications that coho ocean survival has been low and sockeye is such a critically important food for tribal citizens these limits for nonresidents put some value on that use. We all know nonresident angler pressure will continue to increase.

Thank you.

Submitted By
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Submitted On
12/17/2021 2:33:38 AM
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I am in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
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12/22/2021 6:11:25 PM
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My comment is in defense of the minuscial herring stock diminished historically from all S.E. waters to only Sitka waters today. Glutttonious harvests of herring stocks BEFORE they lay the next generation of herring is NOT "sustained yield". It is instead against nature and should be deemed immoral management.

Submitted By
Wendy Alderson
Submitted On
12/22/2021 11:37:21 AM
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Southeast Cycle-Finfish Proposal 83

Dear members of the board,

My husband and I are Sitka residents and commercial salmon trollers. We strongly oppose Proposal 83. There is no limited entry on the charter fleet and both the guided and unguided sectors are growing. We here in Sitka are looking at a record number of visitors for 2022, with numbers projected to increase. Many of these (mostly non-resident) visitors will be engaged in some form of guided or unguided King Salmon harvest. Without some kind of limited entry a fixed bag limit is a useless method of controling guided and unguided sport harvest.

The list of SEAK King Salmon stocks of concern is growing and it looks like all sectors are going to have to deal with less abundance. Moving away from the 80/20 split adopted in1992 and back towards a bag limit for an unidentified, rapidly increasing number of sport harvesters is a resource reallocation and is directly counterproductive to conservation.

Thank you for your time,

Wendy Alderson

F/V Ocean Cape

Submitted By
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12/21/2021 8:24:33 PM
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I support Proposals 156, 157 and 158, and oppose 159, 160, 161, 163, 164 and 165.

Water is life. Herring bring us the natural abundance of the oceans, but we threaten the balance of this ecosystem by being careless and misguided by money and ego. We must take a step back and let nature guide us. In order to do that we must learn the delicate balance between harvesting and allowing nature to breathe. Nature doesn't breathe minute to minute, or year to year. Nature breathes in decades, over lifetimes. Let the yaaw live.

Submitted By
Woody Cyr
Submitted On
12/22/2021 4:01:28 PM
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FV Patience

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Hi, I'm Woody Cyr. I troll, gillnet ,and longline on my boat Patience out of Sitka, hold a BS in Aquatics and fisheries from SUNY-ESF, and occupy the trapping seat on the Sitka AC. Below are my comments on this cycle of proposals.

P80: Support. Overages should be reconciled by the gear group that caused the overage.

P81: Support. We need to be harvesting our allocaiton under the treaty.

P82: Support.

P83: Oppose. This is a Trojan Horse, reallocation proposal that is nebulous enough to screw trollers out of more kings long term.

P87: Support for discussion.These approaches are the type of thing we need to enact for better managment while we rebuild the stocks.

P89: Oppose. 6 lines region wide has a dispropotionate benifit for top teir producers and may create a barier to fishery entry in what is currently one of the very few reasonably priced options.

P90: Support.

P91: Oppose. Any reductions in king harvest in August will have significant negative impacts on my business.

P92: Support. There are days trolling terminal areas in spring where 1/3 of my catch is those 3yr old mature male kings between 26 and 28". These are fish produced for troll harvest and we should be maximizing retention opportunity. Additionally, Tad and the Sitka AC have proposed an amendment with spectacular reasoning to vastly improve the current scenario and I support that whole heartedly.

P93: Support. The meat from 3 king salmon is more than enough to cover the needs of a non resident for a year.

P94: Support. The sport sector needs to get up to speed with acurate, timely data and in season management.

P95: Support. In season management IS GOOD MANAGEMENT!

P100: Oppose. Having gillnet as a legal gear leaves all the tools available in the box. This area thus far is inconducive to consistent effective troll chum harvest but is close to traditional gillnet areas.

P101: Oppose. The proposor has it out for hatcheries and would bankrupt NSRAA.

P102: Oppose. Local net group fleet members support a 1:1 ratio as the best working, most reasonable option for the Deep Inlet THA.

P103: Oppose. See 101 comment. Hatchery produciton is integral to commercail fisheries success in SE.

P110: Support. Responsible gear recovery should be mandatory. It is unfathomable to me that someone would not make every reasonable attempt to recover such an expensive piece of gear.

P111: Support. I feel this has been an issue of management and enforcement not having necessary real world knowledge and experience in the fishery. A 6" reg with some leeway is just good common sense and will not result in a different harvest outcome for SOC kings.

P112: Support. We should be fishing to our allocation.

P113: Oppose. I am skeptical if the proposor understands how the fishery and mesh restrictions work in these districts, and what size mesh is effective for catching vs avoiding kings???

P114: Support. Remove unnecessary limitations.

P115: Support. Gaining a little bit of time back for king fishing when prices are high makes a big difference for small, local boats.

P116: Oppose.

P117: Oppose. Chum trollers with far greater knowledge than myself believe this to be counterproductive.

P118: Support. Simplifying when it makes good sense is a positive change.

P119: Support for clarity.

P121: Oppose. Vessel oporators need to be aware, communicate effectively with others, and avoid hazards. Closing areas to commercial gear because of others' shortcomings is wrong and a poor precident to set. It is not that hard to go around the end of a net, figure it out.....

P122: Support for the status quo.

P131: Support

P132: Oppose. This proposal has a whole lot of "get off my lawn" intent. Quit blaming others for when you don't catch and figure out how to work together and have some courtesy for each other. Many times spearfishermen are cleaning up ghost dipnets (that continue to fish) from folks loosing their gear fishing at the falls. As written the proposal would make it illegal to slide off the rocks and become submerged in the water while dipnetting or dive down to retrieve the gear you lost.

During AC discussion it was determined that spearfishing is not legal at redoubt BUT the department and enfourcement have been leading users to believe it has been legal so much so that many individuals have been participating in the practice at this location for OVER A DECADE and thus has become a common and acceptable method. It's a big old mess..... Please rectify the current incongruent paradigm to formally allow spearfishing. I personally do not particiate in spearfishing.

P133: I don"t care what exactly is or isn't allowed for gear in this proposal but please just make this more straightforward and less of a confusing mess.

P134: Support. Shouldn't be allowed to cork off a whole channel, bad management.

P136: Opposed. Unnecessary.

P143: Support whole heartedly. It is far past due to collect some accurate sportfish data and the growing bare boat rentals will need to be addressed. I have had nobody visit who would be unwilling or offput by being required to submit this information to the department.

P144: Support. This is an up and comming significant issue that needs to be addressed ASAP. Something needs to actually happen here, not just beat around the bush...

P145: Support. Current regs allow for far higher take than participants will reasonably use in a year.

P147: Support.

P148: Support. All salmon are vulnerable to legal agressive harvest via hook and line in flowing water where snagging is illegal even if those fish will not bite.

P151: Support local subsistence priority.

P153: Support protecting vulnerable spawners to abuse.

P154: Oppose.

P155: Support the proposal as ammended by Sitka AC. We need to do everything we can to limit uninteded mortality.

P156-158: Support. Herring is a keystone forage fish species with important local cultural uses. The stock is too dynamic and complex to model acurately enough to achieve an acceptable level of impact and risk from exploitation in the commercail fishery. Any step towards leaving more herriing alive in the water is a good thing.

P159-160: Opposed, see previous reason.

P161: Opposed. The current data collection method is more than adequite and is culturally respectful.

P162: Support. Subsistence needs are not being met.

P163: Support.

p165: Oppose. It is a grab to maximize a harvest that has been market depressed of a keystone species.

P166: Support. Killing all these herring just for 13% of their mass is absurd, let's enable some fishermen to figure a way to fill a high end market while leaving more herring alive in the water.

P172: Support. Use some modern information to help the resource and fishery.

P173: Oppose. As a combo fisherman, the time in May is very valuable when making a change like this.

P185-186: Support.

P199: Support, good common sense change.

P201: Oppose. This would have significant negative impact to local crabbers. There is plenty of room for the sport guys, and already plenty of area closed to commercial near town.

P211-213: Support.

P216: Support.

P218: Support, good common sense management.

P220: Support. The sperm whales get up inside too, the pot option is a good 1 to have.

P221: Support effective gear.

P223-224: Support

P225: Oppose

P229: Oppose liberalizing regs for nonresidents.

P230: Support, we should be able to catch and eat a rockfish for dinner now and then.

P231: Support the lenght recording.

P277: Support getting good data on the bare boat rentals as they are an emerging issue.

Submitted By
Yolanda Fulmer
Submitted On
11/16/2021 8:19:34 PM
Affiliation

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My name is Yolanda Fulmer and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast. It is imperative we, as Indigenous People of Alaska, have our voices heard and supported. As the Traditional Stewards of this beautiful Land, our inherent knowledge is critical to maintain sustainability and health of the ecosystem that depends on our actions to thrive. We need to protect the herring for our own regions as well as connected regions. It is our responsibility to ensure the survival of Washington States critically endangered orcas as well. Our orcas depend upon Columbia River chinook salmon that rear in Southeast whose main food source is SE Alaskan herring. Please prioritize protecting the herring for the future wellbeing of all the honored beings under our watch.

Submitted By
Zach LaPerriere
Submitted On
12/14/2021 9:00:40 PM
Affiliation

December 14, 2021

Thank you for your service and for taking my comments.

I am writing regarding the commercial herring quota allocations in Southeast, with specific concerns as a Sitkan of over 20 years.

The current favoritism in allocation to the sac roe fishery is unacceptable. **I call for a complete morratorium on all commercial harvest of herring within Southeast Alaska for five years**, subject to an independant scientific study that examines the collapse of herring fisheries all up and down the coast.

As a board member, my guess is that you're rolling your eyes. You probably think science is taking care of the resource.

I implore you to consider that science has led us down a perilous path. I grew up in Ketchikan, and watched the glory days of the Kah Shakes fisheries in the 80s where brand new 18 year old captains made as much as $50,000 in a single year at Kah Shakes. By the time I was a teenager, many of these boats sat tied to the dock growing seaweed and barnacles. The fishery STILL hasn't bounced back, more than 30 years later.

Elders as well as a good number of fisherman on the docks in Ketchikan said the science was flawed and the fisheries was headed for a collapse. Were these concerned citizens listened to?

Of course not. Science was paraded as understanding the resource.

Science today has advanced, but it ain't perfect. Science can't tell us why native folks who have fished Sitka Sound for over 10,000 years are having such a difficult time getting their roe on branches.

Science tells us that a king salmon's diet is roughly half herring, and yet I have heard no explanation why king salmon average size is consistently going down yearly. I knew old timers who filled their boats on the Fairweather Ground with 24 pound average kings. That's huge!

My first king opening on the Fairweather Grounds almost 20 years ago had an 18 pound average, which still seemed pretty damn big.

I don't commercial troll anymore, but friends have returned in recent years from the Fairweather Grounds with an average king size of 12 pounds. Those are some sadly skinny fish, not what a restaurant or my barbeque wants.

The science is parading the Sitka commercial herring fishery as sustainable, but I have yet to hear a sound explanation for why we recently had a return of over 75% 3 year old herring. The older age classes had pretty much disappeared.

I have lived on the beach south of Sitka for over 20 years. Elders here talk about thick spawn every year. They tell stories of their grandparents telling them the spawn was even thicker before commercial fisheries started in Chatham Strait and Sitka Sound.

I have seen one fairly heavy spawn year here in more than 20 years. The following year a massive seine fishery happened right in front of my house. It took a tender well over 12 hours pf pumping to empty a single net just yards from my family's beach. There were several other big sets in our small bay that year.

It's now been over a decade since any sizeable spawn has happened in this bay. I have, however, heard aerial surveys identify spawn in recent years here in Thimbleberry Bay. I keep a skiff right out front, and I routinely commute in my skiff. One day the aerial survey identified 3/4 of a mile of spawn in Thimbleberry Bay. Well...it was visible in a skiff for under an hour.

There are so many other examples, but I'll cut to my point:

The time for proceeding conservatively is **way** past due.

I know fisherman have loans, payments, crews, and processors are counting on the next herring to come in. But what is the point in repeating history yet again by completely ruining Sitka's herring run? When the fishery collapses the permits will be worthless, subsistence will be completely ruined, and the ecosystem will loose yet more herring.

Fred Heigel said: "The only **thing we learn from history** is that we **learn** nothing from **history**."

I implore you to wake up. Listen to the elders. Put the commercial herring fishery on hold for a minimum of five years. It won't be popular. But it's **the right thing to do.**

Respectfully,
Zach LaPerriere
Thimbleberry Bay,
Sitka, Alaska

Submitted By
Zachary Olson
Submitted On
12/16/2021 12:47:16 PM
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Power Troll permit holder

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I Zach Olson a SE Alaska troll permit holder strongly oppose Prop 101 as harmful to my business and the economic viability of my community.