

On-Time Public Comment List (submitted by 12/22/21)

Alaska Board of Fisheries Southeast and Yakutat Finfish and Shellfish

Anchorage, March 10-22

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| Zach Olson | PC377 |

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



PC001
1 of 1

Phone
9715990398
Email
aani.biorka@gmail.com
Address
110 Rands Dr
Sitka, Alaska 99835

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

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

Submitted By
Aaron Brakel
Submitted On
12/22/2021 4:04:40 PM
Affiliation



PC002
1 of 2

Phone
9073214393
Email
aaronbrakel@gmail.com
Address
309 D St.
Douglas, Alaska 99824

Thank you for taking the time to consider my comments on the herring proposals before the 2021/2022 Alaska Board of Fish meeting cycle. I support the proposals by the Sitka Tribe of Alaska and oppose the other proposals.

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

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

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

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

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

With abundance in mind,

Aaron Brakel

Proposals:

Proposal 156

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

Proposal 157

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

Proposal 158

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

Proposal 159

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

Proposal 160

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

Proposal 161

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



PC002
2 of 2

Proposal 163

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

Proposal 164

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

Proposal 165

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

Proposal 166

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

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



PC003
1 of 1

Hi,

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

Aashish S

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



PC004
1 of 1

Phone
631-271-5774
Email
abbyparis@aol.com
Address
15 Eleanor Pl
Huntington, New York 11743

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

Sincerely,

Abby Pariser

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



PC005
1 of 1

Phone
6026619334
Email
amtwyman@gmail.com
Address
P.O. Box 902
Craig, Alaska 99921

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

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

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

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

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

Abby Twyman

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



PC006
1 of 1

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

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

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

Submitted By
Adrienne Wilber
Submitted On
12/21/2021 1:08:48 PM
Affiliation



PC007
1 of 1

Phone
+19077389995
Email
adrienne.wilber@gmail.com
Address
907 738 9995
Sitka, Alaska 99835

I support proposals 156 157 158, I do not support 159, 160, 161, 163, 164, 165, 166. Please prioritize herring population resilience for the long run, and the sustainable roe on branches subsistence harvest.

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

Phone
206 271 2001

Email
Glitteronthewetstreet@gmail.com

Address
7201 linden ave n
100
Seattle , Washington 98103

I support 156,157,158



PC008
1 of 1

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



PC009
1 of 1

Re: King salmon management proposals 82 and 83

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

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

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

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

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

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

Sincerely,

Capt. Alan Corbett



Board of Fish

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

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

Attention Board of Fish Members,

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

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

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

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

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

Thank you.

Alan Reeves

F/V Chopaka

907-874-3619



Board of Fish

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

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

Attention Board Members,

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

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

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

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

Thank you.

Alan Reeves

F/V Chopaka

907-874-3619



Board of Fish

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

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

Attention Board Members,

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

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

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

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

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

Thank you.

Alan Reeves

F/V Chopaka

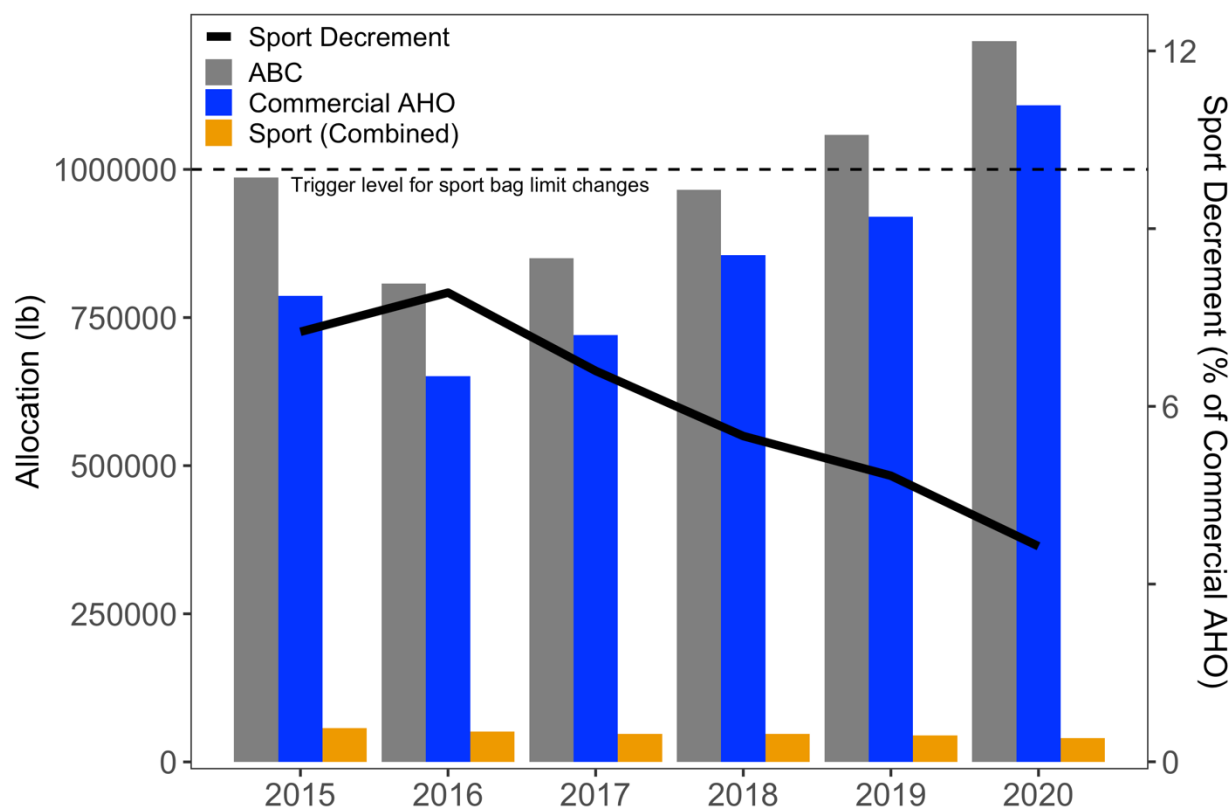
907-874-3619

SUPPORT

Proposal 225 – Alaska Charter Association, Richard Yamada

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

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



Comment

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

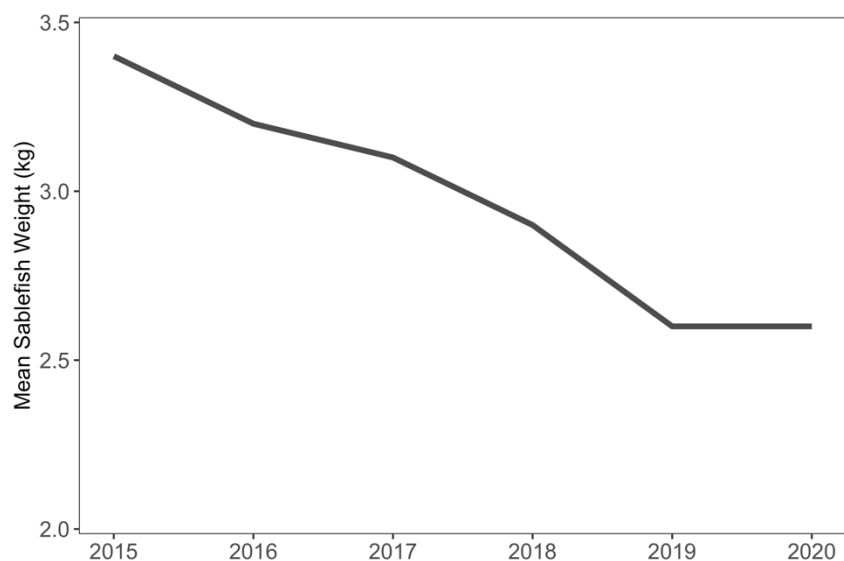
The change of sport bag limits from 4 daily and 8 annual (currently in effect) to 6 daily and 12 annual would help return the sport fishery back to its historic share of the



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

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

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





PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION



PC012
1 of 3

December 16, 2021

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

Via email: dfg.bof.comments@alaska.gov

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

Chairman Carlson-Van Dort and Board Members:

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

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

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

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

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



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

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

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

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

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



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

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

Thank you for the opportunity to comment.

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

Chris Barrows

President

Pacific Seafood Processors Association

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

Julie Decker

Executive Director

Alaska Fisheries Development Foundation



Alaska Longline FISHERMEN'S ASSOCIATION

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

December 20, 2021

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

Dear Members of the Board,

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

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

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

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

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

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

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

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

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

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

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

(2) when wild stock management measures are unnecessary:

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

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

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

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

ALFA offers the following rationale for the two requested amendments:

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

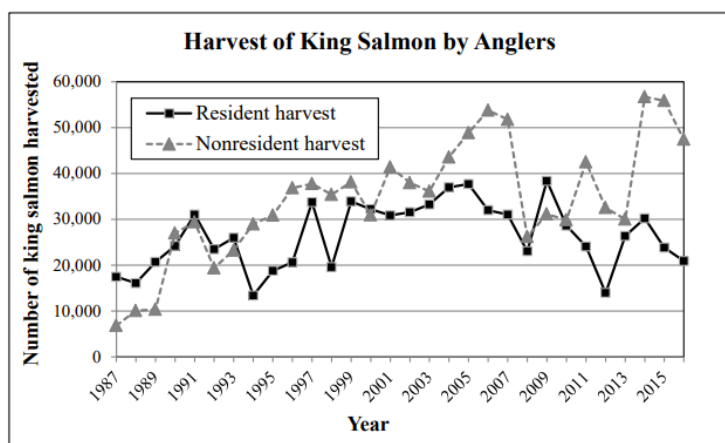


Figure 6 from ADF&G's Special Publication No. 17-15 *Overview of the Sport Fisheries for King Salmon in Southeast Alaska Through 2017: A Report to the Alaska Board of Fisheries* by Robert Chadwick et al. Note that resident harvest has been between 20,000 to 35,000 since the late 1980s, while the non-resident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



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

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

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

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

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

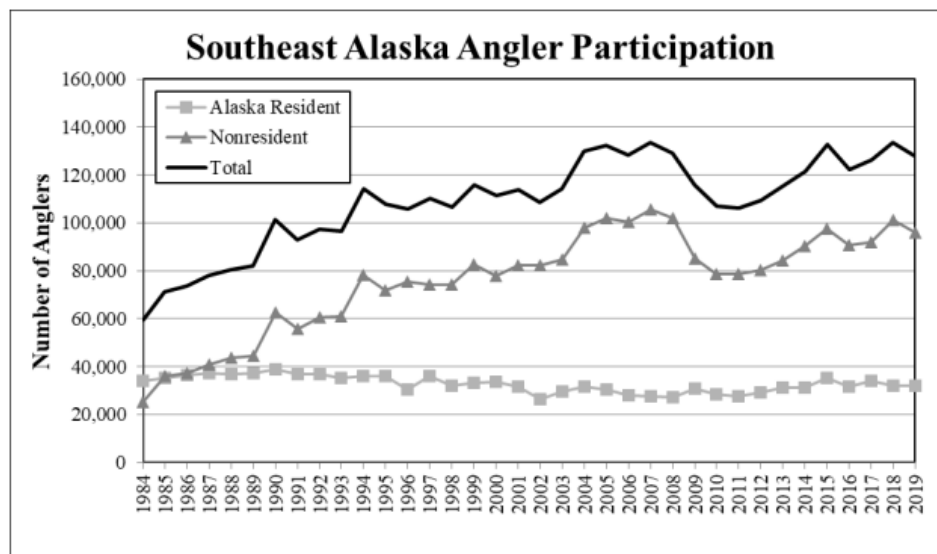
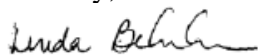


Figure 3 from ADF&G sportfish division's Special Publication No. 21-10 Overview of the Sport Fishery for King Salmon in the Southeast Alaska through 2020: A report to the Alaska Board of Fisheries by Patrick Fowler et al. Note that the number of non-resident anglers has increased steadily excepting the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

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

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
Executive Director



Alaska Longline

FISHERMEN'S ASSOCIATION

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

December 20, 2021

Alaska Board of Fisheries: Southeast Cycle

Groundfish: Oppose Proposal 225

Dear Chairman and Board Members:

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

Northern Southeast Inside: Sablefish

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

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



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

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

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

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

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

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



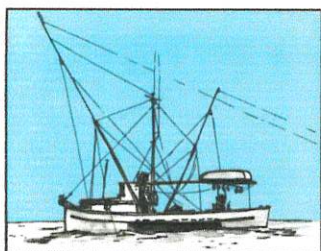
possession and annual limits were initially set. Third, the dramatic increase in nonresident sablefish harvest suggests ample opportunity is afforded for nonresident harvest, hence there is no legitimate rationale for reallocating sablefish from Alaska's hard working commercial fishermen to nonresident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

Thank you for the opportunity to comment.

Sincerely,

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

Linda Behnken
(Executive Director, ALFA)



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

December 17, 2021

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

RE: **Proposal 115**

Dear Alaska Board of Fisheries Members,

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

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

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

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

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



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

Note the chart below:

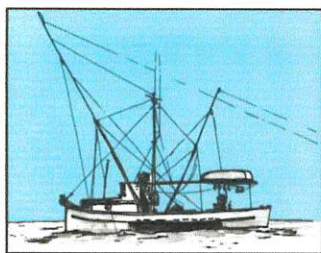
| Fishing year (Chinook accounting year) | SEAK CPUE | CPUE Quota Red=over Post Quota. Blue=under | Post season AI | Post quota | October 11 fell on Day and Week | Current ADF&G October 11 opening: Days fished Week 41- 48 | Proposal 115: Days fished Week 41-48 |
|---|-----------|--|-----------------------|------------|--|---|---|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

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

Your consideration of this proposal is appreciated.

Sincerely,

Amy Daugherty
Executive Director



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

December 18, 2021

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

Re: **Proposal 92**

Dear Board of Fisheries Members:

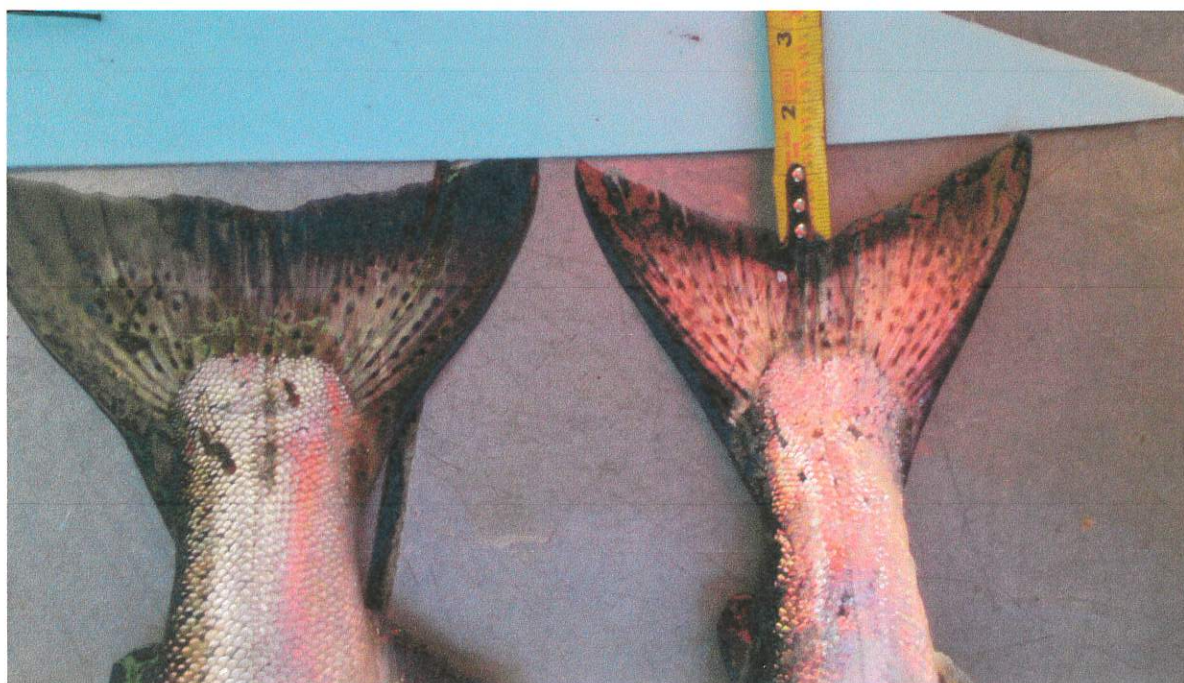
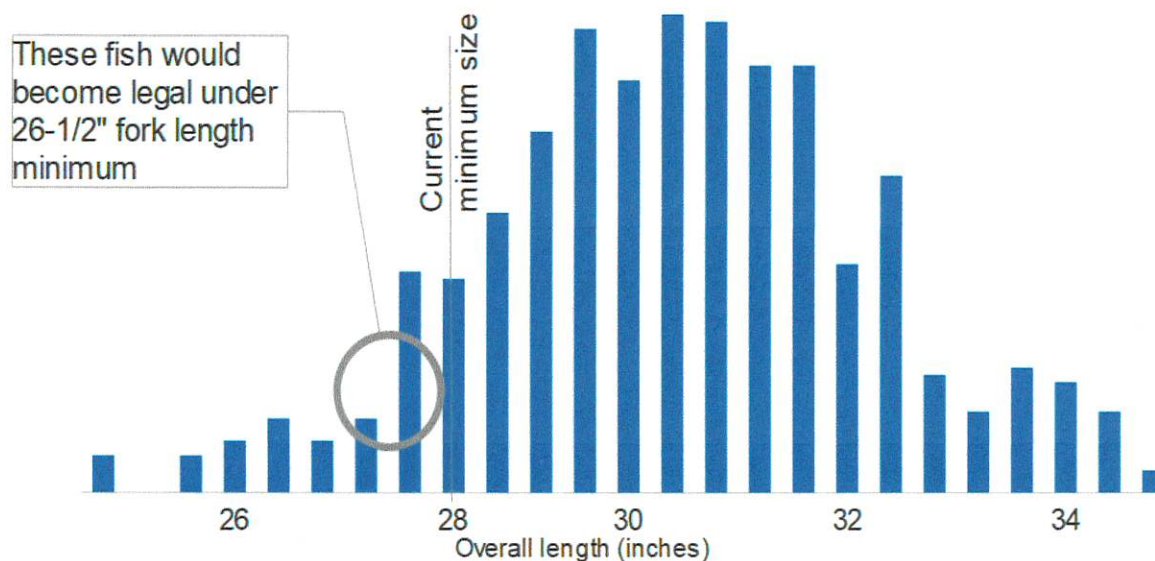
Alaska Trollers Association (ATA) represents the power trollers and hand trollers who fish throughout the waters of Southeast Alaska up to and including Yakutat. Since we have a very high percentage of Alaska resident fishermen, we are a significant proportion of the SE Alaska community economies. Our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

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

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

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

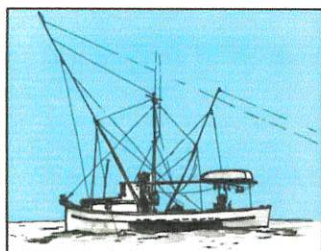
Length Distribution of 2-ocean Chinook 2015-2020 SE Purse Seine THA fisheries only



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

Sincerely,

Amy Daugherty
Executive Director



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

December 21, 2021

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

Re: **Overview of SEAK Proposals**

Dear Board of Fisheries Members:

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

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



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



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



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

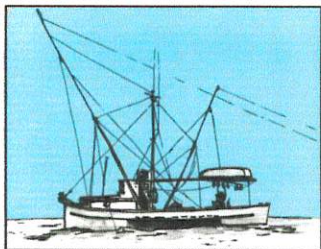


| | | | | | |
|-----|-------------------------|---|--------------|--|--|
| 125 | SE Subsistence Advisory | Allows incidental taking of king and coho from Taku & Stikine for subsistence | ATA opposes | These two rivers are about to be deemed SOC so the timing is horrible. | Brings forth the question of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

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

Sincerely,

Amy Daugherty
Executive Director



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

December 22, 2021

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

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

Dear Alaska Board of Fisheries Members,

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

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

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

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



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

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

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

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

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

Sincerely,

Amy Daugherty
Executive Director



Aleutian Pribilof Island Community Development Associat

302 Gold Street, Suite 202 | Juneau, Alaska 99801 | Phone: (907) 586-0161 | Fax: (907) 586-0165

717 K Street | Anchorage, Alaska 99501 | (907) 929-5273 | Fax: (907) 929-5275 | www.apicda.com

December 22, 2021

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

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

RE: Request to Reschedule Proposal 282

Dear Mr. Haight,

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

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

We appreciate your consideration.

Sincerely,

Angel Drobica
Fisheries and Government Affairs Director

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



PC016
1 of 1

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

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

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

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

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

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

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



PC017
1 of 1

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

Dear Southeast Alaska ADF&G Board of Fisheries,

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

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

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

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

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

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

Thank you.

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



PC018
1 of 1

Hello,

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

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



PC019
1 of 1

Phone
4257734166
Email
Alison_penny@ymail.com
Address
23502 Edmonds way
B305
Edmonds , Washington 98026

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

I support proposals 156, 157, and 158.

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

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



PC020
1 of 1

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

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

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

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



PC021
1 of 1

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

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



PC022
1 of 1

Phone
6306180035
Email
andrewchione@yahoo.com
Address
901 Southwest Blvd
Coos Bay, Oregon 97420

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

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



PC023
1 of 2

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

To State Board of Fish & Game

From: Sitka Dungeness Crabbing Community

RE: Proposal 201

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

Why is Proposal 201 so devastating?

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

- 1) The area proposed for closure is an area where entry level crabbers have a better opportunity for success. We have young fishermen getting started and the areas of Deep Bay and Baby Bear are very protected, safer to run gear and closer to Sitka.
- 2) Displacement of local crabbers will push more gear into Hoonah Sound, Peril Strait and Chatham. This Hoonah Sound/Peril Strait area is small enough and adding 200-400 more crab pots is a recipe for conflict, lost gear and, of course, lost income.
- 3) Directly affects the entire southeast crab fishery when deciding length of season. Losing this prime area will decrease the total amount of crab caught in the first two weeks of the summer season which is used for deciding the length of the season.
- 4) This is a direct allocation grab. There are no conservation concerns with Dungeness crab stocks by ADF&G. Currently, Sitka has a large area much closer to our community that is closed during the summer for recreational crabbers. This area provides opportunities for recreational crabbers just like other areas around southeast Alaska communities.
- 5) The process by which Proposal 201 was introduced and supported by the Sitka AC was flawed. There was absolutely no contact or attempt to contact any of the local crabbers that are directly affected by Proposal 201.

Therefore, we ask that Proposal 201 not be approved and voted down.

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

Sincerely,

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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



PC024
1 of 1

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

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

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



PC025
1 of 1

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

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

One has not responded.

One does not support it.

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

Fourty one supported the proposal.

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

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

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

Thank you

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



PC026
1 of 1

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

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



PC027
1 of 2

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

Dear Alaska Board of Fisheries,

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

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

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

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

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

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

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

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

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

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



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



PC028
1 of 1

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

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

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

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



PC029
1 of 1

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

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



PC030
1 of 1

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

I support proposals 156, 157, and 158.

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

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

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

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

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

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



PC031
1 of 1

Phone
9736506469
Email
aries200@optonline.net
Address
33 Sweetwater Lane
RINGWOOD, New Jersey 07456

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

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

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



Via email
December 22, 2021

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

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

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

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

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

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

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



Letter Request to Reschedule Proposal 282
December 22, 2021

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

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

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

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

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



Letter Request to Reschedule Proposal 282

December 22, 2021

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

| 2019 | |
|-------------------------|-----------|
| Permit holder | C FEC ID |
| ALFIERI, MICHAEL JR. | 425 |
| ARBELOVSKY, STACY | 201502 |
| BARNETT, ROBERT M. | 550462 |
| BENDIXEN, CRAIG H. | 77370 |
| BOUSLEY, TROY | 732051 |
| BROWN, PATRICK J. | 715813 |
| CUMBERLIDGE, DANNY | 835219 |
| DEERING, BRAD W. | 930990 |
| EASTLICK, RICHARD E. | 696280 |
| EUBANK, DONALD E. | 86660 |
| FOSTER, ANDREW R. | 193461 |
| FOSTER, BRUCE JR. | 73047 |
| FOSTER, DWAIN A. SR. | 214425 |
| FOSTER, JACK R. JR. | 68112 |
| FOSTER, JOHN A. JR. | 20637 |
| GALLIGAN, MICHAEL H. | 558067 |
| GALOVIN, STEVEN W. SR. | 833571 |
| GALVIN, JOHN L. | 10169 |
| GARDNER, JOHN P. III | 324145 |
| GOULD, DEAN | 145003 |
| GOULD, ROBERT J. JR. | 49495 |
| GOULD, ROBERT L. | 254042 |
| GOULD, STEVEN D. | 590097 |
| GRONHOLDT, PETER N. JR. | 560205 |
| GUNDERSEN, CHARLES K. | 764124 |
| GUNDERSEN, KIM L. | 264753 |
| GUNDERSEN, MARTIN H. | 316593 |
| GUNDERSEN, WAYNE K. | 289583 |
| HINTON, JOE | 769419 |
| HOBLET, IVAN | 766602 |
| HOBLET, TOM C. | 160129 |
| HOLMBERG, ARTHUR J. | 731792 |
| HOLMBERG, RAYMOND | 917976 |
| JACKSON, GEORGE E. JR. | 717315 |
| JACOBSEN, DICK | 621889 |
| JOHANNESSEN, NORMAN E. | 858038 |
| JOHANSEN, ROBERT | 332693 |
| JOHNSON, ROBERT M. | 208976 |
| KALMAKOFF, ARTEMIE JR. | 250462 |
| KUZAKIN, NORMAN L. | 983873 |
| LARSEN, ROBIN | 758721 |
| LUNDGREN, TAYLOR | 814681 |
| MACK, JEREMY J. | 119236 |
| MACK, KENNETH JR. | 570575 |
| MACK, KENNETH B. SR. | 508669 |
| MARTISHEV, IOSIF | 741457 |
| MARUNDE, BRADY | 577185 |
| NEWTON, GRANT L. | 350279 |
| NYBERG, ROBERT B. | 621362 |
| OGATA, DUKE | 238835 |
| OGATA, RAYMOND | 871798 |
| PEDERSEN, DALE E. | 431641 |
| PEDERSEN, DEAN | 497450 |
| PENDERGRAFT, LEO | 998324 |
| POLUSHKIN, ARSENY | 508935 |
| POLUSHKIN, DAVID | 920630 |
| PORTER, VIRGIL | 759607 |
| REUTOV, ANDREY | 482055 |
| REUTOV, DAVID | 241799 |
| REUTOV, FEODOR I. | 888279 |
| REUTOV, GEORGE | 370817 |
| REUTOV, GREGORY | 437906 |
| REUTOV, MAVRIK S. | 909780 |
| SAGER, BILL R. | 85977 |
| SAMUELSON, HERMAN E. | 120244 |
| SHURAVLOFF, PETER A. | 127281 |
| SMITH, BRANDON J. | 667600 |
| SMITH, JIM R. | 551899 |
| SPARLIN, R.DREW JR. | 32861 |
| STOVER, MATTHEW H. | 114980 |
| THOMPSON, KILEY | 464990 |
| VERG.IN, RHY | 502502 |
| WAGNER, MARK J. | 50981 |
| WENZEL, CHRISTOPHER J. | 404747 |
| WILLIAMS, KEITH | 710908 |
| WILSON, ANDREW | 161349 |
| WILSON, DAVID R. JR. | 47539 |
| WILSON, JUSTIN C. | 204415 |
| WILSON, WARREN E. | 456400 |
| Count | 79 |

| 2020 | |
|------------------------|-----------|
| Permit holder | C FEC ID |
| ALFIERI, MICHAEL JR. | 425 |
| ANDERSON, MARK T. | 102612 |
| ANFILOFEV, TIMOFIY | 591500 |
| BARNETT, ROBERT M. | 550462 |
| BENDIXEN, CRAIG H. | 77370 |
| BOUSLEY, TROY | 732051 |
| BROWN, PATRICK J. | 715813 |
| CUMBERLIDGE, DANNY | 835219 |
| DUSHKIN, WILLIAM N. | 634929 |
| FOSTER, BRUCE JR. | 73047 |
| FOSTER, DWAIN A. SR. | 214425 |
| FOSTER, JACK R. JR. | 68112 |
| GALLIGAN, MICHAEL H. | 558067 |
| GALOVIN, STEVEN W. SR. | 833571 |
| GARDNER, JOHN P. III | 324145 |
| GOULD, DEAN | 145003 |
| GOULD, ROBERT J. JR. | 49495 |
| GOULD, ROBERT L. | 254042 |
| GOULD, STEVEN D. | 590097 |
| GUNDERSEN, CHARLES K. | 764124 |
| GUNDERSEN, KIM L. | 264753 |
| GUNDERSEN, MARTIN H. | 316593 |
| GUNDERSEN, WAYNE K. | 289583 |
| HINTON, JOE | 769419 |
| HOBLET, TOM C. | 160129 |
| HOBLET, TRAVIS S. | 508831 |
| HOLMBERG, RAYMOND | 917976 |
| JACKSON, GEORGE E. JR. | 717315 |
| JACOBSEN, DICK | 621889 |
| KALMAKOFF, ARTEMIE JR. | 250462 |
| KUZMIN, FADEY | 246687 |
| LUNDGREN, TAYLOR | 814681 |
| MACK, KENNETH JR. | 570575 |
| MACK, KENNETH B. SR. | 508669 |
| MARTISHEV, DAVID I. | 385365 |
| MARTISHEV, IOSIF | 741457 |
| MARUNDE, BRADY | 577185 |
| MCCALLUM, DON C. | 425874 |
| MITCHELL, ALLEN | 346626 |
| NEWTON, GRANT L. | 350279 |
| NYBERG, ROBERT B. | 621362 |
| PEDERSEN, DALE E. | 431641 |
| PEDERSEN, DEAN | 497450 |
| PENDERGRAFT, LEO | 998324 |
| POLUSHKIN, DAVID | 920630 |
| REUTOV, ANDREY | 482055 |
| REUTOV, GREGORY | 437906 |
| SAMUELSON, HERMAN E. | 120244 |
| SHURAVLOFF, PETER A. | 127281 |
| SMITH, BRANDON J. | 667600 |
| SPARLIN, R.DREW JR. | 32861 |
| THOMPSON, KILEY | 464990 |
| VERG.IN, RHY | 502502 |
| WENZEL, CHRISTOPHER J. | 404747 |
| WILSON, ANDREW | 161349 |
| WILSON, JUSTIN C. | 204415 |
| WILSON, WARREN E. | 456400 |
| Count | 57 |

| 2021 | |
|--------------------------|-----------|
| Permit holder | C FEC ID |
| ANFILOFEV, TIMOFIY | 591500 |
| ARBELOVSKY, STACY | 201502 |
| BARNETT, ROBERT M. | 550462 |
| BENDIXEN, CRAIG H. | 77370 |
| BOUSLEY, TROY | 732051 |
| BROWN, PATRICK J. | 715813 |
| CALUGAN, PETER B. | 235334 |
| CUMBERLIDGE, DANNY | 835219 |
| DEERING, BRAD W. | 930990 |
| DELONG, DUSTIN | 505951 |
| DUSHKIN, WILLIAM N. | 634929 |
| EASTLICK, RICHARD E. | 696280 |
| FEFELOV, IVAN | 88788 |
| FOSTER, BRUCE JR. | 73047 |
| FOSTER, DWAIN A. SR. | 214425 |
| FOSTER, JACK R. JR. | 68112 |
| FOSTER, JOHN A. JR. | 20637 |
| GALOVIN, STEVEN W. SR. | 833571 |
| GALVIN, JOHN L. | 10169 |
| GARDNER, JOHN P. III | 324145 |
| GOULD, DEAN | 145003 |
| GOULD, ROBERT J. JR. | 49495 |
| GOULD, ROBERT L. | 254042 |
| GOULD, STEVEN D. | 590097 |
| GUNDERSEN, CHARLES K. | 764124 |
| GUNDERSEN, KIM L. | 264753 |
| GUNDERSEN, MARTIN H. | 316593 |
| GUNDERSEN, WAYNE K. | 289583 |
| HINTON, JOE | 769419 |
| HOBLET, TOM C. | 160129 |
| HOLMBERG, ARTHUR J. | 731792 |
| HOLMBERG, RAYMOND | 917976 |
| JACKSON, CHARLES | 539108 |
| JACKSON, CHARLES W. | 846494 |
| JACKSON, GEORGE E. JR. | 717315 |
| JACOBSEN, DICK | 621889 |
| KALMAKOFF, ARTEMIE JR. | 250462 |
| KUSNETSOV, ANDREAN I. | 601690 |
| LARSEN, ROBIN | 758721 |
| LUNDGREN, TAYLOR | 814681 |
| MACK, KENNETH JR. | 570575 |
| MACK, KENNETH B. SR. | 508669 |
| MANOS, ANDREW G. | 540272 |
| MARTISHEV, IOSIF | 741457 |
| MARUNDE, BRADY | 577185 |
| MCCALLUM, DON C. | 425874 |
| MEDINA, JOSE F. JR. | 43633 |
| MITCHELL, ALLEN | 346626 |
| NEWMAN, ALVIN J. JR. | 207618 |
| NEWTON, GRANT L. | 350279 |
| NUTT, RAYMOND E. | 196636 |
| NYBERG, ROBERT B. | 621362 |
| PEDERSEN, DALE E. | 431641 |
| PEDERSEN, DEAN | 497450 |
| PENDERGRAFT, LEO | 998324 |
| POLUSHKIN, DAVID | 920630 |
| REUTOV, ALEXANDER E. | 806565 |
| REUTOV, ANDREY | 482055 |
| REUTOV, ARSENY D. | 285025 |
| REUTOV, DAVID | 241799 |
| REUTOV, DIMITRY L. | 702970 |
| REUTOV, FEODOR I. | 888279 |
| REUTOV, GEORGE | 370817 |
| REUTOV, GREGORY | 437906 |
| REUTOV, KIRICK S. | 1999 |
| REUTOV, MAVRIK S. | 909780 |
| REUTOV, SERGEI F. | 512265 |
| REUTOV, TIMON S. | 719334 |
| SAGER, BILL R. | 85977 |
| SAMUELSON, HERMAN E. | 120244 |
| SHURAVLOFF, PETER A. | 127281 |
| SMITH, BRANDON J. | 667600 |
| SMITH, KARL | 437939 |
| SNIGIREV, VARIFALAMEI A. | 753934 |
| SPARLIN, R.DREW JR. | 32861 |
| THOMPSON, KILEY | 464990 |
| VERG.IN, RHY | 502502 |
| WILSON, ANDREW | 161349 |
| WILSON, JUSTIN C. | 204415 |
| WILSON, WARREN E. | 456400 |
| Count | 80 |



Letter Request to Reschedule Proposal 282

December 22, 2021

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

| 2019 | |
|------------------------|----------------|
| Permit holder | CFEC ID |
| ALFIERI, MICHAEL JR. | 425 |
| FOSTER, ANDREW R. | 193461 |
| FOSTER, BRUCE JR. | 73047 |
| FOSTER, DWAIN A. SR. | 214425 |
| FOSTER, JACK R. JR. | 68112 |
| FOSTER, JOHN A. JR. | 20637 |
| GALLIGAN, MICHAEL H. | 558067 |
| GALOVIN, STEVEN W. SR. | 833571 |
| GOULD, DEAN | 145003 |
| GOULD, ROBERT L. | 254042 |
| HOBLET, IVAN | 766602 |
| HOBLET, TOM C. | 160129 |
| HOLMBERG, ARTHUR J. | 731792 |
| JACOBSEN, DICK | 621889 |
| JOHANNESSEN, NORMAN E. | 858038 |
| JOHNSON, ROBERT M. | 208976 |
| LARSEN, ROBIN | 758721 |
| LUNDGREN, TAYLOR | 814681 |
| MACK, KENNETH JR. | 570575 |
| MACK, KENNETH B. SR. | 508669 |
| PEDERSEN, DALE E. | 431641 |
| PEDERSEN, DEAN | 497450 |
| SAMUELSON, HERMAN E. | 120244 |
| THOMPSON, KILEY | 464990 |
| WILLIAMS, KEITH | 710908 |
| WILSON, ANDREW | 161349 |
| WILSON, DAVID R. JR. | 47539 |
| WILSON, JUSTIN C. | 204415 |
| Count | 28 |

| 2020 | |
|------------------------|----------------|
| Permit holder | CFEC ID |
| ALFIERI, MICHAEL JR. | 425 |
| ANDERSON, MARK T. | 102612 |
| DZIEDZIC, MATTHEW | 258950 |
| FOSTER, BRUCE JR. | 73047 |
| FOSTER, DWAIN A. JR. | 935163 |
| FOSTER, DWAIN A. SR. | 214425 |
| FOSTER, JACK R. JR. | 68112 |
| GALLIGAN, MICHAEL H. | 558067 |
| GALOVIN, STEVEN W. SR. | 833571 |
| GOULD, DEAN | 145003 |
| GOULD, ROBERT L. | 254042 |
| HOBLET, TOM C. | 160129 |
| HOBLET, TRAVIS S. | 508831 |
| JACOBSEN, DICK | 621889 |
| JOHANNESSEN, NORMAN E. | 858038 |
| LUNDGREN, TAYLOR | 814681 |
| MACK, KENNETH JR. | 570575 |
| MACK, KENNETH B. SR. | 508669 |
| MANOS, ANDREW G. | 540272 |
| MCCALLUM, DON C. | 425874 |
| PEDERSEN, DALE E. | 431641 |
| PEDERSEN, DEAN | 497450 |
| SAMUELSON, HERMAN E. | 120244 |
| THOMPSON, KILEY | 464990 |
| WILLIAMS, KEITH | 710908 |
| WILSON, ANDREW | 161349 |
| WILSON, JUSTIN C. | 204415 |
| Count | 27 |

| 2021 | |
|------------------------|----------------|
| Permit holder | CFEC ID |
| CUMBERLIDGE, DANNY | 835219 |
| DZIEDZIC, MATTHEW | 258950 |
| FOSTER, BRUCE JR. | 73047 |
| FOSTER, DWAIN A. JR. | 935163 |
| FOSTER, DWAIN A. SR. | 214425 |
| FOSTER, JACK R. JR. | 68112 |
| FOSTER, JOHN A. JR. | 20637 |
| GALOVIN, STEVEN W. SR. | 833571 |
| GOULD, DEAN | 145003 |
| GOULD, ROBERT L. | 254042 |
| HOBLET, TOM C. | 160129 |
| HOLMBERG, ARTHUR J. | 731792 |
| JACOBSEN, DICK | 621889 |
| LARSEN, ROBIN | 758721 |
| LUNDGREN, TAYLOR | 814681 |
| MACK, KENNETH JR. | 570575 |
| MACK, KENNETH B. SR. | 508669 |
| MANOS, ANDREW G. | 540272 |
| MCCALLUM, DON C. | 425874 |
| NEWMAN, ALVIN J. JR. | 207618 |
| NUTT, RAYMOND E. | 196636 |
| PEDERSEN, DALE E. | 431641 |
| PEDERSEN, DEAN | 497450 |
| SAMUELSON, HERMAN E. | 120244 |
| THOMPSON, KILEY | 464990 |
| WILLIAMS, KEITH | 710908 |
| WILSON, ANDREW | 161349 |
| WILSON, JUSTIN C. | 204415 |
| Count | 28 |



Letter Request to Reschedule Proposal 282
December 22, 2021

Sincerely,

The undersigned

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

Letter Request to Reschedule Proposal 282
December 22, 2021

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



Letter Request to Reschedule Proposal 282
December 22, 2021

Sincerely,

Kiley Thompson
Area M Seiners Association

Allen [Signature]
Name: *HARBOR MASTER*
Organization/Affiliation:

[Signature]
Name:
Organization/Affiliation:

Sergei Prokhorov
Name:
Organization/Affiliation: *CREW / FISHERMAN*

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

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

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

John A. Foster
Name: *JOHN A. FOSTER*
Organization/Affiliation: *AREA M SETNETTER PRES. UWGA TRIBAL COUNCIL*

James Brown
Name: *JAMES BROWN*
Organization/Affiliation: *RIP GECREST APARTMENT*

[Signature]
Name:
Organization/Affiliation:

Charles C. Gundersen
Name:
Organization/Affiliation:

amy m [Signature]
Name: *Area m set netter*
Organization/Affiliation:

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:



Letter Request to Reschedule Proposal 262
December 22, 2021

Sincerely,

Kiley Thompson
Area M Seiners Association

Osuna Wilson
Name: HANA JOANN
Organization/Affiliation:

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

Osuna Wilson
Name: HANA JOANN
Organization/Affiliation:

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

SKY
Name:
Organization/Affiliation:

ST. FRANCES
Name: FV ST. FRANCES
Organization/Affiliation:

SKY
Name:
Organization/Affiliation:

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

SKY
Name:
Organization/Affiliation:

Shannon Truitt
Name: FV Shannon Truitt
Organization/Affiliation:

SKY
Name:
Organization/Affiliation:

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

Miss Roxanne
Name:
Organization/Affiliation:

Advantage
Name: F/V Advantage
Organization/Affiliation:

SKY
Name:
Organization/Affiliation:



Letter Request to Reschedule Proposal 282
December 22, 2021

Jason Mack

Name: Murray Mack
Organization/Affiliation:

[Signature]

Name:
Organization/Affiliation:

Craig Bendixen Bendit

Name:
Organization/Affiliation:

Avahie R E Gould

Name:
Organization/Affiliation:

Ion Samuelson

Name:
Organization/Affiliation:

Ashten Gould

Name:
Organization/Affiliation:

Avery Samuelson

Name:
Organization/Affiliation:

Herman Bendixen

Name:
Organization/Affiliation:

Conner Samuelson

Name:
Organization/Affiliation:

Leah Gould

Name:
Organization/Affiliation:

Eric Samuelson

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Randy Samuelson

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Don Hall

Name:
Organization/Affiliation:

Name:
Organization/Affiliation:

Will

Name: Andrew Wilson
Organization/Affiliation: Miss Cathy Kim

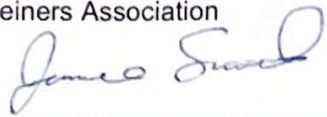
Name:
Organization/Affiliation:



Letter Request to Reschedule Proposal 282
December 22, 2021

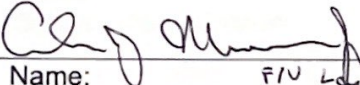
Sincerely,

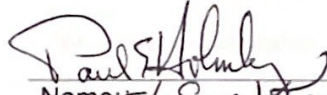

Kiley Thompson
Area M Seiners Association

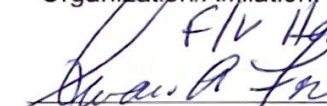

Name: James Smith, Mayor
Organization/Affiliation: Sand Point

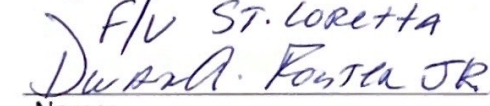

Name: F/V CELTIC
Organization/Affiliation:



Name:
Organization/Affiliation: F/V TERN

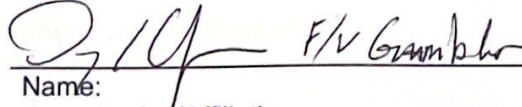

Name: F/V LARRY JACOBSON
Organization/Affiliation:


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


Name: F/V HEATHER MARSON
Organization/Affiliation:


Name: F/V ST. LORETTA
Organization/Affiliation:


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


Name:
Organization/Affiliation:

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Letter Request to Reschedule Proposal 282
December 22, 2021

M. K. Lee
Name:
Organization/Affiliation:

Temptation Inc
Name:
Organization/Affiliation:

David Osterback
Name:
Organization/Affiliation:

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

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Organization/Affiliation:

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Organization/Affiliation:



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

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

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

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

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

Sincerely,

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

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



PC034
1 of 1

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

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



PC035
1 of 1

Phone
(907) 854-2357
Email
aurorakathleentaylor@gmail.com
Address
179 Price St. Apt B
Sitka, Alaska 99835

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

Proposal 156: Support

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

Proposal 157: Support

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

Proposal 158: Support

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

Proposal 160: Oppose

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

Proposal 162: Support

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

Proposal 165: Oppose

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

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



PC036
1 of 1

Phone
6184029057
Email
autumn.simons14@gmail.com
Address
914 Calhoun Ave
Apt 2
Juneau, Alaska 99801

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

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

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

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

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



PC037
1 of 1

Hi,

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

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



PC038
1 of 1

Phone
9076238154
Email
bjanderson@gci.net
Address
130 Indian River Road
Apt A
Sitka, Alaska 99835

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

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



PC039
1 of 1

Phone
571-594-6097
Email
merrigold@gmail.com
Address
4505 Cedar Springs Rd
Apt 115
Dallas, Texas 75219

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

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



PC040
1 of 1

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

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

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

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



PC041
1 of 4

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

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



PC041
2 of 4

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

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



PC041
3 of 4

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

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



PC041
4 of 4

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

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



PC042
1 of 1

Phone
9077386150
Email
lawriebs@gmail.com
Address
339 Wortman Loop
Sitka, Alaska 99835

Members of the Board of Fisheries,

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

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

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

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

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

Thank you for your consideration,

Benjamin Lawrie

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



PC043
1 of 1

Phone
907-738-2260
Email
Bentimby@gmail.com
Address
1403 Halibut Point Rd
Sitka, Alaska 99835

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



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

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

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

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

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

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

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

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

Thank you for your time.

Bert Bergman
F/v Minke

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

Sent from my iPad



PC044
2 of 2

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



PC045
1 of 1

Phone
9077384392
Email
bethany@sitkawild.org
Address
500 Lincoln Street Unit B7
Sitka, Alaska 99835

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

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

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

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

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

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

For these reasons I write **in support of proposals 156, 157, and 158** which would lead to more conservative management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

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

Thank you for respecting our voices.

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



PC046
1 of 1

Dear Board of Fisheries,

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

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

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

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

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

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

Thank you,

Bill Hanson

Douglas, Alaska



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



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

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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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

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

Sincerely,

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

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



PC048
1 of 1

Phone
7634380238
Email
william.kane@outlook.com
Address
PO Box 240194
Juneau, Alaska 99824

Hello Board Members,

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

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

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

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

Metadata – SEAGO Chinook Harvest Estimate Tables by TierPC049
1 of 3

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

Important Notes:

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



= % Gain to Sport

= % Gain to Troll

Non-Resident Bag and Annual Limits

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

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

(Calculated as if no SEAK wildstock closures occurring.)

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

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



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

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



PC050
1 of 1

Phone
9077969632
Email
bonniede@aptalaska.net
Address
PO Box 1762
Wrangell, Alaska 99929

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

Submitted By
brad smith
Submitted On
12/22/2021 7:18:57 PM
Affiliation



PC051
1 of 1

Phone
5416215052
Email
bradsmith@fastmail.com
Address
po box 346
Williams, Oregon 97544

The annual herring run was always an exciting time for me growing up in Sitka. All along the shores one could fill a bucket fast just by casting a line. The energy of the whole coast seemed to be glowing with life. At the time I did not realize how vitally important this fish run is.

Herring are the food that our food eats.

After winter, all of the animals are hungry.

One doesn't have to be a biologist to see how detrimental the effects of losing the vigor of the herring run is due to managing the fishery with a skewed definition of actual value. The value of a robust annual herring population, unweakened by large-scale extraction, cannot be quantified or matched with dollars.

Many of my friends who harvest the roe along the coast have expressed that it is not as abundant as it used to be, even when the spawn is in the area. Many of the fish that feed on herring have diminished populations too.

The way this resource is extracted could be reviewed. Have you considered taking a year off? Many folks do not consider it "fishing" when you use planes and giant vacuums. This is industrial extraction.

Thank you for listening.



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

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

I am Brad Steuart, owner of Alaska's Boardwalk Lodge. We have been in business for over 20 years – through thick and thin times. We have five 28 -foot cabin cruisers which enable us to take about 20 people fishing at a time from June to October each year. In all, we serve about 400 people each year. We love this work and want it to continue to bless the lives of others for any years to come. Not only do we serve our clients but serve our community by hiring most of our staff locally. We also help local citizens and businesses by using their services in many ways to help keep our business alive. So. We contribute heavily to the commerce of Thorne Bay and the the state of Alaska.

King salmon are critical to my operation all season, and especially early. Kings are one of just a few fish that really attract anglers to come to Alaska. When the runs are low and the state limits on Kings are minimal, the interest of many in coming to Alaska are affected. Note that most of our guests are non-residents.

Therefore, I do not support Proposal 82. I'm concerned about the loss of opportunity for non-residents to keep kings in low abundance under this proposal. Attracting fisherman that support local jobs, tax bases, and economies will take a sizable hit if Proposal 82 is allowed to pass.

I do support Proposal 83 that keeps workable regulations in low abundance and avoids "inseason" management. It would be much better for customers to have similar regulations each year than to liberalize limits in high abundance years and get strict limits or closures in low abundance years, or to close the fishery unexpectedly. People spend a lot of money to come and enjoy our fishing in Alaska. It is very disconcerting for them to arrive with high expectations of a remarkable trip and to be told after they arrive that they cannot fish for Kings – that an emergency closure was just put into place.

The proposed cuts to sport regulations in Proposal 82 seem harsh from what sport fisherman have been allowed. I do support residence fishing. But believe we must also protect non-residents fishing opportunities. I believe it is important to have enough fish to support residents needs but also to keep enough opportunity for non-residents to keep Kings so they will continue to visit us in Southeast Alaska every year.

In my opinion, Proposal 83 does a better job for both resident and non-resident fisherman than does Proposal 82.

I realize that the Board is working diligently to find a fair tradeoff between all groups interested in Kings and hope that your efforts will be able to accomplish the goal of appropriately



supporting the desires of both resident and non-resident sport fishing in a manner that it can be open all season for both groups.

Sincerely Yours,

Brad Steuart | Owner | 801-725-9866 | www.boardwalklodge.com

ALASKA'S BOARDWALK LODGE

"Fishing Lodge of the Year" – *Sporting Classics Magazine*

Submitted By
Brandon Snyder
Submitted On
12/19/2021 6:47:01 PM
Affiliation
Commercial Crabber



PC053
1 of 1

Phone
907-738-1913
Email
snyder.72349@gmail.com
Address
1925 Anna Circle
Sitka, Alaska 99835

Hello Board of Fish,

My name is Brandon Snyder, I am 26 years old, and I was born and raised in Sitka Alaska and have been commercial fishing since age 13. I purchased a Dungeness permit, vessel and gear 4 years ago in 2018. That I am still in the process of paying off. Since then, I have fished all 8 open seasons based here out of Sitka and have had lifelong Sitkan's as my crewmembers. My reason for contacting you is it has been brought to my attention that there are numerous Dungeness crab proposals, in which they could close currently open crab grounds. Crab grounds that have been managed and sustained very well with great return rates! Such as proposal 201, which is one of the areas I have regularly crabbed in. The reasons I strongly **oppose proposal 201** is:

1. These crabbing grounds are very crucial to everywhere in southeast's dundy fisheries staying open, by being included in the overall catch threshold for southeast's summer seasons first two weeks total. Which indicates whether or not the fishery will open in the fall. In other words, closing these areas could dramatically effect towns across Southeast Alaska.
2. These areas are also the more safe and protected spots to crab, where many young people like myself start out to get the hang of their vessels, equipment, and how the fishery works so they can safely and properly operate.
3. Many of us local crabbers here in Sitka (myself being one) sell a huge portion of our crab locally at the docks to Sitka locals that can't go catch it themselves, many of them being elders and Sitka tribe of Alaska members that have traditionally eaten crab for generations!
4. There is already the VAST majority of Sitka's surrounding area already closed to commercial Dungeness crabbing. In which it leaves massive crabbing grounds open for sport fisherman to crab in, meaning commercial boats have to travel very far to access open waters as is, even before possibly closing more waters.
5. The waters included in proposal 201 have been traditionally fished in for over 3 decades and have proven to be the entry level to new youth learning the fishery. If these waters close it will be the beginning of this fishery diminishing to non-existence.

With that I would like to **oppose proposal 201**.

Thank you for your consideration,

Brandon Snyder – F/V Half Moon

Submitted By
brett stillwaugh
Submitted On
12/20/2021 6:38:56 PM
Affiliation



PC054
1 of 3

Proposition 181 , As the maker of this proposal , I would like to withdrawl it from consideration . as to the reason for my withdrawl you have to look at the history of the fishery . From 2002 through 2021 there have been 3 years of substancial pink harvest . The other 16 years , the few boats fishing worked on fishing sidestripe shrimp . I spent 20 years building fresh markets for sidestripe shrimp. When the pink shrimp fishery came back in 2017 , 2019 and larger volumes of sidestripe shrimp were caught with the pinks , I experienced twice ADF&G's reluctance to open the sidestripe fishery without any valid reason other than the bioligist did not feel good about it . I believe there need to be some changes , because we have 2 fisheries competeing under one set of regulations . I also believe there needs to be more input from the stakeholders in the fishery and at this time do not think this regulation change can accomplish what is needed.

Submitted By
brett stillwaugh
Submitted On
12/22/2021 5:01:23 PM
Affiliation



PC054
2 of 3

Proposal 180

As the maker of this proposal (Brett Stillwaugh) I would like to give the reasonings I arrived at in putting this proposal together . This is the only fishery in southeast Alaska , to my knowledge that has language in the regulations referring to observers . I question the need and cost of having observers in this small fishery . As I stated in my proposal , it is the cost of the obsevers and nothing to do with being observed . I welcome ADF&G to come out at any time or pull up alongside and everything is viewable . There have been stretches of time sidestripe shrimp fishing where we avg. 500.. -700.00 a day . after wages and expense ,it leaves 150.00 -200 a day . currently observer coverage is 350.00- 400 per day . double what I earn as the captain and owner of the business. As a resident local fisherman , there are few winter fishing income opportunities here . The observer law as written into the Southeast beam trawl regulations is extremely vague , to the point some ADF&G personel in my conversations believe it to be ADF&G who do the observing . This regulation was used a few years back to keep me from requesting a sidestripe opening . I was told I would have to pay for an observer if ADF&G were to open the fishery . The cost was to high and I backed off the request . I do no believe ADF&G needs this Regulation as most of this fishery has been conducted as a day fishery where we are in port every night .

Submitted By
brett stillwaugh
Submitted On
12/22/2021 6:46:36 PM
Affiliation



PC054
3 of 3

comment on proposal 83

As a commercial troller and year round resident in southeast Alaska , we have continually taken cuts in our king salmon quotas , and now with our local stocks of concern , it is not time to expand the non resident sport fish harvest . This would likely be the outcome of this proposal . Sport harvest should be managed inseason and held to their quota as the other user groups. I oppose this proposal , as i see it as an attempt of one group to circumnavigate the 80/20 allocation

Submitted By
Bridget Hitchcock
Submitted On
12/12/2021 8:06:23 AM
Affiliation



PC055
1 of 1

Phone
9077385515
Email
bridgethitchcock@hotmail.com
Address
204 Jeff Davis St.
Sitka, Alaska 99835-7620

I have been a Sitka resident since 1993, and I am writing to strongly support proposals 156, 157, and 158. I strongly oppose proposals 159, 160, 161, 163, 164, and 165.

Even having lived here for less than 30 years, I have seen many changes in the abundance of the herring. Tlingit people have lived here for thousands and thousands of years, so I realize that the changes they have seen are far more significant. As an ally, I support their plea to conserve the remaining herring and increase future herring abundance. It is difficult to understand why a fishery that benefits few overrides a practice that is so important to not only the Tlingit culture and other sitkans that harvest herring eggs, but also to the other marine mammals, birds, and fish that eat herring to survive.

Thank you for your time and I hope you do the right thing this year.

Submitted By
Britt Tonnessen
Submitted On
12/17/2021 6:25:44 AM
Affiliation



PC056
1 of 1

Dear Board of Fish,

As an implant in Alaska I have learned the importance of herring and heard the stories of times past of now unimaginable amounts of herring, herring eggs, and bountiful wildlife that depends on them. Also, my feeds, emails, and meetings are full of people sharing stories, recipes, and the eggs themselves. It's critical for human cultural use.

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

My understanding is that while though not enough to restore these proposals are a start.

Kindly,

Britt Tonnessen



From: [Hwest](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: King salmon proposals 82 and 83
Date: Wednesday, December 22, 2021 6:14:48 AM

[You don't often get email from hwest@teleport.com. Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Marit Carlson Van Dort, chairman
Alaska board of fisheries
1255 W 8th st
Juneau, Ak 99811
Re: king salmon management proposals 82 and 83

Chair Carlson Van Dort and members of the board,
My name is Bruce Gipple and my wife and I own Horizon west guides and outfitters in Sitka Alaska, where we run a 4 boat, mom and pop lodge for the past 29years. Prior to this we operated on the Kenia river for 9 years before moving south.

We employ 12to 14 people in season and try to keep mechanics, construction, and a variety of Sitkans busy as much as possible year round. Sport fishing is our only income and has been for the past 44 years,(we're older than dirt). We love what we do and even though I'm 70 I can't imagine doing anything else.

I do not support proposal 82. The loss of opportunity for for non residents (95% of my business) to catch King salmon especially in the early season (may/ June)

When the main focus for them to be there is King salmon, will be devastating for my business and for the community of Sitka. I speak with some knowledge on the effects this can have on a community from my early days on the Kenia river, where the state imposed the first emergency in season closures in June back in the 1980s. We and everyone else were fully booked and with clients arriving had to inform them that they could no longer catch and keep King Salmon. Needless to say, the impact was devastating on the following years bookings with a 80% drop in revenue and was never able to recover from it, which is one of the reasons I moved to Sitka.

If the proposal 82 is implemented, it would have the same effect on our early season fisheries, which are concentrated on King salmon primarily. I estimate it would result in a 30-40% drop in revenue for my business and have a major impact on the Sitka community.

I believe that residents should have a priority and be able to catch Kings to live on, I believe that they also need money to live on and for those residents that rely on the sport fishing industry for there living, having a 30-40% drop in there income can have just as devastating effect as not having enough kings in the freezer. There has to be a balance.

I support proposal 83 as I think it's a better balance for our industry and for Alaska.

Thank you for your time and appreciate your thoughtfulness on these matters.

Bruce Gipple
Horizon West guides
360-600-6869
Sent from my iPhone

Submitted By
Bryan Lovett
Submitted On
12/22/2021 4:10:14 PM
Affiliation



PC058
1 of 1

Phone
9077381215
Email
gottalovett07@gmail.com
Address
1113 Furuheim St.
Sitka, Alaska 99835

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

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

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

Thank you and Gunalchéesh,

-Bryan

Submitted By
Caleb Robbins
Submitted On
12/16/2021 8:28:29 AM
Affiliation
troll

Phone
2088909608
Email
fairweatherfishco@gmail.com
Address
po box 6256
sitka, Alaska 99835



PC059
1 of 5

I caleb robbins a southeast alaska power troll gear card holder am in support of Proposal 89

Submitted By
caleb robbins
Submitted On
12/17/2021 7:06:54 AM
Affiliation
commercial fisherman



PC059
2 of 5

Phone
2088909608
Email
caleb.blufin@gmail.com
Address
Po Box 6256
Sitka, Alaska 99835

I caleb Robbins would like to formally oppose props 101and 103. they are harmful to the hatcehry groups in alaska that sustainably help our fleet and coastal waters. its a well managed hatchery with the eviroment in mind first and keeps up on all the proper research.

Submitted By
Caleb Robbins
Submitted On
12/17/2021 8:44:55 AM
Affiliation
troll, shrimp pot fishery



PC059
3 of 5

Phone
2088909608
Email
fairweatherfishco@gmail.com
Address
Po Box 6256
Sitka, Alaska 99835

i caleb robbins am in support of props 171,172,173,174

I believe there is a process/action we need to do to start helping our shrimp fisheries thrive not just survive. this fishery is managed more on what the department has time for and what aligns with people fishing schedule rather than whats good for the resource. we are harvesting shrimp in peak spawn season. Different spot prawn fisheries to the south have changed their schedule/season and are now seeing an increase in stocks.why wait till it's too late.

Submitted By
Caleb Robbins
Submitted On
12/17/2021 7:21:10 AM
Affiliation
commercial fisherman



PC059
4 of 5

Phone
2088909608
Email
fairweatherfishco@gmail.com
Address
Po Box 6256
Sitka, Alaska 99835

I caleb robbins would like to publicly support prop 144 I feel there is a lack of accountability among the charter groups and how the vessel is ran. I run farmers markets down south in the winter and I hear non stop different stories from fellows that have been on an Alaska guided trip and they where allowed to keep more than there limit or even the boat captain giving his share to the clients. Some clients bring so many pounds home they gloat about selling it to their friends or family to pay for their trip.

Submitted By
Caleb Robbins
Submitted On
12/17/2021 7:13:21 AM
Affiliation
Power Troll



PC059
5 of 5

Phone
2088909608
Email
fairweatherfishco@gmail.com
Address
Po Box 6256
Sitka, Alaska 99835

I caleb robbins would like to publicly oppose prop 82 and support props 83. the management ADF&G knows how to best manage the fleet along with sport fisherman.

keep in mind please the state at the begging wanted to allocate fish to subsistence above all then next was commercial fleet and last sport. as though the state see the instant money gained by sport the commercial fleet is an essential foundation for southeast communities. thank you.

Submitted By
Caleb Suarez
Submitted On
12/17/2021 3:08:31 PM
Affiliation
Charter Captain in Sitka



PC060
1 of 1

I am commenting on proposals 82 and 83 (SEAGO)

My name is Caleb Suarez. I have lived in Sitka my whole life, and can recall many fond memories of fishing with my family in Sitka Sound. Fishing is, and has been a major part of our lives as it is for many who live here. I myself make my living as a charter captain for Kingfisher Charters in the summer time, and depend on this job as a source of income to provide for my family and I.

Although king salmon catch does not directly result in income for charter fisherman, the regulations and consistency in catch are what create a stable and reliable stream of customers and revenue. Just this past year, I had several complaints from guests about king salmon being closed for a portion of the year. Several of these customers refused to rebook trips for following years during these dates. If Alaska continues this policy of completely closing the king salmon to charter fisherman, it will become increasingly difficult to book trips in the latter half of the season. I can almost certainly guarantee that by repeatedly closing, or have threat of closing, the king salmon fishery for charter and resident fisherman will hurt revenue and business for the citizens of Sitka, Alaska.

Submitted By
Callie D Simmons
Submitted On
12/22/2021 5:27:41 PM
Affiliation



PC061
1 of 1

Phone
5038078068
Email
calliedianesimmons@gmail.com
Address
206 Seward Street APT 4
APT 4
Sitka, Alaska 99835

Good afternoon,

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. We need to support the voices and people who have lived on Tlingit Aani since time immemorial and through whose stewardship sustained herring populations for thousands of years.

Gunalchéesh, thank you, for yor time and consideration,

Callie Simmons

Submitted By
Carly Dennis
Submitted On
12/22/2021 10:48:47 PM
Affiliation



PC062
1 of 1

I **support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience 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.

As a young Alaskan, I strongly believe the future of our state depends on our ability to rectify the violence committed against Native populations, and to resurrect Native ways of life, which were in general both richer and wiser than many contemporary practices. The management of the herring fishery should firmly center subsistence and traditional use of herring, and should err on the side of sustainability and prioritization of herring for future generations.

Submitted By
Carol Hughey
Submitted On
12/17/2021 7:11:35 AM
Affiliation



PC063
1 of 1

Please pass proposals 156, 157, and 158 to ensure we are managing our herring population with the needs of subsistence users in mind.

Proposals 159, 160, 161, 163, 164, and 165 all seek to maximize profits by the sac roe industry and do not engender the public benefits that our public resources should provide.

Submitted By
Carson
Submitted On
12/22/2021 5:18:55 PM
Affiliation



PC064
1 of 1

Phone
9077384561
Email
grantc423@gmail.com
Address
502 Charteris St
Sitka, Alaska 99835

To Whom It May Concern,

My name is Carson Grant. I am nineteen years old and live in Sitka. At the age of seventeen I was given the amazing opportunity to run my father's boat for the summer commercial dungeness crab season. After two successful seasons, I decided to invest in an additional crab permit. I am concerned about the potential changes to this fishery, and the negative impact it may have on my future as a commercial fisherman.

I strongly oppose Proposal 201. If this proposal were to be approved it would take away very valuable crabbing grounds that we are currently able to utilize. Pushing our crabbing grounds farther away from Sitka is not in the best interest of anyone.

Closing the areas listed in this proposal would force much more gear into Hoonah Sound, Peril Strait, and Chatham. This will certainly lead to lost gear, disputes between crabbers, and decreased profits.

Proposal 201 directly affects the entire southeast crab fishery when deciding the length of the season. Closing down these valuable grounds would decrease the total amount of crab caught in the first two weeks of the summer season, which determines how long the season will last.

Thank you all for taking the time to listen to my concerns. I hope you will consider the negative effects Proposal 201 would have on the southeast dungeness crabbing community and our families.

Sincerely,

Carson Grant- F/V Sailor

Submitted By
Catherine Jenkins
Submitted On
11/25/2021 10:24:50 AM
Affiliation



PC065
1 of 1

It is clear that your responsibility includes not just current fishing practices, but the future health of the fish resources of Alaska. According to the Alaska Department of Fish and Game's website, the purpose of the Board of Fisheries is the conservation and development of fisheries. The Board works with the Commissioner, whose functions are to "manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state."

It logically follows that you must **therefore approve** proposals 156, 157, and 158, which are designed to foster herring abundance and will benefit everybody in the long run. You also must reject proposals 159, 160, 161, 163, 164, and 165, which would expand the destructive practices used in commercial fishing and risk decreasing the size and health of local stocks along the coast.

Additionally, any significant decrease in the size or health of the herring population will have consequences for numerous other species that depend on the herring for food, such as salmon, whales, seals, sea lions, and multiple bird species. Each of these animals is also important for Alaskans, ranging from salmon fishing to the economic benefits of whale tourism.

As a state agency, your first responsibility is to the citizens of Alaska and the state's natural resources. But your decisions also have implications for the health of our oceans beyond Alaska's borders. I urge you to do the right thing for the herring and the people and animals who rely on them. Approve proposals 156, 157, and 158, and reject the desire of the commercial fishing industry to exploit Alaska's resources for their personal gain.

You may wonder why someone from Virginia cares enough to comment on the herring proposals. My daughter, a resident of Sitka, told me about this issue. When I independently researched the proposals before the Board and their potential environmental impact, I felt it important to advocate for the proposals that best support the long-term health of the herring population.

Submitted By
Catherine
Submitted On
12/14/2021 4:54:54 PM
Affiliation



PC066
1 of 1

Phone
9077380003
Email
catrey1986.catherine@gmail.com
Address
607 Sawmill Creek
sitka, Alaska 99835

I have been living in Sitka, Alaska since 2015 and know how important the herring are to Tlingit people and also non native residents of this community. Not only as subsistence to eat for humans, birds and other animals but also great for our soil and for the halibut and other sea creatures that benefit from the herring food chain. I am asking that you please support for proposals 156, 157 and 158. I oppose proposals 159, 160, 161, 162, 163, 164 and 165.

Submitted By
Catherine L Riley
Submitted On
12/22/2021 1:58:45 PM
Affiliation



PC067
1 of 1

I am writing today **in support of proposals 156, 157, and 158** which would lead to more sustainable 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.

I believe that the precautionary principal must be applied to herring management. The herring may be bountiful now, but with fast-changing ocean conditions and increasingly severe impacts of climate change, these populations could easily become stressed. Herring are critical to our way of life in Southeast Alaska and support the viability of all the other commercial fisheries that our economy depends on. The sac roe fishery is a wasteful utilization of this keystone species and the Board of Fish should endeavor to ensure that local people are able to fill their subsistence needs before permitting the mass export of this resource.



Submitter: Ceri Malein
PO Box 3114
Sitka, AK 99835
Phone No: 907 7474-6255
Email: matthew_donohoe@yahoo.com
Submitted by: 22, December, 2021
Subject: Comments on Finfish Proposal for 2022 BOF

To the Alaska Board of Fish:

Dear Members,

Comments on Covid 19

The CDC states that even with three vaccines one should avoid large indoor gatherings, venues where mask wearing is inconsistent, or ventilation is poor. The WHO recommends that individuals over 60 should postpone travelling to areas with high community transmission. The CDC is recommending against traveling at all.

The average age of Alaskan fishermen is over 50. Ketchikan is in High Alert for Covid. The Ketchikan hospital is overflowing and turning away patients.

Many knowledgeable seniors with histories of participating at BOF are choosing not to attend the January meeting because of Covid. Their large collective bank of information will not be available. The BOF is based on Public process, without these old timer's expertise there is greater potential for flawed outcomes.

The entire world is locking down due to the new highly transmittable Omicron Variant. Omicron has the highest breakthrough rate of any Covid variant so far. This means that even if one has had 3 vaccines one can still get Covid. My husband is 72 with comorbidities. We, and many others, are **extremely concerned** about threats to my, my husbands, and the public's health by this coming meeting. Still I feel we have to attend because of the importance of the Public Process BOF to our fishing industry. I don't like the position that not postponing this meeting puts my family in.

Is the State of Alaska irresponsibly hosting a super spreader event and forcing Alaskans to choose between protecting their health or protecting their livelihood?

Ceri Malein



Here are my Comments on Proposals to the BOF that effect my industry.

Proposal 80: Support

In-season Management is the way to go. ADFG has already been successfully managing this way since the new 2019 treaty deal.

Proposal 81: Neutral

Using in season management all gear groups should design their fishery to enabled them to catch their allocation. If all gear groups are in agreement, allowing Trollers to mop up most of the remaining treaty Chinook quota is preferable to leaving fish on the table. Leaving fish on the table tells the Pacific Salmon treaty folks that Alaska's quota was too large and negatively effects the algorithms in the treaty model.

Proposal 82: Support with amendments

If I understand the language correctly the Board should instruct ADFG Sports Department to continue using in-season management. They have been doing this successfully since the new treaty of 2019 and have not gone over allocation. With faster recording (electronic log books) there is potential room for improvement.

The requested amendment to Proposal 82, which I support, is to give Resident sport fishermen priority over non-residents.

Proposal 83: Oppose

When this proposal was submitted, SEAGO's President and Vice president were the Sport Industry's representatives on Alaska's Northern Panel of the 2019 treaty team. In this forum they agreed to in-season management with a payback clause.

All gear groups must now adjust their management to maximize their harvest without going over their allocations because of the 2019 Agreement. If one gear group is permitted to average their catch over the years then this must apply to all groups. This is no longer practically possible. It is also impossible to catch 100% of the treaty quota every year and not go over. Since the payback clause was been enacted (2019) some Chinook have been left on the table for fear of going over. Therefore if one group is allowed to average their catch over the years other gear groups will lose out. Sport Management must make the decision of either having large Out-of-State annual bag limits in the spring with potential closures later in the year or a smaller spring Out-of-State Resident bag limit to protect the August harvest.

A smaller spring Out-of-State annual bag limit (i.e. instead of a 4 Chinook limit in 2021 when 1 or 2 could have sufficed) will have two positive outcomes;

- a) Less effort on our returning far north ranging King salmon that are now under Stocks of Concern management
- b) Allow sports fishing to remain open later in the year.



Proposal 84; Support

Resident preferential over non resident

Proposal 85; Support

Resident preferential over non resident

Proposal 86; Support

Resident preferential over non resident

Proposal 88: Oppose

Now is not the time to be massaging management plans when there are so many things in flux. Status quo with in-season management is the way to go.

- 1) On using the CPUE model to determine SEAK PST King quota. At the moment this is an experiment and will be addressed at treaty during the 5 year review meeting.
- 2) There is a law suit that is threatening to shut down all Southeast Alaskan King salmon harvest outside of three miles.
- 3) Then there's the SOC. If the time when trollers catch King salmon in the summer changes it changes the historic composition of the harvest.

Proposal 89: Oppose

Active permits will buy up the inactive permits first (presently there are around 300 inactive Power Troll permits). This proposal will increase gear in the water and hence increase harvest. An increased harvest will take troll harvest radically over their 61% commercial coho harvest allocation set by the Board of Fish. At present the Troll coho harvest average is 65%. Increase of gear could potentially increase catch and non-retention of king salmon and change the base line.

Proposal 91: Oppose

Same as on Proposal 88. Now is not the time to be massaging management plans when there are so many things in flux. Status quo with in-season management is the way to go.

- 1) At the moment using the CPUE model to determine the SEAK treaty King quota is an experiment and will be addressed at treaty during the 5 year review meeting.
- 2) There is an ongoing law suit that is threatening to shut down **all** Southeast King salmon fishing outside three miles.
- 3) Then there's the SOC, changing when trollers catch King salmon in the summer changes the harvest composition.



Proposal 101: Oppose

Hatcheries in SEAK have successfully supplied Salmon for all the public to harvest. This proposal hurts our local hatcheries.

Proposal 103: Oppose

Hatcheries in SEAK are managed responsibly and successfully supplied Salmon for all the public to harvest. This proposal hurts our local hatcheries.

Proposal 104: Support

Hatcheries in SEAK are managed responsibly and successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

Proposal 105: Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

Proposal 106: Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

Proposal 107: Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

Proposal 109: Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

Proposal 115: Support

The annual SEAK king quota is set on a model theoretically based on 8 ADF&G Statistical weeks of winter troll harvest (week 41-48). This is a new method to predict the post season Abundance index. At present the model is only correct 50% of the time and often starts in week 42. By changing the winter start date to week 41 rather than Oct 11 a consistent number of days will be used rather than a random variable between 46- 53 days. The goal is to improve the accuracy of the model, comply with the Pacific Salmon Treaty language while not causing gear conflicts and not impact SOC which by October have already spawned.

Proposal 121: Oppose

Gillnets have always fished here traditionally. In the past there was no problem. Change came when new and inexperienced boaters have difficulty navigating. These rookies should respect traditional fisheries, learn the rules of the boating road, and comply, rather than expect others to change long established traditions to compensate for their lack of experience.



Proposal 143: Support

Making electronic logbooks a requirement for all non-resident anglers is essential to the future of our fish stocks. There has been a growth of **corporately owned lodges** who entice their hoped for benefactors, patrons and customers with all-expense paid trips to Alaska (Golf courses on the ocean.) This type of harvesting is unrecorded. Electronic logbooks are an efficient method for collecting fish harvest data that is imperative. This will enable ADFG to have in-season, sustainable management. Without good data there is no good management.

Proposal 144: Support

Making electronic logbooks a requirement for all non-resident anglers, including bareboat Charters and “non-rentals” is essential for the future of our fish stocks. Not only is it an efficient tool for collecting necessary fish harvest data it educates by pro-actively engaging visitors in Alaska and in helping the Department in conserving and monitoring our fish stocks. This will help enable in-season and sustainable management. Its Good PR too.

RC 6 Northern SE Stocks of Concern

Support option A Status quo for commercial fisheries

Trollers have given up a tremendous amount of fishing time and area including most of our access to hatchery King Salmon which we pay for. More closures will result in a closed Troll fishery. The good news is the previous sacrifices are paying off. The Unuk and Chilkat are improving.

Concerns do arise on the spring increased annual non-resident sports bag limit which coincided with reduced creel sampling in the Cross Sound/Icy Straights corridor. More sampling data is needed for a better picture on what is happening there.

RC 7 Stikine and Andrews Creek Stocks of Concern

Support Option A, Status Quo for commercial fisheries.

Here too Trollers have given up a tremendous amount of fishing time and area including most of our access to hatchery King Salmon which we pay for. Any more closures will result in a closed Troll fishery. The good news is, these sacrifices are paying off, the Unuk and Chilkat are improving.

Concerns arise on the spring increased non-resident annual sports bag limit. There is no creel sampling at the many private docks where guided sport boats return to throughout SEAK. This includes western Sumner Straights, and lower Chatham Straights, a Stikine SOC corridor. Presently because of inadequate creel sampling it's unclear what stocks are being caught in the guided and unguided sports industry. More data is needed for a better picture on what is happening.



Submitted By
Chandler O'Connell
Submitted On
12/22/2021 3:26:28 PM
Affiliation
Self

Support: 156, 157, 158

Oppose: 159, 160, 161, 164, 165

The herring are foundational and irreplaceable to the Lingit culture, local subsistence, and the well-being of other critically important species, including many that are commercially utilized and have a significantly greater impact on the Southeast economy than the sac-roe fishery does. Simultaneously, we know that the current herring population in Southeast is far smaller than what it was prior to the reduction fishery, that the spawn and subsistence egg harvest in Sitka has been inconsistent and challenging, with many years where the minimum amount necessary for subsistence users has not been met, and that climate change, disease and pollution are growing threats that will have unknown consequences for this invaluable fish.

Given this, I believe that herring should be managed extremely conservatively. Moreover, I believe that there should not be a commercial sac-roe fishery on the herring in Sitka Sound.

I urge the Alaska Board of Fisheries to respect the rights of Indigenous people to practice their way of life and to food sovereignty. Please take proactive action to promote herring abundance and stewardship of the herring for generations to come.

In regards to the specific herring proposals on the agenda for the January 2022 meeting, please consider the following pieces of information, included below:

1. Rationale for supporting and opposing proposals
2. A December 16, 2021 news release from Fisheries and Oceans Canada which speaks urgently to the extraordinary conditions facing Pacific fisheries and coastal communities, including the decline of wild Pacific salmon and natural disasters impacting fish habitats, and announces a more cautious approach to Pacific herring management: "This approach will see most commercial fisheries for Pacific herring closed, and limited to First Nations food, social and ceremonial fisheries. For the Strait of Georgia, harvesting will be reduced to a 10% harvest rate, with a maximum total allowable catch of 7,850 tonnes." **I urge the Alaska Board of Fisheries to heed this precedent.**
3. A January 22, 2018 opinion piece by science writer Charles Wohlforth that ran in the Anchorage Daily News and speaks to the history of herring in Alaska, our inability to bring back herring stocks after collapse, and the need to manage herring in the context of the ecosystem. **His words are as relevant now as they were in 2018 and I hope you will keep them in mind as you weigh your decisions.**

Thank you for your public service.

1. Rationale for supporting and opposing proposals

Proposals 156 - Please Support. This proposal would implement the herring harvest control rule that is used in all areas of Southeast Alaska to Sitka Sound, creating a more gradual curve (less aggressive) to the maximum harvest limit and is intended to conserve the herring when they are at low abundance and increase opportunity for subsistence users to meet their needs. I support this goal and think this proposal is a reasonable move.

Proposals 157 and 158 - Please support. The Sitka Tribe of Alaska and Lingit leaders have long shared Traditional Ecological Knowledge that testifies to the importance of larger, older herring to population health and successful spawning. These proposals would provide additional protections to older fish and could help to limit targeting of older fish by the commercial industry.

Proposal 159 – Please oppose. Regulation 27.195 is to ensure that subsistence users have a reasonable opportunity to harvest the amount of spawn necessary for subsistence. I think this regulation is very important. If any action is to be taken here, I believe the best step would be to strengthen these words, not to remove them.

Proposal 160 – Please oppose. The rationale for this proposal is flawed. There is no indication that the closed area has hurt commercial fishing – indeed, 4 of the 8 years ever since 1979 in which the commercial fleet has harvested greater than 12,000 tons of herring have happened since 2012 when the core subsistence only area was established.

There was significant public testimony in support of expanding the closed area in 2018, because of the compelling need for more protections for subsistence access. Reversing this without extremely strong cause is a mistake. I also point to Traditional Ecological

Knowledge that prescribes staying quiet on the water so as not to disturb the spawning; I value the larger subsistence-only area for the chance that it can provide some relief from the loud competitive fishery.

Finally, I think it is disrespectful for the Southeast Herring Conservation Alliance to minimize in their proposal the subsistence needs of the many people and communities who must now depend solely on Sitka Sound herring in order to access eggs, a staple food for thousands of years.

Proposal 161 – Please oppose. The barriers for subsistence harvesters are already significant. Challenges facing subsistence harvesters include needing money for fuel, access to boats, dealing with increasingly unpredictable spawn that requires folks to drop everything or be able to leave work, spawn in hard to reach areas that require more money and time to reach when previously it was all throughout Sitka Sound, variable quality spawn that means the same amount of effort may result in less eggs harvested, state-wide dependence on the Sitka population, lack of access to necessary traditional knowledge because of reduced opportunity to participate in the harvest, loss of access due to the commercial sac-roë fishery and more. I do not think the state should create another barrier to participate in this sustainable practice that has happened here since time immemorial.

Proposal 164 - Please oppose. I am unsure of the impact of this proposal, but I fear that there is potential that it would increase pressure on the herring. I am concerned about the impact of catch-and-release test sets on herring morbidity and mortality and think expanding the fishing window in an equal-share quota system could increase the number of test sets completed. A longer fishing window could also lead to more pressure on older, larger herring. Finally, I don't think it is a good idea to allow permit holders to overfish their quota by up to 10% in one year (with a subsequent reduction the following year). Catching more herring earlier doesn't just remove those specific fish from the water, it also removes the chance of those fish spawning for this year and all future years. A reduction in quota the following year doesn't necessarily make up for the lost year of reproduction potential for the extra fish harvested previously.

Proposal 165 - Please oppose. I think we should leave more herring in the water and therefore don't support expanding the opportunity to harvest uncaught sac-roë herring quota in a winter food and bait fishery.

1. Fisheries and Oceans Canada News Release

<https://www.canada.ca/en/fisheries-oceans/news/2021/12/fisheries-and-oceans-canada-updates-pacific-herring-coast-wide-harvest-plan-for-2021-22.html>

Fisheries and Oceans Canada updates Pacific herring coast-wide harvest plan for 2021-22

December 16, 2021

Vancouver, BC - Fisheries and Oceans Canada (DFO) supports fishing opportunities for communities, and is firmly committed to the conservation, protection, and regeneration of our marine environment and the lifeforms they sustain. Herring are a forage fish, an important food source to other keystone species like Pacific salmon, and a critical part of the ecosystem on the Pacific coast. It is vital that we manage Pacific herring with an approach that supports fishing allocation where possible, and one that is consistent with the objectives of stock recovery, and the regeneration of this important species.

Today, the Honourable Joyce Murray, Minister of Fisheries, Oceans, and the Canadian Coast Guard, announced a more cautious approach to Pacific herring management, based on recently intensified risks to wild salmon, for which herring is an important food source. This approach will see most commercial fisheries for Pacific herring closed, and limited to First Nations food, social and ceremonial fisheries. For the Strait of Georgia, harvesting will be reduced to a 10% harvest rate, with a maximum total allowable catch of 7,850 tonnes.

DFO will soon release the draft Integrated Fisheries Management Plan (IFMP), which outlines the scientific projections and proposed management measures for the upcoming season.

This decision was taken with the aim of providing sustainable fishing opportunities and increasing stock abundance, to the benefit of the entire ecosystem. This approach extends the cautious approaches taken in recent years, with additional limits on harvest, and considers the decline of wild Pacific salmon, and the impacts of the recent floods and landslides on fish habitats in British Columbia.

Pacific herring are an important food source for salmon, sea birds, marine mammals and other fish species. Maintaining a healthy herring stock is vital to the health of the ecosystem of coastal British Columbia, and this year's harvest plan will continue to conserve, protect and regenerate herring stocks for the future.

Quote

"When managing our fisheries, we have to consider the local fish harvesters and the long-term health of the entire ecosystem. This is an extraordinary time, when our Pacific Coast is reeling from natural disasters, and the serious damage they have caused to the environment and our iconic Pacific salmon. Herring are vital to the health of our ecosystem, and the stocks are in a fragile state. We must do what we can to protect and regenerate this important forage species." - The Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard

3. Charles Wohlforth Opinions Piece Anchorage Daily News

<https://www.adn.com/opinions/2018/01/22/forget-the-circle-of-life-in-this-fisheries-decision-we-are-playing-for-keeps/>

Forget the circle of life. In this fisheries decision, we are playing for keeps.

By Charles Wohlforth

Published: January 22, 2018

Life doesn't go in a circle. Nature is always changing and it never comes back to exactly where it was. That's why what we do matters.

An example is the climate, which we are changing by burning fossil fuels, and the resulting northward march of the ranges of plants, animals and bugs.

The spruce bark beetle plague has made it north to the Alaska Range. We will never again live the reliably cold, snowy winters or that I remember in Anchorage 40 years ago.

Change is not so obvious in the ocean, but we can also permanently transform the magnificent and incomprehensibly complex marine ecosystem. We have done so in many places.

A century ago, herring swarmed Kachemak Bay in enormous schools that took half an hour to pass. In 1926, a biologist recorded the crazy scene in Halibut Cove Lagoon, as 50 beluga whales fed on a roiling, flashing school of fish.

"Cormorants, murre, surf scoters, and divers were there in tens of thousands, and scores of bald eagles were circling about," he wrote.

Those schools were soon fished out. They never came back.

No one alive remembers that circus of life. The packs of belugas that chased the herring run up the bay are gone, too, recorded only in local histories.

We don't know what else is missing. The machinery of the ecosystem is too complex.

Herring perform a critical role as a conduit of energy—calories—from the plankton they eat to their predators, including salmon, halibut, birds and whales. Along with obscure little fish such as sand lance and smelt, they provide forage for a vast array of creatures.

If you pull the fuel line out of a car, it won't go. But ecosystems have alternative energy routes. Kachemak Bay life survived after herring, perhaps with larger runs of the other forage fish species.

It might take decades until one of those species has a bad year and food isn't available for salmon and halibut. Then we would all scratch our heads and wonder about the bad fishing year, assuming it is a natural phenomenon, never thinking of herring.

This didn't happen only in Kachemak Bay. In the early 1980s, mismanaged commercial fishing knocked down several herring runs in Southeast Alaska that never came back.

In Prince William Sound, a rich spawn of herring in the spring of 1989 occurred amid the oil spilled by the tanker Exxon Valdez. Four years later, the run collapsed and never recovered.

The rational conclusion is that herring runs don't come back once damaged, at least not in time spans human beings are used to waiting.

The great numbers in these huge runs probably provide protection from predators. Without those swarms of fish, the few individuals left are easy pickings.

There's nothing we can do to build them back. We can't make herring swarms. Even a century without fishing may not be enough.

This week, the Alaska Board of Fisheries will decide the fate of the last great commercial sac roe herring fishery in Southeast Alaska, the famous spring explosion of life that happens in Sitka Sound.

Alaska Native groups have asked the board to reduce the commercial catch and create conservation zones around subsistence areas to exclude commercial harvest. The Assembly of the City and Borough of Sitka and the local Fish and Game Advisory Committee support the concepts.

Alaska Natives have stepped forward as protectors of the herring run because herring eggs are a traditional food used at celebrations. For countless generations their people have lowered spruce branches into Sitka Sound upon which herring lay eggs.

Years ago, I joined Chugach Natives who were gathering herring roe from kelp in Prince Williams Sound. The eggs are the essence of fresh, salty goodness, translucent, better than caviar. I can still feel them popping between my teeth.

Sitka Natives have been unable to fulfill their subsistence needs for roe five of the last seven years. But even as the run declined, a commercial fishery has continued stripping roe for sale in Japan, sending herring flesh to the grinder for use in fish farms.

It's a cultural and spiritual issue for the Natives, who face the permanent loss of an ancient practice. It's like no more turkey for Thanksgiving—forever.



Biologists for the Alaska Department of Fish and Game say they have done a good job of managing the fishery. Although the run has declined from a peak six years ago, their data show herring numbers are still above average over the long span of measurements.

It's possible, they say, that the herring are spawning away from where the Sitka Natives are looking for them. Spawning areas change.

But Natives say that's not true. Aaron Bean, an Assembly member who has worked on these issues for years, said he has a fast boat and knows how to find the spawn, and he can no longer get the eggs he needs.

In 2013, Bean asked the Board of Fisheries to add herring to a list in Alaska's Forage Fish Management Plan, which outlaws commercial fishing for these keystone species—although herring would be specifically excluded from that restriction.

"It's in the best interests of the fishermen that the fish in the ocean be able to eat," Bean said.

The board voted down calling herring what it is—and no one can dispute it is a forage fish.

I don't doubt that Fish and Game has managed herring well using the tool they have, a computer model that predicts the maximum sustained yield based on dive survey data.

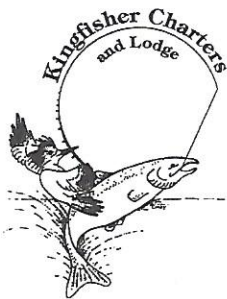
But Bean and his tribespeople are right. Maximum sustained yield is not the right equation.

Herring must be managed in the context of the ecosystem, considering their changing food supply and the species other than humans that eat them. Climate change has warmed the water, affecting plankton, and whales have multiplied in Sitka Sound, consuming herring.

The old rules of thumb may not work anymore. And getting it wrong just once could be permanent.

We can't afford more losses like that.

Charles Wohlforth was an Anchorage Daily News reporter from 1988 to 1992, and wrote a regular opinion column from 2015 until January 2019. He is the author of a dozen books about Alaska, science, history, and the environment.



Kingfisher Charters & Lodge

P.O. Box 1043, Craig, Alaska 99921 • (907) 826-3350



PC070
1 of 1

Board of Fish Ketchikan

Proposal 82-Opose; Proposal 83-Support

Dear Board Chairman and members,

I am owner and operator of Kingfisher Charters in Lodge, LLC in Craig Alaska. I have been in the sport fishing industry since 1990 and began our family run lodge in 1995. It has been 31 years since I started in the charter fishing industry and much has changed since then. Over the years we have seen the industry grow from a few to many which is the nature of Alaska's history, "boom to bust". As the sport fishing industry has grown the communities they support have also grown to need the jobs and dollars they bring to small communities like Craig, Thorne Bay, Klawock, Coffman Cove, and Whale Pass on Prince of Wales Island.

The years 2008 and Covid year 2020 we saw the financial depression of those communities when many non-resident sport fishermen did not come to the state. ADF&G surely saw their coffers empty without those non-resident sport licenses and King salmon stamps being purchased.

The sport charter industry needs the state to bring stability to the sport charter industry. We in the sport charter industry are asking for this stability which proposal 83 comes the closest to fulfilling this need.

From my experience in the industry in our area for King salmon we need:

1/3 January 1st to June 30th; 1/2 July 1 to July 30th; 1/1 August 1st to August 10th.

After further study I am against **Proposal 82** as I believe it will continue to keep the sport charter industry unstable with limit fluctuations. The new approach specifies sport allocations by tier instead of an 80/20 split between sport and troll over time and across tiers. It reduces the harvest opportunity for the sport industry in low abundance years. Sport management in prior plans, allowed sport to exceed 20% during low abundance and Troll to exceed 80% in high abundance years.

Proposal 83 comes the closest to bring stability by returning the management back to earlier mechanics and clearly define it in regulation.

I respectfully ask the Board to adopt **Proposal 83** or as close to possible and define it in regulation.

Sincerely,

Charles Haydu (info@alaskakingfisherlodge.com)

Submitted By
Charles Olson
Submitted On
12/20/2021 3:04:05 PM
Affiliation



PC071
1 of 1

Phone
907-738-3947
Email
crolson48@hotmail.com
Address
3009 Halibut Point Rd
Sitka, Alaska 99835

Mr. Chairman and Board Members:

I am writing to Support Proposals 163, 164, and 165.

We have all been to enough Board meetings to know that it isn't very often that a proposal is designed to benefit all parties instead of just one. But proposal 163 is one that can benefit everyone associated with the herring resource in Sitka.

My name is Chuck Olson and I am what most people would call an Elder fisherman. I'm 72 years old and I have participated in the Sitka Sac Roe fishery for the past 42 years. I have witnessed the consistent improvement in the strength of the stock of Sitka herring due to the excellent management of the fishery. But I have also witnessed a fishery that is dangerous and destructive and expensive for all of those persons involved.

The Board has seen this proposal before. It has been brought before the Board several times in the past because it just makes good sense. There are three major concerns that keep coming up when we discuss the Roe herring fishery; Conservation, the cost of monitoring and conducting the fishery, and the issue of Safety. Several of the other proposals address the concerns of those who would conserve the herring stocks by limiting or restricting the fishery. The State of Alaska spends a lot of money to assess and prosecute the fishery. The Coast Guard and Enforcement also spend a lot of money to see that the fishery is somewhat orderly. And then there is the issue of safety. I have witnessed vessels ramming each other and running over each other's nets in the attempt to catch the fish.

All of these problems can be fixed by simply creating a fishery that is equally shared by all of the permit holders. In an equal split fishery the permit holder can choose when and how he wishes to catch the fish or can even decide to not catch any fish at all. Those fish would remain in the water to spawn. Imagine if the Tribe or some other Conservation minded individual decided to buy several permits and not catch the fish assigned to those permits. Those fish would then spawn thereby adding to the conservation of the resource and be that much more roe to be deposited on the branches and kelp for the subsistence fishery. In an equal split fishery there would not be the need for as much Enforcement presence and involvement by the Coast Guard. I have never seen a collision or a net being run over in a cooperative fishery.

To have an equal split fishery the resource could be further conserved, the fishery would be less expensive to conduct, and it would be less destructive and safer for all persons involved. For all of these reasons the Sitka Fish and Game advisory Council overwhelmingly supported this proposal.

Further I would support Proposal 164 or some combination of Proposals 163 and 164 that the Board might find acceptable to them.

In addition I support Proposal 165 as amended by the Sitka Fish and Game Advisory Committee that would allow the Harvest of Herring for food and bait in Sitka Sound north of Cape Aspid and south of Kakul Narrows. This harvest would come out of the unharvested portion of the GHL from the Sitka Sound Roe Herring fishery. Preferably the harvest would be limited to the holders of a G01A herring permit and would be conducted in the months of October, November and December of the year of the Spring harvest of Roe herring.

Thank you for your consideration of these proposals.

Charles Olson

Submitted By
Charles Skeek
Submitted On
12/22/2021 1:45:25 PM
Affiliation
Sitka Herring Permitholder



PC072
1 of 1

Board of Fish Committee,

First of all, I would like to thank the board for taking the time to read everyone's comments as I can understand there have been several submitted. So thank you for time. I am writing my comment in regard to Proposals 163 and 164.

I would like to remind you all of ADFG's management of the fishery thus far and how much their science has sustained this fishery and the health of the biomass. We have witnessed the second largest spawn on record since ADFG had started recording, and by all means next year's number could possibly exceed that. We'll see. What we are witnessing is a thriving biomass and I would like to applaud ADFG for their management. All this said, I do feel the need to point out that this fishery is thriving so much, that there is an excess to market demand. Never has this fishery had such an excess that they do not need the entirety of the quota.

At this time, I do see sense in moving this fishery to an equal split management. Safety was mentioned as a reason and I can see the sense in that as that's been repeated over the years. I believe a management of this style will continue to move us into a direction of responsible harvesting. I believe it's been explained of the many benefits a season like last year has brought to processors as they were able to streamline operations at a capacity that never stopped for nearly two weeks. That just doesn't happen often in a competitive style fishery. Costs and expenses in this fishery should be considered by the board as the money earned in this fishery, if it stays in the state, benefits the state of Alaska.

On more tokenized note, I see the need to make it apparent that I am an Alaskan native. I am half Tlingit, and a second generation permit-holder of this fishery. My father Leonard Skeek was an original permit holder, and it is my desire to see that this fishery continues for more generations in our family. I do notice there are two other natives on the Board that I hope this letter reaches specifically, and my advice to them might come off as a bit harsh, but BoF meetings only come every couple of years. I remember attending my first BoF meeting in Ketchikan in 2011, I believe. I feel like I made some great comments then which I'm sure have been mostly forgotten. What I would like to remind the new board members of is some of the reasoning I heard state by some of the board members then as to why they decided to go ahead and vote in more closed area for the fishery. I'm not saying it was this particular reason, but it was stated that a young guy like myself who was able to profit off a very successful season in 2008 should have less worry about the loss of more area or shouldn't worry about more restrictions in the fishery. That statement alone should pause the two of you for a moment.

I have participated in this fishery for nearly 30 years. Nearly 30 years I have committed to this way of life as a commercial fisherman. And I did it as an Alaskan native. My father raised me in this lifestyle because he admired it and saw opportunity in it. In short, he had respect for this way of life. He also had a deep respect for cultural traditions and he ALSO raised us with subsistence traditions. So before any decisions are based on virtue signaling Alaska natives, I need to remind you of the people involved in this fishery. Though it is mostly irrelevant in my day to day life, I feel the need to point out the amount of natives that do support a living in this fishery. Permit holders, tenders, processors, restaurants, hotels, pilots - in some way or another money from this fishery supports Alaskan natives. But to base decisions as they were possibly done in 2011 where the natives involved in this fishery were viewed as well-off, and as a result could afford to lose a little, is an insult. If I could speak even more freely, if you're going to disregard the natives in this fishery this way, I do suggest that you find ways to compensate them as you are taking from their livelihood. My father entered this fishery in the late 70s on a level playing field of opportunity and it should not be disregarded as to what we've done to hold onto this permit for as long as we have. I think Alaskan natives should be working hard with what they do. Commercial fishing has provided that for me. For the board in general, if you're going to vote on the principal of giving back to Alaskan natives, and taking from others, maybe be so bold as to provide a greater direction in life for the Alaskan natives as you take away their livelihoods with decisions that keep chipping away at commercial fishing. Future generations of natives should be welcomed and introduced to the work ethic that this industry offers.

I sincerely write this letter as my own, as I am not a member of the Sitka Herring Conservation Alliance.

Submitted By
Charles Treinen
Submitted On
3/1/2021 10:41:30 AM
Affiliation



PC073
1 of 1

Doubling up on the meeting schedule for the 2021/2022 meeting cycle puts an undue burden on the public that will limit and compromise the public's opportunity to participate in a given meeting. It also puts an undue burden on the department to produce more complete analyses when we need them to deal with day to day management issues.
Please consider the reasonable option of setting the whole schedule back by one year.

Submitted By
Cheryl Haven
Submitted On
12/13/2021 7:11:16 PM
Affiliation



PC074
1 of 1

Phone
19072207477
Email
shinghet@gci.net
Address
1170 Black Bear Road
Ketchikan, Alaska 99901

As a 73 year old Alaska Native woman, I fear that without better protection, we may not even have a herring return one day soon. To me, herring are like the bees on this planet which are vital to our food sources - herring is the same thing, vital to our food sources. Please follow the advise of the 'Herring Protectors' of Sitka because they have spent a lot of time and worked hard to come up with a proposal guide. Thank you.

Sincerely

Cheryl Haven

Submitted By
Chiara Dangelo
Submitted On
11/16/2021 6:29:52 PM
Affiliation



PC075
1 of 1

Phone
2067073614
Email
ChiaraLoveswater@gmail.com
Address
9642 N Douglas Hwy
Juneau , Alaska 99801

Herring are the backbone of the traditional way of life of indigenous communities of southeast Alaska. One bad year and it could be game over for the future of our herring. Elimination of the Sitka runs is not an option. Please support Sitka Tribes proposals.



From: [chris guggenbickler](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Chris Guggenbickler](#)
Subject: Southeast and Yakutat fin/shellfish proposals
Date: Wednesday, December 22, 2021 2:17:02 PM

Comments on proposals 171,172,173,174

As someone who is dependent upon and has participated in the pot shrimp fishery for 39 consecutive seasons, I would like to relay my adamant **opposition** to these proposals to change the current spot shrimp season to a spring fishery. I happen to have a contrast to the departments position that a spring season would increase the harvestable amount of shrimp in the pot fishery.

First off shrimp harvested in a spring fishery would not be egg-bearing in the fall because we would have already caught them in the spring! They would not have had the opportunity to spawn anyhow.

It will take more individual shrimp to reach the same guideline harvest levels due to the added poundage of roe recovered in the fall season. (which is sought after by some markets) Ambient air temperatures are considerably higher in the spring than in the fall which would negatively affect the market quality of the shrimp, and more importantly would increase mortality on sub market sized shrimp being returned to sea.

- Many of the markets I sell into peak around the holidays and an October fishery aligns better in timing and quality for that market.
Shrimp in the spring have light shells which freezer burn quickly, this quality issue would
- reduce the value of the harvest.
Shrimp in the spring are more spread out and seasons would likely take longer to reach
- guideline harvest levels, for those with multiple crew and generators running freezers the expenses associated with a longer harvest would negatively affect profits.
As pot shrimp is considered a supplementary fishery, seasons will have more likelihood in the
- spring of conflicting with crab, troll and gillnet fisheries.
It seems unreasonable to assume personal use/sport/subsistence users would want the
- commercial fishery conducted just prior to summer when most personal use/sport/subsistence fishermen are on the water.
- This truly is an allocative proposal away from those that have historic catches in the fall fishery.

Many of the departments comments for managing other fisheries reference CPUE for a reason they are not comfortable with a management shift, yet without a comprehensive plan or substantial prior test fishing seem to leave that reasoning out on these proposals. Furthermore there has been no discussion as to how this shift would be conducted, would there be a fishery in October and then the following spring, or would fishermen have to wait 18 months until they had a source of income in this fishery again? How would either one of these options create a sustainable, yet larger harvest for shrimp fishermen and the users of the State? Still opposed!

Thank you for consideration on this issue

Chris Guggenbickler
F/V Noelani, Wrangell AK

Submitted By
Chris Stewart
Submitted On
12/16/2021 1:53:36 PM
Affiliation



PC077
1 of 1

Phone
451-279-9505
Email
cseptyhand@yahoo.com
Address
885 32 Ave.
San Francisco, California 94121

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

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

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

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

Submitted By
Christine Woll
Submitted On
12/22/2021 8:50:28 PM
Affiliation



PC078
1 of 1

Phone
3397931835
Email
christine.L.woll@gmail.com
Address
1300 Mendenhall Peninsula Rd
Juneau, Alaska 99801

I am writing to support measures put forward by the Sitka Tribe of Alaska and Herring Protectors. I have a masters in fisheries from UAF and have lived in Southeast Alaska for almost a decade. The truth is herring used to spawn in so many areas across Southeast and all but a few remaining events remain. More of the same management won't work; we need to try new conservation approaches that rely on the wisdom of the people who managed these resources for thousands of years without eradicating their resources.



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

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

My name is Chuck McNamee. I began working in the sportfishing industry in Sitka at the age of 19 in 1993. In 1996 I became a captain working for Angling Unlimited. Over the years, I became a full partner in the business. In 2021, I put my family's future on the line and finished a buy-out of the retiring founder of Angling Unlimited. Our business employs over 25 workers in season. We have captains who own their own boats, live in Sitka, and support their families on their earnings from guided sport fishing. We also own boats with hired captains.

We buy the overwhelming majority of our supplies locally. We purchase our fuel from the local dock and the local mechanic repairs, maintains, and provides parts for our engines and drives. Our business helps support the Sitka tax base via a 6% sales tax, a bed tax, and a fish box tax. We don't serve dinner to our guests who either spend money at the local grocery store to cook in or go out to the restaurants in Sitka.

Kings are the premier sportfish because of their size and fight. Not a single guest gets aboard our boats who doesn't hope to catch and keep a king salmon. These are one of the greatest eating fish on the planet. We are especially dependent on kings to market our season in May and June when other salmon species aren't available. The promise of a king in July and August remains important in attracting customers. A mismatch between that dream of a king that attracts a customer and a sudden regulatory change tends to leave a sense of uncertainty that threatens the return business we so heavily rely on to keep our lodge full and contribute to the local economy.

The past two seasons saw king salmon regulations swing wildly from ever increasing bag and annual limits in 2020 to a complete closure in 2021. A level set of regulations would work much better for our customers and allow for the Alaskan fishing experience to match the expectations they have when booking. We don't need super high bag and annual limits during high abundance. We do run into real disappointment when the regulations change suddenly downward in season when abundance may be lower.

We at Angling Unlimited do not support Proposal 82. We're concerned about the impacts of lost opportunity for non-residents to retain kings in low abundance under this proposal. While we understand that in season management is an attractive management tool, we see it as a very last resort due to the destructive marketing impacts on customers who don't want to invest in a trip with highly uncertain opportunities. Building and maintaining a stable business that predictably supports local jobs, tax bases, and economies requires suitable and stable limits at all abundance levels.

We support Proposal 83 which provides workable regulations in low abundance and avoids in season management. We prefer long term stability in regulations to a whipsaw up and down chasing high abundance with liberalized regulations which our customers don't require, followed by highly restrictive limits or unexpected closures in low abundance. The commitment of money, time, and travel our customers make is undermined with overnight regulation changes. We feel a regulatory regime that creates greater certainty will help Angling Unlimited continue to employ workers in Southeast and support the local economy.



Additionally, we support allocating enough king salmon to the sport fishery to assure resident access throughout the season at all levels of abundance. We believe Proposal 83 will do a much better job of assuring resident access while providing enough opportunity for non-residents. The direct benefit to the resident angler to harvest kings should be assured. We also feel the board should consider the benefits non-resident harvest provide to countless residents of Southeast Alaska in jobs, expenditures in local businesses, and the tax base of the communities. Proposal 83 does a better job of addressing all these considerations.

We trust the Board will find a fair and creative solution that serves all groups that depend on the precious king salmon resource with workable regulations during low and high abundance. Such a solution serves those in each user group and they will ultimately provide the maximum benefit of this resource to the State of Alaska.

Thank you for taking my comments into consideration.

Chuck McNamee

Submitted By
Cindy E Stiles
Submitted On
12/22/2021 10:04:53 AM
Affiliation
Tlingit tribal member



PC080
1 of 1

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

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

Pacific herring are a keystone species, which salmon, sea mammals and other marine wildlife depend on, yet I don't think that our current policies reflect Herring's role in our oceans as a forage fish. This significant position that the Herring hold in the ecosystem needs to be carefully addressed with care and nuance.

I believe we must go even farther if we are going to protect Herring populations for the future generations.

Sincerely,

Cindy Stiles

Tlingit tribal member/Sitka Native

Submitted By
Cindy Wagner
Submitted On
12/19/2021 3:30:25 PM
Affiliation



PC081
1 of 1

Phone
9076171866
Email
ooligan@hotmail.com
Address
POBox 369
Metlakatla , Alaska 99926

For generations, the Alaska Department of Fish & Game has proven itself to be incapable of managing any fishery, particularly the herring and ooligan fishery. Their management of these particular fisheries have been devastating to Native communities that depend on them. At least two generations of Native peoples have not tasted ooligan. Kah Shakes and Cat Island were always productive for herring eggs for the Native People, Behm Canal had a small herring spawn. Hobart Bay and Seymour Canal were also herring spawn areas, all gone from overfishing, i.e. poor management. None of these areas have recovered. Sitka herring spawn needs to be allowed to recover. The People need to have a herring spawn in order to continue as they have for millennia. The People also need their ooligan. Start listening to the indigenous way of life.



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #93 dealing with the harvest annual limits for nonresident sport fishers in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

King salmon, like other traditional foods that inhabit our southeast Alaskan waters, is critically important to a lot of people that live here in Ketchikan. Relatively speaking, king salmon in our area is “easy” to access because we can harvest near our community during certain times of the year. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell

Lee Clere



Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeramiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #142 dealing with harvest regulations and guidelines for Ooligan (Eulachon) on the Joonax (Unuk) River. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Ooligan for generations have been critically important for our peoples culture here in the Ketchikan area, and for years we legally have not been able to harvest this traditional food in state managed waters. We would ask the Alaska Board of Fisheries to protect my rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

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Susan Lee Pickrell

Lee Clere



Hilary Rifenburg

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Trixie Bennett

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Kayla Williams

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Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens writing to you to express our support for Board of Fisheries proposal #146 dealing with harvest regulations and guidelines for nonresident sport fishing for salmon in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

By and large, all of our fisheries for all five species of Pacific salmon are experiencing high variability throughout the years which is concerning for the management of these fisheries. It is imperative that we manage this resource for sustainability while giving priority to the citizens of Alaska. We need more fish to escape to their natal streams such that they can contribute. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

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Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of writing to you to express our support for Board of Fisheries proposal #147 dealing with harvest regulations and guidelines for nonresident sport fishing for salmon in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

By and large, all of our fisheries for all five species of Pacific salmon are experiencing high variability throughout the years which is concerning for the management of these fisheries. It is imperative that we manage this resource for sustainability while giving priority to the citizens of Alaska. We need more fish to escape to their natal streams such that they can contribute. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn

Ivan Leighton



Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

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Simeon Cabansag

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Hilary Rifenburg



Karen Kennedy

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Erica R Hoff

Danielle Ludwigsen

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Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green

Torah Zamora



Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens writing to you to express our support for Board of Fisheries proposal #148 dealing with harvest regulations and guidelines for nonresident sport fishing for salmon in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

By and large, all of our fisheries for all five species of Pacific salmon are experiencing high variability throughout the years which is concerning for the management of these fisheries. It is imperative that we manage this resource for sustainability while giving priority to the citizens of Alaska. We need more fish to escape to their natal streams such that they can contribute. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

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Simeon Cabansag

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Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #156 dealing with commercial harvest rates of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We believe that this proposal is a valid and responsible way of assuring that these herring will be here for generations to come. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis



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Margaret Edais Yeltatzie

Jessica Miles

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Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #157 dealing with commercial harvest rates of various age classes of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We believe that this proposal is a valid and responsible way of assuring that these herring will be here for generations to come. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

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Erin Weis



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Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

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Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie



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Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #158 dealing with commercial harvest rates of Pacific herring with respect to size and age in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We believe that this proposal is a valid and responsible way of assuring that these herring will be here for generations to come. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis



Gloria Burns

Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

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Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #159 dealing with commercial harvest rates of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal disproportionately negatively impacts the subsistence harvesters of herring eggs. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

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Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

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Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #160 dealing with commercial harvest of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal disproportionately negatively impacts the subsistence harvesters of herring eggs. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn
Ivan Leighton
Mischa Chernick
Margaret Edais Yeltatzie
Jessica Miles
Naomi michalsen
Teri lee Tesk
Nadine Robertson
Michelle Y. Charles
Elaine Atkinson
Averie Archibald
Helene Simpson
Bonnie Morris
Beverly Chalmers
Elizabeth Rado
Simeon Cabansag
Julian Kvasnikoff
Grant EchoHawk
Lucas Ramsey
Riley Boss
Daniel Edenshaw
Byron Wallace
Maxx Keizer
Dawna L Hull
Sonya R. Klippert
Hal E Smith
Helene R. Simpson
Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeramiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #161 dealing with subsistence permit requirements of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal disproportionately negatively impacts the subsistence harvesters of herring eggs. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

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Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

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Any Guinn
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Averie Archibald
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Beverly Chalmers
Elizabeth Rado
Simeon Cabansag
Julian Kvasnikoff
Grant EchoHawk
Lucas Ramsey
Riley Boss
Daniel Edenshaw
Byron Wallace
Maxx Keizer
Dawna L Hull
Sonya R. Klippert
Hal E Smith
Helene R. Simpson
Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

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Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

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Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #163 dealing with commercial harvest quotas of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal has the potential to make the herring fishery in this area more unsustainable than ever before. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn
Ivan Leighton
Mischa Chernick
Margaret Edais Yeltatzie
Jessica Miles
Naomi michalsen
Teri lee Tesk
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Michelle Y. Charles
Elaine Atkinson
Averie Archibald
Helene Simpson
Bonnie Morris
Beverly Chalmers
Elizabeth Rado
Simeon Cabansag
Julian Kvasnikoff
Grant EchoHawk
Lucas Ramsey
Riley Boss
Daniel Edenshaw
Byron Wallace
Maxx Keizer
Dawna L Hull
Sonya R. Klippert
Hal E Smith
Helene R. Simpson
Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeramiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #164 dealing with commercial harvest quotas of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal has the potential to make the herring fishery in this area more unsustainable than ever before. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeramiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #165 dealing with commercial harvest of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal has the potential to make herring fishery in this area more unsustainable than ever before. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn
Ivan Leighton
Mischa Chernick
Margaret Edais Yeltatzie
Jessica Miles
Naomi michalsen
Teri lee Tesk
Nadine Robertson
Michelle Y. Charles
Elaine Atkinson
Averie Archibald
Helene Simpson
Bonnie Morris
Beverly Chalmers
Elizabeth Rado
Simeon Cabansag
Julian Kvasnikoff
Grant EchoHawk
Lucas Ramsey
Riley Boss
Daniel Edenshaw
Byron Wallace
Maxx Keizer
Dawna L Hull
Sonya R. Klippert
Hal E Smith
Helene R. Simpson
Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeramiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens writing to you to express our support for Board of Fisheries proposal #170 dealing with traditional and customary use designation for all beach seafood in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

The Indigenous people of southeast Alaska have been using shoreline for dietary and medicinal uses since our people have existed in this area. A saying in our culture that has been prevalent through time is “when the tide is out the table is set.” This is something that I hold in high regard in my life. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

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Sonya R. Klippert

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Susan Lee Pickrell

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Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #234 dealing with requiring for catch and harvest reporting for all sport fishing activities for all finfish and shellfish. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

The Alaska Department of Fish and Game needs every opportunity to make proper in season management decisions for the sustainability for all species within Alaskan waters. Having these records being reported by all nonresidents would be a major step in the right direction. To assure this happens, there needs to be some sort of impactful enforcement so that people are not neglecting providing this information to the managers. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

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Naomi michalsen
Teri lee Tesk
Nadine Robertson
Michelle Y. Charles
Elaine Atkinson
Averie Archibald
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Julian Kvasnikoff
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Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

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Danielle Ludwigsen

Katherine Evans

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Cheri Blair

Myrna Chaney

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Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthonny Chulik

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Shaun Dunkin

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Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele

Submitted By
Claire Manning
Submitted On
11/16/2021 7:49:37 PM
Affiliation



PC083
1 of 1

Phone
3609222167
Email
Cemanning0413@gmail.com
Address
477 s 21st pl
Ridgefield , Washington 98642

I am a teacher and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast.

Submitted By
Claire Sanchez
Submitted On
12/21/2021 10:05:55 PM
Affiliation



PC084
1 of 1

Phone
6308185960
Email
Sanchez.claire.marie@gmail.com
Address
504 Shennett st.
Sitka, Alaska 99835

Dear Board of Fish,

Due to herring's importance culturally, ecologically, and importance to subsistence users, I support Sitka Tribe of Alaska's proposals: 156, 157 and 158.

I oppose proposals 159 through 164, because they're harmful to herring and subsistence users.

Thank you,

Claire

Submitted By
Clyde Curry
Submitted On
12/22/2021 11:37:10 PM
Affiliation



PC085
1 of 1

December 22, 2021

Members of the Board of Fisheries,

My name is Clyde Curry, and I fished the Sitka herring sac roe fishery from the beginning. I started fishing in Alaska in 1963 and I finally fully retired in 2017. As a child, I grew up fishing on Lummi Island in Puget Sound at my family reef net operation. My brother and I began gillnetting salmon when I was 12, and by the time I was 16 we bought a boat and headed to Alaska. In 1966, we purchased our first salmon seine boat, the Puget, and fished it together in Southeast Alaska. I bought my own salmon seiner, the Louie G in 1968. In 1970, I married a local Petersburg fisherwoman, and we began building a business and started a fishing family.

My first experience with herring was on the tender Howkan around 1970 in Sitka, and at that time it was just a bait fishery. The season was just- open, so people could fish whenever they wanted- guys were too impatient to wait for the roe to ripen up, so it all went to bait for halibut. I went on the Howkan to Prince William Sound since the fishery up there was just getting started. I took my own seiner the Louie G to Sitka around 1972 or 1973 to fish herring sac roe in Sitka. After that, I also started fishing herring in Auke Bay, Seymour, Behm Canal and other areas. I fished herring in Ketchikan, Sitka, Juneau, Prince William Sound, Resurrection Bay, and Togiak. All those fisheries were managed differently than Sitka.

Sitka herring started as a small group of about five of us, and the fishery grew really fast after that. I was one of the initial issuants when the sac roe fishery went limited entry. When I first started going to Sitka before limited entry, I saw no effort to harvest roe on branches. When the sac roe fishery started there were many Alaska native permit holders. I can remember 9 off the top of my head. Later on, the native permit holders would harvest roe on branches to bring back to communities. That doesn't happen as much anymore.

I've watched the Sitka herring fishery go through ups and downs. There was NOT as much fish when we started the fishery as there is now. Past ADF&G managers can also tell you that I didn't always agree with the way they were managing the fishery. But that doesn't change the facts, that they keep the fish coming back. From the early 1970's to the early 1990's the biomass was small, nothing like it is today. After the Sitka pulp mill closed in 1993, I watched as the herring population really started to take off. Herring also got a lot bigger after the pulp mill closed. They were able to grow larger and live longer. Just look at the yearly graphs from the beginning of the fishery, and you'll see the increase in the size of herring and population after the pulp mill closed.

You're going to be asked to make changes to this fishery. Don't do it. We have already made big changes, and it's never enough. The compromises made only take away from the fishery. The people who want to shut the fishery down have already taken area away and they want to take more. They won't stop until they close the fishery down.

Thank you, Clyde Curry

Submitted By
Elsa Sebastian
Submitted On
12/22/2021 6:54:38 PM
Affiliation



PC086
1 of 1

Phone
8025952600
Email
elsa.m.sebastian@gmail.com
Address
2116 SAWMILL CREEK RD
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.

-Colin Arisman



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

I live in Ketchikan, Alaska, and I participate in the sport salmon fisheries of the Southeast region. I worked up here multiple times, now have moved here and will be a resident by next summer. Salmon is why I moved here because fishing in Washington state (where I'm born and raised) has been destroyed by lack of hatcheries. I moved here to follow my dreams of being a charter fisherman, thus fish is a direct factor in my livelihood.

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,

Connor Sorensen
connorsorensen97@icloud.com
(425) 301-5716

Submitted By
Courtney MacArthur
Submitted On
12/21/2021 7:20:27 PM
Affiliation



PC088
1 of 1

I support Proposals 156, 157 and 158, and I oppose 159, 160, 161, 163, 164 and 165.

Submitted By
Timothy O'CONNOR
Submitted On
11/12/2021 3:30:59 PM
Affiliation
Ata,troller, mayor of Craig

Phone
541-601-5941
Email
bestreekiller@msn.com
Address
Po box1225
Craig , Alaska 99921



PC089
1 of 2

Hatcheries are a critical part of Alaska fisheries, be it commercial, sport, substance or charter. They help support all of these industries, families communities and economy's in Alaska. As Mayor of Craig Ak.and a troller and substance fishermen, I'm very aware of the impacts our hatcheries have. We have grown our fleets in the Craig area and continue to expand opportunities here because of our hatcheries. The state salmon catch valued at over 650 million dollars in 2021 and probably over 1/2 of that was with the help of our hatcheries. We view them as critical inferstructur to our success as a community. Thank you for your time Tim O'Connor Mayor of Craig Ak. And fishermen.

Submitted By
Tim O'Connor
Submitted On
12/13/2021 10:58:32 PM
Affiliation
Mayor,ATA, Commercial fishermen



PC089
2 of 2

Phone
541-601-5941
Email
Mayor@craigak.com
Address
Po box1225
Craig , Alaska 99921

Our hatcheries are essential to the community's and the industry in Craig as well as subsistence way of life of the Tribes and people of Prince of Wales is.... our hatcheries contributions to our way of life and economy is essential to our communities. As mayor of Craig I am very involved in the support of our fisheries for economy. Our sport, charter , trolling, gillnetters and sainers all benefit millions of dollars and subsistence lifestyle.

Submitted By
Cristen Kimball
Submitted On
12/22/2021 3:27:27 PM
Affiliation



PC090
1 of 1

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

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

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

Submitted By
Daniel Cannon
Submitted On
12/22/2021 9:08:47 PM
Affiliation



PC091
1 of 1

Phone
4407244716
Email
dgc4306@gmail.com
Address
1420 glacier Ave
Apt 201
Juneau, Alaska 99801

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Submitted By
Daniel F Castle
Submitted On
12/22/2021 7:58:55 AM
Affiliation



PC092
1 of 1

Phone
9076175500
Email
castlefisheries@gmail.com
Address
4430 S. Tongass Hwy
Ketchikan, Alaska 99901

In general, the solutions offered in proposals 156, 157 and 158 are for problems that do not exist and I OPPOSE them. There are no allocation or conservation issues that the board needs to address at this time. If adopted, these proposals would eventually dismantle the fishery and deprive the fishermen and citizens of the state of a robust and valuable resource. As stated in each submission, total abolition of the fishery was considered to be an option and should awaken you to their true intention. Proposals 159 and 160 I SUPPORT. These proposals reverse decisions made by previous boards that attempted to solve other phantom problems. I agree that some shelter should be afforded to facilitate subsistence harvest, but expansion of the "core area" has done nothing and will continue to do nothing to help fulfill local needs. Commercial harvest can sometimes "spark" the beginning of a spawning event. By pushing the fleet away from town, the intense schooling needed for good branch coverage gets farther out of reach. In other words, the solution has backfired and only makes matters worse. I SUPPORT proposals 163 and 164. Adoption of the equal share concept will solve many economic problems and relieve difficulties that fisheries management must face yearly. EHS fishery will produce higher quality product, which in turn will deliver higher value to fishermen, processors and the State. EHS will eliminate destructive collisions and reduce insurance claims. EHS will also greatly reduce the heavy cost of management to the Department. In addition, EHS will reduce the impact that a competitive fishery has on the resource. An orderly fishery will promote more stability and enhance subsistence opportunities.



My name is Darell Welk. I own and operate Alaskan Fishing Adventures~Ketchikan. We have been running our family business for 27 years and live year round in Ketchikan. Our business is heavily reliant on king salmon to keep us operating. Changing yearly bag limits and mid season king salmon closures on low abundance years are making it increasingly difficult to attract and get guests to return to our state.

Imagine saving up all year for what is the family trip of a lifetime. After you buy your plane tickets they inform you that Disneyland is still open, however the rides are not. This is what we are having to explain over and over to these families. To find some sort of balance to our limits like proposal 83 offers will keep visitors coming back and spending their vacation dollars in our beautiful state. Prop 83 does a good job of providing opportunities for residents and nonresident anglers without extracting from but rather borrowing from other fisheries in low abundance years and repaying them back in high abundance years. My hope is that the board can come up with a fair tradeoff between king salmon user groups that benefit all. I believe prop 83 does this. Thank you for taking the time to read this. Darell Welk



December 21, 2021
Darrell Kapp

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

Re; Support for Proposal 166 and 233: An alternative gear for GO1A permit holders using open platform
Spawn on Kelp methods. And, remove districts 13A and 13B from L21A administrative areas

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

Attached is my letter to the Commercial Fisheries Entry Commission (CFEC) of February 26, 2020 that
sums up the dispute we are having with the CFEC.

Attached also:

1. the Certified letter to me, Darrell Kapp, from the CFEC dated February 27, 2020.
2. the letter of February 19, 2020 from CFEC to me, Darrell Kapp.
3. The letter of February 10, 2020 from Darrell Kapp to CFEC
4. A map of SE Alaska herring stock areas.
5. Seth Beausang Memorandum

Please review all the documents you received and ask the CFEC to remove districts 13A and 13B from
the L21A administrative area.

A third letter from the Board of Fisheries to the CFEC could be the push the CFEC needs. Once areas 13a
and 13B are removed, the BOF can allow the GO1A fishermen the choice of purse seining their herring
or doing an open pound alternative in areas 13A and 13B.

Best regards,
Darrell Kapp

A handwritten signature in black ink that reads "Darrell Kapp".



February 26, 2020

Fate Putman, Chairman
Dale Kelley, Commissioner
Commercial Fisheries Entry Commission
8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302

Dear Chairman Putman and Commissioner Kelley,

Thank you for your letter of February 19, 2020 and the accompany documents. We are disappointed in your statement, "we do not believe that a meeting at this time would be fruitful."

Looking at the "Chronology" document you sent us, we find the work titled "Open Platform Spawn on Kelp," by Phillip Mundy PhD, John Gissberg PhD, and Samuel Sharr BS, was not included. This was the first document we presented to the Board of Fisheries (BOF) at the Juneau meeting in 1997. Phil was the Chief Fisheries Scientist for the Alaska Department of Fish and Game and John was an Attorney with a PhD in fisheries science, and has served in State of Alaska positions in fisheries science, law and policy.

At that meeting the Board liked the concept we presented but when drafting the rules, we stopped them because the rules they were talking about were not sufficient to conduct a successful fishery. They tabled the rules to be taken up at the Sitka meeting the next month.

At the Sitka meeting we did not have a large presence because a lot of our proponents were fishing. The opponents were also given the month between meetings to organize and object to the proposal. In drafting the rules, the BOF made the pound size so restrictive that when Dan Coffey told me the ideas, I said to Dan that even I would not leave seining herring for pounding and I have all the equipment. Dan walked away miffed because the plan wasn't working and the proposal was voted down. Looking back, it was a mistake to not accept the plan because it could have been modified in later years and we would not be having to request a meeting with you.

We are concerned the overlapping area of GO1A and L21A was not implemented properly. You state, "A review of that record shows that the administrative area for Northern SOK fishery was specifically designed to provide managers with the flexibility to open subdistricts when and where the resource is healthy and surpluses exist." Yes, the design of the action was to allow the Northern SOK access to subdistricts, But the Subdistricts of 13-A and 13-B was already designated a Limited entry fishery GO1A on the Sitka herring stocks. This subdistricts 13-A and 13-B should have been withdrawn from the large area provided by CFEC. The CFEC should never have added more users to an already Limited Entry herring stock that was designated limited in 1977 and in 1992 had an optimum study. Eighteen years later the CFEC adds more users to the Sitka herring stock without any study or thought that creating more limited entry permits would put even greater pressure on the existing fishery management system.

You also say "That it was not fair to remove SOK permit holders from Sitka Sound when they had purchased permits in the fishery with the expectation of fishing in that area as permitted by ADFG managers". The idea that folks invested in Northern ROK permits for future access to Sitka surplus is



not believable. If that were truly the case there would've been Board proposals asking for access many cycles ago. The action by Seth Beausang, Assistant Attorney for the State of Alaska Department of Law (DOL), (Memorandum 2015 and Memorandum March 4, 2016) stating Northern pounders have access to Sitka stocks encouraged the thought, Northern pounders have access to Sitka stocks. This suggests CFEC did not act in the best manner when they failed to exclude the Sitka districts 13-A and 13-B from the L21A overlapped area when establishing L21A limited entry.

The Statewide Management for Pacific Herring information states; "Most herring fisheries in Alaska are regulated by management units or regulatory stocks (i.e., geographically distinct spawning aggregations defined by regulation). Those aggregations may occupy areas as small as several miles of beach or as large as all of Prince William Sound. Herring sac roe and spawn-on-kelp fisheries are always prosecuted on individual regulatory stocks."

The Alaska Board of Fisheries has asked the CFEC twice to separate the Sitka herring subdistricts from the large Northern pound area. The fact that the BOF made a second request to remove the subdistrict 13-A and 13-B from the overlapping L21A area should be more than sufficient to suggest to CFEC that the Board wants this action taken. You are not complying with that request because you say you have not received any new information that would compel you to have another hearing. We would like you to reconsider that position.

Best Regards
Darrell Kapp

cc: Ryan Kapp kappjr@comcast.net
Alan Otness adotness@gmail.com
Joe Lindholm redrivertfisheries@comcast.net
Charles Treinen cwtreinen@aol.com
Reed Morisky reed.morisky@alaska.gov>
John Barry pillarbay@gmail.com

Attachments (3)



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Commercial Fisheries Entry Commission

400 West 10th Street, Suite 100
Anchorage, Alaska 99501-5802
Phone: (907) 264-1601
Fax: (907) 264-6000

February 27, 2020
CERTIFIED RETURN RECEIPT
7018 3090 0001 1079 4280

Darrell Kapp
338 Bayside Rd.
Bellingham, WA 98225
Via Email: Kapp_D@msn.com

Dear Mr. Kapp:

The Commercial Fisheries Entry Commission (CFEC) received your February 10 and 26, 2020 requests to remove subdistricts 13-A and 13-B from the administrative area for the Northern Southeast Spawn on Kelp Pound Fishery (L21A).

CFEC has reviewed the request and appreciates your feedback and concerns. Nevertheless, at this time your request is denied for the reasons described in the attached correspondence, dated February 19, 2020.

By Direction of the

Commercial Fisheries Entry Commission

Fate Putman
Chair

Dale Kelley
Commissioner

Attachments (1)



THE STATE
of **ALASKA**
GOVERNOR MIRE DUNLEAVY

Commercial Fisheries Entry Commission

1000 North Steese Avenue
Sitka, Alaska 99781
Phone: 907-339-1234
Fax: 907-339-1235
Email: CFEC@ADFGLive.com

February 19, 2020

Darrell Kapp
338 Bayside Rd.
Bellingham, WA 98225
Via Email: Kapp_D@msn.com

Dear Mr. Kapp:

CFEC is in receipt of your February 10, 2020 letter expressing continued interest in utilizing open pounds as alternative gear for the Sitka sac roe seine fishery.

Attached you should find our most recent correspondence on this matter to the Board of Fisheries (BOF). As you are aware, your request ultimately involves more than a simple change of administrative area for the Northern Spawn on Kelp (Northern SOK) fleet. Additionally, it should be noted that the administrative area for the Northern SOK fishery was established after a comprehensive research and administrative process, including public comment. A review of that record shows that the administrative area for the Northern SOK fishery was specifically designed to provide ADFG managers with the flexibility to open subdistricts when and where the resource is healthy, and surpluses exist. Over the approximately 20 years since the boundaries of the Northern SOK fishery were drawn, new entrants have purchased permits with the knowledge that all Northern Southeast Inside districts fall within those administrative lines and could potentially be opened for harvest.

Nevertheless, in 2015, at the request of the BOF, CFEC proposed a regulation which would have redrawn the Northern SOK boundary and removed from those permit holders any future harvest opportunity in Sitka Sound. As part of that process, CFEC solicited comments and held a public hearing specific to the question of whether the administrative area should be modified.

Many permit holders made the time to travel to CFEC to comment in person or to comment by telephone; many written comments were also received. With the single exception of the principal proponent, Ryan Kapp, commenters were uniformly and steadfastly against the proposal.

Commenters made many arguments against the proposed area change, and most of them also chose to state during personal testimony their thoughts on the tabled BOF proposal that prompted BOF to request that CFEC modify the area. The hearing participants argued: 1) that it was not fair to remove SOK permit holders from Sitka Sound when they had purchased permits in the fishery with the expectation of fishing in that area as permitted by ADFG managers, 2) they argued that, if anything, the open pound concept is more compatible with fishing methods historically utilized in the SOK fishery than those historically used by sac roe seiners; 3) they argued that, removing one gear group from a potentially lucrative area for the benefit of another gear group would be



inconsistent with the principles of the Limited Entry Act and set bad precedent for any fisherman who has invested in a limited entry permit; 4) they argued that the ultimate end of the proposal, to introduce open pounds in Sitka Sound, could result in a glut in low grade product on the market which could be detrimental to pounders and sac roe fishermen alike; and, 5) they argued that the alleged market for the open pound product was unproven despite the fact that open pounding is not a new concept and is currently authorized in Alaska, Canada, and California.

We have attached the 2015 proposed regulations and there are links to the hearing record¹ below and in the documents mentioned above. After the hearing was conducted, CFEC decided not to modify the administrative areas², because there was very little public support to do so, and no new and approved management plan and rationale existed to help support the proposed change.

It should be noted that even if the BOF were to develop a management plan that allows pounds as alternative gear for herring seiners in Southeast, CFEC would have to determine whether such a proposal is consistent with the Limited Entry Act. Without adjudging the compelling comments made by fishermen at CFEC's 2015 public hearing, it stands to reason that the burden of persuasion with respect to this issue is very high.

Since there doesn't appear to be any new information, we do not believe that a meeting at this time would be fruitful. It might be best for you to work with the BOF and other interested parties to explore and develop a new concept prior to continuing the discussion.

Best regards,

Dale Kelley
Commissioner

Fate Putman
Chair

cc: Ryan Kapp <kappjr@comcast.net>
Alan Otness <adotness@gmail.com>
Joe Lindholm <redriverfisheries@comcast.net>

Attachments (3)

¹ CFEC Hearing Record, November 6, 2015.

² 20 AAC 05.230(a)(9)

A - Northern Southeast Area - Districts 9 - 16, as described in 5 AAC 33.200.

C - Southern Southeast Area - Districts 1 - 8 and Dixon Entrance District as described in 5 AAC 33.200.



February 10, 2020

Fate Putman, Chairman
Dale Kelley, Commissioner
Commercial Fisheries Entry Commission
8800 Glacier Highway, Suite 109
PO Box 110302
Juneau, Alaska 99811-0302

Dear Chairman Putman and Commissioner Kelley

We have been proposing using Open Pound Roe on Kelp as an alternative to sac roe seining in Sitka Sound since publishing "Open Platform Spawn on Kelp" by Philip Mundy PhD, John Gissberg PhD and Samuel Sharr BS. in Dec. 1996. We have met with the Alaska Board of Fisheries (BOF) through the years and had various setbacks during those years with trying to implement our proposal. We completed a trial project in 1998 and 1999, working with the Alaska Dept of Fisheries (ADFG), showing the validity of open pound spawn on kelp in the Sitka sac roe area. ADFG published a study showing ample kelp in Southeast Alaska available for the project.

Our latest setback is an opinion by Seth Beausang, Assistant Attorney for the State of Alaska Department of Law (DOL), (Memorandum March 4, 2016) which states "The board does not have authority to allow new entrants into the Northern Southeast herring pound limited entry fishery by allowing non-permit holders to use open pounds in the fishery" Because of this opinion the BOF cannot act on our proposal due to the Northern Pound administrative area overlapping the Sitka seine area.

The BOF requested the Commercial Fisheries Entry Commission (CFEC) to exclude the Sitka area from the Northern Pound area. CFEC had a hearing about the BOF request and the outcome was no action. We were told the hearing was supposed to be about the overlap rational, when the overlap occurred, etc. But the record shows the hearing was about the BOF proposal and the markets of our future production. We contend the BOF should have been the administrator of the proposal not the CFEC. The CFEC did not meet its obligation to set the fisheries areas as the BOF wants.

As time passed, we have had exchanges with the CFEC trying to overcome the DOL opinion which has left the BOF unable to consider our proposal. An e-mail exchange on Feb 28, 2017 to Seth Beausang from Bruce Twomley states that if the BOF were to again request the Sitka area excluded from the Northern Pound area the CFEC may take up the issue again. The BOF issued another request in a second letter to CFEC on March 16, 2018.

Our group has contacted the CFEC, asking when and where the new hearing would take place. We received replies that the hearing would not go forward. The reply to Ryan Kapp, February 1, 2019 from the CFEC shows they are not going to act on the BOF request. The CFEC reply also shows they are under the opinion that if the BOF were to allow GO1A permittees the alternative use of open pounds to harvest Sitka herring it would be adding more users to the limited entry Northern pound area. (DOL 3/4/16) The CFEC e-mail, Feb. 1, 2019 suggests if the BOF were to allow seiners to have an alternative harvest method of open pound they would be "additional users into this limited entry fishery" meaning CFEC may consider the Sitka area herring stocks are now the Northern Pounders stock due to the overlapping areas.



Did the overlap of the Northern Pound area with the Sitka seine area add to the potential of adding more users to the Sitka area herring stock? Indeed, DOL has stated the Northern Pound fishermen can propose to the BOF to allow them into the Sitka herring stock area because it is their area too. At the last BOF hearing cycle for Southeast Alaska finfish the proposal of allowing Northern Pounders into the Sitka overlap area was on the proposal list and, fortunately for Sitka permittees, was denied by the BOF.

The DOL opinion and the CFEC e-mail exchange, saying Northern Pound permittees have access to Sitka herring stocks, exemplifies the original administrative area of the Northern Pound permittees was too expansive. Never would the CFEC add more users into an already Limited Entry GO1A Sitka herring Stock. So, it must be as Bruce Twomley said in the hearing, "And so we had to acknowledge that our current definition of Northern spawn on kelp (area) may not have fully complied with our statute" He was speaking about the overlapping areas.

IF the CFEC fails to exclude Sitka from the Northern Pound area. The BOF, in the upcoming cycle, will likely be overrun with proposals because it's now assumed Northern Pounders have access to Sitka herring stocks. Herring stocks are regulated by spawning areas and Northern pound fisheries have never been on Sitka spawning stocks.

It concerns me the Board will not be able to deliberate our proposal in the 2021 cycle because of the overlapping administrative areas. The BOF has sent you a second letter requesting you to separate the areas but there has been no action put toward this request to date. April 10, 2020 is the deadline for submitting proposals to the BOF. Will the Board staff reject our proposal again because it cannot be acted on by the BOF according to DOL? This denial happened the last Board cycle and resulted in the second letter being sent to CFEC asking for the area overlap to be corrected so the BOF could hear, deliberate, and render decision on the proposal. If Sitka herring stocks are now considered to be Northern pound stocks then what happens to the Seine permit value if Northern pound permittees are allowed on Sitka Stocks? GO1A permits have typically been 10 times the value of Northern pound permits. Limited entry in Sitka happened first, Northern pound limited entry came years later. The overlap, unless corrected by CFEC, now suggests more users on the fully utilized Sitka stock.

CFEC should correct the definition of the Northern pound area into a "smaller administrative area" as Commissioner Carl Rosier suggested as a choice the CFEC could make when the area was adopted. We again request a meeting with CFEC Commissioners to discuss our concerns and plan a way forward. We suggest a meeting with CFEC at the soonest possible time so we may submit the proposal to the BOF prior to the deadline.

Best regards, Darrell Kapp

A handwritten signature in dark ink, appearing to read "Darrell Kapp", written in a cursive style.



Pacific Herring Information

- [Statewide Management](#)
- [History](#)
- [Species Information](#)
- [Herring Gear Types](#)

Statewide Management

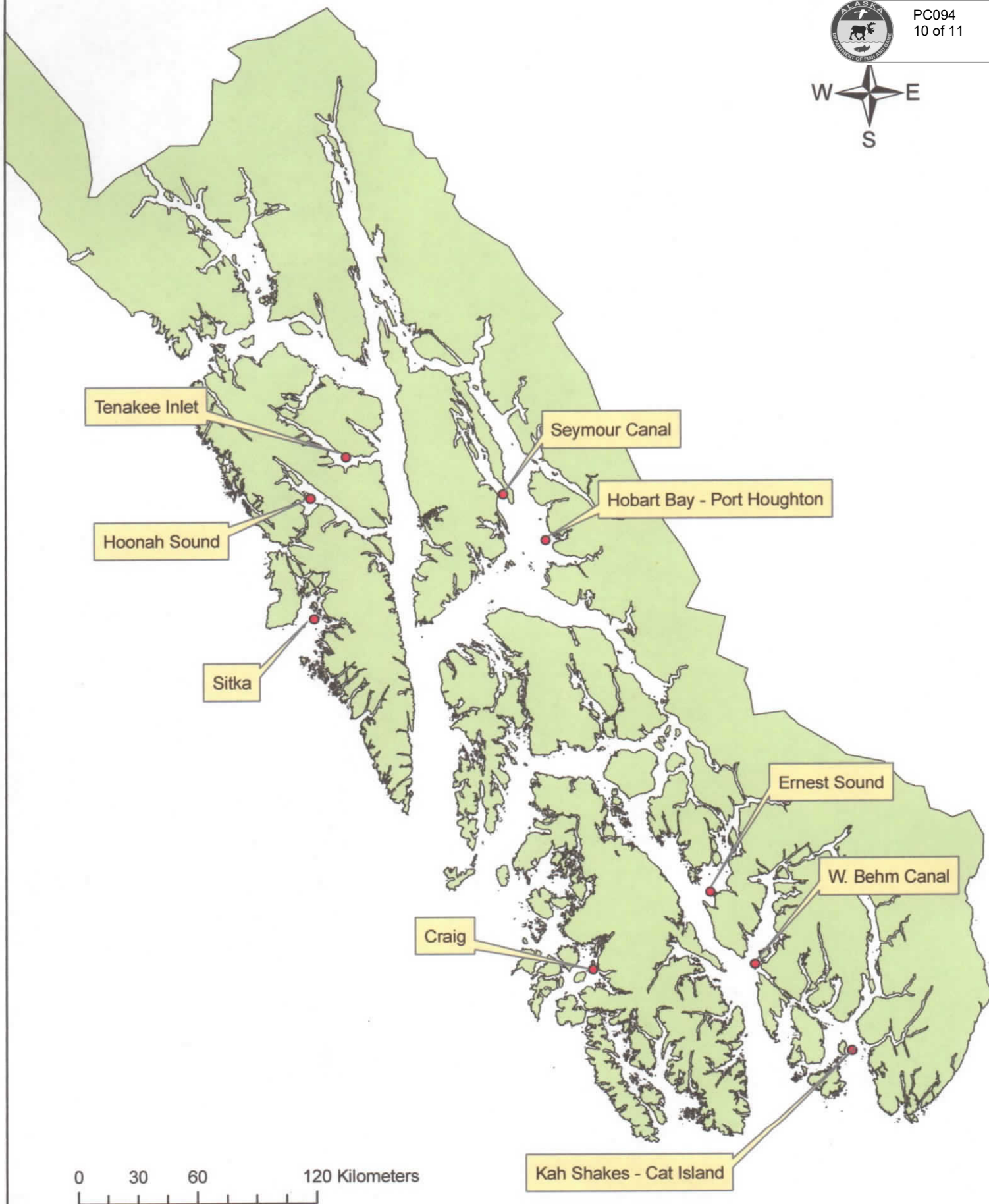
Harvest policies used for herring in Alaska set the maximum exploitation rate at 20% of the exploitable or mature biomass, consistent with other herring fisheries on the west coast of North America. The 20% exploitation rate is lower than commonly used biological reference points for species with similar life history characteristics (Funk 1991). In some areas, such as Southeast Alaska, a formal policy exists for reducing the exploitation rate as the biomass drops to low levels. In other areas, the exploitation rate is similarly reduced, without the formal policy. In addition to exploitation rate constraints, minimum threshold biomass levels are set for most Alaskan herring fisheries. If the spawning biomass is estimated to be below the threshold level, no commercial fishing is allowed. Threshold levels are generally set at 25% of the long-term average of unfished biomass (Funk and Rowell 1995).

Unlike most other Alaskan fisheries, fishery managers actively manage the sac roe fishery to obtain the highest-valued product possible. An intensive sampling program is used to monitor the condition of the ripening females, and fishery managers use this information to carefully time fishery openings down to days or even hours before the main spawning event.

Most herring fisheries in Alaska are regulated by management units or regulatory stocks (i.e., geographically distinct spawning aggregations defined by regulation). Those aggregations may occupy areas as small as several miles of beach or as large as all of Prince William Sound. Herring sac roe and spawn-on-kelp fisheries are always prosecuted on individual regulatory stocks. Management of food/bait herring fisheries can be more complicated because they are conducted in the late summer, fall, and winter when herring from several regulatory stocks may be mixed together on feeding grounds distant from the spawning areas. Where possible, the BOF avoids establishing bait fisheries that harvest herring from more than one spawning population. For historically-developed food/bait fisheries that harvest more than one regulatory stock, such as the Dutch Harbor or Kodiak fisheries, BOF regulations close the food/bait fishery if any of the component spawning populations are below threshold. Where there is more than one fishery on a spawning population, the BOF allocates specific percentages of the annual allowable harvest to each fishery.

For sac roe fisheries, openings are timed to occur when herring have produced the maximum amount of roe. The duration of openings is also set to achieve harvest quotas as closely as possible. Entry into most herring fisheries in Alaska has been limited under the authority of CFEC.

[Based on excerpts from the publication, Commercial Fisheries in Alaska, Woodby et al. Alaska Department of Fish and Game, Special Publication 05-09, June 2005 (PDF - 1,059K). Information or data on this web page may have been updated and may no longer match the original publication.]





MEMORANDUM

State of Alaska

Department of Law

TO: Glenn Haight
Executive Director
Alaska Board of Fisheries

FROM: Seth M. Beausang *SMB*
Assistant Attorney General

DATE: March 4, 2016

FILE NO.: JU2015200517

TEL. NO.: 269-5289

SUBJECT: Department of Law
comments on proposals
for the March 8-11, 2016
Statewide Finfish and
Supplemental Issues
meeting

The Department of Law has the following comments on the proposals to be considered by the Board of Fisheries at its March 8-11, 2016 Statewide Finfish and Supplemental Issues meeting:

Proposal 126: As we explained to the board last cycle, this proposal would allow Southeastern Alaska herring purse seine permit holders in Sitka to use open herring pounds in Sitka Sound in lieu of their seine gear. The Northern Southeast herring pound fishery is a limited entry fishery and includes Sitka Sound within the limited entry administrative area. In Southeastern Alaska, a "herring pound" can include an "open pound," which is defined in 5 AAC 27.130(e)(2). The board does not have authority to allow new entrants into the Northern Southeast herring pound limited entry fishery by allowing non-permit holders to use open pounds in the fishery. We understand from PC 16 that CFEC considered changing the administrative area of this limited entry fishery, in order to allow the board to act on this proposal, but that CFEC ultimately declined to change the administrative area. The board does not have the authority to adopt this proposal.

Proposal 194: Based on the statements in the proposal about the alleged impacts of trawl fishing on subsistence uses in this area, the board is encouraged to consider

Submitted By
Darren Patrick
Submitted On
12/20/2021 9:51:49 AM
Affiliation



PC095
1 of 1

Phone
9077386904
Email
gustavus65@gmail.com
Address
PO Box 226
Gustavus, Alaska 99826

I support both (p80)&(p83)&(p144). I have been fishing SEAK for 30 years and have seen many cuts to many fisheries. It has made it much more difficult to produce high quality fish and maintenance the vessel. The charter fleet does not help any fisheries financially period. They also do not follow the rules of the road on the ocean. They are always anchored on the drag in the middle of the troll fleet. They have access to the beach drags inside the 1 mile line where the heaviest concentration of fish are. What is good for the goose is good for gander. We all need to follow guildlines and contribute funds to help protect and conserve these fisheries for many generations. □□□

Submitted By
David Creighton
Submitted On
12/22/2021 10:09:28 AM
Affiliation



PC096
1 of 1

Phone
907-401-0686
Email
Davecreightonis@gmail.com
Address
Po Box 217
Criag, Alaska 99921

I am David Creighton. I am a born and raised Alaskan and currently reside year around in Craig. In these comments I represent myself and our family-owned business Shelter Cove Lodge in Craig, AK. Shelter Cove operates an 8-boat fleet in the city of Craig. On average we employ 5 people year around and 32 during our primary operating season of June through August. Many of our seasonal employees are college students returning home for summer to make the money needed to return to school the following year.

Our business brings between 500 and 600 people into Craig each summer. They purchase round trip tickets on our local air carrier, gifts, alcohol, they pay a 5% sales tax on their trip and purchases as well as a local bed tax. Our business distributes money throughout the year to Craig's local stores for tackle, fuel, equipment, services, and supplies. Our local boat shop owner expressed to me today that the charter industry accounts for close to 50% of his gross annual revenue and without the charter fleet, it would no longer pencil out for him to operate in Craig.

I believe many Alaskans are keenly aware that depending on resource-based economics through mass extraction has proven to be a dying approach. It is successful in the short term but eventually the resource will be depleted. With this thought in mind, I urge you to consider the economic benefit per pound of resource extracted when you compare the tourist-based charter fishing industry to other resource consumers/harvesters.

Proposition 82

I am strongly opposed to Proposition 82 as written. With a regulation set that allows for a 1 daily/ 1 annual fish for a non-resident after June 15, our clients will not be willing to pay for a fishing trip. A 1 or 2 king annual limit is not sufficient to sustain a lodge business that operates a 3-day package and people will not spend the travel dollars to fish for 1 or 2 days. We will be forced to reduce our season to a start date of approximately July 15th when the silvers traditionally arrive in catchable/marketable numbers. Our lodge cannot survive off of a six-week season.

The charter fleet has been continually hit with retention reductions to allowable catch for the last 15 years. We are now rapidly approaching the breaking point and the destruction of one of our small communities' last remaining economic sustaining industries. Please comprehend that a person visiting Alaska to fish after June 15th for 3 days will only be able to retain a total of 5 primary game fish. Don't forget that 4 of those 5 fish are regulated so they can only retain small ones. Would you spend more than \$5000/person total including travel to accomplish this?

Proposition 83

I am in support of Proposition 83. I feel whole heartedly SEAGO has drafted a well-researched proposal sufficient to request this equitable solution for both gear groups. SEAGO has examined and demonstrated via historical data and supporting numbers derived with ADF&G assistance that prove Prop. 83 will pencil out. 83 will sustain the charter industry, impart very little impact on the troll fleet all while still accomplishing the necessary management of the species and compliance with the treaty.

Proposals 84,85, and 86

When it comes to king salmon, a resident priority seems unnecessary. So far in history, I can only recall kings being shut down to residents late in the season. By this time, residents have had ample opportunity to catch their kings. By the time the closures occur, most have moved on to collecting silvers and bottom fish. One of the distinct advantages of being a resident is you get to target each species when the opportunity is best. You fish with the fishing is good! King salmon fishing is not typically considered to be at its peak in August.

Submitted By
David Egan
Submitted On
12/3/2021 7:47:09 PM
Affiliation



PC097
1 of 1

I support proposals 156, 157, 158 and oppose proposals 159, 160, 161, 163, 164, and 165. Subsistence fisheries have sustained Alaskans for thousands of years longer than the commercial fisheries and now they're under threat. We owe Alaska's natural abundance to the stewardship of Alaska Native people and it's important to give their voices priority in matters concerning the management of natural resources. The herring stock is endangered and needs to be restored to greater abundance before we risk diminishing it further.

Submitted By
David Ellsworth Johnson
Submitted On
12/22/2021 9:56:55 PM
Affiliation



PC098
1 of 1

Phone
9076176644
Email
dejohnsonak@yahoo.com
Address
137 Shelikof Way
Sitka, Alaska 99835

As a long-time Alaskan resident and sport fisherman with a daughter who is a commercial troller I am concerned that the charter sport fishing fleet continues to grow in volume and catch. The commercial trollers financially support hatcheries; the charter fleet does not.

I support efforts to safeguard the commercial troller's allocation of king salmon, particularly in years of lower abundance. Rather than resort to in-season changes on sport fishing bag limits I support careful and conservative bag limits that safeguard resident angler's opportunities to take and keep king salmon. I support aggressive study and data gathering to document charter fisherman impact on threatened fish stocks transiting Icy Straits and Sumner Strait.

Overall I am very proud of the outstanding job of managing our treasured fisheries that the department and the advisory committees have worked together over the years, and I commend you all for your hard work.



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 Clam Gulch / Ninilchik, Alaska. A strong sustainable hatchery fishery in Southeast and statewide benefits all users by supplementing salmon for commercial, sport, subsistence, jobs, commerce and processor opportunities.

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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



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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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

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

Sincerely,

David Martin
dmartin4091@gmail.com
(907) 252-2752

Submitted By
David Barnaby O'Rorke
Submitted On
12/22/2021 1:49:03 PM
Affiliation



PC100
1 of 1

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

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

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



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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



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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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

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

Sincerely,

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



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

Re: King Salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

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

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

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

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

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

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

Sincerely,

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

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



PC103
1 of 2

2022 Board of Fisheries testimony.

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

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

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

Proposal 83: oppose.

Proposal 84: No comment.

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

Proposal 86: No comment.

Proposal 87: No comment.

Proposal 88: No comment.

Proposal 89: No comment.

Proposal 90: No comment.

Proposal 91: No comment.

Proposal 92: Support.

Proposal 93: No comment.

Proposal 94: No comment.



Enhancement and special harvests areas:

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

Proposal 106: oppose.

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



PC104
1 of 1

Phone
907 518 0877
Email
fvdenaemarie@live.com
Address
Box 1624
Petersburg Ak, Alaska 99833

Opposed to proposal 208

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

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

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

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

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



PC105
1 of 2

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

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

Thank you, Devon Calvin

F/V I Gotta

F/V Morning Mist

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



PC105
2 of 2

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

Dear members of the Board of Fish,

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

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

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

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

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

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



PC106
1 of 1

Hello,

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

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

Diana Brooks



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

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

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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

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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is



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

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

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

Sincerely,

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

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



PC108
1 of 1

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

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



PC109
1 of 4

Phone
9079651780
Email
nakwasina@gmail.com
Address
PO BOX 180444
Coffman Cove, Alaska 99918

Proposal 121-

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

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

Thank You

Doug Rhodes

Box 18044

Coffman Cove, Alaska 99918

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



PC109
2 of 4

Phone
9079651780
Email
nakwasina@gmail.com
Address
PO BOX 18044
Coffman Cove, Alaska 99918

Board of Fisheries Members:

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

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

Again, I am opposed to proposal 113.

Doug Rhodes

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



PC109
3 of 4

Phone
907 965 1780
Email
nakwasina@gmail.com
Address
Box 18044
Coffman Cove, Alaska 99921

Proposal 277

Dear Board of Fish Members-

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

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

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



PC109
4 of 4

Phone
907 965 1780
Email
nakwasina@gmail.com
Address
Box 18044
Coffman Cove, Alaska 99921

Support proposal 277

Dear Board of Fish Members-

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

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

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

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



Douglas Island Pink and Chum, Inc.

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

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

December 14, 2021

Members of the Alaska Board of Fisheries,

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

DIPAC opposes proposals 101 & 103.

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

Respectfully,

Katie Harms
Executive Director - DIPAC

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



PC111
1 of 1

Phone
2182806637
Email
Delarson17@gmail.com
Address
307 Lake St.
Sitka , Alaska 99835

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

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



PC112
1 of 1

Phone
3015180097
Email
Ellielore@gmail.com
Address
700 Etolin St
Sitka , Alaska 99835

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

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

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

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

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



PC113
1 of 1

Hello,

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

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

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

Thank you for the opportunity to make my voice heard.

Respectfully,

Eleyna Rosenthal

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



PC114
1 of 1

Phone
9713372656
Email
elizabeth.q.evans@gmail.com
Address
66665 Fry Court
Homer, Alaska 99603

Hello,

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

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

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

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

Gunalcheesh

Eli Evans

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



PC115
1 of 1

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

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



PC116
1 of 1

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

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

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

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



PC117
1 of 1

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

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

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

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

Thanks for your time and decision-making,

Elsa Sebastian

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



PC118
1 of 1

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

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

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



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

Phone
9077476743
Email
chumtroller@gmail.com

Address
103 Gibson Place
Sitka, Alaska 99835

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

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

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

Proposal 82

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

Proposal 83

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

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

Proposal 85

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

Proposal 89

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



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

Proposal 90

SUPPORT I agree with the proposer. Good idea!

Proposal 91

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

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

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

Proposal 92

SUPPORT AS AMENDED BY TAD FUJIOKA AND THE SITKA AC.

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

Proposal 101

OPPOSE.

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

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

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

Proposal 114

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



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

Proposal 115

SUPPORT AS AMENDED BY THE SITKA AC

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

116

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

117

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

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

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

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

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

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

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

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

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

Proposal 144

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

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

Proposal 2001

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

*On the Northern SEAK King Salmon Stock Status & Action Plan, 2021 (RC6)
I strongly recommend the Dept. rewrite this plan along the lines of comments*

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

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

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

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

Thank you for reading my comments.

Eric Jordan
F/V I Gotta (907) 738-chum



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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

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



SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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

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

Sincerely,

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

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



PC121
1 of 1

Phone
9077232057
Email
kunesh@alaska.net
Address
273 south legacy loop
soldotna, Alaska 99669

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

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

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

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

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

Thank you for your kind consideration.

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



PC122
1 of 1

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

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

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

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

Thank you for your time,

Ernest Manewal

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



PC123
1 of 1

Dear Alaska Board of Fisheries:

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

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

Thank you very much for your time.

Submitted By
Evan p Norbistrath
Submitted On
12/19/2021 8:48:58 AM

Affiliation
s.p.c member alaska trollers association member

Phone
3604605736

Email
fvswan@yahoo.com

Address
3725 south airport road
port angeles, Washington 98363



PC124
1 of 1

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

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



PC125
1 of 1

Phone
9077380273
Email
rip_curl_29350@hotmail.com
Address
101 Peace Lane
Sitka, Alaska 99835

To State Board of Fish and Game

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

Therefore, I ask you do not support Proposal 201.

Sincerely, Evans Sparks - F/V Sentry



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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

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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is



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

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

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

Sincerely,

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

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



PC127
1 of 1

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

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



PC128
1 of 1

Hello Board Of Fish Members,

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

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

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

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

Regards,

Frank W. Warfel

Permit Owner G01A644760

F/V Pacific Sea

Wrangell, Alaska

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



PC129
1 of 1

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

To whom it may concern,

I am writing in regards to Proposal 121

5AAC 33.350. Closed waters around Coffman Cove.

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

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

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

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

Best Regards,

Gabe Winter

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



PC130
1 of 1

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

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

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

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

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

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



PC131
1 of 1

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

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

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

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

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

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

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

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

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

thank you for this opportunity to comment on the proposals.



Public Comment on PROPOSAL 208

PROPOSAL 208

5 AAC 32.150. Closed waters in Registration Area A.

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

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

I am opposed to proposal 208!!!!

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

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

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

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

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



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

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

Thank you for taking the time to consider my thoughts

Gary Adkison

F/V Kala Kai

Hollis AK

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



PC133
1 of 1

Email

Vivilapidus@gmail.com

Address

3838 48th Ave
Seattle, Washington 98105

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

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

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

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

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



PC134
1 of 1

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

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

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

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

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



PC135
1 of 1

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

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

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

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

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

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

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



PC136
1 of 1

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

Hello,

I strongly support Proposals 156,157, & 158.

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

Thank you,

Grant EchoHawk



Greater Juneau Chamber of Commerce

9301 Glacier Hwy, Suite 110 • Juneau AK 99801 • (907)463-3488

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Benjamin Brown
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Eric Forst
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Bruce Denton
Secretary
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Max Mertz
Treasurer
Mertz CPA & Advisor

Mike Satre
Hecla Greens Creek Mine

McHugh Pierre
Goldbelt Inc.

Jodi Garza
Alaska Seaplanes

John Blasco
Alaskan Brewing Co.

Laura Martinson
Caribou Crossings

Connie Hulbert
AEL&P

Scott Bergmann
The Alaskan Fudge Co.

Ray Thibodeau
Alaska Marine Lines

Richard Burns
Juneau Radio Center

December 22, 2021

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

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

Subject: Opposition to proposals 101 & 103

Members of the Alaska Board of Fisheries,

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

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

Juneau Chamber opposes proposals 101 & 103.

Respectfully,

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

907-463-3844
cdahl@juneauchamber.com



December 21, 2021

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Edward Jones

Mary Wanzer

First Vice President
Coastal Real Estate Group

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KPU Telecommunications

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Treasurer
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Foraged N Found

2021 Directors

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Ward Cove Group

Bergen Wieler

Vigor Alaska

Christy Willis

AFLAC

Carolyn Henry

PeaceHealth Ketchikan Medical
Center

Jeremy Yoder

Alaska Crepe Co

Abby Bradberry

Island to Island Veterinary Clinic

Jai Mahtani

Gold Rush Jewelry

Jacquie Meck

The Local Paper

Katherine Tatsuda

Tongass Federal Credit Union

Chamber Staff

Michelle O'Brien

Executive Director

To the Members of the Board of Fisheries:

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal



communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Southeast harvests of hatchery salmon generate approximately \$237 million in total output. Additionally, Southeast hatcheries support 2,000 jobs and provide \$90 million in labor income. SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in opportunity would impact the stakeholders, communities, and user groups significantly, but would be especially hard-hitting during years of low returns.

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

Thank you for your serious consideration of this important matter.

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

We look forward to your decision supporting our vital industry,

On behalf of the Board of Directors:

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

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

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



PC139
1 of 1

Hello Board Members,

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

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

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

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



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

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

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

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



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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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

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

Sincerely,

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

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



PC141
1 of 1

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

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



PC142
1 of 1

To the Board of Fish,

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

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

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

Sincerely,

Hannah Wilson



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

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

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



PC144
1 of 1

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

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

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

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

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

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

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

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

Thank you.
Sincerely yours.

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



PC145
1 of 1

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

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



PC146
1 of 1

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

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

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

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

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



PC147
1 of 1

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

Thank you for taking the time to read my comments.

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



PC148
1 of 1

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

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



PC149
1 of 1

Phone
9077389950
Email
jacob.friske@mehs.us
Address
420 Kramer Ave #A
Sitka, Alaska 99835

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

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

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

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

Thank you for your time.

Jacob Friske

Rylan Armstrong

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



PC150
1 of 1

Phone
907-957-6245
Email
Jake_miller40@hotmail.com
Address
2520 sunset drive #20
Juneau , Alaska 99801

Hello-

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

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

Thank you for your time!

Submitted By
Jacyn Schmidt
Submitted On
12/22/2021 2:58:22 PM
Affiliation



PC151
1 of 1

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

I'd like to include an excerpt from Thomas Thornton's Herring and People of North Pacific:

"Marine biologists argue that herring and other forage fish are too important for their 'ecosystem service' values to be 'maximized' for extraction by a small group of fishers and exported to foreign markets. The stakes are high and the potential for collapse is real under current Maximum Sustainable Yield policy. Even if the fishery avoids collapse, the undue pressure of commercial maximization has meant that subsistence users are not getting enough eggs to satisfy their needs, especially in their customary and traditional use areas. (page 5, introduction)"

Regarding proposal 159: There are NOT already ample provisions protecting subsistence resources - according to the Sitka Tribe of Alaska, subsistence harvest needs have not been met in 8 out of the last ten years. Subsistence needs must take precedence over commercial fishing because they are essential to the physical, economic, traditional and cultural wellbeing of Native people.

I am deeply concerned about the wellbeing and long-term health of herring in the Sitka Sound. I agree that using modeling, measurements, and tested methods will lead to the best assessment of the situation and ensure the long-term health of the herring fishery. I urge you to consider Tlingit science, alongside Western science in how you advise these management decisions. Tlingit science is rigorous and has been practiced for several thousands of years, is based on observations and understandings of the world, and has proven management success - which is not true for Fish and Game managed herring fisheries historically across Southeast. Management decisions are stronger if and when they consider BOTH Western and Tlingit sciences. We should be so /lucky/ to hear from Indigenous experts who know the subsistence needs and status of sacred herring better than anyone else. And... as many people in Sitka can attest - herring are too valuable and precious to take any risk on - I ask that you listen to subsistence experts and use Tlingit science in your decision making.

Proposals 159, 160, 161, 163, 164, 165, and 166 lack good scientific justification, disrespect subsistence users and modern traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. None of the proposals go far enough to advance respectful stewardship and protect the herring for generations to come, but proposals 156, 157, and 158 get us closer to that goal.



December 20, 2021

Alaska Board of Fish
RE: Support for Proposal 83

Dear Board of Fish members,

My name is James Daniels. I am the owner of Highliner Lodge & Charters Inc, and president of the Pelican Charter Fishing Association. I am writing on behalf of both entities today to support the adoption of Proposal 83. Although there are six other charter fishing businesses operating in, or out of, Pelican, I will detail only the economic contribution of the Highliner Lodge.

Highliner Lodge & Charters Inc. employed 19 individuals this past summer, 4 of which are employed year round. This does not include my wife and I, who are also employed year around by the Highliner Lodge. We employ more people than any other entity in Pelican. (Pelican's population is about 45). Not including my wife and I, the payroll (plus tips that our crew received) was over \$920,000 this year.

Highliner Lodge & Charters Inc. alone pays one third of all property taxes collected by the City of Pelican. We are the single largest consumer of all city services at the Pelican Small Boat Harbor, Pelican Fuel Dock, Pelican Utility, etc. We pay moorage and support services for 13 vessels and our average purchases from the City of Pelican over the last three years was about \$200,000. We utilize Alaska Seaplanes exclusively to transport or crew and guests in and out of Pelican; that expense was well over \$250,000 in 2021. Our total tax paid to the city was \$61,000. The City of Pelican has raised a new sales tax that will tax 2% of our gross income, so we will be paying an additional \$70,000 in 2022. In 2023 our city sales tax doubles to 4%, that will add another \$70,000 to the city coffer. That is a total of \$201,000 in taxes to the City of Pelican if our business level remains the same.

Although we are the largest charter fishing company in the Pelican area, if you added the half dozen other businesses to this tally, these numbers would increase by about 50%.

Clearly, our economic impact on Pelican, a city of 45 individuals, is enormous.

We buy all of our supplies out of Juneau. (\$539,000 in 2021)

King salmon is an essential part of our business, particularly in May & June. Without king salmon, we would have a very difficult time attracting business. We support proposal 83, because it would allow the charter fleet in SE Alaska a more steady, reliable catch of king salmon from year to year. We would gladly forgo our customers being able to keep 2 kings per day, and/or a relatively high 4-6 kings per season in



years of high abundance; so that our customers could count on keeping 1 king per day and a lower annual limit per season per customer in *all* years.

It is very difficult to market a charter fishing trip to Alaska when our prospective customers can't know in advance that they will be able to keep a king salmon. What is possibly worse for our business is trying to explain why, after they have purchased a king salmon stamp, they are not allowed to keep *any* king salmon.

I am an Alaska resident, and I have commercially trolled for salmon and long-lined for halibut and sablefish for over 40 years in Alaska, and I still participate in those fisheries. I understand the need for conservation. I believe that the commercial fleet should not lose harvest opportunities because of a growing charter fishing fleet. I have previously testified to the Board of Fish that my charter fishing business could get by on *only* one halibut per day and slot limits reducing the size of that halibut, because I do NOT support taking fishing opportunities from the long established commercial fishing fleet to give to the newer growing charter fishing fleet.

It is my understanding that Proposal 83 does not reduce the commercial king salmon catch overall, they can mop fish up in an August king salmon opening if they haven't caught their own quota earlier in the season. Our guests have no opportunity to claim their "lost" king salmon. We are marketing a *chance* to catch a king salmon, we don't need to catch a lot of king salmon.

Please consider this argument for supporting proposal 83.

James & Jill Daniels
Owners
Highliner Lodge & Charters Inc.
steve@highlinerlodge.com
907 738 1606

James Daniels
President
Pelican Charter Fishing Association

Submitted By
James Erickson
Submitted On
12/21/2021 7:54:04 PM
Affiliation
Subsistence user



PC153
1 of 1

First, I am a subsistence user. 2nd, I believe herring are a Big part of a important marine food chain. The commercial herring fishing frenzy is in a word wrong not to forget crazy unsafe. I support: 156,157,158. I oppose 159, 160,161, 163, 164, 165.

Submitted By
James Carter Hughes
Submitted On
12/20/2021 2:25:38 PM
Affiliation
self

Comments by James C Hughes, representing myself on Proposals:

80 through 92, 95,96, 101,103, 144, 225

Madam Chair Marit Carlson-Van Dort and members of the Alaska State Board of Fisheries (BOF):

Thank you for the opportunity to comment. My name is Carter Hughes and I am a Sitka based troller. I also crew on a longline vessel when catching my halibut and sablefish IFQ. I have been in the Alaska Commercial fishing industry since 1984 and have owned and operated my own vessel since 1993. I have spent most of my adult life fishing in Alaska and for over 30 years I have been involved in fisheries issues. I sat on the Alaska Trollers Association (ATA) Board from 1995 to 2011. I have been on the Seafood Producers Cooperative (SPC) Board since 2014. Most of my comments will be directed towards proposals that directly or indirectly impact the salmon troll fishery. In particular, I will be commenting primarily proposals that will cause a large change in the Southeast Alaska King Salmon Management Program (KSMP).

Before I start my comments on the proposals that impact the SEAK KSMP, I want to bring some things to the attention of the BOF. The Pacific Salmon Treaty (PST) was established in 1985. Since 1998, the PST has been renegotiated every 10 years. During that 3.5 decade span, Alaska has taken cuts at every cycle of negotiation. The Northern Panel, the team of stake holders that represent the various user groups in Alaska, provides for two seats for all industry groups, including the tourist driven recreational sector. During the lead up to the 2018 agreement, a particularly tough round of negotiations, all user groups were aware of the potential restrictions that could occur. The restrictions were harsher than expected, however the Northern Panel members were part of that negotiation. Part of the latest PST agreement is that Alaska CAN NOT go over it's PST king quota for any reason. If Alaska does go over its quota, there are harsh penalties and the fish MUST be paid back the following year. There is also an upper bound on the highest tier of abundance levels that restricts Alaska from harvesting as many kings as it could at former very high levels. Given that the latest PST requires Alaska as a user group to stay with in its quota bounds and pay back any overage the following year, regardless of abundance levels or trends, and that those terms were signed and approved by all the members of the Northern Panel along with the Commissioners, there is no reason to provide for an individual user group's overage without a rigorous and immediate payback method. This is especially true of the groups that make money off of harvesting king salmon, whether they be "commercial" fisherman or businesses that derive their income by providing for nonresident harvest of king salmon. As for the resident angler, they have been at a stable level of harvest for most of the time that the PST has been in place. The troll fleet and the net groups have had limited entry since prior to the establishment of the PST and thus they are stable by the fact they can't grow in size as a fleet. This is not true of the guided and unguided nonresident harvest group. They are not a stable user group and their growth is their own issue to deal with inside the boundaries of their allocation.

There is another issue that the BOF should consider. There are currently 7 Chinook Stocks of Concern (CSOC) listed in SEAK. Most of the CSOC were initially designated in 2018 at the request of ADFG, at the January, 2018 BOF meeting in Sitka. All user groups have taken cuts to preserve the CSOC. These cuts have involved time and area closures in known migration corridors that the CSOC transit on the way to their spawning rivers. The troll fleet in particular has lost the last 6 weeks of the winter king fishery, which typically is the most productive weeks of the fishery and also the time with the highest amount of AK produced hatchery kings present in the winter harvest mix.

An important component of producing hatchery fish at the regional hatchery programs, is the 3% enhancement tax that is assessed to all the commercial gear groups based on the landed value of their salmon at the dock when they sell. The troll fleet has lost much of its harvest access to AK hatchery produced kings with time and area closures during the months of May and June as well. These openers were in areas that were designed to increase AK hatchery king harvest and constrain Treaty fish harvest. The openers initially were established in the 1980s to allow for some troll fishing opportunity in the Spring to mitigate cuts taken at the PST. Many of these openers and the areas were designed by cooperation with the Regional hatchery associations (NSRAA and SSRAA), ADFG and troll fleet input. Unfortunately some of these areas were in corridors that were prone to CSOC migration at the times of the openers. Some of these corridors are still open to heavy harvest effort from the recreational fleets that fish out of the lodges, both guided and unguided. This is especially true of the Cross Sound, Lisianski Inlet area. Troll hatchery openers were closed there to prevent the interception of CSOC and now the harvest effort has been replaced by the lodges in the area, that are not monitored or sampled. The guides submit logbooks, which is helpful, but the bare boat lodge boats do not. And because the kings landed at the remote lodges aren't sampled, the recreational impact on the CSOC in these areas is unknown.

Finally, the BOF should be aware that the State of Alaska and the National Marine Fisheries Service are currently the defendants in a lawsuit being heard in the Federal District Court of Washington State. ATA is also a party to this suite. The suite alleges that the harvest of



king salmon in SEAK is contributing to the decline in the Southern Resident Killer Whale (SRKW) population. The primary stocks of Chinook that the SRKW feed on are Puget Sound Chinook runs and do not migrate to the far north in significant numbers. There is years of evidence from fisheries data collected, especially from the troll fleet, to support this. However, despite NMFS explaining this fact to the Court, the Court has chosen to disregard the information. Currently, the Court is still undecided on how to address the situation. That said, it is entirely possible there could be substantially larger cuts in king salmon harvest dictated to Alaska by the Court. All user groups must be prepared to harvest less king salmon. Now is not a good time to be making major changes to the SEAK KSMP or to set a precedent of one user group being allowed to exceed its limits without consequence.

Now I will address specific proposals.

Proposal 80: I support the idea of Proposal 80 submitted by ADFG with the caveat that I want individual groups within King Salmon Management Plan harvest regime to be accountable for their own overage.

Proposal 81: I support this proposal but would like to note that there is already a similar mop up regulation in effect. Also, given the growth in the guided and unguided recreational harvest by nonresidents, this situation is not likely to occur very often in the future unless something catastrophic occurs to the national economy or another pandemic or this pandemic flares up as happened in 2020. The most likely scenario, given that there is no limited entry scenario for the guided sport fleet or limit on the number of bareboat charter lodges or the vessels they may own, is that there will be little need for the application of this regulation. Still it is a tool that ADFG can use to closely manage the total harvest of Chinook if necessary.

Proposal 82: I support the ADFG proposal 82 with the modifications suggested by the Sitka Advisory Committee that are intended to protect access for resident anglers. I would also like to note that the Dept is asking for guidance on how to apply in season management to the recreational fishery and whether it should be managing to the 20% on a yearly bases or on an averaging of years. I support the use of in season management as a necessary tool for managing the recreational fishery given the current growth trend in lodges and their fleets. I support using in season management to meet the 20% harvest level for each individual year as there is no explicit payback method currently in regulation for a user group that goes over its allocation boundary. It would be inconsistent with the PST to not manage to the individual year. ADFG must manage to the individual year with respect to the total Treaty harvest of Chinook.

Proposal 83: I strongly oppose this proposal. The mechanics of this proposal are flawed. Without limited entry for the guided sport sector and nonguided sport sector (a limit on lodge ownership of vessels for clients or something similar), the 80/20 average will never be achieved in the long run. The number of vessels and lodges that are harvesting Chinook, and other fish species for nonresident (tourists) is increasing. The king salmon quotas that will be available are significantly lower than they were in the 1990s, when the referenced previous method of management in this proposal was in place. The tourist based recreational harvest season is about 2 months longer than it was in the 1990s. At the time of the former management regime, most of the guides and lodges were booking clients primarily from Memorial Day to Labor Day. Now the majority of the fleet is active from early May to mid-September. Also, there were very few unguided (bare boat charter) lodge operations in the 1990s. Now there are many, and the number is growing. The idea that an 80/20 allocation average can be achieved under this suggested regime is not realistic. The authors of this proposal had members of their organization sitting on the Northern Panel as a stake holder representative for the recreational sector. They are well aware that the latest PST agreement requires that all groups make due with less king salmon. This proposal would need an a payback component that paid the fish back the following year to work.

Proposal 84: I support this proposal. It is designed to protect the resident angler and one of its suggestions is daily electronic catch reporting from lodges and guides (guides already keep log books). Electronic reporting by lodges, especially those that offer "unguided" bare boat charters, is essential for accurate monitoring of the nonresident, recreational side of the industry. I would like to note that individual guides are already keeping and submitting logbooks I would like to see lodges do the same. I see lodges as small processors. It would be more streamlined if a lodge reported daily or weekly for its fleet. So the lodges are monitored for catch. In order to rebuild the CSOC, there will need to be sampling at lodges so that tags and genetic samples can be collected to truly understand the composition of the catch as is done in the troll fishery.

Proposal 85 and 86: I support these two very similar proposals as they protect the resident angler and speak to the growth in the guided recreational sector.

Proposal. 87: I support the concept of electronic reporting for the component of the recreational non resident and tourist based industry,



in particular lodges, especially those with bare boat charters. The guides are already submitting log books.

Proposal 88: I oppose this proposal for similar reasons to Proposal 83.

Proposal 89: I oppose proposal 89. The proposal provides for trollers that have two power troll permits on board a vessel to be able to fish 6 lines (2 additional) during times when kings may not be retained. This proposal will cause problems with the PST in areas where Canadian bound coho are likely to be in high abundance (Dixon Entrance). The use of additional lines will increase the non-retention encounter rates with king salmon and with that there will be some increased king salmon mortality. This will also cause PST problems. There is a coho sharing plan with the net fisheries in SEAK and the troll fleet is currently catching its allocation and sometimes it is above it's allocation. If Proposal 89 is passed, there could be concern from the net fisheries and a push to have a longer August closure for the troll fishery. Increasing troll efficiency will most likely cause conflicts with other gear groups. Also, this proposal is likely to activate currently dormant permits. ADFG opposes this proposal in their comments. The ADFG comments also provide a table with harvest percentages that display the net groups and troll harvest percentage of coho over the past 30 years. Recently, coho runs have been average or below. There is no reason to increase troll efficiency on coho harvest at the current time. I could see this proposal being passed if the use of 6 lines was limited to designated hatchery Terminal Harvest Areas (THA) or Special Harvest Areas (SHA) for harvesting chum salmon only. These areas tend to be small and congested however. I am not sure how effective that would be. Using 6 lines on the open ocean to harvest cohos will cause many problems and should not be expanded beyond it's current limit.

Proposal 90: I support proposal 90 as it aligns the opening day of the winter troll fishery with the letter of the regulations in the PST. The October 11 opening date does not always include all of statistical week 41. There is a potential here for all user groups to benefit if the CPUE is greater since the Abundance Index that determines the quota is driven by the CPUE in District 13 for Stat weeks 41-48.

Proposal 91: I oppose proposal 91. Changing the percentage of king harvest between the July and August openers is highly allocative within the troll fleet. There really hasn't been a problem with the troll fleet catching the fish in the second opener in recent years. The longer openers generally provide more opportunity for a larger amount of participants. The slower fishing typically leads to a higher quality product. A shorter 2nd opener does not create a problem for me as I can always turn around at a packer and be back out fishing the next day.

Proposal 92: There is already a provision for the retention of 26" kings in hatchery THAs. Am I missing something here. This Proposal won't change anything as far as I can tell.

Proposal 95: I support this Proposal as it effectively advocates for in season management of the recreational fishery.

Proposal 144: I support Proposal 144. This proposal if passed will provide for a timely and more complete set of data to cover the rapidly increasing use of rental boats for nonguided, nonresident anglers that are visiting lodges that don't provide guides on the boats they rent. This is particularly true of lodges that provide bareboat rentals in remote areas like Pelican, Excursion Inlet and Elfin Cove which are highly productive and growing in size but not significantly monitored. The creel sensuous is not very effective in the remote areas and those lodges are growing and so is their harvest. I would like to note that a more efficient way to collect data from lodges, especially in remote locations, and regardless of whether they use guides or bare boat charters, is to have the lodges submit regular production reports like processors. Effectively, they are processors and should be monitored accordingly. This could be achieved with electronic reporting. I support the electronic reporting. I would also like to note that the ADFG comments claim there is no conservation issue, but the fact is ADFG does not know because they do not monitor the activity in of the remote bareboat lodges and they do not take tag or genetic samples from these lodges. I noted this earlier in my preamble when discussing the increased harvest effort in the Cross Sound and Lisianski Inlet areas where trollers have had their hatchery access openers closed to protect CSOC only to have those same areas repopulated by the guided and unguided fishing lodge fleets. Throughout the ADFG comments on modifications to nonresident harvest, there is a lack of acknowledgement of the fact that the bare boat lodges and their fleets are growing.

I will now address some proposals that speak to the management of hatcheries.



Proposal 101 and 103: Proposals 101 and 103: I oppose these two proposals that request an extra management layer be added to the production of hatchery fish. Proposal 101 speaks specifically to the Northern Southeast Aquaculture Association (NSRAA) Crawfish Inlet fisheries. Both proposals ignore the current involvement ADFG has in the permitting, location and management of the hatchery access fisheries in the Terminal and Special Harvest areas through the Regional Planning Team (RPT). ADFG, along with hatchery management and stakeholders are all represented at these meetings. No evidence is presented of the straying issue that is mentioned. I fully support the hatchery programs as an important part of all SEAK fisheries as they provide opportunity for all user and gear groups to harvest salmon, especially if non hatchery salmon or PST salmon are to be avoided in certain situations.

Proposal 96: I support proposal 96 as it provides a little more opportunity for the troll fleet in the Ketchikan area to harvest AK hatchery produced kings. The Ketchikan area has seen some of the most restrictive changes in its spring troll hatchery access openings and this proposal would offer a little relief. ADFG doesn't object.

I offer these comments on Proposal 225. P 225 does not deal with salmon. It is a request for liberalized bag limits on sablefish. I oppose Proposal 225. Proposal 225 seeks to remove the annual bag limit on sablefish for nonresidents. I see removing the annual limit on sablefish as an invitation for excessive harvest that results in either wanton waste or temptation to market the fish outside the State. I keep some sablefish from my commercial harvest for my home pack, between 4 and 6. At some point, the State and ADFG is going to have to acknowledge that promoting unlimited harvest on fully utilized resources is not responsible management. Sport harvesters can shake the little fish. Commercial fisherman are not allowed to. The commercial harvest of sablefish is limited by two different types of permit and quota systems, in both Federal and State waters. We would like to see the nonresident annual limit maintained as most of the clients are hiring guides to catch the sablefish and there is no limit on the vessel number or guide licenses for harvesting sablefish. Maybe their annual limit should fluctuate with abundance. It shouldn't be unlimited though.

Finally, I offer these comments on the ADFG's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. I support option 1, the status quo, for the troll fleet. The areas that would be restricted under options 2 and 3 would close most of the remaining openers that are available for trollers to access Alaska hatchery produced king salmon in any significant numbers since the current policies for the CSOC was implemented in 2018. These openers are in the Sitka area. They are not in the migration corridors of the CSOC. Part of the reason the northern openers have been allowed to continue with restrictions is that there is no significant harvest of the CSOC. There is little opportunity for trollers to fish after March 15 (until July 1) since the CSOC policies were implemented in 2018. The economic harm to the troll fleet would be substantial if the hatchery access openers were to be closed in the Sitka area. There would be no significant gain for the CSOC. This is a time of the year when trollers, like myself are paying maintenance bills and taxes. This is also one of the only times trollers can access AK hatchery produced kings, kings that trollers help pay for with the 3% enhancement tax. Many of these kings were AK hatchery produced, A higher percentage than any other time of the year. If these openers were further restricted, it would certainly beg the question to me, why are trollers paying hatcheries to produce kings they can't catch? Maybe the folks catching those kings should pay for them.

Thank you all for reading these comments. I apologize for the length. I know you all have a lot to read and a lot to think about. There was a lot for me to comment on. Thanks for your patience. I hope you remain healthy.

Sincerely,

James Carter Hughes

FV Astrolabe

Sitka



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

I live in Petersburg, Alaska, and I participate in the subsistence and sport salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is a great boon to our community!

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.

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

Sincerely,

James Stolpe
jdstolpe@hotmail.com

Submitted By
Jamiann Hasselquist
Submitted On
12/21/2021 10:02:27 PM
Affiliation



PC156
1 of 1

I remember as a child my mom would have us kids go down to the beach at Auke Bay where the ferry terminal is located now, to get a bucket of herring. Herring were abundant, we could dig for clams in that area too, but not anymore. The herring on gone from that area, they've been fished out and they continue to be fished out near Sitka.

As Indigenous peoples who have lived off this land for time immemorial we have responsibly harvested. Our ancestors managed our food sources, they never took more than what was needed, they hought of the future, and we were never hungry- until colonization and genocide.

These are not easy conversations to have, nobody wants to learn about how their ancestors of colonialism caused such great harm to other humans in order to gain profit from land and resources or how people today continue to perpetuate the cycle of harm to our communities and resources- resources I feel we as Indigenous peoples have an inherent right too, but we must have these conversations in order to understand how we have arrived to this place of over harvesting for commercial profit, for industrialization.

We must consider the future, for the people who live here, for the health of the ocean for not only Alaska, but the entire world.

Lead with your heart.

Submitted By
Janalee L Gage
Submitted On
11/3/2021 4:45:07 PM
Affiliation
Resident of Alaska and Ketchikan

Phone
9072040635
Email
janaleegage@gmail.com
Address
2512 3rd avenue
Ketchikan, Alaska 99901



PC157
1 of 2

Dear Board of Fish,

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

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

As a 6th Generation Alaskan who is a mere 55 years old, I remember being ten years old in Ketchikan and running down the Bar Harbor in Ketchikan and netting Herring. When it was so thick with Herring, one scoop would be hard for my ten-year-old hands to pull up and would yield well over 40 or more herring. I remember the joy when I would run home, and grandma would pickle, fry up, and or smoke these guys.

I am of Norwegian descent, and Herring is a massive part of my heritage, but I haven't eaten Herring in years due to the lack of them in our community. Due to the overfishing of them by commercial Sac Roe. In as little as 45 years, we have seen the devastation firsthand of our Herring, which, if Karma had a say, has reduced our communities' Salmon and other Seafood supplies.

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

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

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

I fully support 93, 142,146, 147, 148, 170,234.

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

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



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

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

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

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

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

We have a responsibility to our community members to make sure that our resources are protected and solvent for generations to come. Over the last 25-35 years the people of Southeast, have fought to protect our land and water from the devastations seen in other parts of the world and lower 48. It is time the board of fish stop ignoring what the Sea Lice fishery has done to other parts of the world.

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

We can not become dependent on commercial Grocery stores, and processed foods. If you believe in the idea of freedom, the freedom to live off the land should be our number one protected right.

Respectfully and Sincerely,
Janalee L Minnich Gage

Submitted By
Janessa Newman
Submitted On
12/22/2021 9:57:30 AM
Affiliation



PC158
1 of 1

Phone
9073222302
Email
Jnnewman@alaska.edu
Address
9767 front st
Rampart, Alaska 99767

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. Fishing of all kinds is vital to Indigenous well being and mental health.



December 22, 2021

Alaska Department of Fish and Game
Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: Comments on Southeast Shellfish and Finfish Proposals January 4-15, 2022

Dear Madam Chair Carlson-Van Dort and Board of Fisheries Members,

My name is Jared Bright and I have been fishing in Southeast Alaska for 30 years. I participate in Tanner crab, red king crab, golden king crab, and Dungeness crab fisheries. My boat also fishes for sablefish in Northern and Southern Southeast Inside waters as well as in the federal Individual Fishing Quota fishery. All of the following proposals affect my businesses.

Proposal 195

After reviewing at the King and Tanner Task Force meeting on December 3, 2021, a discussion took place between industry and ADF&G staff. It was agreed that Proposal 195 would include language to insure that it would be closed by April 1st to avoid molting/mating period.

Proposal 197

In 2003/2004 the Department began setting different season lengths for core and non-core areas. Core areas were ones with historically high effort and harvest while non-core zones were given an extended amount of fishing time to allow for exploratory fishing and non-traditional fishing grounds.¹

The core/non-core management style has worked well for the last 18 years. Fishermen 'explored' the non-core areas and have found Tanner crab outside the core areas, but because Southeast is such a large area, many areas and 'sub-areas' remain unexplored. My intent with this proposal was not to oblige the department to assign and describe new exploratory areas by EO before each season, but much like they did in 2003/2004 designate non-core areas that are not receiving any effort as 'exploratory' to allow extra time to explore in these areas. Simply stated, adding a third-tier to the two-tier system.

Proposal 200

¹ ADF&G (Alaska Department of Fish and Game). 2021. *Alaska Department of Fish and Game staff comments on regulatory proposals, Committee of the Whole—Groups 1–8 for the Southeast and Yakutat Finfish and Shellfish Alaska Board of Fisheries Meeting, Ketchikan, Alaska, January 4–January 15, 2022. Alaska Department of Fish and Game, Regional Information Report No. 1J21-15, Douglas.*



I oppose this proposal. The Klawock ADF&G AC described the area that they wish to close as an 'exceedingly small area' and again as a 'small area'. According to my calculations the area is nine miles long and 4.5 miles wide at its widest point. I would not consider this area 'exceedingly small' or 'small'. It's a very large area that will have an impact on the commercial Dungeness fleet. It is hard to follow the logic of closing a commercially viable area to crabbing around Prince of Whales. This will only contribute to an already depressed economy in the area.

Proposal 201

As a commercial fishermen that has harvested crab in this proposed closed area, I oppose this proposal. There is already a very large Special Use Area around the Sitka Area. From a technical paper from the ADF&G Subsistence division on non-commercial harvest of crab, "mapped information that non-commercial crabbing mostly occurs relatively close to communities, especially in sheltered bays and coves that can be reached in small boats and are protected from severe weather."²

The new area proposed by the Sitka ADF&G AC is 30 miles from Sitka. This will only add to their problem of fuel expense.

Proposal 202

I support Mr. Roddy's proposal. With less than 150 residents the current closed area far exceeds their needs. Leaving the area closer to town closed to commercial fishing seems like a good compromise.

Proposal 203

I support Mr. Roddy's proposal. Closing a bay that has produced 12,877 pounds of crab for a community that harvests 299 pounds seems a bit excessive.

Proposal 205

I oppose this proposal. The East POW ADF&G AC states in their proposal that the commercial fleet would not be impacted by this closure. That is untrue. We are impacted by each and every closure.

Proposal 207

I oppose this proposal. The East POW ADF&G AC states in their proposal that the commercial fleet would not be impacted by this closure. That is untrue. We are impacted by each and every closure.

According to a technical paper from the ADF&G Subsistence division on non-commercial harvest of crab, "while harvesting appears to be a year-round activity in some communities, most

² George G., M. Kookesh, D. Mills, and J. Fall. 1985. *The Non-Commercial Harvest of Crab in Southeast Alaska: A Summary of Available Information*. Alaska Department of Fish and Game, Division of Subsistence, Technical Paper Number 103, Juneau.



harvesting occurs during months with relatively mild weather, from May through October.” The proposed closed area is already closed May, June, July, August, and September; 83% of the milder weather months. This gives sufficient time to harvest the 14.2 pounds per person currently used by residents of Whale Pass before the commercial opening according to RC2.

Proposal 208

I oppose this proposal. First, I would like to address a couple of the claims made by East POW ADF&G AC:

1. ‘The commercial Dungeness fleet would not be impacted by this small closed fishing.’ 93% of all Dungeness crab harvested in District 2 from 2011-2021 came from statistical area 102-60. I participated in the fall Dungeness fishery in area 102-60 in 2020. Over 50% of our crab came from this proposed closure.
2. ‘Supplement the high cost of living and depressed economy on Prince of Whales Island.’ It is hard to follow the logic of closing an area that produces over 50% of the crab caught in statistical area 102-60, the most productive spot in all of district 2. Further depressing the economy of Prince of Whales.

As I noted previously from ADF&G’s Subsistence Division, “while harvesting appears to be a year-round activity in some communities, most harvesting occurs during months with relatively mild weather, from May through October.” The proposed closed area is already closed May, June, July, August, and September; 83% of the milder weather months. This gives sufficient time to harvest the 22.8 pounds (about 10 crab) currently being utilized by the residents of Kasaan, according to RC2, prior to the commercial opening. To further put this in perspective the area proposed for closure produced an average of 31,967 from 2011-2021.³ There are 72 residents of Kasaan using 22.8 pounds of crab each year, that is 1,641.6 pounds annually.

District 2 - Dungeness harvest in past 10 years

(less than three permits fished in red - * CONFIDENTIAL)

| DOL Month | District Number | Whole Weight (sum) 2011 - 2012 | Whole Weight (sum) 2012 - 2013 | Whole Weight (sum) 2013 - 2014 | Whole Weight (sum) 2014 - 2015 | Whole Weight (sum) 2015 - 2016 | Whole Weight (sum) 2016 - 2017 | Whole Weight (sum) 2017 - 2018 | Whole Weight (sum) 2018 - 2019 | Whole Weight (sum) 2019 - 2020 | Whole Weight (sum) 2020 - 2021 | Whole Weight (sum) 2021 - 2022 |
|--------------------|-----------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|
| A - January | 102 | | | | | * | * | | 895 | * | | |
| B - February | 102 | | | | | 4,242 | | | 1,394 | 3,962 | | |
| C - March | 102 | | | | | | | | | | | |
| D - April | 102 | | | | | | | | | | | |
| E - May | 102 | | | | | | | | | | | |
| F - June | 102 | | | | | | | | | | | |
| G - July | 102 | | | | | | | | | | | |
| H - August | 102 | | | | | | | | | | | |
| I - September | 102 | | | | | | | | | | | |
| J - October | 102 | 60,406 | 25,957 | 51,581 | 106,888 | 40,829 | 69,269 | 74,106 | 59,525 | 87,464 | 78,472 | 70,730 |
| K - November | 102 | 12,719 | 12,446 | 31,015 | 19,369 | 5,161 | * | * | 7,676 | 5,126 | 3,754 | 3,858** |
| L - December | 102 | * | * | * | * | 1,982 | * | * | 635 | * | * | * |
| Grand Total | | * | * | * | * | * | * | * | 70,125 | * | * | 74,588** |

**Preliminary harvest through December 15, 2021, Dungeness fishery in District 1, 2, and Section 13-B outside of the SSSUA are open through February 28, 2022.

³ From personal contact with ADF&G



102-60 - Dungeness harvest in past 10 full seasons, plus 2021
(less than three permits fished in red - * CONFIDENTIAL)

| DOL Month | Stat Area | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) |
|---------------|-----------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| | | 2011 - 2012 | 2012 - 2013 | 2013 - 2014 | 2014 - 2015 | 2015 - 2016 | 2016 - 2017 | 2017 - 2018 | 2018 - 2019 | 2019 - 2020 | 2020 - 2021 | 2021 - 2022 |
| A - January | 010260 | | | | * | * | * | | 895 | * | | |
| B - February | 010260 | | | | * | 4,242 | | | 1,394 | 3,962 | | |
| C - March | 010260 | | | | | | | | | | | |
| D - April | 010260 | | | | | | | | | | | |
| E - May | 010260 | | | | | | | | | | | |
| F - June | 010260 | | | | | | | | | | | |
| G - July | 010260 | | | | | | | | | | | |
| H - August | 010260 | | | | | | | | | | | |
| I - September | 010260 | | | | | | | | | | | |
| J - October | 010260 | 60,406 | 25,457 | 49,755 | 101,885 | 31,988 | 69,269 | 72,609 | 59,525 | 87,464 | 74,193 | 70,730 |
| K - November | 010260 | 12,719 | 12,446 | 31,015 | 18,318 | 5,161 | * | | 7,676 | 5,126 | 3,754 | 3,858** |
| L - December | 010260 | * | * | * | * | 1,982 | * | | 635 | * | * | |
| Grand Total | | * | * | * | * | * | * | 72,609 | 70,125 | * | * | 74,588** |

**Preliminary harvest through December 15, 2021, Dungeness fishery in District 1, 2, and Section 13-B outside of the SSSUA are open through February 28, 2022.

Proposal 214

I oppose this proposal. As much as I appreciate clarity, I do not believe this is a good proposal. I currently fish 300 round Dungeness pots, but believe that the door for innovation should always be left open. Changing the language from diameter to perimeter would accomplish the same clarity without stifling innovation.

5 years ago no one had ever heard of a 'slinky' pot. 'Slinky' pots completely revolutionized the sablefish industry. If blackcod pots had been defined as 'rigid' that would not have happened.

Proposal 220

I support this proposal. Pots are a much more sustainable, cost effective way to harvest sablefish.

Proposal 221

I do not support this proposal as written. I understand the Department did a short, sample size study on escape ring size effect on fish harvested. My boat has hauled thousands of sablefish pots (both rigid and slinky) and I have sold thousands more to 50 different customers.

After our initial experience with small fish we started ordering pots with 12 escape rings. These have eight 90cm (3.5") and four 80cm (3.1") escape rings each. That was how we sold our first 6,000 slinky pots. After feedback from my own boat and input from many of our customers we have changed to eight 80cm (3.1") escape rings for the last 4,000 pots.

It is amazing how big of a black cod can squeeze out of a little hole. We fishermen get paid significantly more for larger fish. We don't want to catch small fish, but we also don't want to lose big fish out of our pots.



Eight 80cm (3.1") escape rings will let out the smaller fish and retain the market size fish better than two 3.75". The department support pots, which have shown to catch less bycatch and prevent whale predation. Less people will use pots if required to use oversized escape rings and they will continue to catch and retain fish off all sized with hooks.

Proposal 232

I support this proposal. The department may not have a stock assessment for spiny dogfish, but as a year round Southeast fisherman, I can tell you they are at a very high abundance currently. This year all the salmon seiners in Clarence Strait struggled to avoid the large school of spiny dogfish. I personally had a set of an estimated 40,000 pounds of spiny dogfish. I had to let the end of my net go and lost any salmon I may have had in there. At the very least, I would like to see a plan for a stock assessment of spiny dogfish, if the department believes one is necessary to open a fishery.

Thank you for considering my comments.

Sincerely,

Jared Bright
F/V Obsession
ADF&G KTTT Co-Chair
Slinky Pot Inc

A handwritten signature in black ink, appearing to read "Jared Bright", written over a light blue horizontal line.

Submitted By
Jared Jillie
Submitted On
12/17/2021 7:22:01 AM
Affiliation

Phone
9072206449
Email
jillieman@msn.com
Address
P.O. Box 5933
Ketchikan, Alaska 99901



PC160
1 of 2

I, Jared Jillie, current troll permit holder strongly oppose measure 83.

Submitted By
Jared Jillie
Submitted On
12/17/2021 7:45:23 AM
Affiliation



PC160
2 of 2

Phone
9072206449
Email
jillieman@msn.com
Address
P.O. Box 5933
Ketchikan, Alaska 99901

I, Jared Jillie, current power troll permit holder strongly oppose measure 89. Please don't allow permit stacking. Traditional trollers (smaller non-freezer boats) already have to compete with the larger vessels. Being that there is no vessel size/length limit the larger boats already have an advantage being able to fish in rougher water. These larger boats are taking a bigger percentage of the quota as is. Please keep it a level playing feild. Most of the support for this measure is from large freezer boat owners. I am also concerned that this will increase the cost of permits making it even harder for young fisherman to get a permit. Thank you.

Submitted By
Jason Baldwin
Submitted On
12/22/2021 7:03:32 AM
Affiliation



PC161
1 of 1

The state cannot go far enough to protect the natural resources of Alaska. The true value of Alaska is in its untouched resources. Not for further use but for their innate value.

Submitted By
Jaycen Andersen
Submitted On
12/21/2021 10:38:19 AM
Affiliation

Phone
(907)738-0706
Email
cinnabarfisheries@outlook.com
Address
P.O. Box 99
Sitka, Alaska 99835

Comments on Board of Fish Proposals

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

My name is Jaycen Andersen. Owner of the F/V Toni Marie. Fourth generation fisherman, father and local Alaskan. I want to thank you for the opportunity to comment on the proposals submitted before you. Merry Christmas and many blessings moving forward.

Proposal 80- Support

Please, start the discussion. I want to see individual gear groups held accountable for their own overages. Might want to more closely monitor sport harvest from remote lodges. And the ever growing non guided sector. You'll hear that reminder a couple times through out;

Proposal 82-Support

I support 82 with the two amendments suggested by the Sitka Advisory committee that protect access for resident sport anglers. Specifically, to apply resident priority as a management objective at all levels of abundance. 5 AAC 47. 055 (b)(6) *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.*

And to delete the proposed July 1- July 31 resident closure that would apply to years when the CPUE is 2.6-3.8 out of 5 AAC 47 .055(g)(2)

Under this proposal, I support a plan where sport bag limits will be set by the Commissioner at the beginning of the season based on that years sport allocation adjusted for any prior underage/overage.

Proposal 83- Strongly oppose

Flawed. Unrestricted growth in the guided and non guided sport sector. Without limited entry for the guided sport sector and non guided sector, the 80/20 will never be achieved without flexible bag/annual limits. The numbers today aren't like the ones referenced in previous management. The authors of this bill had representatives for the recreational sector when it all went down. They are well aware that the latest PST agreement requires that all user groups make due with less. I'm already giving them more than their deserved share of my hatchery kings. They pay nothing into the production of our hatchery produced salmon, yet get to benefit from them financially. For them to ask more now; especially with the stocks of concern being an issue also, is strictly greed based. The assumption that there will be an equal amount of high abundance years verse low abundance years is also bs.

Proposal 84- Support

I support resident sport fishermen over nonresident. Also in full support of requiring daily electronic catch reporting. All the trollers numbers are accounted for at the dock. No arguing the numbers. With the ever growing number of non guided anglers this is extremely important to the management of our King Salmon and to hold user groups accountable.

Proposal 85- Support

Again, residents first.

Proposal 88- Oppose

Oppose for similar reason to 83. Both of these proposals would lead to unjustified reallocation of king salmon.

Proposal 96- Support

Trollers pay for them, shouldn't one get a whack at them?

Proposals 101 & 103- Strongly oppose

Lack of evidence in straying numbers. Like as in none. I fully support our hatchery programs here in Southeast Alaska that keep our communities alive and our hatches full.

Proposal 115- Oppose.

Personal reason for me. More opportunity for me and my fishing schedule to leave it as be.

Proposal 117- Support

Facts are facts. Give them their 2 extra lines, I wanna watch. (If you're concerned those couple extra lines are going to send them over their allocation, you can sleep easy knowing it won't do that much damage)

Proposal 144- Support

Keep these guys honest. With an ever growing non guided sport sector, it is critical that we manage them and treat them the same as we would the guided sector. You can't try and manage a resource if you're not managing the fleet.

Proposals 171,172, & 173- Strongly Oppose

Let me get this straight. The short, quota based, with strict in season management is to blame for this supposed stock decrease? Because of harvest by the commercial sector during a time when the females are bearing eggs? I'm not buying it. Shrimp run in cycles. Historically speaking, I see no reason of concern that makes me want to switch up the season. Shrimp can be a lucrative opportunity, so conservation is priority. I think the sponsors have great intentions, but aren't recognizing the larger threat to the shrimp. Take a look at the growing number of sport guys coming up and spending all summer shipping friends in and out, constantly fishing. No accountability. Sport lodges with shrimp gear out all summer long to feed their clients. Floating lodges harvesting, Resident sport guys filling freezers with unlimited amounts until recent changes. Ocean changes and Unregulated growth in so many areas and some want to point the finger at a quota based harvest by the commercial sector? How ignorant or biased could one be? Or is it a few who would rather it be for personal business decisions other than actual concern for the stocks?(e.g. would rather fish in spring than fall) I have other fisheries I could personally move around to accommodate, would it be an inconvenience? Hell yeah, but that's not why I'm arguing against. Reasons. It wouldn't matter if we caught that shrimp before it spawned 5 months prior. It's still dead and not going to spawn again anyways. The quality won't begin to compete as they've just gone through a molt at this time and shells are much softer. More opportunity for freezer burn. Since all the eggs are now gone, guess what?! So is the weight. They'd be stupid to think ADF&G are going to give us the same weight allowance. A lot of these areas that are shrimping grounds also have spring troll fisheries occurring. Nothing more a troller loves than buoys! My main argument against is because none of these sponsors to the various closers and season change proposals; have acknowledged any other factors or acknowledge the reasons why one wouldn't have a spring shrimp fishery(over fishing in certain areas of sport/subsistence/personal use or reasons stated above) Making this change to the season dates would be as experimental as the mRNA vaccine.

I've included my replies to the additional benefits that the Sitka advisory committee and another had included.

1Enhanced management of the fishery.... -Change the survey time if that's the concern. I'm involved in many fisheries and in my opinion, not many of them get the scrutiny and on the fishing grounds management that the shrimp fishery (ADF&G on that one. I'd be interested to hear their take on this.



2. More opportunity for local market- local markets get what they want. And only so much shrimp can be consumed fresh, so its frozen anyways. Actually, end of year sales are probably your highest. All the major holidays are after our fall fishery. Local/domestic or otherwise, it shouldn't matter if we're arguing for stocks of concern. Getting rid of Alaskan Spot Prawns is not an issue.
3. Safer weather and more participation opportunity for smaller boats- Weak argument since the vast majority is caught on inside waters. Might as well only permit certain weather conditions in order to participate in all fisheries! I love the flat calm. Or could this be the argument that the crabbers are making because they'd like to have an open schedule to fish.
4. A more viable product for US markets... - That itself is a marketing issue, not board of fish issue. I can find people to argue that they love and prefer a shrimp with the roe.

Proposal 174-Strongly oppose

Again, many variables. I'm tiring of hearing about BC's remarkable sustainable shrimp fishery. Show me the numbers. My talks with BC fishermen, buyers/processors tell me differently. "As British Colombia has proven, shrimp stocks remain sustainable only if the egg bearing females are allowed to release their eggs prior to an open commercial fishing season" One of the most idiotic statements I've read within these proposals. "ONLY if the egg bearing...?!!" Thats a pretty strong statement. Only. What kind of nonsense is that? I could go and kill the run in the spring when they're spawned out. Eggs or not, they dead. Greater factors are not being considered and I ask these sponsors to recognize this. All the written arguments for proposals 171-174 are flawed at best. No data to back these claims. There are 2 things we do know. Constant changing ocean conditions and fish have tails, and use them. The sponsor of this proposal also claims "when asked, a large percentage of the commercial shrimp fishermen support a spring shrimp fishery in Alaska. I was never asked this question. Was there a survey I missed? I do not support.

Proposal 175- Strongly oppose.

It doesn't matter what configuration my gear is in. It's going off fast. We're only allowed so much time to fish. By trying to limit fishermen to 10 pot strings, all it will do is make a guy take up more realstate and more buoys for entanglement issues. I don't see how it will slow the pace or how it would provide gear standardization between large and small vessels. Like I said, you name the configuration and I'll still set my gear just as fast.

Proposal 176-Strongly oppose

Again, I see nothing. [REDACTED] states its turned into a derby. False. It's a quota based managment fishery. Reducing the number of pots isn't going to change the outcome. 1000lbs is still 1000lbs, whether it comes up in 1 pot or 100 pots. I feel a small boat bias going on here. He states it would reduce the daily catch. The only thing I can agree with. And how that would make any difference for fishery managers determining catch day to day is beyond my pay grade. The math provided does nothing for me either. Not following

Proposals 177,178,179- Strongly Oppose.

Am I the only one the see's the personal use/sport bias within these proposals surrounding POW?(all shrimp proposals for that matter) Close the quota based commercial fishery so we can have an unlimited whack at the resource till it's gone! That's what I'm hearing.

Proposal 217- Support

More opportunity for trollers to make an extra buck off bycatch. Like my grandfather would say, "Just as easy to put 2 bits on board as it is to shake it." Easier actually, Gramps. Numbers show that in 16 years, only 79lbs of lingcod was landed on a Jig card. Not a sustainable lifestyle!

Proposal 219-Support

Reduces rockfish waste. All in the name of conservation.

Proposal 224- Support

Why not allow for personal use only? There's a lot of joy in jigging up a rockfish, and a lot more when you get to take it home and put it on your plate.

Proposal 225- Oppose

Again, until one controls the unlimited growth, rape, and pillage of the non guided and guided anglers, I don't have time for more wants. I wanna, gimme gimme. All for the electronic reporting though. Keep'm honest.

Proposal 227- Strong feelings

Proposal 230- Support

As stated the number of resident anglers in southeast has been stable and isn't showing any signs of great increases. Give the residents an opportunity to feed their families in these ever changing times with increased prices in protein based foods especially. If stock numbers allow, I say let them eat.

Proposal 241-

How would one enforce an amount if the definition was shrimp as a whole, since most discard heads and only retain tails? "Currently the limits are set on "Shrimp" and the undefined term is being mistaken as meaning a shrimp tail." How can it be mistaken if there isn't a definition?? I would ask the department for their definition.

Proposal 276- Support

It's ridiculous that I can't have a fish onboard to consume that comes up dead on the hook. Yes, mortality is a fact and it's a shame to let it go to waste when it could feed my crew and I. Did I mention my crew my family. I could feed my family the greatest source of clean protein and vitamins, instead it goes to waste. Please adopt this. Hell, it's easier than an app. Just record them on the back of our sport license like I would if I was in my skiff. We can report at the end of year if needed.

In closing, I'd like to comment on ADF&G's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. I support option A, the status quo, for the troll fleet. The areas that would be restricted under the Increased Management Options would close most of the areas that remain available for trollers to access Alaska Hatchery produced King Salmon. Not the SOC.

There has been very limited opportunity for trollers, like myself, to fish between March 15 and July 1 since the SOC policies implemented in 2018. There would be no significant gain for the SOC if the Sitka area was closed to hatchery openers who have a chance at getting our money back out of our paid for and produced King Salmon.



PC162
5 of 6

Thank you for reading. Blessings,

Jaycen Andersen

F/V Toni Marie



Submitted By
Jaycen Andersen
Submitted On
12/22/2021 10:37:10 AM
Affiliation

Phone
9077380706
Email
Cinnabarfisheries@outlook.com
Address
P.O. Box 99
Sitka, Alaska 99835

madam chair and board,

Apologies for the confusion. On my first set of comments I stated on prop 82 that I support and under the comments added that I only support it with two amendments. Just wanted to make clear that it was supported with amendment only. Thank you and forgives me,

Proposal 82-SUPPORT WITH AMENDMENTS

I support 82 with the two amendments suggested by the Sitka Advisory committee that protect access for resident sport anglers. Specifically, to apply resident priority as a management objective at all levels of abundance. 5 AAC 47.055 (b)(6) *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.*

And to delete the proposed [July 1- July 31](#) resident closure that would apply to years when the CPUE is [2.6-3.8](#) out of 5 AAC 47.055(g)(2)

Under this proposal, I support a plan where sport bag limits will be set by the Commissioner at the beginning of the season based on that years sport allocation adjusted for any prior underage/overage.

Submitted By
Jed DeLong
Submitted On
12/22/2021 7:09:06 PM
Affiliation



PC163
1 of 1

Herring in Sitka sound appears to be overfished. This has happened in countless other herring fisheries around the state, other areas in the US and probably elsewhere. ADFG is constantly touting what great management we have, yet nearly all of our fisheries, from king salmon, to halibut, to black cod, rockfish, and of course herring are not nearly what they were when I was a child 25 years ago. I'm tired of seeing conflicts of interest in state management positions, fish surveys, and lobbyists. Subsistence needs and residents seeking to fill there freezers should trump all commercial interests, including out of state "sport" fishing (charters). Herring is the bottom of the food chain, although it is not, to my knowledge, managed as a forage fish. I strongly oppose the sac row fishery. It is a bunch of wealthy fishermen profiting off of a public resource and decimating it.

I grew up snowboarding in Sitka, and spring is usually the best. We could always see the huge plumes of spawn around Sitka sound from the mountains. However, there is now little if any visible spawn during the herring season. I'm tired of fisheries management being a political entity the simply bends to the whims of the moneyed. Please take the courage to stand up to the money and use conservative scientific management practices. We won't get another chance if you blow it. Thank you, Jed

Submitted By
Jeff Farvour
Submitted On
12/22/2021 5:40:27 PM
Affiliation



PC164
1 of 2

Phone
9077380898
Email
jefarv@gmail.com
Address
439 Verstovia Ave
Sitka, Alaska 99835

December, 22nd, 2021

Comments on proposals 82, 83 and 117

Dear Members of the Board,

My name is Jeff Farvour, I am the author of Proposal 117. I fish for food and livelihood out of my community of Sitka with salmon trolling as my primary (and nearly sole) source of income.

Comments starting in reverse order:

Proposal 117- **SUPPORT**

While I clearly and strongly support this practical proposal and agree with ADFG staff comments, the below two points are to clarify that in fact, the intent of proposal 117 is to:

1. **Prohibit the retention of king and coho when vessels are utilizing the proposed provisions of this proposal (running two extra lines) while commercial chum trolling in these three chum areas, and**
2. **All provisions and restrictions would apply to both commercial power and commercial hand troll.**

Regarding #1 above, the potential concern that this provision may present undue enforcement concerns could easily be alleviated by the fact that cohos and especially kings harvest is relatively de minimis in these areas. If additional marking of the vessel using this proposed provision, or other practical options, would help alleviate any additional enforcement concerns then those may be a reasonable contribution as well.

Also, as opposed to many proposals the Board will be entertaining at this meeting, please consider the following. As far as can I am able to determine:

- There are no treaty issues with this proposal
- There are no conservation issues with this proposal
- There are no consolidation issues with this proposal
- Utilization of this provision is an option- not a requirement. For some it will work, for others it may not, just as trolling deep for kings or running two extra lines at the fairweather grounds
- Because of our gear limitations, trollers are chronically under our allocation of enhanced fish. There are very few other viable tools available to the troll fleet to help achieve greater efficiency and success in harvesting our allocation

Proposal 83- **Strongly OPPOSE**

Reasons to strongly oppose to this reallocation proposal are lengthy for this fully subscribed species. Amongst them are:

- It's a flat out reallocation in times of lower abundance
- It's likely that we will be in a lower abundance scenario for the foreseeable future
- This proposal is especially damaging under low abundance when everyone is suffering except that trollers would suffer more
- It would set the precedent that under times of lower abundance that the charter sector is prioritized over commercial trolling
- 86% of commercial troll permits are owned by SE residents
- There are troll permits residing in nearly every, if not all, SE communities
- The charter sector does not "need" anything except to control their industries impacts on other sectors
- The proposal invites the same community outrage and offense as other charter reallocation proposals such as past halibut issues
- The Wild Fish Conservancy lawsuit seems likely to change things for the worse, even in the best of scenarios

Proposal 82- **Support with amendments**

I support this proposal conditional on the adoption of the 2 amendments proposed by the Sitka AC.



PC164
2 of 2

Sincerely, Jeff Farvour

F/V Apollo

Sitka, AK

Submitted By
Jeff Wedekind
Submitted On
12/22/2021 3:01:52 PM
Affiliation
Chinook Shores, Inc.



PC165
1 of 1

Phone
9076174850
Email
chinookshores@gmail.com
Address
25 Potter Road
Ketchikan, Alaska 99901

Chair Carlson-Van Dort and members of the board,

My name is Jeff Wedekind, I came to Alaska in 1979 to go fishing and never left. I've fished on seiners, long liners and crabbers from Ketchikan to the Bering Sea. My family owns Chinook Shores Lodge located in Ketchikan. We built the lodge in 2005 and have been operating successfully for 16 years. We have 6 seasonal employees, 3 full time employees and hire multiple local contractors, fishing guides, mechanics, and professional services. We accommodate 30 guests and operate nine rental boats and own one charter boat with a CHP.

Sport fishing is our sole source of income and we spend most of that revenue in our local town. We purchase a lot of groceries, hardware, building materials, marine engines, fishing tackle and we pay a lot of local sales and property taxes. Our guests will often times spend a few extra days in Ketchikan staying at hotels or B&B's and dine out at the local restaurants. It's fair to say that our business and similar operations pump a lot of dollars into our local economy.

King salmon fishing is a major attractant to Alaska, and during the month of June and early July, it is often the only salmon available. Having stable, reliable fishing opportunities for our guests is critical to our business. We are not commercial fishermen who are able to take advantage of additional harvest in times of high abundance, and because we market opportunity, we cannot afford to have our season completely shut down in times of low abundance.

I support Proposal 83, which avoids in-season management and keeps some level of opportunity for sport anglers during times of low abundance while the commercial trollers take advantage of additional harvest in times of high abundance to achieve an average 80/20 split between trollers and sport anglers. This also benefits resident anglers as well as nonresident.

I do not support Proposal 82, which has the ability for in season management for sport anglers and can effectively shut down the fishery. Lost opportunity for king salmon means losing guests at our fishing lodges.

I do not support Proposals 144, 145, and 277. A log book program for rental vessels is not an efficient method to capture catch data. Isolating just one sport sector only gives a small window into the harvest of the sport fisheries. I agree that there has been an increase in rental boats, however, there has also been a huge increase in personal use boats in saltwater fisheries. I would support a fish ticket program that all sport and personal use anglers filled out and turned into the ADFG via paper ticket, log book or electronic application. Singling out only one sector of the sport fishery because they rent a boat seems to aim more at attacking a business model rather than collecting harvest data to effectively manage a fishery.

Proposal 277 is the same proposal that was rejected at the 2019 NPFMC meeting in Anchorage. I do not understand why this proposal is up for consideration at the BOF meeting as halibut bag limits are not regulated by the state.

This proposal discriminates against residents that can't afford to own a boat and it discriminates against non-residents accessing a federally managed fish. It penalizes anglers for renting a boat without the benefit of having a USCG Captain/guide on board or the ability to safely fish in the same waters that many of the guides access. Also, anglers renting boats don't have access to GAF halibut like CHP holders do.

Proposal 277 is an unsubstantiated attack on a business model that has been around for 70 years. If we are going to realign bag limits, then we need to bring everyone into the CSP and realign bag limits of all sport anglers. There is nothing to gain by fractioning off another subsector of the sport fleet based on perception.

Submitted By
Jeff Wolfe
Submitted On
12/15/2021 7:04:49 PM
Affiliation



PC166
1 of 1

Phone
9077386300
Email
jeffwolfeman@hotmail.com
Address
118 Erler st
Sitka, Alaska 99835

To: State Board of Fish and Game

My name is Jeff Wolfe. I am an Alaska native, born and raised in Sitka, Alaska where I still currently live and commercial fish and crab. I strongly **Oppose Proposal 201**, along with all the other Dungeness crab closure proposals. (205,207,208,210).

I oppose this because the commercial Dungeness crab fishery is very important to this region. There are lots of permit holders, deckhands and a huge shoreside element that employ a considerable amount of people involved in crab processing. There are also a number of crabbers that sell their crab caught in this area off the dock to the residents of Sitka, many whom don't have their own boats or gear to go harvest crab themselves. All these people that depend on this accessible resource would be impacted in a negative way. With every single area that is closed to commercial crabbing, it becomes near impossible to meet the threshold required under the current crab management plan to have a complete crab season.

I have been commercial crabbing in this area for the past 13 years with two deckhands. Additionally, there are numerous other crabbers sharing these waters. This area has been historically utilized by commercial crabbers for the past 35 plus years, with commercial crabbers fishing alongside the few sport and subsistence crabbers who choose to travel the 25-40 miles to get to these fishing grounds.

This is an imperative area to new fisherman entering the fishery. It is the closest area to Sitka that can be commercial crabbed. There are already huge areas that are closed to commercial crabbing all around Sitka but remain open to sport and subsistence crabbers so they do not have to incur the huge expense of traveling 25 plus miles away to catch some crab.

Oppose Proposal 201; keeping this area open to all user groups that have traditionally crabbed in the area is the best policy.



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

I participate in the commercial salmon fisheries of the Southeast region.

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.

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,

Jeffrey Golden
justgoldj1@aol.com
(360) 201-5479



Submitted By
Jeffrey Short
Submitted On
12/22/2021 1:20:21 PM
Affiliation
JWS Consulting LLC

Phone
9072093321
Email
jwsosc@gmail.com
Address
19315 Glacier Hwy
Juneau, Alaska 99801-8202

Dear Board of Fisheries,

I am an environmental research scientist holding a M.S. in physical chemistry and a Ph.D. in fisheries science, and I have lived on the shoreline of Tee Harbor, just north of Juneau, Alaska, for more than 40 years. During this time I have watched the Lynn Canal herring stock, once one of the three strongest stocks in all of southeast Alaska, dwindle to almost nothing. Having published on the importance of clupeid forage fish in neritic food webs in the peer-reviewed scientific literature, I have a keen appreciation for the crucial role these species so often play. In particular, I believe that a moratorium on commercial fishing for herring in southeast Alaska would promote recovery of the severely depleted stocks beyond the Sitka stock, and could lead to a much more productive marine ecosystem that would provide considerably greater benefits to all stakeholders and rights-holders once these other stocks have fully recovered.

Alaska's constitution requires sustainable management of the state's fish and game resources. The relentless decline of southeastern Alaska's herring stocks under state management is clearly inconsistent with this mandate. Continuing to authorize a commercial fishery on the Sitka stock, the last remaining strong stock in southeast Alaska and thus the last large source of recruitment for rebuilding the seriously depleted stocks elsewhere in southeast Alaska, is unconscionable. In light of this, I ask in the strongest possible terms that the Board adopt herring proposals 156, 157 and 158, and reject proposals 159, 160, 161, 163, 164, 165 and 166.

Thank you for this opportunity to comment,

Jeffrey Short, Ph.D.

Submitted By
jerry foster
Submitted On
11/2/2021 12:34:22 PM
Affiliation



PC169
1 of 1

Phone
9072526206
Email
jerry_geri@hotmail.com

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

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

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

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

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

Submitted By
Jesse Hughey
Submitted On
12/21/2021 8:12:51 PM
Affiliation

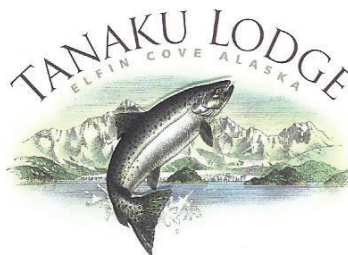


PC170
1 of 1

I am writing today in support of proposals 156, 157 and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by 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.

I also believe that none of these proposals goes far enough to advance respectful stewardship ensure the existence of herring for generations to come. If current practices continue it is only a matter of time before overharvesting destroys this vital resource.



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

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

My name is Jim Benton and I own Tanaku Lodge in Elfin Cove. We are a family run business that employs a staff of 16 and contributes to the economies of Elfin Cove and Juneau. We have operated for 27 years and king salmon has always been an opportunity for our customers. King salmon are critical to my operation all season, and especially early. Kings are one of just a few fish that really attract anglers to come to Alaska.

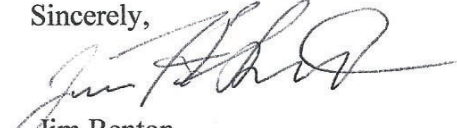
I do not support Proposal 82. I'm concerned about the loss of opportunity for non-residents to keep kings in low abundance under this proposal. Our customers typically book a year in advance. It can be extremely difficult for our business to explain that we do not know what king salmon regulations will look like.

I support Proposal 83 that keeps workable regulations in low abundance and avoids inseason management. Proposal 83 would provide our customers with more certainty year over year. Managing for an average 80/20 split with the commercial sector has worked in the past.

At Tanaku Lodge we want to provide our customers with an overall Alaskan experience. We do not need hefty limits during times of high abundance. We believe resident fishermen should have opportunity to catch plenty of food and non-residents should experience catching a king salmon. Proposal 83 will do this.

I hope the Board can find a fair tradeoff between all user groups. Regulations that keep the king salmon fishery open all season will benefit all fishermen and our local economies.

Sincerely,



Jim Benton

Tanaku Lodge, LLC
P.O. Box 74
Elfin Cove, AK 99825
800.482.6258
907.239.2205 907.239.2253
www.tanakulodge.com
tanaku@msn.com

Submitted By
Jim Bleil
Submitted On
12/20/2021 9:15:20 PM
Affiliation



PC172
1 of 1

I support proposals 156,157, and 158, to better manage the sac roe herring fishery. I am opposed to proposals 159,160,161,163,165, and 166. The herring are the most important bedrock species in Sitka Sound. They support our salmon, our eagles, our bears, our whales, and our trees. Proposals 159,160,161,163,165, and 166 fly in the face of good scientific fact and indigenous knowledge. We need to respect this place and help to keep it as special and wonderful as it is. Decimating one of the most important cornerstone species does a disservice to us all as southeast alaskans. The sac roe fishery is wasteful and short sighted and shameful. Please respect the home we all share. Did you know David Attenborough singled out and bashed the southeast sac-ro herring fishery in the BBC series Our Planet as an example of a wasteful and unsustainable fishery? This was one of the most well funded and widely veiwed naturalist progams that has ever aired. The episode was called "Costal Seas". They had the whole planet to chose from and they chose our Sac-Roe fishery as an example of "A sad tale of unsustainable fishing that has been told time and time again." This is an embarrassment and worth thinking about. We need to do better than this. Thank you.

Submitted By
joan mcbeen
Submitted On
12/17/2021 9:00:02 AM
Affiliation



PC173
1 of 1

Phone
9077362245
Email
joanmcbeen@yahoo.com
Address
po box 23
tenakee springs, Alaska 99841

I support herring proposals 156, 157, 158 and oppose proposals 159, 160, 161, 163, 165, 166. When I moved to Tenakee Springs 45 years ago, I harvested herring eggs around town. After many years of commercial herring fishing and subsequent collapse of herring population, I don't see any roe. Herring feed the salmon we depend on for our subsistence life and must be protected.

Thank you for this opportunity to comment.

JoanMcBeen

Tenakee Springs, AK



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

Support Proposal 166 and 233. Allow existing Sitka sac roe herring seine permit holders to utilize open pound roe on kelp as an alternative to seining and remove the Sitka area from the Northern Southeast roe on kelp administrative area.

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

Changes in the Sitka sac roe fishery should have been made many years ago. The Board of Fisheries has shown support for this proposal in the past but has been unable to act due to existing CFEC regulations.

The Board of Fisheries demonstrated support by writing a letter to CFEC requesting exclusion of Sitka Sound from the administrative area of the Northern Southeast herring spawn on kelp area.

CFEC held a hearing Nov. 6, 2015.

CFEC responded to the Board” After due consideration, the Commission has decided to take no further action on the proposal as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.”

Why was this allowed to happen? The Board of Fisheries has the power to control methods and means of how fisheries take place.

In the minutes of the CFEC hearing which were subsequently provided to the Board, CFEC stated to the hearing participants that the hearing not be about Proposal 126 (the proposal for the Board during that year’s cycle).¹ Because of this reasoning the supporters of the proposal did not send the CFEC any information on the proposal nor did we feel any pressure to fight for our proposal because CFEC stated it was not going to consider it in the reasoning behind determining the area change. Testimony at the hearing proceeded and, as Mr. Twomley explains in his letter of January 8, 2016 to the Board of Fisheries, “Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders.”²

We believe the CFEC should have acted as Mr. Twomley states “We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 – Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.”³

We believe the CFEC overlapping the areas was arbitrary and caprices. Mr. Twomley states “And we went back to our records, asked our staff to search through what we had, and we could not find a stated

¹ This fact is in the transcript of the CFEC Sitka Sound hearing Bruce Twomley: page 2, “Now proposal 126 is not at issue”, page 3 “But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126”

² Twomley letter to Board of Fisheries, January 8, 2016

³ CFEC Sitka Sound hearing Bruce Twomley: page 3



reason for doing that.”⁴ Commissioner Carl Rosier memorandum “The Commissioner made clear the department’s preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock”⁵ The CFEC chose the larger area.

We had the impression the CFEC hearing would be about the area definitions and why the overlap. Some of the concerns of the overlap should have been addressed but were not:

1. The Sitka sac roe seine fishery was first be given limited fishery. The Northern Southeast herring spawn on kelp fishery was years later. Was it right to overlap the areas? Mr. Twomley states “And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute.”⁶
2. Do the areas defined represent the actual fisheries taking place?
3. Would the overlap of the G01A area with the L21A area, years after the G01A area was a limited entry fishery, add more users to G01A an already fully utilized stock of herring?
4. Why would CFEC, intentionally or not, add more effort to the fully utilized Sitka herring stock?
5. Was it a mistake to add the potential of more users to the Sitka limited entry stock?
6. Herring stocks, in Alaska, are managed by the spawning area of that particular stock. Why would CFEC consider L21A, herring stock users also accessing G01A herring stocks?

Myself and many other G01A permit holders feel the Board should support the proposal allowing existing Sitka Seine permit holders the opportunity to harvest their share of the herring resource with open pounds instead of purse seine. CFEC states “If however, the Board of Fisheries decides to go forward with Proposal 126 (the proposal number at the time) or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fishermen would be consistent with the Limited Entry Act.”⁷ We are not asking the Board of Fisheries to allow more effort into the Sitka roe herring fishery. We are asking the Board to allow those already in the fishery to use a different method to harvest their share of the herring resource. The Sitka sac roe fishery has needed to change for many years and likely would have if not for this arbitrary administrative area overlap. Please do what you can to correct this situation which would allow the Sitka fishery to improve and provide more benefit to the community and all participants involved.

Best regards,

Joe Lindholm

G01A Permit Holder

⁴ CFEC Sitka Sound hearing Bruce Twomley: page 3, p3

⁵ Twomley letter to Board of Fisheries, January 8, 2016

⁶ CFEC Sitka Sound hearing Bruce Twomley: page 3, p4

⁷ Twomley letter to Board of Fisheries, January 8, 2016

Submitted By
Joe Willis
Submitted On
12/18/2021 8:44:45 AM
Affiliation



PC175
1 of 1

Phone
(907)518-4652
Email
willisjen@gci.net
Address
PO Box 43
Petersburg, Alaska 99833

Proposal 198

I'd like to thank the Board for reading the RC's and giving us opportunity to clarify on why we've submitted a proposed regulation change. I submitted this proposal to help address some concerns I have and make it a more safe & profitable fishery. My beautiful wife and I became vested in the fishery with a K49 card in 2012. We fish the permit on our 46' Delta/LeClerq shallow draft pocket seiner called the Sakina. These are a few of the more pertinent reasons for my submission.

Weather- The earlier in February we start there is a more increased chance of adverse weather conditions for vessels moving around heavily laden with pot gear. If we start later in February we will have gained a substantial amount of daylight making for safer working conditions for crew & vessel and a decreased chance of freezing spray.

Economics- We have the option with our vessel to implement hull and P&I insurance in 2 week increments with the split being the middle of the month. If we start the fishery 3 days or more after the 15th it gives those with the same option to omit 2 weeks of commercial use coverage providing a substantial amount of expense for a high risk fishery. I conferred with a local processor and was in strongly in favor of starting later in the month. Crab is usually when most processors dewinterize their plants and bring in personal for taking care of the product. This is fairly costly for them and with a early Feb. start date it makes it difficult to secure a work force with a 3 week lull with little chance of house between crab and the start of the longline/herring fisheries. We are all working on tight profit margins these days.

Opportunity- We in industry feel that every tide set that passes more crab come out of the mud and become available for harvest. If we can get the water temp. to increase, even 1 degree it seems to have the same effect for crab going on "the bite" making for a better CPUE for permit holders.

Meetings- December and January is when industry and the department come together to discuss the past season and look into the crystal ball of the year to come. When the season opens earlier in Feb. and meetings occur as with this year it makes attending a challenge. If I look around until the Jan. 11 end date for operating pot gear and can get back to town before the afternoon jet on the 12th I might be able to give public testimony and would really like to be on the committee as a whole. A later start date might give more of a opportunity for industry to provide input from what we are seeing on the grounds.

I have conferred with local Dept. staff and they've shared some concerns with my proposal. It was not my intent to have separate start dates for the Tanner & Golden King crab fisheries just could only enter 1 ACC. If the season opens to late the Dept. had concerns with the season going into the spring molting and clutching if you were to adopt another proposal extending the exploratory non-core Tanner season. I feel the dept. has the authority with the EO program to stop and restart that part of the fishery to accommodate any concerns they have. The Dept has also stated that they prefer opening the fishery on the smaller tides.

If we were to amend my proposal to be written as follows I think it would cover the issues brought forth by myself and the Dept.

5 AAC 35.110 Fishing season for Registration Area A

(a) Male Tanner crab may be taken only from 12:00 noon on the date with the smallest Juneau tidal range between **February 18 and February 25**, as announced by emergency order, through May 1.

I appreciate your time and consideration on this proposal which I feel would make the fishery safer and more profitable for all.

Thank You,

Joe Willis

Submitted By
Joel Brady-Power
Submitted On
12/20/2021 1:23:16 PM
Affiliation



PC176
1 of 1

My name is Joel Brady-Power. I am a second generation commercial salmon troller and I would like to submit these following comments to the Board of Fish.

Proposal 80: I support the department's intent to establish provisions in regulation to address overages and payback. If one gear group goes over its allocation they should be the one to forfeit fish the following year. These fish should NOT be taken out of the all gear group quota or any other gear group that stayed within their allocation. At the same time the department should be given flexibility to allow one gear group to go over their allocation if and when needed to ensure that we are able to harvest the all gear quota and not leave fish on the table.

Proposal 82: I would like to support proposal 82 with the amendments from the Sitka AC. I would encourage the department to take full advantage of in-season management tools to keep the mostly non-resident guided sport fishery and emerging bare boat charters to stay within the sport allocation without taking fish away from the resident sport fisherman and mostly resident commercial troll fleet.

Proposal 83: I am opposed to proposal 83 for a number of reasons. During the last treaty negotiation process all of Alaska's gear groups lost fish. Coming out of this process we all knew our bottom line was going to be affected, but why should one gear group, in this case the recreational sector, get special treatment at the cost of the commercial sector? The simple answer is that they should not. The charter industry in southeast Alaska is growing without any limited entry to curtail its exponential growth like that which has been in place for the troll industry since its inception. This growth is largely due to lodges and charter boats that cater to tourists coming in from out of state. Without any limits in place prop 83 will result in an open ended reallocation of king salmon from the mostly resident commercial troll fishery to the mostly non-resident sports industry driven by charter boats and lodges. These are trying times for us all, between the losses we all sustained during the last treaty negotiations and the ongoing struggles in southeast's own rivers and the further restrictions we are all likely to be facing as a result of these stocks of concern. The trollers are not seeking additional fish to make up for these losses at the expense of another sector. In fact trollers have helped pay for the production of king salmon at the regional hatchery associations with the 3% enhancement tax on all of the fish sold from our fleet. The charter fleet and lodges have for years benefitted and caught more fish as a result of this production and yet have not contributed anything to help support these local hatcheries. We are all looking at hard times right now and for the recreational sector to try and mitigate their losses by taking fish from another sector is unjust and wrong. I strongly urge you to oppose proposal 83 and it's clear intention to reallocate king salmon from the largely resident commercial troll fishery to the largely non-resident recreational sector. I would instead steer you towards proposals 80 and 82 put forth by the Alaska Department of Fish and Game as better alternatives to bring the sport fishery into alignment with the updated framework of the SEAK all-gear catch limit and resulting sport allocation.

Proposal 101: I oppose this proposal. Many of the concerns in this proposal are unfounded and not supported by any kind of statistical analysis. Furthermore the chum fisheries that have resulted from these highly effective hatcheries have been hugely successful for many gear groups and the organizations that run the hatcheries themselves.

Proposal 103: I oppose this proposal for many of the same reasons that I oppose Proposal 101 listed above.

Submitted By
Joel Steenstra
Submitted On
12/21/2021 8:38:45 AM
Affiliation



PC177
1 of 2

Comments from Joel Steenstra. Representing myself. I own a two boat charter fishing business that provides lodge style services with the exception of dinners for our clients in Craig, Alaska. We are year round residents of Craig. Our business model is the traditional three day fishing packages with 95% non-resident customers.

My business:

- Collects 5% sales tax for the City of Craig
- Has 8 non-residents eating out nightly at local restaurants and shopping in local stores
- Has approximately 160 non-residents flying on Island Air Express, a local airline on Prince of Wales.

We generate a lot of economic activity on the local level.

Prop 82

I am opposed to prop 82 as written as there will be severe negative impacts on my business and the lodge charter fleet in 2C in low abundance years. 1 or 2 kings annually in June is not sufficient to sustain the lodge fleet when business models have traditionally been 3 day fishing packages. We normally don't see catchable coho numbers by rod and reel until July 15th. By prematurely reducing limits of kings before cohos show up, demand for SE Lodge charters will drop off dramatically which will lead to a reallocation of the kings that were traditionally caught by the lodge fleet. Lodge clientele will not come up to fish for one or two kings in June given our halibut limits and a yellow eye closure.

The following is the **minimum** king salmon limits for charter anglers needed to sustain my charter fishing business:

June: 3 annual
July 1-15: 2 annual
July 15-31: 1 annual
Aug/Sept: Closed

Prop 83

I am in support of proposal 83 with the exception of leaving kings open in August when the sport fleet is expected to go over its 20% allocation. In lower abundance years, king salmon should be closed in August if the sport fleet is going to exceed their 20% allocation. Resident anglers have also had ample opportunity to fish for king salmon by Aug 1st. If kings are kept open in August beyond the 20% allocation, it would make it difficult for managers to predict the amount of kings that will be harvested and could cause an overage that would have to be paid back the following year. With an August sport closure, the managers will be able to get a good count and then open the trollers to catch what they have remaining to catch.

If the sport fleet is going to exceed 20%, the **minimum** needed to sustain my charter business is:

June: 3 annual
July 1-15: 2 annual
July 15-31: 1 annual
Aug/Sept: Closed

Proposals 84, 85, 86

Prioritizing resident anglers over non-resident anglers would lead to a reallocation of king salmon that have been traditionally caught by the

charter fleet to unguided resident anglers. SE charters have made significant investments in boats, lodging, and gear at risk if king salmon were allocated away from them.



If resident anglers were prioritized over charter anglers, there is no guarantee that resident effort would not increase fleet. There are no mechanisms in place to keep resident effort at present levels. This puts the charter fleet at risk as any uptick in resident effort will take away from the charters. The amount of ocean capable vessels now, compared to even 10 years ago owned and operated by Alaskan residents, has grown considerably. Not to mention advanced technology has also enabled many resident sportfishermen to be as efficient as charter vessels in catching fish. Spots that have been traditionally fished by charter boats on the open ocean now have a lot of competition from a good sized fleet of resident boats. Despite being a high dollar industry, the SE charter fleet has no fixed king salmon allocation of its own that is separate from resident and unguided non-residents.

Submitted By
John Elliott
Submitted On
10/4/2021 9:11:09 PM
Affiliation



PC178
1 of 1

Phone
9075002289
Email
johnny.m.elliott@gmail.com
Address
514 Monastery St
Sitka, Alaska 99835

Dear Board of Fisheries,

Historically speaking, we are running out of herring in Southeast Alaska. The massive abundance of previous generations is behind us. Herring are critically important to the health of the overall ecosystem and as such we should manage them with a philosophy of reverence and abundance. This is how Lingít people have managed herring for thousands of years and it worked for them. Since the settler State of Alaska took over managing herring, all other Southeast Alaskan populations have been overfished other than what's left in Sitka. As such, I believe we should take a pause on managing herring harvests in the way we have and manage them instead with a philosophy of reverence and abundance.

Please place a moratorium on commercial herring fishing for the next 3-5 years and allow our ecosystems to flourish once again before we return to considering whether the commercial value is worth the cost to the ecosystem and the indigenous people of Sheet'ká.

Sincerely,

Johnny Elliott



Hello,

I'm John Murray of the F/V Sea Bear, homeport Sitka, AK. I've worked most of my adult life as a boat owner/operator. I've trolled for the most part but also have longlined for halibut and been a crewmember on different boats. I've resided in Sitka since 1978. I've had the troll seat on the Sitka F&G Advisory Committee for about 20 years.

John Murray
224 Observatory St.
Sitka, AK 99835
907-738-6212

Proposal 80 Comments:

- Each gear group should be assigned payback overages next season.
- While this might be a burden for managers, it creates what I call equity. A move towards a working environment of responsibility and restraint for managers and the differing fisheries.
 - Fish tickets, port sampling, electric log book entry, creel census, all work toward the goal of not going over your allocation. I believe more work is needed on the sport fishing side for data gathering.
- What I'm concerned about as a troller is the troll allocation becoming the bank, with no recourse for repaying because the overage comes out of next year's allocation.

Proposal 81 - Support with amended language:

(6) As soon as possible in August, if the department determines that any of the above fisheries will not catch their entire allocation of treaty Chinook for the year, the troll and sport fishery will be opened to harvest those excess Chinook.



Reason to support:

- This seems like the proper, legal, and traditional way of sharing in an allocated fishery.
- The key is to make the Kings available as soon as possible in August.

Proposal 82 - Support:

In general I support this proposal with an added recognition of resident anglers, in the Finding number 93-04-FB SEAK. I see this Plan as a work in progress in response to Proposal 176 and BOF actions January, 2019 at the AKY meeting. It very well might come up again for future work as SOC and catch patterns present themselves in the future.

Reason to support:

- The Proposal prioritizes resident sport anglers to some degree but needs to be further spelled out.
- Per staff comments: "The department seeks the boards clarification on the use of inseason management to annually achieve the sport allocation under all management tiers, without modification of (b)(1) conflicting guidance remains on whether the department should manage the sport fishery to attain an average harvest of 20% of the annual harvest ceiling across the years or annually manage to harvest 20% of the annual harvest ceiling."
 - (1) I support the option of "annually manage to harvest 20% of the annual harvest ceiling."
 - (2) I support the use of inseason management to annually achieve the sport allocation under all management tiers without modification of (b) (1).



This is the only practical way to manage the allocation of Chinook salmon under 5AAC 29.060 Allocation of King Salmon in SE Alaska - Yakutat area. It also protects resident anglers.

- While the other option “to attain an average harvest of 20% of the annual harvest ceiling across years” seemed to work out in the past, I don’t see that as an avenue for current management in light of the up to 7.5% PST King reduction in 2018 and lower to medium abundance tiers. For example, 2018 (g), 2019 (g), 2020 (f), 2021 (f) without high abundance tiers (d), (e).

Proposal 83 - Oppose:

As a full time troller, I see this Proposal as a way to get into the troller’s allocation of King salmon. The Proposal doesn’t recognize the long-standing reality that stocks go up and down. Trollers know what to “tighten their belts” means because we’ve dealt with weak Coho runs and/or low abundance of King salmon over the years. It’s part of the way the game is played. SEAGO/Charters need to play by the same rules. They should not be prioritized over the mostly-resident troll fleet.

Reasons for opposition:

- Resident trollers make up 81% of the ownership of troll permits.
- Per Proposal 83’s last paragraph and last sentence, “This Proposal seeks to return troll/sport management to earlier mechanics and clearly define it in regulations.”



- (1) The distinct fallacy of that language is that it looks back to earlier mechanics. The current management regime since the 2018 PST King salmon reduction doesn't bode well for looking forward.
- (2) Since 2018 we have been in a low/medium abundance scenario: 2018 (g) 2019 (g), 2020 (f), 2021 (f). This is what I call the current mechanics, or the reality of the King salmon fishery in SE Alaska.
 - The "bank" and the payback and the loan: First, trollers are not the "bank." Second, what bank would say it's good business practice to loan (King salmon) with an unknown date of payback on the loan. That's what Proposal 83 wants to do.
 - "Be a victim of your own success." That is how I look at the charter fleet. Around 2008 the charter fleet (lodges) asked ADF&G to increase bag and annual limits in May so they could develop markets. This was granted with an annual harvest limit of 3 fish, January 1st to June 30th. It's back to those pesky "earlier mechanics" again. There were some good seasons but since then the all gear Chinook catch was reduced by 15% in 2008 PST and 2018 PST reduction of up to 7.5% King salmon. More fish in May means less fish or no fish in the late season now. It was a choice then and it's a choice now.

Proposal 89 - Oppose

I find this Proposal has a number of pitfalls:

- It is a divisive Proposal amongst the troll fleet.
- I believe it will lead to added incidental encounters/mortality issues during non-retention periods with King salmon. With potential for problems at the PST level.



- I see issues with 5AAC 29.110 Management of Coho Salmon Troll Fishery: (b, 1) & (b, 2) and 2 A & B.
- It also conflicts with 5 AAC 29.065 Allocation of Coho Salmon. Trollers are currently over our allocation percentages by 4%.

Proposal 90 - Support

While this Proposal faces an uphill battle I believe it has merit and makes practical sense. The BOF should approve this as a way to bring it to the light of day at the PSC level.

Reasons for support:

- Since SOC management started in 2018 the spring hatchery access fisheries and the winter King fishery have been greatly curtailed. This Proposal seeks to get a little back in the remaining spring hatchery access fisheries, which are just three in number.

Proposal 91 - Oppose

This Proposal seeks to change the management of 5 AAC 29.100, which is working and has been working since 1994.

Reasons for opposition:

- Divisive issue within the troll fleet. An example of this is Sitka-based trollers (the largest number of trollers in the SE) would generally be opposed to changing to 70/30 under 5 AAC 29.100.



- It really comes down to a choice or preference on whether you'll fish Kings or Cohos during the 2nd King Opening.
- I personally like the 2nd Opener as it gives another chance for a good catch if you missed them on the 1st Opening.

Proposal 115 - Support

This Proposal will add a few more days when week 41 starts earlier in October than the current start date of October 11th.

Reasons for Support:

- The troll fleet has given up most of our spring access hatchery fisheries and up to the last 6 weeks of the late winter King salmon fishery over conservation issues of SOC. It was a big hit for the troll fleet. This Proposal would add somewhere between 4 and 9 days to the early winter King salmon opening date which should help the troll fleet.

Proposal 144 - Support

This Proposal seeks to bring to the board's attention that work needs to be done with rental vessels/bare boat vessels.

Reasons for Support:

- Currently creel census and statewide harvest surveys are the only way to get catch records by these users. I believe we have to take it to the next level: electronic logbooks. So ADF&G can have more accurate and timely reporting.



- There is currently no data on the number of rental vessels by ADF&G.

Proposal 277 - Support

Aligning bag limits from rental vessels with guided anglers makes sense.

Reasons for Support:

- Rental vessels are an ever-increasing niche in SE Alaska. They can and will, over time, add to local depletion of some species, such as halibut.
- This Proposal as well as its companion, Proposal 144, seek to gather data in a timely manner to avoid local depletion of some species.

Submitted By
John Neary
Submitted On
12/16/2021 5:12:01 PM
Affiliation



PC180
1 of 1

I'm very concerned about the ongoing commercial herring fishery in Sitka Sound and do not believe it is being properly managed. Herring stocks have suffered greatly in the last 50-60 years; for example the Lynn Canal stock is virtually gone. The Sitka stock needs to be managed more conservatively with subsistence users as a priority. I support herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166. Whether or not you believe commercial fishing is to blame (and I don't think it is entirely to blame because the factors are complex) it's time to manage the stock differently.



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

I live in Sitka, Alaska, and I participate in the subsistence, commercial, and sport salmon fisheries of the Southeast region. I have been a full time commercial fisherman in the waters of SE AK. I remember voting to fund the current hatchery program with a portion of my catch. Starting in about the mid 1980s, I noticed a change happening, more fish! I was working as a troller then, and the increase in coho numbers was dramatic. Some twenty-five years later I began to participate in the SE drift gillnet fishery. This fishery subsists mostly on hatchery raised and ocean raised chum salmon. So, to summarize, I personally have benefited from the SEAK hatchery program for some 35 years, and can't imagine making a living fishing without the hatcheries. Some years salmon make up the majority of my income.

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,

John Skeele
johnskeele@yahoo.com
(907) 738-9979



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 Skagway, Alaska, and I participate in the subsistence and sport salmon fisheries of the Southeast region. I am a past member of over ten years of Upper Lynnn Canal Advisory board. Salmon is an important food source.

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.

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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.

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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,

John Tronrud
johntronrud@gmail.com
(907) 973-2993

Submitted By
Jonathan Emmons
Submitted On
12/23/2021 8:30:32 AM
Affiliation



PC183
1 of 1

Phone
253 230 5437
Email
Jonnyemmons@gmail.com
Address
P.O. Box 6492
Sitka , Alaska 99835

Hello, thank you for taking my comment. I SUPPORT Proposals 156, 157 and 158.
I OPPOSE Proposals 159, 160, 161, 163, 164 and 165. Please, I encourage your to consider doing the same. Simply look at our past attempts, and how those attempts have come up short, and how it's not working to protect the herring. It's your job, as the board of fish, to create Stewardship of our most precious resources. Please protect the herring and the future of fisheries in Alaska.

Submitted By
Joseph J Daniels
Submitted On
12/17/2021 8:53:46 AM
Affiliation



PC184
1 of 3

Phone
5037046466
Email
josephjamesdaniels@gmail.com
Address
507 Katlian St.
Sitka, Alaska 99835

I, Joe Daniels, SE Alaska power-troll permit holder strongly oppose proposition 83. Individual gear groups should be accountable for holding to their own allocations.

Submitted By
Joseph J Daniels
Submitted On
12/17/2021 8:54:49 AM
Affiliation



PC184
2 of 3

Phone
5037046466
Email
josephjamesdaniels@gmail.com
Address
507 Katlian St.
Sitka, Alaska 99835

I, Joe Daniels, a SE Alaska power-troll permit holder, SUPPORT Proposition 80. Individual gear groups should be accountable for their own overages.

Submitted By
Joseph J Daniels
Submitted On
12/17/2021 8:56:38 AM
Affiliation



PC184
3 of 3

Phone
5037046466
Email
josephjamesdaniels@gmail.com
Address
507 Katlian St.
Sitka, Alaska 99835

I, Joe Daniels, SE Alaska power-troll permit holder, SUPPORT Proposition 89. Put the idle permits to use, create opportunity and value for new entrants to the fleet as well as current permit holders.



December 22, 2021

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

Dear Members of the Board of Fisheries,

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

I live in Juneau, Alaska, and I participate in the commercial and sport salmon fisheries of the Southeast region. I have lived in Alaska my entire life. I own and operate a commercial salmon troller in SE Alaska. I also am owner of a wholesale and retail business that sells Alaska Wild salmon in the US Midwest. I have made my living salmon fishing for 42 years in SE Alaska. I have been operating a seafood wholesale and retail business for 5 years.

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.



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,

Joseph Emerson
sonofemer@hotmail.com
(907) 723-2710

Submitted By
Joseph Emerson
Submitted On
12/22/2021 7:12:00 PM
Affiliation



PC185
3 of 3

Dear Board of Fish Members,

My name is Joseph Emerson. I have been a Alaska resident since 1964. I operate a commercial salmon troller and am also co owner of a seafood wholesale and retail business. The product I catch and sell is sold primarily in Midwestern states of the US. I am opposed to any reallocation of King salmon away from the commercial troll fleet to alleviate reduced bag limits or other restrictions in the commercial guided sport fishing industry. Since I have been fishing I have observed a continual decline of the commercial trollers harvest opportunity due to declining Treaty King Salmon quotas and the unrestricted growth in the guided sport fishery. I believe when the State of Alaska agrees to accept a negotiated treaty Chinook Quota, no group of stakeholders should be allowed relief from the negative monetary impacts at the expense of another stakeholder group. The guided sport fishery still doesn't have a limited entry system in place and the number of participants continues to grow at a unsustainable pace. This unchecked growth continues to erode the commercial salmon trollers harvest and is not fair to those trollers who have purchased limited entry permits. I therefore support and oppose the following B of F proposals.

Proposal 83 Oppose
85 Support
86 Support
92 Support
93 Support
94 Support

Thank You for the opportunity to comment on these proposals.

Sincerely Joseph Emerson

Submitted By
Joseph Hillaire Jr
Submitted On
12/22/2021 11:45:59 PM
Affiliation
Tlingit & Haida Youth Commission



PC186
1 of 1

Phone
907-401-0918
Email
josephh679@gmail.com
Address
PO Box 36
Hydaburg, Alaska 99922

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

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

Proposal 156 should be supported because fishing pressure on herring has never been higher than it is right now and the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance.

Proposal 157 and 158 should be supported because of the growing consensus of the vast importance of older fish for population resilience. The Sitka Sound Sac Roe herring fishery is designed to select for older herring and the population age structure is precarious and vulnerable as a result. These proposals would avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population.

Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.

Proposal 159, 160, and 161 are offensive, baseless, bad faith proposals brought by an industry gear group (called "Southeast Herring Conservation Alliance") against indigenous people. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

I am opposed to Proposal 163 and 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed out fish in the water while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they purport to address.

I am opposed to both Proposal 165 and Proposal 166, which should not even be considered, given that they represent permit creep of a sort that has no precedent and has been discouraged by the CFEC in recent years. I am opposed to both of these measures to expand the scope of the G01A (Herring Roe, Purse Seine, Southeast) permits.

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

During the past decade I have been reconnecting to my roots in Hydaburg, AK; I have been gifted herring eggs plenty of times. I wish to see the same for the following generations to come for my community and other Native communities across the state of Alaska.

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

Submitted By
Juan Belcher
Submitted On
12/22/2021 11:18:26 PM
Affiliation



PC187
1 of 1

Phone
907-738-5826
Email
fishslayer40@gmail.com
Address
PO Box 1505
Sitka, Alaska 99835

December 22, 2021

Proposal 82 and Proposal 83 - King Salmon Management Plan

To the Alaska Board of Fish:

I SUPPORT Proposal 83. And I am NOT in support of Proposal 82.

The 2020 summer season resulted in a 50% to 70% reduction in revenue for most charter businesses. Many did not survive. My name is Juan Belcher and I have been fishing in both the sportfishing charter and commercial fisheries in Sitka, Alaska since 1996. This might not seem like many years by some fishermen's standards, but I feel I have been around long enough to see the changes when charter captain and crew could keep two kings per day, and other species too. And now no longer allowed to keep any Kings, Halibut, Lingcod, etc. while working the sportfishing trips. We now must choose making money in our limited season; OR go personal fishing to access a king salmon.

It seems like every year there are more nails in the coffin. Our boats are sized, and power based on the Southeast Alaska six-line limit. We, in the sportfishing industry do not all own IFQs or do multi-fisheries to balance out changes in market price or fluctuation of abundance in fisheries. We are like a casino! We don't promise 50 lb. king salmon or 300 lb. halibut. This is what we do: We provide a dream and a hope that there is a chance. If only one in a million, but still a chance to catch your dream fish.

If proposal 82 is adopted, the dream and opportunity for any king salmon would be taken away from every independent traveler who comes to SE Alaska to catch a King Salmon. It's like paying for airfare to Hawaii full price and then having the plane turn around half-way there.

Proposal 83 is much more logical to not give the anglers too much in years of high abundance and then not take it away in years of low abundance. It is better to work together with trollers to give them access to our underages in years of high abundance; To make up our overages in years of low abundance.

I think proposal 83 put forth by SEAGO best addresses allowing continued king salmon access to residents, while not reducing their access, allowing trollers to harvest the underages from the charter sector, plus creating a floating mechanism to give stability to the charter sector, which brings outside dollars into local economies! The charter industry is an important component of Southeast Alaska's economic engine, attracting many visitors that support airlines, hotels, restaurants, bars, shops, custom processing facilities, also buying commercially caught seafood to fill up their boxes, bring in lots of sales, bed, and fish box tax from the lower 48, which helps reduce the need for a state tax, higher city sales taxes & property taxes. It keeps money in the city's general fund, which benefits all citizens and user groups in each local coastal community. Does that not have a value to try and protect the stability of this industry?

According to ADF&G saltwater logbook data from 2006 to 2020 there are now 217 fewer active saltwater charter businesses. ADF&G reports on the southeast king salmon sport fishery shows between the years 1999 to 2018 that the all year's floating average catch has been 20.7% sport and 82.2% troll. That is managing very well within the goals for conservation. The federal government could only dream of achieving their goals this close.

Other thoughts: Too much was given up in the salmon treaty, and we have no idea yet, what amount of positive impact to the king salmon resource might develop from a 25% reduction of bycatch by the trawl fleet.

Please adopt Proposal 83 as a better option over Proposal 82.

Thank you for your time and the opportunity to comment.

Sincerely,

Juan Belcher

Submitted By
Juan Cediell
Submitted On
11/16/2021 6:30:01 PM
Affiliation

Phone
5612256283
Email
jcediel4@gmail.com
Address
607 Sawmill Creek Rd
Sitka, Alaska 99835

I support STA



PC188
1 of 1

Submitted By
Julia
Submitted On
11/24/2021 6:37:42 AM
Affiliation
Suquamish

Phone
3606897448

Email
Juliahommel@gmail.com

Address
6751 NE Center St
Suquamish , Washington 98392



PC189
1 of 1

I am a Suquamish tribal member and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast . I support proposals 156, 157, 158.



Julianne Curry
PO Box 8985
Kodiak, AK 99615
Cell- 928.380.3250
sockeye22@hotmail.com

December 22, 2021

Alaska Board of Fisheries
Public Comments
Via email: dfg.bof.comments@alaska.gov

RE: 2022 SOUTHEAST FINFISH, BOARD OF FISHERIES HERRING PROPOSALS

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

Thank you for the opportunity to comment on proposals during the 2022 Southeast cycle. I am providing comments on the following herring proposals:

Support for proposals 159, 160, 163, 164

Opposition to proposals 156, 157, 158, 167

Comments for consideration 161, 165, 166, 233

I am both a fourth-generation commercial fisherman and a fourth-generation Alaska resident, and I began fishing at the age of 14. I'm currently a second generation permit holder in the G01A Southeast herring sac roe fishery, and I participate in other fisheries in the region. I started participating as a crewmember in the Sitka sac roe herring fishery in 2006, and 2016 was my first year as a permit holder in that fishery. I'm a personal use and subsistence harvester, just like many other commercial harvesters in Alaska. I've been an active participant in the Board of Fisheries process for over 15 years as an advocate for science-based fisheries management, sustainable fisheries, and healthy coastal communities. Coastal Alaska is deeply dependent on a successful seafood industry, as well as personal use and subsistence opportunity.

As a herring sac roe permit holder, my fishing income is fully reliant on the ability of the Alaska Department of Fish and Game (ADF&G) to manage harvest opportunity based on sustainability and available biomass. Sitka herring is one of the most studied fisheries managed by the State of Alaska. It's imperative that ADF&G is given the management flexibility to effectively conduct a sustainable fishery to ensure that users have adequate access to the resource, but more importantly, that the resource continues to be available for future generations.

Permit holders, crewmembers, tendermen, processors, and pilots come from all over the state to participate in the Sitka herring fishery. The economics of this pulse fishery reverberate throughout Sitka, the region, and Alaska. **Given the unpredictability of herring spawn timing, location, and the short duration of open fishing periods, the fleet needs as much stability as the BOF can provide.** Past BOF decisions have significantly impacted commercial harvest area and opportunity in an attempt to appease the anti-commercial advocates who participate in the Southeast BOF meetings.

It's imperative that ADF&G is recognized for their successful and data-heavy management of the Sitka herring stocks. ADF&G has worked tirelessly for decades to continuously improve their



management strategy and incorporate the most up-to-date information all while responding to the constant criticism and questioning of the stock composition model and biomass estimates- despite the robust ADF&G process for reviewing herring methodology (which has included a peer review process). As usual, proposals in front of you at this meeting are attempts by armchair scientists to curtail commercial harvest- not to protect herring stocks as claimed. At each Southeast BOF cycle, similar proposals are submitted to unnecessarily restrict management ability and commercial harvest. ADF&G has a strong history of managing the Sitka herring fishery for the natural fluctuations that occur with all fisheries resources. As such, there is enough herring for all users in Sitka. It's important to acknowledge that although the need for subsistence herring has remained relatively stable, participation in the subsistence fishery has declined resulting in tension amongst users that are not related to commercial harvest of the resource.

PROPOSAL COMMENTS:

Proposal 156: Modify harvest rate control rule for Sitka Sound sac roe herring fishery.

OPPOSE. ADF&G has decades of experience and a proven track record for sustainably managing herring in Alaska. Alaska, Sitka in particular, is the gold standard on the West Coast for herring management. Please allow ADF&G to continue to manage our successful fisheries without interference from anti-commercial advocates. As with all species of fish and shellfish, there are natural ups and downs in herring biomass. This is part of the cyclical nature of natural renewable resources and is not typically a sign of species collapse. There are enough herring for everyone without continually trying to undermine the reputation of our management- both ADF&G and the BOF.

Proposal 157: modify harvest rate for Sitka Sound commercial sac roe herring fishery based on forecasted age structure. **OPPOSE.** See comments from Proposal 156.

Proposal 158: Incorporate forecasted age structure into Sitka Sound commercial sac roe herring fishery spawning biomass threshold. **OPPOSE.** See comments from Proposal 156.

Proposal 159: Repeal this regulation related to management of the commercial sac roe herring fishery in Sitka Sound. **SUPPORT.** ADF&G has the management tools necessary without this regulation to properly manage both commercial and subsistence harvest of herring resources. The implementation of this regulation by a past board has resulted in a costly and lengthy legal battle. Repealing this regulation would ease the state's legal burden while maintaining a subsistence priority and subsistence considerations.

Proposal 160: Reduce closed waters in the Sitka Sound commercial sac roe herring fishery. **SUPPORT.** The 2018 expansion of the core subsistence area boundaries was made with little to no data considered to justify the expansion. Please do not support efforts to keep unnecessary areas closed to commercial harvest based on appearance rather than data. It's also important to note that having an area closed to herring fishing will not force herring to spawn in that area or guaranteeing herring will spawn in that area. ADF&G has decades of information on herring spawn area and deposition that indicates herring will spawn where they want, not where we want them to.

Rationale for the expansion was centered around needing to "give something" to the anti-commercial advocates without providing a tangible benefit or any guarantee of subsistence opportunity. The exponential expansion of the closed commercial area came as a great surprise



to those who depend on commercial harvest given the significant increase in closed waters with little to no justification or discussion on the impacts of the expanded closed area. I urge this board to approach this proposal with additional care and consideration this cycle.

Proposal 161: Require a subsistence fishing permit to harvest herring roe on branches in the Sitka Sound area. **COMMENTS.** As an Alaskan who is dependent on science-based fisheries management to support my business and the ability of future generations to harvest Alaska's abundant resources, I'm supportive of efforts to gather verifiable harvest data to improve management decisions and ensure the continued viability of fisheries resources. However, efforts to improve harvest data have been met with such fierce opposition that it creates unnecessary conflict between users that detracts from other important decisions the BOF needs to make. Commercial herring harvesters are accustomed to accurate and timely reporting, and it seems appropriate to now work towards better accounting for other users.

Proposals 163 and 164: Establish equal share quotas for the Sitka sac roe purse seine fishery. **SUPPORT.** Establishing an equal share fishery for Sitka sac roe would be the single greatest conflict resolution action the BOF could take. The Sitka herring fishery is driven by roe quality and time prior to spawning. This results in an ultra-competitive fishery as 47 boats fight for the same fish in an area that gets smaller each Board of Fisheries cycle. The competitive nature of the fishery creates a dangerous race for fish where vessels try to out-maneuver one another to find large schools of herring with high quality roe.

Past cooperative style herring fisheries have resulted in less vessel damage and injuries, reduced enforcement needs, higher quality roe, and easier management decisions. Establishing an equal split fishery would allow processors to operate at maximum efficiency by feeding a steady and predictable stream of product through plants. By creating more stability with an equal split fishery, ADF&G management would have the ability to become more precise without the stress of ensuring that the right amount of fish is harvested each brief opening.

An equal split fishery would also reduce conflicts between user groups by having the fleet reduce their footprint and impact in the Sitka area. Less racing for fish can result in more cooperative herring which can increase opportunity for commercial harvesters as well as subsistence users.

Proposal 165: Allow G01A permit holders to harvest unharvested Sitka sac roe GHL for food and bait. **COMMENTS.** I will reserve my position on this proposal until I have a better understanding of the issue at the meeting and can gage any unforeseen issues. However, I'm generally supportive of efforts to shift product forms within a fishery as long as the current fishery isn't disproportionately or negatively impacted.

Proposal 166: Create an open pound herring spawn on kelp fishery in Sitka Sound. **COMMENTS.** I will reserve my position on this proposal until I have a better understanding of the issue at the meeting and can gage any unforeseen issues. However, at first glance this proposal appears to have jurisdictional issues that may make it unappealing.

Proposal 167: Redefine the boundaries of the Hoonah Sound spawn-on-kelp fishery (13-C) and the Sitka sac roe fishery (13-A/B). **OPPOSE.** This proposal really just doesn't seem necessary and may result in an unnecessary disruption of the established Sitka sac roe fishery.



Proposal 233: Remove districts 13-A and 13-B from Northern Southeast herring spawn on kelp pound fishery administrative area. COMMENTS. This proposal seeks to remove Sections 13-A and 13-B from the Commercial Fisheries Entry Commission (CFEC) administrative areas for the northern spawn on kelp fishery (L21A). Many permit holders in both fisheries have been consistently frustrated by the confusion and lack of action on this issue. There seems to be either a lack of clarity or lack of will to resolve this overlap. Hopefully the current BOF is willing to do a deeper dive and help resolve this issue to save us all the time and energy during future board cycles.

Thank you for your time and your attention to the fisheries of Alaska. Your effort and dedication to the BOF process is greatly appreciated, especially as we approach the long Southeast cycle. Please feel free to reach out if you need any clarity or have questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Julianne Curry".

Julianne Curry

Submitted By
Justin moody
Submitted On
12/19/2021 11:10:52 AM
Affiliation



PC191
1 of 1

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

Thanks you.



Justin Peeler

F/V Defiant
4120 Halibut Point Road
Sitka, Alaska 99835
(907) 340-6106
justinpeeler79@gmail.com

December 22, 2021

Marit Carlson-Van-Dort, Chair
Alaska Board of Fisheries
PO Box 115826
Juneau, AK 99811-5526

RE: Comments for SE Finfish and Shellfish Meeting Jan 2022

Dear Madam Chair and Board of Fisheries Members,

As a second generation Fishermen from Petersburg Alaska I have been involved in the salmon, herring, and crab fisheries in Southeast Alaska all my life. As well as many other net, pot, and hook fisheries on the West Coast and Gulf of Alaska. I currently own and operate the F/V Defiant out of Sitka, Alaska.

I currently serve my gear group(seine) as a officer on the board of directors for Southeast Alaska Seiners Association(SEAS). I am also a seine representative on the board of directors for Northern Southeast Regional Aquaculture Association(NSRAA) of which I currently serve as president and serve on the southeast regional planning team. Also serve as a member of the board for Southeast Herring Conservation Alliance. I will be available at the meetings to answer or discuss any topics. I am writing to you on behalf of myself and my comments below are my opinion.

Herring:

Proposals 156,157,158- Oppose

These proposals look to change the management of the herring stock in the Sitka Sound area. I strongly oppose this as there is no biological reason to change the management of this herring stock. These proposals and the group that wrote them intends to change the management of the stock until it becomes not viable for the commercial industry to operate.

Proposals 159- Support

This regulations interpretation and application has been a topic in a recent lawsuit. As written it leaves too much for interpretation. That the department is not following it and/or should shut



down the commercial sac roe fishery till after the spawn. This would eliminate the fishery. This was not the intent of this regulation and it deserves to be rewritten or repealed to eliminate this perception.

Proposal 160- Support

I support removing these closed waters and moving the closed area back to the original “core area” for closed waters. I do not think that closing waters to commercial fishing is going to help substance users meet the “Amount Necessary for Subsistence” goal. Which was used and is used to justify all actions taken against the commercial industry. The only way they are going to reach that goal is by more participation. Which according to the Subsistence division report has been on the decline for years. Please do not think that we as commercial users do not want Substance users to get what they need or want. We do; but closing waters to us is not going to get them what they desire.

Proposal 161- Support

This proposal is to require a permit for subsistence users. The intent would be to get sound information and numbers by subsistence users. I believe getting the best information possible to accurately understand the need and use of the subsistence harvest is needed.

Proposal 163 and 164- Oppose

As a GO1A permit holder as written I cannot support these but if equal quota shares would allow for diversification of the commercial product, I could support them.

Proposal 167- Oppose

This area has been a part of the Sitka Sound herring fishery for a long time and is just a area grab by a outside user group.

Salmon:

Proposal 123- Support

As a SO1A permit holder I support our access to Northern Pink Salmon stocks. This proposal does that and protects north bound sockeyes.

As a member and board member of Southeast Alaska Seiners Association I refer you to the on time comments submitted by SEAS on all other Salmon Proposals.

Shellfish:

Proposals 200, 205,207,and 208- oppose

As a D9AA Permit holder I strongly oppose closing waters to the commercial Dungeness fishermen. There is no biological concern in any of these cases and is just a allocative issue. Closing area to any user group always creates more pressure in others.

**Proposal 201- Oppose**

As a Sitka resident and commercial crab fisherman I oppose the expansion of the closed waters around Sitka to commercial fishermen. This proposal was written and submitted with no input from the commercial fishermen of Sitka. Upon hearing from the commercial fishermen, the Sitka AC voted to oppose this proposal.

I would like to thank each one of you for serving the people of the State of Alaska. I will be at the meetings and hope to be able to answer any questions you may have.

Thank You,

Justin Peeler



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 Cordova, Alaska, and I participate in the subsistence, commercial, and sport salmon fisheries of the Southeast region.

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,

Justin Ryan
justinryan0307@gmail.com
(907) 831-0905

Submitted By
Kaitlyn Conway
Submitted On
11/16/2021 6:29:09 PM
Affiliation



PC194
1 of 1

Phone
8172871116
Email
kaitlynconway0123@gmail.com
Address
1341 Glacier Hwy
Juneau, Alaska 99801

I support Sitka Tribe of Alaska proposals 156, 157, & 158. We should listen to the elders and native Alaskans who have been protecting and harvesting herring since time immemorial.

Submitted By
Karina Belcher
Submitted
12/22/2021 10:46:42 PM
Affiliation

Phone
907-738-7553
Email

info@wildstrawberrylodge.com Address
P.O. Box 1505 Sitka, Alaska 99835



PC195
1 of 3

Re: King Salmon Management Proposals 82 & 83 December 22, 2021

To the Board of Fish,

My name is Karina Belcher, and I am a college student who will graduate this May from Boise State University with a degree in Business Administration. I was born and raised in Sitka my entire life and can think of no other place I would like to live after graduating than Sitka. This is not something that most Sitkan or Alaskan graduates say. Attending school out of state is not cheap and I have been able to afford this solely through academic scholarships and working my tail off during the summers and part-time during the winters at a resident owned and operated local fishing lodge here in Sitka that has been in business for over 30 years. I started working there in high school and have been ever since with the goal of learning about the industry, gaining valuable life and work skills, and contributing my part towards showcasing the beauty of Sitka and Alaska to those who have never been here before and creating lifelong lovers of Alaska who travel each year to enjoy a little slice of our rainy, cold paradise and contribute to the local economy with their out-of-state dollars.

Contrary to popular belief, the people who come fishing with us (who I have talked with extensively when setting up their vacations) are not obsessed with catching and taking home massive quantities of fish home with them. The reality is those people who count every pound and do not enjoy the many sights Alaska has to offer, stopped coming to this state a long time ago ever since regulations were severely decreased in the mid 2000s. Those people will not be coming back any time soon. Our current clients are families and friends who are just as excited about a king salmon as they are about a humpback whale breaching and seeing deer on our shorelines.

Alaskan lodges for many years, have been able to offer their clients an unforgettable fishing vacation, emphasis on the fishing. We cannot continue to operate as we have by offering them instead "just the experience and one fish" but hard sell them on "regulations might be x but they might be y." This is a sleazy sales technique used by companies in tourist trap towns with nothing unique or exciting to offer. Alaska is not that way so we should be able to give a reasonable estimate to our guests who are often booking a year in advance of their potential access to the resource during the various months in the summer season. I have read proposal 82 and respectfully believe that should it pass; I would be out of a job along with many of my local Alaskan co-workers. There is a reasonable expectation that a person coming here has when they spend their hard-earned dollars in Alaska. I do not support proposal 82 because it takes away that reasonable expectation, creates huge in-season instability, and destroys one of the few marketable and enjoyable pieces of a May, June, or early July fishing vacation: King Salmon.

As a resident, I want to also keep access to the king salmon for my own use and support resident harvests of king salmon and proposal 83 does a much better job of balancing resident and non-resident access while providing in-season stability and reasonable regulations for those looking to enjoy a slice of fresh Alaskan fish and share it with their family and neighbors.

In my time over the last eight years working in the sport fishing industry, I can recall hundreds of clients who contact us asking where they can purchase locally caught commercial fish for themselves or as a present for others and we steer them towards the many fish processing plants that sell to the public. The fish they catch, or purchase commercially, becomes a great talking point during the holidays when people come together to discuss the highlights of their year, and Alaska is often one of them. By continuing to provide stable regulations and a marketable asset to non-residents, the State of Alaska has a free, organic, and strong marketing campaign that continues to provide and support the local businesses, state economy, and companies who employ thousands of Alaskans every summer.

In my readings of both proposals, I honestly believe that proposal 83 would be a much better alternative to proposal 82 for everyone affected by its stipulations. By all means, should you pass proposal 82 in the name of resource sustainability to residents, **tell me to my face and the rest of us residents, who work in this industry, that a few extra pieces of king salmon in our freezers at the end of the year is worth the following:**

- Losing our jobs
- Missing the out-of-state revenue

- The loss of revenue to the Alaska Department of Fish & Game in the form of fishing licenses and King Salmon stamps
- The loss of local fuel purchases and associated taxes
- The local and regional outboard engine dealers with half the amount of business
- Losing jobs available to high school students and Alaskans during the peak summer months.
- A severe decrease in evening dinner restaurant patronage
- Empty hotels with no other use for their rooms
- Grocery stores and food suppliers losing the money lodges spend on food and meals
- Half the number of flights in and out of the state during the summer
- Alaskan boat builders and welders not being able to keep enough projects going to survive.
- Each individual city losing millions of dollars of sales tax and other local taxes



This is just the tip of the iceberg of how lodges, like the one I work at, contribute vast amounts of commerce to Alaska because of the access to king salmon and other important species. Proposal 82 is not sustainable. Not to the fish, and certainly not to the businesses relying on them. Give it a couple of years with proposal 82 and we will see a dramatic reduction in sport fishing and a resulting negative change to the Alaskan economy. On the surface, it would appear that the whole idea of proposal 82 is to prioritize great regulations and king salmon access to residents throughout the whole summer at the expense of non-resident anglers. **Is axing the sport fishing industry worth this** when the unintentional result would likely be **tax hikes and increased costs of living for residents** that will make subsistence and **resident access to king salmon a luxury reserved only for those who make up the top percentage of income** levels in the state? As currently written, proposal 82 does not appear to solve the problem at hand and would lead to less residents being able to access king salmon because of the increased costs associated with less business activity.

Face the reality of what Alaska will look like should the regulations in proposal 82 become effective because we in the sport industry cannot continue to contribute the same amount to the economy under those conditions outlined. I want to stay in Sitka, and I want to keep the job I have as it combines everything I am skilled and passionate about at the same time. You would be denying Alaskan teachers who guide during the summer a chance to provide for their families beyond the salary they earn teaching the next generations for nine months every year. According to the ADF&G economic impact report from more than a decade ago, the state can kiss 295 million dollars from the state GDP, over 3,000 jobs, and 22 million in state and local taxes goodbye. Even so, these values when adjusted for inflation would be just under 400 million dollars in state GDP and 30 million dollars in state and local taxes. As the office manager of the lodge I work at, I can say that in the 2021 season alone, our clients purchased over \$83,505 dollars of fishing licenses and king salmon stamps. When the average salary of ADF&G personnel is around \$55,000 dollars a year, **can you justify losing a job and a half for each lodge** put out of business by unrealistic regulations? How many important programs and research projects will be cut or suspended because of the lack of revenue brought into one of the largest state organizations aimed at preservation and responsible use of natural resources? We spent more than \$200,000 dollars on outboard engines, parts, and maintenance all from the Sitka dealership this year alone. A substantial portion of the employees (my co-workers) are Alaska residents and young people between 16 and 25 years old, who gain the opportunity to earn money to sustain themselves through the winter, to support their higher education goals, or contribute to their family expenses.

There are only so many Alaskan residents and their patronage alone cannot float the many restaurants Alaskans enjoy. When cruise ship tourists are back on their boat by 4 pm, it's clear to see they are not the groups eating at local restaurants. Sport anglers keep restaurants busy and make up a huge amount of their revenue each evening when they dine out after a day of fishing. Not only do they eat at restaurants, but they also purchase items from local artists, shops, and visit the historical sights that add to the magic of Alaska. When Covid-19 restrictions prevented cruise ships from getting to Alaska, sport fishing travelers still visited the Alaska Raptor Center, the Fortress of the Bears, and took island tours from local guides and companies. This group of travelers (identified as the independent traveler) have the highest value and economic contribution to the state of any other group. Each night they spend in the local hotels and

vacation rentals, is outside money that would not have otherwise been realized by the local taxes and residents who rent their houses. Grocery stores certainly would not want all of the revenue from fishing lodges being wiped off of their books and that would also mean thousands of dollars of commercial caught fish purchased by the lodges to supply to their kitchens wouldn't be sold by the processing plants. We all know that less demand means a lower price to commercial fishermen at the dock (as seen in the summer of 2020 when restaurants and lodges were all shut down in accordance with lockdown restrictions) and many commercial boat owners and families wondered how they would make their boat and house payments when the market prices for salmon and halibut were so low.



Based on conversations with Alaska Airlines and firsthand work at the Sitka Airport, non-resident sport anglers make up two thirds of their demand and in accordance with the normal laws of supply and demand, without those people, there would probably be 2 or 3 flights in and out of Sitka in the summer, similar to the winter, instead of the normal 6 or 7. Every single one of the boats operated at this lodge were built, welded, painted, and outfitted locally and continue to contribute to the economy with each trip they take to the fishing grounds. Given my time spent growing up in Sitka, I think the city administration and Sitkans overall aren't aware of the amount of tax revenue that fishing lodges bring to the town and how much of an impact their reduction in business or total lack of operation would affect the city accounts at the end of the year as well as the increased tax burden each citizen would be facing to make up the difference.

Given your positions on the Board of Fish and your decision-making powers, I don't need to explain to you the components of proposal 82 and 83, but I hope I have helped to shed light on how the adoption of proposal 82 will negatively impact people like myself who just want to continue to work and live in Alaska.

Contrary to what others may testify to, proposal 83 is NOT a mechanism for the sport fishing sector to exponentially increase our allocation of king salmon so the fishing lodges can grow well beyond their means. We are asking for proposal 83 so we can have some semblance of a sustainable fishery for both king salmon and sport fishing businesses. At its core, this proposal can give the sport fishing industry consistency with regards to in-season emergency orders and closures, as the goal is to continue to have a tangible fishing vacation to offer non-residents in May, June, and early July, who appreciate & respect king salmon and Alaska, just as much as resident anglers like myself do. Thank you for your time and consideration of my comments.

Sincerely, Karina Belcher

Sources:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiP-qu_vj0AhX-FzQIHUcsA3YQFnoECBAQAw&url=https%3A%2F%2Fwww.adfg.alaska.gov%2Fstatic%2Fhome%2Flibrary%2Fpdfs%2Fsportfish%2F2007economic_impacts_of_fishing.pdf&usg=AOvVaw2o92ObhhulYh7zeuTBO98T

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<https://www.simplyhired.com/salaries-k-adf%26g-jobs.html>

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:51:26 PM
Affiliation



PC196
1 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 80.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:51:50 PM
Affiliation



PC196
2 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 89.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:53:59 PM
Affiliation



PC196
3 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 144.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:54:36 PM
Affiliation



PC196
4 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I oppose Proposal 101.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:54:54 PM
Affiliation



PC196
5 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 80.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:55:26 PM
Affiliation



PC196
6 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I oppose Proposal 103.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:55:58 PM
Affiliation



PC196
7 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I oppose Proposal 83.

Submitted By
Karl Wolfe
Submitted On
12/21/2021 8:49:32 AM
Affiliation



PC197
1 of 1

As a 30-year Sitka resident, with personal stakes primarily in the subsistence and sport fisheries, as well as previous experience conducting fisheries surveys in the discussed watersheds; both as an employee of ADF&G and as a private fisheries consultant, I would like to strongly oppose both Propositions 101 and 103. I personally view both these proposals as a scattergun approach by outside interests with an ideological agenda blindly firing and seeing what they can hit.

First. The areas where these hatchery operations are conducted were chosen through a process to occur where stock interactions are non-existent or minimal so that they can be to be effectively managed.

Second. As stated previously I have taken part in not only sport and subsistence activities in these areas but have previously conducted surveys in these watersheds. I can attest by many wet skiff rides that local in-season management is extensive, comprehensive, effective, and adaptable.

Do we let outside interests influence management of our fisheries or do we let the experts do it? The first didn't work so well prior to statehood. I hope the Board gives these proposal's the minimal time and attention they deserve.

Submitted By
Karla Hart
Submitted On
12/12/2021 8:11:25 PM
Affiliation



PC198
1 of 1

I stand with the Herring Protectors in:

SUPPORTING proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska.

OPPOSING proposals 159, 160, 161, 163, 164, and 165 submitted by the Sac-Roe industry.

I'm a lifelong Alaskan who has always questioned the Sac-Roe fishery. Lots of drama, lots of money for a few fisherman, and the death of fish that could spawn year after year, enriching our region's people and fish and wildlife. The Herring Protectors vision for stewardship should be guiding the Board of Game decisions.

Submitted By
Katelyn Stiles
Submitted On
12/21/2021 7:58:26 AM
Affiliation



PC199
1 of 1

I am writing to express my support for proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska. These proposals are practical measures to preserve our Herring populations for all parties into the future. From the research I have done and relatives I have spoken with, Herring have been gradually disappearing from Sitka for decades. We must think about future generations, the health of the Pacific ecosystem, and the economies that depend on it. Pacific Herring are a keystone species, which salmon, sea mammals and other marine wildlife depend on, yet I don't think that our current policies reflect Herring's role in our oceans as a forage fish. This significant position that Herring hold in the ecosystem needs to be carefully addressed with care and nuance, in order to stop harvest practices that cause harm to all of us. I strongly agree with a common-sense sustainability approach to managing our fisheries, lands and waters. Proposals 156, 157, and 158, which I support, are very modest proposals, and I believe we must go even farther if we are going to protect Herring populations for the future.

Herring egg harvest has been a vital part of Tlingit culture for thousands of years and continues to be today. Herring are sacred, and our harvest practices have always been about respect and ecological stewardship, ensuring that the community and Herring thrive into the future. We have ancient oral histories that instruct us of our responsibilities to Herring as our relatives. The decline of Herring is intertwined with colonization, climate change, and racist policies that outlawed Tlingit ways of life. I believe that the Board of Fish and the State of Alaska must listen to the voices of its Indigenous Peoples and governments in order to stop the continual violence that these policies have created. As a citizen of Tlingit & Haida and a member of the Kiks.ádi Clan of Sitka, I strongly support proposals 156, 157, and 158.

I strongly oppose proposals 159, 160, 161, 162, 163, 164, and 165. These proposals lack good scientific backing and respect for subsistence harvesters and Tlingit ecological knowledge. Combined, these proposals could be devastating. Your decisions on these proposals will have affects for several generations to come. Thank you for your time reading this and for making a decision with all of us in mind. Gunalchéesh

Submitted By
Kelly R Warren
Submitted On
12/15/2021 8:23:05 PM
Affiliation
Commercial Fisherman / Permit Owner



PC200
1 of 2

I would like to thank you for the opportunity to comment on the proposals that directly affect my family and I along with my crew members that have been with me for so long.

Concerning Proposals #156, #157, #158. I oppose all three of these proposals because they are based on an agenda other than maintaining a renewable resource. As a permit owner for the SE Sitka Herring Sac Roe fishery I have done my due diligence, as have so many others, and it is painfully obvious that the Sitka Sac Roe Fishery has been managed in such a way that not only is it a sustainable fishery but in a way that the biomass of herring has continued to grow in such a way that we are seeing record numbers of herring as well as record setting numbers in miles of spawn as well as spawn deposition. How anyone can continue to claim that the herring stocks are declining is a mystery to me. The science of management and the record numbers of herring each year speak for themselves.

Concerning Proposal #159. I am in favor of this proposal for the reasons stated in the proposal.

Concerning Proposal #160. I am in favor of this Proposal. Living in Sitka over the last 30 years I have had the opportunity to see firsthand how much effort is being put forth by the tribe to artificially increase the amount of herring spawn necessary to meet their needs. As an industry we have gone above and beyond to ensure that there is ample opportunity for harvesting herring roe. However, there is obviously no end to the claims that the traditional harvesting of herring roe cannot be accomplished under the current management plan. The answer as to why there seems to be no end is quite simple to see for anyone who is willing to look at the facts at hand without any bias or special agenda. A longtime friend of mine that was on the tribal board told me flat out that the tribe would not be happy until the herring fishery was closed permanently. I think it's safe to say in light of the facts pertaining to the health of the herring stocks that the continued lawsuits and proposed regulation changes from the tribe are nothing more than efforts to promote their private agenda.

Concerning Proposal #161. I am in favor of this proposal. The commercial industry is continually being scrutinized from every direction as it should be in order to track all of the pertinent information relating to the fishery in order to gather the necessary facts in order to ensure the continued success of the herring stock which in turn ensures the success of the sac roe fishery. Unless the state steps in and requires a permit in order to harvest subsistence herring roe there is absolutely no way to properly document the effort. Can anyone honestly expect a special interest group to provide information that is anything other than beneficial to their cause? History tells us that expecting that is folly at best.

Concerning Proposal #164. I am in favor of this proposal for several reasons. With the continued scrutiny of the Sitka Herring Sac Roe fishery, I believe that it is important to create a fishing environment that promote safer fishing practices for everyone concerned. With an equal quota share fishery there will be no need to conduct a "Shoot Out" type fishery. An equal quota share fishery will ensure that there will be less damage to boats, nets and crew. An equal quota share fishery will allow Fish & Game to prosecute a more closely monitored fishery in terms of catch rates in different areas due to fewer boats fishing. With the market for herring roe being what it is now an equal quota share fishery would allow the permit holders to fish in a way that is more productive financially. In all honesty it's time to do away with the type of fishery that promotes a battle between the permit holders and create a fishery that promotes the safe harvest of a renewable resource.

Concerning Proposal #165. I oppose this proposal. As a permit holder I agree in principal that we should be able to harvest the remaining herring quota for alternative markets once the dedicated sac roe fishery closes. However, the herring fisherman are under constant attack by special interest groups claiming that the herring biomass is suffering at the hands of the state's current management plan. Science and the fact that the herring biomass is larger now than it has ever been does not seem to affect their allegations or their efforts to spread false information to the masses. Allowing permit holders to continue to harvest herring for different markets after the dedicated sac roe fishery would only have a negative impact on the fishery at this time. Perhaps when the special interest groups finally realize that they cannot manipulate the fishery politically and quit spreading so much false information the herring fishery will finally be able to be managed in a way that will allow the permit holders to harvest the available herring for markets other than for the roe only. Until such a time any additional fishing effort is a step in the wrong direction.

Concerning Proposal #166. I oppose this proposal. Trying to prosecute two different fisheries at one time in the same location is asking to much of Fish and Game. It would also no doubt create problems between the two different gear groups that would end up requiring more regulations to be created on issues that are obvious as well as those that cannot be foreseen.

Concerning Proposal #167. I oppose this proposal. It is unfortunate that herring biomass in Hoonah Sound no longer supports a Roe on Kelp fishery. Nature does not always repeat itself the way we would like. Whether we like it or not anytime we gear up for a fishery or purchase a fishing permit we are taking a risk. We try to mitigate that risk as much as possible but it is still a risk. We cannot control the movements of fish or the changes that occur in nature. If we set a precedence to redefine boundary lines every time a fishery does not produce in the way that we had hoped we are opening up the possibilities for redefining boundary lines in every fishery that exists in the state when they don't perform the way we would like.

Concerning Proposal #233. I support this proposal for the reasons stated in the proposal.

Submitted By
Kelly Warren
Submitted On
12/16/2021 10:51:40 AM
Affiliation
Fisherman / Permit Owner



PC200
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Thank you for taking the time to consider my comments of these proposals. I appreciate all of the hard work and effort that goes into what you do as the Board of Fisheries for the entire State of Alaska.

Concerning Proposal #190, I support this proposal. Under the current management plan there have been little to no fishing opportunities. As a Red King Crab permit owner, I feel that this proposal is the best solution to accomplish continued protecting the red king crab stock while at the same time providing at least some fishing opportunity for permit owners. With an equal quota share fishery F&G would be able to predict and manage the harvesting of Red King Crab in a way not previously possible. It will allow F&G to prosecute a fishery without the inherent risk associated with the traditional open Red King Crab fishery. It will also allow fisherman to stack permits so there will be fewer vessels fishing which will also aid F&G keep track of harvest levels in different areas.

Concerning Proposal #191, I support this proposal. With the cuts in state budgeting, it's understandable to consider the possibilities that the finding for the Red King Crab survey may not be renewed. In that event we would like to have an additional management plan in place. This proposal accomplishes this goal while at the same time continuing to ensure the protection of the stock.

Concerning Proposal #192, I am in favor of this proposal. The proposal includes all of the explanations and information that I believe is necessary so I will not add to it.

Concerning Proposal 195, I oppose this proposal. Changing the pot limit for Golden King Crab to mirror the limit for Tanner Crab for the reasons stated in this proposal is not justified. Golden King Crab fishing is entirely different than Tanner Crab fishing and trying to manage it the same way would be a mistake. The rate at which we haul Golden King Crab pots is such that the additional 20 pots make a big difference. Penalizing the fishermen to make things easier for F&G is not sufficient reason for reducing the pot limit. It should not be difficult for F&G to know exactly who is fishing 100 pots and where with the preseason registration coupled with the daily call-in requirements for ALL Golden King Crab fishermen.

Concerning Proposal #197, I support this proposal. I believe that this is a necessary change needed in order for more area to be explored. As stated in the proposal, the combination of weather and the size of the area make it extremely difficult to travel. With the current time restraints, it is not worth the risk to miss crucial fishing time in order to explore other areas. The additional time would allow a fisherman the opportunity to continue to fish productively during the core and non-core fishing window with time left to explore other areas.

Concerning Proposal #199, I support this Proposal. It brings to light a valid point. For many of us the time that we are out fishing the non-core areas are the only time we are in an area to fish for subsistence shrimp and Dungeness crab. It makes no sense to have to make a special trip with the additional expense to travel a second time to the same area in order to subsistence fish for shrimp and Dungeness crab. This proposal also makes a good point in that a sport shrimp pot or Dungeness pot is not going to catch a legal tanner or golden crab.

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



PC201
1 of 1

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

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

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

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

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

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

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

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

Phone
907 766 2138
Email
kentcheetah@gmail.com
Address
po box 874
haines, Alaska 99827



PC202
1 of 3

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



December 22, 2021

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

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

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

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

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



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

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

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

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

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

Sincerely,

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



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

RE: King salmon management proposal 82 and 83

Chair Carlson Van Dort and members of the Board

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

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

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

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



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

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



PC204
1 of 1

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



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2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

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

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

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



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

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

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

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

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



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

Haw'aa,
Respectfully,

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

Gloria Burns



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2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #81 Allocation of King salmon to trollers

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

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



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

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

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

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



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

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

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



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

Haw'aa,
Respectfully,

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

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

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

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

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



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

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

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

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



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

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

Haw'aa,
Respectfully,

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

Gloria Burns



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2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

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

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

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



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

We would like to address the directives in this proposal:

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

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

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

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



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

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

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with king salmon allocation, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,
Respectfully,

Gloria Burns

Gloria Burns



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2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
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Comment for proposal #163 regarding equal share harvesting for the Sitka Sac
Roe Herring fishery

In regards to proposal #163 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its opposition as we do not see this supporting the goal of long term sustainability of Pacific herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to address our concerns as it relates to this proposal. The biggest thing that stands out to us in



regards to this proposal is that it this type of fishery allows for fishers to be selective of what fish they harvest and what type of fish they release back into the water. This is something that is very concerning to the Ketchikan Indian Community. As with any fish, there is an associated mortality rate that comes catch and release activities. Herring are a relatively delicate fish and there is a higher mortality when they are caught using seine nets. We do not believe that this is beneficial to the population during the long term. No fish should ever be wasted if we are attempting to harvest it. The only thing that would make this proposal worth considering is if they would be required to harvest everything that comes into their nets. No exceptions. Additionally, the implementation of vessel observers would make our tribal government more willing to consider this proposal.

As this proposal addresses the need for keeping people and property safe, which the Ketchikan Indian Community Tribal Government also values, there needs to be another solution that meets this requirement. We feel something more can be done to keep people safe while keeping the long term sustainability of this resource together.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. ~~Let this be an invitation to the State of Alaska that the Ketchikan Indian~~ Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

Gloria Burns

Gloria Burns



PC205
17 of 88



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2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #87 regarding King Salmon allocation to nonresident fishers in the southeastern Alaska-Yakutat area

In regards to proposal #87 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeek in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan



Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

This proposal simply states that the state of Alaska has the obligation to protect the rights of residents of Alaska, especially the Indigenous people of Alaska. The people who live here should be never be at risk this year. The Alaska Department of Fish and Game did recognize that in the summer season of 2021 the harvest of nonresident sport fishers was higher than anticipated. Regardless of the timing of it, the Department should always use this as a tactic to assure that residents always have access to these resources.

One aspect of this proposal that is of interest to the Ketchikan Indian Community Tribal Government is the concept of a fish box tax on nonresident sport fishers. We would like for this issue to be addressed in length at the Board of Fish meeting. We feel that this could be useful in a number of different aspects.

1. This could very much help with addressing some budget woes that go on with science and research that the Alaska Department of Fish and Game may have. This would also put less burden on resident Alaskans to support these kinds of research.
2. People who come to harvest in our waters from out of the state are not going to worry about a small tax that will be imposed on them for harvesting their own fish. Again, these people are not coming here to survive off of this resource, they are here for the experience, which cost for most people are an after thought. This means there shouldn't be economic loss to those who have charter fishing businesses.



While it is addressed in a number of proposals in this meeting cycle, the Ketchikan Indian Community Tribal Government would like to provide suggestions to help out with the management of nonresident sport fishers:

1. Reporting catch AND harvest records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

2. Intermittent closures during the week seem to have a positive impact on the management of halibut, we felt that a version of this can be very useful impact on king salmon as well.

This proposal is not to meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people



use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

A handwritten signature in black ink that reads "Gloria Burns".

Gloria Burns

Cc:

ADEFG



Bo Meredith
2030 Sea Level Dr. #205
Ketchikan, AK 99901
Bo.meredith@alaska.gov

Don Young- US House Representative
2314 Rayburn House Office Building
Washington, DC 20515

Lisa Murkowski- US Senator
522 Hart Senate Office Building
Washington, DC 20510

Dan Sullivan
302 Hart Senate Office Building
Washington, DC 20510

Dan Ortiz
State Capitol Building Room 513
Juneau, AK 99801

Representative.Dan.Ortiz@akleg.org



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #161 regarding subsistence fishing permits for herring
roe

The Ketchikan Indian Community is in strong opposition of proposal #161 regarding subsistence fishing permits for harvesting herring roe on branches in the Sitka Sound Area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The proposal written by the Southeast Herring Conservation Alliance, a group of organized commercial sac roe herring fishers, is a direct attack on the rights of Indigenous people of southeast Alaska. This misinformed group does not understand customary and traditional use by rural Alaska natives and wishes to



enforce an unnecessary regulation on the Tribal Citizens of Sitka. In the proposal written by the Southeast Herring Conservation Alliance, they directly site the litigation between the Sitka Tribe of Alaska and the State of Alaska. It is not the fault of the tribal citizens that the population of the herring in Sitka is of low abundance, but it seems that the Southeast Herring Conservation Alliance thinks that way.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.

The Ketchikan Indian Community also values accurate and unbiased scientific data that could help guide the best actions necessary to achieve the goal of sustainable fisheries in Alaska. The Sitka Tribe of Alaska has significant in-house resources when it comes to ocean research in southeast Alaska. The Ketchikan Indian Community would find it more desirable that the Sitka Tribe of Alaska work alongside its tribal citizens to acquire accurate data for the use of management purposes of herring in that area. Instead of directly attacking user groups, especially those who rely on these resources to sustain their healthy dietary needs, we should be working together to reach our common goal of sustainability. The Ketchikan Indian Community would like to extend its support the Sitka Tribe of Alaska if they would like to work on a program to obtain useful data that is respectful to the tribal community.

The Southeast Herring Conservation Alliance does not need to try to impose their uninformed will on the subsistence sector of this fishery. This group does not need to make rules and regulations for people who they do not represent. It is likely that these individuals do not understand the cultural significance that is the herring. Like many coastal tribes around Alaska, the herring are held in high regard as a traditional resource of the sea. You see herring in our song, dance, artwork, and stories. It is obvious that this fish is much more than just food or a paycheck. The herring bring life to our environment and tribal



communities. By adding another barrier, such as the proposed permit in proposal 161, to the harvest of this resource, you are attempting to take away a part of the culture of people who have existed for generations.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species. The overseeing management agency has a critical job and obligation to protect Pacific herring, supporting this proposal does nothing to accomplish that goal.

The Ketchikan Indian Community Tribal Government would like to extend its hand, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are applicable to the management of most fish and game species in our region. We would welcome, encourage, and expect consultation when tribally significant resources have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through the immense value of traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa
Respectfully,

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #110 reporting of gear loss

In regards to proposal #110, dealing with reporting of gear loss, the Ketchikan Indian Community Tribal Government is in full support of implementation into regulation.

The Ketchikan Indian Community Tribal Government would like to go on the record that we are committed to finding solutions to keep all species, both commercial and non-commercial, sustainable for all to enjoy for generations to come.

“Ghost fishing” as it is called, can have significant negative impacts to localized fish populations sustainability, especially with net gear types. As stated in the proposal itself, the loss of gear in our waters have negative impacts to finfish and marine mammal species alike and should be reported to the proper authorities so that a “clean-up” can be done, if possible. There are many



examples around the world where ghost fishing is common and is causing major harm.

The Ketchikan Indian Community Tribal Government feels that this rule should be applied to all commercial fishing activities, as well as any fishing activities that involve long net or longline gear types. We firmly believe that this would be a good step in the right direction to keep our fisheries sustainable. While it will not fix all of southeast Alaska fisheries woes, it will have significant impacts on local fisheries if it is conducted in a manner that is useful.

As long as it is deemed that there was no foul play or intentional neglect on fishing operations, we do not feel that there should be any penalty for gear that is lost. Gear loses integrity over time and is often hard to tell if a line is going to snap. This proposal should be encouraging of those who lose gear to come forward so that it can be addressed so there is limited damage to the ecosystem. However it goes without saying that if there is foul play, negligence, or failure to report loss of gear, there should be some sort of penalty associated with it. This penalty would change with the severity of the circumstances of the gear loss.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with gear loss, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through



traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #159 regarding changes in sac roe vs subsistence harvesting times.

In regards to proposal #159 which deals with the harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its opposition to the implementation as it not supportive of subsistence fishing activities in the Sitka Sound area.

Pacific herring (*C. pallasii*), also known has iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can utilized for future generations of people and animals.



The Ketchikan Indian Community Tribal Government would like to address some of the claims that the Southeast Herring Conservation Alliance make in proposal 159 as some seem misleading. There are some comments that are made that claim this alliance can designate areas that are culturally significant to harvest for the Tribal Citizens for the Sitka Tribe of Alaska. At best these remarks highly uninformed, at worst these remarks are intentionally trying to destroy a part of traditional culture in Sitka through competitive exclusion all for the pursuit of profit. These remarks are seen as an attack on Indigenous culture throughout southeast Alaska and the Ketchikan Indian Community will not stand for it. This is something that must be looked at by the state of Alaska and the Alaska Board of Fisheries.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Southeast Herring Conservation Alliance does not need to step foot in the subsistence sector of this fishery. This group does not need to make rules and regulations for people who they do not represent. It is likely that these individuals do not understand the cultural significance that is the herring. Like many coastal tribes around Alaska, the herring are held in high regard as a traditional resource of the sea. You see herring in our song, dance, artwork, and stories. It is obvious that this fish is much more than just food or a paycheck. The herring bring life to our environment and tribal communities



The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #144 regarding logbook reporting for nonresidents

In regards to proposal #144 dealing with logbook reporting for nonresident sport fishers in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

The Sitka Fish and Game Advisory Committee does a very good job elaborating on how this can be easily implemented within the sport sector of our fisheries in southeast Alaska. Now more than ever we need these logbooks for critically important species including but not limited to king salmon, rockfish, and halibut. While the committee suggests halibut to be used for this logbook requirement, the Ketchikan Indian Community Tribal Government recommends doing for all harvestable species of finfish, shellfish, and beach seafood. This model can be very beneficial to the management of all species in our region.

The State of Alaska has the golden opportunity to make great strides for the management for sustainability of the biological resources in southeast Alaska. Out of all of the user groups for finfish, shellfish, beach foods, and game, nonresidents have the greatest capacity and capability to report harvest for the purposes of in-season management. People come from all over the world to



partake in fishing and hunting in the State of Alaska. These people spend thousands of dollars to enjoy the resources that we have. If these people are financially and physically able to come to Alaska to do these recreation activities, they are more than capable of writing down and reporting crucial data that would assist the State of Alaska to prioritize the sustainability of our resources.

We are aware that there is a number of programs to estimate the number of fish being harvested in our communities, with the primary one being creel surveying at ports. The Ketchikan Indian Community Tribal Government recognizes the benefits that come from these programs, but they do not cover the entirety of the nonresident sport fishing sector, which again has the capability to do these reporting activities.

The Ketchikan Indian Community Tribal Government would also like to go a step further and differentiate and require CATCH and HARVEST records from nonresident sport fishers.

Catch defined as: all organisms that were brought to the surface, whether or not they were landed or not, but not harvested.

Harvest defined as: all organisms that were kept resulting death, regardless of the use of the organism.

Data that would be useful to gather could include: species, date caught, time caught, estimated depth, and location, among others as the managers see fit.

There is a substantial difference between catch and harvest. Harvest is very simple as you can easily tell how many fish were killed in the process of fishing. Catch is a bit more complicated but it is just as important to paint a better picture on what is happening with our resources. We sure that the Alaska Department of Fish and Game is aware that there is an associated mortality rate with catch and release fishing. Species like king salmon and rockfish have especially high mortality after released by anglers. The Ketchikan Indian Community Tribal Government finds it appropriate and essential for this type



of data to be collected to ensure the sustainability of our finfish in southeast Alaska.

The Ketchikan Indian Community Tribal Government wants to make clear in this comment that this is not meant to be an “attack” on the nonresident sport fishers in that come to Alaska. We recognize that these people bring in a flux of money to our local economies every year. However, we all must recognize that these are Alaskans resources especially that of the Indigenous people of the land. Like many Alaskans, we utilize this resource as a way of putting food on the table. Whether that reason be due to financial and/or culture reasons, it always seems that locals are having to bear the burden of the work. Nonresidents are financially and physically able to put in the minimal effort to help provide these resources for generations to come for all user groups.

However, this can only be successful if this is going to be enforced. Failure to report should result in some sort of fine and/or revoking of future licenses. People will not report unless they are incentivized. We believe this is something that the state of Alaska has the authority to do and should be done.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with nonresident reporting of harvest (and catch), which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,



Gloria Burns

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #158 regarding age structure composition for the Sitka
Sac Roe herring fishery

In regards to proposal #158 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for fishers of all user groups more sustainably harvest herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Sitka Tribe of Alaska provides a number of valid considerations that would make this proposal worth putting into place with our management system



through the Alaska Department of Fish and Game. As with many of our species here in the State of Alaska, the older and larger individual species within their population make big contributions towards recruitment back into the ecosystem. This is huge. This is where the “BOFFFF theory” comes into play. Bigger, older, fatter females will result in more fecund fish. These larger females also result in roe that has higher success rates of recruitment compared to fish of smaller sizes because more energy is being put into each egg. There is more that we can go into, but we feel that the research, and the review, done by the Sitka Tribe of Alaska is sufficient.

This proposal ensures that there is not as a dramatic drop off in population age structure of the Pacific herring in the Sitka Sound area, and to be quite frank a model similar to this should also be implemented in every fishery in the state of Alaska. Dynamic age structure is important for population success, and the Alaska Board of Fisheries and the Alaska Department of Fish and Game need to seriously consider looking into this type of management practices for the long term sustainability of this resource.

Additionally, the Sitka Tribe of Alaska put in a lot research that ultimately was laid out into their proposal. There are a number of academic journal articles come from respected scientists and accredited institutions that supports the claims that the Sitka Tribe of Alaska is making. These management practices can work, but we need to be willing to make the jump to these practices. The status quo, for this fishery especially, is no longer an option. We need to find better ways to make sure that we keep this fishery sustainable. Otherwise no one will be able to benefit from it any longer. This includes both subsistence users and commercial fishers alike.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.



As stated by the Sitka tribe of Alaska, no one wants this valuable fishery to come to a moratorium. The Ketchikan Indian Community Tribal Government feels very strongly about this as many of tribal citizens rely on commercial fisheries for a source of income. We've seen moratoriums in the past that have displaced a number of people from their livelihoods. The Atlantic cod fishery collapsed in 1992, and resulted the displacement of 1000's of people in eastern Canada. Southeast Alaska's fisheries are a bit more diverse than that of Canada's, but we don't see any good from an economic standpoint of getting to that point. However, that being said, the sustainability of the Pacific herring will always come before profits. Again, this proposal is designed in such a manner that we avoid any long term moratoriums.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,



Gloria Burns

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #157 regarding commercial harvest of herring in Sitka Sound.

In regards to proposal #157 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for fishers of all user groups more sustainably harvest herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Sitka Tribe of Alaska provides a number of valid considerations that would make this proposal worth putting into place with our management system



through the Alaska Department of Fish and Game. As with many of our species here in the State of Alaska, the older and larger individual species within their population make big contributions towards recruitment back into the ecosystem. This is huge. This is where the “BOFFFF theory” comes into play. Bigger, older, fatter females will result in more fecund fish. These larger females also result in roe that has higher success rates of recruitment compared to fish of smaller sizes because more energy is being put into each egg. There is more that we can go into, but we feel that the research, and the review, done by the Sitka Tribe of Alaska is sufficient.

This proposal ensures that there is not as a dramatic drop off in population age structure of the Pacific herring in the Sitka Sound area, and to be quite frank a model similar to this should also be implemented in every fishery in the state of Alaska. Dynamic age structure is important for population success, and the Alaska Board of Fisheries and the Alaska Department of Fish and Game need to seriously consider looking into this type of management practices for the long term sustainability of this resource.

Additionally, the Sitka Tribe of Alaska put in a lot research that ultimately was laid out into their proposal. There are a number of academic journal articles come from respected scientists and accredited institutions that supports the claims that the Sitka Tribe of Alaska is making. These management practices can work, but we need to be willing to make the jump to these practices. The status quo, for this fishery especially, is no longer an option. We need to find better ways to make sure that we keep this fishery sustainable. Otherwise no one will be able to benefit from it any longer. This includes both subsistence users and commercial fishers alike.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.



As stated by the Sitka tribe of Alaska, no one wants this valuable fishery to come to a moratorium. The Ketchikan Indian Community Tribal Government feels very strongly about this as many of tribal citizens rely on commercial fisheries for a source of income. We've seen moratoriums in the past that have displaced a number of people from their livelihoods. The Atlantic cod fishery collapsed in 1992, and resulted the displacement of 1000's of people in eastern Canada. Southeast Alaska's fisheries are a bit more diverse than that of Canada's, but we don't see any good from an economic standpoint of getting to that point. However, that being said, the sustainability of the Pacific herring will always come before profits. Again, this proposal is designed in such a manner that we avoid any long term moratoriums.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

Gloria Burns

Gloria Burns





Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #156 regarding quotas and guideline harvest for Sitka Sac roe commercial fisheries.

In regards to proposal #156 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for fishers of all user groups more sustainably harvest herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



The Ketchikan Indian Community Tribal Government believes that this proposal is a no brainer in terms of implementation. The state of Alaska already uses the management practices that the Sitka Tribe of Alaska is trying to implement in Sitka Sound. While we understand that sometimes different subpopulations of organisms need different types of management practices, this is not one of those cases for southeast Alaska's herring fisheries. It is apparent that harvesting at higher rates within the Sitka Sound fishery is not achieving the goal of sustainability.

Additionally, the Sitka Tribe of Alaska put in a lot research that ultimately was laid out into their proposal. There are a number of academic journal articles come from respected scientists and accredited institutions that supports the claims that the Sitka Tribe of Alaska is making. These management practices can work, but we need to be willing to make the jump to these practices. The status quo, for this fishery especially, is no longer an option. We need to find better ways to make sure that we keep this fishery sustainable. Otherwise no one will be able to benefit from it any longer. This includes both subsistence users and commercial fishers alike.

The Sitka Tribe of Alaska, as well as the Ketchikan Indian Community, are in support of responsible harvesting practices for all user groups of the herring resources in all of Alaska. However, the Ketchikan Indian Community recognizes that the quantity of resources harvested by tribal citizens is insignificant and minimum when compared to the commercial sac roe fishery. The Ketchikan Indian Community further recognizes that the commercial sector has to make a profit, but the tribes will not sacrifice the essential cultural and dietary needs to the benefit of those who are not culturally connected the land and sea in Alaska.

As stated by the Sitka tribe of Alaska, no one wants this valuable fishery to come to a moratorium. The Ketchikan Indian Community Tribal Government feels very strongly about this as many of tribal citizens rely on commercial fisheries for a source of income. We've seen moratoriums in the past that have displaced a number of people from their livelihoods. The Atlantic cod fishery collapsed in 1992, and resulted the displacement of 1000's of people in eastern Canada. Southeast Alaska's fisheries are a bit more diverse than that of Canada's, but we don't see any good from an economic standpoint of getting to that point. However, that being said, the sustainability of the Pacific herring will always



come before profits. Again, this proposal is designed in such a manner that we avoid any long term moratoriums.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

A handwritten signature in black ink that reads "Gloria Burns".

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #160 regarding the reduction of closed area for the Sitka
Sac Roe fishery

The Ketchikan Indian Community is in strong opposition of proposal #160 regarding subsistence fishing permits for harvesting herring roe on branches in the Sitka Sound Area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The proposal written by the Southeast Herring Conservation Alliance, a group of organized commercial sac roe herring fishers, is a direct attack on the rights



of Indigenous people of southeast Alaska. This misinformed group does not understand customary and traditional use by rural Alaska natives and wishes to enforce an unnecessary regulation on the Tribal Citizens of Sheetka (Sitka). In the proposal written by the Southeast Herring Conservation Alliance, they directly site the litigation between the Sitka Tribe of Alaska and the State of Alaska. It is not the fault of the tribal citizens that the population of the herring in Sitka is of low abundance, but it seems that the Southeast Herring Conservation Alliance thinks that way.

Additionally, one thing that we would like to address about the reasoning of this proposal is that the authors claim that the allocation of herring roe was "artificially inflated." No, this number better meets the needs of the subsistence users that rely on this resource throughout the year. The Southeast Alaska Herring Conservation Alliance has no business dictating how much food tribal citizens put in their freezers. We do not tell these commercial fishers how much beef or chicken they put in their freezers and feel that same respect should be reciprocated.

We would like to address the specifics of this proposal as there seems to be some misconceptions on the traditional harvest of herring eggs in the Sitka area. First and foremost. The state of Alaska has the obligation of providing sufficient access to subsistence users of natural resources before any other user group. Sufficient access meaning that they can harvest enough to support themselves and their families, and they are given opportunities to harvest in a safe manner. The quantity of harvest is straightforward. However, it seems that there is some confusion about what is classified as safe harvesting opportunities. Contrary to the belief of some, the majority of subsistence users are not monetarily wealthy. There are thousands of families in southeast Alaska that ~~could easily fall under the poverty line. What does this have to do with safety?~~ Well everyone does not have access to large \$50,000-\$1,000,000 vessels that can take multiple harvesters to far off places to harvest these traditional foods. The Sitka Sound area can have extremely bad weather during herring egg season. No one should be expected to travel miles away from port in small skiffs to harvest something they have an inherent right to do so anywhere so long as it is done responsibly.



The Ketchikan Indian Community Tribal Government feels the need to remind the state managers and the commercial sac roe fleet that the one of the major goals of the management of our fisheries in Alaska is to make sure that there is lowest probability for loss of life of anybody. Any closure to near town areas goes against this ideal of keeping people safe. Again, subsistence users in Alaska are usually harvesting off of smaller vessels that do not take bad weather well.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #143 regarding in-season reporting of nonresident sport fish harvest.

The Ketchikan Indian Community Tribal Government is in strong support of proposal #143 regarding in-season reporting of nonresident sport fish harvest in southeast Alaska.

The State of Alaska has the golden opportunity to make great strides for the management for sustainability of the biological resources in southeast Alaska. Out of all of the user groups for finfish, shellfish, beach foods, and game, nonresidents have the greatest capacity and capability to report harvest for the purposes of in-season management. People come from all over the world to partake in fishing and hunting in the State of Alaska. These people spend thousands of dollars to enjoy the resources that we have. If these people are financially and physically able to come to Alaska to do these recreation activities, they are more than capable of writing down and reporting crucial data that would assist the State of Alaska to prioritize the sustainability of our resources.

We are aware that there is a number of programs to estimate the number of fish being harvested in our communities, with the primary one being creel surveying at ports. The Ketchikan Indian Community Tribal Government recognizes the benefits that come from these programs, but they do not cover the entirety of the nonresident sport fishing sector, which again has the capability to do these reporting activities.



As stated in the reasoning for this regulatory change, only species with an associated annual limit are reported to the Alaska Department of Fish and Game, which would include important species like king salmon. However we, the Ketchikan Indian Community Tribal Government, find it imperative that the reporting expand to all species regardless of annual limit status. The Indigenous of people utilize all of the resources within our lands and seas. In the 21st century, data is essential for the successful management of all of our resources. Although most species in Alaska do not have annual limits for nonresident sport fishers, we should use this as an opportunity to collect this data.

The Ketchikan Indian Community Tribal Government would also like to go a step further and differentiate and require CATCH and HARVEST records from nonresident sport fishers.

Catch defined as: all organisms that were brought to the surface, whether or not they were landed or not, but not harvested.

Harvest defined as: all organisms that were kept resulting death, regardless of the use of the organism.

Data that would be useful to gather could include: species, date caught, time caught, estimated depth, and location, among others as the managers see fit.

There is a substantial difference between catch and harvest. Harvest is very simple as you can easily tell how many fish were killed in the process of fishing. Catch is a bit more complicated but it is just as important to paint a better picture on what is happening with our resources. We sure that the Alaska Department of Fish and Game is aware that there is an associated mortality rate with catch and release fishing. Species like king salmon and rockfish have especially high mortality after released by anglers. The Ketchikan Indian Community Tribal Government finds it appropriate and essential for this type of data to be collected to ensure the sustainability of our finfish in southeast Alaska.



The Ketchikan Indian Community Tribal Government wants to make clear in this comment that this is not meant to be an “attack” on the nonresident sport fishers in that come to Alaska. We recognize that these people bring in a flux of money to our local economies every year. However, we all must recognize that these are Alaskans resources especially that of the Indigenous people of the land. Like many Alaskans, we utilize this resource as a way of putting food on the table. Whether that reason be due to financial and/or culture reasons, it always seems that locals are having to bear the burden of the work. Nonresidents are financially and physically able to put in the minimal effort to help provide these resources for generations to come for all user groups.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with nonresident reporting of harvest (and catch), which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

A handwritten signature in black ink that reads "Gloria Burns". The signature is written in a cursive style with a large initial "G".

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #162 regarding increase in harvest limits for subsistence users.

In regards to proposal #162 which deals with quotas and guideline harvest of the herring roe on kelp, the Ketchikan Indian Community would like to show its full support as we see this as a way for subsistence fishers of southeast Alaska to have better access to traditional foods that sustains them throughout the year.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.



This proposal is something that the Ketchikan Indian Community Tribal Government can get behind. Our government will always encourage opportunities for tribal citizens to harvest traditional foods in their area so long as it is done responsibly. The traditional resource that our tribal citizens always get excited for is herring roe on kelp/branches. However, we feel the current limits are far too low for a family to sustain themselves throughout the year.

We feel that this proposal increases the amount that is still sustainable no matter what region this resource is being harvested from. In reality, the subsistence fisheries throughout the state of Alaska are negligible for management purposes for the sustainability. Therefore the Ketchikan Indian Community strongly encourages the Alaska Board of Fisheries to consider this proposal and its implementation.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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(907) 228-4900 Phone
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Comment for Proposal #116 regarding King Salmon retention during
nonretention periods

In regards to proposal #116 dealing with retention of king salmon during periods of non-retention, the Ketchikan Indian Community Tribal Government opposes this proposal as we do not see this benefitting any user group in the short or long term.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeeh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.



The Ketchikan Indian Community Tribal Government would like to address the major concerns as it pertains to proposal #116. While we see positive intent with this proposal, this proposal can turn into a major slippery slope that can end up doing more harm than good. It is well known that there is an associated mortality rate with catch and release fishing for any species of finfish, and king salmon is no exception to this rule. However, the benefits here do not outweigh the potential detriments that this proposal creates.

As a tribal entity, we pride ourselves in making sure that harvesting practices are as efficient with as little waste as possible. This is something that we as government and the author of this proposal can agree on. While there is good intent with this proposal, we can see people abusing this new rule. This abuse could potentially be in the form of taking in additional profit, taking in fish resources for the benefit of consumption of the commercial fisher, and potentially not being reported and sold "under the table." The Ketchikan Indian Community Tribal Government does not want to assume the worst in people, but the reality is that this is very possible that can happen.

Additionally, the king salmon stocks in many of our watersheds are well below escapement goals throughout southeast Alaska. We have to give every opportunity for this fish to return back to their natal streams so that they contribute to future recruitment back into the population. This proposal does NOT accomplish this goal.

To reiterate, the priority here is to not allow this proposal to be accepted by the Alaska Board of Fisheries.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with retention of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the



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Respectfully,

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Gloria Burns



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(907) 228-4900 Phone
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Comment for proposal #164 regarding equal share harvesting for the Sitka Sac
Roe Herring fishery

In regards to proposal #164 which deals with quotas and guideline harvest of the Sitka sac roe herring fishery, the Ketchikan Indian Community would like to show its opposition as we do not see this supporting the goal of long term sustainability of Pacific herring in this region.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to address our concerns as it relates to this proposal. The biggest thing that stands out to us in



regards to this proposal is that it this type of fishery allows for fishers to be selective of what fish they harvest and what type of fish they release back into the water. This is something that is very concerning to the Ketchikan Indian Community. As with any fish, there is an associated mortality rate that comes catch and release activities. Herring are a relatively delicate fish and there is a higher mortality when they are caught using seine nets. We do not believe that this is beneficial to the population during the long term. No fish should ever be wasted if we are attempting to harvest it. The only thing that would make this proposal worth considering is if they would be required to harvest everything that comes into their nets. No exceptions. Additionally, the implementation of vessel observers would make our tribal government more willing to consider this proposal.

The authors of this proposal also claim that there would be very little need for enforcement and in season management for this type of fishery but the Ketchikan Indian Community Tribal Government cannot see how this would be the case. With fishing activities spread over a long period of time, this is ultimately going to cost the state of Alaska thousands if in millions of dollars to oversee this fishery if it were to be extended. The southeast Alaska Sitka Sac Roe herring fishery is one of the most contentious fisheries in the state right now. To even remotely suggest that less resources should be funneled into the management of this fishery is not only absurd, but raises some questions on the validity of the authors intent with this proposal.

As this proposal addresses the need for keeping people and property safe, which the Ketchikan Indian Community Tribal Government also values, there needs to be another solution that meets this requirement. We feel something more can be done to keep people safe while keeping the long term sustainability of this resource together.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the



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Let this be an invitation to the State of Alaska that the Ketchikan Indian
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Respectfully,

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Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #92 regarding King Salmon retention in terminal harvest areas

In regards so proposal #92, dealing with king salmon retention in terminal harvest areas, the Ketchikan Indian Community would like to address some concerns we have with the implementation and express our opposition for this proposal as it does not follow our goal of protecting natural resources for all.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeesh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan



Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

We understand the intent behind this proposal is good. As the Indigenous people of this land we pride ourselves on not being wasteful of the resources that are harvested in both land and sea. However we also believe this can lead down a slippery slope of regulations that can harm king salmon in all regions of Alaska, not just terminal harvest areas near salmon hatcheries and release sites.

King salmon in our area are currently being harvested by every user group, which means that there is a lot of exploitation pressure on this species on top of natural mortality and predation pressures. We understand the frustration that the author of this proposal is feeling when he sees another gear type being able to harvest undersized fish, however out of any gear group throughout all commercial fishers, the trollers have the highest probability to king salmon alive after being caught. Any other gear group that harvests salmon have close to 100% mortality rates. While it is an issue undersized salmon are being harvested all over the state, this has to deal with current technology and lack of localized exclusion of smaller fish. For the purposes of this comment, we don't believe that the just because one person can do it, doesn't mean everyone (although anyone would be more appropriate) should do it. To sum up this response, we believe that this can turn into a slippery slope for over harvesting in all areas of Alaska. First it will start in terminal harvest areas, but that leaves the door open for fish poaching and harvesting undersized fish outside of terminal harvest areas.

To address undersized fish in this proposal, the author claims that many fish could be just returning as jacks and therefore should be harvested anyways. While there is some truth to that, salmon are known to be unpredictable with migration throughout its lifecycle. Can we really know for certain that these



fish are coming back to die? Are these fish just milling around close to their natal stream for extended periods of time? We are not confident there is enough research done in a lot of our areas to determine if what is common. The bottom line is that we do not want to risk any young fish that have the potential to grow to maturity and reproduce in our waters, regardless if they are natural or wild stock. Everyone is aware that king salmon in Alaska are struggling, we all need to act like it and do what we must to protect them for their long term sustainability.

We do agree with the author of this proposal that net fishers being allowed to sell non-target finfish species while other gear types can is unacceptable, but we do not think this is the correct approach. There has to be another solution to this.

This proposal is not meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else.

Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.



The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with retention of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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Gloria Burns



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2960 Tongass Avenue — Ketchikan, AK 99901
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Comment for Proposal #169 regarding the sac roe fishery in Behm Canal

In regards to proposal #169 which deals with quotas and guideline harvest of the Behm Canal sac roe herring fishery, the Ketchikan Indian Community would like to show its full support as we see this as a way for this fishery to become more sustainable for this area.

Pacific herring (*C. pallasii*), also known as iinaang in Haida, yaaw in Tlingit, and shga in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the southeast Alaska. The tribal community in Ketchikan especially holds Pacific herring in high regard as a culturally significant resource. The months of March, April, and May are very important for tribes around southeast Alaska as it is a time of celebration and cultural connection as the herring bring new life into this world. They provide for the environment and the people along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to address some of the aspects of this proposal as it relates to the Ketchikan area.



The Behm Canal herring fishery is not and has not been at historical levels for years. Whether this is a result from overexploitation or changing environmental conditions is irrelevant. This subpopulation of herring needs to have further protections so it has a chance to come back to these historical levels our tribal citizens once experienced long ago. It is shown the sac roe fisheries are harmful at almost any exploitation rates. While there hasn't been an opening in this area in some time, we should do away with the sac roe fishery altogether in this area. The abundance levels need to go back to historical levels before we even consider trying to reopen anything, not when we just start to see an uptick in abundance.

The Behm canal fishery is also at risk of losing another forage fish in this area, the Eulachon or ooligan. There is a small run of Eulachon that return to the Joonax (Unuk) river that also is nowhere near historical levels of abundance. Any commercial fishery that involves nets in this area during the months of February through April has the opportunity to harvest Eulachon as bycatch. This is unacceptable in the eyes of the Ketchikan Indian Community Tribal Government. The Alaska Department of Fish and Game and the Alaska Board of Fisheries has the obligation to protect this culturally significant traditional resource at all costs. The Tribal Citizens of the Ketchikan Indian Community should have opportunities in the future to harvest these resources and the implementation of this proposal gives them better chance of doing so down the road.

The Ketchikan Indian Community Tribal Government would also like to state that the herring are critical for the balance of our environment. Many ecologists classify Pacific herring as a "keystone species." This means that the food web is centralized around Pacific herring, and if it were to be taken out of the food web every other organism would be significantly negatively impacted. Whales, seals, salmon, rockfish, among many other species.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with herring, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally



significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

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Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #86 regarding King Salmon allocation to nonresident fishers in the southeastern Alaska-Yakutat area

In regards to proposal #86 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeesh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan



Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

This proposal simply states that the state of Alaska has the obligation to protect the rights of residents of Alaska, especially the Indigenous people of Alaska. The people who live here should be never be at risk this year. The Alaska Department of Fish and Game did recognize that in the summer season of 2021 the harvest of nonresident sport fishers was higher than anticipated. Regardless of the timing of it, the Department should always use this as a tactic to assure that residents always have access to these resources.

While it is addressed in a number of proposals in this meeting cycle, the Ketchikan Indian Community Tribal Government would like to provide suggestions to help out with the management of nonresident sport fishers:

1. Reporting catch AND harvest records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

2. Intermittent closures during the week seem to have a positive impact on the management of halibut, we fell that a version of this can be very useful impact on king salmon as well.



This proposal is not meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,
Respectfully,

Gloria Burns

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Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #85 regarding King Salmon allocation to nonresident
fishers in the southeastern Alaska-Yakutat area

Ketchikan Indian Community

<http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2021-2022/proposals/85.pdf>

KIC's Position:

☒ SUPPORT; ☐ OPPOSE: ☐ ADDITIONAL RECOMNDATIONS

Specie(s) Impacted:

☒ (King) Salmon ☐ Eulachon ☐ Herring ☐ Shellfish

Activity(s) Addressed:

☒ Subsistence Fishing ☐ Commercial Fishing ☒ Sport Fishing
☒ Charter Fishing ☒ Non-Resident Fishing ☐ Gathering Seaweed
☐ Gear Regulations

Community(s) Affected:

☐ Ketchikan ☐ POW ☒ SEA Region Wide ☐ Tribal



In regards to proposal #85 dealing with kings salmon allocation in southeast Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as this is a good way to protect the culture of Indigenous people that exists on these lands.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeesh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

This proposal simply states that the state of Alaska has the obligation to protect the rights of residents of Alaska, especially the Indigenous people of Alaska. The people who live here should be never be at risk this year. The Alaska Department of Fish and Game did recognize that in the summer season of 2021 ~~the harvest of nonresident sport fishers was higher than anticipated.~~ Regardless of the timing of it, the Department should always use this as a tactic to assure that residents always have access to these resources.

While it is addressed in a number of proposals in this meeting cycle, the Ketchikan Indian Community Tribal Government would like to provide suggestions to help out with the management of nonresident sport fishers:



1. Reporting catch AND harvest records for lodges and guides, this should feel like an obvious place to start for management of these species. Of all user groups, sport fishers have the resources to be able to keep track of all catch and harvest records of ALL species that they are bringing in. We believe if they have the resources to travel to Alaska and fish in our waters, they are able to this reporting.

Additionally, the Board of Fish needs to put together enforcement of this reporting on nonresident fishing, however it may look. An idea that could be implemented is that if a nonresident sport fisher fails to report their catch and harvest records, they shall be prohibited from obtaining another fishing permit in the future. Perhaps a fine could be implemented as well.

2. Intermittent closures during the week seem to have a positive impact on the management of halibut, we felt that a version of this can be very useful impact on king salmon as well.

This proposal is not to meant to be a direct attack at anyone or any user group. We understand money is brought into the state through nonresident sport fishing activities, but we cannot and will not risk our culture and lifestyle.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else.

Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their



lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with allocation of king salmon, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

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(907) 228-4900 Phone
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Comment for Proposal #210 regarding closure of waters for commercial
Dungeness crab fisheries near Hydaburg, Alaska.

In regards to proposal #210 dealing with Dungeness crab in the Hydaburg area, the Ketchikan Indian Community Tribal Government supports the proposal as it a good way to give priority to the subsistence users of southeast Alaska.

Dungeness crab (*C. magister*), also known as k'ust'aan in Haida, s'aaw in Tlingit, and k'almoos in Tsimshian have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds crab in high regard as a culturally significant resource. Many people rely on crab as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

The Ketchikan Indian Community Tribal Government would like to show its support for the implementation of proposal #210 as this is something that is important to the tribal community of Hydaburg.



The residents of Hydaburg live in a very remote area that does not have reasonable access to large grocery stores to sustain them throughout the year, which is why those residents heavily rely on the traditional resources that can be found around them in that area. The Alaska Department of Fish and Game and the Alaska Board of Fisheries has the obligation to prioritize subsistence and personal use harvesting of any species before any other user group. The community of Hydaburg is well within their rights to make this request as they are seeing real declines in crab populations throughout the area. Whether the declines are the result of climate change, overexploitation, or sea otters are irrelevant. This is being seen through the scope of traditional ecological knowledge. This is an area that the Alaska Department of Fish and Game and the Alaska Board of Fisheries really needs to get into as this information can pair well with the ideologies of western science to come to more holistic approaches to fisheries management in the state of Alaska. The information coming from the subsistence and personal users of the area is useful and needs to be taken into consideration when it comes to these decisions.

The Ketchikan Indian Community Tribal Government requests that the Alaska Board of Fisheries seriously considers the implementation of this proposal as it will have profound benefits for the residents of the community of Hydaburg, Alaska and not give into profits that may be made in the short term for a small group of people.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with crab in the Hydaburg area, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,
Respectfully,

Gloria Burns

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #232 regarding the creation of a commercial spiny dogfish fishery

In regards to proposal #232 dealing with the creation of a new spiny dogfish fishery in southeast Alaska, the Ketchikan Indian Community Tribal Government supports this proposal as it is a good way to reduce waste and provide more opportunities within the commercial fishery for the citizens of Alaska.

Spiny Dogfish (*S. acanthias*), also known as k'aad in Haida, x'atgu in Tlingit, and ggashggaads in Tsimshian have profound impacts within our deep water ecosystems and food webs. They provide for the environment all along the coast. It is the Ketchikan Indian Community's firm belief that we, as a community, need to protect and conserve this resource as much as possible so that it can be utilized for future generations of people and animals.

The Ketchikan Indian Community Tribal Government would like to express its support for this proposal while addressing some of the factors that are being made by the author of this proposal.

The author claims that the spiny dogfish fishery in southeast Alaska is underutilized. As a tribal government, we agree on the basis that many spiny dogfish are being tossed overboard dead as a result of their incidental catch through longline and pot fisheries. We find this to be unacceptable as our values as Indigenous people guide us to not waste any resource that we come



across, not matter what it is. Therefore, it is imperative that this harvest be utilized in some sort of manner. As the author claims in their proposal, there are many uses for spiny dogfish all over the world. One major use that the author does not go over is its uses in the classroom. Spiny dogfish are used in basic biology and ichthyology classrooms all around the world, especially here in Alaska for the uses of dissection. These dissections are critical for the early education of fisheries biologists, marine biologists, and oceanographers alike. The state of Alaska can easily contribute to this knowledge to young learners and help engage future managers for our state.

One thing that we would like to address however is that we have to really understanding the spiny dogfishes functional biology, life history, and behavior before we can start a full on commercial fishery for them. Many of the organisms that fall under the class of Chondrichthyes (cartilaginous fishes that include sharks, skates, rays, and chimeras) have life history traits that make them easily susceptible to overexploitation by humans. The Alaska Department of Fish and Game and the Alaska Board of Fisheries must be very careful if this fishery were to be created outside of allowable bycatch for other fisheries. Our recommendation would be to test out some management practices through a pilot fishery that would allow the Alaska Department of Fish and Game to better understand this species without southeast Alaskan waters.

In summary, the Ketchikan Indian Community Tribal Government is in support of this proposal if it is done responsibly such that this species is sustainable throughout time. Again, we want to reduce the amount of waste within our existing fisheries.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with spiny dogfish, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian



Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

Gloria Burns

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #177 regarding closed waters for shrimp in the Hydaburg area.

In regards to proposal #177 dealing with shrimp fisheries near the Tribal Community of Hydaburg, Alaska, the Ketchikan Indian Community Tribal Government supports the proposal as it a good way to give priority to the subsistence users of southeast Alaska.

Shrimp (*Caridae*), also known as dag in Haida, and s'eex'at in Tlingit, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds shrimp in high regard as a culturally significant resource. Many people rely on shrimp as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.

The Ketchikan Indian Community Tribal Government would like to show its support for the implementation of proposal #177 as this is something that is important to the tribal community of Hydaburg.



The residents of Hydaburg live in a very remote area that does not have reasonable access to large grocery stores to sustain them throughout the year, which is why those residents heavily rely on the traditional resources that can be found around them in that area. The Alaska Department of Fish and Game and the Alaska Board of Fisheries has the obligation to prioritize subsistence and personal use harvesting of any species before any other user group. The community of Hydaburg is well within their rights to make this request as they are seeing real declines in shrimp populations throughout the area. This is being seen through the scope of traditional ecological knowledge. This is an area that the Alaska Department of Fish and Game and the Alaska Board of Fisheries really needs to get into as this information can pair well with the ideologies of western science to come to more holistic approaches to fisheries management in the state of Alaska. The information coming from the subsistence and personal users of the area is useful and needs to be taken into consideration when it comes to these decisions.

The Ketchikan Indian Community Tribal Government requests that the Alaska Board of Fisheries seriously considers the implementation of this proposal as it will have profound benefits for the residents of the community of Hydaburg, Alaska and not give into profits that may be made in the short term for a small group of people.

The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals shrimp in the Hydaburg area, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.



Haw'aa,
Respectfully,

Gloria Burns

Gloria Burns



Office of the President

2960 Tongass Avenue — Ketchikan, AK 99901
(907) 228-4900 Phone
www.kictribe.org

Comment for Proposal #83 Allocation of King salmon in the southeastern Alaska-Yakutat area

In regards to proposal #83 dealing with king salmon allocation, the Ketchikan Indian Community Tribal Government would like to show its opposition to its implementation.

King salmon (*O. tshawytscha*), also known as sgaawahl in Haida, t'a in Tlingit, and yeesh in Tsimshian, have profound cultural and dietary significance to the Indigenous people all over the State of Alaska. The tribal community in Ketchikan especially holds king salmon in high regard as a culturally significant resource. It is relatively more accessible than other traditional resources that we have in our area primarily because they can be harvested along the road system. We bring up this fact because many of our tribal citizens do not have reliable access to motorized vessels that which they can go harvest other traditional resources such as halibut, black seaweed, and sockeye salmon. Many people rely on king salmon as a food resource throughout the year, and it is the Ketchikan Indian Community's firm belief that we need to protect and conserve this resource as much as possible.



The management agency and overseeing policy drivers (ADFG and AK Board of Fish) have an obligation to protect a species that is currently in low abundance all across the state of Alaska. While it is important for all user groups to have access to these resources, we must assure that allocation of fish are appropriated in respectable fashion. While we understand that nonresident sport fishers come to Alaska to harvest, which in turn supports our economy, they do not rely on this resource to live. This is a luxury to this user group. However the subsistence, personal use, and commercial fishers use this to sustain life for them and their families. During these trying times the ADFG needs to prioritize the people of Alaska before anyone else.

One issue that we especially take issue is that this proposal does not leave room for written closure of the nonresident sport fish harvest of king salmon. One could potentially say that this could come from item (i) in this proposals suggested regulation, but we believe that this needs to be written into the books such that the Alaska Department of Fish and Game has the obligation to shut fisheries down if there is any data suggestion that there is over harvest of allocation or lack of escapement in any king salmon river.

Additionally, it appears that this proposal is prioritizing the harvest of king salmon by nonresidents over residents. We feel that this is unacceptable.

The coronavirus pandemic is an (unfortunate) great example of why we need to protect these resources for the people who live here. In many of our communities store shelves were bare for weeks at a time due strains on the supply chain. Unfortunately we can't easily pop over to the next store or community to search for stocked places because there are/were none to be had. The Ketchikan Indian Community believes that if there is any sort of potential for the stock to crash further, due to overharvest, nonresident sport fishers should be the first group to be restricted, not the other user groups. There



might come a point where other user groups will have to restrict their harvest as well, but we don't want to get this backwards. There are other sport species that nonresidents can harvest and still get the Alaskan fishing experience. Residents, and Indigenous residents, should not their culture before people from down south come harvest what is not theirs.

This proposal is not to meant to be a direct attack at anyone or any user group. However, with this proposal, we do not feel the benefits outweighs the costs for any user groups, whether that be in the short or long term.

Another point that the Ketchikan Indian Community would like to address is that if there is any sort of under harvest by any user group throughout the fishing season the State of Alaska has an obligation to allow for subsistence and personal use fisheries to take advantage of these resources before anyone else. Again, this is not meant as a direct attack at anyone, but subsistence and personal use user groups rely on these resources to sustain life. These people use this as food to put on their families tables, not for a paycheck. Without sufficient access to these vital resources, many people will have to change their lifestyles significantly or move out of their homelands. This should be avoided at all costs and supported by all user groups alike. However, the Ketchikan Indian Community Tribal Government understands that many systems for king salmon are not reaching sufficient escapement that is so crucial for the long term sustainability.

These statements are not said without the consideration of how this will impact those who provide opportunities for nonresidents through charters. While we sympathize with potential economic losses for those people, we must remember that we have to protect the rights of resident Alaskans first.



The Ketchikan Indian Community Tribal Government would like to extend its hand out, as well its staff, to use this event as an opportunity for co-management of traditional resources of southeast Alaska. This particular proposal deals with King Salmon allocation in the southeastern Alaska-Yakutat area, which is significant to southeast Indigenous culture, but many issues like this are prevalent most fish and game species in our region. We would welcome, encourage, and expect consultation on tribally significant resources when they have ANY potential to be impacted in any way. The Tribes of southeast Alaska have a wealth of knowledge to contribute to the management of resources, especially through traditional ecological knowledge. Let this be an invitation to the State of Alaska that the Ketchikan Indian Community is ready, and has been for some time, ready and capable of being co-managers of these resources.

Haw'aa,
Respectfully,

A handwritten signature in cursive script that reads "Gloria Burns".

Gloria Burns

Submitted By
Kevan O'Hanlon
Submitted On
12/22/2021 9:34:07 PM
Affiliation



PC206
1 of 1

I am writing because I believe it is important to prioritize subsistence harvest, listen to and value traditional knowledge, and to manage the commercial herring fishery in such a way that ensures a resilient population for the future.

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Submitted By
Capt. Kevin Burchfield
Submitted On
12/14/2021 10:17:22 AM
Affiliation
Lost in Alaska Adventures, LLC



PC207
1 of 2

Phone
9073211405
Email
lostinalaska@gci.net
Address
1016 Edwin Place
Juneau , Alaska 99801

I am Capt. Kevin Burchfield, owner and operator of Lost in Alaska Adventures LLC, a fishing guide service based in Juneau and I would like to make the following comments on selected BOF proposals:

84- Oppose...requires daily reporting as opposed to weekly as is currently required which places undue burden on the guided angler fishery...also appears to shift all of the conservation effort to the guided angler fishery...we believe all stakeholders must share the burden of conservation in times of low production. Singling out one subsection of the user groups for conservation is simply wrong and unjust!

85-Oppose... appears to shift all of the conservation effort to the guided angler fishery...we believe all stakeholders must share the burden of conservation in times of low production. Singling out one subsection of the user groups for conservation is simply wrong and unjust!

86-Oppose... appears to shift all of the conservation effort to the guided angler fishery...we believe all stakeholders must share the burden of conservation in times of low production. Singling out one subsection of the user groups for conservation is simply wrong and unjust!

146-Oppose...we do not believe there is any scientific need for Coho, Chum, Pink, or Sockeye to be restricted at this time.

155-Oppose...this would not allow the use of multiple hook systems for ground fish such as halibut...it's simply too far reaching in scope... some situations require removal of the fish from the water to properly remove any gear that could be detrimental to the health of the fish to be released...encouraging proper release technics we do endorse.

Submitted By
Capt. Kevin Burchfield
Submitted On
12/20/2021 9:31:06 AM
Affiliation
Juneau Charter Boat Operators Association



PC207
2 of 2

Phone
9073211405
Email
lostinalaska@gci.net
Address
1016 Edwin Place
Juneau, Alaska 99801

Marit Carlson Van Dort, Chairman

Alaska Board of Fisheries

1255 W. 8th Street
Juneau, AK 99811-5526

Re: King salmon management proposals 82 and 83

I am Capt. Kevin Burchfield, president of the Juneau Charter Boat Operators Association, we represent 12 fishing and whale watching operators in the Juneau area. I also own and operate Lost in Alaska Adventures...a fishing guide service in Juneau.

King salmon are critical to our operation all season, and especially early. Kings are one of just a few fish that really attract anglers to come to Alaska.

Talk a little about the problems caused by inseason regulation changes, closures, or annual limits that are too restrictive to attract and keep fisherman traveling to Southeast Alaska.

We do not support Proposal 82. We are concerned about the loss of opportunity for non-residents to keep kings in low abundance under this proposal. It also has the ability to manage non-residents inseason, so they never know what regulations to expect. Attracting fisherman that support local jobs, tax bases, and economies will take some suitable and stable limits at all abundance levels.

We support Proposal 83 that keeps workable regulations in low abundance and avoids inseason management. It would be much better for customers to have similar regulations year after year than to liberalize limits in high abundance years and get strict limits or closures in low abundance, or to close the fishery unexpectedly. It's hard to market and keep people traveling to our businesses and communities with unstable regulations.

The proposed cuts to sport regulations in Proposal 82 seem harsh from what sport fisherman have been allowed for a while. It seems important to have enough fish to keep residents open to get fish for the freezer and also to keep enough opportunity for non-residents to catch kings to keep them visiting Southeast Alaska every year. Proposal 83 does a better job for both resident and non-resident fisherman.

I hope the Board can find a fair tradeoff between all groups that take kings to keep both resident and non-resident sport fishing open all season with workable regulations during low runs. It will benefit Alaskans by helping put up food and keep people coming into our state at levels that have been a big boost to our households and the surrounding economy.

Sincerely,
Capt. Kevin Burchfield

Submitted By
Kimberly Ramos
Submitted On
12/22/2021 5:07:56 PM
Affiliation



PC208
1 of 1

Phone
8312619728
Email
Karamos17@gmail.com
Address
18240 Point Stephens rd
Juneau, Alaska 99801

Southeast Alaska is my home and I want Alaska's fisheries to be around for generations to come. I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Submitted By
kirk Agnitsch
Submitted On
12/22/2021 3:05:57 PM
Affiliation



PC209
1 of 1

Phone
9078263909
Email
surestrikecharters@aptalaska.net
Address
P.O. Box 987
Craig, Alaska 99921

To the members or the board:

i have 35 years invested in the alaska charter fishery. My wife , myself and 3 children are full time residents, we run 6 full time boats out of our lodge, may-sept. half of our employs are made up of local people, the majority of what we take in goes back into the local economy.

Proposal 83. I fully support this proposal. In recent years we have had king salman limits all up and down through the season. 2 a day to 0 , this is not productive to running a buisness ,selling the unkown. last season was a prime example, it started off with one a day for non residents , 4 anually. 3 dailey for residents. By aug. 1, it was 0 for non residents , 1 a day for residents. That quota could have bean stretched out a lot more.

1 a day for non residents 3 anual is were id like to see it go back to. the front end of the seson is most important because of lack of silver salmon , and as recent years have shown this can go on as far as mid july, but king salmon remain important to clients throughout the season .

stabilaty is what we are all asking for , we dont need a ton of extra fish on a high abundance year and get hamerred with closers on a low abudance year, proposal 83 is the best option for us at the moment. there has to be a happy medium somewhere. Stabilaty please ! on this issue.

proposals 226 and 227 I fully support both. Once again i have bean fishing these waters for 35 years, i have a boat in the water year around, no other charter or sport boat covers more ground than me and my boats. the dsr fishing is as good now as it was 30 years ago. one fish a day for dsr was over managment 3 years ago, to take it to 0 is crazy. There is not a resorce problem on the west side of prince of wales island...

Now i cant speek for other areas , but if there truly is a concern i would hope the f&g would adress those areas of concern and not just close evrything down. if the state is concerned about yelloweye rockfish, (once again i see no problem from a sportfishing point of view) they could seperate yelloweye from the rest of the dsr.

i here concerns of the charter industy growing larger. this is not posable. the feds stopped growth when they they put a cap on halibut partisapation. there are only so many permits out there ,if you want to get into the idustry you have to get an existing permit. its pretty simple math..

thank you for your time

kirk agnitsch/sure strike lodge

surestrikecharters@aptalaska.net

907-826-3909

Submitted By
Klinton Chambers
Submitted On
12/22/2021 7:12:57 AM
Affiliation



PC210
1 of 1

My name is Klinton Chambers, owner/operator of Haybucker Charters LLC operating out of Sitka, Alaska for nearly two decades and I support Proposal 83. As a charter captain and commercial troller, Proposal 83 would provide consistency to the King Salmon fishing done from my boat by clients during the charter season and myself when commercial trolling. Having the opportunity to fish for king salmon is a dream for most of my clients and presents a major draw for them to visit Sitka. When they visit Sitka, not only do they spend time on my boat with me fishing for salmon, they also frequent local businesses including lodging, restaurants, and local shops. Past in season king closures have led to clients trying to book earlier and earlier charter trips in order to be guaranteed the opportunity to fish for king salmon. With clear and consistent king salmon allocation, I will be better able to attract and keep clients. Additionally, as a full time resident of Sitka, I also support keeping resident access open. Thank you for reading and considering my input.



Phone: 907-486-6555

Fax: 907-486-4105

www.kraa.org

To: Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

December 21, 2021

RE: Southeast and Yakutat Finfish and Shellfish, January 4-15, 2022
Opposition to Proposals 101 and 103

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) requests that the Alaska Board of Fisheries reject those proposals at the Southeast and Yakutat Finfish and Shellfish Board Meeting that intend to cripple the salmon enhancement programs in Southeast Alaska and, by implication, all of the State of Alaska.

Proposals 101 and 103 are functionally equivalent to the proposals (49-53) heard at the December Prince William Sound (PWS) Board meeting in Cordova. Once again, the same proposer forces all stakeholders in the regulatory process—Board members, ADF&G, Board support staff, fishery participants, hatchery operators as well as the general public—to spend significant time and resources responding to ideas that are repetitive and that have been previously rejected by the Board. As mentioned in December, the Board may be better off vetting all of these types of proposals, state-wide, at a single meeting in March of each year.

The language used and accusations levied by the author of proposal 101 imply “flip-flopping” and dereliction of duty by the Department, “strong arming” by the enhancement representatives on the Regional Planning Teams, and generally a mis-managed system for enhancement programs and production. I challenge these statements. The regulatory and review framework for permitting of salmon enhancement in the state of Alaska sets an incredibly high standard for approval. Furthermore, there ARE measures in place and often conditions placed on permits that require monitoring, assessment, and evaluation of the returns related to new production or release areas. If needed, the review process by the RPTs will require, through recommendation to the Commissioner, production and management changes to improve projects and modify past practices.

Proposal 103 targets the Southeastern Alaska Area Enhanced Salmon Allocation Plan. (SAAESAP) This plan encompasses the three primary aquaculture associations in Southeast Alaska and seeks to address harvest allocations of returning hatchery salmon amongst three different commercial salmon gear types. Any changes to the Plan, especially by the Board of Fisheries, would need to be vetted by the stakeholders and the Department to assess overall impacts and unintended consequences.



The vetting process for change to the SAAESAP occurs annually when the plan is reviewed by the Southeast Alaska Allocation Task Force for Enhanced Salmon. Recommendations of the task force, such as issues related to time in area and hatchery production are then forwarded to the Regional Planning Team for Southeast Alaska. This process is complex and detailed and has implications not just for commercial salmon permit holders but for all salmon user groups in Southeast. Proposal 103 would add research requirements, arbitrary limits, and unspecified reductions on hatchery production based on an as-yet-to-be-determined stray rate. KRAA believes that the existing structure should be used to address all of these concerns and evaluate whether or not they merit change.

In summary, the proposals 101 and 103 targeting hatcheries in Southeast are no more workable or coherent than those that targeted hatcheries in Prince William Sound. Please reject these proposals just as you rejected the parallel proposals Prince William Sound's hatchery program.

Finally, KRAA would encourage Board members to continue your discussions regarding new protocols for hatchery related proposals. We believe that hatchery proposals should be taken up at a single meeting of the Board, perhaps the state-wide meeting in March. Hatchery proposals could be reviewed annually, on an every-other year basis, or once every three years. The current system has allowed an abuse of process with repetitive proposals using up the Board's time and resources. When the Hatchery Committee meets in March, current scientific information regarding Alaska's hatchery program is presented and the Board is informed regarding scientific updates and programmatic developments. It would seem more efficient for the Board to review and consider hatchery related proposals at the same time.

Thank you for the opportunity to submit these comments.

A handwritten signature in blue ink, appearing to read "Tina Fairbanks".

Tina Fairbanks
Executive Director

Submitted By
Korry Harvey
Submitted On
11/22/2021 8:56:06 AM
Affiliation



PC212
1 of 1

I am a resident of Bellingham, WA, and former resident of Anchorage, AK. I am writing to express my full support for the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast. Specifically, I support proposals 156, 157, 158. The food chain being what it is, herring protection ripples through the seas to affect several other species, notably endangered salmon and orcas which are dependent on healthy herring stocks. This decision holds considerable consequences all the way to the Salish Sea. Thank you for working to protect these natural treasures.

Submitted By
Kristine Fulton
Submitted On
12/21/2021 1:16:26 PM
Affiliation



PC213
1 of 1

Dear Alaska Department of Fish and Game,

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come."

Gunalchéesh for adding your voice to this important issue!



Submitted By
Kurt Whitehead
Submitted On
12/22/2021 4:31:11 PM
Affiliation

Phone
9077385000
Email
kurtjw99@yahoo.com
Address
PO Box 388
Klawock, Alaska 99925

Chair Carlson Van Dort and Members of the Board,

Thank you for your service.

My wife and I are year round, full time, real Alaskan residents that operate a small charter fishing lodge in Klawock, AK and contribute heavily to the local economy.

I fully support proposal 83. The last few years the king salmon annual bag limit for guided non residents have fluctuated between 0 and 4 depending on the month/week.

This unstable management approach to our king salmon bag limits makes it very difficult for the charter industry to book clients and keep them when we don't know from one week/month to the next if the king season will be open and if we have bag limits. We are more than willing to give up the increased bag limits in high abundance years and/or June for stability. This is the main reason I support prop 83. The vast majority of the charter industry would be happy to have a 28", 1/day, 3 annual in June, 1/day, 2/annual in July and 1/day 1 annual in August.

The charter fishing industry needs stability! Emergency closures/openers are not stable. They work in commercial fishing but they do not work in charter fishing. When the bag limit is high it creates greed in our clients and is counter productive to stability. We don't want/need excessive fish in June and then have no fish in August.

In prop 81, it proposes to allow charters to catch the excess fish after Sept. 1. This doesn't work for the majority of us because most of us are done fishing by then. The charter fishing industry seeks stability.

In prop 226 and 227, I am in full support and helped write both of them because the only rockfish that ADFG has conservation concerns with is the Yelloweye rockfish.

On the W side of PoW, Kuiu and Baranof there are so many rockfish (both pelagic and non-pelagic) that if you get within 10' of the bottom anywhere out there you'll likely catch a Quillback rockfish and if you get anywhere near structure you'll catch 13 different species. I target these species on a daily basis because they are fun for clients, taste great and make great memories. I assure you there are plenty of every species, including yelloweye.

A good solution would be to place yelloweye in their own bag limit so they are not lumped in with the other prolific, non pelagic species. Many resident local users are also unhappy they cannot harvest the other non pelagic species. ADFG has zero conservation concerns with all the other great eating non pelagic fish.

I am opposed to having our clients leave with more than 100lbs of fish per angler for many reasons but there is no reason they shouldn't be able to catch and eat a Copper rockfish, Canary rockfish, Quillback rockfish, etc.

The vast majority of the charter fishing lodge owners are full time Alaska residents that all contribute mightily to our local economies, take fewer fish out of the resource than any other commercial gear group and bring more money into the economy than any other gear group per fish.

For example, one king salmon has a value of about \$1000 to a charter lodge owner and that same fish has a value of \$100/\$200 to a troller.

If charter clients catch all of their daily limit of king salmon from June 15-August 15, a one boat operation such as mine with four anglers/day that fish every day can catch 240 total kings.

Operations like mine that don't fish every day due to our turnaround days will catch even less.

The charter fishing sector has remained stable and or decreased in all of SE AK since 2011 due to the Charter Halibut Permitting allocation process.

From ADFG's numbers:

There were 879 registered (licensed) saltwater charter vessels on all of SE AK in 2005.

In 2019 there were 783.

In 2020 there were 561.

Of these registered saltwater charters, the number that were active were:

738 in 2005, 653 in 2019 and 423 in 2020.



There is a narrative that the charter industry is growing and out of control but that is totally false. The Charter Halibut Permitting process has taken care of our growth.

What does continue to grow substantially are the unguided non resident boats that are pressuring our resources, the local users and the charter industry.

Their growth is driven by the irregularity in the Halibut regs. Unguided non residents can retain 2 fish of any size and the guided non residents (charters) have an unstable and fluctuating bag limit of 1 fish per day. If all non resident anglers had the same bag limits we wouldn't see this continuing growth in the unguided anglers.

If this board/ADFG would require an identification sticker on unguided non resident angler's boats it would result in better enforcement, better information and more informed locals.

Enforcement and the locals could easily identify boats.

Charter boats already have the large Green Bay Packers charter decal and our industry has been stable and/or declining since 2005 and we are heavily regulated, almost to the point of going out of business. We are not the problem.

More and more charter operations are realizing how valuable our resources are and we are limiting our clients to 100lbs each and placing more emphasis on the quality/experience than the numbers caught and poundage at the airport scale.

Thank you,

Kurt Whitehead - Treasure Hunter Lodge

Submitted By
Kylee Jones
Submitted On
12/20/2021 4:03:07 PM
Affiliation



PC215
1 of 1

I am a born and raised Alaskan. My family (myself and two children) and I depend greatly on the endless resources the forest and ocean provide. I believe it is important that I stand up for these resources to protect the future of my children, and the children of every Alaskan.

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Submitted By
La quen náay Medicine Crow
Submitted On
12/22/2021 10:43:48 PM
Affiliation
on my own behalf



PC216
1 of 1

To the State of Alaska Board of Fish: I write today in honor of my father, William "Bill" Cheney, who served for years until his retirement as a policy analyst for the Board of Fish, as well as a biologist for ADF&G, and as a State Magistrate. He shared with me many times that the most detrimental problems with state management plans for our fisheries was the assumption that a balance could be struck between commercial and subsistence harvest for fish stocks and the belief that western knowledge and science was better than Native knowledge and science. He shared with me many times over his informed scientific finding that subsistence must be the first priority, and all others uses after, because inherent in subsistence is thousands of years old management practices for abundance and that management practice when excuted clearly serves all Alaskans into the future. I write in SUPPORT OF PROPOSALS 156,157, and 158. These proposals lead to safer and better management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest. I am OPPOSED TO PROPOSALS 159, 160, 161, 163, 164, 165, 166, which lack merit, lack both western and Native scientific justification, disrespect subsistence users as well as Tlingit knowledge, and run the risk of further damaging and reducing an already jeopardized herring population. The Board of Fish in respectful government to government consultation, collaboration, and co-management with the Sitka Tribe of Alaska should work together to advance a plan to restore the abundance of the herring population in Sitka Sound for today and for future generations to come. Gunalchéesh, Háw'aa, Thank you, La quen náay Medicine Crow of Keex Kwaan (Kake).

Submitted By
Lakota Harden
Submitted On
12/22/2021 10:15:48 AM
Affiliation
Sitka grandmother



PC217
1 of 1

Phone
510-827-7689
Email
tasinaskawin@yahoo.com
Address
132 Indian River Rd
Apt D
Sitka , Alaska 99835

I am writing today because I believe the measures for protecting our waters, specifically the Herring has not been effective and it is crucial to make better decisions that focus on Herring replenishment and their longevity, and not profits for people. I support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, and run the risk of further damaging and reducing herring populations. S Also, the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance. I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. The comments in favor of limiting the harvest over years have seemed to go unheard!! Please listen to the testimony of thousands who care only about the Herring and not of those who care only on monetary profit. Herring is the source of the food chain and needs to be protected. A few seasons of limiting their harvest would make a big difference in allowing the Herring population to replenish, hence the salmon, whale and other wildlife to replenish. Thank you for for considering protecting the Herring!! Lakota Harden Sitka, Alaska 99835

Submitted By
Lance Preston
Submitted On
12/18/2021 4:51:48 PM
Affiliation



PC218
1 of 2

Phone
19077520461
Email
fvseaboyslance@yahoo.com
Address
2013 Cascade Creek Rd.
Sitka, Alaska 99835

Madam Chair Marit Carlson-Van Dort and members of the Alaska State Board of Fisheries,

Thank you for the opportunity to comment. My name is Lance Preston and I have been the owner and skipper of commercial salmon trollers in Southeast Alaska for exactly 20 years. I arrived in Sitka as a college student looking for summer work in 1993 and have participated in every July 1 king salmon troll opener since. After working on several commercial fishing boats learning the trade, I bought my own boat and permit in 2001. I have managed to make what I consider a prosperous living exclusively as a salmon troller, but it has taken a lot of discipline, and a lot of luck. In 2013 I was elected to the Board of Directors of Seafood Producer's Cooperative where I still serve its nearly 400 fisherman owner-members. I'm a resident of Sitka.

I am thankful to have participated all these years in a well-managed fishery. I have always been impressed by the sheer quantity of fisheries data being gathered from me in particular and my fleet in general. For countless years the Department of Fish and Game has known exactly how many king salmon I'm catching, where I'm catching them and even how many hours of effort on average it takes for me to catch them. The limited geographical areas I'm allowed to fish are patrolled by law enforcement. My kings are measured to an eighth of an inch. In international/interstate negotiations over the Pacific Salmon Treaty my fleet-mates and I have endured deep cuts in Chinook catches, time after time, in the name of conservation. Since 2018, in our efforts to rebuild Stocks of Concern in Southeast Alaska, we've had to sacrifice what was to me and many a major component of a troller's annual income, namely the productive weeks of March and April at the tail end of the directed winter troll fishery. That one hurt, but it's worthwhile to try and rebuild those stocks. It would hurt more to be a part of a mismanaged fishery.

Unfortunately, I'm legitimately concerned that the guided, and increasingly unguided, tourism fishing industry isn't being held to the same standards of conservation and accountability. Their catches never have been counted with anywhere near the degree of accuracy as (other) commercial catches, and the rapidly expanding bare boat sector isn't required to report their catches at all. A limited number of commercial troll permits were issued by the state for good reason, but the guided and bare boat tourism sport sector is expanding rapidly and unchecked. Too often this tourism-based fleet is fishing the very same corridors the commercial fleet has reluctantly abandoned to rebuild Stocks of Concern.

The Department is painstaking in the management of the commercial troll fishery, and admirably precise in its data gathering from this sector, down to the individual king salmon, but the impacts on the very same resource made for years and decades by the tourism fishing industry have not been accounted for carefully or scientifically. Commonsense reporting protocols and laws are lacking. There has been a failure to acknowledge the rise of another commercial fishery in our midst, and while it's miscategorized as "sport," the longer-standing commercial fisheries have borne the burdens of stringent management and conservation. Without a great deal more accountability for their harvests, i.e., accurate, enforced, catch reporting, I'm afraid the commercial tourism fishery is on a trajectory to put increasing competitive pressure not only on regional fish resources, not only on resident anglers and commercial trollers, but also on themselves. They should be given an opportunity to more meaningfully share stewardship of the resource and participate in scientific management at the level other commercial fisheries do. Until that time, and until the impacts of their fishery are better accounted for and understood, I will oppose proposals that can encourage their under-managed expansion.

Prop 83, opposed. The tourist industry fisheries are too under-managed and unaccountable.

Prop 88, opposed. The tourist industry fisheries are too under-managed and unaccountable.

Prop 225, opposed. This reallocates resources to an under-managed sector.

Prop 144, support. This proposal would help remedy the lack of accountability in an under-managed sector.

Prop 87, support. The actions suggested in this proposal, if pursued, would lead to better, more accountable management of king salmon.

Prop 101 and 103, opposed. These proposals add an unnecessary layer of management to the production of hatchery salmon which have historically been of enormous value to the troll fleet. ADFG's involvement with this production has been sufficient and admirable.

Finally, concerning ADFG's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. I support option 1, the status quo, for the troll fleet. The areas that would be restricted under options 2 and 3 would close most of the remaining openers that are

available for trollers to access Alaska hatchery produced king salmon in any significant numbers since the current po...
was implemented in 2018. After losing winter king opportunity in late March and April, this fishery has been an increa...
contribution to many trollers' annual income. There are no significant harvests of the SOC's in these fisheries.



PC218
2 of 2

Again, thank you for the opportunity to comment.

Submitted By
Larisa Manewal
Submitted On
10/9/2021 5:15:58 PM
Affiliation



PC219
1 of 1

Dear Southeast Board of Fisheries-

The Sitka Sac Roe fishery in its current state is very worrisome. Looking beyond the temporary economic gains of the fishery, the community will feel the long-term negative economic impacts if overfished in many different ways.

As a keystone species, other fisheries, like trolling, rely on a healthy herring population. Having participated in the troll fishery, I recall regularly finding whole herring in coho guts.

Tourism also depends on a balanced ecosystem, whether people come to sport fish or witness Humpback whales and other marine mammals supported by a robust herring population.

Most fisheries in Southeast Alaska are well managed, having learned from the East Coast collapse of many species. The sac roe herring fishery is an exception as it is inherently wasteful, inefficient at exclusively capturing the targeted mature females, and inadvertently supports fish farming industries that Alaskans have outlawed.

Born and raised in Sitka and spending most of my life in the region, I appreciate herring's inherent cultural and community importance. It is hard to put a monetary value on that, as it is simply a vital part of living here. As a friend put it, "the herring fishery is taking food out of our mouths," as his Tlingit way of life and this once-abundant food source becomes challenged by scarcity. Other communities that have lost their herring stock are now relying on the annual return to Sitka Sound as well.

History indicates that miscalculation in the abundance of biomass has led to a significant regional decline. Historical photos from the Alaska State Archives show Gastineau Channel once covered in herring. Predators like Humpback whales are rebounding, but the somewhat recent disappearance in Juneau is attributed to seine herring fisheries into the 1980s. There is still no evidence of any significant rebound. Spatial constriction and herring loss are familiar across Southeast Alaska, making Sitka one of the last places with any sizable return.

Short of a five-year moratorium, which has successfully replenished other species, I urge the board to support herring proposals 156, 157, 158 and oppose proposals 159, 160, 161, 162, 163, 164, 165 to protect this remarkable species for future generations and the overall health of our ecosystem.

Thank you for your time,

Larisa Manewal

Submitted By
Larry and Gail Taylor
Submitted On
12/14/2021 1:14:33 PM
Affiliation
Sport Fisher

Phone
907-538-7707
Email
larryinalaska@gmail.com
Address
PO Box 8142
Ketchikan, Alaska 99901

Dear Board of Fish,

Now more than ever, it is direr that we protect our Fish, lands, and way of life. Regardless of whether we are Native, we must recognize the importance of Herring to the ecosystem and the devastation to the world if we continue to allow the SAC Roe to destroy our resources for the sake of a dollar bill. You must do the right thing and end these technics that have no consideration or respect for our way of life and our world.

I support Proposals 156, 157, and 158, which lead to safer management of the commercial herring fisheries in Sitka Sound by developing better protecting population resilience. These represent thoughtful and actionable ways to make the current management paradigm less harmful.

I am 75 years old and have been in Alaska since 1967, and Gail has been here since she was two years old. I lived in Sitka for sixteen years, watched the sac row fishery, and saw the herring spawning on kelp in Sitka Sound. When it was thick with Herring, the Sound was very active with economic activity, spotter planes zooming all over the place watching for schools of Herring. Then I heard about the jiant Herring they used to have at Halibut Cove across from Homer, and how the three canneries there decimated that giant variety. Those Herring are not around any more. They dissapeared. I don't think we know how many herring it takes to sustain a population, but there must be a tipping point, below which it is not possible for them to survive.

I strongly oppose Proposals 159, 160, 161, 163, 164, and 165, which lack reasonable scientific justifications, disrespects subsistence users and modern and traditional Tlingit Knowledge, and run the risk of further damage and reduction to the herring populations, which would devastate life as we know it in and out of the water.

I believe it is time for The Board of Fish to work with the tribes throughout Alaska because none of these proposals, even those I support, go far enough to protect our resources, land and advance respectful stewardship of our water and land. Since time immemorial, the indigenous people have been stewards of their lands and deserve our respect.

Next, I would request you address the following with the same respect and attention; Ketchikan for years has been considered Urban, per lower 48 or board standards, leaving our Indigenous community members without Subsistence rights.

I fully support

93, 142, 146, 147, 148, 170, 234. With the following requests by the Tribal Governments.

King salmon is considered a precious resource to all tribal members throughout Alaska. However, these Fish are threatened year after year with low escapement in many of our rivers. Therefore, it is imperative to have in writing to prioritize tribal members to have access to this valuable resource by setting a cap on the annual harvest of king salmon by nonresident sports fishermen regardless of the status of the fishery.

The Board of Fish and the Alaska Department of Fish and Game can still set a limit lower than the established cap by emergency order, but the harvest shall not exceed the cap.

Ooligan Fish is a widely traditional food of the Native community, and this should be honored and protected. I strongly support regular and traditional harvesting of Ooligan by resident use. However, I do not endorse or support commercial harvesting of Ooligan, and The Board of Fish should remove all regulations supporting commercial fishing of Ooligan from the fishing regulations.

146 Nonresident harvesting of coho, sockeye, pink, and chum gives a general provision for seasons, bag, possession, annual, and size limits in the Southeast Alaska Area.

Establishing limits for nonresidents to 16 inches or longer, and 5 of each species per day and only 10 of each species in possession for visiting sports fishermen, is a great start. However, it does not go far enough to protect tribal citizens, and Alaska residents who depend on subsistence and personal use in this time of financial instability and a rise in living costs throughout the state. Additionally, with the decrease in seafood abundance due to Sac Roes' devastation to Herring, which in turn has devastated our Coho, Sockeye, Pink, and Chum Salmon, we need to protect Alaskans who are impacted the most.



The Indigenous people of the Ketchikan Indian Community have been using all beach resources throughout southeast Alaska since time immemorial. These include but are not limited to clams, cockles, seaweed, gumboots, sea asparagus, and sea cucumbers. In any indigenous household, you can find a number of these resources at any given time. These resources are part of the identity of traditional users. Therefore, we find it appropriate to have all such beach seafood to be classified as customary and traditional resources.

I also support 234 requiring season reporting by nonresidents as to their fish harvest and believe annual limit status of all species should be a priority. The keeping of these records has been severely miss managed and is a data deficient in past years. This data is important to the management of future population estimates of our waters fish and seafood abundance and distribution.

We have a responsibility to our community members to make sure that our resources are protected and solvent for generations to come.

Over the last 25-35 years the people of the Southeast, have fought to protect our land and water from the devastations seen in other parts of the world and the lower 48. It is time the board of fish stop ignoring what the Sac Roe fishery has done to other parts of the world.

Populations of Fish are critical to human food security regardless of where you live and in serious decline worldwide. In the last four decades, some fish have declined by close to 75%, which in turn impacts other marine mammals such as Whales, seals, otters, birds, reptiles, wolves, bears, eagles, basically all living things. I could go on because the bottom line here is that Herring is the Bees of the Sea, and like their sister the Bee they feed and pollinate our food sources all around us.

We can not become dependent on commercial Grocery stores, and processed foods.

Who are we kidding, we all live on subsistence, and without herring, there will be no food, except chemically designed garbage.

If you believe in the idea of freedom, the freedom to live off the land, eat healthily, and what God designed for us to eat, it is up to us to protect the BEES of the SEA, our Herring.

Submitted By
Laura Baldwin
Submitted On
12/17/2021 6:29:21 AM
Affiliation



PC221
1 of 1

I strongly support the three proposals by the Sitka Tribe of Alaska - proposals 156, 157, 158. These proposals are designed to incorporate specific elements of traditional ecological knowledge into the management of the commercial herring fishery in Sitka Sound and will foster herring abundance, which will benefit everybody in the long run.

I strongly oppose proposals 159, 160, 161, 163, 164, 165, by sac roe seine permit holders and the herring seine lobby group the Southeast Herring Conservation Alliance. These proposals will lead to destructive high-grading and the renewed decimation of local stocks in the bays and inlets up and down the coast, and mark the industry's desire to expand the scope of their permits to fully capitalize on the emerging abundance of herring in Sitka and beyond.

I believe that none of these proposals go far enough to affirm the fact of massive depletion of herring in the last century by commercial overfishing. This pattern has been devastating for indigenous people and coastal communities up and down the coast. The people of Southeast Alaska have been very clear for the last century in asking for an end to wasteful and destructive herring seining practices. This time of market failure for the fishery offers an ideal opportunity to take serious steps to foster abundance of herring populations up and down the coast of Baranof Island. We want wild abundance and shared prosperity for all creatures who depend on herring - not a parasitic commercial fishery.

Submitted By
Laurel Stark
Submitted On
12/21/2021 11:02:14 AM
Affiliation



PC222
1 of 1

Dear Board of Fish:

Thank you for the opportunity to submit comments.

Please support proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack appropriate scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. Please engage with traditional ecological knowledge in your decision-making processes.

Thank you.

Submitted By
Lauren Marie Cusimano
Submitted On
12/22/2021 3:56:33 PM
Affiliation



PC223
1 of 1

I support of herring proposals 156, 157, and 158.

I oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
Lawrence Demmert
Submitted On
12/22/2021 4:04:11 PM
Affiliation



PC224
1 of 1

Proposal 167:Designate Salisbury Sound as a Spawn on kelp fishery area. Salisbury Sound should be opened to Northern SE Spawn on kelp fishery as it is just over 11 milea from Hoonah Sound.

The last time there was a Sac Roe fishery in Salisbury Sound was the last time Hoonah Sound was open to spawn on kelp. The Sac Roe fishery hasn't used its full quota for years and rarely fishes Salisbury. This would be a great help to the Nse spawn on kelp fishery which has been closed and would ease the great hardship experienced by spawn on kelp fishers, which many are from the Sitka area and many are Natives.

Submitted By
Leah Canfield
Submitted On
12/22/2021 4:43:01 PM
Affiliation



PC225
1 of 1

Phone
9076177727
Email
perryandleah@gmail.com
Address
2013 2nd ave
Ketchikan, Alaska 99901

I am a resident of Ketchikan, originally from north Alaska in Wales, and love the sea, food, and all that Southeast Alaska has to offer.

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come.

Submitted By
Leah Mason
Submitted On
11/16/2021 6:40:27 PM
Affiliation



PC226
1 of 1

Phone
9077520101
Email
nosam.m.hael@gmail.com
Address
101 Rands Drive
Sitka, Alaska 99835

I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast. Proposals 156, 157, 158 are compromises that are very reasonable responses to existing interests in profiting from this very important species.

I would go further to say that it seems reasonable for those purporting to manage this resource to invest time and effort in a repopulation initiative in the many former sites where herring have been 'managed' out of existence.

Please show some humility in the face of a stark history of failure to manage these stocks. Please recognize the long-term success of the Alaska native people in securing abundance for all.

Thanks and Gunalcheesh for considering my request.

Leah Mason

Submitted By
Lee House
Submitted On
1/15/2021 8:42:15 AM
Affiliation



PC227
1 of 2

Drawing from past Board of Fisheries meetings, it is clear that it would be difficult if not impossible to have a typical in-person meeting while also adhering to state and federal Covid-19 safety recommendations. This creates an unacceptable margin of risk for our communities and specifically the host community of Ketchikan. With that, I am requesting that the Board of Fisheries Meeting scheduled in Ketchikan in April 2021 be postponed until it is clear that the meeting can be held safely.

If the Board of Fisheries meeting is moved to a virtual venue, it is critical that it be carefully crafted to be inclusive and accessible. Over the last year, there have been many examples of virtual testimony and hearings leaving important voices to be heard out of the process by way of technology barriers and connectivity issues. If the meetings move to virtual, I request that a clear and transparent effort be made to be as inclusive as possible with a focus on accessibility, fairness, and equity.

Thank you for your consideration.

Submitted By
Lee House
Submitted On
12/22/2021 8:55:55 AM
Affiliation



PC227
2 of 2

Phone
978-609-1249
Email
lhhouse.j@gmail.com
Address
707 Lake St
Apt B
Sitka, Alaska 99835

Dear Alaska Board of Fisheries,

I am writing today as a resident of Sitka and a herring roe-on-branch subsistence harvester. I support proposals 156, 157, and 158. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience. Given the history of herring management areas throughout southeast Alaska that are now closed, I believe we should be making safe, conservative, and sustainable decisions with the herring population of Sitka Sound.

I regularly hear the remark that *the herring population is doing great after the last couple of years without a fishery being held*, and that that is good enough reason to oppose proposals 156, 157, and 158 "because the numbers are great and we don't have a conservation issue." The part of this rationale that confuses and concerns me is that it seems like not having a fishery in the past years was beneficial to the herring populations, so shouldn't that be an indicator that we should be more conservative in our fishery decision making? Proposals 156, 157, and 158 are great ways to do that. They are responsive to the herring population and adjust accordingly to lower the Sitka Sound Guideline Harvest Level at times of low abundance (156) and avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population (157 & 158).

Proposal 159, 160, and 161 are disappointing to see, and are a direct and unapologetic affront to the way of life associated with harvesting herring roe on branches. ADF&G data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users. To me, **these proposals reek of systemic racism.**

Proposals 159, 160, 161, 163, 164, and 165, and 166 lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Still, I believe that none of these proposals goes far enough to advance respectful stewardship and protect wild abundance for generations to come.

I believe that intact herring populations mean better fed salmon, whales, eagles, halibut, seals, and so many other things that are key drivers in the tourist economy of our community. More importantly, intact herring populations mean stable harvests of herring eggs, which is a critical food source to many in this region culturally, spiritually, and historically. Tlingit ecological knowledge indicates that the herring populations in Sitka Sound are in decline. Tribal Citizens have been vocal about this decline for over thirty years, specifically with concern towards the commercial Sitka Sac Roe Herring Fishery.

Thank you,
Lee House



From: [Leonard Revet](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Hatchery rearing
Date: Thursday, December 16, 2021 6:36:14 PM

Hello: I have proposed this several times and have not received any reply. I'll try one more time: I have worked in the fish hatchery at the university of Washington in Seattle, which reared King among other Pacific Salmon and Stealhead. This was back in the 1950-1960 period. I worked at the hatchery at Kitoi Bay on Afognak Island one winter and several summers, both in the hatchery and marking smolts as they made their way to the sea. The Kitoi Bay project was to start a Red Salmon migration from Frazer Lake on Kodiak Island and was successful.

There is no question that hatchery reared Salmon ids have a higher rate of survival than natural reared do. The Kenai River is a sad situation for King Salmon and this has been true for a long enough period of time to make it clear that the population is on a decline and even with a very limited catch per person it continues it's decline. The populations of King Salmon seems to be on the decline where ever they occur, one's I am familiar with, the Kuskokwim and Yukon Rivers, as well as SE Alaska are also on decline. The Kaslioff River has been producing an excellent return with an impute of caught King Salmon of the Hatchery Reared Fish.

I have lived on the Kenai River twice, 1979-1982 and 2016-present and see a very large change in the population, a obvious decline in King Salmon and healthy populations of Red and Silvers. It seems only logical that hatchery reared Kings would have the best chance of increasing the King Salmon population. I will not take this any further if no reply is received, Leonard "Bud" Revet



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Submitted By
Linda Danner
Submitted On
12/13/2021 7:45:20 PM
Affiliation



PC229
1 of 1

Phone
8082177866
Email
lsdanner@yahoo.com
Address
Box 1313
Sitka, Alaska 99835

No on p83.Sport and guided fishermen are... 1. Not limited in numbers. 2. Do not help support hatcheries. 3. Had representation at Pacific Salmon Treaty that make the rules. 4. Are increasing in numbers of vessels participating. 5. Their season is getting longer. 6. The resource is diminishing. 7. They are largely non residents. We don't need and should not allow any more pressure on this diminishing resource. Often the airport is stuffed with boxes stuffed with fish. Often this resource is wasted or resold to pay for the Alaskan sport fishing experience. Let's protect king salmon as the Pacific Salmon Treaty intended. Not redistribute them to some gear group that sees an opportunity to do so.

Submitted By
Linda Lewis
Submitted On
12/22/2021 2:09:19 PM
Affiliation
Shelter Cove Lodge



PC230
1 of 1

Phone
541-953-8310
Email
sheltercovelodge@hotmail.com
Address
PO Box 5758
Ketchikan, Alaska 99901

Hello,

I am Linda Lewis (Creighton), proprietor of Shelter Cove Lodge in Craig, Alaska, a family run lodge for 23 years. Our son, David Creighton, and his wife and three children run the lodge and are year round residents of Craig. Our lodge runs 8 boats, employs 5 full time employees and approximately 32 employees during our lodge season June through August. Many of our summer employees are college students who depend on summer lodge wages to help finance their next year of college.

We are proud of our business and its success, hosting between 500 and 600 guests each season. We are also proud of the contributions the lodge and its guests bring to the City of Craig, the State of Alaska, and local businesses. Our guests purchase round trip tickets on our local air carrier, purchase gifts/souvenirs to take home, and enjoy a beverage from our local supplier. In addition, they pay a 5% sales tax on their trip and purchases as well as a local bed tax. Our business distributes money all year to Craig's local stores for tackle, fuel, equipment and supplies. Our local boat shop owner expressed that the charter industry accounts for close to 50% of his gross annual revenue and without the charter fleet, it would no longer pencil out for him to operate in Craig. Please also keep in mind that our clients alone contributed over \$40K in fishing license and stamps in 2019.

Proposition 82

We are strongly opposed to Proposition 82 as written. With a regulation set that allows for a 1 daily/1 annual limit of kings for a non-resident as of June 16, our business will not be able to book people in the time-slot from June 16 until early or mid-July when the silver run becomes available. A one or two king annual limit is not sufficient to sustain a lodge business that operates a 3 day package as do most of the lodges in SE Alaska. We will have two choices: delay our lodge opening to mid-July or open the lodge in early June only to close or curtail operations for most of a month in mid-season. Neither choice is economically viable for the lodge or its employees. We have 23 years of experience operating Shelter Cove Lodge, have seen the allowable catch for most species diminish considerably, and strongly believe the limits outlined in Proposition 82 will destroy our business and other like businesses in SE Alaska. Please consider that a person visiting Alaska to fish for 3 days after June 15th will only be able to retain 1 king, 3 small halibut, 15 black bass and possibly 3 slope rock fish until the silver run begins. Would you spend \$5000 per person total including travel to accomplish this?

Proposition 83

We are in support of Proposition 83. We feel whole heartedly SEAGO has gone to the best effort to request an equitable solution for both gear groups. SEAGO has also examined and demonstrated historical data and ADFG&G assistance that Proposition 83 will pencil out to sustain the charter industry, impart very little impact on the troll fleet all while still accomplishing the necessary management of the species and compliance with the treaty. Proposition 83 also brings some consistency and predictability to our industry. Currently, we cannot guarantee our clients the product we are selling will even be available. It would be like an airline selling a non-refundable ticket with a 50/50 shot of the plane flying. If the charter industry in Alaska is forced to endure drastically reduced limits, cancellations will occur in large numbers and there will be no federal dollars to save butts this time. With short notice of regulation changes and large amounts of money spent well in advance to prepare for each season, not many operations will survive more than one season of minimal returns.

Proposals 84, 85, and 86

Resident priority to us is unnecessary. So far in history we can only recollect kings being shut down to residents late in the season. By this time, residents have all had ample opportunity to catch their kings. By the time the closures occur, most have moved on to collecting silvers and bottom fish.

Submitted By
Lindsay Johnson
Submitted On
12/22/2021 11:11:54 PM
Affiliation
FV Sika



PC231
1 of 2

Madam Chair Märit Carlson-Van Dort and members of the Alaska State Board of Fisheries,

Happy New Year to you all. My name is Lindsay Johnson. I grew up on Southeast Alaska seafood and am now a power troller with my family as crew. I regret not being able to participate in the Board process in person as my second child is due during this meeting. We all have our work cut out for us this week!

My major concerns are 1) that Alaska residents do not lose access to fishery resources to nonresident anglers and that 2) those resources, most notably king salmon, are allocated fairly among user groups for maximum sustainable yield based on the most complete information possible.

Thank you for counting my opinions on the following proposals and for your efforts towards prosperous fisheries for Alaskans into perpetuity.

Proposal 80- Support

Proposal 82- Support

Proposal 83- Strongly oppose

Proposal 84- Support

Proposal 85- Support

Proposal 92- Support

Proposal 96- Support

Proposal 101- Oppose

Proposal 103- Oppose

Proposal 110- Support

Proposal 144- Strongly support

Proposal 156- Support



Proposal 157- Support

Proposal 158- Support

Proposals 159-165- Oppose

Proposal 217- Support

Proposal 219- Support

Proposal 224- Support

Proposal 230- Support

Proposal 276- Support

Submitted By
Liz Landes
Submitted On
12/17/2021 4:07:13 AM
Affiliation



PC232
1 of 1

Phone
6309156444
Email
el.landes@att.net

Address
P.O. Box 433
Haines, Alaska 99827

It's culture. It's food. The herring are an essential part of our ecosystem, both marine and terrestrial. There's not much left uncorrupted in our land - let's give the oceans one chance to catch its breath and protect these fish.

Submitted By
Lorraine kelly
Submitted On
12/17/2021 5:05:59 PM
Affiliation

Phone
5092541318
Email
rylor@hotmail.com
Address
P.O. Box 442
Asotin, Washington 99402

I strongly oppose proposal 101.



PC233
1 of 1

Submitted By
Louis Holst
Submitted On
12/15/2021 4:19:23 PM
Affiliation



PC234
1 of 1

Phone
9077382391
Email
wildakseafood@gmail.com
Address
1400 Edgumbe Dr
Sitka, Alaska 99835

I support proposal 80. Individual gear groups must be responsible for their own overages. Making a different group pay back an overage is not acceptable.

I support proposal 81. Trollers are well equipped to harvest any remaining king salmon quota. By September, all other fisheries are done harvesting. Leaving kings unharvested puts us all in a poor situation at the next treaty negotiation. It's good for everybody, not just trollers.

I oppose proposal 83. I am a troller, and I have markets too. I cannot afford to lose my markets on low abundance seasons. Low abundance is a problem we all must bear the burden of. Giving my fish to another user group is not acceptable. We must all find a way to live within our quota! All user groups were represented at PST negotiations, and knew full well what we are up against. Why should their market be given priority over my market? The lodge and guided sport industry is growing and has no limits. They must grow within their own allocation, and NOT be allowed to grow at the expense of the troll sector.

I support proposal 89. With the historic low effort in the past several years, I feel that this proposal is a positive step towards profitability for the troll fleet. There are many latent troll permits that are currently not being fished. The retirement of vast amounts of aging wooden vessels coupled with the lack of new troll vessel construction has created a situation where many of these permits will never likely be able to be coupled to a viable troll vessel. Allowing permit stacking will bring some of these permits back into profitability. Also, I believe that this is an incredible opportunity for young fishers to enter the fishery. Young permit holders without boats could secure top paying crew jobs on troll vessels that are equipped to fish 6 lines. These young fishers could then learn the trade from experienced professional trollers, thus helping to insure the viable future of the troll fishery.

I support proposal 144. The growth of the rental boat industry has created a new, un-monitored user group. Management must get this data! A logbook program for these users must be implemented.

Submitted By
Lucy Harvey

Submitted On
11/17/2021 10:04:37 AM

Affiliation

My daughter is a Yale Alaska Fellow living and working in Sitka Alaska for Sitka Counseling this year.

Phone
301-357-0861

Email
lucyharvey2011@gmail.com

Address
3508 Inverness Drive
Chevy Chase, Maryland 20815



PC235
1 of 1

I support proposals 156, 157, and 158. The dangers of overfishing have been documented all over the world, see this study <https://academic.oup.com/icesjms/article/67/9/1830/621607>. Allowing the herring populations to rebuild will benefit everyone, including commercial fishermen. Please let the stocks replenish by conserving current herring populations so that we can guarantee future herring abundance. That way, everyone wins.

I oppose proposals 159, 160, 161, 163, 164, and 165 because they will not allow current herring populations to thrive and recover. Once the fish are gone, they may never come back. As we have learned all too well in other areas of Alaska.

Please take the prudent, safe course of action and protect the herring stocks today.

Respectfully submitted,

Lucy Harvey

Submitted By
Luke Whitethorn
Submitted On
12/14/2021 6:45:49 PM
Affiliation



PC236
1 of 1

Phone
9075180740
Email
MLwhitethorn@hotmail.com
Address
100 Odin lane
P.O. Box 1716
Petersburg , Alaska 99833

I Luke Whitethorn am a commercial Dungeness fisherman in southeast Ak for 33 years and would like to reject any dungeness closures in southeast Alaska! We have lost a lot of our grounds to sea otters and sport fishermen over the years I've been fishing and many of these areas are Not being used at there full potential as intended! Sport and personal use fisherman can fish crab all year around and we are restricted by season length due to harvest rate(in season management) I would also like to comment on the kasan area that I have fished for over 10 years and the closers of the Harris river was hard enough to swallow and now the new proposal at kasan to shut down more area would take over 50 percent of our fall harvest away from the few crabbers that fish there! We only get to fish kasan in the fall and sport and personal use crabbers get to fish all summer without any commercial crabbers fishing at all! Another kasan closer would be detrimental to the few commercial cravers that fish there in the fall! Thanks for your time!

Luke Whitethorn - FV Haakon

Submitted By
Lynn and Vince murray
Submitted On
12/16/2021 11:55:14 AM
Affiliation
None



PC237
1 of 1

Phone
2085961099
Email
lynnandvince@yahoo.com
Address
717 east first street
Moscow, Idaho 83943

Herring numbers have dropped dramatically over the past fifty years under the management of Alaska Department of Fish and Game. It is critical that we do something to reverse this trend before it is too late. Therefore, we support herring proposals 156, 157, and 158 (and oppose all other proposals) as simply a first step in this recovery process. Much more must be done, and we encourage all responsible parties to do just that—place herring recovery ahead of economic interests that disregard the importance of this species and its critical role in a stable ocean ecosystem in Southeast Alaska, an ecosystem upon which numerous other species depend.

Submitted By
Maegan Bolin
Submitted On
12/22/2021 7:15:56 PM
Affiliation



PC238
1 of 1

Hello! I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. You have the power and the responsibility to make a difference here. Make it known that you stand with and respect the wishes of indigenous people.

Submitted By
Mamie Williams
Submitted On
11/17/2021 1:17:20 AM
Affiliation



PC239
1 of 1

I am a Mamie Williams and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast "I support proposals 156, 157, 158." "We need to protect the herring to ensure the survival of Washington States critically endangered orcas. Our orcas depend upon Columbia River chinook salmon that rear in Southeast main food source is SE Alaskan herring. Please prioritize protecting the herring for future generations"

Submitted By
Marcus S Nelson
Submitted On
12/22/2021 7:46:21 PM
Affiliation



PC240
1 of 1

I am in favor of proposal 163 and 164. ive been in the fishery appx 12 years. i think it would make fishing easier not only for participants but also law enforcement and will be a safer better controlled fishery. less stress or pressure on ADFG. Ive been an Alaska resident all my life (62yrs) and am in support of thes two proposals.

Submitted By
Mark Holst
Submitted On
12/15/2021 5:42:09 PM
Affiliation



PC241
1 of 1

Phone
9077384920
Email
mholst4570@gmail.com
Address
1400 Edgumbe Dr
Sitka, Alaska 99835

I support proposal 80. Its unacceptable to me that certain gear groups have to give up fish due to other gear groups catching more than their allocation. we must all live within our means.

I support proposal 81. Its bad for all gear groups to have fish left uncaught. When negotiating the salmon treaty, what gives us the right to ask for more kings, or even just keep the kings we already have, when we don't even catch the fish we have. Why not catch any and all remaining fish?

I oppose proposal 83. We must all live within our means. Reallocating King salmon to a certain gear group at the expense of another is unacceptable, esecially on low abundance years. Low abundance years are a problem for everybody. Its unacceptable for other gear group markets to be filled at the expense of another market.

I support proposal 89. Permit stacking would create a whole new level of proffesionalism in the troll fleet. Not only allowing for proffesional trollers to move forward in the industry it would also create a new class of young fisherman looking to eventually own their own boat. If allowed, young fisherman could buy a troll permit and get a higher paying crew job on a proffesional troller. Not only earning a higher crew share, but also learning and gaining experience from experienced proffesionals.

I support proposal 92. Terminal harvest areas are designed to have a high percentage of hatchery kings, which are there for us to catch. Hatcheries already don't want small kings to spawn anyway, so why not catch them?

I support proposal 144. With a growing "non-guided" charter boat fleet we need to have adequate reporting laws and oversight put in place. Everyone else has oversight, why not them?

Submitted By
Martin J Fabry
Submitted On
12/17/2020 8:28:59 AM
Affiliation
Old People



PC242
1 of 1

Phone
19077552205
Email
skip44m@gmail.com
Address
6655 Big Salt Lake Rd,
Fisherman Alley
Prince of Wales Is. ALASKA, Alaska 99925

I would like to propose that the board of fish have this idea passed into law to support senior residents of the state. The proposal is;

Any resident holding a permanent fishing/hunting/trapping license may use two poles (year round) when fishing alone from a boat. This means no other person in the boat. It would be very easy to regulate and check for F & G Officers and it surely would help us seniors.

Please & thank you,

Martin J. Fabry

Klawock, Alaska

Submitted By
Martine Glaros
Submitted On
11/17/2021 4:17:11 AM
Affiliation



PC243
1 of 1

I strongly support proposals 156, 157 and 158. We need better protection for Orcas!

Submitted By
Mary A Stewart
Submitted On
12/16/2021 1:54:04 PM
Affiliation



PC244
1 of 1

Phone
5104141903
Email
hollandstewart@yahoo.com
Address
6285 Bernhard Ave.
Richmond, California 94805

We are writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

There used to be bountiful spawning herring populations throughout Southeast. But in the last 50 years, spawning grounds from Kah Shakes to Lynn Canal have collapsed under ADF&G management ... and not a single one has yet recovered. Herring are a keystone forage fish species and critical food for salmon, as well as other economically and culturally important species like humpback whales and harbor seals.

While the proposals being considered by BoF next month are not enough to undo the collapsed herring populations across Southeast, they are an important first step in protecting Sitka Sound's population — the last best herring spawning grounds in the region.

Therefore we are writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
MaryCait Dolan
Submitted On
11/16/2021 6:31:00 PM
Affiliation

Phone
2166503537
Email
mcaitdolan@gmail.com
Address
3231 Nowell Ave
Juneau, Alaska 99801



PC245
1 of 1

I support Sitka Tribe of Alaska's proposals 156, 157, and 158. Protect the herring.

Submitted By
Matt Lawrie
Submitted On
12/22/2021 6:49:58 PM
Affiliation

Phone
360 201 5595
Email
Matt.thusela@gmail.com
Address
505 Hirst Street
Sitka, Alaska 99835

I am a lifelong Alaska resident and a second generation commercial fisherman. I have been participating in the Southeast salmon troll fishery based out of Sitka for over 20 years. While I also participate in the Southeast pot shrimp fishery, the bulk of my livelihood comes from the summer troll fishery.

The troll fleet is the largest salmon fleet in Southeast. But it is a fleet that was built largely on the harvest of king salmon, and it is a fleet that has been dwindling for the last thirty years, as our access to king salmon has shrunk, and increased targeting of other species has failed to fully make up the difference. Last years summer troll fishery had the lowest participation on record, with just 63% of the permits fishing. Gross annual income has also shrunk, from an average of \$55,018 per permit fished in the first ten years in which data is available to an average of \$44,025 in the last ten years. Most recently, 2021 was a decent year for the troll fleet, with an exceptionally large chum harvest in the Sitka area, and strong prices across the board providing a bright spot for a fishery otherwise beset by strong headwinds.

I would like to see this march towards obsolescence halted and reversed. I would like to see trolling remain a viable career choice, and I would like to see the troll fleet continue to be a relevant contributor to the regions economy. There are a number of proposals before the board this meeting that will impact the future of the troll fleet. I am thankful for the opportunity to provide input on these proposals, and am hopeful that the needs of the troll fleet will be give equal footing with other user groups in the board process.

Proposal 80 seeks to address a situation that is likely to arise at some point under the current PST, where one or more user groups exceed their allocation of king salmon and cause Alaska to go over the PST all-gear catch limit. I **support Proposal 80** to the extent that guidance is clearly needed to deal with this eventuality. I would like to see language developed that 1.) Holds each group to their annual allocation with the exception of instances when one gear group needs to exceed their allocation in order for Alaska to maximize all-gear harvest, and 2.) Provides a payback provision that holds any group that exceeds its allocation (not withstanding the exception mentioned above) accountable for repayment the following year. I would also like to see domestic payback language that requires payback internally in the event that one gear group exceeds their allocation (again with the exception mentioned above) without resulting in an all-gear over harvest.

I **support proposal 82**, with the amendments recommended by the Sitka AC. As noted in their comments, the department is seeking clarification with this proposal on how the sport fleet is going to be managed to stay within their allocation under the new PST regime. I would like to see the use of in season management as has been used for the last two years, to keep the sport harvest within its annual allocation, rather than managing to attain a 20% average across years.

I **strongly oppose proposal 83**. While it is true, as the proposer states, that in the past the department managed commercial troll and sport to their 80/20 allocation over time rather than annually, that was possible due to the absence of the payback provisions that are now part of the PST. The payback provisions put an end to the possibility of averaging over multiple years within the PST arena. Now SEAGO wants to move that averaging into the domestic management arena, taking from the troll fleet in years of low abundance, and maybe returning those fish in years of high abundance.

While it is a virtual certainty that the guided sport fleet will exceed the sport allocation in years of low abundance with the tiered bag limits proposed in 83, it is far from clear that those fish will be paid back in years of high abundance. With the continual growth in the sport fish industry it is easy to envision a scenario whereby a succession of overages in low abundance years results in an inability for the sport industry to repay the debt as an ever larger fleet continues to harvest at or near their allocation even in years of high abundance, resulting in a defacto reallocation of king salmon from one sector to another.

I submitted and **support proposal 89**. I submitted it with the goal of increasing the economic potential available to individuals currently or potentially participating in the SE salmon troll fishery, while maintaining or reducing overall fleet capacity. This proposal seeks to achieve this goal by providing an individual with the ability to fish six troll wires instead of four south of Cape Spencer during periods of chinook non-retention if they hold two SE power troll permits (permit stacking), or allowing two permit holders to fish 6 lines on one boat (dual permit). This theoretically would allow an individual or a duo to catch marginally more fish - all else being equal - than an individual with a single permit. However, by requiring the use of two permits, the cumulative gear available to fish shrinks from eight to six lines for every two permits used in this manner.

While I hope and expect that established trollers will take advantage of this proposal should it pass, I also foresee this proposal benefiting deckhands and others trying to get into the fishery. In comparison to the expenses associated with purchasing a boat capable of effectively participating in the troll fishery, a power troll permit is quite affordable, especially with credit as readily available as it currently is. Being



able to team up with an existing operation and negotiate a larger percentage as a permit holder offers a stepping stone into the fishery and would allow a new permit holder to build equity while avoiding the complications and expenses of boat ownership.

I have been making a living primarily in the troll fishery for over twenty years. A look at the CFEC earnings data, however, reveals that there are very few trollers grossing enough in this fishery to take a salary above the poverty level after expenses. One reason for this is low abundance and reduced access to king salmon. Another reason is the diversity of the fleet. Many, if not most who participate in the troll fishery do so as part of a diversified income strategy, supplemented by other fisheries or income from unrelated activity. This is great. Trolling allows permit holders to participate in varying degrees more readily than most fisheries. With low permit prices, the ability to use anything from a converted sport boat to a limit seiner and beyond, and nearly year-round fishing opportunities, the fishery attracts all sorts.

What this proposal seeks to do is allow those who want to make a living trolling, rather than treating it as a supplemental fishery or tax shelter, to more easily do so by gaining some small amount of increased efficiency for the modest expense of an additional troll permit. By not allowing six lines during chinook retention periods, and by holding the door open to anyone who wants to buy in, I believe this proposal offers that option without undue negative impact on those who chose not to participate. And by requiring the use of two permits to achieve six lines, I believe this proposal can avoid any real negative impact on inter-gear group coho allocation.

Proposal 91- I support the thrust of this proposal. I am not sure that this is the most efficient way to get the intended result, but I agree that there is a need for a more flexible summer king salmon management plan that would avoid overly short august openings in years of low abundance, while also catching the entire troll allocation.

I am not so concerned with the proposers worry that, in years of low abundance, there will be too few kings remaining to accurately manage the august king opening. But I do agree that August openings that last less than four days, when combined with the mandatory fair start coho closure prior to the opening, create an unnecessary loss in prime coho opportunity for the fleet and a real burden on processing and ice capacity. In order to make it worth the coho time lost with the mandatory fair start closure and the obligatory turn around time at the end of the king opening, four days of king fishing seems the bare minimum.

I support proposal 115 for the reasons outlined in the ATAs comments.

Proposals 171-174 all propose to change the opening date for the Southeast pot shrimp fishery in region A. I am **supportive** of this notion, though I am not sure which of these proposals or set of dates is the most reasonable. From a purely selfish point of view, a May 15 start date conflicts with the open access lingcod dinglbar fishery, which opens May 16th.



To: Alaska Board of Fisheries

On the Board of Fish Meeting and Covid

12/22/21

Dear Board Members,

I am taking this time to respectfully comment on the Board's decision to carry on having the 2022 January BOF meeting during a raging pandemic. The meeting is to be in a City that is rated a Hot Zone, in a venue with inadequate room for social distancing, and with an inadequate ventilation system. This list of conditions is contrary to all the Covid advice from the CDC, the WHO, and from Alaska's Chief Medical Officer Dr. Ann Zink. The CDC is also currently recommending against all travel.

As a fisherman who's over 70 with comorbidities I feel the BOF is giving me the choice of protecting my livelihood or protecting my health. With the choices offered I can't do both.

Yours

Matthew Donohoe



List of Proposals and my positions

Proposal: 80 Support

Proposal: 82 Oppose Subsection (g) (2). Also support Inseason Management not Averaging over years

Proposal: 83 Oppose

Proposals: 84, 85, 86 Support

Proposal: 88, Oppose

Proposal: 94 Support

Proposal 115 Support

Proposal: 125 Opposed

Proposal: 128 Opposed

Proposal: 135 Opposed

Proposal: 139 Opposed

Proposal: 140 Opposed

Proposal: 141 Opposed

Proposals: 145, 146, 147, 148 Opposed

RC6: Northern SE Stocks of Concern

Support option A Status quo for trollers

RC7: Stikine and Andrews Creek Stock of concern

Support option A Status quo for trollers



Proposal 82: Concerns

In the ADF&G Proposal 82, Staff Comments under, "What would be the effect if the Proposal is adopted" is this language:

"The department seeks the boards clarification on the use of inseason management to annually achieve the sport allocation under all management tiers, without modification of (b)(1) conflicting guidance remains on whether the department should manage the sport fishery to attain an average harvest of 20% of the annual harvest ceiling across years or annually manage to harvest 20% of the annual harvest ceiling."

My Comment:

If ADF&G Staff is asking here whether or not Sport Division can average overages in a single season or over a period of years the answer has already been settled in the 2019 PST Agreement.

Because ADF&G, the President and Vice President of SEAGO, and the rest of **the 2019 Alaska "Treaty Team" agreed to no accumulation of harvest underages but an annual "Pay Back" for any overages AVERAGING IS OFF THE TABLE.**

The Department, since 2019, is already managing inseason to the allocation and so far is doing a fair job. As electronic filing of sport harvest improves underages should be reduced but because of the 2019 Treaty Pay-back Clause managers will never achieve 0 underages.

Matt Donohoe



PROPOSAL 83: Oppose

For Trollers **Proposal 83** is probably the most important proposal at the 2022 BOF. In Proposal 83 SEAGO (Southeast Alaska Guides Organization) seeks to “borrow” fish from trollers during low quota years and pay them back in high abundance years. If this passes Trollers will lose more fish.

Stocks of Concern (SOC) have been with us for four years. We anticipate SOC management to continue for at least 3 more years. At this BOF the Taku and the Stikine Chinook stocks are being declared SOC. In spite of this Sport Chinook harvest is still being allowed in the spring in Western Icy Straights (when SOC are running). Icy Straights is the main inside migration corridor for Taku Chinook. At the same time Sport is also harvesting SOC in Western Sumner Straights, the main migration corridor for Stikine Chinook.

- During the Pacific Salmon Treaty (PST) negotiations all gear groups were represented. All groups agreed to the new treaty. This includes the SEAGO President and Vice-President who were on the Northern Panel of the PST and were instrumental in developing the 2019 Agreement. Charters, like every other group, need to comply with the new regulations and manage within their allotted quota.
- The SEAK Troll fishery is high percentage Alaska resident (81% CFEC). Most SEAK charter skippers, lodge owners, and their clients are out of state residents.
- In the 2021 season, even though State Regs recommend an out-of-state annual bag limit at Tier 4 (the 2021 Tier) of three Chinook from March to July 1, the Department set the bag limit at 4. This made the SEAK sport harvest curve unsustainable at the Tier 4 level (37,879 fish). **Unlike in 2020 in March of 2021 SEAK Charter Lodges were claiming on line and in the media full bookings.** Because of the predictable resulting increase in sport (charter) harvest (which the Department for some reason didn't anticipate) ADF&G closed SEAK Out-of-State retention of Chinook (from August 1st to August 31st). Harvest reopened later but ended 944 sport kings short of their allocation.
- Trollers once Ocean fished kings 365 days a year. Now we have a reduced ocean fishery of around 20 days (in a good year). Trollers can also Winter fish in inside waters 150 days. Three years ago the winter fishery was 45 days longer. Because of SOC Trollers lost six weeks of Winter fishing. SOC has also greatly reduced Troll hatchery fishing time and area.
- **Meanwhile Sports (Charters) have enjoyed continual industry growth on a declining resource.** Unlike Commercial fishermen Charters have no limited entry. **It's time for Charters to experience sustainable fishing not limitless growth.**
- Changing the management plan during SOC with a lawsuit threatening sport and commercial harvest seems like a bad idea. The Treaty CPUE Model is still an experiment. Hopefully SOC management is temporary. A lot of things can change in the future but at this time **there is no King quota shortage for sports. There is just inadequate inseason management.**
 - March 3, 2021 ADF&G Commissioner Doug Vincent Lang (DVL) issued an Emergency Order creating a record (since SOC) (for spring) non-resident annual bag limit (4 King Salmon before Jun 15). This was above the sports King Salmon management plan level (5AAC 47.055) which recommends 3 fish until June 30 then going down to 2 Kings.



- Sport Division's reasoning for the extraordinary 4 fish annual limit was a Covid caused low sports effort. In March of 2021 lodges were already reporting high client demand. In 2018 and 2019 the low sport harvest was due to SOC management that closed inside waters until June 15. Covid was not a low demand issue until 2020.
- The Taku and the Stikine are declared SOC. A large spring Charter effort in Western Icy Straights, Yakobi Island (part of the Taku River corridor) is still occurring as it does around Noyes Island and in Western Sumner Straits (on the Stikine River corridor).
- Under SOC management (Years 2018, 2019, 2020, and 2021) Sports have not caught their quota. This is probably due to the SOC spring closures in inside waters (not Covid). These closures were agreed to at the 2017 Sitka BOF meeting in order to protect returning SOC.
- Until SOC management is lifted (which is not eminent), **if managed responsibly**, there is no shortage of King Salmon quota for sport fishing.
- **For 45 years Commercial Trollers have contributed 3% of their gross to local fishermen funded nonprofit hatchery salmon production.** SEAK Sport harvest benefits greatly from these hatcheries but doesn't support them financially. Since 2020 Sport has harvested over 330,000 SEAK hatchery raised Chinook at an average of 15,000 a year. Most of those king salmon were paid for by commercial fishermen.
- ADF&G creel sampling of sport harvest is limited in the Cross Sound, Icy Straights area (Taku corridor). Nor is there much (or any) non –resident sport harvest sampling in the Sumner Straight area which is on the SOC Stikine River corridor. There are no creel samples taken at private docks (Lodges) anywhere in SEAK. **If the Department is serious about SOC management the Department needs to know what stocks the Charter industry are harvesting.**
- **In the spring of 2021 on the Taku and Stikine Corridors there was a record (since SOC) annual out-of-state sports limit of 4 kings.** Meanwhile the commercial hatchery access troll fishery was severely restricted from historic levels. Both the Taku and Stikine Chinook are now SOC. Rather than setting a 2021 record annual out-of-state bag limit when SOC are present (Spring) ADF&G needs to do more creel samples. The origin of the non-resident sport harvested King Salmon (hatchery, wild, SOC) in these areas is largely unknown due to lack of creel and scale samples.
- PST mandated Stock Monitoring agreements with our Southern Treaty partners (B.C., the Pacific NW States) have never come to complete fruition. These southern folks need to take their share of PST agreements seriously. Alaska does. Alaska needs to demand that they do and that we get our fair share of our historic fishery and not just argue over the bread crumbs.
- Resident sport fish harvest is stable and they are not asking for more of the troll allocation.
- If Proposal 83 passes it would be a precedent saying that non-resident sports clients (Charters) take precedent over resident commercial fisheries.



Arguments in support of ATA's BOF Proposal 115

The 2019 Pacific Salmon Treaty (PST) specifies that a CPUE Model establishes the all gear SEAK Chinook allocation. ***“Estimated CPUE From the Winter Troll fishery in District 113 During statistical weeks 41- 48”*** (2019 PST Agreement, Appendix B to Annex IV, Chapter 3 pg.72).

- SEAK Chinook all gear harvest is based on the CPUE of Troll caught Chinook in Sitka Sound during ADF&G Statistical Weeks 41 to 48. Opening day of the Winter Troll fishery is October 11. **From 2001-2020 Oct 11 often falls in Week 42, not in Week 41.** In 2021, for instance, October 11 fell on the second day of Week 42.
- Starting the Winter Troll fishery on October 11 means the number of days in the CPUE Model varies from 46 to 53 (See Table). Proposal 115 suggests a constant number of days making a slightly longer fishing period. Standardization of days will eliminate a significant and unnecessary variable providing better data.
- From 2001-2020 **the Winter Troll season opened 8 out of 20 times in Week 42. Not in Week 41. A Week 41 opening was agreed to in the PST.**
- From 2001 to 2020 the CPUE model would have predicted the wrong Post Season A.I. 10 out of 20 times. **That's being wrong 50% of the time.** This is a problem when the point of the CPUE Model is to predict the correct Post Season A.I.
- Before SOC management the 10 year average Winter Troll harvest (2008 to 2017) was 41,798 Chinook/winter. Under SOC management Trollers lost 6 weeks of harvesting the year's most valuable fish during the winter's most productive time. In the three years from 2018 to 2020 the winter fishery averaged 13,381 Chinook. These numbers represent an average harvest reduction of 68%. This devastated the winter fishery and the participants which happen to be predominantly Alaskan Residents. The data also shows that SOC are more available in the spring than in the fall. An earlier opening is less of a problem for SOC than a later closure.
- Proposal 115 allows for a few more fishing days **at a time when SOC spawners are not an issue and conforms to the language of the PST while an Oct 11th opening does not.**



CONCLUSION

- **Proposal 115 restores a small part of lost lucrative Winter Troll access without causing gear group conflicts or threatening SOC. It aligns the Winter Troll season with the PST language and eliminates a significant CPUE Model variable.**

| Fishing year (Chinook accounting year) | SEAK CPUE | CPUE Quota Red=over Post Quota. Blue=under | Post season AI | Post quota | October 11 fell on Day and Week | Current ADF&G October 11 opening: Days fished (Week 41-48) | Proposal 115: Days fished Week 41-48 |
|---|-----------|--|-----------------------|------------|--|--|---|
| 2001 | 8.3 | 266,600 | 1.29 | 250,300 | Wed, 42 | 46 least | 56 |
| 2002 | 16.9 | 334,500 | 1.82 | 334,500 | Thurs, 41 | 52 | 56 |
| 2003 | 20.4 | 334,500 | 2.17 | 334,500 | Fri, 41 | 51 | 56 |
| 2004 | 8.0 | 266,600 | 2.06 | 334,500 | Sat, 41 | 50 | 56 |
| 2005 | 8.3 | 266,600 | 1.9 | 334,500 | Mon, 42 | 48 | 56 |
| 2006 | 10.3 | 334,500 | 1.73 | 266,600 | Tue, 42 | 47 | 56 |
| 2007 | 3.4 | 140,300 | 1.34 | 205,200 | Wed, 41 | 53 most | 56 |
| 2008 | 2.3 | 111,833 | 1.01 | 140,300 | Thurs, 41 | 52 | 56 |
| 2009 | 3.4 | 140,323 | 1.2 | 140,300 | Sat, 41 | 50 | 56 |
| 2010 | 4.3 | 205,165 | 1.31 | 205,200 | Sun, 42 | 49 | 56 |
| 2011 | 6.1 | 266,585 | 1.62 | 266,600 | Mon, 42 | 48 | 56 |
| 2012 | 4.7 | 205,200 | 1.24 | 205,200 | Tues, 42 | 47 | 56 |
| 2013 | 4.4 | 205,200 | 1.63 | 266,600 | Thurs, 41 | 52 | 56 |
| 2014 | 7.4 | 266,600 | 2.2 | 372,900 | Fri, 41 | 51 | 56 |
| 2015 | 13.2 | 334,500 | 1.95 | 334,500 | Sat, 41 | 50 | 56 |
| 2016 | 11.05 | 334,500 | 2.06 | 334,500 | Sun, 42 | 49 | 56 |
| 2017 | 4.18 | 205,500 | 1.31 | 205,200 | Tues, 42 | 47 | 56 |
| 2018 | 3.58 | 140,323 | 0.92 | 111,833 | Wed, 41 | 53 most | 56 |
| 2019 | 3.38 | 140,323 | 1.04 | 111,833 | Thurs, 41 | 52 | 56 |
| 2020 | 4.83 | 205,165 | 1.39 | 205,165 | Fri, 41 | 51 | 56 |

Submitted By
Matthew Hemenway
Submitted On
12/19/2021 10:38:16 AM
Affiliation
None



PC248
1 of 1

Thank you for allowing me the opportunity to comment on the changes being proposed. I am a life long resident of Southeast and an avid subsistence and sport hunter and fisherman. I make my living as a fulltime power troller.

Prop 82: I think this is a good proposal because local residents should have priority for the Chinook sport allocation quota. The growth of both guided and unguided nonresident sport fishing in Southeast has been explosive and unregulated. With the high level of nonresident pressure ADFG needs the the tools to make sure resident anglers get the opportunity to enjoy our King salmon.

Prop 83: This is a bad proposal. It is a blatant attempt to circumvent the negotiations that resulted in the 20/80 allocation. The proposal claims that it is not a reallocation because the Chinook "borrowed" from commercial fishermen will be "paid" back in high abundance years. However, we are in a low abundance cycle and at this point a high abundance year seems mythical. I feel it is unlikely that trollers would ever see the "borrowed" quota again.

Additionally I think this proposal is unfair because commercial fishermen have already made huge sacrifices to conserve stocks for the future. We gave up the best part of the winter season and all of the spring season. Meanwhile, salmon guiding and boat rentals are unregulated. If the sport industry can not stay within its allocation perhaps it is time to implement a limited entry system for guides.

Alaska power trollers are already being targeted by lawsuits from outside groups. This proposal would be a blow to the small boat fishermen that are important to Southeast's economy and culture. Proposal 83 is bad for the economy of Southeast Alaska. The vast majority of troll permit holders reside in Southeast. The same cannot be said for fishing lodge owners and guides. In my own lifetime I have seen my hometown of Elfin Cove change from a small village with a school and families who were invested in the future of Alaska change into a seasonal fishing camp with most the land bought up by wealthy nonresident lodge owners only interested in what they can ship out of Alaska during the summer.

Prop 89: I am against this proposal. I think it would encourage consolidation by bigger boats and increase fishing pressure on coho and Chinook stocks.

Props 101 and 103: I am against these proposal. These proposal would be highly detrimental towards commercial fishermen and the economy of Southeast Alaska. Enhanced salmon stocks have become a keystone of the coastal economy and provide opportunity for local fishermen to make a living.

Prop 144: I support this proposal because there has been explosive and unregulated growth in the boat rental industry. At the same time resident anglers have seen their opportunity to harvest non-pelagic rockfish completely removed. I have personally witnessed the "self-guided" boat rentals based out of Elfin Cove hammer the pinnacles and humps known for their yellow-eye rockfish day in and day out even after ADFG closed the season. In both Icy Straits and Cross Sound every productive halibut hump constantly has "self-guided" boats anchored up and fishing. Anecdotaly you can see massive stacks of 50 pound fish boxes being shipped out from the float plane dock in Elfin Cove daily. It is not uncommon to see an angler shipping out several hundred pounds of salmon and halibut fillets. This is far more fishi than even a very large Alaskan family can eat in a year. It makes you wonder what is happening to all this fish when it gets down south. Is it being sold to finance the trip? Is it being tossed in a dumpster once it gets freezer burnt? Given away after it is freezer burnt thereby decreasing the publics perception of the quality of Alaska seafood? No effort has yet been made to truly understand the impacts of this large fishery.

This proposal is necessary to begin to understand the impact that this massive increase in fishing effort iduring the last decade is having on fisheries that are already fully allocated. While this proposal so far only applies to halibut it is a step in the right direction.

Prop 156-158: I support these proposals by the Sitka Tribe. Herring are base of the food chain in Southeast. Maintaining strong herring populations is essential for maintaining strong salmon and ground-fish populations. Herring need to be managed conservatively because a collapse in herring equals a collapse in predator fish populations. Additionally, many previous herring fisheries in Southeast and through out the North Pacific have already collapsed.

Submitted By
Matthew Jackson
Submitted On
12/21/2021 4:03:19 PM
Affiliation



PC249
1 of 1

Phone
907-821-1412
Email
Jackson.mw08@gmail.com
Address
207 Brady St
Sitka, Alaska 99835

Dear Board of Fisheries,

I am a lifelong Alaskan, born in Ketchikan and living in Sitka since 2013. I am a subsistence fisherman and hunter who spends many weeks on the water every year.

As you know, the herring fishery in Sitka Sound has been contentious for decades. The several proposals before you fall into two camps. On the one hand, you have proposals 156, 157 and 158, proposed by STA, which seek slightly more conservative management that would particularly protect older, more fecund females. On the other hand you have proposals 159, 160, 161, 163, 165 which seek to reduce subsistence access, increase barriers, and expand the scope of the fishery.

When considering the herring fishery, it is just as important to consider what ADFG does not know as what it does know. ADFG has fairly complex understanding of the biomass and age class of the Sitka Sound Herring population going back to the 1970's, but that's about it. Questions around the impact sac roe seining has on the spatial/temporal distribution of spawning behavior, and therefore subsistence harvests, long-term historical population trends prior to 1970s, the importance of herring as a forage fish to other commercially and culturally important species such as chinook salmon, regional population and ecological dynamics, and what it would take to rehabilitate collapsed herring populations are all unknowns to ADFG. Luckily in Southeast Alaska we have a strong record of Traditional Ecological Knowledge that could fill this gap, but unfortunately so far the Board and ADFG has largely neglected to take advantage of this knowledge.

Two points are most important to me. First and foremost, it is critical to understand that 11 out of 13 other herring fisheries managed by ADFG since the 70's have collapsed all up and down the coast, from Dixon Entrance to Lynn Canal. Herring have thrived here for millennia, and in just 50 years ADFG has allowed them to be fished out of most of their range. Therefore, the management of Sitka Sound cannot go on as usual, it needs to be managed extremely conservatively, as it is the only hope to ever reestablish populations across the rest of Southeast Alaska.

Secondly, Traditional Ecological Knowledge tells us that the practice of making multiple test sets and then scooping up schools with the most fecund females is extremely ecologically disruptive to herring, because it is the oldest and most fertile females that initiate spawning behavior and therefore provide temporal and spatial stability to reproductive behavior that is critical to both the subsistence harvest and to herring reproduction itself. By selecting sets with the highest roe content immediately prior to the beginning of spawning, sac roe fisheries pose an extreme threat to herring populations and subsistence users who rely on them. These mature females should be returning to spawn for years to come, yet these are exactly the females who are selected by sac roe fisheries. Again, this dynamic inherent to sac roe fisheries is a reason for extreme conservatism.

It is for these two reasons that I support proposals 156, 157 and 158, because they would provide slightly more conservative management for the last big population of herring in Southeast Alaska, particularly the old, fecund females.

It is for the same reason that I oppose proposals 159 through 165, because they all move the fishery in the wrong direction, either eroding subsistence rights and protected areas, or expanding this already extremely risky and contentious fishery.

Sincerely, Matthew Jackson of Sitka AK

Submitted By
Matthew Kinney
Submitted On
12/22/2021 3:58:07 PM
Affiliation



PC250
1 of 1

First and foremost thank you for your time and commitment to helping structure our fisheries. My name is Matt Kinney, Ive been involved with commercial fisheries my entire life and am currently the captain and an owner of the herring vessel Hukilau which also takes part in many other fisheries in the state of alaska. Over the past few years weve watched the Sitka sac roe herring stock blossom into a truly monstorous biomass in which the commercial fleet barely scratches the surface of. Alaska Department of fish and game has done an incredible job with data collection and record since the inception of the fishery and have managed a successful biomass for half a century. We are now at the largest biological boom ever recorded within the sitka sac roe stock, yet even in times where herring are so abundant that us fishermen have to literally carve off corners and chunks of schools of fish to avoid catching too many, the propigation of misinformation has infected the public. People who have never used any sort of marine electronics or directional sounding devices will come forward and claim to know things that they do not. They will fill the room with colorful theories, unbacked by data collection, unbacked by science, which is something we use as a standard in modern times. People who spend less than 10 days a year out on the water in sport skiffs will claim to know it all, and try to convince everyone that the herring are gone. Activists have been hired and sponsored to spin the truth and tell you things that aren't true, many who aren't even from Alaska. No real skin in the game, just here to fight for a cause. I hope you can cut through the haze and understand that the careful data collection of the Alaska department of fish and game is what has built the beautiful biomass that we are privileged to make our livlihood. I dont believe there need to be any more restrictions on a system that is clearly working, and working very well at that.

I am writing to express support for proposals 159, 160, 161, and 233.

I would like to express opposition to proposals 156,157, 158, and 167

Thank you for your time.



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 salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is important because it supplies us food and provides days of good clean family fun.

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.

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,

Matthew Roys
akroys@gci.net
(907) 586-6264

Submitted By
Max Kritzer
Submitted On
12/21/2021 10:47:54 PM
Affiliation



PC252
1 of 1

I'm writing 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'm opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users, and run the risk of further damaging and reducing herring populations.

Submitted By
Maya Reda-Williams
Submitted On
12/19/2021 5:47:36 PM
Affiliation



PC253
1 of 1

I am writing today in support of proposals 156, 157, and 158.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

It is no secret that fish stocks can be depleted. It is no secret that they are being depleted and threatened. How is it that Alaska can be home to the most sustainable fisheries as well as some of the most exploitative fisheries, namely, the herring fishery happening in Sitka Sound outside my home town of Sitka? There can be, and there was, enough fish to be financially viable and support the subsistence gatherers that depend on this resource. Our ways of life in Alaska are a source of pride, which I am sure you share, but if we aren't smart and careful with how we are protecting those resources, jobs, and foods that give us pride, we'll lose that. Listen to the science, and listen to the communities. We want everyone to win, including the commercial interests, but we just need to work on that balance within the herring fishery, and my support of certain proposals and opposition of certain proposals reflect that. Protection, regulation, and sustainability are not dirty words meant to exclude and put people out of work. On the contrary, these efforts seek to allow people to work, to fish, and to teach their children how to do these jobs. But if the herring are all caught, then no one else can be a part of it, and what fun is that? What does that do for anyone? The story of the atlantic herring is one of caution, and we have an opportunity to fix the mistakes that happened across the ocean. We're tightly knit communities here in Alaska, and our foods and way of life are a huge part of that, which I know that you know. Fishing is a source of pride, gathering herring eggs is a source of pride, please don't allow that pride to vanish with the herring. This is so important, to people, to ecosystems, to jobs, and to our pride as Alaskans. If nothing else, this vote should be postponed until you can get an accurate depiction of the stocks in question as, to my knowledge, these has not been a full assessment since the 90's. It is incredibly irresponsible to be making these decisions without the accurate fish counts to support your decision. If anything, it makes more logical sense to be conservative now in the fishing approaches until the assessment can be done, and then, if appropriate, loosen things up then. You're scientists, be logical, be responsible, and think long term. You'll always make enough money, because your paycheck is dependent on there still being fish, not the extinction of fish. Act in your own self interest if anything, and protect the herring.

Proposal 156 should be supported because fishing pressure on herring has never been higher than it is right now and the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance.

Proposal 157 and 158 should be supported because of the growing consensus of the vast importance of older fish for population resilience. The Sitka Sound Sac Roe herring fishery is designed to select for older herring and the population age structure is precarious and vulnerable as a result. These proposals would avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population.

Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.

Proposal 159, 160, and 161 are offensive, baseless, bad faith proposals brought by an industry gear group (called "Southeast Herring Conservation Alliance") against indigenous people. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

I am opposed to Proposal 163 and 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed out fish in the water while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they purport to address.

I am opposed to both Proposal 165 and Proposal 166, which should not even be considered, given that they represent permit creep of a sort that has no precedent and has been discouraged by the CFEC in recent years. I am opposed to both of these measures to expand the scope of the G01A (Herring Roe, Purse Seine, Southeast) permits.

Proposals 159, 160, 161, 163, 164, and 165, and 166 lack good scientific justification, disrespect subsistence users, and run the risk of further damaging and reducing herring populations.

Submitted By
Megan Moody
Submitted On
12/19/2021 11:13:22 AM
Affiliation



PC254
1 of 1

Phone
6176008635
Email
Megan.Rahija.bush@gmail.com
Address
PO Box 564
Tenakee, Alaska 99841

Hello,

I'm writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166. Herring are the underpinning of so much marine life and we all depend on their protection. Thank you.

Submitted By
Mel Izard
Submitted On
12/22/2021 3:19:48 PM
Affiliation



PC255
1 of 1

I am in support of herring proposals 156, 157, and 158, and I oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
Melissa E Wechter
Submitted On
11/17/2021 7:37:39 PM
Affiliation

Phone
3604413411
Email
prechtl.melissa@gmail.com
Address
4100 taku blvd
Juneau, Alaska 99801

I support proposals 155,156,157 to protect herring to protect orcas!



Submitted By
Michael g Benson
Submitted On
11/16/2021 6:31:29 PM
Affiliation
Tribal Member

Phone
19073100129
Email
michael_benson99501@yahoo.com
Address
207 Muldoon rd
323
Anchorage, Alaska 99504



PC257
1 of 1

I support Sitka Tribe on all of it's efforts to Protect our way of life that has been here more than 12,000 years

Submitted By
Michael Kohan
Submitted On
12/22/2021 12:03:59 PM
Affiliation
Sitka Salmon Shares



PC258
1 of 1

Phone
9077230099
Email
michael.kohan@sitkasalmonshares.com
Address
216 Smith St. B
Sitka , Alaska 99835

RE: Southeast and Yakutat Finfish and Shellfish Proposals: 83 & 172

Dear ADFG Board of Fish members,

Founded in 2010, Sitka Salmon Shares is an innovative seafood company dedicated to providing a premier wild Alaska seafood experience for home cooks across the country, while supporting small-boat Alaskan fishermen and fishing communities. The company specializes in delivering premium-quality, responsibly-caught seafood to customers mostly in the Midwest, but increasingly nationwide, via an online seafood market. Sitka Salmon Shares has a seafood processing plant in Sitka, a distribution facility in Galesburg, Illinois, and a marketing and finance hub in Madison, Wisconsin. Our investors represent our commitment to community-based capital and include 22 fishermen-owners and growing. Our subscription-based model delivers ~4.5 lbs. of premium Alaska seafood monthly to the doorsteps of our community of subscribers.

Regarding proposal 83 and related proposals, king salmon is an important offering to our subscribers and a cornerstone to the economic viability of the local commercial troll fleet we support and depend on in Sitka. With close to 85% of the statewide commercial hand/power troll permits owned by Alaska residents, and just over 83% of the fleet represented by residents of Southeast Alaska, the troll fleet is truly connected to the king salmon resource in Southeast Alaska (CFEC accessed for 2021; S05B, S15B). Unfortunately, comparable residency information is not available for all user groups that participate in harvesting the resource. As the troll fleet faces economic challenges such as small fish sizes, decreased returns, and an ongoing lawsuit that could close the commercial troll fishery that could trigger a cascade of effects to the other commercial, charter, personal use and subsistence salmon resources, entertaining proposals that re-allocate the resource during low abundance years for other fisheries to absorb puts the viability of the fleet and our business in jeopardy. Accountability through in-season management is a welcomed improvement to the sport fishing sector and is something that the department should build off of and not eliminate going forward.

Regarding proposals 172 and related proposals, Sitka Salmon Shares depends on a good percentage of the Southeast Alaska spot shrimp pot fishery for our business and supports the proposal to move the fishery opener to a spring/summer season for not only districts 2 and 6, but all Southeast districts. The current structure of the management plan contradicts conservative management practices by facilitating a compounding scenario of harvesting in the reproductive season that results in decreased populations, localized pressure, and reduced shrimping seasons. We support previous comments by ADF&G staff that reference enhanced biological conservation and fishery management.

Thank you for your consideration of our comments.

Respectfully,

Sitka Salmon Shares



From: [Big Mike](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: King salmon management proposals 82 and 83
Date: Sunday, December 19, 2021 5:06:16 AM

Marit Carlson Van Dort, Chairman
Alaska Board of Fisheries
1255 W 8th Street
Juneau, AK 99811-5526

Chair Carlson-Van Dort and members of the Board:

**Hi my name is Michael
Leboki owner of Eagle
Charters and Lodge in Elfin
Cove, Alaska. We have
operated in the Icy Strait,
Cross Sound and the
coastal waters between
Cape Spencer and Cape
Cross for over 35 years.
Sportfishing in Elfin Cove is
my family's primary source**



of income. Along with my lodge, I own a personal residence there. We help support the local economy in Elfin Cove and in Juneau. We rent boat condos all year round to store boats in Juneau from local business owners. Our primary source of transportation for our clients to our lodge is Ward Air and Alaska Seaplanes. The maintenance on our fleet is performed by local marine shops in Juneau and our food, fuel, building materials and other supplies are also purchased from Juneau. We employ



citizens of Juneau to work at Elfin Cove and also in Juneau year-round. King Salmon are a very critical part of our operation and it's really what brings people to our lodge for fishing. I feel it is critical to keep this fishery open for the entire season because a lot of our clients base their decision on coming on whether they can keep a King Salmon or not. It is important in the first part of our season to have a non-resident annual limit of at least three kings.

I do not support proposal 82 because I feel that non-



residents will not have opportunities to keep King Salmon during low abundance years. Most of the time before people will book a trip at our lodge, they will ask about the King Salmon limits. Due to emergency shut downs of fishing King Salmon in August in the past where they had already purchased their King Salmon permits. If I cannot give them an answer they are reluctant to book. I feel that it's important to manage limits for non-residents and I think it's critical that residents have



**suitable and stable limits
year-round as well. I do
support proposal 83. I think
it would be better for
customers to have the
same limits year after year
in high abundance years as
well as low abundance
years. It could be
challenging to market our
business and keep people
traveling to our community
year after year with
unstable regulations. I
hope the board can find a
resolution to keep
sportfishing for King
Salmon open all season for
both residents and non-
residents. I feel that it will**



**bring great success to our
economy and our industry.**

Thank you,

Michael Leboki

**Owner and Captain Eagle
Charters Lodge in Elfin
Cove, Alaska**



From: [Elfin Cove Resort](#)
To: [DFG, BOF Comments \(DFG sponsored\); forrest@seagoalaska.org](#)
Subject: Fishery Proposal 82 and 83
Date: Wednesday, December 22, 2021 1:07:06 PM

Hi my name is Michael Legowski owner of Fishmasters Inn and Elfin Cove Resort in Elfin Cove, Alaska. We have operated in the Icy Strait, Cross Sound and the coastal waters between Cape Spencer and Cape Cross for 11 years and the previous owner fished since the early 70's. Sportfishing in Elfin Cove is my family's primary source of income. We help support the local economy in Elfin Cove and in Juneau. We rent boat condos all year round to store boats in Juneau from local business owners. Our primary source of transportation for our clients to our lodge is with Alaska Seaplanes. All maintenance, fuel, part, and supplies come from Juneau including food and other items needed for the lodge. King Salmon are a very critical part of our operation and it's really what brings people to our lodge for fishing. I feel it is critical to keep this fishery open for the entire season because a lot of our clients base their decision on coming on whether they can keep a King Salmon or not. It is important in the first part of our season to have a non-resident annual limit of at least three kings.

I do not support proposal 82 because I feel that non-residents will not have opportunities to keep King Salmon during low abundance years. Most of the time before people will book a trip at our lodge, they will ask about the King Salmon limits. Due to emergency shut downs of fishing King Salmon in August in the past where they had already purchased their King Salmon license. If I cannot give them an answer they are reluctant to book. I feel that it's important to manage limits for non-residents and I think it's critical that residents have suitable and stable limits year-round as well. I do support proposal 83. I think it would be better for customers to have the same limits year after year in high abundance years as well as low abundance years. It could be challenging to market our business and keep people traveling to our community year after year with unstable regulations. I hope the board can find a resolution to keep sportfishing for King Salmon open all season for both residents and non-residents. I feel that it will bring great success to our economy and our industry.

Best Fishing,

Michael Legowski

(907) 957-8103

Mike@ElfinCoveResort.com



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 Elfin Cove, Alaska, and I participate in the commercial and sport salmon fisheries of the Southeast region. I run 6 charter boats and a lodge. Salmon fishing provides income for my whole family and many others.

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,

Michael Legowski
fishmastersinn@gmail.com
(907) 957-8103

Submitted By
Michaela
Submitted On
12/22/2021 7:16:05 PM
Affiliation



PC261
1 of 1

Phone
9078309025
Email
michaela.goade@gmail.com
Address
PO Box 1204
Sitka, Alaska 99835

Hi, my name is Michaela Goade and I am a Caldecott Medalist and New York Times best-selling artist of books for children. The books I work on center Indigenous voices and predominantly focus on the environment and a shared sense of connection between all living things. This place – Lingít Aaní – is at the heart of the work I put out into the world, and like many other locals (Native and non-Native) from the region, this place is at the heart of our way of life. In fact, I am planning on writing and illustrating a book about herring. I grew up in Juneau and currently live in Sitka, and belong to the Lingít Kiks.ádi Clan. The women in our clan are called Herring Women, as respect for herring is foundational to our traditional values. My grandmother, Katherine Wanamaker, grew up in Sitka and her parents and grandparents did as well.

I am writing today in support of proposals 156, 157, and 158.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

Proposal 156 should be supported because fishing pressure on herring has never been greater than it is today and the high Guideline Harvest Levels of recent years have left this fishery vulnerable and continue to do so. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance.

Proposal 157 and 158 should be supported because of the growing consensus of the vast importance of older fish for population resilience. The Sitka Sound Sac Roe herring fishery is designed to select for older herring and the population age structure is precarious and vulnerable as a result. These proposals would avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population.

Proposals 156, 157 and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.

Proposal 159, 160, and 161 are offensive, baseless, bad faith proposals brought by an industry gear group (called "Southeast Herring Conservation Alliance") against Indigenous peoples. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

I am opposed to Proposal 163 and Proposal 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed out fish in the water while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they claim to address.

I am opposed to both Proposal 165 and Proposal 166, which should not even be considered, given that they represent permit creep of a sort that has NO precedent and has been discouraged by the CFEC in recent years. I am opposed to both of these measures to expand the scope of the G01A (Herring Roe, Purse Seine, Southeast) permits.

Proposals 159, 160, 161, 163, 164, and 165, and 166 lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. Tlingit knowledge IS science. Our ancestors have been stewarding this land for thousands of years.

All that said, I firmly believe that none of these proposals does enough. None of them go far enough to advance respectful stewardship and protect wild abundance for generations to come. It is all of our responsibility to ensure that this region has a future, that our children and grandchildren can live off the land.

Gunalchéesh,

Michaela Goade



Alaska Bd of Fisheries
Please distribute to each
Bd member and add to
the record.

Mike Berners
P.O. Box 210003
Nulke Bay, AK 99841
P.O. Box 14
Tenakee Springs, AK
99841
12/21/21
907-321-1186

Dear Board Members

I urge you to oppose proposal 202 which proposes to reduce or eliminate the area closed to commercial dungeny fishing near the community of Tenakee Springs.

This area was closed initially years ago to commercial crabbing because of severe commercial/personal use conflicts. Since that time it has provided crab to residents of Tenakee and other Alaska residents many which are local property owners. The area is large enough that users can spread out and usually catch crab. Size of area is appropriate for level of use. Use of this area by "Yacht Charters" is minimal if any. Commercial users have the entire remainder of Tenakee Inlet. Please keep this personal use sanctuary in place as it currently exists.

Thank you!
Mike Berners

Submitted By

Mike Sullivan

Submitted On

12/22/2021 4:45:28 PM

Affiliation

Owner operator of a charter fishing business



PC263
1 of 1

Hello board of fish, my name is Mike Sullivan and I am an owner operator of a charter fishing business here in Sitka, AK. I've been in operation for the last 10 years.

First of all, I support proposal 83. I'm a year round resident who relies on consistent king salmon regulations. Not only for my own personal use, but for my clients who are coming to town and supporting our local economy. Inconsistent king salmon regulations could cause cancellations and less bookings which will in turn lessen my revenue as well as the city's revenue.

All bookings create a revenue to various parts of our local economy. For example; bed tax, sales tax, fishing license, grocery store, liquor store, restaurants etc.

In season closures make it difficult to operate and keep repeat clients coming back for future trips.

Sitka is known for its king salmon. Being able to provide an opportunity to retain king salmon is paramount to southeast Alaska's fishing tourism.

Submitted By
Mike Warner
Submitted On
12/22/2021 3:26:24 PM
Affiliation



PC264
1 of 1

Phone
997-351-2978
Email
goochwarner@hotmail.com
Address
PO Box 18146
Coffman Cove, Alaska 99918

I am writing in firm opposition to Proposal 153 concerning closure of Log Jam Creek falls. This area has long been used as a fishing spot for summer run cohos for the residents of Coffman Cove. The closure was prompted by someone apparently concerned about fishing during low water conditions. ALL information presented, which was minimal, was anecdotal and NOT based in any sort of fact. The biologist present said there is ZERO biological justification for any concern or closure. Zero concern.

This area has been used so long, there are fishing signs located on the highway to point it out. And there is still ZERO biological concerns about the run.

Please disregard this proposal as unwarranted and not based in facts.

sincerely,

Mike Warner

Submitted By
Molly Emerson
Submitted On
12/22/2021 9:09:11 PM
Affiliation



PC265
1 of 1

Phone
9072098591
Email
molly.j.emerson@gmail.com
Address
10410 Dock Street
Juneau, Alaska 99801

Dear Board of Fish Members,

I am a member of the local Southeast AK community. I was raised in Juneau and am friends and family with many commercial fishermen in the region.

I urge the board to reject **any** proposals that re-allocate King Salmon quota to the charter industry and thereby reducing quota from the local commercial salmon fishing fleet. The commercial fishing fleet has operated for decades as a limited entry, permitted market. All of the stakeholders have paid into a system to ensure that the amount of harvesting boats is sustainable and controlled.

In contrast, entrance to the charter industry has been left intentionally uncapped, without requiring any permitted entry to the market. Therefore, the number of harvesting boats and stakeholders has dramatically grown over the recent years.

There are predictably now more charter boat stakeholders fighting for the same charter quota of King Salmon. This quota was agreed upon through lengthy negotiations in the U.S./Canada Pacific Salmon Treaty.

Just because there are more people fighting over a slice of pie does not mean they deserve another slice of pie. It instead shows we perhaps need a limited entry system of charter boats, just like all the other salmon fisheries here in Alaska.

Thank you for your consideration,

Molly Emerson

Submitted By
Nancy
Submitted On
11/4/2021 11:32:45 AM
Affiliation
Keen



PC266
1 of 1

Phone
907-500-8862
Email
ravenlady58@gmail.com
Address
PO Box 1055
Haines, Alaska 99827

I would like to submit a comment, regarding the Sitka Sac Roe Herring Fishery. I am an Alaskan Native woman, who depends on the Herring Traditional Harvest. We have been reliant on traditional use of herring, since time immemorial.

In over 60 years of mismanagement by the ADFG, we are seeing the evitable extinction of herring.

In our lifetimes. It is time to shelve the ego's, and genuinely engage in '**Traditional Ecological Knowledge.**' Herring is, and always will be 'a forage fish'.

I support proposal numbers : 156,157, and 158.

I **do not** support proposal numbers : 159,160.161,163,164, and 165.

Thank you for your time. Nancy Keen

Submitted By
Naomi Michalsen
Submitted On
12/22/2021 4:38:06 PM
Affiliation



PC267
1 of 1

Phone
907-617-1852
Email
njmichalsen@gmail.com
Address
87 Chacon Street
Ketchikan, Alaska 99901

As a Tlingit grandmother and mother of children whose father's family belongs to the Tlingit Kaagwaantaan of Sitka, we have been eating herring eggs and caring for this place, Tlingit aani, our entire lives.....and for as long as our Tlingit history can be remembered. This whole and nutritious food is not only good for our physical wellbeing and health but we also know that this powerful food is critical for our spiritual, emotional and mental health as well.

I want to make sure that our precious foods are protected from any harmful commercial fisheries practices today and in the future. I stand for those who come after us, our future generations. I want to make sure that our traditional foods will always be accessible to the Indigenous peoples of this land.

I strongly support proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska and strongly oppose proposals 159, 160, 161, 163, 164, and 165 submitted by the Sac-Roe Industry.

Thank you,

Naomi Michalsen

Submitted By
Natalie kilmer
Submitted On
12/22/2021 9:21:38 PM
Affiliation



PC268
1 of 1

Phone
4153417559
Email
Nataliejanekilmer@gmail.com
Address
905 sunset pl
Ojai, California 93023

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.

Thank you
Natalie

Submitted By
Natalie Watson
Submitted On
12/16/2021 11:28:00 AM
Affiliation



PC269
1 of 1

Phone
6174606338
Email
kwon.myong@gmail.com
Address
9350 Glacier Hwy
Juneau, Alaska 99801

I am writing out of concern about the decades-long collapse of herring in Southeast Alaska. This represents a failure of ADF&G to protect this crucial resource, one that has sustained human populations up and down the coast for millennia. Overfishing by commercial fleets have devastated the herring, and so far none have returned. We should be doing everything we can to protect the remaining herring and also trying to restore them, for the benefit of future Alaskans who may well need this resource to survive.

I am in support of herring proposals 156, 157, and 158. Proposal 156 will help protect the herring by reducing the fish available to the commercial fleet in extremely lean years. I am particularly concerned that the herring coming into Sitka Sound are protected so that this remaining population will not collapse.

I also want to make sure that subsistence harvesters can still gather and share herring eggs. Subsistence users are not responsible for this terrible loss and should not be punished. This is why I oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Thank you for protecting our precious resources.

Submitted By
Nathan Borson
Submitted On
12/17/2021 6:16:54 AM
Affiliation



PC270
1 of 1

I support a thriving herring stock, one that grows towards pre-historic abundance. I also support prioritizing proven, time-honored, sustainable subsistence use of this culturally-important resource over the commercial fisheries that have so depleted herring since they started. Therefore, I ask you to support proposals 156, 157, and 158, and I ask you to oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
Nathan White
Submitted On
2/17/2021 12:34:56 PM
Affiliation
Student



PC271
1 of 1

Proposal 172

I am against the proposal to move the shrimp fisheries from October to May. First of all, the vast majority of fisherman are occupied with other commercial fisheries. Secondly, the shrimp are soft and nasty after they lay their eggs. Thirdly, The tourists will not eat the shrimp if they are soft, but the tourists that come when the shrimp are firm and good will pay double what the other tourists pay for soft shrimp. Last but not least, people for this proposal will say that it will be worth it for the money, but we could change the tourist season to accommodate the better shrimp and advertise that to the tourists. These are all of the reasons that changing the commercial season is the wrong thing to do.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau Alaska 99802-1668



PC 272
1 of 3

November 10, 2021

Alaska Department of Fish and Game
Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Carlson-Van Dort:

The Alaska Region National Marine Fisheries Service wishes to provide the Alaska Board of Fisheries with the following information on one regulatory proposal for your consideration during the upcoming meeting in Ketchikan, Alaska that could impact State of Alaska and Federal fisheries participants. Please let us know if you have any questions concerning our letter.

Sincerely,

James W. Balsiger, PhD.

Administrator, Alaska Region





**Southeast and Yakutat Finfish and Shellfish
Interaction between Federal and State of Alaska Fisheries
Alaska Board of Fisheries Meeting – January 4 - 15, 2022
NMFS Comment (Proposal 232)**

Proposal 232: 5 AAC 28.1XX. Create new regulation to establish a pot fishery for spiny dogfish in Southeast (SE) Alaska.

Potential Issues:

- *Stock biomass is unknown in SE which may cause unintended overfishing.*
- *Directed fishing for spiny dogfish could increase bycatch of other commercially important species such as halibut, rockfish, and crab.*
- *Fishing disproportionately on immature sharks could lead to an unsustainable population.*
- *Females have an 18-24 month gestation period so directed fishing would overlap with reproduction regardless of the fishery timing.*

Proposal 232 seeks to create a pot fishery in SE Alaska for spiny dogfish. According to 5 AAC 28.105(a), the western boundary for the SE district of Alaska is 144° W. long. which would encompass federal reporting areas 659, 650, and part of 640. It is unclear in this proposal what the basis would be for the amount of the guideline harvest level (GHL). Under federal management, spiny dogfish are managed as part of the overall shark complex Gulf of Alaska (GOA) wide. Although spiny dogfish share an overall overfishing level (OFL) and acceptable biological catch (ABC) with other sharks, the stock assessment of the shark stock complex in the GOA does calculate a separate OFL and ABC for spiny dogfish. However, there is not a federal trawl survey in area 659 and biomass in that area is unknown and not included when determining the OFL or ABC for the shark complex. The stock assessment states that trawl survey catch of spiny dogfish in the rest of the GOA is highly variable from year to year resulting in no obvious trend in biomass estimates. This may indicate that they are easily missed during the survey due to both their migratory nature and their preference for near surface waters in the summer months. Spiny dogfish bycatch is unknown and unaccounted for in State salmon and groundfish fisheries because most state managed fisheries do not require observer coverage. Without reliable biomass estimates and with undocumented spiny dogfish bycatch in the State fisheries, a directed fishery could result in overfishing. In addition, because this species is highly mobile and moves between management areas, state-water's catch may potentially impact the entire GOA stock.

Directed fishing for spiny dogfish could increase bycatch of other important commercial species such as halibut, rockfish, and crab. Rockfish in particular are susceptible to high mortality rates. Rockfish have a closed swim bladder and quick changes in pressure that occur when rockfish are caught and brought to the surface damages their internal organs regardless of the gear being used. The extent of possible bycatch is unknown since there has not been directed fishing for spiny dogfish with pot gear and there is no federal observer data. In addition, it is unclear how pots might need to be modified to accommodate a spiny dogfish fishery and how those pots would then respond to bycatch of other species.



Spiny dogfish are a slow growing species with low fecundity and population stability likely depends on high survival rates to maturity. The stock assessment states that spiny dogfish are among the most vulnerable species in the GOA fishery management plan and would likely not withstand heavy fishing pressure. This proposal seeks the use of pot gear, which would allow them to target immature animals and release mature females. However, for long-lived, slow-growing species with low fecundity it is beneficial to the population for an individual to be allowed to reproduce at least once. If the majority of spiny dogfish removed from the stock are immature and have not yet reached an age to contribute offspring, the spiny dogfish population could decline as a whole.

Female spiny dogfish have an 18-24 month gestation period so if there were a directed fishery it would overlap with reproduction regardless of the fishery timing. This proposal suggests the use of pot gear, in part, to ensure that fecund females can be released unharmed. However, handling mortality of spiny dogfish is unknown and pot gear has not been tested for this species. It is possible that large mature females may enter the pot and become stuck in the tunnel opening or pot netting in the same way they get stuck in gill nets, causing death.

Background on the federal management of sharks in the GOA:

The shark complex in the GOA has been managed as a group since 2011. The OFL, ABC, and total allowable catch (TAC) for sharks in the GOA are recommended by the North Pacific Fishery Management Council and established by the Secretary of Commerce on a yearly basis. The TAC has been set equal to ABC since 2011. The OFLs, ABCs, and TACs are GOA wide and not further split out by area. Spiny dogfish are included in the shark complex. There is currently no directed fishing for any shark species in the GOA federal fisheries. The maximum retainable amount of sharks is 20%.



December 22, 2021

Sent via Electronic Mail

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

Alaska Board of Fisheries:

I am writing on behalf of Native Peoples Action, a statewide non-profit organization that strives to give voice to our ancestral imperative to uplift our peoples and our traditional ways of life by taking a stand, working together and mobilizing action. We do this through ensuring Alaska Natives are heard in all levels of policy making, by building stronger unity among Indigenous communities to collectively advocate for the wellness of our peoples and our ways of life, and by transforming social systems. I am also writing on behalf of myself, as a Native woman who grew up in southeast Alaska who grew up eating herring eggs, whose family has been sustained by the herring for thousands of years, who also continues to feed my children herring eggs, and hopes to continue our way of life for future generations.

NPA strongly supports proposals 156, 157, and 158 put forward by the Sitka Tribe that uplifts traditional knowledge in the management system. Indigenous traditional knowledge has been, for too long, ignored by our governing and decision-making bodies. Traditional knowledge has kept the herring thriving for thousands of years, traditional knowledge will keep them thriving for thousands more. NPA opposes proposals 159, 160, 161, 163, 164, and 165. We uplift the voices most impacted and join their concern that these proposals will lead to the decimation of local stocks.



Overfishing and over-utilization by certain permit holders is, unfortunately, not unique to the herring. We have seen and heard communities going hungry and losing traditional sources of protein because of powerful groups that have pitted their income against those who are filling their freezers and continuing on traditional and spiritual ways of life. We ask that the board of fish prioritize subsistence over the cash economies of commercial fisherman, and to please listen to those who are impacted most.

Gunalchéesh/Háw'aa/Quyana/Mahsi'/Baasee'/Maasee'/Dogedinh/Thank you,

Kendra Kloster
Executive Director
Native Peoples Action



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Sitka, Alaska, and I participate in the subsistence and sport salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is important to me as a food and recreation source.

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,

Neil Akana
npakana@hotmail.com
(907) 747-8960

Submitted By
Nellie Lipscomb
Submitted On
12/22/2021 3:47:00 PM
Affiliation



PC275
1 of 1

I am writing in support of Proposals 156, 157, and 158, as these initiatives are important developments towards more effectively and safely managing the commercial herring fishery in Sitka Sound by better protecting population resilience and doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166 due to their lack of strong, empirically-based scientific justification, notable disrespect for the rights of subsistence users, and disregard for the importance of implementing modern/traditional Tlingit knowledge in any management of this keystone species. These proposals portend significant risk of further damaging the already critically-vulnerable herring population, and contributing to the further marginalization of viable, vital Tlingit knowledge of our environment.

Further, I believe that none of these proposals are sufficiently proactive or strong enough to ensure respectful, ethical, and effective stewardship and protection for future generations of both herring and people.

Submitted By
Nels Wolf Lynch
Submitted On
12/21/2021 9:21:14 PM
Affiliation
Permit Owner



PC276
1 of 1

Phone
9077969281
Email
wolfnak13@gmail.com
Address
P.O. Box 425
Haines, Alaska 99827

Hello there,

My name is Nels Lynch and I am writing in to support proposal 163/164 for an equal split fishery for the Sitka Sac Roe Herring Fishery.

I've been involved in the fishery since 2009 when my father Ted Lynch handed the permit down to me, the same permit my grandfather Michael Lynch handed down to him. I am very fortunate to have been included in such a fishery and see the importance it has on our way of life in Alaska and the people involved with it. Being an Alaska Native commercial fisherman and continuing my ancestors legacy while suppoorting my young family has given me great purpose and pride in my own life.

It seems like the feast or famine mentality and commercial fishing go hand in hand but I feel the best sustainable apporoach for this fishery is when those involved can come together and make the most of the changing times. I believe the happy medium for those opposed and those involved with the Sitka fishery is an equal split fishery.

Thank you for your time and commitment.

Nels Lynch

Submitted By
Nicholas Galanin
Submitted On
12/10/2021 7:26:14 PM
Affiliation



PC277
1 of 1

Phone
9077381823
Email
galanin@gmail.com
Address
601 Versa Place
Sitka, Alaska 99835

I support proposals 156, 157 and 158 and strongly suggest that you do as well. We must protect the herring for future generations. I also oppose proposals 159,160,161,163,164,165.

Gunalchéesh

Submitted By
Nicole Marie Windhausen
Submitted On
12/16/2021 2:29:28 PM
Affiliation



PC278
1 of 1

Phone
3154147857
Email
nicole.marie.windhausen@gmail.com
Address
9
Bishop Drive
Fayetteville, New York 13066

I am writing today as a US citizen to express my support of herring proposals: 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Nicole Windhausen

Submitted By
Nina
Submitted On
12/22/2021 4:12:37 PM
Affiliation



PC279
1 of 1

Hello my name is Nina. Im native and I am writing today in support of proposals 156, 157, and 158.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

Proposal 156 should be supported because fishing pressure on herring has never been higher than it is right now and the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance.

Proposal 157 and 158 should be supported because of the growing consensus of the vast importance of older fish for population resilience. The Sitka Sound Sac Roe herring fishery is designed to select for older herring and the population age structure is precarious and vulnerable as a result. These proposals would avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population.

Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.

Proposal 159, 160, and 161 are offensive, baseless, bad faith proposals brought by an industry gear group (called "Southeast Herring Conservation Alliance") against indigenous people. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

I am opposed to Proposal 163 and 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed out fish in the water while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they purport to address.

I am opposed to both Proposal 165 and Proposal 166, which should not even be considered, given that they represent permit creep of a sort that has no precedent and has been discouraged by the CFEC in recent years. I am opposed to both of these measures to expand the scope of the G01A (Herring Roe, Purse Seine, Southeast) permits.

Proposals 159, 160, 161, 163, 164, and 165, and 166 lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Still, I believe that none of these proposals goes far enough to advance respectful stewardship and protect wild abundance for generations to come



North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603
npfahomer@gmail.com



PC280
1 of 1

December 21, 2021

RE: Alaska Board of Fisheries Southeast Finfish
Oppose Proposals 101 & 103

Dear Members of the Alaska Board of Fisheries,

The North Pacific Fisheries Association (NPFA) is a commercial fishing organization based in Homer, Alaska, representing more than 70 family fishing operations utilizing a variety of gear and vessel types. Our members participate in fisheries throughout Alaska, from Southeast to the Bering Sea, in both state and federal waters, and many participate in Prince William Sound (PWS) salmon fisheries. Benefits of the southeast salmon fisheries are felt throughout our community.

NPFA urges the Alaska Board of Fisheries to oppose Proposals 101 and 103 and continue to allow ADF&G biologists and managers to oversee the State of Alaska PNP Hatchery Program.

Proposals 101 and 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These changes would no doubt influence all hatchery programs through the micromanagement of hatchery operating plans by the Board of Fisheries. These proposals seek to reduce or limit hatchery production through direct action by the Alaska Board of Fisheries and would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

According to the McKinley Research Group, "Southeast hatcheries account for 2,000 jobs (annualized), \$90 million in labor income, and \$237 million in total annual output, including all multiplier effects." The hatchery harvests earned fishermen \$44 million on average annually. This significant economic impact in the region would be devastating to loss. Additionally, hatchery returns are targeted by ADF&G's prosecution of the fishery during years of low wild stock returns.

Alaska's hatchery operators recognize that there are periodically high levels of hatchery straying in some natural stream samples, but the overall fraction of enhanced salmon straying remains low. In 2012, to address questions of straying and a lack of scientific research directed specifically at pink and chum salmon, Alaska's hatchery operators came together with ADF&G and seafood processors to encourage unbiased investigation of hatchery strays and potential resulting hatchery impacts on wild stocks. As a result, the Alaska Hatchery Research Project (AHRP) is an ongoing project that seeks to quantify and assess pink and chum salmon straying in PWS and chum salmon in Southeast Alaska, guided by a series of research questions.

The ongoing research in this area will inform the board in future years. Significantly altering the hatchery program without the resulting information from this research would be short sighted. Again, NPFA asks that the Board oppose proposals 101 and 103.

Thank you for your service and consideration.
Sincerely,

Malcolm Milne



NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION

1308 Sawmill Creek Road
Sitka, Alaska 99835
Office: (907) 747-6850 fax: (907) 747-1470



PC281
1 of 1

December 22, 2021
Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov
RE: **Opposition to Proposals 100, 101 & 103**

Dear Chair Marit Carlson-Van Dort and Board of Fisheries Members,

Thank you for the opportunity to comment on Enhancement proposals submitted to the Alaska Board of Fisheries for the SE Alaska and Yakutat board of fish meeting.

I am the General Manager of The Northern Southeast Regional Aquaculture Association or better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement projects. My comments represent our 25 member board, and the fishermen they represent, made up of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and interested persons from our region. Our board has broad representation from our region and at our Fall November 18th, 2021, meeting, our 25 member board passed a **unanimous** resolution, with no abstentions, **strongly opposing** Enhancement proposals **101 and 103**. Additionally, our board passed a resolution **opposing** resolution **100** by a super majority of the board.

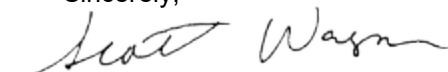
NSRAA **strongly** encourages the BOF to **oppose** proposals **101 and 103**. Proposals nearly identical to 101 and 103 were submitted for the November 2021 Prince William Sound meeting by the same proposer (Proposals 49-53). At the PWS BOF meeting there was overwhelming opposition to these proposals while the proposer provided no on-time comments, no public testimony and no additional information through deliberations. At the PWS BOF meeting proposal 49 was rejected 0-6 and proposals 50-53 had no action taken. NSRAA asks the board to reject or take no action, as was done at the PWS meeting in Cordova, on these proposals.

Proposals 101 and 103 are punitive in nature and do not attempt to address **any** allocation issue in the SE Alaska area. The proposals, whether intentional or not, would have tremendous financial impacts for ADFG and hatchery operators and result in a reduction and likely elimination of most enhanced salmon production in the region. Additionally, proposals **101 and 103** are **opposed by ADFG** as they are impractical and impossible to implement into management. The proposer behind **100 and 103**, has in the past, submitted proposals targeting a reduction in hatchery production that have not been adopted by the board of fish. These current proposals before you are the latest versions which take up tremendous time by ADFG and BOF staff, hatchery operators, processors, commercial salmon fishermen, and yourselves, the Alaska Board of Fisheries members.

NSRAA also opposes Proposal **100** which would remove gillnet as a legal gear for the SE Cove Terminal Harvest Area (THA). NSRAA supports retaining gillnet as a legal gear in this area to allow maximum flexibility to manage the Terminal Harvest Area common property fisheries through board direction and in consultation with ADFG. To date there has never been a commercial gillnet opening in the SE Cove THA.

Once again thank you for the opportunity to comment and thank you for the work you do on behalf of the subsistence, sport, personal use, and commercial fisheries of the state.

Sincerely,


Scott Wagner

Submitted By
Norval Nelson
Submitted On
12/22/2021 2:41:36 PM
Affiliation



PC282
1 of 1

Phone
907-723-5334
Email
norvalnelsonjr@gmail.com
Address
1625 Fritz Cove Road
Juneau, Alaska 99801

I am in support of SE Herring proposals 163 and 164.

I have benefitted as a herring seine tender and a hering seine fisher for over 35 years.

I have been a permit holder for over 10 years.

I have been concerned about the polttics which favors "western science" and overlooks traditional ecological knowledge which has been presented by Sitka Tribes of Alaska.

Both user groups want the same thing - that this species be managed in perpetuity for generations to come. A co-op system was implemented in 2020 and perfected as an equal share system in 2021. The equal share system in 2021 was very effective and achieved a safe fishery and management which benefitted both user groups - personal and commercial.

Submitted By
John Woodruff
Submitted On
12/22/2021 10:52:33 AM
Affiliation
OBI/Processor



PC283
1 of 3

Phone
12069705471
Email
john.woodruff@obiseafoods.com
Address
1100 W Ewing Street
PO Box 70739
Seattle, Washington 98119

Madame Chairman and Board members;

Please accept this as our written testimony for your upcoming Board meeting regarding Southeast proposals. OBI operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in the Alaska seafood processing business and sustainable salmon stocks are the single most important issue to our long term viability. We employ thousands of workers in Alaska, many locally based, and work with many hundreds of independent harvesters who are mostly State residents. We pay them tens of millions of dollars annually for their catches, much of which stays in their home communities. We also pay millions of dollars annually in State taxes that support local governments, law enforcement, schools, social programs, etc. We have always supported a science based management approach and will continue to do so. We know well the Alaska Department of Fish and Game is second to none in applying scientifically collected data to determine the optimal hatchery contribution toward insuring maximum sustainable yield.

I am writing to support the Alaska non-profit and private hatchery system that operates in Southeast Alaska. These hatchery organizations are; Northern Southeast Regional Aquaculture Corporation, Southern Southeast Regional Aquaculture Corporation, Douglas Island Pink and Chum, Inc., and Armstrong/Keta Inc. and they are an integral and key part of the Southeast Alaska salmon resource and management plan. Their work is exceptionally important to our company and to the coastal communities that dot Southeast Alaska.

We urge you to let the partnership that exists between ADF&G and the various hatchery organizations to continue on its current path and thus reject proposals 101 and 103. We will have representatives at your Ketchikan meeting and plan to testify as well as participate in the committee process.

Sincerely,

John Woodruff

VP – Operations

OBI Seafoods LLC

John.woodruff@obiseafoods.com

P: (206) 286-5800

1100 W. Ewing ST.

Seattle, WA 98119

www.OBISeafoods.com



Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

<http://www.boards.adfg.state.ak.us/>

RE: Comments on herring proposals for SE Finfish Meeting--Jan. 4-Jan. 15, 2021

Mr. Chairman and Board Members,

I am writing to express:

Support for proposals 161

Opposition to proposals 156, 157 and 158

Proposal 156, 157 and 158: Oppose

OBI Seafoods opposes these three proposals, as a processor (Icicle now OBI), that has been in the Sitka Sac roe fishery since the beginning. We have seen the ebb and flow of herring from record highs to record lows. We understand the volatility of this fishery. One thing that has been a constant is the Department's determination to do what is right for the herring biomass. Alaska Department of Fish and Game employees are a dedicated team of scientists that have the sole job to scientifically ensure the health of the herring biomass in Sitka and around the State. The department tries to accurately predict the harvestable surplus and overall health of the fishery through dive surveys, sonar mapping and sampling. We feel the department has done an excellent job in maintaining the health of the fishery and we urge the board to follow the science and ignore political pressure.

We have seen similar proposals in previous board cycles, with the same deficiencies fail time and time again. We ask that this board implore the same discerning wisdom that has prevented proposals like these from compromising the science-based integrity of the management strategy regulating this fishery. The current management plan is time-tested, responsive to stock changes, conservative, uses the best available management science, and provides for a subsistence priority while allowing for a commercial fishery on available surpluses. Why change a successful strategy?



The claim that the older fish are at a critical risk as suggested in proposals 157 and 158 is clearly a 'red herring', as the claim isn't supported by verified data. The analysis using age 3-4 year old fish to calculate excessive harvest rates on older fish as noted in Proposal 157 is particularly disingenuous since the younger fish are typically immature and not even available to the fishery. Other contentions that are presented as factual by these proposals, such as fealty to spawning locations, are not backed by observable data and facts. Furthermore, the declaration made in proposals 156 and 157 that subsistence harvesters are unable to "...meet their needs" speaks nothing to the actual statute requirement, which is to provide for "reasonable opportunity", a condition that is clearly being met within the current management strategy.

In Summary, these proposals are rife with inaccurate unsubstantiated statements, and fail to acknowledge the historic genesis of the harvest rate percentage. Similar attempts to corrupt the existing management plan have thankfully been voted down by previous boards, and we would ask the current members to do the same again by taking no action or rejecting these proposals outright.

Proposal 161: Support

This proposal would establish a permit or registration system for the harvest of herring roe on branches. Most other subsistence fisheries in Southeast and throughout the state require a permit to operate. Consequently, this would not be a unique situation to require one in Sitka. The roe on branches fishery is constrained only by timing of spawn and effort expended to harvest the product. There is no harvest limit, and no way to account for the amount of product that is being removed from the resource. This proposal would facilitate valuable data collection that could be used to better manage the resource for the benefit of all stakeholder groups.

OBI seafoods ask that you approve this proposal.

Submitted By
Oliver Price
Submitted On
12/22/2021 10:43:26 PM
Affiliation



PC284
1 of 1

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest. I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. The ongoing existence of herring runs and subsistence harvest are incredibly important to myself as someone who's family relied heavily on subsistence harvest in hard times. I believe in this matter and others, that the board of fish should prioritize indigenous knowledge and the rights of subsistence users over the minority concerns of commercial users. Oliver Price



ADF&G, Boards Support Section
Juneau, AK 99811-5526
P.O. Box 115526
dfg.bof.comments@alaska.gov

Alaska Board of Fisheries
Attn: Executive Director
glenn.haight@alaska.gov

RE: Second request to schedule consideration of Proposal 282 after March 2022 meetings

Chairman Carlson-Van Dort and Board Members:

In October, the Board accepted an out-of-cycle agenda change request (ACR 7) that asks the Board to restrict salmon fishing in Area M. The Board scheduled its consideration of ACR 7 (now proposal 282) during the March 11-18th meeting, which conflicts with the State-water Pacific cod fishery that sees significant participation by Area M salmon fishermen.¹ Because public participation and an opportunity to be heard are essential components to the Board process, **we respectfully ask the Board to reschedule its consideration of Proposal 282 to a later date in March or April that does not conflict with important federal and State Pacific cod fisheries that occur from January through the middle of March.**

The Board of Fisheries process is unique and durable due to its reliance on direct stakeholder participation for an understanding of impacts of proposed actions. While we understand that regular meeting cycles will, at times, conflict with fishing opportunities, the need to ensure public participation by affected parties for *out of cycle* actions is heightened given the short notice upon which ACRs are scheduled. As noted by several Board members and ADF&G staff during the deliberations on ACR 7, issues dealing Area M management are complex and far-reaching. In taking up Proposal 282, it would seem essential then, for the Board to hear from the stakeholders that will be most impacted by any Board action.

Thank you for your consideration,

¹ Based on 2021 CFEC data, 80 Area M salmon permit holders also hold State-water Pacific cod permits. Notably, this data does not capture Area M salmon permit holders that participate in the cod fishery as crew.



A black ink signature of Shannon Carroll, consisting of a large, stylized 'S' followed by a horizontal line.

Shannon Carroll, Director Fisheries Development & Alaska Public Affairs
Trident Seafoods

A blue ink signature of Abby Fredrick, written in a cursive style.

Abby Fredrick, Director of Communications
Silver Bay Seafoods

A black ink signature of Chris Barrows, featuring a large, stylized 'C' followed by the name 'Barrows' in a cursive script.

Chris Barrows, President
Pacific Seafood Processors Association

Submitted By
Patricia Roberts Alexander
Submitted On
12/22/2021 9:47:29 AM
Affiliation
Personal Recommendations



PC286
1 of 1

Pat Alexander – December 22, 2021

Comments to the Board of Fisheries

Proposals 156, 157, 158

Please vote yes. I strongly support these three proposals of the Sitka Tribe of Alaska.

Proposal 159 - Repealing 27.159 requiring ADFG to adjust the fishery in time and space to accommodate subsistence needs.

Please vote no. ADFG has the responsibility to manage the fishery during the in-season harvest to make sure that subsistence harvesters get the Amount Necessary for Subsistence. The actions ADFG takes to achieve the Amount Necessary for Subsistence need to be made known and followed. The loss of the STA lawsuit emphasizes that fact.

The Department needs to find ways to get input from the field as to the quality of the spawn and where it is happening. It should allow subsistence harvesters to share pictures or videos of thickness of the eggs on branches, kelp, or the sea hair to the Sitka Tribe of Alaska's Resource Protection Department head to collect for the ADFG and the public.

It doesn't make sense to me that taking of the herring eggs by subsistence harvest for hundreds of pounds is given negative attention (micro-managing) when the commercial herring sac roe fishery take is by the ton. Why does the industry not have to track where they are selling their products to and how much is waste?

For ADFG to fight like tigers to protect an unsure herring egg market when it has not met the Amount Necessary for Subsistence in a decade is shameful.

To an elder who can remember when the herring egg harvest was so plentiful that it was often 9-12 inches thick, it is heartbreaking to think of the changes. We now have tribal citizens who have not gotten herring eggs in years. It is part of our lifestyle and culture. It nourishes us spiritually and nutritionally.

Please remember the Board of Fish meeting in Sitka where almost a 100 people called for conservation of the herring. Listen to our voices this time.

Proposal 160 – Shrinking the subsistence only area

Please vote no. This area needs to remain a herring spawning area. It is close to town and more Natives can access the herring spawn if this protection is in place.

Proposal 61 - Requiring permits for subsistence harvesters

Please vote no. Alaska Natives want food sovereignty. In these Covid-19 times the grocery store shelves go bare and we must have the ability to feed our families as stated in the Alaska State Constitution. Long held scientific knowledge of the spawning habits of herring requires quick action. We should not create more barriers to participate.

Proposal 163 – Allows multiple ac-rope permits on one vessel in an “equal split” quota system

Please vote no. This could result in more catch and release to get older, bigger fish, causing more of the herring to die when handled by fishermen. The commercial sac roe fishers have fished out whole age classes. The older herring show the younger ones where to spawn where the eggs have the best chance of surviving. The sac roe fishery takes and takes the older fish so the younger herring have no older fish to teach them so they spawn in places where the eggs cannot survive.

Proposal 164 – Allows permit holder to over-fish quota by 10% one year and then under-fish by 10% the next year.

Please vote no. This proposal could increase the commercial sac roe fishers take of an already stressed resource.

Proposal 165 - Allows the unfished herring quota from the normal season to be secured as food or bait from October through February or expand the fishing area to Cape Ommaney.

Please vote no. This proposal increases pressure on the herring.



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Sitka, Alaska, and I participate in the subsistence salmon fisheries of the Southeast region. I have been involved in Native Traditional Fish Camps since I moved to Sitka in 1985. Traditional requirements for salmon run deep in this community. I work in a community that requires salmon to exist for health and well being of all those who live here. Salmon provides vital nutrients to my family and everyone I know in Sitka.

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,

Patricia Dick
sooktushaa@gmail.com
(907) 321-1927

Submitted By
Paul deMontigny
Submitted On
12/16/2021 3:26:10 PM
Affiliation
Power troll permit holder

Phone
907-518-4284
Email
Pdemon9@gmail.com
Address
373 Mitkof Hwy
Petersburg , Alaska 99833

I support Proposal 82. I do not support Proposal 83.



PC288
1 of 1



Dear Board of Fisheries,

My name is Peter Bradley – in recent years I was a resident of Sitka, Alaska.

I support proposals 156, 157, and 158, which I think are good initiatives to tune this management paradigm to better promote resilience, abundance, and – hopefully – subsistence availability, within the context of massive opportunity being provided to sac roe seine permit holders.

I oppose proposals 159, 160, and 161, which are offensive, baseless, bad faith proposals brought by the industry gear group against indigenous people. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

I am opposed to Proposal 163 and 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed fish behind while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they purport to address, and if these proposals are given serious consideration I think it should be without added benefits unrelated to safety considerations (multiple permits on each boat, and allowing the 10% over/under credit).

I oppose proposals 164, 165, and 233, which are inappropriate attempts at permit expansion.

I am writing out of continued concern that decision making processes involving herring in Southeast Alaska suffer from misinformation; various patterns of methodological drift between the 1970's and today - not accounted for by the "model" or by departmental assumptions – seem to be driving false narratives about herring population health under the current herring management paradigm.

For the last several years, I've closely studied historic ADFG reports on herring alongside a variety of other herring studies, reports, letters, articles — everything I can find about Pacific Herring from the 19th century on. It's a sort of comparative literature, and this work is an expression of my discomfort with ADFG's epistemic posture and the ways that ADFG systemically undermines indigenous knowledge systems.

As I've become more familiar with the workings of the fishery, I've come to understand that there is a massive discrepancy between the way that ADFG describes the trend of herring abundance in recent decades and the way that local - and long-time egg-on-branch harvesters in particular - perceive and experience it. Those harvesters often describe a general declining trend in herring abundance and availability of quality spawn for roe-on-branch harvest, especially in near-town areas, over the course of the last century.

What ADFG asserts is quite the opposite; their charts indicate a trend towards ever-greater abundance. It can't be overstated how different the ADFG stance is from local observation. This becomes particularly evident through reading scholarship like Herring Synthesis by Tom Thornton et al, listening to elders' testimony-on-tape from the 1997 Board of Fisheries meetings, and hearing what everybody had to say at the 2018 meetings. Few

people that I've discussed this with over the years would claim that the last couple decades have been better than any decade that came before, and yet that's what ADFG says that their data says has happened. In this comment, I will attempt to describe why I believe that the fishery is being managed on a shifting methodological baseline that makes the Department's purported biomass history inappropriate and misleading. In extension of this comment, I will also attach "Fishy Numbers: An Inquiry", which I wrote earlier this year about issues present in ADFG's current sampling protocols which may be resulting in the slaughter of older fish. I will begin by explaining why the biomass chart is important for this fishery, and how it is tied to the harvest control rule and to the Average Unfished Biomass figure. I will then outline several reasons that I believe that inflation has occurred over time in ADFG's assessed abundance of herring in Sitka Sound, namely:

1. Nobody tried to know the approximate total biomass of spawning herring in Sitka Sound until the mid-late 1980's – ADFG's attempts to do so retroactively are based on improper use of available data and should be considered ***unsubstantiated and conjectural***
2. 1970's study focused on specific wintering populations in small areas using hydroacoustic gear; study did not encompass the entire area
3. Sitka Sound sac roe seine fishery rapidly accrued new areas following Limited Entry
4. Management became more obligated to support the value of the fishery with time by helping find more bigger older fish, especially with a) limited entry, b) the 1992 regulatory change, and c) the gradual shift from a luxury product fishery to a volume fishery
5. Survey effort has expanded in time and space
6. Market conditions transformed this from a luxury fishery to a volume fishery
7. Key biological assumptions like fecundity, maturity, and survival have shifted
8. Version Control / Selective Alterations to recent years
9. Technological evolution

In outlining these mischaracterizations inherent to ADFG's historic biomass estimates, what I hope to demonstrate here is this:

ADFG's contemporary narrative about historic biomass levels in Sitka Sound is absolutely lacking in evidence for years prior to 1976, is largely unsubstantiated through the 1980's and 1990's, and is subject to continuous methodological drift through to the present, and AS SUCH:

- The data points referenced by ADFG for many years demonstrate a massive misinterpretation and misrepresentation of available information and fail to account for changes in the goals of the assessment and study over the years as well as for changes in survey area, efficiency, and effort.
- ADFG has systematically failed to exercise intellectual humility at an organizational level and must correct this pattern. It falls on ADFG to properly represent their information so that it can harmonize with the lived reality of the people of the area.
- Herring, especially older herring, are likely being exploited at a higher rate in Sitka Sound than ever before;
- The AUB should be temporarily set at a much higher level – substantially higher than the average estimated biomass of the last 20 years - until such a time as a legitimate new study is completed.
- This body must take the routine failure to reach the Amount Necessary For Subsistence (ANS) seriously and engage with the obvious reality that this fishery has direct impacts on traditional Tlingit harvesting practices which must be prioritized.

The ADFG Biomass Chart

In 2019, when Alaska Department of Fish and Game was responding in court to Sitka Tribe of Alaska's allegations of mismanagement, ADFG Biometrician Sherri Dressel included the below chart in her affidavit and used it to represent ADFG's narrative about historic herring abundance of Southeast Alaska's Outer Coast. She wrote that the chart indicates that "The combined biomass of Sitka and Craig stocks are at a high level, compared to years since surveys have been conducted (1971), and at an intermediate level, compared to estimates of biomass back to 1926."

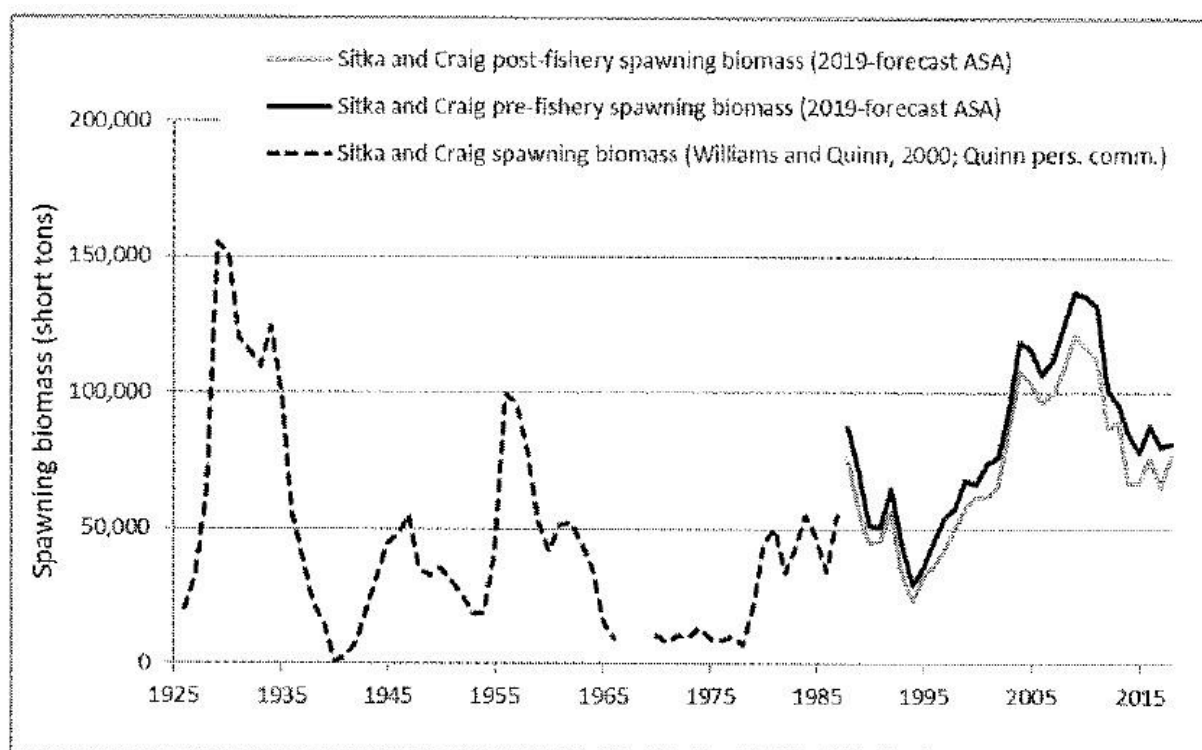


Figure 1 Sitka and Craig Spawning Biomass chart from ADFG Biometrician affidavit, 2019

Presentations of historic abundance such as this have served to delegitimize public outrage about the disappearance of herring populations to seine nets across Southeast Alaska over the course of the last century. This biomass chart serves to mask massive prior abundance and overstates prior population declines.

ADFG has been asserting an unscientific and ahistorical position, and the Department's assessments of historic biomass should not be used as a basis to assume that today's herring populations are healthy.

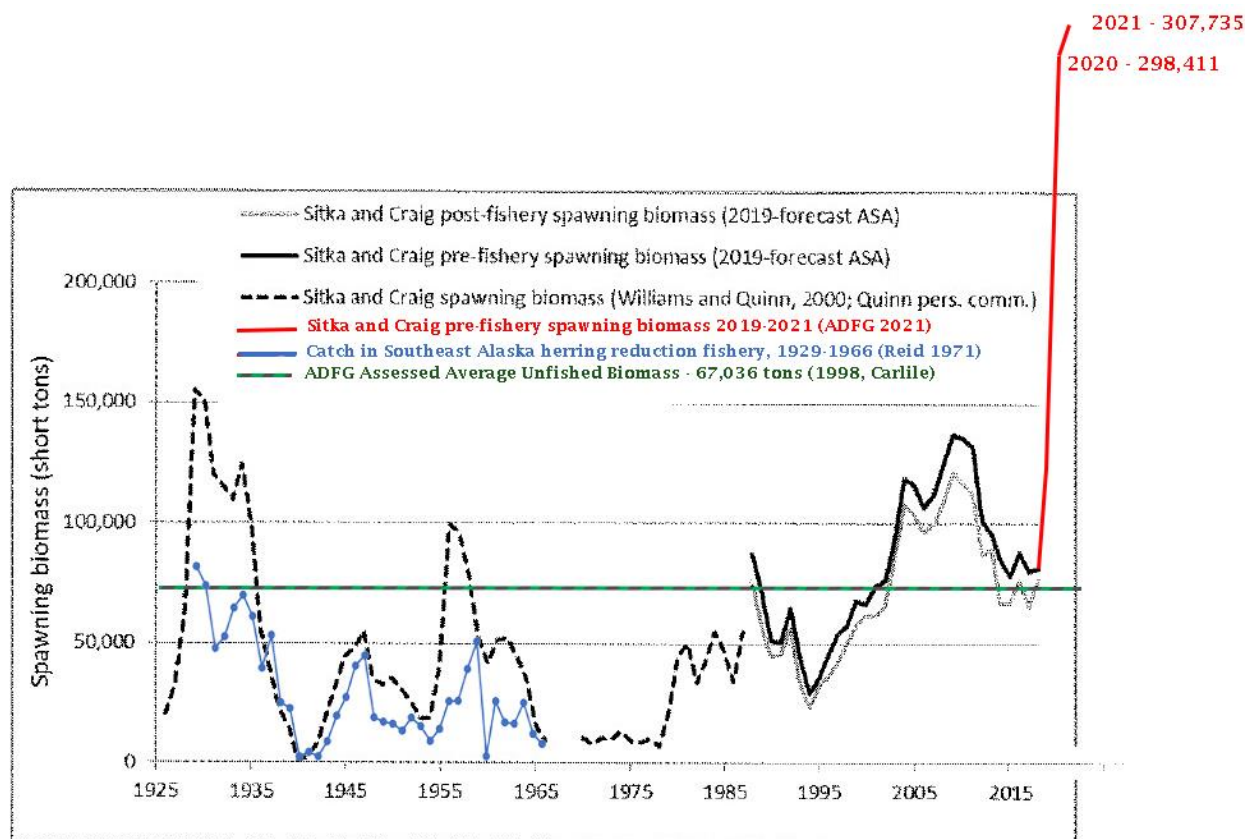


Figure 2: Sitka and Craig Spawning Biomass chart from ADFG Biometrician affidavit, modified to include a) the presumed "Average Unfished Biomass" as it has been set since 1998, b) The catch data in Reid 1971 referenced BY Williams and Quinn 2000, and c) the pre-fishery spawning biomass forecasts for 2020 and 2021 from available ADFG data.

Here is another image of the same chart, but this time I've added a few pieces of information - including ADFG's combined forecast for Sitka and Craig in 2020 and 2021 in red.

You can see that the chart gets rather silly with the addition of the two newest data points.

Given the extensive public record on the matter, **it is not credible** that there are thirty times more herring in Sitka Sound now than there were in the 1970's, nor that there are twice the herring now that there have ever been in the last century, nor that the population crashed in 1940, nor that the "Average Unfished Biomass" is reasonably set at a level that has been surpassed every year for 20 years in the course of intensive fishing. The chart betrays an obvious truth: the biomass estimates are inflating with time as the department responds to an expanding mandate by counting herring more thoroughly and efficiently.

Here is the biomass chart as it appeared in 1997, accompanying an ADFG staff note which indicated “The assertions made in this proposal that the Sitka Sound Herring Stock is depleted are not supported by available stock assessment data”. The proposal being considered was a moratorium proposed by STA due to very low herring abundance. The Department has never reported such a low biomass since.

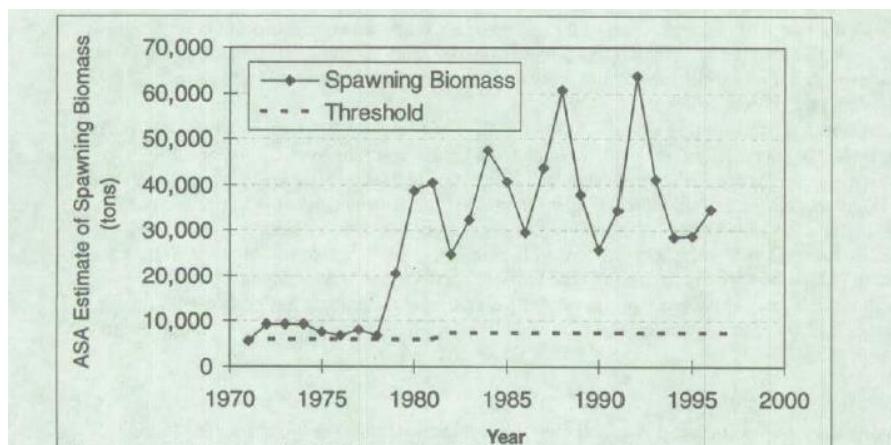


Figure 3 - age structured analysis estimate of Sitka herring spawning biomass, 1971-1996, from 1997 BoF

And here, one more, this from the 2021 pre-season meeting (before the estimates from 2008 and other recent years were significantly boosted):

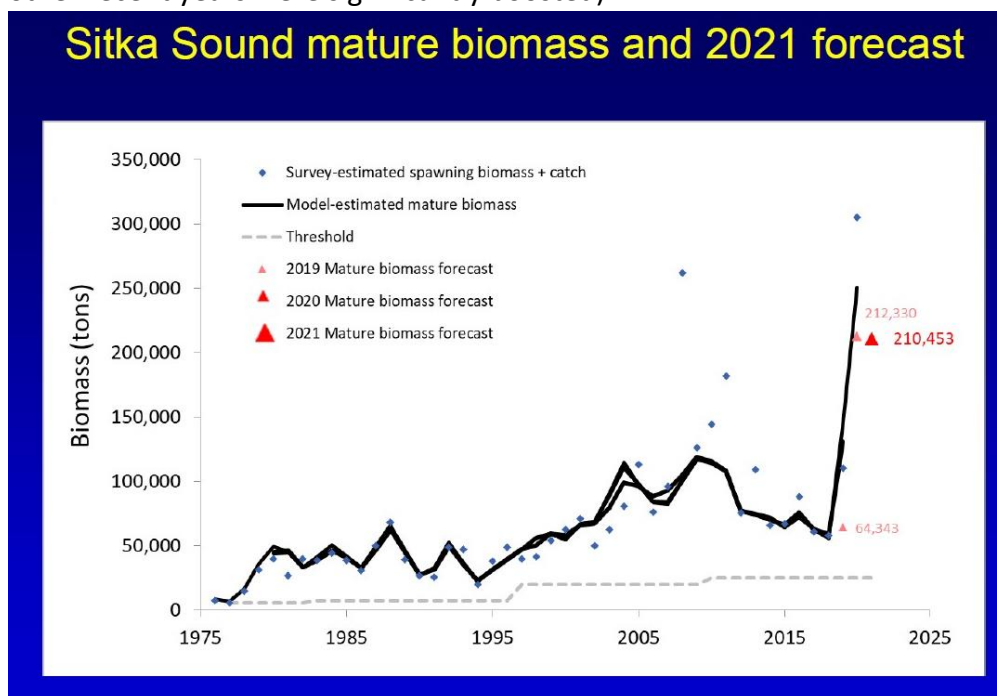


Figure 4 - Sitka Sound mature biomass and 2021 Forecast, from 2021 preseason meeting

ESTIMATE INFLATION AND THE AVERAGE UNFISHED BIOMASS

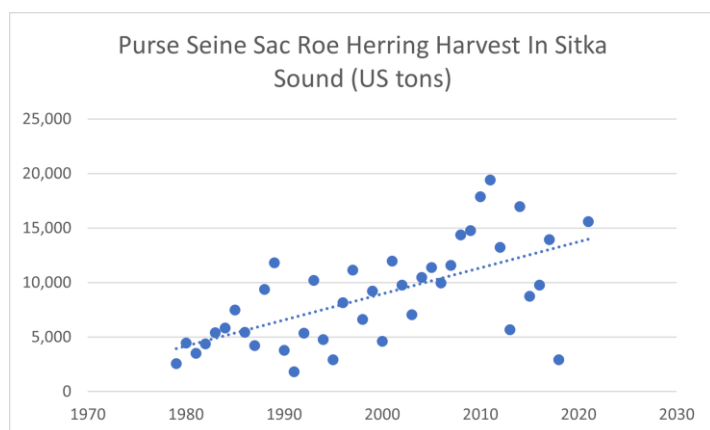
Take another look at chart at Figure 2 from two pages back – the green and black line running horizontally across the chart at 67,036 tons represents the Department’s assumed “Average Unfished (Pristine) Biomass”. The Average Unfished Biomass was determined by the department back in 1998, and was based on a computer model that simulated 2000 years without fishing pressure in Sitka Sound. Dr Dressel explained in her 2019 affidavit:

“12. In Sitka Sound, the harvest threshold is set at 37% of “pristine” biomass, where “pristine” is estimated as a long-term average of biomass in the absence of fishing and under average environmental conditions, also referred to as long-term average unfished biomass (AUB). Carlile (1998) conducted a simulation and estimated that the AUB for Sitka Sound herring at 67,036 tons based on data from 1971-1996. [...]”

19. With the threshold set at 30% of AUB, it no longer made biological sense to have a sliding scale in Sitka as gradual as before (reaching 20% at six times the threshold) because the population would need to be nearly double the average unfished biomass (unlikely to ever happen) before the 20% harvest rate would be reached.”

Within a few years of 1998, amidst larger fisheries than ever before, ADFG’s annual biomass estimates began to surpass that presumed “pristine” value; the biomass of herring in Sitka Sound has not dipped below the “Average Unfished Biomass” level for the last 20 years. The year after Dressel’s affidavit, the biomass went above 6 times the threshold, which she had just said was unlikely to ever happen. It would be funny if it weren’t such an alarming indication of ADFG’s ongoing biomass inflation. Since the AUB is connected to the harvest rule, the artificially low AUB is serving to allow the fishery to harvest at closer to 20% more often than is appropriate.

All the while, on the strength of rising biomass estimates, the commercial harvest has grown and grown, while subsistence users have complained of the most challenging roe-on-branch harvest years in memory.



SEVERAL FACTORS BEHIND THE INFLATION OF ADFG'S ESTIMATED ABUNDANCE OVER TIME:

1. Nobody tried to know the approximate total biomass of spawning herring in Sitka Sound for any year before the mid-late 1980's – any notion about total area biomass for years before that is *entirely conjectural and theoretical*

The data through 1970 is derived from catch numbers and the relative strength of individual year classes of herring as determined by catch samples from summer feeding grounds used by the fishery around Southeast Alaska. This data came from different locations across Southeast Alaska at different times, and came from summer feeding grounds rather than spring spawning grounds.

ADFG's attempt to chart biomass for years where they have no data results in some extraordinary misrepresentations in specific years. ADFG reports that in 1926, herring were at a very low ebb; in fact, Sitka herring were likely in near-pristine condition at that time and that point can be attributed to misuse of data. In 1940, ADFG reports that there was a total collapse in the Sitka & Craig Spawning population; there was no collapse that year in Sitka, and in fact USFW biologist Lawrence Kolloen reported a heavy spawning event which some in Sitka thought was the best in 5-6 years. The data for the 1950's and 1960's is artificially low because of the crash in the market for herring reduction products. All available evidence suggests that herring populations were higher in the 1960's than ADFG's flawed history suggests (in the late 1960's, for instance, Management Biologist Jim Parker wrote each year of a good spawning event in Sitka Sound), and that the population wasn't nearly so close to collapse as ADFG now claims for that time.

From 1971 through the early-1980's, biomass numbers are principally derived from hydroacoustic surveys and should be understood as MINIMUM biomass numbers of specific wintering populations within Sitka Sound, not as biomass estimates of the entire spawning population in Sitka Sound.

All of this is important because ADFG's Age Structured Analysis model for Sitka Sound herring is built on the rotten foundation of lousy, over-extended data from the 1920's to the 1980's.

2. 1970's numbers are derived from limited hydroacoustic estimates:

The ADFG herring research program was launched in 1969. For the first several years of the program, the fishery was allocated a 10% harvest level from specific wintering populations of herring – in Sitka, the study and fishery centered around the wintering herring in Katlian Bay.

The history of this fishery demonstrates that for most of the 1970's Katlian Bay was the core research and fishing area in Sitka Sound, and that the expansion to the much larger Sitka Sound area has occurred steadily with time. While present elsewhere in Sitka Sound, herring populations were not surveyed outside of the Katlian Bay area until 1978.

ADFG was focusing on Katlian as part of the "Gear-development" stage of their nascent study. Katlian Bay offered one of several "known wintering concentrations" of herring across Southeast Alaska, study of which would allow for a cautious and humble approach to development of the new fishery. The fishery was allocated

10% of the highest wintertime hydroacoustic survey at Katlian. ADFG wanted year by year comparisons of what they saw as a local or wintering stock: "While the acoustic techniques theoretically provide estimates of absolute population size, the principal need at this stage is for a relative index of population magnitude for annual comparison, Most fisheries are managed by relative rather than absolute indices. The major emphasis on future surveys must be to expend the necessary survey effort to obtain sufficiently precise estimates for year to year comparisons." ¹ In 1978, ADFG staffer Dennis Blankenblecker wrote: "Biomass assessments which are conducted by the Alaska Department of Fish and Game (ADF&G) on major stocks do not account for small discrete stocks found in most of Southeastern bays." ²

There are a few important things to note about hydroacoustics

- Through the 1970's, any aerial surveying and spawn deposition surveying was designed as a groundtruthing of hydro-acoustic estimates and - as advised in ADFG research reports in those times - should not be taken as comprehensive.
- The numbers cited nowadays as the "biomass" of herring in Sitka Sound for 1970's years was derived from the single largest survey of that year. Put another way, the biomass number for those years refers to how many herring were identified in a 1 square mile area in a 1-2 hour period. This reflects a minimum possible biomass of herring in Sitka Sound
- Further - there were many shortcomings for hydroacoustic studies, which is why they were phased out. These shortcomings were commonly referred to in ADFG research reports, and include the following:
 - Hydroacoustic technology was not able to measure herring in the shallows.
 - Hydroacoustic studies worked better at night to avoid tape saturation in the daytime when herring were deeper
 - The accuracy of hydroacoustics declined past a certain saturation point
 - Hydroacoustics were labor and time intensive.
- It is easy to see how each of the above listed factors would contribute to a minimization of biomass numbers for those years. The most important effect is that hydroacoustic studies provided a number that was the MINIMUM known biomass of herring in Sitka Sound. Nowadays, spawn deposition and ASA models provide a guess at the ABSOLUTE biomass of herring. The numbers which result from these vastly different approaches are not suitable for comparison.

When I have brought up this issue in the past, the department has denied that reliance on hydroacoustic studies continued for as long as it did. The 1980 staff report to the Board of Fisheries confirms it: "Egg deposition surveys were not attempted in Sitka Sound, due to lack of time, however, aerial spawning surveys verified that the acoustical biomass estimate of 79 million pounds was "in the ballpark." ³

3. The Sitka Sound sac roe herring fishery rapidly accrued new areas following Limited Entry in 1978

¹ Assessment of Southeastern Alaska Herring Stocks Using Hydroacoustical Techniques 1970-1971

² Blankenblecker, 1978 Report to the Board of Fisheries Southeastern Herring

³ Staff comment to Board of Fisheries, 1980



Katlan Bay wasn't the only place where herring were milling and spawning in Sitka Sound in the 1970's, and all documentation available – including Herring Synthesis, contemporary news articles, and legacy ADFG reports - establish clearly that there were other unstudied herring in other areas of what is now considered the Sitka Sound area.

However, until Limited Entry went through, management of the sac roe fishery was not practicable except on a very small scale. Limited Entry happened in 1978, which was also the first year that the fishery occurred outside of Katlian Bay - It occurred in Eastern Channel with a very conservative quota to account for the fact that the herring population in Eastern Channel was not being surveyed or researched at the time.

This excerpt from the Sitka Sentinel from April 1978 tells the story of what was going on:

*"Earlier in the season Department of Fish and Game research biologists, using **electronic hydro-acoustical gear**, had made a population estimate of 29 million pounds of herring in the **area of Sitka Sound west of the bridge**. This was the **largest specific wintering population estimate** made in Southeast Alaska since this research began in 1969. Jim Parker, commercial fisheries management biologist for the Sitka area, noted that the Department is **committed in the management of these sac roe fisheries to minimize the harvest of immature herring** and to not open these fisheries **until at least a 10 percent mature sac roe can be obtained in the harvest**. Test fishing in the area west of the bridge showed that a large percentage of the herring population consisted of immature fish and samples showed that the percentage of the mature sac roe recovery would not reach ten percent. This situation persisted until after spawning began and therefore **no fishery was allowed** in the area west of the bridge. If test fishing had shown that mature herring with an acceptable recovery of mature sac roe could be obtained, a fishery near the 10 percent harvest level of about 1,450 tons, would have been possible this year. On the east side of Sitka Sound test fishing samples showed a large proportion of mature fish and a possible mature sac roe recovery of 11 percent. However, **because it is not known** whether the herring on the east side are a **separate spawning stock**, **only a small portion of this area was opened** to commercial fishing. **This restricted fishing area included only half of the area where schools of herring were observed along the beaches from aerial surveys.**"⁴*

In 1979, partially on the strength of a good recruit class, the research area was expanded to extend up to Goddard, an area which seiners had been clamoring to get to for a few years at that point. At the 1977 BoF meeting, Southeast Alaska Seine Boat Owners and Operators had said of Goddard area:

"There is no herring fishing in this area for bait or food. There are winter stocks that have never been surveyed since statehood and should be surveyed and utilized."⁵

⁴ Sitka Sentinel, Herring Sac Roe Fishery In Sitka Nets 250 Tons, April 19, 1978.

⁵ Board of Fish Proposals 212, 213, December 1977, Anchorage.



As the years went on, more and more areas were tacked on to the fishery. Much of this area expansion happened during cooperative fishing years when the seiners could go free-range fishing and scout previously underexplored areas. On a number of occasions, the Board of Fisheries as voted to officially expand the area for the Sitka Sound herring fishery AFTER sac roe fishing has occurred in those areas under emergency orders in cooperative seasons. With time, the area has steadily grown to include locations like Silver Bay, Deep Inlet, Goddard, Windy Passage, Necker Bay, and Crawfish Inlet to the South, Kruzof Island to the West, and Krestof Sound, Nakwasina Sound, and Salisbury Sound to the north. Each of those areas is studied much more intensively now than in the first decades of the sac roe fishery.

These expansions did not happen because herring suddenly moved or expanded to those places - there is ample evidence that these areas often hosted herring spawning events unaccounted for in ADFG's earlier records.

4. Management became more obligated to support the value of the fishery with time by helping find bigger older fish

The following regulation, ***Management guidelines for commercial herring sac roe fisheries (5 AAC 27.059)***, was put into place in 1992, entrenching a symbiotic relationship between ADFG and the commercial fishery; it reads:

(a) If the department has adequate information, and if department management programs are in place, the department may manage commercial herring sac roe fisheries, to enhance the value of the landed product as follows:

(1) fishing periods may be established by emergency order in areas and during times when sampling has demonstrated, or when other factors indicate, that the herring roe content of the catch is likely to be highest;

(2) fishing periods may be established by emergency order in areas and during times when sampling has demonstrated, or when other factors indicate, that the catch is composed of the maximum average size of herring available for the stock;

(3) in a preseason management plan, the department shall specify the particular herring fisheries that are to be managed to enhance the value of the landed product.

(b) The department may modify herring sac roe fishing periods and areas to minimize the harvest of recruit-sized herring during the conduct of a sac roe fishery that targets post-recruit herring.

This regulation in effect gave ADFG staff a new mandate to aid and assist in search efforts for higher value concentrations of herring in the area, bringing all of the power and authority of the Department into the effort to find, count, and fish herring in Sitka Sound. A natural effect of this regulation is that more and more herring have been identified for the fishery ever since.



5. Survey Effort Has Expanded in Time and Space

ADFG reports demonstrate that aerial surveying has expanded dramatically – nowadays, there are daily survey flights and the far reaches of the area (like Crawfish Inlet and Necker Bay, Kruzof shoreline, and Salisbury Sound) are being checked for spawn every few days. There was a time where those areas weren't visited by flights at all, and then there was a time when they were checked just a few times in a season. Every ADFG report through the 1980's contains warnings not to draw conclusions from the data as if it is comprehensive.

Other survey expansions have also occurred in that time. ADFG is now diving deeper to count eggs than was true prior to the 2000's – in 1999, ADFG regs prohibited their divers from diving below 15m of water to count eggs. A major proportion of the high egg counts in 2008, 2019, and 2020 came from the deep, heavy spawn deposition along the South and West Kruzof shorelines. Personal correspondence with Kyle Hebert established that the Kruzof Island transects which allowed for those surveys a) only happened because diving conditions were perfect on the scheduled days and b) included large egg counts from below the historic dive-depth cut-off.

Every mile of spawn that gets spotted, and every additional degree of spawning depth which is measured, contributes to a higher biomass. Increased survey intensity contributes directly to biomass inflation over time.

6. Prices transformed this from a luxury fishery to a volume fishery

In earlier years of this fishery, prices for sac roe were quite good. In more recent years, the prices aren't so good. To yield profit, this fishery has transitioned gradually into being a volume/margin fishery rather than a small-scale fishery with a luxury product. These other changes – expanding the area, counting eggs more intensely, surveying more frequently, and a management obligation to “enhance the value” – have happened in service of adapting to the market demands of the fishery.

7. Fecundity and survival assumptions have changed

There have been a number of massive changes in the assumptions made by the Department in their modeling of herring over the years. One such change is a shift that took place in 2006 regarding annual survival estimates for herring. For all years before 2006, the Department assumes a 50% survival rate for every age class, every year. For all years since 2006, the Department assumes a 75% survival rate for every age class, every year. That means more of the herring represented by the prior year's spawn deposition survey are now expected to be alive and available for the fishery than is true for years before 2006.

Fecundity assumptions, which have a massive bearing on biomass estimates, have also been changed periodically when convenient for the Department. This has been done 4 or 5 times in the life of this fishery, but has not been done since 2005.

8. Version Control / Selective Alteration of Prior Data - ADFG has dramatically raised numbers for recent years of study but has never dramatically raised numbers for prior phases of study

Since launching the ASA model, ADFG has received criticism for “version control” – the Department has done an awful job of tracking and explaining the adjustments that the model has made to the Department’s numbers.

The most recent example of that appears in *Fishery Management Report no21-23: Southeast Alaska–Yakutat Management Area Herring Fisheries Management Report, 2017–2020*. It appears from the biomass charts on p37 of that document that ADFG is now prepared to nearly ****triple**** their prior biomass estimate for the year 2008 from 87,715 tons to what appears to be something in the vicinity of 240,000 tons. This change is happening because the high egg estimate in 2008 was initially rejected by the model as unrealistic, but now that similarly high egg counts have taken place in 2019 and 2020, the model is more accepting of historic high counts on egg deposition surveys. It appears that the model is effectively being trained to accept higher and higher survey amounts over time, but because survey effort and intensity were so low in the 1980’s, the model will never substantially adjust those older figures.

9. Technological Evolution

Technology shifts have made massive change to the thoroughness of research and fishing efforts — echo-sounders, more powerful skiffs, spotter planes, etc. One study suggests that fishing fleet power doubles every 35 years, and we can see that echoed in the history of the herring fishery.⁶ Given the growing role of the fleet in contributing to surveying and sampling over the years, the same assumption should be made about a doubling in surveying power.

CONCLUSION

I offer this comment today because I believe that the modern research and fishing program in Sitka Sound is dangerous. The vast cultural, nutritional, and ecological importance of Pacific Herring cannot be overstated, nor can be the long story of sorrowful consequences for those causes in locations up and down the coast due to decades of chronic overfishing.

Management practices have not been respectful of subsistence users. A review of recent history makes it clear that the observations, testimonies, and needs of entities like Sitka Tribe of Alaska and the Central Council of Tlingit and Haida, and the individuals and communities who they represent, have been shunted aside in favor of a symbiotic relationship between Alaska Department of Fish and Game and the purse seine sac-roe herring permit holders.

The modern biomass graph presents a very convincing case for healthy stocks, but the conclusion it proposes is falsely premised. In the three decades since ADFG began presuming to know the biomass of herring in Sitka, the Departmental approach to information has led to a false impression of extraordinary contemporary abundance relative to the last century. This false impression has been at the heart of all Board of Fisheries decisions about Sitka Sound herring in that time and has influenced a 20-year series

⁶ Maria L. D. Palomares and Daniel Pauly . On the creeping increase of vessels’ fishing power. <https://www.ecologyandsociety.org/vol24/iss3/art31/ES-2019-11136.pdf>



of the most intensive harvests of herring in Sitka Sound on record. These intensive harvests have harmed subsistence users.

The research model has in some regards come a long way from the experimental management of the 1960's, 1970's, and 1980's. For those years, we have a lost history; we shouldn't pretend to know the biomass of herring in those years in "Sitka Sound". This is because the survey sets have changed and the data isn't calibrated, the results haven't always been directed towards the same purposes, important details have been lost to time, and much of this has happened in experimental terms. It is not appropriate for the department to use this data to make year-to-year comparisons.

It's still a new science, this counting of fish in the sea; we don't know much and we don't know what we don't know. What we know is this: the catch of this fishery has trended up and up and up over the years as surveys have located more fish.

It lies with the department to evolve its stance to make room for the truth of the local experience of the disappearance of herring from near-town areas, and it lies with you to confront the ongoing expansion of this commercial sac roe herring fishery in Sitka Sound by taking serious measures towards conservation and subsistence prioritization this cycle.

Thank you for your consideration.

Regards,

Peter Bradley

P.S. [Attached here is "Fishy Numbers"](#), an inquiry responding to the unusually poor-quality information which ADFG utilized as the basis for allowing record-high GHs in 2020 and 2021. I fully expected that the department would release 2021 survey results in time for this public comment period, and I regret that because that information is still unavailable I haven't had an opportunity to update the document with new information.



fishy numbers : high herring harvest levels in Sitka Sound built on misuse of data

By: [Peter Bradley](#)

The 2021 Sitka sac roe herring fishery was allocated a massive “Guideline Harvest Level” on the strength of low quality data, and the disproportionate slaughter of older herring likely resulted. A lack of elder herring is bad news for herring and humans alike.

This article is an exploration of apparent implications of ADFG’s decision to arbitrarily base assumptions for the 2021 fishery on outdated weight-at-age and fecundity information. What does it mean if the herring are smaller-at-age than ADFG has assumed, and is it likely that that’s the case?

[This is a modified version of “Fishy Numbers: An Inquiry”, originally posted on March 28, 2021.](#) It has been shortened and reorganized for clarity. The original version includes more charts and details in case you’re looking for more background after reading this.

Introduction

I am writing this to raise pressing questions about certain elements of ADFG’s arcane herring management methodology as it applied to this year’s fishery. This year, ADFG authorized an aggressive “Guideline Harvest Level” (GHL) based on poor quality information. Management approaches to the 2021 fishery — permissible via current regulations — represented unacceptable risk to population resilience.

My concerns relate significantly to a regulatory deficiency identified by Sitka Tribe of Alaska in Proposal 157, which is up for consideration at the 2021–22 BoF meeting in Ketchikan (Jan 4–16, 2022):

From Proposal 157 (Sitka Tribe of Alaska): Theoretically, under current regulations, the entire guideline harvest level (GHL), or even 100% of the older population, could be taken with the largest most fecund herring leaving few large fish to spawn, if the fishery was efficient when selectively harvesting large herring. This is an obvious, unintended deficiency in the current regulation.

My concerns also go beyond this obvious regulatory deficiency; I find that ADFG’s model has not been fed data of adequate timeliness and quality at a time when population dynamics are unusual. [There’s a data science term for what happens in these situations: “garbage in, garbage out”](#). This year, the situation — combining deficient regulations with garbage data and a lack of historic perspective — was unusual and risky enough that some scrutiny of ADFG herring management and modeling is necessary.

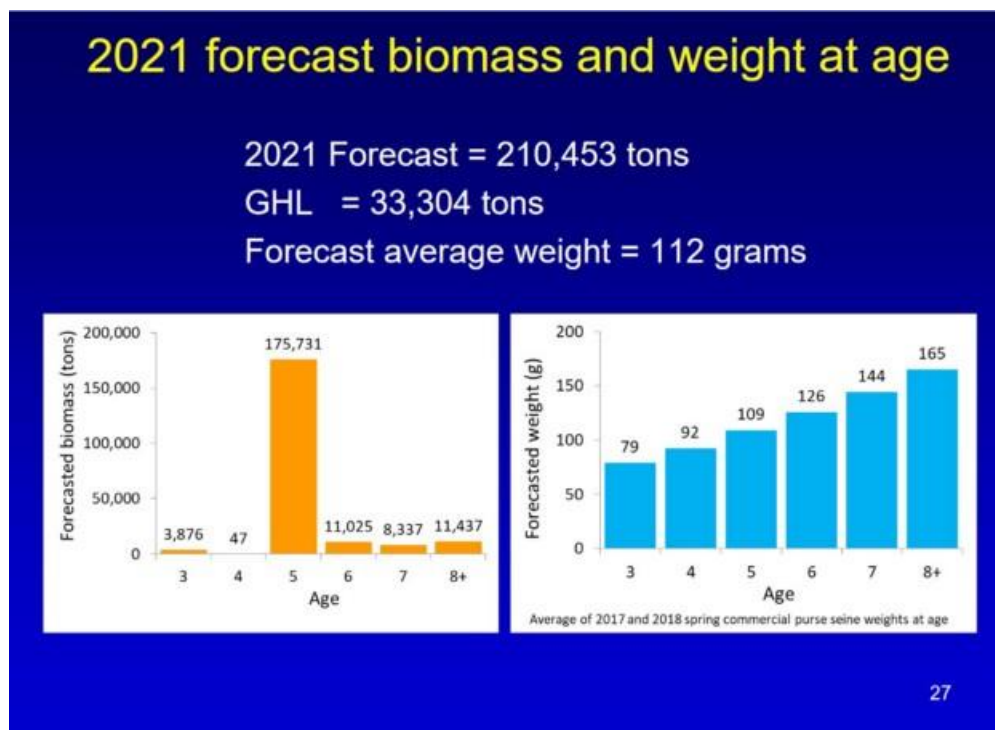


What I'm worried about is that *if* age-5 herring came in smaller than arbitrarily forecast at 109g, *and if* the average herring catch did indeed suit the market desire for 110g herring, then that means that a disproportionate chunk of the catch was from ages 6 and above, and those age classes could be nearly decimated.

In this piece, I will:

- outline the elements of the forecast which defined the 2021 Sitka Sound sac roe herring fishery
- explain how the department forms assumptions, determinations, and forecasts around biomass, population structure, and fecundity
- describe why *this year's* forecast was *unusually* speculative, and will point to in-season management implications of erroneous forecasts
- share some of the signals in current and historic data which indicate that this year's assumptions and forecast may have been off mark, with major implications for herring age structure in Sitka Sound for years to come [\[for now, the initial version of Fishy Numbers has a little more of this context than this version does\]](#)
- refer to the most recent information provided by the Department, much of it from the March 12, 2021 [Sitka Herring Informational Meeting](#), including the "[Sitka Sound Herring Forecasts 2020+2021](#)" presentation by ADFG biometrician Dr. Sherri Dressel, the "[ADF&G Herring Survey and Sampling Results 2019 and 2020](#)" presentation by Kyle Hebert, along with the [recent Stock Assessment Surveys](#) including the [2019 Stock Assessment Surveys](#), and [ADFG's map set of observed nautical miles of spawn in Sitka Sound dating back to 1964](#).

The Forecast

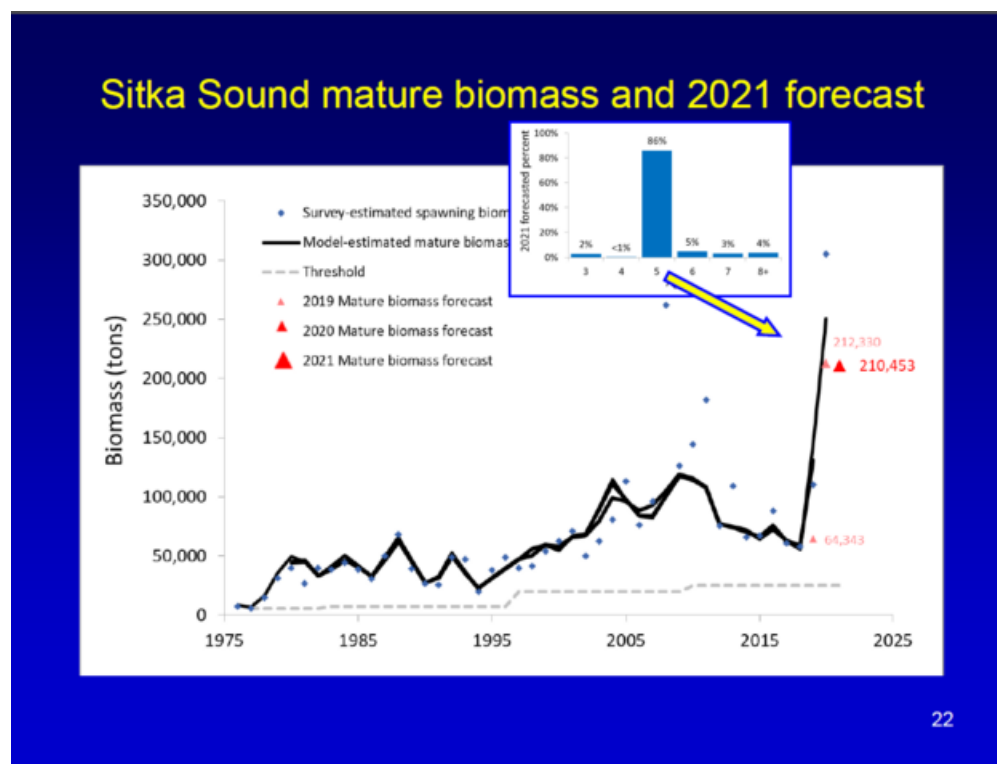


The slide to the left with heading “2021 forecast biomass and weight at age” was shown on March 12, 2021 at the [Sitka Herring Informational Meeting](#).

It represents the departmental forecast for the 2021 Sitka Sound Sac Roe fishery, and indicates that:

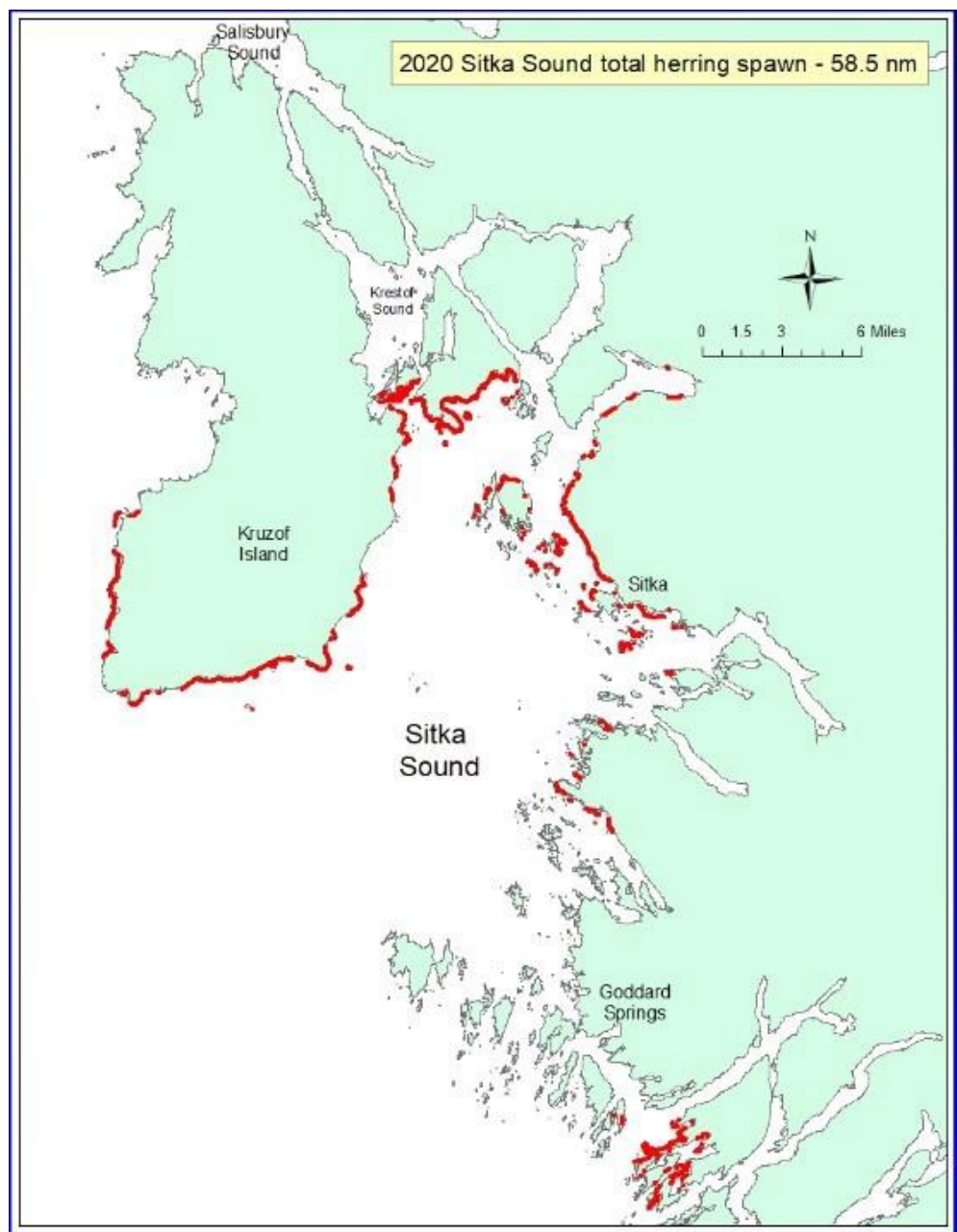
- A forecast **210,453 tons** of mature (age 3+) herring would be spawning in Sitka Sound in Spring 2021. That’s among the very highest ADFG estimates ever.
- Given the high biomass, the “Guideline Harvest Level” — the maximum amount of herring available for the sac roe seine fishery, at 20% of biomass — would be a record high **33,304 tons**. *[Ultimately the fishery brought in 16,000 tons— an immensity, even at half the GHL— of the largest herring they could locate.]*
- The vast majority (175,731 tons) of Sitka Sound herring would be age-5, with lower numbers of age 6–15+ herring (30,799 tons combined) and very low numbers (3,923 tons combined) of age 3+4 herring. While dominant age cohorts of herring can occur rarely does one cohort represent nearly 90% of the population at age-5.
- That the forecast average weight of mature herring would be 112 grams. (It was established in advance of the fishery that the market needed herring hauls averaging 110g or above.)
- That those age-5 herring would weigh, on average, 109 grams. That forecast is highly problematic, given the caption that it is based not on any observation of the fish in question but instead on an “Average of 2017 and 2018 spring commercial purse seine weights at age”. I believe that the best available evidence in advance of the fishery suggested that the age-5 herring would be smaller than that, averaging well below market needs.

Three Process Problems with the Forecast



An intensely misleading chart depicting ADFG estimate of Sitka Sound herring population biomass over time. Survey area, intensity, efficiency, and rationale has changed dramatically.

The biomass forecast (at 210,453 tons going into the 2021 season) is arrived at indirectly; the foundation of the estimate is (now) the estimated herring egg deposition in Sitka Sound. A total egg deposition estimate for Sitka Sound is arrived at by tracking spawning in the area daily via aerial surveys and then conducting dive samples assessing egg deposition at intervals along areas where spawning was seen.





Sitka Sound herring spawn metrics (last 10 years)

| Year | spawn mileage (nm) | mean transect length (m) | spawn area (m ²) | egg density (eggs/m ²) | total egg deposition (trillions) |
|---------|-----------------------|-----------------------------|---------------------------------|---------------------------------------|--|
| 2011 | 78.3 | 79.4 | 11,513,921 | 1,021,360 | 13.067 |
| 2012 | 55.9 | 61.1 | 6,325,487 | 708,533 | 4.980 |
| 2013 | 61.3 | 76.0 | 8,629,698 | 852,680 | 8.330 |
| 2014 | 50.0 | 62.5 | 5,784,311 | 616,221 | 3.960 |
| 2015 | 87.9 | 43.9 | 7,142,409 | 578,850 | 4.594 |
| 2016 | 63.3 | 80.4 | 9,428,167 | 592,993 | 5.979 |
| 2017 | 62.3 | 48.7 | 5,810,652 | 508,433 | 3.618 |
| 2018 | 33.1 | 94.4 | 5,540,258 | 692,405 | 4.216 |
| 2019 | 55.8 | 90.0 | 9,339,573 | 737,051 | 8.195 |
| 2020 | 58.5 | 145.5 | 12,984,592 | 1,598,671 | 23.065 |
| Average | 60.9 | 70.7 | 7,723,831 | 700,947 | 6.326 |

Newest data point for ASA model

9

In 2020, ADFG reported 58.5 nautical miles of spawning, and from their dive surveys along those miles, determined that there were 23 trillion eggs in Sitka Sound- more than the department has ever registered before. This metric is highly dependent on survey effort, efficiency, and area; each parameter has increased steadily over the last 50 years.

Problem 1: Egg deposition surveys in Sitka Sound have become more extensive and thorough as the years have gone on, making older biomass estimates appear low. Historic biomass numbers should be considered unsuitable for comparison. The newest example of the ever-expanding survey area is Outer Kruzof; Outer Kruzof wasn't considered to be within the scope of the survey area 25 years ago. Additionally, a great proportion of which were counted at depths that the department wouldn't have dived to in previous generations of study.

From a count of 23 trillion eggs, it is with a combination of surveying, deduction and conjecture that the age structure and biomass of fish required to produce those eggs.

The Department collects age/weight/length samples that establish **weight-at-age** (size on average for each age-class) and **proportion-at-age** (what proportion of the biomass consists of the different age classes).

Table 10.—Summary of age, weight, and length for the Sitka Sound herring stock in 2015–16.

| Gear type/season | Parameter | Age Category | | | | | | Total |
|---------------------------------|-----------------------------|--------------|------|-------|-------|-------|-------|-------|
| | | 3 | 4 | 5 | 6 | 7 | 8+ | |
| survey cast net–spring | number of fish | 12 | 429 | 18 | 39 | 6 | 26 | 530 |
| | percent age composition | 2% | 81% | 3% | 7% | 1% | 5% | 100% |
| | average weight (g) | 57.6 | 83.6 | 90.3 | 112.3 | 106.1 | 153.2 | 100.5 |
| | standard dev. of weight (g) | 10.9 | 14.0 | 18.2 | 22.9 | 33.4 | 18.6 | 19.7 |
| | average length (mm) | 170 | 190 | 195 | 208 | 210 | 235 | 201 |
| | std. dev. of length (mm) | 8.2 | 7.9 | 9.5 | 11.2 | 302 | 17.4 | 10.3 |
| commercial purse seine–spring | number of fish | 9 | 392 | 19 | 68 | 10 | 27 | 525 |
| | percent age composition | 17% | 2% | 24% | 8% | 9% | 40% | 100% |
| | average weight (g) | 64.2 | 94.9 | 104.2 | 132.5 | 148.6 | 178.5 | 120.5 |
| | standard dev. of weight (g) | 8.4 | 14.3 | 17.7 | 22.7 | 28.0 | 28.9 | 20.0 |
| | average length (mm) | 170 | 193 | 200 | 213 | 218 | 236 | 205 |
| | std. dev. of length (mm) | 4.1 | 8.4 | 9.3 | 11.0 | 13.4 | 12.7 | 9.8 |
| test fishery purse seine–winter | number of fish | 12 | 393 | 27 | 55 | 15 | 19 | 521 |
| | percent age composition | 2% | 75% | 5% | 11% | 3% | 4% | 100% |
| | average weight (g) | 67.5 | 88.0 | 98.6 | 123.8 | 140.3 | 171.4 | 114.9 |
| | standard dev. of weight (g) | 16.5 | 12.8 | 16.8 | 23.1 | 36.4 | 19.3 | 20.8 |
| | average length (mm) | 172 | 190 | 197 | 209 | 217 | 238 | 204 |
| | std. dev. of length (mm) | 12.2 | 8.3 | 11.8 | 12.9 | 18.0 | 11.0 | 12.4 |

The most recent example of a Stock Assessment Survey using three sample methods, from 2015–2016.

For several years ending in 2016, that data was collected using three different methods of sampling herring each year: active spawning cast nets, commercial seining in the spring, and a purse seine test fishery in winter.

Problem 2: The winter test fisheries have been dropped since 2015–2016, and an over-reliance on data from the selective commercial fishery has resulted. Winter test fishing has not happened since 2015–16, in 2019/2020 there were no commercial fishery data to reference. Despite survey bias and selectivity problems, the department has favored data generated by the commercial fishery in recent years.

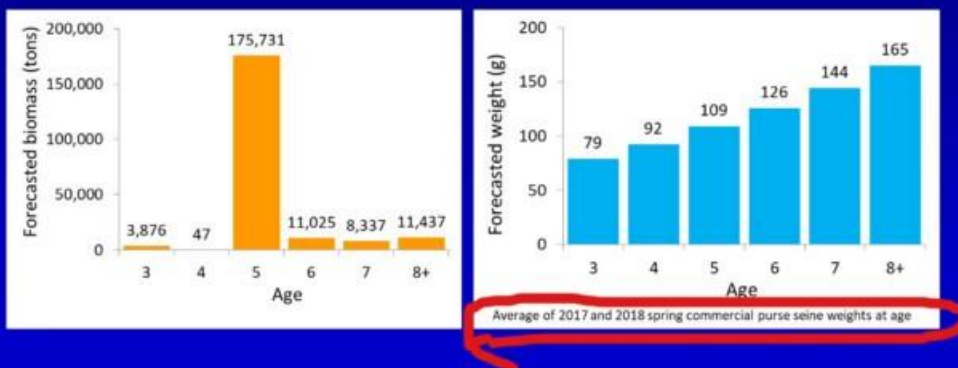
After becoming aware of a massive incoming age class in 2019, the Department made the unusual decision to base the forecasts for 2020 and 2021 on weight-at-age samples collected in the commercial fishery back in 2017 and 2018, rather than using the cast net samples which indicate herring which could be rather smaller than the forecast.

2021 forecast biomass and weight at age

2021 Forecast = 210,453 tons

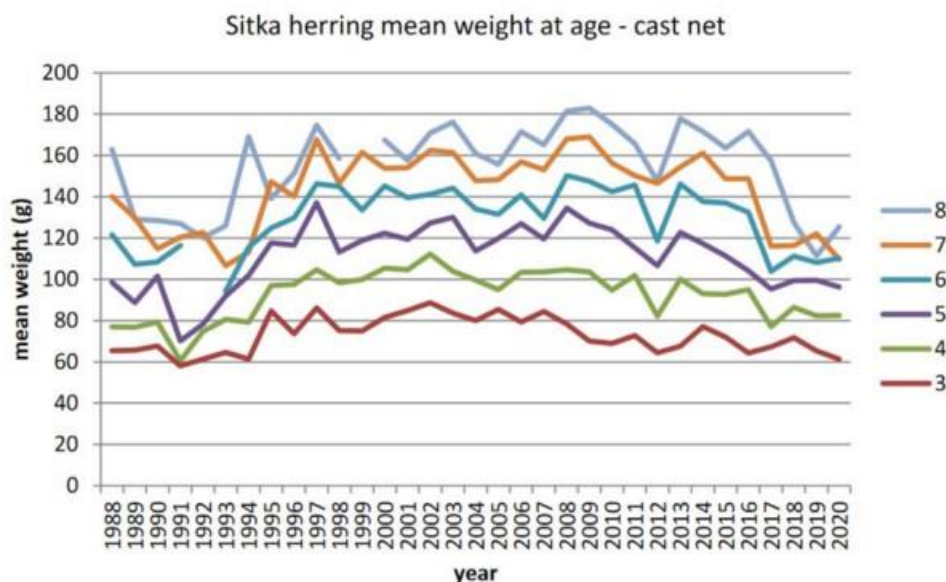
GHF = 33,304 tons

Forecast average weight = 112 grams



27

Once the Department has information on age-class proportions and average weight-at-age, ADFG needs a framework to determine the *fecundity:weight* relationships which describe how many eggs a herring of a certain size will carry.





ADFG has not done a new fecundity study or changed the weight:fecundity relationship since 2005.

Before that, there were studies in 1971, 1988/89, 1996, 1998. The results were substantially different each time.

In 2005, there was a diverse age structure with a generally high condition factor (bigger fish). Now, all ages are coming in small and the population is dominated by one age group.

Problem 3: Using that data as a key point in extrapolating biomass is sort of like budgeting a road trip using the 2005 price of fuel. Some years it'll match up, some years it won't.

At one time, the goal for the fecundity study was to “promote estimates of fecundity-at-weight at the extremes of the weight range that are within +/- 30% of the predicted fecundity, 90% of the time”. In how many years between 2005 and now has that goal been achieved? We have no way of knowing.

And so that is how the biomass is reached — by counting eggs using ever shifting methodology, sampling herring using ever shifting methodology, maintaining a static assumption about herring fecundity from 2005, and running it all through a computerized model that assumes it has all of the information it needs.

Recap: How the biomass is determined:

Step 1. Estimate the number of eggs in Sitka Sound through aerial surveys and follow-up dives to assess egg deposition. [Problem 1: survey effort and efficiency has increased with time, and ADFG dives deeper and has flown surveys on more days across a wider area as the years have gone on]

Step 2. Sample herring to figure out age composition and weight-at-age using one or more methods. [Problem 2: Increasing reliance on commercial catch data instead of less biased sources over time; in '20/'21, ADFG may have overestimated weight averages by referring to obsolete commercial data]

Step 3. Apply fecundity relationship [Problem 3: from 2005] to determine how many herring of those proportions it would take to produce that many eggs.

Step 4. Voila! Biomass 2021.

Long version:

See the most recent [stock assessment](#) for full methodology.

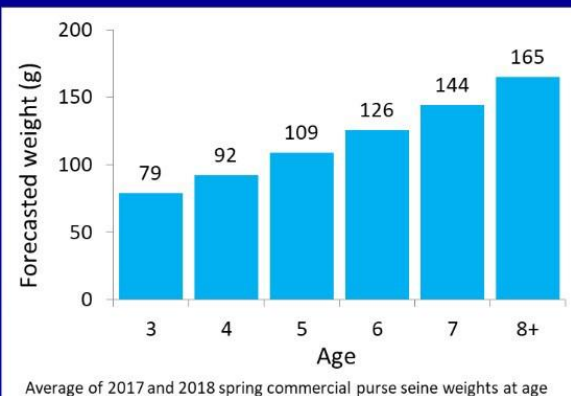
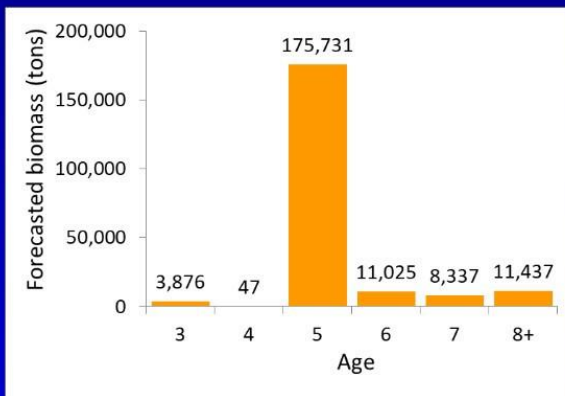
High GHL, High Risk:

2021 forecast biomass and weight at age

2021 Forecast = 210,453 tons

GHL = 33,304 tons

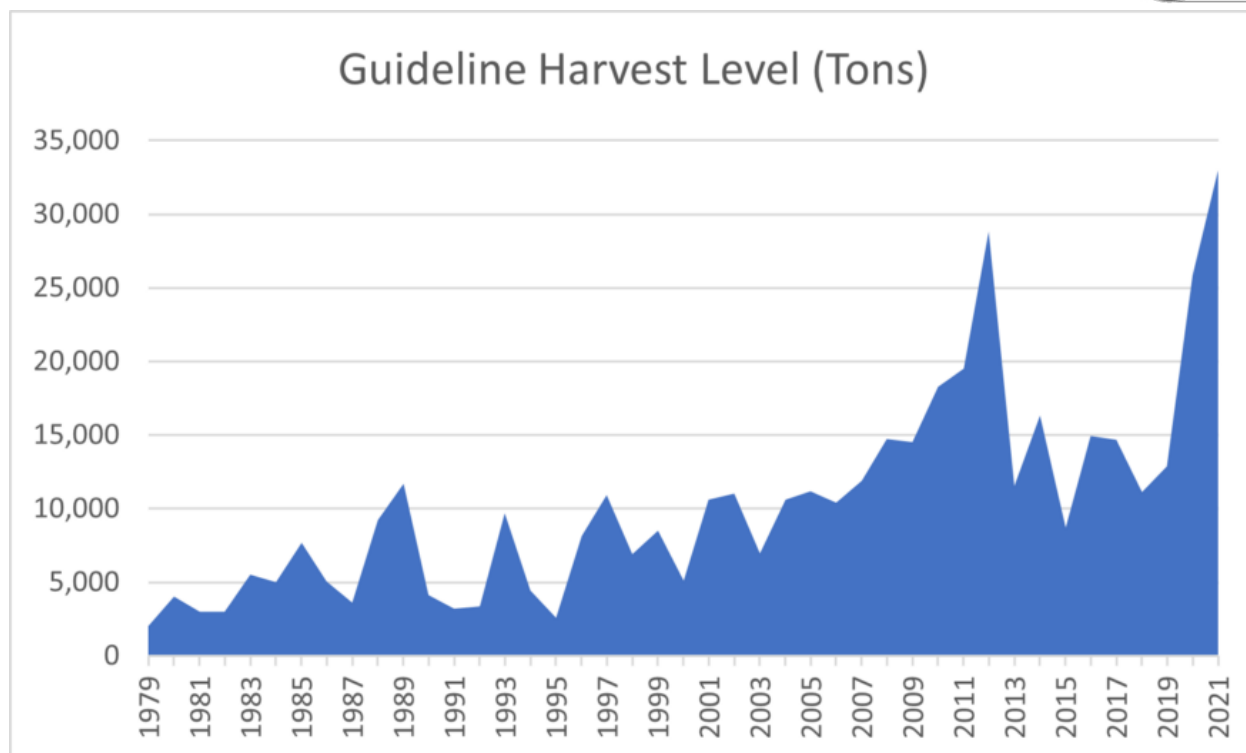
Forecast average weight = 112 grams



27

The upshot of all of this is that if the fishery successfully pulled in 16,000 tons of herring averaging 110-g, and if the cohort of age-5 herring were on average smaller than forecast (which appears highly possible from 2020 cast net surveys), then the relatively small populations of herring over age-6 were disproportionately slaughtered. Historically, it was not at all uncommon for herring in Southeast Alaska to live to 12–15 or older; this fishery systematically annihilates elder herring. It is a poor practice for ecosystem resilience and healthy maritime cultures.

That's bad for everybody.



The survey area, intensity, and efficiency have all increased over the years, leading to a higher “Guideline Harvest Level” as time has gone on. Given shifting methodology, the increasing GHL doesn’t mean that herring populations and herring population health have increased to scale with the GHL. Management must be very careful to avoid causing catastrophic harm with harvest levels set as high as they are today. Poor data was used heedlessly to guide 2020 and 2021 GHLS.

Some questions:

1. What was the average weight from the 2021 Sitka Sound sac roe fishery, and what was the average weight from the 2021 active spawn cast net surveys?
2. What was the average weight of age-5 herring in the 2021 Sitka Sound sac roe fishery? In the 2021 active spawn cast net surveys?
3. What were the proportions-at-age in the active spawn cast net surveys, in particular of the pre-2016 brood years? How do those numbers compare to the commercial harvest numbers?
4. By what mechanism did Outer Kruzof become part of the Sitka Sound sac roe fishery, and thus, part of the egg deposition count from which the biomass of Sitka Sound herring is reached? It was not part of the fishery in 1996. What has changed and when, exactly, did that change occur? How does ADFG account for expanding study area when making biomass comparisons over time?
5. How does ADFG account for bias in sample types and why have commercial test sets have become a favored metric? How does ADFG account for changes in sample methodology over time?



6. What was the deepest that dive surveys for eggs went in 2021? In 2020? In 2008? In 1989? How does the department account for inflation in biomass numbers from counting more eggs, deeper, as time goes on?
7. Why does ADFG believe that the 2005 fecundity data is appropriate for application to the dominant 2016 age cohort of herring and the small-at-age herring currently in Sitka Sound? What are the implications if the real fecundity was substantially different in 2021 than in 2005?

3015 112th AVE. NE SUITE 150 BELLEVUE, WA 98004-8001 206.728.6000

ADF&G, Boards Support Section
Juneau, AK 99811-5526
P.O. Box 115526
dfg.bof.comments@alaska.gov

Alaska Board of Fisheries
Attn: Executive Director
glenn.haight@alaska.gov

RE: Second Request to Schedule Consideration of Proposal 282 Issue Outside of March 2022 Meetings

On October 20, 2021 the Board accepted ACR 7 (now called Proposal 282) regarding changes to commercial fishing periods in the Shumagin Islands Section and Dolgoi Island Area for consideration at an upcoming Board meeting. On November 5, 2021, Area M Seiners Association submitted a letter to you requesting that ACR 7/Proposal 282 not be considered at the Board's March 11-18, 2022 meeting because the meeting dates conflict with the State-water Pacific cod fishery (5 AAC 28.081), in which a large proportion of Area M fishermen participate.

At the Board's December 6, 2021 meeting in Cordova, the Board considered Area M Seiners' request (PC014) and rejected it. In response to a request from the Chair, Executive Director Haight reported to the Board that CFEC records (RC122) show 21 permit holders hold both Area M *seine* permits and South Pen pot cod permits. The Board decided to not change the proposed schedule and Board Chair Carlson-Van Dort stated that there is plenty of opportunity for fishermen to express opinions and submit input.

The Board's decision was based on inaccurate information, which appears to have been solicited by the Chair in a deliberate attempt to misrepresent and downplay the scope of the scheduling conflict. The information was inaccurate in three respects.

First, as written, Proposal 282 requests restrictions on all gear types, not just seine gear. Thus, the scheduling conflict affects not just seine fishermen, but set and drift gill net fishermen as well. Based on CFEC data provided by ADF&G (attached), the number of Area M seiner, set net and drift gill net permit holders who also held cod permits was **79** in 2019, **57** in 2020 and **80** in 2021. By requesting and relying on data for seine permits only, the Chair substantially downplayed the extent of the conflict. (Notably, the CFEC data show that, even for seine permit holders the information presented to the Board was inaccurate; according to the CFEC, the number of Area M seine permit holders who also held cod permits was 28 in 2019, 27 in 2020 and 28 in 2021).

Second, by selecting 2020, the Chair downplayed the extent of the conflict. As the CFEC data show, the overlap in permit holders was significantly higher in 2019 and 2021. By selectively using data from 2020—the year in which the overlap was lowest in the last three years—the Chair presented biased data to the Board. This bias is compounded by the fact that the harvest limit for the cod fishery in 2022 is 24% greater than 2021, which will likely lead to greater participation by Area M salmon permit holders in the cod fishery.

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Third, the information solicited by the Chair and presented to the Board also downplayed the extent of the conflict because the conflict is not limited to fishermen who hold permits in the Area M salmon fishery and the cod fishery. For example, some holders of Area M set net permits, who will be directly impacted by Proposal 282, do not hold cod permits but still participate in the cod fishery, either as crew on cod boats for other permit holders or in processing plants, and thus will be prevented from attending the Board meeting.

The fundamental goal of Proposal 282 is to further restrict Area M salmon fisheries. If the changes to 5 AAC 09.365(d) proposed by Proposal 282 are adopted by the Board, open fishing periods in June in the Shumagin Islands and Dolgoi Island Area could be reduced 35% for set netters and 41% for seiners and gillnetters from the current regulations and the Post-June fishery could be reduced 41% from the current regulations for all gear types. It is crucial that Area M fishermen—not just seiners, but all fisherman who participate in the June and Post-June fisheries—participate in the Board process for consideration of Proposal 282. Due process requires that these fishermen be afforded the opportunity to attend the Board meeting in person to protect their rights and their livelihoods, and to provide the Board with data and perspectives that are sorely lacking from the consideration of the Chignik sockeye issue thus far.

It would be contrary to State law and policy to require Area M fisherman to forgo a commercial cod season just to participate in the Board process where the Area M salmon season is being considered. The due process clause of the Alaska Constitution provides: “No person shall be deprived of life, liberty, or property without due process of law.” Alaska Const. art. I, § 7. “This clause requires that adequate and fair procedures be employed when state action threatens protected life, liberty, or property interests” Doe v. Alaska Dep’t of Pub. Safety, 444 P.3d 116, 124 (Alaska 2019). “The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.” Mathews v. Eldridge, 424 U.S. 319, 333 (1976). Due process requires that the Board ensure that Area M fisherman have the opportunity to be heard and to adequately represent their interests during the Board’s consideration of the Area M fisheries issues raised by Proposal 282. Thus, the Board should not schedule consideration of Area M issues at a time when Area M fishery participants will not be able to attend.

We respectfully request that you reconsider our request to re-schedule Proposal 282 for later in March or April to avoid the conflict presented by the current schedule, and that you do so on the basis of accurate and unbiased data. Thank you for your consideration.

Sincerely,



Colby Boulton

Plant Manager

Peter Pan Seafood Co, LLC

www.ppsf.com



December 22, 2021

Alaska Department of Fish and Game
Board of Fisheries
PO Box 115526
Juneau, AK 99811
Via email: dfg.bof.comments@alaska.gov

RE: Comments on Southeast Shellfish and Finfish Proposals January 4-15, 2022

Dear Madam Chair Carlson-Van Dort and Board of Fisheries Members,

Petersburg Vessel Owner's Association (PVOA) is composed of 85 members participating in a wide variety of species and gear type fisheries in state and federally managed waters and businesses supportive to the industry. PVOA members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, crab, shrimp, sea cucumbers, and geoducks.

We appreciate the opportunity to provide these comments on the upcoming meeting. Due to the diversity of our membership, PVOA works hard to remain impartial on allocative proposals between commercial herring and salmon gear types. We do support the *Southeast Alaska Enhanced Salmon Allocation Management Plan* passed by the Board in 1994. You will find we took no position on salmon proposals that we felt would not help provide the fair and reasonable distribution of enhanced fish in the value allocations of (1) seine – 44 - 49 percent; (2) hand and power troll – 27 - 32 percent; (3) drift gillnet – 24 - 29 percent in accordance with the management plan. As you can see in Figure 92-1, the purse seine gear group is right in their range, drift gillnet is slightly above, and troll is below¹.

¹ ADF&G (Alaska Department of Fish and Game). 2021. Alaska Department of Fish and Game staff comments on regulatory proposals, Committee of the Whole—Groups 1–8 for the Southeast and Yakutat Finfish and Shellfish Alaska Board of Fisheries Meeting, Ketchikan, Alaska, January 4–January 15, 2022. Alaska Department of Fish and Game, Regional Information Report No. 1J21-15, Douglas.

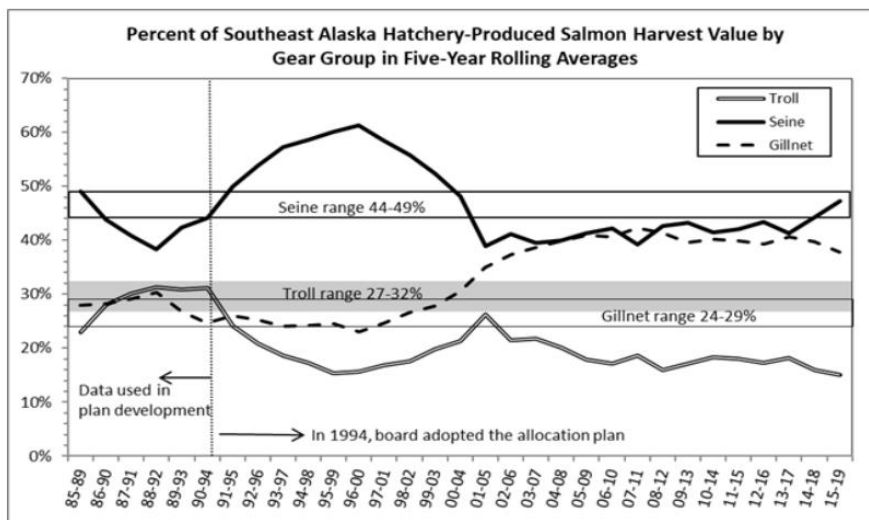


Figure 92-1.–Percent of Southeast Alaska hatchery-produced salmon harvest value by gear group in five-year rolling averages.

Proposal 81 – support

As the primary commercial harvesters of Chinook salmon, the troll fleet has seen severe reductions to their catch limits due to decreases in abundance. We support this proposal as a means to ensure Alaska has the opportunity to maximize the harvest of their allocation of Chinook salmon under the Pacific Salmon Treaty and aid a commercial gear group that has been struggling in recent years.

Proposal 82 – support

PVOA supports aligning the *Southeast Alaska King Salmon Management Plan* with provisions of the renegotiated Pacific Salmon Treaty for 2019–2028.

Proposal 83 – oppose

Managing the sport fishery on a rolling average may result in overages in their harvest allocation in years of low abundance and underages in years of high abundance. Many Chinook stocks throughout Southeast are in low abundance and we have three action plans for Chinook salmon ‘stocks of concern’ in front of the Board at this meeting. We don’t feel it’s an appropriate time to implement a harvest strategy that could lead to overages in a Chinook fishery.

Proposal 97 – oppose

Under the current THA management plans throughout Southeast Alaska, the three gear groups have been closer to their *Enhanced Salmon Allocations* ranges than in the previous decade. PVOA opposes any proposals we felt would offset this balance. Additionally, troll gear is not efficient enough to catch all the fish returning to the Anita Bay THA. We feel it is



essential gillnet and purse seine gear continue to be used to catch returning chum and chinook salmon in a timely manner while the fish are of the highest value.

Proposal 99 – support

This matches the Southeast Cove THA management plan from the last four years. During these years the purse seine fleet was within their allocation established in the *Southeast Alaska Enhanced Salmon Allocation Management Plan*. Additionally, the troll fleet was closer to obtaining their allocation than in the past. Members believe continuing this gear rotation is important to help bring all three gear types into their range.

Proposal 100 – oppose

Members do not support removing gillnet gear as an option to harvest in the Southeast Cove THA. Retaining gillnet as a legal gear type enables flexibility to adjust gear rotations between THA's in the future to manage for enhanced fish allocations in regulation.

Proposal 101 & 103 – oppose

During the permitting process for hatcheries, ADF&G reviews the likelihood of enhanced fish straying into wild systems, and the ability for enhanced fish to be harvested without negatively impacting wild fish. They also strive for run timing differences between enhanced releases and any nearby wild stocks to ensure minimal interaction between enhanced and wild salmon. The Commissioner of ADF&G must sign off on all permitting and has the ability to deny any application if there are any biological concerns.

Proposal 102 – oppose

Members believe a 1:2 drift gillnet to purse seine gear rotation in the Deep Inlet THA would drive the gear groups out of their range.

Proposal 104-109 – support

We support this suite of proposals from SSRAA and ADF&G that would create management plans for THAs/SHAs in Burnette Inlet, Port Saint Nicholas, Carroll Inlet and Port Asumcion to allow common property openings and cost recovery harvest opportunities for these newly established enhanced fish release sites.

Proposal 111 – support

PVOA supports this proposal to allow the gillnet fleet to fish a 6" net during times of restriction for minimum and maximum net size of 6". This would reduce the number of different sized nets a gillnet fishermen would need to buy and simplify regulations.

Proposal 112 – support



The drift gillnet fleet has been unable to harvest their full allocation of coho under the Pacific Salmon Commission Treaty Annex for the Taku River year after year. Members believe the ability to use deeper nets could increase their harvest. This could be limited to Taku Inlet to reduce chances of interacting with other stocks.

Proposal 116 – oppose

Members appreciate the intent of the proposal to reduce waste. However, an opportunity to sell and benefit from the bycatch of Chinook salmon does not incentivize avoidance practices and careful release of Chinook. This is a valuable species currently experiencing low returns in some areas of Southeast. Regulations need to reflect this and encourage avoidance of interactions in some districts.

Proposal 117 – support

Members support this proposal as a means to increase harvest for the troll fleet and bring them closer to their allocation range under the *Southeast Alaska Enhanced Salmon Allocation Management Plan*.

Proposal 119-120 – oppose

Our membership is supportive of the status quo for the net fisheries. These proposals would redefine and open new area to the gillnet fleet. Additionally, ADF&G uses CPUE data from the gillnet fishery to assess salmon abundance and manage openings. Dividing the area and increasing traditional fishing areas would make catch rates incomparable to past rates.

Proposal 121 – oppose

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. Members do not believe there is a safety issue and are sure the commercial and sport fishermen in the area can work together to solve any conflict.

Proposal 122-124 Status Quo

The *Northern Southeast Seine Salmon Management Plan* was developed and amended over several Board of Fisheries cycles to address concerns for incidental harvest of sockeye salmon in this mixed stock area during purse seine openings. A portion of sockeye stocks returning to Chilkoot Lake, Chilkat Lake, Taku River, and Port Snettisham pass this area. PVOA supports these past efforts and asks for no changes.

Proposal 128 – Oppose



Prohibiting an anchor forces gear to be tended the entire time it is being fished. We believe this is the best practice to decrease the chances of predation and interception of unwanted species.

Proposal 143 – support

Members support required inseason reporting of non-resident sport fish harvest to help aid ADF&G in catch accounting and management decisions. Currently the only reporting is the statewide mail survey on a voluntary basis.

Proposal 144 – support

PVOA participates in the International Pacific Halibut Commission and North Pacific Fishery Management Council regulatory bodies and understands the current management difficulties from imperfect catch accounting of halibut. ADF&G's creel survey samples a limited portion of sport halibut fishermen and excludes remote locations. The creation of a logbook program for rental vessels would help with catch accounting and management of the halibut resource.

Proposal 145-148 – support

PVOA members support the prioritization of resident fishermen.

Proposal 154 – oppose

It would be too hard to determine a fish is legal before shooting with an arrow, which is a lethal gear type.

Proposal 156-158 – oppose

There is no documented scientific need for conservation of the Sitka Sound herring stock at this time. The forecasted biomass has increased from 55,637 tons in 2018 to 64,343 tons in 2019 to 212,330 in 2020 and 210,453 in 2021.

The Sitka Sac Roe Herring management plan has several conservation measures built in and historical returns show there is no need to change harvest control rules. In order for the fishery to occur, there must be an available spawning biomass above a 25,000 ton threshold. This threshold has increased from 6,000 in 1977 to 7,500 in 1983, to 20,000 in 1997, and 25,000 in 2009 as the biomass has increased. There is also a sliding Harvest Rate corresponding to abundance².

² Dupuis A., D. Harris, B. Meredith, and P. Salomone. 2021. 2021 Southeast Alaska herring sac roe Fishery Management Plan. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report No. 1J21-04, Douglas.



Proposal 159-160 – support

According to ADF&G comments in RC2, “the department would continue to distribute the commercial harvest by fishing time and area if the department determines that it is necessary to ensure that subsistence users have a reasonable opportunity to harvest herring spawn. Additionally, the department would continue to consider the quality and quantity of herring spawn on branches, kelp, and seaweed, and herring sac roe when making fishery management decisions for both the subsistence and commercial fisheries.”

As the needs of subsistence users would continue to be ADF&G’s first priority, members feel the sited regulations and closed area could be repealed without negatively impacting other users.

Proposal 161 – support

This would match reporting requirements in other subsistence fisheries throughout the state. And it would likely result in more timely collection of basic harvest data according to ADF&G comments in RC2.

Proposal 164 – support

PVOA members support this proposal as a means to change the pace of the sac roe fishery hoping markets and products could be better developed. However, members noted they don’t feel the fishery is dangerous or unable to be managed under the current regulations. ADF&G has successfully managed the fishery in the past under both competitive and industry devised shared quota fisheries.

Proposal 166 – oppose

This issue was considered by the board during the 2015 Southeast and Yakutat Finfish meeting. It was determined that the CFEC administrative area for the Northern Southeast SOK herring fishery includes Sitka Sound. Therefore, this action could only be undertaken by CFEC and not the Board. The Board then tabled the proposal until the Statewide Finfish and Supplemental Issues meeting in 2016 and in conjunction with the Department of Law, asked CFEC to consider changing the administrative area for the Northern Southeast SOK herring fishery to exclude Sitka Sound.

CFEC held a hearing on November 6, 2015 to consider the proposed regulation change. Of the 61 comments received in writing, telephonically, or in person only the author of the original proposal was in favor. Based on the comments received, CFEC took no action³.

³ Twomley, B., 2016. *Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126*. [online] Available at: <https://www.fishgame.state.ak.us/static/regulations/regprocess/fisheriesboard/pdfs/2017-2018/state/misc/kapp/twomley_20160108.pdf>.



Later the Board ultimately took no action on this proposal at the 2016 meeting based on a lack of regulatory authority to allow new entrants into a fishery or to determine who might enter a limited entry fishery.

Proposal 167 – oppose

As previously stated, PVOA strives to remain impartial on proposals that are allocative between our various gear groups in the herring fisheries and supports the status quo.

Proposal 168 – oppose

In the last two years, the Southeast Alaska Herring Summaries have noted significant spawn in Revilla Channel. And ADF&G took the time to sample herring and survey spawn deposition in the area both years.

In 2020, “A total of 11.2 nautical miles (nmi) of herring spawn was observed in State waters, above the 2010-2019 average of 4.2 nmi. Herring samples were obtained for age, weight, and length (AWL) analysis and a spawn deposition survey was completed.”⁴

In 2021, “Aerial surveys were conducted from March 18 through April 7, with herring spawn first observed March 26 on Double Island. Spawning continued in Revilla Channel through March 30, with additional spawn events observed on April 5 and April 6. Spawn was observed on Double, Cat, Dog, Village, and Mary islands with the most intense spawn occurring on the western shore of Cat Island. The total cumulative spawn mileage of 7.9 nautical miles (nmi) in State waters was above the recent 10-year (2011–2019) average of 5.3 nmi. Herring samples were obtained for age, weight, and length (AWL) analysis and a spawn deposition survey was completed.”⁵

This area has not been commercially fished since 1998, but recent years show there may be potential for a fishery in the future.

Proposal 169 – oppose

Many herring stocks throughout Southeast are experiencing an upward trend. From the 2021 Southeast Alaska Herring Summary previously cited, in West Behm Cannal “the total cumulative spawn mileage of 8.2 nmi was above the recent 10-year average of 5.3 nmi.”

⁴ Alaska Department of Fish and Game, 2020. *2020 SOUTHEAST ALASKA HERRING SUMMARY*. Juneau, AK 99811-5526. [online] Available at: <<http://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1155591159.pdf>>.

⁵ Alaska Department of Fish and Game, 2021. *2021 SOUTHEAST ALASKA HERRING SUMMARY*. Juneau, AK 99811-5526. [online] Available at: <<http://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1265317815.pdf>>.



This area has not been commercially fished since 2011, however, PVOA members are opposed to permanently closing herring fisheries. These areas have been closed during low abundance and ADF&G comments note they wouldn't be reopened unless the stocks meet threshold for several years and extensive aerial and sonar surveys were conducted to ensure an adequate biomass.

Proposal 172 – support

PVOA members support changing the shrimp pot season to May 15 through July 31 to avoid harvesting shrimp during egg hatching. However, members have concern over how this would be implemented. Would there be a Fall 2022 fishery followed by a Spring 2023 fishery as we transition to new season dates? Or would the fishery be closed the entire year in 2022 and not open until the Spring of 2023?

Proposal 175 – oppose

The shrimp pot fishery has faced more changes in gear regulations in the past several decades than most fisheries in Southeast, increasing the costs of participation. PVOA prioritizes flexibility in gear regulations to allow for innovation. Not adoption of regulations that force the whole fleet to fish the way one participant prefers.

Proposal 176 – oppose

ADF&G has been able to effectively manage the fishery under the current pot limits. There are several proposals that would change the shrimp fishery drastically, such as changes to the season dates. Members ask the Board consider the cumulative impacts of adopting several changes to the fishery in one cycle.

Proposal 177-179, 200-201, 204-208, 210 – oppose

PVOA opposes the various proposals seeking to close waters. These proposals lack sufficient explanation of a biological concern and without a documented scientific need for conservation, we do not support limiting access to fisheries through area closures. PVOA has confidence in the Emergency Order authority given to the department to open and close fisheries in response to changes in abundance.

Commercial fisheries are open for a limited number of days a year while subsistence and personal use is open all year for Dungeness crab and shrimp.

The Dungeness crab fishery has 17 area closures around communities. ADF&G staff comments state "closing additional areas to commercial fishing for Dungeness crab will result in increased density of gear in the areas that remain open, potentially increased gear loss, and increased potential for localized depletion."

Proposal 182 – support



Splitting the District 15 GHR for shrimp into District 15 East and District 15 Remainder would match management practices since 2009 that have been effective.

Proposal 184 – support

PVOA supports clarifying regulations plainly to state that longlining shrimp pots is legal in the sport fishery.

Proposal 190 – support

The 200,000 pound legal male biomass threshold in regulation to trigger a commercial fishery is an economic threshold chosen by the industry in 2002. Since then, prices for king crab have increased and fewer fisheries have been conducted.

PVOA submitted this proposal as a way to create a slow, manageable fishery to allow the harvest of red king crab at a biological threshold lower than the economic threshold of 200,000 pounds of legal male crab. We used 88,500 pounds as a placeholder to be substituted. After the 2018 Southeast and Yakutat meeting when we submitted a similar proposal, ADF&G agreed to work on determining a biological threshold they felt comfortable harvesting at.

In writing this proposal it was important to permit holders to maintain the competitive fishery when abundance returns to a level above 200,000 pounds of legal male crab.

In the last 18 years, the commercial fishery has been prosecuted three times. Red king crab mature at 6 years and do not reach legal size until 8 years. The last fishery occurred five years ago in 2017. Members are looking for a way to harvest some of these older crab that would otherwise die of old age resulting in missed economic opportunity.

Proposal 191 – support

In January of 2020, the Alaska Legislature debated cutting funding for the Southeast Alaska red king crab assessment from the Commercial Fisheries Division of the ADF&G budget. In testimony to the House Finance Subcommittee on the ADF&G Budget on January 28th, ADF&G noted they would be forced to close the personal use and commercial red king crab fishery without the survey.

PVOA submitted this proposal as a way to prosecute a conservative 3-7 day fishery, outside of 11-A, biennially based on a comparison of historical fishery CPUE. Members felt this would be the best way to determine stock status without a survey. Members also didn't want to disrupt the Section 11-A personal use fishery and hoped that fishery could continue to be conducted in a similar manner.

Proposal 192 – support



On January 16th, 2020 15 permit holders, petitioned ADF&G Commissioner Vincent-Lang asking he review under 5AAC 34.035 the decision to close the Northern Area, East Central, Mid-Chatham, and Lower Chatham for the 2020 season. Two industry associations, and three processors sent a similar letter asking for more transparency in management decisions for golden king crab.

This is a fishery dependent on commercial logbooks, daily call-ins to managers, port sampling, and personal use harvest reports as the only available data for determining the status of the stocks. PVOA has continually asked all areas open at least briefly in a season, reasoning this provides ADF&G with a free survey and prevents gaps in the data used for management.

PVOA submitted this proposal as a placeholder, hoping to work with ADF&G to write a new management plan for golden king crab to be substituted for this language. This proposal was our first attempt and at subsequent ADF&G King and Tanner Task Force meetings, staff could not provide feedback on it until the December 3, 2021 meeting. In the meantime, they did present industry with a new harvest strategy for golden king crab that uses a comparison of recent and historical CPUE from 2000-2017.

ADF&G's draft harvest strategy has clear decision rules to predict how a GHL will increase/decrease, when an area will be closed, and when it will reopen. Industry appreciates the transparency of this draft harvest strategy, but **PVOA does not recommend substituting ADF&G's draft golden king crab harvest strategy for this language to make it regulation.** We feel it needs more time to be adjusted through the King and Tanner Task Force process.

Proposal 193 – support

This area was open to commercial harvest of golden king crab prior to the 2005 Southeast and Yakutat Shellfish meeting when areas were re-drafted and re-named. PVOA is not asking to increase the GHR for the area, just to increase the size of the area the GHR can be harvested from. ADF&G comments note this area contains substrate and depths where golden king crab reside.

Proposal 195 & 197– support

These proposals have the ability to extend the time some areas are open for the harvest of Tanner crab. PVOA supports redefining areas without participation as 'exploratory' and extending time allowed to fish in 'exploratory' areas to provide opportunity for anyone willing to try fishing off the beaten path in these non-traditional areas.

During the December 3, 2021 ADF&G King and Tanner Task Force meeting it was agreed that the language 28 days or April 1 would be more appropriate language for Proposal 195. This would prevent the Tanner season from extending into April when they molt and mate.

Proposal 196 – oppose



PVOA members oppose the reduction of pots in the golden king crab fishery from 100 to 80. As mentioned in Proposal 190, ADF&G has used a harvest strategy for the last two seasons that compares CPUE data to historical CPUE from 2000-2017. Reducing the pot limit at this point would degrade the data and make it less comparable.

We understand ADF&G's concern for 100 pots and the amount of time they need to advise fishermen of a closure. Fishermen don't have to get all their gear out of the water by the closure, just into a non-fishing configuration. Meaning no bait and the doors tied open.

Fishermen can currently haul 100 pots in a day. A reduction would lead to double hauling some gear in a day giving less time for small crab to filter out on the bottom and increasing handling.

Proposal 198 – oppose

Currently the golden king crab and Tanner crab fishery opening dates are tied together. Changing the Tanner fishery start date would complicate the fair start between Tanner and golden king crab fishermen, especially in the case of fishermen who hold both permits.

The current regulations support season openings during the most favorable tides, PVOA does not support a fixed date to prevent gear loss during large tides.

Proposal 202-203 – support

PVOA supports reopening a portion of the closed area around Tenakee and the closed area near Elfin Cove.

Aside from Kasaan, the closure in Tenakee Inlet is one of the largest closures around a community. As the proposer noted, there are only 150 residents in Tenakee, all able to subsistence fish in the entire inlet 365 days a year. Members support retaining the closure around the town and opening the Kadasham flats for commercial harvest.

ADF&G staff comments in RC2 note Elfin Cove has about 60 residents that harvest an average of 4.99 pounds of crab per capita. There is no need for an area closure to ensure they are able to maintain harvest at these levels.

RC2 also notes there are no conservation concerns for either area.

Proposal 211 – support

PVOA support opening the Sitka Sound Special Use Area to commercial Dungeness fishing for the entire fall season from October 1-February 28. The last three months of the Fall season during which the Special Use Area is currently closed is in the winter. We predicted participation would be low due to winter weather, the area being open to the ocean, and the tendency for processors to close before December. Crab also fish slower when the



water is colder. However, this could be an opportunity for a small boat to haul gear occasionally when the weather allows and direct market them from the dock.

Proposal 214 – oppose

In the last three years there has been an increased amount of fishermen buying square shaped Dungeness pots under the 50” diameter and 18” height requirement from places such as Custom Crab Pots⁶. Some fishermen have reported they stack better and are safer on deck. PVOA believes fishermen need the ability to adapt in fisheries and are opposed to regulations we feel stifle innovation. The fishery has been well managed for decades under the current size and pot limits.

Proposal 216 – support

In 2021, the International Pacific Halibut Commission chose longer fishing dates than in the past with a start date of March 6th and end date of December 7th. The Federal sablefish Individual Fishing Quota (IFQ) fishery matches the IPHC dates each year. Members support this proposal that would extend season dates in the Southern Southeast Inside sablefish fishery into December, creating a closer match to other longline fisheries and providing more time to harvest.

Proposal 220 – support

Since 2017, many PVOA members have switched to fishing longline pots or a combination of hooks and longline pots for sablefish in both the Federal sablefish IFQ fishery and Southern Southeast Inside sablefish fishery. For members that prefer to fish with pots and participate in multiple sablefish fisheries, it would be convenient to not have to switch gear.

Proposal 225 – oppose

During the 2018 Southeast and Yakutat Board of Fisheries meeting, the Board established a nonresident annual limit of eight sablefish throughout SEAK. PVOA is supportive of the effort that went into this allocative decision and supports the status quo.

Proposal 229 – oppose

ADF&G comments note that under this proposal, the sport fishery allocation in Central Southeast Outside (CSEO) would likely be exceeded. This would also complicate regulations by having a separate limit in CSEO from the remainder for NSEO.

Thank you for your time and dedication in considering public comments. PVOA will have representatives present throughout the January meeting. We are happy to answer any question in person, or by email at: pvoa@gci.net.

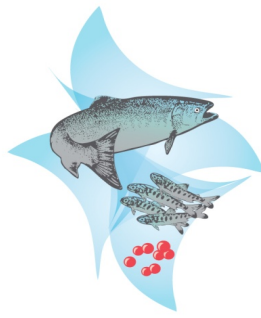
⁶ <https://customcrabpots.com>



Respectfully,

Megan O'Neil

Megan O'Neil
Executive Director



Prince William Sound
Aquaculture Corporation
DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD



PC292
1 of 1

December 21, 2021

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC Opposes Proposals 101 and 103

Dear Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization, employing 53 full-time staff members and 75 seasonal workers and operating an annual budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 750 commercial salmon fishing permit holders and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors.

Proposals 101 and 103 are nearly identical in scope and intent as proposals 49-53 submitted at the PWS/Upper Copper and Upper Susitna Rivers Finfish and Shellfish meeting November 30th – December 6th. PWSAC submitted detailed, written comments (PC186) and provided oral public testimony in opposition to proposals 49-53. An overwhelming number of Alaskans made their voices heard in opposition to the proposals while the proposer provided no public written or oral comment. The Board of Fisheries rejected and took no action on proposals 49-53.

PWSAC supports comments from Southeast Alaska Hatchery Operators regarding proposals 101 and 103 at the Southeast and Yakutat Finfish and Shellfish Alaska Board of Fisheries meeting. PWSAC opposes proposals 101 and 103 and respectfully requests **that the board reject proposals 101 and 103.**

Sincerely,

Geoff Clark
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD**

P.O. Box 1110 · Cordova, Alaska 99574
P. 907 424 7511 · F. 907 424 5508

www.pwsac.com



PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

1900 W Nickerson St., Ste. 320 ■ Seattle, WA 98119 ■ Tel: (206) 283-7733 ■ Fax: (206) 283-7795 ■ www.psvoa.org



PC293
1 of 3

December 21, 2021

VIA E-MAIL

Marit Carlson-Van-Dort, Chair
Alaska Board of Fisheries
P.O. Box 115826
Juneau, AK 99811

Re: Support Proposals: 98, 99, 100, 102, 122, and 123
Oppose Proposals: 101, 103, 124, 156, 157, and 158

Dear Madam Chair Carlson–Van Dort and Board of Fisheries Members:

The Purse Seine Vessel Owners Association (“PSVOA”) respectfully submits the following comments in connection with the above-referenced proposals before the Board at the upcoming Southeast Alaska and Yakutat finfish and shellfish meeting in Ketchikan. PSVOA is a commercial fishing organization having members that participate in the salmon purse seine and other commercial fisheries in Southeast Alaska.

Support Proposal 98

PSVOA supports this proposal which would change the ratio of gillnet to purse seine openings in the Anita Bay THA from 2:1 to 1:2. 5 AAC 33.383 (d)(3) states the ratio of gillnet to purse seine openings for the 2018-2020 fishing seasons shall be 1:1. Rather than revert to the gillnet to purse seine opening ratio of 2:1 as stated in (d)(4), a gillnet to purse seine opening ratio of 1:2 is necessary to achieve the purse seine allocation of enhanced salmon as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.

Support Proposal 99

PSVOA supports this proposal which would establish a fixed fishing schedule in the Southeast Cove THA for purse seines and trollers whereby the seine fleet would fish on Sunday and Thursday and the troll fleet would fish the remaining days of the week. Gear group openings are currently determined by the department. This proposed fixed schedule is necessary to achieve the purse seine allocation of enhanced salmon as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.



Support Proposal 100

PSVOA supports this proposal which would exclude gillnets from fishing the Southeast Cove THA. This proposal is necessary to achieve the allocation of enhanced salmon among gear groups as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.

Support Proposal 102

PSVOA supports this proposal which would change the ratio of gillnet to purse seine openings in the Deep Inlet THA from 2:1 to 1:2. 5 AAC 33.376 (b)(1)(D) states the ratio of gillnet to purse seine openings for the 2019-2021 fishing seasons shall be 1:1. Rather than revert to the gillnet to purse seine opening ratio of 2:1 as stated in (b)(1)(B), a gillnet to purse seine opening ratio of 1:2 is necessary to achieve the purse seine allocation of enhanced salmon as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.

Support Proposals 122 and 123

PSVOA supports Proposal 122 which would remove the sunset clause regarding the 15,000 sockeye salmon harvest limit for purse seines in District 12 north of Port Madsen during July. PSVOA also supports Proposal 123 which would reduce the time the sockeye salmon harvest is subject to the 15,000 harvest limit from July 22 to July 15. The Northern Southeast seine salmon fishery management plans are set forth in 5 AAC 33.366. The 15,000 sockeye harvest limit in section (a)(2) is limited to 2021. PSVOA supports the idea of making the 15,000 sockeye harvest limit permanent. Shortening the time period the sockeye harvest limit is in place from July 22 to July 15 would provide the purse seine fleet the ability to access northern migrating pink salmon in years where the pink abundance is sufficient to provide harvest opportunity.

Oppose Proposals 103 and 105

PSVOA strongly opposes these anti-hatchery proposals. Both proposals are nearly identical to Proposals 49 – 53, which were recently rejected by the Board at the recent Prince William Sound finfish meeting in November. In permitting hatchery operations, the Alaska Department of Fish and Game (ADF&G) already considers many of the concerns raised in these proposals, including the need to minimize interactions between hatchery origin and wild salmon and the need to ensure harvest practices targeting hatchery produced chum salmon do not negatively impact wild fish.

The Alaska Hatchery Research Project is an ongoing research project designed to investigate the question of whether straying of hatchery origin salmon adversely impacts wild salmon stocks, and to what degree. At the conclusion of the study, the results will be published and peer reviewed. The results and conclusions derived from the study will provide ADF&G with an objective assessment of wild/hatchery salmon interactions. Any action taken by the Board to require reductions in hatchery production at the present time would be premature and not based on best available science. In sum, PSVOA respectfully requests the Board **reject** Proposals 103 and 105.

Oppose Proposal 124

This proposal is related to Proposals 122 and 123 discussed above. However, this proposal would extend the wild sockeye harvest limit date from the current date of July 22 to July 31.



Extending the harvest limit date through the end of July is not needed for sockeye conservation and unnecessarily restricts the seine fleet's ability to access northern migrating pink salmon in years where the pink abundance is sufficient to provide harvest opportunity.

Oppose Proposals 156 -158

All of these proposals seek to reduce the commercial harvest opportunity for the Sitka Sound commercial sac roe herring fishery. The Sitka Sound herring stock has been the largest and most stable stock in Southeast Alaska for decades. Proposal 156 changes the current Sitka Sound herring harvest rate strategy, which has been in place since 1983 and revised in 1998. In its comments, ADF&G correctly points out that this is an allocative proposal rather than a proposal based on the need for additional conservation measures. Moreover, the current harvest strategy in place since 1998 is based on the best scientific information available for Sitka Sound and contains conservation provisions that are beneficial to herring populations and the ecosystem.

Proposal 157 contains a complicated method of calculating the guideline harvest level (GHL) for the Sitka Sound commercial sac roe fishery, which would directly reduce commercial harvest opportunity in the fishery. The purported purpose of the proposal is to reduce the risk of overharvesting the older 5+ age class. However, as noted by ADF&G in its comments, calculating the GHL as proposed would only reduce the overall harvest rate, but it would not necessarily change the age composition of the harvest in the fishery. Moreover, the current harvest strategy already accounts for varying exploitation rates between different age classes.

Proposal 158 seeks to close the Sitka Sound commercial sac roe fishery if the proportion of herring age 5 and above is less than 20% of the total herring spawning biomass. As mentioned by ADF&G in its comments, applying this criterion from 1980 – 2020, the fishery would have been closed in 6 of these years, with an average annual ex-vessel value loss of \$1.9 million. According to ADF&G, it does not have the resources to conduct the large scale sampling program that would be required to determine age composition. As mentioned above, the current harvest strategy already takes into account varying exploitation rates between different age classes.

Thank you for your consideration of PSVOA's comments regarding these proposals.

Very truly yours,

/s/ Robert Kehoe

Robert Kehoe, Executive Director
Purse Seine Vessel Owner's Ass'n

Submitted By
RANDY KEAVENY
Submitted On
5/26/2021 8:33:11 AM
Affiliation



PC294
1 of 2

Phone
19077387371
Email
sundari@acsalaska.net
Address
113 DARRIN DRIVE
Sitka, Alaska 99835

I sent this message out a few weeks back and got nothing back....

I write you AGAIN....concerning the ever growing charter fleet in Sitka....what last years turmoil has shown us is that when the charter fleet is not present in the Sitka area the fishing is back to its 1990s stock....this year...already....total opposite and we just started....

Why...if you do not live in Alaska can these charter companies come up here....bring in thousands of people.....and then leave with there money and crews and profits and fish....etc etc etc.....

Last year was the first year in many that we were catching fish in places we haven't since the 90s...the reason...no pressure from the 50+ charter boats....this is PURE GREED!!!! Nothing else....they are never boarded like the residents are....they do not follow the rules and regs on the water....there crews are 20 yr old kids BARELY trained to handle an emergency situation....

With covid being such a big thing now a days....why are the crew members of these lodges allowed to fish all day with clients who may or may not have been tested/vaccinated....get back in to the docks....then allowed to go out bar hopping or to restaurants in town....possibly passing covid onto the local customers....the serving staff....who in turn bring it home to there families

If you are a board that cares about the communities of SE Alaska....or Alaska as a whole....this should be looked into....

I plan on passing this onto all the local newspapers that will take and print it....

I am just saying what everyone else in the town is thinking....but afraid to put pen to paper...

The fact that they come into our communities for 90 days.....if that....then leave without contributing to our towns infrastructure is a slap in the face to all of us

Submitted By
Randy
Submitted On
6/1/2021 9:43:41 AM
Affiliation



PC294
2 of 2

Phone
9077387371
Email
sundari@acsalaska.net
Address
113 Darrin Drive
Sitka, Alaska 99835

i write you AGAIN....while i know that wild stock runs of salmon are not accurately forecast especially by the state....this time last year...fishing in Sitka was back to its 90's level...this year...TERRIBLE....unless you are one of the 100+ charter boats fishing out at the cape where they are stopping the fish from coming in....you might as well allow gill nets or seiners to fish out there...its that bad...during the covid outbreak last year..no or very few charter boats fishing here...this year...back at it full force...and us the RESIDENTS...the ones you are supposedly looking out for...are struggling to find 1 or 2 fish...im not a great fishermen but i can fill my freezer for my family when i need to....but with the price of fuel rising...it is becoming very expensive...

you guys are suppose to regulate this...but it has gotten out of control...6 lines per boat X 30 boats...and thats an underestimate... 180 lines in the water....every day...killing numerous fish...

enforxement...thats a laugh....there is no one out there regulating any of these charter boats...

its time you take a closer look at these charter lodges.....before all OUR resources are gone....

Submitted By
Raymond Douville
Submitted On
12/13/2021 4:05:29 PM
Affiliation



PC295
1 of 4

I oppose proposal 83.

Each user group was allocated a certain amount of king salmon during the last treaty negotiation and each user group should be held responsible to stay within their allocation.

On years of low abundance, the troll fleet cannot afford to give up any of their king salmon allocation. The troll fleet already deals with very short openings and limited opportunity for king salmon. Proposal 83 would only further harm the troll fleets' ability to sustain its needs.

The charter/sport fleet continues to grow and have longer seasons. The king salmon abundance has been on the lower end in recent years.

It is very likely that proposal 83 will allow the charter/sport fleet to exceed their 20% allocation on most years and leave the troll fleet coming up short on their share.

The charter/sport fleet thinks this proposal is fair, but only because they stand to gain fishing opportunity on most years. This proposal would be unfair to the troll fleet.

Submitted By
Raymond Douville
Submitted On
12/13/2021 4:58:12 PM
Affiliation



PC295
2 of 4

I support Proposal 217

Proposal 217 would give the commercial salmon troll fleet a fair bycatch allocation in the Southern Southeast Outer Coast (SSEOC) area.

When comparing the bycatch allocation in SSEOC to other outside water areas, SSEOC is far lower by percentage.

Retention of lingcod for the commercial salmon troll fishery in the Southern Southeast Outer Coast (SSEOC) area has closed before the end of the Summer troll season in 7 of the last 10 years. The data shows that the commercial salmon troll fishery is using their lingcod allocation and that they are under allocated on lingcod.

This is a proposal in which no one will lose any opportunity to harvest lingcod. Proposal 217 would allow the troll fleet a little more opportunity to retain lingcod during the summer salmon troll fishery

and

still leave plenty of opportunity for lingcod bycatch in the commercial groundfish jig fishery based on its harvest history over the last 15-20 years. As stated in the proposal:

“From 2003 through 2019, a total of only 79 lbs. of lingcod has been landed in the commercial groundfish jig fishery in the SSEOC area.”

The facts are clear in showing this is a fair proposal that would be harmless to any other gear group. Additionally, it would positively impact a commercial salmon troll fleet that has lost opportunities elsewhere.

Submitted By
Raymond Douville
Submitted On
12/18/2021 7:17:55 PM
Affiliation
Commercial fisherman



PC295
3 of 4

I do not support proposal 177.

Proposal 177 is poorly written and difficult to understand what and how much area would be closed to commercial fishing for shrimp if this proposal were to pass. From what little information I can gather by reading the proposal, it seems that this proposal may be asking to close an area that has historically been a commercial fishing area.

For those reasons, I do not support proposal 177.

Submitted By
Raymond Douville
Submitted On
12/19/2021 3:15:51 PM
Affiliation
Commercial Fisherman



PC295
4 of 4

I support proposal 144

The unguided non-resident sport fishing effort and harvest is putting increased pressure on our salmon and halibut resources. Bare boat charter/rentals are becoming a more popular way for non-residents to harvest more fish. Much of the fishing that takes place this way is unmonitored and unaccounted for. There needs to be a catch-reporting requirement for these types of operations for both salmon and halibut so the harvest can be accounted for and limited.

This an issue where local subsistence, charter and commercial fishermen all agree that accountability and lower bag limits for these operations is a must.

Currently there is no limit on the number of unguided non-resident charter/rental boats that are allowed. With a growing sport fish harvest of both salmon and halibut, due to these types of operations, it also has the potential to interfere with resource allocation between gear groups.

For these reasons, I support proposal 144.

Submitted By
Raymond Merryman
Submitted On
12/18/2021 2:36:33 PM
Affiliation



PC296
1 of 1

Phone
4843786363
Email
ramerryman@comcast.net
Address
1302 Sawmill Creek Rd
Spc 39
Sitka, Alaska 99835

To State Board of Fish & Game

My name is Raymond Merryman. I live in Sitka and have commercially Dungeness crabbed out of Sitka for the past 4 years.

I strongly oppose Proposal 201. If this proposal was approved it would take away very valuable crabbing grounds that myself and local crabbers utilize. Pushing our crabbing grounds farther away from Sitka is not in the best interest of anyone. Having the area closed for commercial operations but still open for recreational use does not make sense as the recreational crabbers already have a lot of grounds close to Sitka that are restricted for their use only. Expanding that restricted area comes at the detriment to commercial fishermen and crews that live and are a large part of Sitka's economy. The area should remain open to all that want to participate.

Sincerely,

Ray Merryman

Submitted By
Ric Berkholtz
Submitted On
11/16/2021 8:55:39 PM
Affiliation



PC297
1 of 1

Phone
6128340207
Email
ricberk7@gmail.com
Address
3927 Adams Lane NE
Seattle, Washington 98105

I am an environmentally conscious individual and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across Southeast Alaska. I support proposals 156, 157, and 158. We need to protect the herring to ensure the survival of Washington state's critically endangered Southern Resident Orcas. Our orcas depend on Columbia River Chinook salmon which rear in Southeast Alaska where their main food source is SE herring. Please prioritize protecting the herring for future generations!

Thank you

Submitted By
Richard Curran
Submitted On
12/17/2021 8:31:28 AM
Affiliation
self



PC298
1 of 3

Oppose Proposal 225

Dear Chairman and Board Members:

I am a longtime resident of Southeast Alaska. I own and operate a longline vessel out of Sitka and own a NSEI Sablefish Permit and SE Sablefish IFQ. I have been fishing sablefish on Chatham since 1982. I have invested heavily in these resources and as a year-round resident of Sitka I invest heavily in our local economy. I have served on the Sitka Fish and Game Advisory Committee for over 10 years and am well aware of the various sides of these issues.

I oppose proposal 225 because it greatly increases the nonresident bag and annual limit of sablefish based on commercial ABC increases but does not reduce these limits when biomass falls so it is not abundance based management as suggested by the proposer. Also the proposer suggests a lower starting level of commercial GHL than was used in when bag limits were first established and would jump the bag limit up with small increases in GHL. The current GHL for Chatham strait is only 24% of what it was when the equal quota share system was imposed for conservation in 1998 and the commercial GHL has been below 1.1 million pounds between 2009 until 2020. As detailed by ADFG in their 2021 NSEI sablefish annual harvest objective news release NSEI sablefish spawning stock biomass remains at suppressed levels compared to the 1980s and 1990s and the recent recruitment events are fish that are not fully mature. In 2021, the Department imposed additional conservatism to management of the commercial fishery by imposing a 15% limit on any annual increases in commercial GHL. The non-resident sport fishery should be managed as conservatively. Staff comments indicate that a 6 fish bag limit would have increased the nonresident catch by as much as 36% each year with no accounting for future growth in angler numbers. The sport catch is taken off the top along with estimated bycatch and release mortality in the commercial fisheries before the annual GHL is set, in effect giving sportfish an unintended priority over the commercial fishery already. Since bag limits were implemented in 2009 the nonresident catch increased 481% by 2018 and accounted for 96% of the total recreational catch. During this same time period the commercial NSEI GHL declined below 2009 levels, hitting a 39% reduction in 2016. In 2021 we are finally back to the 2009 level of 1.1 million GHL but well below historic catch levels.

Annual limits for non-residents are a routine management tool to provide opportunity while still placing value on a resource. In 2018 96% of the sport sablefish catch was taken by non-residents. I continue to believe that an 8 fish annual limit is generous and provides reasonable opportunity for nonresident anglers to enjoy sablefish. There is no limit on charter vessels fishing for sablefish and there is an increasing unguided nonresident harvest as well. If you do decide to make bag and annual limits tied to abundance they should go down when the GHL is reduced as well. Further, any increase in bag or annual limits should be based on a larger increase in GHL than proposed—500,000 lb change for a 1 fish annual limit change up or down. I oppose proposal 225 and support status quo for this regulation.

Because of Covid I am unable to attend the meeting and serve on the Groundfish Committee but would like these comments considered in the discussion at that time.

Thank you,

Richard Curran

Submitted By
Richard Curran
Submitted On
12/20/2021 7:43:20 AM
Affiliation
self



PC298
2 of 3

Groundfish: Oppose 215 and 216

Dear Chairman and Board,

I am a NSEI permit holder having fished in Chatham for sablefish since 1985. I oppose these two proposals that lengthen the NSEI sablefish season. Extending the season to the IFQ opening would greatly compromise the ADFG assessment surveys and is likely to bring sperm whales into Chatham. The Department manages the commercial fishery very conservatively and the EQS for this fishery can easily be harvested in a day or two of fishing. We haven't spent more than 2 days fishing our quota in decades and it takes very little gear to catch an EQS. The quotas are still at low levels and the Department has a policy to limit annual increases in GHL to no more than 15% so they will stay low. There is no reason to have a more extended season than the current season – there is plenty of time to catch the fish, even at the end of the season. Early in the season sablefish could still be spawning and I don't think it is a good idea to have constant gear pressure on the stock if it isn't necessary.

I agree with ADFG comments to oppose these proposals.

Thank you.

Submitted By
Richard Curran
Submitted On
12/22/2021 12:40:33 PM
Affiliation
self



PC298
3 of 3

Oppose 83

Dear Chairman and Board

I first began commercial salmon trolling in 1977 and have held a troll permit since 1980. This proposal opens the flood gates to reallocate king salmon from the commercial troll fishery to charter given the fact that nonresident angler numbers continue to increase and in fact the State actively encourages this increase in nonresident anglers. It would not maintain the 80:20 split and instead would result in a major re-allocation of the limited Chinook quota to the charter industry. The proposal would eliminate inseason management of sport fish king salmon which would place all of the burden on commercial trollers to keep within the US allocation. This reallocation would seriously hurt the predominately resident commercial troll fishery and would give nonresident and charter fishermen priority over commercial trollers in low-abundance years. There is no guarantee that given climate impacts on ocean survival king salmon will return to high abundance numbers any time soon. This proposal represents a concerted effort to reallocate king salmon from commercial to sport and attempts to minimize impacts on charter fishing while once again putting the conservation burden on commercial fishermen.



From: [Rob Endsley](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: King Salmon Management Comments
Date: Wednesday, December 22, 2021 12:56:19 PM

Marit Carlson Van Dort, Chairman

Alaska Board of Fisheries

1255 W. 8th Street
Juneau, AK 99811-5526

Re: King salmon management proposal 83

Chair Carlson-Van Dort and members of the Board,

My name is Rob Endsley and my wife and I own and operate Prince of Wales Sportfishing in Craig, Alaska. Our business has operated out of Craig for over twenty years and the dollars we bring into our small coastal community brings much needed sales tax revenue to the City of Craig. Sportfishing is our primary source of income and helps support my family as well as the community. We employ many locals in our business and we spend our money in town at the local outboard maintenance shop, grocery store, tackle shop, fuel dock, etc..

King salmon are critical to our operation all summer long and when our guests book a trip with us the first question they ask is, "Will king salmon be open?" If the answer is "No" many of them simply won't spend their hard-earned money to fly all the way to Alaska and fish with us. This is especially true under the current Covid atmosphere where guests are weighing the fishing benefit against the risk of travel and all the hoops they need to jump thru to get to Alaska.

Our guests that have experienced in-season king salmon closures the last few years have often declined to rebook their dates or asked to move to an earlier date with a better chance of king salmon retention being open. We would love to accommodate them earlier, of course, but there is only so much space. I know the other lodges on Prince of Wales Island face the same struggle.

I support Proposal 83 that keeps workable regulations in place during years of low abundance and strives to avoid in-season management. It would be much better for customers to have similar regulations year after year than to liberalize limits in high abundance years and get strict limits or closures in low abundance, or to close the fishery unexpectedly. It's hard to market and keep people traveling to our businesses and communities with unstable regulations. Proposal 83 also does a better job of balancing resident and non-resident limits.

Proposal 83 also incorporates the core objectives that have been used for years to manage the non-resident king salmon limits that are vital to keeping the charter industry alive in Southeast Alaska. Two of these objectives that have been recently abandoned by the department are; no in-season management, and averaging the sport harvest to provide predictability in years of



low abundance. With these two objectives back in place we could have some stability in our fishery again.

Thank you so much for the time you put into working on our fishery issues and I kindly thank you for taking my request into consideration.

Rob Endsley, Prince of Wales Sportfishing

Rob Endsley
Prince of Wales Sportfishing
Craig, Alaska
www.princeofwalessportfishing.com

Submitted By
Robert Jahnke
Submitted On
11/13/2021 12:03:13 PM
Affiliation



PC300
1 of 1

Phone
9072478207
Email
bobkrisktn@kpunet.net
Address
PO Box 991
Ward Cove, Alaska 99928

proposal # 148 , I am totally against this proposal that is presented by sport charters. I've been involved in Troll and sport personal use fisheries for over 50 years. In 1977 I held the world record Chum salmon well before the hatcheries here produced them. The sport charters should have been commercialized 40 years ago but our politicians here in Alaska blocked it. To compare sport charters to commercial trollers is wrong. The board of fisheries responsibility hinges on protecting the personal use Alaskan resident over the tourist industry. We have lost important rock fish, two months of putting king salmon on the table for our families [04/1-06/15], and the ability to catch halibut because of the millions of nonresident tourist coming to Ketchikan. To allow the large expansion of a terminal hatchery area for the sake of tourism is criminal. When I started personal use fishing in the early '70s there was only one resort on this Island, now there is at least 4 large resorts and at least 5 micro lodges catering to tourists. Please protect my children and grandchildren for the future by regulating the people who care much less for the Alaskan year round resident. Thank you

Submitted By
Robert Suarez
Submitted On
12/22/2021 3:58:44 PM
Affiliation
Charter Business Owner



PC301
1 of 1

Phone
9077386382
Email
robertisuares@yahoo.com
Address
109 Donna Dr
Sitka, Alaska 99835

My family and I are charter business owners in Sitka, Alaska. I have been in the charter business for 24 years as an owner and operator, and have lived in Sitka for 31 years. Our family business is based on salmon and halibut day charters out of Sitka. We employ a captain, and the business provides day trips for over 100 days each season taking 4-6 guests each day. Guests stay in Sitka for 4-6 nights, providing an economic benefit to the local businesses (hotels, restaurants, and local shops). Our business is highly dependent on the king salmon opportunity- **we support proposal 83**. We support keeping resident access open, but we don't support inseason closures or annual limits that are too restrictive that would keep anglers from coming to Sitka to fish. Liberalized limits at high abundance seasons don't compensate for seasons with closures or too little opportunity for anglers. Thank you for your time.

Submitted By
Robert Sylvester
Submitted On
12/22/2021 12:14:54 PM
Affiliation
citizen



PC302
1 of 1

Phone
206 387-5840
Email
hikeak@yahoo.com
Address
PO Box 22487
residence 128 Dixon St Apt B Juneau AK
Juneau, Alaska 99802

As a former troller and 40 year resident of Southeast Alaska I have watched the decline of herrng stocks and the apparent unwillingness of the powers that be to address the issues surrounding herring, a noble fish that is the diet of so many fish important to our other fisheries. It is time we act like herring are a integral part of our food web and not just another commodity.

I support Herring Proposals 156, 157 and 158.

I oppose Herring Proposals 159, 160, 161, 163, 164, 165 and 166.

Thank you!

Submitted By
Rochelle Miller
Submitted On
12/20/2021 3:12:51 AM
Affiliation



PC303
1 of 1

Phone
3149542579
Email
litlroc@yahoo.com
Address
981
Meadowridge Dr
Kirkwood, Missouri 63122

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals go far enough to advance respectful stewardship and protect the herring for generations to come.

Respectfully,

Rochelle Miller

Submitted By
Romy Bekeris
Submitted On
12/21/2021 1:48:32 PM
Affiliation



PC304
1 of 1

Phone
2087558331
Email
Romybekeris@gmail.com
Address
117 Anna Drive
Sitka, Alaska 99835

As a citizen of Sitka, I stand in support the Sitka Tribe of Alaska's proposals for further herring management. Specifically, proposals 156, 157, and 158 best represent compromise between stakeholders and ensure a better future for our herring. Those who rely on herring subsistence have long noticed dwindling numbers in their populations, as well as a decrease in areas where the fish now live and spawn. These fish, so important to the ecosystem of southeast, have historically been overfished. If all stakeholders are to continue to benefit from the existence of herring, there needs to be positive change in the leeway and patience afforded to herring spawn. Proposal 156 is very reasonable. It asks that the same Harvest Control Rule for herring in other parts of Southeast Alaska be applied also to Sitka Sound. This proposal is in line with the consistency that the Sitka Tribe of Alaska envisions for herring management, and data cited within the proposal explains that mismanagement of this Harvest Control Rule is likely the cause of current overfishing. Focus in better harvest procedure is key to ensuring a healthy number of herring populations. Proposal 157 supports better protection of older herring, which are a fundamental guiding factor for the survival of younger herring. It simply asks for a slight change in the limit of what percent should be harvested, in consideration of the age of the herring. Failure in adjusting harvest limits for older herring, as noted by recent research, will lead to younger herring less able to find their spawning areas. This would harm subsistence fishers, industry stakeholders, as well as the ability of herring populations to spawn reliably. Proposal 158 further protects the survivability of herring populations. It asks that the fishery not be conducted should there not be a safe minimum number of integral older herring. The current sac roe herring fishery consistently targets the older herring, despite their importance to the younger herring and future herring generations. This spells out danger for all the herring of Southeast, and if we are to prevent complete disaster moving forward, this would be a smart and safe precaution to ensure the continuity of their spawn. These proposals, 156, 157, and 158, entail safe precautions, open-minded solutions, and great opportunities for stakeholder compromise. Proposals that I and the Sitka Tribe of Alaska oppose are proposals 159, 160, 161, 163, 164, and 165. These proposals do not align with a fishery that hopes for long-term, sustainable herring fishing. Please consider placing your support in the Sitka Tribe of Alaska, and those who have long safeguarded the stability and health of local herring. Thank you for your time in considering the proposals of our community.



[REDACTED]

RE: proposal 207

[REDACTED] I have read proposal 207 that wants to close "the head of the bay"& thought I would pass my feelings about it [REDACTED] & give [REDACTED] a bit of a history lesson about Dungy crab in Whale pass !

[REDACTED]

Regarding [REDACTED] comment about sea otter I was fishing Dungies in Whale pass before sea otter came around the corner @ Pt Baker, there a real problem now & [REDACTED] they killed Lava creek & Exchange cove in 1 winter. Also it seems like a advisory board would/could bring up the sea otter issue with ADFG NMFS ETC put them on the spot tell them your subsistence lifestyle story instead [REDACTED]

[REDACTED]

I have NEVER set gear directly down the beach so that it impedes skiff traffic from the homes along the beach; I have also NEVER set gear in such manner around the airplane float that it interferes with airplane traffic.

For quite a few years now I have only fished for 3 weeks in Oct then put my gear away & this 2020 fall season I am not even fishing because of depressed prices due to the virus.

I really don't like it when folks act like hillbillies! "it's mine because I lived here for a while" 2 years ago I was there Oct 1 about 10 AM trooper boat took ½ the subsistence pots with him when he left! Is it such that "local's" don't need to follow the simple rules (name & address & cotton) [REDACTED]

[REDACTED]

Whale Pass can hardly be considered a isolated community any longer there's always been airplane traffic "ya might be a few days when the weather curtails flights" but WP is a few miles from a paved highway that is state maintained year around & its about 50 miles to the 2 largest towns on POW 1 with a 5000 ft paved runway with IFR capabilities & another 20+ miles puts you at the Hollis terminal with regular ferry service to Ketchikan. As far as depressed economy & few jobs most small comminutes in SouthEast are the same so WP is NOT unique in that respect.

History lesson:

1.

I have lived & worked "logged/fished/towboat" around East POW most of my life including Whale pass.



2.

Back in the 60's/ 70's there were no Dungy crab inside Whale pass (there were a few out the N entrance in 25 fm) how do I know this I lived in the floating camp had dungy pots & never caught a crab inside "the point" I use to bring crab in from exchange cove, red bay, [REDACTED] Also FYI back then Barns lake & Lake Bay also did not have crab, My Dad is the guy who planted Dungies in WP BL & LB he would catch them elsewhere & then dump them overboard while passing through the above areas.

3.

Back a number of years ago @ a board meeting I suggested the "inside bay" be opened for the winter season WHY you ask ? because for years when I showed up on Oct 1 there would be NO subsistence pots in the water period ! & for years after the inner bay was opened I would show up Oct 1 NO subsistence pots in the bay yet locals would whine [REDACTED] about the nasty commercial guy !!! for the last 4-5 years now on Oct 1 I have seen 1/2 dozen or so subsistence pots out when I show up.

4.

ADFG reports that the 2020 summer dungy season is the second best on record & could take # 1 spot with the added fall poundage, Here's the news clip from KTOO news.

Fishermen brought in 5.81 million pounds of crab in a commercial season that ran from mid-June to mid-August. Joe Stratman leads crab management in Southeast for the Alaska Department of Fish and Game. What was taken this summer is more than double the previous ten year average," he said. The summer harvest was so good that it's higher than nearly all other full-season harvests, which also include the fall and winter fisheries. This year was only topped by the record year of 2002-2003.

My comments about proposal 206, You want to close the inside bay to "nonresident" sport dungy fishing but yet you want all those nonresident tourists to come spend their \$\$ at Whale Pass ! the term "biting the hand that feeds you comes to mind" you say the tourists ck there pots & other peoples pots (I know for a fact some of my pots get picked & even cut off!!)

I suggest you go to the board meeting & offer a less pots & smaller bag limits for nonresident sport approach.

Ron Opheim
F/V Chatham
P O box 2118
Wrangell, AK 99929
907 305 0992
Suijuris1@gci.net



SENT 12-16-

Ron & Helen Opheim
P O box 2118
Wrangell, AK 99929
F/V Chatham 907-305-0992 , suijuris1@gci.net

Hello from the 2 of us, & thank you for your service, I myself have been involved in commercial fishing most of my life & my wife has actively fished for the last 20 years together we hold SE gillnet, Dungy, Halibut, pot shrimp, cucumber permits.

Dungy proposals: Folks keep asking for more closed areas yet according to ADFG'S Joe Stratman we had a very good 2020 Dungy season & I agree!

We **Oppose** all Dungy crab proposals that ask for more closed area to commercial fishing, in particular the following.

Proposal 205: **Oppose** We have commercially fished Dungy's for over 20 years in the Coffman cove area & personally never set gear inside Coffman cove out of respect for the locals! And personally I have never seen commercial gear inside the cove.

Proposal 207: **Oppose** We have commercially fished Dungy's for over 20 years in Whale pass! Whale pass has 2 areas "outside the point" is open for the summer & fall season, "inside the point" is closed during the summer season & open for the fall season (waters inside the point is what proposal 207 is referring to)

We take proposal 207 is a personal attack against us as we are the only commercial boat that's fished the waters inside the point in years!! The wording in 207 suggests sea otter have caused the commercial fleet to be displaced from other areas (this is very true) BUT personally we have fished inside Whale pass before sea otter were ever swimming around the corner @ Point Baker!! 20+ years, 207 goes on to suggest "we" set our commercial gear directly inside the point in direct competition with the locals, I have told this story in oral testimony at board meetings & will tell it again, years ago & for many years we would show up on Oct 1 there wouldn't be 1 subsistence pot in the whole bay now for the last 3-4 years there has been about 1/2 dozen personal use pots out (3-4 years ago 9 am Oct 1 trooper skiff took 3/4 of them with him) We normally fish for 3 weeks then put the gear away in doing so we are always leaving plenty of crab for the 30+ - year around residents & we didn't even fish this fall season because of low prices caused by the pandemic, When we set gear we always stay away from the beach's where the houses are/airplane float/etc so as to not impede skiff/airplane traffic, We the only commercial fall crabber WILL be impacted if this area is closed!! additional side note back in the late 60's-70's there were no Dungy's in Whale pass "I lived there"

Proposals 204 & 206: Maybe its time to somehow limit nonresident sport fishing We strongly feel residents both commercial & subsistence should have first priority to the natural resources.

Proposal 209: Suggest rewording to include all of SE reg area A reduce the number of pots & bag limit for nonresident angler's

Proposal 121: **Oppose** As a gillnetter its been my observation that its not the "local year around residents" who are having problems with nets in the waters around Coffman cove in fact some locals own gillnetters, but it's the nonresident summer crowd & visitors who are having problems.

Thank you & be safe
Ron & Helen Opheim
Wrangell, AK



Ron & Helen Opheim
P o box 2118
Wrangell, AK 99929

Dec 13 2021

RE: comments from 2020 & additional comment for 2021 meeting

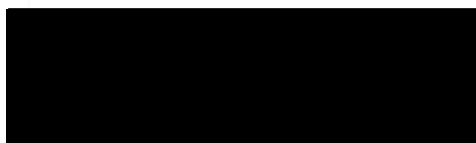
Hi, Have a safe meeting ! This is just a additional comment to cover the 2021 seasons events in and around Coffman Cove & Whale pass proposals

We fished the Oct season for 3 weeks in Whale pass & without fail Oct 1 when we sat gear we counted 2 local personal use pots in the area proposed to be closed, several days later we counted 10 or so personal use pots deployed, So my opinion is the locals are only prompted to fish when the commercial guy shows up & then write unnecessary proposals!

From my observations Sea Otter are a way bigger threat then commercial fisherman! You the board have the power to do something about that BUT for whatever reason choose to turn a blind eye to the devastation the sea otter have & are causing.

Thank you
Ron & Helen Opheim

ALSO ATTACHED IS MY LETTER TO



Submitted By
Russell Thomas
Submitted On
12/22/2021 8:15:32 AM
Affiliation
Alaska Sportfishing Expeditions



PC306
1 of 1

Phone
907-617-3619
Email
russellt@aseresorts.com
Address
1600 Tongass Ave
Ketchikan, Alaska 99901

I am writing in support of proposal 83. The proposal addresses issues related to long chinook closures in the sport fishery in years of low abundance. In short, it allows the department to go back to the old way of managing the fishery "on average" and over time, rather than implementing a hard 20% cap.

The new annex of Pacific Salmon Treaty (2018 - 2027) provisions are onerous in that it requires a payback if the Alaska all-gear quota is exceeded. Unfortunately, there is no reciprocal "carry-forward" or "bank" for fish that we do not harvest that could be used when we go over. The hard cap has forced the department to implement measures to ensure the sport fleet does not exceed its 20% allocation, which has resulted in long in-season closures.

This proposal balances the needs of sportfishermen and the troll fleet. We static bag limits at each tier, it is clear that a re-allocation between sport and troll is not likely needed. With the ability to manage "on average" and proposal 83 bag and annual limits, the troll fleet gives us some fish in years of low abundance, in exchange for fish in years of high abundance. It also protects residents by giving them preference over non-resident anglers, and steps up their bag limit prior to increasing the bag and annual limit for non-residents at each progressive tier.

Allocation is a difficult discussion because in most cases, someone has to lose for another person to win. Proposal 83 balances the needs of each user group in a way that solves the problem of extended chinook closures in the sport fishery, while doing the least amount of harm to the troll fleet and still protecting resident anglers.

In closing I should note that this process is already working to the benefit of the troll fleet, although there is not a similar provision that would allow it to benefit the sport fleet. In the last two years, the troll fleet has been able to catch sport and net allocation that was not going to be utilized by the sport and net fleet. I agree, this is what should happen. But the benefit should not be one-sided and a small tweak in the management regime would allow the department to effectively manage all the fisheries to ensure that the fish are utilized in a way that brings maximum economic benefit to SE and doesn't unfairly penalize any one user group.

Thank you for your time.

Russell Thomas
Alaska Sportfishing Expeditions
Ketchikan

Submitted By
Ryan Ieroy Cook
Submitted On
12/22/2021 1:44:02 AM
Affiliation
SE Gillnet permit owner



PC307
1 of 1

Phone
9077969012
Email
rcook1978@hotmail.com
Address
45 Iutak Rd.
Po Box 963
Haines, Alaska 99827

I write in opposition to proposals 122 & 123 because in 2018 when this last deal was made between USAG and the seiners, it was supposed to sunset in 3 years and return back to its original language. And with the Gillnet fleet under their allocation on Sockeye and Pink Salmon, these proposals would not help them try and get more of their allocation.

I write in support of proposal 124 because this proposal brings back the original plan implemented in 1989, where it puts a 15,000 Wild Sockeye cap on the Hawk Inlet shoreline fishery in July. This is to allow passage for north-bound sockeye going to the Chilkat, Chilkoot and Taku rivers. This plan has worked since 1989 and should be what language this goes back to.

I write in opposition to the Northern SE Alaska King Salmon action plan. In the action plan passed in 2018 it stated that if the Chilkat River met 3 consecutive years of king salmon escapement the SOC status would be lifted. And if the department would include ALL of the data through the 2021 season it would show that the Chilkat river has met that goal. Also if the correct & current data was used it would show that the commercial fleet isn't the primary harvester of the Chilkat King Salmon, Sport fishing actually is.



PROPOSAL 166

Establishing an open pound herring spawn on kelp fishery in Sitka Sound.

Thank you for taking the time to look at these documents supporting Proposal 166. This proposal would establish an alternative harvest method of open pound herring spawn on kelp within the current sac roe fishery in Sitka Sound.

In 1998 and 1999 an experimental open pound herring roe on kelp fishery was conducted in Sitka Sound. This project identified open pounds as a viable alternative to the sac roe fishery and produced published studies, data, and video which demonstrate the positive results of this alternative harvest method. The Department report, marketing reports, and other documents included in this packet have been submitted to the Board during past meetings. Clearly a lot of time has passed since this experimental fishery occurred but the data, studies, and reports produced are still very relevant today. The market for herring roe products has not changed much from the time these documents were produced. There is still a finite market for existing herring roe products but expansion is still possible with the addition of the thinner product that would be produced with open pounds in Sitka Sound.

The proposal for open pounding in Sitka Sound was first presented to the Board of Fisheries in 1996 and the political environment surrounding the sac roe fishery since then has changed. Issues regarding resource conservation and subsistence needs have come to the forefront and, under current market conditions; the economies of the fishery have declined. Diversifying the fishery with open pound spawn on kelp as an alternative harvest method would address many of the political concerns surrounding the fishery while also improving the overall value of the fishery.

This packet contains the following:

- Spawn on Kelp and the Sitka Sound Herring Fishery.
- ADFG Report to the Board re: 1998-99 Experimental spawn on kelp fishery in Sitka Sound.
- Spawn on Kelp Market Trends and Opportunities.
- Spawn on Kelp Market Study.
- Letter from Elderwood Trading regarding open pound fishery in Sitka Sound.

Respectfully Submitted,

Ryan Kapp



Roe on Kelp and the Sitka Sound Herring Fishery

Allowing an Open Pound Roe on Kelp (ROK) fishery in Sitka Sound as an alternative to seining will be a benefit to both the value and sustainability of the fishery. ROK will increase the overall value of the fishery while killing less fish than the existing harvest method.

The biology of spawning herring is a big factor in producing more value from the same biomass.

Currently, herring harvest can begin when roe recovery is sampled at 10% roe weight. Put simply: 100 tons of fish equals 10 tons of eggs. In some Sitka Sound openings roe recovery has been as high as 13%. In an experimental ROK fishery conducted in Sitka Sound in 1998 and 1999, Alaska Department of Fish and Game determined that 100 tons of herring biomass harvested with open pound ROK converts into 27 tons of product. This represents a recovery of 27% which more than doubles the existing fishery egg recovery.

The reason for this increase in weight is biological. Upon fertilization the herring egg hydrates with water increasing the weight of the egg. ROK eggs are spawned, fertilized eggs that are hydrated while seine caught sac roe are pre spawn eggs and not hydrated. Because of this hydration the weight of an individual egg produced with ROK is more than twice as heavy as an individual sac roe egg.

With ROK the value of the eggs is increased as well. For example: 100 tons of herring at current prices (realistically figure \$150 per ton) is worth \$15,000. That same 100 tons of herring harvested with ROK equates to 27 tons of product or, for simple math, a little over 50,000lbs. 50,000lbs of product sold at current prices (realistically figure \$5 per pound) is worth \$250,000. In this scenario the ROK product is worth more than 16 times the value of the traditional sac roe product.

While harvesting with ROK increases the value of the fishery product the best part is that with Open Pound ROK no herring are killed. With an Open Pound ROK fishery the herring can swim into and out of the kelp as they please. There are no nets used at any time. The fish swim in, spawn, and return to sea making them available to spawn again in the future.

Increasing the value of the resource while causing the resource less harm is a win / win scenario. This is something every fishery management plan should strive for. Incorporating Open Pound ROK into the Sitka Herring fishery would be a benefit both now and well into the future.



REPORT TO THE ALASKA BOARD OF FISHERIES,
1998 AND 1999 SITKA SOUND HERRING SPAWN-ON-KELP
EXPERIMENTAL TEST FISHERIES



By

Bill Davidson,
Dave Gordon,
and
Dave Carlile

Regional Information Report¹ No. 1J00-01

Alaska Department of Fish and Game
Division of Commercial Fisheries
Juneau, Alaska

January 2000

¹ The Regional Information Report Series was established in 1987 to provide an information access system for all unpublished divisional reports. These reports frequently serve diverse ad hoc informational purposes or archive basic uninterpreted data. To accommodate timely reporting of recently collected information, reports in this series undergo only limited internal review and may contain preliminary data, this information may be subsequently finalized and published in the formal literature. Consequently, these reports should not be cited without prior approval of the author or the Division of Commercial Fisheries.



AUTHORS

Bill Davidson is a fishery biologist III, with the Alaska Department of Fish and Game, Division of Commercial Fisheries, Region I, 304 Lake Street, Room 103, Sitka, Alaska 99835. Email: Bill_Davidson@fishgame.state.ak.us.

Dave Gordon is a fishery biologist II, with the Alaska Department of Fish and Game, Division of Commercial Fisheries, Region I, 304 Lake Street, Room 103, Sitka, Alaska 99835. Email: Dave_Gordon@fishgame.state.ak.us.

Dave Carlile is a biometrician II, with the Alaska Department of Fish and Game, Division of Commercial Fisheries, Region I, P.O. Box 240020, Douglas, Alaska, 99824-0020. Email: Dave_Carlile@fishgame.state.ak.us.

ACKNOWLEDGEMENTS

The authors would like to acknowledge Eric Parker, Nicole Duklos, Marie Murray, and Karl Wolfe for their field work and data collection efforts. Amy Holm, Ryan Scott, Christine Schmale, and John Preus conducted the analysis of herring samples in 1998 and 1999 respectively. The authors would like to thank Gronholdt and Associates and Alaska General Seafoods for their cooperation throughout the two years of this study.



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ABSTRACT

During the January, 1997 meeting in Sitka, the Alaska Board of Fisheries deferred action on a proposal which would have created the option for fishers to alternately use open platform gear to produce herring spawn-on-kelp and/or purse seine gear to produce sac roe herring. The board requested that the department conduct an experimental test fishery to evaluate the possibility of an open platform gear fishery. The department contracted with a team of fishers by competitive bid in 1998 and 1999 to conduct the test fishery. This report summarizes the planning, development, and results of the test fisheries, and department research in 1998 on a spawn-on-kelp to herring conversion rate. Using four, 40' x 60' rafts each year, the contractor successfully produced and marketed 27.2 tons of spawn-on-kelp which sold for \$311,528 in 1998, and 20.6 tons of spawn-on-kelp which sold for \$227,765 in 1999. To support the test fisheries 5.0 tons of *Macrocystis* kelp was harvested from Sea Otter Sound in 1998, and 4.6 tons were harvested in 1999. No conflicts were reported between the test fishery and either the subsistence fishery or the sac roe fishery. Department research determined a conversion factor estimating that 0.273 tons of spawn-on-kelp product are produced by 1.0 ton of spawning herring. The conversion is based on 1998 studies of Sitka herring fecundity and on a determination of the total egg deposition on spawn-on-kelp product. Based on this conversion 99.7 tons of herring were utilized during the 1998 test fishery and 75.6 tons were used in 1999. The department found no significant conservation or management concerns with a possible spawn-on-kelp fishery in Sitka Sound, but cautions that gear conflicts are possible depending on the amount of gear which might be allowed in such a fishery.



INTRODUCTION

In January of 1997 the Alaska Board of Fisheries considered a proposal that would allow the use of two alternate gear types during the limited entry herring fishery in Sitka Sound. Proposal 441 called for a new regulation that would create the option to fish open platform gear to produce herring spawn-on-kelp in lieu of, or in addition to, fishing with purse seine gear to harvest roe herring. The intention of the proposal was to reduce economic uncertainty, increase fishery value, and to reduce unnecessary mortality of herring caused by the fishery. Successful open platform fisheries now occur in British Columbia and in San Francisco Bay.

Testimony presented to the board concerning this proposal indicated that there were numerous, legal, policy, fishery management, and socioeconomic questions regarding this proposal. A past board proposal to create a herring spawn-on-kelp fishery in Sitka Sound had been rejected because the Sitka Sound herring stock was already fully allocated and utilized for sac roe herring by purse seine gear. Past proposals to allow the use of gillnet gear in Sitka Sound had likewise been rejected. Proposal 441, however, did not require reallocation to new users. Instead the proposal would offer existing users the choice of fishing an alternate gear based on economic considerations. A representative of the Commercial Fisheries Entry Commission explained that, should the economics of the fishery fundamentally change, a past economic study to determine optimum numbers of participants for the herring fishery in Sitka would be subject to further review and additional entry would be possible (CFEC, 1992; AS 16.43.300). Some limited entry permit holders in the Sitka fishery did not support the proposal due to the threat of more entrants into the fishery. Another major concern from a legal perspective was the question whether this alternate gear fishery would set statewide precedent allowing alternate gear types in other fisheries, thus creating economic uncertainties throughout the fishing industry. Further questions arose concerning the potential economic impact on other herring pound fisheries that produce spawn-on-kelp for the Japanese market. Given that the Sitka Sound herring stock is one of the larger stocks in Alaska, and the proposal was open ended, economic concerns were heightened.

In addition to policy, legal, and social considerations, an open platform herring spawn-on-kelp fishery had not been demonstrated in Alaska. Would the fishery be economically feasible? How would the fishery mesh with the existing subsistence spawn-on-kelp and spawn-on-hemlock fisheries? Would there be a need for closing certain waters? Would there be any conflicts with the herring sac roe fishery? Would there be any herring conservation concerns? Is there any mortality of herring as a result of this fishery? How would the department account for utilization of herring? What sort of gear would be allowed? How much spawn-on-kelp might the fishery produce? What would be the basis for allocation of the available herring guideline harvest between sac roe production and spawn-on-kelp production? What would the department and/or Fish and Wildlife Protection require to monitor and manage a new spawn-on-kelp fishery concerning personnel, reporting requirements, dockside sampling, new regulations, and financial resources? Would sufficient *Macrocystis* kelp be available to support a potentially large new fishery in Sitka Sound and might early season use for Sitka affect kelp availability in other existing fisheries? Would the department need to develop a kelp management program to ensure kelp conservation and allocation?

Because of the many unanswered questions regarding proposal 441, the Board of Fisheries took no action at the January 1997 meeting. Instead, the board directed the department to conduct an experimental test fishery to gain familiarity with the potential new fishery and to help resolve some of the unanswered questions.

Given the three-year Board of Fisheries cycle, the department considered the best approach to a test fishery would be over a two-year period. During the first year the department would focus on as many



fishery management issues as possible. During the second year the emphasis would shift to obtaining information on *Macrocystis* kelp abundance, distribution, and productivity.

This report describes the experimental fishery and how it was conducted, and presents experimental design and results of data gathered during the first year of the fishery conducted in the spring of 1998. Since many aspects of the 1999 experimental fishery were similar to that of 1998 fishery, this report only briefly summarizes the conduct and results of the 1999 fishery. The research emphasis of the 1999 experimental fishery was to obtain information on the abundance, distribution, and productivity of *Macrocystis* kelp and the results of that work are reported in Van Tamelen and Woodby, 1999 (RIR 1 J99-24).

BID SPECIFICATIONS AND CONTRACTING

The department sought a contractor to conduct the experimental herring spawn-on-kelp test fishery. An Invitation to Bid was issued on January 19, 1998. Elements considered crucial to the success of the test fishery were: 1) to ensure that any contractor had sufficient experience in the harvesting and marketing of spawn-on-kelp, 2) to ensure that spawn on kelp produced was successfully marketed, 3) to ensure that the contractor would have access to necessary resources to carry out the project, and 4) to ensure that the department generated adequate funding to cover all department expenses necessary for monitoring and research. Bid requirements to accomplish these projected needs included: two years experience in the harvesting and marketing of spawn-on-kelp, a signed letter of intent to purchase all marketable product from a licensed Alaska processor, a commercially licensed and USCG inspected fifty foot vessel, harvest platforms of at least 2,400 square feet of surface area, and a credible harvesting, processing, and marketing plan. The department's budget for the project was \$64,000. The bid was structured so that this amount was advanced to the department as a surety deposit. The contractor would be able to recover the bid amount as well as other expenses up to the amount bid based on the sale of herring spawn-on-kelp produced by the test fishery. These combined requirements, and the \$64,000 surety deposit in particular, led to a test fishery planned by experienced fishers and structured at a scale to meet the necessary financial demands.

The contract was to be awarded to the lowest bidder who met the necessary terms and conditions. Only one bid was received. The contract was awarded to Gronholdt and Associates (PGA) on February 25, 1998. PGA consisted of twenty individuals that included 13 Southeast herring seine sac roe permit holders. The bid amount was \$336,000. The bid was based on the planned production of 40,000 pounds of product worth an expected average price of \$8.40/lb. Under terms of the contract the contractor was required to maintain detailed records of the various elements of the fishery including kelp harvesting activity, operation of kelp harvest platforms, and harvesting, processing and marketing of the product. The contractor was required to provide a detailed report summarizing all of these activities including a statement concerning product acceptance in Japan. In addition, all phases of the experimental fishery would be subject to direct observation by department personnel assigned to the project to both monitor and to conduct biological sampling.



OPERATIONAL GUIDELINES

As a department sponsored test fishery, the contractor was required to work under the terms and authority of an "Experimental Fishing Gear Permit" (Appendix A) and a "*Macrocystis* Kelp Harvesting Permit" (Appendix B). These permits provided the detailed operational guidelines for the fishery and set forth specific obligations between the department and the contractor.

In determining the guidelines for operation of open platform gear in Sitka Sound consideration was given to whether areas known to be important in the subsistence spawn-on-kelp or spawn-on-branch fishery should be closed. The department did not want the test fishery to negatively impact the subsistence fishery, however, the relatively small scale of the test fishery suggested that impacts would be minimal. Also, given that the time and location of herring spawning is uncertain, it was decided that the contractor should have the maximum flexibility in deciding where to locate the fishing platforms. A permit stipulation required that the contractor contact the department representative immediately in the event of any conflict with subsistence users. The department would then intervene, if necessary, to resolve any disputes. The contractor also hired a subsistence liaison, a member of Sitka Tribe of Alaska, to help coordinate with local subsistence users.

Under terms of the Experimental Fishing Gear Permit, individuals, gear, vessels, aircraft, and totes would be available according to the contractor's bid. Access would be provided to department personnel for monitoring and sampling purposes. Logs of kelp placement, raft positions, and harvest inventory would be kept. All marketable product would be delivered to the Seafood Producers Cooperative plant in Sitka for sale to Kanaway Seafoods, Inc. and all sales would be recorded on the department's test fish card both as drained, wet weight and as brined weight by grade. In addition the contractor was to provide written reports by specified dates.

Terms of the *Macrocystis* Kelp Harvesting Permit required harvest in accordance with existing kelp harvest regulations (5 AAC 37.300), notification of the department 24 hours in advance of harvest, provisions for accommodations and workspace for two department technicians aboard the kelp harvesting vessel, a logbook and inventory of kelp harvested, notification of any kelp discarded prior to harvest, and provisions for sampling of kelp by the department. Kelp harvest was allowed in districts 3-13 with limitations. Portions of Districts 3, 4, 5, and 13 were closed to prevent harvest in areas where herring spawning might occur or where harvest supported other existing fisheries. Since the department had already received complaints about kelp availability or harvest activity prior to this test fishery, District 3 was closed under this permit south of the latitude of Tonoweck Narrows (in the Craig vicinity) and District 4 was closed in waters around Bucarelli Bay. Since the contract established a limit on the dollar value of product which could be sold and reimbursed to the contractor, there was no limit set on the amount of kelp which could be harvested under this permit. Based on discussions with the contractor it was expected that 40-45 totes of kelp would be required to provide kelp for four 40' x 60' rafts.

The Invitation to Bid, in combination with the contractor's bid response and harvest plan, the Experimental Fishing Gear Permit, and the *Macrocystis* Kelp Harvesting Permit are the documents which determined the structure, size, and outcome of the Sitka spawn-on-kelp test fishery.



SUMMARY OF FISHING OPERATIONS

Kelp Harvest

The contractor's initial plans called for harvest of kelp from District 13 in an area south of Sitka Sound. Following a survey of kelp beds near Sitka prior to the fishery, the contractors determined that there was insufficient mature kelp in the area to support the experimental fishery.

The contractor responded by use of two spotter planes and vessel reconnaissance to locate kelp beds suitable for harvesting. A suitable bed was located in District 3 near Gas Rock on the northern shore of Heceta Island in Sea Otter Sound (Figure 1). Kelp harvest timing was coordinated with monitoring events prior to the Sitka herring spawn and fishery. Harvesting of kelp began on March 16, 1998. Two technicians hired by the department accompanied the kelp harvest cruise aboard the *F/V Starrigaven*.

Kelp was harvested from two skiffs. Kelp fronds were lifted from the water using a gaff hook and inspected for blade quality. The top two feet of the apical portion of fronds was removed, and the next 6-8 feet of useable frond was cut and placed into totes on board the skiff. When full, totes were transported to the tender and loaded with a crane. Net weights of kelp totes were recorded to the nearest pound on the kelp harvest logbook. Totes were covered and secured on deck for transport to Sitka. Only 35 of 40 totes harvested were weighed due to an oversight. Total wet weight of 35 totes was 8,825 pounds. Adjusting this weight for the five totes not weighed indicated a total harvest of 10,085 pounds. Kelp harvesting was completed in nine hours by seven people. Transport to Sitka from Sea Otter Sound required 22 hours, and kelp arrived in good condition.

Raft Assembly

Four 40' x 60' aluminum platforms (rafts) were used in the experimental fishery. This gear is owned by two members of the contractor's team and used in the San Francisco Bay open platform spawn-on-kelp fishery. Sections of these rafts were loaded into containers and shipped to Sitka for assembly. The rafts were assembled on March 14 in Thompson Harbor. The rafts consisted of two 30' sections bolted together to form two 60' pontoons. The pontoons were bridged together at each end with two 40' sections (Figure 2).

Kelp Rigging

Shortly after arrival in Sitka, kelp fronds from Sea Otter Sound were rigged on 3/8" polyethylene lines for suspension into the water spanning the 40' distance between pontoons of the rafts. The rigging operation took place beginning on March 17 in Thompson Harbor and involved 37 people for seven hours from



8:00 p.m. until 3:00 a.m. Beackets spaced 16 inches apart were used to attach the kelp fronds to the polylines, and the top of the frond was weighted with a single four-ounce lead weight to hold the frond in a vertical position in the water (Figure 3). In general each line had 30 fronds attached. Lines with attached kelp were coiled into totes for transport to the platforms. Lines were attached between pontoons of the raft at two-foot intervals. Two rafts contained 30 lines with 30 fronds each, for a total of 900 fronds. One raft had 29 lines with 30 fronds each, for a total of 870 fronds. One raft had 36 lines of 30 fronds each, for a total of 1,080 fronds. The overall amount of kelp deployed for the four kelp rafts was: 89 lines, 3,750 kelp fronds, and (based on 15.7 kelp blades per frond) a total of 58,875 kelp blades.

Raft Deployment

A generalized description of a raft fully rigged with kelp and secured in a fishing location is shown in Figure 4. The time and location of raft placement in relation to the herring spawn event is critical to the success of the open platform gear fishery. The department began monitoring herring and herring predator activity by aerial survey on March 10, and began roe sampling on March 12. Survey and sampling reports were available on a recorded message as well as on VHF radio broadcasts. In addition to monitoring department surveys, the contractor flew aerial surveys to help coordinate raft placements. Based on increasing roe maturity and observations of herring near traditional spawning areas, the sac roe fishery was placed on two-hour notice at 8 a.m. March 16. Harvest of kelp in Sea Otter Sound also began on that date. Three Sac roe fishery openings occurred on March 16, March 18, and March 19 to harvest the 6,900 ton herring guideline harvest level. Kelping of the rafts was completed on the early morning of March 18. First spawn for the 1998 season was observed by the department on March 19 with 0.3 nautical miles observed on southwest Middle Island. The contractor's group met on March 19 to discuss options for raft placement locations, developments of the spawn, and to consider subsistence concerns. On March 19 the first two rafts with kelp attached were towed to areas along the southern shoreline of Middle Island (Figure 5). On March 20 spawning increased to 2.2 nautical miles at South Middle Island, Crow Island, and at Halibut Point. The contractor then towed the two other rafts to positions along Halibut Point Road and at Kasiana Island. The position of each raft as well as the location of herring spawn is shown in Figure 6. Spawning activity increased daily to 14 nautical miles on March 21, to 27.5 nautical miles on March 22, and to a peak of 37.5 nautical miles on March 23. The raft placements coincided with initial spawn activity in each location, and there was no need to move any raft to a better location. All rafts remained in place for a period from three to five days through the peak of the spawn.

Rafts were positioned at three locations using two shore lines and one anchor line on the seaward side of the raft. The fourth raft was tied to a private dock along the Halibut Point Road shoreline. In relation to the sea floor, rafts were positioned deep enough that at the lowest tides the kelp fronds would be suspended over the bottom. Rafts were lighted at night as per US Coast Guard regulations. Rafts were guarded at night by members of the contractor's team.

Although subsistence fishers were observed setting hemlock branches in the vicinity of each raft, there were no conflicts. The contractor's subsistence representative set hemlock branches directly underneath the raft located along Halibut Point Road and reported good egg coverage on those branches. Likewise there were no conflicts reported with the sac roe fishery, except that one seine skiff towing on a completed set lightly bumped a kelp raft being towed into position. The latter action caused no damage, was unnecessary, and could easily have been avoided.



Towing for Spawn-on-Kelp Harvest

In order to maintain kelp quality, spawn-on-kelp is generally removed from the water and preserved within 10 days of the date of harvest. Once spawning began to subside the platforms were towed 5-7 nautical miles to Cedar Cove in Katlian Bay in preparation for harvest at that location (Figure 6). The contractor explained that towing spawn-on-kelp to a milt free area was necessary to prevent the blades of product from sticking together when layered into totes during harvest. Cedar Cove was outside of the herring spawning area and in a protected location. The first platform was towed on March 23, and the other three rafts were towed on March 24.

Harvesting of Spawn-on-Kelp

Harvest of the first platform from the Halibut Point location occurred in Cedar Cove on March 24 from 7:45 a.m. to 11:00 a.m. Harvest of the additional three platforms occurred on March 25 from 7:30 a.m. to 5:00 p.m. Harvest into totes and transporting to the Seafood Producers Cooperative plant was carried out by a crew of 33 people. With this crew, harvest of each platform took approximately three hours. Individual kelp platforms were secured between two seine vessels for harvest (Figure 7). Product was harvested simultaneously from two sides of the platform. Two pairs of stantions on opposite pontoons of the raft were used to rig a loop of line through pulleys attached at the top of each 5 foot high stantion. Lines holding spawn-on-kelp fronds were then pulled toward each pontoon where the crew removed the product and handed it up to the deck of the seine boat. Fronds were placed on a processing table, and blades were cut from the fronds (Figure 8). The stipe and pneumatocyst were discarded, and the kelp blades were harvested into totes. An inventory of totes with tare weights was kept. When raft harvesting was completed, full totes were transported directly to the processing plant.

Processing of Spawn-on-Kelp

After harvest and following transport to the Seafood Producers Cooperative plant in Sitka, totes containing product were allowed to drain before weighing. Total drain time was 1-4 hours between harvesting and weighing. Total wet (unbrined), drained weight of spawn-on-kelp product was 54,468 pounds (27.2 tons).

After weighing, totes were filled with saturated brine solution. Product was fully submerged in the brined totes using a plastic grate weighted with 4 x 4 lumber. Brine was periodically drained and replaced with fresh saturated brine until the salinity of drained brine reached 100%. The product was held in brine for 14 days before final draining, trimming, grading, weighing, pailing, and labeling for market.

Details of fishing activity and production for each of the four rafts is summarized in Table 1. Individual raft designations by location are shown in Figure 4.



In order for the department to observe the details of processing, grading, and pailing of product and to take biological samples of product, a condition was made that all product would be processed in Sitka at the Seafood Producers Cooperative plant. During grading, however, some of the product from two of the platforms was found to be contaminated with sand and/or silt. Members of the contractor's group speculated that this problem was caused either by kelp stipes directly touching the bottom, or by bottom sediments stirred up by herring spawning activity. In order to maintain quality control standards, product from two platforms (B-1 and B-2) were allowed to be shipped to the Home Port Seafoods plant in Bellingham, Washington where a light table and product washer were available for processing. This procedure was successful and all of the product was either trimmed or washed free of contamination. Processing of product occurred in Sitka from April 8-15, and in Bellingham from May 10-20, 1998. Eight to fourteen workers processed product in Sitka, and ten workers processed product in Bellingham.

In order to obtain final weights of brined product, which are the weights used for marketing purposes, spawn-on-kelp is placed in baskets on edge and drained for a minimum of one hour to remove brine. Product of the same grade is placed into square plastic pails. Pails are labeled with weight and grade, filled with brine, topped with salt, tapped with a mallet to remove bubbles, then sealed, and finally palletted for shipment or storage. Product is stored in a temperature regulated cold room.

Total brined weight of the 1998 spawn-on-kelp produced by the experimental fishery was 57,038 pounds, somewhat heavier than the 54,468 pounds recorded prior to brining. An accounting of weight by grade is presented in Table 2. Spawn-on-kelp is generally graded as "jumbo, #1, #2, #3, #4, and #5 (Figure 9). Actual grading standards may vary between processing companies, but grading used by Kanaway Seafoods are roughly described as follows:

- Jumbo--large pieces with thick coverage (over 1 cm) on both sides;
- #1-- large pieces with multiple, even layers of eggs on both sides;
- #2-- large pieces with multiple, even layers on one side and thinner or uneven layers on the other side;
- #3-- smaller palm size pieces, or larger pieces with thin even coverage on both sides;
- #4-- variable egg coverage, or smaller than palm size pieces;
- #5-- minimal, sparse or absence of egg coverage on one side, trimmings, peelers (eggs which have separated from the kelp).

Percentage of total weight by grade for the test fishery was 21% #1, 53% #2, 16% #3, and 11% other grades. No Jumbo grade was produced. The two platforms designated K1 and K2, located south of Middle Island produced a higher percentage of #1 grade product (Table 2). K1 and K2 product is combined since the contractor failed to keep product from those two rafts separated while harvesting.

Marketing

Marketing by Kanaway Seafoods in Bellingham follows direct inspection of spawn-on-kelp product by buyers from Japan. Such inspections allow buyers to compare graded product from different fisheries to establish price, and generally occur about the time of similar inspections for the Canadian fisheries in Vancouver, British Columbia. Product was inspected in late June. The final domestic sale of product from Sitka was made to two buyers around June 29, 1998, and shortly thereafter product was shipped to Japan.



Average exvessel price was \$5.46/pound for a total value of \$311,538.49 for 57,038 pounds (28.5 tons), (Table 2). Summary statistics for the 1998 fishery are presented in Table 3. Price varied from \$7.58/pound for #1 grade to \$0.45/pound for #5 grade. Kanaway Seafoods worked with the contractor as a processor and product brokering agent. Some processing costs, e.g. totes and brine, were paid for by the contractor, and a brokering fee was applied to the sale before paying the State and reimbursing the contractor. Due to this marketing arrangement exvessel prices paid might be somewhat higher than for similar product from a traditional fisher-processor relationship where the processor is making a profit as well as covering all processing costs.

Since the sale amount was less than the \$336,000 bid by the contractor, the department reimbursed the total value of sales, and retained the initial \$64,000 surety deposit to cover the departments costs associated with the test fishery.

DEPARTMENT SAMPLING AND MONITORING PROCEDURES

Visual Documentation

Since a successful open platform spawn-on-kelp fishery has not yet occurred in Alaska, the department's goal was to observe and to document the various stages of the test fishery. The department utilized 8 mm video and 35 mm camera to document the fishery and will present a 20 minute summary of the test fishery in coordination with the staff oral report to the Board of Fisheries at the January 15-24, 2000 meeting in Juneau.

Kelp Sampling

Although closed pound spawn-on-kelp fisheries in Southeast Alaska generally suspend individual kelp blades from lines within pound nets, this test fishery was planned to hang sections of kelp fronds with multiple blades still attached to the stipe. The department's sampling goals included direct observation of the kelp harvesting process, determination of the total amount of kelp harvested, measurement of the number of fronds and blades of kelp utilized, and determination of average size of fronds and blades utilized.

Department technicians on the kelp harvesting cruise in Sea Otter Sound ensured that kelp harvest logbooks were maintained to document location and total weight of kelp harvested. Despite this, total weights were taken on only 35 of 40 totes harvested. Totes of kelp were weighed to the nearest pound on a 2,000 pound capacity electronic hanging scale. Four of 40 totes of kelp harvested were sampled on the grounds to determine a count of the number of kelp fronds/tote, and the number of blades of kelp per frond. Additionally, upon arrival in Sitka and 24-hours after kelp was harvested, department technicians randomly selected 31 kelp fronds and took weights of each stipe and blade to the nearest gram.



Spawn-on-Kelp to Herring Conversion Rate

A primary objective of our research efforts was to determine the total amount of herring eggs and the equivalent herring biomass used in the production of spawn-on-kelp. This conversion rate is necessary to determine the relative impact of spawn-on-kelp harvest on the herring resource and to allocate available quota between users if a spawn-on-kelp fishery is allowed. An additional sampling goal was to compare spawn-on-kelp weights before and after brining to form a basis for catch reporting requirements.

Subsampling of spawn-on-kelp was conducted as a two-way, stratified random sampling design (Bryant, et al. 1960). The two criteria for stratification were the platforms and the position of kelp within the platforms. The three platform strata corresponded to the Platform B-2, Platform B-1, and Platforms K-1 and K-2. Platforms K-1 and K-2 were combined into a single stratum because the kelp from these two platforms was inadvertently combined when harvested by the contractor. The two position strata were an inner block of fronds (inside stratum) surrounded by an outer band of fronds (outside stratum). Position of kelp within the platforms was used as a stratifying criterion because Moore and Reilly (1989) indicated that herring spawn deposition nearer the center of open platforms ("pounds") was denser than that closer to the perimeter of the platforms. To further explore this finding 20 fronds were selected at random from positions closer to the center of the platform, an arbitrarily demarcated "inside" block of fronds, and 20 from positions closer to the perimeters of the platforms, an arbitrarily demarcated "outside" block of fronds. Appendix C depicts the random locations of the fronds sampled from each platform.

Just prior to harvesting, a small boat was deployed inside the platform and the pre-selected fronds were marked by tying flagging tape to the butt end of the frond. A permanent marker was used to write the frond location (i.e. line number and position number) on the flagging so that positioning of the frond could be recorded during sampling.

During harvest if the frond was marked with flagging tape, the entire frond was placed in a separate tote for sampling. Each randomly-selected frond, including the attached herring roe, was weighed to the nearest gram at the site of harvest. The total number of blades on each randomly-selected kelp frond was counted. From each of the randomly-selected fronds, five blades were systematically selected, removed from the stipe, and weighed (w_{eghi}), to obtain an estimate of the mean weight of blades plus roe. Blades removed for weighing, counting from the top of the frond down, were the first, third, seventh, tenth, and last blades. After weighing each of the five blades, each blade was tagged with a white "T"-bar tag and the tag number recorded to enable relocating and re-weighing each blade after the brining process. The weighed, tagged blades were segregated from the rest of the blades to facilitate post-brining re-weighing of the blades. A systematically-selected subset of the tagged blades was segregated from the other tagged blades to facilitate subsampling for egg counts.

After the five blades were removed, tagged and weighed, all of the remaining blades were removed and the bladeless stipe, including any roe on the stipe, was weighed (w_{stghi}). Just above the attachment point of the seventh blade to the stipe, a seven-cm section of the stipe was cut out, weighed to the nearest gram and placed into a labeled plastic jar filled with Gilson's solution. The stipe sections were sent to the ADF&G herring lab in Ketchikan, along with post-brine sections of blades plus spawn, to obtain counts of the total number of eggs on the stipe sections.

The tagged blades were soaked in 100% brine solution for 14 days at the processing plant. The tote was drained of brine and the tagged blades were weighed a second time to obtain the post-brining weights (w_{ebrghi}). The thickness of the spawn-on-kelp was measured to the nearest millimeter at the mid-section of the blade using calipers and a processing technician assigned a grade to each sampled blade. A transverse

axis strip, approximately two-cm wide, of kelp plus roe, was cut from one of the five blades from each randomly-selected frond. The blades from which strips were subsampled were selected systematically. The first subsample was taken from the first blade down on the first randomly selected frond, the second subsample was removed from the third blade down on the second randomly-selected frond, etc. This pattern was repeated, cycling through the five blade positions described above to eventually sample one blade from each of the selected fronds from each of the platforms. These strips of kelp with roe were weighed (s_{ghi}) and placed in labeled plastic jars filled with Gilson's solution for later enumeration of eggs to determine the egg density (eggs/gram of spawn-on-kelp product).

All eggs on the transverse axis strips were removed and weighed to obtain the total weight of eggs on each strip. From the total sample of eggs removed from the strips, two, 1-gram sub-samples of the eggs were selected from each strip and the number of eggs counted (e_{ghij}) to yield an estimate of the number of eggs per gram of eggs. These counts, in combination with the total weights of eggs removed from each subsample, and the weights of subsamples (kelp + eggs) were used to estimate the density of eggs (eggs/gram) on the kelp blades. Egg density on stipes was based on a count of the total number of eggs on each of the approximately seven-cm long stipe sub-sections ($e_{stisghi}$) which were removed from just above the attachment point of the seventh blade of each frond.

Egg counts on kelp were related to an experimentally derived fecundity-at-size relationship for 1998 spawning herring. A fecundity study was completed in 1998 on Sitka herring as part of this study to provide an accurate conversion rate of the spawn-on-kelp weight to the equivalent biomass of herring utilized. Approximately 100 pre-spawning herring representing the range of mature herring sizes were collected during pre-sac roe fishery sampling. Samples were analyzed by the ADF&G herring lab in Ketchikan. The methodology of the fecundity experiment are reported in Larson, et al. (1999).

Parameter Estimation

All estimates were based on the two-way, stratified random sampling design. A primary parameter estimated in this study was the total number of eggs [E_T ; Appendices D (notation) and F (point estimator diagram)] deposited on all kelp within the four open platforms. This estimate, used in combination with an estimate of fecundity (F), yielded an estimate of the total weight of herring (W_H ; Appendices D and F) contributing to the deposition on the platforms. The ratio of the total weight of spawn-on-kelp product (W_{SOK}) to W_H , yielded an estimated ratio (C) of the weight of open platform, spawn-on-kelp (OP-SOK) product to weight of herring estimated to have produced that amount of product.

A nested ANOVA was conducted to test for differences in mean egg deposition among platform and position strata. Scheffe's test was conducted to further identify significant differences between individual platform strata.

Associations between the point and variance estimators for C , as well as parameters that are precursors to C , are indicated in Appendices E and F. Appendix G is a discussion of why a covariance term used in estimating the term p_{ub} has been excluded.



RESULTS

Kelp Sampling

A total of 4,040 *Macrocystis* kelp fronds weighing 10,085 pounds were harvested for this fishery. The number of fronds placed into the four rafts and fished was 3,750 fronds. The mean number of blades on the harvested portion of the frond was 15.7 amounting to a total of 58,875 *Macrocystis* kelp blades fished. The mean weight of fronds based on samples taken in Sitka was 984 g, the mean stipe (stalk without the blades) weight was 299 g and the mean blade weight was 47 g.

Spawn-on-Kelp to Herring Conversion Rate

The mean wet weight of an unbrined, untrimmed blade of spawn-on-kelp was 414.8 g (95% CL = 401.7-427.9). Brining the blades increased the mean weight by almost 20%, to 497.1 g (95% CL = 479.1 – 511.2). The estimated total number of eggs deposited on all harvested blades was 10,108,483,281. The estimated total number of eggs deposited on all stipes was 117,963,192. The estimated total number of eggs deposited on all fronds (blades + stipes) from the four platforms was 10,226,446,473. Thus, approximately 98% of the total egg deposition occurred on the kelp blades. Based on this estimate of total egg deposition and a 1998 Sitka-specific herring fecundity estimate of 102,567,376 eggs per ton of spawning herring (Larson 1999), the total estimated weight of herring needed to produce the 27.2 tons of SOK product harvested was 99.7 tons (Table 4).

The estimated ratio of the weight of herring spawn-on-kelp product to the estimated weight of herring required to produce that weight of product (C) was 0.273 (95% CL = 0.247-0.299; Table 4). Estimates of additional parameters that are precursors to C are listed in Table 3.

There were no statistically significant differences ($\alpha = 0.05$) in mean number of eggs per gram of brined spawn-on-kelp product between platform Strata 1 (Platform B-1; 346.2 eggs/gram) and Strata 3 (Platforms K-1 and K-2; 351.3 eggs/gram). However mean deposition on both of these strata was significantly greater than on Strata 2 (Platform B-2; 314.9 eggs/gram). The mean weights of whole spawn-on-kelp blades was 466 gm for Platform B-1, 424 gm for Platform B-2, and 393 gm for Platforms K-1 and K-2. This discrepancy would suggest that the size of the blades fished in Platform B-1 were, overall, larger than those fished in the other platforms. Although mean deposition in the outside position strata was greater than on the inside (345.3 vs. 337.1 eggs/gram), this difference was not statistically significant ($P = 0.088$).

The thickness of the spawn-on-kelp measured by grade showed mean thickness of 11.1 mm - grade #1, 9.1 mm - grade #2, 6.3 mm - grade #3, 3.7 mm - grade #4.



REVIEW OF 1999 EXPERIMENTAL FISHERY

Following is a brief summary of the experimental spawn-on-kelp fishery conducted in Sitka Sound during the spring of 1999. Many aspects of the 1999 experimental fishery were similar to those of the 1998 fishery including the bidding procedures and the general conduct of the fishing operations. The contractor, Gronholdt and Associates, was again awarded the bid which was \$399,000 based on expected production of 50,000 pounds of spawn-on-kelp product at the expected price of \$7.98/pound. The contractors had a marketing agreement with Alaska General Seafoods (formerly Kanaway Seafoods) to process and market the product. A surety deposit of \$74,000 was required to cover the department costs associated with management of the fishery as well as to fund research on the abundance, distribution, and productivity of *Macrocystis* kelp in Southeast Alaska.

Kelp harvesting occurred on March 21 at a kelp bed located at the eastern entrance to Port Alice in District 3 (Figure 1). A total of 2,880 fronds were harvested weighing 9,151 pounds. Kelp was transported on the tender vessel *Evermore* arriving to Sitka on March 22.

The four rafts were rigged with kelp on March 23 inside the Thompson Harbor breakwater. The amount of kelp harvested was not enough to fully deploy kelp in all four rafts. The shortage of kelp was apparently due to insufficient totes available during the harvest, and kelp fronds were larger than during the 1998 test fishery. Fronds measured averaged 21 blades per frond compared with 16 blades per frond in 1998. Two of the rafts (#1 & #2) were fully strung with 870 kelp fronds, one raft (#3) had 690 fronds and one raft (#4) had only 450 fronds. All four rafts were deployed to fishing locations on March 23.

Major spawning began March 22 and continued through March 30. Rafts #1 and #2 were positioned together in a cove on the southwest shoreline of Middle Island, raft #3 was secured to a private dock on Halibut Point Road and raft #4 was positioned on the west side of Kasiana Island (Figure 10). All three locations were also used during the 1998 experimental fishery. Raft #3 was moved to the north side of Kasiana Island on March 26 because of a weak herring spawn at the initial site. All other rafts remained in place until ready for harvest.

On March 27, all rafts were towed to Cedar Cove and allowed to soak overnight in waters free of milt. All four rafts were harvested on March 28 with 36 people involved in the harvesting operations. The totes of spawn-on-kelp were transported to Seafood Producers Cooperative in Sitka where they were weighed and then brined. The total weight of the unbrined product was 41,256 pounds.

The contract specified that the product was to be trimmed, graded, and pailed in Sitka, however, the contractors requested that they be allowed to ship the product to Home Port Seafoods in Bellingham, Washington for processing. This request was made because the Bellingham plant was equipped with a light table for inspecting the product for silt or other particulate contaminants as well as a specialized machine for rinsing contaminants from the spawn-on-kelp. The request was granted under an agreement that a department representative would be flown to Bellingham to observe the process at the contractor's expense. The trimming, grading, and pailing began on May 3 and a department technician was present on May 3 to observe and document the grading process as well as to conduct further sampling.

A limited sample of spawn-on-kelp was taken to conduct egg counts to estimate the number of eggs per unit of product weight. Two samples were taken from each of the four rafts and resulted in a mean of 335 eggs/g of spawn-on-kelp. This compares with a mean of 343 eggs/g from sampling in 1998. The estimated total amount of herring utilized to produce 41,256 pounds of spawn-on-kelp was 75.5 tons



based on the ratio of 0.273 tons of spawn-on-kelp per ton of herring derived in 1998. A comparative summary of the 1998 and 1999 experimental fishery statistics is shown in Table 3.

The total value of the spawn-on-kelp was \$227,965 based on 43,131 pounds of graded product at an average price of \$5.29/pound. A comparison of poundage and exvessel value by grade between the two years is presented in Table 5.

DISCUSSION

Little is known about the biology and abundance of *Macrocystis* kelp in Southeast Alaska. Historically, District 3 has provided over 90% of the total *Macrocystis* kelp harvested for spawn-on-kelp fisheries in Alaska. A majority of that harvest has come from Sea Otter Sound and the Maurelle Islands (Scott Walker, *personal communication*). In 1998, a total of harvest 23.7 tons was reported on harvest permits and 79% was reported from Sea Otter Sound. This harvest supported five spawn-on-kelp fisheries including Prince William Sound, Nome, Hoonah Sound, Crag/Klawock, and the Sitka experimental spawn-on-kelp fishery.

All of the kelp harvested for the experimental fishery was from a single bed that was estimated to be approximately 800 yards long and 50 yards wide. On April 9, 1998 the bed was re-visited by the department technicians that observed the kelp harvest. Three and one-half weeks after harvest there was no visually apparent change to the bed or any obvious evidence of harvest. More detailed studies of the kelp would be necessary to determine the impacts the harvesting.

PGA inspected kelp beds in the Sitka area (District 13) but found insufficient mature kelp to support the experimental fishery. Significant beds are known to exist in the Sitka area, however, kelp in the Sitka area has a later growing season than kelp in the more southerly areas of Southeast Alaska. The historic pattern of kelp harvest and the relatively early timing of the Sitka Sound herring spawn during recent years would suggest that District 3 would be an important source of kelp for a Sitka Sound spawn-on-kelp fishery. The concern of how increased harvest might affect kelp quality or availability to other spawn-on-kelp fisheries, which occur later during the season, would likewise require further research.

The amount of kelp harvested was determined by the contractor's bid amount, their need to cover expenses, and the size and amount of platform gear to be used. The department set no limits on the amount of kelp harvested. A total of 3,750 fronds were observed to be placed into pounds and fished. During the stringing of the kelp a number of excess fronds were culled out and discarded. Though an exact accounting of the number of fronds discarded was not obtained, it was estimated by department observers at approximately 400 fronds. An additional 31 fronds were sampled by the department and discarded. This would mean approximately 4,181 total fronds were harvested, a 10% smaller amount than the 4,584 calculated based on weights taken on the grounds in 1998. This discrepancy might be explained since the kelp weights obtained on the grounds were taken soon after harvest while in wet condition. The individual frond sampling was conducted 24 hours later and the fronds were well drained. The most accurate estimate of kelp harvest in 1998 is based on the product of the number of fronds harvested times the drained average weight of a frond, or 10,085 pounds (5.04 tons) rather than the measured grounds weight. In 1999 smaller numbers of heavier fronds were used. The kelp harvest for 1999 weighed 9,151 pounds (4.6 tons) as measured following draining and transport to Sitka.



Given the small number of platforms used in the experimental spawn-on-kelp fishery it was difficult to assess the potential for conflicts with the sac roe fishery and the subsistence roe-on-branch fishery. The only interaction between the sac roe fishery and the spawn-on-kelp fishery occurred when two platforms were towed through an area that was open to seining. Though no disruption to seining activity was noted a seine skiff being used to separate a seine boat from a tender in the process of pumping of herring made contact with a raft that was being towed to the grounds. The sac roe fishery targets herring just prior to spawning and this would be the time when spawn-on-kelp platforms would be actively placed on location to fish. The four rafts were fished close to shore and the specific locations of the rafts made it unlikely that the rafts would have interfered with seine sets if the area was concurrently open to sac roe seining. Certainly seine sets for sac roe herring do occur in shallower near-shore areas and it would have to be assumed that there would be some interaction between the two gears with the potential for conflict increasing with higher numbers of rafts.

Three of the rafts were located in areas traditionally used by subsistence roe-on-branch fishers and there were no reported conflicts between subsistence fishers and the spawn-on-kelp fishery. Here again, one would have to assume that the likelihood of conflict would increase as the level of effort in the spawn-on-kelp fishery increased. The four rafts occupied an insignificant area relative to the magnitude of the spawn.

Sitka Sound received a total of 65 nautical miles of spawn in 1998. Spawning occurred throughout northern Sitka Sound, the Eastern Channel area, Redoubt Bay, and Windy Pass. Spawn locations in northern Sitka Sound are shown in Figure 6. The most intense spawning occurred in the Middle Island, Kasiana Island, and Halibut Point area. In 1999 there was a total of 60 nautical miles of spawn. Estimated escapement was somewhat greater in 1999 with 43,173 tons compared with 35,518 tons in 1998. Spawning in 1999 occurred throughout northern Sitka Sound, in Jamestown Bay, Eastern Channel, and Aleutkina Bay (Figure 10). Spawn mileage for both years was roughly comparable, however, intensity of spawn around raft fishing locations appeared greater in 1998. Somewhat better product quality produced in 1998 is reflective of spawn intensity at raft locations.

Observations of the rafts during routine aerial spawn surveys showed that spawning herring appeared to be attracted to the suspended kelp. In two platforms, active spawn (herring milt) could be seen in and around the platforms before spawning activity was evident along adjacent shoreline. It is well documented that *Macrocystis* kelp is a preferred herring spawning substrate and the presence of rafts in areas where little wild *Macrocystis* exists would logically attract spawning herring.

Stringing of kelp fronds and the harvesting of product were the most labor intensive activities during the experimental fishery. A total of 37 fishers were involved in stringing kelp and 33 fishers were involved in harvesting of product. The fast pace of the harvest made it difficult to account for losses of spawn-on-kelp blades breaking off the fronds or the loss of whole fronds into the water during harvesting. There were instances when two kelped lines became entangled and a number of entire fronds were lost. Though the exact amount of lost product could not be determined it was estimated that less than 1% of the blades were lost during harvest. Since claims had been made that any lost eggs hatch and survive, the department conducted an informal investigation by placing egg covered blades and stipe in a mesh bag and suspended it in the harbor. The mesh bags were periodically inspected and it appeared that no eggs survived to hatching, succumbing to bacteria and/or fungus. From department observations of the closed pound spawn-on-kelp fisheries, kelp generally begins to rot about 10 days after harvest, preceding herring egg hatch, which is about 21 days after the spawn. Accounting for discarded or lost product and eggs might be significant in fisheries where re-kelping is possible, but would be insignificant in Sitka Sound where there is generally only one major spawning event.



The spawn-on-kelp blades sampled by the department showed an increase in weight of 20% from the wet un-brined weight to the brined weight. In contrast, the total gross wet weight of spawn-on-kelp blades of 54,468 pounds increased by only 4.7% to 57,038 pounds of brined finished product. In 1999 the wet weight of spawn-on-kelp blades of 41,256 pounds increased by 4.5% to 43,131 pounds. The finished weight included all the product that was originally landed including the trim. The difference in weight increases between department sampling of 20% and industry sampling of around 5% can be explained by the fact that the brined spawn-on-kelp blades were placed in racks on edge for 1-2 hours to drain prior to grading, trimming, and weighing. The tote containing the department's samples was drained of brine but individual blades were not placed on racks for draining resulting in a higher retention of brine. The conversion factor derived in this study is based on un-brined product weight. In the event that deliveries are reported as brined weights then conversion of brined weight to un-brined weight would be necessary before applying the factor to determine the amount of herring utilized. Because the exact method of draining of either fresh or brined spawn-on-kelp product may result in a different weight, these methods should be standardized for the most accurate reporting on fish tickets.

In 1998 all of the fronds fished had good coverage of eggs. With 74% graded #2 or better the quality of the spawn-on-kelp product was considered excellent for an open pound fishery. The grades of spawn-on-kelp product generally correspond to the thickness of eggs and the uniformity of coverage on the kelp blade. Grading criteria are somewhat subjective and may vary between processing companies, between fisheries, or between seasons within a fishery. The processor, which graded the product from this fishery, acted as a broker for the contractor and provided for inspection of product from different fisheries by Japanese buyers to establish the price for each grade.

Production in 1999 of 43,131 pounds (21.56 tons) was 75.6% of production in 1998 of 57,038 pounds (28.5 tons). This difference is partly due to a 9.3% decrease in the amount of kelp used, but also was due to lesser egg coverage. Decreased coverage was reflected in less grade # 1, the same amount of grade # 2, and more grade # 3 in 1999 compared with 1998. Overall average price per pound was \$5.46 in 1998 and \$5.29 in 1999, a decrease of only 3%. Overall exvessel value was \$311,528 in 1998 and \$227,965 in 1999. Product from both years was successfully marketed. Lower value in 1999 is mostly due to lower production.

In the event there is an open platform fishery in Sitka Sound, there will be a need to manage the harvest to stay within the annual guideline harvest level (GHL) set for the fishery. Since the harvest in this fishery is in the form of a portion of the spawn instead of a portion of the herring population, the conventional use of fishery mortality does not apply. Provided that herring spawning is above some minimal (threshold) amount, there does not appear to be a relationship between the amount of spawn deposition and the subsequent recruitment of new herring into the population. Above the fishery threshold, now set at 20,000 tons, the potential impact of a spawn-on-kelp harvest is probably minimal when compared with the harvest of herring.

Studies from the 1998 experimental fishery developed a spawn-on-kelp to herring conversion factor of 0.273 with a 95% confidence interval of 0.247-0.299. This conversion rate is roughly similar to the rate of 0.21 used in management of the San Francisco Bay spawn-on-kelp fishery. Division of a given weight of spawn-on-kelp product by the factor indicates how much herring was utilized to produce that amount. For the 1998 experimental fishery 99.7 tons of herring were utilized to produce 27.2 tons of product. Application of this factor to the 1999 experimental fishery indicates that the eggs from 75.6 tons of herring were utilized to produce 20.6 tons of product. For each 40' x 60' raft about 25 tons of herring was utilized in 1998, and 19 tons in 1999.

There may be a number of different ways to account for the amount of herring used in an open platform fishery in relation to the annual guideline harvest level (GHL). Directly subtracting the amount of herring



utilized to produce spawn-on-kelp from the GHL would result in a more conservative harvest rate than removal of the same amount of herring sac roe since there is no direct mortality. A determination of the impact on a herring population in terms of loss of future production from decreased spawn would be difficult, since recruitment is so variable from year to year and is poorly correlated to spawn deposition. The choice of a method to account for the use of eggs from a herring stock may depend on social or allocation considerations as well as biological considerations.

In summary, an open platform spawn-on-kelp fishery in Sitka Sound has been shown to be an economically viable option by the results of the 1998 and 1999 experimental fisheries. There do not appear to be any biological or fishery management related concerns with this potential new fishery provided there is an appropriate regulatory structure and management program. Depending on the amount of gear allowed there is some potential for conflicts with subsistence fishers or with sac roe fishers, although there were no conflicts observed during the test fisheries.

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Table 1. Details of fishing activity of individual rafts fished in the Sitka Sound experimental spawn-on-kelp fishery.

| Platform | Date of Raw Kelp Harvest | Date/Time Kelp Introduced | Date/Time Platform Fishing | Location of Platform | Latitude and Longitude | Date/Time Platform Towed To Harvest Area | Numbers of Days Platform In Active Spawn | Date Platform Harvested | Total Number of Lines | Total Number of Fronds | Pounds of SOK Product (Not Brined) | Pounds of Finished SOK Product (Brined) |
|----------|--------------------------|---------------------------|----------------------------|----------------------|-----------------------------|--|--|-------------------------|-----------------------|------------------------|------------------------------------|---|
| B-1 | 16-Mar | 18-Mar 3:00 a.m. | 20-Mar 12:00 noon | East Kastana Is | 57°05'00" N 135°24'58" W | 24-Mar 5:30 p.m. | 2 | 25-Mar | 36 | 1,080 | 13,306 | 13,968 |
| B-2 | 16-Mar | 18-Mar 3:00 a.m. | 20-Mar 8:30 p.m. | Halibut Point | 57°06'47" N 135°23'45" W | 23-Mar 8:00 p.m. | 3 | 24-Mar | 30 | 900 | 12,332 | 10,540 |
| K-1 | 16-Mar | 18-Mar 3:00 a.m. | 19-Mar 7:00 p.m. | South Middle Is | 57°05'23" N 135°26'15" W | 24-Mar 4:30 p.m. | 3 | 25-Mar | 30 | 900 | ** | *** |
| K-2 | 16-Mar | 18-Mar 3:00 a.m. | 19-Mar 5:45 p.m. | South Middle Is | 57°05'15" N 135°26'35" W | 24-Mar 5:00 p.m. | 3 | 25-Mar | 29 | 870 | ** | *** |
| Totals | | | | | | | | | 125 | 3,750 | 54,468 | 57,038 |

** Total weight of spawn-on-kelp harvested from platforms K-1 and K-2 was 28,830 pounds.
 *** Total finished weight of spawn-on-kelp harvested from platforms K-1 and K-2 was 32,530 pounds.



Table 2. An accounting of weight by grade of spawn-on-kelp by raft and value by grade for product harvested in the 1998 Sitka Sound spawn-on-kelp fishery.

| Lot | #1 | #2 | #3 | #4 | #5 | #5-P | #5-T | Total |
|---------------------|--------------|---------------|--------------|-------------|-------------|-----------|-----------|---------------|
| Platform Pounds | 1,054 | 6,936 | 1,666 | 272 | 442 | 102 | 68 | 10,540 |
| B-1 Percentage | 10% | 66% | 16% | 3% | 4% | 1% | 1% | |
| Platform Pounds | 1,335 | 8,274 | 2,992 | 493 | 791 | 83 | - | 13,968 |
| B-2 Percentage | 10% | 59% | 21% | 4% | 6% | 1% | 0% | |
| Platform Pounds | 9,296 | 14,718 | 4,386 | 696 | 0% | 884 | 2,040 | 32,020 |
| K-1, K-2 Percentage | 29% | 46% | 14% | 2% | 0% | 3% | 6% | |
| Sample Pounds | 136 | 238 | 34 | - | | 68 | 34 | 510 |
| Lot Percentage | 27% | 47% | 7% | 0% | 0% | 13% | 7% | |
| Total Pounds | 11,821 | 30,166 | 9,078 | 1,461 | 1,233 | 1,137 | 2,142 | 57,038 |
| Percentage | 21% | 53% | 16% | 3% | 2% | 2% | 4% | |
| Value Price/Pound | \$ 7.58 | \$ 5.78 | \$ 4.40 | \$ 3.21 | \$ 1.19 | \$ 0.45 | \$ 0.45 | |
| Total Value | \$ 89,603.18 | \$ 174,359.48 | \$ 39,943.20 | \$ 4,689.81 | \$ 1,467.27 | \$ 511.65 | \$ 963.90 | \$ 311,538.49 |





Table 3. Comparative summary of fishery statistics for the 1998 and 1999 experimental spawn-on-kelp fisheries.

| Description | 1998 | 1999 |
|---|----------------------|----------------------|
| Date of kelp harvest | March 16 | March 21 |
| Location of kelp harvest (lat./Lon.) | 55°49'30"/133°31'24" | 55°49'59"/133°35'27" |
| Total pounds of <i>Macrocystis</i> kelp harvested | 10,085 | 9,151 |
| Mean weight of fronds (g) | 984 | 1,441 |
| Mean number of blades per frond | 15.7 | 21.3 |
| Mean weight of blades (g) | 47 | 65 |
| Mean width of blades (cm) | NA | 18 |
| Mean length of blades (cm) | NA | 77 |
| Mean length of fronds (cm) | NA | 233 |
| Number of 40' x 60' rafts fished | 4 | 4 |
| Total number of fronds fished | 3,750 | 2,880 |
| Total number of blades fished | 58,875 | 60,480 |
| Dates of major spawning in Sitka Sound | March 21-25 | March 22-30 |
| Dates rafts actively fishing | March 19-23 | March 23-28 |
| Total pounds of spawn-on-kelp (pre-brined) | 54,468 | 41,256 |
| Total pounds of spawn-on-kelp brined and graded | 57,038 | 43,131 |
| Average price/pound of spawn-on-kelp product | \$5.46 | \$5.29 |
| Total value of spawn-on-kelp | \$311,528.47 | \$227,964.68 |
| Mean weight (g) of brined, untrimmed blade of spawn-on-kelp | 495 | 430 |
| Mean number of eggs/g of spawn-on-kelp | 343 | 335 |
| Conversion of tons of spawn-on-kelp to tons of herring | 0.273 | *0.273 |
| Tons of herring utilized to produce spawn-on-kelp | 99.7 | 75.6 |

* Conversion derived in 1998 used to calculate herring utilization.

$$\begin{aligned} \text{WEIGHT} / \text{NO FRONDS} &= \text{WT FROND} \\ 10,085 / 3750 &= 2.6893333 \quad (1998) \\ 9150 / 2880 &= 3.17708333 \quad (1999) \end{aligned}$$



Table 4. Primary measurements and parameter estimates used to estimate the conversion rate of weight of spawning herring to weight of spawn-on-kelp product.

| Verbal Description (include unit of measure) | Notation | Point Estimate or Measurement | Variance | Std. Error | Lower 95% CL | Upper 95% CL |
|--|-----------|-------------------------------|------------------------|---------------|-----------------|------------------|
| Total number of fronds | S | 3750 | 0 | | | |
| Mean wet weight (g) of <i>unbrined</i> , untrimmed blade of kelp w/ spawn | w_c | 414.84 | 44.82 | 6.69 | 401.71 | 427.96 |
| Mean wet weight (g) of <i>brined</i> , untrimmed blade of kelp w/ spawn | w_{abr} | 495.14 | 67.15 | 8.19 | 479.08 | 511.20 |
| Ratio mean weight brined:unbrined SOK blades (w_{abr}/w_c) | p_{ub} | 1.194 | 0.0005343 | 0.02 | 1.15 | 1.24 |
| Mean no. of eggs gram ⁻¹ wet field weight of brined eggs + kelp | e_{brk} | 342.8 | 25.5 | 5.05 | 332.9 | 352.7 |
| Mean number of eggs per stipe | e_{st} | 30,994.0 | 1,975,262.8 | 1,405.4 | 28,239.3 | 33,748.7 |
| Total grams of blades + eggs (SOK product) harvested (from fish tickets) | T_{FT} | 24,706,140.1 | 0 | | | |
| Total number of eggs on all harvest blades | E_b | 10,108,483,281.0 | 60,493,047,856,187,100 | 245,953,344.9 | 9,626,414,725.0 | 10,590,551,837.0 |
| Total number of eggs on all stipes | E_{st} | 116,227,527.5 | 27,777,132,820,516 | 5,270,401.6 | 105,897,540.4 | 126,557,514.6 |
| Total number of eggs (blades + stipes) | E_T | 10,224,710,808.5 | 60,520,824,989,007,700 | 246,009,806.7 | 9,742,531,587.4 | 10,706,890,029.6 |
| Fecundity (eggs/ton herring) | F | 102,567,376 | 18,240,591,376,284 | 4,270,900.5 | 94,196,411.0 | 110,938,341.0 |
| Tons of SOK product | W_{SOK} | 27.2 | 0 | | | |
| Tons of herring required for estimated spawn deposition on SOK platforms | W_H | 99.7 | 23.0 | 4.79 | 90.3 | 109.1 |
| Conversion - Tons SOK product per ton of herring (W_{SOK}/W_H) | C | 0.2732 | 0.000172671 | 0.01314 | 0.247 | 0.299 |

Table 5. Comparative summary of pounds and value by grade from the 1998 and 1999 experimental spawn-on-kelp fisheries.

| Grade | 1998 | | | | 1999 | | | |
|--------------|---------------|---------|-------------|----------------------|---------------|---------|-------------|----------------------|
| | Pounds | Percent | Price/Pound | Value | Pounds | Percent | Price/Pound | Value |
| 1 | 11,821 | 21% | \$ 7.58 | \$ 89,603.18 | 2,142 | 5% | \$ 6.13 | \$ 13,130.46 |
| 2 | 30,166 | 53% | \$ 5.78 | \$ 174,359.48 | 22,844 | 53% | \$ 6.13 | \$ 140,033.72 |
| 3 | 9,078 | 16% | \$ 4.40 | \$ 39,943.20 | 15,315 | 36% | \$ 4.54 | \$ 69,530.10 |
| 4 | 1,461 | 3% | \$ 3.21 | \$ 4,689.81 | 1,504 | 3% | \$ 2.94 | \$ 4,421.76 |
| 5 | 4,512 | 8% | \$ 0.65 | \$ 2,932.80 | 1,326 | 3% | \$ 0.64 | \$ 848.64 |
| Total | 57,038 | | | \$ 311,528.47 | 43,131 | | | \$ 227,964.68 |



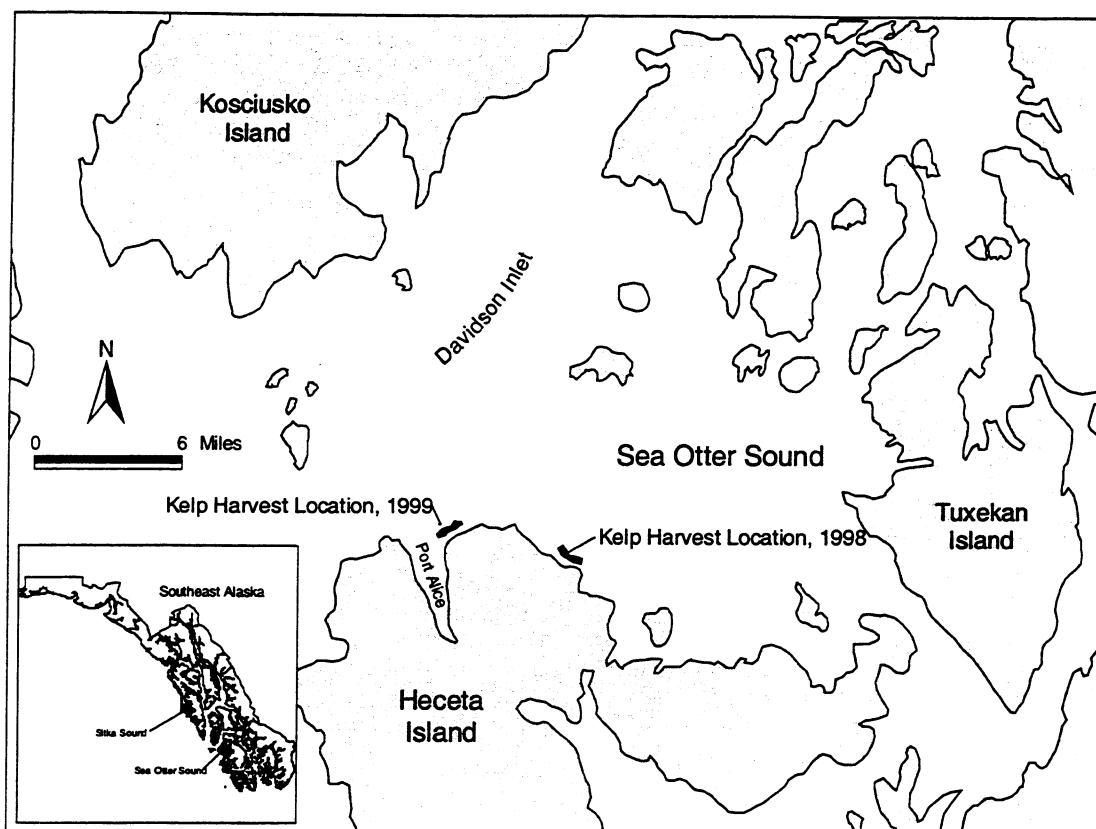


Figure 1. Map showing location of *Macrocystis* kelp harvest for the 1998 and 1999 experimental spawn-on-kelp fishery.

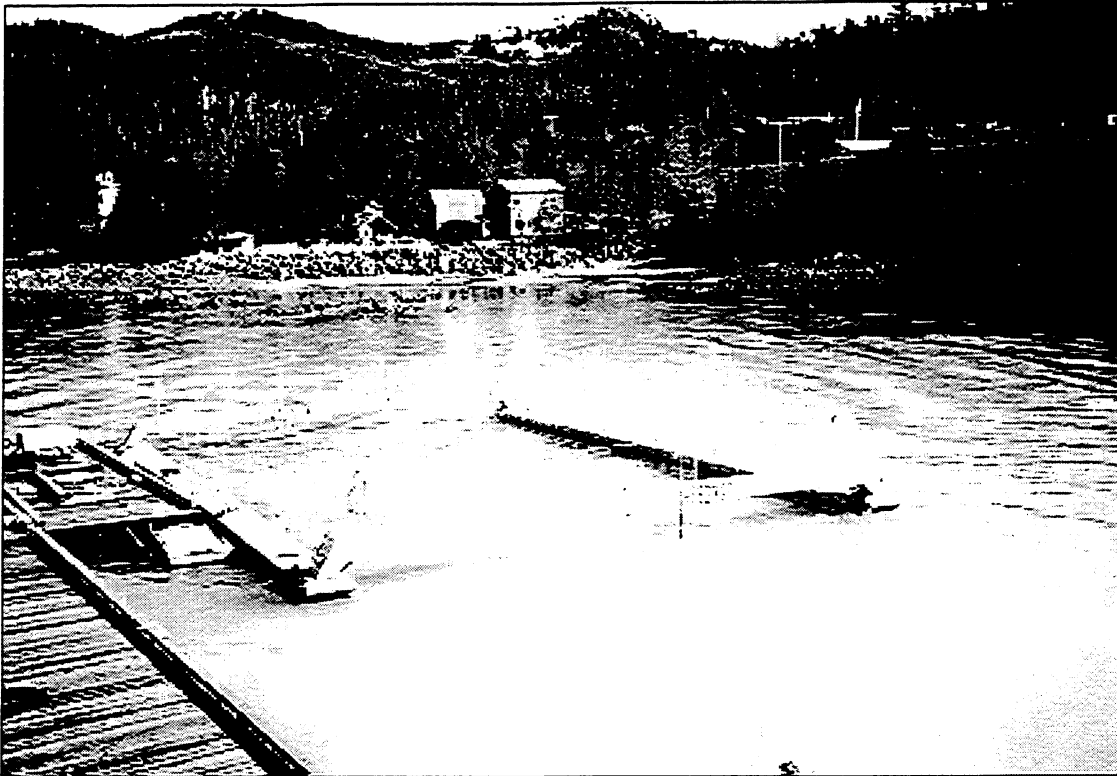


Figure 2. A photograph of one of the 60' x 40' rafts used in the experimental fishery. This raft was secured to a private dock along the Halibut Point Road system and actively fishing at the time the photo was taken.

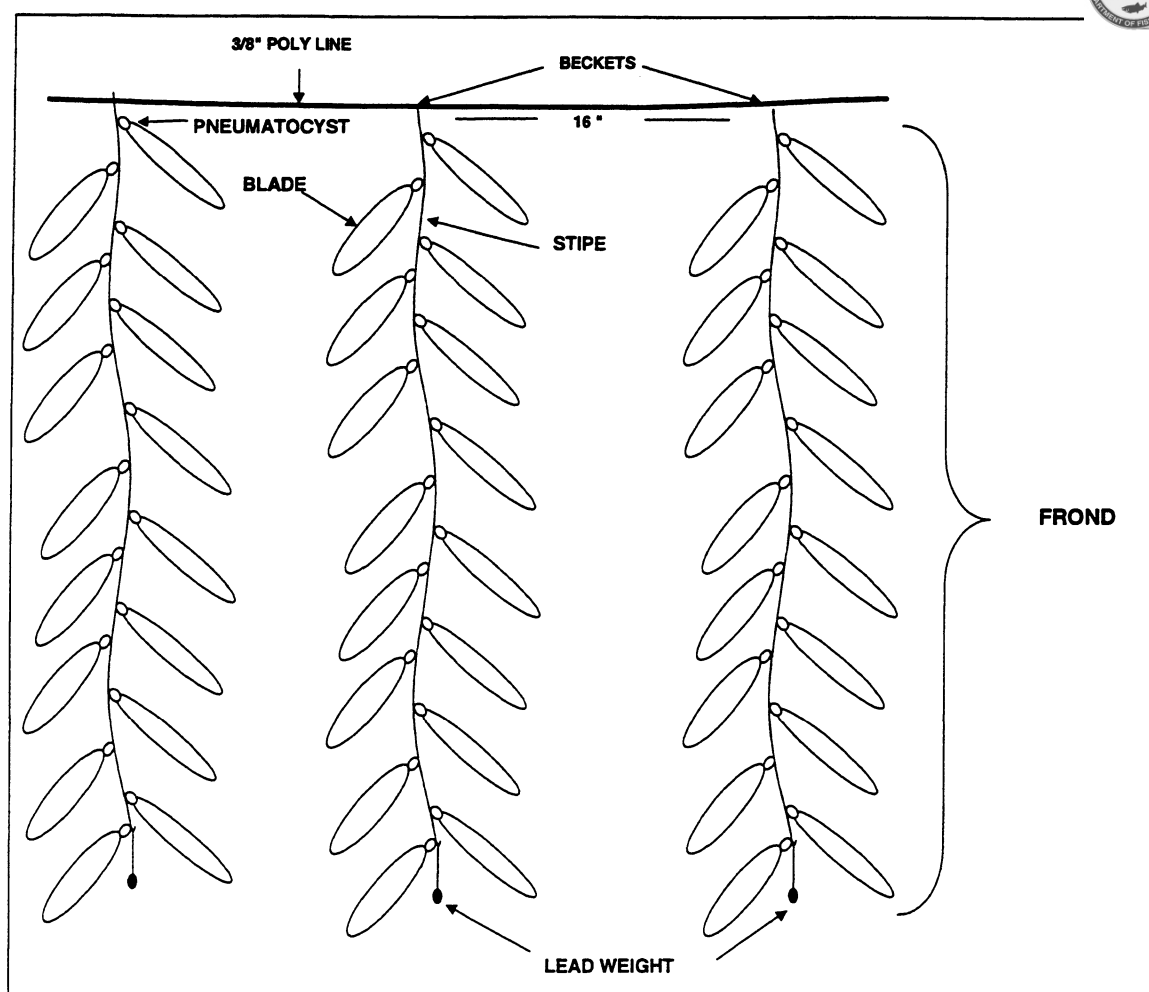


Figure 3. Description of *Macrocytis* kelp frond and a general picture of kelp rigged on to lines for attachment to raft.

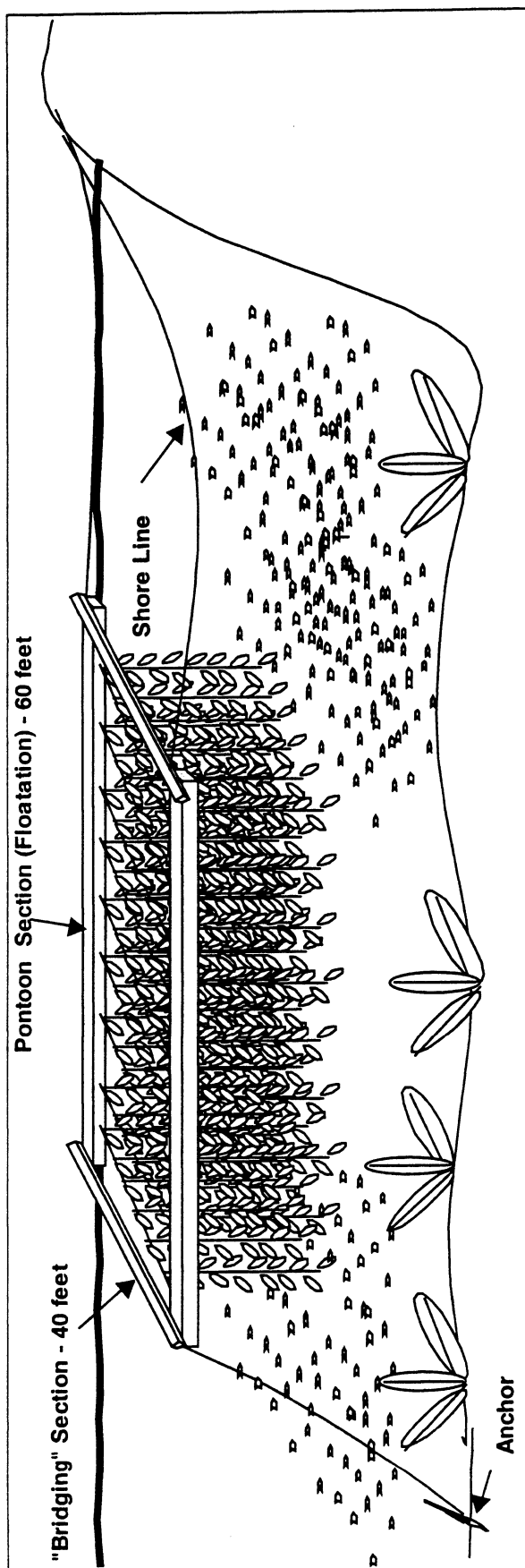


Figure 4. Generalized drawing of an open platform with kelp suspended and secured in place for fishing.

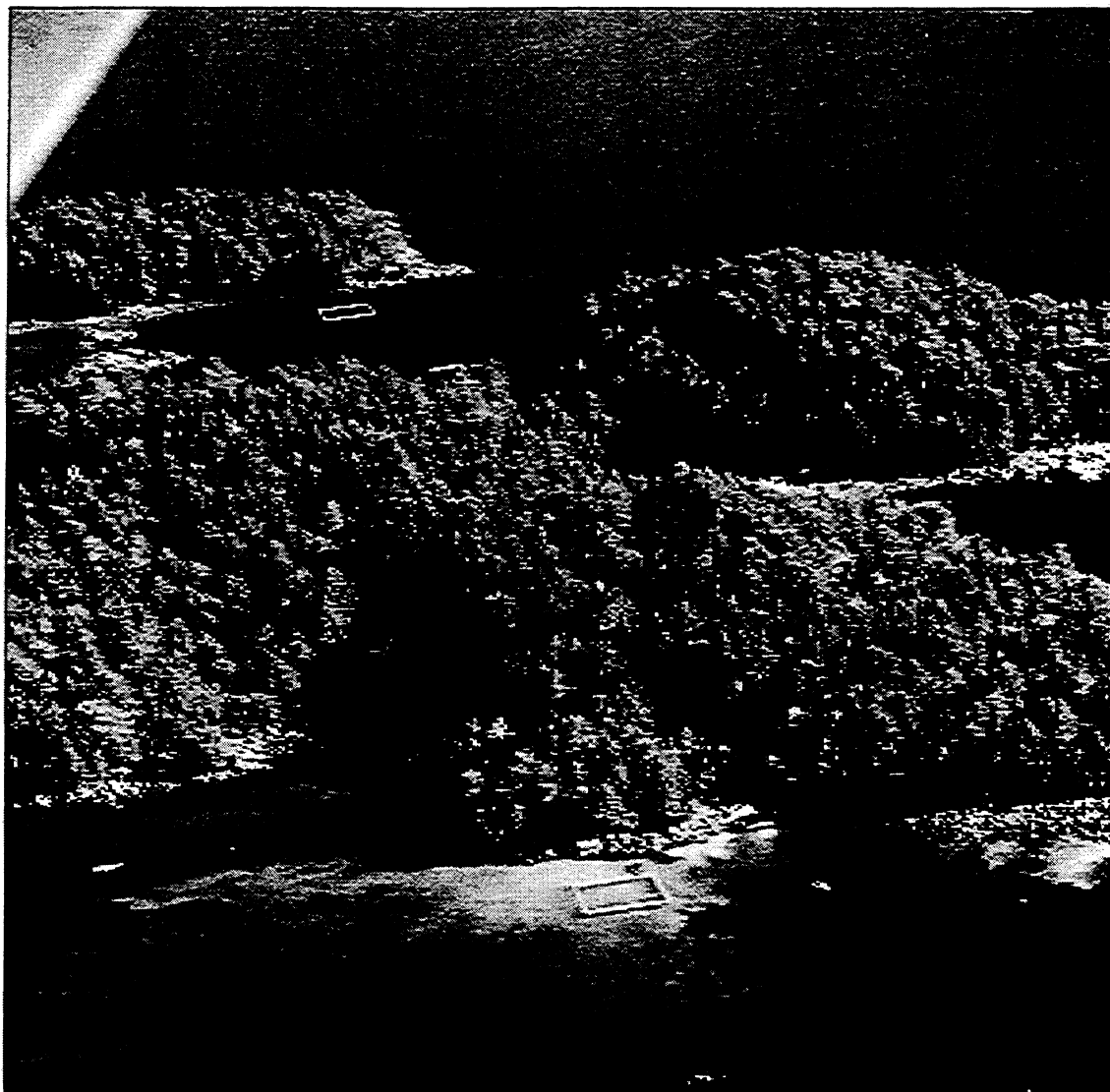


Figure 5. Photograph of two spawn-on-kelp rafts fishing off south Middle Island. Herring milt can be seen around the raft in the foreground of the photograph.

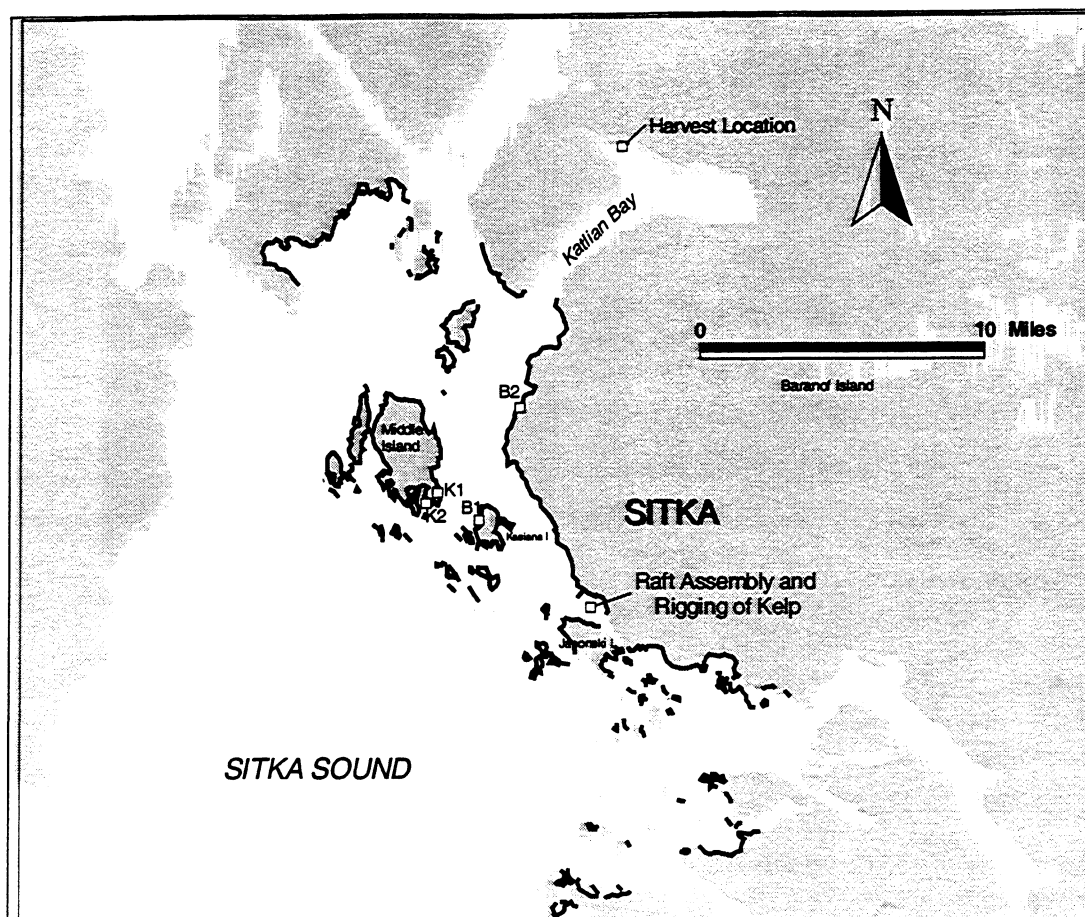


Figure 6. Map shows location of raft assembly and rigging of kelp, positioning of rafts for fishing (B1, B2, K1, and K2), and location of product harvest during the 1998 experimental spawn-on-kelp fishery in Sitka Sound. Also shows shoreline of northern Sitka Sound receiving herring spawn in bold black.

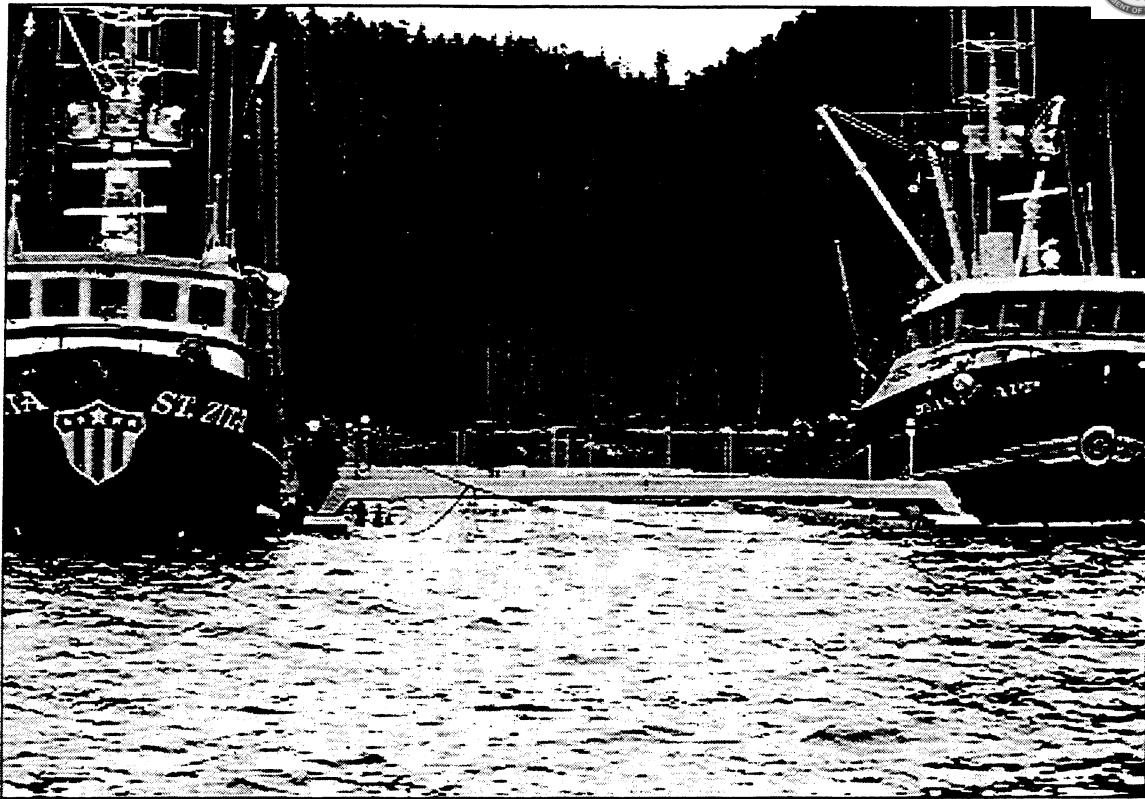


Figure 7. Photograph of seines vessels tied to either side of a spawn-on-kelp raft in preparation for harvesting.



Figure 8. Photograph of harvesters pulling fronds from a raft and transferring product to a processing table on board a seine vessel.

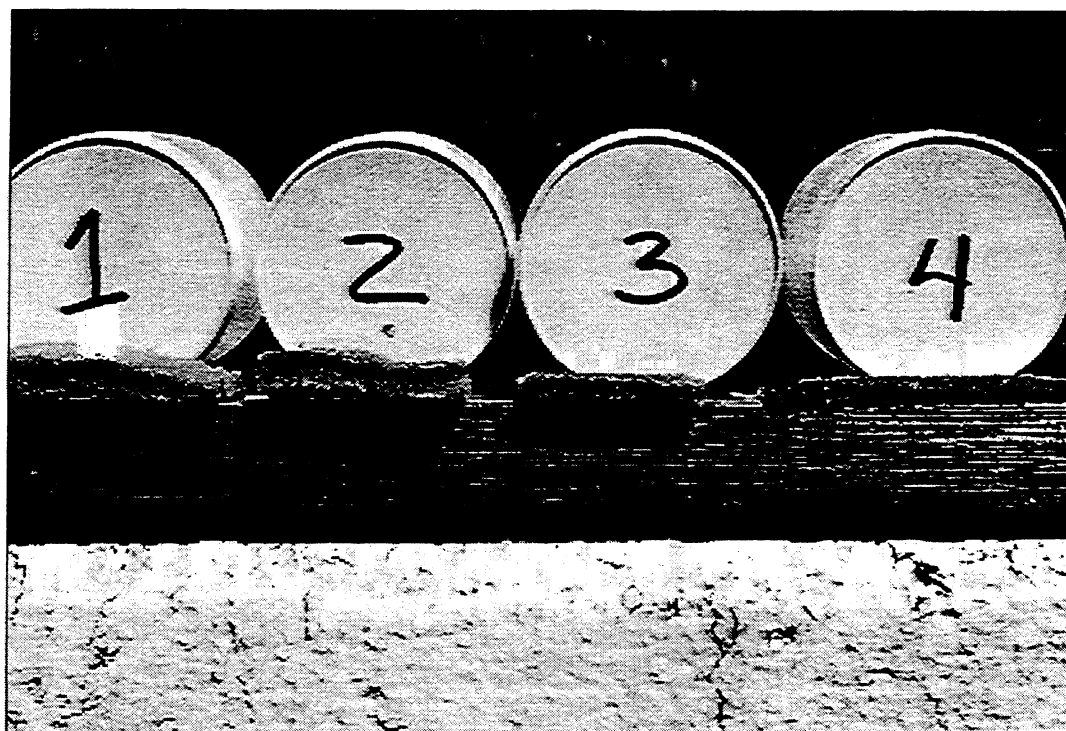


Figure 9. Cross-sectional view of spawn-on-kelp comparing relative thickness of eggs by grades 1 through 4.

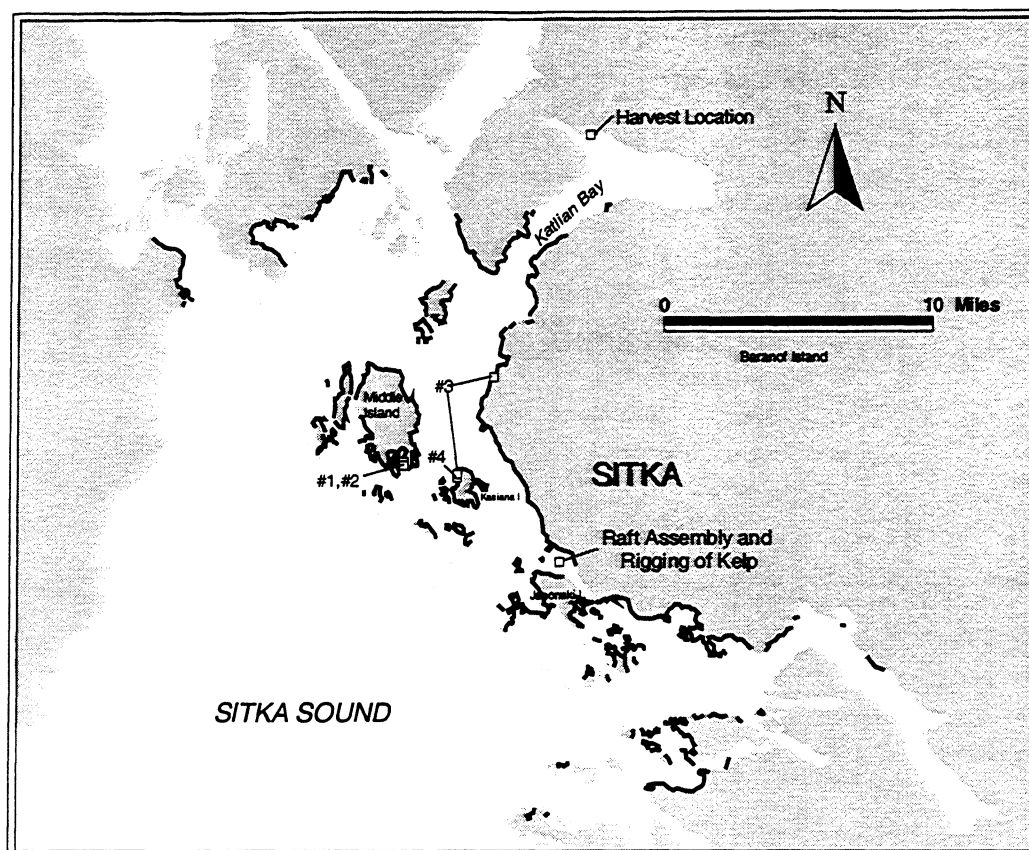


Figure 10. Map shows location of raft assembly and rigging of kelp, positioning of rafts for fishing (#1, 2, 3, and 4), and location of product harvest during the 1999 experimental spawn-on-kelp fishery in Sitka Sound. Also shows shoreline of northern Sitka Sound receiving herring spawn in bold black.



Appendix A. Experimental Fishing Gear Permit.

This permit authorizes Paul Gronholdt and Associates (PGA) to fish Open Harvest Platforms in Sitka Sound to produce herring spawn-on-kelp product for commercial sale to Kanaway Seafoods Inc. under contract with ADF&G as per bid number 11-122-98 and delivery order number 344635 as authorized by AS 16.05.050 (10) and according to the terms and conditions stated in this permit.

Paul Gronholdt and Associates includes the following individuals:

| | | | |
|-------------------|------------------|------------------|-----------------|
| Paul Gronholdt | Darrell Kapp | Robert Glenovich | Matt Luck |
| Ronald Porter | Alan Otness | Nels Otness | Bill Menish |
| Bill Glenovich | Jim Beaton | Joe Lindholm | Linda Lindholm |
| Terry Kilbreath | Scott McAllister | Philip Mundy | John Gissberg |
| Michelle Ridgeway | Mike Miller | Frank Footy | Dennis Thacker. |

The mailing address for Gronholdt and Associates is #1 Airport Road, P.O. Box 288, Sand Point, AK 99661.

Darrell Kapp (F/V Ryan D. Kapp) will be the individual responsible for coordinating fishing and harvesting activities. One or more of the above named individuals must be present when positioning rafts, when kelping rafts, and during all kelp harvesting activities.

The following vessels may be used when fishing and harvesting under this permit:

F/V Starrigavan, F/V Sea Prince, F/V Ryan D. Kapp, F/V St. Zita, F/V St. Francis, F/V Dorothy Jean, and/or F/V Commander. PGA will notify the department which vessels will fish and harvest spawn-on-kelp and may make vessel substitutions. All vessels and skiffs used must have a valid 1998 CFEC license. All crewmembers must have valid crewmember license or a valid CFEC license.

CONDITIONS OF PERMIT

1. PGA will provide the following gear and equipment: four 2,400 square foot kelp harvest platforms, fishing vessels and skiffs, 50 totes for harvesting spawn-on-kelp, 60 totes for brining spawn-on-kelp, airplanes and pilots as specified in their bid.
2. PGA will provide access to kelp, rafts, radios, GPS plotting equipment, scales, records and deck space for two department technicians to monitor, measure, and sample all aspects of the production of herring spawn-on-kelp throughout this test fishery including assembly of rafts, positioning of rafts, kelping of rafts, harvest of product, weighing of product, transporting of product, brining, grading, trimming and pailing of product.
3. PGA will notify the department technicians in advance when kelp will be placed in each raft and, 24 hours in advance prior to the initial harvest of spawn-on-kelp from each raft.
4. PGA must keep a log of kelp placement in each raft including the date of kelp placement, the number of lines with kelp, the number of stipes on each line, a typical number of blades of kelp on a stipe, and the total weight and volume of kelp used in each raft. Department technicians may assist with determining the average number of blades per stipe, average weight of stipe, and average weight of kelp blades.



5. PGA must keep a chart showing the daily position of each of the four platforms throughout the time when rafts have suspended kelp. Daily GPS latitude and longitude and the purpose of any raft movement should be included.
6. Mike Miller will coordinate raft placement with subsistence fishers. Bill Davidson or Dave Gordon (ADF&G, Sitka) must be informed of any potentially serious conflict or disputes with a subsistence user, and efforts will be made to resolve conflicts and to provide subsistence fishers with a reasonable opportunity to meet subsistence needs.
7. PGA must harvest all the spawn-on-kelp product and kelp from each platform. If harvested kelp does not meet standards for commercial sale and will be discarded, then PGA will inform the department technicians and obtain a total weight so they can take samples prior to discard. Otherwise, PGA will harvest all spawn-on-kelp into inventoried totes marked with tare weights. PGA will keep a log of the number of totes filled from each platform, total drained net weight of kelp in each tote, along with an estimate of product grade.
8. Department technicians will be allowed to sample and weigh selected stipes or individual blades (by position in raft and/or by grade if known), and will remove spawn-on-kelp samples from select areas of a blade for later analysis.
9. Upon delivery to Kanaway Seafoods, Inc. at the Seafood Producers Cooperative dock, total wet weight of unbrined product will be recorded by raft prior to trimming. Weight will be recorded of trim and scrap if removed prior to brining. If possible, the department will sample individual kelp blades by grade prior to brining and trimming.
10. All landings of will occur in Sitka on the department's test fish card. Fish ticket weight shall include total wet drained weight of product and trimmings, and final brined weight by grade of product sold. Department technicians will measure individual brined and drained blades by grade, and will collect subsamples of spawn-on-kelp by grade for later laboratory analysis. The department will work out any further details for sampling with PGA, Kanaway Seafoods, Inc., and SPC once the department's sampling design has been finalized.
11. PGA will provide the department a written draft test fishing report by May 15 and a final report by June 15, 1998. The report will include the following information: completed kelp harvest log book, log of kelp placement in each platform, log of daily raft position, spawn-on-kelp harvest inventory sheets, product inventory in processing plant, summary of any conflicts with subsistence fishers or with the sac roe herring fishery, report of advance payments to PGA, report of transport from Alaska, and report of final domestic sale in Bellingham, WA including final price by grade of product sold, report of product acceptance by foreign buyers, summary of number of fishers, crewmembers, and processing employees employed by each phase of the test fishery, and an overall narrative summary of activities. If final domestic sale occurs after June 30, 1998, then information concerning the final sale and product acceptance can be deferred until that information is available.
12. The department may impose additional conditions including time and area closures as deemed necessary for conservation and management purposes. In the event of unforeseen circumstances requiring additional measures, Bill Davidson will first discuss possible remedies with PGA representatives and try to work out an informal solution. The department, however, reserves the right to amend this permit if necessary.



13. This permit is valid when signed by the department and the permit holder, Paul Gronlund and Associates, and one copy must be available on each Fishing Vessel participating in this test fishery (vessels listed above).

Signature of Permit Holder _____ Date: _____

Signature of ADF&G Representative _____ Date: _____

Questions concerning this permit may be addressed to ADF&G, 304 Lake Street, Rm. 103, Sitka, AK 99835. ADF&G Phone number is (907) 747-6688.



Appendix B. *Macrocystis* Kelp Harvesting Permit.

This permit authorizes Paul Gronholdt and Associates (PGA) to harvest and transport *Macrocystis* kelp for use in the Sitka Sound Spawn-on-Kelp Experimental Fishery subject to the kelp harvest regulations (5AAC 37.300) and according to the terms and conditions stated in this permit. Paul Gronholdt and Associates includes the following individuals:

| | | | |
|-------------------|------------------|------------------|-----------------|
| Paul Gronholdt | Darrell Kapp | Robert Glenovich | Matt Luck |
| Ronald Porter | Alan Otness | Nels Otness | Bill Menish |
| Bill Glenovich | Jim Beaton | Joe Lindholm | Linda Lindholm |
| Terry Kilbreath | Scott McAllister | Philip Mundy | John Gissberg |
| Michelle Ridgeway | Mike Miller | Frank Footy | Dennis Thacker. |

The mailing address for Gronholdt and Associates is #1 Airport Road, P.O. Box 288, Sand Point, AK 99661.

Jim Beaton will be the individual responsible for coordinating kelp-harvesting activities. One or more of the above named individuals must be present during all kelp harvesting activities. The following vessels may be used in the harvest of kelp:

(Primary)F/V Starrigavan, (Substitutes) F/V Sea Prince, F/V Ryan D. Kapp, F/V St. Zita, F/V St. Francis, F/V Dorothy Jean, and/or F/V Commander. PGA will notify the department which vessels will harvest kelp and may make substitutions. All vessels and skiffs used must have a valid 1998 CFEC license.

CONDITIONS OF PERMIT

1. Jim Beaton or his designee will notify the department 24 hours in advance of any kelp harvesting activity which vessels will harvest kelp and where kelp harvesting activity is expected to take place.
2. The two department technicians assigned to the project will be allowed to inspect the fishing vessel prior to departure to verify current USCG Courtesy inspection within the past 12 months. The vessel operator will show the location of survival equipment including life raft, survival suits, fire extinguishers, first aid kit, etc. The operator will indicate deck working area, scales, GPS, and radios.
3. PGA will provide bunk space and meals for the two department technicians while aboard the kelp-harvesting vessel so they may photograph and make video recordings of kelp harvesting activities during at least the first two days of kelp harvesting activities. PGA will provide some limited deck space for the two department technicians to measure, quantify, and sample kelp harvested.
4. There is no set limit on the amount of kelp to be harvested, however it is expected that 40-45 totes will be harvested for this project, consistent with providing kelp for four 40' x60' kelp rafts.
5. PGA will weigh and inventory each tote of kelp harvested, and fill out kelp harvest logbook information including: harvest location description, GPS latitude and longitude of kelp beds harvested, dates of harvest, amount (volume, weight, and number of stipes) harvested by location, platform number of use, and of kelp discarded.



6. Department technicians will either depart on the kelp harvest cruise or will fly out and meet the kelp harvest vessel by floatplane. Arrangements will be made so department technicians can be aboard either their own or PGA's skiff to observe kelp harvesting activities.

7. Department technicians will require some limited samples of kelp stalks such as used by PGA.

8. This permit allows the harvest of *Macrocystis* kelp in regulatory Districts 3 through 13 except that the following areas will be closed:

Section 13-B: will be closed in waters of Sitka Sound east of a line from Shoals Point to the northernmost tip of Legma Island to the northernmost tip of Rachek Island and then to point on the Lodge Island shoreline at 56°46'06" N. latitude, 135°16'46" W. longitude (located just north of First Narrows on the southern entrance to West Crawfish Inlet).

District 5: will be closed north of the latitude of Ruins Point.

District 3: will be closed south of the latitude of Tonowek Narrows.

District 4: will be closed (only in Statistical Area 104-30) south of the latitude of Cape Bartolome, in all waters of Bucarelli Bay, and north of the latitude of Cape Lookout.

Other Areas: any area where herring spawning is occurring or expected to occur may be closed.

9. This permit must be in the possession of the kelp harvest at all times while harvesting and delivering kelp, and is valid when signed by a representative of PGA and by the department.

10. Methods used to harvest kelp must be in accordance with 5 AAC 37.300.

11. This permit is valid when the PGA contract with the State of Alaska is in effect from March 6, 1998 through June 30, 1998.

12. The logbook information requested on this permit must be turned into ADF&G Office in Sitka when spawn-on-kelp product has been harvested and no further kelp harvesting is necessary.

Signature of Permit Holder _____ Date: _____

Signature of ADF&G Representative _____ Date: _____

This permit may be returned by mail to ADF&G, 304 Lake Street, Rm. 103, Sitka, AK 99835. ADF&G Phone number is (907) 747-6688



6. Department technicians will either depart on the kelp harvest cruise or will fly out and meet the kelp harvest vessel by floatplane. Arrangements will be made so department technicians can be aboard either their own or PGA's skiff to observe kelp harvesting activities.
7. Department technicians will require some limited samples of kelp stalks such as used by PGA.
8. This permit allows the harvest of *Macrocystis* kelp in regulatory Districts 3 through 13 except that the following areas will be closed:

Section 13-B: will be closed in waters of Sitka Sound east of a line from Shoals Point to the northernmost tip of Legma Island to the northernmost tip of Rachek Island and then to point on the Lodge Island shoreline at 56°46'06" N. latitude, 135°16'46" W. longitude (located just north of First Narrows on the southern entrance to West Crawfish Inlet).

District 5: will be closed north of the latitude of Ruins Point.

District 3: will be closed south of the latitude of Tonowek Narrows.

District 4: will be closed (only in Statistical Area 104-30) south of the latitude of Cape Bartolome, in all waters of Bucarelli Bay, and north of the latitude of Cape Lookout.

Other Areas: any area where herring spawning is occurring or expected to occur may be closed.

9. This permit must be in the possession of the kelp harvest at all times while harvesting and delivering kelp, and is valid when signed by a representative of PGA and by the department.
10. Methods used to harvest kelp must be in accordance with 5 AAC 37.300 (~~Xerox copy is attached~~).
11. This permit is valid when the PGA contract with the State of Alaska is in effect from March 6, 1998 through June 30, 1998.
12. The logbook information requested on this permit must be turned into ADF&G Office in Sitka when spawn-on-kelp product has been harvested and no further kelp harvesting is necessary.

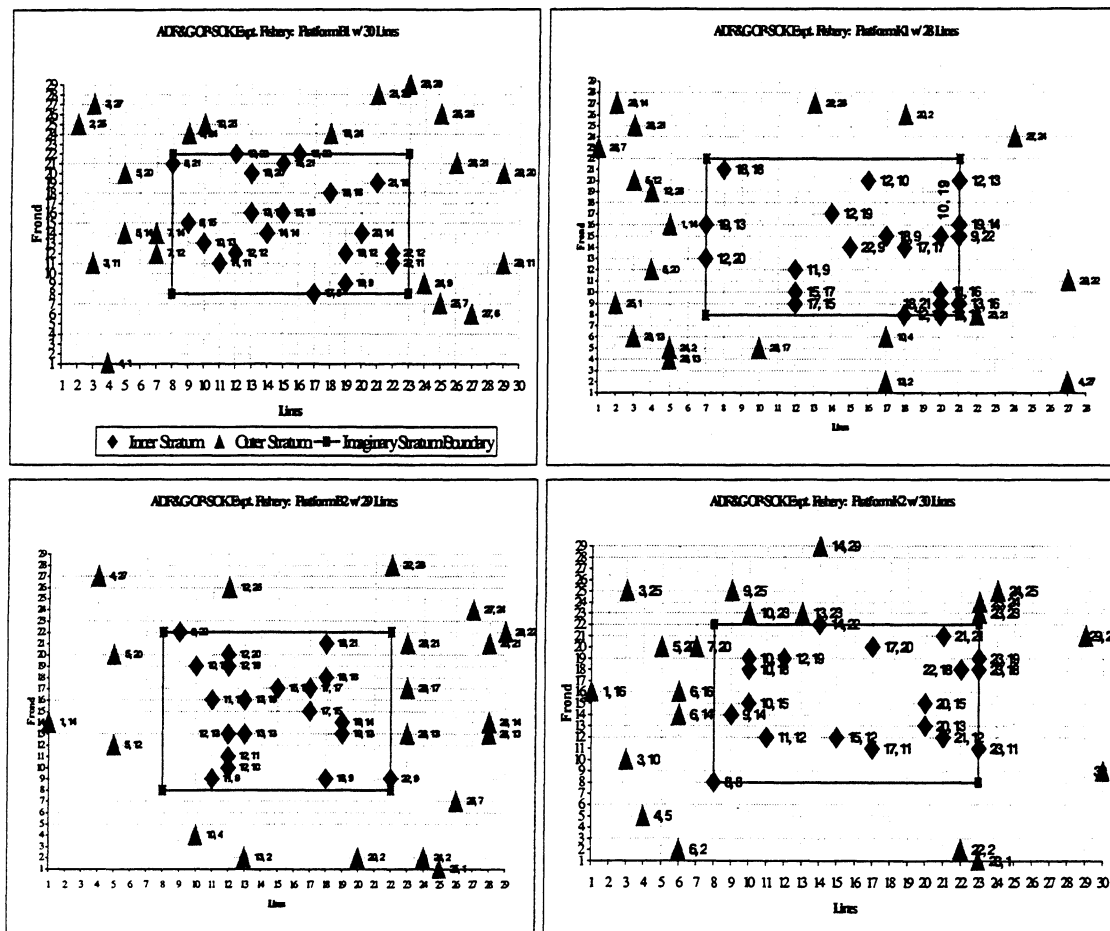
Signature of Permit Holder _____ Date: _____

Signature of ADF&G Representative _____ Date: _____

This permit may be returned by mail to ADF&G, 304 Lake Street, Rm. 103, Sitka, AK 99835. ADF&G Phone number is (907) 747-6688



Appendix C. Random locations of fronds sampled from platforms B1, B2, K1, and K2.





Appendix D. Notation of symbols used in statistical analyses. Formulae are shown in Appendices E and F.

α = estimate of intercept for the linear regression of # eggs vs. female body weight (g)
 β = estimate of slope for the linear regression of number of eggs vs. weight (g) of female body wt.
 C = ratio of the weight of spawn-on-kelp product (tons) to the estimated weight of spawning herring (tons) required to produce that SOK product; the conversion rate of herring to SOK product (fish ticket wt.)
 E_b = estimated total number of eggs on all kelp blades from all SOK platforms
 E_{st} = estimated total number of eggs on all kelp stipes from all SOK platforms
 E_T = estimated total number of eggs (on blades + stipes) from all SOK platforms
 e_{brk} = mean no. of eggs \cdot gram⁻¹ wet field weight of brined kelp + eggs
 e_{brkgh} = the mean number of eggs per gram of brined eggs + kelp in position stratum g , platform stratum h .
 e_{brkghi} = the estimated mean number of eggs per gram of brined eggs + kelp on blade i , in position stratum g , platform stratum h .
 e_{eghi} = the estimated mean number of eggs per gram on the kelp blade section from blade i , in position stratum g , platform stratum h .
 e_{ghi} = the measured weight (g) of eggs only on the kelp blade section from blade i , in position stratum g , platform stratum h .
 e_{ghij} = the count of number of eggs in 1 gram of eggs in egg subsample j , from the kelp blade section from blade i , in position stratum g , platform stratum h .
 e_{st} = estimated stratified mean number of eggs per stipe
 e_{stgh} = estimated mean number of eggs on stipes within positions stratum g , platform stratum h
 e_{stghi} = estimated total number of eggs on stipe i , from position stratum g , platform stratum h
 e_{stsghi} = enumerated total number of eggs on the subsection of stipe i , from position stratum g , platform stratum h
 e_{Tghi} = the estimated total number of eggs on the kelp blade section from blade i , in position stratum g , platform stratum h .
 F = herring fecundity; i.e. estimated number eggs \cdot ton⁻¹ of male and female herring
 F_f = herring fecundity [number of eggs \cdot ton⁻¹ of herring (female only)]
 G_{brkgh} = a weighting factor that accounts for the proportions of brined kelp blades in both the population (i.e. from all platforms) and the sample
 G_{ebrgh} = a weighting factor that accounts for the proportions of brined kelp blades in both the population (i.e. from all platforms) and the sample
 G_{egh} = the weighting factor for the weight of unbrined blades of kelp + spawn that accounts for the proportions of brined kelp blades in both the population (i.e. from all platforms) and the sample
 G_{stgh} = a weighting factor that accounts for the proportions of kelp stipes in both the population (i.e. from all platforms) and the sample
 N = estimated total number of blades on all fronds from all strata
 n_{brk} = number of brined blades (kelp + spawn) sampled from all strata to obtain egg counts
 n_{brkgh} = the number of brined blades sampled to obtain egg counts in position stratum g , platform stratum h
 n_{brkg} = number of brined blades (kelp + spawn) sampled from to obtain egg counts from position stratum g , across all platform strata.
 n_{brkh} = the number of brined blades sampled in platform stratum h , across all position strata.
 n_e = number of blades (kelp + spawn) sampled from all strata.
 n_{ebr} = number of brined blades (kelp + spawn) sampled from all strata
 n_{ebrg} = the number of brined blades sampled in position stratum g , across all levels of platform strata
 $n_{ebr,h}$ = the number of kelp blades sampled in platform stratum h , across all levels of position strata
 n_{ebrgh} = number of brined blades (kelp + spawn) sampled from platform stratum h and position stratum g
 n_{eg} = number of blades (kelp + spawn) sampled from position stratum g , across all platform strata.
 $n_{e,h}$ = number of blades (kelp + spawn) sampled from platform stratum h , across all position strata.
 n_{egh} = number of blades (kelp + spawn) sampled from position stratum g , platform stratum h .
 n_{st} = number of stipes sampled for eggs in all strata
 n_{stgh} = number of stipes sampled for eggs in position stratum g and platform stratum h
 P_{brkgh} = the estimated proportion of the total number of brined kelp blades from all platforms in position stratum g , and platform stratum h .
 P_{egh} = the estimated proportion of the total number of unbrined kelp blades from all platforms in position stratum g , and platform stratum h .
 P_{ebrgh} = the estimated proportion of the total number of kelp blades from all platforms in position stratum g , and platform stratum h .
 P_{stgh} = the proportion of the total number of fronds from all platforms in position stratum g , and platform stratum h .
 p_{ub} = estimated ratio of the mean weight unbrined to brined kelp blades + spawn

-continued-



Appendix D. (page 2 of 2)

S = total number of fronds from all platforms

s_{ghi} = the measured weight (g) of the section of brined eggs + kelp from blade i , in position stratum g , platform stratum h , sampled to estimate the mean number of eggs per gram.

τ = 1 ton expressed in grams; a constant

T_f = weighed total grams of brined blades + eggs harvested (from fish tickets)

W_H = Estimated weight of herring needed to produce the estimated total number of eggs from all SOK platforms.

W_{SOK} = Weight of spawn-on-kelp product (tons) from fish tickets; a constant.

w_e = estimated stratified mean weight (g) of **unbrined** blades of kelp + spawn

w_{ebr} = estimated stratified mean weight (g) of **brined** blades of kelp + spawn

w_{ebrgh} = mean weight of **brined** blades of kelp + spawn from platform stratum h , position stratum g

w_{ebrghi} = weight of individual **brined** blade i of kelp + spawn from platform stratum h , position stratum g

w_{egh} = mean weight of **unbrined** blades of kelp + spawn from position stratum g , platform stratum h .

w_{eghi} = weight of individual **unbrined** blade i of kelp + spawn from platform stratum h , position stratum g

w_{stghi} = measured weight of the entire stipe + eggs from frond i in position stratum g and platform stratum h

w_{stsghi} = measured weight of the a subsection of stipe + eggs from frond i in position stratum g and platform stratum h

x_{brkgh} = product of G_{brkgh} and e_{brkgh}

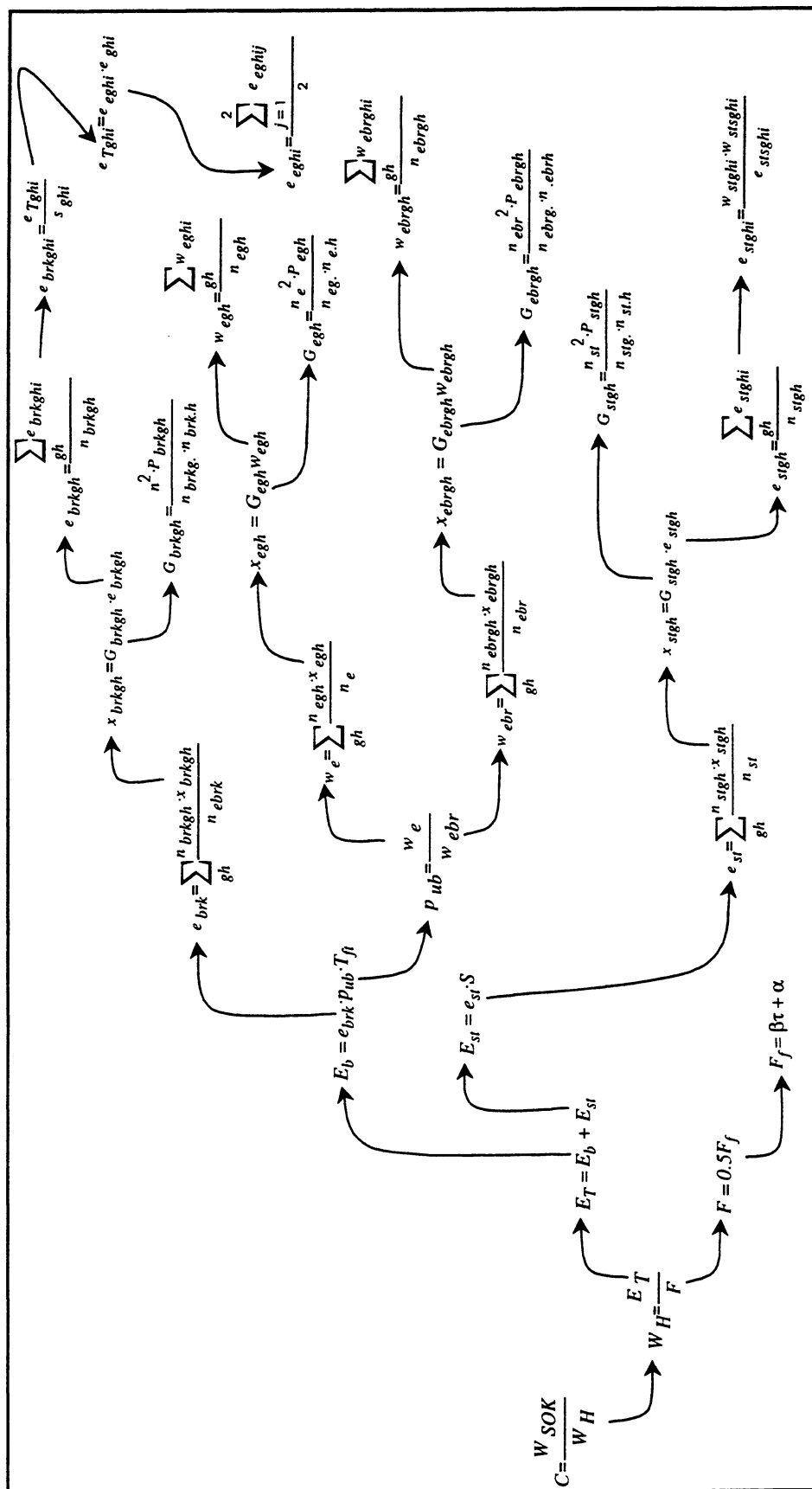
x_{ebrgh} = product of G_{ebrgh} and e_{ebrgh}

x_{egh} = product of G_{egh} and e_{egh}

x_{stgh} = product of G_{stgh} and e_{stgh}

Appendix E.

Association between point estimators and parameters for estimating the conversion rate, C , of spawning herring to spawn-on-keep product.



Appendix F. Variance estimator for C , as well as parameters which are precursors to C .

NOTE: The notation $Var(e, w)$ is a generic notation for the 2-way, stratified variance estimator applicable, with parameter-specific

values for n_{gh} , x_{gh} , $n_{g\cdot}$, $n_{\cdot h}$ and s_p^2 , associated with variance estimates for the parameters w_e , w_{elr} , e_{sl} and e_{brk}

$$Var(e, v) = \frac{(n-1)}{3} \frac{n}{n} \left[\frac{\sum_g \frac{n \cdot g}{n \cdot g - 1}}{\sum_h \frac{n \cdot g \cdot x \cdot g h}{h}} - \frac{\left(\sum_h \frac{n \cdot g h \cdot x \cdot g h}{h} \right)^2}{n \cdot g} \right] + \frac{\sum_h \frac{n \cdot h}{n \cdot h - 1}}{\sum_g \frac{n \cdot g h \cdot x \cdot g h}{g}} - \frac{\left(\sum_g \frac{n \cdot g h \cdot x \cdot g h}{g} \right)^2}{n \cdot h} \left[\frac{\sum_{gh} \frac{n}{n-1}}{\sum_h \frac{n \cdot g h \cdot x \cdot g h}{h}} - \frac{\left(\sum_{gh} \frac{n \cdot g h \cdot x \cdot g h}{h} \right)^2}{n} \right] + \frac{s \cdot p}{n} \left[\sum_{gh} (p_{gh} - f_1(n_{g \cdot n \cdot h}) \cdot G_{gh}) \cdot G_{gh} \right]$$

$$\rightarrow f_1(n_{g,n,h}) = \left(\frac{n-1}{2}\right) \cdot \left[1 + \left(\frac{(n-n_{g,n,h})}{n} \right) \cdot \left(\frac{1}{n_{g,n,h}-1} + \frac{1}{n_{h,n}-1} - \frac{1}{n-1} \right) \right]$$

$$Var(p_{ub}) = p_{ub} \left(\frac{Var(w_e)}{2} + \frac{Var(w_{ebr})}{2} \right)$$

$$\text{Var}(\beta\tau) = (\beta\tau)^2 \left(\frac{\text{Var}(\beta)}{\beta^2} \right)$$

$$\text{Var}(E_b) = E_b \left(\frac{\text{Var}(p_{ub})}{p_{ub}^2} + \frac{\text{Var}(e_{brk})}{e_{brk}^2} \right)$$

$$2 \frac{\text{Var}(e_{st})}{e_{st}^2} = E_{st}$$

$$s_{gh}^2(e_{st}) = \frac{\sum (e_{sighi} - e_{sigh})^2}{n_{gh} - 1}$$

$$\sum (e_{brkghi} - e_{brkgh})^2 \frac{g_h}{n_{gh} - 1}$$

$$s_{gh}^2(w_e) = \frac{\sum (w_{eghi} - w_{egh})^2}{n_{gh} - 1}$$

$$\rightarrow s_{gh}^2(w_{egr}) = \frac{\sum (e_{egrhi} - e_{egrgh})^2}{n_{gh} - 1}$$

$$s_p^2 = \frac{\sum_{g=1}^p (n_g - 1) s_g^2}{\sum_{g=1}^p n_g - p}$$

$$Var(E_T) = Var(E_b) + Var(E_{sl})$$

$$Var(W_H) = W_H^2 \left(\frac{Var(F)}{F^2} + \frac{Var(E_T)}{E_T^2} \right)$$

$$Var(C) = C^2 \left(\frac{Var(W_H)}{W_H^2} \right)$$

Appendix G. Exclusion of the covariance term in estimating the variance of p_{ub} .

One precursor parameter to the SOK product:herring conversion, C , is p_{ub} , the ratio of the mean weights of unbrined (w_e) to brined (w_{ebr}) SOK product (i.e. eggs + kelp). This ratio is based on individual kelp blades of SOK product weighed prior to brining and after brining. Particularly because the same kelp blades were weighed before and after brining, some covariance between w_e and w_{ebr} is expected, which would influence the variance of p_{ub} . However, in estimating the variance of p_{ub} , we did not account for the covariance term, due to the complexity of estimating the 2-way stratified covariance term. Normally, in estimating the variance of a ratio, any positive, non-zero covariance would reduce the overall estimate of variance (e.g. Stuart and Ord 1994). Therefore, our exclusion of the positive covariance term would be expected to increase the variance estimate of p_{ub} , and in turn, the variance estimate for C . However, this increase in the variance estimate for C , incurred by excluding the covariance term from the p_{ub} variance estimate, was expected to be relatively minor. As an indication of the probable magnitude of the difference in variance with and without the covariance term, we estimated C , with and without the p_{ub} covariance term included, analyzing the data under a 1-way stratified design, where the strata of interest was the platforms. While still an involved series of calculations, estimation of the stratified covariance term for a 1-way stratified design is more straightforward than that of a 2-way stratified covariance term. The variance of the 1-way stratified estimate of p_{ub} with and without the covariance term included was 0.0000944 and 0.0005961, respectively. The variances of the 1-way stratified estimate of C with and without the covariance term included for p_{ub} were 0.000144 and 0.000170, respectively. The 95% confidence limits for C with and without the p_{ub} covariance term were 0.253-0.300 and 0.251-0.302. The point estimates of p_{ub} and C remain unchanged regardless of whether or not the covariance term is included in the variance estimate for p_{ub} .



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SPAWN ON KELP MARKET TRENDS AND OPPORTUNITIES

Prepared by Seabridge Strategies Ltd for Blewett Associates Inc.

Introduction

Seabridge Strategies was retained by Blewett Associates Inc to contribute to a study of markets for spawn on kelp (SOK). Seabridge was asked to look at

- Trends in existing market segments and opportunities for increasing sales
- Opportunities for creating new consumers in either existing markets or new areas
- Actions that could be taken to expand markets for SOK

The analysis below is based on interviews with players in the SOK market on both sides of the Pacific, the expertise of the Canadian Embassy in both Tokyo and Seoul, local Japanese chefs and wholesalers, and the consultant's experience with other seafood products in Japan and elsewhere.

Spawn on Kelp

Spawn on kelp (SOK) or *kazunoko kombu* is a specialty seafood product composed of kelp covered with herring eggs, produced on the Pacific Coast of North America in San Francisco, British Columbia and Alaska and intermittently in Russia. Other potential producers such as Finland, Sweden and Atlantic Canada are considering developing similar products but with no real success to date.

In BC, spawn on kelp is produced using both open and closed pond methods although it is generally mixed product that is sold in the marketplace. BC product has a reputation, largely deserved, for better quality than San Francisco or Alaska. Open pond methods generally produce a thinner egg layer, while closed ponds produce a thicker layer that corresponds to top quality. Closed ponds offer more opportunity for controlling both intrinsic quality (silt and sand) and adapting to new market demands (thinner rather than thicker).

Raw product is trimmed, salted or brined on the grounds, then graded and packed into 32-37 lb plastic pails by custom processors for export to Japan or domestic sales.

Most SOK is sold to two or three reprocessors who slice and pack the product for seasonal and year round distribution. The largest, Taniya, accounts for perhaps 75 per cent of BC production and reprocesses a portion of its imports in China. In the past, at



least one company in BC was undertaking this process here but it now prefers to buy already processed product from one of the main reprocessors for sale through its own distribution system—"it reduces the level of risk," according to the company's principal.

SOK is not differentiated in the Japanese market place by country of origin.

SOK: the Market

Virtually the sole market for SOK is Japan. It occupies a very small, highly specialized niche, with no immediate substitutes although a number of different analogues such as herring roe from various producing regions and other processed roe products. Over the last decade, supply has varied from about 500 tonnes to almost 900 tonnes, a considerable variation given the tiny size of the market (the total salted/dried/smoked fish market is about 750,000 tonnes, of which herring roe in various forms makes up about 13,000 tonnes). There appears to be a fairly close co-relation between supply levels and price—the Canadian Embassy attributes the slightly higher prices in 2000 for SOK to the near-absence of US product in the market.

As a rare delicacy, SOK's traditional niche has been high end sushi shops and Japanese restaurants and the gift market where it was able to command high prices that in general provided good returns in most years to at least two of the three participants in the distribution chain (supplier, importer, reprocessor).

It is agreed by all that that traditional market has been in a state of radical flux since 1996 when landed and wholesale prices dropped first by 25 per cent, then by 50 per cent in response to changing market conditions in Japan. As one BC exporter put it "1997 was the year when the Japanese finally remembered that they are the only buyers for herring roe products...it's not likely that they will forget again."

There is less agreement over the overall direction of the market once it emerges from this state of change. Some suppliers and users are fairly confident that they can introduce new consumers to SOK, turning it from an occasional or seasonal product to an everyday one albeit at a lower price. Some believe that the everyday product and the expensive niche market can co-exist while others believe that "democratizing" SOK will inevitably lead to the demise of the high value niche. Some are keen to see an expansion in production, others think that restricting it is the only way to maintain high prices. It is, however, fair to say that everyone contacted by this researcher was in favour of a cautious approach to any expansion to reduce the likelihood of market disruption.

One other change in the market is worth noting: the number of buyers of SOK in Japan has dropped dramatically. In the 1980s, there were dozens of buyers for SOK, by the mid 90s more than 20, but now there are no more than three. This consolidation in part reflects the reduced Japanese tolerance for risk but also a determined effort on the part of some buyers to dominate the business. If this interpretation is correct, then high prices to suppliers may owe as much to speculation as to the inherent value of the product. It also raises the spectre of continued consolidation—this might result in higher prices to



producers in the short term but would leave them at the mercy of a single strong buyer later.

The Burst Bubble and the Japanese Seafood Market

One of the fundamental changes in the Japanese seafood market has been the fallout from the failure of the bubble economy in the early 1990s and the prolonged period of economic weakness since. The Nikkei average has dropped almost 2/3rds, auto production is down, land prices are down, business confidence continues to decline, unemployment is at record levels, the new megabanks are as unwilling as the old bands to deal with bad loans. The Japanese Chain Store Association and the Japanese Department Store Association continue to report declines in sales, there is little sign of deferred consumer demand and even less sign that what there is will express itself at the expensive restaurant, the department store or the supermarket. In 2000 expenditures on food declined by 1.9 per cent, the first real decline in a decade. The precariousness of many retailers is amply demonstrated by the filing for bankruptcy protection in September 2001 of Japanese grocery giant Mycal Corp. In short, despite occasional signs of life, recovery seems a long way on the horizon.

The impact on the seafood business has been considerable. Across the board, the wholesale price of high end products has dropped dramatically. Imports of “international” products (crab, shrimp, some salmon) have dropped as a result of competitive demand; wholesale prices of virtually all expensive items (lobster, shrimp, salmon, crab, herring roe, abalone, sea urchin roe) have dropped by at least 40 per cent and often as much as 75 per cent since 1997.

It’s not just that prices are down. One big change is the restricted access to credit by Japanese seafood companies following consolidation in the banking sector and the demise of institutions such as the Hokkaido Takushoku Bank. Tolerance of risk has dropped sharply throughout the seafood business and where this is combined with higher or even stable supply of raw material has invariably led to pressure on suppliers to take on more of the risk, primarily by accepting lower prices.

At the same time, tastes are changing too. Older Japanese—whose taste shaped the development of the SOK market—are hoarding their money not spending it. Disposable income is in the hands of the young who prefer to spend it on faster food, cheaper food, more international food, on eating out as inexpensive entertainment. Consumption of meat is growing, consumption of fish is falling, concerns about health are becoming more common and many traditional products—especially the time-consuming, heavily salted ones—are falling out of favour.

While the overall food market picture is bleak, it would be wrong to suggest that there are no opportunities. In an economic downturn, food is one of the items that people still have to buy. Consumption patterns may change but that only opens up new prospects where other ones decline. Japanese consumers still expect quality, they just want it at a reasonable price. As one supermarket buyer put it to me “everyone talks about price



destruction but this doesn't mean that Japanese consumers will accept poor quality products just because they're cheap. It didn't work for Daiei and it won't work for any other supermarket chain. We want good quality at a reasonable price and if Canadian suppliers can give me this I am happy to buy from them."

SOK Market Niches

1) The Established Niche: Expensive Restaurants

This niche has shrunk considerably as a result of the burst of the bubble, affecting many different items once largely the province of this segment (sashimi tuna, abalone, sea urchin roe). Before the mid-1990s this segment was primarily maintained by the expense account/entertainment trade provided for in the GS & A of many Japanese firms.

In the current economic/political climate, there is no prospect of a recovery in the foreseeable future in this kind of generous expense account business. As an example, for at least the last three years, North American exporters have found that instead of the lavish entertainment they were accustomed to on visits to Japan, they are going Dutch in cheap sushi bars or watching television in their hotel room instead. As noted, the impact is not limited to SOK but includes other expensive food service items.

2) The Established Niche: Gifts

The gifting industry was another of the first victims of the bubble failure. Gift giving in Japan falls into two categories: corporate and personal, both concentrated at the end of the year and during the summer Obon/Golden Week period. SOK, like top quality salted herring roe, has been a staple of gift packages. This market has shrunk considerably dramatically since 1995.

Lavish corporate gift giving is largely a thing of the past both as a cost cutting measure and because of a change in mores. Corporate gift giving was closely associated with the construction industry—a sector noted for both corruption and the large number of deadbeat companies on the verge of bankruptcy—and the powerful bureaucracies of MITI and MOF (trade and finance). Public opinion has turned sharply against overt dealing in favours and the gift business has felt the effect.

Personal gift giving has changed in a different way. It is still a common, even a growing custom, particularly in the summer but overall expenditure has declined and the range of possible gifts has expanded—SOK is no longer an immediate or a necessary choice.

The decline of the gift market for SOK—and for top quality herring roe—also ties in with demographic trends. Both products (and they are to some degree substitutable) are associated with older Japanese whose tastes dominated the first flush of postwar affluence. The Japanese trade has been concerned for at least the last 15 years (although it hasn't done much about it) that the demographic skew meant that end users were dying off without adequate numbers of new users coming into the market. Stories abound of



even top grade roe gift packages from Ihara Suisan (the market leader) are simply dumped into the garbage because the younger generation does not know how to desalt the product or cannot be bothered to go through the time-consuming process. SOK is no exception to this trend as it is not perceived as a ready to eat product.

On the corporate side, as decisions about gift giving fall into the hands of younger managers, SOK and herring roe are no longer automatic choices. The same is true on the personal side—any growth in gifting is coming from younger people, those less likely to choose traditional SOK.

If as recently as five years ago, the gift market accounted for about 10% of SOK, that percentage has dropped according to some estimates by about a half.

The traditional gift market thus offers little prospect of a recovery in either volume or value.

3) New Niches

At current supply levels, SOK is going to remain a specialized niche. Even so, the question remains whether there are any prospects for expansion at the top end of the market (accepting that this will still mean lower prices throughout the distribution chain).

Most importers/distributors of SOK believe that the market for top-grade SOK has been oversupplied (mainly because of the market shrinkage) and that opportunities lie in lower grade (or at least thinner) product for everyday rather than special occasion uses. Again, this mirrors what has happened to salted herring roe where the high end gift market is now estimated at less than 2,000 tonnes while all the growth has been in packages for everyday consumption. Maintaining current markets at relatively high prices would probably require a cut in production from all sources.

Given the poor prospects for revitalizing current markets, the Japanese trade led by Taniya is already engaged in developing new niches and new products. Canadian suppliers will need to think carefully about how best to participate in this process and how much of the risk—and the cost—they are willing to share. A brief analysis of the key opportunities follows.

4) Regional Expansion

It's commonplace to say that the main market for SOK is the Kanto (Tokyo region), if only because of the concentrated population and the ease of distribution. Some in the trade take the view that the Kansai (Osaka/Kobe/Kyoto) is more important because seafood consumers there are more discriminating, willing to pay higher prices, and attuned to the tastes of older Japanese.

In fact, the tiny size of the SOK supply and market means that it is an unfamiliar product to most Japanese even in metropolitan Tokyo. Market expansion is therefore akin to the



introduction of a completely new product—at anything other than a commodity level this is going to take a market development strategy backed by considerable expenditure. Indeed Taniya, the largest user, already estimates its marketing expenses in the C\$1 million range—an amount that may sound a lot but is in fact not very much given the cost of marketing activity in Japan.

Regions outside the Kanto and the Kansei offer considerable opportunities for new market development for food manufacturers. Kyushu, for instance, has a tightly concentrated population of 15 million (5 million in the Fukuoka area alone), a handful of regional supermarket chains, and offers better opportunities for developing a non-competitive distribution chain than either the Kanto or the Kansei.

5) Ordinary Sushi Shops, Take-out and Kaiten Sushi Shops

Ordinary sushi shops are less expensive than the high end shops which have traditionally been the market for SOK. The curtailment of spending by consumers has hit this level hard too, and the consumption of high priced seafood products (SOK, sea urchin roe, sashimi tuna, abalone, etc) in such establishments is not expected to recover in the near future either.

The main segment of the market where sales have increased over the last five or six years is fast food and take-out. The advent of McDonalds nearly 20 years ago has had a profound influence on the development of this segment of the market—creating the impetus for new chains offering fast, quick foods from different origins, making eating easier, faster and cheaper. Often this involved taking elements of traditional Japanese cuisine and redeveloping them into fast food items using much cheaper, imported raw materials—the beef bowls at Yoshinoya are a prime example. Sushi restaurants have not been immune to this trend—*kaiten* sushi bars (where diners choose from revolving, made in advance sushi plates) and take-out sushi, both of which do away with the need for highly trained chefs and increase potential volume have grown significantly. A couple of pieces of SOK sushi in one of these establishments might cost a fifth or even a tenth of the price of an ordinary or high end shop.

For the last few years, this sector has been characterized by brutal price-cutting, led by McDonalds with its half-price strategy. JETRO's most recent study of the eating-out market indicates, however, that take-out/fast food prices have dropped as low as they can and that success in this segment depends now on service, quality, better systems, and product differentiation.

This growth in take-out/*kaiten* shops and the current degree of price stabilization suggest opportunities for SOK, particularly for “lower” quality, lower priced product. Lack of familiarity may be the biggest barrier to increased growth here. It should also be noted that the traditional Japanese distribution structure is very much still in evidence even in newer segments of the market—according to one expert on the Japanese food market, there could be as many as eight or ten middlemen between seafood importer and a take-out sushi manufacturer in Gunma (a 2 million people market to the northwest of Tokyo).

6) Bento Boxes

Bento boxes, compartmentalized lunch boxes of pre-pared rice, vegetables and small portions of meat or fish, are a fast food staple in Japan at restaurants, department stores, train stations, and take-out shops, with the market estimated at 6-8 million boxes a day.

Many of the same trends—particularly the decline in prices—affect this segment of the market as the takeout/*kaiten* market. Indeed, NRE World Bento in California created a political storm in Japan this summer when it announced that East Japan Railway Co. had agreed to buy 20,000 made-in-California bento boxes a day, shipped by frozen container. NRE claimed that access to stable supplies of less expensive California rice enabled them to offset shipping costs and provide the railroad with roughly a quarter of its daily requirements for bento boxes at a very competitive price compared to its local supplier.

This kind of competition, while keeping a lid on prices, is also spurring competition in new product development—the range of acceptable products for bento is growing—and in new technology—microwaveable bentos or shelf stable bentos. Related opportunities also exist in the B & B (ryokan) and school lunch markets.

In a report in preparation for the BC Salmon Marketing Council and Fisheries Renewal BC, Calgary-based Nakodo Consulting suggests bento box manufacturers as one key avenue for BC seafood producers seeking to take advantage of the growing Japanese market for value-added food products. Nakodo cautions, however, that the market is very competitive, requiring significant new product development and marketing, and needs high volumes of successful products. Its advice is to pick a region, select a niche market, pursue three or four appropriately sized customers, then select one for an 18-month to 3 year development period.

7) New Product Development

The traditional SOK market reflected the taste of older Japanese. It does not appear that their preference has been handed down to the younger generation who dominate discretionary spending.

There are parallels here with other seafood products. Virtually every Japanese seafood trader will tell you that Canadian sockeye salmon is the best quality product and their own personal preference, but that their wives and certainly their children are perfectly happy with—and even prefer—farmed Atlantics.

Sellers of SOK—as with herring roe—have had no choice but to diversify into flavoured, ready to eat products. Virtually all users (with perhaps one exception) see this as the only way to expand the market. If the product is made ready for eating, whether by seasoning (with soy sauce, mirin, spices, etc) or processing into products combined with other materials, then there will be more consumers, especially more younger consumers. Only in this direction can any increased production be absorbed.



At this point, new product development for SOK is very much in its infancy, although some users such as Taniya are investing considerable funds in it. Taniya believes that by re-processing in China it may be possible to reduce costs sufficiently to revitalize traditional sushi sales. The company is also interested in specially trimmed, thick SOK (i.e. top quality) for high end, year end bento and osechi-box year end, in looking at ways to “internationalize” SOK, and in thin-cut SOK marinated with seaweed, wasabi, sake mirin, soy sauce, etc. Most users would agree that new product development for SOK is in its infancy and largely on a trial and error basis. It should also be pointed out that new product development is an expensive and on-going process—many new products targeted at the younger generation have a shelf life of only a couple of years before they are replaced by something else.

Other users are convinced that the future of SOK lies in home-use, that is development of retail markets, especially if production increases. Here again, one trend to take into account is the desire for fast, convenient products—Nakodo Consulting identifies the breakfast market as one of opportunity, citing the growth in ready to eat or pre-cooked items that only need to be dipped in boiling water. Another trend identified by Nakodo, however, is the willingness of some consumers to spend money on top quality products at retail as compensation for foregoing eating out at expensive restaurants.

While SOK has always been available at the retail level, it is only recently that it has been identified as a market opportunity. The previous lack of development is probably due to the unfamiliarity of the product and tight supply which precluded development of this segment of the market.

8) Opportunities Outside Japan

Some marketers of food products have found opportunities in ethnic markets closer to home—BC farmers for instance have started growing wasabi for the burgeoning Japanese restaurant business while Shuswap Tofu has found Japanese restaurants and retail outlets in the Lower Mainland willing to pay a premium for its organic tofu.

One of the trends in the North American food service business has been the explosive growth in Japanese restaurants at every level from high priced sushi to noodle and gyoza shops, a growth that far exceeds the growth in the population of Japanese-Canadians/Americans. This growth is generally attributed to two factors—the predilection for Japanese food by ethnic Chinese and its enthusiastic acceptance by affluent Caucasians. Unfortunately for SOK, neither group of customers is familiar with SOK or immediately drawn to it.

Conversation with Japanese chefs and wholesalers in Vancouver suggests that most SOK product is local (rather than reexported from Japan) but that opportunities for expansion are limited to non-existent. They did not believe that even lowering the price would result in an increase in previously pent-up demand.



One other country has a particularly strong Japanese restaurant sector: Korea, especially Seoul. This sector is one embodiment of the love/hate relationship between Korea and Japan. During the bubble economy, it expanded dramatically, building on both the desire for conspicuous consumption and a thriving expense account trade with both Japanese and Korean business. Prices were generally reckoned by be at least one-third higher than at equivalent Korean restaurants.

Even so, it would not appear that SOK was a familiar product in these restaurants. There is little evidence to show that it was imported directly although anecdotal evidence suggests that small quantities were available through Japanese importers. The Embassy in Korea checked with a number of high end Japanese restaurants and found that the chefs were unfamiliar with SOK. The post also does not believe that it has penetrated the Korean restaurant segment.

Korea has a vibrant seafood trade for both foodservice and home consumption, but high end products have been especially hard hit, perhaps more so even than in Japan. During a visit to Seoul in June 2001, this researcher was asked by Korean importers about availability and pricing of a number of different BC seafood products (though not SOK). In every case, they were looking for prices at least 20% below current levels (even for sockeye salmon which this year hit new landed and wholesale lows). Developing a market for SOK would require low prices and considerable marketing power, fundamentally introducing a new product to a market that is unfamiliar with it. SOK suppliers in BC do not appear to be in a position to do this

One of the maxims of food marketing is that it is 10 times easier to convince someone who already eats your product to buy more of it than it is to bring in new consumers. Nothing in my research suggests that either the domestic market (interpreted as the I-5 corridor) or the Korean market offers opportunity for expansion.

9) Developing the Japanese Market

The SOK situation is not unique, though it may be an extreme case. A number of seafood producers in BC—and elsewhere—with single or limited markets are having to come to terms with the prospect that the high prices they received for their products in the 1980s and early to mid-1990s were unsustainable and often the result of non-product attributes (speculation, currency exchange, etc). In addition to price pressure resulting the sustained weakness in Asian economies, they have to face increased competition in a commodity market from other suppliers and from substitutable products.

Although consumer demand for cheaper food has caused massive “price destruction,” in turn forcing changes in a labyrinthine distributions system and consolidation of buyer power in retail hands, it has proved very difficult for foreign seafood or food suppliers to bypass the traditional system. Importers and trading houses have had a hard time maintaining the role of a middleman more powerful than either the supplier or the end user. Liberalization of the economy after 1990 encouraged an aggressive new group of Japanese importers who brought competitively priced goods to the market, often



undercutting both price and service in the process. With a broader choice of goods and a growing choice of importers, Japanese retailers were increasingly able to bargain for lower prices and better quality. As the downturn in the economy began to affect profits, retailers began spreading their risk by demanding that suppliers carry the financial costs as long as possible. Importers responded by reducing their inventory. Exporters ended up paying the cost.

In Japan, this reluctance to take on risk has resulted in a reduction in the number of buyers. It has also required importers and trading houses to take on new roles, expediting access and distribution. So a group of seafood producers, with none of the corporate control that, say, Clearwater has over hokkigai (another product with limited production largely dependent on a single market) is unlikely to be able to set up a new distribution system to sell direct. This means that if SOK producers want to participate in new market development they need partners in Japan, either existing users or new ones, developing a process of vertical co-ordination where producer, processor and end-user co-operate to expand the market. Such a process does not mean a return to days of import prices of over 4,000 yen/kg, but it does reduce the risk that BC suppliers will be expected to take on all the risk in SOK transactions.

10) Understanding the Japanese Distribution System

One of the constant criticisms of Canadian seafood exporters by the Japanese trade is that they don't spend the time understanding the Japanese market and figuring out how to adapt to change. While some Canadians interpret this as a coded criticism for their reluctance to simply lower prices, it's hard to see how a better understanding of how the market works can be a disadvantage. As one Japanese importer put it, talking of Canadian seafood exporters in general, "if you want to go on selling to us, you have to reduce your costs, improve quality and "freshness," work with us to develop new products and figure out the stories that will sell consumers on those products." A tall order, but not an impossible one—it really boils down to the difference between marketing a product and just selling it.

SOK producers interested in the partnership/vertical co-operation model need to build individual and collective relationships over time with both existing and users and potential new ones. Vertical co-ordination or value-chain development really means that each person/company who touches the product sells more of it as a result of personal connections, product knowledge and buyer-seller familiarity.

The early stages of this process should involve exploring how other food exporters have dealt with similar challenges. This researcher believes that SOK producers have the opportunity to play a more effective role in the changing SOK market than they have before. When pre-made, frozen bento boxes from California (using foreign rice, no less) can sell competitively in Japan, then the market is wide-open to new ideas and new ways of doing business.



The BC Salmon Marketing Council is proposing to bring Nakodo Consulting to Vancouver in November for a half-day session on opportunities in the Japanese value-added food business. Attendance should be mandatory for SOK producers, processors and DFO.

Seabridge has worked closely with both Nakodo to make sure that participants get the opportunity to look both at the broad trends in this market and at specific examples of successful food exporters who have:

- Developed non-competitive sales distribution networks that complement their existing networks;
- Established and developed brands
- Established effective joint marketing and promotional programs with Japanese users to extend market reach, awareness and budgets
- Successfully expanded to regions outside the Kanto and the Kansei
- Successfully expanded into non-traditional markets, developing new sales and distribution routes.

SOK and other BC seafood producers interested in ways to develop new markets without necessarily alienating existing customers (a necessity if production expands) need to look at lessons to be learnt from others in the food business. The following scenarios all have some relevance to SOK and all have been successfully exploited by other food exporters

- Less than adequate market volume (exporter needs more volume, Japanese importers are restricting sales to keep margins up)
- Current distributor seems unable to bring new orders or increase volumes (exporter needs new sales routes)
- Product demand is rising, new competitors about to enter market (new exporters do not understand the market and have no strong relationships so drive the market price down)
- Product quantity is increasing but is sold generically with little or no quality control (new exporters are unfamiliar with market quality requirements and sell average or below average product driving down prices across the board)
- Product sales quantity is steady, new product enters the market (excess, unmanaged supply drives down prices)
- Product has little value-added component (exporters are selling a commodity, Japanese importers have to add value at exorbitant labour rates in Japan)
- Market consumption is low (exporters have more product to sell but importers seem unable to expand market)
- Buyers are all in one or two cities and are part of large seafood companies or trading house networks (exporters are not really exporting but just selling to the W. Coast offices of Japanese importers who do all import/export work for them)
- Product is sold only in one or two niches such as sushi shops (need to develop non-traditional food service campaigns)
- Product all comes ready for sale to the market at once (need to develop sophisticated market extension techniques)



A detailed consideration of how other food exporters have reacted to similar challenges would help BC SOK producers decide whether to explore partnerships and vertical coordination arrangements, with all the attendant risk and benefits, or simply passively await market developments.

11) Quality

Quality is a marketing issue that BC suppliers must face. In Japan it is not a simple concept.

Every seafood exporter knows that quality in Japan is an ambiguous concept. On the one hand, Japanese buyers are the most knowledgeable in the world, and it is their job to define quality and to guarantee it down the line to the end consumer. On the other hand, concerns about quality are often market codes, a reason to pay less for a particular product when market circumstances have changed.

With SOK, the concept is even more confused. For instance, “thick” kelp from closed ponds is generally considered to be top quality whereas thinner kelp often but not necessarily from open ponds is lesser quality. As markets change, however, quality in the traditional sense and demand do not necessarily coincide. In 2001, for example, the highest prices were paid for thin kelp.

If we accept that the opportunities for SOK lie in developing everyday uses and consumers at lower prices, then the perceived quality of BC SOK can be an advantage, displacing cheaper product from elsewhere. A somewhat similar parallel exists with herring roe where the better quality, “crunchier” Pacific roe has to some degree displaced cheaper Atlantic roe in the everyday *ajitsuke* (flavoured roe) market. At a different level, there appear to be genuine concerns about quality. One of the largest users has expressed concern that the quality of open-ponded SOK from BC has deteriorated. This company cites rotten kelp and lack of firmness in the kelp leading to poor recovery rates (up to 20% defective). Another key concern is oxidization (discolouration), which is estimated to affect 10-20% of BC SOK.

Commodity producers cannot hope to break out of the boom/bust cycle without some form of quality/grading standards. Such standards are the foundation of any effective marketing program, both generic and branded. These standards must be market rather than producer-driven and capable of independent verification.

The need for uniform, effective grade standards is one of the common themes in the Japanese SOK trade as most importers currently re-grade all their purchases. BC SOK producers have a chance to solidify their market position in comparison to their competitors by moving quickly to work with Japanese importers to implement grade standards. Those that go first get to set the rules.



12) Branding

SOK is an export commodity with no distinction made by country of origin or other identifying attribute. Within Japan, it has also been relatively undifferentiated although the market ascendancy of Taniya is changing that.

There are some opportunities for branding BC SOK—it's never been done before but BC does have some specific product attributes which combined with a grade standards program could lend themselves to branding. Together, a branding program for the trade would be relatively inexpensive and could help BC position itself well.

Beyond that, the extent of any branding program will depend on the degree of cooperation afforded by existing Japanese partners and/or on the ability to access new buyers and distribution channels. With the exception of sockeye salmon, Canadian seafood products are not generally identified by country of origin, whether they are low end (Atlantic herring roe and capelin) or high end (Gulf snow crab). Indeed, both Atlantic and Pacific herring roe are generally sold as product of Hokkaido. The main users may be unwilling to extend a BC origin brand beyond the trade, seeing it as jeopardizing both their own ability to source from different countries and their own brand identity. On the other hand, Canada has an excellent image as a producer of top quality, natural food products and other users may see an opportunity to capitalize on consumer recognition of this.

It is clear that many users see a role for the producers in the marketing and promotion of SOK. Willingness to contribute to such a process would result in a better dialogue about how to expand markets and set the stage for the development of more effective partnership/vertical coordination relationships.

Conclusions

- 1) There is little or no prospect of recovery in the near or even mid-term future in either the high end (or even mid-range) sushi market or in the gift market. This does not mean that new products (such as high end seasonal bento-osechi boxes) cannot be developed or that these markets will not continue to be important for SOK. It simply means that they are in no position to absorb additional production—indeed some users would prefer to see a cut in production. The continued weakness of this sector, especially if combined with production increases from any source, will inevitably put downward pressure on all prices.
- 2) There are no obvious market development opportunities outside Japan. Even a market like Korea with some theoretical appeal would not be practical for BC SOK producers.
- 3) There is no magic product or market niche that will restore the good old days when SOK sold for over 4,000 yen/kg. Indeed, not only has the price dropped but the range of price has narrowed substantially.



- 4) Any market expansion for SOK in Japan will be in everyday consumption at everyday prices. The two opportunities are in Japanese fast food (take-out/*kaiten*/bento) and in home consumption. In neither case does there appear to be pent-up demand from consumers who have only held back because of high prices. Exploiting either of these in a way that will benefit BC producers will require new market development—building relationships with existing and possibly new users, the willingness and ability to develop vertical coordination arrangements, and expenditures on product development, marketing and promotion. Given the population of Japan, successful exploitation could require a significant, controlled expansion in production. It is unlikely that BC producers will benefit term unless expansion in production is accompanied by an expansion in the number of buyers.
- 5) The SOK market is fragile, changing rapidly and vulnerable to speculation as well as demand. While many if not all in the SOK trade would welcome an increase in production, they all caution that this must be done in a careful, controlled fashion that does not disrupt the market but instead is calculated to increase market opportunities through increasing the number of buyers. Virtually every buyer of Canadian seafood expresses confusion about the role of DFO and its apparent disregard of the marketplace. As one trader put it, “increased production is OK, no increase in production is OK, but we need to know in advance what’s going happen.” Stability of supply (which does not necessarily mean static supply) is a pre-requisite of any marketing program whether branded or generic. Good seafood marketing programs are built around knowing what you’ve got—both in terms of supply and quality.
- 6) The SOK universe is a small one, making the development of relationships all the more important. While the small numbers of producers and buyers has some advantages, the example of canned salmon shows that it does not protect producers from broad trends in the marketplace (a declining demographic niche, lack of new product development, competition from substitutable cheaper products, consolidation at the retail level). Disruption in a small market universe can be very disruptive indeed.
- 7) BC producers are not sophisticated players in the Japanese market, nor do they represent a single corporate entity. They need to understand more about the way the market and the distribution system works and look at how other producers have surmounted similar challenges. They could undertake a number of marketing activities (country of origin ID, participation in trade shows/solo shows, working with chefs, retail demos, publicity and promo material, PR activity) but they can only do this effectively if three things come to pass. The first requirement is an effective working relationship with DFO to manage supply in tune with market needs, the second is the development of much closer relationships between suppliers and users, including possible new users, and the third is improvements in quality and development of grade standards.



Spawn-on-kelp Market Study

Part Two

Potential for, and Impacts of, Expanding Spawn-on-Kelp Production in British Columbia

Edwin Blewett & Associates Inc



The area with the biggest potential to increase production, outside of BC, is Alaska. Most of the landings in the Alaskan herring roe fishery are frozen in the round and exported to Japan and China for processing into brined roe for Japan. The prices received by herring roe harvesters in Alaska are significantly below what could be obtained if they transferred their quota to spawn-on-kelp. Alaskan fishery regulators support such a shift but some herring permit holders have to date been reluctant to support a conversion initiative.

US production out of Alaska and San Francisco are dealt with in more detail in the next section.

Main Areas of Competition with BC

The major competition for BC spawn-on-kelp product derives from production from United States fisheries in San Francisco and Alaska. Other production, as periodically arises in limited quantities from countries including Norway, Finland, Sweden, China, or South Korea, is not deemed to comprise a substantial or definable threat to the BC industry.

Spawn-on-kelp production from Russia has penetrated Japanese markets to a limited extent. Russia's potential to expand spawn-on-kelp production is significant, though impossible to systematically evaluate. Russian spawn-on-kelp production may be considered a "wild card" that could affect overall supply in the long term, but is not foreseen to have a short term impact.

Information in this section therefore focuses on US spawn-on-kelp fisheries in the key production areas of San Francisco and Southeast Alaska.

San Francisco

Both roe herring and spawn-on-kelp are harvested in annual herring fisheries in San Francisco bay. The San Francisco spawn-on-kelp fishery consists of 11 permit holders (maximum number fixed by regulation), though fewer may participate in a given year, if expected economics are poor. The number of permit holders is kept small to prevent undue congestion in San Francisco bay and in recognition of the limited number of suitable sites for securing rafts in the bay. All licencees utilise open pond operations. Giant kelp (*Macrocystis*) is not found in San Francisco bay so it is brought in from other coastal locations. Quotas are based on prior season biomass; stocks are currently at modest, though healthy levels. Spawn-on-kelp produced in San Francisco fits into the lower end of the quality spectrum (ie, lighter density, slight silt content). Variables affecting production levels include: herring biomass forecast (influences quota); herring abundance; availability of kelp (winter storms may limit supply); location of spawn (may be other than at sites where rafts are anchored); and number of permits engaged.



Table 5: San Francisco Spawn-on-Kelp Production

Historical data on spawn-on-kelp production out of San Francisco are presented in Table 5. Currently, a low biomass level is leading to reasonably small quotas. Quotas will rise if and as biomass improves. Future landings may be expected to follow a similar, volatile, pattern as in the past.

Alaska

Alaskan spawn-on-kelp production historically derived from Norton Sound and Prince William Sound. The Prince

William Sound fishery has been closed since the Exxon Valdez oil spill in 1989. Since the closure of Prince William Sound, the spawn-on-kelp fishery has developed in Southeast Alaska, particularly Hoonah Sound.

Three fisheries currently comprise the Alaskan spawn-on-kelp fishery: Hoonah Sound, and Craig (in SE Alaska) and Norton Sound (in the Arctic region), with Hoonah Sound being the predominant, and most consistent, contributor.

Hoonah Sound

Table 6: Hoonah Sound Spawn-on-Kelp Production

| Year | Harvest (tons) | Kelp Blades Per Pond | Ex Vessel Value (\$US) |
|------|-------------------|-------------------------|---------------------------|
| 1990 | 11.9 | 240 | 8.46 |
| 1991 | 13.25 | 280 | 7.31 |
| 1992 | 23.12 | 240 | 9.8 |
| 1993 | 14 | 160 | 19.36 |
| 1994 | 32.7 | 140 | 25.74 |
| 1995 | 27.4 | 100 | 21.45 |
| 1996 | 0 | 0 | 0 |
| 1997 | 65.2 | 430 | 7.05 |
| 1998 | 85.9 | 400 | 6.75 |
| 1999 | 71.6 | 400 | 7.02 |
| 2000 | 32.7 | 110 | 8.23 |



| | | | |
|------|------|-----|------|
| 2001 | 65.9 | n/a | 7.61 |
|------|------|-----|------|

The Hoonah Sound spawn-on-kelp fishery started in 1990. It is a limited entry fishery with a maximum of 107 participants. The bulk of its production comes from closed ponds. Hoonah Sound operators produce thick density, "jumbo" product, comparable to BC (though of a marginally lower quality). Fishery production is influenced by the pre-season estimate of herring returns. A kelp allocation per operation (number of fronds per pond) is determined based on expected herring abundance (ie, larger herring forecasts lead to more generous kelp allowances). Hoonah Sound herring stocks are rebounding from low recent levels—the fishery was closed in 1996 due to low biomass forecast. The expectation for 2002 is for more-generous biomass estimate and kelp allowance. Production could double in 2002 from 2001 level; if that occurred, it would be the largest harvest ever in Hoonah Sound.

Craig

Table 7: Craig Spawn-on-Kelp Production

| Year | Production (tons) |
|------|-------------------|
| 1990 | 0.1 |
| 1991 | 0.05 |
| 1992 | 25.7 |
| 1993 | 5.7 |
| 1994 | 16.5 |
| 1995 | 27.0 |
| 1996 | 37.3 |
| 1997 | 22.8 |
| 1998 | 22.5 |
| 1999 | 36.4 |

A fishery taking place in Craig, Alaska also contributes limited spawn-on-kelp production, though on a smaller scale than the Hoonah Sound fishery.

Production is identified in Table 7.

Sitka

An experimental open pond spawn-on-kelp test fishery was conducted in Sitka for a two year period (1998-1999). The fishery was exploratory, to examine whether commercially acceptable product could be produced using open pond techniques, with the potential objective of converting roe herring seine licences to spawn-on-kelp permits. The fishery produced 50 tons in two years, with quality and prices commensurate with a "learning curve" operation. While the trial was considered successful, the decision was made *not* to proceed with a full-blown spawn-on-kelp fishery in Sitka.

Political, not economic or resource, issues scuttled the establishment of a spawn-on-kelp fishery in Sitka. Participants felt that pro-



duction could be substantial and that open pond product could be absorbed by the Japanese market, but that new volumes could negatively impact prices received by closed pond operations in SE Alaska.

A re-examination at this herring-use decision could substantially increase Alaskan spawn-on-kelp production in the future.

Norton Sound

Table 8: Norton Sound Spawn-on-Kelp Production

This sporadic fishery taking place in the Arctic region near Nome, Alaska contributes minor spawn-on-kelp production. Production for the last 4 years is summarised in Table 8. Recent volumes are small and have been shrinking.

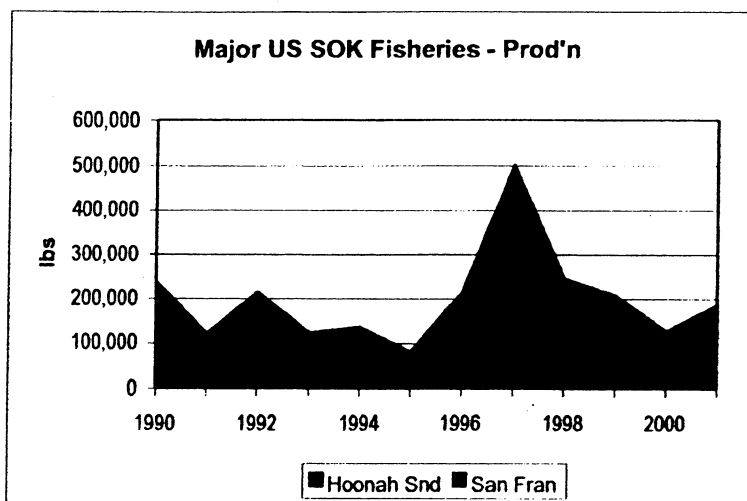
| Year | Production (tons) |
|------|-------------------|
| 1998 | 9.04 |
| 1999 | 3.74 |
| 2000 | 2.25 |
| 2001 | 2.20 |

Summary/Outlook

The main fisheries that contribute significant volumes that may materially impact North American supply of spawn-on-kelp are San Francisco and Hoonah Sound (SE Alaska).

Spawn-on-kelp production from these two fisheries for the last 10 years is shown in Figure 3.

Figure 3: Spawn-on-Kelp Production from San Francisco and Hoonah sound



The Hoonah Sound fishery is relatively new, and on a growth trend, with 2002 production likely to increase substantially above 2001 level. As a closed-pond fishery with reasonable proximity to BC, the Hoonah Sound fishery targets similar market segments as BC product, though at marginally lower prices.



San Francisco volume is inherently volatile. The recent downward trend may hold for a few years, but could very quickly turn around (see Table 5: 94/95 production = 13.1 tons; 95/96 production = 106.8 tons).

While US spawn-on-kelp production in the last three years has been quite low, over the long haul, it can be expected to be higher. Periodic spikes in production should be considered likely. Other fisheries (eg, Craig, Norton Sound) may kick-in sporadically.

There is one wildcard. If the Sitka decision *not* to allow conversion of scine permits to open-pond spawn-on-kelp is reversed, there could be a major increase in supply from southeast Alaska.

ELDERWOOD TRADING CO., LTD.

276 Newport Drive, Port Moody, B.C., Canada V3H 5C9

Tel: (604) 461-4555, Fax: (604) 461-4542



PC308
73 of 78

TO WHOM IT MAY CONCERN

Subject: Sitka Sound Roe Herring Open Pound Fishery

I have been invited to provide testimony on the subject of SOK production in Sitka Sound. I would consider it a privilege. It is my sincere hope that the views expressed here may promote healthy discussion and perhaps, lead to the adaptation of policies which will benefit all in the industry.

I have been involved with SOK for the past 20 years. During those 20 years, my company has gained valuable knowledge and experience into the workings of the SOK market. In 1999, we purchased 260 tons of SOK from California, B.C., and southeast Alaska, including Sitka.

It is my understanding that if the full potential of roe herring is utilized, Sitka may one day become the leading SOK-producing region of the world. I have heard concerns expressed that such increase in supply would disturb the delicate balance of supply-and-demand and produce a negative impact on the already fragile market, and bring hardship to the existing permit holders of SOK. These are legitimate concerns and one must not take them lightly.

However, I am of the opinion that, reducing the supply to keep the price up can work only under certain market conditions - but not now. In the present market climate, it will only mean repeating the same mistake that already has led the SOK industry to its current predicament.

To explain further, first let us examine the reasons for the current downturn in the SOK market. In my opinion, the present difficulty is in large part due to reaction to excessively high prices of the past.



To elaborate on this point, I have attached two graphs following.

The dollar values used are the mean average prices for closed pound SOK from B.C. They show a dramatic price increase that peaked in 1995, only to be followed by an equally precipitous price drop, which continued unabated to 1999. The expression, "Where the mountain is high, the valley is deep", encapsulates the essential behavior of the SOK market.

Graph 1 shows the combined supply of SOK from all the North American production areas. Here the rising prices up to 1995 seem to correspond with decreasing supply. In the same token the declining price curve from 1996 coincides with increasing supply for that period. Here, a superficial examiner of this graph may jump to a hasty conclusion that this is the evidence of increased supply driving down the prices. However, he must be cautioned not to be so hasty.

Graph 2 shows same price curves. However, it is different from Graph 1 in that it shows only the closed pound production from B.C. and southeast Alaska. Here the supply of thick product was fairly consistent through the same period of great price upheaval. Granted, there was a sizable supply increase in 1997. However, during the years that followed the declining price curve continued despite supply reached a plateau. It is reasonable to conclude, then, that it was not the over-supply that affected the price of SOK, but some other factors were at work.

The single most important factor that has been driving the price down, in my opinion, is the economic recession in Japan. During the bubble economy years that lasted until early 1990's, Japanese consumers displayed great appetite for luxury. Consumption of expensive foods, including SOK, rose to record levels, and as those commodities became objects of speculation, the prices soared. But as the bubble burst, realities of economic recession set in, and the consumers backed off.

Take for example the kazunoko (herring roe) market. Despite the fact that the 1999 supply of kazunoko was the lowest in twenty years at less than 10,000 tons, the year-end gift kazunoko market plummeted. Conversely, lower-priced kazunoko in the form of consumer pack fared relatively well. Total consumption appeared to have been at par with supply.



The same situation manifested itself with SOK. Movement of thick SOK (jumbo & No.1 from B.C. and Alaska) was extremely sluggish, and the prices were down to record low levels. Thinner product, on the other hand, sold well, because prices were low enough to appeal to consumers.

These examples show that the market is constantly evolving, and that how important it is to stay in tune with the consumers' needs.

There are four main ingredients to successful marketing. They are:

- Healthy demand
- Consistent supply
- Reasonable price
- High quality

Of these, a healthy demand has to be ranked as the highest importance. If the high prices of recent years have alienated the consumers away, what the SOK industry must accomplish now is to find way to recapture the lost customers and generate new demand. Aside from making the product more appealing in terms of both price and presentation, the key is to make SOK accessible to a greater number of consumers. The task of generating demand is not a difficult as it may seem. For SOK possesses inherently superior product appeal. For instance, nine of ten people who actually tasted SOK will show a decided preference for SOK over kazunoko. This is an evidence enough that there is a huge potential for an untapped consumer market for SOK.

However, the size of the market can only be as big or small as the volume of supply. In this sense, the very limited supply that gave SOK the exclusivity in niche market is a fundamental weakness that prevent it from acquiring wide popularity. This point is clearer when one compares the supply of SOK against herring roe. In 1999, the total supply of herring roe was 10,000 tons, while SOK was just over 500 tons, barely 1/20th of kazunoko. This means that only a very few consumers had ever tasted SOK. Indeed, the majority of Japanese are even aware of its existence. The solution, then, seems to be to increase supply, while maintaining reasonable price and quality.



To this end, proposed alternative harvesting in the form on SOK in Sitka can make a significant contribution, especially if the open pound method is used. In the market where thick product by closed pounds dominates, thinner product by open pound will provide just enough diversity. It is possible that, instead of competing, producers of open pound and closed pound SOK can complement each other. By having the ability to offer rich variety of product, the SOK industry collectively will enjoy a greater chance of success in the task of opening wider market, and cultivating the greater demand in the process.

In conclusion, I believe that, if managed properly, open pound SOK fishery in Sitka Sound offers a promising alternative for better utilization of available resources. Even though critics may have legitimate reasons to worry about the over supply, benefits far outweigh the detriments. Perhaps, in consideration to existing permit holders the initial quotas should be set at a moderate level, but with mechanism to increase gradually as more demand is generated.

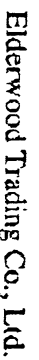
Thank you for the opportunity to voice my opinion. It is my sincere hope that the new management plan for SOK in Sitka Sound will be formulated with the greatest care for the future benefit of all.

Respectfully yours,

Ed Furumori

NORTH AMERICAN SPAWN ON KELP PRODUCTION

| PRICE RANGE for B.C. PRODUCT | | | | |
|------------------------------|---------|-----------|---------|---------|
| C&LB | | | | |
| Low | | Mid range | | High |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| \$10.65 | \$15.00 | \$16.00 | \$17.00 | \$22.15 |
| \$14.00 | \$20.00 | \$21.00 | \$23.00 | \$32.80 |
| \$22.50 | \$26.00 | \$28.50 | \$32.00 | \$36.25 |
| \$36.00 | \$40.00 | \$41.00 | \$42.00 | \$46.00 |
| \$25.00 | \$28.00 | \$28.50 | \$29.00 | \$30.25 |
| \$17.00 | \$21.00 | \$22.00 | \$23.00 | \$26.50 |
| \$6.00 | \$12.00 | \$13.50 | \$15.00 | \$18.00 |
| \$8.63 | \$10.00 | \$12.50 | \$13.50 | \$14.00 |
| | | | | |





Graph 2 - CLOSED POUND PRODUCT

NORTH AMERICAN SPAWN ON KELP PRODUCTION

CLOSED POUND (THICK PRODUCT)

Unit: STon

| Year | B.C. | Hoonah | Craig | TOTAL |
|------|------|--------|-------|-------|
| 1985 | 208 | | | 208 |
| 1986 | 157 | | | 157 |
| 1987 | 213 | | | 213 |
| 1988 | 234 | | | 234 |
| 1989 | 235 | | | 235 |
| 1990 | 247 | 12 | | 259 |
| 1991 | 311 | 13 | | 324 |
| 1992 | 308 | 23 | 26 | 357 |
| 1993 | 302 | 14 | 6 | 322 |
| 1994 | 289 | 33 | 17 | 339 |
| 1995 | 282 | 29 | 25 | 336 |
| 1996 | 294 | 0 | 37 | 331 |
| 1997 | 347 | 65 | 23 | 435 |
| 1998 | 357 | 86 | 22 | 465 |
| 1999 | 360 | 65 | 35 | 460 |
| 2000 | 367 | 75 | 20 | 462 |

EWT est

PRICE RANGE for B.C. PRODUCT

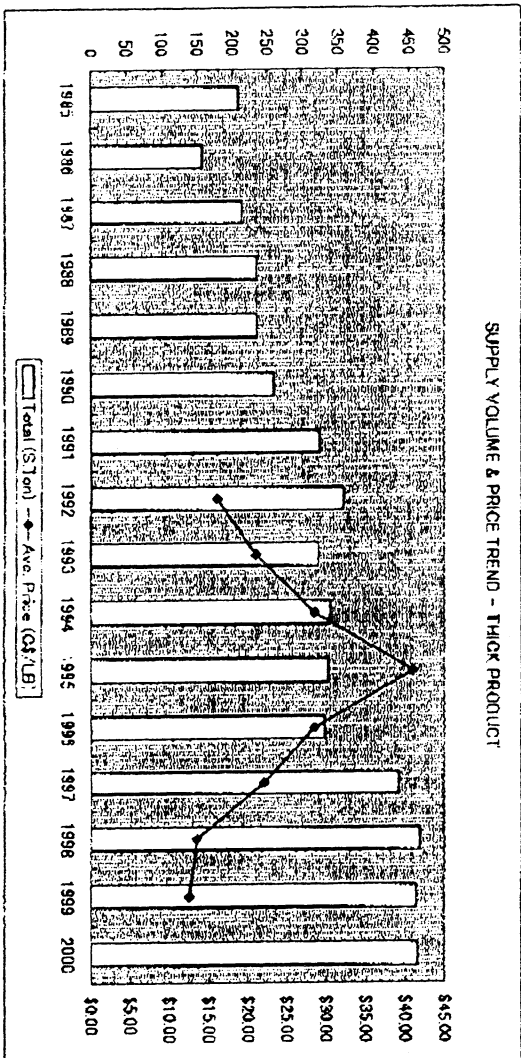
CSLB

| Low | Mid range | High |
|---------|-----------------|-----------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| \$10.65 | \$15.00 \$16.00 | \$17.00 \$22.15 |
| \$14.00 | \$20.00 \$21.00 | \$23.00 \$32.80 |
| \$22.50 | \$26.00 \$28.50 | \$32.00 \$36.25 |
| \$35.00 | \$40.00 \$41.00 | \$42.00 \$46.00 |
| \$25.00 | \$28.00 \$28.50 | \$29.00 \$30.25 |
| \$17.00 | \$21.00 \$22.00 | \$23.00 \$26.50 |
| \$6.00 | \$12.00 \$13.50 | \$15.00 \$18.00 |
| \$4.63 | \$10.00 \$12.50 | \$13.50 \$14.00 |
| | ? | |

OPEN POUND (THIN PRODUCT)

| Year | SF | PWS | Norton | Sitka | TOTAL |
|------|-----|-----|--------|-------|-------|
| 1985 | | 71 | | | 71 |
| 1986 | | 120 | | | 120 |
| 1987 | | 200 | | | 200 |
| 1988 | 20 | 221 | | | 241 |
| 1989 | 47 | 0 | | | 47 |
| 1990 | 107 | 219 | | | 326 |
| 1991 | 47 | 310 | | | 357 |
| 1992 | 84 | 495 | | | 579 |
| 1993 | 47 | 269 | | | 316 |
| 1994 | 35 | 0 | | | 35 |
| 1995 | 13 | 0 | | | 13 |
| 1996 | 107 | 0 | | | 107 |
| 1997 | 186 | 34 | | | 220 |
| 1998 | 36 | 12 | 8 | 27 | 83 |
| 1999 | 35 | 0 | | 22 | 57 |
| 2000 | 90 | 0 | | 50 | 140 |

SUPPLY VOLUME & PRICE TREND - THICK PRODUCT



TOTAL P.07

Elderwood Trading Co., Ltd.

01/13/2000

Submitted By
Ryan kelly
Submitted On
12/17/2021 5:06:42 PM
Affiliation

Phone
9073050086
Email
fvmojo@gmail.com
Address
po box 442
Asotin, Washington 99402

I strongly oppose proposal 103



Submitted By
Ryan kelly
Submitted On
12/17/2021 5:03:23 PM
Affiliation

Phone
9073050086
Email
fvmojo@gmail.com
Address
po box 442
Asotin, Washington 99402

I strongly support proposal 82



Submitted By
Ryan Kelly
Submitted On
12/17/2021 5:01:54 PM
Affiliation

Phone
9073050068

Email
rylor@hotmail.com

Address
410 1/2 Harding Street
ASOTIN, Washington 99402

I strongly support proposal 144



Submitted By
Ryan kelly
Submitted On
12/17/2021 5:00:11 PM
Affiliation

Phone
9073050068
Email
rylor@hotmail.com
Address
410 1/2 Harding Street
ASOTIN, Washington 99402

I strongly oppose proposition 83!





From: [Sam Dalin](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: King salmon limits
Date: Wednesday, December 22, 2021 1:01:52 PM

[You don't often get email from samdalin@yahoo.com. Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Marit Carlson Van Dort, Chairman
Alaska Board of Fisheries
1255 W 8th St
Juneau AK 99811

Regarding King Salmon proposal 82&83

My name is Sam Dalin I own and operate Dalin Charters and Guiding based out of Ketchikan and have been operating for 20 plus years. Sportfishing is one of my primary sources of income (I also am a commercial fisherman and hold a power troll permit and generate income with it also so I can see some from both sides) and not only help support my family but bring a large amount of income into the local economy through myself and guest that use my services in the way of supporting local businesses from tackle, grocery stores, local hotels, airlines, gift shops, gas stations, mechanics, and many others!

King Salmon are a essential part of my business especially early season and are one of the main species that drive these potential guest to come visit our state!

Having in season regulation changes or closures or annual limits that are to restricted will, has been, and will continue to be a major deterrent for these people wanting to come experience SE Alaska and contribute to the local and state economy.

I'm not in support of proposal 82. Im concerned about the ability for non resident to keep kings in low abundance years under 82, it also has the abilities to manage non res in season, never giving them the opportunity to know what regulations will be in effect prior to arrival thus detouring fishermen that would otherwise come support our economy like a stable set limit would at all abundance levels.

I support proposal 83 that keeps workable regulations in low abundance and avoids in season management. It would be beneficial for visiting guest to have similar regulations each season rather than liberalize limits in high abundance years and in season management or closure. It's hard to market and keep guest coming to our businesses and communities without stable regulations.

The proposed cuts to sport regulations in 82 seem harsh from what sport fishermen have been traditionally allowed. It seems important to keep residents open while also allowing enough opportunity for non residents to keep king salmon and wanting to continue traveling to SE Alaska.

I believe proposal 83 does better for both these groups.

Thanks,
Sam Dalin
Dalin Charters & Guiding
7937 Williams RD
Ketchikan AK 99901
907-225-8336



From: [Sam Dalin](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Proposal 115/Board Members
Date: Wednesday, December 22, 2021 1:28:43 PM

To the concerned Board Members

My name is Sam Dalin and as a Alaska power troller I'm writing in favor of proposal 115 moving the start date of the winter troll fishery forward to align with SW 41

Thanks Sam Dalin

Ketchikan Alaska

[Sent from Yahoo Mail for iPhone](#)

Submitted By
Sarah Rasmussen
Submitted On
12/22/2021 2:29:33 PM
Affiliation



PC311
1 of 1

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to subsistence roe-on-branch harvest. We need to protect the herring for generations to come and respect the traditional knowledge and stewardship of the Tlingit people.

Submitted By
Sarah B Stewart
Submitted On
12/16/2021 1:52:44 PM
Affiliation



PC312
1 of 1

Phone
6178766735
Email
sarahbstewart@yahoo.com
Address
85 Garfield Street
Watertown, Massachusetts 02472

We are writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

There used to be bountiful spawning herring populations throughout Southeast. But in the last 50 years, spawning grounds from Kah Shakes to Lynn Canal have collapsed under ADF&G management ... and not a single one has yet recovered. Herring are a keystone forage fish species and critical food for salmon, as well as other economically and culturally important species like humpback whales and harbor seals.

While the proposals being considered by BoF next month are not enough to undo the collapsed herring populations across Southeast, they are an important first step in protecting Sitka Sound's population — the last best herring spawning grounds in the region.

Therefore we are writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.



12/20/2021

W. Scott McKelvey
P.O. Box 6440
Ketchikan, AK
99901

Alaska State Board of Fish Committee Members:

By way of introduction, my name is Scott McKelvey. I am the Director of Operations for the Waterfall Resort ("Waterfall") and Steamboat Bay Fishing Club ("SBFC"), both of which are located in Area 2C in Southeast Alaska. The purpose of this letter is to relay our support of proposal #83, or proposal #82 with amendments. Both Waterfall and SBFC have operated charter fishing operations for many years; Waterfall has been in business for 39 years and Steamboat Bay Fishing Club has been operating for 7 years. Throughout this time, we have had an opportunity to build an extensive clientele list which includes non-residents and Alaskans alike. Our resorts have hosted an estimated 20,000 guests over the past 39 years, guests that have brought revenues into both the State and local economies through fishing license purchases, hotel taxes, airport taxes, purchases in local merchant stores, etc..

Over the past few seasons, there has been a sudden closure of King Salmon licenses which has cost us tremendously with our guests, despite our best efforts to provide updated information to our guests on a weekly basis. These sudden closures have had an adverse effect on our guests and have led them to question whether or not they wish to return to Alaska for fishing. In terms of fiscal impact, these sudden closures will certainly lead to us shortening the fishing season which will result in fewer employment opportunities, and the loss of significant revenues for both us and our local economy, which has already been devastated by COVID-19.

(page 1 of 3)



The passage of proposal #83 would allow better stability for our fishing enterprise by providing a constant “limit” plan put in place throughout the season for non-resident anglers, with an emphasis on protecting the resident anglers’ limits as well. By providing a platform with constant limits over timeframes, it would help guarantee an opportunity for all anglers to retain at least one King Salmon. The tiered system shown in proposal #83 as 1/3 in June, 1/2 in July, and 1/1 in August for non-residents would help our Marketing and Sales efforts by providing a sense of security that many of our August clients seem to be losing. Speaking on behalf of properties, managers, employees and guests, we place the utmost importance on respecting Alaska’s world-class resources, and the conservation efforts needed to protect it, and we are confident this proposal achieves this goal.

While Proposal #83 is a vastly superior proposal in our opinion, we would also support proposal #82 with amendments. We would like to see the same constant tiered limit structure of 1/3, 1/2, and 1/1 mentioned in proposal #83, with the sport allocation adjusted to a ceiling of 25% throughout all tiers (with any projected underages going to the troll fishery), and limiting in-season management only to non-residents if deemed necessary. Proposal #82 would also need to be amended to allow a shift in allocation for no closures in years of low abundance. Stability in limits is one of the most important factors to keeping businesses across the whole spectrum viable. These possible closures are what we are trying to avoid, as they are detrimental to all of our businesses, with repercussions impacting down the chain to service providers throughout the local economies.

(page 2 of 3)



In summation, we ask you to support proposal #83, or #82 with amendments to help provide a stable limit structure for non-residents with respect to the King Salmon fishery in Southeast Alaska. This is extremely important, in order to allow not just all the charter operations to continue, but also to improve local employment, tax revenues, tourism, and small businesses.

Respectfully,

W. Scott McKelvey
Director of Operations
Waterfall Resort
Steamboat Bay Fishing Club

(page 3 of 3)

Submitted By
Scott Pearce
Submitted On
12/17/2021 10:54:22 AM
Affiliation



PC314
1 of 1

Please listen to the Sitka Elders and to SEACC. Thank you, Scott



Marit Carlson Van Dort, Chairman
Alaska Board of Fisheries
1255 W. 8th Street
Juneau, AK 99811-5526

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

I'm the owner of Alaskan Anglers Inn, LLC and Deep Blue Charters, Inc. We have operated in the community of Gustavus for seven years. We employ 12 people, and buy food, supplies, parts, and fuel from local businesses. Our business is one of the largest payers of taxes to the city of Gustavus. We have 25 to 30 guests every week who come to fish for king salmon, halibut, and silver salmon.

King salmon are critical to our operation, especially through mid July. The last half of the summer, our guests are able to catch silver salmon, which makes the catching of king salmon less critical.

I do not support Proposal 82. It would devastate my business. From June 16th through mid July, very few guests would be interested in fishing at our lodge. Our guests typically come and fish at our lodge for five days. If they were to catch a king salmon on their first day, they would be very disappointed to fish only for halibut the remaining four days. As it is, we are only open 15 weeks out of the year. If we shut down from June 16th through mid July, it makes me wonder if it makes sense for us to stay in business.

I support Proposal 83 that keeps workable regulations in low abundance and avoids in season management. It would be much better for customers to have similar regulations year after year than to liberalize limits in high abundance years and get strict limits or closures in low abundance, or to close the fishery unexpectedly. It's hard to market and keep people traveling to our businesses and communities with unstable regulations.

The proposed cuts to sport regulations in Proposal 82 seem harsh from what sport fisherman have been allowed in past years. It's important to have enough fish for residents to get fish for the freezer, and also to keep enough opportunity for non-residents to catch kings to keep them visiting Southeast Alaska every year. Proposal 83 does a better job for both resident and non-resident fishermen.

I hope the Board can find a fair tradeoff for all groups that fish for king salmon, to keep both resident and non-resident sport fishing open all season, with workable regulations during low runs. It will benefit Alaskans by helping put up food, and also keep people coming to Alaska at levels that are a big boost to the economy.

Sincerely,

A handwritten signature in blue ink that reads "Scott Swenson".

Scott Swenson
Alaskan Anglers Inn, LLC
Deep Blue Charters, Inc.
866-510-2800



December 22, 2021

Alaska Board of Fisheries

Re: King Salmon Management Proposal 82 & 83

Dear Alaska Board of Fisheries Members,

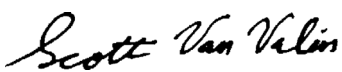
I am a 2nd generation remote lodge owner, born in Alaska, and I have been at an Alaskan fishing lodge every summer of my life (50 years). My parents started a remote fishing lodge in the Bristol Bay region in the late 1960's where I grew up year-round. Their fishing lodge provided 100% of our entire family income during my childhood. I am also a remote fishing lodge owner on Prince of Wales Island (area 2C) and have been so for the past 30 years. Like my parents, I am supporting my Alaskan family from the proceeds of this Alaskan business. The lodge/ charter fishing industry is just as much a way of Alaskan life to my family as other fishery sectors are to others. It how we make a living, it's what my family has done for two generations, and it is vital to our Alaskan way of life.

For the past 35 years we have re-invested every dime we could back into El Capitan Lodge. From its humble beginning when my father and I landed on the shore of Sarkar Cove on Prince of Wales Island, where we built a very rustic lodge designed for six guests per trip, up until today where we have the pleasure of hosting 20 anglers on three day fishing trips totaling 750 guests per season. One thing that is an absolute necessity for El Capitan to continue operating into the future is stable fisheries regulations. We cannot retain customers with in-season closers. Our guests travel thousands of miles to get to Alaska with most booking their trip at least 12 months in advance. Over the past 35 years, we have hosted thousands of mostly out of state anglers. The main deciding factor of guests traveling to Alaska is the opportunity to retain the most desired species up here, the Alaskan King Salmon. Southeast Alaskan King Salmon is a major factor why I am a 2nd generation lodge owner able to support my Alaskan family these many years. Our guests do not require excessive limits during times of high abundance. We market opportunity and without opportunity we have nothing to market. In season shutdowns of King Salmon will destroy our family's future and the Alaskan business we built with blood, sweat, and tears. Anything less than one King a day May through June is zero, zero King Salmon retention means zero opportunity, and zero opportunity means zero guests. Our guests do not require large limits of King Salmon like we saw in July and August of 2020 with non-resident limits of 3 King Salmon per day and 9 King Salmon for the year. Our guest require stabilized opportunity, with out it they will not come to Alaska. It's time to implement King Salmon management that provides stability and opportunity to non-resident charter & lodge guests.

As an Alaskan resident I do feel the residents of Alaska should be of the highest priority when it comes to retention of King Salmon and residents should never be faced with non-retention, however in years of low abundance I feel the resident limit should be adjusted accordingly, but never closed completely.

For the many reasons stated **I do not support Proposal 82 unless it implements the tier progression of bag limits as listed in SEAGO's Proposal 83.** If Proposal 82 does not implement the progression bag limits as listed in Proposal 83 then Proposal 82 will be a death sentence for my business and the entire southeast charter & lodge industry. **I fully support Proposal 83 and respectfully request that the Board implements it.**

Respectfully,


Scott Van Valin



507 Katlian St
Sitka AK 99835
907-747-5811

Dear Madam Chair Märit Carlson-Van Dort and members of the Alaska State Board of Fisheries (BOF):

Thank you for the opportunity to comment. Seafood Producers Cooperative (SPC) submits these comments on proposals submitted to the BOF on SEAK finfish management. Seafood Producers Cooperative was founded in 1944, as Halibut Producers Cooperative (HPC). HPC initially harvested halibut for food, and a byproduct, the liver oil, was utilized as a vitamin supplement for the war effort in World War II. SPC expanded to other seafood products in the 50s, in particular troll salmon and later longline sablefish and albacore tuna. In the 1970s HPC's title converted to SPC. In 1980, SPC built a plant in Sitka, where our processing facility continues to provide services to our fleet and community to this day. SPC has 389 producer members. SPC currently has 106 employees and is one of Sitka's largest private sector employers. SPC markets fish domestically, both direct to consumers through e commerce and to retailers and wholesalers, and internationally. SPC's production is derived primarily from the troll and longline fisheries. SPC will mostly comment on proposals that will impact the Southeast Alaska (SEAK) King Salmon Management Plan (KSMP). SPC will also comment on the Alaska Department of Fish and Game's (ADFG) Action Plan for management of the northern fisheries with respect to the Chinook Stocks of Concern (SOC). SPC's position on these proposals is based on the need to provide for stability in the troll and longline fleets and accountability of all commercial users.

King salmon is a very important component of SPC's production. It is one of the highest margin (often the highest) seafood products that SPC processes. King salmon has been a primary target species of the troll fishery since trolling was established as a fishery in the late 19th century. Since the Pacific



Salmon Treaty (PST) was established in 1985, SPC and the troll fleet have seen access to king salmon steadily reduced. This has been especially true in the 2008 and 2018 Treaty renegotiations. The harvest opportunity for trollers and all those that fish for king salmon in SEAK has been diminished. During the three and a half decades since the PST has been implemented, trollers have worked with these restrictions and ADFG and the Regional Hatchery Associations to find opportunity to harvest king salmon where it is possible. Trollers have funded hatchery production of king salmon with the 3% enhancement tax. *All user groups, including the recreational users, resident and nonresident benefit from the troll funding of the regional hatcheries.* Trollers have crafted boundary modifications for king salmon hatchery access in the spring openers by working with ADFG, the BOF and Regional Hatchery Associations. Since 2018 troll access to the hatchery produced kings has been substantially curtailed due to time and area closures that start in mid-March, to protect the Alaska SOC. Since these restrictions have been implemented and the harvest opportunity reduced, the troll fishery has not asked for other groups that derive their incomes from harvesting king salmon to give them more fish.

Before we speak to specific proposals, there are other issues that the BOF should consider. The renegotiation of the PST in 2018, that implemented large cuts at all tiers of abundance and capped the top tier at a substantially lower level than prior Treaty agreements, was arrived at by negotiations that included stake holder members from all user groups in Alaska through the Northern Panel. All user groups were aware of the potential impacts of the new PST regulations on their respective fisheries and industries. It is up to each user group to live with in those boundaries. This is especially true if the user group is an industry that is making money off the harvest of king salmon. It is also the Alaska Department of Fish and Game's (ADFG) responsibility to see that this is done.

Another important issue for the BOF to consider is that Alaska is currently participating in a lawsuit in the UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE, Washington Fish Conservancy v Barry Thom et al National Marine Fisheries Service (NMFS), the Alaska Trollers Association (ATA) and State of Alaska. This lawsuit pertains to the alleged interception of Chinook salmon that have been determined to be the primary food source of the Southern Resident Killer Whales (SRKW). The SRKW reside in the Puget Sound area and feed primarily on Chinook stocks that do not migrate north to Alaska in significant numbers. However, the Court has chosen not to acknowledge that fact and



further restrictions on the SEAK Chinook fisheries are under consideration. It is entirely likely that harvest opportunities for Chinook could be further curtailed. Therefore, it is not appropriate to make large changes to the SEAK King Salmon Management Plan at this point.

Proposal 80: SPC supports the idea of Proposal 80 submitted by ADFG providing with the caveat that SPC wants individual gear groups within the King Salmon Management Plan to be accountable for their own overages.

Proposal 81: SPC supports this proposal but would like to note that there is already a similar mop up regulation in effect. Also, given the growth in the guided and unguided recreational harvest by nonresidents, this situation is not likely to occur very often in the future unless something catastrophic occurs to the national economy or another pandemic or this pandemic flares up as happened in 2020.

Proposal 82: SPC supports the ADF&G proposal 82 with the two amendments suggested by the Sitka Advisory Committee that protect access for resident sport anglers. Specifically, to apply resident priority as a management objective at all levels of abundance:

~~5 AAC 47.055 (b)(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.~~

And to delete the proposed July 1-July 31 resident closure that would apply to years when the CPUE is 2.6-3.8:

~~5 AAC 47.055 (g)(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;~~

Under this proposal, we support a plan where sport bag limits will be set by the Commissioner at the beginning of the season based on that year's sport



allocation adjusted for any prior underage/overage. So long as the in-season harvest projection doesn't vary too far from the target, no in-season management would be necessary. Similar to the original 1992 King Salmon Management Plan, any underage or overage needs to be accounted for by adjusting the following year's sport allocation. In-season management would only be necessary if in-season harvest rates project that the original bag limits are likely to result in a harvest that deviates too far from the target, say by more than 1.5% of the combined troll-sport allocation.

Proposal 83: SPC strongly opposes this proposal. The mechanics of this proposal are flawed. Without limited entry for the guided sport sector and nonguided sport sector the 80% troll/20% sport will never be achieved without flexible bag/annual limits. The number of vessels and lodges that are harvesting Chinook and other fish species is increasing. The king salmon quotas that will be available are significantly lower than they were in the early 1990s, when the referenced previous method of management in this proposal was in place. The tourist based recreational harvest season is about 2 months longer than it was in the 1990s. At the time of the former management regime, most of the guides and lodges were booking clients primarily from Memorial Day to Labor Day. Now the majority of the fleet is active from early May to mid-September. Also, there were very few unguided boat operations in the 1990s. Now there are many, and the number is growing. The idea that an 80/20 allocation average can be achieved under this suggested regime is not realistic. The authors of this proposal had members of their organization sitting on the Northern Panel as a stake holder representatives for the recreational sector. They are well aware that the latest PST agreement requires that all groups make do with fewer king salmon. The only way an allowance for sport overage on a given year could work is with a rigorously defined payback policy that is not dependent on the yearly AI. The assumption that there will be an equal amount of high abundance years versus low abundance years in the future fails to acknowledge changing ocean conditions and climate change.

Proposal 88: SPC opposes this proposal for similar reasons to Proposal 83. Both proposals would lead to unjustified reallocation of king salmon.

Proposals 101 and 103: SPC opposes these two proposals that request an extra management layer be added to the production of hatchery fish. Proposal 101 speaks specifically to the Northern Southeast Aquaculture Association (NSRAA) Crawfish Inlet fisheries. Both proposals ignore the current involvement ADF&G has in the permitting, location, and management



of the hatchery access fisheries in the Terminal and Special Harvest areas through the Regional Planning Team (RPT). ADF&G, along with hatchery management are all represented at these meetings. No evidence is presented of the straying issue that is mentioned. SPC fully supports the hatchery programs as an important part of all SEAK fisheries as they provide opportunity for SPC members in all gear groups to harvest salmon, especially if SE wild Chinook or other stocks are to be avoided in certain situations.

Proposal 144: SPC supports Proposal 144. This proposal if passed will provide for a timely and more complete set of data to cover the rapidly increasing use of rental boats for nonguided, nonresident anglers that are visiting lodges that don't provide guides on the boats they rent. This is particularly true of lodges that provide bareboat rentals in remote areas like Pelican, Excursion Inlet and Elfin Cove which are highly productive and growing in numbers but not sufficiently monitored. The creel census does not cover these remote areas, nor does it cover lodges with private docks. These operations are growing and so is their harvest. SPC would like to note that ADF&G has existing efficient electronic systems to collect data from both charter boats and commercial buyers. Either system could be applied to boat rental business. They are commercial operations and should be monitored accordingly. Both Proposals 84 and 87 mention the electronic reporting concept. SPC supports the electronic reporting concept mentioned in those two proposals but only those parts of those proposals.

Proposal 225: SPC opposes Proposal 225. Proposal 225 seeks to increase the annual bag limit on sablefish for nonresidents. Sablefish is a very important product for SPC. The commercial harvest of sablefish is limited by two different types of permit and quota systems, in both Federal and State waters. We would like to see the current nonresident annual limit maintained, as most of the clients are hiring guides to catch the sablefish and there is no limit on the vessel number or guide licenses for harvesting sablefish. As a result, the nonresident sport sablefish catch has been rising rapidly even with the current limits, forcing a reallocation of a fully allocated resource.

Finally, SPC offers these comments on the ADFG's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. SPC supports option A, the status quo, for the troll fleet. The areas that would be restricted under the Increased Management Options would close most of the areas that remain available for trollers to access Alaska hatchery produced king salmon. The current policies for SOC were implemented in 2018. Part of the reason the handful of remaining openers have been allowed to continue is that by



board directive they are limited to areas where there is no significant harvest of the SOC's.

There has been very limited opportunity for trollers to fish between March 15 and July 1 since the SOC policies were implemented in 2018. The economic harm to the troll fleet and SPC would be substantial if the hatchery access openers were to be closed in the Sitka area. There would be no significant gain for the SOC's. SPC is one of a limited number of processors in the region that buys troll kings during the spring hatchery access openers in May and June. We buy from members and nonmembers during that time, providing an opportunity for trollers to sell the kings they catch at a very high price. We also provide our customers with Alaska king salmon during a time when there is not much available, and we leverage those king salmon to sell other products too. Last year, thanks to the high proportion of hatchery kings and the high prices of that time of year, trollers in the Sitka area made nearly \$1M during the spring openings. If these kings were not caught in the spring, nearly half of that value would have been lost.

Thank you all for reading and your consideration of our comments.
Sincerely,

SPC President Norm Pillen
Npillen@spcsales.com

SPC Chair Tad Fujioka
Chairman@spcsales.com

SPC VC Carter Hughes
Carterhughes@hotmail.com



Sealaska Corporation Comments in Opposition to Proposals 159-161

Submitted to the Alaska Board of Fisheries

Southeast and Yakutat Finfish and Shellfish Meeting
Jan. 4-15, 2022

December 21, 2021

Board Meeting: Southeast and Yakutat Finfish and Shellfish

Name: Jon Tillinghast on behalf of Sealaska Corporation

Phone: (907) 321-3405

Email: jon@stsl.com

Address: One Sealaska Plaza, Ste 300, Juneau, AK 99801

Consent to include contact information on printed copies of this document is granted.



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**Sealaska Corporation Comments in Opposition to Proposals 159-161
Submitted to the Alaska Board of Fisheries
Southeast and Yakutat Finfish and Shellfish Meeting
Jan. 4-15, 2022**

December 21, 2021

1. Sealaska's Interest

A. Sealaska's stake in the Sitka subsistence herring roe fishery

Sealaska Corporation is the regional corporation for Southeast Alaska under the Alaska Native Claims Settlement Act. Many of its some 23,000 shareholders participate in, and are dependent upon, the traditional sharing of the subsistence harvest of Sitka herring roe that is threatened by the proposals addressed here.

Sealaska remains at the forefront of the effort to protect traditional Native culture, including protecting our shareholders' subsistence fishing rights. This mission is perhaps best exemplified by the creation of Sealaska Heritage Institute, a Sealaska subsidiary that is nationally prominent as a guardian and advocate for Northwest Native art and culture.^{1/}

Moreover, Sealaska plays a direct role in the traditional annual distribution of subsistence-harvested herring roe from Sitka Sound. As recounted in a recent comprehensive study on the role that the sharing of subsistence resources plays in sustaining Alaska Native culture:

Between 2002 and 2018, herring eggs were shared with 41 other communities in Southeast Alaska and beyond. Recently, herring eggs have also been shared with institutions in Sitka and Juneau that provide food to Indigenous residents and others who might desire them. In Sitka,

^{1/} / See: <https://www.sealaskaheritage.org/>



individual harvesters and designated harvesters deliver fish eggs to the Sitka Senior Center, Sitka Salvation Army, SEARHC hospital, and the Sitka Pioneer Home...Herring eggs are distributed to institutions in Juneau as well through Sealaska Corporation. The Hoonah Indian Association provides financial assistance to a Hoonah harvester who travels to Sitka Sound every year to obtain herring eggs that are brought back to the community and shared without cost to up to 200 individuals. The distribution of subsistence herring eggs harvested from Sitka Sound is prodigious, with 87% of the overall harvest volume given away, on average, rather than personally consumed by harvesters and their households.

S. Langdon, *The Significance of Sharing Resources in Sustaining Indigenous Alaskan Communities and Cultures* (2021) at 30 (*emphasis added*) (“Langdon Study”).² /

B. The Reason for Southeast Alaska Natives’ concern over the Sitka subsistence fishery

Over the past decades, the adversity between ADF&G and Alaska Natives over the Sitka subsistence herring roe fishery has been palpable. The reason for the tension has been this: the fact of the matter is that, due to commercial over-fishing, all of the once-significant subsistence herring fisheries in our region other than Sitka (and a far more limited herring-on-kelp fishery near Craig) have been essentially wiped out. The Sitka subsistence fishery is the last of its kind.

Extraordinarily productive subsistence fisheries once existed throughout the region. Today, ADF&G’s herring management plan for these fisheries reads like a litany of the dead. According to the agency:

² / Available at:
<https://www.sealaskaheritage.org/sites/default/files/Significance%20of%20Sharing%20final%20with%20cover.pdf>



Revilla Channel. Once a major fishery (*see below*), “[f]rom 2000 through 2020, the minimum threshold was not reached in state managed waters and a fishery was not permitted.”^{3/} “The last commercial fishery occurred in 1998.”^{4/}

West Behm Canal. “From 2005 to 2010, the threshold was not met, and no fishery occurred...In 2012, ...due to inseason concern over lack of herring observed in the West Behm Canal area, the fishery did not open. From 2013 through 2020, the threshold was not met, and no fishery occurred.” *2021 Herring Plan* at 5. “No herring samples were obtained” in 2021, ADF&G noting that “[t]he last commercial fishery occurred in 2011.” *2021 Herring Summary* at 1.

Seymour Canal. “A spawn deposition survey was not conducted as the spawn observed in 2020 was limited in extent and duration. The Seymour Canal set gillnet herring fishery will not be opened in 2021.” *2021 Herring Plan* at 5. The last commercial fishery here occurred in 2014. *2021 Herring Summary* at 2.

Hobart/Houghton. “Herring biomass estimates did not meet the minimum threshold to allow fisheries in 2001–2004, 2006, 2007, and 2011–2020.” *2021 Herring Plan* at 6.

Auke Bay/Lynn Canal. As we shall see, Auke Bay once provided one of the most storied subsistence fisheries in the region. Not anymore. “Commercial fisheries last occurred in 1982, and the commercial sac roe herring fishery was repealed by the Board of Fisheries in 2018.” *2021 Herring Summary* at 2. And things are not getting any better.

^{3/} Dupuis *et al.*, *2021 Southeast Alaska Herring Sac Roe Fishery Management Plan*, Reg. Info. Rpt. 1J21-04 (Feb. 2021) at 5 (hereinafter “*2021 Herring Plan*”).

^{4/} ADF&G, *2021 Southeast Herring Summary* (May 28, 2021) at 1 (hereinafter “*2021 Herring Summary*”).



2021 surveying produced “the smallest total cumulative spawn mileage...since regular observations began in 1972...” *Id.*

Hoonah Sound. “No spawn has been documented since 2015 ...A commercial fishery last took place in 2012.” *2021 Herring Summary* at 2.

A closer look at two of these former fisheries illuminates the cause:

Auke Bay/Lynn Canal

The subsistence herring fishery at Auke Bay, at the southern end of Lynn Canal, “was a keen feature of community life until its collapse in the 1980’s due to overfishing by the commercial sac roe fishery.” ^{5/} The Áak’w Kwáan Tlingit settled along Indian Cove on the lip of the bay during the Little Ice Age (cir. 1500) precisely because of its abundant food resources--especially herring. *Id.* Over the next 500 years, explorers, scientists and federal officials consistently highlighted the area’s extraordinary herring population, ranking it the “third most important in Southeast Alaska.” *Id.* at 155.

In fact, the Áak’w Kwáan Tlingit moved their village away from Indian Cove to avoid disturbing the herring spawn. *Id.* at 151. Juneau and Hoonah elders are rich in stories of the ease with which they caught herring:

- ✓ “Auke Bay at that time (the 1970’s) was so full of herring that as soon as they showed up, there was plenty of salmon”;
- ✓ “[Y]ou used to be able to go to Auke Bay and get buckets full of herring for eating”; and

^{5/} T. Thornton and M. Moss, *Herring and People of the North Pacific: Sustaining a Keystone Species*,” Univ. of Wash. Press (2021) (“*Thornton Study*”) at 151.



- ✓ “[W]hen I was a kid going to high school in Juneau back in the early [19]60’s, late 50’s, go out to Auke Bay and catch herring off the beach with a dip net.”

Id. at 153. Then, in the 1970’s, ADF&G opened a purse seine and gillnet sack roe fishery in Lynn Canal. *Id.* at 155; *see also 2021 Herring Summary* at Table 3. In 1982, ADF&G’s biologists, looking at low forecast herring returns, recommended that the fishery be closed for that year. *Thornton Study* at 155. However:

Just as with the reduction fishery of 1940, political pressure from the fishing industry overrode scientific advice, and the 1982 sac roe harvest of 551 tons marked the last significant spawning of herring in the area.

Id. In summary: “Scientific and historical accounts of Auke Bay agree that Auke Bay was overfished during the sac roe era, leading to its collapse as a spawning area in the early 1980’s.” *Id.*

Kah Shakes (Revilla Channel)

According to Tlingit elder Martin Perez, Sr., “[p]eople won’t believe you when you tell them how much herring used to be around [at Kah Shakes]...[You could] go up in any harbor where you anchor and you...[could] jig herring with treble hooks and you’ll get ‘em for eating, just jigging them.” ^{6/}

Not today. In 1976, ADF&G opened a gill net fishery in the Kah Shakes management area. By the late 1980’s, there was trouble. In 1989, the commercial roe

^{6/} Jamie Sue Hebert, *Event Ecology: An Analysis of Discourses Surrounding the Disappearance of the Kah Shakes Cove Herring* (2011) at 37-38 (hereinafter “*Hebert Report*”); available at https://pdxscholar.library.pdx.edu/open_access_etds/5/.



harvest was a mere 595 tons, and in 1990 there was no harvest at all. *2021 Herring Plan* at Table 1

At the outset of the 1991 season, there was no appreciable spawning at Kah Shakes. *Id.* at 43. Undaunted, ADF&G found a large spawning group 12 miles away at Cat Island. Assuming that these were the errant Kah Shakes herring, ADF&G issued an emergency order expanding the Kah Shakes' management area boundaries to include Cat Island. *Id.* at 33-34. This although managers from the Metlakatla Indian Reservation on nearby Annette Island, a geography on the opposite side of Cat Island, insisted that these were the Reservation's herring. *Id.* at 46; *See also Thornton Study* at 170. The Board of Fisheries subsequently made the boundary change permanent anyway and changed the management area's name to "Revilla Channel."

ADF&G's actions in 1991 raised the obvious questions:

- Should the declining harvests in 1989-1990, and the near disappearance of spawn in 1991, have signaled to the agency that the fishery was in distress?;
- or
- Was it good management for ADF&G to latch onto a school of herring 12 miles away (herring that might or might not have been tied to the Kah Shakes herring) in order to conduct business as usual?

History teaches that inflating the Kah Shakes' numbers by capturing the Cat Island herring, thereby enabling the agency to ignore the warning signs, was a bad idea. By 1999, there was insufficient spawn at either Kah Shakes or Cat Island to support any fishery at all, and there has never been a fishery since. As Dr. Thornton concluded:



While the possibility that the herring ‘moved’ cannot be ruled out, the state’s failure to investigate the causes of the event clearly reflects the political-economic pressure on managers to ‘find fish’ for a commercial fishery...

*...From this example, it is easy to see how [local traditional knowledge] bearers might view herring as going the way of the cod via ‘managed annihilation,’ with remnant fish populations continuing to school at key spawning and massing sites, which are fished commercially for roe until, finally, **even with the scales reframed**, minimum quotas for harvest can no longer be met.*

Id. at 170-71; *emphasis added.*

At this point, the universal reply to all of this is that the rules are stricter now, and we’ll all do better. That’s what folks invariably say after any man-made disaster. But given the seriatim collapse of virtually every subsistence herring fishery in Southeast Alaska other than Sitka (and on smaller scale, Craig), the Tlingit, Haida and Tsimshian of the Archipelago can be forgiven their fear that the past may be prologue.

2. Proposals 159-160: Repealing the Board’s Protections for the Subsistence Herring Roe Fishery and Shrinking the Core Subsistence Area

The Southeast Herring Conservation Alliance (the “Alliance”), a trade group of commercial herring sac roe purse seiners, proposes to:

- ✓ materially diminish one of the pillars of the Board’s effort to meet its statutory duty of assuring a “reasonable opportunity for subsistence uses” of Sitka herring roe (AS 16.05.258(b)(1)(A)) (Proposal 160); and
- ✓ flat out repeal the other pillar (Proposal 159).

For each of these reasons, the Board should reject both proposals:



A. The Alliance’s proposals would strip ADF&G, and the Board itself, of one of the principal defenses that ADF&G has relied upon in claiming that the Board is meeting its statutory duties towards subsistence fishing

Proposal 159 would repeal 5 AAC 27.195, which requires ADF&G to disperse the commercial sac roe fishery when necessary to protect subsistence, and to keep the quality and quantity of subsistence-caught herring in mind when managing the commercial fishery. For its part, Proposal 160 would repeal the Board’s 2018 expansion of Sitka’s core subsistence waters that are closed to commercial harvest, reducing that core area by roughly four square miles.

In so doing, the Board would be disabling (and one case removing altogether) the two principal Sitka-specific protections that the Board has adopted to protect the Sound’s subsistence fishery. And, based on ADF&G’s repeated representations to the court in the *Sitka herring litigation*, these are precisely the two provisions that enabled the Board, and ADF&G itself, to meet their statutory obligations under AS 16.05.258. ^{7/}

Take, first, Proposal 160 (shrinking the core protected subsistence area). The area targeted by the Alliance was added to the core area in 2018. According to ADF&G’s representations to the court in the *Sitka herring litigation*, that addition enabled the Board to find that it was resultantly providing a “reasonable opportunity” for subsistence use. As ADF&G told the court: “At the [2018 Board] meeting, a third Board member (Alan Cain) stated that, ***with the increased commercial closure area provided by Board’s adoption of***

^{7/} The “*Sitka herring litigation*” is: *Sitka Tribe of Alaska v. State of Alaska et al.*, 1SI-18-212(CIV) (Alaska Super.Ct., 1st Jud. Dst.).



Proposal 106 [the four-square mile addition], he agreed that there is a reasonable opportunity for subsistence uses.”^{8/} ADF&G also quoted Board member Cain as saying:

*I think we need to be equally diligent in ensuring that the subsistence harvesters have a reasonable opportunity and **I think this** [the 4-square mile addition] **does this**.*

Id.; *emphasis added*.

ADF&G was even louder in its insistence that 5 AAC 27.195 (which the Alliance proposes to repeal in Proposal 159) was a linchpin of the Board’s compliance with §258. ADF&G’s foundational argument in the *Sitka herring litigation* was that there was a “Board[] decision that management of the fisheries pursuant to 5 AAC 27.195 provides a reasonable opportunity for subsistence harvest in Sitka Sound,” adding that:

*[T]he Board has made an assessment of reasonable opportunity and found that it is provided for **within the regulatory regime that it has promulgated**.*

Reply in Support of State of Alaska’s Motion for Summary Judgment: Count 1 (Jan. 20, 2020) at 10-11 (*emphasis added*). In another court memorandum, ADF&G insisted that:

*In fact, **for the Board to conclude that management pursuant to 5 AAC 27.195(a)(2) provides a reasonable opportunity for subsistence, as it did during the January 2018 BOF meeting, it necessarily factored in the requirement that the Department distribute the commercial fishery by time and area if the ADF&G manager determines that doing so is necessary to ensure that subsistence users have a reasonable opportunity to harvest the amount herring spawn necessary for subsistence uses.***

^{8/} *Id.*, *Memorandum in Support of State’s Motion for Summary Judgment: Count 1* (Nov. 27, 2019) at 13 (*emphasis added*).



State of Alaska's Opposition to Sitka Tribe of Alaska's Motion for Summary Judgment
(Dec. 20, 2019) at 18 (emphasis added).

ADF&G staff has taken a “Neutral” position on Proposal 159, claiming that, even if §195 is repealed, the agency would still follow the substance of the rule.^{9/} An unenforceable promise, however, is no substitute for a binding regulation, and Sealaska has little doubt that courts would view skeptically any assertion that the degree of protection afforded the Sitka subsistence fishery was unchanged, even though the regulation touted by the agency as the source of that protection had been gutted.

In summary: as a cornerstone of its defense in the *Sitka herring litigation*, ADF&G persistently sought refuge in the Board's 2018 expansion of the subsistence core area and 5 AAC 27.195 in arguing that the State was providing a reasonable subsistence opportunity. Pull that rug out from under the Board, and both the Board and ADF&G may find themselves in trouble.^{10/}

B. Neither the history of the past two decades, nor ADF&G's forecasts, provides any cause to relax the Board's existing subsistence protections

For 2021, ADF&G forecasted an extraordinary return of 175,731 tons of mature, 5-year-old herring to Sitka Sound.^{11/} While cohort spikes in herring returns are not

^{9/} ADF&G, *Staff Comments on Regulatory Proposals; Committee of the Whole—Groups 1-8; For the Southeast and Yakutat Finfish and Shellfish Alaska Board of Fisheries Meeting*, Regional Information Report No. 1J21-15 at 173 (hereinafter “*ADF&G Staff Comments*”).

^{10/} Bear in mind that all of the ADF&G statements made in this subsection are of recent origin, and they post-date the earlier events that the Alliance claims in its proposal makes §195 “outdated.”

^{11/} Dressel, *2021 herring forecast for Sitka* (2/21/21) at 13 (hereinafter “*2021 Forecast*”).



uncommon,^{12/} ADF&G scientists stress that year's spike "remains considerably greater than what could be considered 'normal,'" introducing "unusually large uncertainty."^{13/}

Looking both backward and forward, one year's sample does not offset the troubled nature of both the commercial and subsistence fisheries. For example:

- The Board has determined that 136,000 – 227,000 pounds represents the amount of Sitka Sound herring eggs reasonably necessary to meet subsistence needs. 5 AAC 01.716(b). Subsistence harvests fell short (usually well short) of that benchmark in 12 of the 19 years between 2002-2020^{14/};
- The 2018 commercial fishery yielded only 2,926 tons—well short of the 11,128 ton guideline harvest level;^{15/}
- Due to the absence of mature, fecund herring, there was no commercial fishery at all in 2019 or 2020; and^{16/}
- Looking forward, ADF&G forecasts a near-complete collapse of mature, 5-year old herring recruitment in 2022, with a negligible 47 tons projected to return that

^{12/} See Hebert, *Southeast Alaska 2019 Herring Stock Assessment, Fishery Data Series 20-23* (Dec., 2020) at Figure 45(hereinafter "2019 Herring Assessment").

^{13/} Dressel, Dec. 16, 2020 email to Trevor Branch, *Attachment 1 hereto* at 2.

^{14/} ADF&G, *Subsistence Harvest of Herring Eggs in Sitka Sound, 2021 Herring preseason meeting*, March 12, 2021 at 8, available at: https://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/meetings/herring/2019_2020_herring_harvest_results.pdf

^{15/} *2021 Herring Plan* at Table 3.

^{16/} ADF&G press release, *Sitka Sound Sac Roe Fishery Announcement*, May 17, 2019 at 1; ADF&G press release, *Sitka Sound Herring Fishery Announcement*, April 30, 2020. While the failure of the 2020 fishery was also plainly influenced by COVID-19, ADF&G concluded that the fishery failed because "[p]rocessors indicated that herring of [this] small size would be below market requirements..." *Id.*



year. *2021 Forecast* at 13. 2023 appears nearly as bleak, with only 3876 tons of what will then be 5-year-old fish predicted to return.^{17/}

Thus, when viewed through a wide-angle lens, Sitka Sound does not seem a good candidate for gutting the Board's existing efforts to meet its statutory obligation to provide a reasonable opportunity to meet subsistence needs.

C. There remains material uncertainty in any ADF&G forecast because of the agency's inability to implement admittedly-needed 2016 forecast model revisions

To forecast Sitka Sound herring returns, ADF&G uses an age-structured assessment model. One of the acknowledged shortcomings of that ASA model is its inability to account for the wide range of uncertainties that can seriously skew any forecast. As ADF&G's forecaster explained to her University of Washington colleagues:

We aren't currently using the Bayesian age-structured mode yet for SE herring (it is so close to being ready, but we didn't finish before Jane took her new position with NOAA), so we don't have estimated uncertainty with our forecasts...

Attachment 1 at 2.

There is no dispute that the ADF&G's existing model needs revision. As ADF&G's Dr. Sherri Dressel put it in her *Sitka herring litigation* deposition:

We were hoping to implement the new model structure, which will have error estimates as Greg—is it Ruggerone?—had asked for and something we have been working on for a long time.

^{17/} The 5-year-old cohort represents the first year of fully mature, fecund herring. ADF&G research has shown that only 19% of 3-year-old Sitka Sound herring are considered mature, while even 4-year-olds are only "partially mature." *2021 Forecast* at 6; *2019 Herring Assessment* at 75.



Deposition of Dr. Sherri Dressel, 10/29/2019 at 63.^{18/} To that end, ADF&G contracted with Dr. Steve Martell—“the same stock assessment scientist that developed one for Canada.” *Dressel deposition* at 62. Dr. Martell delivered his final report and recommendations to ADF&G on December 16, 2016.^{19/}

In the intervening five years, ADF&G has been unable to implement Dr. Martell’s model changes. On November 30, 2020, Sealaska petitioned ADF&G to continue to adopt a conservative guideline harvest level for Sitka herring until the agency is able to implement the Martell model. *Attachment 3*. The request appended a report by Dr. Merrill Rudd that concluded:

It is my opinion that there are many additional uncertainties associated with the ASA model and forecast that would be improved when Dr. Martell’s proposed changes are implemented. Therefore, ADF&G should continue to adopt a precautionary GHL at least until it is able to implement the proposed changes by Dr. Martell. The model structure proposed by Dr. Martell is currently being used by British Columbia to forecast its herring returns, and it would address many of the shortcomings that exist in ADF&G’s existing model and forecast.

Attachment 4 at 1. According to an internal email, ADF&G “decided [that] no response is needed to this request.” *Attachment 5*.

Compounding the problem is the admittedly-outdated “threshold” for allowing any commercial sac roe harvest in Sitka. Currently, that number is 25,000 tons—a figure

^{18/} As ADF&G staff advised the Board in October, 2019: “The department is in the process of upgrading the model used to forecast herring biomass and, in the future, intends to use the new model to re-evaluate the harvest strategy..in [the] Sound. However, the model and analysis are currently in development and review and the results are not yet available.” *ADF&G Staff Comments on ACR 4*, quoted at *Sitka Herring litigation, Southeast Alaska Conservation Alliance Motion for Summary Judgment on Count II*, 10/1/2020 at 8.

^{19/} The executive summary of Dr. Martell report is appended as *Attachment 2*.



calculated as a percentage of the estimated “unfished” biomass of Sitka Sound herring. 5 AAC 27.160(g); *Sitka herring litigation, Affidavit of Kyle Hebert, 2/4/2019* at Ex. 2, p. 19. That estimate was made in a 1998 report using data from 1971-1993.^{20/} This was an “unproductive period of herring abundance...compared with more productive periods during the 2000s and 1930s.”^{21/} As Dr. Dressel explained in her deposition, the higher the estimate of unfished biomass, the higher the threshold for allowing any harvest; and, “[i]f we estimate a higher biomass, we almost certainly would propose to the Board of Fish that we think that the threshold should go up.” *Id.* at 75.

However, while it is ADF&G’s “goal” to update the unfished biomass estimate,^{22/} the agency has apparently decided to undertake the needed revisions only in conjunction with the still-awaited implementation of the Martell recommendations. *See Dressel deposition* at 63.

It is not the intent of this narrative to fault ADF&G. It would seem that funding and personnel challenges have prevented the agency from implementing Martell’s 2016 recommendations. But as Dr. Dressel candidly put it to University of Washington scientists, until that happens, ADF&G will continue to be forced to make “subjective” judgments about the reliability of its forecasts. And that certainly does not engender the kind of certitude one would think necessary before stripping away existing subsistence protections.

²⁰ / Carlile, *Estimation and Evaluation of a Harvest Threshold for Management of the Sitka Herring Sac Roe Fishery Based on a Percentage of Average Unfished Biomass*, DFG Regional Informational Rpt. 1J98-f18 (July, 1998) at 13.

²¹ / *Sitka herring litigation, Affidavit of Gregory T. Ruggerone, 1/14/2019* at 7.

²² / *Sitka herring litigation, Deposition of Kyle Hebert, 10/29/20219* at 75.



D. The closed area the Alliance seeks to access is important to providing a reasonable opportunity for the subsistence harvest

There is no small measure of hubris in the Alliance's proposal to retract the 2018 subsistence zone additions. That acreage, the Alliance argues, once "yielded substantial portions of the [commercial] harvest," and could presumably do so again if the commercial fleet could get at it. Conversely, repurposing the area to the commercial fishery would have "little or no effect" on the subsistence harvest. In other words: the same spawning herring are important to us, but not to you.

Truth is, if relative importance were a litmus test, the scales would tip heavily towards the subsistence user. The closed area (including the area at issue here) lies along the Sitka road system and is hence accessible to those Sitka subsistence harvesters who own only a skiff. Conversely, the purse seine vessels have the rougher waters of the entire Sound at their disposal. Put another way: the Alliance is arguing that purse seiners' convenience should trump subsistence harvesters' necessity.^{23/}

²³ / To our knowledge, no one is contending that the two fisheries can co-exist within these confined geographies over the same time span. Whether by industrial disruption of spawning activity or, most directly, by harvesting the herring before they can spawn on any branches, the commercial fishery well-nigh obliterates any attempt at subsistence harvest in that same area. Indeed, ADF&G attempts to steer the commercial fishery away from even the edges of the closed areas in order to avoid the obvious impact that fishing on the closed area borders would have on the hemlock branch harvest. According to ADF&G's Eric Coonradt:

We try to have openings away from the commercial closed area whenever we possibly can So if we have - if we have opportunities close to the closed area or let's say we have an opportunity right on the border of the closed area and we also have an opportunity a mile away. We would, everything being equal, we would choose the opportunity further away.

Sitka herring litigation, Deposition of Eric Coonradt, July 30, 2019 at 51.



According to ADF&G: “[o]ut of the 102.3 nmi of mapped herring spawn in Sitka Sound, approximately 29.0 nmi of herring spawn was mapped with the regulatory close waters.” *ADF&G Press Release, Sitka Sound Herring Fishery Announcement, 4/30/2021* at 1. Moreover, substantial herring schooling and spawning was observed specifically within the 2018 addition area. ^{24/}

For each of the reasons listed above, Sealaska respectfully requests the Board to reject Proposals 159 and 160.

3. Proposal 161: Imposition of a Permit or Registration Requirement

The Alliance also proposes to “[r]equire a subsistence fishing permit” for Sitka’s traditional subsistence fishery. One of the Alliance’s goals is to acquire better data on the size of the subsistence harvest, and Sealaska shares that goal. However, ADF&G staff, in its comments on Proposal 161, has concluded that “[r]easonably accurate harvest information can be obtained through the current harvest monitoring program,” and “[a] permit and reporting of harvest requirement would not result in more accurate harvest data...” *ADF&G Staff Comments* at 180. Moreover, the Alliance’s recommended tool is a meat ax—one chosen without the slightest apparent sensitivity to the harm to Alaska Native culture that may well flow from applying an ill-suited solution to an acknowledged challenge.

²⁴ / ADF&G noted a “large biomass of herring in the regulatory closed waters extending from Eliason Harbor to Starrigavan Bay,” and as well in the closed-water vicinity of Old Sitka Rocks and along a line extending from Lisianski Point to Watson Point—a line that intersects the 2018 closed water addition. *ADF&G Press Releases, Sitka Sound Herring Fishery Announcements [Updates]*, March 28, 29, 31 and April 2, 2021.



In a nutshell, the default paradigm for an ADF&G permit is as an *individual* authorization coupled with the imposition of *individual* regulatory burdens (and the Alliance proposes no variation from that paradigm). The Sitka subsistence fishery, conversely, is a *communal* fishery, in which the individual harvesters act on behalf of Tlingit, Haida and Tsimshian Indians throughout the region, and, indeed, Alaska Natives throughout the state.

A. The communal nature of the Sitka herring roe subsistence fishery

As noted *ante*, Dr. Stephen Langdon found that, between 2002-2018, only 13% of the subsistence-caught Sitka herring roe was consumed by the harvesters themselves or their households. The other 87% was distributed throughout the state. *Langdon Study* at 30. As anthropologist Dr. Thomas Thornton found, this sharing occurs through “rich and resilient benefit flow networks” that “represent the triumph of communalism and conviviality.” ^{25/} As but one example of this “amazing distribution and sharing system,” Thornton notes that:

A fishing boat from Hoonah routinely brings back from Sitka between five thousand and twenty thousand pounds of herring eggs on branches (and some on kelp)—sometimes with support for fuel costs from the tribe and community—which are distributed to every household that desires them.

Id. at 202. The sharing of Sitka herring roe reflects more than just a food distribution system. To the contrary, roe distribution is of singular importance to the Alaska Native community for “complex cultural, nutritional, culinary, and social reasons.” *Langdon*

^{25/} T. Thornton and M. Moss, *Herring and People of the North Pacific: Sustaining a Keystone Species*,” Univ. of Wash. Press (2021) (“*Thornton Study*”) at 176.



Study at 30. “[T]he distribution, trade and exchange of herring eggs has an importance in its own right. Both with and between communities, this movement of herring eggs appears to provide an opportunity to fulfill social obligations and maintain cultural values” and is accordingly often used in “potlatches, payoff parties, mortuary feasts, and other cultural occasions.” ^{26/}

This tradition of regional sharing is of extraordinary cultural importance for a number of reasons, including these:

- For Alaska Natives that have left the village for urban centers, sharing provides a continuing lifeline to their heritage. As one Juneau Tlingit told Dr. Langdon: “For the Tlingits who’ve moved away from home, it’s our soul food, keeping us connected to one another and to place. If you receive herring eggs from someone, you know you are loved.” *Id.* at 31.
- “Herring eggs are special...[T]hey are the first ‘fruit’ of the season, heralding a new year of fishing and gathering. People share them widely and eat them communally, as part of this celebration.” *Thornton Study* at 202. As a Sitka elder recounted to Dr. Thornton:

*It would just be amazing when we’d arrive at [my aunt’s house each spring] because people came from a lot of different places...to have a feast. We’d arrive, and her table would be covered with layers of newspaper [upon which to lay out herring eggs]...Then all the stories would come out.
...[W]hen you believe that your food feeds your soul, all those people who touched your food, that imbued their love and respect into that food, it is one of the greatest gifts that we give to one another...*

^{26/} R. Schroder and M. Kookesh, *The Subsistence Harvest of Herring Eggs in Sitka Sound*, ADF&G Technical Paper 173 (1990) at 52-53.



Id.; and

- The herring itself sits at the apex of Southeast Natives' cultural pantheon. As Sitka elder Henry Kitka Sr. put, over the millenia:

*Herring come—whale come—sea lion—seal—king salmon—
everything eat herring, come—big time.*

Thornton Study at 118. Or, as one fisherman succinctly stated, herring are “the key to the ocean...It’s our buffalo.” ^{27/} Given that so much flows from the herring, it is unsurprising that herring (and herring egg) legends are so prominent in Tlingit, Haida and Tsimshian lore. Most conspicuous is the Kiks.ádi clan (Sitka Tribe) woman who immersed her hair in the waters below Sitka’s Herring Rock. Herring began spawning on her hair, leading to today’s practice to collecting roe on hemlock branches. *Thornton Study* at 119.

Parenthetically, Herring Rock remained hallowed ground for Sitka Tlingit, until real estate developers blew it up. *Id.*

B. Sharing of subsistence resources is central to Alaska Native culture

The sharing of subsistence-caught resources is sinew that binds Alaska Native culture together. “As a central value and practice characteristic of all Indigenous Alaskan societies, sharing of subsistence resources was and is a foundation of Indigenous life and livelihood. Sharing is both glue in binding extended families together and lubricant promoting expansion of social ties.” *Langdon Study* at 1. Sharing guides Alaska Natives’

²⁷ / T. Thornton and J. Hebert, *Neoliberal and neo-communal herring fisheries in Southeast Alaska: Reframing sustainability in marine ecosystems*, Marine Pol. 2014 at 5.



ethical compass: it reflects a “deeply embedded cultural value” that “translates into moral and ethical obligations for producers and those with resources to give to others particularly if they are in need and without expecting a return.” *Id.* at 8, 10.

Sharing is also “at the center of a spiritual belief system recognizing the joint nature of existence and necessary interdependence of humans, fish, birds and animals to continuity.” *Id.* at 44.

Sharing is not simply inviting a friend to dinner. Rather, it is an unwritten constitutional code laid down by the village tribe, its elders and tradition:

Subsistence is more than a means of production, it is a system for distribution and exchange of subsistence products. The system is not random: it operates according to complex codes of participation, partnership, and obligation. Traditional rules of distribution ensure that subsistence products are available to every village household, even those without hunters.

Id. at 8.

C. Disrupting a traditional sharing system threatens the foundations of Alaska Native culture

It stands to reason that disruption of a practice so elemental to Alaska Native culture will threaten that culture itself. And the *Langdon Study* bears that out. As we have already seen, the ethical underpinning of sharing is the need to assure food security for the entire village. “Sharing is one of the primary institutions through which the harvests of the high producing ‘superhouseholds’ reach others, especially those in need.” *Id.* The “superproducers” obligation becomes paramount when caring for village elders:

The sharing of traditional foods with Elders is especially important as they are a necessity for feeling healthy and staying active and are believed to contribute to longevity. It is believed by many Indigenous



Alaskans that Elders ... have developed physiological and possibly psychological dependence on such foods.

Id. at 13. And, it seems that the most effective way to sabotage a community's traditional sharing system, and hence the community's underlying culture, is to undermine the community's ability to rely on "superproviders" to meet the community's needs. *Id.* at 41. In an analysis performed on three villages (Kaktovik, Wainwright and Venetie), the scientists' hypothetical removal of "key social relations, meaning critical 'superprovider' nodes" caused a projected 70%-80% decline in sharing between households--more severe than either a reduction in resource abundance or reduction in community households. *Id.*

D. A permit requirement imposed on the "superproviders" of Sitka herring roe risks irreparable damage to Tlingit, Haida and Tsimshian culture

At the outset, forcing those who harvest herring roe in Sitka's subsistence fishery on behalf of the entire region to obtain an individual permit fundamentally alters the nature and purpose of the harvest. The harvest becomes an individual, not a communal act, and the harvested roe becomes associated with the permittee, not the community. That is a bedrock cultural distinction that the Alliance proposal simply ignores. In a report on the village of Venetie quoted by Dr. Langdon, the authors observed that:

...sharing and cooperation were described as cultural markers that distinguish the indigenous user from other harvesters such as urban hunters seeking trophy animals... Sharing sustains ongoing bonds and creates new relationships thereby enhancing the emotional and physical well-being of those who give and receive....

Id. at 15 (*internal cites omitted*). It is critical, Langdon concludes, that regulators understand this very different paradigm and encourage a "regulatory environment that...does not constrain sharing." *Id.* at 48.



There are also more earthy (but no less significant) threats posed by a permit requirement. Some ADF&G herring and herring roe permit requirements include a harvest limit—one usually calculated on the basis of individual or household consumption.^{28/} And while harvest limits do not necessarily flow from a permit requirement, crossing the permit Rubicon is almost invariably just a first step in the imposition of harvest constraints that simply would not fit the communal nature of the fishery.

Moreover, while 87% of the harvested roe is shared regionwide (and beyond), the entire regulatory burden of a permit would fall unfairly on the individuals harvesting that roe on behalf of the region. *See* 5 AAC 01.015(b). And the permittee would be the sole target of any enforcement action, although the overwhelming majority of beneficiaries of the harvest stretch (at least) from Metlakatla to Yakutat.

E. ADF&G should be tasked to work collaboratively with the region’s Alaska Natives to cure any shortcoming in the existing subsistence harvest monitoring program that has resulted in avoidable delays in publishing subsistence harvest data

As noted *ante*, ADF&G staff have concluded that a permit requirement would not result in the acquisition of more accurate or comprehensive harvest data. To the contrary, if a permit system resulted in discontinuance of the existing Tribal/ADF&G harvest monitoring program, the agency would lose access to “best available data important to this [subsistence] fishery that would be difficult to accurately capture from returned permits,”

^{28/} *See, e.g.*, 5 AAC 01.730 (Southeast Alaska herring roe on kelp; Limit: 32 pounds individual, 158 pounds household); 5 AAC 01.530 (Kodiak: 500 pounds herring/year).



including data on “sharing of herring eggs and specific details about the harvest efforts.”

ADF&G Staff Comments at 180.

ADF&G does suggest that a permit program could result in quicker assimilation and publication of subsistence harvest data, noting a 19-month delay in publishing data on the 2020 subsistence fishery. *Id.* Staff, however, does not explain the reason for the current lag in publishing subsistence data, nor why a permit requirement would remove that roadblock. It is equally plausible that any publication delay is due to staffing issues or other practical concerns that can be addressed through means less drastic than a ham-handed permit requirement.

There are numerous subsistence herring fisheries in the state that do not require a permit.^{29/} The Sitka fishery is no outlier in that regard. Moreover, Alaska law allows this Board to regulate fisheries on a community basis. AS 16.05.330(c) authorizes the Board to “adopt regulations providing for the issuance and expiration of subsistence permits for areas, villages, communities, groups, or individuals as needed for authorizing, regulating, and monitoring the subsistence harvest of fish and game.” To that end, for example, 5 AAC 01.620(h) authorize a community permit in the Glenallen area “to a village council...to operate fish wheels on behalf of members of its village...”

^{29/} See, e.g., 5 AAC 01.130 (Arctic: no permit required for subsistence herring and roe fishery designated in 5 AAC 01.136(1)); 5 AAC 01.180 (Norton Sound: no permit required for subsistence herring and roe fishery designated in 5 AAC 01.186(a)(1)); 5 AAC 01.230 (Yukon: no permit required for subsistence herring and roe fishery designated in 5 AAC 01.236(a)(3)); 5 AAC 01.280 (Kuskokwim: no permit required for the subsistence herring and roe fishery designated in 5 AAC 01.286(a)(4)); 5 AAC 01.330 (Bristol Bay: no permit required for subsistence herring spawn on kelp fishery designated in 5 AAC 01.336(a)(2)); 5 AAC 01.580 (Cook Inlet: no permit required for the herring fishery designated in 5 AAC 01.566(a)(4)).



Moreover, there is a history of collaboration between ADF&G and the Sitka Tribe on data gathering. In 2002, ADF&G and the Tribe entered into a memorandum of agreement (the “MOA”) providing, in part, for coordinated data gathering on the subsistence fishery. ADF&G unilaterally terminated the MOA in 2009. That MOA, however, was replaced with a collaborative Tribal/ADF&G monitoring program that ADF&G staff believes produces both accurate and comprehensive harvest data.

There have indeed been bottlenecks in the ultimate publication of that data. But there would seem nothing to prevent Native stakeholders and ADF&G from addressing any impediment to timely publication of the data within the framework of the existing collaborative effort. In that vein, Sealaska respectfully urges this Board to direct ADF&G’s Subsistence Section to work with the Sitka Tribe and other beneficiaries of this communal fishery to identify and resolve any such impediment.

It is emphatically not Sealaska’s position that no subsistence fishery is suitable for an individual permit. There are many subsistence fisheries in which the primary beneficiaries are the harvester or his/her household. There is always, however, a need to balance the regulatory benefits of a permit against the affected cultural values. And, when the fishery is of such an intensely communal (and regional) nature, and when the benefits of a permit program are so doubtful, those scales should tip towards protecting the region’s Alaska Native culture that is so tightly interwoven with that fishery.



Attachment 1



From: Dressel, Sherri C (DFG)
To: Bangs, Peter D (DFG)
Subject: FW: variability with large year class
Date: Thursday, February 25, 2021 12:28:49 PM
Attachments: [image001.png](#)
[image002.png](#)

From: Dressel, Sherri C (DFG)
Sent: Wednesday, December 16, 2020 2:05 PM
To: Trevor A Branch <tbranch@uw.edu>
Cc: John Trochta (john23@uw.edu) <john23@uw.edu>; Miller, Sara E (DFG) <sara.miller@alaska.gov>
Subject: RE: variability with large year class

Hi Trevor,

Many thanks for your quick reply and your suggestion. I see in Muradian et al. (2017) the additional error for the egg deposition survey was 4.0 and (as you noted before) the additional error for acoustics was a median of 0.34. Were these values approximations based on expert judgement? I can certainly cite, but thought I'd ask if there was additional information behind them since they seem somewhat specific.

Thanks again, I really appreciate it –
 Sherri

From: Trevor A Branch <tbranch@uw.edu>
Sent: Wednesday, December 16, 2020 1:24 PM
To: Dressel, Sherri C (DFG) <sherri.dressel@alaska.gov>
Cc: John Trochta (john23@uw.edu) <john23@uw.edu>; Miller, Sara E (DFG) <sara.miller@alaska.gov>
Subject: Re: variability with large year class

Hi Sherri:

John is pretty swamped right now preparing for his PhD defense in early Feb 2021, with some work still needed on his last chapter and pulling it all together. So he won't have much time to look at this before the dissertation is over.

My general suggestion is to base your decisions on the data for SE Alaska only. One option would be to look at the uncertainty in the eggs spawned in the *survey* inflate that somewhat (as we do for additional variance in the PWS herring assessment), and then apply that uncertainty to the median estimates from the ASA model.

e.g. in PWS herring the acoustic survey CV was 0.29 (lognormal sigma) and the estimated additional variance was CV = 0.34 (Table 3.11 and 3.13 in Muradian et al. 2017). From Table 5.8 the total variance is therefore $\sigma^2 = 0.29^2 + 0.34^2$, and the total CV (sigma) is $\sqrt{0.29^2 + 0.34^2} = 0.45$.

So in this instance you would base catches on the estimated biomass with a CV of 0.45. Perhaps you could set catches at say the lower 70th percentile of a lognormal with that CV. In R, the code for this would be

```
biomass <- 10000
reportedsurveyCV <- 0.30
additionalCV <- 0.34
finalCV <- sqrt(reportedsurveyCV^2 + additionalCV^2)

rnorms <- rnorm(n=100000, mean=0, sd=finalCV)
randoms <- biomass * exp(rnorms-0.5*finalCV^2) #the lognormal correction is -0.5*s^2

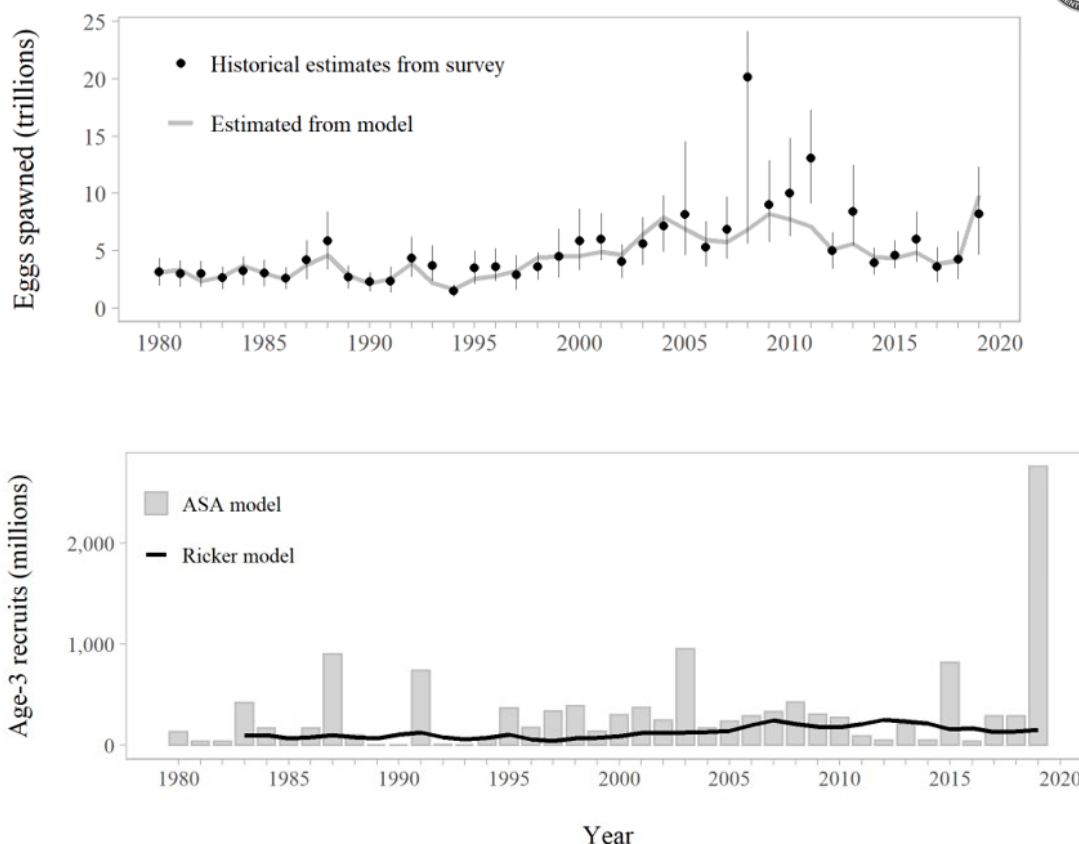
hist(randoms)
mean(randoms)
round(quantile(x=randoms, probs=seq(0.2,0.4,0.1)),0) #possible percentiles

#note: median of randoms is smaller than mean of randoms, which should be
#equal to biomass = 10000
```

On Wed, Dec 16, 2020 at 1:56 PM Dressel, Sherri C (DFG) <sherri.dressel@alaska.gov> wrote:

John and Trevor,

Wondering if you can help me with something. For State management of southeast herring, we have a sliding scale harvest rate (max 20%) when the population is above a fixed threshold. In years where we expect there is considerably greater uncertainty with the forecast than normal, managers have decremented the harvest level (say a fixed tonnage decrement which is comparable to reducing the harvest rate). As you know with your own data, the 2019 age-3 recruit class was substantial across the GOA. In PWS it wasn't as obvious because the magnitude of the population is low, but notably I think the size of the population doubled. For Sitka and Craig, that were at medium population levels, the populations also doubled and the recruitment has appeared even more impressive relative to past recruitments. From the 2020 forecast model for Sitka (and Craig was way more dramatic than Sitka):



We aren't currently using the Bayesian age-structured model yet for SE herring (it is so close to being ready, but we didn't finish before Jane took her new position with NOAA), so we don't have estimated uncertainty with our forecasts (credibility or posterior predictive intervals). Similar to what is done for federal stocks (North Pacific Fisheries Management Council), we only make decrements to the allowable harvest in relatively rare situations when there is considerable uncertainty likely not accounted for in the assessment or harvest rate strategy (so if there is unusually large uncertainty in the forecast due to a large incoming year-class or uncertainty in the maturity schedule that is not represented in the model, this qualifies). Although we don't have error estimates for our forecasts, due to the expected large uncertainty in the 2020 forecast with the magnitude of the exceptionally large 2019 year class, we did make a decrement to the harvest level last year. Since we don't have estimates of error I'm wondering whether the level of uncertainty that will propagate into the 2021 forecast now that we have seen the 2019 year class twice remains considerably greater than what could be considered "normal". This is a subjective determination and I fully realize that there is no normal, but I'm wondering if there is any information from the PWS BASA model that could help inform us. For instance, how did the posterior predictive intervals for the 2018 and 2019 PWS forecasts (without the 2019 year class) compare with your posterior predictive intervals for your 2020 and 2021 forecasts (with the 2019 year class)?

Any qualitative reasoning that you have regarding expected uncertainty would be welcome too. One of my concerns is that we know that the maturity schedules for these populations aren't particularly well known and with a large incoming year class, the impact of the maturity schedule is greater when forecasting (for year classes that aren't fully mature, like the age-3 class in 2019 and age-4 class in 2020).

Thanks for any thoughts,
Sherri

--

Richard C. and Lois M. Worthington Endowed Professor in Fisheries Management, School of Aquatic and Fisheries Sciences, University of Washington

Twitter: @TrevorABranch @BlueWhaleNews; <http://fish.washington.edu/people/branch/>

Branch TA, Monnahan CC (2020) Sex ratios in blue whales from conception onward: effects of space, time, and body size. Marine Mammal Science doi: 10.1111/mms.12741

Trochta JT, Branch TA, Shelton AO, Hay DE (2020) The highs and lows of herring: A meta-analysis of patterns in herring collapse and recovery. Fish and Fisheries 21:639-662

Monnahan CC, Branch TA, Thorson JT, Stewart IJ, Szuwalski CS (2019) Overcoming long Bayesian run times in integrated fisheries stock assessments. ICES Journal of Marine Science 76:1477-1488



Attachment 2



Age-structured model for Alaska herring stocks

Steve Martell

December 16, 2016

Executive Summary

This document describes the proposed changes that have been made to the Age-structured assessment model for Alaska herring stocks.

The objective of this project was to review and modify the existing AD Model Builder Code for the Age-structured model for Alaska herring stocks (version 0.1 Jan 2015). The overarching objective of the modifications are: to improve numerical stability, ease of use, general flexibility for alternative structural assumptions, and estimation of observation and process error variance to better quantify uncertainty. The following list of bullets summarizes the proposed changes that have been implemented to date:

- Modifications to the Input Data File. Users can now specify estimates of observation error for each annual observation for: catch, egg surveys, mile milt days, and composition data.
- Modifications to the Control file. Changes to the control file now allow users to estimate or fix parameters, change the phase of estimation, set initial parameter values, apply informative priors of various statistical distributions, all without having to recompile the code. This permits rapid exploration (even automated) of alternative hypotheses and structural assumptions that are repeatable.
- Added controls for the addition of time varying natural mortality rates, blocks of time-varying maturity, a flexible system from implementing a wide variety of selectivity options including time-varying blocks, or continuous non-parametric functions (i.e., cubic splines). The control file is also structured so it can expand with new model features, or custom outputs, that develop in the future.
- Custom command line options were added to the code. Two options were added to permit rapid simulation testing (`-sim` option), and automate the procedures of conducting retrospective analysis without having to make any potentially dangerous modifications to input files (the `-retro` option).
- Many of the previous routines in the current version of the stock assessment model have been broken down into smaller functions. This both reduces the amount of redundant code that currently exists and makes the code easier to read and understand by humans.
- The model has 5 major components:

1. Inputs (includes data and controls that specifies model structure).
 2. Population dynamics: a collection of sub-models that relate to the biology (e.g., natural mortality, maturity, stock-recruitment).
 3. Observation dynamics: a collection of sub-models that relate how fishing mortality interacts with population model (e.g., fisheries selectivity, fishing mortality, predicted egg abundance index, predicted composition data).
 4. Statistical criterion: the objective function that relates estimated model parameters to differences between observed and predicted variables.
 5. Outputs: including and not limited to parameter estimates, convergence criterion, derived management quantities and residuals.
- There are a few structural differences being proposed in this model that relate to how selectivity is modeled, the observation error assumed in the composition data, and variance terms that relate to both process error and observation error.
 - To avoid breaking the derivative chain in calculating the objective function and its gradient, use of the max function to re-scale the selectivities should be avoided. Often you can get away with it in very simple models where selectivity is very well informed, but can soon become problematic when your jointly estimating additional parameters that are confounded with selectivity (e.g., time-varying natural mortality). To do so, the proposed change rescales the selectivity vector for ages such that it has a mean of 1.
 - The previous generation used a least-square estimator for the age-composition proportions. The proposed changes implemented in this model assume the age-proportion data are logistic-normal, and these data are weighted by the conditional maximum likelihood estimate of the variance (i.e., objectively weighted). Alternatives likelihood formulations are also easily implemented in future iterations.
 - Lastly, each catch and survey observation in the input data file also has an associated log standard error associated with it (approximately the coefficient of variation). In cases where it is possible to estimate a standard error in the data using bootstrap procedures, the inter-annual variation in observation error can now be specified. In addition, the process error term permits recruitment variation around a stock-recruitment relationship. Currently the Ricker model is implemented, with the option to implement the Beverton-Holt model annotated in the code.
 - Additional elements were also introduced in the objective function calculation to improve the overall estimation robustness. These include penalties that are only implemented in the initial phases to set up initial gradients that will get key population parameters in the “ball park”. These penalties can then be relaxed (or set = 0) in the terminal phases.
 - Of significant difference is the use of informative prior distributions (or sometimes less informative) for population parameters including: natural mortality, initial recruitment, average recruitment, unfished recruitment, steepness of the stock recruitment relationship, and the variance in the recruitment deviations (process



error). The only option for including priors in the previous generation was to fix a parameter value (which implies the variance is 0, or very informative). For example, having the option to estimate natural mortality where the prior mean is set at the original fixed value and assume some arbitrary CV can often reduce model confounding in cases where there are one-way trips in the relative abundance data. Comparing the marginal posterior density and prior density will shed light on how informative the data are about the parameters.

- Model selection criterion can also be evaluated using Deviance Information Criterion (DIC). This criterion is calculated using the posterior sample values generated from one of AD Model Builders built-in sampling routines (e.g., The Metropolis Hastings Algorithm).

Lastly, a few R-scripts have been developed for the purposes of conducting simulation-estimation experiments for self-testing to examine for potential bias in the estimators, and exploring options for correcting any such bias.

An example assessment using the data for the 2015 Sitka herring stock is provided in this document. This example is not meant to be used as a comparison with other assessments for this stock. The intent of the example is to be illustrative. Finally, the scope of this project focused on the aforementioned points above, and primarily focuses on data weighting and estimation of uncertainty. There are many other graphical methods that could be explored to further communicate levels of uncertainty to fisheries managers, and I would refer you to the work of Dr. Ian Stewart at the Intl. Pacific Halibut Commission on communicating uncertainty to decision makers.

1 Acknowledgments

I greatly appreciate the feedback from the State of Alaska scientists who participated in the training workshop in Juneau Alaska, July 27-29, 2016. A special thank you to Dr. Sherri Dressel for organizing this workshop and inviting me to bid on this contract.

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Attachment 3

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SIMPSON, TILLINGHAST, SHEEHAN & ARAUJO, P.C.



PC318
35 of 45

ONE SEALASKA PLAZA, SUITE 300 • JUNEAU, ALASKA 99801
TELEPHONE: 907-586-1400 • FAX: 907-586-3065

Sent by email to: samuel.rabung@alaska.gov; lowell.fair@alaska.gov; troy.thynes@alaska.gov

Mr. Samuel Rabung
Director, Division of Commercial Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 98111-5526

and

Mr. Lowell Fair
Southeast Regional Supervisor
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 98111-5526

and

Mr. Troy Thynes
Salmon/Herring Fisheries Management Coordinator
Alaska Department of Fish and Game
P.O. Box 667
Petersburg, Alaska 99833-0667

Re: 2021 Guideline Harvest Level for Sitka Sac Roe Fishery

Dear Mssrs. Rabung, Fair and Thynes:

This firm represents Sealaska Corporation. Sealaska, through itself and its subsidiary Sealaska Heritage Institute, has been and remains deeply concerned over the health of the herring roe-on-branch subsistence fishery in Sitka Sound. That fishery is of singular economic and cultural importance to our region, and it has been a fishery adversely affected by a competing commercial sac roe fishery.

This month, the Department will be publishing the guideline harvest level ("GHL") for the 2021 commercial fishery under 5 AAC 27.160(g). For the reasons set out in the enclosed report by Dr. Merrill Rudd, Sealaska urges the Department to establish a precautionary GHL for the 2021 fishery at a level substantially below that suggested by application of the Department's Age Structure Assessment (or "ASA") model.

Because of model uncertainties, the Department established just such a precautionary GHL for the Sitka sac roe fishery for 2013 (25% below ASA indications) and 2020 (39% below). Equally consequential uncertainties exist now. In 2016, the Department solicited and received recommendations from Dr. Stephen Martell to address the limitations of the ASA model. As Dr. Dressel explained in her deposition in the ongoing litigation over the Sitka sac roe fishery: "[W]e



are moving towards a new model structure, which has been—designed by the same stock assessment scientist that developed the one for Canada...[H]e has done that...I asked him to review the [ASA] model that we had and to make necessary improvements, and he has done that.”

Dr. Rudd is a recognized expert in stock assessment modeling. As her report explains, the Department’s inability to implement Dr. Martell’s recommendations in the intervening 4 years significantly affects the reliability of ADF&G’s forecasts, on which the GHL is based. Let me stress that Sealaska does not fault the Department’s professionals for their inability to as yet implement the “necessary improvements” in the agency’s predictive modeling. We appreciate that budgetary and personnel challenges have hamstrung staff’s ability to do so. However, we do fervently ask that, until Department priorities allow staff to transition to the more reliable model structure, it recognize the limits and risks in the old ASA model and reduce the GHL accordingly.

Thank for the consideration that I know you will give Sealaska’s concerns.

Sincerely,

SIMPSON, TILLINGHAST, SHEEHAN and ARAUJO

/s/ Jon K. Tillinghast

Jon K. Tillinghast

cc: Dr. Sherri Dressel
sherri.dressel@alaska.gov



Attachment 4



Considering stock assessment uncertainty for the 2021 Sitka herring fishery guideline harvest limit

Dr. Merrill Rudd
Research scientist, Scaleability LLC
merrillrudd@gmail.com
1-201-207-0958

27 November 2020

Introduction

Sealaska Corporation has asked for my opinion on whether the Alaska Department of Fish and Game (ADF&G) should employ a precautionary guideline harvest level (GHL) until it is able to adopt and implement stock assessment modeling changes for the Sitka Sound herring population recommended by Dr. Steven Martell to ADF&G in December 2016.

Because of uncertainties in the forecast using ADF&G's existing age-structured analysis (ASA) model, the Department established a precautionary GHL for the Sitka sac roe fishery for 2013 (25% below ASA indications) and 2020 (39% below). It is my opinion that there are many additional uncertainties associated with the ASA model and forecast that would be improved when Dr. Martell's proposed changes are implemented. Therefore, ADF&G should continue to adopt a precautionary GHL at least until it is able to implement the proposed changes by Dr. Martell. The model structure proposed by Dr. Martell is currently being used by British Columbia to forecast its herring returns, and it would address many of the shortcomings that exist in ADF&G's existing model and forecast.

I came to this conclusion after reviewing documents related to the ASA model, forecast approach, setting the GHL, the technical report of Dr. Martell's proposed model changes, expert testimony, and a select number of scientific studies relating to herring roe fisheries. I am an independent scientist with a doctoral degree from the School of Aquatic and Fishery Sciences at the University of Washington with an extensive background in stock assessment modeling. My curriculum vitae is attached.

Areas of uncertainty that Dr. Martell's updates would address

Based on the 2020 forecast, ADF&G reduced the GHL by 39% compared with the level suggested based on the ASA model-predicted mature herring biomass, citing large uncertainty in the 2020 forecast related to the estimated number of age-3 fish and their probability of becoming mature age-4 herring the next year (ADF&G 2019). I think this decision and rationale are reasonable based on their discussion of survey estimates and exploration of model structural uncertainty (i.e. comparing different models to make sure their forecast of mature biomass is robust). However, it is a shortcoming of the forecast that estimates or quantification of uncertainty (e.g. confidence intervals or standard errors) are absent from the reported survey

observations (data inputs) and projected mature biomass.

My recommendation of a precautionary GHF until the model updates from Dr. Martell can be implemented is largely due to the fact that the ASA forecast model does not directly account for parameter or observation uncertainty. Dr. Martell recommended several important changes to the model that would address these shortcomings. These updates may improve the accuracy of predicting the coming year's herring returns, but more importantly, will better characterise uncertainty in the coming year's herring returns. Currently, the ASA model forecast reports a single value for the mature herring biomass. Due to the uncertain nature of ecological processes and population dynamics, this single value is most certainly wrong, so it is important to communicate uncertainty to understand how wrong that single value may be. With Dr. Martell's proposed changes, the forecast estimate of mature herring biomass is more reliable than those from the ASA model because it will come with transparent and thorough accounting of uncertainty (e.g. including probabilities of falling below threshold levels or meeting targets) so managers can better understand how wrong the average forecast estimate may be when choosing a harvest level.

The improvements that would be made by Dr. Martell's recommendations include:

1. Update to a statistical catch-at-age (SCA) model

A key update proposed by Dr. Martell is the change in model structure to a statistical catch-at-age (SCA) model from the more outdated virtual population analysis (VPA). In a VPA, population abundance and biomass are back-calculated from recent observations of catch, egg estimates, and other data inputs. Data inputs are generally assumed to be known without error. A drawback of a VPA when forecasting forward in time is that the stock assessment model must run twice. The first ASA model run estimates parameters through the final year of data. The second step is to re-fit the ASA model over many iterations (e.g. 1,000) where the parameter values are fixed at current estimates (or ideally, re-sampled from a distribution representing parameter uncertainty) and the model is re-fit to re-sampled data. The underlying SCA model included in Dr. Martell's proposed changes (and adopted for Pacific herring stocks in British Columbia, and generally more commonly used in stock assessments worldwide) uses a more straightforward and transparent approach to forecast population dynamics. SCA models estimate initial conditions of the population in the first year of the model and forward-calculate population abundance and biomass in order to fit to recent estimates of catch and other data. In this case, some observation error may be included in the data. Estimates of population parameters in the final model year can then be used to project forward one (or more) extra years without re-fitting the model to bootstrapped data. This approach better propagates estimation and recruitment uncertainty into the forecast. A comparison of the two approaches is discussed in more detail in Stewart and Martell (2015).

The update to an SCA model improves the characterisation of parameter uncertainty, observation (i.e. measurement) error, and random variation (i.e. process error), which have direct effects on the forecast.

2. Parameter uncertainty

From the documents I reviewed, it seems that the current ASA model does not include parameter uncertainty in the forecast. For example, the ASA model estimated the 2019 survival to be 0.67. The current methods would then assume survival is 0.67 for the forecast year. The forecast estimate of mature biomass is then predicated on a survival rate of 0.67, when in reality the true survival rate could be closer to 0.60 (as a hypothetical example). If uncertainty in the estimated value of 0.67 was included in the forecast, there would be a higher probability that the true mature biomass is represented by the forecast. This issue also applies to other key population parameters, such as average unfished recruitment (governing the size of the population), parameters of the maturity schedule (governing the proportion of the population mature in each age class), and gear selectivity (governing the proportion able to be harvested from the gear in each age class). While the estimated values used in the forecast do have the highest likelihood based on fits to the data, there are many confounding aspects of the model due to structural uncertainty, observation error, and process error that make it possible, even likely, that parameter estimates are not accurate. Using these single values in the forecast then propagates bias to the forecast estimate of mature biomass.

This issue is improved by including parameter uncertainty in the forecast, and updates from the proposed changes by Dr. Martell would make it much easier to do so. It is possible that bootstrapping methods are used in the ASA model forecast approach, where the ASA model would be re-fit over many iterations (e.g. 1,000) where the parameter values are re-sampled from a distribution and the model is re-fit to re-sampled data. However, this approach is not mentioned in the most recent ASA forecast report (ADF&G 2019), so I assume it is not used to account for parameter uncertainty in the forecast.

The use of informative prior distributions are a key update proposed by Dr. Martell that would improve the characterisation of parameter uncertainty in the forecast. Informative prior distributions for population parameters could be used to admit some uncertainty in previously fixed values in the stock assessment or provide additional information for estimation of the key population parameters. Allowing previously fixed (i.e. assumed) values to have some uncertainty often reduces confounding between model parameters (Martell 2016), allowing for more accurate estimates of key population parameters which will lead to more accurate forecasts. In a maximum likelihood context, using prior distributions (a key update in Dr. Martell's recommendations) are effectively a penalty on key population parameter estimates to help constrain estimated parameters to reasonable values, often aiding in model convergence. In the context of Bayesian inference, comparing the posterior and prior densities demonstrate how informative the data are about parameters.

The posterior distribution would also be used to directly account for parameter uncertainty in the model forecast, made much easier and more transparent by the SCA model proposed by Dr. Martell. This forecast approach would project the current parameter estimates one year forward, but instead of forecasting only the maximum likelihood estimate, would forecast each value from the posterior distribution one year forward. This would result in a distribution of forecast mature biomass rather than a single value. Managers could then consider the probability of the mature biomass dropping below the harvest threshold and better understand the uncertainty surrounding the median mature biomass estimate. With this proposed change by Dr. Martell, there would be less of a need for ADF&G to set a precautionary GHL because the uncertainty of the forecast

would be communicated to the managers directly.

3. Observation and process error

Dr. Martell's proposed changes include the ability to specify observation (i.e. measurement) error in data inputs. Observation error is difficult to include in a VPA model, such as the ASA. Discussion of observation uncertainty is missing or rare in the stock assessment survey documentation (Hebert 2019) and forecast (ADF&G 2019). It is mentioned that a bootstrapping approach is used to consider uncertainty in eggs spawned (ADF&G 2019), however it is unclear whether that uncertainty is propagated through to the forecast. The use of a single estimate of eggs spawned propagates bias in a similar way to parameter uncertainty; the average estimated number of eggs spawned is likely to be wrong due to uncertainty in ecological processes and measurement error in cumulative spawning mileage, spawn area, and egg density. Where it is possible to use bootstrap procedures to estimate standard error in the data, inter-annual variation in observation error can be specified using Dr. Martell's model changes. This observation uncertainty would then be propagated forward in the forecast so that a distribution of possible number of eggs would be considered, increasing the probability that the true number of eggs is included in the forecast. Changes relating to observation error on datasets have been adopted for British Columbia stocks and improved their estimation of the variance structure (DFO 2018).

Furthermore, it is unclear whether the ASA model forecast is including process error. Process error is essentially random variation in the environment or other types of variation not accounted for by uncertainty in population parameters or data inputs. Process error is included in Dr. Martell's proposed changes to the model through recruitment variability. Where parameter and observation uncertainty are propagated forward in the projection model using the proposed updates described above, uncertainty in next year's recruitment could also be propagated forward. The number of projected recruits would be randomly drawn from a distribution where the mean is equal to the average number of recruits predicted by the stock-recruit function and standard deviation either estimated or assumed to be a specific, reasonable value.

Conclusions

My recommendation is that ADF&G should take a precautionary approach to setting the GHL until Dr. Martell's proposed model changes can be adopted. The current ASA forecast does not adequately characterise uncertainty, meaning that the forecast estimates are communicated as being known essentially without error associated with uncertainties in estimated parameters, observations, and random variability. While some types of parameter uncertainty are discussed in ADF&G forecast reports, these values are not well quantified in the reports via confidence intervals or standard errors in the forecast mature herring biomass and many types of uncertainties are missing from their considerations. This means that it falls to ADF&G to interpret how uncertain they think the estimates of mature herring biomass may be, requiring a precautionary approach to setting the GHL. While some of the updates proposed by Dr. Martell could lead to better accuracy in forecast predictions, the most important update is the ability to characterise uncertainty and communicate that uncertainty to managers. For example, the updated herring forecast using proposed model changes would output a posterior distribution of mature herring biomass, which can be used to directly interpret the probability of mature herring



biomass falling below the harvest threshold. When uncertainty is better characterised and transparently communicated through Dr. Martell's proposed model changes, the forecast may be taken at face-value and interpreted by managers without the need for ADF&G to take precautionary measures when setting the GHL.

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- Stewart, I.J. and Martell, S.J.D. 2015. Reconciling stock assessment paradigms to better inform fisheries management. ICES Journal of Marine Science. 72(8): 2187-2196.



Attachment 5



From: [Dressel, Sherri C \(DFG\)](#)
To: [Bangs, Peter D \(DFG\)](#)
Subject: FW: Sealaska Corporation Request to Adopt Precautionary GHF for Sitka Sac Roe Fishery
Date: Thursday, February 25, 2021 12:26:58 PM

From: Dressel, Sherri C (DFG)
Sent: Monday, December 14, 2020 10:56 AM
To: Bowers, Forrest R (DFG) <forrest.bowers@alaska.gov>
Subject: RE: Sealaska Corporation Request to Adopt Precautionary GHF for Sitka Sac Roe Fishery

Thanks Forrest –
Sherri

From: Bowers, Forrest R (DFG) <forrest.bowers@alaska.gov>
Sent: Monday, December 14, 2020 10:55 AM
To: Dressel, Sherri C (DFG) <sherri.dressel@alaska.gov>; Dupuis, Aaron W (DFG) <aaron.dupuis@alaska.gov>
Cc: Thynes, Troy S (DFG) <troy.thynes@alaska.gov>; Hebert, Kyle P (DFG) <kyle.hebert@alaska.gov>; Miller, Sara E (DFG) <sara.miller@alaska.gov>
Subject: RE: Sealaska Corporation Request to Adopt Precautionary GHF for Sitka Sac Roe Fishery

Sam and I chatted about this and decided no response is needed to this request.

Thanks.

Forrest

From: Dressel, Sherri C (DFG) <sherri.dressel@alaska.gov>
Sent: Monday, December 14, 2020 10:53 AM
To: Bowers, Forrest R (DFG) <forrest.bowers@alaska.gov>; Dupuis, Aaron W (DFG) <aaron.dupuis@alaska.gov>
Cc: Thynes, Troy S (DFG) <troy.thynes@alaska.gov>; Hebert, Kyle P (DFG) <kyle.hebert@alaska.gov>; Miller, Sara E (DFG) <sara.miller@alaska.gov>
Subject: FW: Sealaska Corporation Request to Adopt Precautionary GHF for Sitka Sac Roe Fishery

Ugh, sorry Bo and Aaron. I thought I had forwarded this to you as well. This is the communication I was referring to.

From: Dressel, Sherri C (DFG)
Sent: Monday, November 30, 2020 3:37 PM
To: Hebert, Kyle P (DFG) <kyle.hebert@alaska.gov>; Miller, Sara E (DFG) <sara.miller@alaska.gov>
Subject: FW: Sealaska Corporation Request to Adopt Precautionary GHF for Sitka Sac Roe Fishery

fyi



PC318
45 of 45

From: Jon K. Tillinghast <jon@stsl.com>

Sent: Monday, November 30, 2020 1:42 PM

To: Rabung, Samuel H (DFG) <samuel.rabung@alaska.gov>; Fair, Lowell F (DFG) <lowell.fair@alaska.gov>; Thynes, Troy S (DFG) <troy.thynes@alaska.gov>

Cc: Dressel, Sherri C (DFG) <sherri.dressel@alaska.gov>

Subject: Sealaska Corporation Request to Adopt Precautionary GHL for Sitka Sac Roe Fishery

Dear Mssrs. Rabung, Fair and Thynes:

Please find enclosed:

- (i) Sealaska Corporation's request that ADF&G establish a precautionary guideline harvest level for the Sitka Sound herring sac roe fishery until it is able to implement the new stock assessment model recommended to the Department by Dr. Steven Martell in December, 2016;
- (ii) The report of Dr. Merrill Rudd describing the forecasting uncertainties perpetuated by the Department's inability to implement Dr. Martell's recommendations; and
- (iii) Dr. Rudd's *curriculum vitae*.

Thank you for the consideration that I know you will give to Sealaska's request.

Jon K. Tillinghast
Simpson, Tillinghast, Sheehan & Araujo, P.C.
One Sealaska Plaza, Suite 300
Juneau, Alaska 99801
(907) 321-3405 (cell)
(907) 586-3065 (fax)
Email: jon@stsl.com

Submitted By
Serena
Submitted On
11/16/2021 6:33:45 PM
Affiliation



PC319
1 of 1

I am a student researcher that travels to Alaska to look at food insecurity. Herrings are essential for the Tlingit culture as well as the economy. I support proposals 156, 157, & 158. I oppose proposals 159,160,161,163,164,165. Thank you.

Submitted By
Seth Bone
Submitted On
12/22/2021 3:38:32 PM
Affiliation



PC320
1 of 1

Phone
9077476136
Email
sethbone@yahoo.com
Address
PO Box 1781
Sitka, Alaska 99835

Re: King salmon management proposal 83

Chair Carlson-Van Dort and members of the Board,

I'm a lifelong Alaska resident, and have operated a fishing charter lodge in Sitka for the past twenty six years. Our company provides a full season of bookings to sixteen local charter boat owner/operators, and employs several dozen people seasonally, along with a handful of year around employees. King salmon are one of just a few species that really attract anglers to Alaska, and are critically important to our ability to market trips and keep our local operators busy each season.

I support proposal 83, because it's a fair proposal that prioritizes resident angler access, provides conservative but stable opportunity for guided operations, and aims to maintain the historical allocation split between troll and sport averaged over time.

Proposal 83 aims to return sport king salmon management to the way it was managed from the late 1990's through 2018, before the latest Pacific Salmon Treaty annex. For decades, the sport fishery was managed to target 20% of Alaska's share of wild chinook harvest ON AVERAGE over time, because this was the most effective and workable way to manage a sport fishery. Indeed, objective 1 of the current management plan still states "manage the sport fishery to attain an average harvest of 20 percent...". However, since the latest treaty annex, the department has started managing the sport fishery to an EXACT NUMBER of chinook each year.

Managing a sport fishery to an exact number of fish leads to in-season closures some years, then sudden and unexpected liberalizing of bag limits in others. For those of us marketing fishing trips to prospective clients months in advance of the season, such unpredictability is very damaging. It's also unnecessary.

Prop 83 proposes a structured management plan, similar to the one used prior to 2019, which protects resident access at all levels of abundance. It also specifies lower and very conservative limits for non-resident anglers at all abundance tiers, even when abundance is high. In lower abundance years, sport harvest may surpass 20% by a modest amount, and in high abundance years, the sport harvest would undershoot the 20% target. The troll fleet, which is better equipped to target a specific number of fish with precision, would realize an average harvest of 80% over time, with small variations year to year.

The goal and probable result of adopting this plan, based on historical data provided by ADF&G, is to keep the sport fishery's harvest near its historical share over time, while protecting resident access and maximizing the value of Alaska's king salmon resource. I encourage the board to adopt a management approach similar to the one envisioned by proposal 83.

Thank you,

Seth Bone

Submitted By
Shawaan Jackson-Gamble
Submitted On
12/22/2021 9:30:22 PM
Affiliation
Lingit



PC321
1 of 2

Phone
9075180869
Email
sjacksongamble@gmail.com
Address
529 Gunnuck Ave
Kake , Alaska 99830

Gunalcheesh Alaska Board of Fish for accepting my public comment and I hope to give my public comment in person next month. I am writing this comment so that my future kids, grandchildren and next generations can have sustainable access to harvest herring eggs. I grew up harvesting herring eggs with my father Tom Gamble and in my 24 years of being on this earth I have seen a tremendous decline in not only the herring abundance in Sitka sound but the quality and amount of herring eggs we are blessed with each year. Nearly all of Southeast gets a taste of Sitka Herring eggs each year and is something that has been traded among our villages for time immemorial, Southeast Communities historically had herring spawns each year until it was over harvested from commercial herring fishing. Recently the State of Alaska lost the first round of litigation against Sitka Tribe of Alaska making sure that subsistence needs are met and in my eyes the State of Alaska prioritizes making money over subsistence, but you can't eat money. Once the herring are over fished you will see a direct correlation with the entire ecosystem because herring are a forage fish and a keystone species for everything including salmon, seal, sea lions, sea otters, humans, most birds, whales and the list goes on. My father's people the Kiks.adi have been in Sitka for over 10,000 years and have stories and songs that validate our ties to Sheetka Kwaan (Sitka).

I am writing today in support of proposals 156, 157, and 158.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

Proposal 156 should be supported because fishing pressure on herring has never been higher than it is right now and the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance.

Proposal 157 and 158 should be supported because of the growing consensus of the vast importance of older fish for population resilience. The Sitka Sound Sac Roe herring fishery is designed to select for older herring and the population age structure is precarious and vulnerable as a result. These proposals would avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population.

Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.

Proposal 159, 160, and 161 are offensive, baseless, bad faith proposals brought by an industry gear group (called "Southeast Herring Conservation Alliance") against indigenous people. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

If I am required to get a permit to harvest herring eggs like proposal 161 proposes than I propose that everyone that goes to church gets a permit to go to church. The State of Alaska might as well make me fill out a permit to traditional dance and sing our songs. Proposal 161 is a direct attack on subsistence users brought forward by the commercial fishing industry and Alaska should not create more barriers to a sustainable cultural and subsistence practice. It is also going against the American Indian Religious Freedoms Act of 1978 which protects

the rights of Native Americans to exercise their traditional regions by ensuring access to sites, use and possession the freedom to worship through ceremonials and traditional rites. It also goes against ANILCA Title VII which mandates that Alaska be given a priority for subsistence uses of fish and wildlife.



I am opposed to Proposal 163 and 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed out fish in the water while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they purport to address.

I am opposed to both Proposal 165 and Proposal 166, which should not even be considered, given that they represent permit creep of a sort that has no precedent and has been discouraged by the CFEC in recent years. I am opposed to both of these measures to expand the scope of the G01A (Herring Roe, Purse Seine, Southeast) permits.

Proposals 159, 160, 161, 163, 164, and 165, and 166 lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Still, I believe that none of these proposals goes far enough to advance respectful stewardship and protect wild abundance for generations to come. Please listen to what the original stewards of these lands and waters have to say, we have been advocating for protection of herring for how many decades now. Think about how this will affect the next generations and the entire ecosystem.

Submitted By
Sherri Blankenship
Submitted On
12/22/2021 8:55:43 PM
Affiliation
Self



PC322
1 of 1

Phone
9078307677
Email
sherri@elementbodysystems.com
Address
4120 Halibut point road
Sitka , Alaska 99835

Dear Madam chair and Board of Fisheries members,

I am in opposition of proposals 156,157 and 158.

As a Sitka resident, I see no biological reason to change the management plan for the Sitka Sound herring stock. These proposals look to change the management of the herring stock until it becomes no longer viable for commercial harvest. Commercial harvest of herring stock supports my household and the households of the crewmen and women that work in the industry. My children are STA members and the economic health of their future depends on commercial fishing. Commercial harvest benefits several boats within our extended family.

Respectfully,

Sherri Blankenship

Submitted By
Shireen Nickel
Submitted On
12/16/2021 12:56:15 PM
Affiliation



PC323
1 of 1

Phone
408-888-8821
Email
shireenann@icloud.com
Address
342 E Lake St.
Weed , California 96094

To whom it may concern, I'm writing to urge you to support herring Proposals 156, 157 and 158! Please oppose Proposals 159, 160, 161, 163, 164, 165, & 166. The health and sustainability of Sitka Sound is pivotal on so many levels! Your decision must address the well-being of The indigenous peoples that have been caretakers of the Sitka Sound long before your participation. Under their stewardship this area has thrived! I would encourage you to try to achieve something close to that and you're on the right track. Thanks for reading my comments! Most Sincerely, Mrs. Shireen Nickel

Submitted By
Sidney
Submitted On
12/22/2021 4:30:45 PM
Affiliation
Permit Holder/Tribal Citizen



PC324
1 of 1

Chairman and members of Board of Fish,

My name is Sidney Kinney, I am an Alaska Native and third generation commercial fisherman as well as a Sitka Tribe citizen. I reside in Sitka, born and raised; own a small business and am a permit hold in the Sitka Sound Sac Roe fishery, Chatham Sablefish, and Northern Southeast Roe on Kelp.

My Dad participated in the first Roe on Kelp harvest in the 60's and my stepdad has been fishing Sitka Sac Roe for over 42 years. I started out corking when I was 14 and from there crewing at 16 and have been hands on ever since. Acquiring my permit at 24, I now fish Sitka Sac Roe with my husband aboard our fishing vessel. Commercial fishing is in my blood, it's a way of life and that of my families. It's not just a way to make ends meet, it's engrained in us. We have three daughters of our own now and very much plan on putting them on the back deck when the time comes. Teaching them about sustainability, about our way of life both on and off the boat. Teaching them the importance of being good stewards of the ocean and land. About our native heritage and way of life and that everything is linked and we must show respect for everyones feelings.

I do not support proposals 156,157,158

I do support proposals – 159, 160, 162,163,164

I believe in science based and data driven fisheries. The Sitka Sound herring stock is at an all-time high well exceeding 100 nautical miles of spawn in 2021.

Over the past 40 years Alaska Department of Fish & Game has observed, recorded, and analyzed this fishery more than any other stock in the state of Alaska and I'm thankful that my community and family have been able to benefit from this over the decades. We need to continue supporting their efforts and work in managing this resource for not only subsistence, but commercial harvesters as well.

Thank you for your time,

Sidney Kinney



December 22, 2021

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Comments on Southeast BOF Proposals

Dear Alaska Board of Fisheries Members:

Silver Bay Seafoods is a fisherman-owned, Alaska seafood processing company founded by local fishermen in Sitka in 2007. We operate six processing facilities in coastal Alaska communities which provide a competitive market to our fishermen owners, critical economic benefits to our community partners, and hundreds of Alaska seafood processing jobs. Our Southeast facilities in Sitka and Craig support independent harvesters participating in Southeast salmon and herring purse seine fisheries. We offer the following comments on proposals under consideration by the Alaska Board of Fisheries at your January 2022 regulatory meeting.

Silver Bay Seafoods Opposes Proposals 101, 103, 156, 157, and 158

Proposals 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.

The Alaska Salmon Hatchery Program has set an extremely high bar for conservative and sustainable management of salmon enhancement in Alaska. Protection of wild salmon stocks has been at the forefront of the program since inception. Wild and hatchery stocks are producing salmon returns that offer critical food and economic opportunities for remote Alaska communities that need it most. The Alaska Hatchery Program is an effective and celebrated success. There is no scientific evidence of harm to wild Alaska stocks. To be certain, ADF&G and industry leaders have funded a comprehensive, multi-year research project to collect additional, targeted information about the relationship between hatchery and wild salmon stocks in Alaska. This project is ongoing, but in the meantime and since inception, Alaska has adhered to strong, conservative policies for sustainable management of our wild and enhanced salmon stocks.

Enacting overly burdensome policies or regulations (such as those outlined in proposals 101 and 103) without supporting scientific data would be extremely harmful to Alaskans.



Very similar proposals were considered and unanimously rejected by the Board at a recent regulatory meeting in Cordova. We appreciate the board's comments during deliberations at this meeting and ask that you to continue to reject the unsubstantiated rhetoric and attacks on Alaska's hatchery program.

PROPOSALS 156 - 158 – 5 AAC 27.160. Quotas and guideline harvest levels for Southeastern Alaska Area. As indicated by ADF&G in their staff comments on these proposals, the current harvest rate strategy is based on the best scientific information available and contains conservation provisions that are beneficial to herring populations and the ecosystem. This current strategy has been time-tested and is a great example of Alaska's commitment to sustainable fisheries management.

Thank you for the opportunity to comment.

Respectfully,

Abby Fredrick
Director of Communications

Submitted By
Simon Jacobi
Submitted On
12/22/2021 8:56:44 AM
Affiliation



PC326
1 of 1

My name is Simon Jacobi, I have been guiding for the last 24 seasons in Sitka ,Ak. Much had changed in that time. I'm in support of proposal 83 because we as guides need a more stable management plan which allows for less in season king salmon closures. Charter being lumped into the same category as sport and now the unguided charter sectors growth doesn't seem to be working and causing in season closures for all. In recent years patterns and ocean conditions have "seemed" to have changed pushing runs later into the season in which we are closed. I know this proposal has nothing to do with limited entry but it seems like the charter fleet is getting punished for being lumped into the rapid progression in access for locals and the unguided growth! King salmon management is very important for all fisheries. Thank you for your time.

Submitted By
Andrew Thoms, Executive Director
Submitted On
12/22/2021 2:44:45 PM
Affiliation
Sitka Conservation Society



PC327
1 of 2

Phone
907-747-7509
Email
andrew@sitkawild.org
Address
201 Lincoln Street Room #4
Sitka, Alaska 99835

Support: 80, 85, 86, 156, 157, 158

Oppose: 159, 160, 161, 164, 165

The Sitka Conservation Society is the oldest conservation organization in Alaska and was founded in 1967. Our grassroots work is based in Sitka, Alaska on the west coast of Baranof Island, where we are completely surrounded by the Tongass National Forest. Our mission is to protect the natural environment of the Tongass National Forest while developing ecologically, socially, and economically sustainable communities within Southeast Alaska. We work collaboratively with local community members, tribal governments, municipalities, Alaska Native corporations, the private sector, and non-profit organizations from rural communities throughout the region to create on-the-ground solutions for rural development that utilize our natural setting and resource-rich surroundings in a resilient and sustainable manner.

Sitka Conservation Society recognizes the social, ecological and economic importance of the species up for discussion at the 2022 Southeast and Yakutat Finfish and Shellfish meeting and knows that the Board's work in January will have lasting impacts for communities on the Tongass. Given our organizational scope, we offer the following comments on salmon, herring, climate change and ADFG resources for your consideration.

SALMON

Salmon are the lifeblood of the Tongass National Forest. The Tongass boasts over 15,000 miles of salmon rivers and streams and over 123,000 acres of lakes and ponds that support salmon. Salmon are a treasured food source in Southeast Alaska. Across rural Southeast Alaska, residents use an average of 75 pounds of salmon per person each year. Nearly 90% of rural households here use salmon. For Southeast Alaskans, salmon represent more than food: they represent a way of life that is tied to the land. This is true for none more than the Indigenous peoples of the region, the Lingít, the Haida, and the Tsimshian, who have stewarded salmon runs since time immemorial. Salmon are a traditional food that supports cultural renewal. Salmon are invaluable here, and they deserve utmost protection.

The community of Sitka is very concerned about the impacts of climate change on our community and our state. Specifically, we have concerns for our sport, commercial, and subsistence fisheries because of how ocean acidification and warming water temperatures will affect the ocean ecosystems. At the 2018 Board of Fisheries meeting in Sitka, the Alaska Department of Fish and Game repeatedly stated that the dire situation that they were seeing in king salmon returns was because of ocean productivity and ocean conditions.

Given the importance of the salmon, the growing consequences of climate change, and the concerning trends that we have seen in Southeast in recent years, we urge the Board of Fisheries to continue supporting conservative management of salmon species and to support equitable and sustainable access to salmon for cultural, subsistence, commercial and recreational use within the region.

In particular, we support Proposal #80, which allows for discussion of how to most appropriately assign harvest ceiling overages in consideration of the fishery or fisheries that exceeded annual allocation, Proposal #85, which would amend the Southeast Alaska King Salmon Management Plan to expand the Department's ability to manage for a resident priority in the instance that the king salmon sport allocation is going to be exceeded, and Proposal #86, which would amend the Southeast Alaska King Salmon Management Plan to manage for a resident priority by providing avenues to adjust nonresident seasons and bag limits to avoid closures for residents. These proposals were all supported by the Sitka ADFG Advisory Committee, and each attempts to provide more tools to achieve balanced and thoughtful management of salmon. Proposals 85 and 86 offer tools to protect resident sport fishing access, the sport fishery being very important for Southeast households to meet their subsistence needs.

HERRING

The herring are a keystone species; a critical part of the ecosystem, sustaining the diverse forms of life, from salmon to whales to birds, that make the Tongass and its surrounding waters globally remarkable and that support our regional economy. Sustainably harvested herring eggs have been a staple food for the Lingít people since time immemorial, feeding people all up and down the coast and into the interior. The herring are invaluable and irreplaceable to the Lingít culture.

Sitka is home to the only remaining commercial sac-roe herring fishery in Southeast Alaska, following the collapse or closure of several other fisheries in the region in recent decades. There is still uncertainty on the cause of some of these collapses, and none of those fisheries have recovered; a devastating outcome, especially given the broader context of a global decline in herring. When a species

population shrinks, it is reasonable to expect that it may become more vulnerable, due to possible losses in protective diversity, geographic diversity, age structures, etc. and increased harvest pressure on the remaining fish.



The economic sustainability of the current sac-roe fishery concerns us, given the high percentage of biomass by weight of the targeted product, the roe, and that is used for non-human consumption. Similar to how the remaining old growth trees on the Tongass generally have the most value when left standing to support the broader ecosystem and connected social and economic activities, we believe that the remaining herring are most impactful for our communities when they are left in the water versus being processed into fish meal.

Climate change, as previously spoken to, is a growing concern that increases uncertainty in all fisheries management, including herring management.

In short, the Sitka Sound herring population, as a last stronghold for herring eggs in the region, is under enormous pressure to continue meeting social, ecological and economic needs for Sitka and communities across Alaska. The stakes for management decisions for this species are very high, and there is not a clear path for recovery if missteps are made.

It is for these reasons that the Sitka Conservation Society supports conservation of the herring. We ask the Board of Fisheries to do everything in their power to ensure the health and abundance of the herring population for future generations.

Given the specific proposals available to comment on this meeting cycle, Sitka Conservation Society supports proposals 156, 157 and 158 submitted by the Sitka Tribe of Alaska, which intend to make stock management more conservative and to provide new protections for older fish. If the Board of Fisheries has alternative or additional conservative measures they would be interested in applying, we would be happy to hear this discussion.

We oppose proposals 159, 160 and 161 which are unnecessary and would hurt access or create more barriers to the subsistence harvest of eggs on branches, a sustainable practice that has been practiced for thousands of years. We also oppose proposals 164 and 165, which based on our reading, risk increasing the commercial pressure on the herring.

CLIMATE CHANGE

We ask the Board of Fisheries to take proactive steps to account for climate change in all fisheries management decisions made by the Alaska Department of Fish and Game.

ADFG RESOURCES

Lastly, we would request that the BOF make specific recommendations and requests to the State of Alaska legislature and governor's office to ensure that the department has the necessary resources to manage and invest in our fish and game resources in the State. A number of Advisory Committees across the state have made specific requests for resources-- including the Sitka AC, which is sending a letter to the governor and Sitka's representatives requesting funding for Southeast region herring management to do a major survey to acquire a current population estimate of unfished biomass of herring (not updated since 1998) and a revaluation of the whole overall "Herring harvest strategy" among other needs, and another requesting support for improved Brown Bear management on Baranof Island. In each of these Sitka cases, resource managers are using outdated data, are making decisions with a clear lack of data, and are lacking the capacity to do the work that is needed to effectively manage these important resources.

Thank you for your public service and for your consideration of these comments.

Submitted By
Gerry Hope
Submitted On
12/22/2021 8:03:38 PM
Affiliation
Sitka T&H Community Council



PC328
1 of 2

Phone
9077383377
Email
ghopeone@gmail.com
Address
Comment on Herring Proposals
Sitka, Alaska 99835

Sitka Tlingit & Haida Community Council

(mailing address here)

Sitka, Alaska 99835

December 22, 2021

Alaska Board of Fisheries

Board Support

P.O. Box 115526

Juneau, Alaska 99811-5526

RE: Comment for Board of Fisheries meeting scheduled in Ketchikan, AK on January 4 – 15, 2022

Dear Members of the Board,

The Sitka Tlingit & Haida Community Council (T&H Community Council) *strongly supports Proposal 156*.

In support of Proposal 156, this proposal is an effort to ensure a reasonable opportunity for subsistence harvesters, while also works to ensure sustainability for the vital resource for the future.

However, Sitka T&H Community Council *strongly opposes Proposals 159, 160, 161 and 165*.

In opposition to Proposals 159 and 160, 159 would repeal 5 AAC 27.195. 5 AAC 27.195 was adopted in order to distribute the commercial fishery by time and area in the Sitka Sound, and to consider the quantity and quality of herring spawn on branches when making management decisions that impact both the commercial fishery and subsistence harvesters. 5 AAC 27.195 is critically important and must not be repealed. Proposal 160 would repeal part of the closed areas to commercial fisheries, which would eliminate 6.1 square miles of protected area which would take away a very important area that provides a reasonable opportunity for subsistence harvesters for traditional use of herring eggs. In opposition to Proposal 161, which would require subsistence harvesters to get permits – this is offensive and simply not necessary. In opposition to Proposal 165, which would allow the unharvested sac roe quota to be harvested to a food and bait fishery, furthering the negative impact to both and herring subsistence harvesters to have a reasonable opportunity, and to the herring as a sustainable resource.

The Sitka T&H Community Council implores you to Support Proposal 156, and Oppose Proposals 159, 160, 161 and 165.

If you have any questions please feel free to contact me via email; pata6088@gmail.com

We wish you a safe and Happy Holidays, thank you for taking public comment.

Gerry Hope, Vice President

Sitka T&H Community Council



Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



PC329
1 of 39

December 22, 2021

Alaska Board of Fisheries
Board Support
P.O. Box 115526
Juneau, AK 99811-5526

Members of the Board of Fisheries:

The Sitka Tribe of Alaska (STA) is a federally recognized tribal government for over 4,000 tribal citizens located in Sitka, Alaska. STA is responsible for preserving the health, welfare, safety, and culture of its citizens. STA submits the following comments on proposals for the Board's 2022 Southeast/Yakutat Finfish and Shellfish meeting.

EXECUTIVE SUMMARY

- STA strongly **SUPPORTS Proposal 156**
- STA strongly **OPPOSES Proposals 159, 160, 161, and 165**

STA strongly supports Proposal 156, which would make the Sitka Sound herring harvest control rule more conservative to address unmet subsistence needs and scientific uncertainties in the Alaska Department of Fish & Game's (ADF&G) biological modeling. Proposal 156 would reduce the commercial sac roe fishery harvest rate in years when the forecasted spawning biomass is less than 120,000 tons. Under the current harvest control rule, the commercial fishery is allowed to harvest up to 20% of the forecasted biomass when the returning biomass exceeds 45,000 tons, or 1.8 times the harvest threshold—a uniquely aggressive management approach in Southeast Alaska. Proposal 156 would implement a modest change, resulting in a slight reduction in the commercial harvest rate when the biomass is less than 120,000 tons, which occurs in most



years. But there would be no change to the harvest rate in years when the biomass exceeds 120,000 tons, such as in 2020 and 2021.

Proposal 156 is necessary to ensure a reasonable opportunity for subsistence harvesters. The Board considers the harvest control rule to be an important way of meeting its legal obligation to ensure a reasonable opportunity for subsistence. The existing regulations do not meet that standard. The low range of the amount necessary for subsistence (“ANS”) has been met only once in the last 10 years and only 7 times in the last 20 years (2002, 2003, 2004, 2009, 2010, and 2014). Particularly in years when the biomass is less than 120,000 tons, subsistence harvesters have been unable to meet their needs due to the disruption to spawning and aggressive harvest by the commercial fishery. A more conservative harvest control rule is necessary to ensure that subsistence harvesters have a reasonable opportunity to meet their needs.

STA also strongly opposes Proposals 159 and 160. Proposal 159 would repeal 5 AAC 27.195—a regulation adopted by the Board in 2002 based on a compromise among STA, ADF&G, and the commercial fishing industry. There is no conceivable justification for repealing this important regulation. The Board adopted 5 AAC 27.195 to ensure a reasonable opportunity for subsistence by requiring ADF&G to distribute the commercial fishery by time and area throughout Sitka Sound, and to consider the quality and quantity of herring spawn on branches when making management decisions regarding the commercial and subsistence fisheries. STA defended that regulation in court, and the superior court agreed with STA that ADF&G had unlawfully interpreted and implemented 5 AAC 27.195 prior to the 2021 season.

Similarly, Proposal 160 would unjustifiably repeal part of the “closed areas” in Sitka Sound that the Board created to ensure a reasonable opportunity for subsistence. Proposal 160 would eliminate the additional 6.1 square miles of closed areas that the Board adopted in 2018 to provide additional protections for subsistence harvests in critical locations near Sitka. The area in question is home to some of the most important and productive subsistence harvest sites, according to data from ADF&G. There is no conceivable justification for repealing this important protection for subsistence harvesters.



STA strongly opposes Proposal 161, which would require permits for the subsistence harvest of herring spawn on branches. Permits are an unnecessary and culturally inappropriate barrier to subsistence harvests. Currently, ADF&G conducts annual subsistence harvest surveys in conjunction with STA. ADF&G has stated that the ongoing surveys provide accurate, reliable information regarding the harvest, including important qualitative information about the quality of the harvest. If the Board adopted the permit requirement in Proposal 161, ADF&G would receive less data and information than it does currently. The permit requirement would also likely to lead to decreased participation from traditional harvesters who are take pride in the self-regulated customs and traditions of the herring spawn fishery.

Finally, STA strongly opposes Proposal 165, which would allow unharvested sac roe quota to be harvested in a food and bait fishery. There is no need to start another consumptive herring fishery when subsistence harvesters are unable to meet their needs.

INTRODUCTION

Herring (*yaaw*) are a culturally and ecologically important fish in Southeast Alaska. Herring have been an integral part of Alaska Native culture in Southeast Alaska for thousands of years (Thornton et al. 2010; Moss et al. 2016; Thornton and Moss 2021). Herring eggs are a celebrated traditional food; they are often shared as gifts across Alaska and eaten at gatherings such as potlatches (Schroeder and Kookesh 1990; Thornton 2019).

Sitka Sound is the last herring population in Alaska that consistently provides a subsistence herring egg harvest and is the primary source of all subsistence herring eggs eaten in Alaska. Other Southeast Alaskan herring populations have been mismanaged and/or overfished to the point where they are severely depressed or extirpated and are unable to provide a reliable subsistence harvest (Thornton et al. 2010). Thus, Sitka Sound is the primary location in Alaska where subsistence users can gather herring roe. The subsistence harvest of Sitka herring eggs must be protected to prevent the loss of a vital part of Alaska Native culture.



Herring are also the lynchpin of Southeast Alaska's marine ecosystem, transferring energy to other culturally, ecologically, and economically important species. Herring constitute 60% of the biomass of a king salmon's diet (Fresh et al. 1981). Herring are also important prey for Coho salmon and halibut, accounting 58% and 53% of their diets, respectively (Environment Canada 1998). STA's positions on Board proposals are rooted in preserving Native culture and marine ecosystems, which are critical to both subsistence users and commercial fishermen.

The Board must address the fact that subsistence harvesters' needs are not being met. According to ADF&G's data, the low range of ANS has only been met once in the last 10 years (Sill and Lemon 2020). Traditional ecological knowledge describes a large contraction in herring spawn, including the acreage and duration of herring spawn, over the last several decades (Gmelch and Gmelch 1985; Thornton et al. 2010). Spawning events are shorter, less predictable, and rarely last the three consecutive days of spawn in suitable habitat elders say is necessary for good quality spawn (Thornton et al. 2010).

STA urges the Board to listen to traditional knowledge holders and protect Sitka Sound herring. As a general rule, the Board should apply the Precautionary Principle to all of its decisions. The Precautionary Principle directs that when there are doubts or uncertainties about management approaches, the Board should err on the side of conservation and caution. Restrictions on the commercial fishery can be loosened in the future as more information resolves current uncertainties. But the harms caused by overfishing and mismanagement may take generations to undo.

STA COMMENTS ON HERRING PROPOSALS

Proposal 156: Modify the harvest control rule for pre-season forecasts less than 120,000 tons.

STA strongly supports Proposal 156, which would modify Sitka herring management to slightly lower the commercial harvest rate in seasons when the forecasted biomass is less than 120,000 tons. Proposal 156 would improve subsistence harvesters' opportunity to harvest the amount of herring spawn necessary for subsistence uses each year. Proposal 156 would be a more

conservative approach than the current harvest control rule (“HCR”), which is important because ADF&G has acknowledged that there are significant scientific uncertainties in the current biological models that it uses to forecast the returning spawning biomass and the threshold amount, which is the minimum returning biomass required to open the commercial fishery.

Proposal 156 would amend the current harvest control rule provided in 5 AAC 27.160(g). The current harvest control rule authorizes a commercial fishery when the forecasted herring biomass exceeds the threshold of 25,000 tons. The commercial harvest rate is adjusted according to sliding scale between 12 and 20% based on the forecasted biomass. Under the current formula, when the forecasted biomass exceeds 45,000 tons, the commercial fishery is allowed to harvest at the maximum rate of 20%. 5 AAC 27.160(g) provides:

$$\text{Percent Harvest Rate} = 2 + 8 * \left[\frac{\text{Forecast Spawning Population Size}}{20,000} \right]$$

Proposal 156 would decrease the commercial harvest rate to require the forecasted biomass to exceed 120,000 tons before the maximum rate of 20% is reached. The low end of the sliding scale harvest rate would be decreased from 12% to 10.5%, but the threshold would remain the same (25,000 tons). The new formula under Proposal 156 would provide:

$$\text{Percent Harvest Rate} = 8 + 2 * \left[\frac{\text{Forecast Spawning Population Size}}{20,000} \right]$$

Proposal 156 is a compromise between the current, aggressive Sitka Sound harvest rule and the more conservative harvest control rule that applies to the rest of southeast Alaska (the “SEAK HCR”). (Dupuis, 2021 at 4). For comparison, if the SEAK HCR were applied in Sitka, the maximum rate of 20% would not be reached until the forecasted biomass exceeds 150,000 tons. Figure 1, *below*, demonstrates the allowable harvest rates based on forecasted biomasses under Proposal 156 compared to the existing Sitka HCR and the SEAK HCR.

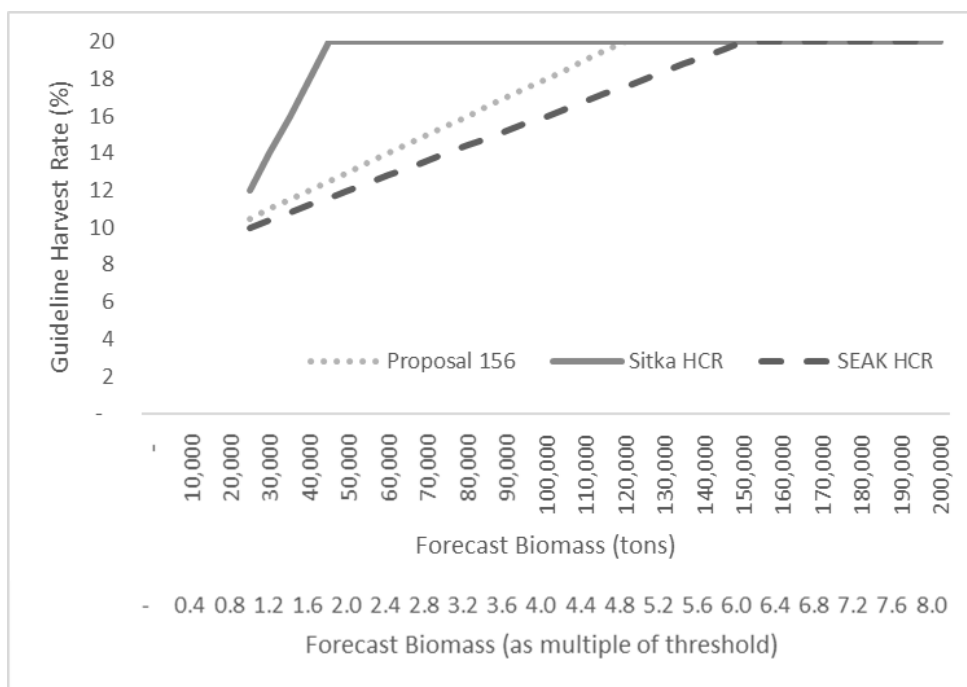


Figure 1. Guideline harvest rates under Proposal 156, the existing Sitka HCR, and SEAK HCR.

- Proposal 156 Is Necessary to Ensure a Reasonable Opportunity for Subsistence Users and Address Subsistence Harvesters' Unmet Needs.**

The Board has always considered the harvest control rule to be an important way of ensuring a reasonable opportunity for subsistence. In 1998, the Board adopted the first version of the Sitka harvest control rule, which established the sliding scale harvest rate with a threshold of 20,000 tons—the amount biologically required to sustain the population. The Board specifically increased the threshold to 20,000 tons—above ADF&G's recommended amount of 16,800 tons—to ensure a reasonable opportunity for subsistence harvesters. According to ADF&G, “[s]etting the threshold in regulation at levels beyond those recommended by the department was done by the Board of Fisheries for allocative reasons in order to provide a greater assurance that subsistence needs would always be met.” Exhibit 1 (February 27, 1997 Letter from ADF&G to STA).

In 2009, the Board again modified the harvest control rule primarily to ensure a reasonable opportunity for subsistence. The Board increased the allowable commercial harvest rate range from 10-20% to 12-20% and increased the



threshold from 20,000 to 25,000 tons, specifically to ensure a sufficient amount of herring would be available for subsistence. The Board raised the threshold despite ADF&G's assurances that the 20,000-ton threshold was already "conservative and appropriate for long-term productivity." Exhibit 2 (2009 ADF&G Staff Comments on Proposal 203). According to ADF&G, the "Board has established a more conservative threshold than recommended by biological analysis to provide reasonable opportunity for subsistence on Sitka Sound herring." Exhibit 3 (2012 ADF&G Staff Comments on Proposal 232).

Thus, the Board has a history of modifying the commercial harvest control rule solely to protect subsistence harvests. Proposal 156 is consistent with the Board's approach to ensuring a reasonable opportunity for subsistence by adopting incrementally more conservative commercial harvest strategies.

Currently, Sitka herring subsistence harvesters' needs are going unmet, and the Board's existing regulations do not provide a reasonable opportunity for subsistence uses. A "reasonable opportunity" means "an opportunity, as determined by the appropriate board, that allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant with a reasonable expectation of success of taking fish or game." AS 16.05.258(f).

The Board should consider all the available evidence when deciding whether the current regulations provide a reasonable opportunity for subsistence uses. Importantly, the ANS provides a key indicator of reasonable opportunity. The Department of Law ("DOL") has advised the Board that "consistent failure to harvest within the range identified as the amount necessary for subsistence may indicate a need to revisit" the current regulations to provide additional opportunity for subsistence. Exhibit 4 (February 17, 2009 DOL Memo).

In 2009, the Board set the ANS range at 136,000 to 227,000 pounds, revising the Board's 1989 ANS range of 105,000 to 158,000 pounds. "This finding was based on the best available harvest data, including results from a 1996 household harvest survey and a 1989 harvest estimate range (Schroeder and Kookesh 1990)." (Sill & Cunningham 2021). There is no evidence that the Board's ANS findings should be revisited or that there has been a decrease in the amount necessary for subsistence. Reliance on Sitka herring from throughout the region has only increased because other southeast Alaska herring stocks have collapsed since the Board determined



the Sitka ANS. The ANS remains the best indicator of whether subsistence harvesters are meeting their needs for herring spawn. (Sill & Cunningham 2021).

Subsistence harvests have consistently failed to meet the range identified as the ANS for Sitka Sound herring for the past 10 years. ADF&G acknowledges that the low range of ANS “has been achieved only once since 2010.” (Sill & Cunningham 2021). The low range of the ANS has been met only seven times in the last 20 years.

Although ADF&G's staff comments point out that there are other factors that contribute to subsistence harvest success, the consistent failure to meet even the low range of the ANS over the last 20 years—despite varying environmental and biological conditions—suggests that subsistence harvesters’ unmet needs must be addressed through amended regulations.

It is simply not true that subsistence harvesters’ consistent failure to meet the ANS is due to lack of effort. Data collected by ADF&G’s Subsistence Division and STA through annual subsistence harvest surveys indicate that subsistence catch-per-unit-effort (“CPUE”) has been declining. Exhibit 5 (Affidavit of Dr. Greg Ruggerone). CPUE is a widely recognized metric for determining the effort required to successfully harvest (efficiency). Because the CPUE for subsistence harvesters is declining, there is expected to be a corresponding decline in participation, which is indicative of a lack of accessible, high-quality herring spawn, and not a lack of effort. Efficiency plays a strong role in patterns of subsistence harvest (Wolfe 2004) and participants drop from the herring egg fishery as efficiency declines. Thus, especially in years when the quality of herring eggs is poor, smaller, less efficient harvesters will simply not attempt to harvest.

In the past, Board members have relied on the subsistence harvest “success rates” to determine reasonable opportunity. But the reported success rates are misleading because they do not account for the quality and quantity of herring spawn actually harvested. For example, ADF&G’s data would indicate that a subsistence harvester who collected 1 pound of poor-quality herring eggs achieved a “successful” harvest. That metric simply does not account for the quantity and quality of the harvest, which this Board has consistently recognized as an important consideration in providing a reasonable opportunity for subsistence uses.

The evidence is overwhelming that current regulations do not provide a reasonable opportunity for subsistence: the ANS has consistently not been met; CPUE is declining, leading to a corresponding decline in participation; and subsistence harvesters have consistently reported declines in the quality of herring eggs collected.

Thus, to meet its statutory obligation to ensure that the *priority* use of Sitka herring is for subsistence, the Board should amend the harvest control rule as described in Proposal 156. The Board should reduce the commercial harvest rates on herring when the forecasted biomass is less than 120,000 tons to provide increased opportunity for subsistence harvesters.

The scientific literature supports adopting Proposal 156 as a measure to provide additional subsistence opportunity. The National Marine Fisheries Service (NMFS) has determined that commercial sac roe fisheries adversely affect herring population dynamics and subsistence herring egg harvests. (Shelton et al. 2014). And a different study found that reducing the harvest rate on herring to 10% led to reduced risk, increased subsistence harvest, increased herring biomass, improved age structure, greater commercial harvest stability, and more frequent commercial openings. (Okamoto et al. 2020).

Although a large herring biomass alone is not sufficient to ensure a reasonable opportunity for subsistence uses and large biomasses are not correlated with subsistence success, (Sill and Lemons 2020) decreasing commercial harvest rates especially in years with low biomass forecasts will likely ensure that more herring are able to spawn and provide eggs for subsistence harvesters. The reduced harvest rate will reduce stress and mortality on spawning herring, leading to more abundant and higher quality spawn and a greater likelihood of ensuring a reasonable opportunity for subsistence uses.

- **Proposal 156 Is Necessary to Address Scientific Uncertainties in ADF&G's Biological Modeling and Forecasts.**

ADF&G represents that it provides the Board with the “best scientific information.” However, there are important scientific considerations that ADF&G does not discuss in its staff comments or reports to the Board. There are



uncertainties in ADF&G's biological modeling and annual biomass forecasts that affect the amount of herring available for subsistence uses.

First, ADF&G's annual herring biomass forecasts have high degrees of uncertainty that have not been previously disclosed to the Board. The annual biomass forecast is a critical calculation because it determines the guideline harvest level ("GHL")—the amount of herring the commercial fishery is authorized to harvest. Unreported uncertainties in ADF&G's annual forecasts are cause for alarm, indicating that the current harvest control rule as provided in regulation is not conservative enough.

For example, in 2021, ADF&G deviated from the regulatory formula that the Board established for calculating the GHL. Under the regulatory formula, the GHL would have been 42,091 tons. Exhibit 6 (2021 Herring Forecast for Sitka). But ADF&G applied an arbitrary 21% reduction to the GHL, reducing the final 2021 GHL to 33,304 tons. Exhibit 7 (January 11, 2021 Sitka Sound Herring Fishery Announcement).

According to ADF&G, the deviation from the statutory formula was necessary because there was too much uncertainty in the forecast model. "The uncertainty in the estimated abundance, survival, and increased maturity of the 2020 age-4 cohort is justification for taking conservative management action, if chosen by management." Exhibit 6 at 6. In other words, ADF&G's forecast model does not achieve the level of confidence that ADF&G's own scientists believe is necessary for management. ADF&G is forced to reduce the GHL to account for that uncertainty. But ADF&G's determinations to reduce the GHL and decision-making takes place behind closed doors. The public is not given the opportunity to comment or participate in the process until a final decision has already been made.

ADF&G took similar measures to arbitrarily reduce the GHL in 2020. Under the regulatory formula, the 2020 GHL would have been 42,466 tons. But ADF&G reduced the formula's results by 39% resulting in a final 2020 GHL of 25,824 tons (still a record high). According to ADF&G, the uncertainty in the forecast model was necessary due to the high number of age-4 fish. ADF&G concluded: "until additional data can be collected in future years to improve estimation of the 2016



year class, the survival and overall magnitude of this year class remains highly uncertain.” Exhibit 8 at p. 2 (2020 Herring Forecast for Sitka).

ADF&G’s forecast model is clearly not working and ADF&G has not acknowledged publicly that it already has the information necessary to improve the forecast model. In 2016, ADF&G received a final report from an independent consultant, Dr. Steve Martell. Exhibit 9. The Martell Report provided recommendations for updating ADF&G’s forecasting model, including equations and computer codes specifically designed to address and improve the certainty in the annual herring forecasts. Although ADF&G has had the ability to implement the Martell Report’s recommendations and improve the forecasting model for over five years now, it has not done so.¹

If ADF&G believes that it is necessary to deviate from the established regulation in order to achieve conservative herring management, then the Board must revisit the current regulation to address the underlying issue and provide a more conservative harvest control rule.

Second, there is an urgent need to adopt a more conservative commercial harvest control rule because ADF&G has failed to update the calculation of average unfished biomass (“AUB”) for Sitka herring. The AUB is a measure of the “pristine” biomass, which ADF&G relies on to manage the fishery for sustained yield. ADF&G’s estimate of the AUB is 67,036 tons; however, ADF&G has not updated that estimate with new data since 1997. (Carlile, 1998). Data collected by ADF&G over the last 20 years and traditional ecological knowledge suggest that the AUB should be significantly higher than the current amount, which would have important implications for the commercial and subsistence fisheries.

¹ On November 27, 2020, Sealaska submitted to ADF&G a report authored by Dr. Merrill Rudd entitled “Considering stock assessment uncertainty for the 2021 Sitka herring fishery guideline harvest limit.” Exhibit 10. Dr. Rudd pointed out that if ADF&G adopted the recommendations in the Martell Report, “the forecast may be taken at face-value and interpreted by managers without the need for ADF&G to take precautionary measures when setting the GHL.” Dr. Rudd further explained that “there are many additional uncertainties associated with the ASA model and forecast that would be improved when Dr. Martell’s proposed changes are implemented.”



Traditional ecological knowledge of Sitka herring clearly describes a relatively recent and large decline in the abundance and spatiotemporal distribution of herring spawn in Sitka Sound. (Gmelch and Gmelch 1985; Schroeder and Kookesh 1990; Thornton et al. 2020). Spawn that once filled every beach and bay for weeks at a time and piled eggs “two feet high” (Schroeder and Kookesh 1990) no longer occurs in Sitka Sound. Herring no longer spawn in predictable, traditional locations, and spawning patterns have changed dramatically.

Although undoubtedly the recent herring returns have been high, there is still a need to adopt a more conservative management approach because ADF&G has acknowledged that the high spawning biomasses in 2020 and 2021 were unexpected under ADF&G’s current scientific paradigm. In 2019, ADF&G’s chief herring scientist, Dr. Sherri Dressel, testified that a returning herring biomass that is double the AUB was “unlikely to ever happen.” It has happened in both of the last two seasons (2020 and 2021).

There is a significant risk that allowing ADF&G to continue managing the Sitka herring fishery under its current, faulty assumptions will perpetuate artificially low returning herring biomasses. Shifting baseline syndrome occurs when populations are managed at levels below their natural (pristine) abundance. (Pauly 1995). If ADF&G continues to manage the Sitka herring population for a pristine abundance at 67,036 tons, despite evidence that the actual pristine abundance is much higher, then it is likely that overharvests during years with low biomasses will prove catastrophic for the entire population and ecosystem.

Although the current high biomass may suggest that additional conservation measures are unnecessary, it is important to understand the context for what is considered a “high” biomass. ADF&G has shifted the goalposts before. In the 1980s, ADF&G claimed that Sitka herring biomasses of approximately 30,000 tons were healthy and on the high end. Similar erroneous claims were made regarding other Southeast Alaska herring populations, which are notably no longer productive for commercial or subsistence harvesters. Thus, importantly, there is no certainty that Sitka herring abundance will continue at its current levels into the future.



The Board should adopt Proposal 156 as an additional conservation measure until ADF&G updates the AUB. The original analysis conducted by Carlile (1998) acknowledged the AUB calculation was not robust and would need to be updated as new data became available. ADF&G has inexplicably refused to update the AUB with new information that it already collects.

Proposal 157: Limit the commercial harvest rate of old herring to 20%.

STA supports Proposal 157, which would limit the harvest rate of older herring to 20%. The Sitka commercial sac roe fishery consistently targets the oldest, largest, most fecund fish in the population. Harvest and spawning biomass data provided by ADF&G to STA demonstrate that the average harvest rate on older herring (age 5+) is twice the average harvest rate on young herring (age 3 and age 4) in recent years. Regulations currently allow the harvest rate on specific age components of Sitka Sound herring to exceed 20% (i.e., high-grading) as long as the overall harvest rate is 20% or less. Theoretically, under current regulations, the entire guideline harvest level (GHL), or even 100% of the older population, could be taken with the largest most fecund herring leaving few large fish to spawn, if the fishery was more efficient when selectively harvesting large herring.

Proposals 157 and 158 aim to protect the oldest fish in the population, which are the most important fish in the population. Traditional Ecological Knowledge (TEK) and theoretical models indicate that older fish lead younger, relatively inexperienced fish to appropriate spawning grounds (MacCall et al. 2018). Currently, all sites within the Sitka Sound sac roe management area are assumed to be equally productive; this is unlikely to be true. Modeling studies found that in the absence of localized spatially-explicit recruitment and productivity data, managers should assume behavior follows the Go With Older Fish model and reduce harvest rates to reduce the risk of losing spawning habitat (Voss et al. 2018).

Repeatedly harvesting more than 20% of the oldest, most fecund fish will have compounding effects on the age structure and productivity of the population. Old, large fish have a higher fecundity and larger, more well-provisioned eggs that are more likely to survive; older fish contribute disproportionately to future generations (Hixon et al. 2014; Barneche et al. 2018). A population of older, larger fish will have much greater reproductive success than an equivalent biomass of younger, smaller fish (Venturelli et al. 2009). Size-selective fishing, such as in Sitka

Sound, can lead to reduced size and a truncated age structure (Barnett et al. 2017). Truncated age and size structure increases variability in recruitment and reduces resiliency in the face of other stressors, including climate change (NFMS 2014). Climate change and ocean acidification have been documented to have negative impacts on Atlantic herring (Frommel et al. 2014). NMFS (2014) summed up the importance of older herring in their status review of Southeast Alaska herring:

"In many fish species as well as Pacific herring, older spawning females tend to produce larger eggs and subsequently larger larvae than do younger, smaller adults (Hay 1985; Chambers and Leggett 1996). In British Columbia, fecundity was found to be almost directly proportional to body weight with a larger female producing up to 180% more than a recruit spawner and the maximum reproductive value occurring between the ages of 9 and 10 (Ware 1985). These older fish may play a pivotal role in replenishing stocks, with larvae from older fish surviving starvation longer and growing faster on the same diet which is then reflected in subsequent recruitment (Berkeley et al. 2004). The percentage of dead and abnormal spawners in the progeny of probable first time spawners (4 -5 year old parent fish) has been found to be higher than the offspring of 6 – 9 year old fish (Ojaveer 2006). Populations composed of small and younger individuals will therefore have reduced reproductive potential (Scott et al. 1999) and potentially increased variance in offspring survival (Hutchings and Myers 1993). Furthermore, a stock with a higher proportion of older and larger fish should produce more eggs providing a higher probability of recruitment success (Schweigert et al. 2007). A clupeoid collapse can be due to heavy fishing mortality which reduces the mean age of the population and forces the very young fish to sustain the reproductive load with a decreased age at first reproduction (Ware 1985). [references provided in NMFS 2014].

Consistently harvesting the oldest, largest, and most fecund fish from a population is a strategy that maximizes short-term economic interests and sacrifices the long-term biological health of the population and ecological wellbeing of the marine system. There was no sac roe fishery in 2019 or 2020 because there were not enough of the largest, oldest fish in the population to meet market demands.



Proposal 157 seeks to address the current selectivity and high-grading of older fish in the Sitka Sound sac roe fishery. Proposal 157's goal is to limit the harvest rate on older herring (age 5+) to 20% or less to help maintain future production. This goal is consistent with the current regulatory strategy to limit the overall harvest rate on herring to 20% or less. However, the current goal does not consider the selectivity of the fishery on older herring, in which the current harvest rate is twice that on younger herring according to ADF&G data. In order to limit the harvest rate on older herring to 20% or less, the overall guideline harvest level must be reduced to account for selectivity for older herring in the commercial fishery. This proposal does not seek to create two separate GHGs to be managed by ADF&G, but to introduce a correction factor for selectivity in order to limit the potential for overexploitation of the oldest, most important fish in the population.

STA recognizes that ADF&G managers would be required to sample the herring fishery immediately prior to the first opening and determine whether the age composition (and biomass) differs from the preseason forecast. Importantly, the recommended formulae are more conservative (protective) of the herring population than the status quo harvest control rule. In-season refinement of age composition could be used to make the fishery more protective if the percentage of old fish were to decrease from the preseason forecast. In-season adjustments could also be used to increase harvests up to the maximum 20% harvest rate if the percentage of old fish were to increase from the preseason forecast.

Proposal 158: Close the commercial sac roe fishery when the proportion of old fish is very low.

STA supports Proposal 158, which would protect older fish by closing the fishery when there are relatively few older fish in the population. Closing the fishery when there are insufficient older fish will prevent the population from suffering from undue harvest pressure and allow older fish to fulfill their important ecological role. Older fish help ensure more herring spawn in optimal locations and that more larval herring survive and are recruited to the spawning population.

Currently, ADF&G does not adequately consider spatiotemporal distribution of spawn when managing the commercial fishery. ADF&G considers the total number of older fish and not the proportion of older fish. However,



traditional knowledge holds that both the abundance and proportion of older fish are important. In some recent years, few herring have spawned in the “Core Area” and the herring population included relatively few older herring, with 2019 being a prime example. The biomass was high by contemporary standards (130,000 tons) with a relatively large biomass of older fish. However, young fish made up 89% of the population in 2019 and there was effectively no spawn in the Core Area, resulting in one of the worst subsistence harvests of Sitka Sound herring ever, despite a large biomass (Sill and Lemons 2021). The results of 2019 and other years support the Go With Older Fish theory, rooted in traditional knowledge and independently verified by the most up-to-date fisheries science (MacCall et al. 2018).

Proposal 159: Repeal 5 AAC 27.195.

5 AAC 27.195. Sitka Sound commercial sac roe fishery.

- (a) In managing the commercial sac roe herring fishery in Section 13-B north of the latitude of Aspid Cape (Sitka Sound), the department shall
 - (1) manage the fishery consistent with the applicable provisions of 5 AAC 27.160(g) and 5 AAC 27.190;
 - (2) distribute the commercial harvest by fishing time and area if the department determines that it is necessary to ensure that subsistence users have a reasonable opportunity to harvest the amount of herring spawn necessary for subsistence uses specified in 5 AAC 01.716(b).
- (b) In addition to the provisions of (a) of this section, the department shall consider the quality and quantity of herring spawn on branches, kelp, and seaweed, and herring sac roe when making management decisions regarding the subsistence herring spawn and commercial sac roe fisheries in Section 13-B north of the latitude of Aspid Cape.

STA strongly opposes Proposal 159, which would repeal 5 AAC 27.195. If the Board repeals 5 AAC 27.195, the remaining regulations would not meet the



Board's statutory obligation to ensure a reasonable opportunity for subsistence uses of herring spawn in Sitka Sound.

5 AAC 27.195 resulted from a compromise among ADF&G, STA, and the commercial fishing industry. In 2001, STA requested the Board adopt new regulations requiring ADF&G to disperse the commercial fishery throughout Sitka Sound to minimize the impacts to subsistence harvesters. Exhibit 11 (Memo from Jude Pate to Board). ADF&G and the commercial industry initially opposed the dispersal plan, but the Board negotiated a compromise. The resulting regulation, 5 AAC 27.195, delegates authority to ADF&G's in-season manager to ensure a reasonable opportunity for subsistence by distributing the commercial fishery by "time and area" throughout Sitka Sound. The Board specifically required ADF&G to consider the "quality and quantity" of herring spawn available to subsistence harvesters when making management decisions regarding the commercial fishery.

This important regulation was the subject of STA's recent lawsuit against ADF&G. After the catastrophic 2018 season, which was among the worst subsistence harvests ever, STA requested that ADF&G consider using its management authority to delay the commercial fishery until after the first spawn and moving the commercial fishery further away from important subsistence areas. ADF&G not only refused to consider STA's suggestions, but it also disclaimed any authority to take the management actions STA requested. ADF&G erroneously explained that it did not have the authority to delay the commercial fishery solely to provide a reasonable opportunity for subsistence. And ADF&G falsely believed that it could not distribute the commercial fishery away from important subsistence harvest areas because the Board's closed area regulations "mostly" addressed subsistence harvesters' concerns. ADF&G made it clear that it was not implementing 5 AAC 27.195 as the Board intended.

STA's lawsuit sought to enforce the Board's regulation and dispel ADF&G's erroneous interpretation and implementation of 5 AAC 27.195. Ultimately, STA prevailed on two summary judgment decisions issued by Superior Court Judge Daniel Schally. ADF&G decided not to appeal the decisions.

On March 31, 2020, the court issued its decision on the first part of the regulation, 5 AAC 27.195(a)(2), agreeing with STA. Exhibit 12. The court explicitly rejected ADF&G's interpretation of the regulation, calling it a "hodgepodge" and



ADF&G's arguments for not implementing the regulation "arbitrary and capricious." The court made it clear that ADF&G has authority and the duty to ensure a reasonable opportunity for subsistence.

"ADF&G is required to (1) determine whether subsistence users have a reasonable opportunity to harvest the amount of herring spawn necessary for subsistence uses in Sitka Sound as a whole, which is 136,000-227,000 pounds; and (2) if ADF&G determines that a reasonable opportunity does not exist, distribute the commercial harvest by fishing time and area to the extent and in a way necessary to ensure a reasonable opportunity does exist in Sitka Sound as a whole. ADFG must make these determinations before permitting a commercial harvest in the Sitka Sound."

Importantly, the court recognized that the authority vested in ADF&G to ensure a reasonable opportunity for subsistence is critical. *"5 AAC 27.195(a) determinations are important; they have the potential of directly altering the allocation of the fishery between the subsistence and commercial harvests."* (emphasis added).

Then on November 27, 2020, the court issued its second decision, agreeing with STA's interpretation of 5 AAC 27.195(b). Exhibit 13. The court agreed with STA that section 195(b) requires ADF&G to consider the "quality and quantity" of herring spawn on branches, kelp, and seaweed. The court rejected ADF&G's and the Southeast Herring Conservation Alliance's arguments that section 195(b) was unenforceable. The court concluded that there was doubt that ADF&G had failed to consider the quality of herring spawn when making management decisions. "There is therefore no genuine dispute of material fact as to whether ADF&G is unlawfully implementing 5 AAC 27.195(b) by failing to consider quality of herring spawn 'on branches, kelp, and seaweed, and herring sac roe' before making required management decisions under 5 AAC 27.195(a)(2)."

Going forward, the court instructed ADF&G to consider the "quality and quantity" of herring spawn available for subsistence uses when making management decisions regarding the commercial fishery. "In other words,



ADF&G must demonstrate in the record that it, and how it, in some meaningful way, considered the quality of herring spawn in making management determinations under 5 AAC 27.195(a)(2)."

After the court decisions and prior to the 2021 season, STA provided ADF&G with a report entitled "Subsistence Management Recommendations and Guidance for Implementing 5 AAC 27.195." Exhibit 14. STA offered recommendations for how ADF&G can make the required determinations as to whether subsistence harvesters have a reasonable opportunity, and guidance for considering the quality and quantity of herring spawn during the season.

ADF&G assured STA that the in-season manager would implement 5 AAC 27.195 during the 2021 season and would better document ADF&G's decision-making. ADF&G also accepted STA's offer to improve communication between ADF&G and STA during the season. Exhibit 15 (Letter from Commissioner Vincent-Lang to STA). Thus, there is no question that ADF&G can implement 5 AAC 27.195 and must continue to do so consistent with the court's orders.

Proposal 159, which would repeal 5 AAC 27.195, lacks any conceivable justification. As the court in *STA v. ADF&G* recognized, ADF&G's in-season determinations are "important" to ensuring a reasonable opportunity for subsistence uses. If the Board repealed 5 AAC 27.195, the Board would be in violation of its statutory obligation to provide a subsistence priority. *See* AS 16.05.258. ADF&G's Division of Subsistence has reported that biomass alone is not strongly correlated with subsistence success (Sill and Lemons 2020, p. 22).

ADF&G's staff comments on Proposal 159 indicate that if the Board repealed 5 AAC 27.195, ADF&G would continue to distribute the commercial fishery by time and area, and continue to consider the quality and quantity of herring spawn on branches, kelp, and seaweed. However, ADF&G fails to cite any other legal authority for taking such management actions. ADF&G's hollow assurances are insufficient. Without the legal obligation imposed by 5 AAC 27.195, subsistence harvesters would have no legal protections ensuring a reasonable opportunity for subsistence.

Thus, STA strongly encourages the Board to reject Proposal 159.



Proposal 160: Repeal 6.1 mi.² of the “Closed Areas” in Sitka Sound.

STA strongly opposes Proposal 160, which would reduce the regulatory closed waters in Sitka Sound by 6.1 square miles. The closed areas were adopted by the Board to protect the core subsistence harvest areas. In 2018, the Board expanded the regulatory closed areas by 6.1 square miles. Proposal 160 would reverse that decision after only one Board regulatory cycle. There is no rationale justification for reducing the regulatory closed areas, which were designed to provide a reasonable opportunity for subsistence uses.

ADF&G herring egg harvester surveys began collecting data on harvest locations in 2006 and have consistently indicated the areas around Middle, Crow, and Kasiana Islands as the most important and productive for subsistence harvesters, especially those without large vessels able to access more distant spawn (Holen et al. 2011; Sill and Lemons 2020). The reliability and sustainability of these areas for quantity and quality of herring spawn is also well documented prior to the advent of the sac roe fishery (Thornton and Kitka 2015).

The closed area represents an infinitesimal fraction of the Sitka Sound Sac Roe Herring Fishery management area and helps to distribute the commercial fishery in space rather than concentrating it in core spawning areas. The closed waters have a negligible impact on the commercial sac roe fishery and a potentially large benefit for subsistence users and for successful herring reproduction. A 58-foot seiner can fish anywhere between Point Kakul and Aspid Cape; a 14-foot skiff with a 20HP motor cannot reach many places beyond the current Closed Area. Closing this tiny area reduces the chances for disruption from commercial fishing activities, making it more likely fish will successfully spawn in optimal habitat for both future herring abundance and subsistence users. The closed area was just expanded in 2018, but anomalous spatiotemporal spawning patterns in 2018 and 2019 and the lack of a competitive commercial fishery since 2017 means that the impacts of this area have not even been properly vetted yet. Given that Sitka Sound is the last consistently viable subsistence herring stock in the North Pacific, it is imperative to protect the Core Area.

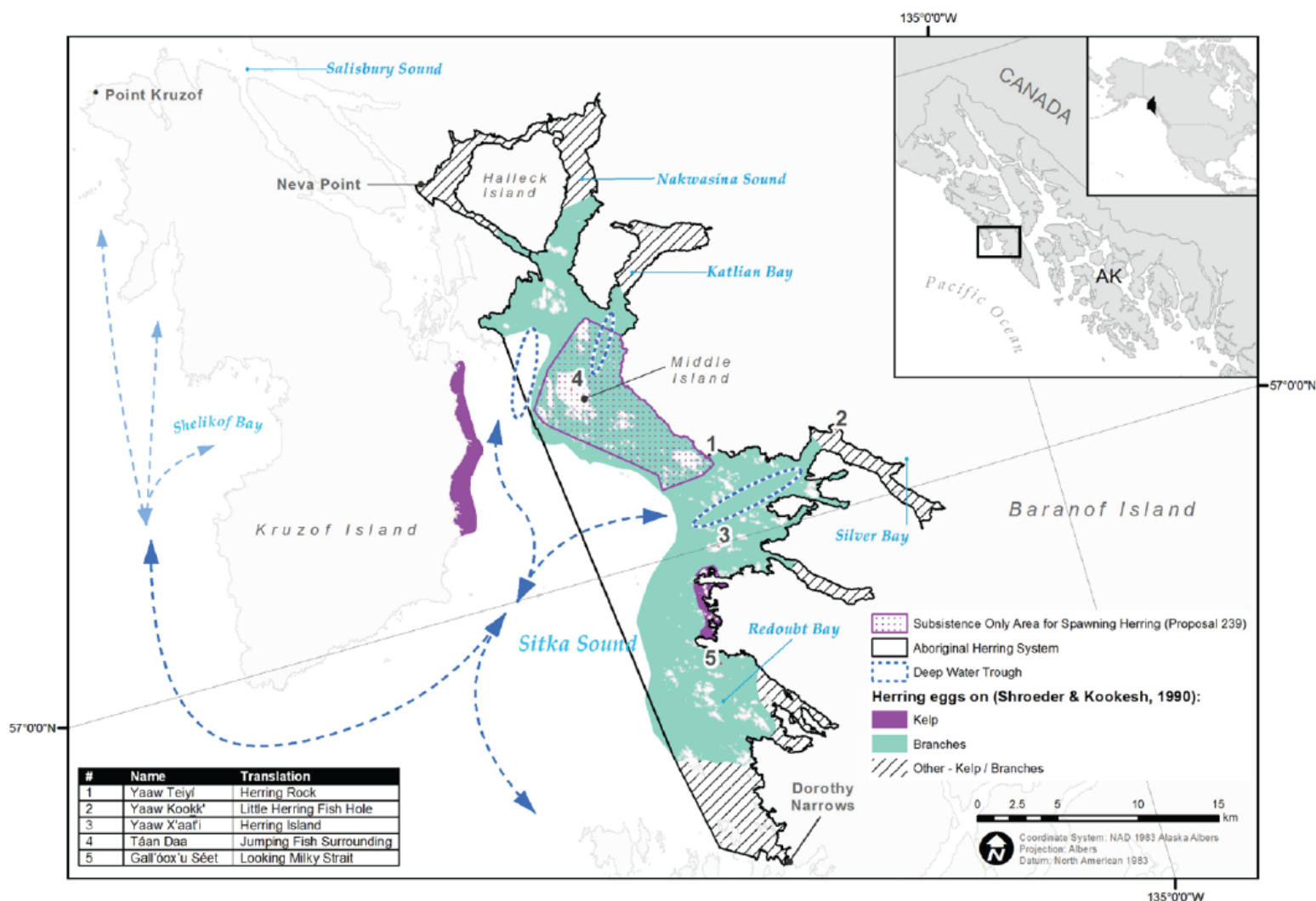


Figure 2. Map of indigenous herring system, Tlingit herring toponyms, precontact harvest areas, contemporary harvest areas reported in Schroeder and Kookesh (1990), and current closed area (purple hatching). Map from Thornton and Kitka (2015).



Proposal 161: Require subsistence herring egg on branches harvest permits.

STA strongly opposes Proposal 161, which would require individual subsistence harvest permits. Individual subsistence permits are culturally inappropriate for the Sitka herring spawn on branches fishery because it is a traditionally communal fishery. Nearly 90% of the harvest is shared with other households (Langdon 2021). The harvest is shared throughout the entire state of Alaska and beyond (Thornton 2019). The subsistence herring egg fishery is self-regulated by custom and tradition and would be undermined by the imposition of a permit system. The Amount Necessary for Subsistence has been met once in the past ten years (Sill and Cunningham 2021); there is no need for additional barriers that will only prevent people from enjoying a treasured traditional food. Herring eggs are the second-most widely consumed traditional food by Tribal Citizens in Sitka, trailing only salmon (McDowell Group 2017).

Subsistence harvest permits are unwarranted and redundant. Data collected by ADFG's Division of Subsistence and STA are already much more detailed and informative than standard subsistence fishery permit data. The interview format allows for discussion of traditional knowledge and has often shed light on areas for further study, such as data about harvest location or catch-per-unit-effort. Subsistence permit reports are designed to collect data on a small number of parameters associated with the harvest of a resource, while the subsistence survey collects a much larger and wider variety of qualitative and quantitative data at a more refined level. Staff conducting surveys can clarify the meaning or intent of a question for harvesters, eliminating confusion and increasing accuracy. Permit reports will give managers a 10,000-foot view of the fishery, while the depth and detail garnered from the current subsistence survey puts managers "in the boat" with harvesters and provides greater insight into the variables that affect the fishery.

The Board will almost certainly hear testimony that subsistence harvest issues are a result of too few participants in the fishery and “people not trying hard enough”. Data collected through the ADF&G and STA surveys allow for development of catch-per-unit effort (CPUE) analyses. This analysis was completed in early 2020, prior to published survey results from 2019 and beyond. Note that COVID-19 certainly depressed participation in 2020 and 2021. The CPUE for all harvester groups has been steadily declining over recent years. Efficiency plays a strong role in patterns of subsistence harvest (Wolfe 2004) and participants drop from the herring egg fishery as efficiency declines.

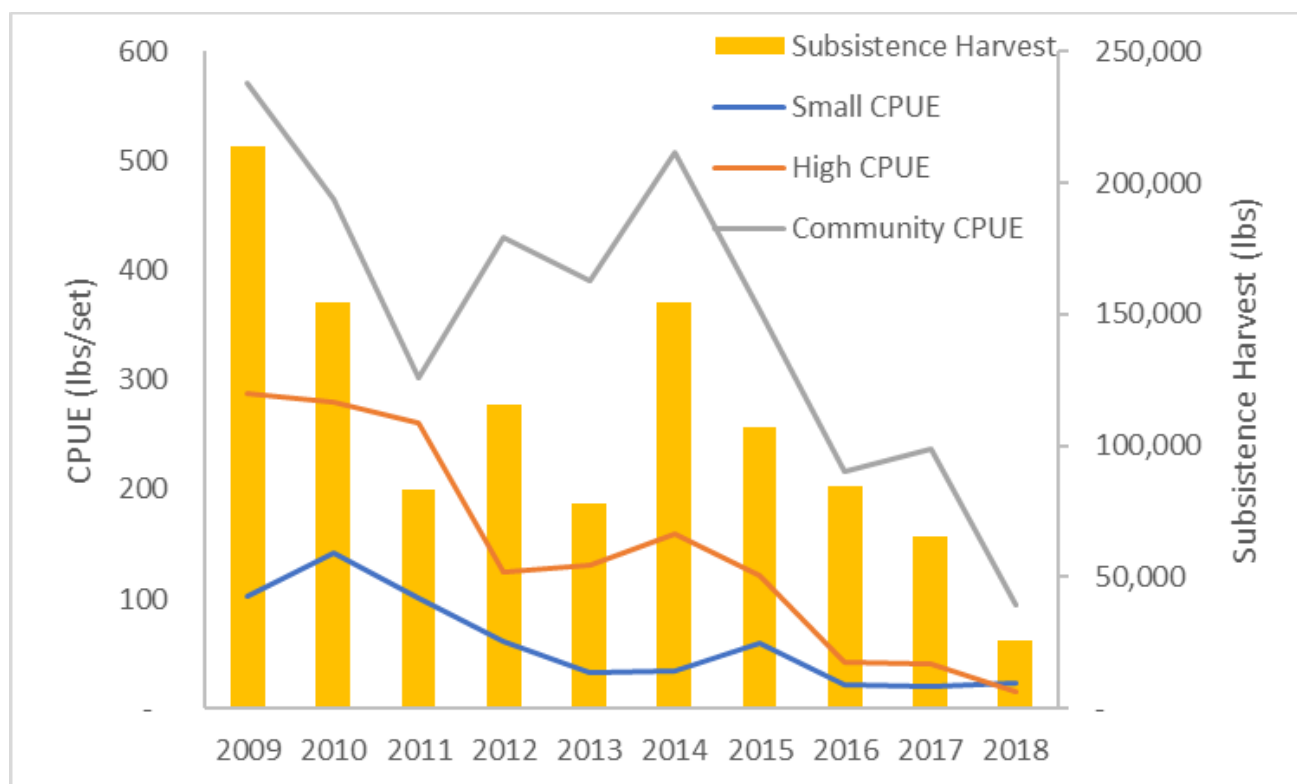


Figure 3. Catch-per-unit-effort for subsistence harvesters and total subsistence harvest. The Small, High, and Community labels refer to different strata of harvesters based on ADF&G methods to describe typical harvest volume of a given harvester.



Declines in participation are indicative of a lack of accessible high-quality spawn, a failure to manage for reasonable opportunity, and not a lack of effort. The CPUE of the largest harvesters is correlated to participation, lending credence to the idea of subsistence herring eggs as a communal fishery. The largest harvesters, the “super-households”, drive the overall harvest (Wolfe et al. 2010). These harvesters spend the most time on the water and survey the greatest area. They report back on conditions to the community at large. When harvest is poor, the smallest, least efficient harvesters will drop out of the fishery.

The main rationale for subsistence permits appears to be that permit data will result in the ADF&G Division of Subsistence producing annual reports more quickly. But the bottleneck in reporting appears to be staff time, and not data collection and reporting. The data collected through the survey is turned over to the Division of Subsistence by the end of June every year. The limited amount of data collected through a permit reporting system would be available to ADF&G in roughly the same timeframe. Although the survey collects a larger volume of data, either method requires staff time to conduct statistical analyses of the data and write the final report that accurately reflect the dynamics of the subsistence fishery. Simply instituting a permit requirement does not address the root of the problem. However, the annual reports would become much less information and much less useful to all parties.

Proposal 162: Increase permit limit for subsistence herring spawn-on-kelp.

STA supports Proposal 162, which would increase the possession limit for subsistence spawn-on-kelp harvest. STA supports any proposal that allows subsistence harvesters to increase their harvest of herring eggs so long as resources are properly managed and protected. There is currently no conservation concern with kelp beds.

Proposal 163: Equal quota shares for the commercial sac roe fishery.

STA does not support Proposal 163 as written. Although STA is generally supportive of “controlled fisheries,” STA has significant concerns regarding the effects of an equal quota shares commercial sac roe fishery on subsistence harvesters and the environment. If amendments are offered to address the following concerns (at a minimum) STA could consider supporting the proposal:



- Provide additional details on how the commercial fishery would be prosecuted and managed;
- Adopt regulatory provisions to minimize the commercial fishery's effects on herring, including avoiding disturbance to herring spawning patterns (noise, dispersal, etc.);²
- Adopt regulatory provisions limiting the number of commercial fishing boats that may participate in each opening;
- Adopt regulatory provisions limiting the number and duration of test sets; and
- Adopt regulatory provisions *prohibiting* the release of sets held for longer than 10 minutes.

² Studies have found mortalities greater than 50% in herring held in a net for as little as 10 minutes in crowded conditions. (Tenningen et al. 2012). It should be noted that herring suffered little mortality in non-crowded conditions. Thus, test sets must be set on the smallest number of herring possible and held as loosely as possible. The same study also concluded that stress indicators (e.g., cortisol) increased significantly and glucose levels dropped significantly, indicating herring are near exhaustion and likely vulnerable to predators after being release from a set. The Tennigen (2012) study was conducted on Norwegian herring, which are generally much larger than Sitka herring, suggesting an even higher mortality rate in Sitka due to high-grading and test sets. In 2008, STA hired divers to examine the seafloor following a commercial opener where they found thousands of dead herring.



Figure 4. Photo of dead herring and scales on seafloor after unknown sac roe opener, 2008.

Proposal 164: Equal quota shares for sac roe fishery with 10% overage clause.

STA strongly opposes Proposal 164, which is similar to Proposal 163, but would allow the commercial fishery to harvest based on a 10% overage clause.

Proposal 165: Allow unharvested sac roe quota to be used in food and bait fishery.

STA strongly opposes Proposal 165, which would allow unharvested quota from the commercial sac roe fishery to be used for a food and bait fishery. Subsistence herring harvests are struggling; there is no reason to add a new fishery to remove more adults from the population and make subsistence harvests even more challenging.

As the sac roe market declines, it appears that permit holders are searching for another market. STA worries that Proposal 165 is simply a fishmeal fishery in



disguise. STA is strongly opposed to a fishmeal fishery that will “rob Peter to pay Paul” by turning herring that feed valuable Alaskan fisheries like king salmon and halibut into fishmeal that will subsidize farmed salmon that will directly compete with Alaskan fisheries.

Additionally, there concerns about how well a bait fishery can be managed. Bait quality is best in the fall and winter months (Hebert 2021). However, the spatiotemporal distribution of herring outside of spawning season is not well understood. There is evidence that herring from different Southeast Alaska populations mix in the summer; however, there are no population-level data on winter distribution of herring in Southeast Alaska outside of one small study in Lynn Canal (Carls et al. 2008). STA does not want a return to the days of the reduction fishery with indiscriminate harvest of herring from unknown populations. Population-level Southeast Alaska herring distribution and migration are currently insufficient to know what populations are being harvested.

Proposal 166: Add open pound spawn-on-kelp fishery to G01A sac roe permits

STA opposes Proposal 166, which would allow a commercial pound spawn-on-kelp fishery in Sitka Sound. An open pound spawn-on-kelp fishery is preferable to a sac roe fishery, as adult herring are not killed by the fishery. However, STA opposes both a sac roe fishery and a spawn-on-kelp fishery in Sitka Sound. Having both a sac roe fishery and a spawn-on-kelp fishery will only marginally reduce the impacts of the sac roe fishery on subsistence users and the herring while adding competition for space between subsistence users and the open pound spawn-on-kelp fishery.

Proposals 168 / 169: Close Revilla Channel and West Behm Canal sac roe fisheries.

STA supports Proposals 168 and 169 to remove the Revilla Channel (Kah Shakes) and West Behm Canal herring fisheries from the regulations. Neither of these populations has been able to provide subsistence or commercial harvest in recent years. Kah Shakes was formerly one of the crown jewels of herring



abundance in Southeast Alaska (Hebert 2011). Subsistence users and forage fish advocates are saddened to see a once vibrant population reduced to its current state. STA notes that the management strategy used for these populations is less aggressive than the current Sitka Sound management strategy.

STA COMMENTS ON OTHER PROPOSALS

Chinook Proposals

Chinook salmon do not have a saltwater Customary and Traditional (C&T) Use designation under either State or Federal subsistence regulations. Unfortunately, that means that the subsistence harvest of Chinook salmon in saltwater is regulated under sport fishing regulations. STA supports Chinook proposals that prioritize resident sport harvest over the non-resident sector and believes the resident sport harvest should never be closed due to allocation restrictions.

Proposal 80 and 82 (Oppose as Written)

Although these proposals have merit, STA is opposed to them as written. Wording in these proposals could close resident sport fishery. Removal of the wording “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” under proposal 82 would prevent the closure or the resident sport fishery.

Proposal 81 (Oppose)

This proposal would reallocate unused sport Chinook allocation to the commercial troll fleet and eliminate the resident sport fishery.

Proposal 83 (Oppose)

This proposal prioritizes the non-resident resident sport fishery at the expense of other users.

Proposals 84, 85, 86, 93, 94, and 95 (Support)



STA supports the resident priority expressed in these proposals and their intent of never closing the resident sport fishery for Chinook.

Sport Proposals

Proposals 144 and 277 (Support)

Subsistence halibut are harvested in the Sitka area under federal subsistence regulations. Access to this resource can be impeded by large harvests from other user groups. The number of non-resident (unguided) sport halibut harvesters renting boats instead of using charter services has increased over the years. This has allowed these harvesters to increase their take of halibut, which has had a direct effect on the ability of subsistence harvesters to meet their needs. These proposals would bring non-resident sport halibut fishers in line with guide sport fishing regulations.

Proposal 145 (Support)

Non-resident annual possession limits for the harvest of salmon in freshwater can exceed annual subsistence harvest limits for the same systems. This proposal would reinforce subsistence priority over non-resident harvesters.

Subsistence Proposals

Proposal 131 (Support)

This proposal was submitted by STA to amend the Redoubt Bay and Lake Sockeye Salmon Fisheries Management Plan. The current harvest boundary is almost a mile away from Redoubt Lake Falls where sockeye salmon school up before making their way into the lake. This amendment would allow STA to fish its Community Harvest Permit further up the bay and have greater access to an underutilized resource.

Proposal 132 (Support)



STA has heard from numerous tribal citizens who dipnet subsistence sockeye at Redoubt Lake falls about their frustration with spear fishermen spooking salmon and disrupting their normal movement to directly interfering with their attempts to dipnet salmon. Multiple users have also reported close calls with boats nearly hitting unmarked spear fishermen. This conflict will continue to escalate unless the issue is addressed.

Proposal 133 (Support)

The Redoubt Lake sockeye salmon system has been producing exceptional returns that have been going underutilized due to limited access by subsistence harvesters. This has traditionally been a dipnet fishery with limited access for harvesters due to the limited number of locations that are conducive to dip netting. This proposal would allow for additional types of harvest gear to be used, increase access to the resource, and spread the subsistence harvest out over a larger area.

Shrimp and Miscellaneous Shellfish Proposals

Proposal 185 (Support)

Due to climate change Southeast Alaska waters are seeing a higher prevalence of market squid showing up in significant numbers during the fall and winter seasons. A number of local harvesters have taken advantage of these occurrences to harvest squid for food and bait with rod and reel. The use of artificial light would aid in the harvest of this underutilized resource.

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EXHIBIT LIST

- | | |
|------------|---|
| Exhibit 1 | February 27, 1997 Letter from ADF&G to STA |
| Exhibit 2 | 2009 ADF&G Staff Comments on Proposal 203 |
| Exhibit 3 | 2012 ADF&G Staff Comments on Proposal 232 |
| Exhibit 4 | February 17, 2009 Memorandum from Department of Law to Board of Fisheries |
| Exhibit 5 | Affidavit of Dr. Greg Ruggerone (Feb. 11, 2019) |
| Exhibit 6 | ADF&G, 2021 Herring Forecast for Sitka |
| Exhibit 7 | ADF&G, Sitka Sound Herring Fishery Announcement (Jan. 11, 2021) |
| Exhibit 8 | ADF&G, 2020 Herring Forecast for Sitka |
| Exhibit 9 | Dr. Steve Martell, Age-structured Model for Alaska Herring Stocks (Dec. 16, 2016) |
| Exhibit 10 | Dr. Merrill Rudd, Considering Stock Assessment Uncertainty for the 2021 Sitka Herring Fishery Guideline Harvest Limit (Nov. 27, 2020) |
| Exhibit 11 | January 7, 2002 Memorandum from Jude Pate (STA legal counsel) to Board of Fisheries |
| Exhibit 12 | Order Re: Cross Motions for Partial Summary Judgment on Count One, <i>Sitka Tribe of Alaska v. State, Department of Fish & Game</i> , 1SI-18-00212CI (Alaska Super. Ct., Mar. 31, 2020) |
| Exhibit 13 | Order Granting Renewed Motion for Partial Summary Judgment, <i>Sitka Tribe of Alaska v. State, Department of Fish & Game</i> , 1SI-18-00212CI (Alaska Super. Ct., Nov. 27, 2020) |



- Exhibit 14 STA, Subsistence Management Recommendations and Guidance for Implementing 5 AAC 27.195 (Mar. 18, 2021)
- Exhibit 15 February 18, 2021 Letter from ADF&G Commissioner Doug Vincent-Lang to STA

December 22, 2021

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Via Email: dfg.bof.comments@alaska.gov

Re: *Sitka Tribe of Alaska's Exhibits to On-time Public Comments*

Dear Alaska Board of Fisheries,

I represent the Sitka Tribe of Alaska, which submitted on-time public comments regarding proposals for the Board's 2022 Southeast/Yakutat Finfish and Shellfish meeting. On December 22, 2021, the Board Support staff notified me by email that STA's comment letter and exhibits would not be accepted because the Board's commenting guidelines limit public comments to 100 pages. STA's comment letter was 38 pages and its exhibits totaled 168 pages.

The Board is required to follow the Alaska Administrative Procedure Act ("APA"), AS 44.62, when adopting regulations. *See* AS 16.05.251. The APA provides that agencies "**shall consider all factual, substantive, and other relevant matter presented to it before adopting, amending, or repealing a regulation.**" AS 44.62.210(a) (emphasis added). By rejecting STA's exhibits, which contain information that is relevant to the Board's consideration of the proposals, the Board may be violating the APA and STA's right to due process. It is also important to note that the Alaska Department of Fish & Game has already submitted comments and reports that far exceed the 100-page limit.

STA requests that the Board reverse the Board Support staff's decision to reject STA's exhibits. The Board should accept and consider the 168 pages of relevant information that STA has compiled as exhibits to its comment letter.

Very truly yours,

LANDYE BENNETT BLUMSTEIN LLP

/s/ Andy Erickson

Andy Erickson



Southeast Alaska Conservation Council



PC330
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Juneau, AK 99801
(907) 586-6942
www.seacc.org

December 21, 2021

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Submitted via email to:
dfg.bof.comments@alaska.gov

**Subject: Proposals 156, 157, 158, 159, 160, 161, 163, 164, 165, and 166, for the 2021/2022
Board of Fisheries meeting cycle**

Based in Juneau, Alaska (Tlingit/Aak'w Kwáan lands), Southeast Alaska Conservation Council (SEACC) is a regional grassroots organization with more than 6,000 supporters. For over 50 years, SEACC has been bringing together diverse Alaskans from our region's communities to protect the natural resources of Southeast Alaska, ensure sound stewardship of the lands and waters of the region, and protect subsistence resources and traditional ways of life side-by-side with commercial fishing, tourism, and recreation.

SEACC believes that conservation of herring across our region, and specifically in Sitka Sound, is of urgent importance. Herring are a keystone forage fish species and critical food for salmon, especially king salmon, as well as for other economically and culturally important species such as humpback whales, harbor seals, and sea lions. In light of shrinking king salmon sizes and runs, SEACC believes the Board of Fish should take a conservative approach to manage critical forage fish such as herring.

Unfortunately, in the same time frame that king salmon are decreasing in size and number, 11 out of 13 Southeast Alaska herring populations have collapsed under the Alaska Department of Fish and Game's (ADF&G) management and have not rebounded to former levels even after decades without commercial fishing pressure. The history of management of Southeast Alaska's herring is one of stock after stock being overfished and unable to rebound.

Herring are important to Tlingit, Haida, and Tsimshian ways of life. Herring eggs, sustainably harvested from hemlock branches at sites across Southeast Alaska, were, until recently,



consistently available across the region. Now only Sitka Sound produces an occasionally reliable subsistence harvest adequate to meet the need for herring eggs across the region, and even in Sitka Sound, the defined amount reasonably necessary for subsistence (ANS) is infrequently met.¹ Given the subsistence, cultural, and spiritual importance of herring and herring eggs to Indigenous peoples across the state, SEACC urges the Board of Fish to take every measure to ensure the conservation of the critical Sitka Sound herring population, as well as the restoration of herring populations across their historic range.

Board of Fisheries Proposals

SEACC supports the three proposals submitted by the Sitka Tribe of Alaska. These proposals would result in more herring being left in the water to fulfill their crucial ecosystem and cultural roles in Sitka Sound, especially older, more fecund females which are important to herring spawning behavior.

SEACC supports Proposal 156, which seeks to improve the herring management formula by making it more conservative in years of low biomass. While this proposal would have no impact on sac roe seine harvest in years of high abundance, it would conserve herring for subsistence and ecosystem uses in lean years of low abundance when herring conservation is most essential. This proposal decreases the risk to this critical herring stock and promotes long-term abundance across the multiple uses of herring.

SEACC supports Proposal 157 and Proposal 158, which are closely related. These proposals recognize the behaviorally significant difference between herring age 3 to 4 and herring age 5 and above. Females aged 5 and above play a significant role in guiding schools to appropriate spawning grounds and provide spatial and temporal stability to spawning behavior across years. Females aged 3 to 4 are younger and have less established spawning behaviors that are vulnerable to disruption. Because of their higher fecundity, the older females are over-selected by the sac roe seine fishery.

SEACC supports Proposal 157 because it seeks to limit the harvest of older herring age 5 and older to no more than 20% of their age-class biomass and prevent overharvest of the larger, more biologically productive component of the herring population. SEACC also supports Proposal 158, which approaches the same problem from the other direction, by seeking to prevent sac roe seine exploitation if more than 80% of the herring population is age 3 to 4, i.e., not behaviorally mature.

¹ Alaska Department of Fish and Game Technical Paper No. 480, p. 32, <http://www.adfg.alaska.gov/techpap/TP480.pdf>



Together Proposals 156, 157, and 158 would ensure that the most fecund females are protected from overexploitation and that large age classes reach full sexual and behavioral maturity. Together they contribute to future sustained abundance for multiple users.

SEACC opposes Proposal 159, which seeks to remove ADF&G's responsibility to ensure subsistence users have reasonable opportunities to harvest herring eggs. ADF&G has not always been able to consistently ensure reasonable opportunity for subsistence harvest and removing reference to this responsibility sends the wrong message. ADF&G should do more to ensure reasonable opportunity for subsistence harvest, not less.

SEACC opposes Proposal 160, which seeks to shrink a protected area encompassing the prime subsistence harvest areas in protected waters closest to Sitka's road system. Reversing course on the protected area is unnecessary and may result in the depression of already poor subsistence harvests, as well as diminishing opportunity for subsistence harvest by lower-income, near-road system harvesters.

SEACC opposes Proposal 161, which seeks to require a subsistence permit to harvest eggs on branches. SEACC opposes the addition of bureaucratic barriers to subsistence harvest and opposes efforts by the sac roe seine permit holders that would increase burdens on subsistence herring egg harvesters.

SEACC opposes Proposal 163, which seeks to allow multiple sac roe permits to be used by a single vessel under an equal quota catch share system for commercial permit holders. This proposal would allow a few permit holders to consolidate control over the fishery.

SEACC opposes Proposal 164, which seeks to allow under or overutilization of quota to be carried over to future years. This proposal implies that overutilization would be permitted, an unacceptable scenario that could have serious negative impacts on the ecosystem, subsistence harvesters, and the herring population itself. Likewise, sac roe seiners could accrue significant carry-over quota from years of low sac roe seine utilization, such as in 2019 and 2020, which could ultimately result in dangerous overexploitation in years of relatively high abundance such as 2021.

SEACC opposes Proposal 165, which seeks to expand the seine harvest of herring across both space and time in ways that are not adequately defined. SEACC opposes the expansion of this fishery, especially if expansion includes uses that are not clearly defined. Expanding the geographic range of the herring seine fishery likewise reduces the likelihood the Sitka Sound



herring may eventually repopulate areas that have already lost their herring populations due to overfishing.

SEACC opposes Proposal 166, which seeks to expand the rights of sac roe seine permit holders to harvest spawn-on-kelp as an alternative to sac roe seining. While SEACC has no comment on spawn-on-kelp fisheries at this time, we oppose expanding the scope of the Sitka sac roe seine permits.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Meredith Trainor".

Meredith Trainor,
Executive Director
Southeast Alaska Conservation Council
meredith@seacc.org



Southeast Alaska Fishermen's Alliance



PC331
1 of 20

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

December 22, 2021

Alaska Board of Fisheries

Board Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Re: Southeast Board of Fish Cycle

Dear Chair Carlson-Van Dort and Board of Fisheries members,

Southeast Alaska Fishermen's Alliance (SEAF) is a multi-gear, multi-species commercial fishing organization representing our approx. 330+ members mainly involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. We have members involved in salmon gillnetting, trolling and seining, all of the SE crab fisheries, pot shrimp and halibut and sablefish fisheries throughout the State as well as SE region specific longline fisheries as well as many other fisheries such as herring and dive fisheries and some Prince William Sound gillnet. In addition, our members mostly hold sport fish licenses and are involved in sport, personal use and where eligible subsistence fisheries.

The gillnet fleet and the seine fleet (in separate meetings) meet annually in a task force meeting with the Dept in the fall, reviewing the past season and outlooks for the next season. These documents from our meeting this December could be very informative to Board of Fish members and an additional resource with preliminary 2021 data to the reports provided by ADF&G. These are posted online [HERE](http://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareasoutheast.salmon_meetings) ¹.

STOCKS OF CONCERN: First, we would like to comment on the stocks of concern/action plans submitted by the Dept. We will be submitting additional comments later. SEAF is very concerned about the status of many our stocks, particularly Chinook salmon.

¹ http://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareasoutheast.salmon_meetings



The Pacific Salmon Treaty chinook stocks (Taku & Stikine) under consideration of being listed as stocks of concern originate in Canada where we have no control over the habitat for spawning or as they emerge, no control over the harvest that occurs after crossing the border. The Pacific Salmon Treaty is very complex, but it also has more conservation and cooperative management imbedded in it than a non-participant is aware of. The catch and escapement of the Taku and Stikine are reviewed annually between Canada and AK with annual management plans on how each Country is to manage their fisheries based on the forecast and in-season assessments, basically an action plan built into the treaty reviewed yearly.

When the Taku and Stikine return meets the management target, there will be a Total Allowed Catch (TAC) that can be calculated and will result in an Allowable Catch (AC) for each country. If the Board of Fish adopts an action plan with specific identified actions, it will keep US fishermen from direct and indirect increases in harvest while Canada will be allowed to harvest within the current PSC negotiated agreement. If the Taku action plan is adopted with specific actions prescribed in regulation, conservation concerns and actions for Chinook will likely continue during a directed Sockeye fishery with a stock that has been exceeding its upper bound of the escapement goal and unable to harvest our allocated share of the sockeye return. While Canada will be able to remove or reduce conservation actions taken for Chinook conservation harvesting both Chinook and sockeye. This will likely result in Canada harvesting some portion of the US AC for Taku Sockeye.

SEAFA's recommendation would be to adopt the objective under Commercial Fisheries "Continue to manage per the Pacific Salmon Treaty and take management actions that reduces commercial harvest of Stikine River/Andrew Creek king salmon" without listing specific actions and the same action for the Taku.

The Chilkat River Chinook met the requirement to be considered for delisting based on the 2018 Action Plan. According to the presentation at the 2021 Gillnet and Seine task force meetings², the Chilkat River met its escapement in 2019, 2020, and 2021, three consecutive years. While ADF&G considers the escapement numbers for 2020 and 2021 preliminary, the escapement is enough above the lower bound escapement level to be able to state that the escapement was met. The Chilkat Chinook stock should be delisted or relax some of the actions taken in 2018 for District 15.

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http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/meetings/gillnet/2021_se_salmon_escapements.pdf page 21



We would point out that if you take language from the 2018 King Salmon River action plan, there was an inconsistency in directions regarding section 11-C. District 11-C is mainly opened in the end of July or August on returning pink salmon abundance. The conflicting statements are:

- Using emergency order authority, Do not open section 11-C to drift gillnetting
- Using emergency order authority, impose night closures between 10:00 pm and 4:00 am in sub-district 111-31 and Section 11-C if open.

If using language from the 2018 action plan, we would recommend that these two sections are reconciled by stating that Section 11-C will not open before July 20th. The King Salmon River Chinook should be past Section 11-C by this date based on the fishing experience in the area and the data that was presented.

SEAFSA appreciates the actions taken by the Board of Fish last cycle to provide flexibility within the action plans, allowing the Dept to choose more restrictive measures suggested in other options if they felt they were needed and putting the gear groups on notice that additional management measures could be implemented rather than prescribed to start with. Action planned on being taken were listed in the annual management plans provided pre-season every year and in discussion at the salmon task force meetings.

SESSION ONE

Comments on proposals are in the order presented in ADF&G's staff comments RC2

KING SALMON – GROUP 1

Proposal #80: SUPPORT

SEAFSA agrees with ADF&G that Chinook allocation issues need to be addressed based on the new treaty language. We would like added to the current allocation, a provision that allows the Dept to transfer unused all gear catch to the troll fleet so the Alaska's harvest share can be maximized (see proposal #81). For the issue of overages and how to allocate them, we would suggest that the payback provisions be taken off the top. If a gear group, exceeds their allocation in consecutive years, the allocation would come from their share. For example, gillnetters generally contributes extra fish to the troll fleet every year but 4 times in the 20 years, they went over their quota, one of those years payback would have been necessary because the overall quota was exceeded. The amount of Chinook the troll fleet would have received over time from the gillnet fleet of unused quota far exceeds the little bit that they



occasionally exceeded in their allocation³. We would note the gillnet harvest of Chinook is considered dead and therefore kept, the seine fleet is mostly on periods of non-retention right now in times of low chinook abundance generally providing the troll fleet with extra fish in September to maximize the harvest. In-season management of the sport fish sector is necessary with payback provisions involved to prevent overages with consideration given to a resident priority.

Proposal #81: SUPPORT

SEAFA supports a provision to allow the troll fleet to harvest unused Chinook salmon from other gear groups after September 1st. This proposal addresses one of the issues raised by ADF&G above in proposal #80.

Proposal #82: SUPPORT/AMEND

SEAFA supports ADF&G proposal to clarify sport fish regulations and to bring the current regulations into line with the new treaty provisions. We believe that it is very important that the resident sport fishermen always has the priority and opportunity to fish before a non-resident. Our suggested amendment is in section

(g) (2) when wild stocks 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].

We are supporting this amendment because if there are no wild stock management measures necessary, resident opportunity should not be restricted.

We would also note in the proposal the Dept highlights that under section (b)(1) the sport fishery is to be managed on average for its allocation but under sections (f), (g), and (h) the dept is to use in season management to stay within the sport allocation of the plan. SEAFA **recommends that the Board of Fish make the Southeast Alaska King Salmon Management Plan consistent with sections (f), (g), and (h) where the Dept manages the fishery in-season to stay within the sport allocation** of the plan based on the payback overage provisions of the Pacific Salmon Treaty.

Proposal #83: OPPOSE

SEAFA opposes this proposal that tries to achieve a 20% sport/80% troll allocation over time intentionally allowing the sport harvest sector to overharvest in years of low abundance. In trying to minimize the effect of a changing resource and provide stability to the charter sector, instability is passed on to the troll sector.

³ See RC 2 Staff Comments, page 4 Table 80-1 – 80-3

**Proposal #85: NO ACTION**

SEAFa suggests no action be taken on this proposal based on actions that will be taken on ADF&G's proposal #83. We support the concept within the proposal that provides resident sportfish a priority and making it clear that if in-season action is necessary to stay within the quota, the non-resident season and bag limit would be adjusted. It does appear that in proposal #83 the Dept is removing this exact language. We don't believe this language restricts department's flexibility but depends on the actions taken in proposals #80-83.

ENHANCEMENT AND SPECIAL HARVEST AREAS – GROUP 2

When reviewing enhancement and special harvest area proposals for Southeast Alaska, consideration of the SE Enhanced Allocation Plan ([5AAC 33.364](#)) and the Board of Fish Finding ([94-148 BF](#)) needs to be considered as well as the cumulative effect of any changes to the status quo will have on the individual gear groups allocations. Please remember SEAFa represents gillnet, seine and troll members and our comments try to balance the needs of all groups and in consideration of the Enhanced Allocation Plan status. See ADF&G report to the [Board RC 3, tab 2](#) to see graphs showing the current status of the allocation plan for those years with final data. NSRAA at the gillnet & seine task force meetings will provide a best guess estimate of the [current years data](#)⁴, showing 5-year rolling averages for 2016-20 and 2017-21. When looking at this more current data, keep in mind that the seine fleet will be losing a low year in the next 5-year rolling average and the gillnet fleet will be losing a high year.

Proposal #96: SUPPORT/AMEND

SEAFa supports the expansion of the District 1 Herring Bay Terminal Harvest Area July 1 – July 31, the time period ADF&G is comfortable with and has no concerns of wild king salmon interception. The troll fleet is below their allocation of hatchery produced salmon and this would help adjust them upwards.

Proposal #97: OPPOSE

SEAFa would point out that in ADF&G staff comments (RC 2) on this proposal, Figure 97-1 does not show the closed areas for crab gear in the month of June. A map of these closed areas can be seen in the [news release](#) dated April 16, 2021⁵. In addition, Southern Southeast Regional Aquaculture Association (SSRAA) closed the THA for cost recovery July 13 – August 9, 2021. It is our expectation that this closure will also occur in the upcoming years. Under this proposal, the

⁴ https://www.nsraa.org/pdfs/TaskForce/NSRAA_2021_GN_task_force.pdf pages 26-29

⁵ <http://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1258277085.pdf>



gillnet fleet and seine fleet will lose access to the THA four or five days in the month of June each, dependent upon the way stat weeks fall. All of the fleets are losing time and area due to conservation measures for wild stocks, particularly stocks of concern, the loss of this area as well as possible other closures in SSRAA THA's will impact the fleets and will have an impact on the SE Enhanced Salmon Allocations in different way for different fleets.

Proposal #98: AMEND

SEAFa opposes this proposal as presented but believes that based on the SE Enhanced Allocation plan and current status of the gear groups including the current trajectory of each gear group that the rotation in Anita Bay should stay at the 2018-2020 ratio of 1:1 gillnet to seine. During this time frame the seine fleet has entered within their range and the gillnet fleet while still above is below the high they had reached. Flipping over completely to a 2:1 ratio seine to gillnet provides too big of a swing in the allocation balance.

Proposal #99 & 100: NO ACTION

SEAFa does not believe that the drift gillnet should be taken out of the Southeast Cove Terminal Harvest Area Management Plan. While the gillnet fleet has not yet had an opportunity to fish in this area based on the current status of the Enhanced Salmon Allocation Plan but having them listed as a gear group, acts as a marker for the Association, Board of Fish and participants, that in the future this is an area that could be used to adjust the gillnet fleet upwards if necessary. The current arrangement of seine and troll opportunities could be continued in collaboration between the hatchery association and ADF&G.

Proposal #101: OPPOSE

SEAFa opposes this proposal to modify the Silver Bay Salmon Management Plan to attack the hatchery program in Southeast Alaska. The permitting process is a very public process with many opportunities to comment. Straying is a natural trait of salmon. Otherwise, we would not have salmon establishing themselves where the glaciers were long ago. Alaska has the best protections for salmon enhancement through our genetics policy, statutes and regulation framework, as well as the public process. SEAFa supports ADF&G's staff comments to oppose this anti-hatchery proposal.

Proposal #102: AMEND

SEAFa opposes this proposal as written to modify the ratio of seine to gillnet openings in Deep Inlet. As with proposal #98 and based on the SE Enhanced Allocation plan and current status of the gear groups including the current trajectory of each gear group that the rotation in Deep Inlet should stay at the 2018-2020 ratio of 1:1 gillnet to seine. During this time frame the seine fleet has entered within their range and the gillnet fleet while still above is below the high they



had reached. Flipping over completely to a 2:1 ratio seine to gillnet provides too big of a swing in the allocation balance. Actions being considered on proposal #98 and #102 must be considered in relation to each other and the overall change would have on the SE Enhanced Salmon Allocation Plan. If the Board was to adopt proposal #99, then consideration of opposing this proposal should be given serious consideration.

Proposal #103: OPPOSE

SEAFA opposes this proposal to modify the Management guideline for allocating Southeast AK pink, chum and sockeye salmon between commercial net fisheries. This is the wrong avenue to try and address anti-hatchery sentiments. Elevating statutes and the sustainable salmon fisheries policy is also unnecessary to bring these to the attention of the public. Processes are available for ADF&G to review the hatchery projects on a case-by-case basis when new information becomes available or the Dept has concerns the hatchery project is impacting wild stocks. The guideline requesting to be changed in this proposal was meant to be a snapshot in time of the harvest between net fisheries when necessary to help guide the Board of Fish in the event a major change in the fisheries occur due to the Pacific Salmon Treaty or other considerations. It is not meant to be a way to make changes in the SE enhanced salmon programs.

Proposal #104: SUPPORT/AMEND

SEAFA supports SSRAA's proposal to develop a Burnett Inlet Terminal Harvest Area Salmon Management Plan. This proposal could be amended to address one of the Dept's concerns by adding into the regulation a statement that **A gillnet or seine can not operate in such a manner that it cuts off the inlet or prevents safe navigation for other vessel transiting Burnett Inlet.** There are other THA's in Southeast Alaska that a common property fishery currently exists that has similar issues to Burnett Inlet.

Proposal #105: SUPPORT

SEAFA supports SSRAA's proposal to create a management plan and associated terminal harvest areas for Port St Nicholas. This hatchery return currently does not have an associated THA or management plan to provide opportunity when available to harvest salmon in excess of broodstock and cost recovery needs and this helps prevent straying.

Proposal #106: SUPPORT

SEAFA supports this proposal to add drift gillnet as a legal gear type for cost recovery in the Special Harvest Area (SHA). This just provides SSRAA additional flexibility in meeting their obligations to clean up excess salmon in the Special Harvest Area and to use the gear that is most effective in the circumstances.



Proposal # 107: SUPPORT

SEAFA supports the development of a management plan and THA in Port Asumcion. This hatchery return currently does not have an associated THA or management plan to provide opportunity when available to harvest salmon in excess of broodstock and cost recovery needs and this helps prevent straying.

Proposal #108: SUPPORT

SEAFA supports this proposal that creates a special harvest area for Port Asumcion. The first returns to this site were in 2019. This puts in regulation the area the Dept has been authorizing by EO authority. The plan for Port Asumcion when developed by the SSRAA Board of Directors was that Port Asumcion would mostly be a cost recovery site creating the necessity of having an area established. Proposal #107 develops the THA for clean-up of any chum salmon in excess of broodstock and cost recovery, a condition of the permit and also helps prevent any straying.

Proposal #109: SUPPORT

SEAFA supports the creation of a SHA in Carroll Inlet with the stipulations suggested by the Dept to open the area by EO to minimize the harvest of returning wild chum salmon.

COMMERCIAL SALMON – GROUP 3

Proposal #110: OPPOSE

SEAFA opposes this proposal to require mandatory reporting of a net lost or a portion of a net and the associated marking requirements that would become necessary. First the Dept is correct in the staff comments (RC2) that the cost of a net generally makes a fishermen try to recover all parts of the net possible just due to the expense, particularly the leadline and corklines. Second, in Southeast Alaska there is a lot of selling of used nets and corklines, the necessary marking such as Bristol Bay has would make the selling of a net with a corkline on it or a used corkline very undesirable in trying to take off the identification of the person selling and put on your identification information. In 36 years of fishing, I personally have only heard of one full net being lost and then the one that generated this proposal. If the Department wants voluntary reporting of lost nets or portion of a net, that could be requested through the gillnet task force meeting and the annual management plan as well as fishing associations putting the word out.

Proposal #111: SUPPORT

SEAFA supports this proposal we submitted to change the maximum size gillnet mesh to 6-1/4". The Dept summarizes the issue very well, But, you generally cannot buy a standard 6" net off



the shelf and have it work for both fisheries. If you are very knowledgeable, you can manage to buy a net that would work for both fisheries. While there have only been a couple of citations to date, surprising when on the dock talking to fishermen, we find many that are fishing there 6" net when the maximum 6" net restriction is in place and we suggest they measure their net and they are surprised to see that the net most likely measures more than 6-1/8". A 6" net is fished in District 11 & 15 at the beginning of the season by fishermen targeting the hatchery chum salmon. The early portion of the run are the larger 5-year-old fish. We would be willing to discuss this proposal with board members.

Proposal #112: SUPPORT/AMEND

SEAFA supports the use of deeper gillnets in District 11 by EO at the Departments discretion in sub-district 111-32 to help harvest our share of Taku treaty coho that have been very elusive to the gillnet fleet in recent years but have had good escapements.

Proposal #113: OPPOSE

SEAFA opposes this proposal to put a range in place for maximum gillnet mesh sizes as a person could not be prepared with what size net might be required, prompting fishermen to have more nets on hand at a cost of approximately \$7,000 or more each. Current regulation allows the Dept to have flexibility to require the appropriate size net for conservations concerns in the area necessary.

Proposal #115: SUPPORT/POSSIBLE AMENDMENT

SEAFA supports ATA's proposal to change the winter troll fishery start date from October 11 to the start (first day) of Stat week 41 so a consistent time frame is used going forward. That said this support is because of the new District 13 CPUE data assessment being used which uses the time frame of Stat week 41-48. Using a date within a Stat week creates a different number of days within the assessment period every year, sometime more and sometimes less. Our concern that could be addressed with an amendment is that the District 13 CPUE assessment is set to be reviewed periodically within the treaty arena. An amendment could be added to this change that the fishery would go back to an October 11 start date if the District 13 CPUE data assessment isn't being used or put a sunset date on the change so it can be reviewed next cycle after the Pacific salmon treaty review occurs.

Proposal #116: OPPOSE

SEAFA agrees with the comments by Staff that this proposal asking to use a judgement call on whether a salmon could survive creates an unenforceable regulation.

Proposal #117: SUPPORT/AMEND



SEAFa supports the intent of this proposal to allow the use of two additional fishing lines in the troll fishery in hatchery THAs during the month of August. SEAFa recommends that in addition to amending language in 5AAC 29.120 Gear and vessel Specifications and Registration amend 5AAC 29.112 Management of chum salmon troll fishery. This could be accomplished something like:

5AAC 29.120 Gear and vessel Specifications and Registration

- (a) Salmon may be taken by hand troll gear and power troll gear only in the Southeastern Alaska-Yakutat Area.
- (b) The maximum number of trolling lines that may be operate from a salmon troll vessel is as follows:
 - (1) From a power troll vessel:
 - (A) No more than six lines may be operated in the exclusive economic zone north of the latitude of the southernmost tip of Cape Spencer; **or as provided for by Emergency Order under 5AAC 29.112 Management of chum salmon troll fishery;**

And add a new section at the end of 5AAC 29.112 Management of chum salmon troll fishery

(e) The Department may open between August 1 and September 20th in the waters of Sitka Sound, Eastern Channel, Crawfish Inlet and West Crawfish Inlet, the liberalization of gear when participating in a directed fishery for enhanced chum salmon.

(1) from a power troll vessel: six lines

(2) from a hand troll vessel: four lines

(3) Coho and Chinook salmon may not be kept, sold or onboard a vessel participating in the directed chum salmon fishery with the additional lines.

We support this modification as a means to help increase the trollers harvest of enhanced fish as it would not affect wild stocks and the troll fleet has been below their allocation range since inception of the Southeast Enhanced Salmon Allocation Plan.

Proposal #118: OPPOSE

SEAFa understands the desire and benefit to moving the District 6 and 8 boundary line to the gillnet fleet. We understand and **support the Dept's opposition** to this proposal. Changing district lines has implications to other fisheries than just the gillnet fleet.

Proposal #119: SUPPORT/POSSIBLY AMEND

SEAFa supports clarifying the section 6D regulations between the gillnet and seine fishing opportunities. Allowing gillnetting in this area will provide a little more harvest to the gillnet



fleet which is cumulatively below their historical range⁶ for pink salmon as specified in 5AAC 33.363.

Proposal #121: OPPOSE

SEAFA opposes this proposal to close historical gillnetting waters near Coffman Cove. There has not been an increase of gillnets deployed in this area, but it is an important area to the small fleet of vessels (approx. 15) that traditionally fish within this area. To our knowledge, there have been no official complaints or incidents reported to any official agency that we could document of a safety to navigation. As the department states this is more an educational issue if vessels are having difficulty in navigating through the fleet. It appears that they are using the idea of safety as a way to try and move the gillnet fleet out of their way.

Proposal #122, 123 & 124: COMMENT

SEAFA agrees that removing the sunset date is important in keeping the Northern Southeast seine salmon management plan in regulation. The main difference between the three proposals is the date used for accounting of sockeye. This management plan was developed after much intense conflict at Board of Fish meetings repeatedly as a way to allocate sockeye between the two fleets and share in the burden of conservation and has been in place since the 1989 Board of Fish meeting. Pt Marsden shoreline is a very mixed stock fishery with all species of salmon going both northbound and southbound. In 2018 an agreement between the gillnet and seine fleets changed this regulation from the month of July to July 22 with a sunset date. We oppose proposal #123 to move the date even earlier to July 15. The drift gillnet fleet in District 15 and District 11 feel the effects in reduced availability of all salmon species following openings in this area, while this management plan allows the seiners opportunity on north migrating pink salmon when available. The peak of pink salmon migration is in the month of August, after this plan is no longer in effect.

SUBSISTENCE, PERSONAL USE, and SPORT SALMON AND OTHER NON GROUND FISH FINFISH – GROUP 4

Proposal #136 – NO ACTION

It is already illegal for a commercial fishing vessel with commercially caught salmon onboard to possess personal use taken or sport fish taken salmon onboard at the same time.

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http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/meetings/gillnet/120121_gtnf_handouts.pdf



Proposals #138-141: OPPOSE

SEAFa opposes the expansion of personal use sockeye fishing in the marine waters of District 11 (or portion thereof). In the early years of the Sweetheart lake sockeye personal use fishery, the marine waters of Gilbert Bay were open for the use of drift gillnet gear. This fishery was later closed after many subsistence nets were unable to be retrieved due to the number of pinks in the net and unable to be hauled or the dead pinks were released in violation of wanton waste laws while trying to target sockeye. If for some reason, consideration of allowing a personal use marine fishery were to occur, it would be important that non-species specific possession limits and annual limits be implemented and also consider a smaller length net with a season start date after June 30 to protect Taku and King Salmon River Chinook salmon. Fishery to occur only when the commercial fishery is closed.

HERRING – GROUP 5

Proposals #156, 157, & 158 OPPOSE

SEAFa opposes proposals 156, 157 & 158 to reduce the harvest of herring in the Sitka Sac Roe fishery. The current herring management is based on best scientific information available, the ASA herring model has been peer reviewed and the fishery has conservation principals built in the management strategy looking at both the herring population and the ecosystem.

Proposal #166: OPPOSE

SEAFa continues to oppose this proposal to convert Sitka Sound sac roe permits to a pound fishery. CFEC has held a hearing on this issue previously and determined at that time that they had not made a mistake in designating the areas under limited entry for the Sitka Sound Sac Roe fishery and the L21A herring pound permit. Without this change the Board does not have the regulatory authority to adopt this proposal.

SESSION TWO

COMMERCIAL, SUBSISTENCE, SPORT, PERSONAL USE GROUND FISH – GROUP 6

Proposal #217 SUPPORT

SEAFa supports changing the allocation for lingcod from the jig fishery to the troll fishery. Based on RC 2 staff comments, the jig fishery has had very minimal harvest since 2001 and the troll fishery is closed most seasons before the end of the year. This suggested allocation change still leaves lingcod allocation available for the jig fishery.



We do have a comment about the current regulation that the Board may want to clarify if they adopt and take action on this proposal. 5AAC 28.165 section (4) Central Southeast Outside Sector and section (5) Southern Southeast Outside Sector both have the same issue. Wouldn't hand troll gear in (E) also be included in section (D) under salmon troll fishery. We noticed in the Dept's comments they discussed the troll fishery and the jig fishery. Looking at the language below maybe section E should be amended as shown below

(D) seven percent to bycatch in the commercial salmon troll fishery;

(E) four percent to bycatch in the commercial groundfish fishery using [HAND TROLL GEAR AND] mechanical jigging machines;

Proposal #218 SUPPORT

SEAFA supports this proposal to require registration for the directed Pacific Cod fishery.

Proposal #219 SUPPORT

SEAFA supports ADF&G's proposal to allow rockfish to be taken and sold as bycatch based on allowances in pot gear.

Proposal #221 SUPPORT

SEAFA supports this proposal submitted by ADF&G to reduce the escape ring size down to 3-3/4" based on their research during the ADF&G surveys as the best fit for protecting immature fish and harvesting sablefish. This proposal while it lowers the minimum size it does not require fishermen to change their larger escape rings if they don't want to.

Proposal #222: SUPPORT

SEAFA supports ADF&G's proposal to require full retention of all rockfish in groundfish and halibut fisheries in the Eastern Gulf of Alaska area mirroring federal requirements.

Proposal #223: SUPPORT

SEAFA supports ADF&G proposal to require escape rings and clarify gear specification for the personal use and subsistence fisheries for sablefish.

Proposal #225: OPPOSE

SEAFA opposes this proposal to change sablefish bag and possession limits for sport fish. This is a one-way abundance based proposal to increase the allocation but does not have mechanisms to reduce the bag limit when the abundance declines. It is also starting the abundance changes at a baseline for the commercial sector that is below what it was when the bag and possession limits were originally set between the two sectors.

Proposal #229: OPPOSE



SEAFA opposes this proposal to increase the non-resident lingcod slot limit for sportfishing in the Central Southeast Outside Waters. It does not make sense to change the slot limit knowingly if it causes the harvest to exceed the allocation and the resource is fully allocated. Lingcod allocations were developed by a stakeholder committee and thru advisory committee recommendations to the Board of Fish and have been established for some time.

COMMERCIAL AND SPORT FISH CRAB PROPOSALS – GROUP 7

Proposal #190 & #191: SUPPORT/COMMENT

While PVOA and SEAFA submitted these proposals, we are holding off on providing comments at this time but agree with PVOA's assessment of these two proposals. We are in discussions with ADF&G on a possible revised management and harvest strategy for red king crab.

Proposal #192: SUPPORT

This is another joint proposal where PVOA & SEAFA were trying to find a way to provide a minimum amount of data for the Golden King Crab fishery as it is very data poor, depending solely on the information provided by the fishermen. ADF&G last year provided the King and Tanner task force a golden king crab harvest strategy but was unable to provide any feedback on industry's proposal until December 2021. ADF&G golden king crab harvest strategy does provide more transparency to their decision-making process but industry still has some major concerns over portions of the policy and would like more time to work with the Dept before it becomes a regulation.

Proposal #193: SUPPORT

SEAFA was a co-author on this proposal to increase the size of the golden king crab Southern Management area. There is depth and substrate suitable for golden king crab and redefining this area provides fishermen an opportunity to explore and possibly find suitable crab fishing grounds.

Proposal #194: SUPPORT

SEAFA supports this housekeeping proposal to remove Glacier Bay from the list of blue king crab fishing areas.

Proposal #195 & #197: SUPPORT/AMEND

SEAFA supports this proposal that would extend fishing time for the tanner crab fishery in the exploratory areas and redefine an exploratory area. At the December King and Tanner task force meeting, industry agreed to amend these proposals to read (Dates in the individual proposal) to April 1st whichever comes first.



Proposal #196: OPPOSE

SEAFA opposes reducing the pot limit for the golden king crab fishery in Southeast Alaska to 80 pots. Fishermen can currently haul 100 pots in a day. With a reduction in pots, some gear would be double hauled, increasing handling of small crab as they will have less time to escape from the pot. In addition, the new harvest strategy uses CPUE as one of the factors in the management, changing the metric from 100 pots to 80 pots will make all past metrics unusable.

Proposal #198: AMEND

The author of this proposal is a SEAFA member and we discussed his intent with this proposal following the King and Tanner crab task force meeting. First, it was never his intent to not have the tanner and golden king crab fishery start at the same time. (Board of Fish proposal instructions say to only reference one regulation per proposal making it difficult for fishermen to understand how to reference connecting regulations.) A compromise for the smaller vessels in the fleet might be starting the fishery on the appropriate tide between the 15th of Feb and the end of the month.

Proposal #200: OPPOSE

SEAFA opposes this proposal to close commercial and non-resident sport fishing to the taking of Dungeness crab. SEAFA opposes additional closures of any commercial fishing grounds where there is not a conservation concern. The number of commercial fishermen that fish in this area is less than 3 since the data is confidential. All areas where there are crab is becoming increasingly important as crabbers are getting squeezed by communities wanting closed areas around their community to the effect of ever expanding sea otters. We also oppose the size of the area being requested, but do appreciate that the closure was for both non-resident sport and commercial trying to truly provide a closure for community use only. In the staff comments RC 2 page 277 the Dept provides the commercial harvest in pounds and the sport harvest in number of crab, a more comparable comparison is the commercial catch was 2,647 crab at a 2lb average to the sport harvest of 3,994 crab for sport fish indicating more pressure from the sport fishery than the commercial.

Proposal #201: OPPOSE

SEAFA opposes expanding the closed waters of the Sitka Sound Special Use Area to commercial Dungeness crab fishing. SEAFA opposes additional closures of any commercial fishing grounds where there is not a conservation concern. The area currently provided in the Sitka Sound special use area provides enough opportunity for the community to harvest crab in the summer with no competition from the commercial crab fleet. Based on the Dept's information on the



sport harvest in the area in figure 201-2 RC 2 Staff comments page 284 there is no justification in the request for additional area.

Proposal #202: SUPPORT

SEAFA supports reducing the size of the Tenakee Inlet waters closed to commercial Dungeness crab fishing. The area is larger than needed for a community of 150 residents and with no conservation concern. The area left closed is the more traditional community area to harvest crab.

Proposal #203: SUPPORT

SEAFA supports reopening the Port Althorp Dungeness crab closure to commercial fishermen. There is not a conservation concern of Dungeness crab in Southeast Alaska. The current population based on the most recent census is 134 residents but is a community that increases substantially in the summer months with sport fishermen, lodge customers and both guided and unguided fishing clients.

Proposal #205: OPPOSE

SEAFA opposes closing waters to commercial crabbers in Coffman Cove to the taking of Dungeness crab. SEAFA opposes additional closures of any commercial fishing grounds where there is not a conservation concern. Every time more area is closed even for only a handful of boats, other grounds get more congested causing concern from another community.

Proposal #207: OPPOSE

SEAFA opposes closing waters to commercial crabbers in the Whale Pass area. This area is already closed during the summer crab season to reduce conflicts and is only open during the Oct 1 – Nov 30th fall fishery. Again, there is minimal number of commercial crab fishermen working in statistical area 106-35 as the data is confidential. Additional closed areas just create more congestion somewhere else and an increased potential for localized depletion.

Proposal #208: OPPOSE

SEAFA opposes establishing closed waters in Kassan Bay to commercial Dungeness crab fishing. We are particularly opposed to closing an area only to commercial fishing. If an area needs a closure to provide for local resident use it needs to be a small area where the majority of the community harvest takes place and be closed to sport as well as commercial fishing. Generally, when these communities get the commercial closure, they are disappointed that there really isn't the decrease in pots they expect. This area is already closed during the summer months when locals would most likely be crabbing as the commercial season is only open during the fall/winter season or Oct 1 – Feb 28th.



Proposal #210: OPPOSE

SEAFA opposes establishing a new closed water area in Natzuhini Bay and Sukkwan Strait to commercial Dungeness crab fishermen for all the same reasons in previous proposals. Sea Otters are affecting all users who harvest Dungeness crab. If sea otter rafts have moved into the area, the crab are going to be gone whether there is a commercial fishery or not.

Proposal #211: SUPPORT

SEAFA supports reverting the Sitka Sound Special Use Area back to a fall/winter season of Oct 1-Feb 28th. This would extend the season from Nov 30th to Feb 28th, an additional three months. SEAFA was at the meeting where an individual who serves on the Sitka AC implied they spoke for all of the Sitka AC and convinced the board to shorten the season. There is not a Dungeness crab conservation concern in the Sitka Sound Special Use Area or in Southeast Alaska.

Proposal #212: SUPPORT

SEAFA supports extending the time Dungeness crab pots can be stored in the water from 72 hours to seven days or at least to five days as is in regulation for tanner crab. This will allow more time to safely retrieve pots if poor weather or icing in the winter season becomes an obstacle.

Proposal #213: OPPOSE

SEAFA opposes defining a Dungeness crab pot as circular only. The definition is that a pot has an outside diameter that is not more than 50 inches and is not more than 18 inches high. You put the tape measure along the topside ring whether it is circular or a square pot for the less than 50 inches and the 18 inches high tends to imply that the sides are straight, otherwise a portion of the outside diameter would be larger. We understand that there are a few square pots in use in the fishery. Adopting with proposal would require those fishermen to replace their pots if a circular pot becomes mandatory.

SUBSISTENCE SHELLFISH, COMMERCIAL AND SPORT SHRIMP, OTHER MISC SHELLFISH – GROUP 8

Proposal #171, 172, & 173 – COMMENT

SEAFA has members on both sides of this issue, some wanting a spring fishery so it doesn't cause them to choose whether they are going to go shrimping or Dungeness crab fishing as both seasons start on October 1st. Some want the spring fishery in order to sell shrimp without eggs. We have members who have shrimped when the fishery was still open all year long to commercial harvest. These members point out that harvesting shrimp in the spring and



summer months is a much slower paced fishery than in the fall where the shrimp are faster to the pot. The shrimp freezer burn more often in the summer fishery than shrimp harvested in the fall. When the Prince William Sound fishery re-opened to a spring/summer fishery, we heard from several buyers that they would never buy shrimp from Prince William Sound again because the shrimp are not as firm as the fall fishery in SE. For many fishermen changing to a spring/summer fishery will impact other fisheries they participate in such as herring, and longline, and if you go into the summer far enough Dungeness crab and salmon.

SEAFA questions the Dept's conclusions that a spring fishery would provide increased GHL's. There would only be the benefit in the one year that you change from a fall fishery to a spring fishery, where the fishery doesn't take place in the fall. After that you will still have the amount of harvest taken out of the water based on the GHL set; and you will still have the high mortality period of molting, mating, egg development and extrusion. Whether you catch the female in the fall with eggs or catch the female before it extrudes eggs you are still taking that female out of the fishery. This reasoning does not make sense with what the longtime shrimp fishermen understand about the stock.

In some areas of Southeast, the Dept uses an in-season management model that compares the current years CPUE and size mix of shrimp with past seasons. This data is used to adjust the target catch level in each area that is actively managed. If the season date is changed so that the fishery happens during a different life stage of the shrimp, the baseline data on fishery performance will not be valid and a new baseline will need to be used to evaluate fishery performance. This will slow down adoption of an active management model for this fishery if the season of harvest is changed.

Proposal #174: OPPOSE

SEAFA opposes moving District 2 & 6 to a spring fishery and retaining all other districts to a different schedule. This would create overcrowding and conflict among permit holders with of shrimp fishermen trying to fish the District 2 & 6 fishery and then fishing the fall season in other districts.

Proposal #175: OPPOSE

SEAFA opposes this proposal that has been heard several times before to limit the number of shrimp pots on a string. Limiting the number of pots on a string does not provide for gear standardization between large and small boats, a small boat can put more pots on a string as easily as a large boat, they may not be able to haul as many pots out to the grounds as a large boat, but it doesn't prevent them from setting the appropriate number of pots for the area/ledge they are fishing. Again, limiting the number of pots on a string does not reduce the capture of small shrimp as implied in the proposal.



Proposal #176: OPPOSE

SEAFA opposes reducing the number of shrimp pots. The Dept is able to effectively manage the fishery as it is now configured and with less pots, the pots will be double-picked within a day being less effective in allowing the mesh to sort out the smaller shrimp.

Proposal #177: OPPOSE

SEAFA is opposed to closing a portion of Section 3A around the town of Hydaburg to commercial pot shrimp fishing. If a fishery closure is warranted for the commercial fishery then it should be closed to the sport fishery concurrently. The proposed closed waters is an important district to the commercial fishery and closure of this area will just make other shrimp fishery areas become more congested and even faster paced in taking the GHL in an area causing a closure.

Proposal #178: OPPOSE

SEAFA is opposed to expanding the closed water of Kassan Bay to commercial pot shrimp fishing. If a fishery closure is warranted for the commercial fishery, then it should be closed to the sport fishery concurrently. Closure of this area will just make other shrimp fishery areas become more congested and even faster paced in taking the GHL in an area and causing a closure.

Proposal #179: OPPOSE

SEAFA is opposed to expanding the waters closed to commercial pot shrimp fishing in Twelve-Mile Arm. If a fishery closure is warranted for the commercial fishery, then it should be closed to the sport fishery concurrently. Closure of this area will just make other shrimp fishery areas become more congested and even faster paced in taking the GHL in an area and causing a closure.

Proposal #182: SUPPORT

SEAFA supports ADF&G's proposal to sub-divide District 15 into two separate areas and splitting the GHL between the two sections. This action would help prevent overfishing of the most lucrative shrimp area and allowing a harvest to occur in other parts of the district.

Thank you for the opportunity to comment on these Board of Fish proposals and please feel free to call me (907-465-7666) anytime or email for additional information on our positions for the comments we submitted. We tried to keep our comments as concise and short as possible but is not all the information or knowledge we have on these issues. We will be reaching out to contact you for additional discussions, particularly on stock of concern action plans as we



monitor the COVID situation. Conditions will have to improve greatly before I can risk attending the meeting, although I am registered to attend and testify. I take my responsibility to represent our members seriously but need to weigh out personal health factors also. I hope that you will work with those not present that are generally active at Board of Fish meetings. I have been participating since 1988 but will likely not be attending based on health concerns in today's current COVID status.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen
Executive Director



Marit Carlson-Van Dort, Chairman
Alaska Board of Fisheries
1255 W. 8th Street
Juneau, AK 99811-5526

Re: SEAGO comments on Southeast proposals.

Madam Chair and members of the Alaska Board of Fisheries,

Southeast Alaska Guides Organization (SEAGO) is a regional non-profit trade association working to sustain a healthy guided marine sport fishery in Southeast Alaska. There are roughly 300 businesses in the fishery that contribute to local and regional economies, community tax bases, and create meaningful jobs and livelihoods for Alaskans.

We'd like to comment on several Southeast proposals with summary support/opposition listed first, followed up with detailed comments.

Proposal 82- Oppose without amendments to troll/sport allocation

Proposal 83- Support with bag and annual limits as amended by RC and detailed below

Proposal 85- Support in conjunction with an amended Proposal 82

(85 not needed in conjunction with Proposal 83 which incorporates resident protections)

Proposal 226- Support

Nature of the Southeast Sport Fishery

The Southeast sport fishery plays both a consumptive and recreational role for both residents and non-residents. It's a definite means of food access for locals, and funnels tens of millions of outside dollars annually into the Southeast economy from those willing to pay a premium for the recreational and consumptive opportunity of harvesting their own Alaska seafood.

The sport fishery has a steadier harvest dynamic than other fisheries, not as capable of expanding to capture surplus in high abundance, and less tolerant of loss of opportunity in low abundance. The guided sport industry has the added dynamic of building a clientele base and keeping customer momentum which is susceptible to bouts of poor regulation.

Past management constructs recognized these dynamics, and we encourage the board to keep the nature of the sport fishery in view as it navigates through the current proposals.

King Salmon Management



SEAGO opposes Proposal 82 without amending the troll-sport allocation.

Proposal 82 is a fundamental departure from previous principles of sport management that mitigated swings in regulation from year to year and eliminated inseason management for allocative reasons.

It perpetuates a 2019 withdraw from core objectives when the department drafted a sport proposal out of cycle to address a new payback provision in the Pacific Salmon Treaty. The work was meant as a quick patch until the board could thoroughly flesh out the implications of the new provision and provide clear direction to the department on how to integrate it.

The mechanics of the department's previous proposal and current proposal are in conflict with three of the four core sport management objectives adopted by the board in 2003.

Specifically, they conflict with objectives (1), (2), and (4) of the four core objectives guiding sport fishery management which are to:

- (1) manage the sport fishery to attain an average harvest of 20% of the annual harvest limit specified by the CTC after subtracting the commercial net harvest,
- (2) allow uninterrupted sport fishing in salt waters for king salmon while not exceeding the sport fishery harvest ceiling, (3) minimize regulatory restrictions on resident anglers, and (4) provide stability to the sport fishery by eliminating inseason regulatory changes except those needed for conservation.

[\(ADFG Report to the BOF pg. 13\)](#)

The result is loss of important sport harvest opportunity in low abundance, a potential inability to harvest allocation at high abundance, and challenging and often inaccurate inseason management that destabilizes the fishery.

Objective (1) applied in pre-2019 sport management was meant to temper swings in regulation between abundance tiers. It prescribes bag and annual sport limits that overharvest the average sport target to a degree in low abundance and underharvest it to a degree in high abundance to produce interannual stability while achieving an average harvest target of 20%.

For the 2009-2018 treaty cycle, the realized annual sport percentages were 23.8%, 21.6%, 19.8%, 15.3%, 26.7%, 18.2%, 29.8%, 18.1%, 22.8%, and 16.0%. The final average for the full cycle was 21.2%. [\(ADFG Report to the BOF Table 3, pg. 9\)](#)

Bag and annual limits prescribed in Proposal 82 constrain sport harvest to a hard annual limit rather than applying management consistent with Objective (1).



The bag and annual limit schedule from Proposal 82 below illustrates the effect of switching to a hard annual target on non-resident sport opportunity in low abundance.

Traditionally 1 fish bag limit, 3 fish annual (1/3) because of lack of other species options in June.

Traditionally 1/2 or 1/1 until silvers start showing in mid-July.

ADFG Proposal 82

Non-Resident Bag and Annual Limits
(1/3 = 1 fish bag limit, 3 annual etc.)

Resident

| | | Jan-May | (June 1-15) | (June 16-30) | July | (Aug 1-15) | (Aug 16-31) | Sep-Dec |
|-----|------------|---------|-------------|--------------|--------|------------|-------------|---------|
| TBD | Tier 1 (i) | TBD | | TBD | | | | TBD |
| 1 | Tier 2 (h) | 1/2 | 1/2 | 1/1 | Closed | Closed | 1/1 | 1/1 |
| 1 | Tier 3 (g) | 1/3 | 1/3 | 1/1 | Closed | 1/1 | | 1/1 |
| 1 | Tier 4 (f) | 1/3 | 1/3 | 1/1 | 1/1 | 1/1 | | 1/1 |
| 2 | Tier 5 (e) | 1/3 | 1/3 | | 1/3 | 1/3 | | 1/3 |
| 3 | Tier 6 (d) | 1/4 | 1/4 | | 1/4 | 1/4 | | 1/4 |
| 3 | Tier 7 (c) | 2/5 | 1/5 | | 1/5 | 1/5 | | 1/5 |

In tiers 2-4 ten of twenty years 2001-2020

With regulations subject to inseason adjustments, there are also no guarantees of opportunity as the season progresses. Resident anglers should get protections from closure, but unknown opportunity makes it difficult for non-residents to plan or for businesses that cater to non-resident anglers to market fishing trips.

If the department relies on Proposal 82 as a basis for sport management, we support a sport adjustment from 20% to 25% of the combined troll/sport allocation in tiers (h), (g), and (f), and support incorporating resident protections outlined in Proposal 85.

SEAGO supports Proposal 83 with the following amendments to bag and annual limits:

**SEAGO Proposal 83**

| Resident Bag Limit | Non-Resident Bag and Annual Limits (1/3 = 1 per day/3 annual etc.) | | | | | ADFG Estimated Avg. Sport/Troll Percent | |
|--------------------|---|-----------------|------------------|----------------|--------------|---|--------|
| | | Jan 1 - June 30 | July 1 - July 31 | Aug 1 - Dec 31 | Harvest Est. | Sport % | Troll% |
| TBD | Tier 1 (i) | TBD | TBD | TBD | TBD | TBD | TBD |
| 1 | Tier 2 (h) | 1/3 | 1/2 | 1/1 | 24,750 | 24.1% | 75.9% |
| 1 | Tier 3 (g) | 1/3 | 1/2 | 1/1 | 31,530 | 24.4% | 75.6% |
| 2 | Tier 4 (f) | 1/3 | 1/2 | 1/1 | 39,810 | 21.0% | 79.0% |
| 2 | Tier 5 (e) | 1/3 | 1/2 | 1/1 | 45,530 | 18.5% | 81.5% |
| 3 | Tier 6 (d) | 1/3 | 1/2 | 1/1 | 47,645 | 15.4% | 84.6% |
| 3 | Tier 7 (c) | 1/3 | 1/2 | 1/1 | 52,875 | 15.3% | 84.7% |

Proposal 83 works to keep sport management in compliance with the core objectives set forth by the board since 2003 and provide stable and predictable opportunity to the fishery.

The proposal uses bag and annual limits targeted to attain an average harvest of 20% of the combined troll/sport allocation (objective 1). Managing on average facilitates uninterrupted sport fishing and eliminates inseason management, satisfying core objectives (2) and (4).

The proposal provides protection to resident anglers since there are no closures prescribed or inseason management mechanisms, except those for conservation purposes. It raises the resident bag limits from one fish to two fish in tiers (h) and (g) for the balance of the year where wild stock closures reopen and prescribes a 2-fish resident bag limit in tier (f) where proposal 82 prescribes a 1-fish bag limit.

The same bag and annual limits for non-residents across abundance tiers facilitates expanding resident access as abundance grows while still reducing total sport harvest percentage to target an average 20% harvest. Stable limits across tiers help businesses to reliably market trips in advance.

Mechanically, Proposal 83 reverts to previous troll-sport management in place from 1992-2002 to meet combined troll/sport treaty limits and target an average 20% of combined troll/sport allocation. During this period troll absorbed projected underages and overages of sport harvest annually as described in an ADFG report to the board:

Under the 2000 plan, the commercial troll fishery continued to be managed to harvest the difference between the all-gear catch limit less the net allocation and projected sport harvest. Cumulative sport harvest above the sport fishery allocation came out of the troll allocation and were to be paid back in future

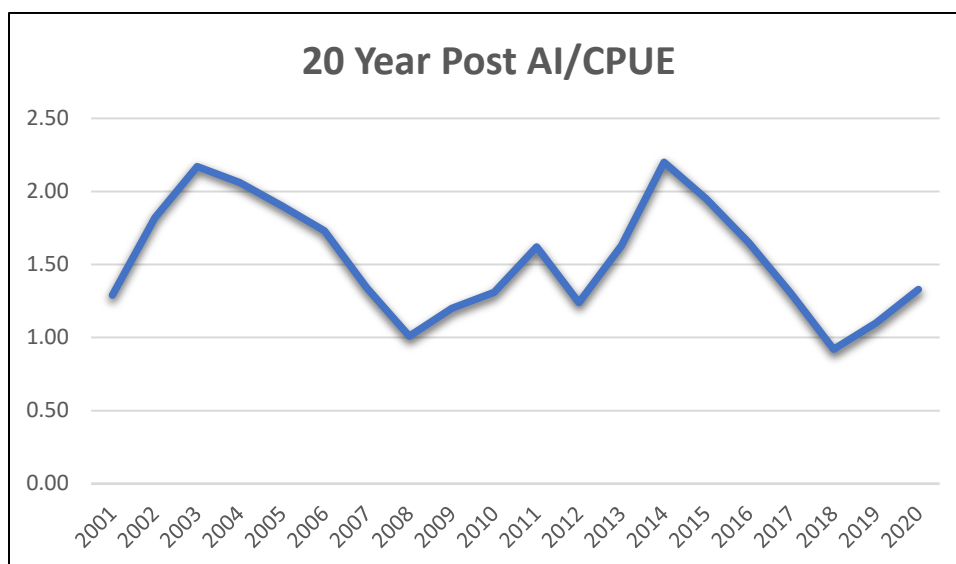


years by not implementing more liberal regulations in the sport fishery, and the cumulative number of fish not harvested (underage) was applied as an offset against excess harvests in prior or future years.

([ADFG Report to the BOF pg. 13](#))

Given the goal of meeting, but not exceeding, the all-gear treaty harvest annually, recoupling troll and sport helps the combined fisheries hit annual allocation goals under new treaty provisions. In 2020, troll received 6000 sport fish that sport anglers couldn't absorb even with successive liberalization of bag and annual limits. As stated by the author in Proposal 81, "The troll fishery is best suited to harvest . . . fish via trip limit fishery or an unlimited opening if numbers warrant. Other fisheries lack the harvesting power and the controlled harvesting ability the troll fleet has on this species." By contrast, sport effort and success is hard to predict and regulate to any degree of precision.

Proposal 83 assumes fluctuation in stock abundance over time. The past two decades illustrate the cyclical nature of aggregate Chinook stocks shown in the following figure for 2001-2020:



Recent ADFG charter harvest, effort, and business data runs requested by SEAGO do not show significant indicators of growth in any of these categories. Charter anglers represent the vast majority of non-resident participants in the Southeast sport fishery. There is no reason to expect that growth in non-resident harvest on charter vessels would be a threat to allocation targets set out by this proposal.

Table 8. Salmon angler days* in Southeast Alaska from ADF&G saltwater logbook data, 2006 - 2020

* A salmon angler day is defined as a record with salmon effort (stat area or hours), regardless of success, PLUS all other records with at least one King Salmon > 28" harvested.

Includes crew and comp anglers

| | Salmon/King Salmon Angler Days | | | | | | | | | | | | | | |
|------------------------|--------------------------------|---------|---------|--------|--------|--------|--------|---------|---------|---------|---------|---------|---------|---------|--------|
| | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
| Southeast ^a | 129,863 | 133,462 | 121,197 | 91,205 | 89,352 | 97,016 | 93,133 | 101,930 | 111,224 | 116,783 | 113,398 | 122,668 | 112,332 | 115,160 | 45,641 |

**Table 6. Active saltwater charter businesses in Southeast Alaska from ADF&G saltwater logbook data, 2006 - 2020**

| | Businesses | | | | | | | | | | | | | | |
|------------------------|------------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
| Southeast ^a | 439 | 430 | 429 | 387 | 373 | 341 | 320 | 301 | 302 | 300 | 309 | 308 | 311 | 314 | 222 |

Table 5. Chinook salmon > 28" harvested in Southeast Alaska from ADF&G saltwater charter logbook data, 2006 - 2020

| | Chinook Kept | | | | | | | | | | | | | | |
|----------------------|--------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
| SEAK Charter Harvest | 56,548 | 49,835 | 20,552 | 25,792 | 26,758 | 39,100 | 26,575 | 25,595 | 53,533 | 50,163 | 45,287 | 34,590 | 16,353 | 21,016 | 21,782 |
| SEAK Troll Harvest | 263,980 | 240,474 | 126,352 | 159,126 | 177,982 | 220,787 | 191,553 | 134,580 | 340,015 | 251,086 | 266,172 | 123,691 | 101,469 | 103,376 | 165,406 |

We strongly encourage the board to weigh the merits of incorporating the four core sport management objectives and the elements of this proposal in restructuring the king salmon management plan moving forward.

Groundfish Management

SEAGO supports Proposal 226

Proposal 226 sets a one fish bag and possession limit for slope rockfish in the Southeast sport fishery.

The proposal would establish in regulation what the department has already done by E.O. for the 2020 and 2021 fishing seasons by separating out slope rockfish and establishing a one fish daily bag limit.

Though the department formerly grouped slope and demersal shelf rockfish together, the two are separated by habitat and there are no conservation concerns with any slope species. Slope rockfish are good table fare and are often caught incidental to fishing for sablefish in deep water. Harvest occurs in state water on the inside passage and largely in federal water along the outer coast because of the close proximity of the slope.



P.O. Box 714
Ward Cove, AK 99928
(907) 220-7630
info@seiners.net www.seiners.net

December 22, 2021

Marit Carlson-Van-Dort, Chair
Alaska Board of Fisheries
P.O. Box 115826
Juneau, AK 99811

RE: Support Proposals: 98, 99, 102, 117, and 123

Oppose Proposals: 97, 101, 103, 106, 119, 120, 121, 124, 136, 156, 157, and 158

Dear Madam Chair Carlson-Van-Dort and Board of Fisheries Members:

Southeast Alaska Seiners Association (SEAS) respectfully submits the following comments for your consideration concerning proposals before the Board at the upcoming Southeast Alaska and Yakutat finfish and shellfish meeting in Ketchikan. SEAS was established in 1968, as the preeminent local, species specific, regionally based commercial fishing association, and has over 120 members.

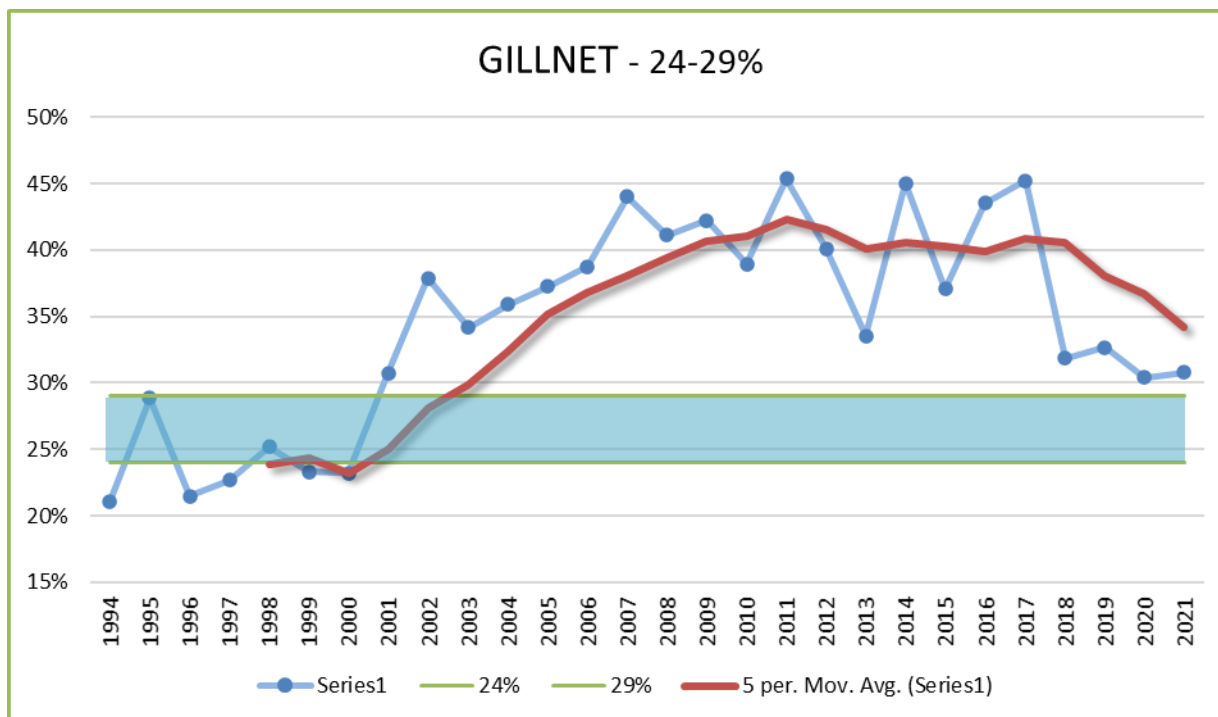
Proposal 97- Oppose

The Regional Associations can choose to allow for exclusive harvest without taking area permanently away from another gear type.

Proposal 98- Support

This proposal seeks to change the time ratio for gillnet to seine openings to 1:2 instead of 2:1 in the Anita Bay Terminal Harvest Area (THA). The gillnet fleet has been above their allocation range for eighteen 5-year rolling average time frames (Table 1).

Table 1. 2021 Allocation Update given at the Joint, Northern & Southern Regional Planning Team Meeting, December 2, 2021. Data from 2020 and 2021 are preliminary. (NSRAA update)



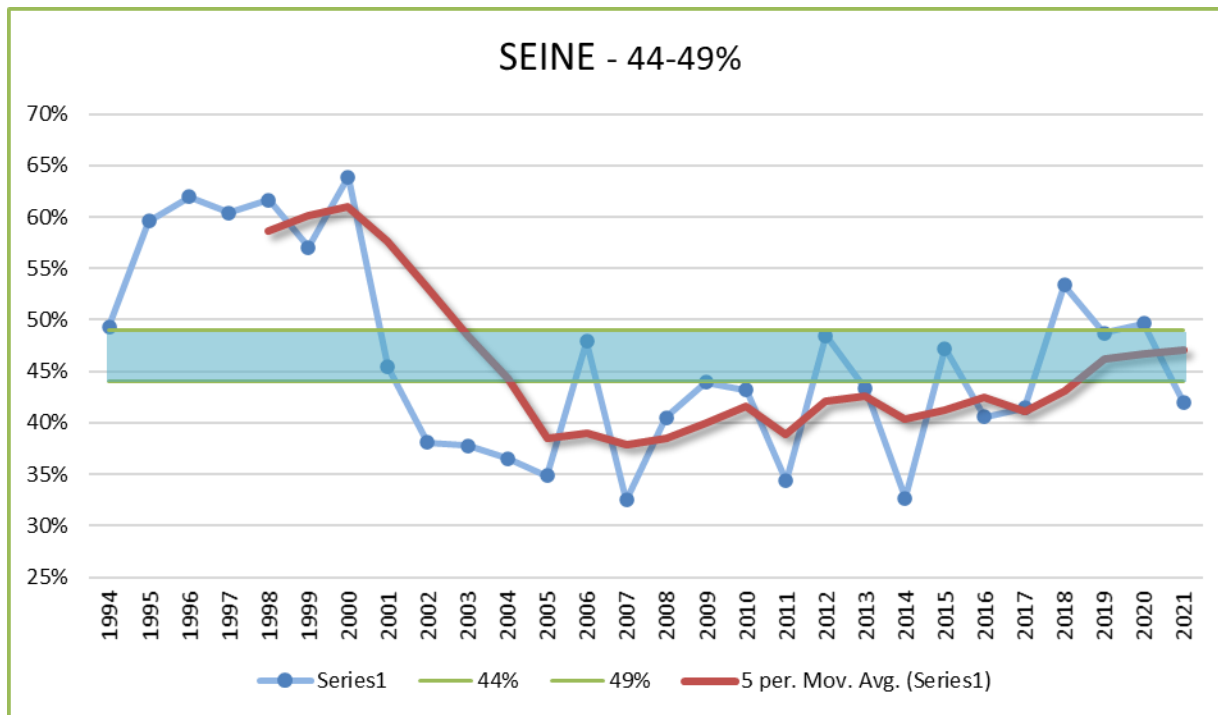
Actions taken by the Board of Fish (BOF) in 2018 to allow equal time in the Anita THA was an attempt to balance that disparity. Due to Southern Southeast Regional Aquaculture's (SSRAA) financial needs, the bulk of the fish returning in 2020 and 2021 were taken for cost recovery (Table 2). The harvest share in 2021 remained at the negotiated ratio of 1:1 by action taken by the BOF when the SE finfish cycle in 2021 was postponed.

**Table 2. Chum harvest in Anita Bay THA- most recent 10-years, fish harvested.**

| Year | Gear Class | | Total | Ratio Gln/Seine | Cost Recovery |
|------|------------|---------|---------|--------------------|------------------|
| | DRIFT | PURSE | | | |
| 2012 | 99,679 | 296,080 | 395,759 | 2:1 | |
| 2013 | 62,668 | 44,153 | 106,821 | 2:1 | |
| 2014 | 50,988 | 30,906 | 81,894 | 2:1 | |
| 2015 | 63,874 | 99,726 | 163,600 | 2:1 | |
| 2016 | 74,638 | 62,099 | 136,737 | 2:1 | |
| 2017 | 50,296 | 105,009 | 155,305 | 2:1 | |
| 2018 | 40,383 | 59,222 | 99,605 | 1:1 | |
| 2019 | 55,121 | 81,177 | 136,298 | 1:1 | |
| 2020 | 17,778 | 6,198 | 23,976 | 1:1 | 68,205 |
| 2021 | 49,945 | 2,999 | 52,944 | 1:1 | 67,703 |

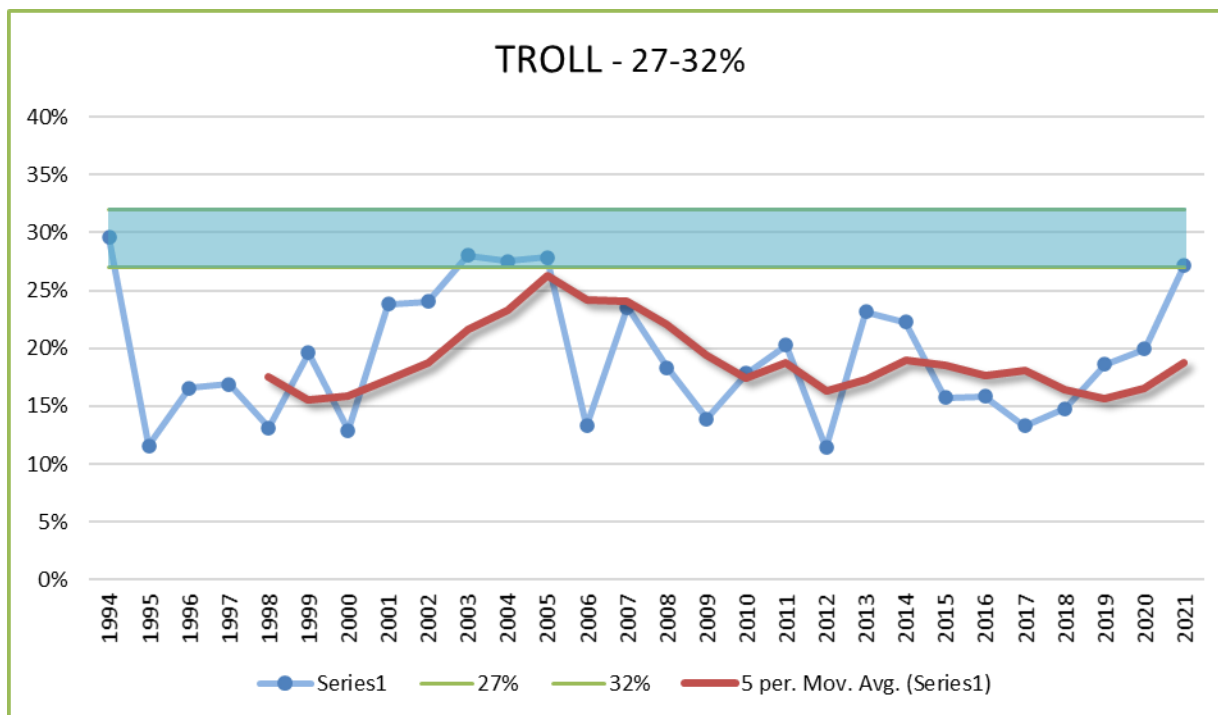
The SSRAA Board has voted to take all the returning chum to this and all their Terminal Harvest Areas (THA) for cost recovery in the 2022 season. Removing Anita and Kendrick Bay's historical terminal harvest from the seine fleets allocation numbers will serve to drive the seine fleet back under their allocation range. One of the tools the BOF has to balance allocation is adjusting time in the THA's. The seine fleet had been under their allocation range for thirteen 5-year rolling average time periods prior to the action in 2018 by the BOF. Since the adjustments in Anita Bay and Deep Inlet were made, the seine fleet is within its allocation range (Table 3).

Table 3. 2021 Allocation Update given at the Joint, Northern & Southern Regional Planning Team Meeting, December 2, 2021. Data from 2020 and 2021 are preliminary (NSRAA update).



Actions taken at the last SE cycle proves that through BOF action, we can effectively make adjustments in the allocation of enhanced fish to better achieve the plans agreement. Even the troll fleet, who has struggled to achieve their allocation since the plans inception, made progress towards that end (Table 4). In essence, all gear groups are moving in the right direction to bring them in alignment with the Allocation Plan. As one troll RPT member commented at the December meeting, the plan is working and it's not broken.

Table 4. 2021 Allocation Update given at the Joint, Northern & Southern Regional Planning Team Meeting, December 2, 2021. Data from 2020 and 2021 are preliminary. (NSRAA update)



Proposal 99- Support

This proposal concerning THA rotations in Southeast Cove, seeks to allocate the excess fish between the seine and troll fleets, while keeping gillnet gear on the books as a tool for future Boards to use. This additional harvest opportunity to the seine and troll gear has worked to bring the seine fleet in their allocation range (Table 5).

Table 5. Harvest History of Southeast Cove THA, In Number of Fish.

Annual harvest of all species by gear group in Southeast Cove THA, 2015–2021*

| Year | Purse Seine ^a | Troll ^a | Cost Recovery Broodstock | Total |
|---------|--------------------------|--------------------|--------------------------------|---------|
| 2015 | — | — | 7,240 | 7,240 |
| 2016 | — | — | 221,111 | 221,111 |
| 2017 | — | — | 46,498 | 46,498 |
| 2018 | — | — | 166,888 | 166,888 |
| 2019 | 39,556 | 659 | 853,017 | 893,232 |
| 2020 | 118,723 | 0 | 4,676 | 123,399 |
| 2021 | 55,934 | | 0 | 55,934 |
| Average | 71,404 | 330 | 185,633 | 216,329 |

^a Common property fisheries began in 2019. * ADF&G data

Proposal 101- Oppose

As the Department points out, this would fall under a different Terminal Harvest Area Management Plan, not Medvejie Creek Hatchery. The Department already considers many of the areas of concern brought up by the proponent through existing policies and the Regional Planning Team (RPT) process. Setting hard triggers based on emotion and not biological information and science, is not how Alaska will continue to have the best managed fisheries in the world. The proposer throws terms like Relative Reproductive Success (RRS) out there with no relevant data, confuses and interchanges straying rates and straying proportions, and references percentage rates that don't exist in policy. A single unprecedented survival rate and subsequent adult return is the impetus for all this perceived need. Fish and Game manages in-season and can adapt to unknowns and nuances that occur that are not predictable. To have such rigid outcomes as defined in this proposal is counter intuitive to how fisheries work, and there is no relevant data to support these triggers as proposed.

Proposal 102- Support

This proposal would seek to change the time ratio for gillnet to seine openings to 1:2 instead of 2:1 in the Deep Inlet THA. The gillnet fleet has been above their allocation range for eighteen 5-year rolling average time frames (Table 1). Again, modifications the BOF made in 2018 went a long way in changing the allocation picture in the right direction (Table 3). If not for the million fish harvest in Deep Inlet by the seine fleet in 2021, they most likely would be out of their current 5-year allocation range (Table 6).

**Table 6. Deep Inlet Harvest Data provided by ADF&G****Deep Inlet THA annual common property chum salmon harvest, 2001–2021.**

| Year | Purse Seine | Drift Gillnet | Troll | Total | Time Ratio Gillnet/Seine |
|-------------|--------------------|----------------------|--------------|--------------|--|
| 2001 | 222,198 | 266,796 | 13,158 | 502,152 | 2:1 |
| 2002 | 118,558 | 186,584 | 637 | 305,779 | 2:1 |
| 2003 | 379,575 | 212,892 | 14,616 | 607,083 | 2:1 |
| 2004 | 629,459 | 421,070 | 10,107 | 1,060,636 | 2:1 |
| 2005 | 410,610 | 432,483 | 32,250 | 875,343 | 2:1 |
| 2006 | 965,713 | 651,689 | 25,488 | 1,642,890 | 2:1 |
| 2007 | 110,348 | 113,546 | 857 | 224,751 | 2:1 |
| 2008 | 322,008 | 213,581 | 4,369 | 539,958 | 2:1 |
| 2009 | 277,492 | 119,719 | 42,994 | 440,205 | 2:1 > 3rd Sunday in June 1:1 |
| 2010 | 802,653 | 296,907 | 20,682 | 1,120,242 | 2:1 > 3rd Sunday in June 1:1 |
| 2011 | 104,626 | 83,581 | 2,841 | 191,048 | 2:1 > 3rd Sunday in June 1:1 |
| 2012 | 333,868 | 183,309 | 12,880 | 530,057 | 2:1 > 3rd Sunday in June 1:1 |
| 2013 | 581,669 | 600,377 | 1,858 | 1,183,904 | 2:1 > 3rd Sunday in June 1:1 |
| 2014 | 590,875 | 278,245 | 5,103 | 874,223 | 2:1 > 3rd Sunday in June 1:1 |
| 2015 | 1,308,994 | 759,080 | 7,558 | 2,075,632 | 2:1 > 3rd Sunday in June = Stat 30 1:1 |
| 2016 | 610,242 | 447,215 | 7,159 | 1,064,616 | 2:1 > 3rd Sunday in June = Stat 30 1:1 |
| 2017 | 750,771 | 352,446 | 4,214 | 1,107,431 | 2:1 > 3rd Sunday in June = Stat 30 1:1 |
| 2018 | 959,896 | 310,642 | 40,848 | 1,311,386 | 1:2 |
| 2019 | 755,947 | 421,556 | 24,114 | 1,201,617 | 1:1 |
| 2020 | 402,142 | 209,899 | 2,624 | 614,665 | 1:1 |
| 2021 | 1,005,592 | 378,644 | 470,325 | 1,854,561 | 1:1 |
| 2011–21 Avg | 554,440 | 330,489 | 35,461 | 920,389 | |

Returns in northern southeast Alaska from Douglas Island Pink and Chum Inc. (DIPAC), contribute almost exclusively to the gillnet fleet. Only when the Amalga Special Harvest Area (SHA) is open, does the seine fleet realize any real benefit from these productions, and it hasn't been open since 2018, and it has only been open a total of 7 years since 1993 (Table 7).

The gillnet fleet has regular access to chum and sockeye in district 111, and chum in district 115. Those numbers are significant and keep the gillnet fleet above their allocation even with ratio adjustments in southern southeast regions. In District 115, the gillnet access to hatchery chum has averaged 500,000 fish but in 2021 was only 115,000. In District 111, the ten-year average is 115,000 harvested sockeye salmon, and the chum return has averaged 430,000 fish historically, with a harvest in 2021 of 183,000. Even with lower harvest numbers in 2021 on these returns, and adjustments to the rotations in Anita and Deep Inlet, the gillnet fleet remains above their allocation range. All this to say that it is a Southeast Allocation Plan, and the southern southeast areas have to make up for the imbalance that is inherent in the northern region of southeast.



Table 7. Historical Amalga Chum Harvest

Amalga SHA - Harvest By User Group- Number of Fish

| Year | Harvest Type | | Total |
|-------|---------------|-----------|------------|
| | Cost Recovery | Seine | |
| 1993 | 149 | | 149 |
| 1994 | 124,994 | | 124,994 |
| 1995 | 304,626 | | 304,626 |
| 1996 | 968,443 | | 968,443 |
| 1997 | 692,592 | | 692,592 |
| 1998 | 508,686 | | 508,686 |
| 1999 | 723,284 | | 723,284 |
| 2000 | 1,342,140 | | 1,342,140 |
| 2001 | 540,112 | | 540,112 |
| 2002 | 1,350,732 | | 1,350,732 |
| 2003 | 1,820,506 | | 1,820,506 |
| 2004 | 1,062,667 | | 1,062,667 |
| 2005 | 246,405 | | 246,405 |
| 2006 | 1,711,785 | | 1,711,785 |
| 2007 | 837,307 | | 837,307 |
| 2008 | 946,429 | | 946,429 |
| 2009 | 1,066,619 | | 1,066,619 |
| 2010 | 1,004,022 | | 1,004,022 |
| 2011 | 1,350,696 | | 1,350,696 |
| 2012 | 842,049 | 411,397 | 1,253,446 |
| 2013 | 1,049,962 | 1,081,913 | 2,131,875 |
| 2014 | 492,784 | 227,048 | 719,832 |
| 2015 | 798,026 | 222,594 | 1,020,620 |
| 2016 | 690,263 | 252,496 | 942,759 |
| 2017 | 555,793 | 513,689 | 1,069,482 |
| 2018 | 346,916 | 328,241 | 675,157 |
| 2019 | 420,664 | | 420,664 |
| 2020 | 204,112 | | 204,112 |
| 2021 | 458,077 | | 458,077 |
| Total | 22,460,840 | 3,037,378 | 25,498,218 |



Proposal 103- Oppose

This proposal seeks to include in statute and regulation trigger points that are not based on any scientific data for the species, variations in environmental conditions, run strength, or relevant information about Alaska's stocks. The industry and the Department realize the importance of having real data about some of the questions and concerns surrounding hatchery production and wild stock interaction and has embarked on a comprehensive multi million dollar set of studies to hopefully answer some of the most pressing unknowns. Until that research is complete, it is premature to develop new regulations based on emotion and fear.

Proposal 106- Oppose

We support the larger THA for increased troll access to these Chinook, but oppose the addition of gillnet gear to a non-traditional gillnet area. Whether or not the troll fleet will have increased opportunity is yet to be seen. These fish were moved out of Neets Bay because the troll fleet had very limited access to them in these times of *Wild Stocks of Concern* surrounding Chinook in the Behm Canal corridor. Having the net fleets realize the bulk of the return does not help the allocation picture, and is not who these Chinook were intended to benefit.

Proposal 117- Support

If the F&G Department and Enforcement can sign off that this is manageable for them to implement, we are in support of alternative ways to make the troll fleet more efficient at accessing chum, especially without the need for expanded area that can be problematic in some areas of high chum abundance.

Proposal 119 and 120- Oppose

In essence this gives the gillnet fleet access to a huge area they didn't have access to before. It is sold as pink salmon access, when in reality it is access to hatchery chum salmon in a non-traditional area. When the gillnet fleet is already above their allocation range, we fail to understand how this honors that agreement.

Proposal 121- Oppose

This is a non-starter. Closing a traditional commercial area because some new charter boats, and or sport boats, have no knowledge of the area or understanding of the fishery, is quite simply, offensive. The gillnet fleet has offered their local knowledge and expertise in Coffman Cove to this group, but has had no takers.



Proposal 123- Support

Proposal 124- Oppose

Proposal 122- Hawk Inlet 15,000 sockeye cap through July 22, remove sunset dates

Proposal 123- Hawk Inlet 15,000 sockeye cap through July 15, remove sunset dates

Proposal 124- Hawk Inlet 15,000 sockeye cap through all of July, remove sunset dates

All proposals, and the Department, support removing the sunset provision of this plan. As more genetic information has come available and with the addition of enhanced sockeye in the catch, adjustments have been made at various BOF cycles to address the desire to improve access to Taku River and Lynn Canal origin pink salmon runs while addressing sockeye concerns. In 33 years, only three times has this area been open in the last week of July. It makes no sense to apply a catch limit to a time frame that has been open less than 10% of the time. This was acknowledged at the 2018 board cycle, and the date the sockeye cap covered was shortened to July 22. Since the July 22 date change, the seine fleet has harvested 2,202 and 1,567 sockeye salmon in total in 2018 and 2020 respectively.

Hawk inlet has only been open 16 of the 33 years of the plan, so half the time. In essence the 15,000 yearly cap is only fished every other year, so the yearly average harvest is far below the 15,000 cap at just over 5,000 fish. Even using the average catch for just the years the area is open gives a harvest average of under 10,000 fish (Table 8). Reducing the time period the cap covers, will enable managers the flexibility to harvest pink salmon in years of high abundance or if the run is later than normal. Under this regulation, openings are dependent on the abundance of early run pink salmon and the conservation of all stocks - ***(1) "... open areas and times must consider conservation concerns for all species in the area;"***. The Department uses this language every year to restrict fishing time, without the sockeye triggers. We understand that some allocative language is helpful to guide fisheries managers, and would suggest the July 15th time frame would do just that.



Table 8. Hawk Inlet Test Fishery harvest numbers – ADF&G Data

**D112 Hawk Inlet shoreline fishery harvests of sockeye and pink salmon, north of Point Marsden in July
subject to SAAC 33.366 Northern Southeast seine salmon fishery management plan**

| Year | SW 27 | | SW28 | | SW29 | | SW30 | | SW31 | | Totals | |
|--------------------|--------------|---------|--------------|---------|--------------|-----------|--------------|-----------|--------------|---------|--------------|-----------|
| | wild sockeye | pink | wild sockeye | pink | wild sockeye | pink | wild sockeye | pink | wild sockeye | pink | wild sockeye | pink |
| 1989 | | | 3,595 | 113,577 | 11,437 | 558,013 | | | | | 15,032 | 671,590 |
| 1990 | | | | | | | | | | | - | - |
| 1991 | | | | | | | | | | | - | - |
| 1992 | | | | | | | 12,529 | 218,873 | | | 12,529 | 218,873 |
| 1993 | | | | | 6,120 | 80,471 | | | | | 6,120 | 80,471 |
| 1994 | | | | | 7,061 | 283,239 | 3,262 | 125,674 | | | 10,323 | 408,913 |
| 1995 | | | | | | | | | | | - | - |
| 1996 | | | | | | | | | | | - | - |
| 1997 | | | | | | | | | | | - | - |
| 1998 | | | | | | | | | | | - | - |
| 1999 | | | | | | | 5,876 | 597,674 | | | 5,876 | 597,674 |
| 2000 | | | | | | | | | | | - | - |
| 2001 | | | | | 10,579 | 194,624 | | | | | 10,579 | 194,624 |
| 2002 | | | | | | | | | | | - | - |
| 2003 | | | 5,623 | 81,120 | 2,719 | 97,099 | | | | | 8,342 | 178,219 |
| 2004 | | | 3,427 | 216,307 | 14,063 | 408,936 | | | | | 17,490 | 625,243 |
| 2005 | | | 1,561 | 356,744 | 6,204 | 1,093,974 | 2,307 | 257,996 | | | 10,072 | 1,708,714 |
| 2006 | 4,499 | 120,057 | 2,557 | 84,884 | 3,177 | 105,927 | 1,128 | 28,829 | | | 11,361 | 339,697 |
| 2007 | | | | | | | | | | | - | - |
| 2008 | | | | | | | | | | | - | - |
| 2009 | | | | | 4,132 | 301,041 | 3,543 | 260,853 | 6,558 | 943,514 | 14,233 | 1,505,408 |
| 2010 | | | | | | | | | | | - | - |
| 2011 | | | 2,707 | 439,606 | 8,247 | 826,703 | 9,286 | 1,234,091 | | | 20,240 | 2,500,400 |
| 2012 | | | | | | | | | | | - | - |
| 2013 | | | | | | | | | 1,690 | 346,476 | 1,690 | 346,476 |
| 2014 | | | | | | | | | | | - | - |
| 2015 | | | | | 1,035 | 193,534 | 1,874 | 405,524 | 7,674 | 830,239 | 10,583 | 1,429,297 |
| 2016 | | | | | | | | | | | - | - |
| 2017 | | | 2,209 | 173,821 | 1,767 | 269,566 | 9,034 | 570,623 | | | 13,010 | 1,014,010 |
| 2018 | | | | | | | | | | | - | - |
| 2019 | | | | | 1,139 | 20,599 | 1,063 | 14,573 | | | 2,202 | 35,172 |
| 2020 | | | | | | | | | | | - | - |
| 2021* | | | | | | | 1,567 | 74,007 | | | 1,567 | 74,007 |
| Ave All Years | | | | | | | | | | | 5,189 | 361,478 |
| Ave For Open Years | | | | | | | | | | | 9,802 | 682,793 |

* In 2021 the wild sockeye salmon harvest limit in SAAC 33.366 applies through July 22nd. All other years through the month of July

Proposal 136- Oppose

It is not clear what the real intent of this proposal is, but commercial fishermen have always been able to retain salmon for personal use as long as it is accounted for on a fish ticket. It makes no sense that a commercial fisherman would have to “purchase back” some of their own catch so they had fish to feed their families.

Proposals 156, 157, 158 – Oppose

The Sitka Sound commercial sac roe herring fishery harvest plan already uses a sliding harvest rate based on forecasted biomass that is considered conservative by the best scientific data. Reducing harvest rates at the lower forecasted biomass estimates is un-necessary to protect



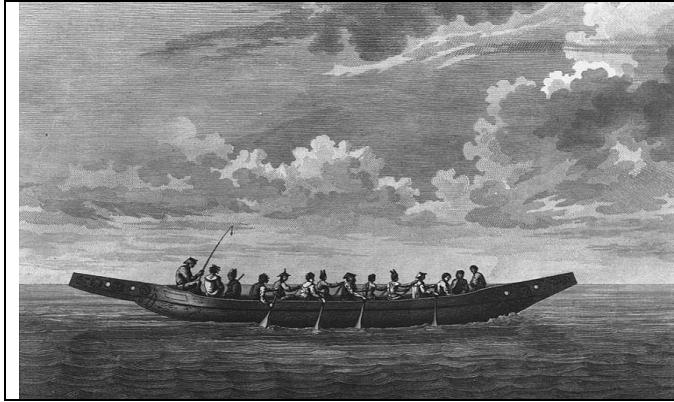
the run and provide for future subsistence and commercial harvests. Exploitation rates on different age classes are already accounted for in the current harvest strategy employed by Fish and Game. The Department uses the best available science and has spent numerous years modeling age class structure and biomass indicators of this stock to provide the best data available to guide this fishery and provide for traditional subsistence harvest.

Thank you for your consideration of our comments regarding these proposals. Myself and Board members will be available during the meetings should you wish to discuss these or other proposals.

Respectfully,

A handwritten signature in blue ink that reads "Susan Doherty".

Susan Doherty
Executive Director SEAS



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

December 1, 2021

ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

ALSO VIA EMAIL: dfg.bof.comments@alaska.gov

**RE: COMMENTS ON THE 2020-2021 ALASKA BOARD OF FISH PROPOSALS FOR
SOUTHEAST AND YAKUTAT FINFISH AND SHELLFISH**

To the Board of Fish:

The Southeast Alaska Subsistence Regional Advisory Council (Council) represents Federally qualified subsistence users. One of the Council's duties is to review resource management actions that may impact critical subsistence resources. The Council, during its last three meetings (October, 2020, March, 2021, and October, 2021) formulated comments on the following Alaska Board of Fisheries (BOF) proposals and submit them here for your consideration:

King Salmon Proposals:

Proposal 93: SUPPORT. This proposal is similar to two proposals submitted by this Council, except that this proposal specifically addresses king salmon. The impacts of sportfishing on king salmon are tremendous. This proposal, along with the Council's proposals 143, 145, and 234, would assist in obtaining information necessary to make management decisions that would reduce competition between nonresidents and subsistence users.



Personal Use/Sport/Subsistence Proposals:

Proposal 125: SUPPORT. The Council submitted this proposal with the intent to remove the prohibition of receiving a salmon harvest permit, while making it clear that king salmon cannot be harvested for subsistence on the Taku and Stikine River drainages. (A Federal Chinook subsistence fishery exists on the Stikine River and the Taku fishery is closed under Federal regulations)

Proposal 127: SUPPORT. There is currently no conservation concern of this species in Yakutat Bay so this net tending requirement should be repealed. It is unfair and ineffective to place a net tending restriction on subsistence users who are catching one Chinook when the same net tending requirement is not in place for the commercial fishery, where harvests are much higher. Subsistence users should not be the first group to be restricted nor bear the brunt of conservation measures. The current net tending requirement is detrimental to subsistence users.

Proposal 128: SUPPORT. The Council submitted this proposal to provide an additional and effective method of harvesting salmon for subsistence users while maintaining the ability of resource managers to use permit restrictions to address site specific issues. The current regulation prohibiting set gillnets is unnecessarily restrictive to subsistence users.

Proposal 129: SUPPORT WITH MODIFICATION. The Council supports this proposal to provide opportunities to harvest Coho, but with modification to move the opening date to August 31 so as not to affect the sockeye run. This proposal would not affect Federal regulations in freshwaters.

Proposal 130: OPPOSE. The Council opposes opening this fishing area that is critical to protect sockeye salmon. Available data shows that the overall trend for sockeye runs in the Klawock system has been severely depressed in the last decade and, although there are indications of some improvement in escapement, it is too risky to liberalize sockeye harvest until there are significant healthy returns. The Council has previously supported the closure above the bridge. Efforts should be made to restrict other user groups from catching this system's sockeye from this system. All user groups should share in conservation efforts. Restrictions solely placed on subsistence users does not allow for a meaningful subsistence priority.

Proposal 131: SUPPORT. The Council supports modifying the fishing area and adding hand purse seine as legal gear for the Redoubt Bay subsistence salmon fishery to provide additional opportunities for harvest. This could increase the area for harvesting while maintaining gear type separation. Relocating the line for commercial harvesters should be considered to allow for more space between user groups. The addition of purse seine gear addresses the challenge of fishing in an area of steep beaches. This proposal would make it easier for people to use the community harvest permit and would help subsistence users meet their harvest needs. There is no conservation concern due to healthy escapement.



Proposal 133: SUPPORT. The Council supports allowing the use of seine and gillnet as subsistence gear types in the waters of Redoubt Bay that are open to commercial salmon fishing because it would allow subsistence users to use these in areas that already allow for commercial salmon fishing. Further, it would help clarify the Redoubt Lake sockeye management plan and provide additional access to salmon by subsistence users.

Proposal 134: OPPOSE. The Council opposes moving this permit stipulation to regulation. Current requirements on state permits address the issue with more flexibility than would a State regulation.

Proposal 142: SUPPORT. The Council supports this proposal to provide a limited harvest of Eulachon in lieu of continuous closures. It would also provide some monitoring information. The Council recommends that the regulation make reference to 'a limit of five gallons' versus a '50 pound limit' to allow an easier way to measure the harvest.

Proposal 143: SUPPORT. The Council submitted this proposal to require in-season reporting of nonresident sport fish harvest for accountability. Subsistence users have been experiencing a more difficult time competing for and harvesting fish and shellfish. The Council believes that unguided non-resident sport fishermen are taking multiple daily harvest limits and that harvest limits for unguided non-residents are not well enforced nor are they accurately reported, since non-resident unguided fishermen do not have to record details about their harvest. Currently, there are stricter reporting requirements on subsistence fishermen. Additional data gathered from nonresident sport fishers would help determine if there is an increase in competition between user groups.

Proposal 144: SUPPORT. The Council submitted this proposal to establish a logbook program for rental vessels for the same reasons it submitted Proposal 143 – to gather additional data from nonresident sport fishers to aid in management of resources harvested by all user groups.

Proposal 145: SUPPORT. The Council submitted this proposal to address concerns with nonresident bag and annual limits. This proposal is specific to Coho and Sockeye salmon, the primary species targeted by subsistence users. Under current general regulations, non-resident sport fisherman may take six Coho and Sockeye salmon per day, every day of the season. In contrast, an entire household of subsistence users typically may only harvest an annual limit of 20-50 fish from each of a limited number of sites. The proposed changes would put a ceiling on the annual harvest of each species by nonresidents that is roughly comparable to the limits placed on subsistence households. The Council believes that the proposed limits on non-resident harvest are adequate to allow ample sport fishing opportunity for visitors, while preventing excessive non-resident sport harvest of species important to subsistence users.

Proposal 161: OPPOSE. The Council opposes this proposal that would require a subsistence fishing permit to harvest herring roe on branches in the Sitka Sound area. This is an unnecessary burden for subsistence users who have such a limited harvest capability.



Proposal 170: SUPPORT. The Council supports this proposal establishing a positive customary and traditional use finding for shellfish and plants for all intertidal areas of Southeast Alaska and Yakutat. The Council recognizes that for subsistence users “when the tide is out, the table is set.” This is an important first step in getting protection for subsistence uses of beach resources used since time immemorial, including those specifically mentioned in the proposal, but also kelp and abalone. These resources are important for harvesters to feed their families and would provide positive protection under state regulation for subsistence uses. Impact Statement: Regarding climate drivers and factors that could pose a threat to these resources, including any commercial industries made on these resources, the Council highly encourages discussions with subsistence users on how these issues and activities impact them before any decisions are made for the management or permitting on these resources.

Proposal 177: SUPPORT. The Council supports this closure for commercial shrimp fisheries based on the drastic decline (historic lows) in shrimp resources near Hydaburg. These closures would protect the resource from commercial fishing in a small area near the community. There is pressure on this resource due to competition from multiple arenas (including sea otters). Any loss of area to commercial fishing would be small with limited impacts. This proposal would be effective and assist the community of Hydaburg to meet subsistence needs while protecting the resource and allowing the stock to rebuild.

Proposal 210: SUPPORT. The Council supports the closure of the commercial crab fishery near Hydaburg. Based on local testimony, the Council understands that predation has devastated the Dungeness crab stocks. This closure is necessary to preserve customary and traditional uses for this resource. Closing a small commercial harvest area is needed so that the people of Hydaburg can meet their harvest needs.

Miscellaneous Statewide Sport Shellfish Proposals:

Proposal 234: SUPPORT. The Council supports this proposal requiring inseason reporting of nonresident sport fish harvest (fish and shellfish). Subsistence users are experiencing more challenges in meeting their harvest needs because of the competition with nonresident sport fishermen. There is a concern that the daily and annual harvest limits for unguided non-residents are not well enforced nor are they accurately reported. It is important to capture not only what is kept by the fisherman, but what and how much is caught and released. This proposed requirement would provide additional data from nonresident sport fishers to assist in the overall management of these critical resources.

Proposals 235/236: SUPPORT. The Council supports these proposals to modify the definition of “domicile” and add it to sport fishing regulations. The Council reiterates the importance of the accountability of nonresidents taking fish in Alaska. Consistent with earlier comments, this proposal would assist in reducing competition between nonresidents and subsistence users.



The Council appreciates the opportunity to convey its support and concerns about the effect of these proposals. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-209-7817, dlperry@usda.gov.

Sincerely,

Donald Hernandez
Chair

cc: Federal Subsistence Board
Southeast Alaska Subsistence Regional Advisory Council Members
Sue Detwiler, Assistant Regional Director, Office of Subsistence Management
Robbin LaVine, Policy Coordinator, Office of Subsistence Management
Katerina Wessels, Council Coordination Division Supervisor,
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Amea Howard, Acting Fisheries Division Supervisor, Office of Subsistence Management
Lisa Grediagin, Wildlife Division Supervisor, Office of Subsistence Management
Jonathon Vickers, Anthropology Division Supervisor, Office of Subsistence Management
Tom Kron, Statewide Support Division Supervisor, Office of Subsistence Management
Greg Risdahl, Subsistence Program Leader, Alaska Region 10, USDA – Forest Service
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-229-2478

December 20, 2021

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
<https://www.adfg.alaska.gov/index.cfm?adfg=process.comments>

RE: Comments on herring proposals for Southeast Finfish Meeting--Jan. 4-Jan. 15, 2022

Chair Van Dort and Board Members,

The Southeast Herring Conservation Alliance (SHCA) is a 501 (c)(6) nonprofit organization that represents the interests of herring fishermen, processors, tender operators, crew, pilots, support businesses and families associated with herring fisheries throughout Southeast Alaska. SHCA members participate in the Sitka Sound herring sac roe fishery and other Alaska fisheries. SHCA members and supporters are committed to the sustainable harvest and management of the herring resource so all users can benefit into the foreseeable future.

SHCA offers comments on the following proposals:

Support for proposals 159, 160, 161, and 233.

Opposition to proposals 156, 157, 158, and 167; and,

Comments for consideration on issues related to SE herring proposals 163, 164, 165.

SHCA members and supporters have participated in Board of Fish meetings and Work Sessions for issues related to herring for decades. In addition to attending meetings of the Board of Fish (BOF), members have also participated in Federal Subsistence Board meetings that have considered SE herring management issues. A common theme with proposals at these meetings has been the Sitka Tribe of Alaska (STA) efforts to curtail or eliminate the commercial sac roe fishery under the guise of protecting subsistence users. While restrictions of the commercial fishery have been implemented in many BOF meetings, the same anti-commercial proposals have been recycled and expanded by STA year after year in an apparent attempt to further reduce and eventually eliminate the commercial fishery. Sitka herring permit holders and other stakeholders hope to continue participation in harvest of scientifically determined surplus herring stocks that are



available for commercial harvest through the conservative, responsive and time-tested management plan that has evolved since the inception of the sac roe fishery in the 1970s.

SHCA members and supporters FULLY support subsistence users' priority while maintaining State of Alaska management control. Most permit holders in the Sitka herring sac roe fishery are Alaska residents--some are also indigenous, and many are subsistence harvesters themselves who rely on strong, science-based management of fisheries resources for cultural and financial sustenance. SHCA members and stakeholders in the fishery all hope to continue participation in harvest of surplus herring stocks managed conservatively and sustainably with a responsive and time-tested plan that has evolved through the years of successful ADF&G stewardship. Although STA proposals often have the stated goal of creating reasonable subsistence opportunity, the apparent purpose seems more oriented toward wresting control of the fishery from the State of Alaska.

Proposal 159: SUPPORT - Repeal this regulation related to management of the commercial sac roe herring fishery in Sitka Sound. SUPPORT

This proposal submitted by SHCA seeks to eliminate unnecessary controversy related to the 2002 promulgated regulation. It was reinterpreted by STA lawyers in 2018 and used as a basis for their legal complaint against the Board of Fish and the department. Other regulations (5AAC27.160 and 5AAC27.190), establish clear and sufficient guidance to the department for management of the commercial sac roe fishery to assure reasonable subsistence opportunity. In addition, establishment of a 'core' subsistence area and gratuitous increase of the biomass threshold by 5,000 tons over a department recommendation of 20,000 tons has made 5 AAC 27.195 superfluous. Repeal of this regulation would lower the State's legal burden and costs associated with maintaining state management and commercial access to the state's herring resources while not compromising any aspect of subsistence harvest opportunity.

2018 STA Lawsuit Synopsis:

December 11, 2018: STA filed suit in the Alaska Superior Court alleging three broad complaints for relief against the BOF and the department concerning subsistence and commercial management of the Sitka Sound herring stocks. STA claimed that the Board and department had:

1. Acted in violation of the subsistence priority statute AS 16.05.258;
2. Violated the common use and sustained yield clauses in article VIII, Sections 3 and 4 of the Alaska Constitution, and;
3. Had violated the Administrative Procedures Act, AS 44.62

January 23, 2019: The court granted Southeast Herring Conservation Alliance (SHCA) motion to intervene on the side of the state.



February 20, 2019: The Superior Court denied the Tribe's motion for a preliminary injunction which sought to close the 2019 sac roe fishery. The court held that the Tribe had failed to demonstrate irreparable harm if the fishery went forward and had failed to make a clear showing of success on the merits of their complaint(s).

March 27, 2019: The Alaska Supreme Court denied the Tribe's petition for review of the Superior Court decision.

March 31, 2020: The Superior Court granted partial summary judgement in favor of the Tribe on their claim that the department had failed to implement 5 AAC 27.195(a)(2). **The court did not find that the department had failed to comply with the substance of the regulation, only that it had not provided adequate explanation of its decision-making.**

November 30, 2020: The Superior Court granted partial summary judgement in favor of the Tribe on their claim that the department had failed to implement 5 AAC 27.195(b). **As in the previous decision, the court did not find that the department had failed to comply with the regulation, only that it had not provided adequate explanation of its decision-making.**

Note: The Tribe has publicly asserted that the above partial summary judgements were great victories in their efforts to bring about fundamental change in management of the sac roe fishery in Sitka Sound. The department has complied with the court rulings by undertaking a process to better document its consideration of subsistence concerns when managing the commercial fishery.

July 2020: The Tribe abruptly dismissed all its claims against the Board.

March 22, 2021: The Tribe's remaining claim, that the department had violated the Sustained Yield Clause of the Alaska Constitution by failing to use the 'Best Available Information (BAI) in providing advice to the board at the January 2018 regular cycle meeting and the October 2018 and 2109 work sessions was struck down by the court for multiple reasons.

May 24, 2021: With all STA's issues resolved, the Court granted final judgement. The Tribe has since appealed to the Alaska Supreme Court alleging that the trial court erred in three respects: (1) Denial of the preliminary injunction motion; (2) granting of summary judgement on the Sustained Yield claim; and (3) the court's refusal to designate them as the prevailing party. The appeal is ongoing.

Proposal 160: SUPPORT - Reduce closed waters in the Sitka Sound commercial sac roe herring fishery.

This SHCA proposal would reestablish the 'core' subsistence area boundaries set up in 2012. The Board granted a major expansion of the 'core' area in 2018 with little



justification or evidence of its efficacy in providing reasonable subsistence opportunity. Given that the herring spawn of 2019 and 2020 centered around Kruzof Island and at least partially bypassed the core areas, subsistence harvesters demonstrated that they had ‘reasonable opportunity’ to access the stocks outside of those designated core areas without undue hardship.

According to Table 9 of the 2021 Subsistence Harvest Report, 87% of the thirty-eight responding households reported that they got enough for themselves and enough to share with others. Table 7 of the 2021 report indicates that the largest subsistence harvests were taken outside of the ‘core’ area—an indication that the commercial operation did not compromise subsistence opportunity. In 2020 the fleet voluntarily stood down and there was no commercial fishery due to market conditions and concerns related to the COVID-19 pandemic. For that same year, table 7 of the department’s subsistence report indicated that 66.7% of subsistence harvesters took enough for their own use and 100% had enough to meet their sharing obligations. The 2019 subsistence report indicated that, while harvests were low due to the remote location of the major spawn events—outside of the ‘core’ area—77% of the harvesters got enough to share and 62% enough for their own use.

Overall, subsistence harvesters have had reasonable opportunity to meet their expectations despite traveling outside of the ‘core’ area, and that operating in areas also used by the commercial fishery is not an impediment to success.

The Board has frequently acquiesced to STA proposals that restrict the commercial fishery under the guise of underachievement of the Amount Necessary for Subsistence (ANS). Under AS 16.05.258(1)(A) Subsistence Use and Allocation of Fish and Game, “[the Board] *shall adopt regulations that provide for reasonable opportunity for subsistence of those stocks or populations*”. The statute does not specify any obligation to manage for achievement of a specific harvest amount. In this case, information available from the department’s Subsistence Division reports, indicates that the subsistence fishery clearly “...*provides a normally diligent participant with a reasonable expectation of success...*” (AS 16.05.258(f)). SCHA is not seeking to reduce subsistence harvest or curtail opportunity. We are supportive of efforts to ensure that subsistence harvest is not compromised by commercial fishing activities while also allowing for commercial fishery to take place. This proposal allows both commercial and subsistence harvesters to successfully conduct their respective operations.

Proposal 161: SUPPORT - Require a subsistence fishing permit to harvest herring roe on branches in the Sitka Sound area.

This proposal, submitted by SHCA would establish a permit or registration system for harvest of herring roe on branches. Since many if not most other subsistence fisheries in Southeast and throughout the state require a permit to operate and collect verifiable harvest data, it seems as though it is not an undue burden to require one in a place as unrestricted, confined in area, and convenient as Sitka Sound. The roe on branches subsistence fishery is limited by the timing of spawn, weather, other issues unrelated to



the commercial harvest, and—most critically--the effort expended to harvest the product. **There is no limit on the amount that can be harvested for subsistence use.** Nonetheless, this proposal has been consistently and adamantly opposed by STA despite potentially improved data collection and harvest accountability.

Proposal 233: SUPPORT - Remove districts 13-A and 13-B from Northern Southeast herring spawn on kelp pound fishery administrative area.

This SHCA proposal was submitted as an attempt to stave off conflict between limited commercial groups G01A and L21A if other regulations that allow for alternate uses of the Sitka Sound herring stocks are promulgated. While this proposal alone does not resolve issues related to conflicts inherent in allowing for alternate harvest means, it eliminates one area of conflict and deserves support as a way to increase number of regulatory tools available in the toolbox for consideration by this Board and or future Boards.

OPPOSE – STA Proposals 156, 157, and 158. Proposal 156 to modify harvest rate control rule for Sitka Sound sac roe herring fishery; Proposal 157 to modify harvest rate for Sitka Sound commercial sac roe herring fishery based on forecasted age structure; and, Proposal 158 to incorporate forecasted age structure into Sitka Sound commercial sac roe herring fishery spawning biomass threshold.

These three similar and slightly reworked proposals from STA have been all been reviewed, discussed, and rejected by previous Boards since at least 2002. Reversing the decisions of so many previous Boards can only be justified by a major change in herring population dynamics that is not at all indicated by the present observed and predicted stock status. The current management plan is time-tested, responsive to stock size changes, conservative, uses the best available management science, and provides for a subsistence priority while allowing for reasonable conduct of commercial and subsistence fisheries. Any changes to the peer reviewed and time-tested model for managing and forecasting herring stocks in Sitka Sound should be initiated by the department as the agency constitutionally responsible for sustainable fishery management.

Participants in the commercial sac roe fishery attempt diligently to selectively harvest the older age class fish. However, the commercial harvesters largely fail at this goal as shown by department sampling and industry statistics. The STA claim that older fish are at a critical risk as suggested in proposals 157 and 158 is clearly a ‘red herring’. The analysis using age 3-4 fish to calculate excessive harvest rates on older fish--as noted in Proposal 157--is deceptive if not disingenuous since a sizable portion of the younger fish are typically immature and are not even available to the sac roe fishery. Other STA contentions that they present as factual in these proposals, such as fealty to spawning locations, are not backed up by observable data and known herring behavior. Another justification listed in STA proposals 156 and 157 is that subsistence harvesters are unable to “...meet their needs”, rather than the specific statutory requirement to provide for ‘reasonable opportunity’.



Overall, these proposals from STA are rife with inaccurate unsubstantiated statements, fail to acknowledge historic genesis of the harvest rate percentages incorporated in the management plan and have all been subject to intense review by previous boards without modification. Please take no action or reject these proposals outright.

Proposals 163 and 164: NEUTRAL (comments provided for consideration), Establish equal share quotas for the Sitka sac roe purse seine fishery.

SHCA has remained neutral on these proposals for establishing an equal split fishery for sac roe, as this issue is best decided on by individual permit holders. Most of our members favor this idea. We support Board consideration of an equal split management system to help improve safety in the fishery, increase cooperative behavior by the fleet to maximize roe quality, and to minimize impacts to other users of the herring resource.

Proposal 165: NEUTRAL (comments provided for consideration), Allow G01A permit holders to harvest unharvested Sitka sac roe GHL for food and bait.

Although this proposal is appealing to many G01A permit holders, there are issues related to food and bait fishery participants that preclude full support. We look forward to listening to public testimony and the committee process to help elucidate the issues.

Proposal 166: OPPOSE, Create an open pound herring spawn on kelp fishery in Sitka Sound.

Although this may be an attractive proposal for some G01A permit holders, the jurisdictional issues as noted in Proposal 233 and potential subsistence fishery conflicts preclude support for this proposal.

Proposal 167: OPPOSE, Redefine the boundaries of the Hoonah Sound spawn-on-kelp fishery (13-C) and the Sitka sac roe fishery (13-A/B).

Given that this is a clear resource grab attempt by an L21A permit holder that compromises traditional G01A access to the area, SHCA strongly opposes this proposal.

Concluding Remarks

In closing, thank you for the opportunity to submit written testimony on behalf of SHCA. SHCA members and supporters will be at the meeting to testify and participate in the committee process. Although G01A permit-holders recognize, support, and advocate for the statutory priority for subsistence use of the state's fishery resources, we have been unable to find common ground with STA despite considerable effort to do so. Well intentioned efforts by the Board of Fish and SHCA to appease STA have met with their continued actions at the Board level, through the Federal Subsistence Board, and the Courts to further wrest control of the fishery from state management and compromise opportunity for commercial sac roe harvest. We hope that the proposals submitted by



SHCA allow reasonable and realistic appraisal of the issues and hope to assist the Board in understanding the Sitka Sound herring management plan, its genesis and unique conservative, sustainable, responsive, time-tested, and scientifically based characteristics.

Sincerely,

Charles W 'Chip' Treinen
President
Southeast Herring Conservation Alliance



Southern SE Regional Aquaculture Association

14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348

December 22, 2021

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair

By Electronic Copy Only: dfg.bof.comments@alaska.gov

Re: Comments on 2022 Southeast and Yakutat Finfish and Shellfish Proposals

Dear Chair Carlson-Van Dort and members of the Board of Fisheries,

Thank you for the opportunity to comment on the proposals you will consider at the above-referenced meeting. Southern Southeast Regional Aquaculture Association (hereafter "SSRAA") is a regional non-profit salmon hatchery organization formed under state and federal law, and which was originally incorporated in 1976. SSRAA is governed by a 21-member board of directors who represent a cross section of regional salmon users, communities, and members of the public. The SSRAA board has considered and approved the support or opposition to proposals which have been summarized below:

Proposals 101 and 103: SSRAA OPPOSES.

These Proposals are substantially similar to the recent Prince William Sound Finfish meeting Proposals 49 through 53 and should be similarly rejected without action or deliberation by the Board. Over the last several years, the proposers of these and similar proposals, ACRs and emergency petitions have put forward specious arguments that are contrary to sound logic, empirical data and good public policy. It is to the Board's great credit that it has seen past these exaggerated, alarmist viewpoints and not given any oxygen to these irresponsible views. Although all Alaskans have the right and opportunity to express their views in this forum, a summary judgment by the Board of these burdensome and repetitive proposals is appropriate and correct in this instance.

Furthermore, SSRAA would draw your attention to highlight several specific points among the myriad and sundry reasons for opposition to these proposals:

1. Overall hatchery production levels have been steady for decades, a time period which encompasses many record-breaking returns of both hatchery and wild salmon. The supposed deleterious effects to natural runs that the proposers hypothesize have been proven false repeatedly. Alaska's PNP hatchery operators and the Department are well aware that there can be periodic levels of increased



- straying in the samples of some streams, but the overall fraction of enhanced salmon straying remains very low. The Department's long-running, unbiased research project regarding potential hatchery impacts on wild stocks should be heeded when completed and understood.
2. The Alaska Constitution and resultant policies already require that the Department protect wild salmon populations from any "harmful and adverse" interactions with hatchery releases. These proposals provide no tools for achieving this requirement that the Department doesn't already have, they only seek to undermine and micro-manage the sound practices that have been proven successful for decades. The public trust, as cited by the proposers, has been well protected for many years.
 3. Enhanced salmon are vitally important to Southeast Alaska's commercial fisheries, with an annual ex-vessel value that has averaged \$44 million in recent years. The consistent catches of hatchery salmon have had the effect of stabilizing the region's total run volume, enabling fishermen to increase incomes, invest more into their businesses and into the workforce. Sport harvest of hatchery-produced salmon also has a significant impact on the region's economy. Resident anglers who target enhanced fish spend money on boats, fishing gear, fuel, and supplies, while non-resident anglers often hire local charter fishing companies that source many supplies locally and provide jobs to residents. In total, Southeast Alaska hatcheries account for 2,000 jobs on an annualized basis, \$90 million in labor income, and \$237 million in total annual output, including all multiplier effects.

SSRAA urges the Board to review the relevant data and narratives submitted by the Department and SSRAA's sister organizations, and truly understand what a massive impact it would be for the economy and culture of Alaska to have its hatchery programs dismantled through adoption of these proposals.

Proposal 104: SSRAA SUPPORTS

This is a SSRAA-authored proposal which establishes a Terminal Harvest Area ("THA") for Burnett Inlet, a SSRAA facility that produces chum salmon which are caught throughout the region. In addition to the reasoning we included within the Proposal, SSRAA offers the following points in rebuttal of the Department's comments:

1. The Department's comments focus on the size of the proposed THA, indicating that it would not allow for an "orderly" fishery. With all due respect for the Department's opinion, the SSRAA Board of Directors have long considered how this THA would function:
 - Any openings in the THA would be carefully crafted by the gear group representatives on the SSRAA Board who are knowledgeable about the area and the opportunity. The Board is creative, engaged, and carefully deliberates all THA opportunities each preseason.



- The Burnett THA will offer another tool for the SSRAA Board to select from when balancing allocation of value to the fleets. Having a diversified selection of areas for the fleets to fish is crucial for allocation planning.
 - Any THA opening at Burnett would take into account the other fisheries occurring in other areas. The chance of this THA attracting an overwhelming number of boats is small and would be self-correcting
 - All commercial gear groups successfully conduct lineups of one type or another for favorable hook-offs, sets or drags. The Burnett THA is no different in this regard. Fishermen can and do manage themselves in these situations.
 - The SSRAA Board could choose to keep the THA open or closed to common property fisheries at any time, either within the yearly rotational fishery plan or in-season, working with the Department using EO authority. We have along track record of successfully managing THAs together this way.
 - There have been recent chum openings within this area and right outside. SSRAA has observed effective chum troll fisheries extending right next to the hatchery, and the Fawn Island line seine fishery which is conducted during large pink returns have shown us that fishing effort in this area can be conducted effectively. Cost recovery fishing within the proposed THA area has also given us good information on how a common property fishery could be conducted. We do believe that carefully targeted THA openings could be prosecuted in an orderly fashion.
2. The Department comments say they oppose "...common property fisheries within the confines of Burnett Inlet because of the presence of wild stocks...", which is flawed logic considering that the SSRAA-produced chum salmon within the Inlet are 1.) well segregated from natural stocks, and; 2.) are required to be removed by the hatchery permit holder as a permit condition. Whether the enhanced salmon are removed from Burnett Inlet through common property openings in a THA or through cost recovery in an SHA is not a material distinction. The matter of wild stock/hatchery interactions within Burnett Inlet was taken into account by the RPT, by SSRAA and by the Department long ago.

Proposal 105: SSRAA SUPPORTS

This is a SSRAA-authored proposal which establishes a Terminal Harvest Area for Port Saint Nicholas, a release site for chinook salmon. The reasoning SSRAA included within Proposal 105 is self-explanatory and is seen as being essentially "housekeeping" in nature.

Proposal 106: SSRAA SUPPORTS



This is a SSRAA-authored proposal which establishes a Special Harvest Area for Port Saint Nicholas, a release site for chinook salmon. The reasoning SSRAA included within Proposal 106 is self-explanatory and is seen as being essentially “housekeeping” in nature.

Proposal 107: SSRAA SUPPORTS

This is a SSRAA-authored proposal which establishes a Terminal Harvest Area for Port Asumcion, a release site for chum salmon. The reasoning SSRAA included within Proposal 107 is self-explanatory and is seen as being essentially “housekeeping” in nature.

Proposal 108: SSRAA SUPPORTS

This is a proposal authored by ADF&G which establishes a Special Harvest Area for Port Asumcion, a SSRAA release site for chum salmon. The SHA that Proposal 105 would establish mirrors what the Department has allowed by EO for the past three summers and is acceptable for effective cost recover by SSRAA.

Proposal 109: SSRAA SUPPORTS

This is a SSRAA-authored proposal which establishes a Special Harvest Area for Carroll Inlet, a SSRAA release site for chinook salmon. The reasoning SSRAA included within Proposal 109 is self-explanatory and is seen as being essentially “housekeeping” in nature.

Thank you for your attention to these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "David Landis", written over a horizontal line.

David Landis
SSRAA General Manager

Submitted By
Stephanie Masterman
Submitted On
12/22/2021 10:17:02 PM
Affiliation



PC337
1 of 1

My name is Stephanie Masterman, I am a member of the southeast Alaskan community and a Tlingit & Haida tribal citizen, and I am writing in support of proposals 156, 157, and 158. These proposals offer changes necessary for safer management of the commercial herring fishery in Sitka Sound. It is crucial for the board to prioritize rebuilding the fishery by protecting the herring stock's resilience, ability to reproduce, and ensuring the population retains mature females who are known to lead the stock to spawning grounds. The subsistence roe-on-branch harvest is a sustainable practice, thousands of years old, and needs to be protected and prioritized. I believe these proposals support that goal.

Additionally, I am opposed to proposals 159, 160, 161, 163, 164, 165, and 166 because they are not scientifically grounded, they disrespect and reject modern and traditional Tlingit knowledge of the fishery and the greater ecosystem, and will inevitably cause damage to and reduction of the Sitka Sound herring stock. These proposals fall far short of what is necessary to ensure healthy herring populations for future generations of Alaskans and all who benefit from the herring.

Herring are more than just an economic resource. They are a lifeline to Tlingit people, Alaskans, and the entire ecosystem. Proposals 156, 157, and 158 should be adopted in order to sustain the Sitka Sound herring fishery.

Submitted By
Stephanie Stallings
Submitted On
12/22/2021 9:50:05 AM
Affiliation



PC338
1 of 1

I may not live in Alaska, but this seems important enough to say something. I recently completed a student project on Pacific herring populations in the Gulf of Alaska, which has broadened my perspective on the importance of herring to U.S. fisheries and the threats they face. As it exists now, the sac roe industry is wasteful and risks destabilizing an already much-reduced herring population in Alaska. Please support herring protections for the sake of sustainable harvest, because otherwise the herring population may no longer be healthy enough for a worthwhile fishery.

Submitted By
Steve Hoffman
Submitted On
12/17/2021 6:43:41 AM
Affiliation
private citizen

Phone
907-220-6475
Email
mcs123@gci.net
Address
PO Box 7064
Ketchikan, Alaska 99901



PC339
1 of 1

Dear Board of Fish members:

First, I am writing these comments to express my displeasure with the BOF decision to hold the SE Alaska meeting in Ketchikan despite the high level of Covid outbreaks in this community. Holding this meeting in person without strict mitigation measures such as mandatory masking, proof of vaccination, and physical separation minimums will increase the risk of Covid spread within this community. I Would Encourage The BOF to Delay This Meeting Until A Future Date When Covid Cases Have Decreased.

Second, when the BOF holds the SE Alaska meeting I would like to express my support for the intent of Proposals 84,85.86. and 95. Adoption of the intent within these proposals will give direction to ADF&G to manage the SE Alaska king salmon sport fishery to stay within its allocation without restricting resident anglers unless wild stock king salmon conservation is mandated. In other words. nonresident anglers should carry the bulk of responsibility for staying within the king salmon allocation assigned to the SE Alaska sport fishery.

Sincerely:

Steve Hoffman

Submitted By
Steve Hutchinson
Submitted On
12/22/2021 11:51:19 AM
Affiliation



PC340
1 of 1

As a former resident of Sitka and as a beneficiary of the generosity of subsistence herring roe harvesters, 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. Moreover, honoring the proposals of the Sitka Tribe of Alaska is of the utmost importance. Sheetka Kwaan, now represented in part by Sika Tribe of Alaska, have stewarded the herring population and the overall abundance of the ecosystem in Sitka since time immemorial and their wisdom on this topic must be heeded.

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. Many herring fisheries throughout Southeast have crashed in the past century due to overfishing. We must allow the populations to rebound, including allowing the population to rebound to the level of abundance that was seen by the indigenous peoples of this land prior to the start of the commercial fisheries.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. We must move toward respect for the herring as well as Sitka Tribe of Alaska and the elders sharing their wisdom on this issue.

Sincerely, Steve Hutchinson



Testimony to Support SE AK Fish Board Proposal 155 at Jan. 2022 Board meeting in Ketchikan

I am Steve Mathews of Coffman Cove, AK. I am not affiliated with any fishery organization or institution. I am retired from AK commercial fishing but still sport fish. If enacted, proposal 155 would eliminate the use of treble hooks in all SE AK sport fishing, and require that any sport caught salmon released from sport gear, either voluntarily or as required by minimum size limit, daily catch limit, season closure, or numerical quota by fishery, be so released without lifting that salmon from the water, as is commonly done now by landing net or hand. These two interlocking regulations are needed primarily to reduce the incidental mortality rate on caught but released Chinook salmon ("shakers"). Virtually all Chinook stocks from SE AK streams and rivers, particularly the important trans-boundary ones, are at critically low levels.

The total Chinook shaker catch in SE AK by all hook and line gear, including commercial troll, is imprecisely known, but is much in excess of one shaker per every Chinook retained legally. An average of 25% of these will die from the hooking and handling stress. The degree to which such incidental mortality can be reduced by eliminating treble hooks and requiring in-water release is uncertain; but anyone who has commercially trolled or sport fish fished extensively would honestly concur that it requires more human effort and causes more stress on the fish to release a salmon hooked by two or three points of a treble than one caught by a single hook. The research to unequivocally estimate the reduction in shaker mortality from the two interlocking restrictions proposed in 155 would be extensive and expensive. I think that several thousand Chinook salmon could be saved each year in SE AK, if proposal 155 rules were applied to both sport and commercial troll fisheries. But being more experienced with sport fishing, I would defer to the trollers and ADFG regarding regulations for the commercial fishery.

Although there are dozens of published studies comparing mortalities of fish of all kinds released from treble vs single hooks, they are marginally relevant to the current SE AK salmon sport fishery. Our case is unique. Some common sense must prevail in lieu of hard science. Most people troll, such that the salmon are attacking a fast-moving bait or lure and therefore tend to get hooked in the outer parts of the mouth or jaw, not deeper. Consequently there is an easy, in-water way to un-hook them from a single hook: slide the leader against the inside bend of a gaff or boat hook as you pull the leader in the opposite direction of the fish; tug modestly as the gaff or boat hook interlocks with the bend of the hook, and most fish are gone. Try this with a fish that has three points of a treble hook buried in upper and lower jaws, and you could rip off jaw parts or worse. Commercial trollers who are aware enough to avoid trebles have used this relatively benign single hook release technique for years. It is well explained in public education pamphlets of states that have adopted rules similar to proposal 155. Or use one of several plier type of de-hookers on the market that all work far easier with single hooks than trebles. Or just cut the hook off-they are virtually costless compared to the value of the saved fish. If you are in doubt about the legal length of that fish still in the water, let it go. Measuring them on board is another unhelpful, two-handed struggle.

I foresee no added enforcement complexity due to the requirements of my proposal. Patrol agents routinely stop boats on the water to check for licenses, illegal fish aboard, proper safety equipment, etc.



Everyone with a rod out reels in, so any treble hook at the business end becomes apparent. There is already on the rules a far more complex release technique required for endangered demersal rockfish. Watching for someone who might net a salmon and bring it aboard before release, seems far simpler than enforcing the rockfish requirements. All the other states and BC have enacted one or both of my proposal 155 requirements, for varying segments of their salmon fisheries. AK is the holdout.

Most people will readily comply. The needs are self-evident. However, the sport guide and charter businesses might have a reasonable objection. Their clients may like to take pictures of their fish out of the water, particularly of the big Chinook that must sometimes be released along with the under-sized ones, if (say) caught out of Chinook season, or caught by a non-resident client without a Chinook endorsement, or by someone who may have caught his/her daily Chinook limit. I would counter that these businesses are best off in the long run with more Chinook in the water.

Eliminating treble hooks everywhere should benefit rockfish, lingcod and other fish facing too much fishing related mortality. Trout in streams can be caught as well with single hooks as with trebles, to likely improve their catch and release survival. Salmon snaggers in streams usually use trebles. Enforcement against snagging would be easier if trebles were outlawed everywhere.

Tackle manufacturers and retailers may have costly inventories of treble hooks and lures with trebles. It would therefore be fair to enact proposal 155 with a suitable grace period before enforcing full compliance.

Thank you for considering my proposal.

Submitted By
stephen b mathews
Submitted On
11/1/2020 9:10:17 AM
Affiliation
self



PC341
3 of 3

Phone
9073292139
Email
sbmathews38@yahoo.com
Address
109 neptune drive
coffman cove ak
coffman cove, Alaska 99918

This comment pertinent to Proposal 121 of 5 AAC 33.350 Closed waters, to be considered at SE Fish Board meeting spring of 2021.

Having gillnetted out of Coffman Cove for 30 years, and still residing there though no longer gillnetting, this proposal addresses no realistic human safety concerns, adds unneeded enforcement burdens to the State, and unnecessarily stirs up sport:commercial emotional conflict. Less than 2% of total gillnet sets in upper Clarence Strait occur in this area. When gillnetting I stayed out of this area, in respect to my sport fishing neighbors, and not wanting my net accidentally damaged by any of them. We worked it out neighborly. My net was damaged multiple times over those 30 years by seiners, tugs, yachts, the Coast Guard, guide boats, private sport boats, and other gillnetters. I sucked it up and fixed the net, usually with financial or human effort help by the damaging party-including the Coast Guard. It was no big deal compared with all the other hassles of gillnetting. Never was there a human safety concern, though sometimes the damaging vessel could not run due to mechanical failure or net in the prop. If such, I would tow them to the Cove or make sure someone else did. I would help them find divers or mechanics as needed. Please vote no on this unneeded proposal.

Submitted By
Steve Merritt
Submitted On
11/22/2021 9:32:09 AM
Affiliation



PC342
1 of 16

~~Proposal 81 Amendments

Madam Chair and Board of Fisheries members

I created proposal 81 and now have some suggested amendments.

First of all, when I created the proposal, I was under the impression that September 1st would be the soonest the department would know if there were treaty chinook allocations that would go unharvested. I have been informed that the department in some cases knows before September 1st. So, I suggest the first amendment be that the date be removed all together.

Second, I should have included the sport fishery along with the troll fishery to harvest these fish. At the time of 81's creation, I was concentrating only on situations similar to what happened in 2019 when covid crushed the sport fishery.

There are other situations in which the sport fishery could help the troll fleet harvest the unharvested allocations. So, I would encourage you to amend the proposal to include the sport fishery as a possible fishery to help clear the treaty table.

Because of this second amendment, the issue of dividing the unharvested allocations between the troll and sport fisheries must be addressed. It has been suggested that an 80/20 split between the troll and sport fishery is a place to start. However, I do not see this option as being one to ensure all of the excess allocation is harvested nor the best use of the excess in some situations.

For example, if the predicted unharvested allocations totaled 10,000 kings, an 80/20 split results in 2000 fish to be harvested in the sport fishery. That may be too many fish for the sport fishery to harvest before the end of their fishing season. Thus, defeating the proposal's original goal and leave some fish unharvested.

About 4% of the sport fisheries treaty harvest has traditionally occurred between the 15th and 28th of August. About 1% of the sport fisheries treaty harvest occurs after September 1st. So, the harvesting power of the sport fishery is fairly weak towards the end of the fishing season. In the above situation a 90/10 split may be necessary to accomplish the goal.

Another possibility is if the remaining excess allocations total only 500 fish. At an 80/20 split it results in 400 for the troll fleet and 100 for the sports. In this situation 400 fish is probably just a 1 fish per boat limited troll fishery, if at all. It may not be possible to open the troll fishery for just a one fish retention and still harvest 500 fish or less. If the sports had a 500 fish harvest capability, maybe it would be better to allow the sport fishery to harvest it all.

Let the department determine the best method of division resulting in accomplishing the proposal's goal. There are so many situations that one shoe just won't fit all. The important thing to keep in mind is the original goal and not squabble too much about how it's done.

So, with the above amendments to proposal 81 in mind (6) should look something like this.

(6) If the department determines that any of the above fisheries will not catch their entire allocation of treaty Chinook for the year, the department will determine the best way to divide the excess between the troll and sport fisheries to ensure that it is caught.

Steve Merritt



Madam Chair and Board of Fisheries Members,

I created proposal 88 and now no longer support it. I submitted the proposal on February 25 , 2020 before the impacts of Covid hit the sport fishery. I no longer support it because in the aftermath of Covid, I doubt the allocation criteria spelled out in **Alaska Statutes 16.05.251**, can be met.

Below is the criteria list from 16.05.251

(1) the history of each personal use, sport, guided sport, and commercial fishery;

In 2020, despite increased sport bag limits, the fishery could not catch their allocation of kings due to covid 19 impacts. In 2021 the department augmented the current plan drastically to ensure the sport fishery caught its entire allocation because of covid 19 impacts.

When the most recent history of the sport fishery harvest is considered it can be easily concluded that more fish allocated for the fishery is not necessary nor the solution to the fishery's current problems. It would also be wrong to rely on past harvest history since there is no way of knowing what the harvest trend of the fishery will be in the aftermath of covid. It could be significantly different and there is no way to make an accurate prediction. Allocation changes would be better addressed when the sport fishery is no longer harassed by the pandemic.

(2) the number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;

Predicting the number of participants to participate in the future would be highly debatable and speculative. The covid pandemic is going to be with the world for quite some time according to health experts. Covid will most likely impact travel to Alaska for several years. To what extent who is to say? The delta variant of the covid virus created another pandemic within a pandemic. A new variant unsusceptible to the new vaccines could easily throw the country in to another economic crash similar to 2020 in a matter of weeks. So, to reasonably predict any accurate numbers of future participation by nonresidents would be difficult if not impossible.



(3) the importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption;

If anything, the decrease in nonresident fisherman has increased the residential sport fisherman's opportunity to obtain fish for consumption.

(4) the availability of alternative fisheries resources;

It can be easily documented that there is no need for an alternate fisheries resource at this time. The opposite is true in the current situation where there is more than enough of the resource available. Especially if managed correctly.

(5) the importance of each fishery to the economy of the state;

Currently all of the fisheries involving Chinook salmon can be demonstrated to be very important to the state economy overall. It would be a lengthy article to recite the economic mechanics of both the troll and charter fisheries. Sufficed to say both industries employ and support major parts of the Southeast economy. To allocate more fish to one at the expense of the other, would end in a deficit to the state's economy as a whole.

(6) the importance of each fishery to the economy of the region and local area in which the fishery is located;

In the Southeast region the commercial troll fishery and the charter fishery are both a valuable part of the economy. The troll fishery amid the covid 19 pandemic is performing as it always has. It has been economically stable. The charter fishery has not and has been deeply impacted. Given the recent sport harvest history where the problem clearly is not a lack of fish but covid, it is not logical nor rational to take fish from a functioning troll fishery, making it less economically viable, in attempt to revive the charter fishery from covid . In the current pandemic conditions, risking harm to a well-functioning economic participant of Southeast's current fragile economy, unwisely risks detrimental harm to the region's stability.

(7) the importance of each fishery in providing recreational opportunities for residents and nonresidents.

It can be shown that the opportunities for both would not significantly change if the allocation was changed. 2020 showed there was excessive opportunity for both and 2021 shows that had management been more appropriate for the situation, opportunity for the nonresidents would not have been impacted.

Sincerely, Steve Merritt



Comments on proposal 88 1/5/2021

I created proposal 88 and below is how I came to the conclusions incorporated in 88.

Math.

First of all, the data used to compute percentages and historic trends came from the department. I used the harvest history of the sport fishery from 2009 to 2018 with the exception of 2015.

In 2015, the State Chinook technical team was in a dispute with the Southern team on what exactly the correct abundance prediction should be. Alaska's team insisted that the abundance was much higher than what the South predicted. Below is a paragraph from the department's summer Chinook fishery announcement on 6/26/15.

The Alaska Department of Fish and Game announced today that the first Chinook salmon opening of the general summer troll season will begin at 12:01 a.m., July 1. The opening will be managed in-season and closed by emergency order. Through the Pacific Salmon Commission process, Alaska has committed our fisheries management programs within Southeast Alaska to be configured around an assumed draft abundance index (AI) of 1.45 for the 2015 fishing season. Notwithstanding the decision to configure the SEAK fisheries for an assumed AI of 1.45, Alaska does not agree that the draft calibration from which that number was derived is accurate.

I did not use the harvest data for 2015 because Alaska that season, ended up exceeding their treaty quota by about a 100,000 fish. That is far and away the most Alaska managers have exceeded the treaty Chinook quota. To be using 2015 as a reference to develop any type of accurate historic trends as far as usage of the resource, would be an error.

This proposal is based on the premise of a nonresident daily bag limit of one Chinook and an annual limit of 3.

So, in looking at the past bag and annual limits of the years 2009-2018, I had to adjust the nonresident harvest record down on years when the bag and annual limits were above 1 and 3 respectively. That would aid me in determining what their usage would have been under this proposal's requirements.

In discussing this with a department staff via email, we both agreed that the relationship between bag and annual limit to nonresident harvest, was not a direct one. In other words, it would be incorrect to say that if the nonresident daily bag limit had been 1 instead of 2, or the annual limit half of what was authorized, that the nonresident harvest itself would have been reduced by 50%. When I



suggested the relationship be closer to 30% than 50% , I was told that would be closer to reality.

To that end, the standard I used was 33% and I adjusted the past nonresident harvest down by a 1/3 to obtain a hypothetical 1 fish daily bag limit situation. Similarly, when bag limit one and the annual limit was 5 or 6, I adjusted the nonresident harvest down a 1/3 to get a hypothetical annual limit of 3. But when the bag limit was above 1 and the annual limit was above 4 in the same year, I felt a reduction of 33% unrealistic.

Here's why. There are several types of nonresident anglers. There are the guided, the non-guided who bring their own boat or rent one, and visiting relatives of Alaskans.

Since most charters are of the 3-day nature, the 3 day guided historic harvest would not be affected by an annual limit greater than 3, unless the daily bag limit had been greater than one fish. For the historic catch of charters longer than 3 days, the non-guided renting boats, traveling yachts and family visitors, the annual limit of greater than 3 would play a part in their harvest. These people typically stay in Alaska longer and possibly fish for more than just 3 days. Consequently, in past years where both the bag limit was above 1 a day and the annual limit above 3, the hypothetical reduction of bag and annual limit down to 1 and 3, would have affected the harvest of all non-resident anglers, short term and long. Even though the real impact is probably closer to 50% in those situations, I chose 40% just to be on the safe side.

So, for years like 2011 and 2016 where the nonresident daily bag limit was 2 and the annual limit was 5 and 6 respectively, I reduced the nonresident treaty harvest by 40%, to get a more realistic hypothetical harvest based on 1/per day and a 3-annual limit.

Once the past nonresident harvests had been adjusted to simulate a 1/day and 3 annual limit, I took that adjusted nonresident harvest and added it to the resident harvest. This became the hypothetical sport treaty Chinook harvest for that particular year.

I then applied those adjusted harvests to the appropriate CPUE bracket based on the past Abundance Index assigned to the year the fish were harvested.

Example in 2011 the daily nonresident bag limit was 2 fish and there was an annual limit of 5. The nonresident harvest for that year was 34,450 treaty kings. To reduce this harvest by a 40% I multiplied 34,450 by .6 to get an adjusted nonresident harvest of 20,670 treaty fish. I then added in the resident harvest of 19,967 to get a hypothetical total of 40,637 treaty kings for the sport fishery in 2011 ..

I then went to the CPUE brackets and found the bracket that fit the 2011 abundance index number of 1.69.



An abundance index of 1.69 results in a 266,585 total treaty allotment for Alaska using the new treaty CPUE methodology. I then subtracted the nets which is 7.2% plus 1,000 set net fish, and came to troll/sport amount of 246,391 treaty kings. Then I applied the adjusted sport catch of 40,637 to 246,391 and it computed to 16 %.

I repeated this procedure for the years 2009-2018 with the exception of 2015. From there I looked for trends that would aid in developing a proposal that would fit the new treaty CPUE brackets.

For the upper CPUE bracket where the allotment is based on a 2.2 abundance index and higher, we have a couple of years history to extrapolate from. In 2014 there was an abundance index of 2.57 and the sport treaty harvest, after adjustment, resulted in a hypothetical sport harvest of 17% of the new CPUE allotment. Similarly, in 2016 there was a 2.06 abundance index and after adjusting for the new bag and annual limits resulted in a hypothetical harvest of 15% of the new CPUE allotment. Although 2.06 is not above 2.2 it is just .14 short of that and it's the only year out of the 9 available that is realistically close enough to 2.2 for mathematical comparison.

The average of indexes 2.57 and 2.06 is 2.3 which is about as close as we are going to get to 2.2. So, if the mathematical theory holds together, you should be able to average the sport treaty harvest of those years to come up with a trending percentage. The average of 17 and 15 percent is 16%.

This gives us an idea of what would happen on the upper CPUE bracket if a nonresident daily bag limit was one fish and an annual limit of 3.

In looking at the lower CPUE brackets we find that we have 3 years of data that would apply to the lowest CPUE brackets. The years 2013, 2017 and 2018 were years in which the Abundance index was between 1 and 1.27. In 2013 the AI was 1.2 and that year's harvest applied to the new CPUE bracket computed to 34% of the sport/troll allocation. Similarly, 2017 a 1.27 resulted in a 23% harvest of the sport/troll allocation, 2018 at a 1.07 AI resulted in a 16% harvest.

The average of these three years of lower end Abundance Indexes computes to an average 24% harvest of the sport/troll allocation based on the new CPUE system.

This gives us an idea of what the sport harvest of treaty chinook would be under a 1 per day and 3 annual limit in the upper and lower CPUE brackets.

As far as computing every CPUE bracket's sport harvest percentage there simply isn't enough data to do this accurately. So, we have to make some educated assumptions.

For instance, the first CPUE bracket down from the very highest bracket starts at an AI of 1.805-2.2. We consult the history in which we have a similar AI of above



1.8 and less than 2.2 and we have only one year, 2016. 2016 adjusted sport harvest resulted in a 15% harvest when compared to the new CPUE brackets. If the mathematical trend of the sport fishery needing 16% of the sport/troll allocation in the highest bracket and 24% in the lowest, it would not make sense to use 2016's 15% harvest as the indicator for what the sport harvest should be in the bracket below the highest bracket. The predicted percentage usage should be at least as high as the highest bracket or higher but not lower.

The development of the other CPUE bracket's sport treaty harvest followed similar logic and mathematical computation.

After concluding each CPUE bracket's sport/commercial troll percentage parameters, I went to the official regulation language on the sport management plan.

I then adjusted the current plan with the new allocation percentages and annual/daily bag limits. In the higher CPUE brackets I adjusted the nonresident daily and annual limits to one a day and a 3-annual limit. On the lower brackets, since there were more fish available to the sport fishery, I tried to benefit the resident fishery as much as I could.

However, there were problems I saw in the nonresident fishery management that needed solving. In some cases, solving those problems took precedence over transferring fish to the resident fishery. There are several changes written in board of fish format and I won't go thru all of them. I list a couple below.

The current plan on the CPUE less than 6 and greater than or equal to 3.8, calls for a nonresident to be allowed one king a day, 3 annual limit before July 1, two annual limit before July 7, and 1 annual limit after that. I find that this is unnecessarily complicated. Since there was more fish available due to this proposal's higher allocation percentage, I felt I could simplify things by allowing a nonresident one a day bag limit with a two-annual limit for the entire season instead of a 3,2,1 step down annual limit.

In the lowest CPUE bracket, in the current plan nonresidents were not allowed to keep a king salmon from July 1 thru August 15, yet anglers arriving before June 15 could keep 2 kings. And if they fished between June 16th and June 30th, they were allowed to keep one king. I see this as unfair to other nonresidents who can't seem to make it to Alaska before July 1. Currently the guided fishery preferencing more kings early is actually hurting other nonresidents guided or not. Alaska management of its nonresident sport fishery should not facilitate a race to get to Alaska before the sport quota is gone.

Since this proposal's allocation percentage is 24%, I changed the nonresidents harvest to allow one king the entire year or until the allocation is reached as opposed to 2 fish before June 15th and then one before July 1. However, that may be too aggressive and it may result in the closure of nonresident Chinook retention



before the end of the fishing season, possibly mid August. But it would ensure more nonresidents take home a king salmon rather than giving 2 kings just to the early birds and none for others. Overall, more people would think positively about Alaska fishing than just a select few.

Most of the other changes are self-explanatory. Some of them I made to simplify the plan because it is excessively wordy and complicated.

In looking at other proposals on this subject, proposal 88 addresses several of the points brought up by other proposals. Proposal 88 includes proposals 93 and 86.

The proposal 83 by SEAGO, 88 is a version of what 83 should specifically look like, resulting in an overall average of a 20% allocation for the sport fishery. As 83 suggests it is clearly defined in 88. However, 83's removal of allocation percentages from the tiers is not. You can't have a wish of clearly defined and yet at the same time the allocation percentages not defined.

It is also difficult to see the department being able to manage its Chinook fisheries with a goal of staying within federal quota limits, when some departments are managing to a specific allocation percentage and one is not. In addition, I think it would create discontent within the department itself if such a scenario existed.

The language of proposal 84 and 85 is incorporated to a certain extent in proposal 88 5 AAC 47.055. (b). The language of proposal of 85 could substituted for 88 section (b) but it could result in the sport fish allocation being exceeded if the nonresident fishery was not managed appropriately.

Proposal 95 is not included in 88 and that was purposely intended. As 88 notes that one of the problems I saw was that on high abundance years the nonresident annual limits were excessive. To the point that nonresidents were taking home more king salmon than most average Southeast residents were. Now, if proposal 95 was modified to only increase the bag limit of nonresidents to its maximum of one a day and 3 annual limit and leaving the shortfall predicted to be captured by an increase in the resident bag limits, that would be acceptable to me.

With proposal 88's new allocation percentages however, the dilemma of having substantial excess fish in the upper tiers, should not be an issue. It is my hope that proposal 88 will result in no closures to the sport fishery and fully utilize the majority of its allocation at the same time.

You will notice that I have the CPUE tiers this proposal is based on, in brackets. It is intended to get the sport fish management plan in terms of numbers of fish without any references to federal treaty language. In this proposal the tiers are referenced just to keep readers aware how the fish numbers are related to the CPUE brackets.

In 1999 the sport management plan was based on Abundance index numbers produced by the Pacific Salmon Commission. In 2010 Alaska lost 15% of its



harvest share of treaty Chinook in the 2009 treaty negotiations. From 2010 to 2018 the sport fishery bag limits were based on the same abundance index numbers, **yet each index** number represented 15% less fish than when the plan was created. This could have easily resulted in a management plan that consistently over harvested the specified abundance.

In 2019 the state went from an Abundance index system to a CPUE of the winter troll fleet to determine its harvest share of treaty Chinook. In anticipation of this, the Board of Fisheries had to revise the sport plan to fit the new treaty language and provisions since it was previously based on Abundance index figures. Had the State had their Chinook management plans based only on numbers of fish instead, the plan would have endured any abundance indicator changes brought on by treaty agreements. The State is asking for trouble by keeping any Pacific Salmon treaty language within their management plans for the king salmon resource. Let the managers decipher the changing federal acronyms to determine fish available for management, then apply those fish numbers to your fishery management plans.



Comments for the Anita Bay proposal

I submitted proposal 97 in response to action taken by SSRAA in 2019, after they received a letter requesting a designated troll only fishing area within the Anita Bay THA.

The SSRAA board granted that request on June 1 thru June 12 of 2019. At first, I was pleased with SSRAA for recognizing the need for trollers to get additional breaks in the terminal area due to their loss of the hatchery king salmon fisheries, in the surrounding areas. Those spring fisheries were the prime source for trollers to harvest their share of the Anita Bay hatchery fish designated by the allocation plan. But in looking at the data of when the Anita Bay Chinook return to the terminal area, it confirmed that they don't show up until June 15th on a normal year. So basically, the troll fleet was given an empty lake to fish in under the pretense of that being a gift from the SSRAA board.

In talking to one of my troll reps on the SSRAA board, he informed me that they tried to get those dates extended to when the fish were actually there, but could not override the net representatives on the board.

It was also brought to my attention that no trollers were observed fishing the special area when they had it in 2019. This was no shock to me since the whole idea was to harvest hatchery kings, not to troll around in an empty bay.

As any sport or commercial troll fisher knows, tide changes, early mornings and dusk are the best times to convince a king salmon to bite. Trollers depend on these instinctual times Chinook salmon decide to go on the bite. That takes time as these opportune moments only happen during short windows of time during the day. This extra time is not necessary for the nets to capitalize on hatchery fish since a net catches the fish regardless of whether or not it feels like biting a hook.

So, more time without net interference is essential for trollers to catch the hatchery kings they are entitled to. Rotations of every other day do not work for troll access or fishing side by side with the net fisheries. Rotations of 3 and 4 day stretches of troll fishers only or, an exclusive area are the best ways to go.

These hatchery fish are not going anywhere since they have reached their spawning ground. Whatever fish that don't fall to the trollers during such rotations will remain in the area and will be readily caught by the nets during their rotations.



In 2020 the SSRAA board terminated this special area for trollers and I was informed that the troll reps had to trade that away to get an extra day in the Carrol inlet THA near Ketchikan. So, it is quite apparent to me that the net representatives on the SSRAA board are giving no quarter to the troll fleet after their loss of their spring fisheries.

If the nets were truly concerned about the proper allocation ratios set up in the allocation plan, they would be doing more for the troll fleet under these circumstances and not conducting business as usual.

The question is, who is really responsible for making sure the allocation plan of hatchery fish is followed? You can't expect the fisherman representatives to represent the plan over their own fleet's interests. Their sole purpose on these hatchery boards is to represent their user group. So, it is not surprising the nets would be opposed to giving the trollers sole access to any parts of the Anita Bay terminal area when the fish were actually there. It would mean the trollers would intercept some of the hatchery kings they have grown accustomed to harvesting.

The responsibility of making sure the allocation plan is followed rests with the Board of Fisheries and they, in my opinion, are failing in their duty. Their duty is spelled out in regulation 5 AAC 33.364 section (c). and so far, I have yet to see the Board exercise its authority under that section. Without the Board's help on this issue, the politics of the SSRAA board will continue to override the troll fleet's needs and the allocation imbalance will continue to widen.

In the Board's defense, if left to their own, they will find it difficult to construct rotations that will solve the issue due to their unfamiliarity with the workings of the fisheries involved. To help the board I have created proposal 97 and if not to their liking please use proposal 97 as an avenue to instill the following alternative.

Alternative

The current June rotational schedule set up by the SSRAA needs to be scrapped and the following incorporated.

- (a) Starting the first Monday in June and ending June 30th.
- (b) Terminating when the spring troll fisheries are allowed to open in the Steamer Point (106-30): and Chichagof Pass (108-10) areas during the month of June.



1. Seiners Anita Bay THA access only on Monday 12:00 noon to Tuesday 12:00 noon.
2. Driftnet Anita Bay THA access only on Wednesday 12:00 noon to Thursday 12:00 noon.
3. Trollers Anita Bay THA access from Thursday 12:01 **pm** to Monday 11:59 **am**.

This alternative rotational schedule is to be in conjunction with the typical closures due to the crab fishery and cost recovery in the Anita Bay terminal area.

This will be about the best the Board of Fisheries can do and still allow all user groups to use the THA. Should things continue to head South for the troll allocation percentages, the only other option would be Anita Bay terminal area be a troll only THA until June 30.

If you need further convincing to act, below is the Anita Bay terminal harvest chart of Chinook. You can see quite clearly that it is not working for trollers.

| Sum of Chinook Column Labels | | | | |
|------------------------------|-----------------|--------------------|-----------------------|---------------------|
| Row Labels | Anita Bay Term. | DN Anita Bay Term. | Seine Anita Bay Term. | Troll Grand Total |
| 2011 | 6,205 | | 3,136 | 161 9,502 |
| 2012 | 3,618 | | 5,540 | 197 9,355 |
| 2013 | 8,433 | | 4,848 | 173 13,454 |
| 2014 | 7,020 | | 2,680 | 165 9,865 |
| 2015 | 4,421 | | 4,818 | 72 9,311 |
| 2016 | 2,050 | | 1,536 | 30 3,616 |
| 2017 | 4,303 | | 4,485 | 36 8,824 |
| 2018 | 5,978 | | 5,149 | 314 11,441 |
| 2019 | 4,048 | | 1,748 | 193 5,989 |
| 2020 | 3,849 | | 4,121 | 44 8,014 |
| Grand Total | 49,925 | | 38,061 | 1,385 89,371 |



Gillnet proposal 113 comments

I created proposal 113 and here is what it does. This proposal raises the bar for when a king net can be used by the drift net fleet in districts 111, 106 and 108.

Currently the department's policy is that there is no net restriction imposed during the early sockeye openings of June, if the preseason Chinook forecast for the Taku or Stikine is above the MID point of the spawning goal. That has resulted in fisherman using king nets in the early sockeye fishery to target kings instead of sockeye. Currently by rules of the Pacific Salmon Treaty in the Transboundary river annex, a direct fishery on Chinook bound for these rivers can not occur unless the preseason Chinook forecast for these rivers is ABOVE the spawning goal.

By not imposing a mesh restriction to ensure king nets are not used is in fact sanctioning a direct king fishery by default. So, this proposal's end goal is to put into state regulation management of the driftnet fishery in district 108 and 111 that fully complies with the intent of the Transboundary annex of the Pacific Salmon Treaty. District 106 is included because it surrounds district 108 and often these districts are opened simultaneously. Differential mesh restrictions for areas that boarder each other, open at the same time, are basically unenforceable since traversing and fishing these two districts during an opening happens frequently.

The second goal of this proposal is to change the current Chinook protective mesh restriction, (when applied) , to one that actually protects Chinook salmon transiting the area. The initial proposal highlights the fact that during the June openings it is a sockeye fishery and the most effective mesh used for harvesting sockeye is 5.25 inches. In the proposal I referenced a study done by the department on mesh effectiveness on catching sockeye. That study is

CATCH EFFICIENCY COMPARISONS OF FOUR COMMERCIAL
GILLNET MESH SIZES IN THE TAKING OF SOCKEYE AND CHUM
SALMON IN DISTRICTS 111 AND 115, SOUTHEAST ALASKA

BY

Joseph Muir

Ray Staska

And Jim Blick



There is however another issue not addressed that is more important concerning kings and mesh size. That is the effectiveness of the typical 6 inch mesh on today's spawning king salmon.

There is conclusive data from the department that proves spawning king salmon are substantially smaller now than in the past. It has been shown that instead of spending 4 and 5 years in the ocean feeding, they are returning after just 3 years in the ocean to spawn!!!

Below is a table of the Taku river age tally for returning Chinook salmon. The trend is alarming and studies show its happening coastwide and not just restricted to a few rivers.

Table .- Terminal brood year returns by age of Taku Chinook salmon.

| Year | Age-1.2 | Age-1.3 | Age-1.4 | Age-1.5 |
|------|---------|---------|---------|---------|
| 1973 | 0.28 | 0.54 | 0.18 | - |
| 1974 | 0.49 | 0.30 | 0.21 | - |
| 1975 | 0.37 | 0.34 | 0.27 | 0.01 |
| 1976 | 0.29 | 0.49 | 0.21 | 0.00 |
| 1977 | 0.48 | 0.37 | 0.13 | 0.01 |
| 1978 | 0.42 | 0.40 | 0.18 | 0.01 |
| 1979 | 0.15 | 0.53 | 0.30 | 0.02 |
| 1980 | 0.18 | 0.48 | 0.33 | 0.02 |
| 1981 | 0.30 | 0.45 | 0.20 | 0.06 |
| 1982 | 0.14 | 0.35 | 0.48 | 0.03 |
| 1983 | 0.22 | 0.40 | 0.35 | 0.03 |
| 1984 | 0.22 | 0.34 | 0.38 | 0.06 |
| 1985 | 0.18 | 0.36 | 0.43 | 0.03 |
| 1986 | 0.13 | 0.43 | 0.41 | 0.03 |
| 1987 | 0.25 | 0.36 | 0.37 | 0.02 |
| 1988 | 0.25 | 0.48 | 0.26 | 0.01 |
| 1989 | 0.19 | 0.48 | 0.33 | 0.00 |
| 1990 | 0.18 | 0.49 | 0.33 | - |
| 1991 | 0.18 | 0.41 | 0.41 | 0.00 |
| 1992 | 0.11 | 0.60 | 0.29 | 0.00 |
| 1993 | 0.16 | 0.57 | 0.26 | 0.01 |
| 1994 | 0.26 | 0.42 | 0.32 | 0.00 |
| 1995 | 0.23 | 0.55 | 0.21 | 0.00 |



| | | | | |
|------|------|------|------|------|
| 1996 | 0.15 | 0.54 | 0.31 | 0.00 |
| 1997 | 0.10 | 0.63 | 0.27 | 0.01 |
| 1998 | 0.17 | 0.51 | 0.32 | 0.00 |
| 1999 | 0.19 | 0.62 | 0.18 | 0.00 |
| 2000 | 0.26 | 0.45 | 0.29 | 0.00 |
| 2001 | 0.21 | 0.63 | 0.16 | 0.00 |
| 2002 | 0.22 | 0.54 | 0.24 | 0.01 |
| 2003 | 0.19 | 0.60 | 0.21 | 0.00 |
| 2004 | 0.30 | 0.55 | 0.14 | 0.00 |
| 2005 | 0.28 | 0.61 | 0.11 | 0.00 |
| 2006 | 0.24 | 0.59 | 0.16 | 0.01 |
| 2007 | 0.35 | 0.48 | 0.16 | 0.00 |
| 2008 | 0.19 | 0.60 | 0.21 | 0.00 |
| 2009 | 0.37 | 0.54 | 0.09 | 0.00 |
| 2010 | 0.27 | 0.68 | 0.05 | - |
| 2011 | 0.41 | 0.53 | 0.06 | 0.00 |
| 2012 | 0.37 | 0.53 | 0.10 | 0.00 |
| 2013 | 0.31 | 0.60 | 0.09 | 0.00 |
| 2014 | 0.28 | 0.57 | 0.15 | - |
| 2015 | 0.32 | 0.68 | - | - |
| Ave | | | | |
| 70s | 0.35 | 0.42 | 0.21 | 0.01 |
| Avg | | | | |
| 80s | 0.21 | 0.41 | 0.35 | 0.03 |
| Avg | | | | |
| 90s | 0.17 | 0.54 | 0.29 | 0.00 |
| Avg | | | | |
| 00s | 0.26 | 0.56 | 0.18 | 0.00 |
| Avg | | | | |
| 10s | 0.33 | 0.60 | 0.08 | 0.00 |

As you can see the spawners instead of spending 4 and 5 years in the ocean, they are returning after only 3 years. We are now down to a point where only 8% of the returning kings to the Taku are 4 ocean fish and the remainder of the run is 3 ocean or less. This means instead of the 18 to 50 lb spawners of the past, we are seeing a much smaller fish returning. The average size of the Chinooks harvested in the district 6, 8 and 11 driftnet June fishery, has fluctuated between 18 and 14 lbs. over the years, but now it's down to between 14 and 12 lbs.

A 6 inch mesh is typically used for chum salmon and is very effective at catching these 9 to 14 lb fish as the mesh study above states on pg 4. . It does not take a rocket scientist to see that a 6 inch mesh would be deadly on today's ocean 3 kings. They are similar in size to a larger chum. In my opinion a 6 inch mesh is not



an effective measure of protection for these fish. I spoke to a gillnetter about it and he said his king net is indeed a 6 inch net because it is the best way to catch the smaller kings we have returning today.

That said I leave you with what the Board of Fisheries has instituted in the past to protect king salmon during a sockeye gillnet fishery. In the Bristol Bay 2019-2021 reg. book you will find regulation.

5AAC 06.331 Gillnet specifications and operations(a) Gillnet mesh sized restrictions are as follows: (1) gillnet mesh sized may not exceed five and one-half inches during periods established by emergency order for the protection of king salmon and the Naknek-Kvichak and Ugashik Districts from June 1 through July 22.

Submitted By
Steven McCurdy
Submitted On
11/8/2021 11:56:43 AM
Affiliation



PC343
1 of 1

Phone
907 530-7042
Email
hollissteve4@gmail.com
Address
PO Box 319
Klawock, Alaska 99925

Comments for proposal #153. Logjam Creek

My comments are based on 25 years of personal observations of Logjam Creek and my background as a fisheries biologist.

First, the summer coho in Logjam Creek are a very unique run of coho. It is not uncommon to see fish attempting to pass the lower falls in late June.

The escapement is unknown, but based on personal observations I would think it is only a few hundred fish in a good year.

It is very difficult for the fish to pass both the lower and upper falls; with the upper falls being the more difficult of the two. The fish tend to concentrate in the pools below the falls, and it can take weeks for the fish to successfully pass the falls (even with favorable flows).

Natural mortality occurs at both falls. Fish often receive wounds when attempting to jump the falls and bouncing off rocks. It is very common to see unspawned fish with fungus on their head and body. In years with periods of low water in July and early August the number of wounded and dead fish observed with fungus can be significant, particularly at the upper falls.

I support the East Prince of Wales Advisory Committee in trying to conserve the summer coho in Logjam Creek. I support fishing closures at both falls. The closures should include all fisheries and not just sport fishing (I have personally observed people harvesting 20 coho a day at the lower falls with a dip net). The Board and ADF&G should also urge actions by Federal managers to protect this unique run of coho.

Submitted By
Steven Stumpf
Submitted On
12/22/2021 1:02:40 PM
Affiliation

Marit Carlson Van Dort, Chairman

Alaska Board of Fisheries

1255 W. 8th Street

Juneau, AK 99811-5526

Re: King salmon management proposals 82 and 83

Chair Carlson Van Dort and members of the Board of Fisheries,

My name is Steven Stumpf and I will keep my comments short and to the point. My wife and I own and operate Silver Sea Adventures, a sport fishing business, located 2 miles southeast of Craig, AK. I have been a sport-fishing guide in Southeast Alaska since 1988 and a business owner since 1999. We are a small family operation with 6 seasonal Alaskan employees. We live in Alaska year-round.

Sport-fishing is and has been my primary source of income since 1988. My wife and I raised 4 children in this industry. Two of our kids currently work with us and wish to follow in our footsteps and run our business for at least another generation.

I would consider our operation small. We host on the average of 8 non-resident customers at a time. Though we are small, our economic impact on the local community is great. We purchase fuel, groceries, fishing supplies, boat engines, equipment and maintenance, hardware, building materials, city utilities, auto fuel and maintenance, restaurants, etc... Almost all of the income generated by our business goes directly back into our community. We feel good about that. We love where we live and the people that live here with us. There are also many other small and a few larger operations in the Craig/Klawock area that benefit these rural communities.

As I mentioned, I have been doing this a long time. When I started guiding (1988) the limit on king salmon was 2 per day 28" or greater in length with no annual limit for non-residents, the entire season. Back then I almost never caught a daily limit of king salmon for my customers and they were never upset because of that. There was plenty of opportunity and that was the attraction to Southeast Alaska. I will emphasize that **we do not sell fish we sell opportunity**. Customers had the opportunity to keep king salmon whether they caught them or not.

For the past two and half decades king salmon limits have been inconsistent and unpredictable due to pre-season abundance and treaty restrictions. We market for each coming season during the fall, winter, and early spring months. King salmon limits for the coming season (after we are done marketing for the upcoming season) are usually posted in April and sometimes as late as May. This makes it very difficult to sell opportunity when you have no idea what that opportunity is and if there is even going to be an opportunity to harvest king salmon. On top of that, there are in-season regulation changes that take away opportunities anglers travelling to SE Alaska were anticipating. The bottom line is we need consistent limits (opportunity) in order to survive as a vital industry to Southeast Alaska. Below is currently what a conversation with a prospective customer is like.

Prospective customer... *"If I go fishing with you do I have a chance of catching and keeping a king salmon?"*

Business owner... *"I think you will be able to keep kings in May or June but after that I cannot be sure." Pause "Hello, are you still there, are you still interested in fishing this coming season?"*

Prospective customer... *"I will get back to you."* Which means I will check my options elsewhere.



For the reasons mentioned in the paragraphs above **I do not support Proposal #82.** It is too similar to what we currently have and have had. We need regulations that are consistent from year to year. Proposal # 82 is also more restrictive to Alaska Residents in low abundance years that use king salmon as a source of food.

I support Proposal # 83. It keeps workable regulations in low abundance years and avoids in-season management. It allows for consistency in king salmon regulations from year to year regardless of abundance. Proposal #83 will allow us to market those numbers to prospective clients so they are aware of their opportunity prior to coming. No surprises, no excuses. Proposal #83 also does a better job of supporting resident access to harvest the resource.

I urge the board to consider support for proposal #83. In years of low abundance, it benefits Alaskan anglers that want to put food on their table and it allows **opportunity** for travelling sport fishermen that will bring much needed income to our rural communities.

Thank you for your consideration.

Sincerely,

Steven M Stumpf

Silver Sea Adventures

Craig, AK. USA

Submitted By
C T t blomstrom
Submitted On
1/30/2021 7:09:14 AM
Affiliation
Sport fisherman



PC345
1 of 1

Phone
5124228328
Email
tblomstrom@yahoo.com
Address
700 lake rd,
coldspring, Texas 77331

Amend the rule on limits of sockeye caught by rod and reel to say that the legal limit shall be the first limit caught shall be the limit set by the "board" regardless of where the fish is hooked.

Too many fish caught other than the mouth die thereby wasting the resource



Alaska Dept of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

December 22, 2021

Members of the Board of Fisheries:

I have been a commercial troller for the past twelve seasons. I operate a 31' power troller, most frequently by myself or with one of my daughters (ages 9 and 14). I chose to become a professional hook-and-line fisherman after nearly three decades of sportfishing in northern Southeast Alaska – an activity I continue to enjoy. I have taken experience in several other commercial fisheries in the region as well and have participated in subsistence and personal-use fisheries too. I have served for over fourteen years on the Sitka Fish & Game Advisory Committee (including two SE BoF meetings as chairman) and continue to serve on this committee. I am Chairman of Seafood Producer's Cooperative, a major processor of troll and longline fish. Our plant is one of the largest private employers in Sitka.

I greatly appreciate the wonderful opportunity for members of the public to provide so much input in the process of changing fishing regulations. Alaska's system of making the knowledge of local fishermen inherent to the regulatory process is truly extraordinary and extraordinarily valuable. I hope that the members of the Board of Fish will be able to truly listen to those of us with decades of firsthand experience on these waters and then to apply broader knowledge to craft the solutions best for the long-term benefit of the fish and the local residents. I appreciate your taking the time to read my extensive opinions below. Thank you.



80: SUPPORT-a gear group that stays within their allocation should never be subject to a reduced allocation the following year due to an overage caused by others. However, there may be times when a gear group exceeds their allocation early in the year and another gear group is forced to reduce their catch in order to prevent the all-gear harvest from exceeding the allowable level. In a situation like this, the gear group that went over should repay the fish that they “borrowed” the following year even if there is not an all-gear penalty.

However, if imprecise management techniques prevent a gear group from catching their entire quota, there should be no need for compensation if another gear group with more precise management is able sweep up the remaining uncaught quota late in the season.

82: support with AMENDMENTS to ensure resident priority- For the most part, this proposal simply reorganizes all of the individual out-of-cycle changes to the existing King Salmon Management Plan that the BoF has recently made in response to the 2019 updates to the Pacific Salmon Treaty. I generally support the status quo that this proposal represents, but urge the BoF to adopt two specific changes:

1st change: Clarifying that the nonresident sport king annual limits should be adjusted as needed to ensure that the resident fishery remains open year-round. The proposal’s language would only protect residents in low abundance years. The plan should be changed as follows to protect resident fishermen all levels of abundance:

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: In accordance with the first change, get rid of 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,

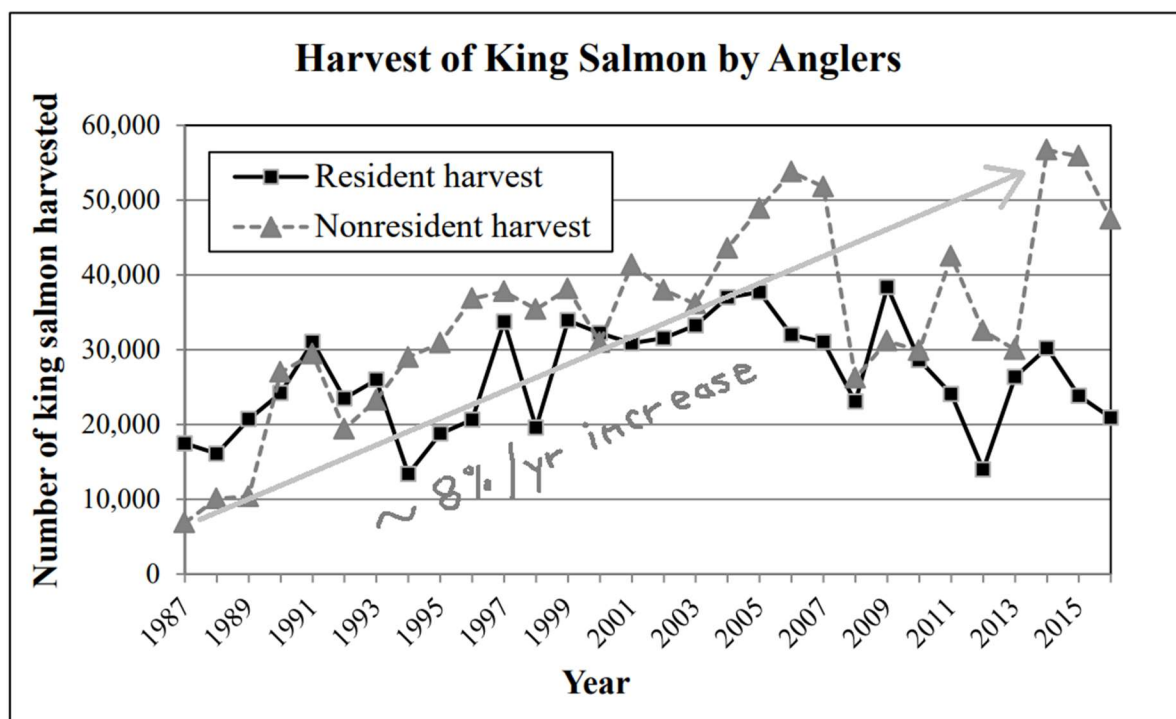
- As the BoF has not made a saltwater C&T finding for Chinook in SE, local residents fulfill their subsistence king salmon needs through the sport fishery. Thus, while protection is not Constitutionally-mandated, most of the reasons behind the Constitutional priority are still applicable to the resident sport fishery. Hence if the non-resident sport fishery, or commercial fisheries (not addressed in this proposal) needs to be cut back in order to assure residents year-round access to the king salmon resource, then the BoF should direct that to happen.



- That the resident sport fishery in SE deserves priority has been recognized by the BoF for many years. The third point of BoF Findings #93-145-FB from March 1992 the were the basis for the original SE Sport King Salmon Management Plan reflect that, as reproduced here:

3. The Board unanimously recognized the importance of the resident recreational sport fishery in providing opportunity to take fish for personal and family consumption. Commercial fishermen were found to supply household needs from the commercial catch. It is the desire of the Board that residents harvesting for personal use suffer the least restriction to meet chinook allocations.

- The resident sport king catch has been stable for decades. Residents have not caused the allocation problem, nor are they likely to cause one in the future. It is the huge increase in non-resident catch that started in the mid-1980s that has triggered allocation fights.



This is Fig. 6 from ADF&G's Special Publication No. 17-15 *Overview of the Sport Fisheries for King Salmon in Southeast Alaska Through 2017: A Report to the Alaska Board of Fisheries* by Robert Chadwick et al. The resident harvest has been stable in



the 20,000-35,000 range for decades. In contrast, the 1987 the non-resident catch was under 6,900 but it grew at a rate of nearly 8% per year to over 50,000 by 2015

- The proposed July resident sport king closure in tier (g) which is moderately low abundance, is unnecessary and inappropriate. The management plan in the next lower tier (h) does not require a resident closure. If residents don't need to be closed in the lowest abundance years, why should they be closed in years when there are more fish available?
- The Staff Comments RC2, says that the department is seeking guidance from the BoF on how aggressively to use of in-season management to precisely hit the sport allocation. The BoF should officially clarify that taking fish from the troll quota in order to avoid in-season management for the sport fishery is only fair if the troll fleet is compensated in an appropriate and timely manner.

Specifically:

- The BoF must require that any fish "borrowed" from the trollers be paid back the following year's by reducing the sport target below their 20% allocation by the same percentage of the sport-troll quota as the previous year's overage. The BoF should direct the department to downwardly adjust the following year's bag/annual limits accordingly. Trollers need to be assured that any fish they loan in one season will be paid back the next year. It is *not* appropriate or fair for the trollers to have to wait until the sport harvest just happens to come in under allocation for the trollers to receive compensation.
- The BoF needs to set establish a trigger range of acceptable deviation (perhaps +/- 1.5% of the combined sport-troll allocation) for the sport harvest. If the in-season data projects that the sport harvest will end up within that range, then no in-season management would be applied. But the BoF should direct that if bi-weekly sportfish catch data indicates that the sport catch will land outside of that range, in-season management measures should be used to get the year's harvest back inside of the acceptable range.

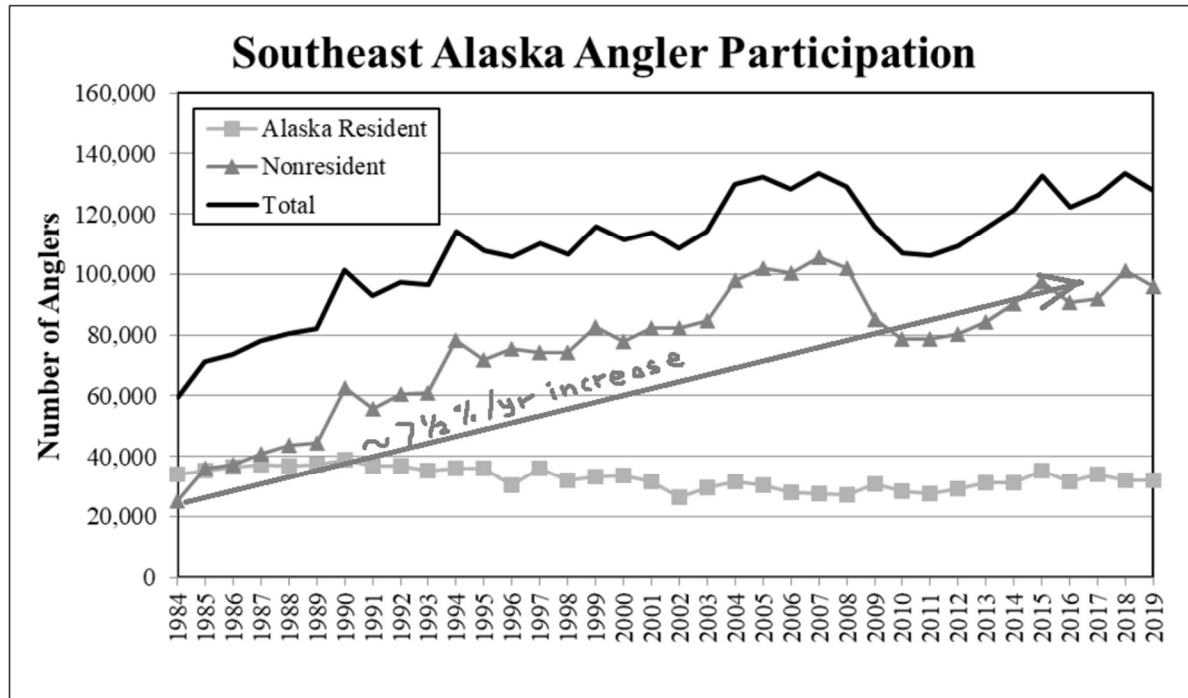


Proposal 83: OPPOSE- This proposal would turn back the clock to the pre-1992 era. It was in that year that the BoF created separate troll and sport quotas to try to restrain the tremendous increase in the sport catch¹. Proposal 83:

- Uses historic data from years of lower effort resulting in underestimates of future sport harvest, even in the near term.
- by failing to account for a continued increase in the number of non-resident fishermen, the harvest estimates become increasing unrealistic in the medium and long-term
- unreasonably assumes that years of very high quotas will occur frequently enough to mitigate the loss of troll harvest in the lower and middle abundance years
- does not include a cumulative accounting of overages and underages. Instead, the proposer asks the board to believe that the 20% allocation will work out in the end without any mechanism to ensure this.

From 1984 to 2008 the number of non-resident anglers grew by about 7-1/2% per year. While temporarily stopped by worldwide phenomena- the Recession that began in 2008 and the recent COVID-19 pandemic, there is every reason to believe that this growth will continue in the future. Contrary to what the proposer wants the BoF to believe, *a fixed bag limit is not an effective constraint on total harvest as the number of anglers increases.*

¹Page 68 of ADF&G sportfish division's Special Publication No. 21-10 Overview of the Sport Fishery for King Salmon in the Southeast Alaska through 2020: A report to the Alaska Board of Fisheries by Patrick Fowler et al. indicates that "In 1989, however, sport harvest began a rapid increase due primarily to increases in fishing effort and harvest in outer coastal areas in Sitka and Prince of Wales Island (PWI) as well as increases in hatchery returns. Total (sport) harvest increased from 31,100 in 1989 to 60,500 in 1991." That is to say the sport catch nearly doubled in 3 years!



This is figure 3 from ADF&G sportfish division's Special Publication No. 21-10 Overview of the Sport Fishery for King Salmon in the Southeast Alaska through 2020: A report to the Alaska Board of Fisheries by Patrick Fowler et al. Note that the number of non-resident anglers has increased steadily except for the Great Recession of 2008 and its aftermath.

In the absence of a major recession or a pandemic, an increasing number of non-resident anglers will lead to an ever-higher sport harvest, as happened in the early 1990's. Hence, since this proposal lacks any means to stem such inflation, it will not maintain the 80%/20% sharing but instead will result in a major re-allocation of the limited Chinook quota to the charter industry. The accepted 80-/20 split can only be maintained if any sort of borrowing is accompanied by specific provisions to ensure that the loan is repaid. This proposal, is asking the BoF to force the troll fleet to give the sport sector a line of credit, without offering a repayment schedule or even a cap on the maximum size of the loan. No bank would lend under those conditions and the troll fleet shouldn't be forced to do so either. Before extending a loan, a bank would insist on establishing a maximum loan amount, a fixed repayment schedule, penalties for failing



to make the agreed upon payments and a profitable interest rate. The troll fleet deserves no less.

Furthermore, the non-resident annual limits mandated for lower quota tiers (f, g & h) under this proposal are substantially more generous than currently allowed. Even without any increase in effort, these limits would result in sport catches much higher than the historic catches which exceeded the 20% allocation share. The overage would accumulate to the point that it could not be made up without lengthy sustained periods of very high abundance. While such a rosy scenario would solve a lot of problems, neither the BoF nor industry should count on it occurring.

Additionally, the members of the BoF should also be fully aware that any version of the Sportfish Management Plan that lacks a firm separation between the sport and troll allocations will produce a great many proposals next cycle from sports fishermen seeking to raise their bag limits, and from trollers seeking to reduce the sport limits. This was the case in the 1980s and early 1990s. Since then, the firm 80/20 allocation has eliminated the incentive for such proposals and the board no longer has the duty of deliberating on dozens of such purely allocative sport king salmon proposals. A forward-thinking BoF would prevent this gear war by reaffirming, not tearing down the wall between the sport and troll allocations.

Proposals 85 & 86: SUPPORT- As a quasi-subsistence activity, the resident sport king fishery deserves the highest priority when allocating the resource. The current management plan already includes this level of protection when the quota is at a very low tier under 5 AAC 47.055 (h) (5). There is no reason that residents shouldn't be prioritized when abundance is higher too. The new electronic logbooks required of charter guides allow ADF&G Sportfish Division to confidently project the year-end harvest early in the season, thus providing time to fine-tune non-resident limits well in advance, rather than having to suddenly close fisheries because data wasn't analyzed until it was too late. Given that clear priority and protection for the resident fishery is already in regulation for the times of lowest abundance, there is no reason that this



protection should not be extended to times of larger quotas too. Note that the language of Proposals 85 & 86 that prioritizes residents is the subject of the 1st amendment that I propose in my discussion of Proposal 82 which would apply it to all tiers. See that section of this letter for more information.

Proposal 88: OPPOSE- After further reflection, even the proposer has withdrawn support for this proposal. Note that this proposal is not internally consistent. Section (i)(1) sets the resident limit at 2 kings per day when the quota is at a moderately low level, yet in section (h)(1) the limit drops to one king per day in years when the quota is higher!

Proposal 89: OPPOSE- This is a permit-stacking proposal.

- The troll fishery does not need permit stacking. It would increase the price of permits reducing the appeal of what is now an affordable entry to commercial fishing.
- Changing the historic gear allowance would alter ADF&G's historic relationships between CPUE and abundance since the unit of troll effort would no longer be standardized. In the face of uncertainty managers tend to become conservative- and rightly so. This proposal would potentially reduce total troll harvest in the name of caution.
- This proposal would benefit big boats with well-capitalized owners at the expense those with fewer resources and owners of boats physically too small to operate 6 lines without tangling gear.

Proposal 90: SUPPORT- This primarily house-keeping proposal would align the triggers of the existing provision to carryover uncaught winter quota into spring with the CPUE metric which was adopted by Alaska as part of the 2019 Pacific Salmon Treaty Agreement rather than continuing to be based on the computer model Abundance Index which is no longer used for management by the state of Alaska. Because the CPUE metric involves six flat tiers rather than a continuously increasing scale, under this proposal, there is a small additional range of abundance where unused winter quota will



be transferred to spring by increasing the spring area quotas by 250-500 fish. However, this should not be a concern because:

- 1) The spring fishery has been greatly constricted and per BoF directive, occurs only in those areas where it is known that SE wild stocks are scarce and
- 2) Overall spring troll harvest is thus down greatly from recent years. As such, even with slightly higher quotas in the few remaining areas, the total spring harvest will remain much lower than it used to be, and with the fishery restricted to areas with very few SE wild fish, the harvest of SE wild stocks is proportionally lower yet.
- 3) The only reason that the carryover bonus does not already apply in low abundance years is that when it was proposed the Alaska Trollers Association wanted to assure a summer quota large enough to support a July opener of 4-5 days so the provision was not permitted to take effect in years when the quota was low. This concern does not apply now because:
 - a) Under the current tiered system, the quota is the same across the entire tier regardless of what the exact abundance is.
 - b) Under the 2018 restrictions on the spring and winter fisheries, the spring and winter harvests have been reduced so much that more of the quota than in the past will remain for summer, even if the treaty cap is increased by 500 kings in each spring district.
- 4) Due to the highly conservative restrictions on where spring fishing is allowed, the concerns over SE wild stocks being caught in the spring troll fishery are overblown. The historic projections of SE wild Chinook in the spring catch are misleading, since they include many districts that are no longer open under current management.



Proposal 91: OPPOSE- While the stated purpose of this proposal is to manage the July summer troll king opening so as leave enough quota that the August opening lasts 4-15 days, the proposal is unduly complicated, awkward and only marginally effective at accomplishing this goal.

- Example 1: 2020-Under the current management plan the July opener ran 6 days and the remaining quota was adequate for a full 15 more days in August. Had Proposal 91 been in effect, the July opener would have been shorted by a day in order to increase the length of the August opener by an estimated 4 days. This would have extended it beyond the 4-15 day target length.
- Example 2: 2018-this proposal would have entirely eliminated the August opener on the supposition that the 75,000 fish summer quota was too small to support two reasonable length openers. However, under existing management, the July opener lasted 14 days and the August opener 5 days.

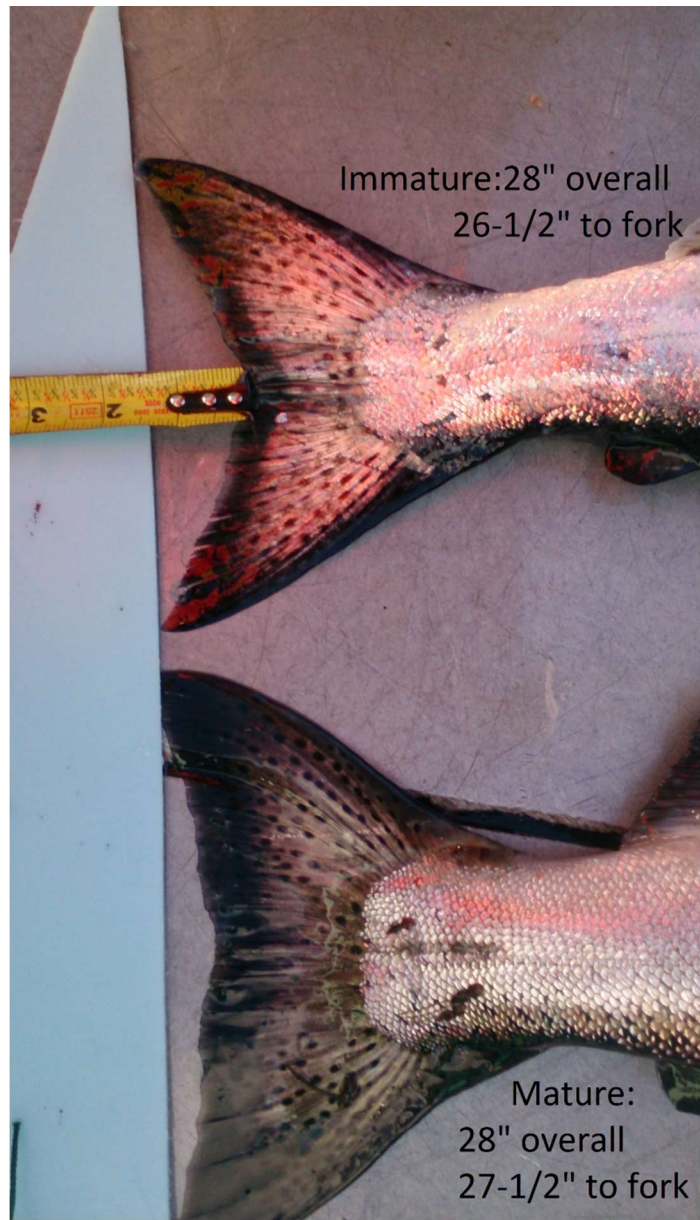
In keeping with the old saying, "If it ain't broke, don't break it!", I don't think that the issue that the proposer seeks to address needs fixing at this time, but if the BoF is convinced that constraining the August opener to a period of 4-15 days is a necessary objective, they should instead amend this proposal to simply require that the length of the July opening be managed in-season so as to achieve this. It will be far easier for department staff to determine when to close the July fishery utilizing actual harvest data from that season than it is for the BoF to manage this aspect of the fishery years in advance of the actual fishing.



Proposal 92: support AMENDED version- This proposal as written would reduce the size limit for king salmon caught in spring hatchery THAs from 28" overall to 26" overall in order to increase the harvest of early-maturing male jacks. However, that would necessitate a different set of rules within THAs compared to other spring troll fisheries. That would be highly inconvenient for enforcement and for any troller that fishes THA and non-THA waters on the same trip. Instead, I suggest that the *minimum size limit in all troll areas during the spring season change from 28" overall to 26-1/2" from the snout to the fork of the tail.*

This alternative has the following advantages:

- Immature kings have deeply forked tails as shown in the top specimen in the picture to the right. This immature fish is 28" overall, but the tips of the tail extend 1-1/2" past the fork. Hence this immature fish is only 26-1/2" to the fork of the tail, that being the equivalent to the existing 28" overall minimum. *Thus, the proposed amendment would not change the number or stock composition of immature kings being kept.* These fish can and should be released to grow bigger.
- The tails of mature spawners on the other hand have a much shallower fork. The mature jack in the lower portion of the picture is also





28" overall, yet the tips of the tails extend only ½" past the fork. Hence, the proposed amendment would allow trollers to retain mature kings as short as 27" overall.

- A consistent rule in all spring areas is easier to enforce and doesn't require the fisherman to offload 26"-28" fish caught in the THA prior to fishing in other waters
- The fork length is a more consistent measurement than the overall length, as the latter can vary up to an inch depending upon how the fish's tail is positioned. This has led to honest fishermen getting citations for fish that pointed their tail when they came aboard, but went into rigor mortis with a flared tail.
- About 15 years ago, ADF&G staff switched from an overall length to a fork length measurement for their biological data because it is more consistent since it doesn't depend upon how the fish holds its tail.
- Many Alaska hatchery stocks are returning to spawn at younger ages than they used to. Two-ocean jacks are much more common than in the past. They tend to be 27"-33" long. So, while most of them met the current 28" minimum size, a fair number of them are just short, but would be legal for trollers to keep under this amendment. In the past there were few of them, so catching one under 28" was a rarity. Now, there are many more jacks, and I release several each spring that are barely too short.
- Allowing trollers to retain more Alaska hatchery fish would help to reduce the troll deficit under the SE Enhanced Salmon Allocation Management Plan. Per 5 AAC 33.364, the hatchery fisheries are supposed to be managed so that trollers catch 27-32% of the hatchery fish. For more than 2 decades, the troll share has significantly lagged this allocation. Allowing trollers to retain these hatchery kings (that gillnetters and seiners have long been allowed to keep) would be a small step towards addressing this imbalance.
- In the event that anybody does raise a potential concern over the possibility that a very small number of mature SE wild Chinook might be caught and retained despite spring troll fisheries being conducted exclusively in areas



where SE wild stocks are rare, the BoF should keep in mind that the only fish that would be affected by the amendment would be those between 26-1/2" fork length and 28" overall. Official escapement counts of SE wild stocks are limited to "large kings", i.e. fish bigger than 28" overall, so this *proposed change would not result in any decrease to the escapement counts*. Furthermore, mature kings under 28" are precocious jacks, small males that typically are redundant to reproductive success anyway- so it is with good reason that they are not included in the spawning escapement counts.

The only new fish that could be retained under a 26-1/2" fork length would be mature (i.e. Alaskan) fish with an overall length of 27-28". Since 2018 when the current restrictions went into effect there have been 153 CWTed Alaskan king salmon sampled from the spring troll fisheries that were approximately 28"-29" in overall length. The stock composition of this subset should be nearly identical to that of the 27-28" Alaskan fish that could be retained with a 26-1/2" snout to fork minimum. Of these 153 fish only one (out of 4 years of data) was a SE wild stock (from the Unuk). All of the rest were hatchery fish. As outlined above, even had it not been caught, this fish was too small to have been included in escapement counts anyway.

- Under the requirements set by the BoF in 2018, spring trolling is restricted to areas that have a low prevalence of SE wild Chinook. That leaves hatcheries as the only local producer of kings in waters open to trolling in the spring, so virtually all of the mature fish caught during the spring troll fishery are Alaskan hatchery kings. There should be no conservation concerns or Treaty concerns with harvesting more of these mature fish since nearly all of them are hatchery fish and all of them are small.
- CWTed adults are somewhat shorter on average than the non-CWTed fish in their hatchery cohort². Thus, the slightly smaller fish that would be allowed to be retained under a 26-1/2" fork-length minimum size would make the overall CWT rate in the spring troll catch more representative of the overall return.

² See *The Effects of Adipose Fin Clipping and Coded Wire Tagging on the Survival and Growth of Spring Chinook Salmon* by Geraldine Vander Haegen and H. Lee Blankenship in the August 2005 edition of the North American Journal of Fisheries Management

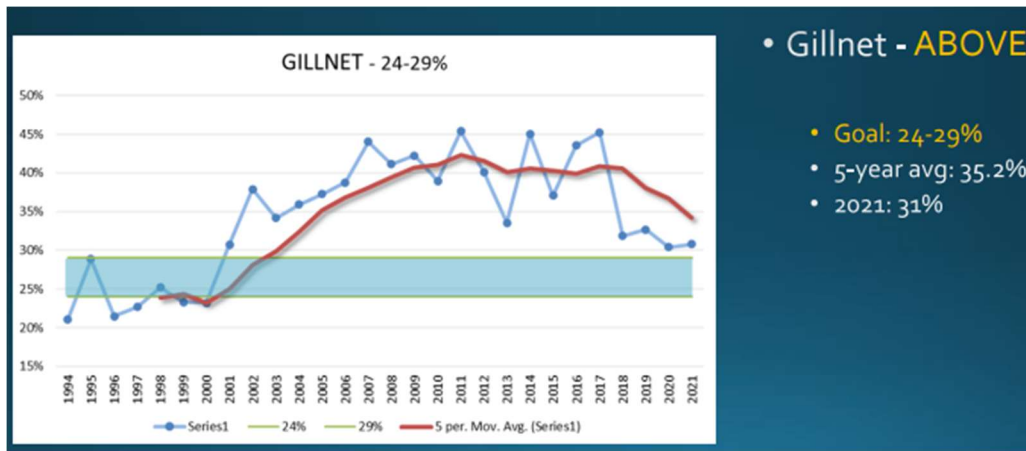


Currently, by being required to release small fish, trollers are selecting for non-CWTed fish, thereby distorting the stock composition when the tags are expanded.

Proposal 95: SUPPORT- The newly implemented electronic logbook requirements for charter guides allow ADF&G to closely monitor the harvest of the majority of the sport anglers. This proposal would direct the department to use this information to adjust limits in-season in order to manage the fishery to the sport quota. While it wasn't in regulation at that time, this is exactly what was done in 2020 when it became apparent that due to the COVID-19 pandemic, non-resident sport effort was much lower than usual, and as a result the sport harvest was down as well.

Proposal 99: OPPOSE- This proposal (sponsored by the seiners) would assure the seine fleet of the maximum harvest of hatchery chum salmon within the SE Cove THA at the expense of the troll fleet. While the 2 days of seining: 5 days of trolling ratio is already in regulation, the greater efficiency of seine gear means that with a seine fishery every 3 or 4 days, the chum never get a chance to build up enough to provide for good trolling. The trollers are currently well behind their allocated share of hatchery-produced salmon under 5 AAC 33.364 the SE AK Area Enhanced Salmon Allocation Management Plan. Under the 13th finding of BoF finding 94-148FB, THA fisheries should adjusted to make up that deficiency. Hence, trollers, not seiners should be the ones to set the rotation for their benefit within the existing guidelines.

Proposal 100: SUPPORT- Over the most recent 5-yr period the gillnet share of hatchery salmon has been 35.2% of the total commercial harvest of hatchery salmon in SE. This is well above the 24-29% goal set by the BoF in finding 94-148FB and codified in 5 AAC 33.364 the SE AK Area Enhanced Salmon Allocation Management Plan.



Above is slide 28 from the NSRAA presentation to the 2021 Seine Task Force, a link to which can be found at https://www.nsraa.org/?page_id=65. As the chart clearly shows, the gillnet fleet has been harvesting well over their allocation of hatchery fish for two decades. While the gillnet share is not as large as it was a decade ago, it is still consistently over their allocated range.

The BoF in finding 94-148FB, #13, directs that the proper remedy for an imbalance such as this one is to adjust the management of fisheries in hatchery terminal areas. Hence, it is completely appropriate that gillnetters not be allowed to fish in the SE Cove THA, at least until such time as their 5 year average drops below their 24-29% allocation range. The BoF will most certainly meet again before this happens, so there is no need to allow for the possibility of a gillnet fishery in SE Cove at this time.

Proposal 112: OPPOSE- this proposal would allow deeper gillnets (90 mesh vs 60 mesh) in District 11 beginning with stat week 34. District 11 includes the estuaries of both the King Salmon River and the Taku River. The Chinook run in the former was designated as a Stock of Concern in 2018, and the Chinook run in the latter is proposed as a Stock on Concern at the current time. While Taku kings are thought to typically rear in distant waters (except possibly as very young fish), the King Salmon River Chinook are a hyper-local rearing stock and likely to spend their entire lives in District 11 where the gillnet fishery takes place. Deeper gillnets will greatly increase the catch of immature feeder Chinook.



Proposal 114: SUPPORT- This proposal would allow commercial Hand Trollers to use downriggers (presumably hand-cranked only) during not just the winter fishery, but year-round. While some members of the law enforcement community have opposed similar proposal in the past, on the instinctive thought that it might cause identification problems for them, following a careful consideration of all possible scenarios I was unable to think of a scenario where this proposal would make it any more difficult to determine if a fisherman is sportfishing or commercial trolling than it already is.

- A fisherman fishing with a sport rod in an area or time that is closed to commercial fishing is clearly sportfishing. This would be true whether he is fishing with or without a downrigger. So, the proposal would make no difference in this scenario.
- If a fisherman in a licensed commercial boat is using a rod in an area open to commercial trolling, then there should be no need to be concerned about whether he is sport fishing or commercial fishing at that particular time. This is equally true whether the fisherman is using a downrigger or not.

Proposal 115: SUPPORT-This proposal would open the winter troll season on the beginning of stat week 41, rather than waiting until Oct 11 (which typically falls near the end of week 41 or sometimes in week 42).

- This provides partial mitigation to winter trollers for the loss of the March 15-April 30 portion of the winter fishery that occurred at the 2018 BoF meeting as a measure to conserve local wild Chinook.
- The winter fishery brings much higher prices than the summer fishery, so increasing the number of fish caught in winter increases the value of the resource.
- While some members of the Alaskan delegation to the Pacific Salmon Commission's Treaty negotiations who are hesitant to "stir the pot" might try to claim differently, the latest treaty agreement specifically allows the winter fishery (and the associated index fishery in District 113) to begin as early as the first day of Week 41. This language (rather than specifying October 11th) was carefully preserved in the treaty language to maintain the BoF's traditional freedom to make adjustments to our fisheries without undue constraint by Treaty commitments.



- The traditional start date for the winter fishery was Oct 1 (which typically falls in week 40). It was advanced to October 11 in 1993 at the request of the troll fleet for internal allocation purposes to limit the winter catch. The severe truncation of the last six weeks of the winter season by the BoF in 2018 greatly reduces winter harvest, so delaying the opening to October 11 is no longer needed.
- Over the last 5 years, Alaska hatchery fish have comprised about 20% of the October winter troll catch. These fish are funded by a 3% tax on commercial salmon landings, and don't count against the Treaty quota. By allowing more fishing time in October, the trollers can take advantage of this opportunity to catch additional fish that we have already paid for at a time of year when very few SE wild stocks are mixed into the catch.
- Contrary to the staff comments that express concern over changing the length of the index fishery, this proposal makes the length of the surveyed period a consistent 56 days/year rather than varying each year from 47-53 days. Stability will improve, not detract from the ability of the index to forecast abundance. Historical precedent is a poor excuse for continuing to do something poorly. In the case of an index, inconsistency is clearly a bug, not a feature!

Proposal 116 OPPOSE (reluctantly)- I understand the motivation behind this proposal, and once even drafted one similar to it. However, I learned that the Pacific Salmon Treaty Agreement that governs Chinook harvest in SE, was negotiated with the expressed understanding that a certain percentage of released kings would not survive. The troll fishery has greatly reduced their release mortality since the first version of the Treaty was negotiated in the 1980s. The current treaty agreement has separate limits that were agreed to by all parties for landed Chinook and for incidental mortalities. Ironically, this means that further reducing our incidental mortalities below the already low number by retaining these fish as the proposer suggests, does not provide any benefit to trollers since it would reduce the number of other kings that can be kept during the king openers. This would require shortening the summer troll king openers,



and thereby increasing the number of days when kings cannot be kept. This would actually increase the number of kings that must be released.

Note that if instead of separate limits for landed catch and incidental mortality, the terms of the Treaty had a single limit for the combined mortality caused by Alaska's fisheries, I would potentially come to a different conclusion on this concept.

Proposal 117: COMMENT- The proposer is good friend of mine, so while I am hesitant to be on record opposing his proposal, the BoF should be fully aware that in addition to creating enforcement challenges, this is a highly allocative proposal between large vessels capable of effectively running 6 lines and smaller boats that can not do so without tangling their gear.

Proposal 144- SUPPORT – The sport rental boat industry has grown significantly since the imposition of sport halibut regulation that are more restrictive on guided anglers than on unguided anglers. However, these fishermen target other species too. This growing rental fleet is now large enough that their harvest is probably significant enough that it should be documented separately and included in ADF&G's in-season data analysis. ADFG's claim that they are not aware of any reason to be concerned by the level of catch by rental boat clients is a disingenuous circular argument since the point of the proposal is to gather data that doesn't currently exist. The BoF should not be fooled into thinking that the absence of data is adequate proof that the problem doesn't exist.

The Board of Fisheries has long supported the concept of logbooks for rental boats. This was suggested as far back as 1992, as documented by this excerpt from page 5 of the BoF Findings 93-142-FB dated March of 1992 regarding the allocation of Chinook.

In order to improve catch reporting and assist in management of the recreational fishery, the department may:

- Establish a mandatory log book program to monitor the harvest and effort of guided sport anglers (charter boats and fishing lodges), outfitters and dry skiff rentals.



Proposal 155- SUPPORT with AMENDMENT **to prohibit removing a salmon from the water if it is a species that must be released**- In 2018 the BoF closed most of the inside waters of SE to king salmon retention during the spring spawner run to protect the local wild stocks. However, the intended level of protection was not fully achieved due to out-of-state fishermen targeting these fish for catch-and-release opportunities. While the fish might be ultimately released, this is all too often preceded by netting the fish and holding it up for pictures, etc. If the BoF is not willing to prohibit these catch-and-release fisheries, it should be required that the fish be carefully released without being removing from the water.

The second portion of the proposal would prohibit using treble hooks- even when the fisherman intends to take the fish home. This is unnecessarily restrictive and I do not support this portion of the proposal.

Proposal 158: SUPPORT with AMENDMENT- I support the philosophy of forgoing the harvest of young rapidly-growing fish in order to be able to catch them later when they are bigger and more valuable. While the proposal as written would require a pre-season bait or test fishery, that is not a financially feasible means of establishing the age-composition. In lieu of the test fishery, since the department always publishes a forecast of the age composition of the spawning stock as soon as their computer model has been run, I suggest that **in the years when the model predicts that 80% or more of the return will be less than 5 years old, that the sac roe fishery be cancelled.**

- The sac roe industry did this voluntarily in 2020 when the 4-year-old cohort was predicted to dominate the return.
- The sac roe market has a strong preference for fish over 110-120 grams. It takes fish at least 5 years on average to obtain this size. Before that, they are worth very little.
- Herring grow so rapidly through their first 5 years, that a cohort of herring will have a larger biomass as 5-year-olds than as 4-year-olds. Thus, uncaught 4-year-olds will not only be much more valuable per pound in the following year, but actually will increase in weight too, as the growth of the individual surviving herring outpaces the natural mortality.



- The scenario encompassed by the proposal is akin to the recent blackcod situation. In 2019, >70% of the blackcod biomass was fish 5 years old or less. For a species that is known to live for decades, such an imbalanced age structure carries both great promise and great risk. As a blackcod IFQ holder, I have been increasingly appalled when the quota has been raised repeatedly just as these barely-mature fish are entering the fishery.
- Given the longstanding hostility between the sac roe industry and the proposer, as a BoF member, you should be prepared to expect that the industry will oppose this proposal on instinct, without even stopping to consider the possibility of economic benefit.

Proposal 160: OPPOSE- the proposer's description of the issue begins with "(The closed waters) have been increased 3 time in the last ten years under the *guise* of increasing reasonable subsistence harvest opportunities based on the *purported* failure of the subsistence harvester to reach the *artificially inflated* 136,000 to 227,000 pound 'Amount Necessary for Subsistence'." I find the italicize terms in that sentence to be inappropriately disrespectful. This sort of attitude should not be rewarded by the BoF.

Proposal 161- OPPOSE- this proposal would impose an unnecessary burden on a long-established subsistence activity. The subsistence take does not pose any sort of conservation risk, nor is there any reason to believe that the eggs are illegally entering commerce. In general, the BoF should be looking to reduce the paperwork requirements on Alaskan subsistence fisheries, not increase them.

Proposal 162- SUPPORT- Current regulations allow for a resident subsistence gatherer to get a permit that allows the harvest up to 158 pounds of herring roe on macrocystis kelp (or 32 pounds if they are the sole member of their household), then return the permit to Fish & Game, and exchange the permit for a second one of the same poundage allowance. I sponsored this proposal to eliminate the need for Sitka subsistence gatherers to return to the Fish and Game office after harvesting half of their allowed limit and to increase the limit to a more easily measured quantity. Requiring the



harvester to make two trips to the grounds means requiring twice the time, twice the fuel and risks storm-driven sand or other events spoiling the resource in the meantime. In the past I have been unable to harvest my full allowance when the second trip was delayed due to bad weather, an adverse tide cycle, or other obligations, to the point that the eggs were no longer good to harvest.

Prior to the explosion of the sea otter population, macrocystis kelp was not as common as it is now, so perhaps there was a concern of over-harvest of kelp when this proposal was originally implemented. Thanks to the otters nearly wiping out the kelp-eating urchins, that has not been an issue for many years. Consequently, commercial roe-on-kelp fisheries are allowed to take hundreds of blades of macrocystis each without any thought of depletion of the kelp resource, so allowing subsistence harvesters to take a bit more kelp shouldn't be an issue.

Proposal 184: OPPOSE (for consistency sake)- the BoF and ADF&G have historically sought to provide for clearly distinguishable method and means between sport fisheries and Personal Use/Subsistence fisheries. It would be contrary to this long-standing philosophy for longlined shrimp pots to be allowable gear in both sport and P/U shrimp fisheries. Unless ADF&G intends to fully reverse this principle (which is of questionable value in my opinion) I suggest the BoF clarify that while P/U shrimp pots may be longlined, sport shrimp pots must be single set. If ADF&G does intend to continue to support this proposal, this would mark a change in their philosophy and it should be noted when the board deliberates on Proposal 224 as well.

Proposal 185 & 186: SUPPORT- While the seawater temperatures have cooled off in the last few years and squid are again very scarce, it seems likely that they will again return in quantities sufficient to support a sport fishery in the future. When that happens, it would be desirable if sport fishermen could be allowed to use lights and multiple lighted lures to attract squid as is commonplace in other areas with rod and reel squid fisheries.

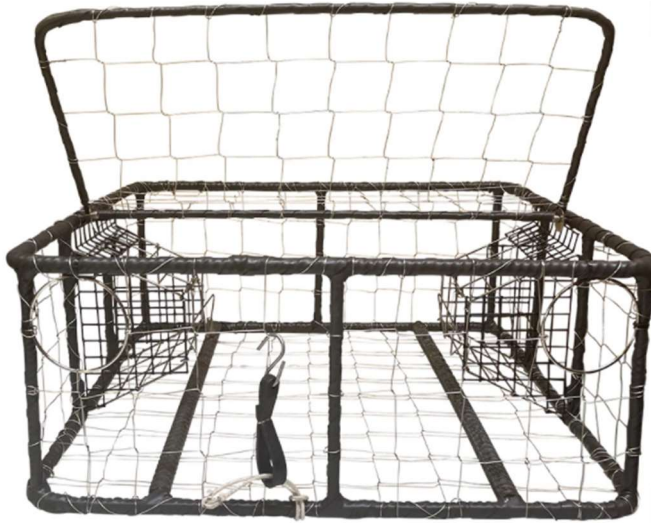


Proposal 190- OPPOSE-The current regulations require that pre-season surveys estimate that at least 200,000 pound of legal male red king crab are present before opening a fishery, but this proposal would allow a fishery on less than half of that amount.

- The survey is inherently an imprecise tool and generates an imprecise estimate. The 200,000-pound threshold acts as a buffer against an estimate that indicates a surplus erroneously. If there truly is a small surplus available, it is ok to leave it in the water to accumulate towards next year's quota.
- If small surpluses are harvested every year that they are thought to exist, (and potentially when they aren't even really there) it will take an extraordinary recruitment event to ever reach the 200,000-pound threshold for a competitive fishery. The current buffer allows small surpluses to accumulate over multiple years until there is enough crab for a competitive fishery.
- This is an allocative proposal, not just between competitive and non-competitive commercial crabbers, but between commercial and Personal Use crabbers. Currently, limited Personal Use fisheries are allowed when there is a harvestable surplus < 200,000 pounds. Allowing commercial fisheries to routinely sweep up these small amounts will increase the number of years when there is no harvestable surplus and thus the P/U fishery will be shut down more frequently.
- With commercial fisheries occurring much more frequently, even on stocks with very small surpluses, there will be fewer large old dominant male crab in the spawning population.



Proposal 214- OPPOSE- This is a solution in search of a problem. There is no biological



LESTER'S SQUARE COMMERCIAL CRAB
POT
☆☆☆☆☆

\$225.00

or legal need for a commercial Dungeness pot to be circular. Plenty of sport pots are square or rectangular. While I am not a commercial crabber, I have seen some of these square pots used in the commercial fishery. The Pacific Fishing magazine ran a story on the Custom Crab Pots company that started making square commercial Dungeness pots in 2015. Among their other attributes, square pots stack more efficiently on deck.

This is a screenshot from <https://lesterscrabpots.com/> of a square-shaped commercial Dungeness crab pot offered for sale.

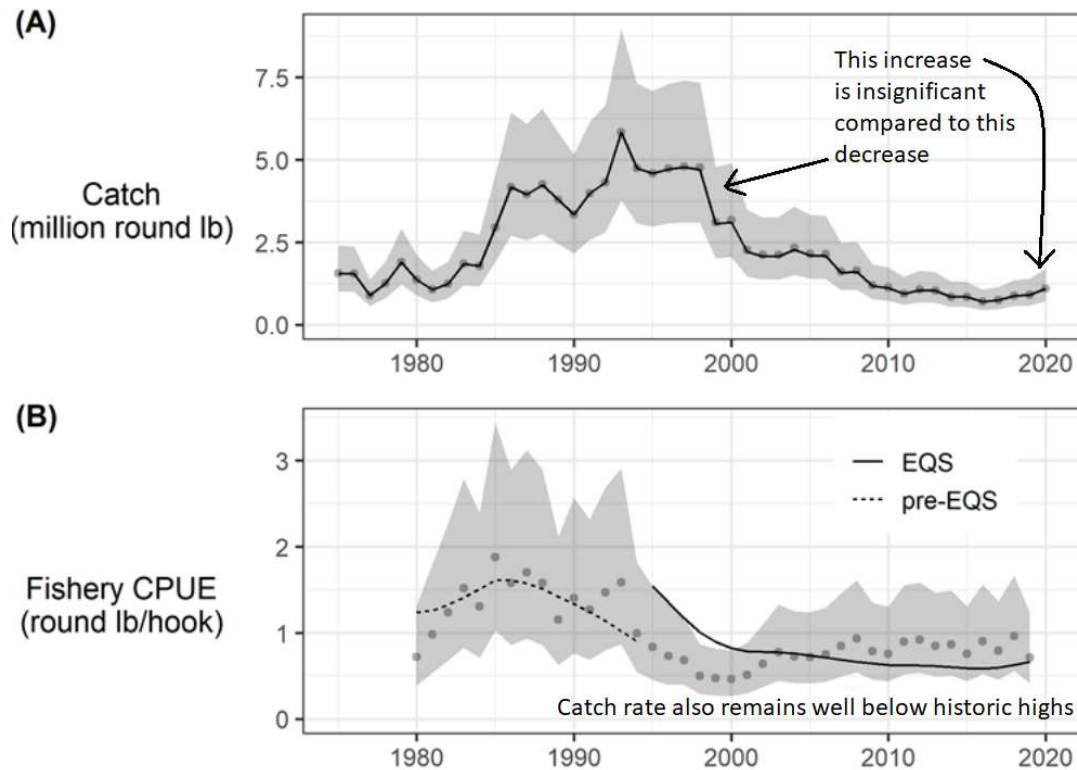
If ADF&G or the BoF feels that there is a need to limit the size of pots from an efficiency standpoint, the area of the pot's footprint could be used rather than the diameter. A round pot with a 50" diameter has a footprint of 13.62 square feet. So, a square pot of equivalent footprint would be 3'8" on each side. In short, just because square or rectangular pots lacks a "diameter" is not a good reason to stifle innovation in pot design.

Proposal 222- SUPPORT as AMENDED- There is no need to require mandatory retention of thornyhead rockfish. Unlike most rockfish, thornyhead do not have a closed swim bladder and thus can resubmerge and survive release. Far better to encourage excess thornyhead to be returned to the water to live another day, than to mandate that they be retained simply so that they can be counted.



Proposal 224- SUPPORT- Rod and reel ought to be allowed for personal use and subsistence rockfish. When somebody is looking for a fish or two for dinner, it makes much more sense to use rod and reel than to use a longline which requires making two trips to the grounds and might catch more fish than wanted. With the recent closure of the sport rockfish season, local residents lack a means to easily catch a rockfish for dinner. When I made a similar proposal (Proposal 243 in 2012), the department opposed it on the grounds that "Enforcement becomes difficult when the same gear is used in two or more fisheries with different bag limits, season, and areas." However, ADF&G must have changed their philosophy during the submittal period preceding this board cycle as they have sponsored proposal 184 which would allow sport shrimp pots to be fished longline style in a manner identical to Personal Use and Subsistence shrimp gear. The BoF should recognize the submittal of ADF&G proposal 184 as a strong rebuttal to any claim from ADF&G that using identical gear in multiple fisheries is inherently problematic.

Proposal 225: OPPOSE - The proposal as written arbitrarily increases the annual limit of sablefish on the grounds that the biomass is larger than it was a few years ago. However, this slight increase has been minimal in the context of a fuller history. If the BoF would like to adopt abundance-based limits, the baseline should be much higher than the arbitrarily-picked 1M lb level. The Northern SE Inside waters GHL was over 1,500,000 pounds when the sablefish bag limits were originally established by the BoF. This proposal would increase the bag limit even though the allowable harvest is less than it was at that time. If the BoF is interested linking the bag limit to abundance, the bag limit should actually go down, not up from the original level. However, this proposal lacks any provision to do so regardless of how low the stock goes.



This is Fig 2 from page 16 of ADF&G's RIR 1J21-13 *Northern SE Inside Sablefish Management Plan and Stock Assessment for 2021* by Rhea Ehresmann and Andrew Olson. The top graph (A) shows that while the allowable catch has slightly increased in 2020, it is still very low by historic standards and has been relatively flat for over a decade.

Independent of the computer model used to determine the allowable catch, the lower graph (B) shows that the actual productivity of the stock as measured by catch per effort, has not changed in over the past decade and also remains well below the high of the 1980s and early 1990s. In short, the arbitrary 1M lb. ABC threshold that Proposal 225 sets for increased sport limits, is an inappropriately low bar for a fishery that once supported catches of around 5M lbs./year.

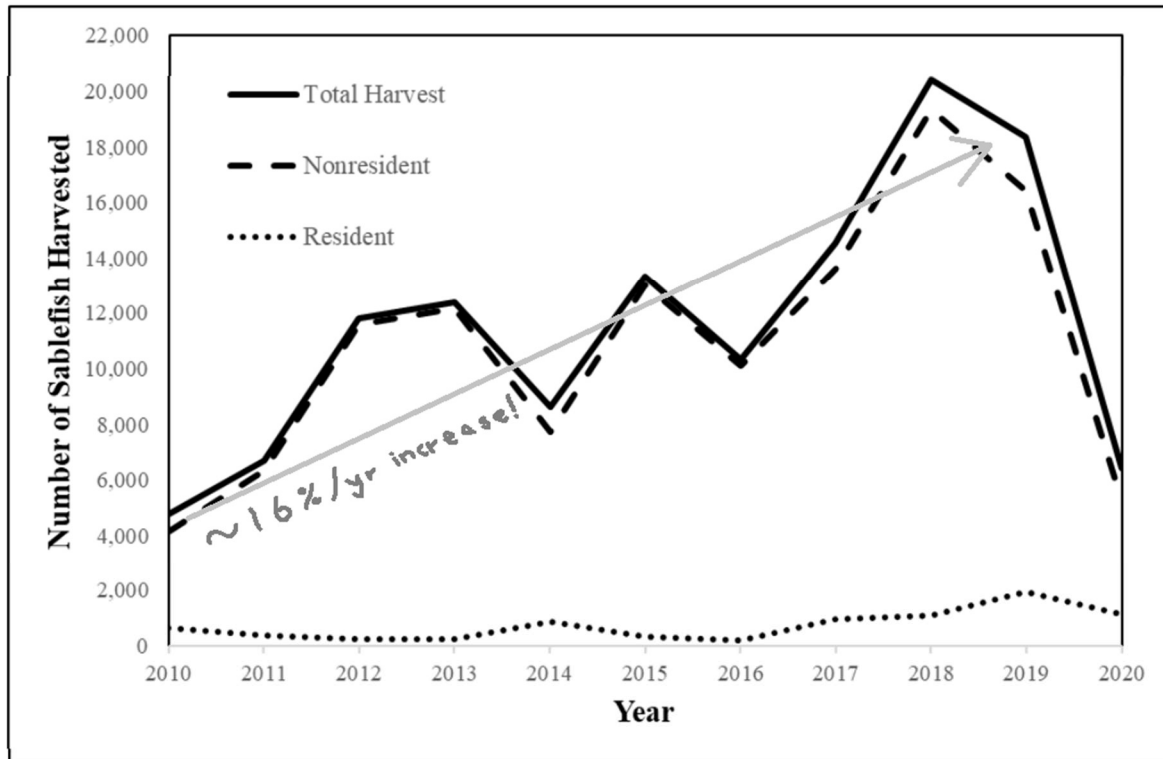


Figure 13.—Statewide Harvest Survey (SWHS) estimates (numbers of fish) of sablefish in the Southeast Alaska sport fishery 2010–2020.

Furthermore, as shown in Figure 13 from RC 3 Tab 5 above, the current 4 fish bag limit which was first imposed in 2009 (based on the 2008 GLH) have not constrained the sport harvest of sablefish. Rather it has grown rapidly, increasing more than 5-fold from 4,793 fish in 2010 (the first year that the SWHS asked about blackcod) to 20,431 in 2018. Only the 2020 Covid pandemic has been able to reverse that trend.

Proposal 226 support with AMENDMENT-The slope rockfish subgroup should also include thornyhead. Thornyhead are also a deep-water rockfish species found in similar habitat, as the other species being proposed to be included in the slope rockfish assemblage, but because they are biologically classified as genus *Sebastolbus* rather than *Sebastes* they are currently excluded from any bag limits. From the point of view of an angler, the difference in genus means very little. Purely as a result of being in the genus *Sebastolbus*, currently there is no sport limit on thornyheads. Historically this was a non-issue as they were rarely encountered since they live in such deep water, but with more and more effort directed at blackcod, they will become an increasingly common



catch. Thornyheads are extremely long-lived and the status of the stock is concerning enough that Alaska does not authorize any directed commercial fisheries for these fish.

Proposal 230- SUPPORT- I sponsored this proposal to provide a resident priority for Demersal Shelf Rockfish (DSR). While DSR levels are down from their pre-exploitation highs, they are stable or increasing over the past 7 years. After a downward trend prior to 2010, catch levels were greatly reduced in 2013. This resulted in the stock stabilizing by 2015.

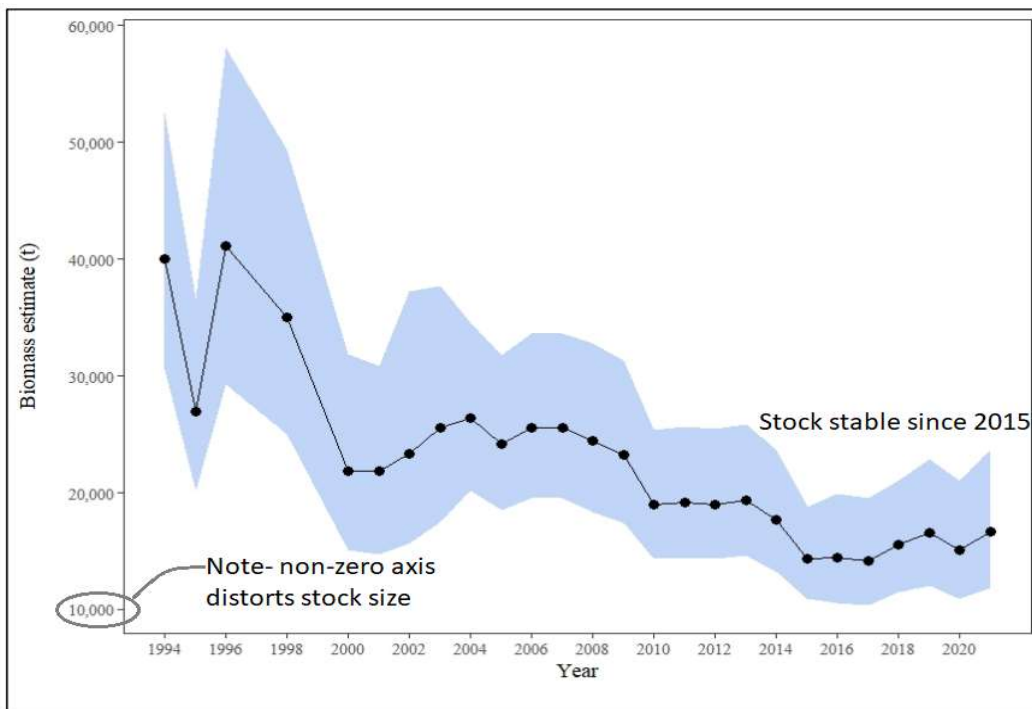


Figure 227-3.—Yelloweye rockfish biomass estimate (t) (solid line) and 90% lower and upper confidence intervals (blue) for Southeast Outside (SEO) waters, 1994–2021.

This is figure 227-3 from Staff Comments RC2. Note that the population has been stable or rising since 2015. There is no need for the recent drastic closures of 2020-21.

Restoring the 2006-2010 resident sport bag limit of 3 DSR including up a single yelloweye, does not pose a conservation threat. Per Staff comments RC2, the historic resident DSR harvest was only 6.3 tons when the proposed limit was last in effect. In contrast, 124 tons (54%) of the 231-ton TAC remained unharvested in 2020.



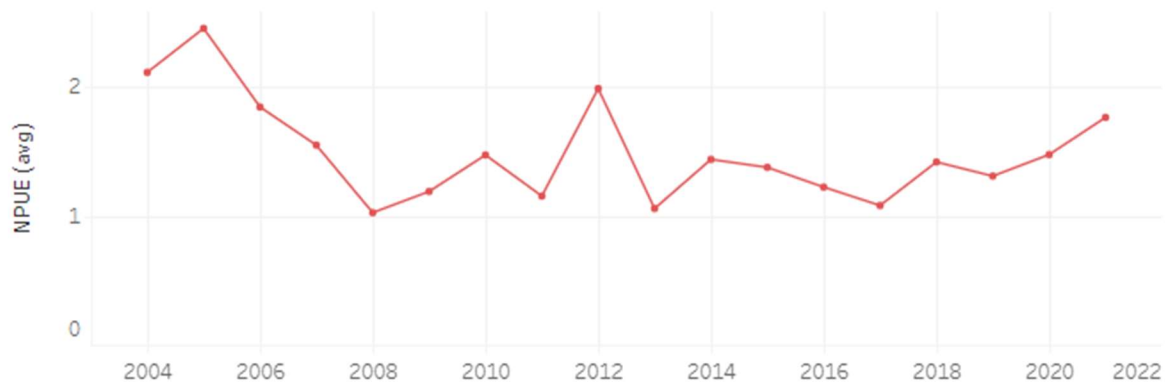
Table 1.—Mortality of demersal shelf rockfish (DSR) in metric tons (t) from research, directed commercial, incidental commercial, sport and subsistence fisheries in the Southeast Outside Subdistrict, 1992–2020, and total allowable catch (TAC) for commercial and sport sectors combined (modified from Wood et al. 2020).

| Year | Research | Directed ^a | Incidental ^{d,f} | Sport ^b | Subsistence ^c | Total ^d | TAC | Sport allocation | Sport fishery realized % of sport allocation | Sport fishery realized % of TAC | All fisheries realized % of TAC |
|-------------------|----------|-----------------------|---------------------------|--------------------|--------------------------|--------------------|-----|------------------|--|---------------------------------|---------------------------------|
| 1992 | — | 351 | 119 | — | — | 478 | 550 | — | — | — | — |
| 1993 | 13 | 341 | 188 | — | — | 534 | 800 | — | — | — | — |
| 1994 | 4 | 383 | 219 | — | — | 604 | 960 | — | — | — | — |
| 1995 | 13 | 168 | 103 | — | — | 271 | 580 | — | — | — | — |
| 1996 | 11 | 350 | 85 | — | — | 436 | 945 | — | — | — | — |
| 1997 | 16 | 280 | 100 | — | — | 380 | 945 | — | — | — | — |
| 1998 | 2 | 241 | 120 | — | — | 361 | 560 | — | — | — | — |
| 1999 | 2 | 242 | 126 | — | — | 367 | 560 | — | — | — | — |
| 2000 | 8 | 187 | 107 | — | — | 295 | 340 | — | — | — | — |
| 2001 | 7 | 178 | 146 | — | — | 324 | 330 | — | — | — | — |
| 2002 | 2 | 136 | 149 | — | — | 285 | 350 | — | — | — | — |
| 2003 | 6 | 105 | 169 | — | — | 275 | 390 | — | — | — | — |
| 2004 | 2 | 173 | 155 | — | — | 329 | 450 | — | — | — | — |
| 2005 | 4 | 42 | 195 | — | — | 237 | 410 | — | — | — | — |
| 2006 | 2 | 0 | 203 | 75 | — | 280 | 410 | 66 | 114 | 18 | 68 |
| 2007 | 3 | 0 | 196 | 60 | — | 259 | 410 | 66 | 91 | 15 | 63 |
| 2008 | 1 | 42 | 152 | 68 | — | 263 | 382 | 61 | 111 | 18 | 69 |
| 2009 | 2 | 76 | 139 | 37 | — | 254 | 362 | 58 | 64 | 10 | 70 |
| 2010 | 7 | 30 | 131 | 52 | 8 | 228 | 287 | 46 | 113 | 18 | 79 |
| 2011 | 5 | 22 | 87 | 36 | 6 | 156 | 294 | 47 | 77 | 12 | 53 |
| 2012 | 4 | 105 | 76 | 46 | 7 | 238 | 286 | 46 | 100 | 16 | 83 |
| 2013 | 4 | 130 | 83 | 34 | 7 | 258 | 296 | 47 | 72 | 11 | 87 |
| 2014 | 5 | 33 | 63 | 40 | 7 | 148 | 267 | 43 | 93 | 15 | 55 |
| 2015 | 4 | 33 | 70 | 48 | 8 | 163 | 217 | 35 | 137 | 22 | 75 |
| 2016 | 4 | 34 | 79 | 48 | 7 | 172 | 224 | 36 | 133 | 21 | 77 |
| 2017 | 5 | 32 | 92 | 45 | 7 | 181 | 220 | 35 | 129 | 20 | 82 |
| 2018 | 6 | 51 | 79 | 40 | 7 | 183 | 243 | 39 | 103 | 16 | 75 |
| 2019 | 10 | 45 | 76 | 47 | 7 | 185 | 254 | 41 | 115 | 19 | 73 |
| 2020 ^a | 6 | 0 | 87 | 7 | 7 | 107 | 231 | 37 | 19 | 3 | 46 |

As shown in Table 1 of RC3 Tab 9 (reproduced above) the 2014-2019 all-gear harvest was much reduced from earlier years. The stability of the stock since then as shown in the previous chart reflects that there was no need for the extreme further harvest reduction imposed in 2020 (and continued in 2021). Note that the all-gear mortality has only even approached the Total Allowable Catch (TAC) once in the past 30 years (way back in 2001).



Yelloweye Rockfish NPUE (count/100-hook skate)



This screenshot from the IPHC website shows that the encounter rates of yelloweye rockfish in the halibut survey in SE Alaska was more or less constant for a decade from 2008-2017 and has recently been increasing. The IPHC survey data independently verifies the health and stability of the yelloweye population. The IPHC survey includes extensive coverage of all of SE, and is conducted annually in the same stations, unlike the much more limited ADF&G survey that is on a multi-year rotation between small areas. Simply stated, *neither the DSR stock assessment, nor the IPHC survey data provides any justification for the extreme harvest reductions that ADFG has recently imposed on the DSR fisheries.*

Furthermore, resident anglers have never been the cause of the historic increased harvests. This is clearly shown in Fig 9 from RC3 Tab 9 to right.

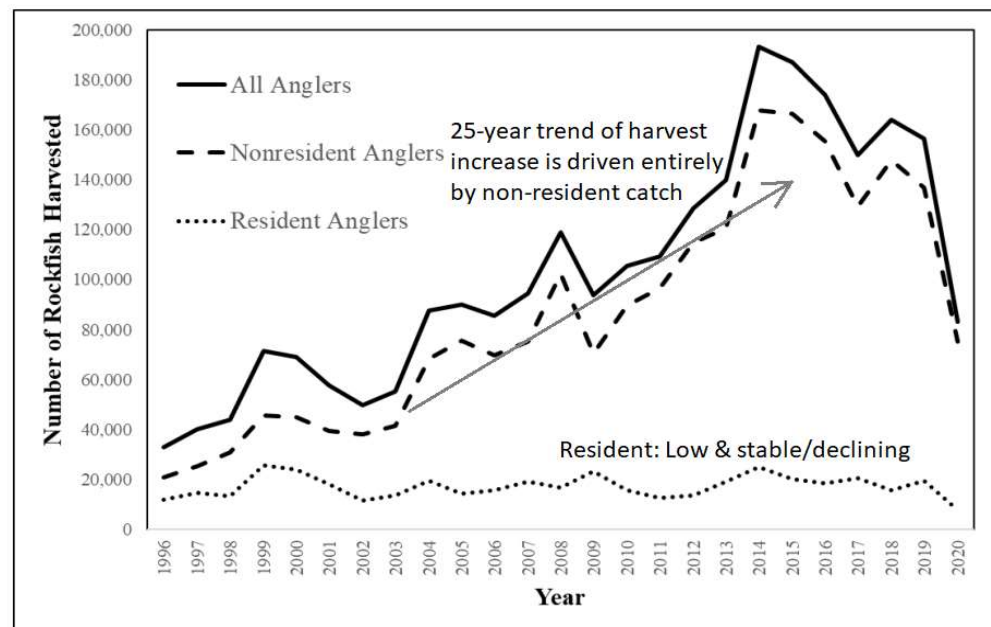


Figure 9.—Estimated harvest of rockfish in sport fisheries of Southeast Alaska as derived from the Statewide Harvest Survey (SWHS) by angler residency for years 1996–2020.



Resident harvest has been small, and stable or decreasing for 25 years. On the other hand, *"In the last 5 years (2016-2020), nonresidents have taken an average of 89% of the total rockfish sport harvest in Southeast Alaska."*³ Residents are not the cause of the increased harvest, do not pose a threat to the resource, and deserve to have their access to DSR restored.

The department justifies opposing this purely allocative proposal due to the 6.3 ton increase in harvest that it would allow. This is absurdly conservative management when there is over 100 tons of unused TAC remaining. Furthermore, the department is clear (RC 2 page 245) that *"it is unlikely that the sport allocation would be exceeded solely due to resident harvest..."* so both the TAC and the sport allocation have adequate fish to allow residents to keep a few to eat. In 2020, the majority of the TAC went unharvested. Simply put, an underharvest of this degree is poor management and should not be supported by the BoF.

Comments on Northern SEAK King Salmon Stock Status & Action Plan, 2021 (RC6)

- **King Salmon River-MSY is inappropriate:** The size of this run (~100 fish) is far too small to support a directed fishery, or even contribute meaningfully to the mixed stock fisheries. As such it is inappropriate to apply Maximum Sustainable Yield (MSY) management to this stock. There is relatively little benefit to maximizing the yield of a stock of this size compared to the costs of doing so by restricting harvest of other stocks. It would be better to use a SEG (Sustainable Escapement Goal) rather than an MSY goal, as the appropriate management concern for this stock is one of sustainability, not maximum yield.
- **King Salmon River- Harvest:** Page 4 states accurately that *"Harvest estimates of the King Salmon River king salmon are not available because the stock contribution in marine fisheries has not been determined."* Similarly, page 15, correctly reports that *"Rearing areas, returning adult migration routes, and run timing for King Salmon River king salmon are unknown"*. Page 12 starts off accurately with *"...there is no CWT (coded wire tag) information available for*

³ From page 16 RC3 tab 9

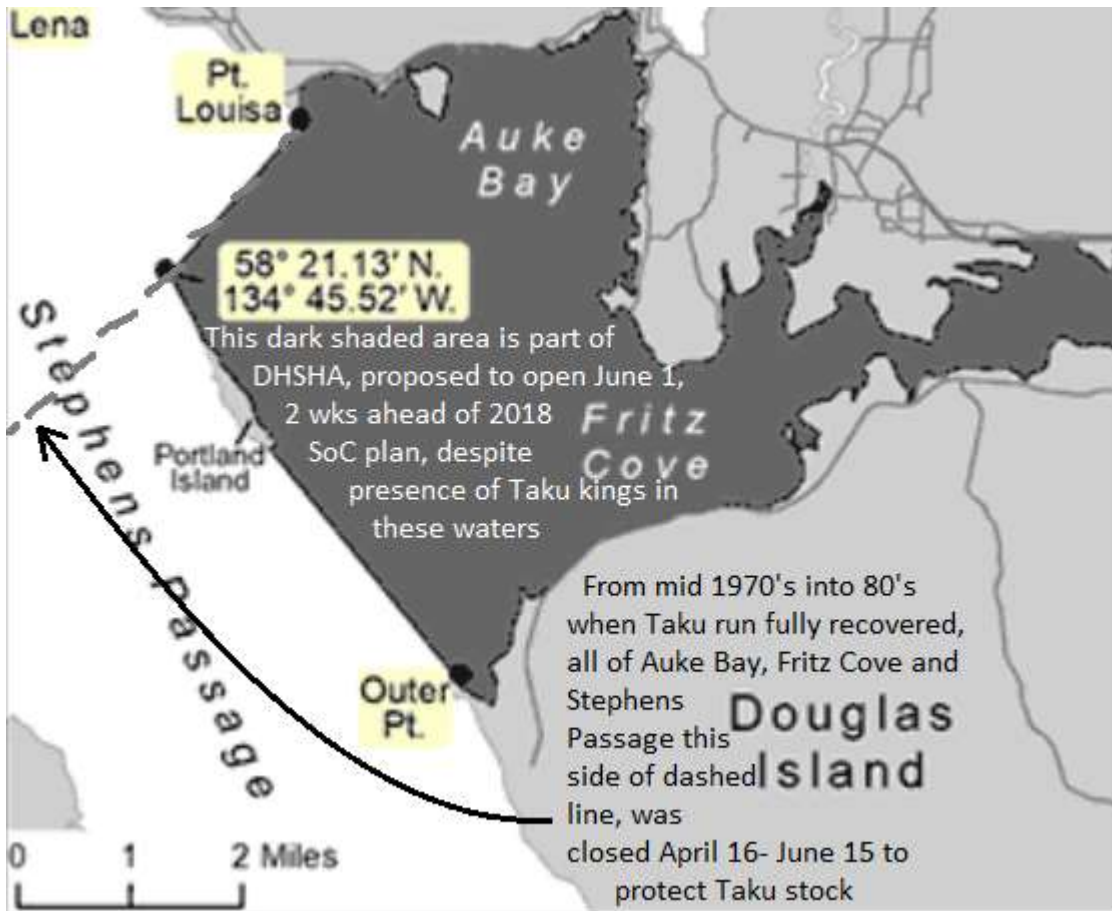


the King Salmon River stock of king salmon..." but the authors somehow conclude from this void of information that "...*harvest of Taku, Chilkat and Stikine Rivers and Andrew Creek stocks of king salmon can serve as indicators for when and where King Salmon River fish are harvested since the King Salmon River is geographically close to these systems...*" This conclusion is pure speculation. It is unsupported by any data relevant to the King Salmon River. Furthermore, aside from being northern SE Chinook stocks, the Taku, Stikine, Chilkat, and Andrew Creek stocks are known to have very little in common with one another. The first two are early-returning (April-May) outside-rearing stocks, while the latter two are later-returning (June-July) inside-rearing stocks. How can they all be similar to the King Salmon River stock when they aren't even similar to one another?

What little information can be inferred about King Salmon River Chinook migration comes from recoveries of CWTed King Salmon River brood stock fish released from DIPAC hatchery in the mid 1990's. These fish were nearly all caught in Stephens Passage or Lynn Canal near the Juneau release site, with 80% of them being caught in the local sport fishery. Given this minimal migration, it is quite likely that many wild King Salmon River Chinook never leave Seymour Canal.



- **DHSHA vs. District 103-104 run timing:**

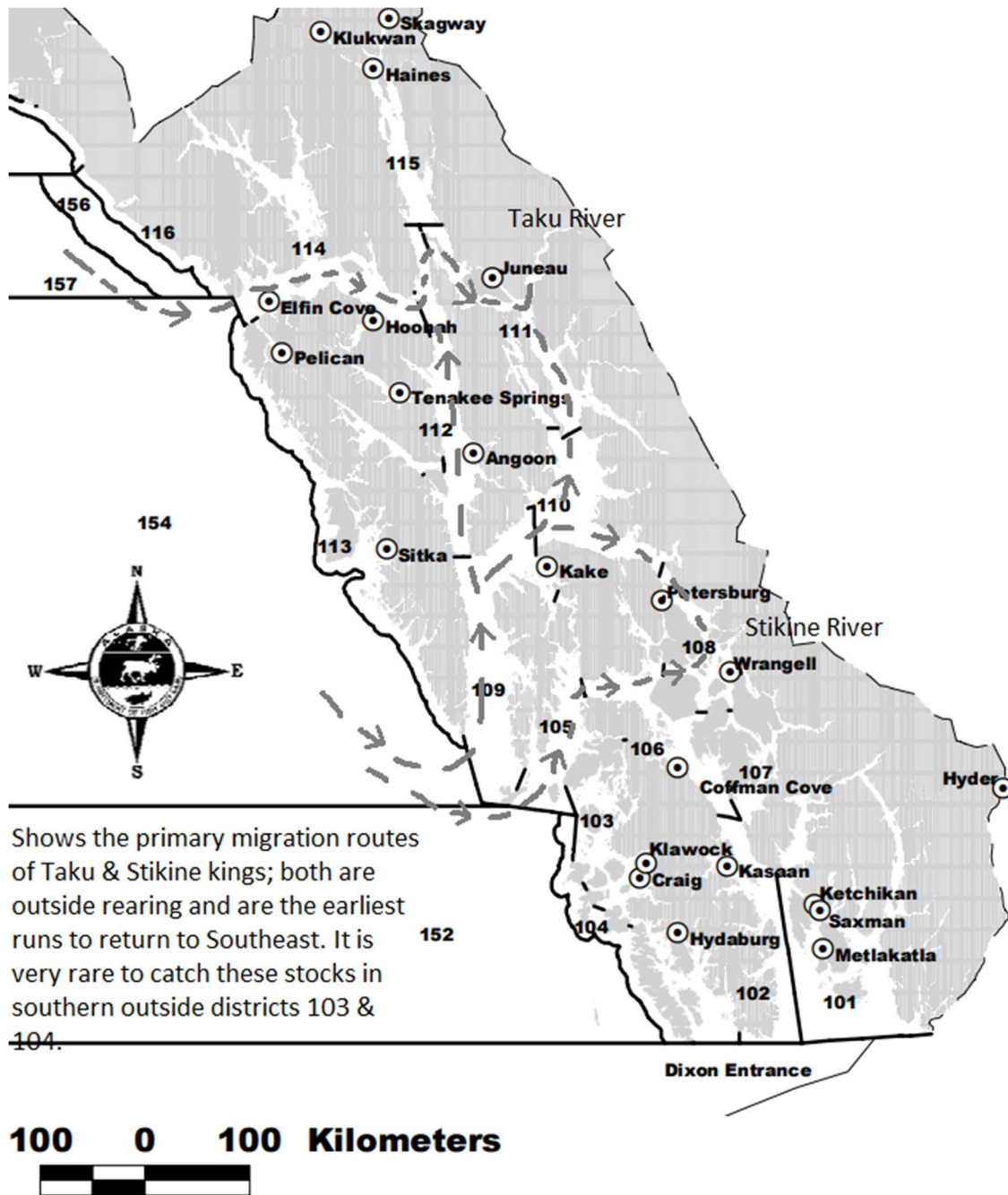


Under Sport options A & B, the DIPAC Hatchery SHA (DHSHA) would open on June 1, which is 2 weeks earlier than the June 15 date approved by the BoF in 2018, even though the DHSHA is near the mouth of the Taku River and also along the migration corridor for Chilkat fish and many CWTed Taku kings have been caught in this water in the past. In 1976, the last time that the Taku Chinook run was similarly depressed, nearly all of the DHSHA area was closed until June 15.

Troll Options A & B do not include the easing of any of the 2018 restrictions, even though the troll sector was the most severely impacted of any gear group and operates far from the rivers of concern. If the DHSHA is indeed opened two weeks earlier than under the BoF's 2018 plan, an equitable concession should be offered to the troll fleet as well. Allowing the winter king fishery to remain open through the end of March in Districts 3 and 4 would be an appropriate match and would create almost no risk of



catching fish from one of the stocks of concern, as Districts 3 & 4 are outside waters well south of typical migration pattern of the early-returning Taku & Stikine fish. *Since 1977 there has never been a CWT from a wild Alaska Chinook recovered in these districts in March or early April.* (For the record, I have never fished those districts and have no intention of doing so in March even if they were open, but I propose them here because they are biologically low risk.)





- Potential for unwarranted spring troll closure:** Option C would close the few remaining northern SEAK spring troll fisheries. This would be an extraordinarily excessive choice. Tables 1 & 4 of RC 6 report a troll harvest rate of zero Chilkat and Taku kings respectively since the 2018 restrictions. It should be clear that the troll fishery has been cut to the point that further restrictions will have no meaningful biological benefits, whereas they will impose significant burdens. The spring season gives the troll fleet the highest value per Treaty Chinook. With prices over \$100 per fish, the Sitka area spring troll fisheries alone generated about \$1M for Alaskan trollers in 2021. If that quota had been left until July, the flooded market and scarcity of Alaskan hatchery fish (which are “bonus” fish above the Treaty quota) would have caused the majority of that value to have evaporated.

Table 1.—Escapement, harvest, total run, and harvest rate by fishery of large (\geq age 5) king salmon in the Chilkat River, include some age 4 fish.

| | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 ^d |
|------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------------------|
| Escapement ^a | 2,674 | 1,723 | 1,719 | 1,529 | 2,452 | 1,380 | 1,173 | 873 | 2,028 | 3,180 |
| Harvest | 1,094 | 1,032 | 398 | 1,090 | 706 | 323 | 239 | 196 | 87 | 79 |
| Total Run | 3,768 | 2,755 | 2,117 | 2,619 | 3,158 | 1,703 | 1,412 | 1,069 | 2,115 | 3,259 |
| Harvest Rate: | | | | | | | | | | |
| Troll Winter | 0.03 | 0.04 | 0.00 | 0.00 | 0.00 | 0.02 | 0.04 | 0.00 | 0.00 | 0.00 |
| Troll Spring | 0.03 | 0.05 | 0.02 | 0.00 | 0.02 | 0.00 | 0.03 | 0.00 | 0.00 | 0.00 |
| Troll Summer R1 ^b | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Troll Summer R2 ^b | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Troll All | 0.06 | 0.10 | 0.02 | 0.00 | 0.03 | 0.02 | 0.07 | 0.00 | 0.00 | 0.00 |

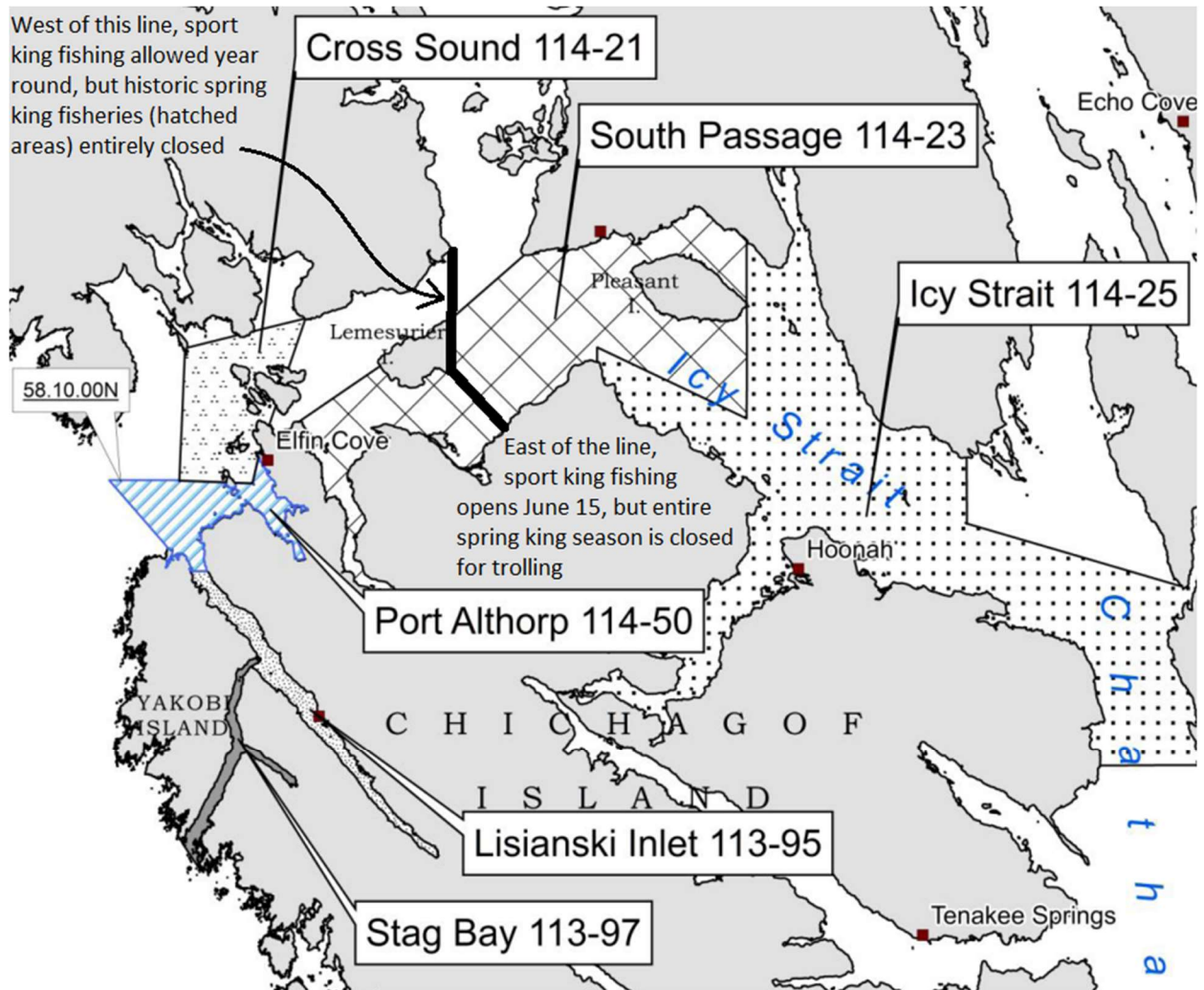
Note: All zeros since SoC plan in 2018!

Table 4.—Escapement, harvest, and total run of large (\geq age 5) king salmon in the Taku River, 2011–2020. Harvests inc

| | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 ^c |
|------------------------------|--------|--------|--------|--------|--------|--------|-------|-------|--------|-------------------|
| Escapement ^a | 19,672 | 16,713 | 18,002 | 23,532 | 23,567 | 9,177 | 8,214 | 7,271 | 11,558 | 15,593 |
| Harvest | 8,051 | 8,526 | 3,191 | 5,886 | 4,944 | 3,938 | 1,122 | 58 | 420 | 582 |
| Total Run | 27,723 | 25,239 | 21,193 | 29,418 | 28,511 | 13,115 | 9,336 | 7,329 | 11,978 | 16,175 |
| Harvest Rate: | | | | | | | | | | |
| Troll Winter | 0.00 | 0.09 | 0.03 | 0.01 | 0.01 | 0.01 | 0.05 | | | |
| Troll Spring | 0.13 | 0.08 | 0.06 | 0.06 | 0.02 | 0.10 | 0.01 | | | |
| Troll Summer R1 ^b | | | | | 0.01 | | | | | |
| Troll Summer R2 ^b | | | | | 0.01 | | | | | |
| Troll All | 0.13 | 0.16 | 0.09 | 0.07 | 0.05 | 0.11 | 0.06 | | | |



- **Lack of troll/sport parity in Icy Straits spring fisheries:** Under all Options, the charter fishery in western Icy Strait is allowed to continue without any concessions towards the Taku and Chilkat kings migrating through this corridor. Prior to 2018, there were spring troll fisheries in much of this area that were all closed by the BoF for SoC reasons in 2018. There was no CWT sampling of the charter catch out of Elfin Cove or Gustavus in 2020 or 2021 due to Covid concerns, so the stock composition of the recent catch is unknown, but if 5 separate spring troll subdistricts in these same waters were all entirely closed, either the non-resident sport fishery in the same waters deserves to be on the list of potential restrictions under Options A, B and C, or else these spring troll fisheries ought to be restored. The Stag Bay (113-97) and South Passage (114-23) subdistricts each had but a single CWT from a SoC recovered from more than a decade of spring troll openings, and the Cross Sound subdistrict had only two SoC CWTs recovered in thirty seasons!
- Furthermore, while sport fishing for king salmon thorough the central and eastern parts of Icy Strait and Chatham Straits is justifiably allowed to reopen on June 15, the spring troll fisheries in the same waters remain closed through the end of spring season (June 30). This discrepancy should be addressed too by allowing the historic spring troll districts to reopen on the same date as the nonresident sport fisheries occurring the same waters.



This map from the ADF&G's 2011 Spring Troll Management Plan shows the areas that previously had been open on a weekly rotation for spring king trolling prior to the 2018 SoC plan. None of them have been open for spring king trolling since. The waters west of Lemesurier Island are open to sport king fishing all spring and the waters east of Lemesurier Island open to sport king fishing on June 15.

Thank you for taking the time to consider my opinions,

Tad Fujioka
FV Sakura

Submitted By
Taylor White
Submitted On
12/22/2021 9:51:55 PM
Affiliation



PC347
1 of 1

I support management strategies that promote herring population viability concurrent with traditional, customary, subsistence herring and egg use. I, therefore, support herring proposals 156, 157, and 158.

As a lifelong Sitkan, I have noted concerning variability and decline in the abundance of herring eggs at my annual harvest sites. My observations pale compared to the local Tlingit generational knowledge and adaptive management of local herring populations. The Pacific herring is a cultural keystone species for the Tlingit and other Indigenous people, and risky, highly discounted management strategies may reduce herring populations and contribute to the erasure of traditions and cultures (Thornton & Moss 2021). I therefore strongly oppose proposals 160, 161, 165.

Inclusive and equitable ecosystem-based fisheries management would be ideal for this and similar fisheries (Karnauskas et al. 2021). However, I empathize with the demands that would necessarily come with creating such a model (i.e., time, staffing, fieldwork, additional stakeholder engagement, and inclusions of evolutionary ecology, climate modeling, and socio-ecologic systems, and diverse knowledge systems).

With the cultural importance of the species, concerns of continued access to harvest, subsistence (STA v State of Alaska case #: 1SI-18-212C1 (2018)), decreasing market prices (Funk et al. 2001), and a legacy of herring overfishing and population collapse, I support more conservative proposals to harvest tonnage, herring sizes, and age classes.

References:

F. Funk, J. Blackburn, D. Hay, A.J. Paul, R. Stephenson, R. Toresen, & D. Witherell. 2001. Herring: Expectations for a new millennium. University of Alaska Sea Grant, AK-SG-01-04, Fairbanks. 721-739.

Karnauskas, Mandy & Walter, John & Kelble, Christopher & McPherson, Matthew & Sagarese, Skyler & Craig, Kevin & Rios, Adyan & Harford, William & Regan, Seann & Giordano, Steven & Kilgour, Morgan. 2021. To EBFM or not to EBFM? that is not the question. Fish and Fisheries. 22. 10.1111/faf.12538.

Thornton, T. F., & M. Moss. 2021. Herring and People of the North Pacific: Sustaining a keystone species.

Submitted By
Tele Aadsen
Submitted On
12/22/2021 8:02:14 PM
Affiliation



PC348
1 of 5

Phone
3603037770
Email
nerkasalmon@gmail.com
Address
3739 Birch Way
Anacortes, Washington 98221

Re: Proposal 82 - SUPPORT

My name is Tele Aadsen & I'm a second-generation salmon troller, raised on my parents' boat, crewed on a variety of vessels in a variety of fisheries, running the F/V Nerka with my partner for the past 16 years. I support Proposal 82 with the amendments from the Sitka AC. I encourage the Department to take full advantage of in-season management tools to keep the mostly non-resident guided sport fishery and emerging bare boat charters to stay within the sport allocation without taking fish away from resident sport fishermen and the mostly resident commercial troll fleet.

Submitted By
Tele Aadsen
Submitted On
12/22/2021 7:59:25 PM
Affiliation



PC348
2 of 5

Phone
3603037770
Email
nerkasalmon@gmail.com
Address
3739 Birch Way
Anacortes, Washington 98221

Re: Proposal 80 - SUPPORT

My name is Tele Aadsen & I'm a second-generation salmon troller, raised on my parents' boat, crewed on a variety of vessels in a variety of fisheries, running the F/V Nerka with my partner for the past 16 years. I support Proposal 80, ADFG's intent to establish provisions in regulation to address overages and payback. If one gear group goes over its allocation, they should be the gear group to forfeit fish the following year. These fish should NOT be taken out of the all-gear group quota or any other gear group that stayed within their allocation. At the same time, the Department should be given flexibility to allow one gear group to go over their allocation if and when needed to ensure that we are able to harvest the all-gear quota and not leave fish on the table.

Submitted By
Tele Aadsen
Submitted On
12/22/2021 8:32:43 PM
Affiliation



PC348
3 of 5

Phone
3603037770
Email
nerkasalmon@gmail.com
Address
3739 Birch Way
Anacortes, Washington 98221

Re: Proposal 103 - OPPOSE

My name is Tele Aadsen, second-generation salmon troller, & I oppose Proposal 103. Southeast Alaska's Crawfish chum program & healthy hatchery production are essential to multiple gear groups.

Submitted By
Tele Aadsen
Submitted On
12/22/2021 8:25:12 PM
Affiliation



PC348
4 of 5

Phone
3603037770
Email
nerkasalmon@gmail.com
Address
3739 Birch Way
Anacortes, Washington 98221

Re: Proposal 101 - OPPOSE

My name is Tele Aadsen, second-generation salmon troller, & I oppose Proposal 101. The concerns stated in Proposal 101 are unfounded & not supported by any statistical analysis. The chum fisheries that have resulted from these highly effective hatcheries have been greatly beneficial for multiple gear groups. While my personal chum fishing experience is limited to a single one-way tack through the dog patch as a teenager - almost 30 years ago - I see how the Crawfish chum program & NSRAA's work have been essential life-savers to many of my fleetmates, & to the commercial troll fleet as a whole. Healthy hatchery production diversifies our fleet & behooves us all.

Submitted By
Tele Aadsen
Submitted On
12/22/2021 8:16:37 PM
Affiliation



PC348
5 of 5

Phone
3603037770
Email
nerkasalmon@gmail.com
Address
3739 Birch Way
Anacortes, Washington 98221

Re: Proposal 83 - OPPOSE

My name is Tele Aadsen, second-generation salmon troller, running the F/V Nerka with my partner for the past 16 years. I oppose Proposal 83.

While commercial troll permits have always been capped, Southeast Alaska's charter industry is growing without any limited entry to curtail its exponential growth. Without any such limits in place, Proposal 83 will result in an open-ended reallocation of king salmon from the mostly resident commercial troll fishery to the mostly non-resident sports industry driven by charter boats and lodges.

Between the losses we all sustained during the last treaty negotiations, ongoing struggles in Southeast's own rivers, and the further restrictions we are all likely to face as a result of these stocks of concern, these are challenging times for us all. The troll fleet is not seeking additional fish to make up for these losses at the expense of another sector. To the contrary: trollers have helped pay for the production of king salmon at the regional hatchery associations with the 3% enhancement tax on all of the fish sold from our fleet. The charter fleet and lodges have for years benefitted and caught more fish as a result of this production... yet have not contributed anything to help support these local hatcheries. For the recreational sector to try to mitigate their losses by taking fish from another sector is unjust and wrong.

I strongly urge you to oppose Proposal 83. Instead, I encourage you to support Proposals 80 and 82, put forth by the Alaska Department of Fish and Game as better alternatives to bring the sport fishery into alignment with the updated framework of the SEAK all-gear catch limit and resulting sport allocation.

Submitted By
Terrance Kilbreath
Submitted On
12/14/2021 12:18:14 PM
Affiliation

Phone
14252757407
Email
tkilbreath@msn.com

Address
31 Pine Street #210
Edmonds, Washington 98020



PC349
1 of 1

I purchased my Sitka Sound Southeastern roe herring purse seine permit #GoiA 64579A in 1996.

I have depended financially on the proceeds from the use of the permit for years.

I strongly support proposals 163 and 164.

I feel equal split is the best way to maximize this resource and benefit all concerned.

Terry Kilbreath



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

November 29, 2021

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Alaska Board of Fisheries:

The following comprises the comments of Territorial Sportsmen, Inc. (TSI) on the proposals to be considered at the January 2022 meeting in Ketchikan.

Proposal 82.

Favor the Housekeeping provisions, Oppose the new language as follows:

TSI is severely concerned about a few provisions in Proposal 82, which is the Department staff proposal seeking to clarify the Southeast Alaska King Salmon Management Plan consistent with recent US-Canada treaty agreements. During a meeting with department staff in January 2021, TSI representatives expressed a desire to avoid a time-consuming disagreement at the Southeast Alaska Board of Fisheries meeting over two primary issues.

Department staff agreed to rewrite or clarify that portion of the plan where the new proposed language in subsections (f)(1) and (2) and (g)(1) and (2) are set out, as follows: “in conjunction with wild stock management measures” and “when wild stock management measures are unnecessary” These two phrases are not clear to us and we could benefit from some clarification.

The other concern expressed by TSI representatives was the new language proposed in subsection (g)(2), that added a month-long July closure for resident anglers. In response to TSI questioning, Department staff indicated the language was a “straw dog” or “placeholder” so that the Board could consider all options if it so desired. As expressed at the time, TSI representatives objected to the language for the following reasons:

1. The justification for the proposal made no mention of new language being added as a straw dog or placeholder. If that placeholder language is implied, several more options should have been included, not just one.
2. The added language for a July closure to residents had never before been a part of the King Salmon Management Plan and was never a part of the treaty.

Sportsmen Promoting Conservation of Alaska's Fish and Wildlife Since 1945



3. The language also appears only in subsection (g) and not in a lower tier [subsection(h)]. This makes little sense.

4. Since inside waters have been closed to king salmon retention for several years in April, May, and June, a July closure on top of that would assure almost no opportunity for anglers from inside waters communities to catch king salmon. The proposed language appears to be biased towards benefitting outside water communities and fisheries since the peak of the outside water king salmon abundance is usually in the rear view mirror by June 30. In other words, a July closure for residents would have far less effect on opportunity for outside water residents than for inside water residents.

5. The proposed language for a July closure for residents is not consistent with the plan's resident protection measures set out in subsections (b)(2), (3) and (4).

6. Since non-residents catch about 65-70 percent of the sport treaty quota, it makes sense to provide no in-season allocative closures for residents, and place the burden of sharing on the largest user group, the nonresidents, since they catch the majority of the fish.

Because of these concerns, TSI respectfully suggests that the July closure for residents be eliminated from the proposal. Instead, we propose inserting a nonresident closure in the plan beginning the last 7 or 8 days of June and continuing through July, as a way to control the treaty catch of king salmon. The elimination of the July closure to residents would be "paid for" by closing nonresidents one week earlier. This seems to us to be a much simpler solution that recognizes the resident protection measures set out in subsection (b) of the plan.

Proposal 83

We are opposed. The US-Canada treaty is not set up to provide allocations averaged over time. Penalties are assessed for a yearly overage, not an average over time. This proposal would be unworkable.

Proposal 84

Favor, for the reasons set out in the proposal.

Proposal 85

Favor for the reasons set out in the proposal.

Proposal 86

Favor

Proposal 88

Opposed. The nonresident sport fishery already harvests 65-70 percent of the sport treaty allocation. This proposal would increase that percentage during low abundance years. If 65-70% of the allocation is not enough, the nonresident sport fishery should be limited, not expanded.



Proposal 90

Opposed. All spring king salmon fisheries, sport and troll, are closed in northern inside waters to protect local chinook stocks bound for the Chilkat, the Taku, the King Salmon, and the Stikine rivers. Some of these fish are caught in District 13 in the spring, even though an “every fish counts” management scheme is in place in inside waters. Any liberalization of spring fishing in District 13 could increase harvest of protected northern inside waters wild stocks, particularly the later fish headed for the Chilkat and the Stikine.

Proposal 94

Favor, for the reasons set out in the proposal.

Proposal 125

Opposed. Taku king salmon stocks are in no position to undergo any harvest no matter how small.

Proposal 128

Opposed. All fisheries in Southeast Alaska are already fully utilized. New or expanded set net fisheries are inconsistent with historical fisheries and could exacerbate fishing on weak stocks.

Proposal 135

Opposed. Southeast king salmon are either in full conservation mode (Chilkat, Taku, Stikine, Unuk and others), or are already fully utilized by historic fisheries. Adding a new user group is inconsistent with king salmon conservation and management.

Proposal 139

Opposed. The proposal as written could lead to gear conflicts with existing long-standing sport and commercial fisheries. Since there are no time constraints imposed, a new fishery in Taku Inlet could exacerbate king salmon interception issues on a deeply troubled stock.

Proposal 140

Opposed

Proposal 141

Opposed

Proposals 145, 146, 147 & 148

In general, we oppose these proposals. We are opposed to any further bag limit or size limitations for residents. Creating a minimum size restriction for salmon other than king salmon makes no sense. It would create an enforcement nightmare. However, if these proposals are seriously considered, we request that it be limited to nonresidents. Also, these proposals in total deal with both salt water and freshwater salmon fishing and we propose they be considered separately.



One of the big issues with size limitations is the increased mortality rate on released fish. The ultimate impact of these proposals could lead to an increased harvest due to that additional mortality rate. That does not seem to be the objective of these proposals.

Proposal 150

Favor

Proposal 154

Opposed. The proposal is too vague. Some fisheries such as shoreside fisheries near hatcheries, are crowded and would be adversely affected. A new user group needs to be better justified.

Proposal 155

Favor the first provision, Oppose the second.

Proposal 225

Favor. It makes sense that as the commercial black cod quota goes up based on increasing stock abundance, that the sport bag limit also be increased slightly. The sport fishery has been sharing in the burden of conservation on black cod since 2009, and now that stocks are increasing the sport fishery should get a modest benefit – a small increase in the bag limit.

Proposal 227

Favor. The current rockfish restrictions are over-the-top restrictive, particularly in inside waters. What is needed in Sitka Sound is not needed in hundreds of miles of unfished coastline in inside waters of Southeast Alaska. This proposal will return a modicum of common sense to rockfish management.

Proposal 230

Favor

We appreciate the Board considering our comments and we intend to be at the meeting in January to defend our positions and support the Board process.

Sincerely,

Ryan Beason

Ryan Beason
President



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



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 opinions 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 performance 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.



Sitka Sound Herring Spawn on Kelp The Open Platform Alternative Harvest Method

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.



Sitka Sound Herring Spawn on Kelp The Open Platform Alternative Harvest Method

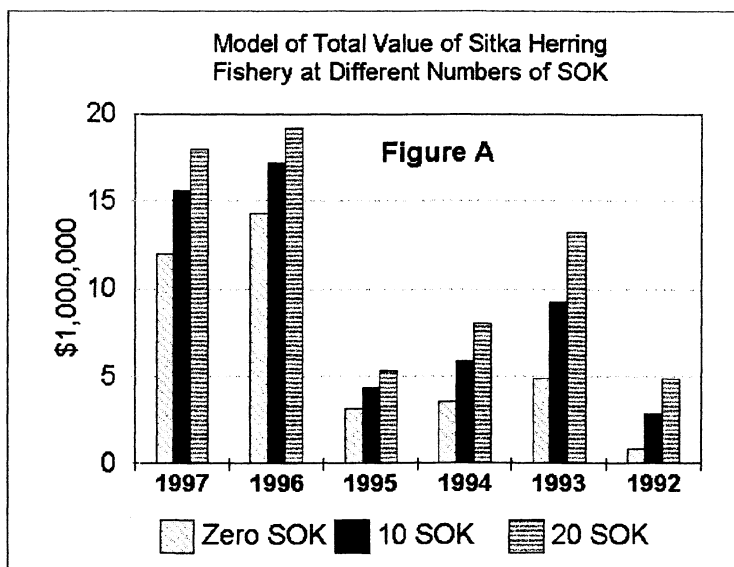
Market Opportunities

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 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

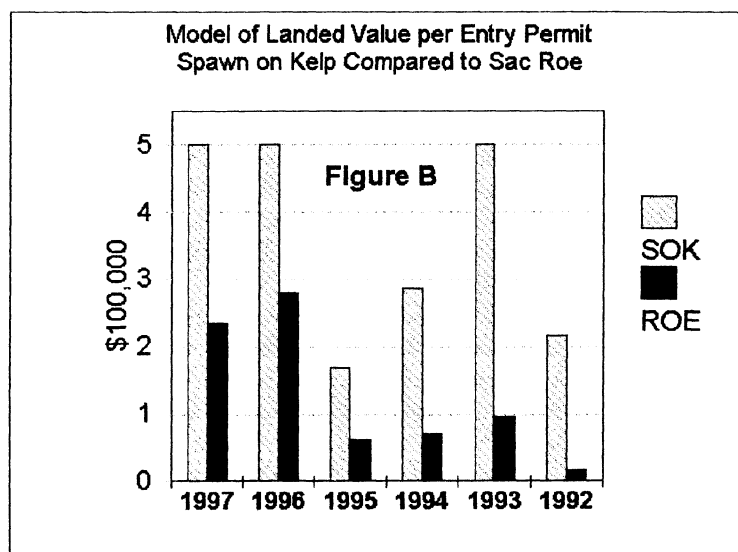




Sitka Sound Herring Spawn on Kelp The Open Platform Alternative Harvest Method

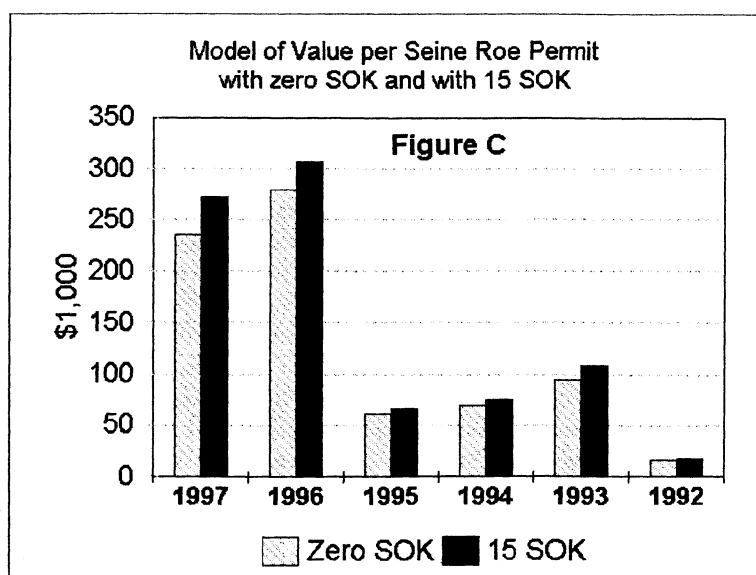
holders who harvest by the spawn on kelp method increases, the overall landed value of the fishery is projected to increase.

The second model outcome, illustrated in Figure B, is that the average annual landed



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.

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



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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 available 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

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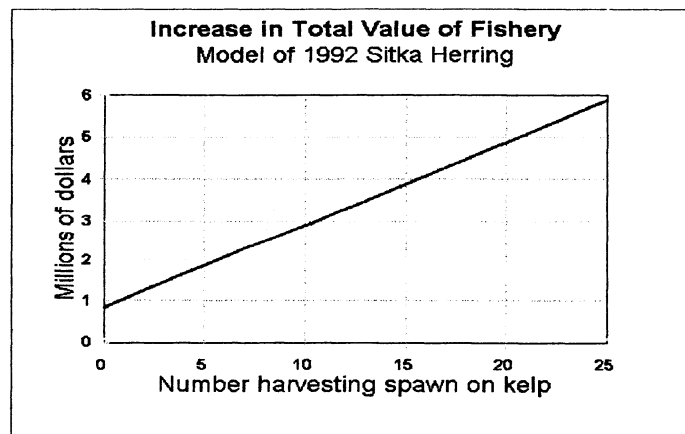


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Model Results of Open Platform Herring Spawn on Kelp Harvest Method Applied to Sitka

| 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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Submitted By
Tessa Schmidt
Submitted On
12/22/2021 6:34:17 AM
Affiliation



PC352
1 of 1

Phone
3039067732
Email
tessa.eleonore@gmail.com
Address
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



PC353
1 of 1

Phone
907-747-3232
Email
apcinc2008@hotmail.com
Address
PO Box 2300
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



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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.



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(6) *at Alaska winter troll fishery CPUEs less than 6.0 and equal to or greater than 2.6; and the department projects sport harvest allocation is going to be exceeded, the department shall, by emergency order, adjust the nonresident 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 *Overview of the Sport Fisheries for King Salmon in Southeast Alaska Through 2017: A Report to the Alaska Board of Fisheries* by Robert Chadwick et al. Note that resident harvest has 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 projection will end up outside of that range, in-season management shall be implemented to keep the harvest within the acceptable



Submitted By

Thomas Fisher

Submitted On

12/22/2021 12:23:26 PM

Affiliation

Self



PC354
4 of 4

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



PC355
1 of 1

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 purely 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 decisions without actual data of participation levels?

I STRONGLY OPPOSE 156

I STRONGLY OPPOSE 157

I STRONGLY OPPOSE 158

All these proposals seek to reduce, disrupt, 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 political attacks on the fishery with no scientific justification.

Thomas Nelson

Submitted By
Thomas Upah
Submitted On
9/5/2021 4:59:43 PM
Affiliation



PC356
1 of 1

Phone
9072011455
Email
Upah1@gmail.com
Address
8621 Solar dr
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

Email
Aknativewildflower@gmail.com

Address
P.o box 209
METLAKATLA, Alaska 99926

I support proposal 156, 157, & 158 and oppose proposals 159, 160, 161, 163, 164, 165



PC357
1 of 1

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 Strait and Chatham Strait 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



PC361
1 of 1

Phone
907-723-7914
Email
tracyrivera0@gmail.com
Address
Box 541
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



PC362
1 of 1

Phone
7346600895
Email
tscherdt@umich.edu
Address
2198 Lawson Creek Road
Apt D
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



PC363
1 of 1

Phone
617-406-9265
Email
tracy@woodenlandwild.com
Address
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 sustainability. With these accolades comes the responsibility 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



PC364
1 of 1

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



PC365
1 of 1

I am writing today in support of proposals 156, 157, and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 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



Mailing Address: P.O. Box 20229, Juneau AK 99802-0229

Phone: (907) 586-2820

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 proposal¹.

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

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest
Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association



Mailing Address: P.O. Box 20229, Juneau AK 99802-0229

Phone: (907) 586-2820

E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

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

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

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 straits, 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

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

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.
SOLOMON GULCH HATCHERY

P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com



December 18, 2021

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

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,

A handwritten signature in blue ink, appearing to read 'Mike H. Wells', is written over a horizontal line.

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 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 shorttraker and roughey 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.

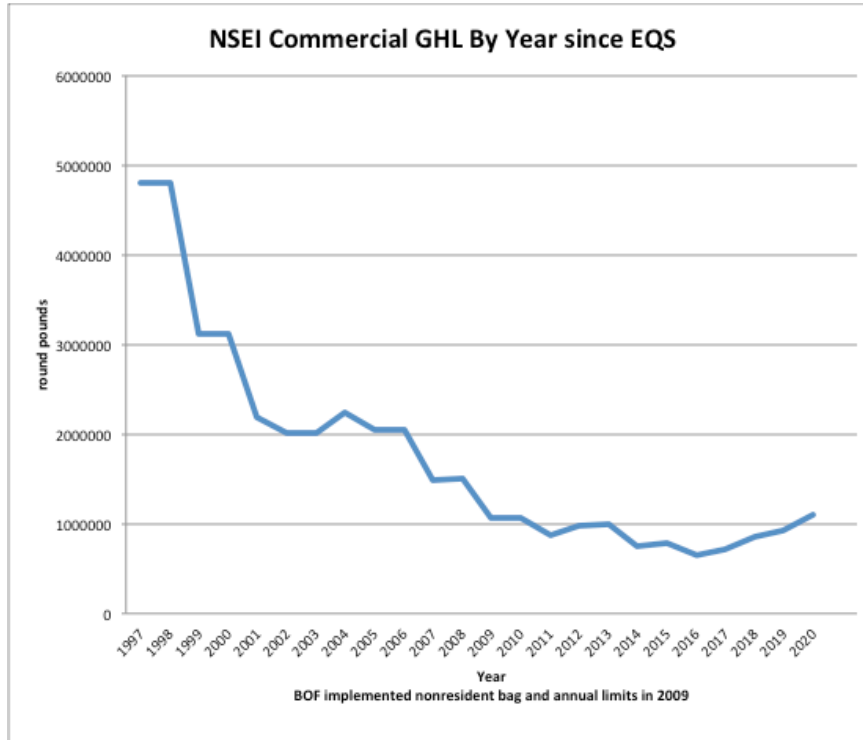


Figure 1. NSEI Commercial GHL for sablefish by year since EQS

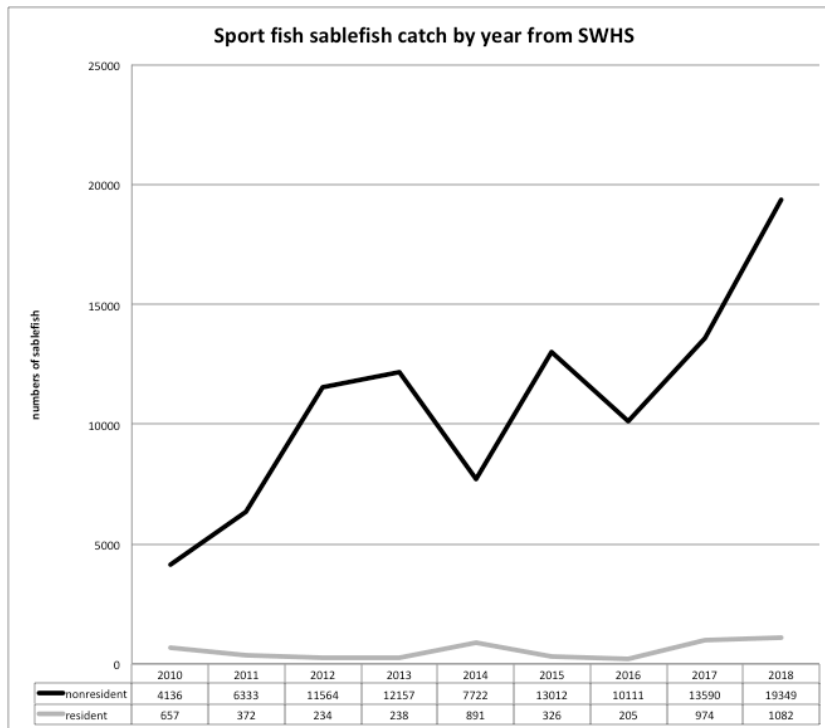


Figure 2. SE sportfish sablefish catch by year and resident status

Thank you,
Victoria Curran



Submitted By
Victoria 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 an upward trajectory and it is reasonable to put a bag and possession 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
Virginia Bottorff
Submitted On
12/17/2021 2:33:38 AM
Affiliation



PC370
1 of 1

Phone
3155555555
Email
hrhlamia_@yahoo.com
Address
821 E Brighton Ave
Syracuse, New York 13205

I am in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By
WANDA CULP
Submitted On
12/22/2021 6:11:25 PM
Affiliation
WECAN Tongass



PC371
1 of 1

Phone
19072097007
Email
wandajculp@yahoo.com
Address
8477 Thunder Mt Rd #65
Juneau, Alaska USA, Alaska 99801

My comment is in defense of the minuscule herring stock diminished historically from all S.E. waters to only Sitka waters today. Gluttonous 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
Affiliation



PC372
1 of 1

Phone
9077520246
Email
wendyalderson@gci.net
Address
714 Etolin St
Sitka, Alaska 99835

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 controlling 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 in 1992 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
Willoughby H Peterson
Submitted On
12/21/2021 8:24:33 PM
Affiliation
Tribal Citizen



PC373
1 of 1

Phone
9077381201
Email
willp33@gmail.com
Address
3511 Halibut Point Road
SITKA, Alaska 99835

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
Affiliation
FV Patience



PC374
1 of 3

Phone
315373124
Email
cyrwoody1@gmail.com
Address
1207 Edgum Drive
Sitka, Alaska 99835

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 allocation 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 management while we rebuild the stocks.

P89: Oppose. 6 lines region wide has a disproportionate benefit for top tier producers and may create a barrier 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 accurate, 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 proposer 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 production is integral to commercial 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 proposer 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 operators 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 precedent 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 losing 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 enforcement 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 participate 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 coming 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 aggressive 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 amended by Sitka AC. We need to do everything we can to limit unintended 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 accurately enough to achieve an acceptable level of impact and risk from exploitation in the commercial fishery. Any step towards leaving more herring alive in the water is a good thing.

P159-160: Opposed, see previous reason.

P161: Opposed. The current data collection method is more than adequate 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 length 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



PC375
1 of 1

Phone
907-500-8356
Email
yolanda.fulmer13@gmail.com
Address
6310 Glacier Hwy #19
Juneau, Alaska 99801

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



PC376
1 of 1

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 moratorium on all commercial harvest of herring within Southeast Alaska for five years**, subject to an independent 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 of 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 lose 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
Affiliation
Power Troll permit holder



PC377
1 of 1

Phone
907-957-2432
Email
Fishmechanic69@gmail.com
Address
P.O Box 2451
Sitka , Alaska 99835

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.