

Dear Board of Fisheries Members,

My name is Virginia Adams. I have been a commercial fisherman all my working life. I have fished in several fisheries in Kodiak, Alaska but will comment here only about the Kodiak commercial salmon fishery. I have been a west side setnet fisherman since 1980, owning and operating my families setnet site "Valley Pt" in Viekoda Bay for 44 seasons.

It is my sincere hope that you members of the Board of Fisheries will take careful and deliberate consideration of the proposals put forth by Northwest Kodiak Setnetters Assoc (NWSA), # 62,64,70 and 71. These proposals aim to curtail and even possibly alter the steady decline and maintain the sustainability of the west side set net fishery in Kodiak. Without decisive action by the Board of Fisheries we can be assured of the eradication of this historic and, to me, beautiful fishery. I have worked on the graphs, data and in-depth explanations you will receive as Board members from NWSA so I will refrain from lengthy in depth writing here regarding NWSA proposals. As previously stated, it is my hope that you will look deeply at the information offered to you relative to these important issues and subsequent determinations.

In reference to Proposals # 66,72,73 and 74 put forward by seiners and the Kodiak Seiners Assoc, I strongly oppose these proposals. At a time when set netters are fighting for the ability to survive, seiners find it time to advocate for expanding their opportunities on the North and South boundary of the Central Section where set netters and seiners fish together (Prop # 72&73). To increase opportunity in these seine only areas directly adjacent to the combined setnet seine Central Section will only undoubtedly decrease setnet opportunity. Prop #74 is even more draconian in its attempt to split the Central Section into 3 separate management areas so seiners can concentrate efforts in 1 section while other sections remain closed where set netters fish. Any 1 section being open while others are closed will also concentrate seiners in that section reducing or eliminating set net opportunity at that time due to increased seine pressure.

West side set netters are looking for increased opportunity to survive. Ideally set netters would like to see time with set nets in the water fishing while seine effort is not present. It is critical to understand that seiners have the entire Kodiak Island and parts of the Mainland to fish, over 50 Sections. West side set netters are confined to the Central Section.

It is my belief that only the members of the Board of Fisheries will be able to prevent the impending loss of the Kodiak west side set net fishery. Prioritizing the harvest of traveling salmon through the Central Section by set net and seine and deter the increasing harvest in terminal areas by seine alone, is fundamental to our survival as set netters. NWSA has put forth proposals that attempt to hopefully begin that process. Please help us to preserve this historic Kodiak fishery.

Respectfully,

Virginia Adams



#### Submitted by: Grace Allan

## Community of Residence: Kodiak, Alaska

#### **Comment:**

I am a local fisherman who has been involved in the kodiak salmon and groundfish fisheries for the last 15 years. I am working on buying my own seine boat to support myself and contribute to our local community economy. Some of these proposals make it much harder for young fishermen entering into our local industry to succeed which is detrimental to our state fishery overall.

I oppose proposal 54 and support proposal 55, the intent of proposal 55 is to give adf&g a definite rollover threshold, while proposal 54 is doing the same but trying to take jig cod quota away from the jig fishermen at the same time. Cod jigging is one of the last low cost entry fishery for small boats. We should be trying to support low cost entry fisheries as a way to encourage a diverse marine economy, not reallocating that quota to higher entry cost/larger boat pot fishery. Let's be cautious and start with the lower rollover threshold of 10% and increase it later on at future BOF if needed.

I support proposals 56 and 57. As a herring gill net permit owner we need to diversify our herring markets and seasons as much as possible since the roe fishery has become less and less profitable.

I oppose proposals 62 and 70. If setnet salmon allocations need to change let's do it in a manageable way. The mixed-stock, multispecies, non-terminal nature of the setnet fishery makes it impossible to effectively allocate to their gear type. This is why there is no allocative plan in the state that allocates harvest to setnet gear types outside of terminal harvest locations. These proposals scare me away from investing more into my seining operation if large swaths of my fishing time and possible catch can be taken away to favor a gear type that seems unable to realistically harvest what they are asking for.

I support Proposal 66, it just makes sense that we follow the rest of the state and do away with antiquated gear regulations that don't apply in the way they were originally meant anymore.

I support proposal 74, this proposal enables the state to tailor management to specific salmon runs. If the department is on board with this change I see only positive ramifications for our fish stocks.

Proposal 54: Oppose	Proposal 55: Support	Proposal 60: Support
Proposal 62: Oppose	Proposal 66: Support	
Proposal 70: Oppose	Proposal 74: Support	



Dear Board of Fish Members,

My family has been harvesting and processing salmon in Uganik Bay, Kodiak Island since 1944. My father in law worked the salmon traps, then worked a seine boat and ultimately became the cannery superintendent for many years. I ran the local setnet tender "Flying Tiger" in the early 70s. My wife worked in the cannery packing eggs and serving food in the mess hall. She has spent every summer of her life in Uganik Bay. We met there in 1969. After we graduated from college, we made the decision to buy a setnet site and raise our children in Uganik Bay. Fishing salmon and hand lining halibut from our Gull Light Setnet cabins in Uganik. When the kids graduated high school, we bought another site and permit to help put them through college.

The Kodiak Setnet fishery could be the last viable small boat fishery in the country. Over the past 10 years we have witnessed firsthand the reallocation of salmon away from set netters into the hands of the seine fleet. We're in danger of losing our way of life because of the changes in fisheries management and increases in seine boat size and gear efficiency.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Set netters Association. Set netters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Robert, Tyler, Ashley, and Christy Allen



December 26<sup>th</sup>, 2023 Matthew Alward 60082 Clarice Way Homer, AK 99603

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

#### Re: Opposition to proposals 62, 69, and 70

Dear Chairman Wood and Board of Fisheries members,

I am a commercial fisherman living in Homer, AK who has operated my own vessel in the Kodiak salmon seine fishery since 2008 with Larsen Bay as my base of operations, and I am opposed to proposals 62, 69 and 70. I raised my family on the back deck of our family boat fishing mostly on the west side of Kodiak Island which is the area that would be affected by these proposals.

Proposal 62 asks for the set gillnet (setnet) fleet to start fishing 48 hours before the seine fleet and for the seine fleet to be closed for 48 hours a week when the section is open all week to get back to a "traditional" harvest split between the seine and setnet gear groups. As noted by the Department of Fish and Game (F&G) in staff comments opposing this proposal "...this proposal would require commercial set gillnet only fishing periods, requiring more terminal fishing time in the Northwest Kodiak District as well as the Inner Karluk Section of the Southwest Kodiak District, jeopardizing local king, sockeye, pink, chum and coho salmon escapement." Proposal 62 would limit the Department's ability to control escapement and would result in forgone harvest opportunities of local stocks and force them to give the seine fleet more opportunity in inner bays and Inner and Outer Karluk when stocks are abundant. If F&G sees an abundance of fish in the Central Section under this proposal there would be a 72-hour delay (24 hour notice and 48 hour set gillnet only) to the ability of the seine fleet to harvest any of that abundance, enough time for those fish to travel through the Central Section and no longer be available for harvest.

As the data shows, there are less setnet permits fishing in the Central Section than there were in the 1990 to 2012 time frame, as well as much smaller early Karluk sockeye runs which both have contributed to this perceived shit in allocation. On top of that, in order to protect week local westside pink and chum stocks as well as the early Karluk sockeye runs there has been less fishing opportunity in the Central Section, which has resulted in more Karluk fish building up in Inner and Outer Karluk, which is a management decision for the health of the stocks but has resulted in more of the seine fleet sockeye and pink harvest coming from Outer and Inner Karluk as opposed to the Central Section.

There has also been an increase in algal slime as noted in proposal 67 from the 2020 Kodiak finfish Board of Fisheries (BOF) meeting which has at times rendered set gillnets unfishable contributing to the perceived allocation shift. The Board took action at that meeting to allow the use of monofilament web to try to counter the effects which I supported at the time. Add to that the fact that migration patterns



have shifted in the last ten years to more fish coming from the south as opposed to the traditional pattern of fish traveling from the north which means less fish swimming though the Central Section giving the setnet fleet less opportunities for harvest. When the fish are traveling from the south you could close the seine fleet completely and those fish would not necessarily be harvestable by the setnet fleet causing forgone harvest.

It has been stated that the seine fleet is more efficient now and thus fish are not getting into the Central Section. I'm fishing the same seine that I've had for 15 years, and my boat has less horsepower now than when I started in 2008 with the same hydraulic system. If the seine fleet was that much more efficient than how is it that the percentage of Alitak fish, that must travel through the seine only areas to get to the setnet areas, that are caught by setnets compared to the seine fleet has remained relatively consistent since the mid 80's? Or how come the percentage of Central Section Chum salmon caught by the setnet fleet compared to seine fleet has remained consistent in the same time frame. If the seine operations were that much more efficient now, then how are we only affecting the sockeye and pink harvests of the westside setnet fleet and not their chum harvest or the Alitak setnet fleet?

Proposal 69, which the department opposes, would require the department to have setnet only openings regardless of escapement levels in the Central Section and Karluk. This goes against sound management practices and would only contribute to a further decline in westside stocks, not helping any fleet out and for that reason alone should not be considered.

Proposal 70, which F&G also opposes, would create a westside allocation management plan. The Central, Inner, and Outer Karluk Sections are a highly mixed stock fishery with Sockeye, pink, chum, and coho stocks returning to hundreds of streams with highly variable run timings. There is no other allocative salmon management plan on mixed stocks in the state and there should not be here. If less setnet fishermen fish or the stocks are not traveling though the Central Section how could F&G manage to an allocation? Setnet effort has already declined from the years they want an allocation to match and given the state of salmon markets may decline even more. If this proposal were to pass it would force the Department to keep the seine fleet closed and if the setnet fleet couldn't harvest the fish no one would be able to harvest causing a great amount of forgone harvest going against the sustained yield principal in our state constitution.

I feel for the setnet fleet, but all fishermen are hurting. The markets for not just salmon but most Alaskan fisheries are in the worst state since the beginning of commercial fishing right now. Pasing proposals that would create a forgone harvest of salmon in order to try to give a portion of those fish to the setnet fleet while harming the seine fleet and processors is not the answer. The Central Section is where a large portion of the small boat fleet and local westside village residents fish and the passing of any of these proposals could mean the end of their fishing careers. I support anything that will help the setnet fleet, like proposals 63 and 64, or even allowing longer set gillnets for each permit, but I do not support proposals 62, 69, and 70 which would harm the seine fleet and fish stocks.

Sincerely,

Matthew Alward



Submitted by: Stosh Andersonb

Community of Residence: Kodiak

#### **Comment:**

Proposal 57: I support this proposal to increase access for the food and bait herring market. The roe market is not adaquate for the herring that is available.

Proposal 53: I oppose adding long lining pots to a fishery that is fully utilized with single line pot fishing. The stocks are suseptable to the negative impactss of warm ocean temperatures, now is not the time to add more gear to the fishery.

Proposal 53: Oppose Proposal 57: Support



#### Submitted by: John Angst

#### Community of Residence: Anchorage, Alaska

#### **Comment:**

Dear Board of Fish Members,

I have been setnetting in Kodiak since 2016. I have been a setnet permit holder, fishing in Onion Bay on Raspberry Island, since 2017. I am a life-long Alaskan, born in Juneau and currently living in Anchorage. Both commercial and sport fishing in Alaska have been a part of my life for over 40 years.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

Setnetting is a family affair for me. My wife and I, along with our two sons, ages 10 and 8, spend eight to twelve weeks in Onion Bay every summer. Being able to live remotely and spend time as a family is extremely important to us. The work ethic and lessons that my boys are learning are invaluable and not something that can be taught as effectively at home in the city.

Additionally, we rely on the income from our setnet operation. Without this income my wife and I would be looking at the possibility of having to find additional summertime work in town. This would be of detriment to our family dynamic as we would be forced to spend more time away from each other and from our children.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

John Angst

Proposal 62: Support Proposal 70: Support Proposal 74: Oppose Proposal 64: Support Proposal 71: Support Proposal 66: Oppose Proposal 72: Oppose



Submitted by: Jason Barkemeyer

Community of Residence: Kodiak

#### **Comment:**

Proposal 49 there is no evidence that restricting Kodiak chinook fishery would impact/improve the Cook Inlet return. It has been established the chinook caught in Kodiak are returning to waters outside of Alaska.

Proposal 44: Oppose	Proposal 45: Support	Proposal 46: Support	Proposal 47: Support
Proposal 48: Support	Proposal 49: Oppose	Proposal 50: Support	Proposal 51: Oppose
Proposal 52: Support	Proposal 53: Support	Proposal 54: Support	Proposal 55: Support
Proposal 56: Support	Proposal 57: Support	Proposal 58: Oppose	Proposal 59: Support
Proposal 60: Support	Proposal 61: Oppose	Proposal 62: Support	Proposal 63: Oppose
Proposal 64: Oppose	Proposal 65: Support	Proposal 66: Oppose	Proposal 67: Support
Proposal 68: Support	Proposal 69: Oppose	Proposal 70: Oppose	Proposal 71: Oppose
Proposal 72: Oppose	Proposal 73: Oppose	Proposal 74: Oppose	



#### Submitted by: Daniel Basargin

# Community of Residence: Homer, Ak

#### **Comment:**

I do not support the jig cod quota splittibg to the pot quota.

Proposal 54: Oppose Proposal 55: Support

Submitted by: Max Basargin

Community of Residence: Homer, AK

**Comment:** 

No for 54, yes for 55. Jiggers deserve to keep their quota.

Proposal 54: Oppose Proposal 55: Support





Submitted by: Miron Basargin Community of Residence: Homer Comment: Please no sticky hands into small guy's cookie jar Proposal 54: Oppose Proposal 55: Support



We are Lauri and Jeff Bassett and since 2006 have operated our family setnet operation in Uyak Bay which is part of the Central section of the Northwest Kodiak district. We hold two permits.

**We would like to withdraw support for Proposal 65, of which we are the authors.** The Kodiak Advisory Committee voted unanimously against the proposal. According to ADF&G it is not enforceable.

Of the proposals submitted by the Northwest Setnetters Association:

We are in support of Proposal 70. The Kodiak Central Section setnet fleet is struggling to remain viable. We cannot compete with the efficiency gained by the seine fleet over the last two decades. Further, poor pink salmon runs in the streams of the Northwest Kodiak District have hurt our gear group and we cannot move to other harvest areas. Finally, in recent years, the Karluk River sockeye is being harvested in the Southwest District in greater numbers. Currently, we are managed such that setnet openings and closure periods coincide with the seine fleet. A viable option is for the Central Section setnet fleet to be managed independent from the seine fleet. For this reason, Proposal 70 has our full support. Proposal 70 will provide a benchmark for ADF&G management. Most other areas in the state have instituted an allocation plan and we think Kodiak should be able to also develop an allocation plan.

#### We are in support of Proposals 62 and 71.

- We support Proposal 62. We don't think it's the complete answer but it's a tool that can be used to allocate fish to the setnet fleet. Without the defined math as put forth in Proposal 70, there is not a benchmark to determine its effectiveness.
- We support Proposal 71 because it gives ADF&G more flexibility.

Over the years, we have experienced declining catch along with environmental challenges unique to stationery fishers. All fishers have challenges unique to their gear group. Building a management plan that allows ADF&G to respond to gear groups independently allows the department to better manage allocation. Given the limited options for setnetters to enhance efficiency and increase catch volume, our gear group depends on ADF&G to effectively manage the fishery, ensuring a robust return and a prosperous harvest that translates into economic gains for all permit owners.

We are opposed to Proposals 66, 72, 73, and 74. Without an independent allocation plan, the result of these proposals increases opportunities for the seine fleet which directly decreases opportunities for the setnet fleet, which is struggling to remain viable.

Thank you for your consideration.

Sincerely,

Lauri & Jeff Bassett



Dear Board Members,

My name is Mark Beardsley, a Kodiak Westside setnet fisherman and permit holder. I have been actively participating in the Kodiak salmon setnet fishery, on the Westside of the island for over 4 decades in Uyak Bay. My wife and I currently reside in Kodiak and have lived in the State of Alaska since 1995.

I am writing in **support of Proposals 62, 63, 64, 70 and 71**, all of which provide some relief for our struggling fishery. Setnetters in the Central Section of the Kodiak Management Area have lost historic catch share from the areas we are managed by on the Westside. Setnetters are struggling in recent years to keep their businesses viable. Our ability to pay a fair wage has diminished to the point so hiring and retaining crewmembers is problematic. All of these proposals aim to reverse these trends by providing some needed help to our setnet fishery.

**Proposal 62** provides time and area opening for our gear type. Currently, all gear types fish simultaneously alongside each other during any opening in the Central Section and this is becoming more problematic for set gillnet operations. We are trying to compete with more efficient seine operations having superior communications, mobility and harvest capabilities.

**Proposal 63** provides an individual who doesn't have an available family member, spouse or child, who can be present for 3 or more months, the ability to fish 2 set gillnet permits resulting in more stability in their operation and added revenue to be spread amongst crewmembers and the local economy. Additionally, two permit operations currently on the market "for sale" will actually be desirable by a single individual if this Proposal were to pass. It would allow new entrants into the fishery where otherwise it could be financially challenging with only 1 permit as an option to an individual.

**Proposal 64** provides a gear modification to address set gillnet efficiency. Set gillnetters have increased their number of nets available in varying mesh sizes trying to keep their operations as efficient as possible. Setnetters now have a "quiver" of nets for targeting different sizes of fish and/or timing of different runs during the season attempting to gain as much harvesting capability as possible. Adding to the length of the hook may provide needed harvesting abilities while at the same time it will be sacrificing length and distance off the beach. This Proposal, if passed, will see mixed use depending on the location of the site but could provide needed help for some operations.

**Proposal 70** provides immediate and measurable relief for a struggling fishery by restoring noticeable catch share losses. Proposals 62 and 64, mentioned above are a few tools that could be utilized to try and reach an allocation goal. Terminal areas, adjacent to the Central Section, are currently available to other gear types to manage over escapement concerns.

**Proposal 71** is a simple housekeeping matter and provides the Department better flexibility. Early-run sockeye escapement to the Karluk River system is more attainable with this proposal



while providing possible opportunity for all gear types in the Central Section. Additionally, this proposal will most likely increase Chinook salmon escapement into the Karluk system.

I am **opposed to Proposals 66, 72, 73, and 74**, all of which would diminish opportunities for the gillnet fleet on the Westside, which is already struggling to survive.

Thank you for your time and consideration.

Sincerely,

Mark Beardsley



December 23, 2023

Dear Board of Fish Members,

Thank you in advance for your process to address our needs. My name is Sheila Beardsley and I am a setnet permit holder and fisher on the west side of Kodiak. I started in this industry in 1989 as a processor at Kodiak Salmon Packers, from there I moved to setnetting with my husband and we obtained another permit in this fishery to make it viable for our family. I live in Kodiak year-round

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

During most of the past 30 years, our fishing went along status quo, of course with a few bumps along the way during some seasons. Because I work on the water daily for all these years I observe the ebb and flow of what's happening. In more recent years, as the salmon remain to return thankfully to our area (Uyak Bay and Shelikof) and we chug along with our traditional ways of fishing, that is not so for the seine fleet. Their boats have gotten larger and are more equipt with technology to harvest what is affecting us and ultimately divert the salmon when the seine fleet makes a wall of nets and boats. This takes place before the salmon get a chance to move into our area, where we remain a traditional stuck gear wishing and hoping for a piece of the salmon runs. This loss of harvest not only affects our livelihood but also impacts our ability to employ crewmembers. We need the crew to help with this manual fishery and we want to continue to employ people. We enjoy sharing our way of fishing with the crew as well as enjoying the area we live in and believe to be one of the most beautiful places!

I am strongly opposed to proposals 66, 72, 73, and 74, all of which have the potential to diminish the setnet fleet opportunity, which is already failing.

Thank you for your consideration, we look forward to seeing you in January.

Sincerely,

Sheila Beardsley



#### Submitted by: Arthur Becker

#### Community of Residence: Kodiak, AK

#### **Comment:**

Hello, my name is Arthur Becker, I'm 38. I've lived in Kodiak my whole life and was introduced to seining when I was 16. I just bought a seiner that I ran in 2022 and 23. The current economic turmoil/prices are not making it easy to keep my small business afloat. Naturally I'm opposed to any proposals that would limit my fishing time, restrict options to areas/opportunity or don't make sense scientifically.

Proposal 60: Support Proposal 67: Oppose Proposal 72: Support Proposal 62: Oppose Proposal 68: Oppose Proposal 73: Support Proposal 65: Oppose Proposal 69: Oppose Proposal 66: Support Proposal 70: Oppose



#### Submitted by: Lacey Berns

#### Community of Residence: Mckinleyville CA 95519

#### **Comment:**

I am commenting on Proposal 63 which I submitted. Attached are comments and excerpts from CFEC Report No.13-4-N Kodiak Salmon Set Gillnet Permit Stacking (2013) to the Board of Fisheries

Proposal 62: Support With AmendmentsProposal 64: Support With AmendmentsProposal 67: SupportProposal 68: SupportProposal 70: SupportProposal 72: OpposeProposal 74: Oppose

Proposal 63: Support With Amendments Proposal 65: Support Proposal 66: Oppose Proposal 69: Support With Amendments Proposal 73: Oppose



Lacey J Berns Comments on Proposal 63 To Allow Permit Stacking in the S04K fishery Submitted by myself. 12/26/23

Also attached " CFEC Report No. 13-4-N "The Kodiak Salmon Set Gillnet Permit Stacking (2013) presented to the Board of Fisheries.

Board of Fisheries members:

Thanks for your interest in proposal 63.

#### Background

I started setnetting in Kodiak in 1977. I've fished at 9 different sites and also raised my 4 children between Uganik and Viekoda Bay, In the Central Section. We also owned 4 different seiners during this time.

Over the span of 4 decades, our salmon fishery has completely changed and is now in crisis. What was once a fishery that supported us and sent our kids and crew to college, is now completely devastated by low prices, lack of opportunity (ADFG closures) and the expense of gear, skiffs, and outboards. Added to that, we've lost access to experienced, enthusiastic crew because most of them have migrated to Bristol Bay--more lucrative than a 3 month Kodiak season. My kids can't make any money fishing with me. I've started paying about 50% to the crew so that I can operate.

Many of us felt that this season was the most stressful season we'd ever experienced. Prices collapsed. Canneries ran out of cans during the best late red season in 9 years, ADFG closed us for 2 weeks the 3rd week of July. The average of the setnet fleet was \$22,000.

The stark reality now is that many of us may not survive this collapse.

#### Proposal 63: Gillnet Specs and Operations-Why?

At the least, this proposal would eliminate some of the stress of emergency transfers and allow us to continue to fish the gear, 2 permits (purchased the 2nd in 2003) and site-the result of financial investment for nearly 4 decades.

#### The myth of consolidation no longer applies to S04K.

"Stacking" should not be a terrifying word any longer. I submitted the proposal to allow 2 permits in one name, because at the very least, it may help us to continue to fish. (Consolidation might be a threat under a robust and thriving fishery.)

# CFEC stringent enforcement: It's become difficult to transfer within the family

We bought our second setnet permit in 2003 and have always had it in one of the kids' names because eventually they've grown up to run the skiff. We have always had a relatively easy time transferring permits within the family until 2020 when CFEC cracked down and became extremely conservative.



# Economics & reality on the grounds

We only have 2 viable "sets" we'll never buy another permit again.

There is no economic incentive to purchase additional permits, and gear (new outboards are \$13,000, a net is \$3500, groceries \$3000, etc) if we can't afford to fish as it is.

Looking at the average income of \$44,000 over the past 20 years, permits and sites have no buyers. In reality, most setnetters don't have the "room" to put an additional permit.

In Viekoda, most of us are over 65 and the transferee "pool" of kids/crew has exited setnet fishery. Some of our spouses can no longer participate due to illness or disability.

We used to think that selling our sites would provide a decent retirement fund. Not so any longer.

# Kodiak is wide open for young fishermen:

It's never been a better time for young people to get into the setnet fishery.

As far as excluding young entrants in the Kodiak setnet fishery, that's no longer the case. For example, a 2 permit site that had been purchased for over \$750,000 in 1997 was sold last year for \$200,000 including private land, state of the art aluminum skiffs, gear, cabins, to 2 young women in their twenties!

Many of my friends have listed theirs, without any interest.

In conclusion, I think this would be such a helpful proposal for many of us, especially because we're aging. A tremendous amount of attention has been paid to young fishermen in Alaska as opposed to the "forgotten" veterans of this amazing livelihood, that few of us want to leave.

Thank you very much for your time and consideration, Lacey J Berns

The following excerpts are submitted to provide insight for the S04K situation.

# <u>CFEC Report No. 13-4-N The Kodiak Salmon Set Gillnet Permit Stacking (2013) presented to the Board of Fisheries</u>

- Kodiak implemented stacking from 2008-2010 and it was allowed to "sunset". It covers the fishery until 2012. Despite being 12 years in the past, there are several factual statistics noted.
- "The residency of persons who fished with stacked permits does not appear to be substantially different from the proportion of resident types in historical or current single permit operations." (p.3)
- "Between 2008-2010 the Relationship of Transferors to Transfer Recipients by Year (table) shows that 87-89% were between "friend, partner, immediate family, or other relative." (p.5)
- Contrary to concerns that stacking would encourage greater numbers of Emergency Transfers, Table 5 shows that between 1975-2012, the average % of ETs was 7.7%. Between 2008-2010 the rate was 7.6%. (p6)



- Table 8. "New Entrants in the Kodiak Salmon Set Gillnet Fishery"
  Contrary to the concern that stacking would stymie new entrants in the Kodiak fishery under the assumption that permit prices would increase, this table shows that between 1990-2012 an average number of new entrants was at 9%, exactly the same between 2008-2010.
- Age of Permit Holders

Table 9. Median age of Select CFEC Permit holders, between 1975-2012. The age of Kodiak Salmon Setnet permit holders has increased from age 39.9 to 53.5 over 37 years. If that rate holds true for the past 12 years, you might expect the average age to be in the low 60s. I am 69. I'll be 70 in a month



Submitted by: Richard Blanc

#### Community of Residence: MOUNT VERNON, WA

**Comment:** 

Board of Fish:

Proposal 63

5 AAC 18.331. Gillnet Specifications and Operations

Allow permit stacking in the set gill net salmon fishery

I Richard Blanc, Kodiak set gill net fisherman for 52 years urge you to put proposal 63 into regulation.

My wife and I have four S04K permits that we fished as a family for years. The kids are grown and have vocations of their own, which don't allow them to fish. In order to make a living we need the harvest of 4 permits. Under current regulations in order to fish all our permits we need to permanently transfer 2 of our permits to crewmen. When they are no longer crewmen there is no guarantee that we will get the permits permanently transferred back to us.

I was the author of the 2008 dual permit regulation that was sun set for 3 years and not put into regulation permanently by the following BOF.

During those 3 years there were 38 dual permit fishers, the majority were Alaskan residents living in Kodiak.

There was no absentee ownership and no consolidation of the fleet as those in opposition feared.

By passing regulation 63 into regulation, family operations will have a better chance of survival. Permits will be stabilized and a mountain of paperwork will be eliminated by the CFEC. It will help Alaskan residents.

Thank you for your consideration of this matter,

**Richard Blanc** 

Proposal 64: Support



#### Submitted by: Jason Blondin

#### Community of Residence: kodiak

#### **Comment:**

My name is Jason Blondin as the author of Proposal 54 I believe there needs to be a set percentage of 25% for March 25th, to trigger an opener for pot fisherman on April 1. Allowing pot fisherman to harvest half the remaining jig sector TAC as of March 25th. I am proposing 25%, because looking at all the information that I was provided by the department it shows that jig fisherman on average harvest 13.7% by March 25th. The average TAC caught on the years the jig sector harvested 90% or more of their TAC, they averaged 25.4%. I am trying to make sure all the TAC is harvested from both gear types without having to propose a new adjusted allocation. Giving jig fisherman the same opportunity to catch their TAC, but have a way to reallocate mid season if it appears they will not meet the TAC. Going back to 1997 when the state water fishery started the jig sector they only harvested the TAC 10 times leaving a significant amount uncaught and rolling over to pot fisherman late in the year. After the federal B season TAC was reached when most local processors were not buying until the new year for the A season.

Proposal 55 wants to set the percentage at 12.3%, which is the 10 year average caught by March 25th. I believe this number will not work, because out of those 10 years they only harvested the full TAC twice. The numbers will show going with a 10 year average that will not insure that TAC to be achieved on most years, leaving us with the same problem we are currently in with no resolution. With that said I would like board to consider Proposal 54 so we can meet the TAC in both gear types leaving no quota uncaught every year.

Proposal 54: Support	Proposal 55: Oppose	Proposal 62: Oppose	Proposal 65: Oppose
Proposal 66: Support	Proposal 67: Oppose	Proposal 68: Oppose	Proposal 70: Oppose
Proposal 72: Support	Proposal 73: Support		



#### Submitted by: Curtis Bollinger

#### Community of Residence: Kodiak, AK

#### **Comment:**

As a second generation Kodiak small-boat seiner, I support all of the Kodiak Seiners Association's positions on these proposals. I am heavily invested in this fishery and my family's livelihood depends on it. Even without the current downturn in salmon markets, some these proposals, especially 62 and 70, would be detrimental to my ability to support my family and maintain my fishing operation.

I oppose proposals 62 and 70 because they would greatly affect my livelihood as a small boat fisherman, as I spend a large portion of my season fishing in the central section, due to it's fishability during bad weather, and my ability to fish multiple locations with minimal travel time and fuel consumption.

I support proposal 66 because it would simplify net building and repairs as well as lower cost. This proposal would not affect harvest volume.

I'm opposed to proposal 67 because it would limit the ability of the fleet to spread out during the late season.

I'm also opposed to proposal 68 because it would limit the ability of the fleet to harvest late-season pinks and reds. Also, these closure dates are too early in the coho run to worry about their escapement, since they run much later in the season. We already have escapement goals, anyways.

I also support proposals 72 and 73 for the reasons given by the Kodiak Seiners Association.

- Proposal 60: Support Proposal 67: Oppose Proposal 73: Support
- Proposal 62: Oppose Proposal 68: Oppose

Proposal 65: Oppose Proposal 70: Oppose Proposal 66: Support Proposal 72: Support



Submitted by: Nina Burkholder

#### Community of Residence: Homer, AK

#### **Comment:**

Subject: SUPPORT for Proposal 63 - Stacking of Limited Entry Permits in Kodiak Salmon Set net Fishery

Dear Chairman Wood and Board members:

I am writing to express my strong support for Proposal 63, which advocates for the stacking of limited entry permits in the Kodiak salmon set net fishery. I believe that allowing one person to hold and operate two permits will significantly contribute to the financial stability of fishing operations in the region and foster the creation of more job opportunities within the industry.

In our ever-changing economic landscape, the fishing industry faces numerous challenges, and Proposal 63 presents a practical solution to enhance financial sustainability. By permitting the stacking of limited entry permits, individual fishing operations can achieve greater efficiency and scale, which is crucial for navigating the complexities of the market and maintaining a robust presence in the industry.

Furthermore, the proposed measure aligns with the goal of promoting job growth within the fishing sector. Providing the means for operators to expand their fishing activities can, and will, lead to increased employment opportunities. This not only benefits individuals directly involved in fishing operations but also has positive ripple effects throughout the local economy.

I appreciate the Board's dedication to ensuring the prosperity of Alaska's fisheries, and I believe that embracing Proposal 63 will contribute significantly to achieving this objective. I urge the Board to carefully consider the potential positive impact this proposal could have on the financial well-being of fishing operations and the overall growth of the industry. Thank you for your time and consideration of my views on this matter.

Sincerely,

Nina Burkholder

Homer, Alaska

Proposal 63: Support



#### Submitted by: Emily Capjohn

#### Community of Residence: Kodiak, Alaska

#### **Comment:**

I am a Kodiak salmon permit holder. I oppose proposal 63 and all permit stacking proposals.

Sincerely

Emily Jean Capjohn

Old Harbor and Kodiak, Alaska

Proposal 63: Oppose



#### Submitted by: Roni Carmon

## Community of Residence: Kodiak

#### **Comment:**

Hb 79 failed two years ago.

In The. Senate Finance committee.

I would like you all to read house bill 79 and Congress do it this time.

All guides comma must have a commercial fishing license.

Not a business license but a commercial fishing license.

Read how spell seventy nine. A d f and g will not board a Guided boat.

If guided fishermen had a permit a license, Then they would be regulated by a fine.

But most importantly, a 1760.00 license.

X the 6.4 million guides that Frequent, alaska is a huge income.

Currently they fish our fish resourse for free.



Submitted by: Robert Carter

#### Community of Residence: kodiak

#### **Comment:**

My name is Robert Carter.

I'm the owner operator of FV Faith.

I jig cod out of Kodiak and am opposed to proposal #54 and in favor of proposal #55

The rollover system has only been in place for 3 years and so far is working as intended.

ADFG, In addition to considering factors such as weather conditions, the number of participants and past data illustrating jig harvest picks up in April after the pot sector closes, the ADFG has been using the latest 10 year average of 10.2% caught by March 25th to decide whether or not to rollover.

2021 the quota did not roll over and jiggers caught over 93%

2022 the quota rolled over giving pot boats access.

2023 the quota DID NOT roll over, and the jig fleet caught the quota. However the pot boats were counting on a rollover, with many leaving their pots onboard anticipating a rollover.

Their reaction is proposal 54, raising the bar to make it more difficult for the Jig fleet to prevent a rollover.

Had proposal 54 been in place in 2023, the quota would have rolled over and jiggers would be out of a job.

In fact, had proposal 54 been in place, only 3 out of the last 20 years would NOT have rolled over to the pot fleet, despite the jig fleet effectively catching the quota 9 out of the last 20 years.

I've heard a lot of talk of "compromise", "meeting in the middle".

This is nothing short of an attempted fish grab and any "compromise" over the 10 year average of 10.2% is the jig fleet just giving our livelihoods away!!

I implore the BOF member to look at the science that ADFG has been using to make the determinations and not just pick an arbitrary number in between the two proposals #54 (25%) and #55 (10.2%)

The Kodiak Advisory Committee understood this and voted to amended proposal #54 from 25% to 10.2%

I ask that the BOF either:

A: Do nothing.

The cod rollover is new, so far is working as intended.

Doing nothing and tabling 54-55 allows 3 more years to fine tune the science before settling on a unchangeable percent written in stone. It allows ADFG to take in other factors like weather and fleet participation when determining rollover and allows ADFG to update the 10 year average % on a yearly basis.

B: Go with proposal 55 and the 10 year average of 10.2%

This number is the most recent 10 year average, whereas proposal 54 uses an average based only on years quota was caught and goes back to days with there were hundreds of boats in jig fleet and the canneries even tendered the jig fleet.

It's unrealistic to expect the jig fleet to catch that percent when the jig fleet is a 3rd it's size from those days.

The jig fleet is compromising yet again with locking in a percentage as the area managers will not be factoring additional considerations to inform the rollover decision. The jig fleet recognizes the position this puts area managers in and is responding to the concerns with the compromises found in proposal 55.

Again i implore the BOF to not "meet in the middle" with some arbitrary number. It sets a bad precedent as anyone could challenge our quota, set a high % number and hope we'll meet in the middle. We shouldn't have to compromise our livelihood away when the rollover WAS the compromise, and is working as intended.

Thank you for your time and consideration.

Robert Carter FV Faith

Proposal 54: Oppose Proposal 55: Support



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

RE: Proposals 62 and 70, and proposal 66

Dear Chairman Wood and Board of Fish members:

My name is JD Christiansen, and I am a seiner from Old Harbor, Alaska. I am writing today to express my strong **opposition to proposal 62 and 70** from the Northwest Setnet Association, and **support proposal 66** from the Kodiak Association.

I have been operating my own seiner in Kodiak since 2012 when I bought a 38-foot Ledford. I have since upgraded to a 45-foot Hoquiam that I bought in 2020. I have watched the seiners in my community slowly diminish from 30 boats when I was a kid, down to 6 boats actively fishing in the salmon fishery. Fishing has always been the main economic driver of our community and I see proposals **62 and 70** as a danger to the remaining participants from our community.

If these proposals were to be passed, the seine fleet stands to lose a large portion of our season in days. Our fishery only works because of the longevity of the season and the access to multiple species to harvest. I urge you to consider the implications these proposals would have on the economies of the smaller communities around Kodiak, as lost revenue for individuals like me only further strengthen the burden of living in high cost areas.

I support proposal 66 which would allow me to get rid of the 7" lead web component of my net and replace it with 3.5" normal seine web. The cost savings alone are my main focus, as I can get traditional seine web at a fraction of the cost of new lead web. As the only area in the state with lead web requirements remaining, I think it is high time the Board consider changing this.

I ask that the Board be careful in taking action on these proposals as we are in a precarious time in the fishing industry with prices well below average, and processing companies in volatile markets. We cannot afford to lose anymore.

Sincerely,

JD Christiansen



Cordova District Fishermen United PO Box 939 | 509 First Street | Cordova, AK 99574 phone. (907) 424 3447 | fax. (907) 424 3430 web. www.cdfu.org



John Wood, Chair <u>john.wood@alaska.gov</u> Alaska Board of Fisheries Alaska Department of Fish and Game PO Box 115526 Juneau, AK 99811

November 9, 2023

**Re: Kodiak Proposals** 

Dear Chair Wood and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. Since 1935, CDFU has represented fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region.

As you deliberate, we respectfully ask you to consider our comments:

# Proposal 59 - OPPOSE

We oppose this proposal to amend Statewide Hatchery Basic Management Plans to reduce hatchery production to 25% of the year 2000.

Hatchery Regional Planning Teams members include representatives from Alaska Department of Fish and Game and hold strong backgrounds in the science behind hatchery production, as well as a thorough understanding of local ecologies and regional fisheries. Their open public meetings include scientific reports and presentations based on the most current research available. We support this public framework and would like to see recommendations related to hatchery management to be made through RPTs who have vetted the matters.



Cordova District Fishermen United PO Box 939 | 509 First Street | Cordova, AK 99574 phone. (907) 424 3447 | fax. (907) 424 3430 web. www.cdfu.org



Thank you for your time and consideration of our comments. We greatly appreciate the attention to the issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our comments, please don't hesitate to contact me.

Sincerely,

)esskude\_

Jess Rude Executive Director



**Cordova District Fishermen United** PO Box 939 | 509 First Street | Cordova, AK 99574 phone. (907) 424 3447 | fax. (907) 42 web.www



PC2

John Wood, Chair john.wood@alaska.gov Alaska Board of Fisheries Alaska Department of Fish and Game PO Box 115526 Juneau, AK 99811

November 9, 2023

Dear Chair Wood and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) requests that you do not pass a board-generated proposal delegating the Alaska Department of Fish and Game (ADF&G) the authority to close state waters to commercial fishing with specific gear types for the purpose of rockfish conservation. ADF&G passed an emergency petition to gain temporary emergency order (EO) authority and has used that new power to close areas or Prince William Sound (PWS) to commercial longline fisheries for now. This emergency petition can be extended or renewed; any discussion on making these regulatory changes permanent belongs in a normal, scheduled board cycle meeting.

A proposal to permanently grant EO authority to ADF&G for groundfish simply does not meet the Criteria for Development of Board-Generated Proposals as printed in the Commonly Used Regulations and Policies of the BOF<sup>1</sup> for the following reasons:

- 1. It is deeply controversial whether this is in the public's best interest. We would first like to have an opportunity to actually work with ADF&G to find practicable ways to protect rockfish in PWS.
- 2. There is no urgency in considering the issue, as the emergency powers granted to ADF&G can be extended, or another emergency petition considered.

Alaska Joint Boards of Fisheries and Game: Criteria for Development of Board-Generated Proposal, from: http://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2018-2019/common\_used\_policies.pdf

<sup>1.</sup> Is it in the public's best interest (e.g., access to resource, consistent intent, public process)?

<sup>2.</sup> Is there urgency in considering the issue (e.g., potential for fish and wildlife objectives not being met or sustainability in question)?

<sup>3.</sup> Are current processes insufficient to bring the subject to the board's attention (e.g., reconsideration policy, normal cycle proposal submittal, ACRs, petitions)?

<sup>4.</sup> Will there be reasonable and adequate opportunity for public comment (e.g., how far do affected users have to travel to participate, amount of time for affected users to respond)



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- The current process of normal board cycle proposal submittal is better suited for discussion of this item.
- 4. Having this discussion at the Kodiak BOF meeting on January 9th would not create reasonable and adequate opportunity for public comment. Traveling to Kodiak in the middle of winter is difficult for everyone, and the holidays are a challenging time for stakeholder groups to prepare comments and organize testimony. Furthermore, putting a proposal as controversial as this into the Kodiak meeting would diminish opportunity for public comment on the issues of vital importance to Kodiak.

CDFU represents commercial longliners in PWS and is willing and ready to work with ADF&G to find the best way forward to protect rockfish in PWS. There are many ways that CDFU could collaborate with ADF&G to help protect rockfish. We are disheartened that ADF&G never contacted us to communicate their concern for rockfish before making their emergency petition. The petition, which came after longline fishing in PWS effectively was over, claimed that "seeking the assistance of participants in the halibut longline commercial fishery to set gear away from aggregates of rockfish habitat has proven ineffective".

Unfortunately, we have yet to find a PWS longline fisherman who was contacted by ADF&G about this issue. We are struggling to find the advisory announcements regarding PWS rockfish conservation that were cited in the emergency petition. We want a real opportunity to work with ADF&G on protecting rockfish in PWS before permanent regulatory changes are made and areas are closed to fishing.

The regulatory changes that ADF&G requested in the emergency petition are immensely controversial, and may have far reaching impacts on the commercial fishing sector and commercial fishing dependent communities throughout Alaska. The current closures in PWS, if extended into next summer and beyond, will have a devastating effect on the small boat longline fleet operating out of Cordova. Many of our members longline from their "bowpicker" vessels which once loaded down with longline gear cannot safely fish outside of PWS. By excluding those vessels from areas of PWS, these longline closures will also effectively be reallocating PWS halibut from the commercial to the sport sector.

Stakeholders and the public deserve ample time to respond to controversial proposals that are as potentially allocative and impactful as this is. A board-generated proposal passed at this point would be brought to the Kodiak meeting in January, which is an inappropriate time and place for this discussion. It is expensive and time consuming for our members to travel to Kodiak in the middle of



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winter. The regular, in-cycle PWS BOF meeting scheduled for December 2024 is the right place for such a proposal to be debated. Before permanent regulatory changes are made, we would like to have the opportunity to work directly with ADF&G to identify rockfish habitat of concern and direct fishermen away from it. Similar work has successfully been done in Southeast Alaska by Alaska Longline Fishermen's Association (ALFA).

For all of these reasons, CDFU is urging all BOF members to vote against any board-generated proposals delegating EO authority to ADF&G for the purpose of rockfish conservation. We are ready to work directly with ADF&G and members of the Board of Fisheries to find the best ways forward to protect rockfish.

Sincerely,

)essfude\_

Jess Rude Executive Director

cc: Märit Carlson-Van Dort <u>marit.carlson-vandort@alaska.gov</u> Gerad Godfrey <u>g.godfrey@alaska.gov</u> Mike Wood <u>mike.wood@alaska.gov</u> Tom Carpenter <u>tom.carpenter@alaska.gov</u> Stan Zuray <u>stan.zuray@alaska.gov</u> Greg Svendsen <u>greg.svendsen@alaska.gov</u>



#### Submitted by: Glenn Crocetti

#### Community of Residence: Kodiak, AK

#### **Comment:**

To whom it may concern:

My name is Glen Crocetti. I am the owner/operator of the F/V Alpha Centauri and a Kodiak seine permit holder and fisherman. I am writing in opposition to proposals 62 and 70.

-I do not support 48-hour only setnet fishing periods in the central section.

-Given the current state of the salmon fishery and the current state of the market, domestic and worldwide, I do not believe any extra prohibitions on seine fishing would be healthy for the Kodiak fleet.

-maintaining a professional crew for such a long season is one of the many challenges of seine fishing in Kodiak throughout the summer. One thing that tends to build cohesiveness is to keep the crew working. Standing down for an additional 48 hours each week would be far less than ideal.

-2024 will be my 6th year seining. As a new captain, I found most of the sets that would be impacted by the proposal are the places that I could learn to fish, train a crew, and stay in seas that my 38-foot boat could manage. The areas in question were key to building my experience and gave me a strong start in the fishery. Further restrictions in this area would make it more difficult for those just starting out. The central section is pretty much where I fish for 90-100% of my season.

I am also opposed to proposal 68. This would crash the Karluk sockeye run and harm everyone.

Proposal 53: Support	Proposal 54: Oppose	Proposal 66: Support	Proposal 68: Oppose
Proposal 70: Oppose			

#### Submitted by: Glenn Crocetti

#### Community of Residence: Kodiak. AK

#### **Comment:**

To Whom it may concern,

I'm writing this to inform the Board of my strong opposition of proposal 54. My name is Glenn Crocetti. I'm the owner operator of the F/V Alpha Centauri. I have been involved in the Jig fishery since 2008 and I have been a permit holder since 2013.

Given the current state of all fisheries in general, and the state of world markets/fish prices, The jig fleet, I believe could only suffer from a lack of fishing opportunity. I believe the Jig Sector to be under enough pressure for its participants to catch there allotment of the GHL with the current numbers adopted by ADF&G. On a year like 2024, with a relatively small quota, the catch in question will mean the survival of some boats.



#### Submitted by: Peter Danelski

#### Community of Residence: Kodiak, AK

#### **Comment:**

Dear Board of Fish Members,

I am a lifelong Kodiak Setnetter and Kodiak resident. I have held a permit since 1987 and my family runs a multi-permit site in Uyak Bay that's been in operation since 1972.

Proposals 62, 64, 70, and 71 were submitted by the Northwest Kodiak Setnetters. I'm not sure how to best address the declining viability of the kodiak set net fishery, but as it's currently run, I don't even get the hours that are allotted every opening. Fishing multiple permits means the gear takes a while to set and I miss time on the front end of an opening. When the season closes, I have to start pulling nets early to make sure all the nets are out of the water by the closing time. I will never get the full hours of any opening, and sometimes, I might miss out on the last 10 hours. Right now I fish in a considerably smaller area than the Kodiak seine fleet, for fewer hours every opening. Extra time would be a step toward equity, and make it easier to stay in business.

Proposal 63 allows permit stacking of Kodiak set net permits. This is a fishery where the average income from one permit probably won't pay expenses, and there is time to fish multiple permits from one skiff. Fishing more than one permit from a skiff is more efficient and makes sense to increase profitability. In fact, that is what we, and many families have been doing for years. The problem is, sometimes family members need to leave the site and we can't fish at full strength. Stacking permits would make staying profitable more likely, and I support proposal 63.

Thank you for your consideration.

Sincerely,

Peter S. Danelski

Proposal 62: Support Proposal 70: Support Proposal 74: Oppose Proposal 63: Support Proposal 71: Support Proposal 64: Support Proposal 72: Oppose Proposal 66: Oppose Proposal 73: Oppose



#### Submitted by: Miles Dennis

#### Community of Residence: Anchorage, AK

#### **Comment:**

I am writing in support of proposals 62, 64, 70, and 71. I believe that these actions will help stop the rapid decline in harvest percentage in relation to the seine fleet. I have fished at setnet camps for all of my adult life, and have seen one die already in Cook Inlet. Having participated in Kodiak setneting, I have seen firsthand that the economic, social, and cultural value of the fishery is immeasurable. If we are not careful we risk loosing this important fishery, not because of a lack of fish, but because of an allocative imbalance. I urge the board to consider adopting these proposals. Thank you.

Proposal 62: Support	Proposal 64: Support	Proposal 66: Oppose	Proposal 70: Support
Proposal 71: Support	Proposal 72: Oppose	Proposal 74: Oppose	



**PC28** 

#### Submitted by: Henry Dera

#### Community of Residence: Kasilof, AK

#### **Comment:**

Proposal 62 and 70- I am in opposition to proposals 62 and 70.

Many factors are or could be contributing to the decline in set net harvest percentages. Environmental factors such as algae blooms, warming water, changing migration patterns, changing run timing, smaller fish size, and mammal predation are all issues cited by set net fisherman. Changes in set net operations such as reduced effort and consolidation of set net permits in multi permit "family" operations that share resources to improve bottom lines also has a negative effect on the overall per permit harvest percentages.

After the collapse of the salmon market this past season, many fishing operations both seine and set net alike are operating marginally at best. Allocating fishing time to set nets permits unfairly places the blame and financial burden for declining harvest percentages on the seine gear type. A large percentage of my harvest is caught in the central section of the NW Kodiak district and the loss of fishing time in my most productive area at a time of historically low salmon prices, high inflation, and market uncertainty has a high potential to cost myself and others our livelihoods.

Proposal 62: Oppose	Proposal 63: Oppose	Proposal 64: Oppose	Proposal 65: Oppose
Proposal 66: Support	Proposal 67: Oppose	Proposal 68: Oppose	Proposal 70: Oppose



Submitted by: Jennifer Dera

#### Community of Residence: Kasilof, AK

#### **Comment:**

To Whom is May Concern:

Thank you for the opportunity to comment.

Proposals 62 and 70 do not address the real issues behind the declining harvests for west side fishermen. It would be more beneficial for setnet fishermen to extend their fishing days and areas to maximize their harvest percentages.

Additionally, as a family deeply rooted in commercial salmon seining, I am extremely concerned about the negative implications of these proposals. They could be extremely harmful to not only our operations but our livelihood, as well as other the livelihoods of other fishermen and Kodiak Island's fishery-dependent economy.

Sincerely,

Jennifer Dera

Proposal 62: Oppose Proposal 68: Oppose Proposal 63: Oppose Proposal 70: Oppose Proposal 66: Support Proposal 73: Support Proposal 67: Oppose





Douglas Island Pink and Chum, Inc. 2697 Channel Drive • Juneau, Alaska 99801 (907) 463-5114 • www.dipac.net

December 21, 2023

Alaska Dept. of Fish and Game Alaska Board of Fisheries P.O. Box 115526 1255 W. 8<sup>th</sup> Street Juneau, AK 99811-5526 Submitted online form 12/21/2023

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** wants to express gratitude for the removal of proposal 59 from the Kodiak meeting.

If this proposal were to be accepted as written, it would lead to significant negative impacts on fishing opportunity for all user groups, communities, and stakeholders where hatchery raised salmon are harvested. Hearing a statewide hatchery proposal in Kodiak makes it very difficult for stakeholders from Southeast Alaska to be able to participate in the meeting.

DIPAC cares greatly about the affects their programs have on users of the resource, the near shore and marine environment, and wild salmon. We are continually striving for knowledge of how to better our programs for the human users and for the greater near-shore and marine ecosystem.

Respectfully,

Hart Hamo

Katie Harms Executive Director - DIPAC



#### Submitted by: Don Dumm

#### Community of Residence: Kodiak

#### **Comment:**

Dear Members of the Board of Fisheries,

There has been a decline in the setnet share of overall catch in the NW district over the last 20 years. This amounts to a gradual reallocation of the resource. The Northwest Setnet Association, (NWSA) has written 4 proposals, 62, 64, 70 and 71 in an attempt to stop and hopefully reverse that decline. I am writing in support of those proposals, realizing that they may, if enacted, result in a reallocation of the resource. Again, our point is that the reallocation has already occurred over the previous 20 years and these proposals only seek to bring the setnet catch share back to pre 2000 levels.

I oppose proposal 74 which would splinter the existing Central Section of the Northwest Kodiak District into 3 smaller sections. This would result in eliminating opportunity for setnet fishers in sections that may close and increase competition with the seine fleet in the open section(s). The result would be a further reduction in setnet catch share. The Department already has the tools it needs to manage the fishery by regulating fishing time in the inner bay sections.

I oppose proposals 72 and 73, which would increase catches of fish migrating through SW Afognak Section (72) and Sturgeon River Section (73). While increasing opportunity for the seine fleet, these proposals would result in less opportunity for setnet fishers in the Central Section.

I also strongly oppose proposal 63 allowing a permit holder to fish two permits (stacking). This is consolidation that would benefit fewer participants at the expense of opportunity for future entrants to the fishery. It does absolutely nothing to remedy the diminishing catch share that NWSA is trying to address. It does split that diminishing catch into fewer pieces, a temporary and I believe short sighted attempt at financial gain. My wife and I have opposed stacking since its inception. It runs counter to the intent written in the Alaska State Constitution to maximize the benefit and use of our resources for all citizens of our state.

Sincerely,

Don Dumm

PO Box 1723

Kodiak, AK 99615

Proposal 62: Support Proposal 67: Support Proposal 71: Support Proposal 63: Oppose Proposal 68: Support Proposal 72: Oppose Proposal 64: Support Proposal 69: Support Proposal 73: Oppose Proposal 66: Oppose Proposal 70: Support Proposal 74: Oppose



**PC32** 

#### Submitted by: Daniel Earle

#### Community of Residence: Baltimore, MD.

#### **Comment:**

Proposal 63

As the fleet ages and setnet harvests decline, this proposal would enable aging permit holders with long-term or permanent medical conditions that impact their ability to actively participate in the fishery, to bypass C.F.E.C.'s restrictive 2 year maximum medical transfer regulation. Such a change would have no negative impact on fleet harvest figures, and would enable individual setnet operations to maintain their historic average catches. We fully endorse this proposal.

#### Proposal 64

The 25 fathom hook was likely established as a reaction to the large harvests of cannery-owned fish traps before Statehood. Stationary setnets were likened to traps and have been limited to innovation by this comparison. Now, with the steady decline in setnet harvest figures and therefore profits, our fishery requires some innovation in order to remain viable. We fully endorse this proposal.

Daniel Earle

SO4K59415P

Sandra Earle

SO4K61139R



Dear Board of Fish Members,

My name is Gabriel Edwards, a commercial set-net fisherman and permit holder on Kodiak Island. I was born in Kodiak and have lived there for most of my life. I come from a family of commercial fishermen and have fished out of Viekoda Bay, on the west side of Kodiak Island, for many years.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

The set-net fishery is a gear type of historic importance on Kodiak Island. Traditionally, the salmon resource was allocated in such a way that the different gear types at least had a fair shot at intercepting these fish. We would like that situation to continue, and as such I am writing in support of these proposals.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

**Gabriel Edwards** 



**PC34** 

Submitted by: Jonathan Edwards

# Community of Residence: Chiniak, Alaska

#### **Comment:**

Dear BOF,

I am a Kodiak Island setnet permit holder, and have been set netting on Uganik Island for 43 years. Uganik Island Is on the west side of Kodiak Island. I have lived in Alaska for the last 44 years. I am totally opposed to splitting up the Central section of the Kodiak Salmon Management Area. The Central Section is one of only 2 areas where set netting is allowed in the Kodiak Island Management Area. To split this area up would be devastating for the Westside Kodiak Island set netters.

Thanks for your consideration in this matter,

Jonathan Edwards

Dear BOF,

I am a Kodiak Island set netter and have been set netting on the Westside of Kodiak Island for the last 43 years. I am opposed to proposals 72 and 73. I feel this would adversely affect Westside set netters and would allocate fish to the Kodiak Island seiners.

Thanks for your consideration with this matter,

Jonathan Edwards

### Dear BOF,

I would like to comment on Proposal 62. I am a 44 year resident of Kodiak, Alaska. and have been set netting for salmon commercially on the Westside of Kodiak Island for the last 43 years. Set netting for salmon on the Westside3 of Kodiak Island is on a severe decline. This is not due to the lack of abundance of salmon. There are 2 main factors driving this decline. #1 is the efficiency of the seine fleet. When I started set netting, the average seins boat was about 40 foot, with about a 2-300 hp engine, with a seine skiff, powered by a35-70 hp outboard. Seines were generally shallow, with relatively light lead lines compared to today. Now, boats are much larger, and the combined horsepower of the modern jet skiff and seine boats in the neighborhood of 1000 hp, or more. With the larger seines and very heavy lead lines, these are WAY more effective at scooping salmon than when I started set netting. Meanwhile, set nets haven't changed much. You put the net out, and fish run into them, period, end of story.

The #2 reason is fisheries management style. This is demonstrated by the data that shows that way more fish are being harvested in the terminus areas than has been in the past.

We desperately need more fishing time without seines in the water to remain relevant. and SOLVENT.

Thank you for your consideration in this matter,

Jonathan Edwards

December 26, 2023



Dear Board of Fisheries Members,

I'm a former fisheries biologist with ADF&G and I currently do data analytics for a healthcare organization. For over 20 years, I've also been a setnetter with my husband and, later, children, in Uganik Bay in Kodiak. Fishing is foundational to the structure of our family's life and rhythm. Watching my kids gain competence in core life skills by engaging in the fishery has been a joy. Raising children on the beach and sea while learning where their food and livelihoods come from is integral to our values.

Unfortunately, in recent years setnetting has become less and less of a financially sustainable part of our year. To make our household function, I now have to take leave from a "real" job to spend time at our family site instead of working seasonally for ADF&G. Each year we hire younger and less experienced crew because earning \$4,000 for three months of work isn't an offer than can compete with other opportunities. The financial difficulties are felt across the NW setnet fleet and are not just a matter of individual fishing choices or the vagaries of a poor season.

I applaud the efforts of the Board of the Northwest Setnetters Association and the members of the proposal committees, as well as individual community members, for thinking creatively and broadly about how to shore up our shrinking industry. When I first saw the proposal book, I wanted to be sure the magnitude of the problems justified the scope of the solutions being proposed. Looking at the data, I believe there is merit to the concepts behind all of the proposals that support NW setnetters – 62, 63, 64, 70, and 71. When I look at the percentage of the sockeye and pink harvests in the NW District and Inner and Outer Karluk Sections, the decline is persistent and significant, as shown in the graphs below.

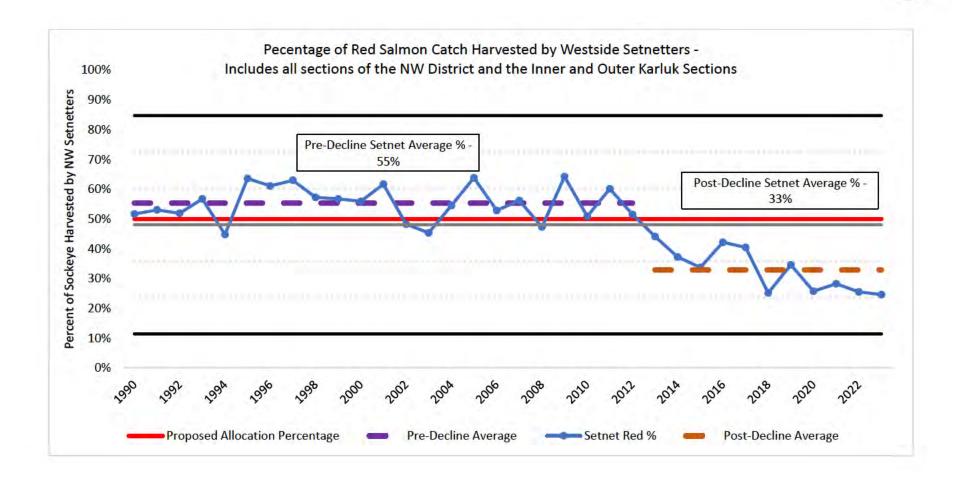
Setnetters need time in the water. We can't fish longer or harder or in better locations. We adapt to changing conditions by buying new and different nets, trying different equipment for cleaning our gear, and doing more with less. But at the end of the day, we can only catch fish when we're allowed to have our gear in the water. As ecosystems, technology, and management have changed, we're being squeezed out. De facto changes to the allocation of the fishery are being made without regard to the long history of setnetting or the fact that we have no alternative fisheries resources.

On the other hand, Proposals 72, 72, and 74 from the Kodiak Seine Association and individual seiners, all would serve to continue the trend of increasing salmon catch allocation away from setnetters and towards the seine fleet. Proposal 74 would be especially damaging because many setnetters would sit idle while others would be corked off by the highly mobile seine fleet who have no minimum distance they must maintain from setnets.

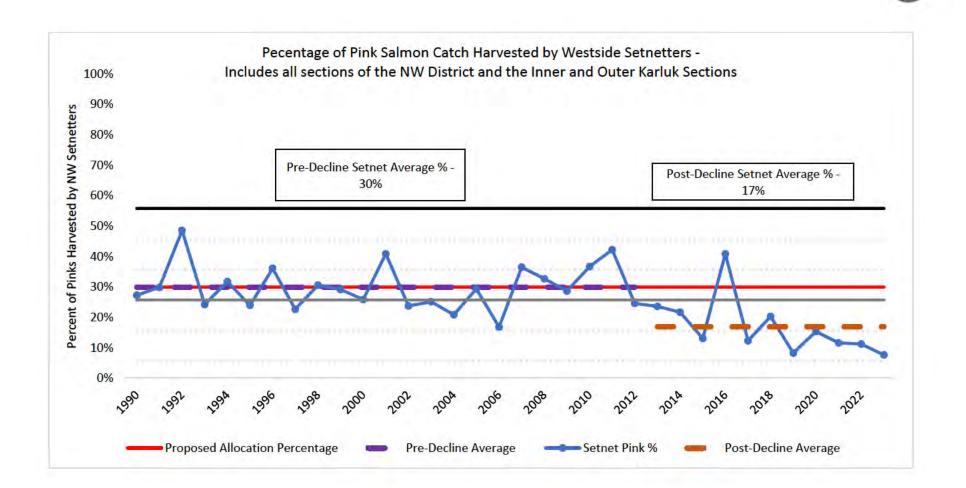
All Kodiak salmon fishermen are facing difficult times. Terrible market conditions impact everyone and I think we are all concerned about what the future holds. But even at this moment, it is essential to find ways to move forward and salvage our fishery without gutting anyone else's livelihood.

Thank you for your time and consideration in weighing these challenging issues.

Aaren Ellsworth



**PC35** 



**PC35** 



Dear Board of Fish Members,

I appreciate your consideration of my comments related to this year's Kodiak area commercial finfish proposals. I have been fishing salmon in Kodiak since 1992 and have owned and operated a set gillnet site in Uganik Bay in the Northwest District since 1999.

As was recognized by the Kodiak Advisory Committee, Kodiak's Westside setnet fishery is struggling and efforts should be made to find workable solutions to support the set gillnet fleet. The Northwest Setnet Association has submitted a range of proposals to bring this issue to the table. Data clearly shows the decline in the percentage of catch in our gear type over time. It is a complex of factors that have led to the current situation, highlighted by significant changes in the environment, changed Karluk River escapement goals, and the increased catching power of the Kodiak purse seine fleet. Cause and effect can be hard to pin down in our dynamic mixed-stock fishery; however, the problem is real and we setnet fisherfolk need help.

One clear thing is that we setnetters are suffering the burden of environmental change. Due to the nature of our gear type, we can't move locations to chase fish if returning fish take a non-historic route, and we are dramatically impacted by increased annual algae blooms that dirty our nets. We fundamentally need more time and opportunity in the execution of our annual fishery to bring our catch to a level that will allow our gear type to survive.

I would like to voice strong support for proposals 62, 64, and 71 that were proposed by the Northwest Setnet Association. These proposals can be easily integrated into current management and have minimal impact on the execution of the fishery for other gear types.

I support proposal 70 because it shines a light on the decline of our gear type and is a launching point to shift the current framework for management such that it might help generate an increase in fishing time and the opportunity needed to help our setnet gear type survive into the future.

I oppose proposals 72, 73, and 74. These proposals all could harm setnet opportunity and catch, tipping the balance further against our gear type. Proposal 74 could be particularly harmful to the historic mixed stock westside setnet fishery, and although arguments will be made that it allows ADF&G managers more tools for protecting smaller systems, these tools are not needed because the department can already protect these systems by opening and closing the inner bay areas.

Thank you for your consideration and thoughtfulness.

Sincerely,

Bryan Ellsworth

# Submitted by: Vasilian Fefelov

# Community of Residence: Homer, Alaska

# **Comment:**

I think it will be unfair for jiggers on proposal 54 because jiggers just start fishing around that time and if the pot boats take half the quota before jiggers start fishing seems unfair

Proposal 54: Oppose Proposal 55: Support

# Submitted by: Edwin Fisher

Community of Residence: Astoria, Or

## **Comment:**

Permit stacking I support this proposal with it being sunsetted in three years to evaluate its effect on the fishery for the time it was in place.

Proposal 45: Oppose	Proposal 46: Support	Proposal 47: Support
Proposal 49: Oppose	Proposal 50: Support	Proposal 51: Support
Proposal 63: Support With Amendments		Proposal 64: Support
Proposal 66: Support	Proposal 67: Oppose	Proposal 68: Oppose
Proposal 73: Support		
	Proposal 49: Oppose Proposal 63: Support With A Proposal 66: Support	Proposal 49: OpposeProposal 50: SupportProposal 63: Support With AmendmentsProposal 66: SupportProposal 67: Oppose







Submitted by: Esther Freeman Community of Residence: San Diego, CA Comment:

Dear Board of Fish Members,

I am a dear friend of someone who will be affected by the new proposals taking place. I live in San Diego, CA, and am connected to a fishery in Alaska.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Esther Freeman



Submitted by: Darin Gilman Community of Residence: Cordova Comment: Proposal 59- Oppose



Submitted by: Leigh Gorman Thomet

**Community of Residence:** Kodiak

**Comment:** 

For the upcoming January 2024 meeting in Kodiak.

To all BOF Members,

Proposal 59: Oppose

My name is Leigh Gorman Thomet. I've been a commercial fisher/mariner for 40 yrs.

With my family, I have owned and operated a setnet site on Kodiak Island for 33 yrs. For the past 3 years I have not fished my site due to the loss of my husband in 2019. Currently my site is for sale.

I strongly oppose Proposal 63: permit stacking for the Kodiak Setnet Fleet.

Even though I would BENEFIT from permit stacking I believe it is not a healthy choice for ANY of Alaska's salmon fisheries without first having an Optimum Permit Study conducted (like that conducted by Gunnar Knapp- retired Professor of Economics at UAA Institute of Social and Economic Research for the Bristol Bay Fishery) for these reasons:

1. Permit stacking is not about me and my personal hardship and shouldn't be changed due to the current low prices, salmon returns, climate change, gear conflicts and so forth. Those issues have always been a given and fishermen have always adjusted (or not) to these conditions. For as long as the salmon fisheries have been around the salmon runs have fluctuated and so have the markets-there are no guarantees with fishing and we should not expect them to be so.

The origin of permit stacking was from the enabling legislation of HB 286 in 2002 and HB 251 in 2005. These bills were introduced to consolidate fisheries suffering from large numbers of underutilized permits and an excess of harvesting capacity (like that of Bristol Bay at the time) as stated by the bill's sponsors.

2. There are approximately 188 setnet permits for the Kodiak district. If permit stacking is allowed, eventually only 94 permit holders will conduct this fishery.

-How many of those will be out of state residents with ownership? What will the consequences be?

- What impact will this have on the economic engine that is part of Kodiak's economy when participation is cut in half?

- The Kodiak seine fleet has asked for permit stacking in the past and it was denied. Bristol Bay has asked for permit stacking in previous Board cycles even though that fishery has benefited from dual permit boats.

-What impact will permit stacking have on the state's economy if stacking is allowed throughout Alaska's salmon fisheries?

-What will become of Alaska's coastal communities?

Fishermen have and will continue to ask for Permit stacking not fully understanding what it is intended for and its origin. From my observations over the past 40 years, some don't care.

3. Alaska's fisheries employ the most people over any other sector of our economy, like mining, oil, timber, etc. What will be the UNINTENDED consequences from substantially less participants?

4. Do not allow permit stacking without an optimum permit study conducted to validate the need. Period.

5. I believe the non residency of a proposer should be taken into careful consideration by the board when enormous changes to Alaska's fisheries are being sought.

It is my hope that you, the BOF members, would adopt the restructuring criteria (like that of permit stacking) that would have be to utilized before such proposals are even considered, such as those in the Alaska Board of Fisheries- Restructuring Proposal Forms in the link below:

https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/forms/rest-prop-form.pdf

It is also my hope that the BOF members understand the monumental change of such implementations, the history behind permit stacking, its intent, and the unforeseen consequences that may occur.

I will continue to reside in Kodiak. I love our unique community. I care greatly about Alaska's fisheries, the direction they're going, who is allowed to fish them and will remain proactive in some capacity in upholding them.

Impact, prescience and accountability are significant words when major change is at hand.

Please consider all of them.

I wish you all the best with your calculated decision making.

Leigh Gorman Thomet

Proposal 63: Oppose



**PC42** 

Submitted by: Leigh Gorman Thomet

Community of Residence: Kodiak

**Comment:** 

For the upcoming January 2024 meeting in Kodiak.

To all BOF Members,

My name is Leigh Gorman Thomet. I've been a commercial fisher/mariner for 40 yrs.

With my family, I have owned and operated a setnet site on Kodiak Island for 33 yrs. For the past 3 years I have not fished my site due to the loss of my husband in 2019. Currently my site is for sale.

I strongly oppose Proposal 63: permit stacking for the Kodiak Setnet Fleet.

Even though I would BENEFIT from permit stacking I believe it is not a healthy choice for ANY of Alaska's salmon fisheries without first having an Optimum Permit Study conducted (like that conducted by Gunnar Knapp- retired Professor of Economics at UAA Institute of Social and Economic Research for the Bristol Bay Fishery) for these reasons:

1. Permit stacking is not about me and my personal hardship and shouldn't be changed due to the current low prices, salmon returns, climate change, gear conflicts and so forth. Those issues have always been a given and fishermen have always adjusted (or not) to these conditions. For as long as the salmon fisheries have been around the salmon runs have fluctuated and so have the markets-there are no guarantees with fishing and we should not expect them to be so.

The origin of permit stacking was from the enabling legislation of HB 286 in 2002 and HB 251 in 2005. These bills were introduced to consolidate fisheries suffering from large numbers of underutilized permits and an excess of harvesting capacity (like that of Bristol Bay at the time) as stated by the bill's sponsors.

2. There are approximately 188 setnet permits for the Kodiak district. If permit stacking is allowed, eventually only 94 permit holders will conduct this fishery.

-How many of those will be out of state residents with ownership? What will the consequences be?

- What impact will this have on the economic engine that is part of Kodiak's economy when participation is cut in half?

- The Kodiak seine fleet has asked for permit stacking in the past and it was denied. Bristol Bay has asked for permit stacking in previous Board cycles even though that fishery has benefited from dual permit boats.

-What impact will permit stacking have on the state's economy if stacking is allowed throughout Alaska's salmon fisheries?

-What will become of Alaska's coastal communities?

Fishermen have and will continue to ask for Permit stacking not fully understanding what it is intended for and its origin. From my observations over the past 40 years, some don't care.

3. Alaska's fisheries employ the most people over any other sector of our economy, like mining, oil, timber, etc. What will be the UNINTENDED consequences from substantially less participants?

4. Do not allow permit stacking without an optimum permit study conducted to validate the need. Period.

5. I believe the non residency of a proposer should be taken into careful consideration by the board when enormous changes to Alaska's fisheries are being sought.

It is my hope that you, the BOF members, would adopt the restructuring criteria (like that of permit stacking) that would have be to utilized before such proposals are even considered, such as those in the Alaska Board of Fisheries- Restructuring Proposal Forms in the link below:

https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/forms/rest-prop-form.pdf

It is also my hope that the BOF members understand the monumental change of such implementations, the history behind permit stacking, its intent, and the unforeseen consequences that may occur.

I will continue to reside in Kodiak. I love our unique community. I care greatly about Alaska's fisheries, the direction they're going, who is allowed to fish them and will remain proactive in some capacity in upholding them.

Impact, prescience and accountability are significant words when major change is at hand.

Please consider all of them.

I wish you all the best with your calculated decision making.

Leigh Gorman Thomet

Proposal 63: Oppose



#### Comments to proposal 57

I am opposed to this proposal. The sac roe herring and food/bait herring fisheries have been managed separately since the 1970's. I have been involved in the food/bait herring fishery in Kodiak since 1980. The Fish and Game Department has always had strict management guidelines regarding the food/bait fishery. In my opinion, the fishery is well managed allowing optimal harvest each season without detriment to the sac roe fishery.

In the early 1980's the food/bait harvest had a 100 ton harvest guideline for the island. Whenever a harvest was put onboard the harvester was required to contact F&G via single side band radio as to amount and area. As the stocks increased and F&G was comfortable overharvest could be avoided, the quota increased to 200 tons annually. In 1988, F&G proposed to the BoF that of the 20% guideline harvest level for Kodiak herring 2% would be allocated to food/bait and 18% would be allocated to sac roe. This proposal passed unanimously.

Further adjustments were made to the management policies with the 1992 Kamishak district herring management plan and again in 1993 with more defining strategies including allowing longer and deeper purse seines. This change in gear restrictions of purse seines changed the fishery from months long manageable to an unmanageable fleet of purse seiners, overharvests, and eventually the closure of the fishery early in 1998 and completely in 1999 and 2000. The fishery was not reopened until limited entry was established and guidelines established that require the entire fishery be a co-op with only one vessel being allowed to harvest at a time. Due to the required management policies this co-op has worked out well. There has not been an area that has suffered overharvest since implementation.

The manageable/unmanageable aspect of this fishery cannot be overstated. The harvest and prosecution of the fishery is totally dependent on market conditions. Nearly all the harvest is typically used as bait for the crab, cod, and longline fisheries. For the decades I have been involved in the fishery, samples have been sent out to herring food processers to try and gain additional markets. This has been unsuccessful, mainly due to the high cost of catching, processing, and shipping compared to their existing sources. As a bait product, the Kodiak herring has earned its' niche however the market is only so big. A large increase in quota would not necessarily equate to increased harvest. If increased quota and harvest capabilities were to happen, there is already a limited entry permitted fleet in place that could be implemented. The decision to use only one vessel is a F&G requirement, in order to stop the dumping and wastage of resource the last time an unrestricted fleet of purse seiners entered the fishery.

This fishery is already under limited entry management. Both trawl and seine permits coexist. By comingling the sac roe fishery with the food/bait fishery, participants would be allowed in fisheries they did not qualify for. Trawlers are acceptable in the food/bait fishery but would have quality concerns in the sac roe fishery. An increased number of deep seines has already proved detrimental to management policies in the food/bait fishery. For these reasons I ask the BoF to deny this proposal.

Sincerely,

Mike Haggren



#### Dear Board of Fish

Thank you for your time and work around the state making hard decisions on our commercial and sport resources.

My name is Jamin Hall I first arrived in Kodiak in 2005 in my early 20's to work at a set net site in Uganik Bay for the summer salmon season. I made friends and grew to love the fishery and the area and continued to return summer after summer. I met my future wife, Naomi, who grew up set netting in Uganik with her parents and sister. In 2011 I started participating in other fisheries and staying in Kodiak year round. In 2014 I had the opportunity to purchase a friends' site in Uganik and become a permit holder; invested in the fishery. I fished the site with my brother for a couple years before, and a couple years after Naomi and I had our first son. We now own and run the site together, with our two boys who are third generation setneters in Uganik Bay.

I do not expect to make enough setnetting to live on year round; initially, after buying my site I fished pot cod, halibut, and tanner crab as crew in the off season, and now I work a variety of jobs in town to support my family. Unfortunately, in the last 5-6 years I can barely even afford to spend the 3-4 months participating in this fishery that used to be fully capable of supporting families year-round. I fear both for my family, and for future generations that this way of life is going to become economically unviable and will go extinct. This fishery is in dire need of support through changes in regulation that allow us, as a fishery, to catch more salmon.

I am in support of the proposals 62, 64, 70, and 71 submitted by the Northwest Setnetters Association. These are all proposals which will help our ailing fishery; hopefully averting it's extinction and our way of life. If we do not get any help we will continue to see diminishing catches and I will not be able to continue this tradition with my family. As it stands now I cannot in good conscience hire crew without telling them that they might not make any money. Most of my crew for the last 4-5 years I have paid far more than a standard crew share of 10% because I couldn't stomach sending them home with nothing. This comes out of my own pocket and I just can't afford it.

I oppose proposals 72, 73, 74. These are harmful to set netters at a time when we need help.

Thank you for your time and consideration,

Jamin Hall



## Submitted by: Naomi Hall

# Community of Residence: Kodiak, AK

#### **Comment:**

My name is Naomi Hall and I am a Kodiak setnet permit holder since 2018, fishing in Uganik Bay since 1991. I am a second generation setnetter, raising third generation setnetters, who love to go fishing.

I am writing in support of proposals 62, 64, and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

My parents raised my sister and I setnetting and I have fond memories of fishing each summer. I fished my way through college each summer; however, with recent fishing tends I have no idea how I did that. The way things have been trending I don't know how much longer we can continue setnetting when our business is either barely breaking even or losing money. The time, effort and energy involved to just try and make setnetting a viable business for us just hasn't been penciling out.

I am also opposed to proposals 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Naomi Hall

Proposal 62: Support Proposal 73: Oppose Proposal 64: Support Proposal 74: Oppose Proposal 71: Support

Proposal 72: Oppose



Submitted by: Adam Haughey

**Community of Residence: DURANGO** 

#### **Comment:**

Proposal 62: I strongly believe this proposal should be ADOPTED to allow a more even distribution of the sockeye and pink salmon throughout the fleet.

Proposal 64: I strongly believe this proposal should be ADOPTED to allow better efficiency of each set gillnet.

Proposal 70: I strongly believe this proposal should be ADOPTED in order to allocate salmon catch more fairly and more consistent with historical catch levels.

Proposal 71: I strongly believe this proposal should be ADOPTED as to protect fragile sockeye and chinook returns to the Karluk river system.

Proposal 66: I strongly believe this proposal should be REJECTED because this would simply lengthen a seign by 50 fathoms and increase an unfair advantage to the seign fleet and further disadvantage the set gillnet fisheries.

Proposal 72&73: I strongly believe these proposals should be REJECTED because thiey would allow intercept of fish traveling to the central section of the Northwest Kodiak district and adversely affect fishing time in this area.

Proposal 74: I strongly believe this proposal should be REJECTED due to the severe adverse effect it would have on the central section of the NW district and would concentrate fishing in much smaller areas.

Proposal 62: Support Proposal 71: Support Proposal 64: Support Proposal 72: Oppose Proposal 66: Oppose Proposal 73: Oppose Proposal 70: Support Proposal 74: Oppose



Submitted by: Claire Haughey

Community of Residence: Larsen Bay, Alaska

# **Comment:**

Dear Board of Fish,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since I was born in 2001 for my families multigenerational set net business. I have lived on Kodiak Island every summer of my life.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Claire Marguerite Haughey

Proposal 62: Support Proposal 71: Support Proposal 64: Support Proposal 72: Oppose Proposal 66: Oppose Proposal 73: Oppose Proposal 70: Support Proposal 74: Oppose



# Submitted by: Lauren Haughey Community of Residence: Uvalde,TX

## **Comment:**

Dear Board of Fish Members,

My name is Lauren Haughey a third generation commercial Salmon setnetter in Uyak bay. I have worked in my families setnet operation located in Uyak bay since I was a little girl

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I have grown-up, watching my grandfather, run the operation and then my father. When I was a baby, my parents would take me out while they were fishing and put me in the totes full of fish while they worked. I think that is where my love for set netting started. I remember always wanting to get better at picking and learn more about the fishery that had been in my family for now 60 years. At the age of 13 I became full-time crew, and at the age of 17 started running my own skiff. I have had the privilege of growing up working with my two older sisters, my younger brother and my parents. These shared experiences working together, have built a deep bond and connection between my family as we work hard to provide nutritious food for the world.

Most teenage girls spend their summers at summer camp or hanging with friends, but I have been blessed with getting to spend my summers on the water working hard and with my family. I can say with certainty that setnetting is something that I want to do for the rest of my life and something that I want my kids to have the option to experience. The way things have been going the past few years it is realistic to imagine a future where is that netting no longer exists, because one cannot financially support themselves in the business. Additionally, the decline of the runs in recent years places an added stress on the industry. It's a hard realization to come to that the one thing that you love most in the world and feel called to might not be around forever. I don't know where I would be, or the person that I would be without set netting, and I hope that I never have to find that out.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Lauren Haughey

Proposal 44: Support With A	Amendments	Proposal 45:	Oppose		
Proposal 46: Support With A	Amendments	Proposal 47:	Oppose	Proposal 48:	Oppose
Proposal 49: Support With A	Amendments	Proposal 50:	Oppose		
Proposal 51: Support With A	Amendments	Proposal 52:	Oppose	Proposal 53:	Oppose
Proposal 54: Support		Proposal 55:	Oppose	Proposal 56:	Oppose
Proposal 57: Oppose		Proposal 58:	Oppose	Proposal 60: 0	Oppose
Proposal 61: Oppose	Proposal 62:	Support	Proposal 63:	Oppose	Proposal 64: Support
Proposal 65: Oppose	Proposal 66:	Oppose	Proposal 67:	Oppose	Proposal 68: Oppose
Proposal 69: Oppose	Proposal 70:	Support	Proposal 71:	Support	Proposal 72: Oppose
Proposal 73: Oppose	Proposal 74:	Oppose			