



Submitted by: Richard (Rick) Metzger

Community of Residence: Custer Wa. and Alitak Alaska

Comment:

Dear Board Members

Please consider my comments in support of proposals 63 and 64 and opposition to 66.

After participating in the Kodiak salmon commercial fishery for 62 consecutive seasons and of being an original limited entry recipient of beach seine, purse seine and set net permits I offer these comments and observations.

Proposal 63 (support)

Our family has a 3 generational set net operation in the Alitak District. Over the years we have transferred permits back and forth between family members and associates to keep gear in the water with jobs for local crew members. Over the years we have developed the equipment, gear and skill to operate one permit by one man. It takes 2 or 3 to efficiently and safely operate 2 permits.

The economics and commitment of time now make it impossible for all family permit holders to participate. Some say its time to break up family dynasties and spread the permits to new entrants and that consolidations are bad. I disagree, look around the entire industry is consolidating. In 2023 about 1/3 of all Kodiak set net permits were not fished and very very few standalone permits were sold.

Our permits are the family jewels and we are not going to sell into a depressed market to carpetbagging speculators. Bottom line if proposal 63 fails 2 long term skilled local crew will not have a job at our camp in 2023.

Proposal 64 (support with amendment)

The harvest percentage of set net fish in the Kodiak area has steadily declined over the years mostly due to management, advancements in seine boat size and hp, gear and equipment and skill. The set net fishery is operated very nearly the same now as in 1940.

An increase in the length of and how the seaward end of a set net can be configured may possibly (or not) increase the efficiency of catch of the fish that come in contact with the net.

I would like to offer an amendment to allow a 50 fathom portion of the seaward end to be anchored, drifted or towed in any configuration.

Proposal 66 (oppose)

I participated in the Kodiak seine fishery for many of my 62 seasons. I used a lead on both shoreward and seawards ends. The large mesh lead web works well for its intended purpose of leading fish off the beach into deeper water and the capture net.

Most leads are now sewn to the seaward end to extend the reach of the seine but it is sometimes difficult to hold the fish in the large mesh web when they are crowded or the net is under hard tow. Evidenced by larger fish often gilled in the lead web.

Changing the allowed mesh size WILL increase the reach and efficiency of sein gear and further reduce the overall percentage of set net caught harvest in the Kodiak area.

The Kodiak seine fleet has already eaten it`s self with bigger boats, advancements in gear and technology and skill levels evidenced by the number of latent permits in the fishery. Their harvest percentage continues to go up while participation declines.

A better solution might be to put the leads back on the shore end by setting into the beach and allowing the skiff and boat to swap ends during the tow and spinning the boat at closing of the set to draw in the lead web first. It works.

Proposal 63: Support
Amendments

Proposal 64: Support With Amendments

Proposal 66: Support With



PC103

Submitted by: Tollef Monson

Community of Residence: Kodiak

Comment:

Dear Board of Fish Members,

This year is a critical year for set netters in the West side of Kodiak at the BOF. Since 2012 I have seen a substantial decline in the overall health of our set net fishery although I have been a Kodiak set netter every summer since 2001. Without help from proposals 62, 63, 64, 70, 71 we will see our grey haired fishermen retire without new people to come in behind them for lack of being able to catch fish and make a living. The knowledge will fade and further erode the loss of culture in Kodiak and Alaska.

Many of us setnetters or in most professions can't just jump up and leave to join another fishery like Bristol bay without money in the bank. Since we have been in many consecutive hard years, our savings dwindle and we become more financially fragile. I have fished many other Kodiak fisheries on different boats as crew so I don't want to take away from seiners or boat owners who have worked hard to get where they are but I do believe that there is room for both gear types. Fish run patterns have changed and we can't move to chase fish with 15, 150# anchors and even bigger mooring anchors. The Board can help us gain some of our equity in fish back without hurting the seine fleet. Unfortunately, as setnetters we lack the ability to execute other fisheries with our infrastructure.

In the 20 years I have been at my site we generally catch 5 or less kings a year and almost nothing for non-Kodiak sockeye. More time in the water for setnetters isn't going to drastically impact any runs in different areas of the state nor on the island. We catch so few of the fish going by. I have many hundreds of hours of GoPro footage of salmon swimming into the hook end of our net and back out to go on their way. It is ineffective, yet one of the most iconic Alaskan connections to ocean and remote land.

For many of our crew it is the highlight of their formative years and changes their perception of the planet we all live. It's important to have these ambassadors return to the concrete jungles and tell of Kodiak remote multi-generational people still able to make a living through simple types of gear.

I am opposed to seiners getting more fishing time through proposals 72, 73, and 74 as it would in the end reduce set net fishing time by catching more fish before escapement has been fulfilled. 74 would be particularly damaging by congregating seiners into specific bays rather than waiting and spreading them out.

66 needs to be passed for the seiners to help them simplify the amount of stuff being packed into a small boat.

Thank you, Tollef Monson

Proposal 54: Oppose
Proposal 64: Support
Proposal 72: Oppose

Proposal 55: Support
Proposal 66: Support
Proposal 73: Oppose

Proposal 62: Support
Proposal 70: Support
Proposal 74: Oppose

Proposal 63: Support
Proposal 71: Support



PC104

Submitted by: Aleksandro Murachev

Community of Residence: Homer Alaska

Comment:

i oppose 54, and support 55

Proposal 54: Oppose

Proposal 55: Support



PC105

Submitted by: Doreece Mutch

Community of Residence: Kodiak, Alaska

Comment:

Board of Fisheries,

I am opposed to proposal 57. This proposal is based on the assumption that increasing the amount of Food and Bait Herring available for harvest will create new markets for food herring. This is not the case in most Alaska fisheries, including salmon, pollock, black cod, halibut, and flat fish. Our Alaskan fisheries have plenty of supply but are facing significant challenges on the market side. It would be irresponsible to take from the current viable Kodiak Food and Bait Herring Fishery for the POSSIBILITY of creating new markets which do not exist today. If there were viable food markets the already existing Kodiak Food and Bait Fishery would be utilizing them. The Dutch Harbor and S.E. Food and Bait Fishery have been leaving 1000's of tons unharvested. If there was a herring food market it would have been capitalized on by those fisheries already. Kodiak Seiners have participated in the Dutch Harbor Food and Bait Herring Fishery in the past and they would do so today if there was a market for the unharvested quota. The present guideline harvest levels are too low to allow all the existing Kodiak Food and Bait Herring permit holders to participate. A solution moving forward is to roll over any unharvested herring from the Spring Sac Roe Season into the already existing Fall Food and Bait Fishery. This could allow more of the existing permit holders to participate, and it doesn't take from any of the present stakeholders.

I bought my limited entry Kodiak Food and Bait Herring Permit at market value and Proposal 57 would devalue my permit and make it worthless.

Thank you,

Doreece Mutch

Proposal 57: Oppose



PC106

Submitted by: Max Mutch

Community of Residence: Anchorage, Alaska

Comment:

My name is Max Mutch, and I am a third generation fisherman—born and raised on Kodiak. For the last three years I've worked as a crew member for the fall food/bait herring season, and for the last three years I've depended on this season to help pay the bills. It's a fishery that I truly appreciate the opportunity to take part in, especially because I get to do it with family. Because of my direct experience with the food/bait herring fishery, I think my perspective on the issues presented by Proposal 57 can provide some helpful insight.

Kodiak herring permits for both food/bait and sac roe fisheries are limited entry. The number of permits on the market is directly tied to the amount of fish being harvested. The amount of fish being harvested is determined by several factors but hinges on the market demand for product and the amount of fish that can be sustainably removed from the environment. For the last three years that I've fished the fall food/bait herring season, the quota has averaged about 800 tons, and it only takes us around twelve days to reach that quota. The fall food/bait herring fishery simply isn't large enough to justify increasing the number of available permits. This fishery is currently operating efficiently and effectively, so why would we change a system that is running so well?

There has been some discussion that increasing the number of available food/bait herring permits or absorbing food/bait and sac roe into one permit would open the market up for food herring, as well as allow boats to catch their own bait for other fisheries. Not only would either of these options destroy the value in the current market for food/bait herring, but there is a lot of uncertainty and room for error. First, there is the very real possibility of over-harvesting. Second, there is the fact that the food/bait herring season in the fall is fished with completely different tactics than the sac roe season in the spring. Lastly, there is no guarantee we could jump-start a food herring market. Several Alaskan fisheries are already having difficulty selling all of their stocked product.

I do, however, personally love smoked herring kippers, and I think it would be a huge win for Kodiak if we could find a way to market our herring for food. Immediately increasing the number of available permits for bait/food herring is not the way to do this. If we want to test the market, take a small sample from the current quota, and see what happens.

In summary, the food/bait herring fishery is currently a highly successful fishery, and allowing sac roe permit holders to fish the food/bait season or increasing the number of available food/bait herring permits would destroy the value of the current food/bait herring market. The current quota for food/bait herring isn't remotely large enough to support additional permits, as it isn't even large enough for all the current permit holders to fish the season. Several Alaskan fisheries are already struggling. It doesn't make sense to risk losing an already

successful fishery for the possibility of starting a food market from scratch. On a personal note, the fall bait/food herring fishery is my job. It's my livelihood, and I don't want to see that go away. Thank you for your time.

Proposal 56: Support

Proposal 57: Oppose

State of Alaska

Board of Fisheries,

I am opposed to Proposal 57

There are two separate, limited entry Herring fisheries in Kodiak. The distinguishing factor that separates the Sac Roe Fishery from the Food and Bait Season is the timing of the harvest, as they are several months apart. The BOF has the authority to change the season, but in this case changing the season as requested in proposal 57 would essentially be issuing more permits into the already existing fishery. Proposal 57 would also increase the gear size to match the much larger nets of the Food and Bait fishery. This proposal would create a lot of permits for a fishery that is already limited entry without going through the process we already went through in 2000 when the fishery went limited entry. There are over seventy Sac Roe limited entry permits and only nine Food and Bait limited entry permits. The impact on the value of existing Kodiak Food and Bait Herring Permits is a consideration that cannot be ignored. Proposal 57 asks to take 1,000 tons of herring from the Sac Roe quota and dedicate it to the new food and bait season. This action has two major issues. The first issue is that the Sac Roe season has been harvesting almost all its quota annually except for 2023. (2023 should not be used as a barometer for managing decisions as most species markets are upside down leaving unharvested fish in almost every sector of Alaska’s seafood harvest.) The average Kodiak Sac Roe Herring Quota is around 2,500 tons with much larger quotas in recent years. Proposal 57 asks to take 40% of that quota and allocate it to a food herring fishery that is nonexistent in Kodiak today despite efforts over the years to promote it by giving out tons of free herring as samples. 150 tons of cost recovery herring from the existing Food and Bait season has been available through ADF&G to anyone that wants to harvest it, no permit required. This would be an excellent opportunity for someone with a herring food market to access enough fish to show that a market exists before asking for quota from another fishery. No one with a food herring market has ever put in a cost recovery bid for these herring. The second problem with the proposal is that the additional quota added into the already existing bait herring quota would saturate the market. The market for these winter herring is limited, Proposal 57 would take market share from the existing fishery and do nothing to increase the market.

Our Kodiak Food and Bait fishery has come under some public scrutiny because of the low number of participants so I wanted to forward some data that shows it compared to the other two food and bait fisheries in the state based on the past four-year average.

Dutch Harbor Food and Bait Herring	3,837tons/yr.	3 permits or less	1,280 tons/permit
S.E. Food and Bait Herring	7,632tons/yr.	3.5 permits	2,180 tons/permit
Kodiak Food and Bait Herring	650/tons/yr.	9 permits	72tons/permit

The Dutch and S.E. fisheries are both open access. The Kodiak fishery is limited entry. I am providing this information because it shows, like we often see with limited entry fisheries, there are more permits in Kodiaks limited entry fishery than you would normally see in an open access fishery. It looks like both the open access fisheries fall short of catching their guideline harvest level, which supports the claim that the market for our winter food and bait seasons is limited.

When you consider this data and the fact that the local **ADF&G managers have only allowed one boat to participate** at a time it becomes clear why one boat has been doing most of the harvesting in our present food and bait herring fishery. CFEC created a limited entry program for our Food and Bait fishery because prior to 2000, the number of boats fishing had increased, and was still increasing, and the ADFG managers had found that controlling the catch to the guideline harvest level numbers was exceedingly difficult. Considering the fact that the department has only allowed one vessel to fish for food and bait herring, how is it a good idea to add more participants into the fishery, when the already existing limited entry fishermen are not allowed to participate?

The existing Food and Bait fishermen have never asked for more quota because the Sac Roe fishermen have been harvesting their portion, and the market to sell the Winter Food and Bait herring has been limited. I think it is reasonable to roll over any unused quota from the spring Sac Roe Season into the already existing fall Food and Bait fishery. This would allow more of the existing limited permit holders to participate in the fishery by having enough quota available to alleviate ADF&G's concern of overharvest.

Thank You

Sam Mutch

I am a permit holder and participant in both Kodiak's spring Sac Roe fishery and the fall Food/Bait Herring fishery for over twenty-five years.



Submitted by: Sydney Mutch

Community of Residence: Kodiak, Alaska

Comment:

I am a permit holder and participant in the Kodiak Food and Bait Herring Fishery. I am opposed to Proposal 57.

I believe it is critical that we reflect on the historical facts presented from this fishery to guide us toward making an educated decision that will protect environmental implications and future markets. In 2000 the Kodiak Food and Bait Herring Fishery was in turmoil due growing participants in the fishery and concerns of over harvesting. When the fishery was not limited entry there was not enough quota for all participants involved and the fishery managers were concerned with over harvest. As a solution the Kodiak Food and Bait Herring Fishery was transitioned into a limited entry fishery. This allowed Fish and Game to manage the harvest under their policy that only one boat was allowed to go out and fish at a time. A Co-op was formed that allowed all the permit holders to continue having a stake and profit in the fishery.

We have already witnessed that too many vessels can have negative implications on this fishery. I am in support of the current Kodiak Food and Bait Herring Fishery, and rely on the income from it. Moving forward with proposal 57 will devalue my permit and I am dependent on my income from this fishery. This proposal could also have lasting implications on the health of the herring stock when an influx of new participants enter making it difficult to manage and not over harvest.

I am always in support of developing new markets and opportunities, and I believe they should benefit the existing Kodiak Food and Bait Herring Fishery. New markets and opportunities will allow more permit holders to annually participate and fish at the same time.

Thank you for the time and thought that goes into making these decisions that protect our fisheries and benefit our communities.

Sincerely,

Sydney Mutch

Proposal 57: Oppose

Dear Board of Fish Members,

As a lifelong, 2nd generation setnetter in the Northwest Kodiak District and a lifetime resident of Kodiak, I am writing to express my strong support for proposals 62, 64, 70 and 71, submitted by the Northwest Setnetters Association.

The reason for the proposals is clear – we setnetters have been losing our share of the harvest and are now at the point where we are unable to make a living. Since 1980, my parents raised a family of 4 on the income from one setnet permit, including building a house and sending both my sister and myself to college. For the last several years (and this pre-dates the price catastrophe from 2023), I have barely been able to pay my crew in a way that is remotely fair for the amount of work they are doing. It is a good thing that I do not have family to support, but I have 3 young nieces who come out every summer to learn the ropes, and it makes me sick to think they won't have an opportunity to make a living at this when they grow up, should they choose.

Since officially taking over from my parents, (finalized in 2015), I have been working harder than ever to increase my harvest, and it is not working. Things I have done include decreasing my mesh size, trying different colors of web, using heavier or lighter leadline, utilizing monofilament web, pressure washing and volume pumping more, and going out on more picks per day. Despite these efforts, fishing at my site has gone downhill.

All the proposals attempt to help the setnetters regain some of the percentage that has been lost. Proposal 62 would help setnetters by allowing us extra fishing time at the front end of openings. With this separate management of gear types, which exists in other parts of the state, setnetters would have a chance to increase harvest percentage before the more efficient fleet begins harvesting. Proposal 64, allowing a larger hook, would possibly increase efficiency of the set gillnet fleet while not impacting the seine fleet. This is one of the only ways we can increase our efficiency, since bigger skiffs or more powerful outboards don't help our gear type catch more fish. Proposal 70 would provide a measurable, comprehensive tool to work with in attempting to regain equity. Proposal 71, mostly just housekeeping, could help Karluk escapement goals be achieved sooner in the season. Without some kind of handicap, we fear that we will go the way of other setnet fisheries in the state and just fade out of existence.

I am also opposed to proposals 72 and 73, which could have negative impacts on the opportunity of the set gillnet fleet and am strongly opposed to proposal 74. The proposal says it would increase harvest opportunity, but the absolute opposite is what would happen for setnetters. If any of these new sections were closed, setnetting would not be allowed in that section during that time. The Department of Fish and Game would not be able to provide pre-season forecasts specific enough for each of these sections, so that would mean that a setnet site could gear up for the season, hire crew, and then find themselves sitting idle the whole time. This would be unsustainable. If I knew there would be no fishing for a large chunk of the season, I could choose to do something else for income, but without being able to plan, I think this would be spell complete ruin for the setnet fishery. This proposal would be completely at

the expense of one gear type that is already struggling just to survive, while providing expanded opportunities for other gear types that have been seeing their historical percentage of the harvest go up already. I believe there are other ways to manage the fishery that don't imperil one gear sector.

Thank you for your time and your important service to our community and our state.

Sincerely,

Adelia Myrick
Kodiak Setnetter

Dear Board of Fish Members,

I have been a Kodiak setnetter since 1980, fishing with my family in Kizhuyak, Viekoda and Uganik Bays. I have lived in Kodiak, Alaska since 1971.

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 has been invaluable to our family, not only as our primary source of income but for the opportunity to be together. The children learned to work hard, appreciate the natural world, and become part of a team in the skiff as well as ashore. They learned every part of setnetting including tying knots, running a skiff, and net mending. Their crew shares helped my two children to attend college. I am grateful that one daughter has continued the fishing business and the other helps during the season. Now our grandchildren are taking part in the set netting life. I hope they can also earn enough to attend college and that the fishery will still be able to support our family.

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,
Betsey Myrick



Submitted by: Rob Nass

Community of Residence: Kodiak, AK

Comment:

My father Fred Nass has been in the marine repair business for over thirty years, performing miracle after miracle to keep our friends and neighbors who fish in seaworthy condition. He and I both depend on the success of our wonderful fleet to harvest the bounty of the sea in a responsible and ethical fashion. If poor management effects the fleet, it effects the whole community. Kodiak is a world class fishing port that deserves to be treated as such.

-Rob Nass



Submitted by: Parry Nelson

Community of Residence: Kodiak AK

Comment:

I Support proposal 51. As a limited entry permit holder for Kodiak Tanner crab i do not think its right that boats doing other commercial activities should be able to harvest crab. Pretty much im being robbed of a resorce that i have invested alot of money to participate in!

First off March 25th is a terrible date to try to judge whats going on with jig effort and catch. its to early, but if thats the day that decides the fate of the Jiggers quota being taken away then going with 10% is obviously the fair choice.

The catch report from the 2023 season clearly shows that early season jig catches before march 25 th are slow but build substantially in april and would of likley kept consistant through May. Its not fair to give jig quota to the pot boats before getting a fair chance to catch it. supporting proposal #55 and setting the bar at 10% is fair for both gear types.

I am in support of proposal 55 and strongly appose 54. the Jig fishery is pretty much the last entry fishery that is easy to get into and is very important for small boats and young people getting into fishing. Jigging cod is best in April and May when the fish move into shallower water and weather becomes nicer and safer for small boats to fish. There should Not be a rush to catch the quota in the months of January-March! In 2023 there was minimal effort in the early months then in April the weather improved and the Jig fleet caught the quota on april 22nd. Going with the pot fishers proposed numbers would push jiggers to fish in unsafe weather and make the jig fishery far less profitable.

Proposal 44: Support
Proposal 62: Oppose

Proposal 51: Support
Proposal 63: Support

Proposal 54: Oppose
Proposal 64: Support

Proposal 55: Support
Proposal 70: Oppose



Preliminary Pacific

<http://www.adfg.alaska.gov/index.cfm?a>

All catch expressed

KODIAK

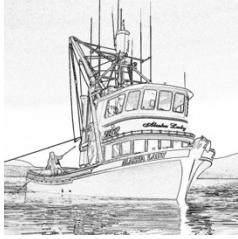
Vessel Count:

GHL Allocations:

Total	Pot	Jig
70	16	54
4,086,777 Pounds	50%	50%

GHL:	Pot		Jig		2,57
	2,043,389 Pounds		2,043,389 Pounds		
Week:	Landings	Catch	Landings	Catch	Landin
			- Opened 1/1/23 -		
Jan 1 - Jan 7			0	0	
Jan 8 - Jan 14			0	0	
Jan 15 - Jan 21			0	0	
Jan 22 - Jan 28			1	Confidential	
Jan 29 - Feb 4			0	0	
Feb 5 - Feb 11			0	0	
Feb 12 - Feb 18			0	0	
Feb 19 - Feb 25			1	Confidential	
Feb 26 - Mar 4			2	Confidential	- Op
Mar 5 - Mar 11	19	1,035,902	18	122,285	0
Mar 12 - Mar 18	29	1,139,165	18	93,054	1
Mar 19 - Mar 25			- Closed 3/15/23 -		0
Mar 26 - Apr 1			41	513,643	1
Apr 2 - Apr 8			48	509,828	1
Apr 9 - Apr 15			30	284,423	1
Apr 16 - Apr 22			40	408,715	0
Apr 23 - Apr 29			- Closed 4/22/23 -		0
Apr 30 - May 6					0
May 7 - May 13					0
May 14 - May 20					0
May 21 - May 27					0
May 28 - Jun 3					0
Jun 4 - Jun 10					0
Jun 11 - Jun 17					0
Jun 18 - Jun 24					0
Jun 25 - Jul 1					0
Jul 2 - Jul 8					0
Jul 9 - Jul 15					0
Jul 16 - Jul 22					0
Jul 23 - Jul 29					0
Jul 30 - Aug 5					0
Aug 6 - Aug 12					0





December 18, 2023

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

Dear Chairman Moriskey and Board of Fish members:

My name is Thomas Nelson from Port Lions. I've been commercial fishing Kodiak since 1977.

Over the years I have witnessed many hardships within the commercial fishing community. Unwarranted proposals from the North and South of the Kodiak District has caused our fleet to lose valuable fishing time and more importantly income.

Now with proposal 70 it obviously is going to cause further division among the Seine and Set Net fleet. The Kodiak seine fleet is usually caught in the middle of disputes, and many times we don't voice or take a stand protecting our livelihood. Many don't seem to understand you can't have everything, but obviously this proposal seems to be based on wanting more, and if you feel you're not able to get a fair share, you want to make sure nobody else can have any. Salmon come in all sizes, and I understand if you use larger mesh to target Sockeye the smaller Pink may not gill. For the last few years on the West Side pinks have been gilling in my net, showing that these pinks may swim freely through a set net.

Over the years traditional sets have been lost to sites being placed there purposely to stop seine boats from earning an income. One particular site just made some boats fish closer to another site. Seine boats catch fish swimming in one direction while a set site may target fish in either direction. Many times, seiners hold behind set sites, and for the most part relations are good. With this unfair proposal, I feel it was produced in haste and possibly anger, not taking into consideration of what this could mean to many fishermen and their families on the Island. I understand it is your position to look at both sides of this proposal I respectfully ask that you take a firm stand against this ridiculous action that would put unnecessary hardships on not only boat owners but crew and their families as well.

Thank you for allowing me to voice my concerns over Proposal 70.

Sincerely,
Thomas E. Nelson Sr.
F/V Alaska Lady



Submitted by: Aaron Nevin

Community of Residence: Kodiak, Alaska

Comment:

My name is Aaron Nevin I am a commercial fisherman from Kodiak. I oppose proposals 62, 70, and I own the F/V Aquarius a 42 foot seine vessel built in 1971. I started fishing in 2001 when i was in junior high working on deck for my dad i continued fishing salmon with him every summer. I started running the boat for him in 2017 and in 2022 i bought the boat from him. The central section is an important area for a small boat like mine providing protected and productive places to fish. My business and livelihood depends heavily on my ability to fish this area. The allocation plan in proposal 70 could never work. This isnt a terminal harvest fishery like bristol bay.

Proposal 61: Oppose
Proposal 68: Oppose
Proposal 73: Support

Proposal 62: Oppose
Proposal 69: Oppose

Proposal 66: Support
Proposal 70: Oppose

Proposal 67: Oppose
Proposal 72: Support

**NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

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December 26, 2023

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: **NSRAA Support to withdraw Proposal 59 from Kodiak BOF meeting**

Dear Chair John Wood and Board of Fisheries Members,

I am the General Manager of The Northern Southeast Regional Aquaculture Association, or better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement projects. My comments represent our 25-member board, and the fishermen they represent, made up of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and interested persons from our region. Our board has broad representation from our region and at our Fall November 9th, 2023, meeting our board passed a **unanimous** resolution, with no abstentions, **strongly opposing** proposal **59**. Since that time proposal **59** has been withdrawn from consideration at the Kodiak Meeting.

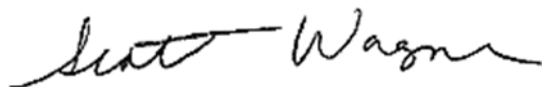
NSRAA supports the BOF action at the LCI meeting in withdrawing Proposal 59 from future board consideration. This proposal was significantly modified from the original proposer submission which greatly expanded the impact of the proposal to a specific facility, to hatchery programs statewide. Prior to the LCI meeting Proposal 59 was listed on the Kodiak BOF meeting page as a Statewide proposal. Since the LCI meeting the proposal has been re-edited and is no longer listed as a Statewide proposal.

Proposals nearly identical to Proposal 59 have been submitted 7 times over the years by the same proposers. These similar proposals have been submitted in regions spanning from Southeast to Prince William Sound, to Lower Cook Inlet. None of these proposals have been acted upon by the BOF.

Proposal **59** in its original form, or current posted version, is punitive in nature and does not attempt to address **any** allocation issue in the Kodiak area. The proposal, whether intentional or not, would have tremendous financial impacts for the Kodiak Regional Aquaculture Association, the hatchery operator of the Kitoi Bay Hatchery. These impacts would be felt by commercial, sport, subsistence, and personal use fishermen of the region. The result would be in a reduction and likely elimination of most enhanced salmon production in the area.

Once again thank you for the opportunity to comment and thank you for the work you do on behalf of the subsistence, sport, personal use, and commercial fisheries of the state.

Sincerely,



Scott Wagner
General Manager

Northwest Setnetters Association Supports Proposal #62 – Additional Fishing Time for Setnetters

Proposal 62 adds additional (front-end) fishing time for set gillnetters in the Central Section. West side set gillnets may only operate in the Central Section while other gear types have over 50 other Sections available to them at various times. Under current regulation, when the Central Section opens, all gear types open at the same time and for the same length of time alongside each other.

Setnet operations have tried to modify their operations to become more efficient in recent years. Many sites have invested in various sizes of web and reduced mesh sizes down to 4-3/8" gear, at different times of the season, attempting to catch smaller fish. We have increased pressure washing activities to keep gear clean and are utilizing single filament web to combat algal blooms. All of these attempts have not proven to turn set gillnet harvest numbers around to historical percentages; rather, percentages have continued to decline.

Meanwhile, other gear types are increasingly more efficient. Their harvest capabilities are quicker, vessels are more capable of continued fishing in bad weather, and capacity is expanding to continuous harvest during open periods, all of which diminish opportunity for fixed gear types.

Set gillnetters need a regulatory change to help the historic gillnet fleet survive. Given our fixed gear structure and singular area, additional time in the water without competing gear types is the best means to regain some of what we have lost, to continue to be viable, and to be able to hire, retain and pay crew at a fair wage.

To arrive at the 48-hour additional fishing time for this proposal, members of the NWSA took an average of their first day's delivery on each opening for the past 5 years, and looked at what additional time would be required to raise our harvest closer to historical levels of equity. Using this method, 48 hours would get us closer to our historic levels, but still not actually regain all that we have lost.

Northwest Setnetters Association Supports Proposal #64 – Modified Setnet Hook

Northwest Setnetters Association Proposal #64 is a small gear modification to Kodiak set nets. The intent of Proposal #64 is to increase the efficiency of the Kodiak set net. It does not change the length of the set net but only increases the number of fathoms used for the hook configuration. The hook of a Kodiak set net is traditionally at the offshore end of the set net and is shaped to turn fish around and gather them until they get caught in the net. Proposal #64 is requesting that the amount of set net web presently allowed to be used for the hook configuration be increased from 25 fathoms to 50 fathoms.

Each Kodiak set net permit allows 150 fathoms of set net web with up to 50 fathoms of non-fishing lead web from low tide of the day to enable a set net to get away from surf, rocks and obstructions on the immediate shore where a set begins or is attached. Several of you present Board members were able to see Kodiak set nets when you flew over the West side of Kodiak last June.

Kodiak set netters are attempting through Proposal #64, as well as our other proposals, to increase our failing share of harvest. We believe this change in allowable numbers of fathoms used in the hook configuration could be helpful. Last Board of Fish cycle we successfully passed the usage of monofilament in our set nets. That has been helpful to some set netters but has not made a meaningful increase in efficiency. Proposal #64 would also make a small increase in efficiency without being a significant change in the fishery.

Northwest Setnetters Association Supports Proposal #70 - Allocation

1. The problem that Proposal #70 addresses. The percentage of the sockeye salmon harvested by Kodiak's West side setnetters has fallen from an average of 55% in the years 1990-2012 to 33% in the years 2013-2023. The

percentage of pink salmon harvested by West side setnetters has declined from an average of 30% in the years 1990-2012, to 17% in the years 2013-2023. The rate of decline has increased dramatically in the last 5 years. This lost setnet catch share of both species is now caught by the seine fleet, a slow but steady de-facto allocation of salmon from one gear group to another.

2. Result of lost catch share for setnetters. This loss of catch percentage by West side setnetters has translated to a precipitous loss of income. This has made it increasingly difficult to gear up for a four-month season, or to find crewmembers willing to fish for increasingly low earnings. If this loss of catch share is not reversed and restored to previous equitable levels, the number of setnetters who can operate profitably will continue to fall and the demise of Kodiak's westside set gillnet fishery will be assured.

3. Possible causes of the problem. By regulation since the 1970s, Kodiak's West side set gillnetters may fish only in the Central Section of the Northwest Kodiak District, a mixed gear area where setnetters and seiners fish simultaneously during openings. Seiners may fish in areas north and south of the Central Section, in the Central Section, and in seine-only terminal areas after the fish pass through the Central Section.

Despite this inequity in fishing area, the percentages of fish caught by seiners and setnetters remained relatively static for decades after Limited Entry in 1974. Since 2012 however, the percentages of fish caught by setnetters has fallen dramatically. If allowed to continue, this accelerating trend spells the end of Kodiak's West side setnet fishery.

We believe the de-facto allocation of fish since 1990 from setnetters to seiners since is caused by various things:

1. Increased seine fishing efficiency.
2. Changing fish migration patterns, which may be causing a redistribution of salmon by gear type.

4. How an allocation of salmon would address the problem. Proposal 70 would allow managers to use separate time and area openings for seiners and setnetters to aim for historic catch percentages between the two gear groups, while also managing for escapement. An allocation plan would work best if catches and allocation targets were tracked on a daily basis, together with escapement goals. This has been successfully accomplished in other areas of the state with mixed gear fisheries. If one management method failed to reach allocation goals, another could be tried, until the most useful tools, either singly or in concert, are identified and used in the years going forward.

An allocative plan would use the West side Management Plan, which since the 1990s has comprehensively managed salmon in the mixed gear Central Section, the seine only terminal areas of the Northwest Kodiak District, the seine only Inner and Outer Karluk sections of the Southwest Kodiak District, and the seine only Telrod Cove Special Harvest Area. If all these areas managed with the West side Management Plan are not included in an allocation plan, it is likely that the percentage of fish caught by West side setnetters will continue to fall.

5. BOF Authority to Use Allocation to Address the Problem. The Board of Fish has the authority to allocate fish in Alaska between gear groups using historical, cultural, and economic criteria. Kodiak's West side setnet salmon fishery is historically, culturally, and economically valuable to Kodiak and the State. We therefore believe it is appropriate and necessary for the Board of Fish to allocate Kodiak's West side salmon in order to restore the historic percentages of catch share between seiners and setnetters, and thereby ensure the survival of the setnet fishery.

Northwest Setnetters Association Supports Proposal #71 – Allows More Flexibility in Outer Karluk Early Run Sockeye Management.

Proposal 71 provides better flexibility to the Department of Fish & Game to manage early run sockeye returning to the Karluk River and reduces the risk of over harvesting during weak returns. By allowing the Department to keep the Outer Karluk section closed when managing for Central Section openings, this proposal also provides needed relief to chinook salmon upon entering the near terminus waters during peak run timing of mid-June through mid-July.

Northwest Setnetters Association Opposes Proposals 66, 72, 73 and 74 – All of these Proposals would decrease setnet fishing opportunities in the Central Section of the Northwest District.

Proposal 74 would divide the Central Section into three separately managed sections, each of which could be opened or closed depending on escapement to local rivers. This scheme would divide the West side setnet fleet into three separate management areas and concentrate the seine fleet in those sections that might remain open, while keeping setnetters shut down in those areas that remained closed.

Proposals 72 & 73 would increase seine fishing on the West side of Afognak and at the Sturgeon River, thereby cutting off fish traveling from the north and south to setnetters in the Central Section. These two proposals could also impact escapement numbers, which could result in reduced Central Section fishing time in August.

Proposal 66 would allow the currently allowed 50 fathoms of seven-inch seine lead mesh to be hung with three and a half inch mesh. Seinners maintain this would provide a cheaper web option and would only minimally increase seine efficiency. However, this modification would extend the currently allowed 200 fathoms of 3 ½ inch seine mesh to 250 fathoms, thereby reducing the number of fish available to setnet fishermen fishing behind those seine nets.

Thank you for your time and consideration.

Respectfully,

Northwest Setnetters Association Board of Directors

Dear Board of Fish Members,

My name is Erik OBrien, Uyak Bay, Kodiak Setnetter, resident of Larsen Bay, and author of Proposal 69 (5-2 Setnet Periods)

69 proposed a 5-2 setnet fishing schedule for the Westside Setnet fleet and received broad support, although it possessed a detrimental error in that it required the Department to allocate fishing days, which is not their burden. This error can be corrected by **identifying a “benchmark” which anchors a setnet “goal” to in-season harvest**. If setnetters traditionally harvested 50% of the westside sockeye and 30% of westside pinks, that could trigger additional days to the Westside setnet fleet, up to a weekly 5-2 schedule. A percentage of the benchmark could be set, such that 70% of the benchmark would allow up to 5 fishing days per week, 80% - 4 days per week, 90% - 3 days per week, etc. These numbers would need to be developed in partnership with the Department to ensure the protection of escapement goals. A scenario that could trigger this would be sockeye traveling up the southwest end of the Island or small pinks, both scenarios that limit the ability of the Setnet fleet to harvest the *benchmark* allocation. In this case, the **Department would follow the benchmark goals to trigger additional setnet days while also managing the seine fleet for maximum harvest to ensure escapement goals**.

In conversations with several members of the seine fleet, we discussed an appropriate start date for this proposal. After thinking about this in concert with those seiners, **a more effective period for the 5-2 trigger would be the July 4 -August 24 mixed stock management periods**. The majority of that time is already managed on a weekly schedule.

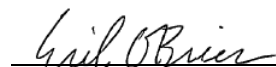
A fair mechanism to trigger additional setnet days without limiting the seine fleet is the most important issue facing the Kodiak Setnet fishery.

Proposal 64, allowing larger hooks, is probably one of the most important gear modifications we can make to improve efficiency. This proposal received very little to no opposition, and I hope you will pass this attempt to affect our own ability to improve harvest efficiency without affecting adjacent gear types.

Proposal 63, allowing permit stacking, would allow increased operational efficiency, although some members are philosophically opposed to this proposal; however, looking at the dynamics, it is the family operations that would most benefit from this change. I support family fishing operations and support this proposal.

Thank you for your consideration.

Sincerely,



Erik OBrien



David O'Brien

[REDACTED]
Kodiak AK
[REDACTED]

12/23/23

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

RE: Proposals 63 and 64

Dear Chairman Wood and Board of Fish members:

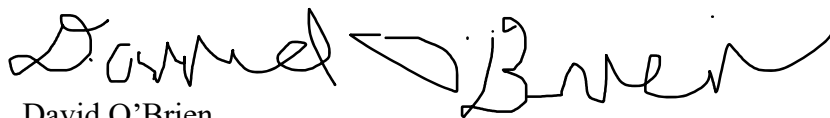
Thank you for the opportunity to comment on proposals for the upcoming Kodiak Board of Fish meeting. My name is David O'Brien, and I am a new entrant into the Kodiak seine fishery as I bought a seiner in 2020 and fish Kodiak after going to Bristol Bay during June and the first part of July. I am writing in **support of proposals 63 and 64** and in **opposition** of proposal **62 and 70**.

Proposals 63 and 64 are a great example of proposals by the set net fleet that directly advocate for the setnet fishery, while providing no direct negative impact to the seine fleet. These proposals will undoubtedly allow more harvest for the setnet fleet without directing management time or area away from the seine fleet.

Proposals 62 and 70 are concerning as they are based on the premise that seiners are the reason for the decline in setnet harvest, which is not factual. Fishing days matter to seiners the same as they matter to the setnet fleet, especially in a fishery like the Kodiak fishery where we scratch away at multiple species during a comparatively long season. I am not in favor of losing fishing days after investing a substantial amount of savings into the fishery. There also is no guarantee that any fish allocated away from seiners will actually be harvested by the setnet fleet potentially leading to lost opportunity and over escapement.

In conclusion I urge the Board to be cautious making changes to the Westside Management plan without fully comprehending the impacts they could have on sustainability and yield.

Sincerely,



David O'Brien



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:
OSM 23143

DEC 22 2023

John Wood, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Wood:

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the 31 proposals being considered at the Alaska Board of Fisheries Kodiak Finfish meeting January 9-12, 2024. The attached comments from OSM regard proposals that are likely to impact federally qualified subsistence users or associated fisheries resources within Federal subsistence management jurisdiction. Other proposals being considered may affect Federal subsistence fisheries and users. Most of these other proposals involve fisheries that are outside of Federal jurisdiction and some of them involve areas of overlapping State and Federal jurisdiction. Adoption of these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. OSM may wish to comment during the meeting on other items that impact federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director

Enclosure

cc: Federal Subsistence Board
Interagency Staff Committee
Benjamin Mulligan, Alaska Department of Fish and Game
Art Nelson, Alaska Department of Fish and Game
Mark Burch, Alaska Department of Fish and Game
Administrative Record

RECOMMENDATIONS

ALASKA BOARD OF FISHERIES PROPOSALS

**Kodiak Finfish
January 9–12, 2024
Kodiak, Alaska**

Office of Subsistence Management (OSM)

PROPOSALS 44 and 45

5 AAC 64.030. Methods, means, and general provisions – Finfish.

Proposal 44: Prohibit multiple hooks in Kodiak Island freshwaters as follows: In all freshwaters of Kodiak Island only a single hook may be used for sportfishing.

Proposal 45: Prohibit bait and multiple hooks in Kodiak Island freshwaters as follows: In all freshwaters of Kodiak Island only single hook artificial flies or lures may be used for sportfishing.

Current Federal Regulations:

50 CFR §100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions

* * *

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a “barb” means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

* * *

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

* * *

50 CFR §100.27 Subsistence taking of fish.

* * *

(b) Methods, means, and general restrictions – Subsistence taking of fish

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

* * *

(xix) A rod and reel; and

* * *

50 CFR §100.27(e)(9) Subsistence taking of fish. Kodiak Area

* * *

(vii) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.

(viii) You may take salmon only by gillnet, rod and reel, or seine.

* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Adopting these proposals may increase the number of fish available for federally qualified subsistence users.

Federal Position/Recommended Action: OSM supports Proposals 44 and 45.

Rationale: Prohibiting multiple hooks and bait in the sport fishery is likely to reduce release mortality of incidentally caught non-target fish. Reducing all mortality sources for stocks that have failed to steadily meet escapement goals (Ayakulik and Karluk rivers Chinook Salmon) may be warranted.

PROPOSAL 46

5 AAC 64.030. Methods, means, and general provisions – Finfish.

Allow snagging as a legal method for Sockeye Salmon in Kodiak Island freshwaters as follows:

Sockeye Salmon may be legally harvested while hooked anywhere in the body in Kodiak Island freshwaters.

Current Federal Regulations:

50 CFR §100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions

* * *

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a “barb” means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

* * *

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

* * *

Snagging means hooking or attempting to hook a fish elsewhere than in the mouth.

* * *

50 CFR §100.27 Subsistence taking of fish.

* * *

(b) Methods, means, and general restrictions – Subsistence taking of fish

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

* * *

(xix) A rod and reel; and

* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Unknown

Federal Position/Recommended Action: OSM is neutral Proposal 46.

Rationale: Allowing the retention of foul hooked Sockeye Salmon is likely to decrease incidental mortality from the requirement to release fish hooked in areas other than the mouth. If this proposal is adopted, non-target species could be impacted or mortally wounded. Snagging currently is not allowed in the Kodiak Area under Federal subsistence fishing regulation. If this proposal were adopted, a similar proposal would likely be submitted during the subsequent Federal fisheries regulatory cycle.

If the Board of Fisheries chooses to authorize snagging in freshwaters of Kodiak Island, OSM recommends prohibiting snagging in waterbodies when stocks are not meeting their escapement objectives.

PROPOSAL 49

5 AAC 64.060. Kodiak Area Salt Water King Salmon Sport Fishery Management Plan.

Modify the Kodiak Area Salt Water King Salmon Sport Fishery Management Plan as follows:

(4) the bag and possession limit for king salmon is two fish, with no size limit **except for May 15-July 31 when bag and possession limit for king salmon is one fish, with no size limit;**

(5) **For summer fisheries (April 1-August 31): 20 inches or longer: There is a combined annual catch limit of 5 King salmon 20 inches or longer. A king salmon of 20 inches or longer that is removed from salt water must be retained and becomes a part of the bag limit for of the person who originally hooked the fish. You must not remove a King salmon of 20 inches or longer from the water before releasing it.**

Current Federal Regulations:

50 CFR §100.27(e)(9) Subsistence taking of fish. Kodiak Area

* * *

(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(A) In the Federal public waters of Kodiak Island, east of the line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within 1 mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Adopting this proposal may increase the number of Chinook Salmon available for escapement and for harvest by federally qualified subsistence users in Federal marine waters in the Kodiak Area.

Federal Position/Recommended Action: OSM supports Proposal 49.

Rationale: Lowering the Chinook Salmon sport limit in the Kodiak Area salt waters may result in more Chinook Salmon available for escapement and for harvest by federally qualified subsistence users. Although stock compositions of the Chinook Salmon harvested in the Kodiak Area marine sport fisheries indicate the majority of salmon harvested are not bound for Kodiak watersheds, the recent status of the Chinook Salmon stocks are not considered strong or healthy. Actions to reduce mortality on Chinook Salmon is currently warranted during this time of statewide low abundance.

PROPOSAL 51

5 AAC 64.XXX. New Section.

Prohibit commercial transporters from sport or subsistence shellfish fishing while transporting clients as follows: No commercial transport vessel may conduct saltwater sportfishing or subsistence crab fishing while in the act of transporting nature viewers or hunters on Kodiak Island or its near shore waters.

Current Federal Regulations:

50 CFR §100.3 Applicability and Scope.

* * *

(b) The regulations contained in this part apply on all public lands, including all inland waters, both navigable and non-navigable, within and adjacent to the exterior boundaries of the following areas, and on the marine waters as identified in the following areas:

(1) Alaska Maritime National Wildlife Refuge, including the:

(i) Karluk Subunit: All of the submerged land and water of the Pacific Ocean (Sheliokof Strait) extending 3,000 feet from the shoreline between a point on the spit at the meander corner common to Sections 35 and 36 of Township 30 South, Range 33 West, and a point approximately 1 1/4 miles east of Rocky Point within Section 14 of Township 29 South, Range 31, West, Seward Meridian as described in Public Land Order 128, dated June 19, 1943;

(ii) Womens Bay Subunit: Womens Bay, Gibson Cove, portions of St. Paul Harbor and Chiniak Bay: All of the submerged land and water as described in Public Land Order 1182, dated July 7, 1955 (U.S. Survey 21539);

(iii) Afognak Island Subunit: All submerged lands and waters of the Pacific Ocean lying within 3 miles of the shoreline as described in Proclamation No. 39, dated December 24, 1892;

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Adopting this proposal would not affect federally qualified subsistence users' ability to participate in the Federal subsistence fisheries of the Kodiak Management Area and would limit non-federally qualified users' take of fish and shellfish from Federal public waters.

Federal Position/Recommended Action: OSM supports Proposal 51.

Rationale: Adopting this proposal may result in more fish and shellfish resources available for federally qualified subsistence users fishing in Federal public waters. Many of the shellfish resources in waters under federal subsistence fisheries jurisdiction are severely depressed, substantially restricted, or closed to take by non-federally qualified users.

PROPOSAL 58

5 AAC 01.525. Waters closed to subsistence fishing.

Establish waters closed to subsistence fishing for salmon outside the mouths of Danger and Cold creeks as follows:

From a marker at 58 degrees 12.4 minutes North to the eastern island and from a marker at approximately 58 degrees 34.4 minutes North to the western island.

Current Federal Regulations:

50 CFR §100.3 Applicability and Scope.

* * *

(b) The regulations contained in this part apply on all public lands, including all inland waters, both navigable and non-navigable, within and adjacent to the exterior boundaries of the following areas, and on the marine waters as identified in the following areas:

(1) Alaska Maritime National Wildlife Refuge, including the:

(i) Karluk Subunit: All of the submerged land and water of the Pacific Ocean (Sheliokof Strait) extending 3,000 feet from the shoreline between a point on the spit at the meander corner common to Sections 35 and 36 of Township 30 South, Range 33 West, and a point approximately 1 1/4 miles east of Rocky Point within Section 14 of Township 29 South, Range 31, West, Seward Meridian as described in Public Land Order 128, dated June 19, 1943;

(ii) Womens Bay Subunit: Womens Bay, Gibson Cove, portions of St. Paul Harbor and Chiniak Bay: All of the submerged land and water as described in Public Land Order 1182, dated July 7, 1955 (U.S. Survey 21539);

(iii) Afognak Island Subunit: All submerged lands and waters of the Pacific Ocean lying within 3 miles of the shoreline as described in Proclamation No. 39, dated December 24, 1892;

* * *

50 CFR §100.27(e)(9) Subsistence taking of fish. Kodiak Area

* * *

(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(A) In the Federal public waters of Kodiak Island, east of the line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within 1 mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

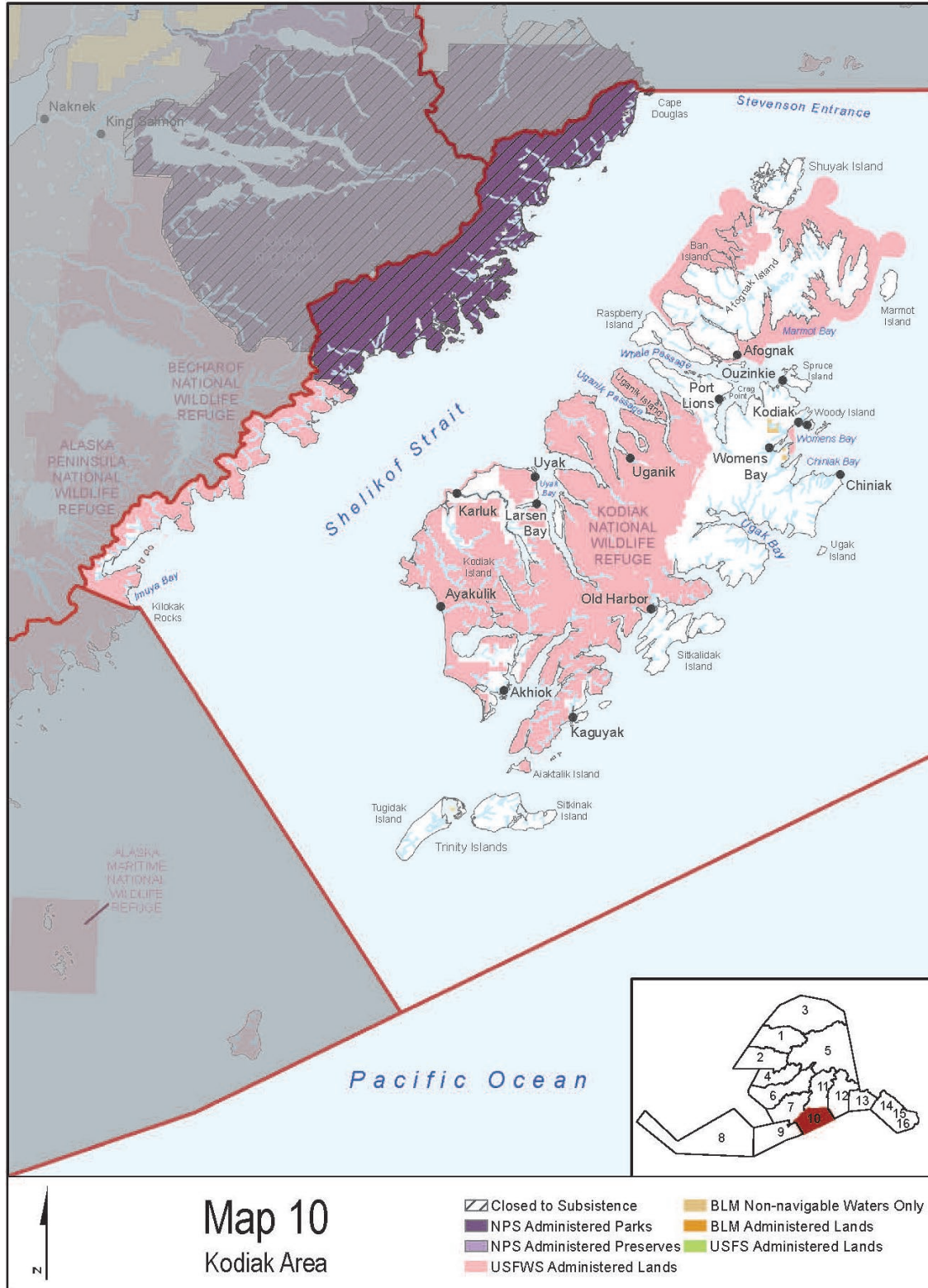
* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Residents of the Kodiak Island Borough, except those residing on the Kodiak Coast Guard Base, have a customary and traditional use determination for salmon in this area. This proposal would exclude non-federally qualified users from fishing in this area but would not apply to Federal fisheries occurring in the same area (see attached map). Adopting the proposal may increase the number of fish available to federally qualified subsistence users fishing under Federal regulation in this location.

Federal Position/Recommended Action: OSM is neutral on Proposal 58.

Rationale: Adopting this proposal would provide a preference for federally qualified subsistence users to harvest salmon in this location. However, OSM is unsure if there is a substantial enough conservation concern to warrant a closure.



Map 1. Kodiak Area including the Federal marine waters of Womens Bay, Karluk, and Afognak subunits.

Dan Ogg
[REDACTED]
Kodiak, Alaska [REDACTED]

Dear Board of Fish Members,

My name is Dan Ogg. My wife, Susan Jeffrey, and I each own a Kodiak Island salmon set net permit and we run our family set net fish camp. We have lived in Kodiak for half a century. Our Family has fished salmon since 1987. 2024 will be our 38th year. Our fish camp is in the Central Section of the North West District of the Kodiak Salmon Management Area.

The Central Section is the only section managed for and fished by the seine fleet and the set net fleet simultaneously. In addition, the small Alitak District is an exclusive set net district located 80 miles to the south of the Central Section. Except for these two sections the remainder of the Kodiak Salmon Management Area is exclusively for the seine fleet. The Kodiak Salmon Management Area is 13% larger than the state of Massachusetts.

The Central Section is currently 100% allocated on a catch as catch can basis. Therefore, any proposal that changes the Time, Area or Gear in favor of one gear type will decrease the catch as catch can traditional share of the other gear type.

Setnetters in the Central Section of the Northwest Kodiak District have been losing their Traditional harvest percentage to the point where the fishery is in danger of not being viable anymore.

- 1. I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Setnetters Association. These proposals aim to reverse that trend.**
- 2. I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the set net fleet.**

Thank you for your consideration.

Sincerely,

Dan Ogg



PC121

Submitted by: Maria Painter

Community of Residence: Kodiak

Comment:

I am opposed to proposal 57

The Kodiak Food and Bait Herring Fishery has been Limited Entry for over 20 years and I think it should stay that way.

Proposal 57: Oppose



PC122

Submitted by: Ron Painter

Community of Residence: Kodiak, AK

Comment:

I am opposed to Proposal 57. I don't want to see the rights of existing stakeholders in the fisheries be diminished by others that have sold their rights to participate in the fishery.

Proposal 57: Oppose



PC123

Submitted by: Marko Patitucci

Community of Residence: Kodiak Alaska

Comment:

I'm oppose proposals 62. I am a second generation commercial fisherman. I believe taking away time from the seine fleet for the set net fleet is wrong . Also it will not benefit the salmon run, it will only be detrimental to the salmon run. Robbing another fishery for your gain is the not right way. Please do not pass this proposal. I depend on the few each hour and day so much as it is. It is already so hard to have a decent season as it is. This is not good for the kodiak community as a whole. This is not good for for fishing family's as a whole. Thank you.

I support proposal 56, please make it possible for the fall herring fishery to be open to the sac roe herring permits. It is not right that a fishery is only open to a a few permits. It has been monopolized by one family because of this. Sam Much said in his own words that there is no money in the fishery. If that the case why not give other chances to fisherman to make new markets and opportunities. 20 years from now I don't want to look back and see nothing has changed. This is an amazing natural resource they should not be only for a select few.

With the fishing industry so volatile we need more opportunities to have a chance to not thrive but survive. We are just looking wanting a chance to participate in this natural resource.

I support proposal 66, eliminating the 50 fathoms of lead web so we could have full body web. Eliminating lead web will not increase our catch rate at all, however it will help us save money. Every few years many seiners replace their body web however the lead web does not get replaced, it is not as important but when you do have to replace it it is close to \$4k. If we were aloud to have all body web then we could reuse our body old web instead of buying new leads. This would be very beneficial to new young fishermen. There are pallets of free older body web all around town that would work great for that section of the net. This is a gear enhancement not a catch enhancement. Also means les web goes to the landfill.

Proposal 57: Support

Proposal 62: Oppose

Proposal 63: Oppose

Proposal 64: Oppose

Proposal 65: Oppose

Proposal 66: Support

Proposal 67: Oppose

Proposal 68: Oppose

Proposal 69: Oppose

Proposal 70: Oppose



PC124

Submitted by: Michael Patitucci

Community of Residence: Kodiak

Comment:

I have been saining in Kodiak for 47 years. I support proposal 57, I have always wanted to get into the fall herring food/bait fishery, however I have found it to be impossible to buy into the fishery. From what I have found all the seine permits are owned by one family but one. When I asked to buy that one permit I was told that he had to sell it to the family that owned the rest. This natural resource has been monopolized for too long. If this continues it is a shame and a bad example how we manage our precious fisheries. Opening it up to the sac roe permits will give opportunities to many fishermen and crew to build something special. I support 66. eliminating lead web. It is a gear advancement not a catch advancement. It well help my operation be more affordable to operate on these narrow margins because I have a lot more 3 and a half inch web laying around.

Proposal 57: Support

Proposal 63: Oppose

Proposal 64: Oppose

Proposal 65: Oppose

Proposal 66: Support

I am opposing proposal 62, I have been salmon saining in Kodiak Island for 47 years. Owner operator of the F/V Morning Star, long time Kodiak resident and this proposal will be detrimental to my operation. The 57 hours which are hardly enough hours as it is pay for fuel, insurance, food. Why are we getting penalized for the lack of effort the gillnetters show on the west side. The lack participation on major producing set net sites all over the the west side have been abandon. Why are we getting punished for there lack of effort. This proposal would be extremally bad economically for the Kodiak community.

Proposal 62: Oppose



Submitted by: Susan Payne

Community of Residence: Kodiak

Comment:

Dear Members of the Board of Fisheries,

As a set gillnet permit holder in Viekoda Bay, Kodiak Island Management Area, Central Section, I write to support the NW Setnet proposals which seek a solution to a diminishing share of the Westside salmon catch. The NW Setnet group met for a year in an attempt to draft proposals that would help our sector without impacting current fishing for the other groups.

There has been a reallocation over the years and these proposals work to reverse that trend.

Proposal 70 is the goal towards equity. Proposals 64, 62, and 69 are the possible tools that management could utilize to achieve the goal.

Proposal 71 is important because it eliminates the mandate for management to open the Outer Karluk section. Often, the Central Section, the only section the NW setnetters are allowed to fish, are held back from fishing in order to meet the "midpoint of the Karluk escapement range" only to have the Outer Karluk section open to seiners. All "shall" mandates throughout the Kodiak Management Plan should be changed to "may" in order to give management greater control over escapement and catch.

Proposal 64 allows the setnet fleet a tool to catch fish during the slime events.

I oppose Proposals 66, 72, 73 and 74 which would further impact the fish reaching the Central Section and the setnet area. Proposal 74 is disturbing because it is described to you as a conservation measure. ADFG Management already has the tools they need in the NW District to conserve specific bay returns. They can differentially close individual inner bays and alternatively close the entire Central Section while keeping inner bays open. This is why the Kodiak Management Plan was designed as it is.

I very much OPPOSE Permit Stacking, Proposal 63 !!! This does not solve the diminishing share/return to the setnet fleet. This proposal is an opportunistic move to benefit existing setnetters at the detriment of future entrants into the fishery. There was no mention of this proposal at NW Setnet meetings that I attended and the Board should not see this as a common goal of that group. We successfully defeated permit stacking in Kodiak previously. If by some chance you approve this proposal please put limits on the number of sets/amount of net one person can have, similar to the use of D permits in Bristol Bay.

We have fished our site since 2002 with our family. In that time, we have seen a dramatic decrease in our catches. We do not hire crew anymore because it is sad asking crew to work for an entire summer for a wage less than what they could make at McDonalds. Help us draft a workable plan.

Respectfully,

Susan Payne

PO Box [REDACTED]

Kodiak, AK [REDACTED]

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



Submitted by: Eduardo Perez

Community of Residence: Kodiak alaska

Comment:

Proposal 53- i am a small boat operation put of kodiak that participates in the pot cod fishery if this proposal passes to allow the use of slinky pots there needs to be a limited entry based on fishing history or we will have a huge amount of new participants for example the small boat longline fleet. The more boats the less fishing time and money

Proposal 53: Support With Amendments

December 23, 2023

Board of Fisheries Comments

Proposal 63- *Oppose* – Allow permit stacking in the Kodiak set gillnet salmon fishery

Proposal 64 – *Support* – Modify set gillnet operations to increase the allowable size of the hook

Proposal 54 – *Oppose* – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

Proposal 55 – *Support* – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

Proposal 57 – *Support* – Modify herring purse seine gear, fishing season and periods, and herring sac roe harvest strategy to increase commercial harvest

To Chairman Wood and members of the Board of Fisheries,

My name is Theresa Peterson and my family and I have lived and fished out of Kodiak for over 35 years. We own a 42' fishing vessel with our son who runs the boat for salmon seining. In addition, we own and operate a salmon gillnet site with two permits in the South end district of Kodiak Island

Proposal 63- *Oppose* – Allow permit stacking in the Kodiak set gillnet salmon fishery

I acquired my limited entry permit in 2011, after the ability to own and operate two setnet permits sunsetted in 2010 in response community concerns. The opportunity for me to buy in came as a result of the sunset provision. The person who owned the Kodiak setnet permit and had stacked it in a family members name while pursuing fishing opportunity in Bristol Bay had to divest.

Many people would clearly benefit from the opportunity to extract income from one salmon region while fishing in another as permit stacking allows. Others seek to protect assets and would like the flexibility and convenience to own and operate two permits when fish site dynamics change such as family members moving on to other professions. Others would like to expand their operations beyond the limitations of one

permit per person. That aspect is rarely mentioned in public testimony but could certainly be an outcome of permit stacking.

It is critical that the Board clearly recognizes the implications of permit stacking, including the negative impacts of consolidation in a fishery with no demonstrated need. I understand the economic stress participants in the salmon fishery are under but this action is not the solution. The short-term gains do not warrant restructuring the Kodiak setnet fishery.

There is not an excess of latent permits or a study quantifying a measurable need. If this fishery is consolidated in response to current participants interests without an optimum permit study, nor any other criteria provided in the rationale for the legislation action which allowed for permit stacking, where does it end? Is the Kodiak seine fishery next as proposed a few cycles ago? Or the Kodiak Tanner crab fishery which is doing well? Both of these fisheries have quite a few latent permits.

We believe the limited entry system to be an ideal model to manage fisheries in promoting active participation through owner on board requirements. The permit system represents the backbone of a fisheries management policy which supports coastal communities found throughout Alaska. The system provides sufficient entry level opportunity, protected by the State of Alaska Constitution, in providing the maximum number of permits determined appropriate for each limited fishery. It is a system that has proven to work well and thorough review should be conducted for each fishery prior to implementing a significant change in the fishery.

Proposal 63, the ability to own and operate 2 setnet permits represents a significant change in the fishery and should not be considered further without an optimum permit study. Prior to allowing permit stacking in the Kodiak Island set net fishery there is a need to establish policy guidelines to determine social, economic and conservation goals of the action.

The legislative action, HB251, which allowed for permit stacking in the Bristol Bay drift net fishery, was brought forth during years of economic distress due to low salmon prices and geared to consolidate a large number of unused permits.

The legislative language stating the intent of allowing the board of fish to stack permits cites the following:

Reduce the amount of gear in the water and therefore reduce competition, consolidate the fishery, reduce the number of latent permits, avoid permit buybacks, avoid surges of

latent permits coming back into the fishery – none of these issues exist in the Kodiak setnet fishery.

In Bristol Bay the objective was to remove latent permits from the fishery using the funds of its participants. To provide incentive to purchase an additional permit, Board of Fisheries action adopted a regulation that allowed two individual permit holders to fish on the same vessel and their combined operation was allowed to fish an extra 50 fathom of net. This action was adopted with clear objectives and determined as necessary in the Bristol Bay fishery after an optimum permit study was conducted. No such objectives or optimum permit study exist for the Kodiak setnet fishery.

We encourage Board of Fisheries members to read the [CFEC report on Kodiak setnet permit stacking](#) to better understand the background of this controversial action. Please take note of Table 6 and the incremental increase of stacking in the 3 years it was allowed and Table 7 and the corresponding decline of new entrants during this same period. This data establishes a clear trend of what we would expect to see continue.

The interest to allow permit stacking in the Kodiak setnet fishery has come before the board three times now and supporters cited the need to stack permits to stay viable. In this context it is important to consider RC 2 and ADF&G staff comments found on page 75: *In the time since the permit stacking regulation sunset, the number of set gillnet permits with records of deliveries has remained relatively constant (Table 63-1) and the average exvessel value per set gillnet permit has also remained relatively constant although no adjustment has been made for inflation.*

I recognize that these are challenging times for the salmon fisheries throughout the state, however, permit stacking in a fishery with no demonstrated need is not the fix. As the board considers a suite of controversial proposals, permit stacking in the setnet fishery should not be used as a negotiation tool among salmon gear types.

Please consider the following points against proposal 63:

- A 50% potential ownership reduction represents a significant shift in the fully utilized setnet fishery. Without a thorough analysis and clear policy direction, this action is nothing more than a convenience.
- There is **no observed excess of harvesting capacity** in this fishery.
- The State, through CFEC regulations, **demand**s active participation of permit holders and prohibits absenteeism, but makes allowances for these in cases of hardship through emergency transfers.

- When consolidating a fishery, we must take into consideration the requirements of Alaska’s constitution. Particularly Article VIII Section 15: ***“A limited entry system should impinge as little as possible on the open fishery clauses consistent with the constitutional purposes of Limited Entry”.***
- Dual permits disadvantage the single permit holder and will put pressure on the single permit holder to acquire another to stay ‘whole’.
- Dual permits may enable Kodiak setnet participants to engage in other salmon fisheries and other occupations. This circumvents the current regulation which states that salmon permit holders may only participate in one salmon fishery as a permit holder in any given year.
- The proposal primarily benefits those who currently hold limited entry permits and will **consolidate ownership** of the limited entry permits, thereby **reducing future opportunity for others**.
- Permit stacking will exacerbate the challenges found in small rural communities around Kodiak to acquire limited entry permits.

It is a privilege to participate in the limited entry fisheries in Alaska and there is a balance to provide economic opportunity for those engaged in the fishery while providing opportunity for those who want a chance to put their boots on and go fishing. Before disrupting a functioning fishery, which allows for maximum participation, conduct the studies to illustrate why the action is needed.

The Kodiak setnet fisheries play a crucial role in the economy of Alaska. Entry-level opportunities in the salmon setnet fisheries help support the vitality of coastal and rural communities in the Kodiak Island Archipelago. By providing jobs and economic activity, these opportunities contribute to the overall well-being of these communities.

Opportunities in the Kodiak setnet fishery are important for the economic, social, cultural fabric of the region. They provide avenues for employment, skill development, and cultural preservation while contributing to the sustainability of the fishery and the well-being of local communities.

These relationships are well understood and numerous studies document the value of maintaining opportunity to access fisheries to support fishing communities. Please see below for more information:

- A 2017 press release highlights the report “[Turning the Tide](#)” which offers solutions to Alaska’s “graying of the fleet” problem and loss of access by rural communities to the state's fishing industry.
- News can be found in the 2016 stories “[Aging workforce poses challenge to Alaska fishing’s future](#)”

Proposal 64 – Support – Modify set gillnet operations to increase the allowable size of the hook

This proposal is intended to provide additional harvest opportunity in struggling setnet fisheries by increasing efficiencies in the gear. It is an incremental shift that may increase harvest in a sector that has been experiencing a decline in historical harvest percentages. It may benefit current participants as well as new participants without impacting other user groups or new entrants.

Proposal 54 – Oppose – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

The current spring rollover regulation was adopted by the board during the last cycle in January 2020 and is working as intended. Proposal 54 seeks to establish an allocative threshold that will result in jig rollover to the pot sector most years as demonstrated. This outcome is shown in data presented in RC2, ADF&G staff comments, on pages 40 and 41, tables 54-1 and 54-2, which show the rollover will be triggered in years that the jig fleet successfully harvested their GHG allocation. The proposal is a fish grab from an important entry level opportunity fishery. Pot vessels have the opportunity to enter the slower paced jig fishery after the fast paced pot fishery closes.

Proposal 55 – Support – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

Proposal 55 was submitted by the Alaska Jig Association and is intended to further strengthen the rollover provisions with a percentage threshold triggered on March 25th.

Entry level opportunities allow individuals, particularly those from local communities, to gain experience and contribute to the economic growth of the region. The jig fishery serves as a gateway for individuals to enter the commercial fishing industry. The fishery role provides valuable training and hands on experience in fishing techniques, gear handling, safety protocol and industry specific knowledge.

The jig fishermen have worked in good faith to provide rollover opportunity earlier in the season when the conditions are not favorable to harvest the GHL for the jig sector. In an attempt to address management concerns with ambiguity in determining factors to rollover the quota the fleet is willing to apply a reasonable threshold to trigger the rollover. In addition, the jig fleet recognizes the wording may in the proposal would benefit from additional clarity and is supportive in changing 'may' to 'shall' where deemed appropriate.

Proposal 57 – Support – Modify herring purse seine gear, fishing season and periods, and herring sac roe harvest strategy to increase commercial harvest

Herring is a valuable resource to the marine ecosystem and it managed under conservative harvest amounts. Use of herring as a food product should be encouraged in management, particularly when new markets open up. In addition, local bait can be of great value to community-based fishermen, both for their own use and entrepreneurial opportunities to market bait to other fishermen. The proposal seeks to increase opportunity for those interested in pursuing and developing markets while not taking away from the few existing food and bait permit holders. There could be opportunity for the underutilized gillnet permits to develop markets in the food and bait fishery to make it once again a viable option in a diversified fishing portfolio.

Thank you for your careful consideration of this issue and we look forward to discussing the matter further during your visit to Kodiak.

Sincerely,

Theresa Peterson



Submitted by: Jane Petrich

Community of Residence: KODIAK. ALASKA

Comment:

December 26, 2024

Dear Board of Fish Members,

Hello! My name is Jane Petrich and I have made my home in Kodiak and Larsen Bay (village on the west side of Kodiak Island) since 1971. I have been a set net permit holder and fished the west side of the Island since 1978. My three (now adult) children spent every summer of their lives into adulthood in the Kodiak set net fishery. My daughters in law and oldest granddaughter hold set net permits and all 3 of my grandchildren spend their summers at our fish site. Set netting has been a corner stone of my family's life for 45 years but that has changed in recent years due to the decline in profitability in the setnet fishery. Last season only one of my sons fished our sites and with all the uncertainty in the fishery and our declining catches we may not be able to afford to fish in coming seasons.

We need your help to save this historic fishery. I hope you are listening.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association and proposals 63 and 69, submitted by individual permit holders. 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.

Proposal 62 attempts to give the set net fleet more time in the water without the presence of the increasingly efficient seine fleet.

Proposal 64 is a change to how we configure our gear with no increase in fathoms fished.

Proposal 70 provides allocative per centages that would return the set net fleet to historic catch levels. Management would have the flexibility to implement strategies to achieve this percentage.

Proposal 71 is a wording change (shall to may) in regulation that shifts some of the burden of conservation off the shoulders of the set net fleet.

Proposal 63 allows one person to hold and fish two set net permits. This is simply a tool most needed by family operations to more smoothly manage multiple permits. This is primarily opposed on a philosophical level by people who feel it will restrict new participants entry into the set net fishery. This is one minor administrative change that could keep family operations in business. Shouldn't I have as much right to pass a permit on to me grandchildren as to provide a permit to newcomer into the fishery?

Proposal 69 is another proposal for giving the set net fleet an opportunity to fish without competition from the increasingly efficient seine fleet.

I am 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.

Proposals 72 and 73 chip away at the fish passing through areas bordering the only area open to the set net fleet and could reduce numbers of fish reaching Karluk – resulting in lower escapement levels and shutting down fishing in the Central District.

Proposal 74 is particularly egregious. It is packaged as a conservation measure and puts the burden of conservation on the shoulders of the set net fleet. It divides the set net fleet, closing Bays in which they are established and requiring them to stop fishing. Seiners would simply move to the next Bay over and continue fishing. Setnetters in the closed Bay cannot move and would lose fishing opportunity. This would also concentrate seiners on top of Setnetters in open area and further reduce Setnetters opportunity.

Again, I hope you are listening! I have heard multiple times during my preparation for the upcoming BOF meetings that Seiners and Setnetters should be meeting to work out their differences. Society does not expect divorcing couples to resolve conflicts or feuding property owners to equitably divide property without mediation. Fishery user groups should not be expected to resolve their conflicts. It is the responsibility of the members of the Board of Fisheries as stated in Alaska Statute.

“The Board of Fisheries (BOF) is responsible for considering and adopting regulations to allocate resources between user groups; ... AS 16.05.251

Thank you for your consideration.

Sincerely,

Jane Petrich

Proposal 62: Support

Proposal 63: Support

Proposal 64: Support

Proposal 66: Oppose

Proposal 69: Support

Proposal 70: Support

Proposal 71: Support

Proposal 72: Oppose

Proposal 73: Oppose

Proposal 74: Oppose

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing to with respect to **proposal 63**. Because this proposal deals exclusively with the setnet fishery without imposing any operational restrictions on the seine fleet I am **neutral** on this proposal. However, in addition to the socio-economic impacts within the setnet fleet, I would like the board to acknowledge and understand that passage of this proposal *will* result in higher utilization of available setnet permits and will raise the aggregate harvest for their gear type, therefore there are allocative implications that should be considered with this proposal. Again, I have no opposition to this approach to improving their fishery, and I fundamentally support the setnet fleet pursuing solutions that do not impose restrictions on other user groups.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in regards to **Proposal 64**. I am neutral on this proposal and generally support setnet fishermen pursuing improvements to their fishery without imposing restrictions on other user groups. I would, however, like the board to acknowledge and explore that improving the harvest effectiveness of the setnet gear type has both conservation and allocative impacts and would ask the board to consider the totality of those impacts for both near and long-term considerations.

Darren Platt

FV Agnes Sabine

Kodiak, AK

I am writing in **opposition to proposal 61** which sets an unrealistic minimum escapement threshold for coho long before the peak of the run and would prefer the harvest of pink salmon returning to this system. The department already manages responsibly for coho escapement based on scientific standards and their policies shouldn't be overrun by the arbitrary and capricious imposition of minimum escapement thresholds that don't even correlate with the run timing of the species they are designed to protect.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **opposition to proposals 67 and 68**. While I consider it important for the board to address escapement goals for critical salmon systems, it is imperative that these goals have a sound scientific basis and account for the needs of all user groups. The Ayakulik and Karluk are already managed very conservatively for coho, and these arbitrary escapement thresholds would be imposed long before most of these fish show up, essentially preventing the Department from balancing management needs for other species. The Karluk would especially be imperiled by proposal 68, as the seine fleet would be deprived of substantial harvest opportunity and this system would suffer from chronic over escapement which would assuredly collapse the sockeye fishery. Please oppose these proposals.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing to **oppose proposal 65**, which, if implemented would prohibit the use of aircraft to locate salmon for the purpose of commercial harvest. This proposal is problematic in its assumptions, proposed implementation, and in the inevitable unintended consequences.

First and foremost, this rule has proven to be entirely unenforceable elsewhere in the state. There are no statutes forbidding private airplanes from flying over salmon systems and observing fish and no laws forbidding pilots and passengers of these planes from discussing their observations with members of the public. It would be impossible for the Alaska State Troopers to prove or determine the intentions of all bush pilots in the Kodiak area, or to regulate any contracts privately made between pilots and fishermen. The adoption of this regulation would inevitably result fishermen and pilots utilizing loopholes that evade the intention of the rule, giving an even greater advantage to those operators who do not wish to follow the spirit of the regulation.

The Kodiak Management Area is a large regulatory region with hundreds of salmon streams that are remotely located and chronically underutilized due the costs and difficulties of traveling long distances to find fish. The use of pilots in Kodiak doesn't imperil our salmon populations – it simply allows fishermen to harvest surplus fish that wouldn't otherwise be caught and prevents those fishermen from traveling to and operating in areas of low abundance, therefore contributing to the conservation of stocks.

The assertion that “the use of aircraft to locate salmon benefits a small portion of the Kodiak salmon fleet and diminishes opportunity for other members of the fleet” is generally untrue. Every seiner in Kodiak has the right to hire a pilot, if they so desire, so it is not a privilege granted to a select few. Additionally, pilots are typically used to find fish in areas where other fishermen aren't operating, so their implementation eases competitive pressure and reduces focused fishing effort, therefore benefitting everyone engaged in the fishery. It is generally desirable to spread out the fleet in this way to maximize yield and reduce focused fishing effort. In fact, the fishermen who employ pilots are typically the most skilled and productive in the fleet, and so the use of pilots to displace these fishermen to otherwise unfished areas results in a substantial positive impact on the harvest volumes of less competitive operators.

Among the most impactful of the unintended consequences of this proposal would be that it would erode the department's ability to manage the fishery for escapement. Only a handful of salmon systems in Kodiak are equipped with weirs, and so aerial surveys of river systems to gauge escapement is

the *only* means local managers have to determine run strength and manage the fishery. Recent budget shortfalls have resulted in early removal of weirs and fewer aerial surveys. Privately hired pilots in recent years have been able make up for much of the budget deficiencies by allowing area biologists to join their flights in order to survey escapement conditions, thereby benefitting *all* of Kodiak's fishermen. Without these flights, the department would lack the necessary to data to properly manage the fishery. Fishing opportunity has already been regularly curtailed due to lack of ariel survey data, and so fishermen could expect in fewer harvest opportunities if proposal 65 were adopted.

Finally, Kodiak's salmon fleet is the economic engine of this community as shoreside businesses rely on income from fishermen. The net impact from implementation of this proposal would be an economic loss for Kodiak beyond just the reduced harvests for our fishermen – it would put more townsfolk, especially the pilots themselves and their employees, out of business. I ask the board to please consider the totality of impacts that would result from the implementation of proposal 65 and reject this proposal.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **opposition to proposal 69** as written. While I appreciate the intention of the proposer in trying to provide fishing opportunity for setnet fishermen without imposing any restrictions on the seine fleet, this proposal doesn't properly account for the conservation needs of the Northwest district. While the proposer suggests that the department may curtail the mandatory openings when there is a conservation concern, this would be tantamount to asking the department to make subjective in-season allocative decisions. The department cannot simply select a single gear type to restrict for conservation purposes without explicit guidance that is not provided in the proposal. The West Side is best managed with openings and closures to both gear types simultaneously to allow for the safe passage of fish when needed, fairly distribute the burden of conservation, and assure that conservation decisions aren't strictly allocative.

Darren Platt
FV Agnes Sabine
Kodiak, AK
12/26/2023

John Wood
Chairman
Alaska Board of Fisheries
Street Address
City, ST ZIP Code

I am writing in **support of proposal 57** which would change the harvest dates for G01K and G34K herring permits. The adoption of this proposal would correct the shortsighted error of forcing fishermen and processors to utilize herring during a short time-frame in order to maximize the production of single product type. The current regulatory structure prevents the state from obtaining the full economic potential of this fishery and has resulted in the wasteful overproduction of sac-roe products and more recently, the underutilization of an abundant resource.

The board should be aware that this proposal does *not* allocate more fish to G01K and G34K permit holders, instead, it grants them more *time* to harvest their already extent allocation in order to optimize utilization according to actual market and product demands. Currently, this fishery season is temporally managed according to the most arbitrary reference point of any fishery in the state – herring quotas are required to be harvested to maximize the production of a product type dedicated to feed the market of a single foreign nation 35 years ago. This is an irrational bench mark to base a modern fishery management plan and proposal 57 provides the board with a remedy to correct this oversight from decades ago.

Arguments that this management change would intrude on the historical access rights of the single vessel currently operating under an H1DK permit are unfounded. The allocation granted to the individual controlling all of the H1DK permits would go unaffected, and he would be allowed access to the same biomass and quota available under the current regulatory protocol. In fact, transferring portions of the G01K/G34K quota to the fall period would provide more biomass for the single H1DK operator by limiting herring harvest in the spring. The primary concern however, isn't actually for the competition for access to fish, it is instead for market competition of the finished product. It would be an unprecedented action for the board to make a decision in order to protect a user group from such market competition. There is no regulation, policy or statute that requires or even authorizes the Alaska Board of Fisheries to protect the market share of a processed product type for any user group. In fact, any such action taken by the board that is designed to hinder the execution of a competitive and efficient market for our

fishery products would necessarily inhibit the use of the resource to the maximum benefit of the people without any conservation benefits either economic, ecological or otherwise. The Alaska Board of Fisheries is not intended to regulate the processing of fish beyond providing harvesters a regulatory structure that ensures processors are afforded the greatest capacity to maximize the value of the resource.

Kodiak in particular is the optimal location to begin the transition out of the current antiquated regulatory herring structure. 20% exploitation rates of herring biomass are accepted to be a sufficiently conservative level of exploitation in order to sustain the resource, and quotas in Sitka and Togiak are set at this level. Not Kodiak. Our spring herring quota is set at an ultra-conservative 10% of estimated biomass, and the fall H1DK quota is set at 1% for an aggregate 11% total exploitation, well below accepted sustainable levels. This extraordinarily large conservation buffer provides more than enough protection to assuage any concerns on how changed harvest patterns could impact the resource.

Historically the department's policy has been to require H1DK permit holders to form a combine in order to assure that the 1% allocation isn't exceeded. This makes sense since such a low quota level means that harvesters engaged in a competitive fishery could easily exceed their allocation. This requirement hasn't been re-examined in recent years as every permit has been aggregated onto a single boat, eliminating the potential for a competitive fishery. The allocation into the B-season of a minimum of 1,000 tons of quota for G01K/G34K permit holders would still allow for the department to set requirements for participating fishermen to register to an area, report all harvest immediately, form a combine or other cooperative agreement, or impose other such restrictions such as forbidding the use of tender vessels. Modern communication has eliminated many prior concerns of overexploitation, as currently G01K/G34K permit holders report *every set* they land immediately to the department so that minute-by-minute in-season management has allowed for an orderly and sustainable sac-roe fishery. If fishermen can do this in the spring, they can assuredly do it in the fall and the department would maintain the right to close the fishery due to conservation concerns even if the quota weren't caught.

Proposal 57 clearly provides a greater opportunity for Kodiak's fishermen and processors to optimize harvest timing in order to properly supply a global market that is vastly different from when the management structure was first implemented. It would also allow Kodiak's fishermen to harvest and potentially sell their own bait, as well as supply the other processors with herring that they couldn't obtain it before. The current single harvester/single processor monopolization of the fall fishery has created market inefficiencies that negatively impact Kodiak's crab, cod, halibut, and sablefish fishermen who have endured years of hyperinflated bait prices caused by monopolized control of the resource. So, in addition to allowing fishermen and processors to better explore and exploit global food herring markets,

John Wood
12/26/2023
Page 3

proposal 57 would have the added benefit of lowering operating costs for many Kodiak fishermen, a desperately needed respite from the current level of inflation.

It's time for Alaska to reimagine our herring fisheries. Let Kodiak be the new management standard for sustainability and market efficiency. Proposal 57 is the right change in order better manage and steward our herring resources.

Darren Platt

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 66** which would eliminate the requirement that our nets include a 50-fathom section of 7" leadweb. I am a bay-fisherman and spend as much time as possible in the crows nest where I am able to observe fish swimming in the net. In my 14 seasons running the boat I have only witnessed salmon swim through leadweb twice, for a grand total of about 20 fish out of millions harvested. I personally will not remove my leadweb because it is much easier to repair when torn; however, I would appreciate how it would simplify the annual net building process by not requiring that leadweb begin exactly after 200 fathoms. This change wouldn't substantially impact the harvest ability of seiners, but would improve the financial efficiency of our operations by simplifying the net building process. Given the current state of salmon markets coupled with the rapid inflation of operating costs this proposal would at least provide some improvement economics of our fishery.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 71**. I would first like to address the allocative implications of this proposal. By eliminating some of the historically applied openings of the Outer Karluk Section in concurrence with the Central Section, this proposal will result in a re-allocation of sockeye to setnet fishermen. When the department decides to close the Outer Karluk Section as provided for in this proposal, then Karluk sockeye harvest would largely be concentrated in the Central Section where setnetters catch a majority of these fish. While managing for escapement this would allow for longer central section openings in the absence of fishing opportunity at Outer Karluk, which in turn would provide more fishing time and higher harvests for setnet fishermen, and less overall harvest for seiners.

This proposal does, however, have merit based on its conservation value. The Department should have the flexibility to close the Outer Karluk section as needed in order to conserve sockeye, pink salmon, and chinook returning to the Karluk system, and this proposal provides them with better tools to conserve those stocks while providing for sufficient harvest opportunity elsewhere.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 72**. Historically the Southwest Afognak Section has opened with Central Section for pink salmon harvest opportunity. When the board amended the West Side Management plan in 2020 to include option for the Department to open the Central Section in order to provide harvest opportunity for Karluk pink salmon, they should have included this section in order sustain historical seine harvest patterns and fishing opportunities. This proposal would allow, but not require, the Department to allow concurrent fishing time in the SW Afognak Section.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 73**. There is no justification for neglecting to account for pink salmon escapement in the Sturgeon River when managing the Sturgeon Section. This is an obvious oversight given that the Sturgeon River can produce over a million pink salmon and is one of the most productive pink systems on the island. This proposal would give the Department the ability to conserve pink salmon when stocks are weak and also to provide harvest opportunity when stocks are strong. There is not another district in Kodiak for which the management plan takes no consideration of the major salmon systems within the district.

While I understand that the department has concerns for sockeye salmon, and I am sure the proposer will correct those concerns, the board should understand that peak pink salmon productivity for the Sturgeon River is in late July and Early August, over a month before the historical peak of the late Karluk sockeye run, and so effort in this area during peak humpy productivity is likely to have very limited if any impact on Karluk sockeye stocks. Later in August, however, management of the Sturgeon section should absolutely account for late-run Karluk sockeye and hopefully the proposer amends the proposal to rectify those concerns.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 74**. I understand that this proposal is unpopular amongst both gear types because of the potential to restrict harvest opportunity in areas where they may fish, and I hope the Board does consider the short-term collateral impacts from this proposal that would result from fundamentally altering the way the Northwest district is managed, however, I believe that the conservation benefits of this proposal by far outweigh the short-term concerns of the public. Ultimately, the central section is too large and is managed too aggressively to adequately conserve fish.

This proposal would allow the Department to more incisively apply openings and closures within this area in order to provide opportunity on strong stocks while protecting weaker stocks. The Department *does* have the ability to close the seine-only inner bay sections, but unfortunately, setnet harvest effort does not respond to the abundance of nearby salmon systems, and so whenever any or all of the local sockeye, pink, and chum systems are weak there is a latent baseline level of effort imposed by the setnet fleet that will be applied to those stocks inhibiting them from achieving escapement goals and hindering their current restoration to historical levels of productivity.

Consider this scenario: Spiridon, Zachar and Uyak, and Kizhuyak systems are exceptionally strong, while Uganik and Terror are not. Traditionally, the department would open the central section along with the Spiridon, Zachar, Uyak, and Kizhuyak sections while leaving the Inner Uganik and Terror Bay sections closed. If Uganik and Terror are still exhibiting poor escapement, even with the inner bays closed, then the department is left with the option of leaving the central section open in order to provide opportunity on the stronger stocks to the south and east while overharvesting Terror and Uganik fish, or closing the entire area and forsaking harvest opportunity on the stronger stocks in order achieve better escapement to in Terror and Uganik Bays. If this proposal were adopted then it would eliminate the dilemma by allowing the Department, in this scenario, to impose a potentially brief closure in the Outer Uganik Section while leaving the other sections of the Northwest District open, thereby optimization *both* conservation and harvest opportunity instead of having to choose between the two.

This proposal still allows the Department to continue to rely primarily on selective Inner Bay closures, but the gauntlet of setnets that these fish have to pass in order to reach their natal streams is still often more effort than weaker systems can or should support. In fact, Inner Bay closures often to don't provide substantial additional conservation benefits, since seiners will not focus their efforts on weak stocks when more abundant stocks are available. Adoption of the proposal would result in better conservation in the Northwest District and more salmon for everyone to harvest and is the best choice for the long-term productivity of Kodiak's salmon fishery.



December 26, 2023

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

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC Supports Board of Fisheries Decision to Withdraw Proposal 59

Chairman John Wood and Alaska Board of Fisheries Members,

The Prince William Sound Aquaculture Corporation (PWSAC) supports the Board of Fisheries decision at the Lower Cook Inlet meeting to withdraw Proposal 59 from consideration at the Kodiak Finfish meeting. After careful and thorough, processed discussion, the board recognized the problems with regulation as the proposal was drafted as well as vague and confusing proposal language.

Additionally, proposals nearly identical to Proposal 59 have been seen by the board approximately 7 times since 2003. Hatchery associations, ADF&G staff, and Board of Fish members have spent considerable time and money addressing this repeat proposal. With unsubstantiated claims, each time the board has rejected the proposal. There is no scientific research consensus that suggests these repeat proposals would help the intended stakeholders. There is ongoing field research from NOAA Alaska Fisheries Science Center and ADF&G Salmon Ocean Ecology Program that suggests marine heatwave events may have played a key role in juvenile chum salmon survival. What remains clear is that a proposal such as 59 would bring harm to fishermen's small businesses, families, sport, subsistence, and personal use programs across large regions of Alaska.

Sincerely,



Geoff Clark
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES
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PC132

Submitted by: Afanasy Reutov

Community of Residence: HOMER

Comment:

Hi I'm a jigger I vote no for pot taking jigging quota

Proposal 54: Oppose Proposal 55: Support



PC133

Submitted by: Avraamy Reutov

Community of Residence: Homer, Alaska

Comment:

I'm a jigger and I don't agree with proposal 54.

Proposal 54: Oppose Proposal 55: Support



PC134

Submitted by: David Reutov

Community of Residence: Homer

Comment:

I am a long time jigger and I do not agree on sharing quota with pot boats

They already have much more quota it just not fair

Proposal 45: Oppose Proposal 55: Support



PC135

Submitted by: Evsevy Reutov

Community of Residence: Homer

Comment:

I'm a jig fisherman we need all the quota we could get

Proposal 54: Oppose Proposal 55: Support



PC136

Submitted by: Julian Reutov

Community of Residence: Homer, alaska

Comment:

I support proposal 55. I oppose on proposal 54. I go commercial jigging fishing in Kodiak and proposal 54 will really effect our jigging fleet. only start fishing around end of march due to weather. And if the 50% of the quota rolls over to the pot guys there will be nothing left for the jig fleet. A lot of us depend on this quota to support our families.

Proposal 54: Oppose

Proposal 55: Support



PC137

Submitted by: Mavrik Reutov

Community of Residence: Homer,ak

Comment:

Like keep it as is please

Proposal 54: Oppose

Proposal 55: Support



PC138

Submitted by: Timon Reutov

Community of Residence: Homer

Comment:

I vote no for 54 and yes for 55....I do not want pot boats to take the jig quota.

Proposal 54: Oppose

Proposal 55: Support



PC139

Submitted by: Andrey Reutov

Community of Residence: Homer AK

Comment:

Hi all, been fishing jig and long line cod for 12+ years, and i strongly oppose proposal 54 cause i believe the small guys deserve a chance... and everyone knows jig boats season only starts mid March.. so this proposal doesn't make any sense... and i would also like to vote in favor of proposal 55, it helps out the little guys.. and in these pressing times small guys deserve a chance.. thank you

Proposal 54: Oppose Proposal 55: Support



PC140

Submitted by: Samuil Reutov

Community of Residence: Homer Alaska

Comment:

I'm voting against daggers and pot boat's

Proposal 52: Support Proposal 53: Support Proposal 54: Oppose Proposal 55: Support



PC141

Submitted by: Vavil Reutov

Community of Residence: HOMER ak

Comment:

We can't let them take jig qouta there qouta is already big ,jiggers should be taking qouta from pot boats

Proposal 54: Oppose Proposal 55: Support



Submitted by: Sidney Richey Paulukaitis

Community of Residence: Hudson Oaks, Texas

Comment:

Dear Board of Fish Members,

I have fished in Larsen Bay. Kodiak holds a near and dear place in my heart. I have many friends who setnet in these bays.

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,

Sidney Richey Paulukaitis

Proposal 62: Support

Proposal 64: Support

Proposal 66: Oppose

Proposal 70: Support

Proposal 71: Support

Proposal 72: Oppose

Proposal 73: Oppose

Proposal 74: Oppose



Submitted by: Danielle Ringer

Community of Residence: Kodiak, AK

Comment:

RE: Strong Opposition to Kodiak Finfish Proposal #'s 62, 65, 67, 68, 69, and 70; Support of Proposal #'s 60, 66, 72, 73, 74.

Chairman Wood and Board of Fisheries Members,

My name is Danielle Ringer. I'm an Alaskan resident from Homer and have lived in Kodiak for going on 14 years where I work as a fisheries anthropologist studying fisheries access and well-being and own and operate a small-scale fishing vessel with my husband, born and raised in Kodiak. Fishing, and particularly salmon seining, are central to our livelihood and cultural identity and we are in it for the long haul. I ask you to please read comments, listen to testimony, and base your decisions off what you believe to be best for our fishing communities in the Kodiak region for generations to come.

I strongly oppose proposals 62, 65, 67, 68, 69, and 70.

The arguments in many of these proposals are using misleading data to portray an inaccurate story that setnet fishermen are facing challenges caused by seine fishermen instead of the numerous other issues that have

changed the setnet situation. Some of these include algal slime that can render their nets unfishable, fewer number of setnet permits holder participating in the fishery overall and not fishing for the entire season, and ecological shifts, such as migration, size, and abundance changes. Unfortunately, much of the justifications you'll read and hear in these proposals have employed cherry picked data to craft a grossly misleading argument placing seine families in their crosshairs.

Seiners have incredibly high overhead and operating costs compared to setnet sites due to vessel mortgages, continual maintenance, insurance, moorage, and fuel. Many family seine operations are having a hard time making ends meet with the current crushing financial situation of rising costs and falling fish prices. I oppose proposals to change our management plan to further restrict seiners when we are already conservatively regulated by our local ADF&G managers or seek to allocate fish between diverse gears and operations that were never meant to be the same by virtue of their many differences. This would lead not only to irreversible community rifts, but also increased travel time and lost opportunity that would raise operating costs for an already struggling fleet on top of economic and safety ramifications. Our regional community relies on salmon in many ways and these proposals would result in fewer landings snowballing lower fish tax and available work at local fish processing companies coupled with ecological impacts of overescapement in vital salmon systems around the archipelago. We cannot afford that.

All fishermen are struggling right now. We are facing unprecedented times of global market disruptions, geopolitical unrest, increasing inflation affecting operating costs and borrowing ability, and overall, an incredible amount of stress about the viability of our livelihoods moving forward. These proposals are not only inaccurately blaming one gear type for another's situation, but they come at a time when Kodiak needs solidarity and community support more than anything to get through these really difficult times. I am personally highly disappointed that such self-serving, damaging, and short-sighted proposals would be submitted that focus on pointing fingers and asking to hurt others rather than coming up with creative fixes to complicated problems that we're all facing.

I support proposals 60, 66, 72, 73, and 74 because I am interested in innovative tweaks to help my fellow community fishing families succeed while being ecologically sustainable and socially acceptable.

Thank you for your time as I know you have many comments to read. As you prepare to visit our region, please think on the incredible power that you have to impact our lives and the amount of stress that we have going into this cycle after a really challenging salmon season and right before a precarious Tanner crab fishery. I look forward to hearing from other community members and speaking with you during our upcoming meeting in Kodiak.

Wishing you a happy and healthy New Year!

Danielle Ringer, F/V North Star

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 74: Support

Proposal 66: Support
Proposal 70: Oppose



Submitted by: Michelle Rittenhouse

Community of Residence: Kodiak, AK

Comment:

December 21, 2023

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, AK 99811-5526

RE: Proposal #62, Proposal #70

Greetings Chairman Moriskey and Board of Fish members:

Thank you for the opportunity to comment in advance of the Board meeting in January of 2024. I respectfully request that you oppose Proposal #62 and Proposal #70.

For three generations my family has called the west side of Kodiak Island home. Our livelihood has been shaped around the management structure of our salmon fishery. We have been fishing in the Northwest and Central Districts for 70 years. I have been a commercial fisherman for 30 years, and as a younger generation owner and captain of a salmon seine operation, Proposal #62 and #70 would be a death blow to the future of my business and the proper management and sustainability of Kodiak's salmon fishery as a whole.

The supporting science of these proposals is biased and it fails to encompass a wide range of preexisting conditions and factors presented by nature. These would include shifting weather patterns and ocean temperatures; higher sea lion populations raiding fishing gear; salmon migration patterns; the "brown slime" that coats nets in the water; etc. The pressures and strains the passing of these regulations could potentially create are unknown. It is absolutely not worth risking the stability of our tried-and-true management plan for the short-sighted benefits these measures may or may not produce for the set gillnet fleet. Taking away mine and hundreds of other families' right to go fishing as we have always known in no way guarantees an improved advantage for the setnetters over the elements of nature or the behavior of the salmon.

These proposals would be a catastrophe for young business owners such as myself, the seining fleet, and the local economy at large. Both would cripple efforts to manage Kodiak's salmon seasons as well as they have been for many generations. I would like to see our salmon fishery remain stable and sustainable for countless ages to come.

Thank you for your time and consideration. It is greatly appreciated.

Sincerely,

Michelle Rittenhouse

F/V Pamela Dawn

Kodiak Seiners Association (KSA) member

Proposal 62: Oppose

Proposal 70: Oppose



Submitted by: Shawna Rittenhouse

Community of Residence: Kodiak, AK

Comment:

December 21, 2023

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, AK 99811-5526

RE: Proposal #62, Proposal #70

Greetings Chairman Moriskey and Board of Fish members:

Thank you for the opportunity to comment in advance of the Board meeting in January of 2024. I respectfully request that you oppose Proposal #62 and Proposal #70.

Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, local Kodiak and Homer businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADFG, the Board of Fisheries, and our state legislature.

I am in opposition to both Proposal 62 and Proposal 70, as set forth by the Northwest Setnetters Association.

My family has been involved in the Kodiak salmon fishery for 3 generations and is involved in both seine and setnet gear types. We depend on fishing for 100% of our income.

There are no guarantees that allowing setnetters to fish for 48 hours in advance of seiners would solve the problem of their declining catch. Multiple unnecessary closures would be detrimental to seiners, processors, and the local economy.

Allocating a certain percentage of the salmon run to the setnetters could create complexities within the current Management Plan that would have a detrimental effect on all gear types, Processors, and the local economy. There is no guarantee that it would solve the problem of their declining catch.

Other natural factors that are contributing to a decline in catch are an increase in the sea lion population, weather, and the 'brown slime'.

The pink runs have also changed dramatically in the past 15 years. Odd year pink salmon have changed in size and are much smaller than even year pinks. There is no gillnet web that setnetters can use to catch 5-pound reds, and 2-and-a-half-pound pinks simultaneously. The consistently mixed stock fishery of the central district would make it impossible to target each species separately for allocation. Especially for the limited amount of harvest time there is.

KSA respectfully requests the Board to reject this proposal. We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of designing regulation changes while applying the guiding BOF policies such as the Management for Mixed Stock Fisheries.

Thank you,

Shawna Rittenhouse

F/V Northern Jaeger

Proposal 62: Oppose

Proposal 70: Oppose

Dear Chairman Wood and members of the Board of Fish:

My name is Nate Rose, and I am a commercial fisherman from Kodiak. I participate in the state water Tanner crab, state water Pot Cod fishery, the jig fishery for rockfish and cod, Kodiak salmon fishery, and the federal Halibut longline fishery. I recently purchased a 56-foot fiberglass combination vessel that allows me the ability to participate in these fisheries as well as allow my family to join in our fishing pursuits.

I am writing in **support of proposals 54, 57, 60, 66, and 73.**

As one of three vessels that participated in the reopening of a portion of the jig cod quota in 2022, I can attest to the fact that the regulation change in 2020 worked as designed, and was a great success. The ambiguous language currently in place that reopens the fishery when the jig fleet is projected not to harvest the remaining quota by June 10 asks the department to look into a crystal ball and attempt to account for abundance of cod, participation by jig fishermen, and weather before making that determination. **Proposal 54** attempts to clarify the ambiguous language which would provide consistency for fishermen who participate in the pot fishery to know whether to put away pot gear or not. Ultimately, we want the full utilization of Kodiak's fishery resources and therefore unharvested quota is a valid concern.

Proposal 57 would help to alleviate the economic downturn of the commercial sac roe fishery in the Kodiak area, by allowing a portion of the sac roe quota to be rolled into a separate season in the fall when herring oil content is higher making it more desirable for food markets or bait markets. With nearly all the canned herring on the domestic market coming from Scandinavian countries, and our current local bait supply dominated by one harvester and processor, this proposal creates opportunity for expansion of herring utilization.

I ask the Board to consider supporting **proposal 60** to allow the seine fleet the ability to focus harvest effort in areas of the mainland district where pink and chum salmon returns are strong. The mainland district of Kodiak is home to very robust pink and chum salmon runs that have been largely forgotten in the board purview as a result of the focus on sockeye salmon harvest in this area, and it should be pointed out that a season is made in Kodiak by focusing on all species available to harvest. By volume, pink salmon and chum salmon make up the majority of my season in poundage, and being able to get away from the majority of the fleet allows me to capitalize when pinks and chums are abundant.

The greatest factor for my support for **proposal 66** is a cost savings. My boat is very shallow and I enjoy fishing areas where I tow my net very close to shore and every two years I must replace my lead due to the wear and tear on the "boat end" of the net. If proposal 66 were to be passed, I would be able to recycle black body web into my "lead" end of the net regardless of whether it had smaller holes in it. I have heard this proposal raises concerns about making seiners more effective because we lose fish through the 7" lead web, which is entirely false. When I am towing on my net, a 7" mesh will be pulled more into a sideways diamond with such a small opening that even the smallest of pink salmon would have a hard time squeezing through.



Proposal 73 would be a response to our most recent even year pink salmon returns to the Sturgeon River. I personally love to fish this area when it is open, as it is shallow and rocky and therefore challenging. In 2020 a large component of my pink salmon season was made by fishing this section of coast line. I think it is important for the board to realize that the time frame this proposal seeks to address is before the start of strength of the late run sockeye returning to Karluk. After speaking with department staff regarding the proposal I understand the proposal as written does not provide enough protection for late run sockeye, and hope that we can work with the Board and the department to craft language that allows for those protections while also providing seiners the ability to harvest excess pinks in this area.

Dear Chairman Wood and members of the Board of Fish:

My name is Nate Rose, and I am a commercial fisherman from Kodiak. I participate in the state water Tanner crab, state water Pot Cod fishery, the jig fishery for rockfish and cod, Kodiak salmon fishery, and the federal Halibut longline fishery. I recently purchased a 56-foot fiberglass combination vessel that allows me the ability to participate in these fisheries as well as allow my family to join in our fishing pursuits.

I am writing in **opposition of proposals 62, 65, 68, and 70.**

Proposals 62 and 70 raise the same concerns and for brevity's sake, I will write to them both. These proposals are written with the same underlying assumption that seiners are the cause of setnet productivity, and that our efforts out on the capes has lessened the viability of the setnet fleet. You will see and hear plenty of data to refute these claims, and it is important to recognize variables that have had an effect on the setnet fleet such as algae slime, increased sea lion predation, smaller fish size, and ultimately fewer fish than in the past. Please don't attempt to take action on these proposals attempting to fix a setnet's ability to catch fish, a guaranteed outcome will be a loss to seiners without a measurable gain to the setnet fleet. Our seasons in Kodiak are made by our ability to fish the entirety of the season, days matter to seiners the same as they matter to set netters, and just because we have the ability to move, doesn't mean it is always feasible to do so.

I would urge the board to oppose **Proposal 65**, as it is a targeted attempt at a very small number of seiners that utilize pilots, and will be almost unenforceable. There are only about 5 vessels that utilize pilots on a regular basis, and every one of these vessels uses a pilot to find fish where there aren't other boats as Kodiak is such a large management area. This doesn't diminish opportunity for other members of the fleet, in fact, quite the opposite. These pilots are members of our community as well, so the trickle-down effect of money generated by their services trickles back through the community.

Proposal 68 fails to recognize the current coho management plan in place for the Karluk river. Currently after September 5th, the Inner and Outer Karluk sections are managed for late run sockeye and coho returning to the Karluk River. The Department has managed these sections very conservatively for coho in recent years, while still attempting to curb the over escapement of late run Karluk sockeye. This past summer, I fished until September 27th on 54-hour weekly openers to conserve coho stocks, even though the sockeye run could have supported much more intense harvest pressure. Under this proposal, the opportunity to the fleet to participate in the inner Karluk openers for sockeye would not have occurred and the Karluk river would have experienced drastic over escapement on late run sockeye. For many, the ability to fish late this year was the deciding factor of being able to make a boat payment or not.



RE: Opposition to Kodiak Finfish Proposal #'s 62, 69, and 70.

Chairman Wood and Members of the Board of Fisheries,

My name is Steven Roth and I am the owner and operator of the fishing vessel, Sea Grace. My wife and I use a purse seine to catch salmon in the Kodiak Management Area. Every year I employ four young people during the Kodiak salmon season, and several others (all state residents) year-round working on vessel maintenance, projects, etc. We are a true Alaskan, family run, small business. I have fished in Kodiak for 40 years and hope to fish for another decade or two. My two sons, nephew, and grandson own their own fishing vessels, and another grandson owns a permit, but is saving to purchase a vessel in the future. All of them fish in Kodiak and I hope that whatever decisions are made, are forward thinking and take into consideration the viability of a fishery that is just as important to me and my family as it is to the State of Alaska, and the communities of Kodiak Island.

I do not support proposal numbers 62, 69, and 70.

Every fishery has times of famine and times of plenty, there are many variables from stock returns, weather, market, global pressures, management, mechanical, and personnel. I think it is important to not lose sight of the fact that we are running businesses that require hard work, flexibility, ingenuity, and innovation. This last season was hard for all salmon fishermen in Kodiak regardless of gear type. I think the answer is hard work and innovation in the face of temporary adversity, not taking from neighbors who are also hurting so that we can hurt less. **I would be open to answers that are innovative, not allocative.**

Kodiak is a challenging area to fish, which is why permit prices are often much lower than other areas. The Kodiak Management Area 2023 Season Summary reported that of the 371 purse seine permits, 45% were actively fishing in 2023, which is the same as the 2013-2022 average, while of the 183 set-gillnet permits in the Kodiak region, 65% were fishing, but this is 10% lower than the 2013-2022 average demonstrating there were fewer set gillnets in the water than usual resulting in lower catch numbers. While some purse seine vessels may be more efficient than in the past, there are still many smaller vessels that fish Kodiak Island and there are fewer active fishermen than when I started fishing 40 years ago. **85% of the Kodiak seine fleet permit holders reside in Alaska, while 68% of the set gillnet permit holders reside in Alaska** (current CFEC numbers). I do not think it is wrong to live in another state and fish here, but I do think it is relevant that **this decision will disproportionately impact state residents**. My family stands with our fellow Kodiak set gillnet fishermen in this difficult time, but ask that the Board of Fisheries NOT pass these proposals as they are not the answer to the current challenges we face.

Thank you for your time and careful consideration toward a better and fishier future for all of us,

Steven G. Roth, Captain, F/V Sea Grace

Greetings Chairman and Board of Fish members.

We are **ALL** hurting from the current economic situation of the fisheries.

My name is William Roth, and I own and operate the Sea Chantey. I grew up fishing in Kodiak, salmon seining since I was born. I'm married into a long time Set Net family in Cook inlet. My inlaws are the Blossoms who have homestead in the cook inlet since the 60's. Many of the board members receiving this letter probably know several of the Blossoms, as you recently supported proposals that have destroyed the fishery and several of the sights that have been up and running for over 50 years are no longer operating in the name of special interests, and have over escaped the kenai river run and hide the numbers by pulling the weir early every year. It's truly a waste of a natural resource that our state has been blessed with. If you read below your own legislation says that the purpose of the board of fisheries is as follows: "For purposes of the conservation and development of the fishery resources of the state"

It says plainly not only are you to conserve fishery and resources in the state, but you are also to develop them. *The definition of develop is as follows: grow or cause to grow and become more mature, or advance. You have failed the Cook Inlet set netters and failed to carry out the obligation you were elected to and did not conserve the fishery or develop it, instead you have caused the death of a fishery by a thousand cuts. You have allowed this by simply letting poor proposals pass that are not written using facts or biology but are simply proposed via feelings and theories.

Article 2

Sec. 16.05.221. Boards of fisheries and game.

(a) For purposes of the conservation and development of the fishery resources of the state, there is created the Board of Fisheries composed of seven members appointed by the governor, subject to confirmation by a majority of the members of the legislature in joint session.

Please consider looking carefully at the numbers presented below to see why you should **NOT** support Proposals 62, 69, or 70 and **Should Oppose** those 3 proposals.

Within the 3 proposals they state the following or similar statements:

"The percentage of sockeye salmon harvested by Westside set gillnetters out of the total of all sockeye salmon caught by all gear groups in the Northwest Kodiak District, Telrod SHA and Inner and Outer Karluk Sections of the Southwest District has declined from a 23-year average (1990-2012) of 50% to a 34% average in the years 2013-2022.

The percentage of pink salmon harvested by Westside set gillnetters out of the total of all pink salmon caught by all gear groups in the Northwest Kodiak District, Telrod SHA and Inner and Outer Karluk Sections of the Southwest Kodiak District has declined from a 23-year average (1990-2012) of 30% to 19% in the years 2013-2022."

This however is not taking into account that according to the 2015 Kodiak Management Area Season Summary released by the ADFG states that 82% of setnet permits were actively fishing. While during 2023 only 65% of setnet permits were fishing. While Seiners have had a steady percentage of permits being used at 45% of permits fished. This Shows a decrease of 17% but that's not the whole story, if you manage to understand simple math the actual percentage decrease of setnetters fishing is a 21% decrease in set netter permits fishing. So naturally we expect the set netters to catch 21% less which leaves us with the following 11% left over that the set netters have caught less. Which can simply be accounted for by a lack of effort on the outer coast where there is miles and miles of open setnet area, very little effort has been put forth to fish from miners point to chief point. The fishery has evolved in Kodiak as seiners have moved out to the capes more, rough weather and harder working conditions has been a result, in response to that the fleet has evolved and it should be no different for the setnetters. We live in a free market and the setnetters have the ability to evolve as well.

In 2023 the average boat in Kodiak grossed \$131,586 per fishing permit, the lowest since making it the 2nd lowest following 2010, the first being 2016, which the state declared an emergency disaster year.

The dollar in 2016 was worth \$1.28 today, making 2023 one of the worst years ever for the Kodiak fishery taking inflation into account. With record low prices and climbing operation expenses the average boat in Kodiak is running a fine line margin and if these proposals pass it simply would destroy the fishery for about half the Kodiak fleet.

Not only that, kodiak had strong runs in 2023 with horrible prices, the kodiak seine fleet cannot sustain itself currently at these salmon prices if additional fishing time was taken away and average or below average year happened, the state would have to declare another disaster year in order to prevent an economic disaster in the small communities of Alaska.

I know personally if these proposals pass I will be moving to a different area with more opportunity and would leave the kodiak seine industry. As vessels leave and fishermen quit due to a poorly managed fishery, you destroy jobs, income for the state of Alaska, the ADFG department, and the communities throughout the greater Kodiak area.

Letting these proposals pass would not be fulfilling your duty as a board of fish member and would be destroying a fishery instead of developing a fishery. Yet again causing a death of a thousand cuts to the commercial fishing fleet due to poor management of a resource.

Please Oppose proposals: 62, 69, and 70 to preserve an economic and a sustainable fishery that has been operating for more than 50 years.

Thank you for hearing me out.
Sincerely, William Roth



Submitted by: Bruce Schactler

Community of Residence: Kodiak, Alaska

Comment:

I am in complete support of this long needed proposal

I am also attaching my comments in a separate document.

Kodiak Alaska

Board of Fisheries

Proposal 57

The change to herring management in this Kodiak Herring proposal #57 is needed, as the sac roe market continues to decline.

Most of the allowed, biological herring harvest in Alaska will once again go unharvested in 2024 due to the failing market for 'roe herring' that has been the case for many years now.....from initial quota suggestions from ADFG, the unharvested portion will likely be over 100,000 tons! It is unclear at this time if any of the roe herring quota in Kodiak will be purchased!

To change the options and direction for such underutilized Alaska herring, management must change to allow harvest to take place when the herring are past their spawning phase, and into the high fat or better/different stage of life when the fish's nutritional profile is comparable to all other uses of this valuable State of Alaska resource!

The need to diversify and bring new value to the herring fishery cannot be understated. New Product made from herring, be it canned, pickled, or smoked requires higher fat and or better nutrition profiles. This can only be realized after the herring have been feeding for 5 or 6 months past spawning.

As you can see in the attached study of the North Atlantic herring fishery, that includes some 500K tons of herring (down to 390K for 2024), the possibilities for the market expansion of Alaska herring is clear. As a frame of reference, Norway alone exported over 70,000 tons of herring fillets in 2023, which figures back to approximately 200,000 tons of whole fish.

<https://www.alaskaseafood.org/resource/alaska-herring-market-recovery-project-report-2022/>

The 2023 average price paid to the fishermen for this fishery has been \$750 per ton.

On the Pacific side, Russia harvested a similar amount that was either consumed domestically or exported into this same world market for herring....both to Asia and Europe.

Kodiak is unique in Alaska, having generally, the right size herring and the geographical access for harvest, as the herring accumulate and school during the fall and early winter where the nutritional profile is at its peak.

For the last 40+ years, there has been a small set aside of 7-10% for "bait" in various Alaska herring fisheries, but the old roe market, SOA management and associated massive investment to produce for that market has

dominated all other aspects of the fishery. The SOA has begun to address this change in small ways, such as the removal of the word “roe” in the fishery description relative to the Togiak (Bristol Bay) fishery.....it is now, simply the Togiak herring Fishery.

This same name change is proposed here for the Kodiak herring fishery.

One may argue that there are no new markets for any form of Alaska Herring, but as I have pointed out, well over 90% of Alaska herring has been regulated for the Japanese “roe” market only. The remaining limited use has been for local bait. The vast majority of the Alaska herring fishermen have been put out of business by the crash of the Japanese roe market, stranding equipment and investment.

To create new Wild Alaska Seafood products and to expand the markets from those products, the producers must first have access to the needed raw product, which spans the entire life cycle timeline of our prolific, but now much underutilized, Herring resource.

Current management must change before new access to an expanded resource is realized.

Until the potential new producers and the associated new markets have access thru new a management scheme, there can be no realistic planning or needed investment for new products and markets.

Currently, our US domestic market has pickled herring produced with Norwegian and Canadian herring, European produced smoked and canned herring, Atlantic Coast and Russian herring for bait, as well as various kinds of “cured” herring from Canada, Iceland and Norway.

Alaska herring now has a “specification” in the USDA for potential use as a canned product in their export food aid programs.

The Alaska Seafood Marketing Institute (ASMI) is actively making markets aware of our herring resources thru domestic and international program activities, including nutritional studies showing the significant benefits of eating herring.

- 1). <https://www.alaskaseafood.org/species/herring/>
- 2). https://www.alaskaseafood.org/wp-content/uploads/210808_Blding-Evidence-Can-Herring.pdf
- 3). https://www.alaskaseafood.org/wp-content/uploads/Liberia_HerringReport_10_13_15-1.pdf
- 4). https://www.alaskaseafood.org/wp-content/uploads/210808_Uganda_1pg.pdf
- 5). https://www.alaskaseafood.org/wp-content/uploads/161020_Herring-Recipe-book-6-Final_5.5x8.5-Copy.pdf

This collection of recipes was produced from a 3 year promotion in Seattle. This promotion was titled “NW Herring Week with Alaska Herring”. Over 50 restaurants and retail outlets took part.

Additionally, the process is underway for the Responsible Fisheries Management (RFM) sustainability certification for Alaska herring which will make it the only sustainable herring fishery in the world other than an “area” portion of the Norway fishery.

This certification will put Wild Alaska Herring firmly in play as a preferred raw product for the retail markets that demand such certification.

To add further promise for Alaska Herring, I will note that the dominating herring fisheries I have referenced above are all in a period of decline and generally not classified as sustainable. (Down 24% for 2024)

Finally, the SOA Administrations, and the SOA Legislature have advocated, supported and called for change and new development of the Alaska herring fishery for the last 20 years. This support includes financing for research, development equipment and marketing.

Everything is in play and the table is set for Wild Alaska herring to realize a new place in the world market place....all that is left to realistically move forward, is access to the needed raw product, and that will happen with the passage of this proposal.

Bruce Schactler

Kodiak, Alaska



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

Proposals 62, 65, 70, 73

Dear Chairman Wood and Board of Fish members:

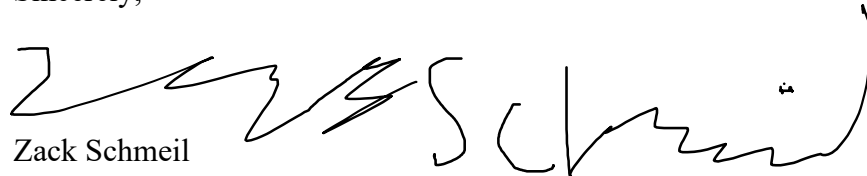
My name is Zack Schmeil and I am a commercial fisherman in Kodiak. I participate in the tanner crab, halibut, and salmon fisheries on my family's 56 foot seiner. I am writing to voice **my support for proposal 73, and my opposition to proposals 62, 65, and 70.**

I fished the Sturgeon Section in 2020 during the last week in July, and first week of August and it was at the time the best pink salmon fishing in the state. The Sturgeon River was open during that time to the river mouth as there was a surplus of pinks escaped into the river, however that section of coast line was managed based on late run sockeye and on pink salmon returning to Karluk. Proposal 73 gives the department flexibility to manage the Sturgeon section for sturgeon pinks as well as the Karluk runs. Flexibility for management is always a good thing, as it allows for maximum yield.

I oppose proposals 62 and 70, as these proposals would take away time and area from seiners and in this current economic climate these are losses we cannot afford. Proposal 70 is especially frustrating as it is founded on the idea that every fish taken away from the seine fleet will be harvested by the setnet fleet, although it should be pointed out that on year like this year, 2023, there wasn't a setnet fishing after September 7th. This proposal would simply strand fish under the allocation, leading to lost harvest opportunity and lost revenue to our community.

I sincerely hope the Board recognizes that these proposals carry heavy weight for our community, and could result in changes that could devastate our local economy. Please consider the impacts of these choices and trust the science and the department of Fish and Game recommendations regarding the sustainable management of our fishery.

Sincerely,


Zack Schmeil