



Submitted by: Quinn Haughey

Community of Residence: San Diego, California

Comment:

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Uyak bay since 1997. My family has been fishing Uyak bay since 1965.

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,

Quinn Haughey

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



Submitted by: Rebecca Haughey

Community of Residence: Uvalde, Texas

Comment:

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since 1993. I live in Uvalde, Texas in the winters. Although we migrate every year, my kids have attended the village school in Larsen Bay and spent up to six months out of the year every year in Alaska. Sometimes it feels like there is bias against me, because I am not an Alaskan resident, however, what I do bring to the table is extensive experience in agriculture in the lower 48 as a rancher, and residing in an agriculture community that also is big on hunting and tourism, as well, as an economy that heavily relies on oil. This is very similar to Alaska. What I have is a little glimpse into the future as many of the things that are occurring in Alaska now occurred in Texas 20 to 30 years ago as I was growing up. As I'm sure everyone knows, it is so much easier to write policy that affects change if it is proactive rather than reactive. We are a little late in the game on this, but it is crucial that we act now.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic

harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

The loss of harvest for my family follows the trends that have been discussed. Financially, it is devastating, and we have had to reinvent ourselves somewhat. My kids want to continue the family fishing business that has been a part of our family for three generations started by my father-in-law in 1965. The precedence has been set in other areas in the state. Alaska values set netting and small, family businesses. It is what the entire state built it's economy on before big oil came in and continues to be necessary for the state to thrive.

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. If you look historically at England, Ireland, Scandinavia, the Mediterranean, the East Coast and the West Coast of the United States as well, overfishing was preceded by technological advances in maritime industries that allowed greater harvest by single vessels. If you track the advances in the seine fleet, you will also find that it now employees fewer fishermen, and the majority of the fish is caught by a much smaller percentage of Vessels and crewmen. These advances left unchecked eventually led to overfishing and unemployment and has been seen historically in all the aforementioned places as well. It's not that we need to hang on when it's time to become obsolete, but I think there is a point where the board of fish has to decide what the priorities of the state will be. In addition, I oppose 57 as it sets a bad precedence to null and void limited entry permits that have been purchased. I support the development of food herring and see that it possibly needs to be split from bait herring to allow development, but not fished as this proposal suggests.

I completely understand and support all of the salmon fisherman. I am friends with seiners and setnetters alike. That makes the situation very difficult as we all truly want to do our jobs, and make a living and we hope that we all have success. But I strongly caution the board not to lean in the direction of big agriculture. It is devastating to small towns. I have experienced it firsthand in the lower 48. Alaska is about the only place left where small family businesses in agriculture can potentially thrive and this is being threatened by so many factors. We can't even really figure it out. Please do your best to support setnetting and make seining viable for all boatowners, not just the megaboats.

Thank you for your consideration.

Sincerely,

Rebecca Haughey

Proposal 57: Oppose
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



PC51

Submitted by: Sam Haughey

Community of Residence: Larsen Bay,AK. May - September, Uvalde,TX October - April

Comment:

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since 1965. I have spent every summer of my entire life on Kodiak Island, in Uyak Bay, at our setnet site. My children are third generation setnetters. Without your

support of proposals 62,64,70, and 71, I am afraid we will not have a viable monetary fishery to hand down to another generation. This fishery is not only about “monetary needs”. This fishery provides so much more than money. It is primarily family based, with everyone pulling their weight to bring in the season’s catch. From young children doing chores around camp and sorting salmon species into the correct totes to the older children and young adults working on solar systems and outboard motors. Set netting is not just an occupation, it’s “A Way of Life”!

Sincerely, Sam W. Haughey

SO4K 57559

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



PC52

Submitted by: Samuel Haughey

Community of Residence: Uvalde, TEXAS

Comment:

Dear Board of Fish Members,

I am a Kodiak Setnet permit holder, fishing in Larsen Bay, AK since I was born in 2006. I live in Texas in the winters and fly up every summer to work the whole set net fishing season.

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 percentaget the point where the fishery is in danger of not being viable anymore.

These proposals aim to reverse that trend.

Thank you for your consideration.

Sincerely,

Samuel Haughey Jr.

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



Submitted by: David Hilty

Community of Residence: Kodiak Alaska

Comment:

Oppose proposal 65.

Throughout the last 37 years of fish spotting in Kodiak I have seen many ebbs and flows in the Kodiak salmon fishery, from highs and lows of harvests, prices and fisherman participation.

I grew up as a young Kodiak fisherman and later changed my career path into aviation. I was able to merge both of my skills to become a fish spotter. Salmon spotting is one of very few ways that an entry level pilot can build Alaska flying time in order to enter a commercial career in aviation. Unlike herring fishing, where most fishers use a pilot, Kodiak salmon spotters are rare. The Kodiak salmon area has seen a high of maybe 5 spotter pilots and in most recent years only one, being myself and a couple of part time and private (hobby) spotters. There are very few boats that choose to use spotters in Kodiak, so the net effect on the fleet is minimal.

The Kodiak management area is comprised of hundreds, if not thousands, of miles of shoreline and hundreds of anadromous streams, along with many different salmon species, genetic stocks and run timings that span nearly 5 months. Within the Kodiak management area we have seen areas open fishing for as little as 6 hours by emergency order to as long as 90 days when the run and escapement are strong. It would be nearly impossible for a fishing vessel that travels at 8 knots to be able to compile current and relevant information needed to make decisions as where to be the most efficient during the fishing period. (should I run to the hatchery for a 6 hr opener or stay on the south end to grind away on slow but steady fishing?) That is where a spotter is able to help fishermen make a good decision to save critical fishing time or to burn \$4.50 a gallon fuel to move to better grounds. A good fish spotter is a tool used to gather information about run timing. More times than not, I am recommending that the boats do not go to a new area because the run hasn't materialized there yet or that there are already boats there. It takes many years of experience to make sound decisions to recommend a move. In my opinion, a bad fish spotter is one that looks for fishermen on capes and circles over them until they roll their fish aboard and relays the information to their boats. This is bad etiquette, unprofessional and one of the main reasons that fishermen are against spotters. I make a point of informing beginners and new spotters to the area that these actions are the best way to get spotting banned in Kodiak.

From the first of July until the middle of September I am in the air almost every day flying for my boats, or contracting with the Kodiak area fish managers to do salmon escapement counts and fishing effort surveys, or the Alaska department of game doing animal surveys. If spotting is banned in Kodiak I may be forced to justify and defend my activities to enforcement in open fishing areas where my other activities overlap. Someone may claim that I am spotting when in fact I am transitioning over open fishing grounds while doing stream surveys, or possibly flying a medi-vac.

Kodiak has been my home for over 45 years, I have a lot of relationships within the community of which I try to give back. On many occasions I have delivered parts, searched for lost skiffs and nets, performed search and rescues and flown injured people to town. Many of these situations were for people and boats that I have no financial affiliation with, its the fact that I am in the area, in the air and available to help. Because of my vast experience of the salmon runs on Kodiak, I serve on the local aquaculture association board. I also relay pertinent information to the fish managers regarding fish escapements during my daily flights without financial gain. I believe that this information is of great value to the state especially during times of budget cuts where

they can't afford as many survey flights as they would like. These services would all go away if spotting is banned in Kodiak.

In closing a spotter is just another tool to make a fisherman more efficient. No one complains when a fishing competitor gets a bigger power skiff, deeper net, secret radio, or good pair of binoculars. Everyone has the opportunity to use their tools of choice. If spotters are banned, what is next? Will there be a proposal for limiting boat or skiff horse power, banning is a slippery slope.

If you vote to pass proposal you will effectively end my 37 year career as a spotter and one who lives and gives back to our community.

Proposal 65: Oppose



PC54

Submitted by: Dennis Hintz

Community of Residence: Kodiak, AK

Comment:

I am a 47 year old father of 2, and I've been fishing in Kodiak since 1988, when I started my career as a setnetter before transitioning to seining in 1992. I currently operate the fishing vessel Cami O as a seiner in Kodiak, and earn the majority of my income from salmon fishing. I also work as a welder in the winter, and a substantial portion of my work comes from the salmon fleet. Proposals 62 and 70 would harm my business both on and off the water. Requiring 48-hour seine closures would hurt the seiners far more than it would help the setnetters, and would just mean less fish caught in Kodiak. This is a waste of the resource.

The allocation plan in proposal 72 is ridiculous. How do you allocate fish to a gear type that isn't able to catch the fish?

I also used to live in Port Lions, which is a village in the Central section. Fishermen from Port Lion spend most of their time fishing close to home, and this would have a particularly bad impact on that community.

I'm also opposed to proposals 67 and 68. These escapement goals are arbitrary, and 68 would result in over-escapement of the Karluk system and a collapse of the run.

As a welder and seiner I see how important fishing access is to the entire Kodiak economy. Please do not pass proposals that will result in overall less fishing income for our community, because that impacts everyone in Kodiak, on and off the water.

Proposal 60: Support

Proposal 62: Oppose

Proposal 67: Oppose

Proposal 68: Oppose

Proposal 70: Oppose

Proposal 72: Support

Proposal 73: Support



PC55

Submitted by: Aaron Hocum

Community of Residence: Kodiak, Alaska

Comment:

Object Proposal Number 49 - a group from outside a management area should not submit a proposal that is not based on scientific evidence. Management areas are separate for a reason, and because one area has regulations in place, it does not mean their regulations will work in another area.

Proposal 44: Oppose	Proposal 45: Oppose	Proposal 46: Support	Proposal 47: Support
Proposal 48: Support	Proposal 49: Oppose	Proposal 50: Oppose	Proposal 51: Support



PC56

Submitted by: Anders Hocum

Community of Residence: Kodiak, Alaska

Comment:

Object Proposal Number 49 - a group from outside a management area should not submit a proposal that is not based on scientific evidence.

Proposal 44: Oppose	Proposal 45: Oppose	Proposal 46: Support	Proposal 47: Support
Proposal 48: Support	Proposal 49: Oppose	Proposal 50: Oppose	Proposal 51: Support



PC57

Submitted by: Tamara Hocum

Community of Residence: Kodiak, AK

Comment:

Object Proposal Number 49 - a group from outside a management area should not submit a proposal that is not based on scientific evidence.

Proposal 44: Oppose	Proposal 45: Oppose	Proposal 46: Support	Proposal 47: Support
Proposal 48: Support	Proposal 49: Oppose	Proposal 50: Oppose	Proposal 51: Support



Submitted by: Timothy Hocum

Community of Residence: Kodiak, Alaska

Comment:

Object to proposal 49. Additionally a group from another management area should not submit proposals without scientific/biology evidence as to the benefit.

Proposal 44: Oppose
Proposal 48: Support

Proposal 45: Oppose
Proposal 49: Oppose

Proposal 46: Support
Proposal 50: Oppose

Proposal 47: Support
Proposal 51: Support



Submitted by: Nicholas Hoffman

Community of Residence: Kodiak, Alaska

Comment:

proposal 74 Support

I've been fishing Kodiak Island for many years and since about 2016 I've seen a big decrease in the amount of fish returning to the inner bays of the central section of the west side of the island. Yes, Karluk River has had some big returns but not the many other salmon streams that make up the central section. It's just too big of a section to manage and needs to be broken up into smaller sections to better manage for local stocks. I would really like to see all the streams of the west side of Kodiak full of fish again and allowing each bay to open or close based on fish returning to that bay would be a great start to rebuilding the west side streams. This proposal gives managers more options for better management on the west side of Kodiak.

Proposal 74: Support

proposal 72 and 73 Support

proposal 72 to open the SW Afognak section concurrent with the central section on even years is a good way to spread the seine fleet out by opening up more of the coast on the west side. proposal 73 is fixing a big oversight in the management plan to allow the fish returning to the Sturgeon River to be used in management decisions on opening or closing that section instead of basing everything on Karluk.

Proposal 72: Support

Proposal 73: Support

proposal 70 Oppose

Set nets and seiners are different. It's misguided to just allocate 50% to each group. This proposal is flawed in so many ways. Set nets fish farther up in bays anchored in one spot and never move and usually only go out and check their nets 2-3 times per day. By contrast seiners are out making many sets a day and if the fish slow down in an area, they will usually drive to another area to look for better fishing.

In addition, the math used here is inaccurate, they are comparing set net catch numbers in the central section with seine catch numbers all down the west side in many areas where there aren't any set nets. A 30% allocation of pinks is also ridiculous because most set nets use a larger mesh size meant for catching only large reds, pinks just swim through these nets and are not caught. I've seined Kodiak for many years and fished the central section a lot and if this proposal passes, I'm afraid it might put me out of business because there would be long closures on the west side to allow the set nets to "catch up" with their salmon catch.

Proposal 70: Oppose



Submitted by: Nicholas Hoffman

Community of Residence: Kodiak, Alaska

Comment:

proposal 69 Oppose

This proposal disregards all the longstanding science fisheries regulators have used to reach escapement goals just to keeps set nets in the water longer. Having 105 hour guaranteed openers for set nets every week even if the salmon run is looking weak or isn't meeting goals is a bad idea.

Proposal 69: Oppose

Proposal 67 & 68

Oppose

Silver salmon run later in the year than red salmon and pinks, limiting the Fish and Game managers ability to open the Inner Ayakulik and the Inner Karluk sections to harvest pinks and late run reds in August and could lead to over-escapement and underutilized fish stocks. Not allowing Fish and Game managers flexibility to open the Inner Ayakulik and Inner Karluk sections in late August to harvest surplus pinks on a year with a large run would be detrimental to the health of the fishery.

Proposal 67: Oppose

Proposal 68: Oppose

proposal 66 Support

Kodiak is the last place in the state to use "Leads" or 7" web on the last 50 fathoms of the seine net. This is a relic of the past when leads were removable and there were worries of creek robbing this is no longer an issue. allowing seines to be made of the same web for the whole length makes it easier to work on them and normal seine web is much more available than 7" lead web if you ever need to replace part of your net.

Proposal 66: Support

proposal 64

Oppose

Increasing the allowable size of a set nets hook would make it in practice a fish trap. Fish traps were made illegal in Alaska in 1960 and we cannot allow them to re appear.

Proposal 64: Oppose



PC59

Submitted by: Nicholas Hoffman

Community of Residence: Kodiak Alaska

Comment:

proposal 57 Support

This proposal is a great idea to spread out the herring harvest between spring roe fishery and a fall food fishery. The price paid for herring by processors has declined a lot over the years because there is less demand for herring roe in the world. Splitting up the herring quota to give processors more options for selling it for the best price would be a much better utilization of the herring resource.

Proposal 57: Support



PC60

Submitted by: Iver Holm

Community of Residence: Kodiak Alaska

Comment:

Hi,

My name is Iver Holm i own and operate a commercial seine/pot/jig vessel in the Kodiak management area. I am a 3rd generation Alaska fishermen i grew up set gill netting on the westside of Kodiak island at my mothers set net site in Uganik Bay and spent many days seining with my father on his vessel. I strongly oppose proposal 62 and proposal 70 I don't see a viable mechanism that would allow a set allocation of fish to a single gear type that wouldn't result in the over escapement of many salmon systems. I am in support of permit stacking for set gill net fishermen, it would allow them a better fishing opportunity with the many dormant permits available.

Proposal 52: Support
Proposal 62: Oppose
Proposal 67: Oppose
Proposal 71: Oppose

Proposal 55: Support
Proposal 63: Support
Proposal 68: Oppose
Proposal 72: Support

Proposal 57: Support
Proposal 64: Support
Proposal 69: Oppose
Proposal 73: Support

Proposal 60: Support
Proposal 66: Support
Proposal 70: Oppose
Proposal 74: Oppose



PC61

Submitted by: Oliver Holm

Community of Residence: Kodiak, Alaska

Comment:

I support adoption of proposal#72. In the last Kodiak board cycle, the central and North Cape section management plan was modified to include "or based on pink salmon returning to the Karluk system". The SW

Afognak section was left out of the change. Ever since the west side management plan was adopted the Sw Afognak section had been managed with openings coinciding with the central and North Cape sections. Unless the SW Afognak section is included in the change, it could be closed for poor returns to the NW Kodiak district while the central and North Cape sections in the NW Kodiak district are open for Karluk pinks. This would be absurd and in contravention of "It is the intent of the board that salmon bound for these systems be harvested to the extent possible by the traditional fisheries located in all 17 sections" as stated in the adopting language of the Westside Kodiak Salmon Management Plan.

I support the adoption of proposal # 66 which would allow the use of normal seine web for sewn on leads instead of 7" web. The fish catching benefit would be minimal but the convenience in constructing and maintaining a seine would be significant with just one mesh size to deal with. Some set netters object but they got the use of monofilament web to increase their efficiency recently.

I am opposed to proposals 67,69,70,71, and 74. These proposals would have significant impact on the management of west side salmon stocks and would be contrary to the intent of the west side management plan. I do support proposal 73 that would modify management of the Sturgeon River section on even years from July 16th through August 15th to include managing for Sturgeon pinks as well as Karluk salmon {pinks and sockeye} as modified by the Kodiak AC.

My general comments on the push by NW set netters Assoc. to use the regulatory proposal to increase their catches in the west side: there are fewer set netters fishing and many are fishing for less of the season. This has happened in my family as my wife has recently only fished a few days a year just to maintain her KNW refuge cabin permit. One of my daughters had also set netted and still has her permit but has not fished for several years as she pursues advancement in her dental career. It is possible that other family members may want to fish the site but it is looking less likely. Several of the outside set net sites between Uyak and Uganik have been abandoned due to the rough weather and the depredations of sea lions. Some of these sites were quite productive but tough to fish. Some set netters have been attracted to the Bristol Bay fishery and only set net in Kodiak after the Bay fishery is over. In the time period that the NW set netters use as their goal for "their share", the early run to Karluk was strong resulting in long openings in the central section where they fish. Recently the early run has been weaker and the late Karluk run has been strong and running later. Many of the set net operations are closed up early in the late run. Many seiners are also done early too but a small segment of the seine fleet has harvested the very late fish. What is the logic that fish caught by a small segment of the seine fleet after most set netters have quit due to school, winter jobs, or closed markets should result in the entire seine fleet being penalized in June, July and August?

I am a probably retired 76 year old Kodiak seine permit holder. My son and son in law are active seiners. While some high liners in the seine fleet are doing well, there are many lesser producers having a hard time getting by. The drop in prices and a poor return expected for pinks will put more seiners out of business this coming year. Already about half of the seine fleet that was active in the eighties has fallen out of the fishery.

Some of the proposals put in by set netters for the west side would make management much more difficult. With all of the many salmon streams through out the west side it is of necessity a mixed stock fishery with a blended harvest approach. The west side management plan may not be perfect but it works. I hope that the board does not make changes that wreck the plan.

Sincerely Oliver Holm



Submitted by: Brooke Inman

Community of Residence: Kodiak, Alaska

Comment:

Dear Board of Fish Members,

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,

Brooke Inman

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



I am a life long commercial fisherman and 2nd generation Kodiak seiner. I grew up fishing with my dad and siblings and continue to fish with my sisters on my boat and alongside my brother on his own seiner which he purchased in 2023. My dad fished the central section on the west side of Kodiak throughout his career and I have continued to spend the majority of my seasons fishing these same areas.

I strongly oppose proposal 62

By implementing a 48hr advance opening for set netters and mandatory 48hr weekly closures for seiners the likelihood of fishing being a viable industry for me would be non existent. The Kodiak seine fishery has never been a short spurt fishery, the seasons are long and every fishing day matters. Small production days throughout the season add up and by curtailing the number of days that we can fish will make it difficult to make a season add up. In addition, closing the central section to seining would force the fleet to be concentrated in the remaining areas putting additional pressure on these runs, further limiting the fishing opportunities available to the seine fleet as whole. Closures to both gear types for conservation makes sense but for strictly allocative measures it is not justifiable.

I strongly oppose proposal 70

By allocating a non terminal harvest stock to a small portion of the salmon fleet the seiners will be largely put out of business. The central section is not a terminal harvest fishery and managing allocation goals would be impossible while managing for a sustained yield. Curtailing the seine fleet by allocating fish to the set netters would not guarantee these fish would be then swimming into the gill nets. The composition of the gill net fleet has changed dramatically since the 90's with gill net no longer fishing on the capes where many of the fish were historically caught by their gear type.

**I support proposal 60**

Allowing the department to implement 48hr extensions in the mainland district during the second two July openings in sections where the local pink and chum runs are strong. By giving the department the tools to extend this area when runs are strong the department will be better able to manage for sustained yeild. These extensions will help to spread out the seine fleet giving more opportunity to boats in every area

I support proposal 66

Kodiak is the last seine fishery in the state that requires lead web, by ending the requirement of incorporating lead web the seine nets will remain the same overall length and would not change any fishing methods. These changes would allow for a uniform net, no longer necessitating carrying multiple types of patch web and decrease the complexity of building nets

I support proposal 73

Adding Sturgeon River escapement considerations into the management of the Sturgeon section during even numbered years. Giving the department the tools to allow for fishing opportunity when stocks are strong and conserve when runs are weak. This would allow for a more fishing opportunity and spread out the seine fleet. While also giving management more tools to adequately manage Kodiak salmon runs.



Dear State of Alaska Board of Fisheries members,

My name is Sue Jeffrey and I am a Kodiak salmon setnet permit holder. My husband Dan Ogg also holds a Kodiak salmon setnet permit and together we have been fishing our setnet site in Uganik Bay since 1987. We have lived in Kodiak for more than half a century now and 2024 will mark our 38th salmon season in Uganik Bay.

I am writing today in support of Proposal numbers 62, 64, 70 and 71. Though different in methods, I am in favor of all four as they provide the means to help the Kodiak setnet fishery remain solvent and regain our historic share of the west side salmon harvest.

Throughout these nearly 40 years, we, like our fellow setnetters, have continually upgraded our fishing operations, investing in gear and equipment to increase our harvests and improve fish quality. However, it has become apparent over the years that improvements to our fishing operations in the west side setnet fleet are no match for the increasing efficiency and catching capacity of the Kodiak seine fleet.

This is played out in the Central Section on the west side of Kodiak Island because this is where the setnet fleet competes directly in time and area with the seine fleet. That is, nowhere else in the entire Kodiak Salmon Management Area are seiners and setnetters co-managed by regulation to fish at the same time within the same area. In other words, besides the Central District, which is open to both seine and setnet gear and the small setnet only district at the south end of Kodiak Island, the entire Kodiak Salmon Management Area is exclusive to seine gear only.

Therefore, I oppose Proposal numbers 66, 72, 73, 74. These proposals change Time, Area, or Gear regulations that increase the Kodiak seine fleet's efficiencies, harvest capacity and harvest opportunities, all at the expense of Kodiak's west side setnet fleet.

I very much appreciate your time and service on the Board of Fish and your consideration of this matter.

I also look forward to talking with you in Kodiak.

Sincerely,
Sue Jeffrey



Submitted by: Charlie Johnson

Community of Residence: Homer

Comment:

proposal 64 and 70 claim the setnetters harvested 50 percent of sockeye and 30 percent of pinks from 1990-2012 and for the last ten years only 34 percent sockeye and 19 percent of pinks for the west side . Driving down the west side of Kodiak in 1990 there were alot more set nets out there than there is are now . fewer nets in the water is going to equal less of a percentage of the total fish.

Proposal 60: Support	Proposal 61: Oppose	Proposal 62: Oppose	Proposal 63: Support
Proposal 64: Oppose	Proposal 65: Support	Proposal 66: Support	Proposal 67: Oppose
Proposal 68: Oppose	Proposal 69: Oppose	Proposal 70: Oppose	Proposal 71: Oppose
Proposal 72: Support	Proposal 73: Support	Proposal 74: Oppose	



Submitted by: Chris Johnson

Community of Residence: Kodiak, AK

Comment:

State of Alaska Board of Fisheries

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

Chairman Wood and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak. I grew up fishing on my dad's boat and haven't missed a salmon season since I was 18. I bought into the industry in 2011 with a 25-foot jig boat and access to the jig fisheries focusing on cod and rockfish was the way that I could afford to move into the salmon fleet in 2013. I now rely primarily on salmon seining and live here year-round with my wife.

I believe that misleading data has been used to argue that seiners are cutting off fish from reaching setnetter's nets. They have included harvest from Inner and Outer Karluk, the Inner Bays, and Telrod Cove in their data, which are seine only areas that fish reach after passing through setnet areas. The setnets aren't catching them. Additionally, many of the fish harvested in Inner and Outer Karluk don't pass through the Central Section, and instead migrate to the Karluk system from the south.

All in all, I am supportive of finding ways to help my fellow fishing community members just so long as it does not mean taking time away from any one gear group to give to another. I am strongly in opposition to anything purely allocative. Any one of the proposals that attempt to create policy to take fish from one net to another would do untold damage to this fishery, this community, and most importantly, damage to the ecological system that we all rely on for our livelihoods.

I appreciate your time on this,

Chris Johnson, 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



PC67

Submitted by: Dimitian Kalugin

Community of Residence: Homer

Comment:

I am opposed to praposal 54. I am oppsed do to weather is usually better april time for small boats and fish schools up.

Iam for praposal 55.

Proposal 54: Oppose

Proposal 55: Support



PC68

Submitted by: Kiprian Kalugin

Community of Residence: Homer, Alaska

Comment:

NO on proposal 54

YES on proposal 55

Proposal 54: Oppose

Proposal 55: Support



PC69

Submitted by: Safron Kalugin

Community of Residence: Homer ak

Comment:

54no

55yes

Proposal 54: Oppose

Proposal 55: Support



Submitted by: Vladimir Kalugin

Community of Residence: Homer ak

Comment:

As a long time jig vessel I'm against proposal 54 and for proposal 55 because we only start catching cod around march 25th and it would be unfair for the pot boats to over take our quota.

Proposal 54: Oppose

Proposal 55: Support



Submitted by: Darius Kasprzak

Community of Residence: Kodiak, Alaska

Comment:

Madam Chair Marit Van-Dort and Board of Fish,

I am Darius Kasprzak, a Kodiak ported Jig fisherman owner- operator. My Jig vessels currently are F/V Marona (46') and F/V Lady Viking (34'). I am also experienced with a quarter century of Jig cod harvesting during continual Kodiak jig seasons.

I am Chair of, and representing the Alaska Jig Association (AJA).

AJA is strongly opposed to proposal 54. We consider this proposal to be a nearly perpetual, and de facto reallocation of Jig GHL to Pot GHL.

The inordinately high trigger percentage (25%) would put undue pressure on the predominantly small vessel Jig fleet (including open skiffs) to prematurely harvest Jig GHL, during the cold and stormy months of January through March. Our Kodiak fleet has demonstrated a stellar safety record throughout the years, and we would like to maintain this safety record. We believe it to be inadvisable to pressure the small vessel Jig fleet to take chances at this inclement time of year, in order to meet a catastrophically high trigger threshold for not relinquishing our Jig GHL to the Pot sector .

Consider that during the most recent Kodiak jig season (2023) the Jig fleet harvested its dedicated GHL by April 22, despite a harvest of only 20% GHL by March 25. In 2010, a season I remember well- our Jig fleet was reeling from historically low ex-vessel cod prices, following the Great Recession. After a GHL harvest of 13.4% by March 25, our sector went on to recover economically by fully harvesting a large GHL of over 6.5 million pounds.

Under the hypothetical scenario of proposal 54: our Jig fleet would have been dramatically preempted from catching our dedicated GHL, during these and other harvest years.

We would like to note that the status quo is working quite well; in the three full years that the current partial rollover provisions have been in effect, the Pot sector has had access to the Jig GHL during the single season (2022) of low Jig harvest. This is, despite the Pot sector not capitalizing on this opportunity to fully harvest the shared Jig GHL.

Conversely, the Jig sector has fully harvested its GHL (>90%) during the other two years of no rollover (2021 and 2023).

A lack of the rollover and the subsequent closing of Statewater Pot season does not mean an end of cod harvest ability for Pot vessels. In fact, Pot vessels can merely switch over to Jig gear and continue to harvest Jig GHL alongside the dedicated Jig vessels. Indeed, many Pot vessels have deployed this tactic of gear switching, to continue harvesting over the history of numerous Kodiak Statewater cod seasons.

AJA strongly supports proposal 55, which we have authored. In order to provide additional clarity to cod fishing stakeholders and the Department, we propose a realistic harvest trigger (10.2 %) which represents the ten year average of harvested Jig GHL by March 25.

To the best of our knowledge, a ten year average is consistent with the historical data utilized by the Department (under status quo).

Please note that we intend to modify Proposal 55 by submitting a Record Copy (RC) at the January 2024 BOF meeting in Kodiak. The RC will change the Proposal wording “the Commissioner may reopen a state-water season” to “the Commissioner shall reopen a state-water season”. This wording change will immediately rectify the Department’s concern over objective criteria (see Proposal 55 Staff Report) by removing any residual ambiguity regarding the rollover implementation criteria. This additional clarification will also benefit all stakeholders.

The Jig cod fishery is one of the only existing entry level fisheries, that is available to young and new participant stakeholders in the Kodiak Archipelago. It is very important to our town’s economy and diversity, that the Jig fishery not be expressly curtailed.

Welcome to Kodiak!

Darius Kasprzak

President, Alaska Jig Association

Proposal 54: Oppose

Proposal 55: Support



My name is Gary Knagin and I'm a Kodiak salmon seine permit holder. I've been fishing all my life mostly in the Kodiak area. I started getting compensated for salmon fishing in 1969 when I was 12 years old. Before that it was mostly just helping my parents with the family's setnet site on Uganik Island. Even at that young age I realized set netting on the westside was more of a lifestyle choice rather than a means to making serious money. My brothers and I talked my Dad into buying a seiner. He did and we started fishing the little 32' seiner in Terror Bay for a couple of years before moving further away from our set net site and eventually selling both the set net site and 32'er for a larger boat.

Cutting the seine fleets time reeks of an exclusive set net fishery that has never historically existed. Although I empathize with the set net holders the numbers looked at when one hears the percentage of fish historically caught by each user group do not truly represent what happens in a season. ie; the set nets are usually done and put away by the first week in September while there are some seiners that fish later in the season. Personally my latest delivery was October 7th and there are others who've been out longer.

The arguments that we are so much more efficient than we used to be are true, if you do anything long enough you eventually get better at it . In 1975 we were pulling our net in at a rate of 15 minutes sometimes a little faster, speedy retrieval of our gear isn't a new development. That being said adapting and overcoming are not things that should be penalized. It is why 160 boats are catching what historically 370 did in the past, less jobs will surely be available, therefore impacting the economy of the south central district as a whole. In my 40+ years fishing, I've seen the salmon industry move on an up and down cycle. It's on a down cycle and we'll all just have to figure out a way to deal with it, as we have in the past.

Proposals 62, 69 and 70 would be detrimental to the fleet. Set netters are asking for an allocation of fish that they can't possibly or are unwilling to harvest. With the smaller average sized pinks smaller mesh is required to catch more pinks which is less likely to entangle the larger species of sockeye salmon. With the largest section of the Kodiak area essentially closed to the seine fleet & fuel costs at the high level it is, travel to other areas in sometimes inclement weather conditions, safety is a concern. Further reducing the efficiency of the fleet would have a direct impact on the overall economy of our community, reaching far beyond the harbors.

I therefore urge the board to not implement these hardships. Again vote no on proposals 62,69 & 70.

Respectfully,
Gary Knagin



To: John Wood, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

December 26, 2023

RE: Support for Board Action to Remove Proposal 59 from Consideration in Kodiak

TO: Chair Wood and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) would like to thank the Board for taking action to remove Proposal 59 from consideration at the upcoming Kodiak meeting of the Board of Fisheries. The discussion and action that took place during Miscellaneous Business on December 2, 2023 properly identified that Proposal 59, as published, referenced a statewide regulation and would impact all hatchery programs and thus should not have been placed on the agenda for Kodiak.

The inclusion of Proposal 59 as a statewide proposal for the Kodiak meeting generated consternation amongst the aquaculture associations and stakeholders alike as it would require a response from across coastal Alaska and drive stakeholders to attend a meeting outside of area, for most, and out of cycle. Furthermore, this prompted questions from a number of stakeholders to determine how such a proposal would have been included for Kodiak when it did not include reference to any Kodiak hatchery or local management plan. In discussion with ADF&G and Board Support staff, it was indicated that the original version of the proposal, as submitted, did reference Kodiak hatchery programs. KRAA made a request to view the original proposal and made the discovery that the original proposal did reference the given statewide statute but then included a Kodiak hatchery management plan that *does not exist* in regulation—or elsewhere. The fact that this hatchery management plan does not exist did clarify, to an extent, why Proposal 59 had likely been altered from its original language; when it was reviewed, the editors, likely recognized the references made were to a nonexistent management plan and were left only with a statewide regulation. At that point, one might expect that the proposal would (should) not have been published because it did not meet the call. Again, for this reason, KRAA supports the action the Board took to remove the proposal from consideration.



What is confounding in the process is that, since the Board took action to rightfully remove Proposal 59 from consideration, that proposal has been further edited and now exists in yet a different form from both the original and published versions. The current version still references the same statewide regulation but again makes reference to a non-existent Salmon Enhancement Allocation Plan and then goes further than either previous version to specify pink salmon.

In the most present iteration, the proposal has no more merit or validity than it did in either its original or published version, and leads me to speculate again on the process for determination and selection of proposals for publication. Again referencing the December 2, 2023 discussions under Miscellaneous Business, Board members questioned Board Support staff in relation to the cited regulation (5AAC 40.820), and it was recognized that the regulation in question is not one that falls under Board authority. The proposal's failure to offer valid reference to existing regulation or to propose regulatory language to meet the proposal request would also appear to fail any reasonable test for whether a proposal should be considered by the Board. KRAA opposes Proposal 59 in any form, and again supports the Board's action to remove it from consideration.

When I first engaged in the Board of Fisheries process, there was clear direction on the minimum standard for acceptance of a proposal for publication for an area. I understood I must identify the proper regulation and provide the correct form of editing or new language to achieve the aim of the proposal or it would not be accepted. If I needed assistance, it was clear that it would be available through inquiries to ADF&G staff; however, at the point of submitting a proposal to the Board of fish, it was clearly my responsibility to meet the necessary requirements.

Through the Boards of Fish and Game process, the State of Alaska honors the public with the ability to participate in the decision-making process for their fish and game resources and management. That honor brings with it an obligation for a member of the public to know and understand the resources and management of an area in which they submit a proposal, to have an awareness of the potential impacts of regulation they may propose, and to submit proposals that meet the requirements stipulated for consideration under the Board process and required to meet standards for publication and inclusion on the Board's agenda. The recent set of proposals targeting hatchery programs, like many of those of the previous 5-year period, fail to meet that standard, and yet we find ourselves at almost every Board of Fisheries meeting trying to battle misinformation and lack of understanding of the hatchery programs in the form of proposals such as Proposal 59.

Whether it was the proposer's intent or aim to include all hatchery programs or just those of Kodiak with Proposal 59, the constant, and often repetitive, series of hatchery proposals has us fighting the same battle at every meeting in nearly every area. Whether a proposal is directed at a single hatchery or all, it mobilizes and demands of hatchery operators and stakeholders across



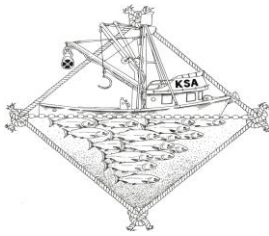
coastal Alaska alike that we engage and dedicate time and resources to protect the fisheries resources of the communities we all serve. For this reason, we would suggest there may be a way for the Board to structure future calls for proposals to the Board of Fisheries in a manner that raises the bar for hatchery proposals to be published in area and potentially centralizes hatchery-related proposals.

KRAA would like to again thank the Board for its action to remove Proposal 59 from consideration in Kodiak. We hope that, with regard to any future for this proposal, it is further recognized the proposal is improperly crafted to be accepted for publication in any form and it offers neither reference to an existing applicable regulation or management plan nor regulatory language for implementation that would allow for adoption by the Board. KRAA also encourages the Board to consider crafting future calls for proposals in a manner that limits the frequency and necessity to address broader hatchery matters in every area and every meeting.

Thank you for the opportunity to submit these comments.

A handwritten signature in blue ink, appearing to read "Tina Fairbanks".

Tina Fairbanks
Executive Director



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 26, 2023

To the Alaska Board of Fisheries,

The following comments apply to proposals 62 and 70, both of which intend to allocate fish to the setnet fleet by imposing setnet-only fishing periods and mandatory seine-closures in the Central Section of the Northwest Kodiak District. The Kodiak Seiners Association (KSA) is **strongly opposed** to these proposals. The data used in these comments is publicly available and was provided by the Alaska Department of Fish and Game and the Commercial Fisheries Entry Commission.

The Kodiak Seiners Association wholeheartedly disagrees both in theory and fact with the claims that underpin Proposals 62 and 70. The central hypothesis that setnet harvest declines are somehow driven by seine activity is demonstrably false, as shown later in this presentation. Other factors such as reduced participation in the setnet fishery, algal slime, a diminished early Karluk run, a strengthening late Karluk run, and small pink salmon are the primary sources of the declines in setnet productivity. All of these factors are discussed in detail below.

Just as much as we contend the factual basis determining the decline in setnet harvest rates, we also question the assertion that the average distribution of harvest that occurred from 1990 to 2012 is somehow objectively equitable. Despite the claim in the justification language that setnet harvest rates have “declined significantly since 1990,” the truth is that setnet harvest percentages *increased* continuously from 1990 to 2012, which begs the question of whether, based on the same justifications claimed in the proposal language, the Board should already have taken action during this period to curtail setnet harvests in order to restore the fishery to prior historical distributional norms. In fact, the distribution of harvest prior to 1990 is very similar to current rates, despite the fact that setnet effort has declined dramatically since that time.

Additionally, the period from 1990 to 2012 was also one of absolute economic carnage for the seine fleet. Collapsing salmon markets resulted in a precipitous loss of vessel participation during this period. The Kodiak seine fleet declined from 354 vessels in 1990, to a low of 128 in 2008, and although there has been somewhat of a recovery and stabilization of the fleet to an average of 160 participating vessels, participation rates have not exceeded 50% of available permits since 2000. No other major salmon fishery in the state has endured such a prolonged level of suppressed participation, and this has occurred despite the fact that Kodiak seine permits remain the lowest valued of any seine fishery, regularly trading below \$40,000. We ask the Board to consider how one could justifiably declare that the standard for the “equitable” distribution of harvest between gear



types is one that occurred during peak productivity of the setnet fleet and the simultaneous string of bankruptcies experienced by the seine fleet?

The Board should also understand that the Central Section is the largest and most fished section in the KMA with the most fishing opportunity and highest overall productivity. This area is the breadbasket of Kodiak, and since 1985 an average of 75% of participating vessels have fished this area. Needless to say, loss of harvest opportunity for the seine fleet in the Central Section would be devastating, and would only continue the deterioration of this fleet that began in 1990. These proposals were developed without any input from or consideration for the local seine fleet, and especially for the vessels hailing from the 3 remote communities that are located within the Northwest Kodiak District.

Finally, the Board should consider the general futility of attempting to allocate fish to a non-terminal, mixed stock, multi-species setnet fishery. No such allocative plan exists in the state, and for good reason – setnet fishermen cannot reliably harvest salmon in non-terminal areas, and individual fishermen cannot even simultaneously harvest multiple species with equal effectiveness, as differing body size complicates any effort to select a web mesh size that will optimize harvest of all species at once. The Central Section is a mixed stock harvest area and is home to substantial pink, chum, sockeye and coho runs with overlapping run timing. And while west side setnet fishermen are, and remain, highly effective at harvesting sockeye, their ability to harvest other species is highly unreliable, and many fishermen simply choose to target just sockeye for the entirety of the season, despite the presence of multiple stocks.

The following is a point-by-point analysis of how changes in west side run dynamics, ecology, and participation rates have impacted the harvests volumes and gear-type distribution, as well as some of the flaws in the central claims that support these proposals.

Bad Data

Much of the data that has been used to demonstrate the seine fleet's impact on the setnet fleet has been applied inappropriately and does not support their central thesis that seiners operating in the Central Section are depriving setnetters of traditional harvest volumes. In the justification language for proposals 62 and 70, the proposers aggregated harvest data from the inner bays, Telrod Cove special harvest area, inner Karluk and outer Karluk sections, even though each of these sections are seine-only areas that fish can only reach after migrating past or through setnets in the Central Section, or in the case of Karluk may not have even migrated into the Central Section when heading to their natal stream. These sections are essentially overflow areas where seiners only get to harvest surplus fish that the setnet fleet failed to catch – in other words, we get their leftovers in these sections. If seiners operating in the Central Section were somehow preventing the setnetters from harvesting fish, then naturally these areas would also be deprived of salmon. Including harvest from these areas in their argument that seiners are cutting them off is entirely illogical.

The inclusion of harvest from the inner and outer Karluk sections is particularly misleading, since many of these fish don't even migrate through the Central Section, and a substantial portion of the sockeye caught here in recent years were harvested in the late-season when most if not all of the setnets have been removed from the water. In fact, the late-season fishery at Karluk is relatively new; 2012 was the first season in many years with continuous fishing time and effort in this area.



The growth of this fishery is the result of an increasingly strong late sockeye run coupled with reduced escapement goals that has generated more fishing opportunity in the inner and outer Karluk sections in September. The Karluk River produces the latest sockeye run in the state, with peak productivity typically in September. To get an idea of how much this fishery has grown, the 146,720 sockeye that seiners harvested in inner Karluk in 2023 is more than the combined total harvest during the 25-year period from 1987-2012. All of this harvest occurred after virtually every setnet had been removed from the water.

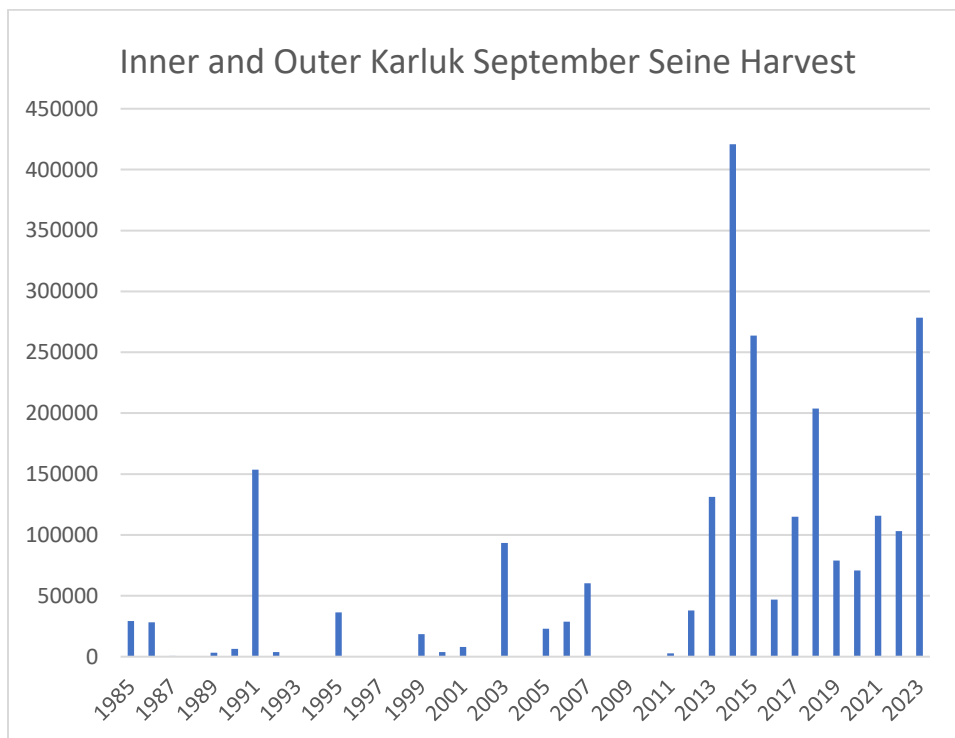


Figure 1: The late-run Karluk fishery suddenly materialized in 2012.

Despite assertions in the proposal justification language, Late Karluk sockeye historically do not tend to migrate through the Central Section to nearly the extent typical of early-run fish, therefore many of these fish wouldn't be caught by the setnet fleet even if they exhibited significant effort this period. During the past 10 years, seiners have harvested an average of 170,000 sockeye in the inner and outer Karluk sections in September while setnetters have produced little to no effort. Over half of the setnet fleet didn't even fish past September 5 in all of these years, and they averaged just 1.3 deliveries per permit during this period. In fact, in 2022 and 2023 there was virtually no setnet effort in September. The inclusion of harvest data from inner and outer Karluk, and even the Central Section, during a period of time when setnetters are barely even fishing creates a highly misleading characterization on how seine effort has impacted setnet effort over the past 10 years. Proposals 62 and 70, if adopted, would close off the Central Section to seining for some if not all of September even if no setnets are left in the water, as was the case in 2022 and 2023.

Harvest data from the inner bays and Telrod Cove also does not support the central hypothesis that seine fishing activity is depriving the setnet fishermen of harvest opportunities. Fish harvested in these areas must first pass through the Central Section, and are only harvested once



they have migrated past every setnet site. In fact, it is the effectiveness of the setnet fishermen that impact this area, and not vice versa. Spikes in harvest in these areas in years like 2017 and 2019 simply demonstrate that substantial volumes of fish were available for setnet harvest, yet they failed to catch them. More will be discussed on this topic shortly.

Additionally, the justification language in proposals 62 and 70 imply that the setnet fleet is in a state of economic freefall. Publicly available data on fishery earnings from the CFEC clearly suggest otherwise. Over the past 20 years setnet earnings in Kodiak has been slowly, yet steadily increasing. While the rate of increase has not matched the seine fleet, neither has the growth in operating costs for setnet fishermen matched that of the Seiners who have endured skyrocketing fuel, insurance, and maintenance costs on a fleet of vessels predominantly built over 30 years ago. The Board should keep in mind that the seiners endured a long period of economic hardship that resulted in the loss of over half of the participating fleet, which naturally contributes to an increase in average earnings. While the setnet fleet has also declined in participation, they still have yet to undergo a period of economic hardship comparable to the one experienced by the seiners.

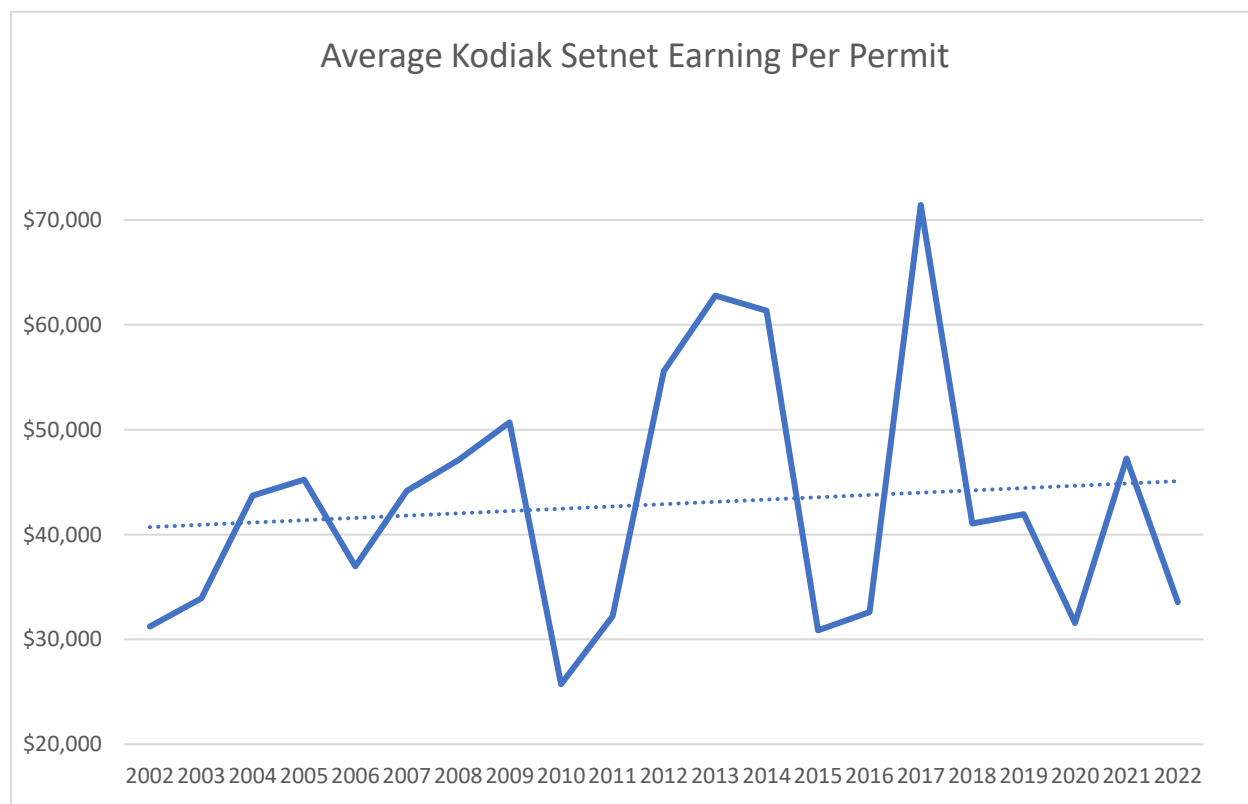


Figure 2: Kodiak setnet permit average earnings have been gradually increasing for 20 years. It should be noted that this data is for all setnet permits, including Alitak, since the CFEC doesn't resolve data by regulatory section, however, west side setnet fishermen account for the majority of setnet permits fished in Kodiak.



Decline in Sockeye

The harvest of sockeye in Kodiak has declined substantially since the peak harvest era of 1990-2007. On average, Kodiak fishermen have harvested 36% fewer sockeye annually since that time for all gear types. The Central Section has generally followed this trend and has experienced a 40% decline in sockeye harvested by both gear types over this same period. Proposals 62 and 70 attempt to identify the seine fleet as the primary source of their recent harvest declines, yet these proposals fail to recognize that *both* gear types have experienced dramatic reductions in sockeye harvests as a result of overall lower productivity in comparison to the 1990's and early 2000's. A setnet fleet that has capitalized around higher historical productivity will naturally contract during periods when runs decline.

One thing to note is that despite reduced effort by west side setnet fishermen, their share of the overall Kodiak area harvest remains within their range of historical productivity both as an aggregate harvest for their gear type and as a percentage of total harvest per permit. Their productivity in recent years is below their *peak* era of the early 2000's, however, their higher production at this time relative the rest of the island's fishermen clearly resulted from a combination of optimal run dynamics and historically low seine participation. It is particularly important to note the sudden drop in productivity that occurred in 2008 and that has been sustained ever since. This isn't due to a sudden influx of highly efficient and effective seiners that year – in fact 2008 is the year with the historically lowest seiner participation at 128 vessels, instead, the reduction from peak productivity was the result of suddenly occurring and since sustained change in run dynamics on the island, as will be explained later. Nevertheless, overall reduction in sockeye productivity for Kodiak naturally lead to declining participation rates by setnetters, which in turn has resulted to their reduced relative productivity.

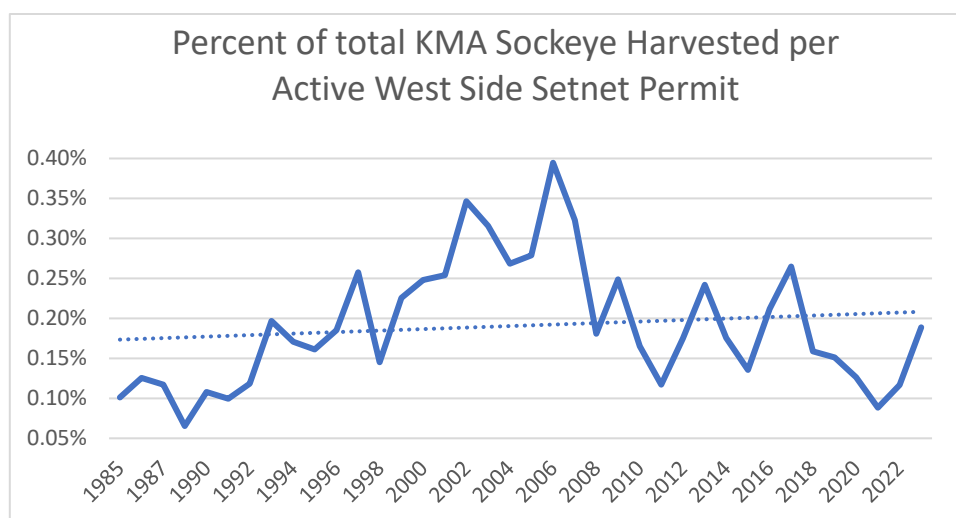


Figure 3: West Side setnet fishermen have kept up with the Jones', so to speak. Their portion of the total KMA sockeye harvest per permit fished remains in the historical norm for the management area.



Reduced Setnet Participation

Diminishing effort within the setnet fleet has been the greatest driving factor reducing West Side setnet harvest rates. Not only are there steadily fewer setnet permits being fished, but current active permit holders are opting to fish fewer days – a result that shouldn't be surprising given the

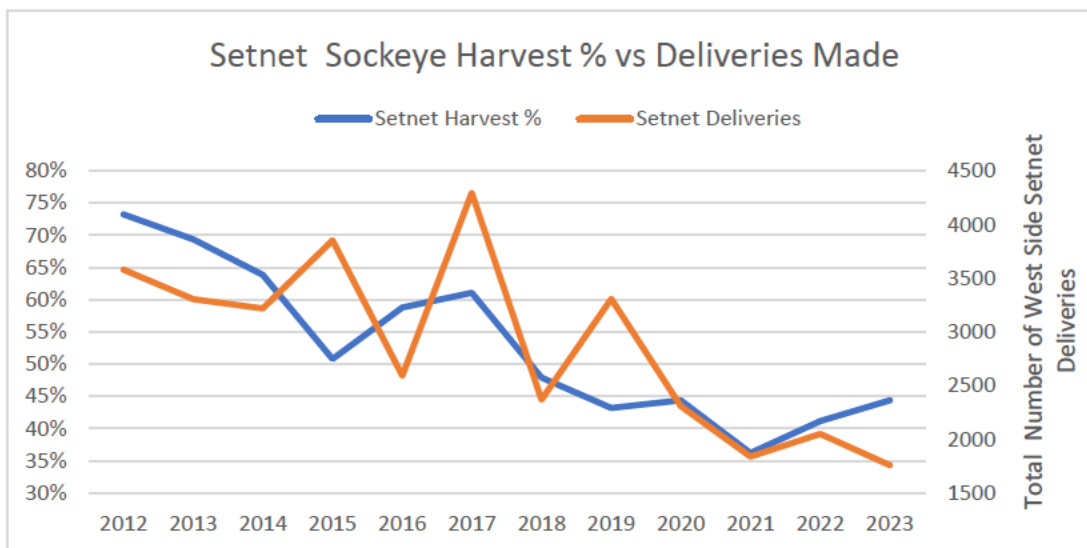
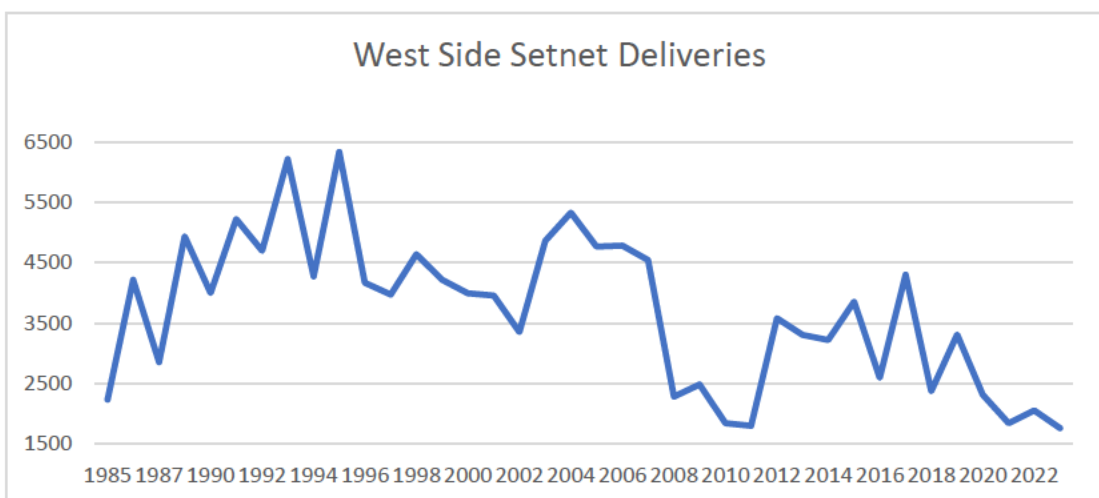


Figure 4: The percentage of sockeye harvested on the west side has closely tracked the number of deliveries made by setnet fishermen. Generally speaking, the more days they choose to fish, the higher portion of the fish they catch.

overall reduced volumes of sockeye present on both the West Side, and the Island as a whole. Reduction in setnet harvest rates track very closely to annual effort: When fewer setnetters are fishing, their harvest rates decline as is apparent in figure 4. The graph below shows the long-term trend in delivery patterns. Setnetters are proposing that the time period from 1990-2012 represents what they feel should be used as the standard for their expectation of harvest rates, however they



averaged 47% more deliveries during this period than over the past 10 years. Again, overall



reduction in fish volumes along with deteriorating market conditions has led to a substantial reduction in setnet effort which in turn has caused the decline in their total gear type harvest rates.

Despite the decline in aggregate setnet sockeye harvest rates, the actual effectiveness of the setnet fishery has increased over this same time when analyzing the portion of the catch per setnet delivery. That is to say, although total harvest declined over time for both gear types, setnetters are actually catching a higher portion of the sockeye when they actually fish. The chart below plots the change over time in this trend. However, reduced effort from the gear group has resulted in lower

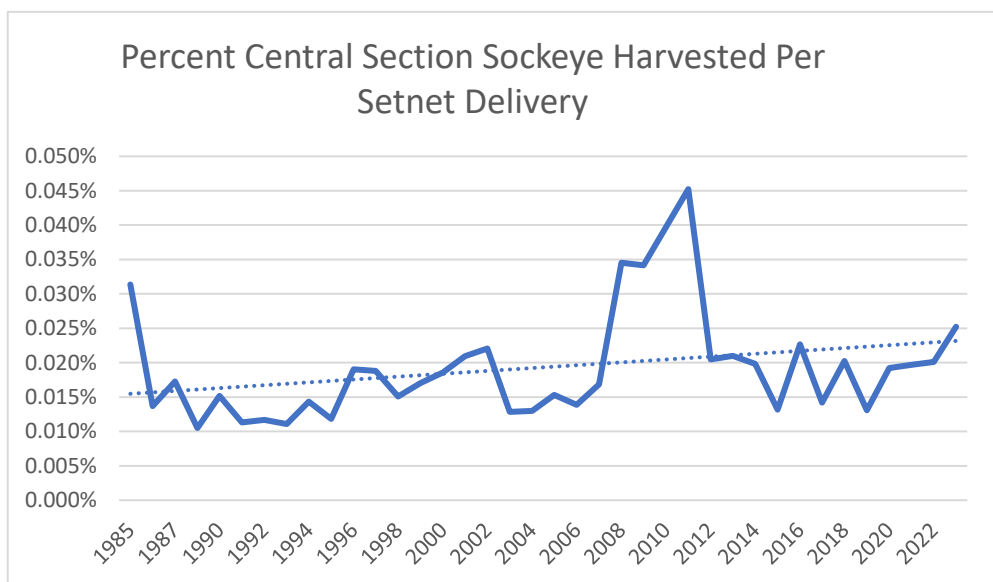


Figure 5: The average West Side setnet sockeye delivery as a portion of the total combined sockeye harvest for the year has been increasing over time.

aggregate harvest rates as fewer setnet sites are operating, and many sites are choosing to fish a shorter season, despite the fact that fishing opportunity has generally remained stable over time.

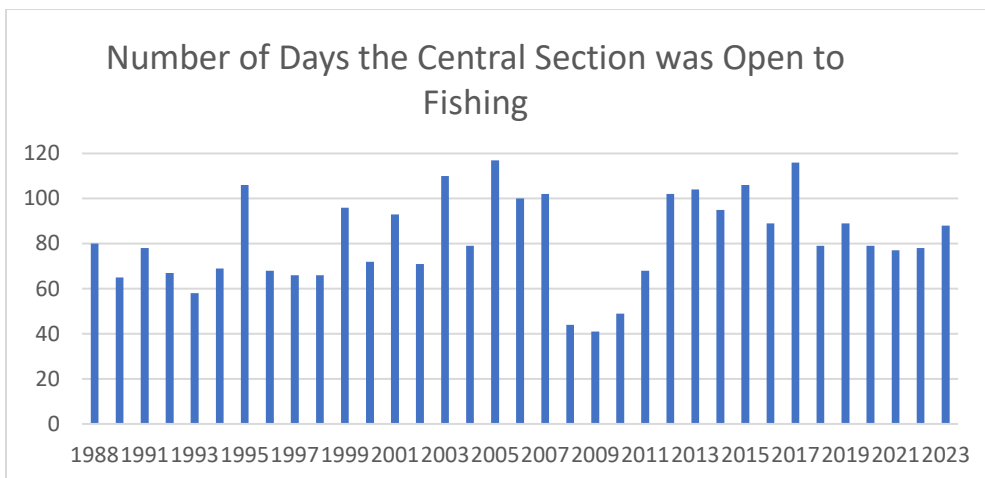


Figure 6: The number of days the central section has opened has increased on average in recent years.

In addition to reduced overall participation rates, setnetters have also geographically contracted their efforts. The roughly 25 mile stretch of coast line from Broken Point in Uganik Bay to Chief Cove used to be home to some of the most productive setnet operations on the island, yet now there is little to no regular setnet effort for this entire stretch of coastline, as sea lion predation and increasingly rough weather conditions have made operating in this area untenable for setnet fishermen. These setnet sites were historically intermixed with seine sets, so that by retreating from this area, much of the fish that would have been caught by those sites are now harvested by seine fishermen working in that area, creating a compounding effect to reduce setnet harvest rates. The red line on the map below shows the stretch of coastline that once produced prolific setnet harvests and that they choose to no longer fish regularly.

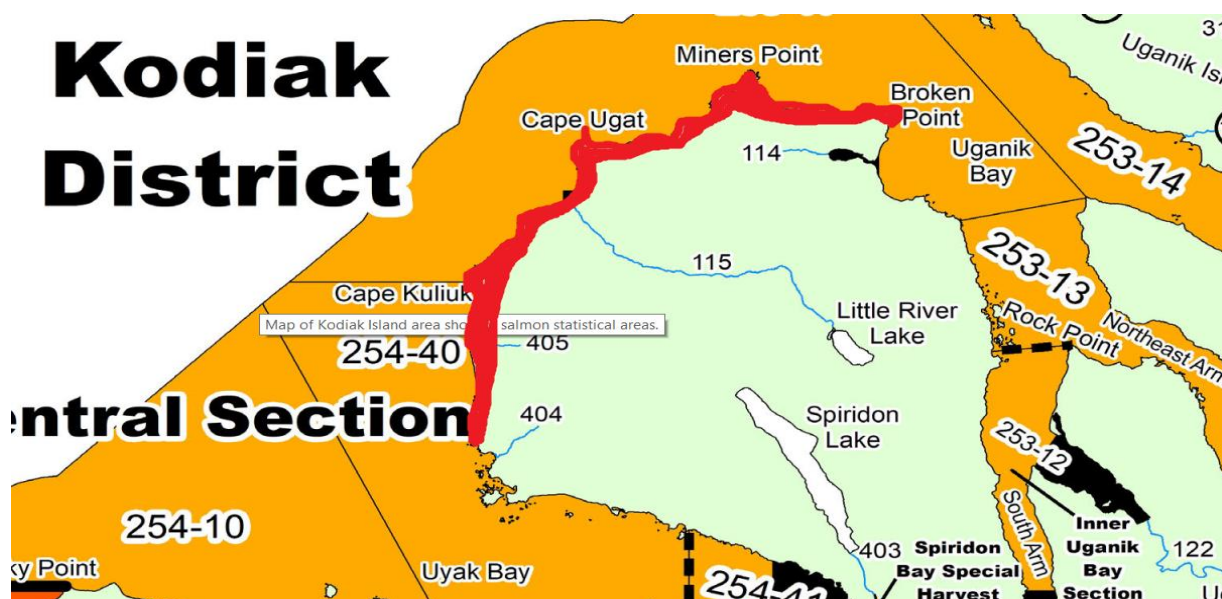


Figure 7: Area no longer regularly fished by setnet fishermen.



It makes no sense to expect the relative productivity of the setnet fleet compared to the seine fleet to remain at the historically high levels of the early 2000's when there are fewer setnets being fished, their fishermen are choosing to fish fewer days, and they are fishing a smaller geographic area, all while virtually abandoning effort along the most productive stretch of coast line in the Northwest District.

Algal Slime

Another major driving factor in the reduction of setnet harvest rates is the increased occurrence of algal slime. In order to address this problem setnetters submitted **proposal 67** for the 2020 BOF Kodiak finfish meeting requesting the use of monofilament web. The theory was that algal slime would not bind as readily to monofilament fibers as it does with multifilament web. Although the seiners were concerned with the potential ecological impacts of employing a web type that would likely increase the dropout rate in a fishery that already has an excessively high dropout rate, we supported their attempt to mitigate the algae problem through this proposal and the Board ultimately passed proposal 67. In their justification language for the proposal, the Northwest Setnetters Association declared

Kodiak salmon setnet fishermen are experiencing increasing extreme slime events. 2017 and 2018 were the worst that have occurred. During these time periods – approximately 26 days in 2017 and 21 days in 2018 - setnets were coated with slime and rendered unfishable. The slime occurred during some of the most productive time periods, late July and early August, for Kodiak setnetters. The slime we are experiencing is so heavy it is difficult to leave our web in the water. It becomes so heavy that it breaks the net from the setnet frame.

There were numerous public comments submitted by setnetters that included testimonials on how drastically the fishery is being impacted by the slime. One person wrote

I have seen how slime events can drastically shut down our fishery. I like a clean net and have both a volume pump and pressure washer that I use all the time, but when the slime hits no matter how often I wash the net, the fishing just dies

Another person wrote

...over recent years, we have been plagued by a thick gooey slime you can wash your net clean, and by the time you're done, it's slimed again. It totally stops your fishing.

There are numerous other public comments that decry the increasingly negative impact that algal slime has placed on the fishery. Even at the 2023 Kodiak Advisory Council meeting, one setnetter declared that algal slime essentially shuts her operation down for “weeks”.

Knowing that setnet gear, by the admission of setnetters themselves, is now frequently rendered entirely ineffective for weeks at a time during the most productive period of the season, it is difficult to understand how the Board or the Department could effectively allocate fish to a gear type that has publicly stated that they cannot catch them.



Given that the time frame during which the algal events occur coincides with the peak of the local pink and chum runs, it is no wonder why their share of the harvest would decline, even without their substantially reduced participation rates. If seine-only closures were implemented on the west side, then the likely result would be drastically reduced total harvests out of the section, since if the seiners aren't allowed to catch the fish, and the setnetters aren't able to catch the fish, then substantial volumes of surplus salmon would simply go unharvested. Not only would this violate the sustained yield principle, a constitutional requirement that underpins the sustainable and beneficent management of Alaska's fisheries, but this would contribute to an overall depressed local economy for the community of Kodiak, where we rely on the ability of our fishing fleets to maintain the opportunity to sustainably access our local fishery resources.

Reduced West Side Run Volumes

While many setnetters are fixated on shifting distribution of harvest between gear types, the primary factor driving declining harvest is weakening overall run strength of both sockeye and pink salmon. 1990 to 2007 is the historical peak for both sockeye harvested in the entire KMA as well as the Central Section. Since that time the Central Section has experienced a 40% reduction of total sockeye harvested by both gear types and a 29% decline in pink salmon harvests. There are some notable changes in particular that have a significant impact on setnet harvests, which are described below:

1. Karluk Early-run Decline

The early Karluk sockeye run came roaring back to life in 1992 after over 50 years of poor productivity. This run became the cornerstone of the setnet fishery, and in particular, the early run was especially productive for this fleet – from 1990 to 2007, setnetters harvested 42% of their total sockeye before July 5, averaging 305,000 fish annually. In 2008, the early Karluk fishery dropped suddenly in productivity, and has failed to produce consistently ever since. Setnet fishermen are now averaging an aggregate harvest of just 90,000 sockeye before July 6.

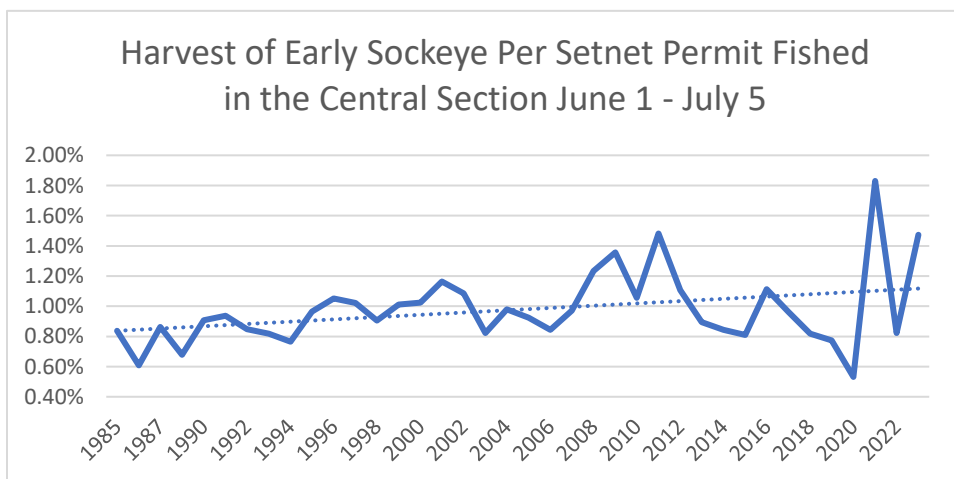


Figure 8: Individual setnet fishermen have captured a growing share of the early Karluk sockeye catch



During this early fishing period, sockeye harvested by both gear types in the Central Section has declined by 67%, and it has been over 5 years since total red salmon harvested in the Central Section exceeded 100,000 fish before July 6. Nevertheless, west side setnetters still typically catch the majority of the early-season sockeye in the Central Section. In fact, with a record low of 44 permits fishing, setnet fishermen still accounted for 65% of the early Central Section sockeye harvest in 2023, and the long term trend of total harvest per setnet permit has generally increased over time, as shown in the graph.

West Side setnetters have experienced an average reduction of 3,545 reds harvested per active permit during the period of 2008-2023 compared to 1990-2007. Most of that decline, roughly 60%, is attributable to the period from June 1 – July 5, during which they are catching on average 2,083 fewer sockeye per permit, despite remaining the dominant user group for this time period. This means that the decline of the early Karluk sockeye run, though still effectively harvested by the setnet fleet, accounts for the majority of the decline of their sockeye catch. This is not an allocative problem that has deteriorated their fishery – it’s a conservation problem, and the only solution is to continue to adhere to a management plan that focuses on managing the fishery to achieve

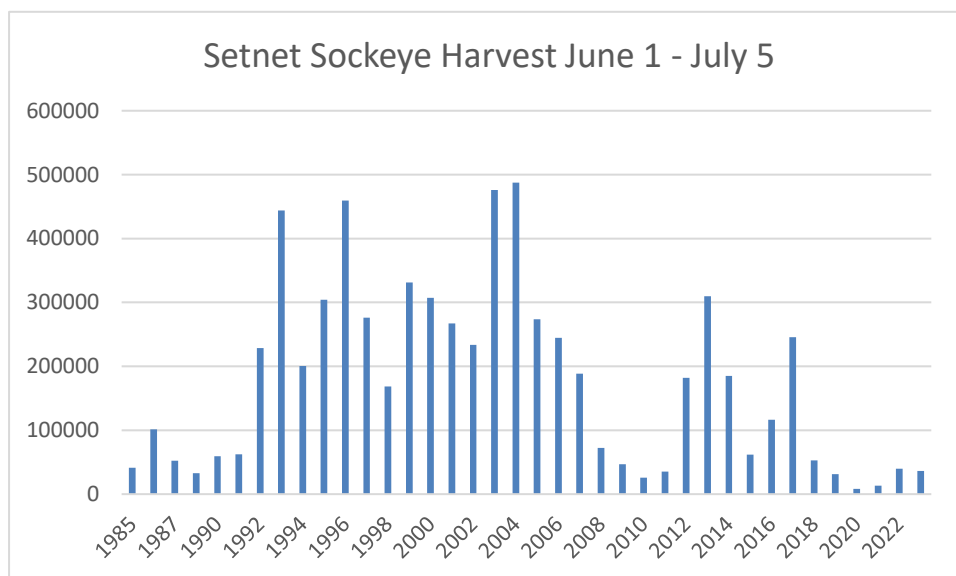


Figure 9: The decline the early-run Karluk sockeye fishery accounts for most of the decline in setnet sockeye harvest volumes in recent years.

escapement goals.

Without a significant early Karluk sockeye run, the distribution of sockeye harvested between gear types in the Central Section has returned to the historical levels that were typical before 1992. While late-run Karluk sockeye remain very strong, these fish do not tend to migrate through the bays of the Central Section to the same extent as the early-run. This migration pattern is very similar to the Chignik bimodal sockeye run – the early component approaches the lagoon predominantly from the north, while the late run favors a southward path.



Unfortunately, there are ecological headwinds that may inhibit a return to previous early Karluk sockeye run levels. The unusually dry summers of 2015 and 2019 resulted in the elimination of substantial portions of the early Karluk sockeye runs for those years, as these fish tend to spawn in the small upper tributaries of the Karluk river system. These higher elevation streams largely became dry during the arid summers, killing off spawning salmon and destroying fertilized eggs in the river beds. If Kodiak continues to experience such prolonged droughts, then the early Karluk sockeye run will remain at the relatively low levels we have seen in recent years, and setnet sockeye harvests will continue at levels that were typical prior to 1990. In this event, it would benefit the setnet fleet to refocus their effort on pink salmon. The fleet is currently capitalized and configured around a sockeye fishery that has largely failed to materialize consistently for the past 15 years.

2. Even-year Pink Salmon Fishery Collapse

After the record harvest of 15,150,000 pink salmon in the Central Section in 2006, the subsequent generation of fish failed to materialize. Despite the strong parent year, in 2008 the total harvest for both gear types plummeted to just 2 million pinks. With the exception of a decent harvest in 2012, even-year Northwest District pink runs still remain depressed. Preservation of even-year pink runs to the Northwest District should be of particular importance to the setnet fleet since these fish have substantially larger body sizes than odd-year fish, making them more amenable to harvest in setnet gear that is also targeting sockeye. On average, the share of pinks caught by setnetters on even years is over 20% higher than on odd years, likely due to larger fish body size.

The Gulf of Alaska is currently stuck in boom-and-bust cycles in odd and even years, resulting in substantially smaller fish size during the higher productivity odd-years. Since the many west side setnetters target sockeye and only incidentally harvest those pinks that are large enough to be captured in sockeye web, increasingly small odd-year fish are often unharvestable by many setnetters. At this year's Kodiak AC meeting, one setnetter declared that he doesn't even worry about pink salmon, since many of them just swim through his web. Even years, however, produce larger pink salmon and impact on setnet harvests is clear. Take 2016 for example, when the entire Gulf of Alaska pink salmon run collapsed, resulting in humpies that were similarly sized to sockeye – setnetters were able to harvest a near record 49% of Central Section pinks while only remaining on par with recent years' sockeye harvest percentages.

For this reason, it should be of paramount importance to setnetters to rebuild our even-year pink returns to the Northwest District. Unfortunately, setnet fishermen have largely advocated for managing the west side to provide maximum fishing time over optimal conservation and largely resist any conservation efforts that require them to stop fishing. At the 2020 Kodiak Board of Fisheries finfish meeting, the Board even approved a proposal from setnetters that allowed the Department to open the Central Section based on pink salmon escapement to the Karluk river, which is in the Southwest Kodiak District. There is no data or tagging studies suggesting that Karluk pink salmon migrate throughout the Central Section. Nevertheless, the approval of this proposal resulted in near continuous fishing in Central Section in 2022, despite relatively poor returns to the Northwest Kodiak District that required all of the inner bay sections to remain closed to conserve those fish. This management approach, as advocated for by the setnet fleet will delay the recovery of pink and chum stocks in the Northwest Kodiak District. The Board should also note that by closing



all of the seine-only inner bay areas while keeping the Central Section open conveys the entirety of the conservation burden of local stocks on the seine fleet.

Ultimately, if the setnet fleet wants to improve their pink salmon harvests the best approach would be to make a short-term conservation sacrifice supporting more conservative pink management of the Central Section in order to improve escapement, especially on even-numbered years when they are able to harvest the fish more effectively. In the absence of previous years' sockeye run volumes, this approach coupled with a refocus of their efforts on pink salmon would give their fleet the best opportunity to succeed in the fishery.

Additionally, the setnet focus shouldn't be on the percentage of pink salmon that they catch relative to the seiners – it should be on the *volume* that they harvest. Setnet pink salmon harvest volumes are inversely proportional to the percentage they harvest, when their percentage is high their catch numbers are typically low. Ultimately, the processors don't pay by the percent, they pay by the pound, and in order to improve poundage we need better conservation of pink salmon in the Northwest District.

Odd years – Lots of Little Fish

Overall pink harvests in the Central Section have declined by 29% for both gear types since 2008. As described above, even-year pink runs in the Northwest District have not recovered from the collapse that began in 2008 (Little River, is a notable exception. It has produced large pink runs on even-numbered years, however there are no longer any setnets regularly operating within 10 miles of this system). Over the past 15 years the Northwest District switched from even to odd year run dominance, and 2015, 2017, and 2019 produced above-average pink salmon harvests in the Northwest District. While setnet harvest volumes rose during these years, the increasingly smaller

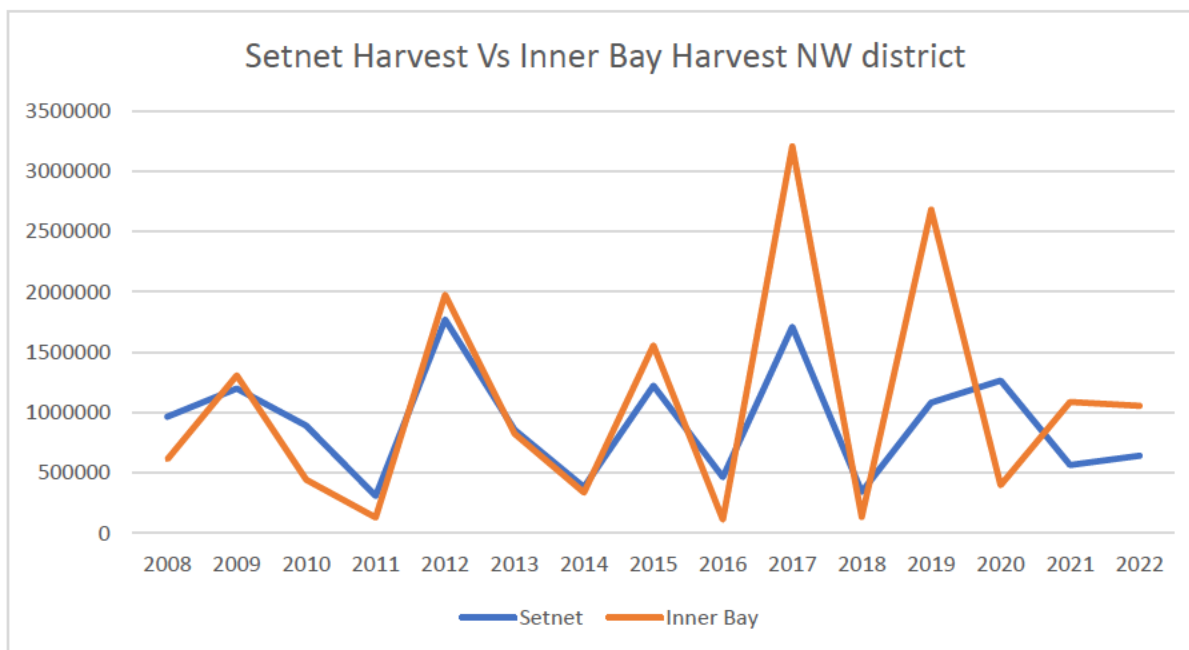


Figure 10: Inner bay and setnet harvests began to diverge in 2015, as algal slime and small fish plagued West Side setnet fishermen.



body size of these fish confounded setnetters who already operated under the inherent strain of a multispecies gillnet fishery.

The impact of small fish and algal slime is apparent when examining west side setnet harvests compared to harvests in inner bay sections of the Northwest District, as shown in *figure 10*. Fish have to pass through the Central Section and past all of the gillnets before making it into the inner bays. Typically, harvests in the inner bays correlated directly with setnet harvests prior to 2014, however on odd years, this pattern changed noticeably in 2015, 2017 and 2019 when inner bay harvests spiked dramatically while setnet harvests failed to materialize to nearly the same extent. Millions of fish simply migrated past and through the setnets without any significant increase in their harvests. Whether this is due to algal slime, small fish, low effort or a combination of these factors, it is clear that they were unable to harvest the fish that were available to them.

This is why efforts to allocate pink salmon to west side setnetters will be largely ineffective – they are already often unable to harvest the surplus fish available in the Central Section. Under these conditions, seine-only closures on the west side would largely serve to suppress the harvest of the seine fleet by many multiples more than it would improve the harvest of the setnet fleet. This not a terminal harvest, single species fishery, like in Bristol Bay or the hatcheries of Prince William sound; it is impossible to effectively allocate fish to the setnet fleet without substantially lowering overall yield from the fishery, resulting in numerous hardships for Kodiak's fishing families and communities.

Chum Salmon

Setnet chum harvest provide an ideal control group to understand how body size, run dynamics and algal slime have impacted the setnet fleet. West side chum runs peak much earlier than pink salmon runs and setnetters catch roughly 80% of their chum harvest before August 5, so algal slime impacts are far less pronounced for harvest of this species. Additionally, though chum body size may be somewhat smaller on average, they are still larger than reds, and so they will not be able to swim through gillnet web the way smaller pinks can. Finally, chum run dynamics have not changed as noticeably as have the west side pink and sockeye runs. Chum harvests have declined by about 19% during the last 15 years in comparison to the period from 1990-2007, a significantly smaller figure than the declines of pink and sockeye and indicative a relatively more stable fishery.

With these factors out of play chum harvests have remained remarkably stable for west side setnet fishermen. There is no noticeable decline for their gear type, as is evident in the charts below:

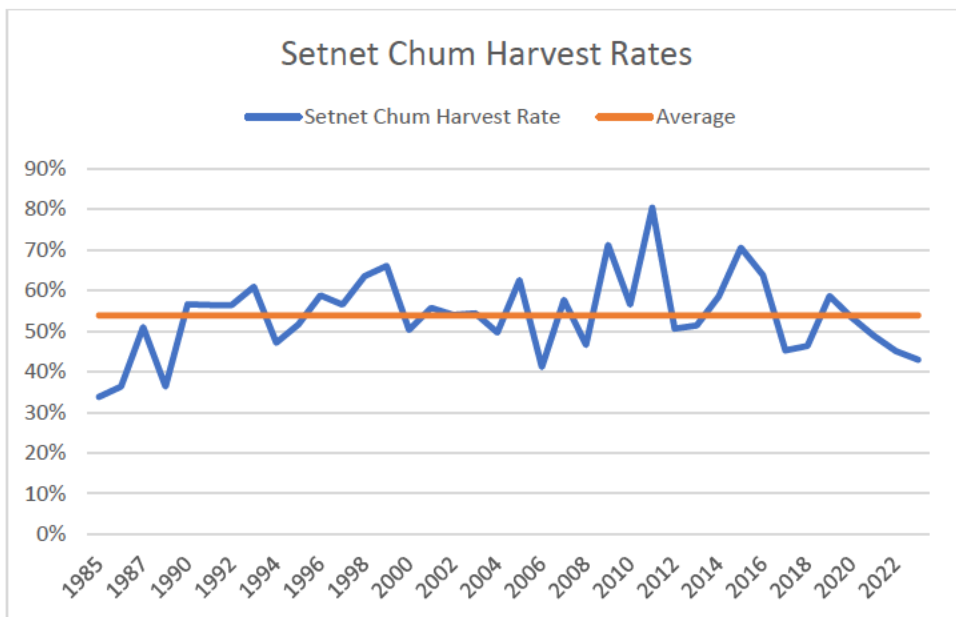


Figure 11: West Side Chum runs peak before the occurrence of algal slime and occur during the portion of the season that most setnet fishermen are choosing to fish.

It would entirely defy logic to conclude that seine fleet is somehow driving the decline of setnet sockeye and pink harvests, yet somehow, have not found a way to improve their chum harvests. The overly simplistic analysis provided in proposals 62 and 70 that purports that *because* seine harvest rates of pink and sockeye have increased they therefore *must* be the root cause driving the decrease in setnet harvests does not hold up to a rigorous analysis of this fishery. There is no way for that theory to somehow account for such steady setnet chum harvest rates, without

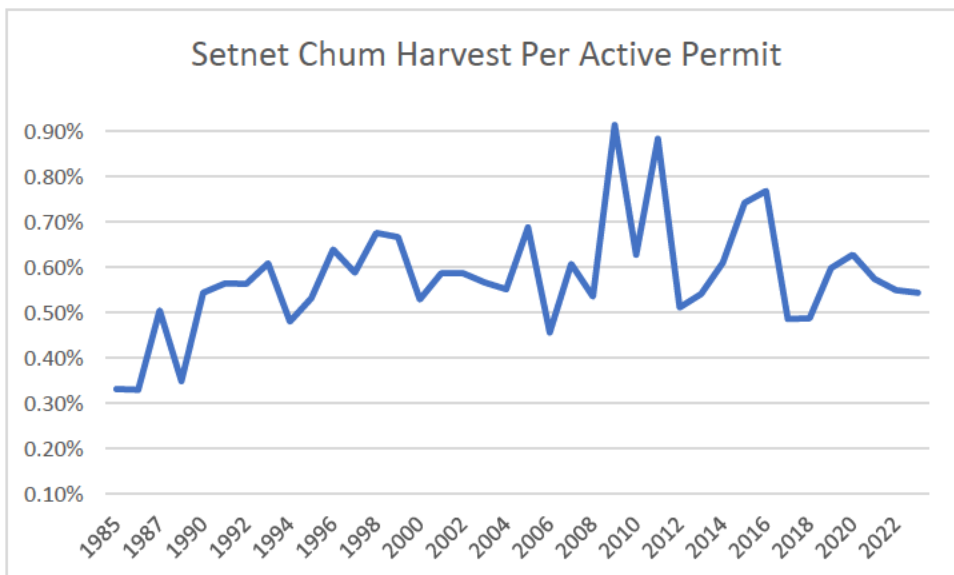


Figure 12: The portion of the chum harvest per active setnet permit has remained stable, since declines in body size and algal slime have less of an impact on the harvest of these fish.



completely defying basic logic. Instead, a multitude of factors have contributed to a changing west side fishery, and the allocative changes proposed in these proposals in no way addresses the underlying causes of their slow decline. Again, reduced participation, algal slime, small fish, even year pink collapse and a depleted early Karluk sockeye fishery are clearly culprits plaguing West Side setnetters.

What About Alitak?

The prevailing narrative proposed by setnetters that recent improvements in seiner efficiency combined with changes in seine harvest patterns has driven the decline of the setnet fleet is entirely unfounded. Seiners have fished the same sets with the same regulation nets, and largely the same vessels for decades, and most improvements to vessel operations simply work to make up for some of the lost harvest capacity generated by the absence of 200 additional vessels that once fished our area.

Nevertheless, Kodiak has another mixed gear type area, the Alitak District, that can be used as a control group to test the hypothesis posed by west side setnetters that changes to our fleet is somehow causing their declining harvests. ALL sockeye harvested by Alitak setnetters in this District must first pass by the seine fleet. If the fishing effectiveness of the seine fleet had improved to the degree supposed by the west side setnetters, then the Alitak setnet fishermen would see a decline in their harvest share. This has not happened. The graph below shows the annual harvests of seiners and setnetters in the Alitak District.

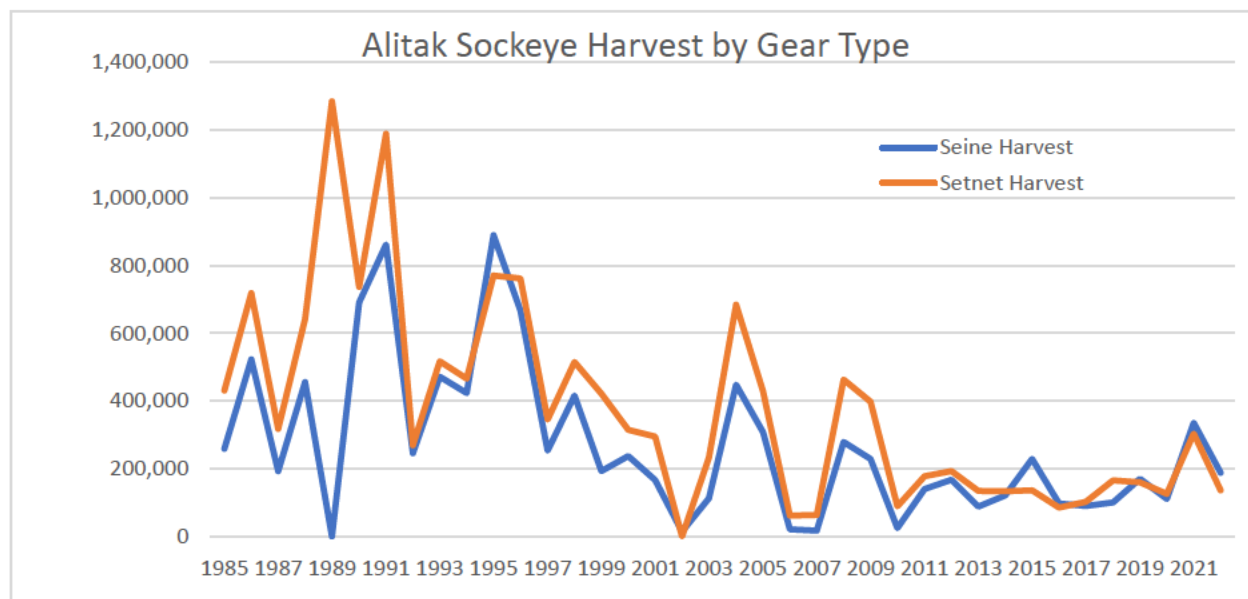


Figure 13: The distribution of sockeye harvests between seiners and setnetters in Alitak remains stable.

It is clear from the graph that there has not been a dramatic shift in harvest share between the two gear types. It should be noted that there has been a slight increase in seine harvest percentages,



however, lower overall harvest volumes has led to a substantial decrease in setnet effort, which, like in the Northwest District, impacts setnet total harvest volumes.

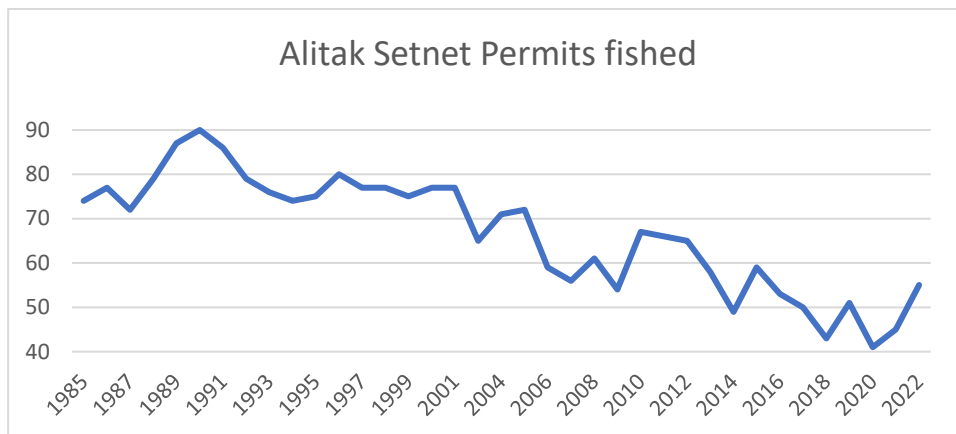


Figure 14: The number of active setnet permits operated in Alitak has declined dramatically in recent years.

When analyzing harvest per active setnet permit, there has actually been a steady *increase* in the proportion of sockeye harvested for individual setnet fishermen in Alitak:

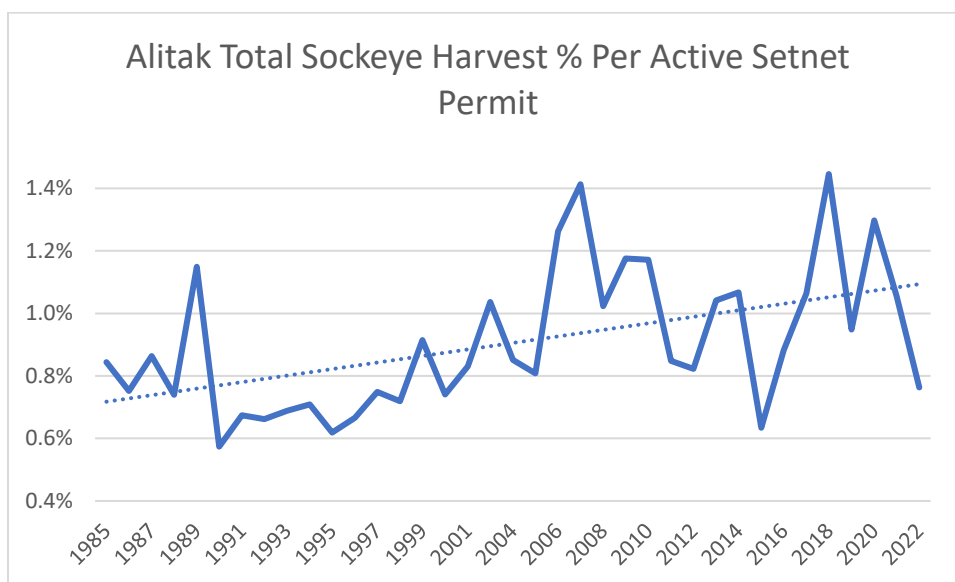


Figure 15: While the number of active setnet permits in Alitak has declined, the portion of the sockeye harvested per permit, including seine harvest, has increased.

This information alone should compel the Board and setnet fishermen to look beyond the seine fleet when analyzing the root causes of aggregate setnet harvests declines on the west side. It is an untenable argument to somehow claim that the seine fishermen in the Central Section have improved their harvest effectiveness in the Central Section meanwhile the Alitak seine fleet, which is



comprised of many of the same vessels that operate on the west side, has somehow failed to improve their vessel efficiency when operating in Alitak.

And Also Everywhere Else

If one were to believe that that recent improvement in seiner efficiency has resulted in a dramatic increase in harvest effectiveness to the degree that fishermen operating on the capes are essentially able to starve the bays of harvest, then this begs the question as to why pink and chum salmon harvests in the bays elsewhere on the Island have somehow not been impacted. Districts like the East Side, Alitak, Izhut Bay and Outer Kitoi have all seen sustained harvests deep in the bays, despite seiner activity on the capes that theoretically should be preventing fish from entering those bays. It again defies logic to claim that *only* Central Section seiners have improved their harvest capacity while every other District in Kodiak is operating with a somehow ineffective fleet.

Wasted Surplus

As explained above, west side setnetters with their reduced effort, focus on sockeye, and impacts of algal slime are simply not able to harvest the surplus salmon that they are asking to be allocated in the Central Section. Many of these fish, such as Karluk pink and reds do not necessarily even migrate through much of the Central Section, while the local pink and chum of the Northwest District are not even targeted by many setnetters who prefer to employ gillnet web sizes that better target sockeye.

Under proposals 62 and 70 many of the fish that seiners would be prevented from catching would go unharvested. While more fish would certainly pass to the inner bays, where seiners may be able to catch some of them, these are small management areas and are inadequate to provide for the full harvest of surplus stocks. Additionally, all of the inner bays have substantial pink *and* chum runs, and for the latter half of the season these areas typically only open when the Department believes there is a harvestable surplus of *both* species. For example, if the chum run to Zachar bay is weak, but the pink run is strong, local managers will close the Zachar Bay section when opening the Central Section, allowing for harvest opportunity on the more abundant pinks within the Central Section while providing an additional conservation corridor in the Zachar Bay section to protect the weaker chum stocks. In this way, the Department has been able to adeptly manage the Northwest District for sustainable yield of multiple stocks and multiple species by opening and closing inner bays sections while keeping the Central Section open.

The Inner and Outer Karluk sections of the Southwest Kodiak District are similarly managed for multiple stocks, but unlike the inner bays of the Northwest District, the inner and outer Karluk sections are in the Shelikof Strait and are often rendered completely unfishable for most vessels due to increasingly rough weather conditions. Depriving the Department of the ability to allow seine activity in the Central Section to harvest Karluk stocks would result in the same conflict in management goals for multiple species of overlapping run timing, but with the additional complicating factor of weather conditions preventing most, and often all, vessels from operating safely in these sections when the Department determines that there is a harvestable surplus. The



result would be choosing between the untenable choice of over escaping the Karluk sockeye system or allowing excessive pressure on potentially weak pink, coho or chinook stocks, both entirely undesirable and unacceptable outcomes. Also, the Board should consider the allocative implications within the seine fleet of forcing fishermen to focus their harvest efforts exclusively in sections that do not provide adequate protection for the numerous smaller vessels that operate almost exclusively in the more protected areas within the Central Section. Many of these smaller vessels belong to up-and-coming fishermen who are getting their start in the fishery and would be adversely impacted.

Finally, the Central Section itself contains numerous salmon streams that are far outside of the inner bay areas. Little River, Campbells Lagoon, and the streams of Viekoda Bay are among the salmon systems that can produce significant volumes of fish that the setnet fleet would be unlikely to catch. These systems can aggregate to hundreds of thousands of fish that would likely go unharvested under proposals 62 and 70. Little River, in particular, which is one of the largest salmon systems on the west side, is located near Cape Ugat in the Shelikof Strait, roughly 10 miles from the nearest regularly operated setnet site. When algal slime, small bodied pinks or other conditions combine to reduce the harvest efficacy of setnet fishermen, then these runs would simply be wasted, further contributing to already reduced yields that would result from the allocative proposals of 62 and 70.

Ultimately, proposals 62 and 70 hamstring that Department's ability to manage the Northwest District and the Karluk fishery for sustained yield, especially when considering co-management of multiple species simultaneously. This reason alone should be sufficient for the Board to reject these proposals, as the sustainable salmon policy must underpin any management plan within the state.

Unintended Allocative Impacts

Every change to a management plan will result in unintended consequences, and proposals 62 and 70 are no different. Kodiak is a large management area, and most boats specialize in fishing small portions of the KMA. The Central Section is the largest management section with the most fishing opportunity and largest overall harvest volumes. Many boats focus their effort in some portion of the Central Section. In particular, the resident fleets of the remote villages of Port Lions and Larsen Bay, along with the last two seiners from Ouzinkie spend much of their time fishing this section. None of these communities were consulted when proposals 62 and 70 were crafted despite the fact that their implementation would most acutely affect the vessels operating out of these ports. These communities are located *in* the Central Section and passage of these proposals would largely disenfranchise their fishermen of traditional fishing opportunities in their home regions.

The Alaska Board of Fisheries has historically failed to acknowledge that Kodiak is home to 6 remote Alutiiq villages that are highly dependent on access to local fishery resources. 5 of these communities, Port Lions, Larsen Bay, Akhiok, Old Harbor, and Ouzinkie, engage actively in Kodiak's salmon seine fishery. Kodiak's total fleet has been more than halved since the decline in salmon markets in the 90's, while the fleets of these villages have experienced an even higher decline in participation. Before passing any proposals that would reduce fishing opportunity in the Northwest Kodiak District, the Board should be sure to consult the residents and tribal leaders of the three



villages located in this area to assure that the changes would not further deteriorate their resident fleets.

Additionally, the Northwest District is home to the most protected fishing grounds which provide the most consistently safe fishing opportunities for Kodiak's small vessel fleet. Unlike Area M, Southeast, and Prince William Sound, Kodiak is still predominantly a small-boat fishery with many vessels under 50' most of which were built in the 70's and 80's. Closing the Central Section to seining would disproportionately impact these smaller vessels that often cannot safely travel to other areas or operate in the southwest Kodiak District, which is entirely exposed to the Shelikof Strait. Recent trends of increasingly inclement weather have displaced many vessels from the traditional cape fisheries and into the bays. Proposals 62 and 70 would have the unintended consequence of diluting the harvest opportunities of small vessels in the inner bays, when they are even open, or forcing these vessels to make the decision to either stop fishing during seine-only closures or risk traveling through and fishing in rough weather conditions. The inevitable result would be an allocative shift within the seine fishery to larger vessels that can handle fishing in rough weather or travel safely to other fishing grounds.

The Problem with Staggered Openings

In addition to seine-only closures, the implementation of staggered openings during in-season management is problematic from a management standpoint. This would mean that when the Department observes a surplus of harvestable stocks in the Northwest District, then, when accounting for the 24-hour mandatory advance notice for any opening in the KMA, there would be a minimum of 72 hours before the seine fleet would be able to access those stocks in the Central Section. Many of these fish would just migrate through the Central Section to their natal streams and go unharvested. No fishery in the state can be properly managed for escapement when imposing a mandatory 72-hour lag time to fishery openings for the primary gear type, especially in a mixed stock, non-terminal fishery. This aspect of proposal 62 will result in excessive waste of fish, especially after July 13th, when in-season management transitions from scheduled openers to purely escapement-based management.

Advance openings could be possible in June and early July, but the Board should be aware that limitations on harvest in the Central Section increase the possibility that inner and outer Karluk will be opened to control escapement, which in turn returns the Department to the dilemma of managing overlapping stocks at Karluk, as the recently declining Chinook runs overlap in June with the early Karluk run. Once again, the Department could be left with the decision of either over-escaping Karluk, or placing excessive pressure on weak Chinook stocks.

In Conclusion

Proposals 62 and 70 fail to address the primary causes of declining harvests for west side fishermen. In terms of the *percentage* of fish harvested by setnet fishermen, improvements would best be made through changes to their own fishing operations. Setnetters need to fish more days and a larger area if they wish to increase their harvest percentages. The effort put forth by setnet fishermen is entirely within their control and before asking to curtail the fishing activity of another

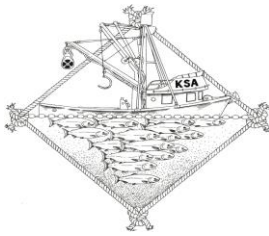


user group perhaps they should simply exploit more of the harvest opportunities that are available to them. Otherwise, how could the Board of Fisheries effectively allocate harvest to a gear type based on a harvest rate that resulted from an effort level that they no longer put forth? It is clear that when they actually fish, and when algal slime is not present, that setnet fishermen are just as effective as they had been in the past, and are in fact harvesting a *higher* share of the fish when their gear is actually in the water, however, with fewer of them fishing, and most of them choosing not to fish for much of the season, it is no wonder why their aggregate share of the catch has declined.

However, if instead of fixating on the *percentage* of fish that they harvest, west side setnet fishermen were to focus on the volume of fish, which is what really matters, then the focus should be on better conservation of Northwest District stocks, and the continued conservation of early Karluk stocks. And while west side setnetters may claim that seine only closures would improve conservation, the truth is that the seine fleet always has and always will focus their efforts on abundant stocks and move away from weak stocks. As a result, when, say, Terror and Uganik Bay pink stocks are weak, and the inner bays in these areas are closed, the only remaining fishermen operating anywhere near these systems are setnet fishermen, who fish the same sites no matter the strength of nearby runs. As a result, even though setnet fishermen typically only harvest 15-50% pink stocks, they are the primary source of harvest pressure on weak stocks, and so any attempts to conserve Northwest stocks must involve Central Section closures to *both* gear types in order to be effective. Additionally, without a return of the early Karluk run through continued escapement-based management and conservation, west side setnet fishermen will not be able to return to their harvest volumes of 1990 to 2007.

Ultimately, proposals 62 and 70 would seriously inhibit the ability of the Department to manage for sustained yield for multiple overlapping species migrating to the Northwest District and the Karluk River system. This reason alone should be sufficient for the Board to reject these proposals on constitutional grounds, as the Department has made it abundantly clear they cannot effectively manage this area while encumbered by purely allocative restrictions that prevent the harvest and conservation of multiple overlapping stocks.

These proposals would necessarily result in reduced overall harvests in the KMA, and a resultant economic loss to our fishermen and communities. The negative economic impacts would propagate through the town, harming not only local fishermen, but processors and shoreside businesses that rely in the steady flow of income to Kodiak's fishing fleet. Kodiak is not a region that can afford to squander the fishery resources that our communities rely so heavily upon, and so **we ask the Board to please reject proposals 62 and 70, in order to provide our regional fishing communities with the greatest opportunity for cultural well-being and economic prosperity.**



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 26, 2023

To the Alaska Board of Fisheries,

The Kodiak Seiners Association (KSA) **opposes proposal 67**. Minimum escapement goals should be set by the department based on scientifically determined sustainable yield considerations, not based on the arbitrary and unrealistic standards of single individual. While we understand that the salmon systems running through the population centers of Mat-Su valleys have very high in-river use, the same is not true for the remote streams of Kodiak. The commercial fishing fleet is by far the primary user group for the Ayakulik river by every measure available – number of users, economic productivity, historical dependance, etc. The current escapement goals provide more than ample recreational fishing opportunity for the few individuals who are able to travel to this remote area to fish. In addition to the tens of thousands, if not hundreds of thousands of sockeye that are available *per user* at any given time in the fall, there are typically many thousands of coho also available per angler. This isn't an area with combat fishing for limited fish like on the Kenai, this is the Ayakulik.

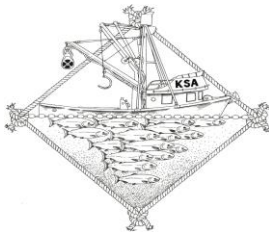
Additionally, this unrealistic minimum threshold is set long before the peak of the generally unpredictably timed coho run, and would likely never be met. Although the inner Ayakulik section virtually never opens in the fall, there is the possibility that excessive pink or sockeye numbers would provide for a short opening to this area and the department should have the ability to manage for these stocks.

After August 25th, the Ayakulik system is managed exclusively for Coho and inner Ayakulik never opens during this period anyways, since operation of the weir is generally untenable late in the season due to high water, pink carcass wash-out, and, more than anything, insufficient department funding to maintain a weir for coho. As a result, the only opportunity for seiners harvest coho is in the *outer* Ayakulik section, which is already managed conservatively allowing for at most one 77-hour weekly opening.

KSA would also like to correct for the record some of the misconceptions conveyed in the justification language for this proposal. First of all, there are no set gillnets operating in the Southwest Kodiak district, they operate only in the Northwest Kodiak District and the Alitak District. Also, seiners do not fish "wide open" at the Ayakulik in the fall. As mentioned previously, this area is already conservatively managed for sustainable coho escapement, and in recent memory to the river mouth during the coho season. And finally, the Ayakulik is *not* a vital system for subsistence use. It is



a remote salmon system with no year-round population and only a handful of guides operate here for the few wealthy clients who can afford to travel to this remote area.



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 26, 2023

To the Alaska Board of Fisheries,

The Kodiak Seiners Association **opposes Proposal 68**. The Karluk system *does* have a management plan for coho on the Karluk River, and this system has historically been managed conservatively for these fish. Coho management on the Karluk begins on September 5th, which is well before the peak of this run. Seiners don't generally fish "wide open" here after mid-September as claimed in the proposal, and in fact in 2022, in order to conserve coho, inner Karluk *never* opened after September 5th, and even outer Karluk was restricted to just 54-hour weekly openings to harvest sockeye. In 2023, conservation of coho also resulted in limited weekly openings in the inner Karluk section of just 54 hours.

Karluk needs to be managed for both coho and sockeye in the fall. These arbitrarily imposed minimum escapement thresholds would rarely be met. Lack of Department funding and, on even years, pink salmon carcass washout now prevents the weir from being operated very long into September, so the likely outcome of this proposal would be to close the Inner Karluk area to seining for the entirety of the fall which would result in the chronic over-escapement and subsequent collapse of the Karluk sockeye fishery.

The Karluk drainage houses some of the most optimal and pristine sockeye spawning habitat in the state, which is why such a small drainage and lake system is capable of producing an incredibly high density of fish that all rear in the Karluk Lake. This makes this system particularly susceptible to the pitfalls of over escapement, as smolt population booms can lead to over-grazing of plankton in the Karluk Lake, essentially starving all rearing fish. The last time the Karluk River collapses it took over 50 years to restore the run to its productive potential. This proposal is short-sighted and promotes an overly simplistic and generally false depiction of how fishery resources are managed in Kodiak.

Also, despite the proposers claims, setnets are not operated in the Southwest Kodiak District, which includes the inner and outer Karluk sections.



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

Re: Support for proposals 60, 66, 72, and 73

Dear Chairman Wood and Board of Fisheries members,

Proposal 60

The Kodiak Seiners Association asks the Board for consideration of Proposal 60 which would allow up to 48-hour extensions in areas on the mainland exhibiting strong returns of local pink and chum salmon.

In 2020 the Board of Fish took action to curtail fishing efforts in the mainland section of the Kodiak management area, with the sole focus on the limitation of harvest of sockeye in these areas, yet as a result, the department has its hands tied in managing for maximum sustained yield in the mainland areas where large runs of pinks and chums go largely unharvested during the mid to late July time frame. The mainland section of Kodiak prior to 1989 supported canneries and up to 50 vessels a summer on the pink salmon and chum salmon runs alone. These runs have been in a state of rebuilding ever since 1989 due to the decimation of those runs by the Exxon Oil spill, and in recent years have exhibited larger abundances of early pinks and chums.

In addition, the Kodiak fleet is comprised of a significant number of vessels that were built in the 1980's and weather patterns in recent years has made crossing the Shelikof Strait a gamble for those boats wishing to branch out and get away from the nucleus of the salmon fishery; the Central section. Allowing the department flexibility to manage for local mainland stocks and extend openers based on abundance of pinks and chums would allow greater opportunity for our fleet to cross the Shelikof, without fear of getting stranded by weather and wasting excess fuel.

Proposal 66

KSA requests Board support for the proposal to remove the requirement for 7-inch lead web and allow for a seine to be 250 fathoms in length.

Kodiak is currently the only area in the state with the 7-inch lead web requirement, a relic from a time period when seine fishermen fished detachable leads and the concern was that the detached portion could be used to fish illegally in creeks or other closed waters. Every vessel that currently fishes Kodiak uses a sewn-in lead and therefore the requirement for 7-inch mesh no longer applies to an existing regulation concern. Allowing the seine fleet to utilize traditional 3.5-inch seine web in place of the current required web would serve 2 distinct purposes:

1. Cost:

As every salmon net in the state uses 3.5" seine "body" web, lightly used body web could be recycled into the lead section of a seine saving the user thousands of dollars



in replacement of lead web. Given the current economic climate of the fishing industry, any savings on gear would be highly valued.

2. Safety:

Depending on the direction fish are travelling, up to 50% of the traditional seine sets around the island necessitate fishing with the seine boat close to the beach. For deeper draft heavy boats, this increases the risk of touching bottom while towing on the net. Many operators will “switch around” and fish with the skiff close to the beach to keep the main vessel farther away from the shore, however for some, the ability to “switch seine direction” isn’t a reality.

Proposal 72

KSA asks the board support this proposal as it is a small change that should have been made back in 2020 when the Westside Management Plan in the Kodiak area was changed to allow the Central section to be managed for pink salmon returning to Karluk as well as pink salmon returning to systems within the Central section. For context The Southwest Afognak section of the Kodiak management area has always opened with the Central section for pink and this proposal would maintain that consistency.

Proposal 73

Proposal 73 seeks to allow some flexibility for the department to manage the Sturgeon River section of the Southwest Kodiak District based on pink salmon returning to the Sturgeon River during even years when pink salmon returns have shown to be strong. Currently, this section is managed on even years for pink and late run sockeye salmon returning to the Karluk River.

In the last two even years, 2020 and 2022, the Sturgeon River has experienced an increase in run strength of pink salmon. Currently under regulation this section must be managed for late run sockeye returning to Karluk and pink salmon returning to Karluk, with no ability for management to open or close this section based on pinks returning to the Sturgeon River.

For the time period of July 16th-August 24th in 2020, pink salmon harvest in the Sturgeon section was approximately, 1,031,770 pinks with a total estimated escapement of over 1.5 million pinks, and in 2022 pink salmon harvest was approximately 834,862 pinks with escapement estimated at 800,000.

It is our intent that allowing harvest opportunity in the Sturgeon river section in even years when an abundance of pink salmon exists for both the Karluk and Sturgeon rivers would give the seine fleet opportunity to spread out and fish in a non-gear conflict area that has historically been opened when only Karluk pink salmon returns are strong.

We recognize the department’s concern with this proposal and providing protection for late run sockeye returning to Karluk, and are open to any language changes that would alleviate the department’s concerns regarding sockeye.



Submitted by: Saron Kojin

Community of Residence: Homer AK

Comment:

See attached

Proposal 54: Oppose

Proposal 55: Support



Submitted by: David Kubaik

Community of Residence: Kodiak, Alaska

Comment:

I will address only proposals I feel particularly passionate about. They are as follows.

Proposal #57. Support. It is about time the herring harvest regarding the wasted sac roe fishery and the potential food herring market were addressed. It is all the same resource and dividing it into sac roe or food/bait is a false dichotomy. #57 does a good job of balancing out these issues and potentially opening up market possibilities.

Proposal #62. Oppose. The changing climate has caused disruptive patterns in the migration of salmon. Warmer waters have caused thick algae blooms. Changes in the production of various salmon streams no longer monitored by ADFG with pre-emergent surveys have shifted salmon concentrations. Set salmon gillnet crews are no longer easily hired due to diminished catches and ex-vessel values. The fact that set salmon gillnets are no longer a very effective or efficient way to harvest salmon in traditional sites around Kodiak Island will not be saved, salvaged, or relieved by more time wishing for fish to hit, algae to disperse, or prices to rise. More time to soak ineffective gear will simply mean salmon will pass by and not be harvested in an orderly manner.

Proposal #63. Oppose. In many ways this proposal is an attempt to likewise relieve the issues Proposal #62 tries to fix. It is not going to cure the changes that shifting environmental regimes are causing to a fixed entity in a changing world. "The gear isn't working, so we need more." Fewer and fewer operators with more and more gear is not a prescription for efficiency or production.

Proposal #65. Oppose. If one were to fly from Kodiak to Akhiok via Larsen Bay and, paying attention to the world below them, mention what they had seen on the way, they would be violating the law under this proposal. "I saw boats working off Green Banks," could start your court experience. This proposal is as unnecessary as it is unenforceable.

Proposal 52: Support	Proposal 53: Support	Proposal 54: Oppose	Proposal 55: Support
Proposal 56: Oppose	Proposal 57: Support	Proposal 58: Support	Proposal 60: Support
Proposal 61: Support	Proposal 62: Oppose	Proposal 63: Oppose	Proposal 65: Oppose
Proposal 66: Support			



Submitted by: Pavel Kusnetsov

Community of Residence: Homer

Comment:

YES FOR PROPOSALS #52 #54 and

I dont agree taking away from small guys to favor big boats so No for proposal #54...

And YES for proposal #55

Proposal 52: Support	Proposal 53: Support	Proposal 54: Oppose	Proposal 55: Support
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PC78

Submitted by: Laurenti Kusnetsov

Community of Residence: Homer, ak

Comment:

I'm against big corporations let the small guys be able to feed they're family's

Proposal 52: Support

Proposal 53: Support

Proposal 54: Oppose

Proposal 55: Support



PC79

Submitted by: Dia Kuzmin

Community of Residence: Delta junction

Comment:

Hello board members

I submitted proposal 53 to allow longlining slinky pots in kodiak state waters for p.cod. I had the same proposal for cook inlet which for some reason wasn't on the agenda. My ask is to amend this proposal to a state wide proposal if possible if not add cook inlet. Thank you

Proposal 52: Support

Proposal 53: Support

Proposal 54: Oppose

Proposal 55: Support



PC80

Submitted by: Domian Kuzmin

Community of Residence: Delta junction AK

Comment:

I oppose against proposals 54. Why are big boats trying to take all the fishery away from small boats. Soon there is gonna be no fishery for little guys.

Proposal 54: Oppose

Proposal 55: Support



PC81

Submitted by: Faliley Kuzmin

Community of Residence: Homer

Comment:

That's the most [absurd] thing, cod starts showing up on shallows end of March

Proposal 54: Oppose Proposal 55: Support



PC82

Submitted by: Leontey Kuzmin

Community of Residence: Delta junction

Comment:

I'm against big boats and corporate taking away the ability from the small boats to feed there families

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



PC83

Submitted by: Samson Kuzmin

Community of Residence: Delta junction A.K.

Comment:

I do not support the pot purposal.

Proposal 54: Oppose Proposal 55: Support



PC84

Submitted by: Fierce Kuzmin

Community of Residence: Homer, alaska

Comment:

This is stupid people only start fishing in march. & why no heads up on this proposal?

Proposal 54: Oppose Proposal 55: Support



Submitted by: Alexis Kwachka

Community of Residence: Kodiak, Alaska

Comment:

Chair Van Dort and members of the Board of Fisheries,

My name is a Alexis Kwachka I hold 3 limited entry permits, two for Kodiak waters and one for Bristol Bay. I am opposed to proposal 63. Permit stacking will lead to consolidation and without any study to even determine what the criteria of success or failure is? I respectfully ask you to oppose this action.

Limited entry permits afford an individual an opportunity to fish, fishing comes with no guarantee of success or failure. The State of Alaska demands active participation and this has been a success. Permit stacking decreases the permits available for next generation fishermen to purchase. Many studies have been done on the greying of the fleet and the lack of new entrants entering fisheries, this action will exacerbate an already defined issue.

Permit stacking is not done in a vacuum of just one fishery, each fishery that is allowed to stack will then excite the next fishery to ask for the same benefit. My case in point is that at almost all cycles now we see some sort of stacking proposal come before the Board of Fish.

During the last setnet stacking experiment we saw an influx of setnet fishermen move to Bristol Bay. That is everyone's right to do, I have no problem with competition. Where I really have a problem is when one individual can stack a permit into a child's name, wife's name, mother, father, family member, whomever's name and derive an income from that permit while competing against me. I have a serious problem with this. The reason being is because at the next cycle they will be coming before the Board of Fish asking for you to allow two permits to be allowed to fish under one individual. Permit stacking can/will lead to further consolidation. One fishery at a time.

Opportunity is a funny thing, one persons failure is another's opportunity. I bought into Bristol Bay during the last salmon upheaval. We had just come through salmon restructuring where permit stacking originated. Salmon prices were at an all time low market conditions were in the gutter and I bought. I took advantage of a bad time and took the risk and going for it. It has turned into half of my life fishing Bristol Bay. This season was my worst season I've ever had, but next season will be better. Any sort of consolidation that would have changed active participation would have taken half my fishing career in Bristol Bay away from me.

No matter the times active participation is pure and as protective of healthy coastal communities as you can get. One permit one fisherman, if you do decide to move forward with a proposal like this please tie the two fishermen together to both be actively participating with the harvest.

Also I think you should consider an:

- * optimum number study
- * understanding of already consolidated sites
- * criteria of success or failure of stacking
- * reconsider the bar a permit stacking proposal needs to meet before being elevated to an actionable item.

Thank you very much for your time and consideration of my thoughts. During these tough times for all of us in almost all of our fisheries, "less is not more"

Alexus Kwachka

Kodiak, Alaska

Proposal 63: Oppose



PC86

Submitted by: Cristina Lingvay

Community of Residence: Miami, Florida

Comment:

I am a fisheries management and conservation graduate student at the University of Miami Rosenstiel School of Marine, Atmospheric and Earth Science. As someone who studies fisheries management, it is my prerogative to be involved in changes regarding the management of fisheries throughout the United States, regardless of State of residence. I understand that fisheries management decisions greatly affect harvesters, who should be at the forefront of consideration to fisheries management changes along with the sustainability of the fishery.

The following include my comments and concerns regarding the proposed changes to the Kodiak Area Commercial Herring Fishery, which includes changes to Title 5, Alaska Administrative Code (AAC) 27.510 Fishing seasons and periods for Kodiak Area. There are two differing proposed changes to this regulation, which were introduced as Proposals 56 and 57 under the "Notice of Proposed Changes in the Regulations of the Alaska Board of Fisheries" on October 20, 2023.

Proposal 56

This proposal seeks to change the fishing season and periods for the Kodiak Management Area to increase commercial herring fishing opportunity by modifying (a)(1) above to the proposed regulation for (a)(1):

(1) Fishing periods for purse seines are from 9:00 a.m. until 9:00 p.m.

Proposal 57

This proposal offers a different change to the same regulation defined in Proposal 56 as follows:

(a) Unless provided for by emergency order, herring may be taken during the herring season from April 1 through Dec 31 as follows: A season, April 1 through May 15. B Season, October 1 through December 31.

The current fishing restrictions for pacific herring are undeniably complicated, going so far as to change by hour increments based on whether the day is even-numbered or odd-numbered and what month it is. As it currently reads, the regulation increases the potential for mistakes to be made in good faith, placing an undue burden on fishers. The individual who submitted Proposal 56 comments that the current operating hours are an "awkward artifact of the past" when there was less coordination between harvesters, processors, and ADFG. Additionally, the gillnet fishery in "all practicality no longer exists", increasing the potential for purse seine fishery harvest, and the regulation should be updated as such. The extension of daily fishing periods would facilitate a more orderly fishery, providing fishermen with more time to focus harvest on higher-quality fish. Lastly, the proposed change does not alter ADFG-designated harvest volume and biomass and does not seek to increase exploitation rates. While this proposal would greatly simplify the allowed times for purse seine fishing, it still substantially increases the period of allowable fishing without properly addressing potential over-harvesting

concerns that come with allowing more time for harvesting. The proposal fails to quantify the decline in the gillnet fishery to justify the proposed increase of purse seine fishing.

The individual who submitted Proposal 57 provides slightly different reasoning for their proposed changes, stating that the sac roe market for herring has been in decline, while current demand trends for canned, pickled, and smoked herring require herring harvest to take place when the herring is in its high fat stage of life 5-6 months past spawning. This is reflected in why the writer chooses to replace “sac roe” with “herring” in Proposal 57. The proposer cites the 2022 Study of North Sea Herring to advise the needs, uses, and market placement of the Kodiak fall herring of Proposal 57; but upon inspection, this document is a market study conducted by the Alaska Seafood Marketing Institute, and does not address the stock and estimated biomass production of pacific herring as is standard in fisheries management decisions, but rather investigates the market and perceptions of harvesters, processors and consumers of European Atlantic herring. This document is inappropriate to use in regulations pertaining to an entirely different species of herring and should not be used to justify why the herring season should be extended by 6 months and the regulations on allowable daily hours removed. The proposer offers no scientifically backed justification on why the herring season should be expanded as far as it is proposed.

It cannot be denied that the current regulation on purse seine herring fishing is convoluted and confusing. If current market trends are indeed changing towards demand for adult herring over sac roe, and the allotment for gill-net herring fishing can be better utilized by purse seine fishers, there may be a better method of regulating pacific herring. Moving the herring season to late summer and fall would also allow for additional recruitment of herring to the population, since roe would not be harvested. However, neither proposal sufficiently addresses the management concerns associated with such a change.

I propose that the amount of herring biomass that goes unharvested by gill-net fishers within the past 5 years should be quantified and assessed, and the allotment of biomass for each fishery should be reevaluated according to the findings. Additionally, market trends and demand for different herring products should also be studied to justify changing the herring season from spring to fall. Not only would this change more efficiently address demand for herring and reduce undue burden on fishers from convoluted regulations, but this change would also allow higher rates of recruitment for herring, ultimately benefitting the herring population and provide greater support for the north Pacific marine food web.



PC87

Submitted by: David Little

Community of Residence: Village Islands, Uganik Bay, Kodiak, Alaska

Comment:

Dear Board of Fish Members,

I am writing you regarding the Kodiak salmon proposals. My name is Dave Little and I have been setnetting in Uganik Bay on Kodiak's west side since 1984. I seined in Kodiak for a couple of years prior to that. I live in Village Islands, a small community in the bay, and everyone in the community is connected to the salmon fishery. Obviously, I'm not young but there are young people who are working hard to make a living and make payments on their fishing operations. My crew members are typically young Alaskans from the interior. It is evident that setnetters on the west side have been catching a decreasing percentage of the overall area catch. I am supporting simple proposals that may help mitigate these losses while having minimal impact on local

seiners, many of whom are my friends and neighbors. These proposals are as follows. Proposal 62 gives an advanced opening for setnetters under certain situations and while it states 48 hours I would be content with 24. Number 64 regards to hook size, the configuration at the outer end of our nets, increasing it from 25 to 50 fathoms. It will likely lead to a slightly more workable hook which would be convenient. And I support proposal 71 regarding outer Karluk. I am opposing proposals 72, 73, and 74 which will make it more difficult for us to be productive. Lastly, I have thoughts regarding a couple of other proposals. With number 63, I think a setnet fisherman having two permits will have minimal if any negative impact and could be helpful for a few people. Proposal 66, which will effectively increase seine length, will likely be a convenience for seiners, perhaps save them a little money, and minimally increase their catches. I don't oppose this proposal, but perhaps some increase in our net length would be in order (e.g., 25 fathoms).

In summary, it has become increasingly difficult for many Kodiak salmon fishermen to make a living, particularly west side setnetters, and I am hopeful that some simple changes that might help us make ends meet without having significant impact on other gear types.

Thank you for considering these issues, and for your hard work.

Sincerely,

David Little



COMMENTS REGARDING BOF PROPOSAL #57, KODIAK HERRING

I AM OPPOSED TO THIS PROPOSAL.

I hold a CFEC limited entry permit in the Kodiak food and bait (F&B) herring fishery, issued to me for my historical participation in the fishery prior to the time the Entry Commission determined a need to limit the number of permits after public hearings and deliberations. The number of permits was determined after careful analysis of the resource and the harvest capability of the fleet. In the final seasons prior to limited entry, there was an increase in the number of boats fishing and ADF&G food and bait herring Managers found it difficult to control the harvest, in part because they lacked resources to monitor the catch from the fishing grounds. That same lack of resources exists now, with ADG&G soliciting bids for F&B herring to generate revenue for the Department (*see Advisory Announcement, Food and Bait Fishery Update # 01, dated 10/3/23*).

Since the adoption of limited entry, ADF&G Kodiak herring Managers have continued to be concerned about over harvesting of herring stocks and have not allowed a competitive fishery for food and bait permit holders. As an alternative, the nine permit holders have been allowed by ADF&G and CFEC to form a co-op (*see Kodiak Area Herring Fisheries Annual Report number 19-30*), under which fishery Managers have seemed more comfortable in their ability to prevent exceeding the GHF during the open period of September 1-February 28 of each season, and as a condition of opening the fishery, they have insisted on the consent of all permit holders to a combine and that only one catching vessel operate.

During these combine years of the fishery some of the initial recipients of limited entry permits, who had taken turns as the catching vessel, apparently found it more profitable to sell those permits and leave the fishery. It is noteworthy that the author of this Proposal 57 was awarded a F&B herring permit at the inception of limited entry, had the opportunity to develop a food market as an active participant, but instead sold that permit.

Food and Bait permit holders welcome any food marketing contacts or information from ASMI or any other source, however, up to this point fall herring has been given out over the years to promote food markets without any actual sales resulting, mainly due to prohibitive processing and shipping costs.

This proposal is a bit vague about who would be allowed into a "B" season, however, if any Kodiak sac roe herring purse seine or gillnet limited entry permit holder were to be allowed to fish in the F&B fishery it could potentially make the fishery unmanageable. Again, ADF&G has insisted on our limited entry F&B fishing to be undertaken only under a co-op with only one catcher boat.



Kodiak herring permits, both sac roe and food & bait are limited entry, and they have been bought and sold. This proposal, if passed, would devalue *F&B* permits and increase the value of sac roe permits.

It would not be fair or equitable to increase the number of permits allowed to harvest food or bait herring without going through the process of petitioning CFEC for analysis and subsequent hearings.

This proposal requests that the BOF make drastic changes to the herring fishery and reallocate portions of the GHL from the sac roe fishery into a fall food fishery. Absent is any mention of the fall bait fishery. If roe permit holders were also allowed to harvest bait, it would essentially destroy the existing bait market for *F&B* permit holders, currently a viable fishery providing a service to other fisheries. It would also diminish the opportunity that currently exists for those sac roe permit holders who are not interested in fall fishing and rely on roe herring fishing in the spring.

I urge the Board of Fisheries to reject this proposal.

Dan Macdonald
December 19, 2023



Submitted by: Peter Macdonald

Community of Residence: Ancortes

Comment:

Proposal 57

I am opposed to this prosal.

There already exists a limited entry fishery for Food and Bait Herring in Kodiak. At inception of this limited entry fishery the department that only nine permits would be issued based on historical participation and production. I was issued one and still retain it. Even at that small number the department determined that management of the fishery could only work if we formed a combine with only one boat harvesting the quota. This proposal only mentions using herring for canning, pickling, and smoking for this B season. It doesn't mention bait which the majority of herring harvested in the fall is used for. Would sac roe fishers also be allowed to fish herring for bait without having a limited entry permit for food and bait? If so this would be in direct conflict to the existing limited entry fishery.

It should also be noted that the author of this proposal was one of the nine original recipients of a limited entry food and bait permit. He later chose to leave the fishery and SOLD his permit.

Proposal 57: Oppose



Submitted by: Jonathan Madison

Community of Residence: Kenai, Ak

Comment:

Proposal 46: Support...we need to look at this method of legal harvest more in all our sportfish sockeye fisheries....once a legal limit is retained...angler has to stop fishing for the day.

Proposal 49: Do not Support...the Homer Charter Association the proposer of the 49 does not like the restrictions that have been placed on them and are trying to penalize other fisheries.

Proposal 44: Oppose

Proposal 45: Oppose

Proposal 46: Support

Proposal 47: Support

Proposal 48: Support

Proposal 49: Oppose

Proposal 51: Oppose



Submitted by: Riley Malmsten

Community of Residence: Santa Barbara California

Comment:

Dear Board of Fish Members,

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.

Sincerely,

Riley Malmsten

Proposal 62: Support
Proposal 72: Oppose

Proposal 64: Support
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose

Proposal 71: Support



Submitted by: Fisher Mann

Community of Residence: Kodiak

Comment:

To the Chair and members of the State of Alaska Board of Fisheries;

I write in opposition of proposal 73.

1. Due to the mixed stock status of fisheries in the Kodiak Management Area, simply labelling salmon a specific stock in order to keep a management section open is a move from responsible management, and sets a bad precedent.

2. With setnet harvests in decline in the Kodiak management area, adding more fishing time in mixed stock seine harvest is a step in the opposite direction managers should be going. In my opinion, reducing seine fishing opportunity to allow mixed salmon stocks to travel to setnet fishing areas around the Kodiak management area is step number one to restore declining setnet harvest. It is not an allocative issue, 2 separate salmon fisheries exist in the KMA. Setnetters have multiple proposals submitted for this cycle, in my opinion allowing longer setnets without allowing harvestable surplus into setnet areas will result in very little change in the setnet fisheries harvest decline.

3. The Sturgeon river salmon stocks could easily be managed under EO authority to allow for terminal harvests in the event Sturgeon stocks are in great abundance per this proposal 73, however, I have had difficulty locating any management or monitoring of the Sturgeon river salmon stocks in Annual Management Reports and it did not appear on the latest ADFG Escapement memo which was published during the October 2023 work session.

What is the issue you would like the board to address and why? Under the current language in the management plan, the Sturgeon Section of the Westside Management Plan of Kodiak Island is managed in early years on Karluk pink salmon and late run sockeye salmon with no provisions for management of the Sturgeon River which has seen large returns in the past 2 even years. (2020, 2022) The proposed language would allow the Department of Fish and Game to effectively manage the Sturgeon Section for both Karluk and Sturgeon pink salmon so that during years of abundance those stocks can be fully utilized, while at the same time providing protections on even years where one or both stocks could be weak.

PROPOSED BY: Kodiak Seiners Association (HQ-F23-106)

I am opposed to creating a new management plan for this mixed stock seine fishery, by labelling salmon taken in the area as something else, when an EO terminal harvest area could allow for harvest of whatever the proposer claims is there.

Proposal 60: Oppose

Proposal 73: Oppose

Proposal 74: Oppose



PC94

Submitted by: David Martishev

Community of Residence: Homer, ak

Comment:

I oppose proposal 54. Just sad that the big boats want to take away from the little guys. I support proposal 55

Proposal 54: Oppose

Proposal 55: Support



PC95

Submitted by: Joe Martishev

Community of Residence: Homer AK

Comment:

I support proposal 55 and appose proposal 54.

Proposal 54: Oppose Proposal 55: Support



PC96

Submitted by: Mihael Martushev

Community of Residence: Homer, AK

Comment:

No for 54 and yes for 55

Proposal 54: Oppose Proposal 55: Support



PC97

Submitted by: Zenon Martushev

Community of Residence: Homer

Comment:

Future jig fisher. Would like more quota thanks.

Proposal 54: Support Proposal 55: Oppose



PC98

Submitted by: Zenon Martushev

Community of Residence: Homer, alaska

Comment:

Future jij fisher, would like an opportunity to fish longer with out quota being rolled over. Thanks.

Proposal 54: Oppose Proposal 55: Support



PC99

Submitted by: Joe Mauer

Community of Residence: Kodiak, AK

Comment:

I oppose any new king salmon regs for Kodiak area. New regs are not based on science.

Proposal 49: Oppose



PC100

Submitted by: Joseph Timothy Mauer

Community of Residence: Kodiak, AK

Comment:

Proposal 45- Oppose- I believe that bait should be allowed when fishing in Kodiak freshwaters. Harvest of trout species is generally low and salmon are being fished to be retained.

Proposal 46- Support with amendments- I agree that allowing snagged sockeye in freshwater would likely decrease mortality of sockeye salmon, however if it were to be allowed, it should read that "Sockeye salmon may be legally harvested while hooked anywhere in the body in Kodiak Island

freshwaters. Only single hooks may be used for this activity." I also believe there should be some limitation on proxy fishing if it were to be opened to snagging and limits should remain conservative as harvest rates would increase.

Proposal 49- Oppose- I oppose this proposal because the Kodiak fishery is comprised of primarily British Columbia and West coast fish. Taking of these king salmon do not influence the Lower Cook Inlet run. The report "Genetic Stock Composition of the Commercial and

Sport Harvest of Chinook Salmon in Westward Region, 2014–2016" released in December of 2016 by ADFG confirms the initial statement made by myself. I also believe the Homer Charter Association does not have the right to restrict other area's fisheries.

Proposal 51- Support- The number of boat based transporters has exponentially increased in the past 10 years. Many of these commercial transporters place crab pots out for clients using their own sport gear or subsistence gear. Look at any hunting transport website and you will find a photo showing clients around a table of crab or pots full of crab/other shellfish. Per state regulations "An owner, operator, or employee of a lodge,

charter vessel, or other enterprise that furnishes

food, lodging, or sport fishing guide services may

not furnish to a client or guest of that enterprise,

subsistence-, sport-, or personal use-caught shellfish,

unless the shellfish:

1. Has been taken with gear deployed and retrieved by the client or guest;
2. Has been taken with gear that has been marked with the client's or guest's name and address; and
3. Is to be consumed by the client or guest or is consumed in the presence of the client or guest."

I can guarantee that boat operators are not letting clients run hydraulics and throwing pots overboard, nor are they writing the names of each client on the buoys. I feel that this is not well enforced and it really cant be enforced because there are a limited number of troopers that can devote time to this. Additionally, many of the transporters do not return to a home port but rather have clients flown to them. I believe a better solution would be to prohibit commercial transporters from this activity in its entirety.

Proposal 44: Oppose
 Proposal 47: Support
 Proposal 50: Support

Proposal 45: Oppose
 Proposal 48: Support
 Proposal 51: Support

Proposal 46: Support With Amendments
 Proposal 49: Oppose



PC101

Submitted by: Paul McFarland

Community of Residence: Kodiak, AK

Comment:

I'm a lifelong fisherman in Kodiak and grew up seining salmon with my dad. I'm a seine permit holder and aspire to buy my own seine operation in the near future. I have also setnetted in Viekoda Bay, where the seiners had little effect on the fish that came in the middle of the bay before heading to the shoreline and swimming into our net. Half the time, no seiners are even fishing anywhere near there. It seems like the setnetters are just blaming the seiners for their recent lack of success without any good reason. I'm strongly opposed to the proposals that would limit the seine fishery and would be bad for harvest of local stocks. I believe that the Kodiak Seiners Association has the best interest for the town of Kodiak as we need to keep our boats fishing. In particular I am definitely against proposals 62 and 70 which would drastically harm our local fishing fleet. I am also opposed to the Inner Karluk proposal 68 which would destroy our whole red fishery based on arbitrary numbers selected by one member of the public.

Proposal 60: Support

Proposal 62: Oppose

Proposal 68: Oppose

Proposal 70: Oppose