PC1

Submitted by: Greg Acord
Community of Residence: Wasilla

see below

Proposal 205: Support	Proposal 206: Support	Proposal 207: Support	Proposal 208: Support
Proposal 209: Support	Proposal 210: Support	Proposal 211: Oppose	Proposal 212: Support
Proposal 213: Support	Proposal 214: Support	Proposal 215: Oppose	Proposal 216: Support
Proposal 217: Support	Proposal 218: Support	Proposal 221: Support	Proposal 222: Support
Proposal 229: Support	Proposal 230: Support	Proposal 231: Support	Proposal 237: Support
Proposal 238: Support	Proposal 239: Support	Proposal 240: Support	Proposal 241: Support
Proposal 242: Support	Proposal 243: Support	Proposal 244: Support	Proposal 245: Support
Proposal 247: Support	Proposal 248: Support	Proposal 249: Support	

PC2

Submitted by: Dustin Slinker
Alaska Sport Fishing Association

Community of Residence: Anchorage, Alaska

ASA proposal requesting a 3 coho salmon bag limit for 3 Northern Cook Inlet Sport Fishery Locations:

252: Turnagain Arm

243: Knik Arm

221: Susitna River Drainage (primarily Unit 2). With recent downturns in Northern Cook Inlet coho salmon production, and increased commercial harvest percentages of harvestable surplus Northern coho salmon ADF&G may not see enough harvestable surplus coho salmon to return the sport fishery daily bag limit to 3 coho per angler without reductions in commercial coho harvest(s). We don't know about ADF&G positions on these proposals as it is down to the Feb. 8, 2024 public comment deadline, and ADF&G positions on Upper Cook Inlet fishery proposals have not been made public.

Much of the Northern Cook Inlet coho salmon harvest opportunity for sport and other inriver users has gone away, due to expanded commercial harvests. ASA therefore would support regulation reductions in commercial coho harvests within the Northern District as suggested in the following proposals: 212, 214, 213. Commercial regulations need to be less liberal to ensure adequate numbers of coho and other salmon are allowed to migrate inriver to provide a full season of reasonable opportunity as articulated in the Northern District Salmon Management Plan. Commercial regulations should be restrictive enough to provide for reasonable and conservative inriver harvest opportunities throughout the entire season, rather than be anchored to old regulation standards that appear to regularly reduce inriver harvest opportunities. Note: The saltwaters of Northern Cook Inlet are too silty to provide much real harvest opportunity for hook and line sport fisheries -- so adequate salmon must be allowed to migrate inriver to provide harvest opportunities for most Northern Cook Inlet users. The discussion points in these proposals address this issue and provide differing regulatory options for the board to consider.

While proposal 212 would be the most restrictive to the Northern District commercial fishery, it would still provide significant salmon harvest opportunity with a 200 foot gillnet, twice a week, for the approximately 100

commercial permit holders who have registered to fish Northern District waters in recent years. 212 should, also, likely provide much more reasonable salmon harvest opportunities, throughout the entire season, with much less chance of inseason restrictions or closures -- for the many thousands of people living around Northern Cook Inlet who do not own commercial permits. With more salmon allowed to migrate into Northern Cook Inlet streams all users could better share more consistent fisheries, whether ASA's proposals to increase coho salmon bag limits were adopted by the board -- or not.

We support proposal 137, and the concept of one statute mile commercial closed waters around the saltwater terminus areas of the Susitna River and Little Susitna River -- two of the most important rivers providing salmon harvest opportunities for large numbers of both resident and nonresident users in Northern Cook Inlet. If the board were to choose not to adopt proposal 137, then we support Proposal 210 as a means of more reasonably sharing Little Susitna River salmon harvest opportunities amongst the large number of users of this resource.

Although wild king salmon populations in Northern Cook Inlet may take years, or even decades, to recover, we support Proposals 207, 208, and 43 to help facilitate that recovery, and to provide more reasonable sharing of harvestable surplus Northern Cook Inlet king salmon, when and if, that recovery occurs.

Proposal 43: Support	Proposal 137: Support	Proposal 207: Support	Proposal 208: Support
Proposal 210: Support	Proposal 212: Support	Proposal 213: Support	Proposal 214: Support
Proposal 221: Support	Proposal 243: Support	Proposal 252: Support	

ALASKA WILDLIFE ALLIANCE

February 8, 2024

TO: Alaska Board of Fisheries
Upper Cook Inlet Finfish Meeting 2024

RE: Support for Proposal #216, with detailed justification, and an Amended Proposal #217

We appreciate the opportunity to comment on behalf of the Alaska Wildlife Alliance, its members, and supporters, and to provide our support for the following proposals under consideration by the Board of Fisheries during your 2024 meeting of Upper Cook Inlet Finfish. While we explicitly support the two proposals listed below, we only include detailed justification explaining our support for Proposal #216.

- Support proposal #216 as written to reduce the commercial smelt guideline harvest level in Upper Cook from 200 tons to 100 tons (see additional comments below)
- Support proposal #217 to repeal the Cook Inlet Smelt Fishery Management Plan with an amendment to clarify it only applies to the commercial fishery

SUPPORT FOR PROPOSAL 216

Reduce the commercial smelt guideline harvest level in Upper Cook Inlet from 200 tons to 100 tons

The Alaska Wildlife Alliance is a nonprofit organization formed by Alaskans in 1978, to ensure Alaskans will be able to enjoy our wildlife for generations to come. Since our inception, we have been committed to advocating for management practices grounded in science and centered around overall ecosystem health. As such, our comments below supporting proposal #216, which would reduce the commercial guideline harvest level (GHL) back down to 100 tons and still allow existing permit holders an opportunity to fish, focus on the following points:

1. **The eulachon population spawning in the Susitna River has little assessment data, yet the GHL has quadrupled from 50 tons in 1999 to a current arbitrary limit of 200 tons.**
   - *There have only been 3 studies looking at eulachon in the Susitna River in the past 45 years, one of which did not look at abundance, and the most recent two conducted in 2013 and 2016 were not comparable due to different methodologies.*
   - *In the absence of quantitative data on the eulachon population, doubling the GHL to 200 tons in 2017 was arbitrary, and for multiple reasons, it is reasonable to revert back to the prior 100-tons limit.*

2. **Eulachon play a critical ecosystem role in Cook Inlet, especially to endangered Cook Inlet beluga whales, and multiple management plans and agency leaders, as well as the Board of Fisheries in previous years, have emphasized the importance of eulachon to other aspects of the ecosystem.**
   - *Eulachon are an important forage base for many species in both freshwater and marine waters, including endangered Cook Inlet beluga whales.*
   - *100 tons (200,000 pounds) of eulachon is significant to the Cook Inlet beluga whale population, and is equivalent to the amount of fish the entire population consumes in 11-16 days.*
   - *Multiple natural resource management plans and government agency leaders highlight eulachon*

as a critical ecosystem component, and indicate eulachons' importance to Cook Inlet beluga whales.

1. **The eulachon population spawning in the Susitna River has little assessment data, yet the GHL has quadrupled from 50 tons in 1999 to a current arbitrary limit of 200 tons.**

- *There have only been 3 studies looking at eulachon in the Susitna River in the past 45 years, one of which did not look at abundance, and the most recent two conducted in 2013 and 2016 were not comparable due to different methodologies.*

Fisheries management, including in Alaska, has an extensive track record of overharvesting resources that were perceived as so abundant that they could not be overfished. However, many stocks have subsequently collapsed. Climate change has altered previous ecosystem productivity patterns and linkages to amplify these collapses. Eulachon typically live 3-5 years and likely exhibit broad population swings based on spawning conditions, larval rearing conditions, and the marine environment. Eulachon population estimates in nearby waters of Lower Cook Inlet and the Northern Gulf of Alaska have declined dramatically in recent years. But no updated stock abundance estimates are available for Upper Cook Inlet (UCI) eulachon populations.

Despite the relatively long fishery duration, dating back to 1978, there have been only three studies in those 45 years assessing the eulachon population in the Susitna River, where the commercial harvest occurs:

- a 1983-1984 study as part of the Susitna-Watana Hydroelectric Project's dam studies sampled size, sex, and age data and collected CPUE by gillnet to assess run timing, but made no abundance estimates;
- a 2013 Susitna-Watana Hydroelectric Project's dam study used hydroacoustics (sonar) to develop an index of abundance and run timing; and
- a 2016 ADF&G study to estimate spawning abundance.

The 2016 ADF&G study only provided an indirect estimate of eulachon escapement by counting eulachon larvae moving downstream after being spawned and extrapolating from fecundity of adult eulachon migrating upstream[1]. This study was advertised to the Board during the 2017 meeting as being a 3-year study with results available prior to the 2019 smelt fishery season, however, after the Board increased the eulachon commercial GHL to 200 tons in 2017, the subsequent two years of the quantitative assessment of eulachon returning to the Susitna River were cancelled. The 200-ton commercial harvest cap has remained since 2017 without additional assessment of the eulachon population.

Thus, the GHL has quadrupled (50 tons to 200 tons) within a 25-year timespan (see Table 1) with essentially only one population estimate available (since the results from the 2013 and 2016 studies are

[1] Willette, T. M., and R. D. DeCino. 2023. Eulachon spawning biomass in the Susitna River, 2016. Alaska Department of Fish and Game, Fishery Data Series No. 23-16, Anchorage.

not comparable), and with no assessment of changes in the eulachon population over time. Personal use harvests of eulachon from the Susitna River do not appear to be informative for stock assessment, and age, sex, length (ASL) data are only opportunistically collected from the commercial harvest.[2]

- *In the absence of quantitative data on the eulachon population, doubling the GHL to 200 tons in 2017 was arbitrary, and for multiple reasons, it is reasonable to revert back to the prior 100-tons limit.*

Eulachon are an anadromous species, that spend most of their short lives in the marine environment, before returning to rivers in the spring to spawn and die. In UCI, commercial harvest of eulachon during the spring migration occurs in the vicinity of the Susitna River.

- Records of commercial harvests date back to 1978, with no harvest limit set until 1998, when ADF&G arbitrarily chose 50-tons as the GHL, despite the greatest harvest annually to that point being 9.3 tons (see Table 1). That year, the commercial harvest of eulachon drastically increased and met that 50-ton limit.
- The commercial fishery was closed by the Board in 2000 and stayed closed through 2004.
- In 2005, the commercial fishery reopened with a doubling of the prior GHL to an arbitrary 100-ton harvest limit. The intent at that time was that the harvest limit stay at 100 tons until an assessment of stock strength could be made.
- Based on the 2016 ADF&G study, for which the two follow-up years of study were cancelled, and a 2016 proposal, the Board increased the GHL to 200 tons (400,000 pounds) in 2017.
- **The GHL has quadrupled from 50 tons to 200 tons over the past 25 years with essentially one assessment of the population abundance and no assessments of how the population is changing over time, making the current 200-tons GHL arbitrary.**

In ADF&G's official comments to the 2016 proposal #143 to double the GHL from 100 tons to 200 tons, they made it clear that they provided their neutral recommendation based on qualitative, subjective, anecdotal reports in addition to self reports: "The department considers the current cap of 100 tons to be sustainable based on performance of the fishery and reports of large numbers of smelt migrating up the Susitna River."[3] They used the same justification of using subjective data in their comments to the 2023 proposal #216, but also explicitly stated "The department does not quantitatively assess smelt returning to UCI."[4] During recent Advisory Committee meetings, it was made clear ADF&G has no plans to conduct any UCI eulachon studies any time in the near future. They further stated in their current comments that there are no biological concerns, however, they have no scientific data to support that statement because they did not conduct the second or third year of the 3-year abundance study. Given documented declines in LCI and Gulf of Alaska eulachon in recent years, coupled with known environmental changes since 2016 and the short lifespan of eulachon, a

[2] B. Bechtol, retired ADF&G Commercial Fishery Biologist, pers. comm., February 2024.
[3] ADF&G's 2017 comments on proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf
[4] ADF&G's comments on Upper Cook Inlet Finfish proposals considered in 2024 are available under the "Department Comments" section at https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=02-23-2024&meeting=anchorage

precautionary approach to managing this fishery for the long-term is to return the GHL to the prior 100-tons limit until rigorous studies can be conducted to provide reliable data upon which to know if the current population can sustainably support a 200-ton commercial harvest limit. Management decisions should not be based on a single year's study which was only able to *indirectly* estimate eulachon abundance.

When examining the commercial eulachon harvest data (see Table 1), there are several things of note which suggest the reasonableness of a 100-ton harvest limit:

- the average harvest of all years with a harvest since 1978 was only 100.8 tons;
- there is a long-term history of the limit being 100 tons (2005-2016) with that limit only being slightly exceeded in two of those years, even with up to 11 permit holders; and
- the current harvest limit, which was arbitrarily doubled in 2017, has been exceeded twice (in 2020 and 2021), after which the harvests notably decreased in subsequent years (2022 harvest decreased by almost 55 tons and the 2023 harvest decreased further by almost 79 tons).

Given the documented declines of eulachon in Lower Cook Inlet and the Gulf of Alaksa, as well as concurrent declines of other fish species, it is reasonable to conclude Upper Cook Inlet eulachon have also declined. One possible conclusion is that the recent decline in harvest of eulachon in the Susitna River the past two years is a result of both the overall eulachon population declining, coupled with the highest levels of commercial harvest ever recorded occurring in 2018-2021, suggesting the 200-ton harvest limit is unsustainable. Since eulachon only live 3-5 years, it makes sense that there was insufficient escapement in the four consecutive years the harvest was close to, or exceeded, 200 tons.

The 2016 proposal asking for the doubling of the harvest limit from 100 tons to 200 tons argued an increase was needed in part because "Having such a low quota causes an unnecessary race for fish by the participants in this fishery, and causes managers to have to be unduly burdened with very close monitoring of the catch which can exceed the quota in just a few short days."[5] Ironically, that same argument still applies despite the limit being increased to 200 tons, as evidenced by the elevated harvest limit being exceeded in both 2020 (211.8 tons) and 2021 (222.4 tons).

2. Eulachon play a critical ecosystem role in Cook Inlet, especially to endangered Cook Inlet beluga whales, and multiple management plans and agency leaders, as well as the Board of Fisheries in previous years, have emphasized the importance of eulachon to other aspects of the ecosystem.

➢ *Eulachon are an important forage base for many species in both freshwater and marine waters, including endangered Cook Inlet beluga whales.*

Eulachon primarily feed on plankton, euphausiids, mysids, and amphipods. Serving as an oil-rich prey item (15-20% oil content), eulachon are consumed by a broad range of marine mammals, birds, and

[5] The text of proposal 143 considered in the 2017 BOF meeting can be found at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/proposals/143.pdf

fish.[6] In Cook Inlet, these predators primarily include:

- marine mammals such as endangered Cook Inlet beluga whales, harbor seals, harbor porpoise, and to a lesser degree humpback whales, killer whales, and Steller sea lions;
- terrestrial mammals including river otters and bears;
- birds preying on live and dead eulachon include gulls, terns, ducks, bald eagles, shorebirds, corvids, and other birds; and
- a wide variety of fish which prey on different eulachon life stages in both fresh and salt water, such as all five Pacific salmon species, Dolly Varden, spiny dogfish, walleye pollock, Pacific cod, Pacific herring, Pacific halibut, sablefish, rockfish, Pacific sand lance, three-spine stickleback, steelhead, and many others.

The Cook Inlet beluga whale population, which resides in Cook Inlet year-round, has experienced a significant decline over the same period as eulachon have been commercially harvested in the Susitna River region (see Figure 1). In 1979, there were approximately 1,300 beluga whales, but the population has crashed significantly and has been hovering at around 300 whales for the past several years; that's a loss of around 1,000 individuals in under four decades. Because of this decline, and the lack of recovery of this whale population, they were listed as an "endangered species" in 2008[7], and critical habitat, which includes but is not limited to all of UCI north of the forelands, was designated in 2011[8]. NOAA Fisheries has explicitly identified eulachon as a critical prey species for the endangered Cook Inlet beluga whales, particularly in late spring/early summer when the whales have lost substantial weight after surviving a winter with little food[9]. Cook Inlet beluga whales start to rebuild their energy reserves by spring feeding on eulachon, followed by king and coho salmon during the summer. But declines in king and coho salmon populations make spring eulachon even more important, particularly for pregnant and lactating females who may not have sufficient energy reserves to wait until the salmon run. NOAA Fisheries has identified several threats to these whales, including a "reduction in prey"[10]. Along with the Cook Inlet beluga population's declining numbers, recent research has documented these belugas are reproducing slower than their counterparts in other areas, and that if sufficient food was available, they would be able to better withstand the other threats they face and potentially increase their reproductive rates to those displayed by other beluga whale populations.[11,12]

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[6] Gustafson, R.G., M.J. Ford, D. Teel, and J.S. Drake. 2010. Status review of eulachon (*Thaleichthys pacificus*) in Washington, Oregon, and California. U.S. Dept. Commer., NOAA Tech. Memo. NMFS-NWFSC-105, 360 p.

[7] 73 FR 62919

[8] 76 FR 20180

[9] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.

[10] Id.

[11] McHuron, E.A., M. Castellote, G.K. Himes Boor, K.E.W. Shelden, A.J. Warlick, T.L. McGuire, P.R. Wade, K.T. Goetz. 2023. Modeling the impacts of a changing and disturbed environment on an endangered beluga whale population, *Ecological Modelling*, 483: 110417.

[12] Norman, S.A., R.C. Hobbs, L.A. Beckett, S.J. Trumble, and W.A. Smith. 2020. Relationship between per capita births of Cook Inlet belugas and summer salmon runs: age-structured population modeling. *Ecosphere* 11(1): e02955.

- *100 tons (200,000 pounds) of eulachon is significant to the Cook Inlet beluga whale population, and is equivalent to the amount of fish the entire population consumes in 11-16 days.*

In their comments to the 2016 proposal #143, ADF&G stated "the amount of smelt needed by beluga whales is unknown."[13] However, studies on belugas in captivity, for whom smelt are a primary food source, suggest belugas need to consume 2.5-3% of their body weight each day; that's roughly between 40-60 pounds a day of fish per whale[14]. Noting that the entire Cook Inlet beluga whale population can be found in the vicinity of the Susitna River in late spring/summer[15], a very simple calculation can provide some guidance on the issue ADF&G claimed is unknown. Assuming approximately 300 beluga whales remain in Cook Inlet, that would equate to this population needing between 12,000 and 18,000 pounds of fish a day. When the eulachon are running, they are the primary food source for belugas, thus it is reasonable to conclude that all 12,000-18,000 pounds consumed a day are eulachon. Studies on other toothed whales indicate that females who are nursing young calves have to increase their daily consumption between 32-63% to offset milk production[16], so 12,000-18,000 pounds a day of fish may be an underestimate for wild Cook Inlet beluga whales when factoring in nursing females and the extra energy wild animals expend over their counterparts in captivity. In their prior comments, ADF&G also stated they had no information about "how a removal of an additional 100 tons of smelt annually would affect populations of smelt predators in UCI."[17] However, continuing the simple calculation demonstrates that removing an additional 100 tons (200,000 pounds) of eulachon from the Susitna River region is equivalent to removing food from the entire beluga population for 11-16 days. Furthermore, the 2016 proposal #143 requesting to double the GHL stated "We have shown that a single person may catch 35,000 fish (5,000 lbs) per hour with a very small (22 inch) hand held dipnet."[18] This means that **in only 3 hours, a single person can remove enough eulachon from the Susitna River to feed the entire Cook Inlet beluga whale population for one day.**

- *Multiple natural resource management plans and government agency leaders highlight eulachon as a critical ecosystem component, and indicate eulachons' importance to Cook Inlet beluga whales.*

The *Forage Fish Management Plan* (5 AAC 39.212) recognizes the importance of forage fish, including eulachon, as an ecosystem component critical to higher trophic level species. The Board of Fisheries established a Forage Fish policy intended to consider the ecosystem role played by forage species such as eulachon**.** Previous Board of Fisheries discussions raised concerns about how eulachon harvests may impact survival and rebuilding of endangered Cook Inlet beluga whales. But with a Board focus on

[13] ADF&G's 2017 comments on proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf
[14] Values obtained from https://seaworld.org/animals/all-about/beluga-whales/diet/#, which is the only aquarium who has a Cook Inlet beluga whale in captivity.
[15] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.
[16] Lockyer C. 1981. Estimates of growth and energy budget for the sperm whales, *Physeter catodon* . FAO Fishery Service 5:489–504.
[17] ADF&G's 2017 comments on proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf
[18] The text of proposal 143 considered in the 2017 BOF meeting can be found at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/proposals/143.pdf

salmon returns, there has been little attention, or recognition, of ecosystem components such as eulachon.

NOAA Fisheries' 2016 *Recovery Plan for the Cook Inlet Beluga Whale*[19] calls out eulachon as a key prey item and identified "reduction in prey" as a known threat to the belugas' survival. Furthermore, the Recovery Plan specifically includes an action item indicating ADF&G should "Ensure fisheries management (e.g., escapement goals for CI beluga prey species) adequately accommodates CI beluga prey requirements, and if necessary, expand the number of species with escapement goals."

On February 2, 2024, at a public meeting of the Cook Inlet Beluga Whale Recovery Implementation Taskforce, ADF&G's Commissioner Doug Vincent-Lang and Marine Mammal Program Coordinator Dr. Lori Polasek, both highlighted that ADF&G is committed to taking actions to ensure Cook Inlet beluga whales have enough food. Commissioner Vincent-Lang commented that the State is restricting dip net and drift net fishing, and Dr. Polasek indicated she had just learned about proposal #216 days prior and would be sending comments to the fishery biologist emphasizing the importance of eulachon to Cook Inlet beluga whales, especially in the Susitna River region. However, given the extensive review and approval process ADF&G's formal comments must go through prior to submission to the Board, it is unlikely Dr. Polasek's comments were received in time to be incorporated into ADF&G's formally submitted comments to the Board.

In summary, **we urge you to pass Proposal #216 because it follows the precautionary principle to ensure the fishery's long-term sustainability while also promoting overall ecosystem health.** We support changing the GHL back to the 100 tons level until there are rigorous scientific data supporting that an increase is sustainable for both the fishery and ecosystem because:

- 100 tons maintains an opportunity for a commercial fishery of eulachon in Upper Cook Inlet;
- 100 tons was sustainable as it was the harvest limit from 2006 through 2016, and rarely exceeded, even with up to 11 permit holders;
- 100 tons is the average harvest amount taken via the commercial fishery for all years with a harvest between 1978 and 2023;
- 100 tons was the amount which ADF&G stated in their comments on the 2016 proposal #143[20] was sustainable;
- 100 tons is aligned with an ecosystem-level management strategy, as directed by various management plans; and
- adding back 100 tons of eulachon to the UCI ecosystem is the equivalent of adding back in enough food to feed the entire endangered Cook Inlet beluga whale population for 11-16 days, at a time when they are desperately in need of this early season, oil-rich prey after losing significant weight overwinter, especially for females nursing calves.

[19] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.

[20] ADF&G's comments on 2016 proposal 143 to increase the GHL from 100 tons to 200 tons are available on page 243 at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2016-2017/uci/rc2.pdf

We appreciate the opportunity to share our comments, and your time reading and considering our input. We encourage you to reach out to us directly in advance of the Board of Fisheries meeting should you have any questions regarding our comment.

Thank you,

Mandy Migura
Deputy Director and Marine Program Coordinator
[redacted]

See below for Table 1 and Figure 1

ALASKA WILDLIFE ALLIANCE

Table 1: Commercial Eulachon Harvest and Effort in Upper Cook Inlet, 1978–2023.

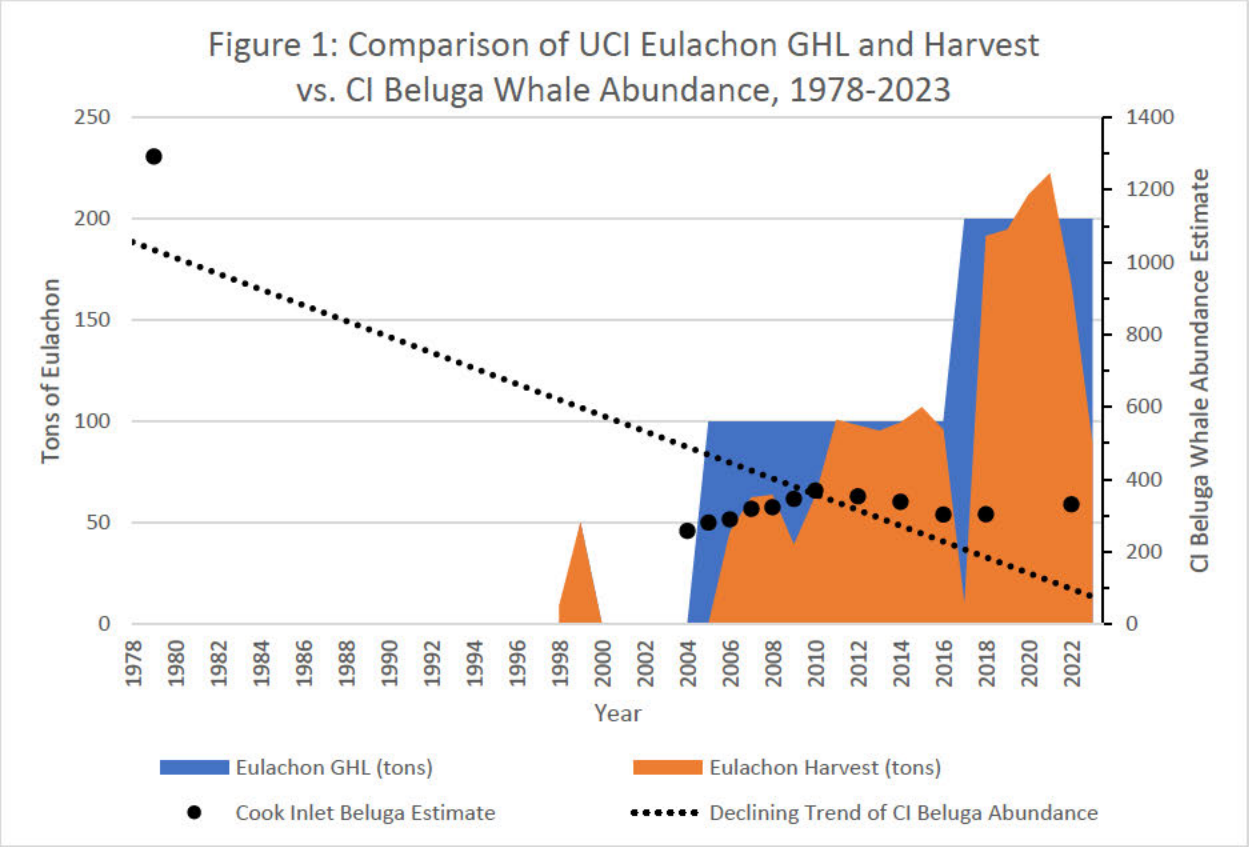
Year	GHL (tons)	Harvest		Permits
		Pounds	Tons	
1978	NA	300	0.2	NA
1980	NA	4,000	2.0	NA
1998	NA	18,610	9.3	2
1999	50	100,000	50.0	NA
2000	FISHERY CLOSED			
2001	FISHERY CLOSED			
2002	FISHERY CLOSED			
2003	FISHERY CLOSED			
2004	FISHERY CLOSED			
2005	100	0	0	8
2006	100	90,783	45.4	8
2007	100	125,044	62.5	11
2008	100	127,365	63.7	6
2009	100	78,258	39.1	6
2010	100	126,135	63.1	3
2011	100	201,570	100.8	5
2012	100	195,910	98.0	4
2013	100	190,830	95.4	4
2014	100	198,814	99.4	4
2015	100	213,934	107.0	4
2016	100	191,536	95.8	4
2017	200	18,685	9.3	< 3
2018	200	382,967	191.5	4
2019	200	389,473	194.6	6
2020	200	423,613	211.8	7
2021	200	444,838	222.4	7
2022	200	335,494	167.7	7
2023	200	177,588	88.8	5
Average		**201,572**	**100.8**	**5.2**
St.Dev.		129,246	64.6	2.3

NA is not available. The dashed line delineates the sporadic reports pre-1998; after the line data are presented annually. The boxes indicate years eulachon abundance studies in the Susitna River were conducted, noting methodologies differed. Sources: Shields 2005[21], 2006[22]; Lipka and Stumpf 2024[23]; B. Bechtol, retired ADF&G Commercial Fisheries/Bechtol Research, pers. comm.

[21] Shields, P. 2005. Upper Cook Inlet commercial herring and smelt fisheries through 2004. Alaska Department of Fish and Game, Special Publication No. 05-14, Anchorage.

[22] Shields, P. 2006. Upper Cook Inlet commercial fisheries annual management report, 2005. Alaska Department of Fish and Game, Fish28888ery Management Report No. 06-42, Anchorage.

[23] Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.



Source data: Eulachon GHL and Harvest pulled from Table 1 (Shields 2005[24], 2006[25]; Lipka and Stumpf 2024[26]; B. Bechtol, retired ADF&G Commercial Fisheries/Bechtol Research, pers. comm.; Cook Inlet beluga whale abundance data obtained from NMFS 2016[27] and Goetz et al. 2023.[28]

[24] Shields, P. 2005. Upper Cook Inlet commercial herring and smelt fisheries through 2004. Alaska Department of Fish and Game, Special Publication No. 05-14, Anchorage.
[25] Shields, P. 2006. Upper Cook Inlet commercial fisheries annual management report, 2005. Alaska Department of Fish and Game, Fish28888ery Management Report No. 06-42, Anchorage.
[26] Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.
[27] National Marine Fisheries Service. 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.
[28] Goetz, K. T., Shelden, K. E. W., Sims, C. L., Waite, J. M., and Wade, P. R. 2023. Abundance of belugas (*Delphinapterus leucas*) in Cook Inlet, Alaska, June 2021 and June 2022. AFSC Processed Rep. 2023-03, 47 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

To: Alaska Board of Fisheries January 25, 2024
UCI Meeting February 23 – March 6, 2024

From: Alaska's PNP Salmon Hatchery Operators

Re: Proposal 43 5 AAC 40.820 Basic Management Plans & Response to Synthesis Research

Dear Chair Wood and Board Members:

At the Alaska Hatchery committee meeting October 14, 2023, RC 002 and RC 003 Ruggerone and McMillan synthesis papers were submitted to the Board, but there was little chance for discussion and context. We appreciate the opportunity to comment here. These are lengthy synthesis papers and therefore they deserve a proper substantive response. Nonetheless, we intend to maintain concision and clarity. In this paper we will present informative studies/research on the topics of pink salmon abundance, salmon enhancement, and mechanisms for salmon declines regionally while recognizing there are also significant increases in salmon productivity in other regions of the North Pacific Ocean.

I. Introduction

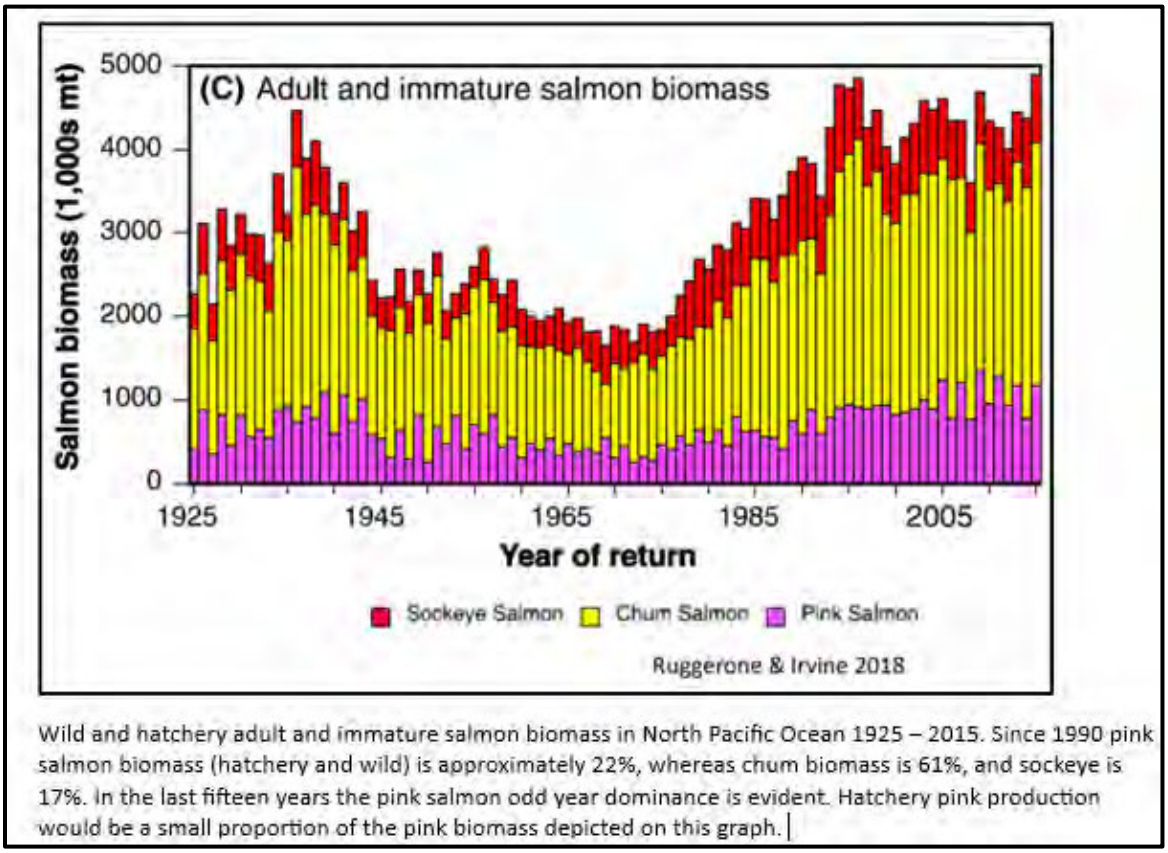
The two research papers for consideration are *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems*, Ruggerone et.al., and *Global Synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*, McMillan et.al. These papers are dense with historical data and hypothesize negative correlations that suggest pink salmon impacts on other species, and specifically hatchery produced salmon impacts on wild salmonids, mammals, avians, and other life forms. However, they do not demonstrate a mechanistic linkage. We will show contrary research that reveals mechanistic linkages for increases in Alaska salmon productivity (both wild and enhanced) ushered in by the post 1977 regime shift (Pacific Decadal Oscillation or PDO), as well as other research that demonstrates small effects of ocean rearing juvenile salmon to regional zooplankton densities.

The debate about ocean carrying capacity has been ongoing in Alaska since the inception of the Ocean Ranching program in the mid-1970s. We do not contend that hatcheries have no effects. There are potentially negative ones, relative reproductive success (RRS) for example. However, there are benefits such as Pacific Salmon Treaty offsets and more king salmon for sport fisheries as well as reducing harvest impacts on natural stocks by all user groups. The best counterargument to the Ruggerone and McMillan papers is the Wertheimer et.al. document presented to the board of fisheries in 2018.[1] We will separately resubmit and update: *High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate* with an on-time public comment. However, the most salient points that challenge the Ruggerone and McMillan papers will be presented in this document, including pertinent references to the Wertheimer et.al. paper. Prior to discussing research, we feel it is critical to establish baseline information and nomenclature to lend context to the discussion of Alaska hatchery production of pink and chum salmon which is often missing in scientific journals and opinion pieces.

Abundance vs Biomass

Definitions are necessary, to sort out the "apples versus the oranges" so we can keep the differences straight. There is understandable confusion with the terms abundance or numbers of salmon in the ocean versus biomass of salmon in the ocean (see graph below & graph page 3). This is particularly true when ascertaining which is the dominant driver or drivers of top-down effects. Pink salmon represent the greatest number or abundance of salmonids in the ocean in any given year, but not in biomass. Pink salmon have the smallest body size (two to four pounds) and migrate to the ocean in one year and return to their natal stream the following year, whereas chum (five to fourteen pounds) and sockeye (four to eight pounds) are far larger and spend two to four years in the ocean prior to returning to their natal stream.

[1] Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate.



Wild and hatchery adult and immature salmon biomass in North Pacific Ocean 1925 – 2015. Since 1990 pink salmon biomass (hatchery and wild) is approximately 22%, whereas chum biomass is 61%, and sockeye is 17%. In the last fifteen years the pink salmon odd year dominance is evident. Hatchery pink production would be a small proportion of the pink biomass depicted on this graph.

Therefore, pink salmon peak in abundance in the spring as fry. However, as biomass chum and sockeye salmon surpass pink biomass in any single year. Mortality is a significant factor in the first thirty to forty-five days of ocean life for pink and chum when mortality on average is between 50% to 90%.[2]

Wild Pink vs Hatchery Pinks

The vast majority of pink salmon in the North Pacific and Bering Sea are from wild populations, estimated at approximately 25 billion fry annually throughout the Pacific Rim for all salmonids. An additional 5 billion fry are hatchery pink and chum fry from Russia, Japan, and Alaska. The hatchery proportion in terms of abundance of **all pinks is about 15%**.[3] **The biomass of hatchery pinks** is an even smaller proportion, perhaps **less than 5%** (refer to the biomass graph above). These hatchery proportions, whether in abundance or biomass, significantly differ from

[2] Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia.

[3] Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate.

depictions elsewhere. Aggregate samples for abundance of juvenile pinks from the 2022 International Year of the Salmon research vessels align with the proportions above, 8.2% for Alaska hatchery pink salmon (although data is hampered by small sample size N=58). Chum salmon sample size was more robust (N=536), showing a hatchery portion of 15.3% for Pacific Rim countries while Alaska hatchery percentage is 5.4%, Japan 4.7%, Canada 0.6% and Russia 0.6%.[4]

Based on data from the Ruggerone paper here is the actual data that gets misquoted which we delineated in the High Ocean Biomass paper:

> Approximately 39% of all North Pacific pink salmon, 22% of chum salmon, and 69% of sockeye salmon are produced in Alaska (combining wild and hatchery) production while most of the remaining quantities are produced by Japan and Russia. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye salmon during 1990–2015 were of hatchery origin (all countries). In particular, Alaska generated 68% and 95% of hatchery pink salmon and sockeye salmon, respectively, while Japan produced 75% of hatchery chum salmon. Large areas of Alaska (PWS and Southeast Alaska), Russia (Sakhalin and Kuril islands), Japan, and South Korea possess salmon abundance that is predominantly from hatchery production. During 1990–2015, hatchery salmon (Japan, Korea, Russia, and Alaska) constituted approximately 40% of the total biomass of adult and immature salmon in the ocean.

The misquote arises from the 40% value. It is correct to say that “of the total wild and hatchery adult and immature salmon biomass in the North Pacific, 40% is hatchery origin”. However, it is **incorrect** to state that 40% of pink, or pink and chum **are Alaska's hatchery-originated** salmon. Alaska’s hatchery component of that 40% is closer to 20%, with Japan and Russia contributing the remainder. Specifically, Japan produces 70% of the hatchery chum, while Alaska almost equals it with pink salmon hatchery production at 68% of North Pacific pink releases. These proportions seem large but to reiterate they are percentages of just the hatchery component which is about 15% of the total abundance of wild and hatchery salmonids.

[4] Unpublished data from IYS. Source NOAA fisheries and ADF&G 2024.

Hatchery Production by Country of Origin

Of the five billion hatchery salmon released into the Pacific each year, Russia (pink & chum) and Japan (chum) release about three billion salmon fry while Alaska releases approximately two billion fry (pink & chum). The annual assessment by the North Pacific Anadromous Fish Commission (NPAFC) shows that production has been nearly constant since 1990.

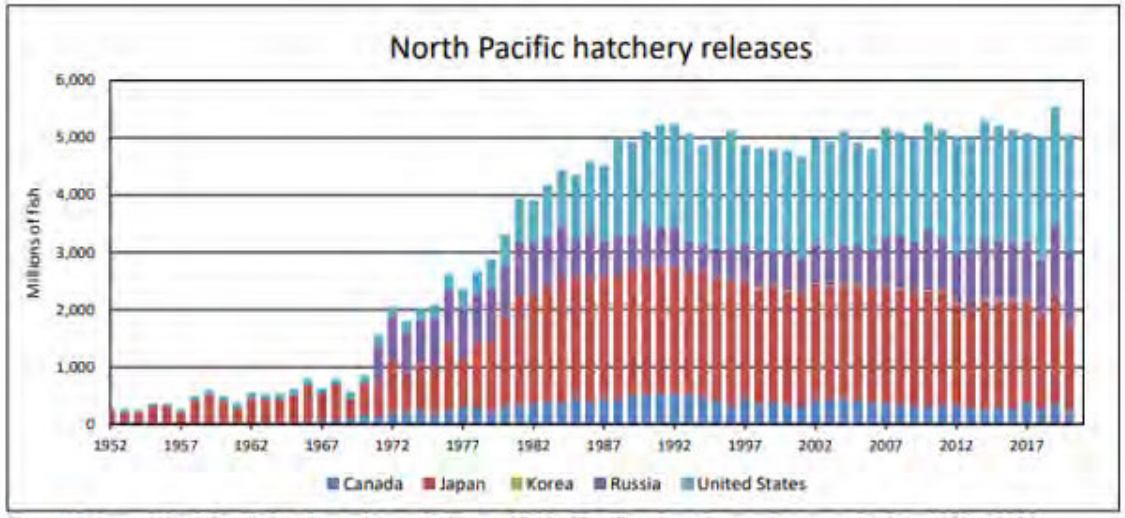


Figure 10. Annual North Pacific hatchery releases (millions of fish) of Pacific salmon by member countries from 1952 to 2020.
* Canadian estimates include both hatchery releases and spawning channel production.

Hatchery production of Pacific nations Canada, Japan, Korea, Russia, and U.S. (primarily Alaska) has been stable since about 1990. Japanese production of chum went up in 2019 but was back down in 2020. Five billion, hatchery pink and chum fry, are released annually. An estimated 25 billion wild fry are produced from Pacific Rim wild systems, or approximately 83% of total salmonid abundance. Graph from North Pacific Anadromous Fish Commission annual report 2021

According to the North Pacific Anadromous Fish Commission, hatchery production varies by species, as illustrated in the figure below. Sockeye hatchery production is primarily concentrated in PWS and Canada, while the greatest production of chum salmon is in Japan (two billion) and Southeast Alaska. The highest level of pink salmon production is found in PWS and Russia.[5]

[5] https://www.npafc.org/

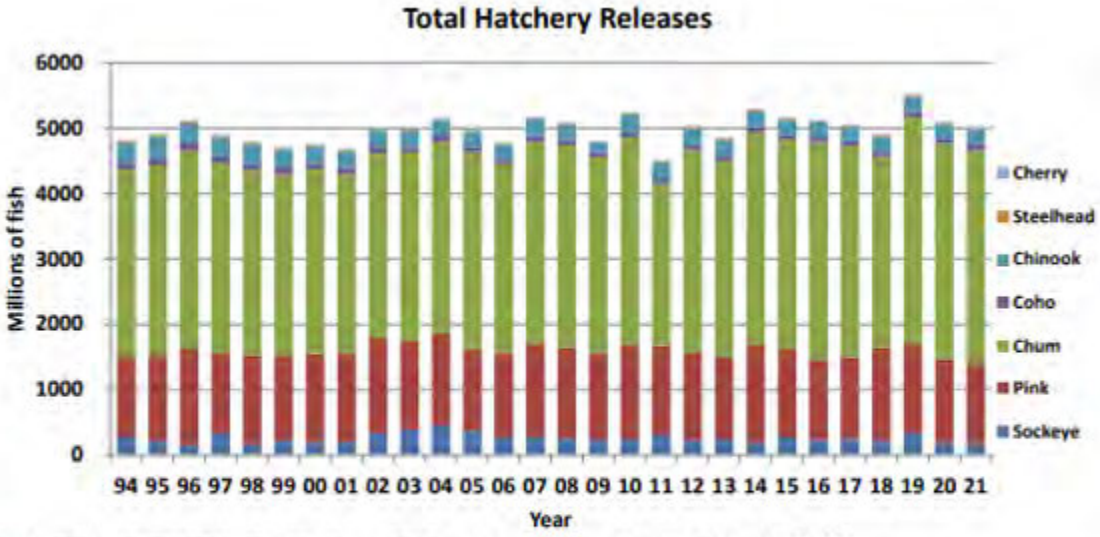


Figure 6. Annual hatchery releases of salmon and steelhead by species in millions of fish, 1993–2021.

Hatchery releases by species aggregated all-country totals show steady fry release numbers since the early 1990s. U.S. releases are mostly Alaska, although chinook and coho programs in the Pacific Northwest are significant. Graphs from NPAFC 2022.

II.Review/Discussion

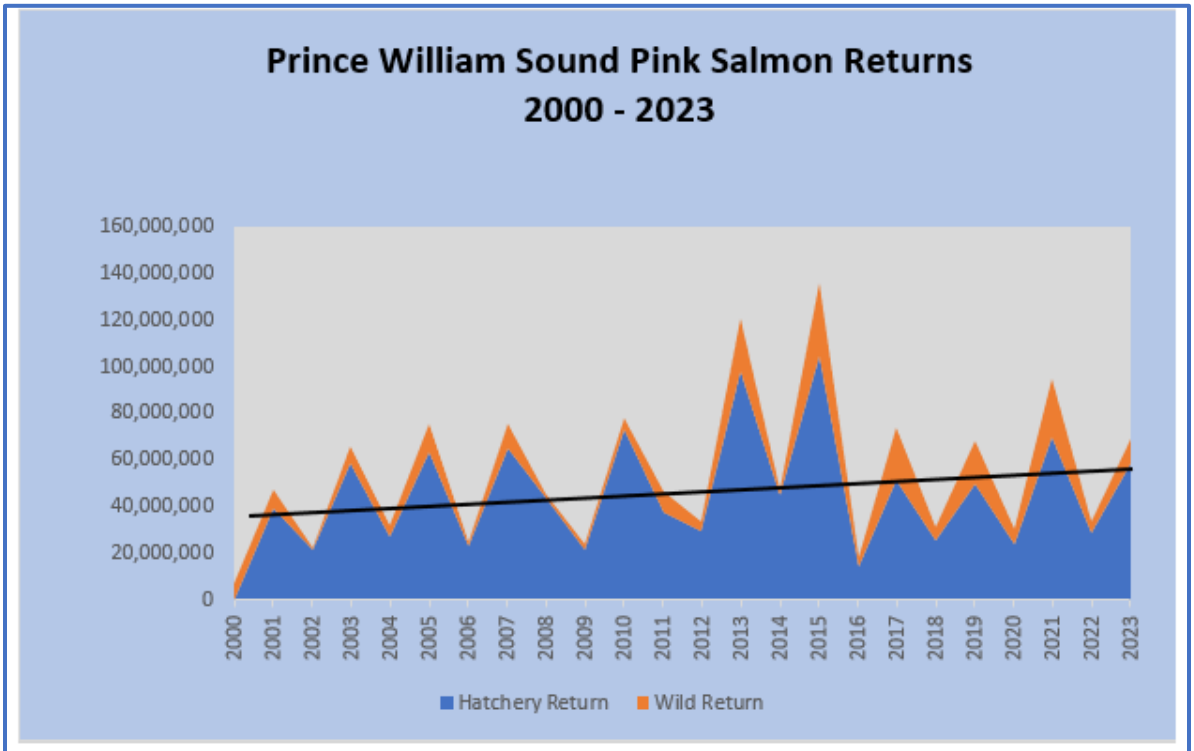
Ruggerone et.al. *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems, Ruggerone et.al.*[6]

The scientific method relies on systematic, testable, repeatable methodology, and common data sets, especially when referring to historical data, for two reasons.[7] First, the data set can be tested and repeated as in the original research. Second, the data set can be added to, replacing forecasted data (e.g., 2018 to 2023) with actual measured values. At the time of this writing, we were unable to obtain the data set Ruggerone cited to repeat the analysis -- a fundamental aspect of the scientific method. Furthermore, the biomass of immature and adult salmon cited in the abstract and picked up by casual observers "…hatchery production (~40% of the total adult and immature salmon biomass)" does not align with NPAFC data used in the paper cited previously. From 1990 to 2015, pink salmon's immature and mature biomass (hatchery and wild) was around 800,000 metric tons, or 22% of total biomass. The total abundance of wild

[6] Ruggerone et.al. 2023. From diatoms to killer whales: impacts of pink salmon on North Pacific ecosystems
[7] Lackey R., 2020. Darwin Was Right: A Scientist Needs a Heart of Stone

pink salmon fry in the North Pacific is proportionally 85%, with hatchery pink salmon making up the remaining 15%.[8] Therefore the biomass of hatchery pinks is some fraction of the 22% pink salmon immature and mature biomass, certainly not 40%. Unfortunately, this fact seems to be misrepresented, or ignored when the original study is discussed in the press and public forums.

Regardless, major data sets, such as the one presented by Ruggerone, provide valuable insights. The paper does not argue a negative causal relationship between hatchery salmonids and wild salmonids, but rather synthesizes existing data sets to identify patterns and processes that may reveal how hatchery salmonids can potentially affect wild salmonids. To counter this notion, let's consider the actual data for Prince William Sound pink salmon. If we add Ruggerone's study to the five intervening years, wild pink salmon show an increasing productivity trend.



Prince William Sound wild and hatchery pink salmon returns 2000 – 2023. The Ruggerone paper does not include years 2016 – 2023 shown here. Note the wild stocks in orange showing increasing productivity in both odd and even years from 2017 – 2023 compared to year's 2000 - 2016. Data from ADF&G and PWSAC.

The authors acknowledge that the studies included in their synthesis did not necessarily imply causation, and therefore their work is speculative, as is true of similar past papers. Events may

[8] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

occur in tandem, but it does not necessarily mean that one directly causes the other. In scientific studies or data analysis, it is vital to differentiate between correlation (events happening together) and causation (one event directly influencing the other). Correlation may hint at a relationship between two things, but correlations can be misleading. In contrast, cause and effect is more akin to a sturdy bridge, supported by solid pillars of evidence and logical connections. This metaphorical bridge guides us with confidence from one understanding to another, unveiling the true nature of the world. Science, not advocacy, should be our guiding principle.

To explore an example from the Ruggerone paper, let's examine the predicted negative effects on herring stocks, where they specifically mention Sitka Sound herring. Contrary to their prediction, in the past five years, the large herring stocks in most of Alaska – Togiak, Kodiak, PWS, Craig, and Sitka Sound have increased significantly. For 2024, the Sitka Sound herring stock biomass is estimated by the ADF&G to be 406,228 tons of mature biomass, eclipsing any former biomass in Sitka Sound and exceeding that of Togiak. In 2023, the biomass in Sitka Sound was 292,669, a record until the 2024 estimate.[9] The PWS herring, decimated by the 1989 oil spill, has been down for two decades but is now forecasted to have a harvestable surplus in 2024. Kodiak experienced the largest herring harvest of the past two decades in 2023.

The ocean is complex, and the forecasting model presented by Ruggerone, et.al. misses the mark. Similarly, killer whales and humpback whales have increased by multiples of two to three times in the past three decades.[10] The model data may have been tailored for a particular outcome or simply overlooked the Alaskan killer whale population, rather they focused on Southern Resident killer whales, to suggest that pink salmon are the driver of their downfall. Yet, pink salmon production in the Salish Sea is minimal when compared to wild and hatchery pinks in Alaska where Killer Whales are thriving. There is a bit of anti-commercial fishing bias going on here. As an example, sport fishing groups – which funded some of the McMillan paper

[9] https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1552946314.pdf
[10] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

- signed on to the Wild Fish Conservancy's lawsuit[11] against the State of Alaska aimed at halting commercial trolling, but not sport fishing on the very same Pacific Northwest king salmon stocks.

Contrary to large data set modelling, comprehensive research has been conducted in the Bering Sea and North Pacific Ocean by fishery science teams from the United States, Russia, Korea, Japan. This includes International Year of the Salmon (IYS) ocean studies spanning 2018-2022, that aimed to fill significant information gaps in our understanding of salmon migration, productivity, and the effects of marine heat waves. The NPAFC, an international body that compiles and reports on salmon status and research over the past 30 years, is another organization intimately engaged in this research. The latest IYS report for 2023 is currently in press but reports from 2022 and earlier are available. We will delve into a selection of these studies and others, presenting a more mechanistic perspective on 'From Diatoms to Killer Whales.[12,13] ADF&G scientists have played a crucial role in these endeavors, including the recently formed Salmon Ocean Ecology Program. [14]

Without a doubt, pink salmon are the most prolific salmon species, possessing remarkable reproductive abilities and extensive range capabilities in the Northern Hemisphere. Wild pink salmon have extended their range into the Arctic and around to Scotland and Sweden. Evolutionarily, pink salmon are the most successful salmon species yet the least intra-genetically distinct, defined by their short residence in freshwater (where prey are more limited) and their ability to spawn in a trickle of water to large rivers, or intertidal estuaries. Reports suggest their genetic plasticity benefits them in a warming ocean, with the odd-year component faring better than the even-year brood line. One might argue that pink salmon are the most resilient of the salmonids.

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[11] https://www.fisheries.noaa.gov/agency-statement/noaa-fisheries-recent-actions-wild-fish-conservancy-v-quan
[12] https://www.npafc.org/
[13] Technical Report 22 Report of the Final Workshop (November 1–2, 2023) Describing Observations Made During Winter Surveys of the International Year of the Salmon Expeditions to the Gulf of Alaska. https://www.npafc.org/technical-report/
[14] https://www.adfg.alaska.gov/index.cfm?adfg=salmonoceanecology.main

The Ruggerone paper sets out their basis for production and biomass, which is summarized in Wertheimer as follows: During 1990–2015, pink salmon dominated adult abundance (67% of total) and biomass (48%), followed by chum salmon (20% abundance, 35% biomass) and sockeye salmon (13% abundance, 17% biomass).[15] Together the biomass of chum and sockeye salmon amounts to 52%. The total pink salmon biomass is 48%, of which approximately 85% of the 48% would be wild pink biomass. This equates to 41% wild pink biomass, **7% hatchery pink biomass** (all Pacific Rim countries), 35% chum biomass, and 17% sockeye biomass. The remainder of 4% biomass is coho and Chinook.

For additional context of salmonid biomass within total North Pacific nektonic biomass Shuntov et.al.[16] and Wertheimer provide the following insights:

> In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Since then, biomass of salmon has increased current levels of 4-5 million tons, representing 4-8% of total nektonic biomass during period of high abundance.

In terms of total ocean nektonic biomass, salmon represents a small proportion. Prince William Sound hatcheries release about 800 million pink salmon fry or 3% of total pink salmon numbers in Pacific Rim. Extrapolation of PWS pink salmon biomass as a proportion of total nektonic biomass would be a tiny fraction of one percent.

McMillan J., et.al. *A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*[17]

This study synthesized findings from 206 peer-reviewed publications worldwide to examine the impact hatcheries have on wild salmonids. While the effects have been reported to range from adverse to beneficial, a substantial 70% of these studies reported adverse effects, whereas 13% recorded minimally adverse effects. These articles discuss various species across North America, Europe, and Asia, offering useful context and discussion points from 50 reviewed publications.

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[15] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

[16] Shuntov, V. P., Temnykh O., and Ivanov O. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon *(Oncorhynchus spp.).* Russian Journal of Marine Biology 43:1–28.

[17] McMillan J., et.al. A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids

The synthesis, originally composed of 11,000 research papers, was boiled down to a scorecard segregating the papers into categories - adverse, middling, and favorable. However, only a handful of these papers apply to Alaska, rendering percentage-based evaluation a rather peculiar methodology to gauge research validity. Most salmon research funding is directed towards the Pacific Northwest, known to yield negative outcomes due to the strategies employed aiming to rehabilitate wild salmon in the Columbia River Basin in particular. The forthcoming evaluation will largely encompass aggregated critiques of the Ruggerone and McMillan papers.

III. Alternative Research and Perspectives

Wertheimer A. & Heard B. 2018 *High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate*

As mentioned, the 2018 Wertheimer paper will be resubmitted as a separate public comment, although updated with a cover memorandum that highlights additional information which further supports our contentions contained herein. The most significant event that has changed since 2018 is the Marine Heat Wave (MHW) that encompassed 2016 – 2019 and significantly affected adult chum and to a lesser extent pink salmon returns and survival in 2020 – 2022. During this period there were four years in which there were five federal fishery disaster designations in Alaska. [18]

- S.E. Alaska, Norton Sound, Yukon River, Chignik, Kuskokwim salmon fisheries, 2020 & 2021
- Copper River and PWS salmon fisheries, 2018 & 2020
- Gulf of Alaska pink salmon fisheries in PWS, Kodiak, Chignik, Lower Cook Inlet, S.E. Alaska & Yakutat, 2016

Research by International Year of the Salmon (IYS) demonstrates a strong linkage between the MHW years and return years for chum salmon. These research results will be covered in a

[18] https://www.adfg.alaska.gov/index.cfm?adfg=hottopics.fisherydisasters

section to follow. Significantly, it's worth noting that salmon productivity varies regionally and locally in Alaska and across the Pacific Rim; an issue we will delve into in this document.

IV. Review of Research Papers and Possible Mechanistic Effects for Salmon Dynamics

Howard K., October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research.* A presentation to Board of Fisheries. [19] and International Year of the Salmon[20]

In her presentation to the Board of Fisheries in October 2023, Dr. Howard provided a balanced assessment of the latest studies regarding salmon abundance, winter range, and oceanic sampling conducted by the International Year of the Salmon (IYS) researcher group. She also reviewed significant findings reported by the Northern Hemisphere Pink Salmon (Expert Group), an international body former by NPAFC. Both the IYS and the Expert Group are recent initiatives by the NPAFC aimed at addressing data gaps in our understanding of salmonids. Particularly noteworthy is the significant gap regarding the winter range and location of salmonids in the North Pacific, a point that was encapsulated in Howard's oral report.

The prevailing scientific consensus is that diet overlap exists among salmonids and nektonic fishes and avians. This overlap correlates to variations in species growth patterns and abundance. High survival rates of one species can coincide with a decline in another. Likewise, when one species thrives in abundance, the growth of another may decrease. For instance, high abundance of odd-year pink salmon can affect the growth rate of sockeye salmon in their third year at sea. While this does not necessarily affect survival, it does impact growth and hence reproduction rates. Such abundance associations also seem to affect salmon age at maturity; when one species is abundant, another's age of maturity may increase. As shown in Oke, et.al.[21]

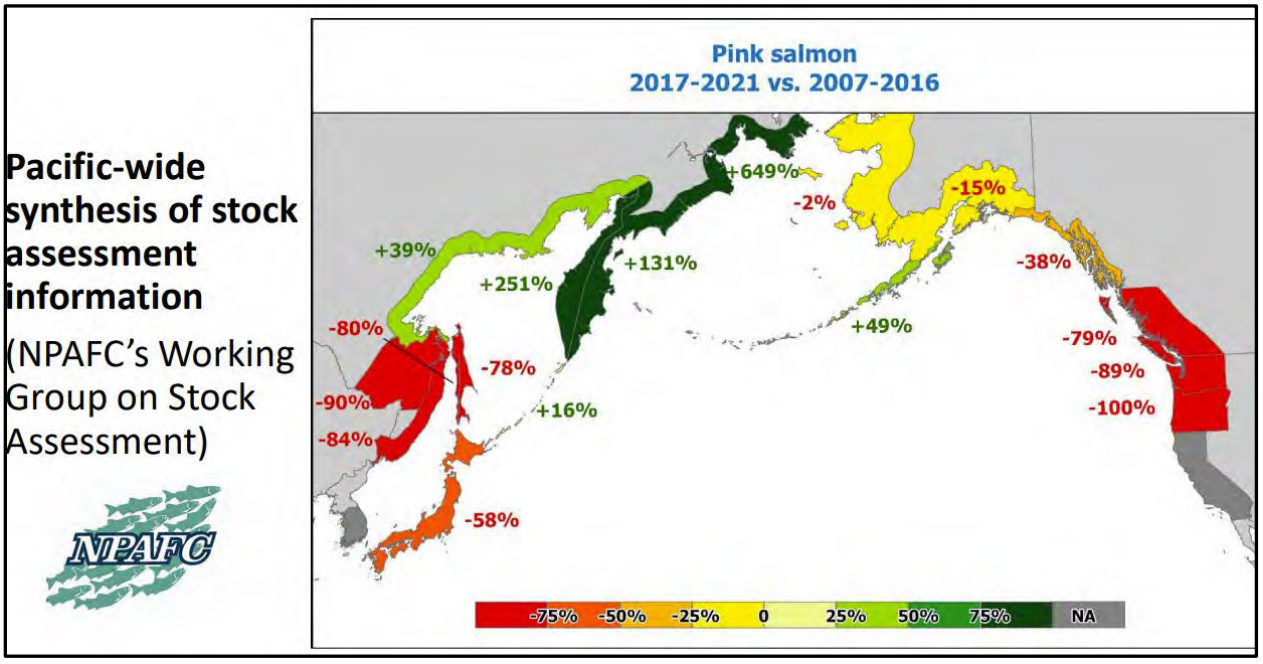
[19] Howard K**.,** Alaska Department of Fish and Game, October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research.* Presentation to Board of Fish

[20] https://yearofthesalmon.org/resources/

[21] Oke K., et.al. 2020 Recent declines in salmon body size impact ecosystems and fisheries

research, Alaska's pink and chum salmon may competitively impact coho salmon, irrespective of climate factors.

However, not all researchers agree on these findings. The Ruggerone paper and its proponents, predominantly based in the United States, argue that correlations between wild and hatchery pink salmon and the decline of other species present a problem. In contrast, the broader international research community remains unconvinced of these negative associations. To establish causality, mechanistic or direct evidence is crucial. Yet, the drive for funding and publication all too often leads to what is called by researchers as publication bias. Additionally, publication bias often results in nonnegative-relationships or null results not being published. The following discussion provides some perspective on the contrast between the proponent's arguments of corollary associations versus the body of research that points to drivers and/or mechanisms linked to empirical evidence.

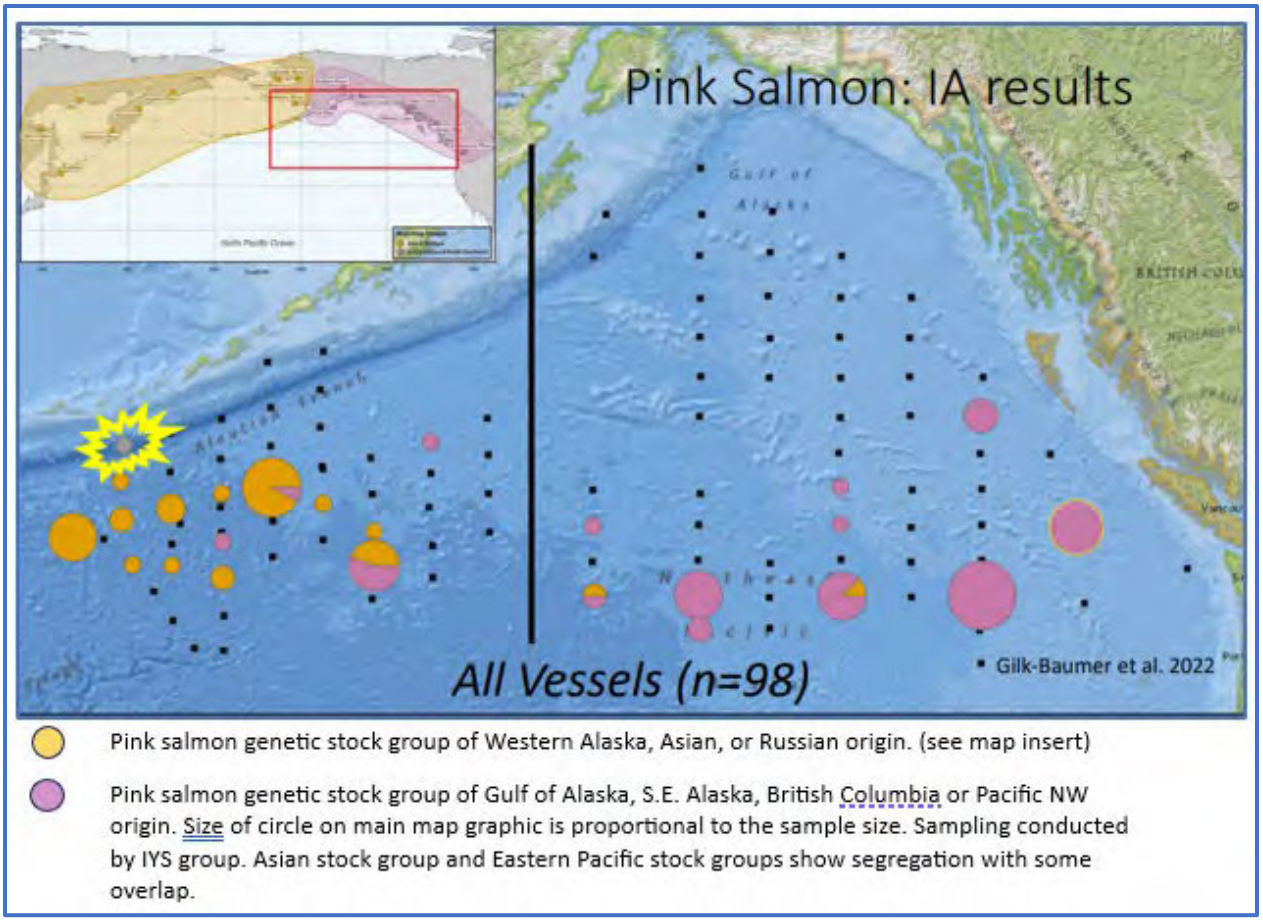


The Pacific Ocean, a vast expanse, is not uniform in terms of productivity, climate, temperature, and biological parameters. Evidence from the study of the Pacific Decadal Oscillation (PDO)[22]

[22] Mantua, N. et.al. 2001. The Pacific Decadal Oscillation

suggests significant shifts in productivity in the eastern Pacific, alternating between favoring the northeastern Pacific and the eastern Pacific south of British Columbia over different decades. The NPAFC's working group on pink salmon stock assessment observed significant shifts in pink salmon productivity across the Pacific Rim when comparing the period of 2017–2021 with that of 2007–2016. The accompanying map above illustrates these dramatic differences. Productivity of pink salmon in Russia increased two to six-fold, while in the Pacific Northwest (PNW), productivity declined by half. Most of Alaska also experienced a decline, albeit more modestly. It is worth noting again that during this period of decline, Alaska requested at least five federal disasters.

The International Year of the Salmon, which conducted research from 2018–2022, provided valuable information on salmonids' winter distribution across the Pacific from East to West. Genetic stock identification of salmon tissue samples taken across the Pacific revealed the country of origin, both wild and hatchery. This research sheds light on one of the mysteries of



the recent Yukon and Kuskokwim chum salmon decline. The Coastal Western Alaska Kodiak (CWAK) chum stock group (which includes Yukon, Kuskokwim, Bristol Bay, Norton Sound) were found to be unhealthy, with low fat content and empty stomachs for not just one winter, but two consecutive winters. These samples were taken during the Marine Heat Wave (MHW) years, which presaged the disastrous returns to the Yukon and Kuskokwim in 2020–2022.

Another crucial finding from the International Year of the Salmon (IYS) winter ocean studies is discernible from the map graphic presented above. The graphic clearly shows that pink salmon from Russia and Asia were primarily located in the western Pacific, while their Alaskan and Pacific Northwest (PNW) counterparts were predominantly in the eastern Pacific. There was some overlap, but it was minimal during the sampled years. **Shuntov et. al. observed that prey abundance for salmon was not a limiting factor.** It's worth noting that this period coincided with the all-time high of Russian and Central Asian pink salmon, as illustrated in the graphic on the preceding page. These geographical distribution patterns hold significant implications for understanding inter-species dynamics and potential competition for resources and underline the complex interplay of factors contributing to salmon performance across the Pacific.

North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group.[23]

In a section on *Competition and Interactions Between Pink Salmon and Other Species* from the report it states: "…..the ocean remains highly productive and pink salmon only consume a small fraction of the resources compared to more abundant species (e.g., walleye pollock). Pink salmon are also flexible foragers, eating a variety of prey and finding preferred feeding areas best suited to their traits. Indeed, the foraging areas and feeding habits among Pacific salmon species often indicate complimentary, rather than competitive, interactions."[24] This section included references that competition for prey can negatively affect other species at times.

[23] https://www.npafc.org/wp-content/uploads/technical-reports/Technical-Report-21.pdf. North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group

[24] https://www.npafc.org/wp-content/uploads/technical-reports/Technical-Report-21.pdf. North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group

Baumann, et.al 2014, *Diatom control of the autotrophic community and particle export in the eastern Bering Sea during the recent cold years (2008–2010)*[25]

A body of research conducted in the Bering Sea challenges assertions of pink salmon exercising top-down control, instead suggesting a cold-water control mechanism at work. This research focuses on examining mechanistic linkages to explain nutrient transportation during periods of cold water, offering potential explanations for the cause-and-effect dynamics. Its significance lies in potentially shedding light on why nutrient availability dwindles during warm, ice-free years.

The study's main finding suggests that during cold years, diatoms emerge as dominant primary producers and particle exporters in the eastern Bering Sea. Zooplankton fecal pellets also played a crucial role in the particle export dynamic. These diatoms, which constitute a minimum of 70% of the vertical flux of total Chlorophyll a (TChl a), are the primary algal class to be exported from the light-exposed upper layers of the ocean, or 'photic zone', regardless of the TChl a and Particulate Organic Carbon (POC) flux.

The extent of particle flux from early spring to late spring and early summer may be largely dictated by zooplankton grazing. Early summer particle export is likely associated with the sinking phenomenon, typically observed in spring, and the Marginal Ice Zone (MIZ) primary production.

Daly, et.al. *Potential for resource competition between juvenile groundfishes and salmon in the eastern Gulf of Alaska*, 2019 [26]

Evidence suggests that juvenile salmon, including pink salmon, were not causing a 'top-down' zooplankton resource bottleneck in the Gulf of Alaska. Based on the available zooplankton

[25] Matthew S. Baumann, S. Bradley Moran, Michael W. Lomas, Roger P. Kelly, Douglas W. Bell, and Jeffrey W. Krause Diatom control of the autotrophic community and particle export in the eastern Bering Sea during the recent cold years (2008–2010)

[26] Elizabeth A. Dalya, Jamal H. Moss, Emily Fergusson, Richard D. Brodeur Potential for resource competition between juvenile groundfishes and salmon in the eastern Gulf of Alaska. 2019

biomass, there appeared to be no reduction in the prey population due to excessive grazing by planktivorous (plankton-eating) juvenile fish where these prey were most abundant. Interestingly, the years 2010-2012 saw a significant increase in juvenile groundfish when the numbers of young, carnivorous salmon were lower. This raises questions about potential predation.

The paper explores these complex dynamics between juvenile groundfish and salmon in the Gulf of Alaska. It suggests that competition for prey (zooplankton) resources may be underway, potentially impacting the early marine growth and survival of these fish species, but the effect is not top-down control.

From the abstract of the paper

> "Neither the abundance nor stomach fullness of the juvenile planktivorous ground fishes or salmon correlated with station-level zooplankton biomass in 2012–13, **suggesting a lack of a resource bottleneck** (emphasis added) for these planktivores in these 2 years." and "Overall, during years when juvenile ground fishes survival was high, juvenile salmon survival was also high, suggesting sufficient food resources in the GOA".

Hunt and Stabeno, *Climate change and the control of energy flow in the southeastern Bering Sea*. 2002[27]

The Oscillating Control Hypothesis presented in this paper anticipates that the abundance of forage fish will be determined by a mix of bottom-up processes, (affected by the availability of zooplankton prey), and top-down processes, (influenced by predation by large fish-eating fish).

The shift of Bering Sea ice in spring dictates the occurrence of either an early ice-associated bloom in cold water or a late-spring open water bloom in relatively warmer water. Copepods, small crustaceans that serve as critical feed for young pollock, are sensitive to the water temperature in which they are developing. Consequently, copepod reproduction and the number of generations produced are notably higher in years with warm water spring bloom compared to cold water bloom years. This variation can significantly influence the growth and production of zooplankton, as well as the growth and survival rate of young fish.

[27] Hunt G., and Stabeno P. Climate Change and the control of energy flow in the southeastern Bering Sea 2022.

This study lends further evidence to the Ocean Climate Hypothesis, which envisages that the system should predominantly be **constrained by bottom-up fish recruitment** limitation during repeated cold springs associated with ice-formed blooms. Examining the environmental variability from the 1990s, the paper validates that attributes such as average depth temperatures are crucial for zooplankton and pollock. The study also notes a correlation between the biomass of adult pollock on the shelf and the productivity of Pribilof Island-nesting black-legged kittiwakes, a sea bird species whose presence often indicates a healthy fish population.

Arimitsu, et.al. *Heatwave-induced synchrony within forage fish portfolio disrupts energy flow to top pelagic predators.* 2021[28]

Contrary to expectations, during the recent anomalously warm conditions, which are thought to have resulted in top-down pressures controlling forage fish abundance in the northern Gulf of Alaska, **salmon were not the primary predators**.

This research paper delved into the impacts of the 2014-2016 Pacific marine heatwave on forage fish in the Gulf of Alaska. The researchers discovered that the measure of covariance among species within a community, a concept referred to as the 'portfolio effects' of forage fish species, could serve as an analytical framework for understanding the stability of ecosystem dynamics over time. They also found that the heatwave-induced extreme mortality of common murres was mitigated by the flexible foraging behavior of avian predators.

One critical finding underscores the vulnerability of fishes' demographic structure, which changes in response to size-selective removal processes, whether through predation, disease, or fishing. This change weakens the population's ability to buffer environmental variability, leading to poor recruitment and subsequently, low survival rates. It can also impact spawning dynamics as smaller, younger individuals, which produce fewer eggs, rise in population. The quantity of produced eggs, or fecundity, is strongly related to size.

[28] Arimitsu M., et.al. Heatwave-induced synchrony within forage fish portfolio disrupts energy flow to top pelagic predators 2021,

Sturdevant, M. et.al. 2011. *Lack of trophic competition among wild and hatchery juvenile chum salmon during early marine residence in Taku Inlet, Southeast Alaska* [29]

A research paper conducted a comparative analysis of the diets of wild and hatchery chum salmon in the littoral habitat of outer Taku Inlet, near Juneau, Alaska. Findings from the study revealed significant variances. The diet of wild chum salmon consisted of more insects, larvaceans, barnacle and euphausiid larvae, gammarids, large and small calanoids, and fish compared to their hatchery counterparts. Hatchery fry consumed similar prey but in different quantities, the first-year diet containing more gammarids and hyperiids than the wild fry, while in the second year consuming a higher proportion of calanoid copepods. The study also concluded that the diet composition of both wild and hatchery chum salmon showed more similarity within the same year than across different years. Further, the diets of these fish in the inner-middle locations of Taku Inlet showed more similarity than those in the outer area.

The research also observed an interesting trend in the condition of hatchery chum salmon. Upon release, these **hatchery fish were larger and had a higher energy density than the wild** salmon. However, in the early weeks post-release, as they adapted to a diet constituted by wild prey, they exhibited a **drop in their condition**. **Approximately forty days later, their energy densities had not only recovered but had also aligned with those of the wild salmon.** Importantly, they showed higher energy densities as compared to the time of release in Taku Inlet. This research provides insights that could inform methods to improve the adaptability and survival rate of hatchery chum salmon post-release.

[29] Lack of trophic competition among wild and hatchery juvenile chum salmon during early marine residence in Taku Inlet, Southeast Alaska 2011. Sturdevant M., Fergusson E., Hillgruber N., Reese C., Orsi J., Focht R., Wertheimer A., & Smoker B.

Batten S., 2022. *Responses of Gulf of Alaska plankton communities to a marine heat wave.*[30]

The Batten paper published in 2022 postulates possible mechanisms causing lower productivity brought on by the marine heat wave (MHW) in the North Pacific Gulf of Alaska. The abstract lays out their findings:

> Time series of phytoplankton and zooplankton collected from the shelf and oceanic northern Gulf of Alaska from 2000 to 2018 are examined to describe changes in abundance and composition that occurred during the 2014–2016 marine heat wave (MHW). Zooplankton abundances were very high on the shelf during the MHW, particularly copepods and pteropods, while large diatoms were very low. Community Temperature Indices (CTI) were derived and showed significant, positive correlations with temperature for both trophic levels on the shelf and in the deep ocean. While no common taxa disappeared from the communities, there were changes in relative abundance that contributed to the increase in CTI. Additionally, some rarer taxa were not found during or after the MHW, and fewer new taxa appeared with its onset. There is thus evidence for a change in ecosystem functioning in the lower trophic levels with the northeast Pacific MHW bringing; lower plankton taxonomic richness, a bias towards species that prefer warm conditions, increased effects down the food chain, likely exerted by changes in forage fish, and uncertainty in data from 2017 to 2018 as to whether plankton metrics had, or would, return to pre-MHW values.

Orsi J., 2005. *Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions*[31]

The study estimated the total abundance of hatchery and wild chum salmon in northern southeast Alaska region. The total prey consumption varied depending on mortality rate assumptions, but the salient point is **only a small percentage of available zooplankton was consumed by juvenile chum salmon**. The study noted the need for additional research to determine physiological input parameters and improve abundance and mortality estimates. The abstract details the scope of work, findings and possible limitations:

> Bioenergetics modeling was used to estimate zooplankton prey consumption of hatchery and unmarked stocks of juvenile chum salmon (Oncorhynchus keta) migrating seaward in littoral (nearshore) and neritic (epipelagic offshore) marine habitats of southeastern Alaska. A series of model runs were completed using biophysical data collected in Icy

[30] Batten S., Ostle C., Helaouet P., Walne A. 2022. Responses of Gulf of Alaska plankton communities to a marine heat wave.

[31] Orsi J., Wertheimer A., Sturdevant M., Fergusson E., Mortensen D., & Wing B. 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions

Strait, a regional salmon migration corridor, in May, June, July, August, and September of 2001. These data included a temperature (1-m surface versus surface to 20-m average), zooplankton standing crop (surface to 20-m depth versus entire water column), chum salmon diet (percent weight of prey type consumed), energy densities, and weight. Known numbers of hatchery releases were used in a cohort reconstruction model to estimate total abundance of hatchery and wild chum salmon in the northern region of southeastern Alaska, given average survival to adults and for two different (low and high) early marine littoral mortality rate assumptions. **Total prey consumption was relatively insensitive** to temperature differences associated with the depths potentially utilized by juvenile chum salmon. However, the magnitudes and temporal patterns of total prey consumed differed dramatically between the low and high mortality rate assumptions. Daily consumption rates from the bioenergetics model and CPUE abundance from sampling in Icy Strait were used to estimate amount and percentage of zooplankton standing crop consumed by mixed stocks of chum salmon. We estimated that only **a small percentage of the available zooplankton was consumed by juvenile chum salmon**, even during peak abundances of marked hatchery and unmarked mixed stocks in July. Total daily consumption of zooplankton by all stock groups of juvenile chum salmon was estimated to be between 330 and 1764 g/km2d1 from June to September in the neritic habitat of Icy Strait. As with any modeling exercise, model outputs can be misleading if input parameters and underlying assumptions are not valid; therefore, additional studies are warranted, especially to determine physiological input parameters, and to improve abundance and mortality estimates specific to juvenile chum salmon. Future bioenergetics modeling is also needed to evaluate consumption by the highly abundant, vertically migrating planktivors that co-occurred in our study; we suggest that these fishes have a greater impact on the zooplankton standing crop in Icy Strait than do hatchery stock groups of juvenile chum salmon.

Shuntov, V. 2017. *On the persistence of stereotypes concerning the marine ecology of Pacific salmon (Oncorhynchus spp.)*.[32]

Shuntov et.al. discusses marine ecology of Pacific salmon, including their interaction with sea surface temperatures, food shortages, competition, effect on other species, and habitat restrictions. These Western-centric ideas and syntheses of data are contrary to the research findings from the Pacific Research Fisheries Center (TINRO Russia). Pacific salmon have a wide range of habitats and can adapt to various temperatures. They can migrate vertically and have a diverse diet. These salmon are dispersed and can satisfy their dietary needs across large areas with low prey concentrations. "**The total biomass of all the Pacific salmon species** in the North Pacific is not greater than 4–5 million t (including 1.5–2.0 million t in Russian waters). In stark

[32] Shuntov, V. P., Temnykh O., and Ivanov O. 2017. *On the persistence of stereotypes concerning the marine ecology of Pacific salmon (Oncorhynchus spp.).* Russian Journal of Marine Biology 43:1–28.

contrast, the biomass of other common nekton species is estimated at a few hundred million tons. **Salmon account for 1.0–5.0% of the total amount of food consumed by nekton** in the epipelagic layer of the western Bering Sea. In summary, they play a moderate role in the food webs of subarctic waters based on their research delineated in the abstract:

> Some of the views on the marine ecology of Pacific salmon (Oncorhynchus spp.) that were popular in the second half of the 20th century are discussed critically: the absolutization of the influence of sea surface temperature on distribution of salmon and strength of their year classes, as well as the conclusions on the shortage of food (particularly in winter) and the fierce competition for food, the "suppression" of other salmon species and one adjacent broodline by pink salmon, the limited carrying capacity of the pelagic zone of subarctic ocean waters for salmon, the distortion of the structure of epipelagic communities in ecosystems of the North Pacific due to the large-scale stock enhancement of chum salmon, etc. Most of these ideas have not been confirmed by the data of long-term monitoring conducted in the form of complex marine expeditions by the Pacific Research Fisheries Center (TINRO Center) in the Far-Eastern Seas and adjacent North Pacific waters since the 1980s. The data show that Pacific salmon are ecologically very flexible species with a wider temperature range of habitat than was previously believed. Salmon are able to make considerable vertical migrations, easily crossing zones of sharp temperature gradient and different water masses. Having the wide feeding spectra and being dispersed (as non-schooling fish) when feeding in the sea and ocean, they successfully satisfy their dietary needs in vast areas even with relatively low concentrations of prey organisms (macroplankton and small nekton). The total biomass of all the Pacific salmon species in the North Pacific is not greater than 4–5 million t (including 1.5–2.0 million t in Russian waters), whereas the biomass of other common species of nekton is a few hundreds of millions of tons. Salmon account for 1.0–5.0% of the total amount of food consumed by nekton in the epipelagic layer of the western Bering Sea, 0.5–1.0% in the Sea of Okhotsk, **less than 1% in the ocean waters off the Kuril Islands, and 5.0–15.0% in the ocean waters off East Kamchatka**. Thus, the role of Pacific salmon in the trophic webs of subarctic waters is rather moderate. Therefore, neither pink nor chum salmon can be considered as the species responsible for the large reorganization in ecosystems and the population fluctuations in other common nekton species.

V. Precautionary approach

The State of Alaska statutes, alongside Alaska Department of Fish and Game regulations, has adopted a precautionary approach to salmon enhancement. Concurrently, the PNP associations have cooperated closely with the department to develop programs that minimize interactions with wild stocks.

The State captured concerns about the possible local effects of introgression – gene flow from hatchery fish to wild fish - in its 1985 genetics policy.[33] In 2011, in response to the request from the PNPs to the Commissioner of Fish and Game, a science panel was established to investigate the introgression caused by hatchery strays into wild stock streams. After twelve years of consistent study and monetary investment of over $20 million, this science panel has been actively sharing its findings with the Board and the wider public. Discussions are currently underway between the ADF&G and PNP operators about the next phase of research.

VI. Concluding Remarks

Over the past 25 years, Alaska salmon have demonstrated remarkable abundance (except for Chinook) which has raised concerns about possible exceedances of the ocean's carrying capacity. The high abundance and variability of these salmon populations appear to be largely due to oceanic survival conditions rather than density-dependent interactions. Over the last quarter-century, Alaska's salmon harvest has maintained consistently high yields from wild stocks, supplemented by substantial contributions from hatchery fish. While density-dependent interactions have been observed at various salmon life stages and in different habitats, these interactions have not inhibited the salmon population's recovery from its 1970's low levels.

However, fluctuating climate patterns and oceanic events, such as marine heatwaves in the Gulf of Alaska, potentially have wide-reaching implications for salmon populations. These events underscore the unpredictable nature of ocean conditions that influence salmon at both local and regional scales.

[33] https://www.adfg.alaska.gov/static/fishing/PDFs/research/genetics_finfish_policy.pdf

Empirical support in favor of hatchery fish comes from the enhancement programs in Prince William Sound (PWS) and Southeast Alaska. Despite variable productivity over the past few years, both wild and hatchery pink salmon have closely tracked the odd-even brood line patterns in PWS in the past six years, the average even-year return for wild pinks in PWS has exceeded five million, a considerable increase from the two-million average wild return twenty years ago. By targeting hatchery fish, wild escapement goals are being met, resulting in new record highs for the harvest and production of both hatchery and wild pink salmon. This suggests that the large-scale release and return of hatchery pink salmon have not undermined the production potential of wild stocks, irrespective of their high or low abundance. A similar story holds true for southeast Alaska wild and hatchery chum salmon.

Thank you for your time, your interest, and most importantly, your dedication to ensuring an enduring legacy for future generations of salmon and the people of Alaska. We appreciate your commitment to understanding the complex dynamics of our freshwater and marine ecosystems and look forward to continuing an exchange of knowledge and perspectives.

Sincerely,

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Prince William Sound Aquaculture Corporation
Geoff Clark, General Manager/CEO

Douglas Island Pink & Chum
Katie Harms, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Northern Southeast Regional Aquaculture Association
Scott Wagner, General Manager

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

February 02, 2024

Dear Chairman Wood and Board of Fisheries members:

I was born and raised in this state. I learned to fish on the Little Sue and Kenai rivers. It has always been a very cherished part of my relationship with my father and brother but also now one I cherish with my friends especially because I got the honor of teaching them how to fish. My dad also now has a cabin with Kenai access and it is where I spend nearly every weekend in the summer. Working on the house and fishing with my old man. It is also my inheritance and where I plan to retire someday. In the time I have lived in this state (nearly 27 years now) I have only ever caught TWO kings. One from the ocean near Ninilchik and one by accident in Campbell creek. I find it extremely sad that as such an avid fisher person I have not ONCE caught a Kenai king. As a child it was a dream and a goal. As an adult I purposely do not fish for kings in the Kenai because I know it is better if I don't. I want there to be kings - particularly the massive, now legendary kings of lore that are 50+ pounds! But that will not happen without stricter regulations on commercial fishing and a halt on all sport fishing of kings until the population is at a sustainable level.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Amanda Allard
Anchorage, AK

Submitted by: Lance Alldrin
Community of Residence: Chico, CA/Nikiski AK

Proposal 92 SUPPORT: When the East Forelands exemption was put in place during the 2016 meeting, it was a board generated proposal. This exemption was only fished one day during that 3 yr regulatory cycle. Data shows that the E.F. subsection catches less than 1.5% of the total kings caught (all sizes and origins), the lowest of any subsection in the ESSN (per currently published data on the F&G comm fish website).

Proposal 96 SUPPORT: I have fished flagged nets both intentionally and unintentionally while fishing prior seasons in subsections other than my current sub section (East Forelands). I have NEVER caught a king and I believe this is due to the fact that kings will often get pressed into a gill net by the pressure from the current and with a flagged net, the king would just "skip" down the length of the net without getting gilled (unlike a smaller fish like a sockeye would). Of all the proposals submitted, flagged nets, dip nets and a beach seine are the ONLY methods presented that would either not catch kings or would allow the live removal of kings immediately from the net. I would like to see the set net fishery given one of these three options within the paired restrictions PRIOR to being shut down for the season.

Proposal 107 OPPOSE: There are many areas in the ESSN set net fishery where due to the strength of the current or depth of the water, fishing one half mile or more off shore is just not possible.

Proposal 112 OPPOSE: There is no reason to raise the upper limit of the sockeye escapement goal as there is no way to control the upper end if the ESSN fishery is not fishing.

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 79: Support	Proposal 80: Support	Proposal 81: Support	Proposal 82: Support
Proposal 84: Support	Proposal 85: Support	Proposal 86: Support	Proposal 87: Support
Proposal 90: Oppose	Proposal 91: Support	Proposal 92: Support	Proposal 93: Support
Proposal 94: Support	Proposal 96: Support	Proposal 97: Support	Proposal 98: Support
Proposal 99: Support	Proposal 100: Support	Proposal 101: Oppose	Proposal 102: Support
Proposal 107: Oppose	Proposal 108: Support	Proposal 110: Support	Proposal 111: Support
Proposal 112: Oppose	Proposal 113: Support	Proposal 115: Support	Proposal 116: Support
Proposal 130: Support	Proposal 132: Support	Proposal 133: Support	Proposal 134: Support
Proposal 137: Oppose	Proposal 138: Support	Proposal 139: Support	Proposal 141: Oppose
Proposal 142: Support	Proposal 143: Support	Proposal 148: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 174: Oppose	Proposal 189: Support	Proposal 190: Support
Proposal 191: Oppose	Proposal 193: Support	Proposal 195: Support	

Submitted by: Ben Allen
Community of Residence: Wasilla, Alaska

Proposal 238

Strongly Opposed-

The author of this proposal is documenting his observations of habitat concerns, in close proximity to the Little Susitna Public Use Facility of the Little Susitna River, not the whole watershed. The Little Susitna River is a 110 mile river that flows from its headwaters at Hatchers Pass. The Little Susitna River is an intact watershed that largely flows through an untrammeled landscape. It would be arbitrary and capricious, to impose a horsepower restriction to an entire watershed of which has extremely poor public access, due to the ambiguous observations of one individual, for less than 1% of the total watershed bank habitat. The Little Susitna River is astronomically different from the Kenai River referenced in this proposal. The Little Susitna River as a whole has extremely low sport fishing participation and recreation, largely due to lack of access and opportunity to catch and harvest salmon– due to a decline in silver and king salmon abundance. The entire Susitna drainage and Knik Arm is currently experiencing poor returns of King and Coho salmon, including streams such as Willow Creek, which has very minimal power boat usage. Poor returns are occurring on a much larger scale than the Little Susitna River. Data confirming a steep decline in boating participation, fishing and public use on the Little Susitna River out of the LSPUF (the only major access point on the Little Susitna River) can be obtained from Alaska State Parks and ADF&G. The Little Susitna River has 1 maintained public access for motor boats–very different from the Kenai. The Kenai River is a lot deeper than the Little Susitna River and can be safely operated with a prop driven vessel contrasting the Little Susitna River, where jet propulsion allows for safe travel and access.

At least 85% of the boats currently operating on the Little Susitna River would not be able to operate with a 50 horsepower head (as on the Kenai) outboard with a jet. Due to inflation and increasing costs of motors, the majority of users will not be able to afford repowering the boats that can be repowered. Many users would need to purchase a new boat and motor to participate. Who would even make a substantial investment in new equipment to participate in a highly unpredictable, highly regulated and very limited declining fishery? A horsepower restriction would limit and in most cases prohibit guides from using this venue, due to the inability to transport passengers due to lack of power for their vessel. Guides and their customers currently pay for a greater percentage of season and day use fees that allow the park to be open.

My biased opinion is that this proposal makes an explicit attempt to decrease participation at this venue for their own benefit. The fact is that the State of Alaska provides an abundance of strictly bank (no boats) accessible salmon fishing opportunities in the Matsu Valley in contrast to boating opportunities.

Imposing a horsepower restriction on the Little Susitna River at this time, without any other new access opportunities, would be devastating for the majority of sportfishermen, hunters and recreationists on the Little Susitna River. At this point there is no way to float the Little Susitna River in less than 2 days (to fish the river effectively- 4 days is necessary), since the nearest put in is at Houston 41 river miles upstream of the LSPUF. Downstream of the LSPUF at river mile 28.5 there is no take out. A horsepower restriction, would result in an increase of illegal off road vehicle use within the Susitna Flats State Game Refuge and legal and illegal off road vehicles throughout the watershed, resulting in significant impacts to the watershed, that would be very difficult and expensive to quantify.

The Matsu Valley has very limited opportunity to catch and harvest salmon from a boat within 45 minutes of Wasilla and Palmer. Elderly and users with disabilities who depend on boat access to participate in salmon fisheries will be severely hurt if this proposal is approved.

This proposal is speculative, providing no data, no quantitative and qualitative observation, or meaningful information suggesting a horsepower restriction will improve watershed health and habitat. Feeling a

horsepower restriction is necessary because an individual is observing waves near a boat ramp, does not justify establishing this regulation. The LSPUF was established, and funded primarily for power boat access.

My personal opinion is I'd rather hike, or float the river. But to access and enjoy the majority of the Little Susitna River, a powerboat is necessary. Given the current access situation, powerboating, without horsepower restrictions, provides the least impactful use of the Little Susitna River resource, for current users, being predominantly Alaskans and some visitors to enjoy the Little Susitna River in its entirety.

With boat participation to be at an all time low in the history of this fishery since the establishment of the LSPUF, it's honestly pointless to even have the conversation about boating restrictions. Most days in the summer there are rarely more than 2 boats using the river and often there are none. The conversation should be how do we get more fish in the river, for the benefit of everyone.

And riverboat safety and operation of which a horsepower restriction does not solve.

More powerboats access the Kenai River from the Pillar's State Park Boat Launch and Eagle Rock, in 1 day in July, than powerboats on the Little Susitna River for the entire season, which can be verified with Alaska State Parks.

Proposal 238: Oppose

PC8

Submitted by: Oliver Ancans
Community of Residence: Eagle River, AK

Proposal 29

I fully support the closure of the guided helicopter fishing for the accessible rivers on the lower Kenai peninsula. Many anglers have had issues with the helicopter landing within a very close vicinity and dropping off clients. These rivers are all very accessible on foot, and there is no need for guided helicopter fishing. As these river become more popular and native steelhead numbers continue to decline worldwide, these special fisheries must become more protected and guided helicopter fishing is not only unnecessary, it is now becoming a matter of can is be considered "fair chase".

PC9

Submitted by: Kasiana Anderson
Community of Residence: Palmer, Alaska

I have grown up around commercial fishing my whole life. I am a 4th generation Alaska Native woman who is apart of the Eastside Setnet Fishery and hope to continue the tradition with my own family one day. However, that cannot happen when we keep getting shut down without hearing us out. In 2023, the Eastside Setnet Fishery was the only area shut down for the whole season. There was no way for us to fight against it and let our voices be heard. Many families were left without anything to support their families and businesses. I would like to see a change for the ESSN and get more positive outcomes.

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support

Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 151: Support	Proposal 152: Support	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose
Proposal 163: Support	Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 176: Support	Proposal 177: Support	Proposal 178: Support
Proposal 179: Support	Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose
Proposal 185: Support	Proposal 186: Support	Proposal 189: Support	Proposal 190: Support
Proposal 191: Oppose	Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose
Proposal 195: Support	Proposal 196: Support	Proposal 197: Support	Proposal 198: Support
Proposal 199: Support	Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose
Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose
Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose
Proposal 215: Support	Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose
Proposal 232: Oppose			

PC10

Submitted by: Shayla Anderson
Community of Residence: Mukilteo, WA

To the Board of Fisheries:

Commercial fishing means the absolute world to me and my family. It means working hard, along side my parents, brothers and children to continue my Grandfather's and Great Grandfather's legacy and to provide wild salmon to our country. The life skills, memories and joy commercial fishing brings me is irreplaceable. I am a strong, hardworking and tough woman today because of commercial fishing and the thought of my children not being able to learn those same skills is the worst heartbreak there could be. My hope and dream is for the current and future generations is to be able to have the opportunity to harvest excess sockeye salmon entering the Kenai River.

The actions taken at the 2020 BOF meeting to protect late-run Kenai king salmon, created an unattainable Optimum Escapement Goal (OEG) which in turn closed the ESSN 2023 season, leaving many 100 year old commercial fishing businesses without the opportunity to harvest the excess sockeye salmon to feed the world, without opportunity to pay their bills and support their families.

The Optimum Escapement Goal (OEG) adopted in 2020 has closed the fishery and businesses cannot survive a fishery that gets ZERO opportunity based on a small harvest of a non-target stock of Kings.

The pairings in place are NOT equitable and do not share the same burden of conservation among all user groups.

Interaction with King Salmon happens in EVERY other fishery in Upper Cook Inlet that harvests Kenai and Kasilof sockeye and ONLY, the Eastside Setnet Fishery, was left with ZERO opportunity in 2023.

I believe that there is some opportunity for harvest in the ESSN fishery between the Large King Sustainable Escapement Goal (SEG) 13,500-27,000 and Optimum Escapement Goal (OEG) 15,000-30,000.

I strongly oppose proposals 90 and 106, in addition to proposals: 101, 112, 141, 150, 153, 154, 155, 156, 157, 158, 162, 168, 169, 170, 171, 172, 174, 183, 191, 192, 193, 194, 203, 205, 207, 208, 209, 210, 212, 213, 214, 217, 230, 231, 232.

I support proposals 77, 80, 81, 85, 86, 87, 88, 91, 97, 100, 102, 103, 110, 114, 116, 117, 119, 120, 128, 130, 133, 144, 145, 146, 147, 148, 149, 151, 152, 160, 161, 163, 164, 173, 176, 177, 178, 179, 180, 181, 185, 186, 189, 190, 195, 196, 197, 198, 199, 200, 211, 215.

I know that we can all share the resource and I trust that you will make the right decision for all user groups at this meeting. provide wild salmon to the world with that same joy and happiness it brings me. Commercial fishing on Salamatof Beach is my livelihood.

Sincerely,

Shayla Anderson (3rd Generation Commercial Fisherman and Kenaitze Tribal Member)

Proposal 77: Support	Proposal 80: Support	Proposal 81: Support	Proposal 85: Support
Proposal 86: Support	Proposal 87: Support	Proposal 88: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 97: Support	Proposal 100: Support	Proposal 101: Oppose
Proposal 102: Support	Proposal 103: Support	Proposal 106: Oppose	Proposal 110: Support
Proposal 112: Oppose	Proposal 114: Support	Proposal 116: Support	Proposal 117: Support
Proposal 119: Support	Proposal 120: Support	Proposal 128: Support	Proposal 130: Support
Proposal 133: Support	Proposal 141: Oppose	Proposal 144: Support	Proposal 145: Support
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Support
Proposal 150: Oppose	Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose
Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 168: Oppose	Proposal 169: Oppose	Proposal 170: Oppose
Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support	Proposal 174: Oppose
Proposal 176: Support	Proposal 177: Support	Proposal 178: Support	Proposal 179: Support
Proposal 180: Support	Proposal 181: Support	Proposal 183: Oppose	Proposal 185: Support
Proposal 186: Support	Proposal 189: Support	Proposal 190: Support	Proposal 191: Oppose
Proposal 192: Oppose	Proposal 193: Oppose	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 198: Support	Proposal 199: Support
Proposal 200: Support	Proposal 203: Oppose	Proposal 205: Oppose	Proposal 207: Oppose
Proposal 208: Oppose	Proposal 209: Oppose	Proposal 210: Oppose	Proposal 211: Support
Proposal 212: Oppose	Proposal 213: Oppose	Proposal 214: Oppose	Proposal 215: Support
Proposal 217: Oppose	Proposal 230: Oppose	Proposal 231: Oppose	Proposal 232: Oppose

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PC11

Submitted by: Dale Ballard
Community of Residence: Troutdale, OR

Re.- Proposal 83. I strongly support the tenets as stated in the document prepared by Francis Estalilla. His recommendations are very well thought out and I believe offers the best chance of recovery for the large fish of the Kenai River. Any action that lessens the Optimum Escapement Goal for these fish is a declaration of their impending demise. Furthermore, I strongly urge until such time the Kenai Kings reach self sustaining levels on both early and late run kings, in season regulations adopt as permanent rule, no retention of kings until sonar counts indicate some retention could be allowed without going under the OEG.

Proposal 83: Support

Dr. William Bechtol - Public comment supporting Proposal 216

PROPOSAL 216 - Reduce the commercial smelt guideline harvest level in Upper Cook from 200 tons to 100 tons.

My comments address the following aspects with further details below:

Dr. William Bechtol

1. The Board of Fisheries established a Forage Fish policy to consider the ecosystem role played by forage species such as eulachon.
2. Eulachon are an important forage item for many species, including endangered Cook Inlet beluga whales, in both fresh and salt waters.
3. The eulachon population spawning in the Susitna River has little assessment data.
4. The existing GHL is arbitrary.
5. Climate change is affecting productivity in freshwater and marine ecosystems, often in ways we cannot anticipate, and a precautionary approach to management is warranted.

1. The Forage Fish Management Plan (5 AAC 39.212) recognizes the importance of forage fish, specifically including eulachon, as ecosystem components critical to higher trophic levels. Previous Board of Fisheries discussions (e.g., 2017 meeting) raised concerns about how eulachon harvests may impact rebuilding of endangered Cook Inlet beluga whales (CIBW). But there has been little recognition of eulachon as an ecosystem component in Cook Inlet.

2. Eulachon primarily feed on plankton, euphausiids, mysids, and amphipods. An oil-rich prey (15-20% oil content), eulachon are consumed by numerous mammals, birds, and fish (Gustafson et al. 2010). Pinnipeds Stellar sea lions and northern fur and harbor seals prey on eulachon, with nonpinniped predators including humpback, orca, and beluga whales, harbor and Dall's porpoises, and Pacific white-sided dolphins, and terrestrial mammals such as river otters, mink, and bears likely feed on eulachon during spawning events. Birds preying on live and dead eulachon include gulls, terns, ducks, bald eagles, shorebirds, corvids, and other birds. Similarly, fish preying on different eulachon life stages in fresh and salt waters include spiny dogfish, Pacific cod, walleye pollock, Pacific halibut, sablefish, rockfish, arrowtooth flounder, Pacific herring, surf smelt, Pacific sand lance, kelp greenling, three-spine stickleback, steelhead, all five Pacific salmon species, and Dolly Varden.

   Eulachon are a critical prey for endangered CIBW emerging from a winter with limited food resources and entering a spring period of birthing and nursing (NMFS 2016). As a distinct population segment in Upper Cook Inlet, estimates of CIBW declined 2.3%/year from 2008 to 2018, then increased less than 1%/year to 2022. Through spring feeding on eulachon, CIBW start to rebuild their energy reserves, followed by feeding on king and coho salmon during the summer. Recent declines in king and coho salmon populations make spring eulachon even more important, particularly for pregnant and lactating females.

3. Despite the relatively long fishery history, there have been few assessments of the Susitna River eulachon population: (1) a 1982–1984 project used gillnets to assess run timing and collect age, sex, and size (ASL) data, and evaluated spawning habitat (Barrett et al. 1984; Vincent-Lang and Queral 1984); (2) a 2013 project used hydroacoustics (sonar) to develop an

index of abundance and run timing and collected ASL data (HDR and LGL 2014); and (3) a 2016 ADF&G project estimated spawning abundance and collected ASL data (Willette and DeCino 2023). Projects 1 and 2 were part of the Susitna-Hydro dam studies.

The 2016 project indirectly estimated eulachon escapement by counting eulachon larvae moving downstream after spawning and extrapolating fecundity of adult eulachon migrating upstream (Willette and DeCino 2023). Planned as a three-year study, future years were cancelled, but the board increased the eulachon commercial GHL to 200 tons in 2017. The 200-ton commercial harvest cap has remained since 2017 without additional assessments.

Living 3–5 years, eulachon likely exhibit wide abundance swings based on spawning conditions, larval rearing conditions, and the marine environment. Eulachon population estimates in nearby waters of Lower Cook Inlet and the Northern Gulf of Alaska declined in recent years, but updated abundance data are not available for Upper Cook Inlet.

4. As a relatively short-lived, anadromous, species, eulachon spend their lives in the marine environment except for the spring spawning period. Commercial eulachon harvests in Upper Cook Inlet initially occurred in 1978, 1980, and 1998 with respective catches of 300, 4,000, and 18,900 pounds (Table 1; Shields 2005, 2006; Lipka and Stumpf 2024; L. Stumpf, ADF&G, per. com.). In 1998, ADF&G recommended an arbitrary 50-ton (100,000-pound) harvest limit for the Upper Cook Inlet commercial smelt fishery, resulting in a 1999 commercial harvest of 50 tons. Development of the Forage Fish Management Plan (5 AAC 39.212) closed the commercial fishery in Upper Cook Inlet from 2000 to 2004. With adoption of the Cook Inlet Smelt Fishery Management Plan (5 AAC 21.505), the commercial fishery reopened in 2005 with a 100-ton (200,000-pound) GHL, only hand-operated dip nets, and the intent to maintain this GHL until a general assessment of stock strength could be made. Based on the 2016 ADF&G study and a 2017 proposal, the board increased the GHL to 200 tons (400,000 pounds) in 2017. Personal use harvests of eulachon from the Susitna River do not appear to be informative for stock assessment, and ASL data are only opportunistically collected from the commercial harvest. Thus, the GHL increased from 50 to 200 tons over the past 25 years without a consistent assessment of eulachon population changes.

5. Climate change is altering freshwater and marine productivity. We lack consistent stock assessment data for Susitna River eulachon, making it difficult to consider climate change impacts on Susitna River eulachon and higher trophic level species that depend on eulachon.

Summary – The commercial fishery for eulachon spawning in Upper Cook Inlet, primarily in the Susitna River, dates to 1978 with the GHL, reported as smelt, increasing from 50 tons to 100 tons to 200 tons. Eulachon serve as a major prey item for a wide variety of birds, fish, and mammals, including endangered CIBW. Being relatively short-lived, eulachon might be expected to undergo periodic and dramatic population fluctuations. Yet there is no annual stock assessment of the Susitna River eulachon population, and there have only been three formal studies that examined age, sex, and length and examined run timing based on CPUE indices, although the sampling gear differed for each study. In the absence of consistent eulachon assessments, a reduction of the commercial eulachon harvest cap to 100 tons is warranted as a precautionary approach to protect the eulachon population and for ecosystem considerations.

Table 1. Commercial eulachon harvest and effort in Upper Cook Inlet, 1978–2023.

Year	GHL (tons)	Harvest		Permits
		Pounds	Tons	
1978	NA	300	0.2	NA
1980	NA	4,000	2.0	NA
1998	50	18,610	9.3	2
1999	50	100,000	50.0	NA
2005	100	0	0	8
2006	100	90,783	45.4	8
2007	100	125,044	62.5	11
2008	100	127,365	63.7	6
2009	100	78,258	39.1	6
2010	100	126,135	63.1	3
2011	100	201,570	100.8	5
2012	100	195,910	98.0	4
2013	100	190,830	95.4	4
2014	100	198,814	99.4	4
2015	100	213,934	107.0	4
2016	100	191,536	95.8	4
2017	200	18,685	9.3	<3
2018	200	382,967	191.5	4
2019	200	389,473	194.6	6
2020	200	423,613	211.8	7
2021	200	444,838	222.4	7
2022	200	335,494	167.7	7
2023	200	177,588	88.8	5
Average		201,572	100.8	5.2
St.Dev.		129,246	64.6	2.3

NA – Not available; Sources: Shields 2005, 2006; Lipka and Stumpf 2024; L. Stumpf, ADF&G, per. com.

References:

Barrett, B.M., F.M. Thompson, and S.N. Wick, 1984. Adult anadromous fish investigations; May-October, 1983. A1aska Department of Fish and Game/Susitna Hydro Aquatic Studies Program. Anchorage, Alaska.

Gustafson, R.G., M.J. Ford, D. Teel, and J.S. Drake. 2010. Status review of eulachon (*Thaleichthys pacificus*) in Washington, Oregon, and California. U.S. Dept. Commer., NOAA Tech. Memo. NMFS-NWFSC-105, 360 p.

HDR and LGL. 2014. Eulachon run timing, distribution, and spawning in the Susitna River, Study Plan Section 9.16: Initial Study Report. Susitna-Watana Hydroelectric Project, FERC No. 14241.

Lipka, C., and L. Stumpf. 2024. Upper Cook Inlet commercial fisheries annual management report, 2022. Alaska Department of Fish and Game, Fishery Management Report No. 24-04, Anchorage.

National Marine Fisheries Service (NMFS). 2016. Recovery plan for the Cook Inlet beluga whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Region, Protected Resources Division, Juneau, AK.

Shields, P. 2005. Upper Cook Inlet commercial herring and smelt fisheries through 2004. Alaska Department of Fish and Game, Special Publication No. 05-14, Anchorage.

Shields, P. 2006. Upper Cook Inlet commercial fisheries annual management report, 2005. Alaska Department of Fish and Game, Fishery Management Report No. 06-42, Anchorage.

Vincent-Lang, D.S., and I. Queral. 1984. Eulachon spawning in the lower Susitna River. Chapter 5 in C.C. Estes, and D.S. Vincent-Lang (eds.). Aquatic habitat and instream flow investigations, May-October 1983. Susitna Hydro aquatic studies. Report No. 3, APA document No. 1934. Anchorage: Alaska Department of Fish and Game.

Willette, T. M., and R. D. DeCino. 2023. Eulachon spawning biomass in the Susitna River, 2016. Alaska Department of Fish and Game, Fishery Data Series No. 23-16, Anchorage.

PC13

Submitted by: Corey Berg
Community of Residence: Wasilla, Alaska

Proposal 238

Oppose

Understanding boat hull designs, motor size, and knowing how to operate a boat on the Little Susitna river are big factors that the bank angler with this proposal wouldn't even know where to start. The Hull of a boat can create 80 percent or more of the wake your making. Motor size isn't going to help anything. I am a guide on the river and have ran serval types of boats and what im running puts up way less of a wake then a 16ft john boat with a 40hp.

For erosion problems I'd like to let you all know that the rivers has flooded 2 or more times last season and the after math has changed the river drastically.

In the last 3 season the little Susitna river has hit flood staged waters.

I've flown the river in our super cub during that time and it's an eye opener.

What 1 flood does to the river banks and shoreline would take a lifetime or more for boat wakes to do.

There's not enough traffic on the river anymore to even bring up a motor size restriction. From May 15th - july 15th your lucky to see 5 boaters on the river now days. Are kings are gone and know ones down there.

You have 8-10 days in august when the river gets busy for silver season. Then it fades off.

Well look at last season 2023 silver season got shit down on august 19th.

Im on the river from May till it freezes up.

My 2 cents is that a motor restriction is not going to bring our salmon back. Let's get to the real subject an quit wasting time on useless stuff.

Thanks for your time.

Proposal 238: Oppose

PC14

Submitted by: Russ Bjorn
Community of Residence: Blackfoot, Idaho

Lowering the escapement numbers does not help the King Salmon survive at all, it is wildly concerning that such method would be used, and anyone can see that it will eventually lead to extinction.

Limit commercial fishing, fore they catch numerous amounts more of the fish than the recreationalist.

Proposal 83: Support

February 5, 2024

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

Dear Board of Fisheries,

I commercially fish in Cordova, Alaska, and I support the removal of Proposition 59 and oppose Proposition 43.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

Sincerely,
David Blake
[redacted]@[redacted]
Cordova, Alaska

February 01, 2024

Dear Chairman Wood and Board of Fisheries members:

Moved to alaska 8 years ago and fell in love with the outdoors. Over those 8 years, the king salmon fishing has almost disappeared in multiple fisheries. Its ridiculous putting money ahead of the survival of a resource

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Matt Boldt
Anchorage, AK

February 07, 2024

Dear Chairman Wood and Board of Fisheries members:

I have fished the Kenai River since 1989 with my family. The family has owned property on the river since 1979 and they have fished it long before owning the property. I have seen the King numbers plummet over these years!

I don't know what the right answer is here, but I think the entire fishery for the Kenai Kings should be shut down until the numbers actually show they are returning. Be PROACTIVE and not REACTIVE. The actual number of guides on this river should have been limited years ago and to be actual AK state residents to be a guide for these fish. I am hopeful, but not optimistic the Kings will ever return to the numbers and sizes from the good ol days. I know a complete shut down to fish for kings impacts many who depend on the fisheries for their livelihood, but this is about the KINGS and not about ones pocket book at this moment in time. Do what is right for the fish and not the pocket book. Not a well liked opinion, but you asked for mine and I am happy to share it with you all. Thank you again for your time and good luck with the tough decisions ahead of you! Doing what is right is hard and not what is liked.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

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Sincerely,

Penny Booher
Chugiak, AK

Submitted by: John Bottari
Community of Residence: Houston Ak

Proposal 238

Hp restriction will not help the decline of river bank erosion. Maintained shoreline with zone fenced area will help the foot traffic also possible trail extension access to more avl access for bank anglers

February 5, 2024

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

Dear Board of Fisheries,

I'm a commercial fisherman from Wasilla, Alaska. I started gill netting in PWS in 2006 and hope to continue for several more years. This will be my major source of income.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Robert Bottoms
[redacted]@[redacted]
Wasilla, Alaska

February 5, 2024

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

Dear Board of Fisheries,

I'm part of the subsistence, commercial, and sport fisheries, as well as seafood processing, in Cordova, Alaska.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Bret Bradford
[redacted]@[redacted]
Cordova, Alaska

February 8, 2024

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

Dear Board of Fisheries,

I commercial fish in Sitka, Alaska. My commercial fishing business and livelihood would not be a success without the hatcheries. The majority of the fish that I catch are hatchery produced. Many of the fishing communities rely on those fish for the majority of our income.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Joshua Brandenburg
[redacted]
Sitka, Alaska

February 12, 2024

Dear Chairman Wood and Board of Fisheries members:

I want to thank the Board members for their time and service. My family really enjoys fishing to spend time together and salmon is a healthy part of our diet. I hope we protect the resource for generations to come.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure "window" from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

KEVIN BRANSON
Soldotna, AK

February 5, 2024

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

Dear Board of Fisheries,

I’m part of the subsistence, commercial, sport, and personal use fisheries in Petersburg, Alaska.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Jared Bright
[redacted]@[redacted]
Petersburg, Alaska

Submitted by: Mike Brown
Community of Residence: Anchorage, AK

Proposal 167 - No Bait middle river Skilak Lake to Moose River.

#1 to protect coho stocks which the department has little to no data on.

#2 to protect trophy resident species that are being caught and mishandled as bycatch

The problem is that anglers are fishing coho salmon in staging (prespawn) areas with bait. Due to the lifecycle timing of the coho in these areas many of them have changed color (turned red) and are no longer desirable for harvest. The angers are then forced to catch and release undesired coho in large numbers in order to high grade fresher coho in that area. With the data on high mortality rates of coho in catch and release fisheries, the fishery being currently prosecuted as such is unsustainable and needs to be addressed.

The resident species require equal protection under catch and release fisheries - prosecution of a bait fishery is unsustainable.

Proposal 167: Support

February 09, 2024

Dear Chairman Wood and Board of Fisheries members:

I've lived in Alaska all my life and have fished the Cook Inlet watershed for salmon and trout. Raised by my dad getting out to the rivers from the 1960's, and now I do the same with my children.
An important dialog is who owns the fish? Who has the right to the fish? Should some get more than others?
Do commercial fishing operations have a "right" to future fish catches? No
And sport fishermen should be allowed a greater catch than they have been given and commercial fishermen less.
The Alaska Constitution is all about protecting our natural resources and allowing balanced harvests. But the environment comes first. No harvests or bycatch if its damaging.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Kevin Brownsberger
Anchorage, AK

James R. Burton
F/V Cricket
PO [redacted]
Cordova, Alaska [redacted]

January 30th, 2024

John Wood, Chair
Alaska Board of Fisheries
PO Box 115826
Juneau, AK 99811-5526

RE: Public Comments for LCI Proposals

Dear Mr. Chair and Board of Fisheries Members, I am a third generation Fisherman from Cordova, Alaska. I have fished for herring, salmon, crab and ground fish from Southeast Alaska to the Bering Sea for the majority of my life. I have been a sport and subsistence user for fish and game resources in Alaska for all of my life. I have served as a Fish and Wildlife Aide and an Alaska State Trooper in the Division of Fish and Wildlife Protection with duty stations in Kodiak, Fairbanks, Sitka and Anchorage. I served the community of Cordova, seated for two terms on Cordova City Council in addition to other various roles including the Harbor Commission and Health Services Board.

I am married and the father of four children. My oldest daughter has been fishing with me for 5 years as a full time crewman, and participates in the multiple fisheries. She is an up and coming 4th generation fisherman, recently purchasing her first permit. Commercial Fishing is critical to my family, not only as income, but a skill and tradition to be passed down. The idea that the commercial fishing industry would be willing to sacrifice the future of our fisheries for a fish ticket today couldn't be further from the truth. We are not only fishermen, but stewards of the resource with the goal to pass this industry down to the next generation. I have every intention to introduce the rest of my children to this life in hopes that they will someday have an opportunity to feed the world.

I urge you to reject Proposal 43 and all similarly worded proposals and offer the following personal comments -

Proposal 43 essentially states that in 2000, an agreement was made to reduce hatchery egg takes for pink salmon to 25% of the year 2000 numbers.

For starters, the language of the proposal is flawed from the get go. The proposal states: ***Reduce hatchery production to 25% of the year 2000 production as promised in 2000.***

Later, the language in the proposal states: ***The hatchery management met with the Governor and proffered that if the Board would not take up the proposal they would reduce their production by 25%.***

Which is it? Reduce Hatchery production in Alaska to 25% of the year 2000 egg take numbers, or reduce the 2000 egg take numbers by 25%. That's a MASSIVE difference.

Further, even if the Board of Fisheries has the authority to alter or regulate egg take numbers, it circumvents a larger process by which these numbers are arrived at - utilizing the best available science. This proposal suggests that the Board, and every stakeholder in the industry, simply agree to this reduction that is the result of an advisory committee proposal in a community with 32 residents (in the year 2000). Essentially 0.005 percent of the Alaska population of 627,963 at the time. Not that every Alaskan doesn't matter, they most certainly do, but I would suggest that the 2000 proposal was not indicative of the general wishes of Alaska - and it is most certainly outdated 23 years later. You, and WE should not be beholden to this argument generations of Alaskans later.

Having said that, proposal 43 suggests that hatchery-produced salmon compete with wild salmon for food and that as a result, ocean productivity is low. If this is true, I ask how have we seen - in the last ten years - some of the largest sockeye and pink salmon returns (sometimes simultaneously) in Alaska? How do we explain the last handful of record-breaking Bristol Bay returns that occurred at the same time that North Pacific aquaculture productions were at their current and probably record levels if you consider Russia and Asian hatchery production? Perhaps Bristol Bay sees record sockeye returns because they don't have sport fishermen stomping in and around their spawning grounds to the extent that the Chitina, Copper, Mat-Su and Kenai region do?

Continuing that thought, Russia produces pink salmon at a rate that is greater than 2:1 for Alaska. It's unclear what the split is between wild production and hatchery, but the information I have suggests it's at least 50% hatchery production. What number of eggs that takes and how many fry are released into the North Pacific Ocean I don't think we'll ever know. Which brings me to my next question for the Board:

If we accept that proposal 43 is completely factual, and we accept the correlation = causation argument regarding hatchery vs. wild salmon, food supply, etc… then: Why is the onus placed on Alaska hatcheries to bear the entire burden of the North Pacific? Salmon fry release into the ocean is in the ***billions*** yet this proposal takes zero consideration into the fact that this is a multinational industry, of which the State of Alaska is honestly ***at least*** a very distant second - to other countries over which the BOF has no control or jurisdiction.

Those arguments aside, I do not see any evidence presented in Proposal 43 to effectively quantify what benefit wild salmon would see, given a significant reduction in hatchery salmon. The lack of quantifiable, defensible data is arguably the biggest concern with this proposal. Rather than rooted in science, it essentially says the BOF needs to modify hatchery salmon production because "a long time ago those guys said they would and they didn't." As a parent, the argument feels a lot like one I'd hear from my preschooler and not something I would use to

determine the economic fallout of such a decision on the entire State of Alaska and its fishing industry.

Thank you for your time and dedication to this process.

Sincerely,

James R. Burton

PC27

Submitted by: Dusty Byrd
Community of Residence: Cooper Landing Alaska

I support proposal 167 to protect coho and resident species.

Proposal 167: Support

PC28

Submitted by: Bari Cabana
Community of Residence: Girdwood

No on 43 and please look into the absolute lack of hatchery fish effecting wildstocks. The facts are just not there and every single board meeting the same people put out the same proposals to do away with hatcheries for no reason. It is a waste of everyones time and energies and there are much more important issues to address...thank you

Proposal 43: Oppose

PC29

Submitted by: Jeremy Cabana
Community of Residence: Homer, Ak

Hello good people of the board of fish.

No on 43

My name is Jeremy Cabana and I've been I've been involved with commercial fishing since 1985. On my father's boat since I was 5. I was at one time the youngest permit holder in the state at 12 as my father took me to court with him to get the law about permit holders changed to allow you to put a permit in your child's name as long as they were an integral part of your fishing operation. Needless to say running a skiff from the age of 12 till 29 was good introduction to how my life was going to proceed.

Folks, I am writing to you today to defend my job and my lifestyle and heck the way of life that I'm the third generation of and I'm currently raising the fourth generation of. This proposal is absolutely ridiculous considering how much commercial salmon fishing brings in to not only the state in the form of taxes and revenue from licensing and permits but also the freedom that a terrific job offers. We also have the thousands of families that are using their salmon income to get goods and services in every single town in the state. I'm honestly getting tired of this special interest dark money groups coming in and trying to upend my way of life. I'm a provider, I'm a tax payer, I'm a noble human being who is fighting against the might ocean to make sure that the normal humans who dwell on land and can't comprehend the sacrifices and suffering that we go through to provide this country with some of the best seafood in the world and I've got to worry on top of this incredible weight of the dangers I face every day on the sea that some pencil neck city slicker who couldn't last a week doing our jobs has the audacity to propose that maybe we don't have as much seafood for the country and that the price of fish will be unattainable for most Americans. Now I'm just wondering what these people actually produce that is helpful to this great country. They can write stuff but most people can do that, so far they are worthless and not worth listening to. Are they capable of feeding millions of people with a delicious and sustainable seafood that is so good for you that it will literally extend your life???

No they are not. As far as I can tell they are completely worthless if we are judging them on their actions pertaining to national security and national sovereignty. I create food for Americans. We are as valuable as the

farmers who also produce food and security for our nation. The fact that you are considering the idea of less fish is incomprehensible especially given the current global threats to our country and looking at how the situation in Ukraine has affected the wheat harvest and distribution. Whenever you listen to people who don't add to the greatness of this state or country it makes us weaker and the idea that we should lower our ability to enhance our natural runs is ridiculous. I mean it's comical to think that we can control the natural ability of salmon and their ability to make more of themselves. Heck just last year we were hearing that salmon were making the way up into the Arctic Ocean. It's similar to the natural migration that occurred long before the science behind it was well known. The salmon has spawned further and further up the west coast in a natural progression and they will do that until the bitter end. I simply cannot comprehend the stupidity that would bring someone to believe that the additional salmon that are being produced are harmful in a way that would mandate the reduction of their numbers. They obviously don't have any connection whatsoever with the ocean and it's mysterious ways. I've spent 38 summers of my life on the water of lower Cook Inlet and prince William sound. I have seen things that have changed me. I have harvested 10's of millions of pounds of salmon. I have paid hundreds of thousands of dollars in taxes. I'm the ideal human just from a productivity standpoint and yet some chuckle head thinks that they know better than the people who are actually doing the work. They are worthless and don't deserve to be heard, certainly not by the board of fish. Tens of thousands of Alaskans benefit because of the enhanced runs of salmon not to mention the tens of thousands of people who come from around the world to visit us. Those Alaskans who have built their lives around harvesting salmon are a tough group. We don't have enough money to spend on people advocating for us and it's problematic because we don't want a lot of attention. We want to kill fish and make some money. That's it. That's what drives us. I'm sure the people who hate salmon and the good stuff that comes with it are sad, hateful people who don't get to have a job they love. They are angry bitter people who want to see the entire country suffer because they don't know a single thing about the mighty Pacific Ocean. They clearly hate America. That's the only reason I can wrap my head around. Why else would you want to have less salmon in your diet and the ocean? Because you hate American food and Americans having access to fresh seafood without preservatives and food coloring and chemicals like farmed salmon.

I'm sick thinking that people want to destroy our way of life. We've been doing this for decades and now all of a sudden we're ruining this snowflakes false claims about the ocean. The ocean is fine, the salmon are fine. The asshole who wrote this proposal is not fine. I'd imagine some sort of mental health issue or possibly a stroke that destroyed their ability for critical thought. No reason why we don't need more fish. That's the real proposal that we need. Double production of the enhanced salmon runs. I am still waiting for someone to come help us after the Russians destroyed the salmon market this last August. The fishing industry was hit hard by the slashing of the salmon prices. Devastating for the state and local economies. Devastating for the thousands of people who depend on the income.

So sorry for rambling, I kill fish for a living and take great pride in my job and the value that it brings to my country. I'm deeply offended that someone would want to destroy my way of life and my ability to provide for my family. I've worked hard my entire life, Literally and to think that some buttery soft handed man would have the audacity to tell me, a man with rough hands to work less and make less is beyond my comprehension. I thought this was America.

I imagine that they speak like this. "Hey you, hard working real man or woman who battles the ocean to provide great food for this country and pay more in taxes than I make. please don't mind me ruining your way of life. I have no real life skill beyond being a professional worthless idiot. I don't understand how the ocean works or how every single year the fish return in a cycle as old as time. I don't love this country and I love the enemies of America, like Russia and North Korea. I hate when hardworking Americans provide delicious, affordable, nutritious food for their countrymen."

I have no respect for anyone who tries to take away my ability to provide for my family and my country. This is a noble duty that often results in death and disability and I don't need any bullshit from some vitamin deficient, mouth breathing, anemic, low levels of iron and calcium lame ass fake American. Honestly, this is treasonous

behavior. Trying to destroy our ability to produce something that is incredibly important and valuable for the country is borderline criminal behavior and certainly treasonous. I'm just asking that maybe we should look into their background and financial situation. Probably some payments from the kremlin in there. Why else would this even be considered other than to hurt American people and their families. We boast some of the last natural runs of salmon in the world and I'm incredibly proud of be a part of it. If we didn't have the enhanced runs of salmon I'm completely sure we'd have no runs that would still be harvestable at this time. I've fished lower Cook Inlet and I know what it's like to need those runs to be strong every year. Didn't take long before we had to add fishing in the sound to survive. Beyond the Bristol bay run we have enhanced runs around the state that provide not only the people who harvest the fish for a living but also those who DON'T actually pay for the enhanced fish that are created. As far as I know not one dollar from the sport fishing actually pays for any hatchery fish. Maybe anchorage but I'm not sure. Regardless we (commercial fishermen) are such an important part of the Alaskan economy that it's completely ridiculous that we are considering that lowering production to the level that we had 25 years ago. We need to make more. More fish means more jobs, more jobs means more money for families.The best thing to do is disregard this nonsense proposal and do what is best for America.

Thank you for listening to my opinion.

Sincerely Jeremy Cabana

Proposal 43: Oppose Proposal 144: Support Proposal 145: Support

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February 8, 2024

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

Dear Board of Fisheries,

I live in Girdwood, Alaska, and I'm a part of the subsistence, commercial, and sport fisheries in Whittier, Alaska. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Russell Cabana
[redacted]
Girdwood/Whittier, Alaska

PC31

Submitted by: Tim Cabana
Community of Residence: Girdwood alaska

This is for those proposals to regulate hatcheries statewide. I have fished for 50 years and seen before hatcheries and after and cannot think of a single run of wildstock fish that has been negitively affect by hatcheries. Please look at the real fact and disregard the end of the world drama the anti hatchery crowd bring to the table. It is simple wrong. All natual runs in hatchery areas are as stong as ever. In prince william sound where hatcheries have been for decades we just had the largest wildstock run in history just a few years ago.

PC32

Submitted by: Debra Call
Community of Residence: Anchorage, Alaska

Proposal 217 - I support this proposal because smelt feeds the endangered species - Beluga Whale and smelt feeds the endangered Alaska wild King Salmon

Per NOAA - Management Overview. All beluga whales are protected under the Marine Mammal Protection Act, with the Sakhalin Bay-Nikolaya Bay-Amur River stock and the Cook Inlet stock designated as depleted. The Cook Inlet beluga whale population is listed as endangered under the Endangered Species Act.

Per the Wild Fish Conservancy's 68-page petition. (1/11/24) says that the king salmon, also known as chinook, are threatened by climate change and competition from hatchery-raised fish, and that existing state and federal management are failing to stem their decline.

Over 211 TONS of SMELT were commercially taken from the feeding area at the Susitna River. A study needs to be done to ascertain healthy numbers of smelt to sustainably feed the endangered king salmon and endangered beluga whale disappear from Cook Inlet.

The 7 smelt harvesters do not take priority over the need to save our Cook Inlet endangered king salmon and endangered beluga whale. There needs to be a priority to pause to study the smelt numbers and ensure a healthy population is maintaioned.

Proposal 131: Support Proposal 142: Support Proposal 217: Support

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February 5, 2024

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

Dear Board of Fisheries,

I'm part of the subsistence, commercial, and sport fisheries in Sitka, and I'm a salmon hatchery employee.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Casey Campbell
[redacted]@[redacted]
Sitka, Alaska

Submitted by: Ron Carmon
Community of Residence: Ik enai

All1245678 proposals.

Notice , have you ever noticed.

The cookinlet fish !

Has been givened to the wo r ld for sport fishing.

And now " guides equal oppertunities.

After 30 years, guides fish this cookinlet fish resourse for free.

Guides net income, 100 grand a year.

Cities of kenai nets 30 million a year

Dip net fisheries, 540 million dollars of fish. At 12.99 lb.

And allways, allways adfg comes after

The commerical fishery.

Commerical paid there way,

So many years now.

Commerical fishing has skin the game.

Guides are funded, by the 20000 box stores.

No skin in the game.

And not even a fishing license.

And the adfg goes to, bof every day .

To rewrite, laws, ro change wording.

To invent new stragities.

To make bof rules changes .

Then just before, fishing starts.

There this new bof meeting.

That the enforcement adfg .

That says we all have ro make sure.

That every body has equal chances to fish.

Except!

The cookinlet fisherman.

Here we fo again .

Adfg [redacted] has to make sure.

Guides that fish for free, without a license.

In anchorage or the world.

Is asking the board of fish, to cut the cookinlet fishery.

Even more.

Board of fish.

Lets go back to 1901 rules for cookinlet.

1 mile from the mouth too a 120 miles south.

On the streams in cookinlet.

Adfg currently working , on givingthe spoils

Of left over fish to the kodiak seine fishery.

So go back to the 1901 rules.

Look, what you reduced the commerical fishery too.

Eez zone.

You kidden me!

6.4 million guides, at 1760 for a license.

Wavied for 30 years.

By adfg.

Every year, loss of profit.

What does it take.

Not to be dumb.

Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose

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February 8, 2024

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

Dear Board of Fisheries,

I am a long time commercial fisherman and subsistence user on the Copper River Flats and the Prince William Sound. I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

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We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Douglas Carroll
[redacted]
Cordova, Alaska

PC36

Submitted by: Heath Carroll
Community of Residence: Cooper Landing

Proposal 167 - protect coho stocks and protect trophy resident species

Proposal 167: Support

PC37

Submitted by: Brad Carver
Community of Residence: Soldotna, AK

Please consider supporting proposal 83 in some form. It offers significant protection, especially to hens, for Kenai River King salmon. This proposal is probably 20 years too late , but that doesn't mean that we can't try to do what we can to offer protection to what we have left. More eggs in the gravel would be a good start, and that is what this proposal would provide.

Sincerely Brad Carver. Biologist, former ADFG employee, former Kenai River guide, former vice chairman Kenai Area Fishermans Coalition, and 35 plus year year private Kenai River fisherman.

Proposal 83: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I have lived in Alaska now for almost 15 years. I have fished all over the state and fish primarily to feed my family. I do fish for regular enjoyment as well since Alaska has some of the most pristine waters on the earth. It is unfortunate that the fishery management plan is NOT aligned to conservation. Its pretty clear that king escapement is a low priority to the board since the commercial fleet is allowed to stay open and in river EO's are tailored in an effort to keep the fleet fishing. I have NEVER had the opportunity to harvest a king salmon from the Kenai river since abundance has been so poor the entire time I've lived here. I can't recall of a single season where some limitation was not put in place on sport fishers that was just strict enough to let the commercial fleet continue to fish. I hope you do better in the future.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

Chris Chartier
Ft greely, AK

Submitted by: David Childers
Community of Residence: Sterling, AK

I am concerned about the effects of the brine solution sprayed on the roads leeching into the waters and impacting the salmon stocks.

Chugach
ALASKA CORPORATION

February 12, 2024

Members of the Board of Fisheries,

Chugach Alaska Corporation (CAC) is one of twelve land-based Alaska Native Regional Corporations formed under the Alaska Native Claims Settlement Act of 1971 (ANCSA), 43 U.S.C. 1601. The Indian Self- Determination and Education Assistance Act of 1975 (ISDEAA), includes ANCSA Corporation in definition of the "the recognized governing body of an Indian tribe". Today, Congress regularly utilizes the ISDEAA definition of tribe to use ANCSA Corporations as a conduit for Tribal funding and programs in Alaska and in service of Alaska Native people. This action is entirely consistent with that quasi-governmental role of ANCSA Corporations. Alaska's unique model of indigenous self-determination involves Alaska Native tribes, ANCSA Corporations, and other Native organizations, that work together to serve, represent and advance the interests of Alaska Native people, including providing land stewardship, critical services, and benefits to Alaska Native people.

CAC was incorporated on June 23, 1972, and is owned by a diverse group of 2,900+ shareholders. CAC's regional boundaries spans nearly 5,000 miles of Alaska's coastline in the lower Cook Inlet and the Prince William Sound. Under ANCSA, CAC was granted 928,000 acres; this included 550,000 acres of subsurface and 378,000 acres of full fee estate. Within CAC's regional boundary are villages and communities recognized under ANCSA. The communities of Seward, Whittier, and Valdez are located within the CAC region. There are five recognized tribal villages in the CAC region: Chenega, Eyak (Cordova), Nanwalek (English Bay), Port Graham, and Tatitlek. CAC prioritizes the use of its land by shareholders and descendants for cultural, subsistence, recreational and economic activities. CAC may also provide access opportunities to the general public.

We write to you on behalf of Chugach Alaska Corporation to express our strong opposition to Proposal 43, and would like to outline the compelling reasons why we believe it is critical to stand against this proposal.

Hatchery programs have been a cornerstone of Alaska's fisheries for nearly five decades, playing a vital role in supporting our communities, economies, and the sustainability of our salmon runs. These programs provide jobs, income, and economic output in coastal communities, contributing significantly to local economies. Additionally, they benefit many user groups, including subsistence, personal use, sport, and commercial fishermen, ensuring salmon accessibility and abundance for everyone.

Moreover, hatcheries are crucial in reducing pressure on wild salmon stocks, especially during years of lower abundance, thereby safeguarding wild salmon runs. The responsible management of Alaska's salmon hatchery program is highly regulated and grounded in science,

Chugach
ALASKA CORPORATION

with rigorous oversight ensuring sustainable practices. Furthermore, our salmon fisheries, including hatchery-origin salmon, are consistently certified as sustainable, underscoring the responsible management of our fisheries, including hatchery contributions.

Proposal 43 seeks to significantly reduce pink salmon production, posing a threat to the balance achieved in our fisheries. A reduction of this magnitude would have far-reaching consequences on our communities, economies, and wild stocks. Instead of drastic reductions, we urge collaborative efforts between the hatchery community, the Alaska Department of Fish and Game, and industry leaders to ensure the sustainability of our salmon fisheries while addressing concerns.

In conclusion, Alaska's salmon hatchery program is a testament to responsible resource management and sustainable salmon harvests that benefit all Alaskans. Rejecting Proposal 43 and pursuing collaborative solutions will help ensure the continued prosperity of our salmon fisheries and the communities they support.

Thank you for considering our position on this matter. We look forward to working together to preserve Alaska's rich fisheries legacy.

Sincerely,

Josie Hickel, President
Chugach Alaska Corporation

CHUGACH REGIONAL RESOURCES COMMISSION

Aluutiiq Pride

Feb 12, 2024

Dear Board Members of the Board of Fisheries:

I am writing on behalf of Chugach Regional Resources Commission to oppose Proposal 43. The mission of our organization is to protect, preserve, and conserve the environment and natural resources of the seven Tribes we serve. We represent the Tribal Members of Chenega, Cordova, Nanwalek, Port Graham, Seward, Tatitlek, and Valdez. Many of our Tribal Members rely on the subsistence harvest of hatchery salmon to sustain cultural traditions and well-being. Therefore, we oppose Proposal 43 because there are many unknown consequences to our communities and their abilities to maintain enough subsistence harvest of salmon with the proposed reduction of hatchery pink salmon releases. In many of our communities, current subsistence salmon harvest levels are not as abundant as they were in the past, and any less salmon returning to our communities would be detrimental to the food security of our Tribal Members. Thus, we do not think it is a sound idea to reduce the release of hatchery pink salmon by 25%. The precedent Proposal 43 would set for other areas in Alaska causes major pause for concern as to how this proposal will have effects on fisheries across the state.

Proposal 43's proposed reduction in pink salmon production threatens to disrupt the delicate balance of our fisheries, placing the livelihoods and cultural heritage of Indigenous communities at risk. CRRC advocates for collaborative solutions with Tribes that prioritize the preservation of subsistence fisheries through scientific research that assesses the impacts of hatchery-wild introgression and abundance of hatchery pink salmon on the marine ecosystem. We need more significant evidence of the impacts of hatchery pink salmon on the marine food web and wild stocks of salmon before implementing a drastic reduction of hatchery pink salmon production.

In conclusion, our Tribal Members are reliant on the salmon that have become available for our communities from the important hatchery production of CIAA and PWSAC and their continued partnership with CRRC. We oppose Proposal 43.

Sincerely,

Best Regards,

Madeline Lee, MS
Tribal Fish Biologist
[redacted]

Submitted by: Michael Chulick
Anglers Haven Lodge LLC

Community of Residence: Kasilof, AK

See Attached. I would also like to add that I fully oppose any attempts to "save" the Kenai late run kings at the expense of the Kasilof. These rivers need to be paired as there is inadequate protection for the kings in the Kasilof from commercial interests when they are placated by allowing commercial harvest in the Kasilof districts when Kenai is restricted. Please don't damage one system while trying to fix another. For example, Prop 119 if implemented would destroy the Kasilof king fishery and negatively impact the quality of the sockeye fishery.

Proposal 1: Support With Amendments Proposal 2: Support Proposal 3: Support
Proposal 4: Support Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose
Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose
Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose
Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose
Proposal 90: Support With Amendments Proposal 91: Oppose Proposal 92: Oppose
Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Support
Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose
Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose
Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Support Proposal 108: Oppose
Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Support
Proposal 113: Oppose Proposal 141: Support Proposal 146: Support Proposal 150: Support
Proposal 153: Support Proposal 172: Support Proposal 175: Support Proposal 184: Support
Proposal 190: Support Proposal 191: Support Proposal 193: Support Proposal 199: Support
Proposal 200: Support Proposal 202: Support

February 06, 2024

Dear Chairman Wood and Board of Fisheries members:

I own and operate a fishing lodge on the Kasilof River. Our guides take guests fishing on the major rivers (Kenai and Kasilof) and the smaller rivers along the peninsula. Our livelihood is largely dependent on healthy stocks of all species of salmon, steelhead, and trout. The reduction of opportunity for king salmon fishing has hurt our lodge in multiple ways to include reduced bookings in May, June, and early July and increased pressure on the Kasilof reducing the quality of the experience for those who do choose to come here. We are also concerned about the Coho population as there has not been a significant study in recent years on prevalence of this key species. Lastly, the frequency and spacing of commercial openings for sockeye has a very negative impact on the Kasilof when left open too long or multiple days in a row essentially wiping out opportunity for recreational anglers that may only be here for a few days or a week.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye. I am also concerned about proposals that would move the commercial fishery openings later in the year to allow sockeye fishing when coho are returning. I support a late run Chinook management plan for the Kasilof river coupled with population studies.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest. While not shown as a current proposal, I do not understand why the Kasilof doesn't have similar protections as the Kenai regarding the distance commercial operations need to be away from the shore and mouth of the river. When the Kasilof zones are open for commercial operations, virtually no sockeye and therefore no kings make it into the river. This time period is when the big wild fish run in the Kasilof rather than the Crooked Creek hatchery stock.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents and our guests to harvest sockeye salmon. This is why I support Proposal 90 with modification. Rather than a single 48 hour closed window, I would modify this to having 36 hours of openings on Sunday nights, Tuesdays, and Thursdays. This would allow a continued commercial harvest with minimal impact on recreational anglers.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals. I would also support expanding this proposal to the Kasilof if data is available to support this decision.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

I would also like to state that allowing excessive commercial harvest does not help the commercial fishermen as evidenced by 2023 sockeye price per pound. Limiting the commercial harvest actually ensures a better, sustainable living for commercial fishermen as the price will rise with limited supply. Conservation can be equally or more profitable if done correctly.

Sincerely,

Michael Chulick
Kasilof, AK

January 30, 2024

Dear Chairman Wood and Board of Fisheries members:

I'm a 23 year Military Retiree that retired in this great State. My wife and I fish for the relaxation and the Alaska adventure. We fish all over the Kenai Pennisula and Mat Su Valley area. Due to their declining numbers, we have not retained a Chinook Salmon since 2002 and mainly Trout and Sockeye fish.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

SHAUN CHURILLA
Eagle River, AK

Submitted by: Russell Clark
Community of Residence: Kenai, Alaska

Proposal 96-Flagged nets. I support this proposal as I fish flagged nets on the first sites North of the Kenai River starting at about 3/4 mile off of the beach. I fish 6 nets flagged in order to keep my nets from sinking in the strong tides. I have NEVER caught a king in my flagged nets. I also do not catch flounder as other traditional set nets do.

Flagged Nets is the ONLY way to fish for sockeye that will NOT catch Kings. The nets fish full depth the whole net length without creating a bag which Kings can be caught in when the tide reduces the distance between the cork line and lead line on traditional set nets.

Flagged nets do not catch as many sockeye as traditional set nets and that in itself is proof that Kings will not be caught in flagged nets.

I do not understand the BOF's reluctance to consider this method of fishing as a viable tool to keep setnetters fishing when otherwise closed. Many setnetters have fished flagged nets when one of their anchors is lost and the net flags.

I have video of fishing flagged nets successfully and implore the BOF to consider this proposal.

Proposal 75: Support	Proposal 76: Support	Proposal 77: Support	Proposal 78: Support
Proposal 79: Support	Proposal 80: Support	Proposal 81: Support	Proposal 82: Support
Proposal 83: Oppose	Proposal 84: Support	Proposal 85: Support	Proposal 86: Support
Proposal 87: Support	Proposal 88: Oppose	Proposal 89: Support	Proposal 90: Oppose
Proposal 91: Support	Proposal 92: Support	Proposal 93: Support	Proposal 94: Support
Proposal 95: Oppose	Proposal 96: Support	Proposal 97: Support	Proposal 98: Support
Proposal 99: Support	Proposal 100: Support	Proposal 101: Oppose	Proposal 103: Support
Proposal 104: Support	Proposal 105: Support	Proposal 106: Oppose	Proposal 107: Support
Proposal 108: Support	Proposal 109: Support	Proposal 110: Oppose	Proposal 111: Oppose
Proposal 112: Oppose	Proposal 113: Support	Proposal 114: Support	Proposal 115: Oppose
Proposal 116: Support	Proposal 117: Support	Proposal 118: Support	Proposal 119: Support
Proposal 120: Support	Proposal 121: Support	Proposal 122: Support	Proposal 123: Support
Proposal 124: Support	Proposal 128: Support	Proposal 129: Support	Proposal 130: Support
Proposal 131: Support	Proposal 132: Support	Proposal 133: Support	Proposal 134: Support
Proposal 135: Oppose	Proposal 136: Support	Proposal 137: Oppose	Proposal 138: Oppose
Proposal 139: Oppose	Proposal 140: Oppose	Proposal 141: Oppose	Proposal 142: Support
Proposal 143: Oppose	Proposal 144: Support	Proposal 145: Support	Proposal 146: Support
Proposal 147: Support	Proposal 148: Support	Proposal 149: Oppose	Proposal 150: Oppose
Proposal 152: Support	Proposal 153: Oppose	Proposal 154: Oppose	Proposal 155: Oppose
Proposal 156: Oppose	Proposal 157: Oppose	Proposal 158: Oppose	Proposal 159: Oppose
Proposal 160: Support	Proposal 161: Support	Proposal 162: Oppose	Proposal 163: Support
Proposal 164: Support	Proposal 165: Oppose	Proposal 166: Support	Proposal 167: Oppose
Proposal 168: Oppose	Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose
Proposal 173: Support	Proposal 174: Oppose	Proposal 178: Support	Proposal 205: Oppose
Proposal 206: Oppose	Proposal 207: Oppose	Proposal 208: Oppose	Proposal 209: Oppose
Proposal 210: Oppose	Proposal 211: Support	Proposal 212: Oppose	Proposal 213: Oppose
Proposal 214: Oppose	Proposal 215: Support		

Submitted by: Russell Clark
Community of Residence: Kenai, Alaska

Proposal 205 should not be considered as it proposes to permanently close a traditional fishery. This request does not consider subdistrict participation in the Northern District and each subdistrict harvests different salmon stocks. This proposal is also allocative. Emergency order management has greater flexibility to manage each subdistrict.

Proposal 206 should not be considered in its current form as again, it does not address management of commercial fishing in the Northern District on the subdistrict level. A blanket proposal that covers the whole Northern District does not allow proper management for the stocks of concern in areas that do not even contribute fish to some areas. If a cap was to be placed on the King Salmon harvest, each subdistrict should have its own cap.

Proposal 207 should not be considered as it gives false information and does not present facts. The Northern District is not currently dominating the harvest of King Salmon. Currently the Northern District is lucky to get 18 hours of fishing during the whole Northern District King openers. Often the openings occur when the tide is out and fishermen have no water on their nets. This proposal also gives suppositions of the authors belief on King mortality from catch and release and rollouts of nets. Not documented data. This proposal also promotes the consistency of the commercial King harvest when there has been no such thing as the commercial King season was closed for many years in the Northern District.

Proposal 210 should not be considered because again, it is addressing the Northern District as a whole instead of as subdistricts. To close a whole district or restrict the whole district based upon one weir location when in many parts of the Northern District, fish harvested in some subdistricts do not even go to those weirs. Emergency orders that are currently in use address these issues and should not be changed. Also there are already regulations in place that limit fishing within certain distances from androminus streams where salmon go to spawn. These setbacks are already in place for these streams.

Proposal 212 should not be considered and further net restrictions should not be put into place as the Northern District is already and has been the most restricted District in nets and fishing time until the past few years when early closures hit the Central District:. Any more restrictions to the Northern District will make it an allocative fishery catering to the sports fishery. Limiting permit holders to one net per permit does not allow commercial fishermen to pay their crew and expenses which over 90 percent of Northern District fishermen are Alaskans. If the CFEC does a feasibility study and deems that there should be gear reductions then there should be a gear reduction program and compensation per permit as is being considered in the state legislature for the ESSN fishery.

Proposal 213 should not be considered as it further restricts a traditional fishery in favor of a dipnet fishery that has recently been started. I am sure that the intention of the BOF was not to create a new fishery and user group to replace a traditional fishery. There is not any biological data to support this proposal and this proposal also limits the whole Northern District when many subdistricts do not even harvest salmon bound for the new dipnet fishery. There is already measures in place to regulate commercial fishing in the Northern District that can address each subdistrict.

February 5, 2024

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

Dear Board of Fisheries,

I commercial fish in Ketchikan. I have been commercial salmon fishing every year since 1976 in southeast Alaska. Before hatcheries it was getting very hard to make a living and raise a family. Since our hatchery program has been producing fish, it has given us a chance to make a living and at the same time reduced the pressure on our wild stocks. If the hatcheries were to go away, the chaos would affect banks, grocers, fish stocks, and ultimately the entire economy of Alaska in a very negative way. I would be very careful engaging in this rabbit hole.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries

and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.

Opposition to Proposal 43:

We continue to oppose Proposal 43, for the following key reasons.

(1) Lack of Scientific Evidence: Proposal 43 lacks substantial scientific evidence to support claims that hatchery fish have a detrimental impact on wild salmon populations or ecosystems. Decades of research and data show that hatcheries and wild salmon can coexist and even thrive together.
(2) Steady Increase in Wild Salmon Returns: Contrary to the proposal's assertions, regions with hatcheries in Alaska have witnessed steadily increasing wild salmon returns since the early 1970s when these programs were established. Hatcheries have not replaced wild salmon but have provided a stable supply for commercial, sport, and subsistence fisheries, while at the same time wild stock escapements are being met.
(3) Social and Economic Benefits: Hatchery programs have been instrumental in meeting the demand for salmon while preserving wild stocks and their habitats. They support the livelihoods of Alaskans, contribute to local economies, and provide a buffer against the variability of wild salmon runs.

As an Alaskan and supporter of responsible resource stewardship for future generations, I thank the Board for this opportunity to advocate for sustainable fisheries management practices and the long term, science-based decision making when it comes to hatchery resources.

Sincerely,
Russell Cockrum
[redacted]
Ketchikan, Alaska

Submitted by: Mark Cohen
Community of Residence: anchorage alaska

proposal 167 no bait middle river (skilak to moose)

I have been fishing the Kenai River since 1985 and purchased property in the middle river in 2009. In the last few years, we have noticed a significant change in silver salmon fishing. My personal observations are as follows.

1. Fishermen are targeting the spawning beds where fish school up, prep for spawning. I have observed guides and private anglers alike catching and mishandling and then releasing salmon that are not fresh enough for their liking. At times releasing as many as 10 fish to keep one. I have no idea what the mortality rate for this behavior is, but I would assume it is high.

2. The methods are changing also, boats are not anchoring or back trolling in sections of water where fresh fish are migrating through but anchoring in resting area's and targeting them with eggs and bobbers which cover hundreds of yards of river and thus keeping other fishermen from fishing waters they normally would for other species (trout and dollies). This method is particularly hard on the resident by catch (trophy trout) that are dialed in on the bait being used by the salmon anglers. I have witnessed many times, anglers both guides and private, yank a large hook out of a large trout's throat put their fingers in the gills and take a photo and then toss a bleeding trout into the river.

3. I also think that the river could go to single barbless hook which would make releasing fish much safer for the fish.

In my opinion this practice is not sustainable for salmon or trout.

For the record, I was for many years, a salmon egg fisherman for silvers, however after hooking way too many trout while salmon fishing, I have changed my methods. We have had just as much success without bait for salmon and greatly reduced hooking rainbows. I believe something must change soon to keep what happened to the kings from happening to the silvers and resident species.

Proposal 167: Support

Submitted by: William Cohen
Community of Residence: Soldotna, AK

Please do whatever you can to preserve the large Kenai Kings and Rainbow trout.

There should be no bait allowed year round above the Upper Kiley River and the rest of the river should be closed to bait until August 15 to October 31. Also the whole river should be single hook only year round, no multiple hooks ever. Fishing from an anchored vessels should be prohibited year round above the Upper Kiley River.

Guides during Sockeye season should be restricted to fishing from 5AM to 8PM and should be required to stay with their clients. No drop offs allowed.

From the mouth of Skilak Lake down any Sockeye no matter where hooked that is removed from the water must be kept and counted as part of the possession limit.

Also the seals are a problem. There are more and more in there middle river every year. They take many trout and salmon and harass them while spawning.

Proposal 75: Oppose	Proposal 76: Oppose	Proposal 77: Oppose	Proposal 78: Oppose
Proposal 79: Oppose	Proposal 80: Oppose	Proposal 81: Oppose	Proposal 82: Oppose
Proposal 84: Oppose	Proposal 85: Oppose	Proposal 86: Oppose	Proposal 87: Oppose
Proposal 88: Oppose	Proposal 89: Oppose	Proposal 90: Support	Proposal 91: Oppose
Proposal 92: Oppose	Proposal 93: Oppose	Proposal 94: Oppose	Proposal 95: Oppose
Proposal 96: Oppose	Proposal 97: Oppose	Proposal 98: Oppose	Proposal 99: Oppose
Proposal 100: Oppose	Proposal 101: Support	Proposal 102: Oppose	Proposal 103: Oppose
Proposal 104: Oppose	Proposal 105: Oppose	Proposal 106: Support	Proposal 107: Support
Proposal 108: Oppose	Proposal 109: Oppose	Proposal 110: Oppose	Proposal 111: Oppose
Proposal 112: Support	Proposal 113: Oppose	Proposal 114: Oppose	Proposal 115: Oppose
Proposal 146: Support	Proposal 147: Support	Proposal 148: Support	Proposal 149: Oppose
Proposal 150: Support	Proposal 151: Oppose	Proposal 152: Oppose	Proposal 153: Oppose
Proposal 154: Oppose	Proposal 155: Oppose	Proposal 156: Oppose	Proposal 157: Oppose
Proposal 158: Oppose	Proposal 159: Oppose	Proposal 160: Support	Proposal 161: Support
Proposal 162: Oppose	Proposal 163: Support	Proposal 164: Support	Proposal 165: Oppose
Proposal 166: Support	Proposal 167: Oppose	Proposal 168: Oppose	Proposal 169: Support
Proposal 170: Oppose	Proposal 171: Oppose	Proposal 172: Oppose	Proposal 173: Support
Proposal 174: Oppose	Proposal 175: Support	Proposal 176: Support	Proposal 177: Support
Proposal 178: Oppose	Proposal 179: Support	Proposal 180: Support	Proposal 181: Support
Proposal 182: Oppose	Proposal 183: Oppose	Proposal 188: Support	Proposal 189: Support
Proposal 190: Support	Proposal 193: Support	Proposal 194: Oppose	Proposal 195: Support
Proposal 196: Support	Proposal 197: Support	Proposal 200: Support	

January 31, 2024

Dear Chairman Wood and Board of Fisheries members:

I was born and raised Alaska and have fished on the Kenai River since my youth. Since my retirement in 2016 I have lived year round on the Kenai River. I fish for pleasure and food. I own 3 boats and take family and friends out all summer on the Kenai River.

Large escapements over the last 20 years continue to produce average to large returns of sockeye in the Kenai and Kasilof rivers. More fish in our rivers means more opportunity in sport and personal-use fisheries and likely greater numbers for future years. This is why I support Proposal 112 to increase the Kenai sockeye inriver goals.

Large commercial sockeye harvests come at the expense of other species and stocks in Cook Inlet. The Inlet must be managed to share the burden of conservation among all user groups and no longer prioritize commercial harvest.

Available evidence proves shallow gillnets reduce king salmon harvest. We need to change the mesh depth gillnetters use to target sockeye to protect king salmon. This is why I support Proposal 106.

The Board of Fish adopted a Mixed Stock Policy and I support decreasing time, methods and means and other commercial fishery limitations to protect weaker salmon stocks such as late-run Kenai kings and Susitna sockeye.

Commercial fishing near the mouth of the Kasilof and Kenai Rivers is similar to an on/off switch allowing fish to enter the river. I support increasing the commercial fishing closure “window” from 36 hours to 48 hours to increase escapement and increase opportunity for Alaskan residents to harvest sockeye salmon. This is why I support Proposal 90.

I thank the Board for historic actions taken in 2020 to protect late-run Kenai king salmon and other weak stocks of salmon. I support equitable sharing of the burden of conservation among all user groups to protect and rebuild these stocks. Now is not the time to expand commercial fishing or lower escapement goals. In times of low abundance, we must put the fish first and allow more fish onto the spawning grounds.

Sincerely,

William Cohen
Kenai, AK

Submitted by: Nancy Conklin
Community of Residence: Alexander Creek, AK

I support Proposal 231 changing the dip net dates to July17 to Aug 7 because there are few salmon running in the Susitna River between July 10 and 17. Moving the season forward a week would align better with the sockeye, pink, chum and sockeye runs.

I also support the idea presented in Proposal 229 to add either Mondays or Fridays to the season so people who can only get to the Susitna on weekends will have more than one chance to harvest the salmon.

February 8, 2024

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

Dear Board of Fisheries,

I have been married to a commercial salmon fisherman for 38 years and have made our living on salmon and hatcheries for that long. My children and grandchildren's children will be 3rd and 4th generation fishermen. Hatcheries have extended our seasons by at least two months. We support their contributions to all of Alaska.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Sincerely,
Marianne Connor
[redacted]
Petersburg, Alaska

February 5, 2024

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

Dear Board of Fisheries,

I commercial fish in Petersburg, Alaska. Since the inception of salmon hatcheries in Alaska, my salmon seasons have become longer and more stable.

I appreciate your dedication to the conservation and sustainable management of Alaska's salmon fisheries. The Board of Fisheries full consideration is crucial in shaping the future of our salmon resources.

Support for Removing Proposal 59:

I support the decision to remove Proposal 59 from the Kodiak meeting agenda because I believe it is essential to distinguish between proposals that modify regulatory changes within specific regions and those with statewide hatchery implications. This was an important action in regards to precedent and process. Statewide hatchery issues, including any regulations with statewide precedent, should be addressed at a statewide venue. This ensures consistency and fairness in the decision-making process.

Statewide vs. Regional Precedent:

When addressing statewide hatchery issues that have the potential to establish precedents or modify hatchery regulations impacting multiple regions, it is essential to do so within a statewide venue rather than restricting discussions to regional meetings. Salmon hatcheries are integral to Alaska's fisheries, influencing various regions and user groups. Numerous hatcheries are linked with Pacific Salmon Treaty mitigation obligations. Decisions made solely at the regional level may lack the comprehensive perspective necessary to ensure consistency and fairness in overarching hatchery management decisions. Holding these discussions at a statewide level allows for a more inclusive and well-informed decision-making process, involving stakeholders from all regions. This approach considers the diverse interests and nuances of Alaska's intricate salmon fishery landscape, ultimately contributing to the long-term sustainability of our fisheries and ensuring that hatchery-related regulations align with the overarching goals of responsible resource management. Most hatcheries operate sport, personal use, and subsistence programs that can only exist with the financial support of the PNP organization.