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31 January 2012

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

RECEIVED

FEB 1 2012

BOARD

Re: Oppose Finfish Proposal 312

I oppose Finfish Proposal 312 as it is arbitrary and capricious in that it prohibits the flexibility for the Alaska Department of Fish and Game (ADF&G) to manage the troll coho catch in a fair and equitable manner and, in the long run, is likely to result in the direct reallocation of cohos away from the troll fleet.

Proposal 312 is disruptive and will prove to be unfair to the troll fleet, particularly during years of high coho abundance. The commercial harvest guideline allocations between gear groups has long been settled history (since 1989) through exhaustive and extensive Board discussion. The only realistic way for industry to be held as close as possible to these established guideline harvest percentages is for our common regulatory agency, the ADF&G, to manage each fishery first for sustained yield, then as closely as possible for allocation.

Proposal 312 states: *"Who is likely to suffer? Outside water commercial troll fishermen."* I fail to see where I, who at times fish as an *"inside troller"*, stand to *"benefit"* when the reality of Proposal 312 will close all trolling. The rationale of using *"inside waters commercial fishermen, i.e., inside trollers"* versus *"outside water commercial troll fishermen"* in this proposal is disingenuous, and demonstrates a lack of knowledge of troller movements.

I am a second generation Alaska troller fishing both inside and outside waters, beginning in 1964 crewing for my dad aboard the F/V Pegge. It is disheartening to see the return to another "fish war" between gear groups. It is unacceptable for the United Southeast Alaska Gillnetters Association to attempt to manage the troll fleet's coho allocation.

I urge the Board of Fish to reject Finfish Proposal 312. Thank you for this opportunity to comment.

Respectfully,



Charles E. "Ed" Wood
F/V Talon
P.O. Box 383
Petersburg, AK 99833-0383
907-772-3480

cc: Alaska Trollers Association

W. B. CAMERON
F/V MYRNA ROSE
3640 Tongass Blvd.
Juneau, AK 99801
907-789-9072
Fax: 907-789-7324
e-mail: wlcam@acsalaska.net

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February 1, 2012

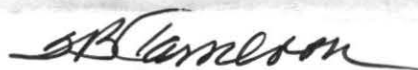
Alaska Dept. of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Sirs,

In regard to your proposed regulations, I would submit the following.

- #253 I am in favor of this regulation.
- #285-#287 I am not in favor of repealing the 58' vessel limit in the S.E. Seine Fishery or of the increased length of vessels to 75' but I am in favor of excluding stern ramps and rollers in the 58' limit for S.E. Alaska.
- #288 I am against this proposal.
- #312 I am strongly against this proposal. A mandatory ten day closure is an unjust hardship for the troll fishery. If conservation is the issue, why aren't all the fisheries participating?

Thank you for your consideration of the above.



William B. Cameron
F/V Myrna Rose

cc: ATA; SEAFAR

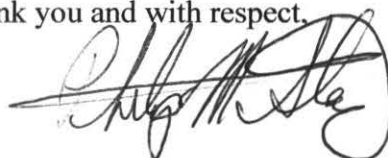
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To Whom It May Concern,

1/24/2012

I am Philip "Rich" Stage. I have had a residence in the Township of Loring, located on the northern shore of Naha Bay Alaska for over thirty-one years, and have been an Alaska resident for Forty years. I have recently learned of the proposals #141,142,143,144 presented for discussion at your next SE- Yakutat Fin Fish Meeting scheduled in Ketchikan this coming in February 24, 2012. The first order of business for me would be to come out in loud opposition to these proposals. While these proposals are generated from an understandable concern for the perceived over fishing of this particular area, I cannot support it in that it is not based on science but emotion and anecdotal reports. The authors of these proposals sincerely feel that these areas are in need of protection, they have little to base their concerns upon, nor do they have the community support their title (Naha Conservation") might suggest. I have fished these areas for years, and yes there has, in my opinion, been a decline in bottom fish as well as shrimp and crab. I have little doubt that it is due to the increase of charter fisheries, lodges, and increasing local pressure, but above all commercial over fishing. This is to be somewhat expected as the area is one of the most popular recreational areas for Ketchikan and a subsistence area for the local residents. As would be expected, there is bound to be a clash between the immediate local population and those from outside the area. However, to make restrictions on this area before it is properly supported by a study or scientific finding is not appropriate at this time. I would think it hard to enforce, unfair and without just cause for people making a living in this area, weather it be from visitor based lodges, recreational, or subsistence use. I can fully understand the frustration it causes those of us with a historical investment in these areas especially when a commercial shrimper, crabber, or long liner fills Naha Bay and the immediate area with more pot and long line buoys than you can count. I do believe that these techniques' have a heavy impact in a confined area already hard hit by the combined above mentioned factors. Therefore I would like myself counted as being in support of some sort of moratorium for heavy commercial harvest in these areas for bottom fish as well as crustaceans. I think it would help the area to recover and give a window of opportunity for a study to be conducted to get some baseline information as to what the area can actually support. I believe a study to be justified, in that the Naha area has been and hopefully will continue to be historically used for these activities. A moratorium might alleviate some of the pressure and help with the ever growing concern over the Naha and its immediate surrounds. It would also help with soothing concerns for those involved in historical subsistence, recreation, and help insure the healthy ecosystem needed for the success for those investing in small scale "Mom and Pop" lodges, at least until the area can be evaluated. All too many times an area seems to have to completely collapse before a deserving closer look takes place. If a commercial fisher has cleaned out an area, they can just pull up and move on. But many times they can literally leave hardship in their wake for those actually living in that area. Therefore I believe some room needs to be provided to breathe deep and take a closer look before it is too late to make a prudent decision. Then it might be easier to proceed with fair decisions predicated on science and understanding.

Thank you and with respect,



Philip Stage

1/29/1012

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Dear Board of Fish,

I was born in Kenai, Alaska in 1953. My father was a teacher at that time in Kenai and went from teaching into the commercial fishing business starting in 1955. As a family we started fishing on set net sites, then went into drift gillnetting, and finally into herring seining and salmon seining.

I now operate my own seiner, the F/V AGHILEEN, with family members and friends. We have fished in the Sitka sac roe herring fishery since 1986. The fishery is very important to us as we are a "fishing family" and depend on our investments in all of the Alaskan fisheries that we participate in. The Sitka fishery is the first fishery of the year for us and we count on it to jump start our entire fishing season. Not only do we depend on this commercial fishery but it also helps begin the spring season for local Sitka businesses, tendermen, fish buyers and processors.

I would like you to know that I strongly support the following proposals coming before the Boart of Fish in February:

I support proposal numbers 227,245 and 273.

I oppose the following proposals up for consideration:

I oppose proposals 230,231,232,238,and 239.

Please take into consideration that we have always fished under the guidelines provided by the scientific community set up by the State of Alaska. Any attempt to alter how we participate in the Sitka herring sac roe fishery based on emotional bias or non-scientific and factual evidence presents no valid reason for taking away fishing opportunity for fishermen and businesses directly involved in the local Alaskan communities.

Thank you for your consideration.



John C. Mitchell
F/V AGHILEEN

RECEIVED
JAN 31 2012
BOARDS

December 31, 2011

Board of Fish

Re: Proposal 292: Change the SE Drift Fishery Schedule

Dear Board of Fish Members,

We are writing in opposition to proposal 292, which would change the start day and time of the Southeast Salmon Drift Gillnet fishery from Sunday at 12:00 PM to Monday at 8:00 AM. The proposal states that the only people likely to suffer are "State fishery monitors who receive overtime pay for weekend openings". However, this proposal would have severe consequences for a segment of the fleet like us, who need to fish Sundays in order to have a viable business.

Many fishing families employ people (captains and crewmembers) that have other jobs outside of the fishery, and their ability to participate in the fishery would be drastically reduced if the fishing time were changed from Sunday to Monday. Additionally, these fishermen invested in boats, permits and gear under the assumption of the traditional Sunday fishery model.

This proposal would effectively force our family and others like us out of the fishery altogether, as well as make it more difficult for other fishermen to maintain a crew, as most other crewmembers cannot support themselves on fishing income alone.

Because this proposal would have severe unintended consequences for some members of the fleet, as well as crewmembers who maintain other jobs, we respectfully request that this proposal be declined. We would, however support a proposal for an earlier start time on Sunday, if necessary.

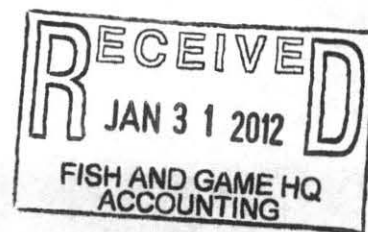
Sincerely,



Luke and Christine Fanning
F/V Kelsie Dawn
Juneau, Alaska

January 25, 2012

Board of Fisheries
Juneau, AK 99



RE: Proposals 233 and 234 Equal split

I oppose converting the Sitka Sound Sac Roe herring fishery into any kind of equal split co-op type of fishery.

1. Stakeholder response to equal split proposals for Sitka are virtually all opposed other than those herring seine permit holders who feel they are at a competitive disadvantage in the fishery as presently conducted.
2. Passage of these proposals will result in a huge loss of jobs in the tendering, fish spotting, and fishing crews as the fleet and support effort consolidates. Alaskan processing jobs will be lost if Canadian processors end up contracting for the majority of the catch. Passage of 233 and 234 will take a very lucrative fishery with widespread economic benefits and concentrate those benefits in the hands of 48 permit holders. We should be maintaining those benefits for all those involved in the Sitka herring fishery. These proposals eliminate jobs with no benefit to the resource.
3. Permit values for Sitka permits continues to be among the highest in the State. Forcing equal split will reduce those values as fishermen will be limited in their possible economic returns.
4. Roe quality is unlikely to be improved without excessive "sifting" of fish looking for higher roe % resulting in unnecessary handling mortality. ADFG will not allow this.
5. Equal split is already available to the fleet if all permit holders agree to it as we have done many times in the past when biological or economic conditions have warranted.
6. Equal split penalized fishing vessels, tenders, and spotter pilots who have upgraded their equipment and skills and redistributes value to the under performers who do not upgrade.
7. If equal split is passed, permit transfers will become rare as the permit becomes purely an investment vehicle leading to guaranteed retirement income. Aspiring up-and comers will have fewer opportunities and little reason to enter the fishery. Is this how we want our fisheries to be?
8. ADFG has done a very competent job of managing the Sitka sac roe fishery with ample opportunity for all user groups to meet their needs. The herring stocks are strengthening - not weakening.
9. Regarding the ramming and jamming incidents which many use as a justification for requesting equal split, I have fished Sitka roe herring since 1985, with above average

success, and have yet to hit or be hit by anyone. The same groups of individuals tend to be involved in most of the incidents. Perhaps some attitude adjustments will be necessary if they can't get insurance.

RE: Proposals 238 and 239 Prohibit herring fishing in "core" area.

These proposals should be rejected. There is no scientific evidence to support the belief that the fishery is affecting the subsistence harvest. ADFG spawn surveys show that there are plenty of eggs available in the near-town "core" area every year and that the fishery does not prevent herring from spawning there. Alaska's fishery resources should be managed on sound biological information. Second, third, or 4+ hand anecdotal "old-timers" recollections, anthropology, psychological studies and such should not be used as the basis of sound management practices.

General comment: Just because the ex-vessel price fell by 2/3 from the previous year does not mean the total economic value of the fishery fell commensurately. Tendering, processing, and other support sectors will continue to provide value at the same level or higher than past years, especially with the increased quota.

Sincerely,



Emil "Beaver" Nelson, permit holder
POB 130
Homer, AK 99603



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



FWS/OSM 12002.SF

JAN 25 2012

Mr. Karl Johnstone, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Johnstone:

The Alaska Board of Fisheries will deliberate 2011/2012 regulatory proposals that address Southeast and Yakutat commercial, sport, personnel use and subsistence finfish fisheries beginning February 24, 2012. We understand that the Board will be considering approximately 145 proposals at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and developed the enclosed preliminary comments on eight (8) proposals which may have an effect on Federal subsistence users and fisheries in this area. We may wish to comment on other proposals if issues arise during the meeting which may have an effect on Federal subsistence users and fisheries.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,


Peter J. Probasco
Assistant Regional Director

CC: Cora Campbell, ADF&G
Tim Towarak, Chair FSB
Jeff Regnart, ADF&G, Anchorage
Hazel Nelson, ADF&G, Anchorage
Charles Swanton, ADF&G, Juneau
Jennifer Yuhas, ADF&G, Anchorage

Scott Kelley, ADF&G, Juneau
Brian Frenette ADF&G, Juneau
George Pappas, ADF&G, Anchorage
Lisa Olson, ADF&G, Anchorage
Monica Wellard, ADF&G, Juneau
Interagency Staff Committee



**FEDERAL STAFF COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSALS
For The
SOUTHEAST AND YAKUTAT MANAGEMENT AREAS
FINFISH**

**State of Alaska
Board of Fisheries Meeting
24 February-4 March, 2012
Ted Ferry Civic Center
Ketchikan, Alaska**

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Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation.

Proposals 238/239 request establishment of a subsistence herring fishing only area in Sitka Sound.

Existing State Regulation

Subsistence Fishfish Fishing

5 AAC 01.700. Description of the Southeastern Alaska Area. *The Southeastern Alaska Area includes all waters between a line projecting southwest from the westernmost tip of Cape Fairweather and Dixon Entrance.*

5 AAC 01.705. Description of districts and sections. *Districts and sections are as described in 5 AAC 33.200.*

5 AAC 01.716. Customary and traditional subsistence users of fish stocks and amount necessary for subsistence users.

(7) herring and herring spawn in waters of Section 13-A, and Section 13-B north of the latitude of Aspid Cape;

Herring Fishery

5 AAC 27.150. Waters closed to herring fishing in Southeastern Alaska Area.

(a) Herring may not be taken in Wrangell Harbor inside a line from the southwest point of the Alaska Wood Products, Inc. wharf to the light on Shekesti Point.

(c) Wrangell Narrows is closed to herring purse seining between the latitude of Blunt Point and the longitude of Prowley Point Light.

(f) Repealed 12/29/84.

(g) Herring may not be taken in any waters of Favorite Bay.

(h) *Herring may not be taken in*

(1) *District 1, in the waters of Clover Pass, Tongass Narrows, Moser Bay, and Naha Bay that are south and east of a line from Indian Point located at 55° 36.85' N. lat., 131° 42.03' W. long., to the northeastern tip of Betton Island located at 55° 32.56' N. lat., 131° 47.66' W. long., to a point on the southwest tip of Betton Island located at 55° 30.22' N. lat., 131° 50.32' W. long., to Guard Island Light, to Vallenar Point located at 55° 25.58' N. lat., 131° 51.09' W. long.;*

(2) *Kasaan Bay west of a line from Island Point to Grindall Point, including all waters of Skowl Arm, Polk Inlet, McKenzie Inlet, and Twelve Mile Arm;*

(3) *District 5; and*

(4) *the waters of District 6 west of the longitude of Point Colpoys.*

Southeast Alaska Area

5 AAC 33.200. Fishing districts and sections.

(m) District 13: all waters north of the latitude of the southernmost tip of Helm Point and west of a line from the southernmost tip of Helm Point to the westernmost tip of Hazy Island to Cape Ommaney Light, south of a line projecting west from the southernmost tip of Cape Spencer, west of a line from the southernmost tip of Cape Spencer through Yakobi Rock to Yakobi Island, south of a line from the northernmost tip of Soapstone Point to the westernmost tip of Column Point and west of a line from the southernmost tip of Point Hayes to the northernmost tip of Point Thatcher;

(2) Section 13-B: all waters south of 57° 16' N. lat.;

Existing Federal Regulation

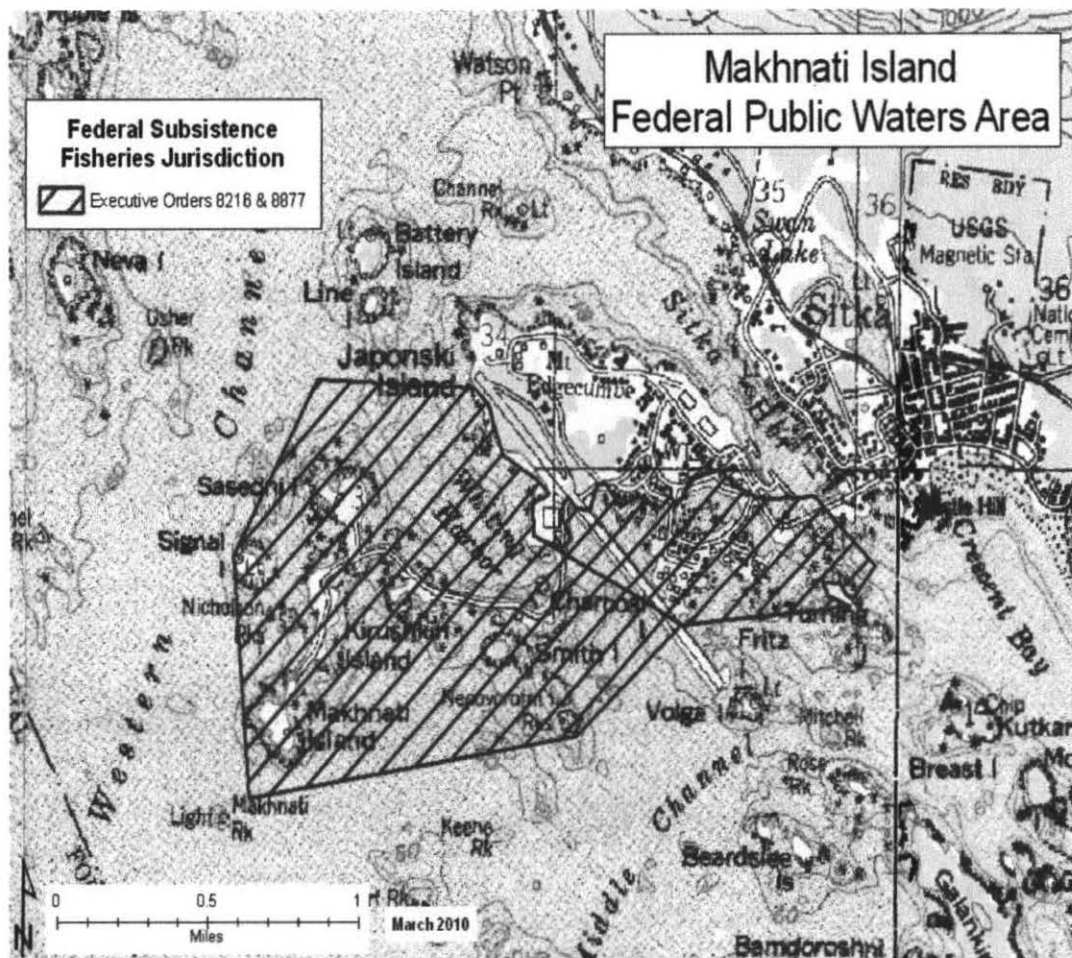
§ __.27(e)(13) *Southeastern Alaska Area*. The Southeastern Alaska Area includes all waters between a line projecting southwest from the westernmost tip of Cape Fairweather and Dixon Entrance.

(i) Unless restricted in this section or under the terms of a subsistence fishing permit, you may take fish other than salmon, trout, grayling, and char in the Southeastern Alaska Area at any time.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal FP09-05 (deferred) seeks to close the Federal Public Waters in the Makhnati Island area near Sitka to the harvest of herring and herring spawn, except for subsistence harvests by Federally qualified subsistence users. This proposal was first deferred by the Federal Subsistence Board in January 2009. The proposal was deferred again for another two years in January 2011. The second deferral was made to allow time for peer review of a Sitka Tribe of Alaska authored research paper on herring management and population assessment of Sitka Sound herring. Additionally, the Sitka Tribe's Herring Research Priority Planning Group may provide additional recommendations regarding the proposal. The Federal Subsistence Board will take up the proposal at the next fisheries regulatory meeting in January 2013. The State currently has fishery management authority for all waters in the Sitka Sound area unless the Federal Subsistence Board

finds it necessary to restrict non-Federally qualified use within the waters under Federal jurisdiction.

Impact to Federal subsistence users/fisheries: The Federal Subsistence Board has not adopted a specific customary and traditional use determination for herring in this area; therefore all rural residents of Alaska may harvest herring and herring spawn. The waters under Federal jurisdiction comprise approximately 800 acres surrounding the Makhnati Islands (see map of Federal Public Waters in the marine waters of Sitka Sound). Whether an area is opened or closed to commercial fishing will not affect whether a subsistence fisher can continue to use all waters of Sitka Sound for subsistence purposes.



Federal position/recommended action: Neutral. The Federal Subsistence Board will consider a similar proposal to close the non-subsistence herring fisheries in waters under Federal jurisdiction in January 2013. Their decision will be determined independently using the information available at that time.

Proposal 247 requests that a management plan be developed for Juneau Road system sport fisheries.

Existing State Regulation.

A fisheries management plan specific to the Juneau Road system is not in State Regulation.

Existing Federal Regulation

A fisheries management plan specific to the Juneau Road system is not in Federal Regulation.

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

Impact to Federal subsistence users/fisheries: No. As described, the options suggested for inclusion within a regulatory management plan would have no effect on either Federally qualified subsistence users or Federal subsistence fisheries.

Federal position/recommended action: Neutral. There is a positive Federal Customary and Traditional Use determination for all fish on the Juneau road system. The Federal subsistence fishery is managed with a Federal Subsistence Fishing permit. The permit lists restrictions designed to provide conservation for sensitive fish stocks and address conservation issues. All Federally qualified subsistence users must obtain and comply with the federal permit and restrictions listed on it. If the Board adopts this proposal, the U.S. Forest Service would like to participate in developing a management plan.

Proposal 250 requests that sport fishers be allowed to retain Chinook salmon caught in freshwater streams in Southeast Alaska.

Existing State Regulation

5 AAC 47.022. General provisions for seasons and bag, possessions, annual, and size limits for the freshwaters of the Southeast Alaska Area.

(b) In the fresh waters east of the longitude of Cape Fairweather:

(1) king salmon: sport fishing for king salmon is closed;

Any Chinook salmon taken incidentally while subsistence or personal use fishing for other species may be retained. In some locations, there is a Chinook salmon personal use fishery to harvest fish in excess of hatchery needs.

Existing Federal Regulation

§ __.27(e)(13) (ii) You must possess a subsistence fishing permit to take salmon, trout, grayling, or char. You must possess a subsistence fishing permit to take eulachon from any freshwater stream flowing into fishing Sections 1C or 1D.

§ __.27(e) (viii) If you take salmon, trout, or char incidentally with gear operated under terms of a subsistence permit for other salmon, they may be kept for subsistence purposes. You must report any salmon, trout, or char taken in this manner on your subsistence fishing permit.

§ __.27(e)(13)(xiv) You may take Chinook, sockeye, and coho salmon in the main-stem of the Stikine River only under the authority of a Federal subsistence fishing permit. Each Stikine River permit will be issued to a household. Only dip nets, spears, gaffs, rod and reel, beach seine, or gillnets not exceeding 15 fathoms in length may be used. The maximum gillnet mesh size is 5 1/2 inches, except during the Chinook season when the maximum gillnet mesh size is 8 inches. (A) You may take Chinook salmon from May 15 through June 20. The annual limit is 5 Chinook salmon per household.

§ __.27(e)(13)(xx) There is no subsistence fishery for any salmon on the Taku River.

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

Impact to Federal subsistence users/fisheries: Adoption of this proposal will change allocation of Chinook salmon between the Federal subsistence and the State managed fisheries. A total of 39 Chinook salmon have been taken in the Federal subsistence fishery, all from Prince of Wales Island streams, since the inception of the permitting program in 2003 (excluding Yakutat and the Stikine River). While the numbers of Chinook currently taken in the Federal subsistence fishery is small, the numbers available for harvest are limited and conservation concerns could arise if another user group is allowed to take Chinook salmon in freshwater. Except for the harvest of hatchery excess Chinook salmon, Federal subsistence users are the only group currently authorized to harvest Chinook salmon in freshwater between Cape Fairweather and Dixon Entrance. There are no Federal regulations restricting this harvest except for the Taku and Stikine Rivers, but current harvest patterns do not contribute to conservation issues and are sustainable. The harvest of Chinook salmon in the Federal subsistence fishery is closely monitored, and all fishers are required to possess a subsistence fishing permit. The Taku River is closed to subsistence fishing and the Stikine River is the only targeted subsistence Chinook salmon fishery in the Region.

Federal position/recommended action: Oppose. The Federal Subsistence Management Program opposes this proposal for Federal public waters (waters within the exterior boundary of the Tongass National Forest, excluding marine waters) for which there is no Chinook salmon fishery management plan. All Chinook salmon stocks are fully allocated among user groups. Most Chinook salmon spawning stocks are small and could not sustain additional directed sport harvest in addition to the mixed stock fisheries harvests already allowed. For some of the larger streams, a fishery management plan could allow a freshwater sport fishery by formally allocating the resource between user groups, providing for the continuation of subsistence use, and requiring monitoring of harvest and escapement.

Proposal 269 would establish a catch report card system for subsistence, personal use and sport finfish fisheries

Existing State Regulation

Subsistence Finfish Fishing

5 AAC 01.730. Subsistence fishing permits

- (a) Eulachon in the Unuk River, and salmon, trout, char, and herring spawn on kelp may only be taken under authority of a subsistence fishing permit.*
- (b) Permits will not be issued for the taking of coho salmon from the Taku River and Stikine River drainages, or for king salmon. However king or coho salmon taken incidentally by gear operated under terms of a subsistence permit for other salmon are legally taken and possessed for subsistence purposes as described in (j) of this section.*
- (c) In the Chilkat River, the subsistence fishing permit holder shall be physically present at the net while it is fishing.*
- (e) The department shall adhere to the following when issuing subsistence salmon fishing permits:*
 - (3) possession limits may be established if resources are limited relative to anticipated harvest levels;*
 - (4) the department may not set any possession limit which jeopardizes the sustained yield of a stock;*
 - (6) the department may require the permit holder to report daily harvests on the catch calendar which accompanies the permit.*
- (g) When issuing a herring spawn on kelp subsistence fishing permit, the department may specify on the permit the times and locations for harvesting and the species of kelp that may be taken. The annual possession limit for herring spawn on kelp is 32 pounds for an individual or 158 pounds for a household of two or more persons. The department will, in its discretion, issue an additional permit for herring spawn on kelp above the annual possession limit if harvestable surpluses of herring spawn on kelp are available.*

(i) The department shall not issue a permit for the taking of steelhead trout, but steelhead trout taken incidentally by gear operated under the terms of a subsistence permit for salmon are legally taken and possessed for subsistence purposes. The holder of a subsistence salmon permit must report any steelhead trout taken in this manner on his or her permit calendar.

(j) Salmon, trout, or char taken incidentally by gear operated under the terms of a subsistence permit for salmon are legally taken and possessed for subsistence purposes. The holder of a subsistence salmon permit must report any salmon, trout, or char taken in this manner on his or her permit calendar.

(k) In addition to the reporting requirement under (e) of this section, the department will, to the extent practicable, use a harvest monitoring program with surveys and interviews to record the harvest of herring spawn on branches, kelp, and seaweed taken in the waters of Section 13-A and Section 13-B north of the latitude of Aspid Cape.

Sport Fishing

5 AAC 47.024 Harvest record required; annual limit.

(a) The following provisions regarding harvest records and annual limits apply to nonresident anglers sport fishing for king salmon in the waters described:

(1) a nontransferable harvest record is required, and must be in the possession of each nonresident angler sport fishing for king salmon in the waters described in 5 AAC 47.005;

c) The following provisions regarding harvest records and annual limits apply to sport fishing for steelhead in the waters described:

(1) a nontransferable harvest record is required, and must be in the possession of each person sport fishing for steelhead in the Southeast Alaska Area;

Personal Use Fishery

5 AAC 77.682. Personal use salmon fishery

(a) Salmon may only be taken under the authority of a personal use fishing permit.

Existing Federal Regulation

§ __.27(c) Fishing permits and reports. (1) You may take salmon only under the authority of a subsistence fishing permit, unless a permit is specifically not required in a particular area by the subsistence regulations in this part, or unless you are retaining salmon from your commercial catch consistent with paragraph (d) of this section.

(2) If a subsistence fishing permit is required by this section, the following permit conditions apply unless otherwise specified in this section:

(i) You may not take more fish for subsistence use than the limits set out in the permit;

(iv) If specified on the permit, you must record, prior to leaving the fishing site, daily records of the catch, showing the number of fish taken by species, location and date of catch, and other such information as may be required for management or conservation purposes;

§____.27(e)(13)(ii) *You must possess a subsistence fishing permit to take salmon, trout, grayling, or char. You must possess a subsistence fishing permit to take eulachon from any freshwater stream flowing into fishing Sections 1C or 1D.*

§____.27(e)(13)(xix) *In addition to the requirement for a Federal subsistence fishing permit, the following restrictions for the harvest of Dolly Varden, brook trout, grayling, cutthroat, and rainbow trout apply: (F) The permit conditions and systems to receive special protection will be determined by the local Federal fisheries manager in consultation with ADF&G.*

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

Impact to Federal subsistence users/fisheries: No. Federally qualified subsistence users in Southeast Alaska are already required to report harvests of salmon, trout, grayling, and char on Federal or State subsistence fishing permits.

Federal position/recommended action: Oppose for subsistence fisheries. This regulation would be duplicative for Federally qualified subsistence users in Southeast Alaska since they are already required to report harvests of salmon, trout, grayling, and char on Federal or State subsistence fishing permits.

Neutral for sport and personal use fisheries. It is important to account for harvest removals by all fisheries to ensure that fishery resources are sustained and harvest opportunities are maintained. We assume that the State already obtains reliable estimates of harvests in sport and personal use fisheries, but defer to their judgment on whether a "catch report card" is needed.

Proposal 273 would require a permit for subsistence herring eggs on branches in Sitka Sound or alter the harvest monitoring program to measure landed weights.

Existing State Regulation

5 AAC 01.730. Subsistence fishing permits

e) The department shall adhere to the following when issuing subsistence salmon fishing permits:

(1) fishing effort must be allowed in places and during times when resource abundance will allow a harvest without jeopardizing the sustained yield of the stock and in a manner which provides for an orderly fishery;

(2) any gear must be allowed which is efficient and economical in light of local circumstances and which provides for an orderly harvest without waste of the resource;

- (3) possession limits may be established if resources are limited relative to anticipated harvest levels;
- (4) the department may not set any possession limit which jeopardizes the sustained yield of a stock;
- (5) a permit is valid for the entire season in which it is issued;
- (6) the department may require the permit holder to report daily harvests on the catch calendar which accompanies the permit.
- (g) When issuing a herring spawn on kelp subsistence fishing permit, the department may specify on the permit the times and locations for harvesting and the species of kelp that may be taken. The annual possession limit for herring spawn on kelp is 32 pounds for an individual or 158 pounds for a household of two or more persons. The department will, in its discretion, issue an additional permit for herring spawn on kelp above the annual possession limit if harvestable surpluses of herring spawn on kelp are available.
- (k) In addition to the reporting requirement under (e) of this section, the department will, to the extent practicable, use a harvest monitoring program with surveys and interviews to record the harvest of herring spawn on branches, kelp, and seaweed taken in the waters of Section 13-A and Section 13-B north of the latitude of Aspid Cape.

Existing Federal Regulation

§ __.27(a)(18) Provisions on ADF&G subsistence fishing permits that are more restrictive or in conflict with the provisions contained in this section do not apply to Federal subsistence users.

§ __.27(e)(13) (ii) You must possess a subsistence fishing permit to take salmon, trout, grayling, or char. You must possess a subsistence fishing permit to take eulachon from any freshwater stream flowing into fishing Sections 1C or 1D.

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

Impact to Federal subsistence users/fisheries: Federally qualified users harvest herring, herring spawn-on-kelp and herring spawn-on-branches from both Federal public waters and waters exclusively under State management authority. In Sitka Sound, Federal public waters include approximately 800 acres of marine waters surrounding the Makhnati Islands (located near the Sitka airport). Federally qualified users would need to comply with additional permitting and monitoring requirements when harvesting outside of Federal Public Waters if this regulatory proposal is adopted.

Federal position/recommended action: Neutral. Herring or herring spawn are not included as a species or a fish product that require a Federal subsistence fishing permit. Therefore, a Federal or State subsistence fishing permit is not required for Federally qualified users to harvest herring, herring spawn-on-branches, or spawn-on-kelp from

Federal public waters. If this proposal is adopted by the Alaska Board of Fisheries, it would have no effect on the harvest of herring spawn-on-branches from waters under Federal jurisdiction.

Proposal 282 requests that conservation measures be modified for Chinook salmon in the "Situk-Ahrnklin and Lost River King Salmon Management Plan" by redefining closed waters, changing "non-sale" to "nonretention", and defining management triggers based on the "projected escapement" rather than on the "projected in river run".

Existing State Regulation

5 AAC 30.365. Situk-Ahrnklin Inlet and Lost River King Salmon Fisheries Management Plan

(a) The purpose of the management plan in this section is to provide for the biological escapement goal requirements of spawning king salmon to the Situk-Ahrnklin River systems. This management plan provides guidelines to the department in an effort to preclude allocation conflicts between the various user groups of the king salmon resource. Action points and associated ranges within the plan are intended to be based on the current king salmon escapement goal ranges for the Situk River system.

(b) The biological escapement goal for the Situk River king salmon is 730 three ocean age and older fish, with a range of 450 - 1,050 fish.

(c) The department shall manage the commercial, sport, and subsistence fisheries as follows:

(1) if the projected inriver run of king salmon to the Situk River weir is less than 350 three ocean age and older fish, the commissioner shall close, by emergency order, the king salmon...

(2) if the projected inriver run of king salmon to the Situk River weir is 350 - 450 three ocean age or older fish the commissioner...

(B) may, by emergency order, implement one or more of the following management measures for conservation purposes:

(i) establish a "non-sale" king salmon season in the Situk-Ahrnklin Inlet and Lost River set gillnet fisheries;

(ii) close the commercial salmon troll fishery in the waters of Alaska bounded on the west by the three-nautical-mile limit and on the north by a line extending seaward from 59° 29.70' N. lat., 139° 44.00' W. long. and intersecting the three-nautical-mile limit at 59° 27.77' N. lat., 139° 49.28' W. long. and on the south by a line extending seaward from 59° 20.30' N. lat., 139° 16.50' W. long. and intersecting the three-nautical-mile limit at 59° 18.25' N. lat., 139° 21.94' W. long.; ...

(3) if the projected inriver run of king salmon to the Situk weir is 451 - 730 three ocean age or older fish, the commissioner shall, by emergency order, implement one or more of the following management measures for conservation purposes:

(A) establish a "non-sale" king salmon season in the Situk-Ahrnklin Inlet and Lost River set gillnet fisheries;

(B) close the commercial salmon troll fishery in the waters of Alaska bounded on the west by the three-nautical-mile limit and on the north by a line extending seaward from 59° 29.70' N. lat., 139° 44.00' W. long. and intersecting with the three-nautical-mile limit at 59° 27.77' N. lat., 139° 49.28' W. long. and on the south by a line extending seaward from 59° 20.30' N. lat., 139° 16.50' W. long. and intersecting the three-nautical-mile limit at 59° 18.25' N. lat., 139° 21.94' W. long.; ...

(D) restrict the sport harvest of king salmon in the Situk River by implementing one or more of the following management measures:

(i) close portions of the Situk River to sport fishing for king salmon;

(4) if the projected inriver run of king salmon to the Situk River weir is greater than 730 three ocean age and older fish but less than 1,050 fish, the department shall, ...

(B) manage the commercial salmon troll fishery as specified in 5 AAC 29.100 in the waters of Alaska bounded on the west by the three-nautical-mile limit and on the north by a line extending seaward from 59° 29.70' N. lat., 139° 44.00' W. long. and intersecting the three-nautical-mile limit at 59° 27.77' N. lat., 139° 49.28' W. long. and on the south by a line extending seaward from 59° 20.30' N. lat., 139° 16.50' W. long. and intersecting the three-nautical-mile limit at 59° 18.25' N. lat., 139° 21.94' W. long.;

(5) if the projected inriver run of king salmon to the Situk River weir is greater than 1,050 three ocean age and older fish, the department shall manage the commercial, sport, and subsistence fisheries as necessary to harvest large king salmon in excess of the biological escapement goal range; to achieve this goal the commissioner may, by emergency order, implement one or more of the following management measures: ...

Existing Federal Regulation

§ __.27(e)(12) Yakutat Area.

(i) Unless restricted in this section or unless restricted under the terms of a subsistence fishing permit, you may take fish at any time in the Yakutat Area.

(ii) You may take salmon, trout (other than steelhead), and char only under authority of a subsistence fishing permit. You may take steelhead trout only in the Situk and Ahrnklin Rivers and only under authority of a Federal subsistence fishing permit.

(iii) If you take salmon, trout, or char incidentally by gear operated under the terms of a subsistence permit for salmon, you may retain them for subsistence purposes. You must report any salmon, trout, or char taken in this manner on your permit calendar.

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

Impact to Federal subsistence users/fisheries: The ability of Yakutat residents to harvest salmon in the Situk River for subsistence uses is affected by State management of the commercial set gillnet fishery in the Situk-Ahrnklin estuary and the commercial troll fishery in the Yakutat area.

Federal position/recommended action: Neutral. The Federal Subsistence Management Program is very concerned by recent low returns of Chinook salmon to the Situk River. The Federal Subsistence Management Program supports efforts to identify and account for all sources of fishing mortality on this stock, and would like to be involved with any discussions and committee work concerning revisions of the "Situk-Ahrnklin and Lost River King Salmon Management Plan". The U.S. Forest Service's Yakutat District Ranger is the in-season manager for Situk River Federal subsistence fisheries, and is responsible for specifying permit conditions that recognize the Federal subsistence priority while providing for conservation of the Chinook salmon population.

Proposal 294 would require reporting of commercially caught salmon and steelhead retained for personal use.

Existing State Regulation

Subsistence Finfish Fishing

5 AAC 01.015. Subsistence fishing permits and reports

(a) Salmon may be taken only under the authority of a subsistence fishing permit issued by the commissioner, unless a permit is specifically not required in a particular area by the subsistence regulations in this chapter, or unless the fisherman is retaining salmon from the fisherman's commercial catch consistent with 5 AAC 39.010.

Southeast Alaska Area

5 AAC 33.395. Reporting requirements

The commissioner may, by emergency order, close a commercial salmon fishing season and immediately reopen a commercial salmon fishing season during which a CFEC permit holder shall be required to report on an ADF&G fish ticket, at the time of landing, the number of steelhead and the number of king salmon, 28 inches or greater in length, taken but not sold. For the purposes of this section "landing" means the act of offloading fish from a CFEC permit holder's vessel.

General Provisions

5 AAC 39.010. Retention of fish taken in a commercial fishery.

(b) Except as otherwise specified in 5 AAC 01 - 5 AAC 39, a commercial fisherman shall report on an ADF&G fish ticket, at the time of delivery of the commercial catch, the number of steelhead retained from the commercial catch but not sold. For the purposes of this subsection, "delivery" means the offloading of the finfish for sale or for transport to a buyer for later sale.

Existing Federal Regulation Federal regulations do not address the issue of reporting commercial retention, although § ___.27(i)(13)(ii), (xvii) and (xviii) address subsistence taking of steelhead in the Southeast management area.

§ ___.27(i)(13) *Southeastern Alaska Area.*

(iii) *In the Southeastern Alaska Area, a rainbow trout is defined as a fish of the species *Oncorhynchus mykiss* less than 22 inches in overall length. A steelhead is defined as a rainbow trout with an overall length of 22 inches or larger.*

(xvii) *Unless otherwise specified in paragraph (e)(13) of this section, you may take steelhead under the terms of a subsistence fishing permit. The open season is January 1 through May 31. The daily household harvest and possession limit is one with an annual household limit of two. You may only use a dip net, gaff, handline, spear, or rod and reel. The permit conditions and systems to receive special protection will be determined by the local Federal fisheries manager in consultation with ADF&G.*

(xviii) *You may take steelhead trout on Prince of Wales and Kosciusko Islands under the terms of Federal subsistence fishing permits. You must obtain a separate permit for the winter and spring seasons.*

(A) *The winter season is December 1 through the last day of February, with a harvest limit of two fish per household. You may use only a dip net, handline, spear, or rod and reel. The winter season may be closed when the harvest level cap of 100 steelhead for the Prince of Wales/Kosciusko Islands has been reached. You must return your winter season permit within 15 days of the close of the season and before receiving another permit for a Prince of Wales/Kosciusko steelhead subsistence fishery. The permit conditions and systems to receive special protection will be determined by the local Federal fisheries manager in consultation with ADF&G.*

(B) *The spring season is March 1 through May 31, with a harvest limit of five fish per household. You may use only a dip net, handline, spear, or rod and reel. The spring season may be closed prior to May 31 if the harvest quota of 600 fish minus the number of steelhead harvested in the winter subsistence steelhead fishery is reached. You must return your spring season permit within 15 days of the close of the season and before receiving another permit for a Prince of Wales/Kosciusko steelhead subsistence fishery. The permit conditions and systems to receive special protection will be determined by the local Federal fisheries manager in consultation with ADF&G.*

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

Impact to Federal subsistence users/fisheries: No.

Federal position/recommended action: Support with Modification. The Federal Subsistence Management Program supports this proposal with a modification to require that all steelhead retained in commercial fisheries be reported on fish tickets. Accurate

accounting of the steelhead harvest is important to both State and Federal management and should be a standard requirement for commercial and non-commercial fisheries. The Federal Subsistence Management Program does not agree that reporting the harvest to sport fishery creel census personnel will result in a more efficient or accurate harvest estimate than including this take on a fish ticket. The Federal Subsistence Program continues to support reporting all mortality sources of steelhead in all fisheries in Southeast Alaska. These data have not been available since 1994, when the Alaska Board of Fisheries adopted 5 AAC 33.394, which prohibited the sale of steelhead taken in commercial salmon purse seine and drift gillnet fisheries. Management of steelhead populations is complex and controversial, and the Federal Subsistence Board has received numerous steelhead proposals in past fishery regulatory cycles. Questions related to the level of steelhead by-catch in commercial fisheries are brought before both the Federal Subsistence Board and the Southeast Regional Advisory Council on a regular basis. However, managers are not able to provide answers on the current level of take in commercial purse seine and gillnet fisheries. Adoption of this proposal, with the requested modification, would provide valuable information on steelhead take in Southeast Alaska fisheries.

End



United States
Department of
Agriculture

Forest
Service

Alaska Region
Tongass National Forest
Juneau Ranger District

8510 Mendenhall Loop
Juneau, AK 99801
Phone: (907) 586-8800
Fax: (907) 586-8808

File Code: 2630

Date: January 26, 2012

Shannon Stone
Alaska Board of Fish
PO Box 11526
Juneau, AK 99811

Dear Ms. Stone:

The Juneau Ranger District is writing in support of Proposal #247 that seeks to develop a management plan to protect and enhance the Juneau Roadside Sport Fishery. Several aspects of the proposal are directly in line with US Forest Service objectives to promote the stewardship of fisheries resources. If Proposal #247 is adopted, information gathered on the roadside fishery would help the Juneau Ranger District better manage fisheries resources to the benefit of local users. In addition, continued efforts to evaluate alternative stocking options for a put-and-take fishery will help further support the shared goal of providing a variety of fishing opportunities accessible to all age groups.

Our agency frequently works in coordination with the Alaska Department of Fish and Game and other participating organizations to create, enhance, and restore fishing opportunities across the state. The Forest Service has been an active partner in the successful Hunters Education program in Juneau and fully supports this same model being applied to teach students about safe, responsible and sustainable fishing practices. Education and opportunity are some of the most valuable gifts to offer a community and Proposal #247 will help fulfill these objectives.

Sincerely,

MARTI M. MARSHALL
District Ranger



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

RECEIVED
JAN 24 2012
BOARDS

Re: Proposals before the board

Honorable Board of Fish Members,

My name is Theresa Allen-Olson, I am Alaska native, I live in Sitka.
I was raised in Fairbanks, my family live along the river systems of the interior and on the coast.
I do not support Proposal numbers 238 and 239, that will close areas to the commercial sac roe fishing fleet in Sitka Sound.

There is no lack of subsistence opportunity or area in Sitka for roe on branches.

The sac roe commercial fishing fleet has had no negative impact on the herring in the Sitka Sound region, the harvest formulas are working. The herring stocks in Sitka Sound are expanding and are extremely healthy, with no foreseeable reason that should change.

My family, are subsistence, sport, and commercial users of our resources. We have always had ample opportunity for the harvesting of subsistence products in this region, including herring roe on branches.

Closing protected waters will put people needing the work and income in harm's way.

Families in Sitka encourage friends and relatives to plan vacations to Sitka during this season to see this fishery along the road system. This viewing keeps the fishery transparent. The general public has the right to see the harvest of this and all resources when possible.

There is no real conflict between these user groups; they can work together.

I have enclosed photos of the subsistence product provided at the dock. People with full time jobs, or no boat and involved in other activities love that they can swing by the dock and pick up as much herring eggs as they need without any expense to them.

Thank you.

Theresa Allen-Olson



Roe on branches provided by the F/V Julia K.
Note size of bagged product for pick up.

Roe on branches provided by another unknown harvester.



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

RECEIVED
JAN 24 2012
BOARDS

Re: Proposals before the board

Honorable Board of Fish Members,

My name is Sidney Wyman, I am an Alaska Native as well as a Sitka Tribe member. I reside in Sitka, Alaska and am involved first hand with the sac roe fishery.

I do not support proposals 238 and 239, that will close areas within Sitka Sound to the commercial sac roe fishing fleet.

I believe there is no shortage of subsistence opportunities to those who harvest herring roe on branches around Sitka Sound.

The commercial fishing fleet has no negative impact on the herring stock in Sitka Sound region. The commercial fleet is heavily regulated and managed by an extremely knowledgeable team of people who care first and foremost about the resource and take all issues, comments, and welling being of every participant into consideration before opening any area to the commercial fishing fleet.

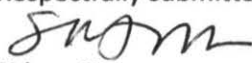
I have seen this fishery grow since I was a little girl fishing on the docks in Crescent Harbor from a fleet coming and going in two weeks to now over a month. Because it is being managed properly, it is being fished by people who want the best for everyone involved, including those who use the resource for subsistence use.

If you were to come to Sitka during this time of year there is an excitement in the air that you cannot explain. It's an energy that locals want everyone to feel and thus invite families and friends to come to Sitka to see the excitement we are so lucky to witness first hand.

Closing protective waters to the commercial fishing fleet is unnecessary. My friends and family continue to gather roe on branches that meet their needs and even the needs of their gardens.

There is plenty of opportunity to gather herring eggs without forming a subsistence only area.

Respectfully submitted,


Sidney Wyman

January 18, 2012

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

RECEIVED
JAN 24 2012
BOARDS

To Whom It May Concern:

Please find enclosed my written testimony to the Board of Fish concerning the herring proposals that will be considered at the Ketchikan meeting at the end of February, 2012.

Thank you for your help in getting this to the Board Members for their consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles R. Olson', written in a cursive style.

Charles R. Olson

COMMENTS TO THE BOARD OF FISH, STATE OF ALASKA, FOR THE FEBRUARY
2012 FINFISH MEETINGS IN KETCHIKAN

RECEIVED
JAN 24 2012

BOARDS

My name is Charles Olson. I am a resident of Sitka, AK and a recently retired Sitka roe herring fisherman of 32 years. I still participate in the Hoonah Sound roe on kelp fishery. I will testify on several of the proposals before you on this finfish cycle all of which are related to herring.

On proposal 225 I support all of the changes proposed by the Dept. of Fish and Game **except Item K, Line 3**. The requirement to have the permit holders name on the Tow Pen would be too cumbersome since often a Tow Pen is pushing fish for 5 or 6 different fishermen. It is more appropriate to have the **ADFG number** of the support vessel required on the Tow Pen as it will be on the bouys and other supporting equipment.

I do not support Proposal 231. The Department has done an excellent job of controlling the fishery. In the past ten years they have never exceeded the guideline harvest level by more than 2% and have under harvested 60% of the time. It would increase the risk of going over the harvest level because the Dept. would try to hit the number as close as they possibly could.

I do not support Proposal 232. The current harvest formula was established by the Board of Fish after a great deal of deliberation. The reason that the formula was changed was because they increased the threshold level for the Sitka herring fishery from 7,500 tons to 25,000 tons. This increase was so large that they felt that the resource could support a higher harvest rate as the biomass grew. They were obviously correct since the resource has grown significantly every year since. This is a formula that works well and there is no reason to change it.

I support Proposal 233 and 234. The fishery continues to be dangerous and destructive to the vessels and gear involved in the harvest. In the past five years my net has been run over with significant damage on four occasions costing me thousands of dollars to rebuild it. There have been numerous boat collisions and it is only a matter of time until someone is killed or seriously injured. A controlled fishery would provide better product to the market and increase the revenue in the fishery.

And finally, I am adamantly opposed to Proposal 238 and 239. There is absolutely no need for a subsistence only area in Sitka Sound for herring eggs on branches. The area that they are proposing is the core area of the commercial fishery. It is the area with sheltered waters that are safe for the commercial fleet to operate. It is the area where the community is able to view and participate in the fishery. It is the area that the fish consistently return to spawn in vast numbers creating an opportunity for all user groups. My family has participated in the harvest of eggs on branches for years and have never had a problem harvesting all of the product we need for family and friends. This is just a ploy by those who made this proposal to limit the ability of the commercial fleet to harvest the entire quota. This is problem that is fabricated rather than real.

Sara E. Miller
Fishing4AKTokens
4029 Deborah Dr.
Juneau, AK 99801
(907) 463-1262

January 11, 2012

Dear Board of Fisheries:

I am writing this letter in support of BOF proposal #325.

My husband and I are chum troller association members. My husband has been a troller in southeast Alaska since 2008 and I have been a crewmember on his boat throughout the years. I recently received my Ph.D. in fisheries from the University of Alaska Fairbanks specializing in salmon.

My husband is new to the commercial industry and we own a small troller in Juneau. Due to the size of our boat, my husband prefers to fish the inside waters, closer to Juneau. In recent years, he has been able to profit from the new niche market for brite chums. My husband foregoes the first Chinook salmon opener to instead target these chums in early July in the inside waters of Icy Strait.

A market for these chums is increasing in profitability not only for the commercial fisherman and their families, but for the processors and the economies of the local communities. The 2011 ADFG figures show Icy Strait troll chums worth over a million dollars to the fishermen. Commercial fishing has a ripple effect. These new markets for the commercial trollers means more fish for the processing plants in northern southeast Alaska, which could increase employment in the processing plants, along with bringing more money to the local communities of southeast Alaska as Elfin Cove, Hoonah, Pelican, and Juneau. Fishermen visit these communities to refuel and restock food and supplies for their trips, along with getting a good meal and rest for a night at a local restaurant and hotel. My husband has frequently used the local airlines and float plane services to fly parts to remote locations where he is harbored.

Along with the economic benefits, as a fishery biologist, I know the importance of good management and low by-catch in the salmon industry. This proposal gives ADFG the flexibility to manage for hatchery chum troll harvest in these areas as well as hatchery Chinook troll harvest. The inclusion of the Hawk Inlet/Funter Bay area in late June would disperse the troll fleet toward known availability of hatchery chums. Since chum trollers are capable of selectively harvesting hatchery chums by the size of their hooks, speed of their boat, and by not using bait, this fishery has virtually no by-catch. Plus, chum trollers fish mostly offshore, away from the sportfishermen and charter boats.

Based on the economic returns to local communities of southeast Alaska and ultimately to the state, enhanced opportunities for sound management by ADFG, and increased opportunity for safer fishing for my family and other commercial fishing families, I urge the Board of Fisheries to accept proposal #325 on behalf of the commercial salmon trollers and their families in Southeast Alaska and the Chum Trollers Association.

Sincerely,

Sara E. Miller

Sara E. Miller
Wife of a SEAK Troller
ATA and CTA member

Alaska Board of Fish
Box 11526
Juneau, AK
99811
Attention: Shannon Stone

RECEIVED
JAN 26 2012
BOARDS

As a teenaged resident of the city of Juneau, I am in strong support of proposal #247. Being so young, I do not have a boat of my own to take out at my will to get to good fishing spots. As a result, I am limited to what is along the road system. I feel that this proposal will improve the current fish populations and make it so that when I am old and gray, I will be able to take my grandchildren fishing along the road system and still have a chance to catch fish.

Thank you for considering this proposal

Luke Brockmann

1/23/12

ATTN: BOF Comments
Board Support Section
ADF&G
P.O. Box 115526
Juneau, Ak99811-5526

Greetings,

My family and I live in Sitka and I have been a troller for 23 years. Although I participate in the longline and sea cucumber fisheries trolling is the mainstay of my operation.

I am writing to support Proposals 325 and 326 dealing with expanding access to chum for the troll fleet.

Chum is the species that is most widely produced by the hatcheries because they are easier and more affordable to grow. Trollers are behind in the enhanced fish allocation ratio. Given fish production trends as they are, if we are going to ever get closer to the allocation we will need to catch more chum. These are two ideas that give trollers a better chance at getting chum while minimizing impact to other user groups.

Thank you for your time and service.

Bert Bergman
801 Charles St.
Sitka AK. 99835



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

Honorable Board of Fish Members:

My name is Karen Johnson. I live in Sitka, Alaska. I am an Alaska native and Alaska subsistence harvester.

Over the years I have subsistence harvested herring roe and have never had any trouble meeting my needs or my families and friends needs. Even after the commercial sac roe herring fleet has fished.

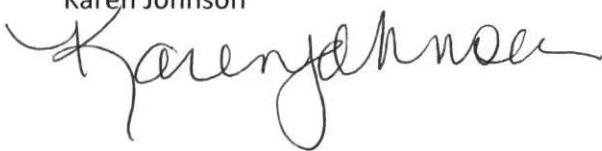
I have even gathered without the use of a boat and gotten as much as I needed.

I do not support proposals # 238 & #239.

There is ample opportunity for subsistence harvest of eggs on branches and even kelp, without restricting the commercial fleet, by forming a subsistence only area.

Respectfully submitted,

Karen Johnson

A handwritten signature in cursive script that reads "Karen Johnson". The signature is written in dark ink and is positioned below the printed name.



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

January 11, 2012

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

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JAN 12 2011

BOARDS

Dear Board Members:

The following comprises the position of the Territorial Sportsmen on the proposals for the Southeast Finfish meeting on Feb. 24, 2012 in Ketchikan.

The Territorial Sportsmen is a conservation organization comprised of about 2000 residents of Juneau and Southeast Alaska. We have a wide range of projects and interests relating to hunting and fishing conservation and education in the region. We have developed the following comments for your consideration.

Proposal 210. We favor developing methods to release unwanted rockfish, or rockfish which may be caught after the bag limit for a species is taken. We support proposal 210, but note that a major education effort will be necessary to implement this rule if it applies to unguided residents.

Proposal 211. We prefer proposal 210 instead.

Proposal 213. We are opposed if this were intended to be applied to residents. The existing regulation is much easier to comply with for the same benefit.

Proposal 214. We support requiring dead and injured sablefish to be retained as part of the commercial quota instead of being discarded in order to retain more valuable larger fish.

Proposal 216. We favor repeal of the overly restrictive nonresident bag limits. Restrictions that are not necessary for conservation should be relaxed. The resource belongs to everyone.

Proposal 224. We oppose allowing ling cod to be used as bait. This proposal cannot be remotely justified as long as there are extremely restrictive sport bag limits in place for the same species.

Proposal 249. We are opposed to annual limits for sockeye, coho, chum and pink salmon for anyone in Southeast, resident or nonresident. There is no conservation problem identified that would warrant such an onerous restriction.

Proposal 250. TSI is not opposed to creating new fresh water fisheries, if the stocks are not already allocated. Taku King salmon are fully allocated among existing fisheries. Further pressure on this resource is not warranted.

Proposal 252. We are opposed to restricting electric reels to handicapped persons. This proposal is just a back door approach to closing the sport black cod fishery, which is not warranted by any measure.

Proposal 255. As we indicated in proposal 250, we are not opposed to opening a new fishery on the Taku, "if" the resource is not already allocated. The Taku River has been closed to king salmon sport fishing for many decades. This river is highly regulated for achieving king salmon escapement pursuant to international treaty. There is no harvestable surplus that is not already fully allocated to existing users. There is adequate opportunity available for everyone to harvest Taku king salmon in salt water. If more liberal fishing is warranted, the salt water restrictions can be adjusted to take more fish.

Proposal 269. We are opposed to requiring further catch reporting for all subsistence, personal use and sport fisheries. No measurable benefit would accrue from implementing such a costly and unnecessary reporting regime.

Proposal 271. We favor clarifying the closure of the personal use sablefish fishery before and after the commercial fishery.

Proposal 274. We are opposed to expanding the personal use fishery to include the use of nets or power and hand troll gear for king salmon and coho salmon. These species are already taken at maximal yield levels in existing fisheries. King salmon particularly do not need additional harvest. This relaxation would just change who gets to harvest the available fish. The resource has been fully allocated for a long time.

Proposal 277. We are opposed to allowing dip netting in the Taku River, particularly for king salmon. Taku salmon stocks are fully allocated and under intense management and exploitation by management agencies and user groups in two countries. There are numerous opportunities in marine waters to take Taku bound fish. Additional pressures are not warranted. There is no large surplus of salmon going unharvested in this system.

Proposal 278. We are opposed for the same reasons set out in the previous proposal.

Proposal 308. We are opposed to increasing troll effort in inside waters. Although the stated target is chum salmon, king and coho salmon will be directly harvested. King and coho stocks are already harvested at maximal levels in the region by existing fisheries. Increasing troll effort will upset existing allocations for these stocks. If this added effort is approved, there will be a major push to allow 6 lines everywhere at all times that the troll fishery is prosecuted, all under the guise of catching more chum salmon. And if you allow a 50% gear expansion here, how will you justify disallowing it everywhere else?

Thank you for considering our comments. We plan to send a representative to the Ketchikan meeting.

Sincerely,

A handwritten signature in cursive script that reads "Wayne Regelin by Ron Somerville". The signature is written in dark ink and is positioned above the printed name and title.

Wayne Regelin, President
Territorial Sportsmen



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094
February 6, 2012

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BOARDS

Dear Chairman Johnstone and Board members,

Proposal #326 comes after Chum Trollers Association members familiar with the 11A area requested we propose chum troll opportunity in the area. This proposed area is sited between the 15C gillnet area and the Amalga Harbor cost recovery area. It proposes the opportunity for ADF&G to allow, by emergency order management authority, pink and chum trolling the first 20 days of July. It is smaller than the small area in 15C (known as the "postage stamp area") in the ADF&G 2011 Management Plan for the Lynn Canal (15C) drift gillnet fishery. Several of our members are familiar with the area through experiences handtrolling in the 70's, gillnetting in 15C, or sportfishing. This proposal is carefully crafted to avoid sport drags for Chinook and Coho.

Covering only a small area and for a short duration of the season, proposal 326 has the potential to create a significant troll opportunity in the Juneau area. Juneau is unique in the Southeast region in that there is currently no nearby water available for the 200 Juneau area troll permit holders. This proposal would provide a very useful opportunity for Juneau trollers.

Most DIPAC chums are bound for terminal areas resulting in millions of dollars of revenue in excess of cost recovery needs now that DIPAC has paid off its loans. With the gillnet fishery in Lynn Canal managed around a by-catch limit of Chilkoot and Chilkat Sockeye, and limited in the amount of time they are allowed to target DIPAC chums, gillnetters are not able to catch all these chums excess to cost recovery needs. Chum trollers, who are well behind in their SE enhanced salmon allocation, would like the opportunity to harvest DIPAC Chums.

Many questions have come up regarding the potential for this fishery, likely by-catch of Chinook and coho, amount of effort expected, how many days a week chum trollers would be fishing, will terminal area chums bite, how much the fishery could be worth to trollers, why the JRPT did not endorse, and whether chum trollers would be willing to make amendments to accommodate other interests. We have prepared an answer sheet (attached) to try and answer these good questions.

While this proposal was not endorsed by the SE enhanced salmon Joint Regional Planning Team, due to opposition by gillnetters, it was also not asked to be withdrawn. We are hopeful that, after taking a good look at the economic opportunity this proposal presents for trollers and the likely relative minimal comparative loss to gillnetters, who are well ahead of their SE enhanced salmon allocation percentage, the Board will support.

Sincerely,

Chum Trollers Association
103 Gibson Place
Sitka, AK 99835

Chum Troll Answer sheet for questions about proposal # 326.

Chum Troll (CTA) representatives met with Territorial Sportsmen (TS) on this proposal and #325 in Juneau in January. They had some great questions about whether chum trollers would be willing to use barbless small hooks and if there was a way to limit the # of trollers fishing in this area.

Some of our members have used barbless hooks for many years due to the ease of removing the barbless hooks from tough chum mouths. Our board discussed the issue and is willing to consider barbless in 11A if it is necessary for adoption of this proposal but feel the low by-catch rate in our fishery does not necessitate barbless hooks.

Almost all chum trollers are using size 6/0 or smaller hooks to target chums without regulation. Our board is prepared to consider size 6/0 or smaller hooks in 11A if necessary for adoption of this proposal.

Based on experiences and catch data in other terminal areas we expect very little by-catch of any salmon other than the targeted chums and pinks.

TS also asked how much troll effort to expect in this area if opened to trolling. CTA can't predict future effort but noted ADF&G estimated 58 trollers targeting chums in Icy Straits from the 3-10th, and 27 from the 10-17 in July 2011. CTA thinks the dates corresponding with the summer Chinook opening and good Behm Canal chum fishing will minimize exploratory effort here in 2012, but there will be some, probably by Juneau area trollers, and, if it proves productive, then troll effort will build.

Based on conversations with ADF&G staff CTA believes chum trollers could be allowed 3-4 days a week, likely corresponding to gillnet fishing time in the postage stamp area of District 15C.

Experienced chum trollers are confident they will figure out how to get DIPAC chums in 11A to bite.

Based on experiences on NSRAA chums in Eastern Channel and SSRAA chums in Neets Bay CTA expects the 11A chum troll fishery could eventually produce tens of thousands of chums worth hundreds of thousands of dollars to the troll fishery.

The JRPT did not support because gillnet representatives opposed adoption. Gillnetters did not ask CTA to withdraw #326. CTA respects the gillnet position because trolling in 11A will undoubtedly intercept a percentage of chums backing up into gillnets in 15C. Nevertheless, we are optimistic the BOF will see a larger picture and approve. We are encouraged by the close 6-5-1 vote by the Juneau AC to oppose #326.

CTA is willing to work with all interest groups to try to accommodate concerns on proposal #326.

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Sitka, AK
Dec. 28th, 2011

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BOARDS

Dear BOF and Boards Support.

Chum Trollers Association would like to notify the BOF, ADF&G, and Boards Support Section that we support the amended wording for BOF proposal #325 adopted by the JRPT. Amended proposal (Sections to be omitted highlighted in yellow) attached.

Following is the wording adopted by the JRPT on proposal #325, page 306 of the proposal book:

- Proposal #325 (chum hatchery access to trolling in June in sub-districts of districts 9, 12, and 14) The JRPT conditionally supports the proposal with the following recommendations: that section (iii) District 9 and sub-district 114-50 is withdrawn from the proposal, and that the proposal sunsets in 3 years; and that a chum salmon management plan is developed in that three year period. It is expected that the proposed management plan is brought back to the JRPT for review and possible submittal as a BOF proposal for the next cycle. This proposal could help the troll fleet who is below their allocated range of enhanced stocks. Since this fishery would be expanding into new areas and amount of effort there are concerns about the composition of stocks that will be harvested and effects on other fisheries.

Sincerely,
Eric Jordan, Secretary
Chum Trollers Association
103 Gibson Place
Sitka, AK 99835

907-738-2486

Regulation Proposal Form 1. Alaska Administrative Code Number: 5AAC 29.090. Book Page No.93

2. What is the problem you would like the Board to address?

- There is a Board of Fisheries plan, 5 AAC 33.364, which allocates SE enhanced salmon. The troll allocation range is 27-32%. Trollers have harvested 19% since plan inception. Trollers are short approximately \$2.3 million per year.

3. What will happen if this problem is not solved?

In recent years trollers have been paying 35% of the SE salmon enhancement tax while only receiving 19% of the benefit. Without passage of this or similar proposals trollers will continue to be well short of their harvest share.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

5AAC 29.090 (k) Notwithstanding (a) – (d) of this section the commissioner may, by emergency order, extend the length of, or set, weekly fishing periods during the spring fishery to optimize the troll harvest of hatchery chum salmon in the following areas:

(i) District 14, subdistricts, [114-50], 114-21, 114-23, 114-25

(ii) District 12, South of the latitude of Pt. Howard and North of the latitude of Hawk Pt.

[(iii) District 9, (Within Section 9A,) South of latitude 56 degrees 21' and North of latitude 56 degrees 15.83']

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

Troll harvested June chums are usually exceptional "chrome brite" quality and individually handled with great care, live-bled, and immediately chilled.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted? Trollers, processors, tenders, processing workers, local communities, and consumers.

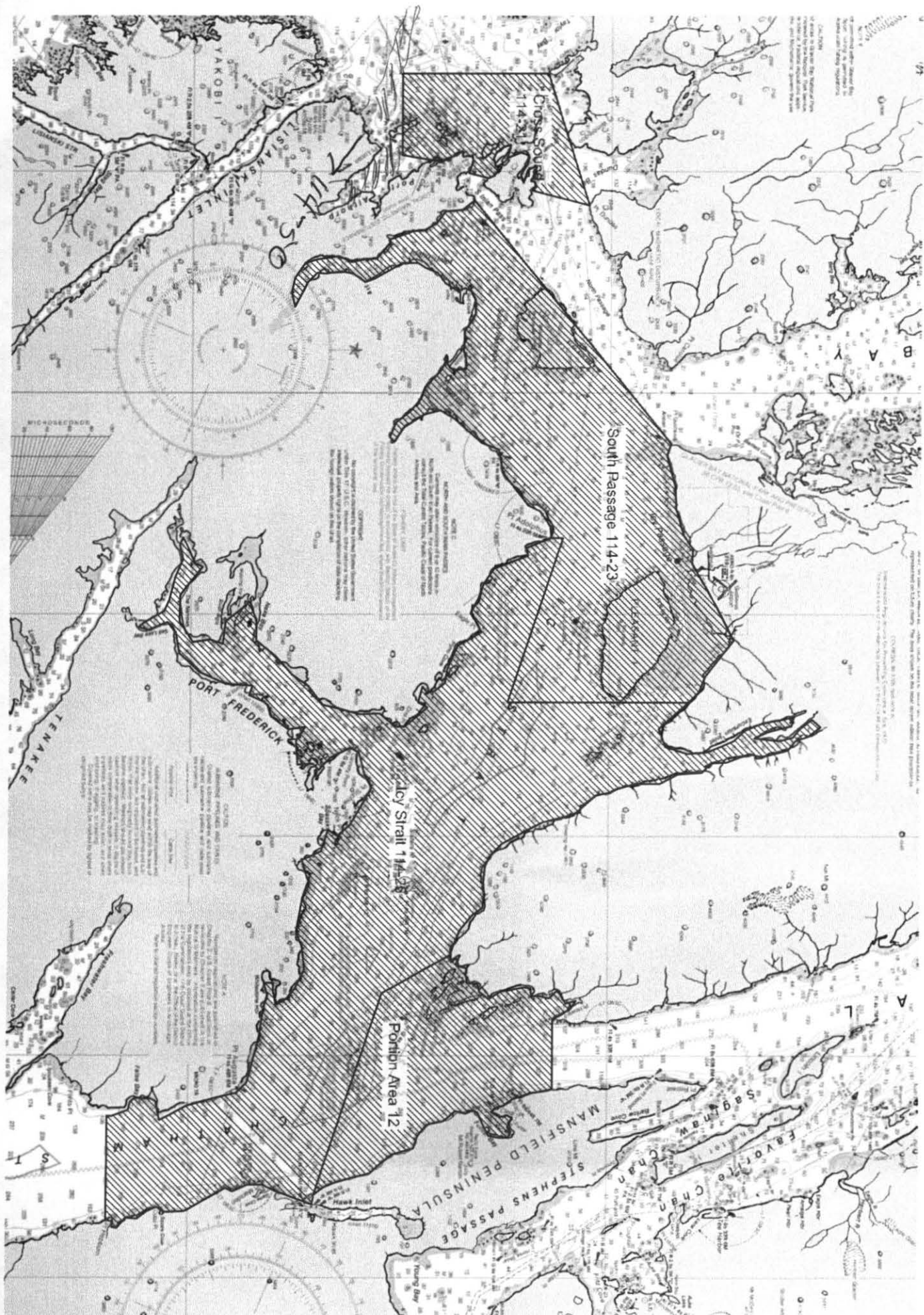
B. Who is likely to suffer if your solution is adopted?

If approved this proposal will move harvest rates toward allocation goals causing a slight reduction in net groups catch.

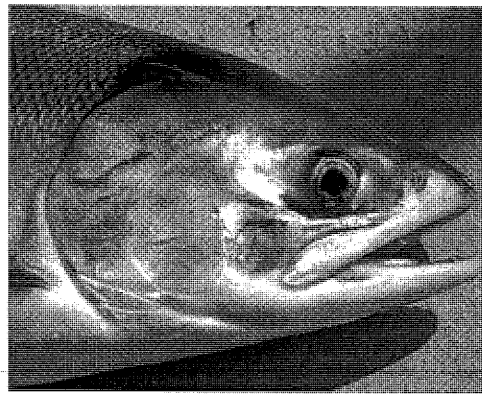
7. List any other solutions you considered and why you rejected them.

We developed and brought 22 ideas to improve troll harvest share of SE enhanced salmon to the December 2009 Joint Regional Planning Team. Based on feedback from other groups we honed those ideas down to less than 10 in the winter of 2010. They included ideas such as chum trolling in parts of 15 and all of 12 in June.

We thought about proposing that SE hatchery operators and Joint Regional Planning Team be directed by the BOF to prepare and submit individual and regional plans for bringing trollers within their allocation as soon as possible. In March of 2011, after hearing from numerous individuals, groups, ADF&G personnel, and our membership, we decided to submit this proposal for June and another for July.



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094
February 6, 2012



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BOARDS

Dear Chairman Johnstone and Board members,

Chum Trollers Association is a group of SE trollers with slightly over 100 paid members that organized in the fall of 2009. We organized to inform and provide a voice for an ever growing proportion of the troll fleet choosing to target hatchery chums, the most successful salmon hatchery species in SE Alaska. Shortly after organizing we adopted this mission statement: "To promote and improve Alaska chum salmon harvest for all trollers."

The History, why 325 and 326 are before you.

Trollers are chronically short of their allocated share of SE enhanced salmon harvest value which is 27-32%. We have averaged 19% since 1994. The difference between our harvest value and our allocated value over the years is tens of millions dollars. The difference in 2011 alone is about four million dollars.

We responded to this challenge by developing 19 ideas for improving trollers' share. We brought these ideas to the SE Joint Regional Salmon Enhancement Planning Team (JRPT) in December of 2009. (Attached) Our thought was that the JRPT would direct SE hatchery operators to develop a coordinated plan to bring trollers within their allocated share. That idea did not gain traction. JRPT and gear group leaders unofficially advised chum troll representatives to develop specific plans in co-operation with other gear groups and individual hatchery operators to improve access to enhanced chums, particularly in areas already open to trolling, such as Icy Straits and Behm Canal.

We have responded to this direction by doing just as advised under this guiding principle:

As a long term policy chum trollers would rather not see salmon taken from one or another gear group but rather the creation of new opportunities for the troll fleet. In the short term, however, every effort should be made to share existing hatchery sites (production) as equitably as possible. We must be assured of our share of the pie (on the table) while the other one is in the oven.

The success of our efforts and chum troll advocates on the SSRAA Board have resulted in record chum troll harvests in 2011 but still leave trollers approximately four million dollars short of our allocated share. Our rejuvenation of the Icy Strait/Cross Sound round pink and chum troll fishery resulted in over a million dollars' worth of chum troll harvest in 2011 and made 3 things clear to us:

- i) that we needed a hatchery chum troll management plan in Icy Straits; and ,
- ii) there was likely good chum troll opportunity in June on the Admiralty shore; and,
- iii) there was likely good chum troll opportunity in 11A.

We responded to these challenges by proposing 325 and 326.

We whittled down 19 ideas to two proposals in a year and a half.

The Problem: The status quo is unacceptable.

- Trollers are millions of dollars behind their allocated share of SE enhanced salmon and are projected to remain well short without your action.
- Since the June hatchery chum troll fishery is expanding in Icy Straits under Chinook hatchery harvest management it is important for both the directed Chinook and chum troll fisheries to work under respective hatchery harvest management plans.
- CTA believes it is ridiculous to be managing Icy Straits solely for Alaska hatchery Chinook when the vast majority of troll effort is targeting hatchery chums and catching over 600 chums per Chinook.

The Solution: The top 10 reasons why 325 is good for Alaska.

- 10) Will increase opportunities for local trollers residing in Juneau, Haines, and Hoonah, resulting in increased economic activity for local businesses and raw fish tax for these communities. Last year, during the June Icy Strait Chum Fishery, there was participation from trollers residing in communities all over SE Alaska.
- 9) Chum trolling in Icy Straits is a fuel efficient, calm water, profit generating, and family promoting fishery.
- 8) Icy Straits chum trolling disperses troll effort throughout the region for spring trolling and contributes to a longer Chinook retention season in July.
- 7) The Hawk Inlet/Funter Bay area disperses the Icy Strait troll fleet toward known availability of hatchery chums closer to the hatchery release sites.
- 6) Groups as diverse as the SE enhanced salmon Joint Regional Planning Team, Alaska Trollers Association, and several SE Fish & Game Advisory Committees have supported proposal 325 (amended).

- 5) By-catch rates are minimized in the chum troll fishery.
- 4) June Icy Strait troll caught chum are chrome brite and enhance value of chum marketing throughout the state.
- 3) 2011 ADF&G figures show Icy Strait troll chums worth over a million dollars ex/vessel. Many trollers need a profitable fishery in June to sustain them financially. With the current market conditions and hatchery production, most trollers can make more money targeting chums than Chinook in June.
- 2) Protects and improves hatchery Chinook and chum troll fisheries by giving ADF&G the flexibility to manage for hatchery chum troll harvest in these areas as well as hatchery Chinook troll harvest. (They can shape the fishery according to conservation needs, allocation, and run strength as necessary.)
- 1) The Icy Strait chum troll fishery is a great example of how the Board of Fish can promote small Alaskan businesses and eliminate outdated regulations hampering business and entrepreneurship. Goals identified by Governor Parnell in his State of the State Address last month.

During the process toward proposing needed regulatory change and preparing this letter our association has learned a great deal. We have expected some opposition and concern from some groups about our proposals and have done our best to meet with groups, answer questions, make adjustments, and research the facts on everything from Sockeye harvest by trollers in Icy Straits in June to the estimated reduction in coho harvest in 2011 because so many trollers chose to target chums. We have prepared two fact sheets (Attached) which provide a synopsis of the best information we have been able to dig up regarding concerns about our fishery and proposals.

In conclusion Chum Trollers proposed #325 because there were problems in allocation and management that needed to be addressed. Please help alleviate these problems by adopting #325 as amended.

Finally, if any more amendments need to be worked out, our representative(s) will be at the Ketchikan meeting and will be more than willing to work on details with the Board, ADF&G, and other interests.

Sincerely,

Chum Trollers Association
103 Gibson Place
Sitka, AK 99835





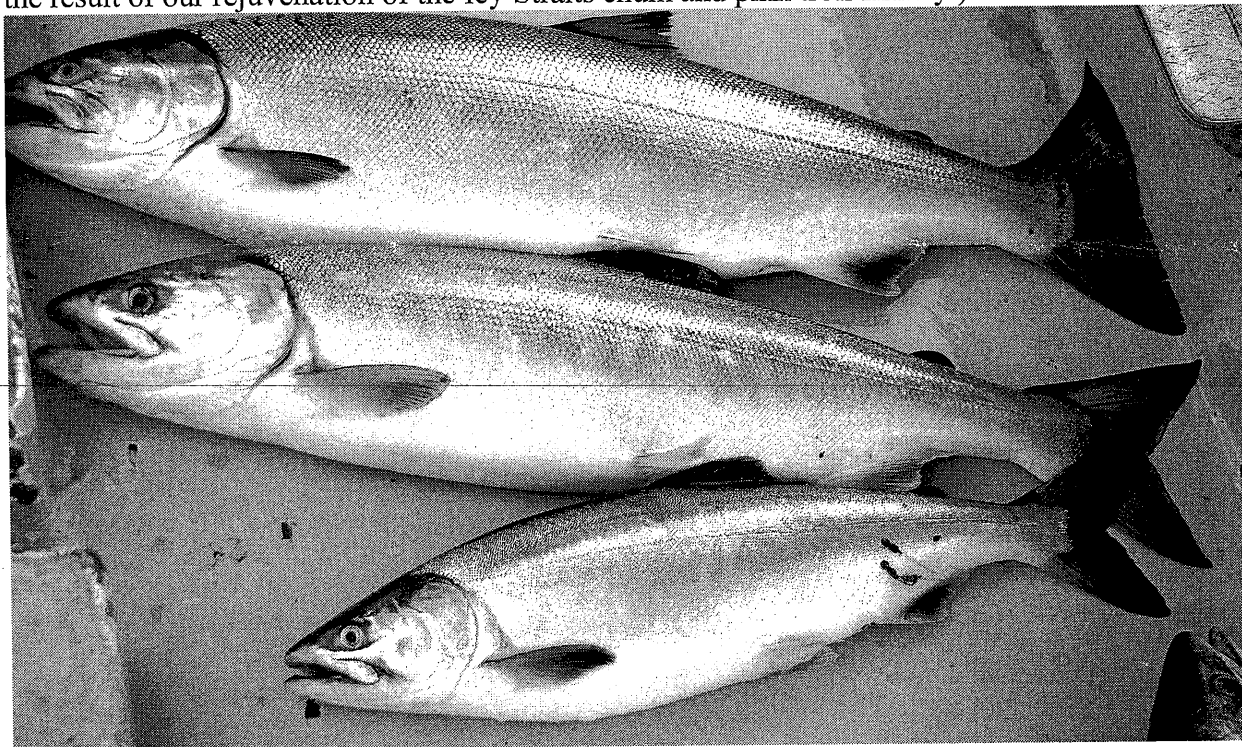
"To promote and improve Alaska chum salmon harvest for all trollers."

Nineteen ideas for moving trollers within their allocation (27-32%) of SE hatchery salmon harvest values starting in 2010. Chum Trollers do not claim credit for either originating or accomplishing these ideas but here is the status of the ideas we presented to the JRPT in Dec. of 2009. (Status of ideas in parentheses)

1. (SSRAA) Retain Chum Troll opportunity at Neets Bay. (Accomplished)
2. (NSRAA) Convert Hidden Falls (HF) stock chums released at Deep Inlet to Medevejie (MV) chums. (Dropped)
3. (NSRAA, ADF&G) Develop alternate remote release sites for MV chums, Chinook, and coho. (Cascade Creek, Crescent Harbor?) (Partially accomplished by NSRAA Board.)
4. (NSRAA) Go over Chip Blair proposal and support or propose alternative to DI re-opening plan. (Accomplished by NSRAA Board action.)
5. (NSRAA, ADF&G) Work on making sure Brood Stock closure losses to trollers in Eastern Channel are made up before CR or Net fisheries benefit from those closures. (Accomplished through NSRAA Board.)
6. (NSRAA, RPT) Invest some of NSRAA 3% in coho production at SSRAA. (Dropped)
7. (NSRAA, ADF&G) Release HF stock not working at Deep Inlet to Remote release site elsewhere and provide troll access. Replace 18 million HF stock at Deep Inlet with MV stock. (Dropped)
8. (NSRAA) Split the opening of the terminal harvest area at HF to allow trollers to target chums at either Takatz or Kanaku without interference from Cost Recovery (CR) or Seine fisheries in that sub-area until July 1. (Last Sunday in June, June 28, or until a certain % of the expected return was harvested by trollers were also discussed.) (Dropped)
9. (NSRAA) Establish viable troll coho fishery at HF by eliminating or greatly reducing cost recovery on coho at this site. (Accomplished amended with NSRAA Board and ADF&G, BOF action needed on ADF&G proposal # 343.)
10. (NSRAA, ADF&G) Develop additional remote release sites for HF and MV Chinook. (Accomplished by NSRAA Board)
11. (BOF) Open parts of District 11 to trolling for hatchery salmon. Process to draft Agenda Change Request (ACR) to the Board of Fisheries for experimental openings in 11 to find where chums/sockeye are biting and to minimize by-catch, and impact (if any) on Juneau sport fisheries. Full proposal for BOF consideration in 2012. (ACR dropped, BOF action needed on proposal #326)

12. (BOF, NSRAA) Redo lines in Deep Inlet to reduce net harvest of MV Chinook. (Proposal #344 by NSRAA, supported by industry consensus, needs BOF action)
13. (BOF) Require troll access at all SE hatchery terminal harvest areas. (Dropped)
14. ((BOF) Board of Fisheries) Shift lines in Lynn Canal for gillnet/troll areas. (Dropped)
15. (BOF) Repeal 1 chum/1 Chinook regulation in the HF terminal harvest area after July 1. (Dropped)
16. (BOF) Open Hidden Falls Stat weeks (June 10 –Aug) for trolling. (Dropped)
17. (HO, Regional Planning Team (RPT)) Request each Hatchery Operator (HO) to share the percent of the gear group harvest value of their production that is going to trollers. (Accomplished, no action needed)
18. (HO, RPT, BOF) Request each HO to explain their plan for bringing trollers up to 32% starting in 2010. (Dropped)
19. (RPT, HO) Dedicate Port Armstrong and Kake chum production to troll harvest until we are within our harvest allocation value range. (Dropped)

(Chum Trollers were advised at several meetings in late 2009 and in 2010 to explore hatchery chum harvest in areas already open to us such as Icy Straits and Behm Canal. Proposal #325 is the result of our rejuvenation of the Icy Straits chum and pink troll fishery.)



An issue that has surprised experienced chum trollers in regard to our proposals has concerned by-catch of other salmon. This has surprised us because our experience is that chum trolling is the most selective/clean fishery most of us have experienced, whether it be hook and line or net. Nevertheless the issue has persisted and we have spent a good deal of time researching the data and discussing it with other gear group members and ADF&G. Our conclusion has been to focus on the data rather than testimonials which are subjective.

2011 Directed Troll Chum salmon vs all salmon harvest ratio's					
Chum vs.	Chinook	Sockeye	Coho	Pink	
Icy Strait	633:01:00	394:01:00	81:01:00	1.2:1	harvest during spring troll fisheries
Neets/W.Behm	471:01:00	812:01:00	160:01:00	11:01	harvest during summer retention periods

Table 325– Icy Strait spring troll hatchery chum proportion 2010 and 2011.

2010				
Stat. Wk	Number Sampled	Number Marked ¹	Number No Mark	% Marked ¹
26	213	188	25	88%
27	163	152	11	93%
Grand Total	752	680	72	90%
2011				
Stat. Wk	Number Sampled	Number Marked ¹	Number No Mark	% Marked ¹
25	220	187	33	85%
26	242	205	37	85%
27	91	85	6	93%
Grand Total	553	477	76	86%

Our representatives attended the 2011 SE gillnet, seine, and JRPT meetings last December and observed that troll by-catch of any species in Icy Strait was never raised as an issue.

The data confirms that the June Icy Strait chum troll fishery is highly selective at targeting hatchery chums.

Another interesting issue that has come up in questions from sportsmen and gillnetters is what effect will chum trolling have on coho abundance in the inside waters. So, we asked ADF&G what they thought. Here is the data:

Estimated reduction in summer troll coho harvest resulting from directed chum troll effort, 2011.

Estimated reduction in summer troll coho harvest resulting from directed chum effort, 2011.									
2011 Directed Troll Chum Effort & Harvest				Regional PT Coho CPUE	Estimated Coho harvest reduction by directed chum effort				
Week	Week of	Permits Fished	Weekly harvest		5 day week	6 day week	7 day week		
27	26-Jun	129	41,582	11	7,209	8,651	10,092		
28	3-Jul	136	46,496	25	17,325	20,790	24,256		
29	10-Jul	167	131,443	32	26,868	32,241	37,615		
30	17-Jul	174	125,009	92	79,900	95,880	111,860		
31	24-Jul	140	52,235	70	48,783	58,539	68,296		
32	31-Jul	131	39,105	86	56,379	67,655	78,930		
33	7-Aug	82	11,768	76	31,211	37,453	43,696		
34	14-Aug	19	7,703	49	4,682	5,619	6,555		
35	21-Aug	42	16,319	82	17,222	20,667	24,111		
36	28-Aug	53	20,601	81	21,525	25,830	30,135		
37	4-Sep	38	10,502	74	14,045	16,853	19,662		
38	11-Sep	29	16,739	90	12,990	15,589	18,187		
39	18-Sep	6	20	89	2,671	3,205	3,739		
					340,810	408,972	477,134		

2011, Spring

Troll

District	Number
101	1,170
102	1,010
105	1,514
106	147
107	22
109	221
112	91
113	362
114	4,514
Grand Total	9,055

So, the answer to questions about the effect chum trolling has on coho abundance available to inside sport fishermen and gillnetters are *a lot*. ADF&G estimates 340,000-477,000 less coho harvested by trollers in 2011 because many were targeting chums instead. Only 9,055 coho harvested in total by trollers in June. Proposals 325 and 326 move trollers closer to the hatchery release sites where the higher chums per coho ratios are likely to be experienced.

The data shows chum trolling decreases troll coho harvest substantially.

Jan 1, 2012

Boards Support Section
PO Box 115526
Juneau, AK 99811-5526
Shannon Stone,

RECEIVED
JAN 06 2011
BOARDS

I would like to submit the following 44 pages for public comment on proposals 301, 302, and 303. If you have any questions please call me at 218-252-2337.

Thank you and have a great day!

Dan Ernhart
Tsiu River Coalition
PO Box 1403
Cordova, AK 99574
dan@ernhart.com

This is for The
Ketchikan meeting.

PROPOSAL 301, 302, 303

January 1, 2012

The information contained in this public comment is in two parts. 1. The three proposals submitted to the Board of Fisheries. These are the original copies as they were sent in. They were somewhat changed when put into the proposal book. I would like you to review the complete proposals as submitted. These will make more sense. 2. The complaint letters, pie charts, numbers sheet are to illustrate the way commercial harvesting is conducted on the Tsiu River. They will also show how it has been negatively impacting the sport fishing experience and killing local business. There are also three DVDs that have video and pictures that show how commercial harvesting is done on the Tsiu River. If anyone wants to see them please contact me for a copy.

Please keep in mind that the city of Yakutat requires all persons that wish to do business, (except for commercial harvesters), on the Tsiu River to:

- A. have a long term lease with a yearly lease payment
- B. have survey and appraisal for property used for business or pleasure
- C. have a substantial bond for clean up or abandonment (which is over \$100,000 for some lease holders)
- D. pay property taxes
- E. have a Yakutat business license

The commercial harvesters are not lease holders. They are allowed to conduct business without any of the above mentioned stipulations, with the exception of possibly a business license. All others were bound to meet the requirements A, B, C and D before a business license would be granted.

As you read the letters and look at the videos and pictures you will probably start to wonder how the city of Yakutat can force one user group (lease holders) to comply with all their demands to operate a business while allowing another user group (commercial harvesters) to come in and do business without any requirements. And, it is that same, noncompliant user group that is hurting the legitimate businesses and degrading the Alaskan experience for everyone else with their 'I don't give a hoot' attitude. It is neither fair nor right.

Thank you for your time in reviewing this matter. I strongly suggest reading through the enclosed state law pages and the letter by Dan Ernhart before the other letters and video. It will help explain what you will be seeing and reading. Please contact me with any questions or comments.

Dan Ernhart
Executive Director – Tsiu River Coalition
Po Box 1403
Cordova, AK 99574
email – dan@ernhart.com Cell - 218-252-2337

My name is Dan Ernhart. I have managed the lodge on the Tsiu River for Alaskan Wilderness Outfitting Company (AWOC) for the past 17 years. I also conduct tours and provide guide services for sports fishers.

In my experience the majority of the sport fishers who come to the Tsiu are older, affluent guests who have fished all over the world and choose our lodge as among the best. I'm told that we offer the best fishing and outdoor experiences. In fact, some of our best repeat customers say they never go to the same place twice, as there are so many options and new places to see. When customers, new and returning, first come to our lodge they are very excited to see the wildlife, mountains, rivers and to catch fish; in general enjoy and partake in the Alaskan experience.

By contrast, when the commercial harvesting operation is in motion our customers have had to witness and endure the killing of seals, the loss of trumpeter swans, bears and other wildlife as well as abusive behavior. Our customers have had commercial harvesters literally throw nets at their feet, tell them to find other places to fish and run large, noisy, powerful jet boats in circles around them. This behavior is intimidating and intrusive to people who have chosen a vacation which used to offer them breath taking beauty and tranquility.

I have seen clients on their last vacations with friends and family become degraded and demoralized by the behavior of the commercial harvesters. These are hard working folks who have spent thousands of dollars on their trip and spent many days in a journey to have an experience stolen from them that they will never get back. One commercial harvester with a total lack of regard for the law, the environment and human decency has the power to destroy another person's hard earned vacation with no recourse for the victim. All I can encourage my clients to do is move to a different spot; usually above the fish and game marker. These spots get over-crowded fast as the harvesters have intimidated other sport fishers out of their fishing holes. There have even been times when the commercial harvesters go above the marker; on those days my clients literally have nowhere else to go.

There are many laws being broken that, if were upheld, would eliminate the problems between sport fishers and harvesters such as:

- Forcing people out of their fishing holes
- Operating jet boats within 10 feet of people standing waist deep in the river
- Harvesting above the fish and game marker
- Nets stretched more than half way across the river (sometimes all the way across)
- Nets not in a predominantly straight line
- No buoys on the nets to identify them
- No Alaska (AK) numbers on the boats for identification

Commercial harvesters also degrade the environment. They are not required to hold a lease or bond and there is no recourse for the devastation they leave behind. The enclosed videos will show

abandoned atv's and trailers, rusted out fuel barrels and dilapidated cabins dotting the sand dunes of the Tsiu River. I have personally witnessed eight shacks and their contents fall into the Tsiu River and the video will show evidence of that as well.

I have tried to call in these violations, but it is difficult when I cannot identify the boats or nets that are not numbered. The representative of the Fish and Game, who is on site during the commercial harvesting season, has historically chosen to not report illegal activities, and in 2008, this individual is the brother of the fisheries manager (Gordy Woods). When I asked Mr. Woods if he takes into consideration the sport fishing element, he said the Tsiu River is only managed for commercial harvesting and that there is no sport fishing management plan in place. Mr. Woods is empowered to open commercial harvesting. In 2008 he announced 31 days of commercial harvesting openers in a 49 day period. That means that there were only seven days out of a 49 day period that were free of commercial harvesters, and fully available to our clients. The openers are from 9 am on the opener to 9 am on the day of the closure. Even though the nets are pulled at 9 am the sport fishing opportunity is very limited due to the fact there are very low numbers of fish below the marker. And all the fish above the marker have been scared to death and are stressed out. They do not bite very well. We have to wait for the next tide to see if more fish will be coming in. Then there is usually an opener the next morning at 9 am. Just when the fish are starting to fill in the emptied out holes the nets go back in and the cycle starts again.

Equally troubling is the fact that the commercial harvesting operation is under the control and management of the city and borough of Yakutat. That is, the cannery, harvesters, pilots, fish and game management, and F&G on site representative all economically tied to the local community.

Look at the numbers:

- the numbers of sport fishers increased between 2000-2004 when there was no commercial harvesting on the Tsiu and then peaked in 2005.
- the number of sport fishers decreased between 2005-2008 when commercial harvesting resumed on the Tsiu.

It's no coincidence. The way commercial harvesting is conducted on a river the size, depth and length of the Tsiu is filthy, obnoxious, dangerous, and causing people to stop coming to the Tsiu. Ultimately hurting someone's vacation, someone's employment, and someone's business. That's not right.

If you look at it from a purely economic standpoint, sport fishing on the Tsiu employs many more people, the revenue base is extremely higher and is potentially even higher, the taxes and lease payments to Yakutat is higher and potentially even higher. And the impact on the environment and the fish resource is extremely lower.

The amount of investment in both time and dollars that the lodges on the Tsiu have put into the infrastructure and building business here is enormous. The lodges all pay sales taxes, property taxes and lease payments every year. The lodges all have a huge bond on their lease sites in case of

abandonment or for clean up. The lodges all had to get a survey and appraisal done. The lodges all have business licenses.

The amount of investment in both time and dollars the commercial harvesting operation has put into infrastructure and the area pales in comparison. There are no property or sales taxes, no lease payments to make. No bonds to pay in case of abandonment or for clean up. No survey or appraisals to pay for.

AWOC spends in excess of \$100,000.00 a year on advertising and promotions. We travel all over the country working the streets to get those precious few new groups each year. AWOC has been advertising the Tsiu for 28 years and has many long time guests and employees. AWOC has seen a dramatic decline in the number of guests returning the last 5 seasons. Many long time guests have stated they will never come back as long as there is scare harvesting with motorized vehicles on the Tsiu.

I have had the question asked, "why is there all of a sudden a problem? What is different now that there are so many complaints?" There has always been a problem. 1995 was my first year on the Tsiu and even then I would get run out of my fishing holes by commercial harvesters. Ironically, it was Greg Derrick running me out. He is now a lodge owner on the Tsiu. In the 80's and 90's there was a great big lake above the marker. Plenty of area for fish and anglers to escape the activities going on down stream. Then there was no commercial harvesting between 2000-2004. During the last 17 years the lake was slowly filling in with sand blowing in during the storms. So the area we used to be able to sport fish and get away was gone and was forced to fish the main channel and the mouth of the river which was fine since there was no commercial harvesting conflict. Then when commercial harvesting resumed in 2005, there were new, young faces driving the boats. The price of salmon had fallen off, the price of fuel had risen and these young guns were aggressive. Now that our safe haven for sport fishing was gone, we were left shrugging our shoulders wondering what the heck to do. Then, in the years to follow, the number of sport fishers has dropped off so much so that we are finding our backs against the wall. There are already 2 of the 5 lodges for sale on the Tsiu. And 2 others have turned into ghost towns. It's getting ugly. The Tsiu River employs me year around. This is the way of life I have chosen. I have spent most of my adult life building, developing and turning this lodge into one of the greatest sport fishing destinations in Alaska. That is becoming endangered. Endangered because of a few boats and a handful of young guys that like to hang out and have fun on the Tsiu? It really is ridiculous when you think of the possibilities and potential this river and area has for tourism. People will simply spend their money somewhere else where they don't feel disgusted and mad when they leave. Tourists should feel welcome and leave here wanting to tell everyone about their adventure, what they did, the animals they saw and feeling a sense of the great Alaska outdoors.

The Tsiu River has seen tremendous changes in the last 17 years. Physically, socially and economically.

- The waterway of the fishery has physically changed. (The lake above the F&G marker that was once a safe haven for both fish and sport fishers is gone. Filled in with sand from storms. That means over half of the usable waterway has vanished. So now the scare tactics of harvesting with powered boats are moving the fish out of reach of sport fishers.)
- The state of Alaska opened up the area in 1997 to permitting for long term leases. (before 1997 it was yearly leases and temporary tent camps only. Commercial harvesters were allowed stick frame buildings without permits or leases; sport fish operations were not.)
- The number of users in each user group has changed (Sport fishers have sky rocketed, commercial harvesters have dwindled to almost nothing, and at times, completely disappeared)
- In 2004 the state of Alaska transferred ownership of the land of the Tsiu area to the city of Yakutat.
- The economic value from the different user groups of the fishery has changed.

The fisheries management needs to catch up with what is going on today.

We are interested in:

1. stopping the scare tactics with powered boats that the commercial harvesters use.
2. change the commercial harvesting boundaries.
3. change the way the Tsiu fish are counted.
4. bring all persons wishing to do business on the Tsiu River up to date with Yakutat's permit and leasing requirements.

We believe that by stopping the powered boat scare tactics, and have all businesses become current with the city of Yakutat regulations, it will virtually eliminate all illegal activity currently taking place as seen on the videos and the complaint letters. Plus, make it a much safer and enjoyable environment for all user groups. Look at these laws:

5 AAC 39.290. Closed waters

_(a) Commercial fishing for salmon is prohibited at all times within the streams and rivers of Alaska and within 500 yards of any salmon stream or over the beds or channels of streams and rivers of Alaska at all stages of the tide or as specified in regulations having particular application to designated streams or areas. The restrictions in this subsection do not apply in the Kodiak Area

_(d) The Ugashik, Yukon and Kuskokwim Rivers, the Yakutat Area and any other river where a legal commercial fishery now exists are the only exceptions to this closure.

5 AAC 75.060. Molesting of fish

_Molesting or impeding spawning or the natural movement of fish contrary to the lawful methods and means of sport fishing is prohibited.

5 AAC 92.080. Unlawful methods of taking game; exceptions

_The following methods of taking game are prohibited:___

_(5) except as otherwise specified, with the use of a motorized vehicle to harass game or for the purpose of driving, herding, or molesting game;

5 AAC 39.190. Driving salmon prohibited

It is unlawful to drive or attempt to drive salmon from waters closed to salmon fishing.

§ 05.25.060. Prohibited operation

A person may not operate a boat on water of the state_

(1) for a recreational purpose or another purpose, in a reckless or negligent manner so as to endanger the life or property of another person

The Ugashik, Yukon, Kuskokwim and Situk rivers are extremely large bodies of waters compared to the Tsiu River. The Tsiu River, with its average depth below 2 feet, is not a suitable river for scare harvesting with any powered boats.

Our argument is:

- The scare tactics used by powered boats: molest, impede spawning and the natural movement of fish, put an undue amount of stress on the fish and scare them out of reach of all user groups by pushing them upriver into unfishable waters.
- The danger factor: people standing in the water in this very narrow river with large, high powered, flat bottom jet boats zig zagging on the edge of being out of control.
- The amount of stress: it puts on consumers trying to sport fish and enjoy the great Alaskan outdoors.

When the decision was made to manage the Tsiu River for commercial harvesting only was probably because there was no sport fishing going on there at the time. But now the Tsiu River has become a hugely popular, worldwide sport fishing destination and the laws and management should be updated to protect the river and take into account the changes that have happened in the last 17 years.

One final thought from the Fish and Game code:

Sec. 16.05.092. Fisheries rehabilitation, enhancement, and development.

The department shall

(1) develop and continually maintain a comprehensive, coordinated state plan for the orderly present and long-range rehabilitation, enhancement, and development of all aspects of the state's fisheries for the perpetual use, benefit, and enjoyment of all citizens and revise and update this plan annually;

(2) encourage the investment by private enterprise in the technological development and economic utilization of the fisheries resources;

The Tsiu River is not just another river in the middle of nowhere. It really is a world-class, worldwide destination for sport fishing silver salmon. There is nowhere else in the world a person can go and catch the numbers and size of silver salmon day after day, year after year, consistently. This place is as special as it gets. It is one of a kind, and should be treated that way. Not like an empty beer can tossed on the beach.

Dan Ernhart

Tsiu River Coalition

email - dan@ernhart.com

PO Box 1403

Cordova, AK 99574

218-252-2337

(a) Except as provided in (e) of this section, a person may not intentionally obstruct or hinder another person's lawful hunting, fishing, trapping, or viewing of fish or game by

(1) placing one's self in a location in which human presence may alter the

(A) behavior of the fish or game that another person is attempting to take or view; or

(B) feasibility of taking or viewing fish or game by another person; or

(2) creating a visual, aural, olfactory, or physical stimulus in order to alter the behavior of the fish or game that another person is attempting to take or view.

(b) For purposes of (a) of this section, "lawful" means

(1) in compliance with

(A) this title, regulations adopted under this title, or applicable federal statutes and regulations;

(B) the Marine Mammal Protection Act (P.L. 92-522) or the Endangered Species Act (P.L. 93-205); or

(C) federal regulations adopted under 16 U.S.C. 3111 - 3126 relating to subsistence hunting, fishing, or trapping on federal land; and

(2) with the permission of the private landowner if the hunting, fishing, trapping, or viewing of fish or game occurs on private land.

(c) Notwithstanding AS 12.25, only a peace officer may arrest a person for violating this section. A peace officer who has probable cause to believe that a person has violated this section may arrest or cite the person or order the person to desist.

(d) In a prosecution under this section, it is an affirmative defense that the person was lawfully entitled to obstruct or hinder the hunting, fishing, trapping, or viewing of fish or game.

(e) This section does not apply to

(1) lawful competitive practices among persons engaged in lawful hunting, fishing, or trapping;

(2) actions taken on private property with the consent of the owner; or

(3) the obstruction or hindrance of the viewing of fish or game by a person actively engaged in lawful fishing, hunting, or trapping.

(f) A person who violates this section is guilty of a misdemeanor and is punishable by a fine of not more than \$500 or imprisonment for not more than 30 days, or both.

Sec. 16.05.791. Civil remedies for violation of AS 16.05.790.

(a) A person aggrieved by conduct or threatened conduct in violation of AS 16.05.790 may petition a superior court to enjoin the respondent from engaging in the conduct.

(b) A person aggrieved by a violation of AS 16.05.790 is entitled to recover general damages and special damages, including license and permit fees, travel costs, guide-outfitting fees, costs for special equipment and supplies, and other related expenses.

(c) A court may award punitive damages in addition to the damages set out in (b) of this section.

It is illegal to drive fish from closed waters.

5 AAC 39.190. Driving salmon prohibited.

It is unlawful to drive or attempt to drive salmon from waters closed to salmon fishing.

1. Most rivers are closed to commercial fishing. But Yakutat area is an exception.

5 AAC 39.290. Closed waters.

_(a) Commercial fishing for salmon is prohibited at all times within the streams and rivers of Alaska and within 500 yards of any salmon stream or over the beds or channels of streams and rivers of Alaska at all stages of the tide or as specified in regulations having particular application to designated streams or areas. The restrictions in this subsection do not apply in the Kodiak Area(d) The Ugashik, Yukon and Kuskokwim Rivers, the Yakutat Area and any other river where a legal commercial fishery now exists are the only exceptions to this closure.

2. The Tsiu is specifically open up to 1/2 mile below Duck Camp Island.

5 AAC 30.350. Closed waters.

_(a) Salmon may not be taken in the following waters: _

(12) Tsiu River: upstream of ADF&G regulatory markers located approximately one-half mile downstream from Duck Camp Island.

3. Gillnets are legal.

5 AAC 30.331. Gillnet specifications and operations.

(A) Tsiu River, one net not to exceed 15 fathoms;(90 feet)

4. Gillnets may not be less than 75 yards apart or cover more than 1/2 river

5 AAC 30.335. Minimum distance between units of gear.

_No part of a set gillnet may be set or operated within 100 yards of any part of another set gillnet, except that in the Tsiu and East Rivers, no part of a set gillnet may be set or operated within 75 yards of any part of another gillnet.....

Set gillnets may not obstruct more than two-thirds of any salmon migratory waterway, except in the Tsiu River, where set gillnets may not obstruct more than one-half of the waterway.

5. For game, it is illegal to herd

5 AAC 92.080. Unlawful methods of taking game; exceptions.

_The following methods of taking game are prohibited: _

_(5) except as otherwise specified, with the use of a motorized vehicle to harass game or for the purpose of driving, herding, or molesting game;

6. And the sportfish regs have a prohibition on molesting fish.

5 AAC 75.060. Molesting of fish.

_Molesting or impeding spawning or the natural movement of fish contrary to the lawful methods and means of sport fishing is prohibited.

§ 05.25.060. Prohibited operation

_A person may not operate a boat on water of the state _

(1) for a recreational purpose or another purpose, in a reckless or negligent manner so as to endanger the life or property of another person

_SLA 1961, ch. 63, § 3; SLA 1976, ch. 60, § 1; SLA 1982, ch. 117, § 3; SLA 2000, ch. 28, § 13.

18 AAC 34.105. Handling. (a) A PROCESSOR shall inspect SEAFOOD products and FOOD INGREDIENTS to assure that they are WHOLESOME, and that they are not misbranded or adulterated. Only WHOLESOME and unadulterated products may be processed. Records of the condition of incoming SEAFOOD products must be retained for the time specified in 18 AAC 34.920(b).

(b) A PROCESSOR shall identify, by label or otherwise, and segregate SEAFOOD caught while sport fishing, subsistence fishing, or personal use fishing from commercially-caught SEAFOOD during all aspects of PROCESSING.

(c) A PROCESSOR who handles, stores, or transports SEAFOOD products shall do so under conditions that prevent product contamination and deterioration of the product and the product CONTAINER. The PROCESSOR shall hold SEAFOOD products upon receipt at a temperature of not more than 45° Fahrenheit until PROCESSING of the SEAFOOD product begins.

(d) Vessels or vehicles, including TENDERS, used to transport raw SEAFOOD products must provide ADEQUATE ice or other temperature control and ADEQUATE protection against bird droppings and sun when holding or transporting SEAFOOD products.

Sec. 16.05.831. Waste of salmon.

(a) A person may not waste salmon intentionally, knowingly, or with reckless disregard for the consequences. In this section, "waste" means the failure to utilize the majority of the carcass, excluding viscera and sex parts, of a salmon intended for

(1) sale to a commercial buyer or processor;

(2) consumption by humans or domesticated animals; or

(3) scientific, educational, or display purposes.

(b) The commissioner, upon request, may authorize other uses of salmon that would be consistent with maximum and wise use of the resource.

(c) A person who violates this section or a regulation adopted under it is punishable by a fine of not more than \$10,000, or by imprisonment for not more than six months, or by both. In addition, a person who violates this section is subject to a civil action by the state for the cost of replacing the salmon wasted.

1999-2009

The average 10 year coho setnet catch in Yakutat is 147861

The average 10 year coho setnet tsiu catch is 29743

The 10 yr average tsiu coho catch is 20% of all Yakutat

The 10 yr avg for all setnet salmon in Yakutat is 331068

The 10 yr avg of tsiu coho catch is 9% of all set net salmon in yakutat

The 2008 tsiu setnet catch is 49212

The 2008 tsiu catch is 65% above average

The 2008 tsiu fish tax revenue is thus 65% above average

The 10 year average catch is 40% lower than 2008

The 10 yr avg fish tax at 40% lower than 2008 is \$7200 (estimate)

In 2008 \$3,370,000 was generated in salmon sales in yakutat

5% of that came from com fish tsiu cohos \$168,500

2008 catch was 65% above average

The 10 yr average com fish TOTAL revenue is \$102,121 (estimate)

The 2007 sportfish property tax and lease ONLY revenue is \$101500

In 2007 only about 60% of the beds were used at lodges

The 10 year average sport fish harvest is 2293

The 10 year average total harvest for both groups is 32036

Total average tax and lease revenue from tsiu is(com+sport) \$108700 (estimate)

Sport fishers take 8% of total harvest to generate 93.4% of the tax revenue

Com fish take 92% of the total harvest to generate 6.6% of tax revenue

In 2007 bed tax and sales tax for sport fishing is \$65,500

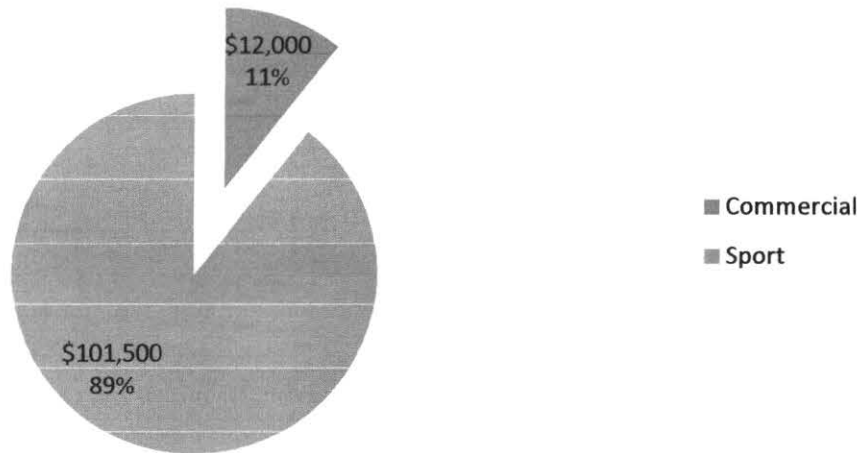
With only 60% of beds being used, the amount of tax revenue from sport fishing could potentially go up 25-30%. Which would equal another \$17,000-20,000. Just in taxes!

There is not a lot of upside to com fish tax revenue or total revenue.

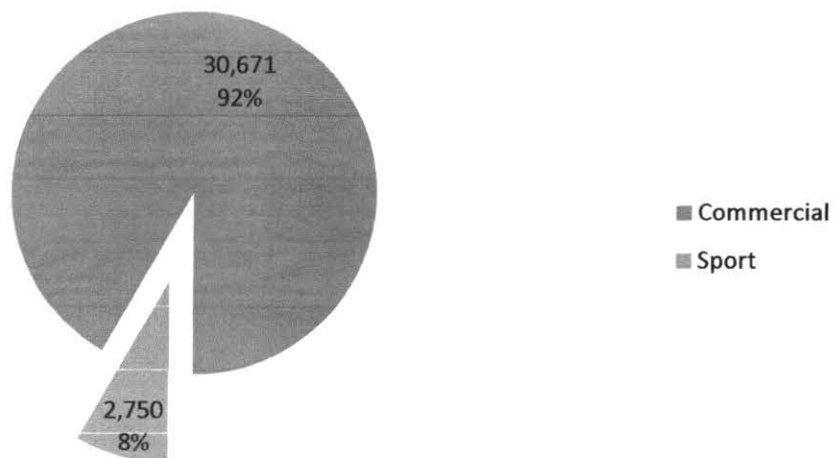
I wish I had the total revenue amount for sportfishing. It has got to be well over 1 million. The people of the state and local communities would be better served with this river increasing its sports fishing presence and decreasing the com fish presence.

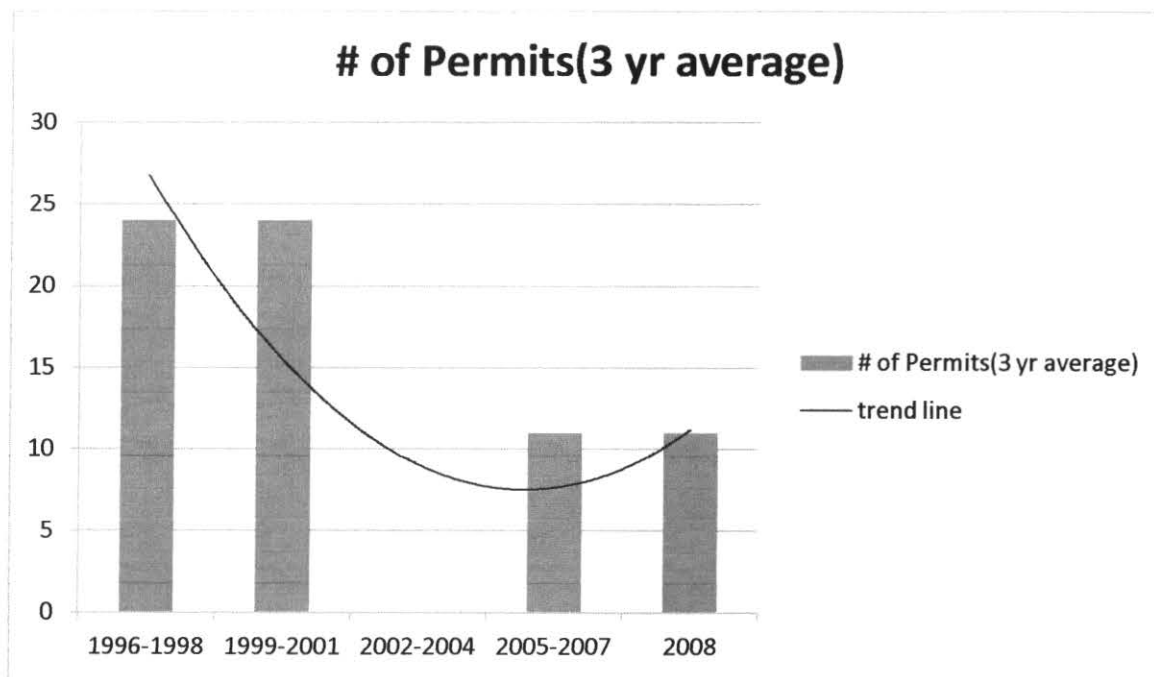
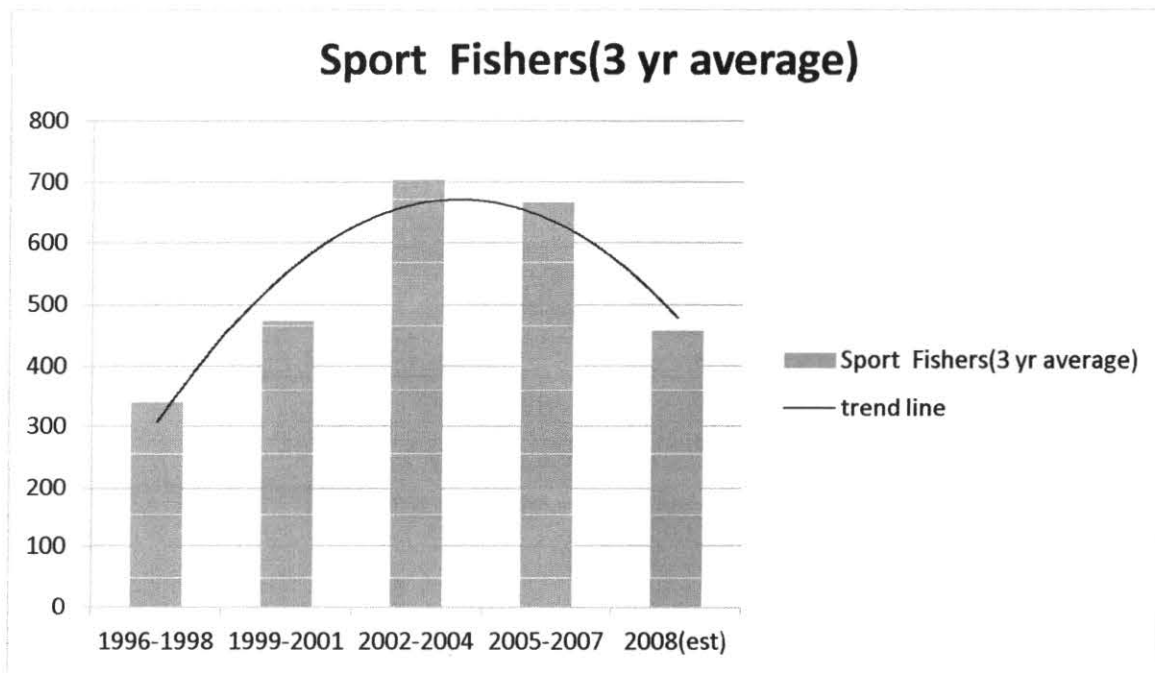
Tsiu River revenue and use as documented by
Sheinberg Associates Executive Summary Feb 2009

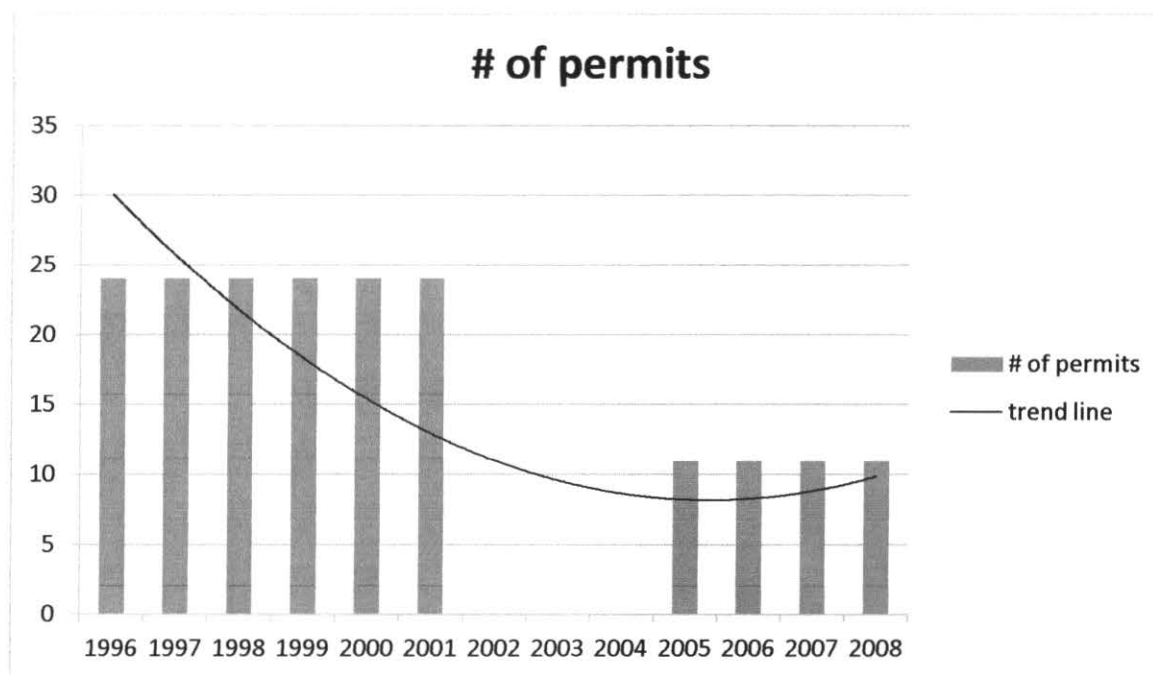
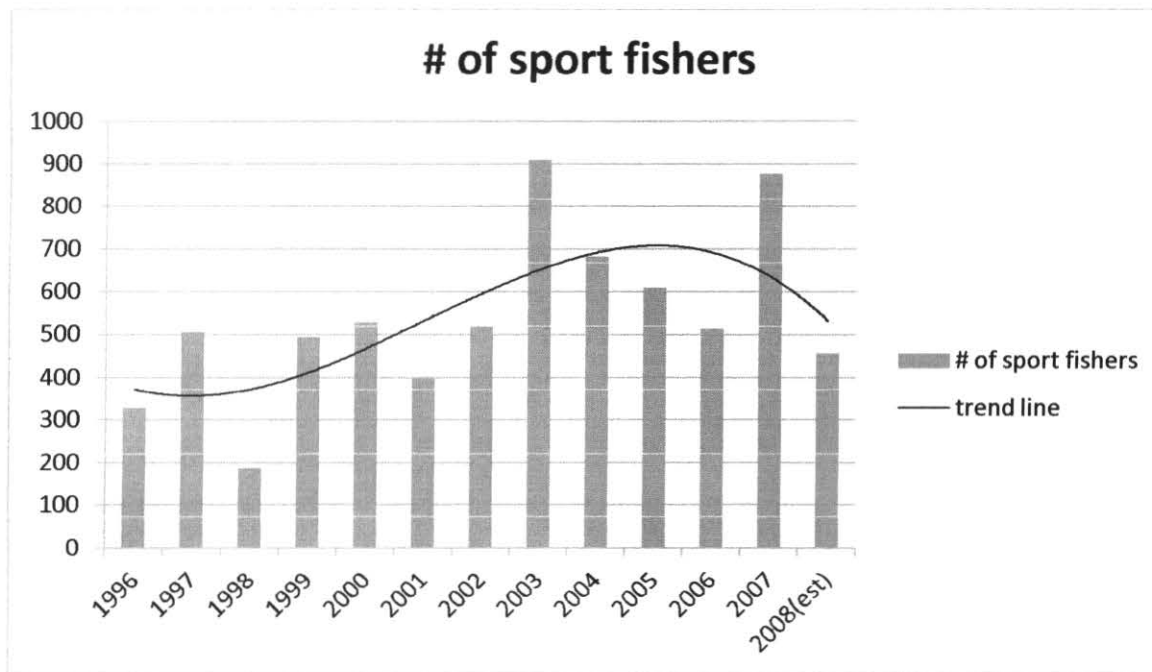
2007 Tax and Lease Revenue



2007 Number of Fish Harvested







To Whom it May Concern:

I wanted to take this opportunity to express my thoughts about the commercial harvesting of salmon on the Tsiu River in Alaska.

I have been putting together groups of fly fishermen and taking them to various fishing destinations since the early 1980s. I have been bringing such groups to the Tsiu River since 1987. I have continued to bring groups to the Tsiu because this trip has consistently offered excellent accommodations and food, friendly and helpful service, and excellent salmon fishing. But during the last three years in particular the salmon fishing experience has deteriorated badly, primarily because of the commercial fishing operations allowed to exist on the river.

On my trips north I have been allowed to bring as many as 12 anglers to the AWOC lodge. On some years I have had to turn people away. I have almost always had at least 10 people—mostly repeat customers each of whom spends upward to \$4000 to make this Alaskan trip. Last year I had only 8 people and 4 of them averaged catching only one salmon per day. Two were virtually skunked. A few years ago that would have been unheard of on the Tsiu. These men have all looked upon this trip as an annual get together. Next year none of the four will be returning. For the first time, I am having trouble recruiting anglers to come to Alaska. The current commercial fishing practices on the Tsiu are killing off that river for sport fishermen.

There seem to be more commercial fishermen on the Tsiu than ever before—now occupying virtually every spot where fresh-run salmon hold. These commercial fishermen repeatedly circle boats to herd and harass the salmon with utter disregard for any sport fishermen there. In the photographs I have enclosed, the commercial fishermen circled their boat so closely that my angling friends had to let their lines sink to the bottom to keep them from being cut by the boats.

We are told that nets can only be stretched halfway across the river. Yet I have seen places where less than 6 inches of water flowed over a wide sand bar. That shallow area is treated as "half the river", the net being stretched over the entire remaining water the only water the salmon could move through.

These commercial fishermen are so efficient at harvesting the salmon that we now have trouble catching fish on the day following the harvesting. If there are no fresh fish coming into the river on those days, there are few fresh fish left in the river. It has never been this bad.

I have heard rumors that game wardens were alerted and visited the commercial operation last season. If so, I suspect the commercial fishermen were tipped off. Perhaps the wardens were looking out for their commercial-fishing neighbors. At any rate, when we arrived, the wardens had gone and the abuses were, if anything, worse than ever.

As disturbing as this is, I am just as disturbed by the complete disregard these particular commercial fishermen have for the salmon fishery itself. They really have a short sighted view. Over the last 60 years I have seen the salmon runs in California diminish, and now am beginning to see the same type of events converge on Alaska salmon runs. Over 60 years of fishing has taught me that we can no longer treat salmon runs as if they will always be there. Unlike California, fisheries management people need to step in actively *while* such runs still exist. These commercial practices on the Tsiu need to be seriously monitored and altered and violations emphatically enforced, if not for the balance with sport fishing, at least for the future of the salmon runs.

Sincerely yours, Alvin R. Kyte Fishing Author and Teacher

my wife and family hve been fishing the Tsiu for the past 8 years. Some years have been better than others, but we always have had a good trip.

The past 2 years we have had to put up with the commercial fisherman, they have no respect for the sport fisherman. Two years ago they raced their boat out to the mouth of the river fouling up all the lines in the water. and last year they took just about all the fishable water with their nets, so on those days the sport fisherman were froze out. I would like to add that for us to come to Alaska to participate in your wonderful fishing, that we spend almost 5 thousand dollars per guest for air fare, lodging, license, etc. In closing I can't see Alaska Fish and game making a small stream like the Tsiu a stream for the commercial fisherman.

Arthur and Donna Alger 3937 Chaboya Road San Jose California 95147

I was one of the group of five fishing on the Tsiu the morning of Sept 17th. We were fishing on a small strip of dry land across from where the planes land and near the north boundary for commercial fishing. Around 9:30 or so a boat landed down stream from where I was and they started setting a net right in front of Tom Moe, one of our group, while he was trying to land a fish. There was no courtesy shown and no conversation between our guide and the commercial fisherman. We were made to feel as if we were trespassing on their private property. This was our last day of fishing and as with most trips the last day is the one that carries alot of the memories, in this case it definitaly left a black mark on the trip.

We've been coming to Alaska for the past ten years and I have to say this is the first time that I've been run off by commercial fisherman. It would be disappointing to think that we would have to deal with this every time we came to Alaska to fish. There is room for both sport and commercial if a small amount of courtesy could be shown. Earlier in the week a commercial set a net near us and held off on driving the fish into the net until we moved. That worked and everyone was happy.

I've attached several pictures showing my fly line and the boat driving the fish. I didn't get a picture of the boundary but he started driving the fish just on the north side of the line. Anything you can do would be very much appreciated. If you need anything else please let me know.

Sincerely, Art Morrison Office 800-929-7188 ext 201 Cell 253-208-5390 e-mail artm@artmorrison.com

October 30, 2008

I have brought two groups of family and friends to the Tsiu River to experience the fabulous scenery, excellent accommodations and service that AWOC provides as well as the exciting salmon fishing. Our first trip was in late September 2006 and once again in late September 2007. These trips were very special for us and we still talk about the fabulous experiences they were.

During both trips we were surprised at the brazen attitude of the commercial salmon fishermen. I respect their right to have access to the salmon but do not support their actions when they put recreational fishermen in danger. I have spent a good sum of money to take my family and friends to the Tsiu and am extremely disappointed by the unprofessional actions of the commercial fishermen and clear lack of supervision of their daily activities.

There has never been a day of fishing on the Tsiu that we did not have to quickly reel in and get to the shore area because some half wit commercial fishermen was blasting directly towards our positions which we had been fishing in for sometime. This would happen several times a day as well know. It was obvious they intentionally came all the way across the river to harass us. I have even had occasions when I could not get to the side of the river fast enough and they would speed up stream between me and the river bank missing me by less than 30 feet! It was clear to me that the commercial fishermen believe this is their river and we recreational fishermen are trespassing.

Alaska affords the fishermen such unforgettable experiences but being run over by an out of control commercial fishermen on the Tsiu is not one I want to remember.

I do hope the authorities can provide some resolution to the Tsiu fishing conflicts between recreational and commercial fishermen before someone is run down or the commercial activities escalate to the point that we recreational fishermen stop coming to such a special part of Alaska.

Sincerely Bill McKemy Reno, NV.

Blog posted on internet Posted by [John Mancuso](#) on 2006-09-18 20:19:39

I just returned from a week long trip to the Tsiu in Alaska and was really upset over the amount of commercial fishing that is going on this year. Attached is a letter I sent to the commissioner of Alaska Fish and Game. I urge anyone who has had the pleasure to enjoy this wonderful fishery to contact the Alaska Fish and Game with their comments on this issue. Maybe with enough input, they will do something about the number permits and/or days allowed netting.

To the Commissioner of FishGame@FishGame.state.ak.us

I have just returned from a fishing trip on the Tsiu River, located between Cordova & Yakutat. This was our sixth trip there for silver salmon, for myself & two friends. I would like to plan a fishing trip for six to Diericks Lodge, for 2007, but I am concerned due to the extensive amount of commercial netting I witnessed this year on this magnificent river. Last year there was minimal amount of netting, but this year it seems that the netting has doubled or more. Talking to the owner of the lodge, it is apparent that the netters are allowed twenty-four hours on and twenty-four hours off of salmon netting. This involves blocking off two-thirds of the river, in prime water, with each net. It is almost impossible for any fish to pass and spawn. We tried to go above the nets and fish for salmon, but there wasn't any in the upper reaches of the river due to the extreme salmon netting pressure. It seems that three lodges have to fish in one area near the mouth below the last net. But due to the netters swerving back and forth in their boats to push the fish to the nets, this creates extreme muddiness down below. They didn't even care that we were at a certain stretch of river first, but just implemented their nets right above us and ran boats back and forth to push the salmon into the nets. I'm sure that since this is a four year salmon, that there will be a very small run in 2010.

I hope the Fish and Game will not let this situation continue, as this will certainly ruin the sport fishing possibilities and future runs on this magnificent river.

I would like the Alaska Fish and Game to look into this matter and see if anything can be done about the amount of commercial netting or amount of days that will be allowed.

I would appreciate a response to this letter.

Thank you very much, James Mancuso GregorJim@aol.com

Feb 12, 2009

Dan-I would like to add my comments as well hoping you will have a chance to pass them along to the appropriate parties. We did not return to the Tsiu River Lodge last fall due to the problems I experienced with a commercial fisherman running his boat next to shore where I was fishing. He ran down stream within 10 feet of shore even though the river was 100-150 feet wide at that point. In doing so he came within one foot of running me down and then turned as he passed by and started laughing. If I were to return to Alaska and the Tsiu it would only be if I was heavily armed in order to protect myself from another occurrence like this. It is very unfortunate that there are very few fisheries left in Alaska that even come close to the Tsiu but the Tsiu is being ruined for the recreational fisherman by the commercial fisheries.

Bruce Bosch

November 19, 2008 Alaska Department of Fish and Wildlife

Dear Sirs:

I have fished the Tsiu River for the past four years as a guest of the Alaskan Wilderness Outfitting Company based in Cordova. Five to six of us come up from Oregon for the wonderful fly fishing for Coho salmon that the Tsiu River has to offer. We have had a great time each year with the exception of having to deal with the commercial fishermen who "work" the river with their nets for the Coho.

Two years ago, we had been fishing a stretch of the river not too far up from the mouth when the commercial fishermen came in and put their nets below us and then proceeded to go round and round with their boat to herd the fish into their nets. They then went up stream from us and proceeded to walk down the middle of the river aslapping the water surface with long poles, thus driving the fish downriver back to their nets. The river at that point is narrow enough that they were only about three rod lengths (about 30 feet) from where we were standing and fishing. We were all disgusted with this and one of our guys yelled to the commercial fisher that he was ruining our "water". And the reply was something to the effect that he had to make a living. We told our guide that we wanted to go somewhere else to fish since our spot had be totally ruined.

This past season (September 2008), we had gotten into a great fishing spot by 8:00am and had been fishing for over an hour when the commercial guys came up on the opposite side of the river, put up their nets just below where we were fishing and then went roaring up the river with their boat coming quite close to several of the fishermen. Needless to say, the upstream movement of the fish to where we were fishing was severely restricted.

We enjoy fishing the Tsiu River because of the relative remoteness of the area, the great fishing and the wonderful hospitality of the Alaskan Wilderness Outfitting Company. We also see fishermen from other guide camps on the river but have never had any conflicts. There is plenty of river for the sportsman fisher. However, it is really distressing to have this serene situation ruined by several commercial fishermen who are bent on getting their harvest regardless of what others are doing.

Sincerely, Bruce L Wulf 656 Lamplighter Circle SE Salem, Oregon 97302

November 1, 2008 To Whom It May Concern:

With the exception of one year, I have, since 1998, had the pleasure of fishing on the Tsiu River as a guest at the camp of the Alaskan Wilderness Outfitters Company in either August or September. Each trip was unique. The setting is beautiful beyond words as has been the abundant supply of incoming Silver salmon.

Only one feature has prevented the experience from being perfect. That has been the bad manners, rudeness, and illegal activities of some of the commercial fishermen. Each time that I have fished on the river at the same time as the commercial fishermen, some of them, not all, have used their boats to interrupt me and others while we were fishing a school of fish. They would run and circle their boats between us and the school of fish so as to herd the school into their nets. Many times, they have done so without regard for our fishing and our safety.

At the times I and others have called out to them, they expressed their rudeness by saying such things as "I'm just making a living", "This is my income", or "F..... you". This past September a woman was fishing about 15 yards to my left. There was a school of fish between her and the opposite bank. A commercial fisherman raced between her and fish and commenced circling in front of her and herding the fish to his net. In doing so, he came dangerously close to her. When she called out to him, he responded holding up to her his middle finger.

I don't begrudge the commercial fishermen their right to fish or to make a living. However, they should do without infringing upon the rights of others and without violating the law. Greater enforcement of the fishing regulations is needed. Without vigorous enforcement, those commercial fishermen who have behaved badly and have violated the law will continue to behave badly and violate the law.



Respectfully, C. Allen Pool

—
This past September tenth through the fourteenth completed my fifteenth consecutive trip to the Tsiu River, Alaska. It was my worst fishing experience here or anywhere!

Several years ago was my first experience observing commercial fishing operations on the river. There was a mutual respect between the commercial fishermen and the anglers. During my break period, I had the opportunity to talk to some of the commercial fisherman, some of whom were hard working husbands and wives, trying to make a living. They gained my deepest respect. Some of them apologized to us for their activities but they operated within the law.

However, in recent years there has been an increase in the violations of accepted legal commercial fishing practices.

1. The illegal practice of herding fish into the nets by spinning their boats and forcing the fish into the nets versus the natural captivity of fish swimming into the nets was most disturbing. The bow man was tauntingly laughing and waving to us. The aural effect of the boat motors were also altering the natural behavior of the fish.
 2. Nets were anchored more than halfway across the river. This year some were placed 90% across the river and later reversed to cover the remaining 10%. This was done in front of a line of anglers. A net anchor was dropped haughtily at the feet of one of our guides.
 3. One of the boats circled within ten feet of shore in front of me and ran over my fly line. He continued to harass the anglers by obstructing our casting and herding the salmon into the nets.
 4. Miraculously, when peace officers responded to the complaints and visited the river, all conditions changed to an orderly harvest by the commercial fishermen. It was obvious that there had been an internal "tip off." The following day the few obnoxious commercial fishermen returned to their unlawful practices.
- Until these violations are corrected, I would not recommend anyone to fish this river. Unfortunately, the fishing lodges, business in Cordova and the state of Alaska will be negatively impacted.

People from different parts of the world seek to experience the natural beauty of Alaska and their fine people. With proper enforcement, the mutual lawful sharing of the Tsiu River can be returned.

Respectfully, Donald Langrock dslangrock@earthlink.net 530-632-3561 (Cell) P.O. Box 1416 Williams, CA 95987

To whom it may concern:

I have fished for silvers on the Tsiu four times in the past twenty years. It is an expensive trip flying up to the Tsiu from San Diego, California for a week of fishing but it has always been worth the cost until my latest trip two years ago. On that trip the commercial fishermen

placed nets to within a few feet of shore - while we were fly fishing along that exact shore. They then herded the salmon into the nets with there power boats to basically empty the river of silvers.

My friends and I truly enjoy everything about the Tsiu. Five of us fished in Alaska twelve years in a row but with deep regret we are no longer considering the Tsiu. We expect rain, wind, and sandstorms but not a barren river on two of our five fishing days.

Please pass on my comments to the Board of Fisheries along with your proposals for possible better means of managing this fishery.

I will look forward to hearing how this matter is resolved and hopefully being able to return to the Tsiu.

Hopefully,

Donald Schoell Member of San Diego Fly Fishers 4141 Stonebridge Lane Rancho Santa Fe, CA 9209

Edward Rabinowe 34201 Big Meadow Lane Deer Island, OR 97054 (503) 366-3565 ERabinovve@juno.c0ll1

Attn: Dan Emhart

Thank you for continuing your effort to make the fishing experience on the Tsiu River even better. I have been fortunate to have spent vacation time on the Tsiu for the past 20 years. Doubly fortunate to spend time with AWOC for the best in Alaskan wilderness adventure in the business.

In my 40+ years of fishing vacations, the commercial fishing on the Tsiu is unique. Never before or elsewhere have I been run out of my fishing hole by a power boat. I enjoy wading and fly casting to salmon. The commercial fishermen just set their nets near where you stand fishing and run the fish into the nets with power boats running over you lines in the process. A wading fisherman has no choice but to leave the river for safety. It is hard to argue while wearing waders and carrying a fly rod with power boats swerving just feet from you while they clean all the fish out of the river and deprive you of your spot on a stretch of public open water where you were fishing.

Vacation cost on the Tsiu is significant, as is the sportsman's dollar in Alaska, and A WOC excels in giving you what you pay for. The commercial fishermen have no respect for the tourist dollar or the tourist's safety, sport fishing or common decency.

Sport fishermen are always willing to share a river. I have never heard of a sport fisherman asking a commercial fisherman to move his net no less try to run him off. The Tsiu should be as available to me with my current fishing license as it is to anyone else.

Please continue your work to assure that we all have fair access to the Tsiu River. I look forward to fishing there again.

Tight lines, Ed Rabinowe

I have taken 11 other fishing trips in Alaska and none compare to the fishing, habitat, accomodations, guides (you), and the list goes on. Silver salmon fishing el supreme!!!

Gardner(sgdmdut@hotmail.com) who accomodated me twice--once with my sons and one with a friend--and his sentiments are the same as mine. Hope to see you again this year. One comment--in the two consecutive years we went, it was much different the second year with moderate overcrowding (if you can be overcrowded in Alaska!) and also the brand of fishermen seemed to be more the combat, slob type, all of which may have been my imaginations rather than real but Don noticed the same thing. Best of luck with your endeavor and if I can be of any assistance, please let me know. . .

Jerry Young, MD 2431 Hillside Drive Soda Springs, Idaho 83276 chiefopw@hotmail.com

To Whom it May Concern:

I am writing this letter in hopes that something can be done about the persistent and increasing problem of the commercial harvesters interfering/endangering us sport fisherman in the Tsiu river.

My friends and I have been long time annual customers of the Alaskan Wilderness Outfitting Company in the Tsiu. We date back to the years when we lived in your "tent city" prior to the establishment of your present permanent cabins in your present location. I cannot recall one year when we did not experience unpleasant encounters with the commercial harvesters. Their nets usually (if not always) would stretch across at least 80 to 90% of the width of the river. They would run their noisy high powered boats across our fishing lines and many times come dangerously close to many of us who were already standing in the river even though we were there first prior to their arrival. During this years visit to the Tsiu (2008), our guide spoke to the commercial fisherman who seemed to be in charge of his group reminding him we had been fishing in this location prior to their arrival and that they were running their boat dangerously close to us, and the response our guide received was "I don't care"---as a result, we had to leave that spot and went elsewhere. I might add that the above described encounter this year was not an isolated experience but also repeated in prior years.

I find it increasingly difficult to enjoy my fishing in the Tsiu because of these repetitive unpleasant encounters with the commercial harvesters and would appreciate it if you can forward my comments and experiences to the proper authorities. It seems to me that we should be able to share the river with each other without conflict. It is my hope that I can continue to return to the Tsiu annually to fully enjoy what otherwise is a very fulfilling and enjoyable fishing experience. Anything you can do to help ensure this goal would be decisive in our returning to the Tsiu.

Sincerely, Gilbert J. Hum 1771 Longhill Drive Monterey Park, CA 91754

To Whom it May Concern:

Three to four of us have fished Alaska in early September for the last six years. It has been a wonderful experience until this year. We fished at the Alaskan Wilderness Outfitters Tsiu River Lodge. I personally spent over \$10,000 on this trip.

We had fished the Tsiu River in 2005, and had a great experience. This year's trip, however, was less than anticipated. The commercial fishermen on the river created substantial problems for the sport fishermen. It was apparent they were using their boat and outboard motor to move or herd the salmon into their nets.

In so doing they had complete disregard for me and two companions who were fly fishing the northern river bank. They (the two commercial fishermen) would point their boat at full throttle directly at us and then just before reaching our location they would make a sharp turn to prevent a collision with us. We had to carefully time our casts to prevent our line from tangling with their boat and motor.

Their actions were very intimidating and dangerous. Carelessness or poor judgement in their maneuvering could have resulted in a serious accident. The wake from their boat rocked us.

It is my conviction they purposely intended to intimidate us and frighten us from fishing the river. Noise from the outboard motor spoiled the opportunity for a true Alaskan wilderness experience. There is abundant room for commercial and sport fishermen on the Tsiu, but each must respect the others rights and territory.

I am convinced those two commercial fishermen were deliberately trying to make our time on the river unpleasant and frightening-they were successful.

• Gordon Smith PO Box 1933 Belgrade, MT 59714

Dear Dan: I come to Alaska to enjoy the scenery, the mountains and all natural things. T commercial fishermen are noisy, they do wholesale fishing and I usually stop fishing since there are few fish left after those fishermen kill them all or they simply hide and cease feeding. The fishermen bring a lot of equipment to the river and it now resembles a typical USA working operation with lots of noise, disturbance of river banks and roads. I have stopped coming to Alaska and I seek my appreciation of nature elsewhere!

Dr. Harold Frey 5720 Olinda Rd. El Sobrante, CA 94803

I came to the Alaskan Wilderness Lodge for a fishing trip in summer of 2007. I had taken at least six prior trips with them. I came from Philadelphia on my last fishing trip and it is a grueling series of plane rides to finally arrive at the Lodge on the Tsiu River. There is also a series of expenses involved in lodging expenses in Cordova and Anchorage. I point these items out since fishing at the Tsiu River involves sacrifice and strength to arrive there in addition to saving for the funds to pay for everything.

In 2007 I was exposed to the activities of the commercial fishermen in the Tsiu River. They had large nets, they had aluminum motor boats with strong Horse power motors to herd the salmon into the nets. It had a huge negative effect on my fishing experience. They drove the boats within my casting range from shore trying to herd the salmon into the nets. They moved the nets around so that we were forced to fish around their fishing territory and at times that was a chaotic situation. We worked hard to locate fishing opportunities on the river and often the salmon were a confused and skittery group.

The worst part of the experience was the large amount of noise from the motors as they ran in circles to herd the fish into the nets. How in the world can one have a positive experience with several boats running in circles and coming close to the shore where I was fishing? I would look at these fishermen at work and I felt like leaving and going home. I did not come to Alaska to see noisy boats circling the River and it influenced my decision for the summer of 2008. I did not return in 2008.

At this time I am considering a return to the river for summer of 2009 but I assure everyone that the status of the fishermen will influence my decision on returning. I have spent thousands of dollars to both catch wild salmon and to have a pleasant and enjoyable experience. That is not possible with the actions of the commercial fishermen.

I am concerned about the actions of the commercial fishermen and it will definitely influence my decision on returning for a fishing trip to the Tsiu River.

Dr. Harold Frey 5720 Olinda Rd. El Sobrante, CA 94803

To Whom it May Concern:

I have fished the Tsiu River twice, once in September 2003 when there was no commercial fishing on the River. It was my first experience fly fishing for silver salmon and I had a wonderful time.

I returned to the Tsiu River in 2007 to learn that there was commercial fishing on the River. The commercial fishermen placed nets out from the bank half way across the river on alternating sides of the river. Thus most of the fish were caught by the nets. Also, the commercial fishermen used boats to herd the fish into the nets. I caught only 3 fish the whole time I was there.

A major reason to go to Alaska is to catch fish. I can fish without catching fish here in California. As long as there are commercial fishermen on the Tsiu River I will be quite reluctant to return.

Regards, James S. Jenks 72 Corliss Drive Moraga, CA 94556


09-22-2008, 01:23 AM

gregorjim
Official Member
☆☆☆☆☆

TSIU River , Alaska

Just got back from flyfishing the Tsiu river...located between Cordova & Yakutat , below Anchorage...This was my 6th trip , & probably the last one...This river has probably the best runs of silver salmon in alaska...A lot of nearby rivers have diminished runs in cluding the Situk river at Yakutat... Problem is every commercial fisherman is keying in on the new increased prices they're getting for wild alaska salmon...about \$1 per pound or so?...Of the 5 days we stayed at the lodge, it rained really hard except for two half days...And when we were doing great in areas , the

Join Date: Jun 2008
Location: Millbrae, Cal
Posts: 85

commercials move right in & pull out gill nets & drive the salmon up past us into the nets with their boats... Seems to get worse now the prices have risen.. Turns out the lodge has a couple of permits to fish also & i reconized the owners son helping them out... Needless to say , I was pissed & let him know that you can't have it both ways.. Too bad , cause we used to get 50-100 fish a day when the weather was good... Now that California & Oregon have closed the salmon fishing, that this will only make things worse.. We still did well , until the boats moved in... Wish i had better news to relay to you about all wanting Alaska salmon fishing reports... Jim 

Dan, I am writing this to say how much I appreciate your efforts to protect the quality of the sport fishing on the Tsiu River. Before I started coming to the Tsiu two years ago, a group of friends and I had made over 20 annual trips to Yakutat where we fished the local rivers for silvers. We even made a couple of trips up in the summers to try the sockeye runs. We all enjoyed the fishing experience, realizing that some runs were going to be great and some down. However, we started looking for a new destination as the fishing around Yakutat deteriorated and the crowds increased. We found ourselves scheduling day trips just to get away from the commercial nets and the increasing crowds. Fortunately, a friend from my office, Jim Perry, had been traveling to the Tsiu and bringing back tales a great salmon run and wonderful accommodations with your company at the Tsiu Lodge.

Accordingly, two years ago, I coordinated a trip for most of my group to the Tsiu, and this year, after one last trip to the Lost River and Yakutat, we returned to the Tsiu. On my first trip to the Tsiu, I was actually a little disappointed by the number of nets in the lower river. There seemed to be more than on the Lost river. Moreover, the commercial fisherman were even more aggressive. If we were fishing along a cut bank, they would set nets a 30-40 yards above us or below us. Periodically, they would start up their boats and race around the river, occasionally spinning their boats as they moved towards their set nets. It was clear that they were chasing fish. After waiting for a while they would then go pick the fish out of their nets. The cycle was pretty regular: 1. Set nets, wait; 2. Fire up boats and go down or upstream and race back towards the net while doing some spinning; 3. Wait for 10-15 minutes; 4. Pick fish from net. Wait for a while and start process over. Fortunately, the nets were only in the river a portion of our visit.

This year, we arrived later in the season, and the nets really were not an issue for us. However, I understand from a friend who came up earlier and stayed at another lodge on the Tsiu that the same aggressive actions by the commercial fisherman were again being practiced this year. The noise of the boats, the obvious herding of fish, and the "this is our place" aggressive attitude of some of the commercial fisherman are putting a great sport fishery at risk. This year, it was such a joy to not to have to deal with the unnecessary conflict between us as sports fishermen and the commercial fishermen. I feel very fortunate that I do not have to try to make a living in the elements in which they work, but there is really no excuse for their abrasive attitude. As a group, we spend a lot of money in our efforts to find a beautiful and enjoyable environment to spend a few days each year fishing. The accommodations that you provide really add to that experience. However, the noise of the speeding boats, the obvious herding of fish and the aggressive behavior of some of the commercial fisherman will ruin both the quality of sport fishing on the Tsiu and the reputation of the Tsiu as a great place to fish with rod and reel.

Several years ago on the Setuk, I saw a confrontation between a commercial fisherman and a sports fisherman almost end in fist fight on a gravel bar. The commercial fisherman was speeding up river in a boat and got too close to a fly fisherman who was trying to back out of the hole. This is not a good situation when some of the participants are actually carrying firearms. There is room for both types of fisherman on the Tsiu. I encourage those who regulate commercial fishing on the Tsiu to take whatever action is necessary to control the aggressive behavior (e.g., setting nets from opposite banks in an off-setting manner to essentially block the river, racing or spinning of boats, etc.) of some commercial fisherman. The economic impact can be substantial when the sports fishing community believes that they are not a welcome part of the community. The Tsiu is a great river, but there are other places to fish in both Alaska and Canada where sports fisherman do not have deal with the stress of nets, racing motors and angry commercial fisherman setting nets around them.

Dan, keep up your efforts to make the Tsiu a better place for all of us. Give my best to your team. They do a great job.

Regards, Jim SAALFELD GRIGGS PC - Jim C. Griggs - Lawyer - tel: 503-399-1070 - e-mail: jgriggs@sglaw.com - www.sglaw.com

Feb 12, 2009

Dan,

It was nice to see you again at the Portland Sportsmen's Show here in Portland last week.

I'm saddened by the fact that we won't be back fishing with you since we had such a great time at the Lodge with you/crew over the past few years.

That last episode with the commercial interests on the river a year ago last September (2007) caused us to re-think how important catching fish is vs. losing life/limb due to blatant attempts by high speed fish boats to "force" us off the river.

As you know I've been in the boat business since 1967 and I understand what boat wakes and aggressive operators can do to people.

Life, limb, and equipment, were put at risk by what I witnessed by some of the commercial boats on the river that year and I haven't returned as a result of those actions.

I've been visiting Alaska since 1972 and I've fished/hunted all over the state during the ensuing years. Unfortunately I won't be back. I hope the commercial and sport fish interests can co-exist in the future. It certainly doesn't look like it's happening at this juncture. Last season we discovered Costa Rica, since we didn't return to Alaska, and I guess that's where my tourist \$\$ will be spent in the future.

Good luck with you problem I hope it doesn't cost you the business!

Jim Irwin

Hi Dan..sorry to reply so late..I've had some serious health issues & it put things on the back burner..But yes I've had issues with commercial fishermen on the Tsiu river..On a great day on a beautifull stretch catching silvers, a commercial boat dropped a net right in front of us & commenced to roar back & forth to drive the fish right through us into the nets..It went from a super situation of fishing , wonderfull snow covered moutains , occasionally a eagle flying by...to a loud constant roar of outboard motors & no explanation from the commercials to us, except a shrug of shoulders etc..Another time we had 5 great days to fish & instead of the usual one day for commercials & one day off we were informed that the DFG were allowing four of the five days we had to co.,ercials to make up for poor weather they had for a month or so.. We have to take the weather no matter what it may be so why the pre ferential treatment for commercials? It was a expensive trip to be treated so by the Alaska DFG>I had been going to the Tsiu for 6 years in a row, but that was my last..i thought the Alaska visitors travel guides were always asking what they could do to intice new travelers to visit Alaska....Well this certainly wasn't the way I expected.. *to be treated...I can spendmy money in other areas & be treated much better Jim Mancuso*

October 30, 2008

Our group has been fishing with Alaskan Wilderness on the Tsiu since year 2000. In the past few years, the commercial fishing industry has made our experience rather difficult. It is almost to the point where fishing the Tsiu on commercial days is an experience in being harassed.

Nets are placed right in front of the sport fishermen with us being pushed out of the way from a good fishing hole. When the nets are out, then the boats run at high speed with loud motors herding the fish into the nets. This is not the serene fishing that brings pleasure to us.

This year, 2008 the boats ran at high speed between us on the river where we were 20 feet apart. This included running over our lines with fish on the hook. The wake from the boats almost knocked me into the water. When the boat ran between us, the driver held his index finger aloft to salute us. There was 200 yards of water that he could have used instead of between us.

We have no way to counter the action of the commercial fishermen as we are there on a recreational trip for a few days. The expense of a trip to the Tsiu makes me wonder if I want to continue with the harassment from the commercial fishermen.

As the Tsiu is one of the few clear water streams in Alaska, I believe it should be reserved for recreational fishermen.

Jim Miner 2871 Tam O'Shanter Drive El Dorado Hills, CA 95762

James A. Perry 3385 Country Club Dr. S. Salem. OR 97302

To Whom it May Concern:

I am delighted to provide my comments regarding what I see is an almost total disregard by most of the gill net fishermen of the rights of sport fishermen who are sharing the river vim them. First of all I believe that there is a proper place for commercial fishing, but not in a small confined space such as the Tsiu given the manner in which such commercial fishing seems to be conducted.

I have been fishing the Tsiu for a number of years now and have been planning my trip as late in the year as I can in hopes of avoiding the gill net fishermen. The reason for this is the total disregard most of these guys have for the sports anglers.

Let me give you some examples. I have been fishing a stretch of water and have gill netters who apparently don't have boats wade through my fishing water hitting the water with oars herding the fish downstream into their net. I have had gill net fishermen in motorized dorys speed downstream through water I am fishing doing "donuts" through the hole and around their net to herd fish from the entire river into their net. I have been forced out of the area I am fishing for fear of being swamped by boats speeding in confined areas close to me.

As you know, I am responsible for bringing a number of anglers to Cordova and to the Tsiu. The economic impact which we have, not just to Alaskan Wilderness Outfitters but to the community and state is not insignificant.

If I had my preference, gill net fishing in the river should be outlawed, particularly given the shrinkage in the size of the river over the last several years. If it is not banned entirely, it should be more tightly regulated. Including the regulations which are all ready in effect currently, herding of fish should be banned entirely. A speed limit of 5 MPH maximum should be imposed on all motorized boats. Better yet, motors should be banned entirely.

The Tsiu is a precious resource. The economic benefit to the State of Alaska of this resource is not well served by its exploitation by a few commercial fishermen.

Frankly, if these conditions do not improve soon, I am no longer interested in coming to the area for my annual salmon fishing trip. I have discussed this with several of my companions who are in agreement. As a matter of fact, there are five individuals who have been with me on prior trips who are so turned off because of their confrontations with gill netters that they are unwilling to return.

Sincerely, James A. Perry

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To Whom it May Concern:

Our group has been coming up later and later in the season just to get away from the net situation. This means, as it did in 2010 that we missed out because of weather. I think that there is a consensus of our group that if we have to put up with power boats going through the runs we are fishing, herding fish to their nets, or for that matter putting up with, as we did 3 or 4 years ago netters wading down through the runs smacking the water with oars right in front of us, we will find some where else to fish. I have no problem with commercial fishing as long as the runs can sustain it without destroying the sport fishing (which brings a lot more money to the Alaska economy). I have big problems with commercial fishermen using their boats, oars or anything else to herd fish. Jim Perry

—
February 2, 2009 To whom it may concern:

I am writing to describe my experience during a recent visit to the Tsiu River and offer my opinion about what should be done.

In September 2008 I made my first visit to the Tsiu River Lodge, operated by the Alaskan Wilderness Outfitting Company, to fish for silver salmon. The first morning of fishing started out great, with several salmon hooked and landed within an hour. However at 9 AM the commercial salmon fishery opened and all hell broke loose. Small power boats were launched and the gill netting began. And almost as quickly the sport fishing was completely disrupted. The commercial fisherman came ashore throwing their net anchors at our feet and setting their net across the river channel directly in front of us. To add insult to injury they then motored a couple hundred yards upstream and began to run their boat in circles herding any salmon in the river downstream into their net. Needless to say this was the end of the fly fishing in this reach of the river. We moved off to a new area however the fishing, not to mention the aesthetics, throughout the portion of the river accessible to us was severely compromised for the balance of the day. Fortunately the fishery did not continue the following day but in order to avoid another confrontation with the gill netters we delayed our arrival on the river the next day, further impacting our fishing.

I can say unequivocally that this was not the angling experience I came to Alaska for. I understand that commercial fishing has an important place in Alaska history and is an important element of the economy, but what I experienced was incredibly uncivilized behavior by at least a subset of the gill netters who showed a total disregard for our interests or our safety. The commercial fishermen tried to justify their behavior by saying they had been unable to fish due to weather and had only the one day to fish, but I too had been impacted by weather and was only going to be able to fish a couple days after spending several days and many hard-earned dollars to get there. I would suggest that sport and commercial fisheries could coexist, but based on my experience in this instance with these fishermen, I have my doubts.

I believe that unless steps are taken to reduce conflicts of this nature between commercial and recreational fishermen, the very considerable economic value provided by recreational anglers to the local economy and the state of Alaska will in the long run be diminished. The incomes of lodge operators, guides, support staff, local hotels and restaurants, fish processors and others depend on visitors having a good experience when they come to your state. I strongly urge you to consider re-examining the fishery management practices in place on the Tsiu River and try to find ways in which the conflict that exists there presently can be reduced or eliminated. It is hard to imagine that with the extensive commercial salmon fisheries in your state that this gill net fishery is crucial. But if it is to continue, I believe steps are needed to modify the methods being used there, particularly the egregious and dangerous practice of herding fish with motor boats through extensive reaches of the river.

Thank you for your attention to this matter. I hope to hear about changes in the management practices on the Tsiu River that will make it worthwhile to consider visiting there again.

September 28, 2008 Alaska Department of Fish & Game P.O. Box 115526 Juneau, AK 99811-5526

Gentlemen:

For the past 9 years, several of us fish the Tsiu River for Silver salmon during the month of September. The fishing is great and the lodging in Cordova and with the Alaska Wilderness Outfitting Company on the Tsiu are the top of any fishing and hunting areas we frequent.

The commercial fishermen on the Tsiu River have become aggressive over the years to the point that they push the sport fishermen out of the way when placing their nets. This year they were so aggressive that they would run their boats at high speed between two of us that were 20 feet apart while we are standing in 3 feet of water. There was over 100 yards of water that was available for the boats. The wake of the boats made it difficult not to fall into the river. At the same time the men in the boat waved their index fingers at the sport fishermen.

The Tsiu is one of the few clear water rivers for fly fishing that I know of in Alaska. I ask that you consider the banning of commercial fishing on the Tsiu reserving the clear water fishing for the sport fishermen.

We have made reservations to Fish the Tsiu again in September of 2009. At the age of 81 I hope to make the trip for many more years.

Yours truly Jim Miner 2871 Tam O'Shanter Drive El Dorado Hills, CA 95762

To Whom it May Concern:

I would guess that my trouble with the commercial fish people goes back 4 or 5 years. They have yearly become more belligerent each year. Our trip in 2008 was really the worst, not only because the stormy weather prohibited many of us old gents, but we were treated to show off boatsmanship. Such as running a boat very near the bank with a one finger salute. There was nothing we could do about this unsportsman like behavior.

My long time fishing partner has gone on record as never returning to the Tsiu. I will return only if these injustices are corrected.

Thank you for allowing me to add my 2 cents.

John Anderson MS, DVM

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John M. Jackson, Sr. 5665 Power Inn Road, Suite 140 Sacramento, CA 95621

To Whom it May Concern:

I have been traveling to Alaska since 1971 to hunt and fish. Each year, I make several trips to Alaska, and have fished in many locations. In late August or early September, one of my favorite locations is on the Tsiu River to fish for silver salmon.

Let me first point out, that I know that the commercial fishing industry in Alaska is a very important part of their economy. I also realize that for many people, commercial fishing is their livelihood. However, there should be some limits as to what the commercial fisherman can and cannot do.

My group and I have encountered a few problems with the commercial fisherman on several occasions. Not only have we encountered the commercial fishermen cutting our lines or driving the fish away, they have also dropped their nets directly into the area of the river where we are fishing.

This past season, in September 2008, was a prime example of some of the commercial fishermen's conduct. Our group, there were 7 of us, had gone out on the river early and we were fishing in a nice part of the river opposite of where the commercial fishermen fly their fish out to Yakutat. At this time each of us had caught one fish, and we were hoping to catch our limit, but because of the commercial fishermen's conduct noted below we were unable to catch anymore.

After we had been there for about an hour, two commercial fishermen came by in their boat, and dropped their net into the "hole" that we were fishing. Then they circled their boat on both sides of the net and after about 20 minutes, they had taken about 200 fish out of that hole. Needless to say, our fishing was over at that time. I have seen some bad conduct by commercial fishermen in the past, but this particular instance was the most atrocious behavior by a commercial fisherman that I have encountered.

I have read the Harassment Law of the State of Alaska, and that the example I've given above, definitely falls within those parameters.

I truly believe that with more aggressive enforcement of the existing laws, both the commercial fisherman and the sport fisherman should be able to coexist.

Very Truly Yours, John M. Jackson, Sr,

To Whom it May Concern:

For about the past 10 years our group of 4-5 people has been coming annually to the Tsiu River with Alaskan Wilderness Outfitting Company to fish for silver salmon.

The presence of the commercial fishermen is becoming a greater negative as to whether we return.

The fishing nets often extend near the width of the river, there is no identification on the nets of the permit holder, the jet boats are deafening and have gone directly over my fishing line and severed it, the fish are herded out of our fishing site, and our presence is completely ignored near the point of contempt.

During the 2007 season while we were there, it seemed as if the river was near completely emptied of salmon by the commercial harvesters, resulting in very poor fishing for the sportsmen.

We have all felt that this river and its salmon run have produced many positive memories. The location, scenic beauty, and the quality and class offered to us by Alaskan Wilderness are outstanding.

I think we contribute significantly to the economy and should have our presence recognized so that we do not feel harassed by these people.

I suggest that the Fish and Game force them to conform to the laws of Alaska and be restricted as to frequency of access.

John L. Sorensen, M.D., F.A.C.C. 219N. Cimarron Rd. Las Vegas, NV 89145

I want to comment on my sport fishing experience on the Tsiu. I have lived in Alaska 34 years, and I have fished all over the Alaska Peninsula at various lodges and at the Tsiu for three years (one full week each time).

In all my experience of sport fishing in Alaska, I have never seen anything like the experience on the Tsiu. First, the silver salmon experience is by far the best fishing I have ever had. I love it. Secondly, the commercial fishing on the river is like I have ever experienced anywhere in Alaska. It is hard to believe that our state fishing regulations allow what happens on this incredible river.

The Tsiu is a short, extremely shallow, narrow river. I cannot believe that commercial fishing is allowed on this river because of its shallowness and importance to overall silver salmon health.

However, it is currently allowed, but the commercial fishermen abuse the privilege by:

1. Netting completely across the river--on a daily basis from my experience
2. Driving boats with large, large horsepower to herd fish above and below the nets into the nets.
3. Coming within yards of sport fishermen as they fish in the water. This year, a commercial fisherman came within yards of me at a FULL tilt while I am fishing in the water. Another woman at the lodge was also scared by a commercial fisherman coming fast within yards of her. She was terrified. I personally have been soaked with a wake from a boat while I was fishing.

I am concerned, not only for the sportfishing industry on this river, but most of all for the salmon. The Tsiu is shallow and small. The fish don't have anywhere to go when herded and when scared by the huge motors. The motors dig up the sand and change the flow of the

river. This is abuse and poor conservation of the resource.

I believe that the Board of Fisheries needs to take a long, hard look at the way this river is currently managed and the abuse of regulations that take place. It needs to change--not just for the sport fishermen--but for the long term conservation of the resource.

Commercial fishing on this river needs to be phased out, but in the meantime, much more heavily regulated and monitored.

Kate Sandberg PO Box 1025 Girdwood, AK 99587

Whom It May Concern,

I come from a family of fishermen, consisting of generations of commercial fishermen peppered with others whom have guide services for sport fishing on Lake Erie. As you can imagine, family gatherings are an intricate balance of joyous celebration and impassioned debates of each group's perspectives. It is a historic competition for fishing rites that is not defined by: a time period, economic status, or geographic location.

Fisheries can appear to be healthy and self-sustaining, yet the ebb and flow of nature can be destroyed in an instant. Many more fisheries are diminished by the actions of man, as has been documented countless times by many state agencies (i.e., Fish and Game Departments or Departments of Natural Resources). The imbalance that man tends to create is the reason these agencies exist, so as to provide state and federal guidelines to protect fisheries for future generations. Many states investigate, document, and revise the laws as well as possession limits for both commercial and sport fishing annually. Thereby, providing resources for all user groups, as well as maintaining the balance of each fishery. At this time the Tsiu River fishery seems to be a location where concern is paramount.

The situation occurring last fall on the Tsiu River seemed quite different from past years during my visits there. I am quite fortunate to say that I have fished many locations: all the Great Lakes, fly-ins in Canada, Mexico, Aruba, Jamaica and many locations in Alaska. It is Alaska's beauty and diversity which brings me back frequently. However, the recent fishing tactics noted on the Tsiu River have me considering spending my vacation monies in some other state. I was appalled by tactics employed by the commercial fisherman on the Tsiu. More difficult for me to grasp was the seeming lack of supervision or monitoring of the abuses that were taking place. I may be naïve. However, I thought that a portion of the monies collected by fishing licenses was to ensure that law enforcement could be employed to regulate the laws that are in existence.

I think the contrast between the regulations I am used to in Ohio versus Alaska may have been the reason my sensibilities were insulted. The Ohio fisheries on Lake Erie are under supervision daily during the summer months. In fact, Wildlife officials from southern counties are temporarily relocated during the summer months to ensure adequate coverage of Lake Erie's fisherman, commercial and sport. It is just a daily happening. Perhaps that is why the abuses I witnessed and heard about enraged me. I stood in shame to admit that I was from a family of commercial fishermen.

The guide staff of my outfitting company attempted to downplay the situation and act as professional as possible to ensure my safety. I assure you that I felt safer fishing among grizzly bears feeding on salmon than I did standing on the bank of the river in the presence of those commercial fisherman. Those men felt free to blatantly violate the laws of the state, as well as, plunder the balance of nature by overfishing the river, and the killing of wildlife.

Again, not to fault my outfitters, but I did not feel safe when a power boat went shooting down the center of the river while I was standing on the sandy bank with my line in the water. Nor

did it seem ecologically plausible when nets were placed across the entire river to collect the fish during their river run. Those men seemed to be trying to prove a point, that they had more of a right to claim the salmon than did any other person or entity. I viewed their actions as an obvious disregard for the future of commercial fishermen.

As a country, we often refer to Alaska as "The Last Frontier," the implication being once the frontier is gone, there cannot be another. Furthermore, without that frontier, there is less of a future for all of us. The implication, perhaps unfairly so, is that some people view Alaska as a state that must work more diligently than any other to protect that frontier, its wildlife, and its resources.

After what I witnessed, I feel the State of Alaska needs to work harder at investigating how other states or federal agencies work to enforce and manage the laws that were created to regulate this balance. Please invest some of your energies into protecting the Tsiu River. It is a beautiful place which can teach so many about nature. This fishery is so much more than two user groups attempting to benefit financially. It is about wildlife, the environment and the future. It is my belief that it is not just Alaska's job to protect its resources. I believe it is everyone's job to protect her resources.

Thank you for taking the time to read this letter. I hope that my words will assist you in taking action about the abuses occurring on the Tsiu River.

Respectfully Yours, Kristen Quisno-Witt

Customer of Alaskan Wilderness Outfitting Co. 8680 Genzman Rd. Oak Harbor, OH. 43449

Feb 12, 2009 To whom it may concern:

I have fished with AWOC about 4 times. This year I decided not to return because of the hassle of dealing with the commercial fisherman on the river. In 2007 I had a commercial fisherman run his boat at me in an attempt to chase me off the river. He came by while I was standing on a sandbar in the river and ran his boat at high speed within 2 feet of me. He had lots of open water available and it was purely an attempt to drive my group off the river. I will likely not return to the river while commercial fisherman are present. Dealing with them in the last few years has ruined the entire trip. I have no interest in paying thousands of dollars to fish in Alaska only to have commercial fisherman run their boats back and forth in front of me trying to chase the fish down river into a net while I try to fly fish. I don't want to pay to spend a week at the lodge if I can really only fish every other day. If this situation changes, give me a call and I will come back to AWOC.

Louis A. Ferreira Member, Stoel Rives LLP Office: 503.294.9412 Mobile: 503.504.8940 Fax: 503.220.2480

WILLIS A. DEMERS DENIS M, DONOVAN ATTORNEYS AT LAW 725 UNIVERSITY AVENUE SACRAMENTO, CALIFORNIA 95825

(916) 929-9680 FAX NO. (916) 929-9798

To Whom it May Concern:

I have been fishing and hunting in Alaska since 1971. Most years I make 2-3 trips to Alaska and have fished in many locations. One of my favorite locations is the Tsiu River for silver salmon in late August or the early part of September.

On a number of occasions we have had "problems" with commercial fisherman cutting our lines, driving the fish away, or, in some instances, putting their nets directly into the area of the river where we are fishing. This last season, September, 2008, was a prime example of their conduct.

There were seven of us in our group, we went out to the river early and were fishing in a very nice part of the river opposite of where the commercial fisherman fly their fish out to Yakutat. We had been there for about an hour when two commercial fisherman came by in their boat and after a moment came back and placed their net directly in front of us in the "hole" that we were fishing. At that time we had caught at least one fish per person and were hoping to get additional fish for our limit but that ended right there.

The commercial fisherman then circled their boat on both sides of the net and within about 20 minutes took at least 200 fish out of that hole and our fishing was over.

It is about the most blatant and egregious conduct by a commercial fisherman that I've seen although I have seen some that were almost as bad.

I know that the commercial fishing industry in Alaska is a very important part of their economy and I realize that many fisherman need to do commercial fishing for a livelihood. However, there should be limits as to what they can and cannot do.

I have read the "Harassment Law" of the State of Alaska and this last example certainly falls within those parameters.

It is my hope that a more aggressive enforcement of existing laws should enable both the commercial fisherman and the sport fisherman to coexist.

Very truly yours, Louis A. DeMers

Marjorie Thomas February 7 at 12:15pm Report

We were acosted by the fishermen when we were there. they almost ran us down in the river and their dog kept chasing our flies then he (the dog) got caught in one of their wenchers. I thought the poor thing would loose a leg.

 I am a guide on the Tsiu River. I have seen years of commercial fishing and sports fishing going on side by side. The Tsiu is a short, shallow and narrow river. When the peak of fishing is underway the river becomes quite crowded. Every year the crowds seem to grow. With all the people standing in the river commercial and sports fishing the use of high-speed boats has become dangerous.

Because the Tsiu is a shallow river a flat bottom boat require a lot of speed to keep from dragging the bottom. Boats running up and down the river weaving through people is asking for an accident. The boats must follow the channel, fisherman fish the channel, not much room for error. I have witnessed numerous close calls. Once an angler actually have to dive out of the way to avoid being run over by a boat sliding out of control around a corner!

There is very little respects given to the angler visiting Alaska's Tsiu River buy the commercial fishing boats. It is bad enough that angles are run out of fishing holes buy nets laid at their feet. It is just not safe or fair to run the angles off the river with a boat run in circle at high speeds in front of them. People come to Alaska for a special fishing experience, not to be run off the river buy dangers that could be regulated. Let me know if I can assist in making the Tsiu a safer place to experience.

Captain Matt Williams

Nasson Box Stable 522 East Chance Road Walla Walla, WA. 99362 509.529.9710

Nov.3,2008 To whom it may concern;

I would like to address the issue of the commercial fishermen and their total disregard for the rules and regulations of their occupation! Not to mention the downright rude and unethical treatment of the sport anglers!

I am afforded the luxury of taking a fishing trip with my father and husband once a year. The past 4years, we have chosen the Tsiu as our destination. (My dad has been there 7 years).

Scenario:

I am standing in the river, attempting to learn how to fly fish, it is quiet and serene (except for the occasional YAHOOOOO Fish ON"), and then all hell breaks loose. Here comes these deafening boats, roaring up the river, (in an area I did not think boats could get) knocking me over in the water, and then literally dropping their nets at my feet! I was scared and in shock, to think that something like this could happen. My guide came to my rescue. She asked the boat operators what they were doing. They replied with obscenities told us to go @*+*#@# ourselves and threatened bodily harm. By this time my husband, father, and friend recovered from the shock and wanted to get involved. We wanted to get all the info on these bullies, so we could talk to their boss, but there was no way to identify these people. No id numbers on the boats, nets, or vehicles. Our guide told us they were commercial fishermen and suggested we report it to the warden. I did. I never received any reply.

It is my understanding that there are rules and regulations for the commercial fisherman. I do not believe they abide by any of them!

Nets were stretched completely across the river; boats were hazing the fish into the nets and dead fish being thrown back into the water. I was appalled to see this very disgusting behavior. I am sure the department of fish and wildlife will be interested to see exactly what is going on. We have video tape and pictures to verify this tragedy. These men are dangerous. We were harassed by these bullies, were blatantly threatened and do not feel safe to fish while they are on the river. I cannot believe this type of barbaric behavior is allowed.

We had a friend with us that was so traumatized by this, he refuses to ever come back. We will be giving it second thoughts also. We come to enjoy the wilderness and all it has to offer. We did not pay all that money to be in the middle of a war zone!

I know they need to make a living also, but do it honestly. There is no need for this type of utter disrespect to the sport angler. That river is big enough for everyone.

I am asking that you send someone out to watch exactly what happens.

At least make them follow the law!

Sincerely Mickie Maxson-Box

Feb 10, 2009 To whom it may concern,

Our group did not return to the Tsiu River this past fall to fish with AWOC. We fished on the Tsiu from 2001 – 2007 for 7 straight years.

On our last trip the river had a commercial fishing operation on it. The commercials were basically fishing where the sportsman had access. They were running boats at high speed up and down the river and caused an unsafe situation. As you know the river is not big. Sportsman need to be able to wade the river in order to have casting and catching opportunities. The commercial boats on a small river not only spook all the fish, but are obviously antagonistic towards sports fisherman, leading to close encounters that will ultimately result in incidents of personal injury or worse.

Frankly, I am dismayed that the State of Alaska allows this kind of situation to go unchecked or unsupervised.

Needless to say our 2007 trip experience soured the Tsiu for us and we will not come back until this situation is resolved.

Thanks, Tom

Tom Mike Anderson, CPA Shareholder Geffen Mesher & Co., P.C. 888 SW Fifth Ave., Ste 80 Portland, OR 97204 Office: (503) 221-0141

To Whom it May Concern:

We get very upset when the commercial fisherman come along and ruin our fishing spot. They are rude and obnoxious in our opinions. If we make it this year, we won't fish after September 1st when they make it impossible to enjoy being along the Tsiu doing my favorite activity—fishing for silvers!

Jackie and Pat

Just opened your letter about forming a Tsiu River Coalition. Good idea. someone should have done it a long time ago. When we were there, we were told that the commercial fishermen could only fish every-other day, and only 3 day per week. I have friends that had fished there and said that the fishing was great, but they would never go back because one of the guys herding fish in a jet boat almost ran over his wife. We went anyway, and found that they fished every day we were there, 5 days, and that they left their nets in the river 24/5 still herded fish with jet boat, and that no one was there checking them out. Seems like the guy that does the commercial fishing also owns a lodge, talk about double dipping. From what I have been able to find out, about 100,000 fish show up and the commercial fishermen take about 60,000 of them. seems like a lot. any way good luck Paul

I took a group of 4. My son, daughter, best friend and I. We stayed with Alaskan Wilderness Outfitting out of Cordova. Names you can use, Paul Reinsch, Joseph Reinsch, Lea Anne Reinsch and George Knodle.

Even though we had a great time, lodge was great, guides were great, food to die for, accommodations great, we would probably not return.

The commercial fishermen with their jet boats, DC 3s, 4 wheelers running up and down the beach, was not what we were looking for. Fishing was ok, can be great if you hit it just right. We were told that the commercial fishermen could only fish so many days out of the week, But they were there all 5 days that we were there, and guides at the lodge said that they had been there fishing for some time before we got there. It seems that the silver run was winding down and they were trying to get all they could before they pulled out. Good luck Paul

Sept. of 2008 I took my son, daughter, best friend to a fly out lodge on the Tsiu. I had heard that the Tsiu had one of the largest runs of Silvers on the planet. I had also heard that the river was fished commercially. When I contacted the lodge I asked about the commercial fishing and was told

that they were regulated and could only fish 3 days per week. We were there Mon. thru Sat. and they fished every day. It was the last of the run and they were trying to get as many as they could. They also used jet boats to herd the fish into their gill nets. They would run the fish up and down the river pushing them into the nets. Often this was done just below where we were fishing, above where we were fishing and on several occasions they went right thru the hole where we were fishing. Not the experience we had hoped for. The lodge where we stayed was great.

great food, service, guides. The fishing was very good, not as good as we had hoped for, but good. However, we would not go back because of the way the commercial fisherman treated the river. Jet boats herding the fish, DC-3 flying in and out taking the fish to Yakutat, and 4 wheelers racing up and down the beach from net to net was not what we were looking for. If there are set rules, as to how the fish can be harvested, then there needs to be someone out there making sure they are followed.

Paul Reinsch, Lea Anne Reinsch, Joe Reinsch, and George Knodle

PHIL ERICKSON

3345 STONE VALLEY ROAD ALAMO, CALIFORNIA 94507 Phone (925) 837-0278 Fax (707) 922-1465 Email

PhilErick@sbcglobal.net

November 4, 2008 To all concerned,

I have fly fished the Tsiu River numerous times and fully enjoyed many of them, however my experiences the last three trips to the Tsiu were so bad that I have quit going to what was once one of my favorite venues.

The sole reason for my discontinuing traveling from California to the Tsiu is the disruption and harassment caused by the commercial fishing elements!

In my earliest encounters with the commercial operators, they appeared to respect us sport fishermen and avoided close encounters, sadly my last few trips that has not been the case. They act as though the river is theirs to do as they please and would like to drive us from the Tsiu by harassing us. When I have asked them to please not get so close, they totally ignore the request!

Their techniques of herding the salmon are not only unbelievably noisy, but also make it impossible for sport fishermen to access very large portions of the river, many being the very best runs for fly fishing. Many times they come right in and place their nets where we are fishing.

Sadly, until changes are made in the commercial fishing practices on the Tsiu, it will no longer be on my list of places to fish!

Sincerely, Phil Erickson The Phishin Phool

To Whom it may Concern:

We are avid fly fisher men in our 70's who have fished the Tsiu and other Alaskan rivers for decades. We accept the need for commercial fishing as well as sports fishing on the Tsiu and hope that both groups can co-exist sensibly and harmoniously and have equal rights to the river.

However, unfortunately, over the many years we have fished the Tsiu we have experienced hostile and aggressive attitudes and behaviors on the part of commercial fishermen towards sports fishermen. At times this hostility has become borderline violent and dangerous. For example, last year my wife Dr. Marlene White found herself trapped and encircled in 3 feet of water by 2 commercial fishing boats who came closer and closer at excessively high speeds. She was soon swamped, fell onto her rod in the frigid water breaking it. The propeller of one boat came so close it caught her line breaking it as well. I watched in horror while the fishermen laughed and continued driving their boats recklessly and provocatively while she lay in the water.. It took me a while to get to her and pull her out and she had to be immediately taken back to the lodge as she was soaked. Consequently, she was unable to fish the rest of the day.

After our first year staying at the Alaskan Wilderness Lodge we did not return for a few years because of similar unpleasant encounters with commercial fishermen. Last year we decided to return because of the superb facilities, expert fishing guides and the world class fishing for silvers the Tsiu is famous for. Now, once again we are reconsidering whether or not we want to put our lives in danger and return to Alaskan Wilderness Lodge at our age. Besides these types of incidents we have observed many other abuses and infringements of local fishing regulations. All of this seems unnecessarily stupid since it is sports fishermen who pump vast amounts of money into the local economy re: hotels, restaurants, liquor, sundries, transport, fishing licenses, etc. etc. while taking very little from the river. On the other hand, on more than one occasion, we have witnessed tons of silver salmon rotting on the beaches when weather did not permit planes to fly and take out the catch.

It is our hope that we will be able to return to our favorite fishing lodge and river and that new equitable and sensible regulations will address the problems and issues of sports fishing people like ourselves.

Sincerely, Ray Barker-Smith Dr. Marlene B. White 5931 Graysontown Rd. Radford, Va. 24141 540 639-0461

To whomever it may interest. I was one of a party of four who visited two years ago in sept fishing for Silvers on the tsu. We had fun but something odd was experienced also. Commercial fisherman in boats buzzed us closely in the holes we fished. It seemed odd they did it. It occurred on days they had nets in, and on days they weren't "fishing". We were told it was legal and they were either herding fish into their nets or scouting where to set nets on the days they could fish. It didn't seem right and they certainly weren't considerate of what should be our rights in paying alaska license fees, and supporting alaska businesses. They ran their boats in circles in the holes, or near the holes we fished, even though their nets were several holes away(quarter mile or so).

I suppose some friction is inevitable between sport and commercial interests. I know they have families to support. I just think if we did to them what they did to us, seemingly intentionally herding fish away from their nets, we get shot at, and I wouldn't blame them

Robert Bolton Providence Hospital Portland, Oregon

To Whom it may concern:

I have fished the Tsiu River for salmon in each of the past 8 years. My experience there on any given day can be described as either the GOOD, the BAD, or the UGLY.

As suggested by my regular trips here, GOOD predominate. In no small part because of service and accommodations afforded me by Alaskan Wilderness Outfitting. And the fact that the salmon are frequently attracted to my fly. BAD days are mostly caused by uncontrollable factors such as non-biting fish and weather - wind, rain or high discolored water.

Unfortunately, interactions between commercial netters and sport anglers frequently cause UGLY! Days that make one wonder if the cost and effort needed to fish these waters is really worthwhile. UGLY events include:

1. seeing a net placed entirely across the river in a narrow spot.
2. being rocked by the wake from speeding boats (while standing in the river).
3. watched jet boats herd salmon into nets.
4. watched nets being set less than 15 yards from where I was fishing.
5. regularly seeing nets placed in deeper channels along one shore and extend out to very shallow areas (with insufficient water for fish to swim) effectively blocking all migration upstream.
6. being "buzzed" by DC3 cargo plane (used to transport netted fish) which flew only about 100 ft above the ground a long distance from take off.

All such experiences are inconsistent with a pleasant "wilderness" fishing experience!!

I recognize that there is much I don't know about the economic and conservation considerations that are factors in formulating the regulations governing both sport and commercial fishing on the Tsiu. I can say with complete certainty that: (1) the economic value of a salmon caught by an angler is many times that of a netted fish. And (2) the number of salmon killed by anglers is but a fraction of that taken by netters. These factors together with the substantial investment made by the fishing lodges in their facilities should make sustainability of a high quality fishery a priority.

Sincerely, Ron Ott

Hey Dan,

It was good to hear from you. I'd just like to say what a great time we had fishing the Tsiu this year. It was a trip of a lifetime for both of us. We have never caught fish like we caught there on the Tsiu. It was amazing. We just had a Christmas party and served baked salmon. Everyone loved it. We've been eating on them regularly and giving some of it away, sharing it with friends and family. One of our friends spent some time in Alaska, this year and didn't catch a fish. Their guide said it was a bad year. He didn't believe us when we told him about our trip but I showed

him the pictures and the fish. We have never caught fish like that. Having said that, it was a travesty what I saw the commercial fishermen doing the that fishery. The methods employed to harvest the fish should rise to the level of being criminal. I mean blocking the river, using boats to harrass the fish into the nets, with complete disregard to the sport fishermen present in the river and after that, leaving transport tubs filled with salmon, on the riverbank rotting in the sun. The bears were the only ones who benefited from those salmon. It pissed me off then and it still does. You could see the wanton waste and you knew it was wrong but you felt so helpless to stop it.

I'm not exactly sure what you have planned, referencing forming the TRC, but we both agree something must be done, if that fishery is to survive. It's all about the money and big business and the commercial salmon fishing lobby, is the big bully on the block. Feel free to add my name to your list of supporters. I commend you for your effort.

Sherry does facebook but I don't. Hope your holidays are going good. Keep me posted.

Ronnie/Sherry Roberts

Dear Dan

When I returned home from my Tsiu trip I drafted an email and sent it to "Marston, Brian H (DFG)" <brian.marston@alaska.gov>, and explained the entire incident. Brian Marston is the contact person on the Yakutat Weekly Fishing Report from Alaska DFG.

http://www.sf.adfg.state.ak.us/FishingReports/index.cfm/FA/R1.reportDetail/area_key/18Pictures were attached to my email and are attached here.

Brian Marston basically concluded that the incident was not worthy of a citation since it appeared that the fisherman was within the commercial fishing zone. He never mentioned any issue regarding harassment. I have lost his email response, but feel free to contact him regarding our correspondence. I did retain the draft of the email that I sent him and it is attached as follows:

Dear Brian

Last Thursday, September 17, 2009, at approximately 9:30 a.m., I was fly fishing with four friends on the Tsiu river with Alaskan Wilderness Outfitting Company when a commercial net fisherman landed his jet boat in the bottom of the hole that we were fishing and proceeded and set his net across the bottom of the hole. I was playing a salmon that I had hooked at the time and the commercial fisherman just set his net about 20 yards downstream from where I was playing the fish. It was as if the commercial fisherman wanted my salmon to get caught in his net. I landed the fish, released it and watched in horror as the commercial fisherman went to the far top end of the hole above where my friends were fishing and proceeded to use his jet boat to herd all of the fish down stream into his nets. It was deliberate and intimidating. He used a series of figure 8 maneuvers that boiled up the river. He had miles of open water to set nets, but he chose our fishing spot to make his non verbal statement of disgust for sport fishermen. At the end of his boat maneuvers all of the salmon in hole were netted or spooked. We left to find another place to fish.

I took pictures of the incident and believe that the commercial fisherman was upstream from the commercial fishing boundary and thus in violation of 5 AAC 39.190. Driving salmon prohibited (It is unlawful to drive or attempt to drive salmon from waters closed to salmon fishing) I have attached those pictures. One of the pictures shows the boundary marker on the shore as a white dot just above the bow of the boat. The other picture shows it near his shoulder. The boat is facing downstream in both pictures. I have sent high resolution pictures so may be able to confirm the violation and identify this despicable person. The culprit was about 30 years old, black hair, fair complexion, black thin moustache, medium build and height. His wife and a small child looked on as he ruined our fishing.

I have enjoyed sport fishing in Alaska for the last ten years and have been a tourist and business visitor in past times. I have always enjoyed the people and respected them and their unique way of life and ultimate respect for nature. This commercial fisherman is a huge stain on your tourism industry. Although the fishing was excellent on our trip, the story is about the ass that ruined it for us. Do all fishermen a favor and cite this individual or revoke his license.

Should you have any questions, please contact me at 503 490 1474.

Regards Thomas O Moe Attorney and CPA

To Whom it May Concern:

During my trip to the Tsiu River Lodge with you in September of this year, I experienced an unpleasant situation on the river with the commercial fishermen. I think it is important that I relate this to you since it will affect my decision to return in the future. This was discussed with the guides at the lodge, but I thought it would be appropriate to advise you in writing since it will influence my decision to return in the future. Unless something is done to improve their conduct, I will not be returning to fish with you.

I understand the commercial fishermen had the authority to fish the river during the time I was there from September 18 thru 23. However, their action of traversing the river in front of our fishing area, running within less than 30 feet of us, and forcing us to stop fishing for fear of injuring someone with the boat was arrogant and dangerous. They showed no respect for our presence on the river and allowed us very little peace and quiet to fish only a small part of the river. They also set their nets across the river from us and often ran in circles to drive the fish into their gill nets.

I personally watched one group of commercial fishermen load more than 53 fish into a cart for processing while our party of over 6 fishermen tried to harvest our limit of fish. I personally fail to understand the position that the Alaska Game and Fish Department has taken on commercial fishing versus sport fishing. The sport fishing industry clearly brings in more revenue to the state than the commercial fishing industry. A relatively small number of commercial fishermen are awarded the privilege of reaping the greatest amount of the available resource while the sport fishermen are left with less and less. Regrettably, it has affected my decision to return in the future.

Sincerely, Vernon Broussard

My name is Tom Prijatel. My wife Katie and I own and operate Alaskan Wilderness Outfitting located in Cordova, AK. We have had a sport fishing lodge on the Tsiu River for 28 years. I am here to express our concerns over activities on the Tsiu River and ask for you to consider proposals 301, 302 and 303.

Commercial fishermen place there nets along the river, which is a single channel, average of 2' to 3' deep holes where the fish are holding up and use the boats to herd other fish back into the nets up to 400 yards away in a circular motion. They can clean the river of fish in 3 to 4 hours. This leaves very few fish in the river for any sport fishing until another tide or build up. With the growing number of sport fishermen on the river this has led to an increase in conflicts between the two user groups. These boats, with up to 90hp motors and very loud come dangerously close to sport fishermen already in place fishing. There have been many instances where the fishermen have been frightened out of the river. We have reported incidents to the proper authorities to no avail. We feel that this method of herding is not necessary and that the fish will eventually run into the nets while going up river, just taking a little more time. This would leave fish in the river at all times for both user groups. If the two user groups were fishing together, sport fishermen would actually be driving fish into the nets while fishing. The numbers of fish are not the problem.

The natural value of the river has fallen dramatically and people just don't want to experience this. Our business has fallen off 50% in the last 5 years and other lodge owners have complained about vacant beds due to this problem. This will fall off more in years to come if we don't do something as you can see in the letter from our past guests.

In no way are we trying to stop commercial harvesting on the Tsiu. We respect everyone's right to use the resource and hope this will be a start in making the Tsiu River the great sport fishing and commercial fishery that it is. We are open to any suggestions and hope this subject will be addressed. Thank you.

PROPOSAL 301

**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM
PO BOX 115526, JUNEAU, ALASKA 99811-5526**

BOARD OF FISHERIES REGULATIONS

- ☐ Fishing Area
☐ Subsistence
☐ Sport
☐ Personal Use
☐ Commercial

JOINT BOARD REGULATIONS

- ☐ Advisory Committee
☐ Regional Council
☐ Rural

BOARD OF GAME REGULATIONS**Game Management Unit (GMU)** _____

- ☐ Hunting
☐ Subsistence
☐ Resident
☐ Nonresident
☐ Trapping
☐ Other _____

**1. Alaska Administrative Code Number 5
AAC**

**Regulation Book Page
No.**

2. What is the problem you would like the Board to address?

- Currently, harvesters are allowed to set nets in almost the entire fishable portion of the river. This proposal is for not moving the existing F and G escapement marker to a different location. It is in the right spot. But to create different boundaries for the users of the river. Boundaries that do not interfere with current commercial harvest levels or opportunity, and addresses an ongoing problem of disappearing sport fishing area as well as the confrontations between the user groups.

In the last 40 years the river has lengthened itself from 1 mile to about 4.5 miles long. It does vary from year to year but it is getting longer over time. This has increased the commercial harvest area over 400%. Conversely, in the last 20 years the "lake" above the marker has completely filled in with sand. An area that sports fishers relied on to get away from the commercial harvest activities. This has decreased the area to sport fish above the marker to almost nothing. Forcing sport fishers to utilize the area below the marker. This could be considered an allocation issue.

When you look at the commercial catch history you will see that no matter what the length of the river, the harvest numbers stayed within a certain range. 2010 is a perfect example of harvesting above the average with a little more than 1 mile of river to set nets. (The marker was moved due to low water conditions) The catch was the second largest in the history of the river and was the 'cleanest' catch as well. (Not as many blush fish).

Another problem with the way things are now is after a commercial opener there are no fish left in the 4 mile area that the nets were in. Leaving very few or no fish for other user groups. The small area above the marker is over fished and the fish do not bite very well. And very few new fresh fish making it that far. So you hope more fish come in on the next tide and the river hopefully fills in overnight. But 9 am the next morning the nets go back in and the cycle starts again.

With all that said, it only stands to reason to create these boundaries. I am proposing to allow 1.5 miles of river open to set netting. Starting at a point 500 yards up river from the mean high tide line then continuing for the next 1.5 miles. Unless the river changes to where there is only 2.5 miles of fishable water then the river is divided equally in half regardless of the length. The fish escapement marker should remain in the same spot.

The 500 yard corridor is because the Tsiu River is the #1 Coho sport fishing river in the world - and should be treated as such. The greatest sport fish opportunities are at the mouth on an incoming tide. It is the reason people come to here to fish. Everywhere else on the river is great but that is what makes this the most prized destination on earth for lots of people.

There is absolutely no reason to set nets in the first 500 yards of this river. The fish literally shoot up river to the first holding pools above the tide line before they stop to rest. Very few fresh fish hold in this area. The netters will have the same opportunity starting at the 500 yard mark and not have the problems associated with incoming tides. Like seals eating untold numbers of fish out of the nets and the constant confrontations with sport fishers.

With this proposal both user groups will have equal opportunity at the fish. But by having nets in the first 500 yards one user group will not have equal access or opportunity at the resource. If you force all sport fishing above the netting area the fish will never get to them. The few that do get by are stressed out and won't bite; many have net marks. This may cause an allocation issue.

Let me give you an example: Let's say there are 50 sport fishers (this is above average) at the mouth of the river and there are 3000 fish (that is below average) coming in on a tide. With a limit of 4 per person that would mean 200 fish could be taken. Many sports fishermen practice catch and release so 200 fish taken is above average leaving 2800 (very conservative) fish to go up the 500 yards to the netting area. This happens in a matter of 3 hours. The netters have 24 hrs to get those fish. This is just during the daytime tide. There is always another when there is no one sport fishing. And on some tides, the fish never stop coming in - sometimes 3 or 4 days in a row at the peak.

6. Solutions to difficult problems benefit some people and hurt others:

Who is likely to benefit if your solution is adopted?

a) the fishery resource;

- 1) biological -All positive – there will be a smaller area that will be disturbed by the commercial activities.
- 2) management – Should stay the same.
- 3) economic utilization – All positive. The river and area are not being used utilized anywhere near its economical potential.

b) harvesters;

- 1) economic efficiency of the harvesting function - Positive – they will be able to harvest just as many. And increase the value of the catch.
- 2) species interdependence impacts – None.
- 3) harvesting asset ownership impacts – There are no harvester assets on the Tsiu. Most harvesters are squatting in small shacks along the river. They do not pay for leases or taxes on improvements like other businesses that use the river.
- 4) distribution of product value – Will more than likely increase with higher value fish.
- 5) market access – Will not be affected

c) the sector, species, and regional interdependence relationships;

It is all positive for the species because it is way less stress on the fish's migratory route. The sector and regional interdependence relationships should remain intact and if anything get stronger with the potential increase in revenue.

d) safety;

Safety would increase dramatically by minimizing the chance for an accident on such a small river system. The closest hospital is in Cordova, which is an hour away by plane. So that equates to at least 3 hours from the time of the accident to the hospital in perfect conditions. And as much as 3 days in bad weather.

e) the market;

- 1) market access and product form - Nothing should change here except that the commercial harvest may be more valuable.
- 2) market timing – I don't believe this is much of an issue because of the relatively low quality of the salmon they are harvested mainly for the eggs. The low quality comment is because of the way the fish are handled. Tossed around multiple times like basketballs, full of sand with little or no ice. Sitting on the dark sand in the hot sun, and at times, for a day or more. When the water is low and the sun is out the river water is 60 degrees or more. That means the fish are that same temperature when they are netted. The fish are 4 feet deep in a tote. It would take a lot of ice to cool them down to 44 degrees while sitting in the sun.
- 3) competitive opportunities – Should stay the same for harvesters. Will increase for other users.

f) processors: The processors should not be affected except that the quality of the product may be higher.

g) local communities:

The local communities will benefit the most. By increasing the tax revenue to the cities and the increase of revenue to the Bed & Breakfasts, hotels, liquor stores, grocery stores and the local businesses that purchase their goods in those communities.

- 1) Employment will increase.
- 2) Industry infrastructure impacts – There will not be any on the harvester side. The other businesses may increase infrastructure thus increasing tax revenue.
- 3) Ownership of local harvesting and processing impacts – none
- 4) Gain or loss of associated businesses – There will not be any on the harvester side. The other businesses associated with sport fishing will gain if this proposal is adopted and there certainly will be loss if not.

Who is likely to suffer if your solution is adopted?

No one.

7. List any other solutions you considered and why you rejected them.

None.

Submitted By: Tsiu River Coalition

Name / Signature

Individual or Group

PO Box 1516

Cordova, AK

99574

Address

City, State

ZIP Code

218-252-2337

dan@ernhart.com

Home Phone

Work Phone

Email

Management report by Sheinberg Associates

PROPOSAL 302

**ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM
PO BOX 115526, JUNEAU, ALASKA 99811-5526**

BOARD OF FISHERIES REGULATIONS <input type="checkbox"/> Fishing Area <input type="checkbox"/> Subsistence <input type="checkbox"/> Personal Use <input type="checkbox"/> Sport <input type="checkbox"/> Commercial JOINT BOARD REGULATIONS <input type="checkbox"/> Advisory Committee <input type="checkbox"/> Regional Council <input type="checkbox"/> Rural	BOARD OF GAME REGULATIONS Game Management Unit (GMU) _____ <input type="checkbox"/> Hunting <input type="checkbox"/> Trapping <input type="checkbox"/> Subsistence <input type="checkbox"/> Other _____ <input type="checkbox"/> Resident <input type="checkbox"/> Nonresident
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1. Alaska Administrative Code Number 5 AAC	Regulation Book Page No.
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2. What is the problem you would like the Board to address?

- Currently, commercial harvesters use powered boats on the Tsiu River to harass and drive, or herd Coho into set gillnets during each commercial opener (two to five or more 24-hour periods per week during the season). I propose to eliminate the use of powered boats to herd fish into set nets on the Tsiu River. This river is small and shallow and has only one channel in which the fish return. The river averages 20 yards wide and two feet deep¹. The opportunity to harvest fish, in the same quantities, without the use of powered boats for driving fish on such a small river will remain intact.

Is a change in vessel length proposed? - No.

Are the transferability of permits or harvest privileges affected? - No.

Is there a defined role for processors?. - No.

Will this proposal be a permanent change to regulation? If not, for how long?

- This is a permanent change in the regulations for the Tsiu River.

If adopted, will your proposal require a change in monitoring and oversight by ADF&G?

- Powered boats will still be used to attend to nets, but the herding of Coho will not be allowed. This will require a slight change in monitoring and oversight by the ADF&G. However, it is not expected to be substantial. Currently, ADF&G monitors harvest and escapement.

Will vertical integration (e.g. harvesting and/or processing) or consolidation occur? Will limits be imposed? - No.

How do you propose to monitor and evaluate the restructured fishery?

- It will be monitored and evaluated with the way it is done now. Counting harvest and escapement and calling emergency openers as seen prudent.

Is there a conservation motivation behind the proposal? If so, please explain.

- There is a conservation motivation in that scaring or herding large numbers of Coho into nets is not appropriate for the run. Regulation 5 AAC 30.331 2(b) says:

Set gillnets may not obstruct more than two-thirds of any salmon migratory waterway, except in the Tsiu River, where set gillnets may not obstruct more than one-half of the waterway. In the intertidal zone this applies at all stages of the tide. ☐

If the nets are set as stated above, then the escapement tends to be the correct amount for

sustainability. However, if the fish are herded or circled into the nets, the escapement numbers fall and the run is potentially harmed. As well, the herding process itself further stresses fish.

The use of powered boats to herd fish directly impacts sport fishermen on the Tsiu as well. It is dangerous, spoils the sport fishing experience, and negatively impacts the run.

What practical challenges need to be overcome to implementing your proposal, and how do you propose overcoming them?

- The practical challenges will be to convince the harvesters that power boats are no longer allowed to scare fish and to ensure that penalties are given out when infractions occur to discourage further scaring of fish. Nothing else will be a challenge.

What are the objectives of the proposal?

- a. to make the river safer for sport fishermen.
- b. to give the fish that ordinarily would not be gill netted a safe return and not to stir up the river beds.
- c. to give sport fishermen a better quality fishing experience on such a small river.
- d. to increase the tax revenue to the city of Yakutat from new and returning sport fishermen.

How will this proposal meet the objectives in the previous question?

- a. the high powered boats make an unsafe environment for all users because the river is:
Single channel river, most of it is not braided. The fish migrate up a single path in this river regardless of any braids.
Short – 4 -4.5 miles long.
Small - 60 feet wide.
Shallow - less than 2-foot averageⁱ.

With the conditions of the river as stated above, the sport fishermen have only one place to wade out to reach the single channel available to catch fish. Boats use the same channel at a high rate of speed. This causes many encounters of less than 10 feet between boats moving at high rates of speed and sport fishermen standing in soft sand in waist-deep water. The boats need to move fast because of the danger of getting stuck on all the shallow sand bars. This is a recipe for disaster.

b. The run is harmed by scaring fish that would ordinarily make it past the nets into those nets. The repeated running down of fish that make it past consecutive nets stresses fish that are not netted. The same fish can be run down as many times as there are nets. 8-12 nets are normal. You have to remember that there is no clear path for the fish. The nets cover the entire migratory channel. So each fish has to escape each net to make it up river.

c. The area is flat with no vegetation except for some grass. You can see for miles in all directions. Thus you can see several of the high-powered jet boats constantly circling and hear the nonstop whining of the motors. Powered boats, by necessity, also must get close to sport fishermen, which is a scary experience. It appears often to be harassment to the sport fishermen. Between the noise and the fear factor, fishing on the Tsiu during commercial openers is difficult and not enjoyable.

d. Most sports fishermen are very proactive pertaining to environmental issues. They are apt to spend money in locations safe from harassment where they can view wildlife within its natural setting. Direct tax and lease revenue from sport fishing verses commercial harvesting (where commercial harvest tax and lease revenue is already at its maximum) is a staggering 10:1 ratioⁱ. Allowing commercial fishermen to use power watercrafts to herd salmon on the Tsiu diminishes this environment, creates potential safety issues and jeopardizes a huge untapped source of revenue for the local and state economies.

Please identify the potential allocative impacts of your proposal. Is there an allocation or management plan that will be affected by this proposal?

This proposed regulation will not affect allocation. This is not a matter of someone has to give up something so someone else gets more. The netters will still catch just as many fish. This is due to the fact that the nets are 90 feet in length. Easily covering and blocking the entire migratory channel, which is usually 20-30 feet wide¹. The fish have no choice but to swim into the nets.

What is your understanding of the level of support for your proposal among the harvesters, processors, and local communities?

The underlying sentiment for this proposal from the handful of harvesters on the river and the single processor that buys fish in Yakutat is negative. They would like to see nothing changed. The local communities are the typical 50/50.

Sport fishermen: I find it interesting that this question didn't include other user groups that don't primarily harvest fish. The remote sport fishing community overwhelmingly supports this. Its members think it is rude, obnoxious, and pitiful that the #1 Coho sport fishing river in the world is treated in such a manner. The Tsiu River Coalition is made up of people that use the resource but actually harvest very few fish and contribute the lion's share of revenue from this resource. Business owners and professionals from many different fields all agree with this proposal.

What are the potential short and long-term impacts on conservation and resource habitat?

Both the short and long term impacts will be nothing but positive. The fish will be less stressed and the resource habitat will be healthier because there won't be high powered jet boats stirring up the spawning beds.

1) development of fisheries resource – This fishery is long overdue for some development. Right now it is only managed for commercial harvesting. The management needs to include other user groups when making decisions about the fishery.

2) impacts of proposal – (short term) There will be some slight adjustments made to the commercial harvesting; (long term) fishing conditions will improve and actually get better for everyone.

What are the potential legal, fishery management, and enforcement implications if this proposal is adopted? What other governmental actions may need to be taken into account?

Legal: I can't see any with the fishery itself. Conflicts between user groups should drop significantly on the river.

Management: Should make managing easier with a steady flow of fish being harvested instead of the peaks and valleys associated with the current structure.

Enforcement: This is always a problem with a small remote fishery. But since the boats were causing the majority of the issues this should help alleviate a lot of enforcement problems in "a get all you can before the next guy does with total disregard for others and their safety" fishery.

3. What will happen if this problem is not solved?

The fishing on Alaska's Tsiu River is known worldwide. Without changes in the commercial fishing practices on this river, the value of the sport fishery will continue to decline. The amount of revenue to the city of Yakutat will continue to dwindle. Lodges (the largest direct revenue contributor by a 10 to 1 margin) will have to slash their prices creating a discount special fishery, where no one makes any money, out of what was once a high quality, worldwide destination, or go out of business.

This proposed regulation will be an improvement to the entire fishery, the environment and increase the overall experience and safety for everyone. Escapement numbers will be maintained as intended by Alaska fishing regulation and there will be more wildlife to see because they won't be scared away by the obnoxious activities.

POTENTIAL ESCAPEMENT - Refers the area below the escapement marker. These are fish waiting to move up to the spawning beds. In this area there are many factors that could stop the fish from moving freely up stream. Such as low water conditions. This area is free of any obstructions when doing aerial surveys. The fish are in a single channel and swim on a single plane. (they are not stacked up on top of each other) The river is clear and shallow. What is seen from the air here is the actual number of what is there. Whatever the total count is in this area must be divided in half to get an accurate potential escapement.

Then you add the **ABOVE MARKER** and **POTENTIAL ESCAPEMENT** together to get accurate escapement numbers. And it is this information that has to be used to manage the fishery properly.

In 2010 the **POTENTIAL ESCAPEMENT** (actual #) was used in determining when to have commercial openers.

The **WEEKLY ESCAPEMENT GOALS** is meant to be used as a guideline to ensure enough fish get to the area **ABOVE MARKER**. There has to be a minimum of 5000 **ABOVE MARKER** to have the first commercial opener. The BEG (biological escapement goal) of 10000 is the bare bones minimum that the F and G wants to have for sustainable future runs on the Tsiu River.

2010 was an extremely dry, low water year. And to compound matters a beaver dam was blocking 100% of the salmon migration to the spawning beds. On or about Sep 1 it appeared that enough of the beaver dam was taken down so fish could get over it. But it was a small opening and only one fish at a time would swim over. It wasn't like opening the flood gates.

Looking at the chart, from Sep 1 to Sep 7 about 6000 fish moved into the **ABOVE MARKER** area. A little rain the night of Sep 4 probably helped this. Then between Sep 7 and Sep 13, during the lowest water conditions seen yet this season, 9000 fish moved into the **ABOVE MARKER** area. So it took all summer for 5000 fish to move above the marker in more favorable conditions and then in less than two weeks 15000 moved? That would mean almost all the fish in the entire **POTENTIAL ESCAPEMENT** area moved up. Or that a bunch of new fish swam through the potential escapement area to above marker area. Either way there would be fresh fish above the marker or in the potential escapement area. There was not. There were groups of people sport fishing in the area above the marker just about every day during this Sep 1-13 time frame. The fish were just getting darker and darker. Nothing fresh or worth keeping. Sep 7, 8 and 9 not many fish came in the river.² A lull in the run? Or the three trollors off shore were catching them? It doesn't matter. The point is that the possibility of 15000 fish, or more importantly, 9000 fish moving up between Sep 7-13, is a little hard to believe. Plus there were four openers between Sep 6-13. The total catch for these openers was about 40,000.³

DATE	ABOVE MARKER escapement # (actual #)	POTENTIAL ESCAPEMENT escapement # (actual #)	INCREASE ABOVE MARKER escapement # (actual #)	ADD escapement #,s)	WEEKLY ESCAPEMENT GOALS escapement # (actual#)
21-Aug	2500 (5000)	3500 (7000)		6000	5000 (10000)
24-Aug	2500 (5000)	5500 (11000)	0	8000	
28-Aug	2500 (5000)	6750 (13500)	0	9250	10000 (20000)
3-Sep	3000 (6000)	5000 (10000)	500 (1000)	8000	
4-Sep					15000 (30000)
7-Sep	5500 (11000)	10000 (20000)	2500 (5000)	15500	
11-Sep					20000 (40000)
13-Sep	10000 (20000)	7000 (14000)	4500 (9000)	17000	
18-Sep					25000 (50000)
21-Sep	11000 (22000)	7500 (15000)	1000 (2000)	18500	
24-Sep					30000 (60000)

² Where and when people were sport fishing, what they were catching, the strength of the run, rain and river conditions are from Dan Ernhart's daily observation recordings.

³ All aerial survey and commercial fish counts came from Gordy Woods (Yakutat area fisheries manager) via email.

I do not support proposal 270.

Members of the Board,

This proposal seems reasonable on the surface but it is not. It is just another example of the culture within the process that unfairly favors commercial fishing interests over ordinary Alaskans' personal use.

I will give you an example to illustrate my point.

In the past ADF+G had a justified biological concern over Rock Scallops, and submitted a proposal to limit their bag limit to 4. At the board meeting in Sitka a commercial fisherman in the audience suggested weather vane scallops also be limited. The board responded by assigning a "stakeholders" group out of audience members and asked them to recommend bag limits for rock and weathervane scallops.

The "stakeholders" group consisted of several people in the commercial fishing industry, an ADF+G biologist, and a Wildlife Trooper. There was no one in the group, on the Board, or from ADF+G representing the interests of ordinary resident Alaskans.

There was no information offered to justify any action in regards to the personal use harvest of weathervane scallops. The "stakeholders" group arbitrarily recommended a bag limit of 10 and the board adopted it as a regulation without comment.

The meat from 10 weathervane scallops does not justify the time and expense required to go diving for them. This unjustified regulation effectively eliminated the personal use fishery for weathervane scallops to satisfy the whim of a single commercial fisherman.

This unfair, unjustified, regulation has been in effect for over 10 years because the Board and ADF+G disregarded the interests of ordinary resident Alaskans in favor of the commercial fishing lobby.

Proposal 270 is the same thing. It is ADF+G responding to the unfair demands of the commercial fishing lobby.

In 2010 commercial fishermen sold over 9 million pounds of sablefish from waters that are largely unfishable by ordinary Alaskans. And, they retained all they wanted for their own personal use. Yet, they want to add more restrictions on ordinary resident Alaskans who are trying to efficiently fulfill their personal use needs.

Mike Fox
Juneau

Members of the board,

These comments provide catch data from ADF+G that help illustrate some of the reasons why I do not support their proposal #270.

#1-It is unreasonable and unfair to increasingly limit resident personal use fishermen. *Especially while allowing unlimited personal use catch for commercial fishermen.*

#2- It is unnecessary to further limit resident personal use fishermen when the environmental conditions already severely limit harvest. Sablefish are found in the deepest waters. Strong currents, wind, and rough seas are common because of the long fetches associated with these waters in Southeast Ak.

#3-It is unreasonable and unfair to burden Alaska residents with permitting and catch reporting, while ADF+G has demonstrated a disregard for the same information from resident and NON-resident commercial fishermen.

It is very common for both resident and non-resident commercial fishermen to retain fish for personal use. However:

(1)-In 2010 only 22 % of commercial permits reporting sablefish landings reported any sablefish retained personal use. 78% claimed 0 fish eaten onboard, 0 fish for the smoker, 0 fish for home pack, and 0 fish for family and friends.

(2)-For King Salmon in 2010 in SE AK. Only 14% of permits reporting commercial catch reported any personal use catch.

(3)- For Red Salmon only 9% reported a single fish retained for personal use.

(4)-In 2010 the State investigated only 2 cases in SE that (incidentally) included failing to report personal use catch by commercial fishermen.

It is common knowledge that commercial fishermen frequently eat fish on their boats, take fish to their homes, and give fish to their friends and family. ADF+G has expressed no concerns about managing fisheries without accurate personal use catch reports from both resident and NON-resident commercial fishermen.

It is unfair, and unreasonable, for ADF+G to recommend greater restrictions on Ak resident personal use fishermen than they do on, both non-resident and resident, commercial fishermen's personal use catch.

M. Fe

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Board Members.

I do not support proposal 269.

This proposal increases the burden on ordinary resident Alaskans.

Ordinary Resident Alaskans are being treated unfairly.

Fisheries management, and the board of fish, are unfairly influenced by the commercial fishing lobby and the commercial charter sport fish lobby.

Example:

Ordinary resident SE Alaskans are prohibited by regulation from taking any King or Coho salmon for personal use. While, non-resident commercial fishermen's personal use catch is unlimited.

It clearly is not fair to ban the residents of SE from taking any personal use king and coho salmon while allowing commercial fisheries, personal use catch by commercial fishermen, and a commercial charter fishery?

Mike Fox
Juneau.

Board Members,

Reference Proposal 269.

Please keep these comments in mind as you consider the next 10 proposals.

It has been consistently demonstrated over the years that the most effective way to influence your decisions is to attend the meetings, participate in the stake holders discussions, and comment in person.

Unfortunately, average Alaskan Residents suffer an extreme disadvantage in this regard. That disadvantage becomes evident in the regulations. For example...

5AAC 77.682(c) The department shall not issue a (personal use) permit for the taking of king or coho salmon...

It is grossly unfair that we conduct major commercial fisheries and commercially guided sport fisheries on king and coho salmon in SE yet completely shut out ordinary residents from personal use fishing those species. How is this fair? How is this in the broad public interest of the residents of southeast? No other region of the state so thoroughly denies ordinary residents from taking king and coho salmon for personal use.

Another example... The limits placed on (non commercial) black cod fishermen in recent years. That action was nothing short of a shameful embarrassment.

When you look out at the audience, and read your comments, it is evident how this can happen. The majority of people involved have a monetary interest in being there. **THEY CAN AFFORD THE TIME AND EXPENSE TO BE INVOLVED AND PRESENT.**

They are either being paid outright, or, being involved is part of running their business. It is their job.

I ask you to represent the broad public interest. I ask you to consider the interests of all the residents of southeast who are too busy at work to attend your meetings. I ask you to consider those who can't deduct their travel expenses. I ask you to consider the people who can't make sense of the regulation process or management of their resources and are relying on **THEIR** board to be fair.

Personal use fish can be just as important to ordinary residents as they are to commercial fishermen, and we all deserve the same opportunity to catch them.

We have lost sight of the fact that the reason commercial fishing is justified is because it supports an industry that is important to our state's economy. And, while allowing fishermen "not to sell" their commercial catch is nice for them, it is not part of the commercial fishing industry.

"Catch not sold" is almost certainly not accurately reported on fish tickets, And, there is no way to check. When a boat delivers the buyer fills out the ticket and never weighs the "catch not sold" and no number goes on the ticket. A commercial fisherman can make a last set or drag for his "home pack" and no fish ticket is ever written at all. Seiners can (and do) head south with freezers full of fish that are never reported.

Inaccurate "self" reporting on fish tickets is very easy and very common. The temptations are too many and too great. And, the chances of getting caught are too slight.

Both resident and non resident commercial fishermen enjoy very liberal personal use opportunities while ordinary residents of southeast are severely limited. That is just not right.

I appreciate your public service, I know your sessions can be brutal, and I hope you can make fair decisions.

Mike Fox.
Juneau

Board Members,

I do not support Proposal 269. It widens the gap between commercial and personal use fishermen's access to our resource.

It is grossly unfair to apply more personal use fishing restrictions to residents who are trying to efficiently catch fish for their personal use; while both resident and non resident commercial fishermen can catch unlimited numbers of fish for their personal use.

Resident and non resident commercial fishermen are allowed unlimited personal use catch that largely goes unreported.

5AAC 39.010 allows any commercial fisherman to retain fish for their personal use needs. There is no personal use permit required, no limits, and historically in SE, no reporting.

In some instances those fish are supposed to be self reported on fish tickets as catch not sold.

However; catch information received from "self" reporting is self serving and inaccurate.

I do not support adding more restrictions to the personal use fishing of resident commercial fishermen.

And, I do not support adding more restrictions to the personal use fishing of other Southeast Ak. residents either.

We all should be able to efficiently fulfill our personal use needs.

Mike Fox
Juneau

Board Members,

I do not support Proposal 270. It widens the gap between commercial and personal use fishermen's access to our resource, and, this proposal is an over reaction to a problem that doesn't exist.

It is grossly unfair to apply more personal use fishing restrictions to residents who are trying to efficiently catch fish for their personal use; while both resident and non resident commercial fishermen can catch unlimited numbers of fish for their personal use.

5AAC 39.010 allows any resident or non resident commercial fisherman to efficiently catch fish for their personal use needs. There is no personal use permit required, no limits, no gear restrictions, and historically in SE, no reporting.

In some instances those fish are supposed to be self reported on fish tickets as catch not sold. However; "self" reporting is self serving, inaccurate, and unreliable.

I do not support adding more restrictions to the personal use catch of resident commercial fishermen. They should be able to fill their smokers as in the past.

I do not support adding more restrictions to the personal use catch of other Southeast Ak. residents either. Their opportunity to catch sablefish is already severely limited by the, difficult to access, habitat favored by sablefish.

All residents should be allowed to fulfill their personal use needs as efficiently as possible.

Mike Fox
Juneau

Board Members,

I am in favor of proposal #274. It will help Southeast Alaska residents fulfill their personal use needs for King, Silver, and Red salmon. And, it is in support of the broad public interest of the residents of Southeast Alaska.

Southeast Alaska Residents should be allowed an opportunity to efficiently harvest salmon for their personal use, similar to the opportunity currently provided for both resident and non resident commercial fishermen.

Any commercial fisherman, from anywhere, can fulfill their personal use needs efficiently. 5AAC 39.010 allows any commercial fisherman, regardless of residency status, to retain unlimited numbers of fish for their personal use needs. Typically boats come north with freezers full of groceries and go south with freezers full of fish. We allow a deckhand from Bellingham to take home unlimited amounts of king salmon for his personal use, while at the same time a resident of Juneau is not allowed to take any.

A person might argue that fish retained by commercial fishermen could just as well have been sold, so it doesn't matter if they are taken home to Idaho, Washington, or Hawaii. Well, it does matter. We allow commercial fishing because it is an industry. Fish that are not sold do not support the industry. All those fish do is fulfill the personal use needs of the commercial fisherman, his family, and friends.

The intention of this proposal is to allow residents of SE to efficiently personal use fish in areas where there is already a commercial season. For example: gillnet in Taku Inlet, or trolling outside Yakobi Island.

In other areas of the state this is already very common. Examples include the Bristol Bay Region and the Copper River Delta where residents are permitted to use gill nets to fish for king, red and silver salmon during the commercial season.

A person might argue that a resident can fulfill their needs sport fishing. They can for some species, in some areas. However, there are many instances where it is impossible to efficiently fulfill personal use needs sport fishing.

For example: In 2011 the average rod hours in the Juneau area to catch a king salmon during the months of May, June and July was 92. That's 92 hours of fishing to catch 1 king. The best week was June 13th-19th which required 45 rod hours to catch a single king.

Residents of Southeast Alaska should have an opportunity to efficiently fulfill their personal use needs. Especially when we already allow exploitation of our resource for commercial purposes.

Summary:

#1-The objective is to provide an efficient means for residents to fulfill their personal use needs for king, silver, and red salmon.

#2- Resident and Non-Resident commercial fishermen are already allowed this opportunity.

#3 – The state is very liberal with the commercial fishing user group by allowing unlimited take for sale, and unlimited take for personal use.

#4 – Fish taken by commercial fishermen that are not sold, do not support the legal commercial fishing industry, or economy of Alaska. They do fulfill the personal use needs of commercial fishermen, their friends, and families.

#5 – I do not support repealing resident commercial fishermen's ability to harvest fish for personal use. I question allowing non resident fishermen to harvest unlimited numbers of fish for personal use.

#6 –There is no efficient alternative to personal use fishing available to most residents of southeast Alaska.

#7 – The bottom line is that all Southeast Alaska residents deserve an opportunity to efficiently harvest all species of salmon for personal use, not just those employed as commercial fishermen.

#8 – I do not support reporting requirements for commercial fishermen's personal use harvest. Historically "self" catch reporting produces very inaccurate data that is unreliable and misleading.

#9 - If there are enough fish for a commercial season, and commercial fishermen's personal use; then there are enough to allow residents an efficient personal use fishing opportunity.

Mike Fox,
Juneau

Board Members,

I support proposal 277 with the following change.

Allow the use of gillnets in Taku Inlet for personal use fishing during the commercial fishing season.

It is grossly unfair to apply more personal use fishing restrictions to residents who are trying to efficiently catch fish for their personal use; while both resident and non resident commercial fishermen can catch unlimited numbers of fish for their personal use.

Resident and non resident commercial fishermen are allowed unlimited personal use catch that largely goes unreported.

5AAC 39.010 allows any commercial fisherman to retain fish for their personal use needs. There is no personal use permit required, no limits, and historically in SE, no reporting.

In some instances those fish are supposed to be self reported on fish tickets as catch not sold.

However; catch information received from "self" reporting is self serving and inaccurate.

I do not support adding more restrictions to the personal use fishing of resident commercial fishermen.

I do support finding ways to help other residents efficiently fulfill their personal use needs.

We all should be able to efficiently fulfill our personal use needs.

Mike Fox,
Juneau

Board Members,

I support proposal 278.

It is grossly unfair to apply more personal use fishing restrictions to residents who are trying to efficiently catch fish for their personal use; while both resident and non resident commercial fishermen can catch unlimited numbers of fish for their personal use.

Resident and non resident commercial fishermen are allowed unlimited personal use catch that largely goes unreported.

5AAC 39.010 allows any commercial fisherman to retain fish for their personal use needs. There is no personal use permit required, no limits, and historically in SE, no reporting.

In some instances those fish are supposed to be self reported on fish tickets as catch not sold.

However; catch information received from "self" reporting is self serving and inaccurate.

I do not support adding more restrictions to the personal use fishing of resident commercial fishermen.

I do support finding ways to help other residents efficiently fulfill their personal use needs.

We all should be able to efficiently fulfill our personal use needs.

Mike Fox,
Juneau

Board Members,

I support proposal 279 with the following change.

Increase the Taku sockeye salmon daily and annual limit to equal the commercial fisherman personal use limits.

It is grossly unfair to apply personal use fishing restrictions to residents who are trying to efficiently catch fish for their personal use; while both resident and non resident commercial fishermen can catch unlimited numbers of fish for their personal use.

5AAC 39.010 allows any commercial fisherman to retain fish for their personal use needs. There is no personal use permit required, no limits, and historically in SE, no reporting.

I do not support adding more restrictions to the personal use fishing of resident commercial fishermen.

I do support providing an equal opportunity for residents to efficiently personal use fish.

We all should be able to efficiently fulfill our personal use needs.

Mike Fox,
Juneau

JAN 04 2011

BOARDS

Mr. Chairman and members of the Alaska State Board of Fisheries:

I know you are very busy and have many issues to revue so I will do my best to keep this written testimony brief. I am a salmon troller that currently lives and fishes out of the town of Sitka. I lived in Pelican during the 90s. I have been in the commercial fishing industry since 1984. I longline a little; I have a small amount of sablefish and halibut IFQ's that I bought in the 90s. I sat on the ATA board of directors for 15 years and retired last year. I make my living as a small time commercial fisherman in S.E. AK. I will comment on the troll issues that I consider the most important.

In general, I support the status quo on most things. I support the status quo on the S. E. AK king and coho salmon management plans. There are a few exceptions I will discuss. Proposals 311 and 313 seek to extend the coho season on each end of the season. I support these proposals providing the ADF&G are comfortable with them. In short, I defer to the ADF&G. Proposal 312 mandates a 10 day closure in August. I am absolutely opposed to this. I suggest the BOF council Leon Shaw and the ADF&G on this proposal. There is no significant relationship between the length of the August troll closure and the harvest rates by gillnet fishermen. The gillnet fisherman are only about 2% below their allocation level over the past 20 years and they far have more than made up for that on their harvest of hatchery fish. Trollers on the other hand have been well under their enhanced fish allocation for 15 of the past 18 years. I will deal with that issue later. The ADF&G should be granted the flexibility to chose the August troll closure length.

I would like to note proposal 310 witch asks that hatchery kings be counted off the count of the winter GHL of 45,000 kings. I could support this on two nonnegotiable conditions:

- 1) It occurs on years of high abundance, i.e. an abundance index that generates a S.E. AK total king salmon quota of 280K kings or more under the current king salmon treaty.

- 2) Those asking for this increase in the winter harvest must prove through data supplied by the ADF&G and S.E. hatchery organizations that there is a significant net benefit to the fishery and state economy through availability of AK hatchery fish during the winter months that might not be available otherwise. I fish the winter fishery but, I don't want to see any more shift of the troll king salmon out of the summer unless there is a very significant gain to be realized. I am skeptical that this proposal will generate a gain for anyone other than a couple of communities in S.E. AK (i.e. Sitka and Yakutat). The claim that a day of winter fishing is worth more than a day of summer king fishing is flimsy and unproven. The end of April, when these extra fish would be caught, tends to have similar exvessel prices to the August king opener. Further, FAS troll summer prices, regardless of when they are caught, are just as strong as the April iceboat exvessel price. Also, stripping more kings out of the summer has potential to increase the length of the August troll closure due to increase CNR (chinook non retention) days in the summer. The former head troll biologist, Bryon Lynch, stated this likelihood at the 2006 BOF meeting in Ketchikan. Part of the value of king salmon summer fishing days includes the cohos that are caught. Thus it is not just a simple comparison of exvessel king salmon prices. These extra kings will not be caught in Jan when the price is \$8 to \$10 dollars per pound. They will be caught in April if the fishery has reached its 45,000 king GHL before April 30. The winter fishery is all ready guaranteed 45K kings regardless of the abundance index generated quota. This is a very privileged position.

Still, the concept is worth studying, especially if it can be shown that a large amount of Alaska hatchery kings can be accessed that would not be otherwise.

I now turn my attention to the allocation of enhanced fish issue. This allocation of enhanced fish by value was established over 20 years ago for the commercial fisheries as a means for distributing the value of enhanced fish between the gear groups in S.E. AK. It was agreed on at the time that all enhanced fish, regardless of what hatchery produced them would be counted. The two regional associations (NSRAA and SSRAA) receive the funds generated from the aquaculture tax although they have played integral roles with some of the other hatchery establishments in providing funds and guidance on projects. Through out the history of the allocation agreement the troll sector has been running close to 10% below its allocation target. During this same period of time, one of the net fisheries has been significantly over. The allocation is a tricky thing to balance and I am not laying blame on anyone for this situation. However, there are a group of proposals that seek to address the allocation imbalance by augmenting troll access to enhanced fish in a variety of ways such as changing boundary lines, management prerogatives and opening schedules for specific areas. I support these proposals and will list them: 308(enforcement may nix this one), 314, 315, 316, 317, 319, 325, 326, 337, 341, 343, 344. Chum salmon play an essential role in making headway towards an allocation balance and should be recognized as major and necessary component of the troll fishery now and in the future. There are many old school people in the fleet, some who claim to represent the fleet, that fail to acknowledge the increasing importance of chum salmon to the troll fleet. That said, I support the maintenance of the sharing program and thus oppose proposals 323 and 324.

Thanks for the opportunity to testify. I hope you find this input useful.

J. Carter Hughes

F.V. Radio

C.O. Seafood Producers Coop.

507 Katlian St.

Sitka, AK 99835



October 28, 2011

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

RE: Request to remove Proposal 273 for further consideration at the 2012 Board of Fisheries

Dear Alaska Board of Fisheries,

I believe Proposal 273, submitted by the Southeast Herring Conservation Alliance, should be pulled from the proposal packet and should not be allowed to be even considered at the Alaska Board of Fisheries meeting in February 2012. This proposal is requesting a huge personnel effort and funding support from the Department of Fish and Game. The Alaska Board of Fisheries does not have authority on this matter, as the Board has no budgetary authority over the Department of Fish and Game.


Proposal 273 is requesting implementation of a permit system and a CREEL survey program that the Department of Fish and Game currently does not have. This proposal requests the Department of Fish and Game staff to conduct CREEL sampling at six harbors for subsistence herring eggs harvesting over an unspecified time period. Currently there is no staff at the Department of Fish and Game that does CREEL sampling for subsistence herring egg harvests. The Department of Fish and Game CREEL program is for sport-caught salmon not for subsistence herring egg harvesting. Proposal 273 states the Department of Fish and Game staff will measure, weigh, and record the data of subsistence herring eggs harvested. Again the Department of Fish and Game does not currently have staff to do any of these measures. First they would need to spend significant staff time to implement a permit system and develop a CREEL survey methodology. The department would then need to hire six CREEL samplers, provide training, purchase state certified scales (probably six to be at each harbor), expend many hours measuring – not sure how one would go about measuring herring egg harvests...then weigh the eggs, and record the data. Then the data would need to be sent to some Department of Fish and Game staff to be entered into a database. The data would need to be analyzed, the results would need to be interpreted, and a final report would need to be written, again there is currently no staff available for this. Additionally, the department would need to have permitting staff either hired or available to track permits, issue permits, and follow up on harvest data that is unreported. The subsistence salmon permits are a good example to compare with. The department spends significant time and funding to issue these permits and to follow up on the permits which have not been returned by November 10. Another example is in 2011, the Department of Fish and Game spent a lot of time and energy following up on over 10,000 subsistence halibut permits from 2010 that were not submitted by the due date of December 31, 2010.

The few staff the Department of Fish and Game has already is obligated to manage the Sitka Sound commercial herring sac roe fishery which usually occurs a few days before the subsistence herring egg harvest, but does overlap in duration. Approximately two weeks following the sac roe fishery, the Department of Fish and Game staff are quite busy conducting the herring spawn deposition surveys.

The current methodology the Department of Fish and Game uses to measure and quantify subsistence herring eggs harvesting is adequate. The Department has spent the last 2 years developing a more accurate survey instrument to document the subsistence herring egg harvests. For a budget of \$5,000, the harvest data is collected in the field via survey and the data is submitted to the department for analysis and interpretation. A final report is written by the department staff.

When asked who will suffer from Proposal 273, it really is the Department of Fish and Game staff and fiscal budget. The Alaska Board of Fisheries does not have authority on this matter, as the board has no budgetary authority over the Department of Fish and Game. Thus Proposal 273 should not be considered at the 2012 Board of Fisheries due to its budgetary nature.

Sincerely,



Heather Meuret-Woody
5 Maksoutoff Street
Sitka, AK 99835

October 12, 2011

Alaska Department of Fish and Game
PO Box 115526
Juneau, Alaska 99811-5526

To Whom It May Concern:

I have been coming to Alaska for sport fishing for the past 15 years and really enjoy the beautiful surroundings, local communities and the sport of fishing.

This year, as in the past years, I have booked a charter with a group of friends in July to enjoy salmon, halibut and shrimping for 4 days. Our group was ready to catch the "big one" then we found out that the halibut regulations were changed for charter boats. It went from being able to catch 2 halibuts down to 1 halibut under 37". This regulation was changed after we had booked the charter and airline tickets. We all agreed since we were there for only limited days of fishing that to target that small of halibut would not be worth it.

This has happened more than once. Several years ago the halibut regulations were changed from one halibut any size and one halibut under 32 inches. The king salmon regulations changed by regulating the size and the number of fish you could keep. The cost of this trip for 4 is over \$15,000.00 for the charter, motels, airline tickets and food. This is a boost to the Wrangell economy and would like to continue to do so, however it is disappointing when you expect to get fish and then the regulations are changed after we book the trip.

We were only able to catch salmon and shrimp and to everyone's disappointment "no" halibut. I truly feel that rules are important to regulate fishing however I feel this change was not good for the charters and definitely our group was not happy.

I feel that changes need to be beneficial to sustain the livelihood of the local charters and that there is a compromise that would help all.

Sincerely,


Bill Goodman

Kim Elliot
7 Maksoutoff Street, Sitka, Alaska 99835
(907) 747-7677 or (907) 738-0748
Email: kelliot@gei.net

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

February 8, 2012

TOTAL OF 42 PAGES

Introduction: I was raised on various islands in Sitka Sound in the early 1960's and have been a resident of Sitka the majority of my life. I have worked a variety of marine related jobs to include: as troll fish deckhand; for ADF&G in Craig the 1970's as a fish tech collecting tagged salmon data; as a herring roe technician during a sac roe fishery and on a 150' herring sac roe fishery processor in the 1980's; for NSRAA tagging salmon at Deer Lake and for NOAA at Little Port Walter helping with research studying the effects of oil spills on salmon spawn both in the 1990's; I hold a 100 ton US Coast Guard license with a towing endorsement and served as a Naturalist and Captain for Allen Marine in Sitka as well as a charter fishing captain with my own business. I am now semi-retired. In our retirement I look forward to serving as deckhand for my husband who has recently acquired a hand troll permit. I have lived a subsistence lifestyle my entire life and am intimately familiar with Sitka Sound. I hope this will give some weight to my words as I submit my comments to you.

I must note that I am also a new member of the Sitka Fish & Game Advisory Committee however I was not involved in the decision making of that body until January of 2012 so these comments are on my own behalf. I disclose this in the event you see my name in some committee minutes as I do not wish there to be any conflict seen in my community.

PROPOSAL 307 – I SUPPORT this proposal. I have done my share of hard manual labor over the years which resulted in injuries to my shoulder joints that would make cranking the heavier weight used for hand troll gurdies very difficult for me. Hand-powered downriggers use much lighter weight and carry a maximum of 2 rod/reel with 2 hooks per downrigger in the winter fishery as opposed to the other allowed gurdies which can host multiple leaders/hooks and allow for a much greater catch. I do not believe that this proposal will threaten the power troller catch or increase the hand troll ability to catch fish. It simply allows for older folks or those with injuries that don't want to completely give up fishing to be able to continue a few more years without being forced to go to the power troll level. I have used power downriggers when I was operating a charter vessel and unless I had one person for every rod/line in the water things could get pretty wild and I didn't have to crank up those downriggers by hand! This is not a completely new regulation it just extends it from winter only, to spring and summer as well. This is a permitted fishery so there won't be any additional boats. There are many more arguments to support this change but I have given you the most important. I hope you will respond favorably.

PROPOSAL 195 – I SUPPORT this proposal. My recent experience trying to gather abalone in Sitka Sound has met with dismal failure where I used to be able to find a few 10 years ago. I don't think this goes far enough. **Any sort of diving should not be allowed!** The other major problem is the influx of sea otters into Sitka Sound. They certainly are not threatened here and

have virtually wiped out the abalone and sea urchins between Sitka and Redoubt where I usually gather.

PROPOSAL 230 – I SUPPORT this proposal. After hearing comments from Fish & Game personnel that indicate a need for more information in discussions about the Sitka herring population I support the absolutely valid comments made within the proposal to add additional requirements prior to consideration of a commercial fishery for herring in Section 13A and 13B.

PROPOSAL 231 – I SUPPORT this proposal. I feel that this fishery should be held to its GHLL. Going over it 60% of the time is unacceptable and must be addressed. Particularly in view of the 33% increased GHLL for 2012. I cannot help but feel it is wiser to err on the side of caution.

PROPOSAL 232 – I SUPPORT this proposal. Other areas of Southeast have seen their herring populations decline even with their lower harvest rate. Sitka should not have a higher harvest percentage than elsewhere. A Sitka biologist raised the sac roe GHLL 33% for Sitka this year yet I heard him say that although they do everything they can to have an accurate model that he cannot guarantee their forecasts. Again I urge you err on the side of caution and support this proposal.

PROPOSAL 233 & 234 – I ask that you OPPOSE both of these similar proposals. I used to think that this would be a good idea as I thought it would be better for the herring population. I no longer think that is so. As the fishery is now operated they have to open areas that allow all the boats to access herring. Changing to a cooperative fishery would enable them to wait until the very last minute before herring spawn close in to shore and I believe this would disrupt the spawn.

They could also have fewer boats out there but much more time to find the premium schools of herring. I know that even when out in a small boat the herring move away from a boat to continue their spawning. This wild fishery is the problem of the fishermen/captains that often ignore the “rules of the road.” I do not believe it will result as stated in the proposal “a better managed fishery that is responsive to potential conservation concerns as well as to a more stable and robust subsistence fishery.”

PROPOSAL 273 – I OPPOSE this proposal. I personally harvest herring eggs and use them. I always get a permit to harvest the herring roe on kelp and ADF&G has trusted my reporting just as they do for my subsistence salmon permit report. I ALWAYS report the amount of eggs I gather as does everyone I’ve ever discussed the issue with. We (my family and I) harvest carefully only taking what branches we will use and leave the rest of the branches in the water for the thinner egg layers to hatch. We put ours into coolers and/or plastic bags out on the grounds to protect them until we package them. To have our eggs weighed upon arrival at the dock will require additional handling that will damage the eggs. If they are weighed in the coolers they will be adding the weight of the cooler and water that they are transported in. I have family I send eggs (50 lb. boxes) to every year and I have a very accurate idea of how many eggs I harvest. In the last 10 years there have been several years where we were unable to gather our own eggs as they did not spawn in an area where we could get to them or it was an area where the surge made them full of sand. Sometimes they spawned so thin we did not take them. This is all in the core area referred to in Proposal 238 & 239 (see my additional comments and diagrams on those below).

PROPOSAL 238 and/or 239– I ask that you SUPPORT and pass one of these proposals.

Both of these proposals have been well thought out and have very valid comments. They supported virtually the same area to be closed to commercial fishing. I believe Proposal 238 submitted by the Sitka Advisory Committee failed with a tied vote. I think if the Committee had been aware of the 33% increase in GHL which was announced a few weeks later it could have changed the outcome to support proposal 238 and/or 239. The increased GHL will virtually guarantee the fishery will have to take place in the area most important to the subsistence herring egg gatherers and very possibly to the health of the Sitka herring population. Attached to these comments you will find a diagram (**Addendum A – page 4**) of the approximate area in Sitka Sound where the closed area is proposed. I would also support any adjustments to the suggested closed area that you would deem appropriate. I do think it is crucial that some part of that area be protected for more than just subsistence reasons which I will address in the next paragraph. I have attached AFD&G diagrams (**Addendum B – pages 5-15**) showing the last 10 years of Sitka Sound Herring Spawn. On the diagram for 2011 I have marked the approximate closure area.

Aside from the obvious benefits to the subsistence gatherers and the health of the herring population which I support, there is another issue of **grave** importance. In June, 2010, the highly invasive tunicate *Didemnum vexillum* (Dvex) was found in Sitka Sound's Whiting Harbor and is continuing to spread. October 22, 2011, a portion of the aquafarm facility in Whiting Harbor infested with Dvex broke loose in a storm and went out into Sitka Sound and broke up on the rocks in the Western Channel area. Whiting Harbor is located within the proposed area that would be closed to any commercial herring fishery in Sitka and it identified on both **Addendum A & B**. Since I have first learned about the Dvex the more I have learned about it and the more certain I am that this is a huge threat to Sitka's marine environment (**see Addendum C – pages 16 - 23**).

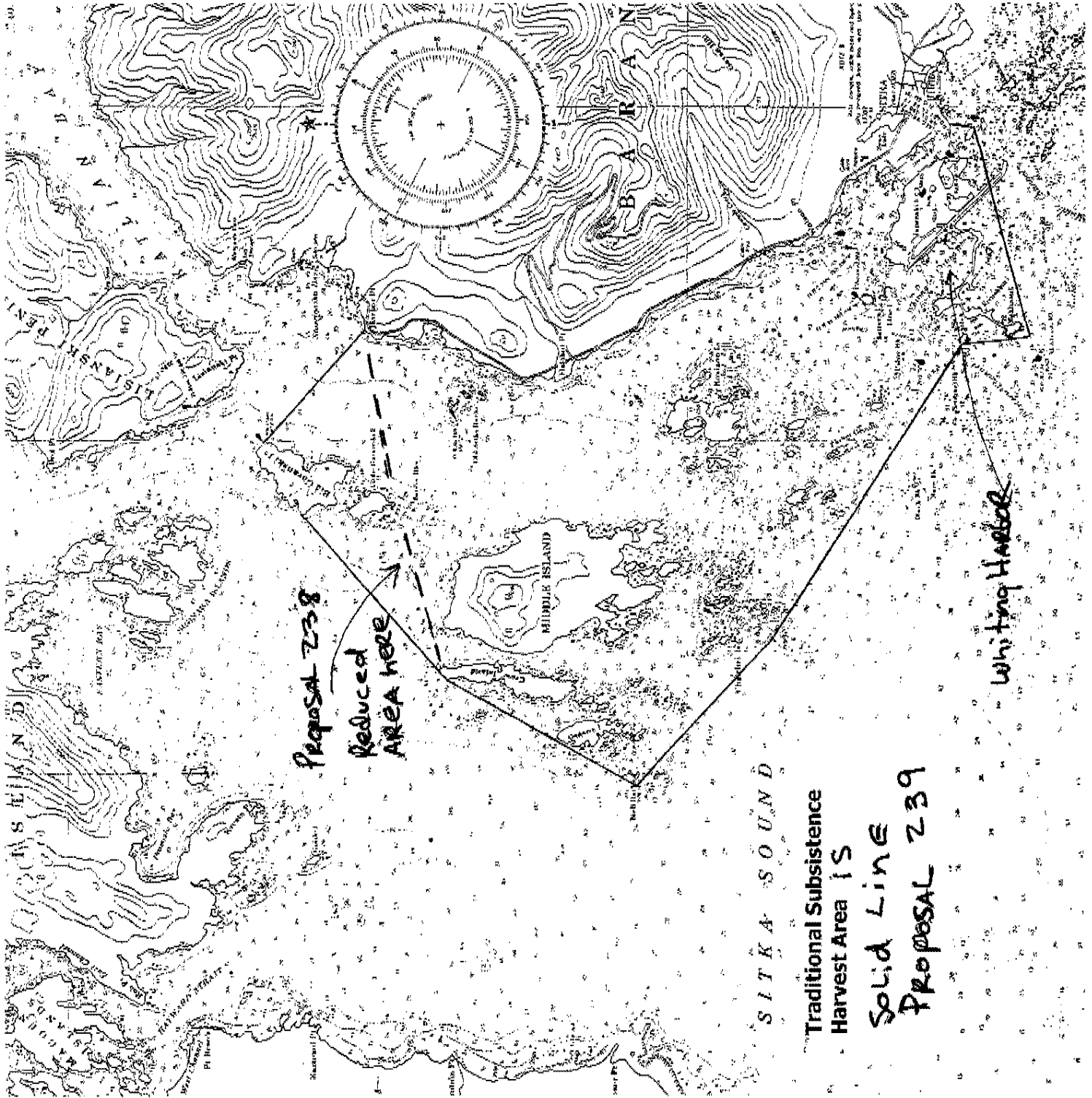
I believe it is crucial that no fishing be allowed in this area that could aid the spread of the Dvex into the rest of Sitka Sound. I became even more convinced after seeing a presentation made January 23, 2012 to the House Resource Committee in Juneau by Marnie Chapman, University of Alaska Southeast – Sitka Campus (**Addendum D – pages 26-42**).

It is my suggestion that at the very least that one of these proposals be implemented for a few years so there is time to further survey the area for Dvex infestation. The current problem that has prohibited the complete removal of the Dvex infested floats is the lack of available funding. It does appear that the Governor has put some funds into his budget but they still won't be available until well after the 2012 Sitka sac roe fishery.

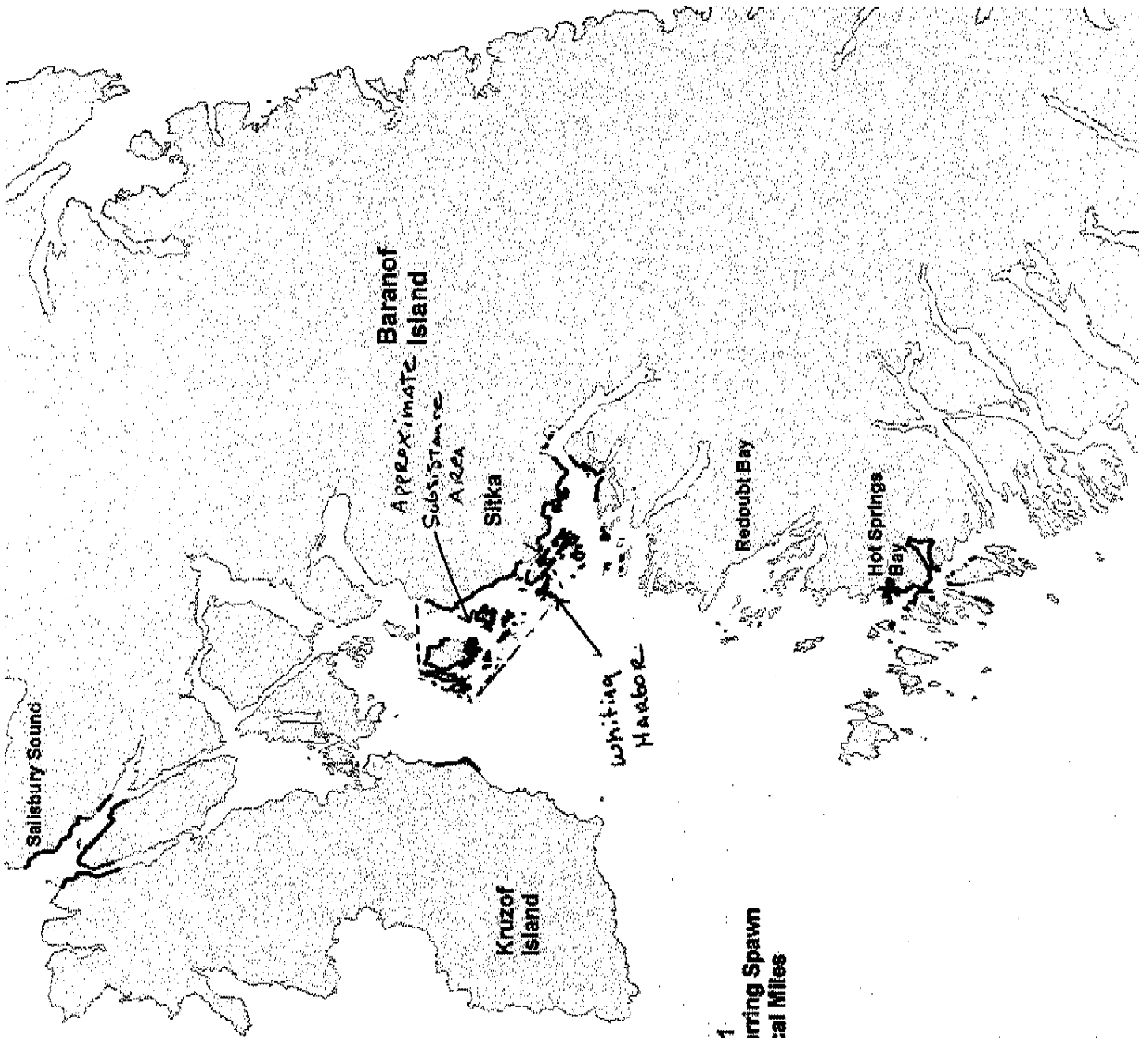
I regret that I am unable to present my comments in person at the upcoming Ketchikan meetings. I appreciate the difficult decisions you are going to be making during these meetings and know you will hear many wise comments. I hope you will give my comments serious consideration and find that you can support my view.

Thank you,

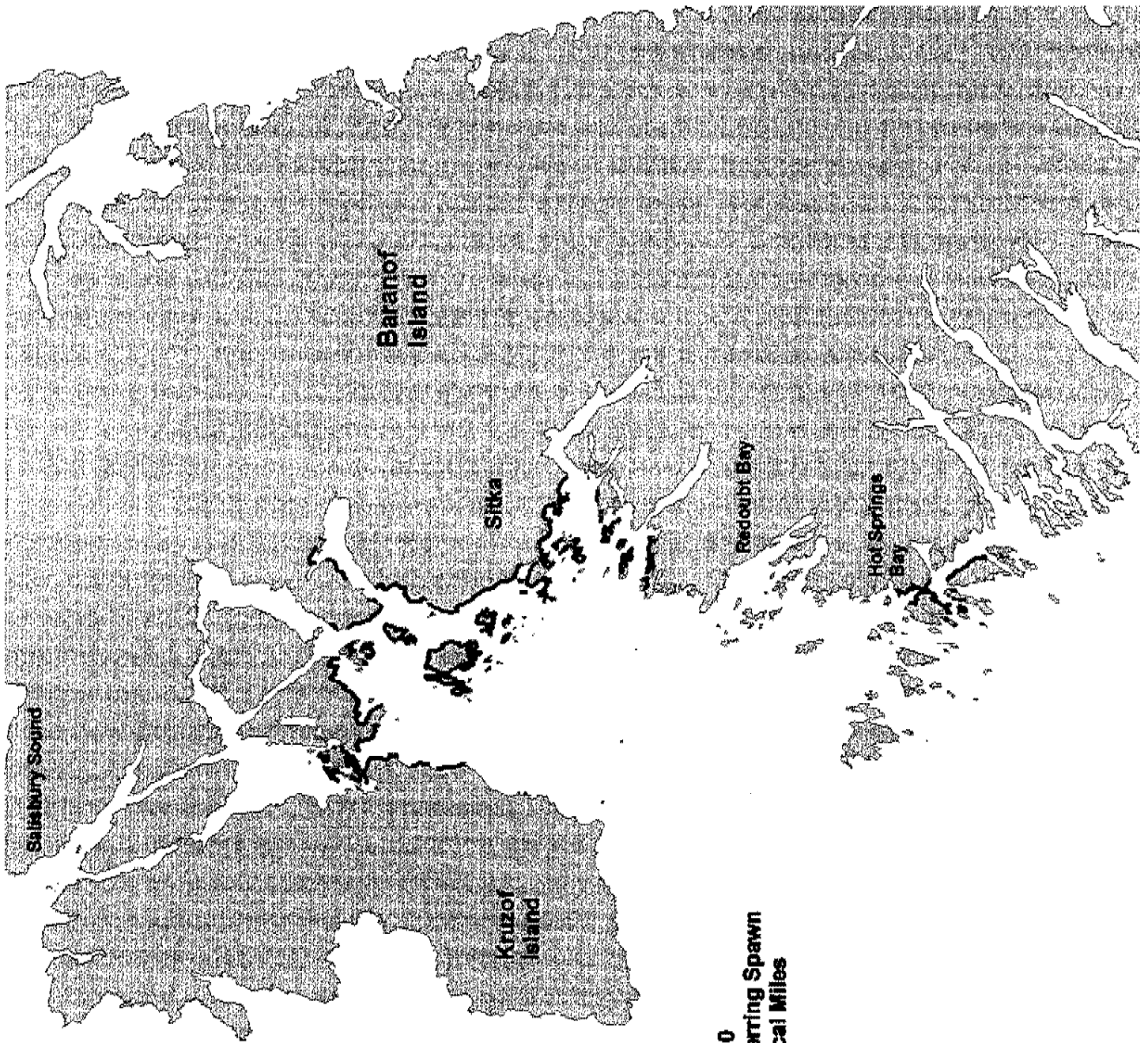
Kim Elliot
7 Maksoutoff Street, Sitka, AK 99835



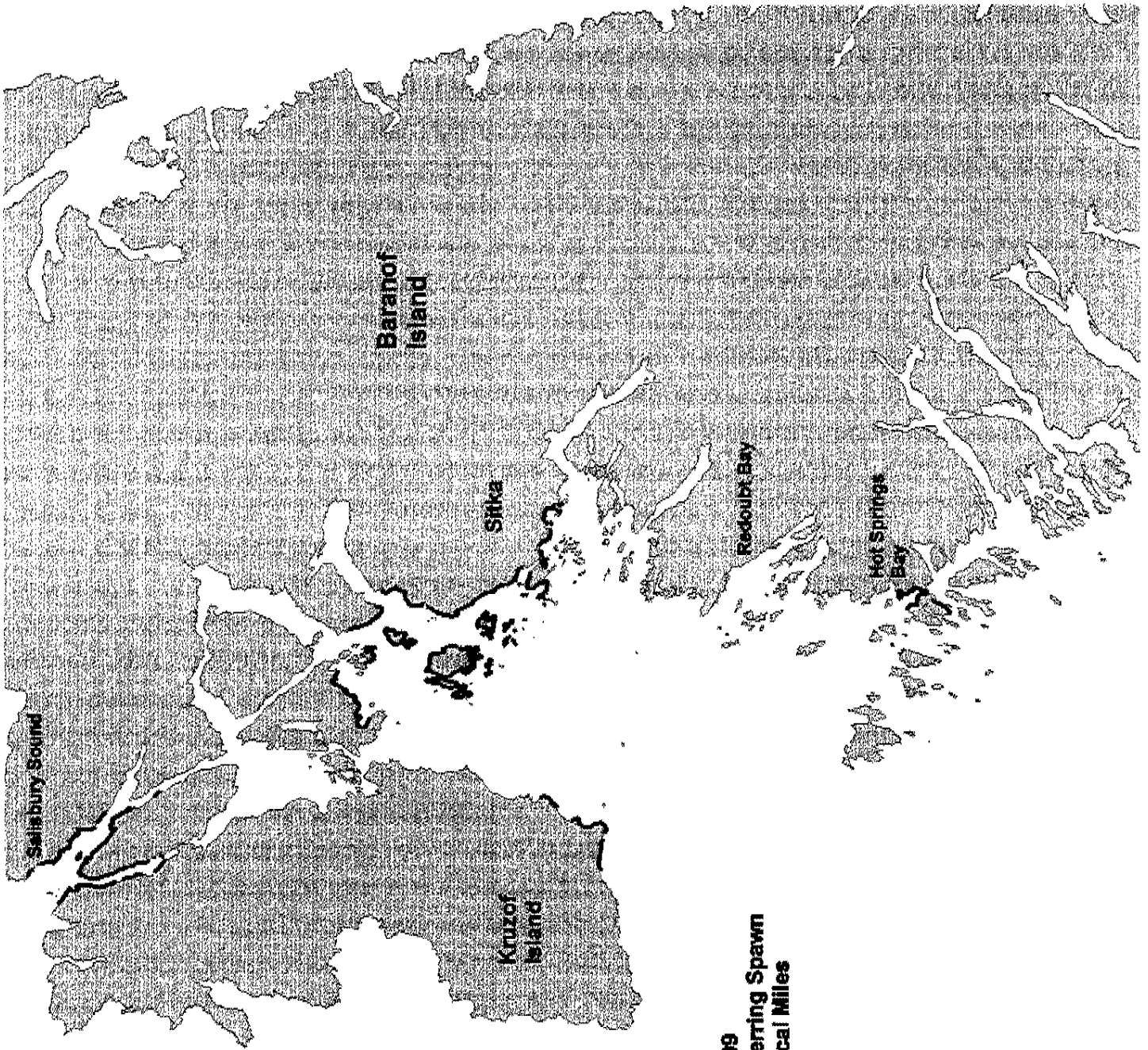
Addendum A



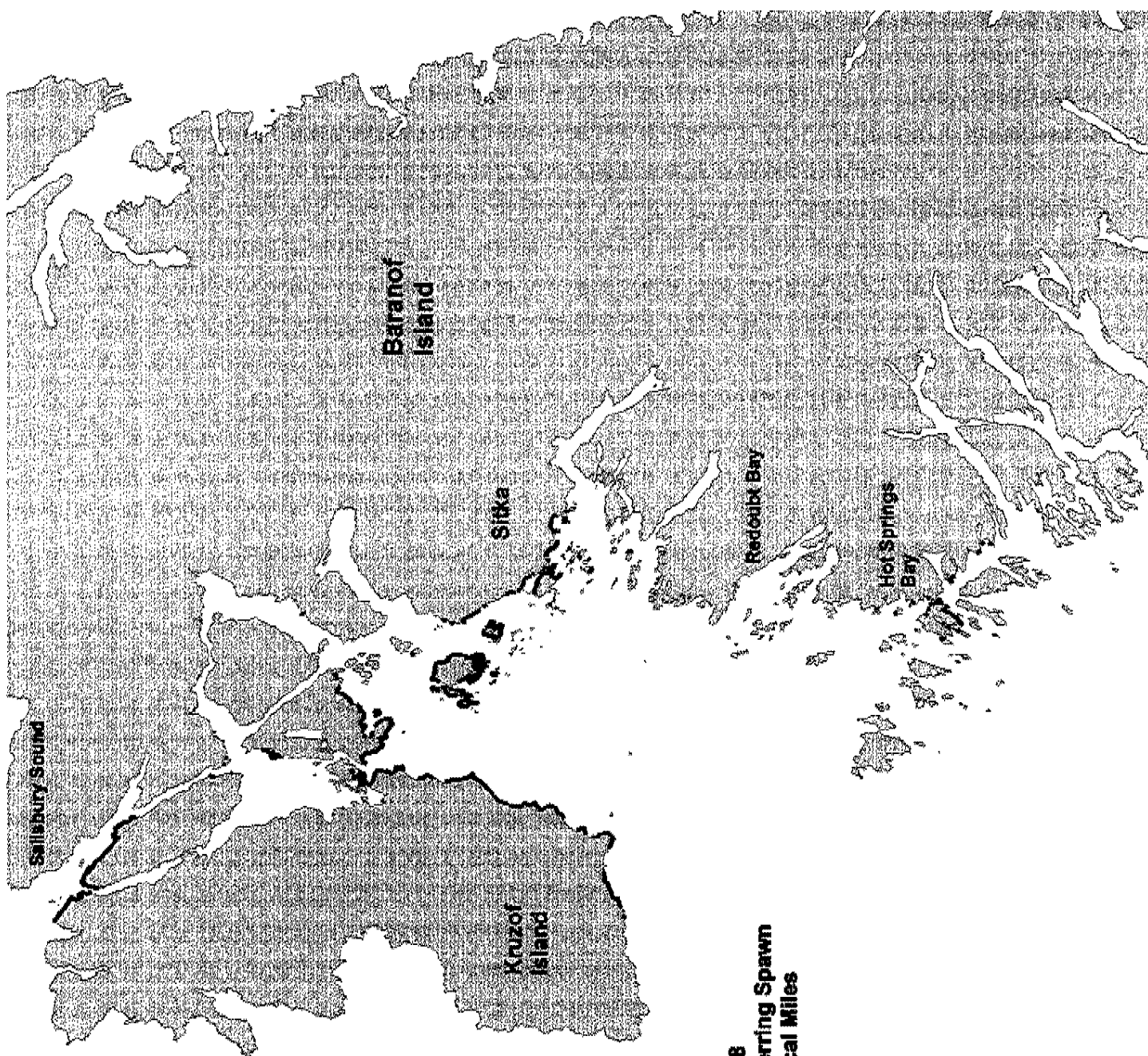
2011
Sitka Sound Herring Spawn
78.3 Nautical Miles



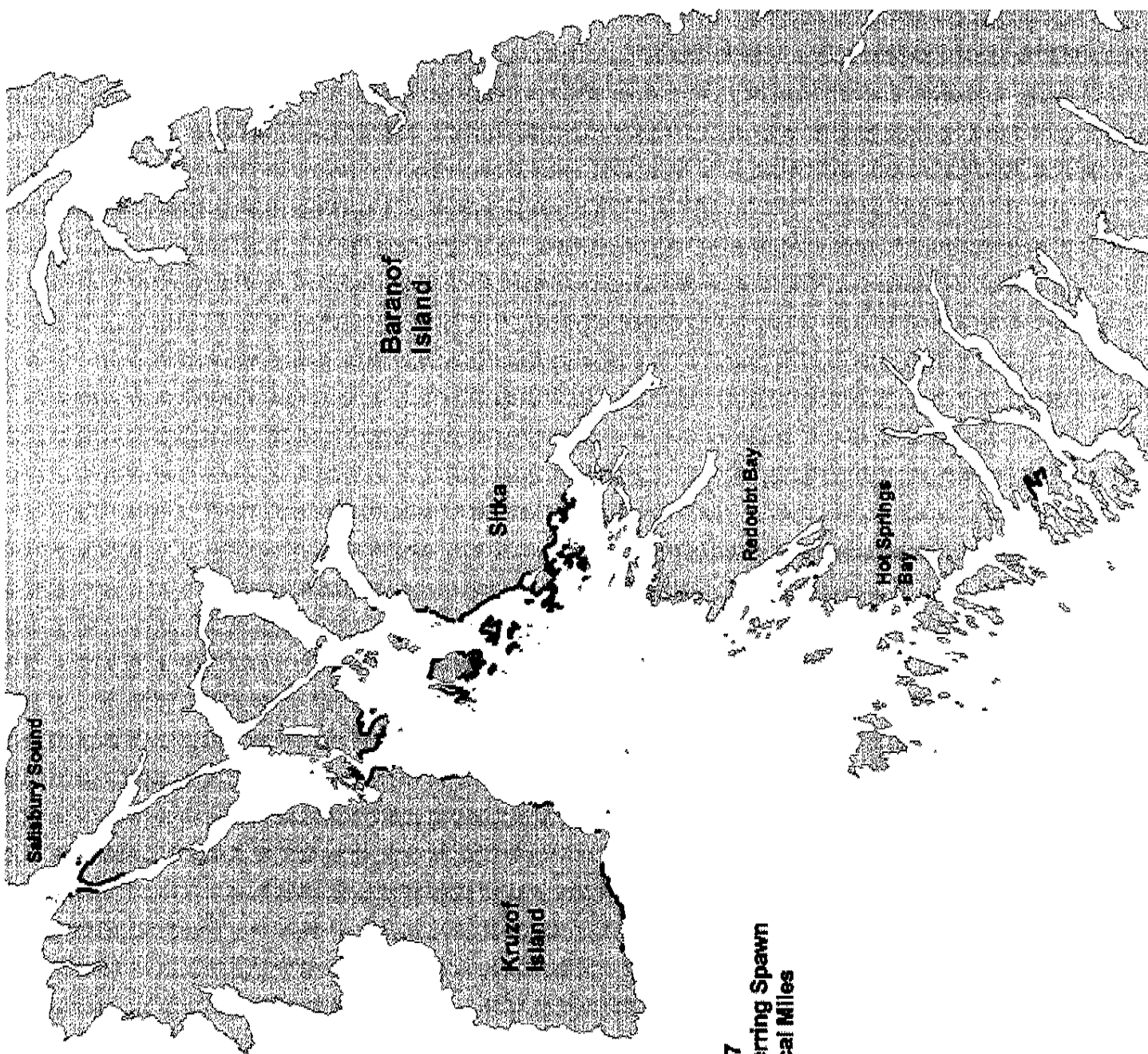
2010
Sitka Sound Herring Spawn
87.7 Nautical Miles

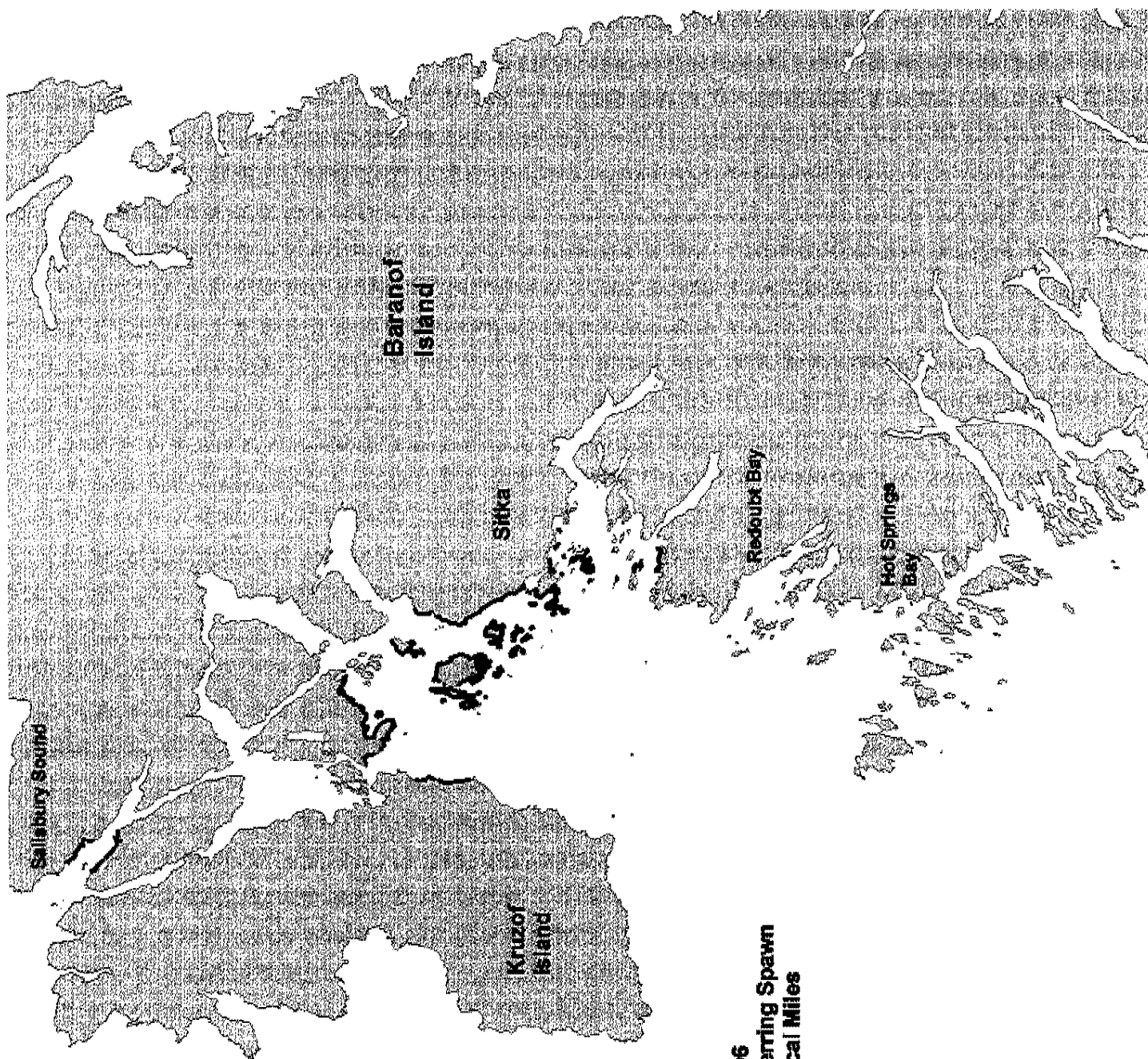


2009
Sitka Sound Herring Spawn
65.6 Nautical Miles

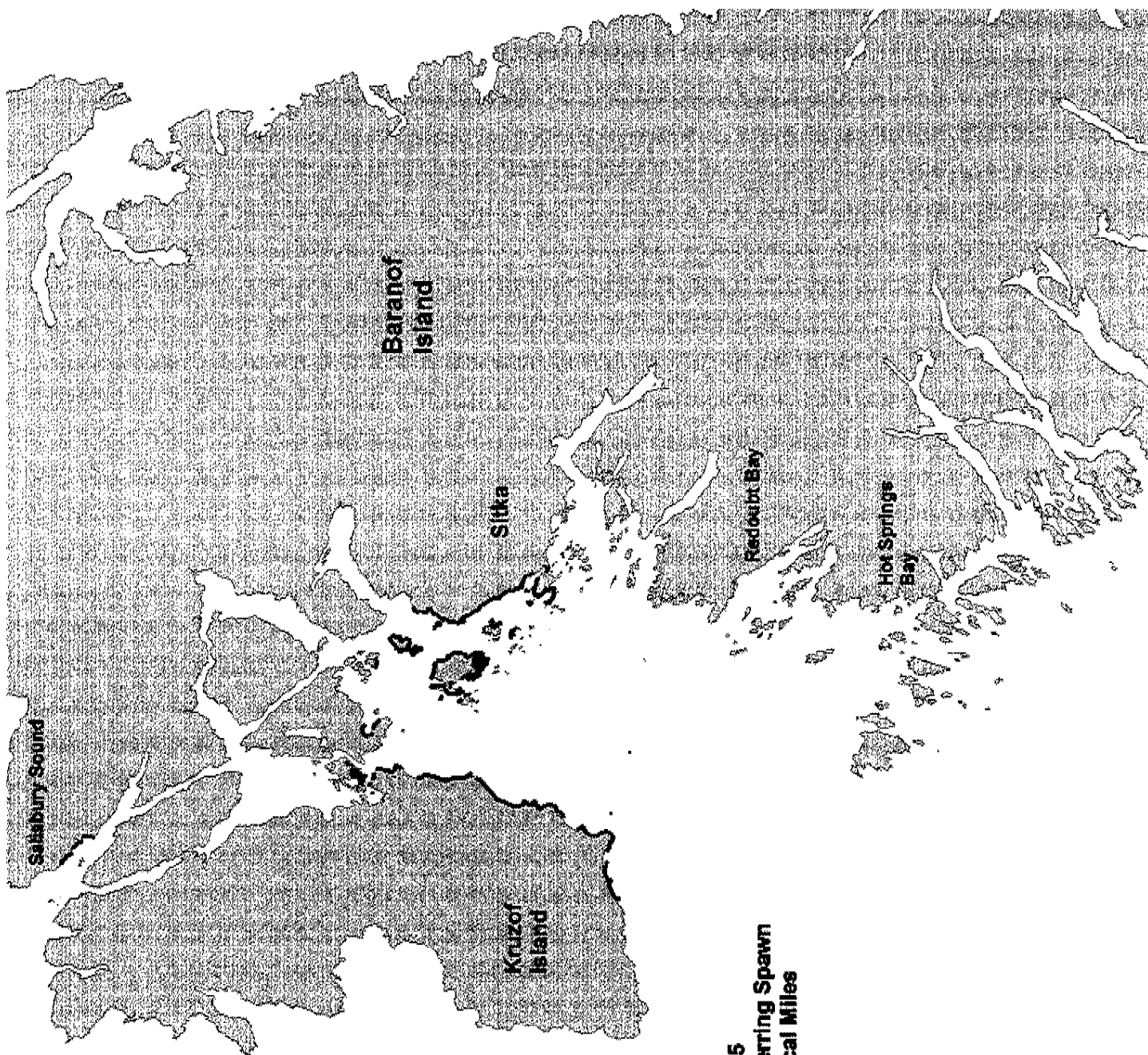


2008
Sitka Sound Herring Spawn
55.3 Nautical Miles

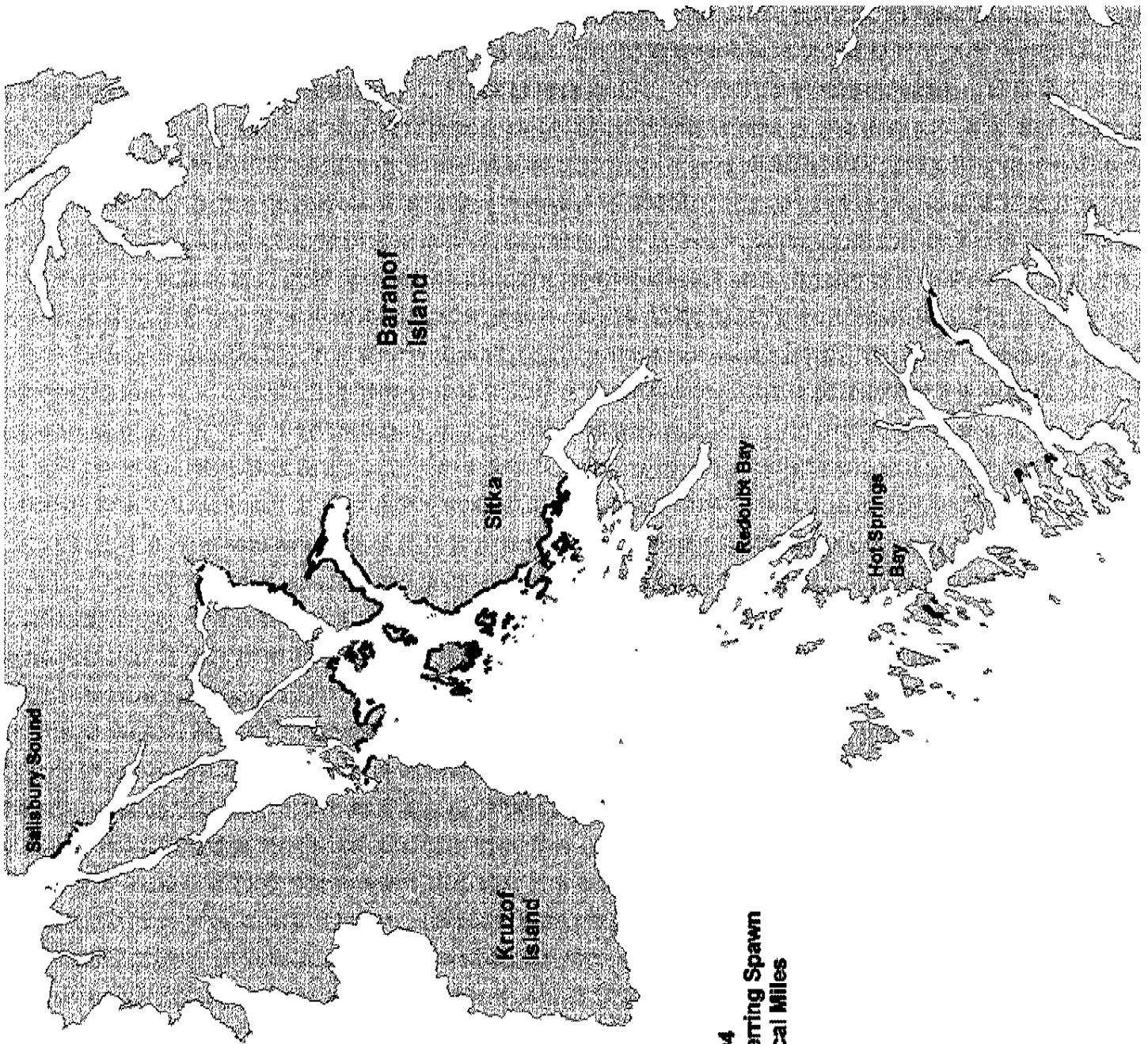




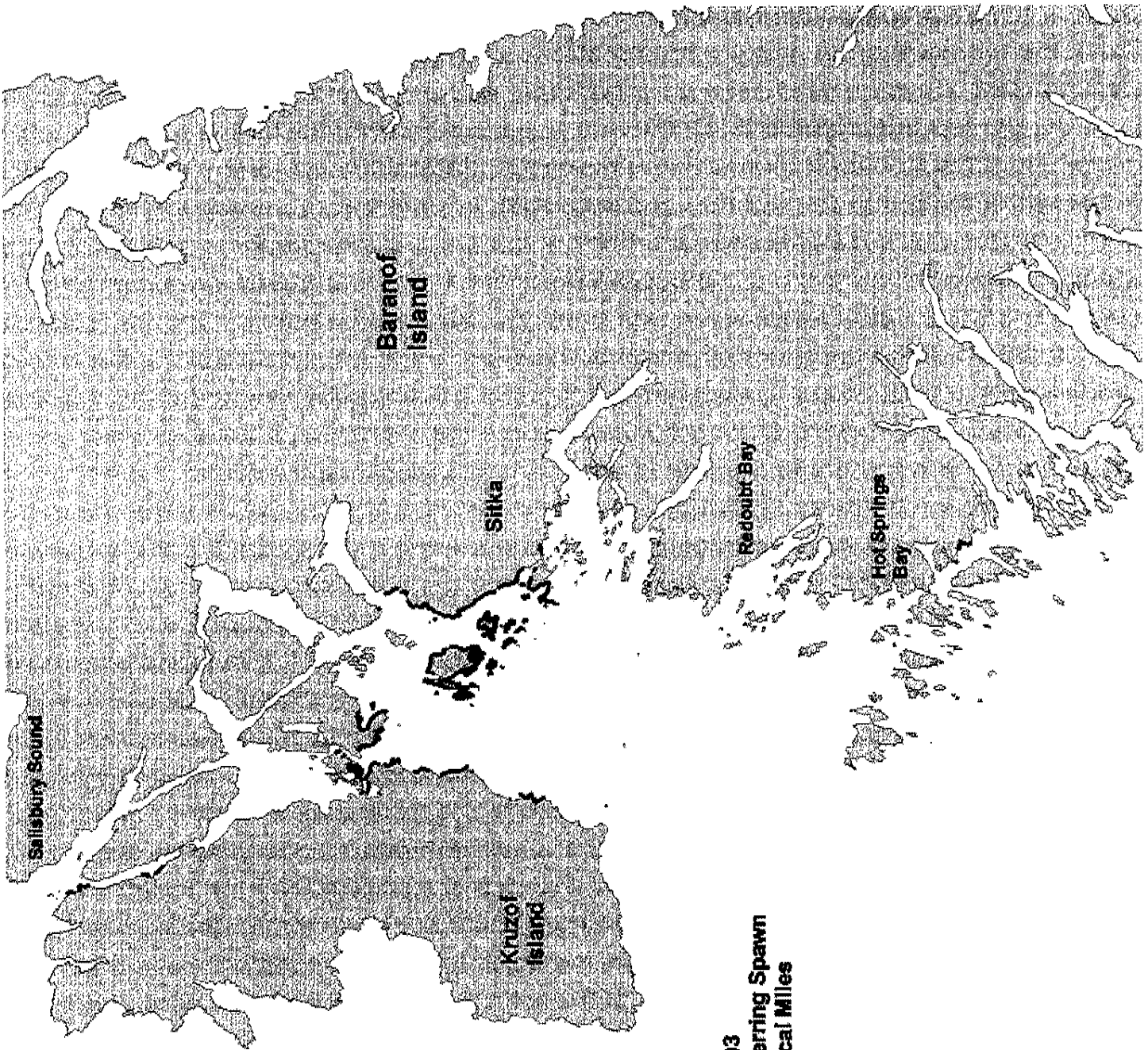
2006
Sitka Sound Herring Spawn
57.4 Nautical Miles



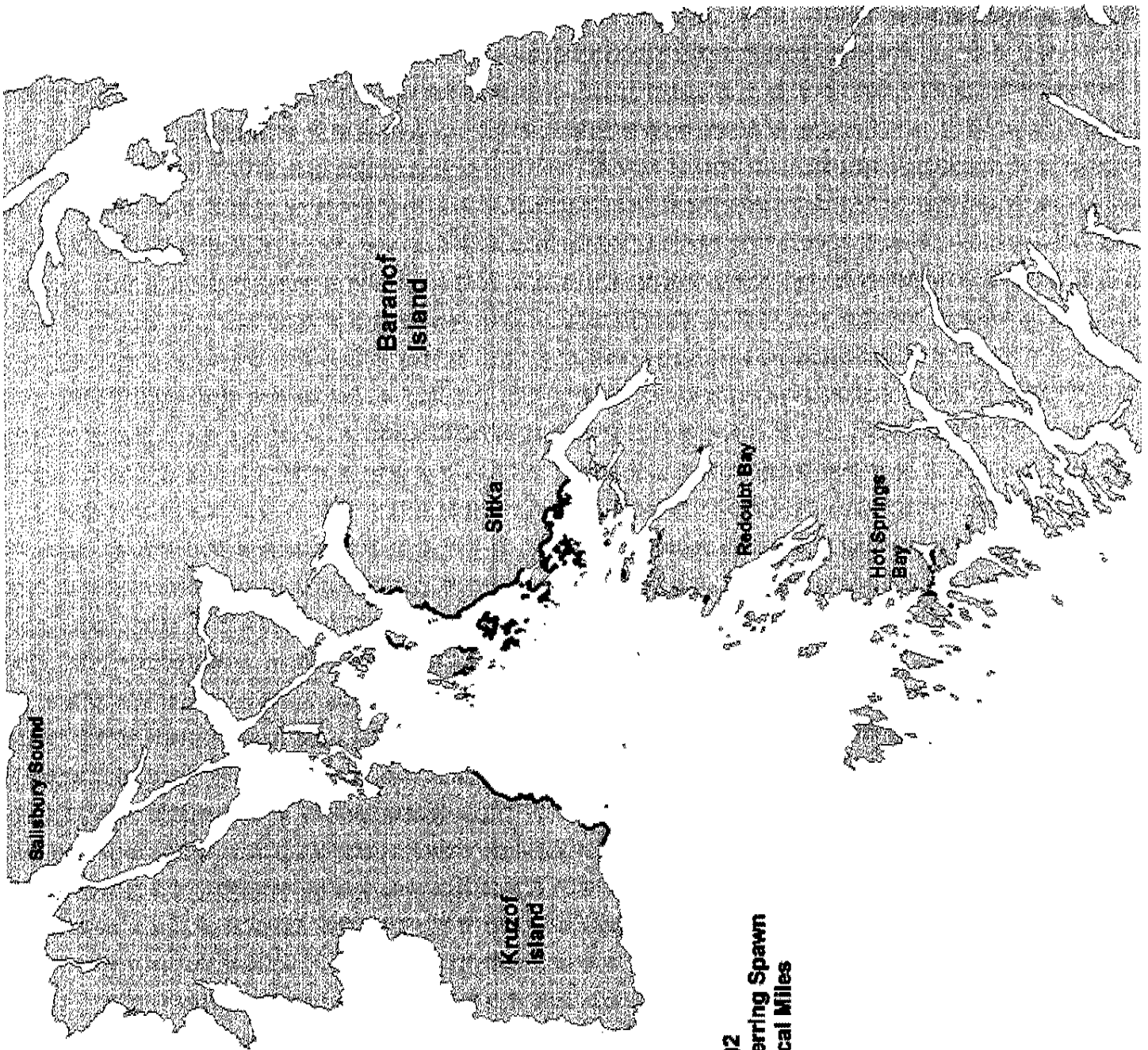
2005
Sitka Sound Herring Spawn
39.5 Nautical Miles



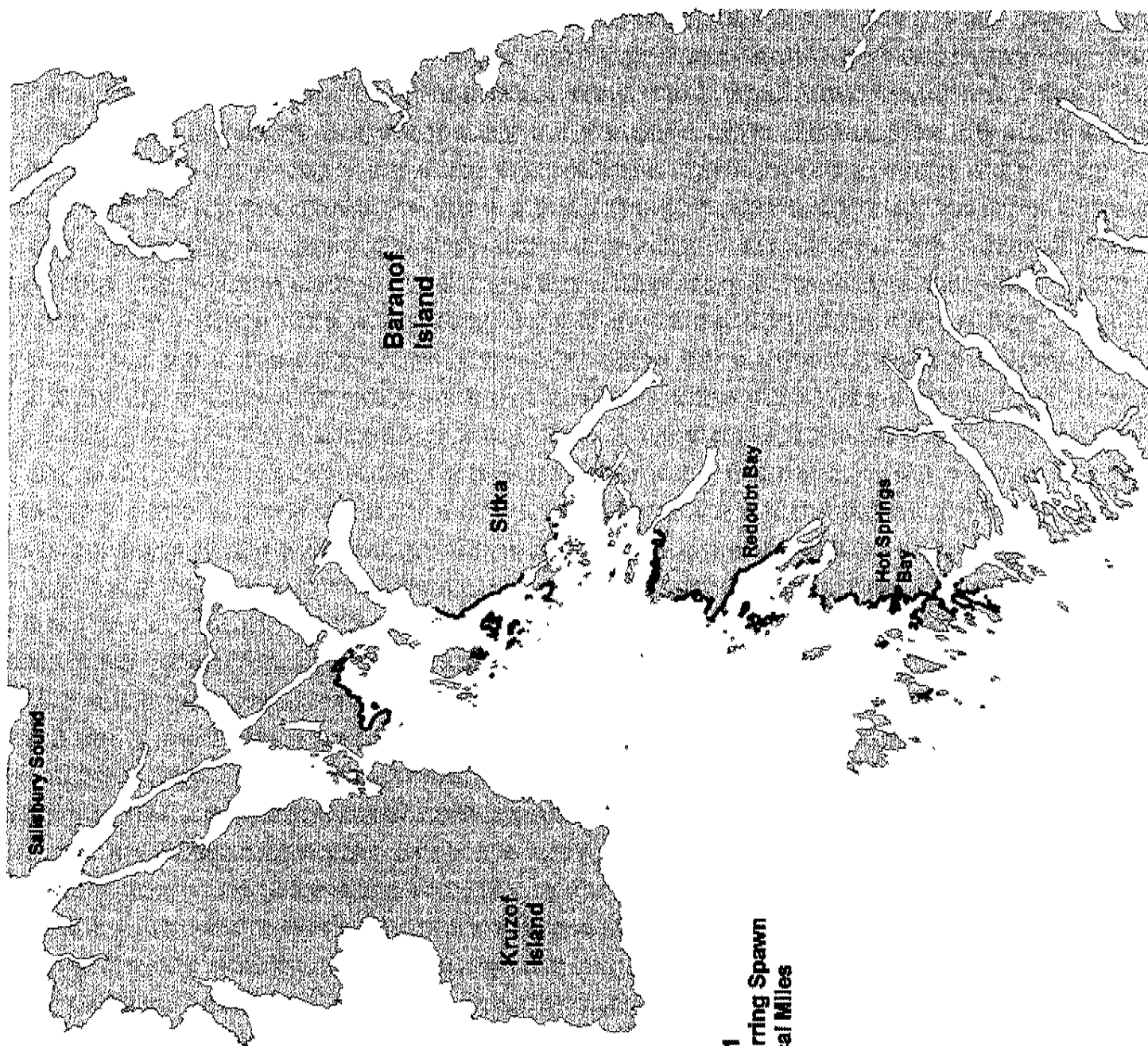
2004
Sitka Sound Herring Spawn
79.8 Nautical Miles



2003
Sitka Sound Herring Spawn
47.1 Nautical Miles



2002
Sitka Sound Herring Spawn
42.6 Nautical Miles



2001
Sitka Sound Herring Spawn
61.0 Nautical Miles

Email Correspondence February 7 & 8, 2012 between Kim Elliot and several biologists involved in Whiting Harbor Dvex discovery regarding possible effects of Dvex on herring spawn areas.

From: kim [mailto:kelliot@gci.net]
Sent: Tuesday, February 07, 2012 3:59 PM
To: Heather Woody (bwoodyham@gmail.com)
Subject: Dvex/herring

Hi Heather – I'm writing comments to the board of fish and was wondering if you saw anything that would make you think that herring won't be able to spawn on Dvex?

Kim Elliot
7 Maksoutoff Street
Sitka, AK 99835-7556
(907) 747-7677
email: kelliot@gci.net

From: bwoody ham [mailto:bwoodyham@gmail.com]
Sent: Tuesday, February 07, 2012 4:43 PM
To: kim
Cc: tammy.davis@alaska.gov; Linda.Shaw@noaa.gov
Subject: Re: Dvex/herring

ADF&G staff Tammy Davis (D. Vex contact) noted that no herring eggs were observed on D. Vex covered substrate during the 2011 herring spawn in Whiting Harbor.

I copied her on this email. Tammy may be able to provide you with more information. This is one of the major concerns from Tammy and Linda Shaw (NOAA Habitat) - D. Vex may displace herring spawning activities. I also copied Linda on this email.

Heather

From: kim [mailto:kelliot@gci.net]
Sent: Wednesday, February 08, 2012 9:19 AM
To: 'Linda Shaw'; 'bwoody ham'
Cc: 'tammy.davis@alaska.gov'
Subject: RE: Dvex/herring

Do you have anything I could add to define your concerns about how Dvex might affect the herring? Does it grow on the seaweeds that the herring spawn on along the shore? I couldn't tell from the photos. Thanks for any additional comments you might have.

Kim

From: bwoody ham [mailto:bwoodyham@gmail.com]
To: kim
Cc: Linda Shaw; tammy.davis@alaska.gov; Sarah Cohen; Marnie D Chapman; McCann, Linda
Subject: Re: Dvex/herring

Yes it grows on all seaweed and eel grass and any other substrates that herring spawn on, including bare rock. And while it grows on all of these living substrates, it slowly kills them by smothering and engulfing. Hopefully Sarah will have more on the toxicity.

Heather

From: Linda Shaw [mailto:linda.shaw@noaa.gov]
Sent: Wednesday, February 08, 2012 9:59 AM
To: bwoody ham
Cc: kim; tammy.davis@alaska.gov; Sarah Cohen; Marnie D Chapman; McCann, Linda
Subject: Re: Dvex/herring

Hi - the link below connects to a paper that talks about Dvex acidity as it relates to scallop settlement in Georges Banks....

<http://www.thegreenblue.org.uk/pdf/z%201341.%20Impact%20of%20the%20invasive%20colonial%20tunicate%20Didemnum%20vexillum.pdf> * **NOTE: REABIC – Aquatic Invasions (2009) Volume 4, Issue 1:207-211 attached to these emails (Addendum C1)**

From: McCann, Linda [mailto:mccannl@si.edu]
Sent: Wednesday, February 08, 2012 10:33 AM
To: kim; 'Linda Shaw'; 'bwoody ham'
Cc: tammy.davis@alaska.gov; 'Sarah Cohen'; 'Marnie D Chapman'
Subject: RE: Dvex/herring

Hi Kim,
Linda S. summed up the concerns about D vex. I support any efforts to prevent potential spread of D vex and to get funding for surveys in the areas where debris from the farm has washed up, particularly those that are critical to the herring fishery. Currently, there is no funding in place for such surveys which could provide critical information. Thanks for taking up this issue!

Platewatch Monitoring Coordinator
Linda McCann
SERC c/o Romberg Tiburon Center
3152 Paradise Dr.
Tiburon, CA 94920
415 435 3528 office
415 488 6270 home

From: kelliott@gci.net [kelliott@gci.net]
Sent: Wednesday, February 08, 2012 2:14 PM
To: 'Linda Shaw'; 'bwoody ham'
Cc: tammy.davis@alaska.gov; 'Sarah Cohen'; 'Marnie D Chapman'; McCann, Linda
Subject: RE: Dvex/herring

Thanks to all! I don't know if any of you actually ended up with the letters written by the Sitka Fish & Game Advisory Committee but I did take copies of the Balsinger Brief document and the Council Didemnum notice Linda emailed me along with a couple of model letters I wrote to their meeting in December and they supported and sent letters to all involved agencies and representative including the Governor with a copy of those documents to include the Alaska Board of Fish. The Advisory Committee had already seen the one on finding Dvex in Sitka.

I am proposing to the State Board of Fish (and want to include paper copy of the presentation Marnie Chapman made to the House Resource Committee on 1/23/12 to update them) that because Dvex infested materials were blown toward the core of the herring spawning area that they consider approving one of two proposals that will be brought before them at the end of this month. Both those proposals include closure of the commercial herring fishery in order to provide an area only open for subsistence. Proposal 238 was submitted by the Sitka Advisory Committee and failed by a 7 for 7 against vote which is unfortunate. Proposal 239 was submitted by Harvey Kitka on behalf of the Sitka Tribe Herring Committee and it also failed by a small margin. Most unfortunate was that this all happened before the Committee knew of the 33% increase in GHF for the herring sac roe harvest AND before I could tell them that parts of the infested docks had escaped during the October 2011 storm into that same area they had proposed to be closed. I really think it is likely the Committee would have been more supportive of these proposals had they been fully informed. It is likely that there are areas particularly between Whiting Harbor, the

Apple Islands, Kasiana Island, Middle Island, Crow Island and over to Halibut Point Road shoreline where the Dvex infested materials landed and now could be spread by the fishery seine nets to other parts of Sitka Sound as well as to packers that could then carry it to other ports in Alaska and British Columbia. I believe before net fisheries are allowed into this area there needs to be time allowed to thoroughly survey the area this coming summer.

I would ask if any of you have objection to my making this email an attachment to my comments to the Board of Fish.

Thank you.

Kim

From: Linda Shaw [mailto:linda.shaw@noaa.gov]

Sent: Wednesday, February 08, 2012 10:23 AM

To: kim

Cc: bwoody ham; tammy.davis@alaska.gov; Sarah Cohen; Marnie D Chapman; McCann, Linda

Subject: Re: Dvex/herring

Thank you for the update Kim. I have no objection to your use of these emails as attachments to comments to the Board of Fish. Linda

From: Linda Shaw [mailto:linda.shaw@noaa.gov]

Sent: Wednesday, February 08, 2012 10:29 AM

To: Davis, Tammy J (DFG)

Cc: kim; bwoody ham; Marnie Chapman; McCann, Linda; Sarah Cohen

Subject: Re: Dvex/herring

Yes, Tammy makes a good point - Marnie had been working on ideas for experiments to see what actually happens to herring eggs on D. vex. It would be great to do those. Linda

From: Davis, Tammy J (DFG) [mailto:tammy.davis@alaska.gov]

Sent: Wednesday, February 08, 2012 10:25 AM

To: Linda Shaw; kim

Cc: bwoody ham; Marnie Chapman; McCann, Linda; Sarah Cohen

Subject: RE: Dvex/herring

Hello Kim,

Thanks, Linda for expanding the cc: list.

I concur with what Linda Shaw states below. The one caveat is that to our knowledge no research has been done to confirm or deny any interactions between D. vex and herring, herring egg deposition. To understand potential impacts to the sac roe fishery, a better understanding of potential interactions would be necessary.

Thanks for your interest-

Tammy

TAMMY DAVIS / INVASIVE SPECIES PROGRAM, LEAD

ADF&G /P.O. Box 115526 / JUNEAU, AK 99811-5526

P: (907) 465-6183 / 1-877-INVASIV / C: (907) 209-2492

From: Linda Shaw [mailto:linda.shaw@noaa.gov]

Sent: Wednesday, February 08, 2012 9:28 AM

To: kim

Cc: bwoody ham; Davis, Tammy J (DFG); Marnie Chapman; McCann, Linda; Sarah Cohen

Subject: Re: Dvex/herring

Hi Kim,

Yes, it will grow on seaweed and just about anything else except fine sediments like silt and sand. Also, it is known to secrete an acidic substance that is toxic to other organisms that might try to settle and grow on it, so there is concern that it could actually kill herring eggs that might land on it. I have copied Marnie Chapman, Linda McCann and Sarah Cohen on this email to add any additional thoughts they may have, as these folks are also working on this question.

Linda

From: Linda Shaw [mailto:linda.shaw@noaa.gov]

Sent: Wednesday, February 08, 2012 2:33 PM

To: McCann, Linda

Cc: kim; Sarah Cohen; Darragh Clancy; Marnie D Chapman; bwoody ham; tammy.davis@alaska.gov

Subject: Re: Dvex/herring

Couldn't agree more!!!

On Wed, Feb 8, 2012 at 2:31 PM, McCann, Linda <mccannl@si.edu> wrote:

Kim,

We are indebted to you for your efforts. Education is critical! Thanks and keep pushing!

Platewatch Monitoring Coordinator

Linda McCann

SERC c/o Romberg Tiburon Center

3152 Paradise Dr.

Tiburon, CA 94920

[415 435 3528](tel:4154353528) office

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Impact of the invasive colonial tunicate *Didemnum vexillum* on the recruitment of the bay scallop (*Argopecten irradians irradians*) and implications for recruitment of the sea scallop (*Placopecten magellanicus*) on Georges Bank

James A. Morris, Jr.^{1*}, Mary R. Carman², K. Elaine Hoagland³, Emma R.M. Green-Beach⁴ and Richard C. Karney⁴

¹National Oceanic and Atmospheric Administration, National Ocean Service, National Centers for Coastal Ocean Science, 101 Pivers Island Road, Beaufort, North Carolina, 28516, USA, E-mail: james.morris@noaa.gov

²Geology and Geophysics, Woods Hole Oceanographic Institution, Woods Hole, Massachusetts, 02543, USA, E-mail: mcarman@whoi.edu

³National Oceanic and Atmospheric Administration, National Ocean Service, National Centers for Coastal Ocean Science 1315 East-West Highway, Silver Spring, Maryland, 20910, USA, E-mail: elaine_hoagland25@hotmail.com

⁴Martha's Vineyard Shellfish Group, Inc., PO Box 1552, Oak Bluffs, Massachusetts, 02557, USA, E-mail: mvsg@comcast.net

*Corresponding author

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Abstract

The invasive colonial tunicate *Didemnum vexillum* has become widespread in New England waters, colonizing large areas of shell-gravel bottom on Georges Bank including commercial sea scallop (*Placopecten magellanicus*) grounds. *Didemnum vexillum* colonies are also fouling coastal shellfish aquaculture gear which increases maintenance costs and may affect shellfish growth rates. We hypothesized that *D. vexillum* will continue to spread and may affect shellfish larval settlement and survival. We conducted a laboratory experiment to assess interactions between larval bay scallops (*Argopecten irradians irradians*) and *D. vexillum*. We found that larval bay scallops avoid settling on *D. vexillum* colonies, possibly deterred by the low pH of the tunicate's surface tissue. The results of this study suggest that widespread colonization of substrata by *D. vexillum* could affect scallop recruitment by reducing the area of quality habitats available for settlement. We propose that the bay scallop can serve as a surrogate for the sea scallop in estimating the negative impact *D. vexillum* could have on the recruitment of sea scallops on Georges Bank.

Key words: *Didemnum vexillum*, invasive species, tunicates, scallops

Introduction

Since 1988, sightings of the non-native colonial tunicate *Didemnum vexillum* Kott, 2002 (Figure 1) have increased substantially at locations on Georges Bank and in tidal lagoons and estuaries of New England, U.S. (Carman and Roscoe 2003; Pederson 2005; Bullard et al. 2006; Bullard et al. 2007; Dijkstra et al. 2007; Osman and Whitlatch 2007; Valentine et al. 2007a). The

specific vector of the *D. vexillum* introduction is uncertain, although international shipping, local boat traffic, and/or shellfish imports are among the likely sources (Wonham and Carlton 2005). Didemnids are colonial ascidians and are capable of both sexual and asexual reproduction. Didemnids also possess chemical defenses as evidenced by their highly acidic tunics (Pisut and Pawlik 2002). *Didemnum vexillum* exhibits a wide thermal tolerance of -2 to 24°C (Valentine

et al. 2007a) and resides in a variety of habitat types (Osman and Whitlatch 2007). In addition, didemnids possess other traits including multiple dispersal mechanisms, few known predators, and fast growth rates that enable them to invade, outcompete, and dominate new habitats around the world (Bullard et al. 2007; Lambert 2007; Osman and Whitlatch 2007).



Figure 1. Photograph showing *Didemnum vexillum* used during this study attached to Vexar® mesh

Didemnid colonization occurs on hard substrata and in areas of high anthropogenic disturbance such as docks, aquaculture gear, and mooring gear (Tyrrell and Byers 2007). Recent surveys in Long Island Sound and on Georges Bank revealed a benthos with up to 75% coverage by didemnid colonies at some sites (Lengyel et al. 2009; Whitlatch and Osman 2009). The direct impact of this coverage on benthic faunal communities is uncertain. However, there are several impact hypotheses including: 1) smothering of bivalves (Valentine et al. 2007b); 2) reduction of structural complexity; and 3) reduction in available benthic prey (infaunal organisms) for finfish (Lengyel et al. 2009; Mercer et al. 2009).

Clearly, the potential for negative ecological and economical impacts on commercially important finfish and shellfish is apparent. One fishery that could be affected is the sea scallop (*Placopecten magellanicus* (Gmelin, 1791)) fishery of New England. According to the NOAA National Marine Fisheries Service (NMFS), approximately 24,000 metric tons of sea scallops, valued at nearly \$400 million USD, were landed in 2006 (NMFS 2007) representing one of the largest valued commercial fisheries in

the U.S. Sea scallops are mollusks with pelagic larvae that settle to the benthos and attach to the substrata using byssal threads (Langton and Robinson 1990). We hypothesize that an additional impact of didemnid colonization may be a substantial loss of habitat for settling sea scallops. If this hypothesis is true, the continued spread of didemnids may impact sea scallop recruitment by reducing settlement substrate. For this reason, we designed a laboratory study to investigate the interactions between settling bay scallop (*Argopecten irradians irradians*, (Lamarck, 1819)) larvae (a surrogate for the sea scallop) and *D. vexillum*. Furthermore, the impact of *D. vexillum* colonies on the bay scallop fishery is itself of scientific and practical economic interest. The specific objective of this study was to determine if settlement of larval bay scallops is negatively affected by the presence of *D. vexillum*.

Methods

To determine if larval scallop settlement is reduced by *D. vexillum*, we conducted a laboratory experiment at the Chappaquiddick Island shellfish nursery of the Martha's Vineyard Shellfish Group, Inc., Edgartown, Massachusetts. Due to the unavailability of larval sea scallops for this experiment, we used larval bay scallops as surrogates for sea scallops. The setting behavior of larval bay scallops and sea scallops are similar enough that this experiment's results likely mimic sea scallop setting under the same circumstances.

We constructed two separate 500 L seawater systems representing an experimental and a control system with each system equipped with ten replicate settlement containers. Both systems were constructed of identical materials and received a seawater exchange rate of $1.2 \pm .5$ L/min. Each settlement container consisted of a 10 cm high x 30 cm diameter PVC ring with 118 μ m Nitex® nylon mesh glued to one side, creating a sieve-like container capable of receiving flow-through seawater and retaining larval bay scallops and *D. vexillum* colonies within the container (Figure 2). The benthic substratum in the experimental system containers was comprised of a colony of *D. vexillum* (25% of the bottom) and silicone (25% of the bottom) attached to pieces of Vexar® plastic mesh that rested on the nylon mesh (50% of the bottom of

the container) (Figure 2). The *D. vexillum* fragments were gardenized onto the Vexar® mesh from naturally occurring *D. vexillum* colonies found in nearby waters. In the control containers, the substrate was comprised of silicone on Vexar® mesh (50% of the bottom) that rested on the nylon mesh (50% of the bottom) of the container (Figure 2). In both container types, the

silicone was applied in a fashion that simulated the lumpy texture and relief of the surface of a *D. vexillum* colony. This design allowed comparisons of impacts of the tunicate on bay scallop settlement at both the system level (i.e., between seawater systems containing *D. vexillum*) and at the individual container level (i.e., between the two substrate types).

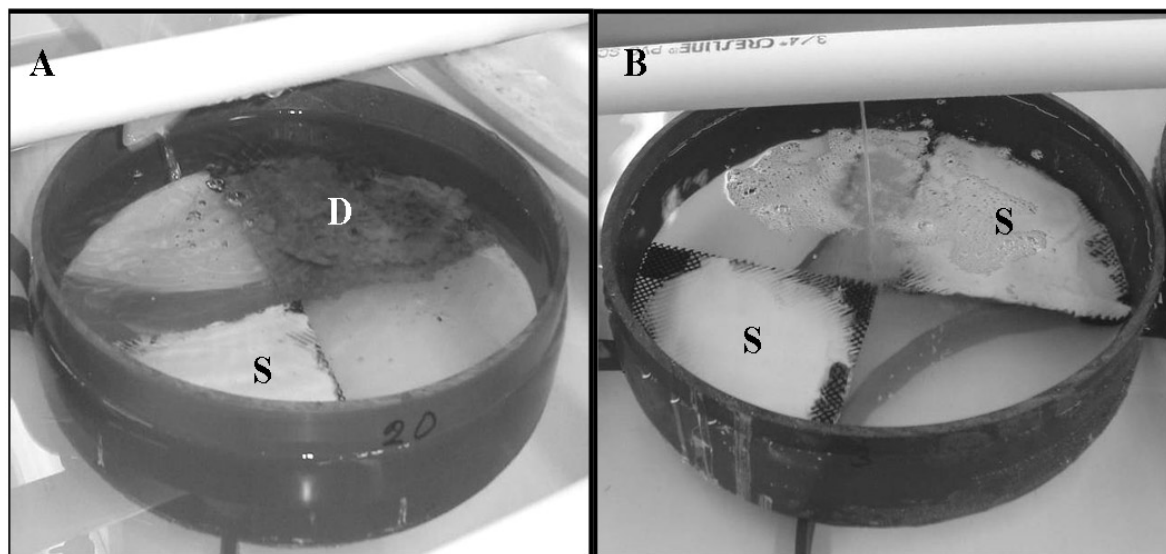


Figure 2. Pictures depicting one replicate sieve from the experimental (A) and control (B) tanks. D = *Didemnum vexillum* colony, S = silicone

Bay scallop pediveligers (9 days post spawning) were stocked simultaneously into all containers at a stocking density of approximately 32,500 larvae per container. Bay scallop settlement was observed regularly to determine when the larvae had begun to set. On the fifth day, when the pediveligers were beginning to form byssus attachments to the substratum, the locations of bay scallop larvae and their density per cm² were determined for each substratum type in each tank by visual observation using a dissecting microscope and transparent sampling grid. The total number of bay scallops per cm² was determined for each type of substratum in control and experimental tanks. These densities were compared using a Student's t-Test (SAS version 9.1.3, SAS Institute, Cary, NC) with an alpha of 0.05 considered significant.

To assess the tunic pH of the *D. vexillum* colonies during the trials, a pH probe was placed on the surface of the colonies of each container (n = 10) and allowed to press against the tunic

along the entire length of the tip of the probe. To determine the pH at the interface of the tunic and seawater, a pH probe was placed at the surface of *D. vexillum* but was not allowed to sink into the tunic. The pH of the silicone and seawater were also measured.

Results

No bay scallop larvae were observed to settle on *D. vexillum* colonies during this experiment. In both experimental and control tanks, scallop larvae were observed to be predominately associated with the silicone substratum. When comparing total settlement of scallops on all types of substratum between systems, we observed a mean of 13.2 ± 6.0 scallops per cm² in the experimental system and a mean of 41.8 ± 9.5 scallops per cm² in the control system (Figure 3). This difference was found to be statistically significant ($t = 2.49$, $df = 18$, $P = 0.023$).

The pH of the *D. vexillum* lobe was 3.8 ± 0.2 and the pH of the seawater at the tunic surface was 5.9 ± 0.2 . The pH of the silicone and seawater was 7.5 ± 0.1 .

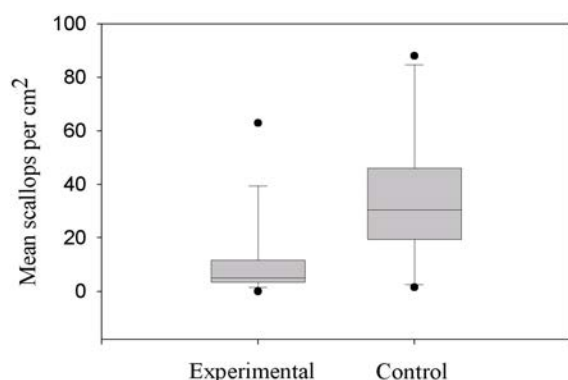


Figure 3. Boxplots depicting the mean number of scallops per cm² that settled in both the experimental (with *Didemnum vexillum*) and control (without *Didemnum vexillum*) systems. The boundary of the box closest to zero represents the 25th percentile with the line in the middle representing the median. The boundary of the box farthest from zero indicates the 75th percentile with the whiskers (error bars) indicating the 90th and 10th percentiles. Outliers are indicated by black circles

Discussion

The results of this experiment suggest that *D. vexillum* is capable of deterring settlement of bay scallop larvae and by analogy sea scallop larvae. We suggest that benthic coverage by *D. vexillum* may reduce bay scallop settlement and subsequently limit population recruitment to the fishery in New England coastal areas. Further, the expanding coverage of *D. vexillum* on the sea floor of Georges Bank may have the same effect on the sea scallop fishery.

The acidity of the tunic imparted by lower pH to the laminar surface waters of the *D. vexillum* colonies provided a zone that was acidic compared with ambient seawater. We hypothesize that the acidic property of the *D. vexillum* tunic is a deterrent to larval settlement. High mortality and abnormal development of molluscan larvae have been observed at pH values lower than 6.75 (Calabrese and Davis 1966). However, it is uncertain if larval scallop interaction (i.e., attempts to settle) with *D. vexillum* actually caused mortality of the scallop larvae. It is also unclear if the presence of *D. vexillum* colonies caused a delay in settlement, possibly having a negative effect on

scallop nutrition or health, or causing crowding of scallops on the alternative silicone substrate.

While we did not observe larval bay scallops settling on *D. vexillum* during the course of the experiment, we did note a few juvenile scallops on a *D. vexillum* colony in our field observations. It is likely that adult and juvenile scallops (which are quite mobile) can temporarily survive the acidic environment of the tunic. It is yet unclear if *D. vexillum* is capable of causing direct mortality of shellfish by over-growth.

This study provides the first documentation of the interactions between larval shellfish and *D. vexillum*. Given the potential impact that the tunicate could have on commercial shellfisheries, attention should be given to better understanding the specific ways that it impacts scallops, mussels, and oysters, with particular emphasis on the role of lower pH substrate on the setting behavior of larval shellfish.

Acknowledgements

We thank M.M. Carman for her valuable technical assistance and D. Ahrenholz, E. Williams, J. Govoni, and R. Reid for providing valuable comments on this manuscript. This work was funded by the NOAA Aquatic Invasive Species Program. Mention of brand names or manufacturer does not imply endorsement by the U.S. Federal Government.

References

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Didemnum vexillum (Dvex) in Sitka, AK

Prepared for House Resources Committee
1/23/2012

Marnie Chapman
University of Alaska Southeast - Sitka Campus
1332 Seward Ave., Sitka AK 99835
907-747-7702

Acknowledgements

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- San Francisco State University Romberg Tiburon Center for Environmental Studies
- Sitka Tribe of Alaska
- Sitka Sound Science Center
- US Coast Guard and Coast Guard Auxiliary
- US Fish and Wildlife Service
- **All the people in Sitka and outside of Sitka that have come together to support this project**

Dvex in Sitka

- Explosive growth and potential for spread
- Whiting Harbor infestation
 - First contain, then eradicate.
- Reduce possibilities for reintroduction
- Learn more about the biology of Dvex and potential impacts in Alaska

Growth Over 10 Week Period

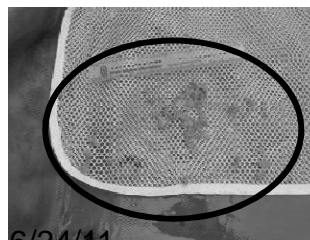
Appearance on 6/24/11
Whiting Harbor, Sitka, AK



6/24/11



6/24/11

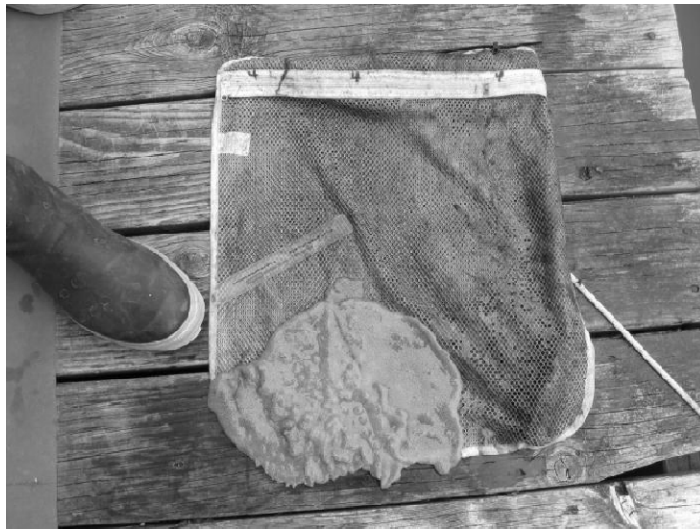


6/24/11

7/9/11



7/22/11



8/5/11



8/16/11



9/1/11



6/24/11
(10 weeks previous)

→ 9/1/11

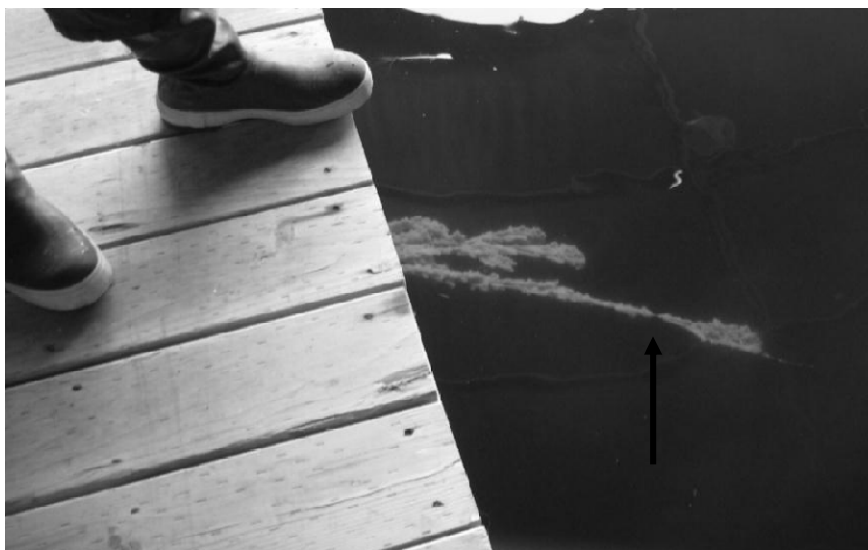


“Dangles”

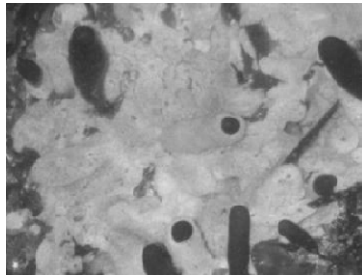
Typical 7-14
day growth of
dangles.



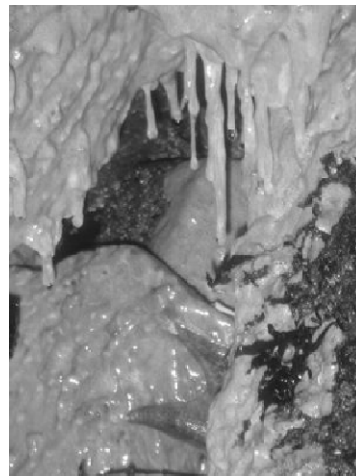
Dangles attenuate and break free



Within a few days



Intertidal Dvex
Sitka, Alaska

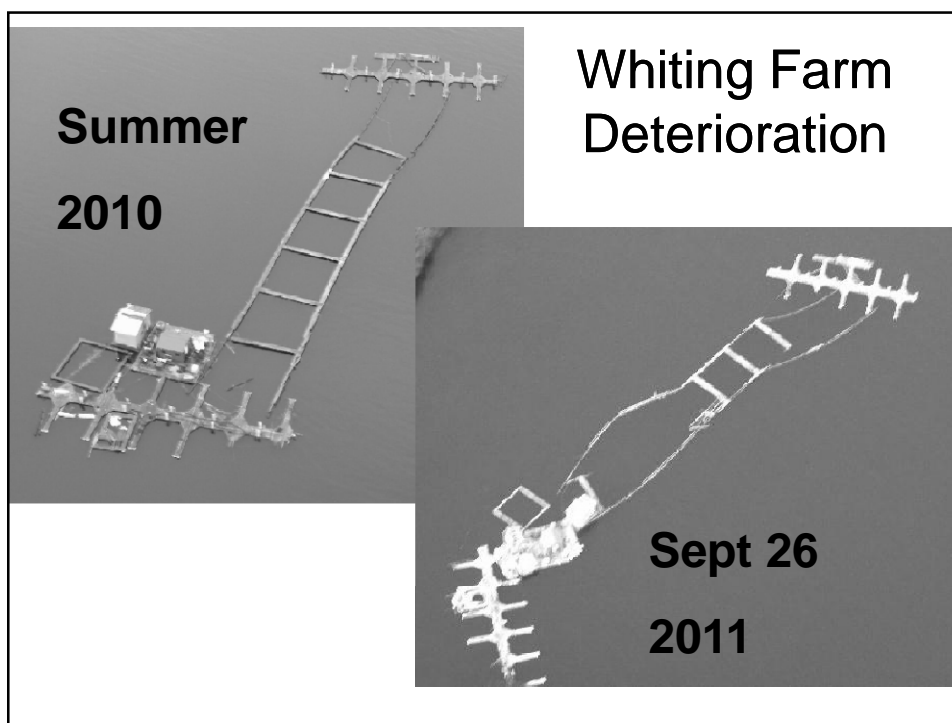


Dvex in Sitka

- Explosive growth and potential for spread
- Whiting Harbor infestation
 - First contain, then eradicate.
- Reduce possibilities for reintroduction
- Learn more about the biology of Dvex and potential impacts in Alaska

Whiting Harbor infestation First contain, then eradicate.

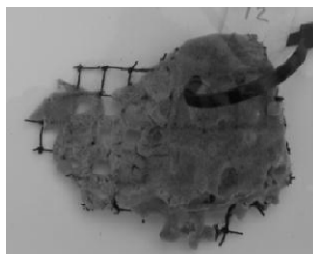
- We all have been saying “Whiting docks are deteriorating and may carry Dvex out of Whiting”
- In fall of 2011, more than a year after Dvex discovery we lost dock structures out of Whiting
- Much has been cleaned up after storms
- There is still a rapidly deteriorating dock structure in Whiting that is heavily infested with Dvex and not well secured.
- Ability to quickly identify and carryout containment is crucial for communities. Still needs to be addressed in Sitka



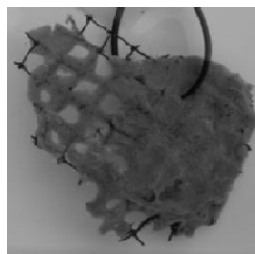
Eradication

- We need to learn how to eradicate
- Smithsonian Environmental Research Center is testing eradication methods.
- This spring the plan is to scale up and try application of salt to limited area of sub-tidal habitat.

10% Acetic Acid (5 min)



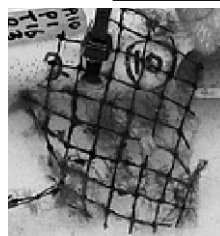
Before



After



1 Week



3 Weeks

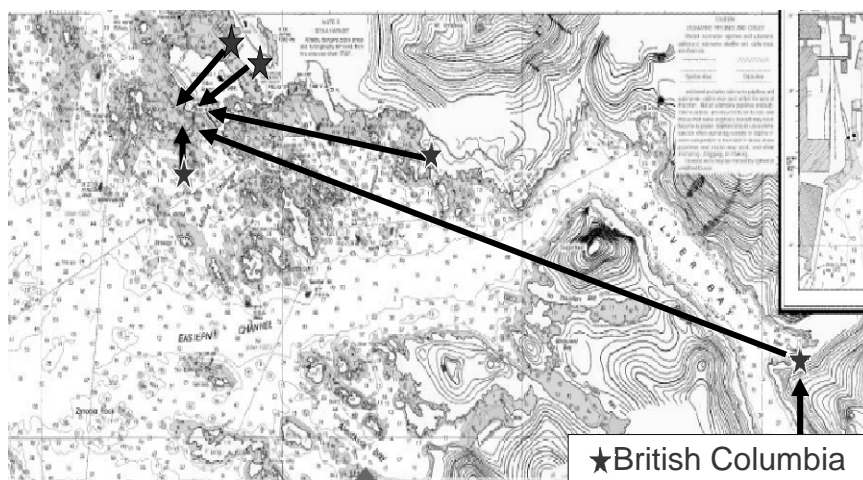
Dvex in Sitka

- Explosive growth and potential for spread
- Whiting Harbor infestation
 - First contain, then eradicate.
- Reduce possibilities for reintroduction
- Learn more about the biology of Dvex and potential impacts in Alaska

Reduce possibilities for reintroduction

- Ballast water, hull fouling, etc. all important
- Movement of docks other floating infrastructure has huge potential for spread of marine invasive species
- Moving a dock moves an entire habitat
- Very common in SE AK
- No legislation (?), little public awareness

Whiting docks pieced together from local and distant sources



Dvex in Sitka

- Explosive growth and potential for spread
- Whiting Harbor infestation
 - First contain, then eradicate.
- Reduce possibilities for reintroduction
- Learn more about the biology of Dvex and potential impacts in Alaska

Learn more about the biology of Dvex and potential impacts in Alaska

- Population genetics
- Distribution
- Ecological interactions and impacts
- Sexual reproduction & reproductive cycles
- Asexual reproduction & growth
- Considerations for containment & eradication

Impacts for Sitka and Alaska are Unknown

- Example: Herring Eggs (below)
- We know patches of Dvex can reach nearly 100% coverage Whiting.
- We do not know if herring will spawn on Dvex or if herring eggs can survive on Dvex.



Where do we go from here?
Where does Dvex go from here?



Whiting Harbor
Sitka, Alaska

February 8, 2012

Dear Board of Fisheries,

I oppose Proposal 312.

I am a second-generation salmon troller who had crewed out of Sitka for 24 seasons. As a child growing up in Sitka's troll fleet, I loved the August closures. They were my summer vacation - a chance to run around with other boat kids; the longer, the better. At the time, I didn't understand the financial blow that every day at the dock struck in my family's winter livelihood.

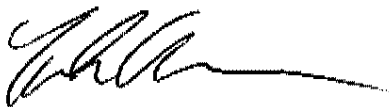
Now, as an adult, I understand the struggle to make a living in an industry that offers no guarantees. Our individual survival means putting in every day on the water that we can, while long-term industry survival requires us to maintain a commitment to conservation.

Veteran trollers often remind newcomers: "You can't catch last year's fish." We know that every season's salmon runs fluctuate wildly - *when will they come in? How abundant will the run be? When will they head for the rivers?* - and that a successful fisherman must bring individual deliberation to every season, resisting the urge to view each year through the same lens.

Successful management requires equally tailored consideration. The Alaska Department of Fish & Game does a tremendous job of in-season management. Through careful monitoring and data collection, ADF&G issues annual coho closures that are appropriate for that season's coho escapement and spawning allocation goals.

As someone who hopes to troll for many more seasons, I'm thankful for ADF&G's protection of each run according to that year's unique needs. Proposal 312 offers no evidence as to why ADF&G's long-standing methods are newly lacking, no explanation as to why ADF&G suddenly requires micromanagement. In my experience, ADF&G has never hesitated to issue a closure to do what's right for each year's runs. I believe in their ability to continue to do so.

Thank you for opposing Proposal 312.



Tele Aadsen, MSW
507 Katlian St
Sitka, AK 99835

11-11-12 15:04

February 9, 2012

Dear Board of Fisheries,

My name is Joel Brady-Power, and **I oppose Proposal 312.**

My parents brought me aboard their troller, the *Nerka*, when I was just two weeks old. Since then, I've spent every summer of my life trolling in Southeast Alaska. I shifted from deckhand to captain at the age of 22, when my dad retired and I bought the *Nerka*. My partner and I are now in our eighth season; this is our sole source of income and the life we love.

As a fisherman, I know not to expect the same conditions from year to year. The fish will always be somewhere else, at a different time, hungry for a different lure than they wanted last year. Runs are not a constant – they fluctuate from year to year – and that's why it's important that ADF&G continues to issue coho closures based on in-season management. Rigid thinking isn't how nature works, but that's what a mandatory 10 day closure would reflect. Proposal 312 throws out all of the science-based monitoring that ADF&G does.

I believe Proposal 312 is unnecessary. ADF&G already provides careful in-season management to the troll fishery. In the time I've been running the *Nerka*, our industry hasn't needed a 10 day closure. Our coho runs have maintained stability under ADF&G's in-season management. A mandatory 10 day closure seems like increased regulation for regulation's sake, not something that is required. It doesn't make sense to implement a mandatory policy that can't be changed as the natural conditions do.

Thank you for opposing Proposal 312.



Joel Brady-Power
F/V *Nerka*
5 Lost Lake Lane
Bellingham, WA 98229



ALASKA GENERAL SEAFOODS

6425 NE 175th Street
Kenmore, WA 98028-4808
Tel: 425-485-7755
Fax: 425-485-5172
Internet: www.akgen.com

RECEIVED

FEB 08 2012

BOARDS

February 7, 2012

Dear Chairman Johnstone and Board of Fish Members,

I am submitting this letter as representative of Alaska General Seafoods Inc. who participates as a buyer, processor and marketer of herring from the Sitka Sound Sac Roe Fishery. I am commenting on the two proposals listed below.

Proposal 238: Establish closed waters for the Sitka Sound commercial herring fishery in order to provide an area only open for subsistence.

Proposal 239: Exclude commercial herring fishing within a defined core spawning area within Sitka Sound to allow for harvest of herring spawn to meet the amount reasonably necessary for subsistence.

Alaska General Seafoods (AGS) has been a participant in the Sitka Sac Roe Fishery for over 23 years. For 17 of those years we have processed our herring at Seafood Producers Coop (SPC) in Sitka. Processing locally has given our company the ability managed our business in the Sac Roe Fishery more effectively. More importantly however, it has allowed AGS to expand its relationship with a local processor that is firmly rooted in Sitka. Through our relationship with SPC we have expanded our economic footprint in the community.

Seafood Producers Coop employs approximately 85 people directly at their facility during the Sac Roe Fishery. Approximately 72 of the people they employ are local residents. For SPC and its employees the Sac Roe Fishery plays an important financial role during the Sac Roe Fishery time period. Indirectly, there are other local residents working the barge company who haul our products that also benefit from our local participation.

Our AGS staff of 5-6 people rent local housing for the time we are in Sitka. We dine at local restaurants, patronize coffee shops and buy groceries at the local stores. We hire local people to directly assist us in various duties during the fishery period.



Our fishermen and tendermen, whose vessels each have 3-5 people aboard, spend two, three or sometimes four weeks participating in the fishery. These vessels, purchase fuel, parts and fishing supplies from local vendors. They also dine at local restaurants, buy groceries and patronize the same coffee shops. The City of Sitka, through the Port office, generates moorage revenue from our vessels. All of the activity described generates local tax revenue for the community.

We are just one of many companies participating in the Sac Roe Fishery. Our economic footprint touches many in the community. We feel that if **Proposals 238 & 239** go forward our business and the people in the community who benefit from our business will be greatly impacted because we will be handicapped in our ability to harvest our share the quota that is set by the Department of Fish and Game.

Allowing for a subsistence only area as described in **Proposals 238 & 239** will prevent the Department of Fish and Game from having the opportunity to effectively manage the Sac Roe Fishery to the best of its ability. The Department of Fish and Game has consistently strived to manage the fishery around the concerns of subsistence users. The Department of Fish and Game has managed the fishery openings around the area commonly referred to as the "core subsistence area", but they should *not* be restricted in their ability to effectively manage the fishery anywhere in Sitka Sound.

If the Sac Roe Fishery is prevented from catching its quota because there is a subsistence area restriction in Sitka Sound, we have raised the risk of not achieving the first step in the process, which is having access to the herring production needed to operate economically. If this should occur, it would be necessary to review of our business in the Sitka Sac Roe Fishery. The economic risk associated with further participation in a fishery with large areas off limits to commercial fishing may be too high to allow continued participation by our company.

Therefore, Alaska General Seafoods Inc. is opposed to Proposal 238 and Proposal 239.

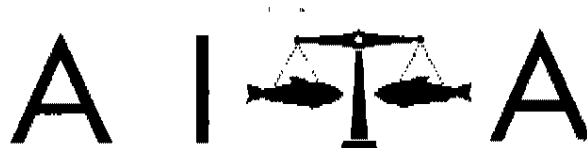
Thank you Board Members for the opportunity to comment

Sincerely,



Sandy Souter- Fleet Manager
Alaska General Seafoods

Cc: G. Lindquist, V.P. /G.M.



ALASKA INDEPENDENT TENDERMENS ASSOCIATION
"Tending to our future"

Dear Alaska Board of Fish,

The Alaska Independent Tenders Association (AITA) represents about 70 tenders operating in Alaska waters. We also represent the majority of tenders involved in the Sitka Sac Roe Fishery. The tenders are often overlooked when discussing the Sitka fishery. We are by the Board of Fish's designation "Stakeholders" in this fishery. Tenders helped pioneer this fishery right alongside the fishermen. Were it not for the tenders this fishery would not be what it is today. AITA is OPPOSED to proposals 232 and 233 creating an equal shares coop style fishery in Sitka. These proposals would create irreparable harm to the tender fleet by eliminating most of our jobs.

These same proposals have come up over the last 3 cycles and have been rejected by the BOF. The reasons for justification keep changing. One of the original reasons was to "reduce or eliminate tender costs". That means reduce or eliminate many of our jobs! In the second cycle the big push was so fishermen could convert their shares to a roe on kelp fishery. Now the reason is for "safety". There is no excuse for fishermen to operate their vessel in an unsafe manner regardless of regulations.

Many of us in the tender fleet have been involved in this fishery longer than most of the current permit holders. There are about 100 tenders participating in the Sitka fishery representing approximately 350 jobs. Many of the participating tenders have been involved in the fishery for more than 30 years. We have no permit to sell or lease, only our continued participation to help make a living. In years of abundance like this one, probably only half the tender jobs could be eliminated. In years of lower abundance up to 100% of the tender jobs could be eliminated. Quite frankly, loss of Sitka income would put many tenders out of business.

Most of us tenders are small family run operations which cannot sustain such a major reduction in annual income. The economic impact to tender crews, seine crews, pilots, the city of Sitka and supporting businesses, their families, the families of crews and their respective communities all feel the impact of the ripple effect and loss of jobs and income.

Sitka's herring fishery is not broken. The fishery is well managed. Stocks are increasing and harvests are within the GHL. Roe recoveries have been good to excellent. Sitka herring has one of the highest permit values in the state. Obviously if a fisherman is not happy with the fishery as it is, it will not be a financial hardship for him to sell out and buy into another more stable



ALASKA INDEPENDENT TENDERMENS ASSOCIATION
"Tending to our future"

income type of fishery. When it comes to Sitka please bear in mind "If it's not broken, don't fix it".

Limited Entry itself prohibits regulations favoring one stakeholder over another within a fishery. Creating an equal share coop type fishery would certainly do this to the tenders. Please consider this in your thought process and deliberations.

Consider also that the ONLY equal shares coop type fishery in the State of Alaska is the Chatham Strait Black Cod fishery. This was implemented for conservation reasons as the stocks were too low for a competitive fishery. It was also implemented with the 100% of the fishermen agreeing to it. This is not the case in Sitka.

Sitka already has in place the mechanism for a coop style fishery if all the permit holders agree on the need for it. Based on telephone conversations with some permit holders I believe that there are even more permit holders against an equal share type fishery than in the last cycle at BOF.

In conclusion it is our position that such a radical change in the Sitka fishery would do more harm than good. Please reject equal shares (proposals 232 and 233) for Sitka herring as you have seen fit to do in the past.

Sincerely,

Jim Edson

President of AITA and owner/operator of the F/V Kupreanof



ALASKA INDEPENDENT TENDERMENS ASSOCIATION
"Tending to our future"

Dear Alaska Board of Fish,

Alaska Independent Tenders Association (AITA) is opposed to proposals 238 and 239 creating fishing area reduction, for subsistence only zones. Sitka Sound has vast areas accessible to subsistence harvesters. Areas should not be restricted to subsistence use only anymore than they should be restricted to commercial use only. Fish have tails and will spawn where they feel like it, not always in the "traditional" areas. All users groups should have the right to pursue a harvest based on the location of the spawning biomass.

Reducing or restricting areas to one group or another could reduce ADF&G's ability to conduct a reasonable fishery for all. This could lead to loss of jobs and income in the commercial fleet or a reduction in subsistence harvest.

In conclusion AITA does not see that the benefit outweighs the risks for adopting proposals 238 and 239 and urges you to reject them.

Sincerely,

Jim Edson

President AITA and owner/operator F/V Kupreanof



Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

February 7, 2012

Board Support Section, ADFG
PO Box 115526
Juneau, AK 99811-5526

Dear Chairman Johnstone and Members of the Board,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA is a non-profit fishermen's association of over 100 vessel owners and deckhands. ALFA's mission is to support the sustainable harvest of marine fisheries while promoting healthy marine ecosystems and resilient coastal communities. ALFA is actively engaged in fisheries management, research, and policy development at the local, state and national levels.

OVERVIEW:

During your upcoming review of Southeast groundfish and finfish proposals, you will be asked to reallocate fish between users groups in multiple areas and multiple fisheries, but generally for the same reason: one group has reached or exceeded its allocation and wants more. Since very few species are under-subscribed in Alaska, the "more" must come from another user group. Many of the existing allocations that are being challenged were carefully negotiated by diverse user groups and carefully evaluated by a previous Board of Fisheries. Allocations are based on historic dependence and designed to conserve and fairly share resources between competing interests. In the case of lingcod, the allocations were set after much hard work and compromise; with rockfish, allocations were based on historic use and sectors were sternly directed by the Board to live within allocations. ALFA has respected existing allocations and, as detailed below, worked with the fleet to develop tools to assist fishermen in regulating catch and bycatch. ***As an overarching request, we ask that the Board reject proposals that reward overfishing with increased allocation or undermine stewardship by penalizing those who have conserved.***

PROPOSAL 212: Increase sport allocation of demersal shelf rockfish (DSR) ALFA OPPOSES

ALFA opposes this proposal for four reasons:

- The commercial fleet has depended on DSR as a valuable component of the mixed-species halibut fishery for over 30 years;

- The directed DSR fishery has high local importance to Southeast fishermen and processors since it occurs in the winter “off-season” when few other fisheries are prosecuted;
- Commercial fishermen have worked hard to develop tools to control rockfish bycatch while the



charter industry continues to overfish its allocation and claims rockfish bycatch is “unavoidable;”

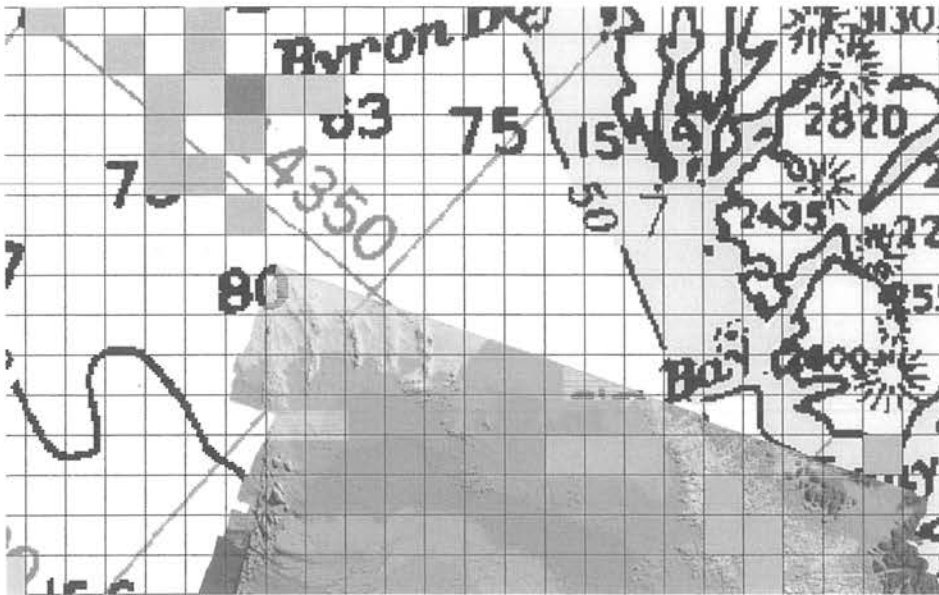
- Rewarding a sector for overfishing while penalizing a sector that has worked to conserve is contrary to sound resource management.

Six years ago, the Board of Fisheries allocated DSR between commercial and sport/charter fisheries based on historic harvest and local dependence. At that time, the Board challenged both sectors to learn to live within their allocations. With support from the Oak Foundation and after years of research, design, and hard work, ALFA launched a Fishery Conservation Network (FCN) to support stewardship innovation within the longline fleet.

HOW IT WORKS: FCN fishermen record catch and bycatch rate for each and every set. Data is recorded for each portion or segment of the set as it is hauled. This logbook data is verified with ADFG fish tickets,

and then entered into ALFA’s bycatch database. FCN fishermen also collect bathymetric data with a software program designed to map the seafloor. ALFA compiles the seafloor and bycatch data to assist fishermen with visualizing the reefs and pinnacles to avoid when longlining or trolling. Finally, ALFA has procured and translated into a usable format multi beam sonar maps that provide additional habitat detail. These maps allow fishermen to efficiently harvest halibut, sablefish and salmon without exceeding rockfish allowances.

OUR SUCCESS: In 2011, 43 vessels and 70 quota share holders participated in the FCN. Between 2009 and 2010, FCN fishermen reduced their rockfish bycatch rates in the halibut fishery by 20%. Bycatch rates in the sablefish fishery were reduced by 6%. The average bycatch rates for FCN members in 2010 were 7.25% for rockfish in the halibut fishery and 1.42% for rockfish in the sablefish fishery—well below the allowed bycatch rates (10% and 15%, respectively) and our project targets. FCN fishermen are now also engaged in a pilot project to improve catch and bycatch accounting on small longline vessels by beta testing electronic monitoring, and in research to quantify and deter sperm whale predation on longline survey and commercial sets.



Squares identify areas with bycatch rate data in set quadrants exceeding directed fishing standards (pink, 2009; grey, 2010; red, 2009 and 2010)

Because halibut quotas in Southeast have been reduced by 75% over the past six year and DSR bycatch is assigned as a fixed rate against halibut on board, the reduction in the halibut quota has driven a reduction in the rockfish available for commercial harvest. This reduction has left a portion of the commercial rockfish allocation un-harvested. The goal of the FCN is to provide fishermen with the tools to control bycatch rates to prevent resource waste and overharvest, not to continue to reduce bycatch. We have accomplished that goal and will continue to expand the FCN to ensure the fleet as a whole can control bycatch. **Rockfish are a valuable component of the halibut fishery and have been for over thirty years.** As halibut stocks rebuild the bycatch needs and the bycatch allowance to the halibut fleet will likewise increase.

In 2009 charter operators argued that DSR should be reallocated to them since they were exceeding their allocation and therefore deserved more fish. At that time, the Board recognized that rewarding overfishing would set a poor standard for fisheries management, and rejected the proposal. At the same meeting, ALFA staff offered to assist the charter fleet with establishing their own bycatch network to assist charter operators with identifying and avoiding high rockfish bycatch areas. The charter industry did not accept the offer, nor did the charter industry take the initiative to develop bycatch avoidance measures. Hence the charter industry can claim that rockfish bycatch is “unavoidable” and that their “inadequate” allocation might trigger time and area closures for sport salmon or halibut fisheries. This deliberate failure to conserve the resource SHOULD NOT be rewarded with an increased allocation. Commercial fishermen face the same threat when halibut stocks rebuild—a factor that motivated ALFA’s hard work to develop the FCN. ALFA urges the Board to respect the commercial fleet’s economic dependence of DSR and the commercial fleet’s commitment to resource stewardship, as evidenced by the work and resourced dedicated to the FCN. The Board should provide incentives to

conserve, rather than reward sectors that overfish. In the strongest terms, ALFA urges the Board to OPPOSE Proposal 212.

Proposal 216: Eliminate non-resident annual limit for sablefish: ALFA opposes

The Chatham Strait sablefish fishery is one of the most valuable State managed groundfish fisheries in Alaska. As the Board is aware, the Chatham Strait sablefish stock has been in decline over the past decade. The commercial catch limit has been reduced from over 3 million pounds to the current 882,000 pounds (see graphic below from ADFG).

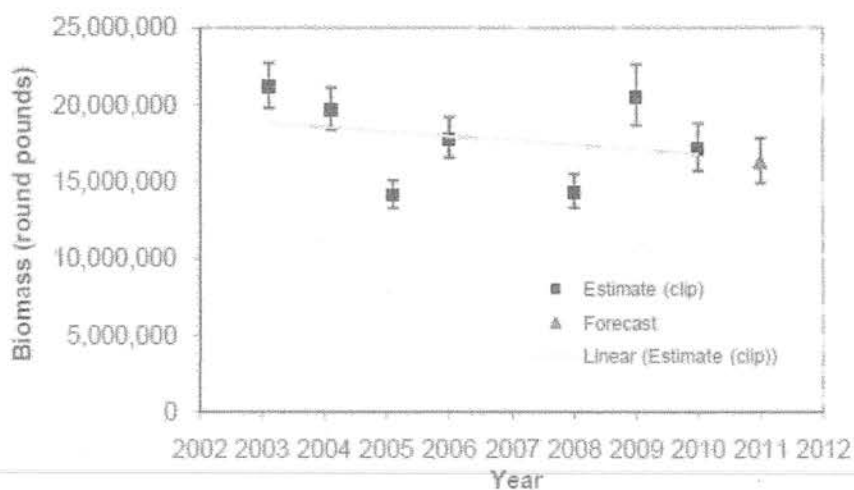


Figure 1. Petersen estimates of exploitable biomass with the 2011 forecast and 90% confidence intervals. Unlike previous years, the 2010 estimate has been adjusted to account for selectivity of the commercial fishery (both gear selectivity and highgrading). Unlike previous years, the 2011 forecast accounts for differing selectivity by age class allowing the forecast to be greater than the previous years' estimate.

Some members of our association have participated in this fishery and depended on this resource for over 50 years. Other ALFA members have invested over \$350,000 to enter the fishery. These historic users and new entrants who have made substantial investment in this historic fishery have accepted painful quota reductions over the past decade to conserve stocks. The Board should note that the decline has continued since the generous sport bag limits were established during the last Southeast Board cycle. Removing the annual limit will very likely increase the non-resident sport harvest of sablefish from this depressed resource, a reallocation that would directly contradict the Board's Allocation Criteria. Non-residents sport fishermen are the newest user group to participate in the Chatham Strait fishery; their opportunity to harvest sablefish has already been amply accommodated by the sport limits established by the Board during the last Southeast cycle. There is no defensible rationale for eliminating the non-resident annual sablefish limit.

Proposals 217-222: Reallocate lingcod between user groups- ALFA OPPOSES

ALFA does not support increasing lingcod catch limits when the increases are not scientifically based, nor do we support reallocating lingcod between user groups. The Southeast lingcod allocations were developed through a lengthy consensus-based process. Longliners in particular compromised historic catch to accommodate the directed lingcod fishery above and beyond its historic catch level. ALFA is concerned by the disregard for science-based quotas expressed in some proposals and the disregard for historic dependence and past agreements expressed in others. These proposals can be grouped as a resource grab based only on one user groups desire to secure more at the expense of another and, without exception, more historic user group. We urge the Board to reject these proposals.

Proposal 270: Require a permit for subsistence or personal use harvest of sablefish: ALFA SUPPORTS

ALFA supports improving reporting and tracking of sablefish taken by subsistence and personal use harvesters. Existing regulations allow unlimited subsistence harvest of sablefish, with no restriction on gear or catch. Miles of longline are allowed and used. Some "subsistence" harvesters have landed thousands of pounds. Given the depressed status of sablefish stocks, accounting for and controlling these removals is critical. ALFA supports either the Board implementing a record keeping system and annual limits for subsistence and personal use sablefish, or the Board vesting that authority in the department. If annual limits are assigned, they should be reasonable designed to allow harvesters to meet family food needs without inviting excess.

SUMMARY:

During this Southeast Board cycle, the Board will review a number of ADFG proposals that improve catch accounting and management of Southeast finfish and groundfish resources. ALFA supports proposals that meet these criteria. We do not support proposals that promote poor stewardship, increased harvest by new user groups in fully subscribed fisheries, or reallocate resources from historic harvesters. ALFA strongly opposes proposals 212 and 216 as direct threats to the resource and to sound management principals; we also oppose proposals 217-222 as resource grabs that ignore historic agreements. In reaching decisions on Southeast proposals, ALFA urges the Board to maintain State commitments to sustainable resource harvest, to incentivize good stewardship, and to adhere closely to the established BOF Allocation Criteria.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
(Executive director, ALFA)

Alaska Longline

FISHERMEN'S ASSOCIATION

Fishery Conservation Network

Empowering Stewardship Innovation through Research and Collaboration

For the past three years, the seventy commercial fishermen of the Fishery Conservation Network (FCN) have successfully worked together to reduce rockfish bycatch rates and map seafloor habitat.

What They've Done

- Gathered and verified catch and bycatch rate data in the longline halibut and sablefish fisheries
- Collected bathymetric data and mapped areas of the ocean floor
- Compiled detailed maps that help them avoid seafloor structures where rockfish concentrate

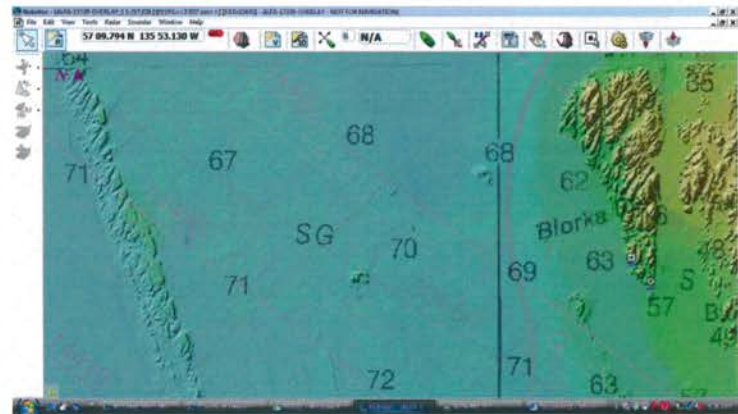
Measures of Success

- Between 2009 and 2010, FCN fishermen reduced their rockfish bycatch to 7.25% (a 20% decrease) in the halibut fishery, and to 1.42% (a 6% decrease) in the sablefish fishery.
- These rates are well below the allowed bycatch rates of 10% in the halibut fishery and 15% in the sablefish fishery.

What's Next

Building on this successful collaboration, the FCN fishermen are also engaged in additional joint efforts:

- Collecting genetic and behavioral data on Gulf of Alaska sperm whales
- Developing strategies and deterrents that minimize marine mammal predation on longline gear
- Operationalizing electronic monitoring on small longline boats
- Exploring fuel-efficiency strategies to reduce the fleet's carbon footprint



"The Fishery Conservation Network demonstrates what fishermen can do when they work together. Continued development of innovative solutions to bycatch issues, such as the FCN, will contribute to successful fisheries management in Alaska."

- Cora Campbell,
Alaska Department of
Fish and Game Commissioner



Stewardship Gains

- More efficient harvesting of halibut, salmon and sablefish
- Reduced rockfish bycatch and habitat impact
- Reduced risk of marine mammals entanglement
- Improved catch accounting
- Increased collaboration among fishermen to protect the resource
- Greater opportunity for additional progress in conservation and sustainable fishing practices

"For us, it's not just about catching fish, it's about caring for the resource. It's our passion, our future."

- FCN Fisherman Jeff Farvour,
F/V Suunta



Photo by Walter Pasternak



Photo by Dan Evans

Stewardship Challenges

Since 2006, halibut quotas in southeast Alaska have been reduced by 75%. Rockfish stocks are also declining.

Because rockfish bycatch is assigned as a fixed rate against halibut on board, the reduction in the halibut quota has also reduced the rockfish harvested by the commercial halibut fleet.

This reduction, coupled with the FCN fishermen's achievements, has left a portion of the Southeast commercial rockfish allocation unharvested.

Rockfish remain a valuable component of the multi-species commercial halibut fishery. Rockfish have been taken as limited bycatch in the halibut fishery for thirty years. They are prized by consumers across the nation for their light white meat and firm texture.

Alaska's community-based commercial fishing families deliver high-quality seafood to local processors for distribution around the world. Commercial fishing provides both a livelihood and a way of life to the fishermen and communities of southeast Alaska.

Supporting Strong Stewardship

When halibut stocks increase, commercial harvest of rockfish will once again increase. By using tools developed by the FCN, commercial fishermen will harvest their valuable rockfish allocation without exceeding specified levels.

The FCN demonstrates what fishermen can do when they work together. Managers can support stewardship collaboration by enhancing opportunities for fishermen who demonstrate a commitment to sustainable resource harvest.



Photo by John Calambokidis, © SEASWAP 2009

Alaska Longline

FISHERMEN'S ASSOCIATION

Alaska Longline Fishermen's Association (ALFA) is a non-profit association of independent commercial longline vessel owners and crewmembers who are committed to continuing the sustainable harvest of sablefish, halibut, and groundfish, while supporting healthy marine ecosystems and strong coastal communities through resource stewardship and participation in federal, state, and local forums.

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

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FEB 09 2012
BOARDS

Chairman Johnstone and board members,

I am writing to support BOF proposal #325 (as amended by the JRPT) of the 2011/2012 proposed regulation changes book. I support the proposal because commercial fishing is our lively hood and passion. We fish as a family and feel that it is very important to fish all the species allowed by trolling and our quota and we have fallen below our allowable chum catch. We need more areas and opportunities to catch chums. We have always focused on Coho and King Salmon, but due to the cut backs on our king allowances and low coho prices and high fuel prices, it has been in our best interest to start focusing on Chum Salmon as well. Including more opportunities for fishing Chum Salmon also benefits us because we fish as a family with our now 2 1/2 year old daughter. The more we can fish on the inside the better due to a wide range of limitations while fishing kings and cohos such as severe weather and our proximity to fish plants and services.

We were first introduced to the Chum Trollers association when we fished next to a handful of boats in Icy Straits. We were fishing for King Salmon while the other trollers were targeting Chums. Because of the different gear and fishing techniques involved we didn't catch any chums until we put on our chum gear and didn't catch any kings while fishing chums. It was a nice surprise to see how well we were able to target a specific species of salmon and only catch what we were after. That is very important because it allows for fewer losses and bi-catch. It is important to us as Commercial Fishermen and Alaskans to protect our fish and their environment. To us trolling is the best way for us to do that and still provide the quality of life wanted for our family.

As a fishery we have the finest quality of hand pick salmon and it is important to maintain that quality and to have the finest fish offered to our buyers as a good representation of Alaska. Unlike other fisheries we are able to provide a large number of a quality salmon by targeting a certain species without making a great impact on other species. Because we hand pick and use the gear necessary to target a certain species of salmon we are able to catch 600 legal chums per legal chinook. It just makes sense to allow trollers to harvest their allocated share of 27 - 37% of SE enhanced salmon harvest. If we were able to make an effort in 2011 and harvest about \$4,000,000.00 just think what it would do for the state, community, and fishery if we were able to extend our fishing area to include more of the Icy Strait and Juneau.

We are a born and raised Juneau based family and have fished the waters around Juneau our entire life. It just seems right to allow the trolling to be closer to Juneau and would provide much needed business to the community. It is in our best interest to cut back on fuel costs by purchasing and selling our salmon to a facility closer to Juneau and allowing us to purchase supplies, fuel, and use the harbor facilities. Trolling in icy straights and Lynn Canal would not greatly impact other fisheries but better enhance the community and effectiveness of harvesting our salmon trolling allowances.

Sincerely,

Ryan Andree
F/V Pagan
Juneau, AK

**Alaska Trollers Association
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	Proposal	ATA Position	ATA Proposal
141	Prohibit fishing for bottomfish/shellfish near Cache Island.	O	
142	Prohibit non-resident fishing for bottomfish/shellfish in Behm Canal.	O	
143	Prohibit non-resident fishing for bottomfish/shellfish near Naha Bay.	O	
144	Prohibit non-resident fishing for bottomfish/shellfish near Cedar Island.	O	
<p>Proposals 141-144 request wholesale fishery closures for non-residents, and in the case of Cache Island (141), all users. All proposals would establish marine protected areas, supposedly to rejuvenate local bottomfish and shellfish populations, yet the proposers fail to provide any specific data or circumstance to support their claims that the resource is in decline, or that it is poorly managed. No information is given to suggest that the resource is being overharvested, by either non-residents or locals. The proposers ask that waters around Cache Island be protected solely on the basis that the uplands enjoy some level of protection and because, 'something is better than nothing'. While marine sanctuaries have been applied as a useful tool in this state and others, they are not something to be implemented without definitive goals and objectives. On its face, this suite of proposals offers the Board of Fisheries no concrete problem to act upon. We urge you to vote no, as any action in support is likely to be arbitrary and excessive.</p>			
200	Clarify use of post-processed and reported commercial fish as bait.	S	
206	Create a commercial spiny dogfish pot fishery in the Ketchikan area.	S	
207	Increase the dogfish daily bag limit from 5 to 10.	S	
212	Increase sport DSR allocation to 25%	O	
<p>The Board of Fisheries established the allocation between the commercial and charter fleets when the quota was higher, but it was well-known at the time that the quota would rise and fall. It's unfortunate that low halibut numbers are impacting both fleets, but it doesn't seem appropriate to reallocate the DSR resource away from longliners, who have a long history of landing them. When the halibut quota goes back up, both fleets will see benefits, and the commercial fleet will need the full DSR allocation as it was currently envisioned.</p>			
216	Repeal nonresident sablefish annual limit.	O	
217	Change lingcod allocation between commercial fisheries.	O - as written	
<p>ATA is interested in securing a troll allocation of lingcod in the Icy Bay Sub-District (IBS), but is not yet certain if ADFG will support an increase in the GHL as suggested in this proposal, or whether this is the appropriate allocation plan to meet the needs of all affected fleets. More discussion amongst stakeholders would be useful.</p>			
218	Allow for retention of lingcod in other fisheries.	S	
219	Increase commercial lingcod allocation in NSOS.	S	
<p>Lingcod in NESO are very healthy and the small GHL spans a large fishing area. Proposals 218 & 219 will improve the utilization of lingcod, while reducing confusion for trollers who either can't or won't fish an area, or release fish, as opposed to risk being penalized if the quota is taken by the time they deliver.</p>			

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221	Increase sport lingcod allocation in CSO/SSO.	O	
While we appreciate the proposer's attempt to provide additional fish to trollers and address under-utilized lingcod - and are also frustrated by our inability to keep lingcod throughout the season - ATA does not support reallocation away from the other fisheries. In particular, the reduced landings of lingcod by longliners could be a direct result of lower halibut quotas. That allocation will be important to the longline fleet when the abundance of halibut goes back up. For now, we support status quo.			
240	Allow up to 1,000 tons Sitka Sound herring for commercial bait when sac roe fishery GHL exceeds 10K tons.	S	
Bait herring has been in short supply recently and trollers who use bait are having a tough time finding sufficient product. Setting aside a relatively small amount of herring to be harvested specifically for bait could help fill the gap. We note that this proposal was submitted by employees of three separate processors, who state that the longline fleet also needs an additional source of bait.			
241	Eliminate winter bait herring fishery at Hobart Bay and reallocate to gillnet sac roe fishery.	O	
This proposal could eliminate an important source of bait. See comments at #240.			
248	Change definition of 'bag limit' for anglers fishing from a vessel.	O	
249	Establish nonresident annual limits for all species of salmon in SE except Chinook.	S	
ATA has long supported meaningful and enforceable possession limits. Annual limits have proven effective for Chinook salmon. Expanding existing punch card requirements to include coho salmon would provide an aide for enforcement of possession limits; and, if turned in to ADFG, could assist with more timely and accurate enumeration of harvest.			
250	Allow retention of king salmon in freshwater.	O	
<p>While there are a couple of large producers, most Southeast Alaska Chinook stocks are less abundant than those in the Kenai or the Copper rivers. The majority of Southeast rivers are small and most Chinook populations number no more than 1,000 fish.</p> <p>Beginning in 1963, restrictions were imposed on both sport and commercial fisheries to conserve Southeast Chinook stocks. Sport fishing for king salmon in Southeast rivers was curtailed ; mixed stock commercial fisheries were restricted; directed troll and gillnet fisheries on the Taku and Stikine Rivers were closed. A portion of Behm Canal, near Ketchikan, was turned into a sanctuary area and is still closed to both commercial and sport fishing. Today, stocks are fully allocated and conservative management, including the freshwater prohibition, provides for Chinook fisheries in marine waters. Care must be taken to maintain sustainability and to avoid disrupting existing sport and commercial users.</p> <p>The Chinook fisheries in the Taku and Stikine rivers fall under intricate provisions governed by international treaty. The Pacific Salmon Commission (PSC) designed sharing agreements between the US and Canada, which only allow a directed Chinook fishery if specific criteria are met. Consequently, since its inception, the Taku River fishery has only been opened three years - 2005, 2006, and 2009. Would freshwater fishing be allowed in the years the Taku River was closed to other directed fisheries?</p> <p>Given 40 years of sacrifices made by all local fishermen, we hope the Board will refrain from re-opening freshwater Chinook fisheries based on conservation alone. However, should you chose to allow this fishery, it would be reasonable to counted those fish against the sport Chinook quota, particularly in the</p>			

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Taku, Stikine, and Alsek, which are bound by treaty sharing agreements. Unfortunately, this could result in a significant re-allocation away from the marine sportfishery, which local users heavily rely upon.

251	Allow two rods for non-guided anglers in saltwater.	O	
252	Allow power assisted reels for disabled anglers.	S	
253	Establish system to distinguish between vessels participating in HT and guided charter.	S	
255	Create a Taku River king salmon sport fishery.	O	

Taku River Chinook are a resource shared by Alaska and Canada. Adults transit Alaska waters and spawn in the Canadian portion of the river. Juveniles are broadly distributed and utilize critical habitat in all sections of the Alaska's portion prior making their way out to sea. The Taku is one of several transboundary rivers subject to the terms of Annex IV, Chapter 1 of the Pacific Salmon Treaty (Treaty). Directed Chinook fisheries harvesting Taku fish are managed according to this agreement with Canada. Taku Chinook taken in mixed stock fisheries are further accounted for under Annex IV at Chapter 3. Alaska's fisheries all occur in marine waters and are recognized by the Pacific Salmon Commission (PSC).

Chapter 7 of the treaty covers what is known as the 'General Obligation'. It states:

'With respect to intercepting fisheries not dealt with elsewhere in this Annex, unless otherwise agreed, neither Party shall initiate new intercepting fisheries, nor conduct or redirect fisheries in a manner that intentionally increases interceptions.'

While sport fishing is by no means a 'new' fishery, an in-river Chinook fishery is definitely a 'redirected' fishery with the potential to increase interceptions. It also sets up a new situation for treaty negotiators to contend with, since this fishery has not been envisioned during any negotiation cycle.

What kind of enforcement and creel census program would be implemented to adequately enumerate harvest, ensure conservation and allocation commitments, and otherwise measure the impacts of this new/redirected sportfishery? What would be the cost to the state? Would the marine sportfishery be restricted to provide for this fishery? Would other user groups be impacted?

The proposers appear to be people who already utilize the Taku watershed. They state that they have been '*discriminated against when compared to other Alaskans*'. We don't buy it. The Kenai River is as far in distance from the Taku as it is in circumstance. Every region is unique and every watershed is different. The beauty of our management program is that it's based upon that simple truth. ADFG and the user groups have worked together and made the tough choices to recover Chinook stocks in the Taku River. It's been a long haul, but now all user groups are benefitting. Taku River anglers have boats and already have quick hook and line access to Taku Chinook, just like other Taku River anglers. Why now risk disrupting the balance of conservation and sharing between both Alaskans and Canadians?

260	Liberalize king salmon regulations near Ketchikan.	O	
261	Increase king salmon bag limit near Neets Bay.	O	
274	Allow personal use fishery to target coho and Chinook and include additional gear types.	O	
277	Allow dipnets in the Taku R. for personal use.	O	

See comments for proposals 250 and 255.

The proposers suggest that dipnets would be more selective than the set nets current used and would reduce bycatch. This is probably true. However, dipnets are also likely to be more efficient and catches

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could climb, particularly if more users decide to get involved in the fishery. Dipnets are less expensive and easier to use than a set gillnet and there could be more places to employ them.

The proposal states that the fishery might reduce Canadian fishing opportunity, which could create issues for Alaska and the U.S. at treaty negotiations. Additionally, enumerating harvest could be complicated by any change in personal use conduct.

Safety is mentioned as a key concern and proposers argue that dipnetting will be a safer way to fish. That's difficult to believe, given the river's chronic history of glacial-outburst flood events during key personal use fishing times. About the only time the Taku isn't prone to flooding is when it's frozen.

Habitat issues should not be disregarded. Where will this fishery occur and how many fishermen are estimated to participate? The Taku River is a transition zone and is a very rich and unique ecosystem; salmonids and other species heavily utilize all areas of the river for spawning and rearing. A look at other dipnet fisheries around the state provide verifiable evidence that streamside and nearshore habitat can quickly be impacted by an influx of users.

278	Extend personal use fishery in Taku R.	O	
<p>Proposal 278 has significant Pacific Salmon Treaty implications. Expanding the time period allowed for personal use could substantially increase the US catch rate and potentially impact Canadian harvests, which would quickly become an issue for negotiators.</p> <p>Safety is raised as an issue, but given the unpredictability of flood events in the Taku River, it's doubtful that any change in regulation will lessen flood related risks for personal use fishermen.</p>			
279	Increase Taku R sockeye daily and annual bag limits based on number of people in household.	O	
283	De-link Yakutat spring Chinook harvest from Situk River Mgmt Plan	S	
<p>In 2006, the Board of Fisheries established a spring troll fishery for the Yakutat area and set a cap of 1,000 fish. In order for the fishery to occur, the forecasted return to the Situk River has to exceed 1050 fish. Since the fishery was put in place, that threshold has not been met. Ironically, the fishery would have opened in nearly each of the ten years preceding the regulation. What little data exists suggests that this fishery would have very little impact on Situk Chinook or other users. The fishery would only run one day per week and could afford ADFG an opportunity to gather data on stock composition, while providing economic opportunity at a lean time of year.</p>			
284	Establish increased fishing periods for troll when the directed drift gillnet fishery is open in 11-A and 11-B.	S	*
<p>From Statehood until the chinook fishery was closed (1977), the troll fleet averaged 35% of the Taku River harvest share. Considering the modification and improvement of gillnet gear that occurred in the 60s and 70s, it's likely that the troll proportion of the Taku harvest prior to statehood was even higher than 35%.</p> <p>ATA recognizes that achieving a fixed allocation or percentage would be unduly disruptive for other users. However, trollers still want an opportunity to harvest a fair share of the salmon runs they helped to rebuild. Providing more trolling time and area will help to achieve that goal. It makes absolutely no sense to base the length of troll openings on the length of gillnet fisheries. Therefore, we request that the number of allowable trolling days be de-coupled from the length of time the gillnet fishery is open.</p> <p>ATA supports a 5 day a week (Mon-Fri) fishery in 11-A; and, a 7 day a week fishery in 11-B, during any week that a directed king salmon drift gillnet fishery occurs on the Taku River</p>			

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The relative inefficiency of troll gear in terminal areas makes it unlikely that increased time and area would significantly impact the balance of harvest, but it could do a lot to improve opportunity for a few boats in the local fleet during a slow time of year.

Under the current *Taku River King Salmon Management Plan*, troll openings are based on the ratio of days open to drift gillnet vs. days open to troll. The directed fishery is based on forecasted run strength and has occurred in only three years – 2005, 2006, and 2009. Since only three (or less) trollers fished the opening in 2009, the catch data is confidential. We were told that the catch number was quite low and similar to previous years.

In 2005-2006, trollers averaged just 16 fish – far less than 1% (0.001%) - of the average commercial harvest of (15,404). ADFG estimated that if trollers had fished 7 days a week throughout the entire District 11 they would still have only averaged about 34 fish per year.

In 2006, trollers caught 11 (eleven) fish in 18 days, or less than one fish per day (0.6 fish). That year, the gillnetters caught 1,138 fish per day and the sportfishery caught 2,415. This means trollers caught just 0.0005% of what the gillnetters, and 0.0002% of what anglers took home.

It would take a big increase in effort to push the troll catch to any significant level. Such an increase is highly unlikely given the terminal nature of the fishery and its dampening effect on troll catch rates.

Gillnet harvest rates are usually many times that of the troll fishery. In 2005-06, troll and gillnet CPUE in the District 11 fishery was 0.2 and 4.3 respectively. To compare, CPUE in District 8 averaged 2.4 for troll and 10.6 for gillnetters in 2006-2008 – that's 5 gillnet fish for every 1 fish caught by trollers. In 2008 alone, that ratio was 7:1.

288	Allow seiners to carry two seine nets.	S	
Understand argument of needing extra gear in case of problems and this proposal seems reasonable.			
289	Close D10 to seine and open to gillnet.	O	
291	Allow seining for pinks at Pt. Adolphus in years of high pink abundance.	O	
ATA doesn't like to oppose reasonable opportunity for any fishery, but this area is complex and there are other places for seiners to access these fish (e.g. near Hoonah / Hawk Inlet). 2011 was a high abundance year for pinks and there were also lots of coho in Mudd Bay, which could easily have created conflicts between the fleets if more trollers had shown up.			
294	Reporting commercially-caught salmon and steelhead for personal use.	O	
This regulation is impractical and unnecessary. Commercial fishermen are already required to report personal use harvest on fish tickets and troll deliveries are heavily sampled, which typically includes interviewing the skipper. Creel census personnel have nothing to do with commercial fisheries and are not generally working in proximity to commercial fishing activities. Where do you find a creel census person in Point Baker, or at a Hoktaheen buying scow?			
295	Modify gillnet fishery in Zimovia Strait and Chichagof Pass to increase seine hatchery catch.	S – w/amd to protect troll king access	
ATA supports additional opportunity to help seiners achieve their hatchery allocation. However, given the efficiency of seine gear, we ask that accommodations be made to protect access for trollers who fish for			

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king salmon in the area during the same timeframe.			
296	Open gillnet fishery in D6 all season for pinks.	O	
Could increase interception of Anita Bay Chinook and further exacerbate hatchery allocation imbalance.			
298	Limit D5 seine pink fishery to increase gillnet harvest in D6.	O	
Restricts managers from implementing abundance based management strategies.			
299	Extend commercial closed waters in Taku Inlet.	O	
ATA opposes any fishery closure proposal that involve questionable rationale. Taku River stocks are well studied and ADFG has expressed no conservation concerns that warrant modifying the gillnet fishery.			
301	Create separate sportfish area on Tsiu River.	O	
302	Prohibit power boats driving fish into nets in the Tsiu River.	O	
307	Allow downriggers in HT fishery all season.	O	
308	Allow 6 lines in some inside waters to increase harvest of enhanced salmon.	O	
This proposal could have the unintended consequence of forcing early closure of spring hatchery access areas, due to increased take of treaty Chinook. Also, fishing more lines could create some logistical fishing conflicts in the smaller areas.			
309	Allow 4 hand gurdies after July king opening.	O	
Oppose as written - confusing. Might not mind additional gear for breakage, but don't support additional gurdies in use.			
310	Amend winter troll guideline harvest by adding hatchery produced kings.	O	
<p>ATA strongly supports the existing winter fishery, but opposes proposal 310. This proposal would take fish from the spring and summer fisheries, which is not in line with the management objectives for the troll fishery. It is questionable whether or not ADFG would be able to manage this provision in-season. Late April is by far the busiest time of the winter season. How soon could ADFG get the hatchery tags read in order to make the management call? Would they re-open the fishery if it was found that a lot of Alaska hatchery fish were delivered the last couple weeks of the winter fishery? And what if the add-on number came in after the winter fishery was already closed? Proposers suggest using the rolling average as an alternative, which would be a direct allocation away from the spring and summer fisheries.</p> <p>The following is a snapshot of the history underpinning our request that the Board refrain from modifications to the winter fishery at this time.</p> <p>In 1992, catch in the winter fishery was growing fast, primarily due to increased Chinook abundance. Catches that had run about 25,000 shot up in the early 90's. This, coupled with substantial growth and catch in the guided sportfishing industry collided with the very low treaty quota. Chinook were allocated between commercial and sport, and trollers were tasked with trying to address a dwindling catch share and shorter summer season. The Board of Fish established a Chinook Troll Task Force (Task Force) and charged them with designing management changes that would:</p> <ul style="list-style-type: none"> • ensure a minimum summer season of 10 days, preferably 20 			

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- minimize the incidental mortalities to the greatest extent possible
- maximize the value of the troll product
- recognize the historic composition of the fisheries
(BOF,92-133-FB)

The Task Force was made up of 12 trollers representing all sectors of our diverse fleet, and all geographic areas from Dixon Entrance to Yakutat; 2 processing representatives; and, the ADFG troll manager. The Task Force's primary goals were:

- to comply with the Board of Fish mandate,
- to maintain traditional fishing and management patterns, and
- to maintain the historic allocation

The winter fishery was the most contentious part of the Task Force's work. They recognized the winter troll season as extremely valuable to the region's economy and also that Chinook abundance was going up. Harvest caps were discussed, from 0-70,000 fish. Ultimately, they chose 45K, as a mid-range, which was also about twice the historic average catch. Then, actions were taken to reduce spring trolling and move all remaining fish to the summer fishery, to extend the season and reduce incidental mortality. Any future surplus quota fish were anticipated to accrue to either expanding the spring access fisheries to catch add-on fish, or to the summer, to achieve the stated BOF goals.

Unfortunately, the Chinook quota is still roughly the same as 1992, despite rebuilt runs and good to excellent abundance. This makes it important to continue saving fish for the summer fishery, which has taken the brunt of the treaty harms. Since most winter trollers also fish the spring and summer fisheries, these fish will still be accessible to them.

The proposer suggests that summer Chinook bring lower ex-vessel prices than winter fish. That's not always true. Salmon prices are subject to a wide number of variables, including supply and demand. For instance, some years the August fish are extremely valuable, while price nearly always drops at the end of the winter fishery when more of the fleet is fishing and spring kings hit the market from Canada and the Lower 48. The potential loss of coho fishing time, through closures or other management actions that could be applied to balance the impact of low Chinook quotas, must also be factored in when determining dollar value to the fleet.

311	Change troll coho opening date to June 1.	S	*
Neither ADFG nor ATA can recollect why the troll coho fishery starts on June 15 th . It's been that way since 1962, but there is historical record detailing why. Some think the reason was that the processors wanted to wait until the coho were bigger. Size is inconsistent throughout region, so that rationale makes little sense. This proposal would change the coho opening date to June 1, so that we can land coho during the spring fisheries. The areas are small and targeted on king salmon, so should cause no negative impacts to coho stocks or other users.			
312	Mandatory 10 day August troll closure.	O	
ATA strongly opposes implementation of a mandatory closure and questions the need to digress to old school management practices. The fishery is presently managed on wild stock coho abundance, which is evaluated in-season, based on real-time data. This form of sustainable management is Alaska's hallmark and has proven superior to arbitrary, fixed-length closures. It's likely that, in most circumstances, the proposers also prefer in-season management to fixed opening and closure periods for their own fishery.			
Proposal 312 states that conservation and allocation are not being achieved by the area managers and			

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requests the Board of Fish step in and curtail the troll fishery. No supporting documentation is presented by the proposers to support their claims.

The proposers claim that the troll fishery is having a negative impact on coho stocks, which is affecting inside fisheries. They fail to mention which ones. To our knowledge, no sport or gillnet fisheries have been curtailed as a result of the troll fishery, but we have been closed to assist gillnetters and anglers. The data doesn't reveal any correlation between troll openings and gillnet success rates. In fact, it shows that there is very little you can do to the troll fleet to move fish to inside waters, particularly in years that the fish want to hang offshore feeding or waiting for rain. It's interesting that the proposers claim that *'inside trollers'* will benefit. Do they not understand that the closure will affect all trollers?

We have talked with ADFG and are unaware of any specific coho conservation concerns. In fact, when managers see problems that trollers can impact, they simply close all or part of the troll fishery. ADFG pays careful attention first to conservation needs of the stocks, and then to the status of inside fisheries, prior to making decisions about troll closures. We work closely with the troll managers during the fishery, to make sure they have the latest information from the fishing grounds.

The allocative concerns in proposal 312 are also difficult to understand, considering that both the gillnet and troll fleets are consistently over their long-term average. Gillnetters nearly doubled their coho allocation in 2010, the very year this proposal was submitted. From 1989-2010, the gillnet fleet exceeded its allocation 50% of the time. Of course, all the fisheries have gone over their yearly allocations – trollers 68% of the time, seiners 4.5%, and setnetters 32%. But the largest annual relative deviation was landed by the gillnetters - at 92.3% - in 2010. Trollers' biggest annual relative deviation was 23%.

At 13.2%, it's the gillnet fleet, not troll, that shows the biggest positive divergence from the long term coho allocation. Setnet and troll relative deviations were 1.6% and 5.3%, respectively. The seine fleet deviation was -26% below the long-term allocation. Perhaps it is actually the gillnet fleet that should be closed for 10 days in August to account for their stated conservation and allocative concerns?

Seriously, there are many things that can account for low annual catch rates, or short and long term deviations from the allocated percentages. This can range from coho behaviour and size, to weather, to management changes over time, to what species is most abundant and/or valuable and affecting fishing choices. For instance, the gillnetters have put a lot of recent year effort into chum.

There is simply no correlation between the length of the troll closure and gillnet success rates. In fact, the gillnetters have had some of their best coho fishing in years with shorter coho closures. In 2000, trollers had a **10 day closure and the gillnetters caught just 11%** (2% below allocation) and trollers caught 67% (6% above). In 2003, there was **ZERO troll closure and the gillnetters caught 20%** (7% above) and trollers caught just 58% (3% below). In 2010, the troll closure was **4 days – gillnetters caught 25%** and trollers caught 60%.

Proposal 312 makes unsupported claims with respect to both conservation and allocation. The data clearly shows that the length the troll closure has little to no bearing on the inside fisheries. The coho fisheries are well-managed and all user groups are benefitting under an abundance-based system, which allows for variable length closures based on the needs of both the resource and all user groups.

313	Change troll coho closure date to Sept.30.	S	*
<p>The troll coho fishery is managed on abundance yet closes on a fix date, unless ADFG extends the fishery on Emergency Order. While fishery extensions under this provision are appreciated, they come at the end of the season on short notice, which has led to confusion and logistical difficulties for the fleet and processors.</p> <p>Recent years have seen increasing numbers of both hatchery and wild coho arriving late in the season, so</p>			

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it seems to make more sense to change the coho closure date to September 30. ADFG could manage according to the actual stock timing and abundance and has full EO authority to close the fishery before Sept. 30, if conservation and/or other regulatory goals dictate.

314	Leave troll fishery open in D1, 6, and 8 September 20-30 if gillnetters are fishing the areas.	S	
315	In Section 1-E redefine open area and extend troll fishery from Sept. 20 to Sept. 30.	S	
316	In Sec. 1-E redefine area open to trolling.	S	
317	Redefine area and extend trolling in part of Sec.1-E (Neets Bay) to at least Sept 30.	S	*

We are looking for ways to access late returning hatchery coho to Neets Bay later in the fall. This could help with the hatchery imbalance and to ensure our hatchery stocks get caught. There are very few boats that would fish in the tougher weather, and ADFG could always close the area if there were conservation concerns in low abundance years.

It is interesting to note that late returning coho are not unique to Neets Bay. Hatcheries around the region, and some wild systems, have also been seeing an increase in late returns. For instance, the majority of Armstrong-Keta's (AKI) cost recovery coho are caught during the second half of September and they are still catching the first half of October. AKI uses the same coho broodstock as Deep Cove and Hidden Falls, which could have similar migratory behaviour.

318	Clarify when Sec. 1-F is open to trolling.	S	
319	Open Chichagof Pass to trolling 7 days to access Anita Bay chum.	S	
320	Increase troll area in 11-A for Taku R kings.	S	*

See comments at Proposal 284.

Proposal 320 would make a single line adjustment in 11-A. The line is currently drawn from Piling Point to Middle Point and we suggest a making it Piling Point to Outer Point. The Middle Pt line does not follow the natural contours of the area, making it difficult to fish. The change would also allow a more orderly fishery. The Middle Point line creates an awkward angle, so you could bottleneck with any boat – sport or commercial - fishing the beach on the back side of Douglas Island. The Outer Point line would relieve this type of conflict. Given the low effort and extremely low catch rate by trollers fishing the directed Taku Chinook fishery, this line change is not expected to negatively impact other users.

321	Amend closed waters for the Situk R troll fishery.	S	
322	Amend closed waters for the Situk R troll fishery.	O	
323	Hatchery allocation limited to production by regional aquaculture corporations.	O	
324	Separate hatchery allocation by north & south.	O	
325	Redirect spring troll management to target hatchery chum salmon to address allocation.	S – w/amendment	

ATA supports proposal 325, with an amendment deleting these two areas: (i) Althorp (114-50); and (iii) District 9 . We don't want Chinook taken by trollers fishing for chum to be counted in the designated

Alaska Trollers Association 2012 Board of Fisheries Positions

spring troll areas. This could prematurely close important spring Chinook fisheries targeting hatchery fish. The proposers have informed us that they agree with these amendments.

Trollers have been harvesting more hatchery chum salmon in recent years. This area is estimated to be catching 85% DIPAC hatchery chum. Trollers have been able to enhance chum harvest values to the fleet and state, by delivering a quality product utilizing troll bleeding and cleaning techniques. This is producing positive benefits for fishermen and local communities. An added benefit is that these deliveries help to offset the hatchery allocation imbalance.

Trollers pay 35% of the Southeast Salmon Enhancement tax, but are realizing less than half that amount when it comes to allocating the value of the hatchery program. In 2011, trollers caught only 19% of their 27-32% allocated range. This amounts to around \$4,000,000 of unrealized income for the fleet. The Icy Strait chum fishery provides an ideal opportunity for trollers to increase their allocated share without disrupting existing hatchery terminal area net fisheries.

326	Provide hatchery chum fishery in 11-A to address enhanced salmon allocation imbalance.	S	
See general comments on proposal 325.			
331	Revise Neets Bay management according to SSRAA's annual allocation plan.	S	
333	Remove 1:1 gillnet to seine fishing rotation schedule for Neets Bay hatchery common property openings after the 2011 season.	O	
Could further exacerbate the hatchery allocation imbalance.			
334	Continue 1:1 gillnet to seine fishing rotation in Anita Bay THA through 2017.	S	
335	Continue 1:1 gillnet to seine fishing rotation in Deep Inlet THA through 2017.	S	
337	Establish new Herring Cove THA management plan to distribute harvest amongst user groups.	S	
338	Expand Kendrick Bay THA to include McLean Arm for seiners.	S	
340	Modify area in Anita Bay THA to enhance quality.	S	
341	Establish a THA in Southeast Cove for seine/troll.	S	
343	Open Hidden Falls THA to trolling Aug 1 - Sept 20.	S	
ATA is hoping to provide additional opportunity for the fleet to harvest hatchery coho.			
344	Revise Deep Inlet THA boundary and season to increase troll access to enhanced Chinook.	S	

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ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear BOF and Boards Support,

This letter is in support of the Chum Trollers Association (CTA) Board of Fisheries (BOF) Proposals # 325 and # 326. Our company, Sitka Sound Seafoods, a subsidiary of North Pacific Seafoods Inc, has been processing salmon for fifty plus years in SE Alaska. Sitka Sound Seafood pioneered the purchasing of round troll pinks and chums beginning in 1990. High quality round chum and pink salmon troll deliveries continue to be important to our company.

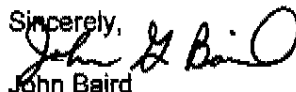
We have read proposals 325 and 326 and agree with CTA that passage of BOF proposals 325 and 326 will facilitate orderly development and management of the chum troll fishery.

The details of the SE enhanced salmon allocation plan and that trollers are well below their allocation, over \$4 million short in 2011, are well known to us. We understand that as a long-term policy CTA would rather not see hatchery salmon taken from another gear group but development of existing and creation of new opportunities for the troll fleet. We agree with that approach as we buy salmon from other gear groups. We understand these proposals are carefully chosen not to displace any other gear group but to allow better troll access to hatchery chums.

Trollers have proven they can effectively catch chums at multiple sites. In 2011 ADF&G reports indicate trollers harvested over 680,000 chums in SE Alaska for an estimated ex-vessel value of over \$4 million. In Icy Straits in 2011 estimates are that trollers harvested 175,000 chums and 345,000 pinks for an estimated value of over \$1.6 million.

Proposal 325, as amended by the SE enhanced salmon Joint Regional Planning Team (JRPT) proposes a chum troll management plan for Icy Straits where trollers are currently targeting hatchery chums under Chinook hatchery management and on the North West Admiralty shore where there are known concentrations of hatchery chums in late June. The JRPT has endorsed this proposal with amendments we support.

Proposal # 326 proposes a chum troll fishery in a small part of District 11A the first 20 days of July. We think this proposal will provide increased troll opportunity on enhanced chum salmon and will improve access for trollers in the Juneau area. Troll harvest of these hatchery chums, now that Douglas Island Pink And Chum is retiring its debt, brings trollers closer to their share of enhanced salmon value and moves a good percentage of these troll caught chums into processors around SE Alaska.

Sincerely,

John Baird

General Manager Sitka Sound Seafoods

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(907) 486-5164

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Attn: BOF Comments

Board Support Section

Alaska Department of Fish and Game

P.O.Box 115526

Fax: 907 465-6094

Attn: Shannon Stone

Dear Chairman Johnstone and Board of Fish Members,

This letter is in Opposition to Proposals 230, 231, 232, 238, & 239; and In Support Proposal 273

Oppose Proposal 230 – apply ecosystem management to Sitka Sound herring management.

The current ADF&G management plan is not limited in scope and relevance, quite the contrary. It is extremely thorough in real time visual (mammal, and bird activity) and acoustical information (from the ADF&G research vessel), as well as dive surveys to measure spawn density, spawn substrate, spawn depth and quality of spawn. The department and their team have done an outstanding job of managing the resource and maximizing opportunity for all user groups. The current harvest rate of 20% is very conservative and certainly biologically defensible. This proposal has no merit.

Oppose Proposal 231 – require ADF&G management to shutdown Sitka Sound herring fishery when GHL is within 10% of harvest quota.

The ADF&G again has done an exemplary job of managing the Sitka Sound Herring Fishery. It has been under the harvest quota by 2% in the past 10 years! The latest historical data, and spawn deposition, show the biomass has been underestimated in 10 of the last 12 years. With this in mind, the harvest quota could have been even higher considering the current conservative 20% harvest rate. Managing to such a degree with this accuracy considering all of the area, and needs of all users should be commended. The consideration they have put forward in personal and professional understanding of the needs of each user group, along with the high degree of technically trained scientists is one we should be proud of. The outstanding health of these herring stocks for future generations is a testament to the department and their excellent management practices.

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should be proud of. The outstanding health of these herring stocks for future generations is a testament to the department and their excellent management practices.

Oppose Proposal 232 – change harvest formula from 2 + 8 (spawning biomass in tons/25,000) to 8 + 2 (spawning biomass in tons/25,000)

The 2 +8 formula used by ADF&G in Sitka Sound is conservative for its large population size. In ten of the past eleven years the 2+8 formula resulted in a 20% harvest rate, and during that same time period the population has grown from an estimated 53 ton biomass to 145 tons! ADF&G has been very diligent in seeking outside consultants and experts to review their ASA models and recommendations.

There is no biological basis for changing the formula.

Oppose Proposals 238 &239 – Establish subsistence only harvest in Core area - Makhnati to Gavanski to Crow Is. to Halibut Pnt., along roadside to breakwater.

There is no information to support that the subsistence opportunity has been diminished in recent years. Considering the increasing stock abundance and spawn distribution, it is more likely that the subsistence opportunity is greater than it has been since ADF&G began managing this resource.

ADF&G has been extremely understanding of the need to provide opportunities to the subsistence harvesters, and giving reasonable opportunity to harvest roe on branches. This is most notable with the vast majority (some 80%) of the sac roe harvest being taken outside the “Core Area” from 2002 to 2010! Staying out of the core area is not always possible considering the nature of spawning patterns from year to year; however ADF&G prioritizes in trying to minimize the harvest in this area while still providing opportunity to prosecute a sac roe fishery.

The “perceived” lack of subsistence harvest is more realistically a function of reduced effort and participation, weather, and spawn distribution. Considering these parameters, there are groups and individuals that have in the past and will in the future, assist in helping meet the needs when traditional means might fall short.

The subsistence needs can be met with the current sac roe fishery management plan.

Support Proposal 273 – Establish an accounting system for herring egg harvest in Sitka Sound through permit or sampling program.


There is no current meaningful accounting system for monitoring the harvest of herring eggs on branches. Mail in “household” surveys is not reliable. Considering the nature and importance for both subsistence and sac roe harvesters, the need for accurate, transparent and science driven data, is

imperative for accurate analysis to predict biomass of the Sound. The ADF&G could have dockside surveys where samplers would interview harvesters and use survey methodology such as weight, size, harvest methods and numbers of harvesters.

This should not be considered an affront to the subsistence users, as there are other current programs such as subsistence halibut where permitting is required. Rather this would be a scientific and transparent measure to help in management practices to insure future sustainability.

Thank you for your time and the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "John Baird". The signature is fluid and cursive, with the first name "John" and last name "Baird" clearly distinguishable.

John Baird

General Manager

Sitka Sound Seafoods

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February 5, 2012

Attn: BOF Comments

Board Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Fax: 907 465-6094

Attn: Shannon Stone

Dear Chairman Johnstone and Board of Fish Members,

My name is John Baird, I am the General Manager at Sitka Sound Seafoods, a subsidiary of North Pacific Seafoods Inc. I reside in Sitka at 713 Katlian St. in Sitka and have been an Alaska residence for some 36 years.

First let me say, Thank you for your time and commitment acting on this board, and secondly to my opportunity to comment here. I have submitted written testimony speaking against Proposals 230, 231, 232, 238 & 239. And in Support of Proposal 273

My comments to follow are a general summation for my positions.

I have been involved in many Alaskan fisheries, starting at age 18 as a fisherman, and now working on the processing side for some 26 years. I have lived in Southeast Alaska and been directly involved in the Sitka Sac Roe fishery for 17 years as a fleet and Plant manager. My wife and I raised two children in Petersburg, both of whom have worked in the fishing industry and specifically in the Sitka herring fishery on tenders. We count ourselves lucky to have had the opportunity to see this herring fishery come from meager biomass and catches to extraordinary biomass and catches in those 17 relatively short years. I think this tremendous volume of fish we are seeing is a true testament to the ADF&G and their science, management, and model, in the health of the ecosystem in Sitka Sound today.

Unfortunately this management team and its obviously successful program (of which you will see, plenty of scientific data to back it up) is being put into question by proposals and formulas (230, 231, 232) that have no biological basis and would depart, as I said previously from a program that is working well!

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Furthermore, proposals (238 & 239) to establish a subsistence only harvest in the "core area, show no information to support that their subsistence opportunity has been diminished in recent years. Considering the increasing stock abundance and spawn distribution, it is more likely that the subsistence opportunity is greater than it has been since ADF&G began managing this resource. Only 20% of the quota has been taken between 2002-2010 in this "core area" The department has been extremely understanding of the need to provide opportunities to the subsistence harvesters and to deny this is just plain wrong. From its inception to its end, I had the opportunity to serve as the processor liaison on the herring task force committee comprised of ADF&G, STA, Seiners, and Processors associated with the MOA (memorandum of understanding) and fishing information given to STA before each opening. ADF&G was always considerate in these meetings of the needs and opportunities for the subsistence harvesters. The "perceived" lack of subsistence harvest is more realistically a function of reduced effort and participation, weather, and spawn distribution. Considering these parameters, there are certainly groups and individuals that have and will in the future, assist in helping meet the needs when traditional means might fall short.

What will diminish if these proposals go through is the lack of viability of the sac roe fishery and all the economies that are tied to it. Having the opportunity to fish the "core area" at times is absolutely necessary. Taking this area and opportunity away from the sac roe fishery marginalizes the opportunity to supply markets. If you can't supply the markets you lose the markets, if you lose the markets you lose jobs... lots of jobs! You have heard testimony and will hear additional testimony with more detail in the economies of this fishery. Sitka Sound employs upwards of 50 local folks, as well as some from neighboring villages, and you will hear of even larger employee numbers from other plants in the region. Additionally and in even greater numbers will be jobs lost from seine and Tender operations, fuel companies, grocery stores, fishery supply stores, Motels, packaging manufactures, the list goes on and on. Those are just the jobs lost, now try and imagine all the lost revenue from these businesses and the number is staggering.

Dave Gordon and all the staff that manage this fishery have done an outstanding job in their hard work, professionalism, and consideration for the all users of this resource. They have indeed carried out the state of Alaska mandate to "manage the resource sustainably and to maximize benefit for all the people of Alaska".

I strongly urge you to let them continue this work using their methodology that has brought this success.

Again, Thank you for your time and the opportunity to comment. I plan on being here for the duration of the meetings and look forward to having the chance to visit with you again, and I would also appreciate your consideration to serve on any committee that discusses these proposals.

Sincerely,

John Baird

General Manager Sitka Sound Seafoods

Board Support Section, ADFG
PO Box 115526
Juneau, AK 99811-5526

Dear Chairman Johnstone and Members of the Board,

I am a commercial fisherman and live with my family in Sitka, Alaska. Our family depends on commercial fishing for our livelihood, but fishing is also a way of life we have chosen that allows us to run our own business, work together as a family, and provide a valuable product to the public. We are committed to sustainable fisheries management, and want our two boys to have the same opportunities that we have had to make their living harvesting Alaska's abundant fishery resources.

I strongly oppose proposal 212, reallocate demersal shelf rockfish to the charter fleet

Over the 30 years that I have fished, I have participated in both the halibut fishery and the directed rockfish fishery. Halibut fishing provides half of our family's annual income, and the rockfish we catch and sell during the halibut fishery is an important component of that income. Because rockfish are long-lived and easily overfished, we also work hard not to exceed rockfish bycatch allowances on our halibut sets. We joined the Fishery Conservation Network (FCN) launched by the Alaska Longline Fishermen's Association (ALFA) in 2009, and have participated in both the bycatch logbook program and the habitat mapping program. The maps the FCN creates from our data have improved our fishing efficiency and our ability to control bycatch. I am well aware of the hard work and resources ALFA has committed to creating and refining the FCN, and proud to be part of this effort.

In proposal 212, SEAGO claims rockfish bycatch is unavoidable. Clearly SEAGO members are not making any effort to avoid rockfish, because most of them are effective at finding and catching the fish their clients want. If you reward their irresponsible behavior toward the resource, you will be punishing those of us who have worked to be good stewards and encouraging overharvest. DSR allocations were set by the Board six years ago based on historic harvest. The commercial fleet has adhered to the allocations; the charter fleet has not. I am sure you do not want to send the message that more fish will be granted to sectors that exceed their allocations?

Please do not adopt proposal 212. If anything, the commercial fleet deserves more rockfish, not less.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent Barkhau", written over a horizontal line.

Kent Barkhau

Board Support Section, ADFG
PO Box 115526
Juneau, AK 99811-5526

February 8, 2012

Dear Chairman Johnstone and Members of the Board,

I OPPOSE proposal 212: reallocate rockfish from the commercial to the charter fleet. The rockfish allocation was set in 2006 after careful review and deliberation by the Board to fairly allocate between sectors based on historic harvest. The commercial fleet has not taken its full allocation over the past six years because halibut stocks are down and, since rockfish bycatch is allocated as a percentage of halibut catch on board, that has reduced the amount of rockfish available for commercial harvest. When halibut stocks recover, the commercial harvest of rockfish will once again increase.

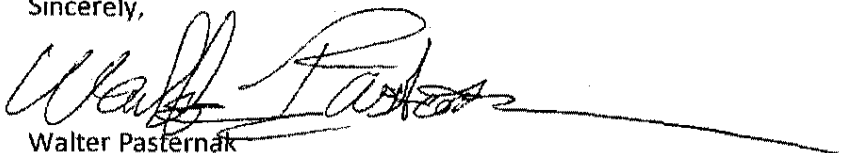
This year, for the first time in six years, ADFG allowed a directed rockfish fishery in central southeast outside. The rockfish harvested by local boats and delivered to community-based processors during this directed winter fishery provides an important income during the winter season when little other fresh seafood is available. This fishery would not have opened if the commercial allocation was any lower.

I am a member of the Alaska Longline Fishermen's Association's Fishery Conservation Network. ALFA started this network in response to the Board's challenge in 2006 to learn to live within rockfish allocations. By recording rockfish bycatch rates and mapping habitat, the FCN has provided commercial fishermen with tools to control rockfish bycatch rates. We will keep harvesting the rockfish that we are allocated because the economic value is important to our fleet, but we will be able to control bycatch rates to avoid overharvest.

SEAGO is asking for more rockfish and claiming they can't avoid rockfish bycatch. The request is based on greed and laziness. Because they have exceeded their allocation in three of the past six years they believe they are entitled to more fish. That kind of fishery management bankrupted fish stocks on the East Coast. We expect better from fishery managers in Alaska.

Please reject Proposal 212

Sincerely,



Walter Pasternak

January 29, 2012

RECEIVED
FEB 03 2012
BOARDS

ATTN: BOF Comments
Boards Support Section
Alaska Department of Fish and Game
P.O. box 115526
Juneau, Alaska 99811-5526

Fax – (907) 465-6094

RE: Support of Commercial Sac Roe Herring Fisheries – Sitka, Alaska
Support of Mr. Steve Demmert's Subsistence Harvesting

Dear Chairman Johnstone and Board of Fish Members:

I have been a resident of Sitka for 27 years. I am an Alaskan Native and an enrolled Tribal Citizen in Tlingit & Haida and Sitka Tribe of Alaska.

For many years several of my family members have participated in the sac roe herring fisheries in Sitka. To date, my son is an active participant in the sac roe herring fisheries, this is his twelfth season. Alaskan Native ownership in sac roe herring permits equals 18%, 29% if you include spouses and other family members. Sitka Tribe of Alaska citizen participation in the fisheries equals 6%. Fishing herring in the Sitka Sound area is an important fishery for all permit holders, crew and their families.

Additionally, while it is not addressed in a specific proposal for consideration by the Board of Fish, I would also like to express both my appreciation and support for the subsistence harvest effort provided in recent years by Mr. Steve Demmert and the crew of the F/V Julia Kae. Furthermore, as a Tribal Citizen, I was disappointed that some within the Sitka Tribe took great measures to have this specific gathering and dispersal terminated, and in essence, created a void by eliminating the opportunity enjoyed by many to receive herring egg on branch. Gunalchéesh to Mr. Demmert for his years of harvesting and distributing herring egg on branch!

In closing, I want to reiterate my support for the current ADF&G management of the commercial Sitka Sac Roe Herring fishery and note my opposition to any proposal that poses restrictions (either in area or opportunity) beyond the framework and guidelines that ADF&G currently utilizes.

Thank you for your time and service.

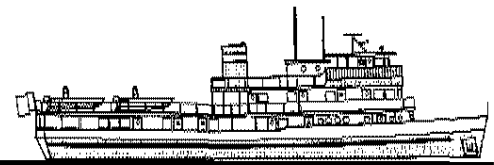
Sincerely,



Betty Jo Moore
1972 Halibut Point Road
Sitka, Alaska 99835

THE BOAT COMPANY

Captain Joel Hanson, Alaska Conservation and Vessel Support
417 Arrowhead Street, Sitka, AK 99835 Tel/Fax: (907) 747-9834 Cell: (907) 738-1033

**Wilderness Adventure Tours****VIA FACSIMILE TO 907-465-6094**

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

Re: Proposal comments for the February 24—March 4, 2012 Southeast and Yakutat Finfish
Board session:

Proposal 210 - Support

-Require release of demersal shelf rockfish at depth.

This is a good conservation measure. Demersal rockfish suffer barotrauma when brought to surface from depth, yet high rates of survival can be achieved if fish are released through various means back into deep-enough water such that they are no longer buoyed by a ruptured air bladder and protruding stomach.

Proposal 211 - Support

-Require release of rockfish at 40 feet or greater.

This is similar to the previous proposal and promises to provide similar results. While we are generally in support of this proposal, we feel that the 40' stipulation may be difficult to enforce, and thus prefer the less exacting language found in Proposal 210.

Proposal 213 - Oppose

-Establish a point system for the retention of rockfish

While this system may be well-intentioned and designed to help prevent the possibility of seasonal or area closures to sport fishing, we feel it is overly complex and not appropriate in areas where rockfish populations are not depressed, nor where sport fishing pressure is light. Such a system may be appropriate and beneficial if applied on an area-specific basis, where and when necessary.

Proposal 216 - Oppose

-Repeal the nonresident sablefish annual limit.

Concerns persist regarding the health of the Chatham sablefish population. Until such time as commercial catch limits in this area are seen to increase from year to year, rather than decrease as has been the case for some time, the nonresident sablefish annual limit seems appropriate.

Proposal 248 - Oppose

-Change the definition of "bag limit" for anglers fishing from a vessel.

Sport fishing is not generally considered a team effort, but is often a solitary pursuit. The pooling of bag limits among a number of anglers fishing from a vessel effectively demeans the efforts of the solitary angler, and may tend to increase the overall sport catch over time, creating resource or allocation concerns.

Proposal 249 - Oppose

-Establish nonresident annual limits for sockeye, coho, chum, and pink salmon in the Southeast Alaska Area.

This proposal unintentionally appears to discriminate against nonresident sport anglers who target sockeye, coho, chum and pink salmon in southeast Alaska, while at the same time apparently allowing nonresident commercial fishermen on board seiners, trollers and gillnetters in this area unlimited opportunities to retain of a portion of their commercial harvest of these species as "home freight." While there can be no doubt that nonresident sport anglers are responsible for a substantial amount of salmon removals, there should be clear conservation reasoning behind imposing annual limits on this group, and the limits should apply to all nonresident harvesters of the resource, commercial and non-commercial alike. It is, after all, not uncommon for out-of-state crew members off commercial fishing vessels to ship or take boxes of fish home at the end of a season, just as nonresident sport anglers are wont to do at the end of a fishing holiday.

Proposal 269 - Support

-Establish a catch report card system for subsistence, personal use, and sport finfish fisheries.

The need to guarantee the sustainability of Alaska's fisheries resources trumps personal inconvenience concerns over time. Accurate catch records help fisheries managers set escapement targets from year to year, or even in-season. If catch report cards are used by subsistence, personal use and sport finfish fisheries in other states, a similar system should be analyzed for adoption in Alaska.

Proposal 270 - Support

-Require a permit for subsistence or personal use harvest of sablefish.

Concerns persist regarding the health of the Chatham sablefish population. This proposal will help by accounting for subsistence and personal use removals in this area.

Proposal 294 - Support

-Require reporting of commercially-caught salmon and steelhead retained for personal use.

The author claims that "...virtually no [personal use] fish are reported on fish tickets." This is unsubstantiated, but if true then we support the proposal. If, however, some commercial fishermen in fact do report their personal use harvest on fish tickets, but many do not, then there is the potential to address the issue through improved enforcement action, and the proposal may be of little benefit.

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

Thomas B. Botts
P.O. Box 424
Hoonah, Ak
99829

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FEB 06 2012
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Dear Members of the Board:

I would like to take this opportunity to comment on several of the proposals that are before you at this meeting.

Proposals 325 and 326 involving the harvest of hatchery chum salmon by trollers. I'm a resident of Hoonah and for the past two years have taken part in the chum salmon troll fishery in Icy Strait. It has made a tremendous difference in my bottom line to be able to target these fish. Being able to fish so close to home has been a great blessing, both in fuel costs and convenience, but the best thing overall has been the increase in profit that I've enjoyed. It couldn't come at a better time. I'm finally able to afford some badly needed repairs to the boat that just wouldn't be possible if this fishery weren't available.

I would like to express in the strongest terms possible that I vehemently oppose proposal 312. As you are aware, trolling is the least effective means of catching fish. Our season's have been pared back down through the years and a mandatory ten day closure is an additional hardship to have to deal with. Many in the troll industry are also involved in the halibut fishery and we are struggling to make ends meet with the drastically reduced quota. Please don't impose any further restrictions on this already struggling fishery.

Sincerely,



Thomas B. Botts
F/V Bonnie J

February 8, 2012

This is our response to the Herring Cove sport fish proposed changes:

My husband and I both agree to setting a time limit of 7am to 7pm for beach fishing. This will certainly help reduce the early morning (3:30) and late evening (10:30) snag fishing activities, which can be exhausting as sounds travels. It especially is serious when some fisher people are intoxicated.

We also agree that setting a mean tide limit is equally important due to fisher people often getting caught at high tide and having to trespass on local private properties or even continuing to fish directly under a deck or several feet within a private residence leaving trash.

We are not as concerned about snagging fish.

We are, however, very concerned about the lack of a small bathroom facility. Urination and defecation has been witnessed during the day. People fish for hours, bring containers with food and drink and are in need of relief.

If some of these changes are approved, we hope that it will be randomly enforced so people will respectfully know that these are serious changes due to concerned local residents, as well as Fish & Game concerns for local habitat, wildlife and sport fish.

To help alleviate the grossly large impact of sometimes groups of 40-50 people (we have counted, NOT including visiting tourists from vans and taxis) fishing directly in front of the Brand's residence, the THREE right-of-ways need to be clearly marked. Over the past several years, property owners have blocked off and posted signs to stop people from using these right-of-ways which belong to all the people in the Ketchikan community and it's visitors. Please check accurate maps in government offices for right-of-way locations.

We believe that all of the above will be beneficial to our community in that it will help reduce the ever-growing congestion in Herring Cove, a progressively popular tourist site.

Liz & Curtis Bower
8332 S. Tongass

Att ; BOF comments
Boards support section
Alaska department of fish and game

In regards to proposal #337 herring cove. Since 1999 the residents of herring cove have been asking for help in the management of the fishermen in the cove . as you are aware the fishery has grown and so has the influx of people. We are requesting that no snagging be allowed in the cove for reasons listed

Miles of line that the seals, eagles and bear get caught in.

The beach is unsafe to walk because of treble hooks

It is a safety issue for the workers of the hatchery

I am sure that the lead levels in the creek area are very high

Second there be a time line from 7am to 7pm since the cove is a residential area and people are fishing at all hrs

It will also be coordinated with a low tide time limit 2hrs before and 2hrs after; it will give law enforcement something to work from.

The time line will also give the bears time to come eat as should be

There are no restrooms ,garbage receptacles or safe access.

We would also like you to take responsibility for the fishermen so we as home owners are not liable.

Dennis and Janet brand
8230 south tongass hwy
Ketchikan Alaska

ATTN: BOF Comments
Board Support Section ADFG
PO Box 115526
Juneau, AK 99811-5526

Fax: 907 465-6094

Dear Chairman Johnstone and Board Members,

Subject: Oppose 216 and 212

I have been a commercial longline fishermen since 1976, and own and operate a 54 longliner out of Sitka where I live. I also have served on the Sitka Fish and Game Advisory committee for 5 years. I care deeply about sustainable resource management and our State.

I strongly oppose proposal 216. The Chatham Strait sablefish population has continued to decline since the last Board of Fisheries Cycle. This decline in biomass was 16% between 2010 and 2011 and there is a downward trend since 2002 as evidenced by this graph from Sherri Dressel, ADF&G groundfish biometrician and included in a memo 7/16/2011 from Ms Dressel to Ms. Green (Groundfish Project Leader) discussing Chatham sablefish.

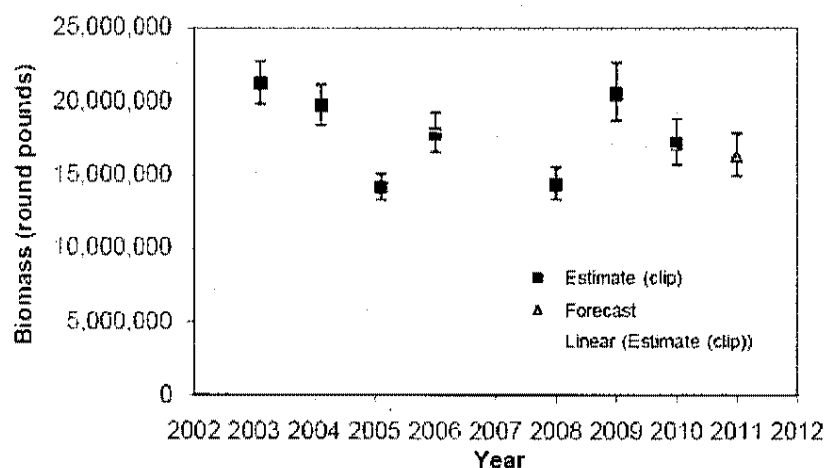


Figure 1. Petersen estimates of exploitable biomass with the 2011 forecast and 90% confidence intervals. Unlike previous years, the 2010 estimate has been adjusted to account for selectivity of the commercial fishery (both gear selectivity and highgrading). Unlike previous years, the 2011 forecast accounts for differing selectivity by age class allowing the forecast to be greater than the previous years' estimate.

It would be irresponsible at this time to remove the annual limit for non-resident anglers. The effect of this proposal would be an increase in catch of these fish to the newest user. The Board of Fisheries Allocation Criteria speaks directly against this type of action. Non-resident anglers are already given an opportunity to catch sablefish with the current generous daily bag limit. These bag limits allow non-residents to take home a significant amount of fish while still allowing local traditional fisheries to continue. There is no reason for non-residents to take home large quantities of each high value fish they catch –

their combined daily and annual limits for all species provide more than ample eating for the year. If they need more fish than this they should be supporting local businesses that sell commercial fish for take-home like Absolute Seafoods, Alaskan's Own, and Sitka Sound Seafood and Quality in Sitka. There are small tourist oriented businesses in all our communities that ship local fish anywhere.

I also oppose Proposal 212. I attended the meeting in Ketchikan when this allocation decision was made. As a longline fleet we have worked hard to conserve the resource and have worked hard to reduce bycatch. When the halibut stock rebounds (and it is increasing this year in 2C) the longline fleet will need this allocation and our hope is the rockfish stocks will be strong. The charter fleet should be working at reducing their bycatch of rockfish not increasing their allocation. The rationale for this proposal is that since the charter fleet is going over its allocation and the commercial fleet has remained under, the charter fleet is entitled to more fish at the expense of the commercial fleet. I am a member of ALFA's Fishery Conservation Network and I would advise the charter fleet to develop a similar program – their clients would benefit and likely support this effort. Both SEAGO (210) and the Sitka Fish and Game Advisory Committee (211) have proposals requiring rockfish in excess of bag limits be released using a release device which will allow sport anglers the opportunity to catch rockfish without resulting in exceeding their allocation. This is more appropriate and accomplishes the same thing without punishing good behavior and rewarding bad behavior. This proposal was first made in Sitka last cycle and if it had passed the charter allocation may not have been exceeded.

In closing, I hope the Board action follows their Allocation Criteria in a meaningful way, opposing both these proposals.

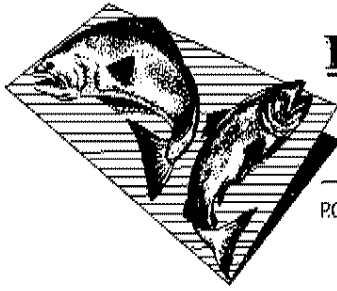
Thank you for your service,

Sincerely,



Dick Curran

PRODUCERS AND WHOLESALERS

**E.C. PHILLIPS & SON, INC.***Fresh-Frozen Alaska Seafood*

P.O. BOX 7095 • KETCHIKAN, ALASKA 99901 • 907-247-7975 • FAX 907-225-7250 • ecphillips@ecphillipsalaska.com

Board of Fisheries

February 24 – March 4, 2012

Dear Chairman Johnstone and Board of Fish Members:

Oppose Proposals 238 & 239 – Establish subsistence only harvest in Core Area – Makhnati to Gavanski to Crow Is. to Halibut Pt., along roadside to breakwater.

E. C Phillips & Son submits these comments on proposals you will be considering at the upcoming meeting concerning fisheries in southeast Alaska. The Sitka Sac Roe fishery allows E. C. Phillips to operate during a time of the year that we would otherwise be shut down as a result of decreasing halibut and black cod quota's in area 2C.

Processing of sac roe herring allow E. C. Phillips to provide 90 processing jobs in the Ketchikan community regardless of price that the processors sell the herring for or the ex vessel price the fisherman receive. Additionally E. C. Phillips will contract approximately 15 fish tenders to haul herring down to Ketchikan. The barge companies must bring supplies to Ketchikan in the months leading up to herring season and haul all the herring out of Ketchikan to sell it. Economic stimulus resulting from that herring trickles down in the Ketchikan community and positively affects everyone from store and restaurant owners to insurance companies and fuel purveyors.

Sincerely

Paul J. Cyr
General Manager
E. C. Phillips & Son Inc.

Richie Davis
2347 Kevin Court
Juneau, AK 99801

February 6, 2012

Attn: Board of Fish Comments
Boards Support Section
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Hello Chairman Johnstone, and Alaska Board of Fisheries Members,

I'm Richard Davis of Juneau, Alaska as well as being a lifelong Alaskan Resident Angler for the past 45 years. The commercial fisheries of Southeast and the Eastern Gulf of Alaska have sustained myself and my family. All of my income is obtained from participation in the commercial salmon, halibut, blackcod and misc. bottom fish harvest. I and 2 of my young adult sons are still reliant upon healthy, vibrant commercial harvest opportunities.

I strongly **OPPOSE** Proposals 212, 216, 217, 220 & 221 All lingcod allocation change proposals should be stringently resisted. Tremendous effort from all user groups, F&G Advisory Committees, and the Dept culminated in a consensus management plan, complete with allocations, adopted in the mid-nineties by the Board of Fish. The regionally comprehensive resultant plan for lingcod harvest allocation needs to be preserved, and not revised or undermined by the desire of a single user group or individual.

I also OPPOSE Proposals 250, 251, 255, 260, 261, 274, 277, 278, 279, 299, 310, 312, 320, 323, and 324.

I SUPPORT Passage of Proposals 215, 224, 253, 269, 284, 308, 311, 328, 330, 334, 335 & 334.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richie Davis', written over a horizontal line.

Richie Davis

Steve Demmert
F/V Julia Kae

January 7, 2012

Board of Fisheries
February 24-March 4, 2012

Dear Chairman Johnstone and Board of Fish Members:

Re: Oppose Proposals 232, 238, & 239; Support Proposal 273

Please consider this letter testimony in response to Proposals 232, 238, and 239 regarding closure of the Sitka Sac Roe Herring fishery in the "core area" near the airport and downtown, and the method of determining the harvest quota based on total biomass. Also, please consider this letter support of Proposal 273 for permitting and documentation of the Subsistence Herring Egg on Branches fishery in Sitka Sound.

As a participant in the fishery for over 25 consecutive years as a small tender and participant for three years as a provider of subsistence eggs on hemlock branches, **and understanding the Petitioners' position that subsistence needs are not being met because of the commercial fishery**, I can bring some insight into the lack of egg harvesting to fill a perceived subsistence need. I have tendered the Sac Roe fishery for over 25 years on 58 foot seiners that I have owned. But first of all, a brief history of how I was asked to participate in the subsistence harvest of herring eggs on branches for the purpose of providing for the community of Sitka, and subsequently other communities around Southeast.

In March 2008, when I purchased the *Alice H* from Sitka's own family, the Enlocs, after Sonny's death, I was asked if I would carry on Sonny's tradition of bringing in egg covered trees to give away to the community. I didn't have to think very long or very hard about what an honor it would be to follow in his footsteps and continue to use his boat (albeit with a new name) to help feed the need. As a Ta Kwan Na Di/Eagle Tlingit who is a member of the Demmert family originally from Klawock/Craig, it also struck a chord in me to respond to my upbringing to help others when asked. Demmert family members have a long standing history in Southeast Alaska as teachers and healthcare providers and of course, fishermen. All are professions which provide in one way or another to the betterment of the communities in which they live.

The Sitka Tribe of Alaska has, for years, been stating that their subsistence needs have not been met. The Tribe identified a problem and has been trying to blame the commercial fishery for the apparent lack of eggs to fill their needs. In 2008, Industry listened and came to me, an Alaskan Native, to harvest eggs for the sole purpose of bringing them to the people for free distribution under Customary and Traditional Harvest by a legally enrolled Alaskan Native. Our first year we were not very well prepared with mostly borrowed equipment (I was asked very late before we needed to start working) except for my seiner which we used as the transport and distribution platform. Still we brought in an estimated 15,000 pounds and gave it all away for free at the dock in Eliason Harbor in Sitka. The second year we were better prepared and had a plan before we set out.

That year, 2009, we began actually weighing our harvest with a State of Alaska certified scale and keeping records of how many trees we set, where we set them, how many trees we harvested and what our daily harvest was in pounds. Some trees were lost or were not recovered because our set lines were cut and some obviously stolen before we could get back to them. On one occasion we actually came upon a skiff with local occupants in it pulling one of our sets. When we confronted them they stopped pulling but cut our set line, watched it sink, and backed off, making it difficult for us to harvest that set. Still we harvested 25,000 pounds that year, excluding tree boles, just egg laden branches. At one point we had

trees on deck, headed into town and I asked one of the local crew members (who had crewed for years with Sonny Enloe in many fisheries including harvesting eggs on branches to give away) what they would have estimated the load on deck to be. He confidently replied they would have called it 10,000 pounds! The actual weight from our scale measurement was close to 2,700 pounds. It was then that I started to referring to harvests as “perceived weight” and “actual weight”. I believe all other harvests can reasonably be considered “perceived weight” harvests and in 2009 and 2010 our harvests were “actual weight” harvests. We are the only ones actually weighing our harvest and the only ones with hard data to contribute to the science, all other efforts are only best guesses and estimates. Additionally, after each day’s distribution we left the harbor to return branches to the sea that were not taken from our deck so they could subsequently hatch or feed marine wildlife.

2009 saw us with a surplus of eggs on branches to the community of Sitka proper when a second boat was brought in by the Southeast Herring Conservation Alliance to harvest trees to provide the last demand in Sitka. After five days giving away eggs at the harbor we loaded the hatch with the last of our sets and departed to provide to the communities of Hoonah, Angoon, and Kake. In Hoonah over 110 people flooded the dock to partake in our bountiful give-away on Easter Sunday and proclaimed it was the best Easter Egg Hunt they’d ever seen! When communities further south heard of this they asked where “theirs” was, too? The second boat, the *Traci C*, in Sitka gave away 17,800 “actual weight” pounds after we departed.

2010 I started hearing rumors that Sitka Tribe Board was going to try to stop our harvest. I didn’t know at the time what their motivation was, since they were the ones who had identified the “problem” of not achieving their subsistence needs in the first place, and here we were doing a really good job providing eggs to meet that demand. We again, were well prepared to harvest and had learned well the two previous years about technique and setting methods and more importantly what size of trees to look for and use for substrate. Quantity now became the main emphasis. The harvest quota for sac roe herring was up and with the rumors of efforts against our program, I decided we should bring in as much as we could. I was asked to bring in 100,000 pounds. I didn’t feel we could do it by ourselves, or that the demand was there for it, since “perceived weights” still ruled the emotional debate, but we’d try. We successfully harvested over 60,000 pounds, providing nearly 30,000 pounds for Sitka and gave it away in five consecutive days, returning nearly 1,000 pounds to the sea each night that was not taken from our deck during the day. After five days we spent a day harvesting all except three of our remaining sets and loading our fish hold with nearly another 30,000 pounds of trimmed branches, no boles, laden with eggs. We departed for Hoonah, Kake, Angoon, and added Wrangell and Ketchikan, as well. The people of Wrangell met us with traditional Tlingit welcoming song and showed their gratitude with many gifts of food in return. Various other people in all communities have shared gifts of food with us over the years as well. The gratitude for the program was at times overwhelming and the smiles on most people’s faces were easily evident.

After we left Sitka Sound in 2010 the second boat from the previous year was asked to go out and harvest our last three sets a week later, but most of them had been taken by then. Still the *Traci C* salvaged 3,000 weighed pounds and tied to the dock in Sitka and attempted to give it away on the Saturday and Sunday after we had left. They were only able to give away 300 pounds after publicizing on the local radio stations as we had the week before. Apparently, the demand had been satiated. The rest was returned to the sea to hatch.

In 2008, the first year we were asked to bring eggs to the dock, people who identified themselves as STA members brought a pickup truck to the dock and backed right up to our rail and loaded it no less than twice. They were very thankful and appreciative to have been able to receive eggs from us to distribute to elders and others and we were pleased they came and partook of the bounty. It didn’t matter to me who came and took eggs, we were providing and a need was being met. I can relate the joy, gratitude, and appreciation that our efforts have brought to hundreds of Southeast Alaskans in person. Additionally we

heard from them about the many points around Alaska and out to the lower 48 as far away as Barrow and Florida that eggs are being sent after they are picked from our deck.

In 2009, I observed Sitka Tribe to be using their own "pocket seiner" to harvest eggs for distribution to their outlets. By 2010 they had sold the boat and their ability to provide for themselves was again diminished and the use of skiffs appeared to be their preferred method of harvest. Now, some members of the Sitka Tribe are complaining that I shouldn't be harvesting eggs to give away for free to the public because I don't live in Alaska. Until 2011 Enforcement didn't consider my actions illegal, even knowing my boat is registered in Seattle and that I was not a resident. It has since come to light that many of the same STA members who are complaining about our give-away program have been selling subsistence eggs for years. It further appears that their motivation for proposing to curtail or limit the herring fishery (232), and to push the fishery further out from the city (238 & 239) are fueled by greed and emotion rather than any hard science. Their contention that the fishery is preventing them from harvesting their subsistence desires is subterfuge. We were able to meet and exceed the local need and handsomely provide to five other Southeastern communities concurrently with a healthy commercial fishery harvesting record poundage. I believe we have demonstrated that with our efforts and those of individuals going out on their own, AND the efforts of STA with their own vessels, the subsistence needs ARE or can be met coincidentally with a healthy fishery. Further, it is my belief that the **ONLY thing standing in the way of anyone's subsistence needs being met is the lack of ability to leave the dock with enough boats of adequate size and manpower to make the effort to engage in the harvest of subsistence herring eggs on branches.**

In light of the current concern about my participation in the herring eggs program during and after the Sac Roe fishery and our efforts to fulfill subsistence needs of the people, let me clarify what I hear is the main concern. I now hear the main concern is that I am a non-resident. To the majority (**but not all of**) 2009-2011 Sitka Tribe Board this is the issue. I have received support from many member of Sitka Tribe as well as residents of the outlying communities we also provided eggs to. To the people who benefited from our program and are not Board members, most of them cared more that I was providing a valuable subsistence resource and Traditional Native food to them for free, not whether I am a resident or not. It's not that a substantial quantity of product can't be harvested, it's that a non-resident is harvesting the product. The Sitka Tribe News from Summer 2011 published an extensive letter stating their position of trying to protect a subsistence resource from non-residents. The flip side of the position is that they still argue that their needs are not being met. So my efforts to feed their people for free were harmful to the resource, but the lack of their ability to fill the need with their own people remains a problem. Pride cometh before a fall. It doesn't matter to the Petitioners that the end result is a truly positive result for hundreds of residents who cannot provide for themselves because they lack the boats, equipment, manpower, and/or time to harvest for themselves. As a non-resident, I am providing the material platforms and equipment to the program, just driving the busses. I have Alaska and Sitka residents on board during the herring fishery in which I am a small tender for the fishery and egg program, doing the actual work. When we work on the egg program I have had as many as four residents on board at one time and always no less than one full time crewman, depending the phase of the program. What has become apparent is that our program of providing for multiple communities for free distribution was cutting into the profits of some harvesters who had been selling in a "black market" and we dried up their markets. After complaining that subsistence needs were not being met, now they're complaining because subsistence needs are being exceeded for free by someone else. For these reasons I also support Proposal 273 for permitting and dockside documentation of the herring egg on branches fishery to enforce accountability and provide actual weight realism to perceived harvest needs.

As a 25-plus year participant in the Sac Roe fishery and a three year egg provider, this is the crux of the proposals, as I see it: To limit the harvest quota (232) to an "emotional-based" quota not based on science, to move fishery lines away from some areas close to town (238 & 239), and to change the method of

calculating the harvest quota relative to biomass observed by Fish and Game surveys (again 232). Emotion should not rule over science and perceived weights of subsistence needs and harvest should not carry more weight than actual weights documented (273). The sponsors of the egg on branch give-away, Southeast Herring Conservation Alliance has shared our harvest data with STA but STA, who now feign against us, has had no hard data to share with SHCA.

Sincerely,

A handwritten signature in cursive script that reads "Steven L. Demmert".

Steve Demmert
F/V *Julia Kae*

To the Board of Fisheries,

Hello , my name is Lawrence Demmert, I am a Alaska Native from Craig Ak. I own 3 Boats that fish Herring, salmon , Roe on kelp and tender herring in Sitka. I hire natives as much as I can and employ up to 20 people in a season.

I have lived in and around the Craig/Klawock area for 50 years. I have harvested eggs on branches and on kelp. Over the years I have seen a decline in the amount of people who eat and harvest subsistence. Some years there are more harvesters, but it is a slow steady decline as the elders pass on. Many young people don't eat the traditional foods and very few people go out for eggs any more in the area. I have also tendered and fished the Sitka herring fishery for over 20 years, I have seen the same decline in traditional food consumption there as in Craig/Klawock area . **I OPPOSE the proposals to shut down the core area (prop238 and 239,242) and to change the harvest rates(230,231,232) and guidelines is based purely on emotion and absolutely no science. The Herring biomass has done nothing but grow for the last ten years.** The science in the egg harvest that was done a few years ago, when the *F/V Julia K assisted in the egg harvest, weighed and distributed the eggs and then returned thousands of pounds back to the water*, to show how much was actually needed/ wanted in these years, which, by the way, was severely over- inflated by the tribe in previous years

People who say there was more herring when they were young are not remembering correctly. I am 52 years old and when I was young I traveled Se Alaska with my father wildlife was scarce, including all species of fish, which I blame on pollution and environmental poisons, and in the case of herring the reduction fishery reduced the herring population severely and the pulp mills all but finished them off. If you compare pulp mills shutting down to the abundance of herring, it goes hand and hand, everywhere, Sitka, Ketchikan and throughout British Columbia. My father, who was born in 1921, told me of the declines of the stocks, and the herring in Sitka was almost dead in the 40s and 50s, and my father in law , Rudy Johanson said there is no one alive who has seen more herring in Sitka than there currently is.

I support proposals 245,273. Allowing equal split in 1E and 1F stacking.

Equal split 233,234

I also strongly support the equal split proposals, this is a valuable management tool, it allows for a harvest spread out over a large area and not all the quota taken in a few areas, which should appease the subsistence groups, it also will stop the **illegal groups of fisherman that block and prevent other fishermen from legally pursuing the fishery!** They will also increase safety by reducing the set size so boats won't roll over, and slow the pace so there will be no need for ramming and running over nets, the Alaska law states that the State of Alaska shall conduct an orderly fishery, so the State is breaking it's own laws by letting Sitka herring be so disorderly!!

I oppose 235,236,237, they are proposed by a small group of fisherman with fast , shallow boats to get an upper hand in the fishery.

ATTN: BOF COMMENTS
Board Support Section
Alaska Department of Fish and Game
Fax 907-465-6094

From: Matt Donohoe
P.O. Box 3114
Sitka Ak. 99835
2/7/12

Prop 217

This proposal would do three things. One; create a specific allocation for each of the three commercial fisheries in the Icy Bay Subdistrict (IBS) that harvest lingcod. Two; increase the GHL for all users including sport by 20%. Three; set the allocation for longline (LL) and troll at 10% of the TAC each and the directed harvest at 46%. Sport harvest would remain at 33 and 1/3%.

I support creating a specific allocation. Because the LL season starts on March 15th and the Directed dingle bar fishery begins on May 16th there is no quota left for Trollers by July 1st when the Troll fishery begins. In the years 2000 to 2005 and including 2008 Troll harvested an average of 6,637 lbs of lingcod. The BOF created a Directed Lingcod fishery in 2003 because neither LL or Troll were harvesting their allocation. Troll harvest eventually fell to zero due to the fishery not opening before the GHL was harvested. I support an allocation for all three user groups, the question is how much per gear type.

The numbers presented by ADF&G are somewhat fuzzy because IBS is a relatively new management area. Some of the troll landings reported for IBS were actually caught in East Yakutat. Troll catch of lingcod from 2000 to 2005 is overestimated (this is stated by ADF&G). It is questionable whether trollers could harvest 10,000 lbs of lingcod bycatch a year in IBS. If the BOF increases the GHL by 20% the allocation would be 12,000 lbs. I recommend that the BOF allocate no more than 8% of the GHL to trollers, 14% to LL and 44% to the directed fishery. This seems reasonable and represents a slight reduction to LL and Directed which has to happen if trollers are to have an allocation.

Regarding a 20% increase in total GHL. I would support this if ADF&G believes it is reasonable and will not harm the resource.

Prop 218

I support 218 if ADF&G supports it.

Prop 219

I support 219 if ADF&G supports it.

Prop 221

I oppose 221. ADF&G does no lingcod stock assessments in any region in Southeast Alaska. The only way ADF&G assess stock strength is by Catch Per Unit Effort (CPUE). In the SSEOC fish buyers have been paying only \$.75 per lb for directed lingcod while in Northern Southeast the price has been \$2.35 per lb. In recent years lingcod fishing in SSEOC has been scratchy. Fishermen have not been able to pay the \$4 plus price for fuel to fish for scratchy \$.75 lingcod. Does the board of fish really want to establish a use it or loose it protocol no matter what the conditions on the ground are? If they do will it be a two way street?

Prop 312

What is the point of this Proposal? Since 1989 there has never been a year when the total projected commercial harvest of "Wild Coho" was less than 1.1 million. Why would we want to restrict manager's options? Has ADF&G not done a good job of managing our "Wild" fish? Are the Southeast Alaska Drift Gillnetters not getting their allocation? From 1989 to 2011 Drift Gillnet positive deviation from allocation has been greater than any other gear group. This proposal is divisive and pointless.

Prop 325

I support 325. Since the earliest days of Alaska hatchery enhancement of salmon, trollers have been well below their allocation. Other gear groups recognize this and that is why at the annual RPT meeting prop 325 was included in the letter of agreement. Enabling trollers to access enhanced Chum harvest is recognized amongst all commercial groups as the easiest way of eliminating or reducing a long term inequity.

Prop 326

I support 326 for the same reasons that I support Prop 325.

Steve Edenshaw
100 Andrew Hope
Sitka, Alaska 99835
Phone #907-747-2730

February 9, 2012

Dear Board of Fish Members:

I would like to introduce myself, Steve Edenshaw. I am an Alaskan native born and raised in Alaska. I am married to Anna Hill from Sitka, Alaska.

When I first came to Sitka I spent ten years as a commercial fisherman before pursuing a painting career. Two years ago I was employed with Silver Bay Seafoods in this capacity. It has been a reliable and steady source of income. Sac Roe fisheries is a major part of Silver Bay Seafoods production which allows me to be employed year round here in Sitka. During high school I worked at several canneries throughout SE Alaska and have been impressed by the high standards that Silver Bay Seafoods operates by in regards to their employees and work environment.

I would like to share that in own opinion that the sac roe fishery has been handled okay. True, like with anything else there can be off years but I have never had a time when I was not able to get my share of herring eggs. Sometimes I get them in Middle Island, north or south of town and it just depends on where you see them spawning. I get plenty enough most years to share with family and friends and they appreciate that.

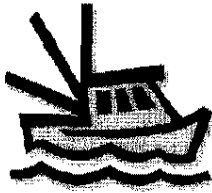
This is only my opinion but I would like to state that I feel that the commercial sac roe fishery and the subsistence herring egg fisheries have co-existed without major negative impact and can continue to do so in the future without too many changes.

In closing, if anyone has any questions I would be happy to answer any and all to the best of my ability.

With best regards,

Steve Edenshaw





F/V Ocean Gold

Ed Hansen
Phone: 907-586-6652

9369 North Douglas Hwy
Juneau, Alaska 99801

February 9, 2012

Attn: Board of Fish Comments
Boards Support Section
Alaska Dept of Fish & Game
PO Box 115526
Juneau, AK 99811

FAX: 907-465-6094

RE: Southeast Alaska Finfish Proposal Comments – Ketchikan

Dear Chairman Johnstone and Board of Fish Members,

I am a commercial, sport and personal use fisherman and an Alaskan resident since 1985. I have a home both in Juneau and in Hoonah. I have participated in almost every fishery in SE AK except the dive fisheries.

Proposal #253: SUPPORT

I submitted this proposal while participating in the spring troll fisheries to try and address an issue developing. You would see charter boats with hand troll CFEC numbers on the side of the boat fishing in areas of high king salmon abundance that was closed to commercial fishing and then later you would see them at the processors but you never saw the vessel participating in the area open to commercial trolling. It would be nice to require some visual marking that would show what fishery a vessel is participating in when they are dually licensed for charter and trolling. This circumstance should probably cover both power troll and hand troll although you see most charter vessels with HT markings.

Proposal #308: WITHDRAW

I submitted and would like to withdraw this proposal and request that the board take no action on Proposal #308 which would have allowed 6 lines in some inside waters to increase harvest of enhanced salmon. I originally submitted this proposal as a way to slow down a vessel to participate in the chum trolling fishery. I participated in the RPT Industry Consensus process and notified them of my intent to withdraw the proposal.

I do not see chum trolling as a means to get the troll fishery within their allocation range when most of the troll fishermen who use to participate in the spring king fisheries switched over to chum trolling are now leaving the more valuable king salmon that was produced for the trollers benefit unharvested and being cleaned up by the net fishery creating the same imbalance that occurred prior to the chase of chum salmon by trollers. SSRAA and NSRAA spend a significant portion of their budget raising king salmon to try and help the troll fleet.

Sincerely,

A handwritten signature in black ink, appearing to be "A. R.", followed by a long horizontal line extending to the right.

ATTN: BOF COMMENTS FAX: 907-465-6094
BOARD SUPPORT SECTION ADFG

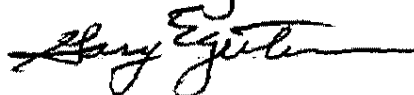
TO: BOARD OF FISH

I AM writing to oppose PROPOSAL 212:
INCREASE SPORT/CHARTER DSR ALLOCATION
FROM 16% TO 25%.

I HAVE BEEN trying to figure out why
the charter fleet feels they should be
rewarded for going over their allocation
and we (the commercial Fleet) should be
punished for staying under our allocation.
I have participated in the DSR fishery
for over 25 years. Because of the increase
of the Halibut Quota in 2-C a few years
back AND the increase of the charter DSR
catch it has been years since we have
even had a targeted fishery in CSO. If
it hadn't of been for this fishery I could
not have made my Boat or House payments.

ALFA has worked hard to help us stay under
our Bycatch Allocation of DSR in the
Halibut fishery. This year we finally get
a fishery again and the charter fleet wants
to re-allocate to them. I urge you to
SAY NO to this proposal.

F/V VALLE LEE
GARY OR MARTHA EGERTON
P.O. BOX 3094
SITKA, AK 99835

GARY EGERTON F/V VALLE
LEE


Mitch Eide
Box 981
Petersburg, Alaska
99833

Chairman Johnstone and Board of Fish Members,

My name is Mitch Eide. I am a salmon, crab, herring and longline fisherman from Petersburg and a member of the Northern Regional Aquaculture Association Board of Directors, Southeast RPT, Northern Panel of the Pacific Salmon Commission and the Board of Directors of the Southeast Seiners Association. I am writing today to urge the board to adopt proposals 227, 233, 234, 245, 273, the 2011 RPT Industry Consensus and the SEAS USAG agreement. In addition I urge the Board to reject proposals 231, 232, 234, 235, 236, 238 and 239.

Proposal 227 is clarifying equal share for the Behm Canal herring fishery is for seine only. It is forwarded by the department and deserves support.

Proposal 245 deserves support as it is the only responsible manner in which a seine fishery can be conducted in Behm Canal.

Proposal 273 deserves support primarily because it will provide more and better subsistence harvest data than is used currently and that is always the best course in resource management. This is particularly true when one user group uses the information to the detriment of another user group.

Proposal 231 would do nothing but lower the harvest of the available herring quota harming those who depend on the fishery as part of their livelihood, from permit holders to processing workers and their communities. The ADFG managers responsible for the Sitka Sound management of the fishery are professionals who do an excellent job of keeping the harvest within an exceptable range of the annual quota.

Proposal 232 to change the formula for the Sitka Sound herring annual harvest is not deserving of board support. What does it do but lower the harvest in what is arguably the best-managed herring fishery in the state and certainly among the most robust. The stock has grown by a factor of 20 since the fishery commenced in the 1970s. Why change what appears to be working so well? The proposed changes would for no biological reason reduce harvest, which again affects communities dependent on the first high volume fishery to hit the docks after a long winter.

Proposals 233 and 234 are worthy of support. These proposals would provide for elimination of the chaos in the Sitka herring fishery. There would be no more rammings, collisions, injuries and lawsuits resulting from the fishery. Additionally the subsistence issues being raised even though specious, would likely be greatly mitigated by the implementation of an equal share harvest program. Product quality

would improve. These proposals would result in a reduced share of the catch for me personally, as my production has been well above average recently (though not always). Even so the up side of less incidents, subsistence mitigation, and the probability of better product quality far outweighs any loss of harvest share.

Proposals 235, 236, 237 should have no action taken. The proposals by the Alaska Herring Seiners Association (What ever that it is? Google it and see what comes up. In thirty years of herring fishing I've never heard of them.) would not do what they claim. These proposals would result in more openings and even more opportunity for the chaos that is the Sitka Sac Roe fishery at the start of an opening. They would contribute to the collisions and law suits that seem to increasingly plague the fishery. The Petersburg Advisory committee voted not to support these proposals.

The Board should reject Proposals 238 and 239. There is opportunity for subsistence harvest in Sitka Sound every season. In years when the amount of herring eggs harvested falls short of the amount needed for subsistence (ANS) the reason cannot be laid at the feet of the commercial sector. There is not even a correlation between high commercial catch in the core area and low subsistence harvest. In only one year of the three years the ANS range has not been achieved, since 2002, was there significant commercial harvest in the core area. While in one year of low subsistence harvest there was no commercial harvest. These proposals lacks scientific or even antidotal evidence supporting the idea that closing the core area would increase subsistence harvest opportunity. Both these proposals failed to get the support of the Sitka Advisory Committee at the meeting I attended on December 6, 2011. The Petersburg AC did not support these proposals as well.

Proposals 243 and 244 to eliminate herring seining in Behm Canal are nothing more than an attempt to grab the resource from one net group to another for no reason and are undeserving of support.

At the December Joint RPT meeting seiners, gillnetters and trollers developed an agreement concerning enhanced salmon allocation in Southeast. The agreement deserves your support. Members worked cooperatively to overcome our differences and our efforts deserve adoption.

The agreement between Southeast Seiners and United Southeast Gillnetters to withdraw support from many proposals should also receive support. Again negotiation among gear groups found common ground and deserves support. The adoption of these two agreements has the added benefit of reducing the Board's workload. Thank you for your time and energy.

Sincerely,



Mitch Eide

ATTN: BOF Comments
Board Support Section ADFG
PO Box 115526
Juneau, AK 99811-5526

2/9/2012

Fax: 907 465-6094

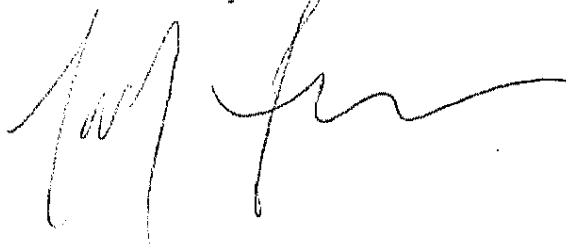
Dear Chairman Johnstone and Board Members,

Thank for this opportunity to comment. **I oppose proposal 212.** I got my start fishing in SEAK by crewing on a longliner for DSR rockfish in 1995-96, which gave me the experience to get a job longlining for halibut and on from there. These jobs are very valuable to young fisherman entering Alaska's commercial fisheries and provide employment for our communities in the winter when things tend to be a little slow in other businesses. Since then, I've halibut fished every year and have joined ALFA's Fishery Conservation Network (FCN) with like minded, conservation based commercial fisherman to live within our allocations and reduce rockfish bycatch. The FCN has worked very well for us. A similar system could easily be adapted to the commercial charter sector if they would simply step up to the plate and do it. It just takes trying.

Proposal 212 rewards exceeding an allocation at the expense of those that live within theirs and sends the signal to entry level, community based commercial fisherman that their fisheries are compromised to compensate for overfishing in another sector. In effect, proposal 212 promotes overfishing over stewardship and is an insult to the fishing industry and sound fisheries management.

Many of the proposals before you are asking for reallocations of fully utilized resources. I ask that you weigh them carefully and encourage sectors to work together to come up with solutions instead of simply asking the BOF to condone what is essentially a resource grab. Commercially caught fish are increasingly valuable to our communities; they provide jobs, support infrastructure and a tax base year round.

Sincerely, Jeff Farvour



* The 2012 commercial winter DSR fishery (DSR & Lingcod bycatch provisions combined) could well be worth over 1M in ex-vessel value alone!

This time w/ a signature!
Thanks

Regulation Proposal Form 1. Alaska Administrative Code Number: 5AAC 29.090. Book Page No.93

REC.

FEB 11 2011

2. What is the problem you would like the Board to address?

- There is a Board of Fisheries plan, 5 AAC 33.364, which allocates SE enhanced salmon. The troll allocation range is 27-32%. Trollers have harvested 19% since plan inception. Trollers are short approximately \$2.3 million per year.

3. What will happen if this problem is not solved?

In recent years trollers have been paying 35% of the SE salmon enhancement tax while only receiving 19% of the benefit. Without passage of this or similar proposals trollers will continue to be well short of their harvest share.

4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?

5AAC 29.090 (k) Notwithstanding (a) – (d) of this section the commissioner may, by emergency order, extend the length of, or set, weekly fishing periods during the spring fishery to optimize the troll harvest of hatchery chum salmon in the following areas:

(i) District 14, subdistricts, ~~114-50~~, 114-21, 114-23, 114-25

(ii) District 12, South of the latitude of Pt. Howard and North of the latitude of Hawk Pt.

~~(iii) District 9, (Within Section 9A,) South of latitude 56 degrees 21' and North of latitude 56 degrees 15.83'~~

5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?

Troll harvested June chums are usually exceptional "chrome brite" quality and individually handled with great care, live-bled, and immediately chilled.

6. Solutions to difficult problems benefit some people and hurt others:

A. Who is likely to benefit if your solution is adopted? Trollers, processors, tenders, processing workers, local communities, and consumers.

B. Who is likely to suffer if your solution is adopted?

If approved this proposal will move harvest rates toward allocation goals causing a slight reduction in net groups catch.

7. List any other solutions you considered and why you rejected them.

We developed and brought 22 ideas to improve troll harvest share of SE enhanced salmon to the December 2009 Joint Regional Planning Team. Based on feedback from other groups we honed those ideas down to less than 10 in the winter of 2010. They included ideas such as chum trolling in parts of 15 and all of 12 in June.

We thought about proposing that SE hatchery operators and Joint Regional Planning Team be directed by the BOF to prepare and submit individual and regional plans for bringing trollers within their allocation as soon as possible. In March of 2011, after hearing from numerous individuals, groups, ADF&G personnel, and our membership, we decided to submit this proposal for June and another for July.

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Chairman Johnstone and Board members,

I would like the BOF to support Proposal 325. I've been a troller since 1972. I Live in Sitka. I mainly target Kings and Coho's. W. th the increase in the chum fishery, many boats have left the Sitka Area to fish in Icy Straits in June. This gives more Opportunity to those of us chasing hatchery king salmon. Its the best of both worlds in our attempt to reach our enhanced salmon Allocation

FRED FAYETTE F/V Mirnele
PO Box 6338
Sitka, AK. 99835

Mr. Karl Johnstone, Chairman

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

Fax. (907) 465-6094

RECEIVED

FEB 06 2012

BOARDS

February 4, 2012

RE: adopt proposal 285

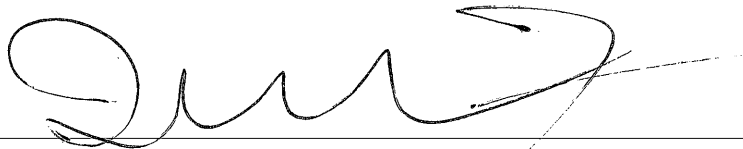
Dear Chairman and members of the Board of Fisheries,

Please repeal the 58ft restriction of length on Alaska salmon seine vessels. I was for these types of proposals three years ago and I am so today.

I have a vessel of 58ft that is over tanked because it was built before the requirement of having RSW for better salmon deliveries. It was not designed for a hatch full of water, but we are getting by. If I could add a stern extension to my vessel it would float at a safer level and running to the tender with my skiff aboard would be possible. I want to add length to my vessel because it would be less expensive than having to "sponson" it with two side extensions in width. My boat is unsafe when we are tanked and allowing me to add on to the stern would make it safer and increase the water line length for better fuel savings. Please allow me to fish a boat longer then 58ft in Alaska salmon seine fisheries.

Regards,

Jerry Freeman



PO Box 793

Newburg, OR. 97132

Attn: BOF Comments
Board Support Section
ADF&G
PO Box 115526
Juneau AK 99811-5526

Tad Fujioka
214 Shotgun Alley
Sitka AK 99835

Feb 1 2012

Chairman Johnstone:

I am a 36-year resident of Southeast Alaska. I have been fishing the waters of Juneau, then Gustavus and Sitka ever since I was old enough to hold a pole. I have been able to catch at least one sport king salmon every season for over 30 consecutive years. I have also fished commercially at times, including the last two seasons as a troller, though my perspective is still primarily informed by decades of experience as a local resident during which my fishing was limited to recreational and personal / family consumption needs. For the past 7 or 8 years I have served as the Trapping Representative on the Sitka Fish and Game Advisory Committee and have been Committee Chairman for the past three years. This experience has served to greatly expand my knowledge of other fisheries in the region and has made me a more informed citizen. When I am chairing a meeting, I attempt to refrain from giving my personal opinion as much as possible. I will not be able to attend the Ketchikan meeting in person, hence this letter is my primary means to provide you with my opinions that I intentional muted during most of the AC discussions. Please see the Sitka AC comments for our committee positions. Thank you for the opportunity to provide input in both of these formats into the decisions that you are about to make. I am quite aware of how much effort and emotion goes into this process.

For those of you without much background in Southeast, one major difference between Southeast and Southcentral has to do with the sport charter fleet and their typical clients. Unlike Southcentral, in Southeast, "while there is likely some minor use of charter fishing services by Alaskan residents... assume that nearly all charter fishing clients are non-residents" (from *Economic Impacts of the Southern Southeast Regional Aquaculture Association* October 2008 by the McDowell Group). Both the serious fishing clients who book a multi-day stay with a lodge and make fishing the primary, if not only reason for their trip to Alaska, and the casual cruise ship passenger who takes a day (or half day) charter trip while visiting a port city are important components of the Southeast charter clientele, but local residents are not.

Very few local resident anglers utilize the services of the Southeast charter fleet. This does not mean that fishing is unimportant to Southeast Alaskans, but rather the opposite. Virtually all of our communities are on the coast and have easy access to the water. Just as the original inhabitants of the area have done for thousands of years, the current residents when they want to eat or catch fish, go fishing in their own boats or their friend's boats, or are given fish by a relative or friend. Our reliance on the local fish is so high that private boat ownership makes more sense than chartering for the great majority of Southeast fishermen. Hence, rather than assisting the local residents, the charter fleet with their non-resident clientele competes with local anglers for the same water and the same quotas. Hence I strongly discourage this board from making allocations to the "sport" sector as a single entity, and instead request that the board clearly distinguish between fish intended for residents versus fish assigned to non-residents. It is unfair to local residents to have to compete against a profit-motivated industry on the water for the same fish. The competitive advantages that money provides are even more clearly seen in the environment of allocation decisions such as this BOF meeting. Please don't forget about local resident anglers who hold regular jobs and hence are unable to attend this meeting in

person, in the face of the large number of representatives from profit-oriented businesses (both charter and traditional commercial fishermen) who consider attendance at these meetings simply a tax-deductible cost of doing business.

As far as specific proposals, I **support proposals 210 and 211** to require that sport caught rockfish that are released, are done so in a manner that affords them a significant chance at survival. The Sitka AC struggled trying to get our intentions accurately and precisely reflected in our wording of proposal 211. (Some rockfish species will submerge without assistance for instance.) Many of us, including myself were not entirely satisfied with what was finally adopted, but we all believed that our concept was clear and that the board, if interested, had the superior resources to improve the language presented. Research on rockfish re-compression has only begun to be studied in the past decade or so. The results are uniformly promising to the point that it is clear that prohibiting the release of floating rockfish is fully warranted at this time.

The rockfish release requirement when applied in conjunction with **proposal 213 which I also support**, to replace the current rockfish bag limit with a point system would go a long ways towards reducing the sport-related mortality of rockfish. This would negate the any rational for increasing the sport allocation of Demersal Shelf Rockfish (DSR) as per **proposal 212 which I oppose** as unnecessary, if these other steps are taken. Before any increase in the sport allocation occurs, the sport charter fishery should first be required to reduce their DSR bycatch rates. The commercial halibut longline fishermen who participate in the Fishery Conservation Network have been able to do this quite effectively. To reallocate the DSR that the Fishery Conservation Network has been able save away from those responsible for this improvement in bycatch rates would send a terribly discouraging message to others who are potentially willing to work towards bycatch reduction. I would like to thank former BOF member Bonnie Williams for her eloquently-voiced understanding of this situation three years ago when this same proposal was previously discussed.

As opposed to such a disincentive, proposal 213, the point system bag limit, is a way of providing a positive incentive for individual anglers to reduce their take of less-desired rockfish. By offering anglers the right to retain additional rockfish of some species if they refrain from keeping other species, the fish that are harvested will end up in the coolers of those who value each species most highly. Overall the same amount of fish can provide a more highly valued opportunity to the same group of fishermen.

As a longer-term solution to much of the DSR allocation issue, I suggest that the BOF direct department staff to work with the North Pacific Council to separate the management of yelloweye from the other DSR species. Currently, most of the other DSR species are underutilized, with very limited if any directed commercial harvest. There is the potential to increase the sport harvest of these other species if the yelloweye quota could be separated out. Currently the combined DSR quota is set conservatively, assuming that the entire catch will be yelloweye, since that is theoretically possible. A separate non-yelloweye DSR quota could be established beyond the current allocations.

I **support proposal 251** to allow resident sport anglers to use two rods in salt water in order to at least partially restore their ability to compete against the profit-motivated charter fleet. Department calculations suggest that this proposal would lead to a 15% increase in resident sport harvest. While this a significant step in the right direction, even this doesn't fully balance the long-term shift towards non-residents that drove the development of the king salmon management plan back in the 1980's. (When the ratio of resident: non-resident Chinook harvest was >2:1, where as more recently the non-resident harvest has increased to the well beyond the resident's share.) For analogous reasons, I am **opposed to proposal 246** which would require that a resident sport angler using two rods release any fish that was not a king salmon. King salmon are the only state-managed saltwater species that resident sport anglers target and harvest in numbers at all significant relative to the total combined

sport and commercial harvest. As king salmon are the primary target of most of the resident effort, (aside from halibut which is federally managed) any increase in harvest of other species will be insignificant and primarily incidental.

I support a modification of proposal 250 to allow sport harvest of king salmon in freshwater, provided that all streams and rivers known to have wild king salmon runs remain as currently managed (with very few exceptions they are closed.) There are enough hatchery king salmon being released around the region that at times there are fishable numbers of stray kings in streams where they do not belong. The Department, with the full support of the Sitka AC has opened all freshwater in the immediate Sitka area to liberal sport king salmon harvest to attempt to make good use of these strays before they have a chance to establish a rogue population. Hatchery operators try to minimize the public's knowledge of straying, but it does happen. I recall seeing a dozen or so kings in a single pool in Montana Creek in Juneau in the mid 1990's. I caught and released one, just to confirm that they were indeed Chinook. I can only assume that I was seeing but a small fraction of the total number of Chinook in that system at the time and that other streams in the vicinity of the DIPAC hatchery release site and other hatchery sites had a similar number of strays. I do not support any additional harvest of wild Chinook in freshwater as these local stocks are already fully allocated.

I support a modified version of Proposal 330 establishing a closed area near the Medivje Hatchery, but oppose the proposal as written. The proposal should be modified to include a sunset date of 2014 give or take a year. The reasons that led to the EO closure of this area which NSRAA now wants to make permanent, were related to human, not fish behavior. I won't defend the abusive language or actions of certain individual hand trollers who fished that area, but I do advocate for those hand trollers who were and would still be able to fish the area responsibly. A closure of several years is a sufficient punishment for the gear group. A permanent closure unfairly punishes those without fault. Knowing that NSRAA and the department will not tolerate abusive actions in the future, ought to keep the few bad apples on good behavior and to provide an incentive for the rest of the fleet to keep those fishermen in line. While certainly the king salmon stacking up near the mouth of Medivje Creek are darker than they once were, the sooner they are harvested, the more they will be worth when sold. If the fish are not caught by commercial hand trollers they will only get darker before they are ultimately taken in cost recovery nets. I would much rather see these king salmon be caught and sold by common property trollers (whether snagged or not) than to see them as NSRAA cost recovery fish.

I support Proposal 310 to stop counting Alaska hatchery Chinook against the winter troll quota. This proposal highlights the differences within the troll fleet. The winter fishery is conducted by year-round residents. The summer fishery draws many participants from out of state. Per recent department records, approximately 10% of the winter harvest (or 4,500 of the 45,000 fish quota) has been Alaska hatchery fish. Based on historic catch rates, 4,500 fish would extend the winter quota by about a week at the end of April when the prices are \$2 or so higher than in the summer. Those same 4,500 would take the fleet less than 1/2 a day to catch in July, so the trade off in terms of time on the water is about 15:1. It is not fair that the winter season should be curtailed early in years when the Alaska hatchery programs are highly successful. I do not oppose allowing this proposal to take effect only to moderate and high abundance years, if there is a concern that the summer Chinook-retention period would be less than ten days total.

I oppose Proposal 328 to allow the use of fish traps. While I don't doubt that the proposer, NSRAA is trying to do right by fishermen, the practice described by this proposal is too dangerous to be allowed to continue. Over 50 years ago, Alaskans, in particular Alaskan fishermen, fought too hard for an outright ban on salmon traps for us to permit them to be used again, just to make things a little more convenient for a hatchery association. While at this time NSRAA only seeks to use these traps to capture fish for broodstock, it is common practice for hatcheries to sell the meat of the broodstock fish. It is a small leap from there to using the traps for cost recovery. (Particularly in a year in which

the fish captured for broodstock are more than 50% male, in which case there would be some male fish leftover which would routinely be sold without spawning them.) Once the use of traps for capturing cost-recovery fish becomes accepted practice, there would be pressure to position the traps farther and farther from the terminal area in order to catch brighter, more valuable fish.

In addition to setting a dangerous precedent, the benefits of this proposal are mostly illusionary. The fishing fleets think that they will be inherently better off if there are more common property openings. The math does support this. The number of fish captured for broodstock will not be changed by this proposal. Neither does it change the number of fish captured for cost-recovery (except to the extent -if any- that the traps can be operated more cheaply than a contract seine boat). Hence, the number of fish leftover to be caught in the common property fisheries doesn't change. The fleet will harvest the same value of fish regardless of how much time broodstock collection takes. They will simply have to work harder and forego opportunities elsewhere if there are more openings. This proposal risks much, for little if any gain in the end.

I **support Proposal 325** (as amended by the proposing organization, the Chum Trollers Association - of which I am a member, to be limited to the waters of Icy Strait and Northern Chatham Strait) which would provide the department staff with the ability to open a directed chum salmon troll fishery in June.

While the Icy Strait fishery is too far from Sitka for me to access with my small troller, I still encourage the Board of Fish to support this proposal since it will help to reduce the number of other trollers fishing near Sitka in June. As I am sure you are aware, the troll fleet is far behind our allocated share of the salmon produced by Southeast hatcheries (and has been for many years). Due to forces beyond human control, such as salmon life history, ocean conditions and global market forces, chum salmon hold the dominate share of the value of Southeast hatchery production. Increasing the amount of troll-harvested chum is the only viable means of getting the troll fleet up to their allocation. The return on investment for the hatcheries is simply so much higher for chum than for other species, that the hatcheries can not afford to produce enough king or coho for trollers to get to the 29% level without a substantial harvest of troll chum.

As the relative value of chums has increased, the number of trollers targeting them has increased every year. As the fleet gets larger, they need access to more fish-containing water in order to remain productive without crowding each other. Proposal 325 provides for this opportunity. The Hawk Inlet - Funter Bay area in Northern Chatham Strait is an area that I have sport fished for king salmon in the past. Though this was 10-20 years ago, we would typically shake off 3-10 unwanted chum salmon for every king, so I know this area is a good one for anybody who wants to catch chum in June. DIPAC chum returns are substantially higher now than they were 10-20 years ago, to the point that I have heard from sportfishermen who currently fish that area, that the chum are often so thick that it is not possible to catch a king. (Note that the sport boats targeting king salmon generally stay near the beach, while a commercial troller dragging 40 fathoms of wire is forced to fish in deeper water beyond the sport fleet. Hence, while the different gear groups may be in the same general area, they will tend to stay separated from one another, avoiding conflict.)

The chum in Icy Strait and Northern Chatham Strait are particularly bright. In the early years of the DIPAC returns, even experienced sportfishermen often confused these chrome-bright chums with coho or sockeye, as the watermarks were not even visible. This excellent condition, combined with the higher level of handling care given to troll fish have made these fish worth more per pound than the same fish caught later on in their life cycle in the terminal area gillnet fisheries. Additionally, as the fish are feeding only minimally on their migration, they lose weight enroute from Icy Strait to the terminal area fisheries. Hence, not only are the troll-caught fish in Icy Strait worth more per pound, but they are heavier on average as well.

I realize that the gillnet fishermen of the Juneau area would prefer that the Icy Strait troll chum fishery not be expanded. However, the Board should keep in mind that due to the difference in weight and price, and because a large fraction, of the troll-caught fish are actually bound for a cost-recovery fishery (and not the common-property gillnet fishery), that in 2011, the Icy Strait troll fleet earned \$2.32, for every \$1 in chum that the Juneau area gillnet fleet didn't get the chance to catch.

I also **support Proposal 326** which would allow the department to open chum trolling for up to 20 days in July in a small isolated portion on the far northern edge of area 11A (northern Juneau waters). My first salmon fishing experience was trolling with my father using an Eagle Claw rod and small Penn reel in area 11A. I was 4 or 5 years old that summer when we sold some of our catch to the fish buyer at the Tee Harbor marina where the skiff was moored. The next summer we again fished the same area and caught similar numbers of fish, but did not sell any of them. That past winter, the regulations had been changed, closing area 11A to commercial trolling. I was too young to understand about fish politics and the changes to regulations, but I did miss getting to talk with the fish buyer and seeing my father proudly lift our few fish out of the skiff and on to the dock. That was over 30 years ago, and it is time to revisit that blanket closure.

I understand that the now much-larger sport fishing population of Juneau has a need for exclusive access to the kings and cohos in the immediate area. However, the DIPAC hatchery produces primarily chum, and does so in an abundance far beyond the historic population. (I recall catching just one or two chum per year, while nowadays it is common to catch 5 or 10 in an afternoon in June or July.) A troll fishery that was limited to chum and pinks, and was situated well north of Juneau, beyond the typical sport fishing areas, could occur without harm to the local sport fishermen.

While covering only a small area (smaller than the adjacent "postage stamp" that the gillnetters have designated for intensive chum harvest) and for a short duration of the season, proposal 326 has the potential to create a significant troll opportunity in the Juneau area. Juneau is unique in the Southeast region in that there is currently no nearby water available for commercial trolling in the summer. Furthermore, many of the troll permit holders that live in Juneau have full-time jobs and are only able to fish part time. Effort by these fishermen has historically been quite low due to the difficulties of accessing water that is legal and productive and still being able to be back to town in time to go to work. This proposal would provide a very useful opportunity for part-time fishermen. I understand that some full-time trollers feel that their livelihood is threatened by having to share the water with part-timers, but I do not agree with that attitude. To the contrary, I fully support this opportunity to encourage less-serious trollers by providing an area that would be the most useful to them.

The opportunity provided by proposal 326 is one that I would have been quite interested in, had it been available during the years that I attended Juneau-Douglas High School and college. Fishing fleets all over the state are aging, and the troll fleet is no exception. The chance to interest younger people in a commercial fishery that can be entered relatively inexpensively (Hand troll permits are currently available for about \$10,000 and in comparison to \$86,000 SE driftnet permits, even \$34,000 power troll permits look like a bargain.) in a location that is easily accessible to residents of the largest city in Southeast is one that the Board of Fish should pursue.

Thank you,

Tad Fujioka

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear BOF and Boards Support,

As a member of CTA and ATA, plus a life time troller since 1968, I am writing you in support of proposals #325 and 326. The participation in the inside troll chum fishery has increased dramatically in the past two years and will continue this year. The majority of the increase of fishing in the icy straits areas is in the latter two weeks of June, before the first king opener and the migration of boats to Neets Bay. I feel that an expansion of area will allow us to avoid marginal areas of potential conflict with sport and charter concerns. As quality standards improve, the quantity and value of troll caught silver bright chum demand will directly improve the individual fishermen, their communities and the state of Alaska's bottom line. The Federal government has estimated that every dollar's worth of fish landed revolves around the community six times. I personally have been spending a minimum of 75% of my gross in Alaska. These economics can only help small communities such as Hoonah and others diversify their dependence on outside sources of income. In summary, before the Icy Straits chum fishery the only option for trollers was to target king salmon. By relieving that pressure both king salmon stocks and the sport and charter fisheries should benefit. Your attention to the orderly expansion and management of the chum troll fishery is the single most beneficial action you can take for the state, the communities and the small family trollers of south east Alaska. Thank you

*Fred Leach
F/V PALA II*

Attention: Board of Fish Comments
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear members of the Alaska Department of Fish and Game Board of Fish,

Please accept the following comments for inclusion in the 2012 Board of Fish meeting book for the Ketchikan meeting.

Proposal 249

I support proposal 249 because it could provide accurate and timely account of the harvest in the guided sport fishing sector. The commercial aspect of fishing in Alaska has been regulated and monitored consistently through a variety of means, including weekly fish ticket reporting. The sports fishing industry has grown quite large, without comparable system of harvest reporting.

Coho stocks are healthy and abundant so there is currently no biological reason to establish an annual limit for non-residents, but an annual limit is still a good idea. A biological reason for this limit could present itself in the future. If abundance of the stocks goes down, good and timely data will help with management decisions.

There are social reasons to consider as well. When I go to the airport and see two people each leaving with five fifty pound boxes (150 pounds of fish a piece in 300 half pound portions) it is very apparent to me that anglers **can** have a big impact on Alaska fish stocks. The number of fish which residents witness being removed from Alaska by anglers seems excessive and it would be helpful to have a better tool to measure this harvest. It should also be possible to establish annual limits that **still** allow non-resident anglers to harvest a reasonable amount of

fish (to make it worth there trip to Alaska), but not an excess of fish which may damage the local stocks.

Every single troll caught salmon landed must be documented on a fish ticket, which is sent to ADFG within 7 days. The sports survey, which can take up to two years to glean data from, seems ineffective for counting non-resident harvests, particularly when compared with a fish-ticket system. I would like to see ADF&G's accounting of guided angler harvest switch to some kind of harvest record for all species. It seems like good management to set reasonable limits and establish a consistent harvest reporting system for the guided sport fishing sector, in order to maximize our ability to maintain and protect these fisheries for future generations.

Extending the current harvest record used for species like lingcod, steelhead, and king salmon to include other salmon species would be affordable, and it wouldn't be much to ask of sports fisherman to return those harvest records to ADF&G in a timely manner. These records would provide an accurate account of fish caught by the guided sports fleet. This kind of accounting would provide a meaningful tool which could be used in the future if the need for in-season regulation of sports harvest became necessary.

Thank you.

Martin Gowdy
F/V Charity
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98136



1517 Sawmill Creek Road
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Providing Agent Services for:



(907) 747-6625



(907) 747-6625

February 9, 2012

Via fax: attn – Shannon 907-465-6094

To: Board of Fisheries

Re: Comments on proposals to be considered at the Feb. 24 – Mar. 4, 2012 meetings

Dear Chairman Johnstone and Board of Fish Members,

Arrowhead Transfer, Inc. is a multi-modal shipping company in southeast Alaska providing full time employment for 50 people in seven different southeast communities. Please let it be known that Arrowhead Transfer **opposes** any proposal before your board that would arbitrarily reduce the ADF&G's guideline quota for the Sitka Sound sac roe herring fishery. We feel that any restrictions to the current management plan would have an adverse economic impact on our business as well as the community of Sitka. This important fishery has historically been the start of our busy season and helps us sustain year round employment numbers. We actually have to bring extra drivers on board to cover the work load. It should be obvious that many local businesses benefit from the commercial herring fishery. Sitka's economy is struggling and the freight business is at the tipping point. Every pound of freight we ship south subsidizes the rate everyone pays for their groceries and other goods coming northbound.

It is with some trepidation that we make these comments as others in Sitka have a different point of view, most notably some members of STA. While it is not our intention to polarize our friends and neighbors we feel strongly that we should make a stand for a viable commercial herring fishery because it is so important to the whole community. We feel that the ADF&G is doing a good job managing the resource and that there are plenty of fish for subsistence users.

Respectfully,

Kim Eric Hanson

Manager, Arrowhead Transfer, Inc.

100 Mount Roberts Street
Juneau, AK 99801-7700
0584
(907) 586-3980 phone
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Craig, AK 99821-0707
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(907) 826-3916 fax

Post Office Box 584
Kake, AK 99830-
(907) 785-3156
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8 February 2012

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RE: OPPOSITION to Proposal 212

To Whom It May Concern:

I am writing to state my opposition to Proposal 212 - *Increase the sport allocation of demersal shelf rockfish to 25 percent*. I have lived in Southeast Alaska for 9 years and fish for sport and subsistence. Our fisheries resource is vital to our health, quality of life, and local economy. Both the charter and commercial fisheries play important roles in sustaining our economy.

Therefore, conservative management – with the goal of long-term sustainability – of our fisheries resource should be the principle behind Board of Fish decisions. Proposal 212 does not support conservative management. If passed, Proposal 212 would reward the charter industry for exceeding their annual GHL and penalize the commercial industry for practicing careful, and self-imposed, restraint.

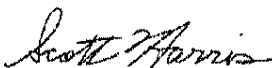
The proposal states that “DSR is an unavoidable bycatch” and that “release mortality is very high”. These statements display a gross disrespect for conserving the resource and fail to recognize that steps can be taken to minimize bycatch and mortality. Many of these steps are listed on the ADFG webpage:

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

In addition to my own fishing activities, our family pays for 1-2 charter excursions per year. In my personal experience on these trips, the charter operators made NO ATTEMPT to properly release DSR to minimize mortality. When I informed them of latest research and release methods, they stated it was impractical because they would have to stop trolling.

When the charter industry demonstrates an organized effort to support sound management and practice conservation, I believe a proposal like this may be considered. However, because that has yet to happen, the Board of Fish should not support Proposal 212.

thank you,



Scott Harris
1815 Edgecumbe Dr
Sitka, AK 99835



Mr. Karl Johnstone, Chairman
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811
TRANSMITTED VIA FACSIMILE: 907.465.6094

February 9th, 2012

Dear Mr. Johnstone:

Please accept the following comments on proposals being considered by the Alaska Board of Fisheries at the Southeast Finfish Meeting in Ketchikan from February 24th to March 4th, 2012.

I am submitting these comments on behalf of the Board of Directors and general membership of the Southeast Alaska Guides Organization (SEAGO). I, and members of the organization, will be present to speak to these comments during your deliberations.

I appreciate your time and consideration.

Sincerely,

Heath E. Hilyard, Executive Director
Southeast Alaska Guides Organization (SEAGO)

Southeast Alaska Guides Organization (SEAGO)
907.244.4909
heath@seagoalaska.org
<http://www.seagoalaska.org>

COMMENTS FROM SEAGO
2012 Southeast Finfish Proposals – Alaska Board of Fisheries
February 24th – March 4th, 2012
Ketchikan, Alaska

Proposal 210: Demersal shelf rockfish delegation of authority and provisions for management (5 AAC 47.065) – *Require release of demersal shelf rockfish at depth*
SEAGO Position: SUPPORT

Rationale/Comments: SEAGO submitted and continues to support mandating deep water release of DSR over an angler's bag, possession, or annual limit. Recent ADF&G studies show substantial survival rates of rockfish released at depth sufficient to allow recompression. We believe that the DSR resource and all saltwater anglers will benefit from this proposal being adopted.

Proposal 212: Harvest guidelines and ranges for Eastern Gulf of Alaska Area (5 AAC 28.160) – *Increase the sport allocation of demersal shelf rock fish to 25%*
SEAGO Position: SUPPORT

Rationale/Comments: SEAGO submitted this proposal to preserve angling opportunities for salmon and halibut on the entire outer coast of Southeast Alaska. The vast majority of DSR harvest and mortality is as by-catch in both the commercial longline halibut fishery and the sport halibut fishery. Without sufficient by-catch allowance, both sectors are at risk of facing area closures.

Under the current 84% commercial, 16% sport allocation, the commercial harvest has been comfortably below its fishery allocation since the allocation was set in 2006, while the sport harvest has been very near its allocation each year since 2006. The problem is that the sport bag and annual limits are as low as they can go (1 per day, 1 annual for non-residents). If the TAC decreased or effort increased, the only tool left for managers to further reduce the sport harvest is time and area closures on the outer coast. These areas would have to be closed to all sport fishing, since DSR is an unavoidable by-catch. The commercial allocation, on the other hand, is set high enough that the average annual commercial harvest is only two thirds of the allocation. This remains even with a directed DSR longline fishery on top of the by-catch in the halibut longline fishery.

It is important to note that the sport harvest of DSR has not increased. In fact it decreased from over 100 mt before the allocation was set in 2006 to 77 mt in 2006 to 51 mt in 2010 as the bag and annual limits were ratcheted down to the lowest possible levels. Unfortunately the 2010 harvest was 111% of the sport allocation.

There are two high value fisheries, longline halibut and sport halibut, which depend on adequate DSR allocation to be able to function well. The current 84/16 split leaves one fishery with a huge buffer, while the other is right on the edge of area closures. A 75/25 split would still leave the commercial longline fishery with plenty of DSR by-catch allowance, while giving the sport fishery a buffer to avoid future time and area closures. SEAGO is not seeking liberalized bag limits, and it is our hope that the sport harvest stays well below its allocation, leaving more of these valuable rockfish in the water.

Proposal 213: Harvest record required; annual limit. (5 AAC 47.024) – *Establish a point system for the retention of rockfish*

SEAGO Position: OPPOSE

Rationale/Comments: SEAGO opposes this proposal finding it to be confusing, difficult to enforce and not necessary for conservation purposes. Furthermore, the presumption used to demonstrate the necessity for this regulation is no longer valid. Charter anglers are not prohibited from catching halibut and, in fact, will be allowed to fish under a more liberalized management measure than in 2011. The Southeast charter fleet anticipates angler effort toward halibut to be commensurate with or higher than the 2011 season.

Proposal 216: General provisions for season, and bag, possession, annual, and size limits for the salt waters of the Southeast Alaska Area (5 AAC 47.020) – *Repeal the nonresident sablefish annual limit*

SEAGO Position: SUPPORT

Rationale/Comments: SEAGO supports the repeal of the non-resident annual limit on sablefish (black cod). We assert that, based on harvest numbers, it is unnecessary. This management measure was implemented based on inflated numbers of potential harvest. Furthermore, annual limits are most commonly used to control harvest to an allocation. However, since there is no allocation of sablefish for the recreational fishery and actual harvest data does not indicate overfishing, we concur that the necessity of this annual limit has not been satisfactorily demonstrated. Speaking on behalf of charter operators and guided sport anglers, we find the existing regulation to be burdensome to non-residents sport anglers and charter operators.

Proposal 221: Lingcod allocation guidelines for Eastern Gulf of Alaska Area (5 AAC 28.165) – *Increase sport allocation of lingcod in Central Southeast Outside Section and Southern Southeast Outer Coast*

SEAGO Position: SUPPORT

Rationale/Comments: SEAGO submitted this proposal to more closely align lingcod allocation with long standing harvest data in the various fisheries. Lingcod allocated to by-catch in the longline fishery in the CSEO and to the directed lingcod fishery in the SSEOC have been consistently underutilized for the past 5 years. Lingcod allocated to by-catch in the commercial jigging fishery has been almost completely unused in the CSEO and SSEOC for the past 8 years. Allocating these unused lingcod to both the sport fishery and to by-catch in the troll fishery would result in more optimal use of the resource. Trollers have been unable to keep lingcod after mid-August in 5 of the past 8 years in the SSEOC. Current guided sport regulations are a 1 lingcod per year limit with a slot limit of 30-35", or 1 over 55" (completely closed mid-season for CSEO and NSEO sections). Guided recreational anglers view this as overly restrictive.

With more restrictive sport halibut regulations, bottom fish of lower commercial value can be of great benefit to the economic viability of guided sport operators. Trollers will benefit by being able to keep and sell their lingcod by-catch through the entire summer season in the SSEOC.

Proposal 248: Special provisions for season, bag, possession, and size limits, and methods and means for the salt waters of the Southeast Alaska Area. (5 AAC 47.021) – *Change the definition for "bag limit" for anglers fishing from a vessel*

SEAGO Position: SUPPORT-(QUALIFIED)

Rationale/Comments: SEAGO generally supports a change in regulation of this nature. We argue that this change will prove less problematic for charter operators and anglers while minimizing by-catch mortality, particularly to species that are highly susceptible to death resulting from barotrauma (such as

yelloweye). We agree with the sponsor that the flexibility to retain or release fish based on a boat limit and mortal wounds, rather than based solely on individual limits, will benefit the resource.

However, we also recognize that the Alaska Department of Fish and Game (ADF&G) may need to perform analysis to reasonably project how this change may impact overall harvest rates.

Proposal 249: General provisions for season, and bag, possession, annual, and size limits for the salt waters of the Southeast Alaska Area (5 AAC 47.020 & 5 AAC 47.022) – *Establish nonresident annual limits for sockeye, coho, chum and pink salmon in the Southeast Alaska Area*

SEAGO Position: OPPOSE

Rationale/Comments: SEAGO opposes this proposal believing there to be insufficient justification. Currently, there are no conservation or allocation concerns to necessitate this proposal. We find this another attempt to set an “export limit” on non-residents sport anglers because of purported abuses by a small percentage of non-residents. We find no evidence to suggest that Alaska residents are being denied their opportunity to harvest the resource due to the current regulations regarding non-resident anglers. Furthermore, we find the characterization that non-residents do not share the value of the salmon resource with residents to be unsupported and prejudicial.

Proposal 251: Special provisions for season, bag, possession, and size limits, and methods and means for the salt waters of the Southeast Alaska Area. (5 AAC 47.021) – *Allow the use of two rods by non-guided anglers in salt water*

SEAGO Position: OPPOSE

Rationale/Comments: SEAGO believes this to be a cumbersome proposal aimed at benefitting resident anglers. We are concerned that this proposal could result in allowing non-resident anglers the use of two rods. The respective success of the guided versus non-guided angler is not determined by residency status or number of rods, but rather by the use, or lack, of professional guiding services. There is no evidence presented to suggest that there will be a measurable increase in catch by non-guided anglers if allowed the use of a second rod.

Proposal 260: Southeast Alaska King Salmon Management Plan. (5 AAC 47.055) – *Liberalize king salmon regulations in the vicinity of Ketchikan*

SEAGO Position: OPPOSE

Rationale/Comments: SEAGO asserts that this proposal does not have sufficient protections to appropriately limit harvests to mitigate conservation and allocation concerns. SEAGO is concerned because the increased bag limit does not apply against non-resident annual limits and thus has the potential to significantly increase harvest.

Proposal 261: Special provisions for season, bag, possession, and size limits, and methods and means for the salt waters of the Southeast Alaska Area. (5 AAC 47.021) – *Increase king salmon bag limits in the vicinity of Neets Bay*

SEAGO Position: SUPPORT

Rationale/Comments: SEAGO supports the increase in hatchery raised king salmon in the area described in this proposal. The Neets Bay area has a high percentage of hatchery raised king salmon. The Alaska Department of Fish and Game (ADF&G) has stated, “King fishing is also notably influenced by hatchery releases from several public and private hatcheries in the Ketchikan area. Whitman Lake, Carroll Inlet and Neets Bay hatcheries are the largest king salmon contributors in this area”.

Furthermore, SEAGO believes that the proposal's sponsor has satisfactorily addressed any potential concerns by increasing the bag limit modestly while maintaining the annual limit for non-resident anglers. We concur that this proposal will both increase sport angler access to king salmon while decreasing harvest pressure in other areas.

Proposal 269: Harvest record required; annual limit (5 AAC 47.024) – *Establish a catch report card system for subsistence, personal use and sport finfish fisheries*

SEAGO Position: OPPOSE

Rationale/Comments: SEAGO opposes this proposal believing that it will not measurably improve the quality of the data collected, which is currently collected through multiple means (charter logbooks, CREEL census, and mail-in surveys). This proposal will create an additional data collection method with additional complications and additional funding requirements that we believe will not ultimately substantively improve resource conservation.

Proposal 270: Subsistence fishing permits; and Personal use bottomfish fishery (5 AAC 01.730 & 5 AAC 77.674) – *Require a permit for subsistence or personal use harvest of sablefish*

SEAGO Position: SUPPORT

Rationale/Comments: SEAGO concurs with the submitter that this proposal will improve data collection methods for subsistence and personal use sablefish harvests. The regulation change will allow the department to collect additional data, and thus improve management of the resources while minimizing complications to the harvesters associated with the permit application and data reporting processes.

Proposal 294: Retention of fish taken in a commercial fishery (5 AAC 39.010) – *Require reporting of commercially caught salmon and steelhead retained for personal use*

SEAGO Position: OPPOSE

Rationale/Comments: SEAGO opposes this proposal arguing that these fish are already recorded on ADF&G fish tickets. SEAGO believes that the current fish ticket mechanism is sufficient for data collection and reporting and that this proposal could, in practice, actually lead to reduced accountability. What is needed to address the concern expressed in this proposal is additional enforcement rather than an additional data collection methodology.

Gmail - BOF finfish proposal comments.

907-465-0077

Page 1 of 1



stephen hoffman <margcs123@gmail.com>

BOF finfish proposal comments.

1 message

stephen hoffman <margcs123@gmail.com>

Wed, Feb 8, 2012 at 8:36 AM

To: mcs123@gci.net

Shannon:

I would like to submit comments on two fin fish proposals that will be considered by the BOF during their Feb. 24 thru Mar.4, 2012 meeting in Ketchikan.

1. Proposal 254. This proposal would allow the use of bait by young and disabled sport fishermen while fishing in " high use" and small cutthroat lakes in SE Alaska. **I am totally against** this proposal as it would result in **high mortality** on targeted and non targeted fish species in these systems. SE Alaska already has a number of lakes where bait is allowed. In addition, a "bait window" for coho salmon is already allowed from Sept. 15 thru Nov. 15 region wide in most areas. Allowing the use of bait as proposed is not needed and would impact the conservation of cutthroat and rainbow trout throughout SE Alaska.

2. Proposal 337. This proposal would establish a new Herring Cove THA management plan for commercial, sport, and personal use fisheries that utilize this area. **I strongly support** the proposal as submitted since it would put in regulation what ADF&G has been doing by EO over the last several years. Passage of this proposal would enable the commercial, sport, and personal use fisheries to plan accordingly for their activities on annual basis without having to wait for ADF&G to issue an Emergency Order. **I would also like to support an amendment** to this proposal that would prohibit snagging by all users within the THA boundaries. My support for this amendment is based on the following factors.

A. Snagging within the THA results in damage to milling king and coho salmon that are returning to the Whitman Lake hatchery located within the THA. This results in damaged fish to be harvested by the users of this area, the presence of large weighted snagging hooks remaining in fish lost by snaggers, and negative impacts on the king and coho salmon returning to the Whitman Lake hatchery for brood stock.

B. Snagging is not the only way for sport fishers to catch the milling king and coho salmon within the THA. Besides the normal trolling methods used, vertical and horizontal jigging, using eggs or herring under bobbers, casting large spinners, and fly fishing are all effective methods to catch fish in this area,

C. The social issues associated with a "snag or meat fishery" are also associated with the need to prohibit snagging within the THA. Problems with snaggers leaving large amounts of trash, trespassing, and rowdiness are all problems related to the snag fishery in the THA.

Sincerely:

Steve Hoffman
po box 7064
ketchikan, ak. 99901

Public Comment #58



February 7, 2012

ICICLE

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

VIA FACSIMILE TO 907-465-6094

RE: Southeast Roe Herring Fisheries Proposals 232, 238 and 239

Dear Board of Fisheries Members:

Icicle Seafoods is an Alaskan corporation first started in Petersburg in 1965. We have participated in the southeast Alaska roe herring fisheries since their inception, and they are an important and integral part of our annual operations. It is for these reasons that we submit the following comments relative to the economic impact the southeast Alaska roe herring fisheries have on processors and their plants and communities in southeast Alaska.

Proposals #238 and #239 would close much of the southeast Alaska roe herring commercial fishing area, and Proposal #232 would substantially reduce the harvest rate and tonnage available for harvest even though no biological support is provided that shows a need to reduce the harvest rate. This letter will discuss some of the economic fallout that will result from these proposals, from a processing perspective, based on comparing a harvest level of 10,000 tons to the current GHL of 29,000 tons.

It goes without saying that a good part of the economic value of any commercial fishery is derived by the harvest sector. However, clearly there is additional value added to all fishery products as they are tendered, processed and shipped, and in some cases (maybe most) the post-harvest derived value well exceeds the harvest value. I believe this is the case with the southeast Alaska roe herring fishery, and that losing all or portions of the post-harvest derived value due to some of the proposed regulations will result in unnecessary economic harm to the region. Even though the fish price might vary significantly (as it has in the Sitka fishery over the last 25 years with prices as low as \$100 per ton in the early 1990s and as high as \$2000 per ton in the late 1990s), the value added post harvesting tends to be fairly stable. The following are some but certainly not all of the specific economic benefits and costs which will be impacted by a reduction in harvest, which in this case would be driven by factors other than resource biology.

1. **Tender payments.** Tenders that haul the fish from the catching point to the processing plant are paid \$125 to \$200 per ton, depending on the delivery destination. Typically, the further the distance, the higher the fee. The fee to haul to Petersburg is generally \$175 per ton. In 2011, we employed 15 tenders for this purpose; 7 were local Petersburg vessels, 5 were from other Alaskan ports (mostly Homer, Seward, and other southeast ports) and 3 were from Washington. If the proposals were to result in a total Sitka harvest of 10,000 tons, either by implementing an area closure which would limit the opportunity to harvest the GHL based on decades of sound science and fisheries management by the Alaska Department of Fish and Game (as Proposals #238 and #239 suggest), or by changing the harvest rate (Proposal #232), this would reduce the amount of tender compensation to the Icicle fleet alone by approximately \$550,000. Most of the reduced compensation would be borne by Alaska based tenders as they comprise the majority of our tender fleet. Assuming this loss of revenue was similar across the entire southeast Alaska roe herring tender fleet, the loss would be in excess of \$3,000,000. This does not account for the fuel these vessels would purchase from local southeast fuel vendors, and as their sales decline, their margins on other fuel sales must increase in order to protect their economic position.

ICICLE SEAFOODS, INC.

4019 - 21st Avenue West • Seattle, WA 98199

P.O. Box 79003 • Seattle, WA 98119 • Tel: 206-282-0988 • Fax: 206-282-7222

Alaska Department of Fish and Game
February 7, 2012
Page 2

2. **Processing labor.** The labor cost to receive and process a ton of herring from the tender at the dock to the packaged frozen fish loaded into a container or trampler vessel varies based on total volume, size of fish, consistency of delivery, and mode of shipment (trampler shipment requires more labor), etc. If the proposals were to result in a total Sitka harvest of 10,000 tons in 2012, the net loss of income to processing employees, just for the lost Icicle portion, would be \$280,000 to \$300,000 annually. Our crew for the southeast roe herring season is comprised of mostly local Petersburg workers with families and houses and local roots (we do occasionally bring in folks from other southeast Alaska towns - most recently from Kake, Sitka, and Angoon), and this work is crucial to their overall economic health and comes at a time when there is little other processing work available. I think it is fair to say that some of these folks would seek other jobs in other communities if this processing income was eliminated or greatly reduced. This in turn would impact the rest of our processing seasons and the economy for the entire City of Petersburg.

3. **Raw fish tax.** A portion of the Alaska Fisheries Business Tax that Icicle pays to the State is returned to the local community. As a shorebased processor, we pay a 3% tax on the total fish price for all fish products processed in Petersburg. Since Petersburg is not located in an organized borough, 50% of this amount is returned to the City of Petersburg. A.S. 43.75.130(a)(1).

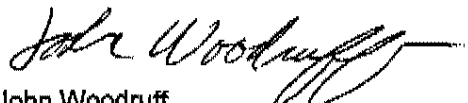
4. **Plant overhead operating costs.** Very simply, the more pounds we run through our plant, the less our overhead cost is on a per pound basis. Any reduction in volume that we face in one fishery will be made up either by increased per unit costs in other fisheries, a reduction of expenses (this usually means fewer people since that's our biggest overhead cost), less margin on all other products, or a combination of all of these. However, as processing plants lose their base (the pounds they process), they become less and less economically viable. There are certainly examples of plants in the recent past that have stopped operating because their source of products diminished. Some of these are in communities with little other economic base. A reduction to 10,000 tons of herring would impact our Petersburg plant in that there would be approximately \$350,000 in overhead costs that would have to be allocated to other products. This might not be an issue in an overall good volume year, but will cause issues in years in which we have poor volumes in other fisheries. A reduction like this probably doesn't cause our Petersburg plant to cease operating, but these types of reductions based on something other than sound science certainly make the landscape more difficult.

5. **Shipment of products.** We ship our frozen fish mostly by container, although depending on the year and the market, trampler shipments are possible. The cost of shipping is significant but the key issue for southeast Alaska is the impact a significant reduction would have on the local shippers (Alaska Marine Lines), their loss in revenue, and how they would "make up" for this - likely in increased costs for other shippers. This impacts everyone in southeast.

We appreciate the opportunity to outline our concerns about these proposals. I plan to be at the Board meeting in Ketchikan and will certainly be available to answer any questions you might have.

Sincerely,

ICICLE SEAFOODS, INC.



John Woodruff
Vice President of Operations



Dear Chairman Johnstone and Board of Fish members,

My name is Randy Lantiegne I am currently the southeast fleet manager for Icicle Seafoods in Petersburg Alaska. I have personally participated in the Sitka Sound sac roe fishery as a fishing boat deckhand, tender crewman, tender captain and now working in the processing industry. Having taken part in this fishery from four different perspectives it has given me a greater understanding of just how much this fishery means in its current management form to the economy all across Alaska.

I would like to voice opposition to the following three proposals, which would significantly change how the Sitka Sound sac roe fishery is managed by the Alaska Department of Fish and Game and certainly impede the commercial fishing fleet in harvesting the established herring quota. :

PROPOSAL 238: Establish closed waters for the Sitka Sound commercial herring fishery in order to provide an area only open for subsistence.

PROPOSAL 239: Exclude commercial herring fishing within a defined core spawning area within Sitka Sound to allow for a harvest of herring spawn to meet the amount reasonably necessary for subsistence.

PROPOSAL 232: Would reduce the harvest rate and tonnage available for harvest, with no biological support.

The proposals 238+239 mentioned above would have a direct impact on the operations at our Petersburg Plant by bringing uncertainty to whether there will be opportunity to harvest the herring quota. I have been involved in the fishery for many years and know that there are years when a large majority of the biomass stages in this area. Not having access to this area would bring great uncertainty to expected harvest levels making it difficult for Icicle to budget and plan for the fishery. We could not be certain on how many tenders to hire, the number of employees needed at the plant, how much packaging to have on hand and many other factors that a solid harvest opportunity provides us with. The economic viability of our company's participation in the fishery would be significantly compromised.

Proposal 232 provides no biological support that such a harvest rate which would significantly reduce the tonnage available for the commercial harvest. The Alaska Department of fish and Game has managed the Sitka Sound sac roe fishery with sound science and biological data to ensure that all user groups of this healthy resource will be able to utilize it now and in the future.

The subsistence harvest of roe on branches is an important part of the Sitka Sound sac roe season, and in no way do I want to downplay the importance of that. I simply feel that having an area closure will take much of the certainty out of our business plan for the Sitka Sound sac roe fishery and still not have the desired effect in the subsistence harvest.

PETERSBURG FISHERIES
A DIVISION OF ICICLE SEAFOODS, INC.

P.O. Box 1147 • Petersburg, AK 99833 • Tel: 907-772-4294 • Fax: 907-772-4472



Thank you for the opportunity to provide you with comments on proposals #238, #239 and #232.

Sincerely,

Randy Lantagne
Southeast Fleet Manager
Petersburg Fisheries

PETERSBURG FISHERIES

A DIVISION OF ICICLE SEAFOODS, INC.

P.O. Box 1147 • Petersburg, AK 99833 • Tel: 907-772-4294 • Fax: 907-772-4472



P.O. Box 419, Yakutat, Alaska 99689 Phone: (907) 784-3392 Fax: (907) 784-3686

ATTN: BOF Comments
Board Support Section ADFG
PO Box 115526
Juneau, AK 99811-5526

FAX: 907-465-5526

Dear Chairman Johnstone and Board Members,

Subject: Oppose 301,302 and 303

I started coming to Yakutat in 1988 and have lived in Yakutat full time(since 1997) or at least 7 months a year(since 1988). I started Yakutat Seafoods in 2005 and I have been the processor buying on the beach since 2005 that is mentioned in the above listed proposals. To give some background on the "Tsiu River Coalition", there are no members of the community of Yakutat who are part of the Coalition nor are any of the lodges at the Tsiu River members except Alaska Wilderness employees. I feel that it is important to know who the Tsiu River Coalition is when one looks at three above mentioned proposals.

Some background to consider with all 3 of these proposals:

1. Commercial fishing has been going on at the Tsiu River since 1932
2. Escapement goals have been met every year.
3. City and Borough of Yakutat tax revenue received from Commercial Fishing at the Tsiu River in 2010 was \$17,500(\$10,500 raw fish tax and \$7000 wharfage. Wages paid in 2010 for processing Tsiu River catch was \$55,000. Airfreight paid Alaska Airlines for flying Tsiu River coho's into the fresh market was \$525,000. Fuel purchased for flying the Tsiu River coho off of the beach to Yakutat was \$110,000. Earning received by the commercial fisherman was \$400,000. My point is that there is a tremendous amount of economic activity associated with the commercial fleets catch also. This list can go on and on.
4. To classify long term residents of Yakutat as "squatters" or "squatting" is unacceptable. Many of the cabins that commercial fisherman are staying in have been passed down from family members who also fished the Tsiu River. To dehumanize individuals because they cannot afford to pay up to \$600 per night to stay at a lodge is deplorable.
5. City and Borough tax revenue received from the sport lodges for 2010 was \$82,000(\$50,000 bed tax and \$32,000 lease)
6. The average number of commercial fishing openers(24 hour periods) over the last 10 years is 10. The 24 hour commercial fishing period has been shortened when catch exceeds hauling capacity. Average days that sport fishing goes on at the Tsiu River is 45

days(August 15 to September 30) During the closures of commercial fishing the sport fishery has 100% of the Tsiu River 100% of the time.

7. The Tsiu River accounts for up to 25% of the total fish purchased by Yakutat Seafoods. We are Yakutat's largest employee with a crew of up to 70 with a season that starts mid March and continue to mid October with a small full time winter crew operating too.
8. The classification of quality of the Tsiu River coho as poor is erroneous. They are sold into the fresh market to Whole Foods Markets thru out the United States. In 2010 Yakutat Seafoods shipped over 2 million pounds of seafood fresh on Alaska Airlines and 75% of the Tsiu River coho were shipped fresh. In 2010 we flew over 400,000 pounds of ice to the Tsiu River to maintain the quality of the fish.

Oppose 301

We oppose this proposal. The Tsiu River is a ever changing river, some years the mouth breaks out to the West creating a shorter river and other years it breaks out towards the east and creates a longer river. The Alaska Department of Fish and Game uses the traditional markers and if needed based on water levels may move the markers as in 2010. Traditionally commercial fisherman have fished the mouth of the Tsiu and sometimes into the breakers. To change this marker because that is the "greatest sport fish opportunity" and because it is "the most prized destination on earth for lots of people" is irresponsible. The sport fishery already has the entire river almost 80% of the time. We feel that the existing marker regulations provide both groups the best method to coexist. We recognize that the Alaska Department of Fish and Game "may" move the Commercial markers to respond to challenges that nature may create to guarantee escapement levels. The jest of this proposal is that the Commercial Fisherman who have been harvesting the Tsiu River for the last 80 years are messing up the aesthetics of the Sport Fishermans experience with a long list of complaints. The commercial fleet has no problem coexisting with the sport fisherman, we recognize their right to go sport fishing and for Lodges to continue their business at the Tsiu River. We feel it is inappropriate for the Board of Fish to move the commercial markers to restrict the commercial fisherman and to increase the "aesthetic" value of another group.

Oppose 302

We oppose this proposal. In the Yakutat District it is legal to use jet boats to herd salmon. This takes place on several rivers including the Tsiu River. This is the most efficient way of harvesting salmon. If proposal 302 were to pass the catch of the commercial fleet per opener would be less because of being forced to use inefficient methods which would lead to more openers based on over escapement which would lead to more commercial fishing time which leads to more conflict. We feel the current regulations work.

Oppose 303

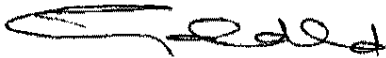
We oppose this proposal. Once again we point out that the escapement goals for the Tsiu River have been meet each year. The escapement goal is 10,000 to 29,000 fish. Coho returns are basically males arriving first and once the male/female ration is 50/50 the peak of the run has arrived. Under this scenario we would harvest a larger number of females based on several 3 openers a week versus two openers a week because the bottom end of the escapement goal has been met. I do not think it is in any of our interest to target the females of a run. I think that the

long term success of management on the Tsiu River shown by the Alaska Department of Fish and Game speaks of our opposition to this proposal.

In summary I find it disturbing that the jest of all three of these proposals is to cast commercial fishermen as people who care very little for the resource, that the people associated with commercial fishing on the Tsiu River to include fisherman, processors, pilots and Alaska Department of Fish and Game employees are of low character and not to be trusted and that the fisherman and processor has little or no regard for the quality of the fish harvested at the Tsiu River disturbing. The baseline of all three of these proposals is that the "experience" for the client of the Tsiu River lodges is being tainted by the people who make a living commercial fishing and that because in their opinion it is a world class fishing experience that they should not have to be bothered by local residents who have traditionally fished this river for generation after generation. I find this deplorable as I hope you do too.

Thank you for your service.

Sincerely,



Greg Indreland
Managing Owner
Yakutat Seafoods
Full time resident of Yakutat

Board Support Section, ADFG
PO Box 115526
Juneau, AK 99811-5526

February 8, 2012

Re: Strongly Oppose proposals 216 and 212

Dear Chairman Johnstone and Members of the Board,

I have lived in Sitka since 1991, and before that in Port Alexander and Petersburg since 1974. My wife and I own the 66' Kariel, and have made a living as longliners since 1975, starting with a 30' gas powered plywood boat.

I strongly oppose proposal 216, boldly asking the board to remove the generous annual limit of 8 sablefish in the northern southeast inside (NSEI) sablefish area for non-resident anglers. According to Fish and Game's own scientists, the biomass in the NSEI has been in decline since 2002 and the board itself wisely adopted the 8 fish annual bag limit in the last cycle. With a decent size average for sablefish the annual limit would allow for more than a 50# box of finished product to be taken home by each angler. And there are other popular sport fish available as well, to make anglers' cars stern heavy when they get home. The catch limit for commercial sablefish has been in decline for years, and is now less than half of what it was 10 years ago. It is irresponsible and unreasonable to ask for an increased allocation for the newest users of the resource when the longliners continue to bear the brunt of conservation measures to assure the viability of the resource, struggling under falling quotas.

I also oppose proposal 212 which is a blatant resource grab, seeking to reallocate rockfish from the commercial halibut fleet, which has been keeping within its bycatch limits, and give that rockfish to the commercial charter industry, which has not stayed within its allocation, and has made no effort to stay within its allocation.

I am a member and participant in the Fisheries Conservation Network, a project initiated by the Alaska Longline Fishermen's Association seeking to create tools and build cooperation to help us control our bycatch of rockfish in the halibut and sablefish fisheries. It is innovative and forward thinking and has been responsible for a decrease in rockfish bycatch rates.

As you would know, our halibut catch limit in area 2C is less than 25% of what it was 7 years ago. With that decline in halibut target, there has been a corresponding decline in our rockfish bycatch. So now the charter industry wants to take that "saved" rockfish away so that when the halibut biomass trends back up, we who seek to control our bycatch would not have the rockfish necessary to fish the larger halibut catch limits. And the directed longline rockfish fishery, which is small enough, and one of few opportunities for small local longliners to pay some bills in the winter time, would be sacrificed for the uncontrolled appetites and lack of conservation initiative of the charter fleet. What's right about that?

Taking a fully subscribed fish resource from a responsible user group and reallocating it to a newer commercial industry with no initiative to live within its means does not sound like what this board of fish is about. Please show us why fisheries management in Alaska is showcased in other parts of the world, and why we have faith in the board of fish process.

Thank You for your Service here.

Steve Fish and Kari Johnson
P.O. Box 6448
Sitka, Alaska 99835

Kari Johnson
2 PNT

BOF COMMENTS

1 KMJones,

Kenneth M. Jones
PO Box 1044
Homer, AK 99603
907.235.6417
ken_jonz@hotmail.com

ATTN: BOF COMMENTS
Boards Support Section
Alaska Dept. of Fish & Game
PO Box 115526
Juneau, AK 99811

via fax: 907.465.6094

I support proposals #236, #237 & #273.

I am opposed to proposals #230, #231, #232, #235, #238, #239, & #240.

Opening Statement: Most of these proposals seek to curtail and restrict the Sitka commercial salmon fishery. This looks to me like a solution looking for a problem.

The Sitka herring stocks are healthy and the biomass is increasing. ADF&G has managed the resource and the fishery in an exemplary manner. The biomass has increased from 7,500 tons in the mid 1970s to almost 150,000 tons today, a twenty fold increase. Hump back whales used to appear for a few days now have a year round presence. ADF&G has a sophisticated model and that is supported by extensive field work, including divers who count deposited eggs. Today's large quotas are only possible because there are proportionally large amounts of eggs in the sound after the commercial harvest.

Oppose #230: Add to the management criteria.

The three components proposed are already included in the management plan

Oppose #231: Shut down the fishery if the catch is within 10% of the quota.

The average catch for the past decade is 2% less than the GHL. ADF&G has shown the ability to reliably restrict the catch to the quota.

Oppose 232: Change the Sitka harvest formula from $2 + 8 (\text{biomass}/25,000)$ to $8 + 2 (\text{biomass}/25,000)$ to conform with other SE stocks.

Other stocks in SE are much smaller than the Sitka Sound biomass and need to be managed differently. The growth of Sitka stocks while using $(2 + 8)$ speaks to its success.

Oppose #238 & #239: Restrict the commercial harvest from Signal Island to Harbor Pt.

BOF COMMENTS

2 KMJones,

There are now areas that ADF&G reserves for subsistence. While I support subsistence needs, until there is solid data on the take of branches (proposed #273) it is impossible to make an informed management decision.

Oppose #240: Dedicate 5% of the quota to the bait fishery.

The sac-roe fishery has traditionally produced the highest value to the fisherman. Hopefully this will continue, and I oppose giving up quota to another fishery at this time.

Support #236 & #237: Modify seines to 1025 meshes deep and 150 fathoms long.

Large quotas in Sitka won't go on forever. At some time the department will want to slow the CPUE & be able to have openings without fear of over shooting smaller quotas.

Support #273: Establish a method to quantify the subsistence harvest.

There should be no harm from having solid numbers. What can be the rational for not producing accurate data to support the subsistence harvest?

Industry Consensus 12/8/11

The troll fleet continues to be below its target range; the seine fleet is below its target range; the gillnet fleet above its target range, based on the five year rolling averages calculated and finalized by ADF&G for the seasons up to and including 2009. Although the numbers for 2010 are preliminary and for 2011 very preliminary, it appears there has been movement in the right direction for the troll fleet, probably caused by their additional chum harvests outside of Neets Bay and at Homeshore; and for the seine fleet the movement has been in the wrong direction, probably largely explained by poor survivals at Hidden Falls and Deep Inlet and good survivals at DIPAC facilities.

In recognition of the imbalance and the long-term trends in the distribution of enhanced fish the JRPT recommends to the Board of Fisheries and to the commissioner:

Supporting the USAG and SEAS agreement (signed copy attached) regarding the following board of Fish proposals related to enhanced salmon allocation plan as follows:

- Proposal #295 (modify gillnet fishing in Zimovia Strait) JRPT recommends no action as proposal is being withdrawn.
- Proposal #323 (remove PNP's production from allocation plan) JRPT recommends no action as proposal is being withdrawn.
- Proposal #324 (create separate allocation plans for southern and northern southeast Alaska) JRPT recommends no action as the proposal is being withdrawn.
- Proposal #331. The JRPT is not in unanimous support of the proposal as written. But, the JRPT unanimously supports modification of Neets Bay SHA management as follows: If #331 is not adopted the associations (SEAS & USAG) will jointly request a modification to the current Neets Bay regulation 5AAC 33.370(b) 2 (A) which would delete [THE FIRST OPENING MUST BE FOR GILLNETS]; and ask the JRPT to support this modification, and, if this proposed modification is adopted, recommending to SSRAA that during any late summer or fall net rotation the net fleet below its range would have first start. If #331 is adopted SEAS and USAG will recommend to the SSRAA board continuing the current opening time ratios and rotations in the chinook and early summer chum portions of Neets Bay management and adding at least one more rotation; and continuing the 1-to-1 ratio in any late summer and fall net rotations with the net fleet below its range having first start.
- Proposal #332 (ties Neets Bay opportunities to status of allocation plan) JRPT recommends no action as proposal is being withdrawn.
- Proposal #334 (continue 1-to 1-ratios at Anita Bay) The JRPT recommends support of their proposal with changing the sunset date to 2014 instead of 2017.

- Proposal #335 (continue 1-to 1-ratios at Deep Inlet) The JRPT recommends support of their proposal with changing the sunset date to 2014 instead of 2017.
- Proposal #336 (reestablish rotational fisheries at Nakat) The JRPT recommends no action as proposal is being withdrawn.

In addition the JRPT recommends to the Commissioner:

- Supporting SSRAA's efforts to increase commercial fishing opportunities on salmon released at Neets Bay.

In addition the JRPT makes recommendations on the following Board of Fisheries proposals that affect the Southeast Enhanced Salmon Allocation Plan:

- Proposal #315 (extend coho season to 9/30 in Behm Canal) The JRPT supports extending the coho season to Sept 30th in a portion of Behm Canal to allow additional opportunity on returning enhanced coho to SSRAA.
- Proposal #344 (changing lines at Deep Inlet in May and June). The JRPT recommends support as it would increase troll opportunities on Chinook.
- Proposal #340 (changing lines at Anita Bay) JRPT recommends support of this proposal. This should improve the quality of enhanced salmon harvested at Anita Bay with minimal impact on salmon enhanced allocation plan.
- Proposal #308 (allow six trolling line in inside waters) Consensus that no action should be taken on this proposal for six troll lines as the proposer is withdrawing the proposal.
- Proposal #311 (troll coho retention to June 1 from June 15) JRPT recommends support of coho retention by the troll fleet starting June 1.
- Proposal #325 (chum hatchery access to trolling in June in sub-districts of districts 9, 12, and 14) The JRPT conditionally supports the proposal with the following recommendations: that section (iii) District 9 and sub-district 114-50 is withdrawn from the proposal, and that the proposal sunsets in 3 years; and that a chum salmon management plan is developed in that three year period. It is expected that the proposed management plan is brought back to the JRPT for review and possible submittal as a BOF proposal for the next cycle. This proposal could help the troll fleet who is below their allocated range of enhanced stocks. Since this fishery would be expanding into new areas and amount of effort there are concerns about the composition of stocks that will be harvested and effects on other fisheries.
- Proposal #338 (SSRAA proposal for Kendrick Bay THA) The JRPT has consensus to support this proposal. This proposal adjusts the THA to reflect planned releases in McLean Arm.

- Proposal #343 (ADFG housekeeping proposal so that EO doesn't have to be issued every year for the coho fishery in the THA during the general season coho closure) The JRPT recommends modifications to this ADFG proposal that allows coho retention from June 1st to September 30th. The August 1st date would prevent harvest of coho in a THA that releases coho when trollers can keep coho during the general opening of the summer season. Coho have historically been able to be kept during June 15th to Aug 1st so no wild stock concerns exist.

The JRPT recognizes that it is necessary to tread carefully in making adjustments to production or to SHA management. Fisheries and community activities develop around hatchery opportunities, and future survivals and market condition are difficult to predict. At the same time, the system needs to respond to the guidelines of the allocation plan by working towards providing fair opportunities for the fleets.

The following Associations and individuals were present in the room and did not object to the following industry consensus points in this document that the RPT voted on:

Alaska Trollers Association
 Chum Trollers Association
 Southeast Alaska Seiners Association
 Southeast Alaska Fishermen's Alliance
 United Southeast Gillnetters Association

Linda Danner, Eric Jordan, Ryan Wilson, Carl Peterson, Matt Stroemer, Matt Donohoe, Tad Fujioka, Doug Rendle, Dave Otte, Alan Anderson Bill Auger, Arnold Enge, Richard Eliason, Cheyne Blough, Chris Guggenbickler, Rudy Franulovich, Ed Hansen, Kathy Hansen, Bob Thorstenson, Roger Ingman, John Peckham, Mitch Eide, Doug Chaney, Lauch Leach, Nik Nebl, Allen Jacklet, and Bruce Wallace

Letter of Agreement

United Southeast Alaska Gillnetters (USAG) and Southeast Alaska Seiners (SEAS)

December 8, 2011

In the interest of cooperation and to facilitate a productive Board of Fisheries meeting the United Southeast Alaska Gillnetters (USAG) and Southeast Seiners Association (SEAS) agree to the following;.

1. USAG agrees to withdraw BOF proposals: 289, 296, 297, 298, 323,324 and 333 previously submitted to the Alaska Board of Fisheries for the 2011/2012 cycle in Southeast Alaska
2. SEAS agrees to withdraw BOF proposals: 290, 291, 295, 332, and 336 previously submitted to the Alaska Board of Fisheries for the 2011/2012 cycle in Southeast Alaska
3. Both SEAS and USAG will ask the JRPT to amend proposals 334 (Anita Bay THA) and 335 (Deep Inlet THA) in order to change the year of sunset of the 1-to-1 ratios to 2014.
- 4) USAG and SEAS agree to support modification of Neets Bay SHA management as follows: If #331 is not adopted the associations will jointly request a modification to the current Neets Bay regulation 5AAC 33.370(b) 2 (A) which would delete [THE FIRST OPENING MUST BE FOR GILLNETS]; and ask the JRPT to support this modification, and, if this proposed modification is adopted, recommending to SSRAA that during any late summer or fall net rotation the net fleet below its range go first. If #331 is adopted SEAS and USAG will recommend to the SSRAA board continuing the current opening time ratios and rotations in the chinook and early summer chum portions of Neets Bay management and adding at least one more rotation; and continuing the 1-to-1 ratio in any late summer and fall net rotations with the net fleet below its range going first.
5. SEAS and USAG will simultaneously deliver letters to the Alaska Board of Fisheries before January 1, 2012 to provide official notification of withdrawal of the proposals indicated in paragraphs 1 and 2 above.


Bill Auger, President

USAG


Robert Thorstenson, Jr., Executive Director

SEAS

Ryan Kapp
955 Colony Ct. Bellingham, WA 98229
(360)714-0882 (360)961-6722 kappjr@comcast.net

To: Alaska Board of Fisheries
Mr. Karl Johnstone, Chair
Ms. Monica Wellard, Executive Director
PO Box 115526
Juneau, AK 99811-5526

Re: Support Information for Proposal 285

Dear Chairman Johnstone and Board Members,

I have fished salmon and herring in Alaska as well as many other species up and down the west coast for over 25 years. I would like to encourage the Board to support proposal 285. This proposal seeks to remove the current 58 foot limit on salmon seine vessels in the Southeast Alaska management area with an additional component of latent capacity reduction so the seine fleet as a whole will benefit moving forward.

Currently, the Southeast salmon seine fishery is not providing an adequate return on investment in the fishery. Even with the perceived up tick in the last couple of years the salmon seine business is not nearly where it should be as far as economic return. The industry is no longer in the financial state that it was at the beginning of the last decade but this is not to say that everything is fine the way it is. The industry is still stagnated, there has been little or no innovation in product quality since RSW, there have been very few rule changes in the prosecution of the fishery, many long time participants have left the fishery, and even though revenue appears to have come up the last couple of years it is still not keeping pace with the ever increasing expenses of operating in the fishery. There have been no vessels built solely for seining in Southeast for a very long time. New construction costs have increased so much that the salmon fishery alone does not produce enough revenue to encourage investment. Other fisheries such as long lining or emerging pot fisheries are now the driver of new vessel construction.

In the interest of improving profitability and economics of the salmon seine fishery that limitation on vessel length must be removed. Doing so would improve the pool of boats available to the fishery as now there are extremely limited options available for upgrade. Additionally, it would allow for vessels to be modified by adding length to improve the vessels safety and efficiency. Allowing longer vessels allows for new ideas and exploring areas of quality and marketing that are not possible with the current length limit. By requiring an additional permit to bring an over 58' vessel into the fishery the entire fleet, whether they choose to lengthen their vessel or not, will still benefit from an increased fishery value well into the future.

I have attached a document with information intended to support Proposal 285. As most of the Board is aware, I have been promoting this concept for some time now and have spent many long hours doing research and gathering the information presented. It will provide background on the history of the existing 58 foot regulation and the legislative steps which were taken to allow the Board to make this decision. I will demonstrate the need for this proposal, the benefits from it, and attempt to dispel some of the criticism towards it. Hopefully the Board can use this information to better address the “what ifs” as they come along during the upcoming meeting process.

The 58 foot limit was never intended to move the seine industry forward; it was intended to hold it back. It is no longer necessary in the Southeast salmon fishery. Thank you very much for your time spent considering this proposal.

Regards,

Ryan Kapp

Alaska Board of Fisheries Proposal 285 – 5AAC39.117 Vessel Length

This document has been provided to the Board in the past and has been updated to provide information to the members not on the Board during the last cycle and as a refresher to those who were.

Proposal #285 seeks to repeal the 58 foot limit for salmon seiners in Alaska. This regulation has been in effect for a long time and discussion should be promoted to determine if it still necessary in the fishery today. What was the intention when this regulation was enacted and did the regulation accomplish the intended purpose? Is the rule serving the needs of the fishery and, if not, why is it still part of Alaska's regulation? In order to answer these questions the history of the law was examined and yielded some very interesting things.

The History of Alaska's "58 foot law"

A timeline of rulemaking actions which are relevant to Proposal 285:

1924 - 1958: The White Act of 1924 gave the Secretary of Commerce the authority to fix the size and character of nets, boats, traps, or other gear... (68th Congress Sess 1. Ch. 270-272, 1924) The White Act favored the big companies' fish traps and worked against the development of small operators in Alaska. (A Brief History of Alaska Statehood (1867-1959) by: Eric Gislason) During this time period salmon fish traps were prevalent in most areas of Alaska. Most of the traps were controlled by out of state companies which had lawmakers looking out for their interests. Alaska Packers Association (APA) and Pacific American Fisheries (PAF) were the largest trap owners and influenced the lawmakers to use fishery regulations to protect their trap operations. Having a length limit on seine vessels (at this time the limit was 50 feet registered length, not overall) maintained the importance of the fish trap. Salmon seiners produced fish during this time but were not as efficient as traps and the companies did not want seine boats to become successful and diminish the production of the fish traps they controlled.

1959: Alaska Statehood. Fish traps were abolished but Alaska adopted the 50 foot measurement which was later changed to 58 feet overall length and put in statute. The length limit may have been continued to attempt to stop an influx of boats from the California sardine fishery entering the salmon fishery. This was the only way to control increased competition because limited entry was not in existence at that time.

1972 - 1974: Alaska Constitution amended to limit access to fisheries. Limited Entry Act enacted and Commercial Fisheries Entry Commission (CFEC) begins to implement limited entry program for salmon and other fisheries.

1992 – 2003: Various Panels, Task Forces, and Legislative Committees search for ways to improve the salmon industry and make various recommendations, including increasing vessel length, to both the Legislature and the Board of Fisheries.

2002: Legislature allows the holder of a salmon permit to hold an additional salmon permit for the same fishery but without additional fishing privileges.

2004: HB 409 is approved by the Legislature removing the 58 foot limit on salmon seine vessels from statute and giving the Board of Fisheries the ability to repeal the limit on an area by area basis.

2006: HB 251 is passed which states: the board may adopt, at a regularly scheduled meeting at which the board considers regulatory proposals for management of a specific salmon fishery, a regulation to allow a person who holds two entry permits for that salmon fishery an additional fishing opportunity appropriate for that particular fishery.

2008: Board of Fish excludes the bulbous bow of a seiner from the 58 foot limit.

2011: Board of Fish proposal 380 (not yet passed) seeking to define anchor rollers to prevent vessels from cutting off their bows and bolting them back on to become under 58 feet and thus legal to seine salmon.

2012: HB 261 (not yet passed) seeks to increase Alaskan ownership of Alaskan fisheries by enabling a larger number of state residents to purchase limited entry permits by allowing loans two percent below prime rate and increasing the maximum loan amount from \$100,000 to \$200,000.

Summary:

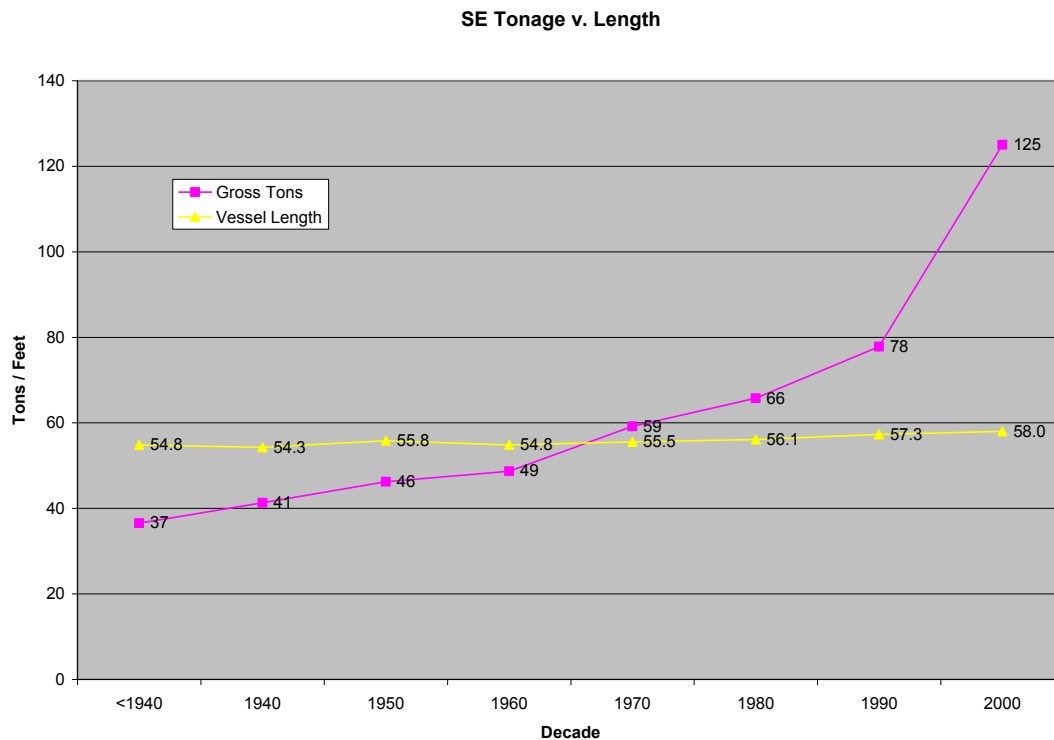
In 1924 Federal regulations led to holding the seine fleet back and maintaining the dominance of existing fish traps. Upon statehood the traps were abolished but the length limit stayed in place. Beginning in the early 1990's various panels and committees looked for ways to improve the salmon fishery. Recent Legislative actions have given the Board the ability to act on the various panel and committee recommendations. Proposal 285 uses the ideas these panels and committees recommended to help the salmon industry continue to innovate and move ahead in an increasingly competitive global marketplace.

Is the 58 foot law relevant today?

With some understanding of the history of the 58 foot limit it becomes easier to evaluate if the rule is still helpful in the present day salmon seine fishery. The original intention of the length limit was never meant to help the seine fleet but was an effective attempt to hinder its growth. True, it was kept at statehood as an attempt to limit an excessive number of boats from entering the fishery but with the advent of limited entry the issue of excessive new entrants has largely been dealt with. The amount of access to Alaska's salmon fisheries are now controlled by the amount of permits available. Clearly, a rule limiting length on salmon seine vessels in Southeast Alaska is no longer relevant.

The 58 foot law did not limit fleet capacity.

The original intent of the 58 foot limit was to constrain the capacity of the seine fleet. Many years have passed and it can now be seen that limiting length alone did not ultimately constrict or limit fishery capacity. The salmon seine vessel has been held to 58 feet but the vessels have grown considerably in both width and depth. Today's vessels are being constructed with widths of 25-28ft and depths of 11-13ft. This is a far cry from the vessels of fifty years ago and it must have been unforeseen at the time. The chart below demonstrates the change in seine vessels over time:



The above chart shows average vessel tonnage and length in the decade that vessel was built in. The average tonnage of a vessel built before the 1960's was about 45 tons and the average tonnage of a vessel built in the last decade was 125 tons or approximately 3 times the tonnage of a boat built 50 or more years ago. The design of a 58 foot seine vessel has definitely changed over time because of the length limitation. If the limitation did not exist, or was removed after limited entry, it could be argued that today's salmon seiner would be longer instead of wider using more traditional length to width ratios. The following pages demonstrate the changes of 58 foot seine vessels and also include some vessels over 58 feet for comparison:

The following vessel comparisons are done using the simplified method for calculating capacity: Length x Width x Depth x .0067 = Vessel Tonnage.



Vessel built: Pre - 1940
 $58 \times 14.5 \times 6.4 = 5382$
 $5382 \times 0.0067 = 36$

36 tons

Vessel Built 1966
 $58 \times 17 \times 7.5 = 7395$
 $7395 \times 0.0067 = 50$

50 tons



Vessel Built 1979
 $58 \times 19 \times 9 = 9918$
 $9918 \times 0.0067 = 66$

66 tons

Vessel Built 1981
 $58 \times 22 \times 10.5 = 13398$
 $13398 \times 0.0067 = 90$

90 tons





Vessel Built 2008
 $58 \times 25 \times 12.5 = 18125$
 $18125 \times 0.0067 = 121$

← 121 tons

Vessel Built 1981
 $65 \times 22 \times 10.5 = 15015$
 $15015 \times 0.0067 = 101$

101 tons →



Vessel Built 1989
 $73 \times 23 \times 9.8 = 16454$
 $16454 \times 0.0067 = 110$

← 110 tons

Vessel Built 1976 / 1989
 $65 \times 21.5 \times 8.9 = 12438$
 $12438 \times 0.0067 = 83$

83 tons →



After looking at the previous examples it becomes apparent limiting length alone does not control fleet capacity. Below is a selection from a fishing publication article referring to a recently built 58 foot vessel:

..."We built her as big as we could. **We built an 85-footer that's only 58 feet long,**" he says.

Still, she's a small boat, and to help dampen the pitching and rolling motion, there's a bulbous bow and rolling chocks.

... It wasn't easy working up the lines for a boat that deep and wide without ending up with something that looks like a shoebox. ... "It was tricky getting a 26-foot beam into a boat and make it look like something."

Working within the constraints of a 58-foot overall length... "you end up standing the bow stem almost vertical," and it's hard to bring the stern in at all...

Not being able to lean the bow out to accommodate a goodly amount of flair or taper in the hull lines leading back to the transom means **you are not going to have as shapely a hull form as you would for a longer boat, a hull that would track much easier through the water.**

However... "That's the nature of a super wide boat." (Vessel names and Sources of quotes have been removed. Bold type added for emphasis)

The few 58 foot vessels constructed today now have greater capacities than many vessels longer than 58 feet but are less efficient moving through the water. Is there still a need for a 58 foot limit on salmon seine vessels? Vessels have been allowed to get wider and deeper but not longer. Why? Hull efficiency is an important thing today because fuel prices are soaring and adding width, even with a bulbous bow, is not as efficient as adding length to a vessel. The following are facts of design from the Navy concerning hull efficiencies and length to width ratios:

2.1 Displacement Ships

2.1.1 Hydrostatic Displacement: Ships

2.1.1.1 Historical Origin

It is impossible and unnecessary to present here a history of the development of the displacement hull form. Let it suffice to point out that this hull concept dates to prehistoric times.

2.1.1.2 Dominant Physics

The lift/drag performance of displacement ships at high speeds is dominated by wave making drag. A displacement form moving through the water pushes the water aside as it moves. This disturbance of the water requires energy, specifically propulsive energy from the ship.

Two major parameters affect the wavemaking resistance of the ship: Speed and Slenderness. Ship wavemaking drag increases rapidly with increasing speed. It is not possible to state a specific law for this increase - a law that holds true for all ships - but it is common to refer to a cubic increase in drag with speed. Specifically, it is commonly understood that ship propulsive power will increase as the cube of ship speed. Thus a doubling of ship speed will require an octupling ($2^3=8$) of installed power.

¹ Transport Factor is a measure of merit developed by Dr. Colen G. Kennell of the David Taylor Model basin. Dr. Kennell's paper "Design Trends in High Speed Transport" was distributed to workshop attendees. Transport Factor is defined as:

$$TF = 1.6878 / 550 * 2240 * (\text{Full Load Displ. in Long Tons}) * (\text{Speed in knots}) / (\text{Total Installed SHP})$$

This cubic relationship is close to true for "normal" speeds. But at very high displacement speeds the curve becomes even more steep. It is common for naval architects to limit their investigation of displacement ships to a speed length ratio of about 1.30. (Speed length ratio is the ratio of ship speed in knots divided by the square root of the ship's length in feet. This is also known as the Taylor quotient T_q , after ADM David W. Taylor.) Above a speed-length ratio of 1.3 the increase in drag with increasing speed becomes greater-than-cubic.

Speeds greater than 1.3 are present in some displacement hull designs. The dominant question is “how important is wavemaking?” for the particular design. If one can make the wavemaking problem of lesser importance overall, then one may more readily consider speeds higher than $T_q=1.3$. The tool (or “one tool”) for this is ship slenderness. A slender ship disturbs the water less, and thus has less wavemaking drag. It also has more surface area and thus more frictional drag, but this does not suffer the same steep growth with speed as does the wavemaking drag. Slenderness is measured as the Length over Displacement ratio ($L/\nabla^{1/3}$).

Is the 58 foot limit still important in today’s fishery? It forces boats to be modified or constructed in a way which makes them less efficient than allowing boats with more conventional length to width ratios. The inefficiencies of a wider hull design were recognized by the Board in allowing bulbous bows to extend beyond the 58 foot limit to try and gain efficiency. This was a good thing but, under that same premise, why not remove the limit entirely and open up even more options for fishermen to gain efficiencies in their business?

EVOLUTION OF SEINE VESSEL CONSTRUCTION AND DESIGN



Old Seiner Built 1914



Seiners built with a "traditional" house.

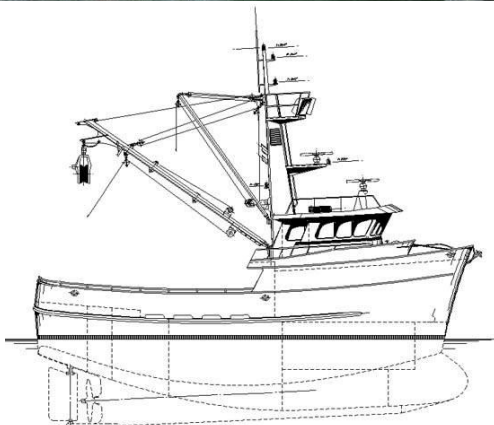
In the early years most seiners were of wooden construction and built to a length of 58 feet because a rule put in place many years ago said they had to be. There were a few longer boats "grandfathered" in but not really that many. As time went on the boats changed.

58 foot boats made of wood that were originally built to be 14 or 15 feet wide in time became 16 or 17 feet wide. Fiberglass and steel construction with widths of 19-22 feet came next and most recently 24 to 26 feet. All the while there were lots of boats built less than the 58 foot limit.

Boat designers began to use a "raised fo'c'sle" design. This increased length to the deck space without sacrificing accommodation space. More recently, as an alternative to the large expense of new construction, vessels that were built at, for example, 18 feet of width are now being widened.



Seiners smaller than 58 feet



Why, after all of this transition and change took place, is a limit on vessel length still necessary? Clearly the limit was never about vessel capacity because nothing kept boats from becoming wider and deeper. The limit on length should have been done away with long ago. When the law was first written did the authors realize what these vessels would morph into?

- The new wide designs are a more inefficient than longer boats which is why most add a bulbous bow. Why not build longer?
- If a "raised fo'c'sle" design was created due to a need for additional deck space. Why not build longer?
- Boats were allowed without limitation to be wider and deeper. Why not build longer?

The 58' limit on salmon seiners related to length limits in other fisheries.

Many seiners in Southeast Alaska also participate in fisheries other than seining. As a matter of fact, according to CFEC data, around half of the SE seine fleet also participates in other fisheries during the year. The long legacy of the 58 foot limit for salmon seining has influenced regulation in these other fisheries. The state has incorporated 58 and 60 foot vessel length limits into fisheries all around the state such as:

- Sablefish in Prince William Sound
- Cod fisheries in Cook Inlet, Kodiak, Chignik, South Alaska Peninsula, Aleutian Islands, and Bering Sea.
- King and Tanner crab fisheries in the Aleutians, Chignik, and South Peninsula.

There are also 60 foot limits in these federally managed fisheries:

- BSAI Cod fisheries
- Aleutian Islands Pollock.
- C class IFQs
- Gulf of Alaska Pacific Cod fisheries

The fisheries for these species above are not seine fisheries. They are harvested by trawl, pot, jig, or long line. There are vast differences between these harvest methods and seining. These other harvest methods give some advantage to a larger vessel over a smaller one in the actual harvesting of fish.

- **Trawling** involves towing a net on cables directly behind the vessel. The fish are caught in the net when the vessel overtakes them. Larger boats have an advantage as they generally have more horsepower and better sea keeping ability so therefore they can keep fishing in conditions where it is no longer feasible for smaller, less horsepower, vessels to continue fishing because they lack the power to tow the net at the proper speed.
- **Pot** fishing is done by setting traps on the sea floor to catch the fish or shellfish. The fish is harvested by pulling the trap to the vessel and emptying it. Larger vessels have the ability to keep pulling their traps and harvesting in weather that may be too rough for smaller vessels to do the same.
- **Jig** fishing is done by positioning the vessel over fish and putting hooks down in the water to catch the fish. The larger vessel is able to maintain harvesting in worse weather compared to a smaller boat.
- **Long lining** involves setting a line with many baited hooks attached to it which catch the fish. The harvest occurs when the line with the hooks attached to it is drawn aboard the vessel. The large vessel has ability to keep harvesting in rougher weather than the smaller vessel due to better sea keeping ability.

In contrast, **seining** involves manipulating a net between the vessel and its skiff which holds the other end of the net in place. The net is then towed upon to hold its position to trap the fish that swim in between the vessel and skiff. The vessel and skiff then come together so the net encircles the fish, the net is brought in, and the bottom of the net is closed up to prevent the fish from escaping. The

harvest takes place when the fish in the bunt end of the net are brought aboard the vessel. In this method the harvesting of the fish more depends on the proper functioning of the net rather than the size of the vessel involved. For a seine to be fished effectively it requires more finesse than power. The net harvests the fish, not the boat. Larger boats may be safer in rough seas but they still have the same difficulties operating a seine when weather is not cooperative. Larger boats catch more wind and are harder for a skiff to assist when weather conditions worsen. The larger boat drifts faster which causes the purse line to “fly” greatly reducing the nets ability to catch fish. If anything a bigger boat is more likely to break things like purse lines and cork lines in these conditions than a smaller vessel.

The other difference between these fisheries is in the way they are managed. The salmon seine fishery is managed by forecasting returns based on parent year escapement and other variables. During the season the return is constantly evaluated and the season is opened and closed in various areas based on observed escapements. The fishermen all use the same gear in the same areas for the exact same amount of time. The other fisheries are managed by a quota based on biomass estimates completed for each particular fishery. The fishery is opened and is closed when the allowed quota has been reached for that season. Also, many of these other fisheries take place during times of the year when the weather conditions are not as good as they are during the summer salmon season. Some of these fisheries are on an IFQ system so the fisherman with quota shares can go fishing when it is appropriate to do so.

Because the harvest methods, management, and economies of the other fisheries are vastly different compared to salmon seining it is hard to tell exactly where they fit in as an argument for or against removing the 58 foot limit for seining in Southeast Alaska because whether or not the limit is removed for salmon seining the other fisheries will remain unchanged. Additionally, many of the fisheries mentioned above are not done by fishermen who seine in Southeast. The fisheries with the most participation by those who also seine in Southeast are long lining for halibut and sablefish.

Alaska's sablefish and halibut fisheries

An outgrowth of the 58 foot restriction is the federal 35, 60, and 125 foot categories which National Marine Fisheries Service used to determine when observers needed to be aboard vessels and to prevent a full scale reorganization of the fleet which might have resulted from rationalizing the sablefish and halibut fisheries. The 58 foot limit influenced this and thus a 60 and 125 foot limit was used for regulation of observer coverage. But observer coverage is changing to include vessels under 60 feet. Electronic observer coverage may come into play as well. Once observer coverage is expanded the 60ft regulation may no longer be necessary because every fisherman has personal quota so the size of the vessel the fisherman catches it on should not matter.

Southeast Fishery Value, Inflation, and Purchasing Power

ADF&G and CFEC websites have charts showing harvest and effort along with fishery value. Looking at these charts it can be seen that effort has declined by approximately 35% since around the year 2000. Earnings per vessel bottomed in 2002 but have been increasing since until lessening in 2008 then going way up in 2011 in a combination of a huge return and prices that have not been seen in a very long time. Even with the banner year of 2011 it is fairly naïve to think the current trend will continue into the future. After all, who would have thought in 1990 that ten years later their processor would call them to say they were not needed anymore? It is great that the fishery has gotten some value back in recent years but this should not be a source of contentment and a reason not to look for new opportunity. There are still some indicators that are cause for concern and steps should be taken to ensure the economic viability of the fishery for the long term.

Has the value of Southeast's average earnings per vessel really been improving? When the fishery values are adjusted for inflation are things still improving? If participation levels today were like the 1980's would the value be the same? Is the revenue derived from the fishery keeping up with the cost of equipment? Is new equipment being built at a rate to replace aging equipment?

Average Earnings:

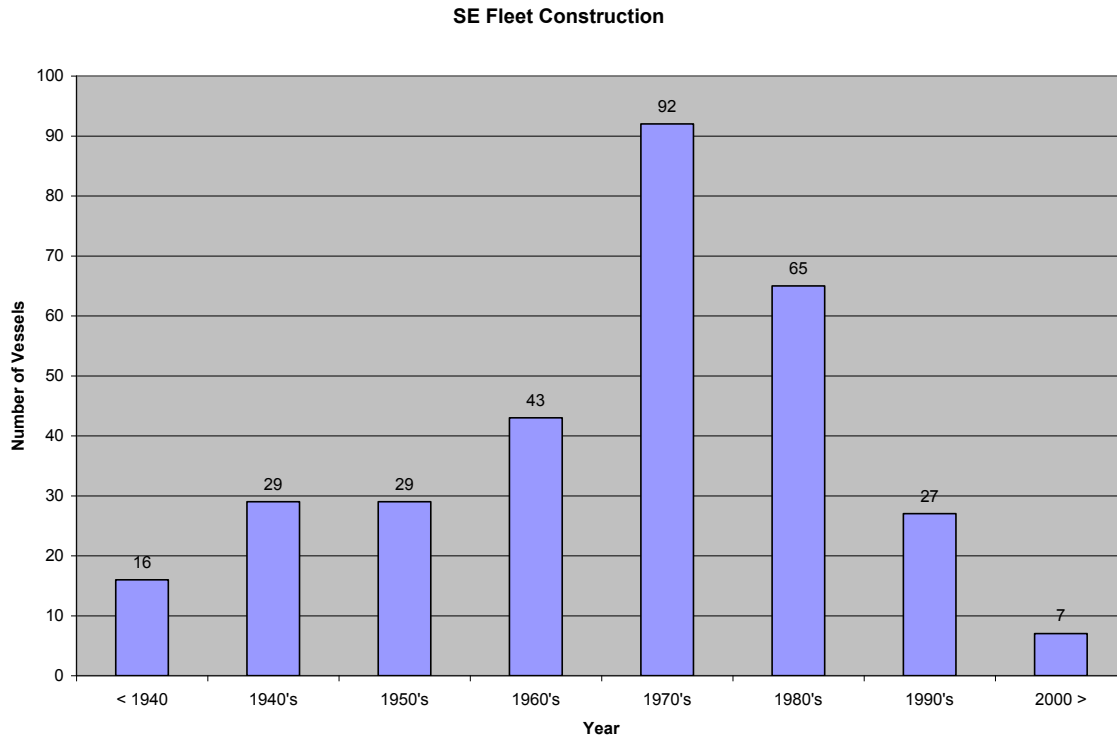
Some variables need to be considered along with the earnings data to better judge if the economies in the salmon seine business are improving. Participation levels in the fishery are a big factor. From 1978 - 2000 an average of 90% of the permits were fished. Since 2000 only 65% of the permits have been used on average. 1989 had a value of 91 million and an average gross of almost \$250,000 for 365 vessels. In contrast 2010 had a value of 56 million and an average gross of almost \$240,000 for 235 vessels. If participation in 2010 was at 1989 levels the average gross for a vessel would have been around \$170,000 which is much less than the 365 vessels averaged in 1989. Even though the vessels fishing in 2010 had what could be considered a good year the increase in average vessel earnings was largely due to decreased participation levels.

Inflation:

In attempting to get a good grasp on the economic state of the SE seine fishery it is important that the purchasing power of the dollar over time be included in the calculation. Using the above example comparing the 1989 and 2010 seasons and adjusting for inflation the average vessel earnings in 1989 of \$250,000 would equate to around \$450,000 in 2010. The average vessel earnings in 2010 were \$240,000 and would have been \$170,000 if participation was at 1989 levels. Incorporating for inflation the average vessel earnings in 2010 were \$210,000 to \$280,000 less than what was earned per vessel in 1989 with the purchasing power of today's dollar. This does not indicate an industry that is progressing.

Vessel Construction Costs and Purchasing Power

Understanding inflation and purchasing power can also help us understand why no new vessels are being constructed solely for the salmon fishery and minimal vessel construction is occurring overall. The following chart shows the vessels registered to seine in SE and the decades when they were constructed:



In 1976 a 58' vessel that was fairly well equipped cost around \$175,000. In the early 1980's a new steel seiner cost \$735,000 and fiberglass seiners were around \$600,000. In the early 1990's a wide body fiberglass seiner cost around \$1.55 million. When the purchasing power of today's dollar is incorporated that same vessel in 1976 would now cost over \$700,000. The steel seiner in 1981 would be around \$1.8 million and the fiberglass seiner would be \$1.35 million. The wide body fiberglass seiners built in the early 1990's would now cost \$2.67 million dollars. Unfortunately it is even worse. New construction costs have outpaced inflation. Steel seiners are now being built for well over \$3 million and the fiberglass isn't much less. When you compare the cost of construction to fishery value over time and incorporate inflation it is easy to see why building a new vessel for the salmon seine fishery would not provide an adequate return on investment.

In addition to the observations in this section a couple other important things to note are:

- In the 1970's and 80's there was a lot of new construction taking place. During this time there were double digit interest rates for financing. Today

interest rates are the lowest in history and the only vessels being built are dependant on fisheries other than salmon to pay for them. Money has never been cheaper to borrow and, compared to the past, there is nothing being invested into the salmon seine fishery.

- In the 1970's and 80's insurance premiums were 3% of the insured value of the hull and most boats were insured for full replacement value. Today there are insurance pools where the premium is still 3% of the insured value but a premium rebate is paid back if there are low claims in the pool. Most vessels insured today are not insured for full replacement value because it is too expensive. Even though insurance pools make the premium cheaper than it was in the past many fisherman can no longer afford to insure their vessels for the cost of replacement.

These points along with all the other things touched upon in this document show a need for improvement in the SE salmon seine fishery.

The expense associated with participating in the fishery has outpaced the income derived from the fishery and consequently the equipment in the fishery is aging and not being replaced. Proposal 285 will increase the options available to more cost effectively improve the fishery infrastructure.

How is vessel value determined?

Boats will not lose value if the 58' limit is lifted. The restriction on length alone does not determine value. Other criteria are much more significant.

Before assuming repeal of the 58' limit will make the current fleet lose value first determine what dictates that value.

Fishing vessels are all unique.

In order to determine vessel value several questions must be answered:

How old is the boat?

Is the hull wood, fiberglass, aluminum or steel?

Has the boat been properly maintained and kept up?

Are there upgrades on the boat to add more value?

What condition is the engine in and how old is the engine?

What does the boat pack in fish, fuel, and water?

Is the electronics package modern or basic?

What kind of accommodations does the boat have?

Is there anything extra included with the vessel such as a skiff, gear, or permit?

Where does the boat rank with others of similar, more, or less age and function?

The above questions dictate the value differences inherent between individual seine boats. Based on the vessel condition alone it is safe to assume that a newer large vessel in good condition with a recently overhauled engine and modern electronics would be worth more than a large old vessel in disrepair with an engine that smokes and makes odd noises from time to time. A smaller fiberglass vessel which is newer and more modern is worth more than a large old wood vessel that has not been maintained. Although there are different values between vessels fishery value is also a factor that causes values for the entire fleet of vessels to increase or decrease.

Surveyors and brokers contacted indicated one of the major drivers to fishing vessel value was the overall value of the fisheries the vessel participated in. If fishery value is high then vessels participating in that fishery would tend to have higher values and if fishery value was low then the vessels in that fishery would tend to have lower values. In short, if the fish business is good it tends to drive up vessel values regardless of vessel length.

The boat market follows typical supply and demand. If there are a large number of boats available they will tend to be cheaper and if they are scarce then they will be in higher demand and thus more costly. If fisheries are good more boats will be participating in them and therefore fewer vessels will be available to the sales market (less supply) and the ones on the market will see increased value (increased demand). Conversely, if fisheries are bad then there will be less boats participating and more boats will be in the market (increased supply) and

lower fishery values combined with a lack of interest in participation (less demand) will result in a decrease in value.

Not too long ago, when salmon fisheries had decreased value, there were more vessels available for purchase than what is currently available. Those vessels available at that time were sold at a price that is less than what similar vessels on the market are selling for now. Some examples:

- A wood 58' boat built in 1914 was sold more than 5 years ago for \$20,000 there are currently boats similar with an asking price of \$50,000.
- A steel 58' boat built in the 1960's sold for \$90,000 over 5 years ago and comparable boats to this, if you can find one, are now listed at \$300,000.
- A steel 58' boat built in the early 1980's sold around 5 years ago for \$730,000 and comparable boats today should list at over \$1.3 million. A vessel of similar dimension built in 2009 is on the market for \$2.9 million.

The vessels in the example above are clearly valued differently based on individual characteristics. The overall value increases throughout the spectrum were also dictated by an increased fishery value.

Would removing the 58 foot limit have a detrimental effect on vessel values?

Again, vessel values fluctuate with fishery values regardless of the vessel length so the appropriate question then becomes would removing the 58 foot limit have a detrimental effect on *fishery* value? The answer is no. Salmon is a global commodity and the fishery value is determined by size of the run and the price of fish and the levels of harvest. True, increasing boats distributes the available benefits to more participants but this would be more a function of fishery value as well. If more people are involved in the fishery obviously the better the fishery is positioned to support that increase. When the value drops due to poor returns or poor prices it would be expected that participation would decrease as people left the fishery leaving benefits behind for participants who decided to stay in the fishery. This would happen regardless of what size of vessels was used in the fishery. Fishing is cyclical and vessel values have mirrored that throughout recent history. If it were the case that adding bigger boats into the fleet would devalue the existing fleet it would have already happened with the sponsoring and wider vessel construction taking place today. To say that allowing longer boats into the fishery, especially if it requires two permits to do so, will devalue the fleet is simply not true.

Proposal 285 is designed to enhance future fishery value for the Southeast seine fleet. It should not have negative effect on existing vessel values. The existing fleet will still participate, still be competitive, and will have increased fishery value from the consolidation of permits and units of potential competing gear removed from the fishery.

Proposal 285 gives fishermen who wish to upgrade their equipment or diversify their operations more options to do so. Those who do not wish to change certainly do not have to but to say someone who upgrades their operation is

devaluing yours is nonsense. The fisherman upgrading may be adding value to his business but it is not being done at another's expense. A vessel lengthened to 65 feet may be valued above its previous peer group of 58' vessels but it certainly would not decrease the value of those vessels. It does not "devalue" anything; it simply opens up more options in a wider range of vessel sizes than are currently available. If anything the value, and subsequent price, of a longer vessel may increase with the value of the fishery it is now able to participate in. Again though, nothing indicates the existing fleet would be devalued as a result.

There are some other aspects of Proposal 285 which were included to further ensure the preservation of vessel values:

The 58 foot limit was taken out of Alaska statute and responsibility was given to the Board of Fish to make decisions on an area by area basis. Proposal 285 is only applied to the salmon seine fishery in Southeast Alaska. Southeast would be the only area where vessels longer than 58 feet are allowed to fish. Vessels 58 feet and under are permitted to fish in every other salmon seine area in Alaska likely making them more desirable. Additionally, the other fisheries with 60 foot limits will also help maintain the desirability of the existing fleet. In short, the existing 58 foot and shorter vessels will always have value to someone.

There will not be a big flood of vessels entering the fishery devaluing the existing fleet. As with any business decision, it has to make economic sense to buy in and removing the length limit does not mean people will enter the fishery. It has to be a good fishery. For new participants and equipment to be brought into a fishery it would have to be taken out of another fishery and there would be an opportunity cost in doing so. The requirement of two permits to bring in a longer vessel is a big part of this decision. Realistically it is a better assumption that there would be a greater amount of vessel upgrades by existing participants than the amount of new fishermen and vessels entering the fishery. The reason for this is existing participants be able to add length to their existing boat up to 65 feet without acquiring another permit. Existing participants already own a permit and therefore would have to buy only one more to bring in a new vessel over 58 feet. Potential entrants outside the fishery who do not own a permit would have an extra burden of purchasing two permits and if they wish to bring in a vessel longer than 58 feet. The condition of having to hold two permits to bring in a vessel over 58 feet greatly decreases chances of a substantial amount of new participation and should alleviate concern over a new influx of vessels devaluing the existing fleet.

There is a popular belief that Proposal 285 will reduce vessel values. The information in this document goes a long way toward dispelling that belief. The purpose of Proposal 285 is to create greater economic returns and efficiencies in the fishery and if the fishery is in a more valuable economic position, vessel values will reflect that as well.

Positives of Eliminating the 58' Rule for Existing Vessels

Much of the debate regarding removal of the 58 foot limit is focused on new vessels entering the fishery. Proposal 285 would require new boats over 58' entering the fishery to hold an additional permit but would allow for existing vessels in the fishery to add length up to 65 feet (or maybe more depending on the Board's discretion) without having to purchase another permit.

Adding length to a boat is less expensive than widening and far less expensive than acquiring a new or used boat of greater size. To build a new vessel will cost in the millions of dollars. Upgrading to a used vessel could cost hundreds of thousands of dollars. A shipyard owner indicated the following: Widening an existing vessel could cost around \$250,000 – \$300,000. However, just adding some length to the stern could cost around \$50,000 or \$60,000 or maybe less depending on how it was done. There are many benefits that could be had by just adding more space to the stern of a vessel. The following are some of the positives additional length would provide:

Extending the stern helps the vessel float better when loaded. It allows safer packing of fish in the aft holds of many boats that would otherwise not be safely utilized which improves the economic efficiency of the boat. Loaded or overloaded boats typically "squat" or sit lower in the stern compared to their trim when empty. Some vessels in the fleet are currently "overtanked" and adding length may make it so they are able to safely use all the available space for packing fish. Some processors have indicated that quality issues sometimes arise from vessels that don't have adequate flotation to use their aft tanks to ensure proper quality of the catch. This discrepancy also causes the front tanks to be over packed which jeopardizes the quality of those fish as well because not enough refrigerated water remains for proper circulation. Adding length and thus buoyancy to the stern of the vessel improves this condition.

Commercial fishing is a notoriously dangerous occupation and anything that could provide increased safety would be a huge benefit. There are many insurance pools with seiners who participate in Alaskan salmon fisheries. These pools would realize tremendous benefit in allowing fishermen in their pools to do anything that would increase safety in their operations. Some injury claims are unavoidable, accidents happen, but there are many more which could have been avoided with an increase in the working area available on lots of these vessels. The deck space available on many 58 foot and smaller seiners is cramped at best. Additional length to the stern would create more working deck space. There is a lot going on when gear is being worked and the ability to increase space in the working area would help eliminate many unsafe situations that happen. The net could be stacked further back from the house allowing more room to walk around open hatch covers so nobody falls in. There would be more room to repair rips and fouls in the net in a much less time consuming and

cumbersome manner. Added length reduces crew having to stand on the stern rail or side rail to stack the net, spread and clear the bunt, or hook up the skiff for the next set. There is more room for the skiffman to get in and out of the skiff.

Adding length would provide more pot storage if the vessel is involved in any fisheries where hauling more gear may improve efficiency. Also, pots could be stacked further back on deck creating more working space forward for baiting, hauling, sorting, etc.

The stern extension, depending on the design, would decrease fuel consumption if it was designed to reduce drag. Longer boats move through the water more efficiently. It improves the boats ride in a following sea or bucking into the swell. The extension piece could also be used as additional ballast depending on its configuration. Vessels could pack additional fuel for long voyages taking better advantage of buying more fuel when it is cheaper or receive quantity discounts. Adding additional length even benefits shallow draft hulls because there is more "lift" to get the vessel on a plane in a shorter period of time. Also, at day's end, the skiff could be put on deck instead of towing it without overloading or trim concerns.

Fishermen today are being forced to do more with less. The ability to enhance value is an important part of this idea. Fishermen who choose to could use the new space created to explore various means of pre-processing or value adding their products. There would be more room available on deck to sort, bleed, cut, or whatever the chosen method might be to further enhance value. It difficult to tell the extent of value adding that will take place if the length limit is removed but the important thing is the option to explore possibilities will be there. Using this proposal solely as a tool to increase capacity is not the answer because adding volume does not have nearly the positive effect as adding increased value. High volumes tend to exacerbate problems with declining value. Over time, more will eventually become less. There have been no significant advances in product quality since RSW was introduced to the fleet. It is important that fishermen are allowed and encouraged to continue to discover ways to increase the value of what they produce.

Concerns about Proposal 285

Removing the 58 foot limit is viewed by some as a big change and there are some concerns about it. Hopefully the following will alleviate some of those concerns. The following arguments against removing the 58 foot limit were taken out of various documents submitted at the last SE Board meeting in 2009 as well as the statewide meeting in Anchorage in March of 2010:

Allowing larger vessels to seine might reduce the value of existing vessels that are 58 feet and shorter.

This subject was already addressed in the section about how vessel value is determined. There should be no reduction in vessel value as there should be no reduction in fishery value.

Large vessels would be more efficient in harvesting salmon than smaller vessels.

Having the ability to use a vessel over 58 feet does not mean vessels over 58 feet will be better than status quo. Many fishermen use boats that are less than 58 feet. Every salmon seine fishery in the state has vessels of different sizes. Boats are a tool used to do a job. Some are shallow draft to get close to the shoreline. Some are more maneuverable to fish in tight areas. Some have more horsepower and speed to beat their competition to the next set. The fleet in Southeast has a packing range from 30,000 pounds all the way up to 200,000 pounds. **Large and small vessels have different capacities but they have the same ability to harvest salmon. If a disparity in harvesting efficiency between large and small boats was a big concern then this issue likely would have been addressed as vessels have become wider and deeper.**

These differences have existed for years but what maintains the balance is every seiner in the fleet is held to using the same net in the same open areas for the same amount of time. Salmon harvests are managed by time, area, and gear and will continue to be with or without the length limit into the future. ***The net catches the fish, not the boat.*** In salmon seining it is the skill and knowledge of the skipper which dictates the level of success the vessel will have harvesting fish. A skipper who chooses to fish on a particular hook off during an opening will be more or less successful than a fisherman who chooses to fish on another a few miles away regardless of the size of vessel they operate. There is concern that Proposal 285 disadvantages people. Disadvantaging someone means holding them back or taking something away from them. Nothing will be taken away from another by removing the length limit. Just because a bigger boat has the ability to hold more fish does not mean the boat holding less will catch less fish than it previously could. If a vessel holds 100,000 pounds it does not mean it will catch that amount every opening. A vessel holding 100,000 pounds is not limited to 50,000 pounds if it is fishing next to a vessel that holds 150,000 pounds. To say eliminating the 58 foot limit gives a competitive advantage is only true if other people are limited in the same opportunity. In this case, everyone would have the same opportunity. It could be argued affordability is a

limiting factor and fishermen who could not afford to upgrade it would be disadvantaged. The counter to this thinking is it may not come down to affordability but more so what someone chooses to spend money on. Some would not see value in spending money for the upgrade and some would but the decision should be based on the individual's position and not the position of others.

Larger vessels would have easier time fishing in tougher weather.

There has been repeated concern that a larger vessel has potential to fish in more inclement weather. This is not true. **The net catches the fish, not the boat.** Larger boats may be safer traveling in rough elements but they still have the same pitfalls operating a seine when weather is not cooperative. Seining requires some finesse in how the net is hauled. Increased wind causes the boat to drift faster making the purse lines "fly" which greatly reduces a net's ability to hold fish. A bigger boat catches more wind and would have more difficulty. Whether the boat is 58 or 68 feet bad weather is still bad weather. Accidents that happen while fishing in rough weather are not entirely dependant on the size of the vessel. All seine vessels have the same nets, tow lines, and rigging which all share the same propensity to fail and cause injury. The operator of the vessel bears this responsibility regardless of the size of the boat. Additionally, in seine fishing everyone has a skiff. A bigger boat catches more wind and is heavier making it more difficult for it to be towed by the skiff. Usually the first thing that goes wrong in rough weather is something bad happening to the skiff which affects everyone equally.

If larger vessels are allowed to participate in highly competitive fisheries the potential for collisions may increase.

Currently, the Sitka Sound sac roe herring fishery is known as one of the most competitive fisheries in the US if not the world. There is no length limit in the Sitka fishery. Collisions take place in that fishery on an increasingly regular basis. The collisions involve boats of all different sizes but the common denominator is the skipper of the vessel. Vessels themselves do not cause collisions, their skippers do. All vessel operators are aware of the maneuvering capabilities of their boats. It is the responsibility of the skipper to operate the vessel within its safe maneuvering capabilities. It is not fair to say that an increase in larger vessels in a fishery would correspond to an increase in collisions.

PROCESSORS NEED BOATS



Longer boats with greater capacity will not result in processors using fewer boats to catch and tender the same amount of fish.

If the 58 foot limit is removed there will not be an immediate change in the fleet make up.

The current regulation has been in place for well over half a century. It is irrational to think that the fishery will be "overrun" with large capacity vessels taking fish from the smaller vessels at the pleasure of the processor. Processors will always need boats to catch fish for them. In fact, many processors in Southeast Alaska are looking to expand their fleets. There will be a need for many vessels, regardless of size.

Processors can only handle so much volume regardless of the amount of vessels they employ.

Processors typically hire more fleet capacity than they can process. In years of low run size they need as much fish as possible and more boats means more nets in the water and a better chance of getting more fish. When the run comes strong the fleet is typically put on limits to match the packing ability of the company so the size of boat bringing fish to them is irrelevant as the limits are the same.

The long term health of the tender fleet is a separate issue but the trend is obvious.

Tender fleets are declining and no vessels brought in to replace them. Buy back programs took a lot of tenders out. Accidents and age are taking the rest. Processors compete for tenders every year. Many companies have delivery programs for their fishing boats. With fuel on the rise tenders are becoming more expensive to use and tender coverage has been reduced.

The “Graying of the Fleet” is a source of concern.

The “graying of the fleet” is recognized as a potential problem in some Alaskan fisheries and this could be the real reason Proposal 285 is feared by some fishermen.

Recent statistics indicate the average age of a SE seine skipper is over 60 years old. The average age of the vessels used in the SE seine fishery is 42 years old. These two statistics show fairly clearly that the majority of the participants in the SE seine fishery have been there for a very long time and there are not as many younger fishermen who are able and/or willing to make investments to take their place. Steps like Proposal 285 need to be taken to make the salmon seine business attractive to investment by a new generation of fishermen.

Unfortunately, some of the older fishermen today may be a bit out of touch with the economic state of the fishery. The return on investment required from their operations is substantially less because all of the equipment and permits they are using were purchased and paid for a long time ago. This is the group most likely to contend the fishery is “fine the way it is” which is an easy statement to make when everything is paid for. It is much easier for a fisherman to make it financially through the ups and downs of a cyclical fishery if there isn’t a pile of money going to debt service in addition to all the other expenses of operating. Additionally, if the equipment has been long since paid for and the fishermen are nearing the end of his career more emphasis would be placed on preservation of asset value to sell for retirement rather than investing to increase value. Most fishermen near the end of their careers would not be inclined to upgrade their own equipment and therefore less supportive of others upgrading theirs. It is unfortunate that this position can hold back opportunities for others to keep innovating.

The hard truth is the salmon seine fishery is not “fine the way it is.” It doesn’t take much of an economic background to see that the fishery has declined from where it has been in the past in terms of economic recovery and return on investment. It is really discouraging there are fishermen who would cling to a rule designed to reduce opportunity and hold the fleet back as if it were the only thing helping the seine industry survive.

Proposal 285 and the SE Fleet Consolidation Program

There have been efforts toward the Southeast Fleet Consolidation Program for many years. During 2009 and 2010 Board meetings the bid process had not taken place and the amount of permits to be purchased was unknown. Also, in March of 2010 an agreement between Processors and Program representatives established the Reduction Program could not cause the total number of permits available to fall below 260. This measure helped ensure the companies there would be an adequate amount of vessels to meet their processing needs into the foreseeable future. Fortunately, the bid process has now taken place and the number of permits to be removed from the fishery is public knowledge. 62 permits will be removed from the fishery if the Program is approved which will leave 317 permits in the fishery. Participation averages around 250 permits recently which leave 67 permits as outstanding capacity in the fishery. Now that numbers are known the only question remaining is whether the Program will be approved or not. Conveniently, this leaves only two options to consider how the Consolidation Program will mesh with Proposal 285:

Scenario #1: Southeast Fleet Reduction Program Approved

If the Program is approved then Proposal 285 is a good way to supplement the Program and further reduce units of gear in the seine fleet. Many in the fishery feel permit numbers should be lower and the Program didn't go far enough. With Proposal 285 longer boats could enter the fishery via permit stacking and the fleet would benefit from a unit of gear being removed from the fishery without being taxed for it. The processors should be comfortable their volume needs will still be met as it should be assumed for each additional permit removed from the fishery the corresponding vessel would be longer and likely have a greater capacity. Units of gear would be removed from the fishery while the capacity levels within the fleet would not decline as much.

Scenario #2: Southeast Fleet Reduction Program Rejected

If the program is rejected then Proposal 285 is still necessary and relevant. One reason the Program could be rejected is the remaining participants in the fishery feel the tax they would pay is excessive for the benefit the Program would provide. Even though everyone agrees that some form of capacity reduction is necessary in the fishery there is some disagreement as to how it should be paid for. In this case Proposal 285 allows for permits to be stacked for the additional fishing privilege of fishing a boat longer than 58 feet. Along the same lines as the Program this benefits the fleet by reducing competing units of gear but it places no additional cost or tax burden to the fleet. The fleet may look into additional options associated with permit stacking to further reduce the amount of permits. Proposal 285 is a good first step in this direction.

Whether or not the Consolidation Program is approved Proposal 285 will still be a benefit to the SE salmon seine fishery.

Some Closing Thoughts

The current fleet continues to age, sink, and be removed from the fishery without being replaced because it is not cost effective to do so. There will eventually be a need for an increase in capacity as vessels are lost. To achieve an increase in capacity, which will be needed, without an increase in competitors, which is not wanted by the fleet, the existing fleet must have an easier path to expand. Sig Jaeger saw this years ago when he said, “When you start to limit vessels by size, you distort what is usually a natural process and you create a resistance to further change when later on it becomes necessary.”

Things seem to be improving and 2011 was a huge year. 1989 was a huge year as well but who could have foreseen eleven years later processors would be reducing their fleets. Fishing will always be a cyclical business. This is why diversification is necessary for the fleet to be able exercise as many options as possible and have the ability to embrace new opportunities when they arise. Fishermen need better choice in what kind of vessel they use rather than the constraint of some arbitrary limit that was designed to keep them from additional opportunities.

Proposal 285 could tend to benefit Alaskans specifically because they have access to financing only available to Alaskan residents at cheaper costs and better rates than fishermen outside Alaska. This gives Alaskans a better avenue to upgrade their equipment expand their businesses. This proposal isn't so much about fishermen diversifying into SE Alaskan salmon as it is about providing Alaskan residents with the ability to diversify into other Alaskan fisheries as well as fisheries all over the West Coast.

Proposal 285 will not solve all the seine fishery issues but it is an important step for the seine industry to continue to innovate and improve itself by having more options and opportunities in the future. This proposal isn't only about longer boats entering the fishery. The proposal attempts to provide sustained benefit and economic viability to all fishery participants. A Memorandum to the Board from the Alaska Department of Commerce dated March 9, 2010 said, “While proponents of the proposal argue that the change would minimally impact the industry, opponents agree that the impact would be small and, therefore, argue that the change is unnecessary.” It is true that there would not be an immediate impact to the fishery. This Proposal is designed for long term benefit rather than short term fixes. Many years of Legislative effort have made it possible for the Board of Fisheries to act on Proposal 285. Please support this proposal and encourage innovation in the Southeast Salmon Seine Fishery.

ATTN: BOF Comments
Board Support Section, ADFG
PO Box 115526
Juneau, Ak 99811-5526

Fax: 907-465-6094

Dear Chairman Johnstone and Members of the Board,

I am writing to ask you to reject Proposal 212. My husband and I are Sitka residents and members of ALFA and the Fishery Conservation Network (FNC).

When we first became part of the FNC I was skeptical. Could you really avoid bycatch by sharing information? Would fishermen even share information? But once again, the commitment of the Southeast Alaska longline fleet to conservation and stewardship has amazed me. I am proud to be part of a group that has worked so hard to develop the tools we need to control our rockfish bycatch. I have seen volunteers put in hundreds of hours collecting and recording data and translating it into multi beam sonar maps that give us the information we need to harvest our targeted species without exceeding rockfish allowances. Even though we have not taken our full allocation in years, we have been willing to invest the time and energy into building a strong management tool that will keep us in within our rockfish allocation as halibut stocks rebound.

It is my belief that by accepting Proposal 212, you would be punishing one user group for their forward thinking and their commitment to the future health of rockfish stocks, and rewarding another user group for overfishing and exceeding their allocations.

In closing, bycatch overage IS avoidable, and we, the members of ALFA and the FNC have proved it. Rewarding overfishing sets a poor standard for fisheries management. Please reject Proposal 212.

Thank you,

Wendy Alderson and Jason Gjertsen
F/V Katie J

February 8, 2012
3652 Lindsay Hill Road
Quilcene, Washington 98376

Attention: Board of Fish Comments
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear members of the Alaska Department of Fish and Game Board of Fish,

Please accept the following comments for inclusion in the 2012 Board of Fish meeting book for the upcoming Ketchikan meeting.

I will be attending most of the Board of Fish meeting and I am available to serve the Board in any fashion relevant to the meeting.

Sincerely,

Joel Kawahara

Proposal 250

I oppose proposal 250, "Allow for the retention of king salmon in freshwater streams in Southeast Alaska Area as follows:"

My reasons for opposing 250 are based on conservation of king salmon and on the existing opportunity to harvest king salmon in marine waters of Southeast Alaska.

The vast majority of king salmon spawning streams in Southeast Alaska are very small and support runs of less than 1000 fish. Some harvest of these small runs occurs in marine waters by sport and commercial mixed stock fisheries. The commercial fishery has been restricted in time and area to protect these small runs. The sport fishery also has restrictions in time and area with a closure of parts of Behm Canal behind Ketchikan as one example (5AAC 47.021 (j)(2)). Since strict conservation measures are already in place to protect these small runs, it is unlikely that any of them could support in-river fisheries.

There are a few larger rivers feeding into Southeast Alaska, including the Taku, Stikine, Chilkat, Chilkoot, Situk and Alsek. There are king salmon management plans for these rivers and king salmon are allocated to specific users on each of these rivers. In the case of the Transboundary Rivers, king salmon harvest is regulated under provisions of the Pacific Salmon Treaty. Allocation to Canadian fishermen is a major part of the treaty and the Board of Fish can not change the allocation of king salmon in the treaty on its own.

The existing mixed stock marine king salmon fishery harvests many times more king salmon than would be available to river fisheries. If the Board of Fish were to establish in river king salmon fisheries, there would have to be an equivalent reduction in harvest of Southeast Alaska origin king salmon in the marine fisheries. This would result in the lost opportunity on thousands or even hundreds of thousands of king salmon in the marine fishery. As a person invested in the marine portion of the Southeast Alaska king salmon fishery, I do not support losing my fishery so a hand full of people can fish in river.

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Proposal 255

I oppose proposal 255: "Establish a Taku River king salmon sport fishery as follows"

The Pacific Salmon Treaty is very clear on this issue. Annex IV, Chapter 1 Transboundary Rivers Taku River Chinook section specifically states:

(iv) Unless otherwise agreed, directed fisheries on Taku River Chinook salmon will occur only in the Taku River drainage in Canada, and in District 111 in the U.S. "

In order to establish a directed sport fishery on king salmon in the Taku River, the Transboundary annex of the Pacific Salmon Treaty would most likely have to be re-negotiated.

A substantial catch of Taku River king salmon occurs in Taku Inlet. Any effort to create a sport fishery in-river would require an equivalent reduction in the Taku Inlet sport fishery. I do not believe the Board of Fish will find political support to infringe on the Taku Inlet sport fishery.

The issue of fairness with the rest of Alaska being able to fish in-river for king salmon is a red herring. Each fishery is different, each river is different. I urge the Board of Fish to reject the argument of fairness when considering this proposal. Fairness as a criteria for civil rights stems

from “all men are created equal” and is unavoidable. Unfairness in fisheries stems from biological differences in fish and rivers and is also unavoidable.

Proposal 277

Allow the use of dip nets in the Taku River for personal use.

I oppose proposal 277 based on implications of the Pacific Salmon Treaty and on impacts to juvenile chinook and sockeye rearing habitat. I also believe the safety issue to be misrepresented by the proposers.

Pacific Salmon Treaty does not allow additional gear types.

PST, Article IV: Conduct of Fisheries, paragraphs (3), (4), (5), and (6) describe the establishment of fishery regimes for each Party and are attached to the treaty in Annex IV. Paragraph 7 states that each Party shall establish and enforce regulations to implement the fishery regimes adopted by the Parties.

The Pacific Salmon Treaty Annex IV, Chapter 1, Transboundary Rivers, paragraph 3, subparagraph (b) the Taku River, Section (1) Sockeye salmon, subsection (iii) The management of U.S. and Canadian fisheries shall be based on weekly estimates of the TAC of wild sockeye salmon.

The management of the US and Canadian fisheries requires weekly updates of the fisheries catch statistics in District 111 (sub-areas 11-20, 31, 32, 33, 34) and the Taku personal (seasonal estimate) use fishery.

There is a direct relationship between the fishery regime for the Taku river and the seasonal estimate of personal use harvest. Changing the gear types and amount of gear by allowing dip nets will change the fishery regime and hence the seasonal estimate of catch. This may impact the escapement of sockeye, an action the treaty was enacted to prevent.

The “WHO IS LIKELY TO SUFFER” response for Proposal 277 indicates it may be Canadian fishermen who suffer. The treaty does not allow this to happen because of unilateral actions on the part of the U.S.

Impacts to salmon habitat on the Taku River.

The proposal does not describe the areas dip nets would be allowed, or if there would be bank and boat dip netting. The proposal does not estimate the number or growth of personal use fishers using dip nets should the proposal pass. It must be noted that the growth and subsequent habitat issues caused by the Kenai and Copper Rivers dip net fishery were not estimated or

anticipated. It would be prudent to know what might happen to the habitat along the Taku River prior to allowing the use of dip nets.

The following comments are derived from "Seasonal Habitat Utilization by Juvenile Salmon in the Lower Taku River, Southeast Alaska" NWAFC PROCESSED REPORT 88-32, December, 1988.

The Taku River below the Canadian border is used extensively by juvenile salmon for both migration and rearing. Rearing salmon dominate the population except in May when migrating smolts dominate. Rearing coho were most abundant in beaver ponds while sockeye and chinook were most abundant in channel edges. (Abstract, NWAFC 88-32)

Channel edge habitats ranged from 1 ft. to 4 ft. in depth. (Table 2, NWAFC 88-32)

Densities of juvenile chinook and sockeye in channel edge habitat is at a minimum in July and increases through October when apparently these fish moved into side sloughs to overwinter. (p. 9-12, NWAFC 88-32)

My conclusion from the NWAFC report is that in the lower Taku River, channel edge habitat is use extensively by both chinook and coho. Thus it is important to know the extent of habitat disruption a dip net fishery would have on channel edges. Potential impacts to the rearing habitats of these very important species may have serious impact to their populations.

The United States and Canada are also bound by the Boundary Waters Treaty of 1909 which provides that "boundary waters and waters flowing across the boundary shall not be polluted on either side to the injury of health or property on the other." Because the sockeye of the Taku River are spawned on the Canadian side of the border and are a shared resource of both countries, habitat degradations in US waters that harm sockeye populations would potentially violate the Boundary Waters Treaty.

I also point out that the Sustainable Salmon Policy specifically addresses habitat disturbance in section (c) "Management of salmon fisheries by the state should be based on the following principles and criteria, (1) wild salmon stocks and the salmon's habitats should be maintained at levels of resource productivity that assure sustained yields as follows:.."

I strongly urge the Board to follow this policy guidance and reject proposal 277 based on potential impacts to salmon habitat.

Safety of navigation and fishing on the Taku River

The proposers briefly discuss unsafe fishing conditions "depending on flow levels" at the existing Canyon Island set net areas. ("WHAT WILL HAPPEN IF NOTHING IS DONE" response) It is my belief that increasing the number and geographical distribution of fishers along

the Taku River in the summer months will simply put more people in the way of floods, based on a USGS report.

The USGS has prepared a study of floods on the Taku River: "Hydrology and Glacier-Lake Outburst Floods (1987-2004) and Water Quality (1998-2003) of the Taku River near Juneau, Alaska", Scientific Investigations Report 2007-5027. Table 1 of this report provides a summary of glacial-outburst floods recorded at the Taku River gaging station from July 1987 through September 2004. Significant floods occurred from about mid June until mid October in that span of years. Flood components were more than double base flows in the larger floods.

If the safety of fishing during high flow is of concern, it is not likely that dip net fishing will be safer than set netting during floods.

Proposal 278

I oppose proposal 278 based on Pacific Salmon Treaty Transboundary River Annex considerations.

Increasing the length of the personal use fishery period in the Taku will substantially alter the fishing regime on the Taku and will likely require Pacific Salmon Commission approval.

Lengthening the personal use fishing season will increase catch in the personal use fishery, creating an allocation issue the Board of Fish must deal with should they enact this proposal. The sockeye in question are allocated between Canada and the U.S. through the treaty and the Board of Fish can not unilaterally alter the terms of the Pacific Salmon Treaty.

Regarding the safety issue of having a longer season, the flood season on the Taku has been from mid June to October over the time period 1989 to present. There is no predicability of these floods, so regardless of when a person with limited time plans their personal use trip, the river may be in flood conditions and unsafe and unfishable.

The proposers do not list anything under "Other Solutions Considered". The Board of Fish may wish to suggest a reservation system for the personal use fishers. The National Park Service regulates the number of vessels visiting Glacier Bay National Park and many other sites around the nation. The ADFG could notify the personal use fishers that a reservation system exists, and it could be privately run by the Taku Users Group. Such a reservation system would not have the force of law, however, the existing system of first come, first served is also informal and not codified. I do not believe the Board of Fish needs to engage with this issue until the Taku Users Group has tried all of the options available to them.

Proposal 312

I oppose proposal 312 because it attempts to supersede the Sustainable Salmon Policy (SSP), 5 AAC 39.222. I also reference existing data from ADFG that shows the Southeast Alaska coho stocks meeting their spawning escapement goals and the long term allocation goals, contrary to the claims of the makers of Proposal 312.

The SSP delegates the management of salmon fisheries to the area managers with guidance from the Board of Fish in the fishery management plan. The first goal of the management plans is conservation of the salmon stocks and then allocation as determined by the Board of Fish. Proposal 312 requires the Board of Fish actively manage Southeast Alaska coho salmon instead of allowing the SSP and ADFG to do its work.

Proposal 312 states that conservation and allocation are not being achieved by the area managers and requests the Board of Fish step in and curtail the troll fishery. No supporting documentation is presented by the proposers - implying that the Board of Fish must verify the conservation and allocation status of Southeast Alaska coho if the Board is to act on this proposal. This is not the Board of Fish's job, unless you want it to be.

Should the Board of Fish decide they want to be actively involved in Southeast coho management, they will open the flood gates to proposals in each and every fishery where someone thinks they can get a different deal from the Board than from existing policy.

The Board will also have to actively review all pertinent biological data of all fish they chose to deal with. If the Board does not use the best available scientific information on each fish they chose to manage, they will certainly face legal challenge to their decision.

ADFG Special Publication 11-23, Coho Stock Status and Escapement Goals in Southeast Alaska states "We identified no coho salmon stocks of concern in Southeast Alaska". The text of Proposal 312 stresses conservation of the coho salmon resource as a motivation for proposal. Because ADFG does not identify any coho salmon stock of concern, I believe there is no conservation reason for the Board of fish to support this proposal.

ADFG Fishery Management Report No. 11-10, "Annual Management Report for the Southeast Alaska/Yakutat Salmon Troll Fisheries" publishes the distribution of coho salmon harvests by commercial gear group in Table 3, page 22 and compares those catch percentages to the Board of Fisheries Allocation established in 1989. The deviations from the allocations for the period 1989 to 2010 is +3% for troll, -5% for seine and +2% for gillnet. Based on these results, the long term management of the coho fishery by ADFG staff complies with the Board of Fisheries Allocation plan to a very high degree and Proposal 312 should not be supported.

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BOARDS



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Chairman Johnstone and Board members,

I am writing this in support of proposal # 325 .

My name is Ryan Kelly. My wife and I along with our two sons have been trolling Southeast Alaska since 2006. Before 2006 I had been involved in fisheries in Washington State, and Bristol Bay Alaska. We are a family operation and enjoy the lifestyle that trolling offers us.

Each year that we have been trolling we have been targeting Chum salmon more and more. The opportunity to fish for Chum in Icy Straight last year was a great boost to our fishing income for the year, at a time when fishing can be spotty for us. The Chum in this area were the best quality we have seen, and our bycatch was next to nothing.

Proposal #325 is very important to us as it is a great opportunity for us to increase our chum harvest of the finest quality Chum salmon we see all season.

Please adopt #325

Sincerely,

Ryan Kelly
F/V Mojo
PO Box 2275
Wrangell, Ak 99929

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

February 7, 2012

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Dear Chairman Johnstone and Board members,

I am a longtime chum troll crewmember. I grew up on the back deck of my dad's boat landing chums with my brother. Both Karl and I suffer a bit from sea sickness so my father adjusted his trolling toward calmer waters starting in about 1988. I love fishing chums and pinks because it is in calmer waters and when we were younger it meant evenings in places like Elfin Cove, Hoonah, and Sitka where we could play basketball and hang out with other crew members.

I seined for 9 years with a highline seiner, and while I enjoyed the money and crew, the fishery I have come back to the last 7 years is trolling chums with my father and mother. One of the enticements in chum trolling has been helping my father pioneer new chum fisheries, new gear and techniques for handling fish. I particularly like the Icy Straits fishery because the fish are chrome brite and there is virtually no by-catch. While I love conking big Chinook when we are targeting them, I loathe, as my dad does, shaking them during non-retention coho fisheries. I see hardly any Chinook when we are targeting chums.

I have read and understand proposals 325 and 326. It just makes good sense to develop a troll management plan for chums in Icy Straits when we are catching 600 chums per Chinook. I understand 600 chums per Chinook was the troll average when targeting chums in Icy Strait last year. I am sure it was much less on our boat perhaps because we have been targeting chums for over 20 years.

I am really looking forward to helping pioneer new hatchery chum areas as proposed in the Hawk Inlet and Amalga Harbor area. If these work out I might even buy into the troll fishery so I can give the opportunity to my son to work on the back deck with me as I did with my father, he did with my grandfather, and my grandfather did with my great grandfather.

Sincerely,

Kris Jordan

Kris Jordan
1843 Olympic Drive East
Monmouth, Or 97361



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

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BOARDS

Dear Chairman Johnstone,

Thank you for the opportunity to comment on Board of Fish finfish proposals. I am writing because passage of proposals #325 and #326 by the Chum Trollers Association, of which I am a member, are extremely important to my business, sustainability of our wild salmon resource, and equity in SE enhanced salmon harvest.

I have been fishing in Alaska since I started salmon crewing in Southeast in the 90's. I have been power trolling chums in SE Alaska since 2005. Success in trolling chums has helped me increase my fisheries investment in the longline, dive fisheries, and purchase a freezer troller, F/V "Equity".

In 2011 I applied for and received grant funding from US Treaty Troll Chinook reduction mitigation funding to develop and test a system for frozen at sea chums. During the 2011 gillnet season, I traversed the area proposed in 326 numerous times in July on my way to and from the District 15 gillnet openings. I am confident, based on my experiences chum trolling, that there are enough chums and working space in this proposed area for a productive troll fishery. I noticed very little, if any, sport effort in the depths chum trollers would be working.

My business plan for 2012 includes targeting and freezing troll chums in Icy Strait. My initial contact with my buyers indicates strong interest in these chrome-bright troll quality chums. As a successful young Alaskan fisherman I see these proposals as a way Alaska can reward the entrepreneurship of these creative chum trollers who are rising to the challenge to harvest their share of SE enhanced salmon without disrupting the net fisheries or impacting wild stocks.

I have read that Governor Parnell wants to provide new opportunities for small Alaskan businesses and eliminate outdated regulations. Adopting these proposals does both. The regulations prohibiting trolling near Juneau were designed to protect wild stocks and share Coho and Chinook. They are outdated by the advent of chum salmon hatchery production and the ability of trollers to harvest chums with very little by-catch.

Sincerely,



Stephen Rhoads
F/V Equity

Board Support Section, ADFG
PO Box 115526
Juneau, AK 99811-5526

February 8, 2012

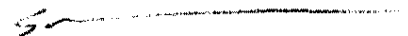
Dear Chairman Johnstone and Members of the Board,

I oppose proposal number 212, the reallocation of rockfish from the commercial sector to the charter sector. I feel that this proposal would set a dangerous management precedent. This proposal would punish commercial harvesters for adhering to board set allocations and reward the charter sector for ignoring and over harvesting.

In 2006 the Board of Fish challenged all sectors to reduce their own rockfish catch to stay within allocation. The commercial sector has taken the boards challenge seriously and worked to reduce our rockfish bycatch. I participate in the Alaska Longline Fishermen's Association's Fisheries Conservation Network. This program organizes longliners to work together with the best available technology to reduce unwanted bycatch. Participants have successfully reduced their bycatch by 20%.

The commercial longline bycatch has been below allocation and allowed a directed commercial fishery for yelloweye in some Southeast areas in the past few years. These openings represent appropriate sector accountability. It rewards the commercial fleet for reducing bycatch with additional opportunity. Proposal 212 would penalize the sector working within management constraints and reward a sector that regularly exceeds the allocation set the State of Alaska. I do not see why this could be considered a reasonable action for fisheries that are constitutionally mandated to be managed sustainably. The rationale behind this proposal should not be accepted as appropriate management of Alaska's fishery resources.

I urge the board to oppose Proposal 212. This proposal is a reallocation of resources to a group that has failed to live within management goals. I also encourage the Board to foster cooperation from all sectors to remain within their allocations.



Stephen Rhoads



Representative Beth Kerttula

House Minority Leader

January 12, 2012

Alaska Board of Fish
Attn: Shannon Stone
PO Box 11526
Juneau, AK 99711

Re: Proposal #247

Ms. Stone:

I am writing in support of Proposal #247 that calls for the development of a management plan to protect and enhance a roadside sport fishery in Juneau. There are many citizens of Juneau who do not have the use of a boat and will greatly benefit from a vital roadside fishery. Being able to access fishing locations by bicycle or car allows a greater range of adults and children to participate in the sport fishery.

Fish & Game employees and the local 4-H as well as community volunteers have done a wonderful job creating a program to teach Juneau youth the finer points of sport fishing. It would be good to have even more locations in Juneau where they could practice their skills. The development of a management plan is one way to ensure that this valuable work continues and future generations of sport fishermen and women are spawned.

Sincerely,

A handwritten signature in cursive script that reads "Beth Kerttula".

Representative Beth Kerttula

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An Economic Overview of the Sitka Roe Herring Fishery

by

Gunnar Knapp
Professor of Economics
Institute of Social and Economic Research
University of Alaska Anchorage
3211 Providence Drive
Anchorage, Alaska 99508
Gunnar.Knapp@uaa.alaska.edu
907-786-7717

Prepared for
Alaska Board of Fisheries

February 9, 2012

Introduction

As a fisheries economist at the University of Alaska Anchorage Institute of Social and Economic Research (ISER), I have been studying economic impacts of Alaska fisheries for many years.

At its 2012 Southeast and Yakutat Finfish meeting (February 24-March 4, 2012), the Board of Fisheries will consider several proposals which could affect commercial harvest volumes in the Sitka Sac Roe herring fishery. The Southeast Herring Conservation Alliance (SHCA) contacted me in January to ask if I could provide the Board of Fisheries with economic information about the fishery.

This paper provides a brief economic overview of the Sitka roe herring commercial fishery.

I am currently working on estimates of economic impacts of the fishery on the Alaska economy. I was not able to complete those estimates prior to the February 9 deadline for submission of comments to the Board, but I will complete them and have them available prior to the Board meeting.

It is clear that the economic impacts of the fishery are very significant. Importantly, they extend beyond the impacts of herring fishing to those of herring tendering and processing, which generate hundreds of jobs and millions of dollars of income in southeast Alaska communities.

I have not studied the proposals before the Board and am not taking any position with regard to them.

Table 1 summarizes economic data for the Sitka Roe Herring Fishery collected by the Alaska Department of Fish and Game for the years 2005-2010. Except for the harvest volume, no data for the 2011 fishery were available when I prepared this paper.

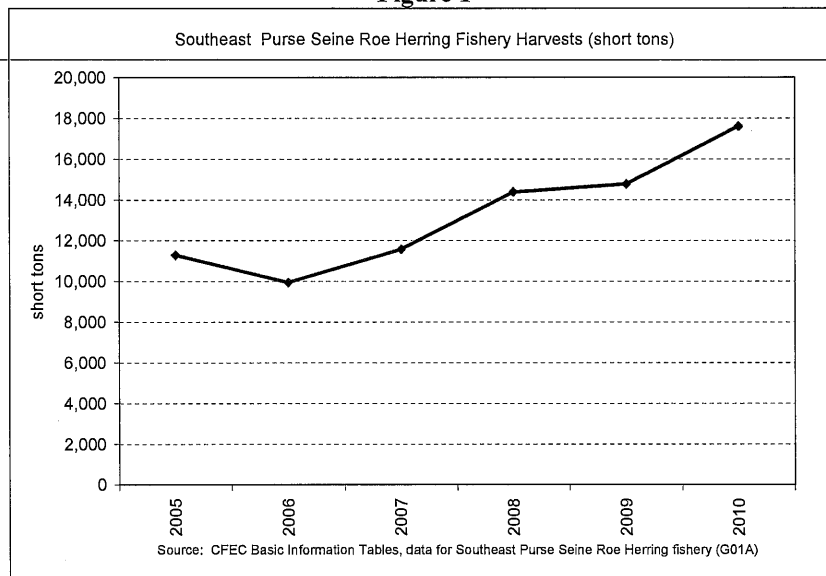
Table 1
Selected Data for the Sitka Roe Herring Fishery, 2005-2010

	Units	Source	2005	2006	2007	2008	2009	2010
ADF&G Preliminary Harvest Data								
Harvest volume	short tons	a	11,425	9,967	11,571	14,386	14,775	17,874
Roe percent	%	a	11.4%	10.5%	11.4%	11.6%	11.8%	12.5%
Preliminary estimate of ex-vessel price	\$ / short ton	a	\$510	\$200	\$475	\$750	\$720	\$730
CFEC Basic Information Tables data								
Harvest volume	short tons	b	11,288	9,942	11,571	14,386	14,776	17,602
Average ex-vessel price	\$ / short ton	b	\$542	\$266	\$492	\$746	\$858	\$690
Ex-vessel value	\$ 000	b	\$6,118	\$2,645	\$5,693	\$10,732	\$12,678	\$12,146
Earned by Alaska resident permit holders	\$ 000	b	\$4,280	\$1,899	\$4,094	\$8,689	\$9,394	\$9,377
Earned by non-Alaska resident permit holders	\$ 000	b	\$1,838	\$745	\$1,599	\$2,043	\$3,284	\$2,768
Alaska resident share	%	*	70%	72%	72%	81%	74%	77%
Permits fished	number	b	51	50	50	47	50	49
Alaska residents	number	b	36	36	36	34	36	35
Non-Alaska residents	number	b	15	14	14	13	14	14
Alaska resident share	%	*	71%	72%	72%	72%	72%	71%
Average earnings per permit fished	\$	b	\$119,958	\$52,894	\$113,861	\$228,344	\$253,555	\$247,871
Alaska residents	\$	b	\$118,876	\$52,755	\$113,718	\$255,568	\$260,946	\$267,919
Non-Alaska residents	\$	b	\$122,553	\$53,249	\$114,229	\$157,142	\$234,548	\$197,750
ADF&G COAR data								
Production volume	short tons	c	10,544	9,121	10,519	10,062	11,528	15,748
First wholesale value	\$ 000	c	\$13,638	\$7,879	\$12,413	\$13,100	\$19,391	\$18,826
Average first wholesale price	\$ / short ton	c	\$1293	\$864	\$1180	\$1302	\$1682	\$1195
Average processor margin (first wholesale price - ex-vessel price)	\$ / short ton	*	\$751	\$598	\$688	\$556	\$824	\$505

Sources: (a) Preliminary data for the Sitka Sound herring fishery posted on the Alaska Department of Fish and Game website. The website address for 2010 data is: http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/10herring_catch.pdf. Websites for earlier years are the same except with different numbers for the years; (b) Commercial Fisheries Entry Commission data for the Southeast Purse Seine Roe Herring Fishery (G01A), available on the CFEC website at <http://www.cfec.state.ak.us/bit/MNUHERR.htm>. Volume data were converted from pounds to short tons (1 short ton = 2000 pounds); (c) Alaska Department of Fish and Game Commercial Operator Annual Report (COAR) data for Southeast Alaska Frozen Sac Roe Herring Production, provided by Shellene Hutter of ADF&G, November 16, 2011; * Calculated from other data in the table.

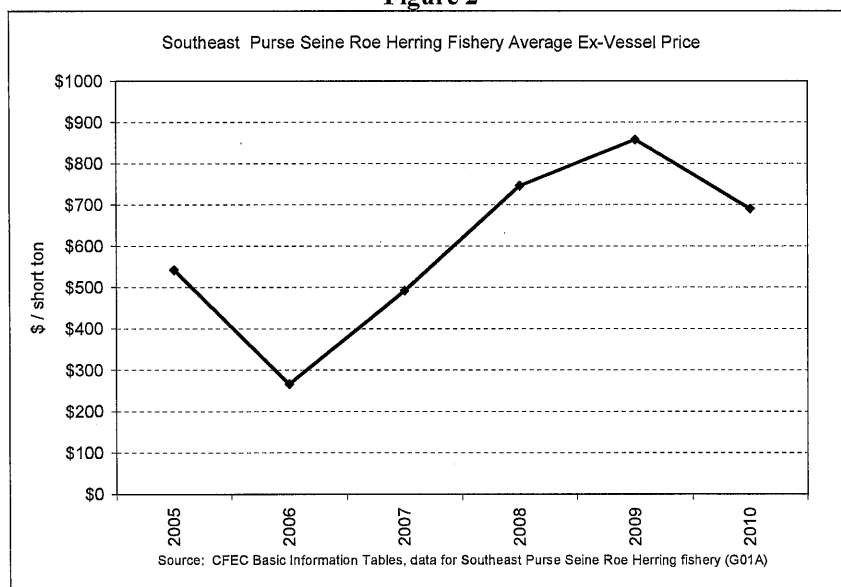
Harvests in the Sitka roe herring fishery increased significantly from 10,000 short tons in 2006 to almost 18,000 short tons in 2010 (Figure 1). Harvests in 2011 were 19,429 short tons.¹

Figure 1



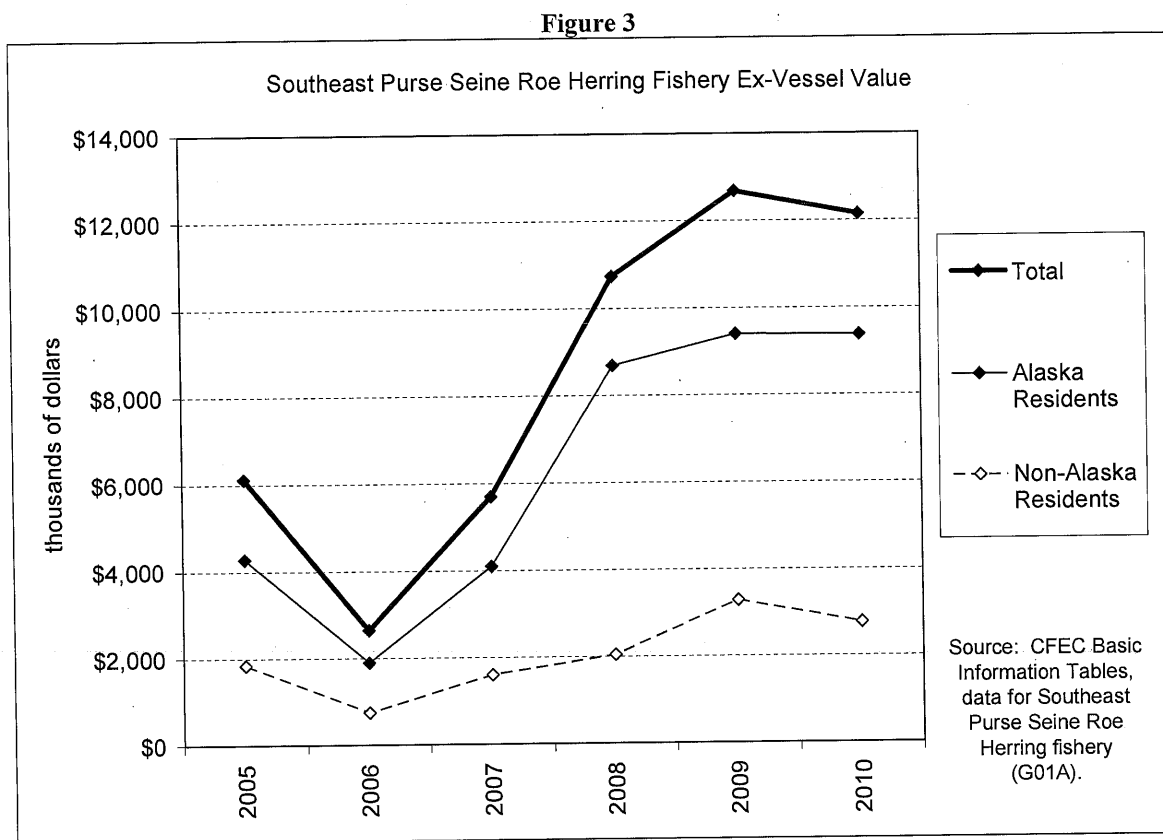
The average ex-vessel price per short ton increased dramatically from \$266 in 2006 to \$858 in 2009 and fell to \$690 in 2010 (Figure 2). Note that this is a weighted average of the price paid for all herring in the fishery. The weighted average price is higher than the base price paid to fishermen for 10% roe herring, which is typically adjusted upward as roe content increases above 10%. No data were available yet for the average price paid in 2011. Anecdotal evidence suggests that the 2011 base price was in the range of \$150-\$200/ton for 10% roe herring—much lower than in 2010 and likely resulting in an average price similar to that paid in 2006.

Figure 2



¹ David Gordon, Alaska Department of Fish and Game (personal communication, February 6, 2012).

The combined effect of the increase in harvest volumes and increase in ex-vessel prices was a dramatic increase in the ex-vessel value of the fishery from \$2.6 million in 2005 to \$12.7 million in 2009 and \$12.1 million in 2010 (Figure 3). No data are available for the 2011 ex-vessel value, although it was certainly much lower than in 2010 because prices were much lower.

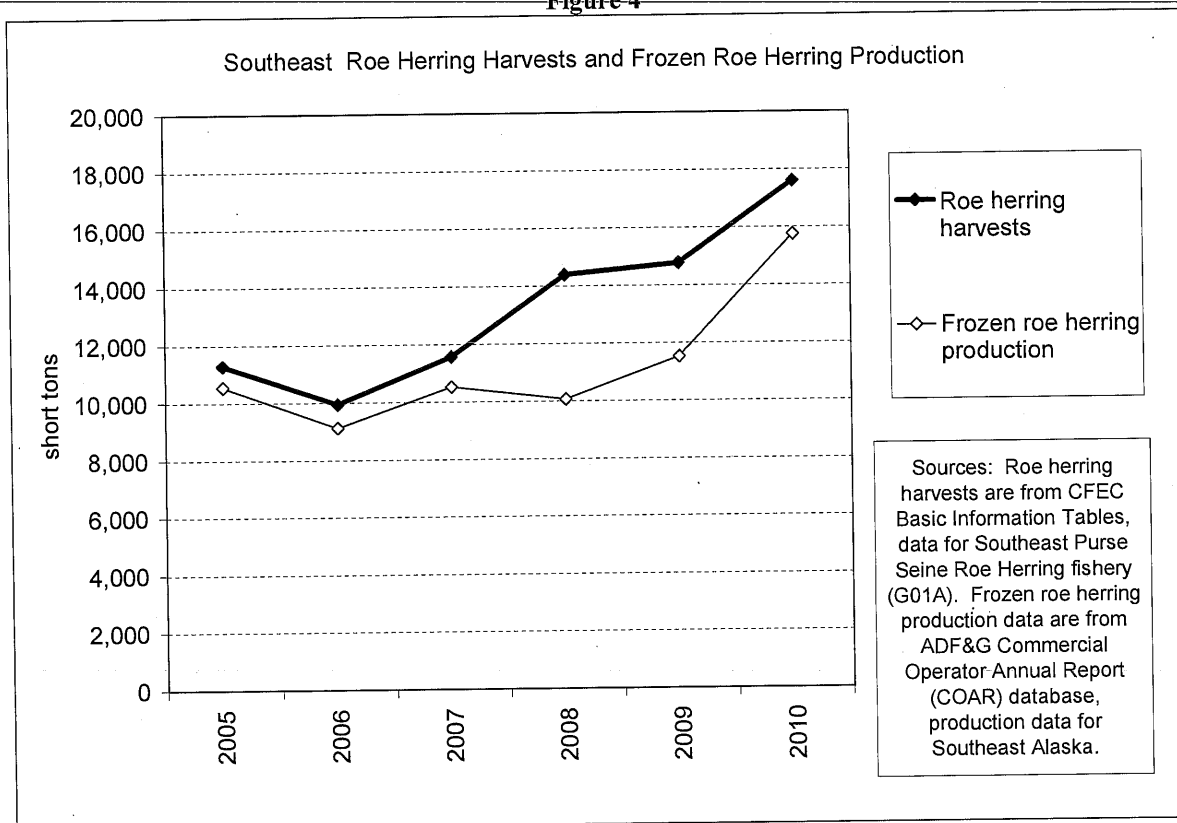


About three-quarters of Southeast purse seine roe herring permits are held by Alaska residents, and Alaska resident permit holders account for about three-quarters of the ex-vessel value (Figure 3).

Most of the herring harvested in the Sitka fishery is processed in Southeast Alaska in the communities of Sitka, Petersburg and Ketchikan, although some is tendered to processing plants in Canada. Almost all of the harvest is frozen in the round and exported to Japan, where it is used to make *kamaboko*, or salted herring roe, a traditional Japanese food.

A small share of Sitka herring harvests are tendered to Canada for processing in Canadian processing plants. Exports to Canada are probably the main reason why the total reported volume of Southeast Alaska frozen roe herring production is slightly lower than the reported volume of harvests (Figure 4).

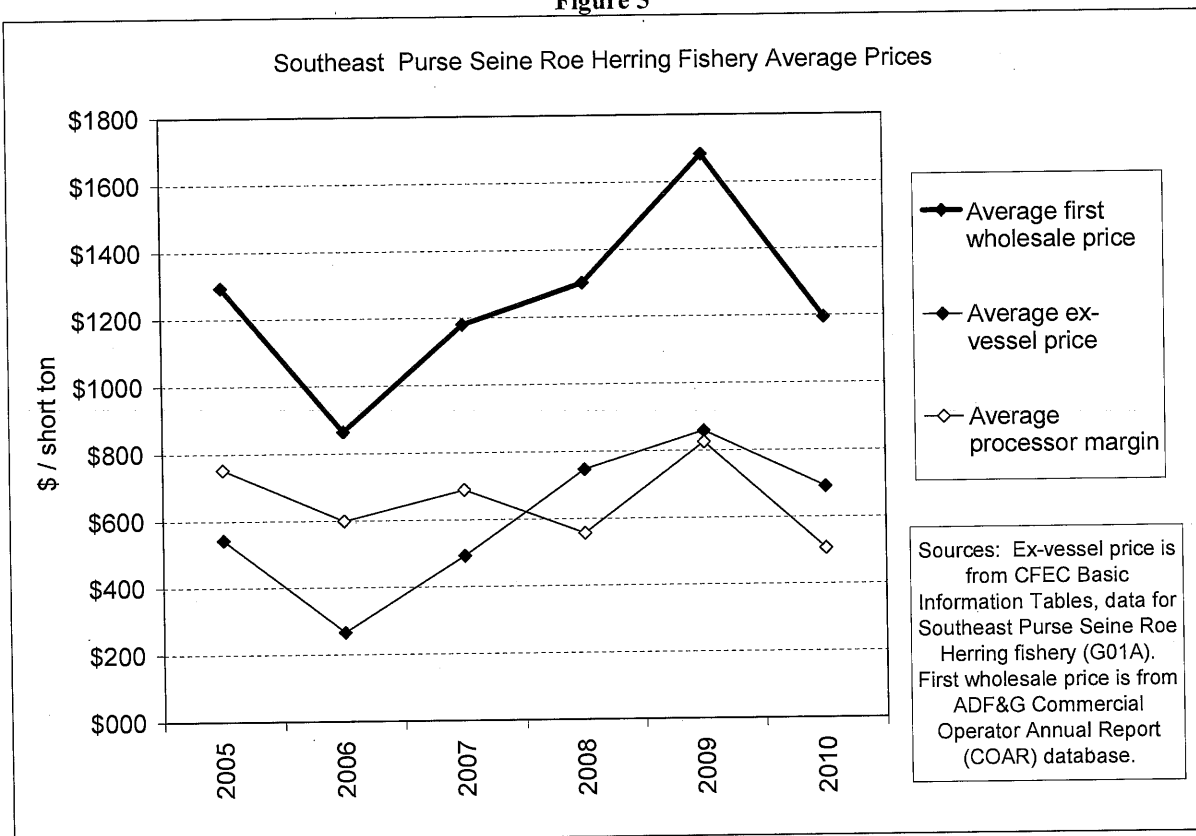
Figure 4



Trends in first wholesale prices for frozen roe herring closely track trends in average ex-vessel prices. Higher wholesale prices are reflected in higher ex-vessel prices paid to fishermen; lower wholesale prices are reflected in lower ex-vessel prices paid to fishermen (Figure 5).

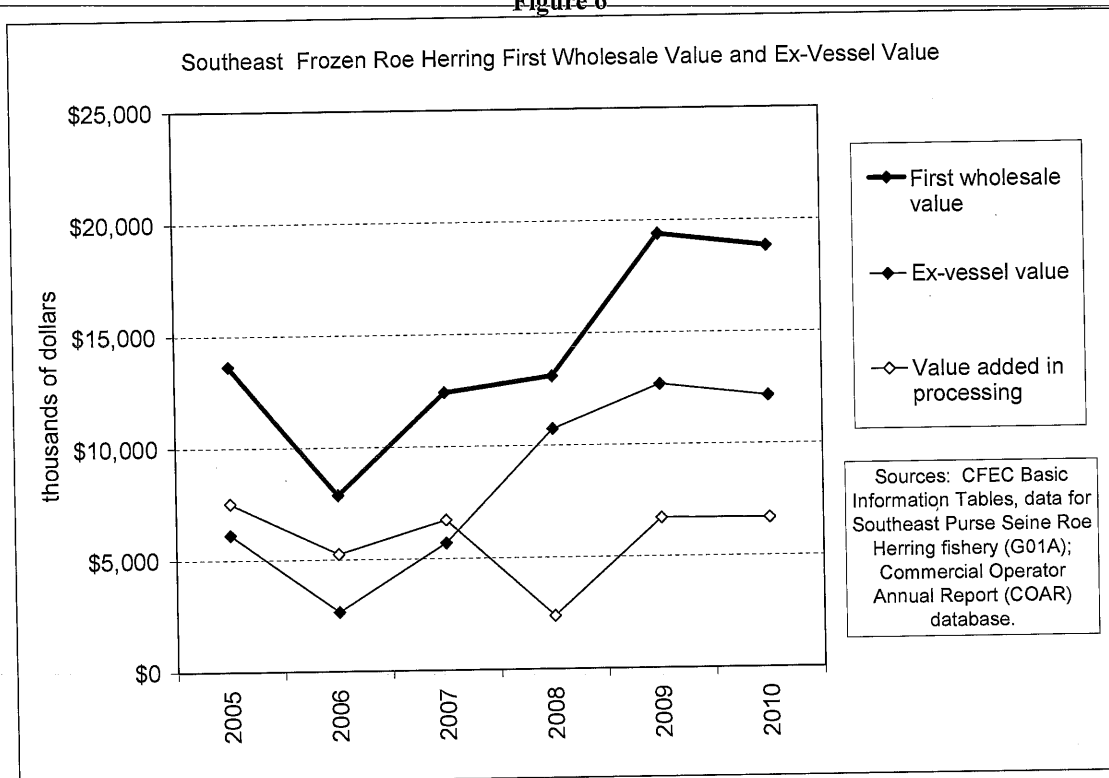
The “average processor margin”—the difference between the average first wholesale price and the average ex-vessel price—is a measure of the increase in the value of the herring during processing. The average processor margin is equal to the sum of the average cost of tendering and processing (not including fish purchases) plus average processor profits. Historically the average processor margin has fluctuated relatively less than (or been relatively more stable than) average ex-vessel prices. Between 2005 and 2011, the average processor margin ranged between a low of \$505/short ton in 2010 and a high of \$824/short ton in 2009.

Figure 5



The total first wholesale value of Southeast Alaska frozen roe herring production rose from \$7.9 million in 2006 to \$19.4 million in 2009 and \$18.8 million in 2010 (Figure 6). The 2010 first wholesale value consisted of \$12.1 million in ex-vessel value and an addition \$6.7 million value added in processing.

Figure 6





Board Support Section, ADFG
P.O. Box 115526
Juneau, Ak 99811

2/9/2012

9 pgs. Attached

Fax: 907 465-6094

RE: Proposals 216, 252, 270

1. Oppose Proposal 216

I've been a commercial fisherman for over 30 years and have fished out of Chatham Strait since 1975 and Clarence Strait since about 1990. I was awarded a limited entry sablefish permit in Chatham Straits and purchased a Clarence Strait sablefish permit. This resource has been historically fully utilized by commercial fishers. My experience in the area has allowed me the privilege to see the ups and downs of the resource. Current assessment models are indicating a downward trend in the fishery since 2002. (see attached memo and graph from Kristen Green, Groundfish Project Leader 7/14/11). Given the status of the resource and that the commercial sector is expecting reduced catch limits it is unreasonable to remove annual limits for non-resident anglers.

The Author of this proposal claims an annual limit for the non-resident is unnecessary and based on inflated harvest projections. I counter this claim in that annual limits for any fisher or sector, resident or not, should be necessary in order to conserve the resource and control underground marketing of non-commercially caught and processed product. Not doing so is being irresponsible to the resource, and the commercial sector whose job is to supply commercial markets, not outfitters through excess retention by any one angler.

Regarding inflated harvest projections, please see attached evidences of catch by only two lodges out of Juneau in 2011 where average catch of sablefish per week, per lodge is over 100 fish or 800 lbs given a 7.5 lb round weight average per fish. This information was ascertained from actual photos posted on the outfitter's websites, some of which are attached. Given an 18 week season it is likely that over 30,000 lbs has likely been harvested in the 2011 sport season by only two of the lodges observed. See attached Table "Evidence of Daily Sport Catch of Sablefish - 2011".

The Author also suggested that no one was likely to suffer from this proposal. For reasons listed above the author fell short of acknowledging the limits on the resource and the commercial fishers historical participation in fully utilizing this resource.

P.O. Box 3302 • Seward, Alaska 99664

Office (907) 224-5584 • Fax (907) 224-5572 • kruzof@ak.net

2. Support Proposal 252

I support allowing the use of electrical reels for dis-abled anglers only. Use of electric reels begins to re-define a true sport angler to a mechanical one, which could eventually lead into an industrial harvester. Furthermore it allows for easier harvest of very deep water species like sablefish that has not been typically taken as a sport harvested item.

2. Support Proposal 270

I concur with ALFA's comments on this proposal. I support improving the reporting and tracking of sablefish taken by subsistence and personal use harvesters. Existing regulations allow unlimited subsistence harvest of sablefish, with no restriction on gear or catch. Miles of longline are allowed and used. Some "subsistence" harvesters have landed thousands of pounds, without knowledge of managers. Tracking these removals is critical, especially during a time of declining stocks. I support either the Board implementing a record keeping system and annual limits for subsistence and personal use sablefish, or the Board vesting that authority in the department. If annual limits are assigned, they should be reasonably designed to allow harvesters to meet family food needs without wonton waste.

Sincerely,
F/V Kruzof


Jim Hubbard, Operator

Figures

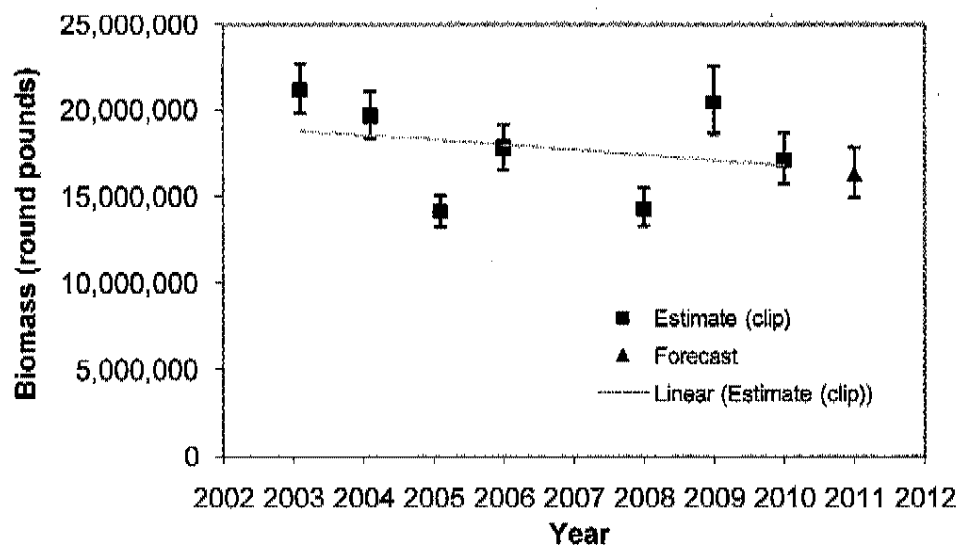


Figure 1. Petersen estimates of exploitable biomass with the 2011 forecast, 90% confidence intervals, and linearized trend line.

Evidence of Daily Sport Catch of Sablefish-- 2011									
Source-- On Line Photos from 2 Lodges out Juneau - Random Weekly sample									
www.shelterlodge.com				www.anchorpointlodge.com					
Shelter Lodge:				Anchor Point Lodge:				Summary:	
No. Fish Lbs/fish Total Lbs				No. Fish Lbs/fish Total Lbs				Both Lodges:	
Week Of:								<u>No Fish</u>	<u>Total lbs</u>
June 6th				76	7.5	570			
June 11th				106	7.5	795			
June 30th				132	7.5	990			
July 17th	121	7.5	907.5						
July 24th	89	7.5	667.5						
July 31st	125	7.5	937.5						
Aug 22nd	107	7.5	802.5						
Aug 29th	138	7.5	1035						
Totals	580		4350	314		2355		894	6705
Avrg fish or lbs/week:	116		870	105		785			
Potential Average Fish/week/Lodge:								112	838
Potential catch for 18 week season per lodge:								2012	15,086
Total Potential Annual Catch for these Two Lodges only:									30,172.50



ANCHOR POINT LODGE

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Photo Albums: 2011 Season Photo

Week of June 30

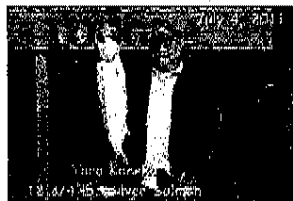
week of June 30th

37 images

[Back to parent gallery](#)

$$\text{July 2} = 16 + 17 + 16 + 16 + \cancel{16} = 65$$

$$\text{July 1} = 16 + 16 + 16 + 19 = 67$$

 132 fish.

<http://anchorpointlodge.com/gallery/2011/6-30-11/70/>

2/9/2012

2/9/2012

<http://anchorpointlodges.com/gallery/2011/6-30-11/70/>



1/2



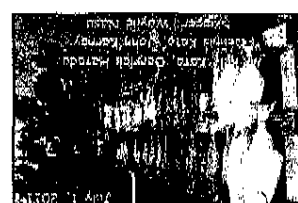
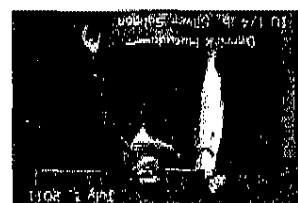
1/2

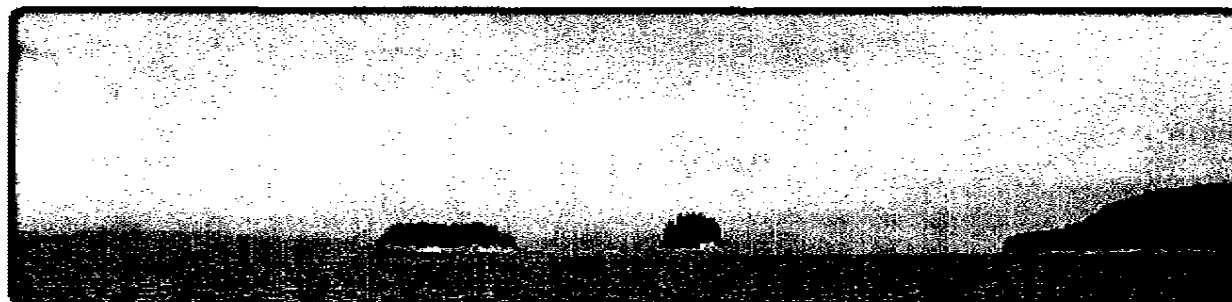


2/9/2012

<http://anchorpointlodge.com/gallery/2011/6-30-11/70/>

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Click Here for August 23 Group Photos

Posted on August 25, 2011 by Jackie

[\[Show as slideshow\]](#)



<http://www.shelterlodge.com/archives/346>

Week of Aug. 21, 2011

$$\frac{8}{24} = 16 + 11 + 5 + 16 = 48$$

$$\frac{8}{25} = 16 + 16 + 16 + 9 = 57$$

$$\frac{8}{26} = 6 + 9 + 8 = 23$$

128 fish

2/9/2012



← Click Rest in
here for Peace
August Kiska -
18 August
Group 25,
Photos 2011 →

<http://www.shelterlodge.com/archives/346>

2/9/2012

ATTN: BOF COMMENTS
Board Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99801-5526
Fax: 907 465 6094

Dear BOF and Board Supports

I am writing to you regarding two proposals you will be reviewing this season. One concerning increasing chum access for trollers in Southeast (325), and one affecting the entire troll fleet (312).

I have been trolling my whole life, first with my family, and for the last eleven years running my own boat. I bought into the fishery during a low point for the salmon industry as a whole, and since that time have seen effort increasing steadily as salmon prices have improved and the troll fishery has become more profitable. One aspect of the fishery that has done as much as anything to improve the fortunes of the troll fleet has been the rise in exvessel prices for chum salmon, and the maturing of the targeted chum salmon troll fisheries. This has resulted in a continual increase in effort in all of the chum fishery areas, with the Icy Straits fishery seeing possibly the most rapid rise in effort in the last three years.

Proposal 325 works to expand hatchery chum access for trollers in Icy Straits which, in addition to addressing the historical disparity between our enhancement tax contributions and hatchery fish harvests, would help to spread out effort, both within the Icy Straits chum fishery, and between chum and chinook fishing during the first chinook opener in early July. This would benefit the troll fleet as a whole by allowing the fleet more fishing time, be it because of the increased harvest areas proposed by 325, or because of the reduced effort on chinook that is likely to be seen as a result of increased chum opportunities.

In addition to voicing my support for proposal 325, I would like to speak against proposal 312, which would unnecessarily hamper ADF&G's ability to manage the troll fishery by requiring a 10 day closure, regardless of the Departments stance on the issue. This proposal would seem to adversely affect both the troll fleet and management, while offering no statistically proven benefit to inside waters net fishermen.

I would like to reiterate the importance of the targeted chum fishery to my business, and to the troll fleet as a whole. While returns, as well as exvessel prices, will rise and fall, the options opened up by this fishery make for a more robust troll sector. Proposal 325 allows for more troll access to hatchery raised chum, and should be adopted for that reason.

Thank you for your time,

Matt Lawrie
2015 Cascade Creek Road
Sitka, AK 99835

Lofoten Fish



Wild Alaska Salmon

P.O. Box 2028, Petersburg, Alaska 99833
907-772-2680; 360-201-7287 (cell)
www.eatalaskasalmon.com
cynthia@eatalaskasalmon.com

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FEB 06 2012
BOARDS

February 1, 2012

Board of Fisheries, Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Re: Southeast Commercial Finfish Proposal #292 (Change gillnet fishery openings from noon Sunday to 8:00 AM Monday)

Dear Chairman Johnstone and Board of Fisheries Members:

Proposal 292 requests that area gillnet openings are changed to start on Mondays at 8am, or alternatively Mondays at noon, instead of Sundays at noon. We gillnet for salmon in Districts 6 and 8 and have been direct marketing since 1999. We oppose this change because the switch would reduce sales for us and other small processors, as well as damage the entire industry's past and future fresh salmon marketing efforts.

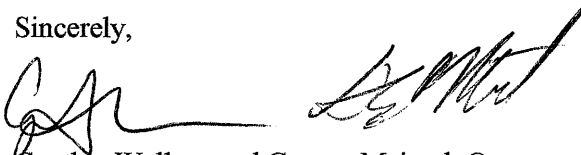
The fresh Alaska salmon market is very strong. Much of this is due to the persistent marketing efforts of ASMI (Alaska Seafood Marketing Institute), large processors and direct marketers. Getting fresh fish to buyers, such as restaurants, in time for weekend sales is critical to sustain the demand for fresh Alaska salmon.

If the Board of Fisheries accepts proposal 292, and gillnet openings begin on Monday instead of Sunday, the day to ship fresh salmon to the lower 48 would advance one extra day in the week. The new proposed schedule will result in the fresh product arriving on Friday afternoon, which is too late in the week for restaurants to have the salmon ready for their weekend sales. If this becomes the case, our business, and other small processors, would lose most or all of our fresh salmon sales. Sadly, the restaurants we sell too would be forced to find fresh fish elsewhere to meet their needs. Losing these sales will not only have a significant impact on our business, it will negatively affect other processors, businesses and organizations that work hard to build and sustain the demand for Alaskan salmon.

To allow direct marketers and small processors to meet weekend sales needs in the lower 48, and to continue supporting our state's admirable marketing efforts, please oppose proposal 292 and keep the gillnet fishing schedule as is.

We value the Board of Fisheries' public process and appreciate being able to submit this letter in our absence. Thank you.

Sincerely,



Cynthia Wallesz and George Meintel, Owners

February 9, 2012

Alaska Board of Fisheries
c/o Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115826
Juneau, AK 99811

Dear Board of Fisheries Members,

I am writing in regards to the Southeast and Yakutat Finfish Board of Fisheries Meeting.

PROPOSAL 285 - Repeal 58 ft. limit in S.E. Salmon purse seine fishery
PROPOSAL 286 - Increase length limit for S.E. salmon seine vessel to 75 ft.

I am against Proposal 285 and Proposal 286. The persons that are for these proposals do not have good enough reasons to remove the long-standing 58-foot limit, which for many years has been the legal limitation for every permit holder purchasing or constructing a vessel for this fishery. The fishing fleet has been developed on the standard of the 58-foot limit.

PROPOSAL 288 - Allow seine vessel to transport two seine nets

I am against Proposal 288. Many permit owners with a long history of fishing in this fishery do not own vessels large enough to carry two seine nets. Therefore, this proposal creates an unfair advantage for those with larger vessels.

PROPOSAL 342 - Establish a registration fishery for the Hidden Falls THA to replace the cost recovery harvest with tax assessment.

I am for Proposal 342. Proposal 342 will allow more fishing time, which will result in allowing the seine fleet to spread out during midweek openings therefore creating a more orderly fishery.

Sincerely Yours,



Edward Manning

Owner & Operator F/V Sound Star

Michael J Mayo

Feb 8, 2012

2808 Sawmill Creek Rd

Sitka, AK 99835

907-738-1698, 907-747-8788, fax 907-747-9313

michaeljmayo@hotmail.com

ATTN: BOF COMMENTS

Board Support Section

Alaska Dept of Fish And Game

PO Box 115526

Juneau, AK 99811-5526

PROPOSAL 216

I oppose proposal 216 because it puts no annual limit on fishermen taking fish out of the state and is against conservation measures taken by the state, fishermen, and fishery groups to bring back the Sablefish in Northern Southeast Alaska. I have fished the Northern Southeast Sablefish fishery [Chatham] since 1977. Sablefish is a valuable economic resource to the fishermen who fish there and who have limited entry permits. Many Alaskans have purchased limited entry permits to fish the Chatham fishery. We have seen our production cut 82% since 1993 [5,795,974/1993 to 1,063,000/2101]. We have taken severe cuts to our harvest. Most of us, the Chatham limited entry permit holders, asked to have the harvest lowered when we saw a drop in the stock of Sablefish.

Without a annual limit on nonresident sport fishermen we will see even further cuts. This will hurt us economically. We will lose money because there will be less fish to catch. The Chatham fishery limited entry permit holders are predominately Alaskan [76%] and almost all of the fish is processed in the state.

This proposal would put outside [non resident] fishermen ahead of local Alaskan [resident] fishermen. For those of us who live here this would be a hardship.

Any increase in the nonresident sport fish quota will make it harder for those who have purchased Alaska Chatham limited entry permits to make their payments.

The State of Alaska Dept of Fish & Game has gone to great lengths to get under control the Northern Southeast Sablefish fishery. It has just finalizing the Chatham Straits total limited entry permit holders to insure economic stability to the fishermen and to help with the conservation of this resource. By not having a total annual harvest limit by sport fishermen it would undermine these efforts.

Another solution is to limit the TOTAL harvest of sablefish by out of state fishermen. Limit it to the sport sablefish harvest of 2011. As the fishery increases it can be raised proportionally to the increase in the biomass of sablefish. This would put the out of state fishermen in the same boat as other fishermen, the F/V Conservation. It is time to stop penalizing conservation minded Alaskan fishermen and fishery groups. An annual limit for the out of state sport sablefish fishermen is in the best interests of conservation of the sablefish stock.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Mayo", written in a cursive style.

Michael J. Mayo

Michael J Mayo

Feb 9, 2012

2808 Sawmill Creek Rd

Sitka, AK 99835

907-738-1698, 907-747-8788, fax 907-747-9313

michaeljmayo@hotmail.com

ATTN: BOF COMMENTS

Board Support Section

Alaska Dept of Fish And Game

PO Box 115526

Juneau, AK 99811-5526

Proposal 270

I am in favor of this proposal. the Dept of fish and Game needs to know how many sablefish are being taken out of Northern Southeast inside waters. This is in the best interests of conservation and management. They cannot manage the fishery properly without this knowledge. However, I think this proposal should be expanded to put an annual limit on the subsistence users catch. I have heard rumors [I am trying to get this substantiated now] that one boat landed 12,000 lbs of subsistence sablefish into Petersburg this summer. Without an annual limit absurdities like this can/could/will happen. There needs to be an annual limit of subsistence caught sablefish. My family eats a lot of black cod. Maybe 12 to 20 would be a good limit.

I have fished the Northern Southeast Sablefish fishery since 1977.

Sincerely,

Michael J Mayo



2/09/2012

Attn: BOF Comments

Dear Board of Fish,

This letter is in regards to Proposal 216 and 270.

Comments on Proposal 216:


I am a Chatham permit holder and have thirty-two (32) years invested in the fishery. I'm really fairly ignorant of when the Charter Industry started fishing for Blackcod. The first I heard of it was last year. However I am fairly informed about the participation and historic lack of real and effective regulations involving the halibut fishery for the charter fleet, as all of you are also. The current regulations on charter blackcod appear to be much more solid and definitive than they were for halibut. Eliminating the annual limit for black cod is going backwards. I'm not sure why it's even being considered. Eight trophy size blackcod (I have seen pictures of Charter caught blackcod that look to be about ten pounds or so) have a monetary value of about \$720 to the commercial fishers, using 2011 ex-vessel prices. Putting up 80 pounds of a sport caught species is plenty. **Who is likely to suffer?** The commercial permit holders who have been historically fishing Chatham and provide a product for the whole market, not just a select few. If any changes are made it should be to decrease amount of fish allowed. The permitted quota has been decreasing since 1993 and the effort from the Charter Fleet is going to grow as more charter boats start targeting blackcod. **I vote NO on this one.**

Comments on Proposal 270:

In this day and age all subsistence use of anything should be permitted and recorded. **I vote a big Yes on Proposal 270.** P.S . I am also a subsistence user.

Thank you for your time and attention and also your dedication serving on the board.

Sincerely,


Sheryl Mayo

February 6, 2012

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

RECEIVED
FEB 02 2012
BOARDS

Re: Proposals 284 and 320

Dear Mr. Johnstone and Board Members:

I am a commercial salmon troller and longliner who lives and fishes out of Juneau. I support the Alaska Trollers Association (ATA) proposals 284 and 320, on management of the directed troll fishery for Taku River Chinook in District 11.

Trollers had a long history of fishing in District 11 and averaged 35% of the harvest from statehood until the early 70's when the directed fishery was closed for conservation reasons. All gear groups shared the pain of rebuilding and should now share adequate harvest opportunities.

In the fall of 2005 the Board of Fisheries formed a Task Force to develop management plans for gillnetters, trollers, and anglers in District 11. I served on the District 11 task force. Both groups did some good work and found common ground on many things. Proposals 284 and 320 address the remaining issues, which time has proven are important to resolve, in order to give trollers a fair shot at Taku River kings.

Trollers considered asking for a specific allocation, but that would be hard to manage and disruptive for all users. The best and only way for trollers to get a fair share is with generous time and area. Trollers would like to see more time and area to access these Chinook. You will see that modifications being requested by ATA and local trollers are relatively small and attempt to keep all users in mind.

Proposal 284 would give trollers more time. Linking us to the same number of days allowed for gillnet openings makes no sense, as our success rates in terminal areas is very different. Troll gear is nowhere as effective as gillnet, as the data shows.

In District 11, trollers averaged 16 Chinook in 2005 and 2006. That's way less than 1% of the catch. During that same time period the gillnet fleet averaged over 15,000 fish. It's important to consider that even if trollers had fished 7 days a week, ADFG estimates only slight increases in troll harvest would have occurred.

ATA has requested 5 days a week in 11-A, and 7 days in 11-B, whenever the gillnetters are open for kings. The reason for the difference has to do with the conduct of local fisheries and the migration of fish.

Area 11-B is more distant from town, so there is less sport effort there and trolling would have little impact anglers.

Area 11-A is closer to town, where anglers are fishing for Taku kings that time of year. Trollers have agreed not to fish weekends in 11-A, which would allow the sport fishery full access. Taku kings migrate through area 11-A towards the river, so a few more would pass to the gillnet fishery as well.

Trollers have also agreed not to fish either area on Memorial Day.

Proposal 320 would make a line adjustment in 11-A. The line right now is drawn from Piling Point to Middle Point. I support a line from Piling Point to Outer Point, because it would square off the area and give trollers a more natural fishing line. This would make for a more orderly fishery, because it follows the contour rather than an arbitrary line. The problem with the Middle Point line is that it's at an angle, so you bottleneck with any boat – sport or commercial - fishing the beach on the back side of Douglas Island. The Outer Point line would relieve that potential conflict.

These concepts are broadly supported by trollers who fish District 11. A lot of thought went into developing a plan that would fit the unique features of this area, minimize conflicts between user groups and secure adequate data for future management decisions. Trollers have been very supportive of other gear groups' attempts to secure reasonable fishing time and effort. Our communities will benefit as all three gear types harvest these fish. It is my hope that you will be favorable to the troll position on these very important fisheries.

Best regards,

Ken McGee
F/V North Star
2390 Engineers Cutoff Rd.
Juneau, AK 99801

Merritt 1

Written testimony to Board of Fisheries concerning proposals being considered in the Southeast Alaska fin fish meeting February 24, 2012.

There are several proposals that attempt to solve the allocation imbalance between the troll and gillnet fisheries.

We all agreed to the allocation plan created in 1994. What the trollers didn't agree to is being short changed 7 to 10 % every single year. The last five years the troll fleet has averaged 19% when its target allocation has been 27-32, and the gillnets have averaged 39% and their target allocation is 24-29.

¹ enhanced allocation estimates presented April 6 2011 to the rpt. Re ____

The reality is the over harvesters are going to have to give to make this right. Cooperation is rare, especially when it involves this very aggressive gillnet fleet.

The troll fleet needs your help and it is going to take the adoption of proposals that actually give this fleet a chance to gain on this issue.

To solve this, it is going to take expanded troll harvest areas and additional fishing time for the trollers. Proposals 311, 314, 317 and 326 are the types of proposals that need to be adopted.

311 will allow the troll fleet to harvest hatchery coho on June first rather than the 15th. The SSRAA's snow pass coho, is a summer coho and different from the typical fall coho. It returns in the first part of June and is a large high quality fish by the end of May.

Gillnetters can keep these fish in May, yet trollers cannot keep them until June 15th. Last year more than 50,000 of SSRAA's summer coho were caught by the drift fleet, and only 7,500 were caught by trollers. ²(sraa website.)

311 adjusts the spring harvesting of hatchery coho. Proposals 314 and 317 extend fishing time on the fall end. They are specific to areas of high hatchery coho abundance. These areas are typically closed to trolling on the 20th of September and the gillnetters are allowed to continue fishing. These proposals allow trollers the needed additional fishing time to harvest hatchery coho and keep pace with the gillnetters.

¹
²

Merritt 2

I support proposal 325. 325 changes the management of some hatchery access areas to hatchery chum rather than hatchery king salmon management. The areas originally in this proposal that were of higher hatchery king percentages were amended out thoughtfully. There was no need to jeopardized those more valuable hatchery king areas by putting them under a chum management regime.

For the most part 325 does not involve a lot of new area and there isn't new fishing time involved in it. It is not surprising that it made it out of the rpt process. It does manage the areas for what they most valuable for to the troll fleet. Allowing the trollers to get the most bang for their buck so to speak.

However 326, the new troll chum harvest area proposal, did not make it out of the rpt process. 326 involves additional troll area and potential harvest of hatchery chums. Due to lack of cooperation of the gillnet faction on the rpt it did not pass. It would definitely aid in solving the allocation imbalance. I ask that you pass 326, despite this of this lack of cooperation.

I submitted proposal 252, the electric reel only for the handicapped. I think it was a grievous mistake for this board to allow the electric reel for thousands of nonresident sport fisherman visiting Alaska. During the 2010 Board of Fish meeting, the electric reel proposal 298 was supported only by the Petersburg and Ketchikan AC's of this region. The electric reel is a harvesting tool not a sport fishing tool. If anything, it belongs in the personal use category where harvest is the focus and not sport fishing. I would accept an amendment to that effect if it would help passage of 252.

I oppose proposal 312. This proposal is unwarranted and factually unsubstantiated by department data. The attached data shows there is little relationship between the inside fishery harvest and the length of the closure.

The Department has done an outstanding job in meeting the Board of Fishery's suggested allocation guidelines. Since the allocation guidelines were adopted the average harvest percentages 1989 to 2010 are within 5% for all fisheries. See attached data. Considering the diversification of the troll, seine and gillnet fisheries, the development of new chum fisheries and all the environmental factors that truly effect coho harvest, the department has done an exceptional job.

2

Merritt 3

There are many factors that affect the inside fisheries harvest of coho. Least of all is probably the troll closure length. Probably the biggest culprit that affects coho movement to the inside waters is weather.

On dry hot summers cohos will wait off shore for rainy and stormy weather. Instinctually, they must know going to the creek when water levels are low will be counter productive. In these years the coho don't get to the inside waters until late August or early September. The drift net window for harvest of these fish is shorter because of that. Since these fish only move when it is storming, gillnetters are faced with weather complications in this scenario. Many of the smaller gillnetters do not tolerate windy weather and the bigger boats have trouble getting their net to fish in such weather. This is probably the biggest factor that affects the driftnet harvest of coho in Southeast Alaska.

Sincerely, Steve Merritt

merritt 4

Coho troll closures			coho catch	
Year	length	dates	gillnet %	per use/subsistence
2000	10 days	8/13---8/22	10 %	745
2001	5 days	8/13---8/17	11.4%	1071
2002	2 days	8/10---8/11	19%	1245
2003	0 days		20%	1222
2004	2 days	8/10-8/11	11.2%	1308
2005	4 days	8/10---8/13	10.4%	1183
2006	9 days	8/8-8/11, 8/23-27	14.9%	963
2007	5 days	8/11---8/15	10.4%	663
2008	5 days	8/11---8/15	17.9%	2452
2009	5 days	8/12---8/16	14.6%	1931
2010	4 days	8/11---8/14	24.8%	2278
2011	5 days	8/10---8/14	11.9%	

Hatchery terminal harvest not included.

Conclusion: The data above shows there is literally no correlation between the length of the troll coho closure and the amount of fish the inside fisheries catch. When the trollers had a 0 day closure the gillnetters caught 20%. When trollers had a 10 day closure gillnets got 10%. 4 day closure they got 24%. 4 day closure they got 10%. There is no correlation period.

4

merritt 5

Page 4 of 5

43								
Grand Total	696,767	431,543	735,465	446,730	398,103	149,835	436,268	6,305
							391,239	176,7

Merritt 5

43									6,305
Grand Total	696,767	431,543	735,465	446,730	398,103	149,835	436,268	391,239	176,7

From: Hagerman, Grant T (DFG)**Sent:** Monday, October 31, 2011 11:15 AM**To:** 'capecross@gcl.net'**Subject:** Coho allocation files

Mark,

Here are several files we include in our annual report to the BOF, the 2010 version available at 2010 Troll Annual Management Report. I embedded these files into the email as I don't know if you have MS excel or word.

Year	Commercial Troll		Purse Seine		Drift Gillnet		Nur
	Number	Percent	Number	Percent	Number	Percent	
1989	1,415,512	65%	331,684	15%	252,516	12%	176
1990	1,832,604	67%	377,844	14%	372,645	14%	148
1991	1,719,060	59%	408,872	14%	595,719	21%	166
1992	1,929,899	56%	499,792	15%	696,767	20%	290
1993	2,395,711	67%	464,524	13%	431,543	12%	237
1994	3,466,782	62.7%	954,415	17%	735,465	13.3%	343
1995	1,750,221	56%	595,039	19%	446,730	14%	295
1996	1,906,740	63.9%	440,235	15%	398,103	13.3%	227
1997	1,170,460	64%	184,729	10%	149,835	8%	322
1998	1,636,707	59%	460,885	17%	436,352	16%	197
1999	2,272,619	69.4%	403,597	12%	391,480	11.9%	187
2000	1,124,854	67%	206,601	12%	176,726	10%	170
2001	1,843,997	62.8%	549,730	19%	335,301	11.4%	205
2002	1,310,060	54.8%	423,903	18%	453,622	19.0%	200
2003	1,220,782	57.8%	384,425	18%	430,902	20.4%	74
2004	1,915,007	68.0%	386,663	14%	316,589	11.2%	196
2005	2,036,104	75.2%	339,661	13%	281,418	10.4%	82
2006	1,361,267	74.8%	103,447	6%	272,112	14.9%	86
2007	1,376,737	72.5%	247,463	13%	197,083	10.4%	76
2008	1,273,710	63.3%	219,655	11%	358,657	17.9%	153
2009	1,590,259	67.2%	296,127	13%	345,025	14.6%	133
2010	1,342,212	59.6%	189,851	8%	557,435	24.8%	161
2011	1,300,286	64.9%	338,339	17%	238,103	11.9%	125
1989-2010 Average	1,722,332	64%	384,961	14%	392,365	15%	188
Board of Fisheries Allocations (Established 1989)							
		61%		19%		13%	
89-10 Deviation from Allocations		5.3%		-27.1%		12.1%	
2011 Deviation from Allocations		6.4%		-11.1%		-8.5%	

Note: Annette Island harvest is included; terminal area harvest is not included.

Grant Hagerman

1/15/2012

5 of 9

Public Comment #80

Proposal 295 Pg 1

My name is Steve Merritt. I troll out of Craig, Alaska and I grew up in the town of Wrangell near Chichagof Pass. This letter is in reference to Proposal # 295 made by the Southeast Alaska Seiners Association dealing with a problem in this area. This proposal would increase the seine chum catch in Anita Bay by modifying the gillnet fishery in Zimovia Strait and Chichagof Pass. The Proposal is based on the chum:sockeye ratio taken during traditional District 8 wild stock sockeye drift net openings.

The rationale is that it will help to balance the allocation of Anita Bay fish between the gear groups. The drift net fleet has been using the traditional area 8 Stikine river king /sockeye salmon openings to harvest Anita Bay king and chum salmon. The drift net over harvest of Anita bay king salmon is affecting the allocation imbalance between the troll and the gillnet fleet and, the over harvest of Anita bay chum salmon is affecting the seine and gillnet allocation.

Chichagof Pass is one of the main corridors the enhanced chum and king salmon use traveling to the Anita Bay terminal area. It is in the Chichagof Pass area the over harvesting of enhanced salmon by the gillnet fleet is occurring during traditional district 8 drift net openings. To solve this problem there needs to be some adjustments to the area fished in the traditional District 8 drift net openings.

Isolating Chichagof pass is the first step. The seiners suggest that when the ratio of chum:sockey exceeds 4:1 the area south of Young Rock would be closed to gillnetting.

I recommend moving that Young Rock line north about one mile to the latitude of Hat Island in Chichagof Pass. The Young Rock line is inadequate because it doesn't include the entire Chichagof Pass corridor. To isolate the West end of Chichagof Pass, another line needs to be created on the Southwest end of Woronkofski Is. Beginning at the latitude of Reef Pt. traveling West and intersecting Zarembo Island's eastern shore.

In addition to closing the drift net fishery in this area when they exceed the 4:1 chum/sockeye ratio, I would amend that the above small section of district 8, also be closed to drift netting until the end of the third week of June.

This will stop the unintended or intended, harvest of enhanced king salmon in Chichagof Pass, by the drift net fleet, during traditional Stikine river king and sockeye openings. This above area if closed will not prevent the drift netters from harvesting their entitled Stikine river fish during a District 8 opening.

The area remaining open in District 8 is quite large and closest to the Stikine river delta. (see map attached)

Proposal 295 pg 2

The Chichagof Pass area is described as area 108-10 and 108-20. Department drift net catch data for these two areas shows an annual average catch of 1800 king salmon over the last 10 years. Most likely the majority of these fish are not Stikine river fish, but in fact, Anita Bay enhanced fish. The ADF&G opens these areas to trolling during June because of the high density of Anita Bay hatchery kings traveling this corridor to the terminal area. Specifically for troll access to Anita Bay king salmon. Troll harvest tag data shows 108-10 and 108-20 are of high hatchery abundance.

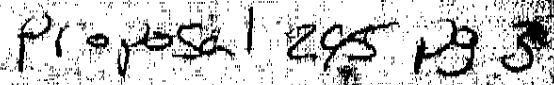
The Anita Bay kings are not necessarily gone from this area by the 3rd week of June. In fact the majority of them would still be there since it is difficult for trollers to get them to bite so close to the terminal area. Most of the trollers hatchery fishing this area quit fishing the third week of June and head for the outside coast to participate in the July 1 troll opening. So basically, this gives the troll fleet more time (about 10 days) to harvest some of these finicky fish before the drift net fleet is allowed to catch most of them.

After the end of the 3rd week of June, the gillnetters would be allowed to fish this area during area 8 openings. They could fish this area until they reach the 4 chum to 1 sockeye ratio, after which, this area would be closed to gillnetting during area 8 openings. Only this time it would be to protect the hatchery chum salmon from being over harvested.

These steps are necessary to insure that the majority of the fish the drift net fishery harvests during Stikine area openings, are indeed wild fish, and not enhanced Anita bay fish. Like the seiners have pointed out, these openings were intended for Stikine kings and sockeyes not Anita bay enhanced salmon.

I would appreciate your influence to adopt and amend #295, with the suggestions above, to solve enhancement allocation problems between the drift net fishery and both the seine and troll fleets. While it may be hard to take, those who have been chronically over the hatchery allocation percentage will have give in order to balance the equation. That is just the plain reality of the situation.

Steve Merritt



Proposal 295 pg 4

Table 319-. Drift Gillnet Harvest in 108-10 and 108-20, 2002-2011.

Year	King	Sockeye	Coho	Pink	Chum
2002	10	112	736	266	1,535
2003	70	679	4,588	4,067	6,445
2004	401	1,262	9,378	2,779	7,997
2005	1,229	4,437	7,249	19,442	79,321
2006	2,023	5,254	12,318	15,347	258,750
2007	4,473	6,465	6,122	14,787	114,055
2008	3,725	1,382	11,046	7,715	50,486
2009	1,732	5,089	8,433	6,734	134,483
2010	1,475	2,516	17,899	3,000	37,490
2011	2,925	3,508	4,899	17,863	115,133

Dear Chairman Johnston and Board Members,

Subject: Oppose 216 and 212; Support 270

Thank you for considering my comments on several proposals. I have been commercial fishing in Southeast Alaska for 21 years.

Proposal 216 - Eliminate non-resident annual limit for Sablefish - OPPOSE

It's hard to imagine any good reason for removing an existing annual limit on a resource that is in decline. Eight sablefish per person per year is plenty - no one needs more than that. If anything, the annual limit should be smaller. I have a family of five, including three teenagers - we eat a lot, and we eat fish 4-5 days/week, and there's no way we'd eat 40 sablefish per year. Nonresident anglers are targeting multiple species and will generally be taking home considerable poundage of other fish as well. Removing the annual limit would encourage waste and black marketing. I personally overheard charter clients on a jet to Seattle talking about "paying for their trip" by selling the fish in their boxes. We all know this goes on, and annual limits are the simplest way to remove the temptation for this kind of abuse.

Removing nonresident annual limits would almost certainly have the effect of reallocating commercial quota to the guided sport industry. For a family of year-round Southeast Alaska residents with considerable investment in a Chatham Strait sablefish permit, this is an unwelcome idea, to say the least. The commercial quota has been steadily reduced over the last decade, so how could an increase in the nonresident sport catch possibly be justified? Please retain the nonresident annual limit by rejecting this offensive proposal.

Proposal 270 - Require permit for subsistence/personal use sablefish - SUPPORT

Declining resources justify careful monitoring. Permitting and reasonable annual limits are an acceptable way to support viable long term health of sablefish. As pressure on all fish resources increases, it makes sense to close gaping holes such as the existing unlimited subsistence harvest of sablefish.

Proposal 212 - Increase sport allocation of demersal shelf rockfish - OPPOSE

Rockfish are an important component of the commercial halibut fishery. Halibut fishermen have been body-slammed by cuts in recent years and have supported conservation in the interest of a long term fishery. If the halibut quota increases, the rockfish allocation will be needed and if not, directed rockfish fisheries will help offset lost halibut income. The commercial fleet has been innovative, proactive, and collaborative in developing ways to better control rockfish catch rates; ALFA can provide extensive details on how this has been done. The charter sector's position that rockfish should be reallocated from the commercial sector because they have been overfishing makes no sense and is akin to charter captains walking down the dock asking

commercial fishermen to hand them hundred dollar bills. Please send the charter fleet a strong message that they need to figure out ways to stay within their allocations by rejecting Proposal 212.

Thank you,

A handwritten signature in cursive script that reads "Laurie Mistrella". The signature is fluid and includes a large, stylized loop at the end of the last name.

Laurie Mistrella

State of Alaska
Board of Fisheries
FAX 907-465-6094

Feb 8, 2012

Gentlemen,

I strongly urge the Board to OPPOSE proposal 212!!
I do not believe that over fishing by the charter
guide fleet should be rewarded by more fish
allocation. This proposal is contrary to sound
management and an outrage!

I have commercial halibut fished and subsistence
fished throughout Southeastern Alaska for the past
30 years and observed the continued decline in
yellow eye populations. Over the last 20 years,
I have also observed by-grading by charter boats
returning to port who discover that they have
over limit yellow eye on board. The smaller fish
go over board to get legal. I have picked up
many fish floating in the wake of these
charter boats.

I recommend closure to all bottom fishing, both
commercial and charter in areas of yellow eye
habitat that has been determined to be critical habitat.

I remain

Ben Mitchell

Ben Mitchell
103 Darwin Dr.
Sitka, Alaska

ATTN: BOF COMMENTS
Boards Support Section
ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear BOF and Boards Support,

My name is James Moore of Haines. I have participated in the commercial salmon industry for over forty years as a power troller. I am a first generation fisherman having happily discovered in trolling, not only a good living, but a good life. My children grew up fishing summers with their mom and I and my two sons, Joshua and Jonathan are now also very successful fishermen.

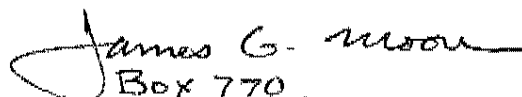
I am writing to support BOF proposal #325 (as amended by the JRPT) of the 2011/2012 proposed regulation changes book. Over the past two decades I have been working on developing and refining technique for catching chum salmon and those efforts have been rewarded with considerable success. I have shifted more effort in this direction through the years and now with the development of an Icy Straits chum fishery I have targeted chums almost exclusively.

The fish we produce in the Icy Straits fishery are nearly ocean bright and have generated some healthy competition among the processors as well as increased interest in the troll fleet. We saw a significant increase in effort this year. Although the chum fishery is the cleanest I have ever seen as far as bycatch, I am concerned that since there is no hatchery chum management plan in effect this valuable fishery could be closed under hatchery king management. To protect both directed chum and Chinook fisheries, common sense would suggest they be managed separately.

I would like to point out several very positive effects of this newly developing fishery.

- It allows trollers access hatchery chums in an area that does not disrupt terminal net fisheries.
- Increased catch % of hatchery chums goes toward correcting imbalances in allocated shares. Trollers are at 19% of an allocation of 27-32%
- There is a real economic boost not only to the local small boat fleet, but also to the local communities of Hoonah, Excursion Inlet (Haines Borough), not to mention Juneau, which all provide food, gear, fuel, repairs as well as processing.

Again I urge you to approve BOF Proposal #325. A fishery such as this is the perfect training ground for my six grandchildren and allows their grandfather a productive place to fish in the relative calm of Icy Strait.

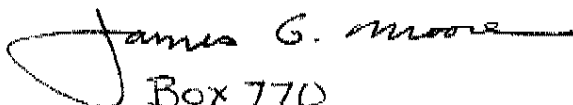

Box 770
Haines, AK 99827

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear BOF and Boards Support,

My name is James Moore of Haines. I have participated in the commercial salmon industry for over forty years as a power troller. I am a first generation fisherman having happily discovered in trolling, not only a good living, but a good life. My children grew up fishing summers with their mom and I and my two sons, Joshua and Jonathan are now also very successful fishermen. I am writing to urge you to adapt **BOF proposal #326** of the 2011/2012 proposed regulation changes book. Here are some of my thoughts on the matter:

1. Opening this small piece of area 11A would serve to provide trollers access to an area near the release site which often proves very productive for chum troll gear, particularly during bright weather when the fish are sometimes deep.
2. I would expect a modest number of trollers to fish here, especially the first year, since the area would open during the first Chinook opening.
3. Because chum fishing technique is species specific and the proposed area is sited to avoid the king drags, the bycatch would be minimal.
4. The small area proposed was selected to minimize gear conflict with both sport and gillnet fisheries which favor the edges and the flats for their lines, pots and nets.
5. A fishery here could be a real boon for small Juneau based trollers. As the July 1 summer troll season approaches it is not an uncommon occurrence for strong southerly winds whip up making Lynn Canal an especially dangerous passage for them to negotiate. A good local option could be a lifesaver.
6. Addition of more potentially productive areas for trollers to fish tends to disperse the troll effort which is better for production as well as for management.
7. The additional opportunity for trollers to harvest hatchery chums would help to move the % enhanced salmon for trollers in the right direction.


Box 770
Haines, AK 99827



REPRESENTATIVE CATHY MUÑOZ

RECEIVED
FEB 03 2012
BOARDS

February 2, 2012

Alaska Board of Fish
Attention: Shannon Stone
P.O. Box 11526
Juneau, AK 99811

Reference: Proposal #247

Dear Ms. Stone,


I am writing in support of Proposal 247 which would develop a management plan to protect and enhance a roadside sport fishery in Juneau.

Roadside fisheries such as Twin Lakes and Wayside Park are greatly enjoyed by the community, and expansion of this type of roadside sport fishery, accessible by bicycle or car, is a great enhancement of community activities.

As you know, Fish and Game employees, 4-H, and community volunteers have offered an annual event to teach Juneau's youth how to sport fish. Providing additional locations around Juneau through a management plan would ensure that local citizens who may not have access to boating and saltwater fisheries, can continue to participate in this popular activity.

Thank you.

Sincerely,


Cathy Muñoz
Representative, District 4

Comments on Proposals for Southeast & Yakutat Finfish February 24 - March 4, 2012 by John Murray, 224 Observatory Street, Sitka AK 99835 Page 1

Proposal 199 Support

This proposal closes a loop-hole that is being used to circumvent the system by a small number of boats. Where there is a loop hole, someone will drive their boat through it.

Proposal 206 Support

We need to get a fishery going on spiny dog fish. This species is one of the only major predators which is not commercially harvested to the detriment of the species. Management plan or not, start this fishery.

Proposal 212 Oppose

See what will happen if nothing is done? "Because DSR is an unavoidable bycatch while sport fishing..." This is blatantly untrue because fisherman can reduce bycatch as proven by commercial hook and line fishermen. It should be pointed out the longline allocation for halibut are down this leads to reduced harvest of D.S.R. poundage. When halibut stocks rise, D.S.R. will be further utilized.

Proposal 216 Oppose

Black cod possession limits are already adequate for non-resident at 8 fish.

Proposal 218 Support

This area has no conservation concerns. It allows trollers to catch ling cod (when open) in both areas – CSEO and Sitka Sound. As it stands now if a troller had a ling-cod on board they couldn't even anchor in Sitka Sound legally. We are talking about a small amount of ling cod in total.

Proposal 219 Support

I am asking the Board for a modest increase of 2,500 pounds of ling cod in an area which is 50-60 miles long and about 3-5 miles shore seaward. As shown in Table 219-1 ADF&G, the total harvest (all gear) is 33,556 out of a guideline harvest range (GHR) of 0-40,000. The proposed increase would go to the troll fishery bycatch.

If passed this proposal would not harm resource and it would help trollers who fish in different regulatory areas remain legal. 5AAC 28.160 (e).

Proposal 221 Oppose

5AAC 28.165 Ling Cod allocation guidelines. These guidelines were worked out after much hard work. They do not need revising to placate an over capitalised charter fishery.

Proposal 223 Support

5 AAC 28.130 This proposal clarifies what one line is (see underlined). Some fishermen looked at this as one of those gray areas. It needs clarity (black and white). This is one of these loop hole deals.

Comments on Proposals for Southeast & Yakutat Finfish by John Murray
page 2

Proposal 226 Support

Some fishermen that fish spawn on kelp in SE are slob. The area in Hoonah Sound is a mess which impacts other users. They need to clean up their act. It is also a health and safety concern.

Proposal 239 Support (with revised boundaries)

I believe a closed area of a smaller size is not a bad idea. The current proposal is too large. A core area closure has merit I believe, this could create some peace in the valley which is needed.

Proposal 240 Support

Sitka Sound bait herring is preferred by fishermen. The stocks can handle this and it lessens the carbon footprint. The alternative is to bring in lower quality herring from the East Coast or other places in Southeast. I would suggest taking **10% of the proceeds** to go toward study of the fishery. Many of us believe there is a need for research. Example's where the funds could be used are mortality of herring in test fishery, stock composition, mortality when a seiner lets a set go or a net is torn from a heavy set.

Proposal 248 Oppose

First, one can always stop fishing or move. Education is the answer here. This is the slippery slope proposal which is sure to bring up issues, i.e., catch and release, fishing ethics, enforcement issues. Good Luck.

Proposal 252 Support

I support power assist for disabled or challenged fishermen. Other fishermen do not need power assist to harvest. This is called sport fishing not meat fishing.

Proposal 273 Oppose

Unwarranted intrusion into a long time harvest practice. It is also burdensome to harvesters and it creates bad feelings among herring egg harvestors.

Proposal 284 Support

Trollers need more area to harvest their historic catch of TAKU kings. The catch is negligible for trollers in this area because of the area restriction. Trollers have done their conservation duties to rebuild Taku Kings. We are only asking for some **decent** opportunity.

Comments on Proposals for Southeast & Yakutat Finfish by John Murray
Page 3

Proposal 310 Support

5AAC 29.080 This proposal would add around 4,000 King salmon to the winter guideline harvest range. When these fish are at optimum value. A slight decrease in summer direct fishing times is the trade-off. The benefit to the mostly local winter trollers outweigh the loss of a very small time period in the summer. We are talking about a very small loss of time in summer which will not affect overall mortality very much.

Proposal 311 Support

These coho are available in some inside areas of Southeast. There is no biological or conservation reason not to open June 1st.

Proposal 312 Oppose

Why this proposal is here at the BOF meeting is a good question. There is no conservation problem, i.e. stocks are within escapement range. The gillnet allocation is over their range for coho by a small amount. Also, there is no correlation between troll closure days and gillnet catch. Micro management at its worst.

Proposal 313 Support

Catch in recent years trollers have had season extension: 2003 - 18K, 2004 7K, 2006 6.5K, 2009 3.7K...The catch is low for a number of reasons: weather is tough, availability down, most trollers have quit. Catch on extension years less than 1% of total catch. Hatchery allocation percentage will increase for trollers. . ADF&G can use EO to close if conservation of stocks are needed or close selected corridors. It seems some of our major hatchery produced coho are returning later in season IE Neets Bay, Mist Cove and Port Armstrong.

Proposal 314 Support

While this is very limited compared to Proposal 313, it has merit if Proposal 313 fails. It will help trollers catch hatchery produced coho. This will help the hatchery allocation unbalance. It should be noted Southeast gillnetters are open during this time period.

Proposal 315 Support

Same reasoning as Proposal 314. Proposal 313 is preferred.

Proposal 317 Support

Access to hatchery coho is needed to help balance hatchery allocation ratios for trollers.

Proposal 318 Support

Housekeeping - clarification.

**Comments on Proposals for Southeast & Yakutat Finfish
Page 4**

by John Murray

Proposal 319 Support

This will help hatchery allocation ratios for trollers.

Proposal 320 Support

Sharing the harvest when there is a harvestable surplus is fair and equitable. Trollers along with gillnetters took cuts to rebuild stocks. Gillnetters mostly benefit from conservation of resource. It should be noted trollers do have a history of harvest in this area.

Proposal 325 Support as amended.

This Proposal will allow trollers to harvest returning hatchery chums. This will help balance the Southeast enhanced salmon allocation imbalance. Trollers need more area to make this happen.

BOARDS

2012

RECEIVED

February 1, 2012

to the Board of Fishers:

This concerns Proposal 312 -5 AAC 29,110. I object to its approval by the Petersburg Advisory Council. I have been a Commercial Troller for well over 20 years and heavily depend on the income. Talking to Fish and Game biologist Patti Skeens and Troy Tynes, they have informed me there isn't a conservation nor allocation issue to support passing this proposal. I trust the Board will look into this and take the appropriate action. Thank You for your time.

Sincerely, Frank Neidiffer
F/V Rastlos
Petersburg Advisory Council Troll Seat
907-518-1088



February 6, 2012

Mr. Karl Johnstone, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

RECEIVED
FEB 09 2012
BOARDS

Re: Support Proposal #285 and #286 and repeal the 58' limit.

Dear Chairman Johnstone and Board Members:

I live in Juneau and I own a vessel that is longer than 58. I would like to be able to seine salmon in Southeast. Please repeal the 58 foot limit so that I can improve my business.

Even though my vessel is longer than 58' it is actually smaller than some 58' vessels now seining salmon in Alaska. There has been a large range of packing ability in the fleet for years so what is the difference with what length the boat is. There are so many other ways ADF&G regulates the fisheries with net sizes, areas, and openings and closures and participation is controlled by CFEC, so the sizes of vessels in the fishery, which have grown anyway, isn't really relevant anymore.

My Alaska based fishing vessel is smaller than some vessels now in the fishery and I cannot participate because of the limit. If the longer vessel is actually "smaller" is it fair that a "larger" vessel is able to fish just because it's shorter and not allow a smaller vessel because it's longer? I am allowed to seine herring in Sitka and the boat works fine there. It should work for the salmon fishery, too. Either Proposal 285 or 286 would be a help to me. This rule is creating a hardship for the Alaska residents who have vessels longer than 58' and cannot use them in salmon seine fisheries. Please repeal the 58' limit in Southeast.

Respectfully yours,

Norval Nelson

F/V "STAR OF THE SEA"

1625 Fritz Cove Rd.

Juneau, Alaska, 99802

Feb 6, 2012

ATTN: BOF Comments
Board Support Section ADFG
PO Box 115526
Juneau, AK 99811-5526

Fax: 907 465-6094

I feel very strongly on several proposals before you.

Proposal 216

This proposal wants to repeal the limit on nonresident sport fish sable fish catches.

I definitely feel that should NOT happen!! The Chatham and Clarence sablefish fisheries are already fully allocated and with stocks at a low this will place additional strain on these fisheries. An unlimited new fishery in an already fully utilized and regulated one seem ludicrous to me as it will place fishermen with historic dependence on these fisheries at risk. To allow the nonresident sport fishers to go from an already too high bag limit to unlimited is asking to cause trouble with stocks, as well as opening the door for abuse by "sportsmen" by under the table sales of this extremely valuable fish.

I feel the BOF should go the other way and decide in the way of conservative management here as to do otherwise will cause more and more problems. In reality I really feel that the present catch limit should be about 1/4 of what it is now.

Proposal 212

This proposal wants to reallocate the Demersal Shelf Rockfish between the sport charter and the commercial fleet by upping the sport charter from 16% to 25%.

This is SO WRONG!!!

The whole rationale behind this proposal is completely flawed and rotten.

If your child steals from the store does that mean the store then needs to give that same child more of the item for free because the child felt the need to steal it??? Nope.

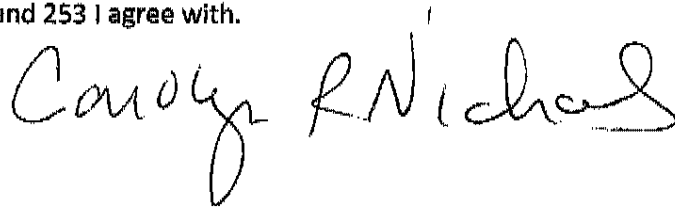
The sport charter has been going over their allocation -- why??? Because they DO NOT care about conservation of the stock!!! The commercial fleet has gone to great measures to keep their catch under their allocation- why??? Because they DO care about the health of the resource.

To reallocate this will be rewarding the sport charter fleet who stole- and will be at the expense of the commercial fleet who has a historic dependence on it as both a directed fishery and a valuable component of the halibut fishery and has worked very hard to keep themselves under their allocation.

Rewarding the fleet that doesn't care enough to stay within allocations is darn poor management- if that is the way the BOF is going to manage fisheries then what meaning do allocations and caps have?? There would be no reason for any fishery to stay within them if OVERFISHING gets you rewarded.

Keep the allocations where they are and warn the sport/charter to get their catch under control or be penalized for it.

Proposals 249 and 253 I agree with.

A handwritten signature in black ink that reads "Carolyn R. Nichols". The signature is written in a cursive, flowing style.

Thank you

Carolyn Nichols

111 Knutson Drive

Sitka, AK 99835

February 7, 2012

Mr. Karl Johnstone, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Support Proposal #285 and #286.

Dear Chairman Johnstone and Board Members:

I am an Alaskan and I run a 54 foot wooden seiner for salmon in Southeast Alaska. The 58 foot limit is not just limiting my boat, it is limiting me. It is limiting my options to upgrade my equipment to remain competitive not only in the salmon seine fishery but in my overall fishing business. I have fished the 54 foot vessel for awhile and I am looking for another vessel to purchase so I can keep improving my position in the fishery. There are some longer boats for sale that would work for me and my father has a 65 footer I run for Sitka herring which would work well for me in salmon. Because of the length limit I can't consider them as options.

I know there are many in the industry who may be content where they stand but I am not one of them. I am a younger generation fisherman trying to grow in the industry and I am frustrated that those who have made it to a good position have the ability to make it more difficult for me to do the same by keeping this old rule. When most of the older generation in the fleet got into seining things were better than they are now. Boats cost less, fuel and other costs were cheaper, and fish prices were comparable so it was easier to pay for the boat and still have money to live on and spend time with family. Fishing for salmon is improving and I want to upgrade to take better advantage but I can't with the limited options available to me. Maintaining vessel value is a big concern for a lot of fishermen and it also is for me but what is the point if nobody can afford to strengthen their business. I don't think values for 58 footers will go down just because longer boats are allowed in Southeast. 58 footers will still be valuable to seine in other areas. Removing the 58 foot limit in Southeast would give me a better chance to have a more positive future in fishing.

Respectfully yours,

Nick Nelson

F/V "Lovey Joann"

ATTN: BOF Comments
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Juneau, AK
January 31, 2012

RECEIVED
FEB 08 2012
BOARDS

Dear BOF and Boards Support,

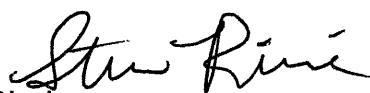
I am writing in support of BOF proposal #325 (as amended by JRPT) of the 2011/2012 proposed regulations changes book. I first came to Alaska in 2001 as an Americorps volunteer and bought my first troll permit and boat a few years later. I have worked extremely hard and had several successful seasons allowing me to put down roots in the state and in the local community. The ability to access the chum fishery over the past few years has allowed my business operations to become truly successful and has provided me with an opportunity to invest more in the local communities and economy which support my business.

I support BOF proposal #325 because access to the Icy Strait chum fishery is integral to my success as a young fisherman and I believe that without this proposal, and the subsequent development of a hatchery chum management plan, the fishery is at risk of unnecessary closure under the hatchery king management plan. In 2011, trollers caught only 19% of their allocated hatchery share of 27-32%. This amounts to around \$4,000,000 of unrealized income for the fleet. The Icy Strait chum fishery provides an ideal opportunity for trollers to fully utilize the full percentage of their hatchery allocation without disrupting existing hatchery terminal area net fisheries. The Icy Strait Chum fishery is an ideal example of a successful and meaningful fishery with impacts to all participants, and processors. Market conditions are favorable to high quality harvesting and production techniques for species in extremely high abundance.

In addition, it provides important income not only to the individual fisherman who benefit from this fishery, but to the economies of the many local communities who provide services to these fisherman. The Icy Strait Chum fishery also provides the ideal learning environment for new fisherman who generally have smaller boats that are at a disadvantage to larger, more established fisherman on the open ocean. Fishing in calm, protected waters allows these small boat fisherman access to a vibrant and valuable fishery upon which they can hone their skills and expand their opportunities.

Please give your consideration and support to BOF proposal #325. As a young, self-made fisherman I can attest to the value and importance of this important fishery.

Sincerely,



Steven D. Ricci
Alaska Troller Association Board Member
Douglas Island Pink and Chum Board Member

ATTN: BOF Comments
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Juneau, AK
January 31, 2012

Dear BOF and Boards Support,

I am writing in support of BOF proposal #326 of the 2011/2012 proposed regulations changes book. I first came to Alaska in 2001 as an Americorps volunteer and bought my first troll permit and boat a few years later. I have worked extremely hard and had several successful seasons allowing me to put down roots in the state and in the local community. The ability to access the chum fishery over the past few years has allowed my business operations to become truly successful and has provided me with an opportunity to invest more in the local communities and economy which support my business.

I support BOF proposal #326 because it would allow trollers to access the NE corner of 11a during the first 20 days of July in order to target DIPAC chum. This is especially important in light of the discrepancy between the financial support trollers provide to Southeast Alaska Salmon enhancement programs and the benefit they receive specific to the Chum fishery. In reality, trollers pay 35% of the Southeast Salmon Enhancement tax, but are accessing only 19% of the total allocation. BOF proposal #326 would give trollers equitable access to this valuable fishery without disrupting any terminal net fisheries. Chum trollers are the ideal fit in this area because the depth at which they fish and their slower speed do not conflict or seriously competed with the existing sport Coho and Chinook drags in Juneau.

Not only would this proposal result in the equitable access to a fishery in which the trollers invest a significant amount of funding annually, but it would provide important income not only to the individual fisherman who benefit from this fishery, but to the economies of the many local communities who provide services to these fisherman. Trollers have been able to follow the recommendations of fishery marketing experts and increase value of a high production resource, by following bleeding and cleaning techniques already employed in other troll fisheries.

Please give your consideration and support to BOF proposal #326. As a young, self-made fisherman I can attest to the value and importance of this important fishery.

Sincerely,



Steven D. Ricci
Alaska Troller Association Board Member
Douglas Island Pink and Chum Board Member

2/2/12

RECEIVED

FEB 08 2012

BOARDS

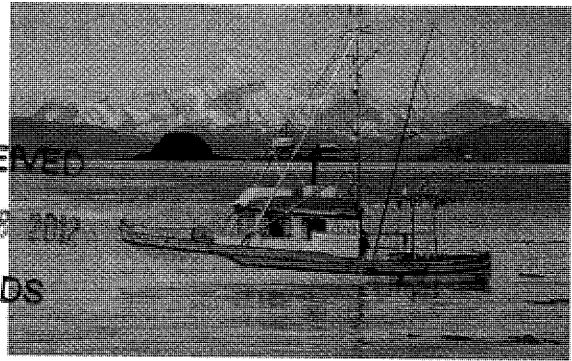
Dear BOF members,

I'm writing to urge you to support proposals #325 and #326. I've trolled in SE for 40 years and the Chem fishery is an integral part of our troll season. It spreads the fleet out and makes for a better season both financially and logistically. Like other user groups when one run fails (like in Sitka) we need access to other runs. The Chem troll fishery should be expanded until we're up to our 30% or so allocation.

Yours truly,
Dennis Hicks
F/V EH

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RECEIVED
FEB 08 2012
BOARDS



Dear Chairman Johnstone and Board members,

As the owner/operator of a commercial troll vessel for 36 years I understand the importance of the Board of Fish (BOF). Taking a few minutes to express my support of proposition 325 and 326 is a small price to pay for such an important event. The BOF was established, in part, to hear comments from fishermen, as we are the vanguard to these regulations that protect our resources and our livelihoods, and I appreciate the opportunity.

As a small boat owner I particularly utilize the hatchery salmon which afford me the chance to fish calmer waters. I, and many of my colleagues, particularly those with families on board, can often fish close to shore and close to home in these fisheries. This is true for the newly developing fishery for chums in the Icy Straits area which these two proposals address.

Also included in my preferences for this fishery are:

1. The low by-catch of other salmon species. For the fifteen or twenty years I have been targeting chums I have found I can overwhelmingly control what I catch.
2. The ever increasing cost of trolling affects my profits and chum fishing is the one species that requires one third the fuel than that of other troll species.
3. Trollers have been paying in to our enhancement programs for some fifteen or more years now and we as a gear group are well and truly below our allocation. I am hopeful that these additional areas will help to relieve us of some of the pressure of paying for fish we do not get to catch.
4. It greatly helps ALL trollers by spreading out the effort by relieving pressure on the spring king hatchery programs as well as the major king opening in July.

Having participated in fishing Icy Straits for the past two Junes, I see the vulnerability of this fishery. Although this area is worth hundreds of thousands of dollars to trollers it could easily be shut down due only to the lack of a management plan. That is why I believe these proposals are so important. Please closely consider these plans that could go a long way in solving some of the problems that exist.

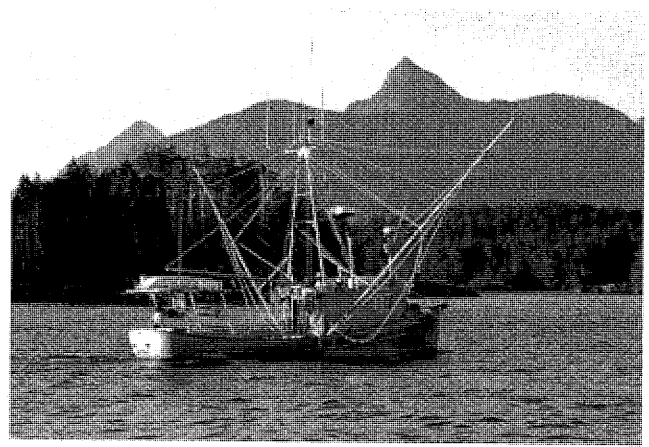
One final note, I am opposed to proposition 312. There does not seem to be any good science to support the thought that a mandatory 10 day coho closure would benefit the species.

Sincerely,

Linda Danner
F/V Amberjack

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RECEIVED
FEB 08 2012
BOARDS



Dear Chairman Johnstone and Board members,

My name is Doug Rendle; I have been in the troll industry since 1997 and captain since 2000. I am commenting on proposal #325 and the opportunities it will create for trollers in Southeast Alaska.

Since 2000, when I rescued my first troll vessel from Harris Harbor in Juneau, and brought it back to life, chum trolling has evolved considerably. After converting an ice boat to a slush bag system for round troll salmon I headed to Hidden Falls to fish hatchery chums, to make my million, at 13 cents advance per pound. To date chum trolling is still my primary source of income and a passion.

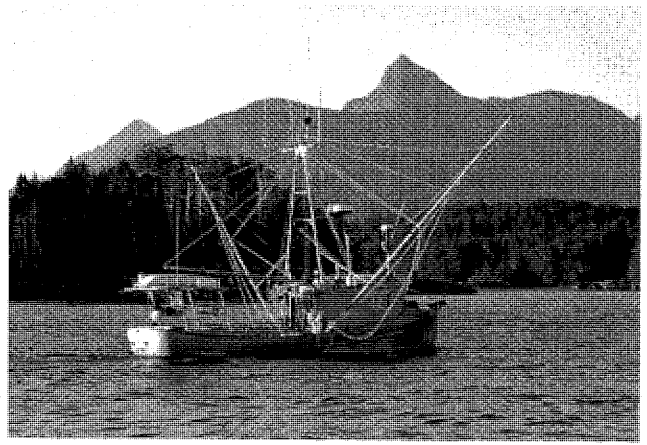
Since 2007 I have chosen to be involved in fisheries politics as a way to better understand the decision making process that shapes the future of my fishery. I feel proposal #325 is crucial in conserving and expanding troll opportunity in the Icy Straits area for targeting the highest quality chums in Southeast Alaska. An important part of #325 to me is the expansion on the Admiralty Shore which would spread out the chum troll fleet. I am excited about the opportunity to fish this area.

In my career I have participated in multiple fisheries from the Washington coast to Kodiak Island and believe chum trolling provides the best opportunity for me to make a living fishing.

Sincerely,

Doug Rendle,
F/V Sassy
PO Box 62
Sitka, AK 99835

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094



Dear Chairman Johnstone and Board members,

My name is Doug Rendle; I have been in the troll industry since 1997 and captain since 2000. I am commenting on proposal #326 and the opportunities it will create for trollers in the Juneau area.

This proposal could benefit Juneau area trollers and also gillnetters with troll permits. I own both a SE drift gillnet and power troll permit as do many other SE fishermen. I believe this proposal provides a rare new fishing opportunity on surplus DIPAC hatchery chums.

Governor Parnell emphasized how his administration will provide new opportunities and eliminate outdated regulations. This proposal is a good example of how the Board of Fish can do both by allowing trollers back into a small portion of 11A (from which they have been excluded since the 70's) to target hatchery chums not previously available.

Juneau was my first home port in SE Alaska and the lack of troll opportunity forced me to leave and relocate in Sitka. Proposals like this could increase troll harvest and associated business activity in Juneau similar to what the Neets Bay hatchery chum troll fishery has done for Ketchikan.

Please adopt #326.

Sincerely,

Doug Rendle,
F/V Sassy
PO Box 62
Sitka, AK 99835

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RECEIVED
FEB 08 2012
BOARDS

Sitka, AK
January 22, 2012,

Dear Chairman Johnstone,

I am writing to support BOF proposal #325 (as amended by the JRPT) of the 2011/2012 proposed regulation changes book. I support this proposal because I am a lifelong salmon troller and marine conservationist. Hatchery chums are an important part of my business and a means of conserving our wild salmon resource. I began targeting chums as a handtroller in 1980. Between 1980 and 1990 I spent hundreds of frustrating hours attempting to get chums, in Excursion Inlet in particular, to bite. Beginning in 1988 we made some significant strides and in 1990 a group of us collaborated to discover the combination of gear, speed, and technique to produce enough to seriously target hatchery chums instead of Coho and Chinook.

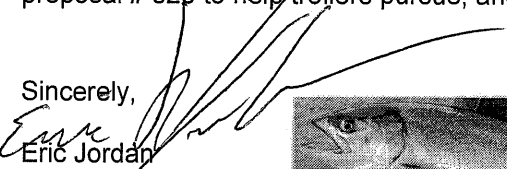
I have been targeting pinks and chums in the Cross Sound/Icy Strait area since the early 90's. My wife, sons, and grandchildren are all involved in the fishery. I love this fishery because the fish are chrome brite, the Icy Strait and most chum troll areas, are protected from ocean swells, and the by-catch rate is the lowest I have experienced trolling.

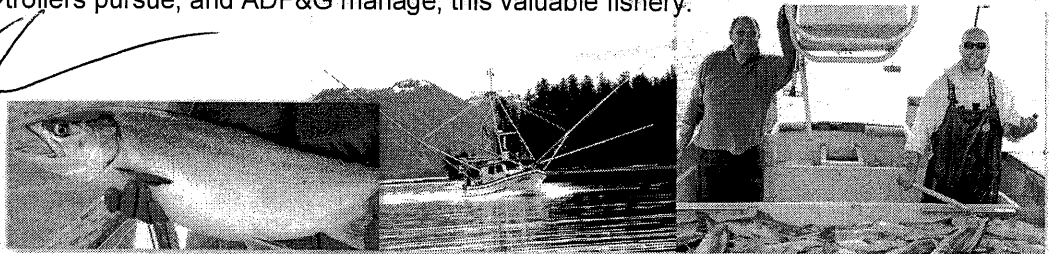
I am concerned that the hatchery chum troll fishery in Icy Straits could be closed down by Chinook hatchery management unless the BOF approves #325 as amended. I am aware that ADF&G estimates trollers targeting chums in Icy Strait last year caught 600 chums per legal Chinook. It makes good sense to have a hatchery chum troll management plan in this area which will protect both the directed Chinook and Chum troll fisheries.

In 2011 trollers remained well below their allocated share of 27-32% of SE enhanced salmon harvest at 19% and the difference was worth about \$4,000,000.00. The Icy Strait area is the best opportunity I see for trollers to continue to improve their hatchery harvest % without disrupting hatchery terminal area net fisheries. Part of proposal 325 expands the chum troll fishery in late June toward the hatchery release sites onto the Admiralty shore. I think this proposal is the best opportunity for me to improve my share of the SE enhanced salmon allocation.

I listened to Governor Parnell's State of Alaska address to open the legislature last month and heard him talk about his administrations emphasis on providing new opportunities for Alaskan small businesses. The Icy Strait chum troll fishery is an example of where Alaska, through the BOF, can promote opportunity for hundreds of Alaska trollers and other businesses that service them.

Finally, chum trolling provides an opportunity in my small boat to work in relatively protected waters which makes a huge difference to my production and family well-being. Please approve BOF proposal # 325 to help trollers pursue, and ADF&G manage, this valuable fishery.

Sincerely,

Eric Jordan
F/V I Gotta,
103 Gibson Place
Sitka, AK 99835



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Sitka, AK
January 22, 2012,

Dear BOF and Boards Support,

I am writing to support BOF proposal # 326 by the Chum Trollers Association (CTA) to open a small "postage stamp" area of 11A to pink and chum trolling the first 20 days of July. As secretary for the CTA I helped craft this proposal but this letter is personal. While this proposal was not endorsed by the SE enhanced salmon Joint Regional Planning Team, due to opposition by gillnetters, it was also not asked to be withdrawn. I am hopeful that after taking a good look at the economic opportunity this proposal presents for trollers and the likely relative minimal comparative loss to gillnetters, who are well ahead of their SE enhanced salmon allocation %, the Board will support.

I hand trolled and sport fished in this area when I lived in the Tee Harbor area in the early 70's. This proposal is carefully crafted to avoid sport drags for Chinook and Coho. As a pioneer in the chum troll fishery I have observed little or no conflict with sport fishermen when we are fishing deep water at very slow speeds for chums.

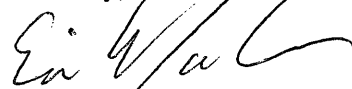
This proposed area is sited between the 15C gillnet area and the Amalga Harbor cost recovery area. It is smaller than the small area in 15C (known as the "postage stamp area") in the ADF&G 2011 Management Plan for the Lynn Canal (15C) drift gillnet fishery. It would seem to me that most of the chums in this area would be bound for cost recovery.

I believe, based on my personal experience in Neets Bay, Silver Bay, Hidden Falls, and Deep Inlet, that these hatchery chums are likely to bite our troll gear in this area adjacent to the release site. Based on my experiences in the other terminal areas I foresee practically no by-catch. It is conceivable to me that this fishery could be worth thousands of dollars to the few trollers choosing to forego the July 1 SE wide Chinook and coho opening to pursue this opportunity.

I met with Territorial Sportsmen (TS) on this proposal and #325. They had some great questions about whether chum trollers would be willing to use barbless small hooks and if there was a way to limit the # of trollers fishing in this area. I have used barbless hooks to fish chums for years because they are much easier to remove from a tough chum's mouth. However, I don't believe we have enough by-catch to require barbless hooks while chum trolling. We are almost all using size 6 or smaller hooks to target chums without regulation. TS also asked how much troll effort to expect in this area if opened to trolling. I can't predict future effort but noted ADF&G estimated 58 trollers targeting chums in Icy Straits from the 3-10th, and 27 from the 10-17 in July 2011. I think the dates corresponding with the summer Chinook opening and good Behm Canal chum fishing will minimize exploratory effort here in 2012, but if it proves productive then troll effort will build.

Finally, the 11A chum troll fishery proposal is an example of where Alaska, through the BOF, can promote opportunity for Alaska troll businesses and those that service them. It could be a wonderful family fishery for me as my wife and granddaughters, my crew of the future, can join me working off of the ocean.

Sincerely,



Eric Jordan, Skipper
F/V I Gotta
103 Gibson Place
Sitka, AK 99835



Attn: BOF Comments
Board Support Section
ADF&G
PO Box 115526
Juneau AK 99811-5526

January 27, 2012

RECEIVED
FEB 04 2012
BOARDS

Chairman Johnstone and Board of Fisheries members,

I am writing to support BOF proposal #325 (as amended by the JRPT) of the 2011/2012 proposed regulation changes book. I am concerned that the hatchery chum troll fishery in Icy Straits could be closed down by Chinook hatchery management unless the BOF approves #325 as amended.

My husband, Karl Jordan and I have been taking our two young daughters out on our commercial trolling boat since our first daughter was born in 2004. We had the most wonderful fishing experience last summer in the Hoonah area. We enjoyed the calm waters and the consistency of the nice bright fish.

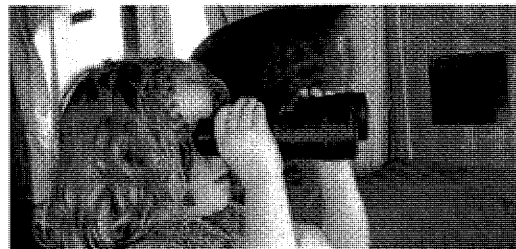
Hoonah is such a beautiful area and our daughters still remember it as a fun place with a playground and where they got to share ice cream with grandpa during a day at shore. This was the perfect fishery for our whole family to enjoy.

I am hoping that you consider proposal #325 which will support our family to have continued and expanded opportunities to fish this area in the future. We are the next generation of fisher people in Alaska and these kinds of experiences are what keep us families going in the troll business.

Thank you for considering my perspective.

Sincerely,

Julie J. Jordan
FV Saturday



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RECEIVED
FEB 08 2012
BOARDS

Sitka, AK
January 31, 2012,

Dear BOF and Boards Support,

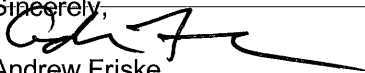
My name is Andrew Friske and I have been commercial trolling for over 17 years in southeast, Alaska. I am writing to support BOF proposal #325.

I have been fortunate enough to have trolled for chum in Icy Straits the past two years. I have become such a believer in the potential of this fishery that I am making some large investments in my freezer troller to take advantage of the beautiful, silver fish that come from this area. I have also invested many hours negotiating new chum markets where I can freeze chum at sea, specifically from the Icy Straits area.

Proposal #325 is very important to ensure that this new hatchery chum trolling area be considered as such. The proposal treats the fishery as it should and addresses troller concerns about emergency closures with high Chinook catches. It also opens the area up so trollers can spread out which is essential for quality chum fishing.

I am excited for this new fishery in Icy Straits to grow and passing proposal 325 is a key step to helping it last a lifetime.

Sincerely,


Andrew Friske
3004 Barker St
Sitka, AK 99835

Sid Carle
Cascade Street
Sitka, Alaska 99835
February 2, 2012

RECEIVED
FEB 08 2012
BOARDS

Chairman Johnstone & Board of Fish Members,

I am a STA member, I am 70 years old and have lived in Sitka for 30 years. I have subsistence fished for salmon, deer, halibut, and herring all my life; and I have commercial fished all of my adult life. I have not had a problem in the past ten years harvesting subsistence herring eggs. It does take time and hard work but with that herring eggs can be had.

The herring fishery is important to me and my family and my community of Sitka. The herring fishery does not interfere with the subsistence fishery and they can exist side by side.

Sincerely,

Sid Carle



Charles Backus
F/V Reiver
February 6, 2012

RECEIVED
FEB 02 2012
BOARDS

Dear Board of fish members

I am opposed to closing or changing the Sitka Sac Roe Herring fishery core areas.

I have been a part of the Herring fishery for 5 years as a tender deck hand, and tender captain. I depend on the herring fishery for part of my living. I have also participated in harvesting eggs for the community, and what I have learned from harvesting on that scale is nothing short of amazing. As an Alaskan native and STA member, I have been harvesting herring eggs with my family for most of my life and we never harvested more than what was needed for our family. The amount of eggs that Steve Demmert (Julia K) and I (Traci-C) harvested was massive. And to say that the subsistence needs are not being met is crazy to me because of the days that we were at the loading zone of New Thompson (renamed Eliason Harbor). Some days we had a storm of people getting eggs from both boats. After the rush of people slowed to a sputter and then eventually stopped, Steve Demmert ran the eggs to other communities and met their subsistence needs of herring eggs beyond Sitka's. From what we had Sitka, we returned thousands of pounds of live herring eggs that had not been taken, back to the ocean so they could start their life cycle. Subsistence was important for my family's life style whether it came from the water or the land. And for me as the nephew of the late Alfred George Perkins, and grandson of the late Raymond Charles Perkins (brothers) who both were subsistence providers for communities/families around southeast Alaska for most of their lives, and I'm sure the State from what I can gather from my family. Because of my lineage and also being an enrolled member of STA, it's monumentally hard for me to disagree with STA's statements, but I do disagree about the needs not being met. Based on what we were able to harvest for the communities it showed there are plenty of eggs available. I think it is a lack of effort to harvest what is needed. Herring eggs have always been available; getting out there to get them is a different story. Equipment is also a factor but I know many people with the power boats, and know how on both sides of the fence that would help to make sure that the community gets there subsistence needs met. My uncle Alfred Perkins was not only the Kiksadi clan leader (19 years) here in Sitka but was also a commercial fisherman for many years, and from what I have heard from some of my family members is that he participated in both the herring fishery and gathering herring eggs for the community/families before I was born. And for me to be able to follow in his and my families footsteps as subsistence providers means a great deal to me.

I am opposed to closing any of the Core Area as it is unnecessary. So I hope you consider this letter testimony in response to the proposals.

Sincerely, Charles Backus
F/V Reiver



Dennis Houston
3208 Halibut Pt Rd
No. 30
Sitka, Alaska 99835

January 30, 2012

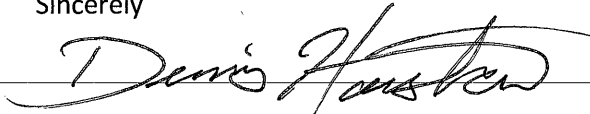
Re: Support Status Quo for Sitka Sound Sac Roe Herring Fishery

Dear Chairman Johnstone and Board of Fish Members,

I have lived in Sitka for 27 years and am a STA tribal citizen. I was born and raised here and I have commercial fished for ten years. Fishing is my livelihood and I support myself, as well as my fiancé and child, due in July. I depend on the sac roe fishery and Hoonah Sound herring pound fishery. I believe commercial fishing supports most of the communities in coastal Alaska, as well as many families. I do not support withdrawing any part of the core area from the fishery.

The herring fishery is important to me and my family and my community of Sitka. The herring fishery does not interfere with the subsistence fishery and they can exist side by side.

Sincerely

A handwritten signature in cursive script that reads "Dennis Houston". The signature is written in dark ink and is positioned above a horizontal line.

Dennis Houston

RECEIVED
FEB 02 2012
BOARDS

RECEIVED

FEB 2 2012

BOARDS

February 1, 2012

**Bill Glenovich
3889 James Street Road
Bellingham, WA 98225**

**Alaska Board of Fish
PO Box 115526
Juneau, Alaska, 99811-5526**

Dear Chairman Johnstone and Board Members,

Re; Adopt proposal 285, Repeal the 58ft limit in Southeastern Alaska.

I have purse seined salmon and herring in Alaska for over 50 years. I have recently slowed down, selling my 58ft purse seiner and participate only in the Sitka Roe Herring fishery. I have noticed we have a lot of boats fishing herring in Sitka that are of different lengths. They range in length from short, 40-42ft, Kodiak fishermen, to over 75ft. All are out each opening and all are in each other's way trying to catch their share.

The larger boats don't have any advantage. The big sets a few years ago were caught by the smaller boats because they were shallower and got into where the fish were. The smaller boats with smaller nets caught the big sets up to 1500- 1600 tons in one set. Some of the boats have two engines of over 1,000 hp each. These boats set so fast they sometime crash into each other. Everyone is fishing the boat with the size and power they want. All are playing by the rules in the fishery. The boat length has never been an issue.

I am sure, if the 58ft rule in the SE Alaska Salmon Fishery were abolished it would be like the herring fishery. Everyone would have a choice to fish whatever length and size boat works best for them and the length of their boat would be no issue.

Best regards,

Bill Glenovich



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

February 6, 2012

RECEIVED
FEB 02 2012
BOARDS

Dear Chairman Johnstone,

My name is Sarah Jordan. I have trolled salmon in SE Alaska since 1973. In 1990 my family pioneered the round chum troll fishery in Sitka Sound after 2 years of delivering dressed chums to Sitka Sound Seafoods.

I support adoption of proposal #325 to establish a management plan for and expansion of the June Icy Straits chum troll fishery.

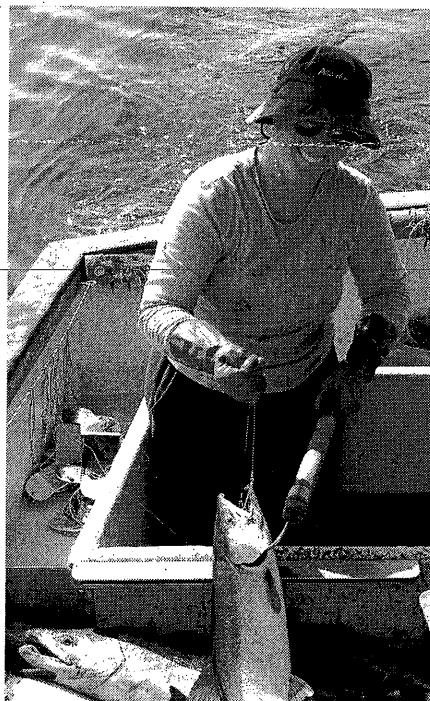
This fishery is very important to the success of our small family business. It allows me to work on the boat without being seasick. We are able to hire our son to crew with us during his summer break from teaching school. I look forward to being able to train and hire my grandchildren in the future.

As a small business owner myself, I welcome the opportunity to help the businesses in Hoonah while we fish in Icy Straights. During the 20 days we fished in Icy Straits in 2011, we spent over \$3000 for fuel, groceries, gear, taxis and moorage in Hoonah.

I once flew into Hoonah to surprise my family and join them on our boat. No restaurants or businesses were open on that Sunday afternoon. After standing out in the pouring rain for several hours waiting for our boat to dock, I noticed a volunteer youth group from Kansas who were working at the Presbyterian Church. They graciously let me join them so that I could get in out of the rain. Today there are several restaurants where one can get in out of the rain.

Sincerely,

Sarah Jordan
Sarah Jordan
103 Gibson Place
Sitka, AK 99835



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

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FEB 07 2010
BOARDS

Dear Chairman Johnstone and Board members,

As the owner/operator of a commercial troll vessel for 36 years I understand the importance of the Board of Fish (BOF). Taking a few minutes to express my support of proposition 325 and 326 is a small price to pay for such an important event. The BOF was established, in part, to hear comments from fishermen, as we are the vanguard to these regulations that protect our resources and our livelihoods, and I appreciate the opportunity.

As a small boat owner I particularly utilize the hatchery salmon which afford me the chance to fish calmer waters. I, and many of my colleagues, particularly those with families on board, can often fish close to shore and close to home in these fisheries. This is true for the newly developing fishery for chums in the Icy Straits area which these two proposals address.

Also included in my preferences for this fishery are:

1. The low by-catch of other salmon species. For the fifteen or twenty years I have been targeting chums I have found I can overwhelmingly control what I catch.
2. The ever increasing cost of trolling affects my profits and chum fishing is the one species that requires one third the fuel than that of other troll species.
3. Trollers have been paying in to our enhancement programs for some fifteen or more years now and we as a gear group are well and truly below our allocation. I am hopeful that these additional areas will help to relieve us of some of the pressure of paying for fish we do not get to catch.
4. It greatly helps ALL trollers by spreading out the effort by relieving pressure on the spring king hatchery programs as well as the major king opening in July.

Having participated in fishing Icy Straits for the past two Junes, I see the vulnerability of this fishery. Although this area is worth hundreds of thousands of dollars to trollers it could easily be shut down due only to the lack of a management plan. That is why I believe these proposals are so important. Please closely consider these plans that could go a long way in solving some of the problems that exist.

One final note, I am opposed to proposition 312. There does not seem to be any good science to support the thought that a mandatory 10 day coho closure would benefit the species.

Sincerely,

Linda Danner
F/V Amberjack

This comment is on proposals 285 and 286 which I oppose. The 58 foot limit may be artificial but it has been in place a long time and has worked. If its not broken, why fix it? It is claimed that allowing larger vessels will allow on board value added processing. This is a ridiculous claim and no one takes it seriously, even the authors of these proposals. The fleet that exists now is capable of efficiently harvesting any conceivable run. The only logic to discontinuing the limit, is to eventually concentrate the fishery in a much smaller fleet of much larger more highly capitalized vessels employing significantly fewer fishermen. I don't believe there would be anything gained and much lost by this change.

Jim Zuanich
F/V Marshal Tito

RECEIVED
FEB 02 2012
BOARDS

Richie Davis
2347 Kevin Court
Juneau, AK 99801

February 6, 2012

Attn: Board of Fish Comments
Boards Support Section
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

RECEIVED
FEB 02 2012
BOARDS

Hello Chairman Johnstone, and Alaska Board of Fisheries Members,

I'm Richard Davis of Juneau, Alaska as well as being a lifelong Alaskan Resident Angler for the past 45 years. The commercial fisheries of Southeast and the Eastern Gulf of Alaska have sustained myself and my family. All of my income is obtained from participation in the commercial salmon, halibut, blackcod and misc. bottom fish harvest. I and 2 of my young adult sons are still reliant upon healthy, vibrant commercial harvest opportunities.

I strongly **OPPOSE** Proposals 212, 216, 217, 220 & 221 All lingcod allocation change proposals should be stringently resisted. Tremendous effort from all user groups, F&G Advisory Committees, and the Dept culminated in a consensus management plan, complete with allocations, adopted in the mid-nineties by the Board of Fish. The regionally comprehensive resultant plan for lingcod harvest allocation needs to be preserved, and not revised or undermined by the desire of a single user group or individual.

I also OPPOSE Proposals 250, 251, 255, 260, 261, 274, 277, 278, 279, 299, 310, 312, 320, 323, and 324.

I SUPPORT Passage of Proposals 215, 224, 253, 269, 284, 308, 311, 328, 330, 334, 335 & 334.

Sincerely,



Richie Davis

4 Nickerson, Suite 400, Seattle, WA 98109
P.O. Box 31179, Seattle, WA 98103-1179
PHONE (206) 726-9900 FAX (206) 726-1667
www.northpacificseafoods.com



ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

RECEIVED

FEB 02 2012

BOARDS

Dear BOF and Boards Support,

This letter is in support of the Chum Trollers Association (CTA) Board of Fisheries (BOF) Proposals # 325 and # 326. Our company, Sitka Sound Seafoods, a subsidiary of North Pacific Seafoods Inc, has been processing salmon for fifty plus years in SE Alaska. Sitka Sound Seafood pioneered the purchasing of round troll pinks and chums beginning in 1990. High quality round chum and pink salmon troll deliveries continue to be important to our company.

We have read proposals 325 and 326 and agree with CTA that passage of BOF proposals 325 and 326 will facilitate orderly development and management of the chum troll fishery.

The details of the SE enhanced salmon allocation plan and that trollers are well below their allocation, over \$4 million short in 2011, are well known to us. We understand that as a long-term policy CTA would rather not see hatchery salmon taken from another gear group but development of existing and creation of new opportunities for the troll fleet. We agree with that approach as we buy salmon from other gear groups. We understand these proposals are carefully chosen not to displace any other gear group but to allow better troll access to hatchery chums.

Trollers have proven they can effectively catch chums at multiple sites. In 2011 ADF&G reports indicate trollers harvested over 680,000 chums in SE Alaska for an estimated ex-vessel value of over \$4 million. In Icy Straits in 2011 estimates are that trollers harvested 175,000 chums and 345,000 pinks for an estimated value of over \$1.6 million.

Proposal 325, as amended by the SE enhanced salmon Joint Regional Planning Team (JRPT) proposes a chum troll management plan for Icy Straits where trollers are currently targeting hatchery chums under Chinook hatchery management and on the North West Admiralty shore where there are known concentrations of hatchery chums in late June. The JRPT has endorsed this proposal with amendments we support.

Proposal # 326 proposes a chum troll fishery in a small part of District 11A the first 20 days of July. We think this proposal will provide increased troll opportunity on enhanced chum salmon and will improve access for trollers in the Juneau area. Troll harvest of these hatchery chums, now that Douglas Island Pink And Chum is retiring its debt, brings trollers closer to their share of enhanced salmon value and moves a good percentage of these troll caught chums into processors around SE Alaska.

Sincerely,


John Baird

General Manager Sitka Sound Seafoods

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(907) 486-5164

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Attn: BOF Comments

Board Support Section

Alaska Department of Fish and Game

P.O.Box 115526

Fax: 907 465-6094

Attn: Shannon Stone

Dear Chairman Johnstone and Board of Fish Members,

This letter is in Opposition to Proposals 230, 231, 232, 238, & 239; and In Support Proposal 273

Oppose Proposal 230 – apply ecosystem management to Sitka Sound herring management.

The current ADF&G management plan is not limited in scope and relevance, quite the contrary. It is extremely thorough in real time visual (mammal, and bird activity) and acoustical information (from the ADF&G research vessel), as well as dive surveys to measure spawn density, spawn substrate, spawn depth and quality of spawn. The department and their team have done an outstanding job of managing the resource and maximizing opportunity for all user groups. The current harvest rate of 20% is very conservative and certainly biologically defensible. This proposal has no merit.

Oppose Proposal 231 – require ADF&G management to shutdown Sitka Sound herring fishery when GHL is within 10% of harvest quota.

The ADF&G again has done an exemplary job of managing the Sitka Sound Herring Fishery. It has been under the harvest quota by 2% in the past 10 years! The latest historical data, and spawn deposition, show the biomass has been underestimated in 10 of the last 12 years. With this in mind, the harvest quota could have been even higher considering the current conservative 20% harvest rate. Managing to such a degree with this accuracy considering all of the area, and needs of all users should be commended. The consideration they have put forward in personal and professional understanding of the needs of each user group, along with the high degree of technically trained scientists is one we should be proud of. The outstanding health of these herring stocks for future generations is a testament to the department and their excellent management practices.

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(907) 493-5331
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should be proud of. The outstanding health of these herring stocks for future generations is a testament to the department and their excellent management practices.

Oppose Proposal 232 – change harvest formula from 2 + 8 (spawning biomass in tons/25,000) to 8 + 2 (spawning biomass in tons/25,000)

The 2 +8 formula used by ADF&G in Sitka Sound is conservative for its large population size. In ten of the past eleven years the 2+8 formula resulted in a 20% harvest rate, and during that same time period the population has grown from an estimated 53 ton biomass to 145 tons! ADF&G has been very diligent in seeking outside consultants and experts to review their ASA models and recommendations.

There is no biological basis for changing the formula.

Oppose Proposals 238 & 239 – Establish subsistence only harvest in Core area - Makhnati to Gavanski to Crow Is. to Halibut Pnt., along roadside to breakwater.

There is no information to support that the subsistence opportunity has been diminished in recent years. Considering the increasing stock abundance and spawn distribution, it is more likely that the subsistence opportunity is greater than it has been since ADF&G began managing this resource.

ADF&G has been extremely understanding of the need to provide opportunities to the subsistence harvesters, and giving reasonable opportunity to harvest roe on branches. This is most notable with the vast majority (some 80%) of the sac roe harvest being taken outside the “Core Area” from 2002 to 2010! Staying out of the core area is not always possible considering the nature of spawning patterns from year to year; however ADF&G prioritizes in trying to minimize the harvest in this area while still providing opportunity to prosecute a sac roe fishery.

The “perceived” lack of subsistence harvest is more realistically a function of reduced effort and participation, weather, and spawn distribution. Considering these parameters, there are groups and individuals that have in the past and will in the future, assist in helping meet the needs when traditional means might fall short.

The subsistence needs can be met with the current sac roe fishery management plan.

Support Proposal 273 – Establish an accounting system for herring egg harvest in Sitka Sound through permit or sampling program.

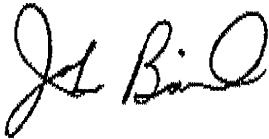
There is no current meaningful accounting system for monitoring the harvest of herring eggs on branches. Mail in “household” surveys is not reliable. Considering the nature and importance for both subsistence and sac roe harvesters, the need for accurate, transparent and science driven data, is

imperative for accurate analysis to predict biomass of the Sound. The ADF&G could have dockside surveys where samplers would interview harvesters and use survey methodology such as weight, size, harvest methods and numbers of harvesters.

This should not be considered an affront to the subsistence users, as there are other current programs such as subsistence halibut where permitting is required. Rather this would be a scientific and transparent measure to help in management practices to insure future sustainability.

Thank you for your time and the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "John Baird". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John Baird

General Manager

Sitka Sound Seafoods

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February 5, 2012

Attn: BOF Comments

Board Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Fax: 907 465-6094

Attn: Shannon Stone

Dear Chairman Johnstone and Board of Fish Members,

My name is John Baird, I am the General Manager at Sitka Sound Seafoods, a subsidiary of North Pacific Seafoods Inc. I reside in Sitka at 713 Katlian St. in Sitka and have been an Alaska residence for some 36 years.

First let me say, Thank you for your time and commitment acting on this board, and secondly to my opportunity to comment here. I have submitted written testimony speaking against Proposals 230, 231, 232, 238 & 239. And In Support of Proposal 273

My comments to follow are a general summation for my positions.

I have been involved in many Alaskan fisheries, starting at age 18 as a fisherman, and now working on the processing side for some 26 years. I have lived in Southeast Alaska and been directly involved in the Sitka Sac Roe fishery for 17 years as a fleet and Plant manager. My wife and I raised two children in Petersburg, both of whom have worked in the fishing industry and specifically in the Sitka herring fishery on tenders. We count ourselves lucky to have had the opportunity to see this herring fishery come from meager biomass and catches to extraordinary biomass and catches in those 17 relatively short years. I think this tremendous volume of fish we are seeing is a true testament to the ADF&G and their science, management, and model, in the health of the ecosystem in Sitka Sound today.

Unfortunately this management team and its obviously successful program (of which you will see, plenty of scientific data to back it up) is being put into question by proposals and formulas (230, 231, 232) that have no biological basis and would depart, as I said previously from a program that is working well!

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Furthermore, proposals (238 & 239) to establish a subsistence only harvest in the "core area, show no information to support that their subsistence opportunity has been diminished in recent years. Considering the increasing stock abundance and spawn distribution, it is more likely that the subsistence opportunity is greater than it has been since ADF&G began managing this resource. Only 20% of the quota has been taken between 2002-2010 in this "core area" The department has been extremely understanding of the need to provide opportunities to the subsistence harvesters and to deny this is just plain wrong. From its inception to its end, I had the opportunity to serve as the processor liaison on the herring task force committee comprised of ADF&G, STA, Seiners, and Processors associated with the MOA (memorandum of understanding) and fishing information given to STA before each opening. ADF&G was always considerate in these meetings of the needs and opportunities for the subsistence harvesters. The "perceived" lack of subsistence harvest is more realistically a function of reduced effort and participation, weather, and spawn distribution. Considering these parameters, there are certainly groups and individuals that have and will in the future, assist in helping meet the needs when traditional means might fall short.

What will diminish if these proposals go through is the lack of viability of the sac roe fishery and all the economies that are tied to it. Having the opportunity to fish the "core area" at times is absolutely necessary. Taking this area and opportunity away from the sac roe fishery marginalizes the opportunity to supply markets. If you can't supply the markets you lose the markets, if you lose the markets you lose jobs... lots of jobs! You have heard testimony and will hear additional testimony with more detail in the economies of this fishery. Sitka Sound employs upwards of 50 local folks, as well as some from neighboring villages, and you will hear of even larger employee numbers from other plants in the region. Additionally and in even greater numbers will be jobs lost from seine and Tender operations, fuel companies, grocery stores, fishery supply stores, Motels, packaging manufactures, the list goes on and on. Those are just the jobs lost, now try and imagine all the lost revenue from these businesses and the number is staggering.

Dave Gordon and all the staff that manage this fishery have done an outstanding job in their hard work, professionalism, and consideration for the all users of this resource. They have indeed carried out the state of Alaska mandate to "manage the resource sustainably and to maximize benefit for all the people of Alaska".

I strongly urge you to let them continue this work using their methodology that has brought this success.

Again, Thank you for your time and the opportunity to comment. I plan on being here for the duration of the meetings and look forward to having the chance to visit with you again, and I would also appreciate your consideration to serve on any committee that discusses these proposals.

Sincerely,

John Baird

General Manager Sitka Sound Seafoods

ATTN: BOF COMMENTS

Boards support section

Alaska DF&G

PO Box 115526

Juneau, AK 99811-5526

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FEB 06 2012

BOARDS

Mr. Chairmen and Board

My name is Mark Roberts . I have been living in Petersburg and trolling in Southeast for the last 33 years.

I'm here to talk about proposals 310, 311, and 312.

Proposal 310 This proposal would result in the Alaska hatchery fish caught in the winter fishery not being counted towards the 45 thousand fish winter fishery cap. This would put about 4-5 thousand more fish into the winter fishery, bringing the total winter fish count up to 49 to 50 thousand fish. . The reason why a lot of us are against this, is because we have already done a lot to help the winter fishery maximize its potential..

The Board of Fish moved the winter fishery April 15th closure date to the 30th . This I know has really helped to extend the winter fishery. Trollers knew when the Board of Fish passed this, that the winter fishermen would then almost always catch the entire winter quota of 45,000 fish—They knew those fish would not be available to the fleet in the summer fishery.

The Chinook Troll Task Force, created by the Board of Fish in 1993, structured the fishery as we know it today. They were told by the Board to strive for a minimum 10 day king opening in the summer, with a goal of 20 days . Their reasoning was to keep down the incidental mortality of king salmon during the coho fishery after the Chinook quota was harvested. If we keep taking from the summer fishery the 10-20 day opening will be hard to accomplish. Remember that the quota was recently cut another 15% and that's coming out of the summer season.

Another one of the arguments used by 310's proposers is the winter fishery's high price. In the last two weeks of April the catch rate increases dramatically. Which customarily floods the fresh fish market and brings the prices down comparable to the summer prices. Consequently there is not a big difference between the summer and winter prices in the last two weeks in of the winter fishery. If anything, adding 5 thousand fish at the end of this season time could drive the prices even lower.

During the last two weeks of April the Sitka and Yakutat areas catch the majority of the fish. So this proposal would mostly benefit the fisherman living in these two communities more than the remaining Southeast troll fleet. The summer fishery on the other hand spreads benefits throughout the entire troll fleet, because the fish are dispersed throughout all of Southeast by that time..

Again, we have done a lot for the Winter fishery and now we need to keep the Summer fishery in good health... The current Chinook management structure the Task Force put

together for us is working for everyone.

Proposal 311

We are asking to move the coho season opening from June 15 to June 1. So during the spring troll fisheries we can retain the incidental hatchery coho while fishing for hatchery king salmon. These hatchery access areas are located mostly on the inside waters and a long way from the big off shore schools of wild coho. and fish and game says there is no biological reason for the June 15 opening date. Allowing us to keep early coho could be another way to help trollers gain on the allocation imbalance. Again we are only asking to move the coho opening date up two weeks, so we can catch early hatchery coho in the spring troll fishery areas.

Proposal 312

This proposal would require a mandatory 7-10 day closure in August. The gillnetters say the department has failed to provide adequate fish for escapement and the inside users. You just need to look at the data and you will see that the fish and game have done their job. The Department has met or exceeded its escapement goals for coho. . We don't need to tie the managers hands with this regulation . The department has done a remarkable job of deciding what length of closure is needed each year to address both conservation and the board allocation goals to both trollers and gillnetters .So, the 7 to 10 day mandatory is not necessary. Let the department do their job .

Mark Roberts

Mark Roberts

2/6/12

F/V Cape Cross

Po Box 246

Petersburg AK 99833

NORTHERN

(907) 747-6850

FAX (907) 747-1470

EMAIL steve_reifenstuhl@nsraa.org**SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

1308 Sawmill Creek Road Sitka, Alaska 99835

January 11, 2012

Board of Fisheries
February 24 – March 4, 2012

Re: Support for Southeast Proposals 328, 330, 335, 342, 343, and 344

Dear Chairman Johnstone and Board of Fish Members:

Northern Southeast Regional Aquaculture Association (NSRAA) submitted five (5) proposals which we continue to support fully, although proposal 342 needs a slight modification addressed below; and we also support the Joint RPT proposal 335 and ADF&G 343 both of which involve NSRAA programs.

NSRAA Proposal 328 – broodstock capture using leads and net pen was tested successfully in 2011 and NSRAA would like the board to adopt this proposal into regulation.

NSRAA Proposal 330 – NSRAA has used the proposed line demarcation for the past three years to segregate commercial troll from sport users at Bear Cove, Silver Bay adjacent to the Medvejie Hatchery. Adopting this proposal would eliminate the need for using ADF&G E.O. authority for annual implementation. The effect has been positive in reducing conflicts, reducing treble hooks tangled in beach seines, reduced foul hooking, and created a more family friendly atmosphere for all users.

Southeast Joint Regional Planning Team Proposal 335 – NSRAA originally proposed this management plan in 2008 for the '09 board cycle which was then endorsed by the JRPT. NSRAA has successfully managed Deep Inlet using this management plan for three consecutive years; the 1:1 ratio between gillnet and purse seine has shifted more chum salmon to the seine fleet which was the desired effect.

NSRAA Proposal 342 – State of Alaska legislation in 2006 enacted the provision for implementation of a tax on enhanced salmon in terminal harvest areas for the purpose of collecting cost recovery revenues. The Departments of Revenue, Fish & Game, and Law have met with NSRAA to enact regulations in this matter. In order for NSRAA to utilize this option in a terminal harvest area (THA) the Board of Fish would need to authorize the 'tax option' as a method. It is my understanding that Department of Law has briefed the Board on this issue.

The original proposal was submitted as a registration fishery based on an early recommendation by ADF&G, however after further consideration, ADF&G and NSRAA agree implementation of the tax should be conducted and regulated by designating specific boundaries to the terminal area which have been used historically through the past twenty-five years. In this case it would be allowed as a tool in the Hidden Falls Terminal Harvest Area as defined by ADF&G openings and criteria.

ADF&G Proposal 343 – Housekeeping proposal to allow the coho fishery to continue in the Hidden Falls THA during the general season coho closure. Hidden Falls terminal area has been opened in this fashion the past several years through E.O. The JRPT consensus agreement supports this proposal.

NSRAA Proposal 344 – the NSRAA board authorized this proposal which modified the existing management plan slightly to allow more area for trollers in May and June to increase Chinook catch. The JRPT supports this proposal in the consensus agreement.

I would like to serve on committee with regard to these proposals if the board deems committee work necessary.

Sincerely,

A handwritten signature in black ink that reads "Steve Reifentuhl". The signature is fluid and cursive, with the first name "Steve" and last name "Reifentuhl" clearly legible.

Steve Reifentuhl
General Manager
Northern Southeast Regional Aquaculture Assoc.

PROPOSAL 341 - 5 AAC 33.3XX. New Section. Establish a THA in Southeast Cove for seine and troll gear as follows:

As per agreement reached with JRPT at the April 6, 2011 meeting KNFC/GCH would like to propose a THA mirroring our SEC SHA along with the accompanying Salmon management plan. Wording for proposed regulation would read as follows.

District 9: Southeast Cove Terminal harvest Area Salmon management Plan. (a) The intent of this management plan is to distribute the harvest of hatchery-produced salmon in the area described in (b) of this section between the purse seine, and troll fleets.

(b) The department, in consultation with Kake Non Profit Fisheries Corporation (KNFC), Shall open and close, by emergency order, fishing seasons and periods to manage waters of Southeast Cove and adjacent waters which consist of the waters of Keku Strait enclosed by a line from a rocky point on the northern end of Kuiu island located on the east side of Southeast Cove at 56° 52.95' N. lat., 134° 01.33' W. long. to the northwest, corner of Hound Island at 56° 53.12' N. lat., 133° 56.77' W. long. Then northwest, connecting points along the northern shore of Keku Islands at 56° 53.98' N. lat., 133° 57.58' W. long. to 56° 54.90' N. lat., 133° 59.53' W. long. to 56° 55.93' N. lat., 134° 00.97' W. long. to 56° 55.95' N. lat., 134° 02.15' W. long. to 56° 55.22' N. lat., 134° 02.53' W. long. to 56° 56.37' N. lat., 134° 06.62' W. long. then to the northwest corner of Payne island 56° 57.45' N. lat., 134° 08.75' W. long. then south to a point on Kuiu Island at 56° 55.08' N. lat., 134° 09.25' W. long., as follows:

(1) Salmon May be taken by seines and troll gear only during periods established by emergency order as follows: Openings for seines will be on Sundays following four consecutive days (Mon - Thus) of cost recovery harvest and two build up days (Fri and Sat) until set cost recover goals are met.

(A)The department, in consultation with KNFC. shall close fishing between openings; openings will be abundance based

(2) salmon may be taken by troll gear when the waters described in this sub section are closed to commercial net gear;

(3) the commissioner shall close the seasons in the waters described in this subsection to trolling during hatchery cost recovery periods.

(4) As per agreement with seine fleet at April 6, 2011 Joint Regional Panning Team meeting (JRPT) all fish caught within the waters described in this subsection will be charged a cost recovery assessment tax. (Similar to Hidden Falls).

ISSUE: As per agreement reached with Southeast Joint Regional Planning Team (JRPT) at the April 6, 2011 meeting Kake Non Profit Fisheries Corporation / Gunnuk Creek Hatchery (KNFC/GCH) would like to propose the formation of a Southeast Cove (SEC) Terminal Harvest 325

Area (THA) mirroring our current Special Harvest Area, along with an accompanying SEC THA salmon management plan.

WHAT WILL HAPPEN IF NOTHING IS DONE? Trollers and seiners (primarily seiners) would continue to have a difficult time catching the 60% Gunnuk Creek Hatchery enhanced chum salmon. As per the performance goals set by the Southeast Alaska Allocation task force.

Gunnuk Creek Hatchery with its 65 million permitted capacity of enhanced chum salmon playing a major role in bringing back seiners and trollers back within their allocations may be lost.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Seiners and trollers who will be able to get closer to their respective allocations. KNFC would be meeting the performance goals set by the SATF. The Community of Kake which may see a positive economic impact from having the fleets stop into the town

WHO IS LIKELY TO SUFFER? Only those in Kake who would see a public resource as their very own.

OTHER SOLUTIONS CONSIDERED? There were no solutions that could address the need of meeting the 60% common property contribution and cost recovery needs without negatively affecting the other negatively other than this one.

PROPOSED BY: Kake Non-Profit Fisheries Corporation (HQ-F11-119)

PROPOSAL 341 - 5 AAC 33.3XX. New Section. Establish a THA in Southeast Cove for **net (purse seine, gill net)** and troll gear as follows:

As per agreement reached with JRPT at the April 6, 2011 meeting KNFC/GCH would like to propose a THA mirroring our SEC SHA along with the accompanying Salmon management plan. Wording for proposed regulation would read as follows.

District 9: Southeast Cove Terminal harvest Area Salmon management Plan. (a) The intent of this management plan is to distribute the harvest of hatchery-produced salmon in the area described in (b) of this section between **the net (purse seine , gill net)**, and troll fleets.

(b) The department, in consultation with Kake Non Profit Fisheries Corporation (KNFC), Shall open and close, by emergency order, fishing seasons and periods to manage waters of Southeast Cove and adjacent waters which consist of the waters of Keku Strait enclosed by a line from a rocky point on the northern end of Kuiu island located on the east side of Southeast Cove at 56° 52.95' N. lat., 134° 01.33' W. long. to the northwest, corner of Hound Island at 56° 53.12' N. lat., 133° 56.77' W. long. Then northwest, connecting points along the northern shore of Keku Islands at 56° 53.98' N. lat., 133° 57.58' W. long. to 56° 54.90' N. lat., 133° 59.53' W. long. to 56° 55.93' N. lat., 134° 00.97' W. long. to 56° 55.95' N. lat., 134° 02.15' W. long. to 56° 55.22' N. lat., 134° 02.53' W. long. to 56° 56.37' N. lat., 134° 06.62' W. long. then to the northwest corner of Payne island 56° 57.45' N. lat., 134° 08.75' W. long. then south to a point on Kuiu Island at 56° 55.08' N. lat., 134° 09.25' W. long., as follows:

(1) **Salmon May be taken by net (Seine, gill net)** and troll gear only during periods established by emergency order as follows: Openings for **net gear** will be on Sundays following four consecutive days (Mon - Thus) of cost recovery harvest and two build up days (Fri and Sat) until set cost recover goals are met.

(A)The department, in consultation with KNFC. shall close fishing between openings; openings will be abundance based.

(B) Rotation between net gear groups (seine, gillnet) will be allocation based, taking into consideration recommendations from the Joint Regional Planning Team (JRPT).

(2) salmon may be taken by troll gear when the waters described in this sub section are closed to commercial net gear;

(3) the commissioner shall close the seasons in the waters described in this subsection to trolling during hatchery cost recovery periods.

(4) As per agreement with seine fleet at April 6, 2011 Joint Regional Panning Team meeting (JRPT) all fish caught within the waters described in this subsection will be charged a cost recovery assessment tax. (Similar to Hidden Falls).

ISSUE: As per agreement reached with Southeast Joint Regional Planning Team (JRPT) at the April 6, 2011 meeting Kake Non Profit Fisheries Corporation / Gunnuk Creek Hatchery (KNFC/GCH) would like to propose the formation of a Southeast Cove (SEC) Terminal Harvest 325 Area (THA) mirroring our current Special Harvest Area, along with an accompanying SEC THA salmon management plan.

WHAT WILL HAPPEN IF NOTHING IS DONE? Trollers , seiners **and gill netters** (primarily seiners) would continue to have a difficult time catching the 60% Gunnuk Creek Hatchery enhanced chum salmon. As per the performance goals set by the Southeast Alaska Allocation task force.

Gunnuk Creek Hatchery with its 65 million permitted capacity of enhanced chum salmon playing a major role in bringing back seiners and trollers back within their allocations may be lost.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? No.

WHO IS LIKELY TO BENEFIT? Seiners, **gill netters** and trollers who will be able to get closer to their respective allocations. KNFC would be meeting the performance goals set by the SATF. The Community of Kake which may see a positive economic impact from having the fleets stop into the town

WHO IS LIKELY TO SUFFER? Only those in Kake who would see a public resource as their very own.

OTHER SOLUTIONS CONSIDERED? There were no solutions that could address the need of meeting the 60% common property contribution and cost recovery needs without negatively affecting the other negatively other than this one.

PROPOSED BY: Kake Non-Profit Fisheries Corporation (HQ-F11-119)

Dear Board of Fish:

I am a commercial salmon troll permit holder and am writing with regard to Proposal 312. Proposal 312 would remove ADF & G's discretion to have short mid-August troll closures that enable the troll fleet to increase overall fishery value in years of moderate to high abundance. I oppose Proposal 312. Proposal 312 is a thinly veiled attempt to disguise an allocative measure as a conservation measure.

The issue, according to the United Southeast Gillnetter's Association (USGA), is that the annual troll closure is ambiguously applied and USGA suggests that outside coast troll fisheries compromise inside fisheries as well as stock conservation. USGA provides no scientific or statistical support for either proposition. ADF & G always considers coho abundance in determining the length of the troll closure. When there is sufficient abundance, ADF & G implements a short closure of 4 to 5 days so that the troll fleet can maximize its fishing opportunities.

I fish both the outer coast and inside waters and depend on coho salmon. My operation is representative of many trollers. I fish the summer season and every available fishing day is important to my operation. I make five day trips and typically deliver my fish into Sitka. The cohos in August when the closure occurs are of sufficient size that the USGA proposal actually would reduce the quality of the resource harvested by reducing the percentage of 7 pound and up fish that are the most valuable to the troll fishery. Additionally, the USGA proposal basically eliminates one trip from the annual summer troll fishery. This has tremendous significance. Depending on the price, a decent five day troll coho trip can be worth around \$5,000 to an ice boat and twice that much to a freezer vessel. This loss is statistically significant across a fleet of hundreds of vessels that rely on the outer coast troll fishery. For example, ex-vessel revenues would decline by a million dollars if the proposal removes the equivalent of one decent fishing trip opportunity from just one-hundred ice boats and fifty freezer boats. This does not include related losses in processor profits and lost raw fish tax to troll dependent communities. The ability to maximize access to the coho resource when supported by abundance is important to thus not just the profitability of my own business but also the ability of processors to maintain market share and maximize employment and economic ripple effects in troll fishery dependent communities. Therefore, from economic standpoint, Proposal 312 is unfair, unreasonable and just plain bad business.

Further, under the relevant statutory factors set forth in the Alaska Statutes for allocating fishery resources, the Board of Fish must consider the history of the fishery, the number of residents and non-residents participating, that availability of alternative fishery resources, the importance of the fishery to the state's economy and the importance of the fishery to the regional and local economy. The troll fishery has depended on access to the coho resource for decades and typically involves over 800 permit holders annually who employ one or two crew per vessel. It is particularly important in ports like Pelican, Sitka, Craig and Port Alexander and the Board should specifically recognize detrimental economic impacts to these communities that would flow from Proposal 312's intent of eliminating one troll trip per year for the wildly speculative benefit of Juneau gillnetters who have numerous alternative fishing opportunities.

This is simply unfair and is equivalent to directing USGA members to not fish for one of the most critical weeks of their season in order to achieve some speculative benefit to another user group that has ample alternative fishery opportunities. This is strictly an effort by one gear group to allocate the coho resource to itself under the misguided and unsupported assumption that eliminating an annual trip from the troll fleet in moderate to high abundance years would actually result in such a re-allocation. When fish are abundant on the outer coast, they will be abundant in inside waters. When there is low abundance, ADF & G will implement the longer closure under existing regulations. I have trolled for nearly two decades and believe that ADF & G's implementation conservation closures had been consistent and appropriate. There is no need to disturb this balance at this time or to remove the agency's discretion to ensure that the troll fishery maximizes its economic contribution to the region when biologically appropriate.

Please deny Proposal 312.

Paul C. Olson

Paul Olson

PO Box 55
Tenakee, AK 99841
27 Dec 2011

BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

RECEIVED
DEC 30 2011
BOARDS

Dear Board of Fish Members:

Several months ago I received from ADFG a rather hefty booklet containing a number of proposals. It is my understanding that you will be considering each of those proposals at some point in the near future. I offer each of you my thanks (and condolences) for expending the energy to wade through all of those proposals. I have only skimmed through the booklet, but there were a number of proposals that caught my attention. I hope my comments are of some value to you in helping you measure how these proposals could affect Alaskans and in deciding which proposals are worthy of adoption.

For the record, I am an Alaskan resident. I am also a commercial fisherman. Sometimes I am also a sport or subsistence fisherman. I live in rural southeast Alaska.

PROPOSAL 140 - Harvest record required; annual limit

I agree with the general thrust of this proposal. As a commercial fisherman, I have been concerned for some years that recreational harvest levels of many species are unknown. I believe something similar to this proposal is already being done in some places (for example, for red king crab in the vicinity of Juneau).

At the same time, I am concerned about mandating the ADFG do this for every species of shellfish as that might be costly and could be unnecessary for some underutilized species.

It is unclear to me whether ADFG already has the authority to require recreational catch reporting on a discretionary basis or whether they require Board of Fish authority for each species. If not, I would encourage you to extend them that authority so that such arrangements can be made in the future on an immediate basis, however, I'm reluctant to see them forced into requiring a reporting system.

PROPOSAL 145 - Reducing shrimp pot limit for sport shrimp fishery

Support. With the bag limit being reduced there is no need to allow so many pots. The bag limit was reduced by 70%. If adopted the pot limit would only be reduced by 50%. Would cut back on mortality and "temptation."

PROPOSAL 148 - Reallocation of king crab in Section 11-A (Juneau area)

Oppose. I see no compelling reason for such a reallocation. Both personal use and commercial fisherman share responsibility for the state of the resource in this district. Reallocating to personal use fishers is not likely to improve the health of the resource. Any additional crab freed up by such action will be caught by personal use fishers. They won't survive to procreate.

PROPOSAL 152 - Allow equal quota harvest for red king crab commercial fishermen below certain biomass threshold

I am not a crab fisherman, but I would be concerned about the potential legal problems with something that basically sounds like an IFQ system. Or maybe I misunderstand the proposal.

PROPOSAL 162 - Close commercial dungeness crab fishing in Swanson Harbor

Oppose. No need to close the area. Swanson Harbor is not local to any established community. There are other months in which recreational crabbers can set their pots. Swanson Harbor is not the only place available to recreational crab fishermen. In my opinion, they can try other places and/or other times if they have poor luck in Swanson.

PROPOSAL 161 - Close commercial dungeness crab fishing in Taku Harbor

Oppose. See above.

PROPOSAL 165 - Amend regulation regarding buoy markers in Dungeness crab fishery

Support. Department of Public Safety's interpretation of "identical" is unachievable. My only concern is the vague nature of the word "similar." If that could be tightened up I would like the proposal even more.

PROPOSAL 168 - Revised management plan for southeast pot shrimp fishery

Oppose. The language in the proposal contains the word "shall" which ties the hands of ADFG and forces them to leave subdistricts open. Frankly, from my experience in this fishery, I believe this would be a good idea 90% of the time. However, from conversations with area managers, I also think there are situations where it would not be good for the resource. If the word "shall" was changed to "may" I would support this proposal.

PROPOSAL 170 - Revised Pot Shrimp Fishery Management Plan utilizing inseason catch data

I would defer to ADFG on this. I doubt they can manage the resource any better using the types of data mentioned (catch data of effort, daily catch rates, shrimp size, and gear saturation) than what they already have in place. Currently no mechanism in place to measure shrimp size, unless the author envisions ADFG having personnel present in all district to conduct the measurements themselves and I see this as unlikely due to cost. Gear saturation seems a particularly bad metric upon which to base season length and it is unclear how this could be measured (buoys per square mile?). ADFG currently conducts preseason surveys in many areas of high abundance, and uses that information to set GHs for those areas. If ADFG thinks this is a good proposal, then I'm all for it, but it sounds poorly thought out to me.

PROPOSAL 171 - Establishing a spawner index system for Southeast Alaska pot shrimp fishery

Tentatively oppose.

A good idea, and probably the best proposal I see in the shrimp section. I would support the interim step of testing the method within selected fishing areas. One concern I have is that the spawner index might be different here than in Canada (different shrimp populations and fishery occurs at different time of year). It would be good to test and get local data.

I wouldn't go any further at this point.

Valid concerns exist regarding funding. The system is industry-funded in Canada. Our fishery is much smaller than Canadian fishery and we would generate a fraction of what they do. The spawner index system requires many local managers to be in touch with the fleet on a daily basis, sampling catch. None of them work for free. I doubt whether it could be a viable system in this region. I think it would be fair to ask the author of this proposal to estimate the cost of implementing a spawner index system for all of southeast Alaska. Those ramifications would need to be discussed more fully before I could support the proposal.

PROPOSAL 172 - Closing the commercial shrimp fishery in the vicinity of Skagway from September 1 to March 1 annually

In general I have no problem with creating small recreational use "sanctuaries" near to small rural communities. However, I'm not familiar enough with the Skagway area to know if that is what this proposal would accomplish (or if it is just another attempted resource grab). It would be helpful to know what percentage of the commercial shrimp harvest in District 15 currently comes from the proposed area. It would also be helpful to know what the historical effort (and harvest) has been in the proposed area from local recreational fishermen (hmm...perhaps another reason to support Proposal 140). District 15 has been closed to all commercial harvest for the past three seasons and it would also be helpful to know how that has affected the shrimp populations local to Skagway. Overall I would say the case as presented by the sponsors is less than compelling. Based on the proposal as written I would oppose. If they presented additional evidence that it would be a significant asset to the local community while only minimally affecting the commercial fishery, then I could change my mind.

I should add that leaving an area open to commercial harvesters between March 1 and September 1 is unlikely to be helpful at all to commercial fishermen as there is generally no open season during those dates.

PROPOSAL 173 - Changing the opening date for shrimp pot fishery

Oppose. Poorly written and a terrible idea. Not all parties would benefit. Weather is a big factor in the fishery, and the weather is generally worse in November than October. This might not affect anyone with a large boat, but

anyone with a smaller boat would suffer from having to fish in the winter. There is also no justification for the assertion that quality would be higher in November. That has never been my experience.

PROPOSAL 174 - Changing set times for deploying or retrieving shrimp pots

Oppose. The proposal rather sneakily tries to add a provision that pots may only be hauled or retrieved once per day. This represents a very big departure from current practice. Anyone who hauls more than once a day would suffer from this proposal, but the author either ignores or fails to consider this. Department of Public Safety would have a very difficult time enforcing the once per day aspect of this proposal.

The authors are correct that an 8 hour window sometimes seems short. Having said this, I believe they overstate their case. No one is "forced" to fish in severe weather, and sometimes discretion is the better part of valor.

PROPOSAL 175 - Revise marking requirements

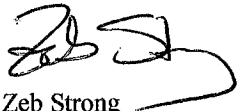
Vehemently oppose. Poorly written and a terrible idea. It is unclear how two buoy lines are unsafe. I actually feel the exact opposite is true. Strings of gear that are only marked at one end are a higher risk of tangling with other fishermen (because someone else can only make an educated guess at where the other end is likely to be located). They are also twice as likely to become lost pots, because you don't get a second chance to recover them if you break your line. The last thing the shrimp fishery needs is more lost pots and more conflict over gear tangles created by single-buoy strings. The author claims that no one is likely to suffer if this proposal passes, but I disagree. Anyone who fishes around a single-buoy numbskull fisherman is going to suffer.

PROPOSAL 312 - Management of coho salmon troll fishery

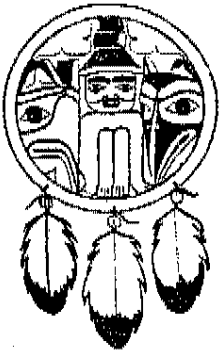
Unless there is a clear pattern of evidence that ADFG has mismanaged due to their discretion in this matter, I would prefer to leave any questions regarding closure length in their hands. The authors have offered no such evidence so I would tentatively oppose.

That is all.

Sincerely,



Zeb Strong
zebstrong@yahoo.com



Klawock Cooperative Association, Tribe

310 Bayview Blvd.
P.O. Box 430
Klawock, Alaska 99925

PHONE: 907-755-2265
FAX: 907-755-8800

FACSIMILE TRANSMITTAL SHEET

DATE: Dec 29, 2011 TOTAL NO. OF PAGES 4

TO: ATTN: BOF COMMENTS

COMPANY: Board Support Section, AK DEPT of Fish and Game

FAX NUMBER: (907) 465-6094

FROM: Klawock Cooperative Association Tribal Council

KCA Resolution 11-57
REGARDING: Opposition to Proposal 276-SAAG 01.710

NOTES/COMMENTS: FISHING SEASONS CHANGE the

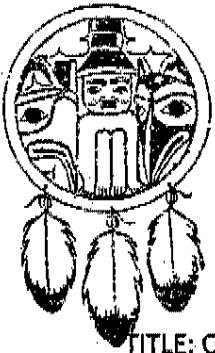
SUBSISTENCE SOCKEYE FISHERY IN THE Klawock RIVER

FROM FIVE TO SEVEN DAYS PER WEEK.

Any questions please contact:

HENRIETTA KATO, KCA OFFICE MANAGER

Henrietta



Klawock Cooperative Association, Tribe

810 Bayview Blvd.
P.O. Box 430
Klawock, Alaska 99925

Phone: 907-755-2265
Fax: 907-755-8800

RESOLUTION NO. 11-57

TITLE: Opposition to Proposal 276-5 AAC 01.710. Fishing Seasons. Change the Subsistence sockeye fishery in the Klawock River from five to seven days per week.

WHEREAS: The Klawock Cooperative Association, (hereafter "TRIBE"), is a duly constituted Indian Tribe organized pursuant to the authority of Section 16 of the Act of Congress of June 18, 1934 (48 Stat. 984), amended May 1, 1936 (49 Stat. 1250), and

WHEREAS: The Klawock Cooperative Association Tribal Council is a duly elected governing body of the Tribe, authorized to act by and on behalf of its members, and

WHEREAS: The Klawock Cooperative Association adamantly opposes the Proposal 276 5 AAC 01.710. Fishing Seasons. Change the Subsistence Sockeye Fishery in the Klawock River from five to seven days per week, and

NOW THEREFORE BE IT RESOLVED THAT: The Klawock Cooperative Association adamantly opposes the Proposal 276 5 AAC 01.710. Fishing Seasons. Change the Subsistence Sockeye Fishery in the Klawock River from five to seven days per week, and

BE IT FURTHER RESOLVED THAT: A majority of the nine (9) Tribal Council whose signature appears next to their name will constitute approval of this resolution.

A. Webster Demmert 12/27/11 Donald Nickerson, Jr. 12/27/2011
A. Webster Demmert, President Date Donald Nickerson, Jr. Vice-President Date

Ann M. Wyatt 12/27/11 Helen M. Jackson
Ann M. Wyatt, Secretary Date Helen M. Jackson, Treasurer Date

Brenda Leask 12/29/11 Frank Demmert, Jr.
Brenda Leask Date Frank Demmert, Jr. Date

Byron V. Skinna, Jr. 12-28-11 James S. Williams 12-27-11
Byron V. Skinna, Jr. Date James Williams Date

Patricia Cottle Date

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? N/A.

WHO IS LIKELY TO BENEFIT? Subsistence users that only own outboards greater than 35 horse power.

WHO IS LIKELY TO SUFFER? No one should suffer horse power is not a large factor. This regulation was originally to eliminate power skiffs.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Michael Douville

(IIQ-F11-174)

PROPOSAL 276 - 5 AAC 01.710. Fishing Seasons. Change the subsistence sockeye fishery in the Klawock River from five to seven days per week as follows:

Klawock subsistence sockeye fishery open July 7th to August 7th.

ISSUE: Klawock subsistence fishery July 7th August 7th Monday thru Friday.

WHAT WILL HAPPEN IF NOTHING IS DONE? Those users that work Monday thru Friday will continue to be deprived of opportunity to fish.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? N/A.

WHO IS LIKELY TO BENEFIT? Subsistence users that work week days will be able to fish.

WHO IS LIKELY TO SUFFER? No one should suffer if week end is open.

OTHER SOLUTIONS CONSIDERED? None.

PROPOSED BY: Michael Douville

(HQ-F11-171)

PROPOSAL 277 - 5 AAC 77.682. Personal use salmon fishery. Allow for use of dip nets in the Taku River for personal use as follows:

Allow taking of personal use salmon on the Taku River with dip nets in addition to set nets.

ISSUE: Personal use fishery congestion on the Taku River because there are few suitable sites (3) for set nets on the Taku.

WHAT WILL HAPPEN IF NOTHING IS DONE? Personal use fisher conflicts will increase, safety at the few sites can be an issue depending on river flow levels.

PLEASE READ CAREFULLY
REVIEWER LETTER

Dear Reviewer:

August 2011

The Alaska Board of Fisheries will consider the attached book of regulatory proposals at its **October 2011 through March 2012** meetings. The proposals concern changes to the State's fishing regulations. Members of the public, organizations, advisory committees, and ADF&G staff timely submitted these proposals. The proposals are published essentially as they were received.

The proposals in this book are presented as brief statements summarizing the intended regulatory changes. In cases where confusion might arise or where the regulation is complex, proposed changes are also indicated in legal format. In this format, bolded and underlined words are additions to the regulation text, and capitalized words or letters in square brackets [XXXX] are deletions from the regulation text.

You are encouraged to read all proposals presented in this book. Some regulations have statewide application and some regulations may affect other regions or fisheries of the state. Also, some proposals recommend changes to multiple fisheries within an area or region.

In this book the proposals are first grouped by the meeting to which they pertain (see *Proposal Index* for each meeting). Within each meeting the proposals are then organized by region, fishery or species. These proposal lists are not in roadmap order for the meeting. The board will generate a roadmap for deliberations prior to each meeting when committee assignments are made. The roadmap may be changed up to and during the meeting. Agendas for each Board of Fisheries meeting will also be available prior to the meeting.

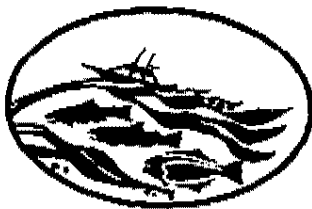
Before taking action on these proposed changes to the regulations, the board would like your **written comments and/or oral testimony** on any effects the proposed changes would have on your activities.

After reviewing the proposals, please send written comments to:

ATTN: BOF COMMENTS
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Public comment, in combination with advisory committee comments and ADF&G staff presentations, provide the Board of Fisheries with useful biological and socioeconomic information. Written comments become public documents. The following are recommendations for providing written comments:

Timely Submission. Submit written comments by mail or fax so that they are received no later than two weeks prior to the meeting during which the topic will be considered (see *Tentative Meeting Schedule* on Page v). Written comments received after the two-week deadline will still be accepted but will not be inserted in board member workbooks until the beginning of the meeting or cross-referenced with individual proposals.



Petersburg Charter Boat Association
P.O. Box 1507
Petersburg, Alaska 99833

ATTN: BOF COMMENTS
Boards support Section
ADF&G
P.O. Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094

RE: Proposal Comments, SE Finfish, February/March 2012

Chairman Johnstone, Board Members,

Please accept these comments on behalf of the Petersburg Charter Boat Association. Our association was formed in 1992 and currently consists of 17 business members representing 21 active charter vessels. Our membership is made up of day charters, overnight charters and lodge owners.

Proposal 210; SUPPORT...Rockfish release at depth...in light of new Dept. data showing the potential benefit in reducing release mortality, this proposal benefits the resource and all user groups. If adopted, credit for reduced release mortality could help alleviate allocation issues between gear groups.

Proposal 212; SUPPORT...Increase sport allocation of rockfish...harvest data shows the commercial sector does not utilize their current level of allocation of rockfish for by-catch in order to prosecute their longline fisheries. At the same time the sport fishery is under very restrictive bag and annual limits just to stay within their allocation. A minor increase in the sportfish allocation in order to provide a small cushion, to prevent time and area bottomfish closures, will benefit all recreational users without any negative impacts to the commercial fishery.

Proposal 213; OPPOSE...Harvest record, point system...this is a complicated, potentially confusing method to determine what is a daily bag limit of rockfish.

Proposal 216; SUPPORT...Remove annual limits on Sablefish...annual limits on sablefish are not necessary based on actual harvest numbers. Annual limits were put in place based on inflated numbers of potential harvest presented by commercial fishers. Annual limits are normally used to control harvest to an allocation. There is no allocation of sablefish for the recreational fishery. Annual limits are burdensome to both guided and non-guided recreational fishers as well as charter operators and are not necessary to control harvest.

Proposal 221; SUPPORT...Increase sport allocation of Lingcod...the commercial allocation of Lingcod is not being harvested. The sportfish regulations are very restrictive including a size slot limit, minimal bag and annual limits as well as season closures. A small reallocation to the sport fishery will provide increased harvest opportunity and better utilize this valuable public resource.

Proposal 224; OPPOSE... Use Lingcod for bait...Lingcod is too valuable of a resource to both the sport and commercial fisheries to be used as bait.

Proposal 248; NO POSITION... Bag limits to boat limits...comment, we understand the issue the proposer is trying to address, legalizing what is a common practice for many people, including resident, non-resident, guided and non-guided fishers. Adoption might simplify enforcement of bag limits for groups and we doubt it would have much impact on overall harvest. Charter guides can run afoul of current regulations while honestly trying to assist the elderly or children. Probably would require a change in the definition of bag limit.

Proposal 249; OPPOSE...Annual limits on all species... no justification, no documented conservation concerns and no allocation issues. This proposal is yet another attempt to set some type of "export limit" on non-residents because of reported abuses by a small percentage of non-resident sport fishers contributing to "conservation issues". The proposer makes no reference as to how commercial fisheries are "contributing to conservation issues" even though those fisheries harvest an overwhelming majority of most species listed in this proposal.

Proposal 251; OPPOSE...Two rods for non-guided...poorly written proposal aimed at benefitting resident anglers but would allow all non-guided anglers this advantage. Not clear as to intent for salmon only or all species.

Proposal 252; OPPOSE...Electric reels...this issue was recently dealt with at a statewide meeting and reasonable regulations were adopted. In the proposers attempts to "preserve the integrity of what the definition of sport fishing truly is" he is merely stating personal opinion. (fly fishing purists don't think bait fishers are true sport fishers, etc)

Proposal 253; OPPOSE AS WRITTEN...Charter to troll stand down...not sure just how big of an issue this really is but a "stand down period" between a vessel participating in these two fisheries would put an economic hardship on some. It is already illegal to commercial fish in waters closed to commercial fishing and it's already illegal to sell sport caught fish. With more enforcement this shouldn't be an issue. The requirement to remove or cover either the charter decal or HT and commercial numbers seems counter productive in identifying vessels engaged in the reported activity.

Proposal 260; OPPOSE...Increase bag limit and area...because the increased bag limits do not apply to an annual limit. Could significantly increase harvest of both hatchery and non-hatchery fish.

Proposal 261; SUPPORT...Increase bag limit and area...this area has a high percentage of Alaska hatchery kings and a slight increase in bag limit would not have a significant impact on other user groups. Existing annual limits would still apply to control excess harvest.

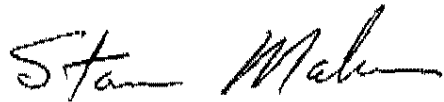
Proposal 269; OPPOSE...Punch cards...this would establish yet another data collection method with charter logbooks, creel census and the mail out survey and would require additional funding and Dept staff time.

Proposal 274; OPPOSE...Personal use gear types...too liberal. Most personal use fisheries designate what type of gear can be used for that individual fishery. Not all gear types are appropriate for every fishery.

Proposal 294; OPPOSE...Reporting of personal use...commercial fishers are already required to report commercial harvest retained for personal use on fish tickets. Adoption of this proposal would likely result in even less accountability. Better enforcement of current regulations is needed.

Proposal 312; SUPPORT...10 day troll closure... short or no troll closures allocate fish away from the inside areas and user groups. Adoption of this proposal will benefit inside users, both sport and commercial, and contribute to conservation and escapement.

Thank you for consideration of our comments,



2/3/2012

Stan Malcom
President, Petersburg Charter Boat Association
P.O. Box 1507
Petersburg, AK 99833
907-518-0543

John Peckham
7825 South Tongass
Ketchikan, Alaska 99901

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

Mr. Chairman and Board members,

Regarding Proposal 333:

I have purse seined in Southeast Alaska since 1975.

I am opposed to Proposal 333. Adoption of this proposal would not help the current status of the Southeastern Alaska Area Enhanced Salmon Allocation Management Plan.

In the 2008 industry consensus, not including Neets Bay in the SHAs that had sunset provisions was purposeful.

John Peckham
7825 South Tongass
Ketchikan, Alaska 99901

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

Mr. Chairman and Board members,

Regarding Proposal 286:

I am opposed to removing the requirement that participants in the Southeast Purse Seine Fishery use boats that are no longer than 58 feet.

I have purse seined in Southeast Alaska since 1975.

The Southeast purse seine fleet does not need to become more efficient. The fleet can catch all available surpluses.

The 58 foot limit has been in place for over half a century. Capital investments have been made in the fishery with the knowledge of this limit. It is unfair to those who have made these investments to change the rules.

I don't believe the potential benefit of processing on board nor increasing the versatility of longer vessels outweighs the negative effects on the value of the existing fleet, nor the potential increase of capital requirements to be competitive in the fishery.

John Peckham
7825 South Tongass
Ketchikan, Alaska 99901

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

Mr. Chairman and Board members,

Regarding Proposal 296:

I am opposed in Proposal 296.

I have purse seined in Southeast Alaska since 1975.

Adoption of this proposal would be inconsistent with 5AAC 33.363 which sets the allocation guidelines between the net fleets.

In general, salmon available in district 6 are fully harvested. Implementing proposal 296 would reallocate not only pink salmon, but also chum and sockeye salmon from the seine fleet to the gillnet fleet. Although the gillnet fleet is somewhat behind in some years in their percentage of pink salmon set in the guidelines, they are very far ahead in their percentage of chums and relatively even in their percentage of sockeye. There is no reason to change current district 6 management.

John Peckham
7825 South Tongass
Ketchikan, Alaska 99901

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

Mr. Chairman and Board members,

Regarding Proposal 297:

I am opposed in Proposal 297.

I have purse seined in Southeast Alaska since 1975.

Adoption of this proposal would be inconsistent with 5AAC 33.363 which sets the allocation guidelines between the net fleets.

In general, salmon available in district 6 are fully harvested. Implementing proposal 297 would reallocate not only pink salmon, but also chum, and sockeye salmon from the seine fleet to the gillnet fleet. Although the gillnet fleet is somewhat behind in some years in their percentage of pink salmon as set in the guidelines, they are very far ahead in their percentage of chums and relatively even in their percentage of sockeye. There is no reason to change current district 6 management.

2/8/12

To Alaska Board of Fisheries.

Dear Board Chair,

I am writing to voice my opposition to proposal # 212, a rockfish allocation increase for guided sport anglers.

I am a commercial halibut skiff fisherman in Sitka. The commercial sector has seen significant cuts to the harvest quota and thus have taken losses to income from reduced catches. We have also reduced rockfish bycatch by sharing rockfish habitat areas information, by avoiding them in our pursuit of target species, mainly Halibut and Blackcod.

Because the guided sport sector has exceeded its bycatch allocation, they are asking for an increase. This is totally wrong for management to reward overfishing with more fish. Doing so would send a terrible message to harvesters to keep catching and gain market share.

I would like you to vote against proposal 212 and manage the resource in a sound and sustainable way.

Thank you for your time.

Terry Perenzovich

Terry Perenzovich
Sitka

February 8, 2012

Atten: BOF Comments
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: BOF PROPOSALS #325 AND #326

Dear Mr. Johnstone,

I am writing in support of BOF Proposals #325 and #326. For a number of years trollers have been seriously behind in their allocation of the value of enhanced fish as established by the Board.

If Proposal #325 is approved, more area will be opened in June. Inherent in the proposal is a three-year sunset clause. During this time the Department will develop a management plan. Under present regulations, both Section 14 and Section 15 open on July 1st. If Proposal #325 is adopted, the management plan will extend into July. In this way by-catch concerns may be studied and the fishery regulated via Emergency Regulations.

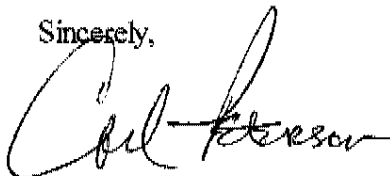
Passage of Proposal #326 would provide a twenty-day window in July for trollers to catch more fish near the terminal area, Amalga Harbor.

As you may be aware DIPAC has paid off its' loans and under terms of its' permit, cannot conduct a targeted fishery other than cost recovery in the terminal area. In the area encompassing #326, only chum and pinks may be retained. All other salmon species must be returned to the ocean unharned.

Also, there are about seventy gillnet boats with troll permits. This area would be easily accessible to this fleet and extend the number of days each week that a double-permitted vessel might fish.

In my opinion, both Proposal #325 and Proposal #326 are win-win situations and I would urge adoption of both proposals by the Board.

Sincerely,



Carl Peterson
f/v Last Dance
P.O. Box 593
Sitka, AK 99835

ATTEN: BOF COMMENTS

February 7, 2012

**Boards Support Section
Alaska Department of Fish and Game**

RE: BOF Proposals #325 and #326

Chairman Johnstone and Board of Fisheries Members,

In June, 2010, a small handful of Sitka boats went to Icy Straits to fish chum. We did not know if the fish would be there but, after number two diesel, it is hope that fuels the independent fisherman. Six boats grew to 23 as more boats arrived and Hoonah boats joined the tiny fleet. Sitka fishermen shared their trolling techniques and Hoonah fishermen shared their extensive knowledge of local streams and rivers. I had not realized how significant this emerging fishery was until a young stranger on a Hoonah dock extended his hand to my husband and said "Thank you. It's about time someone did something."

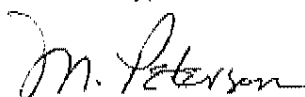
The following year, between 114 and 120 trollers from as far away as Yakutat and Monterey Bay fished Icy Straits, spending thousands of dollars on groceries, restaurants, supplies and fuel, all in local businesses by-passed by cruise ships as they docked outside of town at the tourist facility. This new fishery was profitable and helped make up for losses from poor Chinook returns in surrounding communities. Hand trollers participated alongside power trollers. Part-time fishermen from Hoonah were able to keep their jobs ashore and supplement their incomes. Chum salmon paid bills and repaired long-neglected fishing boats. For one uninsured Hoonah father, chum salmon helped cover expenses related to his young daughter's surgery. Icy Straits also provided a welcome respite from more dangerous outside waters, offering safety for smaller boats and boats with families; and, for one 82 year old fisherman from Meyers Chuck, an opportunity for one last hurrah.

I am extremely proud of the community of men and women who opened Icy Straits to chum fishing. Where there was no chum fishery, there is now, in just two seasons, a one-million dollar fishery with potential for responsible growth. I believe the Icy Straits fishery has had a net positive effect

I also believe the three-year management plan (Chum Trollers Association Proposal #325, as amended by the JPRT), will provide critical oversight and protection of the different salmon species along the Admiralty shore as this area is explored for potential development.

Thank you for this opportunity to express my support for Board of Fish Proposal 325 and Proposal 326. I urge you to pass these two proposals as they would not only provide an opportunity to improve our Southeast trollers allocation situation but provide a framework for responsible development of this valuable fishery.

Sincerely,



Mary Ann Peterson f/v Last Dance
P.O. Box 593
Sitka, AK 99835



PURSE SEINE VESSEL OWNERS ASSOCIATION

1900 W. NICKERSON ST., #320
SEATTLE, WA 98119-1650

TEL. (206) 283-7733
FAX. (206) 283-7795

February 8, 2012

VIA FACSIMILE (907) 465 -6094

Alaska Board of Fisheries
c/o Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115826
Juneau, AK 99811

Re: Southeast and Yakutat Finfish Board of Fisheries Meeting

Dear Board of Fisheries Members:

The Purse Seine Vessel Owners Association ("PSVOA") submits the following comments on certain proposals before Board at the upcoming Southeast and Yakutat Board of Fisheries meeting in Ketchikan beginning on February 24, 2011. PSVOA represents purse seine vessel owners throughout Alaska and the Northwest, including Southeast.

Proposal 285 – Repeal 58 foot limit in Southeast salmon purse seine fishery
Proposal 286 – Increase length limit for Southeast salmon seine vessel to 75 feet

The proponents of these proposals have not come forward with compelling reasons to remove the long-standing 58 foot limit, which to date has been the legal limitation faced by every permit holder purchasing or constructing a vessel for this fishery. Debating the continued rationale or validity of the 58 foot limitation cannot alter the fact it is the standard upon which permit holders have relied and the seine fleet has developed. Moreover, to now allow vessels greater in length than 58 feet is inconsistent with the ongoing efforts to consolidate permits and reduce harvesting capacity in the Southeast salmon seine fishery.

Proposal 288 – Allow seine vessels to transport two seine nets.

Many permit owners that have a long history of participation in the fishery do not own vessels that are large enough to carry two seine nets. Therefore, this proposal creates an unfair advantage for permit owners having larger vessels over permit owners with smaller vessels. Accordingly, PSVOA opposes this proposal.

Proposal 342 – Establish a registration fishery for the Hidden Falls THA to replace the cost recovery harvest with tax assessment.

The Hidden Falls chum fishery is pivotal to the management of the northern Southeast salmon seine fishery in late June through mid-July. If Hidden Falls is not scheduled for a common property fishery, then ADF&G will not schedule other common property fisheries over concerns that too much

February 8, 2012

Page 2

harvest capacity will focus in one particular area. By replacing the cost recovery fishery with common property fisheries and the related assessment, ADF&G will have increased flexibility to schedule other common property fisheries by allowing the seine fleet to spread out into different areas. In addition, removal of the cost recovery fishery in Hidden Falls will likely result in an increase in vessel earnings and ex-vessel chum pricing.

Thank you for considering our comments.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert F. Kehoe". The signature is stylized with a large, looping "R" and a long, sweeping "K".

Robert F. Kehoe, Executive Director
Purse Seine Vessel Owner's Ass'n



PURSE SEINE VESSEL OWNERS ASSOCIATION

1900 W. NICKERSON ST., #320
SEATTLE, WA 98119-1650

TEL. (206) 283-7733

FAX. (206) 283-7795

February 9, 2012

VIA FACSIMILE (907) 465 -6094

Alaska Board of Fisheries
c/o Alaska Department of Fish and Game, Boards Support Section
P.O. Box 115826
Juneau, AK 99811

Re: Southeast and Yakutat Finfish Board of Fisheries Meeting

Dear Board of Fisheries Members:

The Purse Seine Vessel Owners Association ("PSVOA") submitted comments on certain proposals before Board at the upcoming Southeast and Yakutat Board of Fisheries meeting in a letter dated February 8. The following supplements PSVOA's comments in its February 8 letter.

Proposal 334 – Anita Bay Terminal Harvest Area Salmon Management Plan
Proposal 335 – Deep Inlet Terminal Harvest Area Salmon Management Plan

PSVOA supports the proposals submitted by the Southeast Joint Regional Planning Team ("RPT") for both Anita Bay and Deep Inlet, with the exception of the six (6) year term of the plans. Instead, PSVOA respectfully submits that a three (3) year term is preferable over a longer term because it affords the ability to examine the allocation percentages for the competing gear groups and the ability to make adjustments in the plans if necessary.

Thank you for considering our comments.

Very truly yours,

Robert F. Kehoe, Executive Director
Purse Seine Vessel Owner's Ass'n

Petersburg Vessel Owners Association

PO Box 232

Petersburg, AK 99833

Phone & Fax: 907.772.9323

pvoa@gci.net • www.pvoaonline.org

February 9th, 2012

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Via Fax: (907) 465-6094

RE: BOARD OF FISHERIES 2012 SOUTHEAST FINFISH PROPOSALS

Dear Chairman Johnstone and Board Members,

PVOA is a diverse group of over 100 commercial fishermen and businesses operating primarily in Southeast Alaska. Our members provide millions of meals to the public annually by participating in a variety of fisheries statewide including salmon, herring, halibut, cod, crab, blackcod, shrimp, and dive fisheries. Many PVOA members are also active sport, personal use, and subsistence fishermen who depend on sustainable and conservative management of Alaska's fishing resources to ensure healthy fisheries for the future. We appreciate the opportunity to comment on 2012 Southeast Board of Fish finfish proposals. PVOA members reached general consensus on the following proposals:

GROUNDFISH

Proposal #200 – SUPPORT, Clarify the use of post-processed and reported commercial fish as bait. PVOA supports this Department proposal that would allow for the use of the head, tail, fins, and viscera of delivered and processed commercial sablefish, lingcod and thornyhead, shortraker, rougheye, and yelloweye rockfish, may be used for bait. When the Board prohibited the use of these species for bait, it also inadvertently prohibited the use of delivered and processed waste. Fishermen may unknowingly be using the delivered and processed waste of these species in violation of the law. By allowing delivered and processed waste to be used by the fishing industry it will allow every part of harvested fish to be utilized.

#141- OPPOSE, Prohibit bottomfishing and shellfish near Cache Island by all users. PVOA is opposed to actions that close areas to fishing when there is no conservation concern for the overall stock of the area, or where there is no biological reason to close an area. Closing areas to personal use and

commercial fishing forces further crowding into areas traditionally fished by personal use and commercial harvesters.

#142 – OPPOSE, Prohibit nonresidents from fishing for bottomfish and shellfish in a portion of Behm Canal. PVOA is opposed to actions that close areas to fishing when there is no conservation concern for the overall stock of the area, or where there is no biological reason to close an area.

#143 – OPPOSE, Prohibit nonresidents from fishing for bottomfish and shellfish in a portion of Naha Bay. PVOA is opposed to actions that close areas to fishing when there is no conservation concern for the overall stock of the area, or where there is no biological reason to close an area.

#144- OPPOSE, Prohibit nonresidents from fishing for bottomfish and shellfish near Cedar Island. PVOA is opposed to actions that close areas to fishing when there is no conservation concern for the overall stock of the area, or where there is no biological reason to close an area.

Proposal #206- SUPPORT AMMENDED, Create a spiny dogfish fishery in Ketchikan area. PVOA members are fully supportive of the development of sustainable new fisheries in Alaska. However PVOA members would like to see the proposal expanded to more areas throughout Southeast. Although spiny dogfish in Southeast are vastly under surveyed which has resulted in extremely conservative stock assessments, PVOA is also fully committed to seeking additional funding for adequate stock assessments for this under surveyed species. We also highly encourage state and federal managers to pursue adequate funding for shark stock assessments in all areas of Alaska in order to ensure proper estimates of the biomass of all shark species. By allowing for a directed pot fishery for spiny dogfish, fish would be brought onboard live which would result in a higher quality product. Pot fishing ensures that bycatch rates of other species are minimal and results in little impact to bottom habitat.

Proposal #207- SUPPORT, Increase the spiny dogfish daily bag limit. PVOA supports increasing the sport spiny dogfish bag limit from 5 to 10 daily. Given the potential for increased harvest and the uncertainty surrounding spiny dogfish populations it would be appropriate for the Board to require that spiny dogfish be broken out into a separate column in the sport fishing State Wide Harvest Survey) as opposed to being included in the general shark complex. We also highly encourage state and federal managers to pursue adequate funding for shark stock assessments in all areas of Alaska in order to ensure proper estimates of the biomass of all shark species.

Proposal #208 – SUPPORT, Establish commercial fishing seasons for Pacific cod for the Eastern Gulf of Alaska Area. PVOA supports this Department generated proposal that defines in regulation the season for the directed Pcod fishery in Southeast.

Proposal #209 – SUPPORT, Establish commercial fishing seasons for black rockfish for the Eastern Gulf. PVOA supports this Department generated proposal that defines in regulation the season for the directed black rockfish fishery in Southeast.

Proposal #210 & #211 - Require release of demersal shelf rockfish at a depth sufficient to allow recompression. PVOA is supportive of actions that reduce rockfish mortality. However PVOA is fully supportive of efforts to reduce DSR bycatch over efforts to reduce mortality. Requiring that rockfish be released at a certain depth would be difficult to enforce and monitor, however we look forward to data presentation that indicates mortality rates for released rockfish are low enough to pursue adoption of this proposal, as initial Department research reports a 95% survival rate on rockfish released at depth. The BOF has charged both the commercial and charter sectors with finding ways to reduce bycatch as opposed to asking for an increase in allocation. Reducing rockfish bycatch lessens impacts to DSR stocks which are typically long-lived and slow-growing species.

Proposal #212 – OPPOSE, increase the sport allocation of demersal shelf rockfish to 25%. PVOA fully opposes any reallocation of DSR as the BOF has charged both the commercial and charter sectors with finding ways to reduce bycatch as opposed to asking for an increase in allocation. The commercial sector has remained under their allocation since 2006 due to avoidance of DSR. Efforts by the Alaska Longline Fisherman's Association (AFLA) to effectively map and avoid areas of high rockfish abundance are producing positive results. We highly encourage the Board to invite ALFA to give a short presentation on their Rockfish Reporting Network. Reducing rockfish bycatch lessens impacts to DSR stocks which are typically long-lived and slow-growing species. We also highly encourage state and federal managers to pursue adequate funding for DSR stock assessments in all areas of Alaska in order to ensure proper estimates of the biomass of all DSR species.

Proposal #213 – SUPPORT, Establish a point system for retention of rockfish. It is our understanding that this proposal is written for sport charter anglers, and PVOA is supportive of actions where the sport charter sector establishes means to live within their allocation of DSR as opposed to requesting an increase in allocation.

Proposal #214 – SUPPORT, Standardize sablefish retention and reporting requirements in regulation. PVOA supports this Department generated proposal that ensures uniform regulation in the Northern Southeast and Southern Southeast sablefish fisheries and establishes a reporting requirement for sablefish that are released in Southern Southeast. PVOA is also fully supportive of the Department reviewing and updating the current mortality rates associated with released sablefish in the Clarence and Chatham sablefish fisheries.

Proposal #215 – SUPPORT, Amend the sablefish fishing season to allow permit holders to participate in stock assessment surveys. PVOA supports

this Department generated proposal that streamlines the process for contracting permit holders and vessels to participate in surveys.

Proposal #216 – OPPOSE, Repeal the non-resident sablefish annual limit and reporting requirements. PVOA fully opposes repealing the annual limit for non-residents and repealing requirements for reporting on sport fishing licenses of sablefish. The current limits and reporting requirements are more than adequate for sablefish which are a fully-utilized, fully-allocated, and newly sport-fished species. It is important that reasonable limits are placed on anglers in Alaska and that record keeping and reporting requirements are sufficient to gather information on this new sport fishery to establish a baseline of data. With both State and federal sablefish fisheries in a period of low abundance, it is reasonable to hold non-resident anglers to an annual limit and help establish reasonable expectations for anglers. Both the Chatham (Northern Southeast Inside or NSEI) and Clarence (Southern Southeast Inside or SSEI) sablefish stocks have been declining. The NSEI allowable biological catch (ABC) has been declining since 2003, and the SSEI ABC has been declining since 2006. The continually declining biomass in both the state and federal blackcod fisheries indicate that a conservation concern exists in Southeast. With the majority of sport harvest of sablefish occurring in NSEI, in the 2011 sablefish quota announcement the Department stated the ABC decreased 16% from 2010 to 2011. In addition to continuous quota reductions, the Department also announced: “The newly available charter logbook data indicates that in 2010, guided sportfish harvest was approximately 3% of the 2011 ABC. We researched the best available data sources to update the percentage decrement of the ABC for unguided sportfish harvest, subsistence, personal use, and deadloss in non-halibut fisheries; these mortalities were estimated to equal 2.5% of the 2011 ABC.” **As most Southeast charter clients are non-resident anglers, the 2010 data indicates that non-resident harvest in NSEI is higher than unguided sport, subsistence, and personal use combined. This further illustrates the need to retain reasonable limits for sport anglers harvesting sablefish in Southeast Alaska.**

Proposal #217- Amend the lingcod allocation between longline, troll, and dinglebar fisheries in the Eastern Gulf. Without further clarification on how the individual user groups would be impacted under this proposal, PVOA is unable to support this proposal at this time. We look forward to the Department’s comments on this issue.

Proposal #218 – Allow for retention of lingcod in the troll fishery. Without further clarification on how the individual user groups would be impacted under this proposal, PVOA is unable to support this proposal at this time. We look forward to the Department’s comments on this issue.

Proposal #219 – Increase allocation for commercially caught lingcod in Northern Southeast Outside district. Without further clarification on how the individual user groups would be impacted under this proposal, PVOA is unable to support this proposal at this time. We look forward to the Department’s

comments on this issue.

Proposal #220 – Reallocate a portion of the East Yakutat Section lingcod GHL. Without further clarification on how the individual user groups would be impacted under this proposal, PVOA is unable to support this proposal at this time. We look forward to the Department's comments on this issue.

Proposal #221 – OPPOSE, Increase the sport allocation of lingcod in Central Southeast Outside Section and Southern Southeast Outer Coast. The commercial fleet has avoided exceeding their allocation of lingcod in these areas and those fish should not be reallocated to the sport fleet. It is important that both sectors live within their allocations instead of requesting a reallocation of fish. The underharvest of lingcod in Southeast Alaska by the commercial fleet is likely due to the commercial halibut quota declining 76% since 2006. As opposed to reallocation, we are fully supportive of pursuing funding for additional stock assessment research to determine if abundance is being adequately estimated.

Proposal #223 – SUPPORT, Clarify dinglebar gear in the lingcod fishery allowing for only one line. PVOA supports this Department generated proposal that will clarify existing regulations regarding the single-line dinglebar fishery.

Proposal #224 – OPPOSE, Allow lingcod to be used as commercial bait. Lingcod is a fully-allocated resource in Southeast. By allowing one sector to use this species as bait will likely result in a reduction in the available allocation of lingcod which PVOA is not supportive of. However many of the lingcod proposals occurring in the 2012 Southeast BOF cycle further highlight the need for adequate stock assessments of lingcod. Many user groups remain concerned that lingcod stock assessments underestimate the current biomass levels in Southeast. As opposed to allowing for the use of lingcod as bait, we are fully supportive of pursuing funding for additional stock assessment research to determine if abundance is being adequately estimated.

HERRING

Proposal #225- SUPPORT, Allow combining of two units of gear in herring spawn on kelp fishery. PVOA supports this proposal that would allow the combining of two pens but does not allow additional kelp to be used or allocated. By allowing for the use of two sewn-together pens, a bigger swim pattern for herring is created that will reduce scale loss, increase available oxygen, and potentially increase survival of herring. This proposal would also likely improve product quality.

Proposal #226 – SUPPORT NOTING CONCERN, Amend spawn-on-kelp gear marking and removal requirements. PVOA supports the Department's intent to manage the herring pound fishery more effectively by clarifying and further defining the marking requirements for herring pound equipment and structures, establishes season dates, and requiring that all pound equipment be removed

from the water after the close of the fishery to avoid potential conflict with other users of the area. Concern was noted by PVOA members regarding the all-encompassing nature of the proposal. PVOA members expressed concern with the addition of adding a permit holder's first and last name to the tow pound and associated equipment, as pounds are operated by multiple permit holders and requiring that all permit holders list their name would result in a sign so large that it would impede harvesting abilities. A typical pound operation will have one support vessel and seven to 10 permit holders working off of the support vessel. As opposed to requiring all permit holders are listed on the tow pound, the Board could consider requiring a log book be kept that recorded permit holder information. PVOA is supportive of setting in regulation when the fishery will close to establish a set time frame for mandatory removal of herring pound equipment from a fishing area. **As opposed to the Board adopting this proposal in its current form, PVOA members highly recommend that permit holders and the Department are tasked with developing workable solutions to strengthening herring pound regulations.**

Proposal #227 – SUPPORT, Amend the 1-E and 1-F commercial sac roe fishery to clarify only the purse seine fishery as an equal quota share fishery. PVOA supports this Department generated proposal that amends regulations to follow the intent of the Board for only the purse seine fishery in Behm Canal to be an equal split fishery.

Proposal #228 – Remove the mesh restriction in the District 1-E and 1-F gillnet sac roe fishery. PVOA supports this proposal that will delete the 2 ¼ inch mesh restriction; we encourage the BOF to adopt proposal #229 that clarifies the 2 ¼ inch mesh restriction would be *replaced* (as opposed to deleted) with the state-wide standard of 2 1/8 inch.

Proposal #229 – SUPPORT, Remove the mesh restriction in the District 1 gillnet sac roe fishery. PVOA supports replacing the inconsistent 2 ¼ inch mesh restriction in the Behm Canal gillnet sac roe fishery with the state-wide 2 1/8 inch mesh restriction. This action would create a uniform and efficient mesh size restriction throughout the region and will allow for effective harvest of herring in District 1.

Proposal #230 – OPPOSE, Revise the commercial herring fishery management plan for Sitka Sound. PVOA is opposed to this proposal which will amend the Sitka Sound management plan to include age class strength and sex composition, ecosystem considerations of target and non-target species, and geographic distribution prior to consideration of a commercial fishery in 13-A and 13-B. The Sitka Sound sac roe fishery has been operating sustainably since the early 1970s. The Sitka Sound sac roe fishery is one of ADF&G's success stories for sustainable management. Within fisheries managed by the State, the Sitka Sound sac roe fishery is one of the most researched species and fisheries. The highly-regulated fishery has sustained decades of successful fisheries management and has subsequently resulted in herring biomass in Sitka Sound reaching record highs. Current herring biomass levels likely exceed pre-fishery

levels, as accounted by participants in the fishery who helped develop and establish the Sitka Sound sac roe fishery prior to limited entry. Further regulating a highly-regulated fishery without basis or merit is setting a dangerous precedent for fisheries management in the State of Alaska.

Proposal #231- OPPOSE, Amend the GHL for the Section 13-A and 13-B herring fishery to close the season once harvest is within 10% of reaching the GHL. PVOA is opposed to this proposal that will further dictate how ADF&G will manage the Sitka Sound sac roe fishery. ADF&G has been successfully managing the Sitka Sound herring fishery for decades. The pulse nature of the fishery is best managed with a GHL that allows for a small amount of overage and underage of harvested herring. Without adequate justification to change the management plan, we cannot support needless over-regulation of the herring fishery.

Proposal #232- OPPOSE, Repeal regulations for establishing the herring fishery GHL for Sections 13-A and 13-B. POVA is opposed to this proposal that will further dictate how ADF&G will manage the Sitka Sound sac roe fishery. ADF&G has been successfully managing the Sitka Sound herring fishery for decades. Without adequate justification to change the management plan, we cannot support needless over-regulation of the herring fishery.

Proposals #233 & #234- SUPPORT, Establish an equal share fishery for herring sac roe in Sitka Sound. PVOA members with Sitka Sound herring sac roe permits continue to support equal split. It is our understanding that the vast majority of Sitka Sound permit holders are in support of equal split. Establishing an equal share fishery in the Sitka sac roe fishery would effectively address safety concerns within the fishery. The Sitka Sound sac roe fishery has been operating as a gladiator-style fishery with the safety of vessels, skippers, and crew being a major concern. Recent events in the Sitka Sound sac roe fishery have further highlighted the urgent need for a slower-paced, safer fishery. With the adoption of an equal share fishery, it will reduce the significant enforcement presence freeing Coast Guard and other personnel to be more evenly distributed to other fisheries being conducted at that time. Allowing an equal share fishery would drastically reduce the potential for fatalities, vessel loss, gear loss, and vessel damage. Managers, processors, and the fleet would be able to further coordinate to ensure that the best possible product is harvested. An equal share fishery would allow for a more consistent product stream to stabilize processing abilities. When the Board adopts equal share for Sitka Sound, permit holders must be given a seat at the table while a management plan is developed to ensure minimal loss of crew jobs, tender jobs, and vessels participating in the fishery.

Proposal #235 - OPPOSE AS WRITTEN, Restrict fishing vessels from entering into the announced fishing area prior to openings in the Sitka Sound commercial herring fishery. PVOA members understand the intent of the proposal is to restrict access by ALL vessels to the defined fishing area until the countdown for an opening begins. By restricting all vessels from entering the

defined fishing area for two hours prior to an opening, it would not allow vessels to find herring to set on before an opening begins. Without the ability of vessels with permits (vessels allowed to fish) to find herring before an opening, vessels would no longer just be racing for a set, they would be racing to find herring at the same time as the other 50 permit holders. Instead of reducing the potential for fatalities, vessel loss, gear loss, and collisions, these events would be inevitable with adoption of the proposal as written. **However, PVOA members would support regulations that formalize the current fleet agreement that vessels without permits do not enter the defined fishing area until the opening begins.** The number of “support” vessels (tenders, divers, roe samplers, etc.) participating in the Sitka Sound sac roe fishery can often equal the number of vessels with permits fishing in an opening. By setting in regulation that only vessels with permits are allowed in the defined fishing area until an opening commences, it would increase the ability of the fleet to fish safely.

Proposal #236 - OPPOSE AS WRITTEN, Change specification for herring purse seines to reduce depth of nets for Sitka Sound commercial herring fishery. PVOA members are unable to support the portion of this proposal that further restricts net depth due to the potential for reducing catching power. Deeper nets are well-suited for openings in deep water, and the ability of the fleet to be adaptive to fishing areas with shallow and deep nets should be maintained. However, **POVA members fully SUPPORT the mesh size restriction of 1 ½ inches or less** as this action will put Southeast in line with the rest of the State herring purse seine fisheries.

Proposal #237 – OPPOSE, Change specifications for herring purse seine to reduce length of nets for the Sitka Sound commercial herring fishery. PVOA members are unable to support this proposal that would reduce the length of Sitka herring nets from 200 fathoms to 150 fathoms due to the proposal’s attempt to reduce catching power without adequate justification.

Proposals #238 & #239 – OPPOSE, Establish closed waters for the Sitka Sound commercial herring fishery in order to provide an area only open for subsistence. PVOA members are unable to support proposals that close areas to commercial herring fishing to provide a subsistence-only area because closure of an area to commercial harvest does not ensure that herring will spawn in that area. As the herring biomass increases, ADF&G observed herring spawn have reached record levels. In reviewing ADF&G observed spawn maps, there appears to be ample opportunity for subsistence harvest in the Sitka Sound area. ADF&G works closely with local subsistence harvesters and the commercial herring fleet to ensure that commercial harvest is minimized or not conducted in core subsistence areas. The efforts of the Herring Conservation Alliance to establish a network of transport vessels and subsistence harvesters has yielded successful results. Sitka Sound permit holders are fully committed to ensuring the partnership continues to ensure that subsistence needs are being met.

Proposal #240 – OPPOSE, Re-allocate Sitka Sound herring to provide up to 1,000 tons of herring for commercial bait when the sac roe fishery GHL

exceeds 10,000 tons. Although PVOA members are supportive of the concept of increasing the availability of bait fisheries, they could not support the proposal without support of the majority of permit holders. The winter bait fishery is currently underutilized, and further development of that fishery is encouraged before reallocating Sitka Sound sac roe harvest.

Proposal #241 – OPPOSE, Revise the herring allocation for Hobart Bay to eliminate winter bait and to provide all the available GHF for gillnet sac roe. PVOA is unable to support this proposal that would reallocate all winter bait quota in Hobart Bay to the gillnet sac roe fishery. It is our understanding that the winter bait fishery in Hobart bay has only taken the available quota once since 1997 when the Board split the two fisheries in the area.

Proposal #242 – OPPOSE, Increase threshold for the West Behm Canal Herring Fishery from 6,000 tons to 15,000 tons. PVOA is opposed to this proposal that would arbitrarily raise the threshold for herring harvest in West Behm without basis. The Department opened the Behm Canal fishery in 2011 and it will open again in 2012. The fishery news release for the 2012 stated: “The department uses a Biomass Accounting (BA) model to estimate abundance and to forecast the West Behm Canal herring stock. Herring abundance is estimated, in part, using aerial surveys designed to map spawning locations and record the length of shoreline with spawn, followed by dive deposition surveys which estimate the density of eggs and the average width of the spawn. In 2011, the department documented 17.9 nautical miles of herring spawn. **This is the sixth highest length of herring spawn documented by the department in West Behm Canal since 1970.**”

Proposal #243 & #244 – OPPOSE, Eliminate rotational fishing opportunity for purse seining in West Behm Canal herring sac roe fishery and allow only gillnet sac roe fishing. PVOA is opposed to this reallocative proposal that needlessly eliminates the purse seine fishery in Behm Canal. Both the gillnet and the seine fisheries are important to the diverse herring fleet in Southeast Alaska.

Proposal #245 - OPPOSE, Allocate of equal shares in the Southeast sac roe fishery in Section 1-E and 1-F by designation of permit holders to harvest herring for others. Although this proposal does not specify purse seine or gillnet, PVOA is not supportive this action that would allow a permit holder to lease a permit so they do not have to participate in the fishery. In an equal share fishery, each permit holder should be present to harvest available herring.

SPORT SALMON

Proposal #246 – SUPPORT, Clarify that the management measures for the use of two rods is for king salmon only. PVOA supports this Department generated proposal that clarifies sport fishing regulations.

Proposal #247 - Develop a management plan to protect and enhance the Juneau roadside sport fisheries. Although the proposal seeks to establish a

management plan for sport fish, without a full understanding of the impacts to all fisheries in the region we are unable to support this proposal. It is our understanding that this proposal seeks to protect habitat for important fish stocks and we are unsure as to how the Board can assist in the development of the proposed management plan. We look forward to the Department comments that may clarify the impacts of this proposal.

Proposal #248 - OPPOSE, Change the definition of “bag limit” for anglers fishing from a vessel. PVOA is opposed to this proposal that would liberalize the bag limit definition and may encourage the “meat hunting” mentality regarding sport fishing as opposed to a focus on the experience of recreational harvest.

Proposal #249 – SUPPORT, Establish nonresident annual limits for sockeye, coho, chum, and pink salmon in the Southeast Alaska Area. PVOA supports this proposal that would establish reasonable expectations for non-resident anglers and would place a higher value on the experience of recreational harvest and discourage the “meat-hunting” mentality. Each of these species are important to the regional economy as well as subsistence harvesters, and it is important to establish reasonable limits for visitors to Southeast Alaska as sustainability is the cornerstone of fisheries management in this state. Given the Southeast Regional Advisory Council submitted and supports this proposal, it indicates that the subsistence users in Southeast Alaska are also concerned with the impacts that unlimited harvest of salmon has on the expectations of non-resident recreational anglers.

Proposal #250 – OPPOSE, Allow retention of king salmon in the fresh waters of the Southeast Alaska Area. The Southeast Alaska king salmon fisheries are under treaty obligations with Canada and are carefully managed by ADF&G to protect seiners, gillnetters, trollers, personal use, sport, and subsistence harvesters. Given the success of ADF&G management of king salmon in Southeast, we are unable to support this proposal that would allow in-river harvest of king salmon. King salmon are the longest living of the salmon species in Southeast, and it is important to continue to protect spawning habitat as well as spawning king salmon.

Proposal #251 – OPPOSE, Allow the use of two rods by non-guided anglers in salt water. The current regulations allowing the use of one rod and reel in the summer months and two rods and reels in the winter months provides ample opportunity for non-guided anglers to harvest king salmon.

Proposal #252 – SUPPORT, Allow the use of power assisted reels by disabled anglers only. PVOA is supportive of actions that continue to promote the recreational fishing experience and discourages the “meat hunting” mentality. The increased use of power assisted reels in Southeast Alaska has highlighted the need to ensure that meat hunting is discouraged but that disabled anglers are still able to experience Southeast’s recreational opportunities.

Proposal #253 – SUPPORT, Establish system for distinguishing between

vessels participating in hand troll and guided charter fishing in Southeast Alaska. PVOA is supportive of this action especially if it would not allow charter fishing and hand trolling by the same vessel in the same day OR would regulate that all sport caught fish must be unloaded before a commercial trip begins to discourage the ability to fish in an area closed to commercial fishing

Proposal #255 – OPPOSE, Establish a Taku River king salmon sport fishery. The Southeast Alaska king salmon fisheries are under treaty obligations with Canada and are carefully managed by ADF&G to protect seiners, gillnetters, trollers, personal use, sport, and subsistence harvesters. Given the success of ADF&G management of king salmon in Southeast, we are unable to support this proposal that would allow in-river harvest of king salmon. King salmon are the longest living of the salmon species in Southeast, and it is important to continue to protect spawning habitat as well as spawning king salmon.

Proposal #256 – SUPPORT, Prohibit snagging at the mouth of Auke Creek. PVOA supports this Department generated proposal that helps protect fish in-stream.

Proposal #258 – OPPOSE, Reopen Sitkoh Bay Sockeye sport fishery. PVOA supports allowing the Department to open fisheries when data indicates an opening is warranted.

Proposal #260 – OPPOSE, Liberalize king salmon regulations in the vicinity of Ketchikan. PVOA is opposed to this proposal that would liberalize the bag limit for sport harvesters to catch hatchery raised king salmon and would not allow these kings to count against the annual limit. We are also concerned with the impacts to treaty king salmon that may be intercepted in the area.

Proposal #261 – OPPOSE, Increase king salmon bag limits in the vicinity of Neets Bay. PVOA is opposed to this proposal that would liberalize the bag limit for sport harvesters to catch hatchery raised king salmon in Neets Bay without a better understanding of the impacts to the directed commercial fishery. Without the commercial fleet participating in the broodstock programs and cost recovery programs to help provide fish and funds to Alaska's hatcheries, the hatcheries in Southeast would not be able to operate.

SUBSISTENCE AND PERSONAL USE

Proposal #269 – SUPPORT, Establish a catch report card system for subsistence, personal use, and sport finfish fisheries. PVOA supports this proposal that would allow for adequate data collection regarding finfish harvest by subsistence, personal use, and sport fishers in Southeast Alaska. The Board in the past has determined that due to the inability of the Board to mandate ADF&G to spend money. However the continued submission of similar proposals highlights the concern regarding adequate data collection in all fisheries. We are fully supportive of advocating for these funds at the State Legislature to further Alaska's legacy of sustainability.

Proposal #270 – SUPPORT, Require a permit for subsistence or personal use harvest of sablefish. PVOA supports this Department generated proposal that would allow for adequate data collection regarding sablefish harvest by subsistence and personal use fishers in Southeast Alaska. Sablefish are fully utilized, economically important to commercial and charter harvesters, and the biomass is on a continued decline in Southeast. Ensuring that accurate numbers of harvest by all users is collected should be a priority for this species.

Proposal #271 – SUPPORT, Clarify prohibitions to commercial, subsistence, and personal use fishing by commercial sablefish permit holders. PVOA members are fully supportive of this Department generated proposal that clarifies when subsistence sablefish may be harvested. Good stewardship and less confusion will result by not allowing subsistence or personal use harvest during an open fishing period and requiring that all commercial sablefish are unloaded from a vessel before subsistence or personal use fishing.

Proposal #272 – SUPPORT, Clarify subsistence herring and herring spawn customary and traditional use findings for waters of Sections 3-A and 3-B. PVOA supports this Department generated proposal that reduces redundancy.

Proposal #273 – SUPPORT, Require a permit for subsistence herring eggs on branches in Sitka Sound or alter the harvest monitoring program to measure landed weights. PVOA is supportive of this proposal that will help gather better data regarding subsistence herring roe harvest to ensure that adequate data is available to determine if subsistence needs are being met. Subsistence is not only a means of acquiring food in Alaska but also a way of life. In order to assist in the collection of data, PVOA working through United Fishermen of Alaska (UFA) asked for an increase in the ADF&G subsistence budget in 2012 and we are pleased to report that the Governor included additional funds in his version of the budget. We are fully committed to helping ADF&G acquire the funds necessary to provide the Board with representative data of subsistence harvest in Southeast.

Proposal #274 – OPPOSE, Modify the personal use fishery for salmon in Southeast Alaska to target king and coho and to include additional gear types. PVOA is opposed to this proposal that will allow permits for personal use salmon fishing with commercial gear types. This proposal would enable the ability to meat-hunt for salmon in Southeast and would provide a level of efficiency that is not needed for personal use harvest.

Proposal #276 – OPPOSE, Change the subsistence sockeye fishery in the Klawock River from five to seven days per week. PVOA is opposed to this proposal that would lengthen the subsistence sockeye season without biological justification.

Proposal #277 – OPPOSE, Allow dip nets in the Taku River for personal use. PVOA is opposed to this proposal that will allow for the use of dipnets in the

personal use fishery. It is our understanding that this proposal could have unintended consequences on Treaty fish, and that a personal use set-net fishery currently exists where the limit is 85 sockeye. This proposal is precedent setting, in that it would create the first dipnet fishery in Southeast.

Proposal #278 – OPPOSE, Extend the personal use fishery season on the Taku River from mid-June through August. PVOA is opposed to this proposal that could have unintended consequences on Treaty fish.

Proposal #279 – OPPOSE, Increase Taku River sockeye salmon daily and annual bag limit per household based on number of persons in the household. PVOA is opposed to this proposal that could have unintended consequences on Treaty fish.

Proposal #280 – SUPPORT, Clarify that subsistence in District 15 includes Lutak Inlet and opens the day before commercial openings. PVOA supports this Department proposal that provides clarity on subsistence salmon fishing.

SALMON

Proposals #289, #290, #291, #295, #296, #297, #298, #308, #311, #315, #323, #324, #325, #331, #332, #333, #334, #335, #336, #338, #340, #343, #344
PVOA supports the current allocation plans in spirit. Proposals that reallocate fish from one salmon gear group to another is best worked out by United Southeast Alaska Gillnetters (USAG), Alaska Trollers Association (ATA), and Southeast Alaska Seiners (SEAS). We support the results of the Industry Consensus and the Joint Regional Plan Team (JRPT) on salmon gear group issues.

Proposal #285 – Repeal the 58' vessel limit in the Southeast salmon purse seine fishery. PVOA members were unable to reach consensus on this proposal that would repeal the length limit on seine vessels with a form of permit reduction to reduce capacity. The Southeast seine fleet is currently undergoing a permit-reduction process that if successful would eliminate the reasoning for adopting this proposal.

Proposal #286 – Increase length limit for Southeast salmon seine vessel to 75 feet. PVOA members find it difficult to support this proposal without sufficient support from permit holders. Given the 58' limit was set in place decades ago, the discussion on whether the 58' limit is relevant or necessary may be warranted. Currently, seine vessels are the only vessels participating in the Southeast salmon fisheries that are limited in length. A large portion of Southeast seine permit holders participate in other fisheries that constrain the vessel length to 58' which would put them at a disadvantage with regards to vessel length. We look forward to discussing this proposal further at the BOF meeting.

Proposal #287 – OPPOSE, Exclude stern ramps and rollers in the 58 foot length limit for the Southeast Alaska area. PVOA members are unable to support this proposal that will allow the use of stern ramps and rollers without

adequate justification. The proposal cites the allowance of bulbous bows; however bulbous bows are used to increase vessel fuel efficiency and stability.

Proposal #288 – SUPPORT, Allow seine vessels to transport two seine nets. PVOA members support this proposal that would allow for vessels to carry two seine nets in the salmon seine fishery. Currently Southeast herring seine vessels and salmon gillnet vessels are allowed to carry two nets. Given vessels are restricted in the size of net they are allowed to fish, there is no reason that a vessel cannot carry or transport two seine nets.

Proposal #293 – SUPPORT, Provide minimum mesh size of six inches in districts 1, 6, 8, 11, or 15 by emergency order when needed to conserve sockeye and access chum. PVOA supports this Department proposal that will clarify conflicting regulations and will limit fishing to a six-inch mesh or smaller net during a one-week period in times of high king salmon abundance.

Proposal #294 – OPPOSE, Require reporting of commercially-caught salmon and steelhead retained for personal use. PVOA opposes this proposal that would require commercially caught salmon and steelhead retained for personal use to be reported to creel census personnel at the point of offload. Current regulations require commercially caught salmon and steelhead taken for personal use to be reported on the offloading fish ticket. This process is more effective in gathering data than the proposal, as creel samplers currently do not collect data on tender vessels and many processing plants are located in communities without creel census personnel. Although the proposal seeks to gather additional data on personal use take, it will likely result in less information being reported. A more appropriate action would be to ask ADF&G and to issue written reminders of the current regulation that requires commercially caught salmon and steelhead taken for personal use to be reported on the offloading fish ticket.

Proposal #299 – OPPOSE, Extend commercial closed waters in Taku Inlet to Point Greely–Point Bishop. PVOA is opposed to this proposal that would move the gillnet closed area line without adequate justification. This proposal could also have unintended consequences on Treaty fish.

Proposal #319 - Increase troll opening in Chichagof Pass to seven days a week to access enhanced Anita Bay chum. PVOA members are looking forward to further discussion and Department comments to understand the effects of altering the Anita Bay rotational fishery to allow seven days per week harvest by the troll fleet.

Proposal #328 – SUPPORT, Allow new gear type for broodstock capture in Districts 12 and 13. PVOA is supportive of this proposal that would allow for additional gear types to be used in the capture of broodstock in Hidden Falls and Deep Inlet. This proposal would increase efficiency and would allow for more control over the capture timing of broodstock which would reduce the likelihood of fishery closures to ensure adequate broodstock harvest.

Proposal #337 – SUPPORT, Establish a new Herring Cove THA management plan to distribute harvest between commercial, sport, and personal use fisheries. PVOA supports this Department proposal that will establish a Terminal Hatchery Area (THA) to access enhanced hatchery salmon between commercial troll, sport and personal use fisheries at Herring Cove.

Proposal #339 – SUPPORT, Change the opening date for the Anita Bay THA to May 1. PVOA supports this Department proposal that eliminates the need for EO authority to open and close Anita Bay and sets these dates in regulation.

Proposal #341 – SUPPORT, Establish a THA in Southeast Cove for seine and troll gear. PVOA is supportive of the establishment of a THA in District 9. This action will establish a cost recovery system and would utilize Gunnuk Creek capacity of chums.

Proposal #342 – Establish a registration fishery for the Hidden Falls THA to replace cost recovery harvest with tax assessment. PVOA members are supportive of the concept of this proposal that would establish a registration fishery for the Hidden Falls THA to replace cost recovery harvest with a tax assessment. We look forward to further discussions regarding cost recovery changes in Hidden Falls that will minimize unnecessary fishery closures to ensure cost recovery fish is harvested.

Thank you for the consideration of our comments on these proposals. We look forward to further discussing these proposals at the January 2012 meeting in Petersburg where PVOA members will be available to provide additional information. If we can answer any questions or provide any further details, please feel free to contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. Curry', written in a cursive style.

Julianne Curry
Director

Dear Chairman Jsohnstone and Board Members,

I'm a resident commercial longliner-troller fishing out of Port Alexander for over 30 years. I bought a Chatham black cod permit over a year ago.

Proposal 216: OPPOSE

Chatham black cod stocks have been declining. It makes no sense to get rid of the annual limit. It makes more sense to decrease the annual limit. When stocks are in decline you conserve, right? (In the last ten years the commercial Chatham quota has dropped from over three million pounds to the current 882,000 pounds.) This proposal would be reallocating fish from a depressed resource to the newest user group, nonresident sablefish anglers. This would be against the Board of Fisheries allocation criteria. I think nonresident anglers are sometimes given too generous of limits, bag and annual, or no annual limits in some cases. Nonresidents shouldn't be taking home large quantities of each fish they catch. Isn't one 50-lb of mixed species enough? If they want more fish than this, they should buy it from a tourist oriented business that can ship fish anywhere.

Proposal 270: SUPPORT

Current regulations allow unlimited subsistence harvest of sablefish. Good record keeping is essential. Reasonable annual limits could be set that could support a family without inviting abuse.

Proposal 212: OPPOSE

The charter fleet should live within their allocation. The commercial fleet will need their rockfish allocation for bycatch for the halibut fishery if it increases. Also, for the first time in six years, ADF&G allowed a directed rockfish fishery in the Central Southeast Outside area. This fishery would not have been allowed if the commercial allocation was reduced.

Thank you for your time and consideration,



Marty Remund
F/V Teasha, Port Alexander

PREPARED BY: Jan Rottschaefer

DATE: 2-9-12

PROJECT TITLE: 8316 S Tongass Hwy
Ketchikan, AK 99901

To whom it may concern,

I would like to submit a comment about shore fishing in Herring Cove. I am sympathetic to people without boats who want to enjoy fishing. I wish there was a way to accommodate them but so far I haven't heard any reasonable suggestions.

Among the problems for those of us who live in Herring Cove is parking all along Tongass. Depending on the tides people start arriving at 3-4 am. If you happen to have your window open the noise from the parking + people talking on the beach can make sleeping difficult.

Another difficulty is harassment of the bears. The entertainment for a few is to see how close they can lure a bear by leaving fish or fish parts on the shore. I've also heard of fishermen threatening bears in various ways to protect fish they've left unattended. I have personally observed a young bear being chased down Powerhouse Rd with a car actually leaving the road to pursue the bear. The fishermen(?) appeared to have been drunk.

A third concern is the fishing tackle left behind by shaggers. It's not safe to walk a dog around the mouth of the creek at low tide + the enormous amounts of fishing line that are in the rocks + sand is a threat to the huge number of birds who live + migrate through here.

And of course, the lack of bathrooms.

Thanks for hearing my concerns.

Jan Rottschaefer

ATTENTION: BOARD OF FISH COMMENTS

Dear Board of Fish members.

Please include the following comments in the 2012 Board of Fish meetings.

Written testimony in support of Proposal #314.

I am in strong support of proposal #314 that would allow troller's an opportunity to harvest mainly SSRAA produced coho, after the 20th of September, in districts 1, 6, and 8.

I think adding more fishing days in these districts would have a beneficial impact on the current allocation imbalance. In fact allowing trolling to be extended near any hatchery with late returning coho would be of help in the regard.

Allowing troller's access to these fish later in September makes sense because in recent years, in general, hatchery coho have been returning later in the season. These are hatchery fish that troller's have helped to produce by paying the 3 percent aquaculture tax.

When you consider the 5 year allocation average, the gillnet fleet has been well over their target percentage of 24 to 32 percent, while the troll fleet has been under their target range of 27 to 32 percent. This allocation imbalance can not be solved if gillnetter's are allowed to fish on mostly hatchery stocks after September 20th, while the troller's season is over on September 20th.

For example in 2010 the total average weekly coho gillnet catch rates in districts 6 and 8 were above average throughout the season. Weeks 35 through 38 had an above average hatchery coho component.

In 2011 by the time you get to September 24th, the average percentage of hatchery coho catch rate, in the traditional gillnet fishery, in district 1, is as high as 48 percent. For the same time period in district 6 it is 60 percent. The later in the season, the higher the percentage of hatchery fish. The trend continues upward, in some districts, on into October.

In the 2011 troll fishery, traditional and experimental, when the season ended on September 20th, the coho salmon catch rate was 62 percent hatchery and on an uptic . If Proposal #314 were adopted, it would give troller's additional access to these specific areas known to have a high hatchery coho abundance.

I have seen it happen many times over the course of a 33 year career, which has been mainly trolling out of Wrangell, where I have been tied to the dock with the troll season finished on September 20th, only to watch the gillnet fleet continue to fish, on into October some years, with good results on mostly hatchery produced coho.

I would like to see this frustrating situation corrected by adopting Proposal #314 and allow troller's more fishing time in late September. Data shows a large percentage of these fish have been paid for, in part, by troller's

Written testimony in opposition of Proposal #312

Being a troller, I find proposal #312 an easy one to oppose for numerous reasons, and I definitely oppose it.

I've heard it said many times and I've said it myself, "Alaska is a role model for fisheries management". Historically, in my opinion, the Department has done a tremendous job managing the troll fishery with protection and conservation being their priorities.

I would disagree with the wording of this proposal that "gillnetter's and inside water fisherman are the only ones to bear the brunt of coho conservation". I would also disagree that wild coho salmon will definitely reach inside waters if the outside troll fleet is automatically shut down. There is no conclusive data to support that statement. However if you look at the catch rate data and compare the gillnet harvest to troll closure length you will see there is no correlation here. In other words the number of days the troller's are shut down has no relative impact on gillnet harvest.

There are other annual factors to look at when determining coho movement to inside waters. I'm not a biologist, but I know from years of experience that ocean conditions can be as unpredictable as the weather. For example, a dryer than normal summer can have an effect on coho moving to inside waters. It could be an El Nino year, or even changing feed patterns can all have major impacts on coho moving to the inside.

Another potential impact on coho movement is the fact that more troller's fished hatchery chums the last couple of years, which has allowed more coho to move to inside fisheries.

With so many different conditions influencing coho stocks, and the distribution of these fish, the Department has to be flexible enough to respond to the in season management plan and not be locked into a USAGA proposal that, as the data shows, will not have the desired effect they say it will.

In the what will happen if nothing is done section of Proposal #312 it states that "the annual troll closure should occur automatically every year to allow for conservation and the length of the closure should be based on coho abundance". Isn't this exactly what happens now? The Department manages the troll fishery based on abundance and then automatically closes the fishery down for allocation and conservation.

Please don't support Proposal #312.

Thank you. Sincerely, Mike Rugo



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Board of Fisheries

February 24 – March 4, 2012

Sitka Sac Roe Herring Proposals

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BOARDS

Dear Board of Fish Members:

I oppose proposals 230, 231, 232, 238, & 239:

When I first came to Alaska in 1989, I went to work for Ocean Beauty in Kodiak. After working there a couple of years as the dock foreman, I was promoted to superintend on Ocean Beauty's floating processor the M/V Ocean Pride and spent three years between Dutch Harbor and Bristol Bay. I also spent five seasons in Bristol Bay working for Ekuk Fisheries and Leader Creek. I was hired by Silver Bay Seafoods in 2008 as the plant manager for the Sitka facility and arrived in Sitka on March 5th.

When I arrived at the plant on the 5th, the crew at Silver Bay was busy getting the facility ready to process Sac Roe Herring for their first time. I could sense that it was a very intense and exciting time for everyone. I could also see there was a lot of work that needed to be finished before the first herring opener, and based on historical information, they had ten days - maybe two weeks at best. It was a steep target and seemed to be almost unattainable. To the untrained eye (and even to the trained professional), it looked like mass confusion. A term the kids use today crossed my mind - "OMG."

I could also see there were a lot of dedicated hard working people, who were tired and a little overworked but happy to be part of something exciting. No one was complaining. Silver Bay Seafoods was the new kid on the block and everybody in the industry wanted to see what they were going to do next. It was very easy to join in the excitement and match their enthusiasm.

That was a pretty crazy first season. There are quite a few war stories told about it - some of which are pretty funny. It's much easier to look back and laugh at it today. Being part of something like this - the camaraderie; the blood, sweat and tears; the hard work; the

dedication to make things go right - doesn't happen very often in most people's lives and some people never get to experience anything like it at all. Sac Roe Herring changed all of our lives.

Innovation, Accomplishments, Perseverance and Hard Work

Silver Bay's goal was to take the processing of herring to a new level - to process herring at a higher volume than any other processing facility and to do it more efficiently, while maintaining above-standard quality and freshness. SBS accomplished that goal and improved on it each succeeding year. In 2011 we accomplished unprecedented production numbers, (reducing the need to outsource production to Canadian processing plants)

Silver Bay's Commitment to The Resource - Finding Ways to Expand into Other Markets, A Dedicated Crew and Their Contribution to Doing That

In 2011, we started sex sorting. We are working on developing markets for the male herring and looking into other markets for the roe and flesh as well. Silver Bay is committed to maximizing herring revenue, and this filters back into the community of Sitka. The herring operation we have today is one of the most efficient processes I have ever seen or been involved in. This was accomplished by a lot of hard work and dedication from the Silver Bay team of employees.

What Herring Means to Our Employees and The Community

Most of the employees that started that first herring season in 2008 have stayed with us (myself included) and have become full time residents of Alaska. Personally I wouldn't be able to live here with my wife and two teenage boys if it weren't for the extra income I get from herring. If not for herring, I would most likely have to move back to Washington and only come up during the summer salmon season.

We started out with a crew of about 100 employees the first year and have added more each year. This year (2012), we will have a crew of 190 people. And each year we have added more year-round Alaska employees to our roster, employing every local resident who applies and fulfills the terms of the job. Sac Roe Herring is important to all of our employees. They take a lot of pride in what they have accomplished, and, in return, herring season allows us to offer our key staff and core processing crew the opportunity to earn more year-round money, which allows them to maintain residency in Alaska and become part of the local community. We also

hire seasonal workers from other parts of Alaska such as Kodiak, Anchorage, PWS sound and other parts of SE Alaska.

Without the extra season's income, they would not be able to maintain residency in Alaska, and we would also lose them to other companies in the lower 48. This would cause us to have to hire new employees every year, and we wouldn't be able to attract the professional employees we do now. That would mean hiring people with less experience and qualifications (the ones at the bottom of the employment pool.) **Those aren't the type of people we want to attract to SBS or to Alaska,** and the money transient employees earn would go back to the lower 48. Sac Roe Herring has brought a lot of highly professional people to Alaska most of which have taken up residency here. They are hardworking people with good morals - the kind of people you would want to have as your neighbor. This wouldn't be possible without this fishery.

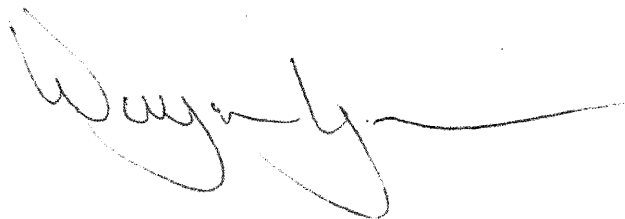
Sac Roe Herring helps out the community because the income earned by these employees stays in Alaska and helps sustain the local economy. A good example of that: this year three of our employees bought houses in Sitka. That wouldn't have happened without herring. The fishery brings families to Alaska, and they have kids that go to the local schools and participate in sports and families who buy groceries and supplies in town. Silver Bay Seafoods and many of our employees participate in local fundraisers and donate to local charities. Alaska needs more people like this and without herring, they won't be there. Sitka's economy is struggling, the population has been flat for 15 years, tourism is down, and sales taxes receipts have declined; if it weren't for the growth of Silver Bay Seafoods the numbers for Sitka would be even worse. In fact, raw fish tax is one income source for Sitka that has increased in the past four years.

Conclusion

Sac Roe Herring is important not just to Silver Bay Seafoods but to all of us. There are so many dynamics that benefit from this fishery, and every one of them would be hurt - or may even cease to exist - if the fishery is drastically reduced, restricted, or both. Restricting this fishery to the point where it becomes economically impossible for the commercial fishery and fisherman to make a profit will not only end the fishery – but also will end the personal and community-wide economic benefits we enjoy because of it.

Best Regards

Wayne Unger



Silver Bay Seafoods LLC

Southeast Alaska Fishermen's Alliance

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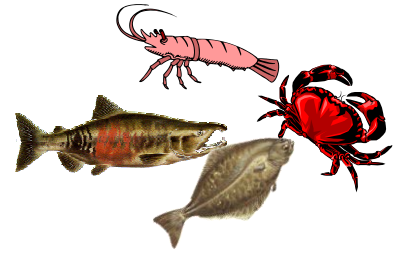
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February 8, 2012

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

RE: Board of Fish Southeast & Yakutat Finfish Meeting Comments

Dear Chairman Johnstone & Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a membership based association representing our members involved in salmon, crab, shrimp and groundfish fisheries of Southeast Alaska / Yakutat & Gulf of Alaska.

SEAFA supports the Regional Planning Team (RPT) Industry Consensus agreement. We participated in the process and support the positions listed in the agreement.

Proposal #141: Oppose

SEAFA opposes the establishment of a Marine Conservation Zone around Cache Island and the prohibition of fishing by non-residents for bottom fish and shellfish. The proposal does not provide sufficient justification or information on the affect a marine conservation closure would have on the area. If fish resources are depleted to the extent that a marine conservation zone is necessary, than the prohibition on bottom fishing and shellfish should be for all users not for non-residents only. If the intent is to close an area to allocate harvest for subsistence and personal use only then the proposal should state that is the basis of the proposal and state how it would affect each of the users.

Proposal #142: Oppose

SEAFA opposes the establishment of a Marine Conservation Zone in a portion of Behm Canal and the prohibition of fishing by non-residents for bottom fish and shellfish. The proposal does not provide sufficient justification or information on the effect a marine conservation closure would have on the area. If fish resources are depleted to the extent that a marine conservation zone is necessary, than the prohibition on bottom fishing and shellfish should be for all users not just non-residents.

Proposals #143: Oppose

SEAFA opposes the establishment of a Marine Conservation Zone in the Naha Bay to Donnelly Point to Cache Island to Indian Point and all places in between and the prohibition of fishing by non-residents for bottom fish and shellfish. The proposal does not provide sufficient justification or information on the effect a marine conservation closure would have on the area. If fish resources are depleted to the extent that a marine conservation zone is necessary, then the prohibition on bottom fishing and shellfish should be for all users not just non-residents.

Proposals #144: Oppose

SEAFA opposes the establishment of a Marine Conservation Zone in the Naha Bay to Donnelly Point to Cache Island to Indian Point and all places in between and the prohibition of fishing by non-residents for bottom fish and shellfish. The proposal does not provide sufficient justification or information on the effect a marine conservation closure would have on the area. If fish resources are depleted to the extent that a marine conservation zone is necessary, then the prohibition on bottom fishing and shellfish should be for all users not just non-residents.

Proposal #200: Support

SEAFA supports ADFG's proposal to clarify that the post-processed portions (head, tail, fins etc) of species prohibited for use as bait may be used. We appreciate the Dept recognizing the unforeseen effect of the prohibition and allowing for further use of post-processed waste products for bait.

Proposal #206: Support if Amended to Include all SE & Yakutat

SEAFA supports the establishment of spiny dogfish fisheries throughout Southeast and Yakutat not just the Ketchikan area. If the Board of Fish established a fishery framework and allowed fishermen to work collaboratively with the Dept on development of fisheries where appropriate, this would economically benefit the state, coastal communities, processors and fishermen that would participate in the fishery.

Proposal #207: Support

SEAFA supports relaxing the bag limit for spiny dog fish if an angler is truly interested in harvesting the species and utilizing the meat. We do not support a relaxing of bag limits if the meat of the spiny dogfish is not going to be utilized.

Proposal #208 & 209: Support

SEAFA supports these ADFG housekeeping proposals. It clearly defines the season length and that ADFG can close the season when the GHF is reached by Emergency Order.

Proposal #212: Oppose

SEAFSA opposes the proposal to reallocate the Demersal Shelf Rockfish. The Board of Fish has charged both sectors in 2006 to look at ways to decrease their own bycatch rather than ask for reallocation of the fishery resource. One method that the Commercial sector has worked towards this goal is by the development of the Fishery Conservation Network (<http://www.alaskasown.com/fishery-conservation-network.php>) While the commercial sector has not used their full allocation every year, it is necessary to maintain the allocation for when the halibut resource rebounds and the rockfish harvest incidental as bycatch to halibut fishing increases with more fishing effort. Hopefully there is a reversal of the halibut stocks in Southeast Alaska as the quota was slightly increased for the commercial sector and the charter sector stepped up in their GHF tiers to 933,000 pounds that allowed for a relaxation to the 37" maximum halibut required in 2011. Rockfish is also one of the few non-limited entry fisheries for a young fisherman to get involved in and we support keeping this option available for entry-level opportunities by not changing the allocation between sectors. Since rockfish are a long-lived, slow growing species, leaving rockfish in the water in years of low halibut abundance is not a bad thing.

Proposal #214: Support

SEAFSA supports ADFG's proposal to standardize sablefish retention and reporting requirements between Chatham and Clarence strait fisheries. The Dept summarized the issue and benefit of this proposal's passage.

Proposal #215: Support (corrected proposal published)

SEAFSA supports allowing permit holders to participate in the stock assessment surveys. By allowing permit holders to participate in the stock assessment and use their equal quota share, it allows overall for less sablefish to be harvested from the biomass than conducting a separate stock assessment using fee receipts.

Proposal #216: Oppose

SEAFSA opposes this proposal to eliminate the annual limit for non-resident sablefish anglers. The sablefish allowable harvest objective (AHO) in 2008 was 1,508,000 rd lbs and has been reduced to 880,000 AHO in 2011 or a 42% decrease in allowable harvest. The Dept. is obviously concerned about the amount of sablefish being harvested as they submitted proposal # 270 to require permits and accounting from the subsistence and personal use fisheries. At the 2009 Board of Fish meeting the Dept. explained that they subtracted 3% of the allowable biological catch (ABC) off the top to account for sport, personal use and subsistence. In 2011 with recording data in charter logbooks, 3% was subtracted for just the guided sport fishery and an additional 2-1/2% was subtracted for the unguided sport, personal use and subsistence fisheries. This shows that the guided charter fleet was harvesting more sablefish than estimated at the time of the 2009 Board of Fish meeting and that the overall fishery has been and is still in a decline. Based on the current status of the sablefish stocks, the annual limit should not be eliminated.

Proposal #217-222: Oppose

SEAFA opposes these proposals to change the lingcod allocations. This allocation was developed through a lengthy process involving all the advisory committees in Southeast Alaska and Yakutat, ADFG and users and a thorough review of the allocation criteria and historic uses.

Proposal #223: Support

SEAFA supports clarifying that dinglebar gear is a single line.

Proposal #224: Oppose

SEAFA opposes changing back the regulation to allow the use of lingcod as bait. Lingcod is fully allocated and SEAFA does not support changing the allocation between user groups. Passage of proposal #200 would allow the use of post-processed lingcod scraps for bait.

Proposal 228-229: Support

SEAFA submitted and supports proposal #229 to change the mesh size for West Behm Canal to be consistent with the rest of the Southeast gillnet sac roe fisheries. We submitted a petition in 2011 that the Board of Fish adopted to repeal the specific mesh restriction of 2-1/4" contained within 5 AAC 27.131 (f) as an emergency rule. From data provided on the petition the "Trend lines for the data indicate that West Behm herring are consistently smaller in size for any given age class than Seymour Canal herring. The mesh size of 2-1/4" is not commonly used in any of the herring gillnet fisheries in Southeast Alaska. West Behm Canal is opened so sporadically that net suppliers do not stock 2-1/4" herring gear. Publication notice of a fishery is usually given in November and average length of time from ordering of a net to customs clearing is approx. 120 days. The statewide regulation requiring 2-1/8" mesh for gillnet sac roe fisheries has allowed for sustainable fisheries throughout the state and there is no reason why all of Southeast Alaska gillnet sac roe fisheries should not be consistent with the statewide regulation of 2-1/8".

Proposal #246: Support

SEAFA supports the proposal by ADFG to clarify that the use of two rods specified in the King salmon management plan is only for king salmon fishing by standardizing and clarifying the regulations.

Proposal #247: Oppose

SEAFA opposes this proposal but is not necessarily opposed to the concept of ADFG, DIPAC and USFS collaboratively working together to enhance the Juneau roadside sport fishery. The Board of Fish does not have the authority to mandate ADFG to spend funds on specific projects, ADFG already funds some local enhancement projects for sport fishing in the Juneau area working with DIPAC. The Board of Fish does not have the authority to secure easements to protect public access to roadside streams, lakes and ponds. Many of the

suggestions within this proposal does not consider the State's policies on genetics for enhancement projects and transport permits/permitting.

Proposal #248: Oppose

SEAFA opposes this proposal to allow boat limits instead of a daily bag limit per individual. Sport fishing is about the experience and the thrill of catching a fish. How disappointing to be on a charter vessel and not have an opportunity to catch a fish because someone else was luckier and caught fish before you did.

Proposal #249: Support

SEAFA agrees with the issue brought forward in this proposal that it is necessary to know the amount of fish being harvested. Salmon is an important species in Southeast Alaska. An alternative to annual limits would be to still require a harvest record that provides when, where, how many salmon are harvested. Since the proposal was submitted by the Southeast Regional Advisory Council it is apparent that the subsistence users of Southeast Alaska are concerned over the growth and use of the resources by non-residents. Providing reasonable annual limits provides a clear expectation that a non-resident is encouraged to enjoy the experience and not provide meat or pay for their trip to Alaska.

Proposal #251: Oppose

SEAFA opposes changes to the King salmon management plan. This is a plan that has been developed over a number of years, balances the needs between residents and non-residents, and allows for benefits to the resident angler and the use of two rods during certain times at specified levels of abundance.

Proposal #252: Support

SEAFA supports this proposal to allow power assisted reels for disabled or legally handicapped individuals ONLY. We submitted a proposal last cycle regarding the definition of a fishing rod and reel. Other West Coast recreational fisheries have the following regulations regarding the use of electric reels.

- *Mexico – The use of electric reels is restricted to disabled fishermen only, after written authorization for the Ministry before use*
- *Oregon – The following activities are unlawful: use of gurdies, winches or reels affixed to a boat to land fish (rod or line must be held in hand) except when used for retrieving crab rings or pots.*
- *Washington –Use a rodholder; leave your rod in a rodholder while playing or landing a fish if the rod can be easily removed from the holder; Use an electric powered reel attached to a pole; Use a downrigger if the line releases from the downrigger while playing or landing a fish.*
- *Canada - fish with a fixed weight (sinker) greater than 1 kg except on a downrigger line, in which case the fishing line must be attached to the downrigger by means of an automatic release clip.*

Proposal #253: Support

SEAFA supports an identification system to determine by visual sight when a vessel is participating in a charter fishery and when participating in the hand troll

fishery. This is particularly important during the spring King salmon fishery. At a minimum we would like to see a requirement that the CFEC numbers & HT are covered when participating in guided charter fishing trip.

Proposal #260: Oppose

SEAFA opposes an expansion of the Ketchikan THA for king salmon. This THA was established to have the greatest harvest of enhanced fish while minimizing interception of wild stocks. This is particularly important in consideration of king salmon opportunities because of the Pacific Salmon Treaty and our obligations under the treaty.

Proposal #269: Support

SEAFA supports accurate and timely accounting of all fishery resources in order to manage for and maintain sustainable fisheries. While we understand that the Board of Fish cannot pass a regulation that obligates the Alaska Dept. of Fish and Game to spend money, accurate accounting is critical to abundance based management. We need to learn from the lessons of other west coast states, for example Washington State uses harvest records similar to what this proposal recommends for adoption and charges user fees to pay for the program. We would support a letter from the Board of Fish to the Alaska State Legislature supporting the need for this type of accounting concept. Our members are commercial fishermen who also participate in sport, personal use and subsistence fisheries and in the past when we have viewed the statistics of personal use and subsistence fisheries it appears the amount of resources harvested has been greatly underestimated.

Proposal #270: Support

SEAFA supports ADFG's proposal to require subsistence & personal use permits and accounting of harvest. Sablefish is a declining resource and accounting for all removals is important in sound management of the stock.

Proposal #271: Support

SEAFA supports ADFG's proposal to clarify the current regulation using the interpretation that they have provided to the public. Chatham & Clarence permit holders may be inconvenienced from past practices but they may keep fish from their equal share or set personal use or subsistence gear after all their EQS is harvested.

Proposal #273: Support

SEAFA supports permit requirements and accurate accounting of herring eggs on branches for subsistence use. Having data of the amount of subsistence harvests would help in future decision making by the Board of Fish regarding ANS findings, and allocations between gear groups as conflict issues over herring are submitted every cycle.

Proposal #274: Oppose

SEAFa opposes this proposal to allow the use of commercial gear types for harvest of personal use fishery.

Proposal #288: Support

SEAFa supports this proposal to allow a purse seiner in SE Alaska to carry up to two seines onboard. In the Southeast Alaska drift gillnet fishery two nets are allowed to be carried on board as long as one is bagged and tied shut. We do not see why the seine fleet shouldn't have a similar provision for spare gear.

Proposal #289: No Action

SEAFa supports USAG in withdrawing this proposal as part of the industry consensus agreement to close district 5 to seining and open to gillnet fishing.

Proposal #290: No Action

SEAFa supports SEAS in withdrawing this proposal as part of the industry consensus agreement to increase seine fishing time in District 6 and reduce gillnet time in September.

Proposal #291: No Action

SEAFa supports SEAS in withdrawing this proposal as part of the industry consensus agreement to allow harvest of pink salmon along the Pt. Adolphus shoreline in District 14 during years of large abundance.

Proposal #292: Oppose

SEAFa opposes this proposal to change the season start times. We do have some members who support this proposal. While we do understand that some individuals would like the starting date to change in order to attend church and weekend events with family, we have other members who direct market their fish and changing the starting date would create problems with getting product to the marketplace. This discussion has occurred at the gillnet task force meetings several times in the past and there has never been support for the change. The Dept has also previously expressed concerns about starting a day later and getting data, sampling and other information for management.

Proposal #293: AMEND

SEAFa supports the intent of this proposal submitted by ADFG to clarify maximum and minimum mesh sizes in the gillnet fishery. As proposed this regulation change still does not address two possible situations that should be considered. The first is currently happening right now in both Districts 11 & 15 (proposal addresses 11 but not 15) where parts of the district a minimum 6" mesh restriction is implemented starting on the third Sunday to protect sockeye stocks at the same time 5 AAC 33.331 (d) requires the use of a maximum gillnet mesh size of six inches to protect king salmon. As with identical crab buoys, gillnet mesh is not that accurate that you could have an exact 6" mesh size. Our other concern is for those years when a directed Taku King fishery is not occurring and if there are significant conservation concerns over the Taku Kings

the Dept. would not be able to require a maximum gillnet mesh size of 6". The second possible solution would be to delete (d). Our proposed solution to this proposal is as follows:

5AAC 33.331

(d) In Districts 11, [and] or 15, through the fourth Saturday in June, the Commissioner may, by emergency order, establish a [the] maximum gillnet mesh size [is] of six inches.

(e) In Districts 1, 6, 8, 11, [and] 15, [during periods established by emergency order,] the Commissioner may, by emergency order, establish a [the] minimum gillnet mesh size [is] of six inches, except that . . .

Proposal #294: Oppose

SEAFa opposes this proposal as written. It is already required that fish used from the catch for personal use be written on the fish ticket. To require that a commercial fisherman find a creel census taker before being able to eat a fish during a fishing trip or find a creel census taker when you reach town after unloading fish at the tender is problematic, inconvenient and does not gain any additional data.

Proposal #295: No Action

SEAFa supports SEAS in withdrawing this proposal as part of the industry consensus agreement that would modify the drift gillnet fishery in Zimovia Strait and Chichagof Pass.

Proposal #296: No Action

SEAFa supports USAG withdrawing this proposal as part of the industry consensus agreement that would open the gillnet fishery in Section 6-D.

Proposal #297: No Action

SEAFa supports USAG withdrawing this proposal as part of the industry consensus agreement that would open the gillnet fishery in Section 6-D during the pink season when not open to seining.

Proposal #298: No Action

SEAFa supports USAG withdrawing this proposal as part of the industry consensus agreement that would limit District 5 seine fishery to 2 days per week to increase gillnet pink salmon harvest in District 6.

Proposal #299: Oppose

SEAFa opposes changing the gillnet boundaries in District 11. This area is an important area to access our portion of the US TAC of Taku sockeye under the Pacific Salmon Treaty.

Proposal #300: Support

SEAFA supports this proposal to allow fishing to occur in the fashion it has always been conducted and provides for additional safety by allowing permit holders to work together rather than by themselves. Accurate accounting is important, ADFG needs to know how many and where fish were harvested and that all fish are recorded on a fish ticket, does it matter how the proceeds from the boat load of fish is split.

Proposal #301: Oppose

SEAFA opposes relocating the boundary for commercial set net fishing on the Tsiu River to provide a sport fish sanctuary.

Proposal #307: Oppose

SEAFA opposes this proposal to allow the use of hand-powered downriggers in conjunction with fishing rods all season. We were at the Board of Fish meeting working with trollers, Dept. and Board of Fish members when this regulation was implemented and it was intentionally made to be in effect for the winter fishery only.

Proposal #308: No Action

SEAFA supports this proposal being withdrawn that would allow six trolling lines on specified inside waters of SE Alaska as part of the industry consensus agreement.

Proposal #310: Oppose

SEAFA opposes changing the allocation of Pacific Salmon Treaty kings between seasons by adding the enhanced hatchery kings as an add on to the GHR.

Proposal #311: Support

SEAFA supports allowing coho retention starting June 1st within the boundaries of the spring Chinook hatchery access areas. SSRAA produces an early coho return to Neck Lake that this prohibition on retention prevents the trollers from benefitting from. This proposal was supported in the RPT industry consensus.

Proposal #313: Support

SEAFA supports changing the season closing date to September 30th for the troll fleet. The Dept has the authority to close the season if there is a conservation concern as easily as they can extend the season date if there are sufficient coho for harvest by the troll fleet. The troll fleet due to the early closure date has trouble accessing SSRAA produced hatchery coho with the Sept 15 closure date. Access to the SSRAA coho's would help with the allocation imbalance on enhanced fish.

Proposal #314: Support

SEAFA supports allowing access to SSRAA produced coho salmon. Proposals 314-315 & 317 are trying to address access to hatchery coho by the troll fleet but

offer different solutions.

Proposal #315: Support

SEAFA strongly supports this proposal submitted by SSRAA and supported by the RPT industry consensus that allows additional access to SSRAA coho by extending the summer season in section District 1-F.

Proposal #316: Support

SEAFA supports this ADFG proposal to allow a continuous troll drag in section 1-E. Pulling and resetting all the troll gear is time consuming and a lot of work.

Proposal #317: Support

SEAFA supports maintaining a portion of District 1-E open to trolling until September 30th to access hatchery coho.

Proposal #318: Support

SEAFA supports this ADFG proposal to clarify language when trolling is open in District 1-F.

Proposal #323: No Action

SEAFA supports USAG withdrawing this proposal as part of the industry consensus agreement that includes only regional aquaculture associations in the Enhanced Salmon Allocation plan.

Proposal #324: No Action

SEAFA supports USAG withdrawing this proposal as part of the industry consensus agreement that separates the enhanced salmon allocation plan for northern and southern SE Alaska.

Proposal #325: Amend

SEAFA supports the proposal as amended by the RPT industry consensus agreement. This proposal requests the development of spring hatchery chum salmon troll fisheries modeled after the spring king troll fisheries. The industry consensus agreement requests that sub-district 114-50 (Port Althorp) and District 9 from the proposal, put a sunset date in 3 years on the regulation. While the RPT and SEAFA recognize that the troll fleet is below their enhanced allocation range, opportunities have existed that were not taken advantage of in the past. This fishery will be expanding into new areas, there is concern about the make-up/composition of the harvest and stocks, impact to other users and possible conflicts that require this fishery be expanded with care and conservatively. We support the industry consensus agreement for the development of a Spring Troll chum salmon management plan during the 3 years.

Proposal #326:

SEAFA is interested in reviewing the ADFG staff comments and Juneau Douglas Fish and Game Advisory committee comments on this proposal before

commenting on this proposal.

Proposal #327: Support

SEAFA supports this ADFG proposal to put hatchery open fishing periods in regulation.

Proposal #328: Support

SEAFA supports NSRAA's request for net pen broodstock capture system as a legal harvest type. This would benefit the fishermen and NSRAA.

Proposal #329: Support

SEAFA supports the development of a SHA for Port Saint Nicholas. This would define and allow the hatchery to start cost recovery operations in order to continue the program.

Proposal #330: Support

SEAFA supports NSRAA proposal to close a portion of Bear Cove in Silver Bay to protect broodstock. Protection of broodstock is critical to the long term well-being of the hatchery program.

Proposal #331: Comment

SEAFA supports the RPT industry consensus agreement on this proposal submitted by SSRAA to allow the SSRAA board of directors to manage Neet Bay Hatchery on a yearly basis to benefit the gear group(s) out of their range.

Proposal #332: No Action

SEAFA supports SEAS withdrawing this proposal to change the Neets Bay hatchery management plan to provide common property access based on the enhanced salmon allocation plan.

Proposal #333: No Action

SEAFA supports USAG withdrawing this proposal as part of the RPT industry consensus agreement for a 1:1 gillnet to seine fishing rotation for Neets Bay Hatchery.

Proposal #334: Support/Amend

SEAFA supports the RPT industry consensus to change the sunset date to 2014 instead of 2017 and continuing the 1:1 fishing time ratio between gillnet & seine in Anita Bay.

Proposal #335: Support/Amend

SEAFA supports the RPT industry consensus to change the sunset date to 2014 instead of 2017 and continuing the 1:1 fishing time ratio between gillnet & seine in Deep Inlet.

Proposal #336: No Action

SEAFA supports SEAS withdrawing this proposal as part of the RPT industry consensus agreement that would have changed Nakat from a gillnet only THA to a shared gillnet/seine THA.

Proposal #337: Support

SEAFA supports this ADFG proposal to establish a THA to access enhanced hatchery salmon between commercial troll, sport and personal use fisheries at Herring Cove.

Proposal #338: Support

SEAFA supports this SSRAA proposal to expand the Kendrick Bay THA to include the McLean Arm for commercial seining. The McLean Arm was approved by the RPT as a release site as an alternative to Kendrick Bay but the release levels of chum salmon in the area will be the same. The RPT industry consensus agreement supported this proposal.

Proposal #339: Support

SEAFA supports this ADFG proposal to set the date in regulation rather than having to issue EO to provide access to the Anita Bay THA from May 1st rather than June 1st. This is an early season opportunity for all gear groups that is appreciated.

Proposal #340: Support

SEAFA supports this proposal both from the standpoint of our salmon fishermen but also Dungeness crab fishermen. This proposal changes the closed areas to reduce the conflict between crab and salmon fishermen. We have now found that the hatchery king salmon tend to mill in the area that was closed and would be dark by the time the area was open and the fish harvested.

Proposal #341: Support

SEAFA supports this proposal for the development of a Southeast Cove THA. We attended and participated in the RPT where Kake Non-Profit Fishery Corporation was asked to submit this proposal.

Proposal #342: Comment

SEAFA realizes that this proposal still has some controversy surrounding the idea but we would point out that passage of this proposal would allow this type of cost recovery to occur but would not require it to be conducted this way but without passage of this proposal it could not occur. This really just provides flexibility in how cost recovery at Hidden Falls may be conducted and SEAFA supports the NSRAA Board of Directors.

Proposal #343: AMEND

SEAFA supports the concept in this proposal but was written such that unintended consequences occur. The intent of this proposal is to prevent having to write an EO every year for this fishery but as written this actually closes down

historically access to coho within the area by the dates specified in the first sentence of new regulatory language. We don't object to the area defined during the mid-August troll closure. The date should be June 15th or June 1st if the Board supports proposal #311 not August 1st.

Proposal #344: Support

SEAFA supports NSRAA submittal of this proposal to change the lines at Deep Inlet to allow additional access to the troll fleet on enhanced king salmon raised to benefit the troll fleet.

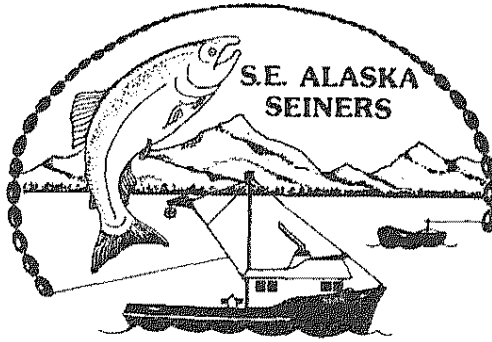
There are additional proposals that we may comment on during public testimony and the committee process after we have seen ADFG's staff comments and reports. We would also like to request a SEAFA representative to serve on all committees.

Thank you for your time serving on the Board of Fish and for considering our position on the various proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director



11 February 2012

Alaska Board of Fisheries
c/o ADFG, Boards Support Div.
PO Box 115826
Juneau, AK 99811

Re: Southeast Finfish Board of Fisheries Meeting

Dear Board of Fisheries Members:

The Southeast Alaska Seiners Association (SEAS), founded in Ketchikan in 1968, represents the entire purse seine fleet in Southeast Alaska and maintains a dues paying membership of 110-125 seiners plus an additional 45-60 local Southeast business members. SEAS would like to submit the following comments on a suite of proposals for the 2012 cycle.

There are 3 areas we'd like to focus on:

1. **USAG-SEAS agreement.** In early January, SEAS and USAG (United SE Gillnetters) submitted an agreement to not subject the Board to proposals that the two groups had submitted that were untoward each other group. SEAS would like to offer an apology to the department staff time and any other inconvenience our withdrawn proposals might have caused. SEAS is pleased that we could arrive at a detente' or compromise with USAG and feel strongly that these proposals were largely allocative in nature and that it should not necessary to spend valuable Board time in light of the agreement between two traditional Board of Fish enemies. The SEAS proposals and USAG proposals are as follows:

SUPPORT WITHDRAWAL of Proposals 289, 290, ,291, 295, 296, 297, 298, 323, 324, 332, 333, 336.

SEAS supports withdrawal of these proposals as part of the SEAS -USAG agreement. These are all SEAS or USAG proposals and both groups have withdrawn their support from all of the above proposals.

2. RPT Agreement and Proposals:

SEAS supports the RPT agreement going forth, with the proviso that the 6 year terms be reduced to 3 year terms for Deep Inlet and Anita Bay. SEAS also supports all other terms and references and proposals that the RPT references.

Support Proposals 334-335 with the proviso that the sunset is reduced to 3 years.

3. Other proposals Supported/ Opposed

Support Proposal 341- as is, to stay troll-seine only in the SE Cove SHA. Gunnuk needs to be contributing to the region and is attempting to do so through this proposal

Support Proposal 340 to clean up the problems created by early season contraction of the Anita Bay King Salmon harvest area. This should have been taken out of cycle last year, in our opinion. The time is ripe for correcting this disastrous early season line. The siting of a release site for kings without an opportunity to harvest them for a month or so after they've arrived is just plain poor management practice.

Support Proposal 342 to allow NSRAA to advance 21st century versions of cost recovery that will enable ADFG management flexibility on years of decent northend returns. SEAS believes that prices to fishermen will increase under a fishery without cost recovery.

Support Proposal 288 to allow seiners to have the extra gear on board for emergency rip ups or gear replacement. All other gear groups in Alaska, from Trawlers, gillnetters, longliners, crab pot fishermen, shrimpers and trollers are able to carry spare gear so that they don't lose fishing time. Seiners couldn't deploy both nets, unlike other gear types who are allowed to carry spare gear, but need to be treated fairly. Often a seiner is fishing in Chatham and his spare net is sitting in a warehouse in Ketchikan.

Oppose Proposals 285 and 286 which seek to extend the 58 foot length limit. SEAS has consistently polled on this issue and there is less support for a change than there was last cycle and considerably less support than there was a decade ago. 70% of our members oppose these proposals at this time. While SEAS is sympathetic to changes to increase our fleet's opportunity as evidenced by our support of Proposal 288, we cannot support a change that a supermajority of the fleet opposes.

Thank you for consideration of our comments

Sincerely


Dan Castle, President, SEAS

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

January 20, 2012

Board of Fisheries

February 24 – March 4, 2012

Dear Chairman Johnstone and Board of Fish Members:

The Southeast Herring Conservation Alliance (SHCA) submits these comments on proposals you will be considering at the upcoming meeting concerning fisheries in southeast Alaska. SHCA is a 501 (c)(6) not for profit and represents the interests of fishermen, processors, tender men, crew, and families associated with herring fisheries throughout southeast Alaska. SHCA members participate in the Sitka Sound herring sac roe fishery and other herring fisheries in Southeast. Forty-four sac roe permit holders of the 48 total permits are SHCA members. Membership is defined by dues paid by the permit holders. SHCA looks forward to working with the board this year on proposals pertaining to our fishery.

Re: Opposition to Proposals 230, 231, 232, 238, & 239; Support for 227, 245, & 273

Support 227 ADFG proposal – clarify equal share for 1-E and 1-F sac roe is for purse seine, NOT gill net equal share. This is a housekeeping proposal by ADF&G and SHCA supports department.

Oppose Proposal 230 – apply ecosystem management to Sitka Sound herring management

This proposal is far too vague to fully understand what it means and how it would be implemented. However, in an attempt to take it as face value, ADF&G (department) already conducts a thorough analysis of ecosystem parameters in their model to predict biomass. For example, mortality from whales, birds, and other piscivores are estimated in the model, part of ecosystem accounting. The department adjusts mortality based on annual testing of biomass estimates by model hind casting. Considering the biomass has steadily increased by a factor of twenty (7,500 tn to 150,000 tn) since the

department began managing herring in Sitka Sound in the mid-1960's, it is a testament to their management, their mathematical modeling, and the health of the ecosystem. One of the largest predators of herring is humpback whales and they have been increasing at a rate of 7% over the past decade according to research conducted by the University of Alaska, NMFS, *et.al.*

Furthermore, many biological parameters, or pieces of the ecosystem, are measured and accounted for in the department's annual surveys. Dive surveys collect information on spawn density, spawn substrate, spawn depth, and quality. Aerial surveys capture the extent of daily spawn, multiple spawn events, and spatial distribution. The department has developed a sophisticated assessment program and employ Ph.D. scientists that model and analyze these data, in order to carry out its State of Alaska mandate to manage the resource sustainably and to maximum benefit for the people of Alaska.

The 20% harvest rate at current biomass levels is demonstrably conservative and biologically defensible. This proposal has no merit and is simply proposed to harm a group, rather than solve a problem.

This proposal was voted down by Sitka ADF&G Advisory Committee meeting.

Oppose Proposal 231 – require ADF&G management to shutdown Sitka Sound herring fishery when GHF is within 10% of harvest quota.

If you look at ADF&G's historical data of the fishery, especially in the past decade, it is apparent there is no issue here. The quota is rarely surpassed; in the past decade it is 2% under the harvest quota. Management precision of $\pm 1\%$ is outstanding and difficult to expect better. ADF&G management utilizes sophisticated tools and highly trained personnel to prosecute the Sitka Sound sac roe fishery with precision, respect for subsistence needs, and careful data collection to maintain a healthy herring stock for future generations. In addition, looking deeper into the historical data, when the biomass for the harvest year is adjusted for total spawn deposition, the biomass has been underestimated in ten of the last 12 years and therefore the harvest quota could have been even higher based on the 20% harvest rate. Many fishermen say the department is too conservative and cite underestimating biomass as evidence.

This proposal is an attempt to lower the harvest quota arbitrarily and without merit. The precision attained by the department in hitting the mark is a testament to their professionalism, careful execution of scientific principles, and good management.

This proposal was voted down by Sitka ADF&G Advisory Committee meeting.

Oppose Proposal 232 – change harvest formula from $2 + 8(\text{spawning biomass in tons}/25,000)$ to $8 + 2(\text{spawning biomass in tons}/25,000)$.

There is no justification for changing the harvest formula. The formula is consistent with large biomasses of herring elsewhere in Alaska and coastal Canada from the Strait of Georgia to Prince Rupert,

where herring is also increasing in biomass. Populations of herring with lower total biomass are managed with the “8+2” formula in Alaska for good reason; they are small populations, perhaps less resilient, and require a more conservative management regime. One size does not fit all, and should not. The “2+8” formula used by ADF&G in Sitka Sound is actually conservative for the large population size. In ten of the past eleven years the “2+8” formula resulted in a 20% harvest rate and yet during that same period of time the population has grown from an estimated 52,985 ton biomass to 145,042 tons, a nearly threefold increase.

The conservation and protection built into the formula is in the harvest threshold side of the equation. Currently no harvest can occur in the Sitka Sound sac roe fishery until the biomass reaches 25,000 tons (adopted by Board of Fish in 2009); as the biomass rises above 25,000 tons the formula provides for a harvest rate that begins at 10% and rises to a 20% harvest rate maximum. Most herring stocks in southeast Alaska are considerably smaller than the minimum threshold of the Sitka Sound stock. The minimum threshold enabling a fishery has increased for the Sitka stock from 6,000 tons in 1977 to 7,500 tons in 1983 and then was raised to 20,000 in 1997 as the biomass continued to increase. This was viewed as a conservation action even though there was not a biological need or a recommendation made by ADF&G. By way of compromise to minimize loss of commercial harvest, the board adopted the “2+8” formula at the 1997 meeting. In 2009 the Board of Fish again increased the minimum threshold to 25,000 tons for added conservation at lower stock levels, though there was no conservation need demonstrated or supported by ADF&G. This was done at a time when the herring expanded to nearly 90,000 tons in stock biomass. The 2012 projected biomass is estimated at 149,000 tons.

There is no biological basis for changing the formula. ADF&G has been meticulous in seeking outside consultants and experts to review its ASA model, including UA professor Ted Cooney and a recent P.hD candidate at UW. In fact, in 2011 Canada’s Department of Fisheries and Oceans invited ADF&G to participate in a two day workshop with DFO modelers and biologists to meet with modeling experts from the University of Washington (Dr. Andre Punt) and University of British Columbia (Dr. Steve Martell) in Nanaimo, B.C. (per. comm. Dr. Sherri Dressel). The scope of the workshop included model functions, inputs, outputs, mortality factors, precautionary approach, and many esoteric modeling factors. The Canadian herring model was reviewed and frequent questions were asked of the Alaska team to bore into model criteria. Based on this review it is apparent the department is doing its due diligence to keep abreast of the latest modeling recommendations and science. (No publicly available document produced by ADF&G)

If the “8+2” formula were implemented on a 100,000 total biomass the harvest quota would be 16% or 16,000 tons rather than 20% or 20,000 tons with the current formula, a significant reduction without any benefit. The proposer states that management would benefit, however ADF&G as the manager of the Sitka Sound herring disagrees. Having one common formula does not make management easier; it simply makes management inefficient and un-reactive to actual conditions in the local area, a hallmark of Alaska fisheries resource management.

This proposal seeks to harm the fishery, which in turn would harm anyone associated with the fishery – the communities of Sitka, Petersburg, and Ketickan; crew, tender men, processors and associated service providers. In fact it would hurt STA members as many are fishermen and crew (6%). In

a survey conducted in 2009 it was found 74% of the permit holders were Alaskan, 18% permit holders were Alaska Native, and 29% Alaska Native when including spouse, family & permit holder.

This proposal was voted down at Sitka ADF&G Advisory Committee meeting.

Oppose Proposals 238 & 239 – Establish subsistence only harvest in Core Area –Makhnati to Gavanski to Crow Is. to Halibut Pt., along roadside to breakwater.

The proposer's contention is twofold: 1) sac roe harvests near or in the core area negatively affect subsistence egg on hemlock branch harvest, and 2) removing the core area from the fishery management unit will assure ANS. Both contentions lack supporting evidence and are contrary to conclusions in the Subsistence Division 2002-2010 Report No. 343 (Holen D., et.al. 2011), which in part states a significant reason being "participation in the subsistence harvest has declined in recent years". In 1985 Gelmech and Gelmech published a report stating that herring egg subsistence in Sitka Sound is practiced by a small proportion of the community. Twenty-five years later as stated in the Subsistence Division Report No. 343, that small number of harvesters has declined further. Five well known "high harvesters", who were fishermen (sac roe & salmon) and harvested herring eggs for Sitka and outlying communities have either retired or died. The reports' graph and table on page 24 and 25, respectively, tell the story of the decline in participation. The report also speaks to the desire to receive herring eggs which has remained nearly constant.

The real question, then, is whether closure of the core area or any part of the core area is necessary to provide a "reasonable opportunity" for subsistence, as defined in AS 16.05.258(f). That term is defined as "...allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant a reasonable expectation of success..." Reasonable opportunity is available every year. Based on ADG&G survey transects heavy spawn densities have been documented at locations along the road side and/or within several miles of the Sitka road system in all years of the past decade (see attached maps). According to the Subsistence Report No. 343 the ANS guideline has been met six of the nine years documented in the report. In 2005, 2007, & 2008 when the lower ANS guideline was not reached it was not due to lack of reasonable opportunity, but rather reduced effort & participation, weather, and/or fuel costs, not to mention the reported numbers are not transparent. Spawn distribution does have a role in success, as the herring do not spawn with the same intensity at all given locations every year. Additionally, Report No. 343 calls into question their reported numbers by acknowledging the methodology was changed in 2010. The report does not discuss what the overhaul in methodology means to previous subsistence harvest estimates. The change certainly begs validation of, or qualification of previous results. In the conclusions the report speaks to container weight calibration in 2010 which is certainly a reaction to SHCA's 2009 efforts at determination of actual weights as measured by a State of Alaska certified scale. Much additional work needs to be done to develop a scientifically defensible and transparent methodology. (See comment on proposal 273)

SHCA's work in 2009 and 2010 demonstrates there is reasonable opportunity for subsistence harvest of herring in Sitka Sound. Determining the total weight of herring eggs (actual measured weights) required to meet needs is a different question, but based on our work it appears to be closer to 50,000 lbs

for Sitka (see attached Herring Eggs on Branches Program 2009). Importantly, Subsistence Division reported at the ADF&G Sitka AC meeting that the 2011 herring egg harvest was between 50,000 and 60,000 lbs. The board may need to revisit its ANS finding for herring in Sitka Sound at a future meeting.

In the past decade, the department has made a serious effort to stay out of the core area when possible; it has not always been possible. However, the vast majority of openings have been conducted outside the core area based on ADF&G reporting. From 2002 to 2010, approximately 80% of the sac roe harvest has been taken outside the 'Core Area'. Regardless, the core area has had abundant spawn in all years. It is the one constant. In some years herring spawn in the Redoubt area or Deep Inlet but other years they do not; however, ADF&G spawn maps show consistent spawn in the core area year after year. Certainly there is variability in the spawn density but Kasiana, Middle, Crow, and a portion of the roadside consistently have annual spawn.

Proposals 238 and 239 are intended to diminish the fishery and the harvest, likewise for proposal 232. The proposers claim that subsistence needs cannot be met with the current sac roe fishery management plan. This is patently untrue and there is good evidence to demonstrate otherwise. In 2008, 2009, and 2010 the herring fishermen, processors, tender men, and community members got behind a program to help meet this need. Please see separate report submitted by SHCA regarding the herring egg on hemlock branch program. Steve Demmert, captain and owner of the F/V Julia Kae, spearheaded the effort to harvest eggs and deliver them to the dock in Sitka the first year, as well as Sitka and outlying communities in 2009 & 2010. Prior to 2008 Mr. Demmert's vessel was named Alice H, and the skipper had a long tradition of harvesting and providing herring eggs to community members in Sitka. Upon the skipper's untimely death in 2007, Steve agreed to continue the tradition using the same vessel.

If subsistence harvest information is used to curtail a fishery then that information needs to be transparent and verifiable, similar to commercial harvest data. There is no information to support that subsistence opportunity has been diminished in recent years. To the contrary, given increasing stock abundance and review of ADF&G spawn maps depicting spawn distribution, one can only conclude that subsistence opportunity is now greater than it has been since the department began managing the resource.

The ability and desire to get out and collect the eggs may have declined for a variety of reasons, but there are groups and individuals ready to help with meeting that need. SHCA has demonstrated there is reasonable opportunity, and has been there to help meet a need that the communities of Sitka, Hoonah, Angoon, Kake, Wrangell, Ketchikan, and Klawock demonstrated with great enthusiasm and appreciation when the Julia Kae pulled up to their docks.

These proposals were voted down at Sitka ADF&G Advisory Committee meeting. Proposal 238, originally crafted at a poorly attended March 2011 AC meeting held during the sac roe fishery was ultimately voted down at the December 6, 2011 AC meeting.

Oppose Proposal 242 – Increase biomass threshold for initiation of a fishery from 6,000 tons to 15,000 tons.

There is no biological justification for raising the threshold. By this logic the proposer would simply raise the threshold as biomass increases with the result of no fishery, ever.

Oppose Proposal 243 & Proposal 244 – Eliminate purse seine fishery in 1-E and 1-F West Behm Canal.

These proposals are simply a grab for allocating the total resource to one net group over another based on circumstances unrelated to the herring fishery. There is no biological justification for this proposal.

Support 245 Southeast Herring Conservation Alliance – Proposal to allow 1-E and 1-F fishery equal shares to be stacked on other boats with sac roe permit.

The sac roe fishery in southeast Alaska sections 1-E and 1-F have a minimum threshold biomass of 6,000 tons; the 2011 GHF was 1,276 tons for Behm Canal. 5 AAC 27.197 (a) (2) allows for an equal share harvest. It is impractical and terribly inefficient for 48 seine permit holders to each harvest 26 tons (half a boat load for most boats). This proposal requests that permit holders may allocate their share to a specific permit holder/harvest boat. If the regulation is not modified the fishery becomes uneconomical at low population biomasses.

Support Proposal 273 – Establish an accounting system for herring egg harvest in Sitka Sound through permit or sampling program.

The fundamental reason for this proposal is the ANS range (136,000 to 227,000 lbs) for herring eggs in Sitka Sound is not based on scientifically defensible data or data that is transparent. More to the point, the ANS guideline is being used by some, to claim the sac roe fishery is the reason ANS cannot be met. Based on SHCA's work in 2008 – 2010 collecting and delivering eggs in Sitka, this is simply not true. Our work outlined in the attached reports show needs can be and were met, and as important, reasonable opportunity is extant. In order to truly document the harvest of herring eggs and what quantity (by weight) meets those needs, a new methodology is required with greater scientific and statistical rigor than the current household survey methodology. SHCA understands that subsistence harvest throughout most of the State of Alaska does not require a permit or have "creel type censuses" to document harvest. However, Sitka Sound herring eggs and the sac roe fishery is a unique situation and demands a unique solution.

A study design that provides scientifically defensible data could be relatively simple. The herring egg harvest including tree preparation is done in a short period of two weeks in late March or early April. The eggs are primarily brought across one of six docks in Sitka – Starrigavan, Eliason, Thompson, ANB, Crescent, and Sealing Cove harbors. Based on

experience in 2009 and 2010 the majority of herring eggs come across the Eliason dock due to its drivable ramp and work float but also the dock's central location in Sitka, as well as proximity to the core herring spawn areas to the north (i.e., Kasiana, Middle Islands).

In order to estimate harvest quantity, Subsistence Division samplers could observe/sample the docks for harvesters shortly after the first major spawn event. Harvesters could provide information to samplers or, less invasively, samplers could estimate weight of harvest, number of harvesters, and size of containers used to transport the harvest, and frequency. All docks should be surveyed although proportional sampling could be done much as the king salmon creel survey methodology. The majority of eggs cross the docks in a seven day period, and therefore the duration of the survey can be short.

Estimating effort could consist of two elements: 1) interviewing harvester as they transit the docks as outlined above and 2) observations on the core subsistence areas for number of branch sets, size of branch sets, number of harvesters making sets, and size of harvest vessels. Success rate should be estimated by combining effort with harvest amounts, lost or stolen branch sets, and weight of eggs per set.

SHCA is willing to aid in this effort as it did in 2009 and 2010 when we turned in detailed reports to Subsistence Division. SHCA, Sitka Tribe of Alaska, and Subsistence Division working together could provide scientifically defensible data with which to make management decisions. The dozens of community members that came to receive eggs from the Julia Kae are a resounding demonstration of that sentiment.

SHCA members and associate members will be at the Ketchikan meeting; we would welcome the opportunity to talk with board members about the fishery, these proposals and to answer any questions. We would also like to serve on the board committee formed to address these proposals.

Thank you for your time and commitment to the board process and the opportunity to comment.

Sincerely,



Steve Reifentuhl
Executive Director SHCA

REFERENCES & LITERATURE CITED

Funk, F. 1991. Harvest policy implications of yield per recruit models for Pacific herring in Alaska. P. 453-462 in: Proceedings of the International Herring Symposium, Alaska Sea Grant Report AK-SG-91-01, Fairbanks, Alaska.

Holen, D., Stariwat, J., Lemons, T., Ciccone, V., and Turek, M. 2011. The Subsistence Harvest of Herring Spawn in Sitka, Alaska 2002-2010. Technical Paper No. 343.

Woodby, D. D. Carlile, S. Siddeek, F. Funk, J.H. Clark, and L. Hulbert. 2005. Commercial Fisheries of Alaska. Alaska Department of Fish and Game, Special Publication No. 05-09, Anchorage.

Alaska Department of Fish and Game. 2012. Spawn Density Maps Juxtaposition with Sac Roe Openings 2002 – 2011.

Sac Roe Fishery Participation Survey 2009. Theresa Allen Olson and Southeast Herring Conservation Alliance.

Summary

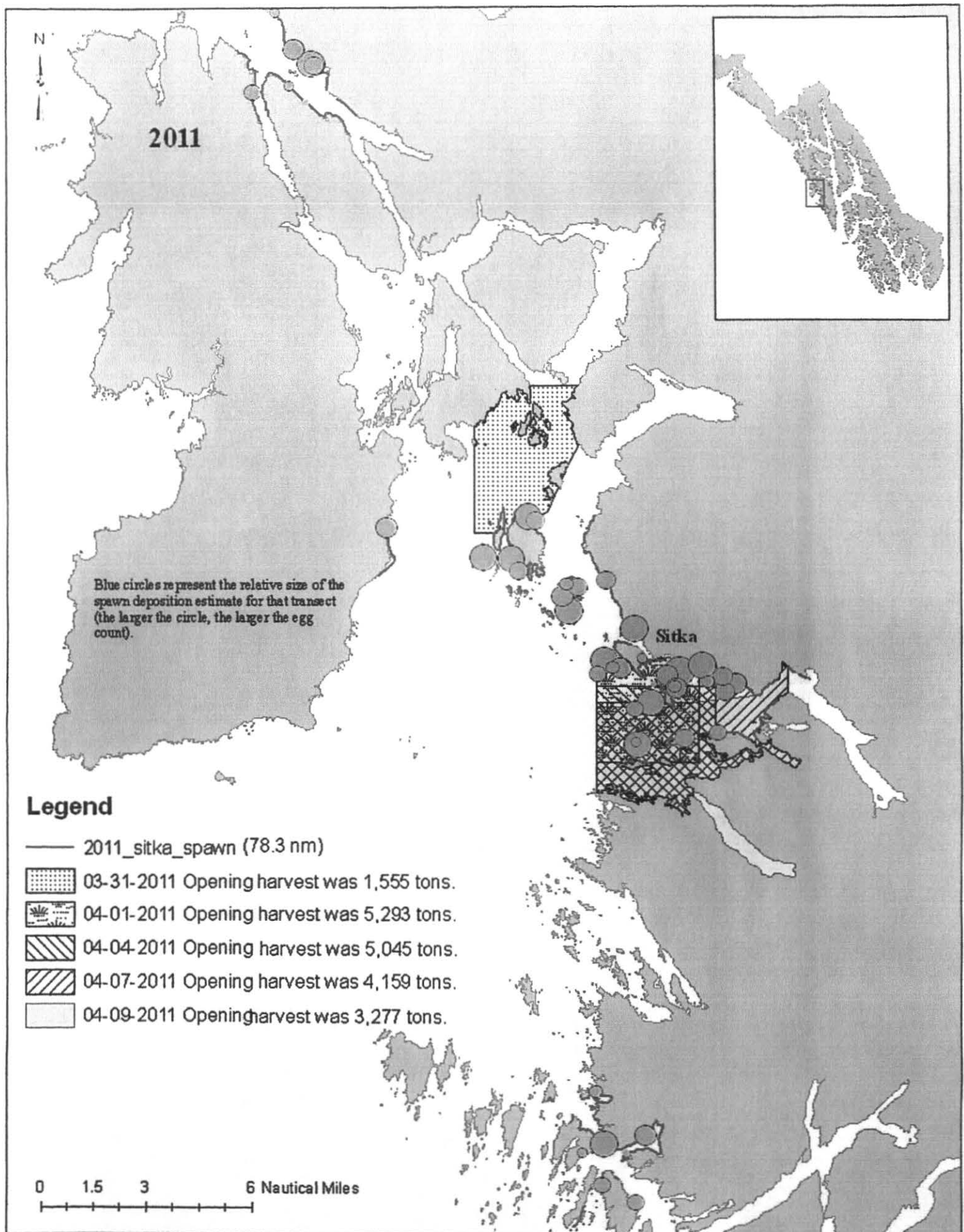
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FISHING VESSELS	270	192	78	7	66	17	22	77	50	9
TENDER VESSELS	143	113	30	9	28	1	5	19		
PILOTS AND CREW	28	17	11	1	2	0	0	0		
CORKING SKIFFS	74	59	15	15	23	3	7	28		
TOTAL	515	381	134	32	119	21	34	124		
	PERCENT	74.0%	26.0%	6.2%	23.1%	4.1%	6.6%	24.1%		18.0%

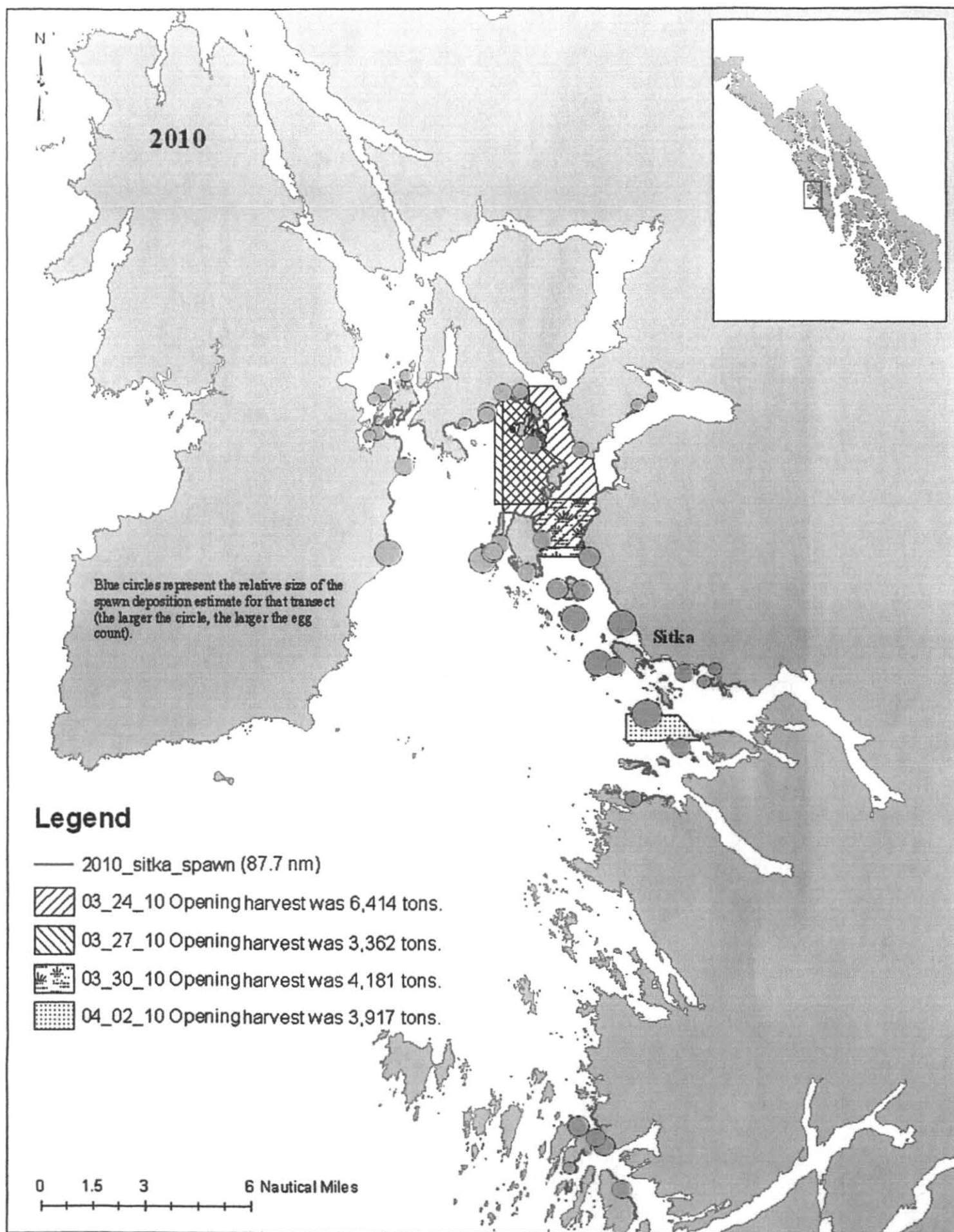
NUMBERS ARE BASED ON ACTUAL CONTACTS

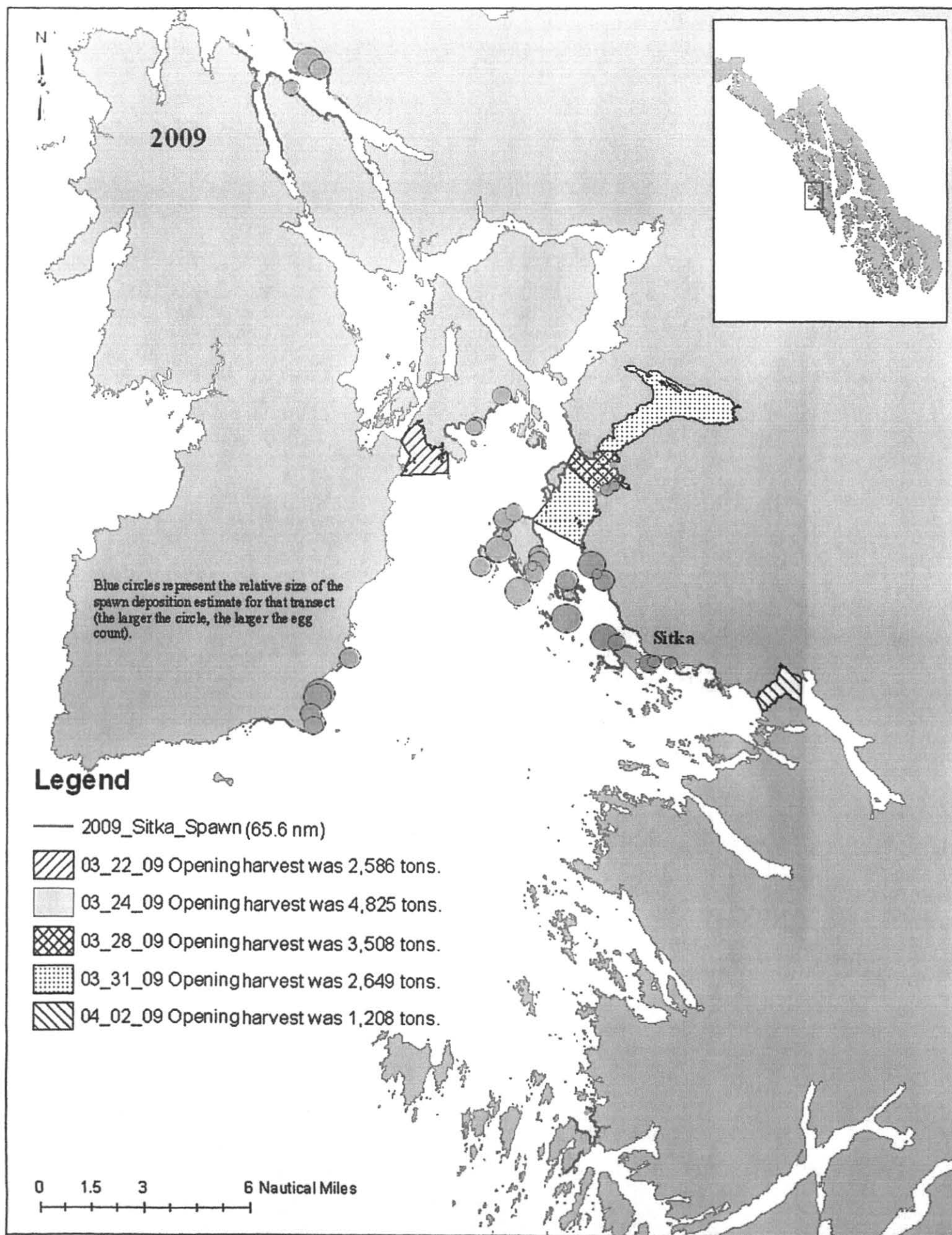
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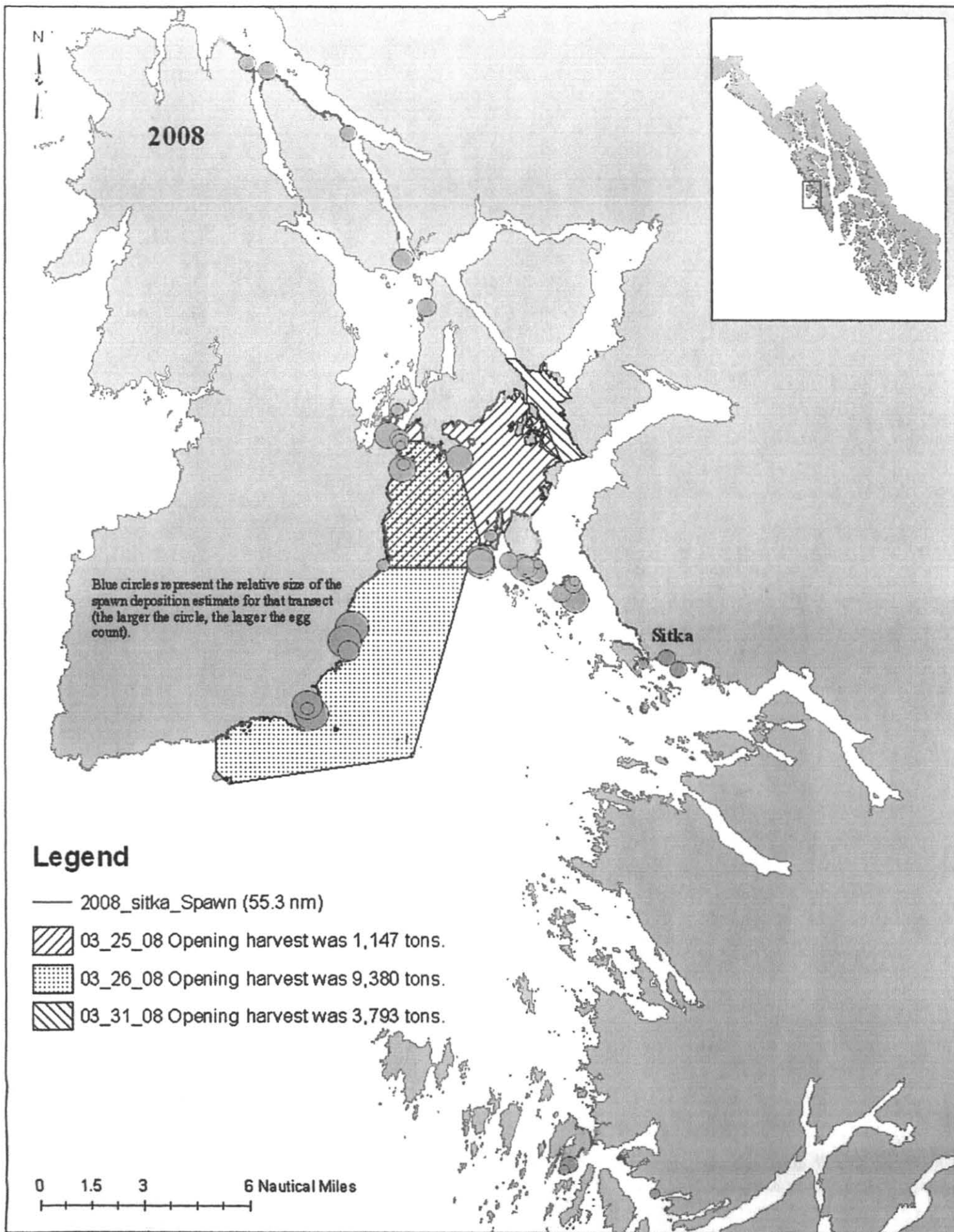
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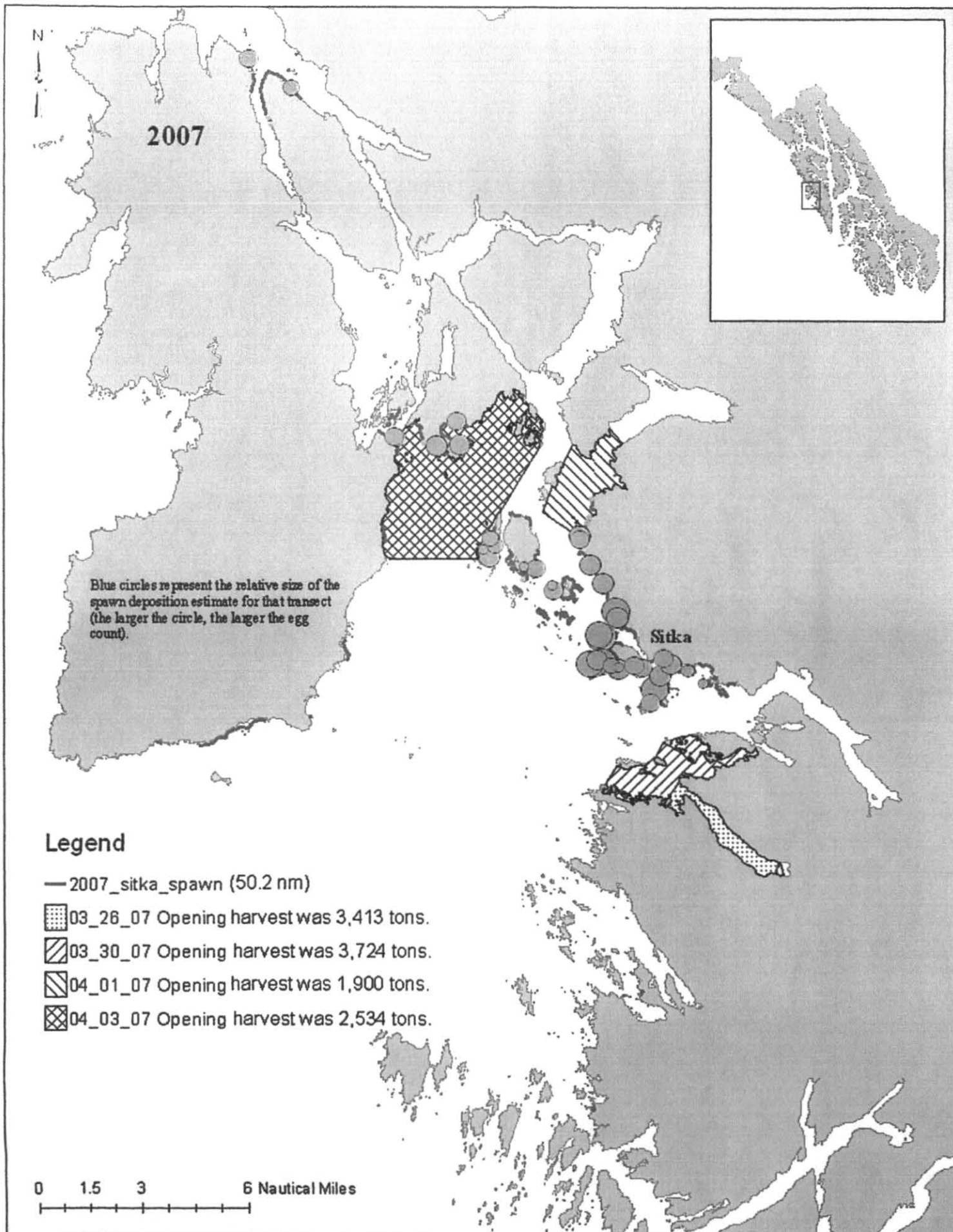
11 OR MORE CORKING SKIFFS ARE NOT AVAILABLE

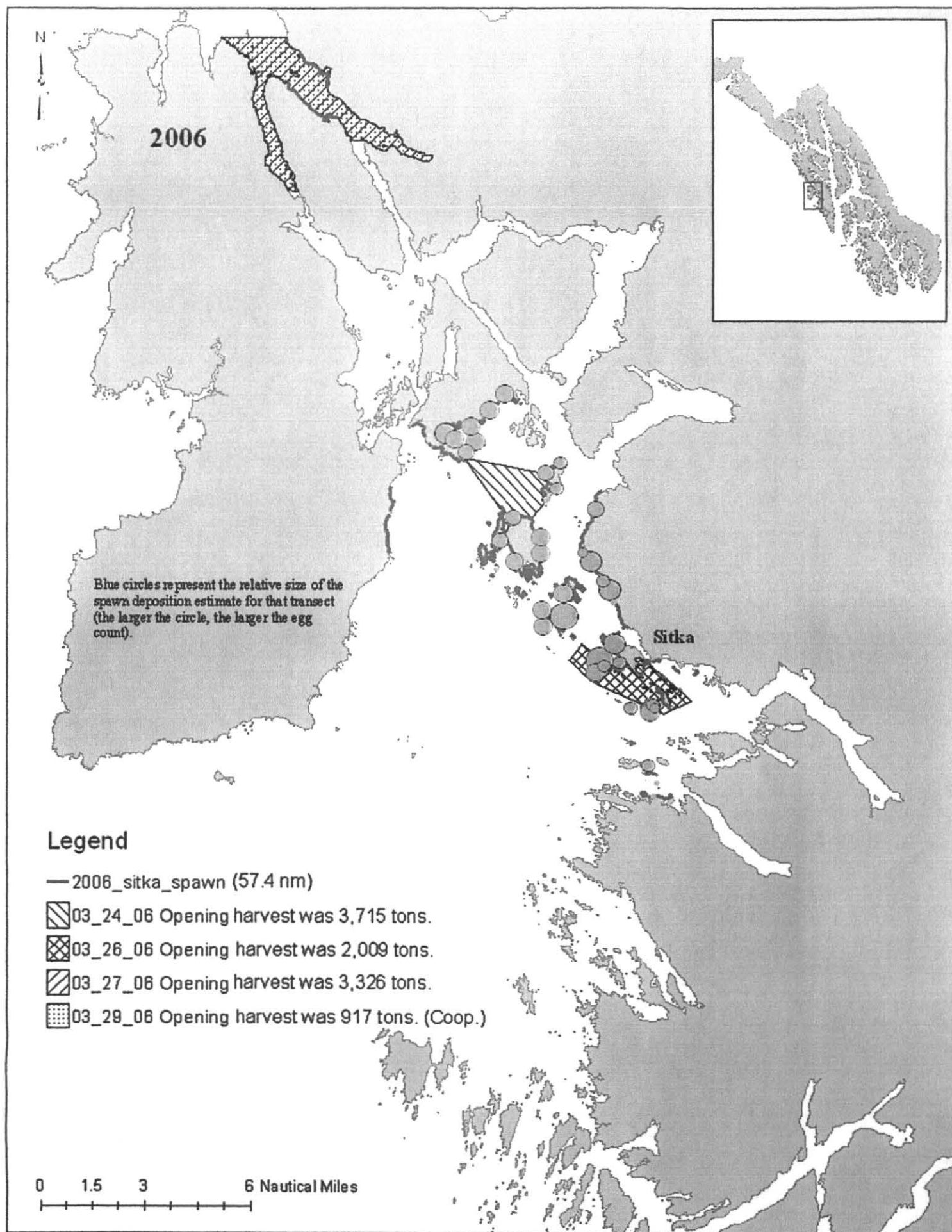


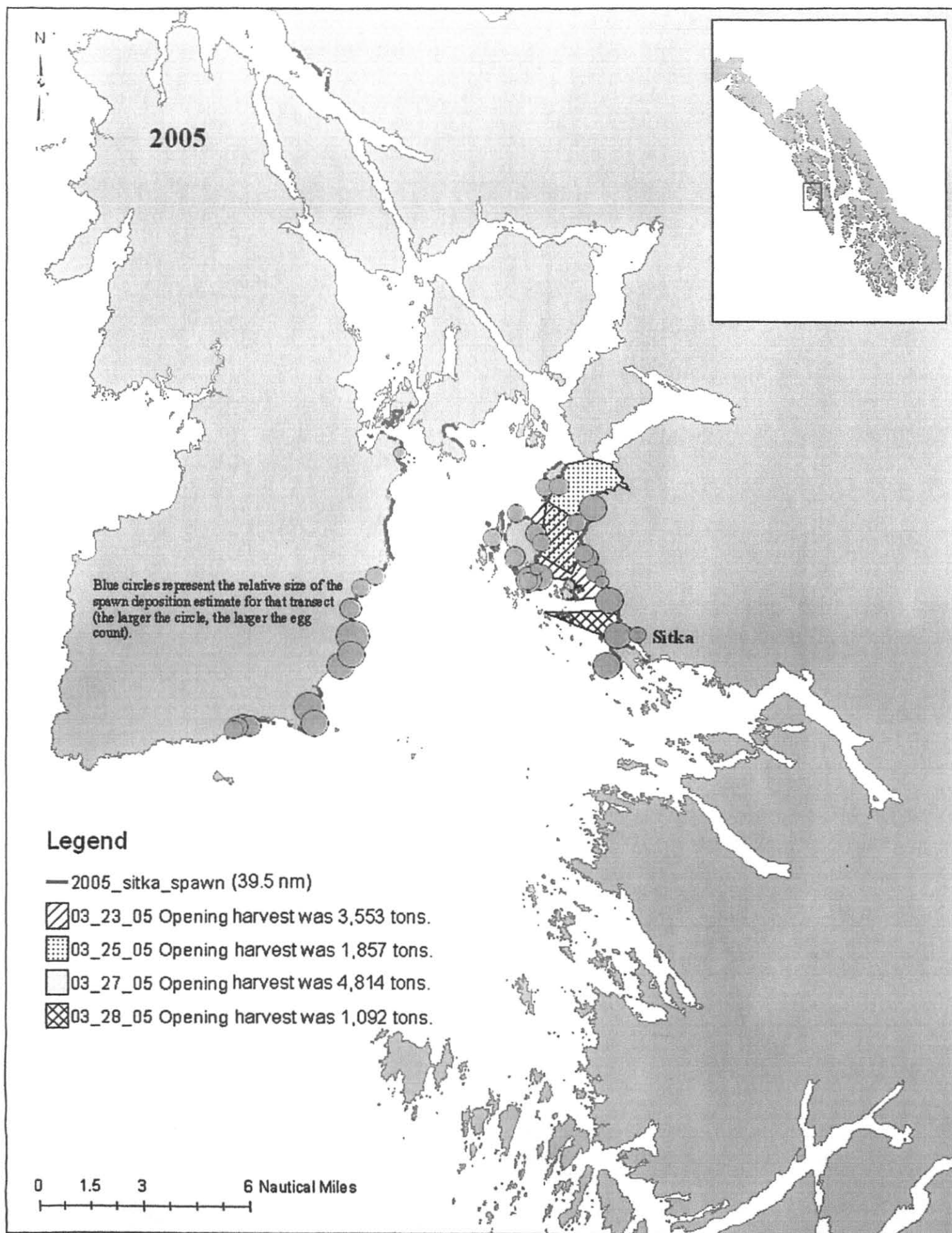


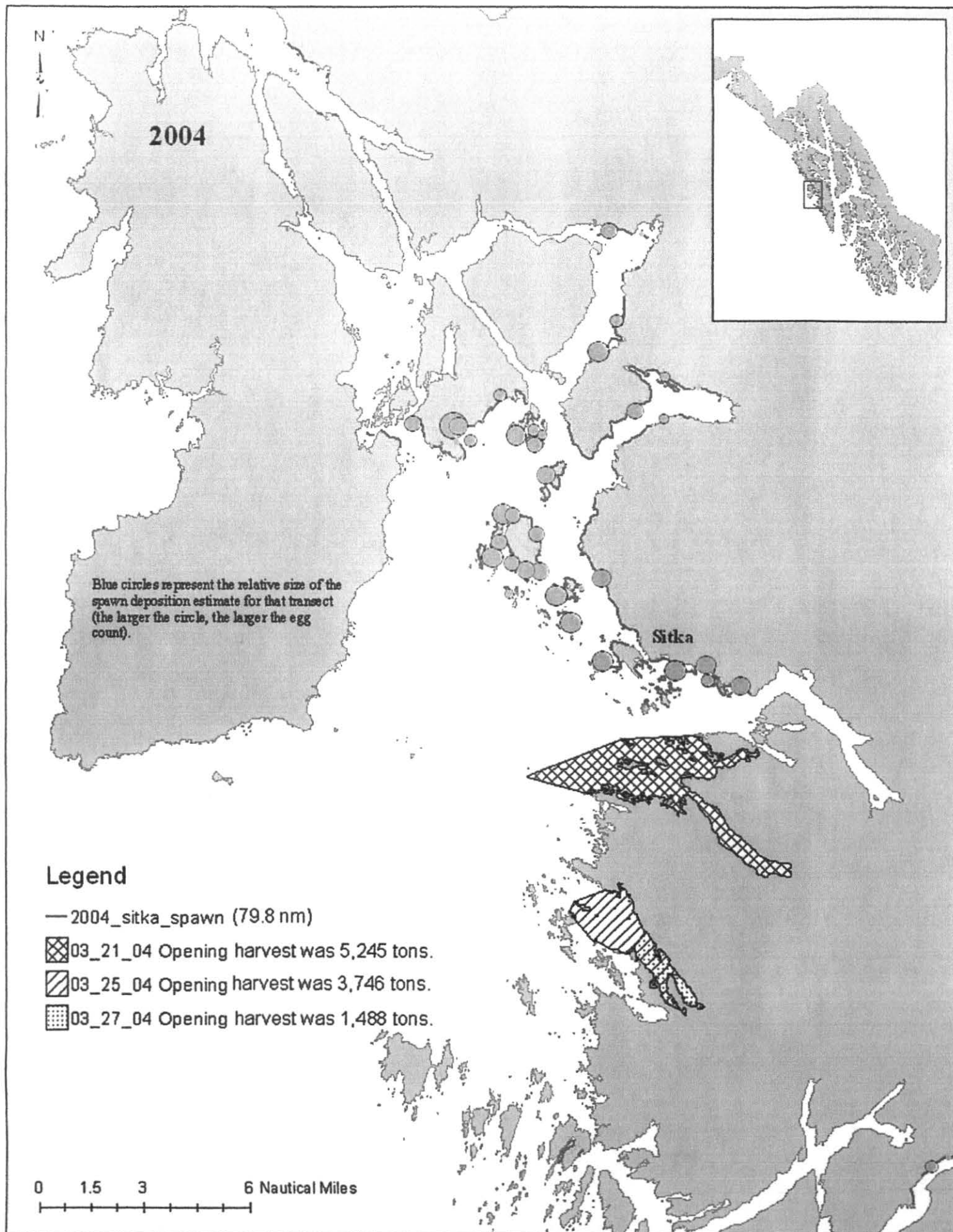


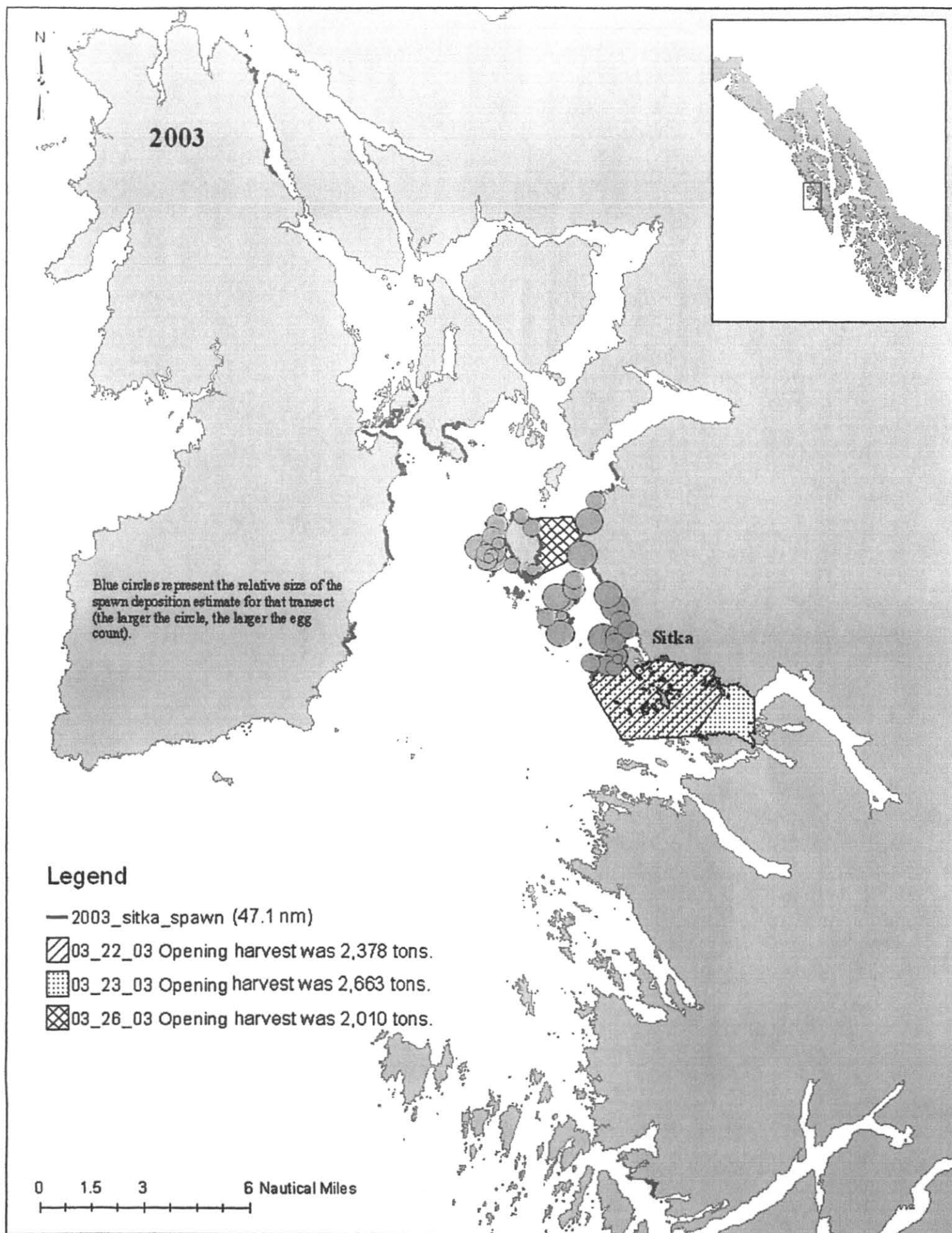


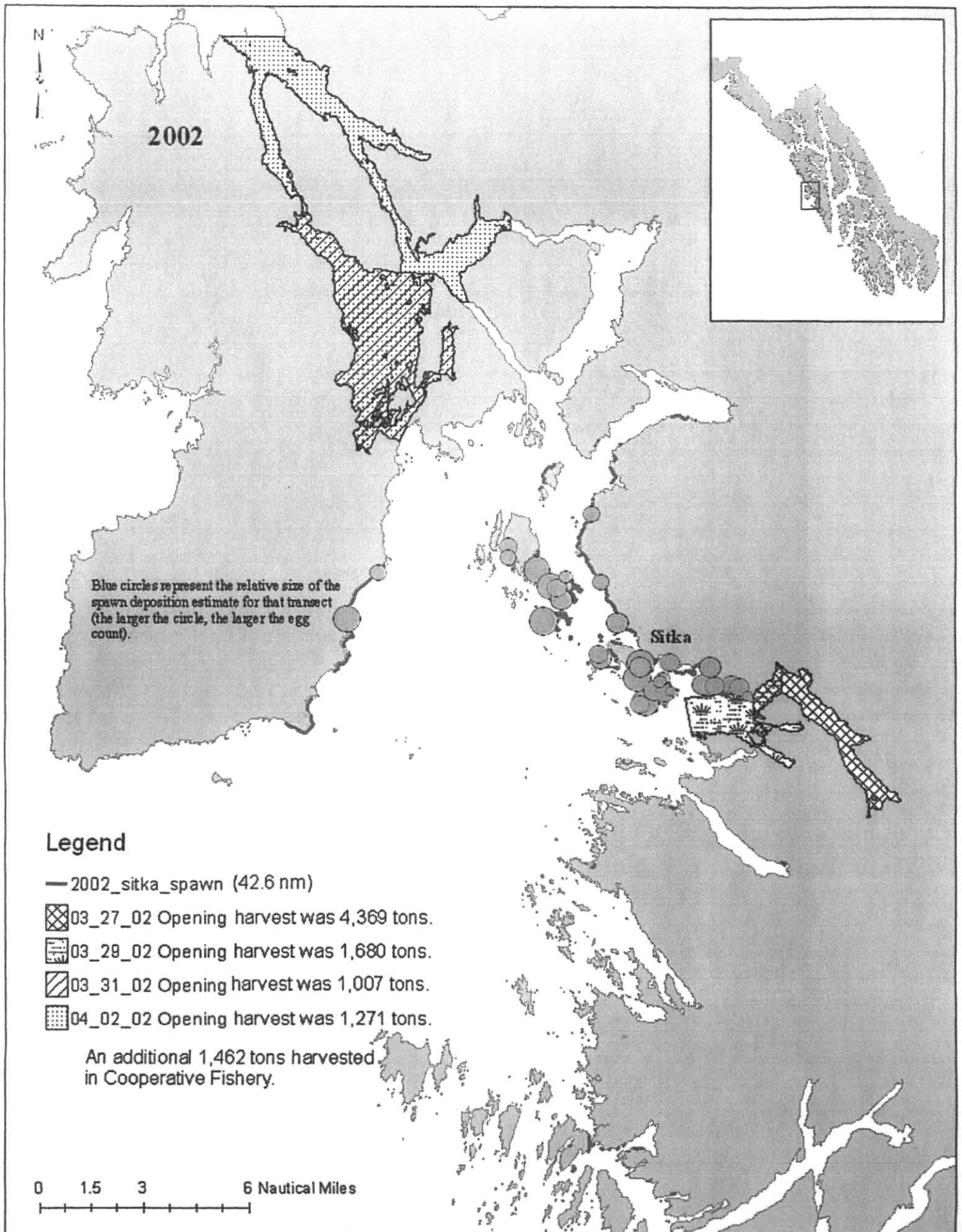












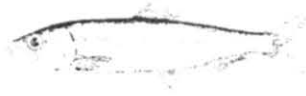
SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

Herring Egg Branch Program 2009

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O.Box 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

Herring Eggs on Branches 2009 Program

Goal of Program: 100,000 lbs of eggs on branches, trimmed weight without bole of tree and help meet herring eggs subsistence needs in Sitka.

2009 Board of Fish adopted ANS: 136,000 to 227,000 lbs herring eggs on branches

Overview:

Steve Demmert, F/V Julia Kae was contracted to harvest 100,000 lbs of eggs on branches subsequent to the prosecution of the sac roe herring fishery. Steve Demmert had a crew of four counting himself for the cutting, gathering, placement, and retrieval of hemlock trees. Walt Samuelson, a local resident who grew up in Sitka and had a life time of experience harvesting herring eggs was one of the crew members. Mr. Samuelson formerly crewed with Sonny Enloe, F/V Alice H (now F/V Julia Kae) until Sonny's untimely death in 2007. The three person crew and skipper also helped with distribution of the eggs at Eliason Harbor.



Photograph of beach along Sitka road system on April 9, 2009 showing heavy herring spawn which ultimately occurred from Sitka Channel to Starrigavan.



Spawn was heavy in the core area from April 8 to April 11 with multiple spawning events around Middle Island, Kasiana Is, and Crow Is. Branch sets by Julia Kae and Traci C occurred primarily in this area from Hayward/Guide Island to Whiting Harbor.

The Traci C, skipper Charles Backus, also a Sitka resident and STA member with years of herring egg harvest experience, was also part of the harvest effort on April 3 after the sac roe fishery was completed. It became apparent that we could not set sufficient branches to reach 100,000 lbs without the aid of another large boat. Charles and crew cut trees and made branch sets for herring eggs through April 11.

Methodology and Program:

Just prior to the last sac roe opening on March 28, 2009 trees were cut up to 6" diameter for herring egg sets. The rear deck of the Julia Kae (58' seiner) was loaded with some 54 trees which were set at locations in Hayward Strait, Middle Island and Kasiana Islands (see maps). Sets were also marked on a GPS plotter. Sets were anchored with rocks and marked with a buoy.

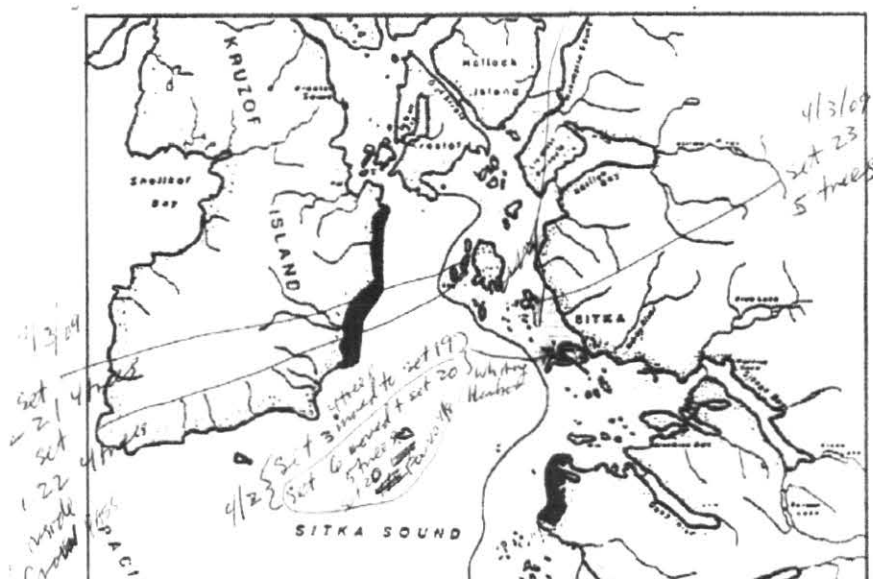


Figure 1. Typical location map of sets made by F/V Julia Kae. Date & time of set, number of trees in set and retrieval times were recorded on map and data sheet. A data sheet was used to record weights & comments.

Mr. Demmert recorded set locations on maps, and also recorded set dates, times, and number of trees per set on data sheets. Sets soaked for a week to ten days until the herring spawned (see appendix). Ultimately, over 80 trees were set although some were lost to poor placement and storm surge; some sets were lost to theft.

The last sac roe fishery opening was April 1, 2009; no spawn was observed by ADF&G by this date. Sea surface temperatures reported on the NOAA website were 4 to 4.5°C

for the period of April 1 – 6, 2009. On April 7 the sea surface temperatures hit 5⁰C degrees and the herring began spawning in a geometric progression for the three days thereafter; the initial spawn was 3 nautical miles, followed the next day by 10 nm, and then over 30 nm on the third day. On the fourth day spawn continued but at a reduced rate. On April 10 a record 39 miles (for one day) of active spawn was observed by ADF&G. During the spawn period additional trees were set and some sets were pulled from low or no spawn locations and moved to areas expected to receive greater spawn.

During this period a second boat, the Traci C, was lined up to cut and set trees/branches. Charles Backus, skipper of Traci C made sets on April 6, 7, and 8. Heavy spawn occurred on the 8th and 9th in most of the areas where the hemlock branches were set. Branches were checked daily for eggs.



Figure 2. Herring eggs on branches were trimmed and placed into a Trayco tote. Branches were heaped onto the tote to obtain weights from a State of Alaska certified Ocean King scale and then recorded on a data sheet.



Figure 3. Scale weight for a loaded Trayco. Six hundred pound tote weights were loaded at approximately 1.5 to 2.0 times the tote volume (i.e. eggs and branches stacked high above the rim of the tote).

Eggs and branches were collected beginning on April 9. Sets generally consisted of several trees. Individual trees were hoisted from the water along side of the boat;

branches were cut from the tree and placed on deck prior to continuing to the Eliason Harbor dock. Branches with eggs were weighed on the harvest boat (figures 2 & 3). The Julia Kae tied up at the work float at Eliason Harbor beginning on the April 9. Local radio AM program Problem Corner was called at 11 a.m. each day, and local FM Raven Radio was notified; PSAs were broadcast from April 9 to April 13th. Newspaper stories also appeared in the Sitka Sentinel.

Results

Actual harvested herring egg on branch weights were determined by cutting all branches less than ½" from the tree bole prior to weighing. Branches smaller than ½" were then placed in a Trayco tote and weighed. Weights were recorded and then eggs on branches were placed on a tarp on the rear deck of the boat. Daily loads were kept to approximately 3,500 lbs. Eggs and branches were kept moist with seawater and covered unless the harvest boat was tied to the dock for community members' convenience. Community members could come aboard to select their herring eggs or the crew would place eggs in bags or boxes for individuals that did not want to climb over the gunwale.

The F/V Julia Kae harvested 13,000 lbs of herring eggs on branches trimmed to a diameter of ½" or less and delivered to Eliason Harbor where they were provided to anyone who showed up. The F/V Traci C harvested 17,000 lbs of herring eggs in the same manner and delivered them to Eliason Harbor. The total herring eggs provided through a five-day period in Sitka in April 2009 was 30,000 lbs weighed in totes using a calibrated and State of Alaska certified scale.

Additionally the Julia Kae collected 13,000 lbs of herring eggs which were transported to the communities of Hoonah, Angoon, and Kake. Approximately 4,000 lbs were provided at each community.



Figure 4. Steve Demmert on the stern of the F/V Julia Kae with 3,500 lbs of herring eggs on branches. Note no large trees or boles. The weights were taken subsequent to the large portions of the tree begin cut away. Eggs were rinsed with seawater every two hours.

The grand total of eggs harvested in Sitka Sound between the two harvest boats was 43,000 lbs in 2009.

On April 9 the Julia Kae arrived at Eliason Harbor and some 4,000 lbs of herring eggs were provided at the dock to approximately 100 people by the evening of the first day. The Julia Kae delivered herring eggs for four days prior to departing for Hoonah. The F/V Traci C also provided herring eggs at Eliason Harbor with temporal overlap with the Julia Kae until April 12. Demand for herring eggs fell off on April 13th and the effort was discontinued at 9 pm that day. All remaining eggs not claimed were returned to the ocean and not counted in the total weight provided to community members.

The crew of the Traci C counted 150 people receiving herring eggs in one day and estimated the total number of people receiving eggs from the Traci C at 300. The F/V Julia Kae had a half day count of 100 people but did not count all people in subsequent days. Therefore, the total number of person visits receiving herring eggs in Sitka at Eliason Harbor was estimated to be in excess of 400. Numerous people visited more than once and therefore the total number of discrete community members receiving eggs is unknown.



Figure 5. Steve Demmert helps box up 400 lbs of herring eggs on branches for Ketchikan Indian Association. Numerous groups or individuals came by to get herring eggs for community members or other communities such as Ketchikan and Craig.

Figure 6. Julia Kae at Eliason Harbor, Sitka, Alaska April 8, 2009. Skipper Steve Demmert delivered herring to local residents for four days. Some 13,000 lbs of eggs on branches were given away.



Figure 7 & 8. Prime herring eggs on branches. Eggs were often called gold and near perfection in 2009. Eggs were as thick as 1" on the branches



Discussion – herring eggs on branches

As noted the goal was to harvest 100,000 pounds of herring eggs on branches. It became apparent during the weighing of the branches that the 100,000 pound goal was not likely to be attained. Initially it was believed that it would simply take more effort. However, a crew member Mr. Samuelson grew up in Sitka and harvested branches on this same boat as the F/V Alice H (Sonny Enloe skipper), and unexpectedly provided the likely answer. Mr. Samuelson estimated a set hoisted up on the hydraulic block to weigh 10,000 pounds which actually weighed 1,500 pounds when all branches and eggs were trimmed from the tree bole. Additional estimates by the crew demonstrated a similar result of overestimation of actual weight by a factor of 3 to 6 times. As the crew's experience grew with measured weights, the estimates naturally became more accurate. We call this phenomenon "actual weight versus the perceived weight".

The discrepancy between actual and perceived weights was a complete surprise to everyone involved. Due to the unexpected revelation, further investigation of actual and perceived weights was conducted in a non-scientific manner at the dock with other harvesters. In one case a 1/2 ton pickup was loaded with what one non-Julia Kae crew estimated to be 4,000 pounds. On another occasion an experienced harvester was asked what he thought he harvested (200 lbs.) which seemed quite reasonable based on our experience of actual weights. Additional work needs to be conducted in this area.

Given what we determined to be an overestimate of weights by a factor of 3 to 6 in most cases our actual harvest weight of 43,000 lbs represents a perceived weight of 129,000 lbs (factor of 3) to 258,000 lbs (factor of 6) of herring eggs on branches. Results were consistent when conducted on the second harvest boat, F/V Traci C. As with two of the crew on the Julia Kae, the Traci C crew and skipper, Charles Backus, grew up in Sitka, are STA members and have been harvesting herring eggs since childhood.

Observing Sitka community members, young and old, gather up herring eggs into boxes and bags with such pleasure was a rewarding experience for everyone. Community members shared memories with some of the crew members from Sitka they hadn't seen in months or years, traded stories, marveled over the thick gold treasure, and connected on a level not common in large cities but not unusual in Sitka.

Herring Egg on Branches for Hoonah, Angoon, and Kake – 2009

The Julia Kae departed Sitka on April 11 and arrived in Hoonah on April 12.

Steve Demmert, skipper F/V Julia Kae has at least one relative in each community where he distributed herring eggs. Each community was contacted at least a day prior to arrival so community members would be ready with containers to receive the herring eggs. Mr. Demmert received warm welcomes at each stop and described the experience as nearly overwhelming. In Hoonah over a hundred people (close to half the community) lined the dock at the time of his Sunday arrival. The deck was emptied of 4,000 lbs of herring eggs in short order, without so much as a raised voice or gentle shove. Politeness, grace, smiles, and gratitude permeated the day.

Conclusions

Steve Demmert and Charles Backus did an excellent job executing the project from beginning to end. Tracking set locations, harvest, weighing, and delivery to the dock was well documented for the first year. Interactions with community members in Sitka were excellent, as it was in Hoonah, Angoon and Kake.

The perceived weight compared to the actual weight (certified scale weights of herring eggs) was unexpected and may explain the discrepancy between the ANS regulatory range and the actual herring egg weight required to meet subsistence needs. The ADF&G Subsistence Division household survey relies on non-observable estimates and not actual weights. Subsistence Division has noted that herring harvest effort has declined in recent years and further states in their report that it is one of several reasons for the decline in harvest.

However, the decline in effort does not necessarily equate to a decline in desire for herring eggs. One important aspect of this program is helping others, that is, providing herring eggs to community members that cannot harvest for themselves. One thing the 2009 program proved for certain is there was a greater supply of herring eggs for subsistence delivered to the dock than demand. Furthermore there was an almost unlimited volume of high quality eggs on the beaches in the Core Area; beaches adjacent to areas open for commercial harvest.

The herring egg program utilized two harvest boats in 2009; however, depending on demand for eggs and spawn timing it may be possible to harvest sufficient eggs with one boat. Use of one harvest boat would require significant advance effort to gather the necessary hemlock trees. Roughly it takes one tree per 500 pounds of eggs, and therefore a goal of 40,000 pounds of eggs on branches (actual weight) would require 80 trees or dense groups of branches.

One consideration for future operations is to have the second harvest boat stationed at another Sitka Harbor. Sealing Cove may be the second most used harbor due to easy access to the boat ramp for offloading eggs.

Study Design for Community-wide Utilization of Herring Egg on Branches

As noted in this report one of the problems encountered this year was actual weight versus perceived weight. This brings into consideration several questions:

1. What is the actual weight of the subsistence harvest in Sitka Sound?
2. What is the subsistence harvest effort?
3. What is the success rate? i.e. what is the harvest/effort or CPUE?
4. How does need/desire for herring eggs relate to availability in terms of distance to harvest area?

A scientifically defensible methodology needs to be implemented in order to document the total harvest of herring eggs on branches in Sitka Sound and one that answers the above questions. The current methodology used by ADF&G Subsistence Division is not transparent and does not attempt to produce these kinds of data.

A study design that provides the answers to the questions is relatively simple. The herring egg harvest including tree preparation is done in a short period of two weeks in early April and the eggs are primarily brought across one of six docks in Sitka – Starrigavan, Eliason, Thompson, ANB, Crescent, and Sealing Cove harbors. Based on the 2009 experience the majority of herring eggs come across the Eliason dock due to its drivable ramp and work float but also the dock's central location in Sitka and proximity to the core herring spawn areas to the north (i.e., Kasiana, Middle Islands).

In order to estimate harvest quantity samplers could observe the docks for harvesters subsequent to the first major spawn event. Harvesters could provide information to samplers or less invasively samplers could estimate weight of harvest, number of harvesters, size of containers used to transport the harvest, and frequency. All docks should be surveyed but proportional sampling could be done much as the king salmon creel surveys are constructed.

Estimating effort could consist of two elements: 1) interviewing harvester as they transit the docks as outlined above and 2) observations on the core subsistence areas for number of branch sets, size of branch sets, number of harvesters making sets, and size of harvest vessels.

Success rate should be estimated by combining effort with harvest amounts, lost or stolen branch sets, and weight of eggs per set.

The cheaper, in terms of time or money, for a cherished commodity or service, the greater the demand for that commodity or service. Many factors come into play regarding use and need of anything, including herring eggs. Important factors include weather, fuel prices, availability of hemlock trees/branches, ability to keep sets once made, and much more. Spawn location is also important but since ADF&G has been managing the herring resource the core area has received some level of spawn every year. The herring biomass, spawn density, and miles of spawn have increased steadily since the sac roe fishery began in the mid-70's. Herring biomass has increased 15 fold in that period.

Appendices

2009 shoreline spawn map

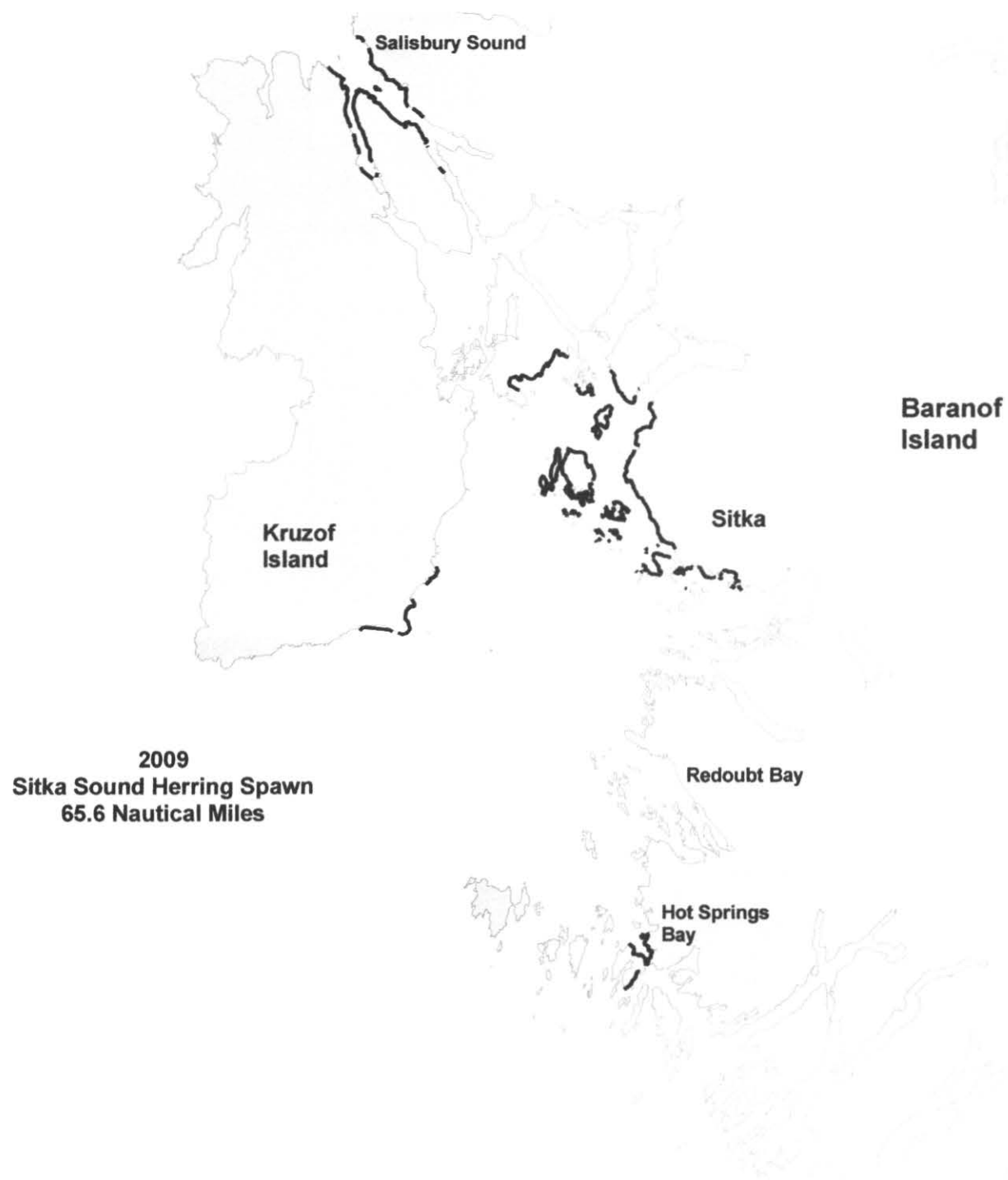
Hemlock tree/branch sets location maps

Herring egg on branches weights

Newspaper photographs pertaining to spawn and herring eggs

2009 shoreline spawn map

4



Hemlock tree/branch sets location maps

JULIA KAE

4/8/09
sets 19, 20
moved to
sets 23, 24
SE Kaslova Cove

4/3/09
set 23 ✓
5 trees

4/3/09
set 21 ✓
set 22 ✓
inside Crow

4/2/09 { set 3 moved to set 19 }
{ set 6 moved + set 20 }
5 trees
set 20
Fornow
Whiting Harbor

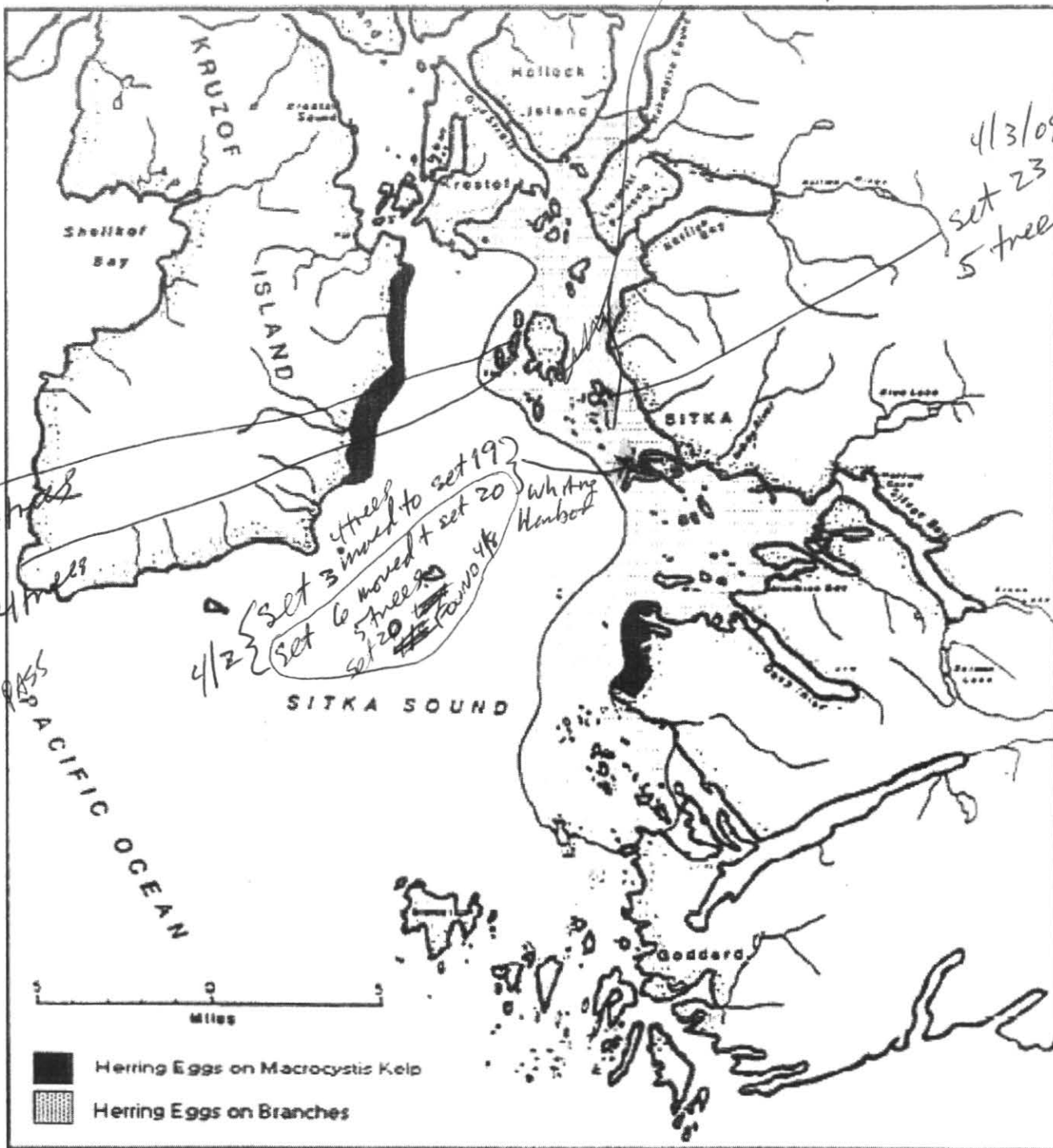
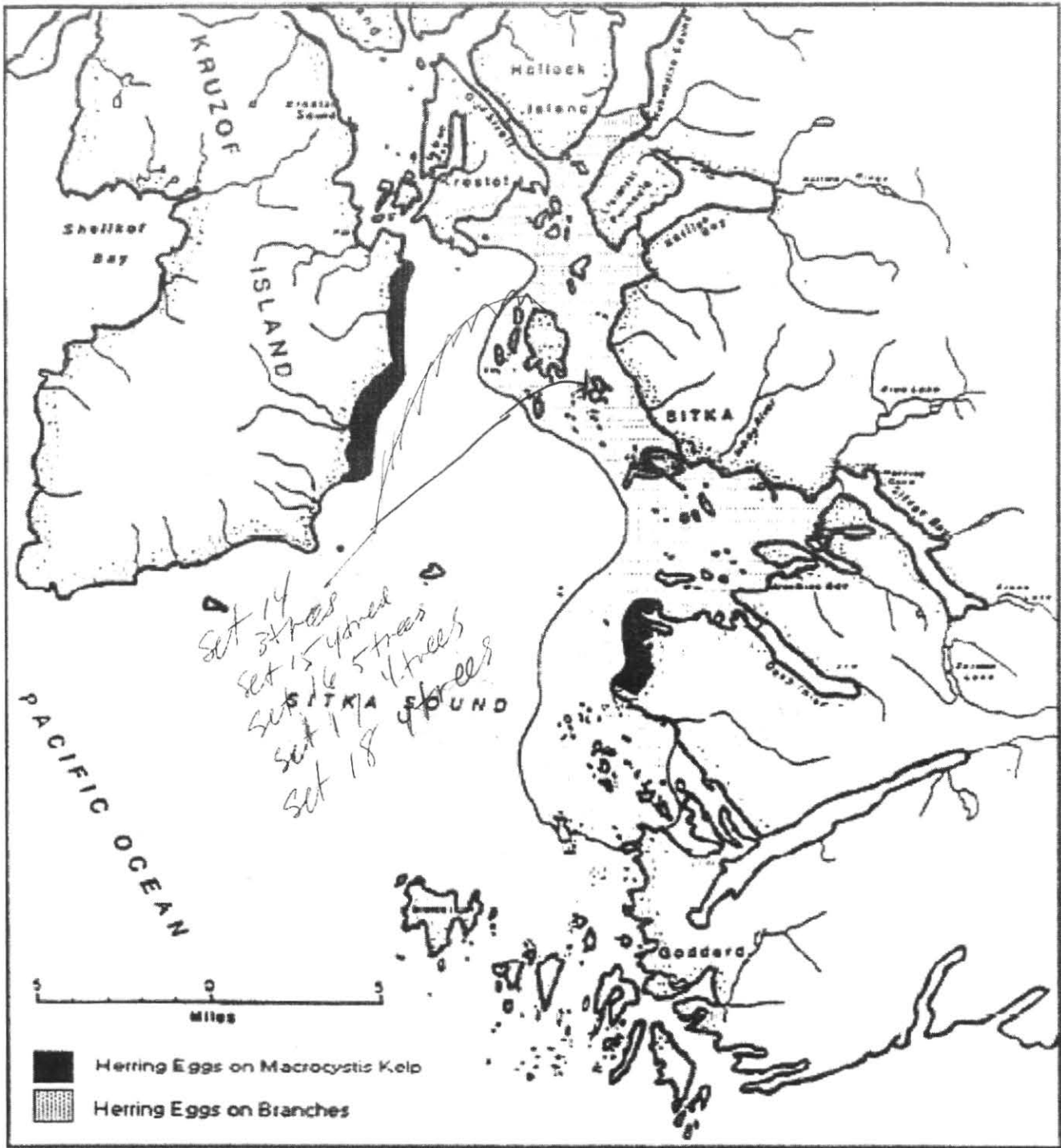


Figure 1. Areas Used for Harvest of Herring Eggs on Branches and on Kelp

Record area and date of branch set. It is important to have as much information as possible about the placement and harvest of herring eggs. _____



20

Figure 1. Areas Used for Harvest of Herring Eggs on Branches and on Kelp

Record area and date of branch set. It is important to have as much information as possible about the placement and harvest of herring eggs. _____

Map of the Sitka area showing sampling locations for Herring eggs. The map includes Krusenstern Island, Sitka Sound, and the Pacific Ocean. Handwritten notes indicate sampling sets and tree counts. A legend identifies Herring Eggs on Macrocytis Kelp (solid black) and Herring Eggs on Branches (hatched).

Handwritten notes on the map:

- Set 10 trees
- Set 11 trees
- Set 12 trees
- Set 13 trees
- Set 14 trees
- Set 15 trees
- Set 16 trees
- Set 17 trees
- Set 18 trees
- Set 19 trees
- Set 20 trees
- Set 21 trees
- Set 22 trees
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- Set 86 trees
- Set 87 trees
- Set 88 trees
- Set 89 trees
- Set 90 trees
- Set 91 trees
- Set 92 trees
- Set 93 trees
- Set 94 trees
- Set 95 trees
- Set 96 trees
- Set 97 trees
- Set 98 trees
- Set 99 trees
- Set 100 trees

Legend:

- Herring Eggs on Macrocytis Kelp
- Herring Eggs on Branches

25

Record area and date of branch set. It is important to have as much information as possible about the placement and harvest of herring eggs.

JULIA KAE

move 4/12
Set 6
Set 5 trees

lost
Set 5 trees
lost
Set 4 trees
lost
Set 3 trees
lost
Set 2 trees
lost
Set 1 trees
3/23



3

Figure 1. Areas Used for Harvest of Herring Eggs on Branches and on Kelp

Record area and date of branch set. It is important to have as much information as possible about the placement and harvest of herring eggs.

Herring egg on branches weights

Herring Eggs on Branches

6482

Julia Kae

Pick #1

Herring Eggs on Branches

Date of Branch Set	Date of Branch Retrieval	Location	Weight	Comments
4-3	4-9	middle Crow Is.; Crow Pass	480	set 21
			410	
			492	
			300	
4-3	4-9	S. Crow Is.; Pass side	472	set 22
			488	
			520	
			480	
			618	
			624	
4-3	4-9	S. Crow Is. outside	604	Set 9
			105	Part Stolen = 1/4 stolen
	4-9	S. Crow Is. outside	105	Set 7 Stolen = 3/4 stolen
4-3	4-9	S.E. B. to Kasirama	428	Set 23
			384	
			442	
			344	
			<hr/>	
			7,296	
			<hr/>	
			230	
			380	
			338	
			320	
			158	
			<hr/>	
			1,426	
				Net 5,870.

set 8
stolen before
any spawn

42916 / total
17 | 7296
68
44
34
158
153

Returned to Sea

JULIA KAE

PICK #2

Herring Eggs on Branches

Date of Branch Set	Date of Branch Retrieval	Location	Weight	Comments
4-8	4-10	SE Kigiana	454 226	set 23 4 small trees
4-8	4-10	SE Kigiana	430 378	set 24 4 small
3-23/4-7	4-10	NW Kigiana	440 542 558 434 636 <u>4098</u>	set 1 3 trees } one tree! } one tree
			<u>196</u> 3,902	sticks; twigs net given out

455 16/100
914098
30
49

JULIA KAE

PICK #3

Herring Eggs on Branches

Date of Branch Set	Date of Branch Retrieval	Location	Weight	Comments
3/26	4-10	between HPM and cannon house	490	whole fries
↓	↓		270	set ↓ 12 (1334)
			120	
			454	
			80	Set 10
			280	(1130)
			80	
			690	Set 11
			700	Set 11
			60	(1212)
			212	
			240	
3/29		NW Kasena	730	Set 18
↓			456	(1,666)
			480	
			296	Set 14
			500	(1,946)
			1150	
			202	Set 15
			372	(1,472)
			320	
			578	
			292	Set 16
			390	(2,203)
			680	
			220	
			391	
			230	
			132	Set 17
			602	(2,076)
			1342	

Set 13 stolen
4 trees

Herring Egg Form 2009

13,039#

420 16/101
311 13,039
124
63
62

Traci C sets

Kasiana ls

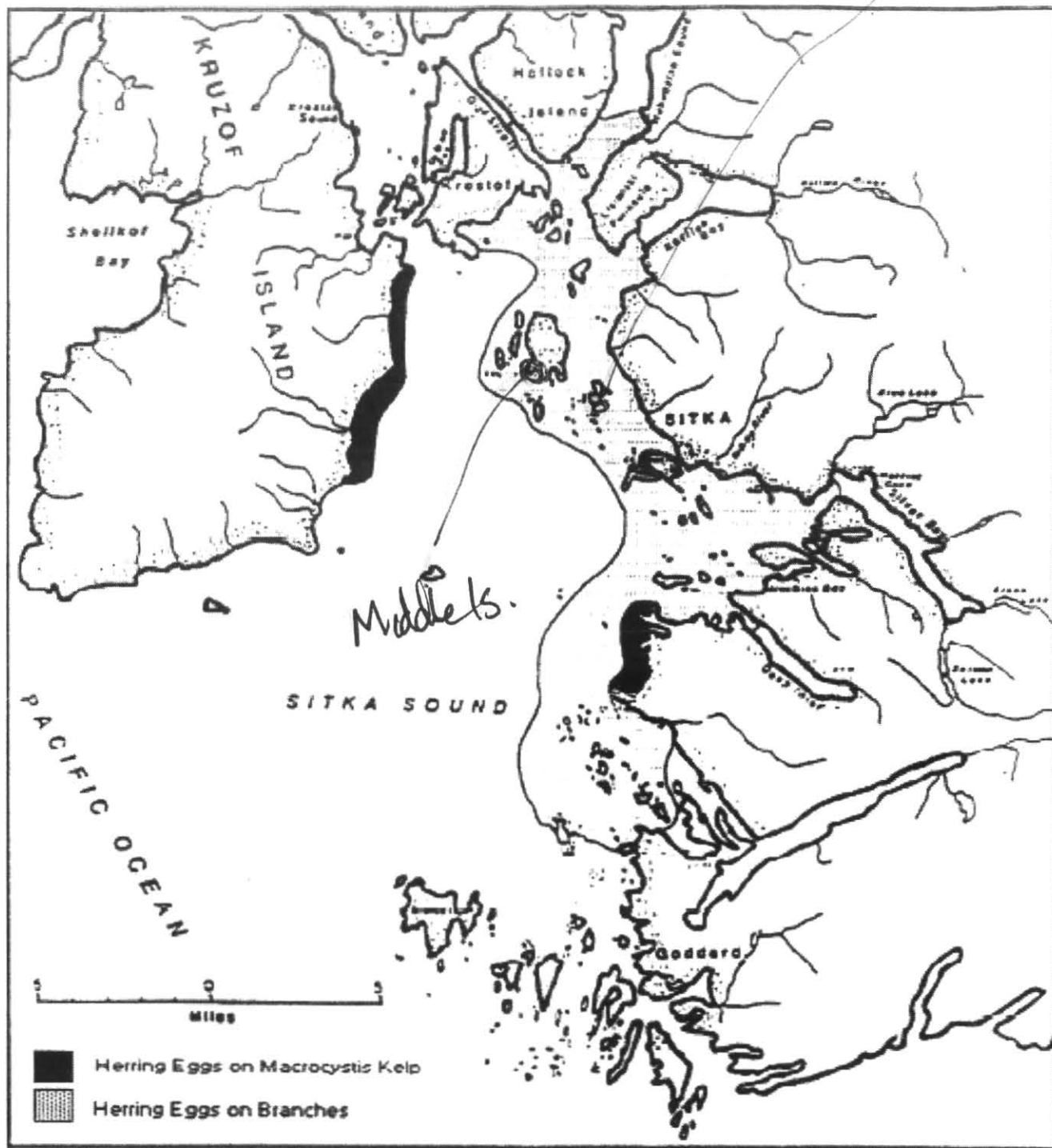


Figure 1. Areas Used for Harvest of Herring Eggs on Branches and on Kelp

Record area and date of branch set. It is important to have as much information as possible about the placement and harvest of herring eggs. _____

Herring Eggs on Branches

Date of Branch Set	Date of Branch Retrieval	Location	Weight
4/6/09	4/10/09	Southwest	
4/6/09	4/10/09	Side	
4/6/09	4/10/09	of	
4/6/09	Ø	Middle	
4/6/09	Ø	Island	
4/7/09	4/11/09		
4/7/09	4/11/09		
4/7/09	Ø		
4/8/09	4/12/09		
4/8/09	Ø		
4/9/09	4/13/09	South side	1100
4/9/09	4/13/09	of	400
4/9/09	Ø	KASIAN A	
4/9/09	Ø	Island	

150 people one day
300 total in 4 days

Total Tracil
15,795 lbs
2,000
17,795 lbs

A letter addressing the people of Sitka and Sitka Tribes of Alaska:

I would like to make a response to the herring eggs controversy:

I do not know the politics behind the issues and therefore I wish to speak only on how the Southeast Herring Conservation Alliance and Steve Demmert have impacted our community. Last year, the Julia Kae, Steve Demmert and his crew delivered herring eggs to Wrangell, Alaska. This was quite a gift to our community because it has been numerous years since a boat delivered herring eggs to our town. It was a wonderful event and the majority of the town came out to join in the receiving of the eggs. I see this not as one person giving, but as our culture stresses, "providing for the entire community" and that community is Southeast Alaska.

I hope this distribution continues. I would like to thank, Steve Reifentuhl, Executive Director of the Southeast Herring Conservation Alliance and Steve Demmert, captain of the Julia Kae for providing Wrangell with herring eggs. It strengthened our Native community through the act of sharing with us and the community sharing with you through bartering.

Gunalche'esh,

X'atshaawditee (Tammi Meissner)

Wrangell Resident

An open letter to the people of Sitka and Sitka Tribe of Alaska:

Hello,

I would like to respond to recent events surrounding the subsistence harvest of herring eggs on branches. It has come to my attention that some members of STA are concerned about my involvement in the program that has developed over the past three years to provide subsistence herring eggs on branches for those in the communities of Sitka, Hoonah, Angoon, Kake, Wrangell, and Ketchikan. We provide for people who either are unable to harvest on their own or are not fulfilling their needs with their own efforts.

Three years ago when I purchased the *Alice H* from Sitka's own family, the Enloes, after Sonny's death, I was asked if I would carry on Sonny's tradition of bringing in egg covered trees to give away to the community. I didn't have to think very long or very hard about what an honor it would be to follow in his footsteps and continue to use his boat (albeit with a new name) to help feed the need. As a Ta Kwan Nadi/Eagle Tlingit who is a member of the Demmert family originally from Klawock/Craig, it also struck a cord in me to help others when asked. Demmert family members have a long standing history in Southeast Alaska as teachers and healthcare providers and of course, fishermen. These professions contribute to the betterment of their communities and for humankind in general.

In light of the current concern about my participation in providing herring eggs on branches let me clarify what I hear is the main concern. As a non resident, I provide the F/V Julia Kae with Alaska and Sitka resident crew during the herring fishery in which I am a small tender for the fishery. When we set branches and retrieve eggs I have had as many as four residents on board at one time and always no less than one full time crewman. In 2010 Henry Larsen (Munch) was instrumental in the success of the program. Additionally, I have had residents Andy Larsen, Jeff Katasse, Walt Samuelson, Ernie Karras and Justin Schalon harvesting eggs on branches.

How the hairs get split on my involvement is out of my hands but I have witnessed the joy, gratitude, and appreciation that our efforts have brought to hundreds of Southeast Alaskans. I hear from people that eggs are being sent all around Alaska and the lower 48 as far away as Florida. Lest the members of STA forget, in 2008, the first year we were asked to bring eggs to the dock, STA members brought a pickup truck to the dock and backed right up to our rail and loaded it no less than twice. They were delighted, very thankful and appreciative to have been able to receive eggs from us to distribute to elders and others. We were pleased they came and partook of the bounty. It didn't matter to me who came and took eggs, we were providing, and a need was being met.

We weigh our harvest and contribute to the science and understanding of herring egg harvest in Sitka Sound. In 2010 we delivered nearly 30,000 pounds of herring eggs on branches to the dock in Sitka alone. After loading the Julia Kae with another 30,000 pounds and setting off to Hoonah, Angoon, Kake, Wrangell and Ketchikan, the *Traci C* a Sitka based boat harvested an additional 3,000 pounds. The *Traci C* was at the dock in

Sitka the weekend after we left and for two days' efforts were able to give away only 300 pounds. It appeared the demand had been met. The remaining eggs were returned to the sea to hatch. Much has been said about the impacts of the fishery on subsistence and I do not have enough first hand knowledge to get into the fray. But I think we are demonstrating that with our efforts and those of individuals going out on their own, AND the efforts of STA with their own vessel, the subsistence needs ARE being met, coincidentally with a healthy fishery.

In closing, I'd like to thank the members of STA for identifying the need for someone to step up and fill a void in the subsistence harvest of herring eggs. Without a clear voice identifying the need, hundreds of families around Southeast and their friends and relatives may not be receiving the eggs they now do. I'm proud to be the one who was asked and proud of the success we've helped to achieve. Our program is now sponsored by the Southeast Herring Conservation Alliance, a group made up of the Sitka Sac Roe Herring fishermen. In one capacity or another, I hope to continue providing herring eggs on branches to the people of Sitka and Southeast into the future.

Very truly yours,
Steve Demmert
F/V Julia Kae

Newspaper photographs pertaining to spawn and herring eggs

SITKA SENTINEL

Locally owned newspaper serving Sitka since 1940 • www.sitkasentinel.com

WEEKEND EDITION

Sitka, Alaska

Friday, April 10, 2009

12 Pages



Sentinel Photo by James Poulson

Fertile Shore

A fisherman jigs for herring in an area of spawn near the O'Connell Bridge Thursday afternoon. A Department of Fish and Game official

said on Thursday there were about 31 miles of active spawn in Sitka Sound. (Sentinel Photo by James Poulson)

TRADITIONAL DELICACY



Alice Demmert lets her nephew, Gifford Peratrovich, pick out herring eggs Wednesday at her home. Another nephew of Demmert's participated in the herring fishery in Sitka recently, and dropped off a couple of boxes of eggs for Demmert and her family. Peratrovich commented that "when we Native people eat this, we feel 10,000 years old."

Staff photo by Hall Anderson



FREE EGGS - Grace Gjertsen, 6, is all smiles as she receives a bag of herring eggs from Doug Smith, a crewman aboard the Julia Kae, at Eliason Harbor Thursday. The crew plans to give out herring eggs at the harbor to anyone interested through Satur-

day. This is the second year the Julia Kae crew have stayed in Sitka, after working as fish tenders during the commercial sac roe fishery, to provide eggs to those without access to spawning areas. (Sentinel Photo by James Poulson)

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

Subsistence Survey & Herring Egg Branch Programs 2010

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O.Box 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

Herring Eggs on Branches & Subsistence Survey - 2010

Goal of Program: Obtain 60,000 to 100,000 lbs of eggs on branches, trimmed weight without bole of tree, and help meet herring eggs subsistence needs in Sitka and outlying communities of Hoonah, Angoon, Kake, Wrangell, Ketchikan, & Klawock. Survey herring egg harvest to estimate weight of harvest from observations of Sitka's six boat harbors and docks.

Abstract:

F/V Julia Kae and crew set branches, harvested, and deliver eggs to Sitka; they also transported eggs to five outlying communities. A total of 70,321 pounds of eggs were harvested on branches less than ½" diameter. Of the total harvest, 35,763 pounds of eggs were delivered to Eliason Harbor and distributed to community members. A total of 5,494 pounds of live eggs were not wanted through the five days of delivery, and therefore returned to the ocean. In addition, 29,064 pounds of herring eggs were transported and distributed to Hoonah, Angoon, Kake, Wrangell, and Ketchikan (Klawock had representation in Ktn).

A dock survey was introduced to the scope of work in 2010. Personnel made observations each day from April 7 – 12, 2010. Observations were concentrated at the primary and secondary egg transfer harbors/docks, although observations were made at six docks through the period. Estimated weights were made based on container size and shape. The total herring egg harvest weight was estimated at 13,185 pounds (not including SHCA program), which certainly represents a minimum harvest weight. The actual harvest weight cannot be determined precisely although this estimate is thought to capture the majority of the harvest. An expanded dock survey methodology could easily determine estimates that are transparent, data driven, and most importantly could provide true precision and accuracy of subsistence harvest.



Photo 1. Branch gathering in preparation for herring egg spawning substrate.



Photo 2. Hemlock trees/branches on aft deck F/V Julia Kae in 2010. Two loads of branches were used to make about 32 sets consisting of 2 to 4 trees per set.



Photo 3. Rigging anchor line and buoy on hemlock tree bole for 2010 herring subsistence set.



Photo 4. Retrieving set, removing branches to 1/2" diameter and filling Trayco tote with herring eggs for weighing.

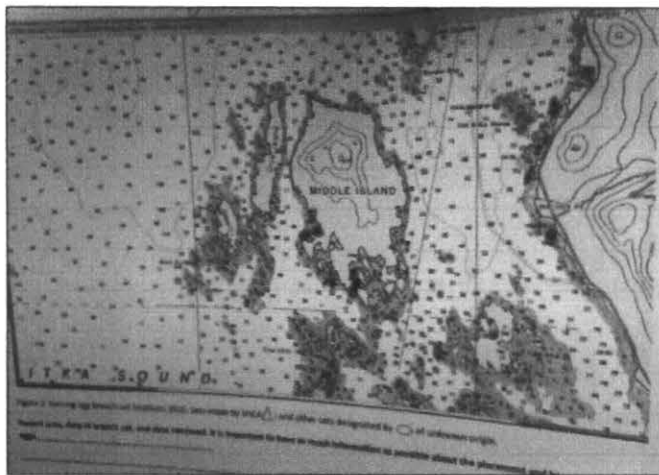


Figure 1. Typical location map of sets made by F/V Julia Kae. Date & time of set, number of trees in set and retrieval times were recorded on map and data sheet; weights & comments were recorded.



Photo 5. Branches, tree boles for discard were not counted in the egg weights.



Photo 6. On the herring egg harvest grounds gathering eggs in totes, weighing, and placing eggs on rear deck for delivery and disbursement at Eliason Harbor dock in Sitka.

Methodology:

Herring Egg Program

The F/V Julia Kae and crew cut and set 115 hemlock trees for herring egg spawn in 2010. The boat was loaded with trees and sets were primarily in the Kasiana, Middle Island and Halibut Point Road areas. Sets were also marked on a GPS plotter. Sets were anchored with rocks and marked with a buoy. Trees were left to soak until the herring spawned. Once trees were covered with dense spawn, they were hoisted up via block on hydraulic gear so the butt end of the tree was sufficiently high to cut branches for retrieval of the eggs.

Eggs on branches less than ½" diameter were placed in a Trayco tote and weighed. Weights were recorded and eggs on branches placed on a deck tarp and covered until the next set was pulled. Approximately 3,000 to 5,000 lbs were brought on board before returning to Eliason Harbor. This weight was about the maximum weight that people would take in one day, depending on day of the week and demand. Herring egg branches were kept out of the sunlight and sprayed with water every couple hours to keep them moist and in optimum condition.



Photo 9. Captain Steve Demmert and F/V Julia Kae at harbor April 2010.

Photo 10. Sitka community member loading box on the rear deck of Julia Kae in 2010.



The F/V Traci C was lined up to finish the herring egg branch retrieval and distribution so the Julia Kae could begin transport and distribution of approximately 30,000 lbs. to outlying communities. Public service announcements on radio stations and word of mouth advertised the egg program. Newspaper stories also promoted notice. Outlying communities were notified by phone at least a day ahead of time to announce arrival of the Julia Kae.



Figure 11. Herring egg distribution at Eliason Harbor on a sunny day. Note eggs are shaded from sun. A fresh load just arrived, 11 people sharing the harvest.

Photo 12. Loaded with herring eggs, the crew of Julia Kae ready for the 5 day journey to outlying communities in 2010.



Estimate of Subsistence Harvest at Harbors/Dock Program

The herring egg harvest, including tree preparation, is done in a short period of two weeks in late March or early April depending on herring spawn timing. The eggs are primarily brought across one of six docks in Sitka – Starrigavan, Eliason, Thompson, ANB, Crescent, and Sealing Cove harbors. Based on the 2009 experience the majority of herring eggs come across the Eliason dock due to its drivable ramp and work float but also the dock's central location in Sitka and proximity to the core herring spawn areas to the north (i.e., Kasiana, Middle Islands).

In order to estimate harvest quantity, samplers observed the docks for harvesters subsequent to the first major spawn event. Harvesters were not spoken to unless they approached the samplers. Samplers estimated the weight of harvest, the number of harvesters, the size of containers used to

transport the harvest, boat size, and frequency. All docks were surveyed but proportional sampling was implemented to survey the greatest number of harvesters.

Observations of branch sets by community members were made on the spawning grounds but were not part of the dockside survey and therefore will not be reported here.

Results

Herring Egg on Branches Distribution Program

The F/V Julia Kae set some 115 trees for a harvested total of 70,321 pounds of eggs. Of the total harvest, 35,763 pounds of eggs were delivered to Eliason Harbor and distributed to the community members. Approximately 3,000 lbs of eggs were picked from sets the Julia Kae made and delivered to Eliason Harbor by the Traci C. A total of 5,494 pounds of live eggs were not taken by community members through the five days of delivery, and therefore returned to the ocean. Three thousand of these pounds were from the last day when Sitka's appetite for eggs seemed to be sated and no one showed up to take eggs.

Another 29,064 pounds of herring eggs were transported and distributed by the Julia Kae to Hoonah, Angoon, Kake, Wrangell, and Ketchikan (Klawock had representation).

Between April 7 and April 12, hundreds of people, some multiple times, came to Eliason Harbor to get herring eggs. No one person attempted to keep track of the numbers of people because all hands were helping people box, bag, or bucket eggs. The Julia Kae crew helped trim branches to community member needs in order to fit them into containers. Demand for herring eggs fell off on April 12th and the effort was discontinued that evening. All remaining eggs not claimed were returned to the ocean and not counted in the total weight provided to community members.

Estimate of Subsistence Harvest at Harbors/Dock Program

Observations were made from April 7 to April 12, 2010. Based on estimates the total for all six harbors/docks was 13,185 lbs for the period. Breaking it down by dock:

Eliason	9,500 lbs
ANB	5 lbs
Crescent	0
Sealing Cove	1,960 lbs
Old Thompson	1,220 lbs
<u>Starrigavan Boat Launch</u>	<u>500 lbs</u>
Total	13,185 lbs

Discussion

The goal was to harvest was 60,000 to 100,000 pounds of herring eggs on branches which was met with 70,321 lbs harvested. The estimated harvest, not including the SHCA component was 13,185, although the survey missed some portion of the harvest. If we assume the estimate is roughly half the actual undocumented harvest, and double the 13,185 and round to 30,000 lbs the combining subsistence harvest transiting Sitka's docks was on the order of 65,000 lbs. with another 29,064 lbs going to outlying communities. Naturally, a portion of the estimated 13,185 lbs was shared with friends outside of Sitka, however no estimate was made of that.

Conclusions

Herring Egg Program

Harvesting is a time consuming and arduous task. The 'high harvesters' of the recent past, Sonny Enloe, Merle Enloe, George Hamilton, Leonard Skeek and others have either passed on or no longer fish. Without large scale platforms it is difficult to harvest large quantities of herring eggs unless hundreds and hundreds of community members participate. As Gemelch and Gemelch documented in 1985, and the 2011 Subsistence Division Report No. 343 reported, participation is declining. Reasonable opportunity was demonstrated in both 2009 and 2010. Between 30,000 and 35,000 lbs were available, offered and received at Eliason Harbor, in '09 and '10, respectively; however in both years by the time 30,000 lbs was distributed, the demand fell off.

The herring branch program was a tremendous success in terms of harvest quantity, egg quality, documentation of weights, and distribution to Sitka, Hoonah, Angoon, Kake, Wrangell, and Ketchikan. Success cannot be measured in quantity alone, the people and spirit shared was priceless.

Estimate of Subsistence Harvest at Harbors/Dock Program

This was the first year to estimate subsistence harvest using harbor/dock survey methodology. This type of survey is similar to the King Salmon creel census that ADF&G employs to estimate the number of sport caught king salmon in southeast Alaska. The Fish & Game census is far more complicated because sport caught kings occur throughout Southeast and for a duration of several months. Conversely, subsistence herring harvest in Sitka Sound transpires in a short duration of several days and across only six harbor/docks. The estimate arrived at in 2010 is not perfect but it is a demonstration of what could be done to accurately estimate ANS.

delivered at Eliason. The other five docks represented the balance. The estimated total weight was 13,185 pounds; this does not include SHCA's 35,000 lbs. Considering that the crew of Julia Kae was almost always at Eliason Harbor, the distribution point for SHCA eggs, it is likely we observed better than half the local harvest.

Appendices

2010 shoreline spawn map

Hemlock tree/branch sets location maps

Herring egg on branches weights

Newspaper photographs pertaining to spawn and herring eggs

Subsistence harvest survey data

SHCA Herring Eggs on Branches

Total Egg Harvest

64,827

Date of Branch Set	Date of Branch Retrieval	Location	Weight	Subtotal Weight	Comments
30-Mar	10-Apr	North Kasiana Is.	2,828		2 trees
30-Mar	10-Apr	North Kasiana Is.	4,190		3 trees
30-Mar	11-Apr	North Kasiana Is.	2,276		4 trees
30-Mar	11-Apr	North Kasiana Is.	2,786		4 trees
				12,080	
31-Mar	7-Apr	South Kasiana Is.	1,500		3 trees
31-Mar	7-Apr	South Kasiana Is.	2,215		4 trees
31-Mar	7-Apr	South Kasiana Is.	2,045		4 trees
31-Mar	7-Apr	South Kasiana Is.	1,260		3 trees
31-Mar	9-Apr	South Kasiana Is.	4,338		4 trees
31-Mar	9-Apr	South Kasiana Is.	2,132		3 trees, 1 tree stripped of eggs & branches
31-Mar	7-Apr	South Kasiana Is.	2,215		4 trees
				15,705	
1-Apr	12-Apr	Southwest Middle Is.	1,849		2 trees
1-Apr	12-Apr	Southwest Middle Is.	775		3 trees
1-Apr	12-Apr	Southwest Middle Is.	360		3 trees
1-Apr	12-Apr	Southwest Middle Is.	1,920		3 trees
1-Apr	12-Apr	West Middle Is.	382		3 trees
1-Apr	12-Apr	West Middle Is.	2,242		3 trees
1-Apr	12-Apr	West Middle Is.	2,589		4 trees
				10,117	
3-Apr	11-Apr	Road between H.P. & H.P.M.	light spawn no retrieval		
3-Apr	11-Apr	Road between H.P. & H.P.M.	light spawn no retrieval		
3-Apr	11-Apr	Road between H.P. & H.P.M.	light spawn no retrieval		
3-Apr	11-Apr	Road between H.P. & H.P.M.	light spawn no retrieval		
				0.00	
4-Apr	12-Apr	West Kasiana Is.	1,238		4 trees
4-Apr	12-Apr	West Kasiana Is.	1,884		4 trees
4-Apr	12-Apr	West Kasiana Is.	3,382		3 trees
4-Apr		West Kasiana Is.	1,000		Traci C pulled, 4 trees
4-Apr		West Kasiana Is.	980		Traci C pulled, 3 trees
4-Apr		West Kasiana Is.	1,330		Traci C pulled, 4 trees
4-Apr		West Kasiana Is.	-		stolen, 4 trees
4-Apr	12-Apr	West Kasiana Is.	6,800		4 trees
4-Apr	7-Apr	South Kasiana Is.	2,742		3 trees
4-Apr	9-Apr	South Kasiana Is.	1,926		3 trees, 1 tree stripped of eggs & branches
				21,082	
5-Apr	12-Apr	Southeast Middle Is.	1,726		3 trees
5-Apr	12-Apr	Southeast Middle Is.	925		2 trees
5-Apr	12-Apr	Southeast Crow Is.	1,075		3 trees
5-Apr	12-Apr	Southeast Crow Is.	2,117		2 trees
				5,843	

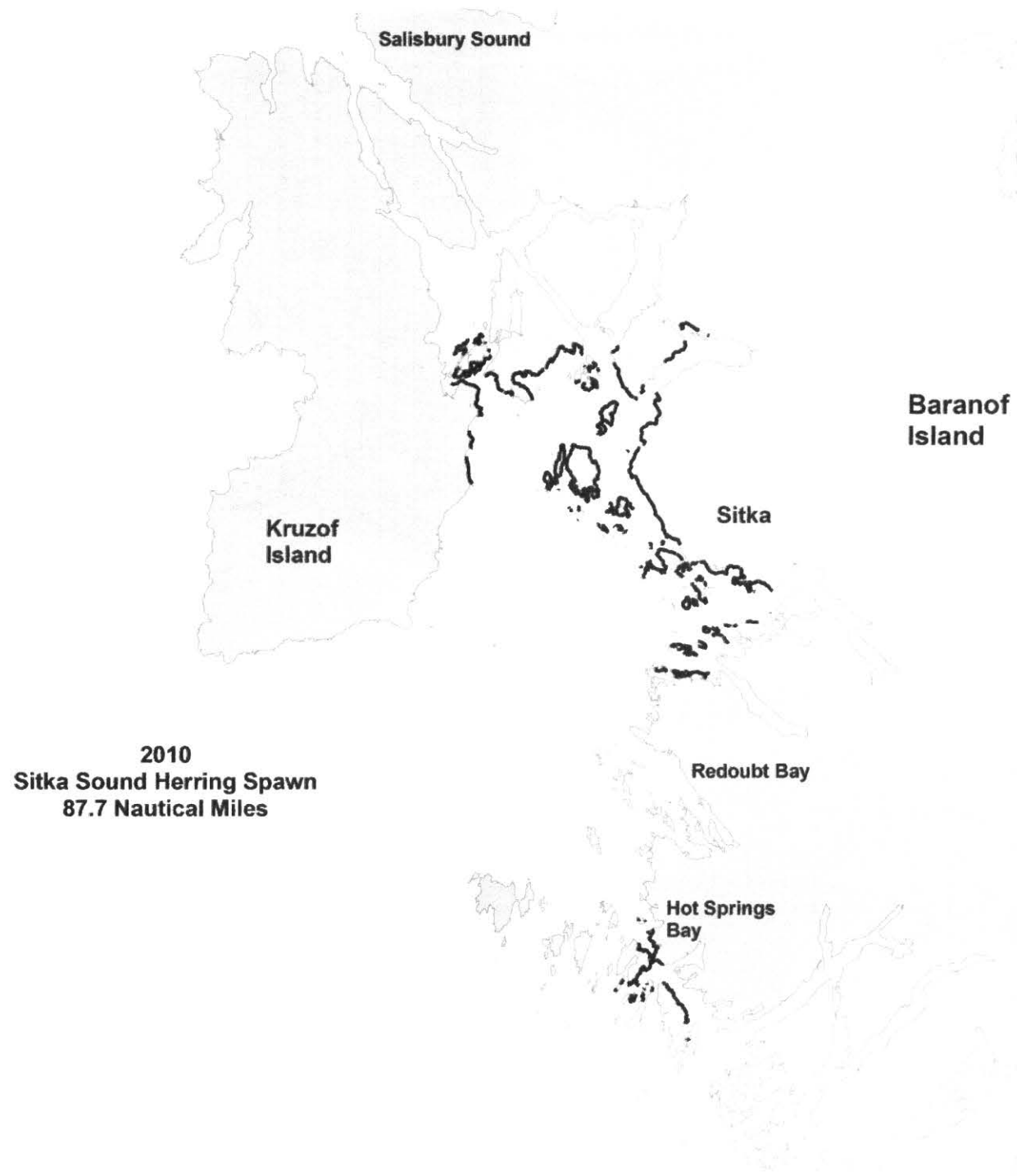
Categories	Actual Harvest numbers
discard to ocean but good eggs	5,494
to Sitka (lbs.)	32,453
to Sitka by Traci C (lbs.)	3,310
to Outlying Comm. (lbs.)	29,064
	70,321
70,321 - 5,494 = 64,827 lbs provided	

Herring Egg Form ~~2010~~ ²⁰¹⁰

Sent to Subsistence Div
STA survey

2010 shoreline spawn map

4



Hemlock tree/branch sets location maps

4/1/10 Middle Island s.w. side

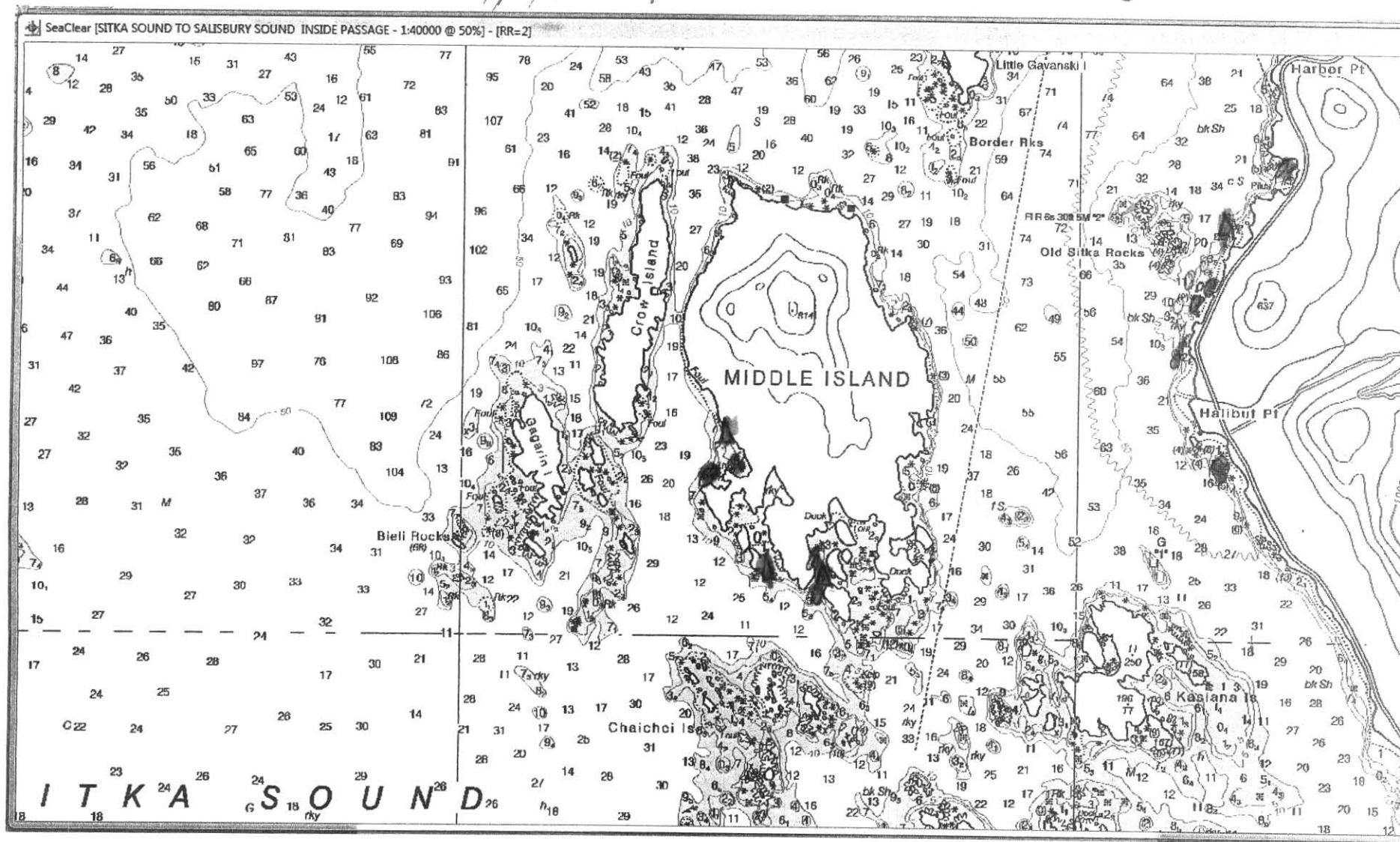


Figure 2. Herring egg branch set locations 2010. Sets made by SHCA \triangle ; and other sets designated by \bigcirc of unknown origin.

Record area, date of branch set, and date retrieved. It is important to have as much information as possible about the placement and harvest of herring eggs.

3/30/10

NW Kasiana Is.

3/31/10 SE Kasiana Is.

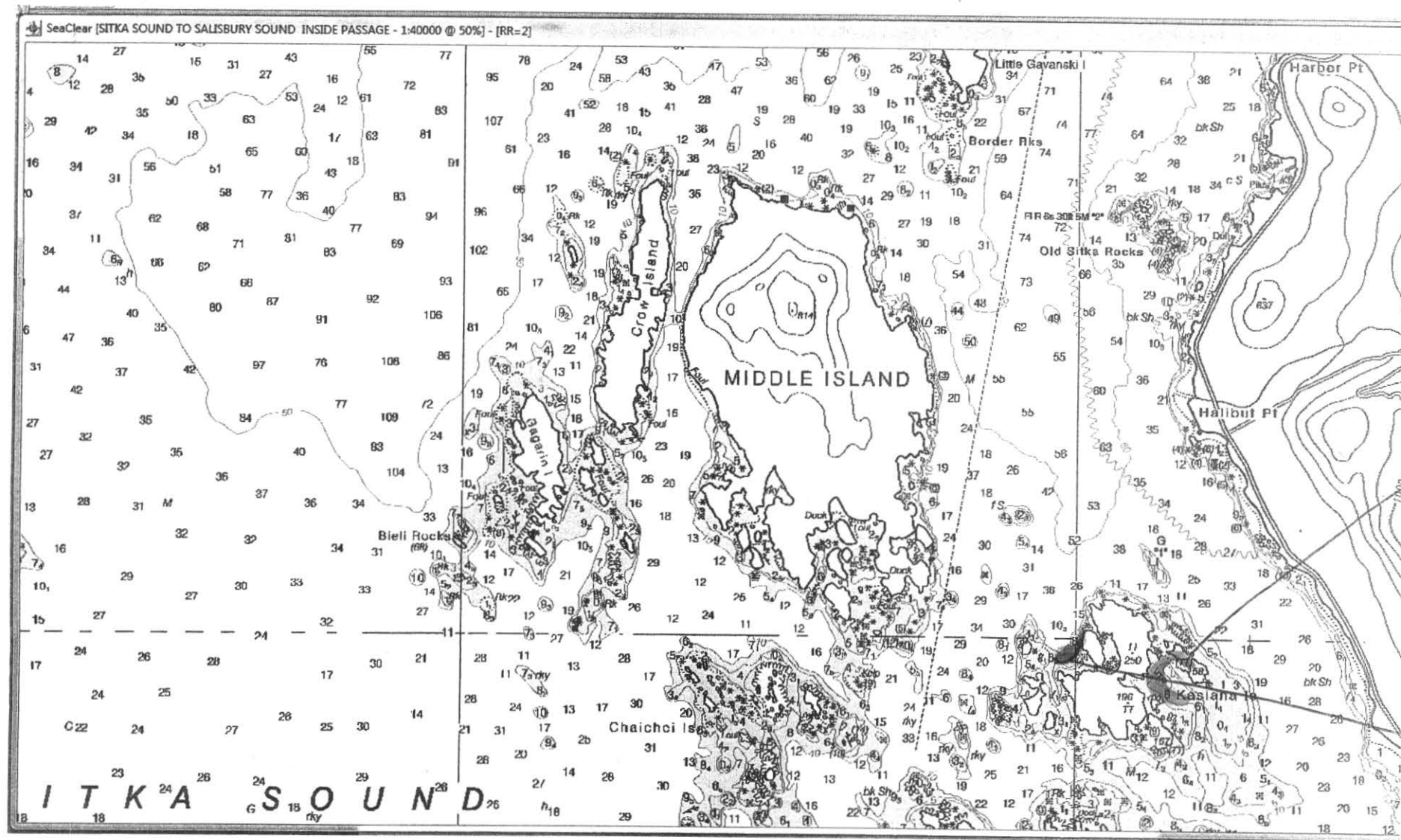


Figure 2. Herring egg branch set locations 2010. Sets made by SHCA Δ ; and other sets designated by \bigcirc of unknown origin.

Record area, date of branch set, and date retrieved. It is important to have as much information as possible about the placement and harvest of herring eggs. _____

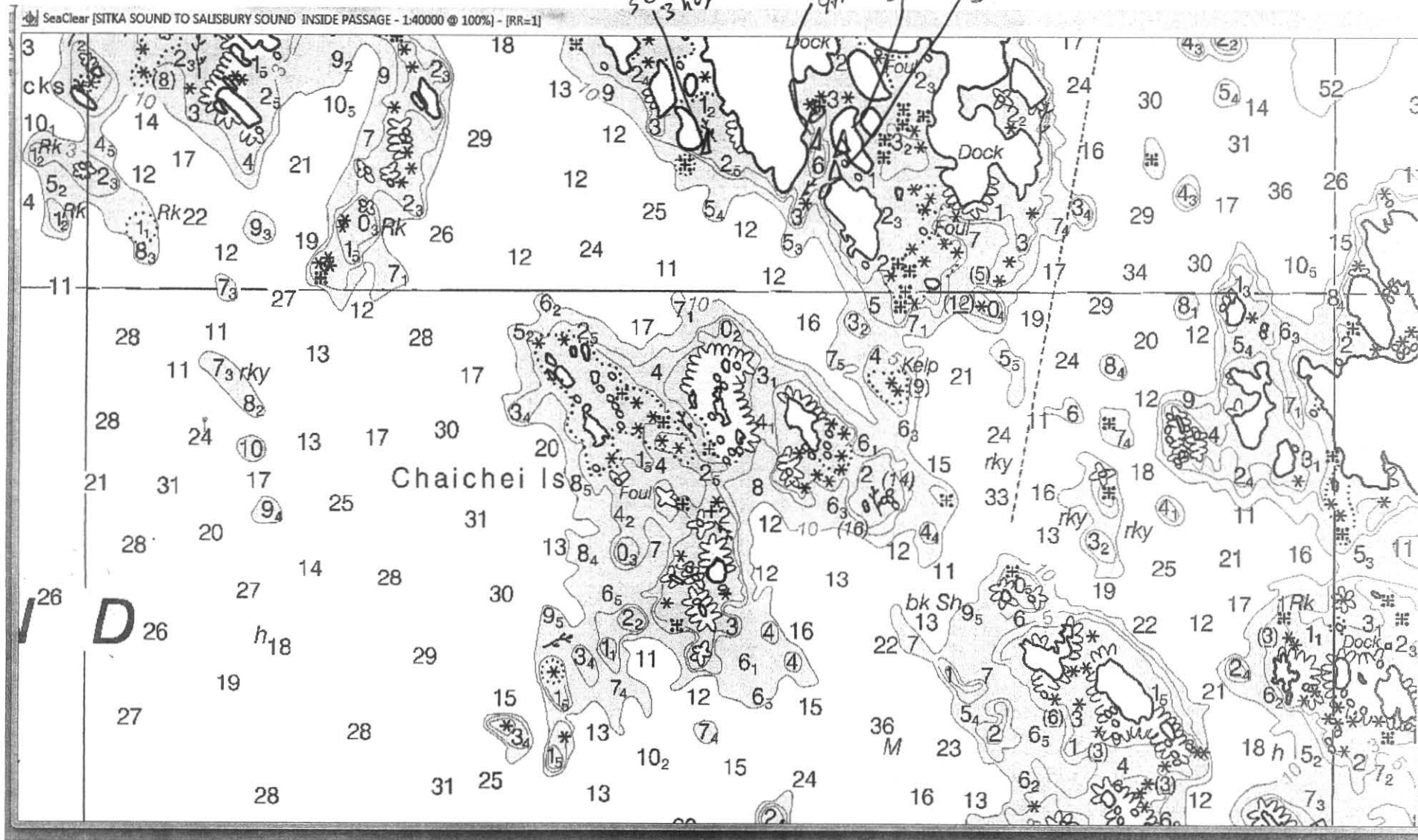


Figure 5.

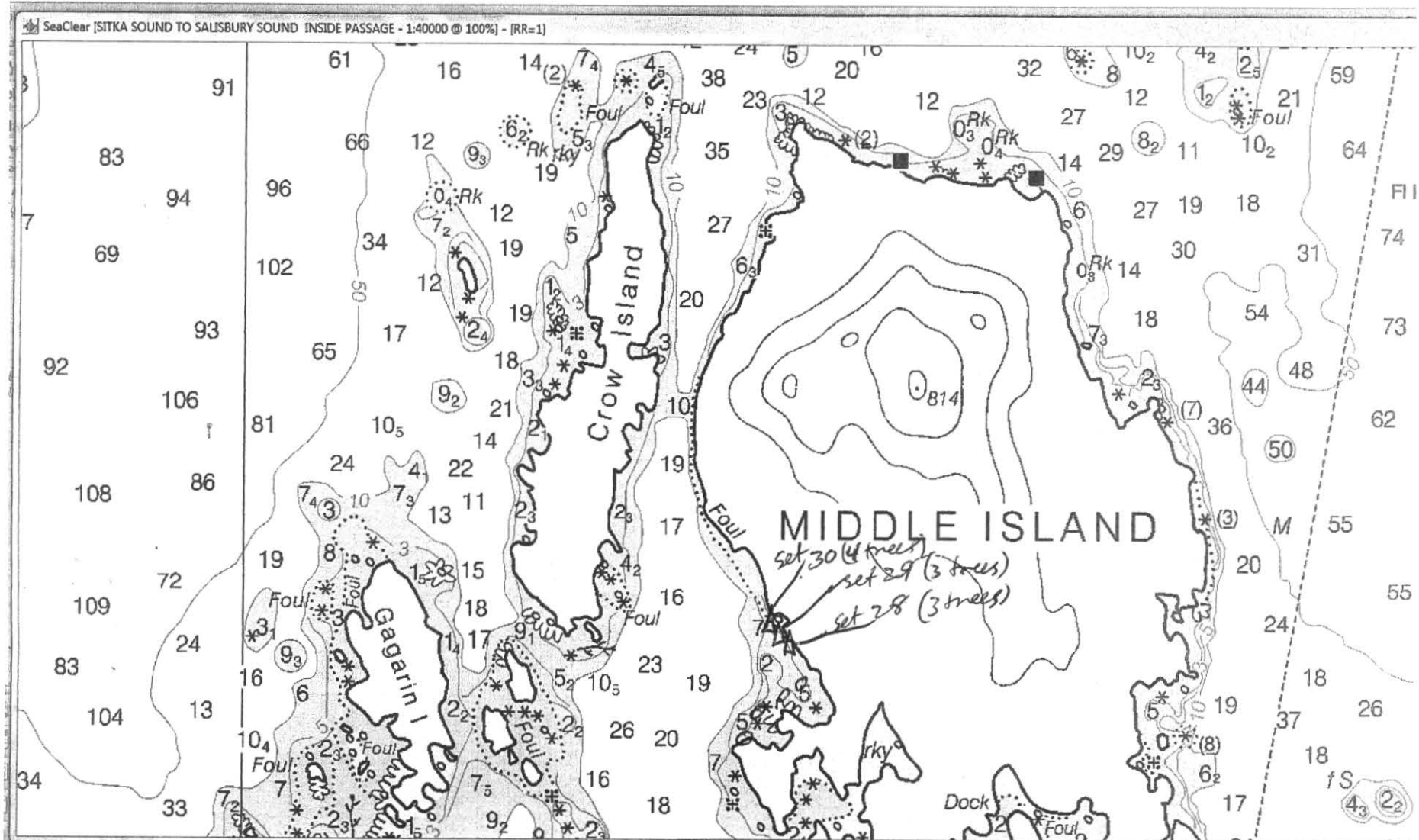
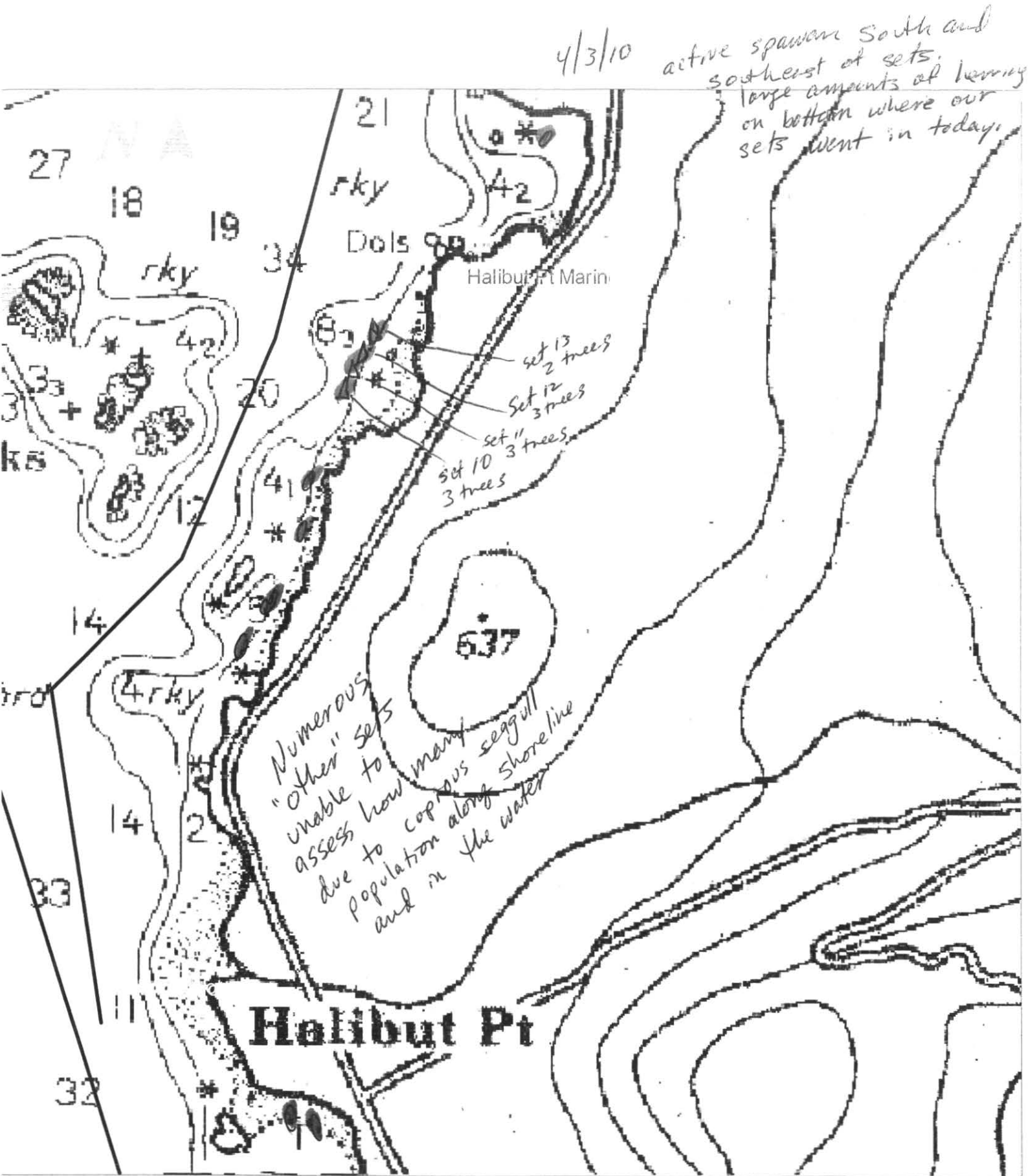


Figure 4.



Kasiana Ts. sets

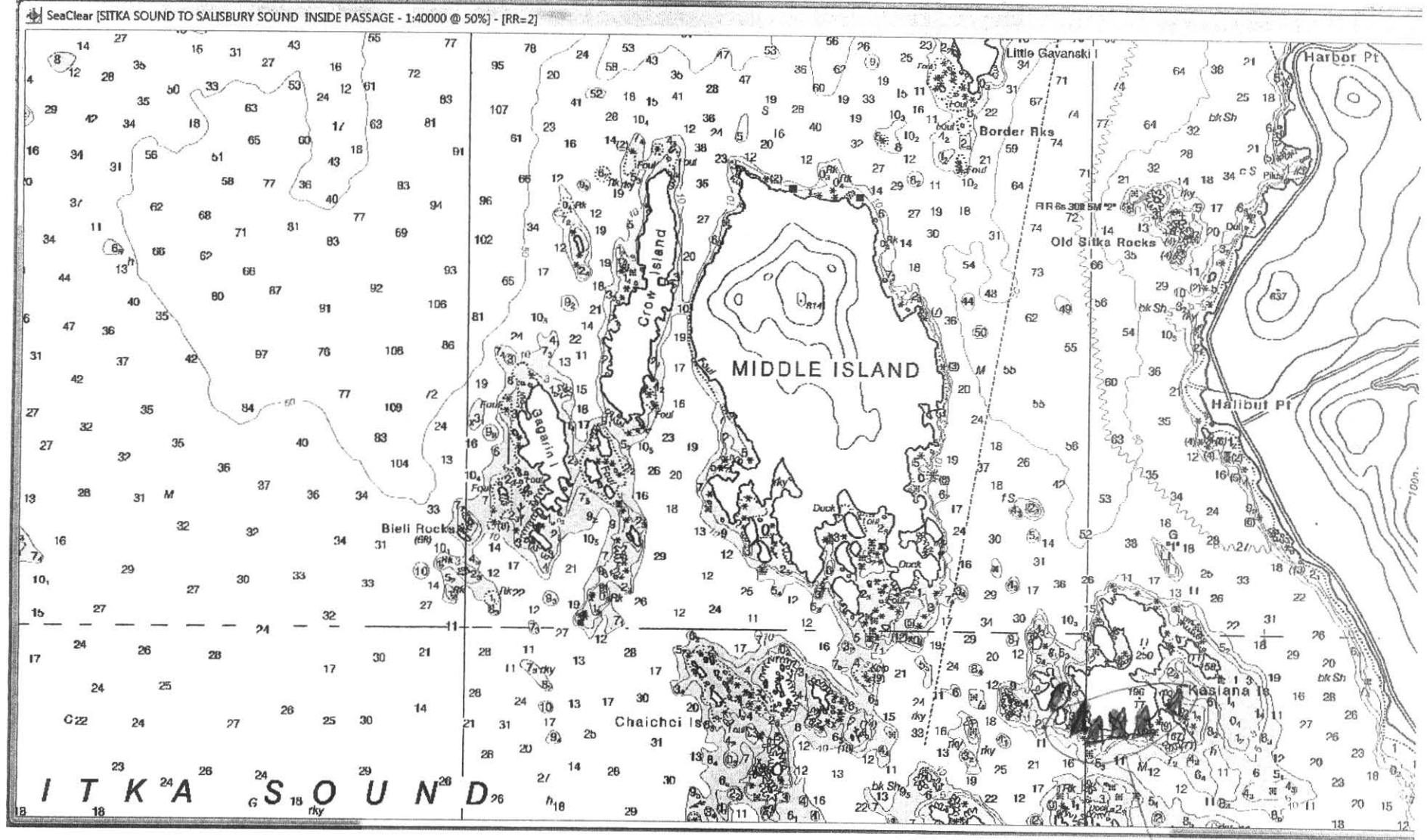
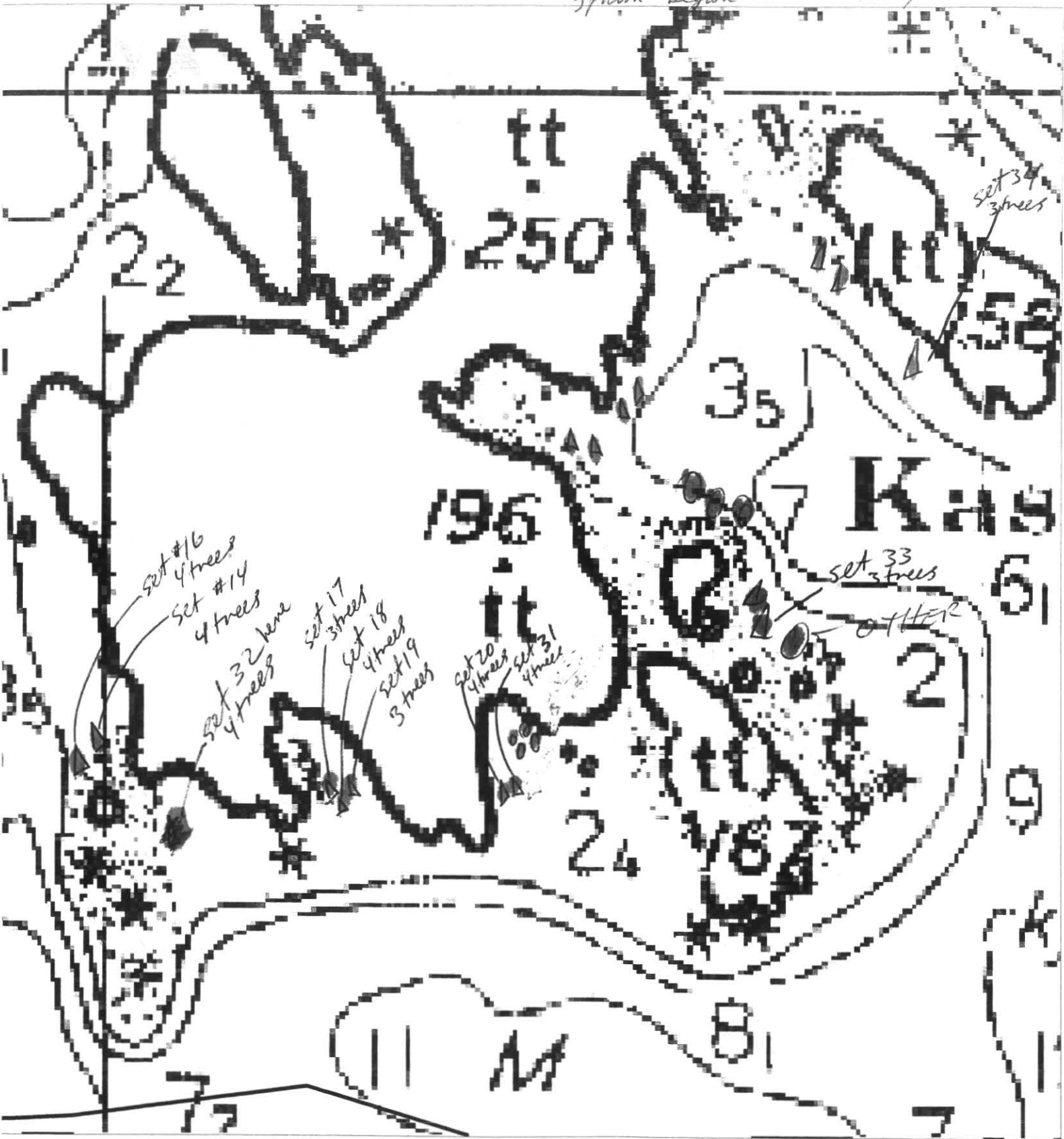


Figure 2. Herring egg branch set locations 2010. Sets made by SHCA ; and other sets designated by of unknown origin.

Record area, date of branch set, and date retrieved. It is important to have as much information as possible about the placement and harvest of herring eggs.

10 sets - 36 trees

4/4/10 South sides Kasiana Is.
spawn began set 33 today



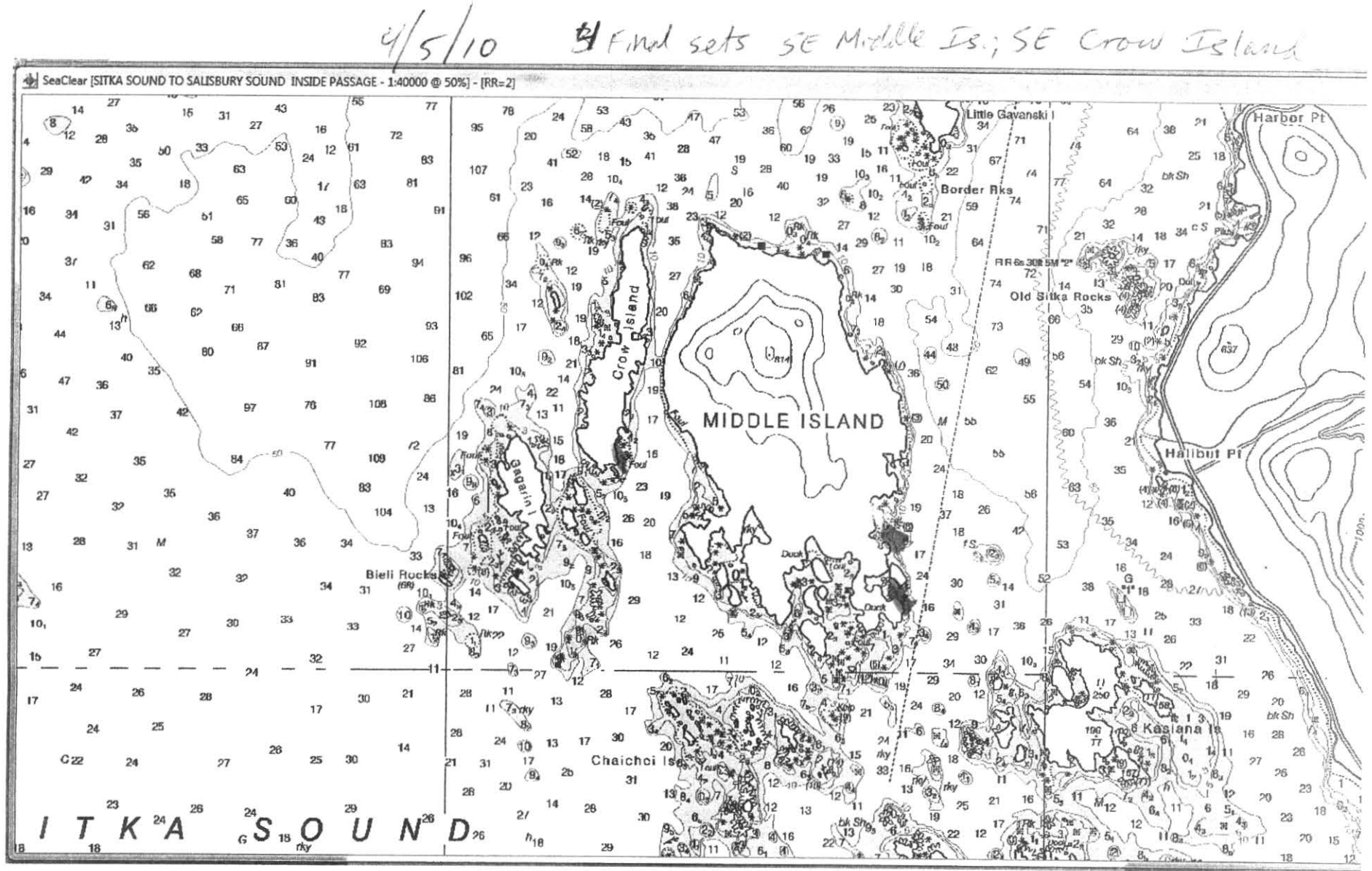


Figure 2. Herring egg branch set locations 2010. Sets made by SHCA \triangle ; and other sets designated by \circ of unknown origin.

Record area, date of branch set, and date retrieved. It is important to have as much information as possible about the placement and harvest of herring eggs.

4/5/10

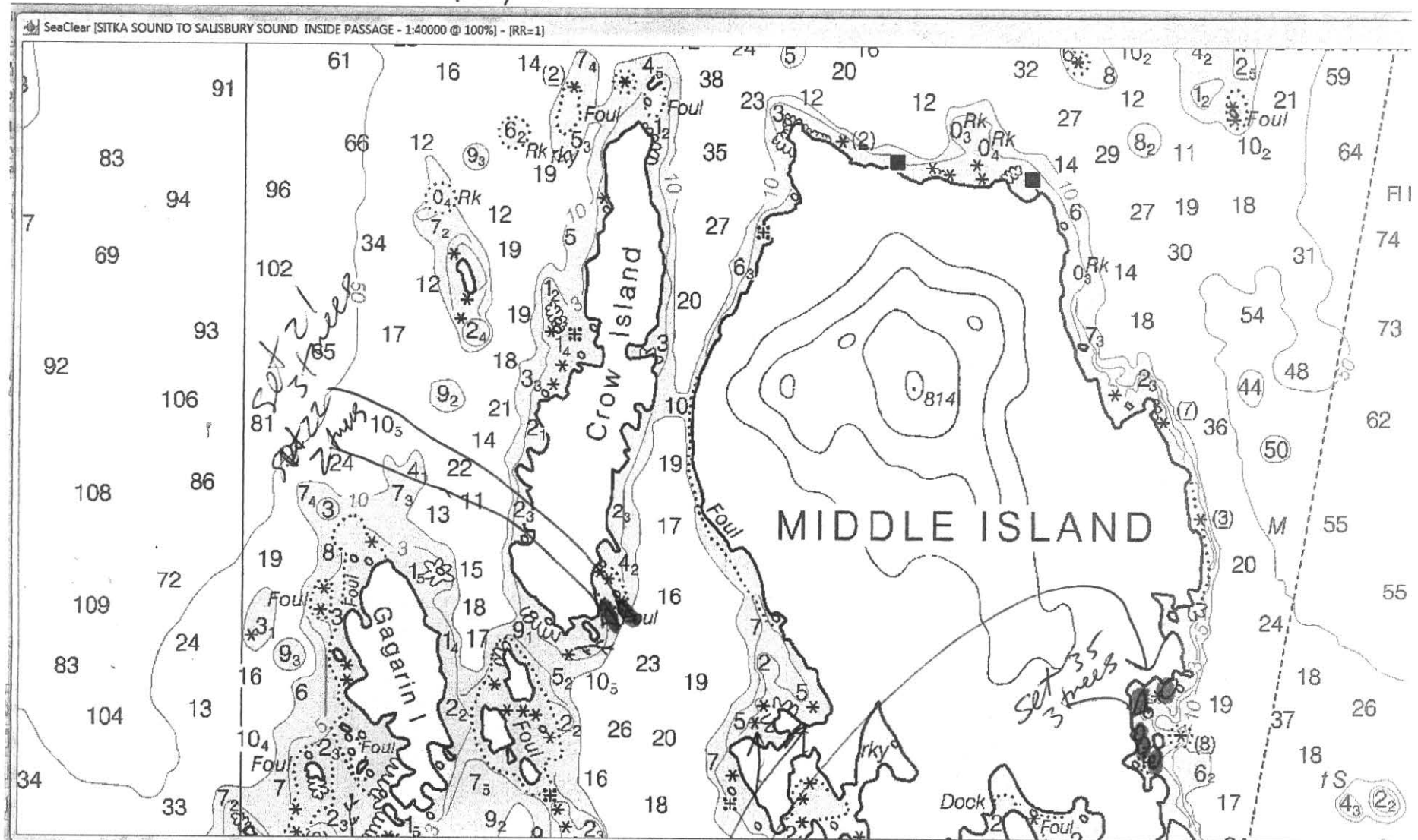
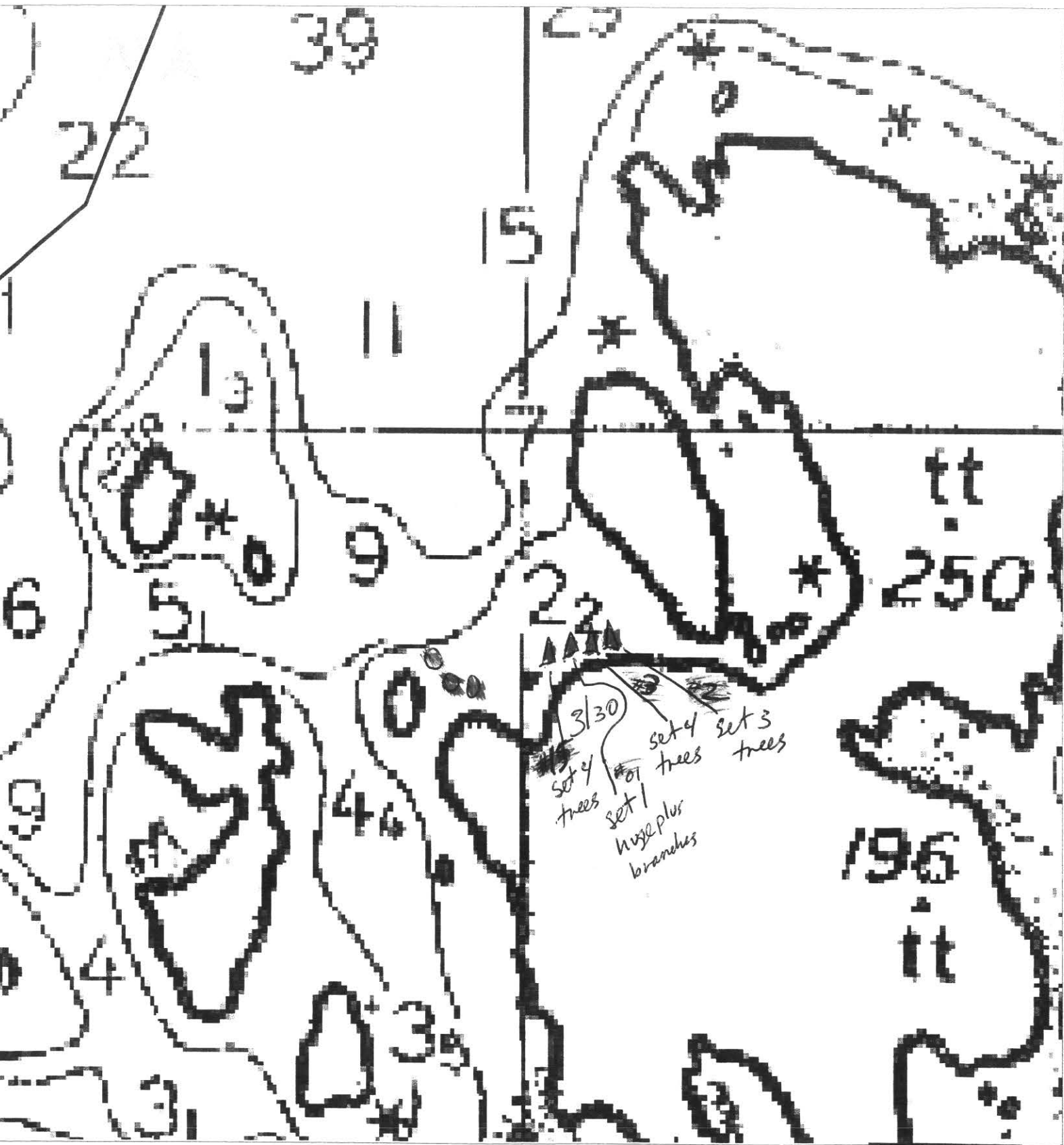


Figure 4.

Spawn began today

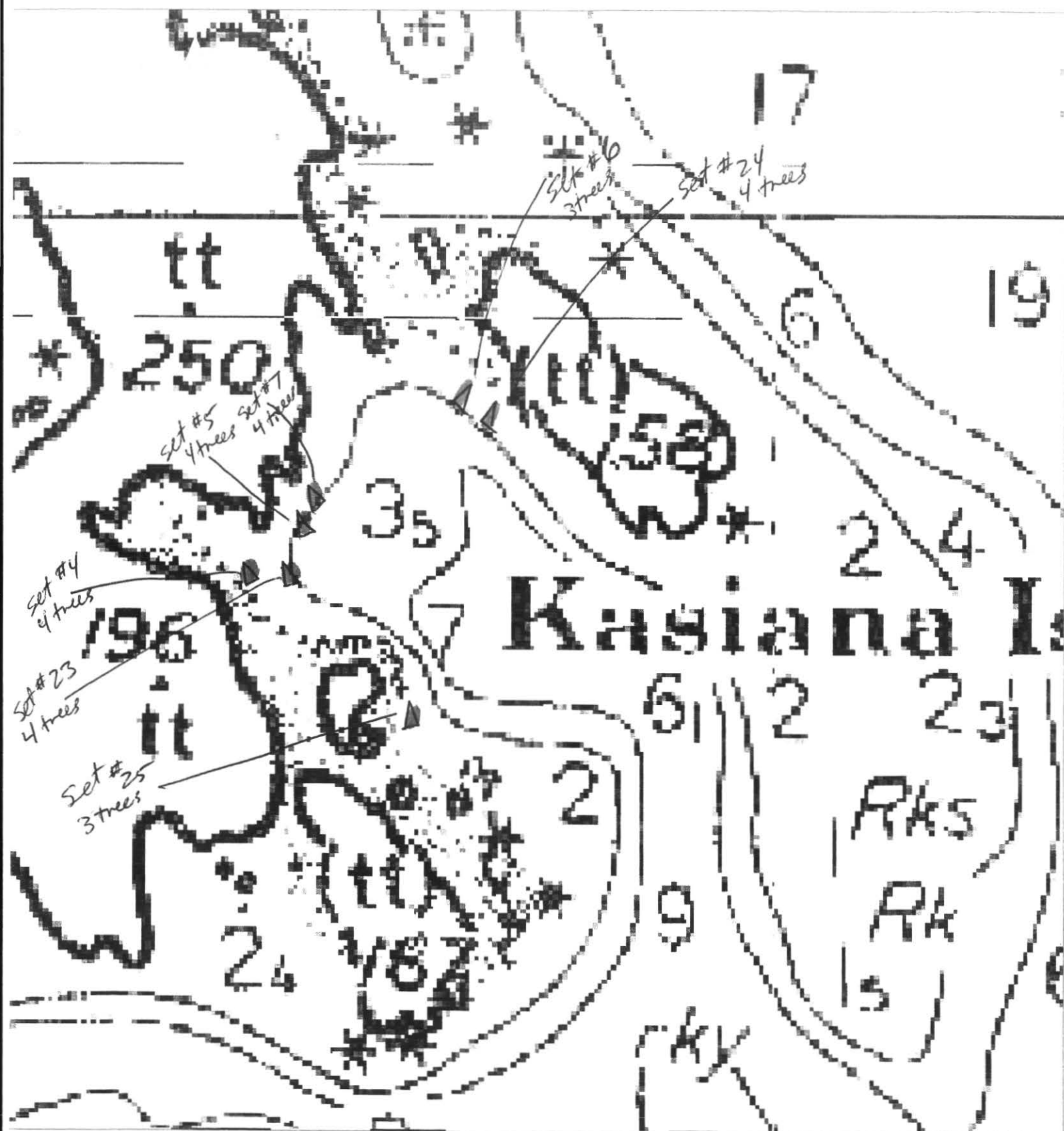
NW Kasiana IS

3/30/10



3/31/10

Southwest Cove Kasiana Island



Herring egg on branches weights

HCA Herring Eggs on Branches

Julia Kal

Date of Branch Set	Date of Branch Retrieval	Location	Weight	Comments	GPS Names
3/30	4/10	N. Kasiana Is.	2,828	set #1	2 Trees
3/30	4/10	"	4,190	set #2	3 Trees
3/30	4/11	"	2,276	set #3	4 Trees
3/30	4/11	"	2,786	set #15	4 Trees
			= 12,080		
3/31	4/7	S. Kasiana Is.	1,500	set #25	3 Trees
3/31	4/7	"	2,215	set #4	4 Trees
3/31	4/7	"	2,045	set #23	4 Trees
3/31	4/7	"	1,260	set #5	3 Trees
3/31	4/9	"	4,338	set #24	4 Trees
3/31	4/9	"	2,132	set #6	3 Trees
3/31	4/7	"	2,215	set #7	4 Trees
			= 15,703		
4/1	4/12	SW Middle Is.	~1,849	set #8	2 Trees
4/1	4/12	"	~775	set #9	3 Trees
4/1	4/12	"	360	set #26	3 Trees
4/1	4/12	"	~1,920	set #27	3 Trees
4/1	4/12	West Middle Is.	382	set #28	3 Trees
4/1	4/12	"	~2,242	set #29	3 Trees
4/1	4/12	"	~2,589	set #30	4 Trees
			= 10,117		
4/3	4/11	Road between H.P. & HPM	light	set #10	3 Trees
4/3	4/11	"	spawn	set #11	3 Trees
4/3	4/11	"	no	set #12	3 Trees
4/3	4/11	"	retrieval	set #13	2 Trees

1 Tree robbed clean to the bolt

LOST 2 TREES BROD LINE RETREIVING

Julia Kae

1 Tree robbed clear
to bole

Public Comment #124

END OF DAY, DECK CLEAN UP

END OF DAY, DECK CLEAN UP

Herring Egg Form 2009

traci C

Observation: 4/16 & 17
no egg delivery

Newspaper photographs pertaining to spawn and herring eggs



Sharing the Bounty

Crew of the seiner Julia Kae, center, pose as Sitkans help themselves to hemlock branches loaded with herring eggs on the deck of the boat at Eliason Harbor this morning. The crew collected some of the branches they set on the Kasiana Islands and will give them away until 6 p.m. tonight. The crew will be giving away eggs every day through

Sunday at the base of the ramp at Eliason Harbor. This is the third year skipper Steve Demmert has organized the goodwill effort to give eggs to the community for free. Many of those pictured getting eggs are sending them to relatives in villages. Crew pictured are, from left, Demmert, Kevin Richey and Henry Larsen. (Sentinel Photo by James Poulson)



PHOTOS BY BETH COMSTOCK

Eighty Wrangellites met the *F/V Julia Kae* as it arrived with a load of herring eggs from Sitka.

Herring egg feast arrives in harbor

The *F/V Julia Kae* brought nearly four tons of herring eggs to Wrangell last Friday. It was the first such load of eggs that Wrangellites have seen in over two decades.

More than eighty people were able to collect eggs for themselves and many more eggs were delivered to elders in the community who were unable to meet the boat.

The bounty was made available through the efforts of Steve Reifentuhl, Executive Director of Southeast Herring

Conservation Alliance, skipper, Steve Demmert, and crew of the *Julia Kae*, and the Wrangell Traditional Foods Board.

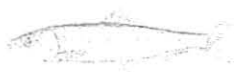
Wrangellites showed their gratitude in the traditional manner, bringing a variety of goodies to the skipper and crew as they came aboard the *Julia Kae* to collect their share of the bounty.

James Stough Sr., right, holds up a branch that is heavily laden with herring eggs.



Subsistence harvest survey data

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. Box 61
Sitka, Alaska 99835

Tel. No. 907-738-3509

Date

Dock Location Eliason Harbor

5:30	Observation Date	Boat type if known	Container type	Full/Half/other	Name of Harvester if known	Comments
	6:10		garbage bag	half		
1/1		skiff / boat whaler	boatload	200 lbs		seen
			boatload	unknown		by
			boatload	unknown		Steve
1/6			boatload	1200 lbs		seen by
			boatload	1200 lbs		Steve
1/9	1:00	whaler	boatload	1000 lbs		picture
		42 ft	deckload	full		pictures
			boatload			pictures
	3:15	whaler	boatload	4500 lbs		
2/10	3:10	42 ft	deckload	full		
		whaler	boatload	1000 lbs		
			boatload	200 lbs		Seen by Henry
		whaler	boatload	300 lbs		
1/10	6:45	whaler	boatload	1000 lbs		
	6:45	22 ft aluminum w/ cabin	boatload	1000 lbs		m

Other observations:

Saw Todd Nevins at his house taking a small boatload out of his whaler

4:10	observation Date	Boat type	Container type	Full/half/other	name of harvester	comments
4:10						S.T.A. boat here but Julia Kae said they didn't think they looked like they had gotten any w eggs
4:10		alum-num 56 ft w/cabin	boatload	unknown		
4:00						
4:00		42 ft	deckload	2000?		aw a truck leaving the dock full of ^{large} fish boxes marked "S.T.A." when I arrived
6:00						

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. Box 61
Sitka, Alaska 99835

Tel. No. 907-738-3509

Date

Dock Location Sealing Cove Harbor

Observation Date	Boat type if known	Container type	Full/Half/other	Name of Harvester if known	Comments
4:30					
5:20					
2:20		two 5 gal bucket	full		30 lb
3:05	20-25 ft. Boston Whaler	boatload	covered by tarp, half way		500 lb
4:00					
4:20					
4:45	small 13-15 ft Boston whaler	boatload	full		500 lb
5:00		5 gal bucket	half		20 lb
5:35		boatload	8 fish boxes		400 lb
5:55		boatload	15-20 gal tub - full garbage bag - full grain bag - full		120 30 } 160 lb
6:00					
2:05		2 garbage bags - full 2 5 gal buckets (gallon) - full			30 lbs
2:30		15-20 gal tub - full			same people 120 lbs
3:00		fish boxes - full			200 lbs
4:05					

Other observations:

Tel. No. 907-738-3509

Dock Location ANB Harbor

Observation Date	Boat type if known	Container type	Full/Half/other	Name of Harvester if known	Comments
2:30 -1 4:25	4:15	2 or 3 Ziploc bags small	full		
12:10 1					
10:50 -2:00 1					
3:17					
5:20 -1 6:20					

.....

SeaClear [SITKA SOUND TO SALISBURY SOUND INSIDE PASSAGE - 1:40000 @ 32%] - [RR=2]

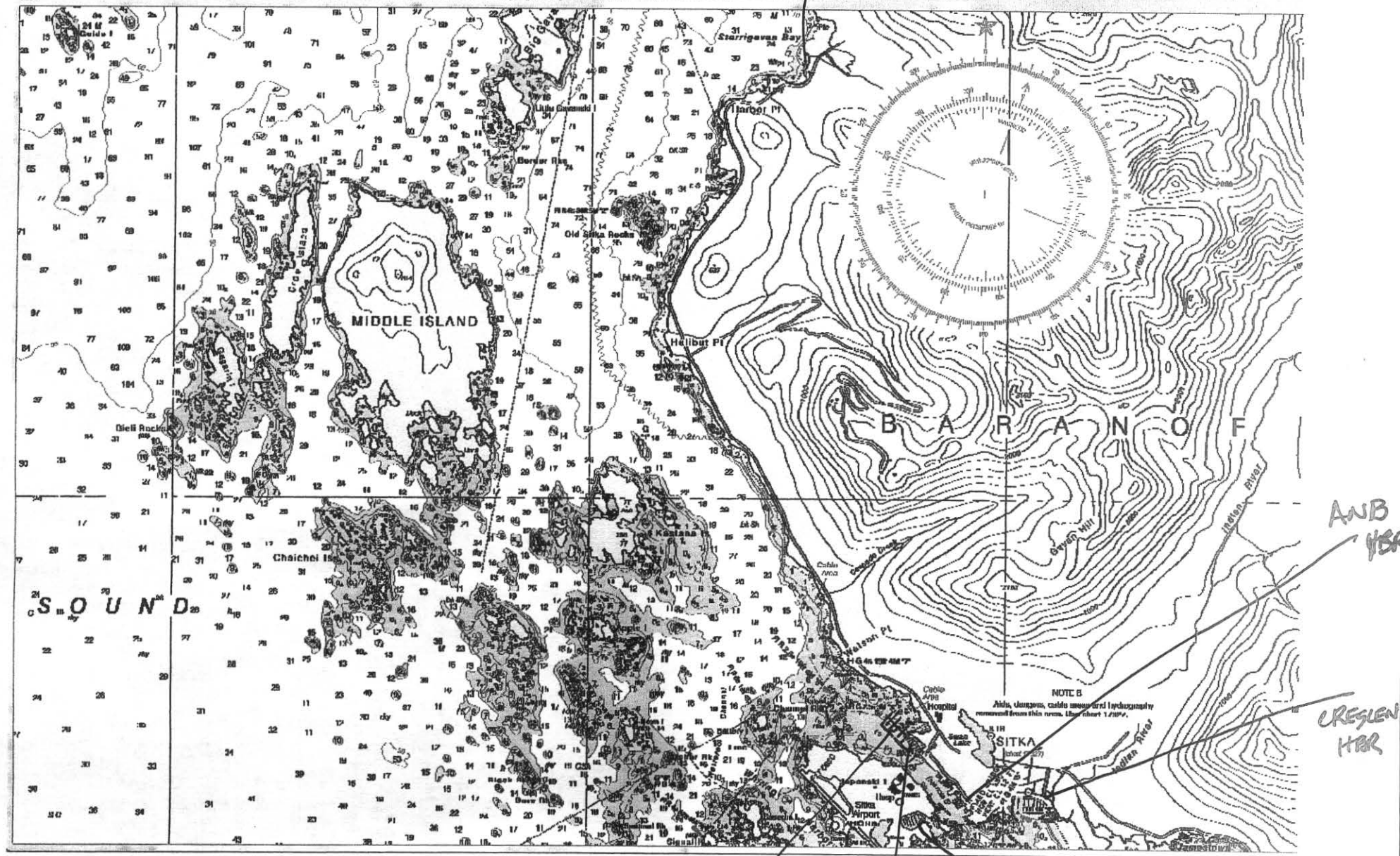


Figure 5. Sitka shoreline Starrigavan to Sitka Harbor

Sitka Herring Group
410 Calhoun Ave
Juneau, AK 99801
(907)723-8267

2-08-12

Alaska Board of Fisheries
c/o ADFG, Boards Support Section
PO Box 115826
Juneau, AK 99811

RE: SE Finfish Meeting

Dear Board of Fisheries Members:

The Sitka Herring Group is a dues paying group of 23 members (45%) of the Sitka Sac Roe permit holders. There are at least a dozen other affiliated permit holders with our cause who for whatever reason are not current with their financial support. Our group formed for one reason and one reason only and that is convince you to take us into modern 21st century herring management.

The Sitka Herring Group Supports Proposals 233 and 234.

It is time to change the Sitka Sac Roe fishery into an equal harvest share (EHS) fishery. While this has been discussed at the last 3 Board of Fisheries cycles the Board only has recently had the authority to change the fishery. The Attorney General's opinion at the Sitka meeting in the 2009 cycle was that **the Board does have the authority to change a fishery to EHS.** This is not the same as a coop. Each boat gets a separate and equal GHL, catches the fish and sells to their own processor. Or pools within a processor. But this is not a Chignik Co-op style change where the quota is pooled into one entity! Indeed you will find proposal 227 is a reminder of the stipulation that any herring purse seine herring conducted in the Ketchikan districts will be EHS by board directive in 2006.

There will be a 2012 EHS fishery in the West Behm Canal fishery, or there will be no fishery at all. This has already been Alaska Board of Fisheries policy for new and emerging herring purse seine fisheries. This would be a good opportunity to see how it's going to work while the Board directs the department to get busy and prepare a 2013 management plan for Equal Harvest Shares in the Sitka Sac Roe fishery.

The dispersal and timing of an EHS fishery will assist in making the time and space available to co-exist more neighborly with the local subsistence users in Sitka Sound. The precision with which the department could manage would also enable the fleet to be moved on and off areas that will lead to a much more equal dispersal of the spawn, which could help subsistence users have a better opportunity to harvest even with a large seine harvest occurring.

The lack safety of the boats and people involved in the fishery has become a running joke across Alaska. If there ever was a fishery that needed to be 'conserved and developed' in order to promote future access and management of the fishery, this is it. The 2nd opener in 2011 cost more in lost gear, fixed boats and lawsuits than the entire opener was worth. This is increasingly the case. Is it going to take a collision with a death or major injury to one of the participants to make the state of Alaska

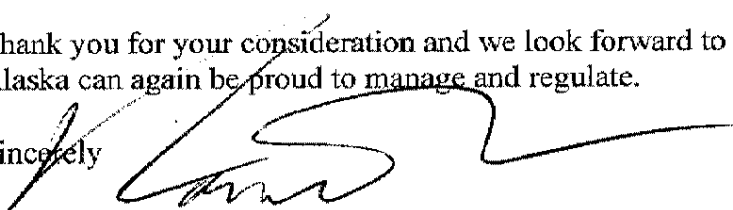
respond with an appropriate management regime like EHS for this Sitka fishery. This is not a fishery but a crash 'em up derby. Why insurance rates have not caught up with this fishery is anyone's guess?

The quality of the product and value of the fishery will be enormously advanced and enhanced with an EHS fishery. Markets and processors would know how much product they are buying in advance of the fishery, allowing them to make better market decisions. There have been companies who were concerned as they were located too far from Sitka to capitalize on these massive improvements that the EHS fishery would enable. But just because something is right to take action doesn't mean that we should delay this action due to processor location issues. Certainly all processors could get equipment over to the fishery to take advantage of a several week, steady productive fishery. The consideration of the fishery has never been a tail wagging exercise. The participants will adapt their behavior to the fishery if it is the right fishery for the resource and for the majority of participants and processors.

The majority of the fleet is in favor of the EHS fishery. This has a long history in Sitka Sac Roe. The fleet has looked at this and the vast majority of the fleet has been requesting this change in management since 2003's Board of Fisheries cycle. Unlike some other recent requests for changes to established fisheries that had a narrow base of support by a few individuals, EHS in the Sitka fishery has always enjoyed robust support which we believe to be near the 80% mark at this point in time.

Thank you for your consideration and we look forward to changing this fishery into something that Alaska can again be proud to manage and regulate.

Sincerely



Bob Thorstenson, Jr.
Sitka Herring Group



Sitka ♦ Craig ♦ Valdez

208 Lake St. Suite 2E Sitka, Alaska 99835

Phone: 907.966.3110 Fax: 907.966.3115

February 9, 2012

BOARD OF FISHERIES

February 24 – March 4, 2012

RE: Opposition to Proposals 230, 231, 232, 238, 239 and 242

Dear Chairman Johnstone and Board of Fish Members:

Silver Bay Seafoods, LLC (SBS) is a predominantly fisherman owned, Alaska seafood processing company. We operate three state of the art processing facilities in Alaska, with the flagship plant being located in Sitka, Alaska. Similarly, our corporate offices are likewise located in Sitka, Alaska.

In five short years, commencing in 2007, SBS has grown from a passionate, but unrealized vision of Alaskan fishermen to becoming a major participant in the Alaska seafood processing industry. The Sitka Sound Herring Sac Roe fishery has been an integral part of our business plan over the last five years, and the substantial investments we have made in the fishery and the Sitka facility have been made strategically. In other words, realizing that the analytical data supports that the Department has managed the Sitka Sound Herring Sac Roe Fishery based on good science and sustained yield principles and furthermore that the general consensus in the scientific community, including the Auke Bay lab, University of Alaska, and ADF&G, is that the herring biomass is increasing and the stock is healthy, SBS committed to a long term investment in a well-managed, healthy resource.

In 2007, after our first year of salmon operations in Sitka, SBS made the bold but strategic decision to allocate the majority of our 2007 salmon earnings towards a \$1.7M capital expenditure specifically and exclusively for the Sitka Sound Herring Sac Roe Fishery. What resulted was a state of the art, high volume process, that in its first year of operation (2008) resulted in more herring being processed in Sitka specifically, and Alaska more generally, than had ever been processed previously. Each year since that initial investment, SBS has continued to allocate capital dollars towards improving and expanding our Sitka process and accordingly the volume of herring processed locally. To date, we have allocated **\$3.42M** towards our herring infrastructure since our inception. This is a substantial, long term investment in a healthy and growing resource.

This capital investment alone has resulted in direct job creation and retention by SBS, but has also been an economic stimulus to many local contractors and suppliers engaged in our projects. Similarly, but to an even larger degree, our herring operations have promoted the same benefit both to SBS, our local business partners, and the overall economy of Sitka.

- **SBS Herring Operations Job Creation:** Each year since 2008, SBS has increased the number of employees allocated specifically to herring operations. In 2008 it was just over 100 employees and since that time it has increased each and every year with 2012 being targeted for 190 employees. For the period 2008-2011, SBS's herring operations have resulted in cumulative gross wage earnings of over \$2M by SBS employees.

- **SBS Herring Operations Job Retention:** The Sitka Sound Herring Sac Roe Fishery has played a critical role in our Company's ability to both attract and retain employees. For SBS, the fishery is second only to salmon in terms of gross revenue and volume. Herring affords SBS the opportunity to retain full time employees at every level of the organization, that otherwise could not be justified. This is a benefit not only to SBS, but also to the community of Sitka as well because these employees call Sitka home, rather than simply their seasonal place of employment.
- **SBS Herring Operations - Economic Engine:** There is no disputing that the fishery as whole is a substantial economic stimulus for the community of Sitka. SBS's local presence and size of operations greatly enhances the size of that engine on a local level. We are fortunate to have our operations supported directly by many local businesses that have been able to thrive as a result of our growth in operations, to the point that some of our non-Alaskan business partners move employees to Sitka to represent their role in the operations. Likewise, the indirect economic benefits have also been enhanced over the last five years; a period in which this added economic stimulus has been desperately needed to provide a positive offset to other elements of the Sitka economy that have seen declines resulting in reduction of many funding streams, such as sales tax, that support local government. The one local revenue stream that has seen continued positive growth since our tenure began is raw fish tax.

The economic engine we have created in Sitka through our investment in the fishery has also played a role in our ability expand to other Alaskan communities, specifically Craig and Valdez. Without the economic contribution that herring provides to SBS, SBS arguably may not have been able to achieve the full reach of our growth into other Alaskan communities, and thereby both the job creation and economic stimulus we have established in those communities.

Each of the aforementioned proposals up for consideration (230, 231, 232, 238, 239 and 242) seeks to place unwarranted restrictions and/or burden upon the Sitka Sound Herring Sac Roe Fishery. Consistent with the constitutional mandate, Alaska fisheries are managed by ADF&G and the Board of Fisheries according to sustained yield principles. This includes management of the Sitka Sound Herring Sac Roe Fishery. As such, based on the analytical data, the consensus in the scientific community supporting the science used to date, and the evidence supporting ADF&G's current management methodologies being based on sustained yield principles, I am opposed to each of these proposals as they seek to restrict the Sitka Sound Herring Sac Roe Fishery in direct conflict with the constitutional mandate. Silver Bay Seafoods, and many others in the industry, have made a substantial, long term investment in the Sitka Sound Herring Sac Roe Fishery based on the fact that the current methodologies are well managed and based on sustained yield principles of a healthy fishery.

Sincerely,



Richard A. Riggs CEO

Silver Bay Seafoods
208 Lake St., STE E
Sitka, AK 99835
Ph. (907) 966-3110
Cell (907) 738-7271
E-mail: richard.riggs@silverbayseafoods.com

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

December 2, 2011

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

RE: Sitka Tribe of Alaska's Opposition to Board of Fish Proposal 273

Dear Board of Fish,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government for over 4,100 tribal citizens located in Sitka, Alaska. As a tribal government, STA is responsible for health, welfare, safety and culture of its citizens. STA would like to go on record as vehemently opposing Board of Fish (BoF) Proposal 273. STA firmly believes that this proposal is unwarranted, discriminatory, wasteful, and cost prohibitive for the State to enforce.

The Amount Necessary for Subsistence (ANS) originally set by the BoF was 105,000 - 185,000 pounds. At the 2009 BoF meeting the ANS was adjusted to 136,000 - 227,000 pounds. Since 2002 STA has been working with the Alaska Department of Fish and Game's (ADF&G) Division of Subsistence (DOS) to monitor harvest trends and to track if subsistence needs were being met by collecting subsistence herring egg harvester data through a combination of western science and Traditional Ecological Knowledge (TEK). The newly released report by DOS for 2002-2010 (*The Subsistence Harvest of Herring Spawn in Sitka, Alaska 2002-2010 - Technical Paper NO. 343*) shows there were some years when subsistence needs were met and other years when they were not met (2005, 2007 and 2008).

In 2010 STA and DOS staff refined data collection methods to increase the ability of the survey results to stand up to intense peer review scrutiny. This revised methodology will allow staff to track additional parameters that can corroborate harvesters' survey comments. Since this survey methodology has been approved by and meets the requirements of ADF&G DOS this proposal is unnecessary.

The proposer's comment that subsistence permits are not necessary or required in most subsistence areas is correct. In instances where subsistence permits are required it is for the purpose of protecting the resource and not the commercial access to that resource. In a few subsistence fisheries harvesters are required to report their harvest amounts, but STA knows of no subsistence fishery that requires harvesters to have their harvest directly verified by management officials. With these points in mind this proposal would require herring egg

harvesters to meet restrictions not required by other subsistence fish and game harvesters and could be considered discriminatory

The mandatory weighing provision of this proposal would create additional hardship for the harvesters and decrease the quality of the harvest. Since the majority of the subsistence harvest takes place in a short period of time there would likely be a back log of harvesters waiting to have their harvest weighed and off loaded. This delay will prevent the harvesters from harvesting and processing their eggs in a timely manner which will reduce the quality of harvest. Also, subsistence harvesters from other communities would be required to off load their boats for weighing and then have to reload them for the return trip home. This additional handling would cause egg clusters to fragment, fall off the branches and become unusable.

The mandatory weighing of eggs would also be a costly logistical nightmare for ADF&G. The proposal states that subsistence eggs would be weighed at 6 docks within the Sitka area. This would require ADF&G to come up with staff and the infrastructure to weigh up to 235,000 pounds of herring eggs on branches at these sites. Ultimately, the proposal would require the Board to allocate funding (which is outside the Board's authority) to meet the proposed requirements. In previous years, the proposer has indicated that his organization (Southeast Herring Access Alliance, aka the Sitka Herring Conservation Alliance) would provide the funding and boats to weigh subsistence herring eggs, but wisely ADF&G declined. To accept funding or logistical support from the industry to regulate another user group would be putting the proverbial "fox in charge of the hen house" and would ultimately lead to litigation against the State.

If you have any questions regarding this letter or STA stance on this proposal please contact STA's Resource Protection Director, Jeff Feldpausch at (907)747-7469 or email

Sincerely,



Lawrence Widmark
Tribal Council Chairman

Cc: Tad Fujioka, ADF&G Sitka Advisory Committee

Sitka Tribe of Alaska
Petition Opposing Board of Fish Proposal 273

We, the undersigned, are opposed to the Board of Fish proposal 273. This proposal would be unnecessary, discriminates against subsistence users, would inhibit subsistence needs from being met and would be excessively expensive for the State to enforce. We respectfully request that the Board vote in opposition to this proposal.

Name

Address

Nancy M. M. M.

POB 6142 Sitka, AK 99835

Allen Bradley

1702 HPR #6 Sit, AK 998

Kendall Jankin

POB 2003 Sitka, AK 99835

Diana R. R.

111 Monastery Street

Veronica Rediger

1701 HPR #8 C. Sitka, AK 99835

Edward R. R.

1112 Edgemoor Dr. Sitka, AK 99835

Priscilla P. P.

1112 Edgemoor Dr Sitka, AK 99835

Doug R. R.

803#2 H.P.R.

Sitka Tribe of Alaska
Petition Opposing Board of Fish Proposal 273

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Name

Address

Katherine Blacksmith

2716 HPR #11

Heather Rigg

1408 A. Alder Way

Avert Boan

115 New Archangel St

Jonathan Feldhausen

800 Sistrud St.

Raymond W. Hornum

1022 Randolph Walton Cir.

Archie W. McCann

P.O. Box 1595 Sitka, AK 99835

Bill & Bertie Shaugen

P.O. Box 1595 Sitka Alaska

Jeff Bolderson

800 Sistrud, Sitka, AK 99835

Veronica Chalk

Box 2246 SITKA AK 99835

Lihon Lestebof

Box 2246 SITKA AK 99835

Sitka Tribe of Alaska
Petition Opposing Board of Fish Proposal 273

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Name

Address

Cammie Ferguson

3880 H.P.R. Sitka

Arline Campbell

PO Box 6312 Sitka

Lillian McDonald

800 Seward St Sitka AK

Sabrina Smith

2020 H.P.R. Sitka

February 9, 2012

Dear Board of Fish Members:

This letter has been sent in regards to certain proposals that have been submitted and will be addressed at the Board of Fish meetings in Ketchikan later this month. Nearly all proposals addressed in this letter pertain to the Sitka Sound herring sac roe fishery. Myself, I address you as a current holder of one of these permits, one which has been in our family since the fishery's inception. On behalf of my family, this letter comes addressed from at least ten of us that are Sealaska Corporation members and Tlingit & Haida members, and all of whom directly benefit in some way from this fishery and the time and season to harvest eggs or the herring themselves.

Proposal 227 - Amend to clarify only the purse seine fishery as an equal quota share fishery:

Supported, with recommendations of clarifying that this be an equal share for purse seine permit holders, as opposed to gillnet permit holders.

Proposal 230 - Revisions for the commercial herring fishery management plan for Sitka Sound:

Opposed. Much of what is being proposed here are guidelines that are undefined and would for them to be enforced would appear to provide irregularity to a model used by the ADF&G. For example, part one of this proposal suggests that stocks of herring be identified on a spawning area basis. The ASA model used by the ADF&G already includes factors in its modeling. Other factors such as depth of spawn and roe concentrations are not mentioned in part one of this proposal. Other factors that may be unfamiliar to me, but it is the vagueness of this particular part of this proposal.

Part 3 of this proposal recommends an assessment of the abundance of mature herring for each stock before allowing fishing to occur. Again, it is unclear what is being proposed here. From what I understand the ADF&G accomplishes this already with their test fisheries and sampling.

Proposal 231 - recommending a fishery closure when the fishery has harvested within 10% of the quota:

Oppose. It has come to my attention that an overview of the last ten years will show that the fishery has been 2% under the harvest quota. Establishing a regulation as such appears again to undermine the ADF&G's ability to manage a fishery that appears to be managed well given a changing quota that changes year to year.

Proposal 232: Repeal regulations for establishing the herring fishery GHL, and implement a harvest rate percentage determined by the formula: harvest rate percentage = $2+8(\text{spawning biomass(in tons)}/25,000)$:

Oppose. My first wonder with such a proposal is the science to support such a repeal. Having no science to back such a proposal implies that the ASA model currently used is flawed. Much of my understanding of how the ADF&G conducts their surveys from the air, by boat with sonar, their use of transects, and diving, appears to be regimented in a way that collects effective and credible data already. Though I am still unfamiliar with the details of how all data is collected and factored into the current ASA model, I view it as a model that continues to prove itself as herring populations appear to return healthy to the Sound.

Proposal 238 & 239: the areas of Makhnati to Gavanski to Crow Island to Halibut Pt. along town shore to breakwater is to be reserved solely for subsistence use only:

Oppose. In recent years the ADF&G has taken measures to accommodate local concerns by refraining from holding commercial harvests in this "Core Area". Fisheries have obviously taken place in these areas much less in recent history than prior to those years. Though there are concerns of inconsistent spawn in this area, thus the case to exclude the commercial aspect, end of season spawn data shows that spawn takes place in this area every year. My assumption as to the reason for concern of the inconsistent spawn in this area may simply be the inconsistency of the timing of spawn. In other words, spawning in the core area happens every year, but never at the same time.

Realizing fully that locals and visitors come to Sitka for the purpose of harvesting eggs (usually with branches), the timing of making reservations and plans can never be fully dependable because the herring ultimately spawn where they will. Once branches are set, relocating them is understandably not so easily done and may remain in place for that reason. Factors of costs associated with this inconvenience of having to wait or even relocate branches to further areas outside of the Core Area is also an inconvenience. That said, commercial fisheries rarely take place in the same areas every year as well, and abide by the same consistent change of fish movements. It is my concern that it is not the commercial fishery that is the cause for concern, but normal economic and natural factors: increase in fuel prices, plane ticket prices to get to Sitka, time off from work to harvest, and natural factors of the herring spawning where and when they ultimately do.

Proposal 242 - increase the biomass threshold to hold a fishery from 6,000 tons to 15,000 tons.

Oppose. Again, such proposals only undermine the models used by the ADF&G and provide no reason for doing so.

Proposal 243-244: eliminate a rotational sac roe fishery in West Behm Canal for gillnet purposes only, and exclude any purse seine fishery.

Oppose. This proposal lacks any scientific reason for doing so, and rather is aimed solely at benefiting gillnet fisherman over purse seine fisherman.

Proposal 245 - allow 1-E and 1-F equal share permits to be stacked on other boats.

Support. With GHF numbers near 1,200 tons in 2011, a “one boat per permit” fishery is uneconomical once considered under 5 AAC 27.197 (a)(2), which allows for an equal split fishery. A fishery under these conditions would be costly for a harvest of just roughly 25 tons per boat.

Proposal 273 - Require a permit for subsistence herring egg harvests on branches in Sitka Sound. Establish a monitoring program to obtain official weights eggs harvested.

Oppose. I do not believe that the locals of Sitka or any visitors coming to harvest need to obtain permits for a tradition that has taken place for generations. I believe their rights would only be infringed by requiring a permit for harvest.

I do believe, however, that there is a need to establish a more reliable measurement of weights that is being harvested on branches. Harvest figures stated by locals in recent years appear to give chance to guessing rather than official weights that could rather be obtained by a weight scale. I’m acknowledging the possibility of overestimations in situations that are left to one’s own eyes. A more credible and reliable number can be established with weigh-ins of branches on land. The egg harvest numbers provided and used to oppose the commercial fishery are the very numbers that are lacking official weigh-ins, thus the importance of the use of scales.

Closing Remarks:

I feel it necessary to submit my thoughts and opinions relating to this fishery as it is a way of life that my family has and still does depend on. My name is Charles Skeek. My family and myself are Alaskan Native and our family has been involved with the Sitka Sound Sac Roe fishery before its beginning, starting with my father, Leonard Skeek. Up until just a few years ago, the permit was handed down to me. My father still benefits financially from this fishery and as suggested earlier, it is very much still a family tradition of ours to participate in this fishery. Up until around the year 2000, it was customary of my father to use his own boat, the F/V Keku Connie, to remain in Sitka following the commercial fishery in order to harvest eggs on branches. His subsistence harvest was transported by the Keku Connie to bring to his town of birth, Kake, and then continue on to his town of residence, Petersburg. My recollection of these days saw a large number of locals in Kake converging to the docks to meet my father as he freely and selflessly gave to anyone who came for eggs. No compensation for fuel or money was known to be taken by my father. It was simply a gesture of good will and tradition under his own interpretation. It is understandable that tradition becomes restrained

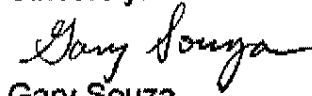
when economic and time factors come into play, but surely my father is a testament to what is required these days for one to harvest.

To: Shannon Stone
ADF&G Boards Support Section
Phone: 907- 465- 6097
Fax: 907-465-6094

The Tongass Sportfishing Association, Chapter 573 of Trout Unlimited would like to submit the following comments on several fin fish proposals that will be considered by the Board of Fisheries during their Feb. 24 thru Mar.4, 2012 meeting in Ketchikan, Alaska.

1. Proposal 248. This proposal would change the definition of " bag limit " for sport fishermen to a " boat limit" for sport fishermen in SE Alaska. TSA is opposed to this proposal as it has the potential to increase the harvest of all fish species in SE Alaska which could force ADF&G to implement additional restrictions on the sport fisheries operating in SE Alaska.
2. Proposal 249.. This proposal would implement annual limits on nonresident anglers for sockeye, coho, chum, and pink salmon in SE Alaska. TSA is opposed to this proposal as ADF&G has not indicated any conservation concerns with these species and implementation of an annual limit on these fish would be unnecessarily restrictive.
3. Proposal 254. This proposal would allow the use of bait by young and disabled anglers while fishing in high use and small cutthroat lakes in SE Alaska. **TSA is strongly opposed** to this proposal as it would result in high mortality of targeted and non targeted fish species in these systems. Currently, there are a number of lakes throughout **SE Alaska** where bait is allowed as well as a "bait use" window for coho salmon from Sept. 15 thru Nov. 15 region wide in a number of systems . TSA feels that this regulation would **negatively** impact rainbow and cutthroat trout populations throughout SE Alaska and **should not** be adopted.
4. Proposal 261. This proposal would increase the sport fish king salmon limit in the Neets Bay area when the king salmon index number is 1.51 or higher. TSA supports this proposal as it would allow additional king salmon harvest opportunities for both residents and nonresident anglers when the abundance of king salmon is high.
5. Proposal 269. This proposal would require all subsistence, personal use, and sport fishermen to fill out a catch report card for all species of fish. TSA is opposed to this proposal as it is an unnecessary requirement. Currently, subsistence, personal use and sport fishers are required to report their harvest on permits (subsistence and personal use), on their license for certain species (nonresident anglers), during creel census interviews and via a sport fish postal survey. TSA feels that this proposal is unnecessary and would add an additional cost to ADF&G.
6. Proposal 337. This proposal would establish a new Herring Cove THA management plan for the commercial, sport, and personal use fisheries that operate in this area. **TSA strongly supports** this proposal as it would put in regulation what ADF&G has been doing by EO over the past several years. This will allow all participants in this fishery to know how and when this fishery will operate each year. In addition, **TSA strongly supports the idea of prohibiting snagging within the THA by all users of this fishery.**

Sincerely:



Gary Souza

Chairman

TSA/Chapter 573 Trout Unlimited

907-617-1271



SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

February 7, 2012

Board Support Section
Attn: Shannon Stone

Alaska Dept. of Fish and Game
P.O. Box 115526
Juneau, AK. 99811-5526
Fax: 907 465-6094

Dear BOF and Boards support,

Do to changing circumstances we respectfully rescind proposal 240.

Thank you for your time and the effort you have put forth.

Sincerely,

Craig Shoemaker
Seafood Producers Coop
507 Katlian St.
Sitka, Alaska 99835



SEAFOOD PRODUCERS COOPERATIVE

PRODUCERS, PROCESSORS & MARKETERS OF PREMIUM QUALITY SEAFOODS

Chairman Johnstone
Board of Fish Members

February 8, 2012

Dear Chairman Johnstone and Board of Fish Members:

Seafood Producers Cooperative has participated in the Sitka Sound Sac Roe fishery for close to 20 years. Processing this resource has provided a source of income for our 88 employees. There are many other resident and non-resident businesses and individuals who have also come to rely on this fishery to sustain their livelihoods.

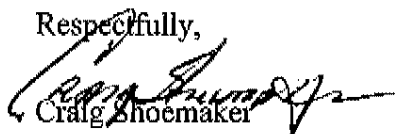
ADF&G has effectively managed the harvest of this resource using a conservative model. They have attempted to conduct the fishery around the areas described in proposals 238 and 239 but should not be restricted in its responsibility to effectively harvest the allowable catch.

Establishing an exclusive non commercial subsistence only area as described in the proposals will limit the Department of Fish and Game's ability to prosecute the fishery and reduce the permit holders harvest potential.

If Proposals 238 and 239 moves forward the harvest area will be reduced, ADF&G's ability to conduct an effective fishery will be more difficult and the risk of harvesting the resource will impact the local economy.

Seafood Producers Cooperative is opposed to proposals 238 & 239.

Respectfully,


Craig Shoemaker

SEAFOOD PRODUCERS COOPERATIVE

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 1
To: BOA	From: Craig Shoemaker	
Co: Support	Co: SPC	
Dept: Section	Phone #: 747-5811	
Fax #: 907-465-6094	Fax #: 747-3206	

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Written Testimony to the Alaska Board of Fisheries concerning: the Joint RPT Industry Consensus of 12/8/2011 regarding the allocation of enhanced fish; and, proposals 315, 331, and 338.

The following testimony was written on behalf of the Southern SE Regional Aquaculture Association (SSRAA) Board of Directors.

John Burke
General Manager
SSRAA
14 Borch Street
Ketchikan AK 99901
(907) 225-9605
johnb@ssraa.org

Written in January 2012

Background:

Southern Southeast Regional Aquaculture Association is a not-for-profit corporation. The SSRAA Board of Directors is comprised of 21 people, 13 of whom are commercial fishermen holding designated gear-group seats. The willingness of SE Alaska fishermen to annually tax themselves 3% of the ex-vessel value to fund SSRAA (and NSRAA) is the fiscal cornerstone of the corporation.

SSRAA derives most of its operating revenue from the cost recovery harvest of summer chum salmon in the Neets Bay Special Harvest Area (SHA). SSRAA is unique among fisheries enhancement associations in that the organization contracts the harvest and custom processing of most of the cost recovery harvest and retains the products for later marketing.

SSRAA operates 3 of its own hatcheries as well as one state facility through contract with the Division of Sport Fish. Summer and fall chum, summer and fall coho, and chinook comprise the primary production at the SSRAA facilities. SSRAA also conducts sockeye rehabilitation projects when those projects are warranted. SSRAA does not produce pink salmon. The Neets Bay program is one of SE Alaska's largest chum projects and also includes the regions largest long-term fall coho project.

SSRAA operates a number of remote release sites (Nakat Inlet, Kendrick Bay, Anita Bay, and Neck Lake) where, depending on the specific site, significant numbers of summer and fall chum, summer and fall coho, and chinook are released. These sites are deliberately situated so that returning fish are primarily harvested in traditional common property fisheries with clean-up

fisheries in the terminal areas. Cost recovery harvest occurs only in Neets Bay and at the Neck Lake raceway in Whale Pass; all of the fish returning to SSRAA sites are intended only for common property harvest. In addition, when escapement has warranted, SSRAA is/has been involved with sockeye restoration work at Hugh Smith and McDonald Lakes.

The fishermen members of the Southern SE Regional Planning Team (RPT) are members of the SSRAA Board. The Southern SE RPT fishermen members comprise half of the fishermen members on the Joint SE RPT. The Joint RPT is tasked by the original SE Alaska Allocation Plan with recommending actions to restore or maintain the agreed balance between the gear groups.

Summary of SSRAA recommendations:

1. Support the SE Joint RPT Industry Consensus Agreement (attached).

Problem: Currently the harvest value of enhanced fish for both the troll and seine fleet is below their agreed allocation percentage ranges while the drift fleet's harvest value of enhanced fish is above the agreed range.

Background: The value ranges are based on the percentage of the total ex-vessel value of enhanced fish annually received by each fleet. In assessing allocation, the value for each fleet in a given year is based on the rolling average of the five most recent years. Though there have been individual annual harvests when the troll fleet was in the agreed range, the problem for the troll fleet is chronic; they have never been in their range across any 5-year period. The troll shortfall is in part due to US/Canada Treaty constraints on fishing time and in part due to the difficulty of producing fish for trollers that are not later cleaned up as they enter more terminal areas by net fisheries. Historically it has been difficult to raise the value to trollers without also lifting the net fleets, at least to some degree. Because of the nature of hook and line fishing, troll fisheries are not generally effective in the "clean up" of a terminal return. This situation has recently changed with several newer fisheries that are starting to push the troll values in the right direction, chum trolling along Homeshore and in Behm Canal adjacent to the Neets Bay SHA. This has turned the historic situation around in that trollers are now able to get some value from fisheries that were once primarily net fisheries.

For a number of years the seiners were above their agreed harvest range, but more recently that has not been the case. There have been a number of reasons the allocation balance between the seine and gillnet fleets has vacillated across time; primarily related to the success, or relative lack of success, of the different large-scale chum releases that primarily benefit one fleet or the other. Specifically, if the NSRAA releases in Hidden Falls do exceptionally well (survival) while DIPAC's releases in Lynn Canal do not do well, the seine fleet may move above the agreed value range. Conversely, in years when the DIPAC releases do well in Lynn Canal and Hidden Falls does not produce at the same survival rate, the drift fleet moves above their agreed harvest range. Recent significantly negative survival issues at

Hidden Falls while concurrent releases from DIPAC programs have had good survival, have pushed the seine fleet below their agreed range while the gill net fleet continues to move upward above their agreed range. While it is never quite this simple, these are the most important factors in the current allocation imbalance.

The “findings” associated with the allocation plan suggest that attempts to correct an imbalance should not alter traditional fisheries. The plan also suggests long and short-term means of adjustment by either adding new production or the management of terminal fisheries in Special Harvest Areas (SHA's) to bring additional harvest to the group(s) below the agreed allocation.

Attempts to restore the allocation balance can be as controversial as any issues facing the SE gear groups. There are a number of proposals before the Board that reflect this controversy. The Joint RPT Industry Consensus removes many of these controversial proposals that sometimes pitted the interest of one gear group against another. The consensus removes only proposals made by those involved in the consensus agreement.

In summary, the SSRAA Board:

- **Consistent with the Joint RPT Industry Consensus, the SSRAA Board supports Proposals: 311, 315, 338, 340 and 344.**
- **Supports Proposal 331, made by SSRAA. If this proposal is not passed, SSRAA supports the alternative actions suggested by the Joint RPT Industry Consensus.**
- **Supports Proposals 334 and 335 as amended by the Joint RPT Industry Consensus (sunset in 2014 as opposed to 2017).**
- **Consistent with the Joint RPT Industry Consensus, the SSRAA Board recommends no action be taken on the following proposals: 295, 308, 323, 324, 332, and 336.**

We have additional comments on three SSRAA proposals included in the Joint RPT Industry Consensus:

The SSRAA Board supports Proposal 315: Management of the summer salmon troll fishery. In Section I-E redefine the area open for trolling and extend the summer closure date from September 20 to September 30 as follows....

The SSRAA Board believes it is important to allow trollers every reasonable opportunity to harvest fall coho produced in SSRAA's programs.

This proposal was submitted by SSRAA and is similar to Proposal 317 by the Alaska Trollers Association. The timing of different fall coho runs across SE Alaska varies a great deal. SSRAA's fall coho stock comes from the Chickamin River, a late-run stock from Behm Canal. The project at Neets Bay is the largest long-term producer of fall coho that are captured in SE Alaska traditional fisheries. The peak of the terminal return, to Neets Bay and adjacent areas in Behm Canal, occurs from mid September through early October.

The coho troll fishery is generally managed as a SE wide fishery related to the abundance of coho across SE Alaska. It is not uncommon for this fishery to close on 20 September. While a 20 September closure may address overall coho abundance and run timing it does not take into account that there are significant specific late runs of fish. The abundance of SSRAA's fall coho in Clarence Strait (District 6 drift fishery) and Behm Canal near Neets Bay is still strong and in fact may just be reaching its peak on 20 September. The drift net fishery in Clarence Strait is often open for parts of several weeks beyond 20 September. The coho harvest in Clarence Strait during this period is often significant, exceeding 20,000 fish. Coded wire tag information suggests almost all of the coho harvested in Clarence Strait during this period are returning from SSRAA's release in Neets Bay. It is not uncommon that a large number of fall coho pass through the drift fishery to Behm Canal where they enter the Neets Bay SHA.

For reasons none of us understand, coho have always gone "off the bite" once they enter the terminal area of Neets Bay, while at the same time troll gear is often very effective in Behm Canal immediately outside Neets Bay. Opening the Neets Bay SHA to troll has never resulted in a significant harvest of these fish.

While all salmon produced in enhancement projects are common property fish, the effort to produce a large number of fall coho is pointed primarily at enhancing troll harvest while understanding there will also be significant benefits to net fisheries from the same fish. Opening the small area of Behm Canal, described in the ADF&G Proposal 316, from 20 September to 30 September would allow trollers access to these fish. This fishery would annually add value to the troll harvest without taking significant value from SSRAA's cost recovery or late-season net rotations in the Neets Bay SHA.

The SSRAA Board supports Proposal 331: 5 AAC 33.370. District 1: Neets Bay Hatchery Salmon Management Plan. Revise the Neets Bay hatchery management plan to allow cost recovery and distribute harvests according to the SSRAA Board of Director's annual plan for allocation as follows:...

There are several reasons to address the existing Neets Bay management plan. The current plan was drafted in 1985 and does not mention important stocks of fish as well as one species of salmon now returning to the Neets Bay SHA. The plan does not represent what currently takes place in Neets Bay through ADF&G Emergency Order, and in addition does not allow the flexibility necessary to manage common property harvest in the SHA to address the current status of the SE Enhanced Salmon Allocation Plan. The chum troll fishery is an important factor in Neets Bay today and there was no chum troll fishery when the plan current was drafted.

The SSRAA Board proposes to remove the management language under (1) and (2)(A) and (2)(B) of the current plan. That language would be replaced with language under (a) and (b) of the proposal that would allow the SSRAA Board to work with ADF&G to annually manage harvest in the SHA by distributing harvest between purse seine, troll and drift gillnet fleets; setting fishing time and area for those fleets by emergency order in accordance with the SSRAA Board's plan for meeting broodstock and cost recovery goals while establishing commercial fisheries which are consistent with the Southeast Enhanced Salmon Allocation Plan.

In practice this would involve annually designing opportunity in the Neets Bay SHA to maximize the value to the fleets within the context of the current status of the Southeast Enhanced Salmon Allocation Plan as well as allowing SSRAA to meet both cost recovery and broodstock needs. With the proposal, the management of the Neets Bay SHA could be changed from year to year related to projected run size and the current status of allocation between the different fleets – as a means to bring balance back toward the agreed allocation.

The SSRAA Board supports Proposal 338: 5 AAC 33.377. District 2: Kendrick Bay Terminal Harvest Area Salmon Management Plan. Expand the Kendrick Bay Terminal Harvest Area to include McLean Arm for commercial seining as follows:...

The addition of McLean Arm to the Kendrick Bay THA was approved by the RPT including ADF&G representatives.

The current Kendrick Bay Terminal Harvest Area is neither large enough to accommodate a terminal fishery confined to the current THA, nor is it a good net pen site during certain weather patterns. Mclean Arm is very close to Kendrick Bay. During the early season, prior to "pink salmon management" a portion of District 102 is open when the Kendrick THA is open. McLean Arm is within that portion of District 102. In addition, there are no significant chum salmon stocks in McLean Arm. Harvest of summer chum in McLean Arm has gone on for a number of years and does not involve wild fish. Enlarging the current THA to include McLean Arm will not dramatically change what currently occurs.

McLean Arm is now permitted as a chum salmon release site by the state as well as the other agencies involved. Related to situations elsewhere in SE, there

is growing concern that excessive numbers of predators can build up around long-term release sites. While there is no indication that this is the case at Kendrick today, SSRAA will test a new strategy that may minimize this issue. As opposed to using a single site across time, we will annually rotate the rearing and release of 30 million chum fry between the current Kendrick site and McLean Arm.

The chum releases at Kendrick are going through a period of good survival. In addition to the reasons for expanding Kendrick listed above, seine participation has significantly increased over the past 5 years. The current Kendrick site is a relative "postage stamp" related to other THA's. Currently the site does not accommodate the effort, a level of effort concentrated on enhanced fish – away from wild stocks. In that sense, the inclusion of McLean Arm to the Kendrick THA allows management to provide seine opportunity when there is uncertainty about wild stock abundance elsewhere.

This proposal was approved by the Regional Planning Team, including ADF&G members, as well as the SSRAA Board; the RPT and the SSRAA Board each have equal representation from the three commercial fleets.

In addition to the proposals above that are part of the Joint RPT Industry Consensus, the SSRAA Board has several comments related to ADF&G's Proposal 337 – 5 AAC 33.3XX. New Section. Establish a new Herring Cove THA management plan to distribute harvest between commercial, sport and personal use fisheries as follows...

The SSRAA Board supports the common property opportunity to harvest SSRAA released fish. We recognize that this has caused problems with the home owners in Herring Cove and we support the efforts of the Ketchikan Advisory Committee and others to resolve these problems within the context of providing harvest opportunity.

We appreciate your time spent in reading this testimony as well as the opportunity to testify.

John Burke
SSRAA General Manager

Industry Consensus 12/8/11

The troll fleet continues to be below its target range; the seine fleet is below its target range; the gillnet fleet above its target range, based on the five year rolling averages calculated and finalized by ADF&G for the seasons up to and including 2009. Although the numbers for 2010 are preliminary and for 2011 very preliminary, it appears there has been movement in the right direction for the troll fleet, probably caused by their additional chum harvests outside of Neets Bay and at Homeshore; and for the seine fleet the movement has been in the wrong direction, probably largely explained by poor survivals at Hidden Falls and Deep Inlet and good survivals at DIPAC facilities.

In recognition of the imbalance and the long-term trends in the distribution of enhanced fish the JRPT recommends to the Board of Fisheries and to the commissioner:

Supporting the USAG and SEAS agreement (signed copy attached) regarding the following board of Fish proposals related to enhanced salmon allocation plan as follows:

- Proposal #295 (modify gillnet fishing in Zimovia Strait) JRPT recommends no action as proposal is being withdrawn.
- Proposal #323 (remove PNP's production from allocation plan) JRPT recommends no action as proposal is being withdrawn.
- Proposal #324 (create separate allocation plans for southern and northern southeast Alaska) JRPT recommends no action as the proposal is being withdrawn.
- Proposal #331. The JRPT is not in unanimous support of the proposal as written. But, the JRPT unanimously supports modification of Neets Bay SHA management as follows: If #331 is not adopted the associations (SEAS & USAG) will jointly request a modification to the current Neets Bay regulation 5AAC 33.370(b) 2 (A) which would delete [THE FIRST OPENING MUST BE FOR GILLNETS]; and ask the JRPT to support this modification, and, if this proposed modification is adopted, recommending to SSRAA that during any late summer or fall net rotation the net fleet below its range would have first start. If #331 is adopted SEAS and USAG will recommend to the SSRAA board continuing the current opening time ratios and rotations in the chinook and early summer chum portions of Neets Bay management and adding at least one more rotation; and continuing the 1-to-1 ratio in any late summer and fall net rotations with the net fleet below its range having first start.
- Proposal #332 (ties Neets Bay opportunities to status of allocation plan) JRPT recommends no action as proposal is being withdrawn.
- Proposal #334 (continue 1-to 1-ratios at Anita Bay) The JRPT recommends support of their proposal with changing the sunset date to 2014 instead of 2017.

- Proposal #335 (continue 1-to 1-ratios at Deep Inlet) The JRPT recommends support of their proposal with changing the sunset date to 2014 instead of 2017.
- Proposal #336 (reestablish rotational fisheries at Nakat) The JRPT recommends no action as proposal is being withdrawn.

In addition the JRPT recommends to the Commissioner:

- Supporting SSRAA's efforts to increase commercial fishing opportunities on salmon released at Neets Bay.

In addition the JRPT makes recommendations on the following Board of Fisheries proposals that affect the Southeast Enhanced Salmon Allocation Plan:

- Proposal #315 (extend coho season to 9/30 in Behm Canal) The JRPT supports extending the coho season to Sept 30th in a portion of Behm Canal to allow additional opportunity on returning enhanced coho to SSRAA.
- Proposal #344 (changing lines at Deep Inlet in May and June). The JRPT recommends support as it would increase troll opportunities on Chinook.
- Proposal #340 (changing lines at Anita Bay) JRPT recommends support of this proposal. This should improve the quality of enhanced salmon harvested at Anita Bay with minimal impact on salmon enhanced allocation plan.
- Proposal #308 (allow six trolling line in inside waters) Consensus that no action should be taken on this proposal for six troll lines as the proposer is withdrawing the proposal.
- Proposal #311 (troll coho retention to June 1 from June 15) JRPT recommends support of coho retention by the troll fleet starting June 1.
- Proposal #325 (chum hatchery access to trolling in June in sub-districts of districts 9, 12, and 14) The JRPT conditionally supports the proposal with the following recommendations: that section (iii) District 9 and sub-district 114-50 is withdrawn from the proposal, and that the proposal sunsets in 3 years; and that a chum salmon management plan is developed in that three year period. It is expected that the proposed management plan is brought back to the JRPT for review and possible submittal as a BOF proposal for the next cycle. This proposal could help the troll fleet who is below their allocated range of enhanced stocks. Since this fishery would be expanding into new areas and amount of effort there are concerns about the composition of stocks that will be harvested and effects on other fisheries.
- Proposal #338 (SSRAA proposal for Kendrick Bay THA) The JRPT has consensus to support this proposal. This proposal adjusts the THA to reflect planned releases in McLean Arm.

- Proposal #343 (ADFG housekeeping proposal so that EO doesn't have to be issued every year for the coho fishery in the THA during the general season coho closure) The JRPT recommends modifications to this ADFG proposal that allows coho retention from June 1st to September 30th. The August 1st date would prevent harvest of coho in a THA that releases coho when trollers can keep coho during the general opening of the summer season. Coho have historically been able to be kept during June 15th to Aug 1st so no wild stock concerns exist.

The JRPT recognizes that it is necessary to tread carefully in making adjustments to production or to SHA management. Fisheries and community activities develop around hatchery opportunities, and future survivals and market condition are difficult to predict. At the same time, the system needs to respond to the guidelines of the allocation plan by working towards providing fair opportunities for the fleets.

The following Associations and individuals were present in the room and did not object to the following industry consensus points in this document that the RPT voted on:

Alaska Trollers Association
Chum Trollers Association
Southeast Alaska Seiners Association
Southeast Alaska Fishermen's Alliance
United Southeast Gillnetters Association

Linda Danner, Eric Jordan, Ryan Wilson, Carl Peterson, Matt Stroemer, Matt Donohoe, Tad Fujioka, Doug Rendle, Dave Otte, Alan Anderson Bill Auger, Arnold Enge, Richard Eliason, Cheyne Blough, Chris Guggenbickler, Rudy Franulovich, Ed Hansen, Kathy Hansen, Bob Thorstenson, Roger Ingman, John Peckham, Mitch Eide, Doug Chaney, Lauch Leach, Nik Nebl, Allen Jacklet, and Bruce Wallace

Letter of Agreement

United Southeast Alaska Gillnetters (USAG) and Southeast Alaska Seiners (SEAS)

December 8, 2011

In the interest of cooperation and to facilitate a productive Board of Fisheries meeting the United Southeast Alaska Gillnetters (USAG) and Southeast Seiners Association (SEAS) agree to the following;

1. USAG agrees to withdraw BOF proposals: 289, 296, 297, 298, 323, 324 and 333 previously submitted to the Alaska Board of Fisheries for the 2011/2012 cycle in Southeast Alaska
2. SEAS agrees to withdraw BOF proposals: 290, 291, 295, 332, and 336 previously submitted to the Alaska Board of Fisheries for the 2011/2012 cycle in Southeast Alaska
3. Both SEAS and USAG will ask the JRPT to amend proposals 334 (Anita Bay THA) and 335 (Deep Inlet THA) in order to change the year of sunset of the 1-to-1 ratios to 2014.
- 4) USAG and SEAS agree to support modification of Neets Bay SHA management as follows: If #331 is not adopted the associations will jointly request a modification to the current Neets Bay regulation 5AAC 33.370(b) 2 (A) which would delete [THE FIRST OPENING MUST BE FOR GILLNETS]; and ask the JRPT to support this modification, and, if this proposed modification is adopted, recommending to SSRAA that during any late summer or fall net rotation the net fleet below its range go first. If #331 is adopted SEAS and USAG will recommend to the SSRAA board continuing the current opening time ratios and rotations in the chinook and early summer chum portions of Neets Bay management and adding at least one more rotation; and continuing the 1-to-1 ratio in any late summer and fall net rotations with the net fleet below its range going first.
5. SEAS and USAG will simultaneously deliver letters to the Alaska Board of Fisheries before January 1, 2012 to provide official notification of withdrawal of the proposals indicated in paragraphs 1 and 2 above.


Bill Auger, President

USAG


Robert Thorstenson, Jr., Executive Director

SEAS

Charles W. Treinen***2054 Arlington Drive******Anchorage, Alaska 99517******Phone: (907) 345-2414 ♦Cell: (907) 229-2478******E-mail: cwtreinen@aol.com*****February 8, 2012****ATTN: BOF COMMENTS****Alaska Department of Fish and Game****Boards Support Section****PO Box 115526****Juneau, AK 99811-5526****FAX: (907) 465-6094****RE: Comment on Southeast Finish Proposals****Dear Chairman Johnstone and Board of Fisheries Members,**

As a SE sac roe herring seine permit holder since 1995 with a family business heavily invested in the herring fishery, I have a critical interest in seeing well managed and sustainable fisheries. Consequently, I am submitting these comments on selected herring proposals that can critically affect my opportunities to harvest available fishery resources. Specifically, I am urging rejection of proposals 230, 231, 232, 238, 239, 240, 242, 243, and 244. I support taking action that will deal with the issues presented in proposal 245 realizing that there are legal aspects. I also urge the board to take action on proposal 273 in the interest of accurate catch accounting.

Proposals 230, 231 and 232:

These three proposals, all submitted by the same individual, seek in some way to alter the Sitka Sound sac roe seine fishery management plan. After multiple cycles of SE finfish Board of Fish as well as Federal Subsistence Board meetings, the déjà vu aspect of these types of proposals is clearly evident to me. The proposer and those he may claim to represent, seem intent on doing whatever they can using whatever means they have to find fault with the way the commercial sac roe herring fishery in Sitka Sound is conducted, regardless of the best available science and data. For example, during the previous two in-cycle meetings, a purported scientific study concerning discrete herring otolith marks was hinted at but never released to justify various restrictive proposals. (To date the 'study', though 'shopped around' to various scientific venues, has not been published and apparently does not stand up to any kind of peer review). An underlying premise of the opponents to the commercial herring fishery seems to be that there are not as many herring now as there used to be—all the good years were in the past and all the bad years are now.

While I believe that anecdotal information has some value in a historical context and can provide guidelines for collection of data that is valid, reliance on that type of information in making present management decisions has limitations and will seriously compromise harvest opportunity on one side and sustainability on the other. That Sitka Sound herring stock abundance in recent years has been on an upward trend is clearly show by the department's assessments and determination of guideline harvest levels.

Not surprisingly, GHJ increases are welcomed by the industry, however, herring fishermen have long been concerned that the department has been grossly underestimating stocks and that we--as well as communities and the state--have been shortchanged by their reluctance to acknowledge the evidence of a larger herring stock. As herring fishermen, we are necessarily tuned into the sophisticated sonar and sounding equipment, have the observational experience, use aerial reconnaissance, and take the time needed to assess the herring stocks. My personal observations and those of my fellow herring fishermen has been overwhelming in a belief that the department has been artificially holding the GHJ to something lower than what it should have been for most of the last 15 years and that the political pressure from opponents of the herring sac roe fishery as a whole has had a role in compromising the department's data and science. Coincidentally, the department's use of 'hind-casting' to adjust for underestimation of the previous year's stock--at first glance--masks the fact that higher quotas have often been warranted. Discounted survey results from 2009 and an ongoing scale analysis discrepancy in 2010 have artificially reduced the GHJ calculation in the previous two years. The much higher 2012 GHJ is likely a vindication of the general impression held by those of us participating in the fishery and is still sufficiently conservative to assure sustainable harvests into the foreseeable future.

Please take no action on proposal 230 in realization that the existence of a problem to address is not clear and that the fishery is already managed conservatively so that 'ecosystem integrity' is assured.

Please take no action on proposal 231 since it is effectively reducing the GHJ without establishing a scientific basis to do so or establishing that a significant over-harvest is occurring.

Please take no action proposal 232 in realization that the present management plan is sufficiently conservative, has probably overcompensated for some of the competing users concerns and has a demonstrated track record of stock protection and growth.

Proposals 238 and 239:

Please take no action on proposals 238 and 239 attempting to establish 'core area' commercial closure for exclusive subsistence use. The same or similar proposals consistently find their way into the BOF proposal book as well as on the Federal Subsistence Board agenda. Such proposals have been consistently turned down in both venues for good reason; there is little evidence of adverse consequences of commercial

herring fisheries and, conversely, little evidence that subsistence harvest would be aided. Department maps that show areas commercially fished in relation to areas where the herring spawned show little or no correlation to the proposed 'core area' closures. These proposals seem to address a problem that doesn't really exist.

Proposal 240:

I oppose proposal 240 that seeks to reallocate harvest from the sac roe fishery to the bait fishery. While I believe that this reallocation would likely run into trouble with CFEC regulations, the proposal may have been submitted in the face of uncertain market conditions that are no longer as pressing as once thought.

Proposal 242:

I oppose this proposal to raise the West Behm Canal herring threshold from 6,000 to 15,000 tons. This proposal, couched in the usual righteousness, is based on 'beliefs' and fears rather than credible science so deserves little consideration.

Proposals 243 and 244:

Please take no action on these two similar proposals that seek to eliminate a seine harvest of sac roe herring in West Behm Canal. Both are submitted by the same individual who stands to make personal gains if passed. Justification for such an allocation change is weak at best, does not address a critical problem and disrupts an established Board-approved usage pattern.

Proposal 245:

I support taking some action on the issues presented by proposal 245 so that the available surplus West Behm Canal herring resource can be harvested in an orderly manner in a seine fishery. Realizing that there are legal restraints to 'designating another permit holder to catch an equal share quota', I would suggest the regulation be modified to specify a registration date prior to the fishery and then divide the GHF by the number of registered permit holders rather than the overall pool of permit holders. All permit holders registered would by legal necessity be on the grounds.

Proposal 273:

Please take action on Proposal 273 requiring a permit for Sitka Sound herring subsistence fishery participants for all the reasons expressed by the Southeast Herring Conservation Alliance, a group consisting of SE Herring sac roe seine permit holders and others associated with the SE herring fishery. This proposal is regularly submitted for triennial Board review and regularly opposed by those claiming to represent subsistence roe on branches harvesters with feigned outrage over such an 'onerous' requirement. Although it seems that the department's subsistence staff would welcome registration as a tool to provide reliable data, they have not been supportive. Nonetheless, written reports and

testimony on a roe on branches harvest conducted under the auspices of the Southeast Herring Conservation Alliance clearly demonstrate the ridiculous shortcomings of the data used and claims made in establishing the 'amount necessary' for subsistence. After multiple in-cycle meetings, it is evident to me that the opponents of accountability are attempting to hide their actual harvests in order to achieve some other objective. I hope that this time the board will take a step toward accuracy in catch accounting for subsistence harvests so that false and inaccurate data are not used as a means of furthering a separate agenda. Given the reported 'poaching' of subsistence roe on branches sets, a registration requirement might assist in making the subsistence activities more orderly.

Thank you for the opportunity to submit written testimony.


Charles W. Treinen



UNITED FISHERMEN OF ALASKA

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February 9, 2012

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RECEIVED

FEB 09 2012

BOARDS

RE: Comment on Southeast Fish Proposals

Dear Chairman Johnstone and Board of Fisheries Members,

United Fishermen of Alaska (UFA) is the largest statewide commercial fishing trade association, representing 37 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. UFA supports access by the public to Alaskan's seafood resources through commercial fisheries.

UFA supports industry collaboration in developing a consensus position on allocative proposals between gear types, such as the agreement by salmon gear groups on proposals contained within the "Joint RPT industry Consensus agreement."

In general, our comments are based on the need for well-documented scientific basis and assessment of the economic effects for proposals that would restrict or eliminate commercial fishing access. The majority of the American public accesses Alaska's fishing resources through commercial fishing. We are unable to support actions that reallocate from the commercial sector to the sport sector, restricting access by the majority of the American public who purchase seafood through restaurants and supermarkets. Reallocation to sport is detrimental to many communities and processors that have invested in rural or small communities that are economically dependent on commercial fishing.

To help illustrate the impact of commercial fisheries to Southeast and Alaska communities, we have attached copies of our Community Commercial Fishing and Seafood Processing Fact Sheets of statistics on fishing and processing jobs, income, and shared municipal revenue from State of Alaska and Federal government sources (also online at <http://www.ufa-fish.org/cff.htm>).

We offer the following additional comments on specific proposals:

PROPOSAL 230 Revise the commercial herring fishery management plan for Sitka Sound.

PROPOSAL 231 Amend management for the herring sac roe fishery GHL in Sections 13-A and 13-B.

PROPOSAL 232 Repeal regulations for establishing the herring fishery GHL for Sections 13-A and 13-B.

PROPOSAL 242 Increase threshold for the West Behm Canal Herring Fishery from 6,000 tons to 15,000 tons.

Oppose- UFA is opposed to these actions that would undermine the ability of ADF&G to effectively manage a fishery. These proposals would alter the management of the Southeast herring fisheries without basis or merit.

PROPOSAL 238 Establish closed waters for the Sitka Sound commercial herring fishery in order to provide an area only open for subsistence.

PROPOSAL 239 Exclude commercial herring fishing within a defined core spawning area within Sitka Sound to allow for a harvest of herring spawn to meet the amount reasonably necessary for subsistence.

Oppose- At the fall 2011 UFA board meeting, many commercial fishing group representatives and individuals expressed concern about the quality of information gathered regarding subsistence harvest, dated, or even lack of basic information on subsistence activities related to Board of Fish proposals and actions in the State of Alaska. In order to address these concerns, UFA wrote the Governor to support increased funding in the ADF&G Subsistence Division budget for the purpose of gathering accurate, scientifically peer reviewed, verifiable and timely data regarding subsistence harvest in the State of Alaska. The Governor's present budget does indeed show an increase of \$317K of funding for the Subsistence Division core services. UFA urges the Board of Fish to refrain from making decisions that may reallocate resources away from commercial users when data on subsistence use is, outdated, of questionable quality and cannot be shown to have any material effect on subsistence use patterns or resource availability.

PROPOSAL 273 Require a permit for subsistence herring eggs on branches in Sitka Sound or alter the harvest monitoring program to measure landed weights.

Support- UFA supports accurate accounting of all removals as the primary goal for sustainable fisheries management.

PROPOSAL 210 Require release of demersal shelf rockfish at depth.

PROPOSAL 211 Require release of rockfish at 40 feet or greater.

Support in Concept - UFA is looking forward to additional information being provided at the upcoming Board of Fish finfish meeting that will clarify the practicability and enforceability of these proposals. We urge the Board to consider a phase-in approach to these proposals if adopted in order to properly educate the public before full implementation of regulations.

PROPOSAL 212 Increase the sport allocation of demersal shelf rockfish to 25 percent.

PROPOSAL 221 Increase sport allocation of lingcod in Central Southeast Outside and Southern Southeast Outside sections.

Oppose – We oppose arbitrary re-allocations from the larger body of the public who access fish through commercial fisheries. We oppose actions that reallocate from the commercial sector to the sport sector as these proposals are divisive and restrict access by the majority of the American public who purchase seafood through restaurants and supermarkets. The commercial sector needs to keep its present allocation so that it is available when halibut stocks rebound.

PROPOSAL 214 Standardize sablefish retention and reporting requirements in regulation.

Support – UFA supports thorough accounting of all harvests, and this proposal would provide consistency between northern and southern inside districts for sablefish.

PROPOSAL 216 Repeal the nonresident sablefish annual limit.

Oppose- Establishing and maintaining the annual sablefish limit for nonresident anglers is necessary and essential to sustainable fisheries management. Sablefish populations are currently at low levels and fisheries managers in the Federal and State fisheries are managing very conservatively. UFA does not feel that there is a problem evident that this proposal seeks to address. The concept of “no bag limits” creates an expectation and culture of always taking without regard for sustainability and other historic users—this is not an attitude Alaskans’ support.

PROPOSAL 248 Change the definition of “bag limit” for anglers fishing from a vessel.

Oppose- Changing from an individual daily bag limit to an overall limit for the boat, based on number of anglers is likely to increase harvest by vessel-based sport and guided anglers in undeterminable ways. We are supportive of the current regulations that establish reasonable expectations for anglers. Daily bag limits are a maximum, not the guaranteed or expected harvest for sport anglers. Changing to a boat limits would create a culture of taking without individual accountability for sustainable fisheries.

It is especially troublesome that this proposal is explained as “...*merely legalizes what is currently practiced by most anglers: resident or nonresident*” by an F&G Advisory committee. The acknowledgement of this practice by a F&G advisory committee highlights the need for increased enforcement in the area.

PROPOSAL 249 Establish nonresident annual limits for sockeye, coho, chum, and pink salmon in the Southeast Alaska Area.

Support- UFA is supportive of this proposal submitted by the Southeast Subsistence Regional Advisory Council, that establishes reasonable expectations for anglers visiting Alaska.

PROPOSAL 270 Require a permit for subsistence or personal use harvest of sablefish.

-Support - UFA supports accurate accounting of all removals as the primary means of achieving sustainable fisheries management.

PROPOSAL 301 Relocate boundary for commercial setnet fishing on Tsiu River to provide a separate sport fishing area.

Oppose. UFA opposes this arbitrary closure of longstanding setnet fisheries. We recommend that tourism growth be encouraged to fit in with existing prior uses, rather than to seek to displace them, as a general development philosophy in the best interest of all Alaskans.

PROPOSAL 294 Require reporting of commercially-caught salmon and steelhead retained for personal use.

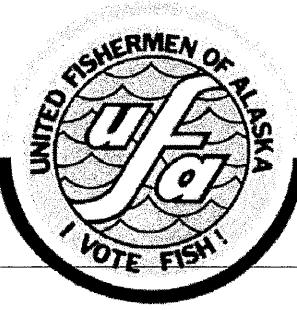
Oppose While we support the concept of accurate reporting of all removals and mortality, the proposal is impractical in that it would require commercial fishing participants to contact a creel census taker, which are not generally present and available at commercial tenders and all commercial fishing harbors. The current requirement to report commercial fish retained for personal use should provide the necessary recordkeeping of removals as needed for sustainable management.

Thank you for your consideration, and for your public service as Board of Fisheries members.

Sincerely,



President



UNITED FISHERMEN OF ALASKA

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Alaska Community Commercial Fishing and Seafood Processing Fact Sheets

A compilation of information on employment, income, and municipal revenue of selected Alaska cities, boroughs and census areas from information from State of Alaska and federal government sources. 2011 edition based on 2010 yearly data (2009 where 2010 is not available).

Juneau City & Borough.....	1
Ketchikan City & Borough.....	2
Petersburg.....	3
Sitka.....	4
Wrangell.....	5
Aleutians East Borough.....	6
Anchorage.....	7
Bristol Bay Borough.....	8
Cordova.....	9
Dillingham.....	10
Homer.....	11
Kenai.....	12
Kenai Peninsula Borough.....	13
Kodiak.....	14
Lake & Peninsula Borough.....	15
Seward.....	16
Unalaska - Dutch Harbor & Aleutians West Borough.....	17
Wasilla - Palmer & Mat-Su Borough.....	18



Juneau, Alaska

Commercial Fishing and Seafood Processing Facts

United Fishermen of Alaska
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Juneau City & Borough is the #42 fishing port in the U.S. by Volume & #35 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Juneau City & Borough:

CFEC commercial fishing permit holders: 390¹
Total permits owned: 656¹
Permitholders who fished: 259¹
Commercial Crew license holders: 471²
Total Skippers who fished plus Crew in 2010: 730^{1,2}
Percentage of residents who fished: 2%^{1,2,4}
Vessels Home Ported: 748³

Each of these individual small and family businesses represents investment, employment, and income in the Juneau City & Borough community.

Income:

Estimated 2010 ex-vessel income by Juneau-based fishermen: **\$21,451,996¹**

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Juneau City & Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009): 430⁵
Total processing wages: (2009): \$ 3,958,266⁵
First wholesale value (2009): \$39 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries • Ted Stevens Marine Research Lab • Alaska Seafood Marketing Institute • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **16 million pounds⁷** of seafood were landed in Juneau City & Borough for an estimated value of **\$23.8 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **Juneau City and Borough** and the **State of Alaska** each received **\$298,863⁸** in fishery business and landing taxes through the municipal tax-sharing program from Juneau City & Borough fisheries landings and businesses.

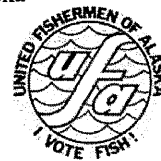
Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Ketchikan City & Borough, Alaska

Commercial Fishing and Seafood Processing Facts

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Ketchikan is the #16 fishing port in the U.S. by Volume & #19 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Ketchikan City & Borough:

CFEC commercial fishing permit holders: 283¹

Total permits owned: 494¹

Permitholders who fished: 209¹

Commercial Crew license holders: 350²

Total Skippers who fished plus Crew in 2010: 559^{1,2}

Percentage of residents who fished: 4%^{1,2,4}

Vessels Home Ported: 364³

Each of these individual small and family businesses represents investment, employment, and income in the Ketchikan City & Borough community.

Income:

Estimated 2010 ex-vessel income by Ketchikan City & Borough-based fishermen: \$19,886,698¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Ketchikan City & Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 -Borough): 1,274⁵

Total processing wages: (2009-Borough): \$ 12,094,919⁵

First wholesale value (2009 – Borough): \$91 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **75.7 million pounds⁷** of seafood were landed in Ketchikan City & Borough for an estimated value of **\$41.3 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – The **City of Ketchikan** received **\$277,158**, the **Ketchikan Gateway Borough** received **\$407,888**, and the State of Alaska received **\$685,046⁸** in fishery business and landing taxes through the municipal tax-sharing program from Ketchikan City & Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Petersburg, Alaska

Commercial Fishing and Seafood Processing Facts

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Petersburg is the #20 fishing port in the U.S. by Volume & #23 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Petersburg:

CFEC commercial fishing permit holders: 469¹

Total permits owned: 1104¹

Permitholders who fished: 367¹

Commercial Crew license holders: 471²

Total Skippers who fished plus Crew in 2010: 838^{1,2}

Percentage of residents who fished: 28.4%^{1,2,4}

Vessels Home Ported: 579³

Each of these individual small and family businesses represents investment, employment, and income in the Petersburg community.

Income:

Estimated 2010 ex-vessel income by Petersburg-based fishermen: \$51,222,064¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Petersburg benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 – City of Petersburg): 1,030⁵

Total processing wages: (2009- City of Petersburg): \$ 8,507,095⁵

First wholesale value (2009 – Wrangell – Petersburg Census Area): \$90 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, 49.9 million pounds⁷ of seafood were landed in Petersburg for an estimated value of \$36.3 million⁷, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – Petersburg and the State of Alaska each received \$605,220⁸ in fishery business and landing taxes through the municipal tax-sharing program from Petersburg fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/rnnu.htm>

2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.

3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>

4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm

5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>

6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute

7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>

8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Sitka, Alaska

Commercial Fishing and Seafood Processing Facts

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Sitka is the #18 fishing port in the U.S. by Volume & #20 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Sitka:

CFEC commercial fishing permit holders: 564¹

Total permits owned: 1094¹

Permitholders who fished: 457¹

Commercial Crew license holders: 648²

Total Skippers who fished plus Crew in 2010: 1,105^{1,2}

Percentage of residents who fished: 12.4%^{1,2,4}

Vessels Home Ported: 605³

Each of these individual small and family businesses represents investment, employment, and income in the Sitka community.

Income:

Estimated 2010 ex-vessel income by Sitka-based fishermen: \$40,151,347¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Sitka benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009): 900⁵

Total processing wages: (2009): \$ 10,639,043⁵

First wholesale value (2009): \$104 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **74.6 million pounds⁷** of seafood were landed in Sitka for an estimated value of **\$62.2 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **Sitka and the State of Alaska** each received **\$917,991⁸** in fishery business and landing taxes through the municipal tax-sharing program from Sitka fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Wrangell, Alaska

Commercial Fishing and Seafood Processing Facts

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Wrangell is the #79 fishing port in the U.S. by Volume & #76 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Wrangell:

CFEC commercial fishing permit holders: 214¹

Total permits owned: 399¹

Permitholders who fished: 159¹

Commercial Crew license holders: 214²

Total Skippers who fished plus Crew in 2010: 373^{1,2}

Percentage of residents who fished: 15.7%^{1,2,4}

Vessels Home Ported: 212³

Each of these individual small and family businesses represents investment, employment, and income in the Wrangell community.

Income:

Estimated 2010 ex-vessel income by Wrangell-based fishermen: \$9,596,131¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Wrangell benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs: 397⁵ (Wrangell)... 1427⁵ (Wrangell-Petersburg Census Area)

Total processing wages: (2009-Wrangell-Petersburg Census Area): \$ 11,237,650⁵

First wholesale value (2009-Wrangell-Petersburg Census Area): \$90 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **4.4 million pounds⁷** of seafood were landed in Wrangell for an estimated value of **\$7.9 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **Wrangell** and the **State of Alaska** each received **\$105,984⁸** in fishery business and landing taxes through the municipal tax-sharing program from Wrangell fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/st1/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Aleutians East Borough, Alaska

Commercial Fishing and Seafood Processing Facts

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JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Aleutians East Borough:

CFEC commercial fishing permit holders: 204¹
Total permits owned: 465¹
Permitholders who fished: 185¹
Commercial Crew license holders: 320²
Total Skippers who fished plus Crew in 2010: 505^{1,2}
Percentage of residents who fished: 16%^{1,2,4}
Vessels Home Ported: 324³

Each of these individual small and family businesses represents investment, employment, and income in the Aleutians East Borough community.

Income:

Estimated 2010 ex-vessel income by Aleutians East Borough-based fishermen: \$23,431,377¹
Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Aleutians East Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 -Borough): 3,059⁵
Total processing wages: (2009-Borough): \$ 49,816,701⁵
First wholesale value (2009 – Borough): \$377 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

Seafood is the primary export of Alaska coastal communities, providing hundreds of transportation jobs throughout the state.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – Aleutians East cities received \$1.3 million, the Borough received \$1.6 million and the State of Alaska received \$2,972,542⁸ in fishery business and landing taxes through the municipal tax-sharing program from Aleutians East Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html> (not available for Aleutians East Borough)
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Anchorage, Alaska

Commercial Fishing and Seafood Processing Facts

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Anchorage is the #61 fishing port in the U.S. by Volume & #67 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Anchorage:

CFEC commercial fishing permit holders: 788¹
Total permits owned: 967¹
Permitholders who fished: 496¹
Commercial Crew license holders: 1,307²
Total Skippers who fished plus Crew in 2010: 1,803^{1,2}
Rank among Alaska cities for total skippers & crew fishing: #1^{1,2}
Vessels Home Ported: 132³

Each of these individual small and family businesses represents investment, employment, and income in the Anchorage community.

Income:

Estimated 2010 ex-vessel income by Anchorage-based fishermen: \$43,342,138¹
Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Anchorage benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs: 630⁵
Total processing wages: \$ 5,816,664⁵
First wholesale value: \$13 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **7 million pounds**⁷ of seafood were landed in Anchorage for an estimated value of **\$9.5 million**⁷, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **Anchorage** and the State of Alaska each received **\$143,049**⁸ in fishery business and landing taxes through the municipal tax-sharing program from Anchorage fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Bristol Bay Borough, Alaska

Commercial Fishing and Seafood Processing Facts

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Naknek-King Salmon is the #11 fishing port in the U.S. by Volume & #4 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Bristol Bay Borough:

CFEC commercial fishing permit holders: 163¹

Total permits owned: 183¹

Permitholders who fished: 140¹

Commercial Crew license holders: 162²

Total Skippers who fished plus Crew in 2010: 302^{1,2}

Percentage of residents who fished: 30%^{1,2,4}

Vessels Home Ported: 323³

Each of these individual small and family businesses represents investment, employment, and income in the Bristol Bay Borough community.

Income:

Estimated 2010 ex-vessel income by Bristol Bay Borough-based fishermen: \$551,888¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Bristol Bay Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 -Borough): 3,093⁵

Total processing wages: (2009-Borough): \$ 20,611,835⁵

First wholesale value (2009 – Borough): \$161 million⁵

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **124.1 million pounds⁷** of seafood were landed in the Bristol Bay Area for an estimated value of **\$100.9 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **Bristol Bay Borough** and the **State of Alaska** each received **\$1,796,505⁸** in fishery business and landing taxes through the municipal tax-sharing program from Bristol Bay Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at:

<http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>

2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.

3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>

4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at:

http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm

5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>

6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute

7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology:

<http://www.st.nmfs.noaa.gov/st1/commercial/index.html>

8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Cordova, Alaska

Commercial Fishing and Seafood Processing Facts

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Cordova is the #8 fishing port in the U.S. by Volume & #5 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Cordova:

CFEC commercial fishing permit holders: 338¹
Total permits owned: 595¹
Permitholders who fished: 298¹
Commercial Crew license holders: 312²
Total Skippers who fished plus Crew in 2010: 610^{1,2}
Percentage of residents who fished: 27.2%^{1,2,4}
Vessels Home Ported: 663³

Each of these individual small and family businesses represents investment, employment, and income in the Cordova community.

Income:

Estimated 2010 ex-vessel income by Cordova-based fishermen: \$52,731,434¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Cordova benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 –Cordova-Valdez Census Area): 1,663⁵
Total processing wages: (2009 –Cordova-Valdez Census Area): \$16,989,536⁵
First wholesale value (2009 –Cordova-Valdez Census Area): \$125 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **147.7 million pounds⁷** of seafood were landed in Cordova for an estimated value of **\$84.3 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **The City of Cordova and the State of Alaska each received \$757,961⁸** in fishery business and landing taxes through the municipal tax-sharing program from Cordova fisheries landings and businesses.

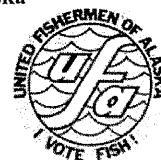
Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/st1/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Dillingham, Alaska

Commercial Fishing and Seafood Processing Facts

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JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Dillingham:

CFEC commercial fishing permit holders: 610¹

Total permits owned: 772¹

Permitholders who fished: 380¹

Commercial Crew license holders: 687²

Total Skippers who fished plus Crew in 2010: 1,067^{1,2}

Percentage of residents who fished: 22.3%^{1,2,4}

Vessels Home Ported: 394³

Each of these individual small and family businesses represents investment, employment, and income in the Dillingham community.

Income:

Estimated 2010 ex-vessel income by Dillingham-based fishermen: \$5,259,935¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Dillingham benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 – Dillingham Census Area): 919⁵

Total processing wages: (2009- Dillingham Census Area): \$ 6,441,357⁵

First wholesale value (2009 – Dillingham Census Area): \$51 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – the Dillingham Census Area and the State of Alaska each received \$339,973⁸ in fishery business and landing taxes through the municipal tax-sharing program from Dillingham fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/comddb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/st1/commercial/index.html> (not available for Dillingham)
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Homer, Alaska

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Homer is the #35 fishing port in the U.S. by Volume & #13 by Value of 2010 landings

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Homer:

CFEC commercial fishing permit holders: 575¹
Total permits owned: 1047¹
Permitholders who fished: 424¹
Commercial Crew license holders: 632²
Total Skippers who fished plus Crew in 2010: 1,056^{1,2}
Percentage of residents who fished: 21.1%^{1,2,4}
Vessels Home Ported: 493³

Each of these individual small and family businesses represents investment, employment, and income in the Homer community.

Income:

Estimated 2010 ex-vessel income by Homer-based fishermen – includes deliveries statewide: \$77,242,343¹
Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Homer benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 - Kenai Peninsula Borough): 1,846⁵
Total processing wages (2009 - Kenai Peninsula Borough): \$ 11,590,049⁵
First wholesale value (2009 - Kenai Peninsula Borough): \$151 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, 19.9 million pounds⁷ of seafood were landed in Homer for an estimated value of \$56.1 million⁷, and most of this was shipped or flown out, providing many more support sector jobs.

REVENUE to the State and Community through Fishery Taxes...

FY 2010 Shared taxes – The city of Homer received \$74,283, Kenai Peninsula Borough received \$622,268, and the State of Alaska received \$1,149,746⁸ in fishery business and landing taxes through the municipal tax-sharing program from Homer and Kenai Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Kenai, Alaska

Commercial Fishing and Seafood Processing Facts

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Kenai is the #33 fishing port in the U.S. by Volume & #33 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Kenai:

CFEC commercial fishing permit holders: 226¹

Total permits owned: 280¹

Permitholders who fished: 161¹

Commercial Crew license holders: 292²

Total Skippers who fished plus Crew in 2010: 453^{1,2}

Percentage of residents who fished: 6.4%^{1,2,4}

Vessels Home Ported: 164³

Each of these individual small and family businesses represents investment, employment, and income in the Kenai community.

Income:

Estimated 2010 ex-vessel income by Kenai-based fishermen: \$10,113,036¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Kenai benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 - Kenai Peninsula Borough): 1,846⁵

Total processing wages: (2009 - Kenai Peninsula Borough) \$ 11,590,049⁵

First wholesale value (2009 - Kenai Peninsula Borough): \$151 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **21.2 million pounds⁷** of seafood were landed in Kenai for an estimated value of **\$25.1 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – The **City of Kenai** received **\$148,581**, the **Kenai Peninsula Borough** received **\$622,268**, and the **State of Alaska** received **\$1,149,746⁸** in fishery business and landing taxes through the municipal tax-sharing program from Kenai and Kenai Peninsula Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>

2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.

3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>

4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/comddb/CF_COMDB.htm

5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>

6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute

7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/st/commercial/index.html>

8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Kenai Peninsula Borough, Alaska

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JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Kenai Peninsula Borough:

CFEC commercial fishing permit holders: 1,428¹

Total permits owned: 2,203¹

Permitholders who fished: 1,024¹

Commercial Crew license holders: 1,659²

Total Skippers who fished plus Crew in 2010: 2,683^{1,2}

Rank among Alaska Boroughs and Census Areas for total permit holders: #1⁶

Vessels Home Ported: 981³

Each of these individual small and family businesses represents investment, employment, and income in the Kenai Peninsula Borough community.

Income:

Estimated 2010 ex-vessel income by Kenai Peninsula Borough-based fishermen: \$122,140,353¹

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Kenai Peninsula Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009): 1,846⁵

Total processing wages: (2009): \$ 11,590,049⁵

Percentage of Alaska resident seafood processing jobs in Kenai Peninsula Borough (2009): 46.6%⁵

Percentage of seafood processing wages paid to Alaska resident seafood processing workers in K.P. Borough: 51.2%⁵

First wholesale value (2009): \$151 million⁶

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **124.1 million pounds⁷** of seafood were landed in the Kenai Peninsula Area for an estimated value of **\$100.9 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – **Kenai Peninsula Borough** and the **State of Alaska** each received **\$1,796,505⁸** in fishery business and landing taxes through the municipal tax-sharing program from Kenai Peninsula Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>

2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.

3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>

4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm

5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>

6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute

7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/st1/commercial/index.html>

8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Kodiak, Alaska

Commercial Fishing and Seafood Processing Facts

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Kodiak is the #4 fishing port in the U.S. by Volume & #3 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Kodiak (includes Kodiak Island Borough):

CFEC commercial fishing permit holders: **592¹**

Total permits owned: **1324¹**

Permitholders who fished: **458¹**

Commercial Crew license holders (does not include CFEC permitholders who crewed): **961²**

Total Skippers who fished plus Crew in 2010: **1,419^{1,2}**

Percentage of residents who fished: **10%^{1,2,4}**

Vessels Home Ported: **622³**

Each of these individual small and family businesses represents investment, employment, and income in the Kodiak community.

Income:

Estimated 2010 ex-vessel income by Kodiak-based fishermen: **\$126,918,455¹**

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Kodiak benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 -Borough): **2,936⁵**

Total processing wages: (2009-Borough): **\$ 41,068,725⁵**

First wholesale value (2009 – Borough): **\$261 million⁶**

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **325.3⁷ million pounds** of seafood were landed in Kodiak for an estimated value of **\$128.1 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – The City of Kodiak received **\$740,960**, Kodiak Island Borough received **\$1,046,401** and the State of Alaska received **\$1,875,076⁸** in fishery business and landing taxes through the municipal tax-sharing program from Kodiak Island fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at:

<http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>

2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.

3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>

4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm

5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>

6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute

7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology:

<http://www.st.nmfs.noaa.gov/stl/commercial/index.html>

8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Lake & Peninsula Borough, Alaska

Commercial Fishing and Seafood Processing Facts

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JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Lake & Peninsula Borough:

CFEC commercial fishing permit holders: 147¹
Total permits owned: 191¹
Permitholders who fished: 113¹
Commercial Crew license holders: 220²
Total Skippers who fished plus Crew in 2010: 333^{1,2}
Percentage of residents who fished: 20.8%^{1,2,4}
Vessels Home Ported: 153³

Each of these individual small and family businesses represents investment, employment, and income in the Lake & Peninsula Borough community.

Income:

Estimated 2010 ex-vessel income by Lake & Peninsula Borough-based fishermen: **\$10,420,448¹**

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Lake & Peninsula Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 -Borough): 523⁵
Total processing wages: (2009-Borough): **\$ 4,132,173⁵**
First wholesale value (2009 – Borough): **\$38 million⁶**

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

Seafood is the primary export of Alaska coastal communities, providing hundreds of transportation jobs throughout the state.

REVENUE to the State and Community through Fishery Taxes...

FY 2010 Shared taxes – **Lake and Peninsula Borough** received **\$214,796** and the **State of Alaska** received **\$382,879⁸** in fishery business and landing taxes through the municipal tax-sharing program from Lake & Peninsula Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/st1/commercial/index.html> (not available for Lake & Peninsula Borough)
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Seward, Alaska

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Seward is the #17 fishing port in the U.S. by Volume & #9 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Seward:

CFEC commercial fishing permit holders: 62¹
Total permits owned: 118¹
Permitholders who fished: 43¹
Commercial Crew license holders: 118²
Total Skippers who fished plus Crew in 2010: 161^{1,2}
Percentage of residents who fished: 6%^{1,2,4}
Vessels Home Ported: 88³

Each of these individual small and family businesses represents investment, employment, and income in the Seward community.

Income:

Estimated 2010 ex-vessel income by Seward-based fishermen: **\$10,746,450¹**

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Seward benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 - Kenai Peninsula Borough): **1,846⁵**
Total processing wages: (2009 - Kenai Peninsula Borough): **\$ 11,590,049⁵**
First wholesale value (2009 - Kenai Peninsula Borough): **\$151 million⁶**

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Life Center • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **75.4 million pounds⁷** of seafood were landed in Seward for an estimated value of **\$69.2 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes – The **City of Seward** received **\$298,316⁸**, the **Kenai Peninsula Borough** received **\$622,268⁸**, and the **State of Alaska** received **\$1,149,746⁸** in fishery business and landing taxes through the municipal tax-sharing program from Seward and Kenai Peninsula Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.
3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm
5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Unalaska - Dutch Harbor & Aleutians West Borough, Alaska Commercial Fishing and Seafood Processing Facts

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Unalaska-Dutch Harbor is #1 fishing port in the U.S. by Volume & #2 by Value of 2010 landings.

JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Unalaska - Dutch Harbor - Aleutians West Borough:

CFEC commercial fishing permit holders: 21¹

Total permits owned: 38¹

Permitholders who fished: 19¹

Commercial Crew license holders: 73²

Total Skippers who fished plus Crew in 2010: 92^{1,2}

Percentage of residents who fished: 1.7%^{1,2,4}

Vessels Home Ported: 30³

Each of these individual small and family businesses represents investment, employment, and income in the Unalaska - Dutch Harbor and Aleutians West Borough community.

Income:

Estimated 2010 ex-vessel income by Unalaska - Dutch Harbor - Aleutians West Borough-based fishermen: **\$3,283,682¹**

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Unalaska - Dutch Harbor and Aleutians West Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 - total for Borough): 3313⁵

Total processing wages: (2009-Borough): **\$ 55,434,469⁵**

First wholesale value (2009 - Borough): **\$360 million⁶**

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists. **Government related jobs include** Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

TRANSPORTATION JOBS AND BENEFITS

In 2010, **515.2 million pounds⁷** of seafood were landed in Unalaska - Dutch Harbor & Aleutians West Borough for an estimated value of **\$163.1 million⁷**, and most of this was shipped or flown out, providing many more jobs.

REVENUE to the State and Community through Fishery Taxes ...

FY 2010 Shared taxes - Unalaska received \$6.1 million, St. Paul received \$758,340, and the State of Alaska received \$6,953,153⁸ in fishery business and landing taxes through the municipal tax-sharing program from Unalaska - Dutch Harbor & Aleutians West Borough fisheries landings and businesses.

Footnotes - Sources:

1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>

2. Crew numbers are from Alaska Department of Fish and Game 2010 Crew license list, and is the number of individuals who list their address in a given city.

3. Vessel home port numbers are from AK CFEC - online at <http://www.cfec.state.ak.us/plook/>

4. 2010 Population figures used to calculate percentage of resident skippers who fished plus crew is from DCCED AK Community Information Database online at: http://www.dced.state.ak.us/dca/commdb/CF_COMDB.htm

5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>

6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute

7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology:

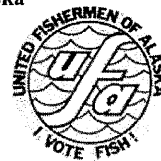
<http://www.st.nmfs.noaa.gov/stl/commercial/index.html>

8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

Wasilla, Palmer & Mat-Su Borough, Alaska

Commercial Fishing and Seafood Processing Facts

United Fishermen of Alaska
211 Fourth St. Suite 110
Juneau, AK 99801-1172
Phone 907.586.2820
Fax 907.463.2545
ufa@ufa-fish.org
www.ufa-fish.org



JOBS - FISHING

Permit holders, Crew and Vessels (2010) in Wasilla - Palmer -Mat-Su Borough:

CFEC commercial fishing permit holders: **301¹**

Total permits owned: **375¹**

Permitholders who fished: **213¹**

Commercial Crew license holders: **405²**

Total Skippers who fished plus Crew in 2010: **618^{1,2}**

Rank among Alaska census areas for total skippers & crew fishing: **#11⁶**

Vessels Home Ported: **28³**

Each of these individual small and family businesses represents investment, employment, and income in the Wasilla - Palmer -Mat-Su Borough community.

Income:

Estimated 2010 ex-vessel income by Wasilla - Palmer -Mat-Su Borough-based fishermen: **\$14,694,432¹**

Earnings generated from commercial fishing circulated in the local economy through property and sales taxes; purchases of homes, rentals, hotels, electricity, entertainment, fuel, vehicles, food, repair and maintenance parts, transportation, travel, medical, and other services. **Virtually every business in Wasilla - Palmer -Mat-Su Borough benefits from commercial fishing dollars.**

JOBS - PROCESSING

Seafood processing jobs (2009 -Borough): **35⁵**

Total processing wages: (2009-Borough): **\$ 168,160⁵**

...AND MORE JOBS

In addition to direct harvester and processor workers, fisheries related jobs include fuel, accountants, consultants, air and water travel, hardware and marine repair and supply businesses, advocacy and marketing organizations, air cargo crew, freight agents, and scientists.

Government related jobs include Alaska Department of Fish and Game • Fish and Wildlife Protection/Alaska Department of Public Safety • Docks and Harbors • Alaska State Troopers • United States Coast Guard • University of Alaska School of Fisheries, • Alaska Sea Grant Marine Advisory program, and more.

REVENUE to the State through Fishery Taxes-

The State general fund received over **\$16 million⁸** in its share of fishery business and landings taxes in 2010, and seafood industry contributions totaled over **\$70 million⁸**. The seafood industry is second only to oil & gas in revenue generated to the State (2010).

Footnotes - Sources:

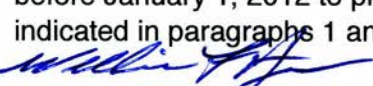
1. Commercial fishing permit activity, estimated harvest and earnings by permit holders are from AK Commercial Fishery Entry Commission (CFEC) at: <http://www.cfec.state.ak.us/gpbycen/2010/mnu.htm>
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3. Vessel home port numbers are from AK CFEC – online at <http://www.cfec.state.ak.us/plook/>
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5. Processor Employment and Wages Data is from Alaska Department of Labor at <http://labor.alaska.gov/research/seafood/statewide/AKSFPBorca.pdf>
6. Processor 1st wholesale value by Census Area 2009 provided by Alaska Seafood Marketing Institute
7. National rank and NOAA total landings and value for selected ports is from NOAA Fisheries - Office of Science & Technology: <http://www.st.nmfs.noaa.gov/stl/commercial/index.html>
8. Revenue figures from 2010 AK Dept of Revenue Shared Taxes report: <http://www.tax.alaska.gov/programs/sourcebook/index.aspx>

United Southeast Alaska Gillnetters (USAG) and Southeast Alaska Seiners (SEAS)

December 8, 2011

In the interest of cooperation and to facilitate a productive Board of Fisheries meeting the United Southeast Alaska Gillnetters (USAG) and Southeast Seiners Association (SEAS) agree to the following;.

1. USAG agrees to withdraw BOF proposals: 289, 296, 297, 298, 323,324 and 333 previously submitted to the Alaska Board of Fisheries for the 2011/2012 cycle in Southeast Alaska
2. SEAS agrees to withdraw BOF proposals: 290, 291, 295, 332, and 336 previously submitted to the Alaska Board of Fisheries for the 2011/2012 cycle in Southeast Alaska
3. Both SEAS and USAG will ask the JRPT to amend proposals 334 (Anita Bay THA) and 335 (Deep Inlet THA) in order to change the year of sunset of the 1-to-1 ratios to 2014.
- 4) USAG and SEAS agree to support modification of Neets Bay SHA management as follows: If #331 is not adopted the associations will jointly request a modification to the current Neets Bay regulation 5AAC 33.370(b) 2 (A) which would delete [THE FIRST OPENING MUST BE FOR GILLNETS]; and ask the JRPT to support this modification, and, if this proposed modification is adopted, recommending to SSRAA that during any late summer or fall net rotation the net fleet below its range go first. If #331 is adopted SEAS and USAG will recommend to the SSRAA board continuing the current opening time ratios and rotations in the chinook and early summer chum portions of Neets Bay management and adding at least one more rotation; and continuing the 1-to-1 ratio in any late summer and fall net rotations with the net fleet below its range going first.
5. SEAS and USAG will simultaneously deliver letters to the Alaska Board of Fisheries before January 1, 2012 to provide official notification of withdrawal of the proposals indicated in paragraphs 1 and 2 above.


Bill Auger, President

USAG


Robert Thorstenson, Jr., Executive Director

SEAS

UNITED SOUTHEAST ALASKA GILLNETTERS

PO Box 20538, Juneau, AK 99802 (253) 237-3099 usag.alaska@gmail.com

www.akgillnet.org

February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

RECEIVED
FEB 08 2012
BOARDS

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 277. Allow Dip Nets in the Taku River for Personal Use

We OPPOSE this proposal.

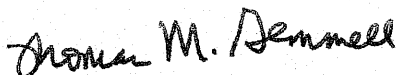
This proposal would create a new fishery on a fully allocated stock and would also be contrary to the US-Canada Treaty prohibition on the creation of new fisheries and this would create problems in the treaty process.

Those who wish to dipnet in the Juneau area have ready access to the fishery at Sweetheart Creek which is supported by DIPAC sockeye releases. The daily bag and possession limit is 25 sockeye.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

PO Box 20538, Juneau, AK 99802 (253) 237-3099 usag.alaska@gmail.com
www.akgillnet.org

February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 292. Change Gillnet Fishing Openings from Noon Sundays to 8:00AM on Monday

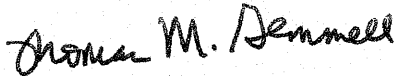
We OPPOSE this proposal.

Changing the opening day would cause disruption of business and transportation (air, barge, and ferry) routines that have been developed in the region. Many support businesses are not open on Sunday and this would complicate purchases of food, parts, and repair services.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

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February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the board:

**Re: BOF Proposal 294. Require Reporting of Commercially Caught Salmon/Steelhead
Retained for Personal Use**

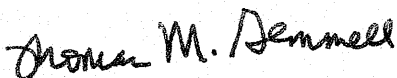
We OPPOSE this proposal.

This proposal is impractical from a commercial point of view since it would take time to find creel census staff, which may not be readily available at commercial offload sites, including tenders. In addition, ADFG creel census resources are better used providing more robust data on the recreational harvest which is "data poor" in some areas.

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Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

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Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 312. Require 10-day Mid-August Troll Closure for Conservation and Allocation Based on Midseason Assessment.

We continue to SUPPORT this proposal which we submitted.

This proposal was generated due to our concern for wild coho stocks in southeast Alaska. We believe that the department has evolved to managing the troll fishery based on allocation, and has put the burden of conservation onto the gillnet fleet. While the gillnet fleet is at their historical allocation for coho, it is important to note it is because of enhanced fish. It is important to note that the troll fleet is also slightly above its historical coho allocation.

Enhancement projects in southern southeast Alaska have made for high catches in districts 6 and 1. The high catches of enhanced fish in these two areas have precluded the department from using the 10 day closure during the summer even when wild stock cohos have not proven to be abundant. This has placed any conservation concerns for wild fish on the gillnet fleet.

Gillnet closures in upper Lynn Canal to conserve coho has kept our fleet from prosecuting a full traditional fishery on wild Chilkat River chums. These chum stocks have rebounded in recent years to the extent that many more are getting up the river than are needed for escapement. The department has only managed the Chilkat River for coho since 1987. This change in management has led to our fleet losing out on what was once a mainstay of our fall fishery.

It is doubtful that a 10-day closure will lead to drastic changes in the allocation percentages. Many of the coho not caught by the outside troll fleet would be caught by the inside troll fleet, some by the sport fishery, and maybe some by the gillnet fleet.

Not prosecuting a 10-day closure on weak wild coho return years, such as 2011, could lead to very limited or possibly no fishery in districts 11 and 15 for the gillnet fleet, both very traditional

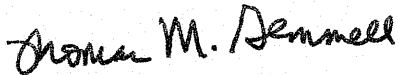
fisheries that are managed very conservatively already. Both areas have very large wild coho producing systems and large, local gillnet fleets that depend on these fall time fisheries to end their seasons.

This proposal is more about curtailing the troll effort, which is open more than any fishery in the state and which has not had the required full 10-day closure even on very weak wild coho returns. We feel all gear groups should have a share in bearing the burden of conservation. A 10-day troll closure was generally imposed in the past. The advent of significant enhanced coho abundance in a mixed stock area or outright political pressure by troll interests should not be allowed to interfere with ADFG managing trollers for wild coho escapement.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Gemmell". The signature is written in a cursive, slightly slanted style.

Thomas M Gemmell
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

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February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

**Re: BOF Proposal 284-District 11 (Taku) King Salmon Management Plan and
Proposal 320- Increase area of Section 11-A Open to trolling Taku kings**

Since District 11 has been open for directed Chinook salmon harvest in only two seasons (five days in 2006 and seven days in 2009) since the current regulations were enacted at the 2006 Board meeting, no credible claim about catch patterns relative to some prior era is possible. At the least, it is premature, and really inappropriate for trollers to return to the Board requesting more time and opportunity in District 11 on the basis of such minimal troll experience. Very little troll effort was recorded despite successful sport and gillnet harvests of Taku River Chinook during these seasons. However, basic issues regarding Chinook salmon fisheries in southeast Alaska, especially relating to the salmon treaty with Canada, are raised by this proposal. Hence, it is necessary to review important factors that argue, on the merits, against expanded, or any, troll fishing in this area.

The proposal requests 7-day-per-week access to this Chinook resource that is fully utilized in the terminal areas (District 11) by the extensive sport and gillnet user groups. The existence of Chinook salmon does not necessarily mean priority troll access.

There is currently ample troll time directly in front of the terminal transboundary river fishery utilizing large areas of District 11. This newly designed troll area was negotiated by an advisory fisheries task force for the Taku in response to the troller's request for additional Chinook harvest opportunities. The agreement was put into regulation in 2006 specifying that for every day of gillnet fishing; there would be 3 days of trolling directly in front of the terminal area, encompassing the south and north entry corridors to Taku Inlet. For every day plus one hour of gillnetting, fully five days of trolling are allowed. Saturday and Sunday fishing is prohibited for both commercial fleets in order to not interfere with local sport fisheries that primarily utilize the weekends.

There is no history of significant troll harvest of Taku River Chinook salmon in District 11 and certainly not in areas near Taku Inlet. At best troll interests claim undocumented anecdotes from some 50 years ago. The only data available on District 11 troll indicate Chinook harvests well after the May and June run timing and the directed fishery, both current and past. These limited data suggest a very small troll take after Statistical week 26 or later. Troll Chinook harvests in District 11 involved an undocumented mix of stocks that could have contained at most a trace of Taku-origin fish, as 98% of the Taku run would have already escaped up the river by this time. Virtually all troll effort and catch occurred in the extreme southern portions of Stephens Passage, particularly in the vicinities of Pt. Hugh and Holkham Bay where and when Taku-origin Chinook were highly unlikely to be present.

The assertion that trolling interests contributed substantially to the rebuilding of Taku River Chinook is empty. The directed gillnet Chinook fishery in Taku Inlet was closed for 30 years. Separately, following ratification of the Pacific Salmon Treaty with Canada in 1985, an extensive effort was undertaken to increase Chinook salmon abundance throughout southeast Alaska using existing enhancement facilities. In order to harvest Chinook production from these new enhancement projects, 31 "hatchery access" areas were created over subsequent years exclusively for spring troll fishing around the region. Five of those areas are in the migration corridor for returning Taku River Chinook. Estimates by ADFG staff indicate that roughly 1,600 Taku-origin fish are taken in these areas annually. The troll fishery has not sacrificed anything as part of the successful rebuilding of Taku River Chinook. The spring fisheries occur every year regardless of whether there are sufficient numbers to warrant directed terminal fisheries. Without regard to run strength or lack of opportunity for other user groups and without additional District 11 access for trolling, the spring "hatchery access" system has enabled trollers to harvest more Taku River Chinook salmon certainly since at least the beginning of limited entry and likely since long before that.

Any troll fishery in District 11, certainly if on a 7-day-per-week basis, would cause significant conflict with other user groups. Juneau area population roughly has tripled since the "historic" 1960's-1970's period. Sport fishing in the area arguably has increased even more with more capable vessels and the development of a charter fishery. Superimposing a troll fishery that would compete for salmon and for prime fishing locations with this active, established sport fishery is an obvious formula for resentment and confrontation. Since the gillnet fishery for Chinook is confined to the vicinity of Taku Inlet and occurs in glacially influenced waters, there is very little, if any, conflict with the sport fishery. It is unlikely that much troll effort would be directed into the limited gillnet area, but any mixing of the commercial gear types while actively fishing would generate serious conflict and likely spur violent interactions.

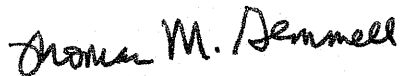
Trolling in District 11 undoubtedly would capture Chinook salmon. However, experience indicates that the sport and sport charter fisheries encounter large numbers of immature Chinook, a large proportion of which are below legal retention length. (Taku River Chinook rear in distant offshore waters, are not encountered in District 11 prior to returning to spawn, and were not caught in the winter fishery in District 11 prior to limited entry.) Increased trolling in an area with known concentrations of rearing Chinook means that significant incidental mortalities of sub-legal fish would occur. Under the Treaty, accounting for total mortalities of Chinook in a fishery, not simply for total harvest, is required. Especially in a fishery that would not provide

net benefit in harvest to the regional troll fishery and would affect other user groups negatively, increased incidental mortalities cannot be justified.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Gemmell". The signature is written in a cursive, slightly slanted style.

Thomas M Gemmell
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

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February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and members of the Board:

Re: BOF Proposal 299. Extend Commercial Closed Waters in Taku Inlet to Point Greely-Point Bishop

We OPPOSE this proposal.

This proposal would close about ½ the traditional gillnet area in Taku Inlet near Juneau.

Gillnetters would not fish “in the river” since they want to avoid grounding their vessels or hanging up their gear on the bottom. In any case, the current area boundary line is outside shallow river areas.

There is no factual basis for any of the assertions offered to support this proposal. Other information that should be considered:

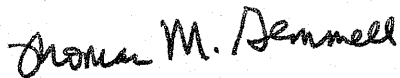
1. The Taku River continues to be the largest producer of salmon in the southeast Alaska region;
2. Salmon returns of all five species have supported the Taku Inlet drift gillnet fishery continuously for more than 100 years;
3. Since 1985 the gillnet fishery has been managed under terms of a specific harvest sharing arrangement for chinook, sockeye, and coho salmon within the Pacific Salmon Treaty (PST). A bilateral PST technical committee is dedicated to the Taku River and other trans-boundary river salmon. It is responsible for monitoring stock strengths and determining harvestable surpluses by species. ADFG and Canadian fishery managers interact throughout the fishing season to adjust harvest levels by regulating fishing time and area in order to satisfy escapement objectives;

4. ADFG fishery managers currently possess and exercise the authority to restrict gillnet fishing areas when such action is necessary in their professional judgment;
5. A regulation removing the bulk of Taku Inlet from the gillnet fishery would transfer large quantities of salmon into the Canadian fishery, not necessarily to escapement. Canadian fishery managers have asserted their right to harvest salmon surplus to escapement needs even if such harvests exceed the agreed percentage sharing arrangements within PST;
6. The glacial water of Taku Inlet is largely unsuitable for salmon sport fishing. Forcing the gillnet fleet from this area would increase conflicts with sport fishing in the outer fringes of Taku Inlet. It also would increase a safety hazard by concentrating the gillnet fleet closer to heavily used cruise ship traffic lanes;
7. The healthy seal population is what it is. Salmon escapement levels are measured after any seal predation has occurred.

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Thank you for the opportunity to comment on this proposal.

Sincerely,



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February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 313. Extend Southeast Troll Coho Season to Sep 30
BOF Proposal 314. Lengthen Troll Season Through Sep 30 in Districts 1, 6, & 8
Each Week Gillnet Open

We OPPOSE these proposals.

These proposals would extend the troll season from September 20 to September 30 with a closure by EO if warranted. We much prefer the present language that closes the season September 20 unless abundance permits a longer season by EO.

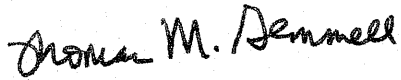
This requires the Department to make an active assessment of the fishery to determine if an extension is appropriate rather than just extending the season without proper assessment. In 10 of the past 13 years one or both districts were extended for additional trolling time. Why change the system if it already works when there is high coho abundance? It will likely be more difficult to close the fishery early during years of low coho abundance as trollers undoubtedly will put additional pressure on area biologists. Experience bears out this point with respect to the mid-season 10-day closure. Even though coho abundance and coho allocation indicators have been below ADFG standards for reducing the length of that August closure, in years such as 2011 the closed period has been shortened apparently in response to the intense lobbying for briefer, or no, closures that occurs every year.

We believe the current regulation language best protects the coho resource.

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Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Gemmell". The signature is written in a cursive style with a large, stylized 'T' and 'G'.

Thomas M Gemmell
Executive Director

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February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

**Re: BOF Proposal 317. Extend Troll Closure Date in a Portion (Neets Bay Hatchery)
Section 1-E to Sep 30**

We OPPOSE this proposal.

This is the third time this proposal has been submitted.

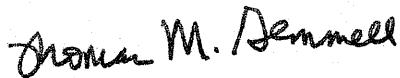
This proposal would open a portion of Behm Canal and Clarence Straight to September 30 to access coho. We OPPOSE this change for the following reasons.

- It modifies a wild stock fishery with the sole purpose of accessing hatchery fish. This is the same principal under which the Board and the Department have refused to approve changes for wild stock fisheries in order to access hatchery fish for other commercial fleets in the past.
- There are numerous wild stocks of coho in the area covered by the proposal that could be adversely impacted by the adoption of this proposal.
- The Department can extend fishing in the area by EO if the abundance of coho warrants such an extension.
- There would be no review of the potential impact on the cost recovery needs of SSRAA caused by increased interception of these coho.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

~~Thank you for the opportunity to comment on this proposal.~~

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Gemmell". The signature is written in a cursive, slightly slanted style.

Thomas M Gemmell
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

PO Box 20538, Juneau, AK 99802 (253) 237-3099 usag.alaska@gmail.com
www.akgillnet.org

February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 319. Increase Trolling in Chichagof Pass to 7 days/week to Access Anita Bay Chum
BOF Proposal 325. Redirect Spring Troll Management Plan to Target Chum Salmon to Correct Enhanced Salmon Allocation Imbalance
BOF Proposal 326. Provide a Targeted Chum Troll fishery in Section 11-A

We OPPOSE these proposals.

These are new and expanding fisheries as defined under the state of Alaska's mixed stock salmon policy 5AAC 39.220 which states that EXPANDING FISHERY, means a salmon fishery in which effective harvesting effort has recently increased significantly beyond historical levels and where the increase has not resulted from natural fluctuations in salmon abundance. The policy states that most wild Alaska salmon stocks are fully allocated to fisheries capable of harvesting available surpluses. Consequently, the board will restrict new or expanding mixed stock fisheries unless otherwise provided for by management plans or by application of the board's allocation criteria.

The board's allocation criteria that apply to these proposals are the history of each commercial gear group and the availability of alternative fishery resources. These new or expanding fisheries are proposed to be conducted in common property areas putting additional pressure on already fully allocated wild stocks.

This proposal goes against the findings of the Board of Fisheries for the enhanced allocation plan which states:

“Achieving these allocation percentage goals should not result in any modifications in time or area to the traditional "wildstock "fisheries.”

Minor modification may be considered to allow experimental or test fisheries that would not adversely impact wildstocks.

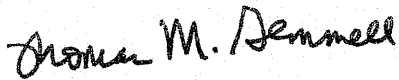
With regards, to the Chichagof Pass proposal (319) to fish Anita Bay THA chums, the trollers already have significant opportunity in area 107. ADFG is concerned about impacts on wild stocks moving through this area and this proposal would change historical fishing patterns.

USAG believes that these new and expanding fisheries will have a negative impact on wildstocks in the areas that they are proposed for, therefore putting more burdens on the net fisheries for conservation of wildstocks in our historical and traditional wildstock fisheries.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

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Dear Mr. Johnstone and Members of the Board:

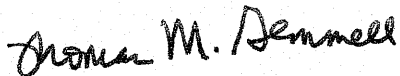
Re: BOF Proposal 328. Redefine Brood Stock Capture Gear in Districts 12 & 13
BOF Proposal 330. Close a Portion of Bear Cove in Silver Bay

We SUPPORT these proposals for the reasons given by NSRAA that they will improve brood stock recovery or safety.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

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www.akgillnet.org

February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

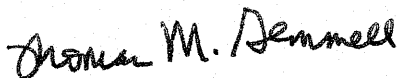
Re: BOF Proposal 339. District 7 Anita Bay THA Opening Date Change to May 1

We SUPPORT this proposal and concur with the Department's rationale; this will reduce the workload associated with issuing Emergency Orders each year.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

PO Box 20538, Juneau, AK 99802 (253) 237-3099 usag.alaska@gmail.com
www.akgillnet.org

February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 340. District 7 Anita Bay THA Open Area Change to Enhance Quality

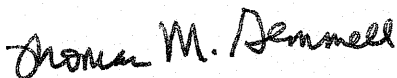
We SUPPORT this proposal since it will improve quality and better serve consumers who depend on commercial fishermen for access to the salmon resource. Quality is a key factor in salmon markets and it benefits the state government through higher ex-vessel prices and raw fish tax.

When the Anita Bay THA was created it was of utmost importance to protect the crab fleet's traditional fishing area. After returns of salmon have come back to the bay their migration patterns are better understood, as are the fishing grounds of the crab fleet. The crab fleet fishes the gradual muddy southern side of the bay, while salmon return on the northern deep rocky side of the bay. The northern side of the bay is where the net pens are located; consequently this is where returning salmon gather. Under current regulations, many salmon are allowed to mill out of reach of salmon fishermen for up to 25 days before harvest. The loss of value due to loss of quality is substantial. We have been contacted by fishermen and processors on how to correct this problem. Most of the salmon in the bay this time of year are king salmon. Gillnetters have worked closely with the crab fleet in coming up with these lines that work for all gear groups.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

PO Box 20538, Juneau, AK 99802 (253) 237-3099 usag.alaska@gmail.com
www.akgillnet.org

February 8, 2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board:

Re: BOF Proposal 342. District 12 Hidden Falls THA. Establish Registration Fishery to Replace Cost Recovery with Tax

We OPPOSE this proposal.

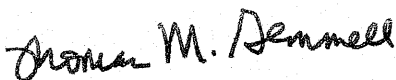
We do not believe this is a fair way to collect the tax and it likely would not generate funds to meet cost recovery needs.

This issue was raised about five years ago but no meaningful work has been done in that time to address the underlying issues. This would also put the NSRAA manager in a position of being a "cop" to enforce who is fishing and the amount of the registration fees. Additionally, this could create a conflict of interest between processors and NSRAA cost recovery that might result in lower ex-vessel prices.

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 473 drift gillnet permits in existence.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Thomas M Gemmell
Executive Director

Alaska Board of Fisheries
ATTN: BOF COMMENTS
Boards Support Section

The following are my comments on proposals 301,302,and 303. The makers of these proposals the Tsiu River Coalition are a few out of state sport fishing lodges trying to tie up a little piece of Alaska all for themselves. They are not satisfied with having the Tsiu river and a three mile wide lake system all to themselves for five days a week, They want to get ride of the gill netters on the two days that they are fishing. They simply can't stand to see other user groups in the river.

The gillnet fishery is made up of 130 local owned permits,(170 permits all to gather). The Tsiu river is extremely important to the 20 to 40 permit holders and their crews that fish there every year. The gillnet fishery has been operating their nearly 100 years. We were operating at the Tsiu when the sport fishing lodges came in set up their operations.

The fishery has been well managed through the ADF&G and the regulations in place. Healthy escapements have always been maintained. The current fishing area and the two 24hr. openings allow for an even distribution of the catch among the permit holders.

Send a message to the proposers here by voting these proposals down. Let them know that in Alaska we share resources among user groups.

Proposal 301 :

This proposal would compress the commercial fishery into a much smaller space. Placing the marker a half mile above the high tide line would cut out nearly two miles of fishing area. The fishery would lose one mile of river, plus the one half mile of beach on either side of the of the mouth. the first few sets in the river would get the lion share of the fish, leaving the rest of the permit holders with little. This would create a lot of conflict between gill net fisherman over those sets. The fishery went to the two 24hr. openings to allow the river to fill up with fish on the off day, that would make fish available for all permit holders up and down the river.

The proposal states the river is longer now and can support the change. Not true. The river mouth will move to the east gaining some length and then form a new mouth back to the west after a flood event. The river has done so 4 times in the last 30 years, the last time was in 2004.

The Hubbard glacier is once again threatening to cut off the Russell Fiord and flood the Situk river. The loss of Situk fishery will devastate the gill net fishery. Many permit holders will need to go to other rivers to fish. The Tsiu River will become more important than ever, being the second largest producer of coho in the Yakutat area.

There many places in the Tsiu for sport fisherman to go fish without gill net fishers around. Sport fishers have a 3 mile lake system, half mile above the commercial marker, plus many places in the river where commercial fishers are not fishing. All of these places have thousands of fish in them and provide excellent opportunities.

This proposal should be voted down.

Proposal 302:

This proposal would restrict the use of out boards on the Tsiu River. Fishers need their out boards to conduct the fishery. This would be impossible to enforce because fish will get scared into the nets every time the skiff approaches the net.

The proposal claims this creates a unsafe situation for sport fishers. False. Sport fishers can easily fish off of the bank of the river if they are at a set net site. There is also lots of places to fish away from a set net site. Some lodges prefer to create conflict at the river by depositing their clients on a set net site and then complaining when they operate. This proposal should be voted down.

Proposal 303:

This proposal is ridiculous. This is just one more attempted to get rid of gill net fishery. The ADF&G does a good job managing this fishery. Vote no on this proposal.

John Vale
PO Box 193
Yakutat, Ak. 99689

784-3423

RECEIVED

FEB 03 2012

BOARDS

I am very concerned about the Taku Users Group proposal to allow fishing in the Taku River for king salmon. As it stands now, fishing is allowed in parts of the Taku from June 15-April 15 for king salmon. That is a pretty lengthy season to catch the limit on king salmon allowed by ADFG. This group wants to be able to go up into a river that originates in Canada. This river is under an agreement with Canada since it is a Transboundary river.

The Taku Users Group cites that Canadian commercial fishermen may suffer just a little, and there would be some small negative effects. Their rational that the sport fishermen are being "unfairly prohibited" from fishing the Taku and being discriminated against other Alaskans is ludicrous. That is a pretty vague general statement. Their reason that sport fishing will be equitable with other fishermen and allow for a better fishing experience makes me believe that this group is composed of people that are in the charter business.

Regulation 5 AAC 47.023 that is cited is over 5 pages long and details each area of Alaska very explicitly as to catch limits, sizes, special restrictions and much more. If their proposal is adopted, who is going to police this immense river to see if all the fishermen stay in compliance with the regulations?

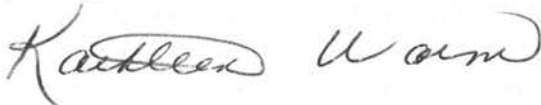
To open up the river for fishing in "fresh" water would be extremely difficult to enforce as the basic premise is that fresh water in rivers is usually based on MLL water. Obviously that is an arbitrary location dependent on the size of the tide.

The group also states that the Taku is closed while other rivers in Alaska (except Southeast) are open to sport fishing for king salmon. Those rivers westward are pretty remote and most fishermen have to fly in. The impact on king salmon is not that strong. For ADFG to allow fishing in the Taku would just let more fishermen take a little day run out to the grounds. It would not disperse the fishermen and offer a better fishing experience. It is pretty well known that if anyone is catching fish, other fishermen will target that area. Soon the better fishing experience is gone. I have seen it on the Kenai and the Gulkana where sport fishermen are shoulder to shoulder, boat to boat all trying to "catch" a king salmon. I believe that many fish would also be snagged as the runs peak.

The current regulations are put in place to keep our king salmon stock healthy and sustainable. The fact that this ADFG regulation is so lengthy only shows that ADFG is very concerned about all fisheries in all areas of Alaska.

I request that the Board not approve proposal 255 as written. It basically gives a carte blanche approach to fishing for king salmon on the Taku River.

Thank you.



KATHLEEN WARM

I am writing with the hope that you would amend 5AAC 29110 to add a section that would permit trolling in a certain area of Neets Bay to Sept. 30th.

There have been many years when ADF&G extended the coho season in various areas due to abundance and late runs. But it seems that the trollers are often below their allocation even when abundance is high

The proposed area is just a small extension of the Neets Bay hatchery section, and would not have a major impact on other fisheries as most fisheries during this time are either fishing areas that are further up north or have already "called it a season." I do not believe there would be a negative impact on many people because the proposed area is still so small.

One can not predict when cohos will return to any hatchery. Sometimes the runs are late; sometimes the fish mill around further away from the site as they stay out and feed. The fact that trollers could catch these returning fish further away from the hatchery would produce a better quality product for the consumer. They would still be a bright, healthy fish.

Trollers put in an enhancement tax to support hatcheries, and should be given the opportunity to take advantage of the various strong runs at these sites. The 10 day extension would not be that big of an impact as not all trollers would travel to that area. It would enable trollers to add a little more income should they decide to fish.

By extending the season by just 10 days would help out the smaller boats by giving them a few extra days to fish. It would help the smaller processors by giving them an extended time for processing and marketing fish. Trollers have lost the last 10 days of Sept. for coho fishing in various areas of Southeast Alaska, and have lost the first 10 days of October for fishing winter kings. Those 20 days of closure added to the other closures that are mandated during the summer have a tremendous impact of trollers' income. I ask that the board pass this resolution so the trollers may get some small benefit for contributing to the hatchery.

With the addition of this proposal, ADF&G would still have the discretion of closing or extending this area as reports of catch come in. I do not see how this amendment could be a deterrent to other gear groups.

Thank you.



KATHLEEN WARM

I have been involved in Alaska commercial trolling since 1982. During that time I have seen many changes in regulations that have been implemented by the Board of Fish. Some have been to the benefit of all gear groups; some have been to the disadvantage of different groups. At this time, I think it would not accomplish anything to approve the proposal made by Mr. Davidson.

He wants to eliminate the number of "sport" rods that would be allowed on board a hand troll vessel. I grant you that there are certain exceptions and differences in ADFG regulations for the initial king summer opening, the spring fishery, and the winter fishery. Even so, I do not believe that it is necessary to delete the section of 5 AAC 29.120 that Mr. Davidson recommends. There have to be limits on equipment for all fishermen. Even halibut subsistence fishermen have limits on the number of hooks allowed.

Should this board decide to vote in favor of this proposal, there would be no limit on how many rods could be on a hand troll vessel, much less how many could be in the water at one time. I may be pessimistic, but one could have many rods fishing at one time. It would be very difficult to police this. I could only imagine the scenario if every line had a fish on.

Most of the hand troll fishermen that I know use hand gurdies. The other "hand troll fishermen" are really sport fishermen that use a rod and reel to catch fish for the simple pleasure of the fishery. They are the ones that use a rod and reel from a skiff. There are also those "hand trollers" that fish in luxury from their comfortable boats. During all my years of trolling, I have never talked to a serious hand troller that wants to use just a rod and reel to make an income. They use their hand gurdies and just crank away. If Mr. Davidson is a hand troller that uses 4 fishing rods at a time to catch fish, I would love to see how he handles each line should they "load" up.


All gear groups have fishermen that have breakdowns or lose gear. The only options are to ask a fellow fisherman for help or go to town. I see no reason why this particular group of hand trollers that decide to use rod and reel should get a special allowance.

If this proposal had been submitted by a group of rod and reel hand trollers, I probably would support it. Because it was proposed by one gentleman, I feel that he is doing it for a very small group.

If this proposal was meant to allow the variance "in the exclusive economic zone north of the latitude of the southernmost tip of Cape Spencer", Mr. Davidson should have been more explicit. I think his proposal is just too vague.

I ask this BOF to oppose this proposal and leave the regulation as it. Mr. Davidson can again make a proposal next time around and perhaps with more support.

Thank you.


KATHLEEN WARM

I am writing in regard to proposal 312 by United Southeast Alaska Gillnetters Association (USAG).


Their issue states that the current regulation is “ambiguously applied”. As long as I can remember, ADF&G has done an excellent job monitoring coho catch for the conservation of cohos. Trollers have had various area closures of different lengths to allow for escapement. The troll closure is consistent with the coho abundance each year.

USAG said that part of the issue concerned “Inside waters fishermen are the only ones to bear the brunt...” Those trollers that choose to fish the “outside waters” would definitely be affected by the mandatory closure. A closure is a closure.

Trollers use “hook and line”. We go out just as most sport fishermen do. We look for fish and we move around if we don’t catch, and that pertains to trollers that fish “the inside waters or the ocean”. Even those “small trollers that fish the inside waters” are still not guaranteed to catch a fish. My husband has been a 100% troller since 1957. He has fished areas from Seward to Hecate Strait, various hatchery openings, inside waters and outside waters. We still fish all the areas that we are allowed. Anyhow, my premise is that we commercial trollers do what most fishermen do be they sport or personal fishermen. We use hook and line. We move around to different areas to find these fish. We have the capability to travel either in the inside waters or get out into the ocean. These marine terms are irrelevant as the weather can turn ugly anytime, anywhere. If you look at the past history of the Alaska troll fleet, we do it for the simple lifestyle it gives as we look at every fish that comes aboard. We are not in this particular fishery for the money. We are in it for the lifestyle. USAG states that the only ones to suffer from this mandatory closure are “outside water commercial troll fishermen.” How could that be when there would be a mandatory closure for all trollers? The closure would only benefit those gear groups that would be allowed to fish.

I think it is an insult for the Board of Fish to suggest that Alaska Department of Fish and Game would do any conservation and allocation action ambiguously. If you read any of the fishing periodicals, you would notice that our department is usually cited as the supreme example of how to implement actions to keep resources sustainable. I would ask that this Board of Fish vote down the proposed changes to regulation 5 AAC 29110.

Thank you.


KATHLEEN WARM

To the Board of Fish:

I fully support **proposal #247** to develop and implement a management plan to protect and enhance Juneau's roadside sport fishery. I am a resident of Juneau, AK and I am a middle school teacher with the Juneau School District. I am both a salt water and fresh water sport fisherman and I want to see the quality fishing opportunities in our area continue.

This quality includes fantastic coho and Dolly Varden fishing opportunities, but we are in danger of losing these opportunities if habitat and harvest are not monitored more closely. I believe a creel survey is essential for the roadside habitat. On the saltwater, I am surveyed several times per year by the creel survey. State troopers or Fish and Game an average of 1 time per year also board my family's boat to monitor fishing activity. I believe these same measures will make fisherman more accountable to their actions and give a baseline for future studies of the road system fishery.

As a teacher, I am also in support of a sport fishing education curriculum at the middle school level. In fact, I have witnessed many adults that could benefit from this curriculum. Respect for this resource is not inherent, it must be learned. I have witnessed people that do not know the regulations, wantonly waste meat and harass the fish. This needs to be addressed along with the preservation of habitat. Revenue could be created in the future by grooming life-long sport fishermen that will buy fishing licenses and spend money on fishing gear.

I would also like to see section C in the scope of work implemented: designate critical streams or parts thereof as designated catch and release areas. There are many areas that are hard hit by fisherman that could benefit from this, particularly, the Montana Creek confluence and the Cowee Creek bridge out the road. I do not want to see these fantastic coho runs turn into the Windfall sockeye fishery that only allows fishing one day per week with a bag limit of one fish.

Please consider implementing this proposal for the sake of future generations.

Jay Watts

Dzantik' I Heeni Middle School Teacher

Juneau, AK

ATTN: Board of Fish Comments
Boards support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Proposal 312

I have been a commercial troller since 1974, starting out as crew and later operating my own boat as I worked my way up through the ranks. I think that the passage of this proposal will reopen allocation issues that have been working towards equitable distribution of all our finfish resources. A mandatory 10 day troll closure disregards all the variations in the yearly runs, changes in hatchery success, weather and many other smaller contributions to each season. The Alaska Department of Fish and Game works hard to manage the seasons catch in a fair and equitable way by daily assessing these variables and opening and closing as needed during the season. This proposal reduces this flexibility and good management.

I am also disturbed by this proposal trying to divide "inside" and "outside" trollers. Trollers fish everywhere, and this is an unrealistic viewpoint which indicates a lack of understanding of a gear group. This is clearly a proposal that will result in the reallocation from one gear group to another. I would urge the Board to see this issue as unfair to the troll fleet and reject Proposal 312.

Respectfully,

Bonnie Westlund
F/V Dove
Box 945
Petersburg, Alaska 99833
907-518-9900

February 8, 2012

Alaska Board of Fisheries

Dear Members,

I am commenting on Proposal 310 which concerns the management of the winter troll fishery. I am in favor of adoption of Proposal 310.

I began my troll career in 1974 and continue to do so.. I have lived year round in Elfin Cove year round since 1978.

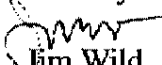
Assuming that this allocation issue is within your decision making power; I believe that under the Board's allocation criteria that this internal allocation issue within the troll fishery should be considered for economic reasons.

The Sitka Advisory Committee has stated the economic value of the winter versus summer price for a king salmon. The winter fishery is basically a fresh fish market consisting of Alaskan wild caught that have achieved a position of renown in the market place. Additional fish in the winter fishery extends this marketing strength as more fish are available in late April. Currently there are not any Alaskan troll caught fish once the winter fishery closes and the spring fisheries begin the first week of May.

The winter fishery consists of predominately Alaskan residents who bank their money in Alaska buy their fuel, gear and groceries and utilize the businesses in Alaskan communities. This is a very important economic stimulus in all the Southeast Alaskan communities.

I, like all permit holders, contribute 3% of my gross income for salmon enhancement. I believe access to hatchery fish during the winter fishery would be one of the best returns for that investment.

Thank you for your consideration on this issue and for your work as Board members.


Jim Wild
Elfin Cove, AK

ATTN: BOF COMMENTS
Boards Support Section
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

TO: B.O.F
RE:PROPOSAL 216 AND 270

I am very worried about the continued Lowering of the Chatham Black Cod Quota on Commercial Chatham permit owners. Also the escalating catch of Sablefish by the Sport Fleet and now their non sport commercial fishing gear of electric, and Hyd power.

I am 74 years old and semi-retired. Most of my Ancestors lived to their ninety's.

My Chatham Sablefish permit is my only income

No one is asking Sport fishermen to limit catch to just sablefish, when there is lingcod, salmon, rockfish, halibut, lake trout, steelhead in good supply. Sport is going home with their boxes full.

Please let me continue to enjoy my Golden Years.

Proposal 216 is just another power grab or greed

Proposal 270 sounds like a good one

Sincerely
Philip Wiley
Philip Wiley
Sitka, AK 99835

02/08/2012
Chatham Permit Holder.

February 8, 2012

203 Airport Road #A12
Sitka, Alaska 99835
(907) 738-7354

RECEIVED
FEB 09 2012
BOARDS

Board of Fisheries
Box 115526
Juneau, Alaska 99811-5526

Dear Board of Fish Members,

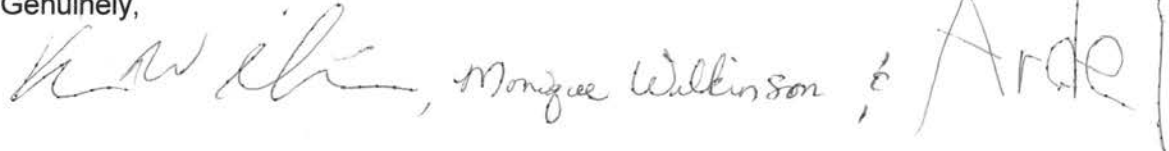
This is a letter **opposing** Proposals 217 & 221.

We are local year round residents of Sitka, Alaska. Our 40-foot commercial fishing vessel is owned and operated by our family of three. The directed lingcod fishery is important to our business, it is a fishery we depend on. We also contribute to and understand the importance of research of the stocks.

The directed lingcod fishery should not get reallocated between other commercial fishery gear groups or the sport fish division simply because there is an insatiable demand for the fish.

We appreciate your time and consideration, thank you!

Genuinely,

Handwritten signature of Ken, Monique & Ardel Wilkinson, with the name 'Ardel' written separately to the right.

Ken, Monique & Ardel Wilkinson



RYAN M. WILSON
F/V ROSHELL
PO BOX 414
SITKA, AK 99835

FEB. 2, 2012

BOF COMMENTS
BOARD SUPPORT SECTION
ALASKA DEPT OF FISH AND GAME
PO BOX 115526
JUNEAU, AK 99811-5526

RECEIVED

FEB 09 2012

BOARDS

RE: PROPOSITION #325

DEAR BOARD OF FISH,

MY NAME IS RYAN WILSON. I AM A COMMERCIAL FISHERMAN AND POWER TROLL FOR SALMON IN SOUTHEAST ALASKA, I AM A RESIDENT OF SITKA ALONG WITH MY WIFE AND TWO DAUGHTERS. PROPOSITION #325 ALLOWS THE DEPARTMENT OF FISH AND GAME TO CREATE A MANAGEMENT PLAN FOR THE HARVEST OF CHUM SALMON DURING THE MONTH OF JUNE IN ICY STRAIT AND PART OF NORTHERN CHATHAM STRAIT. CURRENTLY WE ARE TARGETING CHUMS DURING THE SPRING KING SALMON HATCHERY OPENINGS WHICH ALLOW THE RETENSION OF KING, CHUM AND PINK SALMON UNTIL A MAXIMUM NUMBER OF TREATY KINGS ARE HARVESTED OR UNTIL THE GENERAL SUMMER TROLL SEASON BEGINS WHICHEVER COMES FIRST. IF THIS CAP OF TREATY KINGS IS REACHED, THAT SUB-AREA IS CLOSED FOR THE REMAINDER OF THE SPRING FISHING SEASON, WITH A CHUM SALMON MANAGEMENT PLAN IN PLACE, THESE AREAS COULD BE LEFT OPEN BY THE DEPARTMENT FOR THE HARVEST OF CHUM SALMON WITH A NON-RETENSION OF KING SALMON.

PLEASE VOTE YES ON PROPOSITION #325 AND ALLOW TROLLERS AN OPPORTUNITY TO HAVE A FINANCIALLY VIABLE CHUM SALMON FISHERY DURING THE MONTH OF JUNE

RESPECTFULLY,

RYAN M. WILSON
F/V ROSHELL

RYAN M. WILSON
F/V ROSHELL
PO BOX 414
SITKA, AK 99835

FEB 2, 2012

BOF COMMENTS

BOARD SUPPORT SECTION
ALASKA DEPT OF FISH AND GAME
PO BOX 115526
JUNEAU, AK 99811-5526

RE: PROPOSAL #326

DEAR BOARD OF FISH MEMBERS,

MY NAME IS RYAN WILSON, I AM A COMMERCIAL FISHERMAN AND POWER TROLL FOR SALMON IN SOUTHEAST ALASKA, I AM A RESIDENT OF SITKA ALONG WITH MY WIFE AND TWO DAUGHTERS,

PROPOSAL #326 WILL ALLOW TROLLERS TO TARGET DIPAC CHUMS NEAR THE TERMINAL AREA ADJACENT TO AMALGA HARBOR JUST NORTH OF JUNEAU. FROM MY EXPERIENCE FISHING FOR CHUM SALMON AT NEETS BAY NEAR KETCHIKAN AND IN SITKA SOUND, MY CATCH RATE IS SIGNIFICANTLY HIGHER WHEN FISHING NEAR TERMINAL AREAS, WHEN THE FISH NEAR THEIR TERMINAL AREA, THEY TEND TO CONCENTRATE IN LARGE SCHOOLS AND MILL AROUND MAKING THEM MUCH EASIER TO CATCH, THIS IS WHY I AM INTERESTED IN FISHING THIS AREA.

IT IS MY UNDERSTANDING DIPAC HAS NOW PAID OFF ITS DEBT. CURRENTLY SEINERS ARE NOT ALLOWED TO FISH NORTH OF HAWK INLET IN CHATHAM STRAIT / LYNN CANAL, GILL NETTERS FISHING IN LYNN CANAL ARE MANAGED AROUND A BY-CATCH LIMIT OF CHILKOOT AND CHILKAT SOCKEYE AND ARE LIMITED ON THE AMOUNT OF TIME THEY CAN FISH, THEREFORE, THE NET GEAR GROUPS ARE NOT ABLE TO CATCH ALL THESE FISH, MOST DIPAC CHUMS WILL HAVE TO BE CAUGHT AS EXCESS COST RECOVERY RESULTING IN MILLIONS OF DOLLARS OF EXCESS REVENUE TO A NON-PROFIT HATCHERY.

PLEASE VOTE YES ON PROPOSITION #326 AND ALLOW TROLLERS AN INCREASED OPPORTUNITY TO HARVEST DIPAC CHUM SALMON

RESPECTFULLY,
RYAN M. WILSON
F/V ROSHELL

Al Wilson
P.O. Box 597, Sitka, Alaska 99835
(907) 747-5165 or (907) 738-1894
Email: berryisl@gci.net

ATTN: BOF COMMENTS
Board Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

February 9, 2012

Total Pages: 6

Proposal 230 – I support this proposal.

This proposal in large part is to change the management of the Sitka Sound sac roe herring fishery from a single species fisheries management system to an eco-system-based fisheries management system. The best way to do this is to add Pacific herring to the Alaska statute 5 AAC 39.212., Forage Fish Management Plan, FFMP that governs the commercial harvesting of forage fish species in the waters of Alaska. The nine species presently listed as “forage fish” in the statute do not include Pacific herring although herring appears to meet all the criteria listed for forage fish. All known fisheries management entities, be it state, federal, regional councils, or their foreign counterparts, with exception of Alaska, classify herring as a forage fish species. Further, the Alaska Board of Fish, BOF, has proclaimed the Alaska Department of Fish and Game, ADF&G, will manage the fisheries on a scientific basis. It would seem nothing could be clearer that the Pacific herring should be included in the FFMP. The FFMP states forage fish may be commercially taken as provided for in 5 AAC 03 – 5 AAC-39. An existing statute, if included therein, or a newly drafted statute would allow commercial harvest of Pacific herring to continue as is being done now. The listing of Pacific herring as a forage fish would require the ADF&G to expand the area used to assess and forecast the health of herring populations and how this may be affecting all fishery groups. The ADF&G would have more responsibility to protect herring when considering approval of such things as: the number and location of hatchery fry releases, new aquaculture permits, the location of any new processing plants or any facility that may dump untreated waste products in waters identified as herring rearing habitat. All user groups would be brought to the table when ADF&G makes their report on the stock assessment and forecast of herring populations. The ground fishermen and troll fishermen, in particular, have long complained that the size of the average same age fish landed is becoming smaller every year and subsistence gatherers and fishermen say several years have occurred where their needs have not been met. These user groups have hard data to back up what they say.

Presently, the herring resource in Sitka Sound is being managed by ADF&G as a single species fishery to provide maximum harvest levels for the sac roe herring seine permit holders. The department focus is entirely on a small harvest area and does not appear to include anything else that may be affecting herring or other species. For example, the ASA model the department uses to determine the gross harvest level does not show

where the two to three year old immature herring have been or come from except to know that they have always showed up. They say the cost of a study to learn the health and whereabouts of the immature herring is beyond the scope and budgetary means of this fishery. What is wrong with this, aside from basing their findings on incomplete data, is that they will not be aware of any problem that may exist until the immature herring do not show up then it may be too late to save the herring resource. Added to this are many things that negatively impact herring populations such as: marked increases in whale population and corresponding predation; enormous increases in hatchery releases of salmon fry that not only feed on herring larvae but compete with herring for the same food; hatcheries and fish processing plants are being placed in the very deep inlets and bays in which herring are reared and the hatcheries dump untreated waste including chemicals in the water while the processing plants dump thousands of pounds of untreated fish waste into the water. The fish waste brings into the bay scrap fish that were never there in those amounts before. The dumping of the fish waste is seasonal and what will the scrap fish feed on in the off season I wonder. In face of this ADF&G says survival rate of herring is increasing. In the Stock Assessment and 2010 Forecast, Sitka Sound, Alaska, Sherri Dressel states that from 1980 to 1998 there was a survival rate of 60% and from 1999 to 2009 there was a survival rate of 87%. Some would say I am being too polite but it would seem this is the result of a single species fisheries management plan as opposed to an ecosystem-based fisheries management plan. Much of what is stated above has been said time and again by fishermen and subsistence users based on personal findings and actual experience. These findings are now being verified and formalized by scientific study and being published. I have attached condensed parts of one of these reports and also a copy of news media on statements made by a noted biologist on the impact of herring recovery by whale predation. The attached reports concern herring in Prince William Sound but the conditions and effect of what they say are identical here in Southeast Alaska.

Although there is much to be done before the BOF completes deliberations on all of the proposals brought before them, they are nonetheless ominous. The substantial increase in herring GHL will have the effect of extending the fishery season into the time subsistence harvest is at its peak. Shorter and shallower seine nets will allow the permit holders to fish on the beach hitting the herring when the roe content is highest and most valuable. Not so would cry the ADF&G saying you could not have an opening for 50 plus boats in this manner. But take that in hand with a cooperative fishery and I think we are seeing the last of a reasonable opportunity for a subsistence harvest to occur or worse. Hopefully, the BOF will see their way clear to consider our needs.

Al Wilson

Attachments: 4 pages

adn.com

Anchorage Daily News

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Experts: Food for Pacific salmon may run short

COMPETITION: Hatchery and wild fish often use the same feeding grounds.

By LES BLUMENTHAL
McClatchy Newspapers

(11/29/10 21:21:55)

WASHINGTON -- With the number of salmon spending part of their lives in the North Pacific having doubled in the past 50 years, scientists are increasingly concerned there may not be enough food in the ocean to support them, and changing climate could make it even worse.

At first blush, the mounting scientific evidence would seem to contradict conventional wisdom that salmon are a disappearing species. But, as with everything salmon, it's more complicated.

While more than \$13 billion has been spent since 1978 to try to restore endangered wild salmon populations in the Pacific Northwest, salmon hatcheries in the U.S., Russia, Japan and Canada have also expanded rapidly.

In 1970, 500 million hatchery-raised salmon were released. In 2008, more than 5 billion hatchery fish headed out to sea. As with wild salmon, only a small percentage of the hatchery fish actually survive to spawn.

Once in the ocean, the hatchery fish are competing for the same food as the wild salmon. While the North Pacific and the Bering Sea may be vast, salmon often congregate in the same feeding grounds.

"Many hatcheries were built on the premise that the ocean had an unlimited capacity to support all salmon," said Gregory Ruggerone, a fisheries scientist who works for Natural Resources Consultants in Seattle.

That may not be true. With nearly 650 million adult Pacific salmon swimming in the ocean at any given time, the competition for food is increasing and the already shrinking wild stocks could be crowded out.

"It could lead to a reduction in wild stocks," said Randall Peterman, a professor in the School of Resource and Environment Management at Simon Fraser University in Burnaby, British Columbia.

Studies over the past several years suggest competition for food is affecting salmon runs up and down the West Coast, from Puget Sound kings to Alaska's Bristol Bay reds. In some instances, the fish are smaller when they return, making them more susceptible to predators. In others, runs are actually declining.

The competition between wild and hatchery salmon is nothing new. Wild salmon are considered heartier and more resistant to disease than their hatchery-raised counterparts.

"We know stocks from all over the Pacific intermingle and overlap," Ruggerone said. "There is a melting pot. But there is a lot we don't know."

The issue of too many salmon and too little food is an international one, with Japanese hatcheries releasing mostly chums, which are valuable for their roe, and the Russians releasing pinks.

"Five years ago at a conference in Russia, a guy stood up and said I was trying to start a war between Russia and the U.S.," Ruggerone said.

Since the mid-1970s, the waters of the North Pacific have been slightly warmer, creating an upwelling that brings zooplankton, krill and other salmon food favorites to the surface. But a 20- to 30-year weather cycle known as the Pacific Decadal Oscillation could soon reverse itself, and colder water means less food for the salmon.

Climate change is causing even greater uncertainty.

"This concern about competing for limited resources may become considerably more acute if the North Pacific area occupied by salmon decreases due to climatic change," according to an article co-authored by Ruggerone and Peterman published this fall in a technical journal published by the American Fisheries Society.

The article talks about a "common pool" of salmon food in the North Pacific and suggests hatchery fish have become so abundant that there may not be enough food for the wild fish.

Despite years of study, salmon remain pretty much mystery fish when it comes to the time they spend in the ocean. While much is known about the time they spend in fresh water and their journey down rivers and streams to the sea, once they enter salt water they pretty much disappear for up to three years, only to return to fresh water to spawn.

Pinks, the most abundant type of salmon, could be the main culprit when it comes to competition for food. While some juvenile salmon stocks linger in fresh water for a year or more, pinks rush to the ocean where they have first crack at the food and return a year later to spawn.

Scientists know Pacific salmon can migrate thousands of miles once they enter the ocean. Studies of fish that had been tagged at the hatcheries and later caught have shown the fish are capable of traveling remarkable distances. But most of the studies date to the 1960s and 1970s, and scientists now want to use genetic testing to better track their journeys to the North Pacific feeding grounds.

"We have some idea what is going on but there is a lot we don't know," Ruggerone said.

During the past several years, Ruggerone said, one West Coast salmon run had roughly three times as many fish return as expected and only a tenth of the fish expected in another run showed up. No one knows why.

"The thing about science is every answer generates 10 more questions," Ruggerone said.

Print Page Close Window

REVIEWS

Hypotheses concerning the decline and poor recovery of Pacific herring in Prince William Sound, Alaska

Walter H. Pearson · Richard B. Deriso ·
Ralph A. Elston · Sharon E. Hook ·
Keith R. Parker · Jack W. Anderson

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Abstract This paper updates previous reviews of the 1993 stock decline of Pacific herring (*Clupea pallasii*) in Prince William Sound, Alaska, and focuses on hypotheses about subsequent poor recovery. Recent age structured assessment modeling with covariate analysis indicates that the population dynamics of the sound's herring are influenced by oceanic factors, nutrition, and, most substantially, hatchery releases of juvenile pink salmon. For the

1993 decline, poor nutrition remains the most probable cause with disease a secondary response. Concerning poor recovery, we examined 16 potential factors and found three to be causal: oceanic factors, poor nutrition, and hatchery releases of juvenile pink salmon. Absences of strong year classes at both Sitka and Prince William Sound after 1993 indicate the action of large-scale ocean processes. Beyond regional-scale environmental factors, two factors specific to the sound influence the population dynamics of herring and are likely impeding recovery. First, pink salmon fry releases have increased to about 600 million annually and may disrupt feeding in young herring, which require adequate nutrition for growth and overwintering survival. Juvenile pink salmon and age-1 herring co-occur in nearshore areas of bays in late spring and summer, and available data on dietary overlap indicates potential competition between the age-1 juvenile herring and juvenile pink salmon. Field studies demonstrate that juvenile herring reduce food intake substantially in the presence of juvenile pink salmon. Second, overwintering humpback whales may consume potentially large amounts of adult herring, but further studies must confirm to what extent whale predation reduces herring biomass.

Keywords Pacific herring · *Clupea pallasii* · Fisheries collapse · Fisheries recovery · Prince William Sound · Alaska · Exxon Valdez oil spill

Jack W. Anderson—Deceased.

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Published online: 29 May 2011

 Springer

require ongoing studies of whale abundance and predation to be completed over a sufficient number of years to provide reliable long-term information.

Improving nutrition among overwintering juvenile herring clearly would be beneficial to PWS herring recruitment, but how to do so on a scale that would be effective is not immediately obvious. One approach may be to switch the timing of hatchery pink salmon fry release from the peak of plankton production to smaller releases over a longer time period. Reduction in the total amount of releases may also be effective in preventing juvenile pink salmon from depleting any zooplankton stocks that also benefit juvenile herring. If ocean survival of juvenile and adult salmon is the main factor governing the magnitude of returns, then an evenly timed release or even a reduced total release may not have a great influence on the overall returns of adult pink salmon to PWS.

In their review of the lessons learned from the collapse and recovery of North Sea herring, Dickey-Collas et al. (2010) call for not only more research on the mechanisms for collapse and recovery but also for a move away from single-species management approaches to multispecies management and, in the long term, to ecosystem management. When commitments to the management of several species are in conflict (which appears to be the case with PWS), reconciling the conflicting commitments will be best done at the ecosystem level (Dickey-Collas et al. 2010).

Conclusions

We have assessed the evidence for and against the principal decline and poor recovery hypotheses and find no evidence that oil exposure from the *Exxon Valdez* oil spill, harvest effects, spawning habitat loss, the spawn-on-kelp fishery, or disease have led to either the decline or poor recovery of PWS herring.

Our re-examination of available information and recent modeling outcomes supports earlier conclusions (Pearson et al. 1999) that poor nutrition is the probable cause of the 1993 decline. Nutritional status of PWS herring clearly began to decline in the mid-1980s and reached a low in 1993 and was associated with low zooplankton abundance. Recent information, especially the disease analysis of Elston and Meyers (2009), decreases the role of disease in the

decline. The evidence supports the contention that disease during the decline was a secondary response after a portion of the PWS herring population was stressed by poor nutrition.

Poor recovery probably results from several factors. Since 1993, no strong year classes have emerged in the GOA herring populations, including that at PWS. This lack of strong year classes appears to derive from regional-scale ocean environmental factors. Beyond the regional-scale factors, two other factors specific to PWS appear to be reducing herring biomass and recruitment. First, predation by an increasing number of overwintering humpback whales may prove to be removing a substantial proportion of the adult herring in PWS. Second, interactions with juvenile pink salmon released from PWS hatcheries may be influencing nutrition in juvenile herring and their subsequent growth, survival, and recruitment. Continued research is recommended on PWS humpback whale predation and on herring recruitment processes. Also recommended is a move away from single-species management to multi-species management, if not to the management of PWS as a whole ecosystem.

Acknowledgments We thank Michael Anderson, Michael Cobb, Lee Miller, Ann Skillman, Kathryn Sobocinski, and John Southard of Battelle Marine Sciences Laboratory in Sequim, Washington, and Karen Humphrey of Aquatechnics, for their dedicated efforts in compiling and presenting the information in this review. We thank Mark N. Maunder of Quantitative Resource Assessment LLC for his modeling aid in this effort. We thank Lawrence L. Moulton of MJM Research for sharing his raw data on the co-occurrence of pink salmon and herring in his tow net samples. We thank Kenneth A. Rose of Louisiana State University and John R. Skalski of the University of Washington for valuable discussions and for reviewing an earlier version of this paper. We also thank Douglas E. Hay of Nearshore Consulting for reviewing earlier manuscripts. Exxon Mobil Corporation supported this effort.

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Appendix: Sources for Unpublished Data from Alaska Department of Fish and Game

See Table 13.

Max Worhatch IV
P.O. Box 407
Petersburg, AK 99833
(253)279-0707

2/9/2012

Mr. Karl Johnstone
Chair, Alaska Board of Fisheries
c/o Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Johnstone and Members of the Board-

My name is Max Worhatch IV. I have lived in Petersburg most of my life. I feel fortunate and proud to make my living commercial fishing. I participate in a variety of fisheries, as most full time fishermen do. I am also the Vice-President of United Southeast Alaska Gillnetters, and I serve on the Petersburg Advisory Committee to the Boards of Fish and Game. Today, instead of preparing for a Tanner crab fishery, I will be commenting on various proposals before the board. I will try to be as concise and brief as possible. These views are my own.

Proposal 269- I support. Data is always good. A mandatory report card for sport, personal use, and subsistence would be a very good thing. Liberal bag limits and accessibility of resources make it impossible for the department of fish and game to have any idea what the takes are. On one hand the department says they are confident in their creel survey, but when pressed for numbers, they say they haven't enough data. At the Petersburg Shellfish meeting in January, in a discussion about closing sport Dungeness in areas closed to commercial Dungeness, Bill Brown said that 1% of the total catch of Dungeness was sport. I have to challenge that percentage. Where did he get it? There is no hard number anywhere, because there is no data. If members of the board do not have good data, they cannot make educated decisions. I don't mean to single out Mr. Brown, but I remember wondering where he got a number like that when we had just been discussing proposal 140, a similar proposal concerning shellfish. If the board will not adopt this proposal, I would request at least a directive, or something along those lines. It would be very hard to ask the legislature to fund this without that.

Proposal 299- I am opposed to this proposal. This is a very viable and important fishing area for the gillnet fleet. There is no escapement problems on this river. ADFG manages this fishery very conservatively and has had no problems making escapement goals. Proposers claims of escapement problems are unfounded.

Proposal 311- I am opposed to this proposal. Trollers are already at their allocation for coho. To allow them to retain for another two weeks could put them over their allocation and take coho from gillnetters. Early run hatchery coho are mature, high value fish. Many coho caught would not be of high value, but would be later in their life cycle. If this proposal were area specific, it would have some merit. As written, it could cause problems to wild stocks.

Proposal 312- I support this proposal. There is a concern amongst the gillnet fleet that we are left holding the bag for conservation of wild coho stocks. We believe that the ADFG has evolved to

managing coho to an allocation and ignoring escapement needs when managing the troll fleet. This is particularly true in districts 11 and 15. Both these areas are traditional and important fisheries to residents of Juneau and Haines. The fall fishery in upper Lynn Canal has had a change in management strategy since 1987. Prior to that, management was for chums. With the management switch, we are unable to fully utilize what was once the mainstay of our fishery, which was Chilkat river chums. We do understand weak stock management, but we feel the trollers should share some of that burden.

Proposal 313- I am opposed to this proposal. The troll season is the longest season for salmon in the state. In high abundance coho years, they may only be closed for as little as 12 days in a calendar year. The department already regularly extends the season by emergency order. This proposal would call for emergency order to close it. Not needed.

Proposal 314- I am opposed to this also. The troll fleet fishes all summer, with minimal closures, even in weak wild stock years. To allow them even more time to kill what is left of wild cohos would be ludicrous.

Proposal 315- I am opposed. The troll fleet has access to these fish seven days a week all summer long.

Proposal 316- I am opposed. See above.

Proposal 317- I am opposed. High incidents of wild coho travel through this area. The September 20th closure was set to protect late run escapements of coho. To remove this date to harvest enhanced fish would be against ADFG's policy of management of wild stocks.

Proposal 319- I am opposed. Opening experimental areas for troll chum harvests could lead to wild stock interceptions. These are stocks that are fully utilized and managed for. Net fleets could lose traditional time due to wild stock interceptions by the troll fleet. Areas for enhanced chum harvests should be either in or very adjacent to terminal areas to minimize wild harvest.

Proposal 320- I am opposed. The troll fleet has plenty of access to Taku river kings in their enhanced access openings. They fish these areas when the Taku River has little or no allowable catch. The gillnet fleet bore the major burden of conservation of rebuilding this run by being closed for 30 years. The trollers caught Taku River kings in their general fishery all those years. The low catch rates indicated in the proposal were due mostly to lack of participation. Most trollers were fishing the enhanced access areas by their choice.

Proposal 284- I am opposed. See above.

Proposal 325- I am opposed. Again, enhanced chums need to be fished adjacent to terminal areas. Wild chums and sockeye may be intercepted in this fishery. These wild fish are fully allocated, and the net fleet and the net fleet alone is managed for their sustainability. To risk these wild stocks to stand by an allocation plan that is in many peoples opinion broken would, again, go against everything the department manages for. There is also anecdotal information of high catch rates of juvenile out-migrating king salmon on chum gear. The department needs to observe in this area to determine if there are problems with this.

Proposal 326- I am opposed. Mostly for the reasons stated above. If there were juvenile king salmon caught in this area, they would undoubtedly be Taku River kings. It is important to note that while

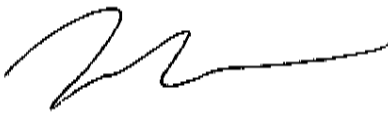
there is gillnetting immediately north of the proposed area, our fleet is being managed for wild sockeye, not chums.

Proposal 340- I am in support. This proposal generated from the Wrangell AC is a shining example of how a group of people can work together to make something work for all parties. There was a lot of effort between the gear groups to accommodate all users of the bay, and to extract the maximum value out of these enhanced fish. This is a winner for everyone.

Proposal 292- I support. I want to start in the morning. I could care less what day. I hate to waste daylight.

That's all I have for you guys today. Thanks for your consideration.

Max Worhatch IV

A handwritten signature in black ink, appearing to be 'Max Worhatch IV', with a stylized, flowing script.



Yakutat Salmon Board
City & Borough of Yakutat
PO Box 160 Yakutat, AK 99689

Phone: (907) 784-3329
Fax: (907) 784-3481
yakutat_salmon_board@yahoo.com

December 28, 2011

Re: Tsiu River Proposals Submitted to the Board of Fish

Proposal #'s 301, 302, 303

This is a general position letter representing the views of the Yakutat Salmon Board, an advisory board to the City and Borough of Yakutat Assembly.

Proposal 301: Close certain portions of the Tsiu River to commercial fishing.

Separating user groups on the Tsiu River is unnecessary. This will decrease opportunities for both commercial and sport interests. The river is very dynamic and may lengthen or shorten on any given year therefore, setting arbitrary lines, would create more problems than it will solve over time. Most sport fishing anglers intermix with the existing commercial fishery without incident. It is also common for weather and escapement counts to restrict the commercial set net fishery to two days per week, leaving the entire river open for sport angling access for five days.

In 2009, the CBY planning staff completed a Land and Fisheries Management Summary Report for and a River Etiquette Guide for users. Neither the guides nor the fishermen would sign the River Etiquette Guide due to the distrust between the groups. This distrust comes from constant attacks on the commercial fishing industry through the BOF process by a few individuals.

The borough planner fields several complaints over the phone each season and the majority are guides fighting with each other due to angler overcrowding. In addition the borough has initiated a cabin permitting system to begin in 2012 in order to clean up derelict camps and create a more aesthetic atmosphere for all users of the river.



Yakutat Salmon Board
City & Borough of Yakutat
PO Box 160 Yakutat, AK 99689

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yakutat_salmon_board@yahoo.com

Contrary to the economic statements made by the Tsiu River Coalition the financial benefits to the community of Yakutat are myriad. The economic activity includes air taxis, freight planes, cannery workers, fishermen, and the value of 400K pounds of coho on the world market. Though commercial fishing tax revenues are small when measured directly against sport angling taxes and lease payments, they are substantial when looked upon as an aggregate. Many years the Tsiu River has produced coho when the rest of the Yakutat District has not. This can make or break the cannery operator which is the largest single private employer in the borough. In the commercial fish business some years produce very small margins.

The borough wishes to see both a strong sport industry and a strong commercial fishery on the Tsiu River. We believe it is time for all the user groups to sign the river etiquette document and begin living by it. Before the loss of the Alaska Coastal Management Program the borough was considering an AMSA or an Area Meriting Special Attention. This would have allowed stronger management measures to be undertaken by borough staff in dealing with user conflicts.

We oppose proposal 301

Proposal 302: Prohibit the use of power boats to drive fish into nets on the Tsiu River.

Typically, one or two passes are sufficient to chase a school of fish into a gillnet. Then the motor is turned off to pick fish from the net. It is an efficient way to quickly capture fish and get them into iced totes. The practice has occurred for as long as motors have been on the river. The lower Tsiu River is full of boats and ATV traffic, airplanes hauling fish and transporting sport anglers. Sport Anglers travel across anadromous streams and lakes scaring flocks of ducks and swans, then through beach dunes routing resting cranes and geese and tearing beach vegetation. In short, the area is a center of commerce and the amount of noise and wear and tear on the environment is bearable. The winds wipe away most signs of ATV presence and the duration of the coho season is such that the area is left along for 9-10 months out of the year.

We oppose Proposal 302



Yakutat Salmon Board
City & Borough of Yakutat
PO Box 160 Yakutat, AK 99689

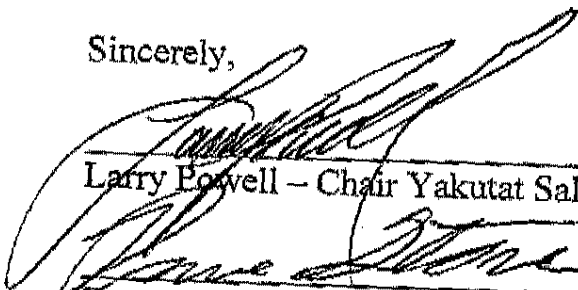
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Fax: (907) 784-3481
yakutat_salmon_board@yahoo.com

Proposal 303: Establish new criteria for determining commercial fishing
openers.


The Tsiu River has consistently produced incredible amounts of coho salmon. We regard this as proof that the existing management plan is adequate to protect the stocks. We feel ADF&G is doing their job.

We oppose proposal 303

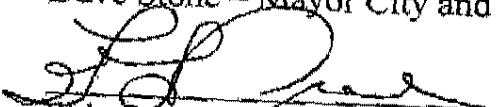
Sincerely,



Larry Powell – Chair Yakutat Salmon Board



Dave Stone – Mayor City and Borough of Yakutat



Skip Ryman – City Manager

ATTN: BOF
COMMENTS
Boards Support Section
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Chairman Johnstone and Board members,

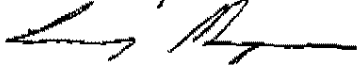

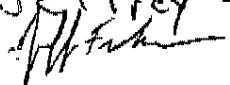
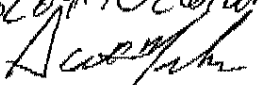
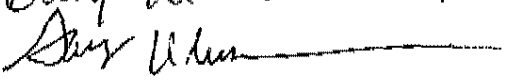
Thank you for the opportunity to address the board in support of proposal # 310. This proposal seeks to discount Alaska Hatchery King Salmon from the overall winter King Salmon quota that they were caught during. Alaska hatchery fish should not count against the treaty quota, and on average this amounts to around 4,000-5,000, but instead of not counting against the winter fishery, these fish are added on to the summer fishery.

First, this is just wrong. Fish should be accounted for when you caught them, period. Second, the argument that moving these fish back to the winter fishery will jeopardize the 10 day total per summer king salmon mortality / number of coho days is wrong. Wrong because those who use this argument are pointing in the wrong direction for a shortage of summer king quota. It wasn't the winter fishermen who slashed the summer quota. It wasn't the winter fishermen who wrongfully withheld the 50,000 king salmon total mortality implementation that Alaska was supposed to receive according to language in the treaty it's self, but was reneged upon. The troll fleet needs the ability to make adjustments to meet market trends, and seasonal fluctuations the way other fisheries have recently. All we want is for fish to be accounted for when they were actually caught.

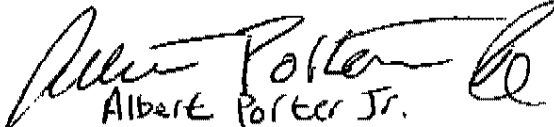
The price for troll caught King salmon is usually double in the winter what it is in the summer, it makes good fiscal sense to the troll fleet as a whole to credit Alaska Hatchery fish harvested in the winter to the winter fishery. In the overall scope of the summer quota, 5,000 fish is a pretty small amount. In most cases it won't even add an extra day to the summer season. In the winter season however, it could make a big difference. 5,000 fish could mean an extra week of fishing time.

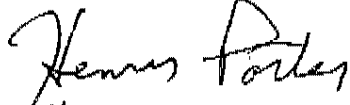
Lastly, it is simply wrong to look at it like there are 2 distinctly different groups of fishermen here, we are all trollers. All of our permits are good in both the summer, and the winter fisheries. Decisions should be made based on what is best for the fleet as a whole, not best for those who only want to fish in the summer time.


Sincerely,

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Sam Johnson.
- 10) Gary Klushkan Power troll & Hand troll
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- 11) Reginald Rukovich, Rukovich Hand Troll
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- 12) Lowell Petersen Box 62 Yakutat AK. 99689
Hand troll Lowell Petersen


13) DAVE STONE D and Jim Hand troll
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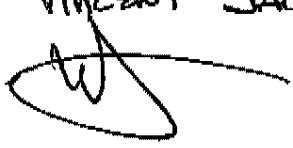

31) ~~James Nelson~~ JAMES NELSON H TROLL
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34) Sam L. Demmert BX 369 784-3497
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35) OLIVER, HOKANSON BX 95 784-3482
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- 36) Vincent JACOBSON P.O. Box 28
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- 39) Andrew & GRAY Box 91 YAKUTAT
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- 40) DEAN C FIRESTACK Box 258
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- 41) LEO LEWIS YAKUTAT AK. HAND TROLL
- 42) JAMES HOLCOLM power TROLL 784-3240
- 43) NICOLAS HOLCOLM power TROLL YAKUTAT AK.
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- 45) LES HOLCOLM HAND TROLL
- 46) :
- 47)
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Yakutat Tlingit Tribe

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Phone (907) 784-3238 * Fax (907) 784-3595 * www.ytttribe.org



February 8th, 2012

Attn: BOF Comments
Board Support Section ADFG
Box 115526
Juneau, AK 99811-5526

Dear Chairman & Board Members

Subject: Yakutat Fishing Proposals

Proposal 267: We neither Oppose or Support this proposal, because we are not sure if you understand that there is no designated area for fishing in this lake. Our concern is safety to the people trying to fish out of that lake. We believe that there needs to be more of an assessment of the lake and its location.

Proposal 281-83 and 300: We support this proposal as would benefit our fishing community.

Proposal 301: Opposing this Proposal, we support the letter Comments from Greg Inderland owner of Yakutat Seafoods. We have long standing traditions of fishing the mouth of the Tsui and sometime the breakers. Generations of families have fished this land, longer then sport fisherman have visited our fishing grounds. The Tsui fishing industry supports our families in our community and can coexist with sport fisherman. This proposal would better if was held in a open public hearing for all of the Yakutat Community; fisherman, families and organizations, to attend and make their comments of how this will effect the Tsiu Commercial Fishing.

Proposal 302: Opposing the proposal because this has been working for years, the regulation now is sufficient to our ways and with changing this it would cause more conflict and lead to openers based on over escapement.

Proposal 303: Opposing, this does not fit what we believe would be a good choice in change. It makes since that the ratio of the male and female stay 50/50. If this is passed there would be more female then males in the river.

Proposal 305: We oppose this because the Yakutat set net will lose some lower sets in the Akwe River. The river is small as it is, this will make less set net locations.

Proposal 321: We support having more of an informational meeting on this issue, due to not enough facts and info provided.

MISSION To preserve, maintain and protect the unique culture, land & resources of Yakutat Tlingit people;
to maximize our social, health & well-being while creating economic development benefits to all tribal members.



Yakutat Tlingit Tribe

As an local supporting organization we believe that these issues be brought to the communities attention. Giving knowledge to the changes and disruption to our community life style, these really should be discussed in a public hearing at our local hall. We encourage communication and working together and we offer our support to hold the meetings to inform our community on issues or changes that will effect our environment, lifestyles and future. Please consider this partnership, we are willing to lead the meetings.

Sincerely,

Victoria Demmert
Yakutat Tlingit Tribe President

From: [Andrew Couch](#)
To: [Stone, Shannon C. \(DFG\)](#)
Subject: PC149 -- Andy Couch Letter For Board of Fisheries Attention
Date: Tuesday, February 14, 2012 3:07:13 PM

Andrew Couch, owner
Fishtale River Guides
PO Box 155
Palmer, AK 99645
907-746-2199

January 11, 2012

Attention: Regional Supervisors James Hasbrouck and Tracy Lingnau
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, AK 99518-1599

Dear James and Tracy,

In consideration of Northern Cook Inlet king salmon spawning escapement shortfalls and possible 2012 sport and commercial fisheries restrictions discussed by Alaska Department of Fish and Game (ADF&G) staff during a fall 2011 public meeting at the Wasilla Legislative Information Office, I have compiled information from ADF&G data and other sources that provides a more comprehensive view of these issues. Most of this letter provides background information, but in Requested Actions, I've listed 10 specific recommendations to the Department on how Susitna River drainage and Little Susitna River king salmon stocks may be better managed to ensure more consistent attainment of king salmon escapement goals, while maintaining both sport and commercial harvest opportunities, and economic benefit. Please share, discuss and consider the information and recommendations as the Department formulates Northern Cook Inlet king salmon management direction for the 2012 fishing seasons.

2012 Susitna River King Salmon and Possible Emergency Regulation Changes

Downturns in Northern Cook Inlet King Salmon Production

Although a few streams experienced earlier difficulties achieving Alaska Department of Fish and Game (ADF&G) king salmon spawning escapement goals, a widespread downturn in Northern Cook Inlet king salmon spawner escapement levels started in 2007 when Chuitna River, Lewis River, Theodore Creek, Alexander Creek, Willow Creek, Sheep Creek, and Goose Creek all failed to reach minimum desired king salmon escapement levels. From 2007 - 2011 (a period of 5 years) ADF&G failed to measure any king salmon escapement on these streams that achieved a minimum escapement objective. Note: On Sheep Creek ADF&G was unable to count king salmon escapements in 2008 and 2010 due to turbid water conditions.

Additional Missed King Salmon Escapements

More recently, Deshka River missed escapement goals in 2008 and 2009, while Lake Creek missed escapement goals in 2008, 2009, and 2010. Chulitna River missed its goal in 2010, and in 2010 and 2011 Montana Creek, Clear Creek, Prairie Creek, Talachulitna River and Little Susitna River all missed goals. In 2011 Little Susitna River missed its king salmon goal, even after ADF&G's emergency 26-day sport king salmon fishing closure.

Board Adopted Changes

During the winter of 2011 the Alaska Board of Fisheries (BOF) designated Chuitna River, Lewis River, Theodore Creek, Alexander Creek, Willow Creek, and Goose Creek with Stock of Concern status for king salmon, and also closed directed commercial king salmon fishing near the mouths of these streams, and closed sport king salmon fishing in each stream, except Willow Creek. The BOF further reduced legal daily sport king salmon fishing hours in Unit 2 - the east side tributaries of the Susitna River between Willow Creek and Talkeetna River (excluding the Talkeetna River). When legal daily fishing hours were reduced from 24 to 17 hours per day, a decision allowed

king salmon sport fishing to continue on Willow Creek and Sheep Creek, Finally, the BOF closed king salmon fishing for the last 3 day “weekend” of the season on all Unit 2 waters previously open to sport king salmon fishing.

Flood Water Considerations:

The Northern Cook Inlet Management Area experienced fall flooding in both 2005 and 2006 with the 2006 flood having larger water volumes for a longer duration. Therefore, maximum negative impact on future king salmon returns from these flood events would logically be expected to occur in 2010 and 2011 -- when offspring from the 2005 and 2006 parents were expected to return as dominant 5 year-old age class spawners. 2010 and 2011 proved poor years for attainment of even minimum king salmon spawner escapement levels on most Northern Cook Inlet streams, and only 5 of 17 streams with ADF&G established king salmon spawning goals reached minimum targeted escapement levels.

Measured Flooding Durations

United States Geological Survey recorded Little Susitna River water volumes during both the flood of 2005 and 2006, but another measurement of these floods can be seen in the durations of time that ADF&G's Little Susitna River salmon counting weir was inoperable because of flooding conditions. In 2005 the weir was inoperable for a stretch of 12 days in mid-September, after which it was removed for the remainder of the season. In 2006 the weir was inoperable for a period of 14 straight days from August 18 - August 31. In the 5 years following the 2006 flood (2007 -- 2011) water levels have remained relatively stable with only 2 days of flooding conditions high enough to make the weir inoperable during the entire 5 year period. Those two days of flooding occurred on August 9 and August 10, 2011.

On Deshka River, weir counts were made throughout the entire 2005 season with no days lost to flooding. In 2006, however, no salmon were counted for the remainder of the season starting on August 16. This is a period of approximately 22 days with no counts -- which again illustrates the severity of the 2006 flood. In the 5 years following the 2006 flood ADF&G notes from the Deshka River weir indicate the weir was only inoperable for a total of 7 days, all of which occurred in 2011.

2012 -- Start of 5 Year Period of Increasing King Salmon Returns?

Since former ADF&G Area Management Biologist (Dave Rutz) had predicted the downturn in Northern Cook Inlet Management Area king salmon returns and based on reduced production from parent spawners after 2006 floodwaters scoured salmon spawning beds, it seems logical to conclude lower than average king salmon returns occurring in 2010 and 2011 were at least partially a direct result of the 2005 and 2006 floods. Since area streams have not experienced any flood event since 2006, even close to what occurred then, logically, the negative impact from flooding on king salmon spawning production shrinks after the 2011 season. Therefore, for the 5 years starting in 2012, a cautiously optimistic viewpoint concerning forecasting increased Northern Cook Inlet king salmon returns should be considered -- at least for specific streams. Streams with a distinct downturn in production during 2010 and 2011 (possibly related to 2005 and 2006 fall flooding) therefore, may experience a rebound in spawning escapements, starting as early as 2012. Little Susitna River, Montana Creek, Clear Creek, Prairie Creek, and Talachulitna River could all experience rebounds in production that could possibly bring escapements all the way back into goal ranges -- if poor production from these streams during 2010 and 2011 was primarily a result of 2005 and 2006 flooding. Additional streams with distinctly poor escapements in 2010 and 2011, but with longer histories of missed escapement objectives, which may see increased king salmon escapements starting in 2012 include Chuitna River, Lewis River, and Theodore Creek.

While relief from the effects of previously occurring large fall floods may likely provide some increased king salmon production from Northern Cook Inlet king salmon streams, such relief will likely NOT return king salmon production to pre-2007 levels throughout the area, so additional reductions in king salmon harvest / mortality may be prudent, to better ensure attainment of specific near-term king salmon escapement goal ranges.

Run Monitoring Suggestions

Following recent downturns and sporadic production in king salmon returns to Northern Cook Inlet streams, it has become increasingly difficult to predict the likely level of king salmon returns to specific streams. Data from Deshka River weir has been extremely helpful for predicting the next year's likely production for that one stream. When combined with weir-measured inseason escapement levels these projections provide much more accurate inseason management of the Deshka River king salmon return. A large Deshka River preseason projection of

around 30,000 king salmon could also indicate widespread better production throughout the Susitna River Drainage or perhaps even all or Northern Cook Inlet. The 2012 projection, unfortunately, falls in the range of a 20,000 king salmon return to the Deshka River, similar return levels were seen in both 2010 and 2011. Therefore, while the 2012 Deshka River projection does not indicate a decline in king salmon return levels, it also does not necessarily indicate any significant increase in king salmon return levels, either.

With the Deshka River weir considered the most reliable gross indicator of inseason king salmon abundance throughout the entire Northern Cook Inlet Area, and with chronically occurring low king salmon escapement levels throughout the area, the necessity of additional inseason monitoring of discreet king salmon stocks should become an increasingly higher management priority.

While planned weirs on Stock of Concern streams: Chuitna River, Lewis River, and Theodore Creek should provide new information, there is no previous years' data from these sites, so interpretation of weir monitored escapements compared to aerial index counted escapements will take a few years to develop, and configuring inseason management adjustments based on the magnitude and timing of these weir counts will require additional time to develop and fine tune. These streams are remote with fairly small runs of king salmon, and long-term use of weirs at these sites would entail allocating a considerable amount of limited management funds.

Some area streams where previous ADF&G king salmon monitoring efforts could be expanded and utilized include using the Little Susitna River weir in a downstream location for earlier king salmon abundance monitoring and inseason management, creel census at Lake Creek for a gross indicator of inseason abundance for Lake Creek and the Yentna River drainage, and creel census along the eastside tributaries of the Susitna River - which may be cost effective, but of less management value.

Inseason Abundance Monitoring Priorities

Discussions with long-term former area fisheries management biologist, Larry Engel, provides insight that Little Susitna weir and Lake Creek creel census may offer some of the most consistent, timely, and useful inseason management data. Concerning king salmon creel census on eastside tributaries of the Susitna River, Larry says run timings vary, but a majority portion of eastside tributary returns arrive too late in the season for creel census data from eastside Susitna tributaries, to provide as much inseason management value.

Creel census at three public locations on eastside tributary streams, however, may be collectible at very little cost to ADF&G. The state campground / parking fee booth attendants at the Willow Creek Recreation Area facility, and the private concessionaire at Susitna Landing are already present working with the public at these facilities, and may be able to collect creel census data at very little additional cost. This approach should also be considered at Talkeetna Boat Launch, and if collection costs are low enough, late season data from these three sites may prove economically beneficial while providing additional inseason management flexibility.

Possible Restrictions to Sport and Commercial Fisheries

In light of chronic low king salmon escapements to several Northern Cook Inlet streams further harvest restrictions may be required. ADF&G should make two considerations in formulating such restrictions: 1. What restrictions will actually help attain the king salmon escapement goals in question. 2. How can the fishery be managed to meet the goals, and maintain maximum benefit from remaining harvestable surplus resource.

Time and Area Restrictions

Undoubtedly the most effective way to reduce human harvest and catch and release mortality would be to close either an entire fishery or close specific areas where harvest / mortality rates are particularly high. Such a closure could be for a specific portion of the season or for the entire season. As mentioned earlier, entire season closures were already adopted by the BOF for commercial fisheries near, and sport fisheries within, five Stock of Concern designated streams. Unless ADF&G is willing to reduce harvest / release mortality rates further out in saltwater areas or for extended periods of time, specific Stock of Concern streams have already been addressed to the fullest extent possible, in reducing human harvest and catch mortalities.

The Matanuska Valley Fish and Game Advisory Committee recently sent ADF&G a letter suggesting how time and area closures might be used inriver and around the mouth of the Little Susitna River to both increase king salmon spawning escapement levels, and slow harvest enough, that sport and commercial fisheries may remain open for recreational and economic benefit for the full length of their respective seasons. A similar reduction idea

in time and / or area open to king salmon fishing may provide the best opportunity to attain king salmon spawning escapement goals, while still maintaining benefit from the king salmon stocks in the Unit 2 Area of the Susitna River, including tributary streams (between Willow and Talkeetna).

In Unit 2 primarily harvest and fishing areas are already restricted to small portions of Susitna River tributary streams, and the confluence mixing areas near the stream mouths. While the Susitna River is also open to king salmon fishing, away from the tributary confluences, the main river is too muddy to provide significant king salmon harvest or catch by legal sport fishing methods and means. Therefore, unless ADF&G considers reducing harvests within densely fished areas near stream mouths, main river restrictions, or restrictions further up tributary streams would be problematic as to how many king salmon could actually be saved for spawning purposes.

Time Restriction Considerations

The Unit 2 king salmon season currently runs from January 1 - through the third Monday in June, and then for the following two Saturday, Sunday, and Mondays. After king salmon season closes, portions of Unit 2 streams that were open to king salmon fishing, then remain closed to all fishing until July 14. At which time, all Unit 2 waters opens 7 days a week, and 24 hours a day through December 31 for all species other than king salmon. There may seem to be plenty of days where the fishery could be closed or restricted in order to save king salmon for spawning escapement, however, in reality the bulk of the catching and harvesting of king salmon occurs during that portion of the season where the streams are only open on a Saturday, Sunday, Monday basis each week. Undoubtedly, a limited number of king salmon could be saved for spawning escapement by reducing the amount of days where fishing is allowed in the earlier January 1 - third Monday in June period. During this period, however, king salmon seem to be primarily holding near stream confluence areas or traveling up and down the Susitna River checking out numerous tributaries. Therefore fish saved by closure days early in the season, which had not migrated past open waters, may only be caught later during days when the fishery reopened. For that reason, it makes more sense to close days later, when significant numbers of king salmon are actively migrating through, and past tributary areas where most catch and harvest occurs.

In 2009 and 2010 ADF&G closed Unit 2 king salmon fishing by emergency order during a 3rd Saturday, Sunday, Monday only period. In 2011 the BOF adopted that change into regulation, so the fishery has already been shortened on the late end. In 2010 by calendar date pattern, one additional day was closed on the early end of the season compared to 2009. In 2012 a total of 3 days on the early end of the season will be closed in comparison to the 2009 season. Of the potential days that could be closed to save king salmon for spawning escapement early in the season, these 3 days would most likely save the most king salmon. Remember, also, that if the weir is utilized to monitor 2012 king salmon escapement at a down stream location on Little Susitna River, and if time and area restrictions successfully allow king salmon fishing to remain open there throughout June, then Unit 2 king salmon fishing harvest and effort will likely decrease to some extent. Depending on how many additional king salmon Department staff believe are needed, ADF&G may choose to close additional days of the Unit 2 season.

Considering that portion of the Unit 2 season when the most kings are migrating through the area open to king salmon fishing, and when the fishery is currently open only on Saturday, Sunday, and Monday each week: Depending upon how many kings were needed for escapement: 1. the entire time could be closed, 2. the entire time could remain open, or 3. some days could be closed with the rest remaining open.

King salmon run timing throughout Unit 2 varies, with the usual pattern being tributaries draining into the Susitna River at lower river locations often have earlier run timing than tributaries further upstream. Therefore if the goal is to increase escapements in tributaries throughout all of Unit 2, while at the same time allowing some king salmon fishing opportunity, the best solution may be to reduce days fishing is allowed on a weekly basis. The pattern of allowing fishing on Saturdays and Sundays, only, during times of lower king salmon abundance, has proven to work well in the past for both meeting escapement objectives, and maximizing sport angler participation. This approach also avoids overloading other Northern Cook Inlet king salmon streams with displaced angler effort during busier weekend timeframes.

Considering current participation patterns, where most Unit 2 angler effort occurs on the weekends, it could be beneficial for more people, to prioritize keeping the fisheries open on the weekends over allowing fishing to remain open on Mondays. If it was necessary to reduce a second day from the current 3-day open periods, a time

advantage for most resident anglers may be realized if the day remaining open was Saturday. With legal king salmon fishing hours restricted between 6 a.m. - 11 p.m., this would allow people to get off work, sleep at home or camp near their preferred stream, and still reach a fishing spot in time to start fishing early Saturday morning. When the fishery closed that evening, anglers could either camp near the stream or travel home, with plenty of opportunity to care for any fish harvested, clean up, and catch up on sleep, before heading back to work on Monday.

Other Possible Sport King Salmon Fishery Restriction Considerations

If significant numbers of extra king salmon are needed to reasonably attain Unit 2 king salmon escapement goals, with fishing areas already being so small, emergency order time restrictions (reducing days of effort) seem the best approach for reaching the goals. However, ADF&G is also evaluating other possible restrictions -- each of which has its own considerations.

Limiting Artificial Lures to Only One Single Hook

Some number of king salmon could be saved by requiring anglers use only one single hook when fishing Unit 2, and other streams with chronically low king salmon escapements. From experience as a 29-year fishing guide on Northern Cook Inlet streams, I believe the net result of saved king salmon from this stipulation, would likely be small. However, if this regulation was necessary to keep even one stream open for one day, anglers could support it. If catch and release only fishing were chosen as an emergency restriction to be used in 2012 -- the use of only one single hook, as part of the catch and release program, should be required to reduce damage and mortality that might be compounded by use of multiple hooks.

Reduced Seasonal Limit (possibly reduced from 5 to 2 per year)

On heavily participated fisheries like Little Susitna River, Unit 2 tributary streams, Talkeetna River system, and Deshka River, enough daily king salmon angling effort occurs, that a reduced seasonal limit may provide very little (if any) positive change on the number of king salmon allowed to spawn. A more likely scenario on heavily used fisheries is that harvest may simply be transferred between sport anglers. Even if the number of kings harvested under the standard king salmon bag limit could be reduced by a 2 fish limit, it is likely a higher number of resident anglers (who caught or thought they might catch the seasonal limit) would simply expand their harvest potential through use of the state's proxy system. If a reduction in harvest is the objective, then something must be done to close or reduce the proxy system loophole, before a reduced seasonal limit would likely have much value.

A negative consequence of a reduced seasonal limit is the financial impact it would have on the visitor and sport fishing industries. Throughout Alaska, visitor marketing dollars are often generated through a bed tax on local daily lodging receipts. Reducing the seasonal king salmon limit would likely cause cancellations or at least loss of duration of reservations with guiding, lodging, and other visitor related industries. It would also likely generate reduced sport fishing license and king salmon stamp sales. Even if the state and businesses could make up lost longer duration revenues, by selling / booking shorter licenses, stamps, and reservations, there would likely be extra marketing and booking expenses for selling an increased number of shorter opportunities -- a situation reducing rather than maximizing benefit from the resource.

Even considering overall guided or chartered angler harvests, if additional shorter duration fishing trips could be booked in place of longer trips -- then likely little, if any harvest reduction would occur from a reduced season limit.

Bottom line, the most likely result of a reduction in the 5 fish seasonal king salmon limit (in addition to economic loss) would be a REALLOCATION of sport king salmon harvest within the sport fishing user group -- not necessarily a reduction in harvest. Therefore, if desired, such an allocations change, should be made through regular BOF allocation consideration process, and not by ADF&G managers through emergency regulation.

A limit stipulation a large majority of business owners, anglers, and enforcement officers would likely support, during times of shortage (especially on busy road accessible fisheries), is that all anglers be allowed to harvest only one king salmon daily (either normal limit, or proxy limit -- but not both). Both normal harvest and proxy harvest could continue, but total harvest opportunity would reduce to one fish daily per person during times of low king salmon abundance.

Catch and Release King Salmon Fishing

The positive aspect of reducing harvest to near zero must be weighed with the reality of how many fish could be lost to hooking and handling mortality. Catch and release regulations also lead to regulation violations -- specifically many anglers want to take pictures of their catch. Fishing guides know, telling excited anglers they must keep kings they plan to release in the water, often does not work. People lift fish out of the water, in hopes of gaining better pictures.

Another negative impact of catch and release fishing is that most trips may run for a longer duration -- with more fish caught and handled. Currently on easily accessible Northern Cook Inlet streams, anglers are required to quit fishing, for all species of fish for the remainder of the day, after taking a king salmon. Many anglers choose to keep their first king salmon, and thus remove additional pressure off the resource, therefore, a catch and release fishery may readjust pressure to both the resource, and other resource users who may be sharing common fishing areas. When addressing relatively small runs of king salmon chronically underachieving spawning escapement goals, many anglers would rather see all fishing closed for a period of time, in hopes that the fishery would rebound to abundance sooner, rather than risking additional years of future poor production to accommodate catch and release fishing.

Unit 5 (Talkeetna River Drainage) Evaluations

Perhaps the first consideration ADF&G should make concerning the Talkeetna River drainage king salmon fishery may be: what is the likely hood Unit 2 emergency king salmon restrictions will have adequately addressed king salmon shortages within the Talkeetna drainage?

If ADF&G biologists believe shortfalls in Talkeetna River drainage king salmon escapement may remain, after Unit 2 restrictions, then Talkeetna drainage sport restrictions would be prudent. While each potential restriction evaluated for Unit 2 streams could also apply to Unit 5, there is another regulation ADF&G, in consultation with Unit 5 stakeholders, should consider, first.

Should Regulation Require Anglers Quit Fishing After Harvesting a King Salmon?

Aside from anglers that have harvested a king salmon from one tributary of the Talkeetna River (Clear Creek) all remaining Unit 5 anglers, after harvesting a king salmon, are currently allowed to continue fishing, that day, for all species of fish. During times of king salmon abundance, this opportunity maximizes benefit from a king salmon resource consistently achieving spawning escapement goals. In light of recent king salmon escapement shortfalls, however, businesses and angler stakeholders who use the Talkeetna River king salmon resource should evaluate whether restricting angler participation, after harvesting a king salmon, might be an adequate and more acceptable means of reducing king salmon harvest / mortality than ideas discussed earlier. Such a regulation would likely reduce both harvest, and mortality caused by excessive hooking and handling, of a limited king salmon resource.

Unit 4 (Yentna River Drainage) Sport Stakeholder Considerations

When addressing king salmon spawning escapement shortfalls within the more remote Yentna River drainage, ADF&G managers should consult with stakeholders from that fishery to decide what restrictions may best achieve escapement needs, while still providing the most valued benefits for users of the fishery.

Unit 1 (Lower Susitna River, Alexander Creek, Deshka River)

The only king salmon spawning escapement shortfall identified by ADF&G within the past two years for Unit 1 is a chronic inability to meet king salmon spawning objectives on Alexander Creek. As mentioned earlier, this situation has already been addressed by a BOF adopted closure of all king salmon fishing year-round on Alexander Creek. In addition, ALL sport fishing is closed within a 1/2- mile radius of Alexander Creek's confluence with the Susitna River from May 1 - July 13. On the lower Sustina River ADF&G biologists should consider whether sport harvest or angling pressure may be having a significant adverse impact on king salmon stocks bound for upstream tributaries. Reported king salmon harvests and angling pressure are relatively light below the Deshka River confluence with the Susinta River. The Deshka River king salmon fishery, however, produces some of the highest king salmon angler participation, catches, and harvests within the entire Susitna River drainage. Deshka River is also the only fishery within the entire Northern Cook Inlet Area, where ADF&G has a weir that supplies timely and accurate inseason escapement data that can, and should be used as the primary means for making timely emergency order changes to this fishery. Use of Deshka River weir data, thus allows much more precise management changes to be made in relation to escapement goals needs, thereby, allowing nearer maximum utilization from this highly productive fishery. Department biologists may want to

evaluate, consider, and possibly restrict the potential impacts of the sport fishery near the Deshka River / Susitna River confluence on king salmon stocks bound further up the main stem Susitna River. Aside from this consideration, Deshka River escapement goal needs and maximum benefit from the resource are likely best achieved from utilizing Deshka River weir data to precisely administer most emergency management changes inseason. This is especially true for years similar to 2012, where ADF&G Deshka king salmon return projections, generated from Deshka weir data, indicate a likely adequate king salmon return to provide a full season of sport opportunity, while still meeting escapement goal needs.

Potential Commercial King Salmon Harvest Reductions

Since ADF&G Sport Fish Division Managers have been actively discussing restrictions to primary sport users of king salmon, identified within the Northern District King Salmon Management Plan, I request the Department answers to the following questions:

Should undeniable Northern Cook Inlet king salmon spawning escapement shortfalls, trigger action from both sport fish and commercial fish divisions within ADF&G?

How do commercial managers suggest restricting the Northern Cook Inlet commercial king salmon fishery to share the conservation burden as provided in 5ACC 21.366 (b), clarified by the BOF in 5ACC 21.363 (e), and outlined in ADF&G's Sustainable Salmon Fisheries Policy?

Should continued failure by ADF&G commercial managers to address ADF&G identified Northern Cook Inlet king salmon escapement shortfalls and expectations for low king salmon abundance in 2012 be viewed as official Department position to maximize commercial king salmon harvest at expense of spawning escapements, future king salmon production, and benefit to management plan identified primary sport users?

Is ADF&G willing to request, and follow, additional BOF clarification of management intent before any 2012 emergency restrictions are applied?

REQUESTED ACTIONS

1. * Announce Known Emergency Regulation Restrictions Soon**

While ADF&G should consider likely effectiveness and unintended impacts of potential restrictions, sport fishing industry businesses like tackle shops, boat launch facilities, guide services, lodging providers, and fish processing services need as much lead time as possible to plan their seasons. Both nonresident and resident anglers will want to plan their vacations based on these regulations. Travel agents, restaurant management, fuel service businesses, and boat dealers need to know what inventory to order or what products will sell -- subjects partially based on fishing regulations. If ADF&G hopes to include new regulation stipulations in 2012 Sport Fishing Regulation Booklets, changes must be made with enough time to get this done. Although commercial fishermen often deal with emergency regulation changes, announced on very short notice, some or all commercial harvesters and processors would appreciate knowing any emergency regulation changes as soon as possible.

2. *Use Deshka River Weir Data to Fullest Management Advantage**

Since Deshka River often has one of the largest harvestable surplus number of king salmon in the entire Susitna drainage, and since ADF&G's 2012 Deshka River king salmon projection shows a likely adequate king salmon return to meet the escapement objective and provide a full season of sport fishing opportunity, and since ADF&G should have an accurate count of king salmon passing the weir to make timely and precise regulation changes, the Deshka River sport fishery should be managed primarily on an inseason abundance basis. Balanced management should include inseason adjustments to low king salmon abundance (which is the primary topic of this letter), but also inseason emergency adjustments to higher king salmon abundance (something which often has not occurred in past Deshka River king salmon management).

Using Deshka inseason weir data to fullest management advantage should include extending the legal king salmon fishing season, if and when a specific and publicly known trigger number of king salmon passes the weir. A similar approach has been used on other salmon fisheries throughout Alaska, but has only inconsistently occurred on the Deshka River king salmon fishery. Since the Deshka River king salmon run is usually thousands

of fish larger, and since the bottom end of the weir- measured Deshka River king salmon escapement goal range is already more than three thousand king salmon higher than the top end of any other Northern Cook Inlet king salmon goal, and since advance knowledge of emergency regulation changes is advantageous to most public participants, It is therefore recommended 16,000 king salmon passing the weir could be used as the trigger point to announce extending the Deshka River season through July 31. To sufficiently protect king salmon spawning escapement, while also providing a reasonable fishing and harvest opportunity any extensions of the Deshka River king salmon fishery should be scheduled to occur only downstream of the Deshka River Weir Sanctuary Area. Distinct advantages for a Deshka River season extension are it would increase sport fishing opportunity when a harvestable surplus was present, and it would reduce angling impact on less abundant Susitna River king salmon stocks.

Continuing with the balanced active management theme, ADF&G already closes the Deshka River fishery to bait **during the king salmon season** when low king salmon abundance makes attaining the Deshka River king salmon escapement goal unlikely. I recommend an additional management action -- on years when the king salmon fishery has been closed to bait, but the Deshka River weir count remains below 10,000 king salmon, delay the re-opening of Deshka River to bait fishing until July 21. This reasonable conservation restriction would allow additional king salmon to escape past the weir during years of low abundance.

3. *Close Deshka River May Bait Use to Pass Additional King Salmon**

As alluded to earlier, the slow deep pool near Deshka River's confluence with the Susitna River likely provides a larger king salmon intercept harvest, of fish bound further up the main stem Susitna, than any other location in the entire Susitna River drainage. This area and for a distance of 17 miles up Deshka River is the only location in the Susitna River drainage where anglers can legally use bait when targeting king salmon. Harvesting upper drainage bound king salmon, with bait, as they mill and rest in the Deshka River confluence pool exacerbates the already inadequate king salmon escapements into upstream tributary streams. As agreed to by representatives from the Susitna Valley Fish and Game Advisory Committee, Matanuska Valley Fish and Game Advisory Committee, and Matanuska -Susitna Borough Fish and Wildlife Commission at the Upper Cook Inlet BOF meeting, **closing this area to bait use for 17 days --through May 31, would allow more king salmon to reach streams where some of the greatest escapement shortfalls have been occurring -- while still allowing king salmon harvest opportunity.**

4. *Monitor Little Susitna River King Salmon, Restrict Fishing by Time and Area**

Publicly prioritize managing the Little Susitna River king salmon return using a weir count on the lower river, and restrict both the inriver king salmon sport fishery and commercial king salmon fishery within a one mile radius of the Little Susitna River confluence with Knik Arm / Cook Inlet. As unanimously supported in Matanuska Valley Fish and Game Advisory Committee's December 14, 2011 letter to ADF&G Regional Supervisors Lingnau and Hasbrouck, these precautionary measures would help ensure adequate Little Susitna River king salmon escapement, foster sharing of the king salmon conservation burden between sport and commercial users, and provide a higher likely hood that both user groups may harvest king salmon throughout the duration of their BOF adopted king salmon seasons. Little Susitna River has provided some of the highest days of sport angler use of any stream in Northern Cook Inlet over a period of the last 30 years. While technically not a part of the Susitna River drainage, Little Susitna River salmon stocks have provided, long-term, important economic and recreational opportunities for thousands of Alaskans and visitors on an annual basis. The state of Alaska has invested millions of dollars in facilities, salmon studies, and salmon management on this river. During 2009, 2010, and 2011 ADF&G closed the Little Susitna River sport king salmon fishery earlier, by emergency order, each year. Even so ADF&G failed to attain the king salmon spawning escapement goal in both 2010 and 2011. ADF&G also failed to attain Little Susitna River coho salmon spawning escapement goals in 2009, 2010, and 2011. Little Susitna River sport users are tired of ADF&G failures to meet king and coho salmon escapement goals, tired of passively monitored emergency closures and restrictions -- viewed as more heavily impacting sport users -- and tired of ADF&G resistance in returning to weir count based abundance management for both Little Susitna River king and coho salmon stocks.

In addition to more precise and timely management of Little Susitna River king and coho salmon, full season weir monitoring at a down stream location on this river could once again provide ADF&G with accurate and complete sockeye, chum, and pink salmon counts at no or little extra cost, would provide a gross indicator of coho salmon abundance in other Knik Arm streams -- as previously publicized by ADF&G staff, and would provide another timely gross indicator of likely king salmon returns to Unit 2 Susitna River tributary streams.

Please make these previously requested precautionary changes in 2012!

5. *Close Days In Unit 2 Sport King Salmon Fishery, Monitor, Delay Bait**

As mentioned earlier, 2012 may be the year a rebound in Unit 2 king salmon returns starts to occur. Negative effects from spawning bed scouring by the 2005 and 2006 floods may now be only a bad memory. A reduction in May bait use at Deshka River could allow additional kings to pass through to Unit 2 streams. As a result of the 2012 calendar pattern, 3 days when legal king salmon fishing occurred in 2009 (June 19, 20, and 21) will be closed in 2012 -- providing additional escapement opportunity for some of these fish. Increased fish from 2011 BOF changes closing the last 3 day "weekend" and reducing legal fishing hours should allow more fish to spawn. Finally precautionary management of the Little Susitna River fishery may allow it to remain open later in June, thereby, relieving king salmon effort and harvest on Unit 2 streams. Even with all these possibilities to boost 2012 king salmon returns in Unit 2 streams, escapement goals have been missed for several years at some locations, and precautionary regulations may still be needed to attain specific escapement goals. Consistent with the earlier discussion on which dates would be most effective for passing king salmon escapement without unduly restricting fishing opportunity I recommend closing June 18, June 25, and July 2. As a means of showing active management effort on the Department's behalf (other than closing or restricting users) I recommend establishing king salmon creel census efforts at Willow Creek Recreation Area, Susitna Landing, and Talkeetna Boat Launch. After the king season ends -- I recommend closing the use of bait until July 21. This would allow one more week of reduced king salmon exploitation at a time when king salmon are vulnerable to being caught with bait. Legal fishing for other species would continue, but without baited hooks, significantly less king salmon would be caught. Delaying the use of bait would also reduce catch and harvest of other, targeted species, but seems a reasonable cost, to ensure maximum conservation benefit from earlier recommended actions.

6. *Talkeetna Drainage - Harvest / Quit? Close Area, Monitor, Delay Bait**

Hopefully, actions taken further downstream at Deshka River and Unit 2 will pass more king salmon on to the Talkeetna Drainage. I still recommend precautionary regulations as a means to better ensure attaining escapement goal objectives. First consider harvest a king salmon / quit fishing remainder of the day on a drainage wide basis -- would user groups accept this provision to help low abundance king salmon stocks recover? Consider closing Clear Creek and the area from the upstream most confluence of Fish Creek with the Talkeetna River, downstream to the Talkeetna River gauging station for one day per week during the last two weeks of the season to encourage king salmon passage. Anglers could still fish at other Talkeetna River locations for all species of fish on these days. Conduct a king salmon creel census at the Talkeetna River Boat Launch / cleaning table in order to provide opportunity for active inseason management. Finally, consistent with recommendations for Deshka and Unit 2, delay the use of bait on the Talkeetna River drainage. Start legal bait fishing on July 21. This discourages the practice where anglers fish for "other species," using bait, starting the day after king salmon season, and "incidentally" bait hooking and potentially injuring several king salmon.

7. *Yentna drainage - Monitor, Harvest / Quit? Single Hook, Delay Bait**

Throughout this remote unit, in addition to maximizing efforts to consistently attain king salmon escapement goals, ADF&G should attempt to tailor regulations to fit the needs of the business owners, residents, and guests who depend upon and utilize the king salmon resource. Similar to the Deshka River tributary of the main stem Susitna River, some of the highest angler effort, catch, harvest, and interception of king salmon bound for upriver destinations of the Yentna drainage occurs in the Lake Creek / Yentna River confluence area. Unlike Deshka, however, ADF&G has limited inseason king salmon abundance data for Lake Creek, and the entire Yentna River drainage. Larry Engel has identified the previously used ADF&G Lake Creek king salmon creel census as a good quality and timely indicator of gross king salmon abundance, not only for Lake Creek, but for the entire Yentna River drainage. Shouldn't ADF&G use its best available science to help these important king salmon stocks recover? Depending upon creel census abundance estimates, time and area restrictions may or may not be necessary. To help low abundance king salmon stocks recover more quickly, would most businesses and anglers be willing to quit fishing, for the remainder of the day, for all species of fish in flowing waters of Lake Creek or the entire Yentna River drainage -- after harvesting a king salmon? Single hooks were more widely used in the past, and specifically on Lake Creek. If Yentna users prefer a catch and release type fishery and / or opportunity to continue fishing after harvesting a king salmon, then a return to using only one single hook should reduce potential negative resource impacts. Delaying the use of bait for a week until July 21 is a no-brainer for

rebuilding low abundance king salmon stocks, and would be consistent with the current Little Susitna River regulation, and earlier requested actions on other Susitna River drainage waters.

8. *Reduce Harvest Opportunity to One King Salmon Per Person Per Day**

With chronic widespread king salmon spawning escapement shortages throughout Northern Cook Inlet, reducing each Alaskan's daily harvest to only one king salmon per day could add additional king salmon escapement, especially on remote systems. A combined sport / proxy harvest opportunity of only one king salmon per day would also simplify regulation enforcement. If ADF&G desires BOF authorization before considering this issue, please request it.

9, * Meet with Fish and Wildlife Enforcement to Prioritize Enforcement Efforts**

ADF&G should provide data concerning locations enforcement efforts are most needed to address ongoing king salmon escapement shortages, including specific run timing, when known, so enforcement efforts may save a maximum number of king salmon for spawning escapements within present budget constraints. Enforcement efforts of subsistence, sport, and commercial fishing regulations should all be addressed.

10. *Adjust Northern District Commercial King Salmon Harvest Opportunities**

With more than 1/3 of Northern Cook Inlet king salmon stocks with ADF&G established escapement goals designated with Stock of Concern Status, and with 2/3 of Northern Cook Inlet king salmon stocks failing to attain king salmon escapement goals during both 2010 and 2011 conservation efforts certainly qualify as a crisis situation. When specifically questioned by a board member at the 2011 Upper Cook Inlet BOF Meeting, Could ADF&G Commercial Fish Division use emergency order authority to adjust Northern District commercial king salmon regulation to address shortages in king salmon abundance?

"YES," was the official Department answer given by ADF&G Commercial Management Staff. This should be part of 2011 BOF Upper Cook Inlet meeting record -- if anyone want to check.

Ten years ago, Northern District commercial king salmon openings were limited to 6 hours per day, with less openings scheduled per year. King Salmon escapement goals were more often met, at that time. An additional annual commercial opening and doubling of hours allowed per commercial opening are only one cause for decline of Northern Cook Inlet king salmon stocks. In the present period of low king salmon returns and ADF&G documented king salmon escapements shortfalls, however, precautionary emergency restrictions similar to previous commercial regulations when escapement goals were more regularly met, would be prudent, consistent with requested restrictions on sport users, and emergency regulations may be rescinded if ADF&G monitoring efforts show adequate king salmon abundance.

The time is now for commercial managers to use ADF&G's emergency authority, to restrict commercial harvest to more equitably share the conservation burden necessary for recovery of troubled Northern Cook Inlet king salmon stocks.

ADF&G action has been requested, and a timely response would be appreciated.

Sincerely,

Andrew N. Couch

Concerned Citizen, Fish and Game Advisory Committee Member, Business Owner

electronic cc: Alaska Board of Fisheries, Governor Parnell, Commissioner Campbell, Mat-Su legislative delegation, Susitna Valley Fish & Game Advisory Committee, Anchorage Fish & Game Advisory Committee, Alaska Sportfishing Association, Mat-Su Anglers Club, Matanuska-Susitna Borough Fish & Wildlife Commission, Alaska Outdoor Council, Northern District Setnetters Association, and other interested parties