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Southeast Alaska Fishermen's Alliance PC5



Chignik Fishermen United  
Mori Jones, President  
PO Box 11  
Chignik Lagoon, Ak 99565

RECEIVED  
OCT 08 2007  
BOARDS

FAXED  
10/8/07

October 3, 2007

Alaska Department of Fish and Game  
Alaska Board of Fisheries  
PO Box 25526  
Juneau, Ak 99802-5526

Attn: Mel Morris (Chair)

Dear Mr. Morris.

Chignik Fishermen United members are extremely interested in the "restructuring" proposals 33 and 34 and what affect they will have both economically and socially if allowed in the Chignik Management Area.

We are available to answer any questions that the board may have concerning our fishing area and practices, before or at the January meeting.

Since these "restructuring" proposals are new to the board, we will be following the process closely.

Sincerely,

  
Mori Jones

COMMENT# 1



# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
Office of Subsistence Management  
3601 C Street, Suite 1030  
Anchorage, Alaska 99503

NOV 21 2007

FWS/OSM/BOF Chignik

Mr. Mel Morris, Chairman  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
1255 West 8<sup>th</sup> Street  
P.O. Box 25526  
Juneau, Alaska 99802-5526

Dear Chairman Morris:

The Alaska Board of Fisheries will deliberate 2007/2008 regulatory proposals that address Chignik commercial and subsistence finfish fisheries beginning January 10, 2008. We understand that the Board will consider approximately 12 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 preliminary comments on proposals that may have an impact on Federally qualified subsistence users and Federal subsistence fisheries in this area. The enclosed comments address proposals 23 and 24.

We may wish to comment on other specific proposals if issues arise during the meeting which may have an impact 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

Enclosure

Cc: Denby S. Lloyd, ADF&G  
Michael Fleagle, Chair FSB  
John Hilsinger, ADF&G, Anchorage  
Elizabeth Andrews, ADF&G, Juneau  
Patti Nelson, ADF&G, Juneau  
Jim McCullough, ADF&G, Kodiak

Jim Fall, ADF&G, Anchorage  
Tina Cunning, ADF&G, Anchorage  
George Pappas, ADF&G, Anchorage  
Jim Marcotte, ADF&G, Juneau.  
Interagency Staff Committee.

COMMENT#

2

1/5

11/21/07

**FEDERAL STAFF COMMENTS ON  
ALASKA BOARD OF FISHERIES PROPOSALS  
for the  
CHIGNIK MANAGEMENT AREA**

**State of Alaska  
Board of Fisheries Meeting  
January 10-12, 2008  
Anchorage, Alaska**

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### Federal Comments

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

**Proposal 23** requests that subsistence salmon fishing be allowed in the Chignik Lake tributaries of Clark River and Home Creek.

#### **Current State regulations:**

**5 AAC 01.475(2). Waters closed to subsistence fishing.**

*(2) in Black Lake, or any tributary to Black Lake or Chignik Lakes.*

#### **Current Federal regulations:**

*§ .27(i)(8)(ii) You may take salmon in the Chignik River, from a point 300 feet upstream of the ADF&G weir to Chignik Lake from July 1 through August 31. You may not take salmon in Black Lake or any tributary to Black or Chignik Lakes.*

**Is a similar issue being addressed by the Federal Subsistence Board (FSB)?** No.

**Impact to Federal subsistence users/fisheries:** Adoption of this proposal would provide additional opportunities for people fishing under State subsistence regulations. It would make Federal regulations more restrictive than State regulations, since people fishing under a Federal subsistence permit could not legally take salmon in the Chignik Lake tributaries of Clark River and Home Creek.

**Federal Position/Recommended Action:** Support. If adopted this proposal would make Federal regulations more restrictive than State regulations. However, the Federal Subsistence Management Program anticipates this divergence would be resolved by changing Federal regulations through a proposal to the Federal Subsistence Board that would be effective for the 2009 fishing season. No conservation concerns with affected salmon stocks were identified in the proposal.

**Proposal 24** requests regulations to restrict subsistence gillnets to obstruct no more than one half the wetted width of any stream.

**Current State Regulations:**

**5 AAC 01.470. Lawful gear and gear specifications.**

*(a) Salmon may be taken by seines and gillnets, or gear specified on a subsistence fishing permit, except that in Chignik Lake salmon may not be taken with purse seines.*

**Current Federal Regulations:**

*§ \_\_.27(c)(4) Except as otherwise provided in this section, you may not obstruct more than one-half the width of any stream with gear used to take fish for subsistence uses.*

*§ \_\_.27(i)(8)(vi) You may take salmon by seines and gillnets, or gear specified on a subsistence fishing permit, except that in Chignik Lake salmon may not be taken with purse seines.*

**Is a similar issue being addressed by the Federal Subsistence Board (FSB)?** No.  
Current Federal regulations already prohibit gear used to take fish for subsistence uses from obstructing more than one-half the width of any stream.

**Impact to Federal subsistence users/fisheries:** Adoption of this proposal would not impact Federally qualified subsistence users or fisheries. Federal regulations already prohibit gear used to take fish for subsistence uses from obstructing more than one-half the width of any stream.

**Federal position/recommended action:** Support. Adoption of this proposal would align Federal and State regulations pertaining to obstructing streams while subsistence fishing, and reduce regulatory complexity and enforcement concerns. Allowing users to totally block salmon streams with fishing gear would obstruct salmon migration and could result in overharvest.

COMMENT#

2



## United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
Office of Subsistence Management  
3601 C Street, Suite 1030  
Anchorage, Alaska 99503

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NOV 28 2007  
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FWS/OSM/BOF Chignik

Mr. Mel Morris, Chairman  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
1255 West 8<sup>th</sup> Street  
P.O. Box 25526  
Juneau, Alaska 99802-5526

Dear Chairman Morris:

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The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and developed preliminary comments on proposals that may have an impact on Federally qualified subsistence users and Federal subsistence fisheries in this area. The enclosed comments address proposals 23 and 24.

We may wish to comment on other specific proposals if issues arise during the meeting which may have an impact 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

Enclosure

Cc: Denby S. Lloyd, ADF&G  
Michael Fleagle, Chair FSB  
John Hilsinger, ADF&G, Anchorage  
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Jim McCullough, ADF&G, Kodiak

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Tina Cuning, ADF&G, Anchorage  
George Pappas, ADF&G, Anchorage  
Jim Marcotte, ADF&G, Juneau.  
Interagency Staff Committee.

COMMENT#

2

5/8

December 10, 2007

Mr. Jim Marcotte  
Board of Fisheries  
P.O. Box 115526  
Juneau, AK. 99811

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Re: Chignik Board of Fish      January 10-12, 2008

Dear Mr. Marcotte,

My name is Mark Wagner. I'm a commercial fisherman from Sand Point, Alaska and I would like to offer the follow comments on proposals 28 and 29 that I oppose.

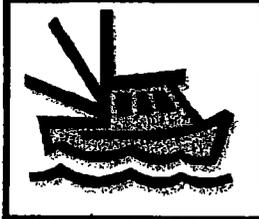
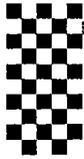
Proposal 28- This proposal would virtually double the fishing area in the current management plan for June. At present, when escapement goals to the Chignik Lake systems are being met, the Department opens the Eastern District. If proposal 28 is adopted, the Department would be required to open the Perryville and Western District, in addition to the Eastern District. Previous high sea tagging studies conducted by the U.S. and Canada clearly indicate that nearly all Chignik bound sockeye in their last summer at sea are found east of the Chignik Lake system. The present management plan, when enacted, used this knowledge to exclude the Western and Perryville districts. This restriction was necessary to reduce the interception of westbound salmon during June. Proposal 28 suggests the potential of overescapement due to the reduction of their fleet. Addressing the need for more area and time to limit overescapement, I would offer the following amendment to the existing management plan. When escapement to the Chignik Black Lake system exceeds the upper escapement goal by twenty five percent (25%), then the Perryville District will be opened in addition to the Eastern District. At the last BOF Area M meeting, the Board addressed the Orzinski Lake sockeye system that had a chronic overescapement problem. The Board adopted the twenty five percent (25%) rule to allow additional area and time if overescapement occurs.

Proposal 29- This proposal would reopen a small area between Area M and Chignik. In the 1990's the Board concluded, after much public testimony, that both Area M and Chignik should be restricted from fishing this area. The Board based their decision on safety and interception concerns. There was serious gear conflict whenever Area M and Chignik were open at the same time. In addition, this area is well known for intercepting migrating stocks traveling East and West. Given the knowledge that closing this small area has caused no overescapement to either Area M or Chignik systems, I don't see the necessity in reopening the area and reintroducing the problems.

Sincerely,

Mark Wagner  
P.O. Box 326  
Sand Point, AK 99661

COMMENT# 3



# F/V Ocean Gold

**Ed Hansen**  
**Phone: 907-586-6652**  
**Fax: 907-523-1168**

**9369 North Douglas Hwy**  
**Juneau, Alaska 99801**  
**Email: gillnet@ak.net**

December 24, 2007

Attn: Board of Fish Comments/Kodiak & Chignik  
Alaska Dept of Fish and Game  
Board Support Section  
PO Box 115526  
Juneau, AK 99811

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DEC 24 2007

BOARDS

SENT VIA FAX: 907-465-6094

Mel Morris, Chair and Board of Fish members,

RE: Proposal #59 – Kodiak Troll Permit & Proposal #34 Chignik Troll Permit

I am opposed to the proposals as written. I do not feel that permits should be changed from one gear type to another. This request is similar to the idea of converting my SE sac roe herring gillnet permit to a seine or pound permit because I could get better value for the fish using an alternative gear type. By starting the precedent of converting permits to an alternate type, the Board of Fish will be swamped with proposals for gear conversions.

If the Board believes that there is sufficient fish to allocate to a troll fishery, the fishery should be re-opened using the current statewide troll permits. The makers of these proposals could purchase and use in this area a statewide troll permit if a fishery is established. The troll fishery at one time fished all over the state and over time has been moved out of areas such as Kodiak etc. until trollers are only allowed to fish east of 144° longitude. When limited entry was implemented on the troll fleet, history from around the state was used to issue permits, now that the troll fishery has been limited to a small area and been affected by

A/C Comment# 4 1/2

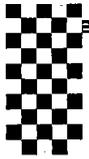
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the Pacific Salmon treaty there are many latent permits in the troll fishery. Trollers have tried many times through the Board of Fish (Southeast cycle) process to regain some of the lost area west of 144° longitude.

Sincerely,

A handwritten signature in black ink that reads "Ed Hansen". The signature is written in a cursive style with a long horizontal stroke at the end.

Ed Hansen



# Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway  
Juneau, AK 99801  
Phone 907-586-6652  
Fax 907-523-1168

Website: <http://www.seafa.org>



E-mail: [seafa@gci.net](mailto:seafa@gci.net)

December 23, 2007

Alaska Department of Fish and Game  
Boards Support Section/ Board of Fish  
Mel Morris, Chair  
PO Box 25526  
Juneau, AK 99802

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RE: Chignik Board of Fish proposals

Mel Morris, Chair

Southeast Alaska Fishermen's Alliance (SEAFa) is a multi-gear non-profit fishermen's organization representing our members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. Our salmon members involved fish gillnet, seine and/or troll gear.

**Proposal #34 Convert Chignik permits to troll permits.**

SEAFa is opposed to this proposal as written. We believe that it would be a bad policy to change permit designations. In order to establish changing a seine permit to a troll permit you would need to re-designate the current statewide troll permits. If there are unallocated coho resources from August 1<sup>st</sup> every year and the Board would like to establish a troll fishery in the area it should be done with the current statewide troll permit. The statewide troll fishery has a historical history of fishing throughout the whole state. The Board of Fish has not wanted to allow troll fishing beyond Cape Suckling because of the ramifications of an expanded fishery on the Pacific Salmon Treaty, gear conflicts and that the resources are fully allocated.

**Proposal #33 Convert seine gear to gillnet gear**

SEAFa is opposed to this proposal. We believe that allowing the changing of gear types is a bad public policy that could eventually lead to undermining the limited entry program completely.

Sincerely,

  
Kathy Hansen  
Executive Director

A/C Comment# 5