# On Time Public Comment List Statewide Finfish and Supplemental Issues Meeting March 19- 24, 2013

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Karl Johnstone Board Chair, Alaska Board of Fisheries Alaska Department of Fish and Game P.O. Box 115526 Juneau, AK 99811 Fax: 907-465-6094

## Chairman Johnstone,

Thank you for the opportunity to comment on proposal 249. It is our view that this proposal is the product of public process and the recommendations contained within it represent the best interests of the resource, its respective user groups, and the communities most dependent on the success and sustainability of both. It is with respect to this public process that we request any policy that the Board of Fish implements in this out-of-cycle deliberation be consistent with the mission statement of its task force and congruent with the solutions that the task force has proposed.

The 2012 season was disappointing for many, and all user groups suffered restrictions due not only to low abundance of Kenai River Late Run King Salmon, (KRLRK), but also to uncertainty in ADFG's current and past ability to enumerate these fish. This uncertainty led to an unprecedented "conservative management" approach to the 2012 season. This approach affected salmon stocks and users throughout all of Cook Inlet. Cook Inlet East Side Setnetters (ESSN's) lost nearly their whole season. ESSN's were restricted due to "likely poor KRLRK performance" as early as June, before any KRLRK's had been harvested or enumerated. Later in the season, all user groups were restricted for the purpose of achieving the KRLRK escapement goal. The events of last season show that the current management plan lacks the "flexibility" to allow limited harvest opportunity for the purpose of achieving all salmon escapement goals. The solutions supported by the majority of the task force seek to give managers this flexibility when managing escapement goals and yield tradeoffs for all stocks of salmon.

Since last summer, we have been fortunate to receive a wealth of new information from ADFG in the form of genetic studies analyzing the makeup of ESSN King salmon catch, as well as KRLRK historic run reconstruction utilizing past methods of enumeration known to be dependable, and new escapement goals recommendations based on Didson technology which is more accurate and dependable than previous sonar technology.

These new reports contain a few interesting results. First, they show that KRLRK's do not show a long term pattern of decline. In fact, just a few short years ago (2003-2006), we experienced record returns and escapements not only in the Kenai, but in many other rivers statewide such as the Deshka, Copper, Kuskokwim, and Nushagak. It also shows that ESSN's harvest less Kenai Kings than previously thought (average of 13% exploitation rate). This new data shows no sign that these fish are overexploited, with an exploitation rate for all user groups combined of just under 40%. Even during years of low abundance, it would be very difficult for our user groups to threaten the sustainability of this stock at traditional exploitation rates. We believe that this was also illustrated and understood throughout the task force process, and the fact that the task force opted to not pursue any harvest method modifications exemplifies the understanding that current methods of harvest by all user groups are acceptable and sustainable, and that diversity of harvest is in fact one of the key strengths of our fisheries.



The 2013 ADFG escapement goal report indicates a 90% MSY range of 13,000-28,000 Kings. ADFG has stated that they included a "small safety factor", and recommended a new escapement goal of 15,000-30,000 fish. The last few years of King escapements well within the SEG range provide a natural resiliency factor for future returns, however they have come at a cost of reduced sockeye yield due to lost harvest opportunity and sockeye escapements in several rivers at levels proven to reduce future returns.

It is with consideration for the sustainability of all of our salmon resources that we support the implementation of a 13,000-30,000 OEG for Kenai River Late Run King Salmon for the purpose of achieving all escapement goals in UCI, as well as providing limited harvest opportunity for all user groups in times of low abundance. When used during times of low King abundance and high Sockeye abundance, the proposed OEG and resulting management alternatives allow ADFG flexibility to manage for escapement goals of all stocks in all rivers, which is in the best interest of all Alaskans. It also takes into consideration that the tradeoff of future yield of several thousand Kings could result in increased yield potential of hundreds of thousands of Sockeye.

In light of the 2012 season and the subsequent creation of the task force, many in our community worked together to formulate a realistic, biologically defensible proposal that creates flexibility for managers, fairness in harvest opportunity, and sustainability for all of our salmon resources. We would like to thank everyone involved the task force process for their time and effort. We have attached some of the data highlighted during the task force process for your review.

We respectfully request that this Board vote to pass the recommendations supported by a majority of the task force for the 2013 season. Absent this decision, we insist that the Board recognize only the newly recommended SEG of 15,000-30,000 KRLRK's, and give respect to the public process by belaying any allocative decisions regarding this fishery until the regularly scheduled 2014 BOF meeting, which will give the public adequate time to properly propose and vet any alternatives.

Respectfully submitted,

Eastside Setnetters

Todd L Smith

Magan M Swith

Sarah A Hudkins

Brian Salud

John Every
Amber Every
Cranda & Johnston

Licaj Habriel

For information regarding these comments, please contact Megan Smith (907)-252-7843, or by email megb100@yahoo.com

# UNDERSTANDING ADF&G DATA

"safety factor") to 30,000 provides a "small safety factor" to reduce risk to the Chinook salmon stock. On Page 16 of the Draft Escapement Goal Report, the recommended goal of 15,000 Without the "safety factor" the NEW SEG would be 12,000-28,000. (3,000 Chinook

# 

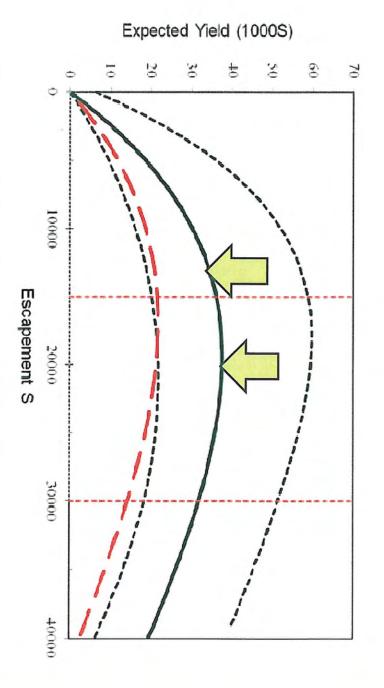
28,990) will commence as age-4 fish in 2013, and from the smaller 2010 escapement (16,320; complete was 23,830 (90% CI: 17,630-31,170) in 1997, which produced 59,000-88,370 (90% slightly elevating the recommended goal is that we have not yet experienced returns from of yield performance. Along with the uncertainties discussed above, the primary reason for 9), being slightly higher than what would be required to symmetrically bracket these measures maximum yield probabilities (Figure 8), nor with respect to expected sustained yields (Figure reduce risk to the Chinook salmon stock. That is, the goal range is not centered with respect to goals increase risk of overharvest) and risk to the fishery (higher goals increase risk of fishery CI) returning adults (Table 4). Returns from the small 2009 escapement (22,320; 17,110escapements below 20,000 (Figure 12). The lowest escapement from which the return is restrictions). The recommended goal of 15,000 to 30,000 provides a small safety factor to Selection of an escapement goal always involves a tradeoff between risk to the stock (lower 12,730-20,590) as age-4 fish in 2014 (Table 4).



# This is a Yield Discussion

There is very little trade-off of yield between 22,000 escapement and 13,000. This is **not** a biological risk.

DRAFT



dashed red lines). productivity for brood years 1979-2008. Vertical lines bracket recommended escapement goal range. function of spawning escapement for late-run Kenai River Chinook salmon, assuming average Expected sustained yield under recent, reduced productivity (brood years 2004–2008) is also shown (long Figure 9.-Expected sustained yield (solid black line), and 80% interval (short dashed black lines) as a



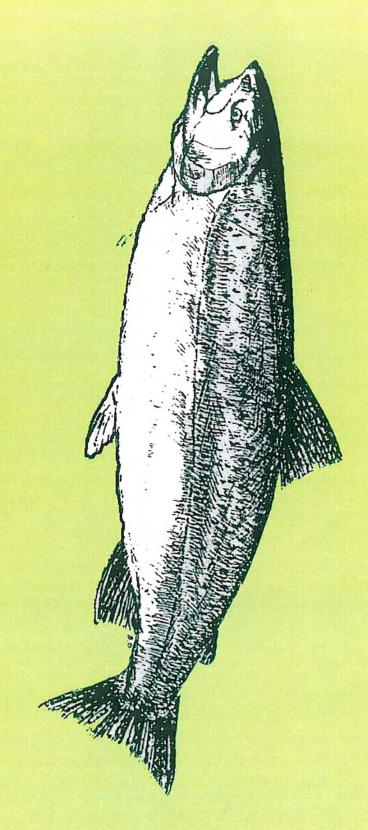
THIS IS A YIELD DISCUSSION



4 236	52 660	50000
7,492	53,970	48000
10,650	55,210	46000
13,710	56,450	44000
16,690	57,490	42000
19,540	58,380	40000
22,290	59,220	38000
24,920	59,980	36000
27,380	60,600	34000
29,690	61,030	32000
31,760	61,210	30000
33,610	61,370	28000
35,190	60,930	26000
36,400	60,280	24000
37,260	▶59,240	22000
37,630	57,820	20000
37,470	55,790	18000
36,750	53,150	16000
35,320	49,940	14000
33,180	▶ 45,820	12000
30,220	40,890	10000
26,400	34,920	8000
21,560	28,070	6000
15,630	20,070	4000
8,480	10,720	2000
YS	R	S
Sustained Yield	Kenim	cscapement

- 45,820(Return) 17,869 (Harvest) = 27,951 (Escapement) rate) =17,869 (Harvest) 12,000 Escapement will produce a Return of 45,820 X 39% (Exp 27,951-12,000 =15,951 will <u>not</u> be harvested Why?
- 22,000 Escapement will produce a Return of 59,240 x 39% (Exp 59,240(Run) - 23,100(Harvest) = 36,140 (Escapement) rate = 23,100 (Harvest) 36,140-22,000 =14,140 will <u>not</u> be harvested Why?
- 12,000 Escapement produces 33,180 Sustained Yield 22,000 Escapement produces 37,260 Sustained Yield harvested due to an exploitation rate of 39%. Difference in Sustained Yield of 4,080 Chinook that will not be
- bag limits, seasons and fisheries participation. average exploitation rate at 39%. In order to increase exploitation rates to harvest excess fish, there would need to be an increase in Why? There are limitations on ALL user groups which keeps the





# HARVEST RATES



# HARVEST RATES FOR ALL USER GROUPS

Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         22         9,779         18,668           37,370         1,605         2,283         621         91         13         6,966         12,139           42,820         1,705         3,363         626         130         28         7,990         18,638           42,820         1,705         3,361         246         130         28         7,990         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680           60,460         1,869         10,700         464         13         392         18,409         19,160           48,960         2,931         7,780         627         339         26         13,325         25,028           50,560         1,084         3,495         335 <th>CALIFORNIA DE CONTROL DE CONTROL</th> <th>Control of the latest and the latest</th> <th>and designation of the last of</th> <th></th> <th></th> <th></th> <th></th> <th>1 767</th> <th>58.546</th> <th>Moon</th>	CALIFORNIA DE CONTROL	Control of the latest and the latest	and designation of the last of					1 767	58.546	Moon
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Ha	0.0	923	198	0	0	191	484	50	29,370	2012
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Ha	0.4	16,148	7,831	5	1,243	593	5,596	880	36,650	2011
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Ha	0.0	14,021	7,471	21	865	539	4,567	558	30,510	2010
Total Run         Harvest         Kenni         Harvest         Use         Fishery         Harvest         Ha	0.4	15,809	9,662	4	1.189	859	3,839	256	38,190	2009
Total Run         Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         18,669           51,760         2,115         7,363         615         59         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680           60,060         1,869         10,700         464         13         392         18,409         19,160           48,020         2,038         7,944         389         45         294         8,449         19,160           48,060         1,784         3,495         33	0.3	19,258	11,508	15	1,362	653	5,203	517	52,180	2008
Total Run         Harvest         Kenni         Harvest         Use         Fishery         Harvest         Harvest         Harvest         Use         Fishery         Harvest         Harvest         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest <td< td=""><td>0.4</td><td>23,780</td><td>12,111</td><td>6</td><td>1,509</td><td>912</td><td>8,445</td><td>797</td><td>58,360</td><td>2007</td></td<>	0.4	23,780	12,111	6	1,509	912	8,445	797	58,360	2007
Total Run         Harvest         Kenni         Harvest         Use         Fishery         Harvest         Harvest         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271         41,290         1,487         8,834         2,227         10,188         26,271         41,290         1,487         8,834         2,227         13,223         33,539         13,239         13,239         13,239         13,2429         13,2429         14,236         4,561         13,223         33,539         13,2429         13,2429         13,2429         13,2429         13,2429         14,249         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         13,649         13,649         13,649         13,649         13,649         13,649         13,649<	0.3	28,247	16,642	11	1,034	2,782	6,840	938	74,450	2006
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,668           51,760         2,115         7,363         615         50         402         7,790         18,335           60,060         1,869         10,700         464         13         392         18,409	0.4	38,449	19,481	gard mind	775	1,958	15,183	1,040	96,880	2005
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271         13,290         1,218         14,536         4,561         13,223         33,539         13,539         13,539         13,223         33,539         13,229         13,223         33,539         13,229         13,2429	0.3	36,856	18,393	10	792	1,104	14,897	1,660	101,200	2004
Total Run         Harvest         Kenni         Harvest         Use         Fishery         Harvest         Harvest         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271         13,233         33,539         13,233         33,539         13,223         33,539         13,223         33,539         13,2429         13,223         33,539         13,2429 <td>0.3</td> <td>31,388</td> <td>18,746</td> <td>end and</td> <td>1,016</td> <td>1,240</td> <td>10,174</td> <td>200</td> <td>98,870</td> <td>2003</td>	0.3	31,388	18,746	end and	1,016	1,240	10,174	200	98,870	2003
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271         13,233         33,539           72,990         1,487         8,834         2,237         19,871         32,429         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         28         7,919         18,668           51,760         2,115         7,363         615         50         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,649           51,760         2,115         7,363         615         50         402         7,790         18,335           60,760         1,869         10,700         464         13         392         18,409         31,847           54,450         2,089         8,291         36         646         13,081         24,717           48,960         2,931 </td <td>0.3</td> <td>21,237</td> <td>13,272</td> <td>6</td> <td>606</td> <td>415</td> <td>6,511</td> <td>427</td> <td>66,420</td> <td>2002</td>	0.3	21,237	13,272	6	606	415	6,511	427	66,420	2002
Total Run         Harvest         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271         13,233         33,539           72,990         1,487         8,834         2,237         19,871         32,429         13,223         33,539           44,020         1,368         7,498         0         22         9,779         18,668         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649           51,760         2,115         7,363         615         50         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680           60,060         1,869         10,700         464         13         392         18,409         31,847           48,020         2,038         7,944         389         45         294         8,449         19,160           48,960         2,931         7,780         627         339         26         13,325         25,028	0.3	23,618	17,305	00	638	619	4,128	920	60,780	2001
Total Run         Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649           51,760         2,115         7,363         615         50         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680           60,660         1,869         10,700         464         13         392         18,409         31,847           48,020         2,038         7,944         389         45         294         8,449	0.3	19,990	15,721	6	410	270	2,531	1,052	50,680	2000
Total Run         Harvest         Kenai         Harvest         Use         Fishery         Harvest         Harvest         Exploit           77,850         630         13,619         1,834         10,188         26,271         13,233         33,539         13,233         33,539         13,223         33,539         13,223         33,539         13,223         33,539         13,223         33,539         13,223         33,539         13,223         33,539         13,223         33,539         13,2429         13,2429         13,2429         19,871         32,429         14,020         1,368         7,498         0         22         9,779         18,668         12,139         12,139         12,139         12,139         12,139         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         13,180         13,649         13,349         13,649         13,349         13,649         13,349         18,253         31,680         18,335         18,499         13,649         13,499         18,253         31,847         18,253         31,847         18,253         31,847         18,253         31,847         18,253         31,847         18,253	0.4	22,849	14,277	4	488	575	6,501	1,004	52,520	1999
Total Run         Harvest         Kenni         Harvest         Use         Fishery         Harvest         Harvest         Exploit           77,850         630         13,619         1,834         10,188         26,271         13,233         13,233         13,233         13,233         13,233         33,539         13,223         33,539         13,223         33,539         13,223         33,539         13,232         33,539         13,2429         13,223         33,539         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,2429         13,668         12,139         18,668         12,139         13,649         12,139         13,649         12,139         13,649         12,139         13,649         13,649         13,649         13,649         13,649         13,680         18,335         18,335         31,680         18,335         31,680         18,335         31,680         18,335         31,680         18,335         31,680         18,335         31,680         18,347         18,449         19,160         18,449         19,160         18,449         19,160         18,449         19,160         18,325         25,028 <td< td=""><td>0.3</td><td>13,997</td><td>8,110</td><td>2</td><td>271</td><td>335</td><td>3,495</td><td>1,784</td><td>50,660</td><td>1998</td></td<>	0.3	13,997	8,110	2	271	335	3,495	1,784	50,660	1998
Total Run         Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest           81,300         1,218         14,536         4,561         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649           51,760         2,115         7,363         615         50         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680           60,060         1,869         10,700         464         13         392         1	0.5	25,028	13,325	26	339	627	7,780	2,931	48,960	1997
Total Run         Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest           81,300         1,218         14,536         4,561         10,188         26,271           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649           51,760         2,115         7,363         615         50         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680           60,060         1,869         10,700         464         13         392         18,409         31,847           54,450         2,069         8,291         594         36 </td <td>0.4</td> <td>19,160</td> <td>8,449</td> <td>294</td> <td>45</td> <td>389</td> <td>7,944</td> <td>2,038</td> <td>48,020</td> <td>1996</td>	0.4	19,160	8,449	294	45	389	7,944	2,038	48,020	1996
Total Run         Harvest         Kenai         Harvest         Use         Fishery         Harvest         Ha	0.4	24,717	13,081	646	36	594	8,291	2,069	54,450	1995
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649           51,760         2,115         7,363         615         50         402         7,790         18,335           63,420         2,834         9,672         765         129         27         18,253         31,680	0.4	31,847	18,409	392	13	464	10,700	1,869	60,060	1994
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         Use         Fishery         Harvest         Harvest           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649           51,760         2,115         7,363         615         50         402         7,790         18,335	0.5	31,680	18,253	27	129	765	9,672	2,834	63,420	1993
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139           42,820         1,705         3,361         246         130         288         7,919         13,649	0.1	18,335	7,790	402	50	615	7,363	2,115	51,760	1992
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668           37,370         1,605         2,843         621         91         13         6,966         12,139	0.3	13,649	7,919	288	130	246	3,361	1,705	42,820	1991
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429           44,020         1,368         7,498         0         22         9,779         18,668	0.3	12,139	6,966	13	16	621	2,843	1,605	37,370	1990
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           77,850         630         13,619         1,834         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539           72,990         1,487         8,834         2,237         19,871         32,429	0.4	18,668	9,779	22		0	7,498	1,368	44,020	1989
Marine         ESSN         Gillnet         Pers.         Ed.         Sport         Total         Exploit           Total Run         Harvest         Kenai         Harvest         Use         Fishery         Harvest         Harvest           77,850         630         13,619         1,834         10,188         26,271           81,300         1,218         14,536         4,561         13,223         33,539	0.4	32,429	19,871			2,237	8,834	1,487	72,990	1988
Total Run Harvest Kenai Harvest Use Fishery Harvest Harvest 77,850 630 13,619 1,834 10,188 26,271	0.4	33,539	13,223			4,561	14,536	1,218	81,300	1987
Marine ESSN Gillnet Pers. Ed. Sport Total Exploit Total Run Harvest Kenai Harvest Use Fishery Harvest Harvest	0.3	26,271	10,188			1,834	13,619	630	77,850	1986
ESSN Gillnet Pers. Ed. Sport Total	Ra	Harvest	Harvest	Fishery	Use	Harvest	Kemi	Harvest	Total Run	Year
	Exploitation	Total	Sport	Ed.	Pers.	Gillnet	ESSN	Marine		
Drift			Inriver			Drift		Deep Creek		

Average 1986-2011

2.1%

12.8%

1.5%

0.8%

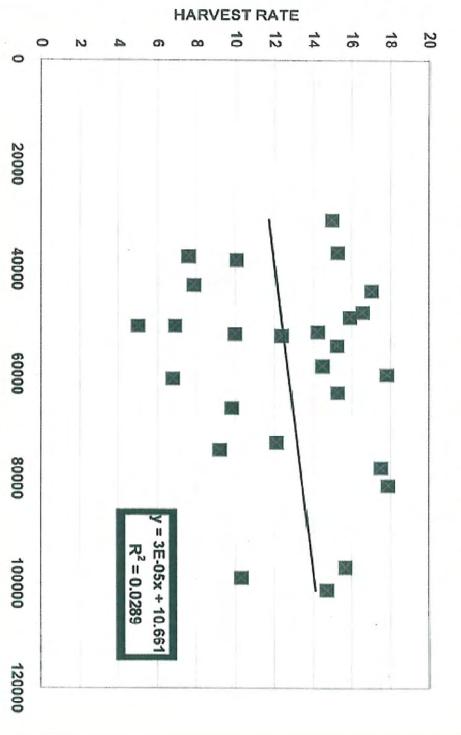
21.8%

39%



# HARVEST RATES FOR ESSN FISHERY





ESSN harvest rate is fairly constant.

You can see here over the years it ranges from 5% to 18% with an average of 13% regardless of total return.

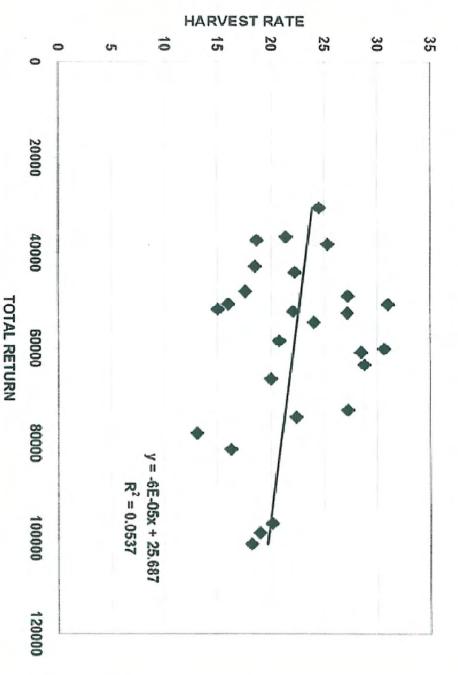
ESSN do not harvest at higher rates on lower runs.

TOTAL RETURN



# FOR IN RIVER SPORT FISHERY HARVEST RATES





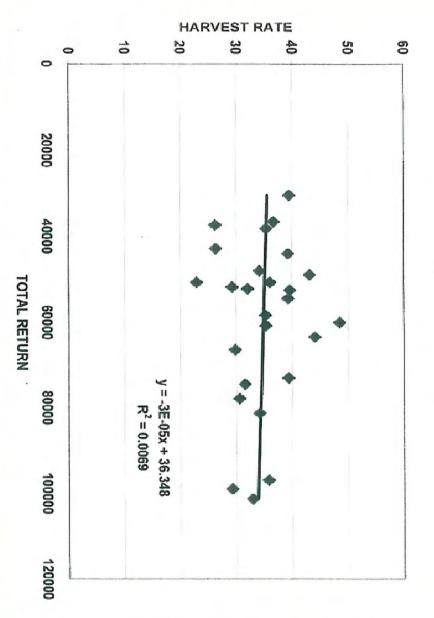
In river sport harvest rate is also fairly constant.

You can see over the years it ranges from 13% to 31% with an average of 22%



# FOR ESSN & INRIVER SPORT FISHERY HARVEST RATES





ESSN and In River
Sport fisheries harvest
at an average harvest
rate of 35% and is
constant across all total
returns measured.

(39% with ALL user groups fishing)

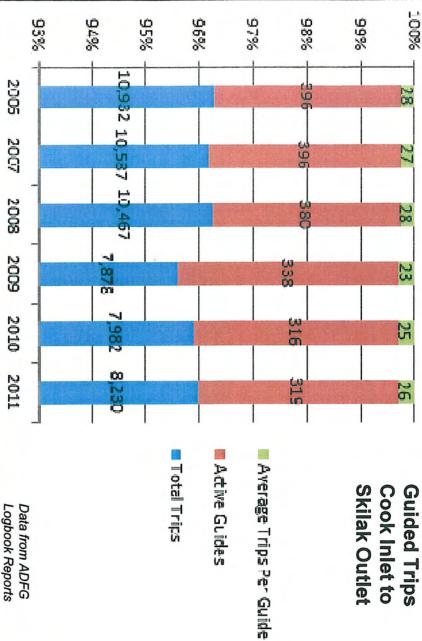
\*\*\*A total return of
22,000 Chinook with
ALL fisheries fishing
regularly will produce a
spawning escapement of
13,420.\*\*\*





# GUIDED TRIPS ON THE KENAI Z V H R





Skilak Outlet **Guided Trips** Cook Inlet to

Average Trips per

Guide does not

place. restrictions are in chinook

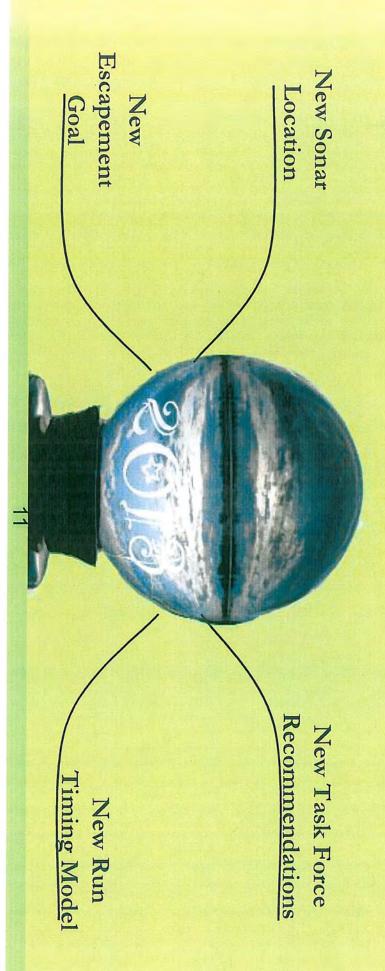
decrease when



# LOOKING AHEAD

Will we have a better crystal ball in 2013?

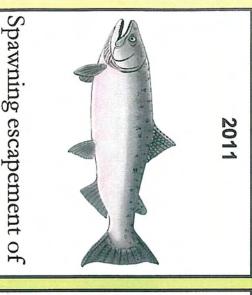
29,000 total run ALL fisheries could have fished normally with a 39% harvest 29,000. That is 100% error at a critical time in our fisheries. In 2012 with In 2012 ADF&G projected 14,000 but what really showed up in 2012 was rate and we would have had a 17,690 spawning escapement.



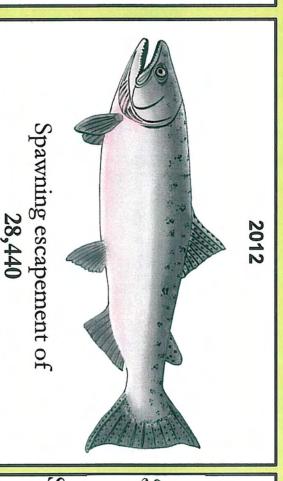


# SALMON ARE RESILIENT

Total Return is made up of 3,4,5,6 year old fish



20,290





2012 was a GREAT BUFFER for 2013



# 14 of 18

# Yetna River

- SEG set 90,000-160,000 sockeye
- Part of the Susitna Drainage
- 0 accept smaller returns to the Yetna Where there were large returns in Kenai/Kasilof, ADF&G was willing to
- SEG became an OEG 75,000-180,000 sockeye
- 0 more harvest opportunity to the more productive stock If there was over 4 million sockeye returning to Kenai/Kasilof this provided
- Yeta sonar counter is no longer being used

# Nushagak River

- SEG set 340,000- 760,000 sockeye
- Part of the Bristol Bay system
- smaller runs to Nushagak When there were large runs to Wood River, ADF&G was willing to accept
- SEG becomes and OEG of 235,000 sockeye
- 0 Nushagak sockeye were still sustainable at the lower OEG level
- 0 The OEG was set to provide more harvest opportunity to the more productive

TRADE

OFFS

An OEG may be set lower than an SEG in order to harvest a larger more producing stock productive stock, without threatening the sustainability to the lower

> A Lower Bound OEG has Been Done Before

Upper Cook Inlet Board of Fisheries Task Force

# Final Recommendations for Proposal 249 February 14, 2013

# SPECIAL NOTES:

dialogue only and will not be considered part of the official Board of Fisheries record. Fisheries (board) meeting begins on March 19, 2013. The comment page will serve as mechanism for This website will remain active until the Statewide Finfish and Supplemental Issues Alaska Board of Upper Cook Inlet Task Force Website: http://www.adfg.alaska.gov/index.cfm?adfg=ucitaskforce.main

of Fish and Game, Boards Support Section, P.O. Box 115526, Juneau, AK 99811-5526 by the Alaska written public comments can be submitted via fax at (907) 465-6094 or mailed to the Alaska Department submitted later as record copies and will be part of the board's record for the March meeting. Any meetings posted at http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2012comment procedures outlined in the legal published notice for the 2012-2013 board regulatory Board of Fisheries, Statewide Finfish and Supplemental Issue meeting comment deadline of March 5 2013/notice11-2-12.pdf. To be included in the books prepared for board members before the March Comments about this recommendation or related issues may be submitted to the board via the public (All Alaska Board of Fisheries public comment standards apply.) 19 24, 2013 meeting starts, comments must be received by March 5, 2013. Comments may be

# Inseason Management If Run Is Projected To Be At Low Return Levels:

- escapement goal (SEG) take the following actions: If hy July 21 the late-run king salmon are projected to fall below the 15,000 sustainable (Note: No vote was taken on changing to the July 21.)
- 1) Make the SEG an optimal escapement goal (OEG) of 13,000 30,000 to allow some latitude for the department to assess uncertainties in run timing variability (Note: No consensus. Task Force voted 5 in favor 4 against for OEG)
- Restrict the inriver sport fishery to no bait.
- Sin Change the East side setnet fishery (ESSN) fishery to be managed by emergency order (EO) authority to harvest of sockeye salmon. Friday 36-hour window will remain in place. Consensus on number 3.)

# Consensus to either:

- Pairing no bait in the sport fishery with halving all available hours for the ESSN depending upon tier. (Note: No consensus. Task Force voted 5 in favor, 4 against.)
- Ģ. 36-hour cap on ESSN hours when restricted. (Note: No consensus. Task Force voted 4 in favor, 5 against.
- sport fishing. (Note: No consensus. Task Force voted 5 in favor, 4 against.) Should there be a pairing of restrictions when the river goes to catch and release for

# **SNOITAO** NHWWW LYZK ŁOKC

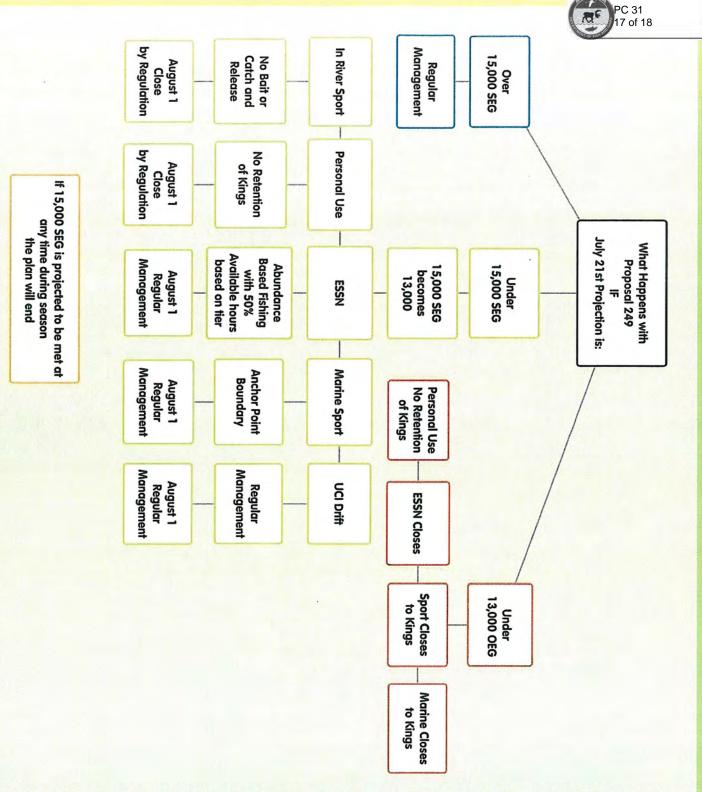


- Pairing catch and release sport fishing with 12-hour cap on ESSN hours. (Note: No
- Pairing catch and release sport fishing with 18-hour cap on ESSN hours. (Note: No
- Restrict the marine sport fishery north of Bluff Point to no bait.
- Change the no-bait boundary to be the South Anchor River conservation marker (Note: No consensus. Task Force voted 6 in favor, 3 against.)
- S Close the personal use fishery to king salmon harvest. (Note: No discussion or vote on closing the PU fishery to retention of king salmon.)
- If the department projects that the OEG of 13,000 will not be met then all fisheries will close. (Note: No consensus on OEG.)
- On August 1, the following actions will take place:
- The inriver sport fishery will close by regulation.
- The commercial fishery will revert back to regular management plan with department oversight to ensure late-run king salmon escapements will be met
- a. Amend No. 2 to include reverting back to regular management plan. (Note: No consensus. Task Force voted 5 in favor, 4 against.,
- than 15,000 SEG, restrictions shall end If at any time prior to August 1, the department's assessments project an escapement greater (Note: Consensus on this point of the plan as written.)

# Sunset after 2013 Season

of Fisheries Meeting. All task force members agreed that any provisions adopted as Proposal 249 will sunset after the 2013 season so that new ideas will be considered at the 2014 regular Upper Cook Inlet Board

6





sport catches of King Salmon exceed commercial catches of king salmon by 10% king salmon after July 20th will be extrapolated. The sport fishery will close by emergency field order if each week after July 1. For proposes of late July Sport Fish management, commercial set net catches of commercial catches on set net beaches 244-20-30-40 during the (2) regulatory scheduled 12-hour periods Creek saltwater fishery (to be determined by in-season sport fish catch rates) shall be on 1:1 basis with 1976 King Salmon Plan states that Sport catches of late run king salmon in the Kenai River and the Deep 1974 Established that Russian River Sockeye will be managed primarily for sport fishery

allowed to fish from June 25 to August 15. 1978 The BOF instituted the Upper Cook Inlet Salmon Management Plan. Commercial fishers were

the run. The minimum escapement into the Kenai was 350,000-500,000 fish. 1979 Sockeye Management Plan determined Sport fish harvest percentage allowed based on the size of

1981 Kenai Coho Declared a Sport Fish Priority.

1993 Area Registration requirement for Setnet Permits in Upper Cook Inlet

the return, the larger the escapement tier. We now have under 2.3 million, 2.3 - 4.6 million, and over 4.6 1999 The Kenai River was moved to three tiered Management Plan for Sockeye escapements. The larger the same time, advanced the closing date from August 15 to August 10 for the protection of Coho Salmon. Salamatof and East Forelands setions to allow for passage of King Salmon into the Kenai River and at 1997 The opening date for the set gillnet season was moved from June 25 to July 8 in the Kenai

hour period between August 1 and August 7. 2002 BOF limited the set gill nets season when it prohibited set gill nets from fishing for more than one 24-

million as our current tiers which have been adjusted for the Didson counts.

August 1st the daily harvest is less than 1% of the season cumulative sockeye harvest for two consecutive 2005 Eliminated in-season windows after August 1st and implemented season closer if at any point after

under the Pink Salmon management plan. Adopted windows under the Umbrella Plan of the Upper Cook 2008 Season Closing Date was moved from August 10 to August 15 to harvest pinks and late run sockeye Inlet Salmon Management plan to provide "predictability" in the sport and personal use fisheries.

specified that during runs of 2.3 and 4.6 million sockeye the 24 hour floating period will be a fixed date on 2011 Established an allocation of sockeye to personal use and sport fisheries in Upper Cook Inlet Tuesday. Drift Fishery decoupled from Set Net Fishery. Increased Kenai inriver sport allocation by 33 percent, specified expansion of a window to 36 hours, and





# COOK INLET

# AQUACULTURE ASSOCIATION

40610 KALIFORNSKY BEACH ROAD KENAI, AK 99611 (907) 283-5761 FAX: (907) 283-9433 email: info@cisanet.org http://www.cisanet.org

March 5, 2013

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

<u>Proposal 215</u> - 5 AAC 39.205. Criteria for the allocation of fishery resources among personal use, sport, and commercial fisheries.

Position: Opposed

This proposal seeks to prohibit the 100% allocation of fish returns to any one user group. It also would ban aquaculture associations from obtaining all their cost-recovery needs from one Special Harvest Area (SHA) when doing so would prevent common property commercial fishing within the SHA.

Managing the harvest of fish returning to hatcheries is addressed in regulation in Chapter 40, *Private Nonprofit Salmon Hatcheries*. Aquaculture associations may harvest fish for cost recovery only within their designated SHAs. Cost-recovery harvest goals are based on a balance of Aquaculture association needs and common property fishing concerns in each area.

If adopted, this proposal would make it difficult for aquaculture associations to achieve costrecovery goals, which would affect the ability to continue future production. It would also make it difficult for aquaculture associations to recover costs for developing new programs and improving existing programs.

This proposal falsely states that the entire catch of sockeye salmon in Resurrection Bay has been allocated to the Cook Inlet Aquaculture Association (CIAA). An accurate portrayal of the allocation in Resurrection Bay follows:

1. Over the last five years, there has been a common property fishery every year on the sockeye salmon returns to Resurrection Bay (see table below). The common property allocation has ranged from a low of 7% to a high of 64%. Additionally, a commercial fishery for Resurrection Bay sockeye did occur in 2008 and 2011.



	,2008	2009	2010	2011	2012
Fishery Type Commercial Sport Cost Recovery Escapement Total	54,191 5,277 33,036 13,436 105,940	0 10,248 143,293 13,318 166,859	0 4,482 21,881 12,884 39,247	56,111 8,568 150,853 13,220 228,752 30%	0 10,000 83,453 12,439 105,892 11%
% Common Property	64%	7%_	17%	3070	11 /0

- 2. In 2009, CIAA did project the entire catch of sockeye would be required for cost recovery, but did not project the entire catch of sockeye would be required for cost recovery in 2010 and 2012. Actual returns were much lower than projected returns for these two years.
- 3. In 2008, 2009, 2010, 2011, and 2012 cost-recovery harvests were conducted in 2 to 4 SHAs-Resurrection Bay, Tutka Bay, Leisure/Hazel and Kirschner Lake. In 2011, because the cost-recovery goal was met at Resurrection Bay and Tutka Bay, costrecovery harvests were not conducted at the Leisure/Hazel and Kirschner Lake SHAs. All fish returns to these areas were available for the common property fishery.

CIAA is in the process of restructuring several hatchery projects and recognizes that the organization has relied heavily on Resurrection Bay sockeye returns to provide revenue to cover the operating costs for its facilities. Returns to these "new" hatchery programs will provide sufficient returns for additional harvest. Changes in the hatchery projects are:

Change brood sources for other sockeye salmon programs.

In addition to the Resurrection Bay returns, CIAA has sockeye returning to the SHAs at Tutka Bay Lagoon, Leisure/Hazel Lake and Kirschner Lake. Since 2004, when CIAA lost the use of the Tustumena stock as a brood source for these programs, CIAA has been using the Hidden Lake stock. This stock has not performed well in terms of ex-vessel value due to late-run timing and smaller size. Recognizing this, CIAA has taken steps to change the source of the brood stock to English Bay Lakes stock, which returns earlier and at a larger size, thereby increasing the economic value of these returns.

2. Alternative species for cost recovery harvest.

CIAA has reopened Tutka Bay Lagoon Hatchery for pink salmon production. Additionally, CIAA is investigating the operation of the Port Graham Hatchery for pink salmon production. These two facilities will provide two additional areas as well as a different species where CIAA can license access to SHAs and thereby reduce the reliance on the Resurrection Bay Fishery.

CIAA does not rely solely on sockeye returns to Resurrection Bay to provide all of its operating revenues and we are working to reduce the reliance on the Resurrection Bay sockeye returns for operating revenues. But, due to the life cycle of both the sockeye and the

PC 32 3 of 4

pink salmon, the benefits of our program changes to all harvesters will not be noticeable for another couple of years.

Gary Fandrei,

Executive Director

Lary Fandrei

Cook Inlet Aquaculture Association

# FAX

То:	Board Support Section	on, ADFG	From:	Caroline Che	rry
Fax:	907-465-6094		Pages:	4 (meluc	ling cover)
Phone:			Date:	3.5.2013	
Ret	BOF Comments		CC:	Manual Ma	
Urgent	X For Review	Please Con	nment [	Please Reply	Please Recycle
Comments	<u> </u>				

Attached please find Cook Inlet Aquaculture Association's comments to BOF Proposal 215.





10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, & the Gulf of Alaska

Formal comments of the Alaska Board of Fisheries 2012/2013 proposed changes in the statewide fintish and supplemental issues.

The positions and comments listed here represent those of the Native Village of Eyak Tribal Council and professional staff within the Native Village of Eyak's Department of Environment and Natural Resources. We thank the Board for allowing us the opportunity to voice our collective opinions on the proposed regulation changes. We will have numerous representatives available at the March meeting for further discussion on our positions and views.

Proposal	Position	Comments
216	Oppose	
217	Oppose	Although NVE acknowledges the statewide King salmon crisis, the measures proposed here are arbitrary and should not be applied to salmon fisheries statewide. Management actions should reflect relevant and sound information and be stock specific.
219	Support	If these terms/criteria are used to manage State fisheries, then definitions should be provided to facilitate discussion and understanding among managers and stakeholders.
220	Support	With new technology, managers should allow every possible avenue for resource users to complete registration requirements. Furthermore, coded regulations should reflect actual management practices. However, we encourage the continued use of registration by mail for those users without access to telephone, facsimile, or e-mail.
222	Support	Although we generally do not support greater complexity in regulations, carrying personal identification is fairly standard and improves managers' ability to ensure compliance.
224	Support	We support the use of current technologies to disperse EO information. However, ADFG should be required to disperse EO information by all reasonable means. Resource users without internet access may not receive this information if this is the only method used for dispersion of EO announcements. Change the following language used in the regulation, "by one or more of the following means if possible:"
226	Support	Area regulations should reflect statewide regulations to avoid unnecessary enforcement situations.



Proposal	Position	Y	
· · · ·	Position	Comments	BOARDS
227	Support	The department should have the authority to decrease si methods for conservation reasons.	port proxy limits and
228	Support	The practice of "high grading" is wasteful and offensive to subsistence way of life. It is commonplace for anglers to the point of recovery only to be released when a larger fi	retain and strong fish were
229	Support	We support any regulation that improves harvest account blatant abuse of annual limits, especially for sport fish. We going on statewide, there is an even greater need to tight intentional and unreported overharvest.	lith the king column autois
230	Support	See comments, proposal 229	· · · · · · · · · · · · · · · · · · ·
231	Undecided	While we support regulations that hinder big, out of state abusing the system and taxing our resources, this definition harm individuals who take visiting friends or family out on should discuss a possible space/time amendment to this definition.	n could unintentionally
232	Support		
233	Oppose		
234	Oppose	Although NVE recognizes that lead shot poses a threat to vegulation is too vague and restrictive concerning affected	vildlife, this proposed location.
235	Support	Voluntary, Post-season random harvest reporting for states short to accurately account for harvests. Insidiously, this in biased information is then used to affect management, EO to other fisheries. Sport fisheries should be subject to the state of the subject to the subject t	actions, and allocations actions, and allocations ame scrutiny as other
243	Support		
247	Oppose	Commercial fishing has been the customary fishery in this a should not be compromised to benefit sport fishing.	rea for generations and
248	Support	We support regulatory actions that add clarity and facilitate regulations.	adherence to



Dave & JoAnn Wichers PO Box 1728 Kenai, Alaska 99611

March 4, 2013

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



Dear Board of Fish Members,

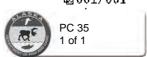
My name is JoAnn Wichers, my husband and I have been set net fishing on K-Beach since 1985. When we first started fishing we were allowed many emergency openings and many of those were 24 hour periods. Over the years we have seen commercial fishing time get smaller and smaller and have had more and more restrictions applied, especially for those of us who set net north of the Blanchard line. Like many set netters ours is a family operation. We have raised two sons who fished with us on K-Beach, one is currently still set net fishing in Cook Inlet and our oldest son joined the military. He felt it would provide more stability, although last summer 2012 he took military leave to come and help us fish for the summer, he fished only one day before we were shut down. The unique way of life that the set net small business provides, is hard to get out of your blood. It is more than the money, it is a way of life.

The summer of 2012 was the most difficult we have experienced. We did not even come close to covering our expenses. It was financially devastating, on top of the stress of not knowing if or when we would be able to fish, all around us people were harvesting sockeye salmon. We wrote letters, made phone calls, and worked on educating the public. I walked the beaches as the personal use fisherman continued to haul in the sockeye, while we waited. It was extremely stressful and eventually we had to release several of our crew. In all of our years of fishing we never had to release crew members. However, we cannot go back and recoup our past losses, but we can try and prevent them from happening in the future. Out of devastation came education. After looking over the details and background research, my husband and I both support proposal 249 and the efforts put forth by the Task Force.

To avoid a repeat of the 2012 season, we respectfully request that the Board of Fish members support the efforts of the Task Force and vote yes on proposal 249 as it stands. This will help to ensure a harvestable surplus for future generations of commercial, personal use and sport fisherman.

Sincerely,

Dave & JoAnn Wichers
East side Set netter Cook Inlet



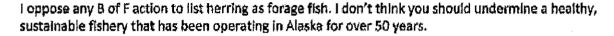
Alaska Department of Fish and Game

**Board of Fisheries** 

March 19-24, 2013 Meeting

Proposal 243

Oppose



**BOARDS** 

The statewide harvest has recently been over 50,000 tons, which at \$1500/ton makes it a 75 million dollar fishery. Hundreds of Alaskans are employed in this fishery.

Herring stocks have been stable in Sitka, Kodiak and Bristol Bay. Prince William Sound is poised to recover from the 1989 debacle. Exploitation rates are 10 to 20 percent of the biomass.

Please allow this well managed fishery to continue unhampered.

Thank you,

Ken Jones

907 235,6417

# **ALASKAN**



# WILDERNESS OUTFITTING COMPANY



BOX 1516 • CORDOVA, ALASKA 99574 • 907-424-5552 • FAX 907-424-5564 • E-máli: Info@alaskawilderness.com

March 5, 2013

ADF&G, Boards Support Section Attn: Monica Wellard P.O. Box 115526 Juneau, AK 99811-5526



(Board Generated Proposal 247)

Alaskan Wilderness Outfitting Company, a lodge located on the Tsiu River operating since 1986 is not in support of Proposal 247 as written. We are in favor of reasonable and responsible change that will enhance the sport fishery while keeping the traditional commercial harvesting in tack.

Sincerely yours,

Tom and Katie Prijatel, Owners ALASKAN WILDERNESS OUTFITTING

PLOATING CABINS REMOTE LODGES UNIQUE COMBINATIONS
OUTPOST CABINS

PISHING HUNTING

www.alaskawilderness.com



PC 37



606 Forest Hwy. 10 \* P.O. Box 418 \* Yokutot, Alaska 99689 Phone (907) 784-3238 \* Fax (907) 784-3595 \* www.ytttribe.org

Board of Fish Chairman Johnstone and Board members

Subject: Yakutat Tlingit Tribe Opposition to board proposal #247

Please find attached Yakutat Tlingit Tribe Resolution 2013-03 explaining our reason for opposing the BOF generated proposal #247.

On February 29th 2012 The Yakutat Tlingit Tribe (YTT) opposed proposal #301 via YTT resolution#12-05. When the board agreed to vote the proposal down, we thought we would now have three years (as is the normal practice) before this same proposal could come back to the table. This would give us enough time to work with the City Borough of Yakutar (CBY), the sport lodge owners and commercial fishermen to come to a mutually agreed solution.

Last year the CBY sent the chief of police to the Tsiu to talk with sport and commercial fishermen and defuse any possible conflicts. The CBY has also committed to putting a building on the river and staffing with an officer to assist in keeping the peace. Some may think this a bit of "overkill", but that shows the commitment to allowing all the tax paying users to make their fall income without incident. We believe BOC proposal # 247 is premature because we are still in the process of working with the user groups for a beneficial outcome for all.

The fact that BOF generated proposal #247 would close waters to commercial fishermen while leaving all waters of the Tsiu River open to sportfishermen would not alleviate any conflicts, but only enhance them. YTT would argue that perhaps the BOF has unintentionally overlooked this possibility.

We respectfully request that the BOF do NOT pass BOF proposal #247 and allow the newly formed Tsiu River Stakeholders group to work on solutions that will be mutually beneficial to all users.

Thank you for your consideration.

Victoria L Demmert

Tribal President

Yakutat Tlingit Tribe

To preserve, maintain and protect the unique culture, land & resources of Yakufalf Tingle people. To moximize our recycl, health & well-being white creating economic development benefits to all trool members.



606 Forest Hwy. 10 \* P.O. Box 418 \* Yakutat, Alaska 99689 Phone (907) 784-3238 \* Fax (907) 784-3596 \* www.ytttribe.org



### **RESOLUTION 13-03**

# Opposing the Board of Fish Generated Proposal #247

A Resolution Opposing the Board of Fish Generated Proposal #247 to Close Waters in the Tsiu River for the Yakutat Salmon Fishery

WHEREAS, the Yakutat Tlingit Tribe (YTT) is the federally recognized governing body of the five tribal clans of the Yakutat area. The historical boundaries of the Yakutat tribes have extended from Strawberry Point in Controller Bay to Lituya Bay; and

WHEREAS, the traditional tribal lands of the Gaaly'ax Kaagwaantaan encompass the Tsiu River, stretching from approximately Strawberry Point to Icy Bay; and

WHEREAS, Yakutat fishermen have been fishing commercially on the Tsui River since 1932; and

WHEREAS, Yakutat tribal members and their families derive a majority of their livelihood from the rivers of Yakutat, including the Tsiu River. The depressed economy requires tribal members to fish more than one river in the Yakutat area in order to eke out a living; and

WHEREAS, the always impending threat of the Hubbard Glacier to close several rivers closer to the town of Yakutat requires the fishermen to keep established fishing camps away from this threat ensuring them a continuation of a fishing area; and

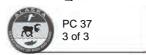
WHEREAS, there has been a substantial increase of fishing lodges and sportfishermen on the Yakutat area rivers including the Tsui River which has led to some real and supposed conflicts between the user groups; and

WHEREAS, the Board of Fish has chosen to arbitrarily close a part of the Tsiu to commercial fishing based on information received by them in private from a river guide which is not transparent as required for public boards; and

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,



Ø1004



Yakutat Tlingit Tribe

WHEREAS, passage of Board of Fish generated proposal #247 will be detrimental to the Yakutat Tribal members and the community of Yakutat and has not had enough study by the local Fish and Game department of the far reaching effects to regulations and harvest requirements where no biological emergency exists; and

WHEREAS, the Yakutat Tlingit Tribe has joined with other stakeholders (i.e. commercial fishermen, sport fishing lodge owners, Yakutat Fish and Game, City Borough of Yakutat, Yakutat Seafoods, and the Yakutat Tlingit Tribe) now known as the Tsiu River Stakeholders Working Group (TRSWG); and

WHEREAS, The TRSWG has committed to seek common ground in solving problems together by meeting on the Tsiu River prior to the commercial opening to work out common courtesy agreements between the user groups during the commercial season and also we have committed to meeting after the season to determine what worked well and any changes needed for the future season; and

WHEREAS, the City and Borough of Yakutat has committed to law enforcement presence during the commercial openings and intends to put a cabin on the Tsiu River for a continued presence; and

NOW THEREFORE BE IT RESOLVED, the Yakutat Tlingit Tribe most strenuously objects to the reasoning and precedent setting of proposal #247 and requests the Board of Fish do not pass proposal #247 and allow the newly formed Tsiu River Stakeholders Working Group to implement solutions which may someday be models for other rivers through out the State.

PASSED THIS 27 DAY OF FEBUARY, 2013

Victoria L. Demmert, Tribal President

### CERTIFICATION

This is to certify that I, Martha Indreland, am the Secretary of the Yakutat Tlingit Tribe and that Council consists of five duly elected members, and that this Resolution No. 2013-03 was considered and adopted at a duly convened meeting of the Yakutat Tlingit Tribe at which a quorum of the members was present and voting, and that taken was 5 For 0 Against, and 0 Abstaining.

ATTEST:

Martha Indreland, Tribal Secretary

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BOARDS

# Yakutat Alaska Fishermen's Alliance

Yakutat Alaska Fishermen's Alliance P.O. Box 93 Yakutat A, K 99689

## **PETITION**

TO The Alaska Board of Fisheries

### **WHEREAS**

Proposal 247 is an out of cycle board generated proposal to move the commercial fishing marker on the Tsiu river from its current location to halfway from its current location and the mouth of the Tsiu river (effectively cutting in half the area allowed for commercial fishing to occur on the Tsiu river).

We the undersigned petition the Alaska Board of Fisheries to **NOT** adopt proposal 247. It is our opinion that proposal 247 is unnecessary and is a serious breach of integrity of the Board of Fisheries. <u>We support commercial fishing in the Tsiu river under current regulations and are OPPOSED TO PROPOSAL 247.</u>

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4	Jesse Paulik	120.130X 256 Vakutyt AK968	2-21-13	:
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3	Candace Hills	9.0. Box 365 42Kutat, AK 99689	Cardoce Hills 2-214	3
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5	Melenda Baker	BOX 383 Yokustad, AK 99189	Yelende Baker	
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19	Lloyd I Brown	P.O. BOX 25174/A	Ray Dan	_
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	Name (printed)	Address (printed)	Signature	
22	FRED COBEMIS	BOX 33 YAKUTAT, XIL	Ind change	
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31	Billy Will jams	Box 96 Yak. B. T.	3,24 Wale	
32	SAM Johnson	Box-412 yakutatA	K Som Jehren	
33	Elizabeth Williams	Box472 YAKAtat, AK	Elizabeth Willyams	
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38	SUSAN BOWMANT	PO BOX 4DUAKS	Dissan Rouman	
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41	Karen Elton	POBOX 217	Karen Elton	
42	John F. Vale	P.D. Bay 193 Nok.	The CE	AEU
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P.O. Box 93

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58	LOREN CLARK	Box 331 YAK 99689	O You	
59	LARRY Powell	Box 159 Yakulat	Thrushell	
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61	Fred Brenner	224 YAKUTAT	Fred Brenes
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69	BRiAn A-Scheltz	BOX 89 YAKA19968	BAL9)
65	Eli Honlan III	Bax 183 Yak 9968	1 2
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75	Rachel Fraker	Box 284 Yakutat	Rachel L Frekey
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77	Lee Benson	Box 473 Yakotaf	Lefts_
78	WILLIAMRFEAKER	Box 265 Yakutat	Willserraky
79	Tiffany Bemis	Box 167 Yakulat	Manystens
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Yakutat Alaska Fishermen's Alliance
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103	Carrie Dramm	6B0X148 «	EL		
104	Cathy Bremner	B0X281	000		
105	EER MARSH	BOX 394	<u></u>		
106.	ELIJAH MAESH	( ( ( '			
107	ELIZABETH PICCAND	R.a Box172 Augges	the bed &	Tuen	
108	Ronnie & Convoise Sa	BOX 172 YOUNTAT AK 99689	2-1-d	- La	
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PC 38
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117	VIRGIL Schwarka	POBOX 1684 AKUTAT	Ving Waken	ļ
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119	James Woodbury	TR POB76 YaKAK	misselving	λ.
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Yakutat Alaska Fishermen's Alliance
P.O. Box 93
Yakutat A, K 99689

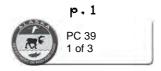
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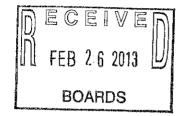
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# Adak Community Development Corporation

February 25th 2013.

ADF&G Board of Fisheries Boards Support Section P.O. Box 115526 Juneau, AK 99811-5526 (907) 465-6094 FAX



Re: Proposals 245 & 246

Dear Chairman Karl Johnstone,

Adak Community Development Corporation (ACDC) is a non-profit community organization dedicated to promoting scafood harvesting and processing capacity in Adak.

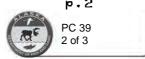
We support the adoption of Proposals 245 & 246 for the amending the management plan for Area O Red King Crab fishery found at 5 AAC 34.600-690 applying to the portion of state waters between 172° W longitude to 179° W longitude (the "Adak area".)

In amending the Area O RKC management plan, we ask that the Board do five things which would apply in a district of statewaters between 172° W longitude to 179° W longitude:

- 1- Modify the provision at 5 AAC 34.610(d) to limit vessel size to less than 60 feet.
- 2- Add a provision at 5 AAC 34.625 to establish a pot limit of 10 pots per vessel for the Adak area.
- 3- Remove the provision at 5 AAC 34.628 preventing a person from fishing groundfish with pot or longline gear for 30 days prior to the opening of the RKC fishery in the Adak area.
- 4- Modify the provision at 5 AAC 34.610(a) to allow the commissioner flexibility to open the fishery prior to October 15<sup>th</sup> in the Adak area.
- 5- Modify the provision at 5 AAC 34.640(b) to allow tank inspection in Adak for vessels participating in the Adak area RKC fishery.

Items I & 2 are the core of Proposals 245 & 246 which provide an opportunity for the Commissioner to manage a small Red King Crab fishery in state waters in the area around Adak

Items 3-5 are minor technical amendments to the Area O RKC management plan that are needed for safety and efficiency in the context of an under 60' vessel fishery.



#### Background

Historically, there was a large red crab fishery in the Adak area prior to the adoption of a federal Fisheries Management Plan (FMP) for crab. The resource collapsed and no red crab fishery has been conducted under federal management the waters between 172W and 179W degrees longitude.

Given the lack of fishing history under the federal FMP in our Adak area, the waters east of 179W were deliberately left out of the federal Crab Rationalization catch share program. As such it is an open access fishery and the only effort controls are the vessel length and pot limits found in 5 AAC 34.600-690.

#### Conservation Problem

This poses a conservation problem that makes it difficult for ADF&G to contemplate opening a fishery in the area with a modest GHL. The only pot limit for Area O is a 250 pot limit for the Petrel Bank red crab fishery. The vessel length limit for the Adak region is 90 feet.

There were over 100 vessels between 60 and 90 feet licensed for pot gear in the 2011 CFEC database. With no further effort limitations on size and number of pots, it would be impossible for ADF&G to manage within the GHL on a slowly rebuilding red king crab stock in our area.

We believe there is enough resource for a small red king crab fishery, but it must be managed carefully with tight effort controls on vessel size and number of pots to avoid exceeding whatever GHL ADF&G sets in order to be sustainable.

#### Minor Technical Fixes - Rationale

In addition to the core items (vessel size and pot limits) in Proposals 245 & 246, we asked that 3 minor technical fixes be addressed at this time.

The first is the "Operation of other gear provision". This provision was repealed in the Bristol Bay area, and is not found in the management plans for the Alaska Peninsula or Kodiak area.

The second is the "Start date". The October 15th date may make sense for the federal waters fishery in the Petrel Bank District, but it shouldn't apply to a small boat fishery in statewaters.

The third is the "Tank inspection". It doesn't make sense for small local vessels to have to travel from Adak to Dutch for a tank inspection to fish in the Adak area. The Commissioner should have the authority to allow tank inspections in Adak or to waive the inspection requirement.

### RKC Management Plan Framework for Adak Area Needed

The existing Area O King Crab management plan is focused on the federal waters Golden King crab and the Petrel Bank RKC fisheries. It fails to provide a framework for managing a rebuilding RKC stock in state waters around Adak. Adak needs new fishing opportunities to have a viable fisheries dependant community. Setting up the management framework in the 5 AAC 34 Sections 600-690 is an important foundational step to providing that opportunity.

Setting effort controls in advance of an opening of a fishery that has been closed for decades doesn't re-allocate from anyone since there are no current participants with a dependence on the resource.

Managing this fishery as a small vessel, slow paced fishery at a somewhat different time of year from the large Bristol Bay RKC fishery provides an opportunity to access live crab markets which could add value to the fishery.

Thank you for your consideration of our request.

Sincerely,

Rick Koso, President

Adak Community Development Corporation

PO Box 1943

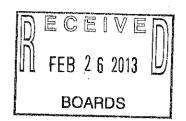
Adak AK 99546



February 26, 2012

ADF&G Board Of Fisheries

PO Box 115526 Juneau, Alaska 99811-55266



Re: Proposal 162 - Unalaska Bay Trawl Closure

To Whom It May Concern;

I support Proposal 162 to the Board of Fisheries, to close Unalaska Bay to trawl fishing. I have worked in all areas of the fisheries and lived at Unalaska Island since 1982. I commercial fished as a small boat fisheries for seven years and subsistence fished for 30 years. My family counts on subsistence as a mandatory part of their food gathering here and Halibut IFQ's and the small boat Crab Fisheries has been a part of my annual income to help my family as well.

I have witnessed a tremendous decline in fish and game in the surrounding Unalaska Bay waters since my arrival in 1982. I have witnessed several times while fishing on a 32' Bristol Bay boat , factory trawling in the mouth and head of Captain's Bay, one of Unalaska island's most important resource for subsistence and small boat commercial fisheries. I initially called F&G when I first saw this occur back in 1994 and was horrified that there was no regulations set against this as they were trawling right over our IFQ lines for halibut. It also made a deep impression: these larger vessels would slowly destroy the ground bottom feed and that, not only small boat fisheries in halibut and crab would be ruined for myself and future generations, but also that it would drastically reduce the eco-tourism sport fishing industry of Unalaska for halibut charters and small boat recreation.

As the Bering Sea is known for its dangerous currents, winds and seas, small boat fishing can not safely occur out in open waters. Protected bays/ inlets are our only way to continue these local fishing industries and traditions.

I have discussed this issue with fellow fishermen and community members and have not met one that disagreed. They also support this cause wholeheartedly and the local population at Unalaska hopes that you will support proposal 162 with great enthusiasm.

Regards,

Carolyn Reed, 30 year resident of Unalaska/Dutch Harbor

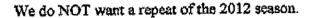


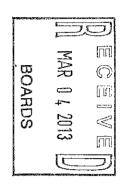
Alaska Board of Fisheries Statewide Finfish and Supplemental Issues March 19-24, 2013

Subject: Comments Regarding the Upper Cook Inlet Task Force Recommendations

I support the recommendations of the Task Force and Proposal 249.

Also, I do NOT support any pairing of restrictions of the in-river King fishery with the salt water Sockeye fishery. They are two species and need different management approaches. I support giving our local biologists the flexibility to manage the fishery. They should not have to adhere to a hard and fast management plan, when they are aware that it's not working, or they are aware of a late run.





On a separate note:

I would like the Board of Fisheries to meet in Kenai for the Board of Fisheries meetings regarding Cook Inlet in 2014.

I would also like to see guides restricted from fishing in the spawning holes for Kings. The guides have these spawning holes mapped, sit on them and fish with clients, and then wonder where the run went. ADF&G also has these holes mapped and could make them off limits.

Thank you,

Richard C. Mc Gahan, Sr. 59 year commercial and sport fisherman 54025 Kenai Spur Hwy. Kenai, Alaska 99611

907 252 1134

PC 42

CREATED BY: Agron D Seen PRINTED ON: September 24, 2012 VIEW ONLINE: http://www.causes.com/actions/1881923

# PETITION: Add Pacific Herring to the State of Alaska's Forage Fish Mangement Plan

To: Alaska Board of Fisheries

To the Board of Fisherles through Chairman Johnstone:

I support any regulatory change that would add Pacific herring (Clupea pallasii) as a forage fish, and to be managed as such. The existing administrative code (5 AAC 39.212.) fails to include all species of forage fish indigeneous to the waters of Alaska, and Pacific herring are a keystone species. The board recognizes that abundant populations of forage fish are crucial to sustain healthy populations of commercially important salmon, groundlish, halibut, and shallfish species. Please add Pacific herring to the State of Alaska's Forage Fish Mangement Plan. Failure to do so will compromise the State of Alaska's Pacific herring stocks.

# 40 SIGNATURES

	NAME		COUNTRY	POSTAL CODE	DATE SIGNED
1	Aaron D Bean	:	United States	99835	Sep 09, 2012
2	Melliesa Carvera-Bean	1	United States	99835	Sep 09, 2012
3	Sarah Moore		United States	56288	Sep 09, 2012
4	Dan W. Beer		United States	99705	Sep 09, 2012
5	Aubrey Gamble		United States	94309	Sep 09, 2012
6	Laura Bagley Maliula	•	United States	99835	Sep 09, 2012
7	Helan Dangel		United States	99835	Sep 09, 2012
8	David Harrison		United States	99508	Sep 09, 2012
9	Laura Lubich Bommarito C	Mauder	United States	63129	Sep 09, 2012
10	Elizabeth Green	,	United States	97303	Sep 09, 2012
11	Holly Foss		United States	81147	Sep 09, 2012
12	Melissa Bella		United States	63687	Sep 09, 2012
13	Carl Banston		United States	00025	Sep 09, 2012
14	patricia j tonkin	MECEIVEN	United States	99835	Sep 09, 2012
15	Heather Bremner		United States	98835	Sep 09, 2012
15	Sue Keene	MAR 0 1 2013 19	United States	99925	Sep 09, 2012
17	Eric Morales	,	United States	99835	Sep 09, 2012
18	Kerry Roy	BOARDS	United States	77339	Sep 09, 2012
18	David Kitka	Standard Contraction of the Cont	United States	99835	Sep 10, 2012
<u>.</u> 20	Dana Benton		United States	99835	Sep 10, 2012
21	Johnny Dungen Jr	•	United States	99635	Sep 11, 2012
22	Sanny Grapiey		United States	99835	Sep 12, 2012
22 23	Douglas Bartels		United States	99835	Sep 14, 2012
23	Traci Washausan	,	United States	99836	Sep 16, 2012
#+ 25	Cobum Della	ı	United States	99950-0340	Şep 16, 2012
26	Robert Young		United States	99654	Sep 16, 2012
%D	CONCIL 1 April				

	• • • • • • • • • • • • • • • • • • • •	COUNTRY	POSTAL CO	2012
	NAME	United States	97007	Sep 16, 2012
27	Kirn White	United States	97016	Sep 16, 2012
28	Aliola Ford	United States	99623	Sep 15, 2012
29	Reit Morgan Adair,	United States	97023	Sep 17, 2012
30	Bernadette Allen		99835	Sep 17, 2012
31	Kitty Wilson	United States	62901	Sep 17, 2012
32	Joseph Wilson	United States		Sep 17, 2012
33	Aj Wilkinson	United States	47711	
34	Frederick O. Disen, Jr.	United States	99950	Sep 17, 2012
35	Shella DeLapp	United Slates	80033	Sep 17, 2012
36	Rob Yates	United States	98284	Sep 18, 2012
37	Kayla Gray	United States	30721	Sep 18, 2012
38	Jode K Worlman	United States	98644	Sep 16, 2012
39	Melodie Bernatis	United States	80102	Sep 18, 2012
40	Brenda Lyons	United States	53563	Sep 19, 2012





# Add Herring to the Forage Fish Mangement Plan

Sponsored by: Aaron Bean Sitka Alaska 99835

About the petition

To the Board of Fisheries through Chairman Johnstone: I support any regulatory change that would add Pacific herring (Clupea pallasti) as a forage fish, and to be managed as such. The existing administrative code (5 AAC 39.212.) falls to include all species of forage fish indigeneous to the waters of Aleska, and Pacific herring are a keystone species. The board recognizes that abundant populations of forage fish are crucial to sustain healthy populations of commercially important salmon, groundfish, halibut, and shellfish species. Please add Pacific herring to the State of Alaska's Forage Fish Mangement Plan. Fallure to do so will compromise the State of Alaska's Pacific herring stocks.







61 signatures using the online tools at iPetitions.com

Printed on 09-24-2012



# Signatures

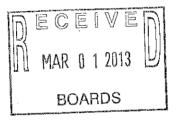
	Name: Heather Riggs on Aug 03, 2012 Comments: Absolutely	
2.	Name: Sryen Whitson — on Aug 03, 2012 Comments: I live in Sitka, Alaeka and have seen first hand how depleted the harring returns have been due to evertishing the industry benefits a very small percentage of those who live hera.	g and how .
3,	Name: Jeff Feldpauech on Aug 03, 2012 Comments:	
4.	Name: Katitleen Wendt on Aug 05, 2012 Comments:	
<b>5</b> .	Neme: Kathryn Jansen. on Aug 05, 2012 Comments:	
6.	Name: Daven Hafey on Aug 06, 2012  Comments: In a state which prides (seelf on sound fisheries management, it should be obvious that our fisheries are not we continue to harvest herring at current rates. Please acknowledge herring's critical role in our fisheries systems and new continue to harvest herring at current rates. Please acknowledge herring's critical role in our fisheries systems and accordingly. Lots of communities, subsistence fishermen, commercial fishermen, and aport fishermen in Aleaka are defined to make the right decision.	austainable if nanage it sending on
7.	Name: Karen Johnson — on Aug 06, 2012 Comments: As a lifetong commercial fisher from Sitks I find it perplexing why herring are not considered to be a forage t just assumed they always were, this needs to be changed now.	fish, I guess i
8.	Name; Michael D. Bricker on Aug 05, 2012 Comments:	
9,	Name: Michael Baines on Aug 06, 2012 Comments:	) ECEIVE
10.	Name: Heather Chapin or Aug 06, 2012 Comments:	MAR 0 1 2013 L <del>- Boa</del> rds
11.	Name: Jerry Snelling on Aug 06, 2012 Comments:	NOT the label of the second
12.	Name: Ted Wright on Aug 06, 2012 Comments: In complete agreement and believe this action is critical to the health of many fisheries, not to mention our	way of lifel
15.	Name: Rebecca Fritz on Aug 06, 2012 Comments:	
14.	Name: Kay Simmons on Aug 06, 2012 Comments: Please honor this request for all spacies of fish, and those of us who consume it as a way of life.	······································
15.	Name: Katherina Rusier-Davis on Aug 06, 2012  Commente: I lived in Silks, Ak. forever Syrs, and know that it is very important to protect all of the forage fish. It is the preserveing the Culture of an indigenous people.	1statep in

1B,	Name: Rebecca Bentley on Aug 06, 2012 Comments:	And the state of t
17.	Name: Carla Carrido on Aug 06, 2012 Comments:	
18.	Name: Margo Waring on Aug 07, 2012 Comments:	
19.	Name: Tips Brown on Aug 07, 2012 Comments:	
20.	Name: Josh Lawrence on Aug 07, 2012 Comments: stop over fishing the herring or all other fish will die within a few short years,	it will happen like a domino effect
21.	Name: Chad Titell on Aug 07, 2012 Comments:	The state of the s
27.	Name: Anonymous on Aug 07, 2012 Comments:	
23.	Name: Marian Alian on Aug 07, 2012 Comments:	
24.	Name: Jessicà Gill on Aug 09, 2012 Comments:	
25.	Namé: Jordana Hazam on Aug 09, 2012 Comments:	
26,	Name: Sarah Smith on Aug 09, 2012 Comments:	
27.	Nams: Ernestina Hayes on Aug 09, 2012 Comments:	DECEIVED
20,	Name: Tommy Joseph on Aug 99, 2012 Comments:	MAR 0 1 2013 U
29.	Name: Tom Gamble on Aug 09, 2012 Comments: save the herring	BOARDS
30.	Name: Charles Miyasato on Aug 09, 2012 Comments: LONG OVER DUE!!!!!!!!!!!	
31.	Name: John H. Littleffeld on Aug 09, 2012 Comments:	
32.	Name: Andra Martin on Aug 99, 2012 Commants:	Notes that the second s
33,	Name: Randy Katzenmeyer on Aug 10, 2012 Comments:	
**********	Name Tradestate O. Clock Jr. an Aug 10, 2012	

PC 43 5 of 6

	Comments: Gee, this is Sood obvious. If you don't trink naming are localisation to the need to read better books.		
35,	Name; Brandon Snyder on Aug 10, 2012 Comments:		
35.	Name: Sean Smith on Aug 10, 2012 Comments:		
37.	Name: Emestine Hanton Abel on Aug 10, 2012 Comments:		
38.	Name: Tanya Bonorden on Aug 11, 2012 Comments:	- Alleinann -	
39.	Name: Douglas C. Bartela on Aug 13, 2012 Comments:	······································	
40,	Name: Mergeret Nickerson on Aug 17, 2012 Comments: So right!		
41.	Name: Matt Love on Aug 17, 2012 Comments:		
42.	Name: Margaret Nickerson on Aug 23, 2012 Comments: Yes, do please add-on the Pacific herring		
43.	Name: Delice Calcote on Aug 27, 2012 Commenta: thanks you for adding herring as a forage fish to the Forage Fish Management Plan.		
44.	Name: Louise C Brady on Aug 27, 2012 Comments:		
45.	Name: Fred Moe on Aug 28, 2012 Comments:	£ The state of the	
46.	Name: Jerrod Galarin — on Aug 29, 2012 Comments: ADF&G don't understand herring behavior and their Eco system		6 E I V E   - 0 1 2013
47.	Name: Richard Didrickson on Aug 29, 2012 Comments:		O 1 2010 E
48,	Name: Michael Bricker on Aug 30, 2012 Comments:	The second secon	and the second place complete and second
49,	Name: Klity Wilson on Sep 06, 2012 Comments:		<del></del>
50,	Name: Tîna Sam - on Sep 06, 2012 Comments:		
51,	Name: Kara Koreis on Sep 08, 2012 Comments:		
52.	Name: Caitlin Gill on Sep 08, 2012 ,		

	Commenter
53,	Name: Kate Brunswig on Sep 08, 2012 Comments:
54,	Name: Rose Dobbs on Sep 08, 2012 Comments: Please add Pacific harring to the Alaska's Forage Fish Mangament Plan.
55.	Name: Pam Frenzel on Sep 08, 2012 Comments:
56,	Name: Patrick Gill on Sep 08, 2012 Comments: It's time!
57.	Name: Kim Elliot on Sep 18, 2012 Commenta: I support this concept and will be sending in some comments of my own soon.
58.	Name: Anonymous on Sep 18, 2012 Comments:
59,	Name: Thomas GIII on Sep 18, 2012 Comments:
60.	Name: Rose Dobbs on Sep 19, 2012 Comments: Please add Facilo herring to the Stat of Alaska's Forage Fish Mangement Plan.
61,	Name: Maryann Dobba on Sep 19, 2012 Comments:



# Board of Fisheries 2012/2013 Proposal book



Proposal 95. I am against this proposal. It is unclear how this would affect someone who cleans AFISS and dumps the carcass in a water body. Would it then be considered chumming if that person or a member of his party continued to fish? If this proposal was limited to guides or persons utilizing a guide I would not be opposed.

Proposal 111. I am against this proposal. There appears to be no shortage of fish in the Eek River. There is no biological reason to eliminate sport fishing. The proposer may not participate in sport fishing, however, that is not a valid reason to deny that right to others.

Proposal 112. I am against this proposal. This proposal mixes two separate issues. Closing the river to sport fishing should only be done if biologically necessary. It is doubtful that the number of fish caught as a result of sport fishing is significant.

Proposal 113. I am against this proposal. The proposer is not opposed to sport fishing as long as the fish caught are kept and not released. The proposer implies that if all the fish caught by sport fishing are kept that this will cause salmon stocks to increase as opposed to catch and release fishing, this makes no sense.

Proposal 114. I am against this proposal. There appears to be a concerted effort to eliminate sport fishing in this region. However, fish belong to all residents of the state, and unless stocks are low there is no reason to eliminate sport fishing.

Proposal 215. I am for this proposal.

Proposal 224. I am against this proposal. Since the proposal states "one or more of the following means...", e-mail will become the only method used to announce emergency orders as it will be the easiest and least costly alternative. However, not everyone has access to a computer or smart phone, nor is there coverage throughout the state.

Proposal 228. I am for this proposal.

Proposal 233. I am against this proposal. The felt sole ban was enacted due to damage caused to stream beds and spawning habitat. Felt sole boots had not been in existence for long and seniors and handicapped individuals were able to fish before their introduction.

Proposal 235. I am against this proposal. This places an unnecessary burden on all fisherman in an attempt to catch those poaching fish. This proposal does nothing to stop that. If someone is willing to break the law when catching fish why would they fill out a form or provide truthful responses on that form? If poaching is a problem in an area individuals should request additional enforcement and provide information to authorities when appropriate.

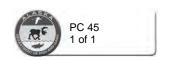
Proposal 242. I am against this proposal. This proposal is poorly conceived. It attempts to rectify a problem created solely by a fisherman who buys poor gear. Under this proposal those fisherman who purchased low quality gear will now have an advantage over those who bought quality gear. This is because not only will their nets be deeper but the mesh size will be smaller. When the nets shrink they will lose some depth but as the mesh size will be reduced they will catch more fish when compared to a net of the same depth that does not shrink. Mesh size will be the critical variable for catching fish as opposed to depth of net for the few extra feet added. Furthermore, nothing prevents a fisherman from replacing the nets that have shrunk with those of a higher quality. This is strictly a self inflicted



problem which the Board should not have to remedy. Additionally, increasing the depth of net for all fisherman will increase the number of fish caught before they can pass to other areas of the state.

Proposal 243. I am against this proposal. The proposer states that lead in the environment can cause injury to wildlife. Lead is a naturally occurring mineral, would he have the state remove all naturally occurring lead also? Lead sinkers do not remain on the surface of stream beds and beaches when lost, they sink into the stream bed and beach gravel out of the reach of waterfowl.

Submitted By Brian West 1000 OCEANVIEW DR BNCH DR 9955



01/01

Alaska Board of Fisheries Juneau, Alaska

11/9/2012

Dear Sirs,

I am offering comments regarding board proposal 229. The proposal has two provisions aimed at protecting king salmon returning to the Nushagak river.

I am in favor of the section of the proposal which requires the use of single point hooks. Since many of the sport caught kings are landed and released, it is imperative that they be unhooked and released in a timely manner. Single hooks make this much easier and quicker with minimal harm to the fish.

The second provision regarding no bait I am opposed to. In my experience guiding anglers on the river and releasing thousands of fish, I have seen very few that were hooked deeply using single hooks and bait. Of the very few that were bleeding, most were retained by the anglers.

The Nushagak-Mulchatna King Salmon Management Plan already allows ADFG to restrict the use of bait using an Emergency Order if deemed necessary. A total ban on bait use would adversely impact the catch rates of local and visiting sport anglers. Sport fishing in Alaska and on the Nushagak especially, has already been crippled by the current recession. Many camps on the river have been closed due to a lack of clients. This proposed no bait provision would be just another unnecessary nail in the coffin for the remaining businesses.

Thank you for your consideration of my comments.

Sincerely,

Ron Smith Sport Fishing Oregon 29356 Vera St. Gold Beach, Oregon 97444