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Submitted By

Aaron j Nevin

Submitted On

12/25/2016 5:07:11 PM

Affiliation

As a lifelong Kodiak seiner I oppose the proposed changes to the cape igvak management plan.



Submitted By
Abigail Turner
Submitted On
12/27/2016 9:44:23 AM
Affiliation

ATTN: BOF Comments Boards Support Section Alaska Department of Fish and Game

P.O. Box 115526 Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56, 57, 59, 62 & 63

Dear Chairman Jensen and Board Members:

Thank you for the opportunity to comment on proposed changes to the Cape Igvak Management Plan and the proposed changes to management of the Westside and Alitak Districts. I participated in the Kodiak purse seine fishery as a deckhand for 17 years. There are currently four active Kodiak seine permits in my family and although no longer on deck, I serve as shore support. My family provides employment to an average of 14 people annually and utilizes a variety of businesses and marine trades in Kodiak, Homer and around the state.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan. Therefore, I ask the Alaska Board of Fisheries not make changes to the existing plan by rejecting proposals 51-56.

Proposal 57 singles out purse seine gear as the primary cause of decreased catch and income in the Alitak District for those who fish set gillnets. The proposal is making a direct request for the reallocation of the salmon resource to one gear type for a significant portion of the salmon season in a large section of the district. I ask the Board of Fisheries to reject proposal 57.

Thank you also for the opportunity to express opposition to proposal 59. This proposal is based on the premise, "The burden of conservation of Alitak bound Sockeye is placed solely on the end user group (Alitak District)", as posited by Mr. Eric Dieters. Although the proposal mentions mixed stocks, the suggested weekly closures appear to be less focused on escapement and current management strategies for mixed salmon stocks on the Westside and south end of Kodiak, but rather a single-stock, Alitak-bound salmon focus. Without further explanation, this particular proposal could include mandatory closures from the Southwest Afognak District all the way to Alitak. The potential closure to commercial fishing in these areas would not only place an enormous strain on a large percentage of commercial harvesters, but could also negatively effect runs from Afognak to Alitak. All districts and gear types that harvest in Kodiak are governed by management plans executed by Alaska Department of Fish and Game professionals. All commercial salmon harvesters, set gillnet and purse seine operate under the direction of ADF&G for the purpose of conserving salmon stocks for future generations. The premise of this proposal is flawed, and the solution is reckless and could be detrimental to many Kodiak salmon runs.

Finally, proposals 62 & 63 are based on a non-factual premise that there is increased purse seine activity at the Ayakulik terminus. This is out of historical and factual context. Purse seines are only allowed to the terminus when ADF&G deems it is appropriate and responsible, providing for healthy healthy salmon stocks. The proposals suggest a concern that the commercial fleet is capturing Chinook salmon in Inner Ayakulik before they can escape up the river. From 2005 to 2015 the commercial fleet has only harvested 144 Chinook salmon in Inner Ayakulik, that is 144 Chinook in ten years, whereas the sport fishery has harvested 512 Chinook salmon and claimed to catch and release 7,295. Please reject proposals 62 & 63.

Thank you for your time and consideration,

Respectfully,

Abigail Turner



Submitted By
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Submitted On
12/27/2016 4:21:16 PM
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ATTN: BOF Comments

Board Support Section

Alaska Department of Fish and Game

PO Box 115526

Juneau, AK 99811-5526

RE: Opposition to proposals 51 through 56

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. I am a third generation commercial fisherman from both sides of my family, who grew up fishing on my dad's boat since I was five. Although I live in Homer I have never spent a summer on land, as I was on deck of my father's seiner fishing the waters of area K. We ended up in Alaska in 1980 moving from Oregon after the Judge Bolt decision drove my parents north, simply because they could not make a living doing the fisheries that both my mom and my dad and their parents did. After I graduated from high school I started fishing as a crewmember in Chignik because the crew shares out of Chignik were so much higher. My dad agreed to let me go where the money is. At a young age I knew that I wanted to run my own boat someday and started saving. My first investment needed to be a permit because a boat with no permit doesn't do me any good since permits are supposedly illegal to lease but boats are not. Chignik was my first choice but I could not afford a Chignik permit, so back to Kodiak I went. I have been running my own boat in Kodiak for 16 years and have a young family of my own that joins me.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established a Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

Then 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of the Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon earnings than Kodiak fishermen in addition to substantially higher permit values. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management plan. Therefore, I ask the Alaska Board of Fisheries not to make changes to this plan by rejecting proposals 51-56.

In regards to proposals 62-63 regarding closed waters around the Ayakulik river does not make sense, we used to have a corridor around the river mouth and we got it changed to the stream terminus because all the corridor did was reward the criminals by allowing them free reign with no state money to enforce the law. Guys that played by the law lost out and ground their teeth having to watch the cheaters go inside the line. Years ago it was changed so that if there was enough escapement and **only** if there is enough escapement a inner Ayakulik opener to the stream terminus would happen.

Proposal 65 changing the mesh size on a purse seine to 4 1/2 inches would be detrimental to the fishery as it could add a lot of by-catch. Turning our seines into a gillnet and making it way harder to return king salmon to the water unharmed. I think the reason the setnetters do not have to obey that law, is because they kill everything that swims into their nets; including sea mammals and sea birds.

As far as proposals 57-61 changing how the west side and Alitak districts are managed would not be beneficial because of how

unprotected these areas are. If setnetters start fishing in these areas there is going to be a lot more injuries and possibly deaths in the setnet fleet due to being in weather they should have never been in. As it closes they are going to have to pull their nets in storm warning or not, or their going to get a ticket. Furthermore the want and waste issue is going to be even more increast as they can't get to their nets to pick them because the weather and the fish that are already caught and dead fall out and end up on the bottom of the ocean. Those fish are simply wasted.



With all these proposed changes I often wonder what will be left for my kids, it's bad enough dealing with the changes in the climate, let alone changes within the district. I ask the Board to really consider that these changes proposed have a detrimental effect on all user groups if they considered the long term effects, and it's hard to please all. So on that note I would like the board to reject all of these proposals and keep everything the same.

Thank you for your consideration.

Respectfully,

Adam C Barker

F/V Windigo & F/V Allie B life long Kodiak Seiner



Submitted By
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Submitted On
12/27/2016 8:56:38 AM
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ATTN: BOF Comments Boards Support Section Alaska Department of Fish and Game

P.O. Box 115526 Juneau, AK 99811-5526 RE:

Opposition to Proposals 51 through 56 Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan.

As a Kodiak Seiner if these proposals were to pass I would lose access to a very important economic fishing location that I have fished for the last 10 years when open. Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens. The 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan. Therefore, I ask the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56. I also oppose proposition 57, 58, 59, 60, 62, 63, 64, and 65 due to the economic impact it would have on my fishing business.

Thank you for your consideration. Respectfully,

Alex Roth

Kodiak salmon seiner



Submitted By
Bill Prout
Submitted On
12/27/2016 10:18:24 AM
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To the State of Alaska Board of Fish

In favor of proposal RC 40

My name is Bill Prout and I am the owner and operator of the 116 foot Bering Sea crab vessel the F/V Silver Spray. I have over 40 years of commercial fishing experience throughout the Alaskan waters.

In the time that I have spent fishing, my crew and I have seen the fluidity of the industry as we have strived to harvest our catch sustainably.

In the most recent years of the crabbing season, quotas have been cut, yet, fishing has been as good as I have ever seen it. A sample size of one should not be used as the basis for changing the quota allotment, but when you have no small number of other harvesters saying the same thing, it no longer becomes a single point of information. It is a common consensus among harvesters that CPUE's have been relatively high for the majority of the fleet for the Baridi fishing season.

My crew and myself have come to depend on the revenue generated by Baridi fishing operations to provide for our families and sustain ourselves. With a closure of the 2016-2017 Baridi commercial season, the economic loss would not be considered insignificant, especially when compounded with financial implications of the decline in Opilio TAC.

Additionally, I believe the practice of discardment of Baridi bycatch boarders on Total mismanagement of a vital resource, especially when it is known to induce trauma and increase the mortality rate on the species being discarded. A small allowable Baridi catch should be implemented if only to avoid a total waste of a small, but valuable portion of the resource.

The fact that not even a reasonable allowable quota is in place to offset the guaranteed bycatch of the species shows what I believe is a gross mismanagement of the quota. There is approximately 9,000sq miles of area off the Pribilof islands that is closed and unfished and have historically produced very well, and should be considered when discussing the health of the fishery.

I believe it would be beneficial to implement a temporary allowable biomass catch to the Baridi crab season to work in accordance with negating the effects of the aforementioned issues that a total closure of the season would bring. A conservative TAC amount would not impose substantial risk to the healthiest Bering Sea crab stock.

I hope you take these comments into consideration,

-Bill Prout



December 27, 2016

Alaska Board of Fisheries,

I am writing this letter in support of the proposals 51-56 concerning the Cape Igvak Fisheries. I have been a life-long fisherman in the Chignik management area and a year round resident. I have seen a great decrease in the amount of Chignik bound sockeye returning and being harvested here in Chignik since the allocations were increased to benefit Kodiak due to hardships many years ago. Now the times have reversed and Chignik is suffering from financial hardships.

1. Twenty years ago my family and I would fish until the middle of September but due to amount of fish needed for escapement we are lucky to fish until the middle of August.
2. Chignik Fisherman sacrificed and worked hard to get their escapement built up only to have Igvak fisherman take a percentage of our fish. Sometimes our escapement goals are not even met before Igvak is opened.
3. The lack of harvest has cost the Chignik Fisherman a shore plant here in Chignik.
4. Igvak targets the peak run which makes the Chignik Fisherman scratch to try to make ends meet.
5. It is difficult to remain in Chignik year-round because the lack of fish also causes the City to have financial problems and unable to employ workers during the winter.
6. I am also constantly worried about enough children in the City for school. I shouldn't have to move so my children can get education.
7. Kodiak has many salmon stocks and systems were here in Chignik we have only one system to support the Fisherman.

The loss of some percentage of the Igvak fisheries would not be significant loss for Kodiak Fisherman where as it would be a benefit for the Chignik management area so there would not be so many financial hardships to the fisherman and the City residents.

Sincerely,

A handwritten signature in blue ink, appearing to read "Billy Anderson".

Billy Anderson

F/V Alaska Rose



Attn: BOF Comments
Boards Support Section
Alaska Dept. of Fish and Game
PO Box 115526
Juneau, AK 99811

Dec. 23, 2016

RE: Opposition to Proposals 51 through 56

Dear Chainman Jensen and Board Members,

Thank you for the opportunity to provide written comments on proposed changes to the Cape Igvak Management Plan. My name is Brad Marden and I am owner and operator of a Kodiak seine operation. I have been commercial fishing in Alaska since 2004 and I have been running my own seiner since 2012. My boat is based in Larsen Bay during the summers and in Homer during the winters. I take pride in hiring local deckhands, in employing local labor for boat improvements, and in purchasing from local marine vendors. In general, I support biologically-grounded management, and I prioritize biologically sustainability over allocation and efficiency arguments. I understand that the Board of Fish is continually tasked with making decisions that blend biological, social, and economic factors, but I feel it is important to identify that the primary objective with these proposed changes is allocative.

Proposals 51 through 56 are allocative in nature, and they seek to significantly alter one of the oldest fishery management plans in the state without reasonable justification. The proposals are a push from Chignik permit holders to deny Kodiak permit holders access to an area where Kodiak fishermen have had clear historical precedent since well before the advent of limited entry. Since 1978, Chignik seine boats have averaged over 37% more earnings than Kodiak seiners over a much shorter fishing season, and Chignik permits are consistently severalfold more valuable. There is simply no financial, managerial, or biological justification for Proposals 51 through 56.

Proposals 51, 55, and 56 attempt to make the case that Kodiak fishermen should cede fishing access around Cape Igvak because Chignik fishermen have suffered undue and disproportionate hardship. Average vessel gross and permit values directly refute this (see above), and Chignik permit holders reside in communities of all size- some live year-round in Chignik, but many also live on the road system, or in big cities, or out of state. Loss of economic opportunity in small Alaskan villages is a valid concern, but Chignik is not unique with this concern. Proposal 52 seeks to mandate the reporting of harvest and/or vessels in and out of Igvak, but we are already obliged to accurately report time and location of harvest on our fish tickets. The insinuation that Kodiak fishermen might travel across the Shelikof with intent to misrepresent a catch is unfounded, illogical, and insulting. Proposal 53 is an allocative plea veiled behind a thin veneer of insufficient biology concerning salmon run timing. It seeks to further restrict early season opportunities in the Cape Igvak region, but fails to provide a management plan for the Cape Igvak district post-July 9. It should be noted that while Cape Igvak is a traditional intercept fishery, many of the Chignik fishermen also benefit from opportunistic intercept of traveling (non-Chignik-bound) fish. There is strong historical precedent for intercept fishing from both Chignik and Kodiak fishermen throughout June and July, but this does not necessitate an overhaul of the Cape Igvak Management Plan. Proposal 54 seeks to exclude Cape Igvak harvests in the calculation of the 15%



Chignik-bound allocation granted to Kodiak fishermen, but this would be inconsistent with state biologists' initial good logic.

The average Kodiak fleet harvest since 1978 has been 12% of the Chignik area sockeye harvest. This is only 80% of the allocation, indicating effective management, if anything conservatively erring to the side of Chignik fishermen. I believe the long-standing Cape Igvak Management Plan, based on historical fishing practices for mainland sockeye, is biologically sustainable and is an equitable compromise between Chignik and Kodiak seiners, and should remain unchanged at this time.

Thank you for your service and for reading my comments.

Sincerely,

Brad Marden

Kodiak salmon seine permit holder and active fisherman



Submitted By
Bradley W Underwood
Submitted On
12/21/2016 3:42:22 PM
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commercial fisherman

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RC – Pertaining to Alitak Bay District: Permanent removal of Optimal Escapement Goal (OEG) as it pertains to early run Upper Station to be replaced with Biological Escapement Goal (BEG) with specific solutions to management concerns.

Actions to be taken –

5 AAC 18.361(j) will be amended to read:

The Dog Salmon Flats Section shall be managed, from June 1 through August 20, based on sockeye and pink salmon returns to the Frazer system. (AND, THE DOG SALMON FLATS SECTION WILL BE MANAGED FROM JUNE 1 THROUGH July 14, BASED ON SOCKEYE RETURNS TO THE EARLY UPPER STATION RUN.) From August 21 through the end of the fishing season, the Dog Salmon Flats Section shall be managed based on coho salmon returns to the Dog Salmon River and Horse Marine systems. The Dog Salmon Flats section may be opened to fishing only when the department determines that escapement goals will be exceeded (AT FRAZER LAKE OR WHEN ESCAPEMENT GOALS WILL NOT BE MET FOR UPPER STATION EARLY RUN.) These openings may not jeopardize achievement of minimum escapement goals for other salmon species. The Department shall give at least 24-hours advance notice before opening the Dog Salmon Flats Section.

5 AAC 18.361(a)(3) is amended to read:

(3) THE EARLY UPPER STATION SOCKEYE SALMON RUN IS TO BE MANAGED FOR MAZIMUM SUSTAINED YIELD (MSY) WITH A BIOLOGICAL ESCAPEMENT GOAL (BEG) RANGE OF 43,000 TO 93,000 SOCKEYE.

5 AAC 18.361(c) is amended to read:

FROM JUNE 1 THROUGH SEPTEMBER 15, THE COMMISSIONER SHALL OPEN AND CLOSE, BY EMERGENCY ORDER, FISHING PERIODS FOR THE CAPE ALITAK, ALITAK BAY, MOSER BAY, AND OLGA BAY SECTIONS AT THE SAME TIME, 12:00 NOON.



Submitted By
Brian McWethy
Submitted On
12/27/2016 12:21:59 AM
Affiliation
Lifelong seiner

My name is Brian McWethy. I have been seining in kodiak since I was in grade school, and I plan to continue seining for the remainder of my life. I am strongly opposed to the creation of a mandatory commercial marker at the ayakulik river mouth. All the kings are released to the ocean, which is very easy to do with a seine operation. So I don't see this amendment changing the number of kings returning to the river at all. The number of fish entering the river is also monitored very closely by fish and game and fish and game manages the areas opened accordingly. Closing this area permanently would reduce the ability of stopping over escaping which could harm the king stocks even more. Some years there are a lot of pink salmon and sockeye, which makes overescapment a real possibility. Aside from the fact that ayakulik river mouth is a traditional fishing grounds that has been fished for generations it is one of my favorite places to fish on the island. I don't believe this amendment would change the number of kings returning. Low king salmon return is state wide. All this does is limit the possibilities for the salmon seiner fleet to make a living.

As far as the lgvak proposals go the traditional regulations have been in place for many years and both fleets (chignon and kodiak) have had their ups and downs. I'm against changes to restricting the opportunities to the kodiak fleet. Which is much larger and had a very poor year this last year. Any amendment limits the chance for making a living off salmon seing which is what my family and I do. I hope to be able to fish all traditional fishing ground with another geration as I did with my father. This is a traditional fishery that family's have done for years it should stay that way.



Submitted By
Bryan Horn
Submitted On
12/27/2016 10:46:26 AM
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ATTN: BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

Dear Chairman Jensen and Board Members:

RE: Opposition to Proposals 51 through 56

I appreciate the opportunity to comment on proposed changes. I am Bryan Horn a third generation salmon seine fisherman in Kodiak. I have been running boats in Kodiak for 16 years; I have fished for salmon, herring, cod and tanner crab. My grandfather fished in the Cape Igvak section; in fact prior to area registration he fished Cook Inlet, Kodiak and Chignik. I believe his final trip to Igvak was in 1969. My father's first fishing trip to Igvak was 49 years ago. I have been fishing the Cape Igvak section my entire fishing career.

Chignik fishermen are claiming Kodiak has multiple fisheries in which fishermen can engage in. Chignik fishermen have all the same opportunity that I as a fishermen have living in Kodiak. They may not have a direct local herring fishery, but many have fished herring in the past including in Kodiak. With the current state of the herring market and biomass I have not fished Kodiak herring for 3 years and have not been to Togiak herring fishing in the same amount of time. At the time of these meeting both Chignik and Kodiak fishermen should be preparing for the upcoming tanner season; however this is the 4th consecutive year that we will not have a season due to low crab numbers. With both herring and tanners not being a current option for me, herring for economic reasons and tanners because of low numbers my opportunities have been instantly cut in half. This leaves me with Federal Parallel, (fishing inside 3 miles as I do not have a Ground fish LLP.), and State pot cod and salmon. For a vessel my size, (52'x17' fiberglass seiner) pot cod is a very low margin fishery. In addition to high gear, bait, and fuel prices, weather and the small size of my vessel severely restricts my ability to compete with the predominately larger pot cod boats during the Federal season. It is not a huge money maker for me and my crew. These are also opportunities available to Chignik fishermen; there are a number of Kodiak fishermen that fish cod in Chignik waters rather than Kodiak waters. There are also a number of Chignik salmon fishermen that have previously been Kodiak salmon fishermen. These fishermen who live in Kodiak and Homer etc., have chosen to fish away from home in Chignik waters. The majority of Chignik salmon fishermen do not reside in Chignik the entire year and do not participate in their other fishing opportunities. Over the years we have seen Chignik salmon seiners come fish in Kodiak for salmon, however they rarely last longer than a year before they are right back to Chignik the following season. If fishing Kodiak Salmon, (Cape Igvak Salmon Management) plan was so detrimental to Chignik salmon fishery why wouldn't salmon fishermen from Chignik continue to fish Kodiak?

Before limited entry Kodiak fishermen developed the Cape Igvak commercial salmon fishery as an important component to their fisheries. The Cape Igvak fishery continued to develop and expand when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area

salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan. Therefore, I ask the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 50 of 56.



RE: Opposition to proposal 59

Creating a 63 hour mandatory closure on the Westside of Kodiak would most certainly result in over escapement of the Karluk River. Over escapement is just as bad as under escapement and could potentially put future returns to the Karluk in danger.

RE: Opposition to proposals 62 and 63

The sport fishermen would like you to believe that the mouth of the Ayakulik River is open continuously all year long. This however is not the case! This past summer Outer Ayakulik was open for two (2) days only. Inner Ayakulik was open for zero (0) days through July 15. You can assume that there was nobody fishing the river mouth on days that Inner Ayakulik was not open, being that nobody got tickets for fishing illegally in the Ayakulik section. The entire state seems to be having an issue with King salmon returns not just the Ayakulik River. Kodiak salmon fishermen are already required to return King salmon greater than 28 inches to the sea unharmed.

RE: Opposition to Proposal 65

We are salmon seiners. Four and half inch mesh is gillnetting size mesh. Enlarging the legal mesh size would not only be a huge economic burden for salmon fishermen that just had the worst fishery on record, it would also transform our salmon seines into gigantic gillnets. A large set of humpies would be a complete disaster with part of the catch escaping through the larger mesh and the remainder of the catch would be gilled, forcing salmon seiners to become salmon gillnetters. This could cause an undetermined number of other problems, including but not limited to other seabirds and mammals becoming gilled and trapped in the bigger web, as well as the loss of catch and way more target species being gilled in the web.

Thank you for your consideration.

Respectfully,

Bryan Horn

Owner/Operator, Kodiak Salmon Seiner

F/V Jamboree



Submitted By
Charles Mcwethy
Submitted On
12/26/2016 6:11:53 PM
Affiliation

Phone
907 942 5543
Email
qmcwethy@gmail.com
Address
PO 8552
Kodiak, Alaska 99615

I have been a kodiak salmon seiner since 1986 and historically we only catch 15% of chignik fish an that is a fair and equitable amount. And for ayakhulik, when there is potential I just said that I'm a second generation kodiak salmon seiner and historically we only catch 15% of chignik fish an that is a fair and equitable amount. And for ayakhulik, when there is potential over escapement the best way to prevent it is to open it up to the river for salmon seining escapement the best way to prevent it is to open it up to the river for salmon seining



Submitted By
charlie johnson
Submitted On
12/27/2016 4:33:18 PM
Affiliation
kodiak siener

proposal 53 I oppose this because there are boats that do fish the later chignik lake run and depend on it yearly. If we are not allocated on the total run then we will not get fishing time to fish on the later run.

Submitted By
charlie johnson
Submitted On
12/27/2016 5:07:26 PM
Affiliation
kodiak siener

proposal 55 I oppose. The cape igvak section is an important part of the income for the boats that fish there. This year was also a great example of the how important cape igvak section is to kodiak sieners, the average kodiak siener made \$66,000 this summer. The exvessel values may be greater for kodiak but we also have about three times the boats fishing. I have relied on the cape igvak section for 25 to30 percent of my income for 20 years. please, no repeal.

Submitted By
charlie johnson
Submitted On
12/27/2016 5:28:52 PM
Affiliation
kodiak siener

proposal 51 I oppose. Just because chignik has not been the most profitable the last few years they had a huge year in 2013. The average was \$418,352 per boat! Just because the last few years were not that good does not mean we should change something that has been working for 38 years. Fishing has its ups and downs.

Submitted By
charlie johnson
Submitted On
12/27/2016 5:41:28 PM
Affiliation
kodiak siener

proposal 59 I oppose. The mandatory closure could cause over-escapement in the karluk river.

Submitted By
charlie johnson
Submitted On
12/27/2016 6:02:21 PM
Affiliation
kodiak siener

proposal 65 I oppose. The amount of juvenile salmon caught is vary minimal. It would be expensive for sieners to change there nets.

Submitted By
charlie johnson
Submitted On
12/27/2016 4:45:12 PM
Affiliation
kodiak siener

proposal 56 I oppose this. It is an important part of income for the boats that fish there. Kodiak has almost three times as many boats fishing as chignik and a bunch that are not being fished every year because it is not profitable for every permit to be fished.



Wallace W. Hinderer

P.O. 13

Chignik, Alaska 99564

Alaska Board of Fisheries Kodiak Finfish Meeting, January 10-13, 2017

December 25, 2016

Board members:

I am a member of the Chignik Alaska city council. I have been authorized to represent the city council at this meeting. I am here with this letter to bring your attention to the plight Chignik has gradually found itself in, due to allocation of fish away from Chignik. When the original allocation of fish from Chignik to Kodiak fishermen at Igvak was made, Chignik economy was robust and it seemed reasonable to effect that move. Presently things are no longer the same. Chignik is presently dying due to small amounts of fish that are entering the area eligible to be harvested. Low tax revenues along with low fish priced simply are not sufficient to allow Chignik to adequately render proper service to its residents. Kodiak now has a more robust economy than does Chignik. We at Chignik think it is appropriate to revisit the Igvak allocation and make changes to help Chignik.

The following are indicators of the condition of the city of Chignik.

1. We have had to drastically cut the wages we pay our employees. Most 40 hour weeks were cut by ten hours per week. Some positions were cut up to fifty percent.
 2. Our garbage truck has been in a state of repair for over six months.
 3. Our boat harbor moorage fees are in arrears.
 4. We have no V.P.S.O. Due in part to lack of funds.
 5. Processors have chosen not to establish any shore plants based on smaller returns of fish.
 6. Residents are leaving Chignik due to lack of viable work.
 7. Lack of residents will most likely close our school down next year, due to not enough students.
 8. Coastal Transportation has not published a service schedule for Chignik. Once again lack of fish to transport out of Chignik is driving this decision.
 9. Our only year around store plans to close next year. The owner has alerted the residents.
 10. Chignik does not have liquid funds enough to purchase fuel, without taking out a loan.
-

The above are indicators as to the state of our City. We, the residents of Chignik, hope that the reasoning that convinced the board of fish to allocate Chignik bound fish to Kodiak in 1978, will now look to the needs of Chignik and diminish the present Igvak allocation by an appropriate amount.

Sincerely,

Wallace W. Hinderer (Chignik City Counsel)



Submitted By
Christopher Johnson
Submitted On
12/27/2016 12:41:50 AM
Affiliation

ATTN: BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56, 59, 62, 63, and 65

Dear Chairman Jensen and Board Members:

My name is Christopher Johnson and I appreciate the opportunity to comment on these proposals before the Board at the Kodiak finfish meeting. I was born in Kodiak to a fishing family and spent summers on and off my father's salmon boat. I started my career in 2005 as a deckhand fishing for salmon, halibut, Tanners, and cod out of Kodiak. I bought my first boat in 2011, which was a 25-foot jig boat that I worked in the winter and spring months while still crewing for the summer salmon season. I bought into the Kodiak salmon seine fishery in 2013 with a 38-foot vessel and I have participated ever since.

Opposition to proposals 51 through 56:

My personal experience is that diversified fisheries in terms of species/gear and harvest locations are crucial for successful fishing careers, particularly so for young and new entrants in the industry. I understand that well before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The Chignik biological escapement goals have been largely met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological considerations. Chignik fishermen continue to enjoy larger average salmon fishing earnings during shorter seasons compared to Kodiak fishermen, in addition to substantially higher average permit values. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik salmon permit holders. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. I see no biological, economic or regulatory changes in circumstances that would justify the proposed changes to the Cape Igvak Management Plan. Therefore, I ask you not to pass proposals 51, 53, 54, 55, and 56.

Opposition to proposal 59:

This proposal requests a 63-hour closure every week in the Westside and Alitak sections for the conservation of Alitak bound sockeye salmon. I believe that such a mandatory closure would risk over escaping Karluk and Westside natural runs and in my opinion potentially damaging these runs is unacceptable. I ask you not to pass proposal 59.

Opposition to proposals 62 and 63:

Proposal 63 states that there is increased commercial fishing effort at the Ayakulik terminus that prevents Chinook salmon from entering the river, though I do not agree that this statement is factual. From 2005 to 2015 the commercial fleet has only harvested 144 Chinook salmon in Inner Ayakulik, whereas the sport fishery has harvested 512 Chinook salmon and claimed to catch and release 7,295. As commercial fishermen are required to return Chinooks over 28 inches to the water, large fish are already not retained by seine gear. These proposals would also make enforcement logistics difficult, as it would be hard to define a 500 or 1,000-yard radius from the river mouth. As is, when commercial fishing is open to the terminus it allows for better management through pulse-fishing techniques as it permits for hitting escapement goals through conservative in-season management and optimal fishing time for harvesters. I ask you not to pass proposals 62 and 63.

Opposition to proposal 65:

I disagree with this proposal's underlying thesis that the commercial seine fleet catches large amounts of juvenile Chinook and chum salmon. Furthermore, I argue that the requirement for fishermen to obtain and utilize a new seine is inappropriate and cumbersome. The proposed 4.5-inch mesh size would require commercial fishermen to purchase an additional net for just a portion of the season and would cost thousands of dollars. Furthermore, this proposal would create another incredibly daunting barrier for those seeking to enter the fishery and for those who are just beginning their Kodiak seining careers and I urge you not to pass proposal 65.



Thank you for giving my comments your time and consideration.

Respectfully,

Christopher Johnson

Owner-operator, F/V North Star



**CITY OF OUZINKIE
Resolution 2016-10**

**A RESOLUTION SUPPORTING THE ESTABLISHMENT OF A LIMITED DURATION
SUBSISTENCE SALMON HARVEST AREA IN OUZINKIE HARBOR**

Whereas, Ouzinkie is a small Alutiiq village that continues to prioritize subsistence harvests and the subsistence way of life; and

Whereas, the Ouzinkie Native Corporation has cooperated with the Kodiak Regional Aquaculture Association by providing access to the water source for the Kitoi Bay Hatchery; and

Whereas, the Kodiak Regional Aquaculture Association in conjunction with the community of Ouzinkie developed a sockeye imprinting project in Ouzinkie harbor so that sockeye salmon return to the harbor for subsistence harvest; and

Whereas, the community of Ouzinkie has supported the project by purchasing the rearing pens and feeding the sockeye salmon fry during the imprinting process; and

Whereas, the first sockeye salmon returned to the Ouzinkie harbor in 2015 and the community of Ouzinkie greatly enjoyed and utilized the subsistence harvest of sockeye salmon in proximity to the community; and

Whereas, during the 2016 return of sockeye to Ouzinkie harbor, a commercial seine vessel entered the area and "scooped up" the sockeye intended for Ouzinkie subsistence use right in front of the nets set for catching subsistence fish; and

Whereas, Kodiak purse seine vessels have not historically fished in the Ouzinkie harbor and there is ample opportunity for commercial salmon fishermen to catch sockeye returning to Ouzinkie as "common property" fish prior to the fish reaching Ouzinkie harbor; and

Whereas, a limited duration exclusive subsistence fishery in the Ouzinkie harbor would provide for the subsistence needs of Ouzinkie residents and other subsistence fishermen.

Therefore be it resolved, that the City of Ouzinkie respectfully requests that the Alaska Board of Fisheries establish an exclusive subsistence fishery in the Ouzinkie Harbor area from July 1 through August 15 of each year.

ADOPTED by duly constituted quorum of the City Council of Ouzinkie, Alaska, this 27th day of December, 2016.

ATTEST:

Linda Getz
Linda Getz, Clerk Emeritus

Signed:

Dan Clarion
Dan Clarion, Mayor



Submitted By
Daniel miller
Submitted On
12/24/2016 4:05:50 PM
Affiliation
Kodiak salmon Seine permit holder

Phone
907544621
Email
fvannad@gmail.com
Address
3214 spruce cape Rd.
Kodiak, Alaska 99615

This proposal would require me and other Seine permit holders to build another net costing up to \$40,000 or more in a fishery that's barely surviving economically

No proof that more king salmon would survive a larger mesh size

Sixty percent of Pollock trawling goes unobserved. This allows cherry picking of king salmon bycatch. This could be up to 100 times or more of Seine bycatch. We just don't know.



Submitted By
Danielle Ringer
Submitted On
12/27/2016 12:29:47 AM
Affiliation

ATTN: BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56, 59, 62, 63, and 65

Dear Chairman Jensen and Board Members:

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board at the Kodiak finfish meeting. I live in Kodiak with my husband who owns and operates a fishing vessel and we chiefly rely on salmon seining to afford to live in this community. Additionally, I just graduated from UAF with my Master's degree studying the graying of the fleet in the Kodiak region contextualized by local fisheries access and community sustainability.

Opposition to proposals 51 through 56:

My academic and personal experience has shown that diversified fisheries in terms of species/gear and harvest locations are crucial for successful fishing careers, particularly so for young and new entrants in the industry. I understand that well before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The Chignik biological escapement goals have been largely met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological considerations. Chignik fishermen continue to enjoy larger average salmon fishing earnings during shorter seasons compared to Kodiak fishermen, in addition to substantially higher average permit values. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik salmon permit holders. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. I see no biological, economic or regulatory changes in circumstances that would justify the proposed changes to the Cape Igvak Management Plan. Therefore, I ask you not to pass proposals 51, 53, 54, 55, and 56.

Opposition to proposal 59:

This proposal requests a 63-hour closure every week in the Westside and Alitak sections for the conservation of Alitak bound sockeye salmon. I believe that such a mandatory closure would risk over escaping Karluk and Westside natural runs and in my opinion potentially damaging these runs is unacceptable. I ask you not to pass proposal 59.

Opposition to proposals 62 and 63:

Proposal 63 states that there is increased commercial fishing effort at the Ayakulik terminus that prevents Chinook salmon from entering the river, though I do not agree that this statement is factual. From 2005 to 2015 the commercial fleet has only harvested 144 Chinook salmon in Inner Ayakulik, whereas the sport fishery has harvested 512 Chinook salmon and claimed to catch and release 7,295. As commercial fishermen are required to return Chinooks over 28 inches to the water, large fish are already not retained by seine gear. These proposals would also make enforcement logistics difficult, as it would be hard to define a 500 or 1,000-yard radius from the river mouth. As is, when commercial fishing is open to the terminus it allows for better management through pulse-fishing techniques as it permits for hitting escapement goals through conservative in-season management and optimal fishing time for harvesters. I ask you not to pass proposals 62 and 63.

Opposition to proposal 65:

I disagree with this proposal's underlying thesis that the commercial seine fleet catches large amounts of juvenile Chinook and chum salmon. Furthermore, I argue that the requirement for fishermen to obtain and utilize a new seine is inappropriate and cumbersome. The proposed 4.5-inch mesh size would require commercial fishermen to purchase an additional net for just a portion of the season and would cost thousands of dollars. Furthermore, this proposal would create another incredibly daunting barrier for those seeking to enter the fishery and for those who are just beginning their Kodiak seining careers and I urge you not to pass proposal 65.

Thank you for your consideration of these comments and for your time spent in our fishing community of Kodiak.



PC17
2 of 2

Respectfully,

Danielle Ringer, M.A.

F/V North Star



2017 Board of Fish, Kodiak Finfish

Comments submitted by:

Darren Platt

F/V Agnes Sabine

10708 Birch Cir, Kodiak

Opposed to Proposals 51 and 53-56

I am opposed to the proposed changes to the Cape Igvak salmon management plan. I have consistently participated in the Cape Igvak fishery since buying a boat in 2010, and my harvests in this area have been critical to the profitability of my business. In 2016, my individual harvest in this area was small, but ultimately provided enough income to make the difference between a profit and loss for the season. I know that many other fishermen in the Kodiak Management Area share similar experiences, as many of us rely on our sockeye harvests to keep our businesses afloat. There are no biological or socioeconomic arguments to favor the proposed the re-allocation. Chignik escapement goals have been met every year that there was a Cape Igvak salmon fishery and conservative management has kept Kodiak Seiners consistently below their 15% allocation, with a historical average of 12%. It would appear that the Chignik seiners simply want more fish at the expense of the Kodiak fleet which already operates on lower ex-vessel income and higher costs. I am concerned that a handful of individuals in the Chignik fleet have strategized to submit an abundance of proposals (this has been done repeatedly during the Kodiak cycles) in order to cast a wide net in the speculative hope that they may capture the approval of one of their re-allocative plans. Their repeated efforts come at no cost to themselves, only the lost time and effort of the Board of Fish and of the Kodiak fleet who must repeatedly defend their historical dependency on this fishery. These efforts are without basis and serve as a distraction from the real management issues facing the Kodiak Management Area (KMA).

Effects to Outlying Communities

Arguments in favor of the proposed changes to the Cape Igvak management plan incorrectly associate only the town of Kodiak with the KMA fishery, contrasting economic opportunities within the city of Kodiak with the lack of alternative employment options in the village of Chignik. However, the Kodiak Archipelago is home to the villages of Old Harbor (Population 224), Port Lions (197), Ouzinkie(163), Akhiok(72), Larsen Bay(89), and Karluk(37), along with remote settlements in Afognak



Bay, Uganik Bay, Raspberry Straights, and Ugak Bay. Most of these remote villages (perhaps with exception of Karluk) have a generational dependence on the commercial salmon fisheries, and have experienced substantial outmigration of fishing permits and vessels, due in large part to the decline of the profitability of the salmon fishery in Kodiak. Some villages are under threat of losing their commercial fishing fleet altogether and should not be overlooked when making management decisions in the KMA. For example, Ouzinkie has been reduced to two active fishing vessels, both commercial salmon seiners, from a historical peak of 40 vessels. These villages have virtually no year-round employment opportunities and would be negatively impacted by the proposed re-allocations.

Parallel Salmon Fisheries

The Board should consider not only how shifting harvest from Kodiak Seinners will directly affect the seine fleet, but how the Cape Igvak management plan impacts the approximately 150 setnet permits being actively fished in the KMA. Kodiak's largest wild and enhanced sockeye runs are located on the west side of the island where the set gillnets are largely concentrated. It should be expected that the seine fleet will shift its effort to focus more heavily on this area along with the Alitak area which will likely negatively impact those setnet fisheries.

Lack of Restrictions on Chignik's Fleet Harvesting KMA Bound Fish

While much attention is focused on the harvest of Chignik bound fish in the KMA, there is currently no notice taken of KMA bound salmon harvested in the Chignik Management Area (CMA). Over the decades, Kodiak fishermen have abided by restrictions of their harvests through the Cape Igvak management plan, meanwhile, Chignik fishermen are allowed to operate in the CMA unencumbered by any regulatory protocol to protect Kodiak salmon stocks. It would be naive as to view Chignik as a single-stock fishery, and fishing activity in this area most certainly negatively affects the biological and economic sustainability Kodiak's salmon fisheries on the peninsula as well Kodiak's west side fisheries at Karluk and Ayakulik. Fishing patterns in the KMA have remained largely unchanged since the last amendment to the Cape Igvak management plan. Cape Igvak harvest rates average about 20% below Kodiak's 15% allotment. Meanwhile, Chignik's fleet has seen a proliferation of cape seining effort in areas other than the lagoon, Chignik Bay and Central sections. Decades ago, when the Cape Igvak management plan was initiated, Chignik seiners focused primarily on the lagoon and nearby fishing areas, with the fishermen largely forsaking opportunities to harvest mixed stocks in outlying districts. This is no longer the case as larger vessels are producing increased effort in the Eastern, Western, and Perryville districts where they are able to heavily target Kodiak and Cook Inlet bound fish.

Consideration of catch composition in the Chignik area reveals substantial discrepancies between the size of sockeye caught in the central sections (those in the immediate vicinity of the Chignik lagoon) and the outside districts. The chart below shows the percent difference in individual sockeye weight between fish caught in the Chignik Bay, and those caught in the Eastern, Western and Perryville

sections. KMA bound fish, including Karluk, Ayakulik, Alitak, and Saltery, and Litnik sockeye are, on average, substantially smaller than Chignik bound fish. The Chignik fleet fishing in the outside districts catch fish that are 4% smaller than Chignik fish, with some years' outside sockeye averaging up to 14% smaller, indicating a high likelihood of smaller KMA bound fish being harvested in these areas. The graph below, produced with data obtained from ADF&G, illustrates these difference in catch composition between the central and outlying districts in the CMA.

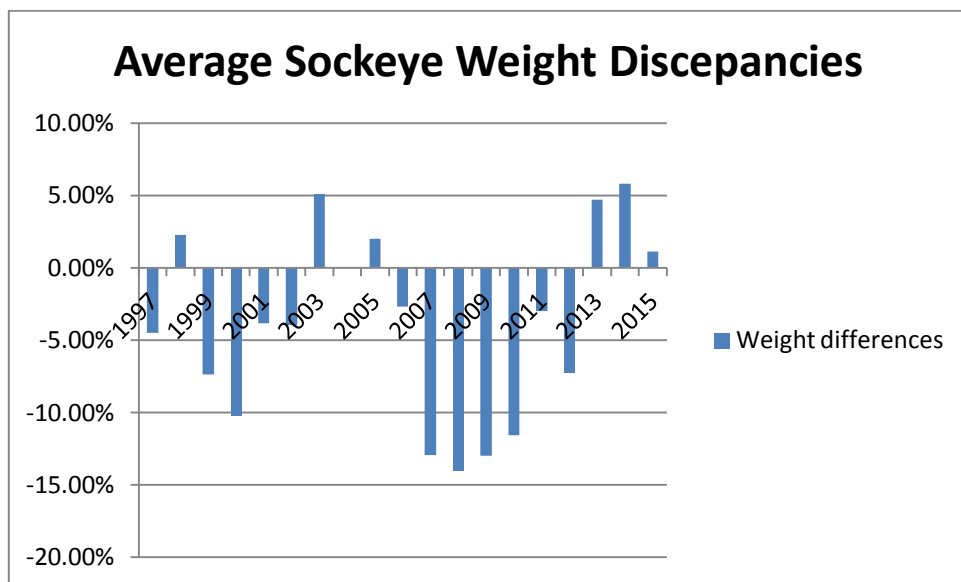


Figure 1: Weight differences between sockeye caught in central sections and the Eastern, Western and Perryville sections of the Chignik management area.

In fact, anecdotal evidence suggests that it is not uncommon for Chignik seiners to harvest large quantities of fish that they can identify as Karluk river sockeye. While the Kodiak fleet is limited in its Igvak harvest based on biological and allocative criteria, Chignik fishermen have operated unfettered by parallel regulations to protect Kodiak's salmon runs and fishermen.

Changes in fishing patterns in the Chignik area also likely have contributed to the decline of pink and chum salmon returns to the Mainland district. Once a mainstay of the Kodiak fleet, the mainland district now provides far fewer fishing opportunities. Escapement of pink salmon and chum over the past 10 years are down over 50% over prior escapement levels. Though, like all salmon systems, the causes of the decline cannot be pinpointed, the harvest of fish to these systems can only be hurt by Chignik's fishing activity in the outside districts. Areas such as Kukak Bay, which once provided continuous fishing opportunities for dozens of seiners now rarely produces any deliveries from Kodiak boats due to drastic chum declines.

It would be highly inequitable to further limit the Kodiak fleet's access to Cape Igvak area when the only noticeable change in fishing patterns since the implementation of the program is the increased



harvest of KMA bound fish in the Chignik area. With that in mind, it would be more justifiable for the board to *increase* Kodiak's allocation at Cape Igvak, rather than further restrict it.

Loss of Total Ex-vessel Value and Risk of Over-Escapement

Though Kodiak seiners earn lower gross incomes than Chignik fishermen and operate on substantially lower profit margins, seiners in the KMA enjoy a higher ex-vessel price for their fish. Kodiak is home to 7 major processors who provide tender service within the KMA along with a handful of smaller fish buyers who accept deliveries at the dock. The competitive market for fish and the ability of the processors in Kodiak to produce a higher value product means that the ex-vessel prices in the KMA are consistently higher than in Chignik. Without a single local processor, Chignik relies on remote processing of their fish by a just 2-3 potential buyers. As a result, the yearly ex-vessel price average for sockeye harvested in the KMA is 31 cents (30%) higher in Kodiak than Chignik, meaning that a re-allocation would necessarily result in a net loss of ex-vessel income paid in the state, representing an overall decline in the value of the fish harvested. In short, though Kodiak Seinners' average boat earnings are below those of Chignik fishermen, Kodiak fishermen are able to get a better value for the few sockeye they are able to harvest.

The lack of processing capacity in Chignik doesn't just translate into lower values for the fish, it also makes the system susceptible to over-escapement when then the 2 or 3 buyers aren't able or willing to accept deliveries from Chignik fishermen. This happened most recently in 2015 when both Chignik buyers quit accepting fish well before the run was over. As a result the Chignik river suffered from over-escapement of sockeye which could lead to future diminished returns, potentially costing them more than the perceived losses associated with Kodiak's access to the Cape Igvak area. Maintaining the current Cape Igvak management plan or possibly even *increasing* Kodiak's allocation in that plan would not only guarantee a higher value for the fish, but also provide an effective tool for managers to help prevent over-escapement of sockeye in the Chignik River, insuring a higher sustained returns.

Re-allocation from Ailing Fleet to Healthy One

The decline of Kodiak's salmon fleet is apparent when considering the loss of active vessels and the depressed market for Kodiak Seine permits. The graph below plots the gross numbers of latent (unfished) permits in the Kodiak and Chignik areas. Once home to over 370 active permits, Kodiak now has a participation rates hovering around 45%. Meanwhile, the Chignik area has consistent participation rates of over 75% and permit values that frequently exceed \$200,000, signaling an economically healthy fleet. Chignik frequently enjoy ex-vessel earnings above their Kodiak counterparts, and they are able to earn their income in a shorter season with far fewer deliveries, allowing them to derive an even

greater profit margin from those earnings. The economic difficulties facing the Kodiak fleet is reflected in the permit values that are the lowest for any major salmon seine fishery in the state. However, these low prices also provide a real opportunity for new entrants to the fishery who otherwise cannot afford to purchase a Chignik permit, or any other within the state, for that matter. Kodiak's seine fishery has developed into the ad-hoc entry fishery for young Alaskans who cannot overcome the economic hurdles required to access other salmon fisheries. It would be a disservice to the ambitions of future Alaskan fishermen to further reduce the profitability of the only major fishery that they currently can afford to access.

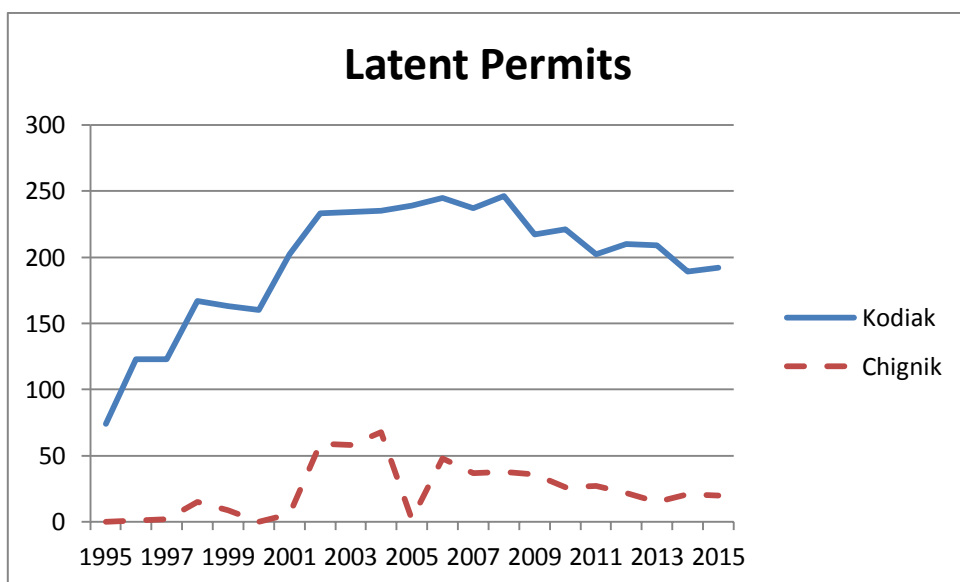


Figure 2: Unfished permits in Kodiak and Chignik areas

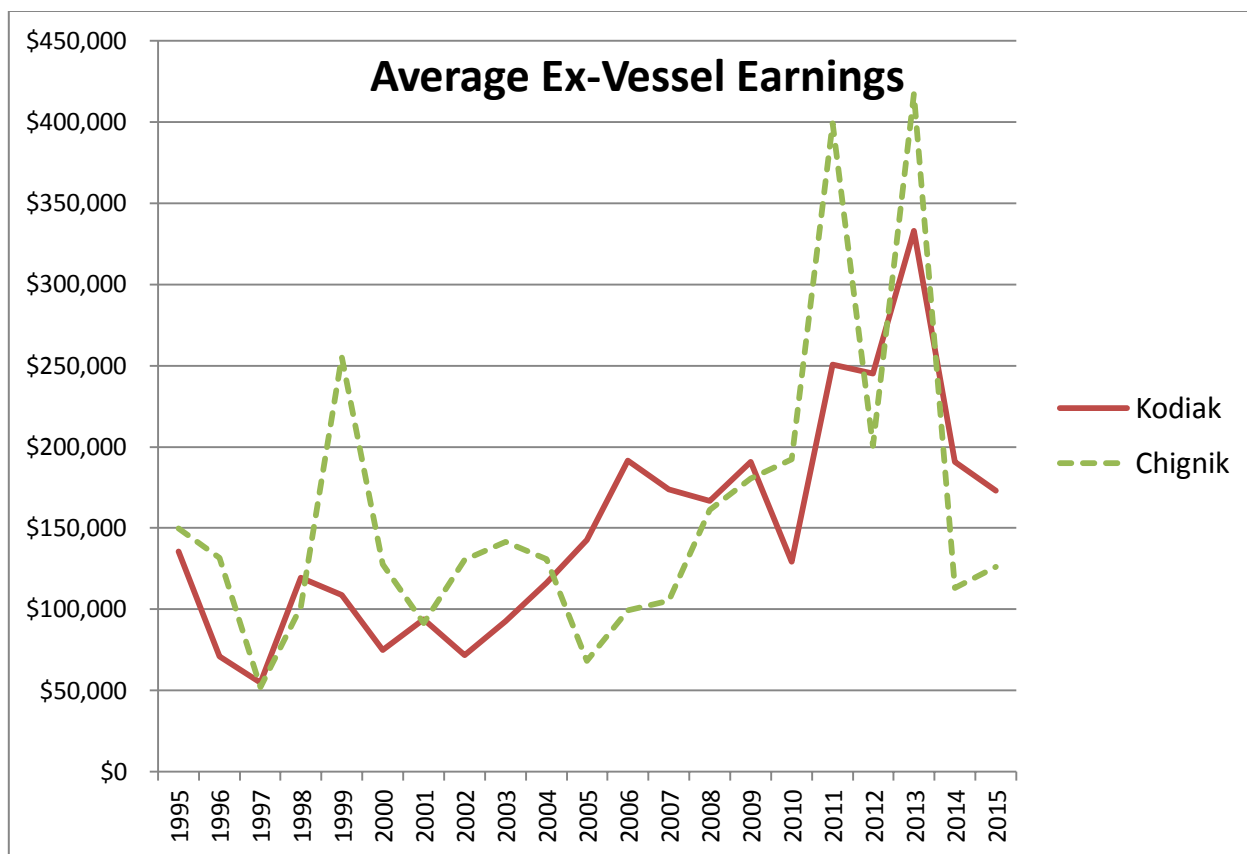


Figure 3: Average Ex-Vessel Earnings in the Chignik and Kodiak Areas

A re-allocation to the Chignik fleet is not only unjustifiable based on socioeconomic or biological metrics, it would likely result in a net decline in active fishing vessels in Alaska. Reducing Kodiak's harvest would inevitably result in further diminishing the Kodiak fleet. Chignik's high permit prices and participation rates make it very unlikely that the CMA would simply absorb the loss of boats in Kodiak. This translates into a net loss of active fishing vessels in the State. As Alaska struggles to solve our "graying of the fleet" problem, it is clear the starting point for maintaining the generational health of Alaska's fishermen is to insure that management decisions don't further restrict the accessibility and profitability of the salmon fisheries. Again, with these considerations, it would be better for the Board to *increase* Kodiak's allocation in a effort to grow our commercial fishing fleet and provide more opportunities for young Alaskan fishermen to establish their own harvesting businesses.

Shoreside Support Sector

One oft-neglected contingent is Kodiak's shoreside support sector. Kodiak is a highly fishery dependent town, as documented by the recent economic report composed by the McDowell Group. The



disastrous salmon harvest of 2016 has had economic repercussions that go far beyond the Kodiak seine fleet, as the myriad of shoreside support businesses are experiencing an economic contraction resulting from a lack of salmon income to the city. These businesses, which have already been hurt by the decline of over 200 vessels from Kodiak's salmon fleet would certainly be further harmed by the proposed re-allocation.

Considering the arguments I've made, I would implore the Board to oppose the proposed changes to the Cape Igvak management plan and to consider generating a proposal to increase Kodiak's allocation within the Cape Igvak section.

Opposition to Proposal 52

This proposal is as ludicrous as it is insulting. Virtually all of the fish caught in the Cape Igvak area are delivered in that area, and I have never even heard of a fisherman illegally misreporting these fish, as the proposal indicates. Processors always require that we deliver before departing Cape Igvak, just as they require us to deliver before we head there as well. Additionally, fishermen typically prefer to deliver before leaving the area otherwise they are forced to arrange tender service at their destination. It is far easier and more cost effective to deliver to the tender that is already available in the Cape Igvak area.

The proposal makes the bogus claim that there is a strong economic incentive for Kodiak seiners to misreport their catch. Although the Kodiak fleet's effort in the Cape Igvak area is limited to their allocation, an individual's own misreported harvest would not somehow be allocated back to that particular boat, but instead would be available to entire Kodiak fleet of 160 boats. Even if the skipper expects for there to be further harvest opportunities as result of his misreporting efforts, that fishermen could only expect to catch a small fraction of additional fish resulting from his contribution, since the Cape Igvak management plan is a fleet-wide allocation. This means that the fisherman would be paying to refrigerate the fish all the way to his destination where he would have to arrange tender service within a day, likely risking losing other fishing opportunities while delivering and traveling to the arranged delivery area. This would ultimately cost the fisherman more than the value of the miniscule fraction of the misreported fish that he could reasonably expect to harvest in the event of a subsequent fishing opportunity in the Cape Igvak section. All of the fisherman's risk and effort would be rewarded to the rest of fleet who would receive the allocation (again in the event of a subsequent opening in the Cape Igvak area), making these purported efforts more an act of generosity than self-interest.

This issue demonstrates the lack of respect for Kodiak fishermen and the Board of Fish shown by the small group of Chignik seiners who generated the whole suite of Cape Igvak proposals. Not only does the alleged economic incentive to misreport not exist, or even hold up to a few moments of objective



analysis, but their willingness to falsely accuse Kodiak fishermen of systematic dishonesty and illegal fishing behavior is reprehensible. Perhaps instead of issuing an insult in the form of a ridiculous proposal, this can group can further waste the Board's time by issuing an apology proposal during the next Kodiak cycle.

Support Proposal 57

I am in support of Proposal 57.

Opposed to Proposal 58

It would be poor policy to initiate the sort of bio-engineering that is being advocated for in this proposal. The cause of the decline of the Frazer system is unknown and it does not seem likely that further eliminating spawning fish would expedite a rebound of that system.

Opposed to Proposal 59

This proposal is arbitrary, un-necessary, and would more likely harm the commercial salmon fishery than help it. Salmon management needs to be escapement based, and any mandates that supersede escapement based policy should not substantially hinder the ability of managers to control escapement.

Opposed to Proposal 60

Please do not support this proposal which is unnecessary and would set a poor precedent of allocating wild fish to private institutions.

Opposed to Proposals 62 and 63

The decline of king salmon returning to the Ayakulik river is reflective of a region-wide trend including not just Kodiak's local systems such as Ayakulik and Karluk, but stretching all the way to Cook Inlet. The perception that fishing activity at the river mouth is the particular cause of Ayakulik's decline is without merit. With the exception of 2014, when there was over a week of seine fishing at the Ayakulik river mouth, there has been relatively few fishing opportunities in this area during peak of the King Salmon return. The fishing opportunities that did occur have been very limited in duration, which is the goal of local fishery managers. The King salmon scarcity commenced during a period following very low fishing activity at the Ayakulik river mouth. Additionally, there is no evidence to support the belief that King salmon returns would be increased by allowing for longer fishing times slightly further from the river mouth than short openings at the mouth. The Ayakulik river is currently on a very positive sockeye trend and it would be irresponsible to de-rail current management practices that have produced a



decade of controlled escapement within the management goals. The board should consider the fact that openings in the inner Ayakulik area are limited to years when high returns bring a threat of over-escapement.

These two proposals are more likely to harm King Salmon returns. By not allowing the Kodiak fleet to efficiently harvest large schools of fish directly at the river mouth, sockeye harvest rates would decline requiring longer openings in the inner Ayakulik area and more overall effort to control escapement. More nets fishing longer periods in the vicinity would likely increase the number of king salmon caught and the mortality of those fish that are caught multiple times, thereby decreasing overall escapement of King Salmon. The frustration of the handful of lodge-owners on the river and those clients whose visits inopportunistically coincide with an inner Ayakulik fishery is understandable, however, their sentiments are not a justification to change management tactics. Overall King and Sockeye salmon goals should be prioritized instead of attempting to maximize the satisfaction rate of a few in-river fishermen who are more focused on their personal fishing experience than the overall health of the rivers they utilize.

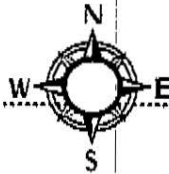
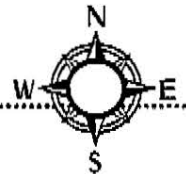
Finally, as many others will mention, enforcement in this area is nearly impossible. Past experience dictates that most fishermen will be unaware of the exact location of the river mouth and its 500 yard radius - with the most ignorant fishermen receiving the greatest rewards.

Support of Proposal 64

This small, enhanced return of sockeye to Ouzinkie harbor was designed to provide subsistence and sport fishing opportunities to Ouzinkie residents, and it clearly has more value to these residents than to the commercial seine fleet. The village of Ouzinkie lies on one of the most frequently transited navigational passages by Kodiak seine vessels, making it far too easy for a single vessel to harvest a large portion of these fish while simply passing through the area, though it is not a traditional spot for seining activity. Therefore, it would be best to protect these from commercial fishing efforts by creating the permanent closed waters area described in the proposal.

Oppose Proposal 65

I would hope that the board would not consider an arbitrary change to seine specifications that would have unknown ecological consequences and certain massive financial costs to the seine fleet.

PC19
1 of 1**CAPTAIN DAVID HARRIS**
U.S.C.G. LIC. #9409032807 S. Lk. Roesiger Rd.
Snohomish, WA. 98290
425-330-0901
davidharris47@msn.com

To: Alaska Board of Fish

Re; Proposal R.C. 40

As your surveys saw an increase of Western Tanner Crab by 13% in 2015 and given my observations fishing them, I don't see a problem harvesting a T.A.C. last year (01/2016) we were observing about 50% just undersized crab. Along with pockets of females up by St. George Blue Crab savings area, while trying to stay away from Trawlers as they towed inside of The Fence.

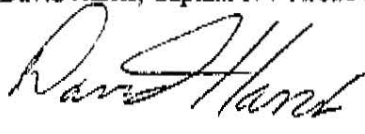
If we are not able to harvest any Western Tanner Crab this upcoming season our vessels and crew will suffer financial hardships on top of the decreased Opilio T.A.C.

One of my main concerns is the Trawl Survey practices, The net used is old technology compared to the vessels towing it. These two variables have to be matched and they are not, It is evident to see with the abundance of BBRKC catches this year, the T.A.C. of Western Tanners and we have yet to find out about Opilio's, should be interesting.

In closing, I am in favor of R.C. 40

Sincerely, David Harris, Captain F/V Arctic Mariner

Signature

 12/16/16



Board Support Section
Headquarters Office
Attn: BOF Office
P.O. Box 115526
Juneau, AK. 99811-5526

FAX: 1-907-465-6094

FROM

Donald L. Bumpus
F/V Kimberly Dawn

P.O. Box 167
Chignik Lagoon, AK. 99565
Home Phone 1-907-8402273
Cell Phone 1-907-840-4020

Kodiak Finfish Meeting



Dec. 20, 2016

Don Bumnpus
PO Box 167
Chignik Lagoon, AK 99565

Board Support Section
Headquarters Office
Attn. BOF Office
P.O. Box 115526
Juneau, AK. 99811-5526

Subject: Chignik Salmon Management

BOF Members

As a full- time Chignik residence that has commercially salmon fished in this area for 42 years I am highly concerned with direction that the Department has taken with respect to the management of Chignik-bound sockeye salmon especially in the last 2 years. To me it certainly appears that the fisheries supervisor in Kodiak has done everything possible to go against us Chignik fishermen and our villages. The Cape Igvak and in the Southeastern District Mainland are being managed at times too aggressively outside the intent of those management plans. The Dolgoi area is another fishery where Chignik concerns have had less than fair treatment. If this kind of management is going to be the trend we here in Chignik who call this place home will be looking at hard times. [REDACTED]

[illegible]



Allocation issues and knee-jerk management decisions associated with allocation fisheries on Chignik fish have become too common in my view. In 2015 the Western and Perryville districts were closed entirely due to what was so called "low escapement of pinks and chums" only to have it open 2 days later because SEDM was over allocated. Chignik played catch up for the rest of the season. This season Igvak opened 2 days after Chignik opened in early June. Our catch was only about 8 thousand. The 300,000 & 600,000 'guaranteed' harvest by Chignik fishermen was put into place for economic reasons. That number is there so we can feed our families. Please understand that those numbers do not provide for a healthy economy but only try to put a limit to how disastrous things can get for us in Chignik. Also, the 15% allocation for Kodiak at Cape Igvak is not a guarantee for Kodiak fishermen. But it seems as though management is making it one.

For most of the fisherman here, salmon is their only source of income. We don't have a year around processor or alternative jobs to fall back on like Kodiak and Sand Point.

That brings up Dolgoi Island. In the first place, the department managed for the 191,000 much too loosely going over the cap by 20%. They can and should do much better in the future. But even more to the point for Chignik is that the way that fishery is going they will reach 400,000 by season end which is contrary to the clear intent of the Board to curtail this interception fishery which has a negative impact on Chignik fishermen.

Rules and regulation are set into place by the Board of Fisheries for real reasons. A manager that relies too heavily on how things have always been done in the past at Dolgoi is not measuring up to the Board of Fisheries mandate. A manager who relies too heavily on forecasts and not enough on actual Chignik run development for how to make decisions for the Cape Igvak and SEDM fisheries is only guessing and is also not measuring up to the regulations enacted by the Board of Fisheries. For as long as the department follows this unprofessional and aggressive style of management, the people of Chignik will be the only losers in the region.

Although our current season is not done at this point, I hope that the Dept. will in the future not be so overzealous with their decision-making and be more prepared for how they will manage Dolgoi, Igvak, and SEDM in upcoming years with fairness and better accountability.

On a more positive note, it seems like the Cape Igvak 48 hour opening beginning July 12 might be OK because the second run escapement was OK and Chignik was fishing too. None of us here in Chignik like the Cape Igvak management plan, but we do insist that the bad management style of July 2015 and June 2016 be corrected going forward.

Thank you for considering my concerns.

Sincerely, 

Don Bumpus

**Alitak Setnet Permits Fished**

1985	75
1986	79
1987	73
1988	81
1989	87

Average 79

1990	91
1991	86
1992	79
1993	76
1994	74

Average 81.2

1995	75
1996	80
1997	78
1998	77
1999	76

Average 77.2

2000	77
2001	77
2002	0
2003	65
2004	71

Average 58

2005	72
2006	60
2007	58
2008	61
2009	54

Average 61

2010	67
2011	66
2012	65
2013	58
2014	49

Average 61**Alitak Setnet Exvessel Value**

1985	\$39,538
1986	\$81,320
1987	\$46,115
1988	\$106,415
1989	\$149,702

Average \$84,618

1990	\$65,168
1991	\$57,728
1992	\$27,009
1993	\$28,164
1994	\$45,739

Average \$44,762

1995	\$60,102
1996	\$52,270
1997	\$28,989
1998	\$49,120
1999	\$35,730

Average \$45,242

2000	\$21,989
2001	\$15,356
2002	\$0
2003	\$10,927
2004	\$29,814

Average \$15,617

2005	\$26,468
2006	\$6,100
2007	\$7,896
2008	\$50,286
2009	\$48,660

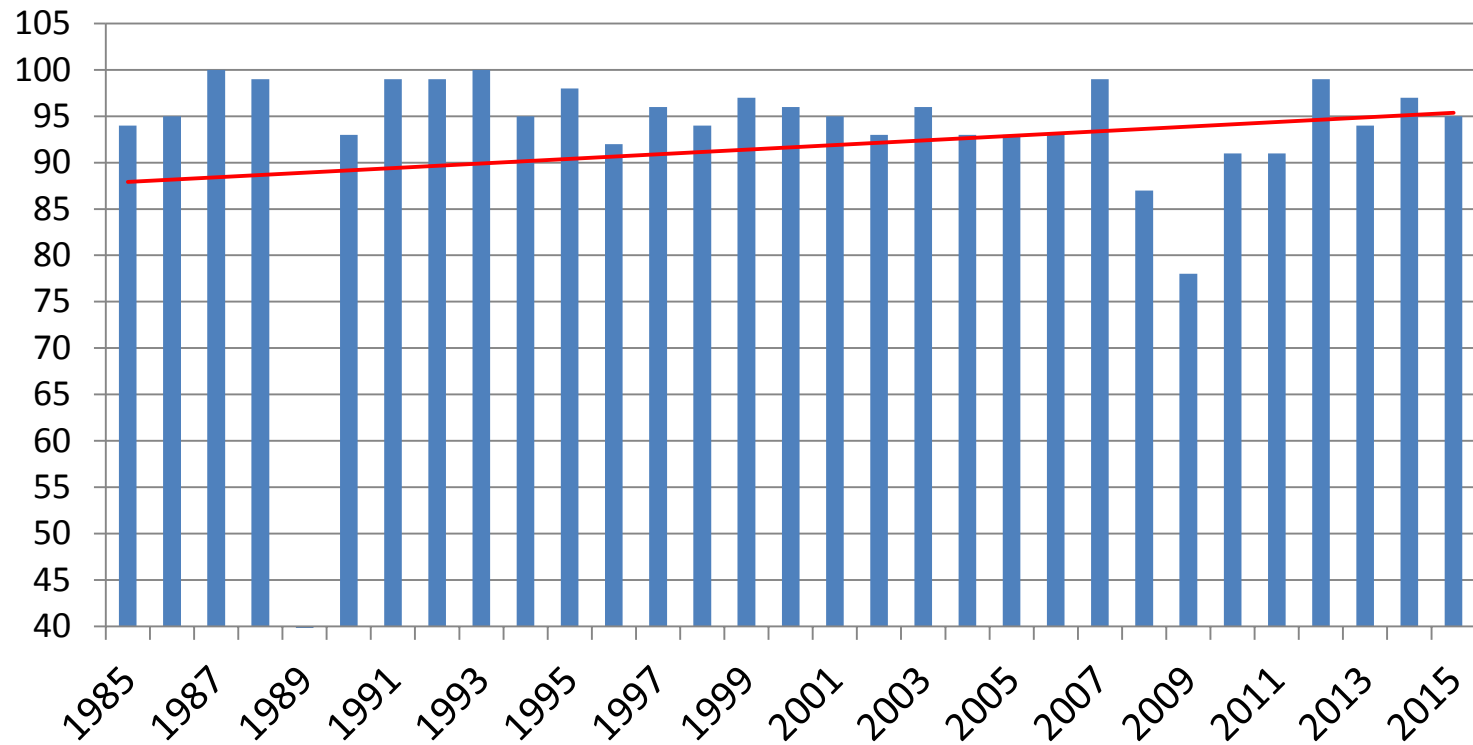
Average \$27,882

2010	\$11,955
2011	\$24,637
2012	\$28,193
2013	\$21,827
2014	\$27,920

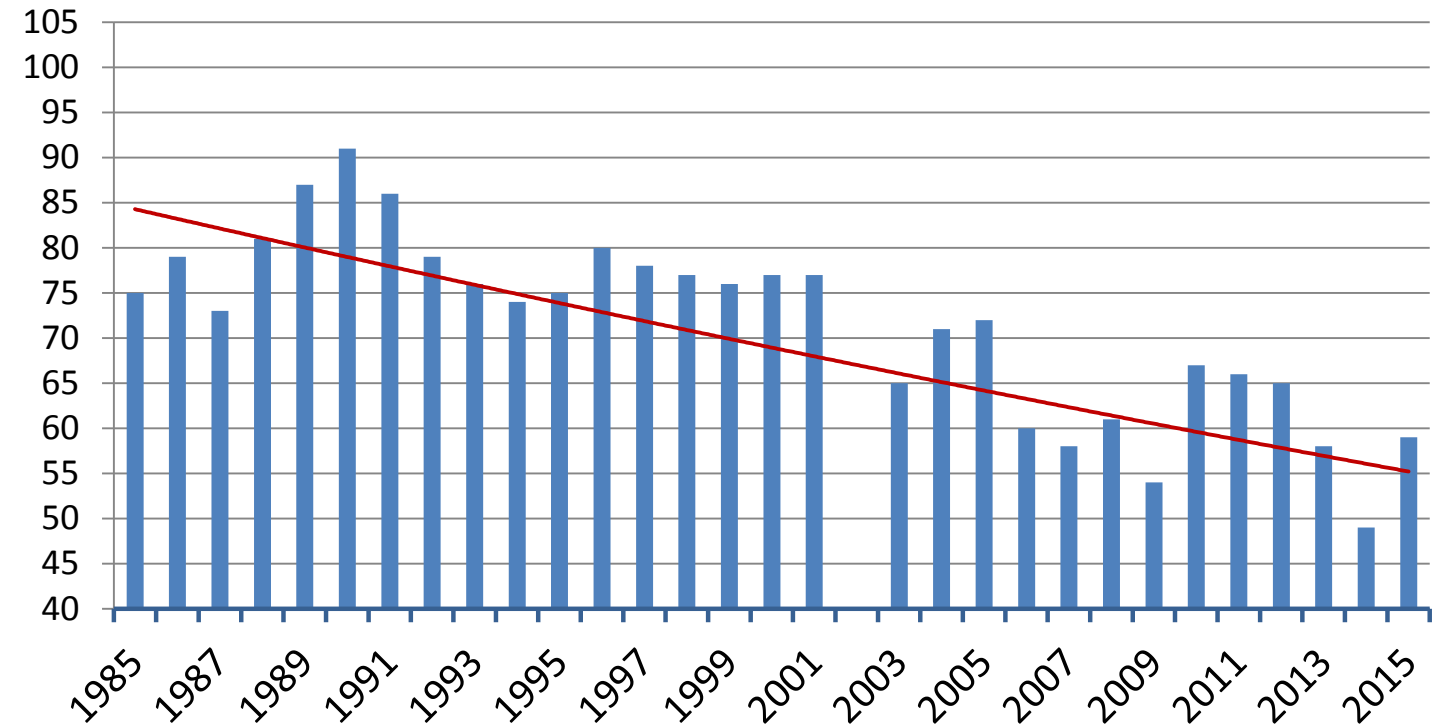
Average \$22,907



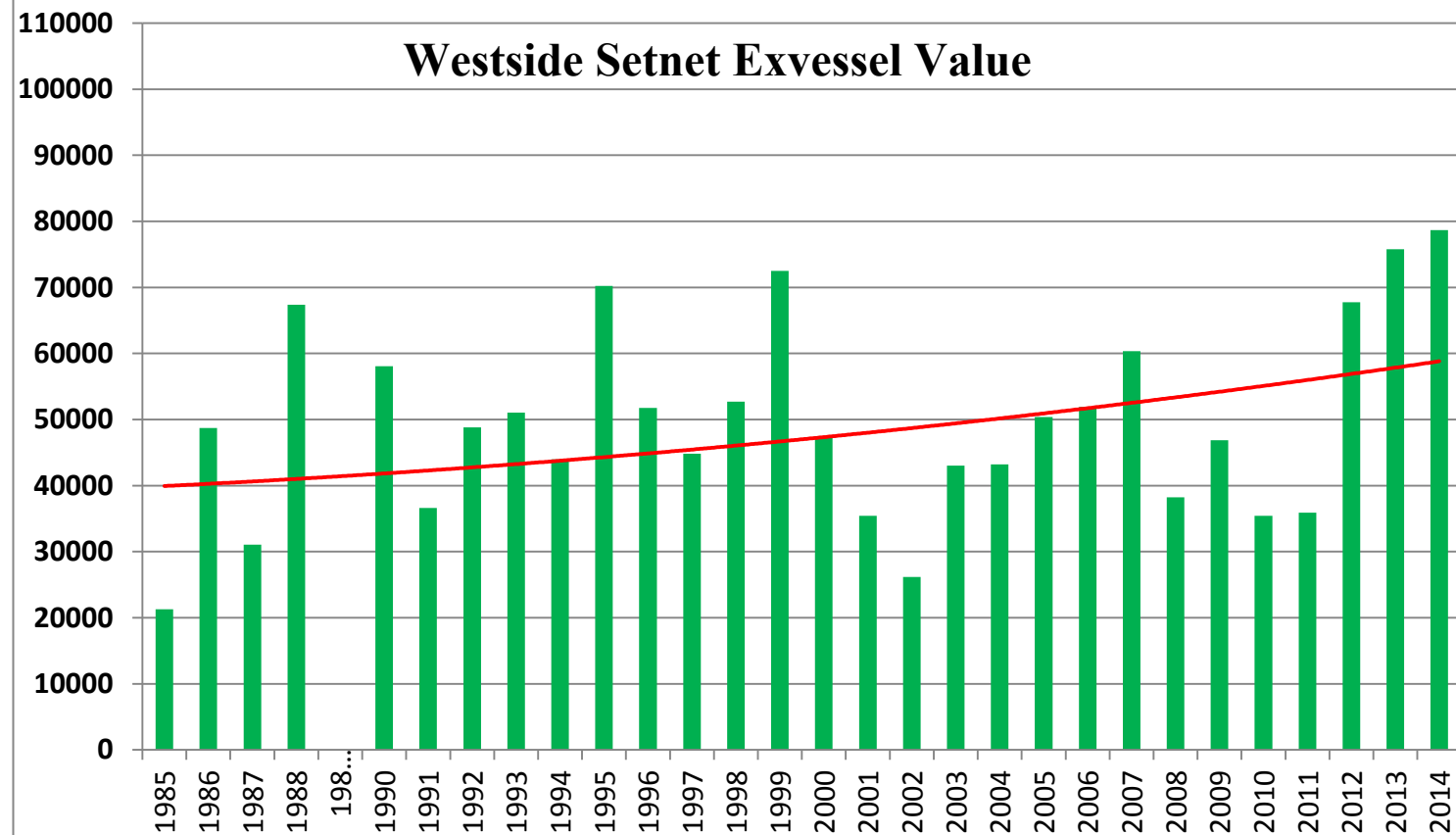
Westside Setnet Permits Fished



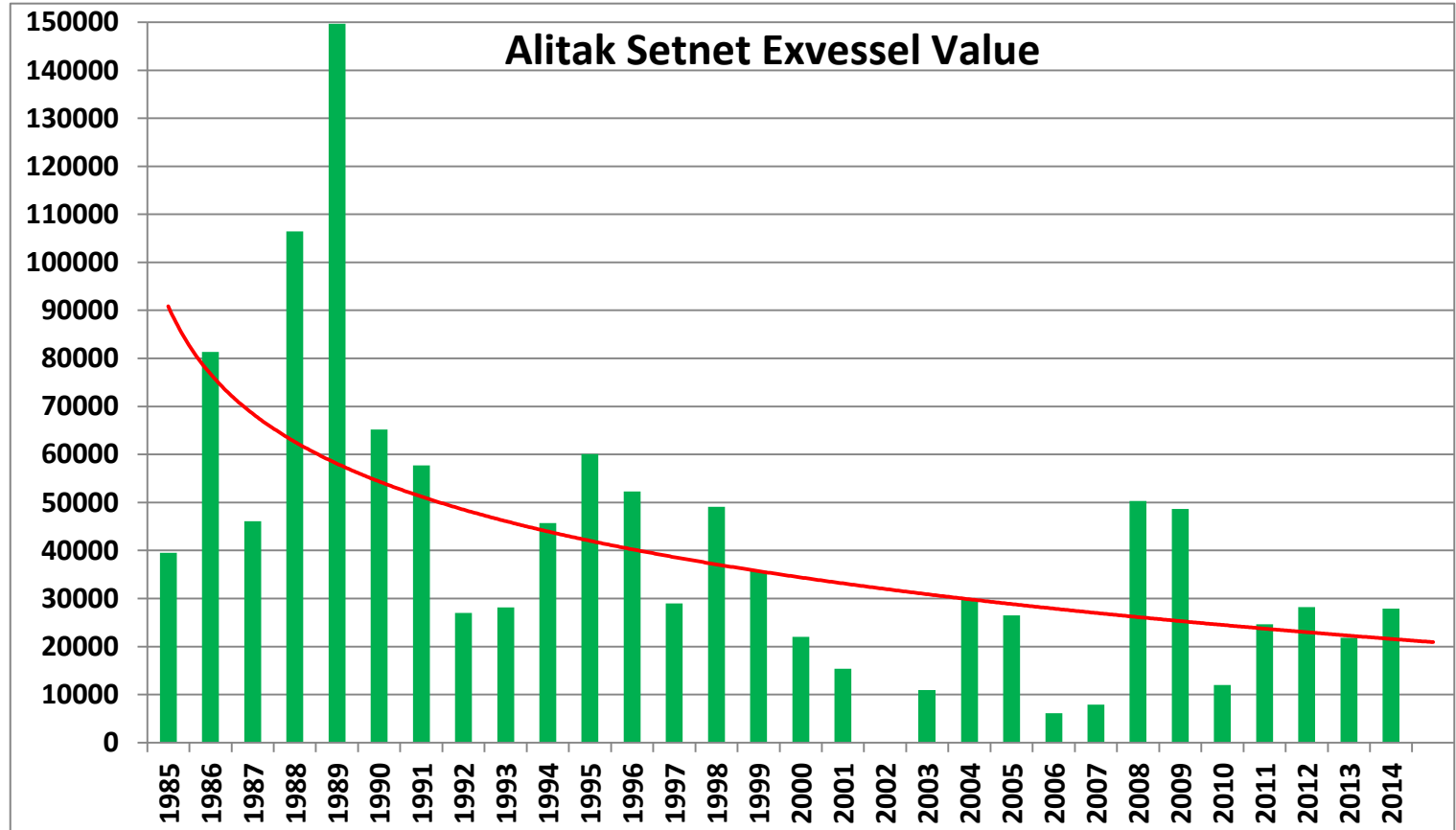
Alitak Setnet Permits Fished



Westside Setnet Exvessel Value



Alitak Setnet Exvessel Value

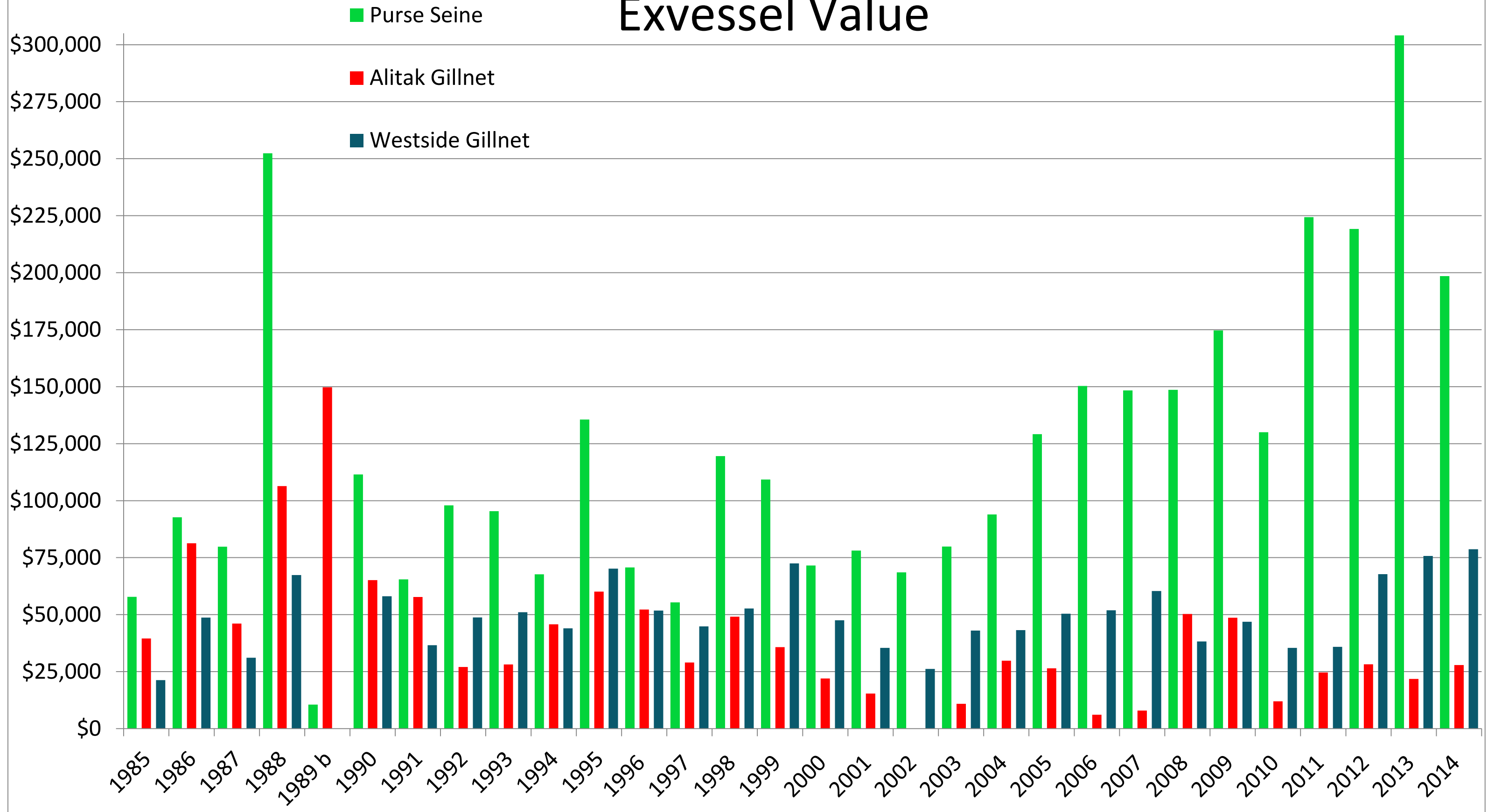


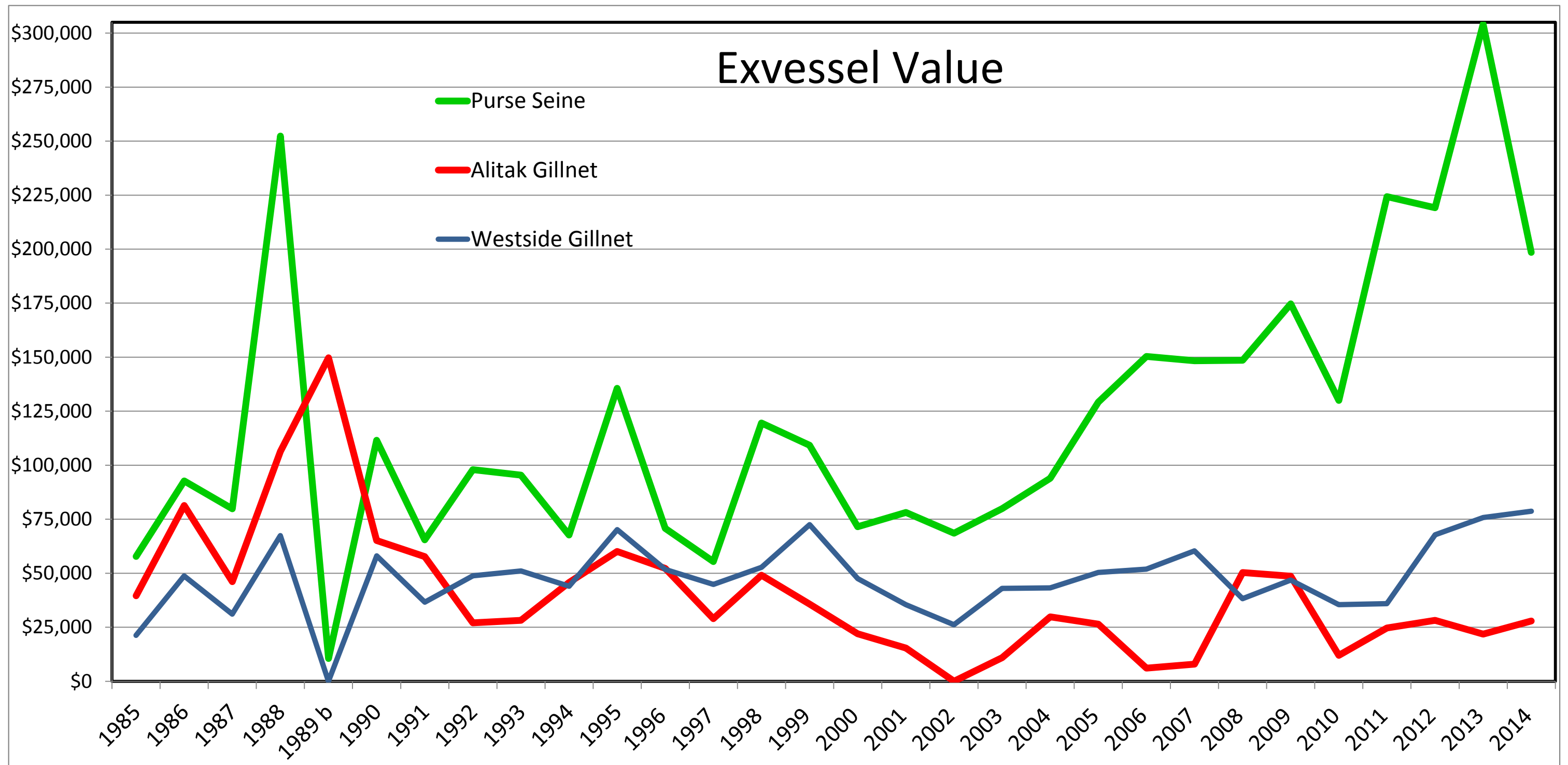
**Exvessel Value. 5 Year Average**

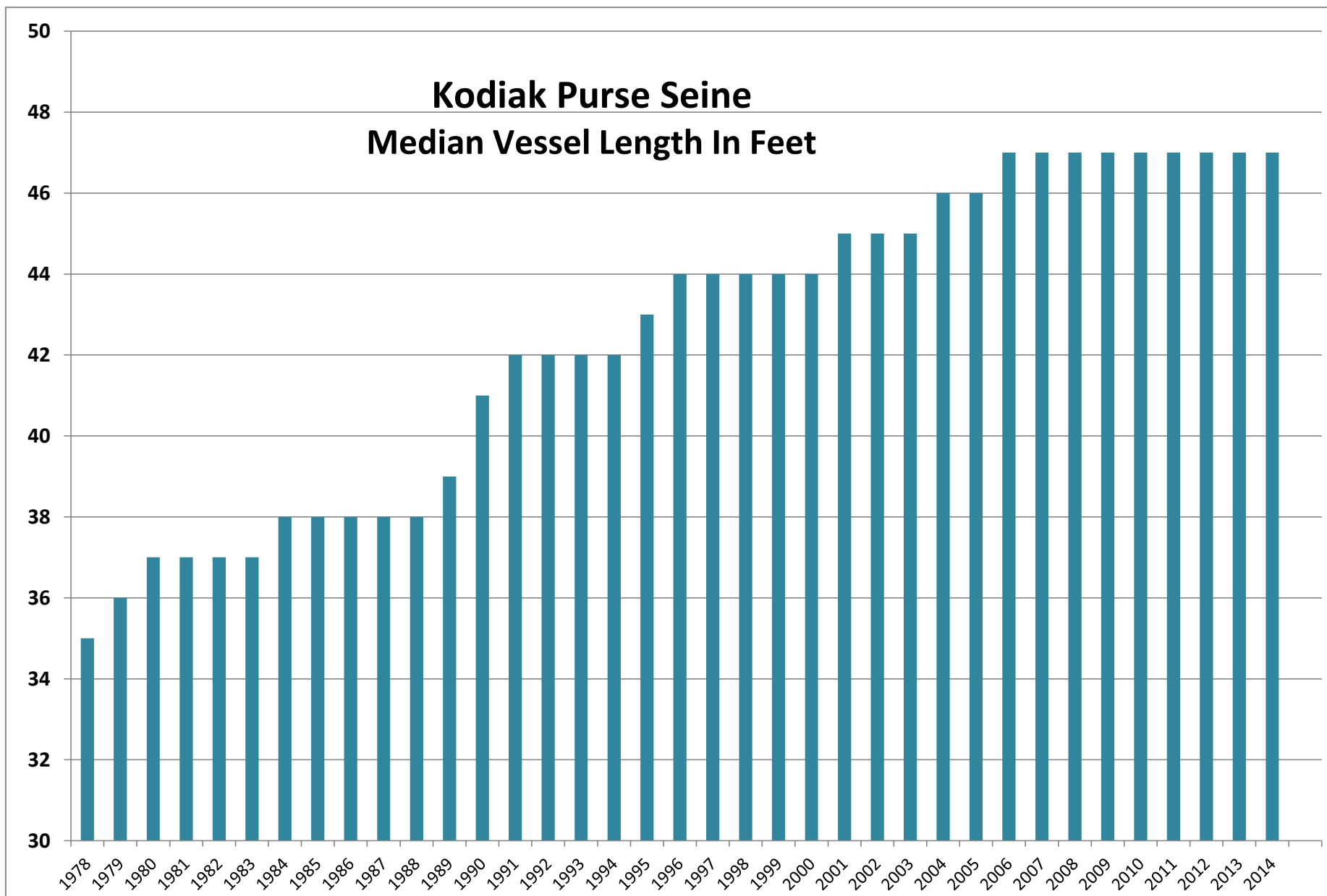
	Purse Seine	Alitak Gillnet	Westside Gillnet
1985	\$57,782	\$39,538	\$21,273
1986	\$92,693	\$81,320	\$48,721
1987	\$79,812	\$46,115	\$31,068
1988	\$252,388	\$106,415	\$67,383
1989 ^b	\$10,555	\$149,702	\$0
Average	\$98,646	\$84,618	\$33,689
1990	\$111,524	\$65,168	\$58,062
1991	\$65,445	\$57,728	\$36,596
1992	\$97,917	\$27,009	\$48,791
1993	\$95,375	\$28,164	\$51,052
1994	\$67,701	\$45,739	\$43,971
Average	\$87,592	\$44,762	\$47,694
1995	\$135,605	\$60,102	\$70,204
1996	\$70,737	\$52,270	\$51,769
1997	\$55,390	\$28,989	\$44,839
1998	\$119,512	\$49,120	\$52,706
1999	\$109,243	\$35,730	\$72,482
Average	\$98,097	\$45,242	\$58,400
2000	\$71,536	\$21,989	\$47,500
2001	\$78,114	\$15,356	\$35,445
2002	\$68,552	\$0	\$26,158
2003	\$79,869	\$10,927	\$43,006
2004	\$93,942	\$29,814	\$43,211
Average	\$78,403	\$15,617	\$39,064
2005	\$129,181	\$26,468	\$50,395
2006	\$150,318	\$6,100	\$51,895
2007	\$148,355	\$7,896	\$60,347
2008	\$148,605	\$50,286	\$38,234
2009	\$174,661	\$48,660	\$46,854
Average	\$150,224	\$27,882	\$49,545
2010	\$130,009	\$11,955	\$35,424
2011	\$224,349	\$24,637	\$35,883
2012	\$219,164	\$28,193	\$67,771
2013	\$304,105	\$21,827	\$75,751
2014	\$198,521	\$27,920	\$78,672
Average	\$215,230	\$22,907	\$58,700

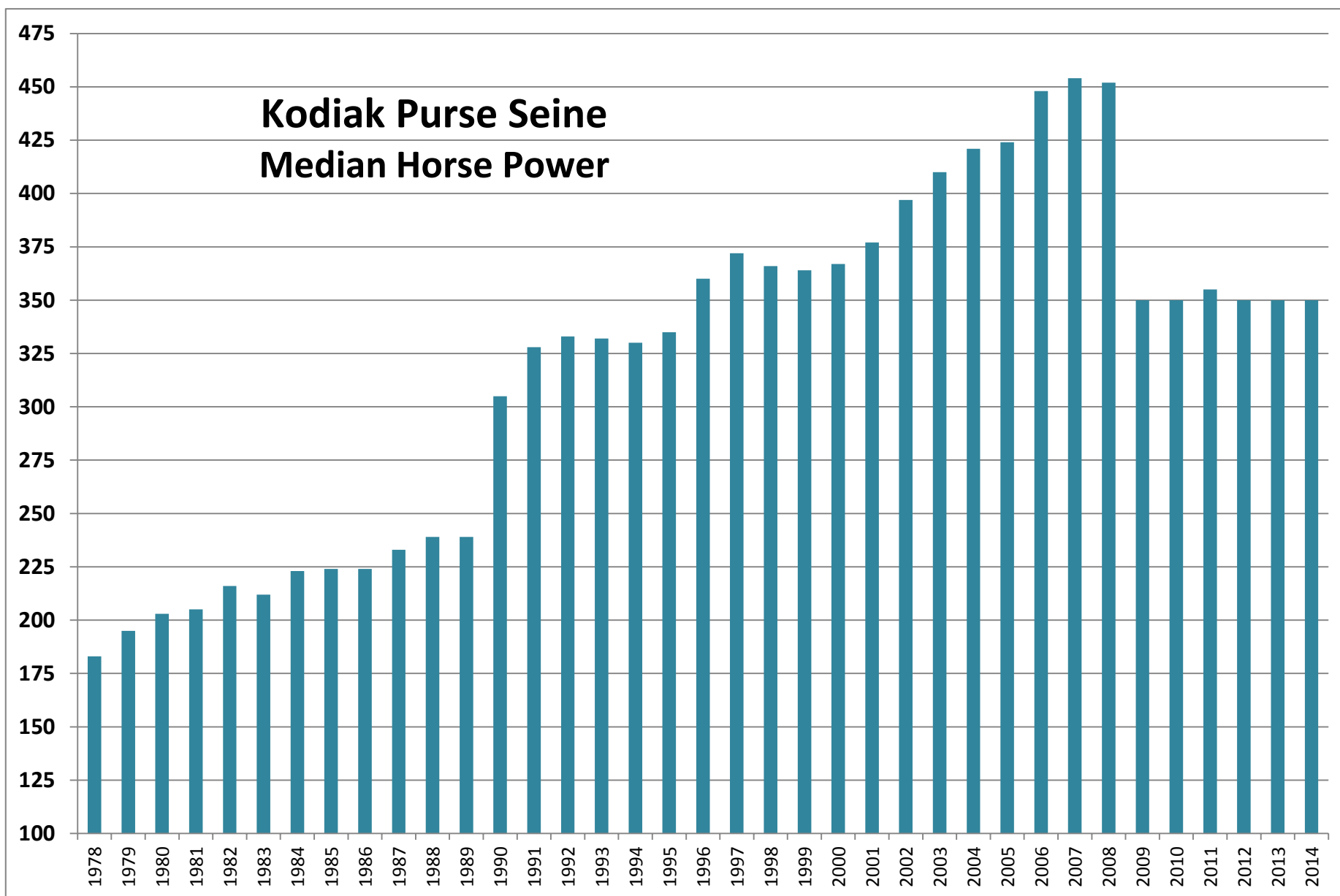


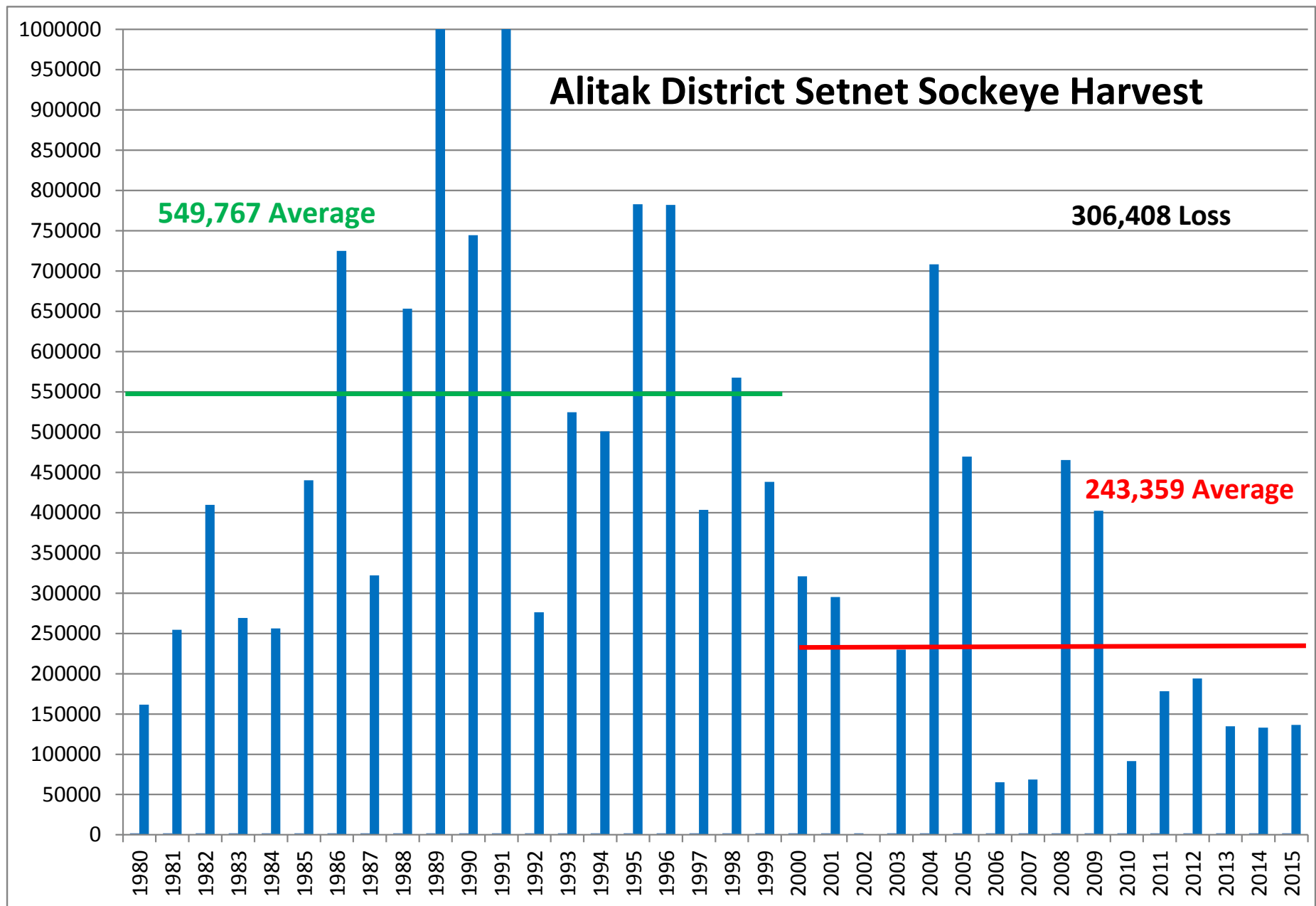
Exvessel Value













Pulse Fishing

- Is a natural way for systems to rebuild via escapement, without man made enhancement and fertilization projects.
- Allows the “Mixed Stock” and “Sustainable Salmon fisheries” to function as conservation tools as they were intended.
- Allows “Traditional Harvest Areas” for both subsistence and commercial to remain in place.
- Allows runs to stay strong for future returns and large surplus harvest opportunities for all fishermen.
- Ensures a “precautionary approach” to keeping an ecosystem/industry relationship at a healthy balance.
- Gives ADF&G the power to manage an Island migratory ecosystem more effectively than a district by district policy with political boundaries.
- The “*Burden of Conservation*” will be shared more by the *entire* migratory pathway harvest user group rather than just the *end* harvest user group.

Commercial Salmon Fishing Regulations

Migratory Habitats and Pathways should be protected

-5AAC 39.222 (c) (A) (iv) page 68

“Escapement Protection and **Precautionary** Conservation of salmon”

-5AAC 39.222 (c) (2) (D,E,F,H) Page 69

“Primary goal to **protect sustained yield**, while at the same time providing an **equitable distribution of harvest** between various users”

-5AAC 39.200 (a) page 65

Mixed Stock Fisheries. 5AAC39.220 (b) page 67

-**Burden of conservation** should be shared respective to their harvest on the stock of concern.

High Impact **Emerging** Commercial Fisheries

-5AAC 39.210. (a)



Topics of Concern for the Alitak District.

Fishing pressure is too intense island wide.

Leaving harvest areas open "Extended until further notice" is not good for salmon ecosystems. Alitak district is the only area with a mandatory pulse cycle. Alitak District sockeye fishermen are often "closed until further notice", while surrounding sections and districts are kept "open until further notice".

Migratory pathways of sockeye are known, but are not being protected.

Interception harvest issues need to be addressed. Placing the burden of conservation solely on the Alitak end user group is putting fishermen out of business. Traditional harvest areas are no longer profitable.

Lack of protection of sockeye escapement has put Alitak District runs at risk.

Escapement trends are considerably lower than what they used to be. What kind of future return size can we expect from low escapement in the lakes? Escapement should be the top priority of ADF&G, fishermen, and processors.

When ADF&G is trying to obtain escapement, more than one Section/ District should be able to be closed for the protection of that respective run. Keeping the sockeye section of the Alitak District closed has proven to be not enough protection for the runs. Minimum escapement is not always achieved.

Alitak District has some of the Islands largest salmon runs, but receives the least amount of attention via Research and Management protection.

New styles of harvesting, and advanced gear technology have emerged making harvest more efficient island wide. ADF&G has not implemented any new protective measures to counter balance the advanced fleet pressure. Pulse Fishing management style needs to be extended out beyond the boundaries of the Alitak District.

Pulse open/closures are a simple management tool that should overrule District by District management plans when minimum escapement is needed. Migration pathways and run timing always need to be considered for the health of Sockeye bound for the Alitak district.

Alitak District is a complex area to manage because of the geographic location and multiple choke points that salmon must migrate past.

This area requires more attention from both the research and management.



Submitted By
George marshall
Submitted On
12/23/2016 1:12:39 PM
Affiliation

I'm a kodiak salmon fisherman and resident and I've been fishing salmon there all my life. I'm am strongly against any changes to the cape igvak management plan, as well as any changes to the ayakulik management plan.



December 26, 2016

Board of Fisheries:

I've been a fisherman since I was a teenager and would like to say that this fishery is nothing compared to what it was back in 1956. Since this has been my career I have no other choice but to continue fishing, as this is my only job skill. I have seen some good and bad years during my time, but these past few have been the worst I have ever seen.

I remember when they opened Igvak they would open "outside" fishing, but not in Chignik Lagoon, where they usually go, and this was just to warrant an opening in Igvak, because we were told that they couldn't be open unless some part of Chignik was open. So, I amongst other fisherman scraped away at the capes with no luck. This was back in the 70's, there wasn't enough escapement but since the fish were showing in Igvak they opened it anyway. They did good all the while we weren't catching much at all. We had to travel quite a ways out within our boundaries and hardly any of the fish were sockeye, which is what we mostly fish for to make a living.

The impact of Igvak has hurt us here in Chignik and I know we would be able to provide for ourselves financially if our fish weren't being taken from us. I would hope that something will be done about this soon, as it is becoming harder and harder to make a living off of fishing anymore in Chignik.

Thank you for taking the time to listen to us,

George A. Orloff Sr.

F/V Michelle Lee

Chignik, AK 99564



Submitted By
Glen Eaton
Submitted On
8/27/2016 6:09:20 PM
Affiliation
Kingfisher Aviation

This comment is for Proposal 58.

I understand the cause of concern, yet the proposal to eliminate Jack Reds from the gene pool is trying to cover up the symptom rather than the problem. Jack Reds percentage are high due to gear type, Gill Nets which catch larger salmon and smaller are free to swim right through. I think there should be some hard data proving such a solution would work for proposal 58 before the state wastes thousands of dollars from a shrinking budget to attempt such a solution which there is no guarantee of a successful outcome.

One reason Alitak has such high Jack Red percentages is the entire NW and SW Kodiak district set net sites catch Alitak bound Red Salmon. Many of the Adults never get to Alitak because they were already caught in gill nets, but the Jacks get through because of their small size. The Jacks will always continue to get through the Gill Nets no matter how many are killed because there are genes for Jacks in all Adult Red Salmon. Jacks normally signal future run strength of the Adult run years in the future. The question should be what is happening to all the Adults, not why are there so many Jacks. The solution is to allow more Adults to get past SW and NW gill nets to the Alitak district or change gear type. I feel Killing Jacks is a futile attempt to solve a more complicated issue that is not being considered.



Submitted By
Gregory Deane
Submitted On
12/26/2016 8:51:43 AM
Affiliation
Kodiak Seiner

Phone
3609413163
Email
gregdeane@live.com

Address
15739 Yokeko Drive
Anacortes, Washington 98221

Proposals 51 through 56

I am opposed, Kodiak fishermen have been fishing the cape Igvak area for all these years , Chignik fishermen have tried to limit our catch at most Board of fish meetings. 15% has been working. To change our percentage more study needs to be done. Chignik fishermen intercept Kodiak and Cook Inlet stock .Part of our 15% at Igvak is mixed stocks. It's fishing. 15% just might not be enough for Kodiak .
Thank you, Greg Deane



Submitted By
Harvey Goodell
Submitted On
12/27/2016 11:59:22 AM
Affiliation

To the Chair and Board of Fish members.

As a Kodiak west side salmon setnetter, I would like to go on record oppsing porposals, 51,52,53,54,55,56. These proposals all propose to change the Cape Igvak Management Plan. If the Seine fleet looses any opportunity to that fishery, the effort would shift to the west side of Kodiak, impacting my fishing.

Proposals 59 I oppose! This would hinder Fish and Games ability to manage the west side salmon systems. ie the Karluk. The Karluk run is just now rebuilding after seeing over escapment in the early 2000 's. Forcing the department to close for 63 hrs. every 7 days, could cause over escapment and also reallocate fish to the seine fleet.

Proposal 61, I support. Helping out KRAA the local aquaculture association for during cost recovery is a good thing. Proposal 64 I support. The Village of Quzinkie should have first access to these fish.

Proposal 65 I oppose. The potential to gill fish is to great.
comment.
gillnetter

Thank you for letting me
Harvey Goodell Kodiak West side set



This is a transcribed copy of the handwritten letter by Ilane Ashby

12-26-16

To the board of fishery,

I've been a resident of Chignik Bay for 44 years. I grew up in Chignik and my family lives here. My parents were born and raised here in Chignik Bay back in the 1930's and 40's. They both are living in their 98 year old home. Growing up in Chignik as I remember was thriving with so many people, families and transients alike. The economy of Chignik was booming. The school count topped to 40+ students and was very active in the community for 10 months out of the year. The canneries were in full operation of processing fish and crab all year around with many job opportunities for everyone. The bay was a revolving fishery with boats and tenders. There were active businesses throughout the years, such as a community store and the village corporation Far West Inc. renting out apartments for everyone needing lodging. My dad fished, catching the best Chignik fish every year for 48 years. He retired in 1989 due to back problems. Since then he's been watching the decline of the fishery in this community go downhill rapidly. It's so sad and disappointing to know that Chignik once was a prosperous community. The past 15+ years this community has been deteriorating in the fishery, cannery, school, residence and subsistence.

Page 2

Families are struggling to make ends meet because there is a minimum of jobs in Chignik. My family is struggling because there is not enough income coming into our home to keep up on the monthly bills and to keep food on the table. Having subsistence in the freezer helps our family out during hard times. It's not always enough sometimes.

I have two sons who fish during the summer. Their income after fishing is what they have to survive on for nine months unless, one doesn't make enough to live on for the winter, having a part time job helps out tremendously to keep the income flowing a little to get by. Our family help each other the best way we can when it comes to sharing expenses to get by. My parents draw social security once a month and this is their only income to help with their expenses. They are elderly and my family and I are who take care of them when they need assistance for medical, helping around the house, running errands, paying bills or just company. I couldn't leave my parents and expect the both of them to take care of themselves. I wouldn't leave, so does that make me a horrible wife and a mother to not leave with my husband and relocate just to have a better income? I was raised to care for my elders and if I choose to do that over income so be it. 1 1/2 years ago my family and I moved into a new HUD home that I've been waiting for for over 20 years. Last year five new homes were built and Chignik by Bristol Bay HUD housing authority. NO, i'm not leaving my home and Chignik and I'm not leaving my parents.

Page 3

I would much rather not have to worry about having to choose between leaving my home and family because of being forced to decide which is better; my family or money? What kind of society are we living in? Why is Chignik on the chopping block? Maybe the answer to these questions are society nowadays is selfish and out to be better than everyone else. I say how



disrespectful and shame on you! What can be done to improve life and my home I call Chignik Bay? My community is crying out and we need somebody to listen and take action. Please, consider my letter and put Chignik Bay as your priority to make good things happen for my community and to the people who live here. Thank you.

Sincerely,

Ilane Ashby



12-26-16

①

To Board of Fishery,

I've been a resident of Chignik Bay for 44 years. I grew up in Chignik and my family lives here. My parents were born & raised here in Chignik Bay back in the 1930s and 1940s. They both are living in their 98 year old home. Growing up in Chignik as I remember was thriving with so many people, families & transients alike. The economy of Chignik was booming.

The school count topped the 40 plus students and very active in the community for 10 months out of the year. 2 canneries were in full operation of processing fish and crab all year around with many job opportunities for everyone. The bay was a revolving fishery with boats and tenders. There were active businesses throughout the years, such as a community store and the Village Corporation Far West Inc. renting out apartments for anyone needing lodging. My dad fished, catching the best Chignik fish every year for 48 years. He retired in 1989 due to back problems. Since then he's been watching the decline of the fishing and this community go downhill rapidly. It's so sad and disappointing to know Chignik once was a prosperous community. The past 15 plus years this community has been deteriorating in the fishery, cannery, school, residents and subsistence.



1 Families are struggling to make ends meet
because there's a minimum of jobs in Chignik.
My family is struggling because there's not enough
income coming into our home to keep up on the
monthly bills and to keep food on the table.
Having subsistence in the freezer helps our family
out during hard times. It's not always enough
sometimes.

I have 2 sons who fish during the summer.
Their income after fishing is what they have to
survive on for 9 months. Unless, one doesn't make
enough to live on for the winter. Having a part-time
job helps out tremendously to keep the income
flowing a little to get by. Our family helps each
other the best we can when it comes to sharing expenses
to get by.

My parents draw social security once a month and
this is their only income to help with their expenses.
They are elderly and my family and I are who take care
of them when they need assistance for medical,
helping around the house, running errands (paying bills
or just company). I couldn't leave my parents and expect
the both of them to take care of themselves.
I wouldn't leave, so does that make me a horrible wife
and mother to not leave with my husband and re-locate
just to have a better income? I was raised to care
for my elders and if I choose to do that over income
so be it. 1 1/2 years ago my family and I moved into a
new HUD home that I've been waiting for over 20 years.
Last year 5 new homes were built here in Chignik Bay
by Bristol Bay HUD Housing Authority. NO, I'm not leaving
my home in Chignik and I'm not leaving my parents.



③

I would much rather not have to worry about having to choose between leaving my home and family because of being forced to decide which is better my family or money? What kind of society are we living in? Why is Chignik on the chopping block? Maybe the answer to these questions are society nowadays is selfish and not to be better than everyone else. I say how disrespectful and shame on you! What can be done to improve life in my home I call Chignik Bay? My community is crying out and we need somebody to listen and take action.

Please, consider my letter and put Chignik Bay as your priority to make good things happen for my community and to the people who live here. Thank-you.

Sincerely,

Maureen Abby



Submitted By
James Bo Calhoun
Submitted On
12/27/2016 12:19:22 PM
Affiliation

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Homer, Alaska 99603

ATTN: BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56 and Proposal 59

Dear Chairman Jensen and Board Members,

Thank you for taking the time to read my comments in opposition to Proposals 51 through 56, regarding the Cape Igvak Management Plan. I'm a Kodiak salmon seiner and have been fishing the Cape Igvak section for almost thirty years, starting as a child on my father's boat and now on my own boat. This fishery has provided a significant opportunity for my family and has become an important part of our livelihood.

Kodiak salmon fishers have historically harvested sockeye from the Cape Igvak section, prior to both limited entry and the implementation of the Cape Igvak Management Plan. Since its creation in 1978, the Cape Igvak Management Plan has been conservatively executed. Igvak fishers have taken on average 12% of the total Chignik sockeye harvest, significantly less than the goal of as near as possible 15%. Moreover, the Cape Igvak Management Plan is now based on the assumption Igvak sockeye harvest is up to 90% Chignik bound. Recent genetic studies (Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016) indicate Chignik bound sockeye harvested in Igvak might be significantly lower than 90%. The single data point for the early temporal stratum (June), the period when Igvak harvest is likely to catch the highest concentration of Chignik bound sockeye, showed an Igvak harvest of only 74.1% Chignik bound sockeye. The new genetic data composes too small a sample size to yield significant conclusions, but I will be interested to see future results. The Cape Igvak section has been managed conservatively, making sure Kodiak fishers have, on average, caught fewer Chignik bound sockeye than allocated. There is no managerial reason to lessen the sockeye allocation for Igvak fishers in the Cape Igvak Management Plan.

A primary rationale presented for these proposals is that Chignik fishers are suffering from changing economic conditions, necessitating a shift of Sockeye allocation from Kodiak to Chignik. However, Chignik fishers have averaged higher earnings than Kodiak fishers over the past ten years, with 2016 seeing a particularly large disparity. In 2016, the average active permit in Chignik sold salmon worth \$125,159, compared to an average ex-vessel value of \$66,243 in Kodiak. Additionally, according to the most recent estimates from the CFEC (from November 2016), Kodiak permits are valued at approximately \$38,300, while Chignik permits are valued at approximately \$167,200. The proposed changes to the Igvak Management Plan for economic reasons are unjustified.

There have been no changes to either Chignik or Kodiak fisheries that warrant changing the historical sockeye allocation delineated in the Cape Igvak Management Plan, and I urge the board to reject Proposals 51-56.

I'd also like to comment in opposition to Proposal 59, which would require a 63 hour closure of the Westside Kodiak District and the Alitak District every seven day fishing period. This proposal would inhibit successful management of local Westside and Alitak salmon runs, as noted by the ADF&G staff comments, and I urge the board to reject it.



Thank you for the opportunity to comment on these important proposals.

Sincerely,

James Bo Calhoun

Owner F/V Thalassa LLC

Third generation and lifelong Kodiak salmon seiner



Submitted By
James C Calhoun
Submitted On
12/27/2016 11:13:03 AM
Affiliation
Kodiak Fisher

Chairman Jensen and Board of Fish Members-

I started fishing when I was 7 years old with my father in Cook Inlet and then fished the Kodiak area in the 1960's with him. I started running my own boat in Kodiak in 1970 and quit fishing 2011 due to health issues. So i fished the Kodiak area for approximately 40 yrs. I am still a permit holder for SO1K. During that time the Cape Igvak fishery provided a significant part of my income as it does for my son who now fishes my old boat.

Cape Igvak has been a contentious issue for many BOF cycles with very little new info. One new piece of data indicates through genetic testing that the percent of chignik fish caught at Cape Igvak in June 2016 was 74.1% instead of the allocated 90% that is in the present management plan.

Several of the proposals cited economics as a reason for decreasing the catch at Igvak.. In 2016 ex-vessel value in Kodiak was approximatel \$66,000 about half of Chigniks' \$126,000. Permit utilization 2005 to 2016 in Kodiak is about 42% and Chignik is about 70%. If looking at economics for 2016 between the two areas, Kodiak is definitely in last place.

I am opposed to proposals 51-56. Thank you James C Calhou



Submitted By
James R Horn
Submitted On
12/27/2016 6:44:04 PM
Affiliation

Phone
907-317-3159
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venturess1@gmail.com
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Kodiak, Alaska 99615

ATTN: BOF Co

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56, 62 and 63

Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan.

I am a second generation Kodiak Area Salmon seiner. My first trip to Igvak was 49 years ago with my Dad as an 11-year-old. I began operating my own seiner in 1980.

I have fished Igvak every year it has been open since. Some years Igvak is a significant % of my income.

Every 3 years I come before the board to defend my livelihood from proposals with vague and misleading opinions presented as facts.

The Kodiak sockeye harvest is divided between **188 Set Net** permits, as well as a possible **384 Seine Permits**. Chignik would have you believe the seine fleet alone enjoys a 2 million average sockeye harvest.

Economics affect Kodiak just as they affect Chignik. Kodiak and Chignik fishermen have many of the same alternative fishery resources. No King Crab Fishery, a Tanner crab fishery that has been closed for 4 years and is depressed at best when open. Winter Pot Cod fishing with a shallow draft seiner is not economically feasible or safe. Herring stocks are depressed along with a severely depressed market.

The Cape Igvak plan as written works and errs in favor of Chignik. The 36-year average allocation to Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals.

Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan.

Proposals 62 and 63 would have you believe there is a salmon seine at the mouth of Ayukulik River all the time when in fact Inner Ayakulik has been open a total of 24 days in the last 14 years, 14 days occurred in 2014 and 8 of the 24 days occurred after 96% of the escapement had passed the weir. For the parent years 2010-2014 there was no fishery in the Inner Ayakulik section, thus seining activity at the mouth of Ayukulik had no bearing on weak returns.

I ask the Alaska Board of Fisheries reject proposals 51-56, 62 and 63.

Thank you for your consideration.



PC30
2 of 2

Respectfully, James R Horn

F/V Venturess

1776 Mision Rd Kodiak, Ak 99615



BOF – Kodiak finfish 12/27/2016

James Pryor

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jlpryor@gci.net

1012 Steller Way,

Kodiak AK. 99615

Proposal 59 5AAC 18.361 Alitak Management Plan,
5AAC 18.362 Westside Management Plan

Proposal 65 5AAC 18.332 Seine specification and operation

I support proposal 59, which mandates a “pulse fishery” along the Westside and Southwest Districts of Kodiak Island. I have written comments that address the state of the sockeye systems that originate in Olga Bay and have suggestions that should be considered by the BOF as alternatives to amend the proposal.

In addition I have listed Proposal 65, which is seine specification and operation. I oppose the proposal as written, but present an amendment for an additional seine operation change that could have an important positive effect on migratory pathways of sockeye salmon in the Kodiak archipelago.

Genetic testing of the Kodiak Island sockeye salmon stocks has revealed the significant interception of Olga Bay bound reds along the western and southwestern island coastline. The number of sockeyes that are intercepted is not an overwhelming number in relation to the size of the overall catch in the Westside District, but when viewed in context to the depleted stocks of the Upper Station (South Olga Lakes) both early and late run, along with the Frazer Lake run, the interception is significant and damaging to the health, genetic diversity and economic viability of the fishery. I have included a chart detailing the catch and return to the Alitak District as well as the interception numbers.

Since the inception of the OEG (optimum escapement goal) on the early Upper Station sockeye run by the BOF, the subsequent strong run management plan implemented by ADFG that heavily fished the Frazer run that was already in decline, and the reduction of healthy escapement into Frazer by lowering escapement goals and a massive influx of jacks, production has nosedived in all sockeye systems originating in Olga Bay. Productivity and genetic diversity has declined to such a point in Olga Bay that small natural sockeye systems such as, Horse Marine, and Silver Salmon have virtually disappeared. In addition the natural sockeye run into the Akalura system, was all but ignored by management. This system was at one time the fourth largest natural run of sockeye on Kodiak.

The set net fishermen alerted the BOF to the serious consequences of the OEG on both the early and late run sockeye into Upper Station, and the unprecedented jack numbers into the Frazer Lake run. The BOF, during the 2014 meetings, saw fit to address both of these serious issues. The OEG placed on Upper Station was replaced by a BEG (Biological Escapement Goal) and ADFG was mandated to bring forward a plan to decrease jack sockeye into Frazer Lake. The new BEG on the Upper Station early run placed the burden of conservation squarely



on the shoulders of one user group, the Alitak set net fisher families. That group alone sacrificed the loss of significant fishing time, with grave economic consequences, which resulted in the disruption of family businesses, and had far reaching social impact as younger family members could not remain in the fishery. The BOF salmon sustainability policy clearly states (see attached policy excerpts) the burden of conservation to rebuild a salmon stock needs to be shared among all user groups. This has not happened as Olga Bay bound sockeye have been intercepted in the Westside and Southwest District in a significant percentage relative to sockeye returns to the Alitak District as the recent genetic testing has proved. Sockeye interception and continued weak runs in the Olga Bay systems have jeopardized the economic viability of the traditional set net fishery and threaten to tear the social fabric of this community that depends on a healthy sockeye return.

The BOF, through the implementation of an unprecedented OEG on a robust natural sockeye run with a history of 7,000 years of wild production, and negligence of ADFG to monitor the impact of lower escapement has reduced this once prosperous and productive systems to a shadow of its former status. The Olga Bay sockeye systems are not productive because of man-made mistakes in management. The traditional set net fishery and subsistence users have suffered with little relief in sight.

There are possible solutions that the BOF should consider to bring some relief to families affected by weak sockeye returns and assist in rebuilding these runs.

1 14 updated 10/1/12s

5 AAC 39.222. Policy for the management of sustainable salmon fisheries

(a) The Board of Fisheries (board) and Department of Fish and Game (Department) recognize that

(2) in formulating fishery management plans designed to achieve maximum or optimum salmon production, the board and department must consider factors including environmental change, habitat loss or degradation, data uncertainty, limited funding for research and management programs, existing harvest patterns, and new fisheries or expanding fisheries;

(iv) all essential salmon habitat in marine, estuarine, and freshwater ecosystems and access of salmon to these habitats should be protected; essential habitats include spawning and incubation areas, freshwater rearing areas, estuarine and nearshore rearing areas, offshore rearing areas, and migratory pathways;

(v) salmon habitat in fresh water should be protected on a watershed basis, including appropriate management of riparian zones, water quality, and water quantity;

(B) salmon stocks should be protected within spawning, incubating, rearing, and migratory habitats;



Proposal 65 Seine specification and operation

The expanding fishery is the growing efficiency and capacity of the Kodiak salmon seine fleet. Seine boats have the ability to cut off migratory pathways of southbound returning sockeye by fishing seine to seine outside of each other, sometimes five in a line, which results in over a mile of nets to intercept the fish. This capacity to effectively cutoff migratory pathways is a result of a seine fleet that has steadily expanded in the length, depth and weight of seines, a significant increase in boat size and holding ability, electronics that allow boats to fish around the clock, and power skiffs that have increased in size and horsepower allowing fishing in all weather conditions. The BOF should consider amending 5AAC 18.335 seine operation to restricting seining no farther than 300 fathoms from any shoreward point. This would not allow seine boats to fish in a line outside of other seines and allow some relief to sockeye traveling migratory pathways. Seine restrictions would also help balance some of the burden of conservation in rebuilding sockeye runs that originate in Olga Bay. Currently the sole burden of conservation to rebuild these sockeye stocks resides with the set net fishers of the Alitak District. The BOF policy clearly states burden of conservation should be distributed amongst all user groups. The genetic testing has proven that seines along the Westside and Southwest District of Kodiak are intercepting Olga Bay bound sockeye and should shoulder some of the conservation burden.

(D) an understanding of the proportion of mortality inflicted on each salmon stock by each user group, should be promoted, and the burden of conservation should be allocated across user groups in a manner consistent with applicable state and federal statutes, including AS 16.05.251 (e) and AS 16.05.258 ; in the absence of a regulatory management plan that otherwise allocates or restricts harvests, and when it is necessary to restrict fisheries on salmon stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use, consistent with state and federal law;

3

The second solution is a change in 5AAC 18.362 Westside Management Plan

e) The Inner and Outer Karluk Sections must be managed

(1) from June 1 through July 15, based on early-run sockeye salmon returning to the Karluk system; the commissioner may open, by emergency order, fishing periods in the Inner Karluk Section only if the department determines that the desired early-run escapement goal will be exceeded; in the Outer Karluk Section, from June 16 through approximately July 15, the commissioner shall open fishing periods to occur at the same time

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KODIAK AREA



as open fishing periods in the Central Section;

If ADFG has the management flexibility to open Inner Karluk without the restriction of exceeding escapement and opening the Central Section at the same time, this would allow excess sockeye escapement that has built up in the Inner Karluk section to be mopped up. If sockeye escapement into Karluk can be controlled with this management tool it will allow closures to occur and potentially take some pressure off sockeye traveling in the migratory pathway down the west side of Kodiak Island. Pulse closures will distribute the burden of conservation in a more equitable distribution of Kodiak stakeholders and assist in the rehabilitation of the Olga Bay sockeye systems.

A third solution is a change in 5AAC 18.361 Alitak Management Plan

In years when a harvestable surplus beyond escapement goals for the early Upper Station and Frazer Lake sockeye runs is expected to be less than 150,000, there will be no commercial salmon fishery allowed at Cape Alitak section until a harvest of 75,000 sockeye salmon in the Alitak, Moser and Olga Bay sections is achieved. After July 8th the seine harvest is not to exceed 50% of the total Alitak District sockeye catch.

A threshold number needs to be made for the set net fishery by date to provide a fair and adequate terminal harvest before the interception by the seine fleet were to begin in the Alitak District. Olga Bay sockeye returns have been severely impacted by interception and run yields have dropped precipitously in the last twenty years. The set net fishery has been curtailed to allow increased escapement to rebuild the sockeye run at Upper Station. The set net fishery has shouldered the entire burden of conservation for the sockeye system rehabilitation and should be allowed to benefit for the sacrifice of fishery time during that last three seasons. The seine fleet is by definition a mobile gear type and has exclusive fishing zones that give it the ability to intercept sockeye along the migratory pathways around Kodiak Island.



Tables for interception and returning sockeye:

Upper Station/Akalura Harvest

	2014	2015	2016
Uganik-Kupreanof	8,203	966	-
Uyak	13,411	-	2,006
Karluk-Sturgeon	13,723	4,045	3,810
Ayakulik-Halibut Bay	20,529	11,691	4,142
W & SW COMBINED HARVEST	55,866	16,702	9,958
Alitak District Selnors Harvest	8,829	12,665	17,264
Estimated Alitak Setnet Harvest	14,224	26,152	
Total Alitak District Harvest	23,053	38,817	
Escapement Total ER+ LR	218,234	187,337	
TOTAL RUN Escapement + Harvest	297,153	242,874	
W & SW COMBINED HARVEST	18.80%	6.88%	
Total Alitak District Harvest	7.81%	15.98%	



Ayakulik/Frazer Harvest

	2014	2015	2016
Uganik-Kupreanof	17,431	3,715	1,380
Uyak	29,466	2,258	7,264
Karluk-Sturgeon	45,406	15,081	5,115
Ayakulik-Halibut Bay	236,602	252,727	62,295
W & SW COMBINED HARVEST	328,905	273,781	76,054

Alitak District Seiners Harvest	66,942	55,537	24,579
Estimated Alitak Setnet Harvest	112,031	89,556	
Total Alitak District Harvest	178,937	145,093	
Escapement Total Frazer Lake	200,296	219,093	

70% Ayakulik / 30 % Frazer 230,234 / 98,671 191,647 / 82,134
W & SW COMBINED HARVEST

70% Frazer / 30% Ayakulik 46,859 / 20,083 38,875 / 16,662
Alitak District Seiners Harvest
 Estimated Alitak Setnet Harvest **112,031** **89,556**

TOTAL RUN Escapement + Harvest **457,857** **429,658**
W & SW COMBINED HARVEST 21.5% at (30%) 19.1% at (30%)
Alitak Setnet + Seiner(70%) Harvest 34.7% at (70%) 29.8% at (70%)

	2014	2015	2016
W & SW COMBINED HARVEST	328,905	273,781	76,054
<u>50/50 Frazer</u> /Ayakulik Sockeye <u>164,452</u> /164,452 <u>136,890</u> /136,890 <u>38,027</u> /38,027			
<u>40/60 Frazer</u> /Ayakulik Sockeye <u>131,562</u> /197,343 <u>109,512</u> /164,269 <u>30,421</u> /45,633			
<u>30/70 Frazer</u> /Ayakulik Sockeye <u>98,671</u> /230,234 <u>82,134</u> /191,647 <u>22,816</u> /53,238			

Alitak District Seiners Harvest	66,942	55,537	24,579
<u>50/50 Frazer</u> /Ayakulik Sockeye <u>33,471</u> /33,471 <u>27,768</u> /27,768 <u>12,289</u> /12,289			
<u>60/40 Frazer</u> /Ayakulik Sockeye <u>40,165</u> /26,777 <u>33,322</u> /22,215 <u>14,747</u> /9,832			
<u>70/30 Frazer</u> /Ayakulik Sockeye <u>46,859</u> /20,083 <u>38,875</u> /166,62 <u>17,205</u> /7,374			

Source:

Fishery Data Series #16-19
 Kodiak Management Area Salmon Escapement and Catch Sampling Results 2015
 Fishery Data Series #15-20
 Kodiak Management Area Salmon Escapement and Catch Sampling Results 2014
 Fishery Manuscript Series No. 16-10 Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area 2014-2015
 Genetic Data: Uganik-Kupreanof, Tables 3-14, pp. 34-45
 Genetic Data : Uyak, Tables 15-26, pp. 46-57
 Genetic Data: Karluk-Sturgeon, Tables 27-38, pp. 58-69
 Genetic Data: Ayakulik-Halibut Bay, Tables 39-50, pp. 70-81



Submitted By
John Pierszalowski
Submitted On
12/26/2016 6:53:34 PM
Affiliation

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

RE: Opposition to Proposals 51 through 56

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. I am a Kodiak salmon seine fisherman and have been participating in the Cape Igvak fishery when allowed by the Management Plan for 46 years. The plan is consistent, easy to understand and equitable as it is written. I do not see any reason for making changes to this plan. Nothing has changed biologically. Economically, Chignik fishermen still reliably get their share every season. Kodiak Fish and Game manages this fishery so that Kodiak's 15% share is close every year. It has averaged 12% for the last 36 years. This plan has been successfully allocating fish for over 40 years and has provided stability to both Chignik and Kodiak salmon fishermen and their communities.

Therefore, I ask the Alaska Board of Fisheries to make no changes to this plan and reject proposals 51-56.

Respectfully,

John Pierszalowski, F/V Shawnee, Kodiak



Submitted By
Judy Fisher
Submitted On
12/26/2016 8:28:11 PM
Affiliation

December 26, 2016

Dear Board of Fish Member,

I would like to call your attention to a problem that fishermen in the Alitak District have. We are not getting enough sellable harvest to stay in business.

In the 23 years that Trap Point Fisheries has been operated as family partnership business, we have seen the decline in harvest get so bad that many of our neighbors have quit, sold out, or just cannot afford to show up. We struggle to keep our family as crew.

We feel there are four main problems in the management of the runs returning to the Alitak District.

1. The reduction of the escapement into all the Alitak stocks has left the Alitak District with a smaller number of fish to harvest.
1. The reduced escapement into Frazer is creating a side effect, with not enough fish to compete for the abundance food, the fish are over eating, these over eaters are getting big too soon and leaving the system early, then coming back earlier than normal as Jacks.
1. Counting these undersized returning salmon as part of the viable escapement as if they were normal full sized adults has another detrimental side effect. They are mostly males. Counting these returning jack salmon as viable escapement, in order reach the escapement goal for any given year is deceptive. This practice does not balance the spawning fish to a 50/50 male/female ratio.
1. Interception is a problem for the Alitak District bound fish. The migratory pathway for all Alitak stocks is through the Westside management plan area, which is managed primarily based on the Karluk return. We as fisherman know that if Karluk has a strong return, and has little to no closers through the season, Alitak stocks suffer. Fishermen in the Alitak district are then forced to bear the complete burden of conservation for the Alitak stocks.

Proposed Solutions:

1. Increase the escapement into the Alitak district stocks by raising the escapement goals.
1. Putting more full sized adult fish into Frazer will better balance the fish to food ratio and reduce the amount of "jacking" salmon.
1. Stop counting Jacks as viable spawners. Stop using jacks to meet the escapement goals.
1. Manage the Westside with more consideration for the Alitak stocks because the Alitak stocks are caught in the Westside management plan area, thus spreading the burden of conservation among all the users.

Sincerely,

Trap Point Fisheries permit holders and Crew



PC33
2 of 2

Ed Fisher, Judy Fisher, Kevin Fisher, Mikayla Fisher, Dylan Fisher

Jason Watt, Corina Watt, Palmer Watt, Jens Watt, Otto Watt

Kenneth R. Christiansen
1849 Marmot Drive
Kodiak, AK 99615



PC34
1 of 1

December 24, 2016

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

RE: Opposition to Proposals 51 through 56

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. My name is Ken Christiansen. I started seining for salmon in the Kodiak area with my father at the age of 6 in 1968. At the age of 16, the season of 1978, I began running my own boat which was leased from my father. I have been fishing for salmon for most of my life in the Kodiak area. There have been many good seasons financially and many bad, but I don't attribute these fluctuations to the management plan currently in place. I attribute it to the value of the salmon, which in my opinion could be changed if we fishermen came together throughout the state to fight for better prices. Instead we fight amongst each other for a bigger share of the pie, and miss the big picture.

I oppose proposals 51 through 56. My reasons are that the Chignik salmon fishery is a shorter season with less competition and higher average earnings than the Kodiak fishery; I do not believe there are valid arguments for changing the management plan. The Chignik Salmon fishery is approximately 6 weeks long. The Kodiak salmon fishery lasts approximately 14 weeks. The Kodiak salmon fishery is comprised of multiple gear types, Chignik only has seiners. Between the seiners, set-netters and the beach seiners, Kodiak has almost 6 times more permits competing than Chignik. Finally, in 27 of the last 37 years, Chignik fishermen have maintained higher gross average earnings per permit for salmon than the Kodiak fishermen. The Cape Igvak section fishery is a component of both area fisheries and a fair plan has been in place to allocate a portion of that run to each group interested in catching those fish.

I would like to reiterate my belief that the problem lies with the ex-vessel prices for salmon rather than the management plan and there is no reason to argue and fight to change the regulations. Why change a management plan that has been proven to work for both areas? I ask that you do not make changes to this plan; please reject proposals 51-56.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ken Christiansen'.

Ken Christiansen
f/v Mary Ann



KODIAK NATIONAL WILDLIFE REFUGE COMMENTS ON
ALASKA BOARD OF FISHERIES PROPOSAL #58
for the
KODIAK MANAGEMENT AREA

State of Alaska

Board of Fisheries Meeting

January 10 – 13, 2017

Anchorage, Alaska



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Kodiak National Wildlife Refuge
1390 Buskin River Road
Kodiak, Alaska 99615-0323
(907) 487-2600



IN REPLY REFER TO
Underwood

December 14, 2016

John Jensen
Chair, Alaska Board of Fisheries
ADF&G Boards Support,
P.O. Box 115526,
Juneau, AK, 99811-5526

Chairman Jensen,

Kodiak National Wildlife Refuge (Refuge) is obligated to comment on Proposal #58 currently before the Alaska Board of Fisheries (BOF). The Kodiak Office of the Alaska Department Fish and Game (the Department) has kept the Refuge apprised of their response and consulted on the internal memorandum (dated 12/7/2016; here after the "Memorandum") to the Regional Supervisor, Region IV Division of Commercial Fisheries from the Regional Finfish Research Supervisor and Regional Finfish Research Biologist. We commend the Department for their excellent analysis.

The Refuge, from a biological perspective, agrees with the Memorandum and would highlight a few of its conclusions. First, we agree with the conclusion that "the potential for in-river jack culling to mitigate future jack returns is poor." A certain number of jack sockeye salmon will remain in the returns and the percentage will continue to fluctuate among years. Second, we agree that several risks are associated with a culling program, including loss of nutrients to the lake, lack of fertilization during spawning, and potential to reduce the population variation in genetic structure. Targeting a specific life history may also target alleles on specific chromosome loci changing allele frequency in the spawning population. The listed potential effects are complex and difficult to quantify.

Kodiak Refuge largely depends on the Department to maintain cyclical salmon populations within historic levels and maintain the genetic integrity of spawning populations. Thus, there is a nexus between the Refuge and the proposed activity. Recent literature by Schindler et al. (2010) describes the importance of maintaining the whole portfolio of spawning stocks to provide the maximum resilience to changing environmental conditions, "the portfolio effect". The research



demonstrated that maintaining the whole portfolio reduced annual variation in salmon returns and commercial fishing closures. As budgets become more limited, the Refuge would like to see the Department's fisheries budget used effectively.

While the Refuge has not opposed small experimental culling programs in the past by the Department, such as the one that occurred at the lower Dog Salmon weir, the scope and location of this Proposal places consideration of the activity in a different category, a new refuge use. Our additional comments to the Board are meant to clarify the Refuge's position and perspective regarding our mandates for administrative action when a new Refuge use is proposed.

We reiterate that the current lease does not authorize a culling program at Frazer fish pass. To clarify, the main purpose of a land lease from the U.S. Fish and Wildlife Service (USFWS) is to authorize occupancy. At Frazer fish pass, the lease gives the Department the right to occupy the site to place the weir and facilities need for the operation of the fish weir. Section 5 of the lease provides for a base "... for research and management activities ... for the purpose of operating the weir. Whether couched as a management or research activity, the proposal to cull Sockeye Salmon is not for the purpose of operating or managing the weir.

The Memorandum provides the Refuge's Letter (dated 12/2/2016; here after the "Letter") to the Regional Finfish Research Supervisor (see attachment). The Letter was in response to the timely briefing on the Department's deliberation regarding Proposal #58. The administrative process is listed below:

1. A request for authorization and detailed operational plan would need to be submitted to the Refuge;
2. An Appropriate Use Determination would need to be completed;
3. If found "Appropriate", a Compatibility Determination (CD) would need to be completed; and
4. Either in conjunction with the CD or separately, an appropriate National Environmental Policy Act (NEPA) analysis and decision document would be needed to be completed.
5. Issuance of a Special Use Permit, potentially, depending on the outcome of the above.

Listed items 3 and 4 above require public comment periods of at least two weeks to one month (may be concurrent).



The NEPA analysis would require the consideration of reasonable alternatives. The Refuge is obligated to consider effects broader than just fish management (i.e., public use, bear behavior, system ecology) as well as alternate locations (i.e., lower Dog Salmon River weir). As listed in the Letter, preliminary in-house scoping for a NEPA analysis identified the following potential issues of concern:

- Bear behavior (attraction) at the Frazer Fish Pass as a result of the culling operation
- Bear behavior (attraction) to the access trail and lake access site due to carcass transportation
- Bear behavior changes in response to the deposition of carcasses in Frazer Lake
- Bear behavior (attraction) at Frazer Fish Pass weir as result of unintended depositions from culling operation.
- Number and location of bear/human interactions
- Loss of production of Sockeye Salmon from under-seeding annual egg production
- Ecology of Frazer Lake as impacted by carcass deposition
- Impact to the bear-viewing public (700-900 people annually) and commercial operators supporting wildlife viewing priority public uses for the Refuge
- Loss of the genetic diversity and structure of the run
- Impact to recreational fishers and cabin users at Frazer Lake and Dog Salmon Creek

Further scoping with partners and the public may increase or decrease the number of issues of concern.

In conclusion, the Refuge must consider the proposed activity from a biological, public use, and administrative perspective. From a biological perspective, it appears that the project will not be effective in achieving the stated goal of reducing the jack component and increasing the harvestable surplus, and the activity could potentially eliminate other needed management projects on Kodiak Refuge (e.g., We understand that funding for the lower Dog Salmon River weir may be in questions.) In addition, potential consequences to the ecology cannot be fully known or quantified. As described the proposed use may affect the bear-viewing visitors. From an administrative perspective, the current lease does not authorize the activity, and the use would be considered a “new use” triggering an administrative process.

Literature cited:

Schindler, D., R. Hilborn, B. Chasco, C. Boatright, T. Quinn, L. Rogers, and M. Webster. 2010. Population diversity and the portfolio effect in an exploited species. *Nature* Vol. 465, No. 3.



Respectfully,

Tevis Underwood

Tevis Underwood
Acting Refuge Manager
Kodiak National Wildlife Refuge



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Kodiak National Wildlife Refuge
1390 Buskin River Road
Kodiak, Alaska 99615-0323
(907) 487-2600



IN REPLY REFER TO
Underwood

December 2, 2016

Kevin Schaberg, Regional Finfish Research Supervisor
Alaska Department of Fish and Game
Division of Commercial Fisheries, Region IV
351 Research Court
Kodiak, Alaska 99615-7400

Dear Kevin,

Thank you for the briefing you provided on Friday, November 18, regarding the Alaska Department of Fish and Game's (Department) consideration of Proposal #58, ***Alitak District Salmon Management Plan***, currently before the Alaska Board of Fish. This proposal seeks a program to "Limit escapement of jack Sockeye Salmon into Frazer Lake to no more than 15 percent of total Frazer Lake Sockeye Salmon escapement." Further, the proposal suggests that "A system could be devised to trap and cull any excess jacks to be used as added nutrients into the lake should an overage occur." The program is proposed for a period of 4 years (until 2020) and requires reporting and a full evaluation at the conclusion of the program.

We understand from your briefing that, in response to this Proposal, the Department is considering the culling of jack Sockeye Salmon at the Frazer fish pass, transportation of the carcasses to Frazer Lake along the existing public access trail, and then depositing the carcasses in Frazer Lake. We followed through on our promised to initiate an internal review. Our intent is not criticism of the proposal; rather, we are fulfilling our requirement to consider all aspects of refuge, resource, and public-use management on the Refuge.

To begin, we reviewed the existing 50-year lease agreement (dated May 25th 1995) for weir operations at Frazer Lake (including the fish pass and other sites) signed by the Department and the U.S. Fish and Wildlife Service (Service). Section 5 of this lease, "Use Rights", is particularly pertinent to this proposal, and we concluded that the lease agreement does not authorize the proposed activities in and around Frazer Lake.



We then reviewed the Proposal in reference to national policies on appropriate use and compatible use, applied to all refuges in the National Wildlife Refuge System (NWRS). Based on the information in your briefing, the proposed amount, location, and disposal of culled salmon would be considered a new use. Refuge “uses” are defined in 603 FW2, which requires us to review new and existing uses within units of the NWRS. We understand that the activities in the proposal would be a “Specialized Use” described in 603 FW1 Section 1.10D of that policy. These are considered on a case by case basis. The Refuge must consider the potential effects of these proposed activities (“use”) within the Refuge before they can be allowed. National policies for Appropriate Use and Compatibility were developed under statutory authority of the National Wildlife Refuge Administration Act of 1966 as amended by the Refuge Improvement Act of 1997 and others, specifically policies 603 FW 1 and 603 FW 2. Appropriate uses must meet specific criteria (603 FW 1, section 1.11). If the criteria are met, the use is appropriate, and then separately, compatibility is determined through analysis. All uses allowed must be determined to be compatible. A “compatible use” is defined as follows:

Compatible use: A proposed or existing wildlife-dependent recreational use or any other use of a national wildlife refuge that, based on sound professional judgment, will not materially interfere with or detract from the fulfillment of the NWRS mission or the purposes of the national wildlife refuge.

Some concerns we have identified based on our preliminary assessment of the information provided in your briefing include these potential impacts:

- Bear behavior (attraction) at the Frazer Fish Pass as a result of the culling operation
- Bear behavior (attraction) to the access trail and lake access site due to carcass transportation
- Bear behavior changes in response to the deposition of carcasses in Frazer Lake
- Number and location of bear/human interactions
- Loss of production of Sockeye Salmon from under-seeding annual egg production,
- Ecology of Frazer Lake as impacted by carcass deposition
- Impact to the bear-viewing public and commercial operators supporting wildlife viewing, priority public uses for the Refuge
- Loss of the genetic diversity and structure of the run
- Impact to recreational fishers and cabin users at Frazer Lake and Dog Salmon Creek

Some concerns are location specific, i.e. to the Frazer fish pass. Others may or may not be “significant,” but that determination would be made after appropriate analysis. A more detailed operations plan would be necessary to fully analyze some of these impacts.

We determined that it would take approximately 45 days for Refuge staff to complete an Appropriate Use analysis and Compatibility Determination, including a required public comment period for compatibility. If the activities are found to be appropriate and compatible, and the



Department wanted to conduct the activities, the Service would also need to conduct an analysis under the National Environmental Policy Act before the activities could begin.

If you have further questions on our concerns or additional details on the appropriate use and compatibility processes, or if we need to discuss the proposal further, please contact Tevis Underwood, Deputy Refuge Manager at 487-2600. Thank you again for your proactive communication.

Respectfully,

A handwritten signature in blue ink that reads "Tevis Underwood".

for

Anne Marie La Rosa
Kodiak National Wildlife Refuge Manager

Cc: Nick Sagalkin, Regional Supervisor



Opposition to Changes in the Cape Igvak Management Plan

Resolution 2016-001

Dated: December 27, 2016

A RESOLUTION OPPOSING CHANGES TO THE CAPE IGVAK MANAGEMENT PLAN FOR COMMERCIAL FISHING IN THE CAPE IGVAK SECTION OF THE KODIAK MANAGEMENT AREA.

- WHEREAS, before limited entry, in the late 1960s, Kodiak and Chignik based fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries; and
- WHEREAS, the Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area; and
- WHEREAS, the Alaska Board of Fisheries, in 1978, established the Cape Igvak fisheries management plan; and
- WHEREAS, the Cape Igvak management plan balanced the equities between Kodiak fishermen and Chignik fishermen by limiting Kodiak fishermen's Cape Igvak Catches to 15% of the total Chignik area sockeye salmon catch but also insuring that Chignik area fishermen harvest a minimum of 600,000 sockeye salmon before the Cape Igvak fishery is open for fishing; and
- WHEREAS, the 36 year average allocation to Kodiak fishermen fishing under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch; and
- WHEREAS, the catch of Chignik bound sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the Cape Igvak Management plan has been in place; and
- WHEREAS, Chignik biological escapement goals have been met throughout the time that the Cape Igvak management plan has been in place; and
- WHEREAS, the Cape Igvak management plan does not threaten Chignik area biological escapement goals; and
- WHEREAS, the characteristics and number of participants in the fishery have not changed; and
- WHEREAS, Chignik fishermen continue to have larger average salmon fishing earnings



than Kodiak fishermen and enjoy substantially higher salmon permit values than Kodiak fishermen; and

WHEREAS, both Kodiak fishermen and Chignik fishermen continue to enjoy the same alternative fishery resources; and

WHEREAS, Kodiak fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery; and


WHEREAS a far larger percentage of Kodiak salmon permit holders continue to reside in the Kodiak area and Alaska than do Chignik area salmon permit holders residing in Chignik; and

WHEREAS, there are no changes in circumstances, either biological, economic or regulatory that would justify changes to the Cape Igvak management plan; and

WHEREAS, the following tribes and Alaska Native Corporations endorse this resolution:

The Native Village of Ouzinkie
Ouzinkie Native Corporation
Koniag, Inc.

THEREFORE BE IT RESOLVED, that the Alaska Board of Fisheries NOT make changes to the Cape Igvak management plan.



Tom Panamaroff, Regional &
Legislative Affairs Executive
Koniag, Inc.



**Support for the Establishment of a Limited Duration
Subsistence Salmon Harvest Area in Ouzinkie Harbor
Resolution 2016-002
Dated: December 27, 2016**

A RESOLUTION SUPPORTING THE ESTABLISHMENT OF A LIMITED DURATION SUBSISTENCE SALMON HARVEST AREA IN OUZINKIE HARBOR.

WHEREAS, Ouzinkie is a small Alutiiq village that continues to prioritize subsistence harvests and the subsistence way of life; and

WHEREAS, The Ouzinkie Native Corporation has cooperated with the Kodiak Regional Aquaculture Association by providing access to the water source for the Kitoi Bay Hatchery; and

WHEREAS, the Kodiak Regional Aquaculture Association in conjunction with the community of Ouzinkie developed a sockeye imprinting project in Ouzinkie harbor so that sockeye salmon return to the harbor for subsistence harvest; and

WHEREAS, the community of Ouzinkie has supported the project by purchasing the rearing pens and feeding the sockeye salmon fry during the imprinting process; and

WHEREAS, the first sockeye salmon returned to the Ouzinkie harbor in 2015 and the community of Ouzinkie greatly enjoyed and utilized the subsistence harvest of sockeye salmon in proximity to the community; and

WHEREAS, during the 2016 return of sockeye to Ouzinkie harbor, a commercial seine vessel entered the area and “scooped up” the sockeye intended for Ouzinkie subsistence use right in front of the nets set for catching subsistence fish; and

WHEREAS, Kodiak purse seine vessels have not historically fished in the Ouzinkie harbor and there is ample opportunity for commercial salmon fishermen to catch sockeye returning to Ouzinkie as “common property” fish prior to the fish reaching Ouzinkie harbor; and

WHEREAS, a limited duration exclusive subsistence fishery in the Ouzinkie harbor would provide for the subsistence needs of Ouzinkie residents and other subsistence fishermen; and

WHEREAS, the following tribes, Native Corporations and municipal governments endorse this resolution:

The Native Village of Ouzinkie
Ouzinkie Native Corporation



City of Ouzinkie
Koniag, Inc.

THEREFORE BE IT RESOLVED, that the Alaska Board of Fisheries establish an exclusive subsistence fishery in the Ouzinkie Harbor area from July 1 through August 15 of each year.

Tom Panamareff, Regional &
Legislative Affairs Executive
Koniag, Inc.



Submitted By
Leif Gustafson
Submitted On
12/27/2016 1:41:41 PM
Affiliation

I would like to express my opposition to articles 51-56. I am entering my first season as the owner operator of a Kodiak salmon vessel. My success or failure--the livelihood of my family, will depend on my ability to cultivate salmon in the area allocated by ownership of a Kodiak seine permit. Please, be considerate of means and continue to allow Kodiak salmon fisherman to pursue our way of life



ATTN: BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56, 59, 62, 63, and 65

Dear Chairman Jensen and Board Members,

My name is Matt Alward and I started fishing in the Kodiak salmon seine fishery as a deckhand in 1995 and bought a boat in 2008 and have been participating in the fishery since. I oppose proposals 51 through 56 seeking to make allocative changes to the Cape Igvak Salmon Management Plan 5AAC 18.360, proposal 59 that would implement a mandatory minimum commercial salmon fishery closure of 63 consecutive hours during every week in both the Westside and Alitak districts, proposals 62 and 63 that propose to create closed waters around the terminus of the Ayakulik river, and proposal 65 that would require seine gear modifications.

Long before limited entry came into existence Kodiak fishermen had been fishing in the Cape Igvak section. When the State limited fisheries people had to make a choice where to fish, and many picked Kodiak because of the diversity of the region that included Igvak. Five years later, in 1978, the Cape Igvak Salmon Management Plan was implemented and has only had two very slight changes since. It is one of the oldest management plans in the state and has served both areas well. From 1978 through 2016 Chignik has averaged 37.5% higher earnings than Kodiak fishermen while fishing a shorter season. Given that there have been no new changes to either fisheries, and Chignik fishermen already earn more than Kodiak fishermen on average, I do not see any justification to change an allocative management plan that has been in effect for 38 years. I would like to point out that the plan calls for managing for an Igvak harvest that will approach as near as possible 15% of the total Chignik sockeye salmon catch and the 38 year average is 12% with Kodiak only going over 15% 8 years. This shows that Fish and Game has done an excellent job managing the Cape Igvak fishery and there is no reason to change the plan for management reasons. Chignik has also met escapement goals the years that Kodiak has fished in Igvak so there is no biological reason to close Igvak. Since there are no financial, managerial, or biological reasons to change the Cape Igvak Management Plan and these proposals are just one user group wanting more fish at the expense of another group, I urge you to not pass proposals 51, 53, 54, 55, and 56.



Proposal 52 would make it mandatory to report into and out of Cape Igvak section. The proposer is implying that there is incentive to take fish caught in Igvak across to be delivered on Kodiak Island and misreport on our fish tickets where the fish were caught. It sounds to me like I'm being accused of breaking the law without any evidence, and I believe that it would be a mistake to pass a proposal based on unsubstantiated allegations. My cannery is located on the West side of Kodiak Island and there has been times in the past when the cannery couldn't get a tender over to Igvak in time for a closure and I've brought fish back to the island, but they were always reported as caught in Cape Igvak section.

Proposal 59 would require a 63 hour closure every week in the Westside and Alitak sections for conservation of Alitak bound sockeye salmon. The Westside section is managed for local stocks and to have a mandatory closure to protect Alitak stocks could cause over escapement of Karluk bound fish. According to the "Genetic Stock Composition of Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014-2016" tables 6, 10, 14, 18, 22, and 26, the yearly average of Upper Station and Akalura bound fish caught in the Westside section was .0122% of the total Westside harvest. To risk over escaping Karluk for such a low percentage of Alitak fish would be a crime in my opinion and I ask that you do not pass proposal 59.

The Inner Ayakulik Section is managed on an emergency order basis to control over escapement of sockeye or pink salmon into the Ayakulik River. Having a short opening up to the stream terminus is an effective way to control over abundance of fish and to take that away would require more fishing time further away from the river mouth to achieve the same goal. Extended fishing time in outer areas would result in more chance of catching King salmon which would result in the opposite effect than what the proposer intends. Setting up a 1000 or 500 yard closed area would also create an enforcement issue. It's very hard to define the exact radius around a river mouth and it would be very difficult for enforcement to determine if someone went into closed waters. I would like to point out that by July 15th 97% of the Ayakulik king salmon run is already past the weir and proposal 63 would close the area for the entire season. I would also like to point out that from 2005 through 2015 the commercial fleet has harvested a total of 144 king salmon in Inner Ayakulik (pg. 88 staff comments) and in the same time according to log book data the sport fishery has harvested 512 king salmon and caught and released 7295 (pg. 89 staff comments). The commercial fleet is also required to return king salmon over 28 inches to the water unharmed so even if we did have king salmon harvest they go back in the water. For these reasons I ask that you do not pass proposals 62 and 63.

Proposal 65 states that there should be 4 ½" mesh in purse seines until July 15th to allow juvenile Chinook and Chum salmon to pass through the net. I would like to point out that 4 ½" mesh size is close to what is used in a pink salmon gillnet and I believe would gill juvenile salmon causing more harm than good. As someone who owns a business that repairs and builds purse seines I would like to point out



that the cost of new web for a two strip seine would be approximately \$4,500.00 without the labor to remove and replace the old web.

In closing I want to thank you for the opportunity to comment on the Kodiak finfish meeting proposals.

Sincerely,

Matt Alward

Owner-Alward Fisheries LLC



Submitted By
Michael Macaluso
Submitted On
12/27/2016 2:35:21 PM
Affiliation

Proposals; 51,53,54,55,56

Good Day Board of Fish Members,

My name is Michael Macaluso. I am a Chignik Salmon Seine permit holder and Proposal 55, relating to the Cape Igvak salmon management plan, is in my name. I strongly support proposals 51, 53, 54, and 56. Upon further consideration of historical data and fishing trends I currently believe that a compromise needs to be considered on the Cape Igvak Management Plan. While Proposal 55 has merit, it would eliminate a long standing management plan. The plan has evolved and is outdated from its original conception. It needs to be changed to more accurately affect current conditions.

My desire as a Chignik fisherman is to establish accountability and understanding to those who intercept the sockeye that come back to their native spawning grounds in Chignik. Chignik is the most heavily intercepted fishery in the state. As it stands now, by regulation 22.6% of Chignik fish are allocated to adjoining areas (7.6% in Area M and 15% in Kodiak). The Dolgoi Island Management Area can bring the total Chignik interception to as high as 50%. As a comparison Bristol Bay, the largest sockeye run in the world, has a historical interception of 8%. Ultimately, what this debate comes down to is if other areas have the right to intercept other areas' salmon when the amount of fish is proportionally proven to belong in other areas as well as the financial impact made to the neighboring fishing area which is adversely affected. Under the Alaska's Salmon Sustainability Fisheries Policy areas are accountable for salmon they intercept regardless if its in another area.

In financial terms the Kodiak fleet, specifically those that fish in the Igvak area, do not need to take a piece of the "Chignik pie" any longer. If one looks at the CFEC quartile reports (see attached) of both Chignik and Kodiak over the last 10 years one can see that the top quartiles in each fishery are drastically different. In 2015 the top earners in Chignik made \$250,000 while in Kodiak the top earners made \$496,000. In 2014 the top earners in Chignik averaged \$294,000 while in Kodiak the top earners averaged \$545,000. This trend continues over the historical data.

I use the top quartiles as indicative of trends in the two areas for two reasons.

One- The Kodiak vessels that fish in the Cape Igvak area tend to be the top earners. Over the last ten years approximately 30% of the Kodiak fleet fishes in the Cape Igvak area in any given season. This area is not used by the average Kodiak fisherman but more for the top earners.

Two- The average vessel compared to a top quartile vessel is much greater in Kodiak than in Chignik. The Chignik seine fishery has primarily only Chignik sockeye as its income and the ability to utilize interception opportunities like Kodiak do not exist which makes Chignik vessels gross closer together. The Kodiak's fleet opportunity has grown over the years with hatchery production and increasing salmon returns around the island and mainland.

As a Chignik fisherman that was involved in the last Board of Fish cycle pertaining to Chignik and Area M, I found that compromise was needed to make progress. I believe there is a need to be flexible and change with changing conditions with the rapidly changing ocean and atmospheric conditions. I would like all fisherman involved in the state's fisheries to make a living off the amazing resource that is Alaska salmon. I believe that one of the functions of the Board of Fish and its revolving meetings is meant to adapt and confront changes as they arise in each fishery over time to help make economic sustainability possible for all areas. I appreciate your thoughtfulness and consideration to these proposals.

Michael Macaluso

S 01K — SALMON, PURSE SEINE, KODIAK						
Year: 2015						
Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	16	8.89	\$7,939,185	25.46	\$496,199	actual cumulative
	16	8.89	\$7,939,185	25.46	\$496,199	
2	25	13.89	\$7,634,602	24.49	\$305,384	actual cumulative
	41	22.78	\$15,573,787	49.95	\$379,848	
3	42	23.33	\$7,822,866	25.09	\$186,259	actual cumulative
	83	46.11	\$23,396,653	75.04	\$281,887	
4	97	53.89	\$7,781,053	24.96	\$80,217	actual

(low)	180	100.00	\$31,177,706	100.00	\$173,209	cumulative
Total pounds represented in this table: 112,677,857						



S 01K — SALMON, PURSE SEINE, KODIAK						
Year: 2014						
Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	16	8.70	\$8,732,906	24.90	\$545,807	actual
(high)	16	8.70	\$8,732,906	24.90	\$545,807	cumulative
2	27	14.67	\$8,873,645	25.31	\$328,654	actual
	43	23.37	\$17,606,551	50.21	\$409,455	cumulative
3	39	21.20	\$8,661,421	24.70	\$222,088	actual
	82	44.57	\$26,267,972	74.91	\$320,341	cumulative
4	102	55.43	\$8,797,547	25.09	\$86,250	actual
(low)	184	100.00	\$35,065,519	100.00	\$190,573	cumulative
Total pounds represented in this table: 50,729,053						

S 01K — SALMON, PURSE SEINE, KODIAK						
Year: 2013						
Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	19	11.38	\$14,169,472	25.48	\$745,762	actual
(high)	19	11.38	\$14,169,472	25.48	\$745,762	cumulative
2	27	16.17	\$13,578,601	24.41	\$502,911	actual
	46	27.54	\$27,748,073	49.89	\$603,219	cumulative
3	41	24.55	\$14,073,141	25.30	\$343,247	actual
	87	52.10	\$41,821,213	75.19	\$480,704	cumulative
4	80	47.90	\$13,797,848	24.81	\$172,473	actual
(low)	167	100.00	\$55,619,062	100.00	\$333,048	cumulative
Total pounds represented in this table: 98,321,205						

S 01K — SALMON, PURSE SEINE, KODIAK						
Year: 2012						
Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	16	9.64	\$9,959,828	24.50	\$622,489	actual
(high)	16	9.64	\$9,959,828	24.50	\$622,489	cumulative
2	25	15.06	\$10,244,135	25.20	\$409,765	actual
	41	24.70	\$20,203,964	49.69	\$492,780	cumulative
3	38	22.89	\$10,198,631	25.08	\$268,385	actual



	79	47.59	\$30,402,595	74.78	\$384,843	cumulative
4	87	52.41	\$10,255,317	25.22	\$117,877	actual
(low)	166	100.00	\$40,657,912	100.00	\$244,927	cumulative
Total pounds represented in this table: 64,874,852						

S 01K — SALMON, PURSE SEINE, KODIAK**Year: 2011**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	15	8.62	\$10,874,031	24.94	\$724,935	actual
(high)	15	8.62	\$10,874,031	24.94	\$724,935	cumulative
2	24	13.79	\$10,895,695	24.99	\$453,987	actual
	39	22.41	\$21,769,726	49.93	\$558,198	cumulative
3	39	22.41	\$10,895,326	24.99	\$279,367	actual
	78	44.83	\$32,665,052	74.91	\$418,783	cumulative
4	96	55.17	\$10,938,589	25.09	\$113,944	actual
(low)	174	100.00	\$43,603,641	100.00	\$250,596	cumulative
Total pounds represented in this table: 63,618,464						

S 01K — SALMON, PURSE SEINE, KODIAK**Year: 2010**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	16	10.39	\$5,021,626	25.25	\$313,852	actual
(high)	16	10.39	\$5,021,626	25.25	\$313,852	cumulative
2	22	14.29	\$4,934,161	24.81	\$224,280	actual
	38	24.68	\$9,955,786	50.06	\$261,994	cumulative
3	35	22.73	\$4,991,007	25.10	\$142,600	actual
	73	47.40	\$14,946,793	75.16	\$204,751	cumulative
4	81	52.60	\$4,940,292	24.84	\$60,991	actual
(low)	154	100.00	\$19,887,085	100.00	\$129,137	cumulative
Total pounds represented in this table: 36,760,460						

S 01K — SALMON, PURSE SEINE, KODIAK**Year: 2009**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	16	10.19	\$7,317,132	24.43	\$457,321	actual
(high)	16	10.19	\$7,317,132	24.43	\$457,321	cumulative
2	25	15.92	\$7,629,607	25.47	\$305,184	actual



	41	26.11	\$14,946,739	49.90	\$364,555	cumulative
3	37	23.57	\$7,456,186	24.89	\$201,519	actual
	78	49.68	\$22,402,926	74.79	\$287,217	cumulative
4 (low)	79	50.32	\$7,551,920	25.21	\$95,594	actual
	157	100.00	\$29,954,846	100.00	\$190,795	cumulative
Total pounds represented in this table: 92,642,064						

S 01K — SALMON, PURSE SEINE, KODIAK

Year: 2008

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	13	10.16	\$5,388,367	25.25	\$414,490	actual
	13	10.16	\$5,388,367	25.25	\$414,490	cumulative
2	21	16.41	\$5,254,998	24.62	\$250,238	actual
	34	26.56	\$10,643,366	49.87	\$313,040	cumulative
3	31	24.22	\$5,406,340	25.33	\$174,398	actual
	65	50.78	\$16,049,706	75.20	\$246,919	cumulative
4 (low)	63	49.22	\$5,294,162	24.80	\$84,034	actual
	128	100.00	\$21,343,868	100.00	\$166,749	cumulative
Total pounds represented in this table: 36,279,552						

S 01K — SALMON, PURSE SEINE, KODIAK

Year: 2007

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	17	12.14	\$6,097,451	25.03	\$358,674	actual
	17	12.14	\$6,097,451	25.03	\$358,674	cumulative
2	24	17.14	\$6,123,657	25.14	\$255,152	actual
	41	29.29	\$12,221,109	50.17	\$298,076	cumulative
3	30	21.43	\$6,058,082	24.87	\$201,936	actual
	71	50.71	\$18,279,190	75.04	\$257,453	cumulative
4 (low)	69	49.29	\$6,078,590	24.96	\$88,096	actual
	140	100.00	\$24,357,780	100.00	\$173,984	cumulative
Total pounds represented in this table: 88,288,785						

S 01K — SALMON, PURSE SEINE, KODIAK

Year: 2006

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1	14	10.77	\$6,159,268	24.74	\$439,948	actual



(high)	14	10.77	\$6,159,268	24.74	\$439,948	cumulative
2	22	16.92	\$6,363,965	25.56	\$289,271	actual
	36	27.69	\$12,523,233	50.30	\$347,868	cumulative
3	29	22.31	\$6,063,425	24.36	\$209,084	actual
	65	50.00	\$18,586,658	74.66	\$285,949	cumulative
4 (low)	65	50.00	\$6,309,007	25.34	\$97,062	actual
	130	100.00	\$24,895,666	100.00	\$191,505	cumulative
Total pounds represented in this table: 111,940,643						

S 01K — SALMON, PURSE SEINE, KODIAK**Year: 2005**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	17	12.59	\$4,848,629	25.20	\$285,213	actual
	17	12.59	\$4,848,629	25.20	\$285,213	cumulative
2	23	17.04	\$4,728,884	24.57	\$205,604	actual
	40	29.63	\$9,577,513	49.77	\$239,438	cumulative
3	30	22.22	\$4,824,929	25.07	\$160,831	actual
	70	51.85	\$14,402,442	74.85	\$205,749	cumulative
4 (low)	65	48.15	\$4,840,319	25.15	\$74,466	actual
	135	100.00	\$19,242,761	100.00	\$142,539	cumulative
Total pounds represented in this table: 101,108,669						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2015**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	9	12.68	\$2,258,217	25.22	\$250,913	actual
	9	12.68	\$2,258,217	25.22	\$250,913	cumulative
2	11	15.49	\$2,155,942	24.07	\$195,995	actual
	20	28.17	\$4,414,159	49.29	\$220,708	cumulative
3	18	25.35	\$2,341,213	26.14	\$130,067	actual
	38	53.52	\$6,755,372	75.43	\$177,773	cumulative
4 (low)	33	46.48	\$2,200,447	24.57	\$66,680	actual
	71	100.00	\$8,955,818	100.00	\$126,138	cumulative
Total pounds represented in this table: 15,555,113						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2014**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	7	10.00	\$2,060,531	25.97	\$294,362	actual
	7	10.00	\$2,060,531	25.97	\$294,362	cumulative



2	10 17	14.29 24.29	\$1,947,165 \$4,007,696	24.54 50.50	\$194,716 \$235,747	actual cumulative
3	16 33	22.86 47.14	\$1,991,243 \$5,998,939	25.09 75.60	\$124,453 \$181,786	actual cumulative
4 (low)	37 70	52.86 100.00	\$1,936,665 \$7,935,605	24.40 100.00	\$52,342 \$113,366	actual cumulative
Total pounds represented in this table: 6,863,049						

S 01L --- SALMON, PURSE SEINE, CHIGNIK**Year: 2013**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	12	15.79	\$8,109,426	25.58	\$675,786	actual
	12	15.79	\$8,109,426	25.58	\$675,786	cumulative
2	14	18.42	\$7,625,697	24.06	\$544,693	actual
	26	34.21	\$15,735,123	49.64	\$605,197	cumulative
3	18	23.68	\$8,134,358	25.66	\$451,909	actual
	44	57.89	\$23,869,481	75.30	\$542,488	cumulative
4 (low)	32	42.11	\$7,829,413	24.70	\$244,669	actual
	76	100.00	\$31,698,894	100.00	\$417,091	cumulative
Total pounds represented in this table: 21,128,489						

S 01L --- SALMON, PURSE SEINE, CHIGNIK**Year: 2012**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	10	14.49	\$3,603,572	26.03	\$360,357	actual
	10	14.49	\$3,603,572	26.03	\$360,357	cumulative
2	12	17.39	\$3,352,245	24.22	\$279,354	actual
	22	31.88	\$6,955,817	50.25	\$316,173	cumulative
3	17	24.64	\$3,491,548	25.22	\$205,385	actual
	39	56.52	\$10,447,365	75.47	\$267,881	cumulative
4 (low)	30	43.48	\$3,395,628	24.53	\$113,188	actual
	69	100.00	\$13,842,993	100.00	\$200,623	cumulative
Total pounds represented in this table: 14,507,788						

S 01L --- SALMON, PURSE SEINE, CHIGNIK**Year: 2011**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	



1 (high)	8 8	12.50 12.50	\$6,500,399 \$6,500,399	25.45 25.45	\$812,550 \$812,550	actual cumulative
2	10 18	15.63 28.13	\$6,155,900 \$12,656,298	24.10 49.55	\$615,590 \$703,128	actual cumulative
3	15 33	23.44 51.56	\$6,626,057 \$19,282,356	25.94 75.49	\$441,737 \$584,314	actual cumulative
4 (low)	31 64	48.44 100.00	\$6,259,700 \$25,542,055	24.51 100.00	\$201,926 \$399,095	actual cumulative
Total pounds represented in this table: 23,165,775						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2010**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	9 9	13.85 13.85	\$3,222,857 \$3,222,857	25.76 25.76	\$358,095 \$358,095	actual cumulative
2	11 20	16.92 30.77	\$2,951,081 \$6,173,938	23.59 49.35	\$268,280 \$308,697	actual cumulative
3	16 36	24.62 55.38	\$3,154,629 \$9,328,567	25.22 74.57	\$197,164 \$259,127	actual cumulative
4 (low)	29 65	44.62 100.00	\$3,181,085 \$12,509,651	25.43 100.00	\$109,693 \$192,456	actual cumulative
Total pounds represented in this table: 16,240,499						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2009**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	8 8	14.55 14.55	\$2,554,927 \$2,554,927	25.73 25.73	\$319,366 \$319,366	actual cumulative
2	9 17	16.36 30.91	\$2,320,135 \$4,875,063	23.36 49.09	\$257,793 \$286,768	actual cumulative
3	13 30	23.64 54.55	\$2,519,212 \$7,394,275	25.37 74.46	\$193,786 \$246,476	actual cumulative
4 (low)	25 55	45.45 100.00	\$2,536,369 \$9,930,644	25.54 100.00	\$101,455 \$180,557	actual cumulative
Total pounds represented in this table: 15,431,497						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2008**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	



Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	7	12.96	\$2,099,690	24.13	\$299,956	actual
	7	12.96	\$2,099,690	24.13	\$299,956	cumulative
2	9	16.67	\$2,150,514	24.71	\$238,946	actual
	16	29.63	\$4,250,204	48.84	\$265,638	cumulative
3	13	24.07	\$2,223,995	25.55	\$171,077	actual
	29	53.70	\$6,474,199	74.39	\$223,248	cumulative
4 (low)	25	46.30	\$2,228,718	25.61	\$89,149	actual
	54	100.00	\$8,702,917	100.00	\$161,165	cumulative
Total pounds represented in this table: 15,920,947						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2007**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	6	10.91	\$1,499,808	25.87	\$249,968	actual
	6	10.91	\$1,499,808	25.87	\$249,968	cumulative
2	8	14.55	\$1,429,182	24.65	\$178,648	actual
	14	25.45	\$2,928,990	50.51	\$209,214	cumulative
3	13	23.64	\$1,451,167	25.03	\$111,628	actual
	27	49.09	\$4,380,157	75.54	\$162,228	cumulative
4 (low)	28	50.91	\$1,418,339	24.46	\$50,655	actual
	55	100.00	\$5,798,496	100.00	\$105,427	cumulative
Total pounds represented in this table: 14,368,708						

S 01L — SALMON, PURSE SEINE, CHIGNIK**Year: 2006**

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	6	12.50	\$1,262,222	26.49	\$210,370	actual
	6	12.50	\$1,262,222	26.49	\$210,370	cumulative
2	8	16.67	\$1,135,758	23.84	\$141,970	actual
	14	29.17	\$2,397,980	50.33	\$171,284	cumulative
3	11	22.92	\$1,132,601	23.77	\$102,964	actual
	25	52.08	\$3,530,581	74.10	\$141,223	cumulative
4 (low)	23	47.92	\$1,234,148	25.90	\$53,659	actual
	48	100.00	\$4,764,730	100.00	\$99,265	cumulative
Total pounds represented in this table: 7,881,181						

S 01L — SALMON, PURSE SEINE, CHIGNIK

Quartile	Permits		Estimated Gross Earnings			
	Number	Percent	Total	Percent	Average	
1 (high)	7	7.22	\$1,645,251	24.82	\$235,036	actual cumulative
	7	7.22	\$1,645,251	24.82	\$235,036	
2	11	11.34	\$1,657,516	25.01	\$150,683	actual cumulative
	18	18.56	\$3,302,766	49.83	\$183,487	
3	21	21.65	\$1,685,570	25.43	\$80,265	actual cumulative
	39	40.21	\$4,988,337	75.26	\$127,906	
4 (low)	58	59.79	\$1,639,433	24.74	\$28,266	actual cumulative
	97	100.00	\$6,627,770	100.00	\$68,328	
Total pounds represented in this table: 7,921,590						



Submitted By

Mikal Mathisen

Submitted On

12/27/2016 10:44:27 AM

Affiliation

Crab boat captain

Phone

206-842-5154

Email

mjmmathisen@msn.com

Address

11753 Sunrise Dr NE

Bainbridge Island, Washington 98110

I support Proposal 278. The female threshold of the Bering Sea Tanner fishery goes back to 1975. In the last 41+ years the fishery and the Bering Sea has changed quite a bit. It would be nice to modernize the regulation to a somewhat nearer term history. In my own and fellow fisherman's personal experience there is a lot of crab out there that is not showing up on the summer survey. Under the existing quota style fishery we can be exact in our catch, so that even small quotas can and should be harvested.



December 27, 2016

Board of Fisheries,

My name is Minnie Skonberg and I am now the owner of the F/V Amy Rae since my husband Roy Skonberg passed away 14 years ago. I have had a tough time making ends meet since then, not only because of his passing, but because of the price of fish and the upkeep of my boat, which I had to take a loan out from the only processor here, which is Trident. I haven't been able to pay them back because of the low fish price and because we haven't had lucrative fishing runs in the past few years.

I live in Chignik all year since I was a child and my family has always relied on fishing for our livelihood. I am barely able to pay for fuel and groceries and because I owe Trident I have been unable to fish my boat for the past two years.

I am in support of Proposals 51 - 56 that are being presented at the meetings and would like you to consider the hardships that we have encountered in our Community. This has affected all of my family, children, grandchildren and relatives that live here, as well as the rest of the Community. There are no jobs here because the City is also having difficulty with no processing taxes from the Processors. This makes it hard to rely on fishing to make a living and there are really no other options, because there are no jobs here.

Thank you,

A handwritten signature in cursive script that reads "Minnie Skonberg".

Minnie Skonberg

F/V Amy Rae



Submitted By
Nathaniel Rose
Submitted On
12/27/2016 11:13:02 PM
Affiliation
F/V Historian

Phone
907-654-4323
Email
naterose03@gmail.com
Address
3011 Spruce Cape Road
Kodiak, Alaska 99615

ATTN: BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 51 through 56

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. I am a Kodiak Salmon Seine permit holder and have actively fished my permit aboard my family owned boat the Historian, a 41'x 13' fiberglass seiner. During the offseason, I am a teacher at the Kodiak High School. The Cape Igvak fishery has become an invaluable resource for spreading Kodiak's large fleet out, and for diversifying the targeted salmon species in order to supplement poor pink salmon returns. As a Kodiak community member, the economic effects of poor salmon seasons are felt in every aspect of our town, and the surrounding native villages. The proposed changes to the Cape Igvak Management Plan could be economically devastating to the native villages and our community.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan. Therefore, I ask the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56.

Thank you for your consideration.

Respectfully,

Nathaniel Rose, F/V Historian, Kodiak Salmon Seine Permit Holder]



*Native Village of Ouzinkie
P. O. Box 130
Ouzinkie, AK 99644-0130*

nvo.clerk@gmail.com

RE: Opposition to Changes In the Cape Igvak Management Plan

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. Ouzinkie salmon fishermen participate in the Cape Igvak fishery and also benefit when other Kodiak fishermen are engaged at Igvak.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to 15% of the total Chignik sockeye salmon catch. It also insured that Chignik area fishermen harvest a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36 year average allocation of Kodiak fishermen ATTN: BOF Comments Boards Support Section/Alaska Department of Fish and Game P.O. Box 115526 Juneau, AK 99811-5526

under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of Chignik bound sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan.

Therefore, I ask that the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56. Thank you for your consideration.

Sincerely,

Robert Boskofsky President

Norine Jones
P.O Box 3
Chignik, AK 99564

December 12,



PC44
1 of 1

Alaska Board of Fisheries dfg.bof.comments@alaska.gov
P.O. Box 115526
Juneau, AK 99811-5526

Subject: Kodiak--Cape Igvak Fishery Relative to Proposals 51-56.

Dear Board of Fisheries Members

I have been in the Chignik salmon fishery for 46 years with my late husband Mori Jones as a crew member, permit holder and owner of a purse seine boat and salmon tender. My son now runs our seine boat.

Chignik is economically depressed. Its foundation is its two local sockeye salmon runs which are the focus of interception fisheries in Kodiak in the Cape Igvak Section and in Area M in the Southeastern District Mainland and the Dolgoi Area, in particular. In 2016, all three of those fisheries harvested numbers well beyond that defined by regulation. It is not right, the laissez faire approach on the interception of Chignik-bound sockeye salmon. We, Chignik, need your help, and a starting point would be to roll-back the Kodiak fishery, targeting non-local fish, mainly Chignik sockeye salmon at Cape Igvak. Kodiak has its own sockeye runs, at least two hatcheries, and a multitude of shore-based processors and of course, alternative industries and infrastructure producing jobs and economic stability. Try to get a job in Chignik. We no longer have a shore-based processor, not even one. We used to have two going back as far as about 100 years. Chignik needs greater catch volumes to stay afloat economically and culturally. There are no jobs in Chignik, and too much locally caught fish are now being processed in Kodiak and Sand Point because there is not sufficient volume to attract a land-based processor.

Respectfully, I ask that the Board seriously consider reducing and simplifying the Cape Igvak Section Management Plan as follows:

1. In the Cape Igvak Section during the period of June 1 through July 25, salmon fishing will close once **all** sockeye salmon harvested of all origins approach's 7.5% of the total sockeye catch in the CMA.
2. However, no fishing in the Cape Igvak Section will occur prior to July 26 unless there is reasonable assurance, based on in-season fishery performance data, that the pre-July 26th sockeye harvest in the Chignik Management Area will meet or exceed one million fish.

Thank you and sincerely,

Norine Jones



Submitted By
Toby Sullivan
Submitted On
12/27/2016 2:26:45 PM
Affiliation
Northwest Setnetters Association

Phone
907-360-8837
Email
tobysullivan@gmail.com
Address
PO Box 870
Kodiak, Alaska 99615

The Northwest Setnetters Association opposes the ADF&G recommendation to change the biological escapement goals, (BEG), for Karluk Lake early and late run sockeye. ADF&G is recommending changing the Karluk Lake early-run BEG of 110,000 to 250,000 to 150,000–250,000 and the late-run BEG of 170,000 to 380,000 to 200,000–450,000 sockeye.

Northwest Setnetters Association believes that raising the lower bound of both Karluk Lake escapement goals, by 40,000 fish for the early run escapement, and by 30,000 fish for the late run, has allocative effects detrimental to Kodiak set gillnet fishermen. NWSA believes these allocative effects should be considered by the Board of Fish and that these escapement recommendations should be rejected.

Sockeye from Karluk Lake have historically been targeted by both seine and gillnet fishermen on the west side of Kodiak Island. Since 1980 however, the ratio of sockeye caught on Kodiak's west side by gillnet fishermen had dropped considerably compared to seine caught fish, from 90% in 1980 to 50% in 2016. NWSA believes this trend can be explained by several factors, including increased efficiency of the seine fleet and openings in seine-only areas at the mouth of the Karluk River.

While the issue of increased seine vessel efficiency is beyond the scope of this comment, NWSA believes that raising the lower bounds of Karluk Lake sockeye escapements increases the likelihood of early season closures in areas open to both gear groups, in order to ensure reaching the suggested increased lower escapements. In years of robust sockeye runs however, in order to prevent over-escapement, such early season closures increase the likelihood of late season openings in seine-only areas at the mouth of the Karluk River. Indeed, such late season openings in seine only terminal areas, implemented to prevent overescapement, have happened many times in the past. NWSA believes these seine only openings have contributed to the trend of a decreasing gillnet component of Karluk bound sockeye since 1980.

NWSA believes that ADF&G's recommendation to raise the lower escapement bounds for Karluk sockeye increases the likelihood of such seine area only openings, and is therefore allocative in effect, and should be rejected by the Board of Fish.

NWSA is also concerned that the methodology used by ADF&G in its current recommendation to increase Karluk Lake sockeye escapements is new and unproven, and therefore worthy also of increased scrutiny by the Board of Fish.



IN REPLY REFER TO:
OSM 16104.GP

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

DEC 15 2016

Mr. John Jensen, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Jensen:

The Alaska Board of Fisheries (Board) will consider 25 proposals, among other issues, at its Kodiak Area Finfish meeting on January 10-13, 2017. We have reviewed the proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations on proposals that may have impacts on Federally qualified subsistence users and fisheries resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning these materials.

Sincerely,

Eugene R. Peltola, Jr.
Assistant Regional Director

Enclosure

cc:	Sam Cotten, ADF&G	Glenn Haight, ADF&G, Juneau
	Anthony Christianson, Chair FSB	Jill Klein, ADF&G, Anchorage
	Lisa Olson, ADF&G, Anchorage	Stewart Cogswell, OSM, Anchorage
	Hazel Nelson, ADF&G, Anchorage	Scott Kelly, ADF&G Juneau
	Thomas Brookover, ADF&G, Anchorage	Interagency Staff Committee
	Administrative Record	



RECOMMENDATIONS
ALASKA BOARD OF FISHERIES PROPOSALS
KODIAK MANAGEMENT AREA
U.S. FISH AND WILDLIFE SERVICE, OFFICE OF SUBSISTENCE MANAGEMENT

January 10 – 13, 2017

Kodiak, Alaska



Proposal 60 – 5 AAC 18.XXX. Karluk River Special Harvest Area Salmon Management Plan; and 5AAC 18.362. Westside Kodiak Salmon Management Plan. Create a special harvest area (SHA) allowing the Kodiak Regional Aquaculture Association to harvest Karluk River sockeye salmon deemed excess to escapement needs, as follows:

Current Federal Regulations: Federal subsistence regulations do not address a specific salmon fishery for the Karluk system and near shore waters under Federal subsistence fisheries jurisdiction. Federal subsistence regulations do not address commercial fishing or the proposed cost recovery mechanism or efforts. The scope of the waters under Federal subsistence fisheries jurisdiction includes the mouth and marine waters (approximately 11 square miles) surrounding the Karluk River Lagoon as described below.

§ ____ 100.3 Applicability and scope.

(a) The regulations in this part implement the provisions of Title VIII or ANILCA relevant to the taking of fish and wildlife on public land in the State of Alaska. The regulations in this part do not permit subsistence uses in Glacier Bay National Park, Kenai Fjords National Park, Katmai National Park, and that portion of Denali National Park established as Mt. McKinley National Park prior to passage of ANILCA, where subsistence taking and uses are prohibited. The regulations in this part do not supersede agency-specific regulations.

(b) The regulations contained in this part apply on all public lands, including all inland waters, both navigable and non-navigable, within and adjacent to the exterior boundaries of the following areas, and on the marine waters as identified in the following areas:

(1) Alaska Maritime National Wildlife Refuge, including the:

(i) Karluk Subunit: All of the submerged land and water of the Pacific Ocean (Sheliokof Strait) extending 3,000 feet from the shoreline between a point on the spit at the meander corner common to Sections 35 and 36 of Township 30 South, Range 33 West, and a point approximately 1¹/₄ miles east of Rocky Point within Section 14 of Township 29 South, Range 31, West, Seward Meridian as described in Public Land Order 128, dated June 19, 1943;

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

Impact to Federal subsistence users/fisheries: If this proposal is adopted as written, Federally qualified subsistence users who choose to fish in the marine waters under Federal subsistence



fisheries jurisdiction near the community of Karluk may encounter competition or interference by much larger commercial fishing vessels performing the proposed cost recovery effort. During the proposed commercial fishing cost recovery efforts, subsistence users fishing within the Karluk Lagoon may experience lower densities of salmon potentially reducing efficiency and effectiveness of their fishing efforts.

Federal Position/Recommended Action: The OSM recommendation is to **Oppose** this proposal.

Rationale: If adopted as proposed, and the Alaska Department of Fish and Game determines “excess escapement” is available from either or both Sockeye Salmon runs, the resulting cost recovery fisheries may result in challenges to the continuation of subsistence uses for Federally qualified subsistence users during portions of the salmon returns to the Karluk River watershed.

Proposal 66 – 5AAC 64.022. Waters; seasons; bag, possessions limits within the Kodiak Road Zone: Repeal closed waters provisions for sportfishing for salmon within the Kodiak Road Zone. Proposal 66 also seeks to change the season and bag and possession limits for Coho Salmon 20 inches or greater in length in this area.

These comments are focused on the marine waters portion of the proposal which may impact Federally qualified subsistence users fishing with a rod and reel in the waters of Gibson Cove and Womens Bay open to Federal subsistence fishing. Several Kodiak Road Zone anadromous streams flow into Womens Bay where Federally qualified subsistence users could participate in the Federal subsistence fisheries with a rod and reel while fishing from the shore or from a boat.

Current Federal Regulations:

§ ____ . 27(e)(9)(i)

(i) You may take fish other than salmon, rainbow/steelhead trout, char, bottomfish, or herring at any time unless restricted by the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence net fisheries, you may retain them for subsistence purposes.

(ii) You may take salmon for subsistence purposes 24 hours a day from January 1 through December 31, with the following exceptions:

(iii) You may not subsistence fish for salmon in the following locations:

(A) Womens Bay closed waters—All waters inside a line from the tip of the Nyman Peninsula (57°43.23' North latitude, 152°31.51' West longitude), to the northeastern tip of Mary's Island (57°42.40' North latitude, 152°32.00' West



longitude), to the southeastern shore of Womens Bay at 57°41.95' North latitude, 152°31.50' West longitude.

(B) Buskin River closed waters—All waters inside of a line running from a marker on the bluff north of the mouth of the Buskin River at approximately 57°45.80' North latitude, 152°28.38' West longitude, to a point offshore at 57°45.35' North latitude, 152°28.15' West longitude, to a marker located onshore south of the river mouth at approximately 57°45.15' North latitude, 152°28.65' West longitude.

(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(A) In the Federal public waters of Kodiak Island, east of the line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within 1 mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

(viii) You may take salmon only by gillnet, rod and reel, or seine.

Impact to Federal subsistence users/fisheries: Yes. Federally qualified subsistence users fishing with a rod and reel in the waters under Federal subsistence fisheries jurisdiction along the Road Zone are required to possess a Federal subsistence permit. Adoption of this proposal may both increase Coho Salmon escapement into the Kodiak Road Zone anadromous streams as well as increase the opportunity for instream Coho Salmon to spawn instead of being harvested in the sport fishery. Increasing the chances of survival and opportunity to spawn may improve the overall Coho Salmon returns to the Kodiak Road Zone streams in the future, potentially resulting in increased subsistence opportunities for Federally qualified users targeting those stocks. If this proposal is adopted and Coho Salmon returns generally improve along the Kodiak Road Zone, the Kodiak National Wildlife Refuge Manager with delegated authority for managing this Federal subsistence fishery will be less likely to restrict the subsistence fishery due to conservation concerns or threats to continuation of subsistence uses.

Federal Position/Recommended Action: The OSM recommendation is to **Support** this proposal.



Rationale: The Alaska Department of Fish and Game indicates additional restrictions on the Kodiak Road Zone marine and freshwater sport fisheries are necessary to conserve the Coho Salmon runs. Adoption of this proposal may assist with the long term rebuilding of the road system stocks potentially resulting in future increases of subsistence fishing opportunities for Federally qualified subsistence users.

Proposal 67 – 5AAC 64.022. Waters; seasons, bag, possession, annual, and size limits; and special provisions for the Kodiak Area. Decrease rockfish sport fishery bag and possession limits in Chiniak Bay and Marmot Bay. The proposed bag limit for rock fish is three fish per day and six in possession, of which only two fish per day and four in possession may be nonpelagic rockfish, and only one fish per day and two in possession may be yelloweye rockfish; no size limit.

Current Federal Regulations:

§____.27(e)(9) Kodiak Area...

(i) You may take fish other than salmon, rainbow/steelhead trout, char, bottomfish, or herring at any time unless restricted by the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence net fisheries, you may retain them for subsistence purposes

(iv) You must have a subsistence fishing permit for taking salmon, trout, and char for subsistence purposes. You must have a subsistence fishing permit for taking herring and bottomfish for subsistence purposes during the State commercial herring sac roe season from April 15 through June 30.

(vii) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.

(viii) You may take salmon only by gillnet, rod and reel, or seine.

§____. 27 Subsistence taking of fish.

(b)(16) Unless specified otherwise in this section, you may use a rod and reel to take fish without a subsistence fishing permit. Harvest limits applicable to the use of a rod and reel to take fish for subsistence uses shall be as follows:

(i) If you are required to obtain a subsistence fishing permit for an area, that permit is required to take fish for subsistence uses with rod and reel in that area. The harvest and possession limits for taking fish with a rod and reel in those areas are the same as indicated on the permit issued for subsistence fishing with other gear types.



(ii) Except as otherwise provided for in this section, if you are not required to obtain a subsistence fishing permit for an area, the harvest and possession limits for taking fish for subsistence uses with a rod and reel are the same as for taking fish under State of Alaska subsistence fishing regulations in those same areas. If the State does not have a specific subsistence season and/or harvest limit for that particular species, the limit shall be the same as for taking fish under State of Alaska sport fishing regulations.

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

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

Impact to Federal subsistence users/fisheries: Adoption of this proposal may contribute to the conservation of the rock fish populations in the Women's Bay and Gibson Cove area, both of which are within the Chiniak Bay area. Adoption of this proposal may assist with reducing future conservation concerns and assist with reducing challenges to continuation of subsistence uses. The current Federal subsistence fisheries rock fish harvest limits are the same as the State of Alaska subsistence fishery limits, which are 2 ling cod and 10 rock fish per day.

Federal Position/Recommended Action: The OSM recommendation is to **Support** the proposal.

Rationale: The Alaska Department of Fish and Game statewide harvest survey data estimates approximately 105,000 rock fish have been harvested in Chiniak Bay sport fishery from boats between 2006 through 2015 (annual range 5,040 – 18,570 fish). The estimated harvests for the Woman's Bay and Gibson Cove portion of Chiniak Bay are not available. A reduction to overall mortality rates of rock fish in the area of concern through restricting the overall sport fishery bag and possession limits may assist with ensuring long term sustainability of the resource.

The current Federal subsistence fisheries rock fish harvest limits are the same as the State of Alaska subsistence fishery limits which are 2 ling cod and 10 rock fish per day. To date, no rock fish harvest has been reported from Gibson Cove or Womens Bay by Federally qualified subsistence users. If warranted, the Federal inseason manager may reduce the bag and possession limits of rock fish in the Federal subsistence rod and reel fishery authorized in Woman's Bay and Gibson Cove.



Proposal 70 – 5AAC 64.022. Waters; seasons; bag, possession, annual, and size limits; special provisions for the Kodiak Area. Prohibit the use of bait in fresh waters of Kodiak Archipelago from October 1 - August 15.

Current Federal Regulations:

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§100.25 (j)

(4) You may not intentionally waste or destroy any subsistence-caught fish or shellfish; however, you may use for bait or other purposes whitefish, herring, and species for which bag limits, seasons, or other regulatory methods and means are not provided in this section, as well as the head, tail, fins, and viscera of legally taken subsistence fish.

§ ____ .27 Subsistence taking of fish.

(b) Methods, means, and general restrictions. (1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

(xix) A rod and reel; and

§ ____ .25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a “barb” means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

§ ____ .27(e)(9) Kodiak Area...

(vii) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.



(viii) You may take salmon only by gillnet, rod and reel, or seine.

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

Impact to Federal subsistence users/fisheries: Yes. Current Federal subsistence fishing methods and means regulations authorize the use of specific baits by Federally qualified subsistence users who choose to fish with a rod and reel in the waters under Federal subsistence fisheries jurisdiction of the Kodiak area. Federal subsistence statewide regulations define bait as whitefish, herring, and species for which bag limits, seasons, or other regulatory methods and means are not provided in Federal subsistence regulations, as well as the head, tail, fins, and viscera of legally taken subsistence fish. For example, a Federally qualified subsistence user targeting fish in a Kodiak Area Federal subsistence rod and reel fisheries could use salmon eggs or other viscera recovered from a salmon harvested in a Federal subsistence fishery for bait.

Conversely, if this proposal is adopted and use of bait is prohibited under State sport fishing regulations, a Federally qualified subsistence users could not use baits not authorized by ANILCA such as imported anchovies or farmed shrimp because Federal subsistence regulations adopt by reference the State sport fishing regulations. If this proposal is adopted, the Federally qualified subsistence users fishing in the fresh water of the Kodiak area would be prohibited for using certain types of bait. Prohibiting the use of bait in rod and reel fisheries for some species of salmon, trout, and char may result in lower success rates and reduced harvest efficiency potentially requiring increased effort to achieve harvest goals.

Federal Position/Recommended Action: The OSM recommendation is to **Oppose** this proposal.

Rationale: The OSM Opposes this proposal because adoption of this proposal will effectively restrict Federally qualified subsistence users utilizing a rod and reel in the Federal subsistence fisheries of the Kodiak Area by prohibiting the use of baits other than whitefish, herring, and species for which bag limits, seasons, or other regulatory methods and means are not provided in Federal subsistence regulations, as well as the head, tail, fins, and viscera of legally taken subsistence fish.

Adoption of this proposal may result in placing the administrative burden on Federally qualified users who desire to continue to use the types of bait not defined in ANILCA (i.e. farmed shrimp) while using a rod and reel in the Federal subsistence fisheries by requiring users to submit a Special Action Request to the Federal Subsistence Board to temporarily reauthorize the use of those types of bait not authorized in ANILCA. The Federally qualified user would be further burdened by being required to submit a proposal to the Federal Subsistence Board during the next fisheries regulatory cycle to make the use of all types of bait in the referenced fisheries permanent.



OSM is not aware of the current levels or types of bait usage in the Federal subsistence rod and reel fisheries in Federal public waters of the Kodiak area. Additionally, the Federal subsistence management program has not received proposals to prohibit the use of any type of bait in the Federal subsistence fisheries to date. Finally, adoption of this proposal will result in divergence in State and Federal regulations which may cause user confusion and enforcement concerns.



OUZINKIE NATIVE CORPORATION

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

RE: Opposition to Changes in the Cape Igvak Management Plan

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. Ouzinkie salmon fishermen participate in the Cape Igvak fishery and also benefit when other Kodiak fishermen are engaged at Igvak.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to 15% of the total Chignik sockeye salmon catch. It also insured that Chignik area fishermen harvest a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36 year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of Chignik bound sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igak Management Plan.

Therefore, I ask that the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56. Thank you for your consideration.

Respectfully,

Darren Muller, Sr.
Chairman
Ouzinkie Native Corporation



Submitted By
Patrick Pikus
Submitted On
12/27/2016 4:18:23 PM
Affiliation
F/V Polar Star

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Address
P.O. Box 2843
Kodiak, Alaska 99615

Re: Proposals 62 and 63

I oppose the adoption of either of these proposals.

I do not believe that purse seining near the Ayakulik river mouth is to blame for the recent decline in Chinook returns. Chinook are in decline in many areas around the state, and, as the proposers state, purse seiners are required to release Chinook greater than 28 inches.

Patrick Pikus
F/V Polar Star

Submitted By
Patrick Pikus
Submitted On
12/27/2016 3:57:57 PM
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F/V Polar Star

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Re: Proposals 51-56, Modifications to the Cape Igvak Salmon Management Plan

I oppose the adoption of any of these proposals.

I have fished salmon in the Kodiak Management area since the mid-60's, and I am an original issue permit holder. The Cape Igvak Salmon Management Plan has been an effective tool for salmon management in the south Mainland District since it was instituted, and I do not believe it should be modified at this time. In many years, the Cape Igvak salmon fishery provided a significant fraction of the salmon income for Kodiak fishermen. The Alaskan salmon fisheries see ups and downs through the years - it's part of the business. In 2016, the Kodiak area had the worst season in many years (\$66,000 in ex-vessel value, compared with over \$120,000 for the Chignik area). Kodiak area salmon purse seine permits are valued at around \$38,000, compared to \$167,000 for Chignik. Also, Kodiak has many more active permits than the Chignik area; during the early part of the season, we need the geographical distribution to avoid overcrowding of the grounds. Furthermore, the weight average for sockeye caught in the Chignik outside areas is less than for sockeye caught in the lagoon, which points to the fact that when fishing in the outside areas, they are intercepting non Chignik-bound sockeye. They are intercepting fish bound for other management areas.

For these reasons, I oppose the adoption of these proposals. It would be a step backwards to change one of the best salmon management plans in the state.

Patrick J. Pikus
F/V Polar Star.



Submitted By
Peter Alexson
Submitted On
12/27/2016 10:59:14 AM
Affiliation
Kodiak Seiner

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907-299-3127
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Address
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Homer, Alaska 99603

Dear Board Members,

I live in Homer, AK. I represent myself as a 28 year Kodiak Seiner.

My concerns have to do with proposals 51-56.

I am opposed to proposals 51-56. As our new genetic stock composition study shows not all sockeye caught in the Cape Igvak Area are Chignik bound.

In fact from June 1 thru July 25, only 38% of the sockeye harvested are Chignik bound.

As with many seine fisheries there is intercept. I can only imagine the number of sockeye caught in Chignik that are Kodiak bound. I'm sure as more and more genetic sampling is done this will become more apparent. We all catch some of the other's fish. To what end and cost are we going to micro-manage each and every cape?

Thank You,

Pete Alexson



December 15, 2016

To Whom It May Concern:

My name is Peter Anderson and I've been a fisherman for over twenty years and now run my own boat and I am a permit holder in Chignik, Alaska, where I live year round as well. I have a family of six and we have all suffered from the devastating effects of the fishery, not only in the price of fish but also the limited amount of processors that come to Chignik. Three years ago I took out a loan from the State of Alaska to work on my boat, as it needed repair and now we are struggling to make payments as well as trying to make it through the year here in Chignik with the prices of fuel and groceries. The hardships have made it impossible for our family to leave Chignik for medical or even to leave to visit family outside of Chignik.

I support Proposals 51 through 56 and believe that if the inbound fish to Chignik weren't being intercepted by Igvak we would not have been hit so hard financially. When Kodiak was having a hardship years ago, they were allowed to open their fishery to intercept Chignik fish and now we are having a hardship due to that decision and can't even make ends meet with Kodiak allocation of our total "anticipated" catch. So now that we are having a hardship, would Kodiak think it was fair for us to be allocated a percentage of their fish? I highly doubt it. It was opened to supplement Kodiak's fisherman, but as I see it they are benefitting more from our fishery than we are. Especially with their competitive prices of the many canneries in Kodiak and how they cater to their fisherman, while we are left out of the accessible variety of a competitive market.

I am also a City of Chignik Council Member and I can also speak for the City being in financial distress due to the fact that the City has depended on the landing fish tax to stay running. It has devastated the local economy in that this is primarily a fishing community and therefore, most people have moved out of this town due to not being able to make a living here and we barely have enough children to keep the school open. It was closed for two years and had a huge impact on the children here as well.

We rely heavily on fishing in Chignik and so do the surrounding villages, and if we can keep the allocation here and not just to supplement Kodiak's fisherman, it might be beneficial not to just my family, but to the community as a whole.

I hope that the decisions you make will be fair to Chignik, AK fisherman and all of the surrounding communities that depend on the Chignik fishery for a living and will consider our dire financial state and livelihood.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter Anderson", with a long horizontal flourish extending to the right.

Peter Anderson

F/V Patti Ann



Submitted By
Guy Pizzuti
Submitted On
12/27/2016 4:58:21 PM
Affiliation
Publix Super Markets

Publix Super Markets Inc. operates 1150 supermarkets in the Southeastern United States. We have a proven track record support for Alaskan seafood. At years end, Alaskan seafood will represent just over 10% of our total sales totaling 4.8 million lbs sold. Our support of Alaskan seafood can be confirmed by ASMI. We have worked with them on a number of promotions and have shared our internal efforts to promote Alaskan seafood at our own cost. We proudly display the Alaska seafood logo in our full services cases.

In 2013, in an effort to grow our Alaskan seafood footprint, we became the first company to offer Bairdi crab in the southeast. To accomplish this goal, we chose to partner with the Central Bering Sea Fisheries Association (CBSFA). We felt our entry into this market could have a more widespread impact working with CBSFA vs one of the large Alaskan players. The development of this product in our market, came at a great expense. Through a number of avenues including in store point of sale material, training material, radio commercials, corporate sampling, and celebrity appearances we successfully educated our staff and more importantly customers on the superior attributes of this product. Over the past three years, we have grown this product to represent 33% of our crab sales at over 1.2 million lbs. It is important to note that this is not a tradeoff between Alaskan species. Our move into bairdi crab was a conscious decision on our part to back away from Canadian opilio and replace it with Alaskan bairdi. Just this year, we agreed to work with the Norton Sound Economic Development Corporation (NSEDCC) on a number of species including bairdi crab.

The proposal to eliminate the bairdi fishery combined with the quota reduction on opilio will have a tremendous impact on our business. The removal of bairdi crab, combined with the cost increases across the crab complex that result from the bairdi closure and opilio quota decline, are estimated to cost our company approximately \$15 million in sales, which equates to a volume decline of 1.8 million lbs or 37.5% of our Alaskan volume. The impact of this combination of regulations will be widespread across retail. Volume will be reduced across all retail by a minimum of 15%.

While the impact to our business is significant, the impact to families that rely on this product to make a living is a much greater concern to Publix. We selected CBSFA and NSEDCC because of their ability, through our procurement, to support those fishing communities..

Retailers are willing to build markets and develop new products based on a level of stability to the item. It is very difficult to develop a product in a market when availability is not consistent. It is equally difficult to gain consumer confidence in a market with large price fluctuations that result from massive quota changes.

Publix is a strong believer in the importance of sustainability. We were one of the first to recognize the Alaska RFM scheme. We believe Alaska should be applauded for their commitment to sustainability. The success is unprecedented.

That being said, fishery management must balance the impact to the species in question while minimizing the impact to those that rely on fishery. We believe this unique combination of events between bairdi and opilio crab will cause excessive harm to those that rely on the fisheries. We ask that you consider the widespread impact to the industry; those that harvest, those that sell, and all those in between that rely on these fisheries when making your final decision. It is our hope that you will allow some level of bairdi harvest in 2017 and look for a more long term rebuilding plan.

Thank you in advance for your consideration.

Sincerely,

Guy Pizzuti

Category Manager - Publix Seafood



Submitted By
Quinnan Mcwethy
Submitted On
12/23/2016 4:55:59 PM
Affiliation

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I disagree with all the proposals. I am a lifelong 2nd generation kodiak salmon seiner and these proposals would make it a lot harder for me to make a living. We are already struggling to make a living seining in Kodiak and these proposals would make it more difficult to make ends meet.



December 26, 2016

Raechel Allen

PO Box 84

Chignik, Ak 99564

To the Chairman and Members of the Board of Fish:

I have been in Chignik since I was 9. I have been a deckhand for 10yrs and have run a seiner (between me and my husband) for 28years. I support proposal 51-56.

Years ago when 15% was given, it was thought by many that Chignik was having a bonanza. And it was even suggested that giving the 15% was for the welfare of Chignik to keep the limited entry from issuing more permits. But, this short sighted approach never imagined the devastating effects that would come when salmon prices rapidly declined. The allocation was given at a time of plenty and no one present ever even mentioned the possibility of hard times as long as there were enough fish to go around. There was no consideration that this would be Chigniks only real resource to generate income for its residents.

It has slowly siphoned away enough income that would have been spent on bigger boats that would have given the ability to fish the cod resource competitively, which is now caught largely by Kodiak based boats. It would have been spent on gear and diversification.

It siphoned enough fish away that shore based processors have all but abandoned Chignik. The remaining one brings in a floater for a brief part of the season. Most are longhauled. Now all species available in the area including halibut are processed and taxed in the interception areas on either side of us.

Since 1978, the Igvak allocation has conservatively removed at least \$41 million from the Chignik fishermen (calculated on Igvak catches at 80% thru 2013 totaling over 6,920,000 sockeye at just \$1.00lb)

My family and I have repetitively been out East catching upwards of 1000 sockeye a day, and 24hours after Igvak opened our catch dropped to less than 100 a day. They are very effective. We then only had a weak second run to hope for and scratch on. We don't make much income from other salmon species.

The culture in Chignik Bay is changing and it is from lack rather than abundance.

Residents are steadily leaving the villages. This has caused the closure of the school in the Bay in 2013-2014 school year. We are anticipating it to be closed next year. The few who remain struggle to make ends meet. The only year-round store (run out of the living room) has stated that many residents cannot pay their accounts. They have given notice to the community that they will be leaving town. No house has been built in the Bay aside from HUD housing for low income families in over 20 years. The only barge line, Coastal Transportation, has been pairing down service because it is not economically feasible to even drive into Chignik because of less commerce due to less fish to ship, less fishermen making gear purchases to import, and less households to bring in groceries for. The more they abandon Chignik the more folks will struggle with higher shipping costs.



Chignik struggles to keep the electricity flowing as the generator is in need of repair and stops frequently and the backup generator is in peices.

I have witnessed two young men whom were childhood friends, who worked as deckhands in the late 80's and 90's, now living in Anchorage homeless and on the streets.

Chignik is turning into a seasonal fish camp for those who can find a way to gear up or haven't lost their boat.

No one thing is solely responsible for the demise of Chignik, but if the 15% allocation had never been given, Chignik would likely not be in this state of entropy. If 200,000 more fish were allowed to return to Chignik annually in this time of need, at \$1.00 a lb it would immediately inject \$1,200,000 into the fishing economy of Chignik giving each crew \$2,000 and every boat \$14,000 more dollars. This amount will slow and over time even turn around the demise of Chignik. But shouldn't, in our time of need, the people of Chignik receive the same type of immediate response given Kodiak in 1978. Kodiak has the luxury of Wal-Mart and a hospital and restaurants and law enforcement and processors and paved roads and tourism, a coastguard base and many fisheries. Please at the least suspend the Igvak allocation letting the salmon return to Chignik until such a time that a healthy economy and viability return to Chignik.

Sincerely,

A handwritten signature in cursive script that reads "Raechel Allen".

Raechel Allen

P.S. It is an offense to locate this meeting at Kodiak, making it more expensive for some and impossible financially for others in Chignik to attend. Isn't 15% for 39 years enough of our income being channeled into Kodiak? Anchorage would be an appropriate location.



Submitted By
Richard Blanc
Submitted On
12/27/2016 4:38:27 PM
Affiliation
High Rock Fisheries

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Mount Vernon, Washington 98273

Dear BOF,

Action required by the BOF

I urge you to "direct" the Kodiak F&G to manage the sockeye salmon fishery in Alitak District as follows:

- 1-Only open the non-traditional Dog Salmon Flats Section from 1 June to 15 July or until the upper end of the BEG: 43,000-93,000 is achieved.
- 2-Open the traditional areas (i.e. seine and gillnet sections of the Alitak District) when the upper end of the BEG: 43,000-93,000 has been achieved.
- 3-Limit the area of the Dog Salmon Flats section to the area around the East and West streams ensuring a harvest of Dog Salmon stocks.

Rational

At the January 2014 BOF meeting in Kodiak, we recommended that the sockeye fishery in the Alitak District would not open until the general pink opening 6 July. This would allow for maximin escapement into Early Upper Station and Dog Salmon. Action taken by the BOF directed the Kodiak F&G to open Dog Salmon Flats Section only before the traditional areas of Cape Alitak, Alitak Bay, Moser Bay and Olga Bay Sections. We were told by the Kodiak F&G that they would keep the traditional areas closed and open the Dog Salmon Flats Section as needed to prevent over escapement into Dog Salmon allowing for as many fish as possible to escape into Early Upper Station.

2014 the fishery was managed in Dog Salmon Flats only achieving a 36,823 sockeye escapement. This was a 67% increase over the previous OEG goal of 25,000 fish.

2015 the fishery was managed only in the traditional areas achieving a 54,473 sockeye salmon escapement. This escapement didn't even reach the mid range BEG 68,000. Had the fishery been managed as the Kodiak F&G told us they would in 2014 the escapement would have been well above the mid-range BEG 68,000 fish approaching the upper end of 93,000 fish.

2016 the fishery was managed in the traditional areas and Dog Salmon Flats achieving 48,047 sockeye. Again this escapement didn't even reach the mid range BEG 68,000. Had the fishery been managed as the Kodiak F&G told us they would in 2014 the escapement would have been well above the mid-range BEG 68,000 fish approaching the upper end of 93,000 fish.

The Kodiak department stated in Memorandum November 9, 2016 p.4: Frazer Lake and Upper Station sockeye salmon runs came in weaker than forecasted. However, both runs were strong enough to allow for limited commercial salmon openings in the traditional fishing areas (i.e. seine and gillnet sections of the Alitak District). To facilitate for longer closures, the non-traditional Dog Salmon Flats Section also opened simultaneously with the traditional areas. This strategy effectively harvested more Frazer sockeye salmon per commercial salmon opening, allowing less Frazer sockeye salmon escapement, permitting the longer Alitak District closures. These longer closures allowed for more early-run sockeye salmon Upper Station escapement.

The net effect of simultaneously opening the traditional areas and the nontraditional Dog Salmon Flats Section prevented any extended fishery after 15 July in the traditional areas. After 15 July, when the Early Upper Station run was completed the surplus Dog Salmon escapement had been harvested in the Dog Salmon Flats Section and there were no extended openings from 15 July until the 8 Aug when management of Late Upper Station starts. In order to make a season you need days to fish, this strategy eliminated any extended fishing opportunity,

A Plea for Survival

As Alitak District set gill net fishermen we approached the BOF in 2014 on life support for our fishery and way of life. Since then it feels like our support is being disconnected by F&G management.

The Sockeye Fishery in Alitak District is no Longer a Viable Fishery



PC54
2 of 2

From 1976-2009 the average percentage of sockeye harvested in the Alitak District compared to the Kodiak Management Area was 26.27%.

From 2010-2016 the average percentage of sockeye harvested in the Alitak District compared to the Kodiak Management Area was 10.79%

In 2016 the average percentage of sockeye harvested in the Alitak District compared to the Kodiak Management Area was 8.88%.

The pre-season projection for harvestable sockeye in the Alitak District in 2017 is 73,000 fish less than the pre-season harvest projection in 2016.

Acknowledge that there is a problem. Concerted action is needed now,

F&G stated they would put as many fish as possible into Early Upper Station. Their management resulted in a minimum amount. Let's fix the problem not put a band-aid on the problem.

Action: Direct F&G to open the non-traditional Dog Salmon Flats only until the upper end of the BEG is met in Early Upper Station.

Best science by F&G states the current escapement goals into Fraser Lake of 137,000 will yield the best return per spawner. Then where are the fish? We caught substantially more fish when the escapement goal was 250,000-275,000.

Action: Arrange a peer review of the escapement goals.

We have been told by Research that Upper Station Lakes are the most fertile and healthy for rearing salmon of any lakes on Kodiak Island. Then where are the fish? There are no zero check fish? Why not? From 1980-1999 the average escapement for Early and Late Upper Station was 281,017. From 2000-2015 the average escapement for Early and Late Upper Station is 196,097. Where have an average of 84,920 fish gone?

Action: List as a sock of concern; Enhancement of the brood stock; Put more fish into Early Upper Station.

The F&G published a report in the early 1980's that the sockeye stocks bound for Olga Bay in the Alitak District principally migrate down the Westside of Kodiak Island.

The Westside Management Plan States: 5 AAC 18.362. Westside Kodiak Salmon Management Plan, (1) from June 1 through approximately June 15, as a mixed-stock fishery directed on early-run sockeye salmon returning to Karluk, Ayakulik, and Olga Bay systems;

Hopefully the completed DNA study will show this interception.

Action: Amend the Westside Management Plan to reflect the effect that it has on the Alitak District Management Plan: Establish some migratory pathways to allow for sufficient escapement and harvest in the Alitak District.

Please help us

The Alitak District needs regulatory assistance now not during the next Board cycle.

Thank you,

Richard Blanc

50 year Alitak District Fisherman



Submitted By
Richard
Submitted On
12/26/2016 5:12:44 PM
Affiliation
Kodiak Seiner

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9203429870
Email
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39142 Suchaview Rd
Homer, Alaska 99603

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

RE: Opposition to Proposals 51 through 56

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. My name is Richard Roth, I own and operate the F/V Kelly Girl. I have been working on Salmon Seiners around Kodiak Island since before I can remember. I have skippered boats for 7 seasons and currently own and operate the F/V Kelly Girl. The Cape Igvak section of the mainland district has provided for me and my family consistently through the years. June is a very slow month for most Kodiak fisherman and the Cape Igvak openings provide a small but needed boost in the early season. It does this several ways, not just limited to the fish boats catch in the Cape Igvak section. When there is a Cape Igvak opening, dozens of boats cross the Shelikof strait to fish there. This relieves pressure off of the few other Kodiak areas that are open so that for a few days there aren't so many fishermen competing over a small area. This helps many people make their living, including the set-netters that can't travel. Proposals 51 through 56 either severely limit or deem irrelevant the Cape Igvak area for the early sockeye run. These proposals would be detrimental to not only Kodiak seiners, but also setnetters and others that rely on salmon around Kodiak Island.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens. The 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan. Therefore, I ask the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56.

Regarding proposal 65 Having Kodiak fisherman increase mesh size in their nets would cost Kodiak fishermen tens of thousands per net, amounting well into the millions in cost to the fleet, excluding the cost of maintaining at least two nets so that it would even be possible to effectively catch pink salmon. Please reject proposal 65!! Thank you for your consideration.

Respectfully,

Richard Roth, Kodiak Purse Seine Fisherman



Submitted By
Rick Metzger
Submitted On
12/26/2016 10:49:51 AM
Affiliation
Alitak District Setnetters Ass.

To:

Alaska Board of Fisheries

Mr. Chairman and Board Members

Please carefully consider these comments on Proposals 57, 58 and 59

Proposal # 59 (reluctantly support)

Recent genetic and harvest area information clearly indicate that the Alitak area Olga Bay sockeye stocks are very weak and can barely support escapements and a very limited traditional fishery. I have always maintained that investigation of weak stocks should begin in the natal systems and work out to the return. It recent years the Dept. has been unable to provide conclusive data on the health and productivity of the systems in Olga Bay. Since statehood these systems have provided enough harvestable surplus to compliment the fisheries of the entire Kodiak Area and to be a mainstay of the Alitak Area set net fishery.

Recent seasons have shown the runs to be in continual decline. If it can be concluded that interception in some migratory pathway areas jeopardizes escapement and traditional fisheries then measures should be taken to open the path way home for Olga Bay stocks.

The biggest management hurdles to Olga Bay sockeye stocks are trying to manage simultaneous early runs to Frazer and Upper Station systems and maintaining a traditional fishery... The Upper Station OEG needs to be permanently removed from the management plan so the BEG can be maximized. Managing a system by both an OEG and a BEG simply does not work.

Proposal # 58 (support)

There seems to be a lot of conflicting information on jacking sockeye and what they mean to the health of a run. I support any management plan that caps jack production and allows a harvest or culling of excess jacks. If it is the intent of management to foster a run of 25% jacks there needs to be a harvest strategy for them.

Proposal #57 (support)

I am co-author of this proposal. These are desperate times for Alitak area set net fishers and in order to survive we need additional fishing opportunity in the Alitak area. ADF&G delivery records show a very minimal effort by seining after Sept.4 and that many set netters are still in the area and make deliveries whenever the Alitak set net areas are open after Sept. 4... This proposal if passed would have a very small effect on allocation between gear types but it could be the difference of survival to some Alitak area set net fishers.

This proposal was unanimously supported by the KAC after much discussion and I urge you to do the same.

A LITTLE HISTORY

The Alitak Area has a consistent history of producing returns of millions of pink salmon and sockeye returns of up to a million. At statehood the sockeye runs of Olga Bay were very depleted and pink salmon was the main stay of both the seine and set net fisheries. The season opened on July 6 and was usually over by Aug. 20. This schedule allowed the sockeye systems to rebuild to where in the late 70's and early 80's management impetus for the set net fishery shifted to almost entirely to Olga Bay sockeye stocks. This worked real well until now when we have no sockeye left.

At the implementation of limited entry in 1975 the Alitak Bay area salmon fishery qualified over 60 seine permits. The Alitak cannery was home port to over 50 seine boats and crews. 73 fishermen qualified for set net permits from the Alitak fishery. The fishery that qualified these permits was a pink salmon fishery. Alitak was by its own right a Kodiak Island fishing community. In 2016 the Alitak cannery carried only 15 Kodiak seine accounts and 19 set net accounts. More sockeye are now brought from Chignik than are harvested in the Alitak District.

To qualify for a SO4K set net permit an applicant needed a total of at least 15 points. Up to 10 points were awarded for economic dependence on the fishery. If we had to reapply for our permits today none of us would meet the economic dependence threshold required to even be in the fishery. If the Alitak set net fishery is to survive we need a complete reassessment of the sockeye stocks and renewed access to the pink salmon fishery that created us,



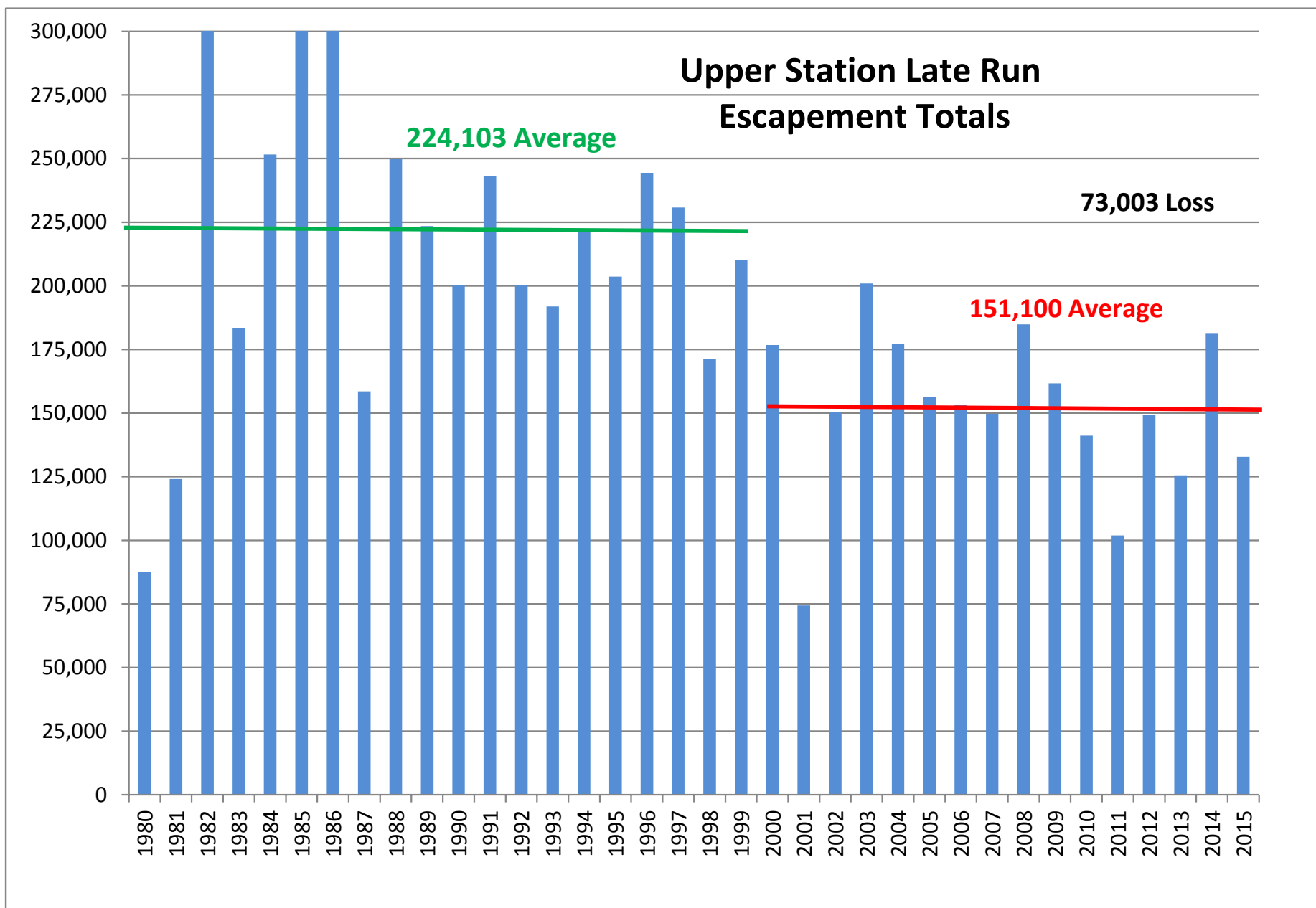
From: Rita Dieters
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Information to support proposals 59,58,57
Date: Sunday, November 27, 2016 1:47:27 PM
Attachments: [merged 6 pages Rita Dieters \(3\).pdf](#)

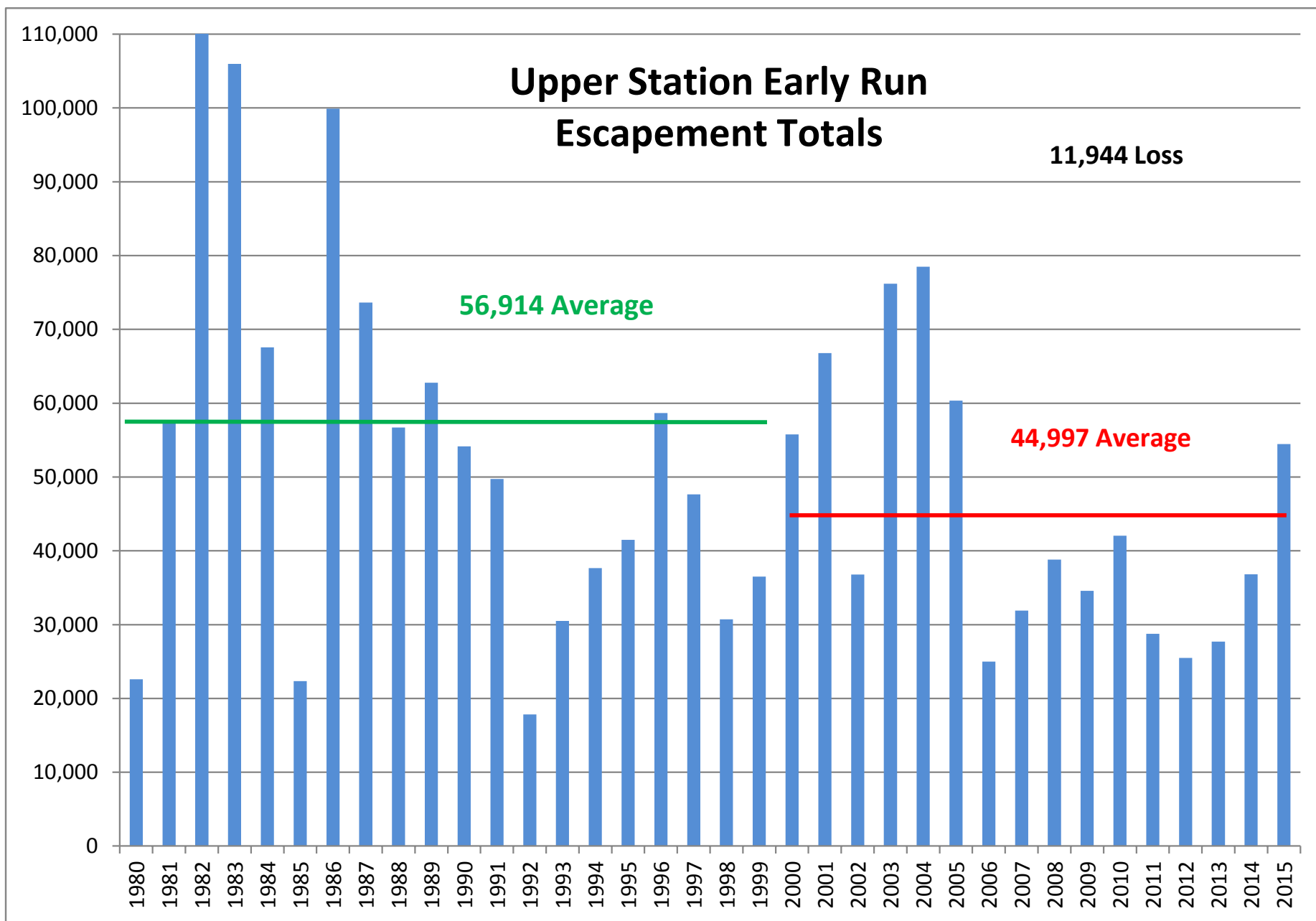
Hello,

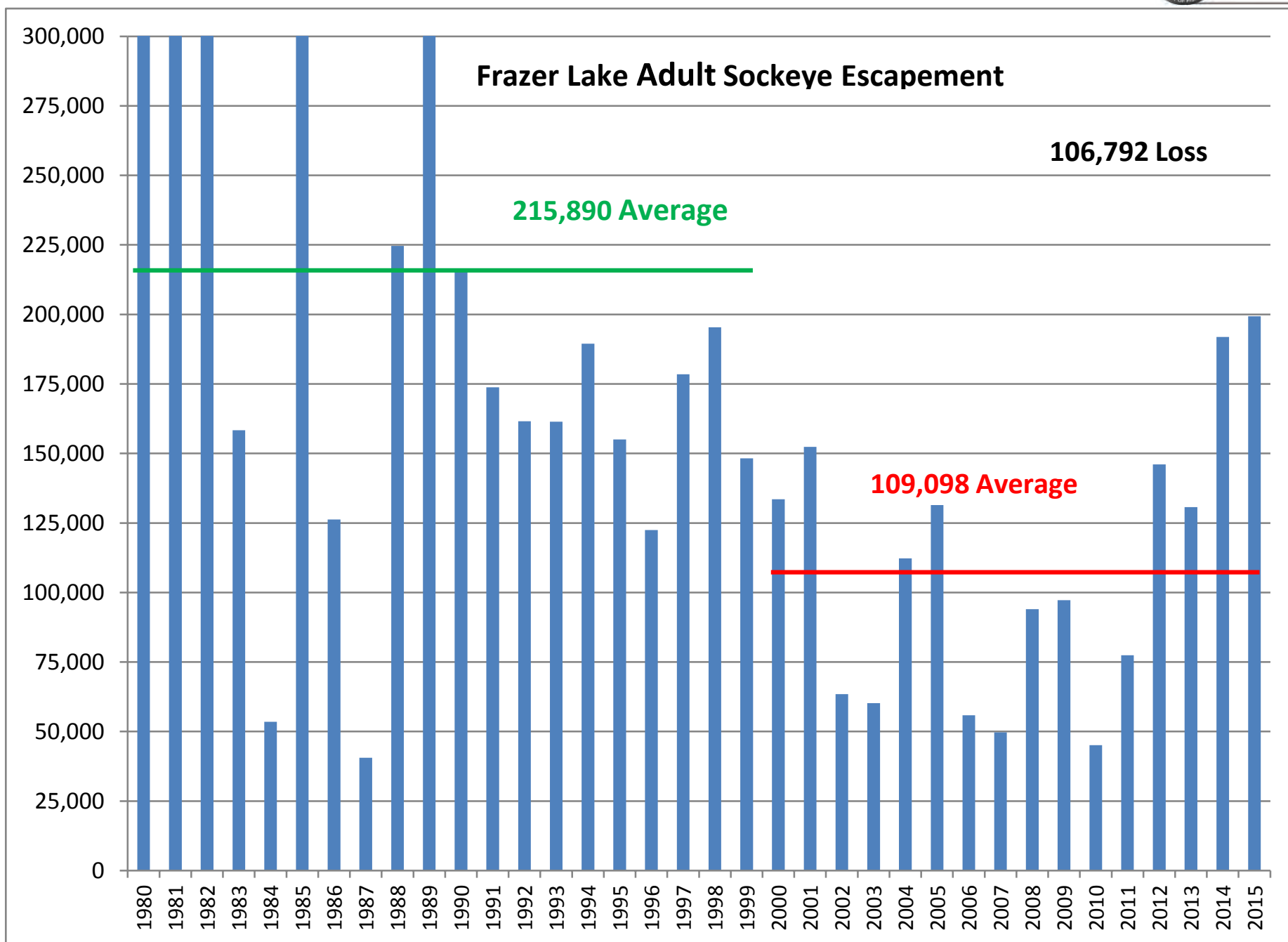
My name is Rita Dieters. I hold S04K-57515 set gillnet permit. Attached is a six page PDF document in support of proposals 57, 58, and 59.

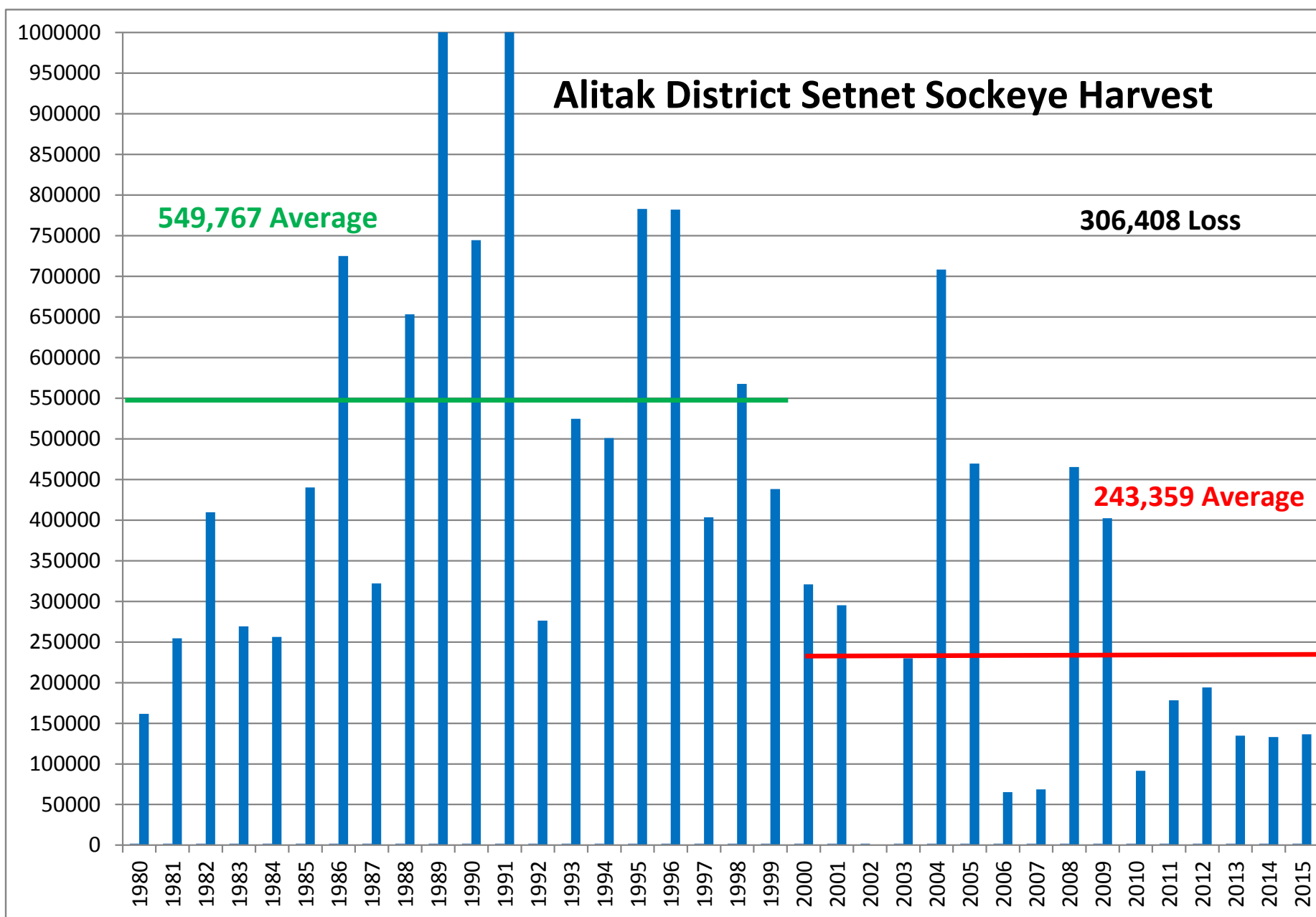
Thanks,
Rita Dieters

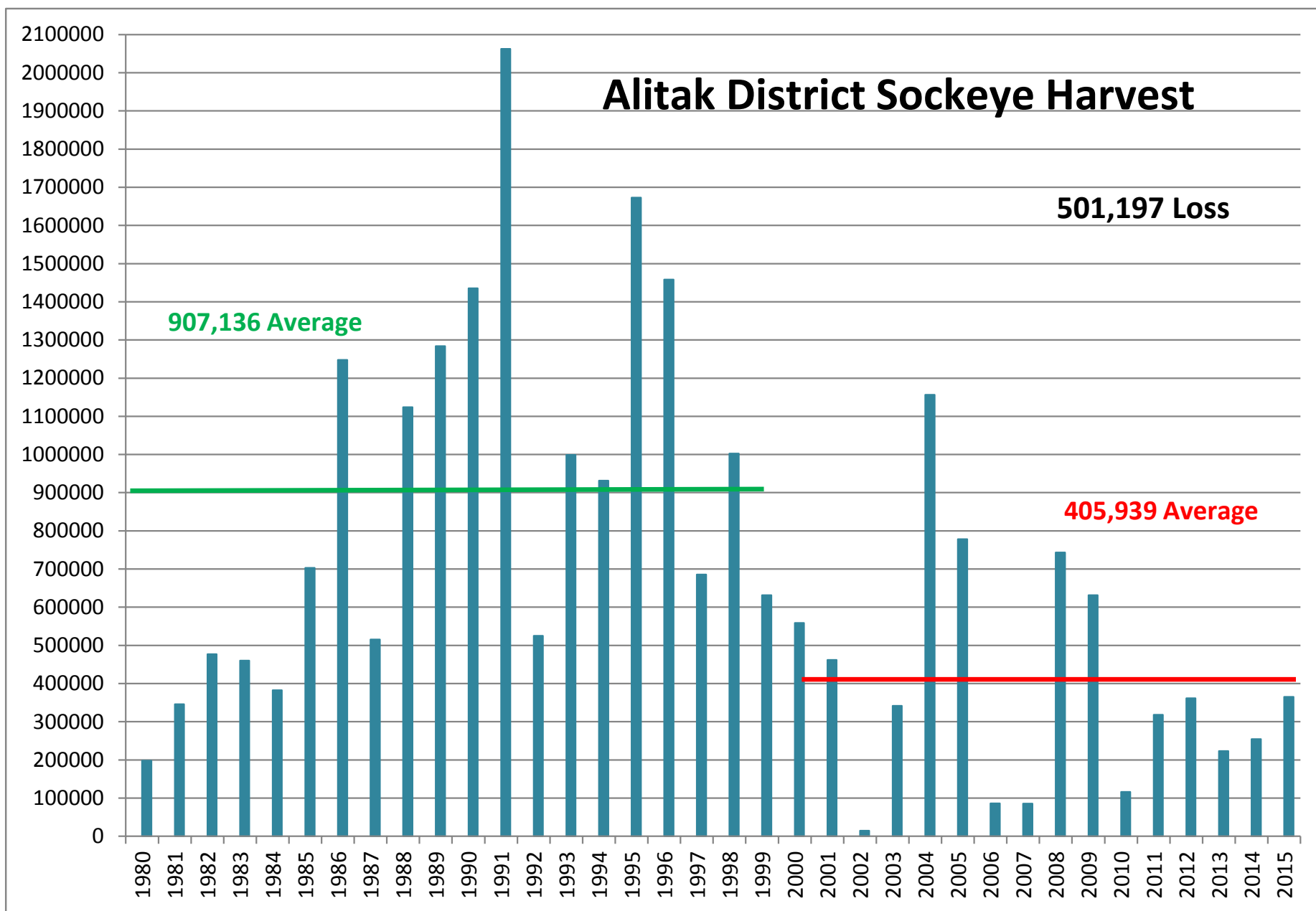
9709032931

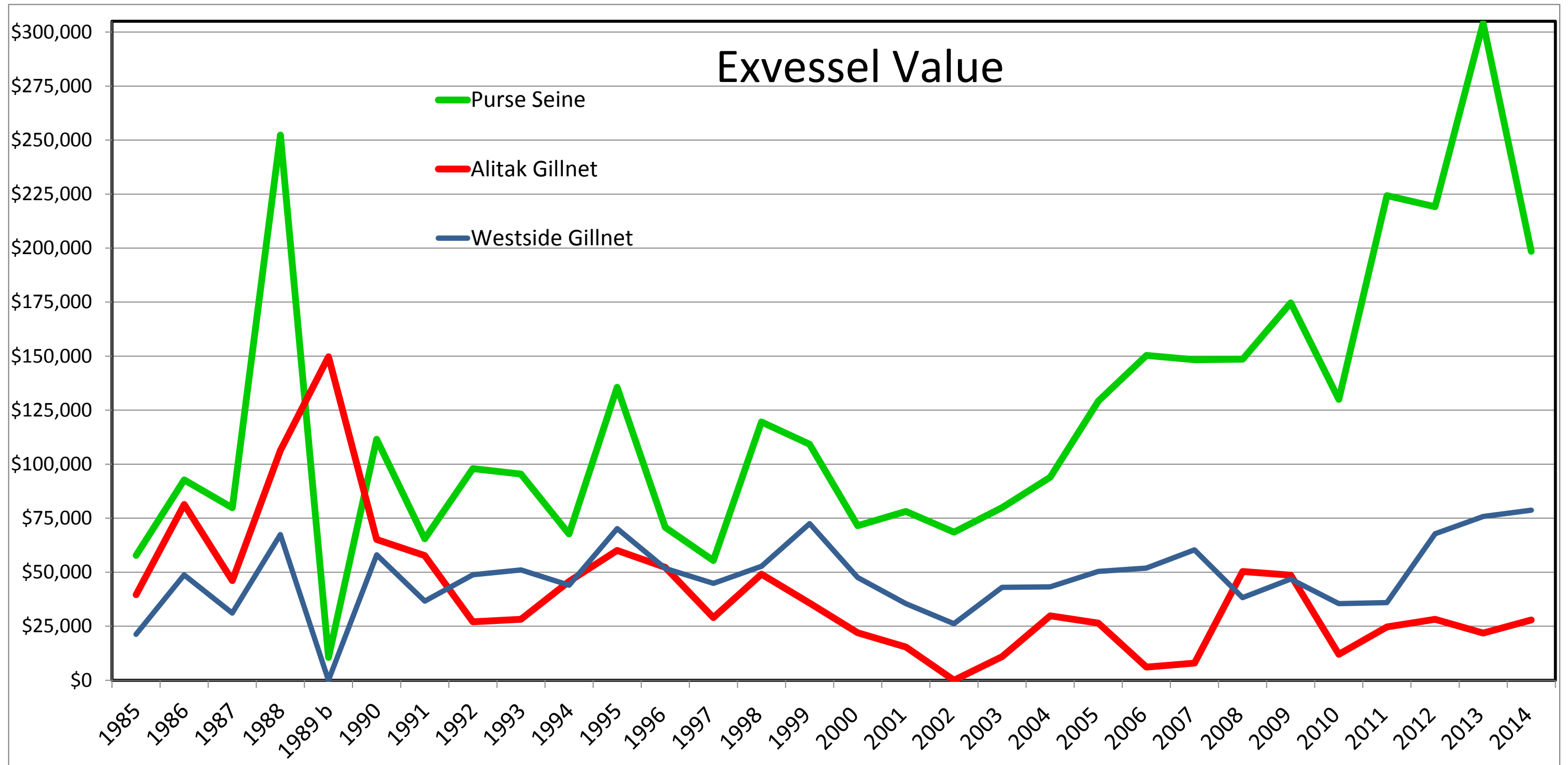














Submitted By
Robert Funkhouser
Submitted On
12/27/2016 10:39:41 AM
Affiliation
40 year Kodiak Purse Seiner

Phone
360-510-8607
Email
rtfunky@comcast.net
Address
2911 Plymouth Dr
Bellingham, Washington 98225

I have been fishing the in the Kodiak Salmon Seine fishery for 40 years. The Cape Igvak Section has been a large part of this fishery for as long as i can remember. Through the years fishing the Cape Igvak Section. A large portion the the fish harvested are mixed stocks heading to Kodiak Island rivers and streams. I'm very sure a large amount of fish harvested in the Chignik area are bound for Kodiak rivers and streams also. We have not reached the 15% Threshold very often through the years. It would be a extreme hardship on all Kodiak Salmon fisherman. Purse Seiners and Set Netters. To my knowledge there has never been a problem with reporting fish havested In the Cape Igvak Section. Having to report in with ADG&G would be problematic. Phone service and logistics for fisheries managers would be difficult. I would like to see Proposals 51 - 56 Rejected. I would like Proposal 59 to be rejected. Closing down the whole west side 63 consecutive hours every week is totally wrong on so many levels. There is already a pulse fishery in the Cape Alitak Section. Now they want to pulse the whole west side for one area. Proposal 65 would be a huge proplem. You would have huge costs in rebuilding seines. So many gilled fish in 4 1/2 inch mesh. The current mesh size in all Alaska Seine fisheries is 3 1/2 inches. Not 2 1/2 to 2 3/4 . Reject Proposal 65. Thank you for all the work you do.

Robert Funkhouser



Submitted By
Robert McDonnell
Submitted On
12/23/2016 1:04:42 PM
Affiliation
fisherman/permit holder

I am speaking out in opposition to any proposed changes to the Cape Igvak Managment Plan, specifcily proposals 51-56. I first fished the Igvak fishery in 1976 and have seen many regulatory changes. The current plan is working well. The proposals are not biology based and are only looking to cut Kodiak fishermen out of a historical fishery. The Igvak fishery is a very important component to a sucessful salmon season. Respectfully Robert McDonnell F/V Kulshan

Submitted By
robert
Submitted On
12/23/2016 1:20:45 PM
Affiliation
fisherman/permit holder

Phone
3602206339
Email
roddymcdonnell@yahoo.com
Address
230 shallow shore rd
Bellingham, Washington 98229

I am speaking out in opposition to proposal #59-changes to the Westside Managment Plan. Increasing limits to the tools the DF&G have to manage the fisheries only make that job harder. Thank you Robert Mcdonnell

I am speaking out in opposition to changes to the Ayakulik river mouth fisheries, proposals 62 and 63. The limited amount of time that fishery has been open is needed to harvest surplus reds and pinks. To blame the lack of king escapment on the limited rivermouth openings is misguided. Thank you Robert McDonnell

I am in opposition to the proposal to increase mesh size for seines in the Kodiak area. Changing to the mesh size proposed would do the opposite of the intended result. It would result in far more by-catch mortality of many species, including Kings and chums. More fish would be gilled and damaged before being returned to the water. Thank You Robert McDonnell



Submitted By
Ryan Horwath
Submitted On
12/27/2016 12:00:59 PM
Affiliation

Phone
510-316-7791
Email
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Address
po box 465
kodiak, Alaska 99615

I am a direct marketing fisherman who would like to see the current Black Rockfish rules stay in place. Having my rockfish marketed at small processors is limited by processing capacity. By taking out the mandatory 5 day no fishing period we are essentially opening up the market to be flooded by fish that will go to a larger plant who can accommodate the influx of more fish. As a result the overall ex-vessel price will go down and the directed season will close. Keeping a slow but steady supply of fish ensures small processors and direct marketers have access to black rockfish longer.

Also if the black rockfish quota all gets caught in the spring, it means the market has to wait until next year to have access to the fish, and for those of us who don't fish salmon, black rockfish can help finance our Jig operations all summer long when cod fishing usually slows down.

Date: December 8th, 2016

To: Alaska Board of Fisheries

ADF&G Boards Supports

P.O. Box 115526

Juneau, AK. 99811-5526



From: Scott Campbell Sr

Re: Support of proposal RC 40

I am a partner/ manager with my son in the fishing vessel Seabrooke which participates in the Bairdi fishery in the Bering Sea . I am writing in support of proposal of RC 40 which could potentially allow the Bering Sea District commercial Tanner crab fishery west of 166 to open for the 2016-2017 season. The last few years that our vessel Seabrooke has fished the Tanner crab fishery in the Bering Sea we have observed a steady increase in our CPUE especially in the Western district. In the 2015-2016 Western district Tanner crab season our vessel observed some of the most robust fishing that we have ever had over a very large geographical area. Our captain started out fishing just west of 56N & 166W and ended the season at just below 58N & 171.30W. He was able to observe a very healthy stock with a good mix of recruitment of small males, females and abundance of legal male populations which was reflected in this year's survey. The Tanner crab fishery has become a very viable and healthy fishery over the last few years which made up approximately 54% of our crew and vessel income. The economic loss to the vessels, crews, and companies associated with this fishery are very large do to the 2016-2017 Tanner crab closure and reduction of TAC's in the King crab and Snow crab fisheries. Our company made capital investments in purchasing quota in the Tanner crab fishery based on the health of the fishery we have observed while fishing and the continued increase in TAC's that have occurred up until this year. If a conservative TAC could be implemented for the Western Tanner crab district for the 2016-2017 fishing year, I feel that it would not be a substantial risk to the health of the fishery based on our at sea fishing observations during the 2015-2016 fishing season and given that the 2016 survey shows a mature male Tanner crab increase of 13% from the previous 2015 survey. The economic benefits to those dependent on this fishery for their lively hood should be important consideration if a fishery could be executed without imposing a substantial risk to the health of a resource that appears healthy and increasing in bio mass.

Thank you for your time in reading my comments and consideration of this proposal.



Sincerely,

Scott Campbell Sr

Scott Campbell Sr, Owner/Manager

F/V Seabrooke



Submitted By
Stephanie M Marshall
Submitted On
12/22/2016 12:10:32 PM
Affiliation
Commercial fisherman/permit holder

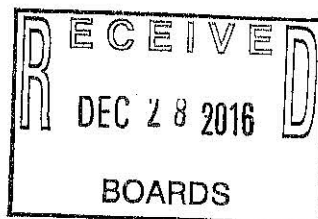
Phone
3606018937
Email
smmarshall89@gmail.com
Address
PO Box 1134
Kodiak, Alaska 99615

As a life long salmon fisherman, I think its important for Igvak to remain accessable to the Kodiak seine fleet. Kodiak has a large fleet with many recently dormant permits suddenly becoming active again, making it harder for the fleet to spread out. The last few years have been a struggle for most fisherman, especially the younger generation just buying into the industry. Having the oppertunity to fish Igvak has played a huge part in helping fisherman survive some of these harsher seasons. There is a reason Kodiak permits are the cheapest in the state, its hard enough as it is to make ends meet, so taking away more area is only going to make things worse. As a fairly new permit holder I would like to see this idustry survive, and thats not going to happen if the younger fleet cant even make their boat payments.



December 21, 2016

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



RE: Opposition to Changes in the Cape Igvak Management Plan

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the Cape Igvak Management Plan. Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to 15% of the total Chignik sockeye salmon catch. It also insured that Chignik area fishermen harvest a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36 year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of Chignik bound sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan.

Therefore, I ask the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56. Thank you for your consideration.

Respectfully,

Gordon Pullar
President



To the Chairman and members of the State of Alaska Board of Fisheries,

I am Timothy Murphy, 4th generation Chignik fisherman (will there be a 5th?), and resident of Chignik Lagoon. I am writing in my public comment as my job takes precedence over attending the conference in person. I have sat before the board over the past several years in support of proposals that would help create a stable economic condition whereas the Chignik salmon market is concerned.

I would like to offer my support for proposal 51, regarding a change in Cape Igvak regulation that would create language directing ADFG to implement management that will take into account survivability of the Chignik salmon fishery participants. As the proposer states, and it is a fact, if you allow BY REGULATION, ADFG management to guarantee the Chignik seine fleet the bare minimum harvest (300,000 for June and 300,000 more for July=600,000 total harvest) you regulate the end users of this resource into unsurvivable economic conditions. The fishermen of Chignik cannot survive on the numbers currently provided by the regulations, and the numbers SHOULD be changed to reflect modern fishery and economic times.

Proposal 51

In today's market conditions, short seasons, poor prices, and poor returns, this proposal being passed is necessary if for nothing less than an insurance policy for the entire Chignik region. As current Cape Igvak regulations stand, they are written with disregard to the terminal end users in Chignik, the allocation goal of 15% may be exceeded, and as seen on 2 separate occasions during the 2016 salmon season the Chignik Management Area was closed due to escapement and during these CMA closures the Cape Igvak area was not only open, but extended. This shows that the fishers in Chignik bear the sole burden of escapement, and are the ones that lose harvest opportunity where escapement is concerned. These regulations only work on behalf of the Kodiak seine fleet the word disregard is an understatement. Please remember, the sockeye fishery in Chignik is all we really have as far as harvest opportunity, we have to piece together a fishing season in far less time than our Kodiak counterpart has and they have far more systems and areas that produce harvestable salmon resources.

The sockeye runs traveling to Chignik are almost exclusively the only economic opportunity we have, no other species of salmon in the CMA has even the potential to provide harvest opportunity of an economic value to sustain the Chignik seine fleet. In comparison, the Cape Igvak intercept fishery is a bonus harvest opportunity granted to the Kodiak fleet. They have pink salmon runs that dwarf the returns of pink salmon to the CMA, and even with the Cape Igvak harvest removed from the equation Kodiak harvests more sockeye per year on average than their Chignik counterpart.

I hope it is time for board action to strengthen economic conditions in regards to the Chignik Sockeye fishery, to continue divvying up the small pie that this resource is will increasingly help to eliminate those who are able to participate in this fishery (Me).

Thank you,
Timothy Murphy

THE KODIAK DAILY MIRROR

Vol. 41 No. 122

Tuesday, June 23, 1981

25 cents

Chignik fishermen pull salmon gear

By CHRIS BLACKBURN
Special To The Mirror

Chignik salmon fishermen voluntarily stopped fishing Sunday maintaining that a cessation of fishing was necessary to protect the late red salmon run.

The Chignik Fish and Game Advisory Committee also strongly recommended, in a unanimously passed resolution, that red salmon fishing at Cape Igvak, which intercepts Chignik

bound red salmon, be closed until escapement goals for the late Chignik red salmon run are met.

The Chignik Advisory Board met Saturday and voted unanimously to close Chignik to salmon fishing from 6 p.m. June 22 to 4 a.m. June 24. The Advisory Board also asked all Chignik fishermen to voluntarily refrain from fishing June 20 and 21.

(Continued on Page 2)

AIFMA accepts price on Bristol Bay salmon

DILLINGHAM (AP) — The largest fishermen's marketing association in Bristol Bay has reached its first price agreement with a major processor.

The Alaska, Independent Fisherman's Marketing Association signed a contract

Beauty buys are fresh frozen, the price amounts to almost the same settlement for the independent group, which represents 700-800 fishermen, mostly from out of state.

Most of the other nine major processors deal primarily with



The 76-foot Shoshone, owned and operated by Nick Delaney, at the APS cannery in Kodiak.

MV Shoshone

179,000 lbs. of halibut in 1 load

By CRAIG BARTLETT

the early 70's attributed the

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Submitted By
Timothy Murphy
Submitted On
12/25/2016 2:48:23 PM
Affiliation
Alaskan Fisherman

In support of Proposals 51 through 56;

First, the "historical" intercept fishery at Cape Igvak, was enacted in 1978 to aid a poor salmon fishery in the Kodiak Management Area. The shoe is now on the other foot, so to speak, we in Chignik are the fishery in need of assistance in the form of regulatory change.

Chignik may be called a salmon fishery, technically, we do harvest all of the species of salmon, however the sockeye run is the one and only salmon resource present that is able to and it is only just enough to sustain the seine fleet in the CMA.

In an attempt to stave off any attacks against myself and those that participate in the Chignik sockeye fishery from being called greedy, or that we want to shut the Kodiak fleet down, or try and penalize the Chignik seine fleet for having a few good seasons in the past, I ask that they put themselves in my place.

Economic and biological conditions alone are enough of a threat to put many of the Chignik fishermen and women out of business, add interception and it becomes a perfect storm that can and will end up being enough to see many unable to any longer afford to participate in the Chignik fishery.

The stocks returning to the CMA are heavily intercepted from both sides of the area.

Chignik has no other viable salmon stocks of adequate surplus for us to target if we don't get the sockeye into the waters of the CMA. Whereas, the KMA has multiple systems and a healthy pink salmon hatchery.

The poor seasons are leading to participants unable to maintain their operations, provide a decent crewshare to keep crews wanting and being able to afford to come back to fish, and the outlook that it may not be worthwhile to re-invest in the future of the fishery.

Timothy Murphy



December, 23 2016

Mr Chairman and Members of the Board,

My name is Wesley Ashby I am a 4th generation Chignik resident. I am a single father supporting my 8 year old daughter. My income contributes to assisting my parents who care take my daughter during the fishing season and I also take care of my grandparents home maintenance and subsistence and hunting needs as well as firewood. I am a 6th year skiff man on a seiner in Chignik at the highest pay scale and I normally work for the city during the winter. As of late due to lack of a fish processor in Chignik the city does not have tax revenue in order to hire any one other than essential jobs. At this point the city is breaking up a single job amongst multiple people and I am now working a 40 hour week one time a month, which is not enough to even pay my rent. If I leave town to seek out work I either must leave my daughter with someone, because if I take her with me it will jeopardize the schools existence; or take her with me and pay for childcare while at any job that I do find as I have no family support anywhere but Chignik. I support for proposals 51 through 56.

Wesley Ashby

Wesley Ashby



Submitted By
Zach Hill
Submitted On
12/26/2016 4:29:44 PM
Affiliation

BOF Comments

Boards Support Section

Alaska Department of Fish and Game

P.O. Box 115526

Juneau, AK 99811-5526

RE: Kodiak Board of Fish

Dear Chairman Jensen and Board Members:

I appreciate the opportunity to comment on proposed changes to the the Kodiak Salmon fishery and the Cape Igvak Management Plan. I have been seining in Kodiak for almost 15 years, and have fished in many of those years, in the Cape Igvak section.

Before limited entry Kodiak and Chignik fishermen developed the Cape Igvak commercial salmon fishery as an important component to their respective fisheries. The Cape Igvak fishery continued to develop and expand after 1973 when fishermen were limited to a single registration area. In 1978, the Board of Fisheries established the Cape Igvak Management Plan, which balanced equity between Kodiak and Chignik fishermen by limiting Kodiak's Cape Igvak catches to approach as near as possible 15% of the total Chignik area sockeye salmon catch. It also insured that Chignik area fishermen have a targeted harvest of a minimum of 600,000 sockeye salmon before the Cape Igvak fishery opens.

The 36-year average allocation of Kodiak fishermen under the Cape Igvak Management Plan has been 12% of the total Chignik area sockeye salmon catch and the catch of sockeye by Kodiak fishermen at Cape Igvak has been less than the 15% allocation in 27 of the 36 years the plan has been in place. The Chignik biological escapement goals have been met throughout the time that the plan has been in place and therefore the plan does not threaten Chignik area biological escapement goals. The characteristics and number of participants in the fishery has not changed and furthermore Chignik fishermen continue to have larger average salmon fishing earnings by permit holder than Kodiak fishermen in addition to substantially higher permit values. Moreover both Kodiak and Chignik fishermen continue to enjoy the same alternative fishery resources and the benefits of biologically centered fishery management as directed in the Cape Igvak Management Plan. Fishermen from Kodiak's village communities are dependent on the Cape Igvak fishery and a far larger percentage of Kodiak salmon permit holders reside in the Kodiak area and Alaska than do Chignik area salmon permit holders. Additionally, the Chignik fishery has the luxury of being able to spread it's harvest out over a significantly smaller number of permits. In recent years, Chignik has only seen effort from between 55 and 76 permits while, the Kodiak harvest is split between upwards of 180 active permits (while almost 350 permits could possibly be fished). Lastly, there are no biological, economic or regulatory changes in circumstances that would justify changes to the Cape Igvak Management Plan. Therefore, I ask the Alaska Board of Fisheries not make changes to this plan by rejecting proposals 51-56.

Currently, seine mesh size is restricted to three and one half inch, stretched measure. In Kodiak, we are often fishing in shallow areas, in spots where an increase in net depth could dramatically damage gear and put our vessels and crew in dangerous situations. Additionally, changing mesh size on a net for a two-week period would be a very costly and time consuming endeavor, and could potentially place an undue financial hardship on fishermen. Currently with three and one half inch mesh, we are able to return King Salmon to the water un harmed during the month of June. An increase in mesh size, will greatly increase the number of fish that are caught or gilled in the net, some of them potentially small King Salmon that this regulation would try and protect that could otherwise be returned safely to the water. I urge the Alaska Board of Fisheries to reject proposal 62.

Additionally, as a commercial salmon seiner, I would like to support proposal 64, in the creation of a subsistence area near the village of Ouzinkie, to eliminate the potential for conflict over that resource, that is essential to the rural community of Ouzinkie. The area that is

requested is not a traditional area for seiners to fish, and any fishing that would occur in this area would be targeting the fish intended to be harvested by the village.



I also would like to urge the Alaska Board of Fisheries to reject proposals 62 and 63. Having the ability to open the Ayakulik to the stream terminus, is a tool that allows ADF&G the ability to ensure that over escapement does not occur in times of surplus. By eliminating that, the Board would effectively be removing that tool from the bag.

Thank you for your consideration.

Respectfully,

Zachary Hill

F/V Atlas

Kodiak Salmon Seiner



Board of Fisheries Public Comment – Kodiak Meeting, January 10 – 13, 2017

From: Chuck McCallum; Fishery Advisor, Lake and Peninsula Borough

Subject: Supporting background information for Proposals 51 – 56 concerning the Cape Igvak Management Plan.

In order to assist the Board and the public in understanding the intent of the Board of Fisheries when originally instituting the Cape Igvak Management Plan in 1978 & 79 the documents on the following pages are respectfully submitted:

- 1) Board of Fisheries Finding #78-38-FB: Cape Igvak Management Plan for 1978 season through July 25.
- 2) Board of Fisheries Finding #78-40-FB: 1979 Cape Igvak Management Plan
- 3) Board of Fisheries Finding #80-62-FB: The Cape Igvak Management Plan.
- 4) Transcripts from the Meetings of the Board of Fisheries (December 1977 and April 1978)

see also #78-40-FB,
#80-62-FB



PC68
2 of 16

ALASKA BOARD OF FISHERIES

CAPE IGVAK FISHERY MANAGEMENT PLAN FOR 1978 SEASON THROUGH JULY 25 #78-38-FB

The Board of Fisheries has adopted a new policy on the Cape Igvak sockeye interception fishery. The following conditions will be adhered to in the management of this fishery.

A. MAXIMUM ALLOWABLE CATCH

The overall percentage of sockeye catch at Cape Igvak will not exceed 15% of the Chignik sockeye catch through July 25.

B. OPENING DATES

- I. If the Chignik sockeye harvest forecast for both runs combined is less than 600,000 then no fishery will occur at Cape Igvak until such a time when a harvest of this magnitude at Chignik can reasonably be assured.
- II. If the Chignik sockeye harvest forecast for both runs combined is greater than 600,000 then the opening date could be as early as June 9. It will be based on escapement through the Chignik weir, estimated number of fish in Chignik Lagoon and projected early run harvest.

GUIDELINE FISHING DAYS (Provided that there is an opening at Cape Igvak.)

- I. June 9 to June 13: Fishing time will be day-for-day equal fishing time with Chignik as near as possible.
- II. June 14 to June 21: If the early run harvest forecast is above 400,000 and if the actual run appears to be sufficiently strong, fishing time will be one or more days at Cape Igvak for every day at Chignik. On an early run harvest forecast of less than 400,000, fishing time may be on a day-for-day basis as near as possible.
- III. June 22 to June 25: Fishing time may be day-for-day equal time with Chignik as near as possible.
- IV. June 26 to July 9: No fishery will occur at Cape Igvak during this early and late run overlap period.
- V. July 10 to July 13: Fishing time may be day-for-day equal time with Chignik as near as possible.
- VI. July 14 to July 21: If the late run harvest forecast is above 250,000 and if the actual run appears to be sufficiently strong, fishing time will be one or more days at Cape Igvak for every day at Chignik. On a late run harvest forecast of less than 250,000, fishing time may be on a day-for-day basis as near as possible.
- VII. After July 21: Fishing time may be day-for-day equal time with Chignik as near as possible. Later in July the fishery may be restricted further if pink and chum interception becomes too excessive.



At least a one day notice will be given prior to an opening unless it is an extension of a fishery in progress.

D. FISHING HOURS

- I. One day periods: 6:00 a.m. to 9:00 p.m.
- II. Two or more consecutive days: Continuous fishing from 6:00 a.m. on opening day through 9:00 p.m. on the closing day of the fishing period.

E. CONTINGENCY PLANS

The Department will follow the above plan as near as possible. The dates given in this management plan are based on average run performance. Adjustments of certain dates and figures may be made if it is determined that run timing and strength appear to differ substantially.



1979 CAPE IGVAK MANAGEMENT PLAN

*See also
#80-62-FB,
#78-38-FB*

On years when the harvestable surplus for both runs of Chignik sockeye salmon is expected to be less than 600,000 fish there will be no fishery allowed at Cape Igvak until such a time when a harvest of this magnitude at Chignik can reasonably be assured. The 1979 forecast is for a harvestable surplus of approximately 500,000 early run and 950,000 late run fish and a fishery at Cape Igvak is therefore expected in 1979. However, should the actual runs fail to develop as predicted the Cape Igvak fishery will be curtailed in order to allow the minimum catch of 600,000 sockeye within the Chignik area if there are that many fish available surplus to the escapement.

In view of the large forecast for 1979 the Department of Fish and Game will manage the fishery in such a manner whereby the number of sockeye salmon taken in the Cape Igvak fishery will approach as near as possible 15 percent of the total Chignik sockeye catch. The total Chignik sockeye catch is considered to be those sockeye salmon caught within the Chignik Management Area plus 80 percent of the sockeye salmon caught in the South Peninsula area between McGinty Point and Kupreanof Point plus 80 percent of the sockeye salmon caught in the Cape Igvak section of the Kodiak area. This allocation method will be in effect through July 25. The percentage at any time prior to July 25 may fluctuate above and below this figure. The first fishing period of the season at Cape Igvak will not occur prior to the first fishing period at Chignik. After July 25 fishing in the Cape Igvak section may be allowed on the basis of local stocks or specifically for sockeye salmon if the late run sockeye escapement has reached 200,000.

During the period of approximately June 26 to July 9 when the strength of the late sockeye run is not yet known, and when the percentage of Black Lake and Chignik Lake fish traveling through the Cape Igvak fishery is not known, very little fishing time, if any, will be allowed at Cape Igvak.

Fishing hours will be as announced by emergency order. At least one day notice will be given prior to an opening unless it is an extension of a fishery in progress.

ADOPTED: Juneau, Alaska
December 9, 1978

VOTE: 7/0

Nick Szabo, Chairman
Alaska Board of Fisheries



ALASKA BOARD OF FISHERIES

THE CAPE IGVAK SALMON MANAGEMENT PLAN

*See also #78-38-FB,
#48-40-FB*

On years when a harvestable surplus (the number of fish the Department determines not to be necessary for escapement) beyond the escapement goals for the first (Black Lake) and second (Chignik Lake) runs of Chignik River sockeye salmon is expected to be less than 600,000 there will be no commercial salmon fishery allowed in the Cape Igvak section until a harvest of 300,000 sockeye salmon in the Chignik area is achieved. After July 8, and after at least 300,000 sockeye salmon have been harvested in the Chignik area, the Department will manage the fishery so that the number of sockeye salmon harvested in the Chignik area will approach as near as possible 600,000 or more and the harvest in the Cape Igvak section will approach as nearly as possible 15 percent of the total Chignik sockeye salmon catch.

On years when a harvestable surplus beyond escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be more than 600,000 but if the first run fails to develop as predicted and it is determined that a total sockeye salmon harvest in the Chignik area of 600,000 or more may not be achieved, the Cape Igvak section commercial salmon fishery will be curtailed in order to allow at least a minimum harvest in the Chignik area of 300,000 sockeye salmon by July 9 if that number of fish are determined to be surplus to the escapement goals of the Chignik River system. After July 8, and after at least 300,000 sockeye salmon have been harvested in the Chignik area, the Department will manage the fishery so that the number of sockeye salmon harvested in the Chignik area will approach as nearly as possible 600,000 or more and the harvest in the Cape Igvak section will approach as nearly as possible 15 percent of the total Chignik sockeye salmon catch.

On years when a harvestable surplus beyond the escapement goals for the first and second runs of Chignik River sockeye salmon is expected to be more than 600,000 and the Department determines the runs are as strong as expected, the Department will manage the fishery in such a manner so that the number of sockeye salmon taken in the Cape Igvak section will approach as nearly as possible 15 percent of the total Chignik sockeye salmon catch.

The total Chignik sockeye salmon catch is composed of those sockeye salmon caught within the Chignik area plus 80 percent of the sockeye salmon caught in the East Stepovak, West Stepovak, Balboa Bay, and Beaver Bay sections plus 80 percent of the sockeye salmon caught in the Cape Igvak section. The harvest in the Cape Igvak section at any time prior to July 25 may fluctuate above or below 15 percent of the cumulative Chignik sockeye salmon catch.

This allocation method will be in effect through July 25. The first fishing period of the commercial salmon fishing season in the Cape Igvak section will not occur prior to the first fishing period of the commercial salmon fishing season in the Chignik area. After July 25 each year, commercial salmon fishing in the Cape Igvak section may be allowed on local Kodiak area stocks or specifically for Chignik River system sockeye salmon if the second run escapement has reached 200,000.

During the period from approximately June 26 to July 9, the strength of the second run of Chignik River system sockeye salmon cannot be evaluated. In



order to prevent overharvest of the second run, the commercial fishing in the Cape Igvak section will be disallowed or severely restricted during this period.

The Department shall announce commercial salmon fishing periods by emergency order. The Department shall give at least one day's notice prior to the opening of a commercial salmon fishing period unless it is an extension of a fishing period in progress.

ADOPTED: January 5, 1980
Anchorage, Alaska

VOTE: 7/0



Selected Board of Fisheries Transcripts on the Cape Igvak Interception Fishery Meetings of December 1977 and April 1978

January 1999

Transcribed and Submitted
by Chignik Seiners Association
Box 46, Chignik Bay, Alaska 99564



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<i>The Chair appoints a committee whose goal it is to 'resolve' the Cape Igvak issue that evening. Gordon Jensen is appointed Chairman of the committee and Nick Szabo says that he will be attending. The next morning Chairman, Nick Szabo, reports that while the committee discussed several options that the committee had failed to reach an agreement. Chairman, Nick Szabo, asks if anyone would like to make a motion to "adopt any particular concept". An unidentified Board member makes a motion to "adopt this concept", but fails to be specific about which concept he means, prompting Nick Szabo to ask if he is talking about option three specifying the 15% allocation. The Board member agrees. After a brief discussion during which one Board member expresses his opinion that he thought that the allocation was going to be 10% the motion goes to the vote. The Board votes four in favor two opposed and one absent to approve the concept and instructs staff to work on the details of the plan for discussion at the next meeting in the spring.</i>	
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<i>Jim Beaton expresses the belief that a 600,000 guaranteed sockeye harvest in Chignik would provide a strong economic base. 'Jimmy' Huntington states that he feels that the 600,000 guarantee is not enough and shows a one sided picture.</i>	
<i>Jim Beaton states that Kodiak people feel that Chignik is getting too rich and that they want a piece of the action. Jim Beaton is very sympathetic with the sacrifice that Chignik fishermen have gone through to build up the run but he says that other people have short memories about this. Jim Beaton concurs with Gordon Jensen and Calvin Fair in the opinion that the Kodiak fishermen's attitude toward sharing of the salmon resource is a one way street and that Kodiak fishermen wouldn't want to share if they were in Chignik's position. Jim Beaton says that while Kodiak has some good runs that they aren't seen as having a bonanza like some see Chignik having. Jim Beaton suggests that the difference between Kodiak income and Chignik income is great enough to trigger a limited entry problem that could result in the state giving or selling more Chignik permits that could expand the Chignik fleet to 150. He states that it is in Chigniks long term interest to give up this allocation now rather than end up with half later. Jim Beaton states that the Kodiak people have found a way to use the Board to get a piece of the Chignik action but hopefully a small portion and that if it gets out of hand he is willing to take a hard look at doing away with Igvak in the future. After having voted 4/2 in support of the concept of allocating 15% in December of 1977 the Board voted 6/0 at this meeting in April of 1978 to approve the management plan.</i>	



December 1977 **Board of Fisheries**

Public Testimony
Selected Transcription by CSA
From the Board Audio Tapes
Tapes # 35 & 36

Board members: Nick Szabo, Chairman - Kodiak , Jim Beaton - Juneau, Calvin Fair - Soldotna, Jimmy Huntington - Galena, Gordon Jensen - Petersburg, Ted Duncan - Anchorage, Herman Schroeder - Dillingham

TAPE 35 SIDE A

[376] Boris Kosbruk (Chignik): "Well, you have to realize that False Pass is somewhat of a historical fishery and that this mainland district was first fished in '64 and in effect get [unintelligible] about 1968. And another interesting point was that, correct me if I'm wrong Jack, but I think that there was a tagging program last summer in the west end of Kodiak. And uh, the only reason I know about this is that I, I asked them to recover two of them, but I think there was about twenty-seven recovered at Chignik. I heard somebody saying a few minutes ago that that was local stock, but how come I got twenty-seven tags in Chignik? [384] They're not only intercepting our fish in Cape Igvak and the mainland district, but they're also intercepting us in the West end of Kodiak. So.

[432] Jim Beaton: "Yeah, you're pretty well versed Boris. Either you or one of the staff could tell us. They're only tagging—supposed to be tagging studies we've had—we've only had one or so. But if the best data you have, you know, can you make an estimate roughly of what percentage *are* Chignik fish? Maybe Jack could answer that best. To have, you know, your best [?]."

Staff: "I think we've settled on eighty percent and this may be on the low end. It could be a lot higher than that. We calculate how many Chignik fish were interceptors. We utilize 80% because that's what we can derive from the tagging studies that we did in 1968 and 1969."

Nick Szabo, Chairman: "It's more conclusive data then, than say when False Pass does [unintelligible]. You're pretty comfortable with that 80% figure, isn't that right?"

Staff: "Well, the tagging studies that we did in 1969 are pretty conclusive. It was a good, good tagging study and I think it was supported by the 1968 tagging study, and then we followed it in 1970 by using some scale analysis, certain [circulli] count relationships and on more of a biological interpretation of the separation of the runs, and it completely supported the fact that they were Chignik fish. We certainly would have liked to have done more. We had more places that we had to put our money in other words, more higher priorities—or trying to get some answers in other places."

[450] Boris: "Mr. Chairman, I'd also like to point out that, of course I mentioned it, that they started in the Igvak area about 1964 and of course didn't get [unintelligible] until 1968. However, they started Kilokak rocks near Imuya Bay there, which is farther down our way, about five, six—six years ago? So, you know, they're really a new fishery and I think that they Board should really look at that.

TAPE #35 Side B – Ray Anderson (Chignik)



[363] And another thing – if you allocate, or whatever, a certain amount of fish to one group, you open up a whole new ball game here. This is not a historical fishery. I'll take it back to 1970 when the Board met in Cordova. It was the Board's desire at that time, they voted unanimously, to close the Cape Igvak Fishery down until July 21st. Well, the Kodiak fishermen got an injunction against the Fish & Game Board and the outcome was that – it wasn't that they had closed the season down that the judge was concerned about – it was the fact that it was improperly advertised. At that time I think you had to have a proposal 60 days on paper before you can act on it. Well, anyway, the judge said that it wasn't legal so everybody went fishing. [379]

TAPE #36 Side A

Tom Casey (Kodiak)

[146] I personally wouldn't be here today to ask you to risk the Chignik escapement to make the Kodiak fishermen rich. I am here instead to ask that you to consider an allocation of fish that will more evenly distribute the income from that valuable sockeye fishery over a greater number of people.

I agree with Jim Huntingtons statement yesterday when he said that, felt that, fishery resources of Alaska belong to everyone around the state and not just a few select people

I don't think that public resources that belong to all Alaskans should be cashed in by a very few and that's what has happened in Chignik right now....

[221] I think the goal of this board should not be to preserve this one sided distribution of public resource wealth but rather to build strong economies in Alaskas coastal towns this board should take a lot more even handed sharing of that salmon wealth...

[238] ...I think the least we can do is to share the income in a slightly more equitable basis rather than a four to one basis.

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December 1977  
Board of Fisheries  
Board Deliberations  
Selected Transcription by CSA  
From the Board Audio Tapes  
Tape # 65

Board members: Nick Szabo, Chairman - Kodiak , Jim Beaton - Juneau, Calvin Fair - Soldotna, Jimmy Huntington - Galena, Gordon Jensen - Petersburg, Ted Duncan - Anchorage, Herman Schroeder - Dillingham

Tape #65 Side A - Board Deliberation on Cape Igvak Proposal

[087] I was going to appoint Gordon Jensen chairman of the “Chigivak” committee (laughter) and uh if Gordon wishes there will be a room available up in the Ptarmagin room to have a Chigivak committee meeting this evening so what time would you like to meet with your committee?

Well, what time are you going to meet again?

Oh, I’m... well I thought we would probably...you know, if it was alright with you that we would meet tonight on that Chigivak thing and see if we can resolve that tonight and then we will be through with Westward area

OK lets met at seven then.

Ok the Chignivak committee is going to meet at seven in the Ptarmagin room...

[108] Meeting ends for the evening  
Minutes begin next morning with the roll call

Beaton, Fair, Huntington, Jensen, Ted Duncan is absent (?), Schroeder, Szabo,

Nick Szabo: Please note that a quorum is present – call the meeting to order. Well the .. we only have a couple of things remaining on the westward area. I don’t know if we made much progress on the Chigivak thing last night or not but uh there was a suggestion made that if the Board could agree on a concept on this Igvak thing it would give it to staff to work on and they could bring back a final plan in the spring meeting. It’s a pretty complicated management scheme, as everybody is probably aware by now. So, I don’t think we should spend a whole lot more time on this thing. I think its been hashed and rehashed enough be if we can agree on what we want to do, whether we want to leave it like it is or agree on some new management scheme or whatever why uh we can adopt that and move on to other things and let the staff have some time to work out the fine points.

[138] So, last night the last thing we were talking about that option three with the minimum catch as so forth and the 15% figure in there but we never had any, but we never took any, we never reached any agreement on it so would any care to uh move that we adopt any particular concept on this thing.



I move we adopt this concept

Are you talking about the option three, 15% 600,000 minimum catch at Chignik?

Yes

OK

Staff will work on this

Any discussion

Yeah I thought it was 10%

Oh well uh ----- Jim do you have anything

Jim: that 15%, that's an outer limit, is that the idea?

Yeah

That's a top limit?

[170] Nick Szabo: Yeah, I think the idea is that on the weak years there would be no fishing at all and on the good years, you know, there would be a little bit more I think that's the idea is that ... they would pull back drastically on the weak years then on the bigger years you know they'll you will be able to share a little bit on things.

So what you are saying is that on a year like this coming year the chances of even getting 15% are practically nil unless it's a really big year, right?

Yeah.

Well - on years of less than 1.3 there won't be any fishing at all.

Go ahead

Then 600,000 minimum catch is that locked into the concept also

Yeah

All those in favor of the concept raise your hand

One two three four [motion carried 4/2 (according to the tape log)]

All opposed

The concept is adopted

Ok Paul you've got something to do this winter

General laughter (189)



Ok uh I might as well dispense with proposal 92

Mr. Chairman I'm going to prop 104, the herring ...

Oh how about prop 92 let's get rid of that while its fresh in our minds (laughter)

Ok #92

(200) Allow 30% of the forecast at Chignik harvest between June 14 and July 20 to be taken by Kodiak fishermen at Cape Igvak and open the Cape Ivgak fishery on a day per day basis with Chignik after July 20.

Move to adopt

Second

There has been a motion to adopt and a second to adopt prop 92

Is there any discussion?

All those in favor

Opposed

Motion fails

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April 1978 Board of Fisheries

Board Deliberations
Selected Transcription by CSA
From the Board Audio Tapes
Tape # 51 & 52

Board members: Nick Szabo, Chairman - Kodiak , Jim Beaton - Juneau, Calvin Fair - Soldotna, Jimmy Huntington - Galena, Gordon Jensen - Petersburg, Ted Duncan - Anchorage, Herman Schroeder - Dillingham

Tape #51 Side A

[The Igvak Management Plan, having been approved in concept the previous December, is now being discussed for final approval. The staff has done considerable work on draft management plans but they have significant questions of the Board regarding their intent.] [As this transcription starts, the discussion is surrounding what the attitude toward the 15% allocation is. A guarantee? A target? Not to exceed? Are fishing periods set under certain conditions or are they guidelines so that management has flexibility?]

[402] Staff: I don't think there was any problem with the 'not to exceed 15%'. It was whether we were to allow the chips to fall where they may under these guidelines at anything under 15% or whether we were to strap them and try to achieve that 15% if we could. That was the problem. You see, as I recall there were some votes for anything from zero to five or ten and then what came up was 15% - not to exceed 15% was what was filled into that slot. Now this is what I would like to know.

Nick Szabo: Jim?

[414] Jim Beaton: Well, the whole figure of 15%, I always felt that ... the whole redeeming feature - I know I ... talked this over with Jack, Arne and staff, you establish that there is a viable economic need in Chignik and the village of Perryville for x amount of dollars, you know I mean to keep this thing going and that the Kodiak people are in a sense encroaching - though they developed this fishery over there and they are not encroaching on it - in all the other economic factors built into it - why it appeared that this 600,000 was a figure that they had to have as a base and by already guaranteeing them that I have to assume then that 15% figure is something that you would shoot for - I don't want to shake up the people in Chignik or anything - but I mean that they have a double safety figure built in there in other words they are going to get them all if it's a low run so to speak and it isn't, why the 15% would just be based just on excess and in that sense I can see trying to shoot for the 15% rather than hold it down to you know 5% or something like that because its going to be in excess they are already going to have a strong economic base before we even shoot for that 15% figure if I if I follow this all correctly. Is that not correct? (428)

[428] Nick Szabo: Well Yeah I think that's the way we --- you know, I looked at the thing to, was that the ... was that there would be no fishing at Cape Igvak on during these certain years where the harvest wouldn't provide at least 600,000 so they [Kodiak] were giving up fishing and in return they were getting pretty much a goal of 15% but not to exceed that amount, you know. But I guess that's has to be clarified then you can just view this day for day thing as just guideline fishing periods and that this would be what they [Kodiak] would expect you know how the fishing periods would go but



that this wasn't either a maximum or guaranteed minimum amount but that staff would be given the flexibility to manage to get the 15% at Igvak as near as possible.[435]

Tape #51 Side A [457] JimHuntington- So, all we are ensuring in Chignik is 600,000?

Nick Szabo: Well, at least that much.

That's all we're (pause) but (pause) This is a kind of one sided picture, looks to me like.

Tape #51 Side B [151-165] Jim Beaton: "Let's call it what it is. Kodiak people want it and they think that Chignik is getting too rich and some people in the State also concur with that idea. You know in the legislature and other places and we're trying to look at this fairly and allocate the catch recognizing that Chignik has went through all of these years of building up the runs and that they should get the bulk of the investment of that run. I'm a really strong proponent of that if that they are the ones that really suffered and built this thing up and these other people, we call them the Petersburg Vikings in our country, but up in this country, Kodiak people have come up with a way of trying to get a piece of that action on our value judgement they're claiming that they're going to get some portion of it, but hopefully a small portion. If this thing gets out of hand then I think we're going to have to take a hard look at just doing away with Igvak in the future."

[427] Jim Beaton: We have determined that 15% is what we think is a reasonable economic allocation to the people of Kodiak. Now you got to keep in mind that the people of Kodiak have got some good runs of their own over there but they don't have the really bonanza type thing, at least in some peoples mind, and I know that Boris will think well one good year doesn't make a bonanza thing and I recognize that but I mean that the people in Kodiak have got a good year coming up but the catch per boat isn't all that impressive and they are trying to spread a little bit of that effort over to Cape Igvak.... [433]

Tape #51 Side B [553] Gordon Jensen: I think one of the things that sort of bothers people a little bit is this business of sharing. I think sharing as far as some of these bigger (pause), like Kodiak and some of these others, is a one way street. I think if they were in the position of having to share with someone else, I am sure they would have the same argument. But I feel that the number we set is the important thing and how they arrive at it isn't that important.

Nick: Calvin?

Calvin: Mr. Chairman I agree with what Gordon Jensen just said.

Nick: Jim?

Tape #51 Side B [562] Jim Beaton: I concur with this thing about sharing and the monolithic structure of Kodiak has always been a kind of specter over everyone but the thing about the 15%, why I went for it in the first place, rather than just say "Chignik all the way boys and Kodiak can go over there and play with there own fish" is that I think there all overtones to this whole thing like the whole concept of limited entry and having 90 boats in an area that have a very lucrative fishery and that fishery gets up to a point of being in the minds of the people of the state a real sweetheart deal or whatever you want to call it, whether they sacrificed or not people have a very short memory about the sacrifice and stuff, they just look at things and they are basically jealous. That's life and that's just the way people are. But I think that if you don't do certain things to compensate for this such as this type of 15% allocation you are going to get into a realm of maybe they start allowing more people into that fishery. Or Limited Entry might, the way it's written it would re-negotiate



and come up with either a lottery program or a buy-in program or something where they would expand that fishery. That's the way the law is written. They expand it to maybe 150 boats or something. I think in the long haul, I think it's in Chignik's advantage to just give a little bit of a percentage on this catch rather than get half of what they are getting...[576]

Tape #52 Side A [388] Chairman, Nick Szabo: There has been a motion and a second to approve the plan with the changes indicated on the plan there. Is there any further discussion on the approval of the Igvak plan. All in favor raise your hand.

A little clarification, are we still working on the two days guarantee?

Chairman: Yeah.

Ok.

Chairman: Ok. Opposed. Adopted unanimously.