

On-Time Public Comment List

Statewide | March 20-24, 2017

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Adak Community Development Corporation

February 22, 2017

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

Re: Proposal 262

Dear Chairman Jensen,

Adak Community Development Corporation (ACDC) submitted Proposal 262 to create a management plan framework for WAI district tanners in a manner that generally followed the management framework the Board adopted for Adak Red King Crab, addressing: 1) Adak section boundaries, 2) registration requirements, 3) harvest strategy, 4) season dates, 5) pot limits 6) reporting requirements, 7) vessel size limits.

ACDC wishes to withdraw its support for proceeding with Proposal 262 at this time.

ACDC is working with ADFG to conduct an exploratory tanner crab fishery in the Adak area under a commissioner's permit. Depending on the results, ACDC may re-submit the proposal in a future cycle.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Koso".

Rick Koso, President
Adak Community Development Corporation
PO Box 1943
Adak AK 99546

Submitted February 24, 2017

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

Attn: Alaska Board of Fisheries

John Jensen, Chairman
Orville Huntington
Reed Morisky
Israel Payton

Sue Jeffry, Vice Chairman
Alan Cain
Robert Ruffner

Proposals: 255
Position: Support

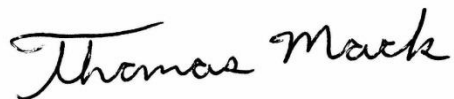
To the Members of the Alaska Board of Fisheries,

The Aleut Corporation is in support of proposal 255, which amends current regulation to allow a vessel operator who is registered to fish for Bering Sea Tanner crab *Chionoecetes bairdi crab* west of 166 ° W. long full retention of Bering Sea snow crab *Chionoecetes opilio*.

C. bairdi crab and *C. opilio crab* are similar in size and have similar biological traits. These two species also have a considerable overlap in distribution. Because of this boats targeting *C. bairdi crab* do incidentally harvest *C. opilio crab*. Because of their similar traits it is difficult to accurately and quickly differentiate *C. bairdi crab* from *C. opilio crab*, this increases the handling time to sort the two species which increases fishing operations.

Therefore, we ask that you support proposal 255, and allow a vessel operator who has an adequate amount of *C. opilio crab* individual fishing quota (IFQ) available, to retain any incidentally harvested legal male *C. opilio crab*.

Sincerely,



Thomas Mack
President
Aleut Corporation

Submitted February 24, 2017

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

Attn: Alaska Board of Fisheries

John Jensen, Chairman
Orivlle Huntington
Reed Morisky
Israel Payton

Sue Jeffry, Vice Chairman
Alan Cain
Robert Ruffner

Proposals: 262
Position: Support

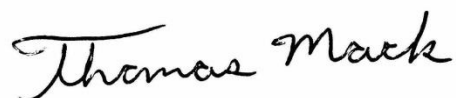
To the Members of the Alaska Board of Fisheries,

The Aleut Corporation is in support of proposal 262, which requests that a management plan for the Western Aleutian District commercial Tanner crab fishery is developed.

As stated by the proponent a management plan for the Western Aleutian District commercial Tanner Crab fishery is not fully complete. The framework requested by ACDC follows the management framework the Board adopted for Adak Red King Crab and assures that protections are in place so that the population is not over harvested and openings only occur if management determines there is a harvestable surplus.

Therefore, we ask that you support proposal 255, which develop a management plan for the Western Aleutian District commercial Tanner crab fishery.

Sincerely,



Thomas Mack
President
Aleut Corporation



Aleutian King Crab Research Foundation

Date: February 27, 2017

From: John Hilsinger, Science Advisor
Aleutian King Crab Research Foundation

A handwritten signature in blue ink, appearing to read 'JRH'.

To: John Jensen, Chairman
Alaska Board of Fisheries

Subject: Withdraw of support for Proposal #263

The Aleutian King Crab Research Foundation submitted proposal #263 regarding the shellfish onboard observer program for the Aleutian Islands golden king crab fishery. The purpose of this proposal was to clarify in regulation the ability to work with the department to ensure that adequate observer coverage is achieved, without unnecessarily exceeding the required levels, as has frequently happened. With a goal of 50% of the catch observed for each of the three trimesters of the fishery, and with the length of each trip, it has been difficult for harvesters to estimate their needs and the resulting coverage levels have exceeded the 50% requirement in recent years, sometimes going as high as 70%. Funding for observers and research both come from test fish funds. It is our goal to minimize the unnecessary use of these funds for observers and thereby maximize the availability of funds for research whenever possible.

After discussing the situation at length with department personnel, we believe that with better coordination and communication, it may be possible to correct this situation and actually get closer to the desired 50% coverage without the need for a new regulation. This would help reduce unnecessary cost for this program and funds would be available for cooperative research projects.

At this time, we would like to withdraw our support for this proposal. If you have any questions, please feel free to contact me by phone at 907-250-9240, or by e-mail at hilsinger1000@gmail.com. Thank you for your consideration of this request.



Petition In Support of Alaska Board of Fisheries Proposal 249

We, the undersigned, support the Alaska Board of Fisheries Proposal 249 – AAC 35.525. Lawful gear for Registration Area J.

The proposal is to establish 20 pot gear limit for vessels participating in the South Peninsula District commercial Tanner crab fishery and cap the total number of pots in the fishery at 1,000 pots, as follows:

Overall Limit 1,000 pots
Each-Boat-20 pots

- (A) That will give everybody a chance at the fishery
- (B) Help small boats, weather is an issue, safety is an issue

Crab are having a hard time coming back, a smaller pot limit will help everyone including the crab.

Name (Print):	Address:	Signature:
Paul K Gundersen	PO Box 100 Sand Point AK	Paul Gundersen
William Drenth	SAND POINT AK	William Drenth
Ben Mobek	SAND POINT AK	Ben Mobek
George P Gundersen	SAND POINT	George P Gundersen
MARTIN GUNDERSEN	SAND POINT AK	Martin Gundersen
PJ BROWN	SAND POINT AK	PJ Brown
DREW SPARLIN	SAND POINT AK	Drew Sparlin
RICK NICHOLSON	SAND POINT AK	Rick Nicholson
JAMIE MOBECK	SAND POINT, AK	Jamie Mobek
John Gardner III	SAND POINT AK	John Gardner III
RICK EASTLICK	SAND POINT AK	Rick Eastlick
Bruce Foster Jr	Unalaska AK	Bruce Foster Jr
Loren Gundersen	SAND POINT, AK	Loren Gundersen
Carl S. Carlsson Jr	SAND POINT AK	Carl S. Carlsson Jr
Jack Foster Jr	SAND POINT AK	Jack Foster Jr



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

From: Brian West
1000 Oceanview Dr
Anchorage, Alaska 99515



I am providing comments on the following

Alaska Board of Fisheries 2016/2017 Proposed changes in Lower Cook Inlet Finfish, Kodiak Finfish, Upper Cook inlet Finfish and Statewide King and Tanner Crab; and Supplemental Issues

Comments

Upper Cook Inlet Finfish

Proposal 34. Against. The proposer's argument is that since a lot of people break a rule it should be repealed. There is no logic in this. I take exception to his claim that 100% of private anglers party fish. I do not, nor do the people that I know. The proposer also indicates that it is too difficult to keep track of the fish he has caught. Again, this is no reason to change the rule. This proposal is basically a request to increase bag limits. Until such a time as the Fish and Game can justify increasing bag limits I suggest the proposer learn to count or at least take notes.

Proposal 144. Support if modified. The proposal is unclear. It states that the next legal bag limit must be kept. This will not solve the problem identified unless the bag limit is one fish. If the bag limit is three fish the person can just keep releasing fish and will not reach the bag limit. The proposal should be changed to read that "when proxy fishing, once a bag limit is taken the next legal fish must be retained."

Proposal 151. Support. A barbless hook is nothing more than a way to reduce the numbers of fish landed. If you have to hook and fight six fish to land one how is that good for the fishery?

Statewide

Proposal 267. Against. The estimated abundance level of 200,000 crab is too low to sustain the resource. This number is half of the long term average abundance level. However, the statistics used include numbers when the stocks were low or depressed due to overfishing. Using these lower numbers skews the abundance level down. The department has not had a good record for management of crab stocks in Southcentral. Viable fisheries for King, Tanner and Dungeness crab all existed, but, were destroyed by overfishing. The King crab fishery in Kachemak Bay is a prime example. The fishery was closed in the 70's reopened after a few years and then crashed forcing it to be closed once again. And it still has not recovered.

Proposal 268. Against. Same comments as for proposal 267.

Proposal 269. Against. The proposer indicates that the fish and Game does not have data from the area. How can a fishery be contemplated when no data exist as to the abundance of the resource?

Proposal 270. Against.



**CITY OF CORDOVA, ALASKA
RESOLUTION 02-17-06**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CORDOVA, ALASKA,
SUPPORTING REINSTATEMENT OF PRINCE WILLIAM SOUND CRAB AND
OTHER HISTORICAL FISHERIES AND THE DEVELOPMENT OF NEW FISHERIES
AND MARICULTURE, EMPHASIZING BENEFITS TO FISHERMEN, PROCESSORS,
AND LOCAL ECONOMIES WHILE SUSTAINING THE RESOURCE FOR YIELD**

WHEREAS, fisheries play the central role in Cordova and the region's economy and subsistence lifestyle; and

WHEREAS, the role of crab fisheries in particular has been absent from Cordova and the region's economy for three decades; and

WHEREAS, the goal of the State of Alaska's Policy on King and Tanner crab resource management, established by the Board of Fish (BOF), is to *"manage king and tanner stocks in a manner which will protect, maintain, improve, and extend these resources for the greatest overall benefit to Alaska and the nation"*; and

WHEREAS, a key benefit of achieving the goal is *"providing a sustained and reliable supply of high quality products to the industry and consumers which will provide stable and substantial employment in all sectors of the economy relating to these fisheries"*; and

WHEREAS, achieving these departmental and socioeconomic goals and benefits necessitate sound stock assessment methodologies; and

WHEREAS, the ADF&G appears to undervalue the role of commercial crab fisheries in Prince William Sound as a stock assessment tool; and

WHEREAS, the ADF&G and the BOF has, for numerous years and board cycles, rebuffed all attempts by various individuals, groups and other entities to achieve the stated policy goals in Area E though the use of commercial fisheries for stock assessment methods; and

WHEREAS, after making significant progress by collaborating with Area E stakeholders to move toward a tanner crab pot fishery to better measure and manage the resource, the ADF&G has returned to relying exclusively on trawl surveys for crab stock assessment, a method which is widely criticized as inadequate, flawed, and destructive of the resource; and

WHEREAS, the ADF&G has instituted a subsistence fishery which is prohibitively expensive to pursue because of the extremely small daily harvest limit of crab to local residents, and increased size limits for retained crab, which provides confusing stock statistics from subsistence harvest to the ADF&G.




NOW THEREFORE BE IT RESOLVED that the City Council of the City of Cordova, strongly supports subsistence crab and other fisheries which minimize expense to fishermen, maximize benefits to local and regional residents, and provide clear and accurate stock assessment data to the ADF&G.

BE IT FURTHER RESOLVED that the City Council of the City of Cordova supports the use of commercial fisheries as a stock assessment tool, supports the elimination of trawls as a method for crab stock assessment in Prince William Sound, supports Board of Fish proposal 268, and supports a crab management plan which provides for a sustainable harvest level at a biomass that currently exists rather than historical high harvest thresholds before a fishery is allowed.


PASSED AND APPROVED THIS 15th DAY OF FEBRUARY, 2017





Clay R. Koplín, Mayor

ATTEST:



Susan Bourgeois, CMC, City Clerk



BERING SEA/ALEUTIAN ISLANDS CRAB OBSERVER OVERSIGHT TASK FORCE

Date: February 27, 2017

To: John Jensen, Chair
Alaska Board of Fisheries

From: Linda Kozak, Chair

Subject: 2017 Report to the Alaska Board of Fisheries
With Recommendations

The Bering Sea/Aleutian Islands (BSAI) Crab Observer Oversight Task Force (COOTF) was formed by the Alaska Board of Fisheries in 1999 and consists of crab industry stakeholders and representatives. The COOTF is charged with interacting and acting in an advisory capacity to the Department of Fish & Game, as well as to report to and be advisory to the Board of Fisheries on the state managed BSAI crab observer program.

In 2014 the Board approved the membership of the COOTF to be nine to 15 individuals and currently there are eight industry members of the COOTF

The purpose of the COOTF is to review and recommend specific action for all aspects of the BSAI crab observer program as found at 5ACC.39.645, including the following:

- Funding mechanisms for observers
- Budget and reserve priorities
- ADF&G suggested program receipt requests

The COOTF meets annually with ADF&G to review reports on the previous year's deployment of observers, along with budgeted and actual costs of the program. The COOTF also reviews and comments on department recommendations for deployment and funding for the program through the test fish receipt authority. Any proposals regarding the observer program are discussed as well.

The BSAI crab observer program is funded through Legislative approved test-fish funds and federal crab rationalization funds. Each of the BSAI crab fisheries has a mandated percentage of coverage which provides the department with necessary information to manage the fishery. In 2016 the department conducted two test fisheries to help fund the observer program, with \$800,000 being received from the harvest and sale of Bristol Bay red king crab and \$300,000 from the Aleutian Islands golden king crab resource.



COOTF 2017 Report to the Board of Fisheries
February 27, 2017
Page Two

The COOTF does not have recommendations on any of the BSAI crab fishery proposals before the Board at the March 2017 meeting, but there are recommendations regarding the continuation and makeup of the task force.

RECOMMENDATIONS:

1. The members of the COOTF recommend and request consideration by the Alaska Board of Fisheries to approve the continuation of the task force.
2. The members further recommend that all current members of the COOTF be reappointed for a term of three years. In the event the Legislature changes the cycle of Board meetings, the terms would not expire until the next statewide shellfish meeting.

Those individuals are listed below:

Jerry Bongen – FV Pacific Venture
Doug Wells – CP Baranof
Edward Poulsen – FV Patricia Lee
Lance Farr – FV Kevleen K
Craig Lowenberg – FV Arctic Lady
Mark Henkel – FV Erla N
Jeff Stephan – United Fishermen’s Marketing Association
Linda Kozak – Golden King Crab Coalition

3. The COOTF members are requesting that two additional individuals be named to the task force with the same term as current members. Those individuals are listed below with a short summary of their background.

Tyson Fick – Executive Director, Alaska Bering Sea Crabbers

Since December 2016, Tyson has been ED of the Alaska Bering Sea Crabbers. Prior to that, he was Communications Director for ASMI. He has worked in several fisheries and lived in many regions of the State. He currently resides in Juneau with his family.

Matt Robinson – Fisheries Quota Manager, Bristol Bay Economic Development Corp.

With an MA in environmental policy, Matt’s experience includes six summers as a technician for ADF&G based out of Fairbanks. Following graduation he was selected as an Alaska Sea Grant Fellow working at the North Pacific Fishery Management Council where a focus of his energy was to review and analyze the federal groundfish observer program. Matt brings a level of expertise and knowledge to his current position with BBEDC and would be an asset to the COOTF. He lives in Anchorage.



Submitted By
Jeff Hathaway
Submitted On
12/21/2016 12:31:31 PM
Affiliation
Owner and Operator

I am writing about the Bairdi crab stocks in the Bering Sea. I own the F/V Determined, and am Captain of the Destination. I fished bairdi tanner in 2015, and 2016. I have operated crab vessels in these waters since 1985. We fished right up to the closure this year on March 31. In the areas we fished, I have never seen better fishing, over an extended area. We were seeing all sizes of crab, both male and female bairdi.

During King Crab in October 2016, we were fishing between 162 degrees w. longitude to 164 w. longitude and were consistantly seeing female bairdi in our pots.

With the large sanctuaries that are closed to pot fishing for bairdi, all waters east of 163, and the Blue Crab savings area in the Pribilof Islands, the risk of overfishing these stocks is greatly reduced.

I'm urging the Board to open Baidi in 2017, and perhaps re-write the regulations that would close the season for two more years.

The F/V Determined, home ported in Sand Point, Alaska, will be tied up if there is not a fishery in 2017.

Sincerly, Jeff Hathaway



Board of Fish Comments

Proposals 275 and 276: Kwethluk Incorporated is in opposition of these proposals which are not a customary practice of the people of the lower Kuskokwim River. If proposal 275 is going to become an up river down river issue, it will create more grievances. I have heard differently when people of upriver talk that they have caught more chinook and those in meetings say that they have not caught enough. In proposal 276, if it is going to be equitable, it does not provide numbers for additional family members in the house as far as catch limits. These two proposals should not be passed.

Board Generated Proposal 38: Kwethluk Incorporated is not in support of this proposal. In most of the Board of Fish meetings, people from this area and upper Kuskokwim river have been trying to increase the size from 4" to 5 1/2" or 6" to catch Chee fish or larger white fish (Broad heads and Cisco). Kwethluk Incorporated would be for this proposal if an amendment was made.

Board of Game Comments

Proposal: 21: Kwethluk Incorporated is in opposition of this proposal which suggests that those individuals who reside in Goodnews Bay and Platinum be the only ones to hunt in January 1-31, and yes, not all hunters of the Village of Kwethluk were successful either and yes, we do have more than enough cows and calves within our area too.

Proposals 22 and 23: Although Kwethluk Incorporated would like to have winter hunting season for Moose, we feel that we have sacrificed enough and do not want any Non-Resident hunts to be considered yet within this part of Unit 18.

Proposals 24 and 25: Kwethluk Incorporated is in opposition of bear bait stations, our people have hunted bears successfully without having to comply with restrictions of having bear bait stations and hunting bears both black and brown are not considered sports for our people. A separate restrictive regulation for sports hunters is recommended and needs to be closely monitored by the department for sports hunters follow. Kwethluk Incorporated is also in opposition of proposal 25 which would restrict the very people that rely on caribou and which will later on make our people criminals on our own land.

Chariton Epchook, Kwethluk Inc.



Alaska Board of Fish & Game

Re: Board of Fisheries Statewide Crab – Reinstating Reasonable Crab Pot Limits

Attn: Taryn O'Connor-Brito, Board Support Section

P.O. Box 1030; Dillingham, AK 99576

Tel: 907.842-5142 Fax: 907.842-5514

Taryn.oconnor-brito@alaska.gov

February 22, 2017

Dear Board of Fisheries members:

My name is Ludger Dochtermann of Kodiak, and I own two crab vessels, the F/V Northpoint and F/V Stormbird. Like all others in the fleet, we are deeply affected by the recent sinking of the F/V Destination off St. George Island and the loss of her entire crew. The Stormbird is also fishing out of St. George this season.

It is obvious that icing played a large part in that sinking, and word is that the vessel had an excessive number of pots aboard at the time. Tarps were ripped off and found among the flotsam along with buoys and a life ring. The weather at the time made for severe conditions and risky business.

It is challenging to parse between proposals, regulations, and policy, and just plain duty. The IFQ fisheries were instituted for privatization; and a federally imposed IFQ system came into being without NPFMC and U.S. Senate testimonies by vessel architects, load-line engineers, USCG safety officers, insurance experts and experienced captains discussing the specific concerns of safety. Safety began to improve when the earlier CDC NIOSH efforts on dockside inspections were instituted – not by IFQs.

What IFQs did was take most of the boats off the waters, statistically warping incident counts, while not reducing the total number of pots. Under the resulting cavalier attitude of "let them have as many pots as they want," vessels often now use hundreds upon hundreds of pots. I've been displeased by this practice, believing the total number of pots per vessel should be restricted by pot limits, as before IFQs.

At this point, given the reminder in the recent tragedy, I believe that this one falls under your mantle of duty, and obligation for policy that backs the NIOSH effort, not one that feeds the IFQ enrichment model. The Board can send a message regarding the best conduct of fishing practices, as remembrance that the lives aboard are worth far more than crabs. Please institute lower, reasonable pot limits again.

Sincerely,

A handwritten signature in cursive script that reads "Ludger W. Dochtermann".

Ludger W. Dochtermann

F/V STORMBIRD, F/V NORTH POINT

P.O. Box 714; Kodiak, AK 99615-0714

Telephone: 907-486-5450 — Cell: 206-245-5153 — Fax: 907-486-2272



**PACIFIC NORTHWEST CRAB INDUSTRY
ADVISORY COMMITTEE (PNCIAC)**

Lance Farr, Chair
8941 179th Place SW
Edmonds, Washington 98040
fffish@hotmail.com
C 206 669 7163; F 425 776 9894

February 25, 2017

Mr. Glenn Haight, Executive Director
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 9981

Re: PNCIAC recommendations to Board of Fisheries Proposals 250-261

The Pacific Northwest Crab Industry Advisory Committee (PNCIAC) is the Alaska Board of Fisheries (AKBOF) and North Pacific Fishery Management Council (NPFMC) designated non-resident industry advisory committee, representing industry participants from Washington and Oregon. It was established in 1990 at the time that the Bering Sea and Aleutian Islands King and Tanner Crab Fishery Management Plan was approved by the Governor of the State of Alaska, followed by the Secretary of Commerce. PNCIAC has balanced representation of harvesters and processors. PNCIAC since its beginnings, has worked with the Board of Fisheries, ADF&G, the NMFS, and the NPFMC. Together, PNCIAC and the agencies have worked together to improve resource management.

Proposal 250 PNCIAC supports proposal 250, it will reduce bycatch mortality by allowing retention of opilio that would otherwise be discarded. There is a 30% mortality rate on discarded opilio that is reflected in the Overfishing Limit (OFL) when setting the Total Allowable Catch (TAC), allowing opilio to be retained could have the effect of an increase in the TAC. This is a tool that industry could use to meet one of the goals of Crab Rationalization Program and National Standard 9 of the Magnuson Stevens Act (MSA). It does not make sense to catch a crab and release it back to the ocean only to return and catch the same crab two weeks later. Regarding proposals 250, 255 and 256, PNCIAC acknowledges logistical challenges unique to each plant involved with processing two species of crab from the same delivery. Especially in the case of bairdi bycatch in a red king crab delivery wherein switching processing back and forth between the two disparate species may be impractical. PNCIAC agreed that these challenges would need to be overcome through cooperation between processors and harvesters to achieve the goal of reducing bycatch mortality by allowing retention of crab that would otherwise be discarded. The harvesters of PNCIAC would like this tool available to them. This is an important concept from a management perspective because this proposal will reduce bycatch mortality by allowing retention of opilio that would be discarded while also improving fleet efficiency.

Proposal 251 PNCIAC supports this proposal to extend the bairdi season from March 31 to April 15. Harvesters fishing past March 31 have been catching bairdi in their pots but must discard them due to the season closure. Proposal 251 would allow bairdi crab to be retained if the harvester has Individual Fishing Quota (IFQ) for bairdi crab. This is a tool industry could use to meet one of the goals of Crab Rationalization Program and National Standard 9 of the Magnuson Stevens Act. Reducing discards and promoting efficiency in fishing are important concepts from a management perspective. The March 31 date was established to protect molting and mating bairdi throughout the Eastern Sub district during the spring but this information about molting and mating is from the Gulf of Alaska and not the Bering Sea. Observer data from the Bering Sea snow crab fishery shows very little amounts of crab being taken by pot gear in these sensitive life stages.

Proposal 252 and 253 PNCIAC supports both proposals. They will increase efficiency of harvesters by allowing them to rig, bait and set pots for a different fishery before fully exiting the crab fishery for which the vessel is validly registered, with or without an observer on board. Hauling empty pots, as some fishermen jokingly call



“practice pots,” is a cost to crew and the boat, with increased fuel and time spent moving and rigging those pots. The more pots hauled increases the chance of an injury and causes greater wear on vessels and fishing gear.

An observer is a representative of the department and should change the current Shellfish Onboard Observer Program so the vessel with an observer can rig and set baited gear for a new target fishery before they offload the crab onboard. This is a restrictive regulation that has no benefit. This change should not affect ADFG’s ability to monitor and record fishing effort and catch data. This proposal should not change the department’s ability to manage the fishery.

Proposal 254 PNCIAC does not support this proposal as written and would prefer that hybrid crab delivered as opilio. The reason PNCIAC does not want hybrid crab to be sold as bairdi is because they don’t taste like a true bairdi and might harm the market. Bairdi sell for a premium to opilio because of their unique flavor profile and wants to protect the existing market preference for bairdi.

PNCIAC also would like to see hybrid crab addressed in the harvest strategy, Hybrid crab are not accounted for in stock assessment or harvest strategy of either bairdi or opilio. Not being accounted for in the Total Allowable Catch (TAC) hybrid crab become a buffer, making harvest strategies more conservative. PNCIAC feels harvesting hybrid crab as opilio, hybrid crab should be accounted for in the opilio harvest strategy.

Proposal 255 PNCIAC supports proposal 255, it will reduce bycatch mortality by allowing retention of opilio that would be discarded. Also, there is no directed fishery for opilio east of 166 W, so when harvesters are fishing bairdi that would be the only time to catch opilio in this area. There is a 30% mortality rate on discarded opilio that is reflected in the OFL when setting the TAC, allowing opilio to be retained would have the effect of an increase in the TAC. This is a tool industry could use to meet one of the goals of Crab Rationalization Program and National Standard 9 of the MSA. As with proposals 250 and 256, proposal 255 will require processors and harvesters to work together to make it work and harvester members of PNCIAC would like this tool available to them.

Proposal 256 PNCIAC supports this proposal, there is a 50% mortality rate on discarded bairdi that is reflected in the OFL when setting the TAC, allowing bairdi to be retained would have the effect of an increase in the TAC by not having to discard bairdi and come back a week later and catch them. This meets the goals of the Crab Rationalization Program and National Standard 9 of the MSA. Also, east of 163W is closed to directed bairdi fishing, being able to retain bairdi while fishing in that area for Bristol Bay red king crab would help spread out the harvest of bairdi. As with proposals 250 and 255, proposal 256 will require processors and harvesters to work together to make it work and harvester members of PNCIAC would like this tool available to them.

Proposal 257 PNCIAC has reservations with this proposal as it would overlap the boundary lines of Eastern bairdi and opilio crab fisheries. That said, PNCIAC did not take an official position on this proposal.

Proposal 258 PNCIAC does not support this proposal, the 163West longitude boundary line was set to protect Bristol Bay red king crab and feels that protecting these crab is a valid reason and should keep the line at 163 West.

Proposal 259 PNCIAC supports the escape rings and mesh for St Mathew Island blue king crab. PNCIAC believes sorting on the bottom is good stewardship of the resource.

Proposal 260 PNCIAC supports ADFG adopting a quick reference guide but would like the guide refined.

Proposal 261 PNCIAC is supportive of the proposal but believe proposal 255 would be a better way to address enforcement problems.



PNCIAC supports the Board of Fish having a special meeting to address the bairdi crab harvest strategy. PNCIAC fully supports a meeting to occur in June so that an updated harvest strategy would be ready for next year's TAC setting.

Thank you in advance for your consideration,

Regards,

A handwritten signature in blue ink, appearing to read "Lance E. Farr".

Lance E. Farr, Chairman
PNCIAC



Submitted By
Timothy Murphy
Submitted On
1/15/2017 1:13:59 PM
Affiliation
Fisherman

To the chairman and members of the State of Alaska Board of Fisheries;

I am Timothy Murphy, a lifelong Chignik fisherman.

I write to comment and represent opposition to proposal 249, placing limits on pots on vessels as well as a cap of overall pots on the fishery.

First, we had proposals similar to this submitted in our area to limit the ability of fishermen to be efficient. Reduction in pots, reduction in fishing time, etc.

I would not like to see this become a precedent in regulation.

The author(s) cite safety, and weather as reasons for this measure, and to help small boats compete.

This would penalize those who made the investment into larger vessels, weather and safety are part of the job as fishermen, they will always come into play and making fishing vessels less efficient could have the opposite effect on safety.

The processors want product to process in as efficient quantity they can get, an fishermen want to be able to harvest the resource as efficiently as possible to get in out of the weather asap.

I am opposed to this unless there is a biomass issue that would require a lower gear limit or overall cap on gear for a fishery.

Thank You,

Timothy Murphy

Tuntutuliak Traditional Council
PO Box 8086
Tuntutuliak, Alaska 99680
Ph: (907)256-2128, Fax (907)256-2080



OPPOSITION TO PROPOSAL 275

WHEREAS, the Native Village of Tuntutuliak is a federally recognized Tribe under the Federal Government, and,

WHEREAS, the Tuntutuliak Traditional Council is a Tribal Entity organized for the purpose of leadership and program operations for the Village of Tuntutuliak, and,

WHEREAS, the State of Alaska, Fish & Game, is considering Proposal 275, a Tier II Salmon Fishing Permit System within the Unit 18 Subsistence Management Area, and,

WHEREAS, this Permit System is in contrast to the Customary and Traditional practices of the Tribal Residents in the Kuskokwim River System, and,

WHEREAS, this Tier II Permit System will leave out Eligible Subsistence Families from participating what had supported them all their lives, and,


WHEREAS, this will not be fair to Residents that had participated in seasonal Subsistence Fishing, and,

NOW THEREFORE BE IT RESOLVED THAT, the Native Village of Tuntutuliak, through Organizational Joint Meetings, do hereby OPPOSE Proposal 275, as it will not benefit All Residents participate in a System that is Their Livelihood.


CERTIFICATION

PASSED AND APPROVED BE A CONSTITUTED QUORUM OF THE TUNTUTULIAK TRADITIONAL COUNCIL ON THIS 25th DAY OF OCTOBER 2016, BY A VOTE OF; 5 IN FAVOR, 0 OPPOSED, AND 0 ABSTAINING.

ATTESTED:



Johnnie Evan, President



John Fitka, Secretary
John Fitka

Tuntutuliak Traditional Council
PO Box 8086
Tuntutuliak, Alaska 99680
Ph: (907)256-2128, Fax (907)256-2080



**OPPOSE PROPOSAL 276: REGULATE KING SALMON SUBSISTENCE
DURING TIMES OF LOW KING SALMON ABUNDANCE**

WHEREAS, the Native Village of Tuntutuliak is a Federally Recognized Tribe under the Federal Government, and,

WHEREAS, the Tuntutuliak Traditional Council is a Tribal Entity organized for the purpose of leadership and program operations for the Village of Tuntutuliak, and,

WHEREAS, the Alaska Department of Fish & Game, is considering Proposal 276, to Regulate king salmon subsistence during times of low king salmon abundance, and,


WHEREAS, the Sovereign Tribes have an avenue to Federalize the Kuskokwim River, through ANILCA of 1980, Section 804, during times of low abundance, and,

NOW THEREFORE BE IT RESOLVED THAT, the Native Village of Tuntutuliak, through Organizational Meetings, do hereby **OPPOSE** Proposal 276, as there is already in place for the Tribes to exercise.


CERTIFICATION

**PASSED AND APPROVED BE A CONSTITUTED QUORUM OF THE
TUNTUTULIAK TRADITIONAL COUNCIL ON THIS 25th DAY OF
OCTOBER 2016, BY A VOTE OF; 5 IN FAVOR, 0
OPPOSED, AND 0 ABSTAINING.**

ATTESTED:



Johnnie Evan, President



John Fitka, Secretary
John Fitka



Aaron Anderson

Box 43
Chignik Lagoon, AK 99565

November 9, 2015

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

Dear Board Members,

I am a life long resident of Chignik Lagoon. I provide for my family by commercial fishing for Salmon and Pacific Cod in the Chignik area.

I support proposals 1 and 2. I feel that they would increase economic opportunity for local boats who are invested only in the salmon fishery. These proposals would not take away from the boats who have invested in the P. Cod fishery as the Jig quota has remained unharvested, pre roll over date, for years.

I am strongly opposed to proposal 3. There are many local residents who have invested in the P. Cod fishery for years. It would be unfair to take away quota from those who have invested in the fishery and give it to those who have not. As I'm sure you have heard many times, Chignik is a small boat fishery. Chignik Lagoon is very shallow and the local boats are built shallow to fish it. One common misconception is that the length of a boat reflects its size. While length is considered criteria, one must also consider draft. Shallow draft boats cannot handle the weather that deep drafted boats can. Stability of a boat is directly related to the relationship of the amount of boat out of the water versus the amount of boat in the water. If this proposal were to pass, the local, shallow draft boats of Chignik would lose out to the non-local, deep drafted boats.

I am opposed to proposal 4. This proposal will slow the fishery down too much. As the proposer states in the proposal, weather plays a huge factor for the local shallow draft boats of Chignik. As everyone will agree, weather can be very unpredictable especially during the winter and early spring. Storms during this time of year occur frequently. There are times when the only time you can get to your gear is at night, in between storms. If the times that we can fish is restricted to a few hours during the day, fishers would take more risks in order not to miss a fishing period.

I support Proposal 5. As the proposal states "the fall rollover fish has gone unharvested with limited participation." By removing the gear restrictions, we would increase the economic viability of the fishery.



I don't have a problem with Proposal 6. There is plenty of opportunity for local fishers to harvest the roll over fishery before the October 30th date in the proposal.

I support Proposal 7.

I strongly oppose Proposal 8. Cod are more spread out during the federal fishery. Any more restrictions on the amount of gear a fisher could use will severely impact the economic viability of the fishery.

I strongly support Proposal 9. Chignik is unique when it comes to the Stellar Sea lion restrictions. We have very little area inside three miles that can be fished during the parallel season. Most residents of Chignik did not qualify for a P. Cod endorsement on their LLP, therefore they are restricted to state waters. By opening the closed waters around haul outs to pots and jig within state waters, the State will increase opportunity to local fishers without jeopardizing Stellar Sea lions.

Thank You,

Aaron Anderson

F/V Arianna Sage



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668
November 10, 2015

Tom Kluberton, Chairman
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Mr. Kluberton:

The National Marine Fisheries Service, Alaska Region (NMFS), appreciates the opportunity to comment on the proposed changes to management of the State of Alaska (State) Pacific cod fisheries that the Alaska Board of Fisheries (Board) will be addressing at its meeting in Anchorage on November 30, and December 1, 2015.

If adopted, three of the proposals (Proposals 10, 11, and 15) would increase State Pacific cod guideline harvest levels (GHLs) that would require changes in Federal management to ensure that total harvests of groundfish species under State GHL and Federal fisheries would not exceed the acceptable biological catch (ABC) limit for Pacific cod. We would accommodate any increase in State Pacific cod GHLs by reducing the Federal total allowable catch (TAC) limit in the appropriate area so that total allocation of the State GHL and the Federal TAC does not exceed the ABC in that area. This is the current process we use to accommodate State GHL fisheries. If the Board recommends increasing the Pacific cod State GHLs in one or more areas at its upcoming meeting, NMFS would revise its Federal TAC limits in that area so that the revised TAC limits would be effective beginning on January 1, 2016.

We have additional comments on Proposals 1, 9, 10, 11, 14, 15, and 18, which have implications for Federal fisheries or management.

Proposal 1: Add purse seine gear as an additional gear type to share the 10 percent jig allocation in the Chignik Area State-waters Pacific cod fishery.

Although this proposal would not affect Federal fisheries, NMFS would need to coordinate with the State to revise our Interagency Electronic Reporting System, eLandings system, to allow for the reporting of groundfish by seine gear.





Proposal 9: Reduce waters closed for the protection of Steller sea lions during the parallel Pacific cod fishery in the Chignik Area.

This proposal would repeal closures to fishing for Pacific cod with pot gear in Steller sea lion critical habitat from 0 to 3 nm around the Sutwik Island, Lighthouse Rock, Spitz Island, and Mitrofanina haulouts in the State parallel fishery. These areas are currently closed to Pacific cod fishing with pot gear to conserve prey for Steller sea lions (see 68 FR 204, January 2, 2003). These areas are not closed to fishing for Pacific cod with jig gear.

If adopted, this change would require NMFS to reinitiate formal consultation under section 7 of the Endangered Species Act (ESA) on effects of the Federal and State parallel groundfish fisheries on the endangered western distinct population segment of Steller sea lions (WDPS). On November 24, 2010, NMFS issued an ESA section 7 biological opinion on effects of the Federal and State parallel groundfish fisheries off Alaska on species listed as threatened or endangered under the ESA. Because the action analyzed in that biological opinion included the area closures adopted by the State during the parallel groundfish fisheries, any change to those closures would require NMFS to reinitiate consultation on the effects of the groundfish fisheries as modified by the reduction in areas closed to fishing around Steller sea lion haulouts.

A new biological opinion would assess the impact of this change and whether the Federal and State parallel groundfish fisheries are likely to jeopardize the continued existence of the WDPS or adversely modify its designated critical habitat. Depending on the outcome of this biological opinion, NMFS could be required to further restrict Federal fisheries to avoid jeopardizing the continued existence of the WDPS or adversely modifying its designated critical habitat.

Due to this proposal's potential to reduce the availability of an important prey species for endangered Steller sea lions, we encourage the Board to maintain the existing closure to Pacific cod pot gear in the vicinity of haulouts.

Proposals 10 & 11: Increase the South Alaska Peninsula Area State-waters Pacific cod fishery GHL from 30 to 40 percent of the Western Gulf of Alaska ABC.

As noted earlier, these proposals would result in NMFS reducing the Federal TAC for all participants in the Western Gulf of Alaska to account for the increased State GHL in the South Alaska Peninsula. Under current Federal regulations, the TAC is apportioned by sectors that include vessels using specific gear types (e.g., pot or hook-and-line gear) and vessel operational types (i.e., catcher vessels or catcher/processors). Adoption of a significantly larger GHL could require NMFS to close directed fishing to participants in the Federal Pacific cod fishery because some sector allocations in the Western GOA are already very small and further reductions in the TAC needed to accommodate a larger GHL fishery may prohibit a Federal directed fishery for these sectors. The hook-and-line catcher vessel and trawl catcher/processor sectors are the two sectors most likely to face a closure to directed fishing.



Proposal 14: Calculate GHLS for Bering Sea and Aleutian Islands (BSAI) State-waters Pacific cod fisheries based on federal ABC for subareas of the federal Bering Sea and Aleutian Islands area.

NMFS supports this proposal to clarify the method for calculating the State GHL fisheries based on the appropriate ABC in each subarea.

Proposal 15: Expand the Dutch Harbor Subdistrict State-waters Pacific cod fishery boundaries and increase the state-waters fishery GHL from 3 to 9 percent of the Federal BSAI ABC.

This proposal would increase the size of the Dutch Harbor Subdistrict. This proposal would require NMFS to update the Dutch Harbor Subdistrict boundaries in the NMFS Catch Accounting System to oversee the Federal overfishing levels.

If adopted, this proposal would open state waters south of 55 degrees 30 minutes N lat. from 167 degrees W long. to 170 degrees W long. to fishing for Pacific cod in the state-waters fishery. This area includes the Bogoslof Area, which is designated as a special aquatic foraging area within critical habitat for Steller sea lions. This proposal would open the western portion of the Bogoslof Area to fishing for Pacific cod in the state-waters fishery including the Unmak Island and Uliga Island Steller sea lion haulouts. This area (from 168 degrees W long. to 170 degrees W long.) is closed to Pacific cod fishing in the Federal fishery to conserve prey for the WDPS of Steller sea lions.

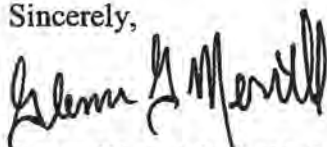
This change to the State GHL Pacific cod fishery would not require an ESA section 7 consultation. However, NMFS is concerned that fishing in these areas may have negative consequences for Steller sea lions. When the Board adopted the Dutch Harbor Subdistrict State GHL Pacific cod fishery in 2012, it maintained closures in areas currently closed to Federal fishery participants to minimize potential impacts on Steller sea lion prey resources in these areas. We encourage the Board to maintain these existing closure areas to conserve nearshore prey for Steller sea lions.

Proposal 18: Align AI District state-waters Pacific cod season opening and closing dates with recent changes to federal Pacific cod management.

NMFS supports this proposal to clarify the AI District state-waters Pacific cod season opening and closing dates.

Thank you for considering our comments. Glenn Merrill from my staff will be attending the Board meeting and will be available to answer questions for the Board.

Sincerely,


For James W. Balsiger, Ph.D.
Administrator, Alaska Region



Comments for the Board of Fisheries for the January, 2016 meeting in Fairbanks from Kwethluk, Incorporated and shareholders

Proposals 93 and 95 – against

Proposal 95 and the alternative solution in Proposal 93 make it possible to establish a Tier II fishery for Chinook salmon in the Kuskokwim River. A majority of people living in the River qualify in having a “customary dependence” of the Chinook, “proximity to the stock or population” and “availability of alternative resources.” What would be difficult is to determine who would get a Tier II permit, especially if it is given in limited numbers, when all those applying are eligible to get one. This means that it is possible for a family or extended families who work together, that have gathered the Chinook for many years, NOT to get a Tier II permit. And this will not be fair and equal. It is more likely to bring about resentment and division among the people and ADF&G, “illegal” fishing out of desperation and general discontent to the Kuskokwim River, similar to what happened in 2013.

Kwethluk, Incorporated and its shareholders are against these two proposals.

Proposal 94 - against

The number of the inriver goal in this proposal is unreasonably high because of the recent lower returns of the Chinook to the Kuskokwim. We would probably get close to that number when there is absolutely no drift net and set net fishing for any kind of fish from the latter part of May to the first half of July for the lower half of the Kuskokwim River, and the whole months of the June and July for the middle and upper half of the River. This would effectively wipe out all subsistence activities on any type of fish for the entire River in this time period.

The Bethel Test Fishery does not and never has had the means to accurately count all the Chinook going upriver. At best, they attempt to make a good guess using test fishing. Historically, over 1/2 to over 3/4 of the Chinook are already upriver from Bethel by the 25th of June on any given year. The residents and experienced subsistence fishers of the Lower Kuskokwim would say the same thing.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 96 - against

Because of the difference in population in the lower and upper Kuskokwim areas, separating the amount of subsistence caught Chinook into three areas as proposed will not be fair and equal.



According to the 2010 Census, the combined total of people representing the middle and upper Kuskokwim from Lower Kalskag to the headwaters of the Kuskokwim is 1,900. From Tuluksak to the mouth of the Kuskokwim (including the Tundra villages and three coastal villages north of the mouth of the Kuskokwim), the combined total of people representing the lower part of the Kuskokwim is 12,305. Bethel alone has a population of over 6,000. In order to be fair and equal (if what this proposal is looking for), then we must look at active fish camps along the entire River who are, and have been, practicing customary and traditional use of the salmon. Because most of the people live in the lower part of the Kuskokwim (below the 2 Kalskags), we will find more fish camps there and they will always have allocations (if there are any to be given) more in number than the middle and upper Kuskokwim. If we want a fair and equal share of our salmon as a subsistence resource, then we must count all the fish camps within the River that have a real status of being customary and traditional, and equally disburse the allocated subsistence catch of Chinook.

Dividing the amounts necessary for subsistence uses in three areas as this proposal states will not work.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 97 – against

As it is stated, this proposal would make it possible for each and every household in the Kuskokwim River to get a Chinook subsistence permit. A household permit for each and every household in the Kuskokwim River will result in giving opportunity to individuals or families who have not customarily and traditionally harvested Chinook or other salmon stocks. In many cases in our villages, single or two member families do not have the means or equipment to harvest any salmon and have not done so. If this proposal passes, most of the 160 plus households in Kwethluk, if not all, will get a household permit because they will all qualify as State residents and subsistence resource gatherers. This will open the door for most households in Bethel to get a permit too, even if they have not customarily and traditionally harvested the Chinook and are not federally qualified users.

There is also a danger in making the permit a permanent fixture in subsistence activities even in years where there is not a concern for low Chinook numbers. This would unnecessarily put more work on State and Federal agencies that manage our resources.

Additionally, a household permit, as this proposal states, would only record the number of Chinook that have been taken and none of the other species of fish recorded. The present system of surveys the Alaska Department of Fish and Game does after the summer season is still a viable and near-to-accurate means of recording subsistence catch of all fish species from May to September in the Kuskokwim River.



If we have to use a permit system for Chinook, and to be fair to those who are asking for customary and traditional use of our resources, then the only way for this to work would be to give permits to those families who have now, and have had, fish camps.

Kwethluk, Incorporated and its shareholders are against this proposal.

Proposal 222 – against

This proposal brings forth the idea of having a community and a personal household permit, and is open to any resident living in the Kuskokwim River, no matter how long they have lived in the area. There is no language to indicate whether one has had customary or traditional use of the Chinook and anyone can take a household permit to attempt to freeze or make canned Chinook even in times of conservation. If the proposal passes, household permits in the thousands from 28 communities could be handed out because most household will qualify for subsistence fishing. Resentment and dissatisfaction will occur if all eligible households do not get a permit. And it doesn't make sense to try to get Chinook for canning when there are efforts to conserve them. There are other species of salmon that are caught in the Kuskokwim - chum, sockeye and silver - that can be frozen or canned in greater amounts and produce better yields.

During June of 2015, the USF&W enabled Kuskokwim communities to catch Chinook in allocated amounts. Although not all communities participated, those that did were given a taste of Chinook and relieved some of the craving for fresh salmon. Kwethluk took part in this and its residents were grateful for it.

Kwethluk Incorporated and its shareholders are against this proposal as it is written.

Contact: Martin Nicolai
(907)757-2260