



Additional Federal permitting requirements to identify harvest from the new area to be fished may benefit management of this expanded area. Additionally, adoption of this proposal could result in proposals to the Federal Subsistence Board to change the customary and traditional use determinations for salmon and fresh water species for the additional nine miles of the Copper River of interest.

Adoption of this proposal may lead to increases in lower Subdistrict harvests in the State managed personal use fishery potentially resulting in new challenges to fisheries managers. If this proposal is adopted, an unknown amount of salmon and fresh water species exploitation will take place in an area not formally open to the State's personal use fisheries. If a significant amount of effort is transferred to a lower point in the watershed, some reallocation of the inriver harvest will take place of fish formally harvested further up river.

If adopted, managers will be required to determine the impacts the new fishery will have on run timing, stocks being targeted, variations to previously utilized standards for inriver movement timing above the sonars, among other yet to be realized impacts. More importantly, if this proposal is adopted, the impacts on Federal subsistence opportunity for Federally qualified subsistence users would be unknown initially.

Federal Position/Recommended Action: Neutral.

Adoption of this proposal may provide additional opportunity for users who choose to participate in the Federal subsistence and personal use fisheries in the newly expanded area of the Copper River. Adoption of this proposal is not expected to increase Federal subsistence harvest by a significant amount, as users currently have annual harvest limit restrictions found in both State and Federal regulation.

Submitted By
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Submitted On
11/15/2017 8:26:43 AM
Affiliation



PC67
1 of 1

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Introduction -My name is Paul Owecke I have fished as a permit holder in the PWS setnet fishery since 1983. Prior to entering the fishery I was employed by ADFG as a Fish Culturist at Crooked Creek Hatchery, Kasilof and Main Bay Hatchery, PWS. I declined the Assistant Manager position offered at Main Bay as I was entering the fishery. Prior to ADFG, I was employed seasonally as a Fisheries Biologist for the State of Minnesota and crewed in various Alaska fisheries. I am a founding member of Prince William Sound Setnet Association. I now have a daughter who holds a PWS setnet permit, and have had three crew members enter the fishery. Our family of four all participate in the fishery.

Proposal 40 - Neutral. I understand this issue and experience similar frustration with drift nets being intentionally grounded next to setnets, but believe that this proposal puts an unenforceable burden on already over extended Protection officers. Should Fisheries Protection indicate this is a favorable means to address this issue I would support this proposal.

Proposal 41- Oppose. This proposal would create an enforcement problem first in defining a pinnacle, many of which are only pinnacles at certain stage of tide. Some pinnacles are submerged at high tide, and some pinnacles are points connected to the mainland at low tide. This places an unenforceable burden on Protection officers. In my experience this proposal is addressing an essentially non-existent problem for the drift fleet. It does not warrant the enforcement problems for the minimum benefit to the drift fleet.

Critical Background - Proposals 42-45 These four proposals should be reviewed with greater clarity on the circumstances that have led up to submission of these radical proposed changes.

First and foremost in 2016 and 2017, only the Main Bay Subdistrict was opened for harvest for the majority of fishing time in the Eshamy District. This was done in order to protect Coghill wild stock sockeye returning to Coghill Lake. In a typical season, with adequate Coghill escapement allowing harvest throughout the entire Eshamy District the concentration of effort and gear is spread over an area approximately seven times larger than Main Bay. This magnitude of reduction in fishing area forces a concentration of both set and drift gear into Main Bay that leads to overcrowding and conflict. However, Coghill wild stock returns are projected to return to expected levels in 2018, with brood year 2014 escapement reaching 42,384 (See Item 1 ADFG Coghill River Escapement for 2014) within a escapement goal of 20,000-60,000. This return to historic levels of return will allow management to again allow greater harvest district wide affording much greater area to both gear types. These proposals are an overreaction to a problem that has and will occur sporadically over time. The problem of reduced returns though do not warrant reducing fishing opportunity for the setnet gear group to the advantage of drift.

Another aspect leading to greater conflict in both 2016/17 is the decline in harvest of Copper River Sockeye that results in a much larger portion of the drift gillnet fleet to relocate to the Eshamy District. In 2016 the Copper River Harvest was 22% lower than the 10 year average, and 2017 was 60% lower than the 10 year average, with fishing time reduced 40% lower than the 10 year average (See Item 2 & 3 ADFG 2016/17 PWS Salmon Season Summary). Again,



reduced returns elsewhere led to greater concentration of effort and gear in an already reduced Eshamy District, and again reducing setnet opportunity with these proposals can not be the means of resolving harvest shortfall for the drift fleet.

Also, there is currently among the drift fleet a widespread perception that the setnet fleet is over harvesting as reflected in the restriction on fishing time imposed by the PWS Allocation Plan. In 2016 the setnet fleet was one tenth of one percent over their allocation, to trigger 2017 time restrictions. In 2017 the setnet fleet was two tenths of one percent over, and that will trigger time restrictions in 2018. The drift side will no doubt point out that in 2016 the setnet harvest was nearly double its allocated harvest. Close inspection of the data will also show that 2016 was the lowest year of setnet harvest in the five years used to calculate harvest average, and that the reason for percentage harvest increase was driven by historically low seine harvest for 2016. (See Item 4 ADFG News Release #76, 2018 Allocation Plan) Misguided understanding of harvest percentage has led to drift support of reducing setnet harvest by implementing these proposed regulation changes.

Making the situation even more prone to competition and conflict is the shortfall of sockeye returns to Main Bay Hatchery. 2016 saw a 41% shortfall in hatchery returns, 2017 saw a shortfall of 46% in hatchery returns. (See Item 2 & 3 ADFG 2016/17 PWS Season Summary) And, again shortfalls in harvest by the drift fleet do not justify reducing harvest capacity of setnetters through regulation change.

Proposal 42 - Oppose. Allocative in the extreme and would escalate conflict between set and drift users to intolerable levels.

This proposal attempts to give the impression that the nearshore areas of Main Bay are “traditional drift” areas” when in fact these nearshore areas have been historically the only area much of the setnet gear group utilizes for the majority of their season, and has been recognized by previous BOF action as the area BOF created as a setnet area of greatest use and importance.

With the advent of hatchery returns to the district in 1983 and the creation of a terminal fishery area at the head of Main Bay the BOF in a proactive move at the 1984 BOF meetings began development of the Main Bay Salmon Hatchery Harvest Management Plan 5AAC 24.367. In approving the plan the setnet group agreed to give up then current legal access to any surface waters beyond 50FM in the Terminal Harvest Area (THA) (See Item 5 Map Main Bay) and surface waters beyond 100 FM in the remainder of the district. All area in white inside of the THA and the remainder of Main Bay are the areas setnets were excluded from in 1984 (See Item 5 Map Main Bay), access to over 80% of the district was lost. In recognizing the need for additional beach access for the setnet group the BOF permitted the placement of setnets 50 FM apart inside the THA, from the established 100FM. The BOF then adopted a separation between drift and set gear of 25 FM, with the assumption that the areas between setnets placed 50 FM apart would not allow deployment of drift gillnets. This previous BOF action prohibiting



setnet access to offshore areas and designating setnet use only to nearshore areas is a clear indication of prioritizing those areas as the areas of expected setnet use. With expected use comes the lines, anchors and buoys required to anchor a setnet, anchoring is required by law 5AAC 39.105 (d) (2).

In 1985, the THA was divided and marked at 50 FM intervals by setnetters and the sites were assigned by a lottery to all interested permit holders. Most of those sites remain under State Division of Lands Shorefishery Lease to this day. That this area is now being claimed as historic and traditional beach area by the drift fleet does not reflect reality. The numbers of setnet permits and gear fished in this area and all of Main Bay have remained the same since 1984, contrary to claims otherwise in this proposal.

To now respond with a proposal that essentially locks in conflict and increases the area exclusively accessible to drift gear is not equitable, safe or enforceable. What this proposal does is essentially create a 10FM drift, free for all zone, between virtually every setnet site inside the the THA. The outcome would in effect turn the entire THA into a drift dominated harvest area with 50FM straight line setnets alternated between 150FM drift nets fished in any configuration. Setnet gear would be made essentially ineffective. This is an obvious attempt to convert a setnet fishing area into a drift fishing area which would be allocative in the extreme, and a drastic departure from the existing Main Bay Harvest Management Plan.

In actual outcome, if approved, visualize an opening morning, 20 foot, 90 HP setnet skiffs lined up 50 FM apart in the THA, spaced between every setnet skiff are several 32 foot 600 HP drift boats. Each skiff sets in a straight line 50 FM of gear. Each drift boat sets concurrently 150FM of gear in any configuration between setnets. The scene would be total chaos with setnet harvest cut to the point of being not worth setting gear in the THA.

This proposal is in direct opposition to BOF precedence within the district historically. As originally passed by the BOF in 1984, in the Crafton Island Subdistrict, setnets were able to be placed 100FM apart with a separation between set and drift gear set at 50FM. As in the THA the assumption was that drift gear would not be permitted between setnets. However, drift operators regularly deployed gear between setnets and the level of conflict between drift and set gear had escalated in the Crafton Island Subdistrict to the point that Fish and Wildlife Protection in the 1996 BOF cycle submitted a proposal to increase the distance between set and drift gear from 50FM to 60FM. This was done in order to prevent the type of conflict this proposal 42 would only escalate. The 1996 proposal by protection passed and has reduced conflict greatly in the Crafton Island Subdistrict. (5AAC 24.335) Because of the demonstrated reduced conflict as a result of this action we request that the BOF increase the 25FM distance between drift and setnet gear inside the THA to 30FM. The BOF has precedence to guide its efforts.

This proposal also requests the reduction of 100FM setnets in the outer portion of Main Bay be reduced to 50FM. This is blatantly allocative, has no basis for approval and would without question increase the number of locations throughout the district that setnets are deployed, in



direct opposition to the requests of the drift fleet to reduce setnet gear locations. If 100FM nets are reduced to 50FM, that gear reduction would require additional 50FM net locations elsewhere in Main Bay or the district.

Of great significance is that during approximately 50% of every fishing season there is access to harvest in the Alternating Gear Zone (AGZ)(See Item 5 Map Main Bay) at the head of Main Bay with drift and set gear taking alternating periods inside the AGZ to harvest hatchery return buildups. When the AGZ is open to setnet gear, virtually all setnet gear in Main Bay is relocated to the AGZ giving total beach access to the drift fleet throughout Main Bay, and they are able to harvest buildups with all setnet lines bouys and anchors remaining in place. This drift harvest has been occurring for decades and is not prevented by the lines and bouys in place.

Proposal 43 - Oppose. This proposal would remove completely the legal protections afforded the setnet user group in setting and operating stationary gear. As is enforced presently, whenever a setnet is deployed, if a drift net is closer than legal distance it is the responsibility of the drift user to relocate in order to abide by legally established distances between gear types. If as proposed there is no legal consequence for compliance by drift operators there would be no consequence for not abiding by the intent of established set backs between gear types. And, with no timeline established for a drift net to be compliant with legal separation of gear types a drift operator could legally take an entire fishing period to come into compliance. In effect, the proposal asks that illegally operated drift gear no longer can be deemed illegal and the setnet operator be obligated to allow unlimited time for the drift operator to move gear that is always considered legal if is deployed prior to a setnet.

In practice this would encourage and result in drift operators setting gear next to and concurrently with set gear throughout Main Bay and then give unlimited time for drift retrieval. This would be highly allocative, unenforceable and result in a level of conflict that would eliminate safe and orderly operations.

The proposal states that the issues to address are setnet crews illegally deploying and operating boats and gear independently during openers. However, (5AAC 39.107 d) makes clear that this is not illegal and permitted in setnet fisheries statewide. Stated as an issue is that "a drift operation needs to be able to retrieve its gear if it is deployed before a setnet is deployed." There is no instance of a drift operator ever being prevented from retrieving gear by a setnetter in order to comply with the law. The law is in place to prevent gear conflict, and past enforcement, and common sense, has been to require mobile gear to relocate when not compliant. To not require compliance makes gear separation ineffective and the fishery unsafe and unmanageable.

Stated as an issue is reduced drift access to Main Bay buildups. Unstated is the fact that the buildups often occur in offshore areas not accessible to setnet harvest by law. Also, unstated is that during approximately 50% of every fishing season there is access to harvest in the



Alternating Gear Zone (AGZ)(See Item 5 Map Main Bay) at the head of Main Bay with drift and set gear taking alternating periods inside the AGZ to harvest hatchery return buildups. When the AGZ is open to setnet gear virtually all setnet gear in Main Bay is relocated to the AGZ giving total beach access to the drift fleet throughout Main Bay and they are able to harvest buildups with all setnet lines bouys and anchors remaining in place. When the drift fleet does have access to the AGZ every other period they in fact harvest the buildups they claim they are denied.

This proposal, without accurate justification, asks to eliminate longstanding regulation that is enforced uniformly statewide that a drift operator be required to relocate when his gear is non-compliant with gear type distance separations. To exempt drift operators from complying with established law opens the door to conflict, allocation imbalance and safety issues.

Proposal 44 - Oppose. This proposal fails to recognize that there currently exist detailed regulations that permit setnet crew to deploy and operate gear independently of the permit holder and that it is uniform in law and practice statewide. The authors assume that 5AAC 24.331(G)(3) is the final word on operation of stationary gear. However, 5AAC 39.107 goes into great detail to define the operation of both mobile and stationary gear and is uniform for fisheries throughout the state. To further clarify, in PWS General Provisions page 41 Item (31) a permit holder can be not only in a boat independent of other boats associated with their permit they may also be in a structure associated with providing shelter for their operation.

Current regulation specifically allows a permit holder to set all three sites at once with independent crews and boats. To prevent this would break with statewide regulation covering all setnet operations. More importantly, it would lead to chaos in the PWS fishery and extreme loss of harvest opportunity for the setnet fleet.

If a permit holder were required to be in a boat that set all gear, the permit holder would at the beginning of an opener be able to deploy a single net. By the time they had set one net travelled around all deployed drift nets and then arrived at the second location to deploy a net they would find drift nets deployed preventing deployment of any additional setnet gear. In effect this proposal would cut by 2/3rds the amount of gear a setnet permit holder could deploy during any opener district wide.

The proposed change would also require the permit holder to be in the boat when all gear is being retrieved. This would prevent the timely removal of nets at the end of fishing periods, but more importantly would not allow multiple boats to retrieve nets in order to have gear and crew off the water in the event of storm conditions approaching. This change poses a safety threat to participants.

Current regulation is effective, uniform statewide and enforced. The proposed change is extremely allocative and would promote intense conflict and safety issues between gear types.



Proposal 45 - Oppose. This proposal falsely claims that there has been a marked increase in unused setnet sites over time and that these sites “preclude the drift fleet from historic beach area.”

The number of active setnet permits and gear has remained constant since the inception of the Main Bay hatchery harvest in 1983. There was in fact more of both set and drift gear concentrated in Main Bay in 2016/17 as management moved the majority of the harvest into Main Bay to protect wild Coghill stocks. However, all set gear was deployed in compliance with the law and did not prevent drift harvest. Statewide there are no caps on the amount of gear a setnet operator is allowed to place for operations.

Since the inception of the setnet fishery, it has been common practice for setnet operators to open a fishing period in one location and relocate to outside beach areas, similar to drift operators relocating to areas of greater fish concentration. When relocating to a new location, if lines and bouys are not in place, drift gear is often deployed on clearly marked setnet sites and drift operators refuse to allow deployment of setnet gear. They will not move gear in order to raise lines and attach bouys in order to set a net, and a setnet operator has no authority to require a drift operator to remove his gear. Without the ability to have lines in place, participation in the fishery is denied.

Throughout the state there is no limitation on the ability of setnets to be relocated or the number of sites utilized for setnet use. Each PWS setnet permit typically has six sites with lines and bouys in place to be able to participate in the fishery.

The issue as stated by CDFU also states that setnet lines and bouys “preclude” drift harvest. They are implying that lines set 50 to 100FM apart prevent drift harvest. But, in Proposal 42 CDFU proposes that by reducing distances between set and drift gear that they be allowed to harvest in an area 10FM or sixty feet wide between setnets. Why in one area are they able to harvest within sixty feet while in other areas they claim inability to harvest in 50 to 100 fathoms. This proposal is a blatant move to prevent setnet harvest by not allowing adequate gear to be in place to harvest effectively or safely.

Also, as stated in previous BOF meetings the lines anchors and bouys placed for setnet operation are put in place in times of calm seas. This proposal would at times require unsafe operation by forcing the raising of lines and placing bouys in whatever sea state was occurring.

This proposal has been submitted in similar form in three previous BOF cycles for PWS. Each time the board has rejected the proposal for safety and conflict reasons. Nothing has changed since, and the number of sites occupied has not increased. In the time period since those previous proposals the drift fleet has effectively carried out their harvest with setnet gear in



place. There has been no displacement of the drift fleet from historic areas as stated. No additional regs are needed to facilitate drift harvest.

Proposal 46 - Support. I do not support one party or the other in this proposal. However, I do support ADFG returning to all previous marked closure and boundary lines statewide. There has been widespread disruption in fisheries statewide by adhering to the incorrect coordinates currently assigned to historic closure and boundary lines. The coordinates need to be updated to reflect closure and boundary lines as used over time.

Proposal 48 - Oppose. This fishery needs to be returned to a cost recovery fishery as it was intended. It is currently managed as a common property fishery in non-compliance with regulation 5AAC 24.370 that prevents seine operation prior to July 18. As currently managed it is now allowing the seine fleet to effectively target wild and hatchery sockeye salmon returning to Coghill River and Main Bay Hatchery. Current management places no burden of conservation on this fishery and it regularly harvests threatened Coghill wild stocks and fully allocated Main Bay hatchery sockeye stock.

Proposal 49 - Support Option 1. This fishery needs to be returned to a cost recovery fishery as it was intended. It is currently managed as a common property fishery in non-compliance with regulation 5AAC 24.370 that prevents seine operation prior to July 18. As currently managed it is now allowing the seine fleet to effectively target wild and hatchery sockeye salmon returning to Coghill River and Main Bay Hatchery. Current management places no burden of conservation on this fishery and it regularly harvests threatened Coghill wild stocks and fully allocated Main Bay hatchery sockeye stock.



11/7/2017

Fish Counts - Sport Fish - ADF&G



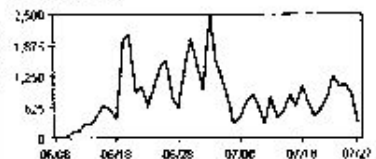
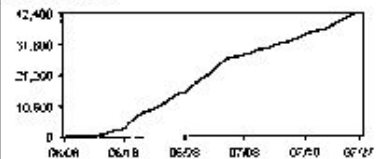
Alaska Department of Fish and Game

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Fish Count Data Search

Location: Coghill River	Species: Sockeye	Year: 2017 2016 2015 2014 2013	Submit
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COGHILL RIVER SOCKEYE FOR 2014

Location: Coghill River Species: Sockeye Method: Weir	The selected years are color-coded in the graphs below: 2014
Daily Counts 	Cumulative 
Description: The Coghill River weir is approximately 1.75 miles up river from tidewater. The fishery occurs along the entire length of the river and in the lake, but the area within 300 feet of the weir is closed. Fish can travel from salt water to the weir within a few hours but this is highly dependant on water flow and tide level. The current escapement goal for Sockeye is 20,000 to 60,000.	
Contact: PWS Comm Fish Research Biologist. (907) 424-3212	

[New Search](#)

50 records returned for the years selected. Dashes indicate days with no count.

[\[Export results in Excel format\]](#)

Date 2014	Count 2014	Cumulative 2014	Notes for 2014
Jul-27	350	42,384	
Jul-26	905	42,034	Last day of counts for season
Jul-25	1,094	41,129	Last day of weir counts will be tomorrow
Jul-24	1,054	40,035	
Jul-23	1,271	38,981	
Jul-22	828	37,710	
Jul-21	581	36,882	
Jul-20	432	36,301	

<http://www.adfg.alaska.gov/sd/FishCounts/index.cfm?ADFG=main.displayResults>

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Item 1: 2014 Coghill River Sockeye Fish Count



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES NEWS RELEASE



*Sam Cotten, Commissioner
Scott Kelley, Director*



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2016 PRINCE WILLIAM SOUND SALMON SEASON SUMMARY

The following is an overview of the 2016 Prince William Sound (PWS) Area commercial salmon season. Please note that numbers in the narrative are rounded for simplicity and all data are considered preliminary.

The 2016 PWS Area commercial salmon harvest was 19.13 million fish. Harvest was composed of 13.27 million pink, 1.94 million sockeye, 3.43 million chum, 478,000 coho, and 12,000 Chinook salmon. The 2016 harvest included 13.67 million (71.5%) commercial common property fishery (CCPF), and 5.46 million (28.5%) hatchery cost recovery and broodstock fish.

GILLNET FISHERIES

COPPER RIVER DISTRICT

The 2016 preseason commercial harvest forecast for the Copper River District was 21,000 Chinook, 1.62 million sockeye, and 201,000 coho salmon. Gulkana Hatchery was projected to contribute 169,000 sockeye salmon to the CC PF harvest. The commercial salmon fishing season in the Copper River District began on Monday, May 16. Through the end of July, the commercial fishery was open 756 hours, 96 hours more than the recent 10-year average. The sockeye salmon harvest of 1.14 million fish was 22% less than the previous 10-year (2006–2015) harvest average of 1.46 million sockeye salmon. The average sockeye salmon weight of 5.3 lb was the second smallest on record. The number of wild sockeye salmon in the Copper River District CC PF harvest was 968,000 or 85%. Gulkana Hatchery contribution to the sockeye salmon CC PF was 153,000 fish or 13% of the harvest. Main Bay Hatchery contributed 16,800 fish, or 2% of the Copper River harvest. The CC PF harvest of 11,600 Chinook salmon was below the previous 10-year (2006–2015) average harvest of 17,200. The season total coho salmon commercial harvest of 365,000 fish was nearly double the previous 10-year (2006–2015) average harvest of 201,000 coho salmon. The 2016 preliminary sonar inriver estimate was 802,000 salmon and was within the 712,000–1,100,000 salmon range of the inriver goal. Spawning escapement to Copper River delta systems based on aerial survey indices was 51,600 sockeye salmon, and was below the sustainable escapement goal (SEG) range of 55,000–130,000 fish. However, pilot availability and poor survey conditions likely contributed to the lower counts and



it is likely that the goal was achieved. Coho salmon spawning escapement to the Copper River Delta based on aerial survey indices was 65,700 and was within the SEG range of 32,000–67,000 fish. Preliminary estimates of inriver Chinook salmon abundance indicate that spawning escapement was below the lower bound SEG of 24,000 fish.

BERING RIVER DISTRICT

The 2016 preseason commercial harvest forecast for the Bering River District was 14,000 sockeye, and 46,000 coho salmon. The sockeye salmon commercial harvest of 9,400 fish was 23% above the previous 10-year (2006–2015) harvest average of 7,600 fish. The coho salmon commercial harvest of 81,400 was 80% above the previous 10-year (2006–2015) harvest average of 45,300 fish. Commercial fishing effort in both the sockeye and coho salmon fisheries was high due to productive fishing in the eastern portion of the Copper River Delta. The aerial escapement index of 21,700 sockeye salmon was within the SEG range of 15,000–33,000 fish. Aerial surveys of coho salmon produced an escapement index of 25,800 fish that was within the SEG range of 13,000–33,000 fish.

COGHILL DISTRICT

Prince William Sound Aquaculture Corporation (PWSAC) forecast a 2016 run of 2.15 million chum and 20,700 coho salmon to Wally Noerenberg Hatchery (WNH) and required 1.17 million (55%) chum and 2,700 (13%) coho salmon for cost recovery and broodstock. The CCPF drift gillnet harvest of chum salmon in the Coghill District was 1.83 million fish. PWSAC harvested 942,000 chum salmon for cost recovery and broodstock. The CCPF drift gillnet harvest of sockeye salmon in the Coghill District was 67,100 fish. The proportion of wild sockeye salmon in the Coghill District CCPF harvest was 10,500 fish (16%). Pink salmon CCPF drift gillnet harvest in the Coghill District was 9,200 fish. The proportion of wild pink salmon in the Coghill District CCPF harvest was 29%. The CCPF drift gillnet harvest of coho salmon in the Coghill District was 6 fish.

The sockeye salmon run forecast for Coghill River was 110,000 fish. The Coghill River weir passed 8,708 sockeye salmon, coming in below the SEG range of 20,000–60,000 fish.

ESHAMY DISTRICT

PWSAC forecast a run of 1.60 million Main Bay Hatchery enhanced sockeye salmon. The CCPF harvest of sockeye salmon in the Eshamy District was 656,000 fish, 41% below the forecast. The proportion of wild sockeye salmon in the Eshamy District CCPF harvest was 3% (19,200 fish).

UNAKWIK DISTRICT

Unakwik District CCPF drift gillnet harvest was 340 sockeye salmon, which was well below the 10-year average of 3,000 sockeye salmon.

MONTAGUE DISTRICT, PORT CHALMERS SUBDISTRICT

PWSAC forecast a run of 330,000 chum salmon to the Port Chalmers remote release site in 2016. The drift gillnet gear group had access to the Port Chalmers Subdistrict in 2016 under the Prince William Sound Management and Salmon Enhancement Allocation Plan. The CCPF drift gillnet harvest of chum salmon in the Montague District was 200,500, 40% below forecast. The proportion of wild chum salmon in the Port Chalmers Subdistrict CPF harvest 11%.

PURSE SEINE FISHERIES



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES NEWS RELEASE



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2017 PRINCE WILLIAM SOUND SALMON SEASON SUMMARY

The following is an overview of the 2017 Prince William Sound (PWS) Area commercial salmon season. Please note that numbers in the narrative are rounded for simplicity and all data are considered preliminary.

The 2017 PWS Area commercial salmon harvest was 56.15 million fish (Table 1). Harvest was composed of 48.73 million pink, 1.43 million sockeye, 5.42 million chum, 554,000 coho, and 13,600 Chinook salmon. The 2017 harvest included 50.34 million (90%) commercial common property fishery (CCPF), and 5.82 million (10%) hatchery cost recovery and broodstock fish.

The estimated value of the combined commercial salmon harvest, including hatchery sales, was approximately \$127.98 million. During the 2017 season, 518 drift gillnet, 29 set gillnet, and 229 purse seine permit holders fished in at least one fishing period. Drift gillnet exvessel harvest value was an estimated \$38.47 million (average permit earnings of \$74,200); set gillnet exvessel harvest value was an estimated \$1.56 million (average permit earnings at \$53,800); and purse seine exvessel harvest value was an estimated \$71.79 million (average permit earnings at \$313,500). Revenue generated for hatchery operations was approximately \$16.16 million.

GILLNET FISHERIES

COPPER RIVER DISTRICT

The 2017 preseason commercial harvest forecast for the Copper River District was 4,000 Chinook, 889,000 sockeye, and 207,000 coho salmon. Gulkana Hatchery was projected to contribute 173,000 sockeye salmon to the CC PF harvest. A conservative management strategy was implemented due to the weak Chinook and sockeye salmon forecast. This strategy included reduced frequency and duration of fishing periods to match salmon run entry. The inside closure area was expanded and remained closed until mid-June. The expanded area included waters inside the barrier islands east of Kokinhenik Bar and west of Grass Island Bar. The anticipated first fishing period was skipped and the district opened on Thursday, May 18. Total fishing time through July was reduced by 40% compared to the 10-year average. The Copper River sockeye salmon harvest of 570,000 fish was 60% less than the previous 10-year (2007–2016) harvest average of 1.43 million sockeye salmon and 36% below forecast. The average sockeye salmon



2017 PWS Salmon Season Summary

October 03, 2017

weight of 5.5 pounds was the third smallest on record. The number of wild sockeye salmon in the Copper River District CCPF harvest was 530,000, or 93%. Gulkana Hatchery contribution to the sockeye salmon commercial harvest was 29,300, or 5% of the Copper River harvest, and was 90% below forecast. Main Bay Hatchery contributed 10,500 fish, or 2% of the Copper River harvest. The CCPF harvest of 13,100 Chinook salmon was below the previous 10-year (2007–2016) average harvest of 15,400. The current season total coho salmon commercial harvest of 288,000 fish is well above the previous 10-year (2007–2016) harvest average of 206,000 coho salmon. The 2017 preliminary sonar inriver estimate was 723,426 salmon and was within the 712,000–1,100,000 salmon range of the inriver goal. Spawning escapement to Copper River delta systems based on aerial survey indices was 57,000 sockeye salmon, and was within the sustainable escapement goal (SEG) range of 55,000–130,000 fish. Copper River Delta coho salmon spawning escapement monitoring is ongoing, but peak escapement counts are within the SEG range of 32,000–67,000 fish. Preliminary estimates of inriver Chinook salmon abundance are not available at this time.

BERING RIVER DISTRICT

The 2017 preseason commercial harvest forecast for the Bering River District was 4,000 sockeye, and 48,000 coho salmon. The sockeye salmon commercial harvest of 2,600 fish was 30% below the previous 10-year (2007–2016) harvest average of 3,700 fish. The coho salmon commercial harvest of 111,000 was more than double the previous 10-year (2007–2016) harvest average of 47,900 fish. Commercial fishing effort in the coho salmon fisheries was high due in part to productive fishing in the eastern portion of the Copper River Delta. The aerial escapement index of 18,800 sockeye salmon was within the SEG range of 15,000–33,000 fish. Bering River District coho salmon spawning escapement monitoring is ongoing, but peak escapement counts are within the SEG range of 13,000–33,000 fish.

COGHILL DISTRICT

Prince William Sound Aquaculture Corporation (PWSAC) forecast a 2017 run of 1.97 million chum and 230,000 coho salmon to Wally Noerenberg Hatchery (WNH) and required 818,000 (42%) chum and 2,700 (1%) coho salmon for cost recovery and broodstock. The CCPF drift gillnet harvest of chum salmon in the Coghill District was 2.17 million fish. The proportion of wild chum salmon in the Coghill District CCPF harvest was 5%. PWSAC harvested 724,000 chum salmon for cost recovery and broodstock. The total chum salmon return to WNH was 3.26 million fish and was 65% above forecast. The CCPF drift gillnet harvest of sockeye salmon in the Coghill District was 112,200 fish. The proportion of wild sockeye salmon in the Coghill District CCPF harvest was 24% (28,300 fish). Pink salmon CCPF drift gillnet harvest in the Coghill District was 662,000 fish. The proportion of wild pink salmon in the Coghill District CCPF harvest was 69%. The CCPF drift gillnet harvest of coho salmon in the Coghill District was 14,200 fish, 93% below forecast.

The sockeye salmon run forecast for Coghill River was 74,000 fish. The Coghill River weir passed 50,312 sockeye salmon, which is within the SEG range of 20,000–60,000 fish.

ESHAMY DISTRICT

PWSAC forecast a run of 1.15 million Main Bay Hatchery enhanced sockeye salmon. The CCPF harvest of sockeye salmon in the Eshamy District was 621,000 fish, 46% below the forecast. The proportion of wild sockeye salmon in the Eshamy District CCPF harvest was 9% (55,800 fish).



ALASKA DEPARTMENT OF FISH AND GAME DIVISION OF COMMERCIAL FISHERIES



NEWS RELEASE

Sam Cotten, Commissioner
Scott Kelley, Director



Contact:
Jeremy Botz, Gillnet Area Management Biologist
Charlie Russell, Seine Area Management Biologist
Stormy Haught, Area Research Biologist
Stacy Vega, Asst. Area Management/Research Biologist
Phone: (907) 424-3212 Fax: (907) 424-3235

Prince William Sound Area Office
401 Railroad Avenue, PO Box 669
Cordova, AK 99574-0669
Date Issued: Tuesday, September 26, 2017
Time: 12:00 pm

Prince William Sound Salmon Fishery News Release #76 2018 Allocation Plan (5 AAC 24.370)

The department calculated the exvessel value percentages for each gear group using the Commercial Operators Annual Report (COAR) area specific prices and weights and ADF&G harvest estimates of PWSAC enhanced fish by species and gear type (Table 1). The trigger points for corrections in allocation are 45% for purse seine and drift gillnet gear groups and 5% for the set gillnet gear group. The five-year (2012–2016) average value percentages for each gear type are 46.7% drift gillnet, 53.3% purse seine, and 5.2% set gillnet (Table 2). As a result, the purse seine gear group will have exclusive access to the Port Chalmers Subdistrict in 2018 and the set gillnet gear group will be limited to 36 hours per week in the Eshamy District starting July 10, 2018.

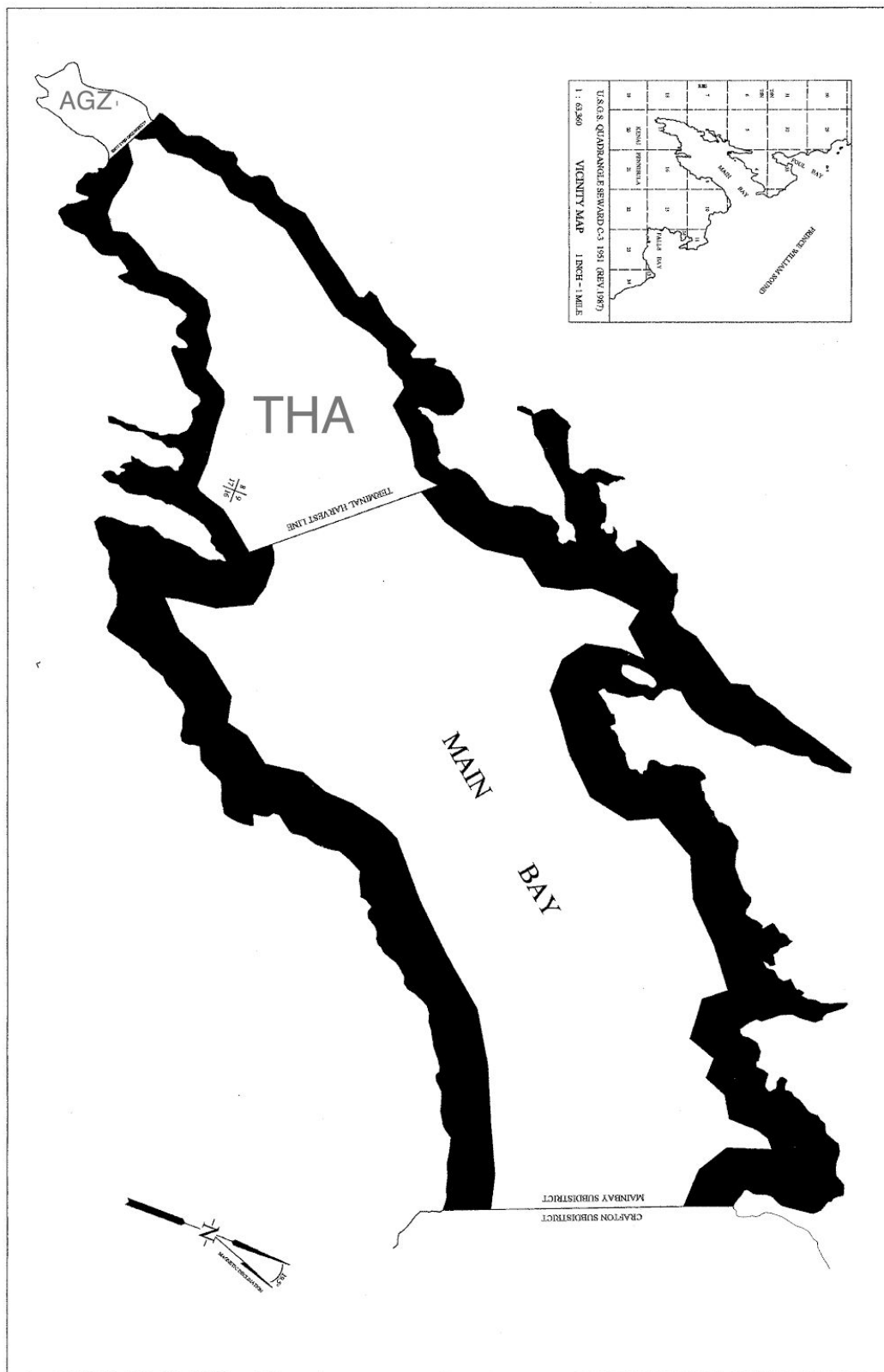
In December 2005, the Alaska Board of Fisheries modified the Prince William Sound Management and Salmon Enhancement Allocation Plan (5AAC 24.370). The modifications eliminated wild stocks and Valdez Fisheries Development Association enhanced fish from the plan and allocate only Prince William Sound Aquaculture Corporation (PWSAC) enhanced fish. Additionally, a five-year average exvessel value is now used rather than annual value percentages. The set gillnet gear group allocation is now 4% of the five-year average value of PWSAC enhanced salmon stocks. The drift gillnet and purse seine gear groups each receive 50% of the remaining value of PWSAC enhanced salmon stocks. If the set gillnet gear group exceeds 5% of the five-year average value of PWSAC enhanced stocks, they will be limited to no more than 36 hours of fishing time per week beginning July 10 in the year following this calculation. If the drift gillnet gear group harvest value is 45% or less, then in the year following the current calculations, the drift gillnet gear group shall have exclusive access to the Port Chalmers Subdistrict to harvest enhanced salmon returns from June 1 through July 30, during fishing periods established by emergency order. If the purse seine gear group harvest value is 45% or less, then in the year following the current calculations, the purse seine gear group shall have exclusive access to the Esther Subdistrict to harvest enhanced salmon returns from June 1 through July 20, during fishing periods established by emergency order.

Table 1. The 2016 COAR price per pound by gear type, species, and area.

2016 Species	Drift Gillnet		Purse Seine		Set Gillnet
	Copper/Bering	Prince William Sound	Prince William Sound	Prince William Sound	Prince William Sound
Chinook	\$6.27	\$4.29	\$1.07		\$4.26
Chum	\$0.19	\$0.58	\$0.54		\$0.62
Coho	\$1.52	\$1.08	\$0.82		\$0.26
Pink	\$0.15	\$0.21	\$0.28		\$0.23
Sockeye	\$2.78	\$1.72	\$1.58		\$1.61

Table 2. Values and percentages by gear type for Area E.

Year	Drift Gillnet		Purse Seine		Set Gillnet	
	Value	Percentage	Value	Percentage	Value	Percentage
2012	\$30,375,938	58.7%	\$21,361,107	41.3%	\$3,125,836	5.7%
2013	\$25,052,932	31.2%	\$55,194,763	68.8%	\$2,405,648	2.9%
2014	\$20,330,294	57.7%	\$14,894,564	42.3%	\$2,725,780	7.2%
2015	\$13,178,750	35.6%	\$23,825,054	64.4%	\$1,930,673	5.0%
2016	\$13,947,405	86.0%	\$2,279,015	14.0%	\$1,821,330	10.1%
Grand Total	\$102,885,318		\$117,554,502		\$12,009,266	
5-yr Average		46.7%		53.3%		5.2%



Item 5: Main Bay Map Prepared by Jeff Bassett-Mapping Professional



Submitted By
Philip Broyles
Submitted On
11/15/2017 4:55:39 PM
Affiliation

Prop #10-SUPPORT

Prop #13-OPPOSE

Prop #14-OPPOSE

Prop #15-OPPOSE:

Prop #16-OPPOSE

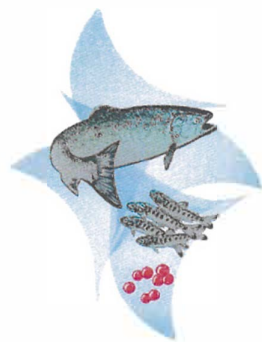
Prop #17-SUPPORT

Prop #18-SUPPORT

Prop #23-OPPOSE

Prop #28-SUPPORT

Prop #36-OPPOSE



Prince William Sound
Aquaculture Corporation

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

Nov. 10, 2017

Re: BOF proposals 47, 48 and 49

Dear Mr. Haight:

Please accept the following comments regarding Prince William Sound proposals numbers 47, 48 and 49 to the Alaska Board of Fisheries (BOF).

The three aforementioned proposals all deal with the Prince William Sound Management and Salmon Enhancement Allocation Plan. The Prince William Sound Aquaculture Corporation (PWSAC) provides enhanced salmon to all user groups. PWSAC does not allocate any fish to any one user group. Fish returning to our hatcheries pass through many districts on their way to the natal hatchery. The BOF produced a Management and Allocation plan based on PWSAC's salmon production. I think it important that the BOF also understand that when PWSAC sets its annual budget that portions of that budget are funded through the cost/recovery fishery in the hatchery SHA and on occasion in the THA. PWSAC strives to cost recover portions of the budget from hatchery returns based upon the cost to operate those hatcheries that contribute most to a particular gear type. For example, pink salmon are caught primarily by the purse seine fleet. Thus, the cost to operate the pink salmon hatcheries will come from selling pink salmon. These fish would otherwise be caught by the purse seine fleet. Conversely, the gillnet fleet primarily harvests sockeye salmon returning to Main Bay and Gulkana hatcheries and chum salmon returning to Wally Noerenberg Hatchery. The cost to operate those hatcheries will come from those species that would otherwise be caught by the gillnet fleet.

During its yearly spring budgeting process PWSAC examines ADFG five year rolling average catch data as called for in the enhanced salmon allocation plan and addresses imbalances in the plan when feasible by shifting part of the cost recovery burden from one gear group to the other, at times up to two million dollars. Taking action on proposals 47 and 49 would complicate the budgeting process currently in place as well as 5 AAC 24.370(g).

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Prince William Sound
Aquaculture Corporation

I also need to point out that PWSAC has the intention of replacing the chum salmon being stocked at AFK hatchery with pink salmon following the schedule that was provided to us by the Alaska Department of Fish and Game (ADF&G), which will phase in pink salmon production and phase out chum salmon production over four years. The pink salmon egg take number at the AFK hatchery was increased in 2017 and the chum salmon egg incubation number was reduced. A further increase of pink salmon egg take numbers is expected to occur in 2019 at which time chum salmon eggs will no longer be incubated at that facility.

Proposal 48, addresses action that currently is made by emergency order through ADF&G to allow the harvest of enhanced salmon. As mentioned earlier, PWSAC is planning to end the chum salmon enhancement program at the AFK hatchery in the SW District of Prince William Sound according to the schedule provided by ADF&G. Changing this regulation would become obsolete once chum salmon stop returning to the AFK hatchery. However, if ADF&G prefers this change it would not impact PWSAC operations.

Thank you for allowing PWSAC to comment on these three proposals. I will be attending the BOF meeting in Valdez and would be available to provide more information at that time if needed.

Sincerely,

 for

Timothy Moore
Board President
Prince William Sound Aquaculture Corporation

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Board of Fish 2017 Written Comment

Mr. Chair and Board Members,

Thank you for the opportunity to comment prior to the upcoming 2017 Board of Fish Meeting. My name is Forest Jenkins and I currently live in Trempealeau, Wisconsin. I am the current Prince William Sound Setnetter's Association President, and I have been an active PWS setnet permit holder for 5 years. Prior to purchasing my own permit, I was a setnet crew member for 5 seasons in the Eshamy District.

On behalf of the Prince William Sound Setnetter's Association, we cohesively oppose Proposals 42-45. Comments on these proposals are on behalf of the PWSSA.

Due to Wild Coghill Sockeye escapement concerns, below average Copper River Sockeye returns, and weak Main Bay Hatchery Sockeye returns over the 2016 and 2017 seasons, there has been a drastic increase in the concentration of both set and drift gillnet gear within the Main Bay Subdistrict. As a result, this has intensified the competition and gear conflict within this area. These factors should be looked at alongside these Proposals to have a greater understanding of the issues that triggered the submission of these profound proposals. These proposals would only increase this intensified level of conflict and suppress the set gillnet harvest dramatically.

Proposal 40: Neutral. I completely understand the author's motive for writing Proposal 40 in order to reduce conflict between the set and drift gillnet gear groups. I too have experienced a great deal of conflict with members of the drift gillnet fleet creating stationary sets directly in front of a setnet. I believe law enforcement does need a straight forward avenue to addressing this issue, but I do see potential challenges in enforcing this proposed regulation change. If, in fact, current law enforcement approves this change to be a suitable way to enforce this issue, I would support Proposal 40.

Proposal 41: Oppose. The suggested regulation change to allow drift gill nets to be deployed inside the shore end of a setnet is unnecessary, unenforceable, and significantly increases conflict between gear groups. Depending on the tide fluctuation and water depth, it would be very difficult to determine which set gillnets had legal waters inside their shore end. Determining this definition of a pinnacle in such a dynamic environment is an unnecessary responsibility to be placed on law enforcement. The challenges that protection officers would be presented and the high potential for escalated gear conflict are not worth the very little, if any, benefit to the drift fleet that is being requested by the author.

Proposal 42: Oppose. Proposal 42 is extremely allocative, introduces even more enforcement challenges, jeopardizes the safety of all users, and only intensifies the gear conflict between set and drift gillnet permit holders in an already extremely high conflict area.



The author states that there is a lack of access to traditional beach drifts for the gillnet fleet inside Main Bay. This is blatantly inaccurate, as the drift fleet has sole access to all waters outside the offshore end of a setnet buoy in addition to all the open beach access that is a legal distance from a deployed set gillnet. In the Main Bay Subdistrict outside of the THA, setnet gear must be 100 fathoms apart while drift gear only has to be 25 fathoms from a deployed setnet. This provides the drift fleet with beach access between every setnet site in Main Bay outside of the THA.

CDFU claims that they are losing access to 'traditional' beach drifts. In fact, the majority of the beach access inside the THA has been designated and prioritized for the setnet fleet dating back to the 1984 BOF meetings when the Main Bay Salmon Hatchery Harvest Plan was established (5AAC 24.367). The setnet fleet gave up access to all open waters outside of 50 fathoms within the THA and all waters outside of 100 fathoms in the rest of the Main Bay Subdistrict. In exchange, set netter's are allowed to fish their gear 50 fathoms apart inside the THA, while the distance between set and drift gear was set at 25 fathoms. These regulations were placed with the assumption that drift gear would not be able to be legally set between set nets 50 fathoms apart. This has not been the case, as drifters continually claim that they can legally set between our nets and hold their position within a couple fathoms. Illegally, they essentially become setnetters with the added ability to maneuver their 150 fathom net that runs between our gear back to the beach.

A majority of the beach sites within Main Bay THA have been leased through the State Division of Lands Shore Fishery Lease Program since 1985. This lease program grants us priority access to a 50 fathom section of shoreline that we have staked and annually pay for through the State of Alaska. The suggested change in regulation would essentially delegitimize all lease sites inside of the THA, as drifters would be able to exclusively fish a 10 fathom area on both sides of all setnet sites 50 fathoms apart. This would have devastating consequences on our catch during build ups.

Another major point that should be made is that the build ups in the Main Bay Subdistrict are by no means exclusive to the shoreline. It is quite often that the majority of the harvest takes place off the beach in waters that are not accessible to the setnet fleet. In addition, when the Main Bay Hatchery AGZ is open to the set gillnet gear group, the drift fleet has nearly full access to all the beach sites within the THA as almost all setnet gear is deployed in the AGZ. Under these circumstances, the drift fleet is able to efficiently harvest these build ups with our legally anchored lines and buoys in place (5AAC 39.105 (d) (2)).

In response to the escalated gear conflict that would result from this proposed change in regulation, we strongly recommend increasing the current legal distance between set and drift gear from 25 fathoms to 30 fathoms within the Main Bay Subdistrict. This would eliminate the majority of conflict that takes place during build up openers in Main Bay and would provide law enforcement clarity to efficiently regulate these high conflict build up openers. Our suggested change in regulation would be consistent with the remainder of the district. In 1996, the Board of Fish took action to increase the distance between



setnet and drift gear in the Crafton Island Subdistrict from 50 fathoms to 60 fathoms, while the required distance between setnets remained at 100 fathoms (5AAC 24.335). Prior to this change, drifters were attempting to fish a perfect line between setnets 100 fathoms apart. Board of Fish took action to eliminate this ambiguity in regulation and reduce the gear conflict in the Crafton Island Subdistrict. We hope you consider following the precedent and increase the required distance between setnets and drift nets from 25 fathoms to 30 fathoms in the Main Bay Subdistrict.

CDFU also requests that no set gillnet may exceed 50 fathoms in length in the Main Bay Subdistrict. We strongly oppose this as it would be extremely allocative and is solely intended to reduce the harvest levels of setnet permit holders. Contrary to CDFU's original request in this proposal, the removal of all 100 fathom setnets in the Main Bay Subdistrict would force setnet permit holders to occupy more beach area by staking out two sites for 50 fathom nets, therefore reducing the available beach access for drifters.

Proposal 43: Oppose. Proposal 43 states that a drift operation should not be deemed illegal upon deployment of a set gillnet, and the drift operation must have time to retrieve its gear and/or navigate to legal waters after the setnet has been deployed. This request for additional regulation is unnecessary, unenforceable, and would provide freedom for the drift operation to take as long as they wanted to retrieve their gear from the illegal waters after the setnet gear had been deployed.

The author of this proposal states 'The Board of Fisheries intentions to maintain access (to the Main Bay Sockeye build ups) for the drift fleet has been slowly eroded as enforcement does not focus efforts to keep setnet crews from operating and deploying gear during openers.' First of all, the clause about preventing setnet crews from operating and deploying gear during openers is a completely separate issue that is addressed in Proposal 44. Despite this, I would like to clarify that current law allows setnet crews to operate and deploy gear (see 5AAC 39.107d). They mention how their access to Main Bay build ups has been slowly eroding away. Just to be clear, the build ups in Main Bay are not strictly confined to the beach sites. Often the fish are off the beach in deeper water on the build up openers and as setnetters we cannot access these fish with our stationary gear. The drift fleet has exclusive access to the waters beyond our offshore buoys, in addition to all the beach access in Main Bay that is a legal distance from deployed setnet gear.

When we enter this fishery, either as setnetters or drifters, we understand the attached pros and cons of each gear type. As setnet permit holders, we understand that we are limited by our stationary gear, but we also see the benefit of potentially obtaining protected beach access. In fact, the majority of the active sites within the Main Bay Terminal Harvest Area are leased through the Alaska Shore Fisheries Lease Program by setnet permit holders. These leases provide us with first priority to the corresponding shore fishery sites. We cannot move offshore or to another district when the fishing is poor at our beach sites, as drifters have the ability to do at any time.



The author of Proposal 43 mentions that 'a drift operation must be able to retrieve its gear if it is deployed before a set net is deployed.' The setnet gear group does not prevent the drift fleet from retrieving their gear. Once we have our gear in the water, it is the responsibility of the drift gear operator to promptly pick up their gear and relocate to legal waters. On opening sets in Main Bay when gear is simultaneously deployed, as soon as a setnet is in the water there shall be no drift gear within 25 fathoms of the setnet gear, except in the zone outside the offshore buoy of the set gillnet.

If Proposal 43 were to pass, it would allow drift gillnet operators to become setnetters with 150 fathoms of gear laid out on the beach. It would be up to the fishermen to decide when they had to move to legal waters. It would be a burden on law enforcement to attempt to enforce this proposal. This proposal would allow both set and drift gear to be deployed concurrently in waters that would by law be illegal to the drift operator.

We ask that you not approve Proposal 43, as it would dramatically increase gear conflict, it is unenforceable, and it would jeopardize the safety of all users.

Proposal 44: Oppose. Proposal 44 proposes that the operation of each set gillnet and drift gillnet must be performed or assisted by a Commercial Fisheries Entry Commission permit holder in the Prince William Sound Area commercial salmon fishery. This proposal is invalid, as 5 AAC 24.331 (b)(3) is already enforced as intended in the current regulations. For stationary gear, the definition of fishing site and an explanation of performing or assisting is provided in 5 AAC 39.107 (d).

The proposal states that there is a 'lack of enforcement of Section G that requires a permit holder to be present to perform or assist.' This statement is inaccurate. Under current regulations, setnet permit holders are considered present as long as they are present at the specific fishing sites, traveling to and from other gear, traveling to deliver fish, or in any structure used for shelter in the support of the operation of net gear or other stationary gear. Under all of these circumstances, the setnet permit holder is performing or assisting the operation of the setnet gear.

The author of Proposal 44 also suggests that setnet crew members are illegally setting nets and working the gear. This again is inaccurate. Under current law, setnet crew members are allowed to set nets and work the gear, as long as the permit holder is performing or assisting in any of the ways defined in 5 AAC 39.107 (d). These regulations for stationary gear are consistent and enforced as intended in all commercial setnet fisheries across the state.

Regardless of the current regulations, Proposal 44 intends to restrict the setnet operations to set and work all gear out of one boat with the current permit holder present in that skiff. This idea is both extremely allocative and significantly jeopardizes the safety of the setnet fleet. Restricting us to operate out of one skiff and no longer allowing crew members to set and work gear would force us to unsafely travel with 150 fathoms of gear in our skiff. Setting and pulling gear would also be much more dangerous and time consuming with all 150 fathoms of gear in one boat. This proposal



is extremely allocative, as we would be limited to only deploy 50 or 100 fathoms of stationary gear on the opening set, while drifters would be allowed to set and manipulate a full 150 fathoms. During build ups within the Main Bay Terminal Harvest Area, this proposal would deny setnet permit holders two thirds of their beach access. By the time our first 50 fathom net was set, our other beach sites would already be occupied by multiple drift gillnetters, making it impossible to deploy our second and third nets. As a result, this would also drastically increase gear conflict.

We ask you to not approve Proposal 44, as the current regulations are clearly defined and enforced as intended, and the author of the proposal is requesting regulation changes that would have significant effects on allocation, gear conflict, and the safety of all participants.

Proposal 45: Oppose. The suggested regulation change to limit setnet permit holders to only four setnet sites deployed with lines and buoys is unnecessary, unprecedented, and significantly jeopardizes the safety of setnet operators.

CDFU falsely states that there has been a marked increase in unused set net sites throughout the Eshamy District that preclude the drift fleet from historic beach area. Since the start of this fishery in 1983, the number of setnet permits has remained the same and users have historically had multiple sets of anchors, lines, and buoys deployed throughout the district to ensure the flexibility to fish regardless of the opener and weather. There has been a misconception over the last two seasons that there are more unused setnet sites throughout the district, but this is directly related to the frequent openers that restricted us all to the Main Bay Subdistrict and concentrated the number of setnet sites marked with lines and buoys. With all of our lines and buoys in place, the drift fleet was still able to efficiently harvest the build ups. Specifically when the AGZ was open to setnetters and nearly all users had their setnets deployed in the AGZ, the drift fleet was able to effectively harvest the build ups with all of our lines and buoys in place.

CDFU claims that the beach access is historically tied to the drift fleet. This is so far from the truth. Historically, since the inception of this fishery, setnetters have been given priority access to these beach sites, and it is understood that many of these beach sites are registered lease sites with the Alaska State Division of Lands Shore Fishery Lease Program.

Across the State of Alaska, there is no other setnet district with regulation that limits the number of anchored or staked setnet sets allowed per permit holder for operation. This proposal has been submitted in similar fashion in multiple BOF meetings in the past, and repeatedly has been shot down due to safety and gear conflict concerns.

In order to relocate during openers and to have the flexibility to fish all openers, it is essential that we have our lines and buoys in place at all times. Under poor weather conditions, it would be unsafe for us to be raising and lowering sets to be able to fish the upcoming opener. In the case of emergency announcements, we must have multiple sets to give us options to be able to fish under the current management.



Without our raised lines and buoys in place, a drift vessel would be able to fish over the top of our sunken sets. If we needed to relocate to this staked beach site, enforcement would be put in the hands of the setnet fishermen to request the drift vessel to remove his or her gear in order for us to raise our set. The drift permit holder would then determine when it was in his or her best interest to pick up their gear and relocate to open waters, while we would be wasting valuable fishing time with our net out of the water.

Historically, drifters have been able to efficiently harvest their catch with our raised lines and buoys in place. This proposal is only directed to jeopardize the harvest levels and efficiency of the setnet permit holders, while seeking an advantage for the drift fleet. There is no regulation change necessary in response to this proposal.

Proposal 48: Oppose. We request returning this fishery to a cost recovery fishery as it was intended. Against the goals of the current allocation plan, the seine fleet has been able to target and harvest threatened Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye (5AAC 24.370). Other districts in the Sound have been strictly managed due to the shortfall of these stocks, while the seine fleet has been able to intercept these wild and allocated sockeye. This chum fishery is out of regulation and should remain closed, including the THA and SHA, prior to July 18th to protect the Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye.

Proposal 49: Support Option 1. We request returning this fishery to a cost recovery fishery as it was intended. Against the goals of the current allocation plan, the seine fleet has been able to target and harvest threatened Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye (5AAC 24.370). Other districts in the Sound have been strictly managed due to the shortfall of these stocks, while the seine fleet has been able to intercept these wild and allocated sockeye. This common property chum fishery is out of regulation and should remain closed, including the THA and SHA, prior to July 18th to protect the Wild Coghill Sockeye and fully allocated Main Bay Hatchery Sockeye.

exception to legal methods for subsistence fishing is rod and reel. Because they are used to being allowed to harvest hundreds of fish throughout the year by all other methods it should not be remarkable that they may not even think about it the very few times they may harvest fish with rod and reel. However, some of them have been subject to law enforcement actions over the years due to their lack of a license.

A similar allowance is provided on the northern Seward Peninsula.

PROPOSED BY: Kotzebue Sound Fish and Game Advisory Committee (EF-C15-028)

PROPOSAL 142 – 5 AAC 01.220. Lawful gear and gear specifications. Change the dates gillnet gear may be used in the South Fork and Middle Fork of the Koyukuk River from November 1 through June 30 to August 20 through June 30, as follows:

5 AAC 01.220(f)(8) is amended to read:

Gillnets three and one-half inches, (current size restriction), may be used only from August 20–June 30.

What is the issue you would like the board to address and why? Change the open period for when subsistence gillnet may be used in the Middle and South Fork permit area, from the current November 1 to June 30 season, to August 20 to June 30. This proposal would still protect salmon when present but allow fall harvest of whitefish, grayling, suckers, and pike. I collected salmon samples under ADF&G Commissioner's permit from 2010 to 2013, for the Genetic Conservation Lab. I found only summer chum and Chinook salmon present in the upper Koyukuk drainages from July 15 to August 15. I found no fall chum or coho in the Middle or South fork drainage.

PROPOSED BY: Jack Reakoff

(EF-C15-029)

(OK'd. Proposal)

PROPOSAL 143 – 5 AAC 01.244. Minto Flats Northern Pike Management Plan. Reduce the bag and possession limit of northern pike in the Minto Flats Northern Pike Management Plan, as follows:

Amend 5 AAC 01.244(b)(2)(B) Minto Flats Northern Pike Management Plan to read:

(B) there is no daily or annual bag limit, except that in the area described in (G) of this paragraph, the bag limit is 5 [10] fish and the possession limit is 5 [20] fish and any fish that exceeds 30" will be handled carefully and immediately returned to the river.

What is the issue you would like the board to address and why? My concern is with the reduced population of pike in Minto Lakes as evidenced by the poor results of summer bait and fly fishing. I'm especially aware of the slow decline over the past 15 years. As a cabin owner and constant visitor to Minto for over 50 years, it's obvious to me that there

Submitted by Reed Monstey

is an issue. I believe that the main issue is the subsistence fishery in the Chatanika Special Harvest Area (SHA) that is really a glorified sports fishery that occurs during the winter. After the lakes freeze, the pike migrate to the confluence of Goldstream and the Chatanika. Due to this concentration, the fishing is easy and the fish plentiful. Fishermen are high-grading and taking the larger, female pike and that has a large consequence on the overall population of pike in the system. Of the 80 permits that were issued in 2014/15, 300 pike were reported as taken. Since most of these were large pike, those were mostly female spawners. The average catch for the past 15 years, as reported, exceeds 500 fish per year -that's a minimum of 7,500 large fish gone, which increases significantly when you consider that many of these are the spawning females.

Minto used to be a wonderful fishing experience for the hundreds of people from the Fairbanks North Star Borough who fly or boat into the Lakes each summer. Now, 80 people (permit holders) are allowed to effectively destroy the largest pike fishery in the United States. That's not right or o.k. If thru-the-ice fishing isn't reduced, the population will continue to decline from the low it is now, and it will be very difficult to recover based on the fact that it takes 15 to 20 years to grow a large pike.

My ideal solution would be to close the winter pike fishery down in the Chatanika SHA for 10 to 15 years. I understand that you cannot close subsistence fishing without also closing sport fishing, so at a minimum I would like to see the bag limit and possession limit the same as sport fishing and size restrictions in place to help protect the larger females.

PROPOSED BY: Marv Hassebroek

(HQ-F15-086)

PROPOSAL 144 - 5 AAC 01.220. Lawful gear and gear specification. Allow the use of five and one-half inch mesh gillnets across an entire channel in portions of the Koyukuk River for the purpose of targeting northern pike, as follows:

We would like to be able to continue to fish the way we once did, and be able to put a gill net across the entire channel of some waterways. There is a current season that allows us to use smaller mesh nets in the drainage, but we would like to be able to use larger mesh to target larger pike as the smaller mesh does not allow us to effectively catch the larger pike. We would like to do this in the spring when pike are moving out of the lakes and into the rivers.

We would like to be able to use up to a 5 ½ in. mesh until June 15 in Racetrack Slough off of the Koyukuk River as well as sloughs attached to the Huslia River. We would like to be able to use the larger mesh sizes across the entire slough. Since the intent of this is to target larger fish, the idea behind using the larger sized mesh is to allow the smaller whitefish to pass through the net unmolested.

What is the issue you would like the board to address and why? There are too many pike in parts of the Koyukuk River drainage. Pike are excellent predators and this is leading to a potential decrease in salmon smolt survival, as well as less small mammals and waterfowl.

(STAFF COMMENTS)

11-20-16 0556

PROPOSAL 143 – 5 AAC 01.244. Minto Flats Northern Pike Management Plan.

PROPOSED BY: Marv Hassebroek.

WHAT WOULD THE PROPOSALS DO? This would reduce the subsistence bag and possession limit of northern pike in the Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to the Fairbanks Nonsubsistence Area Boundary (referred to as Chatanika SHA by proponent) from 10 fish per day and 20 in possession, to five fish per day and five in possession. Additionally, all northern pike 30 inches or longer would have to be returned to the water alive.

WHAT ARE THE CURRENT REGULATIONS? The subsistence fishing bag limit is 10 northern pike per day, with 20 in possession in the Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to the Fairbanks Nonsubsistence Area Boundary. There is no size limit on northern pike retained in the subsistence fishery.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Subsistence fishing bag and possession limits for northern pike would mirror the sport fish regulations found in 5 AAC 74.044 (b)(2)(B). This would also require subsistence fishermen to release northern pike over 30 inches long, which is more restrictive than the sport fishing regulations in 5 AAC 74.044 (b)(2)(B). The harvest of northern pike may decrease a small amount.


BACKGROUND: The Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to the Fairbanks Nonsubsistence Area Boundary (Figure 143-1) is a popular northern pike subsistence fishing area due to the concentration of an overwintering population and good winter trail access. In 2010, the board established a subsistence bag limit of 10 northern pike per day, with 20 in possession for this portion of the Chatanika River. This area is open to sport fishing from June 1 to October 14, and the sport fish bag and possession limit is five fish per day, only 1 of which may be 30 inches or longer.

The Minto Flats northern pike subsistence and sport fisheries are managed in accordance with the *Minto Flats Northern Pike Management plans* (5 AAC 01.244 and 5 AAC 74.044). The purposes of the plans are to manage stocks consistent with sustained yield principles, provide a reasonable opportunity for the priority subsistence fishery, and provide a sport fishing opportunity. Under the management plan, the exploitation rate of northern pike by all users may not exceed 20% annually. If 750 or more northern pike are harvested from the Chatanika River drainage upstream of the confluence on the Chatanika River and Goldstream Creek after January 1, the sport fishery bag and possession limit will be reduced to two fish for the remainder of the calendar year. If 1,500 or more northern pike are harvested from this portion of the Chatanika River drainage after January 1 until these waters are free of ice, the winter fishery will be

closed for the remainder of the winter season. The majority of the subsistence harvest occurs in mid-February to mid-April.

The most recent population estimate of 16,045 northern pike over 16 inches long in Minto Flats was made in 2008. Based on this estimate, a 20% exploitation rate is equal to a harvest of 3,209 northern pike. The recent 5-year average annual combined subsistence and sport harvest of northern pike was 774 fish (Table 143-1), which is below the maximum 20% exploitation rate specified in the *Minto Flats Northern Pike Management Plan*. Since 2010, when the bag and possession limit was implemented in the Chatanika River drainage upstream of the confluence on the Chatanika River and Goldstream Creek, the subsistence northern pike harvest has not met or exceeded the 750 or 1,500 fish management action trigger points. Therefore, the current subsistence harvest levels and exploitation rate are consistent with the sustained yield principles in the management plan.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative aspects of this proposal. However, current regulations are maintaining the harvests at a sustainable level and there is no need to further restrict subsistence users. While the proposed harvest bag and possession changes would mirror current sport fishing regulations, the size limit would be more restrictive than sport fishing regulations. The board should consider whether adoption of this proposal still provides a meaningful priority for subsistence fishing, and a reasonable opportunity for success in taking northern pike for subsistence uses.

 **COST ANALYSIS:** Approval of this proposal may result in additional direct costs for a private person to participate in the subsistence fishery if multiple trips are required to harvest similar amounts of pike for subsistence uses.

SUBSISTENCE REGULATION REVIEW:

1. Is this stock in a non-subsistence area? Yes, these northern pike stocks likely migrate through the Fairbanks Nonsubsistence Area (5 AAC 99.015(a)(4)).
2. Is the stock customarily and traditionally taken or used for subsistence? Yes: the board determined that freshwater fish species, including sheefish, whitefishes, lamprey, burbot, sucker, Arctic grayling, northern pike, and chars are associated with customary and traditional uses in the Yukon Area (5 AAC 01.236(a)(2)).
3. Can a portion of the stock be harvested consistent with sustained yield? Yes.
4. What amount is reasonably necessary for subsistence uses? While not in regulation, in 1997, the board found that 133,000 – 2,850,000 pounds of freshwater fishes was the amount reasonably necessary for subsistence uses in the Yukon Area.
5. Do the regulations provide a reasonable opportunity for subsistence uses? This is a board determination.

6. Is it necessary to reduce or eliminate other uses to provide a reasonable opportunity for subsistence use? This is a board determination.

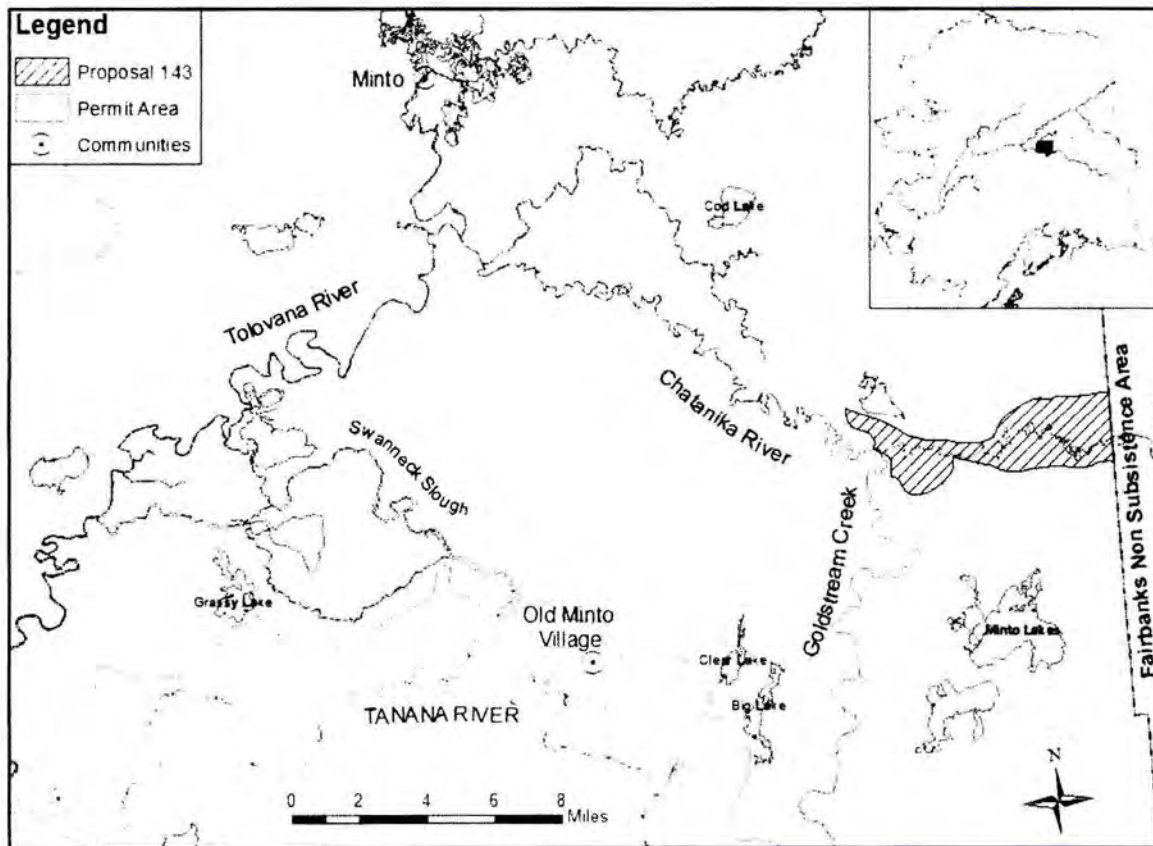


Figure 143-1.—Minto Flats northern pike subsistence fishing area.

Table 143-1.—Subsistence and sport fishing harvest of northern pike in Minto Flats complex^a, 2004–2015.

Year	Permits Issued	%Permits Returned	Subsistence Harvest	Sport Harvest	Total Harvest
2005	79	87%	386	2,052	2,438
2006	101	96%	788	1,204	1,992
2007	118	92%	1,837	1,809	3,646
2008	146	93%	1,339	386	1,725
2009	112	96%	563	873	1,436
2010	96	94%	115	609	724
2011	70	99%	100	422	522
2012	73	93%	525	412	937
2013	77	96%	231	382	613
2014	106	99%	478	597	1,075
2015 ^b	104	13%	383	ND	383
Total	1,756	ND	14,325	12,070	26,395
2010–2014 Average	84	96%	290	484	774
2005–2014 Average	98	95%	636	875	1,511

Note: ND = no data.

^a Minto Flats complex includes Minto Flats lakes and flowing waters, Tolovana River drainage, and the Lower Chatanika River.

^b Data are preliminary and based on weekly call-ins. Permits expire 12/31/2015.

(4) all finfish other than salmon and herring, in the salt waters of the Yukon Area.

(b) The board finds that in the Yukon Area the following amounts of fish are reasonably necessary for subsistence uses:

- (1) king salmon: 45,500 — 66,704;
- (2) summer chum salmon: 83,500 — 142,192;
- (3) fall chum salmon: 89,500 — 167,900;
- (4) coho salmon: 20,500 — 51,980;
- (5) pink salmon: 2,100 — 9,700. (Eff. 5/15/93, Register 126; am 6/10/98, Register 146; am 6/17/2001, Register 158; am 5/19/2004, Register 170; am 7/13/2012, Register 203; am 4/13/2013, Register 206)

Authority: AS 16.05.251

AS 16.05.258

5 AAC 01.240. Marking and use of subsistence-taken salmon. (a) Repealed 8/14/87.

(b) Repealed 6/10/98.

(c) In Districts 1 — 3, from June 1 through July 1, a person may not possess king salmon taken for subsistence uses unless both tips (lobes) of the tail have been removed before the person conceals the salmon from plain view or transfers the salmon from the fishing site. A person may not sell or purchase salmon from which both tips (lobes) of the tail fin have been removed.

(d) In the Yukon River drainage, king salmon must be used primarily for human consumption and may not be targeted for dog food. Dried king salmon may not be used for dog food throughout the Yukon River drainage, except that whole fish that are unfit for human consumption, scraps, and fish under 16 inches in length may be fed to dogs. Whole king salmon caught incidentally during a subsistence salmon fishery in the following time periods and locations may also be fed to dogs:

(1) after July 10, in the Koyukuk River drainage;

(2) after July 20, in District 6 and the Tanana River drainage;

(3) after August 10, in Subdistrict 5-D, upstream of Circle City. (In effect before 1986; am 4/18/86, Register 98; am 8/14/87, Register 103; am/readopt 5/15/93, Register 126; am 6/10/98, Register 146; am 7/21/99, Register 151; am 6/17/2001, Register 158; am 5/29/2001 — 9/25/2001, Register 158; am 8/24/2002, Register 163; am 6/7/2007, Register 182)

Authority: AS 16.05.251

AS 16.05.258

Editor's note: At its February 23 — 27, 1993 meeting, the Board of Fisheries readopted 5 AAC 01.240(b) in its entirety without change, under ch. 1, SSSLA 1992 (the 1992 subsistence law), which repealed and reenacted AS 16.05.258.

5 AAC 01.244. Minto Flats Northern Pike Management Plan. (a) Northern pike stocks in the lakes and flowing waters of the Minto Flats

support both subsistence and sport fisheries. The purpose of this management plan is to provide the department with guidance to achieve the goals of managing these stocks consistent with sustained yield principles, providing a reasonable opportunity for the priority subsistence fishery, and providing a sport fishing opportunity. The Minto Flats northern pike management plan for the sport fishery is set out in 5 AAC 74.044.

(b) The department shall manage the Minto Flats northern pike subsistence fishery as follows:

(1) the maximum exploitation rate of northern pike in the lakes and flowing waters of the Minto Flats by all users may not exceed 20 percent annually;

(2) the following provisions apply to the harvest of northern pike in the Minto Flats area subsistence fishery:

(A) the open fishing season is from January 1 through December 31;

(B) there is no daily or annual bag limit, except that in the area described in (G) of this paragraph, the bag limit is 10 fish, and the possession limit is 20 fish;

(C) a person must obtain an ADF&G subsistence harvest permit before participating in the subsistence fishery and must have that permit in possession when participating in the fishery;

(D) gillnets may be used only from April 15 through October 14;

(E) a hook and line attached to a rod or pole may be used only when fishing through the ice;

(F) in the Chatanika River drainage, from the confluence of the Chatanika River and Goldstream Creek to an ADF&G regulatory marker approximately three river miles upstream of the confluence, subsistence fishing through the ice is closed;

(G) in the Chatanika River drainage, from an ADF&G regulatory marker approximately three river miles upstream of the confluence of the Chatanika River and Goldstream Creek to an ADF&G regulatory marker at the boundary of the Fairbanks Nonsubsistence Area (approximately one mile downstream from Murphy Dome Road).

(i) only single hooks may be used; and

(ii) if the subsistence harvest reports indicate that 1,500 or more northern pike have been harvested during the period from January 1 until these waters are free of ice, the commissioner shall close, by emergency order, these waters to fishing for northern pike through the ice. (Eff. 5/9/98, Register 146; am 6/17/2001, Register 158; am 3/14/2009, Register 189; am 5/19/2010, Register 194; am 5/22/2016, Register 218)

Authority: AS 16.05.060
AS 16.05.251

AS 16.05.258

5 AAC 01.245. Restrictions on commercial fishermen. (a) Repealed 6/10/98.

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(C) allowing single-hook, artificial lures only or no bait, or both;

(D) allowing catch-and-release fishing only;

(E) a complete closure of the fishery.

(d) Special management waters are waters designated by regulation of the Board of Fisheries, where harvests are within sustained yield levels and where the management objectives include higher stock abundance or a need for a higher percentage of trophy-sized fish. Within special management areas, if the department determines that management objectives will not be met under existing regulatory provisions, the commissioner may, by emergency order, close the fishery and immediately reopen a fishery during which one or more of the following management measures apply:

(1) reduced fishing season;

(2) special gear restrictions;

(3) alternative size limits;

(4) catch-and-release fishing only.

(e) The department shall minimize potential conflicts with a subsistence fishery, or other fisheries that overlap the sport fishery, that harvest other fish within the same body of water. (Eff. 3/14/2009, Register 189)

Authority: AS 16.05.060

AS 16.05.251

5 AAC 74.044. Minto Flats Northern Pike Management Plan. (a) Northern pike stocks in the lakes and flowing waters of the Minto Flats support both subsistence and sport fisheries. The purpose of this management plan is to provide the department with guidance to achieve the goals of managing these stocks consistent with sustained yield principles, providing a reasonable opportunity for the priority subsistence fishery, and providing a sport fishing opportunity. The Minto Flats northern pike management plan for the subsistence fishery is set out in 5 AAC 01.244.

(b) The department shall manage the Minto Flats northern pike sport fishery as follows:

(1) the maximum exploitation rate of northern pike in the lakes and flowing waters of the Minto Flats by all users may not exceed 20 percent annually;

(2) the following provisions apply to the harvest of northern pike in the Minto Flats area sport fishery:

(A) the open fishing season is from June 1 through October 14;

(B) the daily bag and possession limit is five fish per day, only one of which may be 30 inches or more in length;

(C) if the subsistence harvest reports indicate that 750 or more northern pike have been harvested from the Chatanika River drainage upstream of the confluence of the Chatanika River and Goldstream Creek during the period from January 1 until these waters are free of ice, the commissioner shall reduce, by emer-

gency order, the daily bag and possession limit to two fish per day, only one of which may be 30 inches or more in length, in the lakes and all flowing waters of the Minto Flats area for the remainder of the calendar year; and

(D) in the Chatanika River drainage upstream from the confluence of the Chatanika River and Goldstream Creek to an ADF&G regulatory marker located at the boundary of the Fairbanks Nonsubsistence Area (approximately one mile downstream from the Murphy Dome Road), only single hooks may be used. (Eff. 3/14/2009, Register 189; am 5/19/2010, Register 194)

Authority: AS 16.05.060

AS 16.05.251

5 AAC 74.055. Tanana River Area Wild Arctic Grayling Management Plan. (a) By employing a conservative harvest regime, the department shall manage wild Arctic grayling populations in the Tanana River Area for long-term sustained yield. Following sustained yield principles, the department may manage wild Arctic grayling fisheries to provide or maintain fishery qualities that are desired by sport anglers.

(b) In a sport fishery covered by this management plan, the commissioner, by emergency order, may take one or more of the management actions specified in this subsection if there are conservation or biological concerns for the sustainability of the fishery or for a stock harvested by that fishery. The concerns must arise from harvest, effort, or catch data for that fishery which has been derived from statewide harvest survey data, on-site creel survey data, stock status data, stock exploitation rates, or from inferential comparisons with other fisheries. The management actions are as follows:

(1) reduce the bag and possession limits;

(2) reduce fishing time;

(3) allowing only catch-and-release fishing;

(4) modify methods and means of harvest.

(c) To achieve sustained yield and provide diverse fishing opportunities, the board and department will manage wild Arctic grayling fisheries under one of three management approaches. The three management approaches are the

(1) regional management approach;

(2) conservative management approach; and

(3) special management approach.

(d) Regional management approach. Under the regional management approach, sport anglers may use baited or unbaited artificial lures and the bag and possession limit is five fish. The season is open year round, however there are fisheries where catch-and-release is imposed during part or all of the spawning period from April 1 through May 31.

(e) Conservative management approach. Under the conservative management approach, sport anglers may use baited or unbaited single-hook artificial lures. The bag and possession limit is two fish.



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Submitted On

11/15/2017 2:52:34 PM

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Other than this past year, I have fished from a boat on the Copper River the last 5 or 6 years. It's a resource that I hope you don't take away from me. I'm a disabled veteran and am limited to what I can do. This is how I fill my freezer for the year. Please don't take this away from me. The numbers are cyclic, but I would ask you lower the commercial quotas instead. We don't make money on what we catch, they do. We live off of the fish. Thank you for your consideration, Richard Heller



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11/13/2017 9:48:42 PM
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I am in favor of Proposal 10. An Optimum Escape Goal for each species of interest makes sense. That way each species could be managed independently.

I support Proposal 17. Increasing the distance on the Copper River open to PU dipnetting would decrease crowding with changing the allowed harvest.

I also support Proposal 18. Basing the dipnetting openings on actual fish counts by sonar makes good management sense, basing the entire season allotment on the size of the early return does not allow for an increase catch if the return surges later.

I oppose Proposals numbered 13, 15, 16, 28, and 36.



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Proposal # 10 Support Better management result ..

Proposal #13 Oppose Political

Proposal # 15 Oppose Political

Proposal # 16 Oppose Political

Proposal # 17 Support Results in better management

Proposal # 18 Support Results in better management

Proposal # 28 Oppose Political

Proposal # 36 Oppose Political



Submitted By
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With regard to the following proposals, I offer the associated comments:

Proposal 10 (escapement goal): I support this proposal as it appears to be sound rationale and would benefit the fish population as well as providing some rigor on the related management approach.

Proposal 12 (Gear / Live box): I support this proposal as it would ultimately preserve more of the resource (Kings)

Proposal 13 (Prohibit use of boat for dipnetting): I oppose this proposal. The cited justification does not withstand logic: it is asserted that a rapid catchment of a given limit does not allow escapement. Unless all the run will be in the river on one day, this is not logical: If a limit is caught in one day, that fisherman or group will simply not be on the water the next day or the next opening. This proposal appears to be targeted against a particular operator and group of users to favor another group.

Proposal 14 (delayed opening of subsistence / kings): I oppose this proposal. While recognizing the impact of low returns, it appears this proposal is impacting all user groups except commercial fisheries. The preservation of stocks can be accomplished without this proposal by either emergency order or by limiting the commercial harvest.

Proposal 15 (monofilament / gill nets): I oppose this proposal. Weighing possible benefits to drawbacks indicates that the impact on lawful uses far outweighs the effectiveness of this measure. While it is undoubtedly stressful to a fish to be released from a gill net; particularly for kings release from a dip net (of whatever sort) is not going to happen "on the fly" and will likely require substantial work by the fisherman (and attendant stress on the fish) regardless of the type of net. To protect the king stocks, limit the commercial harvest. Most personal use fishermen actively fish when the king run is not overly intermingled with the sockeye run. This proposal would disproportionately impact those users without any proof of benefit to the kings.

Proposal 16 (Records): I oppose this proposal on both a procedural basis and a more pragmatic basis. Procedurally, this proposal appears to target one particular operator without placing a similar burden on other operators that offer a commercial service that is different in nature if not in impact. I recently moved back to Alaska and undertook a personal use fishery as soon as I was eligible. Working from a charter boat, I caught roughly 1/2 of my limit during a 10 hour day. In years gone by, after being dropped off on shore (by a commercial service), I caught my limit in approximately 6 hours.....both were the same limits. Under the current proposal "I" had the same impact on the fishery, but this proposal forces a substantial amount of recordkeeping on one operator without impacting the other. On a practical basis, unlike other fisheries that have limits in the single digits, the personal use fishery could see as many as 45 fish caught by one person....conceivably during a day's outing. The opportunities for error and miscounting are many and would negate any real or perceived benefit to the resource, particularly when compared to the current system wherein strict liability for proper tracking lies where it should, with the individual. At its root, this appears to be a self-serving proposal by the proponents against one operator.

Proposal 17 (expanded Chitina Personal Use subdistrict): I support this proposal as it does not increase the burden on the resource but only allows better use of the available resource by residents.

Proposal 18 (harvest level reduction): I support this proposal. As outlined in the issue statement, the ability to manage harvest / escapement is present without the need to shutdown (or severely limit) an entire fishery for what might be a temporary aberration.

Proposal 23 (Catch and release): I oppose this proposal. It is unclear if the proponents thought through what this would mean or if they intended to propose shutting down an entire region, but that is precisely what the proposal would accomplish. No fishing method (traditional or not, intentional or not) can be certain of not having any unwanted or unintended bycatch. Not allowing catch-and-release would be the same as simply banning fishing.

Proposal 28 (Mandatory closures / mandatory king closures): I support this proposal in part. If an approved plan exists, the proper venue for regulation / management is through the creation of that plan. However, the part of the proposal that reads "Repeal mandatory inside commercial closuresfrom regulation" is too broad. Nothing should be exempt from regulation; instead, regulatory language should be drafted as precisely or as broadly as needed.

Proposal 36 (extended openers): I oppose this proposal. The proponents seem to be making an economic argument along the lines that there has historically been good escapement and more openers are needed to support local economy. However, as seen by the plethora of proposed regulations (whatever the merits of any given regulation), it is clear that not every stakeholder considers the fishery to be

unequivocally healthy. The greatest impact on this fishery is the commercial harvest. Mandating an opening schedule would expose the fishery to its greatest risk of overuse.





#	Proposal	Position	Comments
10	Set an Optimal Escapement Goal for Copper River sockeye salmon of 700,00-1,200,00 to match late run Kenai sockeye OEG... <i>Fairbanks Fish and Game Advisory Committee (FBX F&G AC)</i>	OPPOSE	The proposed OEG is unnecessary for sockeye in the Upper Copper River. The current SEG was established in 2011 and increased the upper end of sockeye spawning escapement from 500,000 to 750,000. Current information on Klutina lake productivity indicates the SEG is more than adequate and possibly promotes over escapement, which in turn reduces opportunity for all users over time.
13	Prohibit using a dipnet from a boat to harvest salmon in the Glennallen Subdistrict ... <i>Ahtna Tene' Customary and Traditional Use Committee</i>	SUPPORT	The ability of a new commercial entrant to classify him/herself as a water taxi/sightseeing operation and advertise and operate as a guide for folks to dipnet a subsistence take of salmon is a perversion. This reallocation to new commercial users serves to pit user groups against each other as the newer commercial operations foment dissent when actually all user groups on the Copper River have benefitted from the stabilizing and run growing effects of abundance based management and limited entry on commercial fisheries.
14	Modify the season dates for the Glennallen Subdistrict subsistence salmon fishery based on the preseason king salmon harvest projection: <i>Wrangell-St Elias National Park Service Subsistence Resource Commission</i>	OPPOSE	Understanding the author's intent to provide an additional management tool it is unwise to attach regulation to a preseason forecast.
15	Prohibit use of monofilament or gillnet mesh in dipnets... <i>Wrangell-St Elias National Park Service Subsistence Resource Commission</i>	SUPPORT	It is time to look at the "improvements" made to dipnet gear over time and make a rational decision on what constitutes a dipnet. This fishery has changed rapidly over the years and the Board should help guide its direction away from the boat driven trawl fishery it is becoming.
16	Require logbooks for all charters operating in PU and Subsistence fisheries... <i>Cordova District Fishermen United</i>	SUPPORT	The commercial fisheries are required to provide timely and accurate harvest reporting at the end of each fishing period. With the available technology it is reasonable to expect upriver fisheries and especially those engaging in commercial activities also be required to adhere to some in season harvest-reporting standard.
17	Extend the lower boundary of the Chitina Subdistrict downstream to the Umanatna River... <i>Chitina Dipnetters Assoc,</i>	OPPOSE	It is amazing the same group that is constantly crying conservation now wants to double their own harvest area. This expansion will further disenfranchise the traditional shore based PU participant for the newer boat driven trawl fishery.



#	Proposal	Position	Comments
18	Repeal the reduction in maximum harvest level in the Chitina Subdistrict Personal Use fishery when the Copper River commercial fishery is closed 13 or more consecutive days... <i>Chitina Dipnetters Assoc. & FBX F&G AC</i>	OPPOSE	This intent of this regulation is to ensure all gear groups share the burden of conservation in times of severely weak salmon returns.
19	Allow salmon to be taken for subsistence purposes at any time between May 1 and November 30 in the Copper River District... <i>John C. Wissel, Native Village of Eyak</i>	OPPOSE	Oppose as written until BOF addresses commercial entity's ability to charter subsistence users upriver and down.
28	Repeal mandatory inside waters commercial salmon fishery closures in the Copper River King Salmon Management Plan... <i>Cordova District Fishermen United</i>	SUPPORT	Mandatory inside closures tie ADFG hands even when run timing, river condition and run strength warrant additional opportunity.
29	Extend inside closure area to ¼ mile off the southern shores of all barrier islands in the Copper River commercial drift gillnet salmon fishery... <i>FBX F&G AC</i>	OPPOSE	I would like to save the BOF time and effort by saying I also oppose proposals 31,32,33,34 that were generated from ADFG erroneous preseason announcement of time and area restrictions and closures of Copper River fisheries, which as the commissioner has stated was wrong.
31	Reduce the maximum depth of drift fill nets in the Copper River District commercial drift gillnet salmon fishery to 29 meshes through the start of Statistical week 24 (end of May) <i>FBX F&G AC</i>	OPPOSE	The departure from the management model using actual data from the commercial fishery, sonar counter and on up the river caused these proposals to be written in haste and in response to a scenario that did not happen. I hope the BOF recognizes this and moves forward through this process without getting lost in the what-ifs.
32	Prohibit commercial salmon fishing in the Copper River District, during the month of May, if the preseason forecast for Copper River king salmon is below the 20-year average or 35,000 king salmon... <i>FBX F&G AC</i>	OPPOSE	Abundance based scientific management creates more opportunity over time for all users groups.



#	Proposal	Position	Comments
33	Prohibit sale of commercially caught king salmon in the Copper River District if restrictions on Copper River drainage subsistence fisheries have been implemented... FBX F&G AC	OPPOSE	
34	Prohibit commercial salmon fishing in the Copper River District until a salmon is recorded at the Copper River Sonar... FBX F&G AC	OPPOSE	
38	Modify purse seine gear length in Prince William Sound Area... Rob Nelson	OPPOSE	The seine fleet is more than adequately efficient already. Seines have grown longer with sewn on leads and the newer wedge not being added in to the measurement, while gillnets remain basically the same as when I started fishing 37 years ago. Under the current PWS Enhanced Salmon Allocation Plan the seine fleet is ahead \$50 million dollars over 11 years from 2006-2016 in PWSAC production.
39	Allow permit stacking and increase the amount of purse seine gear that may be operated from a vessel with two limited entry purse seine permit holders onboard in the Prince William Sound Area commercial fishery... Leroy L. Cabana	OPPOSE	The ability for new entrants into the fishery will be curtailed by this proposal.
40	Establish minimum operation depth for drift gillnet gear fished within 90 fathoms of a set gillnet in the Crafton Island Subdistrict... Michael Brown	OPPOSE	When looking at the 10-year harvest average of the set net gear group in PWS Enhanced Salmon Allocation Plan the set gillnet fleet has exceeded their allocation in almost every year since the plan was enacted. No new restrictions on the gillnet fleet are warranted.



#	Proposal	Position	Comments
42	<p>Repeal maximum length for set gillnet gear in the Main Bay Salmon Hatchery Management Plan and prohibit operation of a drift gillnet within 20 fathoms of a set gillnet...</p> <p><i>Cordova District Fishermen United</i></p>	OPPOSE	<p>Substitute Language for to correct typo in Proposal book is as follows: 5AAC 24.367 Main Bay Salmon Hatchery Harvest Plan. (b) In the Main Bay Subdistrict (1) No portion of a drift gillnet may be operated within <u>20</u> [25] fathoms of a set gillnet, except in the zone...</p> <p>Justification: This would allow a drift gillnet to operate in between two setnet operations in an area that is currently closed. The setnet gear group has consistently exceeded their allocation and this would regain some historic drift gillnet area that has been ceded to the setnet fleet in the last ten years.</p>
43	<p>Clarify Provisions for operation of drift gillnet and set gillnet gear in the Main Bay Subdistrict...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The BOF and ADFG enforcement have been clear in the intent and ability for the drift gillnet to access build-ups of sockeye, which congregate on the beach. A few newer vocal setnet participants have taken to loudly opposing this given mandate of the BOF. Causing stress and undue focus on the cleanup of hatchery production of which the setnet fleet has consistently exceeded their allocation.</p>
44	<p>Specify that operation of each set gillnet or drift gillnet must be performed or assisted by a Commercial Fisheries Entry Commission (CFEC) permit holder in the Prince William Sound Area commercial salmon fishery...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The BOF should address this in light of newer methods used by the setnet fleet having someone without a valid permit to be laying out gear in a competitive opening without any supervision or the permit holder even in the same bay. It is time to make the rules apply to every commercial operation.</p>
45	<p>Limit each CFEC permit holder to no more than four set gillnet sites deployed with lines and buoys in the Prince William Sound Area commercial set gillnet fishery...</p> <p><i>Cordova District Fishermen United</i></p>	SUPPORT	<p>The setnet fleet has cluttered the district with unused lines and buoys. This proposal would bring consistency in amount of lines and buoys dispersed throughout the district and give back access to historic drift gillnet area. Enforcement would also benefit.</p>



#	Proposal	Position	Comments
47	<p>Include the value of all enhanced salmon produced in the Prince William Sound Area in the Prince William Sound Management and Enhanced Allocation Plan...</p> <p><i>Michael Bowen</i></p>	SUPPORT	<p>I believe the BOF needs to create a work group to study and come back with recommendations in 2020 on to address the commercial gear group allocation plan.</p> <p>Currently the seine fleet is \$50 million ahead of the drift gillnet fleet over 11-year period from adoption of the PWS Enhanced Salmon Allocation Plan in 2005. Items to look at include remote release strategies, five year rolling average, COAR value calculation, the inclusion of Silver bay model profits, seine bonuses outside of COAR values which by sheer volume could swing percentages, the setnet trigger, etc are a few items to review and possibly change for industry stability and fairness over time.</p>
48	<p>Allow commercial fishing for salmon in the Armin F, Koernig Hatchery Terminal and Special Harvest Areas prior to July 18...</p> <p><i>Leroy L. Cabana</i></p>	OPPOSE	<p>It is interesting that the wording of the proposal brushes over the intent of the regulation being broken. The department did find that it was illegal for the seine fishery to access this district prior to July 18, but originally said a fishery could be executed by using these fish solely for cost recovery. Then in 2003 the seine fleet was allowed opportunity for directed harvest within the SHA. The SHA was subsequently expanded in area, adding to the illegality and allocative nature of this pre-July 18 seine fishery.</p> <p>I have been to numerous meetings and I support the seine fleet's desire for early opportunity and diversity. A recurrent theme has been that both PWSAC and ADFG say they need direction from the BOF to minimize interception of stocks other than the remote release fish.</p> <p>So I ask the BOF to direct ADFG and PWSAC to minimize interception of all other fish stocks either wild or hatchery in both remote release locations in Prince William Sound.</p> <p>This is ONLY for remote release locations. All other statistical areas no matter which gear group do have some interception of stocks while engaged in their fishery. This is historically accounted for and should be viewed SEPARATELY from remote released stocks, which are intended to not interrupt any historic stock or fishery.</p>
49	<p>Reduce harvest of sockeye salmon in the directed chum salmon fishery prior to July 18 in the Armin F. Koernig Hatchery Terminal and Special Harvest Areas...</p> <p><i>Michael Bowen</i></p>	SUPPORT	<p>Remote release salmon should be harvested with minimum interception of other salmon stocks, either hatchery or natural production, so as not to disrupt historic allocation intent or fishery patterns.</p>



Submitted By

Shirley Moto

Submitted On

11/15/2017 12:55:14 PM

Affiliation

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Wasilla, Alaska 99687

I fish the Chitna area for Red salmon using dipnet, the fish (whole) is used to sustain our diets during the winter by smoking it, canning both smoked and straight (not smoked); freeze packed and salted to pickle... the Salmon is caught both when season opens, spring and summer/fall... none of the salmon is wasted...



From: Steve Aberle
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Comments on BOF PWS Proposal 40
Date: Friday, November 17, 2017 1:34:39 PM

November 16, 2017

Alaska Board of Fisheries
dfg.bof.comments@alaska.gov

Re: PWS Proposal 40

BOF Members:

I am writing to express strong **OPPOSITION** to Proposal 40 which, if enacted, would require drift gillnets operated in the Crafton Island Subdistrict to maintain a distance of 90 fathoms from setnet gear when the shoreward end of the drift gear is set in less than four fathoms of water.

The author of this proposal operates his set net gear almost exclusively in Foul Bay in the Eshamy district. A substantial number of sockeye salmon pass through this bay on the way to neighboring Main Bay and during closures often holds a large buildup of fish.

It can't be disputed that sockeye salmon like to hug the beach and there is very limited opportunity for drift fishermen to fish close to the beach in the Eshamy district because of the preponderance of set gillnets throughout the entire district. This proposal would limit even more the ability of drift fishermen to harvest a fair share of sockeye in the district.

Most drift fishermen fishing close to the beach use range finders to assure a legal distance from set net gear and pick up their gear when any part of it comes within 60 fathoms of a set net operation. Enforcement would not be any easier if this proposal were enacted.

Some set net operators including the author often set "dummy" sets, lines, anchors, and buoys with no net intended to block drift fishermen from legally fishing near the beach.

The set net fleet, 28 permits in all, often catches far above their allotted allocation of sockeyes as can be easily seen in the annual harvest data. This proposal would enhance that catch even more. Since set and drift gillnet cost recovery to pay for hatchery operations is rarely taken at Main Bay and almost exclusively in the Esther Subdistrict, a drift gillnet district only, set net operators essentially get a "free ride" from paying for the operational costs of Main Bay hatchery which grows the sockeye caught in the Eshamy district. They do not need nor deserve the advantages that this proposal would give them.

I urge you to take **NO ACTION** on this proposal.

Sincerely,

Steve Aberle, drift gillnetter



Submitted By
Steve Tucker
Submitted On
11/16/2017 9:01:26 AM
Affiliation

I have reviewed the proposals for the upcoming Valdez meeting in December and have the following comments:

Proposal 10 - Support. An OEG would help support ADFG management decisions.

Proposal 12 - Support. Without either a live well or someone attending the wheel while in operation, there is a possibility of an over catch. While I'm sure it would be unpopular with fish wheel owners, the wheels should be attended and monitored, while running, to ensure the authorized catch limit isn't exceeded.

Proposal 13 - Oppose. This appears to be a thinly veiled means of restricting access to the Copper River fishery. Dipnetting from a boat is still controlled by the individual (or family) subsistence limit. The means of catching is far less important than the potential for overfishing. Dipnetting (from either a boat or the shore) is a selective fishing method and excess kings can easily be released unharmed; however, unmonitored fish wheels with no live well will result in high mortality rates including potential bicartch or over-catch. Lastly, while I would agree that dipnetting is a "traditional" practice, fish wheels are non-indigenous machines introduced in the late 19th century; as such fish wheels are hardly "traditional". To improve fish numbers along the entire Copper River basin, perhaps fish wheels should be more highly regulated, limited, or eliminated.

Proposal 15 - Oppose. The current mesh standards are sufficient. The restrictions in this proposal may eventually lead to widespread non-compliance and the eventual ban of dipnetting altogether.

Proposal 19 - Oppose. Extending the subsistence dates by this much would make it much more difficult to manage the fishery. It would also likely increase enforcement and monitoring costs by ADFG. While dates could, and should, be adjusted annually based on ADFG monitoring, Turing a blanket date on fishing wouldn't be detrimental.

Proposal 20 - Oppose. Tributaries should be considered individually for inclusion or exclusion from subsistence fishing based on conditions and geography specific to each stream.

Applies to multiple proposals: the current subsistence limits of 30/60 is about right. However, the provision to increase the limit to up to 500 per household seems exorbitant. The total allowable subsistence limit needs to be reviewed, and the request provision needs to be amended to require a justification. If large numbers of fish are needed for dog food or other reasons, perhaps collection of post spawning fish from selected areas should be allowed to fill this requirement.



Submitted By
Steven Swartzbart
Submitted On
11/17/2017 2:34:04 PM
Affiliation
Copper River/Prince William Sound Commercial Fisherman

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My name is Steven Swartzbart and I am a second generation commercial fisherman. I started fishing with my father at a very young age on the Copper River and in Prince William Sound. In 2016 at the age of 18 I became the skipper and permit holder of the family drift gillnet boat. Regretfully I am unable to attend the Board of Fish session in Valdez because of prior commitments with college classes. I am thankful for the opportunity to write my comments to the board on some of the proposals I feel strongly about and could greatly impact my life.

Proposal 34

I am writing in opposition of proposal 34. This proposal will limit ADF&G's ability to properly manage the Copper River District commercial fishery. The miles lake sonar is located 33 miles away from the mouth of the Copper. This is a large distance for a fish to travel and is estimated to take about a week for the fish to travel this far up the river. Daily counts can be variable and just in 2017 almost 40,000 fish went by the sonar site in one day. My point here is that there can be a very large number of fish above the commercial fishing boundary lines and below the miles lake sonar station. This proposal could force the commercial fishery to be a week behind the run of fish. It could greatly impact the local economy of Cordova and the fisherman of the Copper River. This will greatly increase the risk of over escapement and will not allow ADF&G to use the commercial fleet as a management tool to determine how many fish are in front of the river.

Proposal 28

I am writing in support of this proposal 28. Lifting this regulation will allow ADF&G to have the freedom to do better in season management. The Copper River in recent years has seen many regulations to protect the kings for all user groups. These king closures are a good tool to be used when needed, but there is no reason to forceable place regulations on the commercial fishery if it is not needed. Lifting this regulation will allow ADF&G to manage the Copper River more effectively and give them the tools to do what is best for the salmon run.

Proposal 31

I am writing in opposition of proposal 31. This proposal would put a tremendous burden on the Copper River District commercial fishery. Commercial fishing nets are very expensive and if this proposal passes it would force every fisherman to construct new nets or greatly modify existing gear. Recent management actions have forced commercial fisherman out of traditional king salmon fishing areas. Reducing our net depth would affect our ability to catch reds and not have a large impact on the catch of kings.

Proposal 32

I am writing in opposition of proposal 32. Preseason predictions have been historically inaccurate. Making firm management decisions before any actual indication of the run strength is not a good way to manage an ever changing fishery. Management should not be forced to make decisions based on predictions of run strength. Management decisions that are made before the actual run have caused tensions in the past. I encourage the Board of Fish to consider the historical inaccuracy of preseason predictions and let the actual number of actual fish decide the management decisions. In season management of the commercial fishery has proven affective in the past, please don't let regulations inhibit ADF&G's ability to manage the Copper River District fishery.

Thank You



It has come to my attention that some one desires to change the ice fishing restriction on the Chatanika river from 3 miles upstream of Goldstream to one mile. I consider this proposal to be ill advised and illogical since the object of this restriction has been to rebuild the seriously depleted Pike stocks in Minto Flats and the Chatanika drainage. I propose, instead, that all ice fishing on the Chatanika and Tolovana Rivers be eliminated until the fishery recovers. My 35 years of, "catch and release", fishing experience in this area, convinces me that the Pike stocks are significantly lower than I experienced in the 80's. If it is politically impossible to defend the overwintering areas I suggest the bag and possession limits for Pike be extended to the subsistence fishery. Pike recruitment and growth rates do not support an unrestricted harvest of the sort I have observed at the mouth of Goldstream.

Stuart Varner



November 14, 2017

Dear Alaska Board of Fisheries,

Thank you for the opportunity to provide comment on Prince William Sound Finfish Proposals that will be decided at the December 1-5, 2017 Board Meeting in Valdez. My comments pertain to Proposals 40-49. Our family has been involved in Alaska commercial fishing operations since the early 1980s. I currently hold a set net permit in the Prince William Sound, Eshamy District and have been fishing that area for more than a decade.

Proposal 40. - RECOMMEND BOARD CONSIDER ALTERNATIVE DESCRIBED BELOW.

Proposal 40 identifies a problem that occurs across the entire Eshamy District. This problem is not limited to the Crafton Island Subdistrict. The problem is that some drift gillnet fishermen are not drifting as required by 5 AAC § 39.105(d)(3). Instead, they are setting, staking, anchoring or otherwise affixing their net to the seabed floor, or are using their engines to keep their net in the same location (sometimes for the entire opener which can be days). Understandably, Mr. Brown (a set gillnetter) is frustrated with continued violations. While there is merit in Mr. Brown's proposal to limit drift gillnet operations to deeper water to make it easier for enforcement personnel to identify and remedy violations, this proposal seeks an allocative change. The PWS Setnetters Association has consistently opposed allocative changes and has recommended the Board oppose allocative changes in the past. Therefore, for Proposal 40 to work, the Proposer would need to explain how this change could be made without impacting allocation. Additionally, it would not be equitable for the Board of Fish to make this change to remedy this problem for only a small number of set gillnetters fishing in the Crafton Island Subdistrict, and not resolve the matter for all set gillnetters across the entire Eshamy District.

This matter should either be resolved through improved Fish and Game Enforcement of existing regulations or be resolved equitably for the entire Eshamy District without allocative impacts.

Proposal 41. OPPOSE.

Proposal 41 requests the Board to allow drift gillnet fishermen to set a drift net from the shoreline to a point inside the start of a set gillnet that is attached to a pinnacle. I oppose this proposal.

Set gillnetters may attach their nets to pinnacles in areas of shallow water, where the large tidal fluctuation in Prince William Sound causes much of their net to be out of water at low tide. This means the water between the shoreline and the pinnacle is typically too shallow for a drifter to "drift." 5 AAC § 39.105(d)(3) states a drift gillnet fisherman must not set, stake, anchor or otherwise affix their net to the seabed floor. Therefore, it is not logical to allow a drift gillnet fisherman to set a net in shallow waters where violations of 5 AAC § 39.105(d)(3) will occur.

I oppose Proposal 41 because it will likely result in drift gillnet violations of 5 AAC § 39.105(d)(3) and exacerbate and compound enforcement problems in the Eshamy District.

Proposal 42. OPPOSE.

Current regulations (5 AAC § 24.367) require set gillnets to be 50 fathoms apart, and prohibit a drift gillnet from operating within 25 fathoms of a set gillnet. Proposal 42 requests the Board to reduce the 25



fathom distance to 20 fathoms. In the past the Board has increased drift gillnet separation distance from set gillnets to reduce conflict, not, decreased this distance. For example, in the Crafton Island Subdistrict, the Board of Fish increased the separation distance from 50 fathoms to 60 fathoms to reduce gear conflict.

I oppose Proposal 42 for the following reasons, it will:

1. Conflict with past Board of Fish precedent;
2. Exacerbate and compound existing gear group conflicts;
3. Disrupt the existing allocation between set and drift gillnet fishermen in favor of drift gillnet fishermen;
4. Further disadvantage set gillnet fishermen by allowing a drift net (150 fathoms long) that is already three times longer than allowed for a set gillnet (50 fathoms) to get even closer to a set gillnet; and
5. Will unnecessarily drain limited enforcement resources.

Current regulations prohibit a drift gillnet fisherman from setting between two set gillnets (set 50 fathoms apart) because it is physically impossible to fish a drift gillnet in between two set gillnets and maintain an exact distance of 25 fathoms from each set net while meeting the obligation to “drift” in accordance with 5 AAC § 39.105(d)(3).

Some drift gillnet fishermen violate existing regulations attempting to “thread-the-eye-of-a-needle” and maintain a 25 fathom separation between two set gillnets. The only way to do this would be to anchor the net in a position exactly 25 fathoms from each set net; yet, anchoring a drift gillnet is illegal. While, mathematically, and physically this is impractical and illegal, it has been persistent enforcement problem, consuming limited enforcement resources.

Enforcement personnel have consistently ticketed drift gillnet fishermen that attempt to fish in between two set nets (set 50 fathoms apart), because it is physically impossible to fish a drift gillnet in between two set gillnetters and maintain an exact distance of 25 fathoms from each set net while meeting the obligation to “drift”.

This same problem occurred in the Crafton Island Subdistrict where drift gillnet fishermen were attempting to “thread-the-eye-of-a-needle” and fish between set gillnets. The Board of Fish resolved this same enforcement problem by increasing the distance between a drift gillnet and a set gillnet, not decreasing the distance (as proposed). In the Crafton Island Subdistrict set nets are required to be 100 fathoms apart. Prior regulation required a 50 fathoms separation between drift gillnet and set gillnets. Gear conflict and enforcement matters became so troublesome, the Board of Fish increased the separation distance to 60 fathoms to make it abundantly clear that no drift gillnet fisherman should ever attempt to set between two set nets (set 100 fathoms apart).

If the Board does decide to modify distance between a drift and set gillnet in the Main Bay area, the distance should be increased from 25 fathoms to at least 30 fathoms to make it abundantly clear that drift gillnet fishermen cannot set their net between two set nets (50 fathoms apart).

Set net fishing locations are already extremely limited in time and area, compared to drift gillnet permits that are allowed to fish a substantially longer season, in multiple areas up to a mile offshore. It is unreasonable for set gillnet operations to be further reduced in time and area.



Proposal 43. OPPOSE.

Proposal 43 requests the Board to allow drift gillnet fishermen an unspecified amount of time to comply with the drift gillnet to set gillnet spacing rule, after a set gillnet is deployed. I oppose Proposal 43.

The proposer appears to be unfamiliar with set net operations, and other state regulations that provide set net fishermen priority use of their leased sites. This proposal is not only problematic because it will exacerbate gear conflict and enforcement matters, but directly conflicts with numerous other state regulations related to set net lease holder priority use.

Set net lease sites are clearly marked with signs posted on land, and with buoys and running lines clearly depicting the planned net location. Set net locations are leased from the Alaska Department of Natural Resources (ADNR). Set gillnet fishermen holding an ADNR lease have priority access to that specific location.

Because set gillnets are typically deployed in 50 fathoms sets, a set gillnet fisherman will move from one set net location to another until all of the nets are fishing. If a drift gillnet fisherman elects to set its net in that location prior to set net deployment, the drift gillnet fisherman must immediately move its net into a legal position after a set gillnet is in the water. The drift gillnet fisherman must take immediate steps to make its net legal.

Proposal 43 would allow a drift gillnet fisherman an unspecified amount of time (hours? days?) to “have time to retrieve its gear and/or navigate to legal waters.” This proposal will make it substantially more difficult for enforcement personnel to know at what point in time a drift gillnet is set illegally.

Significant enforcement problems have occurred where drift gillnet fisherman have refused to move, or take unreasonably long periods of time to move their net. To reduce gear conflict, many set net fishermen take time before an opener to talk to nearby drift gillnet fishermen to let them know where they plan to set and to proactively avoid gear conflict. Despite these cooperative, and proactive steps, some drift gillnet fishermen intentionally set their nets in leased sites, and then refuse to move when a set net is deployed.

Proposal 43 will only muddy enforcement matters.

If a drift gillnet fisherman would like prior access to a set net location, they should invest in a set gillnet permit, and invest in ADNR lease sites.

Set net fishing locations are already extremely limited in time and area, compared to drift gillnet permits that are allowed to fish a substantially longer season, in multiple areas up to a mile offshore. It is unreasonable for set gillnet operations to be further reduced in time and area.

Proposal 44. OPPOSE.

Proposal 44 is gravely flawed. I oppose Proposal 44.

Proposal 44 includes only one portion of the existing Eshamy District regulations for set gillnet operation in isolation (5 AAC § 24.331), while ignoring extensive and long-standing set gillnet regulations listed in 5 AAC § 39.107.

The proposer incorrectly concludes that set gillnet fisherman are currently operating gear “illegally” and falsely accuses Alaska Department of Fish and Game (ADF&G) for failing to enforce existing regulations. However, it is the proposer that is not familiar with long-standing regulations that are clearly different for set gillnet and drift gillnet fishermen.



5 AAC § 24.331 (b)(3) states “the operation of each gillnet shall be performed or assisted by the fisherman who holds the valid interim-use or entry permit card for that gear.” The definition of performed or assistance is further defined in 5 AAC § 39.107.

5 AAC § 39.107 clearly explains there are different rules for MOBILE fishermen (drifters) and STATIONARY fishermen (set gillnetters). 5 AAC § 39.107 reads:

5 AAC § 39.107. “(d) A person who holds a limited entry permit or an interim-use permit for stationary fishing gear must be physically present at a beach or riparian fishing site during the operation of net gear or other stationary fishing gear at the site, except when the permit holder is at or traveling to or from the location of (1) a sale of fish caught in the gear; or (2) other stationary gear of the permit holder. For purposes of this subsection "fishing site" includes any structure used for providing shelter in support of the operation of net gear or other stationary gear.

(e) A person who holds a CFEC permit for the operation of stationary net gear or fish wheels shall be within a reasonable distance of the gear when at a point of sale or at the location of other stationary gear of that permit holder. A "reasonable distance" means a distance that ensures that the CFEC permit holder retains competent supervision of the gear.” [Emphasis add].

Proposal 45. OPPOSE.

Proposal 45 requests the Board to limit the number of set gillnet sites deployed at any one time to a maximum of four sites. This proposal is unsafe. It does not take into account (1) weather uncertainty; (2) rapid changes in ADF&G fish opener announcements; (3) fish movements, and (4) does not recognize the considerable work required to setup and take out a set gillnet site. I oppose Proposal 45.

Set gillnet fishermen must set anchors and running lines prior to an opener. This work is hazardous involving deployment of heavy anchors and lines, and is most safely completed in good weather conditions, during certain tides, and when strong currents are not present.

Weather conditions can rapidly change, making some unprotected sites too dangerous to fish at the time of the opener. Set gillnet fisherman need to have the flexibility to set a sufficient number of sites during safe weather conditions, and have the flexibility to move to safer sites if weather becomes hazardous.

Additionally, Fish and Game announcements often provide little warning of area closures, requiring set gillnet sites to be setup in a variety of locations to provide fishermen flexibility to rapidly adjust fishing plans after the 2pm announcement. Limiting set gillnet sites to a maximum of four would be unreasonable.

Furthermore, Proposal 45 directly conflicts with all other set gillnet regulations. There is no other set net district in the State of Alaska, that I am aware of, that limits the number of set gillnet sets allowed. Proposal 45 requests the Board to take an unprecedented action that would not only adversely affect PWS set net operations, but could adversely impact other set net operations state wide (if this unfavorable precedent was established).

Furthermore, the proposer does not address the very serious and costly problem that is routinely occurring, where drift gillnet fishermen cut set net anchors and running lines, causing thousands of dollars of gear damage each year. This is the real issue that needs Board of Fish attention, not further limitations



on set net fishermen operations.

Proposal 46. OPPOSE.

Proposal 46 requests the Board to change the Main Bay Subdistrict closure line. Proposal 46 would adversely affect over 500 drift gillnet and set gillnet fisherman by reducing total fishing area when ADF&G limits fishing to the Main Bay Subdistrict only.

The same issues raised in Proposal 46 (about the location and history of Main Bay Subdistrict closure line) were thoroughly and professionally researched by the Alaska Department of Fish and Game (ADF&G), Alaska Department of Natural Resources (ADNR), and enforcement staff as part of a shore fishery leasing matter decided by the State of Alaska on March 18, 2016. Proposal 46 appears to be an attempt to re-adjudicate a matter already decided by the State of Alaska in 2015-2016.

It may be useful for the Board to obtain more information on the State of Alaska's decision on this matter in March 18, 2016 from Andrew Miller, Natural Resource Specialist, Alaska Department of Natural Resources (ADNR), Division of Mining, Land, and Water, Shore Fishery Leasing Program, 550 W 7th Ave Ste 900c, Anchorage, AK 99501-3577, Ph: (907) 269-8545.

We understand ADF&G will provide the Board with the Main Bay Subdistrict closure line history. That history will show the same information already adjudicated in 2015-2016, where the State of Alaska's review found the Main Bay Subdistrict Line has been in the same place for several decades, and not at the "rockpile" location described in Proposal 46.

Proposal 49. RECOMMEND BOARD CONSIDER ALTERNATIVE DESCRIBED BELOW.

Main Bay sockeyes and Wild Coghill Sockeyes are currently being intercepted in the south west district by the seine fleet. This sockeye interception problem has been raised to ADF&G attention on several occasions, yet, the problem persists. Fish tickets in the south west district clearly account for this problem. I request the Board of Fish address a solution that will resolve the Main Bay sockeye and Wild Coghill Sockeye interception and implement a solution in accordance with the existing PWS Management and Allocation Plan.

Thank you for the opportunity to comment

Eric Harvey
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Eagle River, Alaska 99577

Susan Harvey
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Eagle River, Alaska 99577

Max Harvey
PO Box 771026
Eagle River, Alaska 99577



Tatitlek Village IRA Council

"God's Country, USA"



MARCH. 13 2017

This so called ~~starting~~ HERRING
FISHING IN PRINCE WILLIAM SOUND
NEEDS TO BE ADDRESSED THIS YEAR
ENCLOSED IS DIFFERENT REPORTS.
LET US KNOW IF ANYTHING WILL HAPPEN THIS SPRING

David Tlemoff
TATITLEK IRA VILLAGE PRESIDENT

Rick Koyuk
Tatitlek Environmental Director

**REGULATION PROPOSAL FORM for the
ALASKA BOARD OF FISHERIES 2017-2018 MEETING CYCLE
P.O. BOX 115526, JUNEAU, ALASKA 99811-5526**



PC84
2 of 7

Proposals for this cycle are due April 11, 2017

**Indicates a required field*

BOARD OF FISHERIES REGULATIONS

- ☒ Subsistence ☐ Personal Use
☐ Sport ☐ Commercial



***Which meeting would you like to submit your proposal to?**

- ☒ Prince William Sound Finfish ☐ Southeast & Yakutat Finfish & Shellfish
☐ Statewide Dungeness Crab, Shrimp, and Other Miscellaneous Shellfish (Except Southeast & Yakutat)

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.

1. Alaska Administrative Code Number 5 AAC _____

***2. What is the issue you would like the board to address and why?**

HERRING STOCK IN PWS DEPLETION

***3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

- 1 STOP SUBSISTENCE HERRING FISHING FOR SOME YEARS
2 CHANGE LENGTH OF GEAR TO 60 FEET.
3 MONITOR HOW MANY PERMITS AND AREA FISHED

***Submitted By:** DAVID TOTEMOFF TATITLIKIRA VILLAGE PRESIDENT
Individual or Organization

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