



Subject: Re: Winter
From: dtotemoff@rocketmail.com (dtotemoff@rocketmail.com)
To: info@auklet.com;
Date: Monday, March 13, 2017 7:43 AM

Hope your trip will find some and as for trying to stop the spring herring fishing seems like the two departments are not being helpful but will sure keep trying the villages will support if we get the help from Fish and Game and Subsistence group.David

On Mar 12, 2017 8:56 PM, David Janka <info@auklet.com> wrote:

Thanks David.

I have not been out much but the one trip in early January was very quiet.

I will be heading to Valdez at the end of the week and am set up with the Science Center to take a couple of days to look around for any activity on the way over.

Then after 6 days in Valdez will take another look around on the way back to Cordova.

Science Center will be doing their acoustic survey with the ADFG boat Solstice this year. I think they will be out for about a week starting on the 27th/28th of March.

I may have a 5 day trip with them early to mid April.

Heard a report of herring and whale activity at Montague Island. Could be fish heading north.

Did you make any progress with getting ADFG to cancel any subsistence fishing on the herring? Would really hate to see that again.

Sounds like the herring biomass last spring was half of the year before. That means only around 9 metric tons. Very sad to hear.

Outside of all that I hope you are doing well. Cheers, David

On Mar 12, 2017, at 4:56 PM, dtotemoff@rocketmail.com wrote:

Fyi this past winter was the slowest on seeing any herring activity or feeding birds around the area.David

Auklet Charter Services est. 1995
David and Annette Janka
907-253-3428 www.auklet.com

Follow us on Facebook at Auklet Charter Services.

- Never Normalize Trump -

Hope your trip will find some and as for trying to stop the spring herring fishing seems like the two departments are not being helpful but will sure keep trying the villages will support if we get the help from Fish and Game and Subsistence group.David



Subject: Re: Fw: herring

From: dtotemoff@rocketmail.com (dtotemoff@rocketmail.com)

To: katerina_wessels@fws.gov;

Date: Monday, March 13, 2017 8:04 AM



Just wondering how many herring it takes to fill minimum ten five gallon buckets of herring roe and if six or more boats do the same type of so called herring Subsistence and how much will one bucket be worth if sold.thanks David Totemoff Tatitlek IRA Village President.

On Mar 3, 2017 9:45 AM, David Totemoff <dtotemoff@rocketmail.com> wrote:
message from Scott.David

On Friday, March 3, 2017 8:01 AM, Scott Pegau <wspegau@pwssc.org> wrote:

Hi David,

I am not sure how to stop the big gillnetters. I guess you could ask for an emergency closure, but that would hit Tatitlek as well. Maybe the fishery can be closed, but collection of roe on kelp be allowed. Maybe there could be a proposal to limit the length of net, or amount of fish that can be taken. I think the village will need to be the driver of any request to ensure it meets your needs.
Scott

W. Scott Pegau
Research Program Manager
Oil Spill Recovery Institute
Box 705
Cordova, AK 99574
907-424-5800 x222
www.pws-osri.org

From: dtotemoff [mailto:dtotemoff@rocketmail.com]
Sent: Thursday, March 2, 2017 8:26 PM
To: Scott Pegau <wspegau@pwssc.org>
Subject: RE: herring

Thanks for your message and how could we stop the big herring gillnetters that happen each spring.

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Scott Pegau <wspegau@pwssc.org>
Date: 3/2/17 11:23 AM (GMT-09:00)
To: David Totemoff <dtotemoff@rocketmail.com>
Subject: herring

Hi David,

I hope all is going well for you. We are gearing up for our herring work this spring and I want to make sure we stay in touch with someone in Tatitlek. We asked Dave Janka to look in Gravina and Fildago to see if there are any fish around when he heads up to Valdez around the 17th. I suspect



that ADF&G will start flying around then as well. Please keep us in mind if you hear to fish around there.

As you are well aware, last year was the lowest recorded number of miles of spawn and acoustic estimates of biomass. There is a hint that there may have been a disease outbreak a couple years ago that is responsible for the collapse, but those are very early results and they may change as new information becomes available. The biggest issue is that we are trying to use a brand new technique to detect evidence of disease within the previous year and not just identify fish that are currently sick.

I don't know if you guys put anything into fish and game to restrict subsistence herring fishing. It might be worth keeping the fishery closed for a couple years to see if things can turn around some.

Thanks

Scott

W. Scott Pegau
Research Program Manager
Oil Spill Recovery Institute
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Cordova, AK 99574
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www.pws-osri.org

Just wondering how many herring it takes to fill minimum ten five gallon buckets of herring roe and if six or more boats do the same type of so called herring Subsistence and how much will one bucket be worth if sold. thanks David Totemoff Tatitlek IRA Village President.



Subject: RE: Board of Fisheries Proposal form
From: dtotemoff (dtotemoff@rocketmail.com)
To: jeremy.botz@alaska.gov;
Date: Friday, March 3, 2017 2:31 PM

Thank you David Totemoff Tatitlek IRA Village President.

Sent from my Samsung Galaxy smartphone.

Thank you David Totemoff Tatitlek IRA Village President.

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: "Botz, Jeremy C (DFG)" <jeremy.botz@alaska.gov>
Date: 3/3/17 2:09 PM (GMT-09:00)
To: dtotemoff@rocketmail.com
Subject: Board of Fisheries Proposal form

Hi David,

Attached is the proposal form that I mentioned over the phone. The next PWS Board of Fisheries meeting is this coming December in Valdez and the submission deadline for proposals is April 11. Please let me know if I can be of further assistance.

WE CANNOT WAIT TILL NEXT YEAR TO ADDRESS
THIS.

Thanks,

Jeremy

David Totemoff
Tatitlek IRA Village President

----- Original message -----**From:** "Botz, Jeremy C (DFG)" <jeremy.botz@alaska.gov> **Date:** 3/3/17 2:09 PM (GMT-09:00) **To:** dtotemoff@rocketmail.com **Subject:** Board of Fisheries Proposal form

Hi David,

Attached is the proposal form that I mentioned over the phone. The next PWS Board of Fisheries meeting is this coming December in Valdez and the submission deadline for proposals is April 11. Please let me know if I can be of further assistance.

Thanks,

Jeremy



PC84
7 of 7



Submitted By
Thea Thomas
Submitted On
11/8/2017 9:26:34 AM
Affiliation
Area E Commercial Fisherman

Phone
907-424-5266
Email
thea@ctcak.net
Address
PO Box 1566
112 South 2nd St.
Cordova, Alaska 99574

Thank you for taking the time to read and consider my comments. I have been a commercial fisherman in the Copper River/Prince William Sound area for over 30 years. I have also been involved with the Alaska Seafood Marketing Institute for 15 years, have served on the PWSAC board and am presently on the Regional Seafood Development Association board. Today I am submitting these comments on my own behalf.

Through my involvement with ASMI, I have been proud to tell the world about sustainable fisheries in Alaska. Our Responsible Fisheries Management model is based on using in-season science based information. The foundation being **In-season assessments of run strength and monitoring of escapements using the best scientific data and methods available**. This year on the Copper River, we saw ADF&G go against these founding principals. Based on a pre-season forecast for Copper River King salmon we had "unprecedented restrictions" placed on the all the fisheries, before the season had started. As you can imagine this caused an uproar and resulted in many of the proposals you see before you today. Specifically **Proposals 29, 31, 32, 33 and 34**, were submitted before the start of the season. I fully understand that king salmon stocks around the state are a concern, but the Copper River had a strong return of king salmon. I am **opposed** to any changes of the Copper River King Salmon Management Plan or the Copper River District Salmon Management Plan. ADF&G, if they follow the principals of in-season science based management using the best data available, have all the tools they need to manage the fishery.

There are proposals before you wanting to make changes to the Subsistence Management plan in the lower Copper River. I am opposed to any expansion of the subsistence season in the lower Copper River, as suggested in **Proposals 19 and 20**. I rarely hear subsistence fishermen say that they do not have enough opportunity to get their fish.

One area of concern in the Chitina/Glenallen subdistrict fisheries is the expanding commercial enterprise of guiding and chartering Personal Use and Subsistence fisherman. I am not advocating that we limit this activity, but we need to hold these operators to the same criteria of other freshwater guide and charter operators in the state. Many of these operators are "accompanying or physically directing" their clients, which is the definition for the requirement of a guide as outlined in ADF&G regulations. They should be required to have a ADF&G license and maintain log books.

There are several proposals before you, concerning the drift gillnet and set gillnet fisheries in the Crafton Island and Main Bay subdistricts. The problem here is that the setnet fleet in 4 out of the last 5 years, have exceeded their allocation percentage as outlined in the Prince William Sound Allocation Plan. Several years ago the board adopted a regulation to address this issue. The regulation 5 AAC 24.370 (f) restricts openers for set gill nets to no more than 36 hours per week, after July 10th, during the year following the year the allocation was exceeded. The problem is that in recent years the fishing time for both gear types has been greatly reduced in this area. This results in the time reduction for setnetters being meaningless. In 2016, they harvested 10% of the value of enhanced fish, when they are allocated 4%. Another method needs to be adopted to address the setnet over harvest. **Proposal 45** submitted by CDFU to limit the number of set gillnet sites deployed with lines and buoys is the best way to address this problem. This would open up more shoreline to the drift fleet, and hopefully bring the harvest levels back to those outlined in the Allocation Plan.

Proposal 47 addresses the PWS Management and Salmon Enhancement Allocation Plan, you will notice that it is not the Prince William Sound Aquaculture Corporation Allocation Plan. This allocation plan and I quote from the plan in regulation "...is to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine and set gillnet commercial fisheries". When this plan was originally adopted it included all enhanced fish similar to Southeast Alaska's allocation plan. Later, for political reasons, the plan was changed to exclude salmon produced by the Valdez Fisheries Development Assn. with the addition of section (j). This section should be deleted and the plan changed to include all enhanced fish as it was originally intended.

Proposal 49 addresses the continued problem of the interception of fully allocated sockeye salmon in the AFK Terminal Harvest Area. According the PWS Allocation Plan there is to be no seining in the Southwest District prior July 18th. Yet PWSAC began releasing Chum salmon at the AFK Hatchery. The problem is that the seine fleet intercepts sockeye salmon which are bound for the Coghill River or fully allocated to the drift and set gillnet fleets. This needs to be addressed by restricting the harvest to Cost Recovery or restrict the CPF to the Special Harvest Area.

Proposals 38 & 39 propose changes to the seine specifications allowing seine web throughout the entire net including the lead. This change would greatly increase the efficiency of a seine. This only makes sense if you allow permit stacking with second permit onboard,

thus reducing the total number of boats fishing in the fleet.





DATE: November 13, 2017

TO: Board of Fish
State of Alaska

FROM: Thomas J. Aberle
PWS Setnet Permit Holder
429 W 10th St.
Juneau, AK 99801
(907)321-2737

Mr. Chairman and Board of Fish Members:

My name is Tom Aberle and I have been a set gillnet permit holder in Prince William Sound since 1985, for a total of 33 seasons. Thank you for allowing me to comment on a number of Prince William Sound proposals.

Proposal 42: OPPOSE

This proposal is strictly allocative, with the drift fleet trying to increase fishing area that has been allocated to the setnet fleet. In 1983 and 1984, the first two years of the Main Bay Hatchery salmon harvests, the setnet fleet could deploy 100 fathom nets anywhere in Main Bay as per the rest of the Eshamy district. At the 1984 Board of Fish meetings, the setnet fleet gave up being able to fish 100 fathom nets within the Terminal Harvest Area in exchange for 50 fathom sites within the Terminal Harvest Area and 25 fathom setbacks from drift and setnet gear. Outside the Terminal Harvest Area the setnet fleet was allowed to have 100 fathom nets but the distance between setnets in this portion of the new Main Bay Subdistrict had to be 100 fathoms. The drift fleet however could still set within 25 fathoms of our nets in this area. This is the way the regulations continue to read to this day.

For the first 15 to 20 years that I fished there was very little trooper enforcement in May Bay. As a result I often had drifters round-hauling with their 150 fathom nets between my 50 fathom setnets deployed within the Terminal Harvest Area. As a result their nets would be laced together with mine because of fish in their nets, they would get all the fish, I would get virtually none. It was a frustrating situation to say the least.

Today, with much more enforcement present at the openings in Main Bay, things are notably better. The intimidation however does not stop. On every opener I have certain drifters yelling at me how they are going to come in and "scoop up those fish."

The proposal change to a 20 foot fathom setback would be a nightmare for enforcement and a critical loss for the setnet fleet in their ability to harvest fish. The proposal that a 5 to 6 fathom driftboat could operate and work their gear in a 10 fathom slot between our nets is unrealistic and crazy. It only invites more gear conflict and more chance of injury to the setnet fleet operating out of our open skiffs.

Most of the setnet sites within the Terminal Harvest Area are leased under the State of Alaska Shore Fishery Lease Program. This gives us exclusive rights to 50 fathoms of beach, 25 fathoms on each side of our net. This proposed regulation change to a 20 fathom setback would be in direct violation of our State of Alaska shore fishery leases and should not be considered.



Proposal 43: OPPOSED

This proposal, along with proposal 44, seek to limit setnet fishermen to one 50 fathom net during build-up openings in Main Bay. To my knowledge there has never been a ticket written to a drift fisherman for not getting his gear out of the water fast enough when a setnet fisherman wants to deploy a net on the site. This is another strictly allocative proposal. Combined with proposal 44, what certain members of the drift sleet are saying is that only one setnet skiff with the setnet permit holder on board can deploy a net, but then when the setnet holder goes to deploy their second net and finds a drift net draped over their running line (which will be the case on Main Bay build-ups) the drift net permit holder cannot be issued a ticket if they take their time hauling in their gear so that the setnet permit holder can deploy their net. Needless to say, by this time the drift permit holder has already caught any build-up of fish that might have been present at the opening of the period. This proposal increases the chance of gear conflicts and aggression between the two gear groups and presents a nightmare for trooper enforcement.

Furthermore, our shore fishery leases with the State of Alaska give us exclusive rights to those sets on the beach. Let's not forget that the drift fleet has exclusive rights to ALL area offshore of our nets deployed from the beach which is the vast majority of the waters of the Main Bay Subdistrict. It is hard enough sitting on my 50 fathom beach set with a 150 fathom drift net deployed on each side of me just 25 fathoms away.

Proposal 44: OPPOSE

Strictly allocative in nature, this proposal attempts to restrict set gillnet fishermen to one 50 fathom net of Main Bay build-ups. It states set gillnet holders are illegally allowing crewmembers to set nets and work the gear. This statement is FALSE. For set gillnet gear the definition of a fishing site and an explanation of performing or assisting is provided in 5AAC39.107(d). Under current regulations setnet permit holders are considered present as long as they are present at the specific fishing sites, traveling to or from other gear, traveling to deliver fish, or in any structure used for shelter in the support of the operation of set gear or other stationary gear. Setnet crew can set and work gear as long as the permit holder is in the district. This is consistent all across the State of Alaska where set gillnets are legal: Kodiak, Cook Inlet, Bristol Bay, False Pass.

This proposal attempts to limit us to 50 fathoms on the build-up, reducing by 2/3 of our ability to catch fish. It is nothing more than allocative and illegal under 5AAC39.107(d).

Proposal 45: OPPOSE

This proposal attempts to limit a set permit holder to no more than 4 sets with lines and bouys present. This proposal has come up in the last three BOF sessions and has failed in each one due to safety concerns and gear conflicts. In recent years we have been bounced all over different parts of the Eshamy District: Inside Main Bay only, outside Main Bay only, north of a line at Loomis Creek, south of a line at Loomis Creek, south of a line by Foul Bay. In other words, we never know where we are going to be allowed to fish by emergency order as ADF&G tries to conserve wild Coghill stock sockeyes, wild Eshmay stock sockeyes, or get brood stock and cost recovery back to Main Bay. Set gillnetters need to have places to fish set up for many different circumstances.

Sinking running lines and clipping bouys may seem to make sense but in reality adds to conflict. Twenty years ago I used this method on a set I fished down by the north line of the district. An hour before the opening I went and raised the sunken line and clipped on my bouy. There was a drift gillnetter sitting right there and he told me that he had been there for six hours and it was his set. I explained that I had a set gillnet permit which allowed me to set from shore and that I had fished the



site previously but had sunken the site to not be a hindrance to navigation. He became enraged, promised to "F*** with you forever, you will never catch another fish!" When it came time to set my net he continually ran circles in front of me, waking me. He threw coffee cups at me and essentially prevented me from setting my net. I pulled back in what little net I had gotten deployed and ran back to Main Bay with my tail between my legs. The gillnetter later admitted the offense to the troopers when contacted in Cordova after the period.

Other times I have come out to set my nets in the outer district where the lines were sunken only to find nothing there—not a sign, not a running line, none of my bouys, none of the four anchors. Nothing! My cost: \$1500. A set gillnetter never wins those conflicts. We cannot guard our gear 24 hours a day. Most setnetters have stories like these.

Proposal 46: STRONGLY SUPPORT

Re-establish the traditional lines in Main Bay where the marker signs have always been. For the past 31 years there have been signs in the Main Bay Subdistrict marking the Subdistrict lines, the Terminal Harvest lines, the Special Harvest lines and the Alternating Gear Zone lines. Recently many of these signs have been taken down and new lines have been established using GPS. Many of us had sites on those old established lines which are no longer valid. I bought a site on a line from another set gillnet fisherman for \$20,000. I registered it with the Shore Lease Fishery program, now it is no longer a line. The original lines were established 31 years ago after the 1984 BOF meeting when the Main Bay Subdistrict Plan was established. GPS was science fiction at the time the lines were established and signs put up. Now the GPS points are up in the woods far from the shoreline. Hand held GPS devices are all but useless for finding the lines. Unless you have a plotter, which nobody in an open skiff has, you can't find the line. This is happening all over the State of Alaska now and is a real problem. Each district can decide how they want to handle the problem and results are all over the board. I would urge the board to please re-establish the lines where the signs have been for the last 31 years. It is the fairest way for all the fishermen in the Eshamy District, especially the old timers.

Thank you for your consideration of all my comments. I thank and applaud you for all your volunteer time and effort and for the process which you have allowed to continue. Again, thank you so much.

Sincerely,

Tom Aberle

Permit # 60259Z



Submitted By
Tom Baring
Submitted On
11/14/2017 10:50:37 PM
Affiliation

I support the following proposal:

PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit using a dip net from a boat to harvest salmon in the Glennallen Subdistrict, as follows:(b)(5) It is unlawful to harvest salmon using a dip net from a boat in the Glennallen Subdistrict.

Dipnetters fishing from boats dramatically slow the fishing for dipnetters operating upstream (or even shut it down completely). There are of course many variables which affect the fishing, However, for the past 5 or so years since fishing from boats became popular in the Copper River Canyon I've experienced this effect multiple times. When dipnetters on shore succeed it is not at the expense of those further up river. Conflicts over holes generally don't occur because everyone knows it's "first come first served." But a boat can pull up below your hole at anytime and when this happens, you know the fishing is about to get much worse.



Submitted By
Toni Godes
Submitted On
11/17/2017 3:43:34 PM
Affiliation
F/V Qumalat

Proposal 10: Oppose

Regarding Proposal 10 to "set an OEG of 700,000-1.2 million for Copper River Sockeye matching late run Kenai sockeye OEG": First I need to ask why it would make sense to apply a number developed from another fishery for an unrelated and dissimilar fishery. From the beginning the logic of this proposal is flawed. Furthermore, the SEG number has been working on the Copper, and the numbers often exceed this range. And, as CDFU points out, "the lowest threshold of the proposed number would be higher than the current upper escapement goal."

Proposal 13: Support

I support the proposal to "prohibit using a dip net from a boat to harvest salmon in the Glennallen subdistrict." I'd really hate to see the Copper become a zoo like the Kenai; perhaps this is one way to protect the river and prioritize the people who live there and depend on the resource. It is greatly concerning that boats with fish-finding electronics could be so efficient as to be seriously limiting the ability of kings to make it to their spawning grounds.

Proposal 14: Oppose

This proposal is well intended, in the spirit of chinook conservation, but until we have the tools in place to better estimate king returns, I oppose managing the fishery based on chinook forecasts. I am hoping the new Miles Lake Tyson sonar will enable us to do just that in the near future. Season 2017 is a good example of how managing based on a chinook forecast and not in-season information proved problematic.

Proposal 15: Support

The Wrangell St. Elias NPC makes an excellent point about monofilament line and the unintended harm to Chinook that are to be released.

Proposal 17: Oppose

I oppose doubling the area that dipnetters are allowed to fish. Opening more of the river to more boats with fish-finding capabilities is not the way promote Chinook conservation. Furthermore, this shallow and braided section will make it easier to target kings. Allowing for more boats on the river also means more human impact: garbage, fuel, break downs and rescue missions. The Copper River has a reputation of being pristine, but this kind of inevitable environmental impact and increased river pressure only lessens the health of the whole system.

Proposal 18: Oppose

I can understand upriver concerns here, in that the way this is written the red abundance in certain scenarios could be good, and yet the dipnetters would be held to a maximum of 50,000 fish. However, I don't want to see dipnetters catching kings and reds when the commercial fleet is closed down for weeks at a time. We would all need to share the burden in these situations.

Proposal 19: Oppose

I sympathize with Cordova subsistence users. Access has always been difficult, and it is only getting more difficult with inside closures. However, this proposal is unrealistic on a number of points. First off, why would subsistence be allowed when closures (perhaps extended closures) of the commercial fleet could be indicating a need to conserve the resource? Perhaps his proposal would make more sense if it was started later in the season, after enough kings had passed above Miles Lake sonar to satisfy user groups, on a year of low Chinook abundance. If subsistence was open in Cordova May 1st and not upriver, there would be disgruntled subsistence users upriver. Additionally, a May 1st opening for subsistence would engage the portion of the gillnet fleet that is eligible for subsistence (and those they take out on boat), increasing the pressure on the early run. It doesn't help that catch reports are delayed, due to the current report requirements, therefore lessening its potential to be a management tool.

Proposal 21: Oppose

Proposal 22: Oppose

Proposal 23: Support

Catch and release of finfish in fresh water is detrimental to the fish and, therefore, the population.



Proposal 27: Oppose

Proposal 29: Oppose

The language in this proposal was inflammatory, uninformed, and false (refer to CDFU's statement on misinformation). Not fishing inside has greatly minimized king catch, as have the on-average 12 hr/twice a week periods—24 hours of 168, more than enough time for fish to travel up beyond the reach of the gillnet fleet. In addition, many years, fish travel deep and few are caught in deep waters or on the "rips" in front of bars. We have experienced quite a few years of this phenomenon, at least the last three, that I can recall. Some attribute this to fish swimming deeper to avoid the warm waters on the top of water column. And there are the bigger unknowns of what is happening in the ocean for all king runs in the state. Moving the gillnet fleet a quarter mile off the beach would make it very hard to make a living, as eliminating the inside has taken a great toll on the small boats in the fleet.

Proposal 31: Oppose

Reducing the net to 12 feet is ridiculous in an ocean fishery, especially when shallow inside waters have already been eliminated. Unlike the Fairbanks sport fishermen, Copper River gillnetters are actually trying to make a living and are heavily invested. The cost of another net and the reduced returns (I would wager returns could be easily cut in half or more) for the same amount of fuel/overhead would cause serious distress in the fishery. Over escapement also becomes an issue in this scenario.

Proposal 32: Oppose

All of the Fairbanks Fish and Game Advisory Board proposals are so poorly argued that it is not worth my time to argue each of their "alternative facts." I advise them to have someone fact check their ad hoc proposals before they submit them—and lose the sensational, non-professional language.

Not fishing in May if the forecast is less than 35,000 or less than the 20-year average is an argument with many pitfalls.

Proposal 33: Oppose

Oh my. Another doosie. And why would I donate my fish to the wealthy Fairbanks sport fishermen who have a minimal financial investment in the fishery and do not live on the river?? The Yukon is not comparable to the Copper any more than the Kenai is; this is a faulty analogy.

Proposal 34: Oppose

I have nothing to add to CDFU remarks. 2013 is an excellent example of why this kind of mandatory policy doesn't make sense.

Proposal 37: Support

I support this proposal in the interest of spreading the fleet out. Furthermore, king runs are probably less impacted here. This proposal is worth considering if fish interception is concluded as minimal.



Proposal 40: Oppose

Proposal 41: Support

Submitted By

Toni Godes

Submitted On

11/17/2017 8:01:20 AM

Affiliation

F/V Qumalat

Phone

9074298664

Email

tonigodes@gmail.com

Address

PO Box 943

Cordova, Alaska 99574

Regarding CDFU Proposal 16 requiring log books from sport guides, all efforts to get a better understanding of what fish are being caught in-river, and where, is necessary and good for long-term management efforts. Records of fish caught at the mouth of the river are well-understood; records upriver are missing or questionable and unenforced. I support CDFU Proposal 16.



11/17/2017

Dear Board of Fisheries members,

Allow a short introduction: I am a resident of Cordova, commercial drift gillnetter, subsistence and sport user, and mother of two young boys that cares about Alaska, its resources and our future. Thank you for the opportunity to comment on the proposals found in the 2017 PWS finfish booklet. Your work and time is greatly appreciated.

Proposal 10 – OPPOSE

I'd reference the department's comments that since the Copper River sockeye SEG was established, the goal has been met in 36 out of 37 years. It has been efficient at meeting demands of many users. It is not good practice to set an OEG simply based off another watershed's goal. As you look at the parent year escapements of our 2016 and 2017 returns, I agree with the department that this increase would likely result in reduced yields and salmon productivity.

Proposal 16 – SUPPORT

As commercial operators on the delta, we are responsible to provide immediate harvest data to managers to assist in their in-season and post season management strategies. As a business operator, your responsibility is higher to assist managers with real time data. Harvest and area where harvested is a management tool. While the department does not want duplicate information, turning the responsibility over to charter operators to report harvests on a weekly basis would give more information. This is something managers might certainly need for better king enumeration and possible with better technology.

Proposal 17 – OPPOSE

The current area accommodates the allocation demands from the PU fishery. Doubling their area size is not necessary for harvest needs and would have negative implications on the Native Village of Eyak's mark-recapture chinook project. This is the primary tool, beside commercial harvest, that managers have to enumerate chinook salmon.

Proposal 18 – OPPOSE

Each year, the author of this proposal asks for mandatory time and area closures for the Copper River commercial fishery, regardless of in-season data of run strengths. This regulation was put into place to ensure the burden of conservation is shared amongst users and we are all in this together. By eliminating it, without similar consideration for the commercial users mandatory closures would not be appropriate. This is a justified tool for a fishery that is opened until closed, unlike the commercial fishery that is closed until opened. I'd refer to the department's comments, "There is no inseason monitoring of harvest and thus no mechanism to adjust the fishing time based on actual harvest."

Proposal 28 – SUPPORT



The department has been much more conservative when this regulation stipulates since I've been fishing. Inside closures are a tool they use annually because of their uncertainty in chinook data. If chinook and sockeye run strengths warrant inside openers, I would hope the department could liberalize opportunity on the inside.

Each year, the fish return differently. Some years the sockeye hug the beaches and mill inside the islands, instead of out in the ocean. This missed opportunity can be seen from recent high escapement years and now we are seeing the protégé returns from those high escapement years. I'd refer to the department's comments in Proposal 10 on productivity of higher escapement.

Proposal 29 & 31 & 32 – OPPOSE

These proposals state that chinook salmon are a stock of concern. This is inaccurate; as is the statements that opportunity for king salmon was eliminated. I'm sensitive to their concerns though. After the preseason forecast was announced in early spring, managers severely restricted chinook allowances for subsistence, sport, and PU fisheries, as these fisheries become opened until closed. Commercial managers did not announce closures or restrictions at this same time, primarily as we are closed until opened. Politically, this was not the best strategies as we commercial users were reduced greatly by time and area once May rolled around. By April, these proposals and an emergency petition to the BOF were written to ensure commercial users share in the burden. We did.

Chinook data is quite low on the Copper River and managers have limited resources for in-season data. Even with these restrictions, they were able to use commercial harvest data and NVE fish wheels to make in-season decisions to liberalize the subsistence and PU fisheries. There are questions whether pre-season forecasting is necessary with technology and speed in which managers can react to in-season run strength.

Regarding these specific proposals, the department has EO authority to manage in-season for abundance and run strengths. None of these mandatory restrictions are necessary.

Proposal 34 – OPPOSE

Refer to departments comments on managing for escapement and timing of Miles Lake as an efficient tool.

Proposal 40 – OPPOSE

This proposal would reallocate sockeye in the Main Bay district from gillnet to setnet users. This is not necessary as the setnet users have met and exceeded their share according to the PWS Allocation Plan. As the department comments state, "Nearshore fishing opportunity would be reduced for the drift gillnet fleet in the Crafton Island Subdistrict" as fish generally run the shoreline.

The PWS Allocation Plan's trigger for when the set net users are above their percentage is ineffective, as the peak of the run is July 4th. Also, while the gillnet and seine fleets offer the other group relief in cost recovery burdens through the PWSAC cost recovery process, the set net fleet has benefited without



contributing to the cost recovery burden. PWSAC focuses on taking gillnet cost recovery from Esther chums, simply for efficiency in the process, therefore the set net fleet most often doesn't share in paying for Main Bay operations. There are no efficient ways to balance.

Reallocating more fish to the set net users will not help balance their percentage.

Proposal 42 – SUPPORT

This proposal gives some drifting room to the drift gillnet fleet that must squeeze between two set net operations that require operations be 50 fathoms apart. Set net operators get frustrated as drift operators work to maintain their 25 fathom distance. This proposal would alleviate confrontations and frustrations on both sides, as well as enforcement stress of responding to numerous calls from the set net fleet.

Proposal 43 - SUPPORT

Main Bay sockeye, unlike our Coghill chums, have a reputation of heading straight to Main Bay and mill in the shallows by the head of the hatchery. There is a large buildup of sockeye to harvest at the start of each opener and nets are very close together. I wasn't around at its inception when the board made it regulation to maintain a 25 fathom distance but some remember that this regulation wasn't to move out gillnet opportunity and access to cleanups in Main Bay. This is what has been slowly happening as enforcement is forced to interpret the regulation.

Proposal 44 – SUPPORT

This proposal clarifies that the permit holder must be onboard. That means the permit holder's crew can't deploy two or three sites at once and give clean up access to all users.

Proposal 45 – SUPPORT

This proposal would clean up the shoreline and provide additional area for drift gillnet fishermen to operate. Often, sites are deployed for the season, even if not used for that fishing period or week. Two years ago, I fished along a beach that had deployed lines, anchors, and bouys but the operator did not ever set his net here the whole season. I've also drifted onto lines set for a site that wasn't being used and found it had hooks sewn onto the line. It was very dangerous to retrieve my net and so moved locations. If the site isn't to be used that period, it would be best to pull anchors and move lines for others to fish there.

Proposal 47 - AMENDMENT

I don't know whether to oppose or support this proposal because much work is needed on everyone's part. Our goal is to equitably share in the value of our fisheries between users. I believe it is time to review our existing allocation plan but need a plan. It won't happen at this BOF cycle meeting. That's wishful thinking and requires much work.



I propose the BOF organize a workgroup of shareholders to spend a year to review the PWS Allocation Plan, hear each gear group's concerns, and make recommendations to the BOF in one year at an out of cycle meeting, perhaps Spring 2019.

These concerns may include Mr. Bowen's request to look at adding VFDA value. Also, I would like to discuss the 47% trigger that says seiners must give Port Chalmers chum return to the gillnet fleet when below 47% or gillnetters must give Esther chum return to the seine fleet when below 47%. Port Chalmers and Esther are not equitable triggers. In fact, production at Port Chalmers is so low that it has been a net loss to the gear group that fished it three out of the last five years. The PWSAC board is having discussions on how to get out of the Port Chalmers remote release program. This production change would require a change to the Allocation Plan.

I believe this workgroup must be BOF driven because the PWSAC board must focus on operations and can't afford allocation battles in the board room. With that said, I feel PWSAC and CDFU have a responsibility to help facilitate these meetings and structure.

Thank you for the opportunity to comment on these proposals. This process is so important to our state and our fishery's future. I will not be in attendance in Valdez, as we are welcoming a new baby pretty quick.

Wishing everyone a good, productive meeting.

Best,

Tracey Nuzzi



Submitted By
Travis Williamson
Submitted On
11/17/2017 10:20:42 PM
Affiliation
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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



Submitted By
wade buscher
Submitted On
11/17/2017 3:05:48 PM
Affiliation

My name is Wade Buscher and I'm an Area E gillnet fisherman and live in Cordova. I agree and support all the comments submitted by CDFU. I've made some comments regarding those issues that are most pertinent to me as a commercial salmon fisherman.

Thank you

PROPOSAL 10

5 AAC 24.360. Copper River District Salmon Management Plan.

Set an optimal escapement goal for Copper River sockeye salmon, as follows:

Set an OEG of 700,000-1,200,000 for Copper River Sockeye matching the late run Kenai Sockeye OEG. The Copper River is a much longer drainage with more spawning and rearing habitat than the Kenai. The current SEG of 360,000-750,000 is artificially low but is cited by the commercial fish managers as the primary justification for continuing to exploit King Salmon. Over escapement of sockeye has never been a true biological concern on the Copper River and should not be cited as an excuse to harvest Kings.

What is the issue you would like the board to address and why? Having no OEG for Sockeye causes managers to exploit Kings under the excuse of trying to avoid exceeding the sockeye SEG.

I oppose proposal 10

The suggestion that the ADF&G manages the Copper River Salmon fishery in such a fashion as to "exploit kings under the excuse of trying to avoid exceeding the sockeye SEG" not only oversimplifies the methods and goals of sound fisheries management but also gives little credence to the actions and limitations placed on the commercial fleet in recent years. In the relatively short amount of time that I have been an Area E commercial fisherman (2000-present) I have seen consistently more time/area restrictions in response to lower king returns, and consequently more escapement of sockeye up river. And never in this short amount of time have I ever heard anyone from the ADF&G suggest that we should continue to fish to keep from exceeding the sockeye SEG. Setting an OEG to 700,000-1.2 million along with the already mandatory king closure restrictions would put greater financial hardships on the commercial fleet in the form of more lost opportunity.

I oppose proposal 10

PROPOSAL 13

5 AAC 01.620. Lawful gear and gear specifications.

Prohibit using a dip net from a boat to harvest salmon in the Glennallen Subdistrict, as follows:

(b)(5) It is unlawful to harvest salmon using a dip net from a boat in the Glennallen Subdistrict.

I support proposal 13

If boats continue to be used for 'personal use' harvest of salmon on the Copper River, and it's shown that these boats increase the effectiveness of catching both Sockeye and Chinook salmon compared to dipnets from the beach, and the number of boats on the river continue to increase, then limitations to this type of fishing should be considered.

I support proposal 13

PROPOSAL 14

5 AAC 24.361. Copper River King Salmon Management Plan.

Modify the season dates for the Glennallen Subdistrict subsistence salmon fishery based on the preseason king salmon harvest projection, as follows:

I oppose proposal 14



Conservation of Copper River Chinook should be of highest priority for all user groups. I think it's important that all tools available to maximize and maintain on the 'sustained yield principle.' As much as pre season forecasts might the fishery conservatively, it has been shown that there are better results by using 'in season', 'real time' data to create informed management decisions.

I oppose proposal 14

PROPOSAL 15

5 AAC 01.620. Lawful gear and gear specifications and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit the use of monofilament or gillnet mesh in dip nets, as follows:

Prohibit the use of monofilament or gill net mesh material in dip nets used in the subsistence and personal use fisheries of the Upper Copper River District.

I support proposal 15

PROPOSAL 16

5 AAC 01.xxx. New Section and 5 AAC 77.xxx. New Section.

Require log books for all charters operating in personal use and subsistence fisheries, as follows:

A vessel for hire should keep a logbook recording the number of customers, the methods by which they fished, and the total number of each species caught.

I support proposal 16

Just as the commercial fisheries are closely monitored to collect data that makes for informed management decisions, so to would it be beneficial to collect data from other data sources., ie log books from personal use charter boat operators.

I support proposal 16

PROPOSAL 17

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Extend the lower boundary of the Chitina Subdistrict downstream to the Uranatina River, as follows:

(h) For the purposes of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina- McCarthy Bridge downstream **to an north/south line beginning at the mouth of the Uranatina River and crossing the Copper River as designated by ADF&G regulatory markers.**

I oppose proposal 17

The primary beneficiary of this proposal would most likely be the commercial component of the personal use fishery that can access this area,(ie river transport/guide boats). If most of the personal use fishers are catching their seasonal limit within the current area boundaries then why would there be a reason to extend these boundaries. Giving more access to boat fishers would likely increase Chinook capture rates, and perhaps negatively effect healthy salmon habitat with boat wakes, pollution, etc.

I oppose proposal 17

PROPOSAL 18

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

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, as follows:

(f) The maximum harvest level for the Chitina Subdistrict personal use salmon fishery is 100,000 - 150,000 salmon, not including any salmon in excess of the in-river goal or salmon taken after August 31. [IF THE COPPER RIVER DISTRICT COMMERCIAL SALMON FISHERY IS CLOSED FOR 13 OR MORE CONSECUTIVE DAYS, THE MAXIMUM HARVEST LEVEL IN THE CHITINA SUB DISTRICT IS REDUCED TO 50,000 SALMON]

I oppose proposal 18



PROPOSAL 19

5 AAC 01.610. Fishing seasons.

Allow salmon to be taken for subsistence purposes at any time between May 1 and November 30 in the Copper River District, as follows:

I oppose proposal 19

Opening the Copper River District subsistence fishery for this extended period of time would make it extremely difficult to regulate and enforce. More commercial fishermen would take advantage of these extended dates, use their vessels to transport other subsistence users, and thus put more pressure on the Chinook resource especially in the early part of the season. I certainly support native access to the Copper River subsistence fishery; however, there are probably better alternatives to making this possible.

I oppose proposal 19

PROPOSAL 29

5 AAC 24.350. Closed waters.

Extend inside closure area to 1/4 mile off the southern shores of all barrier islands in the Copper River commercial drift gillnet salmon fishery, as follows:

(1) Extend the inside closure area to 1/4 mile off the southern shores of all barrier islands.

I oppose proposal 29

"Inside closures have proven only mildly effective at reducing incidental King harvest." The restrictions put in place these last few years to reduce king take must certainly be having an effect on the overall harvest of kings by the commercial fishery. It would be difficult to ascertain just how many kings are conserved with the utilization of inside closures, especially when there is coinciding time restrictions but it is common knowledge there would be a much greater king take if fishing were allowed in these areas. Pushing the fleet to 1/4 mile off shore would prove detrimental to the sockeye harvest and would cause tremendous economic hardship for Copper River fishermen.

I oppose proposal 29

PROPOSAL 31

5 AAC 24.331. Gillnet specifications and operations.

Reduce the maximum depth of drift gill nets in the Copper River District commercial drift gillnet salmon fishery to 29 meshes through the start of Statistical Week 24, as follows:

Reduce the maximum depth of gill nets fished through the start of Week 24 (end of May) to 29 meshes.

I oppose proposal 31

Most fishermen on the Copper River do not target King salmon. Financially it makes more sense to catch 100-200 sockeye compared to a handful of kings one might be lucky to catch on any given day. But trying to catch sockeye with a 29 mesh deep net just wouldn't be effective. There would be no incentive to fish if we couldn't cover expenses and most likely the fleet would stay tied up if this restriction was implemented.

I oppose proposal 31

PROPOSAL 32

5 AAC 24.361. Copper River King Salmon Management Plan.

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, as follows:

If the preseason run forecast is below the 20-year average (or 35,000 Kings if a firm number is preferred), no commercial salmon fishing will occur in May (through start of Week 24). Commercial fishing may not open until Week 25 (first week of June).

I oppose proposal 32

The 2017 Copper River season is a perfect example of why the pre season forecast is not a viable method for predicting in-season numbers. With a weak pre season forecast for sockeyes, and an even weaker prediction for kings, ADF&G took a very conservative approach and limited time and area from the onset. And yet with the restrictions there appeared to be an abundance of kings, a much stronger run than the pre season forecast predicted. In the end the king closure restrictions remained in place and the king catch proved to be above everyone's expectations. Had there been a mandatory closure throughout May, there would have been no knowledge of the size of the king run, and only lost opportunity to show for it. Utilizing the commercial fishery as a tool to gauge run size or failure has always been one of ADF&G tools to manage the fishery using real time data. This scenario and how 2017 played out should be reason enough to

not put restrictions on the commercial fishery based on pre season forecasts.

I oppose proposal 32



PROPOSAL 33

5 AAC 24.361. Copper River King Salmon Management Plan.

Prohibit sale of commercially caught king salmon in the Copper River District if restrictions on Copper River drainage subsistence fisheries have been implemented, as follows:

I oppose proposal 33

PROPOSAL 34

5 AAC 24.310. Fishing seasons.

Prohibit commercial salmon fishing in the Copper River District until a salmon is recorded at the Copper River sonar, as follows:

I oppose proposal 34



Submitted By
Wendy W Robbins
Submitted On
11/15/2017 8:10:34 AM
Affiliation

I understand the Board is considering a change in the rules regarding dipnetting on the Chitina River. I am in ***favor*** of Proposals 10, 16, 17, 19, 20, 23, 25, 28. I ***oppose*** Proposals 13, 14, 15, 18, 36.

Thank you.

Wendy Robbins



Submitted By
William Markowitz
Submitted On
11/16/2017 1:19:57 PM
Affiliation

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I don't know if this is where I should be leaving comments for the upcoming board of fish but hopefully this will help convey the feelings of not only myself but others in the fleet: 1) The Cordova gillnet fleet is a small boat fleet 2) The current management practice of restricting commercial harvest of Copper River Sockeye to outside the barrier islands has put the fleet in harm's way causing 1 death, 1 overturned vessel as well as various other injuries 3) As a small boat operator I realize the choice is mine whether or not to fish during gale force winds or times of inclement weather, that being said I also have debts to pay as do many of my fellow fishermen 4) Restricting the fleet to outside the barrier islands has forced us fish in harm's way rather than in the protected and TRADITIONAL FISHING AREAS INSIDE THE BARRIER ISLANDS!! 5) The economic cost to the fleet and to the city of Cordova are staggering due to this restriction of fishing grounds I hope that my comments will be heard and help change the course of management of the Copper River fishery Regards, Bill Markowitz F/V Canvasback



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
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Copper Center, AK 99573

November 14, 2017

John Jensen, Chair
Alaska Board of Fisheries
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526

Subject: Comments on Proposals for December 2017 Prince William Sound Meeting

Dear Mr. Jensen:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 26 and 27, 2017. At this meeting, the SRC reviewed the proposals that will be considered at the December 2017 Prince William Sound meeting of the Alaska Board of Fisheries and would like to provide the following comments:

Proposal 10: Set an optimal escapement goal for Copper River sockeye salmon: The Wrangell-St. Elias SRC opposes Proposal 10. The escapement goal should be based on biological data whenever such data are available. Additionally, the Kenai River is different from the Copper River, and it does not make sense for the Copper River escapement goal to match the goal for the Kenai.

Proposal 13: Prohibit using a dip net from a boat to harvest salmon in the Glennallen Subdistrict: The Wrangell-St. Elias SRC supports Proposal 13 with modification to prohibit dip-netting from a boat in the Glennallen Subdistrict north of the Tonsina River. The commission is concerned about dip-netters targeting king salmon from boats, for example at the mouths of tributaries, when there are conservation concerns about king salmon.

Proposal 14: Modify the season dates for the Glennallen Subdistrict subsistence salmon fishery based on the preseason king salmon harvest projection: The Wrangell-St. Elias SRC supports Proposal 14 for reasons stated in the proposal. The commission submitted this proposal.

Proposal 15: Prohibit the use of monofilament or gillnet mesh in dip nets: The Wrangell-St. Elias SRC supports Proposal 15 for reasons stated in the proposal. The commission submitted this proposal.

Proposal 16: Require log books for all charters operating in personal use and subsistence fisheries: The Wrangell-St. Elias SRC supports Proposal 16. Requiring charter operators to maintain log books would provide information about whether personal use and subsistence fishermen are using a boats for hire.



Proposal 17: Extend the lower boundary of the Chitina Subdistrict downstream to the Uranatina River: The Wrangell-St. Elias SRC opposes Proposal 17. The commission is concerned that expanding the fishing area could result in increased harvest. In years of low returns, this could affect escapement.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Daniel E. Stevens".

Daniel E. Stevens
Chair