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Mr. Chairman and members of the Board of Fish

Written comment on proposal 47,

Proposal 47 is simply a word for word copy of proposal 11 in the 2014 BOF meeting that had the same author. Proposal 11 failed by a vote of 0 to 7.

The Prince William Sound Enhanced Salmon Allocation Plan took several board cycles, countless hours of committee meetings before being adopted. The decision to restrict the Enhanced salmon to PWSAC production was discussed for years and finally adopted by the BOF as it is written today.

The bases for the allocation plan is fairly simple, PWSAC was created by both the purse seine fleet and drift gill net fleet participants, the goal was to increase fishing opportunity and revenue for both gear groups, set net fishermen were included soon after. Almost from the start the question of which gear groups would be able to catch PWSAC produced salmon became a contentious issue. BOF proposals became the norm starting in the very early 1980s, it was clear to everyone, a written allocation plan was necessary. In December of 2005 the BOF amended the PWS allocation plan to exclude all wild stocks and Valdez Fishery Development Association from the " Prince William Sound Enhanced Salmon Plan"

The rationale for this are many, first the fishermen whom make up PWSAC share only one fishing district with each other. The only place where drift gill net gear and purse seine gear can operate at the same time is in the Coghill District. ( upper Unakwik is shared but typically has 1 to 5 deliveries per year) In short wild pinks and chums in all districts except Coghill are harvested by the purse seine fleet. The same applies to wild sockeye in Coghill, wild sockeye, Kings and coho harvested in the Copper River Flats and Bering River districts.

The basis for allocating only PWSAC produced salmon is the long term harvest value for salmon in PWS prior to hatcheries was approx 50-50 between the purse seine fleet and the drift gillnet fleet. The intent is if PWSAC salmon value are allocated in the same manner as prior to PWSAC then PWSAC production value will not upset the historic balance.

I requested the total value of salmon both wild and enhanced harvested in PWS since hatchery production started in the early 1980s, Comm fish harvest records by value are available from 1984 thru 2016. The results are, for all species, the total value of purse seine harvested salmon is \$ 852,676,673. For the drift gillnet fleet 1984 thru 2016 the total value of all species of salmon harvested is \$978,079,480. So if the worry is both gear groups should be harvesting by value the historic approx 50-50

split the drift gill net fleet is \$125,402,807 dollars ahead of the purse seine fleet. Hardly a reason to alter the existing allocation plan to give more harvest value to the drift fleet.

There should be a compelling reason to change an existing allocation plan better than I want more fish. In proposal 47 there is reference to VFDA having borrowed funds from the state of Alaska to build and expand the Valdez hatchery. The claim is, VFDA is using **public funds**, sounds like free money, well it is not. I called VFDA and asked if they were getting free money, no was the reply, they borrow and make payments just like I did when I borrowed money from the state. That is not "public funds" it is a loan, you borrow it, pay interest, loan fees and pay it back. Borrowing money from the state is common, purse seiners do it, drift gill netters do it long line fishermen and crabbers and hatcheries all borrow money from the State of Alaska loan program. The author of proposal 47 states "Why is the PWS seine fleet allowed exclusive benefit to VFDAs **publicly financed** enhanced salmon production". The message seems to be if you get a loan from the state, other gear groups and members of the public are entitled to some of the harvest/production. A slippery road to say the least.

The Prince William Sound Enhanced Salmon Allocation Plan is working, it is accomplishing exactly what it is intended to do, share the harvest value of of PWSAC produced salmon.