

# On-Time Public Comments List

Alaska Board of Fisheries Southeast & Yakutat Shellfish & Finfish | Sitka, January 11-23, 2018

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Submitted By  
Aaron Woodrow  
Submitted On  
11/28/2017 11:08:25 AM  
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Juneau, Alaska 99801

Aaron Woodrow, Proposal 76, personal use/sport shrimp pot minimum mesh size restriction

I am the author of proposal 76 for establishing a minimum mesh size for shrimp pots in Southeast Alaska. The proposal was supposed to include language to cover personal use shrimp pots as well as sport shrimp pots. The proposal should include the term " and personal use" in conjunction with the term "sport" any where it is used. It should be noted that all commercial shrimp pots already have a minimum mesh size regulation in place.

The proposal should read as follows with the amendment highlighted in capital letters:

#### **PROPOSAL 76**

##### **5 AAC 47.035. Methods, means and general provisions – Shellfish.**

Establish mesh size requirements for Southeast Alaska sport AND PERSONAL USE shrimp pots, as follows:

I recommend the board impose a minimum mesh size for sport AND PERSONAL USE shrimp pots in Southeast Alaska, both netted and rigid, equal to the sport fish regulations already in place describing legal gear of shrimp pots in southcentral Alaska as follows. This is a direct copy and paste from southcentral sportfish shellfish regulations. Under this regulation, rigid sport shrimp pots must have a mesh opening of 7/8 inch square inside measurement.

#### **Shrimp pot requirement:**

- Two vertical sides of all shrimp pots must be made entirely of webbing big enough to allow a 7/8-inch round wooden dowel to go through without stretching or otherwise deforming the opening.
- The two vertical sides must touch each other and cannot be covered by anything.
- The other two sides, top, bottom, and tunnels may be composed of any material.
- The 7/8-inch size allows undersize and juvenile shrimp to escape.

A shrimp pot with no definable sides, such as a round pot, must have 50% of its vertical surface area covered with 7/8-inch webbing. The other 50% of its vertical sides, as well as its top and bottom, may be composed of any material.

**What is the issue you would like the board to address and why?** There are no restrictions in place regarding mesh size of shrimp pots for sport AND PERSONAL USE fishing in southeast Alaska to allow juvenile shrimp to escape.

Due to a trend in declining shrimp stocks and closures of several areas in southeast Alaska to sport AND PERSONAL USE and commercial use, it would seem to be a logical and responsible action to impose a minimum mesh size on sport AND PERSONAL USE shrimp pots to allow the escapement of juvenile shrimp. With no mesh restrictions in place, extremely young shrimp are harvested without a method for them to escape, facilitating the decline of this resource.



Submitted By  
Adam Hackett  
Submitted On  
12/28/2017 1:19:17 PM  
Affiliation  
Hackett, Adam

In an effort to maintain access to salmon by trollers, especially in these times of low king salmon abundance, I urge Board of Fish to approve the following Proposals:

146,173,174,177,180,183

In regards to Unuk River and Chilkat and King Salmon River King Salmon action plans; An effort towards conservation by all user groups is essential to real conservation. In order to allow for intended conservation efforts decisions must be based on good scientific data with cooperation and collaboration from all user groups.

Thank you for your efforts and for considering my comments

Adam Hackett

Submitted By  
Adam Hackett  
Submitted On  
12/28/2017 2:37:32 PM  
Affiliation  
Hackett, Adam

As a concerned citizen and sport, subsistence and commercial user, I would like to see the amount of Herring harvested in Sitka Sound Sac Roe fishery decreased as a preventative measure. We have seen Subsistence harvesters displaced from this resource. We have also seen Halibut and Salmon stocks suffering, further undermining their survival potential by overharvesting the base of our ecosystem is irresponsible and unethical. Especially with current market conditions for Herring sac roe, this equates to wanton waste in my mind, with many many people, species and generations adversely affected.

I strongly support the amended version of Proposal 99 while opposing proposal 104 and 94 to encourage both conservation and responsible use of this resource.

thanks for considering my comments

Adam Hackett



# MEMORANDUM

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

Boards Support Section

TO: Alaska Board of Fisheries      DATE: October 25, 2017

THRU:

PHONE: 907-465-6095

FROM: Glenn Haight, Executive Director *GH*      SUBJECT: File Material related to  
Alaska Board of Fisheries      Darrell Kapp request in EF-  
F17-067

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During the Board of Fisheries (board) discussion of Darrell Kapp's non-regulatory proposal, EF-F17-067, at the board's October work session, I offered to assemble related correspondence between the board and the Commercial Fisheries Entry Commission (CFEC) which occurred following the 2015 Southeast Finfish meeting.

Accompanying this memo you will find three letters including -

- March 3, 2015 Chairman Tom Kluberton to CFEC Commissioner Bruce Twomley,
- May 13, 2015 Commissioner Twomley letter to Chair Kluberton, and
- January 8, 2016 Commissioner Twomley letter to Chair Kluberton. This letter included a significant amount of public comment which is summarized in the letter.

For context, Darrell Kapp submitted Proposal 126 in April 2014 which was taken up and tabled at the 2015 Southeast Finfish meeting. It was determined at the time that the board lacked authority to meet the request of Mr. Kapp absent action that was within the authority of CFEC.

This compelled Chairman's Kluberton's letter of March 3, and the ensuing regulatory project conducted by CFEC and summarized in Commissioner Twomley's January 8, 2016 letter. The board took up the tabled Proposal 126 at its Statewide Finfish meeting in March 2016, where it voted 6-0 to take no action based on a lack of regulatory authority.



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of



PC003  
2 of 8

ALASKA BOARD OF FISHERIES

1255 West 8th Street  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Main: 907.465.4110  
Fax: 907.465.6094

March 3, 2015

Bruce Twomley  
Chairman, Alaska Commercial Fisheries Entry Commission  
P.O. Box 110302,  
Juneau, AK 99811-0302

Subject: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Chairman Twomley:

During the 2015 Southeast and Yakutat Finfish meeting in Sitka this past week, the Board of Fisheries considered Proposal 126, which would allow Sitka Sound herring seine permit holders to utilize open pounds to harvest roe on kelp in lieu of their customary sac-roe herring seine gear.

You may be aware the Sitka Sound herring fishery value has declined somewhat over the past few years with the market price falling below \$200/ton.

Also, the Sitka Tribe has encouraged the Board to reduce open fishing area and diminish harvest levels.

In considering Proposal 126, the Board was intrigued that the open pound fishery might provide a potentially higher price-point product to the market.

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the Southern Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open pound gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear for seine permits.

The Board was offered a variety of options by the Department of Law for action on Proposal 126 in light of the inability of the Board to pass the proposal as written, including passing the proposal contingent on eventual approval by CFEC. Not knowing whether or when CFEC might act, the Board found it difficult to craft appropriate language. The Board decided it was more appropriate for the proposer to approach CFEC for approval of this concept before the Board would take subsequent action and allow current seine permit holders the option of utilizing open pound alternative gear.



Accordingly, I am writing to inform you that the Board is open to further consideration of the proposal, and encourages the CFEC to assess the feasibility of acting to allow this fishery when approached by the proposer, Mr. Ryan Kapp.

You may already be aware of this concept as it has been before both the Board of Fisheries and CFEC over the years. We understand that CFEC may need a fair amount of time to make its determination.

Best Regards,

A handwritten signature in black ink, appearing to read "Tom Kluberton", followed by a horizontal line.

Tom Kluberton, Chairman  
Alaska Board of Fisheries

Attached: Proposal 126

CC: The Honorable Sam Cotten, Commissioner ADF&G





THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

8800 Glacier Highway, Suite 109  
PO Box 110302  
Juneau, Alaska 99811-0302  
Main: 907.789.6160  
Licensing: 907.789.6150  
Fax: 907.789.6170

May 13, 2015

Tom Kluberton, Chairman  
Alaska Board of Fisheries  
P.O Box 115526  
Juneau, AK 99811-5526

Re: Board of Fisheries Action on Southeast and Yakutat Finfish  
Meeting Proposal 126

Dear Chairman Kluberton:

I am sorry for the time that this response to your March 3, 2015 letter has taken. CFEC and I have had much more than the usual interruptions during the intervening period.

You called our attention to Board Proposal 126, which appears to be intended to authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery.

An issue arising from the proposal is that CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted.

Your letter suggested the following approach:

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

\* \* \*



A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the [Northern] Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear of seine permits.

I dithered over this a little bit, because I am accustomed to the Board first making a methods and means decision conditioned on subsequent independent regulatory action by the commission. However, there is at least a *prima facie* case for CFEC making a regulatory proposal that would modify its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area within Board's definition of the Sitka Sound roe herring purse seine fishery. Because our administrative area definition includes another limited fishery subject to Board regulation, there is an argument that we have not fully met our statutory duties under the Limited Entry Act AS 16.43.200, which reads in relevant parts as follow:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

\* \* \*

The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

We will develop and publish a regulatory proposal for public comment. Of course, we will have to reserve judgment, until we have heard all the public testimony, as to whether the proposal is or is not consistent with the purposes of the Limited Entry Act. I can think of



competing analyses, and I am not sure about where this proposal will end up. But we can ensure that all sides are heard and fairly considered.

By Direction of the  
COMMERCIAL FISHERIES ENTRY COMMISSION

A handwritten signature in black ink, appearing to be "Benjamin Brown", written over a horizontal line.

Benjamin Brown, Commissioner  
Bruce Twomley, Chairman

cc: The Honorable Sam Cotten  
Commissioner, ADF&G



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

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January 8, 2016

Tom Kluberton, Chair  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As I indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

After due consideration, the Commission has decided to take no further action on the proposal, as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.

When the Entry Commission considered a petition to limit the pound fisheries in Southeast Alaska in 1994, ADF&G Commissioner Carl Rosier sent us a memorandum regarding the Department's management and conservation concerns with the fisheries in the Hoonah Sound and Craig/Klawock areas. The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two



smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you have any questions regarding this matter.

Yours Truly,  
Commercial Fisheries Entry Commission

Bruce Twomley, Chairman  
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)  
Sitka Tribe of Alaska  
Southeast Alaska Seiners Association



Submitted By  
Alaire Hughey  
Submitted On  
12/28/2017 11:17:09 PM  
Affiliation  
Ms.  
  
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9077389252  
Email  
[hughey.alaire@gmail.com](mailto:hughey.alaire@gmail.com)  
Address  
220 Lakeview Dr.  
Sitka, Alaska 99835

I am writing in opposition Proposal 94 and Proposal 104 and support of STA proposals 99, 105, and 106. I am a non-Native person and I was born and raised in Sitka. I started working in hatcheries when I was 14 years old and have gone on to work as a tech on multiple fisheries research and monitoring projects. I have also assisted in conducting ethnographic research on fisheries policy in Southeast Alaska, focusing primarily on the Sitka Sound herring fishery. What I have learned from my experience is that the state has tended to underestimate and disclude the vast knowledge of Lingit people generally, and STA specifically.

Lingit people have lived sustainably on this land for thousands of years and have passed down that knowledge through culture and oral history. While ADFG uses a 50-odd year baseline for data analysis, STA uses data from oral history that is thousands of years old. There are elders among us who have been alive longer than ADFG's baseline and say that they remember much higher populations of herring. This knowledge should be trusted!

I suspect that this disregard for Native knowledge and culture is related to the very recent colonization and continued racism that has shaped resource management policy in Alaska and the U.S. more broadly. To ignore the warnings and pleas of those who have lived here longer is thus not only foolish, but reminiscent of the processes by which Native lands have been taken, Native children have been forced into assimilation boarding schools, Native languages and cultures have been shunned, Native people have been openly discriminated against, and Native resources have been over-hunted and over-fished. Herring are not only an ecological keystone species, but a cultural keystone species, and the health of their populations is critical to the continuation of Lingit culture. To further reduce their population is then a continuation of colonization.

Furthermore, it is a violation of the United Nations Declaration of Rights of Indigenous Peoples ([http://www.un.org/esa/socdev/unpfii/documents/DRIPS\\_en.pdf](http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf)):

#### **Article 24**

1. Indigenous peoples have the right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, animals and minerals. Indigenous individuals also have the right to access, without any discrimination, to all social and health services.
2. Indigenous individuals have an equal right to the enjoyment of the highest attainable standard of physical and mental health. States shall take the necessary steps with a view to achieving progressively the full realization of this right.

#### **Article 25**

Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.

#### **Article 26**

1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired. 2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. 3. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned

If we wish to conserve the herring population (as well as the thousands of other organisms their population health affects) and support the growth of Lingit culture, it is our duty to heed the concerns of Tlingit experts.



Submitted By  
Alan Otness  
Submitted On  
10/2/2017 10:21:11 AM  
Affiliation  
Sitka sac roe permit holder  
  
Phone  
9077723458  
Email  
[adotness@gmail.com](mailto:adotness@gmail.com)  
Address  
696 Mitkof hwy box 317  
Petersburg, Alaska 998330

Dear Chairman Jensen:

I am writing to give my support for proposal EF-F17-067. There are many good reasons why this proposal , open pound spawn on kelp as an alternative to seining , makes sense.

I was involved with the experiment to test the open pound idea in Sitka and came away from that experience enthusiastic about the possibilities. Let's make this happen.

Sincerely, Alan Otness. Sitka Sac Roe Permit Holder



# Alaska Longline

## FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

To: Alaska Board of Fisheries

From: Linda Behnken, Alaska Longline Fishermen's Association

Date: December 27, 2017

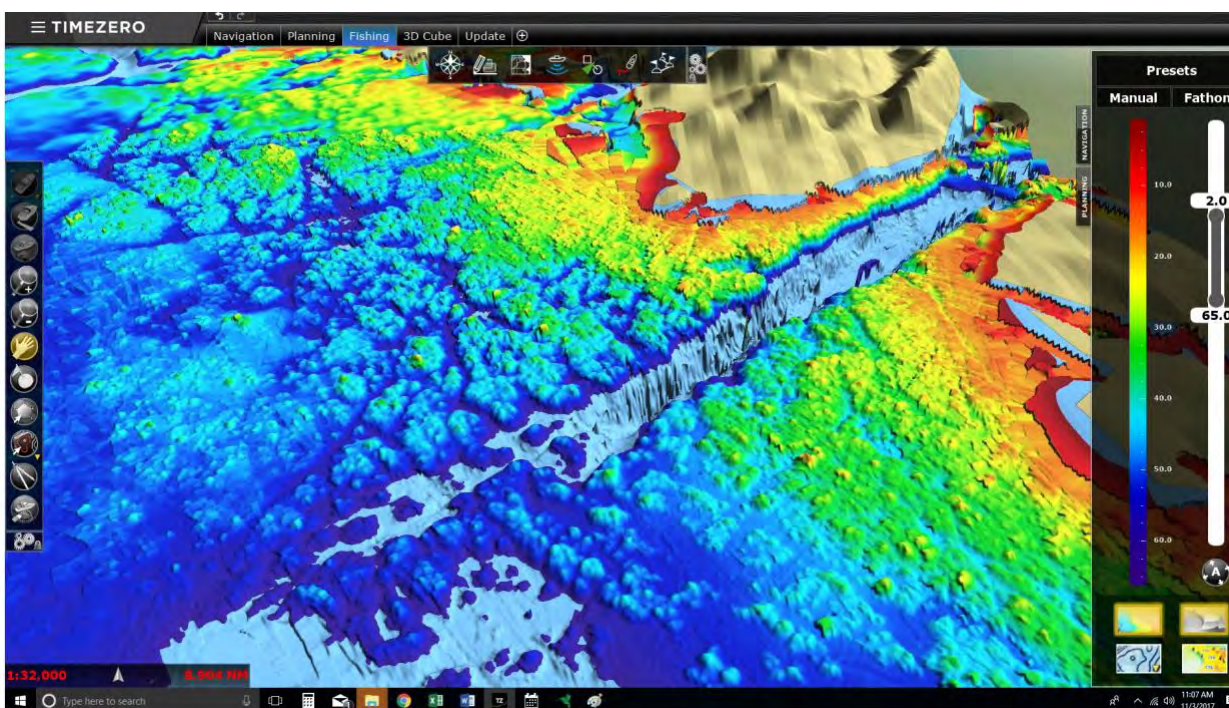
Subject: SE Groundfish proposals and general comment on SE Salmon management

Dear Members of the Board,

The Alaska Longline Fishermen's Association (ALFA) is a Sitka-based organization of vessel owners and deckhands committed to sustainable fisheries and thriving fishing communities. Our members longline for halibut, sablefish, and rockfish; many also troll, seine, gillnet or tender for salmon during the summer months. Before addressing specific proposals, I would like to provide you with an update on work ALFA initiated nine years ago in direct response to a challenge from the BOF.

In 2009, ALFA launched a Fishery Conservation Network to directly engage fishermen in research and conservation and to encourage collaboration between fishermen and scientists. In response to a challenge from the BOF, the first focus of ALFA's FCN was to identify high rockfish bycatch areas, map the habitat that concentrates rockfish in these areas, and provide our commercial fishing members with the tools to efficiently harvest target species while controlling rockfish bycatch rates. The Board issued this challenge to both commercial and charter sectors after a hard-fought rockfish allocation battle between the two sectors. To meet the challenge, ALFA initiated: 1) a rockfish bycatch logbook program to collect target species (halibut and sablefish) and bycatch rate data by set quadrant from members; and 2) a seafloor mapping network to create detailed bathymetric maps. To date, ALFA FCN members have contributed rockfish bycatch rate data for 1,105 sets (with catch verified by ADFG fish tickets), and 110 million bathymetric data points. ALFA has compiled this information and provided members with maps identifying rockfish bycatch hotspots and detailed interactive seafloor maps to assist members in improving fishing efficiency, controlling bycatch, and minimizing habitat disturbance. For illustration, a sample seafloor map is below, and an ALFA rockfish bycatch logbook page is attached to these comments. We are currently in the process of updating bycatch hot spots maps, and will share this update with the Board in January, but after the first three years of operating the rockfish network, members had reduced rockfish bycatch by 20% in the halibut target and 7% in the sablefish target (where rates were already well below bycatch allowances). Six years into the project, members were effectively controlling bycatch to allowed rates with minimal exceptions, and the longline fleet as a whole is remaining below its SE rockfish allocation.





ALFA Fishery Conservation Network bathymetric map: Whale Bay Area

Since 2009, ALFA has grown the FCN to include a number of other research and stewardship projects, including improved fleet fuel use awareness and efficiency, electronic monitoring of catch to provide small boats with a viable alternative to mandatory observers, and collaborative work to avoid marine mammal depredation on longline gear. We invite you to read about FCN projects on the ALFA (<http://www.alfafish.org/bathymetry/>) or SEASWAP (<http://seaswap.info>) websites. Again, the BOF catalyzed this effort, and we hope you find this update interesting.

With that introduction, we respectfully submit the following comments on the Southeast groundfish proposals before the Board in January 2018.

**Proposal 116:** proposal 116 will establish bag, possession and annual limits on the non-resident recreational harvest of sablefish. **ALFA supports this proposal.** Sablefish stocks in Southeast Alaska have been fully utilized since the early 1980s. Stocks are currently near historic low levels, and commercial fisheries have endured years of conservative quotas to safeguard the future of the stock. Meanwhile, sport harvest of sablefish has increased from less than 5,000 fish to over 13,000 fish between 2010 and 2016, increasing pressure on the stock and displacing historic harvesters. Good management demands all users share in conserving the resource. According to information provided to the Sitka Fish and Game Advisory Committee in November 2017, 95% of the sport harvest of sablefish is by non-residents. Extending the non-resident limits currently in place in District 12 (Chatham Strait and lower Lynn Canal) to the rest



of Southeast will provide ample harvesting opportunity to non-resident anglers while providing a measure of protection to the resource and those who have historically depended on sablefish stocks against the rapid growth of the guided sport industry.

In advocating for timely adoption of this proposal, ALFA would note the following:

- There is no limit on entry for sablefish anglers or guided sablefish operators. This proposal does not limit the number of people that can participate in the fishery but does establish reasonable harvest limits on non-resident anglers, balancing the interests of this growing sector against resource constraints and the dependence of historic harvesters.
- Bag, possession and annual limits combined with a system to more accurately account for catch will help protect the long-term sustainability of the sablefish resource while maintaining angler opportunity to harvest sablefish.
- Ongoing declines in halibut abundance and anticipated reductions in halibut catch limits are likely to increase non-resident/guided sport pressure on sablefish stocks.
- NMFS' 2017 trawl survey indicates that a strong year class may be poised to recruit to the sablefish fishery, but the survival and ultimate contribution of this year class to sablefish yield and productivity remains largely unknown. Protecting this year class and allowing what are now juvenile fish to survive and grow to maturity will determine the near and long-term future of this valuable fishery.
- Even with the proposed sablefish bag limit in place, non-resident recreational fishermen in Southeast will still be allowed a total groundfish/salmon daily bag limit of 35 fish, providing more than adequate harvesting opportunity.

ALFA considers the bag, possession and annual limits identified in Proposal 116 to be acceptable; that said **we support and recommend the more conservative limits adopted by Sitka Fish and Game Advisory Committee of 2 daily, 2 in possession and 6 annually.**

**Proposal 117:** ALFA opposes this proposal to allow pots in the sablefish personal use fishery. Although pots may have a lower bycatch of rockfish and halibut, the bycatch of crab in pots is higher. We also disagree with the proposer relative to the hazards of lost pots versus lost longlines: while most longline boats have the stability and hydraulic capacity to retrieve a longline tangled with another longline, many do not have the capacity to retrieve a lost pot. Furthermore, ALFA members' experience with lost gear is that longlines cease to catch fish after five to seven days, while pots will rebait and kill fish for up to a month.

**Proposal 118- 121** would change season opening dates, allow groundfish pots in the SSEI Sablefish fishery, and/or provide additional harvesting opportunities to vessels deploying pots. **In our view, SSEI permit holders should have the opportunity to determine management policy for this fishery.** Relative to these proposals, we note the following: whale predation on hook and line-caught sablefish has never posed a significant issue in Southeast inside waters, but entanglement with lost pots certainly has. Adding additional pot gear to an area with a steep bathymetry and high currents can be expected to result in additional lost gear, which



should be weighed against any conservation claims made in favor of pots. ALFA notes that the majority of these SSEI proposals are submitted by a single individual who has a strong preference for pot gear and currently fishes multiple permits with pots but is interested in additional harvesting opportunity. Our membership believes the proposer should solicit input from SSEI permit holders to determine their interest in expanding the use of sablefish pots in this area and report that position back to the Board.

Relative to claims that whale predation is a resource threat and the sablefish catch limits of those harvesting with hook and line gear should be reduced, ALFA would remind the Board that predation on inside waters has been insignificant, and that sablefish are a natural prey species of sperm whales. There is little justification for the resource reallocation requested by the proposer.

**Proposal 122:** **ALFA OPPOSES** this proposal to eliminate the sablefish stock assessment on inside waters. While tagging data establish that sablefish do move between Chatham Strait, British Columbia and the Gulf of Alaska, stock trends can vary in scale, magnitude or timing. ALFA supports strong science-based management informed by the best available information, and we consider the ADFG inside water sablefish assessment to be an important component that management structure.

**Proposals 127:** ALFA supports this proposal, which directs the Department to manage non-resident and resident pelagic rockfish harvest separately, and to reduce non-resident bag limits for pelagic rockfish as needed to control harvest without changing resident bag limits. Resident harvest of pelagic rockfish has remained relatively stable for the past decade while non-resident or guided sport harvest has increased substantially. Reducing non-resident limits is an appropriate management response to increased non-resident harvest and will provide the necessary protection to rockfish stocks without unnecessarily reducing resident access.

**Proposal 129:** **ALFA supports** this proposal, which clarifies the commercial rockfish trip limit definition and reduces trip limits for the East Yakutat section to prevent guideline harvest level overages while still allowing a fishery to take place. We recognize the Department's concern relative to rockfish stock declines and support conservative management that prevents GHV overages.

**Southeast salmon proposals:** ALFA urges the Board to take appropriate action to conserve Southeast wild Chinook stocks of concern while minimizing impacts to Southeast salmon fisheries. In our view, these dual goals are best met by management actions that comprehensively address all user groups--sport, commercial, troll, seine and gillnet—and fairly assess the impacts of each user group to salmon stocks in general and the stocks of concern in particular. A number of proposals (e.g. 132-134) disadvantage one user group to the advantage of another under the unsupported guise of conservation; we urge the Board to guard against taking such irrational and allocative actions. Conservation demands ALL sectors fairly reduce harvest proportional to their impacts to stocks of concern; the only winners in the conservation battle should be the fish. Our review of data shared to date by the Department and compiled



by concerned salmon fishermen indicates that the Department is chronically underestimating guided sport harvest of Chinook and overstating troll impacts. We urge the board to look carefully at coded wire tag data as well as genetic data, and to ensure data are accurately expanded when monitoring is limited. Additionally, we urge the Board to carefully develop management strategies that protect stocks of concern while providing maximum access to healthy salmon stocks, and note that spatial/temporal management (i.e., allowing fishing in areas and during times of the year when historically catch of SE wild Chinook has been minimal) is far less damaging than closures of all areas across broad time periods. ALFA asks the Board to devote the necessary time to develop a spatial/temporal approach to Chinook management. While it will clearly take more of the Board's time and a more in-depth review of the data, such an approach will provide the necessary protection to stocks of concern while imposing far less cost on Southeast fishermen and communities than the more simplistic, broad-based closure.

Thank you for the opportunity to comment. We anticipate providing additional information and testimony to the Board during your January 2018 meeting.

Sincerely,

A handwritten signature in cursive script that reads "Linda Behnken".

Linda Behnken

Alaska Longline Fishermen's Association  
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Term Whale Hotline Number: 907-747-3600

Page \_\_\_\_ of \_\_\_\_ for trip

Vessel: \_\_\_\_\_ **ALFA Fishery Conservation Network Logbook Sheet: Bycatch**

Date: _____	% DSR _____	% DSR _____	% DSR _____	% DSR _____	Total for Set:
Set: _____	% slope _____	% slope _____	% slope _____	% slope _____	DSR _____ Slope _____
Trip: _____	% Target _____	% Target _____	% Target _____	% Target _____	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers
Target species: _____	_____ fm	_____ fm	_____ fm	_____ fm	Target _____
					<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers

Observations : \_\_\_\_\_

Date: _____	% DSR _____	% DSR _____	% DSR _____	% DSR _____	Total for Set:
Set: _____	% slope _____	% slope _____	% slope _____	% slope _____	DSR _____ Slope _____
Trip: _____	% Target _____	% Target _____	% Target _____	% Target _____	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers
Target species: _____	_____ fm	_____ fm	_____ fm	_____ fm	Target _____
					<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers

Observations : \_\_\_\_\_

Date: _____	% DSR _____	% DSR _____	% DSR _____	% DSR _____	Total for Set:
Set: _____	% slope _____	% slope _____	% slope _____	% slope _____	DSR _____ Slope _____
Trip: _____	% Target _____	% Target _____	% Target _____	% Target _____	<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers
Target species: _____	_____ fm	_____ fm	_____ fm	_____ fm	Target _____
					<input type="checkbox"/> lbs or <input type="checkbox"/> Numbers

Observations: \_\_\_\_\_

Total pounds from fish ticket: Halibut: \_\_\_\_\_ Sablefish: \_\_\_\_\_ Yelloweye: \_\_\_\_\_ other DSR: \_\_\_\_\_

SR: \_\_\_\_\_ RE: \_\_\_\_\_ Idiots: \_\_\_\_\_ other slope: \_\_\_\_\_ pelagic rockfish \_\_\_\_\_





Submitted By  
John Carle @ Delbert Kadake  
Submitted On  
12/28/2017 8:14:21 PM  
Affiliation  
Alaska Native Inter-Tribal Association of Seiners (ANITA)

**ANITA, the Alaska Native Intertribal Association of Seiners**, was formed in April of 2017. We currently have 25 seine members, both voting and associate. ***Our board of directors includes Frank Wright, of Hoonah, Jeb Phillips of Petersburg, Jeff Jackson of Kake, Secretary-Treasurer Nick Demmert, Vice President John Carle and President Delbert Kadake, of Kake.***

From the very first commercial fisheries conducted in SEAK, the Tlingit and Haida people were instrumental not only in the harvest but also the processing, shipping, trap-siting and spotting, and transportation in the seafood industry. Entire families have moved from their winter villages to the canneries, cold storages and fishing plants to sustain the industry. And the industry being sustained by us also sustained us with relatively recognizable and achievable economic activity. Much of the total community involvement has changed as have so much of our culture in these modern times but there is still a major economic connection and engine with our involvement with the salmon and herring especially with commercial purse seining.

Although the industry has consolidated and many former canneries near our villages have long since vanished the major direct connection that the Tlingit and Haida peoples and the approximately 30% of Southeast Alaska's purse seine fleet that are members of SEALASKA.

There is no disrespect intended upon those non-SEALASKA members or whose families came later to our fisheries nor is any disrespect intended to the other seine associations. We believe that it is time we ourselves weighed in with our own group on our fervent belief in the state of Alaska's management system being the correct way to go and supporting the best available science to insure that the continuing generations of Alaskans, native and non-native alike, can share in the amazing bounty nature has provided our people for several millenium.

Unlike many other jurisdictions in the US as well as Canada, we believe in one management agency, the state of Alaska, and fishing competitively alongside all other fishermen as equals.

We look forward to meeting with the Alaska Board of Fisheries members in Sitka. While several of our board will be winter crab fishing up and down the coast, we will be represented and be at all of the finfish portion of the meeting.

Sincerely,

John Carle, Vice President, Alaska Native Inter-Tribal Association of Seiners

Delbert Kadake, President, Alaska Native Inter-Tribal Association of Seiners

#### **Proposals Supported by Alaska Native Inter-Tribal Association of Seiners**

**Support: 140, 142, 143, 145, 155, 166**

#### **Proposals Opposed by Alaska Native Inter-Tribal Association of Seiners**

**Oppose: 141, 146, 154, 156, 157, 158, 167, 168, 169, 170, 173, 174, 185**



## 2018 Board of Fisheries Positions

ATA represents commercial hook and line salmon fishermen who operate in state and federal waters off Alaska. There are nearly 2,000 troll permits (2017 = 963 Powertroll / 959 Handtroll) and about half are fished each year. The troll fleet is 85% resident; about 1 in 35 people in Southeast Alaska works on a troll boat.

**37 Allow gillnetting in waters near Kayak Island.**

**Oppose**

As the proposer states, this area was closed to Copper River fishermen in the early 1980s to protect Situk River and other depressed Alaska stocks. Around the same time, trollers lost fishing access West of Cape Suckling, due to similar conservation concerns. Trollers have statewide limited entry permits, but are currently restricted to the Southeast region. If Kayak Island is re-opened to gillnetting, we would like to also see West of Suckling re-open to the troll fleet. However, given that Chinook stocks from Prince William Sound to Dixon Entrance are experiencing a period of low productivity, it is difficult to envision either fishery being re-established any time soon.

**123 Increase the minimum retention size for lingcod in the Eastern Gulf of Alaska Area commercial fishery.**

**Oppose**

The sponsors claim there will be positive impacts on lingcod recruitment from increasing the size limit to 30", but we have been unable to find data to support the extent to which that might be true. The size limit was originally established to protect sexually mature females and nest guarding males. It is also used as a means to keep the sport harvest within its allocation. This proposal includes no justification as to why the dorsal fin/tip of tail measurement was selected and it's unclear if use of those reference points is even appropriate. Based on ADFG statements and anecdotal information from the fleet, lingcod stocks in Southeast are abundant and subject to a conservative management program. Increasing the size limit does not appear to offer benefits for the resource, could reduce the commercial harvest, and is likely to shift effort away from male fish onto larger, more fecund females. That could ultimately harm the lingcod resource and all user groups.

**132 Amend king salmon regulations in Districts 11, 12, 14 & 15 based on Taku River preseason escapement estimate.**

**Oppose**

This proposal would remove important flexibility from ADFG's management program. ADFG already has adequate Emergency Order (EO) Authority to implement measures to protect the stocks in question. See ATA comments on Proposal 133 regarding methodology and the Pacific Salmon Treaty.



133

**Base duration of commercial salmon troll and drift gillnet gear spring openings on  
preseason king salmon abundance projections.****Oppose**

The proposer seeks to improve escapement by establishing arbitrary fixed parameters to control the length of troll and gillnet openings for king salmon in districts 9, 12, and 14, based on preseason forecasts of terminal run size. The recommended methodology is contrary to MSY escapement goal management and could therefore be ineffective at achieving the goal of recovering stocks to harvestable levels. Additionally, it could be allocative; removes management flexibility; and, prevents ADFG from doing anything inseason but further reduce harvest. This proposal is unnecessary, because managers already have, and are exercising, EO authority to implement the measures they believe necessary to protect the stocks in question, while also permitting safe levels of fishing when and where appropriate.

ADFG stated in a September 29, 2017 memorandum recommending stock of concern status for several Chinook stocks, including the Chilkat, '*...that very poor marine survival has been the primary factor behind the recent period of poor production of Southeast Alaska king salmon stocks.*' Consequently, we question the need to drastically modify Southeast Chinook management plans for what could be a short-lived situation that can be addressed through EO authority.

Proposal 133 relies on preseason forecasts of abundance coupled with a three-tier system to define management action for the troll and gillnet fisheries. The plan does not consider the fact that the Chilkat, Taku, and Stikine forecasts are all unique - which one will be used to dictate management? While use of inseason indicators is mentioned for reducing harvest in the event the terminal run prediction is poor, the proposal lacks specific provisions for lifting restrictions based on improved forecasts.

The Chilkat, Taku, and Stikine Chinook travel through districts 9, 12 and 14 at different times and in variable proportions. Managing effort in non-directed fisheries spread out over hundreds of miles, based on a randomly selected proportion of a forecast, does not necessarily deliver fish to the river. Still, the proposer wants to significantly restrict distant water troll fisheries, even when Taku kings are expected to meet the point goal. Why would any Southeast fishery be shut down for 'conservation' if stocks are expected to make the MSY goal?

ADFG managers put escapement first, as they should, and they have a history of consistently managing Southeast Chinook to achieve the MSY goal range. The Taku River Biological Escapement Goal (BEG) was established in 2009. The BEG is 19,000 - 36,000 large king salmon, with a point goal of 25,500. Since then, the lower end of the goal range has been missed just three times. The lower end of the range is simply that - anything within the range is considered safe and is anticipated to achieve MSY, which is why ADFG usually manages for the mid-point of the range. From 2012-2016, Taku River missed the lower end of the goal three times and the harvest rate averaged a modest 18%. For the same period, Chilkat River missed the lower end of the goal four times, and the harvest rate averaged just 14%. Given the low exploitation rates, it is clear that marine survival is having a significant impact on escapement performance.

Due to a variety of factors, recent preseason forecasts for the Taku and Stikine Rivers have been highly variable and at times unreliable. Using the fixed methodology suggested would make it easy to inadvertently take too many, or too few fish.





On June 9, 2011 ADFG issued a news release closing District 8 and Section 11-B, stating that the Stikine king salmon terminal run forecast had been revised down from 30,000 fish to 18,900; the Taku River projection was cut from 40,986 to 16,600.

On December 9, 2013, ADFG issued a terminal run size forecast for the Stikine River of 26,000 fish. The news release specifically stated that the actual forecast predicted 1,700 more fish, but due to recent year over-estimation of the run, and poor recent year performance of local stocks, ADFG was downgrading the forecast as a precaution. Actual escapement of large fish (>660mm) was within goal at 16,783.

Adjusting the forecast with inseason abundance estimates can also be challenging. In June 2015, ADFG noted that poor river conditions negatively affected the mark and recapture assessment program. The result was that ADFG left the preseason forecast unchanged, despite any run strength – or weakness – that might have materialized inseason. Actual 2015 escapements of large fish to the Taku and Stikine were 21,597 and 28,827, respectively, and well within goal.

Given the variability of forecasts, one could envision a time where the regulations in this proposal could require ADFG to open a fishery against their better judgement and place fish at risk, because river conditions don't allow for a revised inseason stock assessment and the forecast was not upgraded. Conversely, it could also restrict traditional harvests unnecessarily, by implementing punitive restrictions - even when a forecast is well within the MSY escapement goal range. Better to leave the decision in the hands of ADFG, so they can rely on the variety of tools at their disposal to evaluate stocks and manage fisheries inseason.

This proposal is also contrary to an agreement under the Pacific Salmon Treaty (PST) relative to the Taku and Stikine rivers and could cost Alaska harvest share. Alaska and Canada spent a considerable amount of time negotiating the conditions that would allow directed fisheries on these stocks. For the Taku, it was decided that achieving midpoint of the escapement goal was best for conservation. Directed fisheries are allowed whenever the District 11 terminal run size is predicted to be equal to, or exceed, the midpoint escapement goal. The terminal run size estimate accounts for the troll harvests outside D11 (PST, Annex IV Chapter 1 3. (b)(3)(viii) Footnote 6, p.37), which are counted under the annual PST Chinook quota. There is a similar harvest sharing plan between Canada and Alaska for the Stikine River. Proposal 133 would effectively override this fundamental agreement between the countries and could cause Alaska to forego a portion of its negotiated harvest share, even when there are adequate fish returning to the system to meet escapement and fish.

The proposer targets troll fisheries that are far removed from the Chilkat and Taku rivers, yet there is no mention of sport fisheries in the areas we fish, or the fact that up to 20% (13% on average) of the sport Chinook harvest in Petersburg-Wrangell are Taku fish (Mixed Stock Analysis of Chinook Salmon Harvested in the SE AK Sport Fishery, 2004-2015, S. Gilk-Baumer, et al., in progress 2017). Trollers don't really have much direct impact on these systems.

The BOF developed the Taku River Management Plan (5 AAC 29.097) in District 11 to implement the PST agreement. It currently provides almost no opportunity for trollers to target Taku Chinook in years of allowable harvest. During the years a directed treaty harvest was allowed, trollers caught less than 50 fish, while the gillnetters caught more than 30,000.

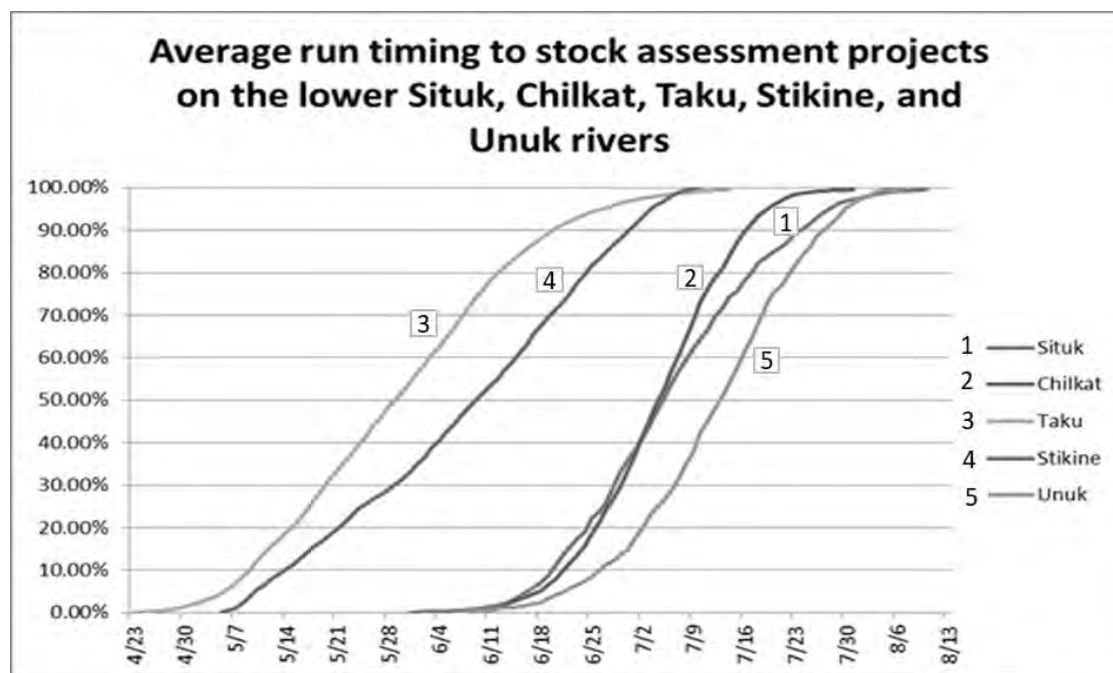


The Chilkat River is raised as a concern in this proposal. The troll fleet is already managed to provide protection for a stock that we are barely allowed to harvest. From 2007-2016, ADFG estimates the spring troll fishery averaged 123 Chilkat fish; during the most recent five-year period that average fell to 51 fish (ADFG, 8/17). While Chilkat has been listed as a stock of concern, note that in two of the years the stock came in under goal, escapement was missed by just 27 fish one year and 31 the next. It would be difficult for a terminal fishery to pass that small a number of fish to the spawning grounds without significant disruption, much less one that mostly occurs one hundred miles away, or more.

The troll fleet is already restricted in time and area from direct harvest of Chilkat king salmon through the Lynn Canal and Chilkat River King Salmon Fishery Management Plan (5 AAC 33.384) (33.384(e)(1)) closes the troll fishery north of Seduction Point through July 14. By that time, 100% of the Chilkat River Chinook run has usually entered the river (see graph below). In recent years, ADFG has taken added precautions in the outer corridors during the late winter and spring troll fisheries to further protect this depressed run, including troll closures.

While we don't support this proposal for any fishery, the restrictions called for do not treat the troll and gillnet fisheries equally in all but one case. For example, the gillnetters would lose their directed fishery in front of the river, but could still retain king salmon taken during other fisheries. Trollers would have to give up significant numbers of wild and hatchery kings and coho, some distance from the river where Taku River Chinook are only taken in small numbers, and mostly during fisheries directed at the hatchery king salmon we pay for. Both fisheries would be denied the directed PST fisheries on both the Taku and Stikine.

The proposed plan also fails to adequately consider differences in run timing of either the stocks referenced or the fishery. As you can see from the graphic below, run timing is unique for each of these stocks. If the goal is to get fish into the rivers, it makes more sense to manage all fisheries and recognize this timing. For instance, restrictions should be lifted from the more distant troll fisheries on a date earlier than the terminal sport and net fisheries.



ADFG, 2017



Management actions to address conservation must be timely and contextual. ADFG uses preseason and inseason forecasts long with other pertinent data to make management decisions. When problems or opportunities arise, managers must have the flexibility to respond, as evidenced by significant actions taken in recent years, especially in 2017, to protect Taku, Chilkat, Stikine, etc. We believe that ADFG has the expertise, tools, and management plans necessary to balance conservation with fishing opportunity – no new regulations are needed here.

ATA fully appreciates the need for conservative management of all fisheries harvesting Southeast Chinook stocks during this time of uncertainty. However, late winter and spring trolling is an important source of revenue for rural fishing communities, so it is important that conservation measures are effective in getting fish to the rivers and that fishing opportunities be provided whenever possible. Harsh weather conditions can make it tough for fishermen with small vessels to compete in winter and early spring. Districts 9, 12, and 14 are relatively protected areas that provide good fishing opportunities for small boat owners and others from the inside communities. A portion of the spring troll Chinook catch is sold fresh, which typically yields a higher price for the fleet and processors. Spring fisheries help the industry maintain a year-round market share and compete with farmed salmon.

- |            |   |               |
|------------|---|---------------|
| <b>134</b> | <b>Close the spring commercial salmon troll fishery in Districts 9, 12, and 14 when the Juneau area sport fishery is closed to protect king salmon.</b> | <b>Oppose</b> |
|------------|---|---------------|

ADFG has EO authority to implement appropriate measures to protect the stocks in question. ADFG's highly precautionary management actions in 2017 and current proposals for several stocks of concern, including Chilkat, show that the department will act when necessary to achieve escapement goals. This has already involved time/area closure of troll and sport fisheries.

It's important to remember that the current low productivity is not limited to the Taku and Chilkat rivers, it's regionwide, extending as far north as the Copper River in recent years. This looks to be more about marine survival than fishing. ADFG has managed prudently during this time of uncertainty. The department managers should be allowed to maintain the flexibility necessary to manage fisheries according to data and inseason circumstance. It is far too early to revamp management plans on a permanent basis, particularly on stocks that until just recently were among the most robust on the West Coast.

- |            |   |                |
|------------|---|----------------|
| <b>136</b> | <b>Extend the area closed to sport fishing near Situk River weir in June and July.</b>  | <b>Support</b> |
| <b>139</b> | <b>Eliminate provisions for a rotational fishery in Southeast Cove Terminal Harvest Area and allow the department to manage the fishery in consultation with the hatchery operator.</b> | <b>Support</b> |
| <b>144</b> | <b>Allow increased commercial salmon fishing opportunity with troll gear in the Deep Inlet Terminal Harvest Area.</b>   | <b>Oppose</b>  |



**146 Do not include enhanced salmon produced by private nonprofit hatcheries in Southeastern Alaska Area Enhanced Salmon Allocation Management Plan gear-specific value allocations.**

**Oppose**

This proposal seeks to remove the value of salmon produced at the private non-profit (PNP) hatcheries from the 5 AAC 33.364 Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (allocation plan) and states that not counting the PNP fish would help the fleets achieve their allocated percentages without disrupting hatchery production or other fisheries. The maker of this proposal seems to think that the Prince William Sound (PWS) allocation plan is superior, because it doesn't include PNP fish. Ironically, other fishermen have submitted BOF proposals asking to add the value of PNP production to the PWS plan, because they see that removing PNP fish can result in a single user group disproportionately benefitting from the region's enhanced production, despite a regional allocation plan.

The proposal also suggests that the PNP hatcheries have less financial wherewithal than the Regional Associations (Regionals). While they don't directly receive 3% money, PNP hatcheries have received special considerations and utilize the same pools of public funds as the Regionals; this has allowed PNP operators to expand their facilities and thrive. Therefore, it seems fitting that the value of the fish produced at PNPs be included in the allocation plan.

Finding 94-148-FB contains the original report of the Southeast Alaska Allocation Task Force (SATF) submitted to the BOF and ultimately set into state policy. It established the allocation plan parameters and specifically included enhanced salmon from the PNPs. PNP operators have had a voice and a role to play since the beginning of the enhancement program. The SATF included a representative of Douglas Island Pink and Chum (DIPAC) hatchery. Numerous project proposals have been submitted by the PNPs that include the allocation plan as part of the justification.

The allocation plan included fourteen guiding principles and performance goals. Since they do not derive revenue from the 3% salmon enhancement tax, PNP's were granted special dispensation under guiding principal #1. Specifically, until a PNP state loan debt is repaid, the plan allows PNP's to drop their contribution rate to the common property fishery from 70% to 60%.

Like the Regionals, PNPs that achieve the performance goal and apply for a loan under the Fisheries Enhancement Revolving Loan Fund have been recommended for priority funding. Some Southeast PNP's have received financial and in-kind assistance from the Regionals. Most have secured millions of dollars in Pacific Salmon Treaty (treaty) mitigation money, to produce fish to help mitigate losses under the treaty and balance the enhanced salmon allocation.

The maker states that the PNP boards won't always be made up of a good mix of fishermen. That is a legitimate concern, but history reveals it to be largely unfounded. At least two PNP's in the region have evolved in such a way that they now include board seats for all commercial salmon fisheries.

The troll fleet has chronically lagged behind on its allocation of 27-32%. The seine and gillnet preliminary allocations are 43% (44-49%) and 39% (24-29%), respectively. Our preliminary five year rolling average is 18% (2012-2016). Still, we do not support at this time modifying any aspects of the plan through proposals or a task force, as was suggested during the October 2017 Work Session. Doing so would be an unnecessary expenditure of time and monetary resources for all involved.



The reasons that the troll fleet has been unable to reach its allocated percentage are many and varied. For instance, spring conservation measures are currently having a negative impact the troll fleet's hatchery harvest and will do so for a while. The Regional Planning Team (RPT) and individual operators have been working hard to resolve the problem by searching for the right mix of solutions to bring trollers into range. Southeast is a large region and each hatchery operator is uniquely challenged when it comes to delivering fish to the fleets. Emerging opportunities to target hatchery Chinook, coho, and chum should help better distribute hatchery fish and improve the allocation numbers, but that will probably not be possible for the troll fleet if the PNPs are removed from the equation. Klawock Hatchery was a PNP until just recently and that facility alone has contributed up to 100,000 coho a year to the troll fleet. Trollers catch lots of fish contributed by the PNP's and removing that production value from the allocation could seriously impact our fleet's ability to attain its allocation target.

Therefore, ATA prefers that no action be taken on this proposal. The RPT and hatchery operators should continue to work within the parameters of the current allocation plan, in hopes of ultimately achieving the original goals that the BOF established for all the Southeast commercial fleets.

**148      Expand the Herring Bay Sportfish Terminal Harvest Area to provide additional sport fishing opportunity for hatchery-produced king salmon.      Oppose**

This proposal would expand what is already a fairly large terminal area in a corridor for depleted Unuk River Chinook salmon, as well as increase the sport bag limit. There is a high likelihood that a significant number of Unuk River fish will be caught if this proposal is passed.

For the past three years, significant management restrictions and closures have been implemented in the spring troll fisheries targeting hatchery fish in this area. 2018 is likely to see additional restrictions to protect Unuk River Chinook.

The Unuk River was recently added to the stocks of concern list and the BOF will consider an action plan for this stock at the January meeting. It is unacceptable at this time to contemplate increasing Chinook harvest opportunity for any fleet fishing in the terminal areas where Unuk River fish are the most vulnerable.

**149      Extend the closing date for salmon harvest by the hatchery permit holder in Deep Inlet Special Harvest Area.      Support**

**150      Establish a special harvest area in Crawfish Inlet.      Support**

Proposal 150 expands the SHA past 135° 11.05' W, specifically to benefit the troll fleet. The project was permitted with the understanding that it could help address allocation imbalance. Chinook will begin returning to Crawfish Inlet next spring and early indications suggest that the run could be large.

NSRAA plans to release up to 600,000 Chinook salmon and 50 million chum salmon at Crawfish Inlet. This program could inject roughly \$4 million dollars into the common property fishery and provide great benefits to all three commercial salmon fleets, processors, sport fishermen, and local communities. The expanded area as envisioned would allow a spring SHA fishery in very

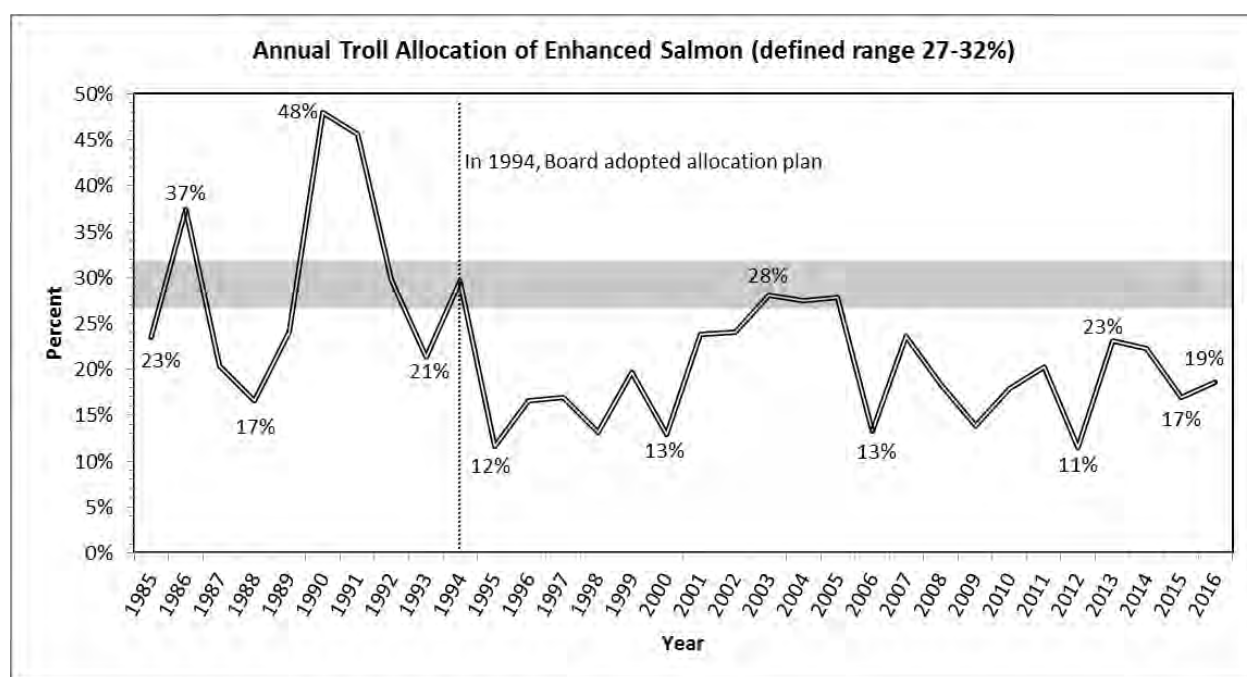




productive waters. This is important in the light of Chinook restrictions the fleet might be facing the next few years.

Since 1985, Southeast fishermen have been restricted to extremely conservative king salmon quotas under the Pacific Salmon Treaty (treaty). Many of the hatchery Chinook produced in our region are considered 'add-on' fish and do not count against the treaty quota. New production at Crawfish Inlet could help mitigate treaty losses. These new Chinook and chum programs could also help correct a hatchery allocation imbalance that the commercial fleets have struggled for years to correct.

Since the allocation plan was established in 1994, trollers have only reached the allocation goal four times. The troll fleet's preliminary estimated share of 2016 enhanced salmon value stands at 19%, which is well below its allocated range of 27-32%. This project is specifically designed to help boost troller's harvest of hatchery fish.



Preliminary 2016 estimate of value: 19% / Final 2015 estimate of value: 17%  
ADFG, April 2017

- |            |   |                |
|------------|---|----------------|
| <b>151</b> | <b>Establish a terminal harvest area and management plan for Carroll Inlet.</b>                             | <b>Support</b> |
|            |   |                |
| <b>169</b> | <b>Open Section 6-D the second Sunday of June to commercial fishing for salmon with drift gillnet gear.</b> | <b>Oppose</b>  |

This proposal would open a significant area to provide opportunity for gillnetters to better harvest pink salmon. The mid-June opening date is of concern, because there are usually lots of Chinook in the area. ATA is opposed to opening 6-D in mid-June, particularly in light of the conservation measures that will be implemented this spring and summer for Stikine and other Southeast Chinook stocks.



Significant conservation measures were taken in 2017 for both Stikine king salmon and McDonald Lake sockeye. The Stikine Chinook are down, and McDonald Lake was recently added back to the stocks of concern list, making this proposal poorly timed. If the proposed fishery expansion is allowed, it could negatively impact Chinook and sockeye moving to the river and disrupt existing troll fisheries targeting hatchery kings at Steamer Bay and lower Stikine Strait.

6-D is right next to D8. Increased exploitation of Stikine Chinook in these terminal areas could place too much pressure on the run, particularly if the very low forecasts prove to be correct.

- |            |  |                |
|------------|--|----------------|
| <b>170</b> | <b>Open a portion of District 10 the third Sunday of June to commercial fishing for salmon with drift gillnet gear only.</b>                           | <b>Oppose</b>  |
| <br>       |  |                |
| <b>173</b> | <b>Allow commercial fisheries using troll gear to target enhanced chum salmon in Districts 12 and 14 to continue by removing the sunset provision.</b> | <b>Support</b> |

The BOF originally approved the Northern Chatham Strait Enhanced Chum Troll Fishery as an experimental fishery with a sunset date, due to a lack of data. Far more is known about the fishery now and we would like to see the sunset date removed and the management plan placed permanently into regulation.

The Chatham Strait chum fishery is very productive some years, and not so much in others. Weather conditions, sea surface temperature, tides, run timing, and other factors must line up just right for chum to bite troll gear. Nevertheless, the District 12 and 14 chum fishery often accounts for a sizable portion of the troll fleet's enhanced salmon allocation. The continuation of this fishery is part of the RPTs strategy for addressing the allocation imbalance.

Overall, this has proven to be very clean and selective fishery. About 85% of the chum harvested are hatchery stocks and the wild chum indicator stocks have consistently met escapement goals. There have been no known conflicts with anglers utilizing the area.

If this fishery were to close, effort would shift. Trollers who would normally target chums at that time may fish for Chinook instead. This would be undesirable side effect during this time of extreme conservation concern; distributing effort over the two species might be preferable.

Icy Strait, Southeast Cove, Neets Bay - and soon Port Lucy and Thomas Bay - form a suite of summer chum opportunities that not only give trollers options, but also spread out effort making for increased harvest efficiency. These fisheries combined with fall chum opportunities at Sitka, Crawfish Inlet, and Neets Bay are an important part of the strategy for addressing enhanced allocation.

Failure to pass this proposal would end the Chatham Strait chum fishery and eliminate an important market. Consumers have come to recognize the extremely high-quality chums this fishery provides and that's created a unique market niche that will be difficult to backfill. Trollers, tenders, fish processors, the communities of Hoonah, Gustavus, Elfin Cove, Excursion Inlet, Juneau, Haines and others would suffer an economic hardship if the opportunity to harvest of these fish was lost.



**174 Establish commercial fisheries targeting enhanced chum salmon using troll gear in portions of Districts 9 and 10. Support**

The strategy to address the troll hatchery allocation imbalance is to direct “new production” toward trollers when and wherever possible. The plan, often cited in RPT reports to the commissioner, lists a suite of new troll opportunities that include Crawfish Inlet (NSRAA), Port Lucy (AKI), and Southeast Cove (NSRAA). Crawfish is a fall chum run and hatchery returns peak in early to mid-August. Lucy and Southeast Cove are summer chum runs and returns peak in early to mid-July.

It is assumed that trollers will be able to intercept chums returning to Southeast Cove along the West shoreline of Kuiu Island in Chatham Strait, and around Kingsmill into Frederick Sound, and into Keku where Southeast Cove is located. Though full production at Southeast Cove is just now coming to maturity, there has not been much troll effort. This year looks to be the first time the essential elements of fish, infrastructure, and a fleet will come together. It is highly likely chums will be migrating along Kuiu near Kingsmill from mid-June into July. Another project in the works is to develop a chum return at Gunnuk Creek near Kake. These fish are likely to pass through the Southeast Cove area and could further assist in rectifying the enhanced hatchery imbalance. The benefits to the community of Kake will be significant.

There is no directed chum salmon troll fishery in D9 & 10, so before July 1 chum harvest can only occur during spring Chinook fisheries. Considering the serious conservation concerns over spring Chinook it seems likely that troll opportunity will be quite limited in June, thus the need for Proposal #174, which would allow a directed chum fishery to occur in June, even in the event of a Chinook closure.

Although the boundaries for the area were set in consultation with ADFG, there has apparently arisen some concern over wild summer chum runs in Saginaw and Security Bays. Our understanding is that ADFG is willing to work with NSRAA and industry to define new boundaries. ATA supports efforts directed toward developing this valuable area to access enhanced chum salmon in a way that protects wild stocks.

**176 Establish a commercial fishery using troll gear to target hatchery-produced chum salmon in Crawfish Inlet during the coho closure. Support**

Crawfish Inlet release site has been developed, in part, to provide opportunities for trollers to harvest hatchery chum salmon and attempt to better balance the allocation of enhanced salmon. The troll fleet is typically closed in mid-August for 2-10 days, to provide for coho allocation and/or conservation; this closure occurs during the peak of the Crawfish chum return.

Current regulations provide for two other hatchery areas to remain open to trolling for chum salmon during the coho closure. We ask that Crawfish Inlet be added to this short list of areas. The entire Inlet has been preliminarily designated as a Terminal Harvest Area, which suggests that the presence of wild coho should be negligible.

**177 Allow commercial fishing with troll gear for hatchery-produced coho salmon, in certain areas, during commercial troll fishery coho salmon conservation closures. S**





We ask that ADFG be given authority to evaluate and open to trolling areas where the harvest hatchery coho during the August troll closure. Allowing ADFG to make determinations on an annual basis will ensure that wild stocks are protected and hatchery broodstock needs are met.

The justification for allowing harvest of hatchery coho during the coho closure is as follows:

a) alleviates some of the imbalance of enhanced salmon allocation; b) provides benefits to smaller vessel operators that might not be able or willing to fish in rough outside waters; and, c) to a small degree, reduces hatchery straying.

### *Enhanced Benefit Distribution*

5 AAC 33.364 describes the guidelines for allocation of enhanced fisheries benefit to the three commercial gear groups of Southeast Alaska. The trollers have been below the allocated range for 23 years and have not been in the guideline range of benefits since the 1990-1994 5-year period. The Regionals and RPT address this issue in all new enhancement plans and the THA fishing schedules.

Board of Fish finding 94-148 FB describes the consensus process that generated 5 AAC 33.364. The findings included 14 guiding principles for the allocation of enhanced fisheries benefits. Guiding Principle 1 defines the purpose of the enhanced salmon program as a benefit to traditional common property fisheries. Guiding principle 11 along with the rationale anticipated the possibility of the June Chinook troll openings as well as other openings.

#### Guiding Principle 1:

*The primary goal of the Southeast Alaska salmon enhancement program is to provide additional fishing opportunities and revenue to traditional common property fisheries.*

The performance goal is the 70% or 60% contribution to common property fisheries after broodstock collection from the Regionals and/or PNPs, respectively. NSRAA and SSRAA documents ([https://www.nsraa.org/?page\\_id=2879](https://www.nsraa.org/?page_id=2879)) (<https://ssraa.org/historic-return-information/>) indicate the coho programs generally do not meet this goal. It is our opinion that however slightly, approving this proposal will move the coho program more towards the performance goal of 60% or 70% contribution after broodstock removal.

#### Guiding Principle 11:

*Achieving these allocation percentage goals should not result in any modifications, in time or area, to the traditional "wildstock" fisheries. Minor modification may be considered to allow experimental or test fisheries that would not adversely impact wildstocks.*

#### Rationale:

*The SATF strongly believed that the common property fisheries for wildstocks should not be manipulated in order to achieve the allocation percentage goals. However, this is not intended to preclude experimental or test fisheries, special hatchery access fisheries or the establishment of new special harvest areas in order to access enhanced fish. For example, this could include the June troll fisheries for Chinook, or late season openings, or other special openings used to target enhanced fish as long as wildstocks are not adversely impacted. It is recommended that the department allow targeted fisheries on enhanced stocks when they will not adversely impact*



*sustained yield of wildstocks. The department should work closely with hatchery operators in establishing these fisheries, keeping in mind the 70% and 60% contribution goals. The harvest of enhanced salmon in a targeted wildstock fishery is considered incidental to the harvest of wild stocks.*

As this Board knows, the June troll Chinook openings are limited and highly regulated, to conserve wildstock Chinook in Southeast Alaska. This negatively affects the proportion of enhanced benefit achieved by the troll fleet. Proposal 177 seeks to add an avenue for the troll fleet to increase their harvest of enhanced coho. **At the moment, the only impediment to doing so is that when the department closes coho for both allocative and conservation reasons, they close both wildstock and enhanced coho.** Proposal 177 allows targeted fisheries on enhanced cohos, while observing all the guiding principles of finding 94-148 FB and all conservation requirements for wildstock coho.

### *Magnuson-Stevens National Standards*

It is anticipated that the areas opened for enhanced coho will be very close to the hatchery or a release site. This will likely mean that smaller boats that suffer competitive disadvantages in bad weather will be able to fish these openings. Magnuson-Stevens Fisheries Conservation Act National Standards 8 (communities' social economic well-being) and 10 (safety at sea) are more closely adhered to when fisheries are available that don't involve going out in the ocean when it is blowing 35 knots on opening day.

### *Reducing Straying*

ADFG is currently monitoring the extent of straying, primarily in the vicinity of hatcheries. One published report involved a survey of recovered CWTs from spawning areas and found little evidence of straying (Special Publication No. 10-10 Wild and Hatchery Coded-Wire Tagged Coho Salmon Recovered as Strays in Natural Spawning Escapements in Southeast Alaska, 1976–2007, L.D. Shaul, April 2010).

Straying of enhanced fish into wildstock spawning areas is a topic that is currently receiving much attention by researchers. Having additional fishing pressure on hatchery stocks reduces potential straying.

### *Potential Applications*

Informal discussions with ADFG staff indicate the most feasible area to implement this proposal is near Klawock Hatchery on Prince of Wales Island. CWT recoveries indicate very few wildstock coho are harvested close to the hatchery, while catch rates on hatchery coho are relatively high.

**Proposal 177 does not direct ADFG to allow coho retention in particular areas, but asks ADFG to work with the hatcheries and troll stakeholders to develop areas that meet all conservation and allocation criteria and *could* be opened during general coho closures.** Thus, this proposal asks the Board of Fish to allow ADFG to adaptively look for opportunities instead of telling ADFG what to do. We are hopeful the Board agrees with us that adopting this proposal and creating opportunity for the troll fleet, while allowing ADFG to carefully consider all conservation issues before granting access to hatchery coho, is in the best interest of wildstock coho, ADFG, hatcheries and trollers.



- |      |   |                |
|------|---|----------------|
| 178  | <b>Restrict fishing area in Sitka Sound when harvest of non-Alaska hatchery-produced king salmon reaches 30,000 fish by March 1.</b>                  | <b>Oppose</b>  |
| <br> |   |                |
| 179  | <b>Adopt measures to reduce harvest rate in the winter commercial salmon troll fishery during times of high king salmon abundance.</b>                | <b>Oppose</b>  |
| <br> |   |                |
| 180  | <b>Reduce triggers in the Southeastern Alaska Area spring commercial salmon troll fishery by five percent in years of high king salmon abundance.</b> | <b>Support</b> |

Proposal 180 seeks to allow trollers to catch a few more of the enhanced salmon they are allocated, by lowering the percentage triggers in the spring troll fishery by 5% when abundance is high. This provision would only be implemented in years of high abundance, and would not disrupt the king salmon management plan or reallocate a substantial portion of the troll Chinook quota to the spring troll fishery. In years of high abundance, decreasing the percentage triggers by 5% would simply allow trollers to catch more Alaska hatchery Chinook.

This proposal is designed to keep spring troll fisheries open in years of exceptionally high Chinook abundance, which we have defined as an abundance index of 1.95 or higher, or some equivalent measurement of abundance (e.g. treaty quota of 337,000 or more). Southeast Chinook abundance reached this level in 2014 and 2015, when the Columbia River enjoyed the largest fall Chinook runs since the dams were erected in the 1930s.

From April through June many small areas are opened to trolling near hatcheries, or in corridors where Alaska hatchery fish are known to transit. The spring troll fishery is structured to target Alaska hatchery Chinook and all areas are held to Guideline Harvest Levels.

Since the goal of the spring fisheries is to catch Alaska hatchery fish, a set of triggers was established by the BOF, which define the minimum percentage of Alaska hatchery Chinook that must be harvested each week to keep the spring hatchery areas open to trolling. When a cap is reached, the area closes.

The massive abundance in 2014 and 2015, caused the winter fishery and many spring troll areas to be restricted or close prematurely. Many of the treaty fish that put us over the caps were mass marked hatchery salmon from the Columbia River, which count against the Chinook quota. This proposal would help alleviate the problem of fishery closure, and help ensure trollers have a full opportunity to catch enhanced Chinook salmon should a comparable situation arise in the future.

Under this proposal, the reduced triggers would only be implemented at extreme abundance levels and will have no impact on the fishery during years of mid-to-low abundance, (<1.95 or equivalent) when the existing triggers would be in place.

Reducing the percentage triggers by 5% in years of high abundance will allow trollers better access to hatchery Chinook and help alleviate the enhanced salmon allocation imbalance.

If implemented, most of the troll treaty allocation of Chinook would still be harvested in the summer troll fishery and the winter troll fishery would not be impacted in any way.



- |     |  |                |
|-----|--|----------------|
| 181 | <b>Reduce the percentage of remaining commercial king salmon troll fishery harvest taken during the initial summer king salmon retention period from 70% to 60% during years of high king salmon abundance.</b>  | <b>Oppose</b>  |
| 182 |  |                |
|     | <b>Establish a starting date for the reopening the summer commercial king salmon troll fishery.</b>  | <b>Oppose</b>  |
|     | This proposal ties ADFG's hands too much - they need to be responsive to timing of the resource in relation to management goals of conservation and moving coho to inside fisheries.   |                |
| 183 |  |                |
|     | <b>Modify commercial salmon fishing closed waters adjacent to the Situk River.</b>   | <b>Support</b> |
|     | This proposal would move the Eastern boundary two miles West, to compensate for the ever-changing Situk River mouth. An oversight during the 2012 Board of Fish cycle meant that only the Western boundary was changed, which reduced the amount of area open to trolling. The changed boundary is needed to protect troll access to the area. |                |
| 184 |  |                |
|     | <b>Modify gear specifications for the commercial salmon hand troll fishery.</b>  | <b>Support</b> |
| 185 |  |                |
|     | <b>Increase opportunity to harvest salmon and allow additional gear types in the Southeastern Alaska Area personal use salmon fishery.</b>   | <b>Oppose</b>  |
| 186 |  |                |
|     | <b>Define what constitutes a 'guest' of a lodge, charter vessel, or other enterprise.</b>  | <b>Support</b> |



**Alaska Trollers Association**  
**Recommendations on Southeast Chinook Stocks of Concern Action Plans**  
**December 28, 2017**

ATA offers the following recommendations on the Chinook stocks of concern action plans. The timing of the listing and release of the plans has made it difficult for our association to craft a more complete response by deadline. It is likely we will add to the record as this matter proceeds. We look forward to further communications with the Board of Fisheries and ADFG before and during your January deliberations.

**UNUK RIVER ACTION PLAN:** SUPPORT Option B with modifications below.

**CHILKAT/KING SALMON RIVERS ACTION PLAN:** SUPPORT Option B with modifications below.

**TROLL FISHERY**

*Winter*

Conduct the winter fishery October 11 to March 31, under the terms of the existing management plan.

*Spring*

1. May and June: open spring sub-districts that typically have a low presence of Unuk, Chilkat, and King Salmon rivers wild Chinook.
2. Provide expanded areas for spring troll hatchery harvest directly outside and near the THAs, where practicable.
3. Ensure that all available chum fishing opportunities be made available to the troll fleet.

*Summer*

1. Open the summer Chinook fishery July 1, under the terms of the existing management plan.
2. Leave THAs and all spring access and chum areas open until the general king salmon opening,
3. Ensure that all available chum fishing opportunities be made available to the troll fleet.
4. Provide opportunities for trollers to harvest hatchery coho during the August coho closure.



### **Delisting Criteria**

- Set reasonable goals for delisting and attempt to get the fleets back to regular fishing regimes as soon as possible.
- Provide ADFG the flexibility to reduce restrictions as the stocks recover.

### **Additional Points**

- Keep Action Plan management separate - do not permanently modify the existing fishery management plans.
- Use ADFG Emergency Order authority to implement the action plans.
- Implement fisheries regulations and action plans in a way that minimizes disruption and maximizes economic opportunity, while also paying heed to conservation and rebuilding stocks of concern.
- ATA opposes the use of a Mark Select Troll Fishery.



Submitted By  
Allen Pool  
Submitted On  
12/19/2017 11:39:53 AM  
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C. Allen Pool

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831-372-5564

December 17, 2017 I'm in opposition to proposal 165. For the reason(s) stated in this letter.

November 1, 2008

To Whom It May Concern:

With the exception of one year, I have, since 1998, had the pleasure of fishing on the Tsiu River as a guest at the camp of the Alaskan Wilderness Outfitters Company in either August or September. Each trip was unique. The setting is beautiful beyond words as has been the abundant supply of incoming Silver salmon.

Only one feature has prevented the experience from being perfect. That has been the bad manners, rudeness, and illegal activities of some of the commercial fishermen. Each time that I have fished on the river at the same time as the commercial fishermen, some of them, not all, have used their boats to interrupt me and others while we were fishing a school of fish. They would run and circle their boats between us and the school of fish so as to herd the school into their nets. Many times, they have done so without regard for our fishing and our safety.

At the times I and others have called out to them, they expressed their rudeness by saying such things as "I'm just making a living", "This is my income", or "F..... you". This past September a woman was fishing about 15 yards to my left. There was a school of fish between her and the opposite bank. A commercial fisherman raced between her and fish and commenced circling in front of her and herding the fish to his net. In doing so, he came dangerously close to her. When she called out to him, he respond holding up to her his middle finger.

I don't begrudge the commercial fishermen their right to fish or to make a living. However, they should do without infringing upon the rights of others and without violating the law. Greater enforcement of the fishing regulations is needed. Without vigors enforcement, those commercial fishermen who have behaved badly and have violated the law will continue to behave badly and violate the law.

Respectfully,

C. Allen Pool





**ANB/ANS Grand Camp**  
Portland, OR    October 2017



**Resolution #17-01**

**Title: Restoring Subsistence Priority for Herring**

WHEREAS, Pacific herring are considered an ecological keystone species for the role they play in transferring energy for primary and secondary producers to upper trophic level species, and

WHEREAS, Pacific herring have been utilized by Alaska Natives since time immemorial and are considered an ecological keystone species, and

WHEREAS, subsistence herring egg harvest surveys conducted by the Alaska Department of Fish and Game's Division of Subsistence (DoS) that in the last eight years subsistence needs have been met less than 50% of the time, and

WHEREAS, the results of the DoS subsistence herring egg harvester surveys show that the State of Alaska has failed to provide adequate opportunity for subsistence harvesters to meet their needs, and

WHEREAS, twice in the last 6 years the State of Alaska has grossly overestimated the spawning biomass of the Sitka Sound herring stock resulting in a flawed guideline harvest level and put the future of the stock and the ability of subsistence harvesters to meet their needs at risk.

NOW THEREFORE BE IT RESOLVED, that the ANB/ANS strongly support 2017-2018 Board of Fish proposals 98, 99, 105, and 106, and strongly recommend that the Board of Fish do pass these, and

BE IT FURTHER RESOLVED THAT the ANB/ANS vehemently opposes 2017-2018 Board of Fish proposals 94 and 104 and recommends the BoF eliminate these proposals

BE IT FINALLY RESOLVED, that the ANB/ANS strongly supports 2017-2018 Board of Fish proposals 98, 99, 105 and 106 and recommends the BoF adopt these proposals.

/s/ Sasha Soboleff, Grand President  
Alaska Native Brotherhood

/s/ Cecilia Tavoleiro, Grand President  
Alaska Native Sisterhood

/s/ Devlin Anderstrom, Grand Secretary  
Alaska Native Brotherhood

/s/ Carol Duis, Grand Secretary  
Alaska Native Sisterhood





Submitted By  
Ben Hinde  
Submitted On  
12/19/2017 4:52:30 PM  
Affiliation

Proposal #235

I support proposal #235. I agree with a size, sex and fixed season approach. Keep the fishery simple and fisherman fishing.

Submitted By  
Ben Hinde  
Submitted On  
12/19/2017 4:45:30 PM  
Affiliation

Proposal #54 Dungeness pot reduction

I oppose proposal #54. As a person that has owned a 75, 150 and now a 225 card, I dont believe decreasing pot numbers is a good direction to take the fishery.



Submitted By  
Benjamin Atwood  
Submitted On  
12/26/2017 2:07:35 PM  
Affiliation

Phone  
907-617-5718

Email  
[blondebenjo1983@hotmail.com](mailto:blondebenjo1983@hotmail.com)

Address  
Box 583  
Ward Cove, Alaska 99928

My name is Ben Atwood. I am a Commercial Salmon Troller and I reside in Ketchikan. I support proposal 183 and oppose proposal 148.

Proposal 148. This proposal is aimed to expand the Herring Bay terminal harvest area directly into the Unuk River Chinook corridor. This proposal also would remove the Non-resident annual sport limit for Chinook caught within this area. I believe that the issues with Unuk River Chinook returns are far too concerning to consider this proposal at this time.

Proposal 183(Modify commercial salmon fishing closed waters adjacent to the Situk River) Originally the department added a small area directly outside the Situk River to ensure that enough Coho made it into the river to support the multitude of in-river fisheries that take place on this system. In 2012 the department modified the western boundary of this area, moving it approximately 2 miles westerly to keep up with the ever changing Situk River mouth. Incidentally that proposal didn't just move the closed area, but expanded it due to the eastern boundary not following suit with the change of the river mouth. I believe this proposal will correct this error, while still leaving the same size closed area in front of the Situk River to ensure the Coho run continues to remain strong with plenty of fish for the in-river sport and net fisheries.

Sincerely, Ben Atwood



Submitted By  
Bethany S Goodrich  
Submitted On  
12/26/2017 10:09:49 AM  
Affiliation  
Ms.

Sitka is a glorious place and locals know, herring season is one of the most spectacular times of year for our coastal community. The animals return, the sunshine lengthens and the sound foams turquoise. I have been following the herring subsistence harvest intently for three years on the water traveling throughout Sitka Sound with different subsistence users. All users I have met, from Sitka residents to visitors from Hoonah and Angoon, have concerns about a more unpredictable, less consistent and more scarce herring egg harvest. Herring are the critical base of our ecosystem. The natural resources of which our economies depend on, such as salmon, rely too on these forage fish. Additionally, our quality of life rests heavily on the backs of these shiny little creatures. As a resident of Sitka who intends to build my life here, I want to voice my support for Proposal 98 to reduce the harvest level and support a more ecosystem based approach to herring harvest in Sitka Sound. I also support adopting the more conservative Southeast regional model for the commercial industry and in general, all efforts to leave more herring in the water.



October 1, 2017

Alaska Board of Fisheries,

My name is Bill Menish and I have been a Sitka Sound sac roe permit holder and participant since before limited entry. I also am a permit holder in the Northern closed pound fishery and participated in that fishery for 8 years until it was shut down for lack of herring. In that fishery, I believe we, as fisherman, are responsible for the demise of the Northern closed pound fishery.

I am in full support of Proposal EF-F-17-06 to allow open pounding in the Sitka sac roe fishery as an alternative to seining. The open pounding has proven to work well in the past experimental fishery in 1998-1999 in Sitka Sound which I was involved in. It is truly a green fishery with no dead loss unlike closed pounding where I have seen a lot of dead loss. You cannot keep stuffing more and more herring into a small enclosure and not have major fatalities.

This proposal gives fisherman a chance to increase the value of the fishery and more herring would swim off, helping the biomass remain strong.

I urge the Board to act on this proposal to help maintain a healthy biomass. Killing less herring and yet increasing the value of the fishery is a very positive thing. Open pounding will achieve this.

Thank you.

Bill Menish



Submitted By  
Blake LaPerriere  
Submitted On  
12/23/2017 2:38:01 PM  
Affiliation

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Email  
[dinghydude@gmail.com](mailto:dinghydude@gmail.com)  
Address  
2212 sawmill creek road  
sitka, Alaska 99835

Dear Board of Fisheries members,

I'm fifteen years old and I've lived on the water here in Sitka all my life. Just in my short lifetime, I have seen major changes in the Sitka Sound herring population.

When I was five or six, I remember netting herring out of the water right off of our beach. I remember whole seine fisheries that happened in our bay. I loved seeing the herring spawn. I loved seeing the thousands of gulls come in from the ocean and sea lions all over our bay. The whales would come in, and for a few days or weeks, our bay would seem to become the center of sea life.

This has changed. A lot. I don't remember what year it was that we had some decent spawn in our bay, but it has been at least five or six years since there was anything noticeable. When herring time comes each year it makes me sad. I really miss the herring and all the life they would bring with them.

As far as I am concerned this rapid decline in herring is from overfishing. The Tlingit managed this fishery for thousands of years and they did it sustainably. So can we.

Up and down the Pacific coast countless fisheries have been ruined by poor management and I am not ready to see the herring disappear. We have the last intact herring fishery here in Sitka and I'm not ready for the hearing to become like all the other dead Pacific fisheries.

I support proposal 99, but to tell the truth, I would like to see the herring sac-row fishery entirely closed.

Thank you,

Blake LaPerriere.



Submitted By  
Blossom J. Twitchell  
Submitted On  
12/14/2017 8:54:12 AM  
Affiliation

Phone  
9077389671

Email  
[twitchellblossom@gmail.com](mailto:twitchellblossom@gmail.com)

Address  
715 Sawmill Creek RD  
SITKA, Alaska 99835

My name is Blossom Twitchell, I have lived in Sitka for over twenty years. As a young Mt. Edgecumbe High School student, we would always anticipate the herring season. It meant being able to enjoy the community happenings while also enjoying the local subsistence harvest of the herring and its eggs. The herring season would be marked every year by the local sight of the waters being changed a milky white/green. As the years past, these areas grew smaller and smaller until they no longer showed up at the local beaches. Now, my children as well as other AK Native children do not have the memory of seeing the ocean outside of Sitka turning a milky white/green. The only sign they have of the herring season is the small planes taking off. The Sitka Tribe of Alaska would provide in years past herring eggs to the elders of Sitka, this years harvest was so horrible, there wasn't hardly enough to do such a thing and the quality of the eggs was a disgrace. The herring season has been changed, our subsistence way of life and community has changed. Our children will not have the memories that we hold, and that is within the last twenty years. I have had elders tell me how everything has changed, and they fear the herring is gone. They have memories of the whole coast erupting with herring. The current Mt. Edgecumbe Students no longer are able to send herring eggs home, which has disrupted the traditional trade of subsistence food between the Interior and the Coast.

The herring fishery needs to be protected so that we can ensure a traditional future for our children.



Submitted By  
BoLars Matson  
Submitted On  
12/26/2017 8:33:02 PM  
Affiliation

Sport fishing and commercial fishing can coexist on the Tsiu river. But certain safe guards need to be maintained. It is extremely difficult to sport fish below the marker during an opener, which makes it essential that the historic 1/2 mile closed to commercial fishing be maintained. Given stream dynamics there may not be holding water to fish within the proposed, reduced area above the marker.

Thank you for your consideration.





To Alaska Board Of Fisheries

From Brad Sobjack

FV. DETERMINED

South east Alaska Dungeness Fisherman

I Support proposal # 235 deleting the current  
management plan with a Fixed season date  
June 15th Thru Aug 15th Summer  
Oct 1 Thru Nov 30th winter

I do not Support Proposal # 54; SAAC 32.125  
to reduce From 300 to 240 Pots This is  
not a solution to the Sea Otter Problem  
This would be a hardship To Fisherman -

I do not Support proposal # 55  
Allowing up to 400 pots This seems silly

I do not support Proposal # 56  
Closing waters of Twelve mile arm  
to commercial Fishing for Dungeness - We have  
Lost enough ground already.  
Please consider my comments.  
Thank You Brad Sobjack



Submitted By  
Brian Zwick  
Submitted On  
12/27/2017 6:30:32 PM  
Affiliation  
Gillnet

Phone  
907-821-0586  
Email  
[Akdiver69@yahoo.com](mailto:Akdiver69@yahoo.com)

Address  
801 Peterson st.  
Ketchikan , Alaska 99901

I oppose proposition's 79 80 81 82 83 84 I feel they would create hardships for all involved in shrimp

As I also strongly oppose 153 148 140 145 if the seine gets Anita and naket it will totally take sways Gillnet income for many who only fish these areas and would be devastating to the SE Gillnet fleet.



Dear Alaska Board of Fisheries Members,

I'm submitting this comment now because the August 2017 Southeast Alaska Chinook salmon and non-pelagic rockfish closures occurred after the proposal deadline and I will be unable to comment in person at the January meeting.

For the reasons stated below, would you please consider for Alaska resident anglers, changing the harvest category from sport to personal use for Chinook salmon and rockfish. And in addition to this reclassification, for Alaska residents only, would you please consider a minimum Chinook daily bag limit of one fish regardless of the Abundance Index - with the flexibility to increase the daily bag limit as the abundance increases - and to end the rockfish closures.

This request for change is based on the fact there is no data to indicate the harvest by Alaska resident anglers has caused the decline, or is a significant reason for the decline, of Chinook salmon and non-pelagic rockfish populations. If Alaska fisheries management is based on science, then I see no reason to close these fisheries to Alaska residents. By changing the category to personal use, Alaskans would be able to continue fishing when the groups that harvest the vast majority of these species (non-resident charter anglers and the commercial fishing fleet) is limited due to conservation concerns.

The personal use designation would allow Alaskans to harvest small numbers Chinook salmon and rockfish when the populations can't sustain heavy harvests by the other groups, and it is currently used to prevent non-residents from harvesting king crab.

Thanks for your consideration,

Bruce White  
Sitka, Alaska



Submitted By  
Cale LaDuke  
Submitted On  
12/28/2017 11:54:48 PM  
Affiliation  
FV Sammi  
  
Phone  
9077388000  
Email  
[caleladuke@gmail.com](mailto:caleladuke@gmail.com)  
Address  
PO 1216  
Sitka, Alaska 99835

I am a commercial fisherman of halibut, blackcod, and multiple species of salmon, with 20 years of fishing experience in Alaska, and I am concerned for our resources. I would like to ask the Board of Fish to make the most conservative allocations possible in their herring decisions, due to my concerns that herring are close to the foundation of the food chain. King salmon and halibut, among other species which eat herring, have been in decline. There is a theory called the basin effect (where high catch rates can continue right up till species collapse, because the best habitat continues to experience high biomass as fish from peripheral areas replace fish removed by the fishery, until there are none left), that may be happening now. As stewards of natural resources, it is in our best interest to leave more forage fish in the water.

Thanks,

Cale LaDuke



Caven Pfeiffer  
Commercial Troller  
236 Observatory Street  
Sitka, Ak  
907-518-1945

Dear Members of the Board of Fish,

This letter is in regards to the Unuk River and Chilkat River action plans for 2018. I am in my tenth season as a commercial troller and I am the primary bread winner for my family. For the sake of our southeast Alaskan communities, record low escapements on the Chilkat, King Salmon and Unuk Rivers must be remedied.

The Department of Fish and Game has produced action plans that are very broad based and not specific to the individual stocks of concern.

For example:

- Closing the entire southeast winter troll fishery a month and a half early.
- Reducing the Spring Troll Fishery to THAs, waters in close proximity to hatchery facilities or release sites.
- A region-wide troll closure May 29- June 14.

Please allow fishermen to fish where stocks of concern are not abundant.

To achieve this:

- Concentrate closures in the times/areas where stocks of concern comprise the highest percentage of the catch and to increase fishing effort in times/areas where they make up the lowest percentage of the catch.
- The BoF should set a maximum allowable Harvest Rate for each gear group.
- Use data from previous years to tailor the next year's management.

I have considered the proposed loss of fishing time under the department's action plans:

- Averaging the past three years, I have grossed \$82,000 during the winter, spring and summer troll fishies combined.
- From April 1 to July 1, I have made \$19,500 which is 24 percent of my gross.
- Broad based closures during the winter and spring would end the profitability of my fishing business.

Thank you for considering my concerns and recommendations.



Sincerely,  
Caven Pfeiffer



Submitted By  
Chandler O'Connell  
Submitted On  
12/28/2017 7:57:13 PM  
Affiliation

Phone  
9077380357  
Email  
[cmoconn@gmail.com](mailto:cmoconn@gmail.com)  
Address  
608 Etolin Street  
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I am writing to express my support for Proposal 98 and Proposal 99, either of which would cap the harvest of herring at a maximum exploitation rate of 10 percent. I would be happy to see the Board of Fisheries institute whichever of these two proposals you deem most appropriate.

I am a born and raised Sitkan and a member of a fishing family. I remember as a child going to collect herring egg covered seaweed, layered knee deep on the beaches along Sitka's road system, to use in the garden. Its been years and years since I've seen spawn like that in town. Over those years, I've also heard more and more from Sitka's elders about how the herring and the spawn are different than they used to be.

I am deeply concerned about the health of the ecosystem, the resiliency of my community, the rights of tlingit peoples to maintain their cultural practices and resources, and the future of subsistence and commercial fisheries. My concerns are further compounded by the rapidly changing ocean and climate conditions that are clear to see (ocean acidification, changing temperatures, algae blooms, the sudden appearance of Market Squid), but with implications that are hard to understand.

The herring population in Sitka Sound lies at the crux of all of these concerns. As a forage fish at the bottom of the food chain, I imagine herring as the foundation of the "Jenga Game" that is our ecosystem and multi-layered economy, including subsistence, commercial fisheries and tourism. Its a complicated system experiencing pressure from human exploitation, habitat disruption, and climate change. If herring gets knocked out, everything else will tumble down too. Fish, marine mammals, birds; they're all dependent on the herring.

According to Traditional Ecological Knowledge, the current Sitka Sound herring population is well below historical baselines, prior to reduction fisheries. At the Sitka ADF&G Local Advisory Committee meetings considering herring proposals this year, there was strong public outcry for more conservation and sincere concerns expressed about the health of the herring population. ADF&G's forecast estimate for the 2018 herring biomass is 55,637 tons, a number considerably smaller than last year. In 2017, the ADF&G model estimates that only 63,270 tons of the forecasted 73,245 tons showed up on the spawning grounds. If that percentage difference occurs again in 2018, only 48,060 tons would return. It is also notable that the 2018 herring biomass estimate is comprised of 47% age-4 fish, which are typically smaller than the fish size desired by the sac roe industry. Taken together, these points lead me to believe that Sitka's herring are vulnerable and potentially at risk.

All of this should e considered in the context that Alaska's other herring fisheries have already been closed and that herring stocks in regions have collapsed. The Sitka Sound herring population is an anomaly that should be treasured.

Given the unique and irreplaceable role that herring play as a keystone species, I believe that greater caution is called for in the management of the sac roe herring fishery. There is precedent for the Board of Fisheries to vote for conservation in this matter. Various ADF&G fisheries in Southeast Alaska, such as sablefish, lingcod and rockfish, utilize conservative harvest rates because they are potentially vulnerable. Other herring fisheries on the west coast currently use a maximum harvest rate of 10%. Action should be taken to conserve this valuable resource before it's too late.

For the ecological, cultural and long-term economic wellbeing of Sitka, I ask that the Board of Fisheries support Proposal 98 or Proposal 99.

Thank you for taking the time to consider my comments.

Sincerely,

Chandler O'Connell





Submitted By  
Chandler O'Connell  
Submitted On  
12/28/2017 11:32:55 PM  
Affiliation

Phone  
9077380357  
Email  
[cmoconn@gmail.com](mailto:cmoconn@gmail.com)  
Address  
608 Etolin Street  
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I am writing to express my opposition to Proposal 104, which would repeal the closed waters in the District 13 commercial herring fishery around Middle Island. This area is heavily used by subsistence harvesters in Sitka and is a protected area that I believe has worked well since its establishment by the Board of Fisheries in 2012.

I am deeply invested in the state of Sitka's natural resources. As a member of a commercial fishing family, I have been lucky to benefit from the bountiful waters of Southeast Alaska and to have had the opportunity to learn about fisheries management. I believe that management should prioritize the health of the ecosystem, cultural uses, subsistence uses and commercial uses, in that order. Over the past 10 years, the minimum amount of herring spawn reasonably necessary for subsistence has not been met multiple times. In addition, many members of the Tlingit community have been speaking out for decades against overfishing of herring (based on Traditional Ecological Knowledge) and have called for conservation in order to sustain their culture and the ecosystem on which we all depend. Given this, and given my belief that herring are increasingly vulnerable due to climate change, shifts in predation, habitat pressures, and extraction by the sac roe fishery, I support maintaining or expanding protections that allow for successful subsistence harvesting.

I believe that Proposal 104 would hurt subsistence users and could have unintended negative consequences on the health of the herring population overall, by rolling back conservation measures (maintaining an area with less disruption of spawning activities seems like a positive move for conservation!). Please vote no on Proposal 104.

Sincerely,

Chandler O'Connell



Submitted By  
Chandler O'Connell  
Submitted On  
12/28/2017 11:40:42 PM  
Affiliation

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[cmoconn@gmail.com](mailto:cmoconn@gmail.com)  
Address  
608 Etolin Street  
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I am writing to express my support for Proposals 105 & 106.

I am concerned about the health of herring stocks in Sitka Sound, and I have heard compelling commentary from a diverse cross section of Sitka's subsistence harvesters that it has been challenging to meet the need for herring eggs in recent years, despite putting more effort into subsistence activities. Therefore, I am in support of efforts to improve subsistence outcomes and conserve the adult herring population.

Thank you for taking the time to consider this comment.

Best,

Chandler



Submitted By  
Chandler O'Connell  
Submitted On  
12/28/2017 6:46:20 PM  
Affiliation

Phone  
9077380357  
Email  
[cmoconn@gmail.com](mailto:cmoconn@gmail.com)  
Address  
608 Etolin Street  
Sitka, Alaska 99835

Dear Members of the Alaska Board of Fisheries,

I'm writing to express my strong opposition to Proposal 94, which would reduce the amount of herring spawn reasonably necessary for subsistence in Sitka Sound to 60,000 pounds. This proposal is based on faulty assumptions and disregards the critical importance of the subsistence herring egg harvest to the Tlingit culture, the food system and the economy (food is money), in Sitka and across the state.

The Southeast Herring Conservation Alliance (SHCA) bases their proposal on ADF&G Subsistence Division information showing decreased participation in herring egg branch harvest. However, that participation data is based on the number of harvesters, and not the number of trees set, arguably a more appropriate measure of effort. For instance, in recent years, much of the subsistence herring harvest in Sitka Sound has been conducted by "super harvesters" (versus many small scale harvesters) who set many trees, and utilize the entire opening to try and meet the subsistence needs of the community. It's also worth noting that, according to public testimony by Jeff Feldpausch, the Natural Resource Director for the Sitka Tribe of Alaska (STA), in 2017 STA exerted more effort (time, fuel, trees set) to harvest herring spawn than ever before, but was still unable to meet their needs.

In addition, SHCA bases their proposal on the claim that "the SHCA egg harvest program has demonstrated that a harvest of 30,000 to 40,000 pounds saturates the gifting of eggs in Sitka. Additional eggs are certainly harvested by individuals, whom we have also monitored, but there is insufficient effort to harvest more than 50,000 pounds." SHCA is not a monitoring agency, it is a nonprofit that works for the benefit of southeast Alaska sac roe herring seine permit holders. I don't believe that this claim is supported by evidence. Indeed, at the Sitka's Local ADF&G Advisory Committee meeting on herring proposals, I heard many compelling public testimonies on the challenges subsistence harvesters are facing in meeting their needs, that directly contradict SHCA's supposition.

I trust that the Board of Fish will respect the important role of the subsistence herring egg harvest in Sitka's cultural and nutritional way of life, and will vote against Proposal 94.

Thank you for considering this comment.

Sincerely,

Chandler O'Connell



Submitted By  
Charles Allen Pool  
Submitted On  
12/27/2017 1:22:19 PM  
Affiliation

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831-212-0452  
Email  
[allenpool@comcast.net](mailto:allenpool@comcast.net)

Address  
273 San Bernabe Drive  
Monterey, California 9390-6123

Dear Sir/Madam:

Over the years, I made 14 trips to fish the Tsiu River. It was always a delight and great fun. On several of those trips, I shared the river with commercial fishermen. That was OK, I understood their need to make a living. However, some of them, many, were outright rude and dangerous showing no concern for life or limb of other persons as they deliberately raced their boats between sport fishermen and schools of fish in their efforts to herd schools of fish into their nets.

There was and always will be a need for reasonable regulations and enforcement of the regulations enacted for the mutual benefit of commercial and sport fishermen. I urge you to consider this in your coming deliberations of future regulations relative to both commercial and sport fishing fishing on the Tsiu River.

Respectfully,

C. Allen Pool



Submitted By  
Charles D Schroth  
Submitted On  
12/28/2017 1:48:47 PM  
Affiliation  
Southeast Aerial Survey, LLC

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9079571858  
Email  
[chuck.schroth@gmail.com](mailto:chuck.schroth@gmail.com)  
Address  
PO BOX 193  
Gustavus, Alaska 99826

Thank you for the opportunity to comment on proposal 159, proposed by John M. Johanson. My name is Charles Schroth. I have been a resident of Southeast Alaska since 1970. I have been a commercial pilot in Southeast Alaska for nearly 20 years, and involved in Alaskas Southeastern fisheries (directly and indirectly) most of my adult life. For the past 5 years I have been a fish spotter for a fleet of seiners that sell their fish solely to Ocean Beauty Seafoods, LLC, a large company that has mutple commercial fleets and multiple commercial processing plants in both Alaska and Washington State.

I am in agreement with the current regulation 5AAC33.398 that states **"In the Southeastern Alaska Area, during an open commercial salmon fishing period, a person may not use an [UNMANNED] aircraft to locate salmon for the commercial taking of salmon or to direct commercial fishing operations."** These unmanned types of aircraft are typically operated by untrained personnel and have proven to ba a hazard to aircraft. They do not have to follow the same training, licencing, and FAA regualtions that manned aircraft are required to follow.

I am in disagreement of proposal 159 to **"Prohibit the use of *all* aircraft used to locate salmon or direct commercial fishing operations during open commercial salmon fishing periods in the Southeastern Alaska Area."**

The use of manned aircraft is of great benefit to the fisheries in Southeast Alaska, and has been for nearly 100 years. The use of the airplane has a historical precedent in Alaska. Manned aircraft have been used to support fisheries in Southeast Alaska from patrolling fishtraps to supplying boats and canneries, as well as fish spotting.

As a fish spotter, it is highly beneficial to survey all areas surrounding the open areas to get a better understanding about the availability of the fish, the run strength, and direction of travel. This information is passed onto the Ocean Beauty Seafoods management and the fishermen. This knowledge allows them to make better decisions and to seek out more heavily populated fishing areas that are open. This reduces their overall costs and improves communications, safety and efficiency in the fleet.

The fishpotting community in Southeast, although small in numbers, is a very proffessional group dedicated to the legal harvesting of salmon. I have not witnessed any group of fishermen in the cowboy setting of using jetski's to "herd the fish" as stated in this proposal during any opening. I believe the enforcement department of the fisheries is effective and adequate. I personally have never witnessed or taken part in any illegal activities.

I believe there can be another way to manage the perceived problem stated in the proposal. If such activities are indeed happening, banning the use of aircraft would not prevent the illegal use of jetski's as stated.

Charles D Schroth

Southeast Aerial Survey, LLC



Charles P. Fogle

F/V invincible

F/V Incentive

5722 Campbell lake road

Anacortes WA. 98221

Alaska Board Of Fisheries  
PO Box 115526  
Juneau, AK. 99811

RE: Comments on Herring proposals for SE Finfish Meeting Jan. 11- Jan 22 2018

Mr. Chairman and Board Members,

I am writing to express my strong Opposition to proposals 95, 96, 98, 99, 100, 105, and 106. I would like to strongly support Proposals 94 and 104.

I have been participating in the Sitka Sac Row fishery for 18 years as a seiner and also having my tender participate every year as well. This fishery is a huge part of my yearly income and would be devastating to my family and crews if there were any unnecessary changes. Sitka is a proven long term sustainable fishery and has proven to support the commercial and the subsistence fisheries as well as the natural competitors for the fish. The Fishery supports the community, state and Alaskan families as well as nonresident families as well.

There is absolutely no scientific support or any other reason to support proposals 95, 96, 98, 99, 100, 105, and 106. These proposals are all presented by the STA and have no support by the dept. of F & G or any other scientific organization that they use to manage the health of the long standing strength of the Sitka sound Herring fishery.

Proposals 94 are a request to change the ANS to actual documented need that has been harvested. Please support this proposal.

Proposal 104 is a request to give the dept. a tool that is needed at times to harvest the quota. The Core Area established in 2012 is not necessary for the subsistence harvest of eggs as shown by the Southeast Herring Conservation Alliance information. However on rare occasions the area closure has limited the Dept. to manage for maximum sustainable yield. It is unnecessary to have the closed water area established in 2012.

Thank you for your time on this matter

Charles P. Fogle  
907-230-7977



***Charles W. Treinen***  
*2054 Arlington Drive*  
*Anchorage, Alaska 99517*  
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December 26, 2017

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526  
<http://www.boards.adfg.state.ak.us/>

**RE: Comments on herring proposals for SE Finfish Meeting--Jan. 11-Jan. 22, 2018**

Mr. Chairman and Board Members,

I am writing to express my:

**Opposition** to proposals 95, 96, 98, 99, 100, 105, and 106

**Support** for proposals 94 and 104.

As a Southeast Alaska sac roe seine permit holder for over twenty years, I have made large investments in the Sitka Sound sac roe fishery. It is a significant part of my fishing business operations that provides income for me, my family and crew as well as for tenders, related businesses, processing and transportation that helps support Sitka, other SE fishing communities and the State. I also have sac roe seine permits for Prince William Sound, Kodiak, and Cook Inlet and participate in the open-to-entry Togiak fishery.

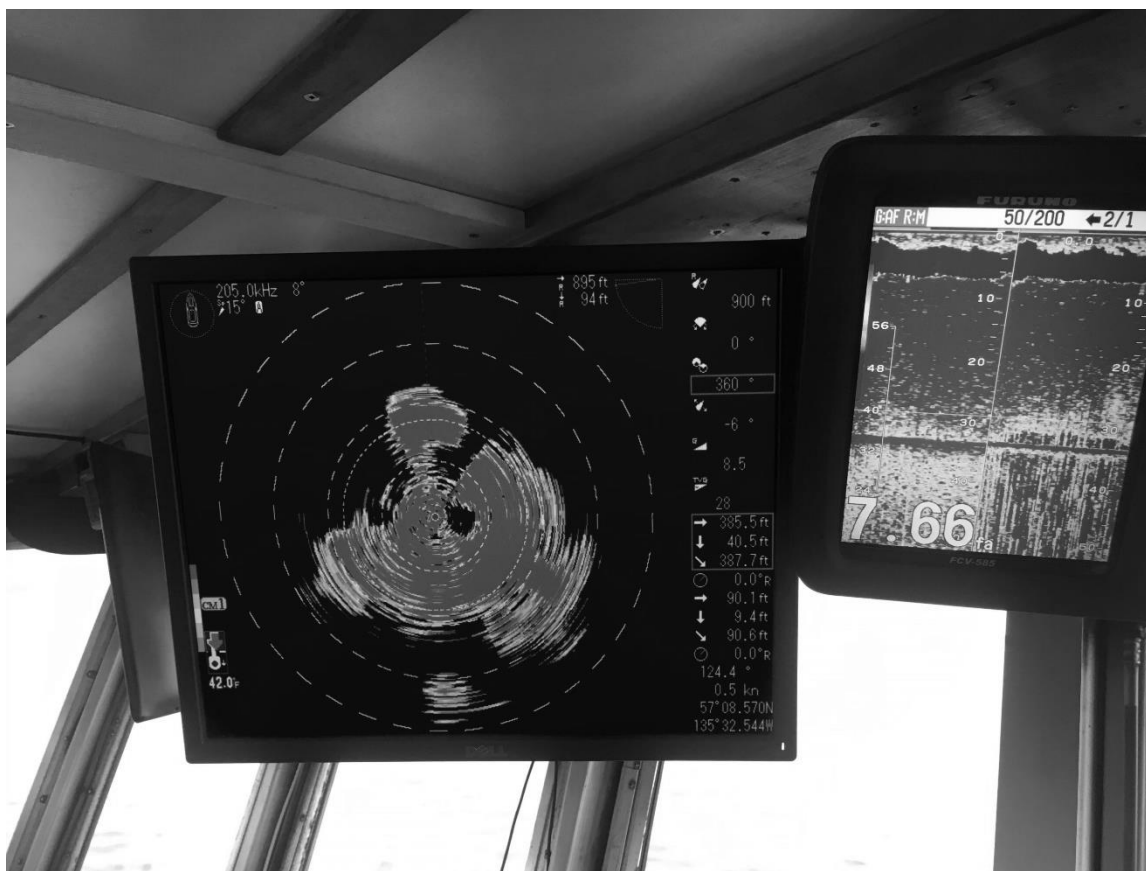
Long-term closures of PWS and Cook Inlet, along with Lynn Canal and West Behm Canal here in Southeast Alaska are a testament to the fact that all of Alaska's herring fisheries are conservatively managed and that when stocks are deemed insufficiently abundant, no commercial fishery is allowed. When stocks decline or increase as they so often do for unknown reasons, the commercial fishery is adjusted to reflect abundance in a very conservative and precautionary way. The Sitka sac roe fishery is clearly the most intensively managed herring fishery in the state and has a tried and true management plan with ample protections based on valid management science and stock assessment data. However, due to misunderstanding and political pressures, the fishery has been subject to misrepresentation and has often been unnecessarily restricted.

Herring seining in general requires specialized electronics, equipment and organization to be successful. In Sitka Sound, sophisticated electronics and coordinated efforts of the fleet and Department are especially important in determining the size and



characteristics of the herring biomass. Aerial surveys and other visual observations can provide some information but hydro acoustic detection of herring schools in Sitka Sound is critical because of relatively deeper water and the fact that the herring spawn typically occurs just after a plankton bloom that hampers visibility. It is unlikely that any of the local critics of the fishery have the equipment, organization, finances or incentive to make accurate judgements about the herring stock size or management in Sitka Sound. Nonetheless, every board of Fish cycle year, the same type of proposals designed to compromise the fishery are seen without any valid new information supporting those contentions.

The following print shows a sonar and sounder photo taken just prior to one of last year's openings and shows a massive school of herring that takes up a good portion of a 360-degree sweep of a 900-foot radius scanning sonar screen. The sounder shows solid fish from 7.66 fathoms to near the bottom at 35 fathoms. A 200 fathom (1200') long seine set in a circle outward from the center of the sonar picture could not reach the edge of this school.



This school alone probably could have filled the entire 2017 GHF of nearly 14 thousand tons if it even could have been caught! Without a fleet of herring seiners, the Department's aerial and hydro-acoustic surveys, the extent of this biomass and other



schools of herring would have been unseen. Significantly, the area where that picture was taken was not included by the Department in the subsequent opening.

During my tenure in the fishery (this will be the sixth Board cycle meeting for me), one constant is the effort of the Sitka Tribe of Alaska (STA) and their associates to limit fishing area, time and harvest or eliminate the fishery altogether based on anecdotal information and emotional appeals that are inconsistent with scientifically valid methods, data, analysis and rational decision-making processes. STA also consistently denies the validity of Department information and rejects measures to accurately account for their own activities. Nonetheless, the Board has chosen to respond to STA concerns with various changes to the management plan such as raising the threshold, increasing the amount necessary for subsistence (ANS) and area closures. It seems to me that the issues of concern are at best only marginally related to proposals addressed by the board to the point and that nothing short of total elimination of the fishery will satisfy the complainants. However, even with no commercial fishery, it is unlikely that the subsistence harvest will reach the ANS goal given its artificially inflated amount and unless there is a greater level of participation and demand for the product. At the lower end of the present 136 thousand-pound ANS, each of the 9 thousand Sitka residents would have over 15 pounds for consumption. While a considerable amount may be exported and shipped to other communities around Alaska--at a considerable cost, it seems unrealistic to believe that there is a demand for such a large amount without a commercial incentive for harvesters.

**Please support Proposal 94—Change ANS to reflect actual harvest.**

The present ANS of 136 to 237 thousand pounds is based on numbers that are based on estimated weights derived from a self-administered STA survey and have been shown to be highly inaccurate. Nonetheless, under-achievement of ANS is used as a justification for restricting the commercial fishery by STA. The Southeast Herring Conservation Alliance (SHCA) harvest data indicates that a 60 to 120 thousand-pound ANS would be more than adequate to cover local demand and would allow for 6.75 pounds per Sitka resident at the minimum. If more is needed, eat away! The high end is essentially meaningless since there is no real limit on the harvest outside of the effort it takes to set branches in an area where herring are spawning and to gather the branches with eggs later. The SHCA subsistence harvest program has shown that the demand for eggs appears to be saturated at less than the proposed 60 thousand-pound lower end ANS. Given this year's estimated 55,637-ton mature biomass and a conservative estimate of 10% roe, a 30-ton subsistence harvest that includes the weight of branches represents less than half a percent of the overall spawn.

**Please reject Proposals 95 and 96—Closure of 15-B, C and 11-A**

The proposer suggests that the areas noted should be closed to commercial fishing because they have been closed to commercial fishing since 1982. It does not appear that there is any identifiable problem being addressed. The Department closed the fisheries in



question due to a decline in stocks and has the tools to do so again if stocks rebound and subsequently decline again.

**Please reject Proposal 98—Lower harvest rate to 10%**

The proposer suggests that reducing the harvest rate is needed in “the rapidly changing ecosystem...” to provide for a “robust herring population and sustainable commercial fishery”. Since it is not clear what the affects of a rapid ecosystem change might be, it is not clear what need there is to change a responsive management plan that has a proven record of sustaining the herring stock at a level that allows for a commercial fishery, subsistence harvest and supports the growing marine mammal population. Setting a precedent for altering management plans based on potential unknown ecologic changes would be a call for altering management plans for all species.

Herring can be an important prey species for other valuable commercial species at some point in a life cycle, but they are also competitors or predators at other stages. The herring population remains well above the established 25,000-ton threshold and has stayed above twice the threshold in all but one year since 2003 and above threshold since 1995 under the 10-20% exploitation rate. A maximum 20% exploitation rate is a well-accepted standard used in herring fishery management. While alarm over rapid environmental change is a valid concern, curtailing the fishery for fear of the unknown is not a reasonable response and compromises economic options for all.

From a market standpoint, a harvest rate that approaches 0% is unsustainable and unnecessarily reduces economic opportunity for all stakeholders, communities and the State.

**Please reject Proposal 99—Reduce the harvest rate to 10%**

This proposal by the Sitka Tribe of Alaska (STA) has been presented and subsequently rejected by previous Boards. Little or no new information has been presented in the proposal and while STA may believe the fishery is disrupting spawning patterns, no evidence has been presented other than the contrived argument about not meeting the over-inflated ANS. SHCA has demonstrated that subsistence needs can be met if the effort is made. The Department’s Subsistence Division has noted the declining subsistence harvest effort in the 2002-2010 Report 343.

Department data 1971 to present has shown that a harvest rate of up to 20% has maintained a herring stock above the 25,000-ton threshold for over 20 years. Realizing that stocks of pelagic schooling fish around the world are subject to wild population fluctuation due to environmental conditions, it is significant to note that, while the 20-year average Sitka Sound forecast biomass from 1978 to 1997 was 32.5 thousand tons, the recent twenty-year average from 1998 to 2017 was 66 thousand tons. Stock assessments from the Department clearly demonstrate that the present exploitation formula has allowed for long-term growth in the stock. This proposal unnecessarily



compromises economic and sustainable opportunity for no realistic or demonstrable benefit to the proposer.

**Please reject the Proposal 100**—Juneau area herring stocks, 11-A, 15-B&C.

Since these areas have been closed for 35 years--as recognized by the proposer, it seems unnecessary to take any action on this issue. The Department recognizes this stock as being subject to a conservative sliding scale harvest level with a 5,000-ton threshold. This stock is not historically like the Sitka stock and rightfully should be treated separately.

**Please support Proposal 104**—Repeal closed waters in District 13.

The 'Core Area' established in 2012 is not necessary for the subsistence harvest of eggs as shown by Southeast Herring Conservation Alliance (SHCA) information. However, on rare occasions the area closure has limited the ability of the Department to manage for maximum sustainable yield. Now that a 2015 Federal Subsistence Board has shut down federal waters around Makhnati Island--despite recommendations against by Office of Subsistence Management biologists and the State of Alaska--it is unnecessary to have the closed waters established by the Board of Fish in 2012.

**Please reject Proposals 105 and 106**—Expand closed areas in Sitka Sound

These proposals are the usual attempts of STA to restrict the commercial sac roe fishery with patently false justification. As previously noted and widely recognized, the overinflated ANS is being used to compromise the sac roe fleet for no benefit to subsistence users. Additional closures will not benefit subsistence harvesters for the same reasons that the Core Area closure of 2012 didn't increase the subsequent subsistence harvests. Due to declining effort and saturated demand, it is unlikely that any area restrictions in the sac roe harvest will affect the subsistence harvest.

**Please reject Proposal 107**—Establish a spawn on kelp fishery in Sections 13-A and B.

This proposal is an attempt to bring a new user group into the Sitka Sound herring fishery, namely the 110 permit holders in the Northern Southeast Roe on Kelp Pound fishery (L21A). While it may appear to be a way to more fully use the available stocks, the introduction of alternate gear will create conflicts. The proposal asks to be able to open a fishery in areas 13- A & B of Sitka Sound if there is a 1500-ton unharvested amount in the sac roe seine fishery.

Presumably, they are asking for a closed pound fishery which has the potential to compromise the Sitka Sound stock due to disease problems related to crowding fish into



pens. It is also problematic to conduct a pound fishery after the main spawning event has occurred. Presently, the L21A permit holders have other areas with an allocation, however, it seems that those areas are having difficulty maintaining fishable stocks under the roe on kelp management regime. This proposal would be difficult to enact and create future gear conflicts where there presently are none.

Sincerely,

Charles W 'Chip' Treinen



To: Board of Fish Members

From: Charlie Piercy

Bachelor of Science in Chemical Engineering 1976

Board Chairman of the Seafood Producers Cooperative

Past president of southern Southeast Regional Aquaculture  
Association

Residing at 17491 North Tongass Highway Ketchikan Alaska (West  
Behm Canal 60 Miles from the Unik River)

Phone any time 907-247-8242

Re: Unuk River King Salmon Stock Status and Action Plan, 2018.

Outlined below are 5 factors that need to be included in the Unik River action plan. Without the consideration of these factors, I believe that the Unik River system is either approaching or has reached the threshold in which recovery to its escapement goals is nearly impossible under today's current management practices.

Factor 1) The most important factor in the management of any production system is to have good data collection and to make real time corrections. From an engineering perspective, the management of Kings (large fish) returning to the Unik River estuary is similar to many of the control systems used in the industries of the world. The escapement goal of 1,800 to 3,600 large fish is the amount of Kings needed to arrive at the Unik River (the set point). To achieve this goal it is most important to have timely and accurate data. The Sport Fish Department of ADF&G is requiring the lodge and charter industry to make weekly landing reports. This data is not being used to manage the catch rate in season because, why? In order to control the flow of "King Salmon " to the Unik River to meet escapement goal, you must have good data collection on their movements and real-time in season management. This run peaks around statical week 23 or 24 depending on where Sunday falls on the annual calendar. 98% of the run occurs within 3 weeks on either side of this statical week.

From page 5 of the Unik River King Salmon Stock Status and Action Plan, 2018, it reads: "Harvest rates in the Ketchikan area sport fishery on the Unik



stock of king salmon were 1%, 6% and 0% in 2015, 2016 and 2017, respectively.” My conclusion from these numbers, especially the 0% in 2017, when no commercial troll fishery occurred during the Unik River migration period is one or more of the following:

A) Data Collection was poor to non existent.

B) There were no coded wire tags (CWT) to collect. This means that the CWT samples from at least 3 brood years was nonexistent by the time the Unik Kings migrated through the Ketchikan sport fishing area.

C) Sport fisherman and sport fishing technology has improved in the past seven years to the extent that they can selectively prevent CWTed Unik River stock from biting. Historically, from Deer Mountain Hatchery, there have been CWTs landed in the sport fishery. Deer Mountain Hatchery used Unik River Kings as brood stock, until it was unable to operate financially.

This quoted statement from the draft plan above, is real hard for me to understand or believe that professional managers and scientists would actually think this is good science, yet alone publish it.

A logical solution to this factor is to treat all user groups the same in regards to data collection, reporting, and control. Weekly electronic landing reports of all users should be required. This is already being done in the commercial fishing sectors. In today’s electronic age this is not too much to ask of any user. The follow up of good data collection is to actually use it in a timely manner. It is also a necessity for ADF&G to make this data easy accessible to the public in a timely manner. In season management is required to make escapement goal in times when conservation is necessary, but also in times of abundance to obtain the statehood goal of maximum sustained yield.

Factor 2) Southern Southeast Regional Aquaculture Association (SSRAA ) historically has released King Salmon in Neets Bay, approximately 40 Miles from the Unik River estuary. These annual releases currently produce around 15,000 returning adults, the actual number depends upon the survival of the individual year chases that combine, to make up the annual return. Why this factor needs considering is because these fish are reared from funds generated by taxes that are applied to the landings made by commercial Salmon fisherman (3% of ex-vessel value). The only contribution to the expenses in the rearing and release of King Salmon in SSRAA’s region in over 6 years has been the 3% enhancement tax. Historically a small amount of dollars were contributed by the





State of Alaska. This funding no longer exists: consequently SSRAA is under no obligation to produce King Salmon. In my opinion SSRAA will only continue to produce Kings as long as the economics make good business sense to the commercial fishermen. At SSRAA's December 2017 board meeting, the Board of Directors decided to move 58% (about 9,000 returning adults) of the Neets Bay release to other locations. Why this is important to the Unik River escapement is that in 2021 when the majority of this year's (2018 release) returns there will be a significant decrease in the availability of Kings Salmon in the corridors leading to the Unik River.

Factor 3) Using the current management practices of annual management of sport fishing (charter bookings and lodge reservations, which contribute over 90% of the sport landings,) it will be impossible to control the sport harvest. Due to the 3 year Board of Fish cycle, it is imperative that the booking issue be resolved. Last year we had over one million cruise vessel passengers arrive at the Ketchikan docks. The cruise vessel industry is still wanting to grow the number of visitors and has asked the Port of Ketchikan to accommodate larger vessels. What is uncommon knowledge outside of the Ketchikan area is that the majority of the charters are booked aboard the cruise vessel. This method of booking avoids the city of Ketchikan sales tax and also causes about 50% of the generated revenue from bookings to never see the business cycle in Alaska. Large industry is controlling the extraction of a public resource by a provision made by a previous Board of Fish that lets management cave to political will of big corporations. They are not taking any responsibility for the limited resource available to them, but are wanting to grow their own wealth on the back of existing users. This state of affairs reminds me of why the Territory of Alaska pursued statehood: that was to wrestle control over its Fisheries resource from the Federal Government, who were managing it for the will of big companies. The solution again is to have good data collection and real time management control. It is also past time to treat the charter and lodge industry for the commercial enterprise it is. It is unfair and unrealistic for these professional fishermen to hide behinds the local residents' skirts. The captains who operate the charter vessels also need to take ownership and stand up to the reality of the situation that they are operating under. The Board of Fish should facilitate the recognition of a separate user group and its regulation thereof.





Factor 4) The nonhuman predators. I read the other day in one of the trade magazines that one pod of adult killer whales eat 64,000 pounds of King Salmon in Puget Sound. This is equivalent to about 3000 large Kings . If this is only 15% of this is true, the two pods of killer whales now living in the Ketchikan area from mid May through July would eat up the entire run forecast of the Unik River. Don't forget that there are also Sea Lions and Seals that prefer to dine on Kings. In today's society there is no willingness for predator control. We as managers must insert this factor in the harvest equation. I have witnessed, in the 40 years that I have lived in the Ketchikan area, the growth of small release by SSRAA to where it is currently releasing enough Kings to produce an annual average return of 30,000 Kings. This growth of King Salmon has precipitated growth of at least two pods of killer whales. It has also facilitated the unregulated growth of an inflexible charter industry in the Ketchikan area.

Factor 5) There are four individual ADF&G managers that contributed to this report. Each has individual personalities and bios in regards to the management of King Salmon. Often when talking to one of the commercial fisheries managers it is difficult to extract from that manager what the sport fish manager position is or what conservation measures they are taking. There would be greater accountability if only one frontline ADF&G manager managed King Salmon (i.e. a species manager). It is also an issue of fairness and the perception thereof. One person who would know all things "King Salmon", not four individual managers looking out for their individual gear groups independent of one another.

Re: August 2017 Troll closure

I would like to take the opportunity that our state founders provided me with to provide input into the management of fisheries resource, this being the Board of Fish process.

Appropriately 3.3% of SPC's sales (\$1,400,000) comes from the August King Salmon opener. The 2017 August opener was closed by emergency order (E.O.) with the reasoning being the conservation of wild SEAK Kings. The Commissioner of ADF&G making the E.O. provided untimely and poorly thought out reasoning for this closure. This action cost the communities of S.E. Alaska in



excess of \$3.3 million. As far as I can determine, only 64 Kings were (saved) moved forward to the next season. As they are all immature fish, it is impossible to know if 100% of these "saved" Kings will be present in next year's migration. A fisherman fishing a troll permit lost an average of \$4,000. Seafood Producers Cooperative has 570 owners, who will all take reductions in income because of reduced production volumes. This closure was made when the ADF&G Sportfish Department realized they might be over their quota. Actually sport fishers went over their quota by 44%. What actually occurred was a blatant reallocation of Treaty Kings and an unwillingness of the managers to open trolling when sportfishing would be closed. This occurred due to poor data collection and non existent timeliness in its data analysis, foregoing real time management. It would be real easy for me to look any sport fisherman in the eye and explained the why's of management if I had the data in hand to back it up. ADF&G has been blessed in the past when the abundance of King Salmon allowed for sloppy management practices. The game changer arrived when all but one SE King Salmon system started having escapement problems. When "conservation" of a resource is to used, it is the responsibility of senior management to make sure all user groups are sharing in the economic losses that will occur due the conservation measures.

I stress again that you, the Board of Fish, adapt real time management and good data collection. For good data collection to occur, I believe the proposed management areas listed in the draft Unik River plan are inadequate. The area used for the management of the spring troll fisheries should also be used by the Sportfishing Department. I would predict that if the same criterion used for management and data collection of the Trollers was used by the sport fisherman, you would find that sport fishermen are catching over 50% of the Ketchikan area Kings.

Re: proposal #172

I wrote this proposal in the days before there were conservation issues . My hope is that this proposal will not be overshadowed by the short term conservation issues at hand. It it a long term adjustment that would only apply if no conservation techniques were necessary. There are other areas, (not only 101-29) that have a high abundance of hatchery King Salmon. These areas



should also be exempt from the spring Management ceilings during the period in which the hatchery Kings are in high abundance. Should you agree to use this proposal, the ex-vessel value of King Salmon will increase. The most valuable King Salmon per King Salmon counted towards the US Canada treaty cap is caught in the Spring troll fisheries. We should maximize the spring when SEAK wild stock conservation is not an issue. This should be implemented on a statistical areas by area basis.

Re:proposal #182

This proposal sets a defined start date for the August King Salmon troll fisheries. By doing this we accomplished several useful things.

1. We are letting the market know when Alaska Kings will be available.
2. It allows Trollers to make better business decisions in regards to where they need to be and when.
3. It requires ADF&G to process and report the July opening statistics in a timely manner. July numbers should be readily available 10 days before the opening date.

I selected a Tuesday opening day for personal reasons. It really doesn't matter if it is specific date (i.e. the 9th of August) or a day of the week (i.e. the second Tuesday).

Thank you for considering this lengthy opinion, I trust that you will give thought to my suggestions.

Charlie



December 28, 2017

To:

Alaska Dept of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
Email: dfg.bof.comments@alaska.gov

From:

Chris Combs  
503 Charteris St  
Sitka, Alaska 99835

Members of the Board of Fisheries:

I hold a power troll permit and fish spring, summer and to a lesser degree during the winter troll open seasons. Salmon fishing, and especially king salmon fishing, makes up a substantial portion of my annual income.

I purchase a hunting/fishing/trapping license with a king salmon stamp every year and participate in each as fully as time permits. Some years I participate in the federal subsistence hunt as well.

Please accept my comments on many proposals before the Board of Fisheries this year.

### **Herring**

In general, I am concerned about over harvesting herring. I believe that health of herring stocks directly affects the health of the ocean including the concerned wild Alaska salmon. I further believe that we are currently overfishing herring and that much greater research should be conducted. Please be conservative with herring harvest. Further, subsistence use should be held in much higher regard than commercial harvest.

Proposal 94: I OPPOSE this proposal to reduce the herring spawn ANS

Proposal 99: I support the AMENDED version of this proposal that was unanimously supported by the Sitka AC on November 29, 2017

Proposal 104: I OPPOSE proposal 104 to eliminate the Sitka herring sanctuary area.

Proposal 106: I SUPPORT this proposal to enlarge the sanctuary area.



## **Groundfish**

Proposal 113: I SUPPORT this proposal

Proposal 116: I SUPPORT this proposal to limit the growth of the charter blackcod catch.

Proposal 123: I OPPOSE proposal 123 since this would further reduce lingcod bycatch in the salmon troll fishery in the Central Southeast Outside (CSEO) that does not reach its current allocation.

Proposal 124: I SUPPORT this proposal

Proposal 126: I OPPOSE this proposal.

Proposal 127: I support this proposal if it is written with a "NOT" which was intended *"Establish provisions for NOT reducing the resident pelagic rockfish bag limit in Central SE outside waters."*)

Proposal 127: I OPPOSE reducing the bag limit for resident sport fishermen for pelagic rockfish . Local resident fishing should be considered separately and "protected" from charter related concerns.



## **Salmon**

In general, as a troller, I am concerned about poor Chilkat, Salmon, Unik action plans that do not attempt to allow full catch of treaty kings, allocation of enhanced salmon, the treaty king process/results. I address the action plans separately at the end of these comments.

Regarding allocation of enhanced salmon, troll catch continues to be well behind gillnet and seine catches with respect to allocation. I am especially concerned that NSRAA and the department do not sufficiently consider these continual shortages in troll hatchery fish catches.

It seems the original intents of the salmon treaty negotiation are not being respected, remembered or being considered recently. Please consider a full review of history of the treaty and make sure it is being applied appropriately today.

Proposals 132, 133 & 134: I OPPOSE these three interlinked proposals

Proposal 137: I SUPPORT this proposal to increase the *resident* sportfish possession limit of Chinook in years of high or very high abundance

Proposal 138: I SUPPORT this proposal to allow retention of other species when fishing with 2 rods for Chinook is allowed for residents.

Proposal 139: I OPPOSE this proposal to overturn the current Southeast Cove THA Management Plan

Proposals 140-143 & 145: COMMENT- the trollers are further behind allocation than seiners. Any allocation change should benefit the troller's allocation imbalance over seiners.

Proposal 144: I SUPPORT this proposal to provide additional troll opportunity to harvest of hatchery salmon at Deep Inlet. Trollers are behind gillnetters and seiners in allocation of these fish.

Proposal 146: I OPPOSE this proposal to exclude certain SE hatcheries from the allocation

Proposal 155: I OPPOSE this proposal to remove conservation measures to protect northern inside sockeye stocks.

Proposal 166: I OPPOSE proposal 166 to create a second seine index fishery about 9 miles north of an existing seine index fishery.

Proposal 173: I SUPPORT this proposal to delete the sunset clause in 5 AAC 29.114 Districts 12 & 14 Enhanced Chum Troll Fisheries Management Plan.

Proposal 174: I SUPPORT this proposal to create additional spring troll opportunity in a



manner that is consistent with the concerns for SE wild Chinook

Proposal 175: I SUPPORT, but suggest that it be AMENDED to read: (d)(3) When a spring king salmon troll fishery is closed, a person may not have king salmon aboard a salmon troll vessel while fishing for chum salmon **in an area closed to trolling for king salmon.**

Proposal 176: I SUPPORT this proposal keep the troll fleet from having to stop fishing for Crawfish hatchery chum during a closure intended to conserve/re-allocate coho.

Proposal 177: I SUPPORT this proposal to allow the department to identify areas where hatchery-produced coho can be targeted with troll gear when fishing on wild stocks is not permitted for allocation or conservation reasons.

Proposal 180: I SUPPORT this proposal to permit the spring troll fisheries to operate as originally envisioned, even in years when an abundance of non-Alaskan fish are present.

Proposal 181: It is not acceptable to lose treaty fish. The department should seek to maximize treaty fish while protecting wild Alaska kings. I am on the fence regarding this proposal. Would the current 70/30 provide more treaty kings to the trollers? I recognize that a 60/40 split would usually provide greater dollars to the fleet due to higher price per pound, BUT if the department closes the August period without good reason there is an immense loss to the fleet.

Proposal 184: I SUPPORT this proposal to give hand trollers more options.

Proposal 199: I SUPPORT this proposal to increase bag limits of abundant Juneau area Dolly Varden.

Proposal 204: I am OPPOSED to increasing Windfall Creek sockeye daily bag limit.



Regarding the 2018 Action plans to protect concerned wild salmon stocks:

I feel that the action plans reflects a poor response by the Department. As a troller, my greatest concerns with the action plan:

1. Status quo: I question the use of last year's troll related regulatory decisions as the Status Quo as an option. How can regulatory decisions that the department admits were not good, not made locally based on scientific information, reactive and not evenly applied among use groups? The charter fleet was allowed to fish in the spring while the troll fleet was closed down in the same areas...this makes no sense. Troll areas (Sitka for instance) were closed during times after these salmon are known to be already in the rivers. Further, some areas (like Sitka) have known low numbers of these concerned salmon in our catches. The department admitted that decisions were not left to local biologists. It is thought that large closures were made for international political reasons; I thought trollers gave up fish long ago in the treaty process to pre-pay for future conservation.
2. There is no mention of recommendation for the August troll opener. Perhaps it is implied that the August fishery would be closed as part of the "Status Quo". This is not acceptable.
3. There should be consideration of catching ALL of the treaty kings while still protecting the concerned Alaska wild kings.
4. Local troll closures should be considered over SE wide troll closures. I noticed that the gillnet and sport closures presented were local in nature; they were not SE wide closures. After all, the department has claimed that these concerned salmon are the best studied in all the world including their migration routes/where they are caught and when. It is known, by independent analysis, that at certain times and certain areas (Sitka area, for instance) have low or no concerned salmon in their catches based on the department's available creel data. The genetic database also suggests similar conclusions.





Chair Jensen and the Board of Fisheries

Statement by Chris Guggenbickler

Current President and gillnet representative on the SSRAA board of directors

Current chair and 26 year member of the Wrangell F&G Advisory Committee

Joint Regional Planning Team (JRPT) gillnet representative for SSRAA

Vice President United Southeast Alaska Gillnetters

As a board member of SSRAA and representative on the JRPT nothing is more frustrating than making decisions to increase opportunities for user groups to access enhanced fish while knowing wild value is being shifted without recognition in these opportunities. There seems to be a tendency to draw attention to one particular imbalance while choosing to ignore others that might not support one's position, all the while shifting value that is unaccounted for.

**Proposal 146** would do this by not recognizing value realized to the fleets from non-regional associations. DIPAC would account for the largest portion of this value which contributes on average 52% of all the enhanced value the gillnet fleet receives. Some user groups would argue they are entitled to this value through the Enhanced Salmon Allocation Plan (ESAP) yet they pay nothing in the form of 3% Salmon Enhancement Tax (SET) toward DIPAC's budget, yet SET revenue received from DIPAC production contributes to NSRAA.

At the recent October workshop of the Board of Fish (BOF) a motion was passed to create a task force to look at allocation in Southeast by overall value. As we were pleased to see the BOF pass this proposal by its own merit, it was quickly reconsidered due largely to a letter submitted by SEAS and ATA (rc 47 of that workshop). The letter states there is a proposal where the idea of a task force to look at allocation by overall value could be properly vetted, this is that proposal. It was not USAG's intent to have a task force come up with any conclusions going into this BOF meeting, but as a charge coming from the broad discussions at this meeting.

In 1991 the Southeast Allocation Task Force (SATF) was created to look at this allocation by hatchery fish alone. 26 years later we find enhanced and wild fish intertwined in nearly every fishing opportunity afforded to the fleets. From pacific salmon treaty language to mixed stock fishery management enhanced value is taken into account with wild. Increased opportunities to access enhanced fish is given to each fleet, yet the incidental wild value accrued is not credited as fleet benefit. Furthermore, these opportunities can negatively affect another fleets wild



value. For example, in 2012 seine fisheries were first conducted in the Amalga Harbor THA to create seine access to DIPAC production surplus to DIPAC's cost recovery needs to access enhanced fish. In 2017 there was an incidental seine harvest of 103 chinook in this fishery while gillnet fleets were curtailed in districts 11 and 15 to conserve Chilkat and Taku stocks. Sport fisheries went through a large period of non-retention in this area to conserve these stocks as well. Of course, the value of these kings as well as the wild sockeye and pinks incidentally harvested were not counted towards the seine fleets enhanced allocation.

Previous BOF members have spoken to the many overlapping allocative management plans in SE but it appears all allocation is mainly addressed in four plans, 5AAC 33.363 (guidelines for allocating pink, chum and sockeye between net fisheries, 5AAC 33.364 (enhanced salmon allocation plan), 5AAC 29.065 (allocation of coho salmon), 5AAC 29.060 (allocation of king salmon). As we consider these allocation plans between gear groups in Southeast Alaska which allocation plan takes precedence? Is it the pink, chum and sockeye plan between the net groups? After all it was the first plan to be adopted as a baseline in 1989. Is it the king and coho plans both effective in 1998? Or is it the enhanced management plan adopted last in 1994? How does each plan effect the other?

This brings us to current times where one gear group or another will lobby the BOF to correct one particular imbalance with disregard for other imbalances. What is the bottom line? Does one fleet gain access to more of Alaska's resources at the expense of another fleets economic viability? Some would support this, but I would argue historic sharing percentages have been the only constant through BOF history. The only way I see to do this is to look at the overall value sharing between fleets. After all, if gear group representatives on the SATF knew the enhanced salmon allocation plan would consequently shift wild value over time it would not have been a consensus.

So, let's look at some examples of pros and cons of allocation as we have now, and allocating by overall value.

**Proposal 177** submitted by ATA proposes to increase coho opportunity in areas of high hatchery abundance due to the fact they are below their allocation of enhanced salmon. In 2017 the hatchery component of cohoes caught in the troll fishery was 18%, undoubtedly the department would find areas of higher hatchery contribution than this, yet it is likely there would still be a sizable wild harvest which would be an increased value of wild salmon afforded by an enhanced opportunity.

If we look to 5AAC 29.065 Allocation of coho salmon we find trollers allocation to be 61%, yet in 2017 trollers harvested 79% of all cohoes. The seine fleet was short of their 19% allocation by 9% for a total loss of 244,500 cohoes. The gillnet fleet as well was over 50% below their



allocative range of coho salmon according to ADF&G data. This gillnet shortfall equates to over 190 thousand cohoes and is expected to continue into the future due to extensive summer coho production reductions at SSRAA in a gillnet district which previously contributed primarily to the gillnet fishery.

By these criteria alone one would expect a reduction of troll opportunity on all coho, yet these fish are of vital importance to the economic viability of the troll fleet, even more so now with current king salmon harvest restrictions. Do we say trollers should stop fishing on coho because they are above their allocation of coho when they have proven they can be effective harvesters of this species? I would prefer to apply this overage against their imbalance of enhanced fish through recognizing their overall value.

Certainly, finding a species beyond Chinook and coho the troll fleet can consistently harvest has been a challenging task, as we look at

**Proposal 173** to remove the sunset from the Homeshore fishery that started as a Chinook opportunity and two board cycles ago was a recommendation by the RPT through an industry consensus to allow this as a new chum troll fishery. This fishery was approved again with a sunset last board cycle. In evaluating the data on this new enhanced troll opportunity since 2010 there have been 136,894 unmarked (assumed wild) chum salmon harvested in this fishery. I'm opposed to lifting the sunset on this fishery, only pointing out the shift of value in this enhanced opportunity that is not recognized currently. Previous to this fishery these chums were either caught by a net fleet or part of an escapement level to allow opportunity to the net fleets. In rc 47 of your fall workshop ATA and SEAS write these wild fish are fully allocated, yet we are continuing to allow increased incidental harvest opportunity to a fleet with no appreciable catch history for this species. How do we account for this shift of value? Is it fair to not recognize it? Do you remove the sunset and not look back? I would certainly hope not. Once again allocating on overall value would capture this value shift.

This is the problem with any new proposed fishery; what are the unintended consequences? What will the bycatch be in

**Proposal 174?** Certainly, we would like to allow troll access to new NSRAA production of enhanced chums to the troll fleet, but what else will they catch? I would hope the BOF would require the department to compile data to be re-visited at the next BOF meeting to study any potentially adverse effects of this fishery. Furthermore, it appears the area is rather large, this may be needed to find adequate return patterns and milling areas, but on first glance it appears the southern portion of this area should be vetted with shellfish representatives as there is a potential gear conflict with the Dungeness fishery in this area. Of course, this new enhanced fishery will undoubtedly shift some wild value.



**Proposal 150** is another new release site aimed at the troll imbalance of enhanced fish. In 2017 there was a much larger than anticipated return of three year olds to Crawfish Inlet suggesting good survivals at this release site. This project was presented to the RPT as a troll preference release aimed at giving the troll fleet terminal access without displacing currently site dependent fleets such as in Deep Inlet. One of the main concerns by the department for this site's permitting is straying to a near chum indicator system at West Crawfish. It is likely the troll fleet will incidentally harvest some of these wild chums due to increased pressure from this new release. How shall we account for this shift of value as previously mentioned the troll fleet has no current catch history of these fish?

In discussions at the recent task force meetings it was presented this new release at Crawfish Inlet is expected to create a significant increase in enhanced value. This release coupled with other new NSRAA projects at SE Cove and Thomas Bay are anticipated to create an increase of 684,848 chum in 2018, 1,469,923 in 2019 and 2,177,859 new chum salmon by 2020. This new production alone has the potential to shift a gear group 10 percentage points in enhanced value without any other significant changes, such as

**Proposal 143** that shifts a rotational schedule at Deep Inlet THA. The current sunseting schedule was set up between USAG and SEAS as a way to allow increased seine opportunity in July at a 1/1 ratio, switching to a 2/1 ratio in favor of gillnetting when opportunities on the coast and pink harvests created opportunities elsewhere for seine. This is the same agreement that will be sunseting at Anita Bay THA as well.

Currently there are 25 gillnet permit holders that are residents of Sitka that would be displaced if this proposal were to pass. A 2/1 seine ratio at Deep Inlet would shift seine benefit from NSRAA projects from 55% up to potentially 75% of all fleet value from that regional association. A 2/1 ratio would likely shift even more gillnet value from currently the only THA opportunity they have from NSRAA as the majority of the fleet would shift to other areas they could fish more than a day or two a week.

Another drastically devastating proposal to the gillnet fleet is

**Proposal 140** which would prohibit gillnetting in Anita Bay THA, the only terminal opportunity in central SE for gillnetters primarily residing in Wrangell and Petersburg. Combined gillnet permits in these two communities total over 130 individual permit holders that would lose access to this SSRAA release by this drastic proposal. This action would not only shift summer chum at this site but there is also Chinook and coho released at this site. The king and coho releases have been sparsely attended by the seine fleet as they are more scratch type fisheries and quality would suffer on these fish as they built up to harvestable levels by the seine fleet.



Nonetheless if we think of how this is justified with allocation we find the gillnet fleet above their range in enhanced fish only due to the success of an association, DIPAC that does not receive 3% tax monies from the fleets. Yet the seine fleet receives more than their combined share of value from associations supported by the SET. We find the seine fleet 1% below their enhanced allocation 5 year rolling average with new production at a level to shift a gear group 10% coming on line at NSRAA. Certainly, any one gear group is not expected to harvest all of the fish from this new production but currently there is no gillnet access at any of these sites.

Furthermore, once DIPAC paid off their hatchery loans from the revolving loan fund their excess cost recovery became a surplus above operation and reserve needs. These monies are and have been granted to NSRAA and SSRAA to buy fleet opportunity in lieu of cost recovery. In 2018 DIPAC monies will be granted to the regionals at the 5.8 million dollar level. History has shown these monies benefit seine more than gillnet and this action alone may very well bring the seine value within their allocation.

We also find a shift of wild value not accounted for in enhanced opportunity afforded to the seine fleet. There has been a “new” fishery in District 2 outside a SSRAA chum release at Kendrick Bay started in 1999 that shifts wild and enhanced value. Over the course of that fishery an average of over 72,000 pinks and over 6,000 sockeye have been harvested annually (by department compiled data). There is also times of high king salmon abundance in this area with recorded harvest of over 2500 in 2016, other years see restrictions of no chinook retention and numbers are not available for kings handled or incidental mortality in this fishery. There is also a shift of enhanced value in this fishery due to interception of Neets Bay returning chum that would have contributed to the troll fishery there.

As we start to get a grasp of the complexities of value being shifted through each of these decisions we question the need for

**Proposal 145** which would allow seiners back in to Nakat Inlet THA. This is the smallest summer chum release by SSRAA and an agreement was made by their board in 2003 to go gillnet only at Nakat in exchange for an increase of 10 million at Kendrick which brings that release to 18 million (Kendrick is over 30 million today). I am sure if DIPAC survivals fall and gillnetters requested rotations at Kendrick this would be perceived very hostile by the seine fleet as this proposal is to gillnet.

But what happens if we do shift enhanced value to seine? What happens to their overall value? If we look to the department generated data attached to these comments we would note that their percentage of overall value would go up. But we find they are already harvesting more value than a baseline period prior to adoption of the ESAP. This data was compiled with the assumption that the 10 years prior to adoption of the enhanced salmon management plan was



most relevant and that 5 year rolling average was most consistent with the enhanced salmon management plan, smoothing out highs and lows.

Certainly, we would not need to shift more wild value to the seine fleet as

**Proposal 155** would do. Changing the sockeye cap on this mixed stock fishery would likely shift wild pink and sockeye value to the seine fleet. So, let's look at 5AAC 33.363 guidelines for allocating pink, chum and sockeye between net fleets and department data which shows gillnet is already below their accumulative allocation of sockeye and pinks. Any increased opportunity to a fleet that has increased their efficiency tremendously since this was initially in effect in 1989 would be detrimental to the gillnet fleet fishing behind this seine fishery. This migrating corridor to districts 11 and 15 is vital to the economic viability of the gillnet fleet providing over 50% of the total value to our fleet in SE Alaska.

Furthermore, in this BOF meeting action plans will be addressed to limit gillnet opportunity in these districts to conserve chinook salmon. These actions would negatively affect harvest rates significantly for enhanced chum for the gillnet fleet, also passing sockeye and pink salmon through these districts reducing the gillnet percentage of wild pink, chum and sockeye. So why would we even consider liberalizing another fleets opportunity in this area?

Thinking about pink salmon imbalances we should consider

**Proposals 154, 169 and 170** which are all pertaining to increasing gillnet access to pink salmon. Currently gillnetters are on average historically below their allocation of pink salmon addressed in 5 AAC 33.363. If we look at this imbalance as a 5 year rolling average as we do for enhanced we find gillnet is short of their allocation by 4 million 129 thousand fish for the last 5 years. This computes to a gillnet shortfall of \$990,000.00 annually from loss of wild pink opportunity. This loss of wild value computes to between 2 and 3 percent annually for the last 5 years of the enhanced value.

Either we could apply this shortfall against the enhanced value and find the seine fleet within their range via an overall value method. Alternatives to this would be to increase seine opportunity in Deep Inlet and Anita Bay and liberalize gillnet opportunity for pink salmon in these proposals. After all if we choose to make allocative shifts for one gear group to satisfy one allocation plan it would not be fair to ignore other allocation plans in those decisions, especially when it shifts historic overall value.

As we look at the pink imbalance I find the need to alter the district 1 management in

**Proposal 153** highly unnecessary. On the contrary this proposal should probably be amended to increase gillnet time. As we just referenced the wild pink imbalance in the last group of



proposals we should also note that gillnet participation is down considerably in this district since adoption of this plan. Furthermore, increased efficiency in the seine fleet alone changes the balance since implementation of this management plan.

**In conclusion** it seems the overall value should be evaluated when considering any allocating shifts in sharing arrangements. Is the intent of the proposer to keep a balance in historic sharing arrangements or give their fleet increased value at the expense of another? In recognition of the current overall value to all fleets, increasing chinook conservation measures that will negatively impact troll and gillnet more than seine and new production coming on line I would ask the board to maintain status quo on proposals that shift value between fleets. Furthermore, I would respectfully ask the BOF to ask the JRPT to evaluate allocation by overall value to be presented back to the BOF in 2021.

Thank you for consideration of these comments,

Chris Guggenbickler



Total Ex-vessel / Overall Salmon Values					Ex-vessel value in five-year rolling averages		
	Seine	Troll	Driftnet	S+T+DGN Total	Seine	Troll	Gillnet
1985	\$52,018,934	\$25,009,669	\$17,083,901	\$94,112,504			
1986	\$53,893,815	\$28,074,767	\$14,585,793	\$96,554,375			
1987	\$22,739,529	\$25,368,212	\$19,227,191	\$67,334,932			
1988	\$53,314,374	\$29,827,740	\$32,342,986	\$115,485,100			
1989	\$91,241,060	\$23,526,234	\$20,578,737	\$135,346,031	54%	26%	20%
1990	\$44,821,503	\$31,101,694	\$16,439,366	\$92,362,563	52%	27%	20%
1991	\$36,071,105	\$25,162,099	\$12,037,061	\$73,270,265	51%	28%	21%
1992	\$51,054,882	\$29,351,980	\$20,850,361	\$101,257,223	53%	27%	20%
1993	\$52,894,318	\$26,642,558	\$15,904,271	\$95,441,147	55%	27%	17%
1994	\$61,164,567	\$38,943,302	\$17,207,769	\$117,315,638	51%	32%	17%
1995	\$55,806,812	\$16,673,792	\$16,899,040	\$89,379,644	54%	29%	17%
1996	\$42,813,455	\$16,394,667	\$14,430,995	\$73,639,117	55%	27%	18%
1997	\$40,813,997	\$18,853,651	\$11,143,699	\$70,811,347	57%	26%	17%
1998	\$45,509,746	\$14,974,147	\$11,345,286	\$71,829,179	58%	25%	17%
1999	\$56,402,089	\$20,442,587	\$11,489,118	\$88,333,794	61%	22%	17%
2000	\$38,060,764	\$14,786,178	\$10,940,909	\$63,787,851	61%	23%	16%
2001	\$48,742,800	\$17,191,517	\$11,316,836	\$77,251,153	62%	23%	15%
2002	\$20,244,170	\$13,164,474	\$8,132,853	\$41,541,497	61%	24%	16%
2003	\$26,705,739	\$14,812,555	\$8,903,210	\$50,421,504	59%	25%	16%
2004	\$31,672,452	\$29,016,910	\$11,778,867	\$72,468,229	54%	29%	17%
2005	\$36,073,649	\$26,770,816	\$12,753,519	\$75,597,984	52%	32%	17%
2006	\$27,536,028	\$34,645,633	\$20,007,955	\$82,189,616	44%	37%	19%
2007	\$49,646,050	\$30,985,116	\$15,081,267	\$95,712,433	46%	36%	18%
2008	\$40,986,039	\$36,566,992	\$24,209,429	\$101,762,460	43%	37%	20%
2009	\$48,417,377	\$22,942,077	\$18,578,453	\$89,937,907	46%	34%	20%
2010	\$56,238,100	\$31,945,182	\$26,618,998	\$114,802,280	46%	32%	22%
2011	\$122,177,082	\$32,413,206	\$31,126,506	\$185,716,794	54%	26%	20%
2012	\$73,082,389	\$29,855,484	\$37,475,213	\$140,413,086	54%	24%	22%
2013	\$154,063,995	\$41,312,132	\$29,456,345	\$224,832,472	60%	21%	19%
2014	\$58,358,331	\$46,554,302	\$28,379,708	\$133,292,341	58%	23%	19%
2015	\$55,228,071	\$25,793,745	\$20,621,205	\$101,643,021	59%	22%	19%
2016	\$36,497,295	\$32,187,715	\$22,194,539	\$90,879,549	55%	25%	20%
<b>1985-93</b>							
<b>Average</b>	<b>\$50,894,391</b>	<b>\$27,118,328</b>	<b>\$18,783,296</b>	<b>\$96,796,016</b>			
<b>Percentage</b>	<b>53%</b>	<b>28%</b>	<b>19%</b>				
Allocation Plan Percentages							
5 AAC 33.364	44-49%	27-32%	24-29%				
<b>'94-'16 Average</b>	<b>\$53,314,826</b>	<b>\$26,401,138</b>	<b>\$18,264,857</b>	<b>\$97,980,822</b>			
<b>Ex-vessel</b>							
<b>Percentage</b>							
<b>1994-2016</b>	<b>54%</b>	<b>27%</b>	<b>19%</b>				



**Hatchery-Produced Salmon Values****Allocation value in five-year rolling averages**

	seine	troll	gillnet	Yearly Value
1985	\$3,428,844	\$1,420,786	\$1,200,076	\$6,049,706
1986	\$2,770,790	\$2,400,444	\$1,245,862	\$6,417,096
1987	\$4,298,648	\$1,460,796	\$1,426,244	\$7,185,688
1988	\$5,475,727	\$1,987,416	\$4,547,547	\$12,010,690
1989	\$2,718,810	\$1,599,441	\$2,323,091	\$6,641,342
1990	\$2,318,017	\$3,774,529	\$1,780,854	\$7,873,400
1991	\$2,353,588	\$3,837,368	\$2,217,805	\$8,408,761
1992	\$6,652,722	\$4,782,046	\$4,653,863	\$16,088,631
1993	\$11,089,282	\$4,353,481	\$4,934,886	\$20,377,649
1994	\$8,876,576	\$5,317,271	\$3,797,692	\$17,991,540
1995	\$14,789,338	\$2,871,032	\$7,169,053	\$24,829,423
1996	\$12,061,185	\$3,224,761	\$4,184,597	\$19,470,543
1997	\$10,752,998	\$3,004,073	\$4,037,169	\$17,794,241
1998	\$9,277,676	\$1,973,521	\$3,792,912	\$15,044,109
1999	\$10,061,642	\$3,461,492	\$4,110,113	\$17,633,247
2000	\$17,113,326	\$3,465,550	\$6,219,903	\$26,798,778
2001	\$7,170,159	\$3,752,912	\$4,852,294	\$15,775,364
2002	\$3,645,488	\$2,303,490	\$3,627,174	\$9,576,152
2003	\$3,744,188	\$2,774,408	\$3,385,285	\$9,903,881
2004	\$5,498,187	\$4,139,539	\$5,400,059	\$15,037,785
2005	\$4,405,236	\$3,522,736	\$4,707,650	\$12,635,622
2006	\$15,109,033	\$4,192,671	\$12,215,370	\$31,517,075
2007	\$6,531,971	\$4,728,923	\$8,851,525	\$20,112,418
2008	\$16,158,998	\$7,319,611	\$16,385,073	\$39,863,682
2009	\$12,746,563	\$4,032,749	\$12,255,256	\$29,034,568
2010	\$17,451,677	\$7,215,190	\$15,728,240	\$40,395,107
2011	\$15,430,492	\$9,109,654	\$20,391,332	\$44,931,479
2012	\$34,363,203	\$8,113,226	\$28,453,598	\$72,137,175
2013	\$24,834,517	\$13,266,168	\$19,221,485	\$57,303,369
2014	\$12,912,970	\$8,786,771	\$17,772,977	\$37,637,261
2015	\$16,689,459	\$6,063,853	\$13,068,340	\$35,821,652
2016	\$10,513,342	\$5,018,230	\$11,450,087	\$26,981,660

Seine	Troll	Gillnet
49%	23%	28%
44%	28%	28%
41%	30%	29%
38%	31%	30%
42%	31%	27%
44%	31%	25%
50%	24%	26%
54%	21%	25%
57%	19%	24%
59%	17%	24%
60%	15%	25%
61%	16%	23%
58%	17%	25%
56%	18%	27%
52%	20%	28%
48%	21%	30%
39%	26%	35%
41%	22%	37%
40%	22%	39%
40%	20%	40%
41%	18%	41%
42%	17%	41%
39%	19%	42%
42%	16%	41%
43%	17%	39%
42%	18%	40%
42%	18%	40%
43%	18%	39%

<b>1985-'93</b>				
<b>Average</b>	<b>\$4,567,381</b>	<b>\$2,846,256</b>	<b>\$2,703,359</b>	<b>\$10,116,996</b>
<b>Percentage</b>	<b>45%</b>	<b>28%</b>	<b>27%</b>	

Plan %                      44-49%                      27-32%                      24-29%

<b>1994-'16</b>				
<b>Average</b>	<b>\$12,614,705</b>	<b>\$5,115,558</b>	<b>\$10,046,834</b>	<b>\$27,748,962</b>
<b>Percentage</b>	<b>45%</b>	<b>18%</b>	<b>36%</b>	



**Natural Production Values**  
**(Ex-vessel minus hatchery-produced)**

**Natural production**  
**value in five-year**  
**rolling averages**

	seine	troll	gillnet	total
1985	\$48,590,090	\$23,588,883	\$15,883,825	\$88,062,798
1986	\$51,123,025	\$25,674,323	\$13,339,931	\$90,137,279
1987	\$18,440,881	\$23,907,416	\$17,800,947	\$60,149,244
1988	\$47,838,647	\$27,840,324	\$27,795,439	\$103,474,410
1989	\$88,522,250	\$21,926,793	\$18,255,646	\$128,704,689
1990	\$42,503,486	\$27,327,165	\$14,658,512	\$84,489,163
1991	\$33,717,517	\$21,324,731	\$9,819,256	\$64,861,504
1992	\$44,402,160	\$24,569,934	\$16,196,498	\$85,168,592
1993	\$41,805,036	\$22,289,077	\$10,969,385	\$75,063,498
1994	\$52,287,991	\$33,626,031	\$13,410,077	\$99,324,098
1995	\$41,017,474	\$13,802,760	\$9,729,987	\$64,550,221
1996	\$30,752,270	\$13,169,906	\$10,246,398	\$54,168,574
1997	\$30,060,999	\$15,849,578	\$7,106,530	\$53,017,106
1998	\$36,232,070	\$13,000,626	\$7,552,374	\$56,785,070
1999	\$46,340,447	\$16,981,095	\$7,379,005	\$70,700,547
2000	\$20,947,438	\$11,320,628	\$4,721,006	\$36,989,073
2001	\$41,572,641	\$13,438,605	\$6,464,542	\$61,475,789
2002	\$16,598,682	\$10,860,984	\$4,505,679	\$31,965,345
2003	\$22,961,551	\$12,038,147	\$5,517,925	\$40,517,623
2004	\$26,174,265	\$24,877,371	\$6,378,808	\$57,430,444
2005	\$31,668,413	\$23,248,080	\$8,045,869	\$62,962,362
2006	\$12,426,995	\$30,452,962	\$7,792,585	\$50,672,541
2007	\$43,114,079	\$26,256,193	\$6,229,742	\$75,600,015
2008	\$24,827,041	\$29,247,381	\$7,824,356	\$61,898,778
2009	\$35,670,814	\$18,909,328	\$6,323,197	\$60,903,339
2010	\$38,786,423	\$24,729,992	\$10,890,758	\$74,407,173
2011	\$106,746,590	\$23,303,552	\$10,735,174	\$140,785,315
2012	\$38,719,186	\$21,742,258	\$9,021,615	\$69,483,059
2013	\$129,229,478	\$28,045,964	\$10,234,860	\$167,510,302
2014	\$45,445,361	\$37,767,531	\$10,606,731	\$93,819,623
2015	\$38,538,612	\$19,729,892	\$7,552,865	\$65,821,369
2016	\$25,983,953	\$27,169,485	\$10,744,452	\$63,897,890

Seine	Troll	Gillnet
54%	26%	20%
53%	27%	20%
52%	28%	20%
55%	26%	19%
57%	27%	16%
53%	32%	16%
55%	30%	15%
56%	28%	16%
57%	29%	15%
58%	27%	15%
62%	24%	14%
60%	26%	14%
63%	25%	12%
63%	25%	12%
61%	27%	12%
56%	32%	12%
55%	33%	12%
45%	42%	13%
47%	41%	12%
45%	43%	12%
47%	41%	12%
48%	40%	12%
60%	30%	10%
60%	29%	11%
68%	23%	9%
66%	25%	9%
67%	24%	9%
60%	29%	10%

**1985-'93**

<b>Average</b>	<b>\$46,327,010</b>	<b>\$24,272,072</b>	<b>\$16,079,938</b>	<b>\$86,679,020</b>
<b>Percentage</b>	<b>53%</b>	<b>28%</b>	<b>19%</b>	

Plan %      44-49%      27-32%      24-29%

**1994-'16**

<b>Average</b>	<b>\$40,700,121</b>	<b>\$21,285,580</b>	<b>\$8,218,023</b>	<b>\$70,203,724</b>
<b>Percentage</b>	<b>58%</b>	<b>30%</b>	<b>12%</b>	





Submitted By  
Christopher Thorgesen  
Submitted On  
12/28/2017 2:51:40 PM  
Affiliation

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Address  
PO BOX 887  
Haines, Alaska 99827

To Whom It May Concern Regarding the Southeast Alaska Proposed King Salmon Closure:

As a year round Haines resident who owns a Charter Fishing Company in Haines, I would like to submit my comments.

I believe there are only 3 charter fishing boats in Haines and 3 charter fishing boats in Skagway which fish for King Salmon . The combined catch for 2018 would be so small as to make zero actual difference in King Salmon survival rate. As last year was a catch-and-release year for King Salmon, I doubt very seriously that the combined mortality rate would make any difference whatsoever. I know that we caught only two king salmon in 2017 and both were released without incident due to our barbless hooks and heightened awareness of the low King Salmon population.

Conversely, should the rule change from catch-and-release to no fishing at all, the effects would be gravely felt by both communities, in particular for those who own, work on, or repair these boats. Tourists will pay top dollar to fish for a salmon that they will not likely catch and must return immediately if they do. However, these same tourists will pay nothing should the salmon fishing be discontinued altogether. The harbors will not benefit from the boat slip sales, fuel sales, and taxes. The state will feel the loss of license and king salmon stamp sales, and the communities will feel the loss of jobs, necessary supply sales, and sales tax collections.

The cost-to-benefit ratio on fully discontinuing king salmon fishing as opposed to simply making charter fishing catch and release only with mandatory barbless hooks is just not worth it.

Please vote to keep king salmon fishing in 15A for the full season and keep this entire season catch and release only.

Thank you for your time,

Christopher S. Thorgesen

Kraken Charters LLC

PO BOX 887

Haines, AK 99827

[acathor@yahoo.com](mailto:acathor@yahoo.com)

907-713-7213



Submitted By  
Claire Sanchez  
Submitted On  
12/14/2017 5:38:37 PM  
Affiliation

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Sitka, Alaska 99835

Dear Board of Fisheries,

I am writing in support of Board of Fisheries Proposals 99, 105, and 106. Herring are nowhere near as abundant as Traditional Knowledge indicates they once were and a more conservative management approach is needed. Herring are a keystone species and healthy herring populations are needed to ensure a functioning marine ecosystem.

Every conscientious examination of the issue shows that conservation and subsistence use must take precedence over a commercial sac-roë fishery. Herring fisheries up and down the Pacific Northwest Coast have collapsed, and the Sitka Sound population the last sizable population. The fundamentals of fishery management dictate that we manage this last viable population conservatively. Herring play a fundamental role in the marine ecosystems that support all of Alaska's fisheries. Yet the sac-roë fishery is extremely wasteful. Subsistence users have always known, and Alaskan statute dictates, that wasteful harvest is unethical.

Please support Board of Fisheries Proposals 99, 105, and 106.  
Please oppose Board of Fisheries Proposals 94 and 104.

Sincerely,  
Claire Sanchez



Submitted By  
Clare Kelly  
Submitted On  
12/28/2017 2:03:06 PM  
Affiliation

Phone  
907 747 4523

Email  
[Ckk36@georgetown.edu](mailto:Ckk36@georgetown.edu)

Address  
105 C Monastery St.  
Sitka, Alaska 99835

I am writing to you today in support of proposal 99 which will put a 10% biomass cap on the commercial Herring roe harvest. This proposal is supported by both the STA and the local board of fish advisory committee. Herring stock is significantly declining due to over-harvesting roe by commercial fisheries. This cap is ecologically and culturally critical for the protection of the Herring stock both as a base part of the local food chain, which supports all local fisheries, and as an essential traditional food source for Alaskan Natives. It is imperative that we act to protect and conserve the herring fishery for use by future generations and especially to address the ongoing cultural violence Alaskan Natives to whom this land rightfully belongs.



Submitted By  
Connie I LaPerriere  
Submitted On  
12/20/2017 10:31:38 AM  
Affiliation

I am writing to ask that you reduce the sac roe harvest level. My preference would be to eliminate the fishery. However, Proposal 99 to reduce the harvest level to 10% of forecast biomass would be a step in the right direction. Please consider this reduction for the health of our ecosystems and the other fish that rely on Herring.



Submitted By  
Curt Schlosser  
Submitted On  
12/28/2017 10:01:35 AM  
Affiliation

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Address  
8375 Gold Ray rd.  
Central Point, Oregon 97502

Curtis c. Schlosser                      **Proposal 165**

8375 Gold Ray rd.

Central Point, OR 97502

To ADF&G and To Whom It May Concern:

I am writing this letter to express my concerns and preferences on upcoming proposal for the TSIU fishery and other rivers on the coast. I have fished the Tsiu River about ten years out of the last twelve. I also can attest to the conflict and clash between the rod and reel sportfishers and the commercial fishers. I have witnessed and videoed the commercial takers spinning their boats upstream and downstream of their nets harassing and scarring the fish into their nets and saw many dead fish floating downstream afterwards.. Is that not the definition of "Wanton Waste".

I also vividly remember several years ago when we got out early and had staked a place to fish in a channel and after about an hour, here comes the roar of commercial jetboats and one landed right in front of me where I was fly fishing. A guy jumped out and started driving a stake to stretch their net on, I said to him "What are you doing", to my amazement he would not answer me but completely ignored me as if I did not exist. My background is 38 years military service from Vietnam to 2005, I retired US Army LTC (Lieutenant Colonel) out of Fort Richardson, I started enlisted and rose to that rank. I was not used to someone disrespecting me by not even acknowledging me or returning a response. I was not used to being treated that way. That young fellow does not realize how close he came to an extreme physical lesson in how to treat people and not disrespect them. I did not give 38 years of my life in the military to being disrespected that way. I have come to realize that seems to be a code among the commercial guys that they ignore us and treat us as someone who has no right to be there, they have all the license not us. We are no stakeholders to them. They get tons of fish, we get a few pounds.

My strong recommendation is that each year, the dynamic river channels be analyzed and new markers are set to keep these rude commercial fishermen away from the sportfishers to avoid confrontations. They seem to lack the common people skills to



interact with respect.

Curtis C. Schlosser

US Army LTC (Retired)



PC035  
2 of 2



Submitted By  
Dale Bosworth  
Submitted On  
12/26/2017 9:16:01 AM  
Affiliation

Phone  
907-518-0907  
Email  
[lesleyanddale@gmail.com](mailto:lesleyanddale@gmail.com)  
Address  
PO Box 45  
Petersburg, Alaska 99833

#### Proposal 116- Support

My reason supporting proposal 116 is that management needs to have control of his harvest. Because of the value of sablefish and unrestricted fishing, the temptation to illegally barter or sell sablefish is very probable.

#### Proposals 117, 118, 119, 120, 121, 122- Oppose

My reasons for opposing 117 through 122 are as follows:

1. ADF&G and the Alaska Board of Fish have done an excellent job of management. The biologists on the survey vessel have first-hand knowledge of the fish stocks, far surpassing any federal stock assessment.
2. Limited entry has been a tool for management. Change one gear group to another would put limited entry in jeopardy. There would be lawsuits from many user groups.
3. The SSEI sablefish fishery is well managed with a 2.5 month longline season and a 2.5 month pot fishery season. I believe this should continue as is.
4. The experienced longline fisherman bycatch is insignificant. Hagfish and sand fleas can be avoided. Experienced skippers and crews, their record for lost gear is better than those lost pots in other fisheries. Bycatch for longliners should be broken down into 3 parts: 1. Hook and release 2. Discard of dead fish and fish not marketable 3. Bycatch- the fish on deck to be sold.. Ex. spiny thornyhead- a small percentage may be retained and sold. There is no directed fishing allowed but is well managed as a bycatch.
5. I feel whale predation has been overplayed. As a longline skipper and crew member on other vessels I have never seen any whale predation. The survey vessel in Clarence Straits 2017 saw no whale predation. I do know whale entanglement in crab pot buoyline has been deadly.
6. Pots are not always hauled in a timely manner, therefore I would expect gear loss to marine traffic especially tug and barge traffic to be significant. There will be gear loss due to gear conflict.



To: Board of Fisheries concerning SE Shellfish  
From: Dan Sharp  
Concerning: PROPOSAL 84

Please amend the following regulation to as stated:

5 AAC 31.136. Closed waters in Registration Area A.

Close additional waters in District 2 to commercial pot shrimp fishing,  
as follows:

(4) Shrimp may not be taken: in the waters of Kasaan Bay north and west  
of a line from  
the northern most tip of Daisy Island located at 55°28.816'N lat,  
132°19.379'W long.  
northeast to a point on Kasaan Peninsula located at 55°30.533'N lat,  
132°18.191'W,  
including all waters of Twelve-mile Arm;

Reason:

Over the years, District 2 commercial shrimp season has caused a  
continual  
downward trend to the shrimp biomass in the waters of Kasaan Bay and  
Twelve-mile arm to a  
point where the area can no longer support a commercial fishery.

I came to Alaska in 1974 as a commercial fisherman and have always been a  
supporter of commercial fishing.

I have lived in Kasaan bay for 41 years and have supported the commercial  
pot fisherie in Kasaan bay when

ALL my friends and neighbors did not! until 2014!

Until 2014 I could ALWAYS catch enough shrimp for my family after the  
commercial season was over. Now you  
might catch enough in 5- 40" pots for an omelot.

ADF&G began a new pot gear survey in Kasaan Bay beginning pre-season in  
2011. This survey  
has continually shown a sharp decline of the shrimp biomass. In the 2013  
shrimp season,  
ADF&G began asking commercial shrimp fishermen to fill out logbooks of  
their catch.

The 2013 October commercial shrimp season for District 2 has left the  
personal use shrimpers  
with a low shrimp biomass in Kasaan Bay and Twelve-mile Arm. The shrimp  
biomass has been  
extremely slow to increase and has not recovered from the decimation.  
District 2 itself is a large



area; however the commercial fishing fleet focused their efforts in the waters of Kasaan Bay and Twelve-mile Arm in 2013 which are adjacent to the communities of Hollis and Kasaan. Both areas were hard to navigate during the fishery from the large amount of commercial gear.

I am requesting that the Board of Fisheries enact this regulation change as written to protect the personal use shrimp fishery for the residents of Alaska.



**From:**  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** FW: Personal Use BOF SE Region meeting public comment  
**Date:** Wednesday, December 27, 2017 1:25:45 PM

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**Sent:** Wednesday, December 27, 2017 11:47 AM  
**To:** DFG, DSF R2 Support (DFG sponsored)  
**Subject:** Personal Use

Daniel Martin, phone number: 907 736 2323, has sent you the following inquiry from our website:

This is a recommendation to the Board of fish, meeting in Sitka soon. Those of us who reside full time in Tenakee Springs would like to see the personal use shrimp fishery managed as follows. Cut the pot limit to 5 per person, 20 per boat, daily bag limit no more than 2 gallons of tails, and manage it for a fall/winter fishery, opening September 15th and closing April 15th. Who would this benefit? Year round residents of Tenakee Springs. Who would it impact, the summer folks who claim residence here but are only here 3 months of the year, and of whom there are a few who ship literally hundreds of pound of product out of state. Most of the "summer" folks spend their winter's some where in there lower 48, mostly Arizona..

That being said, we are all grateful that ADF&G is giving us a 2 and a half month opportunity to harvest a few spot shrimp to eat.



October 2, 2017

To: Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Re: EF-F17-067 Request for Board support for CFEC regulatory change

Dear Board Members,

In April of this year we submitted a proposal to allow existing Sitka Sound Sac Roe Seine permit holders to use open pound roe on kelp as an alternative to seining in the harvest of herring eggs from Sitka Sound. The proposal was similar to what was presented to the Alaska Board of Fisheries (Board) during the last cycle in 2014/15. As some of you may recall there is divergence on whether or not the Board had the statutory authority to act on the proposal. There seems to be a circular argument taking place: The Board cannot act on the proposal until Commercial Fisheries Entry Commission (CFEC) makes changes and CFEC will not make changes until the Board acts on the proposal. Interesting to note: The most recent letter indicates the Board cannot dictate gear used as opposed to the administrative area overlap which was previously believed to be the problem.

In continued dialogue with CFEC we continue to be told that CFEC will not act until the Board acts. This has been stated in virtually every memo and exchange the Board has had with CFEC regarding this situation. Why is the Board's council so staunch in an opinion which differs from CFEC's view? Why is it that folks involved in the same process, reading the same statutes, can't arrive at a similar conclusion?

The proposal in question encourages a change which would result in increased fishery value combined with a reduction in the amount of fishing mortality. To anyone tasked with resource management this is a win/win scenario. This proposal offers more value for less resource removal. Why shouldn't the Board have opportunity to approve or deny such a concept? Isn't this what the Board of Fisheries is for?

We have attached documents supporting our position that the Board should be able to act on our proposal. The proposal was never intended for, or submitted to, CFEC as CFEC has made it clear they wish the Board to present a position to them before they will propose regulation. Contrary to CFEC's opinion there is support from Sitka permit holders however; the support letters were submitted to the Board and not CFEC. We believe the proposal in question is a good idea which will improve a fishery. We believe the decision of whether the proposal is carried or fails should be left up to the Board of Fisheries. Please find a way for this proposal to be heard, debated, and decided by the Board.

Thank you for your time.

Regards,

Darrell and Ryan Kapp



THE STATE  
of ALASKA  
GOVERNOR BILL WALDEE

## Department of Fish and Game

BOARDS SUPPORT SECTION  
Headquarters Office

1255 WOOD BIRCH DRIVE

PO BOX 115294

ANCHORAGE, ALASKA 99511-5294

PHONE: 907-266-8111

FAX: 907-266-8112

[www.adfg.state.ak.us](http://www.adfg.state.ak.us)

August 2, 2017

Mr. Darrell Kapp  
338 Bayside Road  
Bellingham, Washington 98225

Subject: 2017/2018 Board of Fisheries Proposal Review

Dear Mr. Kapp:

On behalf of the Board of Fisheries (board) and Department of Fish and Game (department), thank you for submitting a proposal for consideration by the board in the 2017/2018 meeting cycle. Proposals accepted for the meeting cycle are in response to the Call for Proposal that was issued by the board in the fall of 2016. The call sought proposals for regulatory change in Title 5 of the Alaska Administrative Code specifically for finfish in the Prince William Sound Area including Upper Copper and Upper Susitna Rivers, finfish and shellfish in the Southeastern Alaska and Yakutat Areas, and Dungeness crab, shrimp, and other miscellaneous shellfish in all other statewide regions.


As part of the proposal review, the department looks to see if proposals are related to the regulations cited in the call, within the board's statutory authority to act, clear and understandable, and seeking regulatory change. There are occasions when proposals do not meet this baseline review and are not entered into the meeting cycle proposal book.

The proposal you submitted, EF-F17-067, seeks to create a herring pound fishery in Sitka Sound to allow existing herring sac roe permit holders the option of using either gear, or if board authority does not exist, express support for the concept to the Commercial Fishery Entry Commission (CFEC).

The board does not have the authority to determine which gear will be used by limited entry permit holders. As noted in your proposal that is under the authority of CFEC. The proposal will be added to the board's October 2017 work session work book in the event they care to take up the subject of expressing support to CFEC for this concept. If you would like to provide additional information to the board prior to that meeting, the due date for public comment is October 3, 2017.

Again, thank you for taking a personal interest and direct action in Alaska's fish and game management system.

Sincerely,

  
Glenn Haight  
Executive Director



Ryan Kapp RL100

## MEMORANDUM

STATE OF ALASKA  
COMMERCIAL FISHERIES ENTRY COMMISSION

TO: Alaska Board of Fisheries

DATE: January 12, 2000

Dan K. Coffey, Chairman  
Ed Dersham  
Larry J. Engel  
Grant Miller  
Russell Nelson  
Virgil L. Umphreus  
Dr. John R. White

PHONE: (907) 789-6160 VOICE  
(907) 789-6170 FAX

FROM: Commercial Fisheries  
Entry Commission

SUBJECT: Board Proposals 168, 175 and 174—  
Optional Open Pounding  
Alternative for the Southeast Roe  
Herring Seine Fishery (Sitka Sound)

Marlene Johnson, Commissioner  
Mary McDowell, Commissioner  
Bruce Twomley, Chairman

Board Proposals 168 and 175 would authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery. Board Proposal 174 opposes the change.

The Board previously considered this issue in January of 1997 (Proposal 441). Our comments at the time (coordinated with those of the Department of Law) remain current today. This memo is a recap.

Since our 1997 communications, (1) the Department has experienced managing the experimental, Sitka Sound open pound fishery authorized by the Board in 1997; and (2) the Board authorized a herring pound spawn-on-kelp alternative for Norton Sound herring limited entry permit holders (both gillnet and beach seine). 5 AAC 27.965.

If the Board were to act favorably on Proposals 168 and 175, the Board should be very clear its action affects only the existing, limited Sitka Sound roe herring purse seine fishery.

In turn, following favorable Board action on Proposals 168 and 175, CFEC would stand ready to propose complimentary changes to its regulations. To adopt such regulations after a public comment period, CFEC would be required to determine independently that the purposes of the Limited Entry Act would be served by doing so.

In particular, CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted. Compare 20 AAC 230(a) and 5 AAC 33.200(m)(2). CFEC would likely propose





modification of its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area included within the Board's definition of the Sitka Sound roe herring purse seine fishery.

In making and considering this proposal, CFEC would be guided by the Limited Entry Act, AS 16.43.200, which reads in relevant part as follows:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative areas reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

\* \* \*

The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

Generally, the Entry Commission would also be guided by AS 16.43.950, which, in relevant part, provides:

Nothing in [the Limited Entry Act] limits the powers of the Board of Fisheries, including the power to determine legal types of gear and the power to establish size limitations or other uniform restrictions applying to a certain type of gear. Holders of interim-use permits or entry permits issued under this chapter are subject to all regulations adopted by the Board of Fisheries.

Our regulatory procedure would allow us to meet our responsibility under the Limited Entry Act, and, additionally, help generate public awareness and comment (particularly from members of the public who believe they have interests under the limited entry system that should be addressed). Our procedure creates an opportunity for the commission to clarify potential ambiguity between regulations of the Board and of the commission. The commission must reserve judgment on the issue until it has received public comment.

Bruce Twomley plans to report to the Board on Saturday, January 15, 2000.

If the Board has additional questions during the following Board meetings, at least one of the following individuals will be available by phone at 789-6160: Bruce Twomley, Susan Haymes, or Kurt Schelle.

cc: Frank Rue, Commissioner, ADF&G  
Doug Mecum, Director of Commercial Fisheries  
Scott Marshall, Regional Supervisor  
Diana Cote, Executive Director, Board of Fisheries  
Stephen White, Assistant Attorney General



# MEMORANDUM

## STATE OF ALASKA

*Department of Law*

To: Glenn Haight  
Executive Director  
Alaska Board of Fisheries

Date: February 11, 2015

File No.: JU2014200582

Tel. No.: 269-5232

Fax: 279-2834

From: Lance Nelson  
Seth Beausang  
Assistant Attorneys General  
Natural Resources Section  
Department of Law

Subject: **Comments on Proposals for  
2015 Board of Fisheries  
Meeting on Southeast  
Alaska/Yakutat Finfish Issues**

The Department of Law has the following comments on the proposals to be considered by the Board of Fisheries at its 2015 meeting in Sitka on regulations for Southeast Alaska and Yakutat Areas finfish issues.

**Proposal 124:** This proposal would authorize equal share quotas for participants in the Sitka Sound sockeye herring fishery during years when 70% of permit holders voted in favor of such quotas. This is likely beyond the authority of the board. The board may not delegate its authority to decide how a fishery is prosecuted to anyone other than the commissioner or department, especially when there are expected to be individual fishers who do not favor the quota.

**Proposal 126:** This proposal would allow herring seiners to opt to use open herring pounds in lieu of their seine gear. Southeast Alaska herring pound limited entry permit holders are generally the only users who can participate in a pound fishery in their administrative area, not seiners. "Herring pound" is generally defined as "an enclosure used primarily to retain herring alive over an extended period of time." 5 AAC 39.105(d)(20). But in Southeast Alaska, a "herring pound" can include an "open pound" which is defined in 5 AAC 27.130(c)(2). The board likely does not have authority to allow additional users into this limited entry fishery without prior action by the Commercial Fisheries Entry Commission (CFEC).

**Proposals 131-134:** These proposals raise similar issues as in Proposal 126. There are already three permit holders in the Southern Southeast sablefish limited entry pot fishery, 20 AAC 05.320(e). The board likely does not have authority to allow additional users into this limited entry fishery without prior action by the CFEC.

**Proposal 148:** If the board authorizes community harvest permits, such permits could not be limited to residents of Hoonah or any other particular community.

**Proposal 155:** This proposal would allow "boat" or "party limits" for sport fishing rather than bag or possession limits that apply to individuals. One consideration



THE STATE  
of ALASKA

GOVERNOR BILL WALKER

RC 142  
Department of Fish and Game  
ALASKA BOARD OF FISHERIES

1255 West 18th Street  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Phone: 907.465.4119  
Fax: 907.465.6094

March 3, 2015

Bruce Twomley  
Chairman, Alaska Commercial Fisheries Entry Commission  
P.O. Box 110302,  
Juneau, AK 99811-0302

Subject: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Chairman Twomley:

During the 2015 Southeast and Yakutat Finfish meeting in Sitka this past week, the Board of Fisheries considered Proposal 126, which would allow Sitka Sound herring seine permit holders to utilize open pounds to harvest roe on kelp in lieu of their customary sac-rope herring seine gear.

You may be aware the Sitka Sound herring fishery value has declined somewhat over the past few years with the market price falling below \$200/ton.

Also, the Sitka Tribe has encouraged the Board to reduce open fishing area and diminish harvest levels.

In considering Proposal 126, the Board was intrigued that the open pound fishery might provide a potentially higher price-point product to the market.

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the Southern Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open pound gear as an alternative for sac-rope seine permit holders. The CFEC could then ratify that alternative gear for seine permits.

The Board was offered a variety of options by the Department of Law for action on Proposal 126 in light of the inability of the Board to pass the proposal as written, including passing the proposal contingent on eventual approval by CFEC. Not knowing whether or when CFEC might act, the Board found it difficult to craft appropriate language. The Board decided it was more appropriate for the proposer to approach CFEC for approval of this concept before the Board would take subsequent action and allow current seine permit holders the option of utilizing open pound alternative gear.



Commissioner Bruce Twomley

- 2 -

March 3, 2015

Accordingly, I am writing to inform you that the Board is open to further consideration of the proposal, and encourages the CFEC to assess the feasibility of acting to allow this fishery when approached by the proposer, Mr. Ryan Kapp.

You may already be aware of this concept as it has been before both the Board of Fisheries and CFEC over the years. We understand that CFEC may need a fair amount of time to make its determination.

Best Regards,

A handwritten signature in black ink, appearing to read "Tom Kluberton", followed by a horizontal line.

Tom Kluberton, Chairman  
Alaska Board of Fisheries

Attached: Proposal 126

CC: The Honorable Sam Cotten, Commissioner ADF&G



THE STATE  
of ALASKA  
GOVERNOR BILL WALKER

Commercial Fisheries Entry Commission

6000 Glacier Highway, Suite 500  
PO Box 110303  
Juneau, Alaska 99811-0303  
Phone: 907.785.5180  
Toll Free: 800.785.5158  
Fax: 907.789.0170

May 13, 2015

Tom Kluberton, Chairman  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Board of Fisheries Action on Southeast and Yakutat Finfish  
Meeting Proposal 126

Dear Chairman Kluberton:

I am sorry for the time that this response to your March 3, 2015 letter has taken. CFEC and I have had much more than the usual interruptions during the intervening period.

You called our attention to Board Proposal 126, which appears to be intended to authorize open pounding as an alternative means of harvesting roe herring in the Sitka Sound roe herring seine fishery.

An issue arising from the proposal is that CFEC's current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery includes the area in which the Sitka Sound roe herring purse seine fishery is conducted.

Your letter suggested the following approach:

The Board was advised by the Department of Law that the Board likely does not have authority to allow new entrants to limited entry herring pound fisheries without approval by the Commercial Fisheries Entry Commission (CFEC).

\* \* \*





A majority of the Board voted to again consider Proposal 126 next year if CFEC were to re-define the current administrative area for the [Northern] Southeast herring pound limited entry fishery to exclude Sitka Sound, where it appears no herring pound operations are currently authorized or have occurred there. The Board could then consider authorization of open gear as an alternative for sac roe seine permit holders. The CFEC could then ratify that alternative gear of seine permits.

I dithered over this a little bit, because I am accustomed to the Board first making a methods and means decision conditioned on subsequent independent regulatory action by the commission. However, there is at least a *prima facie* case for CFEC making a regulatory proposal that would modify its current definition of the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery to exclude the area within Board's definition of the Sitka Sound roe herring purse seine fishery. Because our administrative area definition includes another limited fishery subject to Board regulation, there is an argument that we have not fully met our statutory duties under the Limited Entry Act AS 16.43.200, which reads in relevant parts as follow:

The commission shall establish administrative areas suitable for regulating and controlling entry into the commercial fisheries. The commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries.

\* \* \*


The commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of [the Limited Entry Act].

We will develop and publish a regulatory proposal for public comment. Of course, we will have to reserve judgment, until we have heard all the public testimony, as to whether the proposal is or is not consistent with the purposes of the Limited Entry Act. I can think of



competing analyses, and I am not sure about where this proposal will end up. But we can ensure that all sides are heard and fairly considered.

By Direction of the  
COMMERCIAL FISHERIES ENTRY COMMISSION

  
Benjamin Brown, Commissioner  
Bruce Twomley, Chairman

cc: The Honorable Sam Cotten  
Commissioner, ADF&G



CFEC SITKA SOUND  
Modern



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Confirmation # 21784507  
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This is a public hearing on CFEC's regulatory proposal to modify CFEC's administrative area definition for the Northern Southeast herring spawn-on-kelp pound fishery.

Now I'd like to introduce fellow staff members sitting here with me. I have my Co-Commissioner (Benjamin Brown). We have our Law Specialist (Doug Rickey) and we have Head of our Research (Craig Farrington). And we are the folks in response to your testimony who are likely to be asking you questions. And so as we go forward if someone has a question if you'd just get my attention I'll acknowledge you for the record and so they know who's speaking.

Also before we begin I really want to extend a thank you to (Randy Lippert), (David Pierce), and (Ty McMichael) for helping make this work. You guys have done a splendid job. And we are also grateful to GCI and particularly (Julie Pierce) who has helped us through this process.

Now before we begin taking testimony I wanted to say just a few words about the procedure and our regulatory proposal to remove Sitka Sound from our administrative area of definition for the Northern Southeast herring spawn-on-kelp pound fishery. I mean, as you know, earlier board proposal 126 asked the Board of Fisheries to authorize open pounding as an alternative means for the Sitka Sound roe herring fishery.

Now proposal 126 is not at issue in this proceeding but it certainly was the catalyst for this proceeding and our proposal - the trigger that led to this hearing. And you'll notice that CFEC's proposal in front of you says nothing about proposal 126. Our proposal addresses only our area definition. And I wanted to tell you that we made this proposal for two reasons. And the first is that we were asked to do so by the Board of Fish and by the Department of





CFEC SITKA SOUND  
Madera



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Law. And that's unusual but that request had a certain amount of force. We like to be good colleagues and cooperate where we can. But there's a second reason and that's actually what prepared us forward to make this proposal.

We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 - Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries. And it further says that the Commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of the Limited Entry Act.

So, I mean, for us the question that was raised was why did we define the area for Northern (rolunt) kelp to include Sitka Sound in the first place. And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that. And of course the managers of Sitka Sound have never told us that they wanted to invite more participants in that fishery. It seems that there are plenty of demands there now.

And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute. We just didn't have a stated reason for having included Sitka Sound in that definition. And so we made this proposal and maybe you folks through your testimony can provide us with a sound reason for maintaining the definition or maybe not. It will - much of that will turn on your testimony.

But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126. And please note that however - whichever way CFEC decides on our proposal the Board of Fisheries could still take up proposal 126. And if the Board were to act favorably on proposal 126 then



CPEC SITKA SOUND  
Modern



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CFEC would have to review the Board's action for consideration of whether the Board's action was consistent with the purposes of the Limited Entry Act under Alaska Statute 16.43.4112. And the basic purposes for a Limited Entry that we'd have to have in mind are that Limited Entry is intended to serve conservation and prevent economic distress among fishermen and those depended upon them for a livelihood. That's the most basic standard we work with.

And another thing to keep in mind is that the Board has means and methods authority under Alaska Statute 16.05.251. In turn, the Limited Entry Act governing us Alaska Statute 16.43.950 declares -- and I'm paraphrasing -- nothing in the Limited Entry Act limits the powers of the Board of Fisheries including the power to determine the legal types of gear.

So the short of this proceeding is if the Board in the future acts favorably on Proposal 126 the Board's action will need to come back to CFEC and CFEC will have to determine whether the Board's action is consistent with the purposes of the Limited Entry Act to give it effect.

And so that's when CFEC will be called upon to address the merits. If this does come back to us of course you will all get notice -- anyone interested will get notice -- and have an opportunity to address the merits as well.

So I think we're ready to move forward with your testimony. And if you have questions I'd like you to raise the questions while you are testifying. And we're going to start first with a testimony of people who have traveled here and who are here in this room to testify to us. When we get through your testimony then we'll turn to the people who are lined up on the phone to give their testimony.



THE STATE  
of ALASKA  
GOVERNOR BILL WALDEE



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Commercial Fisheries Entry Commission

2000 Collins Highway, Suite 109  
P.O. Box 110302  
Juneau, Alaska 99811-0302  
Phone: 907, 586, 6180  
Fax: 907, 586, 6183  
Email: 907, 586, 6170

January 8, 2016

Tom Kluberton, Chair  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

After due consideration, the Commission has decided to take no further action on the proposal, as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.

When the Entry Commission considered a petition to limit the pound fisheries in Southeast Alaska in 1994, ADF&G Commissioner Carl Rosier sent us a memorandum regarding the Department's management and conservation concerns with the fisheries in the Hoonah Sound and Craig/Klawock areas. The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two



smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you and have any questions regarding this matter.

Yours Truly,  
Commercial Fisheries Entry Commission

Bruce Twomley, Chairman  
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)  
Sitka Tribe of Alaska  
Southeast Alaska Seiners Association





## MEMORANDUM

## State of Alaska

### Department of Law

TO: Glenn Haight  
Executive Director  
Alaska Board of Fisheries

DATE: March 4, 2016

FILE NO.: JU2015200517

FROM: Seth M. Beausang *SMB*  
Assistant Attorney General

TEL. NO.: 269-5289

SUBJECT: Department of Law  
comments on proposals  
for the March 8-11, 2016  
Statewide Finfish and  
Supplemental Issues  
meeting

The Department of Law has the following comments on the proposals to be considered by the Board of Fisheries at its March 8-11, 2016 Statewide Finfish and Supplemental Issues meeting:

**Proposal 126:** As we explained to the board last cycle, this proposal would allow Southeastern Alaska herring purse seine permit holders in Sitka to use open herring pounds in Sitka Sound in lieu of their seine gear. The Northern Southeast herring pound fishery is a limited entry fishery and includes Sitka Sound within the limited entry administrative area. In Southeastern Alaska, a "herring pound" can include an "open pound," which is defined in 5 AAC 27.130(e)(2). The board does not have authority to allow new entrants into the Northern Southeast herring pound limited entry fishery by allowing non-permit holders to use open pounds in the fishery. We understand from PC 16 that CFEC considered changing the administrative area of this limited entry fishery, in order to allow the board to act on this proposal, but that CFEC ultimately declined to change the administrative area. The board does not have the authority to adopt this proposal.

**Proposal 194:** Based on the statements in the proposal about the alleged impacts of trawl fishing on subsistence uses in this area, the board is encouraged to consider



		FISH AND GAME	SUPPORT	GENERAL COMMENT	OPPOSITION
126- 2014- 2015	Establish a commercial open pound herring spawn on kelp fishery in Sitka Sound. (Tabled at 2015 Southeast Finfish meeting for consideration at this meeting.)	N	<ul style="list-style-type: none"> <li>Edna Bay AC 25</li> <li>Alan Otness PC 5</li> <li>William R. Menish PC 9</li> <li>Ryan Kapp PC 14</li> <li>Gary Soydam PC 22</li> <li>Joe Lindholm PC 38</li> <li>Darrell Kapp PC 42</li> <li>Steve Feenstra PC 45</li> <li>Terry Kilbreath PC 49</li> </ul>	<ul style="list-style-type: none"> <li>CFEC PC 16</li> </ul>	<ul style="list-style-type: none"> <li>Sitka AC 17</li> <li>Wrangell AC 20</li> <li>Sitka Tribe of Alaska PC 2</li> <li>Clyde Curry PC 17/18</li> <li>Clyde Curry PC 18</li> <li>Don Johnson PC 19</li> <li>Joel Randrup PC 29</li> <li>Larry Demmert PC 30</li> <li>Southeast Alaska Fishermen Alliance PC 44</li> <li>United Southeast Alaska Gillnetters PC 52</li> </ul>
<b>Identification of Gear (2 proposals)</b> (This set of proposals was also heard at the Bristol Bay Finfish meeting where public testimony was taken.)					
27	Require that a CFEC permit holder's name displayed on a set gillnet site marking sign complies with the same character size marking requirements for permit numbers.	N	<ul style="list-style-type: none"> <li>Cooper Landing AC 11</li> </ul>		<ul style="list-style-type: none"> <li>Central Peninsula AC 6</li> </ul>
28	Change the character size requirements for set gillnet marking signs.	N			<ul style="list-style-type: none"> <li>Central Peninsula AC 6</li> </ul>
<b>Salmon (1 proposal)</b>					



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

Re; Support for writing letter to CFEC to Change the Boundaries taking out the Sitka Roe herring Seine area from the Northern Southeast herring spawn on kelp area

Dear Chairman Jensen and Board of Fisheries Members,

**Our Problem.**

1. Board of Fisheries writes letter to CFEC requesting CFEC to exclude Sitka Sound from the administrative area from the Northern Southeast herring spawn on kelp area.
2. CFEC has a hearing Nov. 6, 2015.
3. CFEC writes back to the Board "After due consideration, the Commission has decided to take no further action on the proposal as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery."

**What Happened?**

At the CFEC hearing, CFEC asked that the hearing not be about Proposal 126,<sup>1</sup> Allowing Sitka seiners the choice to do open pounding spawn on kelp instead of seining herring. We knew proposal 126 was not suppose to be the issue. We did not send the CFEC any information on the proposal nor did we feel and pressure to fight for our proposal because CFEC was not going to consider it in determining the area change. Testimony proceeded and as Mr. Twomley explains in his letter of January 8, 2016 to the Board of Fisheries "Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders."<sup>2</sup>

We believe the CFEC should have acted as Mr. Twomley states "We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 – Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries."<sup>3</sup>

We believe the CFEC overlapping the areas was arbitrary and caprices. Mr. Twomley states "And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that."<sup>4</sup> Commissioner Carl Rosier memorandum "The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all

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<sup>1</sup> This fact is in the transcript of the CFEC Sitka Sound hearing Bruce Twomley: page 2, "Now proposal 126 is not at issue", page 3 "But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126"

<sup>2</sup> Twomley letter to Board of Fisheries, January 8, 2016

<sup>3</sup> CFEC Sitka Sound hearing Bruce Twomley: page 3

<sup>4</sup> CFEC Sitka Sound hearing Bruce Twomley: page 3, p3



of Southeast Alaska, or two smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock”<sup>5</sup> The CFEC chose the larger area.

We thought the CFEC hearing would be about the area definitions and why the overlap. Questions should have been:

1. Sitka roe herring fishery was the first limited fishery. The Northern Southeast herring spawn on kelp fishery was later. Was it right to overlap the areas? Mr. Twomley states “And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute.”<sup>6</sup>
2. Do the areas defined represent the actual fisheries going on?
3. Does the Sitka herring roe seine permittee have the right to harvest the roe herring eggs?
4. Does the permit holder have a right to harvest the fish or does the gear?
5. Who has the right to the biomass, the permit holder that fishes the biomass or the gear holder in another area?

The Board needs to go forward with our proposal allowing the Sitka Seine permit holder the opportunity to harvest their share of the herring resource with open pounds instead of purse seine. Indeed the CFEC states “If however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fishermen would be consistent with the Limited Entry Act.”<sup>7</sup> We are not asking the Board of Fisheries to allow more effort into the Sitka roe herring fishery. We are asking the Board to allow those already in the fishery to use a different method to harvest their share of the resource. Please write the CFEC a letter requesting the CFEC to separate the Sitka Roe Herring area from the Northern Southeast herring spawn on kelp area.

Best regards,

Darrell Kapp

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<sup>5</sup> Twomley letter to Board of Fisheries, January 8, 2016

<sup>6</sup> CFEC Sitka Sound hearing Bruce Twomley: page 3, p4

<sup>7</sup> Twomley letter to Board of Fisheries, January 8, 2016





THE STATE  
*of* **ALASKA**  
GOVERNOR BILL WALKER



PC040  
3 of 9

Commercial Fisheries Entry Commission

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PO Box 110302  
Juneau, Alaska 99811-0302  
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January 8, 2016

Tom Kluberton, Chair  
Alaska Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126

Dear Chairman Kluberton:

As I indicated we would in my letter to you of May 13, 2015, the Entry Commission developed and gave public notice of a regulatory proposal to exclude Sitka Sound from the administrative area for the Northern Southeast herring spawn-on-kelp pound fishery [20 AAC 05.230(a)(9)].

In addition to the usual public notice, CFEC sent an individual notice to all permit holders in that fishery, the Southern Southeast herring spawn-on-kelp pound fishery, and the Southeast roe herring seine fishery, inviting them to send written comments or appear at a public hearing on the proposal that was held at the Entry Commission offices in Juneau on November 6, 2015. The public comment period closed on November 13, 2015.

After due consideration, the Commission has decided to take no further action on the proposal, as we believe the record at this point does not support a change in the boundaries of the administrative area for the pound fishery.

When the Entry Commission considered a petition to limit the pound fisheries in Southeast Alaska in 1994, ADF&G Commissioner Carl Rosier sent us a memorandum regarding the Department's management and conservation concerns with the fisheries in the Hoonah Sound and Craig/Klawock areas. The Commissioner made clear the department's preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two

smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock. The Entry Commission ultimately chose the first alternative and defined the Northern and Southern administrative areas as suggested in Commissioner Rosier's memorandum.

Nothing in our research or the public comment we received on this latest proposal convinces us that a change is needed at this time in the administrative area definition for the fishery that has been in place since 1995. If, however, the Board of Fisheries decides to go forward with Proposal 126 or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fisherman would be consistent with the Limited Entry Act. Without prejudging the issue, I must tell you that, based on the overwhelmingly negative public comment we received, proponents of such a change will have a significant burden of persuasion.

I have copied this letter by email to Glenn Haight and attached copies of all public comment we received (letters and emails), as well as an unofficial transcript of the public hearing we held in Juneau on November 6, 2015. Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to the adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders. It is also worth noting that not a single Southeast roe herring purse seine permit holder offered comment or testimony in favor of the proposal.

Please don't hesitate to contact me if you have any questions regarding this matter.

Yours Truly,  
Commercial Fisheries Entry Commission



Bruce Twomley, Chairman  
Benjamin Brown, Commissioner

CC: Permit Holders (G01A, L21A, & L21C)  
Sitka Tribe of Alaska  
Southeast Alaska Seiners Association

**CFEC SITKA SOUND PURPOSED REG.****Moderator: Bruce Twomley****November 6, 2015****7:51 pm CT**

**Operator:** Ladies and gentlemen thank you for standing by. Welcome to the CFEC Sitka Sound Purposed Reg conference call.

During the presentation all participants will be in listen-only mode.

Afterwards we will conduct a question and answer session. At that time if you have a question please press the 1 followed by the 4 on your telephone. If at any time during the conference you need to reach an operator please press star 0. As a reminder this conference is being recorded Friday November 6, 2015.

I would now like to turn the conference over to Bruce Twomley. Please go ahead sir.

**Bruce Twomley:** Thank you operator (Kalimer). This is Bruce Twomley and I'm the Chairman of the Commercial Fisheries Entry Commission. We are in the conference room of the Commission's offices in Juneau. As you noted it's Friday, November 6, 2015 and the time is 3:00 p.m.



This is a public hearing on CFEC's regulatory proposal to modify CFEC's administrative area definition for the Northern Southeast herring spawn-on-kelp pound fishery.

Now I'd like to introduce fellow staff members sitting here with me. I have my Co-Commissioner (Benjamin Brown). We have our Law Specialist (Doug Rickey) and we have Head of our Research (Craig Farrington). And we are the folks in response to your testimony who are likely to be asking you questions. And so as we go forward if someone has a question if you'd just get my attention I'll acknowledge you for the record and so they know who's speaking.

Also before we begin I really want to extend a thank you to (Randy Lippert), (David Pierce), and (Ty McMichael) for helping make this work. You guys have done a splendid job. And we are also grateful to GCI and particularly (Julie Pierce) who has helped us through this process.

Now before we begin taking testimony I wanted to say just a few words about the procedure and our regulatory proposal to remove Sitka Sound from our administrative area of definition for the Northern Southeast herring spawn-on-kelp pound fishery. I mean, as you know, earlier board proposal 126 asked the Board of Fisheries to authorize open pounding as an alternative means for the Sitka Sound roe herring fishery.

Now proposal 126 is not at issue in this proceeding but it certainly was the catalyst for this proceeding and our proposal - the trigger that led to this hearing. And you'll notice that CFEC's proposal in front of you says nothing about proposal 126. Our proposal addresses only our area definition. And I wanted to tell you that we made this proposal for two reasons. And the first is that we were asked to do so by the Board of Fish and by the Department of



Law. And that's unusual but that request had a certain amount of force. We like to be good colleagues and cooperate where we can. But there's a second reason and that's actually what prepared us forward to make this proposal.

We took a look at our statutory authorization to define administrative areas at our statute with is AS 16 - Alaska Statute 16.43.200 says that the Commission shall make the administrative area reasonably compatible with the geographic areas for which specific commercial fishing regulations are adopted by the Board of Fisheries. And it further says that the Commission may modify or change the boundaries of administrative areas when necessary and consistent with the purposes of the Limited Entry Act.

So, I mean, for us the question that was raised was why did we define the area for Northern (rolunt) kelp to include Sitka Sound in the first place. And we went back to our records, asked our staff to search through what we had, and we could not find a stated reason for doing that. And of course the managers of Sitka Sound have never told us that they wanted to invite more participants in that fishery. It seems that there are plenty of demands there now.

And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute. We just didn't have a stated reason for having included Sitka Sound in that definition. And so we made this proposal and maybe you folks through your testimony can provide us with a sound reason for maintaining the definition or maybe not. It will - much of that will turn on your testimony.

But the thing that I would like all of you to note is that our proposal does not address the merits of proposal 126. And please note that however - whichever way CFEC decides on our proposal the Board of Fisheries could still take up proposal 126. And if the Board were to act favorably on proposal 126 then



CFEC would have to review the Board's action for consideration of whether the Board's action was consistent with the purposes of the Limited Entry Act under Alaska Statute 16.43.4112. And the basic purposes for a Limited Entry that we'd have to have in mind are that Limited Entry is intended to serve conservation and prevent economic distress among fishermen and those depended upon them for a livelihood. That's the most basic standard we work with.

And another thing to keep in mind is that the Board has means and methods authority under Alaska Statute 16.05.251. In turn, the Limited Entry Act governing us Alaska Statute 16.43.950 declares -- and I'm paraphrasing -- nothing in the Limited Entry Act limits the powers of the Board of Fisheries including the power to determine the legal types of gear.

So the short of this proceeding is if the Board in the future acts favorably on Proposal 126 the Board's action will need to come back to CFEC and CFEC will have to determine whether the Board's action is consistent with the purposes of the Limited Entry Act to give it effect.

And so that's when CFEC will be called upon to address the merits. If this does come back to us of course you will all get notice -- anyone interested will get notice -- and have an opportunity to address the merits as well.

So I think we're ready to move forward with your testimony. And if you have questions I'd like you to raise the questions while you are testifying. And we're going to start first with a testimony of people who have traveled here and who are here in this room to testify to us. When we get through your testimony then we'll turn to the people who are lined up on the phone to give their testimony.





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

Re; Support for Proposal 112, Management of the Herring Row on Kelp Fishery in SE Alaska

Dear Chairman Jensen and Board of Fisheries Members,

**Harvest from the resource based on kelp blades is not accurate and allows overharvest. It's a guess at best.**

Kelp blades come in all sizes and shapes. Herring lay their eggs in different densities when spawning. Thus the measurement of extraction from the resource is not measurable using the number of kelp blades. The weight of herring spawn on kelp is a measurable metric.

The Alaska Department of Fish and Game did a study in Sitka and determined the percentage of harvest based on weight that represents the extraction from the herring biomass. This study was based upon the open pound experimental fishery conducted in 1998 & 1999. The regulations should now use weight, in the open pound fishery, as the determining factor for herring spawn on kelp harvest, not the number of blades.

Alaska had herring pound fisheries in many areas. All the areas were using the method of closed pounding. Today the biomass in all those areas, except one, is not sufficient to support a fishery. Only in Craig/Klawock is the fishery still going and the Department has tried to limit the pounds to 20, in 2017, because of the lack of the herring resource. Closed pounding is not the way to harvest herring spawn on kelp. Until a determination can be made of what the extraction from the resource is in the closed pound fishery, based upon weight, that method should be stopped.

Best Regards,  
Darrell Kapp



Submitted By  
Dave Gordon  
Submitted On  
12/28/2017 4:24:19 PM  
Affiliation  
Self

I am opposed to proposal 159 to ban spotter planes during open periods in the southeast salmon purse seine fishery. I am not aware of any widespread use of aircraft for the purpose of facilitating illegal harvest. If there is a spotter or two that are facilitating illegal activity they are a very small minority. On the contrary I believe that spotters likely deter illegal activity since most spotters, if they witness fishing in closed waters, might just as likely document and report illegal activity to the troopers.

The Southeast Alaska purse seine fishery area is a vast area with openings from Northern Chatham to Dixon Entrance. Seiners simply cannot afford the time to assess their best prospect for an opening. But even on a smaller scale, such as during an opening, spotters help seiners find open areas nearby where effort is light or nonexistent with surplus fish that might otherwise go unharvested and can have the added positive effect of reducing effort in over-crowded areas. One might think that flying the day before an opening is adequate but the picture can change dramatically hour to hour depending on the wind, tide, run timing or shifting effort.

Thank you for the opportunity to comment





Submitted By  
David Benitz  
Submitted On  
12/26/2017 8:55:36 PM  
Affiliation

I am writing in to voice my support for proposal 235. I have been involved with this fishery as a permit holder/boat owner since 1998. Before that I started crewing at the age of 12 on my grandfather's dungeness boat. I have some experience with this fishery. The current Southeastern Alaska Area Dungeness Crab Fishery Management Plan is flawed and not necessary. In 2013 the F&G closed the season a week early. There was very little effort that summer with most boats targeting salmon. Where I was fishing the stocks were very good. I was having one of the best seasons of my life. Lots of crab and no boats. At a minimum the early closure cost me 10,000 lbs and I was getting \$2.50 per lb that summer. 2017 was a disaster for me. Not for lack of crab but for the lack of fishing time. I have a small boat and do not require a large amount of crab to make a good living especially when the price is near \$3.00 per pound. What I do need is the four month season to make a living. Dungeness is my only fishery and I would like to keep it that way. The 3-S system that was in place prior to 2000 was working just fine and will still work today. Please take the time to seriously consider passing proposal 235. Thank You David Benitz



Submitted By  
David klepser  
Submitted On  
12/27/2017 11:26:49 AM  
Affiliation  
Commercial fisherman

Phone  
907-617-5148

Email  
[Boondockdave@live.com](mailto:Boondockdave@live.com)

Address  
PO Box 8946..... mailings  
5392 Densley Dr .....physical  
Ketchikan , Alaska 99901

Hello and thank you. My name is David Klepser I'm a life long Alaskan born and raised in Ketchikan. Commercial fishing is my life I've been doing it since 1977. These proposals will have significant hardship and costs.

Proposal 79 I oppose this

And should not be approved this has been thru B O F many times and there is not a clear scientific gain to this. A dead shrimp is a dead shrimp whether it is before it can have any eggs, no chance to hatch any eggs, or a chance to hatch some eggs. With the length of our fishery there is no advantage to this proposal. Citing another country's regulations does not make it right for another country just because someone else is doing it doesn't make it right for us.

Proposal 80. I oppose this

Adfg knows how many pots are in the water and they calculate by cpue's pots fished. This proposal is by design to make everyone just as inefficient as the proposer. This is about being vested in a fishery and being able to compete just because he doesn't want to be effective in his operation doesn't mean I should to.

Proposal 81. I oppose this.

I've fished shrimp for 32 yrs. this has been before the board before and has not passed. It adds adverse gear restrictions that not all could comply with. It adds substantial record keeping and logs that would be burdensome and time consuming in an already time restricted fishery. It would have a significant cost to fishermen to participate it could make things even more dangerous with gear implications. We already report to adfg pot lifts and cpue's within existing regulations. Soak times don't regulate shrimp size and citing another country's rules does not make it the right way.

Proposal 82...83...84 I'm opposed.

These all are "not in my backyard" proposals and reallocate.

Proposal 153 I oppose

This should have been withdrawn. The gill net fleet in district 1 does not dictate seine opportunity in district 1. On the contrary the seine opportunity does.

Proposal 154...169. I support

Proposal 148 I oppose

Gives sport / charter more access to kings while trollers who paid for these fish are cut out. This is re-allocative and a fish grab.

Proposal 140 I oppose

This is just another fish grab by the seiners at the expense of other user groups. It would give seiners complete access to 2 of the 3 tha's in southern southeast. It is allocative and would have a negative effect on the gillnet fleet. The seiners are grabbing as much as they can because they know the next time the board meets they will be in or over their range with new chum productions that are starting to enter the fisheries.

Proposal 145. I oppose

This is another fish grab by the seiners and would be devastating to the gillnet fleet. Naket is the only gillnet only tha in southern southeast. The seine fleet has received in part or in whole all of ssraa increases in chum production for the last 15 years. The ssraa board of directors made this a gillnet only and paid the seiners with increased production for their offset. The rule that they'd only fish once a week is trivial as the seiners would only need one or two days to harvest the whole return and leave nothing for the gillnet fleet. I was there when they did this at Naket. seiners harvested close to 3.5 million lbs in one day at Neets Bay. All this seine grab for fish is happening because

they know come next board cycle they will be in their range if not over it . Naket is and should still remain gillnet only regardless of PC043 allocation . Seiners signed off on the new production increases for them and none for Gillnet. Thank you for your service to this great state . Sincerely yours David Klepser Ketchikan Alaska 99901 907-617-5148





Submitted By  
David Landis  
Submitted On  
12/28/2017 11:42:39 AM  
Affiliation  
Self

Phone  
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Email  
[davidflandis@icloud.com](mailto:davidflandis@icloud.com)  
Address  
10451 Kingfisher Road  
Ketchikan, Alaska 99901

Chairman Jensen and members of the Board of Fisheries,

Thank you for the opportunity to make public comment. I am a resident of the State of Alaska and have actively participated in sport, commercial and personal use fisheries here since my youth in the early 1970s.

My remarks are regarding the *DRAFT: McDonald Lake Sockeye Salmon Stock Status and Action Plan, 2018*.

I have participated in the personal use gillnet fishery in Yes Bay fishing for McDonald sockeye nearly every year for approximately the past 15 summers. It is a tremendously enjoyable activity for myself and my sons, who look forward each year to our Yes Bay trip. Sometimes we have done well catching sockeye, sometimes not so well, but we always enjoy getting out.

The point I would like to make is that even though I very much value this fishery and it's been part of my life for many years, I don't think that the McDonald Action Plan Action #2 Personal Use Fishery goes far enough with the two options (A and B) presented. **I believe that there should be an Option C that suspends personal use altogether while there is a stock of concern.** My reasoning follows:

- 1. These are 100% brood fish.** This is the last stop before making it up Wolverine Creek and into McDonald Lake. This is the last chance to make escapement, and we're going to allow people to harvest virtually at the mouth of the stream? It makes no sense when the stock is as weak as it is currently. Every fish taken in this fishery leaves fewer eggs in the gravel upstream - guaranteed.
- 2. This is not the highest and best use for these fish.** Commercial fishers in Districts 1, 2, 6 and perhaps others may be restricted on fishing time and area as a result of the McDonald Lake management concerns. To reduce fishing time and area for other targeted species and stocks, both wild and enhanced as a result of potential McDonald sockeye interception is a poor use of the resource. There is far more impact to these fishers' livelihoods in the balance than the loss of a small personal use fishery at Yes Bay.
- 3. This is not a necessary personal use fishery.** I am very familiar with the local residents who utilize this fishery, and for the most part they are not feeding themselves hand-to-mouth with these fish as a critical food source. Although some might view it differently, I submit to you that this is a hobby fishery and a luxury at that. It takes a certain means to get to Yes Bay and set a personal use net for several days running, and on a cost-per-pound basis these are actually very expensive fish for the average person. I agree wholeheartedly that there should be places for personal use fishing by those who it impacts the most, and who really need it, but this is not that kind of a fishery in my opinion.

Again, thank you for the opportunity to make these comments, and good luck with your meeting.



## Alaska State Board of Fisheries – 2018 – SE Finfish

Comments submitted by Deborah Lyons, 12-28-2017

### Dear Members of the Board of Fisheries,

I respectfully submit these comments for your consideration. There are 4 comments and they are organized by topic according to the regulatory authority of the Board. I have great respect for the Alaska Department of Fish and Game and especially praise the ADFG staff that serve on the Chinook Technical Committee in Pacific Salmon Commission process, as well as the many other technical and management personnel that work in the Pacific Salmon Treaty arena, as well as in the day-to day-management of SE Alaska fisheries. The Treaty is a hostile, contentious, and demoralizingly depressing process at times, and all of the Alaska participants, ADF&G staff, the industry panels, and committee members have shown admirable loyalty and stick-to-it-ness in the most trying circumstances. The comments I offer are meant to be supportive and constructive.

My name is Deborah Lyons, my husband David is retired from longlining and trolling. David was born in Petersburg but we have lived in Sitka since 1988. We own the troller/long liner F/V Kraken. I fished with David for fourteen years, from 1985 – the year Alaska entered into the US Canada Salmon Treaty - until 1999, the year the first ten year annex to the Treaty was signed, when the change to abundance based management was made.

I served as a member of the Board of Fisheries from January of 1990 to April of 1993. During that time the Board modified 47.145.055 the SE AK King Salmon Management plan and 5AAC. 29.060 Allocation of King Salmon in SE and Yakutat Areas. The Allocation plan was based on the annual number of Chinook available as determined under the sharing arrangements of the US-Canada Treaty. I was the Pacific Salmon Commission Northern Panel member representing trollers from 1995 through 1999. I was the Executive Director of the Pacific Salmon Treaty Coalition Public Relations and Education Committee from 1996 through 2000. I was the Executive Director for the resurrected Pacific Salmon Treaty Coalition from Jan 2016 through October 2017. I am currently the Secretary/Treasurer of the NSRAA Board of Directors and have served on that Board since 1995. I am currently the Executive Director of the Chinook Futures Coalition.

**Comment Topic #1 - Mark-Selective Fisheries on Hatchery Chinook** salmon in the waters of Southeast Alaska during summer troll fishery. .... **Page 2**

**Comment Topic #2 - 2017 ADF&G Treaty Commissioner's decision** to eliminate the harvest of 30% of the summer troll quota, approximately 31,000 Chinook salmon. ... **Page 4**

**Comment Topic # 3 – Delay the opening of the summer troll fishery** from July 1 to Jul 8. Weigh impacts on ADF&G ability to develop in-season verification of pre-season abundance estimate. ....**Page 12**

**Comment Topic # 4 – The cumulative affects of reducing troll Chinook effort** in spring and winter troll fisheries may generate (20,000 to 40,000 estimate) of Chinook available to be harvested in the summer troll fishery. Will the allocation goals be met? .....**Page 13**



**Comment topic #1:**

Mark-Selective Fisheries on Hatchery Chinook salmon in the waters of Southeast Alaska

**Regulatory Authority of the Board of Fisheries:**

Title 5 of the Alaska Administrative Code

- I. “Alaska Salmon Hatchery and Enhancement Regulations Chapter 40. Private Nonprofit Salmon Hatcheries 5 AAC 40.005. General
  - (a) The harvest of salmon inhabiting the water of the state, regardless of whether the salmon are naturally or artificially propagated, may be conducted only pursuant to regulations adopted by the Board of Fisheries.”

**Comment:**

Dear Members of the Alaska State Board of Fisheries,

**No Proposal in the Boardbook** - I am very troubled by the fact that the ADF&G conducted mark-selective fisheries (MSF) targeting Alaska and non-Alaska origin hatchery salmon in Southeast Alaska power troll fishery for two years (2015 & 2016) prior to the SE Finfish meeting, but the ADF&G did not submit proposals to the Board of Fisheries. Therefore, this new and controversial type of management in the Chinook fisheries is not subject to scrutiny by the BoF and further analysis from the ADF&G. Fishermen have concerns about the practice of mark-selective fisheries and have been deprived of their opportunity to share their experiences with the program with the Board of Fisheries through the standard Board process. There is no public notice about the mark selective fisheries; Advisor Committees have not been notified to review and debate the programs and to submit their comments to the BoF. The Aquaculture Associations could be impacted because they would be the ones that would have to mass mark their Chinook salmon production (remove the adipose fin of all Chinook fry prior to release). The AA's have not been able to participate in a discussion of whether these programs are economically and/or practically feasible at their facilities.

These MSF fisheries were not incorporated as part of the 2016 SE AK Summer Troll fisher management plan but were conducted under some sort of EO authority...I am not sure exactly what type of authority was granted to the Commissioner. The decision to conduct the MSF was not made at the level of the regional manager but from the Commissioner's office. Then, in 2017, the intention to conduct mark selective fisheries is stated within the SEAK Summer Troll Fisheries Management Plan. and a fishery targeting marked Chinook was allowed after the directed fishery for king salmon in July was closed. So, for a time during the directed 2017 Coho fishery, the retention of fin clipped king salmon was allowed. Clearly the ADF&G is anticipating that there may be some useful application of the MSF in the summer troll fishery. Why then did the Commissioner's office neglect to publish a proposal for review?

**Abrogation of the State's management authority** – Chapter 3, the Chinook Chapter of the Pacific Salmon Treaty, paragraph 5, Section 3 on page 65 explains the relationship of the international Treaty agreement with fisheries managed by the State of Alaska. “(c) mark-selective fisheries implemented by either Party that affect stocks subject to the Pacific



Salmon Treaty will be sampled, monitored and reported in accordance with applicable protocols recommended by the Selective Fisheries Evaluation Committee and adopted by the Commission; and the SFEC will facilitate the annual exchange of information regarding the conduct of mark-selective fisheries, including estimates of catches of mass-marked hatchery Chinook.” In other words the Treaty requires that if a party to the Treaty chooses to implement MSF, reports and evaluation of impacts on Chinook salmon stocks subject to the treaty must be made to the SFEC. My concern is that some of the current ADF&G PSC negotiating team may believe that MSF and mass marking programs are conducted under the authority of the Salmon Commission rather than the BoF, and can be adopted into SEAK fisheries management by incorporating MSF into the Treaty negotiations. If it is agreed at the Treaty talks that Alaska will be part of a coast wide mass marking and mark-selective fisheries program, then Alaska would have to adopt these fisheries and programs to complete our part of the bargain to reach an agreement at the Treaty. This seems very wrong to me, like the cart is in front of the horse.

Why would the State of Alaska agree to take part in a Treaty that sidesteps our legislatively mandated regulatory process? Back in the late 90’s the philosophy and posture of the Alaska Treaty negotiators was; “We are working within the Pacific Salmon Commission with the support and involvement of the Alaska fishing industry representatives, to get the best allocation of fish possible to the State.” In the case of Chinook, once the annual allocation of Chinook is determined through the Treaty Chinook Technical Committee, that number of fish goes to the State domestic regulatory authority; the Board of Fisheries. The Board of Fisheries decides how the All-gear Chinook Quota is allocated among the user groups, through the various allocation and management plans. The State negotiators, in those days, vigorously resisted attempts by other entities to interfere with the State management under the Board of Fish. And certain parties to the Treaty were proposing mark-selective fisheries for application in Alaska at that time as well. The Pacific Salmon Commission process recommends a number of Chinook to be harvested by Alaska but is up to the State process to distribute the harvest according to the State’s conservation and management goals. In Washington and Oregon the amount of Chinook allocated under the Treaty is divided in the Pacific Management Council process and then further regulated by the States and Tribes. The Canadian Department of Fisheries and Oceans in communication with the managers in British Columbia also insist that once the Chinook number is decided that they are allowed to conduct fisheries to meet domestic allocation and conservation objectives.

Dear Board of Fisheries members, I hope you thoroughly investigate the question of the State’s management authority with respect to the US/Canada Treaty, and provide appropriate guidance and clarification on the issue.

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**Comment topic #2:** 2017 ADF&G Commissioner’s decision to depart from the Summer Troll Fishery Management Plan and to eliminate the harvest of 30% of the summer troll quota, approximately 31,000 Chinook salmon.





## **Regulatory Authority of the Board of Fisheries:**

State of Alaska Administrative Code, Title 5, Chapter 29 Salmon Troll Fishery.

### **Comment:**

Dear Members of the Alaska State Board of Fisheries,

An exceptional action was taken in the Summer Troll fishery in 2017 and was announced to the public in the following Press Release:

*August 7, 2017, JUNEAU — Due to poor ocean survival conditions for Chinook (king) salmon, which are persisting in Southeast Alaska and British Columbia, extreme management measures are necessary to restrict harvests in coast wide fisheries that are directed at stocks originating in Southeast Alaska, Northern British Columbia, the Fraser River, and the Washington Coast.*

*In season information from ADF&G, the Canadian Department of Fisheries and Oceans, and NOAA surveys off the coast of Oregon, Washington, and the Gulf of Alaska all indicate that poor production conditions are currently occurring and will persist through at least 2018. In particular, Southeast Alaska and British Columbia stocks are experiencing historically low production; many of the affected stocks will not meet escapement goals or management objectives in 2017.*

*The in season data and stock specific information cannot be ignored when conservation of wild stocks is the foundation of the Alaska Sustainable Salmon Fisheries Policy and the Pacific Salmon Treaty. Therefore, it is imperative that Alaska offer relief now for these stocks, with a focus on protecting future production.*

*Although it is a very difficult decision to make, retention of Chinook salmon will cease at 12:01am, Thursday, August 10, 2017, in the Southeast Alaska recreational and commercial fisheries and non-retention will continue through September. Information on the status of stocks is still being collected and will inform management decisions beyond the September time frame.*

Fishermen, processors and the public were shocked to hear conditions were so dire that these extraordinary actions were required, but generally commercial and recreational fishermen accepted that if the ADF&G said a closure was needed there must be a rationalization that would justify the action. Trust in the integrity of the ADF&G was high. Nevertheless fishermen familiar with the life cycle of the SEAK King salmon systems were puzzled. The smaller SE AK King salmon systems like the Unuk and Chilkat are surveyed for peak escapements August 15<sup>th</sup>. Spawning fish returning to these systems were already in the rivers and would not be present in any significant amount in the August Troll fishery. After being pressed to provide a more detailed rationalization for the closure the Commissioner's office issued the following statement. I have five main concerns with the Commissioner's rationalization to bring to your attention. The bold italicized quotes are from the body of the Commissioners August 18<sup>th</sup> rationalization for the closure. Briefly, they are as follows:





***(1) Provided below are current 2017 spawning escapement assessments for the 11 Chinook salmon index systems in Southeast Alaska.***

There is no doubt escapements are very low but the ADF&G action of closing the August fishery troll fishery infers some significant contribution to the escapements of the listed AK systems and that escapements would improve. However, an analysis of the benefits of the closure to the SEAK systems has not been published by the ADFG, and independent analysis has shown very little benefit in terms of number of spawners saved that accrued to the SEAK systems. In other words the closure did not provide any substantial benefits to the SEAK systems. The closure resulted in a foregone harvest of 31,000 Chinook valued at over \$3.5 million dollars ex vessel, \$6 Million dollars first wholesale and even greater when economic multipliers are factored in. (Informal Seafood Producers Cooperative preliminary estimate) Furthermore, the 8-18-17 rationalization refers to the State of Alaska Policy for the Management of Sustainable Salmon Fisheries. The ADFG knew a BoF workshop was scheduled for October to decide if SEAK stocks met the criteria for a stock of concern. From my point of view, as a member of the public, and from the point of view of many troller, fishermen would have preferred that the SSFP policy proceed as written. First a determination is made, and then an action plan is developed in an open public process. Instead the ADFG pre-empted the SSFP process.

***(2) Provided below is current 2017 abundance information for Chinook salmon that return to Northern British Columbia and the Fraser River.***

Low escapements to Canadian Rivers are cited, as if Alaska has a conservation responsibility to those systems in addition to what has already been provided to Canada through reductions already made to the amount of king salmon available for harvest in SE Alaska in 2017.

Did you know that the amount of King salmon available to be harvested in Southeast Alaska is set each year according to a table and formula developed by the Pacific Salmon Commission and the Treaty process? For 2017 the SE Alaska All-gear Treaty Quota was 209,700 King salmon. The formula used to set that number predicts King salmon abundance through the use of an Abundance Index (AI). For 2017 the AI was 1.27. In other words, king salmon were estimated to be 27% more abundant in 2017 than in the period before the Treaty was signed. (1979-1982)

Most people know that most of the king salmon caught in Southeast Alaska are not fish returning to Alaska streams but are king salmon returning to rivers in Canada and Washington. When Alaska entered into the Treaty to help rebuild king salmon the State agreed to reduce Southeast Alaska historic harvest share by about 20%. During the early years of the Treaty, from 85-99, Alaska's harvest was a fixed number and was called the "ceiling fishery".

In 1999 a change to abundance-based management was made and the State Treaty negotiators agreed to an even greater reduction in harvest share. The new formula calculates harvest share on a sliding scale. The minimum reduction in year of greatest abundance is 45%. In years of lowest abundance the reduction is 63% from our historic share of the coast wide king salmon harvest. **In 2017 the number of king salmon**



**allocated to SE Alaska (209,700) represents a 49% reduction in harvest share of king salmon.**

When the PSC moved to abundance-based management the Alaska (AABM) Aggregate Abundance Based Management reduction in harvest would now fulfill Alaska's obligation to contribute to conservation for the other Canadian and Southern US fisheries. Once Alaska made its reduction in harvest, the responsibility to achieve escapements is the responsibility of the other more terminal fisheries adjacent the Nass, Skeena and Fraser. There was no request from Canada asking that Alaska eliminate the August fishery to provide additional conservation benefits to them. The fact that the Alaska Treaty Commissioner took it upon himself to arbitrarily decide to eliminate the harvest of 31,000 Treaty fish, when nothing in the Treaty required him to do so, is extremely disturbing.

### ***(3) Genetic Stock Composition***

***Historic genetic-based stock composition data provide information for various aggregates of Chinook salmon stocks that have contributed to the harvest in Southeast Alaska in prior years...***

***(5) However, genetic stock composition estimates are available in-season for the Northern British Columbia summer troll fishery and information gathered in 2016 and 2017 suggests very large differences in these years...***

The Commissioner cites recent genetic data from genetic sampling in Alaska and genetic stock identification from data gathered in the North British Columbia power troll fishery as if it is significant and warrants a change in Alaska's fisheries' management.

Stick with me Board members, it is late I am tired, (12:52 AM), comments are due tomorrow but this is really important.

**The entire Southeast Alaska Sport and Commercial Chinook stock composition is of mixed stocks from Alaska, Canada, Washington and Oregon.** This is not exactly a news release in and of itself!!! It is the reason why we are in an International Treaty.

"The Government of the United States of America and the Government of Canada,  
Considering the interests of both Parties in the conservation and rational management of Pacific salmon stocks and in the promotion of optimum production of such stocks;  
Recognizing that States in whose waters salmon stocks originate have the primary interest in and responsibility for such stocks;  
Recognizing that salmon originating in the waters of each Party are intercepted in substantial numbers by the nationals and vessels of the other Party, and that the management of stocks subject to interception is a matter of common concern;  
Desiring to cooperate in the management, research and enhancement of Pacific salmon stocks;  
Have agreed as follows:"

And we were off to the races in 1985!

Alaska has been in the Treaty since 1985. During how many years did the stock composition change? The correct answer is, "It changes every year." With periods when the Columbia River stocks dominate, but that changes to West Coast of Vancouver Island stocks, or maybe Thompson stocks because of the hatchery programs. Just as some stocks are more present (Stronger) and other stocks less present (Weaker) the one constant is that the composition will change. Hence the concept that the Alaska Chinook All-gear quota that comes from the Treaty is based on Aggregate Abundance of Stocks...how could it be otherwise? SEAK Chinook Stock composition is not a pie, it is a mosaic seen through a kaleidoscope and it changes each time you look at it.

Canada also receives Treaty Chinook quotas based on the Aggregate Abundance of stocks. Different from Alaska, Canada North British Columbia management has gone way down the road of shaping the Canadian troll fishery to harvest or avoid harvesting their own stocks, while at the same time "attempting to harvest the (Treaty) allocation". Canadian trollers also own Individual Transferable Quota shares of Chinook and can harvest them in various areas of Northern and Southern BC at various times.

Check out the report on the PSC website above. The title is, "Genetic Stock Identification of Chinook Salmon caught in Northern British Columbia Troll Fisheries 2016"

<http://www.psc.org/publications/fund-backgrounders-final-reports/#449-information>

Is there a problem with Canada moving their troll fleet hither and yon based on scale samples in season? Not really. That is their domestic management choice to achieve allocation and conservation goals.

When the 1999 Treaty Chapter 3 on Chinook Management changed from ceiling to abundance-based management occurred some important supporting agreements and understandings accompanied the change in management.

- 1.) Alaska agreed to increase the reduction in historic harvest share of coastwise Chinook from 20%, as under the ceiling fisheries, to a sliding scale of 30% reduction in highest abundance years to 45% reduction in lowest abundance years. In 2008 the State agreed to (was forced to accept) an additional across-the-board reduction of 15% to the State's historic harvest share. Aggregate Abundance Based Management (AABM)
- 2.) The more terminal fisheries in CA, WA and OR agreed that they would be responsible to achieve MSY escapement goals for Chinook indicator stocks, even if they had to take a reduction even greater than the 35% harvest reduction, they had previously agreed to. Individual Stock Based Management (ISBM)

Therefore the AABM and ISBM had clear responsibilities to provide benefits for the rebuilding programs: AABM's donate fish to escapements and ISBM's manage terminal fisheries to achieve escapements. They would operate independently, each satisfying their "Treaty obligation".

- 3.) To help settle Canadian Equity claims and to enshrine the new understanding to stop the squabbling between the ISBM and AABM sibling fisheries, the US Government gave



\$170 Million dollars to establish the Northern Fund (\$75M) and the Southern Fund (\$65M). Canada could apply to each, Alaska to the N Fund and WA/OR to S Fund.

“The Pacific Salmon Commission oversees two Endowment Funds established in 1999 to support projects in Canada and the United States that develop improve information for resource management; rehabilitate and restore marine and freshwater salmon habitats; and, enhance wild stock production through low technology techniques.”

4.) The 1999 agreement met the standard of a “No Jeopardy” finding from NMFS and the threat of fisheries closures under the ESA was extinguished

5.) North –South sharing and legal threats under US vs. WA and Baldridge were held in abeyance.

So then we had peace. That lasted 10 years.

In 2008 an additional 15% was wrested from AK. NMFS and the Tribes rattled their sabers once again about ESA closures and possible Tribal legal actions against Alaska. A argumen could have been made that the N Fund and S Fund should revert to the Treasury if the 1999 Agreement was substantially altered. Federal funding is like crack cocaine and Alaska did not have any presence in WA DC for the AK negotiation team and the AK Congressional Delegation had lost influence after the death of Senator Stevens. On October 6, 2016 the Alaska Treaty team resumed their communications with the Alaska Congressional Delegation who wrote the State Department and Department of Interior a 10-page letter detailing Alaska’s problems with the 2008 agreement; the reallocation of Alaska’s 15% reduction to harvest in other fisheries rather than to escapements, current problems with the Chinook model, misbehavior by NMFS at the Treaty, etc. The ADF&G did an excellent job of documenting Alaska’s concerns in that document.

Here we are today, 18 years after the 1999 Agreement. The Genetic Stock Identification (GSI) data paid for by the Northern Fund and the Alaska stock GSI data paid for, in part, by the Northern Fund are being used by Alaskan scientists and Treaty Commissioners to justify further reductions in the Alaska share of the Coastwise Chinook harvest because we have forgotten the basic understanding that Alaska’s huge reduction in historic harvest share (49%) satisfies Alaska’s Treaty obligations.

Senator Stevens would roll over in his grave and those of us that labored the four tumultuous years to get the 1999 agreement feel like jumping off a bridge... For what? It appears we have lost our compass and our rudder! It should be noted that Chapter Three does anticipate and provide an additional mechanism to reduce AK AABM harvests if ISBM stocks fall chronically short of escapements. In order to further reduce AK harvest share the “weak stock gates” must be met. However this rather rigorous standard and criteria was not applied prior to the action being taken to close the August fishery.

Finally:

***(4) when this retention period was allowed to take place.***



This little sentence really bugs me...Should not it read, "When the 2<sup>nd</sup> retention period occurred according to the direction provided by the BoF in the Southeast Summer Troll Fishery Management Plan?"

Dear Board of Fisheries members, thank you for slogging through this long comment. The complete rationalization by the Treaty Commissioner, published in the ADF&G Press Release of August 18, 2017 is reproduced below for your reference.

### **BASIS FOR THE SOUTHEAST ALASKA CLOSURE TO CHINOOK SALMON RETENTION**

August 18, 2017

The following is a summary of considerations associated with the management of Southeast Alaska Chinook salmon fisheries in August 2017. Factual information considered includes numeric and compositional stock specific assessment data, fishery stock composition data from genetics, and NOAA juvenile surveys. Relevant obligations under the State of Alaska Policy for the Management of Sustainable Salmon Fisheries and the International Pacific Salmon Treaty (PST) were considered. Further, there was consideration taken for any spring-run Chinook salmon stocks such as those that spawn in Southeast Alaska that would be harvested in August and September of 2017 and are potentially components of the 2018 and 2019 spawning runs.

#### **Stock-Specific Escapement Assessments**

Preliminary spawning escapement estimates are available for 9 of the 11 Chinook salmon index systems in Southeast Alaska, for the Nass and Skeena rivers in Northern British Columbia, and for early run-timed stocks returning to the Fraser River. Abundance of these stocks in 2017 is very low, and for the Southeast Alaska stocks in particular, runs since 2016 are the worst on record. In 2016, of the 11 index systems in Southeast Alaska missed their respective spawning escapement goals. Preliminary information in 2017 suggests that 8 of 9 index systems surveyed to date in Southeast Alaska will miss their respective spawning escapement goals. At this time, Chinook salmon runs to Southeast Alaska streams are either the worst on record or on par with the disastrous runs seen in the mid-1970s.

***(1) Provided below are current 2017 spawning escapement assessments for the 11 Chinook salmon index systems in Southeast Alaska.*** (Bold, numeral and italics added – DAL)

- Situk River – Count through Situk weir of 1,200 large Chinook salmon, above the upper bound spawning escapement goal of 1,050 fish.
- Alsek River - Preliminary information suggests the spawning escapement will be below the lower bound of the goal.
- Chilkat River - Preliminary mark-recapture estimate is less than 1,200 large fish, well below the lower bound of the spawning escapement goal of 1,750 fish.
- Taku River - Preliminary mark-recapture estimate is around 7,000 large fish, less than half of the lower bound of the spawning escapement goal of 19,000 fish. All data suggests this will be the lowest escapement in over 40 years of detailed spawning escapement information, lower than the extremely poor runs seen in the mid-1970s.
- King Salmon River – Final spawning escapement is 85 large Chinook salmon, well below the lower bound of spawning escapement goal of 120 fish.
- Stikine River – Preliminary CPUE-based spawning escapement estimate is less than 10,000 large fish, well below the lower bound of the spawning escapement goal of 14,000 fish. All data suggests the lowest escapement in over 30 years and similar to the very poor runs seen in the mid-1970s.
- Chickamin River – Preliminary information suggests the spawning escapement will be below the lower bound of the goal.



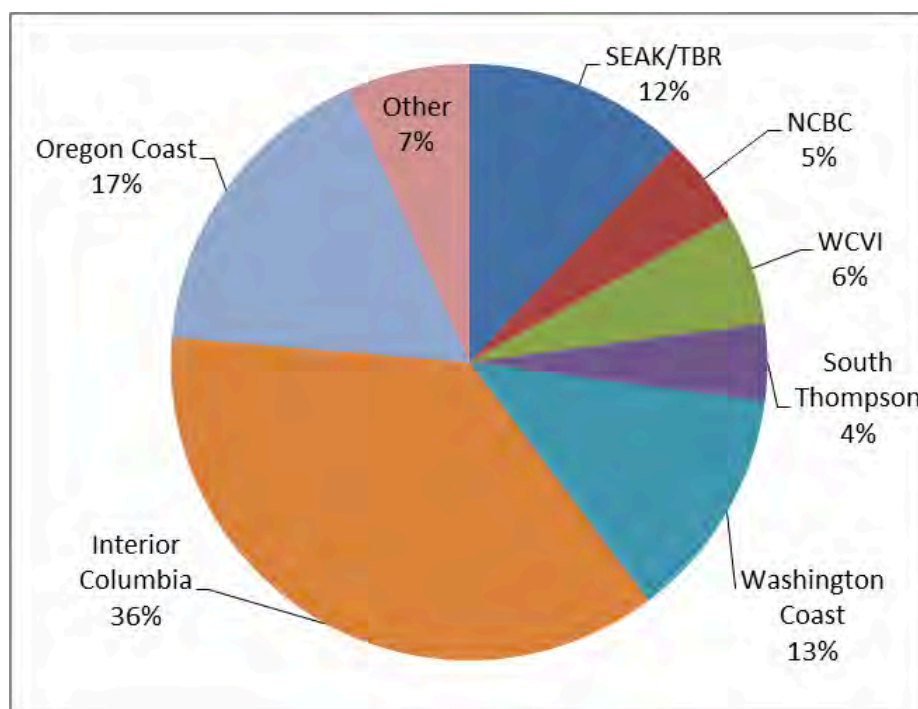
- Unuk – Preliminary information suggests the spawning escapement will be below the lower bound of the goal.
  - Keta River – Spawning escapement information is gathered beginning in mid-August.
  - Blossom– Spawning escapement information is gathered beginning in mid-August.
- (2) Provided below is current 2017 abundance information for Chinook salmon that return to Northern British Columbia and the Fraser River.*** (Bold, numeral and italics added – DAL)
- Nass River– Fish wheel index program suggests the run is about 25% of the average seen by mid-August.
  - Skeena River– Tyee test fishery suggests the run is about 25% of the average seen by early August.
  - Fraser River– Albion test fishery information is the poorest ever observed and is a very small fraction of the historic average values seen by mid-August.

### ***(3) Genetic Stock Composition***

***Historic genetic-based stock composition data provide information for various aggregates of Chinook salmon stocks that have contributed to the harvest in Southeast Alaska in prior years.*** (Bold, numeral and italics added – DAL) Average proportions of these data are provided in Figure 1 for the Southeast Alaska commercial troll fishery during the 2<sup>nd</sup> Chinook salmon retention periods from 2009 through 2016, ***(4) when this retention period was allowed to take place.*** (Bold, numeral and italics added – DAL) No 2<sup>nd</sup> retention period occurred in 2013 and 2015). When opened, the 2<sup>nd</sup> retention period typically occurred between mid-August and early September. Figure 2 provides similar information concerning average contributions of various aggregates of Chinook salmon stocks to the Southeast Alaska sport fishery operating from early July to early September along the outer coast (Outside Area) from 2009 to 2016.

Various natural and hatchery-origin Chinook salmon that originate in the Interior Columbia stock aggregate, the Oregon Coastal stock aggregate and the Washington Coast stock aggregate were the largest average contributors during the 2<sup>nd</sup> troll retention period in these years. Significant variation in contributions to SEAK fisheries occurs each year.





**Figure 1** – Average proportional contributions of various aggregates of stocks to the Southeast Alaska commercial troll fishery during the 2<sup>nd</sup> Chinook salmon retention period, 2009-2016.

Estimates of contributions of stock aggregates to the Southeast Alaska fisheries based on genetic analyses are only available postseason so it is unknown if the stock composition of catches in July changed between 2016 and 2017. **(5) However, genetic stock composition estimates are available in-season for the Northern British Columbia summer troll fishery and information gathered in 2016 and 2017 suggests very large differences in these years** (Table 1). Postseason results from the Southeast Alaska commercial troll fishery catches in July 2016 mirror those seen in the Northern British Columbia summer troll fishery in 2016. These comparisons suggest that the stock composition in northern PST fisheries has changed markedly since 2016, particularly so for the Interior Columbia stock aggregate, which is half that seen in 2016, for the Oregon Coast stock aggregate that is again about half that of 2016, and for the South Thompson stock aggregate, a run component in the Fraser River, for which the proportion has doubled since 2016.

**Table 1.-** Comparison of genetic stock composition results for the Southeast Alaska and Northern British Columbia commercial troll fisheries in early July.

Stock Aggregate	SEAK Troll	NBC Troll	
	2016	2016	2017
Interior Columbia	45%	37%	15%
South Thompson	13%	19%	40%
Oregon Coast	18%	24%	13%
Washington Coast	6%	6%	7%
WCVI	4%	1%	3%

In the Southeast Alaska sport fishery from 2009 to 2016, as was the case in the commercial troll fishery, the Interior Columbia stock aggregate was a major contributor. Combined with two other stock aggregates (i.e., WCVI and Washington Coast), these stocks comprised most of the sport harvest during the early July to early September timeframe.

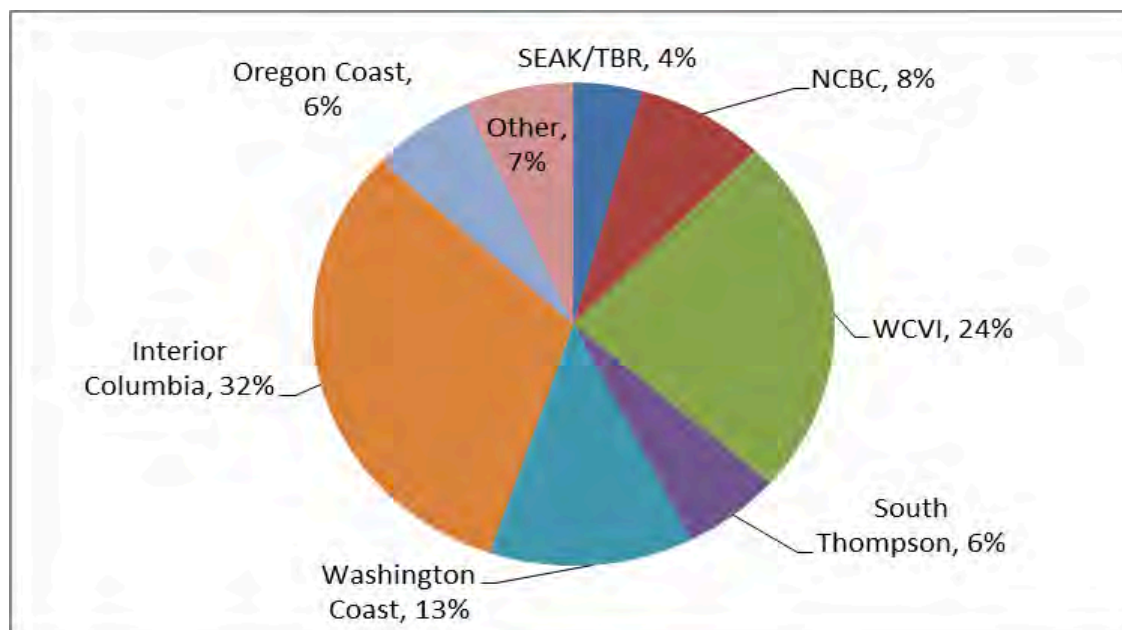


Figure 2.- Average stock composition in the Southeast Alaska sport fishery operating from early July through early September along the outer coast (Outside Area), 2009-2016.

Many of the stocks that contribute to the harvest in Southeast Alaska during August and September are fall-run stocks. As a result, at this time in 2017, it is too soon to fully evaluate the status of these stocks. In October stock status information for fall-run stocks will be available. Genetic-based stock composition information will be available for both the Southeast Alaska commercial troll and sport fisheries later this year.

## Outlook for Southeast Alaska Chinook Salmon Stocks in 2018

For Southeast Alaska Chinook salmon, preliminary escapement information gathered in 2017 suggests the 2013 brood year is a failure in the Taku and Stikine rivers. Information from the other 9 indicator stocks is still being compiled, but at this time very few 4 year old (2013 brood year) Chinook salmon have been observed in any of the indicator stocks. A similar failure was seen in 2016 for the 2012 age class among most of the Southeast indicator stocks which prompted serious concerns for runs in 2017. By mid-September a more complete understanding on the outlook for 2018 will be available but at this time available information suggests the 2018 Chinook salmon runs in at least the Taku and Stikine rivers will be worse than those in 2017.

## NOAA juvenile surveys

NOAA conducts annual trawl surveys off the coasts of Southeast Alaska, Washington and Oregon. Although the objectives of these surveys are not focused on Chinook salmon, all fish





species caught are identified and enumerated. Only a single juvenile Chinook was caught during the NOAA GOA survey off in Sitka in 2017; a typical low year would result in a catch of about 60 juvenile Chinook while a typical high year would be over 200. NOAA juvenile surveys off the coast of Washington and Oregon resulted in the lowest catches of juvenile Chinook since these surveys began. The warm water observed during 2016 oceanic surveys off of Southeast Alaska is still present, but is at a deeper depth in the water column.

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**Comment Topic # 3** – Delay the opening of the summer troll fishery from July 1 to July 8. Weigh impacts on ADF&G ability to develop in-season verification of pre-season abundance estimate.

**Regulatory authority of the Board of Fisheries:**

Chilkat River Action Plan (pg. 21). Option B, 2. Troll Fisheries:

- Summer Troll: delay the first retention period for king salmon during the general summer troll fishery by a week to target 70% of the remaining troll king salmon annual allocation, minus the number of treaty king salmon harvested in winter and spring troll, on July 8.

**Comment:**

Dear Board of Fisheries members

I am concerned that this action should not be taken without inquiring how it would affect the ADF&G ability to use the in-season CPUE data from the July 1 fishery as a way to verify the pre-season estimate of SEAK coast wide Chinook abundance. Once the fishery start date is changed you may be comparing apples to oranges. Currently the Pacific Salmon Technical Committee uses a mathematical model to generate the preseason Abundance Index.

However, the model has been unreliable and inaccurate due to the poor quality of data supplied by some CA, WA, OR and Tribal fishery managers. On October 6, 2016 the ADF&G supplied information to the Alaska Congressional Delegation listing the State of Alaska's concerns with how poorly the Treaty was functioning. The Congressional Delegation transmitted those concerns to NOAA Administrator Kathryn Sullivan, and US Department of State Deputy Assistant Secretary of State the Hon. Dave Bolton on October 6, 2016.

Excerpt from pages 3 and 4 of the letter.

- (2) the State of Alaska's concerns regarding the practice of generating a pre-season estimate of Chinook abundance based on a model, which is used to set annual harvest limits. The model is used without any measures of uncertainty, recognition of observational data, nor any attempt at reconciliation of observational data with assumed model-based input by the CTC, and Alaska's request to improve the process of setting harvest quotas by utilizing real-time, in-season abundance data from the Alaska fisheries to refine the pre-season abundance estimate; and

Could the Board of Fisheries please make inquiries about this before making a decision to delay the July 1 summer troll fishery start date? If the July fishery start date is changed the



State may lose a statistically significant data set that could potentially be used by the department as in-season verification of whether the preseason estimate is correct. Whether that preseason abundance estimate is developed from the model or from other data found valid by ADF&G.

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**Comment Topic # 4** – The cumulative affects of reducing troll Chinook effort in spring troll fisheries may generate a number (20,000 to 40,000 estimate) of Chinook available to be harvested in the summer troll fishery.

**Regulatory authority of the Board of Fisheries:**

5AAC. 29.060 Allocation of King Salmon in SE and Yakutat Areas.

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

- Chilkat and Unuk Rivers Action Plans

**Comment:**

Dear Members of the Board of Fisheries,

Allocation. If the troll fishery is restricted from the harvest of king salmon in the spring and winter in order to protect Alaska origin King salmon it will reduce the number of Chinook harvested in the Spring troll fishery. Is there a problem with transferring those fish into the summer season so that the overall allocation objectives set by the Board of Fisheries is met for the troll fishery?

At an October 12<sup>th</sup> meeting to explain management actions under consideration by the ADF&G, with trollers in Juneau, department personnel expressed concern that Alaska may come under some criticism at the Treaty if harvest impacts are shifted from winter and spring fisheries into the summer fishery. However, Canada has routinely shifted harvest times and areas for Chinook and maintains that the Treaty allows them the latitude to do so. Indeed a document by NOAA summarizing the understanding of the 2009 Treaty agreement also confirms this flexibility.

*“Chinook Salmon (Chapter 3): Because they pass through fisheries regulated by many jurisdictions in both Canada and the United States, Chinook salmon have been the focus of increasing concern and controversy in recent years. Although some Chinook populations are relatively healthy; others remain listed by the U.S. Federal Government under the Endangered Species Act (ESA). The new Chinook regime encompasses marine and certain freshwater fisheries in Alaska, Canada, Washington and Oregon. All Chinook fisheries will be managed based on abundance. Two types of fisheries have been designated:*

- (1) Those that will be managed based on the aggregate abundance of Chinook salmon present in the fishery, and*
- (2) Those that will be managed based on the status of individual stocks or stock groups in the fishery.*



*The 2008 agreement reduces the Chinook harvest in Alaska and off Canada's west coast of Vancouver Island by 15% and 30%, respectively, compared to the 1999 agreement that it replaced. The agreement provides a degree of flexibility to allow management agencies to decide how best to distribute the harvest impacts across their various fisheries to reflect domestic fishery priorities, provided the overall reductions are achieved. For some Chinook stocks, the total reductions will have to be much greater than the general obligation, due to the need to provide extra protection for certain very depressed stocks. The general obligation will not apply to hatchery stocks or healthy natural stocks that are achieving escapement objectives and can support harvest. In addition to predetermined harvest schedules, the agreement contains provisions that specify conditions under which even greater harvest reductions will apply. These so-called "weak stock" provisions serve as a safety valve to afford additional protection to stocks that may fail to respond to the recovery programs.*

[http://www.nmfs.noaa.gov/ia/agreements/regional\\_agreements/pacific/psc.pdf](http://www.nmfs.noaa.gov/ia/agreements/regional_agreements/pacific/psc.pdf)

A point to be considered; if Alaska reduces troll impacts on Alaskan origin King salmon systems, impacts are also reduced on the aggregate abundance of King salmon that are present in Southeast Alaska in the spring and winter at the same time. The Alaska Treaty obligation is to manage the achieve the all-gear Chinook quota which represents, in 2017, a 49% decrease in the harvest of Aggregate Abundance Treaty Chinook compared to the historical harvest share of Alaska during the base period. 1979-1982. Alaska will still meet its Treaty obligation if the total harvest of treaty Chinook meets the requirement of a 49% reduction from the base period.

If, for example 40,000 total fish from spring and winter were transferred to the summer fishery, what impact would that have on the aggregate abundance of coastwise Chinook moving through Southeast Alaska? Alaska origin SEAK/TBR stocks may compose 12% of the total Troll Chinook harvest, as given in the example Commissioner Swanton August 18<sup>th</sup> justification for the closure of the second Chinook retention period in August. But the 2016 estimate of total mortality for coast wide Chinook is 1.693 M Chinook. If one could add in the terminal run and escapement estimates of Chinook that move through the southeast Alaska fishery over the course of year, it could easily top 750,000 to 1 million Chinook. The affect of moving the harvest of 40,000 fish from winter and spring into summer would appear to be well below the level in which management of any fishery in WA or CA would change due to the redistribution of impacts.

\*\*\*\*\*



Submitted By  
Dennis thacker  
Submitted On  
12/28/2017 12:15:45 PM  
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Chairman

Alaska Board of Fish

Southeast and Yakutat Finfish

Jan. 15th, 2018

Ref. Proposal 159 Public Testimony

I oppose the banning of aircraft.

I have been involved in the herring/salmon fishery in SE since 1988. I have never seen a creek robbing such as this proposal indicates. My suspicion is that it is just the opposite. That planes help prevent creek robbing. A fisherman has no idea who flies by, whether they are even looking at what they are catching. In this day of social media, skippers who think a pilot flies over and radios his catch to other boats might want to check his crews Facebook page.

Airplanes have been part of the fishery since the early 30's. South East is so large and boats so spread out it would be much more difficult to manage the fishery without use of planes. Most processors use aircraft for placement of their fleets and tenders.

What this proposal boils down to is competition and money. Fishermen who don't use aircraft feel that the fishermen that do may have an advantage. Therefore the fishermen that don't use planes don't want to be forced into using one and having to pay. Their solution is to get a regulation that prevents anyone from using planes. Their mistake is just hiring a plane doesn't mean anything. They need a plane and a pilot that knows the area and can see the fish in the water. Otherwise they are just wasting their money. That is evident by the turnover in the pilots over the years and the complaints of pilots looking in nets, not finding fish on their own.

There are approx. 10 to 15 planes involved in the salmon fishery in SE. About half are employed by processors and half by individual fishermen. There are probably 5 or 6 more private planes on contract to dept. for surveys. Maybe another 400 or so private/air taxi planes that can be flying on any given day. Maybe difficult to tell who is doing what.

Thank you for your time,

Dennis Thacker



Submitted By  
Dennis Thacker  
Submitted On  
11/27/2017 7:52:42 AM  
Affiliation  
pilot, PVOA, UFA

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Board of Fish,

Sitka Alaska 2018

Comment on proposal 159, use of aircraft

Dear Board Members,

I am opposed to proposal 159. I have made my living flying for a group of commercial seiners in SE Alaska since 1992. I take offense of being accused of aiding the fishermen in taking fish illegally. I have never been involved in illegal fishing nor do I know any pilots who have. In my experience pilots help stop illegal activities. During daylight if a fisherman is inclined to bend the rules, they don't know when a plane flying over is enforcement, spotter, air taxi, private plane or other. Therefore I seldom observe illegal fishing.

There are additional benefits that the pilots perform, such as spreading the fleet out, providing update information to biologists and hatchery managers as to run strength and location. Pilots also provide fleet information to several of our main canneries, as well as crew and parts movement.

Since this proposal references robbing creeks as a justification, I believe that is already illegal, so it doesn't seem we can make it more illegal by adding a new rule.

The goal of the spotter is to find areas away from the main body of the fleet so their boats can fish with a minimum of congestion and wait times. Sometimes that is difficult because of limited area opening due to our poor returns of recent years. Most fishermen do not want to pay a pilot to get in a line-up.

Thank you

Dennis Thacker



Submitted By  
Derek Thynes  
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12/28/2017 2:17:37 PM  
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proposal 54 I oppose

drop in pot numbers will encourage more frequent pot hauling increasing excessive handling of crab

proposal 55 I support

this type of gear reduction has worked well in Bristol bay and SE herring gillnet

proposal 56 I oppose

reduction in commercial area is always bad economics in this case unneeded with Hollis bay being closed to commercial catch and no summer season in district 1 and 2. I used to crab in hollis bay before the closer and know it to be one of the most productive areas in district 2 catching at least 2000 crab a year out of Hollis bay i had about 1/4 of the gear in there.

proposal 235 I support

this method has been proven to work here and on the westcoast for decades

proposal 64 support

we are losing crab to old age in between fisheries might as well catch them

proposal 73 support

this would add value ,increase safety and minimize handling of nonlegal crab



Submitted By  
Donald Klepser  
Submitted On  
12/15/2017 10:07:30 AM  
Affiliation

PROPOSAL 146      5 AAC 33.364

i support this, this is one of the reasons that the seine fleet is under their allocation %.  
and it disprortionally puts the gillnet fleet above its level

Submitted By  
Donald klepser  
Submitted On  
12/15/2017 10:25:32 AM  
Affiliation

PROPOSAL 153      5 AAC 33.360

Take no action. In reality during the pink management plan for district 1 seine, the gillnet fleet is tied to the seine fleet not the other way around as stated. If there is low abundance and management reduces the days seiners are allowed to fish there is a corosponding reduction in gillnet days. so once again its the gillnet fleet tied to the seine fleet. let fish and game manage the fishery for future returns. I dont see what this acomplishes that isn't already in effect now

Submitted By  
Donald klepser  
Submitted On  
12/15/2017 10:40:41 AM  
Affiliation

PROPOSAL 140      5 AAC 33.383

do not approve this. Anita bay is one of the best examples where a THA is operating as designed.

Both seine and gillnet gear groups catch the fish in common property fisheries on the way to the THA and both equally harvesting in the THA.

This continued allocation discrepency wont be fixed by this. Pink prices are high, For profit private hatcheries fish are counted though neither gear pays into them yet the bulk is caught by gillnetters so there percentage is artificially inflated by this.

Submitted By  
Donald klepser  
Submitted On  
12/15/2017 10:02:55 AM  
Affiliation

PROPOSAL 145      5 AAC 33.372

i request that this proposal NOT be approved. There is no language in the proposal that once the seiners are in their range that this will return to the previous management plan.

When Nakat was a rotational fishery with the seiners it was of little benefit to the gillnet fleet. The harvest capabilities of the seine fleet can clean the bay out in 12 hours. This was experianced in the past. Allowing them three openings in july would essentially give them the whole harvest. SRAA doubled the production at Kendrick bay to allow them to have essentially all of the Nakat harvest with out sharing with the gillnet fleet.

The northern areas are now coming online with production geared towards the seine fleet. Why does it always have to be SRAA that takes the burden of meeting the out dated allocation tables.



Submitted By  
Doug Rlemer  
Submitted On  
12/26/2017 2:40:08 PM  
Affiliation  
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Dear Board Members,

I would like to address my oposition to Proposal 159.

I have been involved in fish spotting and commercial fisheries support since 1985, and can honestly say I have not seen or heard of a situation were aircraft have been used to evade law enforcement to aid in illage harvest of salmon in Southeast Alaska. This proposal should not be considered without clear, reliable data that proves the statement, "Currently aircraft are being used to evade law enforcement and spot fish in closed areas.... The vessels then 'herd' the fish to open areas..." Until there is proof that this is occuring, this proposal should not be considered. I believe aircraft used to spot or support the commercial salmon havest during open fishing periods have helped to detour illegal operations. When airplanes are flying around, people think twice before breaking the law.

Many proposals in regards to fish spotting in Southeast Alaska have come before previouese boards and have failed.

Thanks for your time,

Doug Riemer , N815V, Nordic Air

(907)-518-0244





Submitted By  
Ed Young  
Submitted On  
12/27/2017 10:29:31 AM  
Affiliation

For the first time I can ever remember there was no herring in Sitka Channel in 2017. I used to get a herring jigger at Thompson harbor and fill it in less than an hour. This year there was none...I only caught one herring last year.

At the turnaround (Halibut Point Road and Katlian Street) there used to be lots of crab grass and the herring were so thick that you could walk on eggs the spawning was so heavy. Also in front of McDonalds.

Last year, out in Crow Pass, we set in the spawn area and went back the next day and it was gone...Kassiani was the same way. In the past if we set 3 or branches in a couple days we would have all the eggs we need.

My brother and I were playing in the spawn and heard something hissing and looked down at a tide pool and it was full of herring, so we ran home and got a bucket.

The herring used to be huge around here back in the 60's and 70's before they started killing them in earnest. When we were kids we'd go to the Tackle Shop and buy twine and hooks and snag herring. We'd drop them off to elders and go get some more. At ANB float. There was always herring all through the channel. They have been gone since the early 70's.

They've killed off Kashakes Seymore canal, Tenakee. Even with just the bait herring. We were out in Tenakee at night and all the boats turned on their lights and the herring came bubbling up and the whole inlet was full of herring.

Auke Bay, Hobart Bay all used to have big herring runs. But they're gone due to over fishing...somebody's got to realize they're killing it all...not just the herring but the king salmon.

I keep hearing there are freezers full of herring roe because the Japanese don't even want it any more.... basically, killing it for no reason.... just for the dollar.

They don't care about the people who live here...they've been trying to get rid of us forever.

I hope people keep it up. Speaking Out.

Anywhere along Halibut Point Road and Sam Sing Cove and Alutkena, Deep Inlet, Sandy Cove, across from Camp Coogan.

Pick ne outside Pirates Cove and get ne. (Eggs on hair kelp)



Submitted By

Edith Williams

Submitted On

12/14/2017 11:05:45 PM

Affiliation

I can't be there, but I know I would tell about growing up in Millerville and every spring before the airport was built, the herring would plug the beach on the other side of the lagoon on the causeway to Alice Island and Charcoal Island. This was before environmental impact statement was law, otherwise the airport would not be where it is today.



Submitted By  
Elsa Sebastian  
Submitted On  
12/28/2017 10:00:33 PM  
Affiliation

I write my comments to encourage the BOF to give thought to the future of young fishermen and future generations when they consider the proposals that call for the conservation of herring. I have fished in Southeast Alaska for my entire life, and for the past 5 years have captained a troller. I am in favor of proposals 98, 99, 105 and 106. I will be brief in my comments on this issue, but when BOF considers proposals related to herring, I'd hope that they'd consider the following realities and what they mean for the future of small boat commercial fishermen, especially young fishermen who are investing in an uncertain future.

- **Southeast Alaska waters are less productive today due to declines in herring populations.** Please reference Tom Thornton's Herring Synthesis for testimonies from regional subsistence and commercial fishermen who offer their observations of sharp decreases in herring abundance across Southeast Alaska. I recognize the names of many commercial fishermen who I know and respect, including neighbors from my home community of Point Baker on the north end of Prince of Wales. They, along with many others, share their historical observations of thick herring spawn in areas that are now depleted or devoid of herring spawn. As a young fisherman, the loss of productivity of SE AK waters is troubling. Herring are a forage fish foundational to the marine food web, and critically important commercial species, including king salmon, rely on their abundance.
- **Increased pressure on forage fish by rebounding marine mammal species.** I am a board member of Alaska Whale Foundation, a research organization that studies humpbacks in Southeast Alaska. Although AWF didn't study the issue, we heard reports from colleagues of unusually high winter (2016-2017) populations of humpbacks in Southeast. According to observations, these whales were visibly unhealthy, and it was speculated that they didn't have the fat reserves necessary to travel to Hawaii to breed. We also heard reports of a record number of humpbacks in Hawaii dying from starvation (Hawaii is the breeding ground for SE Alaska humpbacks). Whales rely on many of the same forage fish, herring included, as our important commercial fish. Starving whales are a symptom of an unhealthy ecosystem. We also need to be aware of the impact of recovered marine mammal populations on forage fish, and manage the harvest of herring to accommodate this pressure.
- **The continued pressure on North Pacific forage fish from hatchery salmon.** According to the North Pacific Anadromous Fish Commission, hatchery release of salmon from the U.S., Japan, Russia and Canada was over 5 billion fish. The expansion of hatchery salmon programs, also points to a need to accommodate for increasing pressure on forage fish.
- **We are living an era of climate change and ocean acidification.** Warmer and more acidic waters will affect marine ecosystems in ways that we cannot anticipate. We do not know which species will decline, and which will flourish, but one of the most obvious ways to try to bulwark the resilience of the system is to be highly precautionary in our management of forage fish stocks.

For the past 6-years I have invested time and money into my commercial fishing business. I am worried about the resiliency of the marine systems that I have built this business on, and I am not the only one. In conversations with other young fishermen, the changing climate, and pressure on forage fish comes up over and over. There's little we can do to address the threat of changing ocean conditions, but the BOF does have to opportunity to try to manage forage fish for the resiliency of all of the species reliant on them. It's up to the BOF to consider the value of herring not just in the nets of the sac-roe fishermen, but in the ecosystem as a whole.

Please support one of the strong proposals for the conservation of herring, either proposal 98 or 99 would be a step towards managing herring in proportion to their role in the marine food web. I think proposals 105 and 106 would also be a benefit to herring conservation, and would directly address the valid concerns of the Sitka Tribe of Alaska.

BOF should manage herring stocks for what they are, a critically important forage fish. Herring were once abundant across Southeast Alaska, but now their future is likely dependent on the management decisions that are made in Sitka Sound. Thank you for taking the time to consider this important issue.



Submitted By  
Eric and Sarah Jordan  
Submitted On  
12/28/2017 6:22:36 PM  
Affiliation  
personal

ADF&G Boards Support,

P.O. Box 115526, Juneau, AK, 99811-5526 Dec. 28, 2017

Chairman John Jensen,

Alaska Board of Fisheries

Dear Chairman Jensen and Board members,

My name is Eric Jordan. I am a lifetime resident of SE Alaska and have lived in Wrangell, Ketchikan, Petersburg, and Sitka (41 years). I have been fishing since my parents took me fishing when I was 5 months old.

I have been involved in fisheries politics since the early 70's, speaking to the BOF for the first time in about 1973. I have been a member of the Sitka Fish & Game Advisory Committee almost continually since 1976. Among numerous fisheries boards, task forces, and conservation boards and employment I have served 8 years on the AP to the NPFMC, 7 months on the BOF, and 3 years on the SE RAC to the Federal Subsistence Board. Presently I am on the Sitka Fish & Game Advisory Committee and represent trollers on the NSRAA Board.

I troll salmon for a living on my 37' troller the "I Gotta".

My comments on many of the proposals and plans you will be considering in Sitka are reflected in the Sitka AC positions so I will limit my comments here to a concise comment on a few issues.

A. Problems the BOF must resolve.

1. The management of SE troll king salmon season in 2017 by a US Canada treaty Commissioner to initiate a mark select fishery and to eliminate a scheduled August troll opening "Alaska Salmon Hatchery and Enhancement Regulations (Title 5 of the Alaska Administrative Code) Chapter 40. Private Nonprofit Salmon Hatcheries 5 AAC 40.005. General. ***The harvest of salmon inhabiting the water of the state, regardless of whether the salmon are naturally or artificially propagated, may be conducted only pursuant to regulations adopted by the Board of Fisheries***". You will hear a lot about these unpopular decisions which cost Alaska millions of dollars and the department a lot of well earned support from trollers to save, according to the best information available to the public (CW) a couple of hundred SE wild king salmon.
2. Management direction for the Dept. to conserve SE wild king salmon while minimizing impacts to the troll fishery markets, processors, hatchery fisheries, fishermen, and crews. Historic BOF decisions, often after long battles, to dedicate 45,000 kings to the winter fishery, manage the hatchery troll fisheries to optimize troll harvest, and manage the summer season to distribute kings between July and August must be considered and not arbitrarily overturned by a Deputy treaty Commissioner. The Dept (outside of that problem) is doing the right thing by offering conservative management plans on the Unuk and Chilkat. But, the BOF must also take into account socio-economic factors like, for example, weighing the cost of saving not more than 10 Chilkat Chinook by delaying the troll season a week or two in July.
3. Efforts to fund a multi-million dollar mass marking and initiate mark select fisheries for the troll fishery outside of the BOF process by the US Canada treaty Coalition must be confronted. You have resolutions and letters from NSRAA, the Sitka AC, and Alaska trollers opposing this fishery. But it is symptomatic of a bigger problem with US Canada treaty operatives intruding into BOF and regional fishery manager realms with disastrous results both in terms of management and ruination of public processes.
4. Trollers remain well below their allocated share of SE Alaska enhanced salmon.



B. Recommendations for actions to resolve identified problems.

1. Direct the Dept. to bury the mark select king salmon fisheries for the troll fisheries. Confront intrusions by the treaty coalition and operatives into the BOF areas of jurisdiction.
2. Direct the Dept. to manage the troll fishery with surgical precision to conserve SE wild king salmon while maintaining as much as possible existing seasons, and internal and external allocations. Direct the Dept. to use a scalpel rather than a machete to craft opportunity while assuring wild king salmon escapements and rebuilding. Do work with the troll fleet, AC's, and communities instead of management by edict with minimal notice.
3. I, and a lot of other conservation minded trollers, believe, based on the best information available to us, that the action plans for the Unuk and Chilkat we have seen, and forthcoming plans for other SE wild king salmon management, can be improved by careful examination of the data and surgical timed area openings and closures. That plans to close the winter fishery throughout the region a month and a half early, and delay the summer salmon troll season a week or two is not warranted by data available to the public.
4. Opening the summer troll season on the long time traditional date of July 1 is important for a lot of reasons. Opening then to harvest other salmon when king salmon have not seen a lure for months is not something conservation minded trollers want. I recommend open July 1 for as short as two days to start the season and then go to non-retention until August when SE spawners are past the troll fishery, the remaining king salmon are usually larger and worth more.
5. You have several proposals to improve troll opportunity on hatchery produced chum salmon. 150,173,174, and 175 address that fishery. The data shows the chum troll fishery is highly effective at targeting hatchery chum with practically no by-catch. These enhanced chum salmon troll fisheries have become particularly important to trollers as king salmon retention areas and times are reduced. Please adopt these proposals.



Submitted By  
Franklin James, Srl  
Submitted On  
12/21/2017 1:19:28 PM  
Affiliation  
Subsistence user

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Herring fishers in Sitka:

Comments on how the sac roe fishery in Sitka, and how it has been handled, first I will comment on other areas first.

Chatthem Straits: There use to be so much herring in that area, the fish & game let all these sardine seiners wept and destroy that area, and that includes Warren Island and inside and out side of Pedro.

Ketchikin, Kah-Shakes area: again mismanagements by the fish & game, use to be big spawns in West Behm, Gravina, all the way to Naha, Mary Island, Kah-Shakes area, all are gone, can not even get anything thick enough to eat.

Craig, Klawock and McFarland Islands area: Spawns in these areas were do big, it made the Sitka area look like a small spawning area; winter bait fishery and pond fisheries are fast depleting those areas.

Seymour Cannal: that area will never recover.

Sitka: was also a big spawning area, now you will see lots of milk in the water; as we all know, the female come in first and then the male herring, they kill off all the female, and the male let there milk go, and there are no female herring to lay there eggs, the fish & game will kill that off next, like the rest of S.E. Alaska, for the almighty dollar.

Franklin H. James, Sr.

Love my herring eggs,

It is getting harder and harder to get.



Submitted By  
Fred Fayette  
Submitted On  
12/28/2017 8:31:57 PM  
Affiliation

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#### Board of Fish

I have been trolling in SE since 1972 and have seen many changes to the fishery. I have always been supportive of actions to protect our king salmon stocks. This past spring and summer there were three actions that seemed counter to protection.

1. Our spring hatchery fishery was severely curtailed. We fish inside waters near Sitka, where the stocks of concern are not a problem. Yet the charter fleet fishes every day, in areas that the stocks of concern pass through. It doesn't seem as though ADF&G cares enough to shut down everyone. Are they really worried about the fish ?
2. The Mark Select Fishery was imposed on the fleet without much thought about how it works in reality. There are not many fin clipped kings. They are worth a lot of money. Fishermen will bring a fish aboard to see if it's missing that adipose fin. The mortality rate will increase. This MSF was introduced against the wishes of the Alaska Trollers Assn and many, many fishermen. Why would we give up a chance to catch more kings ? Because we care about the long term effects of shaking so many non fin clipped fish.
3. It now appears that ADF&G knew that the stocks of concern had already passed the outside waters when they decided to not reopen our fishery in August. That decision cost our already depleted fleet more than \$3,000,000. There was no biological reason to implement this closure. That was a massive blow to the fleet.

Thanks for your consideration

Fred Fayette



Submitted By  
Gary Adkison  
Submitted On  
12/20/2017 2:45:24 PM  
Affiliation

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**TO: Board of fisheries concerning proposal 56 SE shellfish .**

**From: Gary Adkison**

**I AM OPPOSED TO PROPOSAL 56 .**

I am a full time resident of hollis the community that this proposal is supposed to help. First of all there is still more than enough shrimp and crab to support a subsistence "lifestyle". Just last week I pulled 2 Dungeness pots that had 20 nice hard crab way more than one family could possibly eat in a night . however no one in this community depends on it to "survive" it is a "LIFESTYLE" . There is already an area right near the community that is closed to commercial harvest . This area has a very good crab population. In my 28 yr here I have never seen a time you could not paddle out in a skiff with two pots and get enough crab for a family to eat there fill.

I have lived here since 1989 and grew up fishing these waters with my father. I started commercial Dungeness fishing here in 1998 In that time I have seen the crab catch fluctuate as you can plainly see by looking at historical catch records there is roughly a 10 and a 20 yr spike followed by a notably low catch rate. There are also fluctuations in market price and with these fluctuations comes an increase and decrease in effort. In 1998-2000 there was more boats fishing this area than there has been the last few years the only difference is that the people that wrote this proposal were not here to see it.

I do Understand That most of the people now living in this community have not been here long enough to see the ups and downs of these fisheries. And it could look as though over fishing was the culprit, having only 5-10 yrs to observe. But I truly believe that it is just a natural cycle. The only real threat to the Dungeness fishery is sea otter !!!!!!!

Thank You For taking the time to consider my thoughts on this Subject.

Gary Adkison





Submitted By  
Gary Adkison  
Submitted On  
12/20/2017 2:49:13 PM  
Affiliation

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Craig , Alaska 99921

**TO: Board of fisheries concerning proposal 84 SE shellfish .**

**From: Gary Adkison**

**I AM OPPOSED TO PROPOSAL 84.**

I am a full time resident of hollis the community that this proposal is supposed to help. First of all there is still more than enough shrimp and crab to support a subsistence "lifestyle". Just last week I pulled one single shrimp pot and got enough shrimp for a family dinner. I pulled 2 Dungeness pots that had 20 nice hard crab way more than one family could possibly eat in a night . however no one in this community depends on it to "survive" it is a "LIFESTYLE" .

I have lived here since 1989 and grew up fishing these waters with my father. In that time I have seen the shrimp population come and go. In the 90's there were times we could not catch a 5 gallon bucket of shrimp out of 100 pots and the cod fish were thick. Then for some reason we quit catching cod and starting in 2000 the shrimp fishery here exploded for the next 10 yrs. then we started to see an abundance of cod once again (large eye pollock and pacific cod) and we noticed large areas almost void of shrimp from one yr to the next. Not from over fishing because they were excellent grounds when the season closed and a significantly decreased biomass when the season reopened a yr later. I was concerned myself and cooperated fully with ADFG when they started doing their surveys and sampling I provided them with charts of all the known shrimp grounds . I do not disagree with adfg's decision to close the commercial harvest of shrimp temporarily in this area until it can rebound . I feel that the adfg biologists have the situation under control and when the biomass does rebound there is no reason there shouldn't be a commercial fishery once again .

I do Understand That most of the people now living in this community have not been here long enough to see the ups and downs of these fisheries. And it could look as though over fishing was the culprit, having only 5-10 yrs to observe. But I truly believe that it is just a natural cycle and an increase in cod predation.

Thank You For taking the time to consider my thoughts on this Subject.

Gary Adkison



Submitted By

Gerald Hope

Submitted On

12/18/2017 10:58:04 AM

Affiliation

This comment addresses the upcoming, 2018, Herring Fishery in and around the Sitka Sound Area. I am approaching my 64th birthday, was born and raised in Sitka, Alaska. I have, in my lifetime, witnessed a dramatic decline in the amount of herring in the Sitka Sound Area. In my childhood years, living in the Sitka Village on Katlian Street, it was common to see vast amounts of herring swim through the Sitka Channel, often being chased by sealion. The amount of herring in those days that I recall then, early 1960's, it was such an impressive sight that many in our Native community looked forward to. It was because we knew we could count on one of our traditional Native foods to be here, to access, to eat. Now, in these recent years it has become scary to see such a decline in both the amount of herring and the herring spawn. And, it has been a number of years now since being able to see herring even swim through the Sitka Channel, certainly not in anything close to resembling the mass that swam through in my childhood days. I strongly support the propositions submitted by the Sitka Tribe of Alaska.



Submitted By  
Greg Albrecht  
Submitted On  
12/15/2017 10:18:27 AM  
Affiliation  
none

Proposal 63: SEAK Red King Crab

I oppose this proposal, specifically because it allows harvest when king crab biomass does not meet the current minimum biomass threshold. Though I recognize the harvest would be minimal, populations in unsurveyed areas can be genetically connected to the broader population. Perhaps the test fishery could be executed in years of abundance.

Proposal 64: SEAK Red King Crab

I oppose this proposal for the following reasons: The 200,000 lb minimum threshold (formerly 300,000 lb) has resulted in a cycle of harvest followed by fishery closure and subsequently, does not meet the requirement of Article 8, section 4 of the Alaska Constitution, maximum sustainable yield. Fishing should only be considered when harvestable crab biomass in a given area is above a threshold established by biological data, not economics.

Proposals 132, 133, 134: Spring salmon troll fishery management

I support these proposals which use a combination of existing data and closures to more precisely manage these fisheries for sustainability and use by all groups.

Proposals 137, 185, 188, 190, 191, 192, 194: Personal use

I support these proposals which are steps towards restoring southeast residents a "fair and reasonable" opportunity to fulfill their personal use needs as required by AS 05.16.251(d). The board has enacted a regulation (5AAC 77.682(c)) that diminished this right afforded in statute. ADF&G provides very few opportunities for Juneau residents to efficiently gather salmon for a sustainable and healthy food source that is at the core of what it means to many to be Alaskan. Meanwhile, non-residents may take fish caught with efficient gear types for their home-pack (5AAC 39.010(a)), much of which goes unreported.

Though current regulation (5AAC 77.682 (n)) allows for 150 pink and 50 chum salmon to be harvested from waters open to personal use fishing, only fresh waters are opened where fish quality for these species is low. Allowing the use of efficient gear types for personal use in salt water, in this case, could provide high quality fish for a person looking to can, smoke, or freeze a large number of pink or chum salmon for their family that would be "reasonable" and most likely, have little effect on the actual number of fish harvested. The benefit being the reduced expenditure of time and money by the fisher.

Allowing similar means for the taking of coho and king salmon in saltwater could arguably result in more harvest by non-commercial fishermen; however, this is their right. Since restoring the ability of Southeast residents to efficiently gather salmon is "in the broad public interest", which can take priority over "an existing resource use" as stated in 5AAC 77.001, reallocation of the resource among user groups must be undertaken. It is the law.

Thank you for your time, consideration, and service to the Board.



Submitted By  
greg dierick  
Submitted On  
12/27/2017 2:47:34 PM  
Affiliation  
commercial fisherman and lodge owner

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This is in opposition to proposal 165 on markers being moved on the Tsiu river, being a commercial fisherman and lodge owner on this river for over 40 years, i feel the commercial regulatory markers should be kept as is (1/2 mile from any part of the the lake the water flows out) as there is already a huge conflict between commercial and sport fishermen, i have other ideas to deal with this problem such as giving commercial fisherman more fishing time on the river or moving the markers up from the half mile to a 1/4 mile from 10pm to 4am on commercial fishing days, this gives the commercial fisherman plenty of time to clean out the few holes of fish in this area without conflict to the sportfishery,(since the sportfishermen usually show up around 5 am and leave the river at night around 9pm) trying to get everyone on the the river to get along has been a challenge on this river , i hope you give some of my recommendations some consideration as both groups want to work togeather but the river is so short now and just moving the markers up will do nothing but create more conflict. thank you



Submitted By  
Heather Sanborne  
Submitted On  
12/28/2017 2:48:34 PM  
Affiliation  
fishing charter company owner

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Skagway, Alaska 99840

To whom it may concern,

December 28, 2017

**Re: Regulations Pertaining to King Salmon in District 15**

My husband and I own Mozeon Alaska Charters and have been running scenic fishing charters in Skagway (Skagway Salmon Fishing) and Haines (Haines Family Fishing Charters) since 2014. The purpose of the following letter is to briefly describe the current charter operations in Upper Lynn Canal and explain the minimal impact these operations have on the King Salmon fishery.

It is understood that Fish and Game is concerned with King salmon numbers and is investigating various strategies to help future populations. We want to stress the VERY minimal impact that the operators in Upper Lynn have on King Salmon.

- There are only 4 operators in Skagway, 3 in Haines: Of these 7 boats only 5 fish primarily for salmon. Contrast this to dozens and dozens of operators in Juneau, Ketchikan and Sitka. Minimal operators means less pole hours and less stress on the fish
- We have all adopted safe fish handling practices including barbless hooks, releasing in the water and use of rubber nets for any fish brought on board etc. This all increased our rate of successful release without harm to the fish.
- We see less fish between all 7 companies over the course of the entire season in District 15 than a commercial gillnetter sees in a typical 2 day opener.
- We have shifted the focus of the trips from catching fish to wildlife and scenery. We market to families and small private groups who want an overall incredible experience rather than meatheads that want to fill their freezers at home with fish. The more avid fisherman is attracted to the bigger fishing ports of Juneau and Ketchikan.
- After the change in regulations in 2017 to no king salmon retention we started rigging for pink salmon and other species on our trips instead of kings. It was a great success. The guests we have on board are happy with action on the line whether it's a king a pink or a dolly. This decreased the pressure on the king salmon and greatly reduced the amount of juvenile kings on the line while taking advantage of the seemingly endless supply of pink salmon.
- The no retention regulations in 2017 caused a huge decrease in the number of locals and Canadians trolling for salmon in Upper Lynn Canal which relieved most of the normal pressure on the kings in our area.

Closing charter fishing down in district 15 would be completely detrimental to the livelihood of the operators there. Please consider keeping the regulations in 2018 the same as 2017 and looking at the other options to increase king salmon numbers. Again, closing fishing down completely in District 15 would have minimal (if any) positive impact on king salmon numbers.

Thank you very much for your time and attention to this very important matter.

All the best,

Heather Sanborne

907-612-0476



Submitted By  
Hope Merritt  
Submitted On  
12/17/2017 10:22:51 PM  
Affiliation

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To whom it may concern,

I am writing to those that will be making decisions on the Sitka Sac Roe Herring fishery. I am very concerned about the health of the herring in Sitka Sound. I have been harvesting subsistence roe on kelp and branches for over 12 years now and every year I go out there are less and less fish and less and less eggs or deposition. This year when we went out to set branches we set in a good spot with lots of milt in the water. The branches were barely covered in eggs when we pulled them. When we check where ADF&G reports spawn, sure there is milt there, looks good from the air maybe but when you look at the shore there are only a sprinkling of eggs and no birds. In the past you would see thick spawn maybe an inch or more of eggs stuck to the rocks and birds everywhere feasting. I have skiffed all around Sitka sound looking for good kelp with spawn. I have not been able to harvest roe on kelp with any more than a sprinkle of eggs as well, it's not worth it. I want you to know because you may not be here in Sitka to see what is happening. The herring just are not here like they used to be. Even if you believe the sac roe fishery has nothing to do with the numbers declining, wouldn't it be prudent to start being very conservative when it comes to fishing them? As a harvester I even question the morality of harvesting subsistence eggs at this point, that's how bad it is. It's hard to live here and not notice the decrease in wild life coming to our shores every spring. If ADF&G believes the Sitka Sound Herring stocks are doing just fine then perhaps they are paying too much attention to flawed science and not to nature's obvious clues. Please show respect to future generations of humans and herring when you make decisions on herring in 2018.



Submitted By  
Jackie Timothy  
Submitted On  
12/18/2017 8:48:00 PM  
Affiliation  
Personal use and sport fisher

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Proposal 54. **Support.** Less pots, less ghost pot fishing potential.

Proposal 55. **Oppose.** Commercial fisher pressure, sea otter predation, and area closures stress Dungeness crab populations. More pots, more ghost pot fishing potential, and more unnecessary stress on the population.

Proposal 63. **Oppose.** In accordance with the precautionary principle, assume when king crab biomass in areas considered for commercial harvest does not meet the minimum threshold, king crab from unexplored areas contribute to population recovery. Require commercial fishers interested in exploring new areas to fully fund the research necessary to determine the contributions of unexplored populations to populations in threshold determination areas and also fully fund the surveys and analysis necessary to determine harvestable biomass above that level in unexplored areas.

Proposal 64. **Oppose.** Commercial fishers pressure fishery managers into opening the red king crab fishery in 11A when abundance is low resulting in a cycle of harvest followed by multiyear closures. 11A provides an extraordinary and unusual Alaskan opportunity for urban red king crab personal use fishers that should no longer be decimated by greed influenced mismanagement.

Proposal 75. **Support.** Limit number of pots and pounds by permit.

Proposals 82 and 83. **Support.** Unique urban shellfish fisheries opportunities must not continue to be diminished unsustainably by commercial users able to access areas not accessible by smaller vessels.

Proposals 132, 133, 134. **Support.** Manage fisheries on data and closures for sustainability and equity among user groups.

Proposals 137, 185, 190, 191, 192, 194. **Support.** Restore a "fair and reasonable" opportunity to southeast personal use fishers as required in AS 16.05.251(d).



Submitted By  
James Carter Hughes  
Submitted On  
12/20/2017 3:56:36 PM  
Affiliation  
self

Dec 20, 2017

Chairman Jensen and members of the Alaska State Board of Fisheries (BOF):

My name is Carter Hughes and I am a Sitka based troller. I also participate in the halibut and sablefish longline fisheries. I have worked in the Alaska commercial fisheries since 1984 and have owned my own fishing vessel since 1993. This is the first of two written comment (WC) letters I am sending the BOF. This WC focuses on the proposals that are in the book that was released earlier this year. The next WC will focus on the Alaska Department of Fish and Game's (ADFG) soon to be released plans for rebuilding chinook stocks in the Southeast Alaska (SE AK) region. In order to keep this WC document as short as possible I will minimize my comments if I think the Proposal author(s) has explained their case sufficiently.

Groundfish Proposals:  
Prop 113 Support

Prop 115 I support the concept of this fishery but I think it needs to be initiated as a test fishery first. Perhaps the authors or others interested in participating in a dogfish pot fishery could work to establish a test fishery utilizing a Commissioner's special permit.

Prop 116 Support

Prop 121 Oppose I don't fish sablefish in inside waters but the precedent the proposal sets is bad. It looks like a reallocation request dressed up in conservation rhetoric that favors larger vessels. The conservation claims are not substantiated with evidence (the numbers are inflated) and conflict with my personal experience. I do support the idea of free choice between pots and longline gear but the two types of gear can conflict and only larger vessels can operate pot gear efficiently. Pot gear can get lost and cause problems just as easily as longline gear. Pots tend to catch smaller fish which means more fish die to make the same poundage. Pots do tend to have lower bycatch and probably eliminate marine mammal depredation. However, there are ways to reduce marine mammal depredation with longline gear that the proposal author ignores. There are also ways to reduce excessive bycatch with longline gear. Alaska Longline Fishermen's Association (ALFA) has networks and data collecting programs that provide information to fishermen on hotspots for rockfish bycatch and marine mammal depredation to help fishermen avoid the situations the author of this proposal mentions.

Prop 124 Support

Prop 127 Support

Prop 133 and Prop 134 Oppose ADFG is currently developing a plan to address the low chinook returns in the SE AK systems. This will likely include closures the last 6 weeks of the winter troll fishery and closures to many spring troll (hatchery access) options for the troll fleet. Proposals 133 and 134 will close troll opportunity on non Chinook salmon fisheries. None of the other fisheries, sport or gillnet, is being restricted for non Chinook harvest and there should be no non Chinook restriction on the troll fleet either. Some of the district areas that are discussed in these proposals include troll chum fisheries, which do not target king salmon. If the authors of these proposals want to be consistent with their alleged conservation concerns then they would shut down all fishing activity, sport and gillnet non chinook fishing as well. I would not support that concept either as I see no reason to close non chinook fisheries of any type in this situation. Again, ADFG has a yet to release its plan to address these issues. The BOF will be in possession of the ADFG plan by the time of the January meeting.

Prop 139 Oppose As I understand the current rotation scenario, it allows for troll and seine rotations in the Southeast Cove Terminal Harvest Area (THA) to target chum salmon. The troll fishery has been chronically under its enhanced fish allocation for years. The seine fleet is at or just under their allocation as well. This proposal would potentially allow for a gillnet rotation in SE Cove. The gillnet fleet has been ahead on their enhanced salmon allocation for years. NSRAA has historically demonstrated an indifference to the troll enhanced salmon allocation underage. Just one year ago, NSRAA cut production of Hidden Falls king salmon and Mist Cove coho to fund chum production. Both the cuts effected troll focused programs to increase funding for and production of chum salmon, which some claim is a net fish salmon species. There has been some progress made recently at NSRAA in allowing trollers access to new and future chum salmon production and the troll rotation in SE Cove is an example. If this proposal passes then all it would take is a vote of the NSRAA board (trollers are outnumbered on the NSRAA board) to allow for a gillnet rotation, which would require that trollers have less time in the SE Cove THA. It will be important for the troll fleet to expand opportunities to harvest non chinook salmon species in the future as the opportunities to harvest chinook is likely to be limited for the next few years.

Prop 144 Support This proposal has been modified to allow for troll access to the Deep Inlet THA during cost recovery and not during net rotations. Thus it in no way displaces seiners or gillnetters from their current access. As mentioned before the troll fleet is running very far behind in their allocation to enhanced salmon. The revised version of this proposal, that does not allow for troll access during net rotations is a fair way to provide some miniscule increment of increase to enhanced salmon production for the troll fleet.





Prop 146 Oppose The Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (SAESAMP) was implemented in January 1994 by the BOF after the Southeast Alaska Allocation Task Force (SATF), formed by the BOF in 1991, submitted a consensus paper describing the current sharing arrangement. All three gear groups had 2 voting members and the private non profit (PNP) hatcheries were represented by a non voting seat that was held by Douglas Island Pink and Chum (DIPAC). Proposal 146 is designed to solve the current enhanced salmon allocation inequity issues by removing a key component (the PNPs) from the equation. The SEASAMP agreement included the PNPs and was a consensus, ie all voting members of the SATF came to a common point of view, when it was worked out in the early 1990s.

There is another way to solve the problem using the existing management plan, and that is stated in Guiding Principal 13 (GP 13) of document 94-148-FB, Findings of the Board of Fish, The Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364). GP 13 offers 3 options for the regional hatcheries to address enduring allocation issues with respect to enhanced salmon.

1. Special Harvest Area (SHA) management adjustments (example: rotation modifications in a THA or SHA.) This is a short term option that is intended to help achieve the allocation goals until the long term adjustments of 2 and 3 can take effect.
2. New enhanced salmon production.
3. Modification of enhancement projects production, including remote releases.

The three options listed above have not been exhausted. Option 1 has been ignored except with Neets Bay, a SSRAA facility. Options 2 and 3 are being implemented by both NSRAA and SSRAA. The NSRAA projects at SE Cove and Crawfish Inlet are examples of longterm attempts to increase troll access to enhanced salmon. Time will tell how effective these projects are. That said it is not appropriate to change the current formula of allocating enhanced salmon among the SE AK commercial salmon fleets by removing the PNPs from the count.

Prop 148 Oppose This proposal must have been written before the current crisis with the SE AK king salmon stocks was well known to many folks. As I have said, ADFG will be releasing a management plan for all harvesters of SE AK river chinook . There are definitely Unuk river intercept issues in the area that this proposal addresses. Most of the spring troll areas in the southern districts are likely to be closed or extremely limited. I can't see expanding bag limits for the sport and charter fleets in this area as prudent at this time and I doubt ADFG will either.

Prop 149 Support

Prop 150 Support

Prop 151 Support

Prop 172 Support I strongly support the concept of this proposal. However, this area may be under serious restrictions by ADFG until the Unuk River stocks are rebuilt. It may be that this proposal should be passed under the caveat that it not be implemented until ADFG feels its safe to fish in that area during the time discussed in the proposal.

Prop 173 Support

Prop 174 Support

Prop 175 Support

Prop 176 Support

Prop 177 Support

Props 178, 179 Oppose I am sympathetic to the concerns of the authors of these proposals when it comes to the economic impact on non Sitka communities when pre April closures of the winter king salmon fishery occur. The quality of product and market glut issues is weak however. The primary problem with these proposals is that the concern of pre April closurei caused by high harvest rates is an anomaly. The only 2 years where pre April closures, due to high harvest rates in the Sitka area, occurred were 2015 and 2016. This never occurred at any other time in the history of the winter fishery since the 45,000 king cap was implemented in 1994. 2015 and 2016 were anomalies. I started winter king trolling in 1994 and never saw any years like 2015 and 2016. Further, ADFG is likely to be closing the winter troll king fishery in mid March this year to protect SE AK king stocks of concern. If this proposal were to become regulation, it would most likely occupy space in the regulations and never be utilized.

Prop 180 Support

Prop 181 Support I strongly support the concept of this proposal and the author's reasoning is quite sound. I would be happy to support a scenario with two openers that is split 50% / 50% . It would add value to the troll fishery. It would reduce adding to market gluts in early July, the most glutted time of the year for salmon markets. That said, until ADFG releases their management plan for the SE AK king stocks of concern, this proposal will most likely not be able to be implemented. When management of the troll fishery returns to normal, I would very much like to see the king salmon openers in the summer season managed under this scenario.

Prop 182 I support the planning and scheduling intent that the author mentions. This is especially true for the processing sector, they would have to know what ADFG thought of this before supporting it.



Prop 183 Support

Prop 184 Support

Prop 185 Oppose This looks like an enforcement nightmare. If this is implemented than it needs a rigorous accounting system, complete with fish tickets and inspected landing requirements so that the very large increase in harvest is understood immediately. As far as chinook is concerned, the proposal would create more accounting and management problems for ADFG in rebuilding the SE AK chinook stocks of concern.

Prop 186 Support

This concludes my recommendations on proposals in the 2017/2018 Alaska Board of Fisheries Proposal Book. I am not sure if ADFG will have their 2018 chinook management plans released in time to submit written comments. I will comment on that, if possible, after it is released.

I have a couple of comments I am going to add to this testimony in regards to rebuilding plans for chinook in SE AK. Last year, only the trollers had a cut in harvest. The sport sector had some serious restrictions, but they still harvested beyond their section of the quota by 40%. If the stocks of concern are to be rebuilt, then there needs to be better accounting in the sport sector. It has to be more than voluntary. Remote lodges need to be treated similar to processors. They need to accurately report their catch weekly. Lodges need to provide for inspection at their docks and processing facilities by ADFG data collectors and enforcement. This can't be voluntary. This is a black hole of information that is needed by ADFG to rebuild stocks.

The longer that the rebuilding process takes, the more likely the hatcheries will be to scale back and eliminate hatchery king programs. These are primarily funded by the commercial fishing sector. It will be hard to argue for continued production of king salmon at hatchery facilities if those paying for them can't harvest them. I hope that the hatchery king programs can be maintained during the rebuilding process. This can only be done if opportunity to harvest AK hatchery kings that is low impact on the stocks of concern can be allowed. This is particularly true for trollers. The sport interests that want to maintain access to hatchery produced kings will have to understand that the hatchery king programs are not likely to be maintained for them alone. Sport accounting has to be improved so that cuts to the troll king fishery are not just reallocations to the sport sector. If sloppy sport accounting continues the likelihood of eliminating the hatchery king programs will increase.

I have another note on the hatchery production of salmon. Trollers are going to need increased access to non chinook enhanced salmon. This means more meaningful access to THAs (not 1 day a week like Deep Inlet). It also means maintaining coho programs and not cutting them to reallocate the funds to something else. My last statement is providing background information. I realize the BOF does not decide what salmon programs a hatchery funds.

Finally, restricting trolling opportunities to harvest non chinook salmon, such as chum and coho, should be avoided. The summer troll season should open for cohos on or before July 1. Troll chum and pink salmon fisheries should be left intact. If non chinook troll fisheries are restricted for the purpose of rebuilding the SE AK stocks of concern, than so should the same non chinook opportunities for all other salmon fisheries in the same area. If that is not done, then the conservation issue is not addressed; there is merely a reallocation of resource and area.

This concludes my comments. Thank you all for your commitment to Alaska's fisheries and all the folks that depend on them.

James Carter Hughes  
FV Astrolabe  
Sitka, AK



Submitted By  
James Carter Hughes  
Submitted On  
12/27/2017 1:32:10 PM  
Affiliation

Dec 27, 2017

Chairman Jensen and members of the Alaska State Board of Fisheries (BOF):

My name is Carter Hughes and I am a Sitka based troller. I also participate in the halibut and sablefish longline fisheries. I have worked in the Alaska commercial fisheries since 1984 and have owned my own fishing vessel since 1993. This is the second of two written comment (WC) letters I am sending the BOF. This WC focuses on the two draft papers released by the Alaska Department of Fish and Game (ADFG) that discuss the management options for the Chilkat and King Salmon Rivers and the Unuk River: **Draft: Chilkat River and King Salmon River King Salmon Stock Status and Action Plan, 2018. (CKS AP) DRAFT: Unuk River King Salmon Stock Status and Action Plan, 2018. (U AP)**. My comments will be fairly general as I think the specific actions required will be determined by the response and recovery of the stocks after initial actions are implemented.

First of all, it is apparent that there are real conservation concerns with these three river systems and I understand and support the fact that restrictions on fishing activity will be required to rebuild these stocks. I am a troller and the troll fleet has born the brunt of the restrictions.

The troll sector is the only group that did not get to harvest its section of the SE AK king salmon harvest last year. The sport sector was very tightly restricted in some areas, especially around Juneau. However, the sport fishery was never entirely closed to chinook retention until mid August when the troll fishery was denied its second opener on short notice. Further the sport fishery was allowed to exceed their section of the SE AK quota by approximately 40%. The economic impact on the troll fleet last year was severe and greater than the other groups. Trollers harvest the largest amount of the king salmon caught in SE AK, thus I can understand that trollers shoulder the largest component of the conservation burden. The two papers both dismissed or downplayed the economic impacts on the troll fleet. This bias is clearly present in the Benefit and Detriment statements that follow the management options. For all the Detriment statements that pertain to the sport group, mention of adverse economic impact to the charter fleet is explicitly mentioned. In the case of the troll and net fish groups, all that is occasionally mentioned is the potential lack of opportunity to harvest non chinook species of salmon. In some cases the economic impact is outright dismissed. On page 14 of the U AP, the Benefit statement for the troll Option 1 states: "**Benefits:** These management actions can be accomplished through EO authority and the user groups are accustomed to the actions. The restrictions are directly related to historical coded-wire tag data. The fisheries impacted by these restrictions experience minimal disruption." ☐ This statement is false. One year of implementation does not make the fleet accustomed to the action. Further, the disruption is severe, not minimal. I am rather surprised to see this statement in the document and it reflects a lack of understanding at ADFG of the troll fleet and how it is impacted by last minute notifications and massive area closures. The closure in May and June last year was region wide. It is quite possible that extremely disruptive actions were required and will be required to rebuild these stocks. I am not arguing that point. However, dismissing the impact as "minimal" is grossly negligent in describing the situation. If the charter fisheries warrant noting an adverse economic impact, so does the commercial sector, especially the troll fleet, which will be taking the biggest economic hit of all the various user groups.

One of the sources of bias is in the less stringent data collection methods that is applied to the sport sector verses the commercial sector. It leads me to believe that there is great uncertainty in the impact of the sport, especially charter sector. I mentioned in my previous WC document, that I submitted a week ago on the Proposals, that lodges need to be monitored more closely and their should be mandatory weekly catch reporting. Data collectors need to be able to sample fish for tag and genetic information. This data collection should be mandatory, not voluntary. There is nothing in the documents to address this. In Table 1, page 19 of the U AP, the data indicates a very low sport impact on Unuk chinook in the early section of part of the season, while displaying a much larger impact by the troll fleet. The sampling of the troll fleet is much more rigorous. I'm sure some uncertainty was used in accounting for the different sampling methods, but I still think the comparison is weak. The obvious lack of bias awareness is the worst thing about these papers. The actual suggestions for management actions are well developed and I am fully behind ADFGs work to rebuild these chinook stocks.

As I read the two papers, the options provided are to repeat last year or two more levels of increasing restrictions for all fisheries that harvest king salmon. At this point I am unable to select options for any user because I do not know what will happen next year. There are three key concepts that I would like to see applied to all fisheries that are discussed in these 2 papers.

1. ADFG should be able to continue to manage all the affected fisheries by Emergency Order (EO). This allows for flexibility and quick response either way, up or down. I do trust the local region managers, especially in my own fishery (trolling).

2. I do not want to see non directed chinook fisheries unnecessarily curtailed for any user group. In particular, for trolling, I want to see the coho season open on July 1. I want to see the Icy Straits – North Chatham chum fisheries open on or before June 15.

3. Where possible, I would like to see chinook opportunities that have minimal impact on the stocks of concern made

available. These opportunities would occur in places of historical very low encounter rates with stocks of concern.



PC064  
5 of 5

ADFG does address all three of these concepts in the two draft papers.

This concludes my comments on the two draft action plans. Thank you all for reading my comments and thanks to ADFG for publishing the draft papers in time for me to submit written comments.

James Carter Hughes

FV Astrolabe

Sitka Alaska



Submitted By  
James Fischer  
Submitted On  
12/28/2017 3:47:34 PM  
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#### 2018 Management Plan Comments from a New Fisherman:

Dear Board of Fisheries,

In January of 2017, after a lot of preparation, research, and thought, I decided to invest in a power troll boat and permit. This past April, I got to spend two amazing months fishing with my boat's former (now retired) owner, an excellent fisherman. The spring troll fishery was an ideal time for this. Though we were subject to some unexpected limitations this year, I was grateful to be on the water learning from a great man. For newer fishermen and deckhands, especially those of us who live in Alaska, the spring troll fishery doesn't just extend our income earning potential into a safer, less competitive environment, its slower days and lower numbers allow time for instruction and practice. New fishermen like me simply don't catch fish as efficiently as our seasoned colleagues. We depend on bigger windows of time where effort can compensate at least a little for our inherent inefficiencies. If there is to be a future for fishing, there has to be an entry point for new fishermen. The traditional spring fishery, especially in light of short summer openings, is an important time for us.

I understand that at-risk stocks are passing through our waters in the spring, and I fully support conservative measures to protect these stocks. But I also know that there are many areas where few to no fish from at-risk stocks are caught. This is why ADFG allows Sitka's large charter fleet to fish throughout the spring, and why Sitka's salmon derby continues to be held. Like commercial fishing, these things are important parts of our community and I'm glad that they can continue. If it's ok for some user groups to fish for Sitka king salmon in the spring, though, I would think the same could be said for the troll fleet, or vice versa. As I studied the 2018 action plan, I noticed that the troll fleet is set to be subject to much broader restrictions (time and area) than other user groups, some of whom target the same fish in the same areas. I would ask that data be applied consistently to conservation measures across user groups for the benefit of the fish and the livelihoods of the people who depend on them.

The treatment of the troll fleet in 2017 was something that I, like many others, wasn't ready for. This was accentuated by the recent investment I'd just made. But I was encouraged by the grace and patience I saw in our fishing community despite what was for many of us a very difficult time. I've been very impressed by the level and tone of discourse at the Advisory Committee level in our community. And I've been grateful for groups like ALFA and ATA that provide forums for discussion and training from which new fishermen benefit enormously. However, I've been discouraged by what seems to be a disconnect between ADFG management and our fishing community. This has included inconsistent use of data by ADFG, abrupt changes in management strategies, limited time and opportunities for comment and interaction, and failure to share critical data even as it impacts management decisions. Our futures are all linked, so I ask that we move forward in substantial ways together.

Thank you very much for the work you do to protect the resources that we depend on. And thank you for your consideration of these comments from a new fisherman; concerned, excited, and hopeful.

Sincerely,

James Fischer



Submitted By  
jared  
Submitted On  
12/28/2017 8:44:22 PM  
Affiliation  
fisherman

I am only going to be submitting comments on a few of the many proposals that have been submitted this board cycle. I would like to make a general statement that I find a few of the proposals in this cycle offensive. As a seine stakeholder, I have never even considered submitting a proposal that would take wild stock area away from gillnet stakeholders to benefit myself. I believe these types of proposals should be opposed regardless of the beneficiary.

#### **PROPOSAL 54**

##### **5 AAC 32.125. Lawful gear for Registration Area A.**

Reduce the maximum number of pots per vessel in the Southeastern Alaska Area commercial Dungeness crab fishery from 300 pots to 240 pots.

Oppose: This proposal does not guarantee less gear in over saturated areas. There is nothing to stop more permit holders from moving into the over saturated areas once the number of pots there has been reduced. Furthermore, I believe this will lead to permit holders feeling stuck in such known areas. Fisherman would have less pots to explore with, which would increase the time and expenses of exploratory fishing. In conclusion the likelihood and incentive for exploratory dungeness crabbing would be reduced, while the goal for reducing saturation in overly saturated areas would not be met.

#### **PROPOSAL 55**

##### **5 AAC 32.125. Lawful gear for Registration Area A.**

Increase the maximum number of pots per vessel in the Southeastern Alaska Area commercial Dungeness crab fishery from 300 pots to 400 pots.

Support: Although I acknowledge that there is possibility that latent permits may enter the fishery as "additional" permits, I still think this is a good idea. At a 1/3 redemption rate it would not take very many permits being "stacked" to reduce the overall number of pots in the water. It would also be a good entry option for crew members, allowing them the ability to purchase permits to be used on the vessel they are working on.

#### **PROPOSAL 166**

##### **5 AAC. 33.366. Northern Southeast seine salmon fishery management plans.**

Allow a weekly commercial fishery targeting pink salmon with purse seine gear in District 12.

Support: I have been seining in Northern Southeast since 1999. I believe the current management plan is not working. I don't think this will magically fix everything, but it is a good idea (from a fisherman that knows as much about the north end as anyone), and a great start.

#### **PROPOSAL 167**

##### **5 AAC 33.350. Closed waters.**

Close waters beyond one half mile from shore in Districts 12 and 14 to commercial fishing for salmon with purse seine gear.

Oppose: I am not sure what to think about this proposal. The way it is written it sounds as though [REDACTED] is trying to be helpful, and give us more opportunity, but the reality is that this proposal would be devastating to our seine fishery in sub-districts 112-14, 112-16 and sub-districts 114-25 and 114-27. Our fishing opportunities are already very limited in Northern Southeast. Pink salmon tend to come in "pulses", both on and off the beach. Restricting us to 1/2 mile would have a severe negative impact on access to pink salmon in sub-districts 112-14, 112-16 and sub-districts 114-25 and 114-27. I can not be certain why [REDACTED] felt compelled to submit this proposal, but given that he is a SE gillnet stakeholder, I have my suspicions.

#### **PROPOSAL 168**

##### **5 AAC 33.350. Closed waters.**

Close certain waters of Districts 12 and 14 to commercial salmon fishing with purse seine gear.

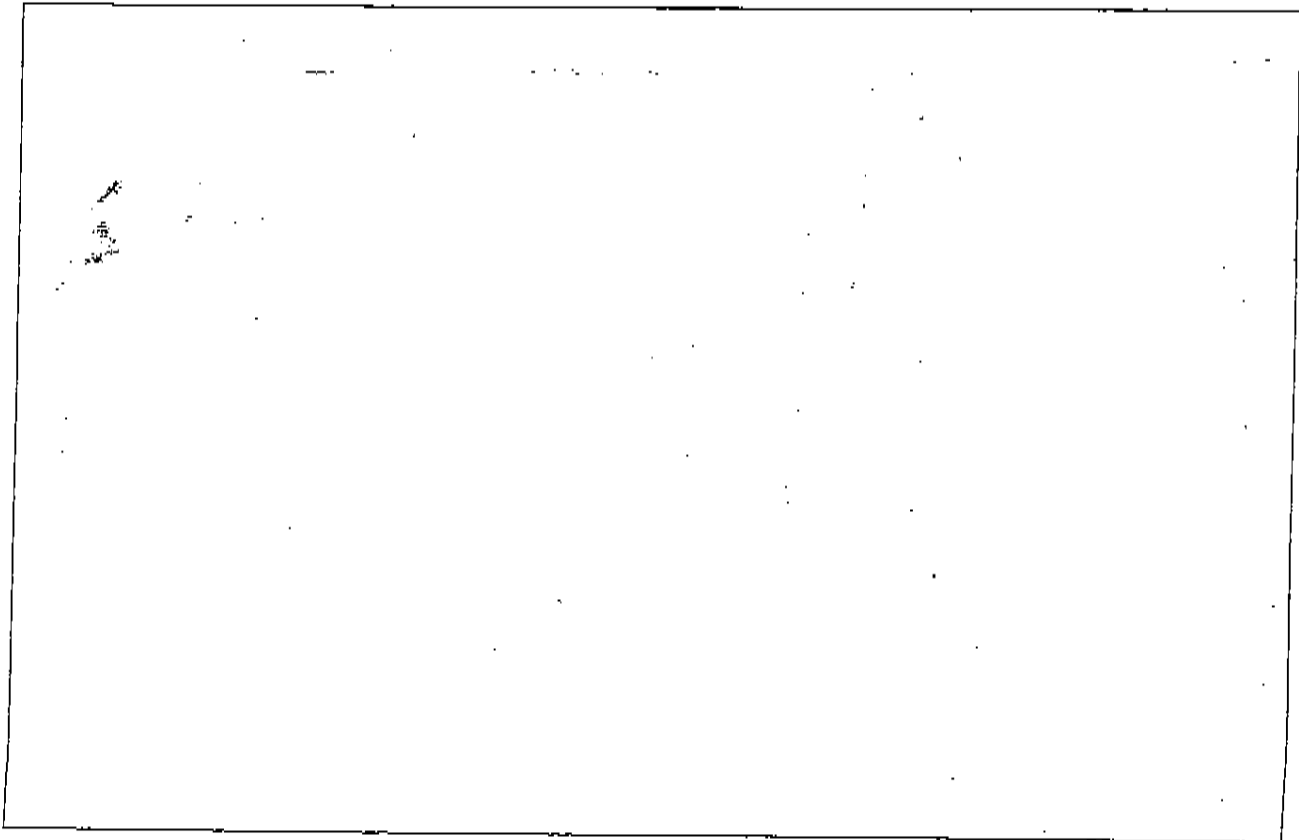
Oppose: Although I share [REDACTED] concern about recently declining Chinook stocks, there is zero science to support his theory that this proposal would aid in their conservation, and thousands upon thousands of seine fish tickets from districts 12 and 14 to show that the seine fleet harvests an infinitesimal amount of Chinook salmon in these areas. I do find it interesting that [REDACTED] is more than willing to eliminate a seine fishery that is persecuted in Icy and Chatham straits, but did not put in a similar proposal to close gillnetting in District 11 and 15, where the Chilkat and Taku rivers are located. Perhaps [REDACTED] a reason for this, other than the fact that he is a SE gillnet stakeholder, maybe he will be so kind as to clarify his reasoning during his testimony.

To: ADF+G Bands Support

Company: \_\_\_\_\_

Fax #: 907-465-6094Date: 12/27/17From: Jean Arnold# of pages 3 including coverRe: BoF SE AK Comments of Proposals 98, 99, 105, 106, 99,  
and 104

## Message





Dear Board of Fisheries

I support proposal 98, 99, 105, and 106. I am strongly opposed to proposals 94 and 104. As part of my comments I've attached a letter to the editor of the Sitka Sentinel that I submitted in August of 2017.

Thank you for your time.

Jean Arnold

Page 2, Daily Sitka Sentinel, Sitka, Alaska, Wednesday, August 30, 2017

## Letters to the Editor

### Fish Food

Dear Editor: Kings are in trouble. They're starving. Most fisher groups are asked to help. Commercial, sport, charter and subsistence fishers accept greatly reduced harvest levels to protect the resource.

But for one group of mostly Lower 48 boats, it's "business as usual." Sitka sac roe herring permit holders still continue to get the same allocation for 20 percent of our herring biomass.

That's salmon and other game fish's food.

Jean S. Arnold, Sitka







**ANB/ANS Grand Camp**  
Portland, OR    October 2017



### **Resolution #17-01**

#### **Title: Restoring Subsistence Priority for Herring**

WHEREAS, Pacific herring are considered an ecological keystone species for the role they play in transferring energy for primary and secondary producers to upper trophic level species, and

WHEREAS, Pacific herring have been utilized by Alaska Natives since time immemorial and are considered an ecological keystone species, and

WHEREAS, subsistence herring egg harvest surveys conducted by the Alaska Department of Fish and Game's Division of Subsistence (DoS) that in the last eight years subsistence needs have been met less than 50% of the time, and

WHEREAS, the results of the DoS subsistence herring egg harvester surveys show that the State of Alaska has failed to provide adequate opportunity for subsistence harvesters to meet their needs, and

WHEREAS, twice in the last 6 years the State of Alaska has grossly overestimated the spawning biomass of the Sitka Sound herring stock resulting in a flawed guideline harvest level and put the future of the stock and the ability of subsistence harvesters to meet their needs at risk.

NOW THEREFORE BE IT RESOLVED, that the ANB/ANS strongly support 2017-2018 Board of Fish proposals 98, 99, 105, and 106, and strongly recommend that the Board of Fish do pass these, and

BE IT FURTHER RESOLVED THAT the ANB/ANS vehemently opposes 2017-2018 Board of Fish proposals 94 and 104 and recommends the BoF eliminate these proposals

BE IT FINALLY RESOLVED, that the ANB/ANS strongly supports 2017-2018 Board of Fish proposals 98, 99, 105 and 106 and recommends the BoF adopt these proposals.

/s/ Sasha Soboleff, Grand President  
Alaska Native Brotherhood

/s/ Cecilia Tavoleiro, Grand President  
Alaska Native Sisterhood

/s/ Devlin Anderstrom, Grand Secretary  
Alaska Native Brotherhood

/s/ Carol Duis, Grand Secretary  
Alaska Native Sisterhood



Submitted By  
Jeff Budd  
Submitted On  
12/9/2017 7:15:14 AM  
Affiliation

Phone  
9077474821  
Email  
[jbudd3500@gmail.com](mailto:jbudd3500@gmail.com)  
Address  
PO Box 1351  
Sitka, Alaska 99835

I am in support of Proposal 99 (submitted by STA) to reduce the commercial catch for conservation, and opposed to proposal 94 & 104 which would roll back subsistence opportunities).

Submitted By  
Jeff Budd  
Submitted On  
12/9/2017 7:11:32 AM  
Affiliation

Phone  
907 747 4821  
Email  
[jbudd3500@gmail.com](mailto:jbudd3500@gmail.com)  
Address  
PO Box 1351  
Sitka, Alaska 99835

Dear Board of Fish, I am writing to ask you to be be very conservative in your herring catch limits. To my mind the entire eco system relies on herring for their support in one way or another. To continue to over fish herring is a long standing mistake. I know it is a million dollar fishery and big money talks - but from my reading there needs to be a major cut back in the fishery to preserve it and bring it back to the past levels. You will need to have a backbone to do that. Thank you. Jeff Budd



Submitted By  
Jeff Farvour  
Submitted On  
12/28/2017 11:30:30 PM  
Affiliation

December 28, 2017

Dear Members of the Board of Fish,

My livelihood is 100% dependent on commercial fishing of which trolling makes up the bulk of that income. I live year around in Sitka and love it here. For many of us there are few options for jobs as is the case in many of Alaska's coastal communities. Many of us did not have a leg up or family to guide us into fishing but we are dependent on the resources and committed to long term sustainability of them. My 8 years serving on the Advisory Panel to the North Pacific Fisheries Management Council gave me clarity to insights of the many aspects of decision making that foster the managing of fisheries and a deep appreciation for our Board of Fish and Game members and process.

As you know, many of the proposals you'll be considering can have serious consequences not just for existing fisherman but for future fisherman as well. Which brings me to my point of asking that as you go through your agenda and deliberate to please keep the well documented declining access of young Alaskan's to our fisheries at the forefront of your considerations.

A couple years ago, I gave a presentation at a fisheries workshop on how policy decisions can affect access to fisheries. I'd be more than happy to share that with you.

#### **Draft Chilkat/King Salmon and Unuk Action Plans (AP):**

First off, I'd ask the Board for fair and equitable treatment of all sectors in bearing the burden of conservation of SE wild chinook while respecting the allocations to the sectors and ensuring that any action taken under the APs or otherwise do not affect the overall allocation. I fully support and depend on conservation based management for king salmon and all of our fish for that matter. It is the underpinnings of the successes in fisheries management. However, the 2017 summer troll season was disastrous for those of us that depend on King Salmon. I know that biology is uncertain but some measure of predictability and stability needs to be in my business plan. I could not predict being literally cut off from catching 20% of our allocation, about a \$2.3M loss to the fleet in ex vessel alone in addition to a nearly full June spring troll closure. This happened right after I upgraded from a smaller wood boat to a fiberglass boat that cost 4 times what the old wood one was worth. Significant losses also occurred to processors, to the State and communities through raw fish tax. Consequently, at the same time the sport fleet was exceeding their allocation by what looks like 19%. On its face this looks like a reallocation with wide spread negative impacts for trollers which is one of Alaska's most important salmon fisheries on a resident basis. I ask that you address this problem through in-season management for the non resident sport sector with as little impact on resident sport fisherman as possible.

If the Board decides that using options contained in the AP's is the best approach for addressing this issue then I would defer my comments to the work and comments that the Sitka AC has done on the APs. However, I do believe that a much more reasonable decision for the Board is for a more surgical approach that is lined out in Mr Tad Fujioka's detailed comments (and likely others) on this matter. Doing so would achieve the necessary conservation goals and have far less economic consequences.

**Proposals:** In general, I find myself supporting all the recommendations made by the great work of the Sitka AC with an emphasis of:

**Support:** 116, 127, 129, 137, 144, 173, 174, 176, 177, 180

**Support 181:** This proposal is important to realizing more value per king since kings are larger and ex vessel is higher in August and it would provide more fresh troll caught kings through out the summer. Additionally, I believe the proposal would help provide opportunity to newer participants in the troll fishery who were not able to fish effectively in the July derby opener, because of weather and/or experience giving them one more chance at making up what they missed in July. These scenarios are ever more important as our fisheries become increasingly difficult for young folks to enter and be successful at.

**Oppose:** 113, 117-123, 127, 132, 133, 134, 139, 146, 178

In closing, I'd like to thank the Board for your dedication to this great deliberative process and welcome you to Sitka.

Sincerely, Jeff Farvour Sitka AK



Submitted By  
Jeff Wedekind  
Submitted On  
12/28/2017 3:39:20 PM  
Affiliation  
Chinook Shores Lodge  
  
Phone  
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Address  
119 Potter Road  
PO Box 6555  
Ketchikan, Alaska 99901

**RE: UNUK RIVER KING SALMON ACTION PLAN 2018**

I own and operate Chinook Shores sport fishing lodge located in Clover Passage, West Behm Canal since 2005. We lodge up to 28 anglers, operate seven fishing boats, employ 8 people and bring approximately 600 non-resident anglers to Ketchikan May-September.

There are five other similar size or larger fishing lodges located in West Behm Canal along with two marinas, and about 30 smaller charter operators who pump tens of millions of dollars into Ketchikan's economy each summer. All these businesses benefit or rely on fishing King Salmon in Clover Pass and West Behm Canal from May through mid-July when all other salmon species are not yet available. Clover Passage has long been an angler's paradise because it offers excellent fishing opportunities in protected waters so anglers can safely fish during poor weather conditions.

Closing all West Behm Canal to sport king salmon fishing would have a very negative impact on the afore mentioned businesses. I would expect a very substantial benefit to the resource to warrant such drastic measures but I fail to see what it would accomplish?

**Unuk River Chinook Harvest Rates from Table 1 of the DRAFT 2018 Action Plan.**

	5-yr Ave 2007-11	5-yr Ave 2012-16	Harvest Growth	% Increase
Troll All	.19	.34	.15	79%
Net All	.03	.17	.14	466%
Sport All	.05	.05	0	0

Commercial net and troll fisheries have increased Unuk Chinook harvest rates by nearly 30% in the past five years. Sport fishing harvest of Unuk River Chinook has remained at 5% over a ten year period and has dropped to 3% over the past three years which coincides with emergency orders beginning in 2014 restricting daily bag limits for West Behm Canal.

**I agree with Action #1 - Sport Fishery, Option A - Status Quo** and agree that the EO restrictive daily bag limit could be increased to a larger area through which Unuk Chinook migrate. **I strongly oppose closing more waters of Behm Canal to further reduce the insignificant sport harvest of Unuk River Chinook.**

I am unfamiliar with Action #2 - Commercial Fishery Options, however, it is evident that Option A Status Quo is not adequate to reduce the Troll and Net harvest rates so Options B and C should be considered.

Action #3 - Personal Use Fishery seems insignificant to escapement goals and I have no comment on this option.

Sincerely,

Jeff Wedekind, President Chinook Shores Lodge



Submitted By  
Jenn  
Submitted On  
12/19/2017 4:49:49 PM  
Affiliation

Phone  
9077475063  
Email  
[sitkamama@gmail.com](mailto:sitkamama@gmail.com)

Address  
2212 Sawmill Creek Road  
Sitka, Alaska 99835

Dear Board of Fisheries Members,

For the past 17 years, I have lived right next to the ocean in Thimbleberry Bay, Sitka. During this time, I have watched the annual herring spawn steadily decline.

When my firstborn son was a newborn back in 2002, I remember holding him in my arms as I sat on the beach in front of our home watching the ocean brimming with herring. Sea lions cruised past us at arms reach, filling their bellies with herring while the sound of birds celebrating the abundance surrounded us like a joyful symphony.

My sister lives in an old, abandoned fishing village in Prospect, Nova Scotia. A place where the ocean was once also alive with the abundance that only a healthy ocean can offer. Every year, during "herring time" I would tell my sister how it was my favorite time of year in Sitka. I would try to describe to her the magic of watching Thimbleberry Bay come alive with every kind of sea life you can imagine.

In 2003 or 2004 (I cannot recall which year), there was a commercial sac-rope fishery opening right in front of our cabin. We watched one seine boat ground on the reef in front of our home in it's haste to find the big patch. Thankfully, it got off without any damage or oil spilling. And what I remember most clearly is how shocked I was to listen to the fish vacuum actively unloading one seine boat's haul—all day... and all night long. Think of that. All day, and all night. One tiny bay.

Since that fishery, I have watched our bay steadily turn into a herring ghost town. Instead of watching our bay come alive each spring, turning a wonderful milky turquoise color, and covering our beaches with eggs, now, we might not even know the herring were in Sitka Sound at all. The herring haven't shown up for the past several years - at all. The gulls don't sing, the eagles don't come, the sealions are elsewhere, the waters don't turn white, and we don't see any eggs on our beaches.

Honestly, this is one of the most tragic things I have experienced in my lifetime. I keep hoping that the commercial sac-rope fishery will just shut down so we can give the herring time to recover and that my son, who is 15 now can get to experience the herring in our bay once again.

Now, my story, as significant as it is to me and to the other residents of this bay, pales in comparison to the herring stories the Tlingit people have to tell. The Tlingit have been here tens of thousands of years and in all that time they did not mess up the herring resource. When I think of that and compare it to the decline in herring that I've seen within 17 years of living in my home, I am horrified. We need to listen to the Tlingit people and recognize that they are much better stewards of this resource than we are. What they have to say needs to be honored. They obviously understand resource management!

Not only do I support Proposal 99, to cap the sac-rope fishery at 10% of biomass, I feel it is the minimum that should be done.

In fact, what I really think ought to happen is to completely shut down the commercial sac-rope fishery. With the massive increase in whale numbers in Sitka Sound combined with the overwhelming number of Sitka residents who can personally testify to witnessing a massive decline in herring over the past decade (and longer), it seems only reasonable that the Board of Fisheries would err on the side of caution when it comes to such an ecologically critical species as herring.

Thank you very much for considering my comments.

Jenn Lawlor



Submitted By  
Jim Borbridge  
Submitted On  
12/28/2017 2:49:47 PM  
Affiliation

Phone  
9662991

Email  
[parallel1@gci.net](mailto:parallel1@gci.net)

Address  
446 Katlian St  
Sitka, Alaska 99835

My name is Jim Borbridge. I was born and raised in Sitka. I have fished on a commercial troller and have worked for processors here in Sitka. I am also a subsistence user of herring and herring roe. I am writing to express my concern about the shrinking biomass of herring in Sitka sound and the surrounding area. Herring, though not recognized as a foraging food, comprises a large portion of the diet used by salmon, halibut and other fish fished for commercially in the Sitka area. There may not be a correlation or maybe there is a correlation between the lower population of fish caught and the lower biomass of herring in the Sitka Sound. Logic and common sense would suggest there is a correlation.

I have done my share of herring fishing and herring roe gathering as a native of Sitka and still look forward to the seasonal return of herring. I would like to see a reasonable management of the herring population to bring back the herring biomass as it once was. I can remember going past Star Gaven point and seeing a whi



Submitted By  
Jim Conrad  
Submitted On  
12/27/2017 9:29:20 AM  
Affiliation

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Address  
3723 Brand Crest  
Encinitas, California 92024

## Proposal 165

I oppose this proposal. The reasons stated in this letter are as relevant today as they were in 2012.

**RE: Tsiu River** March 15, 2012

Ladies & Gentlemen,

I was very disturbed to read a recent article in the Ketchikan newspaper regarding the reversal of a controversial board decision aimed at reducing sport-commercial conflicts on the remote Tsiu River near Yakutat. It appears to me that amended Proposal 30L, to close a portion of the river to commercial fishing to provide a sport-only zone, was a very reasonable and equitable solution.

When I originally learned of its 4-3 approval I was ecstatic. However, when I later learned that the Board of Fisheries had apparently later caved to commercial fishing interest pressure (disguised a new information but really wasn't) and reconsidered the proposal, subsequently voting 3-4 to overturn the original approval of amended Proposal 301, I was stunned. I thought that this type of exercise of raw political pressure was reserved to the lower 48 states and specifically to Chicago. To say that I'm disappointed would be a gross understatement.

I am from California I look forward to at least one or two annual trips to Alaska to fish, with my favorite destination being the Tsiu River. I typically spend around 55,000 on each of these trips and my half dozen fishing buddies do the same. I know that we're just the tip of the iceberg and if you extend that type sport fishing expenditure to multiple fishing lodges on the Tsiu River for an entire season, you're looking at several million dollars per year. It seems to me that sport fishing's economic contribution to the Tsiu River fishery shouldn't be trumped by commercial fishing. Sport fishermen don't appreciate being harassed by commercial harvesters, as they heard salmon into nets using boats. Let the commercial harvesters have their section of the river and let sport fishermen have theirs. That's the equitable solution and that's what amended Proposal 301 is all about.

In conclusion, I urge you to reconsider your actions and to approve amended Proposal 301.

Jim Conrad

3723 Brand Crest

Encinitas, CA 92024-5505



Submitted By  
Joe Daniels  
Submitted On  
12/28/2017 4:17:42 PM  
Affiliation

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5037046466  
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Address  
507 Katlian St.  
Sitka, Alaska 99835

To whom it may concern,

I am a commercial salmon troller based out of sitka, ak and adamantly opposed to any spring closure of Chinook salmon. The proposed access restriction to this resource will have devastating effect on my fishing business. I have a very legitimate concern for the future of my business and will not be able to ride out what I estimate as around a 40 percent reduction in my gross salmon production if I am prohibited from access to Chinook in the Spring. I urge the powers that be to reconsider prohibiting my access to the only resource I own a permit to harvest. It seems ADFG has zero concern for what is at stake here and is not being fair to Commercial Fishermen and not considering ways to get us access to the resource that we are entitled to.

Sincerely,

Joe Daniels

F/V Amnicon, Sitka AK

503-704-6466

507 Katlian St,

Sitka, AK 99835





**From:** Joe Lindholm  
**To:** spawn on kelp--SE ALASKA  
**Subject:** Friday, September 29, 2017 9:44:50 AM  
**Date:**

---

I am in favor of an alternate style of fishery for the SE roe herring fishery. The existing permit holders would have the option of either participating in the existing herring for roe fishery, or convert to the proposed spawn on kelp fishery.

The pluses to this are: A) The fishers that elected to stay in the herring fishery would have a much better chance to "make" a season because the fleet would be smaller

B) The fishers that elected to pursue the roe on kelp fishery would not hurt the existing fishery in any way because there would be no killing of fish...

C) The permit would generate more revenue to the state (thru higher grosses) and permit values would go up

D) Additional employment would be enjoyed (most likely by the community of Sitka)

The minuses are: There is some belief that this fishery would dilute the existing roe on kelp market. The open pond method of harvesting kelp produces a much thinner product, therefore the product is not the same.

Arguments there will be, but substantiation of this is available. It can be likened to frozen salmon versus canned salmon - both salmon but different markets.



Submitted By  
Joel Randrup  
Submitted On  
12/27/2017 10:00:13 AM  
Affiliation  
Fisherman

To the Board of Fish,

I support proposal 235.

Proposal 235, Southeastern Alaska Area Dungeness Crab Fisheries Management Plan and Fishing Seasons for Registration Area A. I agree with the comments used by the board in the proposal under What is the issue you would like the board to address and why? I have a southeast drift gillnet permit and a Dungeness crab permit to give me an economic opportunity. That opportunity was lost this season because the Dungeness crab season was cut short. I started crab fishing in a slow area this summer, and I correctly guessed that it was slow fishing in other areas so the season would be cut short. I put my pots away and fished for salmon. The salmon fishing area was not near the crab fishing and I put my pots away so I would not be concerned about them being in the water when the season closed. I know of several permit holders in the area I crabbed that did the very same thing. I also lost economic opportunity this fall because the season was cut short. I support this proposal and thank the Board of Fish for generating it.

Thank you,

Joel Randrup



Submitted By  
Joel Randrup  
Submitted On  
12/27/2017 11:59:56 PM  
Affiliation  
Fisherman

To the Board of Fish,

I support proposals 141, 154, 156, 157, 169, and 170. I own a southeast drift gillnet permit and I am a USAG member, however, these comments are my own. These proposals submitted by USAG appear to address in a fair and balanced manner the imbalance of the gear groups in both the wild and enhanced stocks as well as maintaining conservation measures for sockeye.

Thank you,

Joel Randrup



Submitted By  
Joel Randrup  
Submitted On  
12/28/2017 8:51:44 AM  
Affiliation  
Fisherman

To the Board of Fish,

I support proposal 160, Closed waters.

Thank you,

Joel Randrup



Submitted By  
Joel Randrup  
Submitted On  
12/28/2017 9:18:46 AM  
Affiliation  
Fisherman

To the Board of Fish,

I support proposals 195 and 196, General provisions for seasons and bag, possession, annual, and size limits for the salt (and fresh) waters of the Southeast Alaska Area. To manage our fisheries sustainably we have to know all the outputs from that particular fishery. The unguided sport fisherman is not fully or at all accounted for so we don't know what they take home. The commercial and charter fisheries are managed using fish tickets and a log book, respectively. There needs to be a more accurate method of tracking the outputs instead of the statistical model being used, the creel survey, which misses the unguided sport angler that never goes to a dock. In the absence of implementing a tracking system the annual limits would be a very good start.

Thank you,

Joel Randrup



Submitted By  
Joel Randrup  
Submitted On  
12/28/2017 10:28:39 AM  
Affiliation  
Fisherman

To the Board of Fish,

I oppose proposal 142, District 13: Deep Inlet Terminal Harvest Area Salmon Management Plan submitted by NSRAA. This modification to the rotation schedule between the net groups is excessive and not a fair way to address the enhanced salmon allocation imbalance. A 1:1 rotation is both fair and was done before.

Thank you,

Joel Randrup



Submitted By  
Joel Randrup  
Submitted On  
12/28/2017 12:47:05 PM  
Affiliation  
Fisherman

To the Board of Fish,

I oppose proposals 140, 143, 145, 153, and 155 submitted by SEAS. These proposals are excessive in trying to correct the enhanced salmon allocation imbalance, they do not address the wild stock salmon allocation imbalance between the gear groups, and are incorrectly asking to remove the conservation measures for sockeye salmon. Smaller adjustments in the enhanced salmon allocation seem more reasonable as suggested in other proposals.

Thank you,

Joel Randrup



Submitted By  
Joel Randrup  
Submitted On  
12/28/2017 5:50:18 PM  
Affiliation  
Fisherman

To the Board of Fish,

I support proposal 103, Management plan for herring spawn on kelp in pounds in Sections 3-B, 12-A, and 13C and District 7. The reasons given for support that are listed in the proposal are valid for the economic value, and the bait fishery was not prosecuted for many years until just recently. However, the value of the bait fishery may not be as drastically impacted by changing the allocation of the guideline harvest level as proposed, but only switched to favor the pound fishery. I would suggest to change the allocation of the GHL to 60% S.O.K. and 40% bait with the leftover bait harvest, if any, allocated to the S.O.K fishery. This may help add economic value to the S.O.K. fishery as suggested, and in times of low herring abundance there could be prosecution of both fisheries.

Thank you,

Joel Randrup





Submitted By  
Joel Randrup  
Submitted On  
12/27/2017 6:08:28 AM  
Affiliation  
Fisherman

To the Board of Fish,

I oppose proposal 54 and 55.

Proposal 54, Lawful gear for Registration Area A. This proposal would likely increase the fishing pressure on the grounds because there would be more pot lifts if permit holders have less pots to fish. The value of the permit would be affected due to the proposed reduction of pots because the permit/pots are usually sold as a package. I own a 300 pot permit and this proposal would reduce more pots from my permit which is an unfair economic hardship and would reduce my business assets. Sea otter predation is a state and federal problem that is not being managed adequately. The crab fleet should not be penalized for inaction to address the economic and social impacts the invasive sea otter has on all Alaskans. The pot reduction concept is not a logical way to manage the sea otter because pot reductions would continue until we don't have enough pots to make a living. I oppose this proposal.

Proposal 55, Lawful gear for Registration Area A. This proposal would unintentionally increase the pots in the fishery if permit holders do not choose to stack permits. According to the tiered system we currently have in place if the maximum number of pots a vessel can fish is 400 then the tiers would change to 400/300/200 & 100? I think the regulations from CFEC is 100%/75%/50% & 25% of the maximum number of pots allowed? Crab fisherman are crowding each other because we have lost grounds due to sea otter predation and the absence of a sea otter management plan. If the soak times are short then possibly we could add another escape ring to the pot which may give sub legal crab more opportunity to escape. I agree with the concept of permit holders stacking permits to voluntarily reduce their pots and not having a reduction forced on the individual permit holder, however, I oppose this proposal as written.

Thank you,

Joel Randrup



Submitted By  
Joel Steenstra  
Submitted On  
12/23/2017 1:13:31 PM  
Affiliation

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To Board of Fisheries,

My name is Joel Steenstra. I am a power troller (FV Glory) and a Charter business owner (Alaska Wide Open Charters) out of Craig, Alaska. I wish to comment on the chinook action plans that will be before the board.

I do not agree with the ADFG plans to do a fleet wide shut down of the troll fleet in mid march which is in option B and C. Mid March through the end of the winter troll fishery is a very important time for the smaller boats in the power troll fleet out of Craig and other communities. The weather gets nicer and we have fish show up in numbers where it is profitable to leave the dock. A mid March closure would cause economic hardship for the small boat fleet. With record high prices it is important to keep the fleet fishing particularly after last years shut down of the second king opening. I would purpose to the board to ask the ADFG to consider keeping certain areas open for the last part of the winter fishery, where trollers are less likely to intercept kings from the rivers in trouble. My suggestion would be the mixed stock areas like 103, 104, 113, and 183. There is too big of an economic loss to trollers for the ADFG to not consider a plan like this. This would benefit the entire troll fleet as boats in communities like Ketchikan and Juneau could travel to these areas that are open. It might be years before these rivers rebound due to ocean conditions so we need a plan that doesn't kill the small boat troll fleet while we wait for ocean conditions to improve.

For the spring hatchery openings, it is also important to give the troll fleet as much fishing opportunity as possible. Every effort should be made to identify areas with a lessor chance of intercepting natural AK kings, and they should be opened, expanded, and added too to provide economic opportunity to the troll fleet.

Thank you for your consideration,

Joel and Leanne Steenstra



Submitted By  
John Clark  
Submitted On  
12/19/2017 12:20:05 PM  
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Proposal 63. Although an 'experimental fishery' could provide minimal data on the distribution of small populations of red king crab, careful consideration of what type of information should be collected, distribution of effort, and other factors would make this data much more useful. Many of these red king crab stocks are likely distinct and marginal, resulting in likely overharvest if a fishery is simply allowed to proceed without specific plans and direction. There are no estimates of appropriate guideline harvest levels or a plan on how effort will be distributed. I would recommend that, if information on southern red king crab stocks is a high priority, ADF&G and interested users should devise a more coordinated and considered research plan to collect this information.

Proposal 64. I strongly oppose this change in management guidelines until ADF&G can develop a red king crab management plan that ensures a healthy red king crab resource, MSY strategy, and allocation among user groups consistent with Alaska Statutes and Constitution. A 50,000 (or 100,000) lbs guideline harvest level would mean that abundance is very low region-wide and likely only a few, or even one survey area would be open to harvest. Only a small fraction of a survey area is good red king crab habitat and trying to crowd over 60 boats, each with 20 pots, into a limited area creates difficulties for both management and the fleet. The contribution of unsurveyed areas to the total guideline harvest level is also highly arbitrary and suspect. For example, in 2017, over 67% of the harvestable biomass (135,000 lbs) was apportioned to unsurveyed areas with no information on stock health or abundance. In past years this percentage was around 30% (this is the average percent of the historical harvest coming from unsurveyed areas). The 200,000 lb threshold was achieved because of this dubious increase in harvestable biomass from unsurveyed areas. Commercial harvesting at lower threshold levels would significantly increase the potential for gross management error, overharvest, and simply allowing a fishery by arbitrarily increasing harvests in unsurveyed areas.

Proposal 234. I strongly support this proposal for the reasons presented by ADF&G. The only way to competently manage resources that continue to be in a less than healthy state is to collect information on the harvest of this resource, at a minimum.

Proposals 137, 185, 188, 190, 191, 192, 194. I support these proposals which will provide more reasonable opportunities for Alaska residents to achieve personal use needs. Currently, most of the personal use harvest of salmon fall under sport fish regulations, which limits the number of fish and type and amount of gear used. This in turn limits the ability of many Alaska residents to achieve full use of their personal use rights to provide for their families because of time or economic constraints. Each Alaska resident deserves the opportunity to provide a healthy and sustainable fish supply for their families. Concerns over some users who may try and over-exploit the salmon resources can easily be addressed by putting limits on personal use permits. At a minimum, it would be interesting to initiate a personal use fishery as suggested in one or more of these proposals and evaluate the interest in this fishery, the impact of this fishery on the resource and other users, and the ability of ADF&G to competently monitor and manage a more liberalized personal use fishery.



Submitted By  
Mr. John Murray  
Submitted On  
12/20/2017 1:01:03 PM  
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Proposal 99 Support: As amended by the Sitka AC. I believe the language added by Sitka AC reflects the concerns I have those being; 1) conservative /precautionary approach to management of this fishery 2) In Sitka there has a growing predator population -whales and sealions .They take unknown amount of herring.3) I support a more broad ecosystem approach here.Example :see 2) also climate conditions,warming waters and ocean acidfication.

Proposal 116 Support: I feel this is a common sense approach to controlling the growth in guided sport catch of Black cod. It offers controlled growth and oppoutunity without displacing current harvesters.

Proposal 127 Support :This proposal protects the local resident user from encroachment into this fishery by guided charters. Resident should not have to compete with charters for food fish.

Propoal 133 Oppose : This a backdoor way to close trollers out of certain grounds under the guise of conservation.While leavig the gillnet fleet open..Example of this is the chum fishery in Chatham straits/lcy straits areas. This will also be addressed in ADFG Stocks of Concern conservation plan.

Proposal 134 Oppose :I oppose this for some of the same reasons above.Mostly this will be dealt with via ADFG SofC POLICY.

Proposal 173 Support: Good language to let the troll fleet catch returning enhanced chum salmon in District 12/14. See SE Allocation Task Force recommendations.

Proposal 174 Support;Same rational as 173 . this should also help trollers get closer to the Enhanced Allocation Plan percentage.Trollers are way benind in those percentages.

Proposal 178 Oppose:this a reallocation within troll fleet that harms Sitka area fisherman (who are regionwide). While the winter king harvest sometimes closes early there would clearly be other ways to do what this proposal is trying to do in a more fair and equitable manner.

Proposal 179 Oppose:This proposal would disappointedly affect Sitka trollers( who are regionwide trollers) I beleive there are better ways to go about this .

Proposal 181 Support :As amended by Sitka AC(.I wrote this proposal).Please see my five reasons for your support in considering this for APPROVAL.I want to add one more big item as #6 .That being we need this proposal as a means to support 1) the new entrant to trolling 2) the up incomer 3) the fisherman who misses the king harvest during the first July opening. It gives those fisherman another shot to try and help put together a season.Kings can be a big part of ones economic success in this fishery. I would like to support the "new guys " exspeccially because they are the ones who are the future of our fishery.This is not just an issue here I beleive its statewide. Its important to seriously weigh this in deliberations.

Proposal 186 Support: As a clarity issue this is important for all involved.

Proposal 195 Support:While there might not be a conservation problem. I see this proposal as a means to a harvest number by nonresident anglers that reflect a fair amount to harvest.As it stands now under current sport regs a nonresident is allowed a very generous potential daily and possession limits. The question you have to anaswer is.How much is enough ?It is too open ended currently I beleive .One could take a lot of fish when all you have to do is PROCESS the catch and your legal to catch another bag and possession limit.Sorry the wild west daysare over.

Proposal 196:Support Same rational as above.How much is enough?The good old days are over we need to leave some for the critters. Think what is reasonable.



Submitted By  
John Murray  
Submitted On  
12/28/2017 9:46:59 AM  
Affiliation  
self

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Comments concerning SEAK Stocks of Concern Action Plan;

As a longtime resident and a fisherman( troller) living in Sitka I want to make some general comments on this plan.

FIRST :let me state rebuilding these stocks is of PARAMOUNT importance .SECOND: this is a many faceted problem in that it will affects all gear groups in SE. THIRD: these are uncharted waters for most all of us here,in that we have never dealt with SoC before in SE. FOURTH: the outcome of decisions made during this meeting could /will have large economic effects exspeccially to certain gear groups. FIVE: these decisions will be in AFFECT for at least one life cycle of the King salmon 4/5 years.

Something I'd really like you to consider is the concept of rebuilding and conservation of these SoC along with providing opportunities.Please see 5 AAC 39.222 Policy for the management of sustainable salmon fisheries (5) (A).

I believe with good use of ADFG biologist,science folks,other ADFG staff, tools already in the tool bag and intelligent, informed and engaged public participation along with the BOF guidance and direction we can come up with something that works.

Just a couple of more personel comments.I make between 20 to 35 percent of my total fishing income from trolling in the time period set for closure or VERY reduced opportunities in mid March through the end of June per Draft Plans for Unuk,Chilkat,King salmon . Lastly this is a particularly MAJOR hit to new or prospective entrants into the troll fishery. They are the future right along with these SoC.

Thanks for your consideration and dedication to the resoures of the state of Alaska.

In respect to you and the health of SEAK John Murray F/V Sea Bear Sitka



Submitted By  
John Peckham  
Submitted On  
12/28/2017 2:08:59 PM  
Affiliation

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**Mr. Chairman and Board Members,**

**I am opposed to Proposal 156.**

**I have purse seined in SE Alaska since 1975. I was present at the Board of Fisheries meeting at which 5AAC 33.366 was established and at the meeting at which 5AAC 33.363 was adopted.**

**Taken together, these regulations were an attempt to address the highly contentious issue of how much seining should be allowed in upper Chatham Strait and Icy Strait. The main concerns were that surplus pink salmon were going unharvested, that the effects of reduced seine access in the 70's and 80's had reallocated sockeye and chums from the seine fleet to the gillnet fleet, and that any increased seine harvesting, compared to that period, would negatively effect gillnet harvests (and returns) in districts 11 and 15.**

**The intent of 33.366 is clear when read in the context of 33.363. It is to manage the Hawk Inlet shoreline in July in a way that maximizes the available harvest of surplus northbound pink salmon while taking into account the conservation of other species, and to set a limit on the sockeye harvest in order to keep ADF&G from making allocative decisions. The cap itself was not intended for conservation.**

**A set cap, of course, is not very responsive to the strength of the returns, and to the extent 15000 wild stock sockeye is an allocation, then the yearly cap has resulted in the seine fleet under achieving its allocation. The seine harvest has averaged 6500. It would be better if a yearly cap, if necessary, would fluctuate, so that when pink salmon runs are strong a higher inseason cap would be applied. Currently, in some years, little or no pink or sockeye seine harvest occurs in district 12 above Pt. Marsden. I would suggest the regulation be modified so that a rolling ten-year average be applied to determine a yearly cap. This would allow for management that is more responsive to abundance and fairer.**

**The department already has the authority to manage any seine harvest for conservation. There is no evidence that sockeye timing over the long term has changed. There is no management reason to have further restrictions on the seine harvest. Such restrictions are part and parcel of proposal 156 and would result in some years in a substantial under harvest of surplus pink salmon and reallocation of sockeye and chums.**

**Therefore I am opposed to 156. For similar reasons reasons, I am opposed to proposals 157 and 158. The effect of these would further restrict seine harvests on the Hawk Inlet shoreline.**



Submitted By  
John Peckham  
Submitted On  
12/28/2017 4:09:23 PM  
Affiliation

I oppose proposal 169. I have purse seined in Sotheast Alaska since 1975.

Distict 6D should not automatically be open at the same time as the other gillnet areas in district 6. It should not be open at all in August. 6D is a productive area used by the seine fleet in August when pink salmon abundance in district 6 is large enough to allow seine openings. Opening the area to gillnetting would effect pink mangement and would reallocate pink and other species from the seine fleet to the gillnet fleet. Gear conflicts would result when the area would be open to gillnetting at the same time as it is open to seining. ADF&G should comment on conservation if the intent is to have 6D open every time the rest of 6 is open in August.

The assertions made by the proposers are wrong. The gillnet fleet suffers no more time and area closures than the other fleets. In fact, the gillnet fleet has more consistent openings than the seine fleet. Substantial numbers of pink salmon travel through gillnet districts. If they were to target pink salmon more frequently they would catch more pink salmon.



Submitted By  
John Ryan  
Submitted On  
12/28/2017 10:52:21 PM  
Affiliation

PROPOSAL 56 Board of Fisheries, Please change the following regulation as stated: 5 AAC 32.150. Closed waters in Registration Area A. Close waters of Twelvemile Arm to commercial fishing for Dungeness crab, as follows: (11) waters of Twelve-mile Arm west of a line at 55°31.262'N lat., 132°34.141'W long, to 55°30.170'N lat., 132°33.731'W long., and north and east of a line at 55°26.410'N lat., 132°40.050'W long., to 55°26.333'N lat., 132°39.529'W long.; What is the issue you would like the board to address and why? The residents of Prince of Wales Island have continued to see an increased presence of commercial Dungeness crab fisherman in 12-mile arm. The commercial Dungeness crab fleet has seen an increased in sea otters in other areas of Southeast Alaska and very low numbers of Dungeness crab in those areas. The area of Hollis has seen an increase of personal use Dungeness crab fisherman from the communities on the western shore of Prince of Wales. The fisherman of Hollis continues to see lower numbers of crab from the increase of all users. A small increase to the area closed to taking Dungeness crab commercially will continue to allow a sustainable biomass to be harvested by personal use fisherman to supplement the high cost of living and depressed economy on Prince of Wales Island. The commercial Dungeness crab fleet would not be impacted by this small increase to the existing closed fishing area. The Hollis Community Council wrote this proposal for the best interests of the residents of Prince of Wales. I personally fish 12- mile arm and have seen the increase of commerical harvest over the last 8 years because of the increased presence of Sea Otters moving into other area of SE Alaska and decimating the crab stocks. This small increase to the proposal area will continue to allow all residents to enjoy this resource while not in direct competion with the commerical industry.





Submitted By  
John Ryan  
Submitted On  
12/12/2017 12:28:22 PM  
Affiliation

~~To: Board of Fisheries concerning SE and Yakutat Shellfish  
Concerning: PROPOSAL 84

Please amend the following regulation to as stated:

5 AAC 31.136. Closed waters in Registration Area A.

Close additional waters in District 2 to commercial pot shrimp fishing, as follows:

(4) Shrimp may not be taken: in the waters of Kasaan Bay north and west of a line from the northern most tip of Daisy Island located at 55°28.816'N lat, 132°19.379'W long. northeast to a point on Kasaan Peninsula located at 55°30.533'N lat, 132°18.191'W, including all waters of Twelve-mile Arm;

Reasoning: Over the years, District 2 commercial shrimp season has caused a continual downward trend to the shrimp biomass in the waters of Kasaan Bay and Twelve-mile arm to a point where the area can no longer support a commercial fishery.

Beginning with the 2009 ADF&G news release, the shrimp guideline harvest limit or otherwise known as the quota, was reduced from 86,000 pound to 65,000 pound of shrimp in District 2. ADF&G stated the reasoning for the reduction of quota was " due to excessive exploitation rates, declining CPUE, and a decrease in mean carapace length".

In the fall of 2010 commercial shrimp quota in District 2, the district was open for 33 days with a quota of 65,000 pounds of shrimp. A total of 68,893 pounds in total was harvested. In 2011, District 2 was opened again for a quota of 65,000 pounds. Commercial shrimp fishermen harvested 75,425 pounds of shrimp in 20 days. In 2012, the shrimp quota remained once again at 65,000 pounds even though the shrimp fishermen had gone excessively over the quota by 16% the previous year. Commercial shrimp fishermen harvested 74,631 pounds of shrimp in District 2 in 15 days. Once again the commercial fishermen went excessively over the quota by 15% in 15 days of fishing. ADF&G once again kept the 2013 shrimp quota at 65,000 pounds for District 2 even though the commercial shrimp fishermen went excessively over the quota the previous two years. Commercial fishermen harvested 62,250 pounds of shrimp in District 2 in 2013

Beginning in the fall of 2014, the commercial shrimp quota for District 2 was reduced to 52,000 pounds of shrimp. By emergency order, ADF&G closed the waters of Kasaan Bay, Twelve-mile Arm, and Skowl Arm after 12 days into the open season. As quoted by the emergency order, "Kasaan Bay and Skowl Arm (Subdistrict 102-60) is being closed as a conservation measure to protect this localized shrimp stock from additional fishing pressure. Commercial harvest rates have been in decline over the past several years. The pre-season survey the department has conducted over the past four seasons has also shown a precipitous decline in the catch rates of spot shrimp as well as a decline in biological parameters". Commercial shrimp fishermen harvested 50,0826 pound of shrimp in District 2 in 2014 and were allowed to fish commercially for 12 days in an area of low biomass which ADF&G was concerned about.

ADF&G has not opened the waters of Kasaan Bay and Twelve-mile Arm since the 2014 shrimp season. District 2 has remained open for the harvest of shrimp with reduced quotas. The quota was set at 42,000 pounds in 2015, and further reduced to 30,000 pounds in 2016. In 2017, District 2 remained at a 30,000 pound quota.

ADF&G began a new pot gear survey in Kasaan Bay beginning pre-season in 2011. This survey has continually shown a sharp decline of the shrimp biomass. In the 2013 shrimp season, ADF&G began asking commercial shrimp fishermen to fill out logbooks of their catch.

The 2013 October commercial shrimp season for District 2 has left the personal use shrimpers with a low shrimp biomass in Kasaan Bay and Twelve-mile Arm. The shrimp biomass has been extremely slow to increase and has not recovered from the decimation. District 2 itself is a large area; however the commercial fishing fleet focused their efforts in the waters of Kasaan Bay and Twelve-mile Arm in 2013 which are adjacent to the communities of Hollis and Kasaan. Both areas were hard to navigate during the fishery from the large amount of commercial gear.

The area used to receive moderate personal use fishing pressure through-out the year from residents of Prince of Wales Island as well as Ketchikan. However, personal use fishermen numbers have declined rapidly because their catch effort compared to the return is very low. Prince of Wales has a large population of subsistence / personal use users who rely on the land and ocean to feed their families. The island has a high cost of living with a financially depressed economy.

This commercial closure of Kasaan Bay and Twelve-mile Arm is a small percentage of District 2 which runs the eastern shores of Prince of Wales Island south of Narrow Point and north of the US/Canadian border. This area includes all waters of bays and sounds on Prince of Wales Island on the eastern shore, south of Narrow Point. The large commercial vessels can easily navigate these areas open to commercial shrimping and away from the communities of Hollis and Kasaan who rely on a subsistence lifestyle to exist. Commercial fishermen focus on making a profit along with commercial seafood processors/companies. They are not concerned if the rural resident personal use fisherman is harvesting enough shrimp to feed their family.

A regulation closure of the area to commercial shrimping would protect a relatively small percentage of District 2 to allow personal use fishermen to utilize the shrimp resource. The area selected for the closure is in close proximity to the community of Hollis and village of Kasaan. Both places have harbors and boat launches which are utilized by all residents

of Prince of Wales Island with small vessels. Commercial vessels would still be able to fish District 2 in waters not directly adjacent to the communities of Hollis and Kasaan.



I am requiring the Board of Fisheries to enact this regulation change as wrote to protect the personal use shrimp fishery for the residents of Alaska. I feel it's the duty of the Board of Fisheries to protect the shrimp biomass of Kasaan Bay and Twelve-mile Arm for the residents of Alaska not for the continued betterment of the commercial enterprises.



To Board of Fisheries Members:

My Name is Josh Wisniewski I live in Sitka, Alaska, My Address is PO Box 474 Sitka, Alaska, 99835. I am a commercial fishing permit holder. I am also a cultural anthropologist and completed my Ph.D. in anthropology at the University of Alaska, Fairbanks. I been studying issues related to commercial and subsistence marine harvesting in Alaska and Washington State for over 12 years.

These comments are in support of the conservation of herring stocks in Sitka Sound to support long term sustainable harvest opportunities for all user groups I urge the BOF to **adopt** proposals:

98 Reduce Southeast Alaska commercial herring harvest rate (Adopt)

99 Reduce maximum harvest rate from 20% to 10% of spawn biomass (Adopt)

105 Expand waters closed to commercial herring fishing (Adopt)

106 Expand waters closed to commercial herring fishing (Adopt)

Concurrently I urge the BOF to **NOT** adopt proposals which would result in decreased opportunities for subsistence harvesting and increase the rate of commercial herring harvest levels.

94 Reduce amount of spawn necessary for subsistence (Oppose)

104 Repeal waters closed to commercial harvest (Oppose)

107 Establish Herring Spawn on kelp commercial fishery in Dist. 13 (Oppose)

### **1. Archeological and Cultural Context in Support of Herring Conservation**

Human populations have been harvesting herring in Southeast Alaska for at least 9310-7930 years Before Present (BP) based on archeological materials collected from the Chuck Lake Site (45-c4g-237) on Hecate Island in Sea Otter Sound.<sup>1</sup> A bulk sample from the Jamestown Bay Site located in Sitka Sound also known as Site (49-SIT-228) was dated to 780 BP. Of the 199 fish bones recovered in this sample 57% were herring. This data speaks to the deep economic and cultural importance of herring in Sitka Sound.

Traditional Ecological Knowledge (TEK) documentation has identified the active management and conservation of herring stocks in Sitka Sound throughout the Northwest Coast from Southeast Alaska to Washington State. Analysis of traditional ecological knowledge recorded in Sitka has been published in peer reviewed journals.<sup>2</sup> Those publications identified traditional Sitka Sound herring management practices that included habitat conservation (limiting disturbance of spawning areas) as well as the identification of protected embayment for habitat cultivation including placing hemlock boughs into the

<sup>1</sup> Thornton, Tom, et al, 2010 Herring Synthesis Documenting and Modeling Herring Spawning Area Within Socio-Ecological Systems over time in the Southeastern Gulf of Alaska NPRB Project 728.

<sup>2</sup> Thornton, T. F., and Kitka Sr., H. (2010). The Tlingit way of conservation: a matter of respect. In Walker Painemilla, K., Rylands, A. B., Woofter, A., and Hughes, C. (eds.), *Indigenous Peoples and Conservation: From Rights to Resource Management*. Conservation International, Arlington, pp. 211–218; Thornton, T.F., & Kitka, H. (2015). An Indigenous Model of a Contested Pacific Herring Fishery in Sitka, Alaska. *International Journal of Applied Geospatial Research (IJAGR)* 6(1): 94–117; Thornton, T. F. (2012) Watersheds and marinescapes: understanding and maintaining cultural diversity among Southeast Alaska Natives. In Johnston, B. R., Hiwasaki, L., Klaver, I. J., Castillo A. R., Strang V. (eds.), *Water, Cultural Diversity, and Global Environmental Change*, Springer, pp. 123–136;



substrate and transplantation of eggs and herring to new habitat settings to enhance local herring spawning areas.

A fundamental principle of traditional Tlingit marine resource management (that includes herring) has been identified by Langdon (2007:266) as “relational sustainability”<sup>3</sup>. This is the assertion that the principles of Tlingit sustainable resource management practices maintained over thousands of years are ground in a knowledge of the environment shaped in part by oral traditions identifying moral obligations of reciprocity and conservation. Tlingit oral traditions from Sitka recorded by Swanton (1909), specifically identify the importance of herring conservation in Sitka Sound, and repercussions of overharvesting.<sup>4</sup>

## **2. Historical Summary of Industrial Herring Management in Support of Herring Conservation**

It is critical the Board of Fisheries members, charged with making herring management decisions, critically examine historical failures in herring management by the State that have resulted in Sitka Sound being the last remaining viable subsistence and commercial herring population in Southeast Alaska. The “relative” abundance of Sitka Sound stock in contrast to reduced stocks in other parts of Southeast Alaska must be evaluated against the backdrop of historical management failures and in consideration of the ecological importance of herring to other critical marine subsistence and commercial resources, such as king and Coho salmon which are vital to the wild seafood economy in Sitka.

Industrial scale commercial harvesting of herring began in 1882 with the development of Killisnoo Reduction Plant in Chatham Strait on Admiralty Island.<sup>5</sup> Southeast Alaska herring bait fisheries began in 1910 to support the growing regional halibut fisheries. The quantity of herring harvested for reduction plants peaked in 1928. During much of this same period shore based industrial whaling was taking place in Chatham Strait, Cape Ommaney and southern Baranof Island. The ecosystem disruption caused by a reduction in the whale population can be attributed to supporting the abundance of Southeast Alaska herring in the early to mid-twentieth century (Thornton et al 2010:293). This conclusion is supported by other work in the North Pacific (Springer et al 2003).<sup>6</sup> A model developed Witteveen et al (2006)<sup>7</sup> indicates that historic whale harvests from waters around Kodiak released 10,000 tons of prey annually. This model suggests that the reduction of whales would have caused an ecosystem disruption contributing to early twentieth century herring abundance and the ability of herring stocks to partially recover in some areas after over exploitation for reduction plant fisheries.

Between 1932 and 1934 three successive recruitment failures led to collapse in Southeast Alaska herring population. In 1939 and again in 1942 all herring fisheries in Southeast Alaska were closed. The state of

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<sup>3</sup> Langdon, Stephen 2007, *Sustaining a Relationship: Inquiry into the Logic of Engagement with Salmon among the Southern Tlingit*. In *Native Americans and the Environment: Perspectives on the Ecological Indian*. Lincoln: University of Nebraska Press

<sup>4</sup> Swanton, John 1909, *Tlingit Myths* Smithsonian Institution Bureau of Ethnology Bulletin 39. Washington D.C.: Government Printing Office

<sup>5</sup> This historical review is based on Chapter V of Thornton et al *Herring Synthesis* (see footnote 1). This data was originally compiled by former ADF&G Biologist Fritz Funk. Additional citations provided as relevant.

<sup>6</sup> Springer, A.M., J.A. Estes. G.B. Van Vliet, T.M. Williams, D.F. Doake, M.D. Danner, K.A. Forney and B. Fister 2003. Sequential megafaunal collapse in the North Pacific Ocean: an ongoing legacy of industrial whaling? *PNAS* 100:1223-1228.

<sup>7</sup> Witteveen, B.H., R.J. Foy, and K.M. Wynne 2006. The effect of predation (current and historical) by humpback whales (*Megaptera novaeangliae*) on fish abundance near Kodiak Island, Alaska. *Fishery Bulletin* 104:10-20



Alaska began managing herring in 1959 and in 1972, after nearly a century of harvesting and multiple herring collapses ADF&G began surveys for development of sac roe herring fisheries. This summary historic timeline suggests the pre sac roe baseline herring population estimates that were the basis for the development of the sac-roe fishery were based on highly depleted herring stocks. Following the development of the sac roe fisheries in Southeast Alaska there have been multiple regional collapses in herring stocks.

- 1980 West Behm Canal herring fishery closes after one sac roe and three bait fisheries (Rauwolf 2006)<sup>8</sup>
- 1980 Auk Bay Lynn Canal herring collapse (Third largest S.E. Alaska herring biomass) (Rauwolf 2006)
- 1990 Kah Shakes sac roe fishery Collapses (Second largest S.E. Alaska biomass) (Rauwolf 2006)
- 1995 Kah Shakes biomass reduced from 20,000 ton biomass to 143 tons (Rauwolf 2006)
- 1998 Cat Island sac roe herring gillnet fishery exceeds quota by 11% (Rauwolf 2006)

These examples highlight some of the failures in herring management since the state began managing herring for a sac roe harvest. Today of the of the twenty plus commercial herring fisheries in Southeast Alaska identified in 2016 ADF&G regulations only Sitka Sound supports a viable subsistence and commercial herring fishery.<sup>9</sup>

To presume that continued management of herring in Sitka, along a downward shifting baseline does not invite the collapse of the last remaining viable commercial and subsistence herring fishery is to ignore the historic collapse of every southeast Alaska herring fishery. These data suggest management of these herring stocks should be highly conservative in order to help stabilize and rebuild herring stocks for both present user groups and future generations of Alaskan harvesters.

As further evidence of regional herring decline Local and Traditional Ecological Knowledge documentation published in 2010 and 2015 (See Footnote 1) identified that between 1915 to the present knowledgeable experts identified 2,759 miles of herring spawn areas. Yet from 1970-2007 ADFG identified only 1,118 miles of spawn. This research suggests that herring spawn areas now less than half of what had been identified prior to ADF&G management of herring for a sac-roe purse fishery (see footnote 1). Based on these historic data Thornton et al 2010 reached conclusion herring stocks in Sitka Sound are being managed in depleted state (See footnote 1).

### **3. Ecological Significance of Herring for other Marine Resources in Support of Herring Conservation**

Concurrently herring have a critical role as forage fish for other important commercial and subsistence resources that are vital to the seafood harvesting culture and way of life in Sitka. Research conducted by the Canadian Department of Ocean and Fisheries has identified the critical ecological niche of herring in the marine environment. Pacific herring are fed upon by a diversity of marine predators that include

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<sup>8</sup> Rauwolf, Andy, 2006 An expose on the history and controversy surrounding commercial herring management in Southeast Alaskan fisheries (excluding Sitka Sound). Electronic document, [http://www.sitnews.us/0106Viewpoints/011706\\_andy\\_rauwolf.html](http://www.sitnews.us/0106Viewpoints/011706_andy_rauwolf.html), accessed 8/20, 2007

<sup>9</sup> [http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/regulatory\\_herring\\_map.pdf](http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/regulatory_herring_map.pdf)



marine birds, mammals, fishes and invertebrates. Off the coast of Vancouver Island, adult herring comprise major proportions of the diet of the following species.<sup>1011</sup>

Chinook Salmon – 62%,  
Coho Salmon – 58%,  
Lingcod – 71%  
Harbor Seals – 32%

All three of these marine finfish are critical commercial and subsistence marine resources harvested in Sitka and seals are an important subsistence marine resource. Sitka is the largest commercial troll port in Alaska. The troll fisheries specifically target Chinook and Coho Salmon. Salmon originating in watersheds along the entire west coast of North America, outside of Alaska as well as salmon from Alaska watersheds feed on herring in the eastern Gulf of Alaska and are also targeted by Alaska commercial hand and power trollers out of Sitka and other Southeast Alaska communities. The commercial troll dinglebar fishery in Central Southeast Outside Waters (CSEO) reporting area targets lingcod and rock fish that rely upon Sitka Sound herring stocks. A collapse of local herring stocks would have devastating impacts on the viability of multiple components of the seafood harvesting economy of Sitka and other Southeast Alaska fishing communities. Management of herring for the benefit of the sac roe fishery must consider the critical ecological role of herring for the viability of other local commercial and subsistence fisheries.

Section 15 of Article VIII of the Alaska State Constitution identifies there is no exclusive right of a fishery guaranteeing there is no monopolistic right to a resource by one user group. Recognition of the critical role of herring to multiple user groups and the ecological function of herring for the viability are critical for sustaining Alaska fisheries.

#### **4. Comments on Individual Proposals**

Proposals 98 and 99 both seeks to reduce Sitka Sound commercial sac roe harvest levels as a herring conservation measure to ensure long term health of the Sitka Sound herring biomass and in support of subsistence harvests. These proposals do not seek to rescind the commercial sac-ro-e fishery. Rather by reducing the harvest percentage it seeks to ensure the long term viability of herring for all user groups and other marine resources that are critical to local commercial and subsistence fisheries. Proposals 98 and 99 are consistent with Section 4 of Article VIII of the Alaska Constitution which identifies resources are to be managed based on principle of sustained yield as well as with Alaska Statute AS16.05.258 identifying the resources must be managed to ensure subsistence harvests prior to allocating resources to other user groups.

On 11/29/2017 the Sitka ADF&G Advisory Committee reviewed herring proposals and unanimously voted in support of proposal 99 with amendment to modify the GHL for Sitka Sound in order to make it consistent with the formula used *in every other herring fishery in Southeast Alaska*. BOF members

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<sup>10</sup> [https://www.raincoast.org/projects/marine-birds/pacific\\_herring/](https://www.raincoast.org/projects/marine-birds/pacific_herring/)

<sup>11</sup> IPHC Technical Report 21 Halibut as Predator and Prey E.A. Best and Gilbert St. Pierre. This report also identifies the role of herring in the diet of Pacific Herring in the Gulf of Alaska. Halibut is a critical resource for both subsistence and commercial harvesting in Sitka.



should consider the strong level of community support across different user groups in support of herring conservation measures in Sitka and **adopt** proposal 99 in support of herring conservation.

Proposal 94 Submitted by Southeast Alaska Herring Alliance submitted in support of the Sac Roe Purse seine permit holders seeks to reduce the Amount Necessary for Subsistence (ANS). In 2002 the BOF made determination that the ANS for herring eggs in Sitka Sound was 105,000 to 158,000 lbs. In 2009 the BOF made an upward revision to the ANS based on the mean estimated harvest between the years 2002-2008. The revised ANS was set at 136,000-227,000 lbs. Proposal 94 **is not** consistent with recent BOF recognition of upward shifting trend in harvests to meet the herring egg ANS in Sitka Sound. Rather by seeking to lower the ANS threshold proposal 94 seeks to expand harvest opportunities for the commercial sac roe seine fishery at the expense of subsistence harvesters.

Based on ADF&G statistical data the overall subsistence harvest of marine fish in Alaskan waters is .9%, while the commercial harvest makes up 98.5 of marine fish harvested in Alaska waters.<sup>12</sup> Given the scope of this discrepancy further limiting subsistence harvests to benefit the commercial sac roe harvest group is not consistent with Section 15 of Article VIII of the Alaska State Constitution identifying there is no exclusive or monopolistic right to a fishery by one user group. Proposal 94 reduces resource harvest opportunities for local residents and is also oppositional to wide ranging conservation concerns voiced by Sitka residents and the recommendation of the Sitka Advisory Council to manage herring stocks conservatively. I therefore strongly encourage the BOF to **NOT** adopt proposal 94

Proposal 104 also submitted by the Southeast Alaska Herring Alliance Proposal seeks to repeal the 2012 BOF action setting aside part of historic and traditionally used harvest area identified through ADF&G Subsistence research.<sup>13</sup> This proposal would expand the geographic areas where commercial seining is permitted to pre 2012 areas. The area set aside for subsistence harvesting in 2012 was a small subset of the areas that have been identified as historical and traditionally used subsistence herring egg harvest by the ADF&G Subsistence Division (See footnote 13). This proposal reduces harvest opportunities for subsistence harvesters in Sitka Sound by placing them in more direct competition with commercial harvesters and I encourage the BOF members to **NOT** adopt proposal 104.

Over past harvest cycles The ANS (Amount needed for Subsistence) for herring eggs has not been met in Sitka Sound which is the **ONLY** viable subsistence and commercial fishery in Southeast Alaska of the 20 plus Southeast Alaska herring fisheries identified in 2016 ADF&G commercial herring regulations (see footnote 9). The small areas closed to commercial herring fishing in Sitka Sound is only a subset of the traditional primary subsistence harvest area used by Tlingit and non-Native subsistence harvesters and does not impact the overall viability of the herring seine fishery(See footnote 13).

ADF&G herring management models have also failed to accurately predict the harvestable quantity of herring in recent harvest cycles. Current models do not account for fluctuations in ocean conditions or predation impacting herring survival. Based on these complex and interrelated factors reducing the area for exclusive herring harvest is un Alaskan and violates Alaska statute **AS 16.05.258. SUBSISTENCE USE AND ALLOCATION** mandating subsistence needs must be met prior to consideration of opening fishery to other encourage the BOF members to **NOT** adopt proposal 104.

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<sup>12</sup> [http://www.adfg.alaska.gov/static/home/subsistence/pdfs/subsistence\\_update\\_2014.pdf](http://www.adfg.alaska.gov/static/home/subsistence/pdfs/subsistence_update_2014.pdf)

<sup>13</sup> <http://www.adfg.alaska.gov/techpap/TP%20343.pdf>





Proposal 105 proposed by the Sitka Tribe of Alaska seeks to expand the area closed for commercial harvesting consistent with ADF&G Subsistence Division Technical Report 343 identifying areas traditionally and historically used for harvesting herring spawn in order to help ensure community needs for herring spawn are met. This proposal does not seek to close the commercial sac-roe seine fishery but to expand areas set aside exclusively for subsistence harvesting.

ADF&G Subsistence Division Technical Report 428 “The Subsistence Harvest of Pacific Herring Spawn in Sitka Sound” has identified fluctuations in the number of households participating in harvesting spawn. This data must be looked at through the appropriate analytical lens in order to avoid non-accurate correlations about household participation and annual harvests.

Based on decades of data collection ADFG Division of Subsistence has long looked at household participation in subsistence harvesting through what the division identifies as the “30-70” Rule.<sup>14</sup> This is the understanding that 30% of households in a community are typically responsible for 70% of community harvest in terms of useable pounds. This is especially significant in times of low resource abundance. When there is high level of resource availability with easy access more households will directly participate in harvest activities. When there is resource scarcity or difficulty in harvesting more households will depend on expert harvesters (the 30%) to supply them with subsistence resources. Thus recent lower levels of recorded household participation is NOT evidence of decline in level of effort, resulting in ANS not being met. This data identifies that the level of effort to obtain spawn is increasing. This is consistent with data recorded by the Sitka Tribe Resource Protection, Traditional Food Program which suggests that among households participating in subsistence the level of effort has actually increased. The table below indicates that over past two year period alone the number of sets of hemlock boughs being made has more than doubled while the actual amount of herring spawn harvested has fallen dramatically.<sup>15</sup>

Year	Sets (#)	Harvest (pounds)
c. 2002-2015	approx. 15	approx. 4,000-5,000
2015	21	9,600
2016	31	3,600
2017	33	1,260

Proposal No 105 seeks to broaden the subsistence harvest area to include those areas identified in ADF&G Subsistence Technical Report 343 into the existing area reserved for subsistence herring harvesting. The areas included in the proposed expanded subsistence zone includes important road access areas such as around Halibut Point and nearby marine access areas around Middle and Big and the Gavinski Islands. This proposal coupled with conservation measures Identified in proposals 98 and 99 seeks to provide subsistence harvesters greater opportunity to harvest and result in additional conservation of herring while continuing to support a Commercial Sac Roe seine fishery in Sitka Sound.

Therefore it is my recommendation that the BOF **ADOPT** Proposal 105.

<sup>14</sup> [https://www.adfg.alaska.gov/static/home/library/pdfs/subsistence/subsistence\\_2011.pdf](https://www.adfg.alaska.gov/static/home/library/pdfs/subsistence/subsistence_2011.pdf)

<sup>15</sup> Unpublished Data recorded by Sitka Tribe Resource Protection Program, Pers Comm, Kyle Rosendale Sitka Tribe Fisheries Biologist 12/19/2017





Proposal No 106 seeks to create additional conservation areas for purpose of conserving and rebuilding herring stocks in Sitka Sound, and should be viewed in conjunction with Proposal 105. This proposal seeks to restrict commercial herring in parts of Aleutkina Bay and Nakwasina Sound and Katlian Bay. Proposal 106 is based on conservation practices identified in Traditional Ecological Knowledge (TEK) research with Tlingit elders from Sitka and published in peer reviewed journals (see footnote 2). Tlingit TEK identified the areas identified in proposal 106 as important rearing areas for young herring. These are also areas where both historically and within living memory Sitka Tlingit people created herring spawn habitat by placing hemlock boughs into the substrate and where herring spawn has been moved to in-order to create spawn in new habitat areas. This proposal therefore seeks to enhance herring abundance throughout Sitka Sound for the benefit of all user groups through limiting on access into critical habitat areas for young herring that are not in a reproductive age class and are not targeted by commercial harvesters. These areas have also historically been used for subsistence harvests (See footnote 1). This proposal dovetails with other proposals 98, 99, and 105 which seek to reduce commercial herring harvest for purpose of long term herring conservation and expand current areas identified for subsistence harvest based on Traditional Ecological Knowledge.

Proposal 106, in conjunction with Proposal 105, are designed to support Sitka subsistence harvest and more broadly the conservation of herring as a keystone that are a critical resource for other marine resources (see footnote 10) None of these proposals seek to end commercial sac roe seine fishing in Sitka Sound.

What these proposals DO seek to accomplish is a measured reduction harvest commercial harvest levels and to expand the area identified for subsistence harvesting in order to promote herring conservation for the benefit of all user groups consistent with the sustained yield mandate identified in Section 4 of Article VIII of the Alaska State Constitution. Therefore I encourage the BOF to **adopt** Proposal 106

#### **5. Summary Defense for Sitka Sound Herring Conservation**

The congruence of archeology and TEK identify deep historic use and sustainable management of herring by human populations (See section 1). Concurrently the comparatively brief history of State management of herring has contributed to overall decline in herring abundance throughout Southeast and the collapse of every other Southeast Alaska herring fishery (See Section 2). I ask the Board of Fisheries members to take a long view on herring management in Southeast Alaska and adopt proposals in support of long term herring conservation and subsistence harvest opportunities in Sitka Sound for benefit of all Alaskans

People have harvested herring in Southeast Alaska and Sitka Sound for over 9,000 years. Herring are critical for multiple other commercial fisheries based in Sitka such as the commercial trolling fleet which is vital to the local seafood economy and way of life in Sitka and throughout Southeast Alaska. Herring conservation measures ultimately serve to benefit all user groups including the long-term viability of the sac-roie seine fishery. A precipitous decline in herring based on failure to correctly evaluate the health of the Sitka Sound herring within its historic and ecological context as the last viable subsistence and commercial herring stock in Southeast Alaska could result in Sitka becoming yet one more of the "historic" Southeast Alaska herring fisheries. This would have devastating impacts on the local subsistence and commercial seafood harvesting economy, culture and way of life in Sitka.



Therefore as fellow Alaskans I strongly urge all BOF members to read and listen to all of the passionate comments submitted to the BOF in support of herring conservation and recognize the vital cultural and economic importance of herring to all local fisheries beyond Sac Roe Seine fishery. Management of Sitka Sound herring for a sustained yield must consider their ecosystem contributions for other commercial and subsistence resources beyond the sac-ro-e seine fishery. Therefore I encourage you to **adopt** proposals 98, 99, 105, 106 in support of conservation and subsistence harvesting. None of these proposals seek to close down the herring sac roe seine fishery in Sitka Sound

I also encourage the BOF to **NOT** adopt proposals 94, 104, 107 that would reduce the ANS for herring and reduce areas reserved for subsistence harvesting and place subsistence harvest in conflict with another gear type during periods of shortage. Adoption of these proposals have the potential to significant and potentially devastating and irreversible impact on herring and other fisheries dependent upon health Sitka Sound herring stocks.

Thank you for taking the time to consider these comments in support of long term and sustainable herring management and thank you for your service on behalf of all Alaskans.



Submitted By  
Josh Wisniewski  
Submitted On  
12/28/2017 1:20:12 PM  
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To the Alaska Board of Fisheries Members:

My name is Josh Wisniewski. I live in Sitka Alaska. I am a commercial hand troller. I rely on trolling for an important portion of my income. Commercial salmon trolling is critical to the seafood harvesting economy in Sitka. Salmon trolling is also critical to the diversity of Alaska as a unique cultural way of life with deep regional history.

My comments here are in support of proposals that have the potential to enhance and provide access and opportunity for troll fishermen.

Commercial trolling is critical to the economy of Southeast Alaska. According to the Alaska Trollers Association (ATA) 85 percent of troll permit owners live in Southeast Alaska and 1 in 40 residents of Southeast Alaska participate in commercial salmon trolling.<sup>[1]</sup>

The Southeast Alaska troll fleet has a long history of contribution to sustainable management and enhancement of Alaska's salmon resources. As a hook and line fishery trolling providing the highest quality salmon for fresh seafood markets. Commercial salmon trolling is one of Alaska's most low impact and sustainable commercial fisheries, with a history in southeast Alaska that predates the use of gas powered engines on boat that began in the early twentieth century.

As a commercial troller I am in support of the following proposals:

**136; 139; 149; 150; 151; 173; 174; 176; 177; 180; 183; 184 and 186**

I encourage the BOF to **adopt** these proposals in support of Southeast Alaska trolling families.

As a commercial troller I am **opposed** to the following proposals:

**37, 123, 132; 133, 134 144; 146; 148; 169; 170; 178; 179; 181; 182; 185**

Comments in support of individual proposals

**Proposal 173** is in support of chum trolling in Districts 12 and 14 This proposal seeks to remove the sunset provision, as follows: Delete [(e) The provisions of this section do not apply after December 31, 2017.] This is an economically important chum troll fishery. Concurrently maintaining it results in Chinook conservation as it spreads out the troll fleet with more trollers targeting chum this results in less gear targeting Chinook salmon. I encourage the BOF to **adopt** proposal 173.

**Proposal 177** would allow for salmon trolling for Coho salmon to take place in certain during salmon conservation closures. The purpose of this proposal is to assist the commercial trollers to meet the allocation of hatchery produced Coho salmon.

In 1994, the BOF formed a task force composed of seine, gillnet, and troll representatives to develop an allocation plan for enhanced salmon. This Task Force recommended, and the Board approved, a troll allocation of 27-32% of the total value of the commercial catch of enhanced salmon.

The troll fleet has consistently fallen short of its allocated share of enhanced salmon for 22 consecutive years and since 2005, the actual troll share has averaged just 16-19%. This proposal would seek to provide more opportunities for trollers to harvest the troll allocation of hatchery produced salmon as per the established allocation scheme.

I highly encourage the BOF members to **adopt** proposal 177 in support of Southeast Alaska salmon trolling families.

**Proposal 183** was submitted by the Yakutat Area Fish and Game Advisory Committee in response to changes in the mouth of the Situk River, and the need to adjust trolling boundaries in relation to the movement of the river mouth.

The Situk River mouth has shifted west approximately 2 miles. The Yakutat Advisory Committee submitted a proposal to move the no trolling corridor in place around the mouth of the Situk estuary Westward Approximately 2 miles to account for the river's migration. During the last BOF cycle the location of the troll boundary was not changed in conjunction with changes in the river mouth. This proposal seeks to address that discrepancy. I encourage the BOF to **adopt** Proposal 183.



The following comments are in response to Draft Chinook Management Plans for the Unuk, Chilkat and King Salmon River Systems. As a fisherman and an Alaska who appreciates the privilege of harvesting wild fish I am supportive of conservation and habitat protection to ensure the health and viability of our wild salmon resource

Commercial Trolling for Chinook salmon is one of Alaska's oldest commercial fisheries. It is a fishery that developed prior to the use of internal combustion engines. Multiple small rural Southeast Alaska communities developed as trolling communities in the early twentieth century. Today trolling is a low impact artisan fishery that make an important regional economic contribution. More broadly than the economic contribution of salmon trolling to Southeast Alaska communities trolling is a unique cultural way of being whose contribution to the diversity of Alaska cannot be measured. Proposed changes in the management of Chinook management must consider the potential impacts on the socio-economic and cultural value of the troll fishery.

Concurrently trollers have unique knowledge of salmon and many fishers have multi-generational knowledge of changes in salmon abundance and behavior that can contribute significantly to the conservation and sustainable management of Chinook salmon for present and future generations. Future changes in Chinook management for the purposes of conservation should seek to draw upon troller knowledge.

The Chilkat, Unuk and King Salmon Draft Management Plans were released on December 22nd and provide an incredibly limited window for review and comment prior to the close of 2017 Board of Fisheries Comments on December 28. This places an unrealistic burden on trollers (the user group impacted by proposed ADF&G changes) to evaluate data and provide informed and meaningful responses.

These draft management plans consist of multiple options that include restrictions on commercial salmon trolling, to protect Chilkat and Unuk River Chinook. On 12/27/2017 the ADF&G Sitka Advisory Council proposed changes to the ADF&G Draft Management Plans, which were submitted to the Board of Fisheries. As a commercial troll permit owner I am in support of the changes to the draft management plans proposed by the Sitka Advisory Council. The changes proposed by the Sitka Advisory Council (based on publically available data) propose surgical adjustments in commercial troll management, in order to protect salmon migrating to the Chilkat and Unuk River while also seeking to minimize the socio-economic impacts to the Sitka troll fleet, which is the largest troll port in Alaska.

The changes in the drafty management plan proposed by the Sitka Advisory Council seek to avoid the imposition of arbitrary restrictions on commercial trolling in areas, and during periods of time where Chinook bound for these river systems do not appear to be harvested in statistically significant quantities. Concurrently the changes to the draft management plans proposed by the Sitka Advisory Council **do** seek to restrict some commercial troll harvesting during times and in areas where Chinook bound for the Unuk and Chilkat are encountered for purpose of supporting conservation and the rebuilding of Chinook stocks for the benefit of all Alaskans.

*Sitka Advisory Committee proposed adjustments to the Chilkat King Salmon Rivers King Salmon Management Plan to include the following:*

Option B, Specific Action To Implement the Objective: on page 20 &21 of the Chilkat and King Salmon Rivers Stock Status and Action Plan 2018.

2. Troll Fisheries: Combination of time and area changes and closures.

Winter Troll: notwithstanding any remaining seasonal guideline harvest level [CLOSE THE WINTER TROLL FISHERY IN ALL WATERS OF SEAK/YAKUTAT BEGINNING SW 12, WITH] Section 15-A in Lynn Canal/Chilkat Inlet north of the latitude of Sherman Rock remaining closed to commercial trolling through December 31.

Spring Troll: limit opportunities during May and June spring troll king salmon fisheries to [TERMINAL HARVEST AREAS, WATERS IN CLOSE PROXIMITY TO HATCHERY FACILITIES OR RELEASE SITES; AND] areas and times that have not been identified as having relatively high proportional harvests of wild stock Chilkat [SEAK/YAKUTAT] king salmon; spring troll chum fisheries, as described in the District 12 and District 14 Enhanced Chum Salmon Troll Fisheries Management Plan (5 AAC 20.114) to open June [15] 11 with the retention of king salmon prohibited.

Summer Troll: [DELAY THE FIRST RETENTION PERIOD FOR KING SALMON DURING THE GENERAL SUMMER TROLL FISHERY BY A WEEK]. Open on July 1 to target 70% of the remaining troll king salmon annual allocation minus the number of treaty king salmon harvested in winter and spring troll. [ON JULY 8.] Remaining 30% to be harvested in August!

Troll Benefits: These amendments provide great socioeconomic benefits to the troll fishery, do not disrupt the traditional July 1 opening of the summer troll fishery with retention of king salmon, preserve chum troll opportunity beginning on June 11 as negotiated for a section of District 12, with minimal impact on Chilkat king salmon. See attached sheet.

Troll Detriments: The proposed ADF&G plan will eliminate an average of 3020 troll kings in district 113-95 and 114 worth over \$300,000 to save on average of 92 Chilkat king salmon in the spring troll fisheries.

The winter troll closure, while having some benefits in late April for Unuk king salmon does not benefit Chilkat king salmon.

The summer troll opening delay will cause huge disruptions to the troll fishery to save no more than 10 Chilkat kings a year.

*Sitka Advisory Committee proposed adjustments to the Unuk River King Salmon Management Plan to include the following:*



#### Winter Troll:

Notwithstanding any remaining seasonal guideline harvest level the winter troll fishery will close in all waters of [SOUTHEAST ALASKA/YAKUTAT ON MARCH 15] District 13 on April 15.

Spring Troll: Opportunities during May and June spring troll king salmon fisheries will be limited to [THAS, WATERS IN CLOSE PROXIMITY TO HATCHERY FACILITIES OR RELEASE SITES;] areas and times that have not been identified as having relatively high proportional harvests of wild stock UNUK [SEAK/YAKUTAT] king salmon; spring troll chum fisheries, as described in the District 12 and District 14 Enhanced Chum Salmon Troll Fisheries Management Plan (5 AAC 20.114) to open June [15] 11 with the retention of king salmon prohibited.

Summer Troll: [DELAY THE FIRST RETENTION PERIOD FOR KING SALMON DURING THE GENERAL SUMMER TROLL FISHERY BY A WEEK]. Open on July 1 to target 70% of the remaining troll king salmon annual allocation minus the number of treaty king salmon harvested in winter and spring troll. [ON JULY 8.] Remaining 30% to be harvested in August!

Troll Benefits: These amendments provide great socioeconomic benefits to the troll fishery, do not disrupt the traditional July 1 opening of the summer troll fishery with retention of king salmon, preserve chum troll opportunity beginning on June 11 as negotiated for a section of District 12, with minimal impact on Unuk king salmon. See attached sheet.

The winter troll closure benefits Unuk king salmon in 113 after SW 16.

Troll Detriments: The summer troll opening delay will cause huge disruptions to the troll fishery to save few Unuk River spawning king salmon and could be better served by use of time and area king salmon non-retention after July 1.

There is a significant and immediate need for the Board of Fisheries to direct ADF&G to critically examine the ecological factors contributing to the current down cycle in King Salmon abundance including climate change and marine survival and to work in partnership with the commercial troll fleet in the development of actions in support of promoting and maintaining healthy and viable Chinook populations in Southeast Alaska watersheds for the benefit of all Alaskans.

Thank you for taking the time to read these comments and for your service on the Board of Fisheries for all Alaskans.

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[1] [http://www.aktrollers.org/what\\_is.html](http://www.aktrollers.org/what_is.html)



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December 28<sup>th</sup>, 2017

Alaska Board of Fisheries  
John Jensen, Chair  
Via email [dfq.bof.comments@alaska.gov](mailto:dfq.bof.comments@alaska.gov)

**RE: 2018 SOUTHEAST FINFISH, BOARD OF FISHERIES HERRING PROPOSALS**

Chairman Jensen and members of the Board of Fisheries,

Thank you for the opportunity to comment on herring proposals during the Southeast cycle. I am writing to provide comments on the following:

**Support for proposals 94 and 104**

**Oppose proposals 95, 96, 98, 99, 100, 105 & 106**

**Oppose proposal 107 *at this time***

I am a fourth generation fisherman and Petersburg resident, and I began fishing when I was 14 years old. I currently fish in Southeast Alaska for halibut (as a quota share holder), sablefish, salmon seine, and herring seine. I started participating as a crewmember in the Sitka sac roe herring fishery in 2006, and 2016 was my first year participating as a permit holder in that fishery. This meeting will be my third Board of Fisheries (BOF) cycle.

As a herring sac roe permit holder, my fishing income is fully dependent on the ability of the Alaska Department of Fish and Game (ADF&G) to manage harvest opportunity based on sustainability and available biomass. Sitka herring is one of the most studied fisheries managed by the State of Alaska. It is imperative that ADF&G is given the management flexibility to effectively conduct a sustainable fishery to ensure that fishermen have adequate access to the resource but more importantly, that the resource is available for the coming years.

**General Comments Regarding Herring & Fisheries Management in Alaska:**

Fisheries management should not support efforts to close fishing area based on appearance instead of science. It is also important to note that closing herring fishing area will not force herring to spawn in that area. ADF&G has decades of information on herring spawn area and deposition that indicates herring will spawn where they want, not where we want them to.

Additionally, fisheries management should also not allow the use of subsistence proposals as a tool to unnecessarily restrict management ability and commercial harvest. ADF&G has a strong history of managing the Sitka herring fishery for the natural fluctuations that occur with fisheries resources. As such, there is enough herring for all in Sitka. It is important to acknowledge that although the need for subsistence herring has remained relatively stable, participation in the subsistence fishery has declined resulting in tension amongst user groups that is not related to commercial harvest.





As stated in ADF&G comments for proposal 104, many factors impact subsistence harvest. "These factors include natural variability in spawn distribution and timing, weather patterns, and the number of individuals attempting to harvest for subsistence purposes. Since much of the subsistence effort is currently focused in specific areas, natural changes in spawn distribution would also be expected to affect harvesting success."

Permit holders, crewmembers, tendermen, processors, and pilots come from all over the state to participate in the Sitka herring fishery. The economics of this pulse fishery reverberate throughout Sitka, the region, and Alaska. **Given the unpredictability of herring spawn timing and the short duration of open fishing periods, the fleet needs as much stability as the BOF can provide.**

*I plan to attend the BOF Southeast finfish meeting and will be available to serve on the herring committee if the Board feels that my input would provide value.*

**Comments on the Southeast Board of Fisheries Cycle Timing:**

In addition to the herring comments provided, I would also like to take this opportunity to request that the BOF solicit input and consider moving the meeting timing for the Southeast cycle. January and February are times where fishermen in Southeast are prepping for the upcoming crab fisheries. The majority of Southeast fishermen are multi-gear, multi-species harvesters which means that even if they are able to make the crab portion of the meeting, they are missing out on critical salmon, herring, and groundfish discussions at the BOF. Southeast fisheries keep the fleet busy from the end of January to the end of October. *I would request that the BOF consider moving the Southeast cycle to December when minimal fisheries are occurring.*

**PROPOSAL COMMENTS:**

**Proposal 94, SUPPORT- Reduce the amount of herring spawn reasonably necessary for subsistence in Sitka Sound.**

Subsistence harvest of herring eggs is an important part of the fabric of Southeast and I strongly believe in reasonable opportunity for subsistence harvest. I oppose efforts to use a decline in subsistence *effort* to justify restraints to management of the commercial fishery. Additionally, I strongly support working to gather data on all harvest methods (herring and roe) in order to protect the sustainability of Alaska's fishing resources. I agree with ADF&G that ANS findings should be made using the best available data.

**Proposals 95 & 96, OPPOSE- Repeal the commercial sac roe herring fishery in Sections 15-B and 15-C. Repeal the commercial sac roe herring fishery in Section 11-A.**

ADF&G needs to retain the management flexibility to execute sustainable fisheries. There is no science based rationale to support these proposals that request areas be closed to commercial harvest. Closing an area to commercial harvest will not increase participation in subsistence herring roe harvest, which is the primary reason that subsistence harvest is in question. The justification for supporting this proposal would be based on perception as opposed to reality.

**Proposals 98, 99 & 100, OPPOSE- Reduce harvest rate for commercial herring fisheries in the Southeastern Alaska Area. Reduce maximum harvest rate used to establish the commercial sac roe herring fishery guideline harvest level in Sections 13-A and 13-B from 20% of the spawning biomass to 10% of the spawning biomass. Amend formula**



**used to calculate guideline harvest levels for the commercial herring sac roe fishery in Sections 11-A, 15-B, and 15-C.**

ADF&G has decades of experience and a proven track record for sustainably managing herring. Alaska, Sitka in particular, is the gold standard on the West Coast for herring management. Please allow ADF&G to continue to manage our successful fisheries. As with all species, there are natural spikes and dips in herring biomass. This is part of the cyclical nature of natural renewable resources. There is enough herring for everyone without continually trying to undermine the reputation of our management.

**Proposal 104, SUPPORT- Repeal closed waters in the District 13 commercial herring fishery.**

The closure of the core area was designed to restrain commercial harvest and restrict ADF&G management ability. Additionally, having an area closed to commercial harvest does not guarantee that herring will spawn in that area.

Despite recommendations made by Office of Subsistence Management biologists and the State of Alaska, the Federal Subsistence Board shut down federal waters around Makhnati Island in 2015. The action by the FSB has resulted in federal overreach that took away the ability of the State of Alaska to manage fisheries within their jurisdiction. Therefore it is unnecessary to maintain the closed waters enacted by the BOF.

**Proposals 105 & 106, OPPOSE- Expand closed waters in the District 13 commercial herring fishery. Expand closed waters in the District 13 commercial herring fishery.**

Please do not support efforts to close fishing area based on appearance instead of science. It is also important to note that closing a herring fishing area will not force herring to spawn in that area. ADF&G has decades of information on herring spawn area and deposition that indicates herring will spawn where they want, not where we want them to.

**Proposal 107, OPPOSE AT THIS TIME- Management plan for herring spawn on kelp in pounds fisheries in Sections 3-B, 12-A, and 13-C, and District 7. Establish a herring spawn on kelp commercial fishery in Sections 13-A and 13-B.**

Although I understand the logic behind the intent of this proposal, I don't believe that the fleet or processors are ready to see the Sitka sac roe fishery transition to a roe on kelp fishery without a lot of discussion on what that would look like. *I am interested in listening to the discussion surrounding this issue and possibly revising my position based on additional information.*

Thank you for your time and your attention to the fisheries of Southeast Alaska. Please feel free to reach out if you need any clarity or have questions.

Sincerely,

Julianne Curry





**Justin Peeler**

F/V Defiant  
4120 Halibut Point Road  
Sitka, Alaska 99835  
(907) 340-6106  
[justinpeeler79@gmail.com](mailto:justinpeeler79@gmail.com)

December 27, 2017

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526

RE: Comments on herring proposals for SE Shellfish Meeting Jan. 11-14, 2018

Dear Chairman Jensen and Board of Fish Members,

As a second generation Fishermen from Petersburg Alaska I have been involved in the salmon, herring, and crab fisheries in Southeast Alaska all my life. As well as many other net, pot, and hook fisheries on the West Coast and Gulf of Alaska. I currently own and operate the F/V Defiant out of Petersburg, Alaska and reside in Sitka, Alaska.

I am writing to express my;

**Opposition to Proposal 73**

As a current Tanner Crab permit holder, I oppose turning this fishery in to a equal quota share fishery. I believe that equal quota share fisheries make it harder for new entrants to get in to the fishery. At this time, the tanner stock is strong in SE and I see no biological concern to change the fishery.

**Support for Proposal 72**

I see no harm in having exploratory areas in SE for Tanner Crab. Due to season length, we do not get time to explore these areas for harvestable crab; possibly leaving economic opportunity in the water.

**Support for Proposal 93**

As the writer of this proposal I support it and its intention to harvest Market Squid in the State waters of Alaska. The growing population of squid in Alaska left untouched as a harvestable resource could be devastating to other resources; as they are aggressive feeders and have a very short life cycle. As an economic opportunity, this resource is going untouched.



I would like to thank you for your service to the State of Alaska. I will be at the meetings and look forward to meeting and working with each of you.

Sincerely,

Justin Peeler



**Justin Peeler**

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[justinpeeler79@gmail.com](mailto:justinpeeler79@gmail.com)

December 27, 2017

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526

RE: Comments on salmon proposals for SE Finfish Meeting Jan. 15-23, 2018

Dear Chairman Jensen and Board of Fish Members,

As a second generation Fishermen from Petersburg Alaska I have been involved in the salmon, herring, and crab fisheries in Southeast Alaska all my life. As well as many other net, pot, and hook fisheries on the West Coast and Gulf of Alaska. I currently own and operate the F/V Defiant out of Petersburg, Alaska and reside in Sitka, Alaska.

I currently serve my gear group(seine) as a officer on the board of directors for Southeast Alaska Seiners Association(SEAS). I am also a seine representative on the board of directors for Norther Southeast Regional Aquaculture Association(NSRAA). I am writing to you on behalf of myself and my comments below are my opinion.

**For proposal 142** I would like you to read through this proposal carefully and I would like to point out that this is an attempt to get the seine fleet in to their allocated range, of enhanced fish. It is written in a way to get us in our range and not over our range, like the gillnetters currently sit. We are only asking for what is ours and this proposal is written in away that proves that.

For all other Salmon proposals, I would like you to refer to written comments presented to you by SEAS.

Thank you for your service to the State of Alaska. I will be attending the meeting and look forward to meeting and working with each of you.

Sincerely,

Justin Peeler



**Justin Peeler**

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[justinpeeler79@gmail.com](mailto:justinpeeler79@gmail.com)

December 27, 2017

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526

RE: Comments on herring proposals for SE Finfish Meeting Jan. 15-23, 2018

Dear Chairman Jensen and Board of Fish Members,

As a second generation Fishermen from Petersburg Alaska I have been involved in the salmon, herring, and crab fisheries in Southeast Alaska all my life. As well as many other net, pot, and hook fisheries on the West Coast and Gulf of Alaska. I currently own and operate the F/V Defiant out of Petersburg, Alaska and reside in Sitka, Alaska.

I am writing to express my:

**Opposition** to proposals 95, 96, 97, 98, 99, 100, 101, 102, 103, 105, and 106  
**Support** for proposals 94 and 104

**Oppose Proposals 95 and 96** -Close herring fishing in 15-B 15-C and 11-A

Closing these areas to commercial herring fishing is not necessary, as the ADF&G manage these stocks and has kept it closed due, to not meeting minimum thresholds. When and if these stocks meet threshold there could be a managed fishery resulting in economic opportunity for the area.

**Oppose Proposal 97** - change Food and Bait opening to December 1<sup>st</sup>

As a Food and Bait herring fishermen; I ask you to oppose this proposal asking to change the opening date for the fishery. It would greatly affect my market. The bait caught in this fishery gets shipped all around the state of Alaska and some to the West Coast. Providing the freshest bait possible to fishermen involved in Fisheries starting in December and January. Changing the start date would not allow me to fill those markets.



This is also a allocative proposal and the writer of this proposal is trying to curtail the catch of the Food and Bait fishery and also paint the fishery as wasteful and destructive to the resource so the unused portion of the harvest limit can be rolled into ROK fishery in the spring.

**Oppose Proposals 98, 99 and 100 – Harvest rate**

These proposals want to change the management of herring stocks in SE Alaska. Overtime the Sitka Sac Roe fishery has proven itself to be well managed by the ADF&G. Both sustaining the herring stock for all users and providing a strong commercial harvest. I believe the strong history of ADF&G to manage this stock on sound science does not call for any change in management of herring stocks.

**Oppose Proposals 101, 102 and 103 – section 3b allocation**

These proposals aim to reduce the Food and Bait fishery harvest percentage and increase the ROK's. As a Food and Bait fishermen I oppose this allocative grab. I believe these proposals are greed driven and are coming after action taken by the ADF&G to manage the ROK fishery in a way to sustain and protect the resource in 2016.

The ROK fishery was started due to a opportunity to use the unused Food and Bait harvest. At the conception of the fishery a unused portion of the Food and Bait harvest limit was allocated to the ROK fishery. At this time there is no unused/unmarketable harvest limit.

The herring caught in this fishery are used around the State of Alaska and West Coast. It provides countless Alaskan Fishermen opportunity by providing a fresh quality bait to be used in the pot, and hook fisheries. This is a Alaskan resource being harvested by Alaskans to be used to create economic opportunity around the State.

As a Food and bait fisherman I can also testify to the great working relationship we the fishermen in the food and bait fishery have with the department. Not only do we have log books in this fishery used to keep track of sets made and observations, we email and call the biologists on a trip by trip bases. All this is done to insure a well managed and sustainable fishery.

**Oppose Proposals 105, and 106 – Expand closed waters in Sitka Sound.**

These proposals aim to close more waters in Sitka Sound to commercial herring fishing. This is Sitka Tribe of Alaska using substance as a way to eventually shut down the commercial fishery. Using substance as a reason with such a flawed accounting of actual substance use or need is no way to manage Alaska's resources. There is just no scientific justification for this action and would result in a huge economic impact on the region.



**Support Proposal 94 – Change ANS**

There is one flaw in the management of the Sitka Sound Herring stock. It is the management of the substance users. The amounts reasonably necessary for substance (ANS) is wrong. It is a piece of data used to try and curtail the commercial fishery. We manage our fisheries based on best science available. The ANS is not and needs work. I ask you to support the Southeast Herring Conservation Alliance in finding the most accurate ANS; so that we can do away with this flaw in management.

**Support Proposal 104 – closed waters in District 13**

I am asking you to support proposal 104. I do not believe closing waters to commercial fishing is necessary for substance users to be able to meet substance needs. As shown by information presented by Southeast Herring Conservation Alliance; by having this area closed to commercial fishing of herring, it could greatly impact the ADF&G ability to manage the herring fishery for maximum sustainable yield.

In closing I would like to thank you for your time and service to the State of Alaska. I will be attending the meeting and look forward to meeting and working with each of you.

Sincerely,

Justin Peeler



Submitted By  
ken davis  
Submitted On  
12/14/2017 4:53:49 PM  
Affiliation  
thinget an  
  
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Email  
[chandler@sitkawild.org](mailto:chandler@sitkawild.org)  
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100 johnson st  
Sitka, Alaska 99835

Dear board of fish, i feel like the herring are being very over fished. i've observed in my life here in sitka, less and less herring spawn in the local area. i used to be able to pick up herring eggs off the beach. i would like to see herring here for my children and grandchildren to enjoy for there life. I did grow up with great enjoyment colecting herring eggs. I also feel that it is very unfair the there is herring fishermen on the board of fish! i would like to see herring fishery to stop or at least slowed way down.



**From:** Ken Larson  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** BOF Bottom Fish Release Tool Proposal  
**Date:** Friday, December 15, 2017 1:23:42 PM

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Gentlemen:

With regard to this proposal for Prince William Sound, I support the requirement. Many of us Halibut Charter Boat operators in PWS voluntarily started using this tool that was invented by Ace Calloway around 2010. It has worked well for us. The only concerns that I have is that this required tool use apply equally to ALL COMFish and Sport Fisherman as well. Please be specific on whether the tool has to be on board even if bottom fish are not targeted. Thanks,

Capt Ken Larson  
Sanity Charters  
PO Box 445  
Valdez, AK 99686  
907-251-7522





**From:**  
**To:**  
**Subject:** FW: Stocks of Concern Plan  
**Date:** Friday, December 29, 2017 8:36:25 AM

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**From:** Monique Wilkinson  
**Sent:** Thursday, December 28, 2017 4:26 PM  
**To:**  
**Subject:** Stocks of Concern Plan

To the Board of Fisheries:

We have a family run business of three, husband, wife and 12 year old son. We troll for salmon and king salmon is 40% of our annual income. Conservation of a resource used by many individuals should not be the burden of one gear group. If conservation is really the issue, then no fish should be caught by anyone. Let everyone who uses the resource share the impact of conservation together equally.

Concerned fishing family,

Ken, Monique & Ardel Wilkinson



Submitted By  
Kenneth Gross  
Submitted On  
12/27/2017 5:29:59 PM  
Affiliation  
NEVER MONDAY CHARTERS

Phone  
907-612-0458  
Email  
[famcaptken@gmail.com](mailto:famcaptken@gmail.com)

Address  
P.O. Box 873, Haines, Alaska 99827 (Winter)  
P.O. 906 (Summer)  
Skagway, Alaska 99840

My name is Ken Gross. I own NEVER MONDAY CHARTERS in Skagway. I'm writing about the Fish & Game's proposal to the Board of Fish about not letting anyone fish for King Salmon until July 15th in area 15A. The area I'm concerned with is Taiya Inlet North of Taiya Point. I'm hoping you can help with the decision the Department of Fish & Game is about to make. First I would like to give you some information on my Southeast, Alaska experience so hopefully feel like you know me a little when you read my letter.

I have lived in Haines since 1974 and have fished for King Salmon for almost all 44 years.

I have owned 3 commercial fishing boats. I gillnetted for Salmon, long-lined for Halibut, Sablefish, and Grey Cod, Dove for Abalone, Sea-cumbers and Sea Urchins and Crabbed in all over Southeast, Alaska.

More recently I have owned two charter boats. I was hired as a fishing guide in Elfin Cove for about 5 years. I still take personal trips out there almost every spring to fish. I have also guided in Juneau, Haines and now have my charter business in Skagway. I'm only trying to give you enough information on me so I can hopefully have some influence.

I have a lot to say but before I bore you with all the other less important information I'll touch on what is important now.

There are now only 3 boats fishing presently Charter fishing out of Skagway. I think there are only 3 Charter boats in Haines also. After the no retention rule for King Salmon happened last year the Charter boats ended up being the only boats fishing for Kings. Normally we would have some boats from Whitehorse down fishing during the summer but not when they can't keep the fish. I did see some Canada boats later in the summer but they all ran South to fish for Halibut.

The only fish we have to target is here is King Salmon. The water is too deep for Halibut. We do have a few Pink Salmon show up every other year but even on a good year it's very short lived. We mostly are taking our passengers on a scenic fishing trip. We do catch a few Kings but very few for all the time out there.

I had never participated in catch and release with King Salmon before and I didn't think my customers would like it but I was wrong. They really enjoyed letting the big fish go and watching them swim off.

I have used barbless hooks or hooks I have crimped the barbs down on for the last 4 summers. If the fish I release is in the water it has much less of a chance of bleeding. My mortality rate is very low and has been since I have gone barbless. Most of the other fishermen up here have followed suit. I have been in the Fish & Game Office in Haines several times in the past three years asking Rich the Sport Fish biologist to implement barbless hooks. He said they have talked about it, but nothing has happened. I know this would have a large impact on the survival rate of our Kings. It would even be a good idea for the Commercial Trollers also. The small Kings they release are very fragile and their gills rip easily. If you rip a barbed hook out of those small Kings is almost a sure thing they will start to bleed. I think they should make a barbless hooks mandatory. Hawaii has started to require barbless hooks in some of their fisheries.

They have put in 190,000 small King Salmon up here in Skagway costing thousands and thousands of dollars for them to be raised. This is the last year they are going to show up. After over 20 years of having a hatchery run they have decided not to do it any longer. They are saying it's because of low returns. The real reason is because the fish ladder is high and dry for most of the tide. When the fish can't get up the ladder the seals have learned to hang out and slaughter the King Salmon. They don't even eat them they just kill them for fun like cats with a mouse. These are the last years the fishermen here have, unless we can figure something else out.

From being a gillnetter I know about the Want and Waste law here in Alaska. It's against the law to take the eggs out of a Chum Salmon and throw the worthless carcass overboard. With all those Kings coming back here to Skagway with no place to spawn and not letting anyone to catch them, isn't that a waste of the resource?

Rich told me we had been catching up to 20% Chilkat Kings in the Skagway fishery. The Chilkat River is over 40 miles away. We do some times during the summer go south of what we call High Water Falls or Long Falls when fishing is slow near Skagway. The Falls is about half way to Haines from Skagway. No one from the Fish & Game ever has come out there to take scale samples but I would venture to say that is where most of the Chilkat Kings have been caught in the past. If you closed South of High Water Falls I think our chances of catching any Chilkat Kings we would be releasing anyway would be decreased. The fish we catch South of the falls are usually fatter and have their adipose fins.



PC089  
2 of 4

The money I make stays here in the State with both my crew and myself. I made a living last summer trying my hardest not to kill any King Salmon and so did the two other boats that fished out of Skagway. Why would you want to put us out of business when we're not killing Kings and the commercial fishermen are Killing them on purpose and making less money doing it.

If we use barbless hooks and release all the Kings, the chances of us killing a Chilkat King is very small. We certainly shouldn't be put out of business if we're willing to release all the fish and not even take them out of the water.

All of the charter boats up here in Skagway and Haines are Alaskan Residents. If you don't let us fish, all of our businesses will fail. Just myself after being reassured by Rich for the last two months that the worst that should happen is the same as last year, no retention of Kings which we can work with. I would ask him everytime I would run into him to see if anything had changed. In the mean time I continued to take 50% deposits on trips I was booking for the summer. At this point I have close to 20 bookings. I can return all the deposits but I don't get the credit card fees back of close to 4%. This year in order to get my guide license I had to renew my Insurance for the summer close to \$3000. I won't have money to pay my moorage so I can potentially lose my boat that is worth almost as much as a house. I have a college student showing up in April believing she has a job to help with her college expenses. I could even lose my house. It's really scary because I have no control. It's all up to you folks and I'm not the only one that is in this position.

When they start commercially trolling for Coho's, Chum and Pinks they will be allowed to catch and release Kings so they can make a living. Why not us?

This is a really scary letter for me to write since I have so much on the line. I don't want to get anyone upset, but I feel I should let you know what I have observed over the last 43 years I have been on the water up here.

I should let you know about the increase in Sea Lions in upper Lynn Canal. There are at least 4 or 5 times more Sea Lions than in the eighties and early nineties when I Gillnetted in Lynn Canal. I believe it's because of the hatchery Chum Salmon they are dumping in Lynn Canal. The problem is that the Chums are the third run of salmon to show up. The Sea lions are having lot of babies because they are fat and happy during the Chum run, but they are really hungry when the first run of fish goes by, which happen to be the Kings. I don't know if the early run of Sockeye is still low but I think the Sea lions could be affecting that run also.

I see the Trollers fishing Soapstone and Cross Sound when I go out there in the spring. I believe it is interception fishery. I heard they were only allowed 2 days instead of three. I have seen the board in Brian's office here in Haines, of where Chilkat Kings are caught and a bunch are at Soapstone and the so called hatchery openings. Why let Trollers make a living by killing the Kings and not let us fish and let them go??

When I Guided out there in the late nineties and in 2000, the Troll fishery was closed from April until July 1st. When we would charter fish for Kings before the 1st of July the King fishing was really good. After July 1st when they opened it up for trolling we didn't catch another King for the rest of the summer. That's an example of how efficient the Trollers are.

Now it's open a few days a week non-stop. The fish hold up in the coves there on falling tides sometimes for days waiting for the building tides to give them a free ride to the inside waters. When they open it up even for a few days a week the fish that are hanging out waiting for their free ride get scooped up. I know they say they're catching hatchery Kings but that's not the only Kings being caught.

There are a lot of small streams farther inside passed where the Trollers are allowed to fish. Some of the streams where I used fish had some really large Kings go up and spawn. Most of those streams are now dead because they had very small runs. It doesn't take very many fish to totally wipe out those runs when they're not getting passed the fishermen in the spring.

I would like to suggest moving the place where they release the hatchery Kings further inside so they are not intercepted and make it into the inside waters to spawn.

I was the Port Captain for Glacier Bay for several years, and fished in the bay when I had time off. Glacier Bay had those small King streams also, but I don't think they have fish showing up any more, I believe those runs have been intercepted also.

They also didn't let Seiners fish Home Shore in Ice Strait years ago because it's where the salmon mill. When I worked as an A. B. / Helmsman on the State Ferries for 3yrs I would see the Seiners give mostly Sockeye and some King Salmon they had caught at Home Shore to the people of Hoonah so they wouldn't get closed down. We had pickup trucks headed back to Juneau with coolers filled with Sockeye getting on the ferry.

You may want to consider looking at how they managed some of the fisheries in the past. Things don't seem to be headed the right way now. I don't know if it will work, but it might be worth considering. I don't think ever opening up Home Shore is for Seining is a good idea.

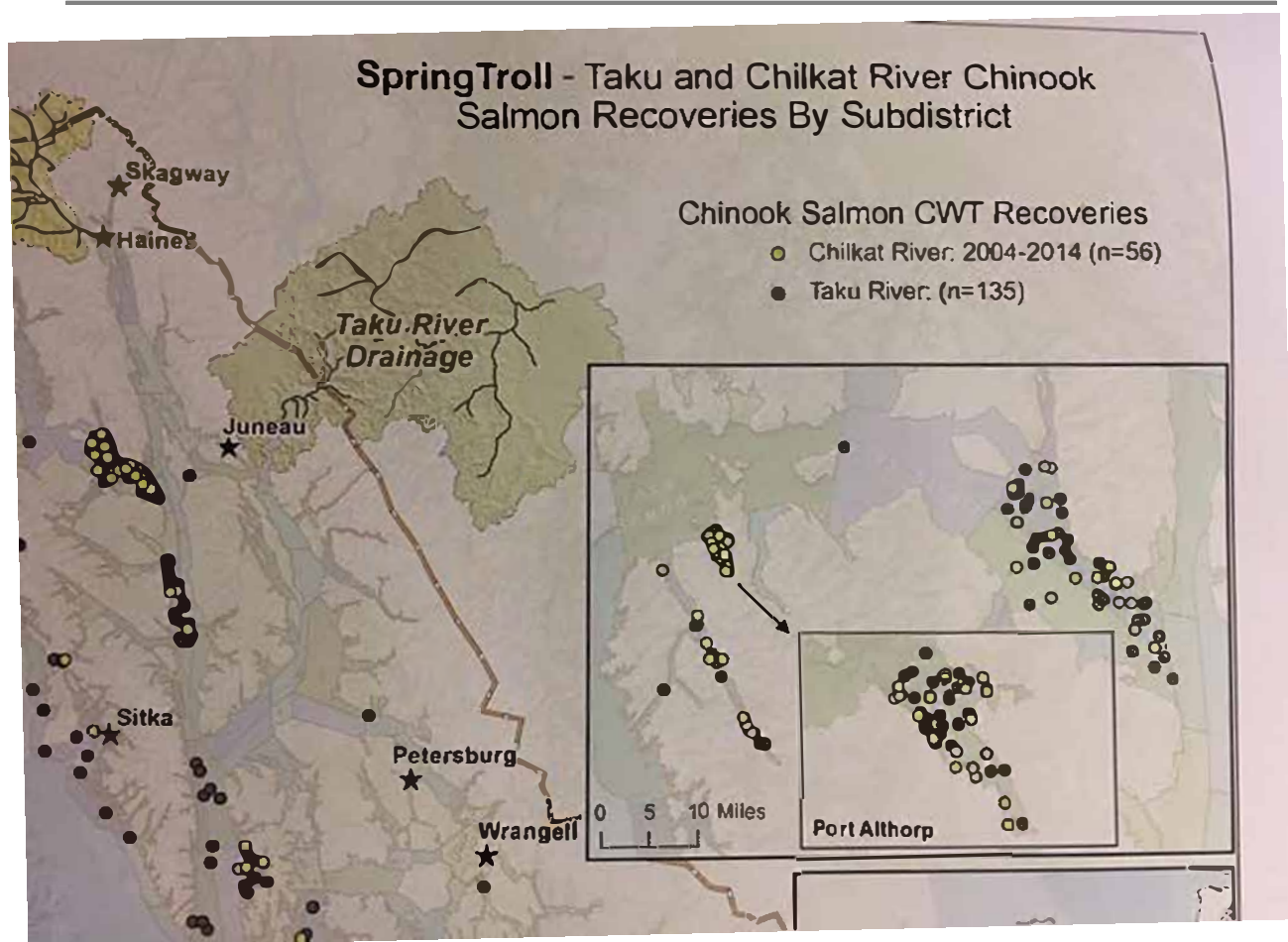
I'm not trying to tell the Fish & Game how to should do their jobs. I just think everyone who is fishing should be sending the Fish & Game what they know or have observed out there in the water because they can't be everywhere and we all want the same thing. This is not intended to criticize anyone I'm hoping I can help save the King Salmon run.

This is my livelihood, along with others; this is how we make a living in Southeast Alaska. I hope you can help them reconsider the closure or at least find a solution that could benefit everyone involved.

Thank you for your time.



**From:** Kenneth Gross  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** What is happening to the Chilkat King Salmon!  
**Date:** Thursday, December 28, 2017 3:58:28 PM  
**Attachments:** [PastedGraphic-2.tiff](#)



They are still opening this interception area and slaughtering the Chilkat and Taku King Salmon under the pretense of hatchery openings.. They have to KILL the Kings to make any money. When charter fisherman Catch and release especially with barbless hooks and still feed their families. The fish can still go up and spawn.. It does't make sense to ruin their lives when their not hurting the runs. Thanks for listening..



My name is Kenyatta Bradley I submitted proposal 60, this is my first time participating in this regulatory process I did my best to keep it simple and concise.

My desire is to share my knowledge of the resources in the local Sitka Sound area in an ecologically friendly way. My Plan is to take tourists in local bays close to town to check pre baited and preset crab pots for viewing and educational purposes only.

I have recently purchased a 75 S.E. Dungeness crab pot permit, and with recent fluctuations in crab stocks I am looking to diversify my economic abilities.

Through research of the Guided Sport Eco. Tourism Dungeness Crab Fishery in George Inlet near Ketchikan as well as feedback from local fish and wild life enforcement I understand the need to have a clear separation between this fishery and commercial fishing as well as sport/subsistence fishing.

Therefore I propose amending proposal 60 to not include the commercial register and deregister stipulation. Without this stipulation the proposal should be the exact same as the fishery that has been going on for 2 years plus in Ketchikan.

Feel free to contact me by any means necessary with any questions or comments as I may not be in Sitka until January 15<sup>th</sup>.

Kenyatta Lee Bradley  
907-738-0218  
p.o. box 2  
Sitka A.K. 99835  
bradleyatta@gmail.com



## Comment on Action Plan for Chilkat and King Salmon Rivers

From: Juneau Charter Boat Association

The JCBOA supports option A in district 11.

Please place this in the Public Comments for this issue.

Thank you.

Best Fishes!

Capt. Kevin

Lost in Alaska Adventures, LLC

[www.lostinalaskaadventures.com](http://www.lostinalaskaadventures.com)

907-321-1405

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Submitted By  
Lakota Harden  
Submitted On  
12/28/2017 2:06:39 PM  
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Address  
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Sitka, Alaska 99835

To the members of the Board of Fisheries,

Growing up in Sitka, Alaska, as a daughter of a Tlingit man, subsistence eating was our way of life. My father, a master fisherman and hunter, worked hard at a weekly 9-5, and spent most weekends fishing and hunting. He kept our freezers full of everything from the sea. We, as children were fishing regularly too. As seasonal harvesters, the ocean provided so much to us and our way of life was based around these times of fishing.

Herring season was always so plentiful, as we spotted the milky water and everyone moved into action for the spawn. Herring was so plentiful, as children, we fished with several hooks to lift them out of the water, 4 and 5 at a time. This was magical, when you are a child. Elders would come with their buckets and take them home for food. The water was alive and moving with so many herring. Everywhere we looked, there were Eagles in the trees, on the shore, and flying overhead. I counted 160 Eagles at one time around us, hunting for herring.

The herring egg harvest was the best, with families joining together to harvest the branches. All these activities were communal with everyone helping each other. As I grew older and the herring became scarce in other areas in the southeast, we worked together to provide our people on other islands with some of our traditional herring eggs, shipping freezer boxes out to elders in those communities.

In 2017, this has drastically changed. We are grieving the loss of herring population, with sightings of whales diving, with their skin peeling, because they are starving. All of life in the Southeast depends on herring for their source of food, from the fish, the bear, eagles, and so many others.

It is our responsibility to protect this important sea life. The dollars that are taking precedence over the herring and salmon populations is a travesty. Yes, we need to make a living but not at the expense of depleting the ocean of the fish. We do not want to be the generation that has forgotten the seasons of the ocean.

Then there is the matter of LAW which stands for Subsistence fishing for the Indigenous Population. It is the law to protect the rights of people who've taken care of this land and waters for centuries.

The Alaska National Interest Lands Conservation Act of 1980 is being violated all around.

The data concerning the herring are NOT showing the actual growth, the sizes, is misrepresenting the actual impact of the losses of the life span of the herring, the salmon.

According to the Alaska Dept. of Fish and Game:

Alaska Department of Fish and Game (ADF&G) studies show that rural subsistence accounts for only 4% of the total fish and wildlife harvest, while 95% goes to commercial interests and 1% to sport users.

**Please support Proposal 99, and cap the sac-roe fishery at 10% biomass. These species in the ocean cannot speak for themselves. We must protect them.**

Our lives are depending on your decisions you make. Please think of your future generations!

For our future,

Lakota Harden

Grandmother and concerned island citizen





Submitted By  
Larry Demmert  
Submitted On  
12/8/2017 7:26:05 AM  
Affiliation  
Permit holder

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206-941-9442  
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[Alaskapremium@frontier.com](mailto:Alaskapremium@frontier.com)  
Address  
306 9th st  
Craig, Alaska 99921

I support proposal 107 allowing for ponding in Sitka sound on remaining ghl by Nse spawn on kelp permit holders .

I support proposal 108 to expand spawn on kelp area in 3b. The department has done this more than once and if the area were larger it would spread out the fisheries, most of the other area is to open to put net pens any where else but by the Alberto's/clam island area and the St Phillips areas. The department also expands and gives the bait fishery early openings , the bait fishery is a 100% mortality fishery and ponding actually increases the fishery by allowing for more spawning surface(nets).

I am vehemently opposed to proposal 110 by the department as their methods of determining biomass are constantly under forecasting the herring population in the area. Last year they forecasted 7800 tons for the fishery and they ended up with over 20 miles of spawn and a current year forecast of 16,000 tons which is more than double what they expected back last year.

I am also opposed to proposal 112



Submitted By  
Lee Gilpin  
Submitted On  
12/28/2017 1:40:09 PM  
Affiliation

As a 150 pot Dungeness crab permit holder I can not support proposal 54. It seems irresponsible to give away any percentage of pots, especially without a mechanism to get them back in the future already put in place.

I do support proposal 235 on slow crab years the crab fleet moves on to other fisheries. Allowing economics to direct the pressure on the crab fishery seems better than the system in place now that is outdated.



Submitted By  
Lee House  
Submitted On  
12/14/2017 11:09:28 PM  
Affiliation

Dear Board of Fish,

I am writing in support of Proposal 99 to reduce the sac-roë guideline harvest to 10% of biomass. Herring are a critical forage fish that are better left in the water to support our marine ecosystems, salmon fisheries, and subsistence roë harvests. I strongly support proposal 99 because it would increase the amount of mature herring left in the water where they belong.

Sincerely,

Lee House



Submitted By  
Leland Frankman  
Submitted On  
12/26/2017 11:04:18 AM  
Affiliation  
fly fishing

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2395960582

Email  
[flyfishinglawyer@comcast.net](mailto:flyfishinglawyer@comcast.net)

Address  
6938 Rain Lily Ct.  
#103  
Naples, Florida 34109

Sirs, I oppose Proposal 165 currently before you. I am 77 years old and have been fly fishing the Tsiu river since my early 50's almost every September, first in tents and now at the Alaska Wilderness lodge. The Tsiu is one of the premier silver fishing rivers in the world and the several lodges that use it have protected the river and the fish. We kill some fish but rarely take our limit, so most fish are released. The financial benefit to Alaska from fishing there is great. With all the netting opportunities available in Alaska one wonders why netting in the river is permitted at all. I have been wading in the river with my wife when the young commercial fisherman have purposely come so close to us to almost hit us. This is a dangerous situation so that the two uses should be kept separate. The proposal leaving just 1/4 mile of fishable area commercial free is unhistoric and unacceptable.



Proposal 56

Closed Waters in Registration area A

Lewis Hiatt

Box 92

Mile 25 Hollis

Craig, Alaska 99921

[lewishiatt@yahoo.com](mailto:lewishiatt@yahoo.com)

I support Proposal 56, the area selected for closure is in close proximity to the community of Hollis and the village of Kasaan. Both areas have boat ramps and harbors which are utilized by all residents of Prince of Wales Island. This area has seen a huge increase in personal use crab fisherman from the western side of Prince of Wales due to a larger charter fleet and increase in sea otter numbers. The commercial Dungeness crab fleet would not be impacted by this small increase to the closed fishing area and will allow a sustainable biomass to be harvested by personal use fisherman from all of Prince of Wales.



Proposal 84

Closed Waters in Registration Area A

Lewis Hiatt

BOX 92

Mile 25 Hollis

Craig, AK 99921

[lewishiatt@yahoo.com](mailto:lewishiatt@yahoo.com)

I support the proposal and have participated in the personal use shrimp fishery as a resident of Hollis for 30 years. Shrimp numbers/catch rates began to decline in 2012 and are now at such low numbers commercial seasons have been closed by emergency order since 2015.

The protected waters of Twelve-Mile Arm and Kasaan Bay have become popular with personal use residents from Craig, Klawock, Hydaburg, as well as Hollis and Kasaan. I ask that these waters remain closed to commercial shrimping indefinitely allowing stocks to rebound so residents may again harvest shrimp for their family's needs. This area comprises such a small portion of District 2 that the impact on commercial users is negligible. Commercial vessels would still be able to fish District 2 in waters not directly adjacent to the communities of Hollis and Kasaan.



Submitted By  
Lexi Fish  
Submitted On  
12/28/2017 12:00:46 PM  
Affiliation  
Resident of Sitka

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9077385684  
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Address  
228 Lakeview Drive  
Sitka, Alaska 99835

Dear Board of Fish,

I am a lifelong Sitka resident, mother of two small children, and am involved in multiple commercial fisheries in Southeast Alaska.

I am writing in support of Proposal 99 to reduce the sac roe guideline harvest to 10% of biomass. Herring are a crucial forage fish; the more left in the water the better, in order to support our current and future marine ecosystems and subsistence roe harvests. I strongly support Proposal 99 because it would increase the amount of mature herring left in the water, where they belong.

Treating herring as a forage fish and reducing commercial catch is in the best interest of our community and surrounding region - our current and future ecosystems and the future of our communities, culture, traditions and fisheries industries rely on healthy fish populations - conservation of herring is critical to that important mission.

Thank you very much for your time,

Lexi Fish Hackett

Sitka, Alaska



Submitted By  
Lisa Honer  
Submitted On  
12/28/2017 4:47:26 AM  
Affiliation  
Tsiu

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47669 County Highway 14  
New York Mills, Minnesota 56567

RE: Tsiu River Proposal 165

To Whom It May Concern:

I am writing to express my extreme opposition to Proposal 165. Sportsman fishing is a backbone of the Alaskan culture and brings significant economic benefits to the area. Sportsmen are drawn by the taste of wilderness, to experience the untamed natural beauty and for the world class fishing. While I understand the purpose of commercial harvesting; you must at the same time, maintain the integrity of the Alaskan experience and safeguard a healthy salmon population. I have been a yearly visitor to the Tsiu River for the past 3 years. I have seen first hand the perils to nature and disregard to the sportsmen's experience from commercial harvesting; even with the 1/2 mile reservation for the sportman fishing. It is my firm belief that any further impingement on the sportsman's fishing will not only violate the integrity of the experience but also potentially jeopardize the health of the salmon population. The closed area to commercial fishermen should remain at a minimum of 1/2 mile.

Thank you for your consideration,

Lisa Honer





Submitted By  
Lisa Sadleir-Hart  
Submitted On  
12/28/2017 9:54:51 PM  
Affiliation

As a long time Sitkan, I want to express support for reducing the herring fishery quota for 2018. Herring are a key indicator of a healthy eco-system and declining numbers in Sitka Sound point to a faltering, at-risk environment. The amount available for harvest needs to be drastically reduced and the spawn carefully monitored. Without herring, a host of other species will also falter from salmon to whales. It's time for us all to work to protect God's sacred creation and reduce the herring quota for 2018.



Submitted By  
Louise Brady  
Submitted On  
12/27/2017 10:17:22 AM  
Affiliation

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Sitka, Alaska 99835

Yaayeetaawdulgein yoo xat duwasaakw. Kiks.adi aya xat. Kaxatjaa Shaa naa xat sitee. My Tlingit name is Yaayeetaawdulgein. I am Kiks.adi from what is now known as Sitka. We Kiks.adi are known as the Herring Ladies. We have 2 "histories" that tell of our special relationship to the Herring. One is about a woman who would call the herring to her in the spring time. It is said the first place the herring would spawn in all Southeast Alaska was at the Herring Rock that was located where the Totem Square Inn now sits. This story shows the understanding we Tlingit have of the herring and its importance to the ecosystem of Southeast Alaska. The second story is that of greed. Of the woman who harvest herring and refuses to share with even her own family. We also have a treasured Chilkat Robe with the Herring Rock design on it and one of our clan houses uses the Herring Rock design and is known as the Herring Rock House. All of this shows our spiritual connection to the herring.

Futhermore, the Board of Fish is invited to join us Kiks.adi in a celebration of the herring-Yaaw Koo.eex'-on Janauary 14, 2018 where we will celebrate the spiritual connection to the herring with our songs, dances, and stories.

Those of us who grew up anticipating the arrival of the herring and of eating fresh herring eggs off the hemlock branches is that our precious herring and their eggs are being exploited to the point where we can no longer share the communal experience of harvesting and storing our herring eggs. I have many fond memories of sitting around my mother Isabella Brady's kitchen table with my sisters, eating fresh out of the water herring eggs and cutting the branches and storing the eggs for family dinners, our Tlingit ceremonies, or for community Thanksgiving and Christmas dinners. Also, of being able to ship a box of fresh herring eggs to our friends in Barrow, who, in return, would send us muktuk for community dinners.

People have referred to herring eggs as a delicacy...they are not a delicacy...they are a staple food for our way of life of sharing with each other. It never occurred to me until the last few years, that if the ADF& does not start managing the herring roe fisheries in such a way that allows for a plentiful herring egg harvest...this precious food will be gone to us. It is unthinkable that I will not be able to share this food with my grandchildren. I never took photos of all the times we sat around the table bagging our eggs...or all the times we had herring eggs on the plate for our traditional ceremonies...or the look of pure joy as my granddaughters enjoyed the first taste of herring eggs in the spring. But if the management continues down the current path, all we will have left is photos of "how we used to get herring eggs."

It has been 20 years now that the Sitka Tribe of Alaska has been warning of dangerously low herring stock levels. As it stands now, Sitka has the only viable herring stock in Southeast Alaska with Auke Bay, Kashakes; Seymore Canal, Hobart Bay, and Tenakee all being fished out. In the case of Auke Bay, the ADF& finally shut down fishing there in 1982. The first "significant spawn" finally returned in 2014. Sheet'ka Tlingit do not want the same thing to happen here. It is more and more difficult for us to get the eggs on hemlock branches. The gatherers I have spoken with all say that they go and lay out their branches and go back to check only to have very thin eggs or none. There is no longer the ability to share with elders and family.

My brother, Ralph Brady, who was the primary subsistence gatherer for our family for years, recalls my mother, Isabella Brady, sending him to Sealing Cove in the 60's with a bucket to go get fresh herring. He remembers saying to my mother, "But I don't have line or a hook.". My mother's response, "It's okay. Just lower the bucket on the rope into the cove and bring it up." When he did that, it was full of herring.

My brother Ralph also tells of times when he didn't even have to go out on a boat to lay hemlock branches. He says he would just set them on Japonski Island.

Chuck Miller of Sitka, "Last year was so bad. We laid our branches and what we got was bad. Really thin."

Ed Young of Sitka, "There are so many places we used to lay our branches; Halibut Point Road, Sam Sing Cove, Alutkena, Deep Inlet, Sandy Cove, across from Camp Coogan.

I hope and pray you would make all future decisions. That if our tables and freezers continue to be void of herring eggs, it is not just losing a food source...but a treasured way of life. It is difficult to explain to someone who has not had this experience of the communal table what this means. As I said previously, I wish I would had thought more deeply and recorded the importance of these times and experiences. We Tlingit have so little left of what was our home and our experience on these lands and waters...please assure we keep this wonderful taste and experience.

## **United Nations Declaration on the Rights of Indigenous Peoples**

*To continue to allow this wasteful fishery would be in violation of:*



*Article 20 1. Which states: Indigenous peoples have the right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities*

*2. Indigenous peoples deprived of their means of subsistence and development are entitled to just and fair redress.*

Article 25 Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.

*Article 26 1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired. 2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired. 3. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.*



Submitted By  
Maia Mares  
Submitted On  
12/14/2017 3:16:14 PM  
Affiliation

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PO Box 6297  
Sitka, Alaska 99835

I support Proposal 99, which would leave more herring for traditional users and the whole ecosystem. I think we need to be much more conservative in our herring management. These fish are much more valuable left in the ocean than removed for sac roe. Our local communities depend on herring eggs for important subsistence and cultural values. Herring are a forage fish, and therefore crucial for the health of our ecosystem, which supports salmon and other larger fisheries we depend on. We need to take care of our herring, and that means more conservative management. I think we must take historical and traditional knowledge into account and listen to Alaska Native elders who are telling us that the herring are in trouble. This is why I support Proposal 99.



Submitted By  
Marian Allen  
Submitted On  
12/26/2017 12:05:57 PM  
Affiliation  
Ms.  
  
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829 Pherson Street  
Sitka, Alaska 99835

**I am writing in support of Proposals 98 and 99, proposals that would revise the Sitka sac roe fishery management to be more conservative.**

I lived on Kasiana Island for 16 years, from 1980 – 1996. In the early 1980s I remember collecting herring in the salt chuck that faces north on our island with my daughter. We simply picked them up at low tide and dropped them in a bucket. I do not collect a lot of eggs for personal use, but I do enjoy eating them while they are on the beaches. Our beaches and intertidal zone would be inches thick with eggs. People now are surprised to hear that.

I have listened to a number of people over the years who have different interests and perspectives on the sac roe fishery because eating herring eggs in the spring is important to me. I am sympathetic to the economic importance of the commercial fishery to Sitka, to the permit holders and to subsistence needs. A balance needs to be made between the monetary economic needs and the constitutionally guaranteed needs of subsistence gatherers. However, my greatest concern is environmental. Herring feed all our major fish. If the herring disappear or even are significantly diminished in numbers, our salmon, halibut and black cod will suffer and our commercial fisheries will suffer dire consequences.

From ADF&G I learned that the models that are used to arrive at harvest levels have no way of factoring in environmental conditions such as ocean acidification or warming water. We know that the ecosystem is changing in dramatic and unpredictable ways so managing the fishery conservatively only makes sense. All user groups need herring: subsistence users, sac roe permit holders, Sitka's economy, salmon, halibut, black cod, and all the other life forms that depend upon them.

These are the reasons I urge you to support proposals 98 and 99. Conservative management of Sitka's sac roe fishery is essential and must abide by the constitutional guarantee that adequate herring is available for subsistence use.



Submitted By  
Marie Graham  
Submitted On  
12/16/2017 8:57:27 AM  
Affiliation  
pilots partner

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9074412410

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5403 North Star ST.  
Anchorage, Alaska 99518

I am writing to oppose Prop. 159. Here are a few reason why the proposal should not even be up for conversation. All pilots are aware of the laws such as fishing in closed waters . [REDACTED] . All fisherman have the option of hiring a pilot if the fisherman decides not to hire a pilot he does not turn around and request a proposal to stop all other fisherman from using pilots. The pilots about 6 of them know the rules and have never broken laws they also have families they feed and take care of . This is a business and fish and game should not listen to the fisherman who have decided not to use an airplane [REDACTED] . I still believe this is a competitive fishery every fisherman has a right to run his operation as he or she sees fit . Thank you for your consideration. Please perserve one of the most unique jobs in Alaska the fish spotter. Thanks



Submitted By  
Marta Martinsen  
Submitted On  
12/16/2017 8:45:51 PM  
Affiliation

For the last 42 years my husband and I have lived in SE Alaska. My husband started a commercial fisheries business in 1976 and retired in 2010 leaving our sons to continue fishing. We have seen the Juneau herring fisheries close and in 40+ years it has not been reopened. We have seen a decline of the herring balls on the depth finder. There is an increase of sperm whales and sea lions taking advantage of fisherman's catches and smaller King Salmon size. I think this is all due to the lack of a food source.

People who have lived in Sitka since the 1950's and 1960's talk about how there used to be so many herring that you could "walk" across the backs of herring. Or they would scoop buckets of herring from the bay. There were no hooks involved, only buckets.

Herring is the bottom of the food chain. Herring feeds small fish, large fish, ducks, sea birds, Eagles, sea mammals including whales and people. 1993 an estimated 8000 murrelets died of starvation in Northern Alaska. This year thousands of California Sea Lions were unable to feed their pups who starved. The 10 year average spawn in Sitka Sound went from 61.4 nautical miles and last year there was 54.3 miles of spawn. Commercial Herring fisheries may not be sustainable at the present rate.

I would like a statewide moratorium on the Herring Fisheries, but that may not be a realistic option. So I am proposing the Sitka Tribes proposal number 99 that reduces the Sitka Sound 20% take to 10%. Our oceans are struggling with acidity, warming waters, radioactivity and we need to assist these animals by not depleting their food source.

Please seriously consider reducing the Sitka Sound Herring Fisheries from 20% to 10%.



Submitted By  
Martha Sharp  
Submitted On  
12/28/2017 10:24:50 PM  
Affiliation

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907-530-7006

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Address  
PO Box 60  
Craig, Alaska 99921

To: Board of fisheries concerning Southeast shellfish  
From: Martha Sharp  
Concerning: Proposal 84

Please close all of Kasaan Bay and 12 mile arm waters in district 2 to commercial pot shrimp fishing.  
I have been a resident of Hollis since 1979 and have enjoyed subsistence shrimp fishing in 12 mile arm. Since about 2010 the shrimp began not being as available as in years past. In the last three years, the harvest has been very poor with almost no shrimp to subsistence harvest.

Thank you for your consideration,

Martha Sharp





mail.com

Hello, I'd like to show support for proposal 84. I am a Hollis resident. My wife and I have used 12 mile arm as a food source for many years and would appreciate it if the shrimp levels were not depleted.

Thank You, Matt Beer



## **Comments on Some regulation changes proposed to the Board of Fish (BOF)**

**From: Matthew Donohoe, Po. Box 3114, Sitka, AK. 99835**

**To: Chairman of the BOF and BOF Members**

Below are comments on some of the 2018 BOF proposals. I will try to keep this short in the hope that among the mountain of material before you my comments will be accessible.

### **Proposal 123: OPPOSE.**

This proposal has been before this Board before. It seeks to increase the size of retained lingcod in the commercial fishery to equal that of the sport fishery. I assume it is based on a misdirected fairness ideal. The 30" limit in the sport harvest is not biologically based. The department set this limit to keep sport harvesters from exceeding the allocation (which is in pounds). To increase the size limit in the commercial catch may actually damage the resource because the larger lingcod are females and it would force commercials to target females.

### **Proposal 134: OPPOSE.**

Territorial Sportsmen (TS) in arguing for this proposal says, "...it is imperative that we take every possible conservation measure to assure that every spawning king salmon reaching our coast makes it to the rivers." So closing commercial fishermen in all of Districts 9, 12, and 14 when the Juneau area is closed but not closing those areas to Territorial Sportsmen at the same time is taking, "every possible conservation measure"? It's interesting that, in the name of conservation, TS considers themselves beyond the conservation actions they recommend.

The Board of Fish should reject this proposal and not agree to tie ADFG's hands by preempting the Department's options concerning conservation.



### **Proposal 178: OPPOSE.**

Seeks to move the Sitka Sound winter troll line in approximately 10 miles on the Kruzof Island shore when winter catch reaches 30,000 kings by March 1. The proposer argues “It is unfair to the rest of the Southeast communities to suffer the winter troll season closing so early due to extreme high harvest rates occurring in the Sitka winter fishery.” And “The best month for access to winter kings is April for the fishermen who live South of Sitka.”

The data shows that high harvest rates were occurring in districts South of Sitka in the winters of 2015 and 2016 as well as in D113. In those years there was an unusual high abundance of small (but legal) fish on the West Coast. Though the season closed early in 2015 and 2016 (including in Sitka) the Districts south of Sitka in these years were within or above their historic percentages of the winter king catch.

It should be noted that around half of the trollers that fish Sitka Sound in the winter are not from Sitka. Though April is the best month for communities South of Sitka it is also the most productive winter month in D113 as well.

This proposal seeks to reallocate a portion of the winter fishery, which was developed in Sitka, to other communities. The Sitka folks also established the original fresh markets for winter king salmon.

Moving the winter line in 10 miles is a draconian change to what are the original winter troll grounds and is not justified by the data. It constitutes a reallocation of the winter fishery to other communities which, coincidentally, were late to the game.

### **Proposal 179: OPPOSE.**



This proposal is very similar to 178 but appears, at first blush, to be more egalitarian. All of the arguments presented above against Proposal 178 apply here as well.

The proposal suggests reductions in the winter troll fishery (WF) in area for all districts on the West Coast of SEAK and depends on two kinds of triggers. The first is general to all districts (30,000 fish caught by March 1<sup>st</sup>). The second is specific to the Districts mentioned and they are assigned individual percentage triggers.

The reallocation aspect of this proposal becomes obvious when looking at ADFG's data of historic percentages by District in the WF (below).

In District 104 (which is in the Craig area and is one of the areas Craig residents principally fish in the WF) the proposed trigger is 8% of the winter catch. In District 104 (no data from 2017) 8% of the WF has never been harvested. The highest % for D104 occurred in years 2006 and 2007 when 6% of the total WF was caught. The 20 year average from 1997 to 2016 for D104 is 2.1%. This proposal from the Craig AC sets the proposed trigger at four times the historic average for the Craig area.

Similar 20 year historic percentages for the entire WF (not just till March 1) are significantly smaller than those proposed as March 1 triggers for Districts 105, 109, and 183. The 20 year average % for D105 is 6.35%, for D109 it is 4.65%, and for D183 it is 8.3%.

The 20 year average for D113 (Sitka) is 64.65% of the WF. The proposed trigger is 65%.

It is highly unlikely that any of the districts mentioned in this proposal will ever be reduced under the regime proposed except, of course, D113.



This proposal is a sly and cynical attempt at reallocating fish and should be rejected by the Board.

Winter Troll % of Regional Harvest by District: 1995-2016

Troll Season	101	102	103	104	105	106	107	108	109	110	111	112	113	114	183
1995	0%		2%		5%	1%	1%	1%	7%	10%	0%	0%	58%	13%	1%
1996	0%	0%	0%		5%	2%	2%	3%	5%	23%	0%	1%	35%	21%	1%
1997	0%	0%			6%	1%	0%	1%	4%	5%		0%	72%	11%	1%
1998	1%	0%	0%	1%	3%	0%	0%	0%	3%	5%	0%		79%	8%	0%
1999	0%	0%	1%	0%	6%	1%		0%	6%	4%		0%	74%	6%	1%
2000	0%	0%	1%	0%	4%	1%	0%	0%	4%	2%	0%	0%	80%	4%	3%
2001	0%	0%	1%	0%	4%	0%	0%	0%	3%	3%	1%	0%	70%	7%	9%
2002	0%	1%	1%	1%	4%	1%		0%	6%	1%	1%		71%	5%	8%
2003	0%	1%	2%	1%	3%	1%	0%	1%	2%	2%			74%	2%	9%
2004	0%	1%	2%	2%	9%	2%	1%	1%	8%	4%		0%	54%	6%	10%
2005	1%	0%	3%	4%	7%	1%	1%	1%	4%	3%	0%	0%	64%	4%	8%
2006	1%	1%	1%	6%	8%	1%	1%	1%	5%	3%	0%	0%	58%	4%	9%
2007	2%	1%	2%	6%	6%	1%	1%	2%	5%	2%	0%	0%	59%	3%	7%
2008	2%	1%	2%	4%	13%	2%	1%	2%	6%	5%	0%	1%	43%	4%	13%
2009	1%	0%	2%	1%	7%	2%	1%	1%	5%	5%	0%	1%	57%	5%	12%
2010	1%	1%	3%	2%	5%	2%	0%	1%	3%	6%	0%	0%	63%	3%	9%
2011	2%	2%	4%	3%	7%	2%	0%	1%	4%	5%	0%	0%	58%	2%	12%
2012	1%	1%	1%	2%	9%	2%	0%	1%	6%	4%	0%	0%	60%	3%	10%
2013	2%	2%	4%	4%	13%	2%	0%	3%	8%	2%	0%	0%	42%	1%	17%
2014	1%	1%	1%	1%	4%	1%	0%	1%	5%	3%		0%	69%	2%	10%
2015	0%	0%	1%	1%	5%	1%	0%	1%	3%	3%		0%	71%	1%	11%
2016	1%	1%	1%	3%	4%	1%	0%	1%	3%	2%	0%	0%	75%	1%	7%

### Proposal 181: OPPOSE.

In normal times I support what is called 60/40 (moving 10% of the summer troll king catch from July to August). This year, because of conservation issues with Alaska wild stocks, I don't support 60/40. In light of the arbitrary denial of the August opening [REDACTED] in the 2017 season it could place another 10% of the summer king season at risk.

### Proposal 183: SUPPORT.



I support this proposal and think it should be considered housekeeping. In the past the Department recommended moving west the Westward twin of the two markers representing the closed area in front of the Situk River because the river mouth was moving westward. The eastward twin should have been moved a corresponding distance westward at the same time. It wasn't. Not moving the east marker represents a loss of several miles of fishing ground to the Yakutat fleet for no reason.

**Proposal 185: OPPOSE.**

Another Tri-Annual favorite. This proposal seeks to create a personal use gillnet fishery on Chinook and Coho. There are already too many demands on SEAK Chinook and a personal use gillnet fishery would be entirely new with negative Pacific Salmon Treaty implications. More than adequate opportunities to harvest king and coho salmon exist with the use of sport poles. Someone in SEAK who can't catch enough salmon with a sport pole for personal use is not trying or has a hidden agenda.

Yours  
Matthew Donohoe



## Comments on the Unuk River Action Plan (UAP)

To: Chairman of the Board of Fish and BOF Members, [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

From: Matthew Donohoe, PO. Box 3114, Sitka Ak, 99835

Mr. Chairman,

I will try to keep my comments brief in part because like everyone else I've had little time to study this plan over Christmas and because unlike the NBA comments to the BOF are better if they're short.

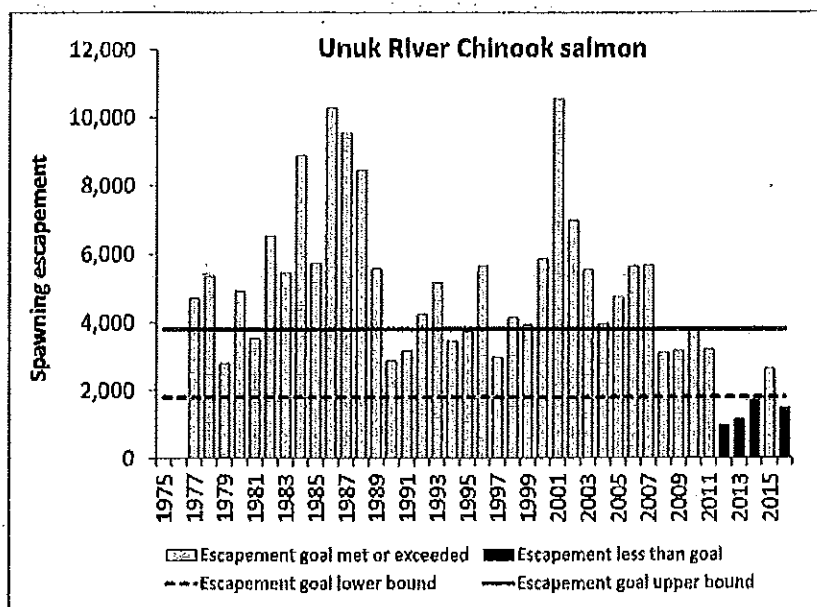
- 1) This winter the Department has often repeated a form of the following statement which is quoted from page 2 of the UAP under the title **Escapement**:

"From 1977 to 2011, the Unuk River met or exceeded the lower bound of the BEG every year. From 2012 to 2017, the Unuk River missed the lower bound of the BEG in 5 of the last 6 years, despite restrictive actions taken in the sport and commercial fisheries since 2014."

On page 3 under the heading Escapement Goal History one finds that the Department in 2009 nearly tripled the lower end of the BEG from 650 large Spawners (LS) to 1,800 LS. The Department more than doubled the upper range of the BEG from 1,400 LS in 2008 to 3,800 in 2009.

One of the years, 2001, of the base line (1982 to 2001) which was used to establish the new BEG had the largest return on record. The period from 1982 to 1989 had the greatest collective Unuk returns on record. (Data from "Review of Salmon Escapement Goals in SEAK, 2017". Fisheries Manuscript Series NO. 17-11, Appendix Figure A3). That baseline didn't suffer the negative effects from sport lodges that exist today but didn't then. These lodges are north of Clover Pass on the Unuk corridor and their catch is not sampled by the Department.

Had the 2008 BEG been in effect in 2014 and 2016 the returns in those years would have been **above the upper boundary of the BEG**. Even the dismal lowest recorded return of 2012 would have been above the lower boundary. **Had the 2008 BEG been in effect the Unuk would not be a system of concern today.**



Appendix Figure A3.—Estimated Unuk River Chinook salmon escapements, 1977–2016, and biological escapement goal range of 1,800–3,800 large spawners.

36

Is it possible that the BEG is set too high? Is it also possible that Sports Division needs to do more sampling?

- 2) **Coded Wire Tag (CWT)** data show no Unuk River Tags in the Ketchikan sport fishery in 2016 and 2017. In 2017 there were over 1,000 king salmon turned in to the annual Ketchikan Derby. Zero Unuk tags from 1,000 large derby kings (Spawners?) caught in Unuk River corridors seems unlikely.

UNUK CHINOOK												10 yr	5 yr	
Fishery	Quadrant	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	07-16	12-16	2017
Sport Early <sup>5</sup> April-July	NW	124	16	69	111	73			81		161	64	49	
	NE	0	0	0	0	0	0	0	0	0	0	0	0	
	SW	16						30		32		8	12	
	SE (KTN)	118	35	190	236	119	250	102	21	47		112	84	0
	Total	258	52	259	347	192	250	132	102	79	161	183	145	0
Sport Late <sup>6</sup> August	NW					39						4	0	0
	NE					35						4	0	0
	SW		0	0	0	0	0	0	0	0	0	0	0	0
	SE	88			35							12	0	0
	Total	88	0	0	35	75	0	0	0	0	0	20	0	0





### **Is it possible Sports division isn't sampling enough?**

Last August Trollers were not allowed their second opening and forewent 32,000 king salmon. The data supporting that closure was from genetics. Concern over no Unuk tags from the Ketchikan sport harvest caused trollers to question that information. The department assured us that the genetic data tells a different story and **indicated that genetic information showed a significant sport harvest of Unuk stock in the Ketchikan area. Yet the gear catch percentages of Unuk River fish in the UAP are based on CWTs.** Why is this?

Why were Trollers closed based on Genetic data last August but there is now a proposal based on CWT data for a delayed July king opening this coming season? CWT data and genetic data can contradict each other as it did last August. CWTs indicated a lower catch of AK wild kings in the troll fishery in August than in July but the genetics said otherwise according to Deputy Commissioner Swanton.

### **What is this cherry picking of data from the Department?**

- 3) **Delayed July 1<sup>st</sup> opening.** In the UAP Troll Options B and C king fishing is delayed by 1 week and 2 weeks respectively. As far as I can tell other fisheries are normalized by July 1<sup>st</sup>. ADFG informs us that Alaska wilds are available to harvest in May and June. The genetic data indicates that later in the summer more AK wilds (feeders for which trollers were closed last August) are available then in July. Because trollers rarely (if ever) fish kings in July after the 10<sup>th</sup> **there is no modern data on the makeup of harvest later in the month.** So why move the troll king opening back one or two weeks? Besides this almost all troll harvest of king salmon in the summer occurs on the ocean hundreds of water miles away from Alaska's wild systems.

5 AAC 29.050 (c) states "Before 1981, the commercial salmon troll fishing season was year around with a winter season of Oct 1 through April 14 and a summer season of April 15 through Sept 30. Since 1981 the opening of the summer season has been delayed by one month to an opening date of May 15 to provide for a three-cycle king rebuilding program." Today the summer season doesn't open until July 1.

In Addition the department is intending to deny trollers harvest rights to hatchery fish, paid for by trollers, in April, May, and June. At the same time the Department intends to allow other gear groups access to these fish including sport fishermen who pay nothing for these kings.



As stated in Alaska Regs Trollers have been rebuilding AK wild king stocks since 1981. In the meantime another gear group was born and now, for some reason, that group can target kings in April May and June in unlimited areas but trollers can't fish the postage stamps provided by the Department.

- 4) **Maps:** There are two maps depicting troll areas. One troll map says that trollers fish all of Southeast Alaska. The other map depicts troll hatchery areas in June. There is no map indicating that sports fishing occurs in all of SEAK all year but the troll maps imply that trollers fish king salmon in all of SEAK all year rather than 1 -2 weeks in July and restricted areas the rest of the time. There are also more "traditional" gill net areas than depicted by the maps (figure 3).

This could be deceptive to someone who doesn't know the areas and the fisheries.

Yours

Matt Donohoe



From: Matthew Donohoe, PO. Box 3114, Sitka AK, 99835

To: The Board of Fish, dfg.bof.comments@alaska.gov

Mr. Chairman and BOF Members,

There are two more items that I believe should be discussed which are not Action Plans or Proposals.

The first is Marked Select Fisheries (MSF). Why is ADFG pursuing MSF without vetting the concept before the BOF? On whose authority is the State of Alaska lobbying the Federal Government for funds to do this? There has been no proposal put before the BOF by the Department for MSF.

Why did [REDACTED] usurp the BOF approved management plan and close trollers last August denying them 32,000 treaty kings to return an estimated 160 kings to Alaska's wild system. The State of Alaska had already agreed to the harvest of these fish at Treaty. It's estimated that this cost the SEAK region \$10,000,000 in much needed revenue. Does the Board intend to allow this with no comment?

Yours

Matt Donohoe



Submitted By  
Matthew Jackson  
Submitted On  
12/14/2017 7:50:44 PM  
Affiliation  
Concerned Citizen

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~~Dear Board of Fisheries,

The Herring Sac Roe fishery has a long and contentious history. Since the tribal community starting writing resolutions to stop the herring fishery in lower Chatham decades ago, subsistence users have been given excuses for one reason the commercial fishery must happen or another. But every conscientious examination of the issue shows that conservation and subsistence use must take precedence over a commercial sac-ro-e fishery.

Everyone wants a piece of the pie, but the rule of law says that whoever had the pie first should keep it. When it comes to herring, the Tlingit people have had a relationship with herring since time immemorial, herring is their pie to share, and for decades the tribal community in Sitka has demanded more conservation of the herring.

The fundamentals of conservation dictate that we should err on the side of caution when it comes to managing populations. Herring fisheries up and down the Pacific Northwest Coast have collapsed, and the Sitka Sound population the last sizable population. The fundamentals of fishery management dictate that we manage this last viable population conservatively.

Herring play a fundamental role in the marine ecosystems that support all of Alaska's fisheries. Yet the sac-ro-e fishery is extremely wasteful. Subsistence users have always known, and Alaskan statute dictates, that wasteful harvest is unethical. Yet the sac-ro-e fishery is mostly waste. It's like killing herds of deer but only harvesting the livers. Everything but the roe is ground up into fish meal for fertilizer or worse, to feed farmed fish, including BC salmon farms. Common sense would dictate that these herring are more valuable feeding endangered wild Alaskan salmon than supporting the threat of farmed salmon.

For these reasons, based on traditional knowledge that stretches back thousands of years longer than ADF&G's limited data, based on decades of testimony from Sitkans of every race, I urge the board to approve Proposal 99, to cap the sac-ro-e fishery at 10% of biomass.

Sincerely,

Matthew Jackson



Submitted By  
Max J Kritzer  
Submitted On  
12/24/2017 8:57:45 AM  
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I support Proposal 99 to reduce the maximum harvest of Sitka Sound herring from 20% to 10%, and Proposal 106 to expand the waters preserved for subsistence harvesters. Subsistence is not merely a way to put food on the table, but an essential way of life that should not be ignored.

Thank you



Submitted By

Max Worhatch

Submitted On

12/16/2017 11:44:35 AM

Affiliation

Dungeness crab permit holder

Proposal 54. OPPOSE. While I agree that areas that have not been effected by sea otter predation have become saturated with gear, calling for a reduction of gear is not a responsible choice in that it does not address the cause of the problem. Areas that hold a viable population of marketable crab will still see large amounts of gear. Less gear will likely result in shorter soak times, likely increasing handling and mortality of soft and sub-legal crab. This fishery has a unique challenge that cannot be addressed or fixed with restrictive measures imposed on the fishing fleet. As more area is lost to sea otter predation, gear will become even more saturated. If adopted, this proposal would set a precedence of gear reduction that isn't sustainable. Past gear reduction by the board of fish in the past have not resulted in a rebound in stocks, or improved the economic viability of those fisheries. I think it is important to retain the fishery as is. Dungeness stocks have always been cyclitic. In the event of a high abundance of crab, it is important to retain our ability to harvest the maximum sustainable yield. The loss of 20% of our gear could result in a loss of revenue for coastal communities, fishermen, processors, and the state through raw fish taxes in those years of high abundance. dungeness crab in southeast is an important fishery. It is a vital part of a diversified fleet's business plan.

Proposal 55- OPPOSE. This proposal, while inventive, would consolidate operations. It would also change the make up and efficiency of the current fleet. Over time, it might reduce the actual amount of gear, but current CFEC regulations prohibit fishing more than one permit by one person. This would require a vessel to have multiple permit holders which would probably preclude it from achieving its intent.



Chairman Jensen and Board of Fishery members;

Please find my comments on proposal 235 below. I would like to thank the board for taking this proposal on. I had every intent on submitting a similar proposal, like I did for the 2015 cycle, but I found myself distracted by finfish proposals, and I simply forgot. Chairman Jensen encouraged me to submit an ACR. Your willingness to take this issue on is encouraging, not only to me, but the vast majority of permit holders in this fishery that I have spoken with concerning this management plan. My only concern at this time is that because this proposal was put forth late, some AC's and individuals may not have been aware of it, and therefore may neglect to comment.

Proposal 235-SUPPORT Having been a participant in this fishery for 27 seasons, I am a firm believer in the 3 S management as adequate to manage this fishery. If this proposal were adopted, southeast Alaska would still probably be the most conservatively managed Dungeness fishery on the planet. We currently have the largest minimum size limit at 6.5 inches. This ensures no retention of breeding stock. Virtually all other Dungeness stocks on the west coast have a minimum size of 6.25 inches and have been successful for decades. Like other areas, we take only male crab. This ensures that fertile females will be available to ensure future generations of crab. Currently in southeast Alaska, we have a four month season, June 15- August 15, and October 1-November 30 for the bulk of the region. Districts 1 and 2, and parts of 13, have a five month winter season, starting October 1 and ending February 28. These areas are generally only fished into November as processors close their doors due to low volume and effort. The vibrant successful coastal fisheries of California, Oregon and Washington seasons start as early as December 1 and continue through the month of August.

The current management plan is the result of a Board of Fisheries directive to come up with a management plan since there was no biomass estimate available. A task force was formed. In discussions with stake holders on the task force, they felt that the probability that an early closure due to poor landings in the first 7 days of the fishery were miniscule. Basically, the long term average season, 2.25 million pounds, became the goal to prosecute a full season. The department would take the first weeks catch, compare to the first weeks catch average, to predict a final catch estimate for the entire season. It was a pretty simple abundance based formula that worked well for a number of years. Even with some low cycle years, a full season was prosecuted. What wasn't foreseen in this management plan was a loss of commercially viable area due to sea otter predation. The long term averages used in the plan include fishing effort in areas that are either no longer used, or at best sparingly by few fishermen. Since then, we have lost virtually all of district 4 and 5, most of district 9, vast portions of district 6 and 14, and parts of district 10 and 12. To prosecute a full season districts 15, 11, what's left of 10, 9 and 6, 8 and 7 must be able to produce enough in the first week that was once spread over these foregone areas. It is apparent that in low cycle years like 2013 and 2017, the only years that there has been an early closure, that those areas cannot meet that poundage goal necessary to prosecute a full season. It is also important to note that the poundage of districts 1 and 2, while a part and parcel of the full poundage consideration of the season, cannot contribute to the formula of the first weeks catch.

It's my belief that the plan has also increased the pace of the fishery. Since the fate of a full season is based on the first week's deliveries, in low cycle years the onus is on fishermen to deliver as many crab as possible the first week. This may have led to more soft-shell retention by some, since it will be pounds on a fish ticket. Fishermen fishing in remote locations, are encouraged to unload to tenders to get deliveries in and continue fishing. Excessive handling reduces quality through leg loss, and increases the risk of dead loss.



Economically, this management plan is a millstone. It throws an uncertainty into the fishery that needn't exist. In 2013, for the first time, I chose not to participate in the summer fishery because I knew that making the threshold was probably not a reality and I did not want to have to go through effort and expense associated with trying to juggle two fisheries and attending the birth of my fourth child on the 17th of July. I had no way of knowing when the fishery would close if threshold was not met. Dungeness is an important and major part of my income most years, and it was a hard decision to make. It was foregone income, and a choice I made and accept. Without the management plan, and the guarantee of a full two-month summer season, I would have fished, and made some money, though probably not a lot. In 2017, I fished for about 7 days in the summer. After a few phone calls to friends fishing in other areas and talking to processors concerning current landings, I put my gear on the beach, as it was apparent that threshold would not be made. I had no idea when the season would close. The department couldn't tell me, because they didn't know. Had I known that it would close July 25, I probably would have kept on. I was making money. It wasn't as hard of a decision, since salmon prices were high and there were fish around, but again, I missed out on income I rely on due to this flawed plan. That's just my story. There are people who fish in Bristol Bay, who seine in southeast, trollers, gillnetters, guys who deckhand in the bay or seiners who also had to make choices similar to mine. Then we have the people who rely on this fishery alone as their primary income. They have to make the decision to risk running and looking for crab in a place that maybe nobody had gotten to, but not knowing when the season would end made that a huge risk. In low abundance years, effort in this fishery wanes, regardless if there is a closure or not. A large percentage of the participants are involved in other fisheries, and either do both or stack their gear. This allows those who are more dependent to pursue the fishery and capitalize on crab that will emerge later, or find some area that those who are doing other things missed. The foregone economics in this fishery with this particular management plan extends beyond fishermen. Processors have to gear up for a season just like fishermen. There are costs associated with that. Municipalities lose sales tax revenue from foregone bait sales, fuel and gear. Local businesses forgo sales of gear and hardware associated with the fishery. The state of Alaska and municipalities lose raw fish tax revenues. Coastal communities, especially Petersburg and Wrangell, but also Haines, Juneau, Sitka, and Ketchikan, all take a hit when this management plan mandates an early closure.

In 2013 and 2017, following the early closure of the summer fishery, there were good fall seasons. Some may point to this and say that closing early on slow summer will lead to a better fall, so this plan works. In 2013, The summer season ended 8 days earlier than usual. While the information is confidential, it is important to know that fishermen were catching crab that summer that emerged later in that summer season. The early closure actually cost those particular guys money. Since the season was only curtailed a week, a full two months were prosecuted for the fall season. In 2017, the lowest commercial harvest for a summer fishery on record (also the shortest. kind of self-explanatory), we also saw a reasonably good harvest in the fall fishery. It would have been a much better harvest had we been given a full two months. The crab in both these fall seasons was dominated by recruit crab. In the case of 2017, had we fished an entire summer season, we may have well seen these crab. My point with all of this is that we had good falls despite the management plan, that these harvests had little to do with the management and more to do with the fact that the summer season was dominated by the last dregs of the last strong cycle and the good falls were the beginning of the next strong cycle.

I've been fishing my whole life. I fully understand protecting the resources I derive my income from. I've been an advocate for all commercial fisheries and the importance of them to this state and our coastal communities. If I believed that our current management plan had any tangible effect on preserving this fishery for the future, I would be in favor of it. I see none.





Sincerely,  
Max Worhatch



Submitted By  
Michael Thelander  
Submitted On  
12/27/2017 12:29:04 PM  
Affiliation

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To Whom It May Concern:

I have been fly fishing on the Tsiu for about the last fifteen years. With family and work, I don't make it every year, but I've been there about six times, spending up to a week each time that I come. Each trip brings in several thousand dollars to the local community, including hotel and meals in Cordova, as well as fees to stay at the lodge (Alaska Wilderness Outfitting Company)

The Tsiu is a treasure for anyone that loves sport fishing and a day spent on the river makes up for all the times I don't catch a fish when fishing somewhere else.

I understand the need to balance the needs of sport fishermen and commercial fishermen, but after spending several weeks in total on the river over the last decade, I also know the two entities can't reasonably fish in close proximity to each other, let alone on the same stretch of water.

The motorboats used by the commercial fishermen to herd the fish into the nets represent a great hazard to anyone standing in the water. I've seen boats "buzz" fishermen, sometimes passing in between a group of men/women fishing. We (sport fishermen) want to fish where the fish are congregating and they (the commercial fishermen) want to draw out those fish and chase them into their nets. At a minimum, the commercial fishermen turn a tranquil day into a somewhat stressful day since I never know when a boat will keep moving closer and closer to me until I'm forced to go somewhere else.

Given the remote location of the Tsiu, it isn't reasonable to expect everyone to play fair and unfortunately us sport fishermen have a distinct disadvantage - we use fly rods instead of nets and we navigate the water in our waders instead of in a motorized boat.

The only viable option is to mandate fishing zones that are restricted to each party with a measurable distance in between each zone to protect both parties' interests. I understand there is a proposal to reduce the distance to only 1/4 mile instead of a 1/2 mile. The latter distance, if not larger, is much better to preserve the tranquility of fishing on the Tsiu without fearing life and limb or a busted rod and lost line. At the same time, the commercial fishermen will have ample stretches of the river to meet their quotas.

Sincerely,

Mike Thelander



Submitted By  
Michelle Putz  
Submitted On  
12/14/2017 7:44:35 PM  
Affiliation

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Dear Board of Fisheries,

I am writing in support of Board of Fisheries Proposals 99 and 105 and in opposition to Proposals 94 and 104.

Having lived in Sitka for over 12 years, I have seen and experienced a dramatic decline in the areas of heavy spawn, have had trouble catching herring in places where they were formerly common, can no longer supplement my garden with herring spawn (simply because it is less and less available), and worry that we are over-harvesting a species and population that is under multiple stressors. We need to consider the combination of ocean warming, ocean acidification, microplastics, and other environmental stressors as we make decisions on harvest. Being conservative in our harvest levels as suggested in Proposal 99, and providing protected areas for herring production provides future flexibility for the stock and for future fisheries managers.

Additionally I recognize and support the subsistence harvesters of Sitka. The Alaska State Constitution has a subsistence priority for all resources. And many of my friends and neighbors have clearly indicated that they cannot meet their subsistence needs. Conservative management now protects everyone's interest as we move into an uncertain future.

Please support Proposals 99 and 105; please oppose 94 and 104.

Sincerely,

Michelle Putz



Submitted By  
mike fox  
Submitted On  
12/5/2017 8:15:50 PM  
Affiliation  
Alaskan resident  
  
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Address  
3502 Sierra St  
Juneau, Alaska 99801

This comment is in support of proposal 194.

The residents of Juneau are surrounded by commercial fisheries, yet they are not provided with any "fair and reasonable" opportunities to personal use fish for salmon. It is certainly in the "broad public interest" of the residents of SE Alaska to allow personal use fishing in areas like district 15.

Submitted By  
mike fox  
Submitted On  
12/9/2017 9:19:13 PM  
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Juneau, Alaska 99801

Comment in support of proposal 194.

There is no justifiable reason to prohibit residents from personal use fishing in areas with salmon populations large enough to support commercial fisheries.

The argument that too many SE residents would participate in a fair, reasonable, and efficient personal use salmon fishery, illustrates that this is in the "broad public interest".

And, if only a few residents participate, there is no justifiable reason to prohibit it.



Submitted By  
mike fox  
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12/5/2017 8:17:27 PM  
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Alaska resident

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Comment in support of proposal 192.

The residents of Juneau are surrounded by commercial fisheries, yet they are not provided with any "fair and reasonable" opportunities to personal use fish for salmon. It is certainly in the "broad public interest" of the residents of SE Alaska to allow personal use fishing in areas like district 11.

Submitted By  
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12/9/2017 9:18:16 PM  
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Comment in support of proposal 192.

There is no justifiable reason to prohibit residents from personal use fishing in areas with salmon populations large enough to support commercial fisheries.

The argument that too many SE residents would participate in a fair, reasonable, and efficient personal use salmon fishery, illustrates that this is in the "broad public interest".

And, if only a few residents participate, there is no justifiable reason to prohibit it.



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12/5/2017 8:27:23 PM  
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Comment in support of proposal 137.

It is unreasonable to restrict residents to a single day's possession limit in king salmon sport fisheries that require long travel distances. For example: From Juneau to the outside coast. It would be simple, reasonable, and in the broad public interest, to allow anglers to possess 2 daily bag limits (and immediately recording retained fish).



Submitted By  
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12/9/2017 8:49:40 PM  
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Comment in support of proposal 185.

**In SE Ak. ADF+G is failing to honor the intent of the Personal Use fishing law.**

Intent being....

*The underlying purpose of the board's creation of the personal use fishing category was to allow efficient harvesting of fish by individuals who were precluded from participating in subsistence fisheries.*

The AG opinion dated 3/21/96 describes the intent of Personal Use fisheries.

MEMORANDUM State of Alaska Department of Law

TO: The Honorable Frank Rue DATE: March 21, 1996

Commissioner

Department of Fish and Game FILE NO.: 663-96-0266

TELEPHONE NO.: 465-6725

SUBJECT: Interpretation of "Personal Use

Fishing"

**I. QUESTIONS**

ou have asked for an interpretation of the term "personal use fishing." This term is defined at AS 16.05.940(24) and 5 AAC 77.001(f).

Under the statutory definition: "personal use fishing" means the taking, fishing for, or possession of finfish, shellfish, or other fishery resources, by Alaska residents for personal use and not for sale or barter, with gill or dip net, seine, fish wheel, long line, or other means defined by the Board of Fisheries[.] AS 16.05.940(24).

**The underlying purpose of the board's creation of the personal use fishing category was to allow efficient harvesting of fish by individuals who were precluded from participating in subsistence fisheries.** See, e.g., 5 AAC 77.001(a); Letter from Don W. Collinsworth, Commissioner, ADF&G, to Robert Willard, Chairman, Legislative Affairs Committee, Alaska Native Brotherhood (Sept. 6, 1984).

The legislative history indicates that the definition and related provisions were intended to authorize the board to adopt regulations allocating fishery resources for purposes of personal use and to **require the board to provide a "fair and reasonable" opportunity** for sport, commercial, **and personal use fishing**. See, e.g., 1985 House J. 584-585, 920-921, 1230-1231

Juneau residents' are unfairly, and illegally, disenfranchised from their fisheries resources.

- 1 - The federal government has designated Juneau residents as urban, and disqualified them from participating in any federally managed subsistence fisheries anywhere in Alaska.
- 2 – ADF+G has designated the Juneau area as a "non subsistence use area" and prohibits all subsistence fishing.
- 3 – ADF+G has banned personal use fishing for king and coho salmon throughout SE Alaska (5AAC 77.682 c.)
- 4 – ADF+G provides very few personal use fishing opportunities for other species of salmon in SE.



5 – ADF+G conducts commercial salmon fisheries in waters throughout SE including areas immediately surrounding Juneau.

6 - In other areas if the state ADF+G provides residents many subsistence and personal use salmon fishing opportunities.

7 - ADF+G allows all (resident and non resident) commercial fisherman unlimited personal use fishing (home pack). 5AAC 39.010(a) *A person engaged in commercial fishing may retain finfish from lawfully taken commercial catch for that person's own use.*

**All SE Ak residents are entitled to a fair and reasonable opportunity to efficiently catch a “home pack”.**

And, it's the law.

*References.*

*AS.16.05.251 (d)...{**shall**} provide a fair and reasonable opportunity for the taking of fishery resources by personal use, sport, and commercial fishermen.*

*The board promulgated the following regulation that is contrary to AS16.05.251(d).*

*5AAC 77.682 (c) Personal use salmon fishery. The department will not issue a permit for the taking of king or coho salmon...*

*(Home pack regulation) 5AAC 39.010 (a) A person engaged in commercial fishing may retain finfish from lawfully taken commercial catch for that person's own use.*





Submitted By  
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12/9/2017 9:04:03 PM  
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Comment in support of proposal 185.

It has been consistently demonstrated over the years that the most effective way to influence board decisions is to attend the meetings and lobby ADF+G management and board members. Average Alaskan Residents suffer an extreme disadvantage in this regard.

The overwhelming majority of people in attendance at SE board meetings are involved in the fishing industry. And, because it is their business, they can afford the time and expense to be present.

I ask the Board to respect, and fairly represent, the "broad public interest" as required by law.

I ask the Board to consider the interests of all the residents of SE Alaska, including those who cannot afford the time or money required to attend your meetings.

I ask the Board to remember that very many SE Alaskans are confused and intimidated by the regulatory and management process.

I ask the Board to consider the people who can't make sense of the process and are relying on THEIR board to be fair.

Having fish to eat is extremely important to many SE residents, and all residents deserve a fair and reasonable opportunity to catch them efficiently.

Submitted By  
mike fox  
Submitted On  
12/9/2017 9:20:12 PM  
Affiliation  
Ak. Resident

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Address  
3502 Sierra St  
Juneau, Alaska 99801

Comment in support of proposal 185.

There is no justifiable reason to prohibit residents from personal use fishing in areas with salmon populations large enough to support commercial fisheries.

The argument that too many SE residents would participate in a fair, reasonable, and efficient personal use salmon fishery, illustrates that this is in the "broad public interest".

And, if only a few residents participate, there is no justifiable reason to prohibit it.



Submitted By  
mike fox  
Submitted On  
12/10/2017 7:40:50 AM  
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Comment in support of proposal 185.

It is outrageously unfair, unreasonable, and contrary to state law and intent, that ADF+G bans personal use fishing for king salmon and coho salmon in SE Alaska.

*5AAC 77.682 (c) Personal use salmon fishery. The department will not issue a permit for the taking of king or coho salmon...*

This fact alone, clearly illustrates the extreme bias that exists within ADF+G management in SE Alaska.



Submitted By  
mike fox  
Submitted On  
12/5/2017 8:06:34 PM  
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3502 Sierra St  
Juneau, Alaska 99801

Comment in support of proposal 185.

"Personal use" was adopted with the intention of providing efficient fishing opportunities to all Alaska residents regardless of race or lifestyle. No matter who you are, or where you live, if you are an Alaskan, you can personal use fish. ADF+G is obligated by law to provide "fair and reasonable" personal use fishing opportunities. If we have enough fish to support a commercial fishery we certainly have enough fish to allow residents a personal use fishing opportunity. ref: AS16.05.251(d).



Submitted By  
mike fox  
Submitted On  
12/27/2017 10:50:36 AM  
Affiliation  
SE Alaska resident

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3502 Sierra St  
Juneau, Alaska 99801-9053

AG opinion dated 3/21/96 describes the intent of Personal Use fisheries.

MEMORANDUM State of Alaska Department of Law

TO: The Honorable Frank Rue DATE: March 21, 1996

Commissioner

Department of Fish and Game FILE NO.: 663-96-0266

TELEPHONE NO.: 465-6725

SUBJECT: Interpretation of "Personal Use Fishing"

#### I. QUESTIONS

You have asked for an interpretation of the term "personal use fishing." This term is defined at AS 16.05.940(24) and 5 AAC 77.001(f).

Under the statutory definition: "personal use fishing" means the taking, fishing for, or possession of finfish, shellfish, or other fishery resources, by Alaska residents for personal use and not for sale or barter, with gill or dip net, seine, fish wheel, long line, or other means defined by the Board of Fisheries[.] AS 16.05.940(24).

**The underlying purpose of the board's creation of the personal use fishing category was to allow efficient harvesting of fish by individuals who were precluded from participating in subsistence fisheries.** See, e.g., 5 AAC 77.001(a); Letter from Don W. Collinworth, Commissioner, ADF&G, to Robert Willard, Chairman, Legislative Affairs Committee, Alaska Native Brotherhood (Sept. 6, 1984).

The legislative history indicates that the definition and related provisions were intended to authorize the board to adopt regulations allocating fishery resources for purposes of personal use and to **require the board to provide a "fair and reasonable" opportunity for sport, commercial, and personal use fishing.** See, e.g., 1985 House J. 584-585, 920-921, 1230-1231

---

It is wonderful that management provides a way for all commercial fishermen to efficiently fulfill their salmon personal use needs. They are allowed to catch all the salmon that they, and their family and friends, need pursuant to 5AAC 39.010(a).

Most other SE Alaskans are also busy earning their living during the summer. Tourism, construction, fish processing, and their support industries are at their busiest during the summer. Those SE residents deserve a fair and reasonable opportunity to efficiently fulfill their salmon personal use needs as well.

It is clearly unreasonable, unfair, contrary to state law, and contrary to the intent of the personal use fishing category, to restrict most of the residents of SE Alaska to fulfill their personal use fish needs by purchasing fish, or by sport fishing.



Submitted By  
MJ Westall  
Submitted On  
12/27/2017 11:55:01 AM  
Affiliation

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645 G street #571  
Anchorage, Alaska 99501

## Proposal 165

To Whom It May Concern,

I have been coming to the Tsiu since 2014 and have fished all over the state. I believe that the Tsiu is the most pristine and premier Coho fishery in the state of Alaska. I had knee surgery a couple of years ago and have some difficulty maneuvering in the river. It is of great concern to my welfare when the boats are suddenly spiraling in the river disrupting the fish and my safety. When I learned there was a proposal to reduce the area available to avoid this disruption and danger associated with this type of commercial activity, I felt compelled to write this letter.

As a resident I urge you to allow as much area as possible for the sport fish users on the Tsiu River and to limit the unsafe boat activity of the commercial operators. If the proposal passes as written I will definitely rethink about ever coming back to the Tsiu and would discourage others as well as it just would not be a safe place to fish.

M. J. Westall



Submitted By  
Monica Lord-Wolf  
Submitted On  
12/28/2017 2:11:44 PM  
Affiliation  
Alaska Native Sisterhood

Phone  
907-440-5474

Email  
[lehua.otto@alaska.gov](mailto:lehua.otto@alaska.gov)

Address  
8616 Moorland Street  
Anchorage, Alaska 99502

PRO-Proposals 98,99,105,106 AGAINST-Proposal 104. During my first pregnancy in 1982 and each pregnancy thereafter, herring eggs helped in producing breastmilk, confirming it IS medicine for our bodies. Before the herring eggs, my body would not produce breastmilk for the baby. Because it is medicine for our bodies, as all of our food is, I support holding up title 8 of ANILCA on this issue and standing with the Sitka Tribes/Louise Brady.



Submitted By  
Nate LaPerriere  
Submitted On  
12/19/2017 5:54:07 PM  
Affiliation

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[natelaperriere@gmail.com](mailto:natelaperriere@gmail.com)  
Address  
2212 SMC RD  
2212 SMC RD  
Sitka, Alaska 99835

Dear Board Of Fisheries,

Hi my name is Nate LaPerriere, I am an eleven year old boy. Even in my life, I have seen a big change in the herring population. I used to go down below my house and try to catch herring with a net. But in recent years, I have seen very few if any herring spawn. I love playing on the beach, fishing, and netting herring as well as just listening to all the sea life.

My father has gone out with a friend commercial salmon fishing, as well as my family and I have gone out subsistence fishing for salmon. So as you can see my family and I rely on the herring, so I strongly support proposal 99 if anything. But I would rather stop the herring fishery altogether.

Thank you, Nate



Hello my Name is Nathan Bernhardt

I have snag herring in crescent harbor  
an AND harbor + Eleison harbor + Thompson  
harbor. I don't snag herring anymore  
except with my grandkids at  
Eleison harbor maybe 3-4 years ago.

I use to see herring Jamestown Bay  
an out towards Barrow. I would see  
herring in Sealing Cove harbor I don't  
see the herring anymore close to town  
an in harbor's maybe a little here  
an there. My uncle use to have a house  
on NPR around where the breakwater  
is. He use to take me to the tide  
pools an get herring out of them. 1968  
There was a lot of people setting 1969  
herring out of the tidepools. I don't  
see that anymore. I have 9th herring

egg's all my life + herring. I have been  
harvesting egg's for the last 15 years.  
My family has been harvesting for the  
last 40-50 years mostly my Brother  
Ernie Bernhardt an Jeff Bernhardt



~~I haven't been doing~~  
the areas like on HPR  
spanning very well. some times  
not at all an some times - spoty.  
There spoty in other areas to.  
an They seem to be spanning  
further away from town. like  
crow pass, an Hayward. ~~The~~

The fish in game seem to say  
that there is slot out there. Like  
on there soner. But usaly little come  
in. An the Seiner's seem to be  
fishing them out. They have to go  
further out to get them. All of  
the animals in an ground sitks depend  
on the herring. like whale's, sealions  
birds, fish, an human beings's.

I think the Herring Quota ~~to~~ should be smaller  
The Seiner's should take less

I don't want sitks to thank you,  
have no herring like  
other place's

Within Bernhardt  
Jeff Bernhardt  
Ernie Bernhardt  
Eileen Wagner



PC118  
2 of 2

Within Bernhardt  
P.O. Box 1312  
55th & Alameda  
99583

ADF&G Boats Support

P.O. Box 115526

Juneau, AK 99811-5526





Submitted By  
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Submitted On  
12/27/2017 12:03:12 PM  
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Ketchikan, Alaska 99901

I OPPOSE the following proposals: 79, 80, 81, 82, 83, 84, 140, 145, 148, 153. OPPOSE THEM ALL



Submitted By  
Nina Vizcarrondo  
Submitted On  
12/28/2017 6:14:20 PM  
Affiliation  
Alaska Native Sisterhood

Alaska, the only state where subsistence is a constitutional right.

If the government had protections for the fishermen (Magnuson-Stevens Conservation and Management Act) when the pink salmon failed to run, who protected/who will protect the subsistence fishermen when the herring or salmon stop running in Sitka?



Submitted By  
Nora Skeele  
Submitted On  
12/15/2017 9:42:18 AM  
Affiliation  
Commercial fisher, SE Alaska resident and subsistence fisher

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262 Kaagwaantaan st  
Sitka , Alaska 99835

Dear Board of Fish, I'm writing in support of proposal 99 to reduce the sac-roe guideline harvest to 10% of the biomass. Herring are a critical forage fish that are better left in the water to support our rich marine ecosystems and subsistence roe harvest. I strongly support proposal 99 because it would increase the amount of mature herring left in the water where they belong. We have seen a dramatic decrease in the herring spawn since it has been so heavily overfished. It has been deeply disturbing to the local people of Sitka to see the spawn decrease so drastically as something that used to be so reliable and abundant.

Thank you,

Nora Skeele



**NORTHERN**



**SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

(907) 747-6850  
FAX (907) 747-1470  
EMAIL [steve\\_reifenstuhl@nsraa.org](mailto:steve_reifenstuhl@nsraa.org)

1308 Sawmill Creek Road Sitka, Alaska 99835

December 15, 2017

### **Board of Fisheries**

January 15 – 23, 2018  
Finfish Sitka, Alaska

#### **Re: Support for Proposals 139, 149, 150, 173, 174, 176; withdraw support for Proposal 142, and opposition to Proposals 144, 146, & 147**

Dear Chairman Jensen and Board of Fish Members:

Northern Southeast Regional Aquaculture Association (NSRAA) has an elected board of sixteen fishermen representing all salmon permit holders in southeast Alaska; the board also has 9 appointed seats representing a broad interest of sports, subsistence, municipality, Native organization, conservation, and two interested persons. NSRAA authored four (4) proposals, one of which we withdraw support (142) and three of which we continue to fully support (139, 149, & 150).

NSRAA **supports** the following proposals:

**NSRAA Proposal 139 5 AAC 33.387** – Southeast Cove Terminal Harvest Area. In 2017, NSRAA took over ownership and operation of the Gunnuk Creek Hatchery and its remote release site at SE Cove. Currently, only cost recovery occurs at SE Cove, but once Alaska Department of Commerce relinquishes title to the last chum returns in 2019, NSRAA would like to have the ability to put any mix of troll, seine, gillnet, or cost recovery in SE Cove. In the next five years it is likely only seine, troll, and/or cost recovery would be allowed in SE Cove due to the imbalance of enhanced salmon vis-à-vis the Allocation Plan. However, when the allocation percentages change in the future, having the tools to make adjustments in gear harvest rates will be important.

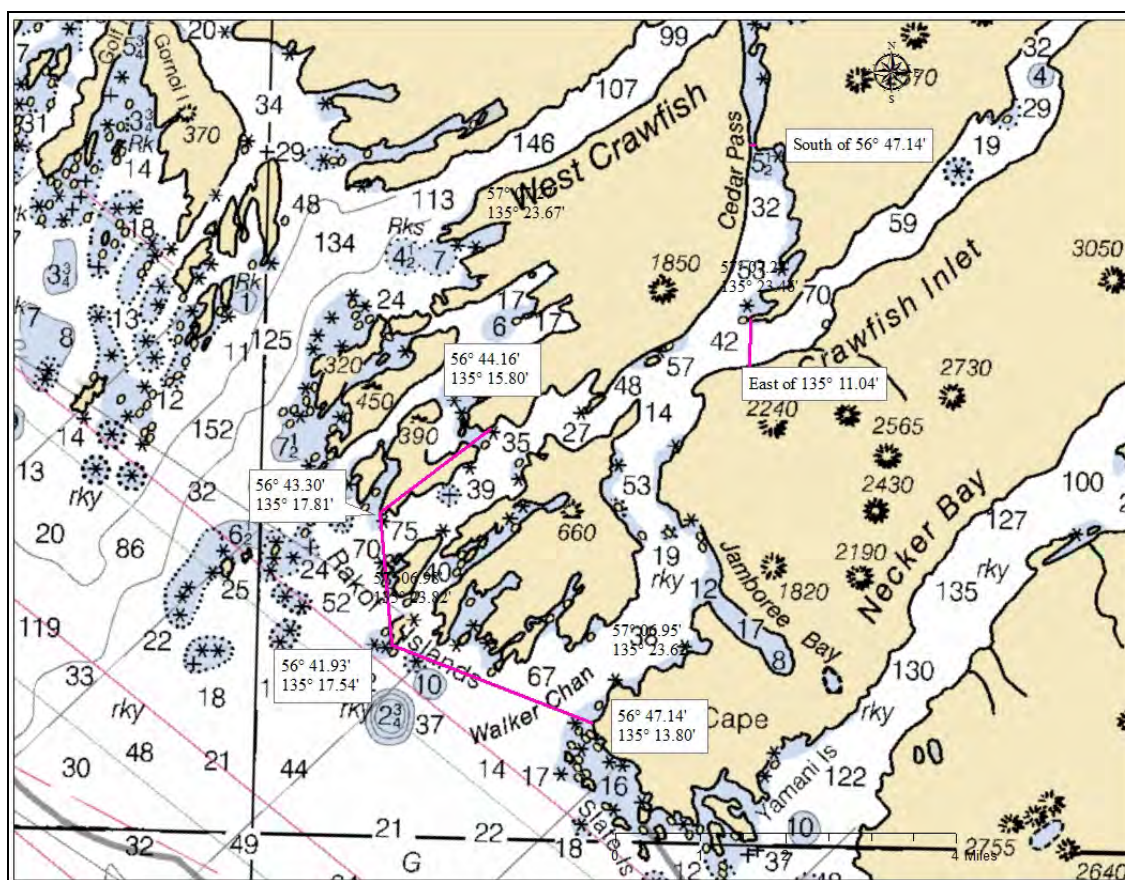
**NSRAA Proposal 149 – 5 AAC 40.042** – This is a housekeeping date change to the regulation for Deep Inlet season closure. The change simply substitutes October 31 for September 15. This does two things, 1) aligns the closure time at Deep Inlet with Bear Cove (already October 31) where coho broodstock are released and return and 2) allows coho harvest at Deep Inlet through the end of the run. The coho program at Deep Inlet has been developing over the past five years, but only now has come into full and robust adult



returns. Adult coho return from early August through the end of October; adopting the proposal would provide additional commercial opportunity without requiring Emergency Orders.

**NSRAA Proposal 150 – 5 AAC 40.042**– NSRAA has been operating a remote release site at Crawfish Inlet since 2015, with the first adults returning in 2017. Harvest by troll and seine cost recovery occurred via ADF&G announcement. NSRAA would like to establish a Special Harvest Area (SHA) in regulation for Crawfish Inlet based on boundary lines agreed to in consultation with ADF&G. This proposal would establish a separate boundary for troll SHA and a smaller more confined SHA for net gear and cost recovery. The intention of the expanded troll area is to provide additional opportunity, although it could only be used when ADF&G deems there is no conflict with wildstocks.

The first part of the proposal (a) (10) establishes the SHA boundaries and the second part (c) (10) establishes which gear types may be used within the SHA.



**NSRAA Troll Repeals Proposal 173 – 5 AAC 29.114 District 12 & 14 Chum Salmon Management Plan** – This is an existing regulation that sunsets December 31, 2017. This proposal would maintain the management plan in regulation, which is an important management tool that provides trollers access to enhanced chum salmon in Icy Strait and



upper Chatham Strait.

**NSRAA Troll Reps Proposal 174 – 5 AAC 29.114 District 9 & 10 Chum Salmon Management Plan** – NSRAA conducts a remote release program in S.E. Cove near Kake, Alaska and the Gunnuk Creek Hatchery. Large numbers of chum began returning to S.E. Cove beginning in 2016 with numbers expected to quadruple in the next couple of years. There is expected to be a troll opportunity along the northeast shoreline of Kuiu Island and on into Keku Straits near Kake. This proposal would establish a troll management plan for Districts 9&10 specific to this new harvest opportunity. The S.E. Cove program and this management plan is designed to benefit trollers and improve the allocation of S.E. enhanced salmon.

**Alaska Trollers Association Proposal 176 – 5 AAC 29.112 Management Chum Salmon Troll Fishery** – NSRAA operates a new chum and chinook program at Crawfish Inlet. NSRAA's Proposal 150 intends to establish a new SHA for Crawfish Inlet and we support inclusion of Crawfish Inlet as a SHA where chum trolling may occur when ADF&G deems prudent during the southeast wide coho troll closure. We support this Alaska Trollers Association (ATA) proposal.

NSRAA withdraws support for the following proposal

**NSRAA Proposal 142 – 5 AAC 33.376 Deep Inlet.** The NSRAA board of directors at its March 2017 meeting initiated Proposal 142 regarding modification of the Deep Inlet rotation schedule on a split vote. At the November 2017 NSRAA board meeting the board reversed (majority vote) its March decision and withdraws support of the proposal.

NSRAA opposes the following proposals:

**Oppose Proposal 144 – 5 AAC 33.376 Deep Inlet THA Management** – This proposal seeks to allow troll gear in Deep Inlet while there is gillnet, seine, or cost recovery harvest occurring. Allowing this would create chaos among the fishing boats, gear entanglement, and likely property damage. Trolling requires continuous forward movement at 2 to 3 knots while seine and gillnet gear is deployed in a line or arc, where it drifts at the mercy of currents or is towed under power. This proposal will promote conflict, and not solve a problem. The NSRAA board created a new chum program at Crawfish Inlet with specific troll priority to help the troll allocation imbalance.

The NSRAA board with seine, troll, and gillnet representatives voted to oppose this proposal.

**Oppose Proposal 146 – 5 AAC 33.364 S.E. Allocation Plan** – The 1994 BOF findings #94-02-FB state that production of non-regionals (DIPAC, SJC, & AKI) will be included in the allocation value. This is consistent with Alaska statutes in **Section 16.10.380** and **16.10.450**. This proposal is a tool to subvert the allocation imbalance by removing the largest gillnet value contributor (DIPAC) from the allocation plan in order to change the



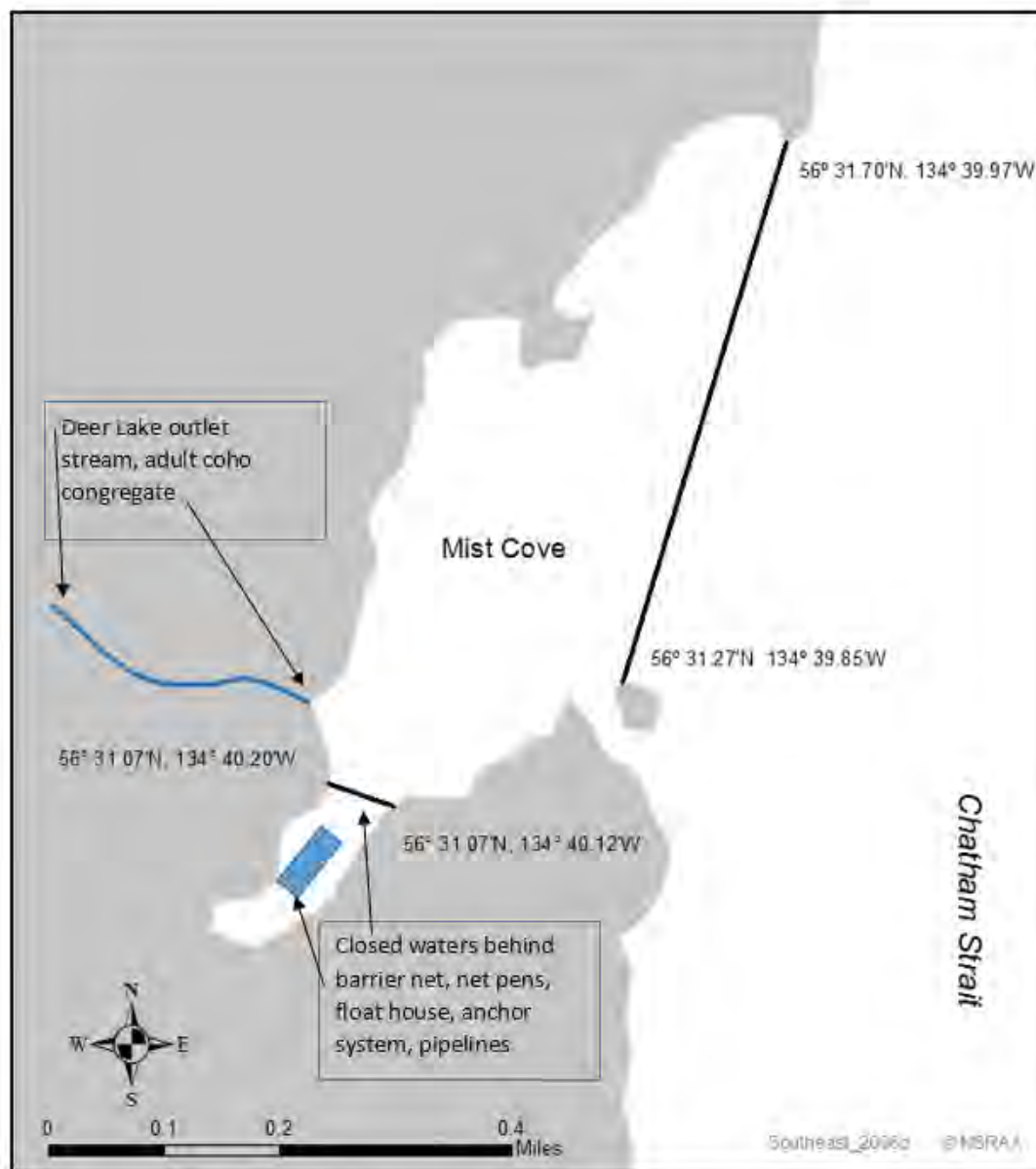
percentage of the group that is far above their allocation range. This is like two brothers receiving money from a parent, one gets a fifty dollar bill and one gets two fifty dollar bills. The first brother says, “That is unfair and not balanced”, and the second brother says “okay I’ll tuck one fifty in my back pocket so you can’t see it and therefore it won’t count.....problem solved”.

NSRAA continues to work diligently to solve the allocation imbalance through new production, not ledger domain. Major new chum production is in the ocean and expected to affect allocation percentages for the troll and seine fleets beginning in 2018 and 2020, respectively.

**Oppose Proposal 147 – 5 AAC 47.021 Mist Cove SHA Closure Exception** – This proposal requests an exception for one kind of sport fishing (fly-fishing) in a closed area of a SHA. If granted, this exception would create chaos in the non-fishing area. Currently the demarcation of non-fishing and fishing is clear. Having an exception to the rule would create a need for enforcement in a very remote area of the state (120 water miles from Sitka). NSRAA staff does not want to be in the position to judge who is fly-fishing and who is not.

Another concern is for safety and wellbeing of NSRAA staff in the closed area, which is quite small. Fly-fishing requires space to feed out the line and hook; this would create a dangerous workspace. Sport fishing interests harvest hundreds of coho in Mist Cove because there is plenty of opportunity and area to fish. The closed SHA and the area open to sport, commercial troll and cost recovery harvest contains industrial net pens, seine harvest boats, tenders, sport fishing boats, sport charter operators, and work skiffs. Although remote, this is not some stream out of *A River Runs Through It*, by Norman Maclean with the solitude of one person fly-fishing and casting to the beat of geologic time. Mist Cove is a busy area with coho returns of 100,000+ where cost recovery operations occur several times per week, commercial trollers harvest in and outside of the bay and NSRAA conducts its saltwater operations. There may be places to create an exception for fly-fishing, but the Mist Cove SHA and work area is definitely not that place. We welcome sport fishing and sport charter fishing in the open area and staff is accommodating to visitors and clients of sport charter operations.





Mist Cove SHA, consisting of all waters of Mist Cove west of a line from  $56^{\circ}31.70'N$  lat,  $134^{\circ}39.97'W$  long to  $56^{\circ}31.27'N$  lat,  $134^{\circ}39.85'W$  long. Waters closed to common property fishing within the Mist Cove SHA are south of a line from  $56^{\circ}31.07'N$  lat,  $134^{\circ}40.20'W$  long to  $56^{\circ}31.07'N$  lat,  $134^{\circ}40.12'W$  long.

I am happy to serve on committees with regard to these proposals if the board deems committee work necessary. I appreciate your time and consideration of my comments.

Sincerely,

Steve Reifensstuhl

General Manager, NSRAA

Page 5 | NSRAA Public Comments to BOF January





CONCERNING MASS MARKING OF CHINOOK AND MARK-SELECTIVE  
FISHERIES CONDUCTED IN SOUTHEAST ALASKA

**Whereas**, the NSRAA Board is concerned that mark-selective fisheries have been conducted in the waters of the State and have been developed without the approval of the Alaska's legislatively-mandated process for fishery regulation under the State Board



of Fisheries process<sup>3</sup>; and,

**Whereas**, acceptance of mark-selective fisheries for implementation in Alaska outside of the Alaska State Board of Fisheries regulatory authority is inconsistent with the Pacific Salmon Treaty 2009 Agreement and the bilaterally negotiated understanding that, "The Pacific Salmon Commission develops catch limits and related provisions to present to the two governments. These recommendations, which become effective upon approval by both governments, are then implemented by each countries domestic management authority.<sup>4</sup> "; and,

**Whereas**, mass marking of Chinook and mark-selective fisheries in Washington State and British Columbia are within their purview, are independent of the Alaska regulatory process, and if adopted bilaterally by the Pacific Salmon Commission, funding should be provided by the United States Department of State in consultation with the Canadian government and US funding authorities; and,

**Whereas**, the NSRAA Board believes it is inappropriate to be lobbying for Federal funding from the Alaska Congressional delegation for a program that would have direct impacts on the Association operations and on fisheries without having engaged the Association in a dialogue and public process, and is concerned that Alaskan fishing industry acceptance and support for these programs are being misrepresented.

**Now therefore be it resolved**, the NSRAA Board of Directors is not in support of mass marking and mark-selective fisheries in southeast Alaska fisheries at this time, in light of the stated concerns and unanswered questions.

**Passed, Approved and Adopted** by the NSRAA Board of Directors on this 16<sup>th</sup> day of November 2017.

Kevin McDougall, President NSRAA Board of Directors

---

Steve Reifenstuhl, NSRAA General Manager



IN REPLY REFER TO:

## United States Department of the Interior

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

OSM 17111.GP

DEC 27 2017

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

Dear Chairman Jensen:

The Alaska Board of Fisheries will consider 153 proposals, among other issues, at its Southeast Alaska and Yakutat area on January 11-23, 2018 meeting in Sitka, Alaska.

The Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and has included the enclosed Federal staff comments for proposals which may result in impacts to Federal subsistence users or fisheries. During the meeting, we may wish to comment on other agenda items if issues arise that may have an impact on Federal subsistence users or fisheries.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Eugene R. Peltola Jr.  
Assistant Regional Director

Enclosure



Chairman Jensen

2

CC: Anthony Christianson, Chair, Federal Subsistence Board  
Thomas Doolittle, Deputy Assistant Regional Director, Office of Subsistence Management  
Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management  
Stewart Cogswell, Fisheries Division Supervisor, Office of Subsistence Management  
Pippa Kenner, Acting Anthropology Division Supervisor, Office of Subsistence Management  
DeAnna Perry, Subsistence Council Coordinator, United States Forest Service.  
Sam Cotten, Commissioner, Alaska Department of Fish and Game  
Glenn Haight, Executive Director, Alaska Department of Fish and Game  
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game  
Lisa Olson, Division Operations Manager, Alaska Department of Fish and Game  
Hazel Nelson, Subsistence Division Director, Alaska Department of Fish and Game  
Scott Kelley, Commercial Fisheries Division Director, Alaska Department of Fish and Game  
Thomas Brookover, Sport Fish Division Director, Alaska Department of Fish and Game  
Tom Taube, Division Operations Manager, Alaska Department of Fish and Game  
Forrest Bowers, Division Operations Manager, Alaska Department of Fish and Game  
Chair, Southeast Subsistence Regional Advisory Council  
Interagency Staff Committee  
Administrative Record



**OFFICE OF SUBSISTENCE MANAGEMENT COMMENTS ON  
ALASKA BOARD OF FISHERIES PROPOSALS  
FOR THE  
SOUTHEAST AND YAKUTAT FINFISH  
MANAGEMENT AREAS**

**State of Alaska  
Board of Fisheries Meeting  
Sitka, Alaska**

**January 11-23, 2018**



**PROPOSALS 104, 105, and 106** seek to modify the waters closed to commercial herring fishing in District 13 of Southeastern Alaska known as the “core area”. Proposal 104 requests repealing certain closed waters provisions in District 13 effectively liberalizing/expanding the area available to commercially fish. Proposal 105 and 106 request expansion of the area closed to commercial herring fishing in District 13 effectively restricting commercial herring fishing to areas outside of the proposed expanded “core area”. The three proposals were grouped because each addresses modifying the boundaries of the “core area” in District 13 which include or are adjacent to waters under Federal subsistence fisheries jurisdiction.

#### **Current State Regulation:**

#### **5 AAC 27.150. Waters closed to herring fishing in Southeastern Alaska Area Herring may not be taken in:**

*(7) District 13, in the waters north and west of the Eliason Harbor breakwater and Makhnati Island Causeway from the westernmost tip of Makhnati Island to the easternmost point on Bieli Rock to the southernmost tip of Gagarin Island to a point on the eastern shore of Crow Island at 57 06.43' N. lat., 135 28.27' W. long. to a point on the western shore of Middle Island at 57 06.41' N. lat., 135 28.11' W. long. to a point on the southeastern shore of Middle Island at 57 05.56' N. lat., 135 26.23' W. long. to the green navigation marker northeast of Kasiana Island, to the Baranof Island shore at 57 05.26' N. lat., 135 22.95' W. long.*

#### **Current Federal Regulation:**

#### **36 CFR 242 and 50 CFR 100**

*(e)(13)(xxi) The Federal public waters in the Makhnati Island area, as defined in §100.3(b)(5) are closed to the harvest of herring and herring spawn except by Federally qualified users.*

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

**Impact to Federal subsistence users/fisheries:** Unknown. Adoption of any of the three proposals may impact harvest success rates of Federally qualified users fishing in waters under Federal subsistence fisheries jurisdiction surrounding Makhnati Island or within the different proposed core areas. It is difficult to determine the impacts that adopting the different proposals may have on Federally qualified users fishing or gathering herring roe in the identified areas because of the mobility of the herring schools within Sitka Sound leads to the unpredictability of where the schools will mill or spawn.

**Federal position/recommended action:** Neutral. These three proposals are likely allocative in nature between user groups participating in fisheries outside of waters under Federal subsistence fisheries jurisdiction. The Federal Subsistence Management Program has provided these comments to ensure the Board of Fisheries has the most current Federal regulations and understands the Federal public waters around Makhnati Island are currently limited to herring fishing and herring spawn fishing to Federally qualified users.



**PROPOSAL 187** seeks to re-open the personal use salmon fishery in the Klawock River on Prince of Wales Island. The proponent requests the reauthorization of the use of “subsistence beach seines” be restored in the area between the Craig-Klawock Highway Bridge and the Klawock River.

**Current State Regulation:**

**5 AAC 77.682. Personal use salmon fishery.**

- (i) The following waters are closed to the personal use taking of salmon:*
  - (3) the Klawock River drainage upstream of the Klawock River Bridge.*

**5 AAC 01.710. Fishing seasons**

- (e) From July 7 through August 7, sockeye salmon may be taken in the waters of Klawock Inlet enclosed by a line from Klawock Light to the Klawock Oil Dock, the Klawock River, and Klawock Lake only from 8:00 a.m. Monday until 5:00 p.m. Friday.*

**5 AAC 01.725. Waters closed to subsistence fishing**

- (a) The following waters are closed to the subsistence taking of salmon:*
  - (a) Salmon may not be taken for subsistence purposes in*
    - (1) the Klawock River drainage upstream of the Klawock River Bridge;*

**Current Federal Regulation:**

**36 CFR 242.27 and 50 CFR 100.27**

- (e)(13)(xx) The Klawock River drainage is closed to the use of seines and gillnets during July and August.*

Additionally, the area addressed by this proposal borders but is not within Federal subsistence fisheries jurisdiction.

**Is a similar issue being addressed by the Federal Subsistence Board?** No. This fishery was restricted by both the Alaska Board of Fisheries and the Federal Subsistence Board (via proposal FP15-15 submitted by the Southeast Alaska Regional Subsistence Advisory Council) during the winter 2014/2015 regulatory meetings season.

**Impact to Federal subsistence users/fisheries:** Yes. Adoption of this proposal may lead to potential overharvest of Klawock River bound Sockeye Salmon within the area of concern. Sockeye Salmon are harvested by Federally qualified subsistence users in the Klawock River and Lake generally upstream of the waters addressed by this proposal, which are under Federal subsistence fisheries jurisdiction. Due to the close proximity of the area addressed by this





proposal and the Federal subsistence fishery, both fisheries target the same Sockeye Salmon stock which are likely milling and displaying terminally spawning system fidelity.

Klawock Sockeye Salmon weir counts have been declining in recent years. The Prince of Wales Hatchery Association (POWHA) maintains an aluminum bipod weir on the Klawock River just below the lake. From 2001-2011, weir operation began in early July to specifically count sockeye. Weir counts of Klawock Sockeye Salmon during the 1930's averaged just over 35,000 fish. During the period of 2000 through 2010, weir counts ranged from 6,198 to 22,739 Sockeye Salmon. Since 2011, weir counts have been less than 5,000 Sockeye Salmon.

Prior to 2006, the only Sockeye Salmon harvest reported on Federal subsistence fishing permits from the Klawock Lake/River drainage was seven incidentally taken during the Federal subsistence Coho Salmon fishery. Since 2006, directed harvest of Sockeye Salmon has been reported on Federal permits. Harvests reported from 2006-2016 have ranged from 9 to 301 Sockeye Salmon, with dip net, gillnet, seine and hand line gear being used. Seine and gillnets have comprised 78 percent of the total harvest reported on Federal permits (Forest Service 2017).

**Federal position/recommended action:** Oppose. Adoption of this proposal may lead to over exploitation of the Klawock River Sockeye Salmon stock, resulting in both conservation concerns and challenges to the continuance of subsistence uses. Adoption of this proposal could have the opposite effect on the Sockeye Salmon stock both the Federal Subsistence Board and Board of Fisheries took recent regulatory action to protect.



**Patricia Roberts Alexander**  
**P.O. Box 1284**  
**Sitka, Alaska 99835**  
**907-752-0487**  
**pata6088@gmail.com**

December 20, 2017

To the 2018 Board of Fish.

My name is Patricia Roberts Alexander. I lived in Sitka in the 1950's and live here now. I eat herring eggs! I am the daughter of a Klawock commercial fisherman. I am also a member of the Sitka Tribe of Alaska's Cultural, Customary and Traditional Committee (CC&T). I am also a lifetime member of the Alaska Native Sisterhood. I thank the Sitka Fish and Game Advisory Committee and the Board of Fish for their work on these issues.

Thank you for increasing the ANS and the threshold. I also wish to thank the Board of Fish for establishing the subsistence zone for herring.

I am concerned about the formulas used for the biomass assessment is often wrong sometimes 47% wrong, as in 2012, when only 53% of the forecasted biomass showed up on the spawning grounds. We must work together using science and traditional knowledge to devise a formula that is correct. It seems impossible to be nimble and manage the resource in season. There is no measurement of poor quality spawn. In 1985 the herring spawned for one month and was two inches thick according to a long time member of the STA Herring Committee, Mr. John Duncan. We cannot say how ocean acidification and climate change are affecting the herring resource and others. There was no kelp with eggs in Sitka Sound this year. Sitka gardeners no longer can find kelp for their gardens in Sitka Sound and one came to testify to the CCT Committee. I can remember thick spawn in Sitka Sound, north and south and in Juneau where the Alaska Marine Highway docks. The south part of the Sitka Sound no longer has herring spawn. Neither does Auk Bay.

I heard in a Sitka Fish and Game Advisory Board meeting that last year there were 130 whales when there were only 30 the year before. This must be factored into the formula for determining the biomass and amounts to be harvested. Herring should be recognized as a forage fish in Alaska State regulations. Loss of this essential herring fishery will negatively affect every fishery. Herring comprise 60% of king salmon diet, and 50% for halibut. This is for all the marbles. Look at where it is not managed properly elsewhere. The herring did not come back. Sitka Sound is the last stock of herring. We must be conservative in the management of this resource! We do not want our children to have to go a museum to see herring like in Iceland.

Subsistence is less than 7% of the sac roe harvest. It must be protected as essential nutritional indigenous food for indigenous people. The Alaska State Constitution AS 16.05.258(b) says provision of subsistence first before the resources are used for any other resource. I believe the herring fishery is too long. It used to be two days and is now two weeks.



It is time to cut the days of harvest by half to preserve the resource. I did not share my herring eggs on branches this year except with one sister. I have a lot more relatives that did not get any this year.

Proposal 94 – Strongly oppose  
Reduce subsistence herring amounts

Proposal 99 – Support  
Reduce herring roe harvest rate  
It is very important for the Board of Fish to take a step toward conservation. Harvesting less herring and eggs will cause hardship on Native people. It is an essential part of our lifestyle from traditional parties, special occasions and ceremonies. The Alaska State Constitution says to provide for subsistence first before it is used for any other resource.

Proposal 104 – Strongly oppose  
Repeal closed herring waters  
The small bays are nurseries for the smaller herring. It will result in greater survival rate.

Proposal 105 – Strongly support  
Expand closed waters to herring commercial fishing

Proposal 106 – Strongly Support  
Expand closed waters to commercial herring fishing

Proposal 107 – Oppose

Thank you for the opportunity to give testimony and for your work. Please carefully consider the oral and written testimony of those with traditional knowledge of the herring and other resources.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Roberts Alexander".

Patricia Roberts Alexander



Submitted By  
Patricia Lee Dick  
Submitted On  
12/28/2017 9:05:53 PM  
Affiliation  
NA

NONE of the proposals are acceptable because global climate change is a GAME CHANGER. It is not an "I'm gonna have to come up with a revised MODEL" or "we are have to change where we dip the net" or a "we are going to have to reduce the amount taken." It is adapt to the change in climate or fail.

The ocean has warmed on average 2 degrees Celsius and 2 degrees Celsius is warmer than 2 degrees Fahrenheit. Think about your own capacity for surviving an increase in body temperature. Would you survive with a temperature of almost 101 instead of 98.6? Think about how you feel at the higher temperature. In the enormous "blobs" of warm water that we have had in the past in the Pacific, the temperature is even higher. No doubt about it, from the Fisheries Report many types of fish populations are being affected. You as fish managers are burdened with the job of saving fish populations in an extremely rapid changing environment. You owe it to yourself to watch "Chasing Coral" because it illustrates how fast organisms can die off (a number of days) because of the speed of the environmental change that is occurring in the ocean. No one dealing with the keeping the Herring population from collapsing, should do so without reading the Herring Synthesis. Here's the link: [http://herringsynthesis.research.pdx.edu/final\\_docs/HerringSynthesisFINAL102710.pdf](http://herringsynthesis.research.pdx.edu/final_docs/HerringSynthesisFINAL102710.pdf) Managers and advisory committee members need to understand history before they jump on this "climate changing locomotive" and make decisions on preventing the impending collapse of the Sitka Herring Fishery.

If this is not enough of worry, consider what the extreme ocean temperature is doing to the plankton. They are getting hit not only from uninhabitable temperatures but also extreme northern water ocean acidification. Which shell is going to melt first, the shell of a crustacean zooplankton copepod or a clam? The plankton don't have the ability to dive when the water gets too warm like the herring do. They have to live in the photic zone. Since herring, salmon, and so many creatures depend on plankton to live, there has to be a slowdown of destruction in whatever way we can make it happen in this very fragile ocean ecosystem.

We need to listen to the Native people who have been telling you from day one to shut this herring fishery down! I know men who spent their entire lives attending one herring meeting after another explaining how important forage fish are to this marine ecosystem to no avail. Elders have told you that it is a keystone species and to kill the whole fish BEFORE it has laid it's eggs is WRONG! Everyone knows that is wrong. Aesop knew it over 2,600 years ago when he wrote the fable of the goose that laid the golden eggs. More recently, the Lingit have a special herring story, ceremony, sacred rock, and haunting herring song. All to a tiny fish that is an important part of the foundation of the Sitka Sound (and Gulf of Alaska) ecosystem. The Haida stopped a herring fishery by asserting their sovereign rights.

The system of fisheries advisory boards is rigged in favor of the commercial gear types, with only one seat allocated for subsistence. Thus, it is futile to attempt to save the herring via this system. The only viable route to save the herring (forage species) that form the foundation of almost all SE Alaska fisheries is to litigate. SE Alaska Natives need to follow the example of the indigeneous Canadian Natives in Bella Bella who stopped the destructive practices destroying their fishery and to assert their sovereignty in international courts.

The local Native people have contributed their herring data for man years but somehow their traditional knowledge is considered to be inferior to a biology degree and a position at ADF&G? Please note that the current fisheries in SE Alaska are a mere shadow of the abundance and diversity that euro-american colonists witnessed on their arrival.

I suggest the State of Alaska begin a co-operative process of sharing management (sovereign to sovereign) to manage fisheries, especially forage fish species. Sitka Tribe has developed a top notch Natural Resource Protection arm that is compiling their own research-based data on everything from local plankton populations, fisheries, and a wide variety of natural resources. I imagine STA might be going to follow your protocol and pick proposal #99 from your list of supposedly best 8 herring proposals. But I don't believe in the process, I don't think it is fair and I hope STA chooses to oppose any alternative that is **anything short of closing down the commercial herring fishery**. STA needs to marshal support in this community to seek other alternatives in it's fight to save the herring foundation of most SE Alaska fisheries. There is help out there for tribes to exert their sovereignty. I listed just a few at the end of this comment.

But first, I am writing this comment. I am hoping that you reject ALL these proposals and base your decision on scientific method rather than the political pressure from the wealthy herring sac roe permit holders. SE Alaska herring need a chance to survive in this constant game changing ocean. We can no longer live waste our resources by utilizing old solutions to the new problems faced with global climate change.

I would like to point out that ADF&G research is not the only research that is being done on Herring. The Sitka Conservation Society brought in a herring researcher from the Pacific Northwest last year and he had an enormous amount of data of DNA in herring stocks around Puget Sound and up to Alaska. And it all pointed to the collapse of herring populations due to over fishing and wiping out whole DNA strains. There is so much riding on your shoulders, too much really. If I were you, I would listen to the people who have a personal relationship with the herring. Listen to the herring song!

Sincerely,

Patricia Dick

Sooktushaa (adopted Kiks.adi)



Native Americans need the protection of the court otherwise they are left with broken promises or they are left with their hat in their hand in unfair commercial interest committees that ignore their interests.

Help for Alaska tribes to assert their sovereignty:

Alaska Law Help is a legal firm that deals with fishing and hunting rights, here's the link.

<https://alaskalawhelp.org/issues/native-american-issues>

The National Congress of American Indians specializes in Native fishing and hunting rights

<http://www.ncai.org/resources/resolutions/federal-recognition-of-alaska-native-hunting-and-fishing-rights>

The Sea Shepherd Justice is a wonderful organization that secures justice for the sea.

<https://seashepherdlegal.org/?>

[gclid=Cj0KCQiAyNjRBRCpARIsAPDBnn3BPgSzorbHTANK\\_sn9MSG18GB3GhDariw4jHQsXhDffmNUrFDxKG4aAmUyEALw\\_wcB](https://seashepherdlegal.org/?gclid=Cj0KCQiAyNjRBRCpARIsAPDBnn3BPgSzorbHTANK_sn9MSG18GB3GhDariw4jHQsXhDffmNUrFDxKG4aAmUyEALw_wcB)



**From:** bookey  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Rock fish release  
**Date:** Thursday, December 14, 2017 3:57:33 PM

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Board members,

I have no problem with the proposal for "All" vessels to have a deep water release device on board while fishing, as long as this regulation requires commercial fishing vessels to use the same device. I see orange on the water behind almost every long liner fishing in and near Prince William Sound. By catch or not we must protect the species. Every vessel must be required to use such a device.

Patrick M. Bookey  
Luck of the Irish Charters  
Box 55194  
North Pole, Alaska 99705  
907 378 6688

Sent from my iPhone



Submitted By  
Paul Menish  
Submitted On  
12/19/2017 9:06:21 AM  
Affiliation  
Permit holder  
  
Phone  
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[paulmenish@gmail.com](mailto:paulmenish@gmail.com)  
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To the board, my name is Paul Menish I currently own a 300 pot s.e. Alaska Dungeness crab permit. I am sending this e mail in support of proposal 253. Thank you



Submitted By  
Paul Reinsch  
Submitted On  
12/27/2017 4:43:59 PM  
Affiliation

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Four of us fished the Tsiu in 2013, 5 days in mid sept. We were told that the commerical fishermen

only fished 3 days out of the week, and the other days were for sport fishermen. There not being anyone there to inforce the rules, they ran thier nets every day we were there. They used jet boats to heard the fish into the gill nets. DC3 would land and take off most of the day. Not a good experience. Did we catch fish, Yes, did we have fun, Yes would it have been much better with out the commerical fishing the way it was. HELL YES. There needs to be more room for the sport fishermen, without having to put up with having a good spot spoiled when a jet boat goes thru hearing the fish. The nets at that time were set on each side of the river may be 50 yards or more aspart , not all the way across, but they might as well have been. Fish had to zig zag to get thru the nets. At that time it is a small wonder that enough fish made it to spawn, for future runs. Please do something to make it better. I have been incontact with the lodges, and when it is we will return. We are fly fishermen, catch and release unless the fish was caught in the gills, then we kept it. 4 fishermen 5 days, less that 15 fish we kept and brought home. barbless hooks.

Paul





Submitted By  
Peter Bradley  
Submitted On  
12/28/2017 5:58:09 PM  
Affiliation

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I am writing today because I would like to see herring thrive. I encourage the board of fish to adopt proposal 98 (or 99), in addition to proposals 105 and 106 - which I believe will lead to greater economic, cultural, and environmental health in the long term - and to reject proposals 94 and 104, which will reduce the availability of a subsistence lifestyle.

Further, I am writing in hopes that board members will consult [Herring Synthesis](#) by Tom Thornton, Madonna Moss, Fritz Funk, et al., as deliberations proceed.

A few years ago, The North Pacific Research Board commissioned a substantial research project spearheaded by Tom Thornton. The project methodology was designed to create a synthesis of historical data, archaeological evidence, and Local and Traditional Knowledge (LTK). I'd like to share some of what I've learned from Herring Synthesis, as it clearly demonstrates that we are managing herring at a depleted status caused by over-exploitation in the past. The carefully researched document leads me to the conclusion that we should avoid fishing practices that are highly likely to interfere directly with the recovery of herring populations in Southeast Alaska.

I will start by describing some of the basic findings of herring synthesis about historic cultural importance of the fish, best summarized by the following excerpt from p.50 of *Herring Synthesis*:

Overall, Pacific herring can be considered "cultural keystone species" among Southeast Natives, according to criteria outlined by Garibaldi and Turner (2004), including its: 1) intensity, cultivation, and multiplicity of use, 2) rich linguistic and 3) cultural associations, 4) persistence in memory and use despite cultural change, 5) unique and irreplaceable role in socioecological system, and 6) value in providing opportunities for resource acquisition beyond the home territory (e.g., through exchange).

It is in the context of this traditional use and importance across Southeast Alaska that herring management should be conducted. As such, it would be inappropriate to adopt proposals 94 and 104, which will further reduce the availability of subsistence lifestyle in Sitka and Southeast Alaska. It is clear that the availability of herring for subsistence use is not what it used to be - it takes more time, requires greater distance travelled, requires greater expense and access to technology/transportation, and has a higher likelihood of failure. Those are not traits that bode well for subsistence use. *Herring Synthesis* features 270 pages (p.296-595) of LTK observations from across Southeast Alaska; most of those observations are recollections of drastic reductions in herring populations across Southeast Alaska in the last several decades. The board of fish is responsible for protecting the subsistence availability of herring and herring roe, and the adoption of proposals 94 and 104 will interfere with that.

Proposals 105 and 106, on the other hand, offer important protections for subsistence use of herring, expanding the protected area near Sitka to include areas of importance for the survival of young herring and areas closer to the road system, which in some years will provide much easier access for the roe-on-branch practice.

In the conclusions to *Herring Synthesis*, Thornton points out that:

As a critical prey species in a complex marine food web, herring are both resilient and adaptive, and thus have avoided extirpation. Herring populations have shown the ability to recover and repopulate areas where they have been overfished or temporarily abandoned due to habitat stress. But it is important to get the management right at the ecosystem level, not just the commercial exploitation level, because herring are a key foundation species for the North Pacific food web, and rebuilding depleted stocks is difficult with or without LTK. In addition to putting in place a set of short, medium, and long-term ecosystem goals to encompass herring management, it is important to communicate effectively and bring local leaders together who are willing to consider the full spectrum of views and uses of herring and manage the species appropriately to meet critical marine ecosystem conservation goals. Local and Traditional Knowledge

bearers are critical contributors to this mission, as well as key sources of data, often possessing the earliest and widest range of knowledge available for particular herring schools and habitats. Their knowledge should not be dismissed simply because it is not compatible with current management models.



In accordance with that statement, it seems prudent to reduce the burden of the purse seine sac-rope herring fishery in Southeast Alaska by adopting proposal 98 (or 99), offering a greater opportunity for an eventual rebound to historic levels of herring.

With all of that said, I would like to close on a personal note.

Earlier this year, I happened to be in Farragut Bay off Frederick Sound while herring were in the bay. I've never been in a place that felt so alive - seabirds of all stripes, whales, and sea lions, all gorging on herring in full-fledged ecosystem rhapsody. I had the same feeling recently, watching mobs of humpbacks and seabirds feast on juvenile herring near town in Sitka. The fact that herring draw together birds and salmon and whales wherever they go leave me with what feels like an easy conclusion: it is a mistake to pull these forage fish out of the ocean so their roe can be sent to market overseas and their remains (a huge percentage of the total harvested mass) to fish farms down south.

It seems to me that the economic and ecological benefits of leaving herring alone would vastly outweigh the benefits of fishing them. It also seems to me that we probably still don't understand the oceans well enough to be sure that what we're doing now won't be regretted later. As such, I agree with the people who, in reference to traditional knowledge, personal observation, and historic and scientific research, have urged heightened caution in the management of the herring fishery.

Interested in hearing those perspectives, I recently went back to the tapes of the Board of Fish meetings from 20 years ago. I have extracted and labeled the many testimonies delivered by scientists, tribal elders, and subsistence users in their attempts to inspire management strategies more focused on healthy ecosystems, subsistence use, and less wasteful harvest.

I'm excited to share the audio with you - you can access it at <http://herring.rock>. The amount of knowledge and experience shared in these testimonies is vast and compelling, and I encourage readers to give them a listen. The elders who gave testimony back in 1997 watched herring populations dwindle across Southeast in recent decades, and learned about healthy ecosystems from their own grandparents, who may have lived to see the first reduction plants installed in the late 1800s. These beautiful testimonies are delivered not out of self-interest or greed, but in the shared interest of everybody living in Southeast Alaska, and in recognition of a shifting baseline for herring.



Submitted By  
Peter  
Submitted On  
12/14/2017 5:20:24 PM  
Affiliation  
Tlingit

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~~Dear Board of Fisheries,

My name is Peter John Karras Jr. born and raised my uncle Mark Jacobs Jr. My father Peter J.Karras Sr. he arrived in Sitka, Alaska during the late 1940's when the herring spawn was from Salsbury Sound to Redoubt.

The Herring Sac Roe fishery has a long and contentious history. Since the tribal community starting writing resolutions to stop the herring fishery in lower Chatham decades ago, subsistence users have been given excuses for one reason the commercial fishery must happen or another. But every conscientious examination of the issue shows that conservation and subsistence use must take precedence over a commercial sac-ro-e fishery.

Everyone wants a piece of the pie, but the rule of law says that whoever had the pie first should keep it. When it comes to herring, the Tlingit people have had a relationship with herring since time immemorial, herring is their pie to share, and for decades the tribal community in Sitka has demanded more conservation of the herring.

The fundamentals of conservation dictate that we should err on the side of caution when it comes to managing populations. Herring fisheries up and down the Pacific Northwest Coast have collapsed, and the Sitka Sound population the last sizable population. The fundamentals of fishery management dictate that we manage this last viable population conservatively.

Herring play a fundamental role in the marine ecosystems that support all of Alaska's fisheries. Yet the sac-ro-e fishery is extremely wasteful. Subsistence users have always known, and Alaskan statute dictates, that wasteful harvest is unethical. Yet the sac-ro-e fishery is mostly waste. It's like killing herds of deer but only harvesting the livers. Everything but the roe is ground up into fish meal for fertilizer or worse, to feed farmed fish, including BC salmon farms. Common sense would dictate that these herring are more valuable feeding endangered wild Alaskan salmon than supporting the threat of farmed salmon.

I am in favor of total stopping of fishing, gathering, netting, roe harvesting, herring eggs on branches, kelp, ect, ect. until the herring is able to recover to past numbers. This may take 2 years, 5 years, 10 years. Because when herring are doing good, we (people) are doing good.

I believe that if children 5 to 10 years old were allowed to decide what to do and were giving ALL the information. They would decide on allow the herring to recover. Look at East Coast, Southern West Coast (Washington, Oregon, California). FISHED OUT!!!

Bring people in from communities the went through what they and their community went through after waters near and around their community were FISHED OUT!!!

I wish I could type faster I have more to say.... I plan to be in attendance.

For these reasons, based on traditional knowledge that stretches back thousands of years longer than ADF&G's limited data, based on decades of testimony from Sitkans of every race, I urge the board to support Proposal 99, to cap the sac-ro-e fishery at 10% of biomass.

Sincerely,

Peter Karras Jr



Submitted By  
peter roddy  
Submitted On  
12/27/2017 1:15:43 PM  
Affiliation

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Sitka, Alaska 99835

I wholeheartedly support the Department of Fish and Game proposal eliminating the Southeast Dungeness Crab Management plan. This misbegotten unscientific monstrosity has been wildly inaccurate from it's inception. Twice its idiotic algorithms have shortened the season, most recently doing horrible damage to the fleet, the processing sector, and consumers: harvesters lost income as did processors and their employees, and our markets lost faith in us a reliable suppliers . Drive a stake into the heart of this monstrosity. Kill it dead.

December 28, 2017

Alaska Department of Fish and Game  
Board of Fisheries  
PO Box 115526  
Juneau, AK 99811  
Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Comments on Southeast Shellfish and Finfish Proposals January 11-23, 2018

Dear Chairman Jensen and Board of Fisheries Members,

Petersburg Vessel Owner's Association (PVOA) is composed of over 100 members participating in a wide variety of species and gear type fisheries in state and federally managed waters. An additional thirty businesses supportive to our industry are members. PVOA members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, crab, shrimp, sea cucumbers, and geoducks.

We appreciate the opportunity to provide these comments on the upcoming meeting. Due to the diversity of our membership, PVOA works hard to remain impartial on allocative proposals between commercial herring and salmon gear types. We do support the *Southeast Alaska Enhanced Salmon Allocation Management Plan* passed by the Board in 1994. You will find we took no position on salmon proposals that we felt would not help provide the fair and reasonable distribution of enhanced fish in the value allocations of (1) seine – 44 - 49 percent; (2) hand and power troll – 27 - 32 percent; (3) drift gillnet – 24 - 29 percent in accordance with the management plan.

#### **Proposal 53 – No Position**

*5AAC32.125(d)...At least one buoy on each Dungeness crab or ring net must be legibly marked with the permanent ADF&G vessel license plate number of the Dungeness crab vessel operating the gear. The buoy, or multiple buoys attached to a Dungeness crab pot or ring net, may not bear more than one vessel license number.*

*5AAC34.051 (a) At least one buoy on each king crab pot or ring net must be legibly marked with the permanent ADF&G vessel license plate number of the king crab vessel operating the gear. The buoy must bear only the number of the vessel used in operating the gear.*

*5AAC35.051 At least one buoy on each Tanner crab pot or ring net must be legibly marked with the permanent ADF&G vessel license plate number of the Tanner crab vessel operating the gear. The buoy must bear only the number of the vessel used in operating the gear.*

We are concerned this proposal could create potential for enforcement issues. Currently, all buoys attached to commercial fishing pot gear must display the ADF&G number of the vessel the gear corresponds to and it is not legal for a vessel owner to haul gear that has another vessel's ADF&G number. If a permit holder wanted to switch vessels midseason, as proposed, the buoy would have the wrong number when the permit holder switched vessels.

#### **Proposal 54 – Oppose**



PVOA members oppose a decrease in the Dungeness pot limit at this time and have done so each time similar proposals have been presented since 2006. While some fishing grounds have become more crowded due to the loss of once viable habitat to sea otters, not all grounds are overly saturated, especially in the fall season when fewer permits fish and more area is open.

Our membership believes the integrity of the tier system for Dungeness pot permits should be maintained and it is important to them that all permits be treated fairly if any increase or decrease in pot numbers were to occur.

### **Proposal 55 – No Position**

In 2016, there were 71 Dungeness permits that did not fish including two-300 pot, three-225 pot, 13-150 pot, and 53-75 pot permits.<sup>1</sup> It is likely that this maximum pot limit increase would utilize the permits that are currently latent and increase the number of pots in the water rather than decreasing them as intended.

This proposal could also create an issue for permit holders that are currently stacking two permits to meet the maximum 300-pot vessel limit. A partnership with two 150-pot permits would be reduced to 200 pots under this proposal, while a permit holder of a single 300-pot permit would not suffer any reduction.

### **Proposals 56, 57, 58, 82, 83, 84, 95, 96, 100, 105, 106, 167, 168 - Oppose**

PVOA opposes the various proposals seeking to close waters or repeal subsistence, personal use, or commercial fisheries. The above proposals lack sufficient explanation of a biological concern and unless there is a documented scientific need for conservation, we do not support limiting access to fisheries through area closures or repealing quotas and Guideline Harvest Levels (GHLs). PVOA has confidence in the Emergency Order authority given to the department to open and close fisheries in response to changes in abundance. And therefore see no need or reason to permanently close fisheries.

### **Proposal 59 – No Position**

We question the need and reasoning to permanently close this sport fishery that can be and has been closed annually by Emergency Order since 2005. When it comes to fisheries closures in general, we prefer the annual Emergency Order process to any permanent closure that makes reopening a fishery more complicated for users and the department in the future.

### **Proposal 60 - Oppose**

The Sitka Sound Special Use Area is intended to limit commercial and sport harvest and maintain access to personal use and subsistence harvest around Sitka. While this proposal seeks to release crab, it is asking for a commercial operation in a Special Use Area and we don't support this change.

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<sup>1</sup> Fishery Statistics: Earnings and Participation. State of Alaska, Commercial Fisheries Entry Commission.  
<https://www.cfec.state.ak.us/bit/MNUCRAB.htm>



### **Proposals 61, 62, 63, 65, 72, 74, 93, 104, 108 – Support**

We are supportive of these efforts to provide more access and opportunity for commercial fishermen by increasing areas or creating new fisheries.

### **Proposal 64 – Support**

Red king crab is an increasingly valuable resource and we are seeking a way to allow fishermen that have invested in the fishery to profit when the harvestable surplus is between 50,000 and 200,000 pounds of legal male crab. The minimum threshold to prosecute the fishery was lowered from 300,000 in 2002 on the request of fishermen and processors in response to rising prices. These prices have continued to increase and we are seeking a solution to allow commercial fishermen and the State to profit off this resource in years with abundance of less than 200,000 pounds of harvestable surplus. Just 50,000 pounds of harvestable surplus is worth \$500,000 or more in ex-vessel value to fishermen.

We know the department is concerned that Guideline Harvest Levels (GHLs) could be exceeded in specific areas under this management policy; this is a concern of ours also. We are not looking to use this proposal to shift allocation away from personal use fishermen.

We believe it is possible for the fleet and department to work together to accomplish this Equal Quota share fishery. It is likely that two or more permit holders would fish the same vessel and 20-pot limit. This would make the fishery more economical for the fishermen and relieve some of the department's management concerns, as it will be easier to target area specific GHLs and close areas as the harvestable surplus is caught with less vessels participating in years of lower surplus.

The Equal Quota Share system would also give more time for permit holders to catch their share. All 59 permits would not be forced to fish at once. The ability to fish their red king crab Equal Quota Shares around other fall fisheries would decrease the amount of vessels participating in the fishery at a given time and furthermore ease management of area specific GHLs.

If you compare the catch data of the Golden King crab fishery in Southeast Alaska, you'd find that 76,829 and 61,586 pounds were harvested in the 2015/2016 and 2016/2017 seasons respectively, and there are 48 permits eligible to fish GKC<sup>2</sup>. This fishery is currently managed for area specific GHLs. We are asking for a similar harvest or higher, depending on abundance, for 56 eligible permits, under conditions that will likely reduce the number of vessels fishing at a time.

If necessary, we are supportive of trying alternative management solutions to make this fishery work as an Equal Quota Share system. Alternatives could include, but are not limited to:

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<sup>2</sup> Stratman, J., T. Bergmann, K. Wood, and A. Messmer. 2017. Annual management report for the 2016/2017 Southeast Alaska/Yakutat golden king crab fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 17-57, Anchorage.





- A bay-by-bay Quota Share limit for each permit holder
- The board could decide the number of permits that each bay can sustain annually and the permit holders that register to fish could randomly be assigned a bay to ensure there isn't too much effort in any specific area. A survey-based metric could also be added to help identify the appropriate number of permits to fish each bay on a year-by-year basis.
- In years of lower abundance, Equal Quota Share harvest could be limited to non-surveyed areas.

We understand there are concerns and negative trade offs to this management style, namely fleet consolidation. However, under this alteration to the management plan between \$500,000 and \$2 million in ex-vessel value of crab will be harvested that would otherwise be forgone revenue. We added a sunset of one Board cycle to address these concerns and allow the Board to evaluate the costs/benefits of the program after a trial period.

#### **Proposal 66 – Support**

As you are aware, in 2016, the Golden King crab fishery in Lower Chatham was closed before the GHL had been met while there was only one participant in the fishery and a storm. When the only participant asked for an extension due to weather, he was denied. This is a serious safety issue and we support this precautionary measure.

#### **Proposal 67 – Oppose**

There are usually three vessels, all represented by PVOA, fishing Golden King crab in the fall months. We don't understand the cited need for three months to review fishery data from so few participants, or the need to match Aleutian Islands management, with the current mandatory logbook and daily call-in criteria. The department is receiving real-time catch data.

#### **Proposal 68 – Support**

The industry submitted this proposal as a way to structure the GKC management plan to ensure that all areas open for at least a brief fishery each year. In 2016 and 2017 the department and industry held last minute Task Force meetings in January and fishermen were faced with the possibility of pre-season area closures in East Central and the Northern Area. This proposal will allow better stability in the fishery for participants and help manage their expectations to help them plan for the fishery, or decide to participate in another fishery.

We all know there is no legislative money available for surveys, the Gold King Crab Observer program was a part of the ADF&G budget cuts in 2015, and it is unclear what the parameter would be for an area to re-open if it is closed pre-season. Opening the fishery in all areas, even for a limited time, is the only option to find out what is in an area. Closing an area based only on the previous seasons catch rates is not sound management.

It is also important to note that this is solely a commercial fishery. Golden King crab are found at such great depths that substantial gear, buoy line, and hydraulic equipment is necessary to harvest them.

#### **Proposal 69 – Oppose**





PVOA does not support lowering the GHs as proposed based off the Maximum Sustainable Yield (MSY) data computed from harvest data from 2000-2017<sup>3</sup>. While this data captures the recent trend in the fishery, it excludes the highs in the fishery from the 1980's and the lows in the 1990's. Inclusion of these historic harvest trends, and not solely the last 18 years, in computations would result in more cognizant MSY data.

We also believe that lowering the upper end of the GHs ties the hands of managers as the GKC stock rebounds and want to retain the ability to catch King crab when they are available.

### **Proposal 70 – Oppose**

This proposal does not cite a biological reason to reduce the number of pots allowed in the fishery. We are especially concerned if this proposal were to pass in combination with Proposal 69, that would adjust the GHs for the GKC fishery based off of the last 18 years of catch using a 100-pot limit. The result would make the new GHs and reference MSY data incomparable to future GKC seasons.

A 20-pot reduction in this fishery would significantly change the fishery. Vessels don't currently haul their 100 pots daily. If the pot limit were reduced, however, a high percentage of the fleet would haul all 80 pots daily and soak times throughout the fishery would be greatly reduced. We expect this would make CPUE data from past seasons incomparable to CPUE data in future fisheries. Also, handling of crab would be increased, as undersized crab would have less time to filter out through escape mechanisms.

AML in Petersburg estimated over 230 new King crab pots were shipped to Petersburg in 2017. These cost up to \$1,000 a pot before the cost of buoy line, buoys, and shipping the pots and line from Washington to Petersburg. This isn't a full estimate of new gear purchased recently, as vessels often load their decks when they run North from Washington to help lower shipping costs of new gear and offset fuel costs for the traveling vessel. This pot reduction would be a significant loss in investment.

### **Proposal 71 – Support**

This proposal would make the regulations regarding sport, personal use, and subsistence fishing after de-registering from the commercial Tanner crab season more consistent with Dungeness and King crab regulations. It will also reduce the opportunity for enforcement issues.

### **Proposal 73 – No Position**

### **Proposal 75 – Oppose**

The shrimp Management Plan does not designate a personal use priority. In the future, if the department finds a harvestable surplus in Section 11-A, we would support re-opening the area to both commercial and personal use fisheries.

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<sup>3</sup> Palof, K., & Olson, A. (2017). *Golden king crab surplus production model analysis* (State of Alaska, Department of Fish and Game).

**Proposal 76 – Support**

Since this proposal would mirror the current regulation for legal shrimp pot gear in the commercial fishery, we do not expect any enforcement issue. The majority of shrimp pots used for sport fishing in Southeast are the same make used for the commercial fishery and readily available throughout Southeast.

**Proposal 77 – Support**

This is a housekeeping proposal since the sport Abalone fishery was closed in 2002.

**Proposal 78 – Support**

District 8 is separated by Mitkof Island and the shrimp stocks on the North and South end of Mitkof are closer linked to Fredrick Sound and Sumner Strait. We support dividing the district and adding the portions to District 10 and District 6.

However, we don't believe there is a need to lower the GHLS overall from 168,000 to 155,000. Shrimp stocks are cyclical and we don't want to limit the fleet's ability to harvest in times of high abundance. In times of lower abundance, the upper end of the GHL range cause no harm, as the fisheries in these districts are managed in-season based off survey and commercial CPUE.

**Proposal 79 – Oppose**

In order to implement this proposal, we expect the fishery would have to be closed for a season. It doesn't seem practical to allow a fishery in the fall and then again in the spring to make the switch to a spring only fishery.

**Proposals 80, 81 – Oppose**

This is an unequal reduction in pots between the 'small' and 'large' pot category that were determined to be equivalent by a previous Board. Fishermen using 'small' pots would lose 28.5% of their gear and fishermen using 'large' pots would lose 25% of their gear.

Requiring a fixed number of pots and distance between each pot would incur expense to all fishermen, except the proposer, who would have to re-configure their current groundline sets. Shrimp pot fishermen have been required to purchase new gear many times in the past as regulations have changed and we oppose these proposals that would incur more expense to them.

Limiting fishermen to one pull of each pot per day is not enforceable.

**Proposal 94 – Support**

We do not believe passing this proposal lowering the amount of herring roe 'Reasonably Available for Harvest' in regulation would reduce the amount of herring roe that is actually being harvested. And we are not supporting this proposal as a means to reduce subsistence use. We believe the subsistence harvest is lower than reported and ask for an ADF&G survey, perhaps similar to the sport fish salmon creel survey, to provide meaningful data.

**Proposal 97 – Oppose**



The winter food and bait Herring fishery provides bait for the Tanner and King crab fisheries that open sometime in the second week of February. Delaying this fishery until December would not provide sufficient time to catch Herring before the start of these crab fisheries.

### **Proposals 98, 99 – Oppose**

These proposals lack sufficient explanation of a biological concern or documented scientific need for conservation and would significantly harm fishermen and processors invested in the fishery.

The Sitka Sac Roe Herring fishery already has a conservation measure built in and historical returns show there is no need to provide more protection. In order for the fishery to occur, there must be an available spawning biomass above a 25,000 tons threshold. This threshold has increased from 6,000 in 1977 to 7,500 in 1983, to 20,000 in 1997, and 25,000 in 2009 as the biomass has increased.<sup>4</sup>

### **Proposals 101, 102, 103, 107 – No Position**

We represent a combination of Herring purse seine, gillnet, and roe-on-kelp fishermen and work hard to avoid allocation and gear conflicts within our membership.

### **Proposals 109, 110 – No Position**

A system similar to proposal 109 and 110 was tested in 2017, and fishermen found it to be a poor management tool. Groups have investments in gear together and it was hard to re-organize for the optimum number of permits per pen as determined by the department. In some cases, this included kicking people out of a group in order to form groups of 6.

We also question the legality of the proposals under the Limited Entry Act, as each proposal would allocate fish to a closed class of participants within the fishery.

In the herring roe-on-kelp fishery, the management tool used to control the amount of herring harvested is 'Blade Allocation' determined by the number of permits fishing in a pen and the abundance of herring. Pens with more permit holders are allocated more blades, the assumption being the more blades a pen holds, the more Herring will be taken to cover them with roe. Between one and four permits can fish in a pen.

Proposals 109 and 110 seek to reduce the number of pens in the fishery and therefore number of participating permits. In proposal 109, fishermen that have previously participated in the fishery with between one and three permits in a pen, would be prohibited from the fishery, unless they reorganize to form four-permit groups. It is easy to imagine circumstances under which this would bar some permit holders from the fishery.

In 2005 in the case *Grunert V State of Alaska*, the Supreme Court of Alaska found the Board's (Board of Fisheries) authorizing statute, AS 16.05.251(e), permits the board to allocate fishery

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<sup>4</sup> Hebert, K. 2017. 2018 Report to the Alaska Board of Fisheries: Southeast Alaska–Yakutat herring fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 17-58, Anchorage.



resources "among personal use, sport, guided sport, and commercial fisheries," but not "between" the fisheries. The Limited Entry Act defines "fishery" as "the commercial taking of a specific fishery resource in a specific administrative area with a specific type of gear."<sup>5</sup> Limiting the take of Herring only to pens with a certain number of permit holders could be argued to be allocating Herring to only these pens, and away from pens with less permit holders.

#### **Proposal 111 – Oppose**

We are concerned for the viability of Herring if they are placed in smaller pens. Members also oppose changing the current regulations for pens due to the expense of building them, increasingly restrictive management, and fears of being restricted down to the half pen.

#### **Proposal 112 – Oppose**

The proposed closure of the fishery to closed pen participants is not based upon a documented scientific need. The department already has a conservative mortality rate for herring in the roe-on-kelp fishery using closed pens even though the fish are released. This is 75% mortality.<sup>6</sup> Our members believe the actual rate is much lower, but accept the high mortality assumption because it creates a protection measure within the management of the fishery.

#### **Proposal 114 – Support**

The retention and sale of live sablefish is a current practice in California and Vancouver, Canada and we support Southeast fishermen having the opportunity to profit off this market also.

#### **Proposal 116 – Support**

Sport harvest of Sablefish has seen a rising trend from 6,705 fish in 2010 to 10,316 fish in 2016. Sablefish harvest outside of District 12 represents 65-71% of the total Southeast Sablefish harvest in 2015 and 2016 and 95% of harvest in the sport fishery is by non-residents.<sup>7</sup>

Many fisheries are facing more restrictive catch limits in 2018. IPHC will likely reduce the catch limit for Pacific halibut in 2C in 2018, increasing the pressure on other sport fish including Sablefish. Our membership would support a more conservative limit of 2 daily, 2 in possession, and 4 annual for nonresidents as well. We believe the limit should be consistent throughout Southeast Alaska, as proposed.

#### **Proposal 117 – Support**

The use of Sablefish pots is currently only legal in subsistence areas and our members support legalizing them for personal use areas also. It would make regulations simpler and more consistent

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<sup>5</sup> Michael GRUNERT, Appellant, v. STATE of Alaska and Chignik Seiners Association, Inc., Appellees.

<sup>6</sup> Hebert, K. 2017. 2018 Report to the Alaska Board of Fisheries: Southeast Alaska–Yakutat herring fisheries. Alaska Department of Fish and Game, Fishery Management Report No. 17-58, Anchorage.

<sup>7</sup> Chadwick, R. E., T. Tydingco, and P. Fowler. 2017. Overview of the sport fisheries for groundfish and shellfish in Southeast Alaska through 2017. Alaska Department of Fish and Game, Special Publication No. 17-16, Anchorage



throughout Southeast. Fredrick Sound, on the North end of Mitkof Island, is a personal use area for Sablefish and this would allow our residents to set pots closer to town.

### **Proposal 118 – Support**

Many longline fisheries throughout the State match opening dates with the Federal Pacific halibut and Sablefish fisheries. There are only 22 permits including hook-and-line and pot gear for this fishery and it would shorten their seasons to be able to fish their Southern Southeast Inside (SSEI) quota *on separate trips*, before or after their Federal trips. Rather than reloading their vessels with a baitshed and longline gear, or pot gear just to fish their SSEI permits under the current season. Currently, a few of our vessels load gear to fish Federal Sablefish in March, unload the gear to fish Sitka Sac Roe Herring in March/April, and then load their Sablefish gear a second time in June to fish their SSEI Sablefish quota. This proposal will simplify the timing of these fisheries and allow the SSEI Sablefish State fishery to evolve with the Federal Sablefish fishery.

### **Proposal 119 – Oppose**

This proposal caters to three pot permits currently allowed to fish in September. We would support longer season dates if the 19 hook-and-line and 3 pot permits were all incentivized equally.

### **Proposal 120 – Support**

CFEC made pot gear legal for the SSEI Sablefish C61C permits effective May 11, 2017. Currently, the SSEI sablefish fishery using *longline gear* opens 8:00 a.m. June 1 and closes at 12:00 noon August 15. The SSEI sablefish fishery using *pot gear* opens at 8:00 a.m. September 1 and closes at 12:00 noon November 15. Now that there are more than three permits eligible to fish pots, it is more cohesive to allow both gear types during one season.

We expect minimal gear conflicts from allowing one season for hook-and-line and pot gear due to the small amount of permits in the fishery that are fished on an even fewer amount of vessels. With such a minimal amount of participants, it should be easy for vessel operators to communicate with each other concerning the locations of their gear.

### **Proposal 121 – Oppose**

The Supreme Court of Alaska ruled the Board can only allocate fishery resources "among personal use, sport, guided sport, and commercial fisheries," but not "between" the fisheries in Grunert V State of Alaska. Since C61C permits now allow the use of hook-and-line or pot gear as of May 2017, increasing the allocation for vessels using pots is likely allocating within a fishery and illegal<sup>8</sup>.

### **Proposal 122 – Support**

The North Pacific Fishery Management Council's fishery management plan for Groundfish of the Gulf of Alaska finds 'Sablefish in the Bering Sea (BS), Aleutian Islands (AI), and GOA are considered to be of one stock. The resource is managed by region in order to distribute exploitation throughout the range of the stock.'<sup>9</sup>

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<sup>8</sup> Michael GRUNERT, Appellant, v. STATE of Alaska and Chignik Seiners Association, Inc., Appellees.

<sup>9</sup> North Pacific Fishery Management Council. NOAA. *FMP for Groundfish of the GOA*. 2017. 65-66.





NMFS has been tagging and releasing sablefish since 1972 and have found 'Several tagging studies have shown sablefish to be highly migratory for at least part of their life cycle, with the pattern of movement related to fish size. Young sablefish routinely undertake migrations of a thousand miles or more, and older fish commonly travel the same distance on a return journey. In general, these studies show that small fish in the Eastern areas of the GOA travel North and Westward from their release sites and large fish tagged in the Western areas of the GOA move Eastward. Large fish tagged in the Eastern areas of the GOA have a tendency to remain there.'<sup>10</sup>

Sablefish tagging efforts are centered in three main areas 1- tagging of adults in offshore waters of GOA, BS, and AI; 2 - adult sablefish in inside waters of Chatham and Clarence Straits; 3 - juvenile sablefish in interior bays of Southeast Alaska. NOAA research vessels release these tags, including the majority of the 70,000 released in inside waters. This tagging research has found:

'Clarence Strait sablefish appear to be more directly connected geographically to the GOA than Chatham Strait, showing about a 30% chance of moving, mainly into the EGOA and BC waters. Close to half (47%) of the recovered fish from Clarence Strait releases were recovered in Clarence Strait, however, a high percentage (26%) were also recovered in BC.'<sup>11</sup>

PVOA members have low confidence in the isolated Sablefish surveys for the SSEI fishery. As Sablefish are one stock and highly migratory, they believe it would be more appropriate to manage the SSEI fishery by the more-encompassing Federal survey data. This survey includes nearly all areas where adult Sablefish are found in the Alaska Exclusive Economic Zone (EEZ) and depths range from 82-547 fathoms. In Southeast, this includes the entire offshore Eastern Gulf of Alaska down to Dixon Entrance. The same stations are sampled each survey year and surveys typically occur in odd-years. Stations are located 20-30 nm apart<sup>12</sup>.

The SSEI Sablefish Equal Quota Share fishery could easily be managed by the Federal survey data by adjusting the Annual Harvest Objective (AHO) up or down by the same percentage as the Southeast Outside Acceptable Biological Catch (ABC) each year.

### **Proposal 123 – Oppose**

Lingcod harvest increased between 2014 and 2017 by just over 29,000 round pounds and Lingcod catch is expected to increase in 2018, as the prices have been high in recent years. We fear lowering the size limit could increase removals beyond a healthy level for the stocks.<sup>13</sup>

<sup>10</sup> NOAA Fisheries, Alaska Fisheries Science Center. Auke Bay Laboratories. *MESA: Sablefish Tag Program*. Accessed December 18, 2017. [https://www.afsc.noaa.gov/ABL/MESA/mesa\\_sa\\_sable\\_stp.htm](https://www.afsc.noaa.gov/ABL/MESA/mesa_sa_sable_stp.htm).

<sup>11</sup> Echave, K. B., D. H. Hanselman, and N. E. Maloney. 2013. Report to industry on the Alaska sablefish tag program, 1972 - 2012. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-254, 47 p.

<sup>12</sup> Sigler, Michael F., and Chris R. Lunsford. "Survey protocol for the Alaska sablefish longline survey." Alaska Fisheries Science Center: 1-10. <https://www.afsc.noaa.gov/ABL/MESA/pdf/LSprotocols.pdf>.

<sup>13</sup> Olson, A., J. Stahl, M. Vaughn, K. Carroll, and A. Baldwin. 2017. Annual management report for the Southeast Alaska and Yakutat groundfish fisheries, 2017. Alaska Department of Fish and Game, Fishery Management Report No. 17-54, Anchorage.



### **Proposal 125 – Oppose**

This management tool is used in combination in an attempt keep the sport fishery within their 16% of the TAC allocation, however, in the last 3 years the sport take has been 25% of the TAC or higher. The harvest of nonpelagic rockfish in Southeast Inside waters has increased by 90% from 2012-2016. We support the current retention requirement as a tool to prevent overfishing and selectivity.<sup>10</sup>

### **Proposal 126 – Oppose**

We don't believe personal use and subsistence users should be burdened by the expense of these mechanisms that help release non-pelagic rockfish at depth. The amount of personal use and subsistence users targeting rockfish is much lower than in the guided sport sector. In recent years, subsistence users have harvested less than 5% of the TAC for this fishery.<sup>10</sup>

### **Proposals 127, 128 – Support**

Similar to the growth of targeting sablefish, the guided sport fleet in Southeast has expanded in its harvest of rockfish from 94,538 fish in 2007 to 173,847 fish in 2017. As the proposer states, these are primarily nonresident fishermen.

If you look at only the Sitka area, the sport harvest of rockfish has increased from 38,264 fish in 2007 to 71,214 fish in 2016<sup>14</sup>.

### **Proposals 132, 133, 134 – Oppose**

Proposal 132 would create a sport fishing King salmon bag limit and close waters in Districts 11, 12, 14, and 15 from April 15 to June 30 based on preseason forecasts of Taku River King salmon.

Proposal 133 would base the duration of the troll and gillnet openings in Districts 9, 12, and 14 from April 15 to June 30 on the preseason forecast of King salmon.

Proposal 134 would close the spring troll fishery from April 15 to June 15 in Districts 9, 12, and 14 when the Juneau area sport fishery is closed to King salmon retention.

We oppose these proposals as they don't consider the other salmon species returning to these areas during these times or provide sufficient opportunity to achieve wild fish allocations in 5 AAC 33.363 *management guidelines for allocating Southeast Alaska pink, chum, and sockeye salmon*.

### **Proposal 137 – Oppose**

Under current regulations, in times of King salmon abundance index greater than 2.0, there is a resident bag limit of 3 King salmon 28" or larger and there is no possession limit. This proposal would double the limit and create a possession limit. Three king salmon is a lot for a household to consume, doubling this limit seems excessive.

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<sup>14</sup> "Regional Summary Estimates, Estimates of Southeast Alaska sport Rockfish harvest, 2007–2016." Alaska Sport Fishing Survey. Accessed December 18, 2017. <http://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=region.results>.

### **Proposal 138 – Support**

This proposal would clarify an enforcement issue. If a person trolling for King salmon with two rods were to catch a Coho, it is illegal to retain the Coho. We would support the retention of any salmon, within bag limits, caught while trolling for King salmon with two rods.

### **Proposal 139 – Oppose**

*5AAC33.364 (C)... the board will, in its discretion, adjust fisheries within special harvest areas to bring the gear group within its allocation percentage.*

*(D) The department may not make inseason adjustments or changes in management in or out of the special harvest areas to achieve the allocation percentages established in (a) of this section.*

The Board of Fisheries is designated with the task of allocating fishing areas and fish resources amongst user groups. It is not the job of regional hatchery operators or ADF&G managers to determine gear rotations inseason. NSRAA has spent several years assuming control of the Southeast Cove operation and should have had an allocation plan to present to the Board where it would be open to public comment.

### **Proposals 140, 141, 143, 145, 153, 154, 156, 157, 158, 174 – No Position**

All of these proposals would significantly harm one or more salmon gear types by negatively impacting their access to enhanced chum salmon, wild pink salmon, or wild sockeye salmon. As we stated before, PVOA takes no position on any proposal that we deem will not aid in achieving the fair and reasonable distribution of enhanced and wild fish as outlined in section 5 AAC 33.364 *Southeast Alaska Enhanced Salmon Allocation Management Plan* and section 5 AAC 33.363 *management guidelines for allocating Southeast Alaska pink, chum, and sockeye salmon between commercial net fisheries*.

### **Proposal 142 – Support**

This proposal seeks to adjust any allocation imbalance between the gillnet and seine fleet in Deep Inlet, based on a 5-year rolling average, as per the *Enhanced Salmon Allocation Plan*.

### **Proposal 144 – No Action**

The troll fleet has been behind in their enhanced chum salmon allocation for many years and we support only the portion of this proposal that would allow them to fish in the Deep Inlet THA during cost recovery efforts. During this time there are very few seine vessels catching cost recovery in a small portion of the THA and this could make a difference in their ability to catch their allocation.

We are apprehensive to allow troll vessels during other net fisheries due to our concern for conflicts between the gear groups. When the seine and gillnet fleet fish Deep Inlet it is crowded and vessels are lined up on every available hook off. If this portion of the proposal were removed, we would support the proposal.

### **Proposal 146 – Oppose**

The *Southeast Alaska Enhanced Salmon Allocation Management Plan* is the result of three-years of work by the Southeast Alaska Allocation Task Force to provide fair distribution of enhanced salmon





amongst the seine, gillnet, and troll fisheries. We do not support any proposal that seeks to undermine or alter this plan.

**Proposal 148 – Oppose**

This proposal seeks to increase the time and area available to guided sport salmon fishermen targeting enhanced King salmon in the Herring Bay THA. This sport fishery has become increasingly popular while the 3% enhancement tax to fund operation of the Herring Bay THA is paid for solely by commercially landed salmon.

Under this proposal, King salmon harvested in this area would not count towards the nonresident annual limit. This would likely increase sport fishing activity in this THA after annual bag limits have been caught in other areas.

**Proposal 149 – Support**

This proposal would allow NSRAA and fishermen to utilize late returning Coho in Deep Inlet without an Emergency Order by extending the season to October 31.

**Proposal 150, 176 – Support**

Currently, Crawfish Inlet is a cost recovery only fishery. Proposal 150 will allow all salmon gear groups in the SHA. However, aligning the troll fleet with their enhanced salmon allocation is the priority for Crawfish Inlet, as seen in proposal 176. We support this effort to help the troll fleet obtain their 27-32% of enhanced chums.

**Proposal 151 – Support**

We support this THA management plan from SSRAA to allow access to enhanced King salmon returning to Carroll Inlet.

**Proposals 152, 161 – Support**

During the last several Purse Seine Task Force meetings, industry has asked for clarification between posted markers and closed waters listed in the SEAK Commercial Salmon Fishing Regulations book. We support these update to Whitewater Bay and the Anita Bay THA coordinates and are thankful for the work.

**Proposal 159 – No Position**

Only the Federal Aviation Administration can limit the actions of pilots.

**Proposal 160 – Support**

In recent years, enforcement has ticketed fishermen for operating a gillnet too close to certain streams within THA's also listed in the Anadromous Waters Catalog. THA's are drawn with ADF&G to ensure they do not include streams important to the spawning and rearing of salmon. This ensures the preservation of wild stocks is not at risk from the operation of salmon nets in the area. This proposal is a clarification of the regulations for both enforcement and fishermen.

**Proposal 166 – Oppose**



The Hawk Inlet test fishery provides both run timing and strength data for fishermen and the department. It also generates revenue to offset the cost of aerial surveys necessary for inseason management. The ADF&G commercial fisheries budget has taken many cuts since 2015, including to aerial survey money, and we want to maintain this source of revenue.

In some seasons, an index fishery may not open, while a test fishery would, creating a gap in the data. In 2018, the preseason forecast models from NOAA predict less than 3 million pink salmon will be harvested from the Northern Southeast Inside area, making it a possibility an index fishery on the Hawk Inlet shore would not open.

### **Proposals 169, 170 – Oppose**

These proposals would create entirely new drift gillnet areas. The purse seine and drift gillnet areas in Southeast Alaska were determined years ago and creating these new areas is not in the interest of targeting the wild salmon allocations in 5 AAC 33.363 *management guidelines for allocating Southeast Alaska pink, chum, and sockeye salmon between commercial net fisheries*.

### **Proposal 177 – No Action**

*5AAC33.364 (D) The department may not make inseason adjustments or changes in management in or out of the special harvest areas to achieve the allocation percentages established in (a) of this section.*

As with proposal 139, we are concerned by this request to allow regional hatchery operators and fishery managers to determine gear rotations inseason. It is the Board of Fisheries job to allocate fishing areas and fisheries resources among user groups.

### **Proposals 185, 192, 193, 194 – Oppose**

Access to the majority of salmon fisheries outside of commercial and subsistence fall under the sport fishing regulations and not personal use regulations. These sport bag limits are liberal including 6 of each species daily and 12 of each species in possession of Coho, Chum, Pink, and Sockeye salmon. We are opposed to allowing the use of gillnets for personal use or sport fishing to conserve King salmon in this current time of low abundance.

Proposal 185 would allow gillnets for personal use salmon fishing throughout Southeast Alaska. In 2016 and 2017 only two index streams for King salmon met their escapement goals. These are Keta River and King Salmon River in 2016 and Keta River and Situk River in 2017.

Proposal 192 would allow gillnets for personal use salmon fishing in District 11 where the Taku River has only met King salmon escapement goals in two of the last five years.

Proposal 193 and 194 would allow personal use gillnets in Section 15-A where the Chilkat River has met King salmon escapement once, 2015, in the last five years.<sup>15</sup>

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<sup>15</sup> Heintz, S. C., E. L. Jones III, A. W. Piston, P. J. Richards, L. D. Shaul, B. W. Elliott, S. E. Miller, R. E. Brenner, and J. V. Nichols. 2017. Review of salmon escapement goals in Southeast Alaska, 2017. Alaska Department of Fish and Game, Fishery Manuscript Series No. 17-11, Anchorage.



### **Proposals 190, 191– Oppose**

The Taku River is one of the nine index streams, out of 11, that did not meet King salmon escapement goals in 2016 and 2017. The Taku River has a preseason terminal run forecast of 4,700 fish and the Escapement Goal Range (EGR) of 19,000-36,000 fish.<sup>12</sup> These proposals to increase the Taku River Sockeye salmon bag limit or increase fishing time are likely to increase interaction with King salmon.

### **Proposals 195, 196 – Support**

The annual limit for many nonresident sport fisheries is two times the daily bag limit. We support these nonresident Sockeye salmon limits that create consistent regulations.

### **Board Generated Proposals 234 and 235 - Oppose**

PVOA members are not supportive of the Board Generated Proposals from the October 2017 Work Session. We are apprehensive of the process and short notice by which these proposals were added to the SEAK Shellfish meeting. Furthermore, we don't believe either of these proposals addresses new issues that arose after the call for proposals ending in April of 2017.

Board Generated Proposal 234 would repeal an entire management plan and we are troubled by the process the Board used to add this proposal to the agenda, only three months before the start of the SEAK Shellfish meeting, when the proposal missed the deadlines for the call for both the regulatory meeting and work session accepting Agenda Change Requests. This doesn't give adequate time for the public to be advised of the proposal and debate the best course of action.

It may be time to update this management plan, since areas that were once productive for fishermen have been lost to sea otters and this reduction hasn't been accounted for since the inception of the management plan, however, we do not support this short notice process to update it.

The proposal would also significantly shorten the fall season for the Dungeness crab fishery. There are currently very few commercial fishermen that participate in the fishery into December or even February, and there is no preservation reason to limit their access to this fishery.

We are also opposed to Board Generated Proposal 235 due to the lack of time for users to become aware of the issue. Personal use is accounted for in the Juneau Area where the majority of the personal use red King crab fishery takes place. The other areas open to personal use are very remote and this proposal seems over burdening for the few users.

PVOA's mission statement is to:

"Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat."

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Thank you for your time and dedication in considering public comments. PVOA will have representatives present throughout the January meeting. We are happy to answer any question in person, or by email at: [pvoa@gci.net](mailto:pvoa@gci.net).

Respectfully,

A handwritten signature in blue ink that reads "Megan O'Neil".

Megan O'Neil  
Executive Director



Submitted By  
Ray Landgraf  
Submitted On  
12/27/2017 1:04:34 PM  
Affiliation

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I've fished the Tsiu for 18 years coming up every year in September. The closed area to commercial fisherman should be at least 1/2 mile. I understand the importance of commercial and sport fishing and the need to share the resource. It becomes problematic however when the commercial guys are herding fish into nets at high speed.



Submitted By  
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Submitted On  
12/27/2017 9:46:02 AM  
Affiliation

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I am a commercial fisherman who has served on the Sitka Fish and Game Advisory Committee for the past 15 years. Our committee takes seriously all public input and I believe the outcome of our meetings reflects this. We spent 2 months holding public meeting to discuss these proposals.

Of particular importance to me is the need for bag and annual limits for non-resident anglers. Our resources are valuable and there is no place for unlimited non-resident take. We all depend on these resources: subsistence, commercial, personal sport, and charter. By placing a generous annual limit now there will be fish for everyone into the future. Waiting for a crisis is wrong. A non-resident angler can take **at least** 52 saltwater fish per day in SE. Adding bag and annual limits **regionwide** for blackcod and sockeye is the right thing to do at this meeting. There is not another state in the country that allows unlimited non-resident angler take on valued fish.

**Proposal 116: Support with SFGAC Amendment.** The SFGAC voted 10 in favor, 1 abstain, to adopt a nonresident bag limit for blackcod with 2 daily, 2 in possession, 6 fish annual limit, and recording catch. **I support this.** Blackcod is very valuable and this provides opportunity for non-residents but also places an appropriate value on the resource. This is critical.

**Proposals 195 and 196: Support establishing non-resident annual limits for sockeye salmon in salt and fresh water. I support these.** Sockeye are an important subsistence fish. Limits are best imposed before there is a conflict. Twelve fish is very generous, allows for opportunity for non-residents, but takes a step towards protecting use by subsistence users.

Think a few years out and head off a crisis before it happens. Bag limits and annual limits for non-residents on valuable fish are the best tools for keeping us all catching fish into the future. I would like to serve on the Groundfish committee addressing proposal 116.



ADFG has mismanaged the 12 Mile are shrimp fishery for several years.  
This area (South of Kasaan into upper 12 mile arm)

is critical to maintaining a personal use fishery. Commercial shrimping and/or crabbing should be restricted within 5 miles of the communities of Hollis and Kasaan.

Also, the king crab fishery in the unsurveyed areas should never be opened until a proper ADFG survey can be carried out. Opening this area to commercial effort will destroy both the personal use fishery and future commercial fishery. Be sure of what is being opened up before moving ahead.

Respectfully,

Robert A. Andrews  
Craig



Submitted By  
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Submitted On  
12/27/2017 7:09:04 PM  
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alaska seine boat owners association

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***Alaska Seine Boat Owners Association is a sister organization of Purse Seine Vessel Owners Association. We represent approximately 350 vessels and crews, approximately 250 of which are purse seiners along with 1500 Alaska purse seine crewmen. Our members fish throughout the state.***

### **ASBO supports Proposals 140(with modifications), 142, 143, 145, 155(with modifications) and 166.**

The general tenor of these proposals are attempts by various user groups to bring the commercial enhanced salmon users into a relatively closer balance than currently exists. The history of this enhanced allocation issue began with the 1994 Enhanced Allocation Plan. ASBO believes that this is an exceptional long term structure to attempt to maintain a fair balance between the user groups.

For over a decade there has been a major shift that continues with the pressure of the drift fleet, the decreasing opportunity for the smaller boat fishermen who drift who cannot afford IFQ's and no longer maintain their traditional income from crab or dive fisheries due to sea otter predation, and, aside from 2014's record dungeness year, have suffered severe financial harm by these non-enhanced salmon factors. So there has been an increase in fished drift permits by approximately 30% in the past two decades, most of which has been focussed upon enhanced allocation.

Indeed, in the drift gillnet fisheries targetted on northern wild SE sockeye, vis a vis, Taku, the the Lynn Canal systems of Chilkoot and Chilkat, the drift fleet currently uses sockeye mesh only after the large enhanced DIPAC returns transit through the D111 Taku wild sockeye fishery as well as the D115 Lynn Canal wild sockeye fishery. These drifters are in traditional mixed stock corridors and are currently and historically being managed for wild sockeye bound for the Chilkat, Chilkoot and Taku Rivers.

But, since the advent of large scale DIPAC chum production in 1996, the past two decades have seen a harvest ratio of wild, targetted sockeye of nearly 99 sockeye per summer chum to a ratio of 1 sockeye per 10 enhanced chum salmon. So we have numbers such as 2017 in D115 Lynn Canal, where we had over 1 million enhanced chum salmon harvested in a fishery where the target specie, sockeye salmon, was less than 50,000, for a ration of 20 hatchery salmon per targetted wild sockeye.

Along with this background of a changed fishery, which we do not oppose nor wish to see major changes, we'd just like to remind the board members that the traditional markers of a wild fishery which changes it's target species to a hatchery fish and that had a 99 to 1 wild target of sockeye to one which has 1 wild sockeye per 20 enhanced chums, thereby intentionally changing mesh size and changing early season sockeye harvest rates, thereby skewing the true numbers passing through the fishery.

This is occurring throughout Southeast with the drift fisheries. District 8 and Chichagof Pass, near Pt. Nemo, often has over a 95% enhanced chum harvest during much of July. These are mixed stock corridors, being managed for sockeye salmon as the target species under the official auspices of the ADFG Wild Stock Sustainable Management Policy. These mixed stock corridors are being utilized to harvest the bulk of what is causing the imbalance in the Enhanced Salmon Plan.

We bring this to your attention so that you will recall in our opposition category that we do not wish to see this continued with the troll fishery proposals. The experimental June chum fisheries in Chatham Strait on Homeshore and Hawk Inlet should be allowed to sunset.

We also bring this to your attention as you will see proposals that we vigorously oppose that come from drifters and their association that seek to punish traditional, historical fisheries that don't even occur in years of lowered abundance. Northern Chatham Strait hasn't been fished, safe for test fisheries, in 2008,2010,2012,2014 nor 2016 due to low wild pink salmon returns. Even though we could have harvested millions of enhanced chum salmon. This wouldn't occur in a drift fishery. They'd just catch a higher rate of enhanced chums.





**No matter what the Enhanced Allocation Plan of 1994 has the power to do or undo, ASBO believes there needs to be three guiding principles in the application of the Plan.**

**A. The Enhanced Salmon Policy does not trump the Wild Sustainable Salmon Policy. Period.**

It is more important to get our balanced escapement needs met than the harvest differential rates of the different gear groups. The purse seine fleet doesn't believe in managing wild stock fisheries nor corridors for the specific targeting of enhanced salmon. Seine fisheries in all mixed stock corridors in SEAK are based solely on the wild salmon transiting those areas.

We believe hatchery harvest to be better achieved through terminal harvest.

But take note that we do not oppose the current mixed stock drift fisheries, nor are we asking to take away historical time and area away from the drift fleet.

**B. The Plan provides for parameters for change, and we need change in 2018.**

The Plan, while imperfect, sets long-term parameters. Imperfect. Yeah. Who expected Hidden Falls to fail this past decade. That's part of the seine problem. Who expected trollers to figure out how to get chums to bite. We didn't recognize that even with over 20% of SEAK coho production being enhanced and trollers harvesting 2/3 of them, that wouldn't be enough. Who expected the drifters to increase their reliance on enhanced salmon. Who expected we'd all increase our reliance on enhanced salmon.

But while it's the best we've got and will get for a Plan, we must avoid knee-jerk responses. That is why we advocated for minor changes in 2009 to fishing time for seiners, perennially below their range as well as some minor changes that year for drifters, perennially above their range. And we made some modifications to most of our troll programs because the troll fleet is and will always be below their range.

In 2009 we made some changes. In 2012 we made some bigger changes.

In 2015 we turned back the clock due to difficult economic conditions with the drift fleet and even this major giveaway to the drift fleet apparently couldn't satisfy their hunger for ever larger and growing enhanced salmon harvest.

Which brings us to 2018. We recognize that there is no magic bullet here, just a slight turning back of the tide.

and

**C. Any changes to the Enhanced Allocation Plan should never take a gear group completely out of a historical fishery.**

We all have boat payments. We plan for our future and the future of our children and grandchildren. When we fish an area for 10 years, 20 years, 30 years, we expect to be able to go back and fish that hatchery area next year also. So changes made to harvest imbalance must never, ever exclude a traditional fleet's harvest.

So the idea of fishing time adjustments, say 2 days seine per day of gillnet during times of imbalance, or 2 days of gillnet to 1 day of seine when the imbalance shifts the other way,. That's the way to make incremental changes to allocation. Even if the imbalance is so bad that a gear group only gets one day a year. Complete opposition to the elimination of a traditional, historical fishery is all we commercial fishermen have ground to stand upon.

If we are not completely opposed to elimination of traditional, historical fisheries then sportsmen, Canadians, Washingtonians, Columbia River tribes and many others would be more than happy to eliminate all of us.... Gillnetters, Trollers as well as Seiners.

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**Proposal 140-SUPPORT**

We support a 2 day seine to 1 day gillnet rotation, lasting all season.

So we oppose that part of the SEAS Proposal that kicks out the drift fleet.

Anita Bav is very important to the drift fleet, as it is the seine fleet.



But the early and later portions of the season especially have been tough on the seine fleet as with scratch fishing continuously benefits the guy who can make a living off a couple big fish.

The 2 seine to 1 drift should be in place from beginning to end, May through October. Statistics will show little seine harvest early and later in the season. That is because the drifters take them all. Seiners cannot fish every day and need a basic minimum buildup to harvest to pay for the overhead and costs of a 5 to 6 man crew and a vessel that costs, on average 4-5 times the cost of a gillnetter.

If we are going to make progress on the enhancement imbalance, this is how we do it. We move days from one gear group to the other. In terminal areas.

In lieu of this, we would encourage the Board and the ADFG to dig deeply into their conscience and the state's constitutional mandate to manage for wild stock salmon populations. In other words, when the drift harvest approaches 95% enhanced salmon in an area purportedly being managed for wild stock salmon, then that area should be closed. While this would be a last resort, we believe it would have the same impact or even more on the imbalance of the allocation plan.

WE are not publicly asking for closing those mixed stock, wild stock corridors that are currently being used by drifters to harvest at least 75% of their enhanced salmon, that would be our only other alternative if we are not allowed to switch days in enhanced terminal harvest areas.

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#### **Proposals 142 and 143- SUPPORT**

We also support a 2 to 1 rotation of seine to drift at Deep Inlet. Reference comments above.

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#### **Proposal 145 SUPPORT**

Nakat has the highest likelihood of straying and is indeed an excellent example of a fleet losing traditional and historical fishing grounds.

Indeed at the time Nakat was taken away from the seiners, the rationale was that the drift fleet was in the lower end of their range and the seiners were at the higher end.

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#### **Proposal 155 SUPPORT, WITH MODIFICATIONS**

The Hawk Inlet cap of 15,000 wild sockeye is not responsive to anything but outdated numbers.

Millions upon millions of pink salmon transit this corridor and it is the only area available to the seine fleet to harvest Lynn Canal pink salmon bound for Berners, Endicott, Chilkoot, Chilkat and Taku Rivers.

8 of the 10 largest northend pink salmon returns in history have occurred since 1989, when this number was marked for Hawk Inlet. Foregone harvest of pink salmon on certain years have exceeded the value of the entire wild catch by the drift fleet of all species.

ADFG surveys and monitors pink salmon south of St James Bay in Lynn Canal. So there is no accounting for management purposes of the massive Lynn Canal drainages that produce pink salmon. Nor for the mighty Taku River, which, while non-productive on king salmon lately, is a huge historic pink salmon producer.



Two things we would ask for to modify this proposal

## 1. There needs to be an upward expansion and revision of the 15,000 wild sockeye.

15,000 every year is very fair. But if we only fish 2 of each 5 years and catch all 15,000, then we really only end up with 6000 a year. That was not the boards intent in 1989.

It was 15000 a year. While we wouldn't expect to harvest 150,000 in one year and then take 9 years off, it is criminal to be held to such a cap as in 2011 while harvesting 1 million pink salmon a day we were closed July 19 to avoid exceeding the cap.

Furthermore, we now have the best Genetic Stock ID program that occurred 2012-14, so we know what is being harvested.

In the real world, with better science and numbers, it should be a different number depending upon the strength of the Taku, Chilkat and Chilkoot systems, which comprise over 80% of the Hawk Inlet sockeye harvest.

So with a year when there are total cumulative run sizes on these rivers of 750,0000, our 15,000 would comprise less than 2%.

Hawk Inlet will always be weak stock managed. Millions of pink salmon will always get by and be wasted.

But we can stop some of the overescapement and wild stock carcass carnage on these rivers with a flexible number rather than 15,000.

Many years we harvest zero. In 2013, the largest pink salmon year in history, we harvested just 2800.

Had we been able to harvest just 10,000 more sockeye in 2011, we'd have contributed at least 2 million pink salmon worth 7.5 million dollars wholesale to the SEAK economy.

Our Juneau managers have proven that they can and will underharvest on the 15000 number when there aren't large numbers of northbound pinks. They also need to be entrusted with a higher number when we do have large surplusses of pink salmon such as in 2011.

## 2. August 2 is not a reasonable sockeye cutoff date.

In the Pacific Salmon Treaty we manage for sockeye through stat week 30, which averages around July 24. August 2 is past the peak of the northend pink salmon run. It may not look that way on paper but that's because we hardly fish in July. With warmer ocean currents, pink salmon are arriving earlier and we're missing them. Sockeye salmon caught in Hawk Inlet should not count against the cap post week 30, as it has been in the Pacific Salmon Treaty since 1985.

In the Kootznawoo, Inc.-SEAS negotiation the dates chosen to open further down the Admiralty shoreline to avoid sockeye at Kanalku are July 17 below Hepburn and July 21 below Fishery Pt.

August 2 is a date that is long overdue for a change.

=====



While Pt Augusta is a great index fishery, many years large numbers of pink salmon avoid the Chichagof shoreline entirely and swim up Lynn Canal or to the Taku River without ever seeing a seiner. While 112-16 is an interesting idea for an index fishery, it is likely that Upper 114, nearer Adolphus, like Eagle Point, or a spot along Lemesurier Island or the Homeshore would likely result in great information as well.

If not possible to implement or if this has to occur with baby steps, fine. Let's at least have some more test fisheries in the northern corridor to assess run strength. The Icy Strait and upper Chatham corridor is a tough area to manage. In 1973, we supported temporary closure as our pink runs had been depleted to single digits.

Now with historic runs occurring and millions of pink salmon pouring through the northend on odd year cycles, more test fisheries and index fisheries would assist in managing the Juneau area.

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ASBO Opposes Proposals 141, 146, 154, 156, 157, 158, 167, 168, 169, 170, 173, 174, 185

=====

Most of these proposals are ill-conceived, many have seen deep snowbanks in prior form and although it is hard to take most of these seriously we will take a stab at them.

#### **Proposal 141 OPPOSE.**

While we support the drift fleets inclusion in both fisheries, a 1-1 rotation was tried in 2012 for the 2012-2014 seasons and resulted in little or no change to the Enhanced Allocation numbers. Somuchso that USAG was given a 2-1 peak fishing time waiver in an agreement covering the 2015-2017 seasons and was so unsatisfied with the results that even they are here asking to go back to 1-1.

To make a meaningful change in the Allocation numbers without unduly restricting the drift fleet from Pt Nemo, Pt Bridget or Baker, we are dealing with just terminal harvest areas. And Deep Inlet and Anita Bay are the two we share.

We tried 2 gillnet to 1 seine for nearly two decades. Then we tried 1-1. Then back to 2-1.

So now let's work within the parameters we have, without getting into the ugliness that would result if the drift fleet was made to live within the spirit of the Sustainable Wild Salmon Management Policy that southeast seiners live with.

2 days seine to 1 days drift season long.

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#### **Proposal 154 OPPOSE**

Besides gillnet dropout and deadloss to pink salmon, there is no fleet that intentionally kills and throws away as bycatch more pink salmon in the world except for the SE troll fleet possibly on some years.

If there were any interest in pink salmon harvest by gillnetters then there'd be more than 20 pink salmon nets out of the 400 nets in the drift fleet.

This is an old idea whose time went bump in the night decades ago.

=====

#### **Proposal 156 VIGOROUSLY OPPOSE**



Good to see USAG is at it with climate change. We agree that climate change has driven pink salmon to return up to two weeks early. So change the date from August 2 to around July 20th and we'd cover the real impact of climate change.

USAG has had conversations about this and while we know there are a couple of sockeyes around after August 2, since seiners rarely have a chance to catch any of the near 1 million annual population (including Snett and Chatham systems), we know there are a few lurking around post August 2.

But not many. This is a punitive proposal and although imaginative, does nothing to help with the reality that allowing millions of excess pink salmon to migrate through the gillnet corridors of 111 and 115 likely hinders drifters with pink salmon that now have to be disposed of and take up valuable space aboard the small vessel that is intending to carry the more valuable chums and sockeyes.

Indeed, it is likely that the larger pink years when gillnets are sunk with pinks--- especially years when processors paid gillnetters for up to 10,000 lbs of pink salmon if they delivered none. And they were paid nothing if they delivered any.... it is in these years that an extra 2 million pinks curbed at Hawk Inlet might even cause the drifters to catch far more than 10,000 extra sockeyes due to being too busy picking and discarding pink salmon.

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### **Proposal 157&158 VIGOROUSLY OPPOSE**

This is a previously well thought out agreement that had a solution that USAG is now backing out of. The drift fleet harvests well over 85% of all sockeye in northern Southeast Alaska.

Not by treaty. Not by biology. But by bullying.

A seiner catches a northern sockeye and he catches up to 100 wild pink salmon along with it.

Sometimes that ratio is 1000-1 Wild to wild.

A northern drifter catches a northern sockeye, his target specie, and he catches a minimum of 10 enhanced chums and up to 20-1 ratios. In 2017 in Lynn Canal -D115- that ratio was over 1 million enhanced chum to less than 50,000 sockeye. That's 1 intended wild stock capture to 20 hatchery fish. And he probably had to kill or dump or dropout at least a few pinks just to get that 1 sockeye.

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### **Proposal 167 VIGOROUSLY OPPOSE**

This is a good example as to why a proposal should at least have to get a 2nd.

Bet this guy doesn't even plan on coming to Sitka.

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### **Proposal 168 VIGOROUSLY OPPOSE**

Guess here's his second. So let's ban drifting 1/2 mile from the beach throughout SEAK and I'll bet we'll get thousands more sockeyes back to the rivers. That's why these guys couldn't even get their organization to support them.

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### **Proposal 169 VIGOROUSLY OPPOSE**



Want to catch and keep and sell pinks on big pink years. Buy a seiner.

Dozens of gillnetters have done so already.

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#### **Proposal 170 VIGOROUSLY OPPOSE**

District 10 has been a historical seine area since the dawn of time.

Wanna fish there, buy a seiner. When you buy a permit, check on the area it allows you to fish.

Had the drift fleet not discarded millions upon millions of pinks over the years and if USAG can show where there have been attempts at harvesting pinks in the areas currently available, we could perhaps have taken this seriously.

This is an insulting USAG proposal.

=====

#### **Proposals 173 and 174 OPPOSE**

Our comments at the very beginning address our concerns here.

While we were supportive of these expanded quasi-enhancement percentage building fisheries in wild mixed stock corridors, we can no longer support using the Enhanced Allocation Plan of 1994 to continue to trump Alaska's Sustainable Wild Salmon Policy and our commitment to our wild stocks first.

Hatcheries are simply here to complement our wild stocks.

Southeast is still wild salmon country.

To bring in fisheries intended to augment percentages in a hatchery sharing formula and allow these fisheries to cause problems in major wild stock corridors, especially corridors where there may not be enough hook and line fish to go around, not to mention to populate our local rivers, such as Farragut, with just 200 kings, or the Taku, with 4500 expected this year.

=====

#### **Proposal 185 OPPOSE**

Another proposal that needs a second. Bad idea.





Submitted By  
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Submitted On  
12/28/2017 7:12:14 PM  
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My name is Rollin Young and I have submitted three proposals dealing with the commercial herring sac roe fishery in the Juneau area, #95, 96 and 100. I support the passage of these proposals. Two of the proposals are that the fishery be closed permanently while the other one offers modification to the existing harvest level calculations. I feel the fishery should be closed and only proposed the modification of the harvest level in the event the other two proposals were not accepted. I had hoped to attend the board meeting in Sitka but other obligations came up and won't be able to.

My thoughts and reasons for these proposals are included in the proposal. That being said, I would like to stress that I am not proposing these change lightly. I realize that the herring fishermen holding permits in this fishery will be affected by the change but don't feel it will be dramatic. I feel the conservation of the herring stocks to be very important and that due to the fishery being closed for the last 35 years the economic impact on the fisherman will be less than if it were an active fishery.

In reviewing the permit holders activity in the herring fishery over the last 35 years it appears that almost 90% of the current permit holders have never fished the Juneau sac roe fishery as a permit holder. Another way of saying this is that of the current permit holders 90% have acquired that permit since the last commercial fishery in Juneau. I would hope that when they purchased their permits they took into consideration the fact of the Juneau fisheries closure and of the depleted stocks when agreeing to the purchase price for the permit.

Over the last 35 years much has changed in the herring sac roe fishery. The value of the fishery has declined dramatically and the price to the fisherman has decreased. In the late 70's early 80's roe herring was selling for over \$2,000 a ton (inflation adjusted price of almost \$6,000). In 2016 roe herring was selling for about \$250. This has partially been caused by changes in the Japanese market and the value of the dollar to the yen. I don't believe the price of roe will ever increase to where it was in years past.

In the last few years the fishermen in the Sitka herring fishery have co-opted the fishery to reduce operation costs and increase their profit from the fishery. Too many fishermen it was not cost effective to take their boats to Sitka to fish (fuel, moorage, food...). I point this out to show that the fishery is not as valuable to the fisherman as it once was.

In the years since the last commercial herring fishery in Juneau there have been numerous changes in the area. The whale populations have increased and a very viable tourist industry has developed. There has been a large increase in the sport fishing effort, both sport and charter. Sightseeing, bird and animal watching, photograph and many other activities have developed around the herring stocks. It is my belief that the herring stocks in the Juneau area are fully utilized at this time and are more valuable to the people of Juneau as an unfished stock supporting the other fish and wildlife resources and uses in the Juneau area.

Again, thanks for your time.

Rollin Young





Submitted By  
Ronald Ott  
Submitted On  
12/28/2017 6:25:34 AM  
Affiliation  
sports fisherman

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. I have fished annually on the Tsiu since the year 2000 with Alaska Wilderness. I believe the area is a precious resource for Alaska and a prime destination for sports fisherman. Over the years I have experienced unpleasant times when netters are in the area creating some danger for shore fisherman. Current regulations separating commercial from sports fisherman should be maintained.

I have experienced amazing fishing which keeps me coming back.

In regard to netting. Netting/herding should not be allowed in areas where the river is narrow and there is narrow channel with a deep drop off effectively blocking the river to migrating fish. The recent natural shortening of the river channel there can only create more conflict between fishermen and netters, netting should not be expanded.

Thank you for your interest in protecting this resource.



Submitted By  
Russell Thomas  
Submitted On  
12/28/2017 4:57:54 PM  
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My name is Russell Thomas and I am the general manager for Experience Alaska Tours. I am writing in regards to proposal 60, which is attempting to establish a super exclusive crab fishery mirrored off the George Inlet Super Exclusive Sport Crab Fishery that our company participates in down in Ketchikan.

I was not with the company when the Super Exclusive Fishery first came in front of the board, but I have been involved in a couple of changes to the regulations since then. In my opinion, the restrictions placed on us under this fishery are onerous, particularly in regards to how the regulations treat our crew. We were successful in implementing some changes that allowed us to de-register our crew and added provisions that allowed the company to replace a captain or crew member mid-season, but current restrictions still prohibit our crew members from commercial crabbing, taking another charter, and restricts the manner in which we can use the vessels assigned to the Super Exclusive Fishery.

I am not opposed to this type of opportunity being opened to other businesses in other places. We have been able to generate substantial economic benefits in the Ketchikan area with this tour, plus purchase tens of thousands of pounds of locally caught commercial crab each year to serve to our customers. The fact that pulling the crab pots, releasing most of the catch, and allowing our guests to handle a crab on each tour appears to have no noticeable effect on the resource after 14 years of operating our tour is proof positive that tours like ours can be eco-friendly, sustainable, and economically viable.

My concern is that Proposal 60 looks to implement the same type of fishery that is operated in George Inlet but without any of the conditions placed on the fishery, the crew, or the equipment that are currently in place in George Inlet. The George Inlet Super Exclusive fishery was brand new and the Board wisely put into place many restrictions as a way to gauge how it would work, what effect it would have in the stock, and to determine its viability. If the Board now determines those restrictions are no longer necessary, they should be relaxed and eliminated for the George Inlet Fishery along with the new Super Exclusive Fishery in Sitka. However, if the Board determines that those decisions were wise and some of the reasons for their implementation are still valid, those same restrictions that are applied to the George Inlet Super Exclusive Fishery should also be applied to the fishery in Sitka.

I appreciate your consideration in this matter.

Regards,

Russell Thomas



Submitted By  
Russell Thomas  
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12/28/2017 4:43:14 PM  
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Ketchikan, Alaska 99901

My name is Russell Thomas and I am general manager of Alaska Sportfishing Expeditions, a group of three family-operated fishing lodges in Ketchikan. I am writing regarding the Unik River Chinook Action Plan that is before the Board this cycle.

I am asking the Board to consider Action #1 - Sport Fishery, Option A, Status Quo. My reasoning is the Department's report stating that EO management measures implemented in the sport fishery since 2015 have effectively eliminated the sport catch of Unik River Chinook. I realize it is statistically improbable to assume that sport fishermen did not harvest a single Unik River Chinook salmon in 2017. However, no Unik River coded-wire tags were recovered in the fishery, when historically speaking, an average of 4 tags had been recovered prior to EO management action being implemented.

As I advocate for status quo, I am hesitant to do so because I know it will appear that I am advocating for cuts to all fisheries except those that affect our customers. If the data is inaccurate and the Board determines that recent cuts have not all but eliminated the sport take of Unik River Chinook, I would support further action to the sport fishery to ensure the stock is protected. However, if in fact we have all but eliminated sport harvest of Unik River Chinook through EO management action taken in 2015, 2016, & 2017, further cuts to the sport fishery in Behm Canal will not help the Unik stock and will deprive fishermen of opportunities to cut other stocks harvested in the fishery.

As for other action to help Unik River Chinook relating to other gear groups, I would ask the Board to use the same measuring stick. If measures currently in place are meeting conservation objectives, then the status quo should suffice. If they are not, then additional cuts should be made in those fisheries (as has previously been done in the sport and commercial fisheries) to address those concerns. Exploitation rates in the sport fishery on the Unik River Chinook stock seems to have been fairly stable over the last 10 years. In contrast, the net and troll exploitation rate has significantly increased. It would stand to reason that the department would look at the causes of those increases in exploitation and ensure the action plan takes steps to mitigate those increases. In the end, it is a shared resource and all user groups need to be responsible for ensuring the stock gets the best chance possible to recover.

I appreciate your consideration and look forward to working with the Board and Department as we continue toward the goal of sustaining the SE Chinook resource.

Regards,

Russell Thomas



Alaska Department of Fish and Game  
Board of Fisheries Support Section  
Glenn Height, Executive Director

RE: Miscellaneous Business Sitka Open Pound Information Documents

December 27, 2017

Thank you for continuing the discussion of Open Pound Herring Roe on Kelp being used as an alternative harvest method for existing Sitka Sound seine permit holders. Most of you should know the history of this concept and the unique situation this proposal finds itself in today. The following information was submitted for the last Board cycle (then known as Proposal 126) for the benefit of new Board members and as a refresher for those already familiar with the concept.

Unfortunately this concept is not on your agenda as a proposal due to the Department of Law determination that the Board is not able to make a decision on it until action by Commercial Fisheries Entry Commission (CFEC). CFEC, and their legal counsel, have stated the Board should act on the proposal first. CFEC will not take up this issue again without a clear showing that this concept and proposal is something the Board would actually approve. This puts things in a difficult spot. As stated and submitted to the Board in past documents, according to ours and others understanding of the statutes involved the Board should be able to decide on methods and means in a fishery and then CFEC would decide if the decision violated the purpose of the Limited Entry Act.

This concept and proposal, as you should see or have seen, presents a way to increase the value of the Sitka herring resource and reduce the amount of herring being extracted. This concept and proposal is, for all practical purposes, how resources should be managed: Acquiring more value with less harm to the resource. Unfortunately, again the Board does not have the ability to vote on it. The only option apparently is for the Board to craft another letter to CFEC to, once again, ask them to adjust the administrative area lines so the Board can make a formal vote on the proposal. It seems we are going around in a circle as this request has already been made and CFEC chose no action. This proposal was not supposed to be decided by CFEC. This proposal was supposed to be decided by the Board. If later we find it violates the Limited Entry Act then so be it but at least the process would have gotten to that point rather than having a great idea swept aside as a result of a difference of legal opinion over State statutes. The Board should be allowed to vote on this proposal.

Open pound spawn on kelp (SOK) in Sitka Sound was first proposed to the Board in 1996. In 1998 and 1999 an experimental SOK fishery was conducted in Sitka Sound. Two decades have passed since the experimental fishery but the data, studies, and reports produced are still relevant. The market for herring roe products has not changed much from the time these documents were produced. A finite market for existing herring roe products still remains but expansion is possible with the addition of the thinner product that would be produced with SOK. Currently, issues regarding resource conservation and subsistence needs have come to the forefront and the economies of the fishery have been in decline. Diversifying the fishery with SOK as an alternative harvest method would address many of the concerns surrounding the fishery while improving the overall value of the fishery.



This PC contains the following documents:

- Spawn on Kelp and the Sitka Sound Herring Fishery.
- ADFG Report to the Board re: 1998-99 Experimental spawn on kelp fishery in Sitka Sound.
- Assessment of Macrocystis Biomass, Quality, and Harvesting Effects in Relation to Herring Roe on Kelp Fisheries in Alaska.
- Open Pounds and the Traditional Subsistence Fishery.
- An Update of Market Variables Affecting Demand in Japan.
- ROK Marketing Questions and Answers.
- Letter from Elderwood Trading regarding SOK in Sitka Sound.

The markets for Sitka Sound SOK are not the markets for thick SOK, but for a thinner product at a lower price point with a perceived value which can be more easily consumed in the marketplace. The existing market for SOK is hampered by large fluctuations in volume which have limited market expansion. SOK production in Sitka Sound would ease fluctuations in overall supply giving distributors the opportunity to expand the market, generate more awareness of the product, and increase demand for the product. Increased demand leads to higher prices. This will not happen overnight but it is time for a departure from status quo. SOK in Sitka Sound is a step in the right direction.

Respectfully Submitted,

Ryan Kapp

## Spawn On Kelp and the Sitka Sound Herring Fishery

Allowing an Open Pound Spawn on Kelp (SOK) fishery in Sitka Sound will increase the overall value of the fishery while killing less fish than the existing harvest method.

The biology of spawning herring is a big factor in producing more value from the same biomass.

Currently, herring harvest can begin when roe recovery is sampled at 10% roe weight. Put simply: 100 tons of fish equals 10 tons of eggs. In some Sitka Sound openings roe recovery has been as high as 13%. In an experimental SOK fishery conducted in Sitka Sound in 1998 and 1999, Alaska Department of Fish and Game determined that 100 tons of herring biomass harvested with SOK converts into 27 tons of product. This represents a recovery of 27% which more than doubles the existing fishery recovery.

The reason for this increase in weight is biological. Upon fertilization the herring egg hydrates with water increasing the weight of the egg. SOK eggs are spawned, fertilized eggs that are hydrated while seine caught sac roe are pre spawn eggs and not hydrated. Because of this hydration the weight of an individual egg produced with SOK is more than twice as heavy as an individual sac roe egg.

With SOK the value of the eggs is increased as well. For example: 100 tons of herring at current prices (optimistically figure \$200 per ton) is worth \$20,000. That same 100 tons of herring harvested with SOK equates to 27 tons of product or, for simple math, a little over 50,000lbs. 50,000lbs of product sold at current prices (realistically figure \$5 per pound) is worth \$250,000. In this scenario the SOK product is worth more than 12 times the value of the traditional sac roe product.

While harvesting with SOK increases the value of the fishery product the best part is with Open Pound SOK no herring are killed. An Open Pound SOK fishery means the herring can swim into and out of the kelp as they please. There are no nets used at any time. The fish swim in, spawn, and return to sea making them available to spawn again in the future.

Increasing the value of the resource while causing the resource less harm is a win / win scenario. Incorporating Open Pound SOK into the Sitka Herring fishery would be a benefit both now and well into the future.

**Sitka Sound Herring Spawn on Kelp**  
**Open Harvest Platform**  
**Experimental Fishery Report**  
**Spring 1998**



Submitted to  
Alaska Department of Fish and Game  
Commercial Fisheries Division  
ADF&G Contract No. 11-122-98

Submitted by  
Paul Gronholdt and Associates  
P.O. Box 288  
Sand Point, Alaska 99661

Prepared by  
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Sitka Sound Roe on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

## EXECUTIVE SUMMARY

In response to a call for change in the Sitka Sound herring fishery, the Board of Fisheries prompted the Alaska Department of Fish and Game to conduct an experimental fishery using the Open Harvest Platform roe on kelp gear alternative. The goals of exploring diversification of the fishery were to improve conservation and encourage greater economic yield to participants.

Paul Gronholdt and Associates carried out the Experimental Fishery in accordance with contract specifications outlined by the Alaska Department of Fish and Game. The team's experience, good weather and an excellent herring return contributed to PGA's attainment of the goals of the experimental fishery.

The PGA team worked in concert with ADF&G research staff to support sampling efforts and generally track the fishery. PGA maintained communications with ADF&G staff from March 15 through the consummation of final product sales in Japan in the late summer.

This report provides a narrative describing procedures and schedules involved in the execution of the experimental fishery. Additional documentation on the harvest details is provided as attachments to this report.

### MACROCYSTIS KELP HARVEST

About five tons of *Macrocystis* fronds were harvested from a single kelp bed along the north shore of Heceta Island, Sea Otter Sound. ADF&G reports that this included an estimated 4,080 fronds, each bearing an average of 16 blades. Thus, an estimated 65,280 total blades were "fished" as spawning substrate.

### OPEN HARVEST PLATFORM FISHING

About 47 fishermen, consultants and processing crew were directly involved in the fishery. Four platforms were fished in Sitka Sound for two to four days each. Excellent spawn coverage was achieved. They carried out kelp gathering, rack loading, fishing and harvesting from March 16 through the 25th. Processing continued for an additional 2-1/2 weeks.

### HERRING UTILIZATION

An estimated 104 tons of herring provided spawn for the final product harvested in the experimental fishery. 6,900 tons of herring were taken in the traditional sac roe fishery.

### PROCESSING AND MARKETING

The total yield of this effort was 57,038 pounds of "Kazunoko kombu", which sold for 261,538 USD. 74% of the product was graded as #1 or #2, and the average price was \$5.46 per pound. Grade 5 fetched \$0.45 per pound, and Grade 1 paid \$7.58 per pound.





**Sitka Sound Roe on Kelp Experimental Fishery Report**  
**Paul Gronholdt and Associates March 1998**

Fine silt found in the spawn layers made processing very difficult. Half of the product required light-table examination and special cleaning. Quality was impacted considerably, and the final price paid for the product reflected this problem. Experts feel that Sitka Sound resources and the level of local fishery sophistication can be focused to meet the stringent standards of an emerging Japanese market in the coming years.

**SUBSISTENCE INTERACTIONS**

PGA coordinated fishery logistics through their Sitka Tribe subsistence liaison, Mike Miller. The Sitka Tribe's attorney, Tribal biologist, Miller and other tribal leaders indicated that none of the conflicts that Tribal members had anticipated transpired during the experimental fishery.

**ENVIRONMENTAL AND CONSERVATION MERITS**

The environmental and conservation merits of this fishery were demonstrated in 1998. The fishery appeared to leave minimal impact to the kelp bed or Sitka Sound ecosystem. PGA's observations indicate that neither the kelp nor herring involved in the fishery were killed. This sublethal harvesting method has clear conservation benefits for both of these resources.

**ECONOMIC BENEFITS TO SITKA**

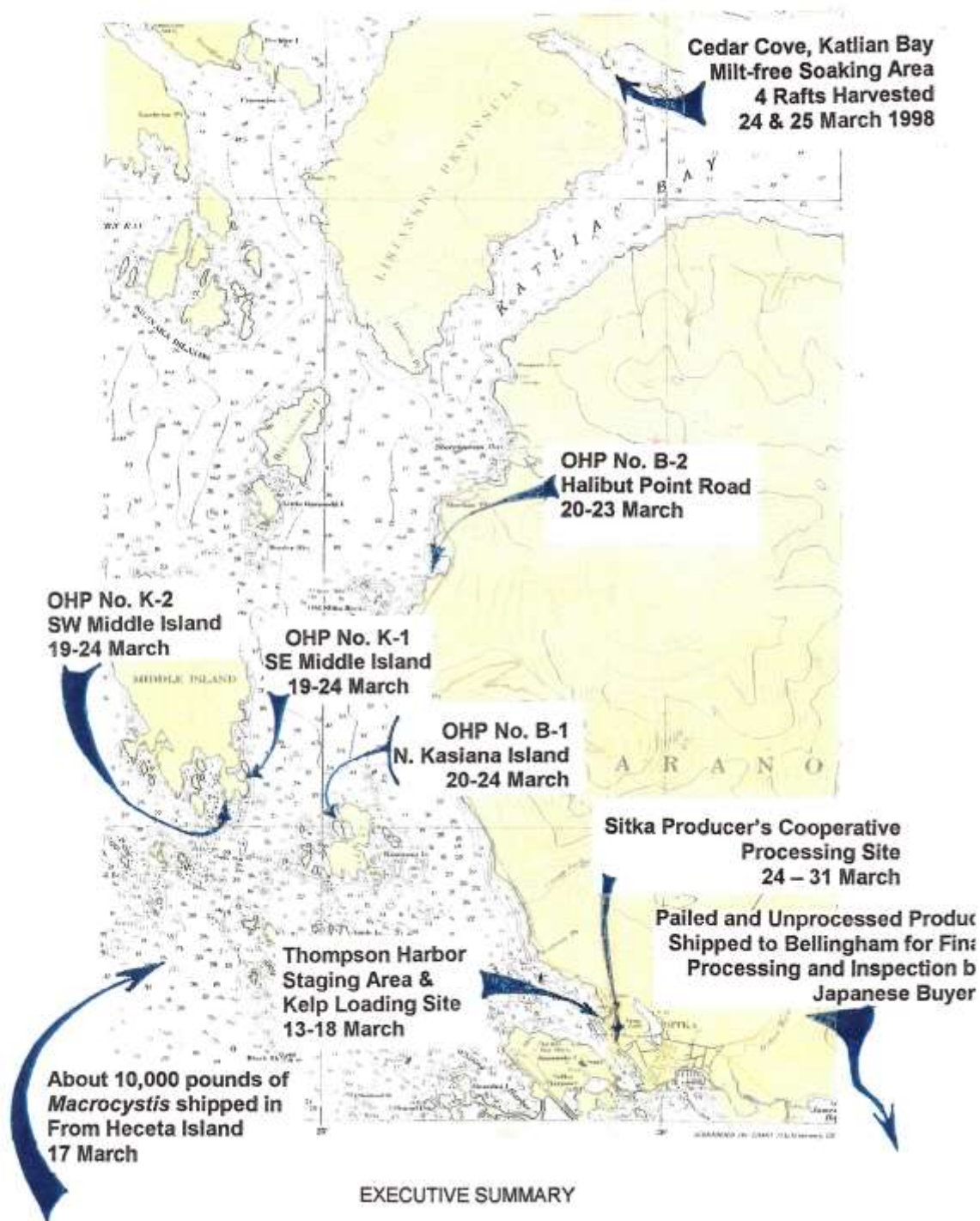
The Sitka community derived economic benefits from the fishery through short-term jobs and the direct purchases of goods and services. Raw fish taxes and city sales tax paid on local goods also contributed to the community's springtime economy.

**WHAT'S NEXT?**

The collective benefits of the open harvest platform method were largely realized in the 1998 experimental fishery. Fishery resource conservation merits were demonstrated, subsistence and other fisheries proceeded without disruption, and the roe on kelp produced was of acceptable quality. The funds generated in the fishery covered ADF&G management costs and offset most of PGA's expenditures.

Paul Gronholdt and Associates is satisfied with the overall outcome of the fishery. The PGA team feels that lessons learned in 1998 can contribute to a strategy of refining production standards for Sitka Sound roe on kelp which will lead to greater market niche security in the future.

Sitka Sound Herring Roe on Kelp Experimental Fishery  
Open Harvest Platform Method  
Paul Gronholdt and Associates March 1998





**Sitka Sound Herring Spawn on Kelp  
Open Harvest Platform Method  
Report on Experimental Fishery Results  
1998 Season**

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**Discussion and Final Remarks**

**Attachments**

- A. Board of Fisheries Proposal Number 441
- B. Sitka Spawn on Kelp Test Fishery Team Members (PGA) and Contractors
- C. PGA Kelp Harvesting Permit and Kelp Harvest Logs
- D. Detailed Chronology of Test Fishery (Field Records)
- E. March 1998 Interim report: individual rack logistics
- F. Sitka Producers Cooperative Tote Record and ADF&G Fish Tickets
- G. Roe on Kelp Production Report, Kanaway Seafoods
- H. Sitka Tribe of Alaska letter to the Board of Fisheries
- I. ACR 16, submitted to the BOF by Alan Ottness 25 September 1998





Sitka Sound Herring Spawn on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

## Section 1. Introduction and Background

This report describes the methods used by Paul Gronholdt and Associates in conducting the Sitka Sound Herring Spawn on Kelp Experimental Fishery. The results of the 1998 fishery and some of the challenges encountered in adapting the Open Harvest Platform fishery technique and marketing strategy to Sitka Sound are discussed.

### Background

The Sitka Sound herring fishery has allowed only sac roe seine gear since entry to the fishery was limited in about 1977. Along the West Coast of North America, this singular gear type management regime for herring harvest is unique to Sitka (Garza 1996). In accordance with the Limited Entry Act optimum number provision, the CFEC established the maximum number of participants in the Sitka sac roe fishery at about 50 permits.

#### 1.1 Diversification of the Herring Fishery

In early 1998, about one third of the Sitka Sound sac roe seine permit holders organized an effort to support the development of a spawn on kelp alternative to the Sitka Sound sac roe herring fishery. Under the leadership of a native of Sand Point, Paul Gronholdt and Associates submitted BOF Proposal No. 441. The proposal sought to "Allow Sitka Sound herring sac roe purse seine permit holders the option of using open pound racks to harvest herring roe in the form of kelp in lieu of or in addition to using purse seines."

Purse seine permit holders in the group, contracted biologists and consultants went before the Board of Fisheries in support of proposal No. 441 in Sitka (January 1998).

The Board of Fisheries took no action on proposal 441, but acknowledged the potential conservation and economic benefits of the gear type. In order to explore several aspects of the proposed open harvest platform method, the Board requested that the Alaska Department of Fish and Game conduct an experimental fishery. ADF&G responded by designing an experimental fishery and soliciting bids for the 1998 season.

#### 1.2 Experimental Fishery Terms

Terms established by the Department for conducting the experimental fishery required that the contractor deposit a \$64,000 bond with the department, have at least two years experience in the spawn on kelp fishery, and have an appropriate vessel, platforms and other equipment necessary for achieving the test fishery goals. To further ensure a successful outcome, the Department also required that the contractors provide a harvest, marketing and processing plan, and hold a letter of agreement with a licensed Alaskan seafood processor for handling the roe on kelp product.

The goals of the test fishery were to first produce a sufficient quantity and quality of roe on kelp from four rafts to generate \$336,000 in product sales to pay department and contractor's expenses. The project would serve as an opportunity for ADF&G to conduct resource research on both kelp and herring, as well as observe the fishery for environmental impacts, gear conflicts and subsistence interactions.



Sitka Sound Herring Spawn on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

Paul Gronholdt and Associates were awarded the test fishery contract on February 25, 1998. Comprised of 13 Sitka Sound herring sac roe permit holders, about 40 crewmembers, and five consultants, the "PGA team" commenced with mobilizing their vessels and open harvest platforms for the fishery in early March.



Sitka Sound Herring Roe on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

## Section 2.0 Results of the 1998 Experimental Fishery

From early March through mid-July, Paul Gronholdt and Associates carried out the experimental fishery, processing and marketing of roe on kelp as described in their contract with the Alaska Department of Fish and Game. The results of this coordinated effort were beneficial economically as well as informative to community members, the experimental fishing team and the ADF&G research and management staff.

The PGA team successfully transferred California OHP fishing technology to Sitka Sound, and adapted the method to Alaskan conditions. Sitka residents were able to observe the entire process and learn directly the logistics involved and impacts resulting from the alternative gear system. ADF&G researchers implemented their research plan with few changes, and obtained data upon which to base their analysis of the fishery.

Finally, the overall quantity and quality of the roe on kelp yielded by this fishery were very good, considering it was a first attempt at the fishery in Alaska. Sales of the product were sufficient to reimburse most of the PGA team's costs, and covered the entire ADF&G experimental fishery research budget.

Detailed records of activities involved in the experimental fishery are noted in the chronology in attachment D. The following section highlights the manner in which each facet of the fishery was conducted, notes any discrepancies from the original plan, and briefly explains the results of each phase of the operation.

### 2.1 Staging for the Test Fishery

The PGA team began staging for the test fishery in early March. Robert Glenovitch shipped his custom-manufactured aluminum roe on kelp rafts and other equipment from Bellingham to Sitka on the F/V Alicia Jo. Crew from the St. Zita assembled the rafts and moored them in New Thompson Harbor on March 13.

About 60 fish totes were stored on a barge leased from Excalibur Drilling. Located inside the Thompson breakwater, the barge served as a useful platform for the kelp stringing and open harvest platform loading operation.

### 2.2 *Macrocystis* Kelp harvest

High quality *Macrocystis* kelp is essential for the production of excellent herring roe on kelp. Desirable kelp blades are at least 6 inches wide and 20 inches long, with smooth margins, no holes and free of encrusting growth.

Although *Macrocystis* grows from Dixon Entrance to Icy Strait, mature blades meeting these harvest criteria in the early spring are not abundant throughout the plant's Alaskan range. On March 13 and 14, Darrell Kapp and crew inspected *Macrocystis* kelp beds around Baranof Island. No kelp of sufficient blade size and abundance could be located near Sitka Sound.

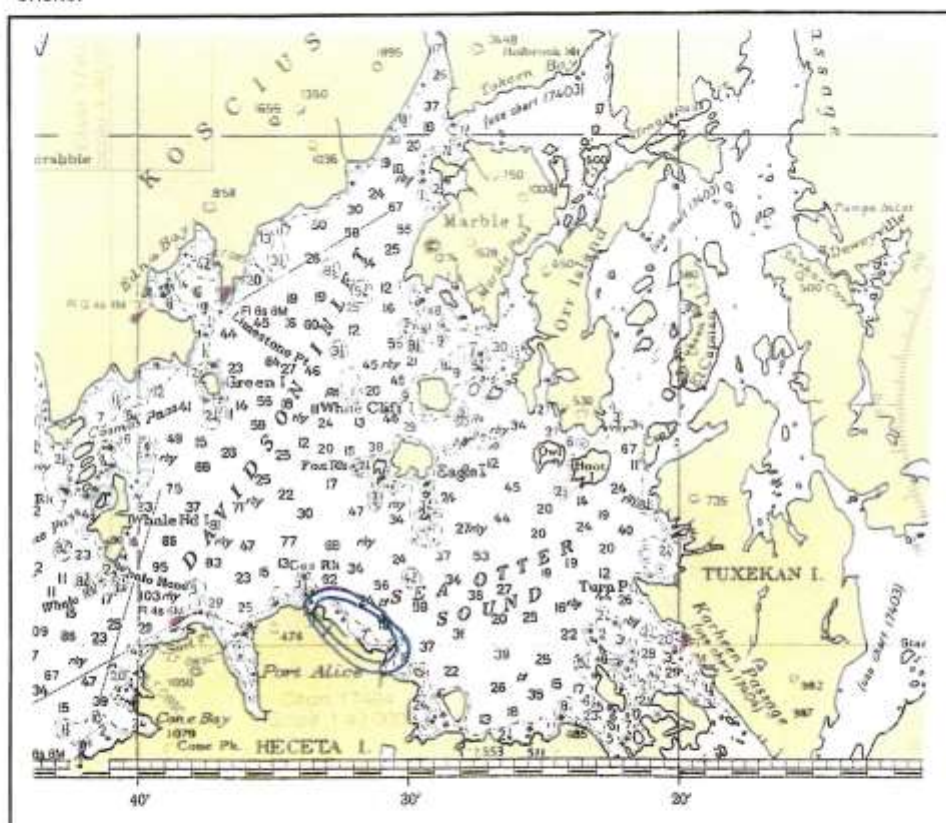
Kapp conferred with Bill Davidson about the situation and coordinated a team of kelp harvesters to travel further south. On March 15, Jim Beaton directed his crew on the F/V Starrigavan to depart Sitka for Sea Otter Sound. Kelp quality expert Warren Westrom



# Sitka Sound Herring Roe on Kelp Experimental Fishery Report Paul Gronholdt and Associates March 1998

screened several kelp beds and located a supply of mature *Macrocystis* about 120 miles south of Sitka. Beaton notified ADF&G of the harvesting site and schedule.

On March 16, PGA's biologist and two ADF&G technicians flew to the North end of Heceta Island where they rendezvoused with the Starrigavan crew. Two fishermen that live on Heceta Island were contracted to gather kelp for the fishery, and joined the team onsite.



**Figure 2.1** Nautical chart indicating the location of the North Heceta Island kelp bed. Nine people harvested about 4,000 *Macrocystis* fronds from this site in about 10 hours.

The following individuals participated in the kelp harvest at North Heceta Island:

- Johnny Weyhmiller and crew
- Rob Miller, Sitka
- Charley Frisbee, Hydaburg
- Lee Morris, Captain  
F/V Starrigavan
- Steve Frago, Crew, F/V Starrigavan
- Becca Johnston, Crew, Starrigavan
- Michelle Ridgway, PGA Biologist
- Warren Westrom, Kelp Quality Advisor  
(Nicole DuClose & Eric Parker, ADF&G)

Sitka Sound Herring Roe on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

The kelp team commenced with the *Macrocystis* harvest on the morning of March 16, and completed the task by 1900 hours that evening. All kelp used in the test fishery was harvested from one bed located at North shore of Heceta Island, about two miles SE from Gas Rock, at 55°49.43 North 133° 31.145 West (Figure 2.1). This site lies within ADF&G statistical area 103-90.

In accordance with contract stipulations Warren Westrom directed the kelp team to weigh and inventory each tote of kelp and maintain the kelp harvest logbook. Pursuant to ADF&G kelp harvesting regulations 5 AAC 37.300, the crew harvested *Macrocystis* from small skiffs by hand, removing only the upper portion of the fronds.

Westrom oversaw that kelp harvested met quality control standards. Frond sections taken were about six to eight feet long. The four to five newly formed blades at the tip of each frond are unusable and were trimmed off to reduce mucilage buildup in the totes.



Photograph 2.1 *Macrocystis* kelp harvesting in Sea Otter Sound, North shore of Heceta Island. Kelp blades are in good condition, but slightly smaller than preferred. PGA's biologist, Michelle Ridgway was monitoring the harvest and observing for impacts to the kelp resource and effects on marine mammals and birds in the area. 16 March 1998

A total of 10,236 pounds of kelp was harvested and transported in 40 standard fish totes. The ADF&G research team estimated that this consisted of 4,080 fronds with an average of 16 blades per frond, or 65,280 total blades.

The Starrigavan crew lashed the totes of *Macrocystis* to the deck, and kept them lidded during transport. Weather was rough through Chatham Straits, but the kelp arrived at Thompson Harbor in excellent condition.





Sitka Sound Herring Roe on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

Kelp Harvest Impacts

The ecological effects of the kelp harvest were difficult to gauge. As there was no provision made for conducting a quantitative study of the kelp prior to harvest, both ADF&G field technicians and PGA's biologist made general observations of the harvest.

Ridgway photographed the kelp bed prior to and following harvest. Neither observations made on the day of harvest nor the photographs reveal that the bed had been diminished in any way. ADF&G biologists revisited the kelp harvest site on April 9, and reported that "there was no obvious impact on the kelp bed". Ridgway revisited the site in July and September. Based upon surface observations only, she did not see obvious signs of deterioration in individual plants or in the bed.

Even when harvesting fronds in the kelp bed, it was difficult to detect any reduction in the kelp biomass. However, it was obvious to all pickers when high quality blades became scarce in an area. Upon completing the harvest, we felt that we had taken most of the higher quality fronds from the kelp bed – which is about 1/3 square mile in size.

We assume that impacts to the kelp bed from this harvesting included some damage to the individual plants which were "pruned". Because only one or two fronds were taken from each plant, the *Macrocystis* plants will likely recover the lost biomass by summer's end.

Ridgway observed seals, cormorants, marbled murrelets, gulls and numerous seaducks in the bay during harvest activities. Three seals remained in the kelp while skiffs collected fronds, it did not appear as if they were disturbed at all. Other than the likely short-term disruption to the fish and invertebrate populations dwelling under the kelp canopy, it does not seem as if this year's level of harvest resulted in long-term damage to the kelp bed or the ecosystem it supports.

Kelp User Conflicts

Potential conflicts between the Spawn on Kelp Experimental Fishery and subsistence harvests of kelp or SOK on the West Coast of Prince of Wales Island was cited as a concern prior to the fishery (Comments to the Board of Fisheries by Dolly Garza, 1998).

The PGA team harvested kelp for the experimental fishery only at the Heceta Island site, many miles away from the traditional kelp harvest areas used by the communities of Craig, Klawock Sitka and Hydaburg (see figure 1 in the Executive Summary). There were no concerns or conflicts reported as a result of the kelp harvest.

**2.3 Open platform fishing**

The Starrigavan crew arrived with the *Macrocystis* in the evening on 17 March. The PGA core team of seine boat skippers and advisors met to review the kelp loading procedure and by 2100 hours mobilized their crews to begin work. The ADF&G staff were notified of project activities and were on site as the kelping procedure began.

Four seine boats anchored rail to rail in Thompson Harbor, near the Excalibur barge. In windy, cold weather, 37 crew members, boat captains and four contractors engaged in stringing and loading kelp on racks for 6 1/2 hours, completing the task at about 3 a.m.

Sitka Sound Herring Roe on Kelp Experimental Fishery Report  
Paul Gronholdt and Associates March 1998

The kelp loading procedure involved the following steps:

- *Macrocystis* fronds were removed from totes and trimmed to 6-foot lengths
- A seine lead weight was attached to the bottom end of the frond, and a length of gangion line to the top end of the frond. The gangion was made off to a piece of groundline. Fronds were spaced about 1.5 meters apart along the kelp line.
- Lines bearing fronds were "coiled" into totes, much like baited longline gear.
- The Merlin crew took fully loaded totes to the open harvest platforms, and "shot" the lines into place. From 37 to 43 lines were placed on each of four platforms, each line bearing about 28 fronds.
- Kelped platforms were then allowed to settle for about a day in Thompson Harbor



**Photograph 2.2** Loading kelp; late night in Thompson harbor. Two assembly lines involving about three dozen-crew members prepared kelp fronds for suspension in the open harvest platforms. Weights and gangions were attached to each frond, and then fronds were attached to kelp lines on the four platforms. 3,858 fronds were fished in the experimental fishery.

# Sitka Sound Herring Roe on Kelp Experimental Fishery Report Paul Gronholdt and Associates March 1998

On March 19, vessels in the PGA fleet slowly towed two loaded kelp racks to fishing sites designated by Darrell Kapp with input from Subsistence Coordinator, Mike Miller. Details of the logistics involved in handling each rack during the fishery are provided in the Chronology (Attachment D), and in the interim report (Attachment E).

Rack K-1 was anchored in a small cove on the SE end of Middle Island, and K-2 was secured in a nameless cove on the SW end of Middle Island in the evening of 19 March (Figure 2.2). On 20 March, racks B-1 and B-2 were towed to anchorages on the north end of Kasiana Island and to North Magic Island. Later on the 21<sup>st</sup>, raft B-2 was tied to a private dock located on Halibut Point Road, where it remained for the rest of the fishery.

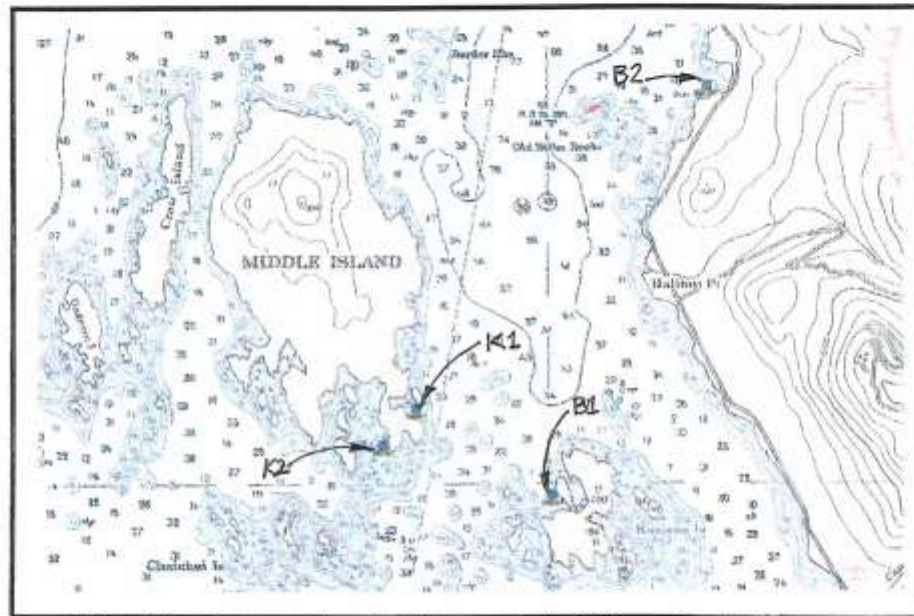


Figure 2.2 Location of each open harvest platform used in the SOK experimental fishery

All rafts were adorned with two to four blinking warning lights and signs displaying ADF&G permit numbers. Each raft was positioned near a steep beach, and tied to shore with one or two stout shorelines. The corners of each raft most distant from the beach were secured using 50-pound longline style anchors.

## Spawn Deposition

1998 was an excellent spawning season in Sitka Sound. ADF&G reports that spawning in the Sound occurred from March 19 through April 12, with major spawning from March 21-25. Spawning events began earlier than usual, and over 65 miles of shoreline was spawned upon.

We observed spawning at every raft by the 21<sup>st</sup> of March. Schools of male and female herring milled around the rafts and, seemingly responding to the same cue, females



Sitka Sound Herring Roe on Kelp Experimental Fishery Report  
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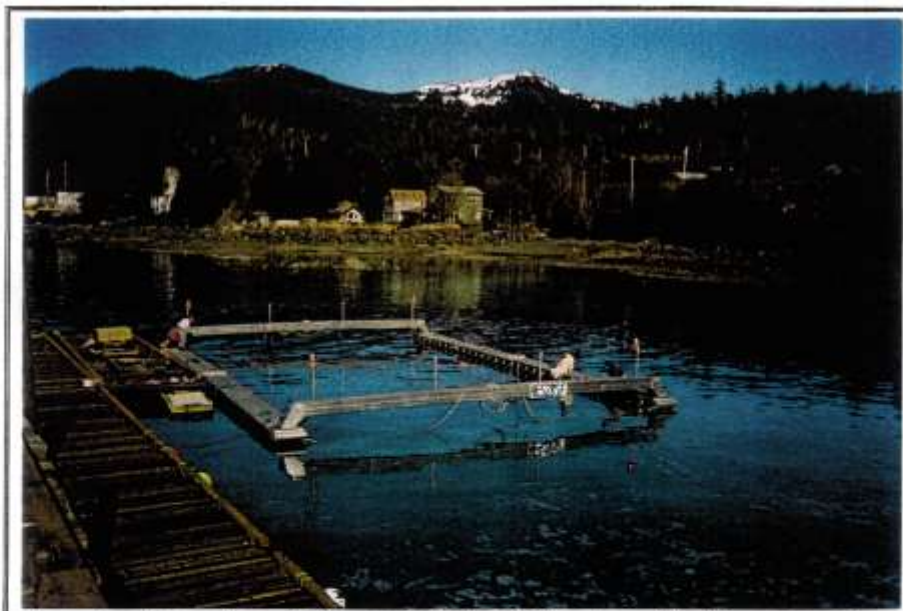
began to deposit eggs on the kelp blades. Like a seamstress sewing stitches, each female laid her eggs on blades in rows. Males released milt in the rack areas on an intermittent basis. On March 23<sup>rd</sup>, the PGA team and ADF&G managers observed that most of Sitka Sound was a sea of milt.

While the gear was fishing, two dozen members of the PGA team shared the task of monitoring rafts for spawn deposition, observed and responded to subsistence fishing activities in the area, and generally guarded the platforms (see Chronology). Each raft was tended each night they were in place. The crew monitored spawn deposition at each site, and eventually lowered most kelp lines to improve blade exposure to spawning herring.

During the fishing period, representatives of the Alaska Department of Fish and Game, USFWS Protection, members and staff from the Sitka Tribe, and members of the general public from Sitka visited the roe on kelp rafts.

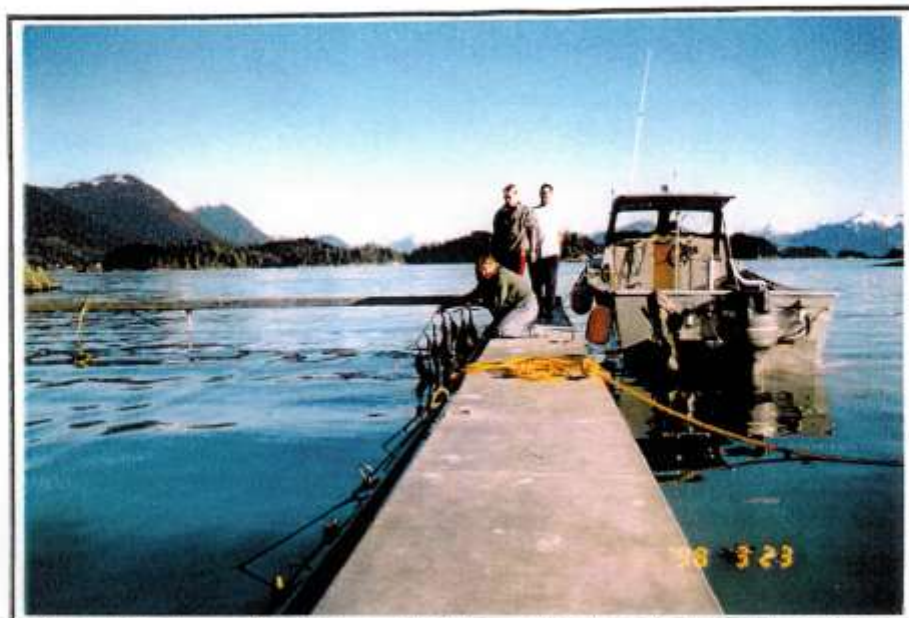
By March 23, all racks had from one to four egg layers deposited on most blades. At about 8 o'clock p.m., the Ryan D. Kapp towed platform number B-2 from the Halibut Point Road site about five miles to Cedar Cove in Katlian Bay. The raft was tended overnight while the product soaked to cleanse away excess milt.

On the 24<sup>th</sup>, the remaining three rafts were towed to Cedar Cove for soaking. Weather was calm, and product loss from the rafts during the tow was negligible. Seine boats towed the rafts at a speed of about 2 knots.



**Photograph 2.3** Open Harvest Platform fishing! The PGA team inspected platforms several times daily. If upper blades were not receiving spawn deposition, ganglion extension lines, or "drops" were used to lower the kelp lines in the water column.

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**Photograph 2.4** The condition of *Macrocystis* blades was closely monitored. Cool temperatures, high saline water and early spawning in Sitka contributed to the preservation of kelp quality.

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## 2.4 Roe on Kelp Product Harvesting

Five seine boats and their captains and crew gathered in Cedar Cove for harvest of the first rack on the morning of the 24th of March. We first worked with the ADF&G research team to tag randomly designated fronds for sampling and set up ADF&G's sampling station. About 30 people engaged in harvesting and packing roe on kelp for about three hours.

The team removed each frond from kelp lines, then snapped all blades off of the stipe or stem, stacked blades carefully and then packed them into standard-sized fish totes. ADF&G collected every marked frond for sampling and maintained counts of all fronds harvested. Totes full of roe on kelp blades were loaded on to the deck of a seiner, and taken to the Sitka Sound Producer's Cooperative for processing.

The crew harvested the three other racks in this manner on March 25th. Weather was cold, windy, and sleeting occasionally. The harvest proceeded without incident of note. About 50 totes of roe on kelp were delivered to the SPC plant by evening of the 26th.



Photograph 2.5 Paul Gronholdt's F/V St. Francis positioning a kelp platform in Cedar Cove following a two-hour tow from the fishing grounds. The roe on kelp was allowed to soak in the salt-free waters for 12 to 24 hours prior to harvest to reduce product adhesion.



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Photograph 2.6 Product harvesting begins. Teams of kelp handlers worked from the decks of two seiners moored to the platform. ADF&G researchers have set up a sampling station on the aft deck of the Robert Glenovitch's St. Zita.



Photograph 2.7 Kelp "clotheslines" were hauled in and fronds removed gently to avoid breakage. Two to four herring egg layers were deposited smoothly on most blades.

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Photograph 2.8 Deck crews removed weights and gangion lines from each frond, then snapped blades from the attachment point to the stipe, leaving the pneumatocyst attached to the stipe.



Photograph 2.9 Herring Roe on Kelp Harvest: Blades were gently placed into fish totes for transit to Sitka Producers Cooperative, about two hours away.



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Photograph 2.10 Herring Roe on Kelp Harvest: Ungraded *Macrocystis* blades were stacked carefully to prevent egg loss during packing.



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## 2.5 Roe on Kelp Processing

### Sitka Producer's Cooperative

Seine boats in the PGA fleet delivered about 50 totes of fresh *Macrocystis* blades laden with herring roe to the Sitka Producer's Cooperative on the 24th and 25<sup>th</sup> of March. 12,332 pounds of product were landed on 24 March, and 42,135 pounds were landed on the 25 March, for a total of 54,467 pounds of "raw" roe on kelp. Kanaway Seafoods Fleet Manager, Sandy Souter monitored the landings, recording weights of individual totes by raft. Per contract arrangements, landings were made on an ADF&G experimental fishery gear card (Attachment F).

An SPC crew of 8 to 14 people worked under the direction of Kanaway Seafoods SOK Operations Manager, Richard Walsh. This crew worked for about 7 days at the Sitka Plant. Crew size varied because some workers tended to intermittent deliveries of longline-caught fish to SPC. Processing at SPC would have continued an additional week or so, but specialized processing at an outside plant became necessary.

As described in PGA's Processing Plan, the crew proceeded to introduce a 100% brine solution into each tote following delivery. After initial brining, heavy depressors and lids were placed on the product, and totes were rotated until each attained the desired level of brine saturation. Absorption of salts from the brine is dependent upon kelp thickness and egg deposition consistency, and is therefore variable. Over the course of about 24 hours, totes were treated with two to four brining sessions.

Brined blades were trimmed, graded, drained in baskets and then weighed. Blade pieces were placed in pails by grade, and topped with a scoop of fine salt (Photographs 2.11 – 2.15). The target net packing weight was 34 pounds of product per pail. The crew filled each pail with brine and shook loose any air bubbles, then they sealed the pails with airtight lids for storage.

The product was held at about 20° Fahrenheit during all phases of storage, domestic shipping and transport overseas. The high salt content of the product precludes damage from freezing at this temperature.

### Silt Setback

During the course of processing, the Kanaway team discovered signs of silt in the product. They inspected further and found that two rafts had been contaminated with very fine layers of silt either on the kelp or mixed in with the egg layers.

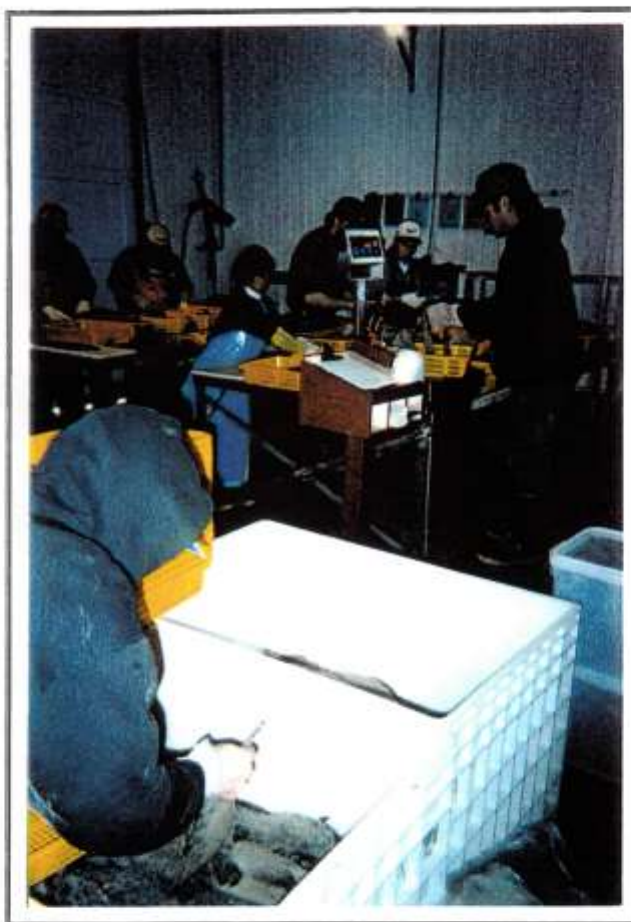
Silt contamination is unacceptable in the marketplace. Since SPC did not have the proper equipment for inspecting and cleaning silt from the product, the crew sealed brined totes from two silty rafts and shipped them south.

The crew palletized the processed pails and loaded them with brined totes into containers for shipment to Bellingham. Alaska Outport Transportation Association and Northland Services, Inc. transported totes of unprocessed product and pails of processed product from Sitka to Home Port Seafoods plant in Bellingham on April 11, April 20 and May 7.

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Kanaway Seafoods, Inc. Bellingham, Washington

Eight to ten crew processed Sitka Sound roe on kelp for about ten days. According to Richard Walsh, about five days of this time was consumed addressing the siltation problem. The cleaning effort was worth while, as it effectively salvaged the product and improved both grade and price.



**Photograph 2.11** About 50 totes of SOK were harvested from Sitka Sound during the test fishery. Blades were treated with a saline solution until the product was saturated with brine. The Sitka Producer's Cooperative crew processed SOK from two rafts, and shipped totes from the other two rafts to Bellingham to remove fine silt with specialized equipment.



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Photograph 2.12 Kanaway Seafoods processing experts guided Sitka Producers' Cooperative crew members in trimming and grading Roe on Kelp produced in the 1998 test fishery.



Photograph 2.13 Roe on Kelp grades are based upon kelp quality and size, and on thickness and uniformity of the herring spawn deposited on each blade. Sitka Sound SOK was of very good quality, and was well received by consumers in Japan.

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Photograph 2.14 The SPC crew drained and then weighed SOK into 17-pound baskets. Graded product was then consolidated into pails for shipment to Japan.



Photograph 2.15 Pailed SOK was topped with a scoop of fine salt, air bubbles were "bounced" out of the pails, and then each pail was lidded. This brined product was held at 20 degrees during storage and shipping. 57,038 pounds of roe on kelp was produced during the test fishery.



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## 2.6 Product Quality Assessment and Marketing

Sitka Sound "Kazunoko Kombu" was graded both in Sitka at the SPC plant and at the Home Port Seafoods plant in Bellingham. Richard Walsh was responsible for directing all grading. All graded and pailed ROK was held at the Bellingham Cold Storage for buyer evaluation.

In advancing along the learning curve through the execution of this experimental fishery, some SOK grading criteria were not met. These are parameters which influence the ultimate price for the product and which can be improved upon in the future:

- Some *Macrocystis* kelp was too young and exuded mucilage such that eggs did not adhere well.
- The size of most of the blades used was slightly smaller than ideal – broader blades would have been more acceptable.
- The egg coverage was generally very good, some was not consistent
- Kelp "melting" – some kelp showed signs of deterioration at processing time.
- Silt was present in some of the product, even after extensive washing
- Egg sloughing, or "peeling" occurred in a small percentage of the product, and is related to kelp deterioration

### Pacific Coast SOK Quality Comparison

Kanaway's Souter and Dan Nomura offered the comparison that Sitka Sound product was better than the quality of SOK harvested in California – which is graded at a scale about two levels lower than was PGA's product. Within the region, Souter and Nomura estimated that PGA's SOK not quite on par with BC production. Nomura indicated that the Sitka Sound area resources are of sufficient quality to potentially produce BC grade SOK, but the BC fishermen's technique is more refined for dealing with Northern roe on kelp production.

In Nomura's opinion, Hoonah Sound SOK is still top quality in southeast Alaska – so superior that it fills a unique niche for extremely thick, or "jumbo" SOK in the Japanese gift market. Both in quality and in price, Sitka Sound product quality is between that of Craig/Klawock and Hoonah Sound.

### Product Purchase by Japanese Importers

Upon inspection of the lots in late June, Kanaway Seafoods concluded negotiations on the sale of the product with the Japanese buyers. Their apprehensions regarding the purchase of product from a new location and some concern over residual silt in the roe inspired a very thorough inspection of product quality. The buyers concluded that most of the product was of good quality for the target market. Buyers purchased the entire volume.





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Sales of the product were finalized on 29 June 1998. Dan Nomura provided the following information on weights and grades assigned to the product.

Summary of Kanaway Seafoods Final Production and Settlement Report Prices and Total Values Reported are Net, Less 3.3% Processor Tax				
Grade	Weight (pounds)	Percentage By Grade	Price per Pound	Total Value (\$\$\$)
1	11,821	21%	\$ 7.58	89,603.18
2	30,166	53%	\$ 5.78	174,359.48
3	9,078	16%	\$ 4.40	39,943.20
4	1,461	3%	\$ 3.21	4,689.81
5	1,233	2%	\$ 1.19	1,467.27
5P	1,137	2%	\$ 0.45	511.65
5T	2,142	4%	\$ 0.45	963.90
TOTALS	57,038	—	(avg. \$5.46/lb)	\$261,538.49

Once in Japan, Sitka Sound Roe on Kelp was fairly well received by retail buyers and consumers. The Japanese companies processed the brined ROK into a variety of products for distribution. Most of the product was sold to the more common restaurant and grocery store markets. According to Dan Nomura, a small amount of Sitka Sound product was sold through the gift market. Buyers reported that the products were broadly accepted alongside production from other locales (B.C., Hoonah and Craig).

#### Product Prices

Marketing consultant Dan Nomura conceded that the prices paid for the Sitka Sound product were lower than hoped for, but were acceptable considering market circumstances. The seafood market in general has been suffering from the low value of the Japanese yen, an unfavorable exchange rate, and the flagging Japanese economy. Since roe on kelp is a specialty market, it has suffered more than have markets for more essential goods. These factors, coupled with product unfamiliarity, yielded suboptimal prices for a developed product, but satisfactory prices for first year production.

Japanese importers have expressed an interest in purchasing SOK from Sitka Sound in the future. Nomura feels that this interest will support increased production of SOK from southeast Alaska. However, several significant hurdles must be addressed.

Based upon his recent research in Japan, Nomura has concluded that the corporate gift market for roe on kelp is shrinking, but prices remain high for the smaller volumes purchased in this market. Markets for thinner product, like that produced in Sitka Sound, are slowly expanding. A trend that began in 1997, in which a decrease in import prices led to expanding the market for these lower priced products, continues.

Most British Columbia and California producers currently cater to this market. About 1.5 year's of production from these sites is currently on inventory. Nonetheless, Nomura feels that if Sitka Sound SOK methods were refined to more specifically meet market



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needs for a thinner, everyday Kazunoko kombu product, there will be opportunities for building markets for more SE Alaskan SOK.

General factors influencing the current market climate for Kazunoko Kombu and which will influence market expansion opportunities in the future include:

- Supply quantity of competitive sources of Kazunoko kombu
- Product quality
- Economic conditions in Japan
- Market niche development
- Pricing
- Inventory/Carryover
- Level of marketing effort and effectiveness

These issues present a challenge to the future of roe on kelp fisheries in Alaska. Experts such as Dan Nomura and Alaskan seafood marketing authorities are optimistic that implementing a well-devised strategy for producing consistently high-quality product to fit the needs of the thinner style Kazunoko Kombu market will yield favorable economic results in the long term.





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### Section 3. Subsistence Fishery Interactions

Prior to the test fishery, subsistence stakeholders in the Sitka Sound region expressed apprehension regarding the potential impacts of the SOK fishery on traditional and customary uses of *Macrocystis* kelp, herring stocks and the roe-on-hemlock-branch personal use harvest. In response to these concerns, the Board of Fisheries directed ADF&G to require the contractor to carefully monitor the test fishery and endeavor to ameliorate any conflicts that might arise.

*Macrocystis* for the experimental fishery was collected miles away from traditional harvest areas near Craig, Klawock, Hydaburg, and Sitka. Therefore, there was no competition for kelp with the traditional and customary harvesters of kelp or roe on kelp in those areas.

PGA hired Mike Miller, member of the Sitka Tribe of Alaska, to serve as liaison between subsistence harvesters and the test fishery team. Miller participated in ADF&G planning discussions and tribal meetings before the 1998 herring season. Community members, city officials and others interested in the fishery contacted Miller before, during and after the season to have general questions answered from his local perspective.

Miller remained onsite in Sitka Sound during every phase of the test fishery (Photograph 3.1). In addition to monitoring subsistence activities in the Sound during the fishery, Miller also assisted subsistence harvesters who wanted to suspend hemlock boughs near or on the HROK platforms (Photographs 3.2, 3.3).

Miller communicated daily with PGA's onsite biologist, Michelle Ridgway. Miller received no reports of conflicts or complaints from members of the subsistence community at any time. Subsistence harvesters setting branches or harvesting wild spawn on kelp near the platforms said they had no difficulty working around the structures or attendant vessels. Excellent harvests were reported by subsistence harvesters collecting branches set on, near or miles away from the HROK platforms during the 1998 season (Photograph 3.4).

Concerns and questions from locals regarding the test fishery were also directed to ADF&G, the Sitka Tribe of Alaska leaders and staff, and to the City of Sitka. A summary of responses to the test fishery from these organizations follows.

#### Alaska Department of Fish and Game, Sitka Office

Dave Gordon, Bill Davidson and Doug Mecum directed the 1998 Test Fishery in Sitka Sound. They indicated that members of the Sitka community were interested in the fishery, and frequently asked questions about the new gear type. But no one from the public expressed having conflicts with the fishing team or their gear during the test fishery.

"Neither the department nor the contractor's liaison with PGA received any complaints from individuals participating in the subsistence harvest of SOK or roe on branches." Doug Mecum, Reporting to the Board of Fisheries in Wasilla, October 1998

#### Sitka Tribe of Alaska (Also see Attachment H)

Reported by Jude Pate, Legal Counsel for the Sitka Tribe of Alaska  
and Jack Lorrigan, Biologist for the Sitka Tribe of Alaska

Jude Pate observed the test fishery through daily boat excursions to the test fishing grounds, and filmed many aspects of the fishery. He also solicited and documented the responses of Tribe members to the fishery during and following the season.

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Pate reported that the Sitka Tribal members involved in subsistence harvesting in 1998 reported "no conflicts with the 1998 test fishery participants or their gear". He conveyed that all test fishery participants were diligent in communicating with the Tribe, and are considered to have done an excellent job at conducting the test fishery.



**Photograph 3.1** Paul Gronholdt, President of PGA, aboard the Tug Thunderbird – observing subsistence fishing near the test fishery platforms. All members of the PGA team shared in the responsibility of avoiding conflicts with traditional fisheries and adjusted test fishery operations as needed per PGA's subsistence liaison's guidance.



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Photograph 3.2 Sitka Sound area subsistence fisherman setting hemlock trees in an active herring spawning area for gathering herring eggs on branches at North Kasiana Island, March 1998. The trees were anchored with rocks and tied to trees on shore. Within three days these trees were covered with 4-5 layers of herring spawn.



Photograph 3.3 Subsistence fisherman, setting hemlock trees for subsistence harvest of roe on branches near an open harvest platform used in the test fishery. Miller and others fishing branches in the area had successful harvests and indicated that the platforms were not an obstacle to their gathering of herring eggs.

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**Photograph 3.4** Sitka Sound area subsistence fishermen enjoyed an excellent harvest of herring eggs on hemlock branches in the 1998 season. With over 60 miles of spawn in the Sound, there was a multitude of sites available near town for traditional egg gathering.



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## Section 4.0 Environmental Considerations

The conservation merits of the open harvest platform roe on kelp fishery were evidenced during this experimental fishery. Relative to sac roe and closed pounding fisheries, there are some clear resource conservation benefits. It is beyond the scope of this report to analyze these conservation aspects or to assess environmental impacts incurred during the OHP fishery.

Rather, we report here our observations made during the fishery, and mention the research undertaken by the Alaska Department of Fish and Game. Some commentary on potential impacts of this fishery and contrasts with environmental concerns arising in other herring fisheries are discussed briefly.

### Alaska Department of Fish and Game Research

In order to learn as much as possible about the OHP fishing method and the impacts of this experimental fishery upon herring stocks and the *Macrocystis* resource, ADF&G initiated a research plan during the spring 1998 season. Department statistician, Dave Carlisle, designed a randomized sampling program to estimate the total amount of herring eggs deposited on kelp blades. These data were used to estimate the total amount of herring "participating" in the OHP experimental fishery.

Sitka management biologists and their crew carried out the sampling plan, and other southeast technicians conducted the egg deposition counts. In addition, ADF&G staff was present for every phase of the fishery. They recorded field observations, which might provide insight into impacts of the OHP method (Photographs 4.1 – 4.3).

In their preliminary report, ADF&G estimated that 10.5 billion eggs were deposited on kelp blades in the fishery. Based upon results of their fecundity study, ADF&G estimated that 104 tons of herring were utilized in the fishery. The conversion of herring to pre-brine weight of SOK is 0.26.

ADF&G reported that PGA harvested about 10,000 pounds (5 tons) of *Macrocystis* kelp, which included 4,080 fronds, each with an average of 16 blades, for a total estimate of 65,280 blades. The Sitka Area Management Biologist and his staff visited the harvest site on the north shore of Heceta Island about six weeks following the harvest. They reported that "there was no obvious impact on the kelp bed".

ADF&G's detailed findings from this research and data analysis are forthcoming. A summary of their preliminary research results is presented in the Progress Report to the Board of Fisheries, dated October 16, 1998.

### The *Macrocystis* Resource and Kelp Bed Ecosystem

Southeast Alaska harbors extensive beds of *Macrocystis* kelp, but the biomass, distribution, and ecological role of these kelp beds is not fully known. The increase of herring roe on kelp fisheries in recent years has created competition for high quality kelp blades that are mature at the time of herring spawning activity. After conducting the test fishery, the PGA team feels that there is good quality kelp in southeast to support the growth of the roe on kelp fishery. However, a strategy may be needed to ensure that every fishery group has access to high quality kelp at the time of their fishery.





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In other Pacific coast regions with active roe on kelp fisheries, harvesters and managers have encountered times when high quality kelp was not available in sufficient abundance to support the fishery. This dearth of kelp has been due in part to factors including inter-annual variability, low light in spring months leading to poor early season growth, and possibly overharvests. Kelp scarcity has been experienced in Canada and California. In order to continue producing roe on kelp in some areas, British Columbia recently allowed roe on kelp "pounders" to harvest kelp in marine parks.

We do not yet understand the impacts of *Macrocystis* harvests on the plant, the kelp bed, or the marine community this habitat supports. We feel that the selective harvesting of fronds from some plants did not impact the kelp bed extensively. Because the harvest occurred early in the growing season, it is likely that emergent understory fronds replaced the biomass harvested by late summer.

Ridgway's observations of the kelp bed in July and September suggested that this was so. Non-quantitative observations indicated there were no gaping holes or obvious signs of damaged kelp in the bed that was harvested.

Marine species flying or swimming near the kelp beds at the time of harvest did not seem to be disturbed. We presume that the use of outboard engines, coupled with surface canopy frond removals would cause motile species to relocate – at least temporarily. The broader ecological implications of this kelp harvest are not yet known.

#### Herring Resources and Health

Both environmental and conservation benefits of the passive OHP fishing method for the herring stock are numerous. As described in Mundy, *et al* 1998, we observed herring volitionally swim into the kelped platforms and voluntarily spawn on hanging kelp blades. The fish were never herded and the PGA fishing team did not observe any signs of the herring being stressed when spawning. Even in the presence of crewmembers on the rafts, herring proceeded with spawning at a leisurely pace. It was assumed that most fish spawning on OHP kelp had already spawned elsewhere, or were destined to do so following deposition on the "fishing" blades.

Thus, herring "participating" in the OHP fishery contribute to the genetic diversity and gamete abundance of the Sitka Sound herring stock, and they swim away to return for potential spawning in subsequent years. The effects of this fishery on herring therefore seem to be in the removal of an unknown percentage of each spawner's gamete production.

Some other potential environmental consequences of the OHP fishery include:

- Herring seem to be attracted to the shelter provided by the platforms – their migration or spawning on wild habitat may be altered.
- Anchors used to secure the rafts may have some impact on the benthic community, but this is assumed to be minimal.
- Some blades may break away from the platforms, and eggs may slough off of blades to the seafloor. This may attract scavengers, and the sloughed eggs may not hatch. The impact of this is assumed to be negligible.



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Based upon observations made during the experimental fishery, these impacts appear to be minimal and have no inordinate or long-lasting environmental consequences.

**Comparison of Environmental Consequences in other Herring Fisheries**

In contrast to other herring fisheries and unlike other roe on kelp methods, the Open Harvest Platform method is not lethal to herring or *Macrocystis* kelp. The OHP manner of harvesting results in a removal of gametes from the herring genetic pool and partial removal of biomass from individual kelp plants.

Herring involved in the traditional sac roe fishery are either killed, or are held while roe composition is determined, and then released. Ultimately, they are considered dead.

Seined herring introduced into closed herring roe on kelp pounds are allowed to spawn for several hours to several days. Because there is no reasonable means of counting the number of fish in the pounds, Commercial Fisheries Director, Doug Mecum, noted that "we are unable to regulate the amount of herring in each (closed) pound" (January 1998 BOF Meeting, Sitka).

This situation has led to fishermen exceeding the herring quota in these fisheries on numerous occasions. Additionally, some fishermen and observers of the fishery report that the fish are clearly stressed while in the pound, and upon release.

Recent research in Prince William Sound has confirmed that closed pound herring have a high rate of viral infection. In 1998, this VHS virus was isolated from the water of three pounds in PWS in sufficiently high levels to transmit the disease to nonimmune fish.

Wild harvests of roe on kelp in Alaska involve the taking of whole seaweed plants using knives, rakes, or by handpicking. In contrast, *Macrocystis* is not killed or dislodged during harvest for use in the OHP fishery.

Because herring are neither crowded nor stressed when using the OHP method, the environmental consequences incurred in the sac roe and closed pound fisheries are not at issue. This sublethal take of both herring and kelp resources is more beneficial to the genetic integrity of those species and likely contributes to potential sustainable yield of those resources.



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Photograph 4.1 The Alaska Department of Fish and Game, Commercial Fisheries Division developed a rigorous research plan to gather data on the experimental fishery.



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## Section 5.0 Economic Review

Although the 1998 experimental fishery was, by design, not a profitable endeavor for PGA, a review of the costs and benefits resulting from the fishery are useful for predicting the potential scale of economic impact the alternative fishery could have on Sitka. Benefits derived by the Sitka Community through the 1998 experimental SOK fishery included direct income to locals through short-term jobs, and moneys generated through taxes and retail sales of goods and services.

This section is not intended to serve as an economic analysis of the spawn on kelp industry. Figures on the revenues generated in the fishery are in section 2. Comparisons of the economic yields in various herring fisheries are reviewed in Mundy, Sharr and Ridgway, 1998. This section provides a synopsis of the types of expenditures incurred in the fishery, and an approximation of the labor force involved in each phase of the operation.

### Sitka Area Jobs

An average of about ten local people worked at Sitka Producer's Cooperative processing roe on kelp for about seven days. They were paid through contractual arrangements between SPC and PGA. Four other southeast residents were contracted by PGA to assist with the kelp harvest (two from Sitka, two from the Craig area).

Eight to ten people worked on further processing at the Home Port Seafoods plant in Bellingham for ten days. Had the product not been silted, or if proper equipment had been available in Sitka to handle the silt-cleansing task, this employment would have been based in Sitka.

Two consultants from the Lower 48 and two consultants from southeast Alaska were hired by PGA for onsite monitoring of the fishery, to serve as local liaisons, and to report on performance of the test fishery. These contracts were for one to several weeks in duration.

In order to monitor and conduct research on the experimental fishery, ADF&G tasked southeast staff with project-specific duties. This resulted in additional work for field technicians, statisticians, lab technicians, and Sitka area management staff. Most of the additional staff time and associated costs were compensated for by the contractor's required surety bond with the State.

### Overall Labor Force Involved in the Fishery

Fishing by the Open Harvest Platform method is very labor-intensive. Since most captains and crew were new to this fishery, the test fishery involved a great number of people for some parts of the operation. Over time, crews may become somewhat more efficient, but the sophisticated nature of the fishery requires a great deal of attention to detail, and always requires more labor than the direct harvest herring fisheries.

Based upon logbooks entries and notes made by PGA team members, the table below summarizes the estimated number of workers involved in each phase of the test fishery in 1998.



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Estimated Number of People Involved in the Experimental Fishery				
Phase of the Fishery	Number of People Involved *			Approx. Number of Person-Days*
	Total	PGA Crew	Contractors Or plant crew	
Mobilization and Staging	6	6	0	24
Kelp Harvest	9	4	5	11.25
Loading Racks w/ Kelp	37	31	6	27.75
OHP Fishing	10	8	2	40
Towing Rafts to Harvest	8	8	0	8
Harvesting in Cedar Cove	30	30	0	45
Harvest/Transport to SPC	6	6	0	9
Processing at SPC	8-12	0	8-12	70
De-Mob in Sitka	4	4	0	4
Processing at Home Port	8-10	0	8-10	90
Loading/Shipping to Japan	3	0	3	0.75
Marketing/Sales Effort	1.5		1.5	30
TOTALS	—	—	—	359.75
*Est. person days = average number of people X estimated # days worked on that task				

#### General Expenditures in Sitka

Beyond the investment in equipment and costs to mobilize in Sitka, the PGA team incurred some expenditure while conducting the fishery in Sitka. These general costs included the following:

- Barge Lease
- Lodging for some PGA members
- Restaurants and groceries: (About 30 people for six days)
- Fuel for five vehicles and some vessels
- Three rental cars
- Taxicabs
- Entertainment
- Harbor Fees
- General purchases -- supplies

The community of Sitka received some benefits through city sales taxes. And 3% of the total ex-vessel price of the roe on kelp product was paid to the State in raw fish taxes. A percentage of this contributes to the City of Sitka's community apportionment of statewide raw fish taxes.





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## Discussion and Final Remarks

The 1998 Experimental Fishery proceeded largely as anticipated. PGA's collective experience, as well as good weather and an early herring spawn contributed to the overall success of the fishery.

The roe on kelp suffered from the silt infiltration, but otherwise the product met expectations reasonably well. The price paid was sufficient to cover most costs for conducting the experimental fishery and associated research and management. The PGA team feels that the quality of product can be improved with increased monitoring of seawater conditions prior to and during the fishery.

The Sitka Community did not experience any resource user conflicts as a result of the fishery. Commercial and subsistence harvesters appeared to be either unaware of the fishery, or content with the manner in which it was conducted in Sitka Sound.

Within the scope of the PGA team's ability to observe impacts on the marine ecosystem, the fishery met many of the anticipated environmental and conservation goals. Neither fish nor kelp plants were likely killed in this "harvest".

### Final Remarks

The quantity of Sitka Sound SOK available for harvest in the future is dependent upon the abundance of spawning herring and *Macrocystis* kelp and management decisions regarding their exploitation rates. The Alaska Department of Fish and Game, the Commercial Fisheries Entry Commission and the Board of Fisheries will determine resource assessment, quotas and allocation issues.

The overall market outlook is challenging. Experts conveyed that implementation of a strategic plan to tailor roe on kelp production to fit emerging market trends is necessary to ensure SE Alaska's product a niche in this specialty market arena. Participants in the 1998 experimental fishery concur that meeting these market needs with more refined Sitka Sound roe on kelp product is plausible. The PGA team feels that pursuing this market potential and hence diversifying the herring fishery management regime will provide broader economic benefits from this resource to the people of southeast Alaska.

ASSESSMENT OF *MACROCYSTIS* BIOMASS, QUALITY, AND HARVESTING EFFECTS  
IN RELATION TO HERRING ROE-ON-KELP FISHERIES IN ALASKA



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Regional Information Report<sup>1</sup> No. 1J99-24

Alaska Department of Fish and Game  
Division of Commercial Fisheries  
Juneau, Alaska

July 1999

<sup>1</sup> The Regional Information Report Series was established in 1987 to provide an information access system for all unpublished divisional reports. These reports frequently serve diverse ad hoc informational purposes or archive basic uninterpreted data. To accommodate timely reporting of recently collected information, reports in this series undergo only limited internal review and may contain preliminary data, this information may be subsequently finalized and published in the formal literature. Consequently, these reports should not be cited without prior approval of the author or the Division of Commercial Fisheries.



## ABSTRACT

Interest in harvesting *Macrocystis* kelp for use in herring roe-on-kelp (ROK) fisheries is increasing, but information on the biology and ecology of kelp is limited for southeast Alaska. This is a report of a four month pilot study to evaluate the amount of kelp available for harvest and the recovery rates of kelp from harvest. Estimating the amount of kelp available consisted of first estimating the total abundance of kelp in a survey area and second estimating the biomass of available and desirable kelp. The total biomass was estimated by surveying the surface area of kelp beds in selected regions on the west coast of Prince of Wales Island. Randomly selected index beds were surveyed to determine kelp density, and samples were measured and weighed to estimate the average weight of kelp. An estimated 225,225 tons of *Macrocystis* kelp were found in the survey area. The harvest of kelp for ROK is highly selective. By comparing harvested to available kelp, it was found that blades at least 14 cm in width and fronds with a high proportion of desirable blades were selected. The proportion of blades and fronds meeting these selection criteria was estimated for the index beds, and the biomass of desirable kelp was estimated to be 32,663 tons or about 14% of the total kelp biomass in April. The growth in kelp canopy was rapid from March to April, with March canopies about 45% smaller than April canopies. Therefore, the biomass of desirable kelp in March was about 18,000 tons. Even if kelp harvests increase 10 times over present levels, the harvest will only represent about 3% of the lowest estimate of the biomass of desirable kelp.

There were few significant effects of experimentally harvesting kelp canopies in March and/or April. Kelp beds that were experimentally harvested at both times or only in April had shorter fronds and possibly fewer large fronds and fronds per plant. This experiment was monitored only one month after the last harvest, so there may not have been sufficient time for the cut kelp to fully recover. This preliminary experiment indicates that kelp recovers rapidly from harvesting in the spring.

## INTRODUCTION

Kelp beds are a conspicuous element of the outer northeast Pacific Coast (Foster and Schiel 1985). All kelp belongs to the order *Laminariales* (*Phaeophyta*), and are made up of holdfasts, stipes, and blades. Some of the kelps produce floats that buoy them to the surface, these are known as the canopy forming kelps. The giant kelp, *Macrocystis* sp., is a well known canopy forming genus that occurs in much of the coastal Pacific Ocean. The terminology associated with *Macrocystis* is fairly complex as is the morphology (Figure 1), consisting of an attached holdfast with numerous fronds supporting numerous blades. *Macrocystis* often grows in thick beds that form a unique and important habitat.

Kelp beds play an important role in nearshore ecosystems in at least three ways (Duggins 1988). Kelp beds greatly increase the habitat complexity, increase sedimentation rates, and contribute large amounts of fixed carbon to the ecosystem (Duggins 1988, Duggins et al. 1989). Kelp beds provide as much as 15 m<sup>2</sup> of surface area for every square meter of substrate (Wing and Clendenning 1971), providing habitat for infaunal and epifaunal organisms (Duggins 1988). In addition, several species such as fish, mysids, and shrimp utilize kelp beds extensively (Coyer 1984). Juvenile and young-of-the-year fish may exhibit particularly strong, positive relationships with kelp beds (Carr 1991, Ebeling and Laur 1985). Kelp beds can also be significant sources of production, contributing large amounts of carbon in the form of attached plants, drift plants, particulate organic matter (POM), and dissolved organic matter (DOM) (Duggins et al. 1989). This carbon production is not limited to kelp beds as some of the unattached plants drift outside of the bed with some pieces drifting miles from the source bed. In areas with lush kelp beds, about 50% of the total carbon in some fishes and birds is derived from kelp primary production (Duggins et al. 1989). Finally, kelp beds alter the flow of water in and around the bed (Jackson and Winant 1983). This altered flow results in higher sedimentation rates that may increase suspension feeding and recruitment of planktonic larvae. Altered flow caused by kelp beds may also increase the availability of planktonic food sources, such as barnacle cyprids, to resident kelp bed fish (Gaines and Roughgarden 1987).

The morphology of kelp blades has been shown to be dependent upon water movement in many kelps (Norton 1969, Druehl 1978, Norton et al. 1982, Koehl and Alberte 1988). In low flow areas, blades generally have more undulations, are larger, wider, and are not split. *M. integrifolia* shows similar plasticity in growth form (Druehl 1978, Hurd et al. 1997). This plasticity in growth form is highly functional. Undulations dramatically increase drag forces, resulting in higher blade mortality in high flow regimes, but in low flow areas the undulations serve to increase nutrient uptake by initiating turbulent flow around the blade (Hurd et al. 1997). Also, larger blades are better able to gather light but cannot withstand the drag and accelerational forces exerted by wave action (Denny et al. 1985).

There has been interest in harvesting kelp for various purposes on the Pacific Coast of North America since at least 1911 (Foster and Schiel 1985). In California, about 100,000 tons of kelp are harvested annually for various products. Harvesting north of California has been sporadic, with few large scale commercial harvests. In British Columbia and Alaska *Macrocystis* kelp is harvested to support the herring roe-on-kelp (ROK) fishery. Since the price paid for the end product is dependent upon the quality of the kelp blade, harvesting kelp for ROK is highly selective. In particular, fronds with many wide blades are desirable.

The research described here was initiated due to interest in harvesting kelp for a roe-on-kelp (ROK) fishery near Sitka, Alaska. A proposal was made by commercial harvesters to the Alaska Board of Fisheries in 1996 to allow Sitka Sound herring sac roe purse seine permit holders the option of using open pound racks to harvest herring roe on kelp. This would be in lieu of, or in addition to, using purse seines. The board took no action on the proposal at their 1997 meeting, but requested that the department conduct



an experimental gear test fishery. The department conducted the test fishery in 1998 focusing on management issues related to the pound fishery and the gear. A second test fishery was conducted in 1999 primarily to fund the kelp research described here, as well as to revisit some issues related to fishery management. A second proposal to allow for a roe-on-kelp fishery in the Sitka area will go before the board at their 2000 meeting.

An understanding of the abundance and dynamics of giant kelp, *Macrocystis* spp., is essential to manage the use of this alga for existing and emerging herring ROK fisheries. Kelp harvests in Alaska are currently being managed with limited knowledge of kelp abundance, growth, or recruitment. In conjunction with other roe-on-kelp fisheries, the Sitka Sound open harvest platform herring roe-on-kelp test fishery presents the possibility of greatly increasing the harvest pressure on *Macrocystis* kelp resources. At least two pieces of information are needed to properly manage kelp harvests in Alaska, 1) the amount of kelp that is available and desirable for harvest, and 2) the effects of harvesting on kelp beds and associated communities. This report provides a preliminary assessment of the abundance of *Macrocystis* kelp resources in Alaska. Also, the results of an experiment assessing the short term effects of harvesting on kelp beds and the ability of kelp beds to recover from harvests are reported.

## METHODS

### *Standing Crop Estimates*

#### **Aerial Surveys**

Aerial surveys of kelp beds on the west coast of Prince of Wales Island were conducted between March 23-29, 1999 (Figure 2). The coastline was surveyed by Scott Walker, an experienced ADF&G herring spawn recorder. During the flight all significant *Macrocystis* kelp beds were marked in red pen on black and white charts by the surveyor, recording the approximate outline of each bed. The area around Duke Island and Tree Point was surveyed on 11 June 1999.

The resulting maps with marked kelp beds were analyzed to ascertain the surface area of kelp beds. The original maps were scanned into digital format (Figure 3), and an image that included only the red "kelp beds" was produced from the original scanned image (Figure 4). These two images were produced with Adobe PhotoShop. Using an image analysis program (Optimus), the original image was used to scale the red only image, using landmarks of known length. An averaging procedure (5x5 pixels) was applied to the red-only image to eliminate small lines, numbers, and letters within the red patches. The red patches were then automatically outlined, and any remaining unwanted "holes" or other images were removed by hand. The image analysis program then determined the total area of mapped kelp beds and the data were downloaded to Excel for analysis. The Duke Island and Tree Point survey was not analyzed due to relatively low *Macrocystis* abundance and limited time.

## Index Beds

One index bed was randomly selected from each subdistrict surveyed, resulting in a total of 11 index beds. To select a bed, a randomly placed point was located in each subdistrict. The bed that was closest to the point and was at least 20 m<sup>2</sup> in surface area was selected. To estimate the growth of beds during the spring, these index beds were photographed during the March aerial survey and on April 28, 1999. Photographic methods were consistent between dates and the altitude was recorded for each photograph. For each index bed, a pair of photographs, one each from March and April, were selected based upon similarity of photograph angle, direction, and altitude. The photographs were scanned into digital format and analyzed using Optimus image analysis program. All canopy forming kelp was outlined by hand using the image analysis program and the total area of kelp plant canopy (excluding water area between fronds) was obtained. This is not the same measure of the surface area of beds obtained from the hand-drawn bed maps in March which includes water area between fronds.

The April photographs were calibrated using a photograph of an object of known dimensions taken from the same altitude. The March photographs were calibrated by measuring a distinctive object in the April photograph and using the same object as a scale in the March photograph. This procedure insured that each pair of photographs were calibrated similarly. If the calibrations were off, they were off by the same amount for each date so between date comparisons could still be made.

To estimate the length of fronds and the density of plants and fronds, four index beds were visited between April 19-24. The density of kelp in each bed was estimated by scuba divers. Six transects were oriented perpendicular to the long axis of the bed and placed at even intervals along the length of the bed. If transects were longer than 20 m, then 20 m long sections were sampled at the inside edge, outside edge, and approximate center of the transect. The total length of the transect was recorded as well as the distance between transects. The start and end depths of each transect were also recorded. Divers swam along transect lines and counted the number of large (>1.5m) and small (<1.5m) *Macrocystis* fronds for each holdfast encountered within one meter of the transect line. Every tenth frond was measured for length starting with the tenth frond.

## Commercially Harvested Bed

Kelp was harvested for the Sitka Sound open harvest platform test fishery from a bed on the northeast side of Port Alice in Sea Otter Sound (Figure 2). This bed was surveyed by scuba in March just after the harvest and again in April as part of the index bed survey. The methods of survey were similar to the methods used for the index beds. The total harvest taken from this bed was recorded.

## FronD Biomass

To estimate the average weight of fronds, 22 fronds of varying length were weighed and measured. The fronds were cut into 1 meter sections starting from the tip and working towards the base. The weight and section number were recorded for each section. At the base, the length of the final piece was also recorded. Thus, the total weight and length of each frond could be determined.

### **Total Biomass Estimates**

The total biomass was estimated by multiplying the total surface area of kelp beds (March) by the average density of large fronds (April) and the average weight per frond (April). The average weight per frond was estimated by multiplying the ratio estimator of average frond weight/average frond length from the weighed fronds by the average length of fronds in the index beds. The relationship between frond length and weight was linear and had a zero intercept, so using a ratio estimator was appropriate. The surface area of the beds drawn in March was assumed to remain constant through April for purposes of this calculation.

An estimate of the variance associated with the total biomass estimate was generated by combining variance estimates for both frond density and average frond biomass. Frond density averages and variances were weighted by bed size (Cochran 1977). The variance associated with the average frond biomass was calculated using the methods of Barnett (1991).

### **Estimated Versus Harvested Biomass**

Two small beds were surveyed by scuba divers to assess the accuracy of the biomass estimates. The beds were small ( $<150\text{m}^2$ ) enough that an entire frond count census was completed for each bed in one day by two scuba divers. Every tenth frond was measured for length. After surveying, the canopy was harvested from both beds and the total frond biomass was harvested from one bed. All harvested material was weighed. Thus, the estimated biomass from scuba sampling could be compared to the actual biomass obtained by harvesting.

### ***Desirable Biomass***

#### **Blade Morphology**

The morphology of individual kelp blades was examined to assess the desirability of kelp. Three fronds from each of ten systematically located points in the Port Alice bed were collected before any commercial harvest occurred. The tenth, fifteenth, and twentieth blades from the apex were detached and measured. The youngest free blade was counted as blade number one. The total length and maximum width of each blade were measured. In addition, the number of holes in the blade, the general condition of the blade, and the presence or absence of epiphytes and silt were recorded. The harvested kelp was also sampled. Forty haphazardly selected fronds were collected from the harvested kelp and three randomly chosen blades were sampled. The morphology of blades sampled before harvest was compared to commercially harvested blades to determine the criteria used to select blades sampled.

Fronds were collected from the four visited index beds to determine the proportion of desirable blades over the entire region. Fronds were collected over dive transects. The initial goal was to collect a frond at three locations (inside edge of bed, outside edge of bed, and in the center of the bed) along each transect,



but time constraints often reduced the sample size. Blades were then sampled in the same manner as the blades in the harvested bed.

Frond quality was assessed by comparing the number of desirable blades out of the three sampled blades between fronds from various locations. As with blade morphology, frond selectivity was determined by comparing the fronds available in the harvested bed before harvest to the fronds actually harvested. The proportion of fronds desirable over the entire region was then determined by using the sampled fronds from the index beds.

### **Biomass Estimates**

The biomass of desirable kelp was estimated by multiplying the total area of kelp beds by the density of desirable fronds by the average weight of fronds harvested. The density of desirable fronds was estimated by multiplying the total frond density by the proportion of fronds that were available and the proportion of fronds desirable obtained from the index bed surveys. Available fronds were defined as those that were at least 5.3 m in length. This definition was needed to eliminate those fronds that did not reach the surface (average depth of about 3 m) and have enough additional length to harvest (2.3 m, obtained from the average length of harvested fronds).

The variance component of the biomass estimate was obtained by combining variance estimates from the average weight of harvested fronds and the average density of available and desirable fronds.

### ***Effects of Harvesting***

### **Experimental Design**

The goal of this experiment was to assess the impact of harvesting on kelp beds. Three kelp beds in the Craig area were used (Figure 2), and four 20 m transects were permanently established in each bed perpendicular to the depth contours. Kelp density was estimated using the techniques described above for index beds for each study plot before any treatments were assigned.

All transects were marked, numbered, and surveyed between 24-25 March 1999. After the initial survey, the experimental treatments were assigned to the transects. There were four experimental treatments, 1) March harvest (early), 2) April harvest (late), 3) March and April harvest (early+late), and 4) an unmanipulated control. Each of the four treatments were randomly assigned to the four plots in each bed. After treatments were assigned, the plots receiving the early and early+late treatments were harvested by cutting all fronds around the mean low water mark. An 8-meter wide swath centered on the transect line was harvested. The late and early+late plots were similarly harvested after sampling in April. All plots were resurveyed using the standard dive measurements on 24-26 April and 15-16 June 1999.

## RESULTS

### *Standing Crop*

#### **Aerial Surveys**

The aerial survey identified 751 distinct beds from eight regions on the west coast of Prince of Wales Island (Table 1). The average bed size over the surveyed area was 46,936 m<sup>2</sup> ranging from 415 to 886,774 m<sup>2</sup>. More than 35 million square meters or 3,524 hectares of kelp beds were surveyed (Table 1). It should be emphasized that this is only a partial survey of *Macrocystis* kelp on the west coast of Prince of Wales Island. It is estimated that this survey represents about 60% of the kelp in this area. In addition there are kelp resources around Baranof Island, Sumner Strait, Kuiu Island, and Duke Island but the area of these resources is unlikely to exceed the kelp beds on the west coast of Prince of Wales Island. In 1913, Cameron (1915) estimated there are about 45,300 acres (18,332 hectares) of kelp in southeast Alaska, but only a small portion of this was *Macrocystis*.

#### **Density Estimates**

Many characteristics of kelp populations at the index beds were evaluated using the information from scuba surveys (Table 2). The selection of Port Alice was heavily biased and the scuba surveys reflect this bias. The density of plants, large fronds, and frond length were all greater at Port Alice compared to the index beds (Table 2). The density of small fronds and the number of fronds per plant at Port Alice were both within the range observed at index beds. The overall density of individual plants was about 0.34/m<sup>2</sup> (excluding Port Alice data). There were more large fronds (mean of 2.44/m<sup>2</sup>) than small fronds (0.46/m<sup>2</sup>) at all index beds. The number of fronds per plant ranged between 3.8 and 12.5 with an average of 9.3. Excluding Port Alice, frond length was relatively constant between sites and averaged 6.1 meters.

The average depth of the 4 index and 3 experimental harvest beds was 3.28 m below mean low water (MLW), ranging from 1.25 to 6.13 m below MLW. The depths at Port Alice were greater than at the index beds ranging from 4.27 to 9.45 m below MLW and averaging 7.08 m below MLW.

#### **Frond Biomass Estimates**

There was a linear relationship between the length of a frond and its weight (Figure 5). Length was a good predictor of weight, explaining 88% of the variation in frond weight. Since a plant of zero length cannot have any mass, the intercept must be zero. In this case a ratio estimate (average weight:average length) is a simple method to estimate average frond biomass from a sample of lengths. The ratio generated from the data in Figure 5 is 0.39 kg/m. The average length of fronds at the surveyed index beds was 6.11

meters, so the average weight per frond was 2.37 kg. ( $0.39 \text{ kg/m}^2 \times 6.11 \text{ m}$ ). The variance about this estimate was 0.065, calculated using Barnett's (1991) method.

### **Total Biomass**

The estimated biomass of kelp in the areas surveyed was 204,319,652 kg (225,225 tons) with an 80% confidence interval of  $\pm 43,802,512 \text{ kg}$  (48,284 tons). Based upon the weight per unit area, this estimate corresponds to "very thin" beds reported by Cameron (1915) and the June harvest yields of Coon (1982).

### **Estimated Biomass Versus Harvested Biomass**

The estimated biomass at both beds was greater than the actual harvested biomass (Table 3). At Pt. Ildefonso, only the canopy was harvested, so the biomass below the harvest level was left. This site, however, was only 2-3 m deep, so the amount that was left was minimal. Not all of the harvested material was weighed as some fragments drifted away before weighing.

### ***Desirable Biomass***

### **Blade and Frond Quality**

The harvest of kelp for the roe-on-kelp fishery was highly selective with both blades and fronds being chosen for high quality. According to Richard Walsh (personal communication) of Home Port Seafoods in Bellingham, Washington, the two most important factors in grading kelp blades is the overall health and the blade width. For the 1999 SOK fishery, kelp blades in the 14-16 cm size range or higher were selected relative to the blade widths available in the bed (Figure 6). At Port Alice, blade widths in the bed did not change between March and April (Figure 7), but blade areas increased from March to April, indicating that blades grew in length but not width (Figure 7). The width of blades varied between the index beds (Figure 8). Eagle Island had narrow blades with few blades wider than 16 cm. Those blades that were wider than 16 cm were often torn and broken. There was a higher percentage of both narrow (<14 cm) and wide (>20 cm) blades at Harmony Island relative to Port Alice. The few samples taken at Balena Island indicate that most blades were in the 14-18 cm range. At Port Real Marina, blades were very wide with almost all blades more than 16 cm wide, but most blades at this site were covered with fine silt or damaged by grazers.

To evaluate the quality of fronds, the three blades sampled on each frond were rated as desirable or undesirable. A desirable blade had to be at least 14 cm wide, have few small holes, no large holes, free of silt, and not torn. Virtually all of the harvested fronds from Port Alice used in the test fishery had 2 or 3 desirable blades of the 3 sampled (Figure 9), and the percentages used in these two categories were



greater than the available fronds in the Port Alice bed. In the index beds, 38.7% of blades had 2-3 desirable fronds. Most of these desirable fronds were found at one index bed.

#### Available and Desirable Biomass

To determine the biomass of kelp available and desirable for kelp harvest, both the density of large fronds and the weight per frond needed to be adjusted for the selection of fronds. The density of fronds available for harvest was calculated by multiplying the total large frond density by 51.25%, which is the proportion of fronds that were longer than 5.3 m. The threshold length of 5.3 m was deduced as follows: The average depth of beds surveyed by scuba in this study was rounded down to 3 m below M.L.S., and this length was added to the average length (2.3 m) of the cut segments of fronds harvested for the Sitka ROK fishery. That is, a frond must be at least 3 m to get to the water surface and then be an additional 2.3 m to make the frond worth harvesting. Thus, the estimated density of available fronds was the average frond density, (2.45 fronds/m<sup>2</sup>) (Table 2), times the proportion of fronds longer than 5.3 m (0.5125) with a result of 1.26 available fronds/m<sup>2</sup>. The proportion of desirable fronds in the index beds was 38.7%. Therefore the density of available and desirable fronds is 1.26 available frond/m<sup>2</sup> times 0.387, equal to 0.486 available and desirable fronds/m<sup>2</sup>. The average weight of harvested fronds was 1.73 kg/frond. Thus, the biomass of available and desirable fronds in the surveyed area in April 1999 was 29,631,711 kg with an 80% confidence interval of  $\pm 20,161,522.8$  kg, or about 14% of the total kelp biomass.

#### Growth of Beds - March to April

The canopy cover within all index beds increased from March to April (Table 4, Figure 10). The percent increase in cover ranged from 12% to 311% with a mean increase of 82%. Thus, beds in March will average about 45% less canopy than beds in April. If there is a linear relationship between canopy cover and biomass, then the April biomass estimate can be appropriately reduced to obtain a March biomass estimate. Decreasing the April biomass estimate by 45% results in a total biomass in March of 112,375,808.4 kg and a desirable biomass in March of 16,297,441.3 kg.

#### Effects of Harvesting

Over three months there were few detectable effects of harvesting upon *Macrocystis* plants or beds (Figure 11). To account for variation in the starting densities or lengths, differences between the June sampling date and the pre-harvest March sampling date were statistically analyzed (Table 5). Average frond length was significantly lower on plots harvested later in the season compared to the early harvest or control plots (Figure 11F, Table 5). There were also marginally significant decreases in the density of large fronds and the number of fronds per plant in the plots harvested in both March and April (Figure 11C, E, Table 5). There were no detectable effects of harvesting on the densities of plants, small fronds, or juveniles (Figure 11A, B, D, Table 5).



## DISCUSSION

The total biomass estimate is made up of aerial surveys of the extent of kelp beds, estimates of frond densities, and estimates of frond weight. Each of these three components can contribute to errors in the biomass estimation. Any error inherent in the aerial survey methods was not quantifiable, so the estimate of total kelp bed area was treated as a census with no error in the analysis. There may have been errors in recording the extent of individual beds during the surveys with some beds being overestimated in size and others underestimated. Also, there may have been errors in identifying *Macrocystis* beds. Some *Nereocystis* beds may have been included in the survey, resulting in an overestimate of *Macrocystis* area. Conversely, some *Macrocystis* beds may have been identified as *Nereocystis* beds, resulting in underestimation of *Macrocystis* bed area. Without performing multiple surveys over a single area, it is impossible to estimate these sources of error. A more accurate and efficient method of estimating the area covered by *Macrocystis* needs to be developed. Aerial photography from belly or wing mounted cameras using infrared film would eliminate errors in canopy area estimation and has been used in British Columbia (Foremen 1975) and in Alaska (M. Ridgway, Oceanus Alaska, personal communication).

The error estimates for total biomass were obtained from a combination of the estimates for frond density and frond weight. Frond density estimates made up about one third of the error estimate for total biomass while the frond weight estimates accounted for the remaining error. The disparity between the error contributions of frond density and frond weight indicate that relatively more effort should be devoted to sampling frond weight. A more efficient approach would be to have fewer transects per bed (about 5), sample more beds, and sample about 30 more fronds for weight and length. However, the precision of the sampling was within 22% of the mean with 80% confidence intervals, indicating a reasonable estimate of the total kelp biomass in the surveyed area.

For the two small beds examined, the biomass estimated by scuba surveys was higher than the harvested biomass. Part of this difference was due to handling the fronds in the process of weighing, resulting in the loss of an unknown amount of material. Only the canopy at Point Ildefonso was harvested, so some of the estimated biomass was left on the sea bottom. With these sources of error, the harvested biomass may have been within the range of variation of the estimated biomass. More beds need to be surveyed and harvested to determine if the scuba surveys consistently overestimate the available biomass.

Estimating the amount of kelp desirable by the ROK fishery proved difficult. The quality of kelp blades is mainly dependent upon blade width and blade health, defined by the absence of holes, tears, and debris. In addition, fronds with a high proportion of desirable kelp blades are selected over other fronds. Since blade and frond quality can only be assessed by field sampling and the estimates for the proportion of desirable kelp reflects sampling from only four beds, the precision of the biomass of desirable kelp was quite low ( $\pm 68\%$ ). More beds need to be surveyed to make more accurate estimates of desirable biomass.

Blade morphology is dependent upon wave exposure and currents (Druehl 1978, Hurd et al. 1997), so it may be possible to predict the quality of blades in kelp beds if the exposure of the bed is known. The water flow regime for any particular area depends upon many factors including the fetch, bottom topography, local land masses, and the wind regime. It may be possible to sample blades and fronds in a variety of kelp beds varying in exposure and relating the blade morphology to a derived exposure index. The health of kelp blades also seems to be indirectly dependent upon water flow. Both grazing and fouling seems to be greater in protected areas. Waves may limit the activities of herbivores (Menge and Sutherland 1976) and prevent fouling organisms from colonizing. Thus, in very protected waters, as at Port Real Marina, kelp blades may be wide but their quality may be low due to severe grazing and

fouling. At the exposed Eagle Island site, few grazers or epiphytes were observed on the sampled kelp blades.

The canopy area of kelp beds declines in winter and reaches a maximum in late summer (Harrold and Reed 1985, Foster and Schiel 1985, Dayton 1985, Watanabe and Harrold 1991). Thus, kelp canopies increase in area during the spring months. The extent of kelp canopies increased by an average of about 82% from March to April. The canopy available for harvest in March is about 55% of that available in April. Since the Sitka Sound herring typically spawn in March, the kelp available for herring ROK is much less than that available for later herring fisheries.

The estimate of bed surface area, obtained in March, is surely a conservative estimate of bed area in April. Because the March estimate was used in the calculation of total biomass in April (using April estimates of average frond density and mass) the total biomass estimate must be regarded as conservative.

### Effects of Harvesting

The effects of harvesting kelp have been examined in numerous studies. Of the studies surveyed here, five were done in *M. pyrifera* beds in California (Miller and Geibel 1973, Kimura and Foster 1984, Barilotti et al. 1985, Barilotti and Zertach-Gonzalez 1990) and Chile (Santelices and Ojeda 1984), and two were done in British Columbia in *M. integrifolia* beds (Druehl and Breen 1986, Coon and Roland 1980, Coon 1982). Of these seven studies, all but one (Coon and Roland 1980, Coon 1982) suffer serious flaws in experimental design. None of the remaining six studies were replicated and each harvest treatment was represented by a single area or bed and compared to a single control area. All but one of these unreplicated studies were guilty of pseudoreplication (Hurlburt 1984) by applying inferential statistics to replicate samples within one experimental unit. The remaining study (Druehl and Breen 1986) did not use statistics in their study and differences were judged by intuition and experience. The results of these studies are frequently contradictory. For example, harvesting kelp has shown increases, decreases, or no change in kelp growth, holdfast growth, frond production, and plant survivorship. Hence, the results must be interpreted with extreme caution.

Of the studies that examined recruitment, all found that recruitment increased when kelp was harvested. The only significant effect observed in this study was a decrease in the average length of fronds in harvested areas. The lack of significant results in this study does not necessarily indicate that there was no effect of harvesting, but may be a result of low replication of treatments. Also, the experiment has only been monitored once, two months after harvest, so any long-term effects have not been determined. This experiment implemented the maximum harvest possible under current regulations, and the lack of detectable effects indicates that the more limited harvest done by the ROK industry may have little effect on kelp beds. These experiments need continued monitoring and expansion to estimate potential long-term effects of harvesting on kelp bed and associated communities.



## CONCLUSIONS

This study has provided some preliminary answers to the questions of 1) how much kelp is available and desirable for harvest, and 2) what are the effects of harvesting on kelp beds and associated communities? There appears to be enough kelp available in the surveyed area to support all Sitka Sound herring purse seine permit holders harvesting ROK with the following assumptions. There were more than 225,225 tons of kelp identified in this study. There are 51 permit holders in the Sitka Sound purse seine herring fishery. If each were permitted to conduct an ROK operation and if each harvested 5 tons of kelp (hypothetical amount based upon the test fishery), then the total kelp harvested would be 255 tons. Total *Macrocystis* harvests to support other ROK fisheries in Alaska (Craig, Hoonah Sound, Prince William Sound, and Nome) were 25 tons in 1998, and as high as 44 tons in 1992. If harvests for all of these fisheries, plus the Sitka fishery, were to occur in one season, the total harvest would still be less than 300 tons. This represents about 0.1% of the biomass of *Macrocystis* in the surveyed area. If the kelp harvests are not concentrated in any one bed or area, there is a low probability of depleting the kelp resource. In addition, the effects of the most severe harvesting allowed are apparently minimal. A more complete survey should be performed to survey all of the *Macrocystis* resources in Alaska. If a good photographic system is developed, a thorough survey should be practical. In addition, kelp density should be monitored yearly on a few representative kelp beds to ascertain yearly fluctuations in kelp density. Kelp beds often have dramatic yearly changes in abundance that are related to El Nino events (Dayton et al. 1984, 1992, Dayton and Tegner 1984, Tegner and Dayton 1987, 1991).

Increasing the demand for high quality kelp may result in conflicts among users for more desirable kelp. Of the 225,225 tons of kelp surveyed only about 14% of this kelp was deemed desirable to the ROK industry. A total harvest of 300 tons would represent about 1% of the estimated amount of desirable kelp available; however, the estimate for the amount of desirable kelp is very uncertain. The low estimate of desirable kelp is about 10,000 tons, and the maximum potential harvest is 300 tons, resulting in a potential harvest of 3% of the desirable kelp. If this harvest is concentrated in a small number of areas, as it has been in the past, users may find desirable kelp hard to locate and conflicts may occur among users. The estimate for the amount of desirable kelp needs to be improved. This can be accomplished by visiting more beds to sample more blades. It appears that the width of kelp blades does not vary at a site over the season, so a kelp bed can be evaluated at any time during the spring and early summer.

We observed few lasting effects of harvesting on kelp beds. This experiment was limited in scope and duration and should be monitored, continued, and expanded in spring of 2000. The effects of harvesting the same bed every year as well as harvesting only once need to be assessed. In addition, the effect of harvesting on the kelp bed community needs to be evaluated. Given the high growth and production rates of *Macrocystis* elsewhere (Lobban 1978a, 1978b, Coon 1982, Wheeler and Druehl 1986, Jackson 1987), it is anticipated that kelp recovery from harvesting should be completed by the end of summer for harvests in March or April.

Based upon the preliminary results of this study, there was sufficient kelp in March 1999 to support the currently proposed Sitka Sound ROK fishery assuming total harvests would be in the neighborhood of several hundred tons. Conflicts between users may occur over access to high quality kelp, but these conflicts may encourage harvesters to locate currently unused high quality beds. The effects of harvesting on kelp and associated communities appears minimal or negligible, but this needs to be verified by further research.

## Open Pounds and the Traditional Subsistence Fishery

The photo below was taken during the 1998 experimental fishery. Subsistence users set their hemlock branches near the open pounds. The pounds were anchored and tied in such a way as to not impede subsistence activities from taking place. There is concern that more pounds fishing will impede the subsistence fishery but there will still be plenty of area to suit the needs of both user groups.



There are plenty of fish available to both open pounds and subsistence users. Using the 27% conversion ratio from the ADFG report, 185 tons of herring can produce around 100,000 pounds of spawn on kelp (SOK). The current amount necessary for subsistence (ANS) for the Traditional fishery is between 136,000 and 227,000 pounds. Using the same conversion for SOK and comparing to the current ANS the total amount of herring needed to meet ANS would be between 250 and 420 tons. The amount of herring required for the upper end of ANS represents less than 1% of the forecast biomass in 2015. Also, the SOK fishery would not remove additional herring from the biomass increasing opportunity for subsistence needs to be met. Put simply, there is plenty of fish and area for everyone to coexist.

## Herring Spawn-on-Kelp

### An Update of Market Variables Affecting Demand in Japan



Jumbo No.1 Product



Seasoned Product

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October 24, 2001



## 1. Executive Summary

This report provides a concise review of market and economic factors influencing the current and future demand for BC Spawn on Kelp in the Japanese market.

The world's second largest economy is undergoing 'moderate' deflation for the first time in 40 years. This was before the calamitous events of and since September 11 this year.

Key feature that will affect demand for BC Spawn on Kelp (SOK) are:

- ❖ Higher priced food products are under pressure to deliver value, quality and supply consistency
- ❖ In the face of poor economic conditions, high debt and consumer purchasing shifts, several of the major sales channel members and sectors for food products in Japan are suffering declining sales and profitability.
- ❖ Seafood consumption in Japan appears to be holding its own against dramatic increases in beef and pork sales over the past decade (at least) as Japan strives to adopt more western eating habits.
- ❖ Japan's customary gift giving seasons remain intact, but 'givers' are seeking lower priced goods and are purchasing gifts for more occasions.
- ❖ BC's SOK production remains in a market leadership position, but faces pressures to deliver more consistent quality. The US and Russia are the two countries that could significantly increase production.
- ❖ Few reproducers of SOK in Japan dominate the 'front end' distribution
- ❖ The total supply of SOK to Japan is relatively small and must be inventoried to permit rear round supply, resulting in limited attention to market growth in consumption.
- ❖ Price of imported SOK appears to be both a function of classical supply and demand as well as the appetite of the importers (trading companies and reproducers) to attain annual market share goals
- ❖ Very little if any BC or Canadian 'branding' is carried forward to the end user in Japan.

Opportunities and recommendations include:

- ❖ Japan is the market of choice for any increased BC production in future
- ❖ The market can absorb more product and if increases are modest over time, may result in minimal price declines, if any, and increased consumption across all sales channels
- ❖ Production of thinner SOK could offer an opportunity to increase sales due to higher perceived value; new production techniques may be required

- ❖ BC producers and primary processors need to improve quality consistency in concert with buyer requirements – work with the market players, they are BC's only customer!
- ❖ ROK is a relatively healthy convenience food and can be promoted as such
- ❖ A super premium quality product, fresh light brine or no brine ROK could be tested for a high end application, delivered by air freight, in-season
- ❖ The Japanese market is complex and tradition bound – don't try to outsmart the market; work with market 'partners' for a win-win strategy to increase sales and consumption, should the need arise
- ❖ Carrying forward BC/Canadian identification and possible producer 'branding' to the end-user should be investigated as both a defensive and offensive strategy
- ❖ The BC SOK industry stakeholders should consider maintaining its market leadership through supply and market expansion to avoid being beaten to the punch by Alaskan and/or Russian competitors
- ❖ Resources should be found to investigate other markets for BC SOK, as a defensive strategy.

## 2. Project Scope

The focus of this report is to provide an overview of the most important economic and demographic drivers of demand and consumption for seafood, and Spawn-on-Kelp (SOK) specifically, from the perspective of this consultant.

The report presents a compendium of market information to incorporate into a broader assessment of the SOK industry being proposed by E. Blewett & Associates in their assignment for Fisheries & Oceans Canada.

An extremely tight time frame permitted for this project limited the number of market and SOK production contacts and their feedback; therefore the results are presented on a best efforts basis.

Opportunities and constraints of increasing consumption of SOK are described and Conclusions and Recommendations are presented.

## 3. Current and Market Situation

### ❖ Japan Economic overview

Japan's economy has been in difficulty for some time and has just entered its fourth recession in 10 years. Japan is the world's second largest economy yet



has the unenviable record of currently having the highest public debt (which includes massive bad debts at the nation's banks) in the western industrialized world.

In March, 2001, the Government of Japan admitted a state of 'moderate' deflation of its economy, for the first time in the last 40 years.

Prior to September 11, 2001, the world's powerhouses of the US, Europe and Japan were struggling to lift out of a global meltdown. Since that time, all indicators are pointing negative.

Experts say that Japan's woes are deeply rooted; business and industry needs an overhaul, but they caution that now is not likely the time to tackle painful reforms, given the severity of the economic slump in Japan, as well as with its major trading partners.

Some significant economic indicators in Japan, relevant to this report, are:

- o Consumer prices and consumer spending has fallen for three consecutive years
- o Japan's retail industry is undergoing restructuring pressures: Mycal, Japan's 4<sup>th</sup> largest retailer, filed for bankruptcy protection in September, one of the largest corporate failures in Japan's history.
- o Job cut fears are softening consumption, particularly on high priced goods, causing an upswing in personal savings
- o Hopes for Japan's economic recovery, both broad and related to its consumers appetite for high priced goods, is closely linked to the condition of the US economy.
- o The consumer trend to a more Western diet is ongoing, particularly among the nations' young and those with higher disposable income. Many of the more traditional Japanese products (including food products), are declining.

#### ❖ Sales channel trends

Due to the economic conditions outlined above, the retailing sector is exhibiting structural changes. Discount chains are strengthening their presence, while foreign retailers such as Costco and Carrefour are continuing their aggressive entry into the Japanese market and thus, are accelerating the severity of competition in the retailing sector.

Hardest hit have been the general merchandise sector, which includes supermarkets, which saw a 5.3% decline in total sales versus the previous year. Convenience stores are still flourishing but sales and operating profit appear to have peaked or are weakening.

In the foodservice sector, take-out lunchboxes and delis are becoming a driving force due to the changes in people's lifestyle and consistent with the savings minded Japanese consumer attitudes.

It is indicated in several industry reports (e.g. DFAIT Japan Fisheries Market Report, May 2001), weak economic conditions are seeing declining consumption at higher priced restaurants and sushi bars.

On a brighter note, there is an increasing trend to eating out dining at chains and independent restaurants specializing in 'revolving belt' sushi outlets (Nihon Shinbun Kyokai [NSK], October 21, 2001).

Japan's heritage of gift giving continues. It is customary to give gifts to business associates, colleagues, friends and family members. Some notable characteristics of gift giving in Japan are:

- ❖ Historically, the two key gift giving periods are summer season called "Ochugen" and a winter season called "Oseibo".
- ❖ Poor economic conditions have seen a decrease in terms of both the number of gifts given and their value, particularly during the winter season. Despite this trend, gift giving is still a large 'industry' (\$US 90 billion in 1999), with food products composing approximately 20% of this total.
- ❖ There is a trend to give more gifts more often (at other times of the year) and on more occasions.
- ❖ Typically, gifts are of higher quality and traditionally high image brand names have been important.
- ❖ Seasonal gifts are sold primarily through speciality wholesalers to upscale Department Stores, upscale Retail stores and speciality gift stores. Increasingly, the convenience store sector has started carrying a limited selection of gift items.

#### ❖ Seafood consumption trends

Seafood consumption in Japan remains among the highest in the world and continues to rely heavily on imported products (\$US 16 billion), with Canada's share in 12<sup>th</sup> place (547 million, 3.4% of seafood imports).

Seafood imports by Japan will likely continue to increase in volume in future years due to declining domestic fishery and aquaculture supplies as well as high seas catches. The changing appetites of Japanese consumers for convenience foods and healthy eating can continue to be fulfilled by seafood products as producers, reprocessors and the retail/HRI sectors satisfy these demands through new product development and branding programs.

#### ❖ Beef, pork and poultry trends

Consumption of beef, pork and poultry have increased dramatically in Japan during the past 10 years consistent with the changes in demographic makeup and an appetite for western foods. Time trends in food intake, indicate an increase in meat consumption of 13% compared to 3% in seafood consumption (1990-1997, Japan National Survey by Ministry of Health and Welfare)

The recent mad cow disease scare in Europe has spread to Japan. Short term impact is seeing a dramatic fall off in beef consumption. To date, no increase in seafood consumption has been noted (Bill Atkinson News Reports, Oct. 22, 2001)

#### ❖ Roe-on-Kelp production & consumption trends

##### Production and Price trends:

- According to DFAIT/Ni-Ka Online, imports of herring Spawn-on-Kelp decreased substantially (by 32.6%) in terms of volume from 869 mt in 1999 to 586 mt in 2000. A sharp decline in imports from the United States from 329 mt in 1999 to 34 mt in 2000 was the major reason for this decrease in the total import. Reflecting the decrease in the quantity, the average import price for both Canadian and US products has recovered slightly from 1,876 yen per kg (C.I.F.) in 1999 to 2,118 yen per kg in 2000 for imports from Canada and from 1,357 yen per kg in 1999 to 2,160 yen per kg in 2000 for imports of the US.
- **Note:** there are some interpretation questions in these statistics that remain unresolved. For example, the US fishery statistics indicate production from both Alaska and San Francisco was 236 mt in 1999 and 87 mt. in 2000 (0 from Alaska). Comparing these figures to those above indicates possible carryovers in production within the US, or inaccurate import statistics. Similar analysis has not been tested in other years or for other countries production versus import statistics.
- Embassies and Fisheries Departments were contacted in countries that have prior SOK production (Finland, Iceland, Sweden, Norway, Atlantic Canada, S. Korea and Russia). Responses are as follows:
  - Atlantic Canada: Newfoundland had reserved a quota of 200 mt for 1999/2000, but reports no landings in recent years. More information may be forthcoming.
  - Russia: embassy staff report no knowledge of a fishery for this product, more information may be forthcoming, but statistics are poor, particularly for exports.



- S. Korea reports no knowledge of production
- Finland, Iceland, Sweden and Norway have yet to respond
- Note: time may provide insights to the lack of information, but it appears that export statistics of this product are not readily available, or perhaps non-existent due to small production quantities in these countries.
- A significant buyer of BC, Alaska and San Francisco SOK that I spoke to indicated no recent production from Iceland, Sweden, Norway or S. Korea. He did indicate, however, that:
  - Finland produced 26 mt in 1999, 12 mt in 2000 and none reported to date in 2001.
  - Russia produced 42 mt in 2000 and none reported to date in 2001.
  - Russia has been encouraged to develop a fishery and has produced limited and intermittent quantities in recent years. Poor weather, ice, inadequate resources and training have impeded development of a fishery there, to date.
  - The San Francisco fishery is of limited herring biomass, so there is little likelihood of increase SOK production in future.
  - The area with the largest potential to increase production, outside of BC, is Alaska. Much of the herring roe fishery in Alaska is frozen in the round and exported to Japan and China for processing into brined roe for Japan. The prices received by herring roe harvesters in Alaska is significantly below what could be obtained if they transferred their quota to SOK. Alaskan fishery regulators would support this, but some of the existing herring permit holders are reluctant to support a conversion initiative, to date.

#### Consumption trends

- Due to poor economic conditions in Japan, the traditional sales channels for this product have been shifting from high-end Japanese restaurants, sushi bars and gift items to less expensive venues. In addition:
  - Poorer quality product is being processed into less expensive retail packs for department store and grocery store consumption (including seasoned products) in greater quantity than the past.

- "Japanese trade people engaged in importing, distribution or processing hold that the development of the market in this direction will be the only way to increase (sales) prospects for this product in the Japanese market". (DFAIT Japan Fisheries Market Report, May 2001)

#### ❖ Currency factors

BC Herring SOK is purchased in Canadian dollars. The value of the Japanese yen to the Canadian dollar during the time of purchase of SOK could influence the price paid in BC and the resulting selling prices in Japan (in Yen/kilo).

This consultant was not provided with BC selling prices to determine if this factor is 'in play' in price determination. However, analysis of the movement in the value of the dollar vs. the yen was tracked back to 1995 and average import prices of a number of seafood products in yen per kilo were examined:

- It appears that there is little, if any, relationship between the strength or weakness in the yen and the selling prices of a number of seafood products in the Japanese market (salted herring roe, Ikura, King Crab, Northern Shrimp).
- The highest prices in yen/kilo in Japan for SOK was in 1995; this was also the year in which the yen was strongest against the dollar, compared to subsequent years. This price effect may have resulted in higher prices paid to harvesters in BC.
- In Japan, other factors are believed to be of greater influence in determination of the end-user price:
  - supply and demand
  - market share goals of importers and reproducers
  - quality of the annual 'pack' on average
  - 'in-market' factors such as inventory levels, disposable income, reduced demand for higher priced food products and reduced expenditures on eating out at high end restaurants

#### ❖ Roe-on-kelp purchasing dynamics

BC SOK permit holders are restricted to an 8 ton quota. Permit holders are also required to weigh their product after brining and are given a 6% overage allowance for brine uptake.

It was reported to this consultant that a 'scandalous' practice that has gained in popularity is to obtain an official weight prior to brining, then brine the product and boost the weight. This allows the 'real' quota to be exceeded. However, to maintain maximum roe quality, the product must be brined as soon after harvest as possible. The delay in brining caused by the aforementioned practice decreases quality. It was reported that this practice is generally carried out with

the knowledge of all parties. Japanese buyers have difficulty in detecting quality deterioration due to 'sampling error' at time of inspection of sample lots.

#### ❖ Dominance of few re-processors

Few Japanese reproprocessors exist for SOK. Current information indicates that Taniya continues in a dominant position (estimated at 70%) in reprocessing and supplying to all sales channels in the Japanese market.

Despite this dominance, other reproprocessors vie for market position and influence the price paid to trading companies/importers in any given year. It was reported that the major historic buyer of SOK, Taniya continues to be the major force today.

#### ❖ Channel player health

The distribution system in Japan from raw material purchase (BC SOK) to trading company to re-processor to wholesalers and major channel players has not been simplified for this product – the health of each segment makes a difference to the operation and health of the whole.

The Japanese food retail and food services sector is both in transition and under serious price and profitability stress due to the weak Japanese economy, high debt and shifting consumer purchasing behaviour. Current reports of business failures and poor financial performance are common

Change will be the 'constant' over the near future, at least. If the sales channel members responsible for sales of SOK were to experience serious financial difficulties or were to shift their product focus, further price erosion could take place.

#### ❖ Supply size

The supply of SOK is relatively small compared to other seafood imports and food products in Japan. This low volume characteristic results in a reluctance by channel players below and including the reproprocessors to spend much time and/or marketing funds on channel expansion, regional distribution expansion or internal promotion. This relationship if further aggravated, under current economic conditions, by the positioning of SOK (BC's in particular) as a high priced/luxury product.

#### ❖ SOK Branding

There is very little if any producer/exporter brands or country of origin labelling of SOK being carried forward to the end-user in Japan. (Note: on the cover of this



report is a photo of seasoned ROK, (Cheena brand), which shows a display window in the shape of a Canadian flag. It is not known if this product is marketed in Japan – Cheena has gift shops in Vancouver, catering to Japanese tourists).

Brands are extensively used by reprocessors, importers, food distributors and retailers in Japan that form the basis of building awareness, preference and consumer promotion activities.

## 4. Opportunities and Recommendations

### 4.1. Market Expansion: Japan or beyond?

Any market expansion strategy, in this case to expand consumption/sales, would either focus on methods to expand existing market(s) or expand current or future distribution into new markets

A marketers' primary analysis of these options would focus on cost and benefit of the alternative strategies. Typically, the cost of developing a new market(s) would be far higher, complex and time consuming (years) than an existing market.

Primary reasons to look to new markets for SOK would be due to:

- o Major impediments to market expansion in current market including economic factors (e.g. negative price elasticity which would see dramatic declines in price if supply were increased)
- o Market research that indicate probable or defined interest to purchase by buyers and/or consumers in new markets (we haven't done this research beyond a few phone calls!)

It is my recommendation to focus on the Japan market, at least in the short term, to increase the market position of BC SOK or if required, to increase consumption.

Good or bad, there is a single market 'heritage' of consumption in this market aside from limited consumption of this product in other countries by Japanese expatriates and some eating establishments and gift shops catering to tourists and 'adventurous' diners.

- o Quick investigation I did of consumption in nearby Asian countries turned up nothing (e.g. sushi bars in Korea that cater to Japanese tourists/business people do not currently offer roe-on-kelp – this despite that Korea eats many different fish roe products). Further investigation might prove this market to be of some potential, who knows!



#### 4.2. Supply and price relationship appears to be 'economically' elastic, with limits

Information from interviews suggest that an increase in supply of uniform 'high' quality SOK from BC, if in small increments, should not see a significant decrease in prices received.

Should this be achievable, the market can be grown without negative impact on prices received by BC producers.

#### 4.3. Supply is very small in total in a large market

Despite the current price sensitivity to higher price goods in Japan, the quantity of SOK in the Japan seafood scene barely hits the radar screen.

Some observers believe that there is plenty of room for Japan market expansion of SOK across all sales channels, including the higher priced gift and upper end restaurant/sushi bar sectors.

Further, in order to present marketing and promotion opportunities for sales channel members in Japan, increased supply would be required, particularly as year round supply is essential to retaining consumer loyalty and purchase.

#### 4.4. Retail marketing of SOK has been limited by limited supply and price

Marketing of SOK at the retail supermarkets has been limited, mainly due to price and the margin requirements of retailers. This channel has/is being used for lower priced product and seasoned product but has hardly been touched due to high historic prices and limited supply. This channel requires consistent and substantial supply to obtain shelf space and maintain 'listing's' or 'rental space' within the store.

If an economical production method could be developed to produce SOK with thinner roe coverage, it would be possible to offer less expensive product to this major consumer sales channel.

#### 4.5. Japan's image of Canadian food products is positive

Japanese consumers have a high regard for 'western' and Canadian products, though price and quality have become increasingly important.

In order to differentiate BC SOK, a branding opportunity is presented to identify Canadian production.

#### 4.6. BC SOK is variable in quality

Despite quality grades set by BC processors and purchased by Japanese buyers after inspection, it was reported that quality is inconsistent within the set grade standards.

More stringent quality guidelines at time of inspection and purchase in BC could be implemented to improve quality consistency and reduce reprocessor costs of misgrades and grading in general in Japan.

#### 4.7. Health and time-conscious consumers are increasing

Japan is tracking other western industrialized consumers in paying increasing attention to healthy foods that are easy and quick to prepare (e.g. low(er) fat and salt, microwaveable, etc.)

SOK fits the bill. It is effectively ready to eat. Brined herring roe by comparison is more time consuming to prepare and has to be soaked, washed and is typically re-seasoned prior to eating.

These features could be positively promoted.

#### 4.8. Fresh-by-air SOK – possible?

High-end restaurants in Japan pay very high prices for the freshest products. Though I'm not aware if it has been attempted, it would be feasible to transport fresh product with little or no brine added to Japan via air cargo without suffering significant quality loss.

This would only be possible during the production season and likely for a limited quantity, but this may offer an additional 'top-end' channel to operate in (e.g. False Pass/Copper River Sockeye – the first of the season).

#### 4.9. Don't try to outsmart this market

One might be tempted to look at expanding consumption and/or to increase price of SOK by leapfrogging the distribution system, jump in with BC producer branded product and market product directly to the highest priced sales channel.

Don't! Money down the drain.

It is my conviction that the best means to create a winning marketing strategy in a foreign land with a product like SOK, is to work with trusted 'partners' in Japan to co-devise the most sensible and cost effective marketing strategy. The plan



must be win-win for all parties if it is to succeed and may indeed require some adjusting on the production and fishery management side in BC as well.

#### 4.10. Beat 'em to the punch – keep BC's market leadership

BC is the market leader of SOK in Japan.

BC has seen eroding market share of its once leading 'wild' seafood products. SOK is an interesting product as a wild resource is utilized to produce finished product attributes that can be controlled and manipulated similar to true aquaculture practices.

It was described to me that both Alaska and Russia have the potential to increase production of SOK, given adequate resources and dedication. This may be a 'soft' challenge. If BC doesn't rise to the challenge, someone else may facilitate the growth of our competitors.



## ROK Marketing Questions and Answers

There have been market studies for roe on kelp (ROK) but the studies were completed over a decade ago. The market conditions surrounding herring roe products, both sac roe and ROK, have not changed much since these reports were written. In order to provide updated information a longtime broker of herring roe products was contacted. The following are questions and answers from the discussion:

How much of a market would be available for this “new” ROK product?

In 2004, there was an abundant supply of ROK coming out of BC/SE AK. I think in 2005 it was around 800 ton total supply. That volume was a real challenge for both seller and buyer. The sales prices were quite low and allowed for entry into new consumption markets. ROK became something that was accessible at pubs and such places versus something that was so expensive as to be served only at weddings and high end sushi bars.

New consumption channels arose and the 800 tons of supply did not appear so daunting as indeed the carryover inventory the following year was not as severe due to increased consumption.

The advantage ROK has over Herring Roe is that the image of ROK is not as heavily wedded to New Year’s season consumption. As well, the combination of kelp with herring roe seems to be more appealing to some consumers than herring roe by itself. I seem to notice more sushi menus offering ROK in a visible manner versus herring roe.

Also, the supply of ROK is much smaller than Herring Roe. The Herring Roe market is sometimes said to be around 10,000mt. The supply of ROK tends to be in the 300mt to 500mt range. Total supply is much less than Herring Roe and increasing the supply of ROK, in terms of overall supply, is a much smaller number and should be easier to deal with - especially if we are talking about ROK being a staple of the sushi market which is a very robust and successful market in Japan.

The sushi market utilizes the thinner coverage production. The sushi restaurant market in Japan is thriving. (4,010 sushi restaurants in 2014)

The one thing I would caution is, the market for raw materials to use as sushi toppings is relatively deep - but it is price sensitive.

To come back to your question, I think there is market space for additional ROK product but it will be price sensitive in the short term. I would think that as the popularity and demand for ROK increases, gradual price increases are possible as long as supply does not have the wild swings that we have seen in the past.

The large harvest of 2005 then reduced harvests in 2006 and 2007 whereby in those two successive years the price doubled each year but the market shrank to match the available supply.

Would the additional product produced in Sitka be a detriment or complement to the products currently produced in SE roe herring fisheries?



Anything that decreases the availability of sac roe going to the Japanese market would be positive for the market. Allocating available resources from sac roe to ROK should be a net benefit. We are currently going through a period of suffocating oversupply on the sac roe side. This year's ROK supply was also quite abundant, being at least double of the year previous and this has had a deleterious impact on pricing but as mentioned previously the overall volume of ROK is much different than herring roe and poses different and I would say less daunting challenges. Let's remember that the supply of ROK really only comes from BC and SE AK whereas herring roe comes from more sources and in greater volumes. (Let's not forget herring roe also comes from Atlantic Ocean sources)

Thus, even though we had a sudden surge in ROK production this season that was over double of last season's harvest the volume is still manageable with the market taking a longer term view on consumption such as 18 months versus 12 months. Once again, the scale of volume we are talking about is much different for ROK versus Herring Roe. (2014 estimated harvest: Herring Roe – 8,400mt / ROK – 600mt)

What is the long term outlook for sac roe and ROK products?

The long term outlook for herring roe is stable consumption with we would hope growth due to the available supply of herring roe. Recent history would suggest that we will not see explosive growth in herring roe consumption. Closed Pound ROK or Open Pound ROK will likely be viewed the same in the market and would be compared by current quality attributes which assign value.

Is it safe to assume that if the sac roe price increases then the egg on kelp market would also see a corresponding increase?

Although they are different products per se, there is a linkage between the pricing of herring roe and ROK since they are similar products. This year would have been a good test case to see what kind of price differential would be possible had the harvest of ROK been limited. But, it is generally thought that the pricing of the two products cannot be vastly different.

Will adding ROK in Sitka will not be a detriment to already existing ROK fisheries in SEAK.

The history of ROK pricing may make this difficult. Because the ROK market is small in terms of volume and buyers, the price is quite sensitive to volume when the volumes are limited. The past 10 years have seen some volume swings and foreign exchange movements that have led to a wide range of pricing for SE AK ROK. The current context of high volume and the comparative weakness in the yen will make it hard to take the position that additional ROK from Sitka will not soften the market further. (although it looks like there are resource issues in Hoonah, Ernest Sound and Tenakee which may make SE AK ROK a scarce commodity even with a Sitka ROK fishery)

The market will not be taken away. There is room for market expansion, although the near term impact may be lower pricing until the market adjusts to the increased volume.





JAN-15-2008 16:50

ELDERWOOD TRADING CO LTD

604 4614542 P.02

## **ELDERWOOD TRADING CO., LTD.**

276 Newport Drive, Port Moody, B.C., Canada V3H 5C9

Tel: (604) 461-4555, Fax: (604) 461-4542

TO WHOM IT MAY CONCERN

Subject: Sitka Sound Roe Herring Open Pound Fishery

I have been invited to provide testimony on the subject of SOK production in Sitka Sound. I would consider it a privilege. It is my sincere hope that the views expressed here may promote healthy discussion and perhaps, lead to the adaptation of policies which will benefit all in the industry.

I have been involved with SOK for the past 20 years. During those 20 years, my company has gained valuable knowledge and experience into the workings of the SOK market. In 1999, we purchased 260 tons of SOK from California, B.C., and southeast Alaska, including Sitka.

It is my understanding that if the full potential of roe herring is utilized, Sitka may one day become the leading SOK-producing region of the world. I have heard concerns expressed that such increase in supply would disturb the delicate balance of supply-and-demand and produce a negative impact on the already fragile market, and bring hardship to the existing permit holders of SOK. These are legitimate concerns and one must not take them lightly.

However, I am of the opinion that, reducing the supply to keep the price up can work only under certain market conditions - but not now. In the present market climate, it will only mean repeating the same mistake that already has led the SOK industry to its current predicament.

To explain further, first let us examine the reasons for the current downturn in the SOK market. In my opinion, the present difficulty is in large part due to reaction to excessively high prices of the past.



JAN-15-2000 16:50

ELDERWOOD TRADING CO LTD

604 4614542 P.03

To elaborate on this point, I have attached two graphs following.

The dollar values used are the mean average prices for closed pound SOK from B.C. They show a dramatic price increase that peaked in 1995, only to be followed by an equally precipitous price drop, which continued unabated to 1999. The expression, "Where the mountain is high, the valley is deep", encapsulates the essential behavior of the SOK market.

Graph 1 shows the combined supply of SOK from all the North American production areas. Here the rising prices up to 1995 seem to correspond with decreasing supply. In the same token the declining price curve from 1996 coincides with increasing supply for that period. Here, a superficial examiner of this graph may jump to a hasty conclusion that this is the evidence of increased supply driving down the prices. However, he must be cautioned not to be so hasty.

Graph 2 shows same price curves. However, it is different from Graph 1 in that it shows only the closed pound production from B.C. and southeast Alaska. Here the supply of thick product was fairly consistent through the same period of great price upheaval. Granted, there was a sizable supply increase in 1997. However, during the years that followed the declining price curve continued despite supply reached a plateau. It is reasonable to conclude, then, that it was not the over-supply that affected the price of SOK, but some other factors were at work.

The single most important factor that has been driving the price down, in my opinion, is the economic recession in Japan. During the bubble economy years that lasted until early 1990's, Japanese consumers displayed great appetite for luxury. Consumption of expensive foods, including SOK, rose to record levels, and as those commodities became objects of speculation, the prices soared. But as the bubble burst, realities of economic recession set in, and the consumers backed off.

Take for example the kazunoko (herring roe) market. Despite the fact that the 1999 supply of kazunoko was the lowest in twenty years at less than 10,000 tons, the year-end gift kazunoko market plummeted. Conversely, lower-priced kazunoko in the form of consumer pack fared relatively well. Total consumption appeared to have been at par with supply.





JAN-15-2000 16:51

ELDERWOOD TRADING CO LTD

604 4614542 P.04

The same situation manifested itself with SOK. Movement of thick SOK (Jumbo & No.1 from B.C. and Alaska) was extremely sluggish, and the prices were down to record low levels. Thinner product, on the other hand, sold well, because prices were low enough to appeal to consumers.

These examples show that the market is constantly evolving, and that how important it is to stay in tune with the consumers' needs.

There are four main ingredients to successful marketing. They are:

- Healthy demand
- Consistent supply
- Reasonable price
- High quality

Of these, a healthy demand has to be ranked as the highest importance. If the high prices of recent years have alienated the consumers away, what the SOK industry must accomplish now is to find way to recapture the lost customers and generate new demand. Aside from making the product more appealing in terms of both price and presentation, the key is to make SOK accessible to a greater number of consumers. The task of generating demand is not a difficult as it may seem. For SOK possesses inherently superior product appeal. For instance, nine of ten people who actually tasted SOK will show a decided preference for SOK over kazunoko. This is an evidence enough that there is a huge potential for an untapped consumer market for SOK.

However, the size of the market can only be as big or small as the volume of supply. In this sense, the very limited supply that gave SOK the exclusivity in niche market is a fundamental weakness that prevent it from acquiring wide popularity. This point is clearer when one compares the supply of SOK against herring roe. In 1999, the total supply of herring roe was 10,000 tons, while SOK was just over 500 tons, barely 1/20<sup>th</sup> of kazunoko. This means that only a very few consumers had ever tasted SOK. Indeed, the majority of Japanese are even aware of its existence. The solution, then, seems to be to increase supply, while maintaining reasonable price and quality.



JAN-15-2000 16:51

ELDERWOOD TRADING CO LTD

604 4614342 F.05

To this end, proposed alternative harvesting in the form of SOK in Sitka can make a significant contribution, especially if the open pound method is used. In the market where thick product by closed pounds dominates, thinner product by open pound will provide just enough diversity. It is possible that, instead of competing, producers of open pound and closed pound SOK can complement each other. By having the ability to offer rich variety of product, the SOK industry collectively will enjoy a greater chance of success in the task of opening wider market, and cultivating the greater demand in the process.

In conclusion, I believe that, if managed properly, open pound SOK fishery in Sitka Sound offers a promising alternative for better utilization of available resources. Even though critics may have legitimate reasons to worry about the over supply, benefits far outweigh the detriments. Perhaps, in consideration to existing permit holders the initial quotas should be set at a moderate level, but with mechanism to increase gradually as more demand is generated.

Thank you for the opportunity to voice my opinion. It is my sincere hope that the new management plan for SOK in Sitka Sound will be formulated with the greatest care for the future benefit of all.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Ed Furumori", written in a cursive style.

Ed Furumori



**From:** Ryan Littleton  
**To:**  
**Subject:** Re: Email for Board comment  
**Date:** Tuesday, August 22, 2017 11:06:46 AM

---

I would like to pull my proposal (number 54). There is another proposal that I will support at the meeting.

Thanks,  
Ryan Littleton  
PO Box 2143  
Petersburg AK  
99833  
907-518-1990

---



Submitted By  
Ryan nichols  
Submitted On  
12/28/2017 5:23:57 PM  
Affiliation

Proposal 116: I would like to write in support of the proposed annual bag limit on non resident anglers concerning sable fish in outside/federal waters. I concurred w the proposed that there should be an annual bag limit for non residents and feel that the daily bag limit and possession limit should be that of 3 daily 3 in possession w an annual limit of 6. Sablefish stocks are fully utilized and with the nonresident limit having no annual limit allows for unlimited growth in a fishery that is fully utilized. As for a reduction in bag limits and annual limits, I feel that a daily limit of 3 is large enough to warrant people targeting black cod but will also help ease increasing pressure on this species especially in localized areas. Lowering the bag limit on sablefish would also help reduce catch of non-target species such as rougheye and shortraker rockfish.



Submitted By  
Sandra Nessett  
Submitted On  
12/15/2017 12:29:22 PM  
Affiliation  
Mrs.

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9075307145  
Email  
[sandranessett@hotmail.com](mailto:sandranessett@hotmail.com)  
Address  
P.O. Box 61  
Craig, Alaska 99921

To Board of Fisheries concerning SE and Yakutat Shellfish. Concerning Proposal 84.

5 AAC 31.136. Closed waters in Registration Area A.

Close additional waters in District 2 to commercial pot shrimp fishing as follows: (4) Shrimp may not be taken in the waters of Kasaan Bay North and West of a line from the Northern most tip of Daisy Island located at 55°28.816'N lat. 132°19.379' W long. Northeast to a point on Kasaan Peninsula located at 55°30.533'N lat, 132°18.191'W. Including all waters of Twelve Mile Arm.

REASON: Over the years District 2 commercial shrimp season has caused a downward trend to the shrimp biomass in the waters of Kasaan Bay and Twelve Mile Arm to a point where the area can no longer support a commercial fishery. Beginning with 2009 quota from 86,000 lbs to 65,000 lbs. ADF&G stated the reasoning for the reduction was due to EXCESSIVE EXPLOITATION RATES, DECLINING CPUE and a decrease in mean carapace length. In 2010 quota was 65,000 with 68,893 harvested. In 2011 quota 65,000 with 75,425 harvested. Incredibly in 2012 quota stays at 65,000 with 74,631 harvested! Excessively over the quotas here folks. In 2013 still 65,000 (wondering where your interest lies here guys) with 62,250 harvested. In 2014 quota finally reduced to 52,000 and CLOSED by Emergency Order the waters of Kasaan Bay, Twelve Mile Arm and Skowl Arm after only 12 days. Commercial shrimp fisherman harvested 50,0826 lbs of shrimp. Subdistrict 102-60 Kasaan Bay and Skowl Arm is being closed as a conservation measure to protect this localized shrimp stock from additional fishing pressure. Commercial harvest rates have been in decline over the past several years. The Pre-season survey the department has conducted over the past four seasons has also shown a precipitous decline in the catch rates of spot shrimp as well a decline in biological parameters. ADF&G has not opened the waters of Kasaan Bay and Twelve Mile Arm since 2014. This commercial closer is a small percentage of District 2. We have moderate personal use fishing pressure through out the year from residents of Prince of Wales Island as well as Ketchikan. However, personal use fisherman has declined rapidly due to their catch effort is very low. Prince of Wales has a large population of subsistence/personal use who rely on the land and ocean to survive. The island has a high cost of living with financially depressed economy. A regulation closure of the area to commercial shrimping would protect a relatively small percentage of District 2 to allow personal use fisherman to utilize the shrimp resource. The areaselected for closure is in close proximity to the community of Hollis and Kasaan. Both places have harbors and boat launches wich are utilized by all residents of Prince of Wales Island with small vessels. Commercial vessels would still be able to fish District 2 in waters, Not directly adjacent to the communities of Hollis and Kasaan.

I am requesting that the Board of Fisheries enact this regulation change as written, to protect the personal use shrimp fishery for the residents of Alaskans. I feel it is the DUTY of the Board of Fisheries to PROTECT the shrimp biomass of Kasaan and Twelve Mile Arm for the residents of Alaska! Not just the betterment of the commercial enterprises.

Sincerely an Alaskan resident, living a subsistence lifestyle in Hollis Alaska. Thank you.



Submitted By  
Sawyer Smith  
Submitted On  
12/28/2017 5:52:39 PM  
Affiliation

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4235059264

Email  
[Sawyer.wells.smith@gmail.com](mailto:Sawyer.wells.smith@gmail.com)

Address  
1408 Halibut Point Road  
Sitka, Alaska 99835

I just want to voice my strong support for proposal 99 and the other proposals put forward by the Sitka tribe of Alaska. Herring are critical to the culture of the Tlingit people and vital to ensuring a balanced aquatic ecosystem. Recent trends make it abundantly clear that drastic changes must be made.





**Submitted by Seth Charlton**  
**December 26, 2017**  
**Support for Proposal 184**

Members of the Board of Fisheries,

I am a hand troll permit holder in the Southeast salmon troll fishery and I strongly support Proposal #184. This proposal would allow hand trollers to use downriggers on a year round basis. Different versions of this proposal have been presented to the BOF in previous cycles and have not been successful. You once again have the opportunity to pass this common-sense proposal.

Downriggers simply serve to set the line of a rod and reel at a known depth. Passage of this proposal would allow hand trollers to control the depth of presentation when fishing their single lure or baited hook. Depth control is a fundamental requirement of salmon fishing and should be available to those using rod and reel, just as it is for hand and power trollers operating gurdies. Current regulations allow the use of downriggers during the winter king salmon fishery only. Adoption of this proposal would provide hand trollers with an option to help avoid shoulder injuries and a safer fishing option for small skiff operators in rough sea conditions where the operation of heavy duty gurdy gear becomes more dangerous.

The enforcement community has opposed this proposal citing concerns about separation of gear and the reduction in ability to visually distinguish sport vessels from commercial vessels should the use of downriggers be permitted outside of the winter season.

Here are the facts that the Board should consider:

- There currently is no separation of gear; sport fishing for salmon is allowed from commercially registered power and hand troll vessels.
- An enforcement officer cannot determine what a fisherman/vessel is up to unless they contact that vessel.
- A hand troll vessel is required to display the letters "HT" on both sides of the vessel when registered to participate in a commercial salmon fishery.
- A fisherman taking a salmon in the sport fishery from a commercially registered troll vessel must immediately remove the dorsal fin of that salmon to distinguish that fish from a commercially saleable salmon.
- A person may not sportfish and commercial fish for salmon from the same vessel on the same day.
- An enforcement officer has the tools needed to identify registered commercial hand troll vessels on the fishing grounds ("HT" lettering requirement) and to prosecute individuals fishing and intending to sell illegally taken sport caught salmon from waters closed to commercial salmon fishing (dorsal fin removal requirement).



Finally, those that would choose the downrigger/ rod and reel combination over hand gurdies would also be voluntarily accepting a reduction to the amount of gear they could fish. There is no conclusive evidence to support the notion that passage of this proposal will result in an increase in harvest by hand trollers. Alternatively, the catch could potentially decrease for a hand troller that chooses to use rod and reel instead of hand troll gurdies which allow the use of many hooks.

Thank you.



Submitted By  
Shaun Haseltine  
Submitted On  
12/27/2017 1:10:00 PM  
Affiliation

Phone  
907-617-7540

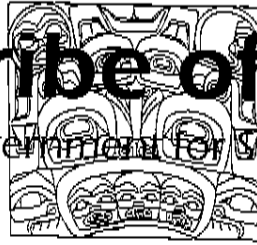
Email  
[shaunhaseltine@hotmail.com](mailto:shaunhaseltine@hotmail.com)

Address  
P.O. Box 484  
Klawock, Alaska 99925

I Oppose #80 and #81

# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



PC147  
1 of 13

December 28, 2017

VIA FAX (907-465-6094)

Board of Fisheries  
ADF&G Boards Support  
PO Box 115526  
Juneau, AK 99811-5526

**RE: STA Comments: Support for Proposals 99, 105, and 106 and Opposition to Proposals 94 and 104**

Dear Board of Fisheries Member,

I write on behalf of the Sitka Tribe of Alaska (STA), a federally recognized tribal government in Sitka, Alaska for over 4,000 tribal citizens. STA is responsible for the health, welfare, safety, and preserving the culture of its citizens.

Herring are a culturally and ecologically important fish in Southeast Alaska. They have been an integral part of Native culture in Southeast Alaska for thousands of years (Moss et al, 2016; Thornton et al, 2010). Herring eggs are a celebrated traditional food; they are often shared as gifts and eaten at gatherings such as potlatches (Schroeder and Kookesh, 1990). Sitka Sound is the last herring stock that consistently provides a substantial subsistence herring egg harvest; however, the needs of subsistence harvesters have not been met in recent years. Alaska Department of Fish & Game (ADF&G) data show that subsistence needs for Sitka have only been met in three of the last ten years (Sill and Cunningham, *in press*).

Herring are an ecologically important species for the marine ecosystem. Traditional Ecological Knowledge (TEK) suggests that herring stocks are severely depleted and are being managed under a shifted baseline (Thornton et al, 2010; Pauly, 1995). STA believes herring are a critical link in the marine food web and further decline of herring stocks will negatively impact other culturally, ecologically, and economically important fish species, such as king salmon and halibut. STA is concerned with the health of Sitka Sound herring and believes conservation measures are urgently needed to prevent further decline and the potential extirpation of Sitka Sound herring. **STA's position on Board of Fisheries proposals is rooted in preserving Native culture and marine ecosystems.**

**Sitka Tribe of Alaska supports Board of Fisheries (BoF) proposals 99, 105, and 106. Sitka Tribe of Alaska opposes Board of Fisheries (BoF) proposals 94 and 104.**



### Amount Necessary for Subsistence

The Alaska State Constitution directs the Board of Fisheries to provide for subsistence uses of a fish population before any other allocation (Alaska Statute AS 16.05.258 [b]). Herring populations were previously abundant across the North Pacific and provided a plentiful subsistence harvest in coastal communities throughout the Pacific Northwest (McKechnie et al, 2014; Moss et al, 2016). Southeast Alaska herring stocks have declined significantly since the start of reduction fisheries in the late 1800s and Sitka Sound is now the only herring stock that still consistently provides for a significant subsistence harvest (Thornton et al, 2010). Sitka herring eggs are shared across the state and the country (Sill and Lemons, 2012). In the 2017 Tribal Needs Assessment, 145 STA Tribal household responded that they eat herring eggs; this was the second-most widely consumed traditional food, trailing salmon by only four households (McDowell Group, 2017). It is imperative to conserve Sitka Sound herring and ensure that subsistence harvest needs are met. Alaska cannot risk losing an irreplaceable part of its Native culture.

The Board of Fisheries set the amount reasonably necessary for subsistence (ANS) at 105,000 – 158,000 pounds of herring roe from 2002 to 2008 and adjusted the ANS to 136,000-237,000 pounds beginning in 2009, based on harvest estimates from ADF&G surveys for 2002-2008 (Sill and Cunningham, *in press*). The ANS has been met in seven of the past 15 years with data available (2002-2016). However, the ANS has only been met in three of the last ten years and only one of the last six years, in 2014 (Table 1). Proposal 94 suggests reducing the ANS to 60,000 – 120,000 pounds without providing any justification for the reduced ANS harvest levels. The ANS is currently based on the best available data, compiled by ADF&G. If Proposal 94 is adopted, it would mean that the ANS would have been met in every single year subsistence harvest data have been collected. Subsistence harvesters have clearly indicated that subsistence needs have not been met in each of the last 15 years, as evidenced by ADF&G subsistence harvest surveys (Sill and Cunningham, *in press*). In the 2017 Tribal Needs Assessment, 83% of respondents indicated that their household would consume more herring eggs if they were available (McDowell Group, 2017). Proposal 94 is simply “moving the goalposts” in an attempt to mitigate a legitimate concern of subsistence harvesters.

**Table 1.** Subsistence Harvest of Herring Roe in Sitka Sound, 2002-2016. Data are not yet available for 2017. Data from Sill and Cunningham, *in press*. Note the frequency with which the ANS has not been met in recent years.



Year	Subsistence Harvest (pounds)	ANS Met?
2002	151,717	Yes
2003	278,799	Yes
2004	381,226	Yes
2005	79,064	No
2006	219,356	Yes
2007	87,211	No
2008	71,936	No
2009	213,712	Yes
2010	154,620	Yes
2011	83,443	No
2012	115,799	No
2013	78,090	No
2014	154,412	Yes
2015	106,998	No
2016	84,554	No

Proposal 94 suggests that the ANS is not being met due to lack of effort on the part of subsistence harvesters. However, ADF&G's herring egg harvester surveys indicate that it is opportunity to harvest, not effort, that is limiting the subsistence harvest. Numerous Tribal elders have testified that herring spawn in Sitka Sound has decreased in duration and amount and become more unpredictable in temporal and spatial distribution (Schroeder and Kookesh, 1990). A few harvesters, deemed "superhouseholds", harvest the majority of herring eggs and then distribute those eggs to many other households (Wolfe et al, 2010; Sill and Cunningham, *in press*). This superhousehold is ubiquitous among many different subsistence resources (Wolfe et al, 2010). Given the role of superhouseholds in the subsistence herring egg harvest, STA believes it is best to measure harvest effort by number of hemlock branch sets rather than number of individual participants.

STA's Traditional Foods Program has harvested herring eggs for distribution to Tribal elders and citizens for about fifteen years. Prior to 2015, STA would typically make approximately 15 sets and harvest 4,000-5,000 pounds of herring eggs. STA made 21 sets in 2015 and harvested 9,600 pounds of roe, a stellar year by all accounts. However, STA made 31 sets in 2016 and 33 sets in 2017 and harvested roughly 3,600 pounds and 1,260 pounds, respectively (Table 2). This pattern is not unique to STA; it is corroborated by ADF&G survey data as well as the testimony





of Tribal elders during Sitka Advisory Committee meetings. In summary, harvesters are making more sets and obtaining fewer herring eggs. It should be noted that the commercial sac roe fishery opted for a co-operative fishery in 2015 and the reduced fishing pressure on spawning herring may have produced a longer, better quality spawn for subsistence harvesters. In 2016, approximately 30% of harvesters stated “resource availability” as the reason for decreased harvests, while over 35% listed “poor quality” spawn (Sill and Cunningham, *in press*). Over 40% listed “working/no time” as the reason they did not attempt to harvest herring eggs; this may be because the spawn suitable for subsistence harvest has significantly decreased in duration (Sill and Cunningham, *in press*; Shroeder and Kookesh, 1990). Survey data are not yet available for 2017. The testimony of Tribal elders and the responses to ADF&G surveys clearly indicate that the current ANS is set at an appropriate level. The inability of herring egg harvesters to meet the current ANS is not indicative of lack of effort, but rather lack of spawn. **Therefore, the Sitka Tribe of Alaska opposes Proposal 94.**

**Table 2.** Subsistence herring egg sets and harvest by Sitka Tribe of Alaska’s Traditional Foods program, c. 2002-2017. Unpublished data.

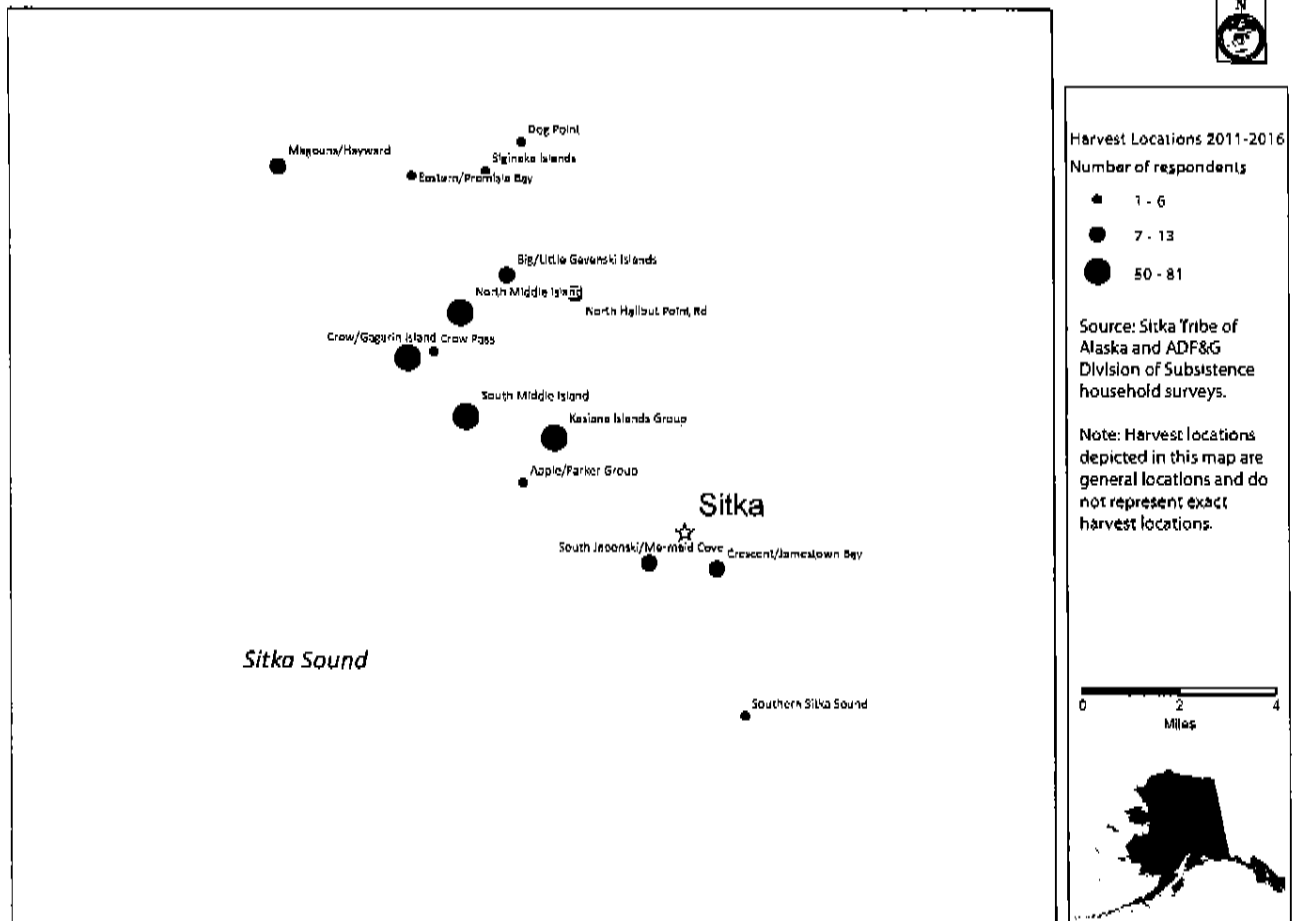
Year	Sets (#)	Harvest (pounds)
c. 2002-2015	approx. 15	approx. 4,000-5,000
2015	21	9,600
2016	31	3,600
2017	33	1,260

### **Core Conservation Area**

ADF&G herring egg harvester surveys began collecting data on harvest locations in 2006 and have consistently indicated the areas around Middle, Crow, Kasiana, and Japonski Islands as the most important and productive for subsistence harvesters (Holen et al, 2011; Figure 1). This area consistently has the greatest concentration of effort in the subsistence herring egg fishery. In 2012, the Board of Fisheries established the “Core Conservation Area” described by 5 AAC 27.150. However, the established protected area was only half of the area indicated by subsistence harvesters. Given that Sitka Sound is the last consistently viable subsistence herring stock in the North Pacific, it is important to protect the Core Conservation Area. The Core Conservation Area should be expanded to match what subsistence harvesters described to ADF&G and is proposed in Proposal 106. **Therefore, STA supports Proposal 106.**



## DIVISION OF SUBSISTENCE - ALASKA DEPARTMENT OF FISH AND GAME



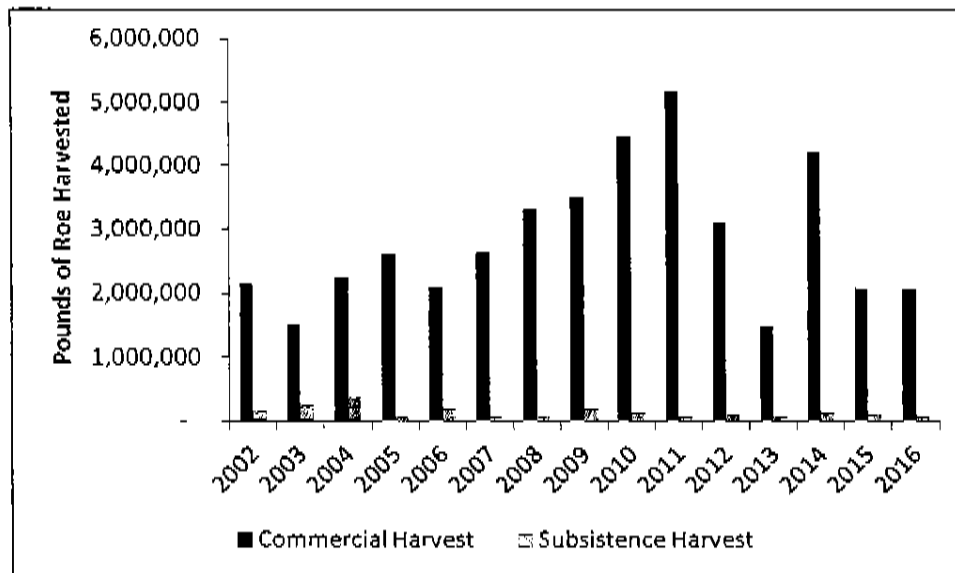
**Figure 1.** Subsistence herring egg harvest locations, 2011-2016. Reproduced from ADF&G staff comments on Proposal 104 (L. Sill, ADF&G, personal communication, 11 December 2017).

Another Board of Fisheries proposal also deals with the Core Conservation Area. Proposal 104 seeks to rescind the Core Conservation Area, saying it is unnecessary for subsistence harvesters. However, ADF&G herring egg harvest surveys and the experience and testimony of Tribal elders and subsistence harvesters strongly dispute this point (Holen et al, 2011; Sill and Cunningham, *in press*). Therefore, STA opposes Proposal 104.

It is also worth considering just how small the Sitka Sound subsistence fishery is relative to the sac roe fishery. Subsistence harvest data are available from 2002-2016 from ADF&G's Division of Subsistence. In that time, the subsistence harvest of herring roe in Sitka Sound has been approximately 5% of the total harvest of herring roe in Sitka Sound (Figure 2). It should be noted that 100% of herring caught in the sac roe fishery are processed, while there is no mortality suffered by herring in the subsistence fishery - those fish may survive to return to



Sitka Sound and spawn again. Additionally, TEK suggests that herring egg survival is poorest for eggs laid more than three feet below the mean low water line and these are the eggs targeted by subsistence harvesters (Thornton et al, 2010). Studies have shown that egg harvest has a lesser impact on herring populations than harvesting the adults (Shelton et al, 2014). Given the small size and benign nature of the subsistence fishery, there is no reason to decrease the ANS or remove protections to the Core Conservation Area.



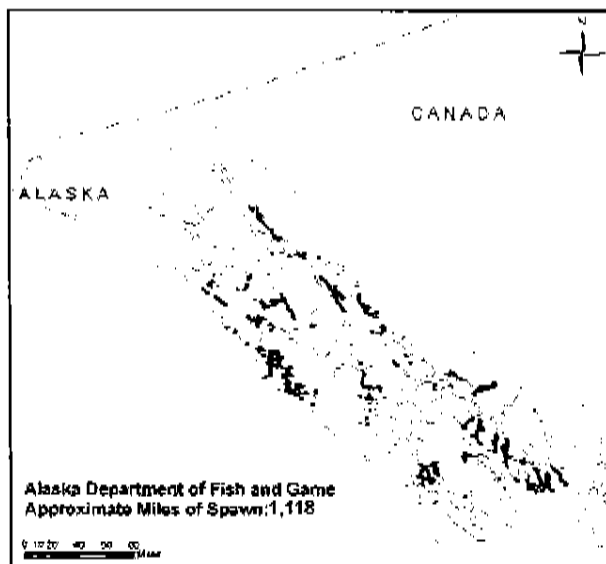
**Figure 2.** Commercial and Subsistence harvest of herring eggs in Sitka Sound, 2002-2016. Subsistence harvest data are not yet available for 2017. Note the small gray bars indicating subsistence harvest. Also note that the subsistence fishery does not cause any additional mortality.

To further illustrate just how large the sac roe fishery is, it may be worthwhile to think about herring as individuals, rather than “tons of product”. The 2017 sac roe fishery harvested 13,923 tons of herring. This amounts to approximately 3,146,598 pounds of herring roe harvested. Based on ADF&G’s pre-season forecast estimate of average size-at-age and age structure of the Sitka Sound stock, this equates to approximately 120,443,641 herring harvested in the 2017 Sitka Sound sac roe fishery (ADF&G, 2016). This is an incredible amount of fish that might have been better left to support other fish species or return to Sitka Sound to spawn again and continue building the biomass of Sitka Sound herring to its former abundance.

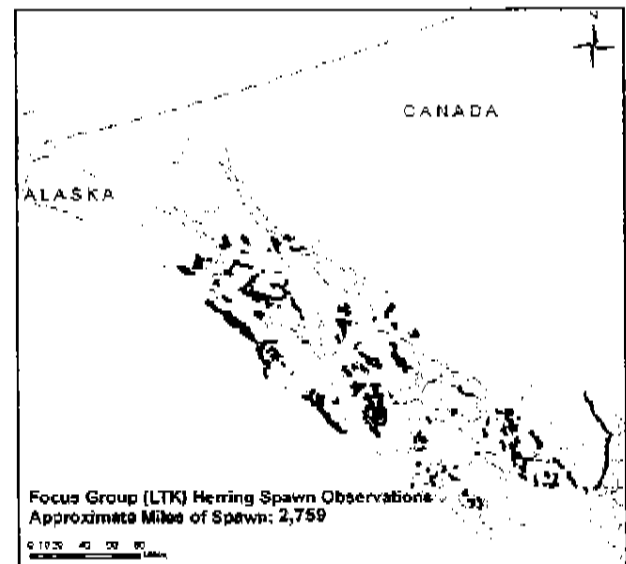
While ADF&G surveys indicate that the Sitka Sound herring stock is growing, STA maintains the population is being managed under a shifted baseline. Traditional Ecological Knowledge (TEK) indicates that herring stocks were previously much more abundant, both in Sitka and throughout the north Pacific (Thornton et al, 2010). TEK suggests there has been a precipitous decline in herring abundance since the start of herring reduction fisheries in Southeast Alaska in



the 19<sup>th</sup> century. TEK also indicates that the duration and intensity of spawning events is decreasing and there has been a considerable contraction in spawning area (Schroeder and Kookesh, 1990; Figure 3). Numerous elders have testified to the former extent of spawn, noting that in the past, every rock and every bay was covered in spawn. For example, ADF&G interviews record TEK stating that unattached eggs would wash up on Sitka Sound beaches in piles two feet deep (Schroeder and Kookesh, 1990). Spawning events now are “flashier”, beginning and ending much more abruptly, and spawn deposition is not as dense as before commercial fisheries began. Nearly all respondents to the 2017 Tribal Needs Assessment were concerned about the Sitka Sound herring stock; 76% were “very concerned”, 16% were “somewhat concerned”, and only 4% were “not concerned” (McDowell Group, 2017).



Linear miles of spawn identified by Alaska Department of Fish and Game (c.1970 - 2007). The data was presented as an image of aggregate data without a specific time span. Using this image, spawning locations were georeferenced using GIS software. The linear miles of spawn was calculated using a function of this software that sums the total miles of coastline identified as spawning locations. Note that some spawning areas are more frequented than others from year to year according to local conditions. For example, Middle Island, in Sitka Sound, has supported significant spawn nearly every year documented, while other areas have supported spawn irregularly or become barren.



Linear miles of spawn identified by consultants who participated in the Herring Synthesis Project (c. 1915 - present). At every focus group and individual interview, maps were provided and consultants were encouraged to identify, and mark herring spawning areas. This data was transferred into a GIS database and miles of linear spawn were calculated using a function of this software. According to these observations, herring spawning areas have covered extensive areas historically and greatly exceed those monitored by the Alaska Department of Fish and Game.

\*LTK data do not include Yakutat, Haines, Klukwan, Hydaburg or Metlakatla; limited data were collected from Wrangell

**Figure 3.** Linear miles of spawn identified by ADF&G (c. 1970 – 2007) compared to TEK (c. 1915 – 2009). Note that TEK identified more than twice as many linear miles of spawn as ADF&G surveys. Reproduced from Thornton et al, 2010.

TEK maintains that spatial distribution of herring spawn is changing. TEK suggests Nakwasma Sound, Katlian Bay, and Aleutkina Bay were all consistently plentiful subsistence herring egg



harvest sites. However, since ADF&G began mapping spawn in 1964, southern Nakwasina Sound has only seen spawn in 22% of years while Aleutkina has only had spawn in 35% of the time. In addition, Aleutkina has declined more in recent years - Herring spawn has been recorded in just six of the last 25 years and just two of the past 18 years. Spawn in Katlian Bay has diminished in terms of total mileage and quality. STA would like to protect all traditional herring egg harvest locations. Therefore, STA supports Proposal 105.

Herring is intimately intertwined with Tlingit culture. Herring eggs are a treasured subsistence food and herring appear frequently in *at.ooow*. Additionally, several places in Sitka have Tlingit toponyms that allude to previous herring abundance. Yaaw X'áat'i is the Tlingit name for Long Island and means "Herring Island". This area of southern Sitka Sound has received herring spawn only 33% of the time since ADF&G began mapping nautical miles of spawn in Sitka in 1964, and only twice in the last ten years. Yaaw Kookk' is the Tlingit name for Herring Cove and means "Little Herring Fish Hole" (Thornton 2012). Herring have not spawned in Herring Cove since ADF&G began collecting data in 1964 and have only once spawned near Herring Cove. Yaww Teiyí means "Herring Rock" and was traditionally heralded as the first place herring spawned in Sitka Sound. Yaww Teiyí was moved for construction of the airport runway. However, this rock now sits in front of the Sheet'ká Kwáan Naa Kahídi, a visceral reminder of spawning habitat forever lost and changes already wrought on the ecosystem and Tlingit culture.

### Guideline Harvest Level

STA firmly believes the Sitka Sound herring stock must be conservatively managed to ensure abundant subsistence harvest and a functioning marine ecosystem in the future. While STA appreciates the efforts of ADF&G staff to estimate herring biomass, STA also believes that estimating herring biomass is an inherently difficult task and far from an exact science. The marine ecosystem is very complex and many factors influence herring populations. For example, juvenile herring survival and ocean conditions are exceptionally challenging to model with any degree of certainty. Currently, there is no way to collect adequate data on ocean survival of juvenile herring, so little is known about the abundance and health of age-1, -2, and -3 herring. Climate change and ocean acidification have already been documented to have negative impacts on Atlantic herring (Frommel et al, 2014). Similar impacts on Pacific herring may not be captured by models in a timely manner. Additionally, it is likely there are "unknown unknowns", factors impacting herring population dynamics that aren't well-known or incorporated into the model. The model also does not publicly publish any uncertainty around the forecast estimate, which may lead to a false sense of security; it would be appropriate to publish data on the precision of the forecast estimate. Lastly, the model is vulnerable to large perturbations that occur in the months leading up to a fishery. The multitude of interactions and uncertainties mean that the model, despite the best efforts and intentions of modelers, may not perform well. And this has proven to be true. ADF&G



estimated the 2012 forecast biomass at 144,143 tons, while the total return was only 77,460 tons. This means that only 54% of the biomass forecast by ADF&G arrived on the spawning grounds in Sitka. The model is not accurate enough to safely protect herring from overharvest.

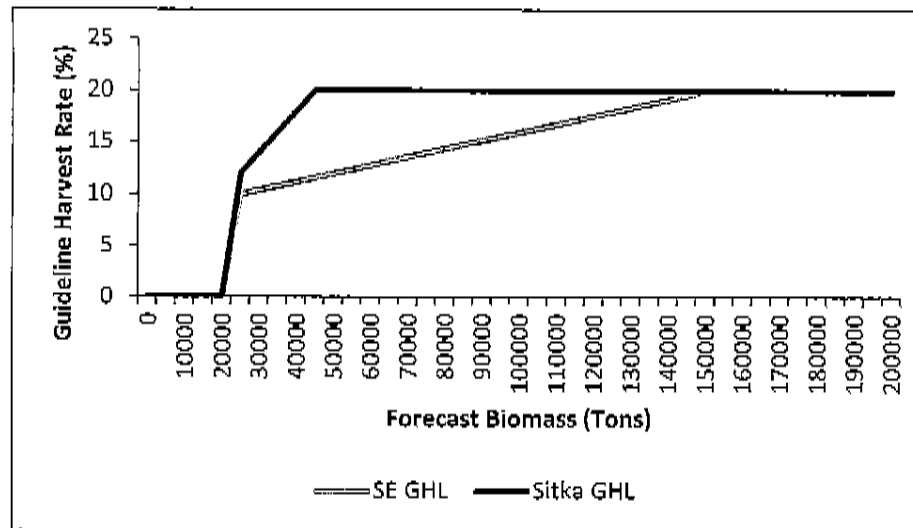
Additionally, there is no way to verify the forecast biomass estimate in-season. If the model significantly overestimates spawning biomass and the guideline harvest level (GHL) is set too high, it may be difficult for ADF&G managers to adjust the harvest in an appropriate manner. To ADF&G's credit, when the predicted spawning biomass did not materialize in 2012, managers did not allow the sac roe fishery to harvest the full GHL. Currently, the spawning biomass is calculated by hindcasting after the season and typically published in December following the fishery. However, it does little good to know that the biomass fell short of forecasts eight months after the season is over. Given the uncertainty surrounding biomass forecasts and difficulty of in-season management, a conservative management approach is imperative.

The current guideline harvest level is set by a sliding scale as outlined in the 2017 Southeast Alaska Sac Roe Herring Fishery Management Plan (Thynes et al, 2017). The Sitka Sound Sac Roe fishery harvest rate is set between 12% and 20% by Equation 1. All other Southeast sac roe fishery harvest rates are set between 10% and 20% by Equation 2. Currently, the threshold level for a Sitka Sound sac roe fishery is set at 25,000 tons (Thynes et al, 2017). Curiously, Sitka's harvest rate equation is not tied to the threshold level, like all other Southeast sac roe fisheries. Additionally, the Sitka Sound formula yields a much more aggressive harvest at lower thresholds (Figure 4). There is no apparent reason for the Sitka Sound formula to be different than all other Southeast stocks.

$$\text{Percent Harvest Rate} = 2 + 8 \left[ \frac{\text{Forecast Spawning Population Size}}{20,000} \right] \text{ (Equation 1)}$$

$$\text{Percent Harvest Rate} = 8 + 2 \left[ \frac{\text{Forecast Spawning Population Size}}{\text{Threshold Level}} \right] \text{ (Equation 2)}$$





**Figure 4.** Southeast GHL calculation as compared to Sitka Sound GHL calculation. Note that the Sitka Sound formula offers a much greater harvest rate between 25,000 and 150,000 tons of forecast biomass.

STA believes both GHL formulas are too aggressive and a more conservative approach is needed to rebuild herring stocks and ensure herring populations are sustainable for future generations. STA proposes capping the guideline harvest level (GHL) at 10% of the spawning biomass. This still allows for a commercial fishery to be prosecuted but offers more protection for the stock, in case forecast estimates are off. In addition, a reduced GHL increases subsistence opportunities and increases the likelihood that stock biomass will grow. Therefore, STA supports Proposals 99.

As a forage fish and keystone species, herring population dynamics have a profound impact on other culturally, ecologically, and economically important species. In 2017, the closure of the commercial and sport king salmon fisheries due to poor ocean survival and record-low returns to Southeast systems disrupted the livelihoods of a number of commercial, charter, and sport fishers. ADF&G has already predicted king salmon will again be “in short supply in 2018” (Woolsey, 2017). There are likely many factors contributing to poor ocean survival and dismal returns of king salmon. Declining herring populations may be one factor, as herring are a major component of king salmon diets and lack of prey has been implicated in poor returns in other king salmon systems (Thayer et al, 2010). Studies have shown that herring can constitute 60% of the biomass of a king salmon’s diet (Fresh et al, 1979; Environment Canada, 1998). Herring are also important prey for coho salmon and halibut, constituting 58% and 53% of their prey, respectively. (Environment Canada, 1998) Herring directly and indirectly support a number of other important subsistence species and STA fears that further depletion of herring stocks will result in negative impacts on those populations.



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In summary, the Sitka Tribe of Alaska supports Board of Fisheries (BoF) proposals 99, 105, and 106. The Sitka Tribe of Alaska opposes Board of Fisheries (BoF) proposals 94 and 104. Thank you for your thoughtful consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathy Hope Erickson', with a long horizontal flourish extending to the right.

Kathy Hope Erickson  
Chairman

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Submitted By  
Sonia Ibarra  
Submitted On  
12/15/2017 12:13:31 PM  
Affiliation  
University of Alaska Fairbanks

Dear Board of Fish,

I am writing in support of proposal 99 to reduce the sac-roe guideline harvest to 10% of biomass. Herring are a critical forage fish that are better left in the water to support our marine ecosystems and subsistence roe harvests. I strongly support proposal 99 because it would increase the amount of mature herring left in the water where they belong. Local and traditional knowledge from Southeast Alaska harvesters including elders, strongly demonstrates that the herring sac roe fishery is an overharvested stock.

See [http://herringynthesis.research.pdx.edu/final\\_docs/HerringSynthesisFINAL102410.pdf](http://herringynthesis.research.pdx.edu/final_docs/HerringSynthesisFINAL102410.pdf) for a detailed account of historical observations that extend beyond ADFG's current scientific understanding of what historical herring levels use to be. Current ADFG size at age data that are used to do stock assessments are not adequately validated and recently underwent major reanalysis that required trained agers to reage thousands of scales.

Sincerely,

Sonia Ibarra



# Southeast Alaska Fishermen's



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December 27, 2017

Alaska Board of Fisheries

John Jensen, Chair

PO Box 115526

Juneau, AK 99801

## **RE: 2018 Southeast Shellfish, Groundfish, and Finfish Proposals**

Dear Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) represents our 300 + members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. Prior to submitting our comments, we sent out an online survey to our members regarding several of the shellfish proposals and encouraged that they share the survey with non-members to help develop our positions on the proposals. Our comments on individual proposals are presented in numerical order by fishery for convenience.

### **DUNGENESS CRAB**

#### **Proposal #53: No position at this time, additional information needed**

This is a proposal submitted by ADF&G to clarify regulations related to the sale of buoy tags for the commercial crab fisheries in Southeast Alaska. We have concerns about unintentional enforcement issues arising from these changes. We are in the process of setting up an evening meeting (hopefully the first night) during the Board of Fish meeting to discuss this proposal with the Department and enforcement issues regarding buoy tags. The Dungeness crab buoy tags were originally issued to the vessel because of the tiered permit system and the ability to stack several permits up to 300 pots maximum. *As the intent of this proposal is to try and align the regulation with current practices, we would suggest that 5 AAC 32.126(b) be additionally amended to read:*



(b) Identification tags are issued on a schedule determined by the Department [BEFORE EACH FISHING SEASON], are uniquely numbered for each registration period [year], and will be issued . . . Tags shall be renewed on a schedule determined by the Department [annually] at the time of registration before each fishing season.

**Proposal #54: Oppose**

This proposal submitted by an individual would reduce all tiers of Dungeness crab permits by 20% for a maximum number of permits per vessel at 240 pots. Most fishermen agree that the productive grounds for fishing have been reduced due to sea otter predation and the remaining grounds are getting more crowded with gear. While it appears that there is more support this cycle that the previous two cycles for reducing the number of pots, *overall the fleet isn't ready for pot reduction to take place.*

**Proposal #55: Oppose**

This proposal would increase the maximum number of Dungeness pots allowed per vessel to 400. Contrary to the intent of the proposal, this proposal would significantly increase the number of pots in the fishery. It appears the intent of this proposal was to allow more permits to be stacked on a vessel consolidating the fishery by number of boats actively fishing by allowing more pots to be fished on an individual vessel but less than what the current tiered permit levels are. CFEC regulations limiting the SE Dungeness crab fishery developed the tiers as a percentage of the number of maximum pots allowed by the Board of Fish **(20 AAC 05.764)**. If the maximum number of permits was increased to 400, a tier A permit would automatically go to 400 pots (100%), a tier B permit would be 300 pots (75%), a tier C permit would be 200 pots (50%) and a tier D would be 100 pots (25%).

**Proposal #56 Oppose**

This proposal is requesting that Twelve-mile Arm be closed to commercial fishing for Dungeness crab. SEAFA is opposed to closing any additional waters for Dungeness crab fishing without adequate justification of biological conservation concerns or the chronic inability to meet the subsistence and personal use needs of local residents. If the Board decides additional area should be closed to commercial fishing to benefit personal use fishing near a community, SEAFA feels strongly that the area needs to be closed for sport fishing at the same time. If an area around a community needs protection for subsistence and/or personal use needs, then the



area needs to be reserved for those residents and not non-resident sport fishermen and the commercial fishery.

### **Proposal #59 Oppose**

This proposal was submitted by ADF&G and would close the Yakutat Dungeness crab sport fishery. Currently the Dept. has been issuing emergency orders every year to close this fishery. We oppose the permanent closure because we hope that eventually the Dungeness crab fishery will recover and that a fishery will be allowed. By closing the fishery permanently, it prevents the re-opening until the next board of fish cycle occurs (including the commercial fishery) when it appears that recovery has occurred.

### **Proposal #60 Oppose**

This proposal would establish a guided sport ecotourism Dungeness crab fishery in Sitka Sound. SEAFA opposed the George Inlet ecotourism crab fishery and we oppose this fishery. The Sitka Sound fishery is not that strong due to sea otter predation and continually handling the crab that do exist in the area does not help rebuild the resource. We do not believe that fisheries with low abundance should be subject to excess and repeatedly handling of crab.

### **Proposal #235 AMEND and then Support**

SEAFA has been on record for a long time supporting 3S management (size, sex and season) for the Dungeness crab fishery. We believe that the Board generated proposal should be amended to include the extended fall season in District 1, District 2 and Section 13B except the waters of Sitka Sound Special Use area to February 28<sup>th</sup>. While there are not a lot of participants in these three areas between December 1 and February 28<sup>th</sup>, it is a well-established time frame that is important to those participants and their customers for the fresh crab. In addition, the Board generated proposal deletes the language that allows commercial Dungeness crab fishing in the fall season in the 13B Sitka Sound Special Use Area described in 5 AAC 32.150(10) and the waters of Whale Passage. The compromises to allow the area to be open in the fall and not the summer season has been long debated at Board of Fisheries meetings between different user groups and a compromise of a fall commercial season finally agreed upon.

### **The regulation would read:**

**5 AAC 32.110. Fishing Seasons for Registration Area A.** In Registration Area A, male Dungeness crab may be taken or possessed only as follows:





- (1) from 8:00 a.m. June 15 through 11:59 p.m. August 15 and from 8:00 a.m. October 1 through 11 :59 p.m. November 30, in all waters of Registration Area A other than those waters specified in (2) and (3) of this section;
- (2) From 8:00 A.M. October 1 through 11:59 P.M. November 30, in the waters of
  - (A) Section 13-B that are in the Sitka Sound Special Use Area described in 5 AAC 32.150(10);
  - (B) Whale Passage North and West of a line extending from 56° 05.65' N. LAT., 133° 07.30' W. LONG. TO 56° 05.85' N. LAT., 133° 06.40' W. LONG.;
- (3) From 8:00 A.M. October 1 through 11:59 P.M. February 28, in
  - (A) District 1;
  - (B) District 2; and
  - (C) Section 13-B, except the waters of Sitka Sound Special Use Area described in 5 AAC 32.150(10)].

## **KING AND TANNER CRAB**

### **Proposals #61 & 62 Support**

We support this proposal to make the Southeast and Yakutat waters match other areas of the state by allowing fishing to occur to 200-mile offshore instead of ending fishing at the 3-mile limit. The state has management authority out to the 200 miles and it makes sense to take advantage of this opportunity. This is a common practice around the state including such areas as Kodiak.

### **Proposal #63 Support**

SEAFSA supports this proposal that would allow an opportunity to gather additional information and data on red king crab stocks by implementing an exploratory commercial red king crab fishery in the Southern Districts. We are generally supportive of efforts to improve data on crab in Southeast, which tend to be under-studied species.

### **Proposal #64 Support**

SEAFSA supports this proposal that would create a red king crab equal quota share fishery when the 200,000-pound harvest threshold is not reached but the estimated harvestable biomass is at least 50,000 pounds. This opportunity would provide an important economic boost to the state and fishermen invested in this fishery. In addition, allowing a fishery to occur would help collect additional data on this fishery that is important to both the commercial and the personal use sectors. We believe that ADF&G working with industry through the King and Tanner task force would be able to find a way to manage the fishery to alleviate the concern of individual



area GHL's from being exceeded using the tools they currently have. In our informal online survey, 57% of the respondents for this question supported the proposal.

### **Proposal #65 Support**

SEAFA supports this proposal to clarify that all king and Tanner grounds are open unless specifically listed as closed waters for a biological reason. Closing these waters was an oversight when ADF&G and industry worked together to move from using salmon statistical areas to redefining areas based on crab movement and fishing patterns.

### **Proposal #66 Support**

SEAFA supports this proposal to allow a Golden king crab area closure to be delayed for weather. This protection is a safety measure like the delayed opening for weather we currently have in regulation.

### **Proposal #67 Oppose**

SEAFA opposes establishing an automatic closure date for Golden King crab. There is very little effort late in the season but for those that participate in the opportunities it is of an economic benefit to both the fishermen and the State. In the last twelve years, there is only eight area/years which were open past the suggested closure date of November 15<sup>th</sup>. This minimal amount of effort should not prohibit the Dept. from being able to make an assessment of the upcoming fishery in February.

### **Proposal #68 Support**

**This proposal was jointly submitted by SEAFA and PVOA** to address the closed area concerns that occurred prior to the last couple of seasons. Meetings were held with the Dept. to argue against a full-on closure in the East Central and Northern Areas. The Dept. does not have the funds to do any surveys in this area, so the only data the Dept. has to work with comes from the fishery itself. When no fishery is held, there is no data to determine what is occurring. In addition, full closures create a gap in the data series. Our intent to include language from the *Policy on King and Tanner Crab Resource Management* into the *Southeast Alaska Golden King Crab Management Plan* is to acknowledge that there is minimum data available to manage this fishery and the fishery provides the only data. This would provide a minimum amount of data from the commercial in every district each year. We do not believe that by adding this language the Dept. would be prevented from using their Emergency Order authority to close



the fishery for conservation concerns, but would make the Dept. justify the closure more fully and would encourage the Dept. and provide an expectation on the fishermen's behalf that at least a minimal fishery would occur. A fisherman does not stay fishing in an area where there is not adequate resource abundance because the economics wouldn't justify it.

### **Proposal #69 Oppose**

We oppose this proposal submitted by ADF&G to reduce the higher end of the Guideline Harvest Ranges (GHR) for golden king crab in the Northern, Icy Strait and East Central Areas. The data the Dept. used to develop the recommended Maximum Sustainable Yield (MSY) data is the current 17-year time frame and excludes using data that captures the full range of highs (1990's) and lows (1980's) in addition to the current data. In 2009, the Board increased the upper end of the GHR when the fishery was exceeding the GHL/GHR. The fishermen understand that the target is the GHL established each year and not the upper end of the range. We don't believe that changing the range is appropriate as Golden King Crab fishing is very cyclical, and we believe that the fishery will in the future bump up to the higher end of the range. We want the opportunity to harvest crab at that time and not wait for the appropriate Board of Fish cycle to come back around.

### **Proposal #70 Oppose**

SEAFAs oppose the reduction in the number of pots for the Golden King crab fishery. The Dept.'s description of this issue is that it will help ease the fishing pressure on the Southeast Alaska golden king crab stock but we believe that is not what will happen in this situation. With less pots in their string, fishermen will be able to pick through their whole string of pots in one day and will tend to consolidate the pots on more productive grounds rather than spreading them farther out doing the exact opposite of the what the Dept. is trying to accomplish. Additionally, the shorter soak time will cause more handling of crab and escape rings would be less successful in filtering out undersize crab.

### **Proposal #71 Support**

SEAFAs support this proposal to allow the operation of commercial subsistence, sport or personal use pots in the 14 days after closure of SE AK Area commercial tanner crab fishery after putting pots in storage and registration is invalidated. This will make the regulations among crab fisheries consistent.



### **Proposal #72 Support**

We support the proposal to re-define 'non-core' and 'exploratory' areas of the SE AK commercial tanner crab fishery. As with an earlier proposal, this would allow an opportunity for the commercial fleet to provide information and data on areas that have had no effort recently due to the shorter seasons.

### **Proposal #73 Oppose**

SEAFA opposes this proposal to create an equal quota share fishery. The Dept. is able to effectively manage this fishery under the current management plan. Most fishermen do not prefer an equal quota share over a competitive fishery unless the fishery cannot be managed any other way and the alternative is a closure.

### **Proposal #234 Support**

While SEAFA generally does not like the use of Board generated proposals, we support this proposal which would require a personal use fishing permit for the taking of king crab in all areas of SE AK and reduces the daily bag and possession limit. We understand that the Dept. did not have the process completely developed by the proposal deadline for issuing personal use permits online and keeping track of the information. We also support the reduced bag limit. Six king crab is a very liberal bag limit for every day the season is open and with that liberal of a bag limit, the inclination is to take the bag limit you are allowed if they are in the pot. Currently, there is a significant data gap in the amount of king crab harvested in the PU fishery and we support efforts to quantify harvest. Anecdotal evidence suggests that harvest numbers are very high. Managing the resource without adequate information about the removals makes it impossible to manage for optimum sustainable yield.

## **SHRIMP**

### **Proposal #75 No Position / comment**

This proposal requests the personal use shrimp fishery in District 11-A to be re-opened. We do not support re-opening this area if the biological data continues to show conservation concerns regarding the resource. When this fishery reopens it should be tied to a personal use permit and a reasonable bag limit in order to quantify harvest. Additionally, the fishery should be opened to commercial and sport when stocks are able to support a harvest. On page 44 of the [2018 Report to the Board of Fisheries on Region 1 Shrimp Fisheries](#) under management concerns, one of the concerns listed is "Regionwide there is little information available on the magnitude



of non-commercial shrimp harvest. This represents a significant source of uncertainty in shrimp stock assessment”, which is why we suggest a bag limit and permit.

#### **Proposal #76 Support**

SEAFA supports establishing shrimp pot requirements for the sport, personal use and subsistence fisheries that will protect juvenile shrimp by allowing them to escape the pots.

#### **Proposal #77 Support**

SEAFA supports the Dept.’s proposal to amend shellfish methods and means and repeal the sportfish abalone regulations which are no longer necessary as the fishery is closed.

#### **Proposal #78 No comment *at this time***

We do not have a definitive position on the rearrangement of the district boundaries until we have had a chance to review Dept. comments and review a map. Our initial read is that this proposal seems reasonable. We **oppose the portion of the proposal that lowers the GHR** in the rearrangement of areas. Currently Districts 6, 8 & 10 have a combined GHL of 168,000 pounds of spot shrimp, and the new sections have a combined GHR of 155,000 pounds which results in a loss of 13,000 pounds.

#### **Proposal #79 Oppose**

SEAFA opposes this proposal to change the commercial fishing season for pot shrimp. Once a shrimp becomes a female they are egg-bearing 10 months of the year. The eggs are just not always as visible as they are in the fall. The fall fishery produces a very good quality frozen product. Other times of the year the shrimp will freezer burn really easily or be mushy. From past experience when the fishery was open 12 months a year, the females tend to release their eggs in the Feb-March time frame and for the time period after this molt, the shrimp are soft shelled until the shell is firmed up in late summer. Fishermen involved in the shrimp fishery are usually diversified in several fisheries. The fall timing of this fishery is such that there are minimal conflicts with other fisheries other than Dungeness crab fall fishery which also opens on October 1<sup>st</sup>.

#### **Proposal #80 Oppose**

SEAFA opposes this proposal making changes to the shrimp management plan. The reduction



of the number of small pots vs. large pots is unequal and is not needed at this time. The request to limit the number of pots per string and the exact distance pots are spaced creates an unnecessary enforcement complication and serves no useful purpose. The idea of requiring only one pot pull per day has been discussed at the previous several board meetings. Similar proposals have not been adopted and are opposed by the industry.

#### **Proposal #81 Oppose**

SEAFA opposes this proposal to require one pot pull per day. See above proposal.

#### **Proposal #82, 83 & 84 Oppose**

SEAFA opposes closing areas to commercial fishing without adequate justification. Any area closure for commercial fishing to protect the resident subsistence and personal use fishing should also close sport fishing in the same area.

#### **Proposal #85 Support**

SEAFA supports the Dept.'s suggested expansion of the shrimp beam trawl log book requirements to cover all fishing areas.

### **HERRING**

We are not commenting on specific herring proposals. We would like to comment on the action taken at the work-session on non-regulatory proposals. The Board decided to write a letter to CFEC to allow open herring pounding by Sitka sac roe herring seine permit holders in Sitka Sound. This issue was agreed to be discussed during the SE finfish meeting. We oppose writing another letter to CFEC as it is unnecessary. At the last SE Board of Fish cycle, the Board wrote a letter requesting CFEC to hold a hearing on this issue. CFEC started the process by determining that there is a limited entry permit that authorizes herring pound fishing in the Sitka Sound area. Following that information, they held a hearing to determine if the Sitka Sound area was appropriately designated in the Northern SE pound permit. After the hearing, CFEC determined that the area designation was correct to have Sitka Sound as part of the Northern SE pound permit. That determination ends the discussion. The only way for an open pound herring fishery to come to fruition is for a portion of the Sitka Sound herring sac roe allocation to be shared with the Northern SE pound fishery. *To be clear, SEAFA is not advocating for that option, we are just stating what the path is.*



## **GROUNDFISH**

### **Proposal #113 Support**

SEAFA supports clarification of using groundfish wastage parts (heads, tails, fins and closely trimmed skeletons) from species prohibited from being used as bait in the commercial fisheries in which a limited entry permit is held. Use of the wastage parts for bait more fully utilizes all parts of the fish rather than trying to find an EPA acceptable method of disposing of the wastage.

### **Proposal #116 Support**

SEAFA supports having a daily bag, possession and annual limit for sablefish in all of SE AK and not just Chatham Strait and Lower Lynn Canal as currently exists. The sablefish fishery is at a low level of abundance, and it is important to understand and have accurate accounting for all removals from the fisheries for appropriate management of the resource.

### **Proposal #118 Support**

SEAFA supports matching the Southern Southeast Inside Sablefish fishery to the dates of the Federal sablefish and halibut quota fishery. This common-sense proposal will help fishermen by not forcing them to switch from longline gear in the spring and back in the fall to harvest their Southern Southeast Inside Sablefish.

### **Proposal #119 Opposed *as written* – confusing as to intent**

There are aspects of proposal #119 similar to proposal #118 which we support – including the longer season. When the sablefish fishery reopens on September 1<sup>st</sup>, longliners would not be able to fish until the three pot fishermen have finished fishing. However, there is not a mechanism to determine when that would occur, or is the intent of the proposal that longline **or** pot gear could be fished starting Sept 1 through November 15<sup>th</sup>? Additionally, as of May 2017 CFEC is allowing C61C limited entry sablefish permits to use pot gear in 2018. This allows the 19 longline permit holders to use pot gear in addition to the three sablefish pot permit holders.

### **Proposal #120 Support**

SEAFA supports a longer sablefish season that allows for both pot or longline gear to be used.





Since CFEC addressed allowing C61C permits to use pot gear, having one season for either gear type makes sense. The number of permit holders is low enough in this fishery that they should be able to work together to avoid gear conflicts.

Proposals #121-129 waiting to review staff comments before commenting

## **SALMON**

Before we comment on salmon proposals we would like to point out that SEAFA represents members in all three salmon gear groups (gillnet, troll and seine) and therefore *will limit our written comments so as to not take a position on allocative proposals*. We may provide some historical information on proposals that would disrupt traditional fisheries. *We believe that adjustments for the Southeast Enhanced Salmon Allocation Plan should be taken within THA rather than disrupting traditional fisheries*. We would like to remind everyone that all three gear groups and the sport fishery have significantly benefited from the southeast enhancement projects and that they are important to all fleets.

### **Proposal #130 - #134 – no action**

These proposals should be addressed under the Chilkat and King River Stock of Concern action plans.

### **Proposal #137 Oppose**

SEAFA opposes this proposal to increase the regional resident king salmon possession limit in times of abundance based on the Pacific Salmon Treaty abundance index. It is imperative that ADF&G maintains the flexibility and ability to manage for low abundance in our local stocks as regardless of the treaty salmon abundance index. It is also critical that management actions are not tied solely to the treaty index. For example, sport fishermen after this king salmon closure in late summer wondered why when restrictions were lifted from no king salmon fishing allowed, the Dept. allowed two rods for winter king fishing instead of being more conservative and allowing for a single rod as would be required at a lower treaty king salmon abundance index.

### **Proposal #138 Regulation Clarification would be appropriate**

SEAFA agrees that there is a gray area within the regulations about having to release a rockfish



when a resident is fishing with two rods in late fall/winter for directed king fishing. Additionally, as the end of the coho season overlaps with the start of the winter king fishery, is it appropriate to retain coho salmon incidentally caught when king fishing.

#### **Proposal #149 Support**

SEAFA supports allowing the Deep Inlet SHA to remain open by regulatory language through October 31<sup>st</sup>. This allows all gear groups to benefit from NSRAA's ability to collect broodstock and/or harvest in Deep Inlet without the need to have an emergency order (EO) issued each year.

#### **Proposal #150 Support**

SEAFA supports expanding the Crawfish Inlet SHA as described and submitted by NSRAA for the reasons they listed.

#### **Proposal #151 Support**

SEAFA supports this proposal to reestablish a Carroll Inlet THA for the reasons described in the proposal submitted by SSRAA.

#### **Proposal #152 Support**

SEAFA supports this proposal to update area description and coordinates of the Anita Bay THA with the placement of the markers.

#### **Proposal #153 General comments**

Adoption of proposal #153 to repeal the District 1 Pink Salmon Management Plan would significantly disrupt one of the traditional gillnet fishing districts. In the issue statement, it states that gillnet opportunities were significantly less than they are today. However, that is why the gillnet fleet was able to successfully argue in front of the Board of Fish prior to 1984 to develop a management plan that allocates the resources between the salmon net fleets so the area management biologist is not put in the position of determining allocation by time given to the two net fisheries. Additionally, the gillnet fleet is below their pink and sockeye management guidelines<sup>1</sup> as stated in **5 AAC 33.363. Management guidelines for allocating**

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<sup>1</sup> 2017 salmon task force documents page 3 <http://seafa.org/wp-content/uploads/2017/11/2017-Task-Force-Handout-value-and-participation.pdf>



**Southeast Alaska pink, chum, and sockeye salmon between commercial net fisheries.** During the weeks of the pink salmon management plan, the gillnet average harvest is 75% pinks for the last ten years and is overall the dominant species harvested in this district by the gillnet fleet<sup>2</sup>.

#### **Proposal #154 General Comments**

The Lower Clarence Strait Pink Salmon Management Plan was repealed in 1989. The 1989 Board of Fish meeting was very contentious between the two net fisheries. Several plans were implemented and repealed during this meeting, but the seine and gillnet fleets have for the most part lived in agreement with the decisions made at that time. **5 AAC 33.363.**

**Management guidelines for allocating Southeast Alaska pink, chum, and sockeye salmon between commercial net fisheries** was also developed at the 1989 board meeting as well as the Northern Southeast Seine Management Plan (5 AAC 33.366).

#### **Proposal #160 Support**

**SEAFA submitted this proposal in conjunction with USAG** and supports clarifying that some AWC listed streams with the presence of salmon are exempt from the 500-yard closed water regulation. This proposal came about after discussions at the gillnet task force meetings where several possible solutions were discussed but no definitive solution reached. These Terminal Hatchery Areas (THAs) were set up carefully with consideration of wild stock interceptions through the RPT and Board of Fish process. *What is not clear is if the 500 yards around these AWC streams in the THA are automatically exempt, or only exempt if specifically stated in the EO by the Dept., or is the 500 yards around the stream mouth enforceable?* In some cases, such as Boat Harbor, the area inside is so small that it makes a fisherman choose to not fish in this area that is open seven days a week because they could get a violation against themselves and demerit points issued against their permit by being too close to a stream. All the streams in this proposal are listed as having the presence of salmon and not as a rearing or spawning habitat.

#### **Proposal #161 Support**

SEAFA supports this proposal to update the regulatory description of Whitewater Bay.

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<sup>2</sup> Information confirmed with Ketchikan area management staff



### **Proposal #164 & 165 Support**

SEAFa supports these two proposals to update the descriptions of closed waters of the Situk, Tsiu and Tsivat Rivers in the Yakutat area.

### **Proposal #166 Oppose**

SEAFa opposes this proposal to substitute an index fishery in place of the test fishery in District 112-16 after listening to ADF&G at the 2017 salmon task force meeting. It was our understanding that it would be possible to end up with years of no data with an index fishery when they did not see enough pinks to open a competitive commercial fishery. The test fishery is what gives the Dept. the comparable data to determine that there is sufficient salmon along this shoreline to open a fishery and what species are present.

### **Proposal #168 no action**

This proposal is best addressed under the Chilkat and King Salmon River stock of concern action plans.

### **Proposal #171 Support**

SEAFa supports providing ADF&G the additional management tool of a 6" maximum gillnet mesh size through the month of July to District 6 as exists for Districts 8, 11, & 15.

### **Proposal #175 Support**

SEAFa supports the Dept.'s request to clarify that king salmon may not be on board vessels participating in the enhanced chum salmon troll fishery when the directed spring king salmon troll fishery is closed.

### **Proposal #176 Support**

SEAFa supports this proposal to allow the ability of trollers to fish in the Crawfish Inlet THA during the troll coho closure. The troll fleet is behind on their allocation under the SE AK Enhanced Salmon Allocation plan and troller access to Crawfish Inlet is a priority for the NSRAA Board.

### **Proposal #185 Oppose**

SEAFa opposes this proposal to allow personal use fishing additional gear types such as drift



gillnet and multiple line troll gear in all districts open to commercial salmon fishing. We believe that these gear types must be carefully chosen for the appropriate areas and not given a blanket allowance. At one time, gillnets were allowed in Gilbert Bay (Port Snettisham) and later rescinded. It was observed that personal use fishermen using drift gillnets were not keeping the first **XX** number of fish harvested, but wasting one species of salmon in pursuit of another species. In many cases, personal use gillnets were abandoned because they were too full of pink salmon.

#### **Proposal #186 Support**

SEAFA supports a definition for a “guest” in relationship to 5 AAC 77.027 Prohibitions for use of personal-use taken shellfish. We support closing this loophole of being able to consider an individual who is paying for a service as being considered a guest in the establishment. Personal use should be tightly regulated as to being used in the private residence of the individual’s household who harvested the resource. Too much personal use resources are given away and not accounted for.

#### **Proposal #188 Support if AMENDED**

This proposal submitted by the Dept. allows for a personal use harvest of hatchery origin fish at Ketchikan Creek. However, what isn’t addressed is the length of the net that may be used in this fishery that is being developed. The personal use regulations do not define the length of a personal use net and 5 AAC 77.683 totally prohibits the use of nets, so it doesn’t have a length specification. (We would recommend not greater than a 90 feet/15 fm gillnet. Any longer than this and the average personal use fishermen can’t handle them.) We would additionally suggest a permit and reporting be required so that data can be accurately gathered.

#### **Proposal # 195 & 196 Support**

SEAFA has supported this request by the Southeast Subsistence Regional Advisory Council previous years to develop an annual limit for nonresidents at two times the daily bag limit for sockeye salmon in salt and freshwater. We feel that the request is reasonable and will help establish reasonable expectations regarding harvest.

Thank you for this opportunity to allow us to comment on the proposals for the Southeast shellfish and finfish meeting. We will likely provide additional comments after staff comments are available for review and comments on the stock of concern action plans. SEAFA looks



forward to an opportunity to participate in the committee of the whole for the salmon, crab, shrimp and groundfish species for which we represent our membership.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen  
Executive Director



Submitted By  
Samantha Weinstein  
Submitted On  
12/28/2017 1:51:29 PM  
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Southeast Alaska Guides Organization

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The Southeast Alaska Guides Organization (SEAGO) is a non-profit dedicated to the sustainability of the guided sport fishing industry in Southeast Alaska. We work to promote the tradition of sport fishing in Southeast Alaska through reasonable regulations that ensure the long-term sustainability of our members' businesses and fish resources. In times of low abundance, SEAGO places conservation of stocks first and supports conservative harvest opportunities which can be accomplished with minimal damage across all user groups. In the long run, we must all act to support the health of the stock to continue operating.

**Proposal 116:** Establishing an annual limit for sablefish outside Chatham Strait

SEAGO is opposed to this proposal to place an annual limit on the harvest of sablefish outside Chatham Strait. Neither the proposer nor the Department of Fish & Game has cited any conservation concern for the species. There is no indication that an annual limit would provide more accurate harvest information or measurably reduce overall harvest. In fact, the Department removed annual limits for areas outside Chatham Strait after determining that there was not a conservation concern. Furthermore, the sport harvest outside of Chatham Strait is minimal in light of the Gulf of Alaska commercial sablefish harvest.

**Proposals 195/196:** Establishing fresh and saltwater annual limits for sockeye salmon to be twice the daily bag limit

SEAGO opposes these proposals to place an annual limit on the harvest of sockeye salmon as twice the daily bag limit. Neither the proposer nor the Department of Fish & Game has cited any conservation concern for the species. Estimated catch throughout Southeast Alaska has remained relatively consistent over the last ten years, as allowed by healthy run sizes. There is no indication that an annual limit would address concerns that possession limits are being abused, provide more accurate harvest information, or measurably reduce overall harvest. If the proposers have concerns regarding abuses of possession limits or the effectiveness of the Statewide Harvest Survey, these concerns are best addressed by means other than an annual limit on sockeye salmon.





December 27, 2017

**Board of Fisheries  
January 11 – January 23, 2017  
Sitka, Alaska**

Dear Chairman Jensen and Board of Fisheries Members:

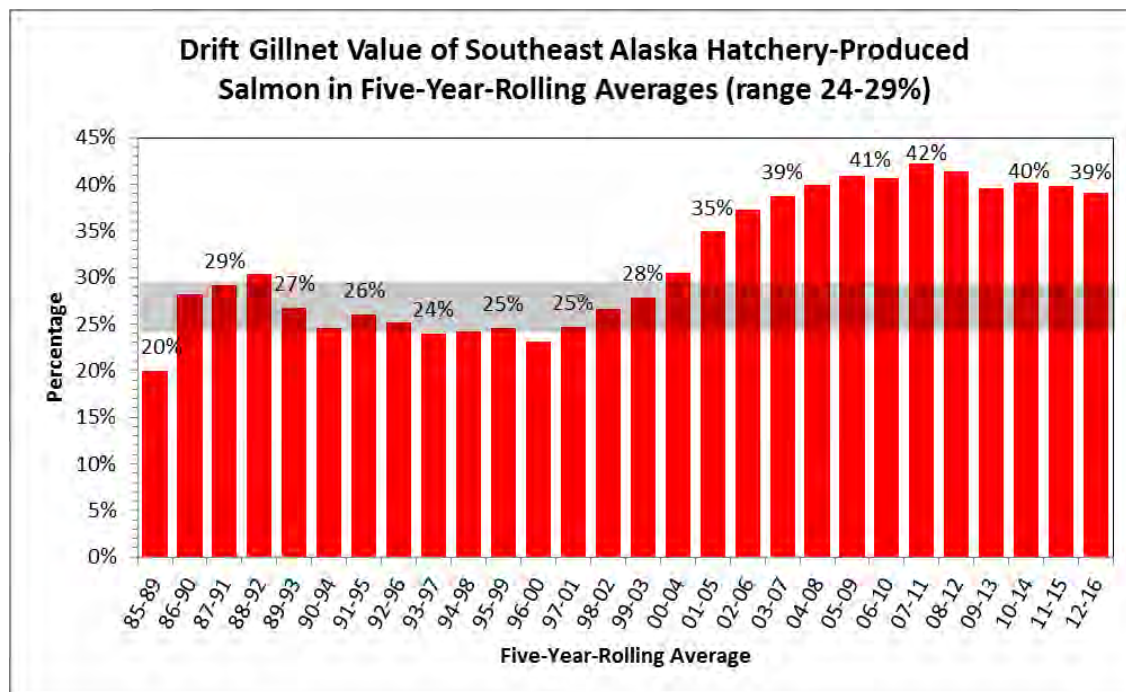
Southeast Alaska Seiners (SEAS) submit these comments on proposals you will be considering at the upcoming meeting concerning fisheries in southeast Alaska. SEAS is a 501 (c) (6) not for profit and represents the interests of seine fishermen, crew, and families associated with salmon seine fisheries throughout southeast Alaska. SEAS members participate in salmon seine fisheries from Ketchikan, Petersburg, Hoonah, Kake, Hydaburg, Craig, Klawock, Wrangell, Sitka and Juneau. 2018 marks our 50<sup>th</sup> year as being a collective voice in advocating on behalf of the industry. SEAS and its members look forward to working with the board this year on proposals pertaining to our longstanding, sustainable, historical fishery here in Southeast Alaska.

**RE: Support for Proposals 140, 142, 143, 145, 149, 150, 153, 155, 159, 166 174 176; Opposition to Proposals 139, 141, 146, 154, 156, 157, 158, 167, 168, 169, 170.**

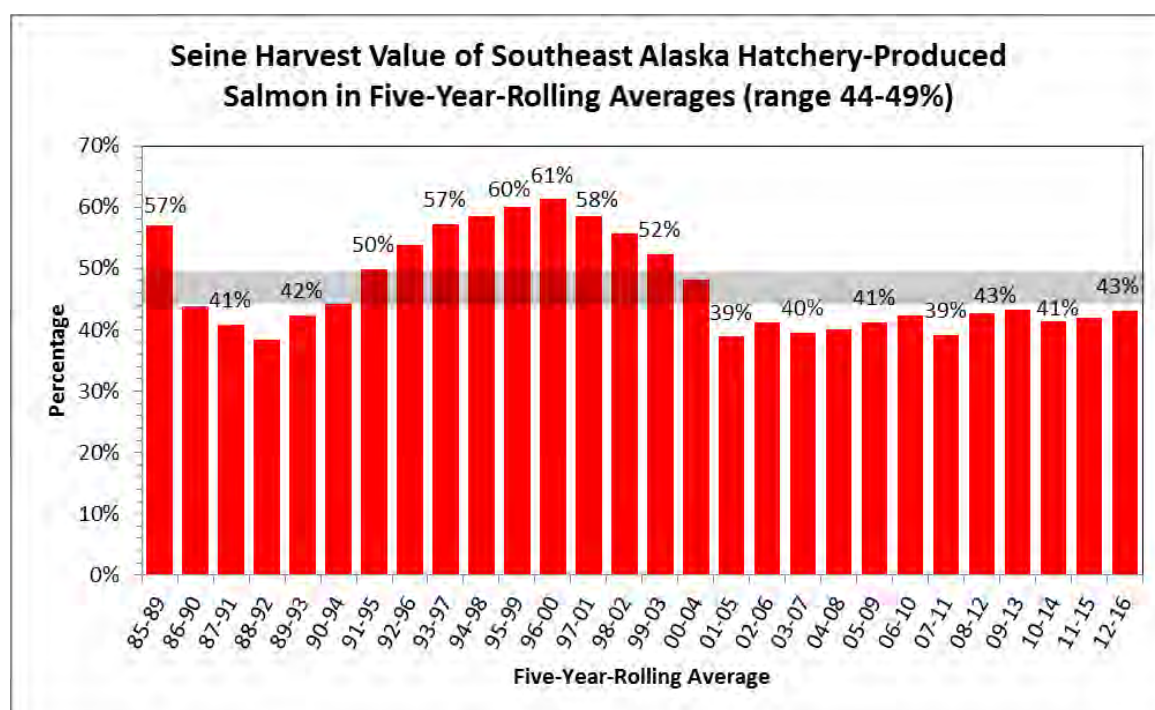
***Proposal 139*** – SEAS is **opposed** to this proposal.

As much as Northern Southeast Regional Aquaculture Association (NSRAA) would like to manage this Terminal Harvest Area (THA) they recently acquired similar to their others, SEAS' position is that these changes would be more appropriately requested next Board of Fish (BOF) cycle. The Gillnet fleet has been above their upper allocation range for fourteen (14) consecutive 5-year rolling averages (Table 1), while the seine fleet has been below their allocation range for thirteen (13) consecutive 5-year rolling averages (Table 2). The expectation that "new" production would solve this imbalance has been the catalyst behind not making major adjustments to THA "sharing" that could have curtailed at least some of this institutionalized imbalance. In light of the last ten year track record, where the gillnet fleet has demonstrated an indifference to any meaningful adjustments, we feel obligated to restrict the possibility of access to this area until such time that this allocation situation has been fully addressed.

**Table 1. (ADF&G) Data presented, April 2017 JRPT. 2012-2016 is Preliminary Data; 2013-2017 5-year rolling average is estimated to be 41% by operators.**



**Table 2. (ADF&G) Data presented, April 2017 JRPT. 2012-2016 is Preliminary Data; 2013-2017 5-year rolling average is estimated to be 40% by operators.**



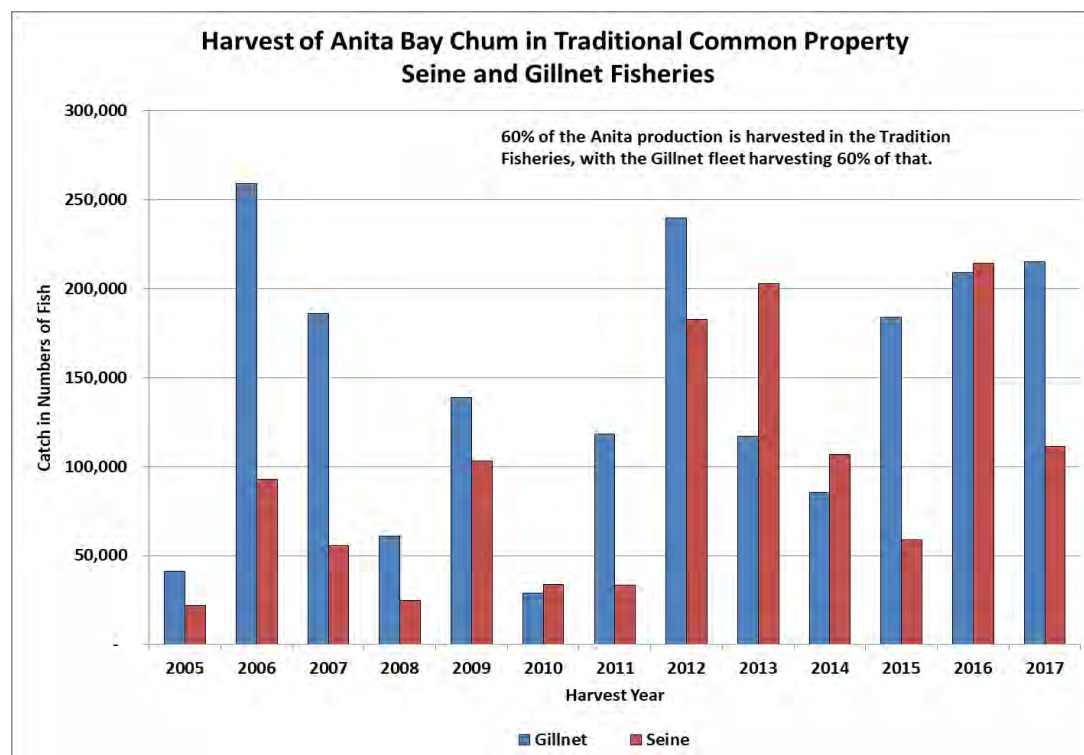
### **Proposal 140 – SEAS supports this proposal.**

This proposal seeks to limit the net fleet access in the Anita THA for the 2018-2020 cycle to solely the seine fleet. The gillnet fleet has been 150% above their allocation range for more than 10 consecutive 5-year rolling averages (Table 1), while the seine fleet has been below their allocation range for thirteen (13) consecutive 5-year rolling averages (Table 2). The promise of new production has kept the seine fleet from asking for BOF assistance sooner. New production that was promised or realized has not balanced allocation issues between the net gears for a myriad of reasons that will be addressed in the proposal comments presented in this document. Any new production aimed at the seine fleet by NSRAA is a BOF cycle away from being realized. The only way to affect immediate change is to restructure the terminal sharing.

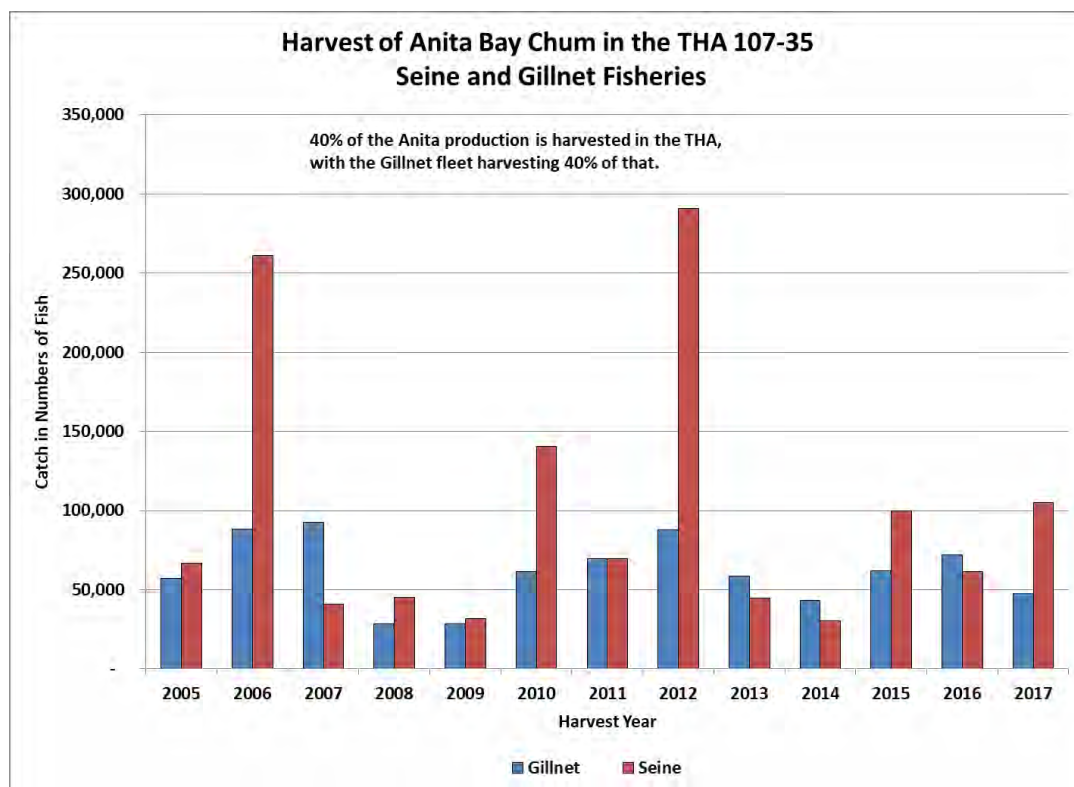
Sixty percent (60%) of the chum production from Anita Bay is caught in the Traditional Common Property Fishery (Table 3), Southern Southeast Regional Aquaculture Association (SSRAA) otolith data. Sixty percent of that harvest is by the gillnet fleet. Of the 40% terminal return, the seine fleet has averaged a 60% harvest share of that smaller proportion (Table 4). The final outcome is approximately a 50/50 sharing of this production. We maintain the position that the gillnet fleet has ample and consistent traditional access to harvest their allocation share of this production without any additional terminal harvest opportunity.

The terminal chum return at Anita has average 400,000 fish. The only years the seine fleet has caught substantially more fish in the terminal area than the gillnet fleet was in 2006 and 2012, where the total return was two times the average and overwhelmed the ability of the gillnet fleet to access them going through their traditional corridors. Examining (Table 3) will show that in those same years the gillnet fleet had the highest and second highest harvest in the time series.

**Table 3. Harvest of Anita Chum Using Otolith Recoveries.**



**Table 4. Terminal Harvest of Anita Chum. (ADF&G) Tag Lab Data.**



SEAS respectfully asks the BOF to exercise the regulation and additional findings (Item 1), listed below in addressing the allocation imbalance.

**Item 1. Allocations regulations and Findings.**

***Under Chapter 33. Article 3. 5AAC 33.364 of the SE Alaska/Yakutat Areas Commercial Salmon Fishing Regulations, section (c); it states – “If the value of the harvest of enhanced salmon stocks by a gear group listed in (a) of this section is outside of its allocation percentage for three consecutive years, the board will, in its discretion, adjust fisheries within special harvest areas to bring the gear group within its allocation percentage.” The gillnet fleet has been above the upper range of their allocation for fourteen (14) 5-year rolling averages, and the seine fleet has been under their lower range for thirteen (13) 5-year rolling averages, Tables 1 and 2, respectively. The gillnet fleet cannot get within their range without taking away their exclusive harvest potential, and the seine fleet cannot get in their allocation range without gaining access to more terminal opportunities, especially in years of low pink abundance. Additionally under Finding #94-148-FB (previously Finding #94-02-FB), number 13 of the fourteen (14) guiding principles it states, “When adjustments are deemed necessary to the distribution of the harvest to meet allocation percentage goals, the following tools should be used: (1) special harvest area management adjustments; (2) new enhanced salmon production; and (3) modification of enhancement projects production, including remote releases. Hidden Falls shall remain a seine/troll terminal harvest area (Consistent with 5 AAC 33.374).***



**Proposal 141** – SEAS is **opposed** to this proposal.

This proposal seeks to encompass two different Management Plans **5 AAC 33.376** Deep Inlet, and **5 AAC 33.383**, Anita Bay, in one proposal. SEAS is against tying decisions in one terminal harvest area with another; and believes to best address allocation adjustments in to the future, each THA should be considered on its own specific merits, such as access of that production to each gear in the traditional common property fishery, for an example. SEAS has already addressed the merits of their proposal for the Anita Bay THA during comments under Proposal 140. In the interest of not being redundant, please view those remarks for opposing the portion of this proposal concerning **5AAC 33.383**.

Management Plan **5 AAC 33.376**. Deep Inlet Terminal Harvest Area Salmon Management Plan. This proposal seeks to structure the time frame in the Deep Inlet THA to 1:1 between net groups for all time frames. While this is a better sharing arrangement than the gillnet fleet was willing to make last BOF cycle, it will not address the allocation imbalance that exists between the net groups. Seiner's agreed to a modest increase in opportunity at Deep Inlet last BOF cycle to avoid bringing it before the BOF and "take our chances" if you will. We made those concessions knowing that the only time frame we acquired as additional opportunity returned a historical 25% of the total return. The bulk of the terminal return, 75%, still gave the gillnet fleet a 2:1 ratio over that of the seine fleet. This despite the fact that the gillnet fleet had been above their upper range for 12 years and the seine fleet had been below for 11 years, (Tables 1 and 2 respectively). SEAS has grown weary of expecting the gillnet fleet to make any impactful adjustments to solve the imbalance with the tools we have at the fleets disposal; this proposal before you is yet another example of their unwillingness to adhere to the allocation agreement and its adjustment tools.

NSRAA has done an analysis of what various rotation schedules would likely deliver based on their historical information; SEAS views this information as the "best" data available to project future harvest potential (Table 5).



**Table 5. NSRAA's Estimated Outcome of Different Gear Rotation Scenarios.**

DEEP INLET THA					
	TOTAL	5-YR AVG %	NET GEAR		
YEAR	RETURN	THA-NET*	HARVEST	POUNDS	VALUE
2018	1,500,000	74%	1,110,000	8,325,000	\$ 5,827,500
2019	1,500,000	74%	1,110,000	8,325,000	\$ 5,827,500
2020	1,500,000	74%	1,110,000	8,325,000	\$ 5,827,500
<b>TOTAL</b>	<b>4,500,000</b>		<b>3,330,000</b>	<b>24,975,000</b>	<b>\$ 17,482,500</b>

\* % of total return caught by net gear in THA. Includes CR; no Deep Inlet CR anticipate for 2018-2020.

**NSRAA's Estimate of outcome of various rotations using best existing data.**

GEAR	YEAR	2:1 GN:SN	1:1 GN:SN	1:2 GN:SN
SEINE	2018 - 2020	\$ 3,733,472	\$ 4,309,767	\$ 5,099,063
GILLNET	2018 - 2020	\$ 2,094,028	\$ 1,517,733	\$ 728,438
<b>TOTAL VALUE</b>	<b>2018-2020</b>	<b>\$ 5,827,500</b>	<b>\$ 5,827,500</b>	<b>\$ 5,827,500</b>
% SEINE	2018-2020	64%	74%	88%
% GILLNET	2018-2020	36%	26%	13%

Value estimates are for each of the harvest years.

This would be a very appropriate sharing arrangement, if the allocation percentage for both net groups started within their allocation range, but that is not the situation. It is not lost on anyone that a sharing arrangement that gives the gillnet fleet 26% of the harvest (which is within their allocation range) cannot address the **CURRENT** imbalance. SEAS' hope is that after this BOF cycle, we could support the 1:1 ratio, because both groups should be closer to their agreed allocation percentages.

**Proposal 142** – SEAS would be willing to entertain supporting this proposal as a compromise between the gillnet position (141) and SEAS own proposal (143). While it will not have as much of an immediate effect on the allocation issue, SEAS realizes the positive economic effect this opportunity has on the local gillnet fleet and processors; and also acknowledges and appreciates the effort and obvious struggle this proposal was for the NSRAA Board.

**Proposal 143** – SEAS supports this proposal

This proposal seeks to change the gillnet to seine ratio in the Deep Inlet THA to a 1:2 ratio. (Table 5), presented in the preceding proposal makes it abundantly clear that our proposal will have an affect toward balancing the allocation between the net groups. It achieves that without eliminating the gillnet opportunity entirely.

The gillnet fleet is 150% above their allocation range (Table 1), while the seine fleet is below the **LOWER** range of the allocation range (Table 2). Subtracting and adding value from one fleet to another on a 5-year rolling average is a complicated and multifaceted exercise which cannot be fully explained in this document. SEAS would welcome a work session with the BOF and other stakeholders to present existing production and how shifts in the terminal areas can or cannot fully address the underage of one



net fleet and the overage of another. Suffice to say that shifting the Deep Inlet terminal sharing time frame to anything less than a 1:2 ratio will have little effect on the allocation ranges. Calculations show that even if all the NSRAA harvest opportunity, which they calculate to be 5.8 million dollars annually if Douglas Island Pink and Chum Inc. (DIPAC) “buy” cost recovery, were to go entirely to the seine fleet, it would not bring them into even their lower allocation range; and the gillnet fleet would remain well above their upper range. Our calculations show that if all the terminal requests that SEAS has asked the BOF to address were enacted, it would take three years to come within the bottom of their range and still the gillnet fleet would be 150% above their upper range. Because the gillnet fleet has been so far above their range for so many years, it will take at least five years to get values that go into calculating the rolling average to drop out of play. SEAS respectfully asks the BOF for their support of this proposal.

**Proposal 145** – SEAS supports this proposal.

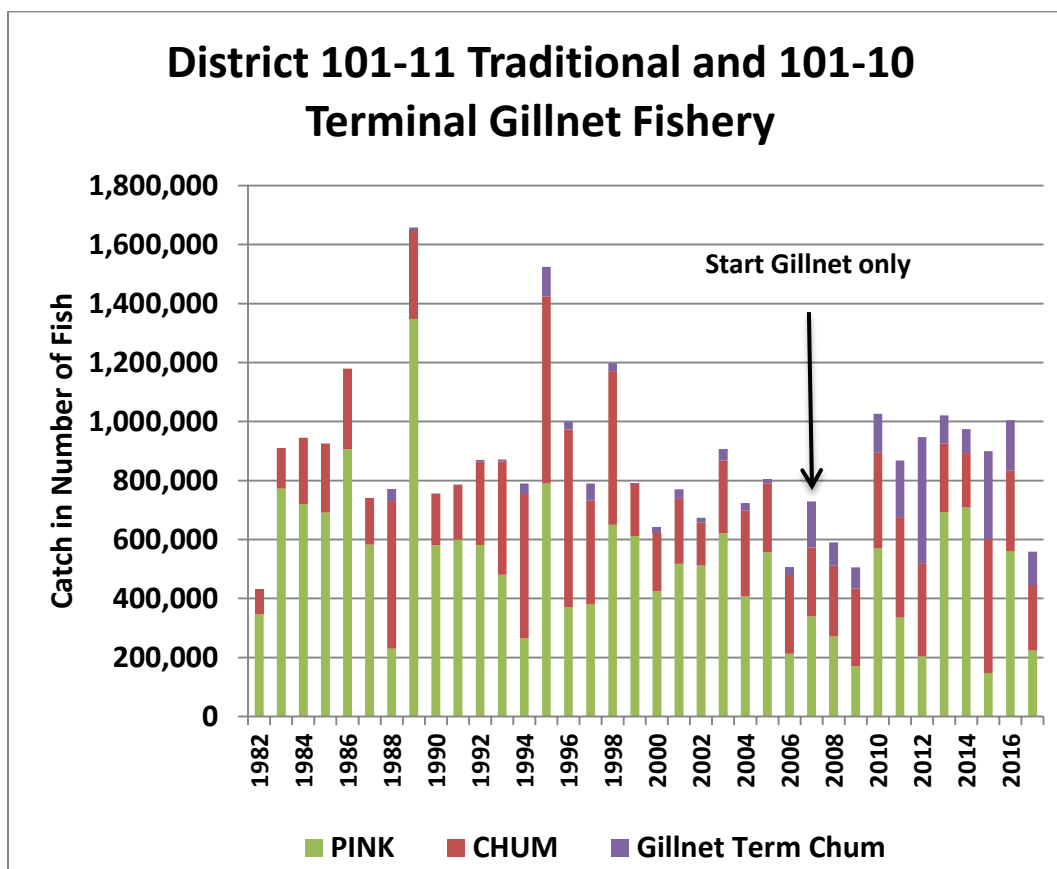
The seine fleet agreed, when they were above their target allocation range, to remove their opportunity to access fish in the Nakat Inlet THA (**5 AAC 33.372**. District 1: Nakat Inlet Terminal Harvest Area Salmon Management Plan.) This agreement was reached based on future production at Kendrick Bay and a host of assumptions that have not come to fruition. This proposal seeks to add back the seine fleet as a potential harvester, and further states that if the gillnet fleet is above their allocation range for the most recent five-year rolling average, the seine fleet will be allowed one day a week to access enhanced fish.

Citing Article 3. **5AAC 33.364** and subsequent Findings (Item1), SEAS respectfully asks the BOF to make changes to **5AAC 33.372** to make allowances for seine activity in this THA when the gillnet fleet is above their allocation range. There has been an assumption that reference to “*out of its allocation percentage...*” in Item 1 means “under”. SEAS would like to offer that percentages that are “above” also meet the qualifications stated in **Article 3. 5AAC 33.364**. The gillnet fleet is 150% above their allocation percentage, and has been above for the last fourteen (14) consecutive years, (Table 1), while thirteen (13) years in that same time frame the seines have been below the bottom of the allocation range (Table 2).

Over 70% of the Nakat release was caught in the 101-11 traditional common property fishery by the gillnet fleet even when the seine fleet had a 1:2 gillnet to seine ratio in the Nakat THA (101-10). There were opinions at the time, that some of the seine harvest in the terminal area would move back out of the area and be caught in the traditional area if the seine fleet was not fishing. Since 2007 when terminal seine activities were discontinued, the traditional split has changed little at 68%. This minimal difference most likely has to do with the increased Canadian effort and catch of these same fish, and SEAS interpretation of the historical data, is that one day a week access in the Nakat THA will not diminish any of the 70% opportunity the gillnet fleet has liberal access to in their traditional fishery (Table 6).



**Table 6. Gillnet Harvest in Traditional and Terminal District 1 Fishery for Pink and Chum. (SSRAA) otolith and (ADF&G) Tag Lab data.**

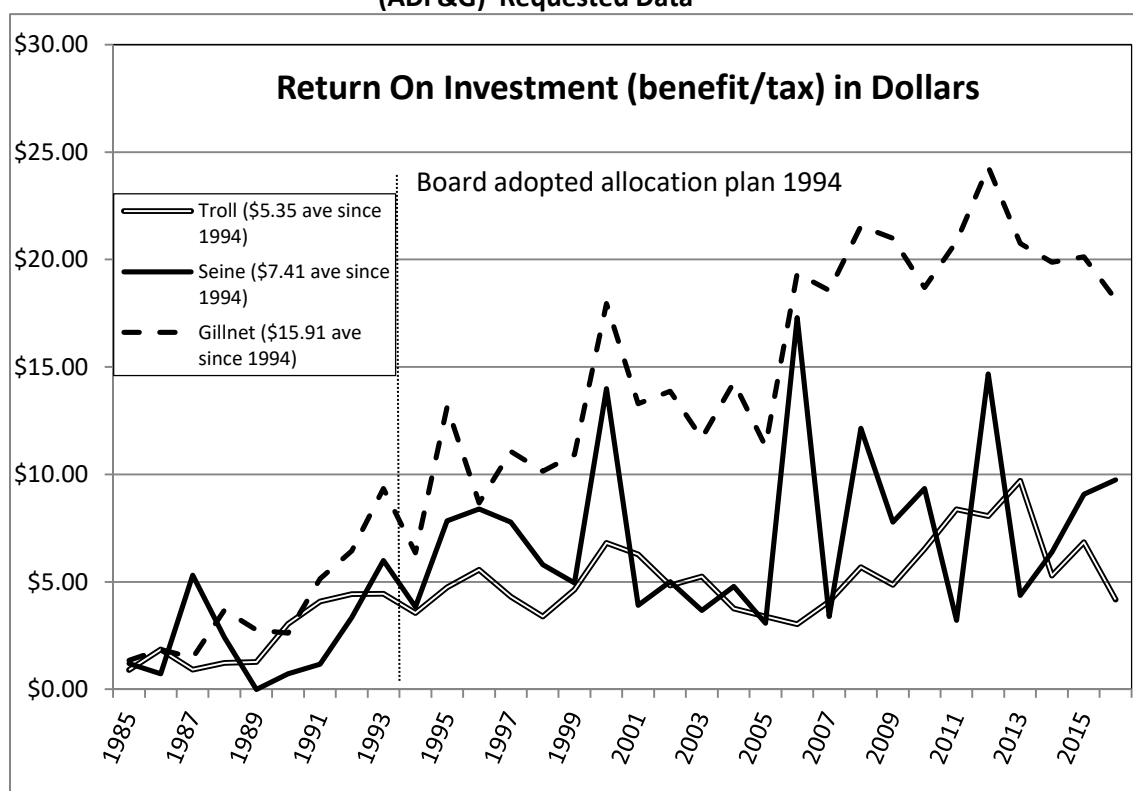


**Proposal 146 – SEAS is opposed to this proposal.**

SEAS would like to offer that contrary to the submitter of this proposal comments, during the Joint Regional Planning Team (JRPT) review process, production from Private Non Profits (PNP's) hatcheries are in fact reviewed. Consideration for how production will affect the allocation percentages is a driving force in the permitting of new hatcheries and additional production requests by existing facilities. PNP's were in existence when this allocation plan was originally adopted and were fully anticipated by the drafters to be included as enhanced production in the calculations. The statement that "... contribution from PNP's is difficult to fully ascertain..." is simply incorrect. DIPAC was the first enhancement entity in Southeast to establish their own otolith reading department independent of ADF&G. DIPAC, NSRAA, and SSRAA all have well established programs for sampling, reading, and calculating contribution estimates to the various fleets. In the ADF&G publication *Hatchery Chum Salmon Contribution to Southern Southeast Alaska Commercial Net Fisheries, 2006–2010* it states, "The information collected by SSRAA forms the most complete data set of its kind in Southeast Alaska, and thus provides valuable insights into chum salmon abundance trends in southern Southeast Alaska fisheries." The PNP's lend assistance to each other to help collect, document, and calculate contribution throughout the region, when applicable, because they understand the importance this information has.

We have driven home the fact that the gillnet fleet has been over their allocative ranges for more than a decade, but let's look at it in a different light in case you think there was some bias or unfairness in the original ranges. Each gear pays into the 3% assessment, whether or not the fish caught are enhanced or not. The seine fleet catches primarily pinks which are not enhanced for the most part in SE Alaska. They pay 3% on all the pinks they harvest, that value in some years is considerable; in fact the seine contribution to enhancement outweighs contributions made by the other gears combined by nearly 120%. The seine fleet has contributed \$50.6 million, the gillnet fleet 17.7 million, and the troll fleet 25.5 million in years 1985-2016. The Return on Investment (ROI) for each of the gear groups was calculated in 2017 by ADF&G, *personal communication* (Table 7). This graph makes it abundantly clear that the gillnet fleet has enjoyed a continual increase in their ROI, especially in the last ten years. For each dollar assessed, the gillnet fleet received \$18.14 in enhanced value, the seine fleet \$9.75, and the troll fleet \$4.17, respectively in 2016.

**Table 7. Return on investment on an annual basis, 2016 data is preliminary from ADF&G.**  
(ADF&G) Requested Data



Seiner's, Gillnetter's, and Troller's throughout Southeast Alaska hatched this idea of enhancement and taxing themselves to pay for it. Those folks put hard earned dollars into a dream they had of stabilizing their collective fisheries when wild runs weren't enough. Most of the founding members never realized a return that exceeded their investment, but had faith in the idea and a hope for a more stable financial future for the next generation. The last ten years average value for enhanced catch has been 43 million dollars, with a high of 71 million. Enhancement in SE has been such a success



story, and should be viewed as a benefit and a blessing, that was intended to be shared with all the gear groups. The bulk of the value is in chum, which primarily goes to the net fleets; these are additional fish that neither gear group had before. While it is understood that these allocations percentage weren't supposed to be exact (they add up to between 95 - 110 %), SEAS would appreciate that no ONE NET GROUP be substantially over their agreed allocation range without making terminal adjustments to compensate where it is possible. This proposal seeks to change the "rules of the game" simply because the gillnet fleet does not like the score. When one team in the NFL has a quarterback that is unstoppable, do teams lobby to have him banned? A preposterous idea; you make adjustments to minimize his effectiveness. Terminal rotation adjustments are our tools for an effective defense against a runaway score. This tool has never been fully utilized, and until such time as it has, we need to keep working with the original "rules".

**Proposal 149 & 150** – SEAS **supports** these proposals

**Proposal 153** – SEAS **supports** this proposal.

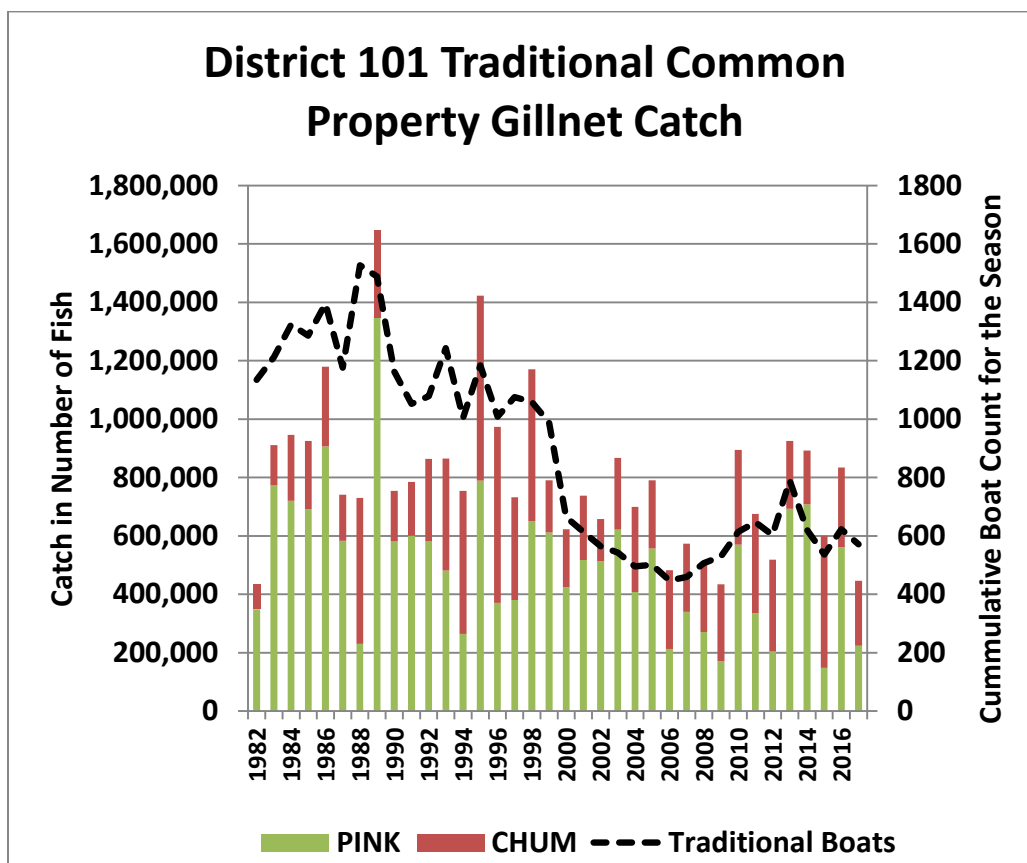
These regulations guarantee a 2:1 gillnet to seine ratio after the 3<sup>rd</sup> Sunday in July for pink opportunity in District 1. When enacted, it was believed that the regulations went both ways, if seine had one day gillnet was guaranteed two days; and if gillnet had two days seine would get one. That is not how the regulation is being interpreted. The gillnet fleet is not regulated in District 1 in any manner by its pink harvest, but by other factors. Whatever the drivers were initially, they no longer exist and this regulation is viewed as superfluous. Regular seine openings provide information to managers and in turn confidence to allow regular gillnet openings. The reverse, however, is not guaranteed from this regulation.

**Proposal 154** – SEAS **is opposed** to this proposal.

This proposal assumes that the lack of pink catch in southern southeast is due to some diminished access opportunity. SEAS would argue that the gillnet fleet uses a net size to harvest whatever species is most abundant in a given year. Referring to (Table 6), it is apparent that when the chum return is low the pink catch is high; and when the chum are abundant there is diminished pink harvest, especially in the last ten years when the price of chum has dramatically increased. Who would target a pink when they could harvest a chum? The value of a pink in 2017 for a gillnetter fishing in D1 was \$1.25 while a chum was worth \$8.11. Let's just agree they are making a good business decision to target chum; and that any harvest underage that may exist is due to behavior, not access.

If you add effort to (Table 6), there is an argument that diminished effort may also have some influence on pink catch in this area, (Table 8). SEAS would seek this request be denied.

**Table 8. Gillnet Harvest in the 101-11 Traditional Fishery.**  
(ADF&G) Requested Data



**Proposal 155** - SEAS supports this proposal.

The District 12 Sockeye cap was not put in place for conservation, it is purely allocative. There are not serious escapement issues for any of the sockeye stocks significantly harvested by the Hawk Inlet fishery. Given that the gillnet fleet has not caught its allowable catch in District 11 of the Taku River Sockeye in 24 of the last 30 years, seiners should be allowed to harvest additional sockeye incidental to harvest of pink salmon in years of abundance. We believe this to be responsible management of the States resources.

Although the current regulation that will sunset allows for the annual harvest of 15,000 wild sockeye, in practice the seine fleet does not get opportunity in this area every year, and the allowed average harvest has been 6,100 fish annually, (Table 9), (ADF&G) *personal communication*.



**Table 9. Harvest of Sockeye since the Establishment of 5AAC 33.366.  
(ADF&G) Requested Data**

Harvest of sockeye salmon that apply to the July harvest limit of sockeye salmon described in 5AAC 33.366

Year	Hawk Inlet Shoreline			Amalga SHA				Total towards July Harvest Limit	
	Total Sockeye	% Enhanced	Wild Sockeye	Total Sockeye	% Enhanced	Wild Sockeye	Wild that apply to July Harvest Limit		
1989	15,032							15,032	5AAC 33.366 established
1990									
1991									
1992	12,529							12,529	
1993	6,120							6,120	
1994	10,323							10,323	
1995									
1996									
1997									
1998									
1999	5,876	17.6%	4,842					5,876	
2000									
2001	10,579	28.0%	7,617					10,579	
2002									
2003	10,186	9.5%	9,218					10,186	Only wild sockeye apply to to the July harvest limit
2004	17,490	30.7%	12,121					17,490	
2005	15,763	36.1%	10,073					15,763	
2006	12,603	9.9%	11,355					11,355	
2007									
2008									
2009	17,401	18.2%	14,234					14,234	
2010									
2011	25,315	20.0%	20,252					20,252	
2012				4,015	n/a				
2013	2,155		2,155	4,429	38%	2,746		2,155	
2014				1,440	37%	907			
2015	16,799	37.0%	10,583	912	17%	757	0	10,583	Only when the entire SHA is open does wild harvest apply to the limit
2016				2,684	51%	1,315	0	0	
2017	17,791	26.9%	13,005	2,689	54%	1,248	1,131	14,136	

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SEAS believes there are better management tools and/or triggers that could more adequately allow for maximizing the State's pink resources while also addressing sockeye catch numbers. We look forward to working with the Department and the BOF in examining various options.

**Proposals 156, 157, 158 – SEAS is opposed to these proposals.**

SEAS will address their comments to these proposals together as the theme and requests are similar in nature and cover many of the same data and issues. First the issue of run timing; at The Seine and Gillnet Task for meetings in Ketchikan November 28 -29<sup>th</sup> 2017; ADF&G presented data on run timing, effort, and catch for the sockeye stocks addressed in this proposal. When the question of run timing was asked, Area Management Biologists in the Juneau area stated that any perceived run timing changes were due to yearly variation of individual stock strength and their contribution to the catch rather than any significant stock timing changes. SEAS would defer to the experts in the Department for any further data specifics.



Second, is the issue of wild sockeye catch in the Amalga SHA. (Table 10) shows the estimated wild stock catch of sockeye by the seine fleet during their limited six hour openings in this area for the entire data series of six years. The number of Chilkat/Chilkoot sockeye in the catch are almost nonexistent. For United Southeast Alaska Gillnetters (USAG) to point to a concern about the average 36 sockeye a year caught in this fishery while they ignore the number and percentage of sockeye they catch in the Boat Harbor SHA is absurd. Over the 23-year time series, the gillnet fleet has an average sockeye harvest of nearly 10,000 (9,985) annually in the Boat Harbor SHA to access chum salmon returning from enhanced releases; and they are concerned with the seine fleet catch of 36 wild sockeye returning to this same area (Table 11)? This data should demonstrate the inconsistency of using any wild sockeye catch in Amalga to limit seine opportunities there. If there is real concern, it would be the fact that in years of lower sockeye abundance to Lynn Canal, i.e. 2008 and 2017, 26% and 20%, respectively (in red Table 11), of the entire sockeye catch in District 15 was from the Boat Harbor SHA. Further examination of the catch data shows that in the time series 1976 – 1994, an average of thirteen percent (13%) of the sockeye catch was in Area 15C prior to a chum fishery there, and since then (1995 – 2017), forty (40%) of the sockeye catch on average has come from this area. SEAS position is that any sockeye cap at Amalga and/or District 12 in light of the un-checked additional sockeye opportunity and harvest in the Boat Harbor SHA, demonstrates a double standard.

**Table 10. Estimated Sockeye Composition of Sockeye Using Otolith and GSI Data.  
(ADF&G) Fishery Manuscript Series No 15-03.**

<b>Amalga SHA - Seine Catch</b>									
<b>Year</b>	<b>Total Sockeye</b>	<b>% Enhanced</b>	<b>Wild Sockeye</b>	<b>Chilkat/Chilkoot</b>	<b>Snettisham Wild</b>	<b>Taku Lakes</b>	<b>Stikine/Taku Main</b>	<b>NSEAK</b>	<b>Other</b>
2012	4,015	n/a		52	562	470	1000	169	88
2013	4,429	38%	2,746	63	659	552	1173	195	104
2014	1,440	37%	907	21	218	182	387	64	34
2015	912	17%	757	17	182	152	323	54	29
2016	2,684	51%	1,315	30	316	264	562	93	50
2017	2,689	54%	1,248	29	299	251	533	89	47
<b>Totals</b>	<b>16,169</b>		<b>6,973</b>	<b>213</b>	<b>2,236</b>	<b>1,871</b>	<b>3,977</b>	<b>664</b>	<b>353</b>

**Table 11. Sockeye Catch in District 115 by sub-district. (ADF&G) Tag Lab Online Reports****Gillnet Sockeye Catch in District 115, Boat Harbor SHA is 115-11**

Year	15C		15B	15A				Total	% Boat Harbor SHA
	11510	11511	11520	11531	11532	11533	11534		
1976	3,894			47,307	19,238		54,983	125,422	
1977	769			31,373	2,929	2,924	122,425	160,420	
1978	2,989			33,924	68,249		3,318	108,480	
1979	282			121,115	46,517		25,060	192,974	
1980	853			41,203	4,132	2,047	5,752	53,987	
1981	10,168		1,289	65,802	866		15,122	93,247	
1982	5,432		160	121,689	15,488	26,433	104,631	273,833	
1983	19,856		90	173,253	20,211	38,566	117,862	369,838	
1984	10,538		3,759	162,164	15,069	28,017	115,035	334,582	
1985	61,533		7,736	82,680	28,711	27,636	65,069	273,365	
1986	40,541		1,100	158,958	30,541	18,611	40,154	289,905	
1987	32,236		1,244	151,510	173	36,427	193,746	415,336	
1988	7,000		17,496	162,219	925	30,601	133,558	351,799	
1989	110,959		9,249	189,381	39,842	34,016	88,467	471,914	
1990	104,928		3,612	136,541	45,584	3,250	63,503	357,418	
1991	33,051			97,506		39,956	138,218	308,731	
1992	55,806			160,043		6,370	63,816	286,035	
1993	53,359			88,003	10,964		20,787	173,113	
1994	60,588		80	80,315	22,973		7,773	171,729	
1995	26,899	7,556	505	41,570	12,146			88,676	8.5%
1996	37,625	3,346		65,031	42,265		1,311	149,578	2.2%
1997	35,332	7,561		52,669	22,703		563	118,828	6.4%
1998	9,308	11,162		66,614	47,853			134,937	8.3%
1999	10,659	6,969		80,998	64,934			163,560	4.3%
2000	19,583	13,313		47,909	28,755			109,560	12.2%
2001	67,893	22,863		33,079	12,603	209	11,164	147,811	15.5%
2002	32,339	7,992	6	28,574	8,672		4,431	82,014	9.7%
2003	33,750	3,944	74	18,075	17,053	2,509	19,725	95,130	4.1%
2004	69,387	7,784	130	39,347	16,941	716	16,940	151,245	5.1%
2005	24,227	2,993		14,461	3,701	3,729	16,358	65,469	4.6%
2006	26,402	4,878	96	11,464	476	19,677	82,586	145,579	3.4%
2007	36,027	12,526		16,827	89	10,523	80,944	156,936	8.0%
2008	21,704	12,120		10,994	475	86	1,276	46,655	26.0%
2009	37,137	12,255		39,478	37,565		159	126,594	9.7%
2010	30,710	11,646		31,997	19,298	285	7,037	100,973	11.5%
2011	43,714	6,335		7,463	645	1,244	4,392	63,793	9.9%
2012	101,501	17,525		27,605	397	20,202	57,413	224,643	7.8%
2013	57,173	8,656	34	21,262	27,304		7,674	122,103	7.1%
2014	81,890	20,777		53,236	15,634	9,685	53,460	234,682	8.9%
2015	42,604	7,147		32,291	5,731	9,484	34,320	131,577	5.4%
2016	50,606	12,253		57,191	1,868	24,789	42,137	188,844	6.5%
2017	20,673	8,053		5,697	2,926	589	1,778	39,716	20.3%





**Proposal 159 – SEAS supports this proposal.**

SEAS polled its membership on this question and an overwhelming 85% of members were in favor of this proposal. Although there may be some challenges to implementing it, there are many passionate voices on both sides. SEAS will let individuals relay their personal observations and opinions, but will make some comments about implementation in Prince William Sound (PWS).

A similar proposal was originally adopted in 1993 and has been upheld many times over the years, most recently in 2011 and 2014; ADF&G staff has been opposed to allowing spotter activities during open periods in PWS in the past. The current regulation, **5 AAC 24.378. Use of aircraft unlawful** reads, **“During open commercial salmon fishing periods no person may use an aircraft to locate salmon for the commercial taking of those fish or to direct commercial fishing operations.”** There was overwhelming public and BOF opposition to the elimination of the regulation altogether in both 2011 and 2014. During the 2014 BOF deliberations, The Department of Public Safety leadership stated on the record that “... some of the confusion may be on the trooper end in the Department of Public Safety, which can certainly be addressed by upper management to clear that up.” SEAS will submit an RC with transcripts of public and Board deliberation concerning this issue for reference prior to the Sitka meeting.

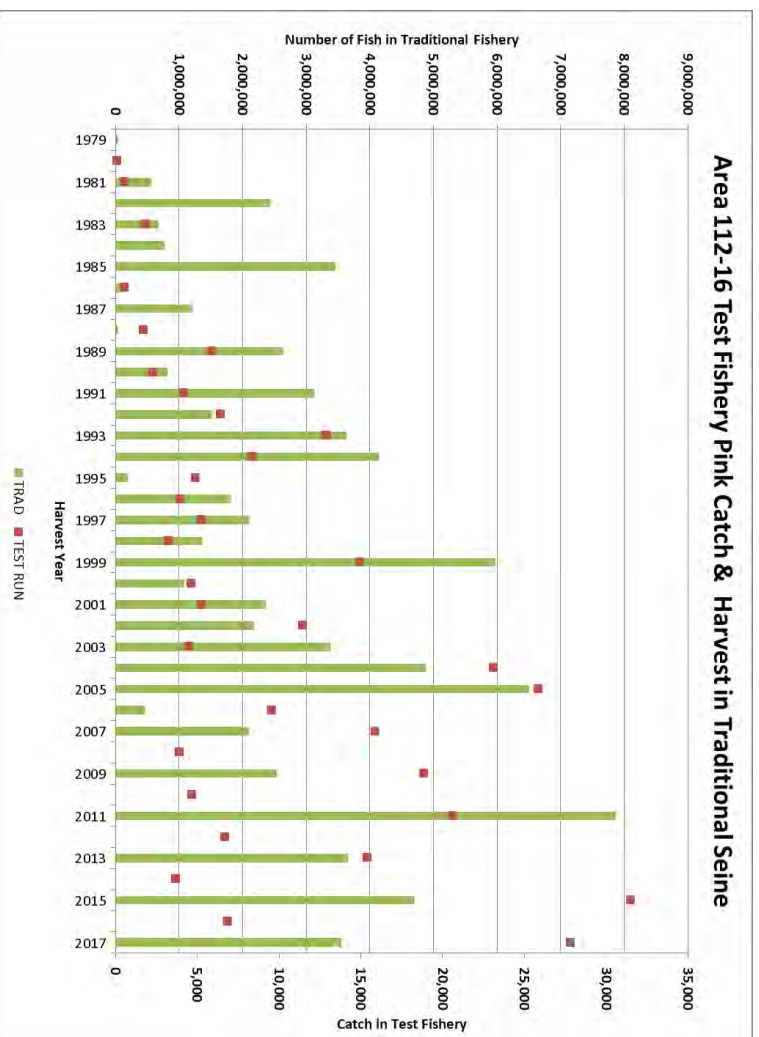
**Proposal 160 – SEAS defers to the Department’s and Fish and Wildlife Protection’s rationale on this proposal.**

**Proposal 166 – SEAS supports this proposal.**

The proponent of this proposal has been the contract seiner for the Hawk Inlet test fishery for more than ten years. We believe his knowledge of this area and how fish move, has led him to explore a more responsive management tool than how the Hawk Inlet data has been applied in recent years. This test fishery was established to assess early indications of pink salmon abundance and to allow the Department to have data to open this and surrounding areas to harvest north migrating pink salmon. A look of the data suggests that it was at one time used in this fashion, but there has been a departure in the last ten or so years (Table 12), (ADF&G) Tag Lab On-line Reports. This data shows the combined pink salmon catch in the test fishery over all weeks and the harvest of pinks in that statistical area on the same year. Starting in 2008, and every even year since, even when catches in the test fishery were at levels that merited a pink harvest of one to three million fish in previous years, there now has been no pink opportunity. SEAS understands that in any given year there may be other conservation concerns that are taken in consideration, and in 2008 that may have been a factor looking at the Lynn Canal sockeye catch and the US allowable harvest of Taku sockeye. For the other years however, the US allowable catch of Taku Sockeye was not even close to being achieved, and the Lynn Canal gillnet catch was also robust in those years (Table 11).



**Table 12. Hawk Inlet Test Fishery Catch of Pink Salmon & Traditional Seine Harvest in 112-16.**  
**Data from (ADF&G) Tag Lab On-line Reports**



SEAS position is that if this test fishery data is not going to be used in even years to allow for a potential harvest opportunity, another method for assessing abundance is required. The proponent of this proposal is looking for a tool that is useful to the Department, and SEAS would welcome working with the Department and the BOF to explore this and other options.

**Proposal 167 – SEAS opposes this proposal.**

The intent of this proposal is already being met with current management tools. There is a historically robust pink salmon fishery in Statistical Areas 114-27, 112-14, 112-16 and an occasional terminal pink fishery in 114-25. These fisheries pass all stocks to their respective terminal areas as illustrated by the consistent attainment of escapement in the systems the proposer mentions. The current management tools available to the department already adequately insure the passage of any non-pink species.

**Proposal 168 – SEAS opposes this proposal.**

Chinook run timing is well documented and demonstrates that almost the entire spawning population has passed through before the seine fleet is allowed time to fish in these areas. The Chinook simply aren't there when the seine fleet has access. One exception is the Pt. Augusta (114-12) pink index fishery, operating under Chinook non-retention.

**Proposal 169 – SEAS opposes this proposal.**

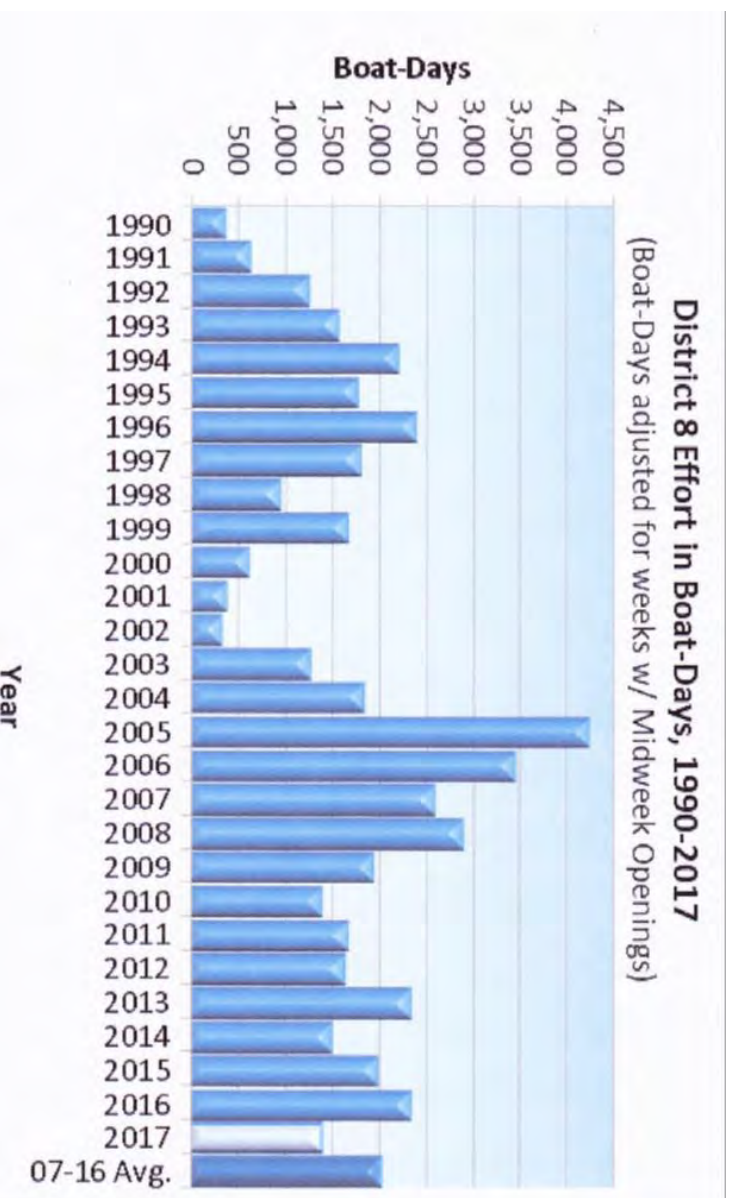
All gear groups share the burden of conservation measures when McDonald Lake Sockeye are a conservation concern. The Department has well documented migration and timing information it uses to close only specific time and areas, or employ net restrictions, to maximize escapement with as little effect on the harvest of other species in corridor fisheries as possible. Will the Troll and Seine fleet also be entitled additional access for their losses?

District 6 fishing effort was presented at the Seine and Gillnet Task Force Meeting in Ketchikan under “*District 6 and 8 Drift Gillnet Fisheries 2017 Postseason Report*”, given by Troy Thynes, ADF&G Area Management Biologist. It was presented as Figure 5 at the meeting, and is presented here as (Table 13). The total season effort for District 6 was 2263 boat-days, 82% of the 2007 – 2016 average. A similar and more dramatic drop in effort was shown in Figure 9, presented here as (Table 14) for District 8. The season effort in 2017 was 1,384 boat-days, well below the 2007 – 2016 average of 2,068 boat-days and 68% of the recent 10-year average. SEAS contends that the gillnet fleet has ample opportunity in many districts to access a variety of species on any given year or time frame; and they adjust their effort and location depending on which species is most abundant and valuable.

**Table 13. Historical Gillnet Effort in the District 6 Gillnet Fishery**



**Table 14. Historical Gillnet Effort in the District 8 Gillnet Fishery.**



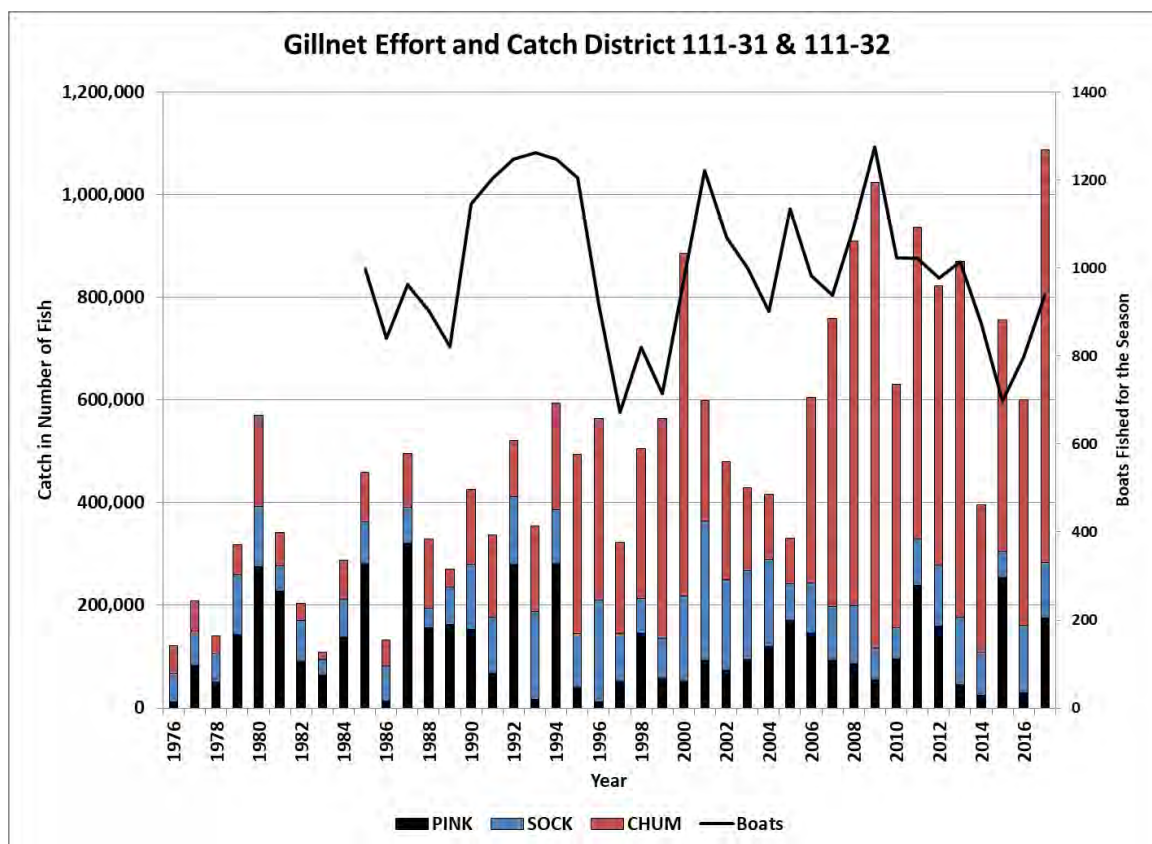
Not only is SEAS vehemently opposed to this proposal, in addition we would like to go on the record as being in favor of the sun-setting of **5AAC 33.359. Section 6-D Pink Salmon Management Plan.**

**Proposal 170 – SEAS opposes this proposal.**

This proposal is much like the District 6 and District 1 access proposals. The gillnet fleet has the same amount of area it has always had; the difference is that their behavior has changed and they choose to fish enhanced chum salmon. Fishing a more valuable specie in an area than historically was fished, does not equate to deserving an additional piece of the pie somewhere else. (Table 15) shows pink, sockeye, and chum catch in two sub-districts of District 111, just north of the area requested for additional opportunity. The number of boats fished for the season is also on the graph. We feel this data demonstrates well a significant increase in numbers of fish harvested, even in years of less effort.



**Table 15. Gillnet Harvest by Species and Cumulative Boats fishing for the Season.**  
(ADF&G) Provided Data and Downloads from Tag Data Base



**Proposal 174 and 176– SEAS supports these proposals.**

These new NSRAA release sites were intended to provide opportunity to the troll fleet to address their chronic inability to achieve their allocation of enhanced fish, and to help balance the net group's allocation percentages. Additional open area and management language changes that allow opportunity to explore means to appropriately deliver value are applauded.



SEAS Board, members, and executive director will be at the Sitka meeting. We would like to serve on the board committees formed to address these proposals, and welcome the opportunity to talk with board members about the fishery, these proposals, and answer any questions. Thank you for your time and commitment to the board process, and the personal sacrifice that entails. We appreciate the opportunity to comment that this process provides.

Sincerely,

*Susan Doherty*

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## SOUTHEAST HERRING CONSERVATION ALLIANCE



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Sitka, Alaska 99835  
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December 15, 2017

### **Board of Fisheries**

January 15 – 23, 2018  
Sitka, Alaska

Dear Chairman Jensen and Board of Fish Members:

The Southeast Herring Conservation Alliance (SHCA) submits these comments on proposals you will be considering at the upcoming meeting concerning fisheries in southeast Alaska. SHCA is a 501 (c)(6) not for profit and represents the interests of herring fishermen, processors, tender men, crew, and families associated with herring fisheries throughout southeast Alaska. SHCA members participate in the Sitka Sound herring sac roe fishery and other herring fisheries in Southeast. Forty-four sac roe permit holders of the 48 total permits are SHCA members. SHCA looks forward to working with the board this year on proposals pertaining to our fishery.

### **Support for Proposal 94 & 104 Opposition to Proposals 95, 96, 98, 99, 100, 105, & 106**

A general comment first: it has been reported at the board in past meetings that herring are important to the diet of Chinook salmon as a predator. A recent study by Ms Iris Kemp *Evaluating potential for resource competition between juvenile salmon and Pacific herring* demonstrates that adult herring have a major impact on juvenile Chinook as a prey item. A quote from the abstract “Because herring were much more abundant than salmon species, the population-level consumption by herring exceeded consumption by salmon, sometimes by orders of magnitude. If shared prey items are a limiting resource, there is considerable potential for herring to negatively affect salmon growth, particularly for Chinook salmon.” Saying herring are needed to support Chinook stocks is far too simplistic.

**Support Proposal 94** – Change ANS in Sitka Sound to reflect true harvest weights. Establish an accounting system for herring egg harvest in Sitka Sound through sampling program.

The fundamental reason for this proposal is the ANS range (136,000 to 227,000 lbs) for herring eggs in Sitka Sound is not based on scientifically defensible data or data that is



transparent. More to the point, the ANS guideline is being used by some, to claim the sac roe fishery is the reason ANS cannot be met. Based on SHCA's work in 2008 – 2014 collecting and delivering eggs in Sitka, this is simply not true. Our work outlined in previously submitted reports, show needs can be and were met, and as important, reasonable opportunity is extant. In order to document the harvest of herring eggs, and what quantity (by weight) meets those needs, a new methodology is required with greater scientific and statistical rigor than the current household survey methodology. SHCA understands that subsistence harvest throughout most of the State of Alaska does not require a permit or have "creel type censuses" to document harvest. However, Sitka Sound herring eggs and the sac roe fishery is a unique situation and demands a unique solution.

A study design that provides scientifically defensible data could be relatively simple. The herring egg harvest including tree preparation is done in a short period of two weeks in late March or early April. The eggs are primarily brought across one of six docks in Sitka – Starrigavan, Eliason, Thompson, ANB, Crescent, and Sealing Cove harbors. Based on experience in 2009 - 2014 the majority of herring eggs transit the Eliason dock due to its drivable ramp and work float but also the dock's central location in Sitka, as well as proximity to the core herring spawn areas to the north (i.e., Kasiana, Middle Islands).

In order to estimate harvest quantity, Subsistence Division samplers could observe/sample the docks for harvesters shortly after the first major spawn event. Harvesters could provide information to samplers or, less invasively, samplers could estimate weight of harvest, number of harvesters, and size of containers used to transport the harvest, and frequency. All docks should be surveyed although proportional sampling could be done much as the king salmon creel survey methodology. The majority of eggs cross the docks in a seven-day period, and therefore the duration of the survey can be short.

Estimating effort could consist of two elements: 1) interviewing harvester as they transit the docks as outlined above and 2) observations on the core subsistence areas for number of branch sets, size of branch sets, number of harvesters making sets, and size of harvest vessels. Success rate should be estimated by combining effort with harvest amounts, lost or stolen branch sets, and weight of eggs per set.

If the ANS were not being used as a reason to shut down or reduce harvest rates, or to expand the closed area, the ANS range would not be an issue. However, you will see that the ANS is mentioned as a reason for justifying several of the following proposals that do harm to the herring fishery.

#### **Support Proposal 104** – Eliminate the Sitka Sound closed area.

In late January 2015 the Federal Subsistence Board shutdown additional area adjacent to the Board of Fish closed area near Makhnati. This action was taken against the advice and recommendation of the Office of Subsistence Management staff biologists and against testimony by the State of Alaska.



Now that the feds have closed all federal waters around Makhnati for protection of subsistence and conservation the 2012 'Core Area' can be rescinded.

The reasons for establishing the Core Area closure was arbitrary and capricious and patently not necessary for successful subsistence herring egg collection. SHCA demonstrated success in 2009, 2010, and 2012 (three years without a Core Area closure) with herring egg harvests between 30,000 to 70,000 pounds. These harvests were made available to the community of Sitka. While the demand remained high for most of a week, after the sixth or seventh day the demand stopped. In all years we had more eggs than the number of people showing up to receive them. Excess eggs in each year were returned to the ocean.

***There is reasonable opportunity but not sufficient participation***

Supporting evidence can be found in conclusions in the Subsistence Division 2002-2010 Report No. 343 (Holen D., et.al. 2011), and the 2016 report, both of which in part state a significant reason being "participation in the subsistence harvest has declined in recent years". In fact, the 2016 report states ANS was met in 2014 and was close in other years. In 1985 Gelmech and Gelmech published a report stating that herring egg subsistence in Sitka Sound is practiced by a small proportion of the community. Twenty-five years later as stated in the Subsistence Division Report No. 343, that small number of harvesters has declined further. Five well-known "high harvesters" in the 80's, 90's & 00's, were fishermen (sac roe & salmon) and harvested herring eggs for Sitka and outlying communities have either retired or died. The reports' graph and table on page 24 and 25, respectively, tell the story of the decline in participation. The report also speaks to the desire to receive herring eggs, which has remained nearly constant.

The real question, then, is whether expansion of the core area or any part of the core area is necessary to provide a "reasonable opportunity" for subsistence, as defined in AS 16.05.258(f). That term is defined as "...allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant a reasonable expectation of success..." Reasonable opportunity is available every year. Based on ADG&G survey transects, heavy spawn densities have been documented at locations along the road side and/or within several miles of the Sitka road system in all years of the past decade (see attached maps). According to the Subsistence Report No. 343 the ANS guideline has been met six of the nine years documented in the report. In 2005, 2007, & 2008 when the lower ANS guideline was not reached it was not due to lack of reasonable opportunity, but rather reduced effort & participation, weather, and/or fuel costs, not to mention the reported numbers are not transparent. Spawn distribution does have a role in success, as the herring do not spawn with the same intensity at all given locations every year. Additionally, Report No. 343 calls into question their reported numbers by acknowledging the methodology was changed in 2010. The report does not discuss what the overhaul in methodology means to previous subsistence harvest estimates. The change certainly begs validation of, or qualification of previous results. Much additional work needs to be done to develop a scientifically defensible and transparent methodology.

***The ANS range is set artificially high and does not reflect verified weights and measure***

SHCA's work in 2009, 2010, 2012 - 2017 demonstrates there is reasonable opportunity for subsistence harvest of herring in Sitka Sound. Determining the total weight of herring eggs (actual



measured weights) required to meet needs is a different question, but based on our work it appears to be closer to 50,000 lbs for Sitka (see attached Herring Eggs on Branches Program 2009).

In the past decade before the Core Area was closed, the department has made a serious effort to stay out of the core area when possible; it has not always been possible. However, the vast majority of openings have been conducted outside the core area based on ADF&G reporting. From 2002 to 2012, approximately 80% of the sac roe harvest has been taken outside the 'Core Area' and of course since 2013 all harvest has occurred outside the closed Core Area. Regardless, the core area has had abundant spawn in all years. It is the one constant. In some years herring spawn in the Redoubt area or Deep Inlet but other years they do not; however, ADF&G spawn maps show consistent spawn in the core area year after year. Certainly, there is variability in the spawn density but Kasiana, Middle, Crow, and a portion of the roadside consistently have annual spawn.

Closing the Core Area was intended to diminish the fishery and the harvest. The proposers claim that subsistence needs cannot be met with the current sac roe fishery management plan. This is patently untrue and there is good evidence to demonstrate otherwise. In 2008 – 2010 and 2012 - 2017 the herring fishermen, processors, tender men, and community members got behind a program to help meet this need. SHCA's herring egg harvest is supplied to ADF&G Subsistence Division each year and used in their analysis of the egg harvest.

***If realizing ANS is used to curtail a fishery then that information needs to be transparent and verifiable***

If subsistence harvest information is used to curtail a fishery then that information needs to be transparent and verifiable, similar to commercial harvest data. There is no information to support that subsistence opportunity has been diminished in recent years. To the contrary, given increasing stock abundance and review of ADF&G spawn maps depicting spawn distribution, one can only conclude that subsistence opportunity is now greater than it has been since the department began managing the Sitka Sound herring stock in the 1970s when the biomass was ten percent of today's biomass.

The ability and desire to get out and collect the eggs may have declined for a variety of reasons, but there are groups and individuals ready to help with meeting that need. SHCA has demonstrated there is reasonable opportunity prior to the closing the 'Core Area'. It is reasonable and fair to eliminate the closure area and allow ADF&G to manage the fishery for the benefit of all, including subsistence harvest.

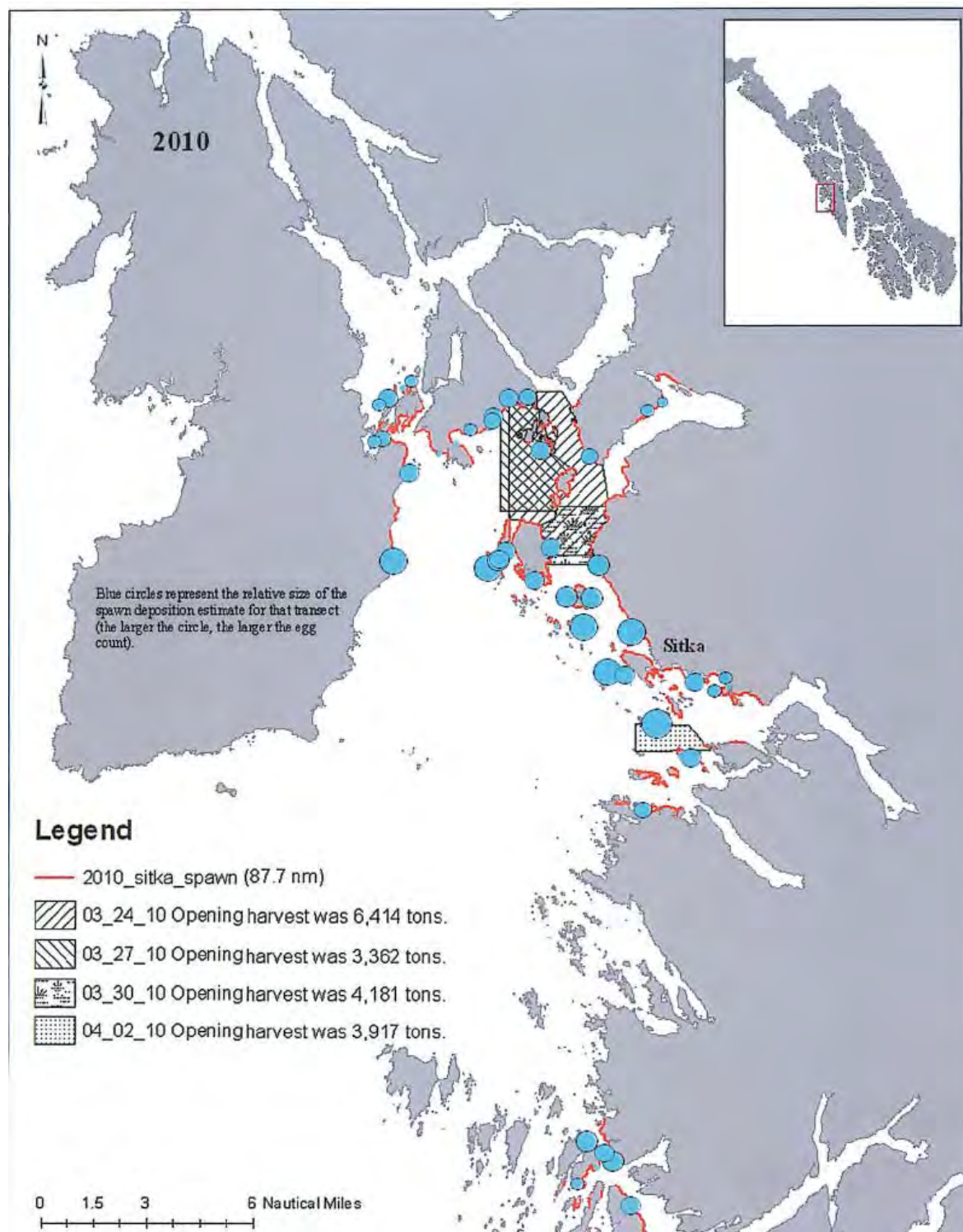


Figure 1. Typical Spawn Areas

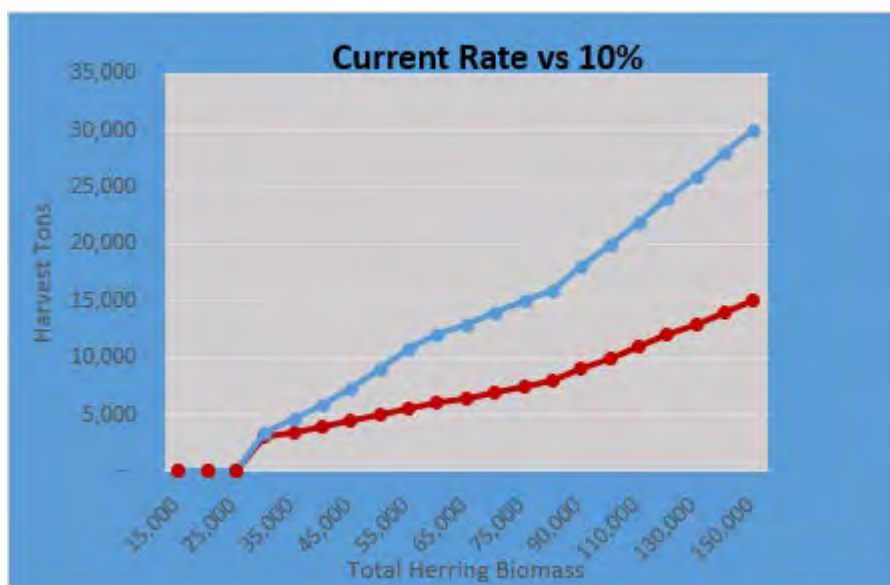


**Oppose Proposal 95 & 96** – Close herring fishing in 15-B & 15-C & 11-A

ADF&G has been managing these areas since statehood and has the necessary tools. The department will not open these areas unless the biomass surpasses the minimum thresholds established for these herring stocks. There is no need for BOF action on these proposals, as ADF&G closed the fisheries in the past due to decline in stocks and can do so in the future when the stocks rebound and perhaps decline again.

**Oppose Proposal 98** – Adjust harvest rate to 10%

There is no justification for changing the harvest formula. The formula is consistent with large biomasses of herring elsewhere in Alaska and coastal Canada from the Strait of Georgia to Prince Rupert, where herring is also increasing in biomass. Populations of herring with lower total biomass are managed with the “8+2” formula in Alaska for good reason; they are small populations, perhaps less resilient, and require a more conservative management regime. One size does not fit all, and should not. The “2+8” formula used by ADF&G in Sitka Sound is actually conservative for the large population size. In ten of the past eleven years the “2+8” formula resulted in a 20% harvest rate and yet during that same period of time the population has grown from an estimated 52,985 ton biomass to 145,042 tons and back down to the 50,000 ton range. In the past three years the biomass has turned down due to two weak three year old age classes (2012 and 2014). However, the 2013 age threes were strong and a review of the historical data shows the 3 year old component has had multiple years of strong, weak, and moderate recruitment.



*Figure 2. Cutting the harvest rate to 10%, cuts the value and harvest in half for recent biomass*

The conservation and protection built into the formula is in the harvest threshold side of the equation. Currently no harvest can occur in the Sitka Sound sac roe fishery until the biomass reaches 25,000 tons (adopted by Board of Fish in 2009); as the biomass rises above 25,000 tons the formula provides for a harvest rate that begins at 10% and rises to a 20% harvest rate maximum. Most herring



stocks in southeast Alaska are considerably smaller than the minimum threshold of the Sitka Sound stock. The minimum threshold enabling a fishery has increased for the Sitka stock from 6,000 tons in 1977 to 7,500 tons in 1983 and then was raised to 20,000 in 1997 as the biomass continued to increase. This was viewed as a conservation action even though there was not a biological need or a recommendation made for either the 20k or 25k ton threshold by ADF&G. By way of compromise to minimize loss of commercial harvest, the board adopted the “2+8” formula at the 1997 meeting. In 2009 the Board of Fish again increased the minimum threshold, this time to 25,000 tons for added conservation at lower stock levels, though there was no conservation need demonstrated or supported by ADF&G. This was done at a time when the herring expanded to nearly 90,000 tons in stock biomass.

There is no biological basis for changing the formula, it is simply allocative. ADF&G has been meticulous in seeking outside consultants and experts to review its ASA model, including UA professor Ted Cooney and a recent P.hD candidate at UW. In fact, in 2011 Canada’s Department of Fisheries and Oceans invited ADF&G to participate in a two day workshop with DFO modelers and biologists to meet with modeling experts from the University of Washington (Dr. Andre Punt) and University of British Columbia (Dr. Steve Martell) in Nanaimo, B.C. (per. comm. Dr. Sherri Dressel). The scope of the workshop included model functions, inputs, outputs, mortality factors, precautionary approach, and many esoteric modeling factors. The Canadian herring model was reviewed and frequent questions were asked of the Alaska team to bore into model criteria. Based on the review it is apparent the department is doing its due diligence to keep abreast of the latest modeling recommendations and science. (No publicly available document produced by ADF&G)

This proposal seeks to harm the fishery, which in turn would harm anyone associated with the fishery – the communities of Sitka, Petersburg, Craig, Kake, Craig, Hydaburg, and Ketchikan; crew, tender men, processors and associated service providers. In fact, it would hurt STA members as many are fishermen and crew (6%). In a survey conducted in 2009 it was found 74% of the permit holders were Alaskan, 18% permit holders were Alaska Native, and 29% Alaska Native when including spouse, family & permit holder.

**Oppose Proposal 99** – Reduce current harvest rate from the formula  $[2 + 8(\text{spawning biomass in tons}/25,000)]$  to a maximum harvest rate of 10% or a maximum harvest of 10,000 tons or change to  $8+2(\text{spawning biomass in tons}/25,000)$ . See comments above for opposition to Proposal 98.

ADF&G is managing the Sitka Sound herring fishery with the most sophisticated model and annual biological parameters of any fishery in Alaska. This proposal is not about good science or stock health, but rather curtailing the herring fishery itself, plain and simple. This proposal will do harm to herring fishermen, processors, and the economy of the communities of Sitka, Juneau, Petersburg and Ketchikan. It will not increase the herring egg subsistence take because as the ADF&G Subsistence report makes clear, participation decline is the fundamental reason for fewer eggs being harvested. The spawn deposition far exceeds 8 million pounds of eggs. One hundred thousand pounds of eggs on branches is miniscule by comparison, however the effort to harvest a hundred thousand pounds eggs on branches is extremely arduous.



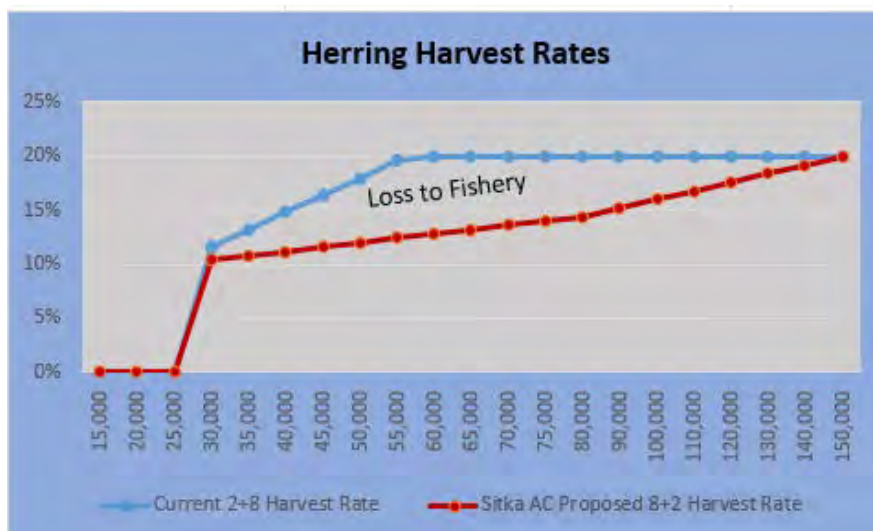


Figure 3. Modifying the harvest rate from the '2+8' to a '8+2' would create a significant impact



Figure 4. Potential first wholesale dollar loss to the herring fishery at different biomasses results in significant harm

There is no justification for changing the harvest formula. The formula is consistent with large biomasses of herring elsewhere in Alaska and coastal Canada from the Strait of Georgia to Prince Rupert, where herring is also increasing in biomass. Populations of herring with lower total biomass are managed with the "8+2" formula in Alaska for good reason; they are small populations, perhaps less resilient, and require a more conservative management regime. One size does not fit all, and should not. The "2+8" formula used by ADF&G in Sitka Sound is actually conservative for the large population size. In ten of the past eleven years the "2+8" formula resulted in a 20% harvest rate and yet during that same period of time the population has grown from an estimated 52,985 ton biomass to 145,042 tons and back down to



the 50,000 ton range. In the past three years, the biomass has turned down due to two weak three year old age classes (2012 and 2014). However, the 2013 age threes were strong and a review of the historical data shows the 3 year old component has had multiple years of strong, weak, and moderate recruitment.

The conservation and protection built into the formula is in the harvest threshold side of the equation. Currently no harvest can occur in the Sitka Sound sac roe fishery until the biomass reaches 25,000 tons (adopted by Board of Fish in 2009); as the biomass rises above 25,000 tons the formula provides for a harvest rate that begins at 10% and rises to a 20% harvest rate maximum. Most herring stocks in southeast Alaska are considerably smaller than the minimum threshold of the Sitka Sound stock. The minimum threshold enabling a fishery has increased for the Sitka stock from 6,000 tons in 1977 to 7,500 tons in 1983 and then was raised to 20,000 in 1997 as the biomass continued to increase. This was viewed as a conservation action even though there was not a biological need or a recommendation made for either the 20k or 25k ton threshold by ADF&G. By way of compromise to minimize loss of commercial harvest, the board adopted the “2+8” formula at the 1997 meeting. In 2009 the Board of Fish again increased the minimum threshold, this time to 25,000 tons for added conservation at lower stock levels, though there was no conservation need demonstrated or supported by ADF&G. This was done at a time when the herring expanded to nearly 90,000 tons in stock biomass.

There is no biological basis for changing the formula. ADF&G has been meticulous in seeking outside consultants and experts to review its ASA model, including UA professor Ted Cooney and a recent P.hD candidate at UW. In fact, in 2011 Canada’s Department of Fisheries and Oceans invited ADF&G to participate in a two day workshop with DFO modelers and biologists to meet with modeling experts from the University of Washington (Dr. Andre Punt) and University of British Columbia (Dr. Steve Martell) in Nanaimo, B.C. (per. comm. Dr. Sherri Dressel). The scope of the workshop included model functions, inputs, outputs, mortality factors, precautionary approach, and many esoteric modeling factors. The Canadian herring model was reviewed and frequent questions were asked of the Alaska team to bore into model criteria. Based on this review it is apparent the department is doing its due diligence to keep abreast of the latest modeling recommendations and science. (No publicly available document produced by ADF&G)

This proposal seeks to harm the fishery, which in turn would harm anyone associated with the fishery – the communities of Sitka, Petersburg, Craig, Kake, Craig, Hydaburg, and Ketchikan; crew, tender men, processors and associated service providers. In fact it would hurt STA members as many are fishermen and crew (6%). In a survey conducted in 2009 it was found 74% of the permit holders were Alaskan, 18% permit holders were Alaska Native, and 29% Alaska Native when including spouse, family & permit holder.



## **Oppose Proposal 105 & 106 – Expand closed waters**

In late January 2015 the Federal Subsistence Board shutdown additional area adjacent to the Board of Fish closed area near Makhnati. This action was taken against the advice and recommendation of the Office of Subsistence Management staff biologists and against testimony by the State of Alaska.

An approximately 10 square mile area was closed to fishing at the 2012 board of fish meeting. This was a political decision not a conservation decision. The proposer's contention is twofold: 1) sac roe harvests near or in the core area negatively affect subsistence egg on hemlock branch harvest, and 2) removing the core area from the fishery management unit will assure ANS. Both contentions lack supporting evidence and are contrary to conclusions in the Subsistence Division 2002-2010 Report No. 343 (Holen D., et.al. 2011), and the 2014 report soon to come out, both of which in part states that the more significant reason as being "participation in the subsistence harvest has declined in recent years". In fact, the 2014 report states ANS was met in 2014. In 1985 Gelmech and Gelmech published a report stating that herring egg subsistence in Sitka Sound is practiced by a small proportion of the community. Twenty-five years later as stated in the Subsistence Division Report No. 343, that small number of harvesters has declined further. Five well known "high harvesters", who were fishermen (sac roe & salmon) and harvested herring eggs for Sitka and outlying communities have either retired or died. The reports' graph and table on page 24 and 25, respectively, tell the story of the decline in participation. The report also speaks to the desire to receive herring eggs which has remained nearly constant.

The real question, then, is whether expansion of the core area or any part of the core area is necessary to provide a "reasonable opportunity" for subsistence, as defined in AS 16.05.258(f). That term is defined as "...allows a subsistence user to participate in a subsistence hunt or fishery that provides a normally diligent participant a reasonable expectation of success...." Reasonable opportunity is available every year. Based on ADG&G survey transects heavy spawn densities have been documented at locations along the road side and/or within several miles of the Sitka road system in all years of the past decade (see attached ADF&G spawn maps or raw survey data). According to the Subsistence Report No. 343 the ANS guideline has been met six of the nine years documented in the report. In 2005, 2007, & 2008 when the lower ANS guideline was not reached it was not due to lack of reasonable opportunity, but rather reduced effort & participation, weather, and/or fuel costs, not to mention the reported numbers are not transparent. Spawn distribution does have a role in success, as the herring do not spawn with the same intensity at all given locations every year. Additionally, Report No. 343 calls into question their reported numbers by acknowledging the methodology was changed in 2010. The report does not discuss what the overhaul in methodology means to previous subsistence harvest estimates. The change certainly begs validation of, or qualification of previous results. Much additional work needs to be done to develop a scientifically defensible and transparent methodology.

SHCA's work in 2009, 2010, 2012, 2013, & 2014 demonstrates there is reasonable opportunity for subsistence harvest of herring in Sitka Sound. Determining the total weight of herring eggs (actual



measured weights) required to meet needs is a different question, but based on our work it appears to be closer to 50,000 lbs for Sitka (see attached Herring Eggs on Branches Program 2009).

In the past decade, the department has made a serious effort to stay out of the core area when possible; it has not always been possible. However, the vast majority of openings have been conducted outside the core area based on ADF&G reporting. From 2002 to 2012, approximately 80% of the sac roe harvest has been taken outside the ‘Core Area’ and of course since 2013 all harvest has occurred outside the closed Core Area. Regardless, the core area has had abundant spawn in all years. It is the one constant. In some years herring spawn in the Redoubt area or Deep Inlet but other years they do not; however, ADF&G spawn maps show consistent spawn in the core area every year and year after year. Certainly there is variability in the spawn density but Kasiana, Middle, Crow, and a portion of the roadside consistently have annual spawn.

This proposal is intended to diminish the fishery and the harvest. The proposers claim that subsistence needs cannot be met with the current sac roe fishery management plan. This is patently untrue and there is good evidence to demonstrate otherwise. In 2008 – 2010 and 2012 - 2014 the herring fishermen, processors, tender men, and community members got behind a program to help meet this need. SHCA’s herring egg harvest is supplied to ADF&G Subsistence Division each year and used in their analysis of the egg harvest.

If subsistence harvest information is used to curtail a fishery then that information needs to be transparent and verifiable, similar to commercial harvest data. There is no information to support that subsistence opportunity has been diminished in recent years. To the contrary, given increasing stock abundance and review of ADF&G spawn maps depicting spawn distribution, one can only conclude that subsistence opportunity is now greater than it has been since the department began managing the Sitka Sound herring stock in the 1970s.

The ability and desire to get out and collect the eggs may have declined for a variety of reasons, but there are groups and individuals ready to help with meeting that desire. SHCA data and reports have demonstrated there is reasonable opportunity.

This proposal was voted down at Sitka ADF&G Advisory Committee meeting.

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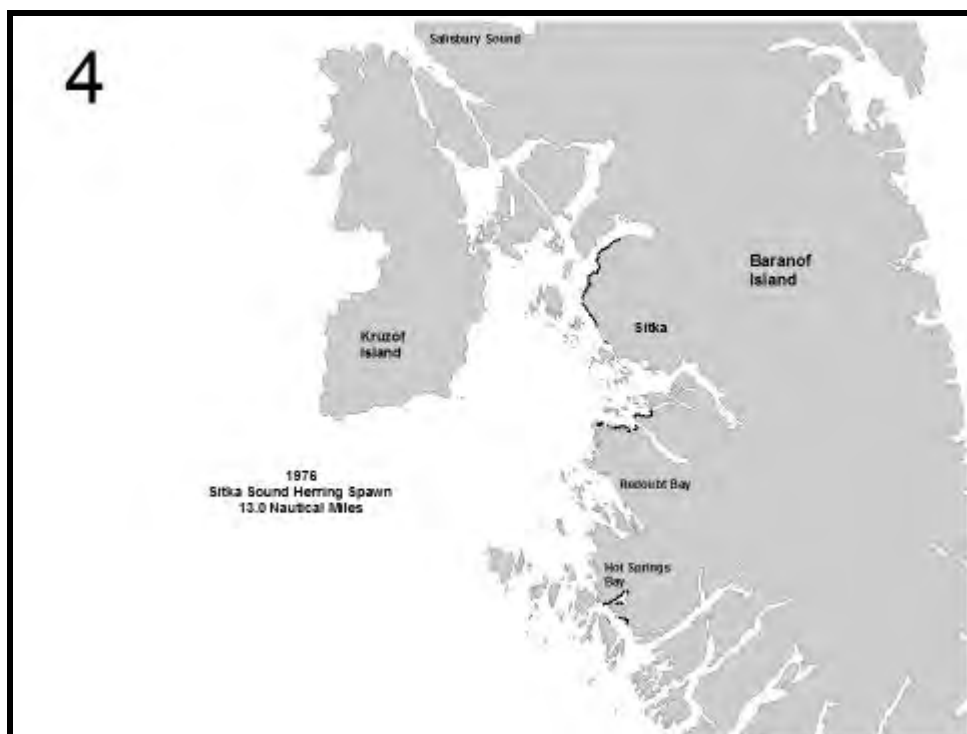
SHCA members and associate members will be at the Sitka meeting; we would welcome the opportunity to talk with board members about the fishery, these proposals and to answer any questions. We would also like to serve on the board committee formed to address these proposals.

Thank you for your time and commitment to the board process and the opportunity to comment.

Sincerely,



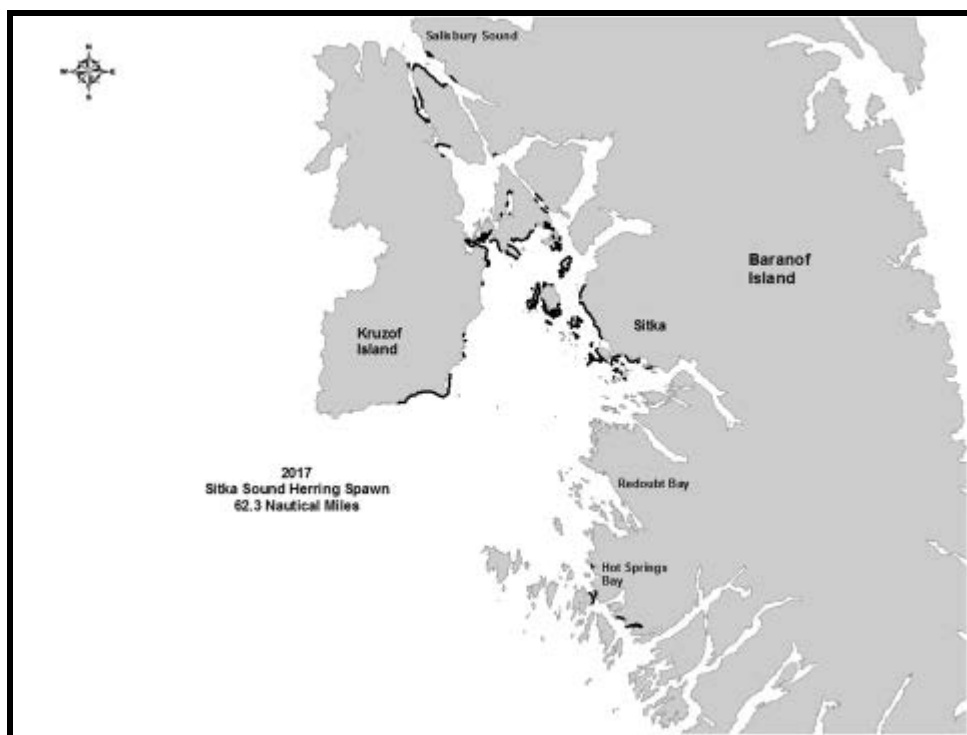
Steve Reifensstuhl  
Executive Director SHCA



*Figure 5. Typical spawn miles (13 nautical miles) in the 1970s*



*Figure 6. Typical spawn miles(58.1 nm) in 1990s*



*Figure 7. Spawn miles (62.3 nm) in 2017*



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***Public Comment to the Alaska Board of Fisheries Regarding Southeast and Yakutat Finfish and Shellfish Proposal 148***

***December 26, 2017***

***David Landis, General Manager  
Southern Southeast Regional Aquaculture Association  
14 Borch Street  
Ketchikan AK 99901  
(907) 225-9605***

Chairman Jensen and members of the Board of Fisheries:

I am testifying on behalf of Southern Southeast Regional Aquaculture Association ("SSRAA") and myself in opposition to Proposal 148.

I am a longtime resident of Ketchikan and the General Manager of SSRAA. I have been involved in local, regional and statewide issues for much of my career.

This testimony is written in opposition to Proposal 148, with specific authorization from the 21-member SSRAA Board of Directors.

The specific reasons for opposing Proposal 148 are fourfold: Comparative harvest of hatchery chinook by the sport/charter fleets is increasing; the proposed expanded area targets hatchery fish outside the scope of the Herring Bay THA Management Plan; the proposed expanded area will allow interception of impacted wild stocks; and enforcement of limits in the expanded area will be problematic.

***1. Comparative harvest of hatchery chinook by the sport/charter fleets is increasing.***

SSRAA is a regional, community-based organization with a mission to enhance and rehabilitate salmon production in the region to the optimum social and economic benefit of the user groups.

Although SSRAA and all its salmon production is fully funded by the commercial salmon fishing industry, there are designated directors on the SSRAA Board from municipal government, chambers of commerce, fish processors, native corporations, subsistence users, sport fishing interests and from the public at-large. The region is well-represented in all the communities.

The concept of common property use of SSRAA-produced salmon is well understood and accepted by the organization. However, where the common



property use of these fish diverges from a highly focused fishery is exemplified by what is being asked of the Board in Proposal 148: The sport/charter fleet, who have no obligation to fund hatchery chinook production, are seeking to more effectively target these fish while the commercial salmon fishers, who pay an enhancement tax and forego fishing opportunity due to recent conservative management, have had extensive and costly closures and remain tied up in the harbors. The proposed area expansion will exacerbate what was observed in spring/summer 2017, when sport fishing for chinook in this area continued uninterrupted while commercial trollers were tied to the dock during the spring chinook hatchery access period. Anecdotal accounts of sport/charter fishermen cheering the lack of competition from commercial trollers during the Ketchikan King Salmon Derby are examples of the backwards nature of this user-pays system. Expanding the area available for the sport/charter fleet as Proposal 148 seeks to do, will only serve to make these bitter pills even more painful for the commercial fleet who solely bear the enhancement burden.

Further, it should be noted by the Board that the chinook which do escape the gauntlet of sport/charter as well as commercial hooks and nets on their way back to Whitman Lake Hatchery are not excess to the needs of SSRAA. The continued production of the Chickamin stock of SSRAA chinook - currently released at Neets Bay, Carroll Inlet, Ketchikan Creek and Port St. Nicholas - is dependent on recruitment of broodstock adults back to the Whitman Lake Hatchery. An increased harvest could jeopardize release goals for those programs. The few chinook excess to brood are used for cost recovery – there are no fish wasted.

## ***2. The proposed expanded area targets hatchery fish outside the scope of the Herring Bay THA Management Plan.***

The section of Alaska Administrative Code that Proposal 148 seeks to modify is 5 AAC 33.369 – *The District 1 Herring Bay Terminal Harvest Area Salmon Management Plan*. The Plan starts out by stating “...*The management plan in this section allows for a harvest of Whitman Lake hatchery-produced king salmon by the troll, personal use, and sport fisheries.*” (emphasis added).

The sport/charter THA originally identified in this section is indeed effective in targeting Whitman Lake hatchery chinook. The corridors inside Carroll and George Inlets, Tongass Narrows and Nichols Passage near the inside Gravina Island shore are all areas that have proven abundance of Whitman Lake hatchery chinook. However, the outside Gravina Island shoreline in District 101-29, which is essentially the area that Proposal 148 seeks to open, is a corridor for a stock of fish that is not identified in the Herring Bay THA Management Plan – primarily the Neets Bay, and to some extent, Anita Bay stocks.



District 101-29, the outside shore of Gravina Island, is a well-known historical commercial troll drag, with a high abundance of Neets Bay/Anita Bay chinook. SSRAA tag recoveries bear out that fact, with an average of almost 50% Neets or Anita origin, and a high of 75% in 2015. As it happens, a testament to the high abundance of Neets Bay chinook in 101-29 is contained in Proposal 172 that the Board will be considering this very meeting.

Since Proposal 148 expands the sport/charter harvest area so far out into these adjacent migratory corridors, there are some serious consequences for stocks other than the Whitman Lake chinook that are the subject of this Board of Fisheries-approved Management Plan.

***3. The proposed expanded area will allow interception of impacted wild stocks.***

Much like the previous points with regard to an expanded sport/charter area impacting stocks other than Whitman Lake Hatchery's, Proposal 148 would generate substantial additional effort in the corridors used by migrating wild stocks, particularly those originating in the mainland and TBR streams. To make matters worse, the single greatest impact may very well be to Unuk River stocks, which the Board will be considering for *Stock of Concern* status during this meeting cycle.

The SSRAA Board and staff are well-versed after having worked through Unuk escapement issues in Behm Canal outside of Neets Bay for the past several years. During the early part of the season, time and area restrictions have been imposed upon the commercial fishermen in the Behm, even extending into Neets Bay during June to go the extra measure towards protecting Unuk stocks. To have an expanded sport/charter fishery such as that in Proposal 148 along these very same corridors is huge step in the wrong direction.

***4. Enforcement of limits in the expanded area will be problematic.***

The expanded area in Proposal 148 is far afield from the original area's well-traveled waterways of Mountain Point, Tongass Narrows and Nichols Passage. There are fewer boats, fewer houses, fewer people to observe who is doing what on the back side of Gravina, and all of Prince of Wales Island is right across Clarence Strait from the expanded area.

The result of this geographic separation from habitation and the "beaten path" could very well lead to difficulties in accurately and legally determining where a sport/charter boat is (or has been) fishing. The relatively compact original footprint of this area is geographically distinct and would be much simpler to accurately enforce as to area fished and chinook limits within those areas.



Finally, with regard bag limits: to effectively liberalize nonresident sport/charter chinook catches while restricting a largely resident commercial fleet is not good policymaking for the State, and in fact is contrary to best practices governance.

### **Summary**

To sum up these comments, please allow me to say that SSRAA harbors no ill will towards any user group, including the sport/charter industry or their proposals. To the contrary, we value the input and constituency of this industry segment in the SSRAA organization. It remains true, however, that unequally distributing highly focused fisheries to those who have no monetary stake in the resource is categorically unfair and imbalanced.

There are also equally good reasons, albeit with different circumstances, for rejecting this proposal based on biology and escapement or broodstock goals.

Finally, we feel strongly that this THA should be properly and easily enforceable to effectively protect the resource.

Thank you for allowing me to make these comments in opposition to Proposal 148. If you should have any questions, I would be pleased to answer them.

Sincerely,

A handwritten signature in black ink, appearing to read 'DL' or similar initials, followed by a horizontal flourish.

David Landis  
General Manager  
SSRAA, Inc.



***Public Comment to the Alaska Board of Fisheries Regarding Southeast and Yakutat Finfish and Shellfish Proposal 151***

***December 26, 2017***

***David Landis, General Manager  
Southern Southeast Regional Aquaculture Association  
14 Borch Street  
Ketchikan AK 99901  
(907) 225-9605***

Chairman Jensen and members of the Board of Fisheries:

I am testifying on behalf of Southern Southeast Regional Aquaculture Association ("SSRAA") and myself in support of Proposal 151.

I am a longtime resident of Ketchikan and the General Manager of SSRAA. I have been involved in local, regional and statewide issues for much of my career.

This testimony is written in support of Proposal 151, with specific authorization from the 21-member SSRAA Board of Directors.

The reasons for Proposal 151 being put forward by the SSRAA Board have been detailed in our original submission. This Proposal is essentially an updated THA Management Plan from a former SSRAA release site which was discontinued and then resumed in 2016 with a release of brood year 2014 chinook. The previously-repealed Management Plan is very similar to what is being considered in Proposal 151.

The dates for Department management of the Carroll Inlet THA, in consultation with SSRAA, were carefully considered with input from the Ketchikan ADF&G office and gear groups. The ending date for THA opportunity, July 10, was specifically chosen to target hatchery chinook and exclude Carroll River wildstock summer chum. July 10 was also the ending date from the previous Management Plan.

The THA area was also reduced in size from the first proposals made during the SSRAA Board meetings leading up to acceptance of Proposal 151. The first discussions were for the THA to include the entire Inlet from Carroll River to California Head. In response to Department input and collaboration, an area less than 20% of this extent was finally chosen, from Carroll River to Nigelius Point. Nigelius Point was the boundary in the previous Management Plan as well.



Although the “new” Management Plan’s essential elements are similar to the previous one, there are changed circumstances due to important present-day management issues. Specifically, the downturn in Unuk River chinook escapement and potential for listing as a *Stock of Concern*. To explain, there have been multiple years of time and area restrictions placed on all gear groups targeting SSRAA-produced salmon as the Unuk escapement has declined, the most restrictive of which have been placed on returns utilizing the Neets Bay corridors.

Historically, SSRAA’s largest chinook releases have been at Neets Bay. The most direct course of action to respond to these restrictions is to relocate any possible releases of chinook from Neets Bay, which is precisely what the SSRAA Board decided to do at the December 2017 board meeting. As it happens, one of the release sites that has additional capacity is Carroll Inlet, and in 2018 the 400,000 chinook release was voted to be increased an additional 200,000 to the permitted amount of 600,000.

The SSRAA Board decision to increase in the Carroll River chinook release is a direct response to Unuk-related restrictions, and the united view of the SSRAA Board to actively avoid producing fish that the fleets cannot capitalize on. If there are places like Carroll Inlet that might offer a refuge from Unuk impacts, that’s where they will want to put chinook and minimize the Neets Bay release that enters into a management restricted corridor. If it’s choice between continuing to produce chinook without alternative release sites outside of Neets Bay or converting chinook production to coho, the decisions might very well come down to drastically reducing SSRAA chinook.

If you should have any questions, I would be pleased to answer them.

Sincerely,

A handwritten signature in black ink, appearing to read "David Landis", with a stylized flourish at the end.

David Landis  
General Manager  
SSRAA, Inc.



Submitted By  
Spike Arnold  
Submitted On  
12/27/2017 5:38:50 PM  
Affiliation  
AFA

Re, Fin Fish proposal 104, please don't be fooled by 104. The Local Core Area, 5AAC 27.150(a)(7), is where local people can set branches for collecting Herring eggs without interference with commercial seine boats. This is just a very small part of the Sitka Sound sac roe herring area. 'Southeast Herring Conservation Alliance' is a deceptive name. Proposal 104 is NOT for or about conservation. When commercial interests want to move into this core area, that is their admission there is a problem with the herring population.

Submitted By  
Spike Arnold  
Submitted On  
12/27/2017 4:53:48 PM  
Affiliation  
AFA

Re, Fin Fish proposals 99 & 98, I support both proposals, especially 99. If you listen to Sitka people you will hear their concerns with collecting Herring eggs on branches. Although theirs are admittedly very valid concerns they overlook the larger picture, the roll of Herring as the major food for our larger fish. Eggs on branches is the proverbial "Canary in the Coal Mine" that should alert you to this bigger problem.

Larger commercial & sport fish are in trouble. They're starving. Most fisher groups have been asked to help: Commercial, Sport, Charter, & Subsistence fishers have accepted greatly reduced harvest levels to protect the resource.

But for one group, of mostly lower 48 boats, it's been "Business As Usual". Sitka sac roe herring permit holders have still been given the same 20 percent allocation of the Herring biomass. That's Salmon & other Game Fishes' Food.





Submitted By  
STEPHEN h HOFFMAN  
Submitted On  
12/28/2017 9:21:47 AM  
Affiliation  
1950

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ketchikan, Alaska 99901

I have just finished reading the ADF&G Draft Unuk River King Salmon Stock Status and Action Plan, 2018 and I have the following comments.

1. I support Option C for the Ketchikan area sport fishery as the best option to increase king salmon escapements into this drainage in 2018 and beyond.
2. I also support ADF&G minimizing the number of days that the commercial troll fishery is opened in the Ketchikan area as this fishery has a major impact on escapements of king salmon into the Unuk River. Historical Coded Wire tag recovery data could be used for opening and closing of this fishery as well as areas to be opened.
3. I would also support the same approach for opening and closing of Ketchikan area commercial seine and gillnet fisheries that intercept Unuk River king salmon as detailed in #2 listed above.

In summary, The BOF should mandate that ADF&G manage the Ketchikan area sport and commercial fisheries very conservatively to ensure that Unuk River king salmon escapements rebound into the middle or upper end of escapement goals established for this river. This will provide for future years of harvest opportunity for both sport and commercial fisheries utilizing this resource.

Steve Hoffman



Submitted By  
Steve Gass  
Submitted On  
12/26/2017 1:29:02 PM  
Affiliation

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9546757896

Email  
[stevegass52@yahoo.com](mailto:stevegass52@yahoo.com)

Address  
lot 8 island view  
hollis, Alaska 99921

I would like to comment in favor proposal 84. My next door neighbor Thomas Harden has written an excellent letter which is before this board detailing precise reasoning which our community has set forth to justify this position. As a retired commercial fisherman it is with some reluctance that I come before this board seeking to remove resources from any commercial fishery however there is strong evidence to support the fact that the fishery is in decline in 12 Mile Arm to the point that subsistence fishermen find it difficult find adequate supplies of shrimp. While not directly related to proposal 84 I would also like to say personally anything which the board could do to restrict the taking of egg-bearing shrimp would have a great impact upon improving the numbers of shrimp in The Twelve Mile Arm and Kassaan Bay Areas.



Submitted By  
Steve Lambert  
Submitted On  
12/26/2017 8:42:39 AM  
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Anchorage, Alaska 99504

### **Comment on Tsiu Commercial Fishery**

As a sport fisherman who has fished the Tsiu river since 1992, I would like to comment on the proposed area available to the commercial fishery. The course of the Tsiu river changes annually depending on winter weather conditions. In the last few years we have seen the length of fishable river shrink dramatically. The fishable area on the river is currently much shorter than it has been in the last 25 years I have been fishing it. I feel that both sport and commercial fisheries should have equal access to the river and I would request that board keep at least half of the fishable area on the river open and available for sport fishing as part of any new regulations. I feel that as a minimum there should be 1/2 mile above the commercial nets available to sports fishermen. Thank you for the opportunity to comment and I look forward to your decision to protect what I feel is the best Coho salmon fishing river in the state of Alaska.



Submitted By  
Steve Merritt  
Submitted On  
12/18/2017 12:16:31 PM  
Affiliation  
Commercial troller

~~Proposal 134

My name is Steve Merritt and I am a commercial troller who resides in Craig, Alaska.

I OPPOSE proposal 134 as written.

This proposal is being followed to some extent by the department without it being regulation right now. Although the troll fishery is the greatest harvester of the Taku Chinook by CWT data, developing new genetic data on this subject may indicate differently concerning the troll spring fisheries.

That said, this proposal is suspiciously one sided. It only works one way. If the Juneau sport fishery is closed for conservation of the Taku Chinook then the spring troll fisheries close for the same period of time.

Yes, the thrust of this proposal indicates that it has the conservation of the Taku Chinook at its heart. So why is it not designed to work both ways?? What about the reverse when the troll spring fisheries are closed for conservation of the Taku Chinook, then the Juneau sport fishery will be closed also?

If this were truly a conservation proposal then it should work both ways, but it does not. To make this proposal more legitimate under the guise of conservation it needs to be amended to go both ways.

There is also a reallocation factor within this proposal the way it reads now. Closing both the commercial spring troll areas and the Juneau sport fishery for the identical time frame allows the Juneau sport fishery to harvest the very Taku kings that the troll fishery passed thru their fishery.

The spring fisheries located in the Southern portions of districts 9 and 12 are very far from the entrance of the Taku river; close to 100 miles. The fish that pass thru those spring troll fisheries won't reach the river mouth for some time. I suspect the Taku fish that arrive in these spring hatchery areas around June 1 won't be in the Juneau area for a week or two.

Under this proposal those fish that were passed thru the troll fishery on June 1 will most likely get to Juneau just in time for the reopening of the sport fishery on June 16.

If the intent of this proposal is truly to pass more spawners to the Taku river than the dates specified should align with getting the fish into the river from the outer districts to the finish. Not to have them clobbered at the front door of the river by the sport fishery .. As written, a major part of the Troller's sacrifice no longer is conservation but basic reallocation of the resource via this proposal. Or it could be the you can't fish when I can't fish syndrome.

It should be amended to read if the Juneau sport fishery is closed from May 1- June 15 then the troll spring fisheries for those districts be closed April 15 to June 1. ; Or possibly have the Juneau sport fishery closed from May 1- to July 1 and commercial troll closed from April 15 to June 15.

If the above amendments were to be made , it would be more likely to be accepted by the commercial troll fishery as a conservation proposal. Currently, it is mostly reallocation under the cloak of being a conservation proposal.

If you adopt this proposal I ask you to amend it accordingly.

Sincerely, Steve Merritt



Submitted By  
Steve Merritt  
Submitted On  
12/19/2017 10:27:33 PM  
Affiliation  
Commercial troller

~~Proposal 146

I OPPOSE proposal 146

My name is Steve Merritt and I am a commercial troller who resides in Craig, Alaska.

When trolling is considered this proposal would severely affect the current troll allocation percentage in a negative way. Trollers have almost always been below their allocation percentage outlined in the plan since it came to be. During that time and now the troll allocation percentage needs every scrap of enhanced fish to count toward that percentage be it private or not; especially in the light of severely restricted spring chinook fisheries.

DIPAC hatchery in Juneau is the reason for this proposal. DIPAC hatchery is a private non-profit and historically 3/4 of it's enhanced fish value has ended up in the gillnetter's pockets. (McDowell group 2009) This affects the gillnetters allocation percentage in a big way. The gillnet fleet has been about 13% over their designated allocation percentage for a long time; largely due to DIPAC hatchery fish. The proposer uses several other aspects of private hatchery management to try to convince you to remove all private hatcheries from the allocation picture, sighting board representation, fleet hatchery taxes and the history of Prince William Sound. But, the true and unmentioned goal of this proposal is to remove DIPAC's influence on the gillnet allocation percentage.

Rather than face rotational changes in THA's with the other fleets or give up other arenas of gillnet hatchery fishing to lower their overall allocation percentage, this proposer wants to use the removal of private hatchery impacts. This would result on paper, the gillnet fleet being closer to the enhancement plan's outlined percentages but in reality, they would be catching far more of the enhanced fish produced.

However, when the troll and seine fleets are concerned, removing the private hatchery production from the allocation picture would lower their current allocation percentages also. While the troll and seine fleets only share about 1/4 of the DIPAC's production, their allocation percentages are influenced by other private hatchery production as well. So, in the proposer's attempt to rid the gillnet fleet of DIPAC's influence, he has overlooked the impacts on the other fleets.

Before the Klawock hatchery was adopted by SSRAA, the troll fleet's allocation percentage was often affected by its production. A couple of its private years it contributed 8-10% of the troller's total annual allocation percentage; almost half of their total for the year.

A fact that the other commercial fleets competing for enhanced fish whole heartedly endorsed. If this proposal was in effect in those years, on paper, the troll fleet would have had even more means to revolt and attack the other fleets on allocation. As president of the Alaska Trollers Association, I personally am thankful that every enhanced fish be included in the allocation picture, for this very reason.

One of the main selling points in convincing SSRAA to take Klawock hatchery's operations over, was the fact that this private hatchery contributed significantly to the troll allocation. If this proposal had been in place that would not have been so.

The proposer sites that current system allows manipulation by one gear group or another based on incomplete data, yet removing the private hatchery's enhanced production from the allocation picture, makes... the data incomplete.

The enhancement taxes received by the regional hatchery associations does help I am sure, and since all fish caught wild, private and regional are taxed at 3%, a possible solution would be to distribute the enhancement tax to ALL hatchery operators. But removing the private hatcheries from the allocation picture is not the way to solve that issue and will create more problems than it ever solved if any. In closing, before you vote on this issue I urge you to look at past BOF votes on this very proposal. The United Southeast Alaska Gillnetters (USAG) has put this same proposal in in one version or another for several cycles. Last cycle (2012) proposals 323 and 324 were of this same line and both failed to pass. Your predecessor's findings may help you understand what is really going on.

Sincerely, Steve Merritt



Submitted By  
Steve Merritt  
Submitted On  
12/24/2017 11:05:07 AM  
Affiliation  
Commercial salmon troller

My name is Steve Merritt and I am a commercial troller who resides in Craig, Alaska.

This document contains my comments on the UNUK, CHILKAT and KING SALMON RIVER Chinook Action Plans submitted by the department in December 2017.

The options for the commercial troll fisheries in all the plans submitted are virtually the same and my comments below have that at the forefront.

The Chilkat and King Salmon River action plan have varying sport options. I won't comment on those but to only say that the Status Quo Option A probably needs to go by the way side and go to Option B. I recognize the sacrifices made by the Haines and Juneau sport fisheries already, and if the department can show data indicating adequate gains on the escapement due to those sacrifices, then Status Quo is acceptable. I think Option C is totally out of line.

I will comment on the Unuk sport and commercial fisheries plans.

There are some notable differences in data gathering between the sport and commercial fisheries that may seem insignificant to you yet in reality are very momentous.

The commercial troll fishery is port sampled well over 25%. The sport fishery on the other hand is sampled at lessor rate.

From public data on the state web site, Ketchikan had 29,000 salt water anglers fishing for king salmon in 2016. Of those 29,000 I doubt more than 3,000 were port sampled.

There are also several lodges that reside outside the city resulting in not being sampled at all.

When the sport fish harvest data of the Unuk fish is said to drop from 6% to 3% due to status quo conservation actions, it boils down to whether or not the creel sampling in town picked up one Unuk tag instead of two.

The Unuk sport fisheries Statu Quo plan is unacceptable to me. If you look at the areas where they have closed the sport fishery, you will find that they all allow the Unuk kings to be captured after being bottlenecked down into a less than a 2 mile wide stretch of water.

Both ends of the Behm canal narrow to less than 2 mile wide corridors. Drawing closure lines within these areas is similar to drawing a closure line across the middle of the Unuk river. If you were to protect the fish in a river you would not draw a line anywhere within or near, the river itself, yet that is basically what the department has done.

Currently, the sport fisherman are allowed to fish just below these lines, in these narrow corridors and pick off the bottlenecked Unuk kings. That type of protection, if you can call it that, is unacceptable and ineffective in passing thru Unuk spawners to the spawning grounds. Those lines need to be moved out significantly as the examples of Option B and C illustrate.

Options B or C are much more acceptable to me being that the only true measure of conservation within those options, is the relocation of those closure lines out from the bottlenecked areas.

The other measures within those options are superficial and misleading to Board of Fisheries Members.

The majority of the anglers that fish the area for king salmon May-August are non-residents. Tour ships are tied up in Ketchikan sometimes 4 at a time weekly. That is an influx of 15,000 people every week in Ketchikan; generating multiple fishing charters.

For an Abundance index of less than or equal to 1.2, the current sportfish management plan calls for One king a day and a 3 annual limit for non-residents.

If the AI is lower than 1.2 in 2018-2020 the bag and annual limits outlined in these plans will result in zero conservation of Unuk fish. In fact, the exact opposite will happen if the AI generated is 1.1 or lower. The trend from the last 4 years indicates that it is more than likely that the 2018 AI will be lower than 1.2.

Conservation plans are not business as usual plans, they are more restrictive. If an AI of 1.2 or lower, all 3 Unuk Options for the sport fishery, outlining area indicating bag limits of 1 king and annual limit of 3 kings, will actually be equal to or above bag and annual limits specified in the sportfish management plan for all of Southeast Alaska.

When considering these plans I recommend that you have the department give you their best guess as to what AI we are facing in the future. Adopting the Unuk sportfish plans they have presented in years with AI's of less than 1.2 could result in more Unuk fish harvested than if they had just implemented the current sportfish management plan.

What really needs to happen is these plan's restrictions need to be correlated to the AI generated each year. Right now the Unuk sport plans outlined will be conservative if we have an AI of 1.5 or higher but for AI's lower than that, more aggressive restrictions need to be developed.



In comparing Options B and C you can see that there is only a slight difference in the expansion of the Northern Behm canal closed area between the two. The shaded areas illustrating bag/annual limits are again superficial as far as conservation measures bearing any fruit. There are different lines for no fishing period or only after August 14 in Option C, but harvest wise of the Unuk, they mean the same thing. No harvest and no real change from Option B.

In my opinion as far as Option C is concerned, the Unuk sport plan is below the standard you see through out all the other Option C plans. Option C in other plans contain draconian measures for the fishery being evaluated compared to the other Options submitted. In the Unuk Option C sport plan there is only a slight change of closed area compared to Option B.

Expanding the closed area on the Northern end of Behm canal to a point where it closes part of the Gravina shore, would create a Unuk sport fish Option C plan, similar in magnitude to the other C plans.

If you think there is any realistic difference between Option B and C now, you are kidding yourself. Unless you do something to the non-resident annual limit in this area in addition to what is outlined, or expand the closed area in Option C, their conservation results will be identical.

As far as the commercial fishery Options are concerned. I can not see this Board of Fisheries going with status Quo for any of the fisheries after reading the preseason forecasts for the Unuk 2018 season. There has been a lot of inaccuracies in these forecasts as you well know, but given the situation I think you cannot consider inaccuracy in the Unuk's.

There is no doubt the troll fishery is the largest harvester of the Unuk king salmon and it is well documented by CWT. However new genetic data may shed light as to the actual proportional differences between the sport and commercial fisheries. These results most likely will show sport harvest of the Unuk is significantly more than is currently documented.

Option B for the commercial fisheries I believe is the most reasonable option to adopt.

Despite several conversations and meetings with ADF&G concerning the development of these plans, I am having trouble accepting parts of the plan.

In both Options B and C the department has suggested that you delay the summer troll fishery opening date. I have been informed that this aspect of the plan is not based totally on whether or not this will save any Unuk or Chilkat kings from harvest, but on the quest of the department to gather more harvest data from different periods of the year. Normally, I could see some merit to doing something like that when we are fishing as we historically have, but we are not. The data generated by this will not be comparable to the historic data recorded.

If the Option B were selected, the winter and spring fisheries of the troll fishery will be seriously different from past fishing seasons. To try and compare the results of delaying the July opening date under those conditions, to years where we fished the winter and spring normally, makes little sense.

There will be a build up of Alaska hatchery fish available to the summer fishery simply because they weren't harvested in the spring fisheries. This will dilute the typical summer fisheries wild to hatchery ratio compared to past years. This could influence the data and show there is less SEAK stocks harvested in the delayed opening.

Contrarily, there could be more Unuk, as well as other Alaskan stocks caught in the July opening because they also, were not caught in the spring and winter fisheries. The results mostly likely will show the inflation of the harvest of these fish in the summer fishery, not due to it per normal, but due to circumstances not normal.

That will only be useful in condemning the summer fishery based on data that is irregular. So, some consistency is needed here to at least to keep from jumping to conclusions that have been generate by altered fishery practices.

There is also the economic impacts of this delay for the sake of curiosity. Many of these trollers have large payments and the sooner the money starts flowing in, the better.

So I ask you to modify Option B and C to not include a delayed July summer king fishery for the above reasons.

The second issue I have with both Option B and C is the fact that the summer fisheries actions seem to conflict with the current data and past rationale of the Deputy Commissioner to close the second troll chinook opening in August of 2017.

In the rationale for closing that fishery it was highlighted, although not of spawner basis, that August troll chinook fisheries have a higher rate of Alaska stock interception than the July fishery.

I understand that the Department when creating this plan did not want to alter regulations already in place, such as the execution of the second chinook troll fishery in August. But, this is a conservation plan to save Unuk and Chilkat stocks and to leave 30% of the troll summer fishery quota to be harvested at a higher impact to those stocks, doesn't make a whole lot of sense.

Instead of harvesting 70% of the summer troll fisheries treaty quota in July, it would make more conservation sense to harvest 100% of the



summer troll quota in July. Therefore, I ask you to amend Options B and C to that affect.



If you are unwilling to do that I ask that you at least make as part of any plan you adopt, to include the procurement of the second chinook opening in August and its goal of harvesting the remaining 30% of the quota. It has already been closed by the commissioner in 2017 for conservation purposes of the very stocks these plans are addressing. To not include the August opening as part of that plan leaves that fishery out there for closure when you have adopted these other measures to address the problem. If you expect fishermen to get behind any of these plans, then a little security would not be amiss here.

There will be many different opinions voiced at the meeting about these plans. The troll fishery has already undergone serious economic hardship in the name of conservation of these fish. I have been commercial trolling for about 40 years and heavily involved in the Board of Fisheries process. I tried to approach this as conservation minded as possible and still have both sport and commercial fisheries in the end.

Sincerely, Steve Merritt



Submitted By  
Steve Merritt  
Submitted On  
12/18/2017 11:58:37 AM  
Affiliation  
Commercial troller

~~Proposal 133  
Board of Fisheries

My name is Steve Merritt and am a commercial troller residing in Craig, Alaska. I oppose this proposal for several reasons.

1. Proposal 133 bases the management of the commercial fisheries in district 9, 12 and 14 on the preseason forecasts of individual rivers within Southeast Alaska. This proposal does not take into account situations where preseason forecasts for individual rivers are different from one another.

The Taku and Stikine forecasts are similar in nature but their goal ranges differ.

The 2016 preseason forecast for these rivers generated on 12/4/15 predicted that the Stikine river would be over the harvest goal range yet the Taku, be within its escapement range goals.

By this proposal's defined requirements, the management of commercial fisheries in districts 9, 12 and 14 would specify different fishing times depending on which preseason forecast was adhered to. Which preseason should the department give credence to?

The Stikine, Taku and Chilkat Chinook all travel through districts 9, 12 and 14 with varying densities. How is the department to manage the commercial fisheries openings in these mixed stock areas, based on 3rds of the individual rivers forecast runs, when they are hardly ever identical? You can't manage these large districts so strictly on something that is so internally variable.

2. The Chilkat's escapement goal range is 1750-3500 large Chinook. The spring troll fishery's 10 year average harvest of Chilkat kings is 123 fish and the recent 5 year average is only 51 fish. This comes from Southeast Alaska Chinook Contributions data; provided to me by the department, September 2017.

Comparing this data to Chilkat escapement data in the study below. <http://www.adfg.alaska.gov/FedAidpdfs/ROP.SF.1J.2015.13.pdf>

The most updated data I could find (2007-2013) the average spring troll exploitation rate of the Chilkat is less than 4%.

To base the commercial fishing time of the spring troll fishery on the preseason forecast of this small system makes no rational sense. The spring troll harvest of these fish is truly insignificant in relation to the escapement of this system and stopping the spring fisheries in their entirety would not add to the escapement significantly.

Whatever the reduction in catch of these fish the proposer anticipates by further restricting the troll spring fisheries in these districts, will not be enough to make even the slightest difference.

3. Preseason forecast's accuracy has been undependable in the past. The 2014 preseason forecast of the Taku generated on 2/18/14 estimated the terminal run size of 26,800 kings, well within the escapement range of 19,000-36,000 Chinook. By 6/12/14 the terminal run estimate was reduced to 17,570 fish and BELOW goal.

4. Not only are preseason forecasts inaccurate but there have been circumstances where the dept. was not able to update them accordingly. Which in proposal 133's case, would result in continuing on with the current commercial fisheries management based on old and irrelevant information. On 6/11/15 the following was contained in a gillnet fishery announcement.

**A reliable in-season Stikine River Chinook salmon abundance estimate is not available due to poor river conditions affecting the mark and recapture assessment program. Therefore, the forecast is unchanged from the preseason forecast of 30,200 Chinook salmon.**

Given the inaccuracies of the preseason forecasts and the department not always being able to update it, proposal 133 could result in them being obligated by regulation to open commercial fisheries in these districts, when they shouldn't.

Sure, this proposal states that CPUE, sport fishery catch data, tag data and fish wheel data would be allowed to influence the department's management of these districts. Truth is, they have this ability currently and to specifically state that these commercial fisheries will be open this amount of time, based on this 1/3 of a preseason forecast, in regulation; opens the door to disputing any department decisions resulting in less time. In other words, the less said the better when considering non-allocative fisheries management. It will affect the department's decisions for fear of law suits. Set the goals and let the department do their job. Micro management is not the answer.

5. As you Board of Fisheries members well know, the department is responding to this current crisis by submitting a conservation plan at this meeting. Permanently changing the existing management plan for commercial fisheries under these circumstances is not the correct thing to do. This proposer holds the existing management strategy responsible for the current Chinook crises in our Southeastern rivers when it is well known that over fishing is not the issue. This is just a ploy to incur permanent economic hardship on commercial fisheries in the time of a conservation crises.

In closing, this proposal if adopted would result in poorer management practices by using unreliable forecasts as a basis. It will inflict

unwarranted permanent economic hardship on the commercial fisheries. If passed it could subject the department to ethical conflicts management criteria and potential legal disputes.



I ask you to please OPPOSE proposal 133. Sincerely, Steve Merritt



## Page 1 Fujioka Personal Comments

Alaska Dept of Fish and Game

Boards Support Section

PO Box 115526

Juneau, AK 99811-5526

December 28, 2017

Members of the Board of Fisheries:

I have been a commercial troller for the past eight seasons. I chose to become a professional hook-and-line fisherman after nearly three decades of sportfishing in northern Southeast Alaska – an activity I continue to enjoy. I have taken experience in several other commercial fisheries in the region as well and have participated in subsistence and personal-use fisheries too. I have served for over ten years on the Sitka Fish & Game Advisory Committee (including two terms as chairman) and continue to serve on this committee. I am a board member of the Alaska Troller's Association and the Chum Troller's Association. I greatly appreciate the wonderful opportunity for members of the public to provide so much input in the process of changing fishing regulations. Alaska's system of making the knowledge of local fishermen inherent to the process is truly extraordinary and extraordinarily valuable. I hope that the members of the Board of Fish will be able to truly listen to those of us with decades of firsthand experience on these waters and then to apply broader knowledge to craft the solutions best for the long term benefit of the fish and the local residents. I appreciate your taking the time to read my opinions below. Thank you.

The most significant and consequential actions that the BoF will take at this meeting will be on the Unuk and Chilkat/King Salmon River Action Plans. The proposed Option Cs would eviscerate the Alaska-based trollers – especially those with smaller boats in rural SE, to the benefit of the handful of down-south boats, so I'll begin my comments on that topic:



## Page 2 Fujioka Personal Comments

### King Salmon River:

- It is inappropriate to consider the King Salmon River Chinook run to be a stock of concern based on “a chronic ability, despite use of specific management measures, to maintain escapement for the stock’...(as determined by) a sustainable escapement goal<sup>1</sup>” because:
  - No meaningful<sup>2</sup> management measures *specific to the King Salmon River* have been imposed
  - Management measures specific to the King Salmon River Chinook can't be appropriately implemented until the saltwater behavior of these fish is better understood. This stock has never been Coded Wire Tag (CWT)ed, nor is it uniquely identifiable using current genetic techniques, so nobody knows which direction (or where) these fish go to upon leaving Seymour Canal (or even if they leave Seymour Canal).
  - There is wide disagreement within professional staff on how these fish might behave once in saltwater. The Draft Chilkat Action Plan suggests that it might be appropriate to assume that the King Salmon River wild fish behave like fish from the Chilkat (which is 80 miles as the crow flies to the north) or Unuk (160 miles to the south)<sup>3</sup> whereas the Pacific Salmon Treaty Chinook Technical Committee considers Crystal Lake hatchery (approximately 90 miles to the south) fish<sup>4</sup> to be the most appropriate surrogate. At the December 27, 2017 Sitka AC meeting, department staff said that Taku fish would be a valid proxy.<sup>5</sup> For an unknown reason, none of these experts suggested to use the historic releases (in 1993-1996) of

<sup>1</sup>From 2<sup>nd</sup> paragraph of draft Chilkat and King Salmon River King Salmon Stock Status and Action Plan, 2018. The first portion of the quoted phrase is from the Sustainable Salmon Policy 5 AAC 39.222.

<sup>2</sup>Seymour Canal has been closed to king salmon fishing for many years, but is not a meaningful restriction as there aren't enough salmon of any species in the area during the spring spawner run to warrant any fishing effort – either sport or commercial in the first place. At any rate the closure predates the recent downturn by many years.

<sup>3</sup>See *Harvest* portion of *King Salmon River* section of draft Chilkat Action Plan page 3.

<sup>4</sup>Ibid

<sup>5</sup>This even though the Taku run is known to be the earliest returning run in SE and is an outside rearing stock while historic weir passage on the King Salmon River indicate that is a much later stock and it is believed (but not proven) to be inside rearing.



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King Salmon River brood stock from Macaulay Hatchery less than 20 miles from the King Salmon River<sup>6</sup>. It appears that ADF&G is blindly grasping in all directions in an attempt to cover their lack of solid information on this stock.

- Furthermore, the lack of stock-specific harvest data, and the economically-insignificant size<sup>7</sup> of the King Salmon River run makes it is inappropriate to even have a Biological (as opposed to a Sustainable) Escapement Goal. Per <http://www.adfg.alaska.gov/index.cfm?adfg=specialstatus.akfishstocks>, a SEG should be “used in situations where BEG can not be established due to the absence of stock specific catch estimate;” The wide disagreement on an appropriate proxy and the need for this information clearly shows that the King Salmon stock lacks the *stock specific* catch estimate necessary for establishment of a BEG. Additionally, the BEG is fundamentally about maximizing yield. While sustainability is always a concern, there is no need to be concerned about maximizing the yield of a stock this small and lacks any directed harvest.

**Hence, I suggest that the BoF amend the draft action plan to remove references to the King Salmon River.**

#### Chilkat and Unuk Rivers:

- Many restrictions listed as options within the Unuk and Chilkat/King Salmon River plans, particularly on the troll fishery, are very broad-based rather than being specific to the individual Stocks of Concern. I ask that the BoF keep these Action Plans focused on the specific stocks. **Please don't impose broad restrictions that stop fisheries with insignificant harvests of the problem stocks.** The recommended actions should be ones that do the Stocks of Concern the most good while minimizing the lost harvest opportunities on other stocks.

<sup>6</sup>Relatively few of these fish that were released were found in any fishery – particularly the commercial fisheries. The Juneau and Upper Lynn Canal sport fisheries were the source of the largest number of those that were recovered.

<sup>7</sup>A couple hundred fish in a good year.

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- For example, Options B & C of both plans would close the winter troll season about a month and a half early<sup>8</sup>. Since 2004, there has been only 1 Chilkat CWT recovered from a troll Chinook in the entire late winter (Jan-April) period! While there are a few more Unuk CWTs recovered during the late winter troll fishery, the timing of the closure is not matched to the time of the season that the percentage of the catch that are Unuk kings peaks. If a winter closure were to be implemented on behalf of Unuk Chinook, it should cover weeks 8-11

and/or 17-18, % of Late Winter Troll Catch that is Unuk per CWT 2007-2016

but not weeks

12-16, as the

Unuks make

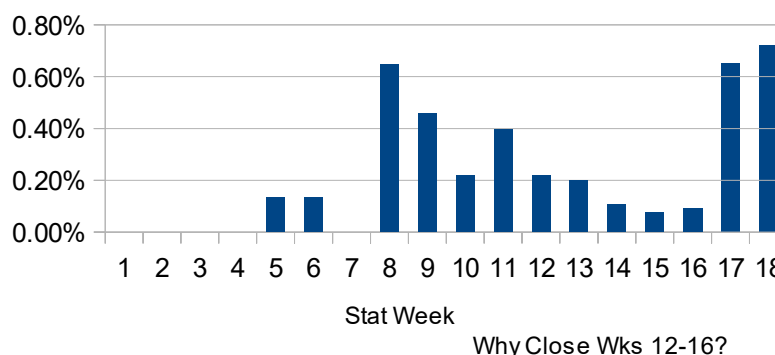
up a < 2/10<sup>th</sup>

of 1% of the

harvest

during this

time period.



- Neither the region-wide troll closure of May 29-June 14 listed under Option A of both plans, nor the full spring closure listed under Option C is an efficient means to protect either the Unuk or Chilkat stocks. During this time of the spring, while there are some southern districts where Unuk kings make up an elevated percentage of the catch,<sup>9</sup> in the northern part of SE<sup>10</sup>, Unuks comprised only about 6/10 of 1% of the harvest. The Chilkat harvest is even more concentrated. Outside of District 114, Chilkats have comprised only 7/100<sup>th</sup> of 1% of the troll-caught Chinook from that time period. Please refrain

<sup>8</sup>The Unuk Plan options B & C close winter troll on March 15. The Chilkat Plan Options B & C close winter troll on week 12, which in 2018 begins on March 18. Absent a premature closure, the winter season is scheduled to run until April 30 under current regulation.

<sup>9</sup>As high as 5% in District 1, but even this is fairly low in comparison to the catch in the Ketchikan sport fishery.

<sup>10</sup>Districts 9 and higher in aggregate





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from supporting wide-ranging management actions that act as sledgehammers when a precision scalpel-like approach is available.

- Restrictions of the Chatham Strait spring troll district (mentioned under Option A in both plans) are also a rather inefficient means protecting Unuk or Chilkat Chinook. Less than half of 1% of Chinook caught there are from the Unuk and  $<2/10^{\text{th}}$  of 1% are from the Chilkat.
- Similarly, the closure of the Tebenkof spring troll district (also mentioned under Option A of both plans) is not an efficient way to reduce harvest of these stocks either. Unuk fish make up  $<1\%$  of the total Chinook catch and Chilkat fish number  $<1$  fish in 6,500! The Chatham Strait restriction and Tebenkof closure may well be appropriate management tools for addressing the Taku or Stikine runs, but not for the Unuk or Chilkat.
- The delay of the summer troll opening is not likely to be an effective tool either. Over the last ten years, according to CWT expansions, the week 27-28 summer Chinook harvest has included only about  $7/10$  of 1% Unuk Chinook and  $6/10^{\text{th}}$  of 1% Chilkat Chinook. Practically speaking, how much lower can it go? There is no harvest data available to indicate that any significant savings would be accrued by postponing the July opener<sup>11</sup>. Actually, the historic CWT data indicates that the percentage of the harvest that consists of Unuk and Chilkat Chinook both *increases*<sup>12</sup> between weeks 27 to 28.
- Restrictions on the Taku (District 11) gillnet fishery which are mentioned in all 3 options of the Chilkat Plan, are similarly ineffective in terms of reducing the catch of Chilkat Chinook since 89% of the gillnet-caught Unuk Chinook are from District 15. Only about 5% of the total gillnet harvest of Chilkat kings come from District 11.

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<sup>11</sup>And it is clear that a delay will disrupt the traditional coho fishery, make cheating (by stashing kings ahead of the opening) much easier, and eliminate value of the CPUE statistic as a valid comparison to past years.

<sup>12</sup>Very slightly – perhaps not to a statistically significant degree, but nonetheless suggesting that delaying the July king opener is as likely to increase, rather than decrease the number of Unuk and Chilkat Chinook that are caught. While it may be plausible that Unuk spawners would be less abundant in saltwater later in July, the same is true of the majority of stocks that are harvested in the fishery. Thus there is no assurance that the Unuk fish would comprise any lower percentage of the catch.

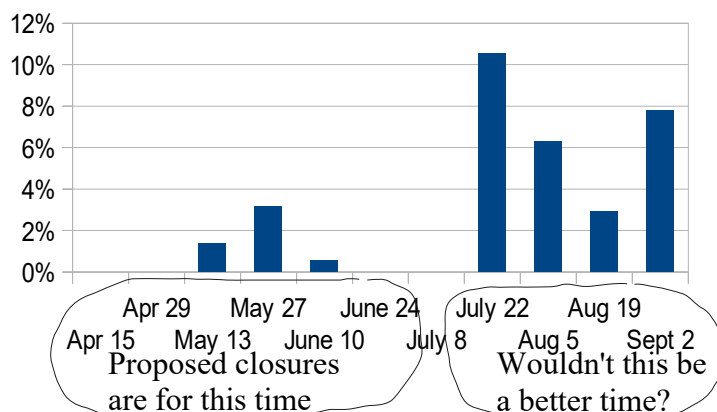


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- All three options of the Chilkat plan call for District 15C gillnetters to be potentially limited to the “postage stamp”. This approximately 12 square mile area contains the best sets in the area. It includes the prime 2/3s of the southern boundary line and the funneling mainland shore. There is no data to support the notion that requiring the fleet to fish in the honey-hole will do anything to reduce Chilkat Chinook catch.
- Similarly, reducing gillnet time in the Boat Harbor THA will do very little to protect Chilkat Chinook. Only 1 out of 65 Chilkat CWTs from the District 15 gillnet fishery has come from the THA. It would be more far more effective to delay the opening of the traditional District 15 fishery until the Chilkat spawners have passed, and in the meantime allow aggressive fishing for hatchery chum in the THA.
- All three Chilkat options would close parts of the northern inside sport fishery beginning April 15. This is unnecessarily early given that the earliest date that a Chilkat CWT has been recovered in the sport fishery in the past 11 years is May 8.
- All three Chilkat Options close the Juneau sport fishery beginning April 15 for various lengths of time. This is about a month before Chilkat CWTs begin appearing in the Juneau sport fishery. The Juneau closures under the three options last from 2 to 3 months, but even Option C reopens the Juneau area on July 15. For

efficient % of Juneau Sport Chinook that are Chilkat per 2004-16 CWT

protection of  
Chilkat  
Chinook, the  
closure should  
be much later  
in the season as





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Chilkat make up a much higher percentage of the Juneau sport harvest later in the summer.

- As a general rule for prioritizing closures within a given gear group, the times/areas with catches that have the highest percentage of Unuk or Chilkat Chinook should be the first to be closed. While Troll Option B is structured in a manner that appears to adhere to this philosophy, it counts *all SE wild* Chinook, rather than just those from the stocks of concern. Please correct this oversimplification<sup>13</sup>. Unlike most of other salmon fisheries in the state, the SE Chinook fisheries are limited by a quota set by international treaty. This quota is much lower than the biologically-allowable surplus of the combination of Chinook stocks that are harvested. Hence, as long as management is done in a reasonably smart manner, the full quota can (and should) be taken without over-harvesting any stock. This is the fundamental basis for what is known as *Aggregate Abundance Based Management* (AABM) which is how the Pacific Salmon Commission defines the SE Alaska Chinook fishery. In the rare cases where Alaska stocks need special protection, **closures should be concentrated in time/areas where the Stocks of Concern comprise the highest percentage of the catch and fishing effort in times/areas where they make up the lowest percentage of the catch should be increased.** When a clean area is accidentally closed, it eliminates the possibility of using that fishery to *lower* the overall impact on the stocks of concern. I suggest that **the BoF direct staff to only apply management actions to those times/areas where the relevant Stock of Concern comprises a relatively high percentage of that fisheries' catch.**
- Most of the sport options listed in the draft Action Plans will impede local resident anglers much more than non-residents. Historically the BoF has directed that when extreme austerity is necessary in the SE sport Chinook fishery, that the reductions be borne 80% by non-residents and 20% by residents. The options that

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<sup>13</sup> There may be a need for department staff to impose closures based on concerns for other stocks like the Taku & Stikine (as was done in 2017), but those concerns shouldn't be included in stock-specific plans for the Unuk and Chilkat Rivers.



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are presented will not come close to this ratio. Many of the them have components that impose 1/day & 3/yr bag limits for all anglers in certain waters. While the annual limit is highly restrictive to residents (who have never before been subject to annual limits in SE), the 3/yr is likely to be equal to or even more liberal than 2018 region-wide annual non-resident limit<sup>14</sup>.

So, what alternatives would better protect the Unuk and Chilkat Chinook with less painful consequences for Alaskan fishermen? Firstly, I suggest that rather than pointing to specific closures or restrictions, the **BoF should set a target Harvest Rate for each gear group** for each stock and let department staff use historical information to tailor management to achieve it. It is difficult to estimate the actual reduction in harvest of many/most of the suite of options provided in the draft plan prior to implementation. Hence there is no way for the BoF to know in 2018 if any particularly combination will be insufficient, adequately balanced, or unnecessarily restrictive until they have been tried, hence I suggest that the BoF endorse Harvest Rate goals rather than specific management actions, but if the board does want to contemplate specific actions, I suggest that:

- To ensure that 80% of the reductions of sport-caught Chinook are borne by non-residents, I suggest 1/yr annual limit for non-residents fishing in the restricted zones and 1/day with variable annual limits for residents.
- Chilkat gillnet restrictions should be confined to the District 15 traditional fisheries, as restrictions elsewhere would be ineffective, seeing as how few Chilkat Chinook are caught in any other gillnet district.
- Troll restrictions for Chilkat Chinook be confined to the spring fishery in District 114 and the adjacent Lisianski Strait (113-95) spring sub-district. Over half of the total region-wide, year-round troll catch of Chilkat Chinook have come from

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<sup>14</sup>The non-resident annual limit is set by the SE King Salmon Management Plan. Under that plan, when the Abundance Index is < 1.2 (which it is likely to be in 2018), the region-wide non-resident annual limit is 3 kings from Jan 1 to July 1, then drops to 2, and then 1 king after that. Both Action Plans contain “restrictions” that would set a 1/day, 3/yr limit – even after the region-wide non-resident annual limit would have dropped lower than this.



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these waters during the 2 month spring fishery. Chilkat Chinook comprise 2.9% of the overall spring troll harvest in District 114 and 3.5% in sub-district 113-95. While this is low in absolute terms, in the remainder of the region, Chilkats comprise only about 0.06% of the spring catch!

- Unuk restrictions for all gear groups be focused on restoring the policies that existed prior to 2012. In the years since then the combined exploitation rates on Unuk Chinook have been considerably higher than other wild SE Chinook systems. This has directly led to the recent string of under-escapement. As alluded to on Page 2 of the draft Unuk Action Plan, if harvest had remained at the pre-2012 Harvest Rate, the escapement goals would have been met every year from 2012-2016. This requires:
  - encouraging SSRAA to greatly reduce or eliminate the release of King Salmon at Neets Bay, thus making the nearby waters (which are on the corridor to the Unuk River) much less attractive places to fish
  - eliminating (not just stopping for two days per week) the aggressive net rotations in outer Neets Bay
  - cutting back Ketchikan area spring troll harvest of Unuk Chinook to pre-2010 levels
  - restricting sport harvest of of Unuk Chinook in the Ketchikan area to pre-2012 levels

Thank you for giving this topic the thoughtful deliberation that it deserves. Making smart decisions about these Actions Plans should be the highest priority for the BoF at the January meeting.

And as for the published proposals, I have some thoughts there too:

### Shellfish:

Proposal 93: I OPPOSE this proposal to open a commercial purse seine squid fishery. Much more needs to be known about the resource prior to allowing such an effective means of harvest as a commercial seine. The current conservative regulations do not



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allow squid to be taken with any sort of net even in the personal-use fishery. Given that the resource is small and little studied, dipnets and castnets for personal-use should be allowed well before commercial seines.

### Herring:

I have harvested herring roe-on-kelp for many years. The 2017 spawn was the lowest quality that I have seen since moving to Sitka in 2001.

Proposal 94: I OPPOSE this proposal to reduce the herring spawn ANS. The proposer's arguments are faulty. While there are always accuracy concerns with any self-reported harvest information (including the subsistence herring egg harvest data), the ANS was based on data gathered from the same sort of survey that is currently being used. Through many hours of debate at the Sitka AC meetings of November 29 & December 6, 2017, the proposers never presented any reason to believe that the accuracy of the historic surveys that the ANS was based on would be have any different than more recent surveys. Sure, it is possible that some harvesters overestimate the weight of the eggs they have gathered, but the historic surveys that the ANS is based on are likely to be affected to the same degree, hence any errors of this nature would offset.

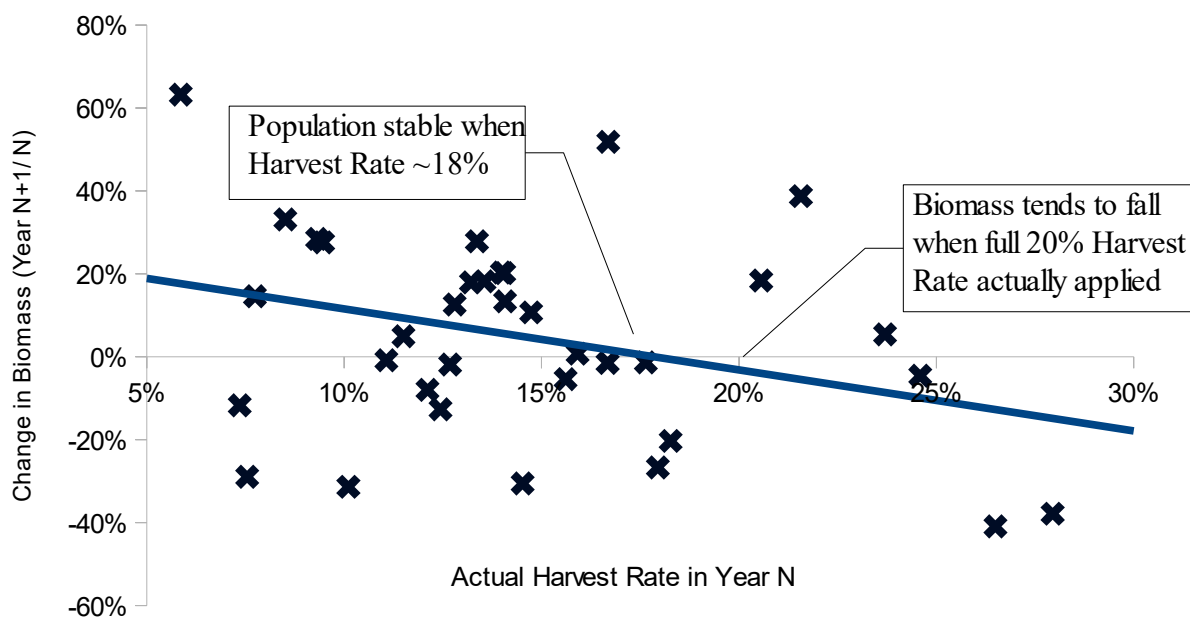
Another justification offered by the proposers is that they are unable to give away more than 30,000- 40,000 lbs of eggs. This give-away program represents only a small fraction of the local demand for herring eggs. Subsistence as an activity fulfills many needs – including spiritual, cultural, social and nutritional. The give-away program that the proposer refers to addresses only the latter need. This program could be viewed as analogous to food stamps. In a time of persistent hunger, people are willing to take a handout, but food stamps are no substitute for employment. They don't provide for dignity, self-fulfillment or personal growth- and neither does the herring egg- handout program. Please, don't confuse it with subsistence.

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Proposal 99- I support the AMENDED version of this proposal that was unanimously supported by the Sitka AC on November 29. We voted to ask the BoF to apply the more conservative harvest rate formula that is used in the rest of SE to the Sitka area. The initial threshold should remain at 25,000 tons which would allow for a 10% harvest, but the harvest rate should not increase as rapidly as it does under the current formula. The general SE formula is appropriately more conservative.

Under the current formula, the target harvest rate has been 20% nearly every year. Fortunately the actual harvest has generally been short of this amount primarily due to forecasts that have underestimated the biomass. I use the word “fortunately” because a retrospective analysis shows that when the actual harvest rate has been 20% or more, the biomass has tended to fall the following year as shown in the graph below.

### Sitka Sound Herring Stock Declines with Increasing Harvest Rate:1981-2016



Data taken from  
<http://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareasoutheast.herring#harvest>





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The Sitka herring biomass has been stable when the actual harvest rate has been around 18%, and growing when the harvest rate is less than this. Please reduce the typical target harvest to no more than 18% until the biomass reaches much higher levels. We shouldn't continue to rely on incorrect forecasts to keep this key forage fish population from declining.

Proposal 104: I OPPOSE proposal 104 to eliminate the Sitka herring sanctuary area. During the 2012 board cycle, the Sitka AC submitted a proposal asking the Board of Fish to designate a herring sanctuary in Sitka Sound closed to commercial harvest. The specifics of the area were left to the board and stakeholders to determine. The Board of Fish ended up adopting the boundaries described in an RC submitted by the commercial seine group (SEAS). The area was a very reasonable compromise with the promise of protecting a portion of the stock while allowing plenty of area open for seine harvest opportunity. The seine fishermen are exhibiting bad faith in submitting and supporting Proposal 104 to get rid of the sanctuary that their RC defined and created in 2012.

Proposal 106: I offer this COMMENT: The BoF should adopt a more conservative management policy for the Sitka herring fishery. In SE and other parts of Alaska, we have seen several once-healthy herring populations crash and not recover – some of them (Lynn Canal near Juneau for instance) have been in depressed status for decades. These cautionary historical examples ought to be heeded. If the BoF adopts Proposal 99 as Amended by the Sitka AC to utilize the general SE Harvest rate formula, then I don't see the need to also adopt proposal 106. However if the BoF decides to retain the current aggressive harvest rate formula used only in Sitka, then I ask the BoF to support proposal 106 enlarging the sanctuary area as an alternative conservation measure.

### Groundfish:

Proposal 113: I submitted and SUPPORT this housekeeping proposal to specifically allow the “closely trimmed skeleton” of otherwise-restricted groundfish species to be used as bait. This updates the language of commercial regulation 5 AAC 28.190(1) to



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once again make it identical to the statewide sport regulation 5 AAC 75.026(b) which was updated by the BoF in 2013. The newer language more closely follows the original intent (“to allow all waste products- anything that would be headed to the grinder”) of the current language of 5 AAC 28.190(1) as it was described by the ADF&G Groundfish Manager at a Dec 6, 2011 Sitka AC meeting when the last revision to this regulation was discussed.

Proposal 116: I support this proposal to limit the growth of the charter blackcod catch. According to information provided to the Sitka AC by ADF&G on November 1<sup>st</sup>, 95% of the sport harvest of blackcod is by non-residents. Seeing as how this resource has been fully utilized for decades – even without any significant non-resident sport harvest, the growth of the charter sector into blackcod is displacing other users. By extending the reasonable non-resident limits that currently apply only to District 12 to the rest of SE, the resident users of all gear types will at least be somewhat protected against the rapid growth of the charter industry into this resource.

Proposal 123: I OPPOSE proposal 123 since many of the fisheries/areas that it would apply to do not currently reach their lingcod allocation and this proposal would further reduce harvest. Specifically, lingcod bycatch in the salmon troll fishery in Central Southeast Outside (CSEO) is the fishery that I participate in that would be affected by the proposal. The allocation for this fishery was established based on historic catches from years when the Sitka LAMP was open to lingcod bycatch. Now that the LAMP is basically closed to troll bycatch of lingcod, the harvest in the fishery is routinely well short of the allocation. There is no need to further reduce this catch.

Even if applied just to the fisheries that routinely reach their allocation (which might pose challenges for enforcement), this proposal would shift a higher percentage of the volume of the harvest from males to females (which are generally larger) which could be biologically sub-optimal.



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The current sport size limit is not a conservation restriction, but a management tool. The sport size limits (and closures and bag limits) have historically varied as sportfish management has attempted to keep harvest within the GHLS despite increasing effort. The charter industry has always preferred a fixed size limit rather than starting the season with liberal regulations and closing an area in mid-season once the GHL was taken. The commercial fisheries that are the target of this proposal are managed via in-season closure when the GHL has been harvested. Both methods can work – and are the preferred method of their respective fleets.

Proposal 124: I ask the BoF to take **No Action** on this proposal. I submitted this proposal, believing that the increase in lingcod harvest would be biologically insignificant. While I still maintain that to be the case, subsequently the Sitka AC has offered the opinion that the Sitka Sound lingcod resource is already fully-allocated and that they are satisfied with the current allocation. As the BoF is directed to give deference to local ACs, I can not in good faith ask the BoF to go against this policy and override the position of the only relevant AC.

Proposal 126: I OPPOSE this proposal. The requirement to carry a deep water release mechanism is unduly burdensome on casual sportfishermen. Requiring all sportfishing vessels to carry a rockfish release mechanism is unnecessary. Some people sportfish out of very small craft- canoes, kayaks, etc. where any extraneous gear would be in the way. Many people sportfish but a few times a year, or fish only in shallow water where rockfish have no problem re-submerging. Furthermore, a large portion of the sportfish effort occurs in areas that have very few rockfish – places where it is rare to catch even one, let alone enough to be over-limit. For instance per the ADF&G's Sport Fish Survey<sup>15</sup> over the 2013-16 period, the Juneau area has averaged 113,000 angler-days of effort resulting in an average of only 19,500 rockfish/year. That's one rockfish (of any type – so some are non-pelagic and others are pelagics which have a separate and much more generous bag limit) for every 5.8 angler-days. I cite statistics for Juneau as it is the most-

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<sup>15</sup> See <https://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm>.

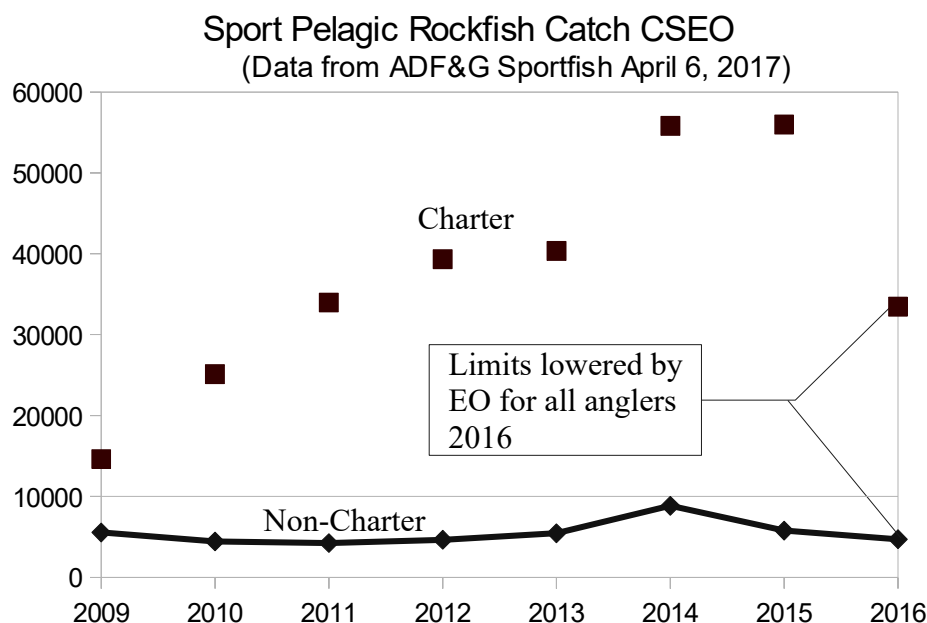
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fished sportfishing port in Southeast, but rockfish are even less common in some other parts of SE. For instance in the Kake, Petersburg, Wrangell, Stikine area the average is one rockfish every 7.6 angler-days. While rockfish are abundant in certain parts of the region, much of SE has so few rockfish that accidentally exceeding one's limit is virtually impossible, hence there is no need for release mechanisms to be mandatory for casual anglers.

Proposal 127: (Note: the proposal summary by Board Support implies that this proposal is about reducing the resident sport bag limit for pelagic rockfish, but the proposal is actually intended to *prevent* that from happening unless biologically necessary.) I submitted and SUPPORT this proposal to protect resident sportfishermen from recent restrictions that have been imposed by EO in 2016 & 2017, and now are proposed to be made into standing regulation (see ADF&G's Proposal 128). Non-charter (i.e. resident) sport harvest has been steady for many years during which time the charter harvest has doubled or tripled.

ADF&G is appropriately concerned about this rapid increase in harvest, but the mandate for the

department to  
be non-  
allocative  
limits their  
choices to blunt  
tools that strike  
non-residents  
and residents  
alike. I ask that





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the BoF hold residents of Sitka and other Alaskans harmless, as the problem is not of our making.

I should also point out that this conflict is strictly within the sport sector. The total commercial harvest of pelagic rockfish in CSEO is quite small- having averaged less than the non-charter sport catch over the past decade<sup>16</sup>. In 2014 & 2015 (the years just prior to the bag limit reduction) the charter fleet alone accounted for over 2/3 of the total (sport and commercial combined) pelagic rockfish harvest in CSEO. Please protect local residents (often times kids with their parents) from the growth of charter rockfish catch.

Proposal 127: I OPPOSE reducing the bag limit for resident sport fishermen for pelagic rockfish in order to address a conservation concern caused by the rapidly increasing charter harvest. **PROPOSAL 126 to hold the resident anglers harmless unless their catch equals the non-resident catch, provides a more appropriate alternative.** Please be proactive about protecting local residents from the growth of the charter catch. The BoF has ample precedent for providing more liberal regulations for resident sport anglers, having done so in the past for king salmon, lingcod and non-pelagic rockfish throughout SE.

Salmon: King, Enhancement, Mgmt Plans, Misc.

Proposals 132, 133 & 134: I OPPOSE these three interlinked proposals and ask that the BoF not over-react to the recent downturn in SE Chinook runs by making permanent regulatory changes to address a temporary issue. Overall the proposed changes are far too draconian to impose when 85% of the returning Taku Chinook already escape to spawn<sup>17</sup>. There are many other problems with these proposals including:

- The proposals would restrict trolling (Proposal 133 and potentially 134) even when the Taku return is *above* the optimal spawning escapement- even though the Taku forecasts are for terminal run – i.e. the troll harvest in the districts that these

<sup>16</sup> The decade's average of 14,679 round lbs/yr comes out 3,670 fish/yr assuming an average weight of 4 pounds.

<sup>17</sup>Per the most recent version of the Pacific Salmon Commission's Joint Chinook Technical Committee's work: *2016 Exploitation Rate Analysis and Model Calibration Supplement Data Notebook Report TCChinook (17)-01* Appendix C50, the last four years the escapement rates were 2012: 77.2% 2013: 89.0% 2014: 87.0% & 2015: 82.2%.



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proposals seek to close is already built into the forecast. If the run will meet escapement goals, there is no need to consider restricting trolling, as this harvest has already been accounted for.

- Proposal 133 in conjunction with 132 is highly biased against troll fisheries. They require a major loss of fishing time (from 7 days/wk to 4) over 3 entire districts even when the Taku run is forecast to be above the MSY point, while sport restrictions for Taku kings are limited to a small closed area and traditional gillnet fisheries are allowed to proceed without any restriction. When the forecast is for the Taku run to be very near MSY, the proposer seeks to cut fishing time in troll fisheries over 100 miles away from Taku River by up to 70% while most of the popular Juneau sport fishing areas remain open and the Taku gillnet fishery makes only token restrictions. A Taku forecast *within* the escapement range but in the lower third would close all trolling for 2-1/2 months over three entire districts (not including the two districts closest to the Taku that are already closed to trolling during that time). This is ridiculous considering that the escapement goals are set such that the yield from an escapement within the lower third of the goal is still very near the most that can be expected to be sustainable.
- Proposals 132 and 133 are being supported on the erroneous claim that “Years of fishing on escapement is to a large-degree why these stocks are at all-time lows.” In actuality, both the Pacific Salmon Commission's Joint Chinook Technical Committee<sup>18</sup> and ADF&G<sup>19</sup> clearly state that poor ocean survival – *not harvest*, is the cause of the low Taku runs.
- Proposals 133 and 134 would close/restrict all spring trolling in districts 9, 12 & 14- including the spring chum fisheries. These BoF specifically developed management plans for these chum troll fisheries to permit them to continue even if Chinook concerns arose.

<sup>18</sup>“The Taku river stock has shown declining productivity in recent years and the primary factor is reduced marine survival.” -Page 38 *Annual report of Catch and Escapement for 2016* Report (17)-2

<sup>19</sup>“The (Taku) stock exhibited a decline in productivity in recent years due to reduced marine survivals.” Page 32 Appendix A10 *Review of Salmon Escapement Goals in SE AK, 2014* FMS 14-07 by Steven C. Heinl, Edgar L. Jones, Andrew W. Piston, Philip J. Richards and Leon D. Shaul.



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- Proposal 132 would restrict sport fishing in District 15 (close to the Chilkat River, but not on the migration path for Taku fish) based on the forecast for the Taku—even if the Chilkat was expected to produce a large surplus that year.
- The restrictions that these proposals seek to impose on gillnet fisheries in the Taku estuary, sport fisheries occurring 10-50 miles from the river and troll fisheries taking place up to 120 miles from Taku River are all scheduled to occur simultaneously. Migrating Chinook will pass out of the distant troll fisheries while they are still abundant in the terminal areas, yet all of the fisheries are scheduled to be closed during the same dates.
- Proposals 133 and 134 would restrict trolling in distant districts based on a Taku forecast that already takes this harvest into account. Per Pacific Salmon Treaty Annex IV Chapter 1.3(b)(3)(vii) footnote 6, the official Taku forecasts already accounts for all harvest outside of District 11.
- These proposals do not address the harvest of Taku kings caught in the Petersburg-Wrangell sport fishery. From 2004-15, an average of 13% of the sport-caught kings from this area were Taku Chinook<sup>20</sup>.
- The Taku forecast that would trigger restrictions (directly in the case of Proposals 132 & 133, indirectly in the case of Proposal 134) is regularly inaccurate. The average preseason forecast is off by 35%<sup>21</sup>! This means that in *most years the actual return will not be within the same 1/3 of the escapement range as the preseason estimate, so the wrong set of restrictions will have been triggered*. The proposals lack a detailed means to incorporate in-season information when the preseason forecast is wrong which has been more often than not.

Proposal 137: I SUPPORT this proposal to increase the *resident* sportfish possession limit of Chinook in years when the abundance (and hence the sport quota) is very high. The non-resident sport king salmon catch has exceeded the resident catch in most years –

<sup>20</sup>See pages 43-45 of *Mixed Stock Analysis of Chinook Salmon Harvested in the SE AK Sport Fishery 2004-2015* (in prep) by ADF&G's Sara Gilk-Baumer et al. In 2008-2010 Taku fish comprised more than **19%** of the Petersburg/Wrangell sport catch.

<sup>21</sup>The Mean Absolute Percent Error (MAPE) in the Taku River Chinook forecast is 35% according to Table 3 on page 14 of *Forecasting Annual Run Size of Chinook Salmon to the Taku River of Alaska and Canada* FMS 14-08 by David R. Bernard and Edger L. Jones III.





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and this is especially the case in years of higher abundance. This biological effects of this proposal are very modest. Additionally, if the additional resident harvest is tempered by keeping the non-resident annual limit at the normal level rather than allowing it to increase to an unsustainable level in high abundance years, this will contribute to stability in non-resident limits – which is something that sportfishing businesses commonly ask of the BoF.

Proposal 138: I SUPPORT this proposal to allow retention of other species when fishing with 2 rods for Chinook is allowed for residents. At this meeting, the BoF may be tempted to overlook the rare occasions when Chinook are abundant and dismiss this proposal. I urge you to pass it instead, thus brightening the light at the end of the tunnel for local residents.

I should point out that the increase in harvest due to a second rod – even for Chinook which are the target species, has been so small that ADF&G has been unable to produce any data on it. Such a small fraction of the total sport effort and catch occurs using 2 rods, that any increase in harvest of non-target species would be negligible.

Proposal 139: I OPPOSE this proposal to overturn the current Southeast Cove THA Management Plan that splits access to the area between the trollers and seiners, the two gear groups which are currently (and have been historically) behind in their allocation of enhanced salmon as defined by 5 AAC 33.364 *SE AK Area Enhanced Salmon Allocation Management Plan*. Under BoF Findings 94-148FB the 13<sup>th</sup> *Guiding Principle of Enhanced Salmon Allocation in SE* states that harvest opportunity in terminal area fisheries should be the first tool used to correct imbalances in allocation. The BoF has properly limited fishing in this area to the seine and troll fleets. For the BoF to delegate the authority to allocate this opportunity directly to the NSRAA board as the proposal asks, would be irresponsible and risks further exacerbation of the allocation imbalance. As noted in RC 2, (page 131) the BoF has previous decided that in accordance with 94-148FB, the SE Cove Management Plan should only be changed to allow gillnetting if and



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when their share of SE Enhanced Salmon drops below their allocation. Seeing as how gillnetters have caught close to double their share for the last decade, this is not the time to allow additional gillnet opportunity.

Proposals 140-143 & 145: I offer this COMMENT: These proposals all reference the imbalance of enhanced salmon harvest between the gillnet and seine fleets and seek to address the imbalance through terminal area harvest opportunity. While this is fully consistent with the 13<sup>th</sup> Guiding Principle established in BoF Findings 94-148FB, the elephant in the room in all four of these proposals is that the troll fleet is much further behind their allocation than the seine fleet. Any argument along these lines to tilt the harvest towards the seine fleet, is even more applicable to increasing the troll share.

Proposal 144: I SUPPORT this proposal to provide additional opportunity to the troll fleet to harvest hatchery-produced salmon at Deep Inlet. Per the terms of 5 AAC 33.364(c) the BoF is to provide such opportunity to the troll fleet due to the established pattern of being well below our allocated share of the harvest. Unlike the *PWS Enhanced Salmon Management Plan* which automatically provides additional harvest opportunity to the gear group that is behind, the SE plan directs the BoF to initiate this action. This proposal is highly conservative, in that it does not ask for exclusive troll access, but only opportunity concurrent with the net fisheries. This would be of most value when trolling is otherwise closed (August coho closure) or when the net fleets have dwindled to token levels late in the year. It should be noted that concurrent opportunity is neither new or unworkable, as most SSRAA THAs already are managed this way.

146: I OPPOSE this proposal to exclude certain SE hatcheries from the allocation defined by 5 AAC 33.364. The sharing of hatchery fish was a universally-agreed-to compromise described in BoF Findings 94-148BF. These findings are the consensus agreement of a committee that what charged by BoF Chair Mike Martin in 1991 to develop a plan for sharing “all enhanced salmon<sup>22</sup>” in Southeast. To radically change the intent of the entire

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<sup>22</sup>See first sentence of *Background* section in 94-148FB.



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allocation plan at this late date would be extremely disruptive to industry and contrary to the original direction of BoF chair Martin.

Proposal 150: I suggest that this proposal be AMENDED to change the eastern boundary line of the all-gear SHA from 135° 11.05' to somewhere around 135° 06'. The Crawfish Inlet release site was established as a means to help relieve some of the enhanced salmon shortfall that the troll fleet has chronically suffered. While some non-troll harvest is required under the terms of the Department permit in order to limit straying, this need is limited to the extreme terminal area. The greater the area in which cost-recovery or common property net fishing occurs, the less beneficial this project will be to the troll fleet – which was the original justification for the release site in the first place.

Proposal 155: I OPPOSE this proposal to remove an effective and necessary conservation measure to protect northern inside sockeye stocks. Sockeye systems on the Juneau road system are currently seeing such small returns that sportfishing is closed entirely on the Mendenhall Lake and Auke Lake systems and limited to just a few days per year on the Windfall Lake system. Please do not allow increased exploitation of these stocks. It should be noted that fish returning to these Mendenhall and Auke Lakes are not exposed to any gillnet fishery – the Chatham Strait seine fishery is the only commercial net fishery that they have to pass through and yet the runs are still not large enough to support any sport fishing.

Proposal 157 & 158: I SUPPORT these functionally-identical proposals. Despite lasting just 2-4 days per year, the hatchery seine fishery at Amalga Harbor has significant sockeye bycatch<sup>23</sup>. Fortunately a management plan already exists to address seine bycatch of sockeye in northern Southeast inside waters (5 AAC 33.366). However, the original language in that regulation is ambiguous as to whether or not sockeye caught in the Amalga fishery should have been included. (5 AAC 33.366 predates the opening of the

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<sup>23</sup> The annual average catch since the common property fishery began in 2012 has been about 2,700 sockeye per year.



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Amalga SHA to common property seining, so this ambiguity shouldn't be surprising.) The 2015 proposal by SEAS to only count these fish against the cap some of the time, and then to only count some of them was an absurd compromise that has now expired through a sunset clause – Good riddance! The BoF now has the opportunity to replace it with a sensible conservation measure to count all wild sockeye caught in this fishery towards the established 15,000 fish cap. Like the sockeye taken in the Northern Chatham fishery, the sockeye harvested at Amagla are northern-inside stocks and they should be treated the same way.

It should also be noted that the Amalga Harbor THA seine fishery takes place less than two miles from the mouth of Eagle River, through which sockeye destined for Windfall Lake have to pass. This Windfall sockeye fishery is a favorite of the Juneau flyfishing community. This small stream is where I learned to flyfish – that being the most effective way to sport fish for these sockeye. I have spent many hours either fishing, walking the 3 miles to or from the fishing hole, or tying flies that would be left in the various snags and branches of Windfall Creek. This run is the last remaining sockeye sport fishery on the Juneau road system – and unfortunately it is now barely viable as a fishery. This run is particularly vulnerable to over-harvest as it is not only small – with an average escapement count of only 519 fish<sup>24</sup> but over 90% of the returning adults have a single life history (1.3)<sup>25</sup>. With nearly all of the returning fish being the same age, this population lacks the protective redundancy of a typical multi-age return.

The department has a long history of imposing highly restrictive regulations on the Windfall sport fishery – with good reason given its popularity. It has been completely closed several times – beginning with an emergency in-season closure in 1991. Due to continued sockeye conservation concerns, sport fishing in Windfall Creek has recently

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<sup>24</sup> See page 243 of RC 2.

<sup>25</sup> See Table 19 of *Abundance, Age, Sex and Size of Sockeye Salmon Catches and Escapements in Southeastern Alaska in 1987* by Scott A. McPherson, Andrew J. McGregor and Mark A. Olsen published as ADF&G's Technical Fishery Report 88-12.

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been allowed only on Wednesdays and Saturdays during June and not at all in July<sup>26</sup>. The sport bag limit is one fish per day and five per year. Any additional harvest pressure on these fish would probably require that this unique sport fishing opportunity be fully closed again as it was during the summers of 1993 and 1994.

If the seine fleet is unwilling to accept a simple sensible measure to protect the Windfall Creek sockeye run, an alternative would be for the BoF to greatly reduce the size of the Amalga SHA. After all, the presence of so many sockeye in the harvest is adequate proof that the boundary lines were initially made inappropriately generous in the first place since SHAs are supposed to be restricted to areas without wild stock concentrations.

It should also be noted that the fishery may be having a significant impact on local king salmon including Chilkat and King Salmon River stocks as well as the Windfall sockeye.

Kings (all sizes) reported from Amalga SHA			
Year	Cost-Recovery	Common Property Seine	Total
2012	35	32	67
2013	2	144	146
2014	14	28	42
2015	37	18	55
2016	78	49	127
2017	101	103	204

Salmon: Seine:

Proposal 166: I OPPOSE proposal 166 to create a second seine index fishery about 9 miles north of an existing Point Augusta seine index fishery. In addition to the Point Augusta index fishery, there is also a long standing test fishery that occurs even closer to the area that this proposal seeks to open. In the years when there are adequate fish for a common property fishery, these waters are open to seining, but this proposal would jeopardize the health of northern-inside pink salmon stocks by harvesting them even in years of very weak returns. The recent even-year pink salmon escapement of *all of the stock groups in the Juneau area has been below goal*. Below is a slide from the 2017 Juneau Area Purse Seine Season Summary by ADF&G which was presented at the seine taskforce meeting on November 28, 2017.

<sup>26</sup>What this means is that sport fishing is allowed for only 9 days during the two prime summer months. The sockeye don't actually enter the system on most years until around the 3<sup>rd</sup> day that fishing is allowed, so really only around 7 days of sockeye sport fishing per year occurs.

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Juneau Management Area: Pink Salmon Escapement by Stock Group 2013-2017						
Stock Group	Target Range	Escapement Index				
		2013	2014	2015	2016	2017
Freshwater Bay	80,000 - 180,000	<b>67,850</b>	<b>20,080</b>	<b>62,850</b>	<b>36,061</b>	<b>63,150</b>
Homesore	30,000 - 70,000	<b>82,756</b>	<b>4,216</b>	<b>98,188</b>	<b>1,600</b>	<b>22,795</b>
Lower Lynn Canal	20,000 - 60,000	38,800	<b>1,786</b>	<b>154,306</b>	<b>4,493</b>	51,300
Upper Lynn Canal	30,000 - 70,000	<b>86,049</b>	<b>2,436</b>	<b>254,757</b>	<b>4,029</b>	<b>80,935</b>
N Chichagof	120,000 - 280,000	<b>398,900</b>	<b>16,640</b>	<b>325,663</b>	<b>25,852</b>	<b>337,920</b>
Seymour Canal	160,000 - 400,000	221,225	<b>51,470</b>	248,620	<b>63,020</b>	<b>110,030</b>
Stephens	110,000 - 250,000	<b>95,350</b>	<b>28,273</b>	178,551	<b>13,751</b>	179,464
SW Admiralty	100,000 - 250,000	236,460	<b>33,344</b>	<b>262,157</b>	<b>39,755</b>	<b>346,273</b>
Tenakee	210,000 - 510,000	442,003	<b>102,820</b>	398,574	<b>99,865</b>	432,683
West Admiralty	50,000 - 120,000	<b>153,225</b>	<b>5,224</b>	<b>49,804</b>	<b>8,905</b>	<b>31,700</b>

Bold numbers in red font are below management target range; underlined are above management target range

At least they were red in the original – they appear gray here.

Note that for several generations, the even-year returns from the West Admiralty and Lynn Canal stock groups (which are the pink salmon that would most likely be in the waters of this proposed fishery) have been only around 10-20% of the *lower* bound of the target range in recent even years. This sort of escapement makes even the Chilkat and Unuk Chinook runs appear healthy and robust by comparison!

It is further concerning to me that the department appears to exhibit unjustified optimism about next year. The 2018 Pink Salmon Harvest Forecast<sup>27</sup> for the first time since 2007, arbitrarily excludes data from NOAA's *SE Coastal Monitoring Project* because that information pointed to a very low 2018 return. The department's 2018 forecast justifies this omission by saying that “it is at least plausible<sup>28</sup> that the (2018 harvest) will be in line with recent averages for southern SEAK.”<sup>29</sup> Discontinuing use of the NOAA data after 11 straight years of incorporating it contrasts sharply with the high praise that it was given in the 2017 ADF&G SE pink salmon forecast<sup>30</sup> which lauds the NOAA data, saying that

<sup>27</sup>[http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/2018\\_se\\_pink\\_salmon\\_harvest\\_for\\_ecast.pdf](http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/2018_se_pink_salmon_harvest_for_ecast.pdf)

<sup>28</sup>They don't even try to make the case that it is probable – just that it *might* happen!

<sup>29</sup>[http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/2018\\_se\\_pink\\_salmon\\_harvest\\_for\\_ecast.pdf](http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/2018_se_pink_salmon_harvest_for_ecast.pdf), end of first paragraph under “Forecast Discussion” on page 2

<sup>30</sup>[http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/2017\\_se\\_pink\\_salmon\\_harvest\\_for\\_ecast.pdf](http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/southeast/2017_se_pink_salmon_harvest_for_ecast.pdf)

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including this information has led to “much improvement over forecasts made prior to 2007 (The last time that this NOAA data was not used)” and that including the NOAA data provides “the ability to predict if the harvest will be greater than average or less than average (which) is an immense improvement over past ADF&G forecasts.”<sup>31</sup> This seems like a mighty low bar.

*Salmon:Commercial Troll:*

Proposal 173: I SUPPORT this proposal to delete the sunset clause in 5 AAC 29.114 Districts 12 & 14 Enhanced Chum Troll Fisheries Management Plan. These spring fisheries have been conducted for 5 years now with minimal by-catch, gear conflicts or other issues. This has been a sufficient “trial period” for these fisheries to prove that they deserve to be made permanent. The current concerns over SE wild Chinook and the resultant heavy restrictions in the spring Chinook troll fisheries make the chum fisheries extremely important alternatives as there are very few other troll fisheries this time of year. The chum fisheries are fully compatible with Chinook conservation efforts due to the previously-mentioned very low by-catch. In contrast to by-catch in gillnet fisheries, unwanted troll-caught fish can be released just as sport-caught fish can. There has been no suggestion that sportfishing for chum salmon should be closed due to concerns over Chinook, so commercial trolling for chum salmon shouldn't be closed either.

Proposal 174: I SUPPORT this proposal to create additional spring troll opportunity in a manner that is consistent with the concerns for SE wild Chinook (See comments for Proposal 173 above.) and with the provisions of BoF finding 94-148BF which calls for creating additional opportunity to harvest enhanced salmon for gear groups that have been chronically behind their allotted percentage of the hatchery pie as trollers have been. If the department has concerns regarding bycatch of migrating wild stocks, I ask that the BoF direct staff to work with the proposers to reconfigure the boundary lines to alleviate those concerns rather than just dismiss the entire proposal.

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<sup>31</sup>Ibid, second paragraph under “Forecast Discussion” page 2

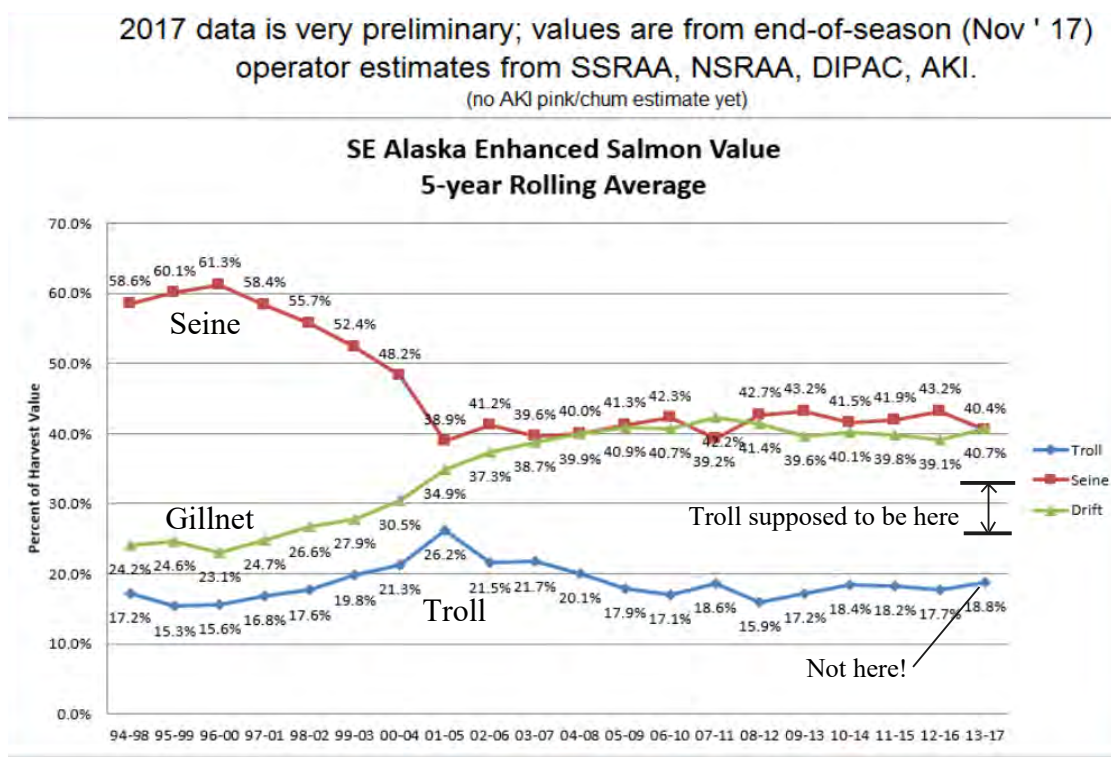


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Proposal 175: I agree with the intent of this proposal, but suggest that it be AMENDED so that the regulation would read:

(d)(3) When a spring king salmon troll fishery is closed, a person may not have king salmon aboard a salmon troll vessel while fishing for chum salmon in an area closed to trolling for king salmon.

Proposal 176: I SUPPORT this proposal keep the troll fleet from having to stop fishing for Crawfish hatchery chum during a closure intended to conserve/re-allocate wild coho. The proposed boundary for the chum fishery is highly conservative – very few fish other than hatchery chum are likely to be encountered – and those that are can be released due to the nature of troll gear. NSRAA received permits for this hatchery release site predicated on using it to address the persistent troll shortfall of enhanced salmon. The chart below of the NSRAA's calculated preliminary 2013-2017 5-year aggregate<sup>32</sup> indicates that the troll share of the SE enhanced salmon has remained well below the 27-32% range established by a consensus of the Southeast Alaska Allocation Task Force,



<sup>32</sup>This is slide 10 of [https://www.nsraa.org/\\_pdfs/2017\\_Fall\\_Board\\_Mtg/Adult\\_Ret\\_2017\\_Fcast\\_2018.pdf](https://www.nsraa.org/_pdfs/2017_Fall_Board_Mtg/Adult_Ret_2017_Fcast_2018.pdf)



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accepted as Guiding Principle 14 of BoF Finding 94-148 FB and codified as 5 AAC 33.364(a)(2). The present troll shortfall represents \$3-5M/year to the troll fleet. While proposal 177 will address only a tiny fraction of the deficit, it is a small corrective step.

Proposal 177: I SUPPORT this proposal to allow the department to identify areas where hatchery-produced coho can be targeted with troll gear when fishing on wild stocks is not permitted for allocation or conservation reasons. There are several locations where this could be allowed without significant impact on wild stocks- including:

- Bucareli Bay in front of the Klawock Hatchery which has produced over 100,000 coho for the last several years.
- Deep Inlet and Inner Sitka Sound- NSRAA's Bear Cove and Deep Inlet release sites produced 70,000 coho in 2017 – and production has been rising as this project is being ramped up.
- Mist Cove- downstream of NSRAA's Deer Lake release site, returns here have been inconsistent, but as this is not a broodstock collection site, trollers should be allowed to catch any coho returning here.

The flexibility of this proposal makes it easy for ADF&G to modify boundary lines and open/close areas as needed in response to wild stock concerns or hatchery needs. This is also but a very minor step towards addressing the multi-million dollar shortfall of enhanced salmon that are due to the troll fleet.

Proposal 180: I SUPPORT this proposal to permit the spring troll fisheries to operate as originally envisioned, even in years when an abundance of non-Alaskan fish are present. While I recognize the irony of a proposal addressing a problem caused by too many Chinook, that situation shouldn't be dismissed. In 2014, 2015 & 2016 “Treaty” Chinook were much more abundant than they typically are<sup>33</sup>. This proposal simply recognizes that in years when extremely large numbers of non-Alaskan fish are expected, they will constitute a larger-than-normal percentage of the spring harvest and directly drive down

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<sup>33</sup>During those years the returns to the Columbia River were higher than at any time since the Bonneville Dam was installed in the 1930's. These Chinook make the largest contribution of any stock to the SE troll catch.



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the percent of the catch that the Alaska hatchery fish make up. As the troll access to spring Chinook is managed based on the percentage of the catch that is AK-hatchery fish, the influx of non-Alaskan fish distorts the average.

I recognize that the current heightened concerns for Alaskan wild Chinook, may require other restrictions on the spring fisheries. ADF&G has recently provided numerous examples of where EO authority was used to stop harvest well short of the upper limits of the spring hatchery GHL ranges. I have every reason to expect this conservative approach to continue, and thus consideration of this proposal need not assume that it will have any detrimental effects on local wild stocks since the spring fisheries won't be prosecuted if doing so would threaten those runs. This also affects the troll imbalance of hatchery salmon. In the years when troll access to hatchery Chinook is prematurely closed, the troll fleet slips even further behind.

Proposal 181: I SUPPORT changing the current 70%/30% division of the summer troll Chinook harvest between July and August to 60%/40%. This proposal is notable because unlike most others that just re-allocate a resource from one fisherman to another, this proposal is about increasing the value of the resource. I support this regardless of whether the change is limited to certain levels of abundance or occurs every year. The price in August is typically higher than in July. Also the fish are frequently larger too. While the difference is not a huge, given the extreme closures that the troll fleet is facing due to wild Chinook concerns, an extra \$94,000 as estimated in RC 2 (page 204) would be appreciated.

In addition to these economic arguments, increasing the number of fish available for the August opener means an increased likelihood that the August opening can be managed in-season. The August opening is the last of the season so it is important that this "clean-up" opening be managed accurately to catch the remaining quota without excessive overages or underages that can result when the opening length has to be determined ahead of time.



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Any concerns regarding the possibility that the fleet might not be able to catch all remaining fish should the August quota be increased should be allayed by the realization that the overall quota was reduced by 15% as part of the 2009 Pacific Salmon Treaty. The practical effect of the proposal is to restore the August quota to approximately what it would have been had the 15% reduction not been imposed, and allow the entire 2009 cut to be absorbed in the July opener.

While historical trollers in Ketchikan felt that they would not benefit from increasing the August quota, in more recent years, the catch rates in the southern outside have been quite high in August when compared to northern areas.

As for the difference in impact to SE wild Chinook stocks, I find it interesting that the department would claim on one hand that the August opening had a higher proportion of Alaskan fish than the July opener, but in the name of reducing impact on wild stocks would also advocate for delaying the July opener – thus pushing it closer to the traditional time of the August fishery. When staff presents these sorts of contradictory arguments, the most reasonable conclusion is that the data on the actual difference in impact between July and August is probably highly ambiguous.

Proposal 184: While I am a power troller and directly compete with hand trollers for the same quota, I SUPPORT this proposal to give hand trollers more options. Hand-operated downriggers are permitted during the winter troll season, and it is entirely reasonable to allow them to be used during the spring and summer fisheries too.

A similar proposal was submitted last cycle, but not approved due to concerns raised by DPS regarding difficulties of distinguishing between HT-registered vessels that were commercial trolling vs. ones that were sport fishing. After BoF deliberations, I talked with the DPS representative who indicated that their concerns could have been allayed by a simple requirement that HT vessels that are engaged in sport fishing for salmon at a



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time/place open to commercial fishing must cover the “HT” letters that designate them as a Hand Troll vessel. Please give this proposal due consideration, and do not dismiss it even in the face of opposition from DPS until alternative identification methods have been explored.

Personal-use and Sport:

Proposal 186: I understand the issue that the proposer is attempting to address, but have the COMMENT that the proposed definition appears to be circular. When the middle phrase is removed, it reads that “A guest is defined as a person(s) who is... considered a guest.” I suggest that Department of Law be consulted to develop a better definition.

Proposal 199: I SUPPORT this proposal to liberalize the unnecessarily restrictive Juneau area Dolly Varden bag limits. The local population has long recovered from the lows of the bounty days and no longer needs the protection of the two fish limit.

Proposal 204: I am OPPOSED to the provisions of this proposal that would allow the harvest of more than one sockeye per day from Windfall Creek. The proposer claims to be concerned with excessive crowding. Increasing the daily limit would only increase the popularity of this location, exacerbating the problem. If the health of the run permits, I have no problem with increasing the number of days that fishing is allowed, as under current regulations the waters are only open to fishing 6-8 days per year that there are sockeye available to catch<sup>34</sup>.

Thank you for taking the time to read my letter. I know that it is lengthy, but I have many concerns.

Sincerely,

Tad Fujioka

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<sup>34</sup>Under current regulations Windfall Creek is closed during June and July except for Wednesdays and Saturdays in June. While this technically allows about 9 days of fishing, the sockeye historically don't enter the stream until the second week of June, thus leaving only 7 or so days when sockeye can be caught.



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Submitted herein are Territorial Sportsmen Inc. positions on proposed regulations of the Alaska Board of Fisheries, Sitka, AK, Jan. 2018. We appreciate the opportunity to comment in writing and orally at the meeting.

**SHELLFISH:**

**Proposal 75.** Author Nick Yurko

Reopen section 11-A to personal use shrimp fishing.

Position: **FAVOR.** This fishery has been closed for five years despite no stock status research. The 11-A Personal Use closure was based on poor CPUE by a small number of commercial fishermen in Barlow Cove. Barlow Cove is a tiny fraction of section 11-A.

**Proposal 76.** Author Aaron Woodrow.

Establish mesh size restrictions for sport shrimp pots.

Position: **OPPOSE** We assume the author means personal use pots rather than sport. Small spot shrimp are males and don't require special protection. Also requiring a large mesh size would reduce the personal use catch of smaller species of shrimp such as coonstripes or sidestripes, both of which are desirable personal use species.





**Proposal 82.** Author Nick Yurko

Close section 11-A to commercial shrimp fishing.

Position: **FAVOR** It was the small commercial fishery that resulted in the 5 years and counting closure of the personal use fishery. If the commercial fishery cannot survive in section 11-A due to not enough resource for two or three boats, it should be closed.

**FINFISH:**

**Proposal 96.** Author Rollin Young

Repeal the herring sac roe regulations for section 11-A.

Position: **FAVOR**

The herring stocks in section 11-A have not recovered from the abundance level of 35-40 years ago when there was a sac roe fishery in 11-A. If this fishery were ever proposed to reopen, the action should go through a new public hearing rather than implementing enabling regulations from 3-4 decades ago. The politics and support for local herring stocks have changed in 40 years. There are several interested groups who were not present or not active in the 1970's to speak on behalf of herring that now deserve a say in whether a fishery should ever be warranted in the local area. Sport fishermen, local Native groups, charter captains, whale watchers, conservationists all need to be heard before this fishery should ever reopen..

**Proposal 117.** Author Aaron Woodrow

Allow pots as legal gear for personal use sablefish.

Position: **FAVOR** Longlines are indiscriminate and do not target sablefish like pots can. The bycatch of sharks and skates and halibut will be far less and possibly near zero. Longline gear can be lost or tangled.



**Proposal 132 and 133.** Author Mike Bethers

Require abundance based king salmon management in the Spring fisheries in Northern Southeast Alaska based on the preseason king salmon forecast for the Taku River for both the sport fishery and the commercial troll fishery.

Position: **FAVOR** These proposals represent one logical way to tailor fishing pressure to abundance of Taku chinook, a stock that needs severe conservation measures to even survive.

**Proposal 134.** Author: Territorial Sportsmen Inc.

Close the Spring troll fisheries in districts 9, 12 and 14 whenever the Juneau sport fishery is closed to protect Taku chinook.

Position: **FAVOR** The Taku and Chilkat king salmon stocks are at all time lows and predicted escapements for both rivers are way below the minimum escapement goals. Both stocks have exhibited a downward spiral over the last ten years. Although the Territorial Sportsmen concur that poor ocean survival may be the major limiting factor it is imperative that we take every possible conservation measure to assure that every spawning king salmon reaching our coast makes it to the rivers. The Department of Fish and Game has adopted many of the measures this spring that were proposed by our organization three years ago in Sitka. However, those measures are too little and too late. There is a conservation crisis here. The troll fishery is the largest harvester of the spring Taku king salmon run and should participate fully in its conservation. Taku stocks (and Chilkat stocks) are taken in districts 9, 12 and 14.

**Proposal 173.** Author NSRAA Troll Reps

Remove the sunset clause allowing chum trolling to continue in districts 12 and 14.

Position: **OPPOSE for district 12**

The district 12 experimental June chum fishery has not been a success. When the fishery was created by compromise between Juneau sport fishing groups and the Chum Trollers Association 2



or 3 cycles ago in Ketchikan, the fishery was authorized based on the department's promise to monitor the fishery for juvenile king salmon bycatch. That study was never done. Since it was a lynchpin part of the agreement, the Territorial Sportsmen can no longer support the fishery without interception data. We oppose continuing the experimental fishery.

**Proposal 175.** Author F&G Staff

Prohibit king salmon possession aboard troll vessels when king salmon fishing is closed and the vessel is chum trolling.

Position: **FAVOR** This is a common sense housekeeping provision inadvertently omitted when the fishery was established in 2012.

**Proposal 192.** Author Mike Fox

Allow the use of drift gill nets in district 11 to take salmon for personal use during periods closed to commercial fishing.

Position: **OPPOSE** This proposal which includes all of district 11 creates myriad conservation problems with king salmon and potentially other species, as well as severe gear conflicts between gillnetters and sport fishermen. No gillnet dimensions or mesh size are proposed. No target species is specified and the proposal is too problematic and vague to be taken seriously.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Burnett".

Jerry Burnett

President, Territorial Sportsmen Inc.





Submitted By  
Tom Meiners  
Submitted On  
12/28/2017 10:11:27 PM  
Affiliation

#### Proposal 140

I support proposal 140, as a method for balancing the allocation plan amongst the gear groups. The gillnet fleet is at 150% of its allocation and has been for the last thirteen (13) consecutive five (5) year rolling averages. The gillnet fleet still has access to Anita bay fish through their traditional common property fisheries. Making Anita bay THA seine only will, however, allow the seine fleet access to a larger portion of Anita bay fish, and therefore help balance the allocation plan.

#### Proposal 141:

I oppose this proposal and the idea of linking Anita Bay and Deep Inlet harvest schedules. This proposal by the gillnet fleet, attempts to maintain the status quo, which has left the seine fleet out of its range for the last 11 consecutive 5 year rolling averages. It is also a poor choice to link the harvest schedules of two separate geographic areas. Both should be managed on their own to best optimize harvest in each area for both gear groups.

#### Proposal 142:

I support this proposal. This proposal by NSRAA to help rectify the enhanced allocation should be adopted. The gillnet fleet has been 150% of its allocation range for over a decade. Giving the seines more time in the Deep Inlet THA will provide a modest step toward seines getting into their range and gillnets returning to their range.

#### Proposal 143:

I support this proposal. Like proposal 142 this proposal provides for more seine time in the Deep Inlet THA and will provide for a modest step toward the seine allocation range and a small reduction to the gillnet allocation share.

#### Proposal 145

I support this proposal as another method to get more fish to the seine fleet, who have been below their allocation plan for multiple years, while the gillnet fleet has been ahead in its allocation.

#### Proposal 146

I oppose this proposal. This proposal by a gillnet permit holder is nothing but a poorly veiled attempt to institutionalize the gillnet fleets status of being 150% above the high end of their allocation range. The gillnet fleet simply doesn't want DIPAC, the major contributor to their allocation share, to be counted. The existing PNP hatcheries were initially engaged in the (current) allocation plan development, and their contributions to the fleets and allocation plan are considered during permitting of new production and through the RPT process and by the department.

#### Proposal 155

I support this proposal. The D12 Hawk Inlet area wild sockeye cap is a hard 15,000 fish cap on seine harvest of sockeye along the Hawk Inlet shore. This shoreline is also an incredibly abundant shoreline for pink salmon harvest, and seiners only opportunity to catch north bound pink salmon heading up toward Lynn Canal and Taku Inlet, major pink salmon producing areas. The sockeye cap limits managers to a limited allowable harvest of incidental sockeye salmon during a pink salmon directed fishery and does not fluctuate at all based on sockeye salmon abundance or escapement. Managers use this cap purely as an allocative tool, and do not have biological concerns about the seine fishery along this shoreline that must be addressed by this cap. Because of the cap, massive opportunity for wild stock pink salmon harvest is curtailed. The subsequent millions of northbound pink salmon go un-harvested due to a limitation on the seine fishery that is not correlated to sockeye abundance in any way. Removing this cap allow management to provide better in season, abundance based management for pink and sockeye salmon, versus the current, arbitrary sockeye harvest cap, which often curtails our pink salmon fishery. Lifting of this cap for the seine fleet would be ideal, but if this proves too difficult, at least a reimagining of the hard cap number is necessary for the seine fleet to harvest north-bound pink salmon.

#### Proposal 156

I oppose this proposal. This proposal is an attempt by the gillnetters to unfairly curtail the seine fisheries harvest of pink salmon based on



an unsubstantiated, fantastical view of the effects climate change may have on our fishery and greed. Extending the sockeye cap much like the sockeye cap itself, forces our managers to base pink salmon fishing time on an arbitrary sockeye number, not abundance, and WILL result in an incredible loss of pink salmon opportunity for the seine fleet, without concern for sockeye abundance or conservation. It seems unbelievable for the gillnetters to be calling for some kind of forced conservation concern on seiners when the gillnet fishery happens upstream of the seine fishery, on the same stocks, with near unrestricted access, and a much larger harvest rate of sockeye. It's telling that the seine fleet has not asked for any reduction of gillnet harvest of sockeye, yet the gillnetters, who operate an incredibly lucrative sockeye salmon and hatchery chum salmon directed fishery upstream of the seine fleet in a mixed stock corridor, and do not target pink salmon, want to curtail our pink salmon opportunity by extending the sockeye cap, based on some sort of unsubstantiated claim about run timing and climate change.

#### Proposal 157

I oppose this proposal. Given the harvest rate of sockeye in the SHA versus the escapement goals of the neighboring systems, our harvest component is insignificant. Furthermore, this proposal is simply attempting to curtail the seine fisheries harvest opportunities for both wild stock pinks and now hatchery chums. The idea that a tiny incidental harvest of sockeye may affect a future opening for wild stock pink salmon is very difficult for the seine fleet to stomach. Worse still is the possibility that incidental sockeye harvest in a pink salmon fishery will curtail a chum salmon hatchery harvest. This idea is especially hard to take when the sockeye harvest number isn't related at all to sockeye abundance. If we were to have years of large sockeye abundance, this could curtail our pink and chum opportunities due to booming sockeye abundance. This is not how we want our fisheries managed. To add insult to injury, the gillnet fleets target hatchery chum and sockeye salmon nearer the head waters of all of the major sockeye systems, and harvest a much larger percentage of the total sockeye catch than the seine fleet does, with minimal restriction on their fishery, even in times of sockeye conservation concerns. Even with mesh restrictions, the gillnet fleet catches many more sockeye in its chum/sockeye fishery than the seine fleet could ever hope to catch at its tiny Amalga harbor SHA.

#### Proposal 158

I oppose this proposal for the reasons stated regarding 156 and 157

#### Proposal 159

I oppose this proposal only because I feel that the ability for airplanes to survey the CLOSED fishing area is very valuable to the fishermen, managers, processors, and hatchery managers, and I worry that this regulation may target pilots attempting to survey closed areas near other, open THA areas.

#### Proposal 166

I support this proposal.

#### Proposal 167

I oppose this proposal. Management has the tools to open and close areas due to biological concerns and could institute these measures easily by EO if they felt it necessary.

#### Proposal 168

I oppose this proposal. Chinook concerns in our fishery are managed through non-retention and our gear type is shown to have a 90+% survival rate when salmon are released after being caught in seine nets. Furthermore most king salmon have exited this corridor due to run timing. This is another proposal by a member of the gillnet fleet attempting to curtail seine opportunity falsely stating conservation as a concern.

#### Proposal 169

I oppose this proposal. The gillnet fleet has ample opportunity to access fish in this area, and all fleets share the burden of McDonald Lake sockeye conservation.

#### Proposal 170

District 10 is historically a seine only fishing area. Gillnet fishermen in the adjacent District 11 already have plentiful and underutilized opportunity to catch pink salmon. The Taku river, which is adjacent to the D11 fishery, is one of the largest pink salmon producers in the region and gillnetters have excellent opportunity to access salmon in its watershed, which they do not utilize. It does not make sense to encroach on historical seine districts to provide an opportunity that already exists and is underutilized due to the gillnet fleet targeting the much higher valued chum and sockeye salmon instead of pinks.



Submitted By  
tom prijatel  
Submitted On  
12/27/2017 10:10:23 AM  
Affiliation  
alaskan wilderness outfitting company

Phone  
907-424-5552  
Email  
[tomprijatel@me.com](mailto:tomprijatel@me.com)  
Address  
po box 1516  
cordova, Alaska 99574

Alaskan Wilderness Outfitting Company operates a sport fishing lodge on the Tsiu River and is in oposition to Proposal 165. Moving the markers would limit the sport fishermen even more in finding a place to get away from the commercial fisherman which has historically been a 1/2 mile commercial free. The river has changed direction and is half the length and there is limited amount of areas to fish. The move would not benefit the commercial fishery due to shallow water in the area, but only take away more area from the sport fishermen. Sincerely yours, Tom Prijatel, Owner, Alaskan Wilderness Outfitting



We oppose this proposal for the following reasons:

Po Box 1403 Cordova, AK 99574

907-953-5030

1. Allocative –

**Existing regulation:**

**5 aac 30.350 Closes waters.** (a) Salmon may not be taken in the following waters:

(12)Tsiu River: upstream of ADF&G regulatory markers located approximately one-half mile downstream from Duck Camp Island.

Existing regulation that has been in place for over 30 years leaves approximately one-half mile of river closed to commercial harvesting. The proposed new regulation leaves approximately one-quarter mile of river closed to commercial harvesting.

2. Moving target-

The proposed regulation asks to use the confluence of two rivers as the starting point to measure from for these closed waters. A confluence that didn't exist 5 years ago. By the departments on submission this area is a highly volatile landscape and constantly changing. Using a landmark that may or may not be there, or its location changes from year to year, will only cause confusion and uncertainty.

\*\* See maps in **Appendix A**.

3. Demographics –

In the last 35 years the Tsiu has gone from a predominantly commercially fished river with few other users to a major sport fished river.

The conflict between the user groups has been well documented. Reducing the area available to sport fishers to get away from the boat rodeo during commercial openers will cause conflicts to arise.

\*\* Read Sheinberg Report in **Appendix E** for information on river dynamics, changes in user groups and direct city income from these user groups. Taxes and lease fees have gone up since this report and are now more than a 10 to 1 margin.

4. Change of guard –

**5 AAC 30.320. Fishing periods**

Salmon may be taken by set gillnets during the open fishing season only as follows:

(1) in the Yakataga District, from 9:00 a.m. Monday through 9:00 a.m. Thursday, except in the Tsiu River salmon may be taken only from 9:00 a.m. Monday to 9:00 a.m. Tuesday and from 9:00 a.m. Wednesday to 9:00 a.m. Thursday;

There is a new area manager that is changing the way the fishing periods are opened. In 2017, in each of the first two weeks the river was opened four days in a row. Had there been an average number of permits fishing, along with the 50% reduction of boat rodeo free area, things could have gotten ugly in a hurry.

See **Appendix B** for details on past openers.



5. Boat Rodeo and complaint letters -



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Here are a couple examples of what a Boat Rodeo is:

<https://www.youtube.com/watch?v=52Ny8sFx-nU&index=7&list=PL2F710B6AE4B80ED4>

<https://www.youtube.com/watch?v=mW4oJlkCr7E&index=22&list=PL5DF6B289E0632DB6>

<https://www.youtube.com/watch?v=40gVmIpCDKY&list=PL35D70545E196B1DC&index=8>

Please see **Appendix C** for complaint letters. In light of brevity only 10 letters are attached. There are 50 on this subject alone. There are another 50 plus on the decision to reconsider Proposal 301 with amended language found in RC 102 in 2012.

6. Proposal 301 –

See **Appendix D** for Proposal 301 in its entirety.

This proposal passed 4-3. All users and the Area Manager agreed to the amended language to place the boundary marker at the midway point of the river. This was a perfect solution since most of the commercial harvesting is on the lower half and the fish start turning blush on the upper half.

3 days later new information emerged that historically there were lots of sites on the upper river that permit holders used on occasion and worked the nets by hand.

Now, because of the geophysical change to the river those sites no longer exist, thus the reasoning for this reconsideration is no longer relevant.

7. Harassment law –

See **Appendix F** for the law in its entirety.

SOLUTIONS –

Our recommendation is to take Proposal 301 with the amended language found in RC 102 and to insert it into Proposal 165 as amended language with one change, replace Duck Camp Island with a GPS coordinate.

**From 2012:**

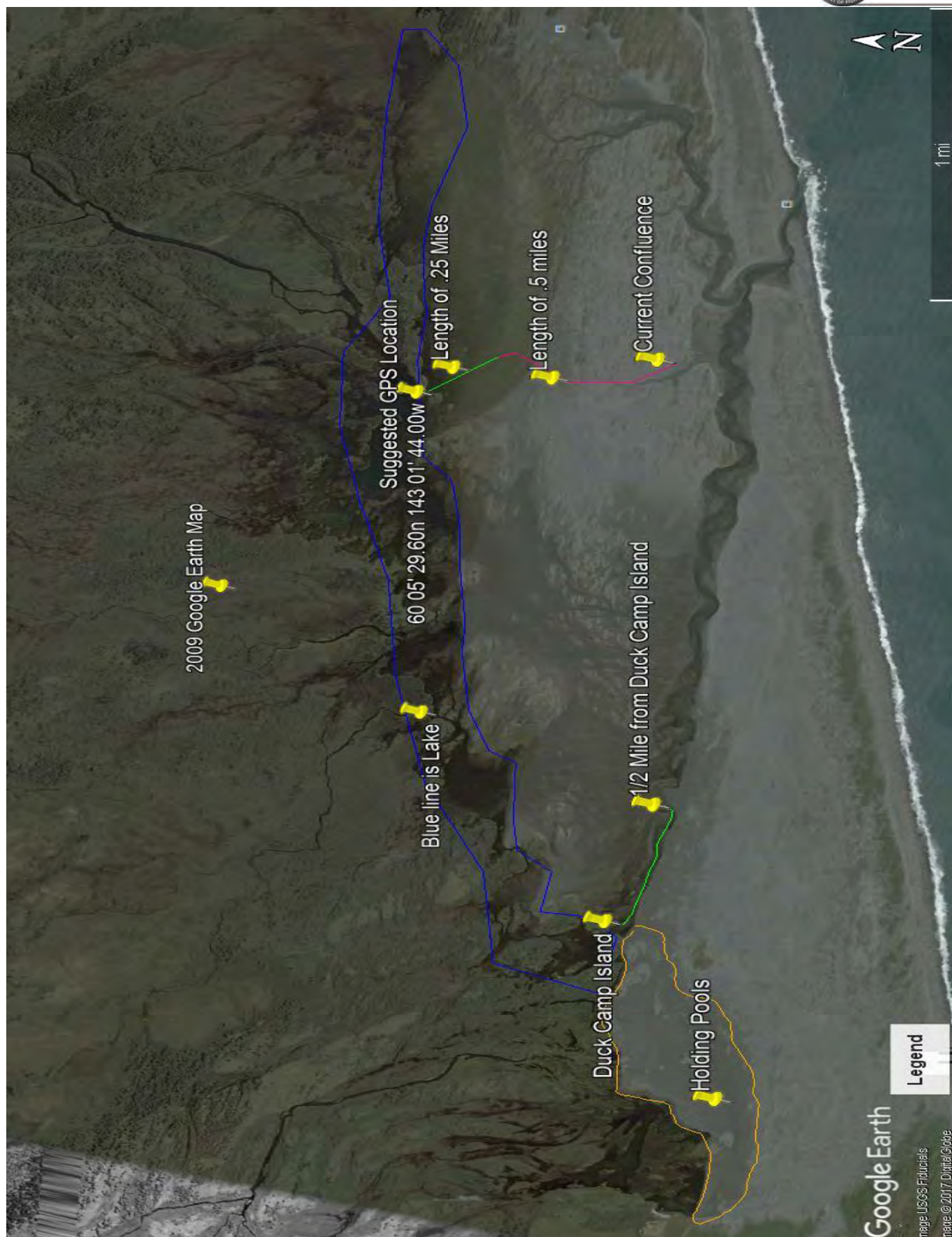
**RC102**

Substitute Language for proposal 301:

**5 AAC 30.350. Closed Waters:**

5 AAC 30.350(a)(12) is amended to read:

(12) Upstream from ADF&G regulatory markers located one half the distance between [Duck Camp Island] **GPS coordinate 60 05' 29.60N 143 01' 44.00W** and the river terminus.







## Appendix A Page 2 of 2





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## Appendix C –



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To Whom It May Concern:

November 2, 2011

During my trip to the Tsiu River Lodge with you in September of this year, I experienced an unpleasant situation on the river with the commercial fishermen. I think it is important that I relate this to you since it will affect my decision to return in the future. This was discussed with the guides at the lodge, but I thought it would be appropriate to advise you in writing since it will influence my decision to return in the future. Unless something is done to improve their conduct, I will not be returning to fish with you.

I understand the commercial fishermen had the authority to fish the river during the time I was there from September 18 thru 23. However, their action of traversing the river in front of our fishing area, running within less than 30 feet of us, and forcing us to stop fishing for fear of injuring someone in the boat was arrogant and dangerous. They showed no respect for our presence on the river and allowed us very little peace and quiet to fish only a small part of the river. They also set their nets across the river from us and often ran in circles to drive the fish into their gill nets.

I personally watched one group of commercial fishermen load more than 53 fish into a cart for processing while our party of over 6 fishermen tried to harvest our limit of fish. I personally fail to understand the position that the Alaska Game and Fish Department has taken on commercial fishing versus sport fishing. The sport fishing industry clearly brings in more revenue to the state than the commercial fishing industry. A relatively small number of commercial fishermen are awarded the privilege of reaping the greatest amount of the available resource while the sport fishermen are left with less and less. Regrettably, it has affected my decision to return in the future.

Sincerely, Vernon Broussard

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To whom it may concern,

Feb 10, 2009

Our group did not return to the Tsiu River this past fall to fish with AWOC. We fished on the Tsiu from 2001 – 2007 for 7 straight years.

On our last trip the river had a commercial fishing operation on it. The commercials were basically fishing where the sportsman had access. They were running boats at high speed up and down the river and caused an unsafe situation. As you know the river is not big. Sportsman need to be able to wade the river in order to have casting and catching opportunities. The commercial boats on a small river not only spook all the fish, but are obviously antagonistic towards sports fisherman, leading to close encounters that will ultimately result in incidents of personal injury or worse.

Frankly, I am dismayed that the State of Alaska allows this kind of situation to go unchecked or unsupervised.

Needless to say, our 2007 trip experience soured the Tsiu for us and we will not come back until this situation is resolved.

Thanks,

Tom Mike Anderson, CPA Geffen Mesher & Co., P.C. 888 SW Fifth Ave., Ste 800 Portland, OR 97204

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To Whom It May Concern,

I am a guide on the Tsiu River. I have seen years of commercial fishing and sports fishing going on side by side. The Tsiu is a short, shallow and narrow river. When the peak of fishing is underway the river becomes quite crowded. Every year the crowds seem to grow. With all the people standing in the river commercial and sports fishing the use of high-speed boats has become dangerous.

Because the Tsiu is a shallow river a flat bottom boat requires a lot of speed to keep from dragging the bottom. Boats running up and down the river weaving through people is asking for an accident. The boats must follow the channel, fisherman fish the channel, not much room for error. I have witnessed numerous close calls. Once an angler actually had to dive out of the way to avoid being run over by a boat sliding out of control around a corner!

There is very little respects given to the angler visiting Alaska's Tsiu River by the commercial fishing boats. It is bad enough that angles are run out of fishing holes by nets laid at their feet. It is just not safe or fair to run the angles off the river with a boat run in circle at high speeds in front of them. People come to Alaska for a special fishing experience, not to be run off the river by dangers that could be regulated. Let me know if I can assist in making the Tsiu a safer place to experience.

Captain Matt Williams

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Gentlemen:

September 28, 2008



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For the past 9 years, several of us fish the Tsiu River for Silver salmon during the month of September. The fishing is great and the lodging in Cordova and with the Alaska Wilderness Outfitting Company on the Tsiu are the top of any fishing and hunting areas we frequent.

The commercial fishermen on the Tsiu River have become aggressive over the years to the point that they push the sport fishermen out of the way when placing their nets. This year they were so aggressive that they would run their boats at high speed between two of us that were 20 feet apart while we are standing in 3 feet of water. There was over 100 yards of water that was available for the boats. The wake of the boats made it difficult not to fall into the river. At the same time the men in the boat waved their index fingers at the sport fishermen.

The Tsiu is one of the few clear water rivers for fly fishing that I know of in Alaska. I ask that you consider the banning of commercial fishing on the Tsiu reserving the clear water fishing for the sport fishermen.

We have made reservations to Fish the Tsiu again in September of 2009. At the age of 81 I hope to make the trip for many more years.

Yours truly

Jim Miner 2871 Tam O'Shanter Drive El Dorado Hills, CA 95762

James A. Perry 3385 Country Club Dr. S. Salem. OR 97302 November 1, 2009

To Whom It May Concern:

I am delighted to provide my comments regarding what I see is an almost total disregard by most of the gill net fishermen of the rights of sport fishermen who are sharing the river with them. First of all, I believe that there is a proper place for commercial fishing, but not in a small confined space such as the Tsiu given the manner in which such commercial fishing seems to be conducted.

I have been fishing the Tsiu for a number of years now and have been planning my trip as late in the year as I can in hopes of avoiding the gill net fishermen. The reason for this is the total disregard most of these guys have for the sports anglers.

Let me give you some examples. I have been fishing a stretch of water and have gill netters who apparently don't have boats wade through my fishing water hitting the water with oars herding the fish downstream into their net. I have had gill net fishermen in motorized dory's speed downstream through water I am fishing doing "donuts" through the hole and around their net to herd fish from the entire river into their net. I have been forced out of the area I am fishing for fear of being swamped by boats speeding in confined areas close to me.

I am responsible for bringing a number of anglers to Cordova and to the Tsiu. The economic impact which we have, not just to Alaskan Wilderness Outfitters but to the community and state is not insignificant.

If I had my preference, gill net fishing in the river should be outlawed, particularly given the shrinkage in the size of the river over the last several years. If it is not banned entirely, it should be more tightly regulated. Including the regulations which are already in effect currently, herding of fish should be banned entirely. A speed limit of 5 MPH maximum should be imposed on all motorized boats. Better yet, motors should be banned entirely.

The Tsiu is a precious resource. The economic benefit to the State of Alaska of this resource is not well served by its exploitation by a few commercial fishermen.

Frankly, if these conditions do not improve soon, I am no longer interested in coming to the area for my annual salmon fishing trip. I have discussed this with several of my companions who are in agreement. As a matter of fact, there are five individuals who have been with me on prior trips who are so turned off because of their confrontations with gill netters that they are unwilling to return.

Sincerely, James A. Perry

Feb 12, 2009

I would like to add my comments hoping you will have a chance to pass them along to the appropriate parties. We did not return to the Tsiu River Lodge last fall due to the problems I experienced with a commercial fisherman running his boat next to shore where I was fishing. He ran down stream within 10 feet of shore even though the river was 100-150 feet wide at that point. In doing so he came within one foot of running me down and then turned as he passed by and started laughing. If I were to return to Alaska and the Tsiu it would only be if I was heavily armed in order to protect myself from another occurrence.

like this. It is very unfortunate that there are very few fisheries left in Alaska that even come close to the Tsiu but the Tsiu is being ruined for the recreational fisherman by the commercial fisheries.

Bruce Bosch



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December 15, 2010

my wife and family have been fishing the Tsiu for the past 8 years. Some years have been better than others, but we always have had a good trip.

The past 2 years we have had to put up with the commercial fisherman, they have no respect for the sport fisherman. Two years ago they raced their boat out to the mouth of the river fouling up all the lines in the water.

and last year they took just about all the fishable water with their nets, so on those days the sport fisherman were froze out.

I would like to add that for us to come to Alaska to participate in your wonderful fishing, that we spend almost 5 thousand dollars per guest for air fare, lodging, license, etc.

In closing I can't see Alaska Fish and game making a small stream like the Tsiu a stream for the commercial fisherman.

Arthur and Donna Alger  
3937 Chaboya Road  
San Jose California 95147

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*Maxson-Box Stable 522 Last Chance Road Walla Walla, WA. 99362 509-529-971*

To whom it may concern;

Nov.3,2008

I would like to address the issue of the commercial fishermen and their total disregard for the rules and regulations of their occupation! Not to mention the downright rude and unethical treatment of the sport anglers!

I am afforded the luxury of taking a fishing trip with my father and husband once a year. The past 4years, we have chosen the Tsiu as our destination. (My dad has been there 7 years).

Scenario:

I am standing in the river, attempting to learn how to fly fish, it is quiet and serene, and then all hell breaks loose. Here comes these deafening boats, roaring up the river, (in an area I did not think boats could get) knocking me over in the water, and then literally dropping their nets at my feet! I was scared and in shock, to think that something like this could happen. My guide came to my rescue. She asked the boat operators what they were doing. They replied with obscenities told us to go @\*+\*#@# ourselves and threatened bodily harm. By this time my husband, father, and friend recovered from the shock and wanted to get involved. We wanted to get all the info on these bullies, so we could talk to their boss, but there was no way to identify these people. No id numbers on the boats, nets, or vehicles. Our guide told us they were commercial fishermen and suggested we report it to the warden. I did. I never received any reply.

It is my understanding that there are rules and regulations for the commercial fisherman. I do not believe they abide by any of them!

Nets were stretched completely across the river; boats were hazing the fish into the nets and dead fish being thrown back into the water. I was appalled to see this very disgusting behavior. I am sure the department of fish and wildlife will be interested to see exactly what is going on. We have video tape and pictures to verify this tragedy. These men are dangerous. We were harassed by these bullies, were blatantly threatened and do not feel safe to fish while they are on the river. I cannot believe this type of barbaric behavior is allowed.



We had a friend with us that was so traumatized by this, he refuses to ever come back. We will be giving it second thoughts also. We come to enjoy the wilderness and all it has to offer. We did not pay all that money to be in the middle of a war zone!



I know they need to make a living also, but do it honestly. There is no need for this type of utter disrespect to the sport angler. That river is big enough for everyone.

I am asking that you send someone out to watch exactly what happens.

At least make them follow the law!

Sincerely, Mickie Maxson-Box

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To whom it may concern:

January 16, 2010

I have fished for silvers on the Tsiu four times in the past twenty years. It is an expensive trip flying up to the Tsiu from San Diego, California for a week of fishing but it has always been worth the cost until my latest trip two years ago. On that trip the commercial fishermen placed nets to within a few feet of shore - while we were fly fishing along that exact shore. They then herded the salmon into the nets with their power boats to basically empty the river of silvers.

My friends and I truly enjoy everything about the Tsiu. Five of us fished in Alaska twelve years in a row but with deep regret we are no longer considering the Tsiu. We expect rain, wind, and sandstorms but not a barren river on two of our five fishing days.

Please pass on my comments to the Board of Fisheries along with your proposals for possible better means of managing this fishery.

I will look forward to hearing how this matter is resolved and hopefully being able to return to the Tsiu.

Hopefully, Donald Schoell San Diego Fly Fishers 4141 Stonebridge Lane Rancho Santa Fe, CA 9209

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To Whom It May Concern:

November 22, 2009

I am writing this letter in hopes that something can be done about the persistent and increasing problem of the commercial harvesters interfering/endangering us sport fisherman in the Tsiu river.

My friends and I have been long time annual customers of the Alaskan Wilderness Outfitting Company on the Tsiu. We date back to the years when we lived in your "tent city" prior to the establishment of your present permanent cabins in your present location. I cannot recall one year when we did not experience unpleasant encounters with the commercial harvesters. Their nets usually (if not always) would stretch across at least 80 to 90% of the width of the river. They would run their noisy high-powered boats across our fishing lines and many times come dangerously close to many of us who were already standing in the river even though we were there first prior to their arrival. During this year's visit to the Tsiu (2008), our guide spoke to the commercial fisherman who seemed to be in charge of his group reminding him we had been fishing in this location prior to their arrival and that they were running their boat dangerously close to us, and the response our guide received was "I don't care"----as a result, we had to leave that spot and went elsewhere. I might add that the above described encounter this year was not an isolated experience but also repeated in prior years.

I find it increasingly difficult to enjoy my fishing in the Tsiu because of these repetitive unpleasant encounters with the commercial harvesters and would appreciate it if you can forward my comments and experiences to the proper authorities. It seems to me that we should be able to share the river with each other without conflict. It is my hope that I can continue to return to the Tsiu annually to fully enjoy what otherwise is a very fulfilling and enjoyable fishing experience. Anything you can do to help ensure this goal would be decisive in our returning to the Tsiu.

Sincerely, Gilbert J. Hum 1771 Longhill Drive Monterey Park, CA 91754

**PROPOSAL 301 – 5 AAC 30.350. Closed Waters.**

**PROPOSED BY:** Tsiu River Coalition.

**WHAT WOULD THE PROPOSAL DO?** This proposal would limit the commercial fishery to an area of one and one-half miles located between lower markers located 500 yards upstream from the terminus of the river to markers located one and one-half miles upstream from the lower markers.

**WHAT ARE THE CURRENT REGULATIONS?** Closed waters on the Tsiu River are currently upstream of ADF&G regulatory markers located approximately one-half mile downstream of Duck Camp Island. All waters below these markers are open to commercial harvest; all waters above these markers are closed to commercial harvest.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** If adopted, this proposal would eliminate the commercial set gillnet fishery from the lower 500 yards of the river, and allow the commercial fishery from 500 yards upstream from the terminus to a point one and one-half miles above the 500 yard regulatory markers. An area that traditionally has been part of the commercial fishery would no longer be available, creating congestion in the remaining fishing area and potentially, eliminating some boats from participation. In some years, commercial harvests could be reduced because the fishery is highly weather-dependent. Sport anglers could avoid commercial harvesting activities in the waters closed to commercial harvest.

**BACKGROUND:** From Duck Camp Island to the terminus of the river, the Tsiu River can be anywhere from two and one-half to four and one-half miles long. The river flows through shifting sand in this lower stretch, there is no vegetative cover, and the river shifts course from side to side and, depending on ocean currents, can lengthen or shorten itself in a short period of time. In recent years, the river portion has been getting longer, but at any given time, the mouth of the river can break through the sand spit to the west, which lops off as much as two to two and one-half miles in its length.

Both sport and commercial user groups fish the river below the current ADF&G regulatory markers located one-half mile below Duck Camp Island. Sport fishing is open by regulation; there are no time or area restrictions. Commercial openings are opened by emergency order and usually limited to two 24-hour openings per week; a third 24-hour opening may be given as escapement counts near the upper end of the biological escapement goal (BEG) range. The commercial fishing area opened is limited to downstream of the regulatory markers.

Prior to the mid-1990s, when the nets were in the water, sport fishermen were able to access fishable waters upstream of the regulatory markers, thus avoiding conflicts with net gear. Several large holding pools in the vicinity of Duck Camp Island could, and did, provide sport fishing opportunities when commercial gear was in the lower river. Beginning in the mid-1990s and continuing to the present day, the geography has changed; those holding pools in the vicinity of Duck Camp Island have filled with sand and sport fishing opportunities above the ADF&G regulatory markers are now severely limited. Now, when the commercial gear is in the water, both user groups are essentially limited to the same area of the river below the regulatory markers. This situation has led to a number of heated confrontations between the two user groups.



The current regulatory marker placement has been in effect for over 30 years. Prior to 2010, these markers had never been moved. 2010 proved to be an exceptionally dry year on the Tsiu River. The area of the river immediately above the regulatory markers is locally referred to as "The Flats" due to the shallow nature of the river there. The Flats became so shallow in 2010 that migrating Coho salmon could not make it upriver above the markers and they started to hold in the holes immediately below the markers. As the season progressed, upwards of 15,000 fish were seen holding below the markers, waiting for higher water levels. These fish had turned color and reached the point of not being fit for commercial sale and were of no value to the market. They did, however, have considerable value as potential escapement. Prior to the initial commercial opening, in order to protect those fish, the markers were moved approximately two and one-half miles downstream. This action allowed the commercial fishery to take place in the lower three-quarters of a mile of the river without allowing any harvest on the fish trapped below the markers. Late in September, the weather pattern changed and with the first rains, those fish moved to the spawning grounds. The marker movement was done out of biological necessity to protect those fish, but it had two outcomes. One, those fish were protected and eventually found their way upstream and, two, sport fishermen found room above the net fishery to pursue angling activity without interference from the nets.

**DEPARTMENT COMMENTS:** The department is NEUTRAL on this proposal. The proposed movement of the Tsiu River regulatory marker is allocative.

**COST ANALYSIS:** Approval of this proposal is not expected to result in an additional direct cost for a private person to participate in this fishery.

# TSIU RIVER: LAND AND FISHERIES MANAGEMENT

## EXECUTIVE SUMMARY

*Prepared for*

# City and Borough of Yakutat



*Prepared by*

**Sheinberg Associates**

*with assistance from*

**Alaska Map Company**

# FEBRUARY 2009

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## Introduction

In the early 2000s the City and Borough of Yakutat (CBY) acquired approximately 21,500 acres of land west of Icy Bay area from the State of Alaska as part of its municipal entitlement. This included the mouth and first mile or so of several salmon bearing streams and rivers including the (from east to west) Kiklukh, Tashlich, Seal, Tsiu, Tsivat, Chiuki, Kaliakh and Duktoth Rivers. City and Borough of Yakutat land is colored light pink on Figure 1 and accounts for approximately 1.25% of the total land base from Icy Bay west to Cape Suckling. The Tsiu River has the most productive Coho salmon run in the area, but most of these rivers have Coho, chum, sockeye and pink salmon runs as well as cutthroat and rainbow trout, steelhead and dolly varden.

State leases on this new CBY land were transferred from the State to the borough in about 2005, including leases for four sport fishing lodges in the Tsiu area, a commercially used airstrip and fish buying station, and some personal use (setnet) cabin leases. In the last few years there have been several requests to lease CBY land in this area for sport fish lodges. At the same time sport and commercial fisherman and lodge owners are complaining that conditions are already overcrowded and that there is conflict among user groups.

The fishable portion of the popular Tsiu River is quite small. It is, depending on weather and sea conditions, only about 3-3.5 miles long, 20 to 60 feet wide(though it can be as wide as 150 feet depending on conditions sometimes), and 2 to 3 feet deep. Above the fishable part of the river is a “lake system” that is a braided swampy area approximately 5 to 7 miles wide with no clear channel to funnel fish in a concentrated way (so not good for fishing).

Both commercial and sport fishers target the deeper (3-4 feet) holes in the Tsiu River where fish congregate. Tension between these user groups has been escalating during the 6-8 week Coho



fishing season in August to early October with reports of deliberate acts of mischief and antagonistic between users. Lack of regular enforcement in the area has also resulted in allegations of illegal fishing acts.

In December 2007 the CBY Assembly declared a moratorium on issuing any borough land use or business permits in this area until the situation could be reviewed. The CBY hired Sheinberg Associates, a Juneau-based community planning firm, to assist them in defining the land use and fishery situation in the area so that the borough planning commission and Assembly could be better positioned to make decisions on land lease and use issues and requests.

To accomplish this work Sheinberg Associates, with team member Alaska Map Company:

1. Researched and gathered fishery data;
2. Researched and gathered plat, survey and lease ownership data from the State Records Office to construct lodge and infrastructure as-builts;
3. Acquired high resolution imagery compatible with the Borough GIS system;
4. Travelled to the Tsiu River in September 2008 to observe the situation, conduct interviews and accurately document and map infrastructure the area for entry into Borough GIS with precision GPS equipment (Figure 2)<sup>1</sup>; and
5. Conducted over 30 interviews with commercial setnetters; sports anglers; Yakutat Seafoods LLC managers; sport fishing guides, employees and lodge owners; Alaska Department of Fish and Game (ADF&G) sport and commercial fishery biologists; Alaska State Troopers; air carriers that provide fly-in fish services, etc.

This investigation shows that conflicts on the Tsiu are not biological or sustainability issues; they are fishery, land and behavior management issues.

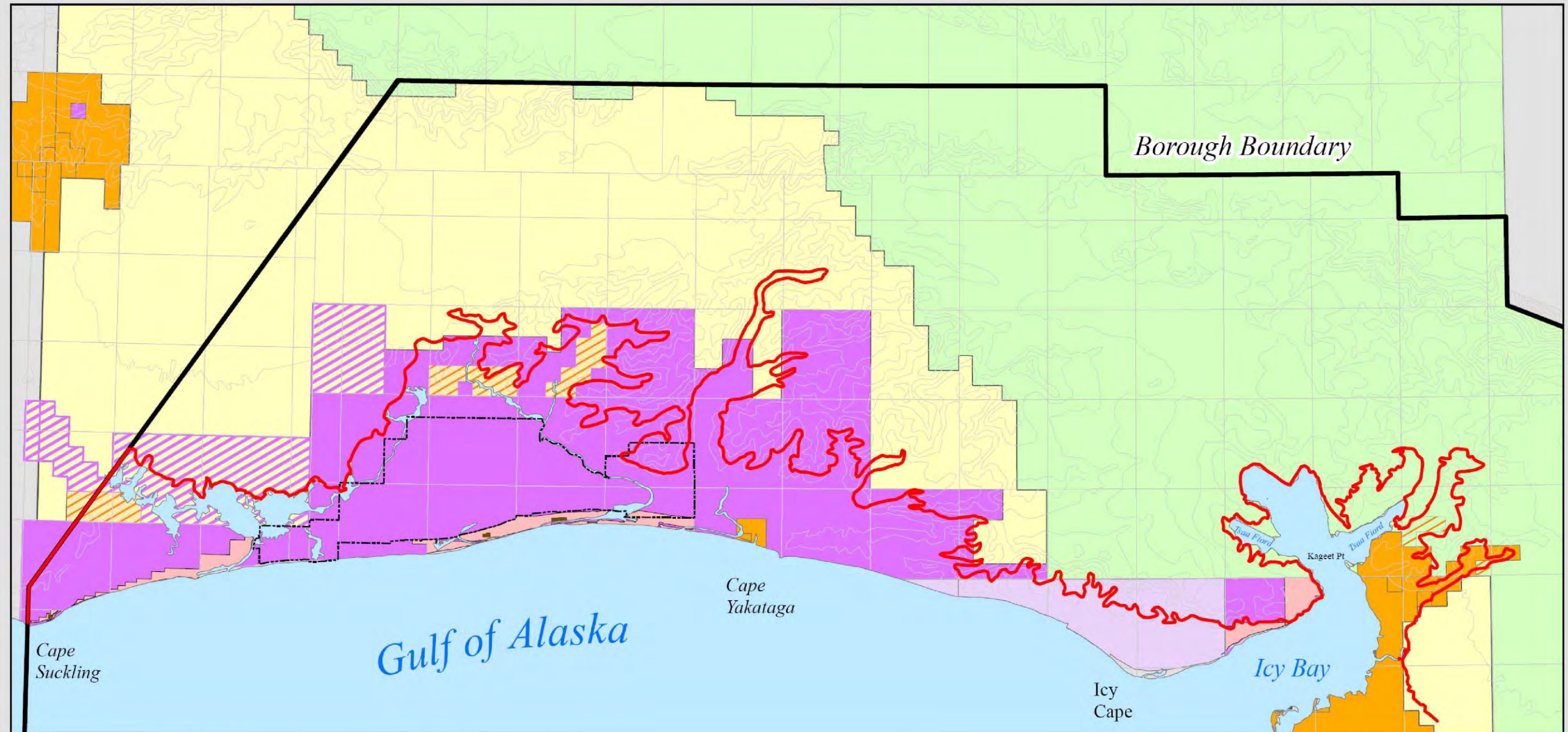
ADF&G area biologists believe there are adequate numbers of Coho to support both fisheries. The Tsiu River is home to a productive Coho run that has averaged 56,000 fish annually between 1960 and 2008, with a range from lows of 6,157 and 9,800 fish in 1969 and 2004 respectively, to highs of 119,160 and 118,813 fish in 1994 and 1992 respectively. Counting 10,000 Coho is the lower end for escapement; ADF&G biologists believe this level is virtually always achieved - even years when fewer fish were documented (when there is no commercial fishery ADF&G does not send an airplane the area to count). Coho salmon run during a 6-8 week window in August to early October. Much of the spawning and rearing habitat is protected in the Yakataga State Game Refuge, helping to ensure the run's long term sustainability. Subsistence, commercial and sport fishers all utilize Tsiu River Coho.

<sup>1</sup>

Thanks are due to ADF&G for use of its cabin and ATV, Greg Dierick for logistical support to enable this trip, Bill Lucey for logistical support and participating in the field trip along with Alaska Map Company's Gary Greenberg.



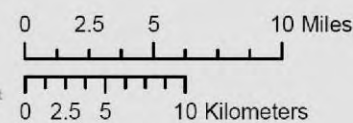
# Tsiu River Area - Land/Fisheries Uses and Management



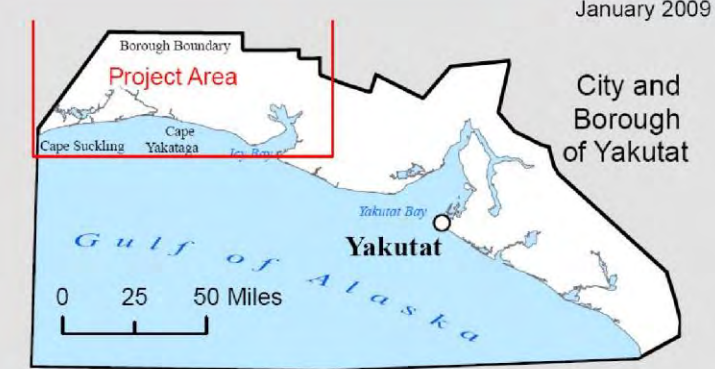
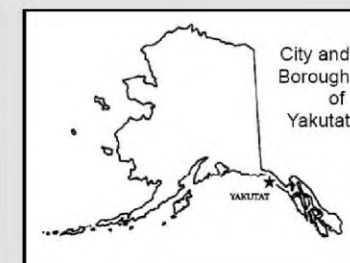
## Land Status Map

Source Data: State of Alaska Land Information System  
 Drawn By: GAG  
 Datum: Nad 83  
 Projection: Alaska State Plane Zone 2

Disclaimer: This map was compiled for the City and Borough of Yakutat by Sheinberg Associates and Alaska Map Company LLC using the best available sources. This map is for illustration purposes only, data may have errors and discrepancies.



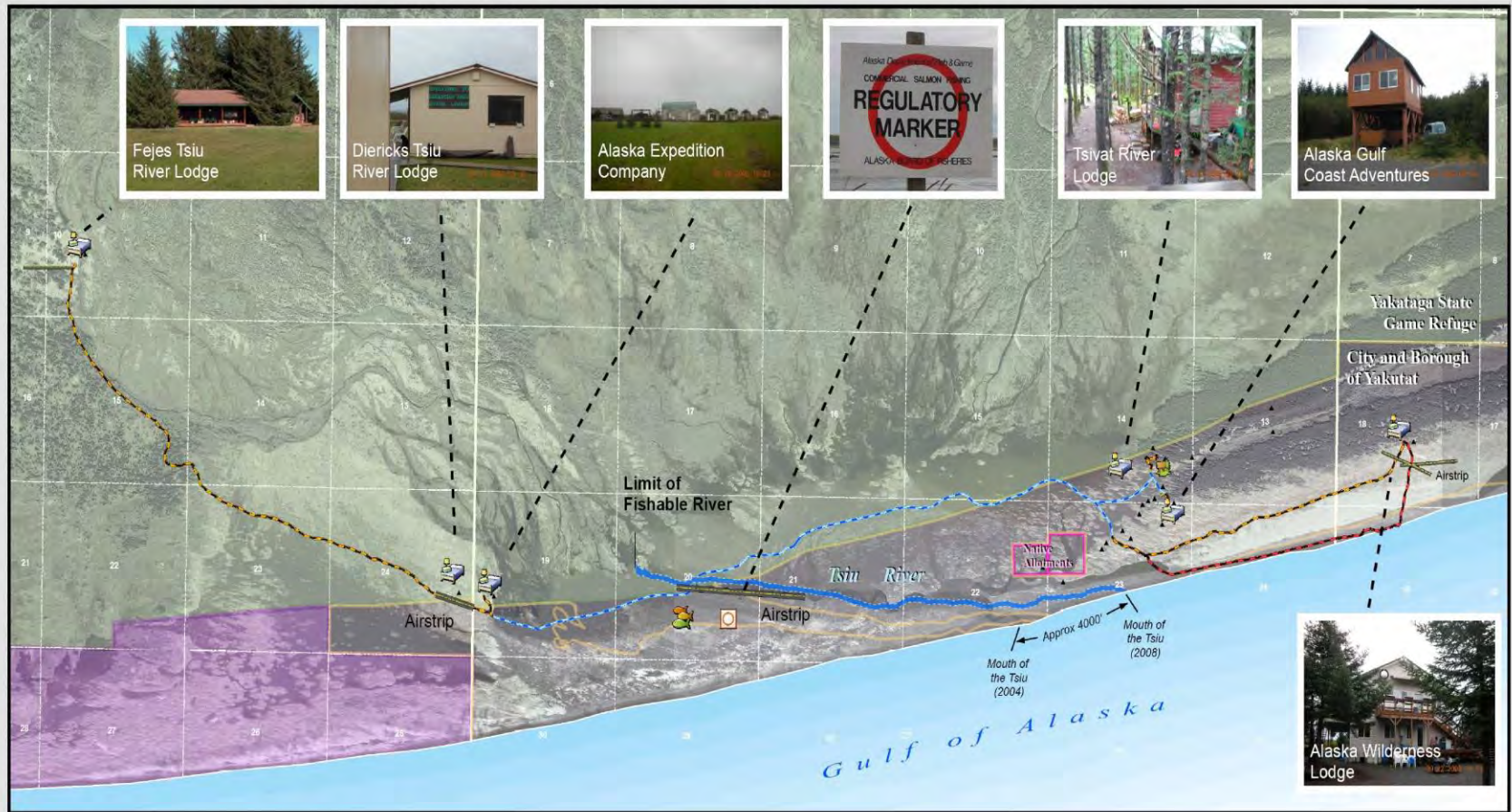
### Land Status



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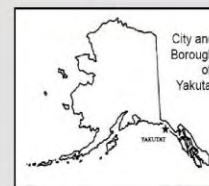
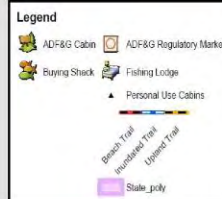
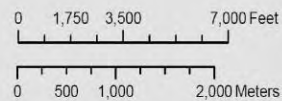
# Tsiu River Area - Land/Fisheries Uses and Management



## Infrastructure Map

Source Data: Digital Globe Quickbird Imagery August 2004  
 Locations of trails, structures and river meander were collected using mapping grade trimble GPS equipment September 2008  
 Drawn By: GAG  
 Datum: Nad 83  
 Projection: Alaska State Plane Zone 2

Disclaimer: This map was compiled for the City and Borough of Yakutat by Sheinberg Associates and Alaska Map Company LLC using the best available sources. This map is for illustration purposes only, data may have errors and discrepancies.



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Coho salmon from the Tsiu have a reputation for quality including their excellent roe byproduct. Fish are transported by airplane to market; Yakutat Seafoods (YS) out of Yakutat is currently the sole commercial buyer. YS flies DC-3s two-four times/day during the season, weather permitting, to a small buying station near the Tsiu River lagoon to transport these set gillnet caught fish to Yakutat. In a good year there are generally about 10-12, 24-hour openings during the season, each lasting approximately 24 hours. When this schedule is followed relations between sport and commercial fishers are less stressful; when weather interferes and openings become less predictable tension rises.

TABLE 1 Commercial Fishing Effort, Tsiu River		
YEARS	Average No. Permits	Average Commercial Catch (No. Fish)
1960-1977	9	14,090
1978-2001	24	47,354
2002-2004	0	0
2005-2008	11	30,671
<i>Source: ADF&amp;G Commercial Fisheries Division</i>		

The number of commercial set gillnetters fishing the Tsiu has decreased over time (Table 1). The heyday of the commercial effort was from 1978 through 2001. The fishery was not utilized commercially in 2002-2004 due to low salmon prices. Since 2005 there have been fewer commercial fishers on the river, who collectively are harvesting an average of two-thirds the number of fish caught in the big years prior to 2002. Almost all the commercial setnetters are Yakutat residents or those with family in Yakutat. This activity is considered traditional; commercial and subsistence catch of Tsiu River fish has been occurring for generations. At one time there were about 40 setnet camps and cabins in the area used by local families. About half are now dilapidated and no longer usable; most are on borough land with a few on the Bremner Native Allotment (Figure 2).

Commercially harvested Tsiu cohosh generate both local 1% salmon tax revenue to the borough and also state raw fish tax revenue to the borough. The relative amount of fish tax that can be attributed to Tsiu River cohosh varies year to year based on the relative strength of this run versus other Yakutat area salmon fisheries and the price. YS estimates that recently approximately 5-8% of Yakutat's 1% local fish tax can be attributed to Tsiu cohosh. In FY 2008 the 1% Yakutat salmon sales and use tax generated just under \$33,700, thus Tsiu cohosh would account for approximately \$2,000-\$3,000 in local tax revenue. Half of the State raw fish tax collected from YS is shared by the State with the CBY. In Fiscal Year 2008 this was just over \$200,000. If the same ratio of value is true for State fish tax as the Yakutat 1% fish tax this would attribute \$10-\$16,000 to Tsiu cohosh. In addition, YS employs approximately 60 during the height of the season at its Yakutat processing plant (7 were reported to be local residents in 2008) as well as generating local sales at grocery and other stores. In addition, one Yakutat based air carrier generates significant revenue transporting fish for Yakutat Seafoods.



## Sport Fishing

Sport fishing at the Tsiu has been occurring since the early 1980s. Alaska Wilderness Outfitting started as a tent camp on Duck Camp Island at the northwest end of the lake. Data from ADF&G sport fish license surveys shows that since 1996 the number of angler's sport fishing the Tsiu River has ranged from a low of 187 in 1998 to a high of 910 in 2003 (Table 2). The second highest number of sport fishers was in 2007, with 877 anglers who fished an average of 3.5 days on the river, catching 12,000 Coho and harvesting 2,750 fish.

Sport fishers either stay at one of six lodges in the Tsiu River area when they fish the area or fly-in and out on the same day with small air carriers out of Cordova, Yakutat or Anchorage. Several estimated that when the weather is good about 15% of those fishing the river are fly-in day-fishers. The six lodges (from east to west) are:

1. Sam Fejes Tsiu River Lodge
2. Greg Dierick's Tsiu River Lodge
3. Charles Allen, Alaska Expedition Company Driftwood Lodge on the Tsiu River
4. Harold Perantie, Tsivat River Lodge
5. Dennis Meyer, Alaska Gulf Coast Adventures (this used to be George Davis's Three Rivers Camp in the Kiklukh and Tsiu areas, but now George Davis is in Icy Bay only)
6. Tom Prijatel, Alaska Wilderness Outfitting Company's Adventure Lodge.

Aerial photos with surveys for all lodges can be found in Appendix A of the full report.

The six lodges have about a 100-bed capacity. In 2007, all lodges reported operating revenue subject to borough tax. In 2008, five lodges were open (Tsivat River apparently operated the first half of the year only, Alaska Gulf Coast Adventures did not operate).

In 2007, tax revenue generated from sport fishing related activity in the Tsiu area was just over

\$65,500, just under 4% of all CBY tax revenue. Sport fishing lodge leases also brought in \$36,000 in revenue to the Borough in 2007. In addition, two Yakutat-based air carriers generate sales from Tsiu-bound sport fishing customers, and one local resident is a lodge owner.

## Conflicts

Conflicts on the Tsiu are not biological or sustainability issues; they are fishery, land and behavior management issues.

TABLE 2 Sport Fishing Effort, Tsiu River		
Year	No. Anglers	No. Days Fished
1996	328	773
1997	506	1366
1998	187	788
1999	494	1418
2000	529	1576
2001	397	1307
2002	519	1883
2003	910	2891
2004	683	2060
2005	610	1771
2006	514	1904
2007	877	3090
12 year average	546	1736
Source: ADF&G Sport Fish Division		





Interviews with 29 individuals who either sport or commercial fish or guide along the Tsiu River were conducted in September- December 2008; most interviews occurred at the Tsiu. Of the 24 who offered a rating of their experience, over half (58 percent) call it good, 9 say poor (33 percent) and 2 rate it as excellent. However, 22 (91 percent) say the experience has changed and there is now more conflict. Differences and perceived conflicts are described as follows: "More aggressive commercial fisherman"

"Too many commercial fishermen now"

"There are a lot more sport fisherman now"

"Fishing area has shrunk by 70 percent due to river and mouth changes and rain"

"River is much shorter now"

"River is more crowded with commercial fisherman"

"More nets in the river"

"More sport fisherman now"

"Too many sport fisherman"

"Commercial and sport fishers are antagonizing each other"

"Don't like the fish herding"

"Don't like clearing the whole river of fish at once as is done now"

"Too many motors and noise, spent a lot of money to get here to get away from this" "Some guides have poor attitude"

"Guide is telling us to get out"

Other factors contributing to rising tension are that: ⑤ When there was no commercial fishing from 2002-2004 sport fishers got used to having the river to themselves.

- ⑤ The high rainfall the last few years has enlarged the lake and shortened the already small river.
- ⑤ The lack of an enforcement presence in the area during the season contributes to problems and 'attitudes' brew unchecked and tension rises - deliberate acts of antagonism are now occurring.
- ⑤ There were more anglers than average in 2007 and the run was less than average, that for the last 5-6 years the Coho run strength was below average.

Lodge owners say that business has been declining since 2005; that they are now running at 60-80% capacity. The high number of anglers fishing the river in 2007 likely reflects increased fly in fisher numbers. Some suggest that 50-60 sport fishers on the river feels acceptable but when there are 100 anglers it feels like combat.

Problems center on competition for the river's relatively few fishing spots; the manner in which commercial fishing is occurring; certain sport fish guides fostering antagonist behavior to commercial fisherman who then retaliate causing ever-escalating tension; and the lack of an enforcement presence in the area during the short but intense harvest.

Sport clients are looking for a remote experience and do not want to be fishing in the middle of a commercial fishery. Commercial fishermen want to protect their access to the fish and it is difficult to accommodate fast paced commercial operations around individual sport fishermen. There is little enforcement of regulations in either fishery since there is no Alaska State Trooper, police, or Village Public Safety Officer presence and only one ADF&G employee on the ground, whose purpose is to monitor the run and escapement not enforce regulations or mediate user group conflicts.



## ***Optional Solutions***

Many individuals interviewed for this report noted that sport, commercial and subsistence users did not have a problem sharing harvest of the Tsiu River Coho resource in the past. Tension and conflict heightened in 2007 and 2008 and virtually everyone interviewed expressed an interest in finding ways to de-escalate tension.

Many different solutions to reduce conflict were offered during interviews conducted as part of this project.

One of this report's primary recommendations is to assemble a group of Tsiu River users and a skilled facilitator to help users reach agreement on a package of solutions to reduce tension and conflict. The Alaska Board of Game, Federal Subsistence Board, Yukon River Panel and other regulatory boards have used facilitated group meetings to empower users to solve conflicts and report back to the regulatory body with a package of solutions.

In this case the City and Borough of Yakutat, the Alaska Board of Fisheries, Yakutat Seafoods, lodges owners, sport and commercial fishers and guides, air transporters, and ADF&G fishery managers all have a stake in resolving conflict in the Tsiu River.

Suggested solutions take many different forms; they are presented below organized in four categories: land management, permitting and tax policy (CBY purview), behavior management (all users responsible), fishery management (ADF&G and Alaska Board of Fisheries purview) and other.

## **Land Management, Permitting and Tax Policy Options**

1. When there are over 70 or so anglers the river is too congested and feels like combat. Protect the experience that sport fishers are paying top dollar for and protect the investment that current lodge owners have made by prohibiting issuance of leases or sale of land for new lodges in the Tsiu River area.
2. Encourage sport fishing and related lodges to spread-out and use the area from Cape Suckling to the Seal River, and from the east side of the Kaliakh River to Icy Bay by making land available to lease in these areas and approving development permits. (Others have suggested not leasing land anywhere in the western borough until a land use, mapping and management intent has been updated.)



3. Tax policy, permitting and enforcement should be equitable among types of landowners and users. Sport fish lodges are paying property taxes whereas many commercial fishing cabin owners are not (it appears that four are on the CBY property tax roll).
4. Enforce CBY Code Title 11 provisions regarding nuisances and litter in order to clean up the appearance of the area, reduce erosion and decay of material into fish bearing waters.
5. Levy financial penalties for rule violations.

## Behavior Management Options

6. Provide either a CBY police or VPSO officer or a State Trooper on site for periodic inspections and visits, or for the 6-8 week season. An enforcement presence would curtail illegal fishing activity and defuse bad behavior. Levy financial penalties for rule violations.
7. Create a behavior/ etiquette guide that lodge owners, guides, all fishers, and air transporters must read and sign. Managing people's expectations about what they will encounter on the fishing grounds will go a long way to reduce conflict. For example, one fishing lodge owner and his guides tells clients that they will encounter commercial fisherman out on the river and asks them to understand that this is how these 10 individuals make their living, and that it may interfere with sport fishing for a few hours but to be respectful and find ways to share the river. Another example is one commercial fisher interviewed always makes a point of talking to the sport fishers in the area before he begins his operation to let them know what he will be doing and that it will be noisy and he'll be running his boat for the next hour and herding fish, but to please understand that he too is trying to feed his family and make a living. Both the sport fishing lodge owner and guides and the commercial fisherman say that just talking to each other has by and large eliminated their conflicts.
8. Promote a day of bird and wildlife photography, trout fishing in clear water streams feeding the Chiuki, and other activities to diversify and spread out fishing trips to Tsiu.
9. Manage expectations through marketing. Market a premier fishing, but not a complete wilderness, experience. Let clients know commercial fishing may occur during part of their visit.

## Fisheries Management Options

Different users favor and oppose various fishery management options. All options listed here were suggested by various parties interviewed; there are surely others as well. Inclusion of any of these options in a solution package would depend upon consensus of all user groups and must be within the management authority given to local ADF&G managers by the Alaska Board of Fisheries.

10. Move the ADF&G Regulatory Marker (above which no commercial fishing is allowed) a  $\frac{1}{4}$  to  $\frac{1}{2}$  mile farther downstream to give sport fishers more room and allow access to fishing holes.





11. Prohibit sport fishing below the marker when commercial fishing is going on.
12. When weather changes the 24 on/off openings, allow sport fishing only from 5-10am, both to fish from 10 am to 5:00 pm, then commercial fishing only from 5 pm to 5 am.
13. Divide fishing times to make sport only and commercial only fishing periods.
14. Allow sport fishing only from the mouth to a ¼ mile up river, from 7am to 7 pm.
15. Eliminate use of motors for commercial fishing, make it a net-only fishery. The same amount of fish (and dollar value) would still be caught it would just take a longer.
16. Allow fishing boats to herd fish only 500 feet from net rather than 1/8 to 1/4 mile from net as they sometimes do now.

## **Other Options**

17. Limit the number of fly-in fishers that can fish the Tsiu River per day. (Implementing this would involve work with transporter licensing and regulations.)

## ***Recommendations***

1. Assemble a group of Tsiu River users and a skilled facilitator to discuss concerns and help users reach agreement on a package of solutions to reduce tension and conflict. The Alaska Board of Game, Federal Subsistence Board, Yukon River Panel and other regulatory boards have used facilitated groups such as this to address conflict among user groups. When parties impacted help craft solutions the likelihood of a successful outcome is much higher.
2. No new sport fish lodge leases for Tsiu River; practically/ geographically defined as area between Seal River and Kaliakh River. (Leases for other uses may be permissible; better marketing of lodges in other parts of the western borough could help relieve pressure in the area).



**Sec. 16.05.790. Obstruction or hindrance of lawful hunting, fishing, trapping, or viewing of fish or game.**

(a) Except as provided in (e) of this section, a person may not intentionally obstruct or hinder another person's lawful hunting, fishing, trapping, or viewing of fish or game by

(1) placing one's self in a location in which human presence may alter the

(A) behavior of the fish or game that another person is attempting to take or view; or

(B) feasibility of taking or viewing fish or game by another person; or

(2) creating a visual, aural, olfactory, or physical stimulus in order to alter the behavior of the fish or game that another person is attempting to take or view.

(b) For purposes of (a) of this section, "lawful" means

(1) in compliance with

(A) this title, regulations adopted under this title, or applicable federal statutes and regulations;

(B) the Marine Mammal Protection Act (P.L. 92-522) or the Endangered Species Act (P.L. 93-205); or

(C) federal regulations adopted under 16 U.S.C. 3111 - 3126 relating to subsistence hunting, fishing, or trapping on federal land; and

(2) with the permission of the private landowner if the hunting, fishing, trapping, or viewing of fish or game occurs on private land.

(c) Notwithstanding AS 12.25, only a peace officer may arrest a person for violating this section. A peace officer who has probable cause to believe that a person has violated this section may arrest or cite the person or order the person to desist.

(d) In a prosecution under this section, it is an affirmative defense that the person was lawfully entitled to obstruct or hinder the hunting, fishing, trapping, or viewing of fish or game.

(e) This section does not apply to

(1) lawful competitive practices among persons engaged in lawful hunting, fishing, or trapping;

(2) actions taken on private property with the consent of the owner; or

(3) the obstruction or hindrance of the viewing of fish or game by a person actively engaged in lawful fishing, hunting, or trapping.

(f) A person who violates this section is guilty of a misdemeanor and is punishable by a fine of not more than \$500 or imprisonment for not more than 30 days, or both.

Sec. 16.05.791. Civil remedies for violation of [AS 16.05.790](#) .

(a) A person aggrieved by conduct or threatened conduct in violation of [AS 16.05.790](#) may petition a superior court to enjoin the respondent from engaging in the conduct.

(b) A person aggrieved by a violation of [AS 16.05.790](#) is entitled to recover general damages and special damages, including license and permit fees, travel costs, guide-outfitting fees, costs for special equipment and supplies, and other related expenses.

(c) A court may award punitive damages in addition to the damages set out in (b) of this section.



Submitted By  
Ty Vandergriff  
Submitted On  
12/28/2017 2:41:15 PM  
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To whom it may concern

As a 42 year resident of Alaska, fisherman and charter captain, the proposed closures of the area surrounding Ketchikan for all salmon fishing will all but decimate my, and many others', fishing related businesses. A FAR better approach would be to better regulate the commercial net fishing in and around Ketchikan. Discontinuing the use of seine and gill nets in the bays of our few hatcheries and spawning rivers would be a great step in the right direction for sustaining our salmon fishery. If the new regulations of sportfishing is necessary I would strongly suggest not to close these areas to ALL salmon fishing, instead institute limit reductions for specific species for certain times of the year.

Ty Vandergriff



# **UNITED SOUTHEAST ALASKA GILLNETTERS**

**Box 2196, Petersburg AK 99833 \* (253) 237-3099 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)**

December 28, 2017

Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

Sent via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov) and online form

Dear Chairman Jensen and Board of Fisheries Members:

RE: Stock Status and Action Plan for the Chilkat and King Salmon Rivers

Our organization would like to offer the Board of Fisheries these considerations in their decision as how to best address the current stock of concern status, and minimize our impact on these chinook stocks, while minimizing the economic impacts in our most lucrative fishing areas.

On page 2 of the action plan, under STOCK ASSESSMENT BACKGROUND for the Chilkat River, the last sentence of the first paragraph states “Estimates of escapement are germane to large fish (age 1.3 and older)...” In data accompanying the plan on page 30, table 1, titled “Chilkat River large king salmon escapements of greater or equal to 1.2 fish 2007-2017”, we see that the definition of age class has changed. Whether this is a typo, or new information has led the department to include 1.2 is unclear at this time. We DO know that the data set being used in the table includes 1.2s. Including 1.2s does broaden the database but for only one user group. The gillnet fishery is the only user group represented in this particular data that is not precluded by regulation to take any size of king salmon. Seine, troll and sport fish are all required to release any king salmon less than 28 inches. Very few, if any, age 1.2 fish will reach the 28” required to be landed in these fisheries. Many 1.3 age fish also do not reach the size that would allow retention. We aren’t denying the veracity of the data, only that it could focus the impact on these stocks on our fleet.

It is important to consider that the data doesn’t address the fact that there is a hook and release mortality associated with both the troll and sport fisheries. There has been an increase in troll



effort over the last several years during the winter and spring hatchery access fisheries due to king salmon being a highly sought commodity during those months. The sport fishery has seen unmitigated growth in effort by residents, unguided non-residents and charter. We realize that there is no data available of how many undersized fish are released for either user group but hook mortality and the percentage associated with it is something to consider.

In the course of implementing these action plans, the seine fleet will always show a zero in their catch. With no retention of any king outside a THA, and a zero always extrapolating to zero insures this. Zero retention does not necessarily mean zero impact. A southeast seine is 250 fathoms long and some are 20 fathoms deep. They will and do catch kings in the prosecution of their fishery. Whether those non-retained kings are gently pushed over the cork line or grabbed by the tail and flung over the side when they come aboard as part of a 15,000 pound bag of pinks before they slip into the hold is debatable. What isn't is that there is a probable mortality factor there as well.

It isn't our intent to drag other users through the mud, only to point out that outside this data set provided by the department, those other than gillnetters are in all probability touching these fish.

In 2008-2017, the gillnet fleet in district 115 landed 61 individual Chilkat chinook tags. Nine of those fish were larger than the 28" required for other users to land; the rest were under the minimum size. What would the data look like if our gear group had zero retention or even just a minimum size limit? It would likely show we are having virtually no impact on these fish.

Please also note that the data in table one is not exclusive to district 115. Two of these tag recoveries were in district 108; three were in district 111, which shows the wide range of these fish. The Chilkat River is somewhere around 160 miles from the Stikine River, district 108, and in that 160 miles, there occurs extensive sport and commercial fisheries, particularly seine and troll, that again, are in all probability interacting with these chinook on a certain level, regardless of what this data shows, due to harvest preclusions due to size.

In 2017, even with the measures implemented to protect the Chilkat king return, our fleet caught more kings than expected. This is likely due to the sport and troll fisheries' restrictions that were directed to the same objective. In an effort to be proactive in addressing this, we would recommend to the board "Option A-Status Quo", for 2018, but adding night closures for the first 4 weeks in all of districts 11 and 15. We would also entertain the conversation of extending those weeks if the department felt it necessary. The tag recovery data and catch data from 2017 for kings shows that the bulk of the Chilkat fish, as well as kings in general, are taken in these weeks. Members report from personal observations that most small kings are caught in the dark. Diurnal vertical migration is a common behavioral characteristic of small feeder king salmon. We realize that there would be an associated loss of time initially, but our hope would be that if



our catches of kings were minimized by these dark time stand-downs, we could possibly get more time in the form of extensions in season, if warranted.

We have no recommendations for the other user groups included in these proposed action plans. USAG's objective in these comments is to clarify some data for the board and to offer what we feel should make a difference in addressing the current state of both of these rivers while allowing us our livelihood.

Sincerely,

A handwritten signature in black ink, appearing to read "Max Worhatch".

Max Worhatch  
President

- - -

The mission of United Southeast Alaska Gillnetters is to protect, serve and enhance the gillnet fleet of Southeast Alaska. We represent the interests of 473 salmon gillnet permit holders and their families.





# **UNITED SOUTHEAST ALASKA GILLNETTERS**

**Box 2196, Petersburg AK 99833 \* (253) 237-3099 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)**

December 28, 2017

Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

Sent via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov) and online form

Dear Chairman Jensen and Board of Fisheries Members:

RE: McDonald Lake Sockeye Salmon Stock Status and Action Plan, 2018

District 106 is an important area to the gillnet fleet, particularly in the time frame when McDonald Lake sockeye migration occurs. Fishermen based in Petersburg, Wrangell, and in various locations on Prince of Wales Island are generally the principal users of this opportunity. The last time McDonald Lake had a stock of concern status, the immediate result appeared to have taken care of the problem, as we had three years in a row of good returns that allowed McDonald Lake sockeye to be removed from stock of concern status.

Apparently, it wasn't enough. Putting fish into the system through restrictive management did not equate into good returns. It appears the catch rates have remained stable and in the last couple seasons, even if a seine or gillnet had not been set in the corridors in stat weeks 29-32, we would still have not seen adequate returns for escapement. There appears to be no systemic problem with spawning or rearing habitat; there is no out smolt migration for this system. In conversations with the department, we have learned that in their opinion it would be difficult to do because of the particular characteristics of this system. They use a sonar and trawl combination to assess fry abundance in the lake.

The catch data associated with McDonald Lake is pretty scant and it involves two types, coded wire tag (CWT) and genetic stock index (GSI). The CWT was taken in 1985 and 1989-91. The GSI was taken in 2014-2017. The time between the data sets is huge and both are very short. Our assumption is that GSI will continue to brighten this dim picture to help us better understand the migration corridors and where these fish are caught. We did find it curious that the largest



percentage of catch for the seine fleet came from district 104 and it was not listed as having any restrictions associated with the action plans.

Our recommendation would be Option B. As noted, this management plan led to three years of escapement while in place. We would be cautiously optimistic but moving forward we feel it is least impactful to the fleets and has been proven.

Sincerely,

A handwritten signature in black ink, appearing to read "Max Worhatch".

Max Worhatch  
President

- - -

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Submitted By  
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Submitted On  
12/28/2017 3:52:04 PM  
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~~December 28, 2017

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526  
Sent via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov) and online form

Dear Chairman Jensen and Board of Fisheries Members:

RE: BOF Proposal Comments

United Southeast Alaska Gillnetters (USAG) is an association of 175 business owners, most of whom catch salmon by drift gillnetting throughout Southeast Alaska. USAG is a southeast wide organization that seeks to represent the common interests of all 473 drift permit holders.

We appreciate participating in this process. Please consider our comments to the selected salmon proposals below. Our board and staff are available should you have any questions.

Proposal 132. Amend sport king salmon regulations in Districts 11, 12, 14 and 15 based on the Taku River king salmon preseason escapement estimate.

OPPOSE: USAG supports the department's king salmon conservation measures. If enacted, this proposal would inhibit local Fish and Game managers' ability to be flexible and respond to in-season king salmon runs and other associated factors. The Board of Fisheries will be considering action plans aimed at the issues brought forth in this proposal. We feel that this will be the proper venue regarding management decisions.

Proposal 133. Management of the spring salmon troll fisheries. Base duration of commercial troll and gillnet spring openings on preseason king salmon abundance projections.

OPPOSE: This proposal would change current management. USAG believes the department has the tools available (time and area) to manage the gillnet fleet to curtail gillnet harvest of king salmon in Districts 8, 11, and 15. The Board of Fisheries will be considering action plans aimed at the issues brought forth in this proposal. We feel that this will be the proper venue regarding management decisions.

Proposal 137. Increase the regional resident king salmon possession limit when the Southeast Alaska Area preseason king salmon abundance index is greater than 2.0.

OPPOSE: It is not prudent to increase the bag limit on a fully utilized fish that is going through a period of low ocean survivals. The Board of Fisheries will be considering action plans aimed at the issues brought forth in this proposal. We feel that this will be the proper venue regarding management decisions.

Proposal 139. Eliminate provisions for a rotational fishery in Southeast Cove Terminal Harvest Area and allow the department to manage the fishery in consultation with hatchery operator.

SUPPORT: All gear groups should be included in any new enhancement production as a plan is developed. Southeast Cove could be very instrumental to every gear group in spreading effort throughout the region.

Proposal 140. Prohibit use of drift gillnet gear for commercial salmon fishing in the Anita Bay THA during the 2018-2020 fishing seasons.

OPPOSE: USAG believes it is not necessary to remove gillnets from the Anita Bay THA altogether and that the increased seine opportunity of 1 to 1, such as we propose in #141, will be enough to positively shift the seiners' allocation percentages, especially given their effective fishing methods.

Anita Bay is one of two terminal harvest opportunities for gillnetters in the entire SSRAA region and the only one in all of central southeast. Anita Bay is a SSRAA release site and SSRAA's contribution to the seine fleet in 2016 was 50% and 45% in 2017; therefore seiners are within their allocated range (44-49%) in southern southeast. Last season, the THA supported 79 gillnetters according to Fish and Game, which significantly helped divide up the fleet.

In September, Southeast Conference reported that Wrangell, the town closest to Anita Bay, was the only southeast community to show an



increase in private sector jobs, due in large part to their investment in the shipyard, which area fishermen utilize and support. Wrangell's gillnet fleet has also grown; today there are 57 resident southeast gillnet permits in Wrangell up 70% from 1992's 40 permits. Conversely, seiners have a much less impact on Wrangell with nine resident seiners in 1992; currently there are eight. The resident seine permit decrease could be attributed to the seine permit buyback in 2008 and 2012, where 24% of all seine permits were "retired". Alaska residency, where barely over half (56%) of seine permit holders are residents versus 83% of gillnetters, is also a huge consideration. The overall seine fishery last season yielded over \$69.1 million. Presumably, since 44% of those permit holders reside out of Alaska, over \$30.4 million is the nonresident seine share. The gillnet fleets' dollars have more staying power, especially in locally-focused areas such as this THA, as only 17% of gillnet permit holders reside out of state. Keeping dollars circulating throughout southeast and Alaska is an important consideration as Alaska continues in financial crisis.

Almost 19% of southeast gillnetters participate in this fishery (F&G reports there were 423 gillnet permits fished this season, 79 of which fished in the Anita Bay THA). Gillnetters' ability to access Anita Bay's THA is very important to our fleet and to the economies of southeast, especially Wrangell and Petersburg. If this draconian proposal were to pass and gillnets were prohibited in this THA, there would likely be more gillnet fishing pressure on areas 11 and 15, possibly resulting in more restrictive measures in those areas.

Importantly, new NRSAA projects at SE Cove, Crawfish Inlet and Thomas Bay will allow increased enhanced opportunity for seines. New production returning in 2019, 2020 and beyond is anticipated to have enough new value to shift enhanced allocation by 10 percent. Crawfish Inlet, aside from its THA opportunity, is anticipated to also have a common property contribution of a large amount of chum available to the seine fleet while they conduct their common property wild pink fishery. With the increased efficiencies of seines' catching abilities since the adoption of the Enhanced Allocation Plan in 1994, having anything beyond a 1-1 rotation between the net fleets would be excessive.

In December 2017, the DIPAC board voted to make \$5.8 million available in cost recovery grants to NRSAA and SSRAA. Previous DIPAC grants to SSRAA have contributed primarily to the seine fleet, which will further lift the seiners' allocation in southern southeast. The latest five-year rolling average of enhanced salmon has the seine fleet 1% below their allocative range. Currently, the Joint Regional Planning Team (JRPT) has recommended adopting a new method of calculating value. This unanimous vote by the JRPT was passed on the precept that the current method of evaluating value introduces error. This new value calculation will be evaluated at the spring JRPT meeting. It would be premature to make a decision that would negatively affect so many individuals based on a 1% deficiency using data likely to have a margin of error greater than 1 percent.

Proposal 141: Adjust net rotation schedules for drift gillnet and purse seines in Deep Inlet and Anita Bay on a 1 day gillnet to 1 day seine net rotations, starting the first EO of 2018 to the last EO of 2020. (USAG)

SUPPORTS: USAG supports this proposal as an effort to lift seiners 1% in their 5-year rolling average.

Proposal 142. Modify drift gillnet and purse seine fishing rotations in the Deep Inlet THA.

OPPOSE: We support NSRAA pulling this proposal as decided by the NSRAA Board of Directors on November 16, 2017. A modified rotation of 1 to 2 (gillnet to seine) at Deep Inlet was anticipated to shift seine value of NSRAA's contributions to the fleet, upwards of 10 percent. Currently, the only gillnet opportunity to harvest any NSRAA enhanced salmon is Deep Inlet. In 2017, NSRAA's total common property salmon contribution was \$11,890,482; the total gillnet fleet harvest of NSRAA enhanced salmon value was 21% or \$2,451,218, and total seine fleet harvest of NSRAA enhanced salmon value was 59% or \$7,045,651. The NSRAA board recognized the resulting effects of this proposal and determined they no longer supported it. It is anticipated if this proposal were to pass it is likely 77% of all NSRAA produced value would be received by the seine fleet.

For many years, the prevailing idea of the NSRAA board has been to solve allocation imbalances through new production opportunities. In recent years, some large-scale chum projects have taken shape; those new production fish are in the water and will soon be returning to benefit the seine fleet and troll fleet.

Residency disparities between seine and gillnet as described in proposal 140 are also relevant here as well as all allocation proposals.

Proposal 143. Change the time, ratio for drift gillnet gear to purse seine gear openings in Deep Inlet THA.

OPPOSE: Opposed based on actions and reasoning described above for 141 and 142. Deep Inlet THA is the only NSRAA region area gillnet opportunity. New NRSAA projects at SE Cove and Thomas Bay will allow enhanced opportunity for seines in the very near future. Crawfish Inlet will make a large amount of chum available to the seine fleet in the conduct of their common property pink fishery. Initially, imbalances should be addressed through new production. With the increased efficiencies of the seines' catching abilities since the adoption of the EAP, having anything beyond a 1-1 rotation between the net fleets would be excessive.

Since 2011, the resident gillnet fleet in Sitka has grown from 19 to 25 permit holders, an increase of 24 percent. If this proposal passes, fishing the Deep Inlet THA would no longer be economically viable and would displace local and regional gillnetters. Sitka residents and Sitka's Advisory Committee recognize the importance of this area and voted to keep the rotation as is.

New NRSAA projects at SE Cove, Crawfish Inlet and Thomas Bay will allow increased enhanced opportunity for seines. New production returning in 2019, 2020 and beyond is anticipated to have enough new value to shift enhanced allocation by 10 percent. Crawfish Inlet, aside from its THA opportunity, is anticipated to also have a common property contribution of a large amount of chum available to the seine fleet while they conduct their common property wild pink fishery. With the increased efficiencies of seines' catching abilities since the adoption of the Enhanced Allocation Plan in 1994, having anything beyond a 1-1 rotation between the net fleets would be excessive. NSRAA fleet contribution percentages are trying to offset DIPAC value that is realized but not a product of the salmon enhancement tax. In December 2017, the DIPAC board voted to make \$5.8 million available in cost recovery grants to NRSAA and SSRAA. Previous DIPAC grants to SSRAA have contributed primarily to the seine fleet, which will further lift the seiners' allocation in southern southeast. The latest 5 year rolling average of enhanced salmon has the seine fleet 1% below their allocative range.

Currently, the Joint Regional Planning Team (JRPT) has recommended adopting a new method of calculating value. This unanimous vote by the JRPT was passed on the precept that the current method of evaluating value introduces error. This new value calculation will be

evaluated at the spring JRPT meeting. It would be premature to make a decision that would negatively affect so many individuals based on a 1% deficiency using data likely to have a margin of error greater than 1 percent.



Proposal 144: Allow increased commercial salmon fishing opportunity with troll gear in the Deep Inlet THA.

OPPOSE: Gear conflicts are sure to arise with this proposal as also noted by NSRAA and the Sika AC. Trollers have access to Deep Inlet production outside the terminal harvest area, seven days a week. Additionally, there is an increase in troll fish opportunity at Crawfish Inlet, which in all likelihood will result in unrestricted access.

Proposal 145: Allow commercial salmon fishing with purse seine gear in Nakat Inlet THA.

OPPOSE: On May 2, 2003, the SSRAA board voted unanimously "to adopt alternative 3 which includes releasing an additional 8 million chum smolts in Neets Bay and 10 million chum smolts in Kendrick Bay for a total of 18 million. SSRAA would commit to a budget increase to cover costs for producing the remaining 10 million fish in the 2004 budget (8 million Anita, 2 million Neets). This would provide gillnetters with exclusive use of Nakat, when the Kendrick Bay fish begin returning stated in the original agreement". USAG stands by the continuing implementation of this motion, which was a sharing agreement for exclusivity of gillnet only in Nakat Inlet and seine only in Kendrick. Nakat Inlet THA is the only regional release site in SE Alaska dedicated to drift gillnet/troll. While it originally was shared with seine, new production was added to Kendrick Bay to allow gear specific terminal harvests. The current Kendrick Bay release is 33 million summer chum, compared to 8 million summer chum released at Nakat. There is currently a seine terminal fishery conducted in Clarence Straights adjacent to Kendrick Bay starting in Stat Week 25 where enhanced chum are harvested, as well as enhanced chums from SSRAA's releases at Nakat, Anita Bay, Neets Bay, and Burnett Inlet.

There is ample opportunity for the seine fleet to harvest not only enhanced fish but to also gain value from incidentals they would not get without the enhanced opportunity. The size of the 8 million Nakat release pales in comparison to the 33 million releases dedicated to seines in Kendrick and would make virtually no difference in the allocation of enhanced fish.

Proposal 146: Do not include enhanced salmon produced by private nonprofit hatcheries in SE AK Area Enhanced Salmon Allocation Management Plan gear-specific value allocations.

OPPOSE: Even though there is precedent by allocations plans in Prince William Sound and nonprofit production is not supported by the 3% salmon enhancement tax paid by all fishermen, we feel this proposal, if passes, would hide value that is not being included in Southeast's entire commercial salmon harvesting picture. In all increased opportunities adopted by regional boards or the JRPT, only enhanced value is assessed while knowing wild value is being shifted without being accounted for. USAG proposes that BOF authorize a task force or work session to thoroughly analyze and consider all commercial catches in SE Alaska (enhanced and wild) to better reflect sharing arrangements between the fleets prior to the Enhanced Salmon Allocation Plan.

Currently, fleets below their allocative range of enhanced fish have been allowed increased opportunity to harvest them in common property fisheries. The consequence of this is that wild fish harvested in this increased opportunity are not counted as a value shift in the Enhanced Allocation Plan. The Plan, adopted in 1994, has been in place well over 20 years yet large imbalances still occur. This and every plan should be reevaluated to see if the assumptions and predictions made were correct and to take into consideration unintended consequences of those actions.

If this proposal were to pass it would shift the seine fleet above their allocation range, basically putting net groups in or above their allocation of enhanced fish. Troll would still be below their allocation and has been in the 5 year rolling average since adoption of the Enhanced Salmon Allocation Plan.

Proposal 149: Extend the closing date for salmon harvest by the hatchery permit holder in Deep Inlet SHA.

SUPPORT: Changing the date to October 31 as suggested makes sense so NSRAA can more easily collect its needed broodstock and/or harvest in Deep Inlet.

Proposal 150: Establish a special harvest area in Crawfish Inlet.

SUPPORT: This proposal will maximize troll opportunity at this release site, which is critical to allowing the troll fleet ample time and area to maximize their share of enhanced fish.

Proposal 151: Establish a terminal harvest area and management plan for Carroll Inlet.

SUPPORT: Support as written.

Proposal 152: Update area description and coordinates of the Anita Bay THA boundaries.

SUPPORT: USAG always supports accurate area boundaries in all fishing areas.

Proposal 153: Repeal the District 1 Pink Salmon Management Plan.

OPPOSE: The current District One Pink Salmon Management Plan has been in place for a long time. It is unique in that gillnet time is adjusted weekly based on seine time in district one. The plan recognizes the seine fleets' superior efficiency at harvesting large volumes of fish in a short period of time, even when the plan was put into effect so many years ago. Recent efficiency upgrades of the seine fleet as a whole, has actually widened the efficiency gap. With the seine fleets' ability to harvest more fish at a faster rate, gillnet time under the current plan has probably been less in recent years than it was in the past, which would only contribute to our inability to realize our allocation guideline for pink salmon.

The reasoning behind this proposal indicates that the gillnet fleet is not managed for pink salmon yet in Districts 6 and 11 we are managed for pinks and accordingly lose time and/or area to secure pink salmon escapement even while the seine fleet sees access in migration corridors that are adjacent to these areas. If gillnetters are part of a pink salmon management plan we probably are being managed for pinks. This proposal also mentions that enhanced production has generated harvest opportunity beyond pink salmon for the gillnet fleet. This is true and since the seine area is adjacent to the gillnet area we assume the seine fleet also has benefitted from this enhanced production.



It is extremely doubtful that the current plan has marginalized the seine fleets' ability to harvest pink salmon. In fact, by all appearances, this proposal seems to be about marginalizing the gillnet fleet with no direct benefit to the seine fleet.



Proposal 154: Establish a management plan for pink salmon in Lower Clarence Strait (USAG)

SUPPORT: This proposal would allow the gillnet fleet opportunity to pink salmon, a species we currently are harvesting below our allocation guideline. Since our time would be tied to seine opportunity in the district, we would be harvesting what is considered an abundant resource. Our presence would in all likelihood have very little impact on the seine fleet's ability to prosecute their harvests, as it is generally recognized that our fleet is much less efficient than theirs. As market conditions improve for pink salmon products thus increasing its value, it is important to our fleet to realize our allocation. This new fishery would be helpful in achieving that. August is traditionally the slowest month for our fleet. This new proposed fishery would help in spreading the fleet during this time.

Proposal 155: Eliminate the wild sockeye salmon harvest limit for the District 12 commercial salmon purse seine fishery.

OPPOSE: Since the sockeye harvest limit for the month of July was implemented in 1989 and altered to preclude enhanced sockeye in 1992, it has proven to be an effective management tool to balance seine opportunity for pinks while protecting sockeye systems important to the gillnet fleet. In 1984, the Board of Fisheries closed seining north of Pt. Marsden for the month of July in recognition of the transitory nature of the stocks in this time frame. Elimination of this limit, or cap, as it is commonly referred to, would with all probability, lead to a more restrictive management regime for the gillnet fleets in both Lynn Canal and Taku in years of high pink abundance. Genetic samples taken from sockeye in this area for the time frame in question showed 25% Taku River, a Pacific Salmon Treaty fish, 9% Chilkoot, and 27% Chilkat, all of which drive the management of the gillnet fisheries in July in districts 11 and 15. These stocks are fully utilized by the gillnet fleet.

Furthermore, the department, in accordance with section c AAC 33.363, has shown a willingness to be flexible and go over the cap in instances of economic opportunity for the seine fleet. This is evidenced in 2011 when on July 18th, they opened the area in question for 39 hours and were within 5000 wild sockeye of the cap. The seines harvested 1.234 million pinks for the period. They also harvested 9286 wild sockeye, putting the final wild sockeye number for July at 20,240. That opener was the last for the seine fleet for July in that area. While there was probably some foregone opportunity by the seine fleet that particular year, 2011 was an extraordinary pink year in the north end. One could even say it was a rare event. So rare, it would be negligent to remove this effective management tool to address such an event. It is also important to note that after the month of July, there is no cap. Management is all about the pink abundance. There are no protections afforded later sockeye run components in Lynn Canal, particularly the Chilkat.

From 1989 through 2017, gillnetters are cumulatively 6% below their sockeye allocation (over 2 million fish) and eliminating the sockeye limit will likely push gillnetters even further below their allocation range. In contrast, seiners are cumulatively 6% above their allocative sockeye percentage for the same time period.

We would also point out that given ADF&G's proposed action plans concerning Chilkat and King Salmon River chinook, liberalization of any existing fishery in northern southeast should probably not be a consideration.

Proposal 156: Modify the Hawk Inlet commercial wild sockeye cap of 15,000 (USAG)

SUPPORT: The sockeye cap is an important tool for ADF&G management in district 12. It provides opportunity to the seine fleet to harvest pink salmon as well as provide reasonable conservation constraint measures for northern migrating sockeye. In 1989, the Board of Fisheries recognized the efficiencies of the seine fleet; moreover the board recognized the importance of the Hawk Inlet shoreline to northern migrating salmon. Also in 1989, the board stated: "As a general matter, the harvest of fish stocks will be managed primarily for the benefit of the user groups within the district to which those stocks are bound."

The data shows a distinctive shift in run timing of northern bound sockeye in the last 10 years, 2008 through 2017, the Chilkoot and Chilkat weir counts and commercial fishing harvests in district 15 show a later more condensed run timing compared to the 1970's through 1988. Consideration should be given to adjust the stat weeks of the sockeye cap to account for the continuing effects of climate change, both now and into the future.

Proposal 157: Include wild sockeye salmon harvested in the Amalga Harbor Special Harvest Area in the District 12 commercial salmon purse seine fishery wild sockeye harvest limit (USAG)

SUPPORT: While we do support the seine fleet having opportunity in Amalga Harbor to harvest excess chum salmon, we also recognize that there will be, and has been, wild sockeye incidentals as this terminal enhanced fishery is located in a corridor for Pacific Salmon Treaty fish bound for the Taku River. In July, we often see restrictive measures when escapement lags, often in the same time frame the Amalga fishery is prosecuted. In the short history of the Amalga fishery, wild sockeye incidental catches have been small. It is a short history however, and as much as we would love the seines to catch some chums, we are not willing to lose time and/or area in our common property fishery to achieve that. The historical catch has been small enough that in most years it will not marginalize the seines' time in district 12 to any significant extent. Speel River sockeye has also been identified in this fishery. In 2017, the Speel River failed to make escapement.

Proposal 158: Include wild sockeye salmon harvested in the Amalga Harbor SHA in the wild sockeye salmon harvest limit for the commercial salmon purse seine fishery in District 12.

SUPPORT: Please see #157 Comments

Proposal 160: Allow commercial fishing for salmon in waters near selected streams in Boat Harbor, Anita Bay, Deep Inlet, and Nakat Inlet Terminal Harvest Areas up to a straight line between the seaward extremities of the exposed tideland banks (USAG and SEAFA).

SUPPORT

Proposal 169: Open Section 6-D the second Sunday of June to commercial fishing for salmon with drift gillnet gear. (USAG)





SUPPORT: Gillnetters are below their allocation of pink salmon, coho salmon and sockeye salmon. While this proposal would displace seines from what has been a traditional area, it is notable that in years of high pink abundance they are afforded opportunity in districts 1, 2, 3, 4, 5; all areas that are transit corridors for pinks and other salmon bound for district 6. Many past seasons have seen extensive openings in these areas and no seine openings in district 6 due to pink salmon escapement concerns. During those seasons, the gillnet fleet in district 6 has seen restrictive management through reduced time to address those escapement needs particularly in August. Having gillnet access to the sections of district 6 currently precluded would allow our fleet an opportunity to reach our pink, coho, and sockeye allocations.

Proposal 170: Open a portion of District 10 the third Sunday of June to commercial fishing for salmon with drift gillnet gear only. (USAG)

WITHDRAW: New information regarding chinook salmon as per ADF&G's proposed action plans regarding king salmon in northern southeast has led us to believe that any changes made in northern southeast in regard to liberalizing or changing any fisheries in a manner that could have unintended consequences should not occur at this time.

Proposal 171: Add District 6 to the mesh-size restriction area and allow implementation of the mesh-size restriction for an additional month.

SUPPORT: Adding district 6 to the mesh restriction will have no impact on our fleet as virtually nobody currently fishes a net greater than 6 inches during this time frame, and mesh restrictions are an important tool utilized by the department to allow opportunity and minimize impact on certain species. We are concerned that the department could utilize both a minimum and maximum 6 inch net restriction at the same time, particularly in districts 11 and 15. This situation would require a gillnet's mesh size be exactly 6 inches. Given the physical properties of the gear, in that it generally stretches over time, a net that was 6 inches new may actually be slightly larger depending on the age and twine size of the net. If this unique situation were to come about, it is our fear that there could be unintentional violations because someone had purchased a 6 inch gillnet but hadn't checked to make sure it remains so. We have been assured by the department that it isn't their intention to make this situation punitive or to preclude participation; we believe them. When we offered 6 1/8 as a maximum, they were unwilling to compromise, stating that their only recourse would be to close the fishery. Given the department's reaction, and in recognition of the problem that the maximum mesh size is being used to mitigate to allow fishing time, we will concede.

Proposal 192: Allow personal use fishing for salmon in District 11.

OPPOSE: There is already in-river fishing opportunities: A personal use gillnet fishery on the Taku River; dip netting in Sweetheart Creek; and subsistence fisheries on the Chilkat and Chilkoot Rivers. This fishery has no time line. Given the current king salmon issues, adding yet another user group would be irresponsible.

Proposal 193: Establish a personal use salmon set net gillnet fishery in Section 15-A.

OPPOSE: There is already subsistence fisheries on the Chilkoot and Chilkat Rivers as well as Chilkat Inlet. This proposal does not include when this proposed fishery would take place. There are currently conservation measures for a stock of concern for the Chilkat River. The resources of upper Lynn Canal are fully utilized. The proposer, living in a rural area, already has subsistence opportunity.

Proposal 194: Allow personal use fishing for salmon in District 15.

OPPOSE: There is already subsistence fisheries on the Chilkoot and Chilkat Rivers as well as Chilkat Inlet. Juneau residents currently have personal use opportunities elsewhere. Adding personal use to such an accessible area by residents of the largest population center in the region has the potential to create a huge user group that would have an immense impact on how the area is managed.

Thank you for your work and consideration,

Cynthia Wallesz, Executive Director



Submitted By  
Victoria Curran  
Submitted On  
12/27/2017 9:42:55 AM  
Affiliation

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Thank you for considering public comments in your deliberation process. Generally speaking I support the positions taken by the Sitka Fish and Game Advisory Committee on these proposals. Although I don't agree with all of their decisions they had a long and open series of public meetings and were inclusive in their discussions. Their votes reflect the majority positions of a wide variety of stakeholders and they attempted to balance the needs of a variety of diverse stakeholders, as evidenced by their decision on herring (amending proposal 99).

I would also like to specifically address two proposals that deal with sport fish limits for non-residents. I support bag limits and annual limits for non-resident anglers. Our state is a leader in resource management and this should include limits on valuable resources before there is a crisis in conservation or management. This allows a full Alaskan experience while still placing appropriate value on our resources.

**Proposal 116: Support with SFGC Amendment.** Blackcod are the most valuable groundfish resource managed by the State. Every commercial blackcod fishery has restrictive management to ensure sustained yield and strong stocks. The NSEI fishery, one of the oldest in our region, with 120 years of participation, had an annual permit limit of about 9,500 pounds this year. The SFGAC voted (10 in favor, 1 abstain) to adopt a nonresident bag limit for blackcod with 2 daily, 2 in possession, 6 fish annual limit, and recording catch. I support this but I would also support a 4 fish daily, 4 fish annual limit to allow fishermen to take their full catch in one trip. Waiting to impose non-resident limits is not acceptable. Look to halibut to see the folly there.

**Proposals 196: Support establishing non-resident annual limits for sockeye salmon in fresh water.** My comments are similar to the rationale above. An annual limit on non-resident take provides for a full Alaskan experience for visitors but still values the use of the resource by Alaskans, in this case, subsistence users. Sockeye are an invaluable subsistence resource. The fact that there is limited take by non-residents at this point in time should not deter the Board for taking appropriate action to limit non-resident harvest. Limits are best imposed before there is a crisis in management or conservation.

Be visionary, not reactive. Impose annual limits for blackcod and sockeye for non-residents for the benefit of all users. Its best for stability in charter business, commercial business, and subsistence users.



## **PROPOSAL 184**

### **5 AAC 29.120. Gear specifications and operations.**

Modify gear specifications for the commercial salmon hand troll fishery, as follows:

(j) Notwithstanding any other provision in this section the following hand troll specifications apply:

(1) a downrigger may not be used with a troll gurdy; (2) a hand troll gurdy or downrigger powered by hand or hand crank may be used in conjunction with a fishing rod, and is not considered power troll gear; (3) an electric, hydraulic, or power assisted downrigger is considered a power troll gurdy and may not be used in conjunction with a fishing rod;

**What is the issue you would like the board to address and why?** allow the use of 2 manually operated down riggers in conjunction with 2 sport rods as a legal means of taking fish in the hantroll fishery year round.

**PROPOSED BY:** Shawn McConnell

I would like to modify Proposal 184 to state that when using 2 manual operated downriggers in conjunction with 4 fishing rods as a legal means of taking fish in the hand troll fishery year-round. The number of leaders and hooks has already been established in **5 AAC 29.120. (2) (B)** that from each fishing rod: only one line with no more than one leader and one lure or two baited hooks per leader. The downrigger lines should not be counted as fishing lines. The user should be able to use the 4 rods as they deem necessary. The limiting factor is the 4 rods and leaders. Those people that break the law are going to do so regardless of regulations.

If the intent of the original regulation was to prevent using too many lines, then that is wrong. Regulations should not be used to dictate morality. Crooks are going to break the law no matter what, and law-abiding hand trollers should not be penalized for the actions of a few.

William Davidson  
Dan O'Neil



Submitted By  
William Vollendorf  
Submitted On  
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Affiliation  
pilot

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I oppose Prop. 159.



Submitted By  
Zach LaPerriere  
Submitted On  
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Dear Board of Fisheries,

Thank you for the opportunity to address Sitka Sound sac roe harvest.

I would like to go on record as supporting Proposal 99. My feeling is that it may not go far enough, but I think it's a good starting point.

I grew up as a child on a sailboat in Ketchikan in 1980s. I vividly remember the joy and activity of the Kah Shakes subsistence and commercial harvest. The natural abundance was staggering. And I also remember the bust and heartache when the fisheries crashed. By the time I was in highschool many of the boats just sat in the harbor growing seaweed for years until they sunk.

I've listened to my elders for decades when they speak about what herring spawn levels used to be. I've listened to their warnings for years, and I've seen the decline in herring spawn that the predicted come true.

I've lived in Sitka for 17 years in a little cabin on the beach, and I've seen one fairly healthy year of reasonably thick spawn covering Thimblevery Bay in front of my house. The old timers and elders tell me it was like this every year when they were young.

I strongly encourage the board to acknowledge that the elders know what they are talking about. Sitka's Tlingit people have thousands of years of knoweldge and management. Right here! If our elders tell us to be more conservative, we damn well better listen.

I'm also concerned about the huge growth in humpback whale populations. There is just no denying that more whales eat more herring, especially since they spend much of the year here than they used to. As I said, I've only lived on the south side of Sitka Sound for 17 years. Those first 10 years I'd only seen a few humpbacks breach and had never seen them bubblenetting from my house. Recent whale numbers here are crazy! Now I see humpbacks breaching almost daily for a total of about 6 months of the year. Bubblenetting has also become common. Just the other day I counted 20 whales while eating breakfast, and I've seen as many as 60 in a stretch of under a mile while in the skiff right out front.

My point is that whales are a known and growing consumer of herring. We're seeing squid in our waters. We're seeing king salmon with less herring in their bellies. Things are changing with less herring in Sitka Sound, and the only intelligent way forward is to be conservative.

As a state we MUST managed Sitka's herring better. So much depends upon herring, and we have so much to loose.

It's time to act as if Sitka's subsistence harvest of herring roe is our top herring management priority. That's what we'd tell the managers in the 1980s if we had a time machine, and it's time to do the same now before we have a complete herring failure.

Again: I encourage you to vote for Proposal 99 and to keep an open mind that we may need even more conversative measures very soon.

Thank you for your time.

Zach LaPerriere  
Thimblerry Bay (near Whale Park)  
Sitka



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

**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/ 29.090**

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

The intent of the spring troll fishery is very specific and clearly stated in the 2015-2018 S.E. Alaska/Yakutat Areas Commercial Salmon Fishing Regulations: *"The department shall manage the spring troll fisheries to target Alaska hatchery-produced king salmon"* (5AAC 20.090 (b)).

There are several tools that the Regulations engage for this purpose. These tools are designed to limit the catch of non-Alaska hatchery-produced fish. An additional tool could be added to complement those which are currently in place. Doing so would allow an increased number of Alaska-hatchery-produced fish to be caught, maximizing this resource for the highest value.

**\*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.)**

We recommend that district 101-29 be exempted from the Regulations' restrictions contained in 5AAC 20.090 (d)(1)(D) during statistical weeks 23-27. This sub-district would be selected based on high historical abundance of Alaska hatchery-produced king salmon during these statistical weeks.

A graph of district 101-29 is attached, depicting the 10-year average spring troll catch numbers for king salmon originating from Canada, Washington, Idaho, Oregon, California and Southern Southeast Regional Aquaculture Association. For this particular sub-district, it is clear that the relative catch of SSRAA-produced versus all other king salmon caught during week 23 through 27 is overwhelmingly Alaska hatchery-produced.





This recommendation is in accordance with 5AAC 20.090 (d)(2) "*consider additional fishing periods based on the best scientific data and on input from salmon trollers*"

Proposed language: New section 5AAC 20.090 (d)(1)(D)(vii) to read "*There is no limit on the number of non-Alaska hatchery produced salmon that may be taken in district 101-29 during statistical weeks 23 through 27, since the percentage of Alaska hatchery-produced salmon taken in that fishery is in excess of 66 percent or more of the king salmon taken in that fishery, averaged over a 10-year period*"

Who would benefit:

- SSRAA would receive more 3% money
- Power and Hand troll fleets
- Fewer disruption in management

**\*Submitted** SSRAA

**By:**

**Individual or Organization**

14 Borch St.

Ketchikan, Alaska

99901

**\*Address**

**\*City, State**

**\*ZIP Code**

N/A

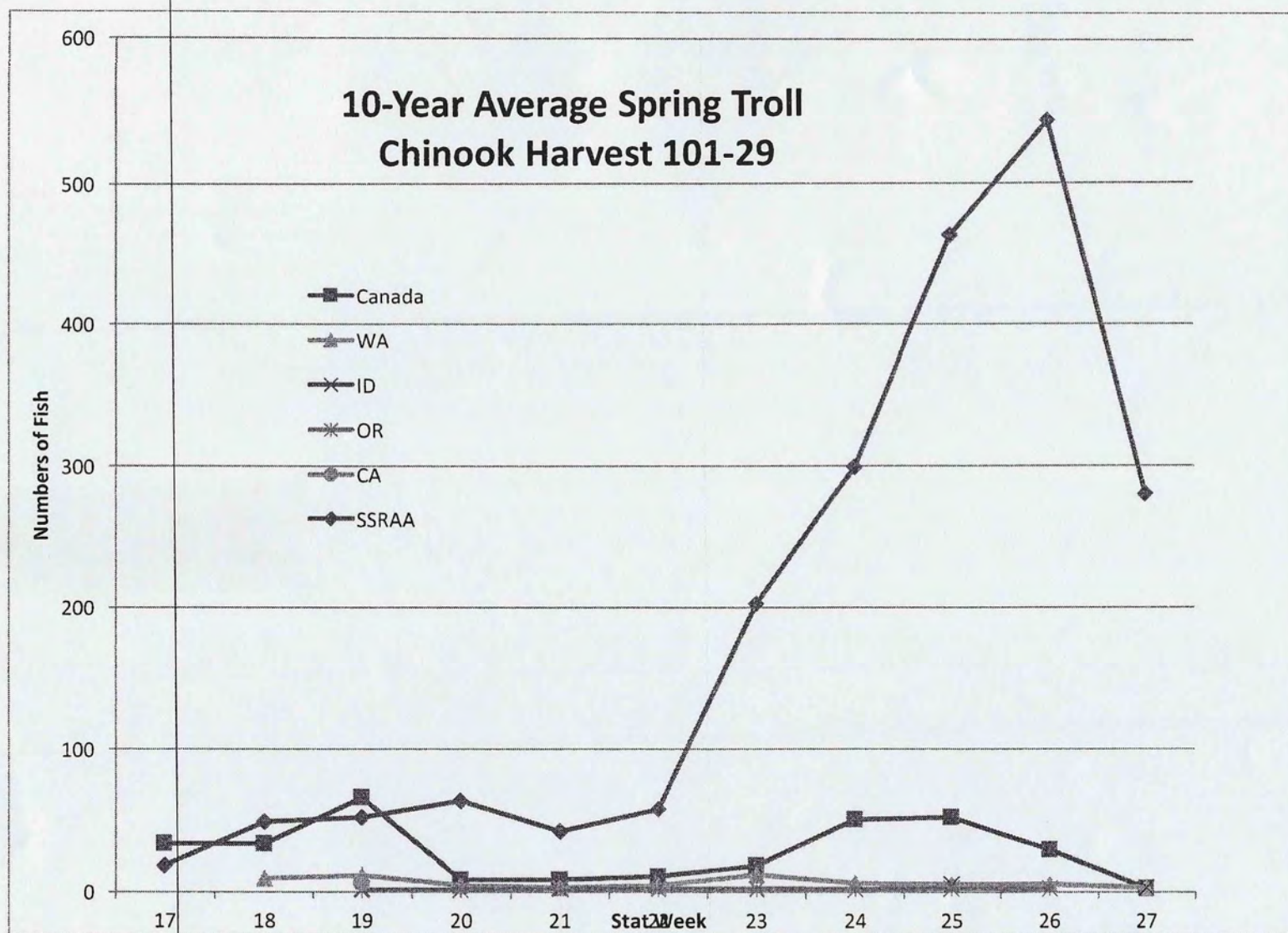
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# Seafood industry rebrands



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1 of 2

## Dogfish nuggets?

By PATRICK WHITTLE  
Associated Press

PORTLAND, Maine -- Call them fish sticks for millennials. At any rate, Dana Bartholomew is banking on college students warming up to "Sharok Bites."

Ipswich Shellfish, of Massachusetts, for which Bartholomew oversees sales, is offering that product — nuggets of dogfish coated in a gluten-free, allergen-friendly crust. Bartholomew, who believes so-called "trash fish" such as dogfish are part of the new wave in New England seafood, already has a couple of colleges on board.

Bartholomew's fondness for dogfish, a species East Coast fishermen catch millions of pounds of every year that sells for just pennies at the dock, is part of a growing trend in fish markets around the country. The industry is putting more emphasis on fish that have traditionally lacked market appeal or economic value as old staples — such as cod, tuna, haddock and shrimp — decline or become the subject of tougher fishing quotas.

"We know we have to make a great-tasting product that supports local fishermen, supports the local industry and economy," Bartholomew said. "And it's local — it's right here."

New England's traditional food fish has long been the Atlantic cod, but it has faded in the face of overfishing and environmental changes. Restaurant owners, fishermen and food processing companies said a growing shift to other species is helping to fill that void. Catch of species such as spiny dogfish, Acadian redfish and scup have all increased dramatically since 10 years ago as cod has fallen.

The shift toward trash fish reflects a broader trend in U.S. seafood toward species that are more abundant. Florida fishing regulators, for instance, have incentivized the hunt for invasive lionfish, which many view as pests. Elsewhere, the Jonah crab has also found acceptance as an alternative to the West Coast's popular Dungeness crab.

The evolution of food from trash to delicacy goes back centuries. Many species have overcome an ugly name or gruesome appearance to grow in value. Lobster, for instance, was long ago regarded as food fit only for the lower classes.

Creating a market for underutilized fish species is important in New England today because of warming waters and corresponding changes in fish populations, said Melissa Bouchard, chef at the popular

DiMillo's On the Water restaurant in Portland.

"We're trying to get the focus off of cod and haddock and Northern shrimp and bring to light all these species in the Gulf of Maine that are delicious and abundant," Bouchard said.

She served dogfish tacos at a festival in food-crazy Portland and they were well received, she said.

The movement toward trash fish is not without skeptics, some of whom point to sustainable harvesting programs for fish that already have broad market appeal. Ray Hilborn, a marine biologist with the University of Washington, said the push is unnecessary from a sustainability point of view.

"If they truly believe that traditional species are not sustainable, then they don't know much and have not looked very hard," Hilborn said. "There is plenty of cod, haddock, salmon, tuna and shrimp in the world that is sustainably harvested."

But Azure Cygler, a fisheries specialist with the Coastal Resources Center at the University of Rhode Island, said the shift toward what toward what she called "underloved" species is critical for sustaining fisheries and providing local protein

sources in New England.

She pointed to the growth of scup, an Atlantic species sometimes sold as "porgy," which has grown from less than 3 million pounds in 2000 to more than 15 million pounds in 2014 and is now advertised by Whole Foods. The fish could be just a more

attractive name away from a bigger breakthrough, she said.

She suggests "silver bass." "If you demand it, it will happen," she said. "It's getting that demand, and then getting fishermen to bring it in. And changing our culinary culture."



Redfish are displayed at the Portland Fish Exchange in Portland, Maine on Jan. 7. Fishermen are being forced to start adapting more quickly to changing fish stocks and marketing new species. As a result more former "trash" fish such as redfish, dogfish and

Don Westlund and Larry McQuarrie (info submitted with proposal 148)





# New tricks for dogs, flats

Careful and cooperative efforts by commercial and recreational fishermen in 2008 finally succeeded in pushing up a downward spiral in the summer flounder fishery. Now they are on track to win a reopening of commercial fishing for spiny dogfish in federal waters on May 1, a turnaround that would give netters 3,000-pound trip bycatch limits and reduce the numbers for a species that have become the scourge of party and charter boat captains.

Commercial fishing groups like the New Bedford, Mass.-based Fisheries Survival Fund got deeply involved in research on monkfish, scallops and surf clams that helped bring convergence between scientists' and fishermen's views of the resources. The 2008 successes with fluke and dogfish showed what the commercial and recreational sectors can do together.

"The germ for involvement on the science side came from the scallop experience," says Ray Bogan, a New Jersey lawyer who works on fisheries issues and is closely involved with the summer flounder and dogfish efforts. "I've said for seven or eight years now, science is power in the context of fisheries."

Dogfish harvests are on track to begin in federal waters May 1, once NMFS acts on recommendations from the Mid-Atlantic Fishery Management Council. "We're looking at an increase from 4 million pounds to 12 million pounds in the coming fishing year, and an increased trip limit from 600 to 3,000 pounds," says Jim

Armstrong, an analyst with the Mid-Atlantic council. One rationale for reopening federal waters beyond three miles is female dogfish tend to stay close to shore, while "males are at a historic high," Armstrong says.

## NORTHEAST

Gillnetter Mike Karch of Barnegat Light, N.J. is ready to go. It's common to run into dogfish packs in spring, "and now we can keep that 3,000 pounds and make a little money on it," Karch says.

Mounting evidence of spiny dogfish abundance reached a tipping point in late 2008, says Greg DiDomenico, executive director of the Garden State Seafood Association in New Jersey. "Looking objectively at the science and all the parameters," scientists and officials at NMFS began turning away from a long-held position that it would take years more for dogfish to recover from the 1990s directed fishery, he says.

The Garden State group, along with the party and charter boat association United Boatmen of NY/NJ and other advocates, organized a workshop in Philadelphia last September to discuss possibilities for increasing the dogfish catch. "I'd like to think our outreach and publicity efforts talking about the problem changed their minds," DiDomenico says of NMFS officials. But the change was already under way, he adds.

Says Bogan: "I think we have a new paradigm." The dogfish coalition had been gearing up for a long campaign, modeled on the successful Save the Summer Flounder Fishery Fund and its effort to construc-

## Yearbook 2009

tively engage with the stock assessment review process.

The flounder quota was pounded down for years, from 30 million pounds in 2005 to 15.77 million pounds in 2008, at the insistence of NMFS officials and environmental groups who said the fishery was out of control and violating the mandate of Congress to end overfishing. Despite fishermen's reports of abundance, much blame was aimed at the recreational sector — based on federal angler surveys that in turn were criticized as inaccurate.

For a while, recreational groups had eyed the commercial sector's 60 percent share of the quota. But recreational advocates decided the problem lay in the process. After raising money from the recreational and commercial sectors, the summer flounder fund committed around \$100,000 to finance scientific work analyzing flounder data, and hired Mark Maunder, a senior scientist at the Inter-American Tropical Tuna Commission and recognized expert on stock assessment.

Maunder came in with understanding that summer flounder interests were not

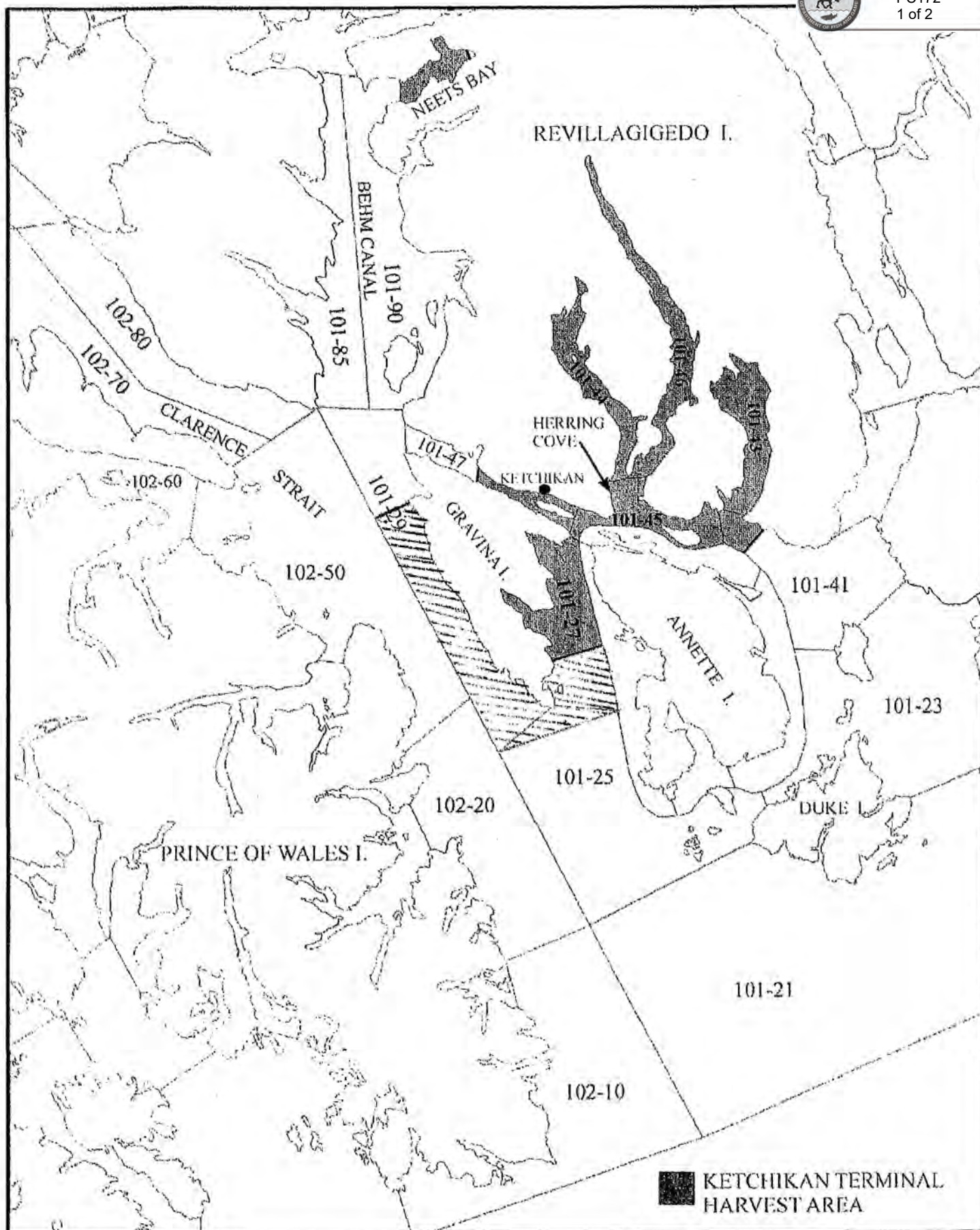
looking for a pre-determined conclusion, Bogan says. "We told everyone that if the science doesn't come out well for our point of view, at least we can say we did the right thing," he says. That approach "builds confidence in management" that's been seriously eroded by years of data gaps and politics, he says.

With Maunder's help, stock assessors found previously missed data points and plugged them into their modeling. After a four-day meeting in June 2008, the summer flounder stock assessment committee came up with a sharply downward reckoning of realistic biological targets for the fluke biomass, setting it at 132 million pounds instead of 197 million pounds.

The recalculations concluded that assumptions about aging and natural mortality in the flounder stock had been incorrect. The Mid-Atlantic council bumped the 2009 quota back up to 18.45 million pounds. If the reassessment holds, by 2013 the quota could be back to around 29 million pounds — almost the point when the overfishing numbers game started in 2005. — Kirk Moore



The Mid-Atlantic council backed a threefold increase in dogfish landings, from 4 million to 12



PAGE 2

Don Westlund and Larry McQuarrie (info submitted with proposal 115)



(101-29) THE AREA FOR INCREASE



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Table 2.-2015 Spring troll fisheries harvest and opening dates.

Spring Fishery Areas		Initial Opening	Total Catch	AK Hatchery Catch	AK Hatchery Percent	Days Open
101-21	West Rock	13-May	2,462	671	27%	18
101-29	Ketchikan	16-Apr	3,612	1,857	51%	64
101-45	Mountain Point	16-Apr	2,332	1,611	69%	66
102-09	Stone Rock Bay	10-May	2,724	310	11%	14
102-10	Kendrick Bay	10-May	2,071	1,022	49%	30
102-50	West Clarence Strait	1-May	1,005	229	23%	51
103-50	Bucareli Bay	3-May	711	208	29%	22
105-41	Sumner Strait	3-May	1,319	353	27%	20
106-30	Steamer Point	3-May	568	91	16%	43
106-41	Snow Pass	7-May	353	0	0%	43
106-43	North Sumner Strait	16-Apr	134	32	24%	46
107-10	Ernest Sound	16-Apr	537	124	23%	76
108-10	Chichagof Pass	3-May	649	340	52%	27
108-40	Craig Point	3-May	25	0	0%	27
109-10	Little Port Walter	7-May	1,362	196	14%	17
109-62	Tebenkof Bay	10-May	2,822	774	27%	9
110-31	Frederick Sound	16-Apr	891	209	23%	76
112-12	Chatham Strait	16-Apr	7,606	3,229	42%	64
112-65	Hawk Inlet	1-May	119	0	0%	61
113-01	Western Channel	10-May	3,970	1,241	31%	13
113-30	Redoubt Bay	30-Apr	1,344	367	27%	18
113-31	Biorka Island	1-Jun	1,763	136	8%	4
113-32	Goddard	10-May	448	30	7%	16
113-41	Sitka Sound	16-Apr	10,041	3,622	36%	65
113-62	Salisbury Sound	30-Apr	1,682	478	28%	30
113-95	Lisianski Inlet	16-Apr	459	118	26%	40
113-97	Stag Bay	1-May	89	0	0%	61
114-21	Cross Sound	1-May	164	0	0%	61
114-23	South Passage	1-May	29	0	0%	61
114-25	Homesore	1-May	293	0	0%	61
114-27	Point Sophia	16-Apr	217	243	112%	72
114-50	Port Althorp	4-May	1,509	555	37%	29
183-10	Yakutat Bay	4-May	382	0	0%	8
Total			53,692	18,046	34%	

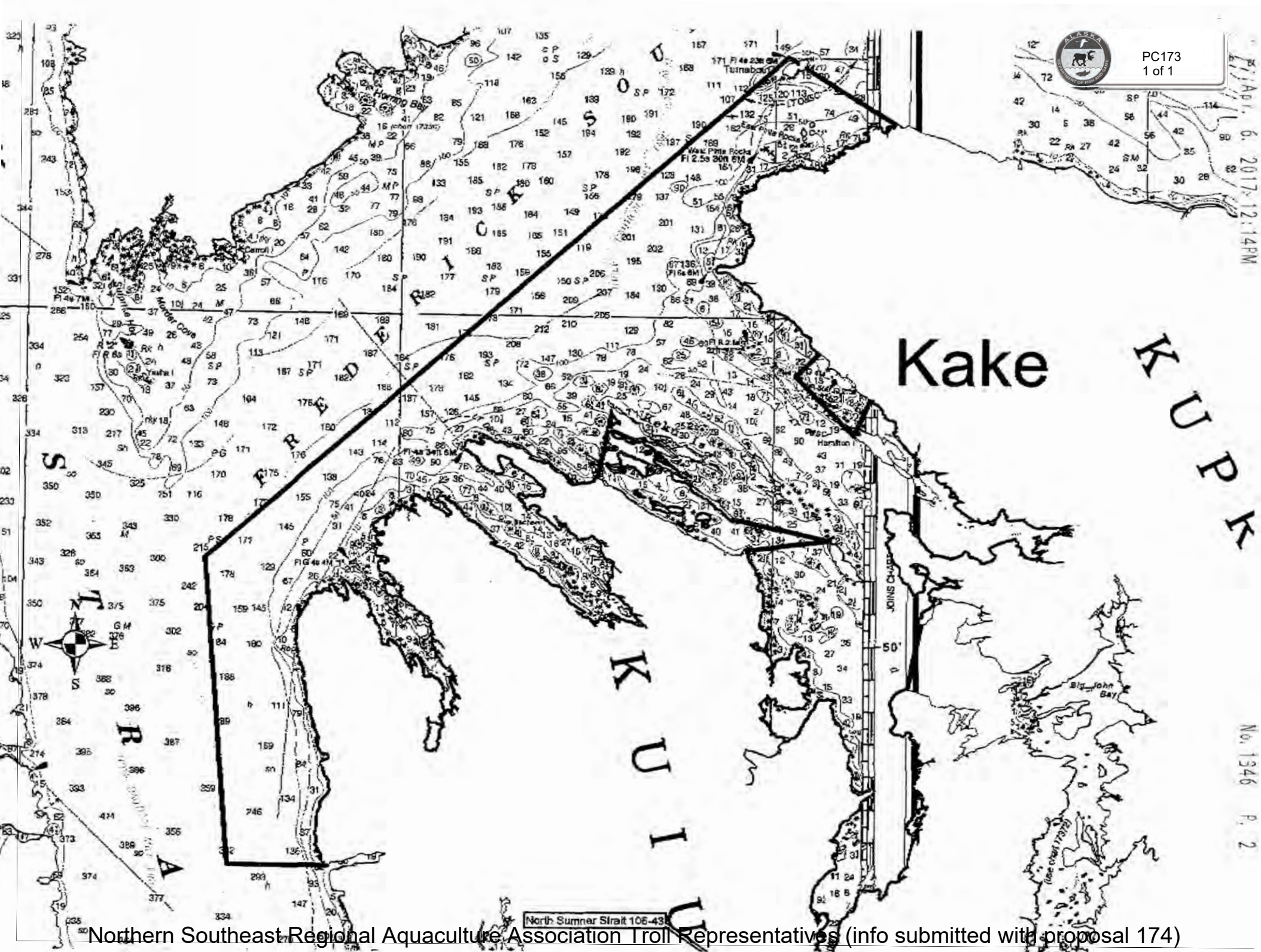
Note: Non-Terminal Fisheries Only

TERMINAL HARVEST AREAS		Open	Close
101-10	Nakat Inlet	1-May	10-Nov
101-95	Neets Bay	16-Apr	10-Nov
107-35	Anita Bay	1-May	10-Nov
109-11	Port Armstrong	1-May	30-Sep
112-22	Hidden Falls	16-Apr	10-Oct
113-35	Silver Bay	24-May	30-Jul
113-38	Deep Inlet	7-Jun	3-Oct





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**SSRA PROPOSAL TO THE ALASKA BOARD OF FISHERIES**  
**CARROLL INLET TERMINAL HARVEST AREA (THA)**

**THA BOUNDARY**

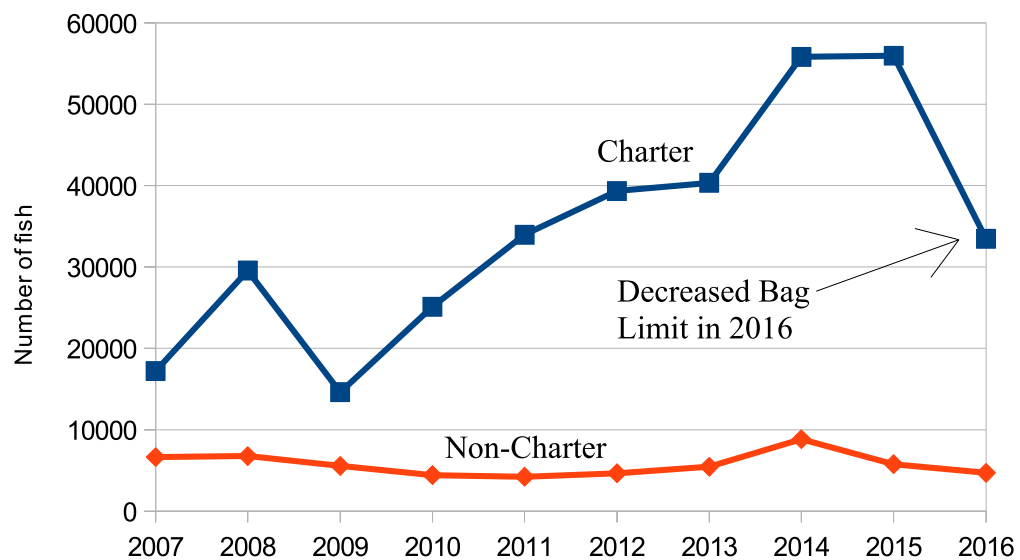
**EXPANDED THA BOUNDARY**

## THA BOUNDARY

## EXPANDED THA BOUNDARY



### Sport Pelagic Rockfish Catch CSEO



Tad Fujioka (info submitted with proposal 127)