

On-Time Public Comment List

Alaska Board of Fisheries: Arctic-Yukon-Kuskokwim Finfish
Anchorage, AK, January 15–19, 2019

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Submitted By
Alan Tonne
Submitted On
12/31/2018 2:29:07 PM
Affiliation

Board of Fisheries,

I have utilized the Minto Flats Northern Pike Subsistence Fishery for the past 12 years or more. I do not support Proposals 63, 64, 65, 66, 67 or 69. The only proposal that I support is 68 or no changes to the current regulations.

When you look at table 2 in the Overview of the Minto Flats Northern Pike Subsistence and Sport Fisheries by ADF&G. The lion's share of fish is being taken by sport fish (roughly 68%) when subsistence fishery's is (roughly 32%) If any restrictions on the fishery are to be added they should look to the Sport Fisheries which is allowed to use treble hooks that results in a higher mortality rate for catch and release fish.

There is omitted data also in table 65-2 for fish less than 16 inches is there a reason for that?

What is the goal for this fishery to change it to a sport trophy area?

Alan Tonne

Submitted By
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Submitted On
12/15/2018 3:42:45 PM
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I'm writing this letter to express support for Proposal 177. It is well understood that NSRAA's enhancement production (prop 150) is intended to be accessed by all gear groups. The extraordinary success at Crawfish Inlet should be no different, and allowing exclusive access to troll and seine users will only tip the balance of allocation. Allowing NSRAA to be involved with establishing gear rotations will address allocation imbalances in real time. Thank you for supporting Prop 177. My family and community are grateful.

Submitted By
Ben Dobrovolny
Submitted On
12/31/2018 12:07:37 PM
Affiliation
Fairbanks Resident

Regarding the proposals for the Chatanika Northern Pike Subsistence Fishery I am opposed to proposals 63-67 and 69, and I support proposal 68.

I have been a resident of Fairbanks since 1998 and am a husband and father of 2 young children. As a wildland firefighter I have limited options over the summer to harvest fish. This subsistence fishery has given me the opportunity to reliably put fish in the freezer.

Participating in this fishery is major endeavor and a once a year activity for my family. The approximately 60 mile round trip trail starts on an exposed often windy ridge then drops down to the Chatanika where it is generally very cold. Due to the inherent risks of winter river travel we coordinate this trip with friends and always travel as a group.

Further restrictions on this fishery will make the effort to participate in it unreasonable for my family.

Submitted By
Chariton Epchook
Submitted On
12/13/2018 2:27:25 PM
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As the proposer of this proposal, I would like to amend proposal as follows:

Proposal 120 Amendment

5 AAC 71.030. Methods, means and general provisions – Finfish.

Close sport fishing and rafting on the Kwethluk, Kasigluk and Kisaralik Rivers from May 1 to October 31 June 12 to July 25 in times of conservation for any species of salmon as follows:

Closure of sports fishing and rafting at prime salmon spawning tributaries of the Kuskokwim River, namely the Kwethluk, Kasigluk and Kisaralik Rivers that flow into the Kuskokuak Slough and Kuskokwim River starting May 1 to October 31 June 12th to July 25th of each year conservation of salmon species (Chinook, Chum, Sockeye and Coho) is warranted.

What is the issue you would like the board to address and why? Rafting and sports fishing in times of salmon conservation (Chinook, Chum, Sockeye and Coho) on the Kuskokwim River and its tributaries. Rafters and Sports fishers will contaminate disrupt the headwaters and lakes where salmon species spawn in the tributaries of the Kuskokwim River. Sports fishing and rafting during conservation closures disrupts residents, these residents become uneasy and wait until openers for subsistence fishing in these three rivers and in the mean-time while subsistence users cannot set their set nets within these three rivers that they customarily set nets, sports fishing and rafting activities are happening in the head waters of these three rivers. Subsistence activities should have precedence over any sports or recreational activities in times of conservation for any salmon species within these three rivers on the Kuskokuak Slough.

PROPOSED BY: Chariton Epchook

(EF-F18-030)

Submitted By
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11/26/2018 8:06:23 PM
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Gillnetter

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I support crawfish hatchery going on a rotational schedule between the net fisheries to help insure that the allocation between gear groups will fall within the boundaries set



To those concerned with the Sitka herring fishery,

This letter is in regard to the upcoming Sitka herring fishery in 2019. There are a few intentions in taking the time to write this. I understand much of the wording involved here is best to include a bit of care so as not to be mistaken or misunderstood. Plainly, I'd like to point out this: our chances of harvesting the allotted quota for 2019 is very slim. I see an importance in writing this letter to explain why.

Maybe it's best to introduce myself before I continue. My name is Chuck Skeeck. I've been a participant in the fishery for nearly 30 years. I grew up in the fishery under my father Leonard Skeeck. When the fishery went limited entry in the early 70s Leonard was among those to receive one of the original permits. He remained active in that fishery from that time, but since 2008 the permit has been in my possession. Our family has been involved in subsistence herring harvests in the Sitka area for quite some time, and many around Southeast may recall the generosity by my father as he provided subsistence roe throughout the years to those in various communities. I'd like to state that as a consumer of herring subsistence that I am in support of subsistence and commercial harvesting. As a commercial fisherman, I've spent my time supporting both ways of life, and I would say to this day that I am thankful to have had the opportunity to benefit from both.

I've been fortunate to have grown up in a region of Alaska that justifiably takes pride in who they are and what they do. Having been raised in a family of fishermen, I was also fortunate enough to have had a family that sought to preserve some of our Tlingit culture. A look at the various fisheries around the state will reveal a substantial amount of people like myself, and the sac roe fishery can be held in the same regard. Past surveys have shown significant native participation in the sac roe fishery, and perhaps it should be viewed positively that we've taken advantage of such opportunities.

I am a strong supporter of responsible management. I believe the fisheries around the state are only present because of this type of management, and the two should continue to go hand in hand. There are many statutes and laws involved with any fishery in this state, and Sitka's herring fishery can be held in the same regard. These laws are in place for many reasons but I highlight their need to protect a resource. The guideline harvest level (GHL) is a result of those laws, and I expect a continued conservation because of that. This brings me to the greater point of this letter.

Market conditions will inevitably change year after year. It's been stated in various forums and news releases of the reasons as to why the quota wasn't harvested last year. I think those statements have been heard already, but for those that haven't been informed I'll reiterate that market demands and size restrictions prohibited the fishery from continued harvesting. So maybe history repeats itself, and maybe we see the same happen this year as market demands may not change.

There is a GHL of 12,869 tons of a mature biomass of 64,000 tons, and some rough figuring can be applied for an expectation for the coming year. I see benefit in taking the time to consider this for proper expectations and maybe some early preparations. The minimal average weight restrictions for herring last year seemed to vary from company to company but for this letter we'll use the conservative number of 100 grams as that seemed more common among the companies. Anything less than a cutoff was simply not to be taken. If we take a moment to look at the age classes and



their average weights for the upcoming year, we can safely include the 6 yr olds an older of the biomass in this marketable category. This age class will account for roughly 24% of the overall biomass, so that number is part of what we will count as being in. If we continue with this weight minimum in mind, we'll notice the 5 yr olds fall at an average weight of just 1 gram above that 100 gram minimum. For a conservative approach to this age group, it may be best to count in half of them. That number is roughly 10% of that 5 year class, thus bringing us to a rough figuring of only 34% of the overall biomass that can be considered marketable. That percentage is also representative of the GHL of 12,869 tons, so one can see we're looking at a number that is considerably less than what is allowed.

There are other factors involved that may lower that figure to be harvested. If the fishery is conducted in a competitive style, then as traditionally done so we will see days lost to processing. Days will also be lost to poor sampling. Within any day of sampling or fishing, there are also state and federal waters closed to commercial fishing that will likely have their intended effect to limit availability. As nature has its way, you will never see a complete separation of age classes, so there is also the chance that having smaller fish mixed can eliminate a chance at conducting a fishery for any day. As stated, the minimum weights were not universal among companies and may have been higher. All these factors, among many others, still run the chance of lowering what we've been able to figure so far.

I feel compelled enough to take the time to make some of these points known in a public manner. Perhaps some misconception can be avoided, and a constructive approach can be taken for what appears to be a likely outcome. If an industry and the public can come out of the winter with these numbers in consideration, perhaps some surprise can be prevented and a picture of fleet activity having a lesser impact on a biomass can be imagined. The safety of a resource is always something I have in mind with the fisheries I find myself participating in around the state, and I expect this year in Sitka to be conducted with the same care. I would like to close this letter by adding that this information is provided with a respect to the resource we're privileged to harvest from each spring. This letter is also provided with the same reverence to the community of Sitka and all those that have an interest in this resource.

Sincerely,
Chuck Skeek



Submitted By
Cyril Okitkun
Submitted On
1/2/2019 3:16:13 PM
Affiliation

I'd like to thank the board of fish for taking the time to go over my comments. I submitted proposal # 104 to allow commercial fishing in the lower 3 miles of the pastuliq and pastularaq(pastuliaq) rivers. I believe when the boarderline was moved to Pt. Romanoff the fisherman in our area anticipated that the two rivers would be open to commercial fishing but that wasn't what happened or the fisherman didn't get the desired effect of having the two rivers open to commercial fishing. However the rivers are open to substance harvesting and I'd like the board to consider opening the rivers for commercial harvesting. As the wording in the proposal says fish headed for the Yukon mill near the mouth of the rivers. That is the reason why I'm requesting the lower 3 miles to be opened, also near the mouth is mostly saltwater like most river mouths. I'd like to say these are historical sites because my grandfather's once lived in pastuliq years ago and harvested fish there. Pastularaq has fish camps in there still in use. Using the same rational as the black river to allow commercial fishing in the rivers seems appropriate. Honestly I feel that allowing commercial fishing there isn't gonna hurt anyone because no community's are located in the rivers. As many might know already a lot of villages in our region are one of the most economically deprived in the nation and opening these rivers would allow a little financial opportunity for the local fishermen. Please open the two rivers for commercial fishing. Cyril Okitkun
Commercial fisherman from Kotlik, Ak.

Submitted By
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Submitted On
12/31/2018 3:39:13 PM
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Minto Flats Northern Pike Management Plan. Proposals 63 through 69.

The Fairbanks Advisory Committee conducted public meetings over the last year and came up with a compromise plan from all of the proposals (63-69) and public comment submitted. This compromise represents the people who actually use this subsistence resource and those who want to severely restrict this fishery. The Board should adopt this compromise plan that was hammered out by the Fairbanks AC. Any other plan adopted that would limit the subsistence fishery without affecting the sport fishery will very likely bring a law suit against the State as it would go against existing Alaska Statutes.



Submitted By
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1/2/2019 10:05:50 PM
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I fully support proposal 177. As a gillnet representative on the NSRAA board, we view this proposal as strictly house keeping, this should have been accomplished with last January's 2018 proposal 150. Unfortunately, due to language and confusion the original intent of the NSRAA board was lost. Proposal 150 was passed by the BOF but failed to grant common property opportunity inside the Crawfish THA to all three SE gear groups. Proposal 177, seeks to remedy the original intent of the NSRAA board and is further supported again by the NSRAA resolution dated November of 2018 by a desire to grant common property opportunities to all three SE gear groups inside the Crawfish THA.

Thanks,

Dan Pardee



Eastern Interior Alaska Subsistence Regional Advisory Council

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RAC/EI 18031.KW

DEC 21 2018

Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
1255 West 8th Street
Juneau, Alaska 99811-5526

Re: Comments on Alaska Board of Fisheries 2018/2019 Proposals 87, 88, 92, 96, and 100

Dear Chairman Morisky:

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to submit its positions and comments on Alaska Board of Fisheries (BOF) 2018/2019 proposals 87, 88, 92, 96, and 100 that will be discussed at the Alaska BOF Meeting on the Arctic/Yukon/Kuskokwim Finfish proposals scheduled to be held on January 15-19, 2019. The Council deliberated these proposals during its fall 2018 public meeting held on October 11-12, 2018.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Eastern Interior Region. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter established the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside its region that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

Proposal 87: 5 AAC 01.220. Lawful gear and gear specifications.

Allow subsistence fishing for salmon with drift gillnets in the entire Yukon River.



Chairman Morisky

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Council recommendation: Oppose

Council comments: It is the Council's opinion that the intent of this contradictory proposal is to make a statement and to force managers to finally realize that drift gillnets can be unmanageable, unpredictable, and detrimental to the run. The Council realizes that drift netting probably cannot be stopped completely and that this proposal is needed to get users to realize that they need to continue with conservation efforts for a longer time period. Some Council members have been involved in conservation efforts, including reducing driftnet fishing on the Yukon River since 1999, and understand that if drift nets are allowed in the entire river, the quality of escapement will decrease. Targeting larger fish with drift nets is a great conservation concern. This proposal gives equal and fair opportunities to all subsistence users throughout the entire river and will have short-term benefits to them, but with likely long-term adverse impacts for the conservation of salmon stocks.

Proposal 88: 5 AAC 01.220. Lawful gear and gear specifications.

Require fish wheels to be closely attended during times of conservation for any species.

Council recommendation: Support

Council comments: In its deliberation of this proposal, Council members highlighted their observations and 20 years of studying the impacts of live boxes on both Chum and Chinook Salmon. The fish caught in live boxes are 10 to 15 times less likely to be able to return to spawning grounds. Live boxes should not be used as a conservation tool to preserve Chinook Salmon during run rebuilding because they are adversely impacted by their use. Chinook Salmon can easily damage themselves by panicking while in a live box. The Council discussed different mechanisms for releasing live Chinook Salmon from a fish wheel, but concluded that all methods increase mortality. Therefore, releasing Chinook Salmon into the wild, especially when there are conservation concerns for the stock, is not recommended.

Proposal 92: 5 AAC 01.220. Lawful gear and gear specifications; and 5 AAC 05.331. Gillnet specifications and operations.

Restrict gillnet mesh size to a maximum of 6 inches in Districts 4, 5, and 6 subsistence and commercial salmon fisheries.

Council recommendation: Support

Council comments: Reduced mesh sizes decrease the drop-out rate of larger fish. Specifically, if the mesh size is reduced to 6 inches the only occurring drop out will be of a smaller fish size and the large fish will not be caught. The Council recalled that the main argument for not using 6-inch mesh was its effectiveness in catching summer Chum Salmon; however, there are almost no summer Chum in the upper portions of the river. They are not used as much for human consumption there. This proposal would restrict subsistence users in Fishing Districts 4, 5, and 6, and would require a sacrifice in order to further long-term survival of Chinook Salmon. The Council also cited a 1981 report to the BOF about restricting mesh size to 6-inch mesh in Cook



Chairman Morisky

3

Inlet. The report concluded that no directed Chinook Salmon fishery is sustainable with gill net mesh size larger than 6 inches. Some fishers in Eagle have been using 6-inch gear all summer and were able to meet their subsistence needs. Furthermore, as fish size decreases over time, 6-inch mesh will become a more efficient mesh size than 7-inch.

Proposal 96: 5 AAC 01.210. Fishing seasons and periods.

Allow subsistence fishing for fall chum salmon in District 5 without time restrictions if commercial fishing for fall chum salmon is open in other Yukon River districts.

Council recommendation: Support

Council comments: This proposal would make it easier for fall Chum Salmon to be hung and dried during periods of good weather and thus more capable of preparing for human consumption. There is no potential for a conservation concern because managers have the ability to close a fishery if necessary. This proposal would allow people in District 5B to harvest Chum Salmon when dry weather conditions are present. This kind of flexibility is needed in a changing climate. Weather is a huge issue for people in this part of the river when it comes to putting up fish. During deliberation of this proposal, Council members noted that last year was a bad year for drying fish.

Proposal 100: 5 AAC 05.333. Fish wheel specifications and operations.

Adopt maximum size and depth restrictions for fish wheel baskets,

Council recommendation: Oppose

Council comments: This is a frivolous proposal that creates divisiveness among user groups up and down the river. This Council has been working hard to unite communities along the river and to have a constructive, meaningful dialog. Everyone has different size baskets and users are not going to rebuild their fishwheels. It is a one-size-fits-all proposal. There needs to be variation up and down the river as different basket sizes are appropriate to different parts of the river. The basket size in the proposal is not appropriate for all parts of the river. There needs to be more cooperation among users on the river.

The Council shares this letter with the BOF and the Federal Subsistence Board, to emphasize the importance of these issues to the subsistence needs of the people of Eastern Interior Region.



Chairman Morisky

4

Any questions regarding this letter can be addressed directly to me through our Subsistence Council Coordinator, Katerina "Katya" Wessels, at (907) 786-3885 or katerina_wessels@fws.gov.

Sincerely,

Susan L. Entsminger
Chair

cc: Federal Subsistence Board
Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management
Orville Lind, Acting Deputy Assistant Regional Director
Office of Subsistence Management
Jennifer Hardin, Ph.D., Subsistence Policy Coordinator, Office of Subsistence Management
Carl Johnson, Supervisory Program Analyst, Office of Subsistence Management,
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management
Pippa Kenner, Acting Anthropology Division Supervisor
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Frank Harris, Fisheries Biologist, Office of Subsistence Management
Katya Wessels, Subsistence Council Coordinator, Office of Subsistence Management
March Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Nissa Pilcher, Regional Coordinator, Interior Region, Board Support Section
Alaska Department of Fish and Game
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Submitted By
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12/27/2018 8:49:30 PM
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Dear BOF members, Chairman etc...

My name is Evan Love. I am a southeast gillnetter that lives year round in Sitka, Alaska. I attended many of the meetings last year when BOF had its three-year cycle meeting in Sitka. After listening, reading, reviewing information, and listening to testimony I came away from the meetings thinking gillnetting would be allowed in the Crawfish THA/SHA (terminal harvest area/ special harvest area).

This year, 2018 crawfish produced a massive return - 3,231,518 chums were harvested. The seine fleet harvested 1,734,400 chums in common property fishing. These chums accounted for 54% of the total Crawfish harvest. Cost recovery in Crawfish was an additional 39% of the total harvest, which means the seine fleet actually harvested more like 93% of the common property fish in 2018 at the Crawfish THA! Trollers harvested 239,652 chums, this was 7% of the Crawfish harvest. Gillnetters were not allowed an opening at Crawfish and thus harvested 0 chums! This was 0% of the Crawfish harvest!

Crawfish was a great success for NSRAA and southeast seiners alike. On a poor Southeast pink salmon year this was a great alternative for some seiners to make a lot of profit during a dismal season. I'd like to point out that it was a poor pink salmon year for Southeast gillnetters as well. In addition to that, and most importantly, Deep Inlet THA was cut back by the BOF in 2018 to limit Southeast gillnetters to 2 days a week in the Deep inlet THA. Seiners were given 4 days a week to fish Deep Inlet this year. So for gillnetters, our days were cut back substantially in Deep Inlet this year to the benefit of the seine fleet, and then we weren't allowed to fish Crawfish at all, which almost exclusively went to the seine fleet and 7% to trollers. In 2018 Seiners harvested 1,056,582 chums in Deep inlet, 65% of the common property. Trollers harvested 123,740 chums, 8% of the common property, and Gillnetters harvested 301,479 chums, 19% of the common property. The numbers don't lie. These numbers came from the NSRAA website and are available for any of you to see. It seems like an allocation imbalance, and this allocation distribution should be revisited as soon as possible. During this season, when crawfish was opened for common property, gillnetters tried to discuss a 1 to 1 rotation between seiners and gillnetters. However, allowing gillnetters to fish in Crawfish was said to be illegal because of some written error that occurred during legislation of a proposal that would have allowed gillnetting in Crawfish? This was the excuse I heard. In any event, the season has come and gone and many fish were caught, but gillnetters were never allowed into Crawfish to harvest chums. In the future it would be great if Fish and Game, NSRAA, BOF or whoever actually makes the decisions spreads out the common property to all three gear groups. After all, we are all paying the same enhancement tax.

Proposal 177 should allow gillnetters to take part in the Crawfish THA. This is important to the future allocation issue that will come up. Crawfish can definitely be an area to remedy allocation disputes among the gear groups. In closing, thank you for reading my comments and please consider the importance of allowing Southeast gillnetters into the Crawfish THA.

Evan Love

F/V Miss Nikko 87

Sitka, AK

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Submitted By
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12/11/2018 9:27:43 PM
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I am submitting a comment for proposals 73 and 74. I am combining the two because they are similar and I will make a lot of the same points. I am in opposition of both. I am an avid Greyling fisherman and make trips north to fish both of these streams almost every year. I think it would be in the best interest of the people to maintain catch and release regulations on these streams to maintain the quality of the fishery. Both of these rivers are excellent fisheries and I think it is great that anyone living in the area or anyone willing to travel to the area has a good chance at having a lot of success. While I support harvest opportunities for the people, I do not think jeopardizing the quality of the sport fishery is worth it to eat a greyling. It is well known that greyling does not keep well if not eaten right away and it is also well known that greyling are very susceptible to over fishing. While we may not see the effects of harvesting fish the first few years, the quality of the fishery will certainly decline in time. Anyone who fishes there today has a good chance at having a good day of fishing, and I believe that recreating opportunity for the people is more important than a harvest opportunity. Greyling are not a fish that is meant to fill the freezer. I know that is not the intent here, but if everyone keeps one a day, every day they can, we will see certainly see a decline in fishing success.



Horizon West Guides and Outfitters (Sitka, Alaska)

Dear Board of Fisheries,

My name is Mark Diaz and I have spent my summers as a Charter Captain for Horizon West Guides and Outfitters in Sitka since 2009. We have a four-boat operation with a lodge that employs 12-14 seasonal workers every year. I am also in the process of taking over ownership of Horizon West, making it much more than just a seasonal "job" for me. This is now my career and sole source of income.

Historically, when a new sport fish regulation is proposed, the sport fish community is given the opportunity to review the regulation and to voice opinions and concerns on the matter. This, however, does not seem to be the case regarding Prop 176. I am not aware of any public meetings on the topic and I was only made aware of the proposal yesterday.

These are big changes to make without any public input. So, I am writing this letter to ask for more time. It is my understanding that in 2018 we came in well under our allocated numbers for King salmon harvested, which means we should be able to safely operate under the same regulations in 2019. This will give us an opportunity to properly research these changes and gauge their potential impact on our fishery and on our industry. It will also give us a chance to speak on our own behalf.

Thank You for reading.

Mark Diaz

Horizon West Guides and Outfitters

Proposal 105

I oppose this proposal because we consistently see that people are effective at catching Chinook salmon with bigger gear when other species of salmon are not running strongly yet. This would set back the sacrifices people have already made to conserve Chinook salmon by allowing higher harvest during times of conservation.

Proposal 107 and 108

I support these proposals and have combined my answer as to why. I believe that dip nets are a non-lethal gear type that allows people to harvest other sources of salmon during times of Chinook Salmon conservation. This gear should be allowed not only during times of Chinook salmon conservation but outside conservation times so that people get a chance to practice using this gear type that takes a certain amount of skill to use correctly. It would also allow people to capture smaller amount of salmon during times when not in conservation mode and where work may be a factor of not being able to work on too many salmon at once.

Proposal 109-

I have mixed feelings on this proposal, though I support it being closed until Chinook numbers are evaluated. If supported it would give the Department less control over whether to open or close marine waters adjunct to the river. I also believe that it should be closed so that low Chinook salmon numbers milling at the mouth are not captured by people who go to capture them even knowing numbers are low. People who can't afford the gas but are also following regulations when a closure is in place are getting an unfair deal with those who disregard the closure and can afford the gas to go harvest at the open waters. I would say keep it closed with the option of the Department to open should harvestable numbers indicate a harvestable surplus later in the season when other species are running as well.

Proposal 110

I do not support this proposal. I believe that five miles is too far up non salmon tributaries and makes people travel too far to get a type of fresh fish. I would say if the Board of Fish is considering supporting this proposal that they first consider asking Fish and Wildlife and Fish and Game to conduct studies on different non salmon tributaries to see if a significant amount of Chinook salmon are caught. If there is an indication that it is other salmon and not Chinook salmon that are caught that it be used as a tool to allow capture of salmon that are not in conservation mode. If it's indicated that a lot of Chinook salmon are caught, than they figure out the best buffer line that still allows for harvest of other species of fish or other species of salmon that isn't an excessive five mile buffer but more adequate for what studies like this can ascertain.

Proposal 122

I don't support this proposal. How would it be enforced? I would say if the Board is considering supporting this proposal that it also be put in subsistence regulations to make it fair to all users.

Submitted By
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1/2/2019 3:58:53 PM
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Ketchikan, Alaska 99901

Chinook Shores is a fishing lodge in Ketchikan, AK established in 2005. We operate one charter boat, nine unguided rental boats and accommodate approximately 500 individual anglers June-September.

We rely on the opportunity to catch fish to attract customers to our lodge and from June through mid-July this means king salmon. I am not convinced that proposal 176 will offer managers the flexibility needed to provide sufficient opportunity to fish for king salmon at the same or similar abundance levels as in the past.

The swift progression of proposal 176 from conception and review during the holiday season coupled with taking action at the Arctic/Yukon meeting this January has caught many stakeholders off guard. We ask the board to postpone action on proposal 176 until stakeholders have more time to thoroughly review this plan with ample opportunity for input.

The current management plan has worked well and was developed with input from a diverse group of stakeholders, which allowed us to operate our businesses without fear of triggers and regulations that could needlessly and negatively impact our businesses with little or no benefit to the resource. We wish to have the same opportunity again.

It is apparent the fisheries managers have the tools necessary to keep us within our allocation in 2019 as was done in 2018. This is an extremely important proposal, please give us more time so we get this right the first time.

Submitted By
Joel Steenstra
Submitted On
1/1/2019 2:06:32 PM
Affiliation

Phone
9079650130
Email
alaskawideopen@gmail.com
Address
PO box 1367
Craig, Alaska 99921

Commenting on proposal 176. Southeast Alaska king salmon management plan.

I am a charter operator from Craig.

As written, it would kill us to drop us down to one king salmon June 16th on low abundance years. We would lose a good part of our season. Need a three king annual limit for non-res for the month of June.

Submitted By
John Murray
Submitted On
1/1/2019 6:00:53 PM
Affiliation
self

Phone
9077386212
Email
jmfish3@gmail.com
Address
224 Observatory st.
Sitka, Alaska 99835

For BOF consideration at A,Y, K BOF meeting

Comments on Proposal 176 SE Alaska King Salmon Management Plan

Specifically related to 176 I see problems with access to King Salmon by resident harvestors in the section (g) and (h) in what one might call low abundance seasons. This will be exasperated by action taken at Jan.2018 BOF meeting in Sitka where ACTION PLANS were put in place addressing conservation concerns in the Chilkat/ King salmon and Unuk rivers. There were area and time closures instituted mostly on the inside waters of SE Alaska in May and June to protect returning spawners. If one were to add closed times in July/ August as Proposal 176 would under tiers (g)(h), residents that fish inside waters would be severely disadvantaged. The average number of low abundance seasons is around 25 percent since 2001.

General comments: As language in the Pacific Salmon Treaty is just now being made public (see news release)ADFG --New Pacific Salmon Treaty language January 1 2019. Unless the BOF is privy to detailed information about Treaty language that the public IS NOT. The BOF cannot adequately and intelligently access actions that you are asked to decide on. At this point public users are severely limited in accessing important information because of the Treaty. An example of this would be overages /underages in the sport catch of king salmon. Which is a important side issue which is related to Proposal 176. Who will have to pay back what? The CPUE is another example. That concept is new and is crucial to Proposal 176.

What I'm trying to say is Treaty is on the fast track but veiled in secrecy until yesterday The public only has had limited means to participate in an important process that will affect all king salmon harvestors for the next ten years. Proposal 176 will address the SE Alaska King Salmon Management Plan but there are a number of auxiliary issues that hang on that proposal.

I urge you to be thoughtful and careful in your deliberations. Proposal 176 is much more than housekeeping in its scope. In that it deals with allocation issues.

Sincerely John Murray Sitka Alaska.

Submitted By
Kieran gleason
Submitted On
1/2/2019 9:35:03 PM
Affiliation

Phone
9077996137
Email
Akmountainman@hotmail.com
Address
2139 pandora dr
Fairbanks , Alaska 99709

I have fished the subsistence pike fishery in the chatanika harvest area. I also have participated in other subsistence pike, sport fish, and personal use salmon fisheries around the state. Given the 2018 abundance estimate for the chatanika pike fishery (why are there not 16" fish on the table while 30" fish have large standard errors?). The population looks fine with current subsistence harvest levels. I don't think any closed areas are necessary and I fully support proposal #68 since the fishery was fine prior to 2017 season. If the biologists have a concern for this population I think the first step could be approving proposal #78 to decrease the published 10% mortality of catch and release pike by treble hook. Subsistence fishers are supposed to have a priority on this resource over sport fishers and the 30" restriction seems like a sport fish priority.

Support proposal 68,78

Oppose 63,64,65,66,67,69



Petition to Reinstate the Three Mile Closure to Subsistence Fishing for Northern Pike in the Chatanika River Harvest Area

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Printed Name	Signature	Address	Comment	Date
NANCY Kay Dieringer	Nancy Kay Dieringer	[REDACTED]		3-29-18
Bill Swift	Bill Swift	[REDACTED]		3/29/18
Becky Hassebroek	Becky Hassebroek	[REDACTED]	Would like 3 miles for 10 years!	3/29/18
JAMES F. DIERINGER	James F. Dieringer	[REDACTED]	Prefer 3 miles for 10 yrs	3/29/18
DENIS PORCHET	Denis Porchet	[REDACTED]	Would like 3 miles	3/29/18
Andre PORCHET	Andre Porchet	[REDACTED]	Would like 3 mi for 10 years	3/29/18
Candace Tucker	Candace Tucker	[REDACTED]	Would like 3 miles for 10 years	3/30/18
BILL O'MALLEY	Bill O'Malley	[REDACTED]		3/30/18
David Vick	David Vick	[REDACTED]	3 miles - 10 yrs is needed	3/30/18
Laure Trotha	Laure Trotha	[REDACTED]		3/30/18

Submitted by Marv Hassebroek

Petition to Reinstate the Three Mile Closure to Subsistence Fishing for Northern Pike in the Chatanika River Harvest Area



PC19
2 of 18

Printed Name	Signature	Address	Comment	Date
Larry Hinzman				3/31/18
Melanie Hinzman				3/31/18
LARRY A. CROUDER				4/1/18
MARVIN HASSEBROEK			NEED 3 MILE PROTECTION FOR 10 YEARS	4-1-18
KEN H. MURRAY				4-1-18
Michael A. Hopper			Let's do it	4-2-18
Trevor Smith			Protect our Native fish	4/2/2018
Chris Russell			the board should be responsible and concerned about the future	4/2/2018
MIKE BONWELL				4/2/2018
JASON RIVERS				4/02/2018
ANDREW LYAN				4/2/18
al wright			SHUT FISHING ON CHAT-	4/2/18
Ingrid Tupper				4/2/18
Dan Amundson				4/3/18
TOMMIE STERNER				4/3/18
Joan Robson			FBKS AK 99701	4-3-18



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Printed Name	Signature	Address	Comment	Date
Ryan Dick				4-4-18
John Morack			good idea!	4/4/18
BILL BUBBEL			3 MILE RESTRICTION	4/4/18
Helen C Wood			stop overfishing	4/5/18
KEN REIMER			3 MILES	4/5/18
Alfred DeCoco				4/5/18
Seth Church				4/6/18
Deb Lincoln				4/11/18
Joel Sackloris				4-11/18
Jim Brashear			I have fished it and kept 10 fish between 2 families. All 10 Female fish can't be good in retrospect	4/11/18



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Printed Name	Signature	Address	Comment	Date
DALT KOZIE				5/12/18
CARY LU				5/12/18
ROB BOSWELL				5/12/18



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Printed Name	Signature	Address	Comment	Date
Shann Jones	Shann P. Jones			4/11/18
Jeff Creamer	Jeff Creamer			4/11/18
Stan Zielinski	Stan Zielinski			4-11-18
Eric Muehling	Eric Muehling			4/11/2018
Marge Zielinski	Marge Zielinski			4/11/18
Melissa C Chapin	Melissa C. Chapin			4/11/18
Robin Brooks	Robin Brooks			4/11/2018
DARID VERBNA	Darid Verbyla			4/11/2018
Terry Chapin	Terry Chapin			4/12/2018
Leona Long	Leona Long			4/12/18



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Printed Name	Signature	Address	Comment	Date
Melna Wharton			There are plenty pike everywhere in the boat too close to urban area	4/12/18
Debbie Wighs				4-12-18
Debbie Wighs				4-16-18
Frank Ford				4-16-18
Larry Flux				4-16-18
Gerald Brown			707	4/16/18
David Gamble				4/19/18
FRED BAST			99707	4/24/18
James Paine				5/4/18
Arnold Todato				7/4/18
Beverly Floerchinger				7/8/18



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Printed Name	Signature	Address	Comment	Date
ROBERT EVERTS				5-08-18
Edgar Towler				5/12/18
Roger C. Burggraf				5/12/18
RICHARD GORSLING				5-12-18
Hollis Hall				5-12-18
Shawn McGilvary				5-12-2018
FRANK MCGILVARY			9701	5-12-18
Rodger Hopp				5/12/2018
Larry Colp				5/12/18
Silvian Chaves			Very much needed	5/12/18



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Printed Name	Signature	Address	Comment	Date
George Da Hon	George Dalton		Fairbanks AK 99701	5/12
Harold M. Hume				5.12.18
ROBIN H MCDONOUGH	Robin H McDougall		Fairbanks AK 99701	18 May '18
Timothy L Beck			Fairbanks AK 99706	5/12/18
Scott Bothwell				5/15/18
Ryan Sloger				5/15/18
Ryan Haulsten				5/16/18
Joel S. Harris	Joel S. Harris			6-8-18
KENT H. KOONTZ	Kent C. Koontz			6-8-18
Regina Herrman	Regina Herrman			6-8-18



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Printed Name	Signature	Address	Comment	Date
DAWN BRASHEAR	<i>Dawn Brashear</i>		PLEASE PROTECT PIKE POPULATIONS!	6-8-18
Robert Tucker	<i>Robert Tucker</i>		Protect Pike	6-9-18
Ken ALT	<i>Ken Alt</i>		Protect the spawners	6-9-18
Scott Mardock	<i>Scott Mardock</i>		Protect Pike	6/9/18
Clinton Summers	<i>Clinton C. Summers</i>		YES	6/9/18
JONATHAN STAMBERG	<i>J. Stamberg</i>		Protect Pike	6/9/18
Anna Berge	<i>Anna W. Berge</i>		please protect the pike + keep the fishing good for our children	6/9/18
Brigg Neibour	<i>Brigg Neibour</i>		Protect the resource	6-9-18
Robert Waller	<i>R. Waller</i>		Protect this resource!	6-9-18
Chit Connelley	<i>Chit Connelley</i>			6-9-18



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Printed Name	Signature	Address	Comment	Date
Carl Rayburn			Please protect the fish	6/9/18
Rick Stouaresky				6/9/18
Stephen Jewett				6/9/18
William B. Taylor				6/9/18
Anne Vick			More valuable as a sport fish	6/9/18
Randall Compta				6/15/18
Heather Krawiec			9	6/15/18
Christopher Larrick			9	6/17/18
Harvizon Cate				6/17/18
Harv Buddemeier				6/17/18



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Printed Name	Signature	Address	Comment	Date
Robert Schulz				6-17-2018
Fawn Wyatt				6-17-2018
Jim A. Hunter				6-17-18
John Williams				6/17/18
C. David Gerrish				6/17/18
Thomas J. Gross				6/18/18
Chris Held				6/18/18
Cody Mahon				6/18/18
Charles Pashka				6/18-18
Brian FitzSimons				6/18/18



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Printed Name	Signature			Date
CHES HODGES			3 mile protection	6/19/2018
Perzi Kelly				7/2/2018
M Lee				7/2/2018
Charles R Carr				7/2/2018
Muhammad K. Ahmed				7/5/2018
Jessie Cushing				7/2/2018
Thelma Wilkison			why not save them?	7/2/18
William Wilkison				7/2/18
William A Wilkison				7/2/18
Jeremy C Heney				7/3/18



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Printed Name	Signature	Address	Comment	Date
Nancy Murray				7/15/18
Dirk Menard				8/24/18
Mike Mavencamp				8/24/18
Debbie Wighs				9/1/18
Carrie Santoro				9/1/18
Robin Brooks				9/1/18
Steve Vick				9/1/18
Eric Wehling				9/1/18
Santosh Panda				9/1/18
NANCY JOY Nancy Joy Green				9/8/18



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Printed Name	Signature	Address	Comment	Date
GARY LINDQUIST				9-8-18
Donna Pace				9-8-18
Charles Davenport				9-8-18
HANE DSOGBESSI				9-8-18
Charles Hotila				9/8/18
Steve Hallsten				9-9-18
Marja Hallsten				9-9-17
JAMIE CLAWORTH				9-12-17
RICHARD MANSOON				9/12/17
MALEA MARKS				9-13-18



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Printed Name	Signature	Address	Comment	Date
John A. Thoms			mos. this is ruining the	9-10-18
Todd C Hallsta			ishing in Minto	9-11-18
Stephen Sauer				9-11-18
Philip Sauer				9-11-18
Audrey Ranstead				9-12-18
Robert Tison				9/12/18
Mike Kardanoff				9-14-18
CUET Froese				9-14-18
Joe Moser				9-14-18
JAMES PRENGER				10-10-18



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Printed Name	Signature	Address	Comment	Date
Lynnda Davernport	Lynnda Davernport		3 Miles for 10 yrs	9/15/18
Amanda Ross	Amanda Ross			9/18/18
Amelia Houtchens	Amelia Houtchens			9/19/18
GWEN DAVIES	Gwen Davies		3 mi or more indefinitely	
Lucy Smyth	Lucy Smyth		3 miles for 10 years	9/19/18
Pat Babcock	Patricia Rae Babcock			9/19/18
Marge Eagan	Marge Eagan			9-19-18
Agnes Govednik	AGNES Govednik			9/19-18
Vilma M. Grassi	Vilma M. Grassi			9-19-18
Mary Beth Grassi	Mary Beth Grassi			9/21/18



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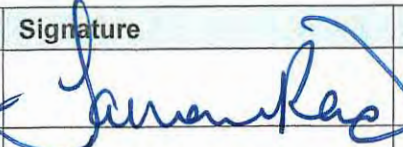

Petition summary and background	The Alaska Board of Fisheries just reduced the three mile closure that was adopted in 2017 to one mile. Fish and Game records reflect that there are almost no pike that overwinter in that first mile, and they estimate that approximately 50% of those local fish are upstream between miles 1 and 3. Almost all of the fish that are caught through the ice in this fishery are large egg-bearing females who need to be protected in order to promote the long term health of this pike fishery and habitat in Minto Flats and to prevent overfishing and rebuild the stock.
Action petitioned for	We, the undersigned, are concerned citizens who urge our Alaska Board of Fisheries to act now to reinstate the three mile restriction in the Chatanika River Harvest Area. There are reasonable opportunities throughout the Tolovana River drainage for subsistence fishing year-round. This only involves a three mile protected overwintering area for the Minto Lakes drainage.

Printed Name	Signature	Address	Comment	Date
Kristin Hancey			3 miles	9/19/18
Beverly Wright	Beverly J Wright		2	9/19/18
Marlene Wright	Marlene Wright			9/19/18
Stephanie Meath	Stephanie Meath			9/19/18
Ruth Knapp	Ruth Knapp			9/19/18
Stanley Ned				10/19/18
Dennis Benson	DJB			10/14/18
Brooks Lowe	Brooks Lowe			10/18/18
BILL	LARRY			10/19/18
Gabrielle	Larry			11/19/18



Petition to Reinstate the Three Mile Closure to Subsistence Fishing for Northern Pike in the Chatanika River Harvest Area

Petition summary and background	The Alaska Board of Fisheries just reduced the three mile closure that was adopted in 2017 to one mile. Fish and Game records reflect that there are almost no pike that overwinter in that first mile, and they estimate that approximately 50% of those local fish are upstream between miles 1 and 3. Almost all of the fish that are caught through the ice in this fishery are large egg-bearing females who need to be protected in order to promote the long term health of this pike fishery and habitat in Minto Flats and to prevent overfishing and rebuild the stock.
Action petitioned for	We, the undersigned, are concerned citizens who urge our Alaska Board of Fisheries to act now to reinstate the three mile restriction in the Chatanika River Harvest Area. There are reasonable opportunities throughout the Tolovana River drainage for subsistence fishing year-round. This only involves a three mile protected overwintering area for the Minto Lakes drainage.

Printed Name	Signature	Address	Comment	Date
TAMARA Rei				11/19/18



Submitted by: Matthew Donohoe and Ceri Malein

PO Box 3224

Sitka, AK 99835

Phone: 907-747-6255

Email: matthew_dohohoe@yahoo.com

Subject: Proposal 176.

Support for outside sport fishing not for inside sport fishing.

1/2/19

Mr. Chairman and Members of the Board of Fish;

The problem with any management scheme that sets Chinook bag limits region wide based on a single metric is that Southeast Alaska's (SEAK) local systems often produce fish inversely to the Columbia driven AI and/or the proposed CPUE method. The attached spread sheet (based on data from ADFG) demonstrates this.

On the spread sheet (Table 1) Chinook returns for local systems below the Biological Escapement Goal are shaded in salmon (pink). In an obvious example 2016 had a high pre and post season Abundance Index (AI). Under the new CPUE model (Table 2) the 2016 CPUE at 11.05 would also have been high. An 11.05 CPUE falls between a 1.805 and 2.2 AI. Both these metrics equal an Out-of-state Annual Bag Limit (OABL) of 6 Chinook. While a 6 fish OABL may have been reasonable for West Coast sport fisheries in 2016 it was problematic for escapement on inside sport fisheries and SEAK's local king salmon systems. By 2016 the Department was well aware of significant downturns in returns of Chinook to SEAK. Going forward a way must be found to raise and lower harvest rates sub-regionally. A system that considers predictions of SEAK Chinook returns when a given fishery has a high percentage of local wild fish. In other words if a poor return is expected on Alaska stocks even if the outside AI or CPUE is high then inside sport fisheries should have a lower OABL then outside and vice versa.



Data (Tables # 9, 10, 11, 12 from RC007 included) entered as RC007 by the Department at the 1/18 Sitka BOF meeting indicates that between 2005 and 2016 the **wild SEAK component of the Ketchikan sport fishery was 29%**. The AK wild component of Petersburg/Wrangell sport fishery was **44%**. The AK wild component of the northern inside sport fishery was **42%**. In contrast the AK wild component of the outside sport fishery was only **6%**¹. It seems prudent for Alaska's managers to be allowed leeway in considering effects on AK Wild stocks by setting OABs by District. It is probable that in the past an excessive OAB exacerbated already poor AK Wild runs.

In this current crises there is a problem **opening** inside waters to sport fishing near Behm Cannel and the Gravina Island western shore on **June 15**. **Average Run Timing** for the **lower Unuk River** (ADFG data attached) **doesn't begin until 6/13 and doesn't peak until 7/13**. It seems ill advised to open a fishery targeting these fish just as the run starts if the goal is to conserve them. For success in this crisis the sport fishery in this area should be delayed for at least two more weeks.

SEAK Rivers generally had good returns from 2000-2005. At that time sport harvest was consistently under allocation. In 2006, to address this, the BOF liberalized the daily bag and OAB, particularly in May and June when the AI was above 1.5. May and June are when local stocks return (ADFG's Average Run Timing graph included). In 2013, 14, 15 the Columbia River had record returns so there were big AIs. At that time a large bag limit worked for the outside sports fishing and was not harmful to SEAK stocks (6% of outside sport harvest wild SEAK kings). Inside sport fishing, however, targeted weak local wild stocks and may have contributed to record low returns. This is hard to ascertain based on CWTs. More emphasis should be placed on genetic sampling. In the Ketchikan area in 2016 and 2017 no CWTs were sampled in the sport fishery. This was in spite of over 1,000 large Chinooks turned in to the Ketchikan King Salmon Derby.

¹ These percentages are a bit off. At the time data was only available for the first 12 years of the table. Adding 2017 makes 13 years but no 2017 data could be included. The total was divided by 13 (including 2017) for the percentages.



My final concern is what happens if Alaska exceeds the agreed to, and artificially low, treaty quota. The new agreement includes more reductions even in years of record runs (such as in 2015 which was the highest since 1938 when Bonneville Dam was completed). It also now stipulates a payback for overages the following year. Is there something in the sports management plan that allows for a closures once the sport quota is caught? If so how will Sports Division, who never has before, come up with real time numbers? Will the offending gear group pay back any overages or will they come out of the all gear quota?

Tourism is increasing. The quota's too low. Not because the fish aren't available but because we unnecessarily gave up another portion of Alaska's fair share to the State of Washington. It's not low because of the cyclical downturn of SEAK's Chinook either. The large majority of SEAK's king catch (Sport and Commercial) is Snake River Fall Chinook which is doing historically well. Lower 48 Treaty people argued that point of origin (POO) is the only factor determining ownership of fish. Alaska had always argued that we have a legitimate claim to fish that spend most of their lives in Alaska waters eating Alaska forage stocks. Alaska's negotiators seemed to have abandoned that position.

Alaska is locked into this federally bullied give away for ten years. We don't know how well the Treaty mandated CPUE model will predict returning kings. There's potential for going over this ridiculous and harmful to Alaska allocation. When we do it may result in an unmanageably small quota the following year. What will managers do then?

All in all this negotiated (?) Treaty is a mess that devastates **all** Chinook dependent gear **groups** and **communities** in SEAK. That mess just fell into the Board of Fish's lap.

Yours

Matt Donohoe and Ceri Malein

Data extracted from Nov 2018 ADFG's ATA meeting handout. AK systems escapement from FMR No. 18-02
 which is the 2018 Annual Management Troll Report (2017). Columbia escapement from fpc.org

* annual bag limit from ADFG Special Publication No. 17-15

"Overview of the Sport Fisheries for King Salmon in SEAK through 2017". Presented BOF, Sitka 2018

year	Harvest	All Gear		AI		River returns							Annual bag*				day bag
		preseason	post season	Pre	Post	Situk	Alsek	Taku	Stikine	Unuk	Chilkat	Columbia	May	June	July	Aug	
1999	198,842	192,800	184,200	1.15	1.12	1,461	14,597	16,786	19,947	3,914	2,271	343,176	4	4	4	4	2
2000	186,493	189,900	178,500	1.14	1.10	1,785	7,905	34,997	27,531	5,872	2,035	491,905	2	2	3	3	2
2001	186,919	189,900	250,300	1.14	1.29	656	6,705	46,554	63,523	10,541	4,517	971,119	3	3	3	3	2
2002	357,133	356,500	371,900	1.74	1.82	1,000	5,569	55,044	50,875	6,988	4,051	924,679	3	3	3	3	2
2003	380,152	366,100	439,600	1.79	2.17	2,117	5,904	36,435	46,824	5,546	5,657	996,660	3	3	3	3	1
2004	417,019	383,500	418,300	1.88	2.06	698	7,083	75,032	48,900	3,963	3,422	906,282	3	3	3	3	1
2005	388,640	416,400	387,400	2.05	1.90	595	4,478	38,725	40,501	4,742	3,366	600,415	5	5	5	5	1
2006	360,094	346,800	354,500	1.69	1.73	295	2,323	42,296	24,405	5,645	3,039	526,538	4	4	4	4	1**
2007	328,268	329,400	259,200	1.60	1.34	677	2,827	14,854	14,560	5,668	1,442	359,675	4	4	4	4	1**
2008	172,904	170,000	152,900	1.07	1.01	413	1,885	27,383	18,352	3,104	2,905	587,428	3	3	2	1	1
2009	227,954	218,800	176,000	1.33	1.20	902	6,239	22,801	11,086	3,157	4,429	966,121	3	3	3	3	1
2010	230,611	221,800	215,800	1.35	1.31	166	9,526	28,769	15,116	3,835	1,797	902,440	3	3	3	3	1
2011	291,161	294,800	283,300	1.69	1.62	240	6,850	27,523	14,480	3,195	2,674	863,201	5	5	5	5	1**
2012	242,821	266,800	205,100	1.52	1.24	322	3,027	19,538	22,327	956	1,723	733,930	4	4	4	4	1**
2013	191,388	176,000	284,900	1.20	1.63	912	4,992	18,002	16,735	1,135	1,719	1,300,711	3	3	2	1	1
2014	435,165	439,400	374,600	2.57	2.20	475	3,357	23,532	24,360	1,691	1,529	1,339,659	6	6	6	6	1***
2015	335,026	237,000	337,500	1.45	1.95	174	5,697	28,827	21,343	2,623	2,452	1,450,683	6	6	6	6	1***
2016	350,704	355,600	288,200	2.06	1.65	329	2,504	12,000	10,343	1,502	1,373	774,144	6	6	6	6	1***
2017	178,348	209,700	215,800	1.27	1.31	1,187	1,800	7,000	10,000	1,203	1,231	555,440	3	3	3	0	1
2018	126,765	130,000 ^a	??	1.07									0	3	3	3	1
2018	126,765	144,500	??														

- A.I. above 1.5
- Below Escapement Goal
- Dismal A.I.
- 1** Bag limit is 2 in May
- 1*** Bag limit is 2 in May and June

^a 2018 pre-season harvest target reduced by 10% for SEAK/TBR wild chinook conservation.

Table 2

Accounting Year	CPUE	Preseason AI	Postseason AI	CPUE based harvest limit	PSC model 1st postseason harvest limit	CPUE underage/ overage	PreSeason PSC model Harvest limit	PSC model underage/ overage
2001	8.25	1.14	1.29	266,600	205,200	61,400	140,300	-64,900
2002	16.88	1.74	1.82	334,500	334,500	0	266,600	-67,900
2003	20.44	1.79	2.17	334,500	334,500	0	266,600	-67,900
2004	8.03	1.88	2.06	266,600	334,500	-67,900	334,500	0
2005	8.26	2.05	1.90	266,600	334,500	-67,900	334,500	0
2006	10.26	1.69	1.73	334,500	266,600	67,900	266,600	0
2007	3.38	1.60	1.34	140,300	205,200	-64,900	266,600	61,400
2008	2.30	1.07	1.01	111,800	140,300	-28,500	140,300	0
2009	3.36	1.33	1.20	140,300	140,300	0	205,200	64,900
2010	4.27	1.35	1.31	205,200	205,200	0	205,200	0
2011	6.13	1.69	1.62	266,600	266,600	0	266,600	0
2012	4.75	1.52	1.24	205,200	205,200	0	266,600	61,400
2013	4.36	1.20	1.63	205,200	266,600	-61,400	140,300	-126,300
2014	7.38	2.57	2.20	266,600	372,900	-106,300	372,900	0
2015	13.24	1.45	1.95	334,500	334,500	0	205,200	-129,300
2016	11.05	2.06	1.65	334,500	266,600	67,900	334,500	67,900
2017	4.18	1.27	1.31	205,200	205,200	0	205,200	0
						-199,700		-200,700



CPUE-based Tier	AI-based Tier	Catch Limit
Less than 2.0	Less than 0.875	Commission Determination
2.0 to less than 2.6	Between 0.875 and 1.0	111,833
2.6 to less than 3.8	Between 1.005 and 1.2	140,323
3.8 to less than 6.0	Between 1.205 and 1.5	205,165
6.0 to less than 8.7	Between 1.505 and 1.8	266,585
8.7 to less than 20.5	Between 1.805 and 2.2	334,465
20.5 and greater	Greater than 2.2	372,921



Table 9. Harvest of SEAK-origin Chinook salmon in the Ketchikan survey area sport fishery, 2005–2017.

Year	Total Harvest	SE	SEAK				SEAK Hatchery				SEAK Wild			
			Number	SE	Percent	SE	Number	SE	Percent	SE	Number	SE	Percent	SE
2005	20,300	1,541	15,756	1,320	78%	8.8%	12,328	2,004	61%	10.9%	3,428	2,400	17%	14.0%
2006	12,908	982	8,643	776	67%	7.9%	5,251	1,059	41%	8.8%	3,391	1,313	26%	11.8%
2007	13,825	1,128	10,303	933	75%	9.1%	6,601	1,492	48%	11.5%	3,702	1,760	27%	14.6%
2008	11,866	1,398	10,867	1,243	92%	15.0%	6,581	1,586	55%	14.9%	4,286	2,015	36%	21.2%
2009	23,724	3,020	20,334	2,393	86%	14.9%	13,332	2,277	56%	12.0%	7,002	3,303	30%	19.1%
2010	11,517	3,020	10,009	2,428	87%	31.0%	7,085	1,463	62%	20.5%	2,925	2,835	25%	37.2%
2011	14,388	1,608	11,348	1,270	79%	12.5%	5,629	566	39%	5.9%	5,719	1,391	40%	13.8%
2012	6,214	2,860	4,940	2,102	79%	49.8%	2,619	1,133	42%	26.6%	2,321	2,389	37%	56.5%
2013	11,972	1,143	8,548	819	71%	9.7%	5,704	469	48%	6.0%	2,844	944	24%	11.4%
2014	15,916	1,698	12,211	1,195	77%	11.1%	5,908	459	37%	4.9%	6,304	1,280	40%	12.1%
2015	13,712	1,284	8,350	852	61%	8.4%	5,042	292	37%	4.1%	3,308	900	24%	9.4%
2016	7,309	822	4,249	526	58%	9.7%	2,193	211	30%	4.4%	2,056	567	28%	10.7%
2017														
Total	163,651	6,487	125,557	5,051	77%	4.3%	78,272	4,402	48%	3.3%	47,285	6,700	29%	5.4%

Note: Shaded cells (2017) indicate estimates for which total harvest and genetic MSA results for the Ketchikan survey area sport fishery are not yet available.

Note: Total Harvest is from the statewide harvest survey. Percent SEAK is from genetic MSA and Number SEAK is calculated by multiplying Total Harvest by Percent SEAK. Number SEAK Hatchery is from CWT recovery data and Percent SEAK Hatchery is computed by dividing Number SEAK Hatchery by Total Harvest. Number and Percent SEAK Wild are calculated by subtracting SEAK Hatchery from SEAK. The Total row is either a sum (Total Harvest, Number SEAK, Number SEAK Hatchery, Number SEAK Wild) or a sum divided by Total Harvest (Percent SEAK, Percent SEAK Hatchery, Percent SEAK Wild). Where appropriate, standard errors (SE) appear to the right of an estimate.



Table 10. Harvest of SEAK-origin Chinook salmon in the northern inside survey area sport fishery, 2005–2017.

Year	Total Harvest	SE	SEAK				SEAK Hatchery				SEAK Wild			
			Number	SE	Percent	SE	Number	SE	Percent	SE	Number	SE	Percent	SE
2005	16,307	1,062	14,898	937	91%	8.3%	6,663	879	41%	6.0%	8,235	1,285	50%	10.2%
2006	12,465	1,138	11,824	876	95%	11.1%	4,696	656	38%	6.3%	7,129	1,094	57%	12.8%
2007	11,672	1,061	11,015	786	94%	10.9%	5,650	994	48%	9.6%	5,365	1,267	46%	14.5%
2008	10,974	1,107	10,420	821	95%	12.2%	5,737	852	52%	9.4%	4,683	1,183	43%	15.4%
2009	12,904	1,362	12,250	1,052	95%	12.9%	7,457	1,213	58%	11.2%	4,792	1,606	37%	17.1%
2010	10,827	1,361	10,160	888	94%	14.4%	5,401	979	50%	11.0%	4,759	1,322	44%	18.1%
2011	8,093	906	7,473	609	92%	12.8%	3,926	472	49%	8.0%	3,547	771	44%	15.1%
2012	6,599	638	6,011	474	91%	11.4%	3,550	337	54%	7.3%	2,461	582	37%	13.5%
2013	8,750	768	7,867	571	90%	10.2%	5,696	518	65%	8.2%	2,171	770	25%	13.1%
2014	7,670	897	6,291	528	82%	11.8%	3,789	411	49%	7.9%	2,502	669	33%	14.2%
2015	10,158	1,088	9,218	771	91%	12.3%	6,030	646	59%	9.0%	3,188	1,006	31%	15.3%
2016	3,983	557	3,486	356	88%	15.2%	1,712	203	43%	7.9%	1,774	409	45%	17.1%
2017														
Total	120,402	3,549	110,913	2,599	92%	3.5%	60,306	2,565	50%	2.6%	50,606	3,651	42%	4.3%

Note: Shaded cells (2017) indicate estimates for which total harvest and genetic MSA results for the northern inside survey area sport fishery are not yet available.

Note: Total Harvest is from the statewide harvest survey. Percent SEAK is from genetic MSA and Number SEAK is calculated by multiplying Total Harvest by Percent SEAK. Number SEAK Hatchery is from CWT recovery data and Percent SEAK Hatchery is computed by dividing Number SEAK Hatchery by Total Harvest. Number and Percent SEAK Wild are calculated by subtracting SEAK Hatchery from SEAK. The *Total* row is either a sum (Total Harvest, Number SEAK, Number SEAK Hatchery, Number SEAK Wild) or a sum divided by Total Harvest (Percent SEAK, Percent SEAK Hatchery, Percent SEAK Wild). Where appropriate, standard errors (SE) appear to the right of an estimate.



Table 11. Harvest of SEAK-origin Chinook salmon in the Petersburg and Wrangell survey area sport fishery, 2005–2017.

Year	Total Harvest	SE	SEAK				SEAK Hatchery				SEAK Wild			
			Number	SE	Percent	SE	Number	SE	Percent	SE	Number	SE	Percent	SE
2005	8,988	1,323	8,590	861	96%	17.0%	2,921	189	32%	5.2%	5,669	881	63%	17.8%
2006	10,972	979	10,492	713	96%	10.7%	5,711	365	52%	5.7%	4,781	801	44%	12.1%
2007	10,797	1,005	10,133	649	94%	10.6%	6,205	178	57%	5.6%	3,928	673	36%	12.0%
2008	5,669	718	5,408	440	95%	14.4%	3,237	449	57%	10.7%	2,171	629	38%	17.9%
2009	5,328	616	4,457	344	84%	11.6%	2,366	119	44%	5.6%	2,092	365	39%	12.9%
2010	3,987	616	3,637	346	91%	16.5%	1,362	92	34%	5.8%	2,274	358	57%	17.5%
2011	3,843	662	2,934	294	76%	15.2%	1,434	156	37%	7.6%	1,500	333	39%	17.0%
2012	3,679	461	3,038	276	83%	12.8%	1,424	76	39%	5.3%	1,614	286	44%	13.8%
2013	3,657	624	3,114	415	85%	18.4%	672	58	18%	3.5%	2,441	419	67%	18.8%
2014	5,214	470	4,617	336	89%	10.3%	3,015	141	58%	5.9%	1,602	365	31%	11.8%
2015	5,045	536	4,441	319	88%	11.3%	2,015	17	40%	4.3%	2,426	320	48%	12.1%
2016	6,897	635	5,739	439	83%	10.0%	3,669	147	53%	5.3%	2,070	463	30%	11.3%
2017														
Total	74,076	2,635	66,599	1,687	90%	3.9%	34,031	708	46%	1.9%	32,568	1,829	44%	4.4%

Note: Shaded cells (2017) indicate estimates for which total harvest and genetic MSA results for the Petersburg and Wrangell survey area sport fishery are not yet available.

Note: Total Harvest is from the statewide harvest survey. Percent SEAK is from genetic MSA and Number SEAK is calculated by multiplying Total Harvest by Percent SEAK. Number SEAK Hatchery is from CWT recovery data and Percent SEAK Hatchery is computed by dividing Number SEAK Hatchery by Total Harvest. Number and Percent SEAK Wild are calculated by subtracting SEAK Hatchery from SEAK. The *Total* row is either a sum (Total Harvest, Number SEAK, Number SEAK Hatchery, Number SEAK Wild) or a sum divided by Total Harvest (Percent SEAK, Percent SEAK Hatchery, Percent SEAK Wild). Where appropriate, standard errors (SE) appear to the right of an estimate.

$$\frac{47.66}{12} = 3.97$$

$$\frac{44}{13} = 3.38$$



Table 12. Harvest of SEAK-origin Chinook salmon in the outside survey area sport fishery, 2005–2017.

Year	Total Harvest	SE	SEAK				SEAK Hatchery				SEAK Wild			
			Number	SE	Percent	SE	Number	SE	Percent	SE	Number	SE	Percent	SE
2005	40,980	1,746	7,736	892	19%	2.3%	2,971	416	7%	1.1%	4,765	985	12%	2.6%
2006	49,449	2,348	6,368	1,669	13%	3.4%	2,411	1,244	5%	2.5%	3,957	2,082	8%	4.3%
2007	46,554	2,088	6,488	1,209	14%	2.7%	4,315	673	9%	1.5%	2,174	1,384	5%	3.1%
2008	20,756	1,010	7,076	702	34%	3.8%	3,146	672	15%	3.3%	3,930	972	19%	5.0%
2009	27,609	1,395	4,700	674	17%	2.6%	1,681	282	6%	1.1%	3,019	731	11%	2.8%
2010	32,172	1,597	4,304	619	13%	2.0%	2,410	238	7%	0.8%	1,894	664	6%	2.2%
2011	40,251	1,911	5,966	590	15%	1.6%	3,294	162	8%	0.6%	2,673	612	7%	1.7%
2012	30,003	1,411	6,274	650	21%	2.4%	2,662	124	9%	0.6%	3,612	662	12%	2.5%
2013	32,012	2,172	3,995	484	12%	1.7%	3,234	202	10%	0.9%	761	525	2%	2.0%
2014	58,142	2,416	3,273	445	6%	0.8%	2,189	97	4%	0.2%	1,084	455	2%	0.8%
2015	50,844	2,196	5,942	649	12%	1.4%	3,481	162	7%	0.4%	2,460	669	5%	1.4%
2016	50,158	2,483	1,929	451	4%	0.9%	2,961	142	6%	0.4%	0*	472	0%*	1.0%
2017														
Total	478,930	6,755	64,052	2,864	13%	0.6%	34,754	1,703	7%	0.4%	29,298	3,332	6%	0.7%

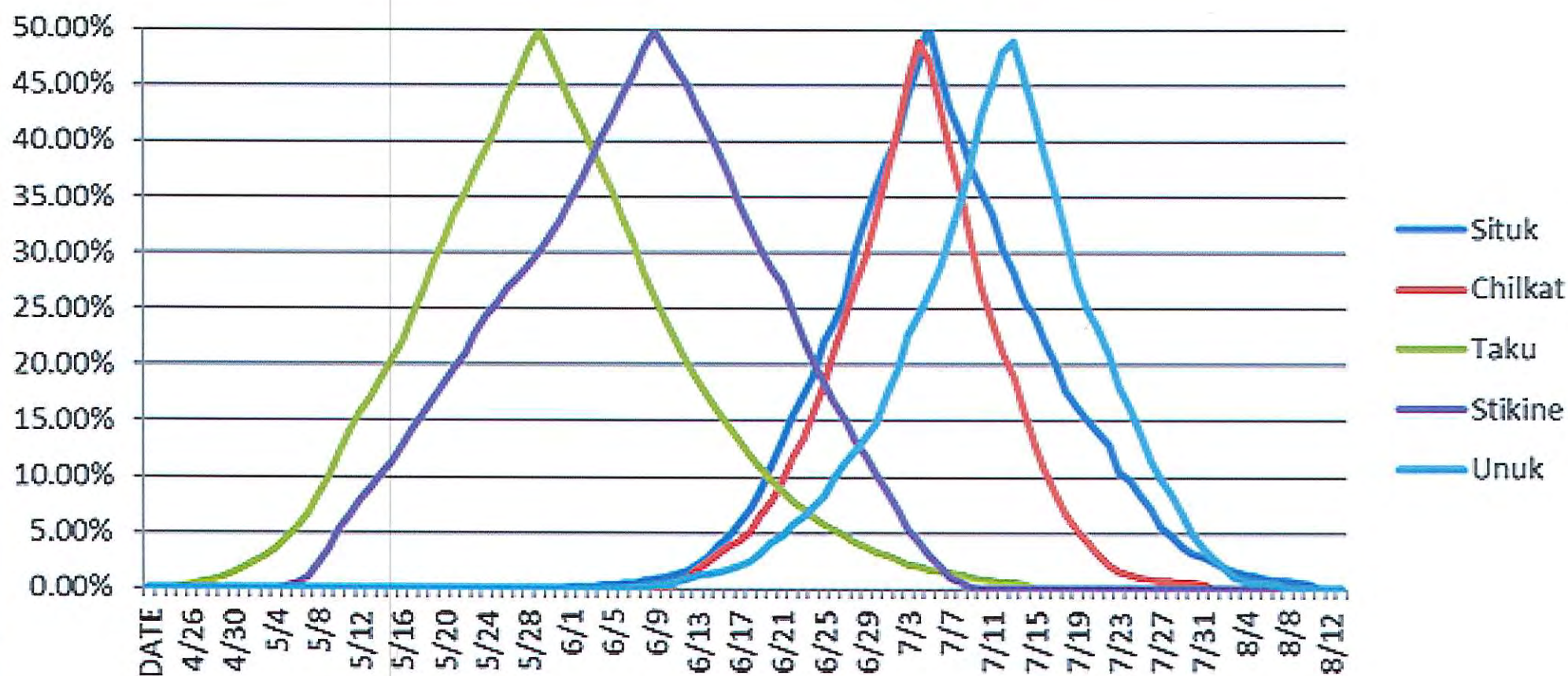
Note: Asterisks (*) indicate point estimates less than 0 that were set equal to 0; the standard error is from the original point estimate.

Note: Shaded cells (2017) indicate estimates for which total harvest and genetic MSA results for the outside survey area sport fishery are not yet available.

Note: Total Harvest is from the statewide harvest survey. Percent SEAK is from genetic MSA and Number SEAK is calculated by multiplying Total Harvest by Percent SEAK. Number SEAK Hatchery is from CWT recovery data and Percent SEAK Hatchery is computed by dividing Number SEAK Hatchery by Total Harvest. Number and Percent SEAK Wild are calculated by subtracting SEAK Hatchery from SEAK. The *Total* row is either a sum (Total Harvest, Number SEAK, Number SEAK Hatchery, Number SEAK Wild) or a sum divided by Total Harvest (Percent SEAK, Percent SEAK Hatchery, Percent SEAK Wild). Where appropriate, standard errors (SE) appear to the right of an estimate.

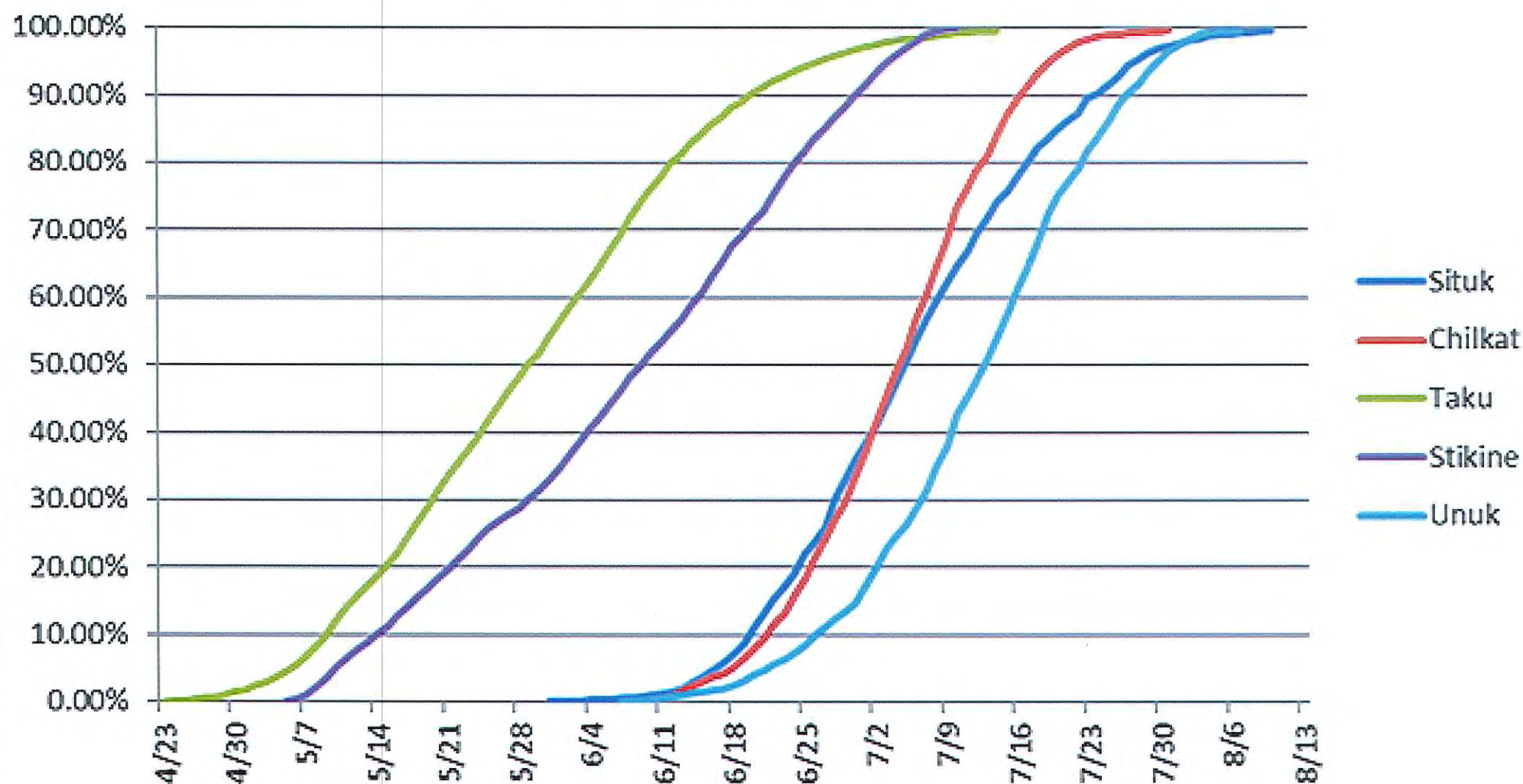


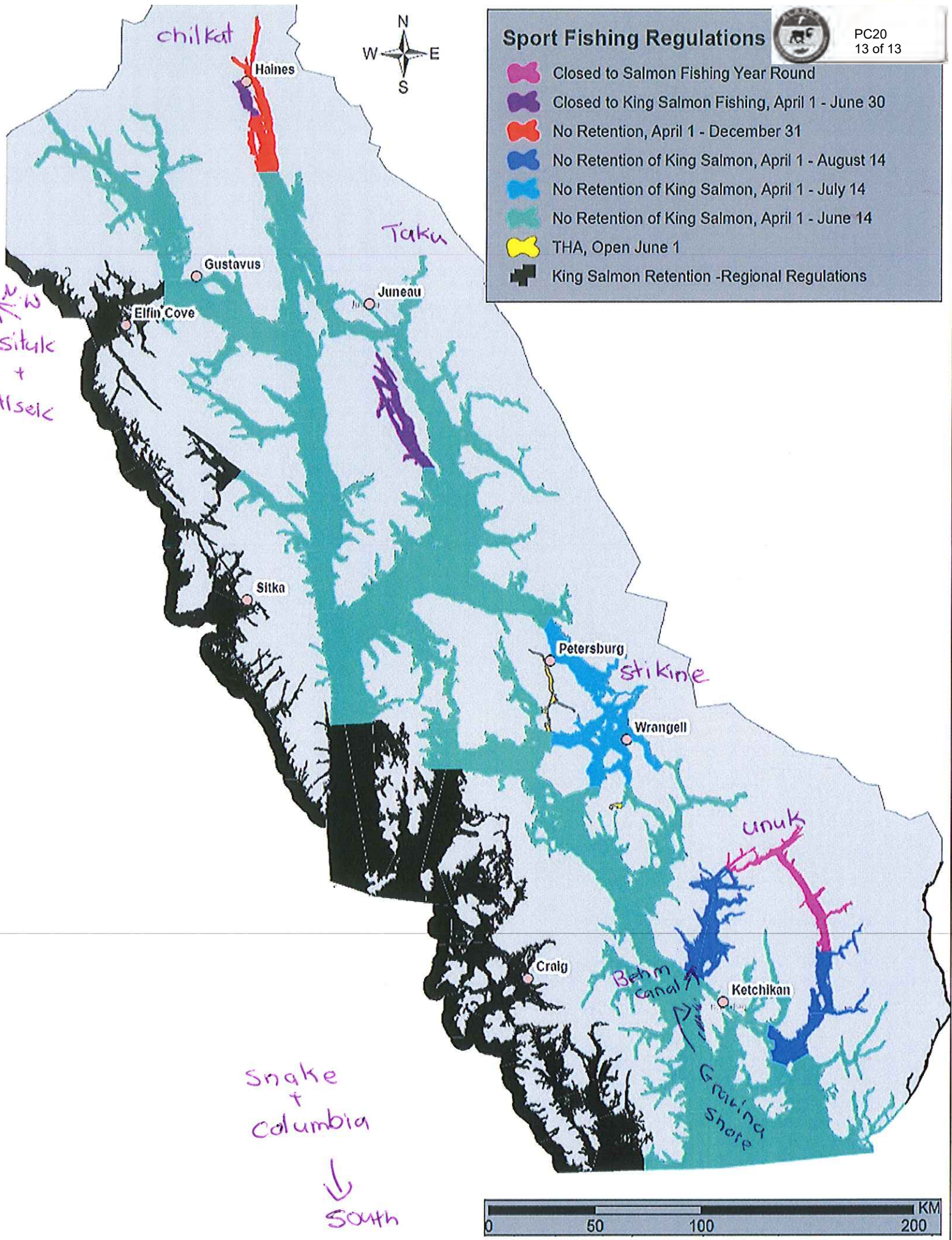
Average run timing to stock assessment projects on the lower Situk, Chilkat, Taku, Stikine, and Unuk rivers





Average run timing to stock assessment projects on the lower Situk, Chilkat, Taku, Stikine, and Unuk rivers







From: Maurice Turet
To: BOF comment on Yukon Finfish proposal 97
Subject: Wednesday, January 2, 2019 12:01:18 PM
Date:

'Divide District 2 into two subdistricts, 2A and 2B'.

There should be data provided to make a more informed decision. I suggest that the district remain intact for the upcoming season and that there be data collection to support whether or not the district should be split based on fish quality. The fisherman on the upper reaches of District 2 are already facing hardship because of the limited service from fish buyers.

--

Maurice Turet, OTC Tribal Administrator
Ohogamiut Traditional Council
PO Box 49 Marshall, AK 99585
1(907)679-6517/6598

Submitted By
Nicholas Nekeferoff
Submitted On
1/2/2019 10:19:41 AM
Affiliation

12/18/2018

Concerning proposal 177

Commissioner, Board members, and all interested parties;

My name is Nick Nekeferoff. I currently live in Sitka, Alaska. I was born in Kodiak to a fishing family and have made my living exclusively as a commercial fisherman in Alaska. In 2013, I purchased a SE drift permit and have enjoyed the opportunity this permit has afforded me. I was excited to participate in the Crawfish Inlet Terminal harvest when I began hearing of the strength of the return this past season (2018). My understanding that the intention of proposal 150 was to allow all gear groups access to an over abundance in return. This was a positive turn in my season and I was happy for my community. The expansion of area and the income it would produce would be a good thing for everyone. I was truly disappointed when I learned a miss-wording in the proposal would not allow for the gill net fleet participation. To have such a great return, an incredible over abundance of fish, and not allow the utilization, shed a poor light on our management system in my opinion. Allowing the drift gill net fleet fair participation would have brought hundreds of fisherman to Sitka with their boats needing moorage, fuel, groceries, and supplies. Bringing these fish to market would have been beneficial to many small communities in numerous ways. What a shame to have worked so hard, spent so much time and effort to see these fish return, only to let them slip passed the goal of harvest.

Proposal 177 is designed to correct this mismanagement of the fishery. I hope you will support this proposal and take the needed action to ensure fair and thorough utilization of our aquaculture in the Sitka area and around our state.

Thank you,

Nick Nekeferoff



(907) 747-6850
FAX (907) 747-1470
EMAIL steve_reifenstuhel@nsraa.org

1308 Sawmill Creek Road Sitka, Alaska 99835

Dec 7, 2018

Board of Fisheries

January 15-19, 2019
AYK Meeting Anchorage, Alaska

Re: Support for Proposal 177 Crawfish Inlet Drift Gillnet & Purse Seine Inclusion

Dear Chairman Morisky and Board of Fish Members:

The origin of this proposal is from NSRAA and was submitted and passed at the January 2018 BOF meeting in Sitka, Proposal 150 at that time in the proposal board book. My understanding based on discussions with ADF&G, was that the Crawfish Inlet THA needed a regulation change to **5 AAC 40.042** to include (a) (10) in order to allow drift gillnet common property openings. My testimony and public comments were based on that assumption. However, it turns out that an additional regulation change is required. In order to correct the error I submitted an emergency petition in October 2018 and the BOF chose to take it up at the AYK meeting as Proposal 177. NSRAA supports Proposal 177, which if adopted, would provide the NSRAA board in consultation with ADF&G, the option to have seine or gillnet openings in the Crawfish Inlet THA.

Please find attached to this letter a resolution adopted at the NSRAA board meeting of November 14&15, 2018 supporting the intent of Proposal 177 containing the language:

5 AAC 33.380. District 13: Crawfish Inlet Terminal Harvest Area Salmon Management Plan

(a) This management plan provides for the harvest of hatchery-produced king and chum salmon in the Crawfish Inlet Terminal Harvest Area by the troll, **purse seine, and drift gillnet** fisheries.

(b) The department, in consultation with the Northern Southeast Regional Aquaculture Association (NSRAA), shall, by emergency order, open and close the Crawfish Inlet Terminal Harvest Area to provide for the harvest of hatchery-produced king and chum salmon by troll, **purse seine and drift gillnet** gear.

(c) The Crawfish Inlet Terminal Harvest Area consists of the waters east of a line from 56° 44.16' N. lat., 135° 15.80' W. long., to 56° 43.30' N. lat., 135° 17.80' W. long., to 56° 41.93' N. lat., 135° 17.54' W. long., to 56° 41.14' N. lat., 135° 13.80' W. long., including the waters of Jamboree Bay, Cedar Pass south of 56° 47.14' N. lat., and Crawfish Inlet west of 135° 11.05' W. long.

Respectfully,

Steve Reifenstuhel



General Manager, Northern Southeast Regional Aquaculture Assoc.

NSRAA BOARD RESOLUTION 2018-11-15
Crawfish Inlet THA Gillnet Inclusion in 5 AAC 33.380

Whereas, the NSRAA Board initially discussed common property gear types in Crawfish Inlet THA on November 16, 2017 and voted to support adding drift gillnet and purse seine gear as options in the Crawfish Inlet THA, and

Whereas, NSRAA submitted Board of Fish Proposal 150 at the January 2018 BOF meeting in Sitka with the intention of adding drift gillnet and purse seine gear to Crawfish Inlet THA, and

Whereas, the BOF passed Proposal 150 with the intention of allowing drift gillnet and purse seine in the terminal harvest area, and

Whereas, purse seine openings in Crawfish THA were allowed in 2018, and

Whereas, in September 2018 NSRAA attempted to allow a single drift gillnet opening in Crawfish Inlet THA, but were informed by ADF&G local area management biologist that an additional regulation **5 AAC 33.380** would also need to be modified to allow drift gillnet in the terminal harvest area, and

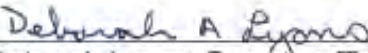
Whereas, the ADF&G Director of Commercial Fish in September 2018 re-evaluated Proposal 150 and judged it to have had the intention for drift gillnet inclusion and therefore might be considered an error or omission, and

Whereas, subsequently the Department of Law evaluated and judged Proposal 150 not to be an error or omission and, therefore requiring a change to **5 AAC 33.380**, and

Whereas, NSRAA submitted an emergency petition at the BOF Work Session in October 15-17, 2018 to align **5 AAC 33.380** with NSRAA's intentions, and the BOF agreed to hear the petition at its AYK meeting in Anchorage January 15-19, 2019,

Now therefore be it resolved, the NSRAA Board of Directors supports the emergency petition to amend **5 AAC 33.380** to allow drift gillnet and purse seine common property openings in the Crawfish Inlet THA.

Passed, Approved and Adopted by the NSRAA Board of Directors on this 15th day of November 2018


Deborah Lyons, Secretary/Treasurer
NSRAA Board of Directors

Attest:


Steve Reifensstuhl, NSRAA General Manager

2 | BOF Public Comment October '18 BOF Work Session - NSRAA

Submitted By
Robert Schwartz
Submitted On
11/26/2018 7:31:02 AM
Affiliation
Southeast Salmon Drift

To All Board Members,

I've lived in Petersburg and have been involved with the Southeast salmon fisheries my entire life. I'm writing in regard to and in favor of proposal 177 to allow all gear groups fishery access to NRSAA release site at Crawfish Inlet. This was the original intent of NRSAA proposal 150 which failed.

There are a variety of groups and many individuals working together to increase salmon production in our region as it is vital to our economy and way of life. Any new production of salmon in any area should include all gear groups out of fairness of allocation. NRSAA and the Alaska Department of Fish and Game cooperate to set fishery rotations which is a fair and efficient way to address allocation imbalances between the groups.

It is my sincere hope that you work to pass proposal 177 as it is right and just.

Thank you for your time,

Rob Schwartz



Submitted By
Russell Thomas
Submitted On
1/2/2019 4:10:20 PM
Affiliation

Phone
9076173619
Email
russelt@aseresorts.com
Address
1600 Tongass Ave
Ketchikan, Alaska 99901

Board of Fish Members:

I am writing in regards to Proposition 176, changes to the SE King Salmon Management Plan. I was part of a group of stakeholders who worked on the existing plan and remember the difficulty we had finding a consensus position among user groups. In the end, the group did an admirable job of coming up with a plan that addressed various levels of abundance, allocation between various user groups (i.e. residents vs. non-residents), and conservation burden, particularly at times of low abundance. With only a few minor tweaks, the plan has served the sportfishing community well since its implementation and is one of the reasons there is relative peace in the valley between trollers and sportfishermen.

The new Pacific Salmon Treaty annex is very different from previous annexes, and small changes to the existing plan may not adequately address the new annex. For example, there is still no clear understanding of how the payback provision in the new annex will be applied. If the sport fishermen are over their domestic allocation but Alaska is under its PST harvest ceiling, do sport fishermen owe the trollers some amount of fish the next year? Conversely, if a troll overharvest pushes Alaska over its PST harvest ceiling, are sport fishermen on the hook the following year for a reduction to meet PST obligations? In the end, these issue may be easy to sort out but to do it with limited public input or process would be a mistake.

Given the harvest in 2018 and the allocation in 2019, it appears that 2018 regulations could be implemented once again and would most likely hold the sport fishermen under their harvest ceiling of 25,800. I am respectfully requesting that the Board defer action on Prop 176, and instead direct the Commissioner to implement 2018 Chinook regulations in 2019, with authority to loosen or tighten regulations in areas dealing with stocks of concern based on catch and escapement data. Additionally, I urge the Board to reconvene the King Salmon Management Plan task force. Once reconvened, the task force could fully review the current plan and make recommendations to the Board as to how to deal with new provisions included in the 2019 treaty annex. This approach will ensure adequate public process and provide stakeholders an opportunity to develop a tool box for the Commissioner and department managers that will allow the Department to ensure conservation concerns are met while maximizing harvest opportunity for SE sport fishermen.

Regards,

Russell Thomas

Alaska Sportfishing Expeditions

Ketchikan

Submitted By
Somer Hahm
Submitted On
12/31/2018 12:13:26 PM
Affiliation
Fairbanks Resident

Regarding the proposals for the Chatanika Northern Pike Subsistence Fishery I am opposed to proposals 63-67 and 69, and I support proposal 68.

I live in Fairbanks with my husband and two young children. We highly value the pike we harvest in the Chatnika on our annual fishing trip. The meat is mild and flaky and delicious baked or fried. Pike tacos are our favorite.

Please do not restrict this fishery.



Southeast Alaska Guides Organization
1600 Tongass Avenue
Ketchikan, AK 99901

January 1, 2019

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811

Re: Proposal 176, Sport Chinook Management Plan

Dear Board of Fisheries,

The Southeast Alaska Guides Organization (SEAGO) represents charter operators, charter anglers, and lodges throughout our region. The Alaska charter industry creates at least \$100M in economic activity annually, and in Southeast generates 1,500 jobs and supports more than 400 small businesses. Guided sport fishing provides a livelihood for resident operators, their families, their employees, as well as countless service and supply businesses.

The most recent Annex of the of the Pacific Salmon Treaty presents new obstacles for guided sport operators who depend on king salmon harvest opportunity to attract customers. Proposal 176 is a first attempt at incorporating new Annex requirements into sport regulation, but SEAGO has strong concern that the proposal's minor adjustments to triggers designed to respond to old management conditions fall short of addressing all the elements and effects of a markedly different Chinook management regime.

Recent changes in the sport management environment include:

- A switch in allocation from a range to a fixed number
- Payback for overages without credit for underages
- Average allocation reductions that exceed treaty goals of 7.5% during low abundance
- Additional non-resident harvest reduction in tiers (g) and (h) in response to 80/20 burden sharing
- Circumstances that may require more flexibility than management by a rigid, pre-defined bag and annual limit framework

The current sportfish King Salmon Management Plan was developed by a diverse group of stakeholders and, with a few minor modifications along the way, has served the sport fishing



community well. Given the major changes to the provisions of the Treaty, specifically including the payback language, sport fish representatives need an opportunity to comprehensively review the current King Salmon Management Plan to determine if the existing tools still allow the Commissioner and managers adequate flexibility to achieve conservation objectives, maximize harvest opportunities for sport fishermen, and hold sport fishermen to their allocation. The Board should reconvene the King Salmon Management Plan work group and task them with the following:

- Review the new Treaty annex and its effects on the current King Salmon Management Plan
- Make suggested changes to the current King Salmon Management Plan that take into account the effects of the new Treaty Annex
- Ensure the plan allows the Commissioner and managers adequate tools and flexibility to address conservation objectives and Treaty obligations, while still maximizing angler opportunity

In its description of the regulatory development process, the Board acknowledges “the importance of public participation in developing management regulations, and recognize that public reliance on the predictability of the normal board process is a critical element in regulatory changes”. To comply with this principle, “the boards convene public meetings . . . taking department staff reports, public comment, and advisory committee and regional councils reports before voting in public session on the proposed changes”. (Joint Board Petition Policy 5 AAC 96.625)

Based on our desire to have a comprehensive review of the King Salmon Management Plan, SEAGO respectfully requests that the Board postpone action on Proposal 176 to allow more time for regional stakeholder input and analysis of options.

With respect to 2019 sport regulations, the 2019 Troll CPUE of 3.36 results in a sport allocation of 25,800 treaty fish. The existing Management Plan held the sport fleet to 21,325 treaty fish in 2018, well below the 2019 sport target of 25,800. It is our belief that current regulations, implemented by the EO authority granted to the Commissioner, are adequate to ensure the sport fleet fishes at or below its quota in 2019, providing the necessary time for a comprehensive stakeholder review of the current plan.

Sincerely,

Forrest Braden, Executive Director
Southeast Alaska Guides Organization

director@seagoalaska.org

907.723.1970



Tad Fuijoka
214 Shotgun Alley
Sitka AK 99835

Board of Fisheries Chairman Morisky:

Dec 31, 2018

Fuijoka PC:Proposal 176 – SE Sport King Salmon Management Plan

As an Alaskan resident with nearly four decades of experience sportfishing for king salmon in SE, I am compelled to speak out against some of the harmful aspects of Proposal 176.

- Prop 176 is **Not a simple “housekeeping” proposal- there are significant allocative aspects**; Prop 176 might be acceptable to charter lodge operations, but not to residents or small independent charter boats.
- **The July and early August closures doubly penalizes Alaskan residents of Juneau, Ketchikan, Petersburg, Wrangell, Hoonah, Gustavus, Tenakee, Angoon, Kake & Coffman Cove.** When the BoF adopted the Sport Option B of the Chilkat River SOC Action Plan described in RC 422 at the Jan. 2018 SE Meeting, sport king fishing in the Juneau area was closed from April 15-June 14. Department staff subsequently imposed conservation closures for the same period in all other inside waters areas due to concerns for other runs. If the BoF adopts Proposal 176 as written and imposes an allocation closure in July-August, residents of these communities will have lost virtually the entire summer season. If an allocation closure is absolutely necessary, it should occur early in the year when the inside is already closed for conservation concerns. This is when catch rates are highest so the closure could be shorter in length (a few days/wk) and limited to non-residents only while still accomplishing the management objective.

The adjacent Figure 8 (from Page 30 of *OVERVIEW OF THE SPORT FISHERIES FOR KING SALMON IN SOUTHEAST ALASKA THROUGH 2017: A REPORT TO THE ALASKA BOARD OF FISHERIES* by Robert Chadwick, et al. which was presented as Tab 9 of RC3 at the January 2018 SE BoF Meeting) shows that highest catch rate (steepest line) is in May-June. A closure in July has to be ~40% longer than a June closure to effect the same harvest reduction.

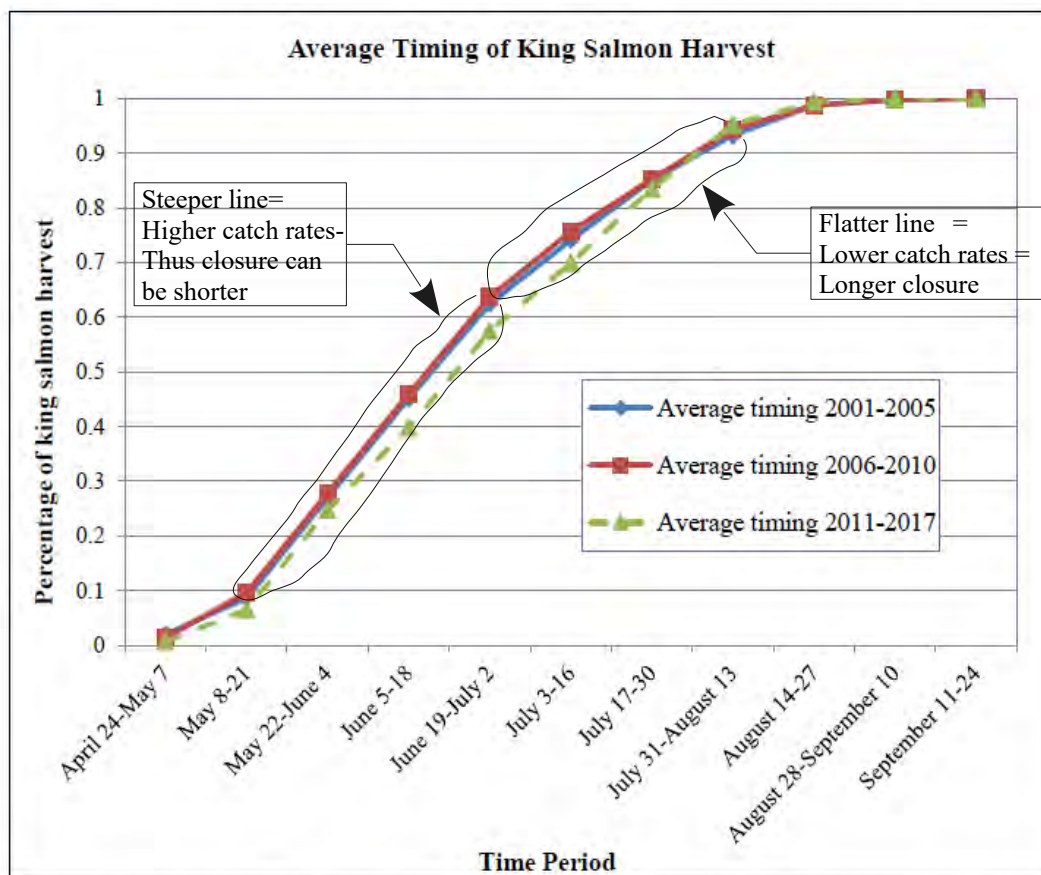


Figure 8.—Average timing of treaty king salmon harvest by 2-week periods for the Southeast Alaska marine sport fishery for 2001–2005, 2006–2010, and 2011–2017 as determined by marine creel surveys.



- **Prop 176 violates its own stated objectives:**
 - The stated objectives of both the current and proposed versions of the management plan include:
 - *allow uninterrupted sport fishing in salt water of king salmon, while not exceeding the sport fishery harvest ceiling; and*
 - *minimize regulatory restrictions on resident anglers*
 - The proposed language in (g)(1) and (h)(1) to prohibit the retention of Chinook by resident sport fishermen for 4 to 6 weeks **violates both of these objectives.**
- **The proposed July-August closure for residents violates the provision of the existing management plan** that states that when the sport fishery's harvest is to be reduced below 23,464¹, 80% of the reductions are to be borne by non-residents and only 20% by residents². The previous BoF realized the overriding importance of king salmon to local residents and prioritized their needs accordingly. Since there are no designated saltwater Subsistence Chinook fisheries in SE, locals meet their subsistence king salmon needs via the sport fishery.
- **The restrictions on Residents in Proposal 176 amounts to punishing locals for the increasing harvests of non-residents.** Growth in the non-resident sector triggered the need for the Management Plan back in 1992 and continued growth in non-resident harvest is exacerbating the need for restrictions today. The 2012-2016 resident harvest (23,064) is the same as it was back in 1988-1992 (23,110).

The adjacent Figure 6 and italicized description is from Page 24 of *OVERVIEW OF THE SPORT FISHERIES FOR KING SALMON IN SOUTHEAST ALASKA THROUGH 2017: A REPORT TO THE ALASKA BOARD OF FISHERIES* by Robert Chadwick, et al. Note that non-resident harvest has increased by a factor of 5 while resident harvest has been steady.

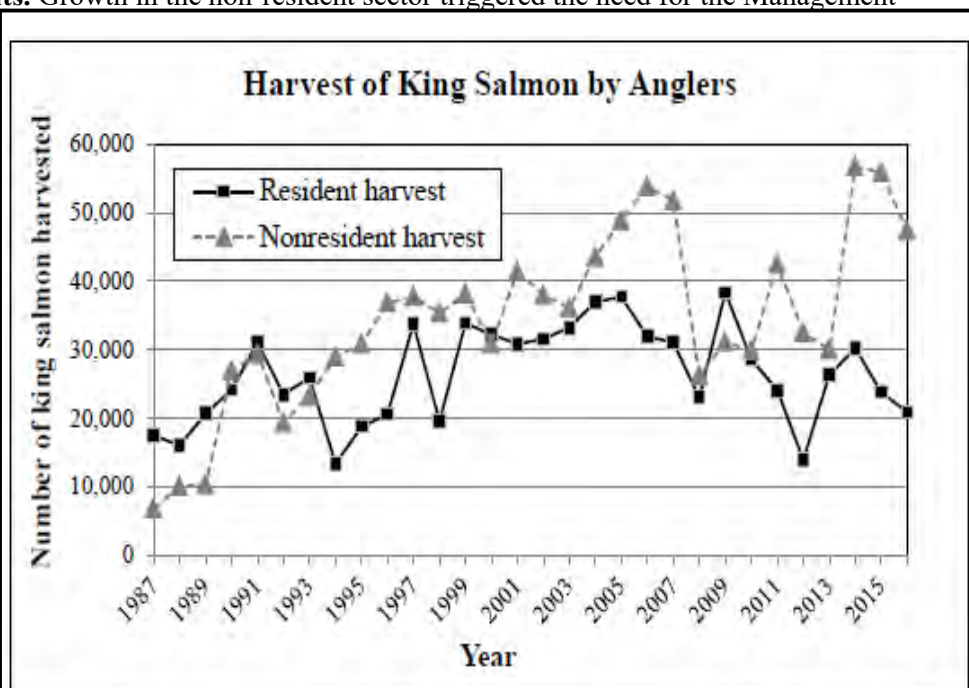


Figure 6.—Estimated harvest of king salmon by resident and nonresident anglers in Southeast Alaska, 1987–2016.

“Generally speaking, the resident harvest proportion has decreased steadily from the highest value observed in 1987 (72%) to the lowest 5-year percentage of any time period (35%) observed during 2012 to 2016.”

Tad Fujioka

- 1 This allocation of reductions is found in Section (i) of the current Management Plan and is effective when the King Salmon Abundance Index (AI) is < 1.0. Under the 2009-2018 Treaty Agreement an AI of 1.0 corresponds to an all-gear quota of 127,500 which provides for a sport allocation of 23,464. See Table 3 of *OVERVIEW OF THE SPORT FISHERIES FOR KING SALMON IN SOUTHEAST ALASKA THROUGH 2017: A REPORT TO THE ALASKA BOARD OF FISHERIES* by Robert Chadwick, et al. (This document was Tab 9 of RC3 at the January 2018 SE BoF Meeting.)
- 2 Additionally, when the Management Plan was first implemented in 1992, residents accounted for more than half of the sport take. Arguably, the intent of the BoF back in 1992 was for resident anglers to continue to realize the majority of the harvest in low quota years. Recently, the non-resident harvest has grown to about 2/3 of the sport harvest. (See Fig 6.)

Submitted By
Terry Beasley
Submitted On
1/2/2019 10:41:33 PM
Affiliation

This is in regards to Proposal 63-67 and 69. I oppose these proposals because the studies that have been done indicate that the number of fish are up from the last few years. This is going to effect the ability for me to provide for my family through the winter. My suggestion is to keep the one mile closure and keep the ten fish limit. As noted above the number of fish in this area are significantly up.

I support proposal 68.

UNITED SOUTHEAST ALASKA GILLNETTERS



PC30
1 of 1

Box 2196,

Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

January 2, 2019

Chairman Reed Morisky
Alaska Board of Fisheries

Dear Chairman Morisky and Board members,

United Southeast Alaska gillnetters support Proposal 177. Unfortunately, we thought Proposal 150 considered in January of 2018 had already accomplished this goal as our president testified "USAG supports this for the obvious reason we are included."

In talks with NSRAA management they felt that all gear groups were included as well, with "troll priority". That's why The NSRAA board submitted an ACR with a supporting resolution of near unanimous support.

Having all gear groups available to harvest at this remote release site will be a useful tool to allow NRSAA flexibility to meet the conditions of this permit. Each of the net gear types bring a certain efficiency to the table. Seines are able to catch large volumes very quickly. Gillnets are able to prosecute successful fisheries on smaller volumes due to their lower operating costs. In high abundance pink years, there could be a reduction in seine effort in the THA.

Adoption of this proposal does not create a fishery for the gillnet fleet. It merely allows for the NSRAA board to consider opportunities based on current allocation status and other opportunities for individual gear groups. We realize that only a very large return would allow serious consideration of our fleet's participation for harvest anytime soon, and any time granted us would be minimal.

It is our hope that all gear groups benefit in the long term. Adding both net groups as legal gear to the THA, with troll priority, will be a useful tool in adjusting opportunity to share enhanced fish in accordance with the Southeast Alaska Enhanced Allocation Plan going forward.

Furthermore, we feel any gear group conducting a common property fishery in a THA/SHA should be listed under that management plan.

We appreciate your serious consideration of this proposal, and the opportunity to comment.

Sincerely,

Max Worhatch, Executive Director, USAG

Submitted By
Will Prisciandaro
Submitted On
12/8/2018 2:04:47 PM
Affiliation

Phone
9073030007

Email
Wpriscia@gmail.com

Address
P.O. Box 1716
Haines, Alaska 99827

I am writing in support of proposal 177 to allow all gear types into Crawfish Inlet. This proposal will achieve what the nsraa boards intentions were at the January 2018 BOF meeting in Sitka. This proposal was supported by the nsraa board at there November 2018 board meeting and I hope that the board approves this proposal so that in the future all gear groups Can have opportunity to harvest fish in this area.

Submitted By
Yukon Delta Fisheries Development Association
Submitted On
11/14/2018 3:36:46 PM
Affiliation

Phone
907-644-0340
Email
ragnaraydf@aol.com
Address
2909 Arctic Blvd
Anchorage, Alaska 99503

Yukon Delta Fisheries Development Association requests that Proposal 97 be withdrawn from consideration by the Alaska Board of Fisheries because of a lack of public support.

PROPOSAL 97 5 AAC 05.200. Fishing districts and subdistricts. Divide District 2 of the Yukon Area into two subdistricts

**ALASKA BOARD OF FISHERIES
ARCTIC-YUKON-KUSKOKWIM FINFISH
January 15-19, 2019**

**Alaska Board of Fisheries Proposals
WRITTEN COMMENTS**

BY

Yukon Delta Fisheries Development Association (YDFDA)

JANUARY 2, 2019



Board Meeting: Arctic-Yukon-Kuskokwim (AYK) Finfish, 01/15/2019

Name: Ragnar Alstrom

Affiliation: Yukon Delta Fisheries Development Association (YDFDA)

Contact Phone: 907-644-0326

Email: ragnaraydf@aol.com

Address Line 1: 2909 Arctic Blvd.

City: Anchorage,

State: Alaska

Zip: 99503

Do you consent to your contact information being included on printed copies of your comment? Yes



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YUKON AREA SUBSISTENCE SALMON **(12 proposals: Proposals 86-96, 178)**

[View PDF of all proposals for Yukon Subsistence](#)

PROPOSAL 86 – 5 AAC 01.220. Lawful gear and gear specifications

Proposed by: Middle Yukon Advisory Committee

YDFDA Recommendation: **SUPPORT**.

ADF&G Recommendation: **the board TAKE NO ACTION**

WHAT WOULD THE PROPOSAL DO? This would allow hook and line attached to a rod or pole to be used under subsistence regulations, in addition to sport regulations to catch nonsalmon species in the Kaltag, Nulato, and Old Village (or Rodo) rivers year-round.

WHAT ARE THE CURRENT REGULATIONS? Fish, other than salmon and halibut, may be harvested under subsistence regulations by set gillnet, drift gillnet, beach seine, fish wheel, longline, fyke net, dip net, jigging gear, spear, and a hook and line attached to a rod or pole (rod and reel), handline, or lead. Rod and reel may be used to take nonsalmon under subsistence regulations in the described area, only through the ice. Rod and reel is legal subsistence gear for all fish species downstream of Paimiut Slough, which is below the community of Holy Cross.

YDFDA COMMENTS: YDFDA SUPPORTS Proposal 86.

Although YDFDA agrees with ADF&G that this proposal would add complexity to the regulations because it only specifies the use of a hook and line attached to a rod or pole when subsistence fishing for non-salmon species, YDFDA believes that this activity has been ongoing for many generations. Therefore, to reduce the complexity of the proposed regulation, we suggest that the BOARD amend this proposal to include salmon so that it is consistent with fishing with a hook and line attached to a rod or pole when subsistence fishing in the Yukon River drainage downstream from the lower mouth of Paimiut Slough. Additionally, YDFDA suggests the following change to the proposal to include these rivers:

(k) A person may use a hook and line attached to a rod or pole when subsistence fishing only

(1) in the waters between the latitude of Point Romanof and the latitude of the westernmost point of the Naskonat Peninsula, including those waters draining into the Bering Sea and those of the Yukon River drainage downstream from the [LOWER MOUTH OF PAIMIUT SLOUGH] **north bank of the mouth of Nulato River**; or

(2) through the ice.

The suggested language would include the downstream of the mouth of the Nulato River and includes the Nulato River drainage. Note that Paimiut Slough is located approximately at Yukon River Mile (RM 251). The mouth of the Nulato River is located at approximately at RM 483. Therefore, this suggested change would move the boundary for using a hook and line attached to a rod or pole when subsistence fishing to the mouth of the Nulato River, an additional distance of approximately 32 river miles.



ADF&G states in their background information:

The use of rod and reel may also be preferred for selective harvest when just a few fish are needed, and is often the preferred gear for children and young fishermen while in fish camp. Allowing rod and reel would provide Alaska residents with opportunity to harvest nonsalmon for subsistence uses without being required to purchase a sport fishing license, and opportunity to selectively harvest certain species for subsistence purposes.

This statement tends to support the passage of this proposal.

PROPOSAL 87 – 5 AAC 01.220. Lawful gear and gear specifications

Proposed by: Tanana, Ramparts, Manley, and Fairbanks Advisory Committee

YDFDA Recommendation: **OPPOSE**

ADF&G Recommendation: **NEUTRAL** on the allocative aspects; **SUPPORT** the expanded subsistence opportunity.

WHAT WOULD THE PROPOSAL DO? Allow the use of drift gillnets for subsistence fishing throughout the Yukon River.

WHAT ARE THE CURRENT REGULATIONS? Drift gillnets are only a legal gear type for harvest of salmon in Districts 1, 2, 3 and for limited dates in subdistricts 4-A, 4-B, and 4-C. Drift gillnets are not currently legal in Districts 5 and 6.

YDFDA COMMENTS: YDFDA TOOK NO ACTION on Proposal 87.

YDFDA TOOK NO ACTION and is NEUTRAL on this proposal primarily because this proposal it was out of the area that YDFDA operates. However, since the BOARD's action in March of 2018 to allow drift net fishing in 4B and 4C, the objection to the use of this gear type in the remainder of the Upper Yukon Area is somewhat mollified. ADF&G, in their comments state:

...the upper part of District 5 predominantly harvest Canadian-origin stock, they do so regardless of the gear used because that is the main stock in the area. Conversely, in District 6, Canadian-origin salmon are not typically present, so the use of drift gillnets may not have a significant biological effect on any particular stock in that district...

Therefore, the only are of concern about the harvest being comprised of more upper river king salmon stocks is in District 5 below the confluence of the Sheenjek and Chandalar Rivers. However, this shift in harvest composition may not occur because of the width of the river in District 5, the speed of the current, and king salmon migrational patterns in relation to shore. Because of river morphology and current speed and strength, the stocks may be mixed in this section of the river.



One concern remains. The efficiency of the drift gear to catch king salmon is much greater than the efficiency of set net or fish wheel gear. The increased efficiency of drift gillnet gear may result in increased subsistence harvest, especially by those fishers who sell or barter their subsistence catch. Additionally, this proposal may prompt other Alaskan residents, who currently fish with set gillnets at road-accessible point on the river, to switch to drift gillnets. This may increase harvest also. The passage of this proposal will no doubt draw other Alaskan residents, who do not live on the river, to fish with drift gillnets at road-access locations on the Yukon River, such as the bridge crossing. The possible increase in fishermen along with the increased efficiency of the gear may increase harvest to the point that additional restrictions to the king salmon subsistence fishery in all districts of the Yukon River may be necessary. Note that other roads that would provide access to the Tanana and Yukon River are or will be planned in the future. The Yukon River king salmon stock is currently fully utilized. Additionally, it is currently considered a Yield Concern. Allowing additional harvest on this stock is counterproductive to the conservative management that was initiated as early as 1998.

PROPOSAL 88 – 5 AAC 01.220. Lawful gear and gear specifications

Proposed by: Tanana, Ramparts, Manley Advisory Committee

YDFDA Recommendation: SUPPORT

ADF&G Recommendation: SUPPORT

WHAT WOULD THE PROPOSAL DO? This would eliminate any use of the livebox as an intermediate step of releasing king salmon from a fish wheel. During times of conservation when king salmon are required to be released, fish wheel users would need to bypass the livebox and be present at all times while the fish wheel was running so they could release a king salmon from the chute directly to the river (using a net, for example). Only species allowed for retention would be allowed in the livebox.

WHAT ARE THE CURRENT REGULATIONS? In subsistence regulation, during times of king and chum salmon conservation, by emergency order, fish wheels must be closely attended and king or chum salmon must be released alive immediately. A fish wheel may be operated without a live box if it is equipped with a chute that returns fish to the water alive, the operator closely attends the fish wheel while in operation, and the operator returns all king or chum salmon caught to the water alive. In commercial regulation, a fish wheel may be used in Districts 4-A and 6 but must be constructed in a manner that includes fish-friendly baskets and sides and an adjustable slide or chute that allows the immediate return of king salmon to the water, and the permit holder must be present on the wheel at all times. There is no mention of the use of a live box in commercial regulations, which means they are allowed; however, it is stipulated that king salmon be released immediately.

YDFDA COMMENTS: YDFDA SUPPORTS Proposal 88.

Current regulations



5 AAC 01.220. Lawful gear and gear specifications

(n) Notwithstanding the provisions of (d), (e)(2), and (f)(2) of this section, during times when the commissioner determines that it is necessary for the conservation of king salmon, the commissioner may, by emergency order, close the fishing season in the Yukon Area and immediately reopen the season in that area during which one or more of the following gear limitations may be implemented:

(2) for fish wheels:

(A) a fish wheel used to take fish must be equipped with a livebox that is constructed so that it contains no less than 45 cubic feet of water volume while it is in operation; the operator must closely attend the fish wheel while it is in operation, and all king salmon must be immediately released to the water alive from the livebox;

(B) repealed 5/22/2016;

(C) a person may operate a fish wheel without a livebox only if (i) the fish wheel is equipped with a chute that returns fish captured by the fish wheel to the water alive; (ii) the person closely attends the fish wheel while it is in operation; and (iii) the person returns all king salmon caught to the water alive;

5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan

(j) In Subdistrict 4-A and District 6, during times when the commissioner determines that it is necessary for the conservation of king salmon, the commissioner may, by emergency order, close the commercial set gillnet fishing season and immediately reopen the fishing season during which

(1) a fish wheel may be used; a fish wheel operated under this subsection must be constructed in a manner that includes

(A) basket sides and bottoms consisting of soft mesh material similar to or made of seine web; and

(B) an adjustable or fixed slide or chute that

(i) consists of a smooth bottom and closed cell foam lined sides; and

(ii) returns king salmon immediately to the water;

(2) the permit holder shall be present at and attend the fish wheel at all times while the fish wheel is in operation; and

(3) all king salmon caught in the fish wheel must be returned immediately to the water alive.

YDFDA agrees with the intent of the proposer and ADF&G. Additionally, the Mid Lower Yukon AC amended the proposal to specifically state that salmon of concern would be released to the water alive through either 1. a chute mechanism or 2. netting the king as it comes down the fishwheel chute. The salmon should not drop into a live or dead box from the fishwheel chute or the live box and then released. YDFDA supports adding intent language similar to the Mid-Lower Yukon AC language in the final regulation. Therefore, YDFDA specifically agrees with the department comments that support language that requires fish be released via the chute, bypassing the live box.

As stated by ADF&G in their summary of current regulations, ***“...In commercial regulation, a fish wheel may be used in Districts 4-A and 6 but must be constructed in a manner that includes fish-friendly baskets and sides and an adjustable slide or chute that allows the***



immediate return of king salmon to the water...". This language is found in 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan (j)(1)(A) and (B). YDFDA believes that these fish-friendly regulations for fish wheels should apply throughout the Yukon Area for all salmon fisheries when the conservation of any salmon requires that salmon species to be immediately release to the river alive. YDFDA suggest that appropriate regulatory language be added so that fish-friendly fish wheels are used to capture any salmon species that are required to be released to the river unharmed. There may come a time when summer chum, fall chum, or coho salmon require conservation efforts.

PROPOSAL 89-- 5 AAC 01.320. Lawful gear and gear specifications and 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan

Proposed by: John H. Lamont

YDFDA Recommendation: SUPPORT

ADF&G Recommendation: SUPPORT adding dip nets as a subsistence gear type for salmon; NEUTRAL on the allocative aspects of adding dip nets and beach seines as a legal gear in the commercial fishery

WHAT WOULD THE PROPOSAL DO? Allow retention of king salmon by emergency order in dip nets and beach seines during times of king salmon conservation in the subsistence and commercial fisheries.

CURRENT REGULATIONS: When dip nets, beach seines, and fishwheels are employed as selective gear for the conservation of king salmon, all king salmon must be released to the river unharmed.

YDFDA COMMENTS: YDFDA SUPPORTS PROPOSAL 89. YDFDA notes that although the proposer states that "... *The [below] changes to the 5 AAC 01.220 (n) (2), (3) and (4) will provide the department with a tool that would allow a relatively small harvest of king salmon when selective harvest commercial and subsistence fisheries are prosecuted...*", the proposer failed to include similar changes to the 5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan(j)(1) and (3) and 5AAC 05.362 (k)(2) for retention of king salmon in the summer chum directed dip net fishery, as follows:

5 AAC 05.362. Yukon River Summer Chum Salmon Management Plan

(j) In Subdistrict 4-A and District 6, during times when the commissioner determines that it is necessary for the conservation of king salmon, the commissioner may, by emergency order, close the commercial set gillnet fishing season and immediately reopen the fishing season during which

(1) a fish wheel may be used; **unless altered by emergency order,** a fish wheel operated under this subsection must be constructed in a manner that includes

(A) basket sides and bottoms consisting of soft mesh material similar to or made of seine web; and (B) an adjustable or fixed slide or chute that

(i) consists of a smooth bottom and closed cell foam lined sides; and



(ii) returns king salmon immediately to the water;
(3) all king salmon caught in the fish wheel must be returned immediately to the water alive **unless retention of king salmon for subsistence purposes is allowed by emergency order.**

(k) In Districts 1 - 3, during times when the commissioner determines that it is necessary for the conservation of king salmon, the commissioner may, by emergency order, close the commercial gillnet fishing season and immediately reopen a fishing season during which

(1) a permit holder may fish with

(A) up to four dip nets; notwithstanding 5 AAC 39.105(d)(24)...

(B) beach seine gear; ...and

(2) all king salmon caught in dip net and beach seine gear must be released immediately and returned to the water unharmed, **unless retention of king salmon for subsistence purposes is allowed by emergency order.**

YDFDA **AGREES** with the department's comments regarding adding dip nets as a subsistence gear type for salmon. We further agree that *"...allowing retention of king salmon in all selective gear types, i.e. dip nets, beach seines and fish wheels, by emergency order may make regulatory language within the subsistence fishery more consistent..."*.

YDFDA **DISAGREES** with the department's contention that king salmon retained, but not sold, from the dip net summer chum salmon commercial fishery is considered "personal use". First, the king salmon retained, but not sold, in the Yukon Area commercial gillnet fisheries have been reported as "subsistence" harvest by the department in all their Annual Management Reports as well as their Yukon Area Subsistence Harvest reports. Personal use salmon catches are only reported for District 6, the Tanana River, for fish taken in the Fairbanks nonsubsistence area. A permit is required to fish for personal use in the Yukon Area. Secondly, under statewide regulations regarding personal use fisheries, 5 AAC 77.001. Intent and application of this chapter, there is no mention of fish retained from commercial fisheries being considered "personal use". Thirdly, under the retention but no sale EO of king salmon in the summer chum salmon commercial gillnet fishery, the department has instructed the commercial fishermen that the king salmon caught, but not sold, in these fisheries should be taken home for "subsistence purposes" and, as noted above, those fish are included in subsistence catch totals. In conclusion, king salmon, retained but not sold in the commercial fisheries within the Yukon Area should be considered as part of the subsistence harvest.

This proposal seeks to allow retention of king salmon, under EO authority, from dip net commercial and subsistence fisheries. The no-sale but retention EO, currently employed in the summer chum salmon commercial gillnet fishery, can be similarly applied to the commercial summer chum salmon dip net fishery. YDFDA understand that this no-sale retention EO for king salmon caught in the dip net and beach seine commercial fisheries would only be allowed when the king salmon run is sufficient for escapement and directed king salmon subsistence fisheries to occur. YDFDA further understands that the subsistence priority for all Alaskan residents precludes the retention of king salmon in the commercial dip net fisheries before subsistence fishing periods are allowed, unless the inseason forecast indicates that there will be a directed subsistence fishery for king salmon.

PROPOSAL 90 – 5 AAC 01.210. Fishing seasons and periods.

Proposed by: Alissa Nadine Rogers

YDFDA Recommendation: SUPPORT AS AMENDED

ADF&G Recommendation: OPPOSE AS WRITTEN; SUPPORT providing the department with EO authority.

WHAT WOULD THE PROPOSAL DO? Reduce the subsistence closure time prior to the opening of the commercial fishing season in Yukon Districts 1-3 and Subdistrict 4-A from 24 hours to six hours.

CURRENT REGULATIONS: Current regulations require that subsistence fishing be closed for 24-hours prior to the first commercial period of the season in Districts 1-4 and the department does not have the emergency order authority to reduce this closure.

YDFDA COMMENTS: YDFDA SUPORTS PROPOSAL 90, AS AMENDED. YDFDA supports the Mid-Lower Yukon AC's amendment to this proposal that would provide the department with EO authority to reduce the closure time prior to the opening of the commercial fishing season in Yukon Districts 1-3 and Subdistrict 4-A from. The Mid-Yukon ACy amended and passed this proposal unanimously. YDFDA supports providing the department with this EO authority.

PROPOSAL 91 – 5 AAC 01.210. Fishing seasons and periods.

Proposed by: Alissa Nadine Rogers

YDFDA Recommendation: OPPOSE

ADF&G Recommendation: OPPOSE

WHAT WOULD THE PROPOSAL DO? Reduce the period of subsistence closure prior to and after commercial openings to six hours in Yukon Districts 1-3

CURRENT REGULATIONS: Current regulations close subsistence fishing before, during, and after commercial periods in Districts 1-3. The closure times before and after commercial periods vary by date range as defined in 5 AAC 01.210(e). However, the department does have emergency order authority to reduce these subsistence closures and allow subsistence fishing before, during, or after commercial fishing in order to provide more subsistence opportunity.

YDFDA COMMENTS: YDFDA OPPOSES PROPOSAL 91. The department does have emergency order authority to reduce these subsistence closures and allow subsistence fishing before, during, or after commercial fishing in order to provide more subsistence opportunity. This proposal would reduce the department's management flexibility.



PROPOSAL 92 – 5 AAC 01.220. Lawful gear and gear specifications

Proposed by: Tanana Rampart Manley Fish and Game Advisory Committee

YDFDA Recommendation: OPPOSE

ADF&G Recommendation: OPPOSE; NEUTRAL on the allocative aspects of the proposal

WHAT WOULD THE PROPOSAL DO? This would restrict gillnet mesh to a maximum of 6 inches in Districts 4, 5, and 6 for subsistence and commercial fisheries.

CURRENT REGULATIONS: Currently the maximum gillnet mesh size allowed for subsistence fishing is 7.5-inch or smaller mesh, and the department, by emergency order may restrict mesh size in the subsistence fishery in order to conserve king salmon.

In the commercial fishery, fishermen are restricted to 7.5-inch or smaller mesh gillnets for king salmon-directed fishing and 6-inch or smaller mesh gillnets for summer chum, fall chum and coho salmon-directed fishing. If a conservation concern arose for chum salmon, and the run strength for king salmon was sufficient to warrant a king-directed commercial fishery, then by emergency order, the department could require fishermen to use gillnets of 8 inches or larger.

YDFDA COMMENTS: YDFDA OPPOSES PROPOSAL 92. YDFDA **AGREES** with the department's assessment and references their comment here. Reducing mesh size to 6 inches would eliminate the directed-king salmon subsistence and commercial fisheries in Districts 4 -6. This proposal would cause a hardship for subsistence users, making it much more difficult for fishers to fulfill their subsistence needs for king salmon. Six-inch nets catch the smaller king salmon and nearly all sizes of summer chum salmon. In areas where there are large summer chum salmon runs the 6-inch net would be plugged with summer chum with few, if any catches of king salmon. In order to fulfill subsistence needs for king salmon, many more summer chum would have to be caught. This could lead to waste of the resource and/or much more salmon processing time. Additionally, any directed king salmon commercial fishery would be eliminated, even in large runs of king salmon. If the proponent believes that the large, predominantly female fish need to be further conserved, it may be more appropriate to restrict the subsistence and commercial fishery to the districts that do not have large summer chum salmon runs. However, YDFDA believes that such restrictions are not warranted and may indeed be counterproductive because of the drop-out issue..

The current maximum mesh size of 7.5-inch catches can catch all sizes of salmon but is specifically directed at the male component of the Yukon king salmon run. The maximum of the curve of the 7.5-inch gillnet mesh is coincidental to the maximum of the frequency distribution of the male component of the king salmon run. In other words, although the large female king salmon, as well as the small male king salmon, are caught in a 7.5 in gillnet, the chances are greatest for this mesh size to capture age-5 male salmon because of their size. The 7.5-inch mesh allows most summer chum salmon to swim through the net, while allowing most larger king salmon to bounce off the net and not be captured.

The department already has EO authority to alter the mesh size of nets used in the commercial and subsistence fisheries to protect king and summer chum salmon. There is no need for a maximum mesh size that would eliminate all directed king salmon fisheries in the Upper Yukon Area. Furthermore, as the department states in their comments, the potential for drop-out mortality of large king salmon when using chum salmon gear is widely reported by fishermen, and the biological effects of this are unknown.

PROPOSAL 93 – 5 AAC 01.240. Marking and use of subsistence-taken salmon

Proposed by: Alissa Nadine Rogers

YDFDA Recommendation: SUPPORT AS AMENDED

ADF&G Recommendation: OPPOSE AS WRITTEN;

WHAT WOULD THE PROPOSAL DO? Repeal the requirement to remove the tips of the tail fin of subsistence-taken salmon on the Yukon River.

CURRENT REGULATIONS: Currently in Districts 1-3, from June 1 through July 15, a person may not possess king salmon taken for subsistence uses unless both tips (lobes) of the tail fin have been removed before the person conceals the salmon from plain view or transfers the salmon from the fishing site. This regulation was enacted to reduce the possibility of subsistence-caught king salmon being sold in the commercial fishery when king salmon sales are allowed.

YDFDA COMMENTS: YDFDA OPPOSES PROPOSAL 93 as written. YDFDA SUPPORTS PROPOSAL 93, as amended. Both the Coastal Lower Yukon AC and the Mid-Lower Yukon AC amended and passed the amended proposal unanimously. The amendments by both ACs were very similar. These amendments would allow the department, via EO authority, to relax this regulation when there were no commercial sales of king salmon in the Lower River. In their comments, the department appears to agree to these amendments. YDFDA agrees with the department's approach to this proposal. The department states,

“...The department’s preferred approach to addressing this proposal is to provide management discretionary authority to require the marking of king salmon when commercial sale of king salmon is allowed. Although burdensome to subsistence fishermen, wholesale repeal of the requirement to remove both lobes of the tail fin in the subsistence fishery would create additional enforcement challenges, particularly in times when king salmon are allowed for sale. The concern for potential unlawful sale of subsistence-caught salmon in the commercial fishery persists and presents both biological and enforcement challenges.”



PROPOSAL 94 – – 5 AAC 01.2XX. New Section

Proposed by: Stanley Pete

YDFDA Recommendation: **SUPPORT**

ADF&G Recommendation: **OPPOSE**

WHAT WOULD THE PROPOSAL DO? Allow the taking of the first king salmon entering the Yukon River for religious and ceremonial use for all Yukon River Yup'ik people

CURRENT REGULATIONS: Current regulations allow subsistence fishing for salmon at all times with 7.5-inch and smaller mesh gillnets until the department restricts fishing or puts fishermen on their regulatory schedule. Subsistence harvests on the Yukon River in most districts from the coastal area to parts of Districts 5 and 6 are open to all Alaska residents; fishermen are not limited by the number of salmon they can take except in permit areas and in nonsubsistence areas of District 6.

YDFDA COMMENTS: **YDFDA SUPPORT PROPOSAL 93** YDFDA believes that ceremonial and religious traditions that involve taking of fish and game should be preserved. Suggested language for a regulation regarding this activity could be based on [5 AAC 92.019. Taking of big game for certain religious ceremonies.](#)

PROPOSAL 95 – 5 AAC 01.220. Lawful gear and gear specifications

Proposed by: Randy Mayo

YDFDA Recommendation: **YDFDA TOOK NO ACTION**

ADF&G Recommendation: **NEUTRAL**

WHAT WOULD THE PROPOSAL DO? In that portion of Yukon River District 5 between the ADF&G marker near Waldron Creek and Hess Creek (Figure 95-1), subsistence gillnet gear would require a minimum distance of 300 feet between units of gear; this would also limit the aggregate length of gillnet gear that may be deployed in an eddy to 350 feet (58.3 fathoms).

WHAT ARE THE CURRENT REGULATIONS? In District 5, subsistence fishing gear may not be set within 200 feet of other operating subsistence or commercial gear. The aggregate length of a set gillnet used for subsistence salmon fishing may not exceed 900 feet (150 fathoms). A household permit is required to subsistence fish in the area between Hess Creek upstream to the mouth of the Dall River.

YDFDA COMMENTS: **YDFDA TOOK NO ACTION on Proposal 95.** YDFDA took No Action on Proposal 95 because the proposal was out of the area that this organization operates, the proposal did not have any effect on the people that YDFDA serves, and it appears to be an

allocative issue rather than an issue based on biology or conservation.

PROPOSAL 96 – 5 AAC 01.210. Fishing seasons and periods

Proposed by: Tanana Rampart Manley and Fairbanks Fish and Game Advisory Committees

YDFDA Recommendation: OPPOSE

ADF&G Recommendation: NEUTRAL

WHAT WOULD THE PROPOSAL DO? Allow subsistence fall chum salmon fishing seven days per week in all of District 5 of the Yukon Area once a fall chum salmon commercial fishery is opened unless a biological concern arises, at which time subsistence fishing would be restricted or closed.

WHAT ARE THE CURRENT REGULATIONS? During the fall season, subsistence fishing in Subdistricts 5-A, 5-B, and 5-C is open for two 48-hour periods per week. When the department announces a commercial fishing closure that will last longer than five days, subsistence fishing is open five days per week. Subsistence fishing in Subdistrict 5-D is open seven days per week.

YDFDA COMMENTS: YDFDA OPPOSES Proposal 96. Although the department’s formal position on this proposal is Neutral, they go on to defend the current management strategy and schedule. Although YDFDA does not agree with the department’s position of Neutral, YDFDA does agree with the department’s subsequent comments. They specifically state that:

“... Adopting the proposal would reduce management flexibility. Current management practices have liberalized the subsistence fishing schedules to increase subsistence opportunity for fall chum salmon and to help alleviate the effects of the severe king salmon restrictions. However, in lower abundance years when a limited commercial surplus of fall chum salmon is identified, it may be warranted to remain on a full regulatory subsistence schedule to spread the harvest throughout the run to reduce harvest impacts on any component of the run and provide subsistence fishing opportunity along the entire river.”

YDFDA is also concerned that if this proposal passes to allow subsistence fishing 7 days a week in all of District 5, any reduction in fishing time in District 5, to spread the harvest throughout the run to reduce harvest impacts on any component of the run will be viewed as a restriction to subsistence that may unnecessarily restrict or eliminate commercial fisheries throughout the drainage.

PROPOSAL 178 – 5 AAC 01.210. Fishing seasons and periods

Proposed by: Alaska Board of Fisheries.

YDFDA Recommendation: SUPPORT

ADF&G Recommendation: SUPPORT

WHAT WOULD THE PROPOSAL DO? Allow chum salmon to be taken by drift gillnets after August 2 in Yukon River Subdistrict 4-A downstream from the mouth of Stink Creek.

WHAT ARE THE CURRENT REGULATIONS? Current regulations prohibit subsistence fishermen in Subdistrict 4-A downstream of Stink Creek from using drift gillnet gear to take chum salmon after August 2.

YDFDA COMMENTS: YDFDA SUPPORTS Proposal 178. YDFDA agrees with the department's comments and rationale.

YUKON AREA COMMERCIAL SALMON

8 Proposals: Proposals 97-104

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PROPOSAL – 97--5 AAC 05.200. Fishing districts and subdistricts

Proposed by:: YDFDA

YDFDA Recommendation: YDFDA HAS REQUESTS THAT BOF TAKE NO ACTION ON THIS PROPOSAL; IT HAS BEEN PULLED BY THE PROPOSER.

ADF&G recommendation: OPPOSE; NEUTRAL on the allocative aspects of the proposal

PROPOSALS 98 -- 5 AAC 05.331. Gillnet specifications and operations

Proposed by: John H. Lamont

YDFDA Recommendation: YDFDA took NO ACTION

ADF&G Recommendation: OPPOSE; NEUTRAL on the allocative aspects of the proposal

WHAT WOULD THE PROPOSAL DO? This would require that commercial gillnets of 6-inch or smaller mesh be limited to a maximum of 50 meshes deep, and gillnets greater than 6-inch mesh be restricted to 45 meshes deep in Districts 4-6.

WHAT ARE THE CURRENT REGULATIONS? The current commercial regulations limit the mesh depth for 6-inch or smaller mesh gear in in Districts 4-6 to 70 meshes deep. Gillnets in Districts 4-6 must be operated as set gillnet gear. Mesh depth for 6-inch or smaller mesh gear in Districts 1-3 is limited to a maximum of 50 meshes deep for drift gillnets. For commercial set

gillnets in Districts 1-3, 6-inch or smaller mesh gillnets are restricted to a maximum of 50 meshes deep.:

YDFDA Comments: **YDFDA TOOK NO ACTION** on this proposal because it is out of the area that YDFDA operates. YDFDA defers to the department and the Upper Yukon Area ACs.

PROPOSAL 99--5 AAC 05.330. Gear

Proposed by: Jaylene Fitka

YDFDA Recommendation: OPPOSE

ADF&G Recommendation: NEUTRAL

WHAT WOULD THE PROPOSAL DO? Would allow the use of beach seine gear during all commercial openings in Districts 1-3 in summer and fall seasons.

WHAT ARE THE CURRENT REGULATIONS? The current regulations allow the use of selective gear types such as beach seines and dip nets under both the king salmon management plan and the summer chum salmon management plan during times of low abundance in order to conserve one species while targeting another. For instance, in the summer season, when there is a need to conserve king salmon, the commercial fleet is limited to selective gear, and beach seines are legal, but all king salmon must be released alive (determined by emergency order.) Once the run strength warrants retention of king salmon in the commercial fishery, the department issues an emergency order that closes the selective commercial fishery and reopens the commercial season, and that requires the fleet to use gillnet gear (set and drift). Once the commercial fleet switches to gillnet gear, dip nets and beach seines are no longer legal for commercial fishing. Beach seine gear is not legal during the commercial fisheries that target fall chum and coho salmon under the management plans for those species. The CFEC limited entry permits for all commercial fishing in Districts 1-3 currently define gillnets as the only legal commercial gear.

YDFDA COMMENTS: **YDFDA OPPOSES Proposal 99.** YDFDA agrees with the Coastal Lower Yukon AC and the Mid-Lower Yukon AC that allowing beach seines to operate during gillnet openings will result in gear conflicts or preclude the use of gillnets at traditionally productive sites. This problem may also result in the fishery becoming disorderly.

PROPOSAL 100--5 AAC 05.333. Fish wheel specifications and operations

Proposed by: John H. Lamont

YDFDA Recommendation: OPPOSE

ADF&G Recommendation: OPPOSE; NEUTRAL on the allocative aspects of this proposal



WHAT ARE THE CURRENT REGULATIONS? Current regulations do not limit the size or volume of the baskets, nor the dipping depth of the baskets in the commercial and subsistence fisheries. However, during times of king salmon conservation, by emergency order, fish wheels must be attended, and all king salmon caught must be released alive. Further, fish wheels in the commercial fishery must be constructed in a manner that includes padded baskets and sides with fish-friendly chutes that allow the immediate release of king salmon.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Some commercial fishermen would need to reconstruct their fish wheels according to the specifications outlined in the proposal, which could be costly. Limiting the depth of the wheel to just six feet could eliminate the ability for the wheel to effectively harvest any species of fish, depending on the location and river geomorphology. This could impact the efficiency and catch rates for commercial fishermen. Lower quality of fish in the upper river reduces prices and markets often rely on volume of harvests. Reducing catch efficiency for commercial fishermen in the upper river could reduce harvests significantly enough that markets and buyers could be lost in this area.

YDFDA COMMENTS: YDFDA OPPOSES PROPOSAL 100. YDFDA agrees with the department's comments. There is no biological need to make fishwheels less efficient at catching salmon. The proposed modifications to fishwheels are unnecessary and could cause unnecessary harm to the subsistence and commercial fisheries that harvest fish with fishwheels.

PROPOSAL 101-- 5 AAC 05.310. Fishing seasons

Proposed by: YDFDA

YDFDA Recommendation: SUPPORT

ADF&G Recommendation: SUPPORT; NEUTRAL on the allocative aspects of this proposal

WHAT WOULD THE PROPOSAL DO? This replaces the set closure dates for all fall season commercial fisheries within the Yukon Area with a closure specified by emergency order.

WHAT ARE THE CURRENT REGULATIONS? Commercial salmon fishing seasons in Yukon Area Districts 1-5 are opened by emergency order. Commercial seasons are closed by specified dates in regulation: Districts 1-3 on or before September 1; District 4 on or before October 1 unless modified by 5 AAC 05.369; and District 5 on or before October 1. In District 6, the commercial season is closed by emergency order.

YDFDA COMMENTS: YDFDA SUPPORTS PROPOSAL 101. YDFDA agrees with the department's background discussion and comments. This proposal would provide that this proposal would allow *"... additional opportunity to harvest salmon when a surplus exists. Additionally, this would allow the department more flexibility on the termination date of the fall season commercial fisheries. This would benefit commercial fishermen by allowing them to fish longer and possibly harvest more fish during the fall season fisheries."*



PROPOSAL 102 5 AAC 05.200. Fishing districts and subdistricts

Proposed by: John H. Lamont

YDFDA Recommendation: SUPPORT

ADF&G RECOMMENDATION: OPPOSE

WHAT WOULD THE PROPOSAL DO? Include the waters of the Pastolik and Pastoliak rivers in District 1 of the Yukon Area. The proponent is seeking to allow commercial salmon fishing in both rivers.

WHAT ARE THE CURRENT REGULATIONS? The Pastolik and Pastoliak rivers are currently located within the boundaries of Yukon Area District 1 (Figures 102-1 and 102-2). Subsistence salmon fishing is allowed in both rivers and follows District 1 subsistence fishing management actions. However, the waters of both rivers are closed to commercial fishing under statewide regulations, and the waters within 500 yards around their mouths are closed to commercial fishing under both statewide regulations and Yukon Area regulations.

YDFDA COMMENTS: YDFDA SUPPORTS PROPOSAL 102. YDFDA supports the Proposal 102, 103, and 104 for the same reasons as cited below. According to local knowledge commercial and subsistence fisheries have been occurring in this area for generations. Based on local knowledge, the Black River no longer connects to the Yukon River. Sand bars along the Yukon River have closed the connections. Therefore, the department argument that commercial fisheries within the Black River occur, in part, because fish are migrating into the Yukon River is false. It appears that fish may enter, mill, and then exit the Black River much the same way as the fish do in the Pastolik and Pastoliak Rivers, evidenced by local fishers that catch fish as they exit these rivers. Extremely shallow water and the presence of numerous, persistent sandbars outside the mouth of these rivers preclude any fishing outside the mouths of these rivers. YDFDA understands the concern for stocks that may spawn in these two rivers, however these stocks should be assessed. If nothing is done, fishers who have traditionally fished within these rivers will continue to be disenfranchised from the commercial and subsistence fishery. Both Lower Yukon Area ACs supported these proposals.

PROPOSAL 103 5 AAC 05.350. Closed waters

Proposed by: John H. Lamont

YDFDA Recommendation: SUPPORT

ADF&G RECOMMENDATION: OPPOSE

WHAT WOULD THE PROPOSAL DO? Allow commercial fishing within 500 yards of the mouths of the of Pastolik and Pastoliak rivers as part of District 1 of the Yukon Area.

WHAT ARE THE CURRENT REGULATIONS? The waters within 500 yards around the mouths of the Pastolik River and the Pastoliak River are closed to commercial salmon fishing under both statewide regulations and Yukon Area regulations.



YDFDA COMMENTS: YDFDA SUPPORTS PROPOSAL 103. YDFDA supports the Proposal 102, 103, and 104 for the same reasons as cited below. According to local knowledge commercial and subsistence fisheries have been occurring in this area for generations. Based on local knowledge, the Black River no longer is connected to the Yukon River. Sand bars along the Yukon River have closed the connection. Therefore, the department argument that commercial fisheries within the Black River occur, in part, because fish are migrating into the Yukon River is false. It appears that fish may enter, mill, and then exit the Black River much the same way as the fish do in the Pastolik and Pastoliak Rivers. Local fishers have caught fish as they exit these rivers. Extremely shallow water and the presence of numerous, persistent sandbars outside the mouth of these rivers preclude any fishing outside the mouths of these rivers. YDFDA understands the concern for stocks that may spawn in these two rivers, however these stocks should be assessed. If nothing is done, fishers who have traditionally fished within these rivers will continue to be disenfranchised from the commercial and subsistence fishery. Both Lower Yukon Area ACs supported these proposals.

PROPOSAL 104 5 AAC 05.350. Closed waters

Proposed by: John H. Lamont

YDFDA Recommendation: SUPPORT

ADF&G RECOMMENDATION: OPPOSE

WHAT WOULD THE PROPOSAL DO? Allow commercial salmon fishing in the lower three river miles of the Pastolik and Pastoliak rivers, as part of the Yukon Area District 1.

WHAT ARE THE CURRENT REGULATIONS? The waters of the Pastolik and Pastoliak rivers are closed to commercial fishing under statewide regulations, and the waters within 500 yards around their mouths are closed to commercial fishing under both statewide regulations and Yukon Area regulations

YDFDA COMMENTS: YDFDA SUPPORTS PROPOSAL 104. YDFDA supports the Proposal 102, 103, and 104 for the same reasons as cited below. According to local knowledge commercial and subsistence fisheries have been occurring in this area for generations. Based on local knowledge, the Black River no longer is connected to the Yukon River. Sand bars along the Yukon River have closed the connection. Therefore, the department argument that commercial fisheries within the Black River occur, in part, because fish are migrating into the Yukon River is false. It appears that fish may enter, mill, and then exit the Black River much the same way as the fish do in the Pastolik and Pastoliak Rivers. Local fishers have caught fish as they exit these rivers. Extremely shallow water and the presence of numerous, persistent sandbars outside the mouth of these rivers preclude any fishing outside the mouths of these rivers. YDFDA understands the concern for stocks that may spawn in these two rivers, however these stocks should be assessed. If nothing is done, fishers who have traditionally fished within these rivers will continue to be disenfranchised from the commercial and subsistence fishery. Both Lower Yukon Area ACs supported these proposals.

**ALASKA BOARD OF FISHERIES
ARCTIC-YUKON-KUSKOKWIM FINFISH
January 15-19, 2019**

**Alaska Board of Fisheries Proposals
WRITTEN COMMENTS
REGARDING THE YUKON AREA BOARD OF FISHERIES
ADVISORY COMMITTEES**

BY

Yukon Delta Fisheries Development Association (YDFDA)

JANUARY 2, 2019

Board Meeting: Arctic-Yukon-Kuskokwim (AYK) Finfish, 01/15/2019

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Do you consent to your contact information being included on printed copies of your comment? Yes



Yukon Area Board of Fisheries Advisory Committees

Within the Yukon Area there are 15 Alaska Board of Fisheries (BOF) Advisory Committees (AC). These committees are distributed throughout the Yukon River drainage in Alaska from the Bering Sea Coast, represented by the Coastal Lower Yukon AC, to the U.S. Canada border on the mainstem Yukon River, represented by the Eagle AC, to the upper reaches of the Tanana River, represented by the Upper Tanana/Fortymile AC (Alaska Department of Fish and Game, Alaska Board of Fisheries, Advisory Committees by Region

<http://www.adfg.alaska.gov/index.cfm?adfg=process.acregion>. While 12.5 ACs represent the Upper Yukon Area only 2.5 represent the Lower Yukon Area. The four villages of the Grayling, Anvik, Sageluk, and Holy Cross (GASH) AC are equally divided between the two Areas, two Lower Yukon Area villages, Holy Cross and Shageluk, and two Upper River villages, Anvik and Grayling (Table 1).

Villages and Populations of the ACs

Of the 15 ACs within the Yukon River drainage, three ACs have historically not harvested more than a few Yukon River salmon and seldom, if ever, provided comments to the BOFs. These ACs include, Delta AC, Middle Nenana River AC, and Upper Tanana/Fortymile AC.

Additionally, this small harvest is not attributed to a specific village but to “other” villages and cities within Alaska in the Alaska Department of Fish and Game Subsistence reports (such as, Jallen, et. al 2017) and Yukon Area Annual Management Reports (Estensen et. al 2018) .

Additionally, because the Fairbanks North Star Borough (NSB) accounts for over 800% of the population of the villages that harvest salmon in the drainage, and also because Fairbanks NSB harvest relatively a small amount of Yukon River salmon, the Fairbanks AC has also been excluded from further consideration in this analysis.

The villages of each ACs that have a history of harvesting substantial numbers of Yukon River salmon are presented in Table 1. The number of villages represented by each AC ranges from 1 for the Eagle, Central and Ruby AC to eight for the Yukon Flats AC . There are 17 villages represented by the 2.5 Lower Yukon Area ACs, while there are 27 villages represented by the 8.5 Upper Yukon Area ACs

Although the number of Upper Yukon villages is approximately 70% greater than the number of Lower Yukon Area villages, the population of the villages of the Lower Yukon Area ACs account for 62%, of the total population of villages within the Yukon River drainage in Alaska (Figure 1). The Coastal Lower Yukon AC alone accounts for 35% of this total population. Note that there is a Joint Boards of Fish and Game proposal that proposes to move the village of Chevak from the Central Bering Sea AC to the Coastal Lower Yukon AC. If this proposal passes, then this AC will account for approximately another 1,000 residents represented by this AC. Accordingly, using the July 2017 population data (Population data taken from the Alaska.gov web page, Department of Labor and Workforce Development, Population Estimates). , the Coastal Lower Yukon AC would then account for 40% of the total population.

When deliberating proposals, the Board notes the number of ACs that support and the number that oppose each proposal. Because of difference in the primary fisheries in each Area, the Areas

are seldom aligned. Tallying the number of ACs that support and oppose the proposals doesn't present a clear picture of the will of the people. YDFDA believes that the process of simply tallying the ACs that support and oppose each proposal is markedly unfair to the residents of the Lower Yukon Area. We recommend that the Board, at least, discuss this apparent problem and create a weighting system for AC recommendations that is fair to the entire Yukon River drainage residents.

Literature Cited

- Estensen, J. L., H. C. Carroll, S. D. Larson, C. M. Gleason, B. M. Borba, D. M. Jallen, A. J. Padilla, and K. M. Hilton. 2018. Annual management report Yukon Area, 2017. Alaska Department of Fish and Game, Fishery Management Report No. 18-28, Anchorage.
- Jallen, D. M., S. K. S. Decker, and T. Hamazaki. 2017. Subsistence and personal use salmon harvests in the Alaska portion of the Yukon River drainage, 2015. Alaska Department of Fish and Game, Fishery Data Series No. 17-39, Anchorage.



Table 1. Alaska Board of Fisheries Advisory Committees, associated villages, Yukon Area District and the population estimate of each village, Yukon Area, Alaska.

	Advisory Committee	Village	Yukon Area District	Population Estimate ^a	Percent ^b
	LOWER YUKON AREA				
	Coastal Lower Yukon AC	6		4,208	35%
		Hooper Bay	Coastal	1,243	
		Scammon Bay	Coastal	573	
		Nunam Iqua	1	201	
		Kotlik	1	640	
		Alakanuk	1	706	
		Emmonak	1	845	
	Mid Lower Yukon AC	7		2,939	25%
		Mountain Village	2	811	
		Andreafski	2	na	
		Pitka's Point	2	131	
		St. Mary's	2	566	
		Pilot Station	2	651	
		Marshall	2	449	
		Russian Mission	3	331	
	COASTAL DISTRICT TOTALS	2		1,816	15%
	LOWER YUKON TOTALS ^c	2.5	13	5,572	47%

-continued-



Table 1. (p 2 of 3).

Advisory Committee	Village	Yukon Area District	Population Estimate ^a	Percent ^b
UPPER YUKON AREA				
GASH AC	4		511	4%
	Holy Cross	3	167	
	Anvik	4A	85	
	Shageluk	3	74	
	Grayling	4A	185	
Middle Yukon AC	4		967	8%
	Kaltag	4A	161	
	Nulato	4A	239	
	Koyukuk	4A	95	
	Galena	4B	472	
Ruby AC	1		170	1%
	Ruby	4C	170	
Koyukuk River AC	5		583	5%
	Huslia	4	293	
	Hughes	4	95	
	Allakaket	4	164	
	Alatna	4	22	
	Bettles	4	9	
Tanan/Rampart/Manley AC	3		391	3%
	Tanana	5	225	
	Rampart	5	54	
	Manley Hot Springs	6	112	
Minto/Nenana AC	2		573	5%
	Minto	6	201	
	Nenana	6	372	
Fairbanks AC	1		97,738	
	Fairbanks NSB	5	97,738	
	Fairbanks NSB	6		
Yukon Flats AC	8		1,336	11%
	Stevens Village	5	50	
	Birch Creek	5	21	
	Beaver	5	63	
	Fort Yukon	5	563	
	Circle	5	189	
	Venetie	5	181	
	Chalkyitsik	5	77	
	Arctic Village	5	192	
Central AC	1		88	1%
	Central	5	88	
Eagle AC	1		144	1%
	Eagle	5	78	
	Eagle Village	5	66	

Table 1 (p 3 of 3)



UPPER YUKON TOTALS^d	8.5	27	4,522	38%
FAIRBANKS NSB	1	1	97,738	
YUKON AREA TOTALS^d	8.5	40	11,910	100%

^a	July 2017 Population estimates taken from State of Alaska Dept. of Labor and			
	Workforce Dev.	http://live.laborstats.alaska.gov/pop/		
^b	Percent of the total population of villages that the AC represents that harvest or have			
	harvested salmon. Villages included are in ADF&G subsistence salmon data base.			
^c	Population data totals include the villages of Holy Cross and Shageluk that are			
	represented in the GASH AC.			
^d	Fairbanks and of AC villages that do not harvest salmon data excluded.			
	The AC excluded are: Delta AC; Upper Tanana/Fortymile AC, and Middle Nenana AC			
	Includes population estimates of Anvik and Grayling represented in the GASH AC			

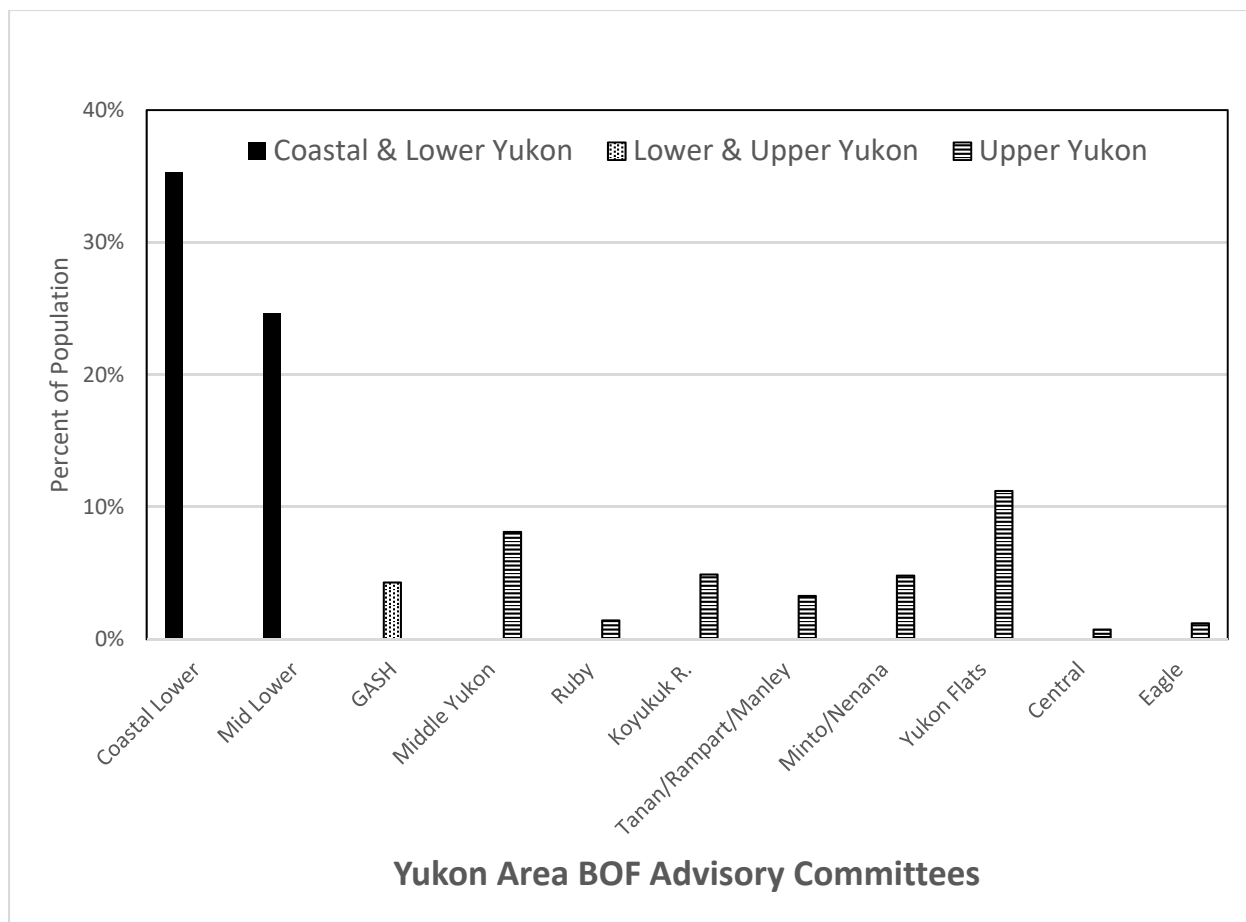


Figure 1. Percent of the total population of the villages, by Alaska Board of Fisheries Advisory Committees, that harvest substantial numbers of salmon, Yukon Area, Alaska. (Population estimates taken from Alaska Department of Labor and Workforce Development, Research and Analysis July 2017, <http://live.laborstats.alaska.gov/pop/>.)



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

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Yukon River Drainage Fisheries Association comments to the Alaska Board of Fish 2019 Yukon River Proposals

The Yukon River Drainage Fisheries Association (YRDFA) is a 501 (c) (3) non-profit association of subsistence and commercial fishers with a mission of protecting and promoting all wild fisheries and traditional cultures within the Yukon River drainage.

The Yukon River is home to the longest salmon migration in the world. These salmon provide key dietary and cultural support for over forty-two rural Alaskan villages. For many families, the commercial salmon harvest provides the only means of income, and salmon provides a primary source of food for humans and the sled dogs that are integral to their subsistence way of life.

YRDFA was created in 1990 to conserve these salmon runs by giving a voice to the people who have managed the resource for thousands of years. YRDFA has become an essential part of the communications between fishers and fishery managers in this region. YRDFA represents village fishers at important state, federal and international decision-making tables, works to document and utilize Traditional Ecological Knowledge in fisheries management and strengthens the long-term economic viability and sustainability of Yukon River communities through preserving subsistence fisheries and enhancing commercial fisheries.

Please note that the YRDFA Board is comprised of 16 Yukon River fishermen & women, having representation from the full length of the Yukon River in Alaska, which makes decisions by full consensus. An abstention does not constitute a no vote. A single no vote does decide a position.

Board of Fish 2019 Proposals

Proposal 86 – Allow subsistence fishing for non-salmon fish with hook and line gear in District 4 during ice-free times of year – SUPPORT with amendments

YRDFA suggests: Extend this regulation to all remaining districts (4-6) for customary and traditional use only.



Observations:-

- *Fishers have long used this as a traditional harvest approach for subsistence, different from the practice of sport fishing.*
- *Intent is to decriminalize existing traditional practices.*
- *Supports fishers feeding their families and others.*

Proposal 87 – Allow subsistence fishing for salmon with drift gillnets in the entire Yukon River - OPPOSE

Proposal 88 – Require fish wheels to be closely attended during times of conservation for any species - OPPOSE/no consensus

Reason: YRDFA board did not reach consensus on this proposal due to some members feeling there was not enough detail on species, time, and a description of live boxes.

Proposal 89 – allow retention of King salmon for subsistence purposes, by emergency order, during times of King salmon conservation – SUPPORT

YRDFA suggests: For subsistence fishery only

Proposal 90 - Reduce the amount of time when subsistence fishing is closed before the first commercial fishing period of the season – SUPPORT

Observation: This regulation was intended to limit the ability for people to sell their subsistence-caught fish in the commercial fishery. This practice is of no or very little concern in current years and the 24 hour closure is unnecessary.

YRDFA suggests: Allow the in-season manager the flexibility to determine the duration of the closure on a case-by-case basis annually.

Proposal 91 - Reduce the amount of time prior to opening of each commercial fishing period in Districts 1-3 of the Yukon Area when subsistence fishing for salmon is prohibited. OPPOSED

Observation: ADFG managers presently have the flexibility to adjust closure periods between subsistence and commercial fishing periods.



Proposal 92 - Restrict gillnet mesh size to a maximum of 6 inches in Districts 4, 5, and 6 subsistence and commercial salmon fisheries. OPPOSED

Observation: Fishing challenges vary across the districts creating the need for flexibility in gear types. We understand the intent here of targeting smaller King salmon in times of conservation when openings occur for allowing larger fish to survive and reach the spawning grounds. Fishers in Districts 4-6, or within any other fishing district for that matter, can choose to use smaller gear presently. We encourage ADFG to address the question of whether the present approach and escapement goals are adequate for protecting the larger, more fecund females for rebuilding the King salmon run. Most fishers believe getting as many as possible, large females to the spawning grounds is the only way to increase productivity. If this is not the case, then fishers need to understand why.

Proposal 93 - Repeal the requirement to remove the tips of the tail fin of subsistence-taken salmon in Districts 1 – 3 of the Yukon Area. SUPPORT

Observation: as there are presently no commercial sales of King salmon this practice is unnecessary and an extra burden on subsistence fishers.

Proposal 94 - Allow the taking of the first king salmon entering the Yukon River for religious and ceremonial use. SUPPORT

YR DFA suggests: apply to the entire river rather than simply the Yupik peoples communities.

Observation: Requests for fish (not simply first fish) memorial potlatches are presently allowed on a case by case basis. ADFG will need to define the circumstances and size of harvest and perhaps other factors for addressing requests from communities.

Proposal 95 - In the Yukon River between the marker at Waldron Creek and Hess Creek, require a minimum distance of 300 feet between units of set gillnet gear and limit the amount of net gear that may be deployed in an eddy to 350 feet. SUPPORT

Observation: whether this will address the issue of crowding and assist local folks in meeting their subsistence needs remains to be seen. This approach should be tried,

observed and fine-tuned for resolving the growing user conflicts in the area of the Yukon River bridge.



Proposal 96 - Allow subsistence fishing for fall chum salmon in District 5 without time restrictions if commercial fishing for fall chum salmon is open in other Yukon River districts. SUPPORT

Observation: This approach must of course be tied to confidence in meeting escapement goals.

Proposal 97 - Divide District 2 of the Yukon Area into two subdistricts

We understand that this Proposal was pulled by the proponent. In discussion our lower river fishers were not supportive.

Proposal 98 - Decrease gillnet depth in Districts 4–6 of the Yukon Area. OPPOSE

Proposal 99 - Allow use of beach seine gear to harvest salmon during open commercial fishing periods in Districts 1 – 3 of the Yukon Area. OPPOSED

Observation: Our lower river fishers were not supportive of this proposal.

Proposal 100 - Adopt maximum size and depth restrictions for fish wheel baskets. OPPOSED

Proposal 100 – Adopt maximum size and depth restrictions for fish wheel baskets in the commercial fishery – OPPOSED

Proposal 101 - Open and close the commercial fishery for fall chum and coho salmon in the Yukon Area by emergency order. OPPOSED.

Observation: YRDFA believes ADFG managers have this ability already.

Proposal 102 Include the Pastolik and Pastoliak Rivers in District 1 of the Yukon Area

Proposal 103 Repeal closed waters within 500 yards of the mouth of the Pastolik River and the Pastoliak River

Proposal 104 Repeal closed waters in the lower three miles of the Pastolik and Pastoliak rivers



PC33
5 of 5

They would like to allow commercial fishing in both rivers like the Black River.

YRDFA SUPPORTS Proposals 101, 102 & 103.

Observation: YRDFA supports the fishers of Kotlik's proposals which improves efforts for meeting their subsistence needs, close to home. We would like ADFG to travel to Kotlik to meet with the people and work to determine their traditional use of these areas and to address any biological knowledge gaps associated with these changes and effects on Yukon River fisheries, if any.

Yukon River Inter-Tribal Fish Commission Decisions on Board of Fisheries Proposals, AYK Meeting, January 2019

Background

The Yukon River Inter-Tribal Fish Commission (Commission) was founded on tribal unity for the health and well-being of Tribal members, future generations, and all who rely upon the health of the Yukon River fisheries. The Commission recognizes the responsibility and authority of Tribes and First Nations to exercise their tribal rights as stewards to their traditional territories and resources. The Commission is committed to conserving, restoring, and providing for tribal use of fisheries based on indigenous knowledge systems, scientific principles, and sound management. To date, over 30 federally recognized Tribes along the Yukon River have joined the Commission and ratified the Commission's constitution, from Alakanuk at the mouth to Eagle at the Canadian border.

Proposal Decisions

The Yukon River Inter-Tribal Fish Commission met December 4-6, 2018 to vote on the Yukon River-specific Board of Fisheries (BOF) proposals being considered at the AYK January 2019 BOF meeting. Quorum was established with 17 Fish Commissioners present, with at least one Fish Commissioner from each of the six sub-regions (based on ADFG management district boundaries: Coastal/Y1, Y2 and Y2, Y3 and Y4, Y5, Y6, and Koyukuk and Innoko R). Also in attendance were the elder advisor and youth advisor. **The Fish Commission passes resolutions and votes based on unanimous consent.**

Summary of Actions

Proposal #	Proposal summary	Action
86	Allow subsistence fishing for non-salmon fish with hook and line	Support
87	Allow drift gillnets in the entire Yukon River drainage	Oppose
88	Require immediate release of king salmon from fish wheels	Support
89	Allow retention of king salmon from selective gear types	Support, as amended
90	Reduce subsistence fishing closure before 1 st commercial	Support, as amended
91	Reduce closure before, during, and after commercial	Oppose
92	Restrict Districts 4-6 to max gillnet size of 6-inch	Oppose
93	Repeal the requirement to remove tips of tails for subsistence	Support, as amended
94	Allow the taking of first king salmon entering the Yukon River	Support, as amended
95	Increase distance between gear, limit gear length near Yukon bridge	Support, as amended
96	Allow subsistence fishing 7 days a week in District 5 if commercial fishery is open	Support, as amended
97	Divide district 2 (being pulled by proponent at meeting)	No action
98	Decrease depth of gillnets in Districts 4-6	Oppose
99	Allow use of beach seine gear for all commercial openings	Oppose
100	Adopt a maximum size and depth for fish wheel baskets	Oppose
101	Open and close the commercial fishery for fall chum and coho by EO	Support
102/103/104	Open portions of the Pastolik and Pastoliak Rivers to fishing	Support (all three)



Proposal 86 – Allow subsistence fishing for non-salmon species with hook and line gear in the Kaltag, Nulato, and Old Village (or Rodo) rivers during ice-free times of the year.

Fish Commission vote: Unanimously support as amended

Proposed amendment: Extend this proposed regulation change to all remaining districts on the Yukon River, with the intent that this would be for customary and traditional use only.

Why the Fish Commission supports as amended:

- Currently, fishermen may harvest non-salmon species for subsistence using hook and line gear through the ice. Additionally, fishermen residing below Paimiut Slough are allowed to use rod and reel for subsistence gear to harvest non-salmon species year-round.
- This is a documented and traditional practice for subsistence fishermen throughout the river drainage, with many participating year-round. It is a popular activity at fish camp, and families will often fish together during down times at camp. Fishermen report that being able to use rod and reel gear to harvest non-salmon species helps them put food on the table and have fresh fish. The practice of using rod and reel to harvesting non-salmon species year-round for subsistence purposes is so common, that many of our Fish Commissioners were actually surprised to learn it was not currently legal in the entire drainage.
- If this regulation were extended to the entire Yukon River drainage and was designated for customary and traditional use only, the Fish Commission does not believe there would be an increased harvest or increased pressure on any of the non-salmon species being targeted. The intent of this proposal is not to increase harvest; the intent is to decriminalize an already widely-practiced tradition.
- While fishermen can currently fish for non-salmon species using rod and reel during ice-free months by purchasing a resident sport fishing license, not every community has a place where they can easily purchase a sport-fishing license and purchasing a license online is not feasible as many fishermen do not have access to wifi, printers, or email to purchase online.

Proposal 87 – Allow subsistence fishing for salmon with drift gillnets in the entire Yukon River

Fish Commission vote: Unanimously oppose

Why the Fish Commission opposes:

- The Fish Commissioners are concerned that more non-local residents would participate in the fishery because of ease-of-access at several roads (not an issue in Districts 1-4, where drift gillnetting is currently allowed) and that additional and new fishermen would put more pressure on the stocks. Currently, set nets are allowed, which require knowledge of

the river and in many cases, traditional family fishing spots, limiting how many people can access and fish the river.

- As other areas of the state become closed like they did this year (e.g. Copper River – a popular personal-use fishery for urban residents from Fairbanks), people may start coming to the Yukon to fish if they can easily use drift gillnets.
- The Tribes of Tanana, Rampart, Manley, Beaver, Fort Yukon and Eagle were specifically consulted by the Fish Commissioners and all opposed drift gillnet fishing in their area at this time.
- Upriver Fish Commissioners noted that not many people in their region would not even use this gear type, so it would only be creating a new fishery for non-local fishermen.
- If drifting is allowed, then ADFG may decide to reduce fishing times because of the efficiency of this gear type, which would be hugely detrimental to folks still using setnets and fish wheels.
- If there is a concern in Tanana such that fishermen are unable to currently meet their subsistence needs using stationary gear only, then they should make their case for the need for drift gillnets in a localized area. The Fish Commissioners understand the concerns about climate change impacting the ability to harvest – that is definitely affecting everyone. A lot of people, even in their setnet spots, had a hard time catching fish – lot of families who did not meet their needs, but not because of the gear they are using – rather the runs are lower than historical sizes and there are more fishing restrictions. The Fish Commissioners have not been hearing many people wanting to change their gear type in the upriver areas.
- Fish Commissioners from the districts where drift gillnets are currently not allowed report that drifting is not their traditional way of fishing and they have no concerns with current methods of fishing. Many agreed that this is simply not a gear type that would even be feasible for fishermen to use effectively and without considerable difficulty in subdistrict 5-D and District 6.
- There were concerns that using drift gillnets could be a safety issue in many of these areas where the water is shallower and there are a lot of snags.

Proposal 88 – Require immediate release of king salmon from fish wheels (no liveboxes allowed) during times of king salmon conservation

Fish Commission vote: Unanimously support

Why the Fish Commission supports:

- Currently, liveboxes are allowed during times of king salmon conservation and king salmon may go in to a livebox, but must be released immediately. There are studies showing any time in a livebox is stressful to king salmon and could be detrimental to their migration and spawning success. Eliminating a livebox and truly releasing king salmon immediately so they can go and spawn would increase their chances of surviving, which is the entire point of using this gear type during times of conservation.



- Because fishermen in subdistrict 5-D get closed down in conservation mode (they do not have live-release fish wheels, nor do they have other species they could target with live-release wheels), then throwing kings back immediately is the least other districts can do to conserve.
- Because other selective gear types (dip nets and beach seines) used during times of king salmon conservation are required to release the king salmon immediately – don't get to hold them – fishwheels should also release immediately.

Proposal 89 – Allow retention of king salmon (from selective gear types – dip nets, beach seines, and live-release fish wheels) for subsistence purposes, by emergency order, during times of king salmon conservation.

Fish Commission vote: Unanimously support as amended

Proposed amendment: Allow retention of king salmon from selective gear types during subsistence salmon fishing openings only – do not allow in the commercial fishery.

Why the Fish Commission supports as amended:

- The Fish Commission trusts the manager to use discretion for the emergency order and will only do so if there is confidence in the run during times of king salmon conservation and can ensure escapement goals will be met with this limited harvest.
- The Fish Commission is hesitant to allow retention during the commercial fishing periods at this time. We are still not out of the woods yet with the king salmon run on the Yukon River and the Fish Commission wants to approach relaxing conservation measures cautiously. Allowing retention in the subsistence selective gear fishery is a good first step.
- The ADFG manager reported during the Fish Commission deliberations that allowing retention of kings in the commercial dipnet fishery would be “much more complicated.”
- In 2018, subsistence fishing with 7.5” gillnets was offered early in the season for people to harvest some initial king salmon early in the season and subsistence openings throughout the summer were with gillnets, even though the commercial fishery was restricted to dip nets through much of the season. This shows that the managers have the tools to provide subsistence opportunity using gillnets openings while also remaining cautious in the commercial fishery – to ensure king salmon escapement goals will be met without losing an opportunity to capitalize on a commercial surplus of chum salmon.

Proposal 90 – Reduce the amount of time when subsistence fishing is closed before the first commercial fishing period of the season.

Fish Commission vote: Unanimously support as amended



Proposed amendment: Do not list the number of hours (the proposals suggests 6), but rather, include language that gives the manager flexibility to determinate the duration of the closure on a case-by-case basis annually.

Why the Fish Commission supports as amended:

- The original regulation was intended to limit the ability for people to sell their subsistence-caught salmon in the commercial fishery. This practice is of no over very little concern in recent years and the 24 hour closure is unnecessary.
- Providing language that gives the department flexibility to amend the hours, as necessary, would allow ADFG to increase the closure time during years when the sale of subsistence-caught salmon in to the commercial fishery is of concern.

Proposal 91 – Reduce the amount of time before, during, and after commercial fishing periods when the fishery is closed for subsistence in Districts 1-3.

Fish Commission vote: Unanimously opposed

Why the Fish Commission opposes:

- The department already has the flexibility to reduce these closure periods, as they have done in recent years. In fact, the department recently allowed subsistence fishing immediately after a commercial period closes or even allowed it concurrently with commercial fishing.
- As such, the Fish Commission sees no need for this regulatory change.

Proposal 92 – Restrict Districts 4-6 to a maximum gillnets size of 6 inches or less.

Fish Commission vote: Unanimously opposed

Why the Fish Commission opposes:

- There are mixed views and experiences with regards to fishing with 6-inch gear as a means for conserving king salmon, especially large and female king salmon. Some report that dropout rates are high and that kings dropping out are unlikely to survive upriver migration. Others have voluntarily used 6-inch gear because they catch fewer large females and more young (predominantly age-5) males. Without clear data on drop outs and the limited data on the ability for 6-inch gear to conserve large, female king salmon, it is hard to support a mandatory restriction at this time. The Fish Commission continues to support and encourage individuals to use 6-inch gear when and if it works for them and their family's needs.
- Restricting these districts to 6-inch gear could result in a lost opportunity for king salmon subsistence fishing and a potential unnecessary waste of summer chum salmon –



especially in areas of high summer chum salmon numbers (e.g. District 4). The 6-inch gear is intended to target summer chum salmon. When summer chum are running strong, the nets can plug up with the chum, catching only a few king salmon. When a family has already met their needs for chum salmon, they would like to fish with king gear – which is 7.5 inch – to target the king salmon they need for subsistence. If they are restricted to 6-inch only, their net will become plugged with unwanted and unneeded chum salmon for only a few additional king salmon that are needed – meaning fishermen will not meet their king salmon needs and will have to waste a lot of chum salmon while attempting to get their subsistence king salmon needs.

Proposal 93 – Repeal the requirement to remove tips of tail of subsistence-taken salmon in Districts 1-3.

Fish Commission vote: Unanimously support as amended

Proposed amendment: Require the removal of the tail tips during times of king salmon sales only. If king salmon are not being sold in to the commercial fishery, then clipping the tails is not necessary.

Why the Fish Commission supports as amended:

- King salmon commercial sales on the Yukon River have not occurred on any reasonable scale in nearly a decade. Requiring the removal of the tips when no sales of king salmon is occurring is time-consuming for fishermen.
- Most fishermen report that they are not currently removing the tips of tails from subsistence-caught salmon in this area and that there is no enforcement of this regulation as it is.

Proposal 94 – Allow the taking of the first king salmon entering the Yukon River for religious and ceremonial use.

Fish Commission vote: Unanimously support as amended

Proposed amendment: The Fish Commission would like to see this proposed regulation extended to the entire Yukon River drainage and recommends modeling the regulatory language after the game regulation that allows ceremonial-take of moose. The Fish Commission supports the intent of a regulation that is meant to allow for harvest of salmon, during closures, for religious purposes (i.e. funerals and memorials) and supports a regulation that would clearly define the process for a community or Tribe to request a religious or ceremonial take of salmon.

Why the Fish Commission supports as amended:

- Traditionally, Alaska Native Tribes and communities hold potlaches to memorialize the passing of another person and to support the family of the deceased. An ADFG report to the Board of Game in 2010 – in regards to the ceremonial harvest of moose by Alaska



Native people in the Ahtna region – summarized that “funeral and memorial potlaches are events of unparalleled significance in the spiritual and social life of Athabascan people” and that “wild foods are vital elements of these ceremonies, which follow a rich tradition of preparing and sharing these foods”.

- Regulation 5 AAC 92.019 (<http://www.legis.state.ak.us/basis/aac.asp#5.92.019>) allows the take of big game for certain religious ceremonies. Salmon are also an important part of ceremonial and religious potlaches on the Yukon River.
- When fishing closures are in place, it is difficult for fishermen and families to participate in this time important tradition that is both religious and ceremonial.
- While subsistence salmon fishing has been liberalized in recent years as the Yukon River king salmon runs slowly improve, restrictions and closures are still necessary at the beginning of the king salmon run until confidence is gained in the inseason projections. Additionally, given king salmon runs around the state and the precarious state of the Yukon River king salmon run, it is not out of realm of possibility that we may enter times of considerable conservation again in the near future.
- Currently, there is no regulation regarding the take of king salmon for religious or ceremonial uses during fishing closures. Communities and Tribes request harvest of salmon during fishing closures for funerals and memorials by contacting the ADFG manager directly. The manager handles these requests on a case-by-case basis, typically limiting the number of salmon harvested, limiting gear size and fishing time, and requiring immediate reporting of harvests. There is currently no defined process for requesting these religious harvests and there is no transparency of the process.
- Even though ADFG uses their discretion now, the Fish Commission supports putting explicit in regulation so that there is both transparency and assurance in how the requests are handled.
- The Fish Commission has drafted regulatory language modeled after the regulation allowing ceremonial-take of moose. This draft regulatory language will be provided at the BOF meeting.

Proposal 95 – Around the Yukon River bridge area, require the minimum distance of 300 feet between units of set gillnet gear and limit the amount of net gear that may be set in one eddy to 350 feet.

Fish Commission vote: Unanimously support as amended

Proposed amendment: There is concern the 300 feet proposed between gear may be a burden for some families. Fishermen familiar with this area report that not every eddy is 300 feet apart and this proposed distance may actually have a negative impact on families fishing eddies near one another. The Fish Commission proposes keeping the distant between gear at the current regulation of 200 feet. The intent is that 200 feet between gear should already reduce crowding and that the lack of enforcement is the issue, rather than the regulatory distance between gear.



Additionally, the Fish Commission proposes limiting the total length of set gillnets in this area only (not the entire river – just this area) to no more than 150 total feet of set net in a single eddy.

Why the Fish Commission supports as amended:

- It is well known that crowding has become an issue in this area of the river. Many setnet sites where families have fished for generations are being taken over by new fishermen or non-locals.
- Some fishermen report that they are getting choked off at their traditional sites by new fishermen who are getting too close. However, the fishermen report that this is due to a lack of enforcement of the 200 foot regulation, rather than the distance required between gear sets, and believe that, if adequately enforced, 200 feet should be enough to keep people from choking each other.
- Fishermen familiar with this area report that no one fishes with set gillnets longer than 150 feet and that anything more than that in a single eddy is far too much gear.

Proposal 96 – Allow subsistence fishing for fall chum salmon in District 5 without time restrictions (e.g. open 7 days a week) if commercial fishing for fall chum salmon is open in other Yukon River districts.

Fish Commission vote: Unanimously support as amended

Proposed amendment: The Fish Commission supports allowing fishing 7 days a week in District 5 only if: 1) the majority of the king salmon have already gone through the area that would be open 7 days a week and 2) the manager has the discretion to pull back on the 7 days a week if it looks like inseason run size is projecting to below meeting escapement goals (e.g. the run actually ends up worse based on Eagle sonar projections than we previously thought based on Pilot Station sonar projections).

Why the Fish Commission supports as amended:

- The intent of this proposal is not to increase harvest in this area; rather, the intent is to increase efficiency for fishermen in the area to meet their subsistence needs.
- If commercial fishing is being allowed early in the run and in the lower part of the Yukon River drainage, then the department must have confidence that escapement goals will be met and that the run can support a full subsistence harvest – as these are the priorities before executing a commercial fishery.
- District 5 is often the most heavily restricted area of the river, due to:
 - Not as many stocks and species move through this area, so there are fewer opportunities for fishermen to harvest other abundant species or selectively target other stocks/species.
 - Inseason projections and fishery openings are based on the Pilot Station sonar and preseason forecasts. As the season progresses and other projects begin counting fish, confidence is gained in the run projection based off the Pilot Station sonar.

However, this can and has, in the past, resulted in a lowering of the inseason projections (e.g. Pilot Station “overcounted”) and District 5 is the last opportunity for ADFG to take conservative management actions to ensure escapement goals will be met.

- The department reports that they are already basically doing this in recent years. Much like when the 1st pulse protection passed in the 2013 BOF cycle, ADFG was already doing 1st pulse protections without it being mandated in regulation. However, the BOF decided to place it in regulation for assurance and consistency across managers.
- With the recommended amendment, ADFG would have the ability to reduce fishing time or close the fishery if, in fact, the fall chum run turned out to be lower than expected and would not meet escapement goals (actually, the manager already has the authority to close or restrict a fishery at any time or in any place in order to ensure escapement goals will be met).
- There is concern that if District 5 is open 7 days a week by the time fall chum salmon arrive and the inseason projects show escapement goals will not be met, that the department will then have to “restrict” District 5 down to five days a week or less. This restriction would then trigger a reduction in the commercial fishing opportunity. However, by the time the first pulse of fall chum salmon arrives in District 5 (ideally when the area would begin fishing 7 days a week), the lower river commercial fishery is nearly complete. As an example, in 2018, the first pulse of fall chum salmon arrived to District 5 on August 21. By that point, there had already been 12 commercial openings in District 1 and 12 openings in District 2 with over 1.5 million pounds of fall chum salmon harvested commercially. The last pulse of fall chum salmon entered the river on August 18 in the lower river. Commercial fishing periods continued in to September, but by that point, the majority of the fall chum salmon commercial fishery had already occurred.

Proposal 97 – It is the Fish Commission’s understanding that this proposal will be pulled by the proponent. No action taken.

Proposal 98 – Decrease the depth of gillnets in Districts 4-6 in the Yukon Area.

Fish Commission vote: Unanimously oppose

Why the Fish Commission opposes:

- Currently, there are no differences in the depth of subsistence gillnets along the Yukon River – all subsistence gillnets have no depth restrictions, unless specified by emergency order during times of king salmon conservation. The Fish Commission does not support setting depth restrictions for subsistence gillnets for one area of the river only, if no conservation or biological concern is stated.
- There are differences in the allowable depth of nets for commercial fishing. Commercial gillnets in Districts 1-3 are shallower than commercial gillnets in District 4-6. As such,



this proposal would only impact commercial gillnets. It is our understanding that the shallower nets in Districts 1-3 were originally proposed and supported by fishermen in the lower river to limit competition from non-locals using deeper nets – not because there was a biological or conservation concern.

- There are very few people who fish commercially with gillnets in Districts 4-6 (most are fish wheel fishermen) and with no consistent commercial buyer for the region and no biological or conservation concern caused by the depth of these few nets, this regulation does not make sense at this time. It would cause an undue burden on the very few fishermen who use gillnets to fish commercially in the area.

Proposal 99 – Allow the use of beach seine gear to harvest salmon during open commercial fishing periods in Districts 1-3.

Fish Commission vote: Unanimously oppose

Why the Fish Commission opposes:

- The Fish Commissioners from this area are concerned about the potential for overfishing with this additional gear type, as fishermen familiar with the gear in the Anvik River report beach seines being a very effective gear type.
- Additionally, there is a concern that with new gear, there will be more boats in the water, which would increase competition among gear types.
- Fishermen from this area have not widely reported a desire to use this gear type during regular commercial fishing openings when gillnets are allowed and no conservation measures are necessary. However, if more fishermen in the area would like to use this gear, the Fish Commission would consider supporting this proposal in the future. In the meantime, it seems too complicated to execute for very little benefit overall to the people in the fishery.

Proposal 101 – Open and close the commercial fishery for fall chum and coho salmon in the Yukon Area by emergency order.

Fish Commission vote: Unanimously support

Why the Fish Commission supports:

- Given climate change and later run timing for many stocks/species, this would provide the department flexibility to execute a commercial fishery that would capitalize on an available surplus of salmon.

Proposal 102 – Include the Pastolik and Pastoliak Rivers in District 1.

Proposal 103/104 – Repeal the closed waters within 500 yards of the mouths of these rivers and also repeal the closed waters in the lower three miles of these rivers.

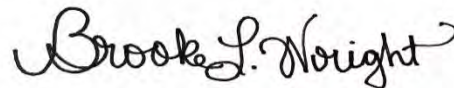
Fish Commission vote (took up the three proposals together): Unanimously support all three proposals

Why the Fish Commission supports:

- After hearing from local residents and traditional fishermen from the area, they informed the Fish Commission about the local and traditional knowledge of these rivers. Local and traditional knowledge of these rivers is that the salmon are not spawning in the areas proposed for opening to fishing and that while some salmon may spawn much further upriver, there are many salmon that are simply milling in these rivers before moving on to their natal streams elsewhere.
- This is a proposal that uses local knowledge and supports local people.
- These are historical and traditional fishing sites, passed down within families for generations. Opening these rivers as proposed would decriminalize a traditional practice.
- The local people were not consulted when these rivers were originally closed down and also were not consulted when the department and Board extended the fishing area up to Point Romanof without including these rivers in that extension.
- Opening these rivers would make it easier for local people and families to harvest their subsistence needs of salmon.
- The Fish Commission trusts the department to execute a commercial fishery in these areas cautiously, given the potential for salmon spawning in the rivers. As a Fish Commission, we support studies for these rivers so that we have a better understanding of the salmon and the traditional and local knowledge of the area. However, we do not believe that the fishing pressure in this area presents a conservation or biological concern and would preclude opening the rivers up at this time.

CERTIFICATION

I hereby certify that all Commissioners present unanimously supported these proposals, December 4-6, 2018 in Galena, Alaska.



Brooke Wright
Yukon River Inter-Tribal Fish Commission Chair

Quorum established with the following Fish Commissioners present and voting unanimously:

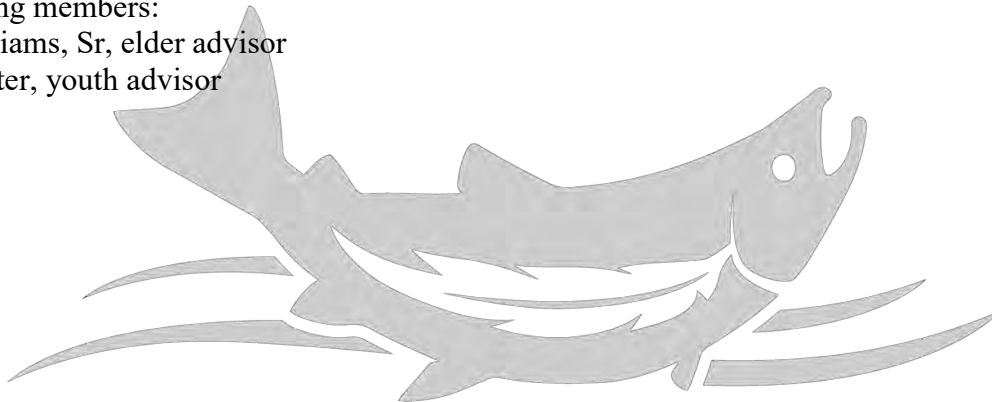
Brooke Wright, Rampart, Chair
Don Honea, Ruby



Jenny Pelkola/Mark Huntington, Louden
Julie Roberts-Hyslop, Tanana
Kody Vanderpool, Beaver
Darrell Vent, Huslia
Harding Sam, Alatna
Gerald Alexander, Fort Yukon
Phillip Jeep Titus, Minto
Ray Woods, Manley
Tim McManus, Nenana
Arnold Demoski, Nulato
Percy Lolnitz, Koyukuk
Carl Jerue, Anvik
Ben Juneby, Eagle
Basil Larson, Russian Mission (by teleconference)
Ray Oney, Alakanuk (by teleconference)

Non-voting members:

Paul Williams, Sr, elder advisor
Darcy Peter, youth advisor





Alaska Board of Fisheries
Reed Morisky, Chair
Attn: Glen Haight, Executive Director
1255 W 8th Street
P.O. Box 115526
Juneau, AK 99811-5526

January 2, 2019

Dear Chairman Morisky and members of the Board of Fisheries,

On behalf of all of Alaska's aquaculture associations, we would like to thank you for the opportunity to comment on the Agenda for the Hatchery Committee to be held March 8, 2019. We believe this is an important step in educating the public and Board of Fisheries on Alaska's hatchery program and the foundational science supporting the program as we know it today. There is a wealth of information that could inform the Board on hatchery topics--more than can be covered in a single day. As a result, we recognize that with just one day allocated to the Hatchery Committee meeting, the agenda must be both focused and specific. We respectfully submit the following topic outline and subsequent descriptions for your consideration:

1. Regional Planning Teams

- a. Structure, Statutes, Function, and Authority (commissioner)
- b. Ex-Officio members and roles
- c. Activities/Examples
- d. Comprehensive Salmon Plans
 - i. Process; Public involvement; Regional differences and objectives; History and role of enhancement in each region
- e. Identification of significant stocks and wild stock sanctuaries

2. Comprehensive Salmon Plans, Programs by Region

- a. Existing production—North Pacific Basin, statewide, and by region
- b. Goals of CSP by Region
- c. Regulatory guidance that has shaped CSP planning process, programs, and proposals

3. Science

- a. AHRP/HWI Research
 - i. Details of work and findings to-date
 - ii. Details of Continuing work, what it will achieve, implications
- b. Identify where we have legitimate information gaps
- c. Changes in ocean environment
- d. Life history and competitive interactions

We believe it is important for the board to follow the Joint Protocol on Salmon Enhancement (#2002-FB-215). This will allow for regular updates to the Board of Fisheries and the public, as well as provide for regional participation by affected areas during the appropriate meeting cycle. The Hatchery Committee meeting is a logical step to gaining greater depth of knowledge on hatchery regulations, permitting, and science related to the topic. To achieve this, we suggest breaking the day into two or three presentations beginning with an in-depth presentation on the statutes and guidance related to the Regional Planning Teams and their practical application. The Board should review specific examples of how permit requests and Permit Alteration Requests are generated, vetted, and the responsibilities of the RPTs and other parties in relation to the process.



As a second topic, we suggest a review of the regional Comprehensive Salmon Plans. The activities of Alaska's aquaculture associations in each region reflect the goals of the Comprehensive Salmon Planning process as conducted by the respective RPTs through a public process. This portion of the agenda should also include an introduction to the production levels, both natural and enhanced, and programs from regional and statewide perspectives as well as through the lens of salmon production in the North Pacific as a whole.

The Comprehensive Salmon Plan (CSP) for each region details potential for future production and projects as requested by users in the region for those salmon fisheries. The programs and projects of each region are unique and complex. While similar in regulations, methodologies, and best practices are applied across the state, consideration of local knowledge, specific fisheries, and market needs go into the development of projects in a region, past, present, and future. It is therefore difficult to apply generalities to all Alaskan hatchery production without some understanding of the various regions and the specific mechanism by which the enhancement programs have been developed.

Finally, we suggest the Board focus specifically on the research and preliminary findings of Alaska Hatchery Research Project (AHRP) and Hatchery-Wild Interaction Study (HWI) and associated information. The information and analysis that is expected to come from the AHRP and HWI represents the best of current science on hatcheries and specifically hatcheries in Alaska.

We look forward to working with the Alaska Department of Fish and Game in conjunction with the Alaska Board of Fisheries to help educate the public on the Alaska Hatchery Program and work toward a deeper understanding of Alaska's salmon to help ensure the future. While there are many unanswered questions related to complex topics such as Ocean Carrying Capacity or food web competition, it is important to begin the new hatchery committee by developing a deeper understanding of where we are today and why. At this time, we feel it would be premature to attempt to address these questions without a scientific approach. We encourage this ongoing discussion as it allows for the Board and the public to gain broader knowledge of the programs while bringing to light fact-based, scientific work ongoing within the industry. As scientists and stewards of the resource, we see this inquiry and the knowledge gaps it is helping us identify as a benefit, and we look forward to continuing to bring the knowledge and benefits of these important salmon enhancement programs to the public's attention.

Respectfully,



Tina Fairbanks

On Behalf of:

Alaska Hatchery Operators

Armstrong-Keta Incorporated
Bart Watson, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Douglas Island Pink and Chum
Eric Prestegard, Executive Director



Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Northern Southeast Regional Aquaculture Association
Steve Reifensstuhl, General Manager

Prince William Sound Aquaculture Corporation
Casey Campbell, General Manager/CEO

Southern Southeast Regional Aquaculture Association
David Landis, General Manager

Valdez Fisheries Development Association
Mike Wells, Executive Director



ARMSTRONG-KETA, Inc.



Prince William Sound
Aquaculture Corporation
DEVELOPING SUSTAINABLE SALMON FISHERIES
FOR ALASKA AND THE WORLD



Southern SE Regional Aquaculture Association
14 Birch Street, Ketchikan, AK 99901. Phone: 907-225-9605. FAX 907-225-1348





January 2nd, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
dfg.bof.comments@alaska.gov
ATTN: BOF COMMENTS

RE: COMMENTS ON AGENDA FOR MARCH 8TH SALMON HATCHERY COMMITTEE MEETING

Chairman Jensen and members of the Alaska Board of Fisheries,

Icicle Seafoods is one of the largest and most diversified seafood companies in North America. Our operations are located throughout the State of Alaska including Southeast, Prince William Sound, Cook Inlet, Kodiak, Dutch Harbor, and Bristol Bay. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of fisheries resources. We appreciate the opportunity to comment on the agenda for the upcoming March 8th, 2019 salmon hatchery committee meeting.

Over the past year, salmon hatchery production has been a frequent item on the Board of Fisheries agenda. Given the confusion over the hatchery permitting process and the significant amount of opinion being presented as science by members of the public, it would be beneficial to revisit the existing salmon enhancement public process and include expanded information regarding salmon hatchery production throughout the entire North Pacific in addition to other agenda items.

At this time, it's isn't entirely clear what the hatchery committee's purpose or scope will be, and it is unclear if the expected outcome is different from the intended purpose of the Board of Fisheries and Alaska Department of Fish and Game joint protocol on salmon enhancement. The joint protocol was developed and can be utilized in order to create a public forum/process for the BOF to review hatchery related issues at regularly scheduled meetings that members of the public can plan for. A predictable public process is important to all salmon users. We support efforts to return to a yearly review process as opposed to a separate committee process.

We offer the following items for consideration on the salmon hatchery committee agenda:

- Review of current Board of Fisheries and Alaska Department of Fish and Game joint protocol on salmon enhancement.
- Overview of the current Regional Planning Team (RPT) process and statutory authority.
- Overview of the various Salmon Management Plans.
- Status update and review of the Alaska Hatchery Research Program.
- Comprehensive update on historical salmon hatchery production throughout the entire North Pacific and Alaska's role in overall production.
- Economic data regarding salmon hatchery production in Alaska and coastal communities.
- Overview of enhanced salmon harvest by commercial, personal use, sport, and subsistence users.

Each of these potential agenda items will help provide valuable context in order to determine how the committee or the BOF should proceed regarding salmon hatchery issues. Regardless of the outcome of the meeting, we urge the BOF to consider returning to a consistent yearly process for dealing with hatchery-related issues.



Icicle Seafoods extends an open invitation to any member of the board to observe salmon or other fisheries and processing operations. Thank you for the opportunity to comment, please reach out if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Julianne Curry".

Julianne Curry
Public Affairs Manager
Icicle Seafoods
Julianne.Curry@icicleseafoods.com
Cell 907.518.1822



Kodiak Salmon Work Group
c/o Kodiak Regional Aquaculture Association
104 Center Ave., Suite 205
Kodiak, Alaska 99615

December 31, 2018

Chairman Reed Morisky
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Suggestions for March 8th Hatchery Committee Agenda

Dear Chairman Morisky and Board Members,

The Kodiak Salmon Workgroup is a coalition of Kodiak salmon stakeholders interested in the management and support of Kodiak Island's salmon fisheries. Enhanced stocks from Kodiak Regional Aquaculture Association's two hatcheries contribute to Kodiak's commercial salmon fishery as well as our sport and subsistence fisheries. Consequently, when the Alaska Board of Fisheries' Hatchery Committee meets or when the Board reviews hatchery issues, Kodiak's Salmon Workgroup is engaged. We would offer the following suggestions for the March 8th agenda of the Hatchery Committee.

The Committee's time is limited for the broad topic at hand, and the Board should consider a limited number of topics in depth rather than have an overview of a host of topics. No more than three, or perhaps four, topics should be placed on the agenda.

First, we have seen much misunderstanding and disagreement regarding the hatchery permitting process and the work of the regional plan teams. We recommend that the Board prioritize a comprehensive review of the permitting, scientific oversight and hatchery management undertaken by the Department and the respective regional plan teams. For example, we would like to see a detailed review of the Regional Planning Team (RPT) history, process and protocols under AS 16.10.375, as well as the comprehensive salmon plans required by the same statute.

The RPT process is very complicated and can seem confusing so we feel that a thorough explanation would benefit the Board of Fisheries members as well as the public. We would like the review to include details on how many permits have been approved by the RPT's without any changes, how many permits were approved with amendments to the original application, how many permits were denied, and how many were withdrawn by the hatchery operator based on feedback from the RPT. Let's inform the larger discussion regarding Alaska's hatcheries with a common understanding on the current processes and oversight.



In addition, we recommend a detailed review of total hatchery production throughout the Pacific Rim over the past 30 years or so. The Alaska contribution should be illustrated and the ebb and flow of other hatchery producers clarified. We would suggest that this discussion, to the extent practicable, provide the regulations and/or limitations on hatchery production in other States and Countries. Finally, known migratory patterns from all North Pacific hatchery releases should be reviewed. In other words, it is critical to see Alaska's hatchery program in context with the host of other North Pacific hatchery programs.

Our third suggestion for your March 8th hatchery committee agenda would be an economic analysis of the importance of hatcheries to Alaska by region, including sport, commercial, personal use and subsistence fishermen as well as the processing and tourism industries. This analysis will illustrate the total value of hatcheries to the Alaska economy. Again, it is important to establish a common understanding of Alaska's hatchery economics before substantive changes should be considered.

The Kodiak salmon workgroup is aware of a number of additional topics that could be considered for the March agenda, however we believe the priorities for the meeting should be: 1) Regulatory oversight of hatcheries; 2) Alaska and North Pacific hatchery production and migratory trends; 3) Economic value of hatcheries by region. If you have any questions regarding the Kodiak Salmon Workgroup's recommendations for your Hatchery Committee's March 8th agenda, please do not hesitate to contact me.

Very truly yours,

Duncan Fields, Chairman



Submitted By
Leroy Cabana
Submitted On
12/18/2018 4:46:22 PM
Affiliation

Concerning the agenda suggestion request I would like the Board of Fisheries to set future hatchery meetings in the standard 3 year meeting cycles that all other fisheries are subject to.

For example if someone wants to submit a proposal to change the egg take limits for hatchery produced pink salmon in PWS, that proposal should be submitted during the call for proposals in the PWS meeting cycle. If somebody wants to change hatchery chum salmon egg take limits in SE this should be dealt with by submitting a proposal during the call for proposals in the SE salmon meeting cycle.

Currently there is no clear place to submit a hatchery proposal so we the public and the BOF are being notified there is hatchery meetings several times a year. This is causing a heavy burden to all parties involved. The ADF&G is producing endless reports, fishermen whom are used to being involved in possible regulatory changes in the areas they fish in are unable to attend the several meetings that we experienced in 2018. Two of these "emergency" PWS hatchery pink salmon meetings took place during the salmon season in PWS in May and July. There is a reason the BOF does not schedule salmon meetings during the fishing season, it's based on allowing affected parties in the geographic area affected to be reasonably able to attend or otherwise participate in the meetings. It is unreasonable to have to attend several meetings each year on the same subject.

There are currently salmon hatcheries in SE, PWS, Cook Inlet and Kodiak. There is no reason folks that want to submit proposals to change or amend hatchery production or operational procedures can not follow the rest of fisheries proposals that meet every 3 years. I know, some folks feel the hatchery issues they feel strongly about need to be met on a several times a year on an emergency basis. Heck, every body thinks their proposal is an emergency, but all the other proposals in the various areas in Alaska are properly dealt on a 3 year basis.

January 2, 2019

Alaska Board of Fisheries
Reed Morisky, Chair
Via email: dfg.bof.comments@alaska.gov

RE: Comment on March 8 Hatchery Committee agenda

Chairman Morisky and Board Members:

Thank you for the opportunity to comment on the agenda for the Alaska Board of Fisheries (board) Hatchery Committee scheduled for March 8.

PSPA is a nonprofit seafood trade association representing seafood processing businesses and their investment in coastal Alaska, including several shorebased processors located in Prince William Sound, southeast Alaska, and Kodiak. Alaska's unique salmon enhancement program is critical to the stability of the fishery-dependent communities in these regions, as well as the livelihoods of thousands of Alaskans. Alaska's salmon hatcheries contribute nearly a quarter of the value of our state's salmon harvests and generate \$600 million in economic output, with impacts throughout the economy. Given the interest in and dependence on the hatchery program and the overwhelming public support for the program conveyed at your October 2018 work session, we appreciate the board soliciting comment to facilitate its further review.

The board's interest in the hatchery program has provided an opportunity to inform the board and the public through reports from the Alaska Department of Fish and Game (ADFG) on hatchery related issues including production trends, the permitting process and management, updates on hatchery planning efforts, wild and hatchery stock interaction research, and international production and research related to ocean carrying capacity. To comprehensively review Alaska's hatchery program and cover permitting and management issues not addressed fully last October, we suggest an agenda that includes the following components:

Review of ADFG salmon enhancement program (ADFG staff)

- *Overview of the development of the hatchery program and policies designed to provide protection for wild stocks*
- *Review of Regional Planning Team process and protocol under AS 16.10.375, including review of comprehensive salmon plans and permit alteration requests*
- *Review of board and ADFG joint protocol on salmon enhancement*
- *Review of Alaska Hatchery Research Program, including recent genetic results*

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- *Review and context of Alaska and international production over the last 20 years; review of forums to support international cooperative research/data sharing*
- *Economic value of hatcheries by region*

A specific focus on how the regional planning teams operate and what they are responsible for seems like valuable information for the committee process, as well as the purpose and objectives of the comprehensive salmon plans, which are required by law and document enhancement efforts, set production goals, and identify potential for new projects.

The board's expectations for the role of the committee are unclear at this time. The existing joint protocol between the board and ADFG on salmon enhancement was intended to provide a public forum for the board to receive reports from the department on hatchery related issues during regularly scheduled meetings of the board. We appreciate that the board provided a review and discussion of ADFG's hatchery program at the October work session and hope that future reviews can be established on a reasonable schedule for public participation. Given the interest by the full board, we are unsure of the need for an additional layer of meetings through the committee. We support an annual ADFG report to the full board on hatchery-related issues such as those outlined above, to educate and objectively review this program as it develops over time to enhance and sustain Alaska's salmon economy. More involved reviews of area-specific issues could be accommodated for each area's regularly scheduled board cycle, if necessary.

Thank you for your consideration and your public service.

Sincerely,

Nicole Kimball
PSPA - Anchorage

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1/1/19

RE: Proposed March 2018 Hatchery Committee Agenda items

“Institutionalize a public forum to bring a statewide perspective to issues associated with hatchery production of salmon and coordinate department and board interaction on certain aspects of salmon hatchery policy and regulation”¹

1. Adopt Hatchery Regulations into public Call for Proposals cycle

- Chapter 40. – PNP Hatchery Regulations
Example: 5 AAC 40.005 General;
40.130 Management Feasibility Analysis;
40.310. Regional planning team composition
40.860. Performance review
40.990 PNP Definitions
- Chapter 41 – Transportation, Possession, and release of live fish;
Example: 5 AAC 41.020. Inspection for disease of broodstock
41.050. Permit conditions - control disease, genetics
41.080. Reporting and control of fish diseases
- Chapter 93 – Department programs – (Use or Waste of Hatchery Salmon)
Example: 5 AAC 93.310. Waste of Salmon

2. Determine the extent of hatchery straying, homogenizing wild escapement systems (SEG) in the State of Alaska

Accumulate and evaluate all past and ongoing Hatchery/ Remote release straying studies

- thermal otolith marks; coded wire tagging; fin clips; other
- assemble into centralized open access report
- map and post on ADFG website
- incorporate into Annual Enhancement Reports

Accumulate and evaluate past and ongoing Hatchery Marking Programs

- Identify hatcheries or releases without adequate identifying otolith or marks
 - Hatchery sites
 - Remote Release Sites
 - Treaty involved salmon
- Identify Hatcheries or release sites with chronic hard to read otoliths or failures confounding accurate marking programs
- dates marking was initiated
- assemble into centralized open access report
- Identify date full marking compliance is anticipated
- incorporate information into Annual Enhancement Reports

¹ ADFG BOF #2002-FB-215 Joint Protocol on Salmon Enhancement

Accumulate and evaluate past and present Escapement Data

- before hatcheries
- after hatchery implementation
- Review efforts to estimate proportions of hatchery and wild harvests

Extract from escapement SEG data

- % of all SEG's never monitored for hatchery strays
- % of those monitored found contaminated with hatchery strays
- Where is monitoring of otolith marking now taking place in the State of Alaska?
- What areas of Alaska are not monitored for straying into wild systems?
- Were the 2017 pink salmon inundated areas monitored for hatchery strays? Chignik? Yakutat? Unalaska?
- Assemble needed studies into centralized open access report
- Incorporate information into Annual Enhancement Reports

“Initiation of necessary corrective measures without delay...”

39.222 (c)(5)(A)(iii); (iv)

“Wild Sanctuary Stock”² designation for all statewide uncontaminated anadromous waters

- Carefully Monitor and safeguard these sanctuary stocks
- Create regulatory corrective measures when hatchery contamination occurs

Initiate annual statewide thermal otolith monitoring for accurate SEG management

39.222 (3)

- Otolith sampling monitoring must become standard annual g protocol to identify and correct promptly how far and how much hatchery strays are expanding into wild systems.
- initiate remote release site mark monitoring sampling from all SEG's
- Broaden annual otolith sampling in remote regions (main and tributaries) Chignik; Unalaska; Yakutat; Yukon; Kuskokwim; Kenai; Bristol Bay Nome; Utqiagvik, Glacier Bay, etc

3. Food Web interactions with introduced salmon into wild systems all habitats

- Request a comprehensive Systematic Review of all food web interactions and carrying capacity studies 39.222 (c)(4)(E); (c)(5)
 - Collaboration for Environmental Evidence Review
- Compile all literature for risk assessment
- Wild fish prey Competition all life stages
- Potential Pounds of food consumed per day out-migrating hatchery biomass per 100,000,000
- Potential pounds of food consumed per day returning adults per 5,000,000

² ADFG Genetics Policy



4. Evaluate Special Harvest Areas (SHA)

Accumulate all Special Harvest Areas (SHA's) and Remote Release Sites (RRS)

- all regulatory; permit embedded; or emergency order SHA's and RRS in Alaska
- Post with map and coordinates on ADFG website
- assemble into centralized open access register
- incorporate information into Annual Enhancement Reports

Reevaluate SHA's and Remote Release Sites in proximity to wild shellfish and wild salmon rearing areas 39.222(5) (A)

- Wild run timing, fry release and hatchery adult return info
- Crustacean first demersal benthic settling, peak spawning periods larvae in plankton
- straying propensity information per each release site,
- shallow shelves jeopardizing other species from gear
- seine gear hard on bottom scraping
- closed waters opened for hatchery strays jeopardize other fish species or fisheries
- with consideration to indigenous wild portfolio salmon stocks

5. Utilize digital ADFG Anadromous Waters Atlas Quadrangle Index mapping AS 16.05.871 to depict hatchery activity near wild systems.

- Create GIS layers (5 AAC 95.011),
 - of all hatchery SHA's; THA release sites; Remote Release Sites;
 - Clarify Bathymetry showing wild fish species nearshore rearing shelves.
 - NOAA Shore Zone mapping linking food web attributes.
 - accumulated past present statewide straying events.
 - <http://awc.adfs.alaska.gov>
- AS 16.05.020;

6. Regional Planning Teams (RPT) 39.222 (c)(4)

Adopt related RPT Regulations

Example: 5 AAC 40.300. Regional planning teams in general
40.310. Regional planning team composition
40.340. Regional planning team responsibility

Voting RPT members must not be associated in permit/PAR/AMP signing or approvals

- List performance of RPT's past and present, to report, address, and correct straying
- Performance to uphold state mandates and policies

Involve BOF public process in PAR negotiations before decisions are made

- Does the public even know RPT's exist? Why not?
- Coordinate RPT's with BOF open process for statewide perspective and notification to public
- require annotated audio webcast (like BOF soniclear) to record all RPT meetings
- Verify transparency of the RPT process,
 - How is proposed permitting communicated to the public
 - how open is the public process
 - how are meetings noticed
 - Are PAR "extensively vetted" prior to approval or denial as stated.
 - What constituency of the public is involved in decision making?



Significant Stocks³

- Are “significant stocks”⁴ based on genetic policy frameworks or arbitrary design
- Since “significance” must be defined not only by magnitude but local importance and utilization”, criteria used to determine “significant stocks” requires public review considered in BOF Call for Proposals

Portfolio Stocks⁵

- “portfolio stocks” are now recognized for the power of the combined collectives of salmon biomass into the fisheries
- portfolio stocks are an asset acknowledged that ensure sufficient genetic diversity
- Statutes do not discriminate “portfolio stocks” as non-significant to be sacrificed to hatchery contamination due to size
- **AS 16.05.730.** ...shall be consistent with sustained yield of wild fish stocks.

Re-evaluate all Comprehensive Salmon Plans (CSP)

- Are CSP’s comprehensive and balanced for “wild naturally spawning self-perpetuating fish production obligations?
- Verify CSP’s consistency in permitting, planning, operations and management
- **Verify accuracy of information in Annual Enhancement Report**
- Are hatchery operators following regional CSPs as directed?

7. Hatchery Section of Comm Fish

- Are employees backgrounds objective to defend ADFG wild fish priority
- Can this section provide impartial decisions and reporting
- Are balanced decisions prioritizing wild fish incorporated into RPT decisions?

8. Investigate Hatchery Activated Predator Fields (HAPF)

- Magnitude Hatchery biomass draws in predation into release sites exacerbating predation on wild species (a predator pit)
- These releases activate predator fields that accumulate in rearing shelf areas of wild species fisheries or their food
- HAPF Predators drawn in by hatchery releases creates continual persistent need of Remote Release PAR’s
 - Remote Releases Precipitate increased straying

9. Standardize definitions for “magnitude” and objective of “hatcheries”,

- adopt Definitions 5AAC 40.990
- generic term “hatchery” is confusing to public
- differentiate terms based on magnitude of permitted capacity to signify level of impact due to size, species and objective
- define corporate sea ranch/remote release and corporate escapement; from local community stocking programs
 - example: 100,000,000 is **1000 X** impact of a 100,000 release

³ ADFG Genetics Policy

⁴ ADFG Genetics Policy

⁵ Bio-folio: applying portfolio theory to biodiversity



example: 10,000 = Magnitude 1; (community stocking)

1,000,000 = Magnitude 3;

100,000,000 = Magnitude 5 (corporate sea ranch)

- DEC uses “Concentrated Aquatic Animal Production (CAAP) discharge by pound, feed, feces, carcasses, medications, fungicides, pesticides.
 - Higher CAAP, higher magnitude discharge, higher level of risk to water quality

10. Roe sales /Harvestable surplus⁶

- coordinate for statewide perspective on roe sales and harvestable surplus
- Excessive broodstock collection initiated for roe sales
- inadequate reporting of roe sales
- % roe stripping per each facility by year;
- waste of the resource allowed to stray;
- Cost Recovery shortfalls;
- Cost recovery goals missed while harvestable surplus allowed to stray into wild rivers
- Hatchery marketing impacting Alaskan wild fisheries price, quality, sales

11. Acquire and evaluate List of all statewide deviations from AMPs and Permits⁷

- Substandard broodstock to egg take survival
- Substandard egg to eyed egg survival
- Substandard eyed egg to rearing survival
- Substandard reared fry to release survival
- Density dependency studies disregarded

12. Acquire and evaluate List of all statewide pathology reports

- How often are diseased salmon released into natural waters
- Does pathology lab have enough money to monitor?
- How often. For all releases?
- Example: BKD fish into Kenai, Tutka or Resurrection Bay
- Medications discharged
- Transport of eggs or fry to remote releases from diseased parents

13. Alaska General Fund Fiscal Effects of Hatcheries as benefit to all citizens

- Which hatcheries “result in substantial public benefits” that do “not jeopardize natural stocks.” AS 16.10.400
- cost analysis of how much ADFG operations devoted to hatcheries
- State of Alaska capital expenditures for facilities
- Loan analysis
- % of Commercial Fisherman solely reliant on hatcheries
- % hatchery contribution of x vessel value (not cost recovery)
- processors revenue compared to General Fund Revenue
- Processor capacity for wild fish resources
- Value adding wild fish resource

⁶ 2009 ADFG Internal Review Recommendations

⁷ 2009 ADFG Internal Review Recommendations



- Original intention of Wild Alaskan Salmon markets

14. User pay system to reduce cost to state

15. Density dependency to wild fish poundage loss to fisherman and the state

- smaller sockeye salmon documented when large pink hatchery returns and the poundage loss to the wild fish fisherman.
- ½ pound smaller equates to a loss of \$20,000,000 to state fisherman at \$1.00/ pound.

16. Cost Recovery

- State of Alaska % recovery harvest data,
- Is 2/3 hatchery adults harvested by common property annually at all hatcheries, 1/2 ?
- roe harvest data,
- broodstock collection,

17. Annual Enhancement Report Accuracy

- Upgrade to a “comprehensive annual report, containing detailed information”
- Reevaluate the “rote” used in these reports for more precision less repetition
- Aligned for consistency with actual data from ADFG Annual Management Reports.
- Clearly differentiate Cost Recovery adequately from Common Property
- All-inclusive comprehensive reporting of hatchery impact complexity.
- factual reporting to include all aspects for decision making
- a statewide perspective that relates
 - impact to wild fish quality, marketing. Processor capacity
 - saturating markets with fish or roe sales
 - influencing markets and price for wild fisheries.
 - Density dependence causing smaller wild fish
 - Poundage equals revenue loss to fisherman
 - Straying, missing marking programs,

18. Hatchery Review Committee⁸

- Knowledgeable to assist BOF for a State-wide perspective
 - Objective Independent Committee to openly deliberate issues without retribution
 - To make knowledgeable recommendations to the BOF for commissioner
 - review and monitor wild fish interaction with hatchery performance relative to their permits, AMP’s PAR’s
 - Statewide perspective prior to going to Regional Planning RPT’s
 - Access to statewide RPT draft documents months in advance of RPT decision
 - timely access to all meetings documents and records
 - to straying,
 - production and planning
 - to food webs
 - to wild fish priority
 - to applicable regulations and statutes,
 - to adverse effects on wild fish
 - to wild fish fisherman’s markets price.
 - to processing capacity
 - to quality processing of wild fish priority
 - In relation to other species

⁸ 2009 ADFG Internal Review Recommendation

Submitted By
Forest Jenkins
Submitted On
1/1/2019 10:53:42 AM
Affiliation
Prince William Sound Setnetters Association President

Submitted by Forest Jenkins, Prince William Sound Setnetter's Association President

W25126 Sullivan Road Trempealeau, WI 54661

PWS Setnet Permit Holder for 5 years

Thank you for the opportunity to suggest agenda items for the upcoming Hatchery Committee meeting. Being such a complex issue effected by so many variables, I understand the challenge you are faced with in determining the influence of hatchery strays on wild stocks. It will be essential to filter through all of the scientific data and public opinions to make a sound hypothesis based on concrete evidence.

Currently, there are so many environmental changes and human influences that are playing a role in this complex issue. Surface water temperatures in the North Pacific have been significantly higher in recent years. With climate change, wild salmon streams are experiencing changes in stream discharge, temperatures, and dissolved oxygen levels. Human influence further complicates the issue. How can we determine the direct impact of hatchery strays on wild stocks when there are so many factors influencing the fitness of wild salmon?

Salmon straying is a natural phenomenon that is essential for the survival of a stock. Wild salmon also stray to protect the stock as a whole in case there is a catastrophe in their native spawning grounds. How are the effects of hatchery strays unique from those of wild strays on other wild stocks?

Knowing that hatchery strays are a part of this complex issue, how can we determine the acceptable sustainable levels of hatchery strays in wild salmon streams, if in fact hatchery strays are impacting the fitness of wild stocks?

Being such a complex, multifactorial issue, it is essential that we isolate the effects of hatchery strays on wild stocks from all the other contributors before any changes are made to the policy impacting hatchery production.



Sitka ♦ Craig ♦ Valdez ♦ Naknek ♦ Metlakatla

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January 2, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Comments on March 8 Board of Fisheries Hatchery Committee agenda

Dear Chairman Morisky and Alaska Board of Fisheries Members:

Thank you for requesting agenda item recommendations for the board's Hatchery Committee meeting scheduled for March 8, 2019. Given the public's interest and Silver Bay's investment of time and energy in recent discussions regarding Alaska's salmon hatchery program, we greatly appreciate the opportunity to provide these comments.

Silver Bay Seafoods is a vertically integrated, primarily fishermen-owned processor of frozen salmon, herring, and other seafood products for both domestic and export markets. Silver Bay began in 2007 as a single salmon processing facility in Sitka, Alaska, remains headquartered in Sitka, and has since grown into one of the largest seafood companies in Alaska. Silver Bay has state of the art, high volume processing and freezing facilities throughout Alaska, currently operating in Sitka, Craig, Valdez, Naknek and Metlakatla. The company is also active in the California squid fishery and is currently constructing a seafood processing facility in False Pass, where we will process salmon, pollock, and cod.

Silver Bay's primary strength is the combination of its state of the art processing facilities, competent management and key personnel, and most of all, the fact that the company is primarily owned by our fishermen. Silver Bay's operations in southeast Alaska and Prince William Sound in particular benefit greatly from these areas' salmon fishery enhancement programs, as do their communities and residents. Given the overwhelming public support of Alaskan salmon hatchery production as expressed to the board over the past year, we agree that it is important for the board to solicit comments to ensure a thorough and balanced review of this unique and important program going forward.

Silver Bay remains supportive of the board's original intent to provide opportunity for the public and board members alike to receive reports from Alaska's Department of Fish and Game (ADF&G) on management, production, and research relating to Alaska's salmon fishery enhancement program. For the board's March 8 Hatchery Committee, we respectfully recommend the following agenda items:

- A review of the Alaska Board of Fisheries and Alaska Department of Fish and Game Joint Protocol on Salmon Enhancement (#2002-FB-215);
- An overview of Alaska's precautionary approach to salmon hatchery production, including a review of the implementation of plans, permits, and policies designed to provide protection for wild stocks;
 - Especially, ADF&G staff review of the state's Regional Planning Team (RPT) process, including a review of recent/relevant permit alteration requests (PARs), and the state's comprehensive salmon planning process;
- An update on the ongoing Alaska Hatchery Research Project (AHRP), and its results;
- An overview of various forums (i.e., North Pacific Anadromous Fish Commission) engaged with hatchery-related research beyond ADF&G's capacity (e.g., ocean carrying capacity), and opportunities for engagement;
- A detailed overview of the economic value of hatchery production to Alaska, and its regions and communities.



Finally, there appears to be some uncertainty among the public regarding the role of the board's Hatchery Committee, and its process going forward. Given the board's and ADF&G's failure to abide by the existing Joint Protocol on Salmon Enhancement's (#2002-FB-215) expectations for regularly scheduled meetings on management, production and research relating to Alaska's salmon fishery enhancement program, Silver Bay agrees that the October 2018 Work Session was likely inadequate to fully bring the board and public up to speed on this program and related issues. However, beyond the board's 2018–2019 meeting cycle, we encourage the board to hold one annual meeting of the Hatchery Committee or its equivalent, where such meetings will not be open for regulatory actions and no hatchery-related petitions or agenda change requests (ACRs) will be considered as action items. Further, we recommend that more involved reviews of area-specific hatchery-related issues and potential regulatory action be limited to each area's regularly scheduled meeting cycle in the future. Multiple meetings on this subject matter each year in Anchorage arguably has the potential to disenfranchise area-specific stakeholders elsewhere in the state who would otherwise be more likely to participate in this process during their regular meeting cycle. And otherwise, continually and repeatedly convening the board to address highly similar and repetitive petitions and ACRs is not the best use of the board's, the department's, or the public's valuable time, in our opinion.

We hope that the points raised in these comments provide you with additional information to aid you in your final determinations regarding the March 8 Hatchery Committee meeting's agenda. Thank you for your service to this valuable resource and the communities that depend on it.

Sincerely,

Tommy Sheridan
External Affairs
Silver Bay Seafoods
tommy.sheridan@silverbayseafoods.com



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January 2, 2019

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Comments for Hatchery Committee Agenda Topics

Dear Chairman Morisky and Board of Fisheries Members,

United Fishermen of Alaska (UFA) respectfully submits the following topics for consideration for the March 8, 2019 Hatchery Committee meeting:

- *Detailed review of the Regional Planning Team (RPT). Including an overview on the structure, statutes, function, authority, public process and the regional differences and objectives. As well a review of the Comprehensive Salmon Management Plans that are required by statute.*
- *An in-depth look at the total hatchery production of the Pacific Ocean over the last 30 years and how Alaska contributes and compares to this production.*
- *Report on the regional economics created by hatchery salmon including: direct and indirect employment, sportfish and subsistence contributions, benefits to communities via landing taxes, investment by commercial fishermen & processors, and examples of local impacts.*

We urge the board to make scientific data a priority when reviewing Alaska's hatchery system and ask that decisions are based on scientific facts. We thank you for the opportunity to provide input on a subject that is of upmost importance to our industry.

Matt Alward
President

Frances H. Leach
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Tendermen's Association • Alaska Longline Fishermen's Association • Alaska Scallop Association
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association
Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association
Northern Southeast Regional Aquaculture Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association