



RE: PROPOSAL 77 Close waters within 500 yards of the terminus of the Ayakulik River to commercial salmon fishing September 1–October 31

This proposal would limit the department's ability to manage the Ayakulik River and prevent over-escapement. I support the Kodiak Salmon Management Plan as it is currently written.



December 25, 2019

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

Re: Opposition to Proposals 73, 74, 75, and 77

Dear Chairman Morisky and Board of Fisheries Members,

I am Richard Roth, Kodiak salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife three children and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Tzar. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

I oppose the following proposals (73, 74, 75, and 77) because I support the current management plan as written. Chinook are not a target species for commercial fishermen, there is already a non-retention policy for fish exceeding 28 inches

I ask that the Board reject these proposals.

Thank you for your time and consideration,

Richard Amanda, Stephanie, Noah, and Ranger Roth
F/V Sea Tzar
Homer, AK



RE: PROPOSAL 77 Close waters within 500 yards of the terminus of the Ayakulik River to commercial salmon fishing September 1–October 31

Again lots of feelings and no facts.



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

RE: Maintain Kodiak's Salmon Fishery & Oppose Proposals: 58, 59, 60, 61, 62, 63, 64, 65, 37 and 66. Dear Members of the Alaska Board of Fisheries: Afognak Native Corporation represents Shareholders living in Port Lions village and the City of Kodiak, both small, coastal communities within the Kodiak Archipelago, among nearly 1,200 Shareholders. Afognak has been able to provide strong economic and advocacy support to our Shareholder communities as the 7th largest revenue producing private corporation in the State of Alaska. However, in the face of proposed proposals scheduled to come before the Board regarding Kodiak's Salmon Fishery, we fear that our coastal communities stand to be severely impacted. Specifically, Afognak opposes Proposals 58, 59, 60, 61, 62, 63, 64, 65, 37 and 66. The Board of Fisheries and its decisions on fisheries management and allocation can have and has had tremendous impact on our communities. It is critical for the sustainability and viability of our Kodiak Island's village communities that Board of Fisheries members recognize and understand the impact that decisions have on these small, coastal, fishery-dependent communities. We are concerned about the motivation to change management plans when Kodiak fishermen have not done anything that would justify these changes. Our salmon fishery has not expanded; in fact, there are fewer permits fishing now than were fishing five and ten years ago. We don't see any "new" fisheries for Kodiak salmon developing. Kodiak's management plans cover the entire Island and the Mainland and they only allow fishery openings based on the presence of local stocks. These plans have been in place for more than 25 years and have precluded expansion of salmon fishing that is not based on the presence of local stocks. Further, the 2014-2016 genetic study authored by Kyle Shedd is not "new" information in the sense that the conclusions were not previously known. The genetic study only explores information and conclusions reached by the Department during the 1990-1995 timeframe. Namely, "The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years." Moreover, the percentage of the Cook Inlet runs incidentally captured in the Kodiak fishery during 2014-16 are well within the ranges suggested by these earlier studies. The Cape Igvak Management Plan has been in place for 40 years. The reason for the plan was conservation—to protect Chignik's late run. Prior to the plan, Kodiak fished at Cape Igvak "day for day" when the Chignik fishery was open. While Chignik was fishing on the "early run", it was thought that Kodiak could be impacting the "late run". Consequently, the Cape Igvak management plan ensured both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting 300 Alimaq Drive Kodiak, Alaska 99615 Office: (907) 486-6014 Fax: (907) 486-2514 Kodiak. Kodiak's catch percentage of the Chignik run prior to the Cape Igvak Management Plan was about 15%. Under the plan, Kodiak has averaged about 12% (during years when fishing has occurred). Finally, the conservation aspects of the Cape Igvak Management plan were highlighted with Chignik's recent run failures. Yet, there was no fishing at Cape Igvak. Why change a balanced plan that is accomplishing its intended purposes? In summary, we request the Board of Fish support the survival of our small coastal communities such as Port Lions and Kodiak by taking no action on Proposals 58, 59, 60, 61, 62, 63, 64, 65, 37 and 66. Sincerely, Alisha Drabek, PhD Executive Vice President



Al Cratty III
P.O. Box 1
Old Harbor AK
99643

12/18/19

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

RE: Proposals 63, 64, 65, 66

Dear Chairman Morisky and Board of Fish members:

I am a resident and salmon fisherman from the village of Old Harbor on the Eastside of Kodiak island. I have been fishing salmon in the seine fishery in Kodiak since 1967. I grew up in the village, and have watched the decline in the number of permit holders and fisherman in the Old Harbor community with the changes in fishery management as a result of limited entry and the IFQ program. I respectfully request you **reject proposals 63, 64, 65, and 66.**

These proposals would economically put us out of business. It is increasingly more expensive to operate and this proposal takes away my ability to make a successful business model off of salmon. Our crews don't even want to fish anymore, because it's too expensive to think about getting into the industry, and the amount they make from salmon isn't enough to justify making a life as a salmon fisherman. The Kodiak fishery and incidental harvest of Cook Inlet sockeye varies from year to year as a result of where Kodiak is situated in the Gulf of Alaska.

My real concern is for the future generation. My son and grandchildren are currently involved in the fishery and these proposals create a potential hardship for them to continue the fishing livelihood they have started to create. The future generation doesn't have the access to fishing we grew up with, halibut abundance is down, cod stocks are depressed, crab stocks aren't good and the herring industry has no value. The salmon industry is our primary moneymaker and these proposals threatens the last economic driver for my business and my community.

Respectfully,

Al Cratty III



Al Cratty III
PO Box I
Old Harbor Ak

12/18/19

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 1 15526
Juneau, AK 99811-5526

RE: Proposal 58,59,60,61,62

Dear Chairman Morisky and Board of Fish members:

I am a resident and salmon fisherman from the village of Old Harbor on the Eastside of Kodiak island. I have been fishing salmon in the seine fishery in Kodiak since 1967. I grew up in the village, and have watched the decline in the number of permit holders and fisherman in the Old Harbor community with the changes in fishery management as a result of limited entry and the IFQ program. I respectfully request you **reject** proposals 58, 59, 60, 61, and 62.

The Cape Igvak fishery takes pressure off south end. Old Harbor fisherman used to and still do fish the south end of Kodiak and Ayakulik sections and whenever Igvak opened fishing pressure from nonlocal boats would leave us alone. We used to make a large portion of our seasons during June on south-end stocks. ADFG is doing the job they are mandated to do. They are managing the fishery the way the management plan was designed and as a result the poor runs in Chignik have not been as a result of Kodiak fisherman. There are safeguards put in place to forever protect the Chignik runs, and because of those safeguards, we haven't fished in Igvak over the last 3 years.

Please leave the Cape Igvak fishery alone. Kodiak fisherman have fished over there since before limited entry and our historic harvest in the Igvak section provides economic benefit to my community and our fisherman.

Respectfully,

Al Cratty III



Alec Inga, Sr.
P.O. 83
Old Harbor, AK 99615

December 19, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Vote NO: Proposals 58,59,60,61,62,63,64,37,65,66

To whom it may concern:

I'm an Old Harbor fisherman and have been for most of my life. Fishing is very important for me and my community. Without fishing, I don't know how anyone could afford to live in Old Harbor. I want to see Old Harbor continue to have a fishing fleet. Right now, it's tough. Salmon is all we have. There is no money for herring these days and the cod are gone. It's sad to see all the boats in the harbor with nothing to do.

I oppose taking away the Cape Igvak fishery. Cape Igvak benefits Old Harbor in two ways. First, for the boats that go fish there it can be a good opportunity if the fish are running. Second, for the local boats that stay around Old Harbor when Igvak is open, there are far fewer boats competing for hauling spots. That's why Cape Igvak is a win-win for Old Harbor fishermen.

Regarding the Cook Inlet proposals to limit Kodiak's catch of Cook Inlet bound sockeye. You are not going to be able to control nature. Those Cook Inlet fish come by Kodiak some years and some years they don't. It's not just about sockeye here in Kodiak. Pink salmon and chum salmon are very important to our fishery, especially in the July period targeted by the Cook Inlet proposals. If the board were to close the mainland districts and then move west side fishing inside the capes, we'd have more than twice the boats currently fishing around Old Harbor trying to get a piece of the pie. So, I think closures for Cook Inlet bound fish would hurt Old Harbor and the other rural communities more than any gain by Inlet fishermen.

Most of my friends and family that fish in Old Harbor are just barely making a living. We have some very good fishermen here in Old Harbor and they are wondering if they can continue if the Board were to adopt one or more extreme proposals. I hear their worry and I'm concerned about my crew job. I'm asking you not to adopt proposals 58,59, 60, 61,62,63,64,65,66.

Thank you for reading what I had to say.

Sincerely yours,
Alec Inga, Sr.



Allen Christiansen Sr.
PO Box 134
Old Harbor AK
99643

12/18/19

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

RE: Proposal 58, 59, 60, 61

I am a 59-year old resident of Old Harbor of Alaska, located on the Eastside of Kodiak Island. I grew up in a village of roughly 600 people, that is down to about 150 residents now and our primary moneymaker is commercial fishing. I am a new entrant to the salmon industry, as I just bought a 38-foot salmon seiner, however have been involved in salmon fishing my entire life crewing with family and friends. While I recognize that I am an older entrant, I am concerned with the future of our fisheries and our village, as I have 7 children between the ages of 14 and 40. I bought into the salmon industry to potentially give my kids a reason to come back to Old Harbor. The board needs to **reject proposals 58, 59, 60, and 61.**

The Cape Igvak fishery is a historic part of the Kodiak salmon fishery and has been since before limited entry. Over the years, I have fished the Cape Igvak fishery as a crewman and can say without it, nobody makes any money in June anymore. For the last few years, even the Igvak fishery has been closed as a result of weak runs to Chignik. The economic pinch is felt in our village the same as it is felt in the villages of the Chignik district. Salmon fishing is our primary source of revenue now, and the main supplier of jobs. The Board needs to remember that we are all trying to make a living off of salmon, and the run failures in Chignik are not because Kodiak fisherman are fishing and placing a burden on Chignik stocks. The management plan in the Igvak section doesn't allow us to go fishing until Chignik has already harvested 300,000 sockeye. The Chignik runs will rebound, as all runs always do, but you, the Board have the decision to economically harm the Kodiak fisherman by making changes to the Igvak management plan that has stood the test of time for over 40 years. Please consider leaving the Igvak fishery alone. Reject these proposals as previous boards have done in the past.

Sincerely, 

Allen Christiansen Sr.



Allen Christiansen Sr.
PO Box 134
Old Harbor AK
99643

12/18/19

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 1 15526
Juneau, AK 99811-5526

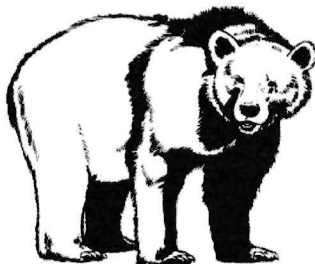
RE: Proposals 63, 64, 65, and 66

I am a 59-year old resident of Old Harbor of Alaska, located on the eastside of Kodiak Island. I grew up in a village of roughly 600 people, that is down to about 150 residents now and our primary moneymaker is commercial fishing. I am a new entrant to the salmon industry, as I just bought a 38-foot salmon seiner, however have been involved in salmon fishing my entire life crewing with family and friends. While I recognize that I am an older entrant, I am concerned with the future of our fisheries and our village, as I have 7 children between the ages of 14 and 40. I bought into the salmon industry to potentially give my kids a reason to come back to Old Harbor. The board needs to **reject proposals 63, 64, 65, and 66.**

These proposals are trying to take away a historical part of the Kodiak salmon fishery. The proposal does not take into account the volume of pink and chum salmon harvested that make up the bulk of the Kodiak fishery. I bought into the industry because at current fishing prices I will be able to pay the bills on my small vessel on pink and chum salmon alone. These proposals will make it hard for me to do that, because it will severely limit the number of available sets for me to fish, and will push every seiner on top of one another. The Kodiak fishery is managed during July under a complex management plan that allows Kodiak fishermen to harvest sockeye, pinks and chums with all different run timings. The Kodiak management plan under changes proposed in these proposals would make it impossible for management to allow for harvest of these local stocks and needs to be rejected. Please leave the Kodiak fishery the way it is.

Sincerely,

Allen Christiansen Sr.



PC507
1 of 1

ALUTIIQ TRIBE OF OLD HARBOR

PO Box 62, Old Harbor AK 99643
Phone: (907)286-2215 fax (907)286-2350

December 27, 2019

Alaska Board of Fisheries
1255 West 8th St.
P.O. Box 115526
Juneau, AK 99811

Re: Maintain Kodiak's Salmon Fishery
Oppose Proposals: 58,59,60,61,62,63,64,65,37 &66

Dear Alaska Board of Fisheries:

I am Conrad Peterson President of the Alutiiq Tribe of Old Harbor and I represent the community of Old Harbor. Our community's economy is entirely based on fishing and on Kodiak's salmon fishery in particular. Loss of salmon fishing opportunities will have a direct impact on Old Harbor.

We wonder what Kodiak fishermen have done that would justify changing our management plans. Our salmon fishery has not expanded, in fact there are fewer permits fishing now than were fishing five and ten years ago. We don't see any "new" fisheries for Kodiak salmon developing. Kodiak's management plans cover the entire Island and the Mainland and they only allow fishing openings based on the presence of local stocks. These plans have been in place for more than 25 years and have precluded expansion of salmon fishing that is not based on the presence of local stocks.

Regarding the proposals from Cook Inlet, the 2014-2016 genetic study authored by Kyle Shedd in not "new" information in the sense that the conclusions were not previously known. The genetic study provides additional snapshots of detail illustrating the information and conclusions reached by the Department during the 1990-1995 time-frame. Namely, **"The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years."** Moreover, the percentage of the Cook Inlet run incidentally captured in the Kodiak fishery during the 2014-16 time period is well with the ranges suggested by these earlier studies.

The Cape Igvak Management Plan has been in place for 40 years. The reason for the plan was conservation --- to protect Chignik's late run. Prior to the plan, Kodiak fished at Cape Igvak "day for day" when the Chignik fishery was open. While Chignik was fishing on the "early run", it was thought that Kodiak could be impacting the "late run". Consequently, the Cape Igvak management plan insured both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting Kodiak. Kodiak's catch percentage of the Chignik run prior to the Cape Igvak Management Plan was about 15%. Under the plan, Kodiak has averaged about 12%. (During years when fishing has occurred.) Finally, the conservation aspects of the Cape Igvak Management plan were highlighted with Chignik's recent run failures. There was no fishing at Cape Igvak! Why change a balanced plan that is accomplishing its intended purposes?

In summary, the Alutiiq Tribe of Old Harbor requests that the Board of Fisheries take no action on Proposals 58, 59,60,61,62,63,64, 65, 37 & 66!

Sincerely,

Conrad Peterson, President



From: [ann kendall](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: comments Kodiak finfish
Date: Friday, December 27, 2019 3:02:54 PM

Dear Board Members,

I am a west side setnetter; my family has gill-netted on the Viekada Bay side of Kupreonof Peninsula since 1979. We are in the unique position to have observed the fishery for over forty years. Although there are patterns and recurring time-tables relating to salmon species in our waters, the most salient fact is that each year brings its own season and rewards.

I support the work of the Kodiak Area Salmon Work Group and urge the Board of Fisheries to read their positions and rationales carefully regarding the proposals coming up in 2020. Their information is reliable, well-researched, and reflects what we fishermen see on the grounds. As you consider these proposals, please be mindful that Alaska's fish, whatever their origin, are "common property" and cannot be managed as if they are "owned" by their river-of-origin fisherman.

[NO on Proposals: 37 and 58, 59, 60, 61, 62, 63, 64, 65, and 66](#)

I am especially concerned about proposed month-long closures during the supposed time-frame Cook Inlet bound sock-eye may travel Kodiak waters. The mixed stock nature of KMA salmon fisheries, including the incidental harvest of non-local, Cook Inlet sockeye stocks, has been known to biologists and fishermen alike for many years. The very transient and changing nature of this incidental harvest does not warrant large swaths of closure during Kodiak's prime fishing; BOF would be cutting our harvest days down by one third to possibly bring a theoretical number of fish to Cook Inlet, maybe. Commercial Cook Inlet fishermen would be well advised to look to curtailing the sports dip net fishery that often benefits Outside tourists. There are no conservation emergencies for salmon and salmon fisheries within the KMA, including non-local sockeye stocks bound for Cook Inlet.

Our own forty years of fish records show occasional and sporadic catches of Cook Inlet sockeye. Since it is impossible to pinpoint when and where and how the weather may affect these fish, is it any wonder the suggestion by the well-funded Cook Inlet sports fishing industry is to close Kodiak area to all salmon fishing for over a month? That is ridiculous. The supposed "data" and studies used to justify this proposal are spotty and incomplete, as the studies themselves state. Please vote NO on these proposals for fair fishery management.

[Proposal # 67 5AAC 18:331 Gillnet Specifications and Operations Allow use of single filament mesh web in a set gillnet](#)

Because of recent slime events, the use of single filament mesh web in a set gillnet will make keeping our nets clean and fishing more efficient. This type of gear is allowed in other



management areas, such Cook Inlet. Please support this proposal.

Proposal #70 5AAC 18:362 Westside Kodiak Salmon Management Plan Karluk Pink Proposal

Because of the large number of pink salmon that often traverse our waters, we need to be able to harvest some of them before there is over escapement in the rivers when the number of fish is high. Support for this proposal will enable fishery biologists to react appropriately.

Proposal #71 5AAC 18:362 Westside Kodiak Salmon Management Plan Inner Bay Proposal

It has been very uncomfortable to watch a closure designed to build up the numbers of fish in inner bays, only to see that build-up immediately caught by seiners allowed deep inside those bays and passes before the salmon have an opportunity to get up their home streams.

Suddenly, the fishery is closed again for everyone. Please support this better management plan for the inner bays that will benefit both seiners and setnetters.

Thank you.

Ann Kendall

outletcape@gmail.com

907-398-7060

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Annie Kendall

Outlet Cape, Viekoda Bay



Benjamin Allen
P.O. Box 84
Chignik, AK 99564

Alaska Board of Fisheries
Board Support Section 20
PO Box 115526
Juneau, AK 99811-5526

Mr. Chairman, and members of the Board,

Your protection of terminal fisheries is highly needed and cannot be stressed enough. The Department of Fish and game can not protect the the stocks let alone the fishery until after damage has been done because regulations supersede, and because these same regulations are the mandate and the default and they are inconsistent across borders.

My name is Benjamin Allen, a resident, fisherman, City Council member, and member of the AC in Chignik. I am writing this letter to bring attention to a situation that is ongoing throughout the salmon fisheries and support the proposals that will help terminal fisheries rebuild and recover, in specific, the Igvak proposals reducing interception of our first run 58-61.

In the inception of the Igvak management plan, the principal idea was to assist a struggling area that was low on their own stocks by giving them the ability to glean off an area with a substantial excess of fish. A 600,000 fish minimum was put into the plan guaranteeing Chignik would not have excessive load on lower years, but it was never foreseen that our stocks would deplete to the level that we would not be able to fish. I also do not believe that the creating boards intention was to put all of the Igvak effort on our first run. Though this plan may have had some merit, it was not the correct way to execute an appropriate fishery, allowing Igvak to fish on our first run at 15% of our total, equates in some years to up as high as 40% of our black lake run and therefore created an overburdening expanded interception fishery. If there were more fish in Chignik then should have been, then more permits or interim permits should've been issued by the CFEC in order to balance the overage. As hindsight is 20/20 the correction now must be made and the Igvak fishery should be dissolved. If stocks in Chignik return to their former glory then more permits should be issued for that area.



The Chignik fishery for the first time in state history in 2018 had no commercial fishery, though it was not the lowest escapement only because the fishermen were restricted from fishing that year, even though a known interception fishery was allowed to continue. Subsequently 2019 had a disastrous first run and a mediocre second run. Between 35 and 45 vessels were fishing at any given time which is a dramatic reduction from the standard 70 permits that are usually fished in Area L. Fishermen are leaving the area, finding new areas to lease or buy permits due to the instability of the fishery. The conservation and rebuilding of runs is coming on the backs of the permit holders in terminal areas. The other negative affect of interception fisheries in our area is that if we don't maintain escapement of our sockeye, then we don't have access to our mixed fish that is afforded to all other areas.

Until there is absolutely no fishing in Area L the ADF&G management can not take any measures to reduce fishing in its current management of Interception areas. Interception fisherman do not understand what is happening to the resource in Chignik as there is no consequential management until the resource heads to becoming a stock of concern. Though each side has the 600,000 harvest preference limitation, it does not afford room for repair while we still maintain a progressing fishery at that level, and needs to be raised. Most importantly these interception areas have other areas within their boundaries that they can prosecute fish; We do not! We have constantly asked the ADF&G to reduce fishing time in interception areas when Chignik is unable to fish due to lack of escapement, and their response has always been, "you must change the regulations in order for us to act, we understand what you are looking for but are bound to just following regulations". Please stop passing the buck between the department and the board. The regulations must be changed to allow the department to protect yield or at least restrict gleaning that reduces long term yield in the terminal area fisheries.

In closing, the load on Chignik bound stocks has now affected the yield that is produced in area L to the degree that the fishermen are having a difficult time surviving. In the meantime by supporting proposals 60 and 61, you will aid Chignik in its recovery.

Best regards,
Benjamin Allen



Brian Koozaata
P.O. 126
Old Harbor, AK 99615

December 18, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Opposition to Proposals 58,59,60,61,62,63,64,37,65,66

Dear Board:

I am a Kodiak salmon fishery crew member and I live in Old Harbor. I was 16 when I started fishing and I have fished each season since. Last year I fished with Travis Berns on a local Old Harbor vessel. Fishing is my primary income. I've been hearing that you may be changing some of the rules for the Kodiak salmon fishery. It's hard enough to live in Old Harbor on my fishing earnings, please don't make changes that will reduce what I can earn from fishing salmon.

There seems to be big concerns about catching Cook Inlet fish in the Kodiak area. I don't see that this is really an issue. From what I see, Cook Inlet sockeye are here some years and not here in other years. It's a hit a miss type of deal. Why would you close an area every year when Cook Inlet fish are only in that area occasionally?

My skipper will go fish at Cape Igvak sometimes when it is open. Recently, we haven't been over there because the Chignik run hasn't been so good. I think that's how it's suppose to work, when the Chignik run is weak we don't get to fish. So what's broken with the Igvak management plan that would make the Board change a plan that has been in place for 40 years?

I'm not the guy that understands all the technical stuff the Board goes through. I just know that the things the people say in the proposals from Chignik and Cook Inlet are not true. It's clear that they don't understand the Kodiak fishery or they are just saying things to justify a bad proposal.

Thank You,

Brian Koozaata



NW setnetter

From:

[BRIANA SPRINGER](#)

To:

[DFG, BOF Comments \(DFG sponsored\)](#)

Subject:

Date:

Thursday, December 26, 2019 5:08:44 PM

Dear Chairman and BOF members,

As a 25+ year setnetter fisherman in the Central area of Kodiak I am worried and reject proposals 37, 58-66

I truly hope you look at the facts and concerns of my fellow NW setnetters and reject the proposals as well

I am very concerned with the Cook Inlet proposals 37, 58-66.

The umbrella concept and or 4 week blanket closures [from June 25-July 28](#) where 65-69% of our total income is caught would be devastating to our family! Not only personally, but our community would be facing catastrophic economic disaster! From processors to cannery workers, and all Kodiak businesses would be severely negatively impacted by proposals that have such limited substance to a historical fishery other than "I want more"!

Closures will force the seine fleet into already congested areas, and with NO regulations for the co-existence of seine/setnet, we as setnetters will lose even more than we do now. Already at various times due to other area closures we are "shut down" by seiners setting on both sides of our gear and at times double setting! That is almost 2/3 of a mile blocking off all fish to our 150 fathom net. The result of a forced increase in the seine fleet to our area due to the proposed Cook Inlet closures will be the END of our livelihood.

Forced closures will devastate our local runs from overescapement and the quality will plummet. As seiners are the only one allowed into the inner bays, all Westside setnetters will lose.

This is a terrible precedent to set. Salmon are considered "common property" and do not "belong to" the management area where they were born.

By disrupting one areas fishery to give the advantage to another area will have statewide repercussions as other areas jump on the "THEY'RE MINE" bandwagon!

Kodiak fisheries is a historical fishery. We are not fishing in any new areas. The same species come and go year after year. But every year is different! The Westside sees very few Cook Inlet fish when the wind blows easterly. There is no way to determine what the weather and run will be year after year.

Thank you for your considerations.

Briana Springer

NW setnetter

Sent from Briana's iPad



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 26, 2019

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

RE: Opposed to Proposals 58, 59, 60, 61

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries. Salmon fishing is the mainstay of our commercial fishing business and without it we would not have the financial means to stay in Kodiak, maintain a vessel and prosecute other fisheries. We own a 42', shallow draft seine vessel that primarily operates in the Alitak district. Our son now runs the boat and Charles and I run a setnet site in Alitak Bay. We choose to diversify our salmon fishing with participation in both the seine and setnet fishery so our son can run the boat with his crew and the rest of the family can prosecute the fishery from a shore-based operation.

We are adamantly opposed to proposals 58, 59, 60 and 61 and encourage the board to vote this suite of proposals down and maintain the existing Cape Igvak Management Plan. The Cape Igvak Management Plan represents a forward-thinking management plan which has conservation measures for Chignik fisheries built into the plan. As structured, the plan only allows for harvest in the Cape Igvak region after a 300,000 fish escapement into Chignik. It is important to recognize that the run failures in the Chignik area in 2018 were not a result of harvest at Cape Igvak as the fishery did not open due to the conservation measure built in. On average, the Kodiak fleet harvests about 12.5% of the 15% allocation and the proposed proposals are purely allocative as they each seek to curtail this important harvest opportunity to a fleet four times the size of the Chignik fleet. This is not a new or expanding fishery, the fishery is managed to a percentage regardless of the number of boats and the strength and success of the mangment plan is evident in area managers ability to keep the harvest consistently within the allocation. To reiterate, the Cape Igvak Management Plan was designed to support Chignik reaching its escapements and is an example of a mixed stock fishery management plan working as intended.

Sincerely,

Charles and Theresa Peterson



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 26, 2019

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

RE: Opposed to Proposals 63, 64

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries. Salmon fishing is the mainstay of our commercial fishing business and without it we would not have the financial means to stay in Kodiak, maintain a vessel and prosecute other fisheries. We own a 42', shallow draft seine vessel that primarily operates in the Alitak district. Our son now runs the boat and Charles and I run a setnet site in Alitak Bay. We choose to diversify our salmon fishing with participation in both the seine and setnet fishery so our son can run the boat with his crew and the rest of the family can prosecute the fishery from a shore-based operation.

We are adamantly opposed to proposals 63 and 64 and we encourage the board to vote these proposals down and maintain the existing management plans for Cape Igvak and the Mainland District. The proposals lack comprehensive science-based information to base sound decisions for fisheries management. In terms of proposal 63, establishing zones to protect Chinook salmon, there is no scientific information to demonstrate there would be savings to Chinook salmon with these restrictions and local knowledge suggest Chinook dive in deeper water. While the status of Chinook stocks throughout the Gulf of Alaska is concerning, restrictions to harvest in one district with hopes another area will benefit does not adhere to the mixed stock fish policy and the need to manage close to areas of concern. The proposals do not consider the unintended consequences to the Kodiak area when fishermen are targeting chum and pink salmon. The loss would be significant and the gains unknown. It is important to recognize the scope of the Kodiak salmon fisheries and the dependence of the harvesters on sockeye, chum and pink fisheries. When proposals such as these come forward there is a complete lack of understanding of lost harvest opportunity on local stocks. The Kodiak fleet has not been expanding and has a similar number of participants over the last decade. Fishing patterns are established and are limited by fishing grounds. There have always been Cook Inlet bound fish harvested around Kodiak by a fleet targeting local Kodiak stocks. It is inherent in sustainable fisheries management and consistent with the mixed stock management policy. In order to reduce potential targeting of Cook Inlet bound stocks, the North Shelikof Sockeye Management Plan was established in 1989 to address interception.

We encourage Board of Fisheries members to stay consistent and adhere to mixed stock fisheries policies which have been an integral component of sustainable fisheries management.

Sincerely,

Charles and Theresa Peterson



Charles P. Fogle

5722 Campbell Lake Road

Anacortes WA. 98221

12/26/2019

RE: Proposals 37, and 58-66

Dear Chairman Morisky and Board of Fish Members,

My name is Charles Fogle and I have been running a salmon boat in Kodiak 35 years. In that time I have upgraded my boat and gear several different times and now have several million dollars invested in my fishing operation. I have invested in the Kodiak area because it is a sustainable fishery with its current management tools in place. We have our good years and bad years like every other area throughout the state. The difference is that we don't blame other people when our local river systems fluxuate and sometimes even fail. The following proposals have zero historical, biological, scientifically and economical, factors that would justify the Board making changes to Kodiak's management plans.

I respectfully request the Board reject proposal #63, 64, and 65. These proposals are targeted at the Cape Igvak Fishery in Kodiak. These areas do not open if Chignik doesn't have minimum escapement and this plan has proved to be successful. When Chignik's run is low Kodiak doesn't get to fish in Igvak. This was evident this year as we did not fish at Igvak during June, and July. Recent run failures in Chignik have nothing to do with Kodiak Fishery. They have spawning problems in there lakes. This is a known fact that there lakes are getting silted in and other factors from Mother Nature are affecting their returns just like some of our systems in Kodiak have had complete run failures as well.

I urge you to decline proposals #58, 59, and 61 as well. No research or stock assessment justifies the reduction of Kodiak's Cape Igvak fishery to 5%. This is a fictitious number with no scientific justification. Kodiak's 15% allocation was an approximation of Kodiak's historical harvest in the years before the Cape Igvak fishery plan in 1978. Long time average is below the 15% allocation at only 1205% during the years we even get to fish cape igvak. Likewise, proposals for change to the start date and guarantee minimum catch for Chignik are arbitrary benchmarks seeking reallocation without any justification.

Please decline proposal #37 as well. Chinook stocks are depressed across the Gulf of Alaska. Kodiak is already returning most of the Chinook salmon alive. Moreover, the very small % of Chinook caught in Kodiak are in fact from our own local systems Karluk and Ayakulik. Reducing Kodiaks salmon



fishery is not going to benefit other areas Chinook resource. Our Chinook systems have declined on a parallel curve that is similar to the decline in other system throughout the state.

In closing, when looking at the Boards allocation criteria, there is simply isn't anything historically, or scientifically that would justify the Board making changes to Kodiak's management plan.

Thank you for your time

A handwritten signature in red ink that reads "Charles P. Fogle".

Charles P. Fogle

907-230-7977



December 27, 2019

George Anderson

Chignik Intertribal Coalition

PO Box 9, Chignik Lagoon, AK 99565

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Subject: CFEC Report for Chignik

Dear Alaska Board of Fisheries,

Since CFEC will not be presenting the Board with a CFEC report on Chignik fisheries, and because the Cape Igvak plan naturally raises questions about how Chignik salmon fleet compares to the Kodiak fleet, attached is Chapter 1 of from CFEC Report Number 19-1N January, 2019. This CFEC report was presented during the Chignik/Area M meeting in February of 2019 so the report is the most recent available but obviously will not include any information about the 2019 season. Kodiak references will be from the 2017 Board meeting since the 2020 information is not yet available.

Chignik's average ex-vessel value for salmon species, 1975 - 2017 is 84.2% sockeye, 6.9% pink, 4.4% Coho, 4% chum, and 0.4% Chinook. The Kodiak seine fleet averages 39.9% of its ex-vessel value from sockeye with 45.6 percent dependence on pink salmon. Chignik is much more dependent on sockeye than Kodiak.

83.6% of the Chignik fleet are Alaska residents with more than half residents of the Chignik area. Kodiak is 82.4% Alaska resident with the majority being within the Kodiak Borough.

Chignik latency rates were virtually 0% during the eighties and the first half of the nineties but latency rates of 20% to 25% are now typical in recent years - except 2018 when the latency shot up to 93.3% because of the disastrous fishery. Latency rates in Kodiak during the eighties were typically in the 20% to 30% range (oil spill year 1989 being an exception) and latency rates in recent years are in the 50% go 60% range. In 2015 Chignik has 91 total permits issued while Kodiak had 372.



CFEC estimates average real earnings (i.e. adjusted for inflation) as \$720,691 for Chignik and \$220,277 for Kodiak in 1977 & 1978 when the Board instituted the Cape Igvak Management plan. In 2015, Chignik's 5-year-average average earnings was \$267,158 and for Kodiak \$243,952. So at the beginning of the Cape Igvak Management Plan (CIMP) the average Chignik fishermen were making well over triple Kodiak average, but by 2015 the fisheries are roughly on par with each other. This in itself would justify abolishing the Cape Igvak Management Plan, but in the light of what has happened to the Chignik fishery since 2015 wherein Chignik's early run has failed repeatedly, causing severe economic hardship in the Chignik salmon fishery and all five of the Chignik fishery-dependent villages, reducing the impact of the Cape Igvak Management Plan is well justified.

Attached is Chapter 1 of the Chignik CFEC report number 19-1 N January, 2019. The full report is online at <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=02-21-2019&meeting=anchorage>. And the Kodiak CFEC report is online at <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=01-10-2017&meeting=kodiak>

I have limited my comparisons between Kodiak and Chignik to the years available in the 2017 Kodiak CFEC report. The last few years have degraded Chignik's standing substantially to Kodiak's and expectedly this will be evident in a new CFEC report that will be available for your January 2020 Board of Fisheries meeting in Kodiak.

Sincerely,

George Anderson

Chignik Intertribal Coalition



Chapter 1 Chignik Salmon Purse Seine Fishery

S01L Permit Holdings

Limited entry permits for the Chignik salmon purse seine fishery (S01L permits) were issued starting in 1975. CFEC has issued 91 S01L permits. Table 1-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 35.2% (32/91) of the permits, Nonlocal Alaskans received 44.0% (40/91) of the permits, and Nonresidents received 20.9% (19/91). Every permit issued in this fishery was a transferable permit.

Table 1-1. Initial Issuance and Year-end 2017 Totals of Chignik Salmon Purse Seine Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

INITIAL ISSUE			TRANSFERS		MIGRATIONS		CANCELLED		2017 YEAR-END	
Residency	Total	Percent	Change	Percent Change from Initial	Change	Percent Change from Initial	Change	Percent Change from Initial	Total	Percent
Local	32	35.2%	2	6.3%	5	15.6%	0	0.0%	39	42.9%
Nonlocal	40	44.0%	10	25.0%	-13	-32.5%	0	0.0%	37	40.7%
Nonresident	19	20.9%	-12	-63.2%	8	42.1%	0	0.0%	15	16.5%
Total	91	100.0%	0	0.0%	0	0.0%	0	0.0%	91	100.0%

The number of permits held by each resident type can change for three reasons: permits can be transferred to other resident types (transfer); permit holders can move from one location to another (migration); or permits can be cancelled (such as when a permit holder does not pay the renewal fee for two consecutive). This table indicates the extent to which these factors have contributed to net changes in permit holdings in this fishery.

From 2002 to 2005, the majority of S01L permit holders participated in a cooperative as established in the Chignik Area Cooperative Purse Seine Salmon Fishery Management Plan. The cooperative was repealed prior to the start of the 2006 commercial salmon season. From 2002 to 2004, the cooperative resulted in fewer permits used in the fishery as the earnings were spread among members of the cooperative, some of whom received benefits without fishing their permits. In 2005, the cooperative required all of its members to physically participate in the fishery. Please refer to the Alaska Department of Fish Game Fishery Management Report No. 07-56 for more information pertaining to this cooperative.

Exceptionally poor conditions existed in the 2018 Chignik Fishery, and led to a declaration of economic disaster for the region local to the fishery². When and where possible, this report provides summary statistics for the harvests and earnings made in 2018 in the fishery. Although the 2018 data are preliminary as of this writing, presenting the data serves to illustrate the exceptionally poor conditions found in the fishery in 2018 when compared to previous years of the fishery.

² State of Alaska Office of the Governor. Press Release 18-103, August 23, 2018.



Transfers of S01L Permits

Under the Limited Entry Act's terms of free transferability, permits may be sold, traded, given away, or inherited. CFEC requires the completion of a survey with each transfer.³ The surveys provide information such as transfer acquisition methods, the relationship between individuals in the transaction, and the sale amount for instances when the permit is sold.

Table 1-2. Transfer Acquisition Methods for Chignik Salmon Purse Seine Permits, 1980-2017

Acquisition Method	Chignik Salmon Purse Seine		Statewide Salmon Purse Seine		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent
<i>Gift</i>	85	41.9%	1,178	31.6%	13,825	36.5%
<i>Sale</i>	106	52.2%	2,352	63.1%	22,262	58.8%
<i>Trade</i>	1	0.5%	64	1.7%	520	1.4%
<i>Other</i>	11	5.4%	133	3.6%	1,225	3.2%
Total	203		3,727		37,832	

Table 1-2 compares and contrasts transfer acquisition methods for the S01L permits, statewide salmon purse seine permits, and all limited entry permits between 1980 and 2017. Just over a two-fifths of all S01L permit transfers were gifts (41.9% or 85/203), more than half of all transfers were sales (52.2%, or 106/203), and a smaller percentage were trades (0.5% or 1/203) or other (5.4% or 11/203). The annual acquisition methods for S01L permits can be viewed in a different publication.⁴

Table 1-3. Relationships of Transferor to Transfer Recipients for Chignik Salmon Purse Seine Permits, 1980-2017

Relationship	Chignik Salmon Purse Seine		Statewide Salmon Purse Seine		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent
<i>Business Partner/Friend</i>	21	10.3%	672	18.0%	6,992	18.5%
<i>Member of Immediate Family</i>	102	50.2%	1,192	32.0%	12,802	33.8%
<i>Other Relative</i>	7	3.4%	146	3.9%	1,743	4.6%
<i>Other</i>	73	36.0%	1,717	46.1%	16,295	43.1%
Total	203		3,727		37,832	

Table 1-3 shows the relationships between transferors and transfer recipients for S01L permits, and compares S01L permit transfers with statewide salmon purse seine permits, and all limited entry permits from 1980 to 2017. Transfers within the family, both immediate family members and other relatives, total 53.7% (109/203) of all transfers. This compares to 35.9% (1,338/3,727) for statewide salmon purse seine permits, and 38.4% (14,545/37,832) for all limited entry permits statewide.

³ CFEC implemented the transfer survey in 1980.

⁴ See *Changes in the Distribution of Alaska's Commercial Fisheries Entry Permits, 1975-2017*, CFEC Report No. 18-2N.



Emergency Transfers of S01L Permits

Commercial landings can be made with either permanently-held permits or with permits held temporarily through emergency transfers. Emergency transfers (ET) of permits are granted if illness, disability, death, required military or government service, or other unavoidable hardship of a temporary, unexpected, and unforeseen nature prevents the permanent permit holder from participating in the fishery. "Hardship" does not include the results of a permit holder's own economic decisions, or the results of economic, biological or regulatory variables which are normally part of the risk of doing business as a fisherman. At the end of the year, ET permits automatically revert back to the permanent permit holder.

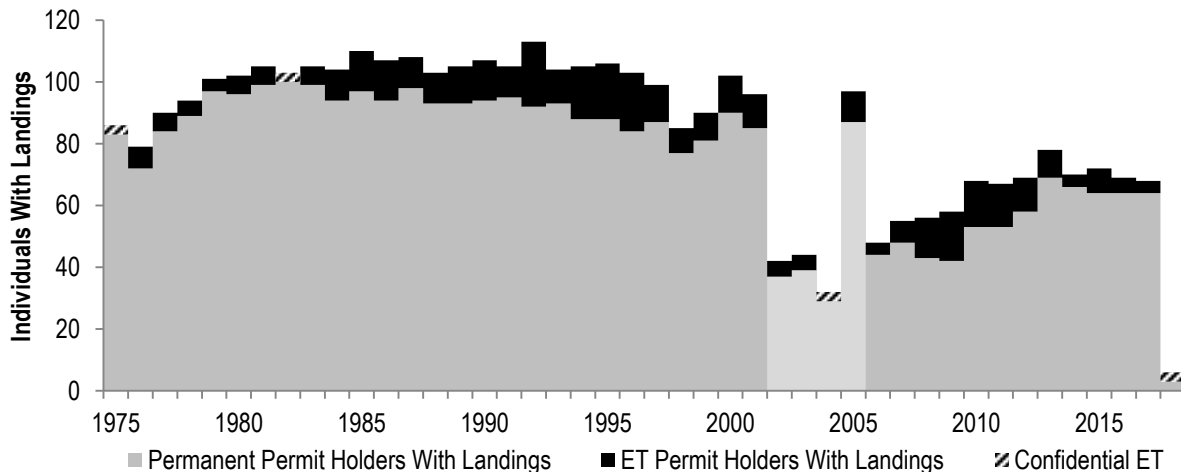
Table 1-4 and Figure 1-1 show the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. Some individuals who made landings with ET permits also made landings with permanent permits in the same year.

Table 1-4. Use of Emergency Transfer Permits in the Chignik Salmon Purse Seine Fishery, 1975-2018

Year	Individuals With Landings	ET Permit Holders With Landings	ET Rate	Year	Individuals With Landings	ET Permit Holders With Landings	ET Rate	Year	Individuals With Landings	ET Permit Holders With Landings	ET Rate
1975	86	1 to 3	-	1990	107	13	12.1%	2005	97	10	10.3%
1976	79	7	8.9%	1991	105	10	9.5%	2006	48	4	8.3%
1977	90	6	6.7%	1992	113	21	18.6%	2007	55	7	12.7%
1978	94	5	5.3%	1993	104	11	10.6%	2008	56	13	23.2%
1979	101	4	4.0%	1994	105	17	16.2%	2009	58	16	27.6%
1980	102	6	5.9%	1995	106	18	17.0%	2010	68	15	22.1%
1981	105	6	5.7%	1996	103	19	18.4%	2011	67	14	20.9%
1982	103	1 to 3	-	1997	99	12	12.1%	2012	69	11	15.9%
1983	105	6	5.7%	1998	85	8	9.4%	2013	78	9	11.5%
1984	104	10	9.6%	1999	90	9	10.0%	2014	70	4	5.7%
1985	110	13	11.8%	2000	102	12	11.8%	2015	72	8	11.1%
1986	107	13	12.1%	2001	96	11	11.5%	2016	69	5	7.2%
1987	108	10	9.3%	2002	42	5	11.9%	2017	68	4	5.9%
1988	103	10	9.7%	2003	44	5	11.4%	2018*	6	1 to 3	-
1989	105	12	11.4%	2004	32	1 to 3	-				

- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004.
- 2018 data is preliminary.

Figure 1-1. Use of Emergency Transfer Permits in the Chignik Salmon Purse Seine Fishery, 1975-2018





Latent S01L Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they actually fish. Permits that are not used (don't record landings) in a given year are referred to herein as "latent" permits for that year.

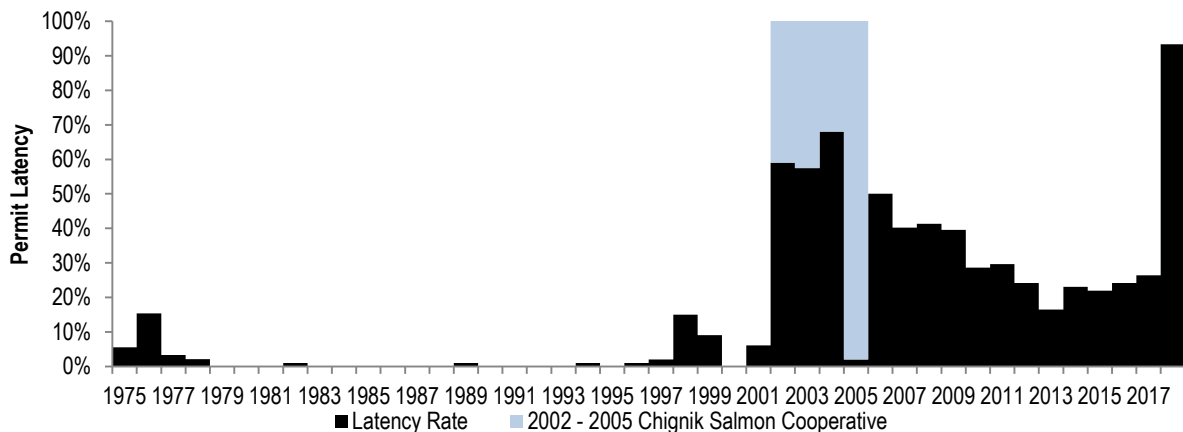
Table 1-5 indicates the total number of viable S01L permits issued each year, the number of permits fished (with commercial landings), and the rate of permit latency. Viable permits include both interim entry and permanent permits. Note that for this table, in years when a single individual held an interim-entry permit and was also issued a permanent permit, only the permanent permit is counted. The rate of latency is depicted in Figure 1-2. There are many reasons why an individual might not fish in any given year. This table and figure do not explain any of these reasons.

Table 1-5. Chignik Salmon Purse Seine Permit Latency, 1975-2018

Year	Permits		Latency Rate	Year	Permits		Latency Rate	Year	Permits		Latency Rate
	Issued	Fished			Issued	Fished			Issued	Fished	
1975	91	86	5.5%	1990	101	101	0.0%	2005	99	97	2.0%
1976	91	77	15.4%	1991	101	101	0.0%	2006	96	48	50.0%
1977	91	88	3.3%	1992	101	101	0.0%	2007	92	55	40.2%
1978	95	93	2.1%	1993	102	102	0.0%	2008	92	54	41.3%
1979	101	101	0.0%	1994	100	99	1.0%	2009	91	55	39.6%
1980	101	101	0.0%	1995	100	100	0.0%	2010	91	65	28.6%
1981	102	102	0.0%	1996	101	100	1.0%	2011	91	64	29.7%
1982	102	101	1.0%	1997	100	98	2.0%	2012	91	69	24.2%
1983	100	100	0.0%	1998	100	85	15.0%	2013	91	76	16.5%
1984	100	100	0.0%	1999	99	90	9.1%	2014	91	70	23.1%
1985	101	101	0.0%	2000	99	99	0.0%	2015	91	71	22.0%
1986	100	100	0.0%	2001	98	92	6.1%	2016	91	69	24.2%
1987	102	102	0.0%	2002	100	41	59.0%	2017	91	67	26.4%
1988	101	101	0.0%	2003	101	43	57.4%	2018*	90	6	93.3%
1989	101	100	1.0%	2004	100	32	68.0%				

- When an individual with an interim-entry permit is issued a permanent permit in the same year, only the permanent permit is counted in the above table.
- 'Permits Fished' is the number of CFEC permits that were used to record commercial landings in that year.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004.
- 2018 data is preliminary.

Figure 1-2. Chignik Salmon Purse Seine Permit Latency Rate, 1975-2018





New Entrants into the Chignik Salmon Purse Seine Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S01L permit. It is important to note that initial permit holders are not considered new entrants because they needed a proven fishing history prior to 1975 in order to become an initial permit holder. Individuals who only make landings on an emergency transfer or interim-entry permit for any given year are not considered in this table.

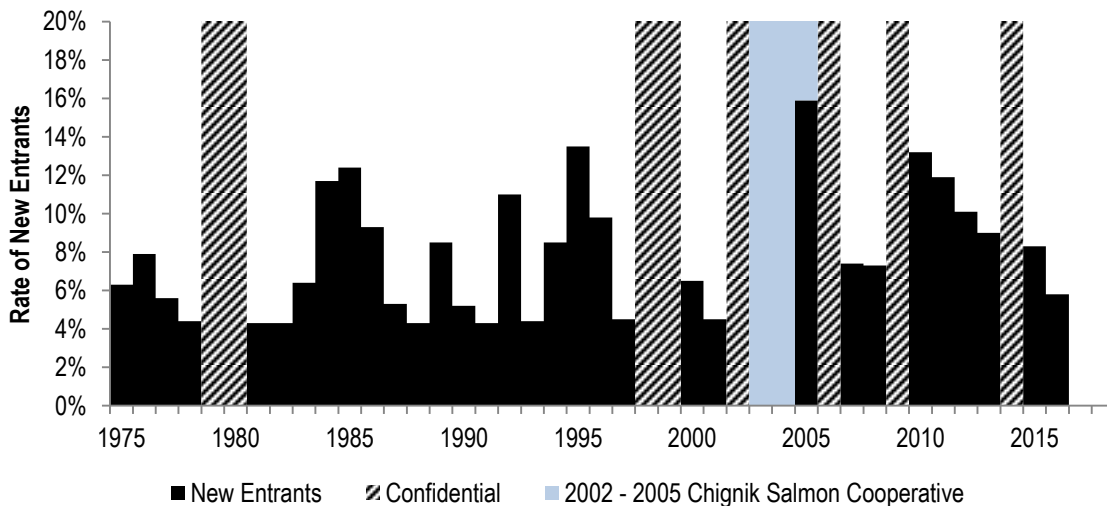
Table 1-6 and Figure 1-3 describe individuals rather than permits. An individual may hold up to two permits in this fishery, but can only fish one of them. An individual may hold one S01L permit one year, and then in subsequent years hold a different S01L permit. Likewise, individuals may enter and exit the fishery multiple times over the years. Individuals are only counted once as a new entrant and only in the year in which they made their first documented landing on a permanent permit.

Table 1-6. New Entrants into the Chignik Salmon Purse Seine Fishery, 1975-2018

Year	Individuals w/Landings	New Entrants Count	Percent	Year	Individuals w/Landings	New Entrants Count	Percent	Year	Individuals w/Landings	New Entrants Count	Percent	Year	Individuals w/Landings	New Entrants Count	Percent
1975	80	5	6.3%	1986	97	9	9.3%	1997	89	4	4.5%	2008	55	4	7.3%
1976	76	6	7.9%	1987	95	5	5.3%	1998	76	1 to 3	-	2009	58	1 to 3	-
1977	89	5	5.6%	1988	92	4	4.3%	1999	82	1 to 3	-	2010	68	9	13.2%
1978	90	4	4.4%	1989	94	8	8.5%	2000	93	6	6.5%	2011	67	8	11.9%
1979	90	1 to 3	-	1990	96	5	5.2%	2001	88	4	4.5%	2012	69	7	10.1%
1980	91	1 to 3	-	1991	93	4	4.3%	2002	37	1 to 3	-	2013	78	7	9.0%
1981	93	4	4.3%	1992	100	11	11.0%	2003	39	0	0.0%	2014	70	1 to 3	-
1982	92	4	4.3%	1993	91	4	4.4%	2004	29	0	0.0%	2015	72	6	8.3%
1983	94	6	6.4%	1994	94	8	8.5%	2005	88	14	15.9%	2016	69	4	5.8%
1984	94	11	11.7%	1995	96	13	13.5%	2006	45	1 to 3	-	2017	68	0	0.0%
1985	97	12	12.4%	1996	92	9	9.8%	2007	54	4	7.4%	2018*	6	0	0.0%

- This table excludes individuals with interim-entry and emergency transfer permits.
- Data is masked for confidentiality when fewer than four individuals are included in the count.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004.
- 2018 data is preliminary.

Figure 1-3. Rate of New Entrants into the Chignik Salmon Purse Seine Fishery, 1975-2018





Age of S01L Permit Holders

Table 1-7. Mean Age of Select CFEC Permit Holders and the General Alaskan Population

Year	S01L	Statewide Salmon Purse Seine	Statewide All Permits	Mean AK Worker Age
1980	44.5	42.3	38.9	33.4
1981	44.5	42.4	39.9	33.5
1982	43.7	42.2	40.0	33.6
1983	44.5	41.9	40.2	33.7
1984	43.8	42.1	40.4	33.8
1985	43.8	42.6	40.8	34.0
1986	43.8	42.5	41.0	34.2
1987	44.8	42.5	40.9	34.5
1988	45.0	42.7	41.2	34.9
1989	44.1	42.8	41.5	35.3
1990	44.0	43.2	42.0	35.5
1991	43.9	43.5	42.5	35.9
1992	44.9	44.0	42.9	36.2
1993	43.7	44.6	43.5	36.5
1994	43.6	45.0	44.0	36.7
1995	43.4	45.4	44.4	37.0
1996	43.3	45.8	44.8	37.2
1997	43.5	46.4	45.1	37.4
1998	45.0	46.8	45.6	37.6
1999	46.0	47.2	46.0	37.8
2000	46.2	47.3	46.4	37.9
2001	47.3	48.0	46.9	38.1
2002	47.9	48.5	47.4	38.3
2003	49.1	49.4	47.9	38.4
2004	49.9	50.1	48.2	38.6
2005	50.4	50.6	48.4	38.7
2006	51.7	51.1	48.7	38.8
2007	52.6	51.5	48.9	38.9
2008	52.5	51.1	49.0	39.0
2009	53.2	51.3	49.3	39.1
2010	52.7	51.4	49.5	39.2
2011	52.1	51.3	49.6	39.4
2012	52.6	51.4	49.8	39.4
2013	51.4	51.2	50.0	39.5
2014	52.1	51.0	50.2	39.5
2015	53.0	51.4	50.6	39.5
2016	53.2	52.0	50.9	39.6
2017	53.6	52.4	51.3	39.6

- Mean AK Worker Age is the annual average age of all Alaskans age 16-64 as reported by the Alaska Department of Labor and Workforce Development, Research and Analysis Section.
- Age data from the CFEC permit file is as of December 31st of each year.

Table 1-7 shows the annual mean age of four different cohorts of people: 1) Chignik Salmon Purse Seine (S01L) permit holders; 2) statewide salmon purse seine permit holders 3) all CFEC limited entry permit holders; and 5) the Alaskan worker age population.

Note that these figures include ages of permit holders for both transferable and non-transferable permits; however, there were no non-transferable S01L permits issued. Some individuals hold permits in more than one fishery; in these cases, the age of the permit holder is counted once for each permit that he or she holds.

The mean age of the general Alaskan worker age population has increased 6.1 years between 1980 and 2017, which represents an 18.4% increase. The percent change in ages over the same period for all CFEC permit holders was 31.7% (12.4 years), and 23.7% (10.0 years) for the statewide salmon purse seine permit holders.

For S01L permit holders, the mean age increased 20.5% (9.1 years).



S01L Permit Value

Many permit transfers are non-monetary transactions (see Table 1-2). Table 1-8 considers solely arms-length market transactions where permits are sold. CFEC estimated values are expressed in both nominal and real (adjusted for inflation) terms.

Table 1-8. CFEC Estimated Value of Chignik Salmon Purse Seine Permits

Year	S01L Permit Sales	Nominal		Real	
		Permit Value	Standard Deviation	Permit Value	Standard Deviation
1984	4	\$322,500	-	\$760,839	-
1985	3	\$321,233	-	\$731,790	-
1987	0	\$315,667	-	\$681,129	-
1988	2	\$360,000	-	\$745,927	-
1989	2	\$371,667	-	\$734,702	-
1990	2	\$416,667	-	\$781,434	-
1991	2	\$409,400	\$58,450	\$736,800	\$105,193
1992	2	\$403,100	\$11,450	\$704,261	\$20,004
1993	2	\$349,800	\$87,800	\$593,377	\$148,938
1994	3	\$238,300	\$58,650	\$394,144	\$97,006
1995	6	\$228,300	\$11,250	\$367,197	\$18,094
1996	4	\$194,500	\$5,250	\$303,861	\$8,202
1997	6	\$188,300	\$11,500	\$287,577	\$17,563
1998	0	\$185,500	\$12,800	\$278,956	\$19,249
1999	4	\$158,800	\$48,700	\$233,644	\$71,653
2000	3	\$200,000	\$46,900	\$284,692	\$66,760
2001	1	\$185,800	\$43,250	\$257,161	\$59,861
2002	1	\$186,600	\$37,500	\$254,249	\$51,095
2003	4	\$179,500	\$9,800	\$239,125	\$13,055
2004	1	\$182,000	\$4,950	\$236,166	\$6,423
2005	5	\$159,600	\$26,200	\$200,313	\$32,883
2006	3	\$146,500	\$28,150	\$178,125	\$34,227
2007	1	\$131,500	\$12,350	\$155,459	\$14,600
2008	3	\$91,300	\$22,500	\$103,944	\$25,616
2009	4	\$70,800	\$8,100	\$80,893	\$9,255
2010	8	\$78,400	\$11,150	\$88,131	\$12,534
2011	4	\$95,100	\$4,100	\$103,632	\$4,468
2012	2	\$97,600	\$2,750	\$104,200	\$2,936
2013	4	\$186,300	\$26,250	\$196,027	\$27,621
2014	4	\$211,300	\$22,500	\$218,783	\$23,297
2015	1	\$227,500	\$14,450	\$235,278	\$14,944
2016	3	\$167,200	\$55,450	\$170,762	\$56,631
2017	0	\$167,200	\$55,450	\$167,200	\$55,450
2018	1	\$136,400	\$21,800	\$133,154	\$21,281

- Permit values represent averages of all arms-length sale transactions over the year. Beginning in 1991, additional data from recent months in the preceding year may be included until at least four observations can be averaged.
- The Standard Deviation was not calculated prior to 1991.
- Real permit values were calculated using the 2017 Consumer Price Index from the U.S. Bureau of Labor Statistics.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004. Average Earnings will not properly reflect estimated earnings by permit holder or vessel for these years.



Chignik Salmon Purse Seine Vessel Characteristics

Table 1-9 reports on various vessel characteristics of the Chignik salmon purse seine fleet since 1978. Reported in this table are the age, length, horsepower, hold refrigeration, and hold capacity. This data is from the vessel license file which includes voluntarily supplied information on vessels. The first column of each category is the count of vessels with the described characteristics; other statistics reported include the 25th percentile, median, and 75th percentile.

Table 1-9. Chignik Salmon Purse Seine Vessel Characteristics

Year	Vessel Count	Age				Length				Horsepower				Refrigeration			Hold Capacity			
		Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	Count	%	Count	25%	Median	75%
1978	95	91	1	6	15	89	33	35	38	90	110	200	270	85	0	0.0%	32	300	400	500
1979	109	101	1	6	14	103	33	36	38	98	120	210	280	93	0	0.0%	34	350	400	600
1980	103	93	2	3	9	94	34	38	40	85	150	230	290	85	1	1.2%	32	400	500	965
1981	103	96	2	4	9	96	35	38	42	91	190	250	300	90	2	2.2%	33	400	500	700
1982	103	98	3	4	8	99	36	38	42	93	210	260	300	94	3	3.2%	33	400	600	925
1983	98	95	4	5	10	95	36	38	42	91	210	260	307	89	2	2.2%	34	400	600	750
1984	102	101	5	6	11	101	36	38	42	99	200	260	307	97	4	4.1%	41	400	600	800
1985	103	100	6	7	12	101	36	38	42	99	210	260	330	97	4	4.1%	41	500	700	980
1986	104	103	6	8	12	103	36	38	42	101	210	270	325	99	5	5.1%	39	400	650	925
1987	104	104	7	9	12	104	38	39	42	100	213	278	343	102	4	3.9%	42	500	700	800
1988	109	108	7	10	13	108	38	41	44	105	230	280	343	105	4	3.8%	45	500	700	800
1989	106	106	8	10	12	106	38	42	46	104	230	300	395	101	6	5.9%	44	520	710	1,000
1990	101	101	8	11	13	101	38	42	46	99	238	310	453	97	5	5.2%	45	600	800	1,000
1991	105	105	6	12	14	105	38	42	47	103	250	326	540	101	11	10.9%	46	600	800	1,000
1992	102	102	6	13	15	102	38	42	47	100	259	335	545	97	11	11.3%	46	600	800	1,000
1993	104	104	7	14	16	104	38	42	47	102	270	340	550	100	15	15.0%	50	540	800	1,000
1994	101	101	8	14	16	101	38	42	47	99	270	340	550	94	17	18.1%	46	540	800	1,000
1995	103	103	7	15	17	103	38	42	48	98	250	326	550	93	23	24.7%	49	500	800	1,000
1996	102	102	8	16	18	102	40	44	48	97	258	350	550	91	24	26.4%	47	500	800	1,000
1997	99	99	9	17	19	99	40	44	48	94	258	347	585	88	23	26.1%	45	500	800	1,000
1998	85	85	13	19	21	85	38	42	47	80	250	326	550	75	15	20.0%	33	400	800	950
1999	93	92	13	20	21	92	38	43	48	87	250	340	550	82	21	25.6%	40	400	800	1,000
2000	100	100	13	20	22	100	41	46	50	95	270	350	585	90	27	30.0%	47	500	800	1,000
2001	92	92	15	22	23	92	40	45	48	87	275	343	550	82	23	28.0%	43	500	812	1,000
2002	42	42	16	22	24	42	40	44	48	41	280	350	550	39	8	20.5%	16	500	800	975
2003	45	45	19	24	25	45	40	44	47	42	270	338	550	40	6	15.0%	14	480	745	950
2004	34	34	19	24	26	34	40	42	47	33	260	330	550	33	6	18.2%	15	480	800	1,000
2005	46	46	20	25	26	46	38	42	46	44	268	335	525	42	10	23.8%	21	448	800	950
2006	55	55	20	27	28	55	38	46	48	52	255	358	625	51	15	29.4%	26	480	800	1,000
2007	55	54	20	27	29	54	41	46	48	50	275	350	600	48	14	29.2%	20	440	800	1,000
2008	54	54	23	28	30	54	38	44	48	51	240	340	550	50	17	34.0%	21	350	700	950
2009	55	55	24	30	32	55	40	44	48	52	230	335	525	51	17	33.3%	19	225	800	1,000
2010	65	65	25	31	33	65	40	44	48	62	240	342	500	61	24	39.3%	27	400	800	1,040
2011	68	68	26	32	34	68	39	44	48	64	240	347	493	65	30	46.2%	26	500	750	1,000
2012	68	68	29	33	35	68	40	44	48	65	240	340	480	65	30	46.2%	28	450	710	1,000
2013	77	77	28	34	36	77	40	44	48	74	270	355	480	74	42	56.8%	34	400	710	1,040
2014	71	71	29	35	37	71	38	44	49	68	249	350	525	68	40	58.8%	31	400	690	1,000
2015	70	70	29	35	37	70	40	46	54	67	270	365	600	67	42	62.7%	30	500	806	1,090
2016	67	67	29	36	38	67	42	46	54	65	280	400	620	65	43	66.2%	30	500	819	1,197
2017	66	66	31	38	39	66	40	46	50	63	280	370	600	63	40	63.5%	29	500	800	1,000
2018*	6	6	31	34	41	6	47	48	48	5	400	480	1,000	6	5	83.3%	2	800	863	925
Total	325					312	36	42	48	304	200	300	425	291	92	31.6%	151	400	700	1,000

- Total includes every vessel used in this fishery from 1978 to 2018.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004. Average Earnings will not properly reflect estimated earnings by permit holder or vessel for these years.
- 2018 data is preliminary.



Table 1-10 provides additional Chignik salmon purse seine vessel characteristics. Included are statistics of engine propulsion and hull material for each year since 1978.

Table 1-10. Additional Chignik Salmon Purse Seine Vessel Characteristics

	Vessel	Engine Power					Hull Material								
Year	Count	Count	Diesel		Gas		Count	Aluminum		Fiberglass		Steel		Wood	
1978	95	91	90	98.9%	1	1.1%	92	2	2.2%	50	54.3%	0	0.0%	40	43.5%
1979	109	103	102	99.0%	1	1.0%	104	2	1.9%	64	61.5%	0	0.0%	38	36.5%
1980	103	95	95	100.0%	0	0.0%	95	2	2.1%	70	73.7%	0	0.0%	23	24.2%
1981	103	96	95	99.0%	1	1.0%	96	3	3.1%	77	80.2%	0	0.0%	16	16.7%
1982	103	99	99	100.0%	0	0.0%	98	2	2.0%	83	84.7%	0	0.0%	13	13.3%
1983	98	95	95	100.0%	0	0.0%	95	2	2.1%	81	85.3%	0	0.0%	12	12.6%
1984	102	101	99	98.0%	2	2.0%	101	2	2.0%	86	85.1%	0	0.0%	13	12.9%
1985	103	100	96	96.0%	4	4.0%	101	2	2.0%	87	86.1%	0	0.0%	12	11.9%
1986	104	101	95	94.1%	6	5.9%	103	2	1.9%	91	88.3%	0	0.0%	10	9.7%
1987	104	103	100	97.1%	3	2.9%	104	3	2.9%	92	88.5%	0	0.0%	9	8.7%
1988	109	107	104	97.2%	3	2.8%	108	3	2.8%	95	88.0%	0	0.0%	10	9.3%
1989	106	105	102	97.1%	3	2.9%	106	2	1.9%	96	90.6%	0	0.0%	8	7.5%
1990	101	101	100	99.0%	1	1.0%	101	1	1.0%	93	92.1%	1	1.0%	6	5.9%
1991	105	105	104	99.0%	1	1.0%	105	0	0.0%	98	93.3%	2	1.9%	5	4.8%
1992	102	102	101	99.0%	1	1.0%	102	0	0.0%	98	96.1%	2	2.0%	2	2.0%
1993	104	104	104	100.0%	0	0.0%	104	0	0.0%	100	96.2%	2	1.9%	2	1.9%
1994	101	101	100	99.0%	1	1.0%	101	1	1.0%	98	97.0%	1	1.0%	1	1.0%
1995	103	100	98	98.0%	2	2.0%	103	1	1.0%	99	96.1%	2	1.9%	1	1.0%
1996	102	98	97	99.0%	1	1.0%	102	1	1.0%	99	97.1%	1	1.0%	1	1.0%
1997	99	95	95	100.0%	0	0.0%	99	1	1.0%	95	96.0%	2	2.0%	1	1.0%
1998	85	81	81	100.0%	0	0.0%	85	0	0.0%	83	97.6%	1	1.2%	1	1.2%
1999	93	88	87	98.9%	1	1.1%	92	2	2.2%	88	95.7%	1	1.1%	1	1.1%
2000	100	96	96	100.0%	0	0.0%	100	1	1.0%	96	96.0%	3	3.0%	0	0.0%
2001	92	88	88	100.0%	0	0.0%	92	1	1.1%	88	95.7%	3	3.3%	0	0.0%
2002	42	41	41	100.0%	0	0.0%	42	1	2.4%	40	95.2%	1	2.4%	0	0.0%
2003	45	43	43	100.0%	0	0.0%	45	0	0.0%	44	97.8%	1	2.2%	0	0.0%
2004	34	34	34	100.0%	0	0.0%	34	0	0.0%	33	97.1%	1	2.9%	0	0.0%
2005	46	45	44	97.8%	1	2.2%	46	2	4.3%	44	95.7%	0	0.0%	0	0.0%
2006	55	53	53	100.0%	0	0.0%	55	1	1.8%	54	98.2%	0	0.0%	0	0.0%
2007	55	51	51	100.0%	0	0.0%	54	1	1.9%	53	98.1%	0	0.0%	0	0.0%
2008	54	52	50	96.2%	2	3.8%	54	1	1.9%	53	98.1%	0	0.0%	0	0.0%
2009	55	53	51	96.2%	2	3.8%	55	0	0.0%	54	98.2%	1	1.8%	0	0.0%
2010	65	63	61	96.8%	2	3.2%	65	0	0.0%	64	98.5%	1	1.5%	0	0.0%
2011	68	66	64	97.0%	2	3.0%	67	0	0.0%	63	94.0%	3	4.5%	1	1.5%
2012	68	66	65	98.5%	1	1.5%	68	0	0.0%	65	95.6%	2	2.9%	1	1.5%
2013	77	75	74	98.7%	1	1.3%	77	1	1.3%	72	93.5%	3	3.9%	1	1.3%
2014	71	69	68	98.6%	1	1.4%	71	1	1.4%	66	93.0%	4	5.6%	0	0.0%
2015	70	68	67	98.5%	1	1.5%	70	2	2.9%	63	90.0%	5	7.1%	0	0.0%
2016	67	66	65	98.5%	1	1.5%	67	1	1.5%	61	91.0%	5	7.5%	0	0.0%
2017	66	64	63	98.4%	1	1.6%	66	2	3.0%	61	92.4%	3	4.5%	0	0.0%
2018*	6	5	5	100.0%	0	0.0%	6	0	0.0%	6	100.0%	0	0.0%	0	0.0%
Total	325	308	286	92.9%	22	7.1%	312	14	4.5%	241	77.2%	12	3.8%	45	14.4%

- Total includes every vessel used in this fishery from 1978 to 2018.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004. Average Earnings will not properly reflect estimated earnings by permit holder or vessel for these years.
- 2018 data is preliminary.



Participation and Earnings

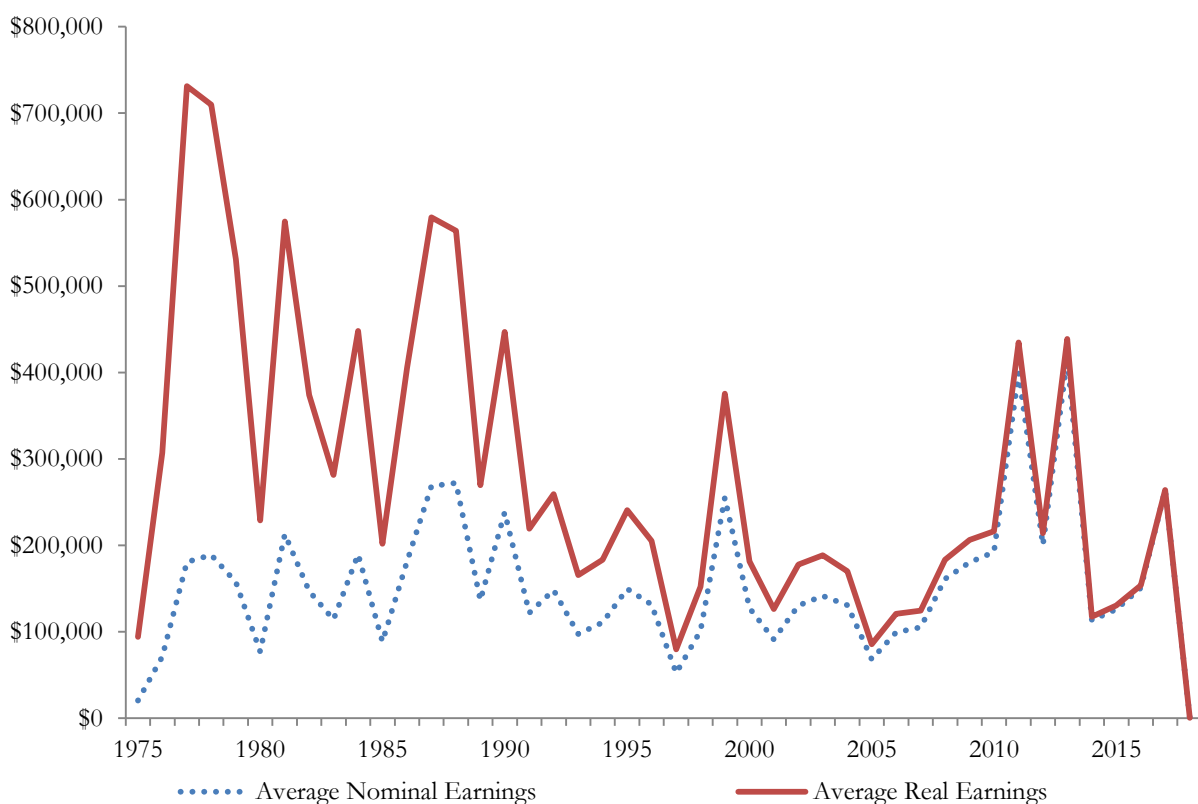
Earnings are estimated from weighted average ex-vessel prices, and as noted earlier, largely stem from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 1-4 are for both nominal and real dollars using the 2017 Consumer Price Index from the U.S. Bureau of Labor Statistics.

Permit counts include interim-entry permits and permanent permits. Interim-entry permits are issued to individuals during the period when their applications for permanent permits are in adjudication. The last year an interim-entry permit was held for the Chignik salmon purse seine fishery was in 2008. Some individuals made landings on both an interim-entry permit and subsequently on their newly issued permanent permit in the same year; for these instances, only the permanent permit is counted in this report.

Table 1-11 reports the number of permits issued, permits and vessels with landings, and estimated gross earnings in the Chignik salmon purse seine fishery from 1975 to 2018. Note that the figures by permit in this table span the entire year, regardless of who held the permit or however many times the permit was transferred.

Table 1-12 reports the number of permit holders (people) and estimated real (inflation-adjusted) gross earnings by each resident type.

Figure 1-4. Estimated Nominal and Real Average Gross Earnings Per Chignik Salmon Purse Seine Permit



- Real earnings are adjusted for inflation using the 2017 U.S. Bureau of Labor Statistics Consumer Price Index.



Table 1-11. Estimated Total Gross Earnings (Real and Nominal) for the Chignik Salmon Purse Seine Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2018

Year	Permits Issued	Total Gross Earnings Nominal	Total Gross Earnings Real	Permits With Landings	Average Real Earnings	Vessels With Landings	Average Real Vessel Earnings
1975	91	\$1,779,704	\$8,108,568	86	\$94,286	86	\$94,286
1976	91	\$5,486,251	\$23,634,268	77	\$306,939	78	\$303,003
1977	91	\$15,912,254	\$64,363,229	88	\$731,400	88	\$731,400
1978	95	\$17,562,986	\$66,028,208	93	\$709,981	95	\$695,034
1979	101	\$15,890,341	\$53,650,694	101	\$531,195	109	\$492,208
1980	101	\$7,778,332	\$23,138,650	101	\$229,096	103	\$224,647
1981	102	\$21,733,891	\$58,607,385	102	\$574,582	103	\$569,004
1982	102	\$14,867,916	\$37,766,046	101	\$373,921	103	\$366,661
1983	100	\$11,436,399	\$28,145,484	100	\$281,455	98	\$287,199
1984	100	\$18,989,185	\$44,799,124	100	\$447,991	102	\$439,207
1985	101	\$8,955,351	\$20,400,890	101	\$201,989	103	\$198,067
1986	100	\$18,139,377	\$40,568,651	100	\$405,687	104	\$390,083
1987	102	\$27,389,328	\$59,099,226	102	\$579,404	104	\$568,262
1988	101	\$27,492,891	\$56,965,827	101	\$564,018	109	\$522,622
1989	101	\$13,646,696	\$26,976,436	100	\$269,764	106	\$254,495
1990	101	\$24,062,162	\$45,127,139	101	\$446,803	101	\$446,803
1991	101	\$12,300,704	\$22,137,655	101	\$219,185	105	\$210,835
1992	101	\$14,988,314	\$26,186,283	101	\$259,270	102	\$256,728
1993	102	\$9,952,323	\$16,882,446	102	\$165,514	104	\$162,331
1994	100	\$10,980,605	\$18,161,713	99	\$183,452	101	\$179,819
1995	100	\$14,961,281	\$24,063,709	100	\$240,637	103	\$233,628
1996	101	\$13,150,294	\$20,544,295	100	\$205,443	102	\$201,415
1997	100	\$5,125,222	\$7,827,379	98	\$79,871	99	\$79,064
1998	100	\$8,617,756	\$12,959,414	85	\$152,464	85	\$152,464
1999	99	\$22,966,602	\$33,790,958	90	\$375,455	93	\$363,344
2000	99	\$12,629,695	\$17,977,879	99	\$181,595	100	\$179,779
2001	98	\$8,411,090	\$11,641,595	92	\$126,539	92	\$126,539
2002	100	\$5,348,911	\$7,288,078	41	\$177,758	42	\$173,526
2003	101	\$6,088,452	\$8,110,877	43	\$188,625	45	\$180,242
2004	100	\$4,191,186	\$5,438,558	32	\$169,955	34	\$159,958
2005	99	\$6,627,770	\$8,318,479	97	\$85,758	46	\$180,836
2006	96	\$4,764,730	\$5,793,306	48	\$120,694	55	\$105,333
2007	92	\$5,798,496	\$6,854,990	55	\$124,636	55	\$124,636
2008	92	\$8,702,917	\$9,908,172	54	\$183,485	54	\$183,485
2009	91	\$9,930,644	\$11,346,292	55	\$206,296	55	\$206,296
2010	91	\$12,509,651	\$14,062,285	65	\$216,343	65	\$216,343
2011	91	\$25,542,055	\$27,833,628	64	\$434,900	68	\$409,318
2012	91	\$13,842,993	\$14,779,108	69	\$214,190	68	\$217,340
2013	91	\$31,698,894	\$33,353,937	76	\$438,868	77	\$433,168
2014	91	\$7,935,605	\$8,216,644	70	\$117,381	71	\$115,727
2015	91	\$8,955,851	\$9,262,028	71	\$130,451	70	\$132,315
2016	91	\$10,403,040	\$10,624,662	69	\$153,981	67	\$158,577
2017	91	\$17,685,960	\$17,685,960	67	\$263,970	66	\$267,969
2018*	90	\$3,983	\$3,889	6	\$648	6	\$648

- Adjusted for inflation to 2017 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004. Average Earnings will not properly reflect estimated earnings by permit holder or vessel for these years.
- 2018 data is preliminary.



Table 1-12. Estimated Real Gross Earnings for Permit Holders in the Chignik Salmon Purse Seine Fishery by Resident Type, 1975-2018

Year	Local Gross Earnings			Nonlocal Gross Earnings			Nonresident Gross Earnings			Total Gross Earnings		
	People	Average	Total	People	Average	Total	People	Average	Total	People	Average	Total
1975	30	\$108,424	\$3,252,709	37	\$85,063	\$3,147,338	19	\$89,922	\$1,708,522	86	\$94,286	\$8,108,568
1976	31	\$290,773	\$9,013,976	33	\$313,873	\$10,357,794	15	\$284,167	\$4,262,498	79	\$299,168	\$23,634,268
1977	33	\$714,158	\$23,567,218	40	\$735,390	\$29,415,609	17	\$669,435	\$11,380,402	90	\$715,147	\$64,363,229
1978	38	\$637,375	\$24,220,265	43	\$759,274	\$32,648,763	13	\$704,552	\$9,159,180	94	\$702,428	\$66,028,208
1979	38	\$447,136	\$16,991,168	49	\$584,855	\$28,657,882	14	\$571,546	\$8,001,643	101	\$531,195	\$53,650,694
1980	43	\$199,525	\$8,579,586	45	\$253,421	\$11,403,956	14	\$225,365	\$3,155,108	102	\$226,850	\$23,138,650
1981	47	\$495,749	\$23,300,187	40	\$663,946	\$26,557,824	18	\$486,076	\$8,749,374	105	\$558,166	\$58,607,385
1982	46	\$358,334	\$16,483,351	41	\$396,882	\$16,272,181	16	\$313,157	\$5,010,514	103	\$366,661	\$37,766,046
1983	49	\$249,192	\$12,210,415	40	\$299,818	\$11,992,738	16	\$246,396	\$3,942,332	105	\$268,052	\$28,145,484
1984	53	\$385,160	\$20,413,464	36	\$480,400	\$17,294,416	15	\$472,750	\$7,091,244	104	\$430,761	\$44,799,124
1985	56	\$208,461	\$11,673,843	40	\$173,035	\$6,921,395	14	\$128,975	\$1,805,652	110	\$185,463	\$20,400,890
1986	60	\$371,508	\$22,290,462	34	\$415,321	\$14,120,904	13	\$319,791	\$4,157,285	107	\$379,146	\$40,568,651
1987	57	\$544,902	\$31,059,409	37	\$570,266	\$21,099,859	14	\$495,711	\$6,939,958	108	\$547,215	\$59,099,226
1988	52	\$504,116	\$26,214,054	36	\$595,730	\$21,446,275	15	\$620,367	\$9,305,498	103	\$553,066	\$56,965,827
1989	52	\$308,160	\$16,024,308	36	\$235,233	\$8,468,373	17	\$146,103	\$2,483,755	105	\$256,918	\$26,976,436
1990	49	\$406,580	\$19,922,424	41	\$428,412	\$17,564,884	17	\$449,402	\$7,639,831	107	\$421,749	\$45,127,139
1991	48	\$204,864	\$9,833,493	36	\$198,882	\$7,159,765	21	\$244,971	\$5,144,397	105	\$210,835	\$22,137,655
1992	54	\$218,317	\$11,789,135	39	\$221,021	\$8,619,812	20	\$288,867	\$5,777,336	113	\$231,737	\$26,186,283
1993	47	\$148,976	\$7,001,872	38	\$151,176	\$5,744,701	19	\$217,678	\$4,135,873	104	\$162,331	\$16,882,446
1994	53	\$159,357	\$8,445,924	33	\$164,021	\$5,412,699	19	\$226,478	\$4,303,090	105	\$172,969	\$18,161,713
1995	49	\$233,040	\$11,418,971	36	\$214,997	\$7,739,904	21	\$233,563	\$4,904,833	106	\$227,016	\$24,063,709
1996	51	\$178,694	\$9,113,377	34	\$201,612	\$6,854,810	18	\$254,228	\$4,576,108	103	\$199,459	\$20,544,295
1997	51	\$71,291	\$3,635,848	33	\$83,902	\$2,768,768	15	\$94,851	\$1,422,764	99	\$79,064	\$7,827,379
1998	48	\$135,319	\$6,495,293	25	\$159,562	\$3,989,045	12	\$206,256	\$2,475,076	85	\$152,464	\$12,959,414
1999	47	\$382,389	\$17,972,262	33	\$365,735	\$12,069,256	10	\$374,944	\$3,749,440	90	\$375,455	\$33,790,958
2000	47	\$181,518	\$8,531,323	42	\$167,033	\$7,015,373	13	\$187,014	\$2,431,182	102	\$176,254	\$17,977,879
2001	51	\$120,225	\$6,131,481	33	\$111,183	\$3,669,053	12	\$153,422	\$1,841,061	96	\$121,267	\$11,641,595
2002	29	\$143,421	\$4,159,213	confidential	confidential	confidential	1 to 3	confidential	confidential	42	\$173,526	\$7,288,078
2003	31	\$158,190	\$4,903,902	9	\$288,113	\$2,593,017	4	\$153,490	\$613,958	44	\$184,338	\$8,110,877
2004	25	\$148,379	\$3,709,483	confidential	confidential	confidential	1 to 3	confidential	confidential	32	\$169,955	\$5,438,558
2005	44	\$105,300	\$4,633,183	39	\$70,952	\$2,767,144	14	\$65,582	\$918,152	97	\$85,758	\$8,318,479
2006	29	\$126,791	\$3,676,948	13	\$103,472	\$1,345,140	6	\$128,536	\$771,218	48	\$120,694	\$5,793,306
2007	31	\$135,117	\$4,188,612	15	\$97,513	\$1,462,701	9	\$133,742	\$1,203,677	55	\$124,636	\$6,854,990
2008	35	\$164,772	\$5,767,028	15	\$162,905	\$2,443,577	6	\$282,928	\$1,697,567	56	\$176,932	\$9,908,172
2009	38	\$194,451	\$7,389,142	14	\$172,540	\$2,415,554	6	\$256,933	\$1,541,596	58	\$195,626	\$11,346,292
2010	34	\$189,397	\$6,439,492	25	\$203,192	\$5,079,793	9	\$282,556	\$2,543,001	68	\$206,798	\$14,062,285
2011	37	\$427,997	\$15,835,891	22	\$353,460	\$7,776,128	8	\$527,701	\$4,221,609	67	\$415,427	\$27,833,628
2012	38	\$210,963	\$8,016,610	24	\$218,747	\$5,249,917	7	\$216,083	\$1,512,580	69	\$214,190	\$14,779,108
2013	37	\$440,828	\$16,310,628	30	\$432,183	\$12,965,479	11	\$370,712	\$4,077,830	78	\$427,615	\$33,353,937
2014	34	\$117,218	\$3,985,397	25	\$90,817	\$2,270,426	11	\$178,256	\$1,960,821	70	\$117,381	\$8,216,644
2015	34	\$126,012	\$4,284,402	28	\$120,141	\$3,363,939	10	\$161,369	\$1,613,688	72	\$128,639	\$9,262,028
2016	35	\$156,380	\$5,473,289	24	\$158,538	\$3,804,905	10	\$134,647	\$1,346,468	69	\$153,981	\$10,624,662
2017	36	\$250,861	\$9,030,978	23	\$255,314	\$5,872,225	9	\$309,195	\$2,782,757	68	\$260,088	\$17,685,960
2018*	confidential	confidential	confidential	1 to 3	confidential	confidential	0	\$0	\$0	6	\$648	\$3,889

- Adjusted for inflation to 2017 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year. Note that these counts are for individuals, not permits.
- From 2002 – 2005 the majority of S01L permit holders participated in a salmon cooperative. Some S01L permit holders benefited from the cooperative without using their permit from 2002 – 2004. Average Earnings will not properly reflect estimated earnings by permit holder or vessel for these years.
- 2018 data is preliminary.



December 22, 2019

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

Re: Opposition to Proposals 73, 74, 75, 77

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and live here year-round with my wife.

I oppose these proposals (73, 74, 75, and 77) because they are counterproductive to the stated intent and I support the current management plan as written.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



December 27, 2019

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Charles "Chuck" McCallum
601 N Bragaw Street
Anchorage, AK 99508

Subject: CFEC Report for Chignik

Dear Alaska Board of Fisheries,

Chignik seine permit values are higher than Kodiak seine permit values and frequently people make the mistake of assuming that means that Chignik's fishery earnings must be higher than Kodiak's, but this is simply not so. In fact Kodiak's earnings are higher than Chignik's and still, Chignik's permit values are higher. Attached is a report from University of Alaska professor Dr. Gunnar Knapp, which was submitted at the 2017 Kodiak Board of Fisheries meeting, that discusses this.

In brief the report says that simple economic theory would hold that "if permit buyers are willing to pay more for a Fishery A permit than for a Fishery B permit, they presumably expect that they are likely to earn higher profits in Fishery A than in Fishery B; but that since "average earnings per permit fished have in recent years more often than not been higher in the Kodiak fishery than in the Chignik fishery, it seems hard to conclude that higher permit prices in the Chignik fishery necessarily imply that it is more profitable for active participants than the Kodiak fishery."

Simple economic theory assumes buyers have perfect knowledge of the market (supply and demand) and business operating conditions and we might speculate that the lack of perfect knowledge of the Chignik fishery may explain, at least in part, why Chignik permit prices defy simple economic theory. In any case understanding the 'why' is really beside the primary point which is that it would be illogical to conclude that because Chignik permit values are higher than Kodiak's that that is any kind of valid evidence that Chignik's fisheries are in good shape. Chignik is in bad shape compared to Kodiak and needs the board's help in ensuring that more Chignik bound sockeye are available for harvest by Chignik fishermen.

Sincerely,

Chuck McCallum



January 7, 2017

To: Chuck McCallum

From: Gunnar Knapp
Professor Emeritus of Economics
University of Alaska Anchorage Institute of Social and Economic Research (ISER)

A handwritten signature in black ink that reads "Gunnar Knapp".

This memo responds to your request for my professional opinion about whether differences in permit values between fisheries necessarily reflect differences in the potential earnings in those fisheries, and in particular whether differences in permit values between the Chignik and Kodiak salmon purse seine fisheries necessarily reflect differences in the potential earnings of permit holders in these two fisheries.

Please note that in responding to your request I am not intending to comment in any way on any policy issue which may be before the Board of Fisheries. I have not followed whatever issues the Board may be considering with respect to these fisheries and I have no opinion on them. So I'm only addressing the specific question you raised related to what relative permit valuations can tell us about relative earnings potential between two fisheries.

My background

By way of background, I retired at the end of June 2016 from the University of Alaska Anchorage Institute of Social and Economic Research (ISER). I spent most of my 35-year career at ISER studying economic issues related to salmon markets and salmon management, including factors affecting salmon fishery earnings and permit prices.

Upon my retirement, I was designated a "professor emeritus," which is basically an honorary distinction under which I retain an affiliation with ISER. I am doing a small amount of work for ISER under one contract related to economic impacts of southeast Alaska salmon fisheries, but am otherwise not receiving any pay from ISER or any other organization. However, I continue to maintain my professional interest in Alaska salmon markets and management.

The simple answer suggested by economic theory

Simple economic theory suggests that what a potential permit buyer would be willing to pay for a permit in a given fishery reflects the buyer's estimate of the present discounted value (e.g. value as of the present time) of the profits that he will be able to earn from the fishery in the future. Under this reasoning, if permit buyers are willing to pay more for a Fishery A permit than for a Fishery B permit, they presumably expect that they are likely to earn higher profits in Fishery A than in Fishery B.



What do the data show?

It's always a good idea to check whether available data support the logic of an economic theory. To do this with regard to the Chignik and Kodiak purse seine fisheries, I prepared the attached table comparing selected data for these fisheries for the most recent ten-year period for which data are available (2006-2010).

Selected data for the Kodiak (S01K) and Chignik (S01L) salmon purse seine fisheries

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Average permit price										
S01K	18,000	21,300	24,200	26,000	27,700	44,000	41,700	40,600	50,600	40,000
S01L	146,500	131,500	91,300	70,800	78,400	95,100	97,600	186,300	211,300	227,500
Ratio	0.12	0.16	0.27	0.37	0.35	0.46	0.43	0.22	0.24	0.18
Average earnings per permit fished										
S01K	191,505	173,984	166,749	190,795	129,137	250,596	244,927	333,048	190,573	173,209
S01L	99,265	105,427	161,165	180,557	192,456	399,095	200,623	417,091	113,366	126,138
Ratio	1.93	1.65	1.03	1.06	0.67	0.63	1.22	0.80	1.68	1.37
Average earnings, first quartile										
S01K	439,948	358,674	414,490	457,321	313,852	724,935	622,489	745,762	545,807	496,199
S01L	210,370	249,968	299,956	319,366	358,095	812,550	360,357	675,786	294,362	250,913
Ratio	2.09	1.43	1.38	1.43	0.88	0.89	1.73	1.10	1.85	1.98
Average earnings, second quartile										
S01K	289,271	255,152	250,238	305,184	224,280	453,987	409,765	502,911	328,654	305,384
S01L	141,970	178,648	238,946	257,793	268,280	615,590	279,354	544,693	194,716	195,995
Ratio	2.04	1.43	1.05	1.18	0.84	0.74	1.47	0.92	1.69	1.56
Average earnings, third quartile										
S01K	209,084	201,936	174,398	201,519	142,600	279,367	268,385	343,247	222,088	186,259
S01L	102,964	111,628	171,077	193,786	197,164	441,737	205,385	451,909	124,453	130,067
Ratio	2.03	1.81	1.02	1.04	0.72	0.63	1.31	0.76	1.78	1.43
Average earnings, fourth quartile										
S01K	97,062	88,096	84,034	95,594	60,991	113,944	117,877	172,473	86,250	80,217
S01L	53,659	50,655	89,149	101,455	109,693	201,926	113,188	244,669	52,342	66,680
Ratio	1.81	1.74	0.94	0.94	0.56	0.56	1.04	0.70	1.65	1.20
Total permanent permits renewed										
S01K	375	377	374	374	375	376	376	376	373	372
S01L	91	91	91	91	91	91	91	91	91	91
Ratio	4.12	4.14	4.11	4.11	4.12	4.13	4.13	4.13	4.10	4.09
Total permits issued/renewed										
S01K	375	377	374	374	375	376	376	376	373	372
S01L	96	92	92	91	91	91	91	91	91	91
Total permits fished										
S01K	130	140	128	157	154	174	166	167	184	180
S01L	48	55	54	55	65	64	69	76	70	71
Share of permits fished										
S01K	35%	37%	34%	42%	41%	46%	44%	44%	49%	48%
S01L	50%	60%	59%	60%	71%	70%	76%	84%	77%	78%

Data Sources: CFEC Basic Information Tables and Quartile tables



Clearly, during this period, Kodiak permit prices were much lower than Chignik permit prices, with the price of a Kodiak permit ranging from as low as 12% of the price of a Chignik permit (in 2006) to as high as 46% (in 2011).

However, average earnings per permit fished between these fisheries did not show the same disparity. Average earnings per permit fished were higher in the Kodiak fishery than for the Chignik fishery in seven of the ten years. In general, this was the case for all quartile groups: for all quartile groups, in most years, average earnings were higher in the Kodiak fishery than for the Chignik fishery.

Thus, whatever economic theory based on permit prices might seem to suggest, it seems hard to conclude that those permit holders who actually participated in the Chignik fishery were somehow doing far better economically than those who participated in the Kodiak fishery.

It should be noted that the theory of permit prices is based on expected future profits, which are of course not the same as earnings, but depend also on costs. Thus two fisheries might have similar earnings but one might have higher profits if it has lower costs. I'm not aware of any particular reason why there would be a huge difference in costs between these two fisheries, although differences in the geography of where people fish and the mix of species they fish for might affect the share of costs in total earnings and thus profits.

I am struck by the significant differences between these two fisheries in the share of permits fished (and its converse, the share on non-fished or latent permits). Clearly a much higher share of permits are fished in the Chignik fishery than in the Kodiak fishery. Put differently, there is a much higher share of unfished or latent permits in the Kodiak fishery than in the Chignik fishery.

I would hypothesize that this difference in the share of permits fished may reflect an important difference between the two fisheries which *may* help to explain the difference in permit prices. Clearly the number of permits in the Chignik fishery is closer to "optimal" for current run and market conditions than it is in the Kodiak fishery. The large number of latent permits may tend to hold down permit prices in Kodiak because a larger number of are likely to be available for sale at any given time. Perhaps more importantly, there is less potential for upside gain in a permit holder's earnings in the Kodiak fishery should future prices and runs strengthen, because there is more potential for effort in the fishery to increase, spreading the available harvest among more permits.

Conclusion

I have not studied these fisheries in detail and I am not able to give a definitive explanation of the relative differences in permit prices in the Kodiak and Chignik fisheries. But given the fact that average earnings per permit fished have in recent years more often than not been higher in the Kodiak fishery than in the Chignik fishery, it seems hard to conclude that higher permit prices in the Chignik fishery necessarily imply that it is more profitable for active participants than the Kodiak fishery.



Office of the Mayor and City Council

710 Mill Bay Road, Room 220, Kodiak, Alaska 99615

December 12, 2019

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

Emailed to:
dfg.bof.comments@alaska.gov

Submitted via Online Comments

Dear Chairman Morisky:

The City of Kodiak looks forward to hosting the Alaska Board of Fisheries here in Kodiak for your January 11-14 Kodiak finfish meeting.

Kodiak is a commercial fishing town. We exist as a community because of our fisheries and our economy continues to be based, in large part, on commercial and recreational fishing. Especially important to Kodiak is the salmon fleet's enormous economic contribution which often provides more than \$40,000,000 per year to our community. The massive fishery management changes advocated by proposals 58-64 regarding the Cape Igvak Management Plan and proposals 65, 66 and 37 regarding changes to Kodiak sockeye management could reduce annual Kodiak salmon revenues by more than 1/3. Approving any one or more of these proposals will cause significant economic harm as well as social and cultural upheaval to Kodiak's harvesters, processors, processing workers, businesses, schools, villages and the entire community.

Consequently, The City of Kodiak strongly opposes Alaska Board of Fisheries Approval of proposals 58, 59, 60, 61, 62, 63, 64, 65, 66, and 37!

The Cape Igvak Management Plan has been in place since 1977. The 1977 Alaska Board of Fisheries struck a compromise between Kodiak fishermen that had fished in the area for many years and Chignik fishermen that were focused on catching local stocks by mostly fishing in Chignik lagoon. Unlike many fishery allocations plans that award a strict percentage of the run to competing users, the Cape Igvak management plan specifically guarantees Chignik fishermen a set amount of catch before Kodiak fishermen can fish at Cape Igvak. The plan further limits Kodiak fishermen to a percentage of the overall Chignik run.



Consequently, the structure of the Cape Igvak management plan ensures resource conservation in years of low abundance (2018 & 19) by altogether prohibiting Kodiak fishermen from fishing at Cape Igvak. In years of greater abundance, Chignik fishermen are awarded a minimum of 300,000 sockeye or approximately 2.5 million dollars in value (@\$35,000 per active vessel) before Kodiak fishermen can fish Cape Igvak. The economic and conservation safety net for Chignik illustrates that the Cape Igvak management plan was not based on some respective strength of the sockeye runs the two areas. If it were, the plan would have tracked the minimum Chignik guarantee to an assessment of the strength of the Chignik run. In summary the Cape Igvak Management Plan already balances economic equities between Kodiak and Chignik and establishes a shared conservation burden.

United Cook Inlet Drift Association's (UCIDA) proposals, 65 and 66, would make wholesale and unwarranted changes to Kodiak's salmon harvests in multiple areas around Kodiak, setting caps to limit sockeye harvests by week and by area in addition to area closures. Their proposed "harvest caps" are unsupported by harvest data or biology. In addition the caps focused exclusively on sockeye salmon would disrupt a carefully balanced Kodiak management system for pink, chum, and coho salmon.

The Kodiak salmon fishery has existed for 135 years, since 1882. Kodiak's salmon harvesting sector is made up of seine and set gillnet participants—many of which are native Alaskan or 3 and 4th generation fishermen. The Kodiak season lasts for almost four months and changes focus from early run sockeye to pinks and chums and then to coho as they arrive with a transition to late run sockeye. Management of the fishery is focused on all species of local stocks with an emphasis on early encounter by allowing fishing on the capes and capture of high-quality Kodiak salmon for maximum market value.

Recent genetic information has provided more detail regarding the randomness and unpredictability of Cook Inlet sockeye in the Kodiak area but it does not show consistent catches of Cook Inlet origin sockeye in any one area or time frame. Moreover, the genetic study confirmed that Kodiak's catches of Cook Inlet stocks are not above estimates made by the Alaska Department of Fish and Game in the early 1990's. Large area closures and the "caps" proposed in proposals 65 and 66 will lower fish quality, force derby style fisheries in "near river" areas and reallocate between seine fishermen and set-net fishermen based on a low probability that Cook Inlet stocks would be in a specific section of the Kodiak management area during a specific time frame.

The City of Kodiak encourages the Board to carefully apply your Mixed Stock Fisheries Policy as well as your Allocation Criteria to the aforementioned proposals. As the Mixed Stock Fisheries Policy states regarding the Cape Igvak Management plan. "Most mixed stock fisheries are long standing and have been scrutinized many times by past Boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation."

The Board's 7 Allocation Criteria also tip in favor of maintaining the status quo. Kodiak's commercial salmon harvests are well established without any new or expanding fisheries. The



management plans for Kodiak's salmon fishery have remained essentially unchanged for almost 30 years – back to when Kodiak's "conservation corridor" was established by the N. Shelikof management plan. Kodiak enjoys a large resident salmon fishing fleet and the salmon fleet accounts, in most years, for more than 1/3 of Kodiak's overall fishing income.

As representatives of the City of Kodiak we often face proposals and advocates wanting CHANGE to a particular City program, project of policy. Sometimes change is needed and justified by the facts and circumstances. However, we've also experienced that when a program or policy is long established and working well, change can have unintended consequences and cause unnecessary harm. We believe this is the situation the Alaska Board of Fisheries faces with regard to proposals 58-66 & 37. Change to Kodiak's salmon management plans is not justified by the facts and circumstances surrounding the issues and it will result in unintended consequences and unnecessary harm. Therefore, STATUS QUO, is the decision the Board should make.

If you have any questions regarding the City of Kodiak's strong opposition to proposals 58-66 and proposal 37 please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, reading "Pat Branson", is positioned above the printed name.

Pat Branson, Mayor



5642 40th Ave. W.
Seattle, WA 98199

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

Dear A.D.F.&G. Board Members:

I've been a setnetter in Uyak Bay, the Northwest Section of the Central Kodiak District, since 1971. My experience and observation during this time have given me confidence that the management decisions of the A.D.F.&G. have protected and sustained this amazing resource. Of course, when these decisions have a negative impact on my local area, I will always speak up in unity with my fellow fishermen. I rely on the judgement, hard work and research of the Kodiak Salmon Work Group and the Northwest Setnetters Association to guide me in advocating for their support for the following proposals at the upcoming Board meetings in Kodiak:

Proposal # 67 5AAC 18:331
Proposal # 70 5 AAC 18:362
Proposal # 71 5 AAC 18:362

I urge you to oppose the following proposals:

#37
#58
#59
#60
#61
#62
#63
#64
#65
#66

Sincerely,

Daniel Earle



December 22, 2019

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

Re: Opposition to Proposals 73, 74, 75, and 77

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

I oppose these proposals (73, 74, 75, and 77) because they are counterproductive to the stated intent and I support the current management plan as written.

I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes to the salmon management plans in the Kodiak Management Area, which would create ripple effects negatively impacting Kodiak fishermen, processing workers, and community businesses. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly request the Board to reject these proposals.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



Danny Campbell
Box 22
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Oppose Proposals 58,59,60,61,62,63,64,37.65.66

Board Members:

I'm a salmon fisherman living in Ouzinkie. Salmon fishing is my primary income. I depend on having an opportunity to fish all over the island and on the mainland. During a long Kodiak salmon season, it's important for me and my skipper to have lots of options. If you would close down Cape Igvak or the mainland or some of the capes on Kodiak, that would directly impact me and my fishing earnings. As more boats stack up in smaller spaces, it doesn't make it worthwhile for anyone. Kodiak is more of a grinding fishery, not just a big hit or a big day here or there. That's why the types of closures recommended in proposals 58,59,60,61,62,63,64,65,66 and 37 would be so bad for me and the fishermen from Ouzinkie.

For thousands of years nonlocal sockeye salmon have been passing through what is today the Kodiak management area. And Kodiak bound salmon are undoubtedly harvested within other management areas and always have been. Kodiak salmon fisheries are well-known to be mixed stock fisheries, with an unpredictable component of nonlocal salmon.

There is no indication that 135 years of commercial salmon fishing around Ouzinkie and in Kodiak's waters ever posed any threat to Cook Inlet stocks. Under conditions when conservation of Cook Inlet's sockeye returns would be a concern, it is not likely that much bycatch. You can't catch what isn't there. I understand that the Department looked at this for several years in the 1990's and concluded that the presence of Cook Inlet sockeye in the Kodiak area is directly related to the strength of the Cook Inlet run.

If the Yentna River in upper Cook Inlet has a stock of yield concern that requires regulatory action, you can't start by imposing restrictions 400 miles away in Kodiak. You have to start management restrictions in the nearest and biggest intercept fisheries, not the furthest and smallest. Kodiak salmon fisheries are already managed according to a well-documented series of successful management plans, none of which need to be amended now to account for harvests that fluctuate on the basis of natural abundance and pose no threat to conservation.

Thank you for your time and your service.



Thank You

Danny Campbell

Danny Campbell

Danny Clarion
Box P.O. Box 71
Ouzinkie, AK 99644



PC521
1 of 1

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Reject Proposals 58,59,60,61,62,63,64,65,66 and 37

Board Members:

I've been a fishermen and resident of Ouzinkie for most of my life. Salmon fishing is very important to Ouzinkie. We've worked hard to have a good boat harbor and city dock to support our salmon fleet. Everyone in Ouzinkie knows that Cook Inlet fish sometimes pass through our area. On the back of Spruce Island, they occasionally just show up and then they are gone. No one knows when they will appear and most years, we don't see any of the bigger fish. That's why I don't think the Board should make any changes to salmon fishing in Kodiak because of Cook Inlet fish. They're not here every year and they are not in the same spot when they do hit. More closures just hurt Kodiak without any known benefit to Cook Inlet.

When I look at the make-up of this current Board of Fisheries, I feel a little uneasy. I see three members with very little commercial fishing experience with four members who live in upper Cook Inlet, plus one in Fairbanks. I only see one member with Kodiak area knowledge and another with some blue water commercial fishing experience. I think it may take some experience on the water to understand the Kodiak fishery. It's a long fishery with a number of variables happening all at once. Several salmon species from hundreds of systems return over about four months. Fishermen are moving constantly. That's why the Cape Igvak fishery is so important. There is occasionally a "big hit" but more often our season is a day to day grind. We don't fish like Cook Inlet or Chignik close to a primary terminal area. I hope you will listen to your fellow board members that have commercial fishing experience to Understand Kodiak's "mixed stocks" fishery. As you travel around the state you will find that mixed stock fisheries are the rule rather than the exception.

I strongly urge you to look at the long-term stability of the Kodiak fishery, and to rely on the Board's statutory allocation criteria when making allocative decisions, especially involving salmon. Dozens and dozens of past board members have done just that, and what exists in regulation now is an evolved balance that recognizes the history and economic importance of both Kodiak and Cook Inlet. Since 1989, all salmon management decisions in the Kodiak area have been based on local Kodiak stocks. Targeted interceptions that occurred before 1989 have long ago been stopped. Local pink and chum salmon are harvested all around the Kodiak and Afognak Island complex. Whatever interception of Cook Inlet salmon that still occurs is minimal, sporadic, and generally not measurable in-season.

Sincerely yours

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

Danny Clarion



December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Opposition to Proposals 58-61

The members of the Alaska Board of Fisheries,

I'm writing in **opposition to proposals 58-61**, which are designed to re-allocate harvest away from Kodiak fishermen to Chignik area fishermen. I'm a Kodiak resident and am now 10 years into my career as the owner/operator of a 42-foot fishing vessel that I operate exclusively in the Kodiak area. I find the proposals concerning the Cape Igvak area to be particularly personal and impactful because this area has been indispensable to my survival as a commercial fisherman. There have been multiple years during which my effort at Cape Igvak defined my profit for the season.

Our fleet is already at a breaking point, as disastrous even year salmon runs, declining markets, drought plagued streams, and the collapse of the cod and herring fishery has left our fishermen in fear of the future. The last thing that we need is for the board to overturn a longstanding fishery that we have relied on and built our businesses around. The problems facing the Chignik community are not unique to them, but are instead indicative of a regionwide struggle. Kodiak's communities have *not* been spared from the same economic declines.

While Kodiak is often the focus of attention when it comes to mixed stock fisheries, our southern neighbors in Chignik have somehow evaded any consideration for the non-local portion of their harvest, despite the publication of the WASSIP study and the clear recent expansion of their fishery into fully allocated, mixed, non-local stocks. It has been frustrating as a Kodiak fisherman to speak to honest Chignik fishermen who have told us what we already knew – that they are catching our fish in abundance and without limitations. Stories of Chignik fishermen harvesting deckloads of late-Karluk sockeye (the most easily identifiable salmon in the gulf) are commonly told by the fishermen who caught them, yet, even in 2016, when we had our disastrous year, Chignik fishermen operated without any limitations designed to protect our fleet and our local stocks. This is a glaring inequity in how the two regions are managed, and if any changes need to be made then those changes should occur in the Chignik area where they should also be held accountable for the harvest of Kodiak fish.



It is my hope that this board will fairly adjudicate this long-standing dispute just as other boards have done in the past by strictly applying the allocation criteria and considering the historical and economic importance of the Igvak fishery to Kodiak's fleet. If the board were to accept any of these proposals then they should be aware and open about the fact that they are choosing to lower annual harvests, which will necessarily put some Kodiak fishermen out of business. Such a decision would need a clear justification. The board will not be able to fix the problems of our coastal communities by stealing from one area to provide for another, especially when fishermen in both areas are struggling simply to maintain their livelihoods.

Thank you,
Darren Platt



December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: **Opposition to Proposals 63 and 37**

The members of the Alaska Board of Fisheries,

I'm writing in **Opposition to Proposals 63 and 37**. The conservation of King salmon is one of the most important fisheries issues facing the state and I believe that we should continue the non-retention program in Kodiak until stocks have rebounded. However, the genetic reports on recreational, seine and trawl-caught Chinook in the Kodiak area all concluded that there are minimal Cook Inlet Kings in the western Gulf. How can we adopt conservation measures in Kodiak to save fish that we aren't catching in the first place? This is clearly another case where Kodiak fishermen are receiving undue blame for problems occurring elsewhere in the state. Conservation plans are most effective near the natal streams of the concerned stocks and restrictions should focus where they would provide the most benefit with the least unintended harm.

Thank you,
Darren Platt



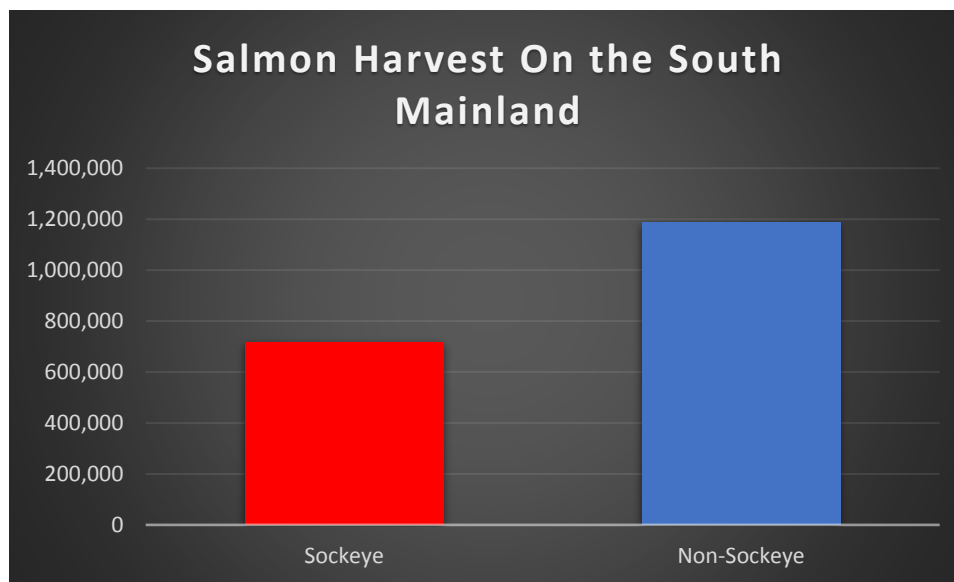
December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: **Oppose Proposals 64 and 65**

The members of the Alaska Board of Fisheries,

I'm writing in **Opposition to Proposals 64 and 65**. These proposals are designed to close down a long-standing fishery with the misguided intention of preventing the harvest of Cook Inlet bound sockeye. These proposals neglect the fact that the majority of fish harvested in this area during the four 57-hour July openings are local pink and chum salmon. I put a graph below that shows cumulative harvest in this section from 2008 to 2018.



Clearly the greatest impact of the proposal would be to inhibit the harvest of local stocks in addition to disrupting an established fishery. We already have extremely limited fishing opportunities in this area, since the Katmai Bay and Alinchak sections are only allowed four 57-hour openers before August 1st, and the Igvak section, when it actually opens, is managed with fixed harvest allocation which inherently acts to protect Cook Inlet stocks, as well.



There is no scientific or genetic data to suggest that Cook Inlet sockeye are the primary stocks harvested here. No genetic stock assessment was performed in Katmai Bay and Alinchak sections and the data from Igvak is too sparse and inconsistent to draw conclusions about predictable migration paths. The North Shelikof Straight Management plan already imposes an unusual conservation burden on Kodiak fishermen simply to protect Cook Inlet Sockeye which are regularly over-escaped in the Kenai river.

The Board should also consider the current lack of consistency in management policies. Kodiak fishermen are help accountable for non-local harvest at Cape Igvak and the North Shelikof Straight, yet no other areas have management protections designed to inhibit the non-local harvest of Kodiak stocks.

The entire reason why the board adopted a mixed stock policy was because it is readily clear that proposals like this one would cause net harm to Alaska and its fishing communities.

I'm the owner and captain of a small seiner in Kodiak and these proposals would directly negatively impact me, my crew and my business.

Thank you,
Darren Platt



December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: **Opposition Proposals 69-79**

The members of the Alaska Board of Fisheries,

I'm writing in **opposition to proposals 69 and 70**, which would allow fishery managers to open the central section for the directed harvest of Karluk pink salmon even if the local streams in the Northwest district are experiencing poor escapement. It is dangerous to assume that Karluk is consistently the primary source of pink salmon production on the West Side of Kodiak and approval of this proposal will lead to the deterioration of even-year pink runs in the Northwest Kodiak district. Although on some years, such as 2018 Karluk produced abundant pink returns in comparison systems in the Northwest district, this has not always been the case. In 2006, one of the highest historical harvests in the Kodiak area occurred with enormous runs in most pink systems in the NW district. More recently, 2012 saw large west side pink runs outside of Karluk and 28% of the combined pink harvest in the Central and inner bay sections took place in the inner bays, indicating substantial runs to these terminal systems.

There is no data to suggest that fish harvested in all areas of the central section are primarily Karluk bound pink. If the proposal were to be accepted, then conducting a directed harvest of Karluk fish in the central section during poor pink salmon returns in the NW district would result to high rates of incidental harvest of depleted stocks. No tagging studies or genetic data exists to indicate that pink salmon caught in Kupreanof Straights, for example, are likely to be Karluk fish, and opening such a large area just for Karluk stocks could prove incredibly damaging.

Adoption of these proposals would necessarily imperil the potential of achieving large pink runs on even years on the west side of Kodiak if fishery managers were to choose to open the central section despite poor escapement to the major systems in this area. Additionally, Karluk-bound pinks can be harvested in the inner and outer Karluk section when other systems in the Northwest district are experiencing poor returns. Karluk is one of the few systems in the Kodiak Management Area that can be effectively managed terminally with high quality fish, so there is no need to include the Central section to direct harvest of Karluk bound pink salmon.

I'm the owner and operator of a 42-foot seiner and I fish exclusively in Kodiak for salmon, herring and tanner crabs.

Thank you,
Darren Platt



December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Support Proposals 72 and 73

To the members of the Alaska Board of Fisheries,

I'm writing in **support of proposals 72 and 73 if and only if these regulations only occur when king salmon numbers in the Ayakulik river have not met escapement objectives**. King salmon are in trouble and as commercial fishermen we must make some sacrifices to better help with the conservation of the Ayakulik Chinook. Management of the Ayakulik needs to explicitly account for escapement objectives for king salmon so that we better ensure preservation of the run and support for the recreational fishermen who utilize it.

This is a classic case where mutually conflicting goals of traditional management practices make it impossible to optimize harvest while conserving fish. We currently cannot optimize sockeye harvest while ensuring Chinook escapement in the Ayakulik river. Since the board is obligated to take a conservative management approach, and since it accepted that escapement and yield objectives cannot always be achieved simultaneously for all components of a mixed stock harvest, it is the responsibility of the board and fishery managers to either under-harvest and potentially over-escape Ayakulik sockeye or to risk further depleting Ayakulik Chinook stocks. The combination of these proposals 72 and 73 provides a perfect solution to balance between the two undesirable outcomes.

When Ayakulik sockeye runs are strong but King salmon runs weak, then short openings to the river mouth will allow for a "cleanup" of surplus reds without posing too large of a threat to Kings salmon returning to the system. Assuming that the non-retention program of king salmon will remain in place, then the subsequent closure will give released fish time to recover and potentially migrate upstream. The board should consider imposing longer closed periods between Inner Ayakulik openings, perhaps 48 to 72 hours. During these closed periods fishery managers should be encouraged to interact with weir personnel and to perform aerial surveys before announcing subsequent Inner Ayakulik openings in order to gauge whether an abundance of sockeye in the vicinity warrants additional fishing time at the river mouth.



I understand that large pulses of sockeye often show up at the Ayakulik, and that this proposal may imperil that run by critically over-escaping the Ayakulik system. Currently, this system has already been providing poor yields, so excessive escapement may further deplete the sockeye yields to point where we no longer have a fishery there, however, I believe that this risk is low compared to the threat currently facing Chinook and that as a commercial fishermen we must accept this risk and do our share to conserve depleted stocks in our own area.

I'm a resident of Kodiak and the owner/operator of a 42-foot seiner. I participate in the local salmon, tanner crab, and herring fisheries.

Thank you,
Darren Platt



David Little
P.O. Box KWP
Kodiak, AK 99697

December 22, 2019

Re: Proposals 37 and 58-66

Dear BOF Members,

I am concerned about proposals 37 and 58-66 and how these proposals would impact our salmon fishery and the community in which we live. I live in Village Islands, a small community located in Uganik Bay on the west side of Kodiak Island. Everyone here is connected to the Kodiak salmon fishery and everyone of us, seiner and set netter alike, focuses our fishing on the waters immediately surrounding our community. The possible closing of sections of our management area will drive boats into the bays, substantially impacting our catches and creating unprecedented gear conflicts. No one here is wealthy. Nearly everyone has loans on their boats, sites, and permits. Nearly all the income of the community comes from salmon.

The following is a brief description of the people who live here.

Shawna Rittenhouse, 57.

Salmon seiner and tender operator. Also active in other fisheries. Life long salmon fisherman. Entire family fishes salmon.

Steve Rittenhouse, 62.

Salmon set netter, works with family in other fisheries. All family members are salmon fishermen.

Michelle Rittenhouse, 32.

Salmon seiner and crew in other fisheries. Grew up and home schooled in Village Islands.

Sally Rittenhouse, 30.

Salmon seiner and crew in other fisheries. Grew up and home schooled in Village Islands.

Ron Dunlap, 86.

The community's most senior resident, Ron still crews as a salmon set netter.

Dave Little, 67.

Salmon set netter, crews in other fisheries.

Tollef Monson, 40.

Salmon set netter, crews in other fisheries, direct markets some of his fish in the lower 48, top 10 Iditarod finisher.

Adelia Myrick, 41.

Life-long salmon set netter, crews in other fisheries, direct markets some of her salmon in the lower 48.

Anitra Winkler, 26

Salmon set netter, crews in other fisheries, grew up and home schooled in a trapping family near Cantwell. Also teaches at the Alaska Avalanche School.

Linda Lindberg, 75.

Matriarch of the community. Takes care of everyone, including their mail.



Dave Lindberg, 74.

Retired salmon fisherman, active in various fisheries and assists with family's salmon operations.

In addition there are several residents who split their time between Village Islands and Kodiak. Again, nearly all of their income is from salmon fishing.

Harvey Goodell,

Salmon set netter as well as crew in other fisheries. Entire family fishes salmon.

Wendy Beck,

Salmon set netter. Has crewed in other fisheries. Entire family fishes salmon.

Naomi Beck-Goodell, life-long salmon set netter.

Jamin Price-Hall

Salmon set netter as well as crew in other fisheries.

Howard Peterson,

Salmon seiner and active in other fisheries.

Parry Nelson,

Salmon seiner and active in other fisheries.

In considering each of the proposals regarding our salmon fishery, please think of the people in communities such as ours, people whose lives could be substantially adversely impacted by your decision.

Thank you for your consideration,
David Little



Devin Koozaata
P.O. 83
Old Harbor, AK 99615

December 18, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Opposition to Proposals 58,59,60,61,62,63,64,37,65,66

Dear Board and Chairman:

I live in Old Harbor and I'm a fisherman. Fishing is really all I've ever done. I work on a local salmon vessel, the F/V Rolling Bay. Our whole crew was from Old Harbor. Fishing is about the only type of job available in Old Harbor. I don't want to see you take away the only way I can make a living. My skipper tells me that you might pass proposals that could take away 1/3 of my crew share. I just can't afford that. Why would you try to kill Old Harbor's fisheries?

I've heard about some sort of genetic study that showed we catch some Cook Inlet sockeye in Kodiak. You didn't need a study to show that. We know that some years the Cook Inlet fish hit here or there and some years they don't. It's no big deal or new information. I was told that in the early 1990's Fish and Game already estimated that there were Cook Inlet fish in the Kodiak area --- especially when they had a big run. I don't think that the fish we catch in Kodiak belong to the fishermen in Cook Inlet. I've always heard that these wild salmon were "common property". Why would you give Cook Inlet an ownership in fish?

The best thing for me about the Cape Igvak fishery is that a bunch of boats go over there and we have more room to fish and we don't have to wait so long in a line to make a set. That's why Cape Igvak is important to most of the boats in the Old Harbor fleet. I know it's tough to live in Chignik but it's tough to live in Old Harbor too. We're both village people. Why would they try to take our livelihood away? That's not right.

I've heard the older skippers talk about having to fight with Chignik and Cook Inlet for years on the very same issues. I appreciate that the Board in the past has kept the Kodiak fishery the same and rejected the Cook Inlet and Chignik proposals. I'm asking you to do that again. Just vote NO on proposals 58,59,60,61,61,63,64,37, 65&66.

Sincerely yours,

Devin Koozaata

Devin H Koozaata



Devin Skonberg
2930 Woody Way Circle
Unit B
Kodiak AK, 99615

12/26/19
Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 58,59,60,61,62

Dear Chairman Morisky and Board of Fish members:

My name is Devin Skonberg and I am a salmon seiner from the village of Ouzinkie, AK. I am 31 years old and started fishing when I was 11 years old with my grandpa James Skonberg Sr. I am currently part owner and full-time operator of my grandpa's 48-foot seiner the Lorena Marie. I bought my current share of the operation in 2007, and started running the boat in 2009 and the salmon fishery in Kodiak has been our primary fishery ever since my grandpa's halibut quota decreased to a level that did not make sense to go fishing for. I am writing today to request the Board of Fisheries **reject proposals 58,59,60,61, and 62.**

As I previously mentioned, salmon is the only fishery my operation currently operates in, and we make enough during the summer to pay for boat expenses and a small living expense on the side. In recent years without the Cape Igvak fishery as a dependable source of production, it is harder and harder to justify going fishing in June, as local runs to the Karluk and Ayakulik and other smaller sockeye producing systems have been smaller and less profitable. These proposals present a threat to a historical part of our fishing season, as during years when we are allowed to fish in Igvak, we tend to have much better production than when we are stuck on the Westside of Kodiak. In recent years, we haven't fished Igvak in June as a result of the weak runs there, and as much as the Chignik fishermen want to complain that the run failures are due in part to Kodiak fishermen fishing, that argument is simply not true. The Cape Igvak management plan gives Chignik sockeye stocks and fishermen every protection needed to make sure that we aren't causing any damage to the runs or the Chignik area economically. In addition, the argument is made that because salmon has been poor, the health of the villages in the Chignik area are dying, but I can honestly say this is a problem that is happening through all of coastal Alaska. My own village once had a small but effective fleet of salmon seiners, that is now reduced to 2 boats fishing, mine being one.

The Cape Igvak fishery has been under scrutiny every Kodiak board cycle for over 40 years. To make changes to this plan would be foolish and would undermine the care of which the plan was originally created. Please leave it alone and allow Kodiak fisherman the ability to historically participate in an aspect of our fishery we have always had access to.

Sincerely,


Devin Skonberg



Devin Skonberg
2930 Woody Way Circle
Unit B
Kodiak AK, 99615

12/26/19
Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 63,64,65,66

Dear Chairman Morisky and Board of Fish members:

My name is Devin Skonberg and I am a salmon seiner from the village of Ouzinkie, AK. I am 31 years old and started fishing when I was 11 years old with my grandpa James Skonberg Sr. I am currently part owner and full-time operator of my grandpa's 48-foot seiner the Lorena Marie. I bought my current share of the operation in 2007, and started running the boat in 2009 and the salmon fishery in Kodiak has been our primary fishery ever since my grandpa's halibut quota decreased to a level that did not make sense to go fishing for. I am writing today to request the Board of Fisheries **reject proposals 63,64,65, and 66.**

These proposals are in response to the genetic study that was conducted during 2014-2016 to identify sockeye salmon stocks caught within the Kodiak Management Area (KMA). Cook Inlet fisherman have locked onto an idea that this genetic study uncovered something new, the presence of Cook Inlet stocks in Kodiak's commercial harvest. This is not something new; my grandpa who fished Kodiak from 1962 till 2008 could tell you that Cook Inlet bound sockeye have been traveling through Kodiak waters every year since he fished. In some years, they travel through in larger volumes than others, but it is not up to the fisherman to decide which way they swim and when. These fish have made up a historic allocation of Kodiak fishermen's harvest and any attempts by Cook Inlet fisherman to try to change that is purely out of greed with no consideration to the economic harm these proposals could have on our communities. These proposals are written with no understanding or consideration for the well-developed and established Kodiak Management Plan. This plan was created as one of the most complex management plans in existence and takes into account the varying run timings and species of the numerous salmon producing systems around Kodiak and Mainland.

Please leave the Kodiak Management plan alone. It is our last economic driver as participators in commercial fishing and these proposals threaten the very livelihood my grandpa and numerous other villagers have existed on for hundreds of years.

Sincerely,

Devin Skonberg



Dwayne Inga
PO Box 85
Old Harbor
99643

12/18/19

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

RE: Proposal 58,59,60,61,62

Dear Chairman Moriskey and Board of Fish members:

My name is Dwayne Inga, and I am a 39-year old resident, born and raised in Old Harbor Alaska. I started fishing salmon when I was 13 years old and can say without a shadow of a doubt that salmon fishery has been my primary livelihood over the last few years. Opportunities in other fisheries has ceased to exist and I stay busy during the winter months working for the local native tribe organization in Old Harbor. **Please reject all proposals to make changes to the Cape Igvak fishery.**

We haven't been able to fish in the Cape Igvak fishery over the last few years as a result of the poor runs to the Chignik river system. As a crewmember, this is very frustrating as fishing in June is usually very scratchy with not a lot of fish and long summer days. When we have been able to fish at Igvak, we usually end up with a way better start to the season. As the salmon fishery is my primary source of income for the year, it makes me nervous to see proposed changes to a part of our fishery that has usually been a large portion of my summer settlement. I respectfully request the Board leave the Cape Igvak fishery alone.

Sincerely,

Dwayne Inga



Dwayne Inga
PO Box 85
Old Harbor
99643

12/18/19

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

RE: Proposal 63,64,65,66

Dear Chairman Moriskey and Board of Fish members:

My name is Dwayne Inga, and I am a 39-year old resident, born and raised in Old Harbor Alaska. I started fishing salmon when I was 13 years old and can say without a shadow of a doubt that salmon fishery has been my primary livelihood over the last few years. Opportunities in other fisheries has ceased to exist and I stay busy during the winter months working for the local native tribe organization in Old Harbor. **Please reject proposals 63,64,65, and 66.**

The proposals put forward to close areas of the Kodiak salmon fishery because Kodiak fishermen catch some Cook Inlet sockeye don't seem to show a true understanding of the nature of the Kodiak fishery. In reading these proposals, you would think Kodiak fisherman only catch sockeye. As a crewmember, I make the majority of my season on the amount of pink salmon we catch, with a much smaller portion coming from sockeye and chum. All of these proposals suggest closing area or limiting time to prevent the harvest of sockeye, yet forget about the importance of the other fish species to the fishery. Any changes to the Kodiak management plan would seriously affect my ability to make enough money from salmon to help support me through the winter.

Sincerely,

Dwayne Inga



Edward Pestrikoff
Box 56
Old Harbor
99643

12/19/19

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

RE: Proposal 63,64,65,66

My Name is Edward Pestrikoff and I am an Old Harbor resident and current store owner. I have been involved in the Kodiak Salmon fishery since I was 5 years old in 1952. I started running skiff for my dad when I was 12 years old. I currently own and run a 51-foot seiner in Old Harbor, with the salmon fishery being my primary source of income from fishing. **I oppose the proposals from Cook Inlet fisherman** attempting to shut down area and time during our summer salmon fishery.

The proposals from Cook Inlet fisherman attempt to limit the incidental harvest of Cook Inlet bound sockeye in the Kodiak salmon fishery. Kodiak fisherman have been harvesting a small portion of the Cook Inlet runs every year since commercial fishing started in Kodiak over 120 years ago. An allocation of those fish has been written into the Kodiak management plan under the North Shelikof Sockeye management plan. These proposals would cause severe economic harm to the Kodiak fishery and the community of Old Harbor. The wide-reaching effects of these proposals would limit our ability to harvest strong pink, chum, and sockeye runs as lined out in Kodiak's longstanding management plan.

Please **reject** all the proposals to curtail the Kodiak fishery. The fishery is so valuable to the community of Old Harbor it cannot be emphasized how negatively impactful these proposals would be with little to no measurable gains to Cook Inlet fishermen.

Sincerely,

Edward Pestrikoff



Edward Pestrikoff
Box 56
Old Harbor
99643

12/18/19

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

RE: Proposal 58,59,60,61,62

My Name is Edward Pestrikoff and I am an Old Harbor resident and current store owner. I have been involved in the Kodiak Salmon fishery since I was 5 years old in 1952. I currently own and run a 54-foot seiner in Old Harbor, with the salmon fishery being my primary source of income from fishing. **I oppose the proposals from the Chignik fishermen** attempting to shut down area and time during the Cape Igvak fishery.

I have fished the Cape Igvak fishery, and in recent years, as a result of low runs to Chignik, we haven't had the Cape Igvak fishery and it is much more difficult to make any money anymore in June. The Cape Igvak management plan was developed because of the historic fishing patterns of fisherman in that area prior to the creation of limited entry and the decision to create management area boundaries. The fishery in Igvak created opportunity for me when I was younger to fish areas closer to home such as Alitak by drawing Kodiak boats away from our traditional fishing areas. In later years when southend runs were weak, the Igvak fishery allowed me an opportunity to make money in June. Without it I would have had numerous years with difficulty paying pre-season bills by the time they came due at the end of June.

It's important for the Board to realize that the Chignik river has experienced poor runs in the last few years, but that is not as a result of Kodiak fisherman placing any burdens on those runs. The management plan in Igvak doesn't allow us to fish in years of low abundance, and when we are allowed to fish, Chignik fisherman have to have already been fishing. The poor runs in Chignik are due to the natural ebb and flow of run strengths over time. I have seen it time and time again with local sockeye stocks in Kodiak, including the major systems such as Karluk, Ayakulik and the south end systems.

Please leave the Cape Igvak management plan alone.

Sincerely,

Edward Pestrikoff



Emil Christiansen Sr.

8211 DeBarr Rd.

Anchorage, AK 99615

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK

Re Opposition: to Proposals 58,59,60,61,62,63,64,37,65,66

Dear Alaska Board of Fisheries:

I'm a life-long Kodiak salmon fisherman from Old Harbor. I've fished crab, herring, cod, halibut but now all I have left is salmon.

Here we are again, fighting for our right to exist as a fishing community. This time it is both Chignik and Cook Inlet coming after us,

Why do Kodiak commercial fishing regulations have to change every three years? What is it that prompts board members to think we need to change yet again? I come to your meetings every three years and have to fight to keep my fishery. We don't go trying to take away some else's fishery. Yet, every three years we're back here having to persuade you to just leave us alone. The fish we catch are a common property resource and have been allocated to our area by the board repeatedly over the past several decades. Let's leave things alone for once and we can go home and be happy with what we have – the opportunity to fish another season.

It is clearly impossible to forego more incidental harvest of Cook Inlet bound salmon in Kodiak without dramatically restricting Kodiak's fishery. Kodiak and Cook Inlet salmon fisheries have fundamentally different properties. Cook Inlet catches approximately 3 million salmon a year, most of which are sockeye. Kodiak catches approximately 15 million salmon, most of which are pinks.

Does it make sense to you that Kodiak should forego millions of bright pinks in order to add a few thousand more sockeye in Cook Inlet? If you take the Kodiak fleet off the capes and push the fleet up into the bays to harvest black pinks, what is the considerable cost in lost quality? Do you believe the losses in Kodiak from a wholesale destruction of its seven local stock management plans would be balanced by much smaller, likely undetectable gains in Cook Inlet?

If the UCIDA proposal, # 66, were adopted, the various sockeye caps would be achieved in just a day or two of fishing. Without fishing opportunity many vessels, set net sites, tenders, and



processors would find it unmanageable to operate at all. Permit prices would plummet, more permits would go unfished, businesses would close, and Kodiak Island communities would suffer. The small gains realized by Cook Inlet fishermen could not offset the economic gutting of Kodiak's salmon fishery.

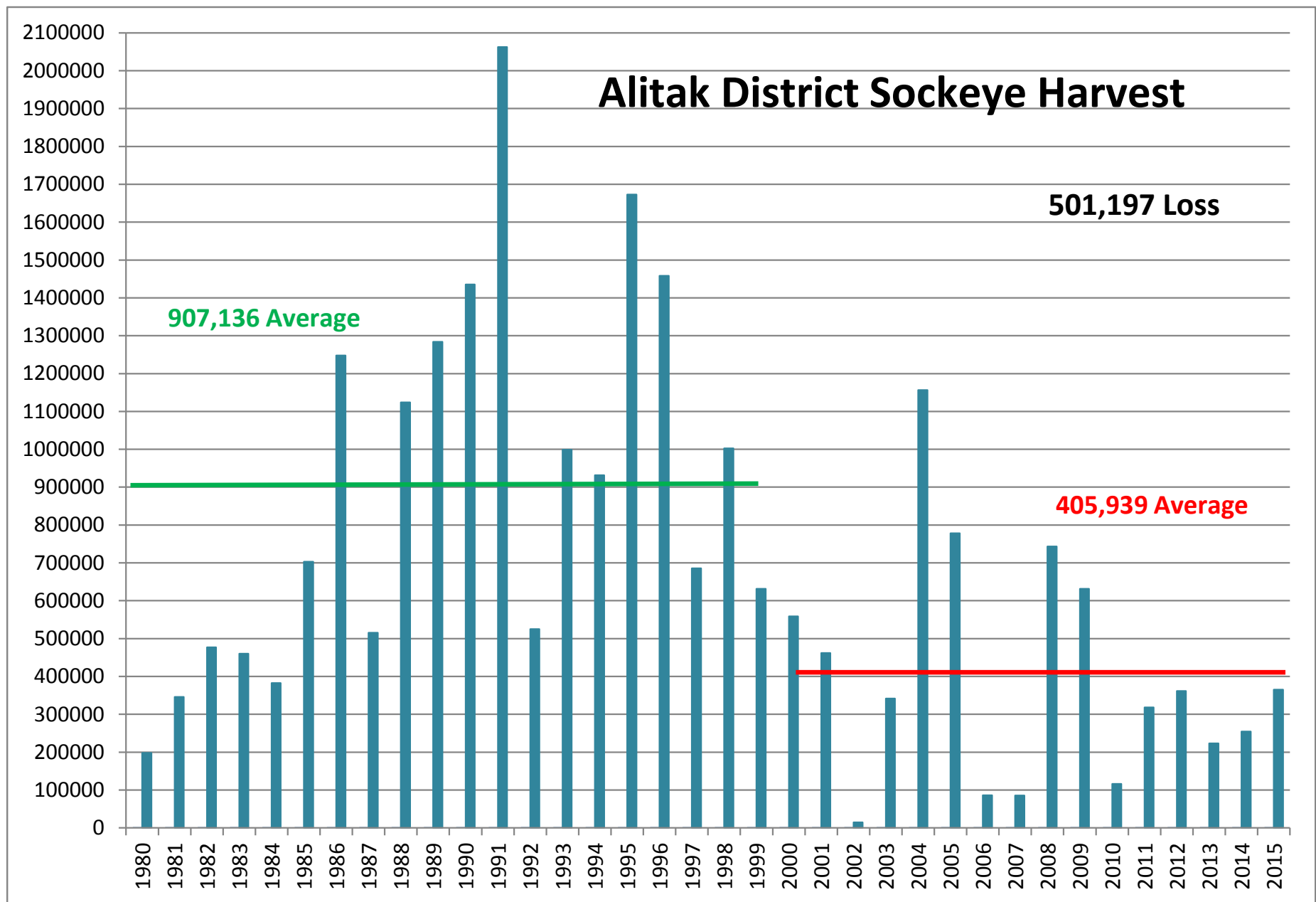
Under the standards of the Board's Mixed Stock Policy and the allocation criteria, balancing of gains and impacts must occur. Otherwise the policy and the criteria would long ago not have survived judicial review. Economic harm in Kodiak under proposal 66 and others is not balanced by economic gain in Cook Inlet.

The seven local stock management plans adopted by the Board many years ago insure that the Kodiak fishery remains stable, and that the passage of sockeye to Cook Inlet is optimized to the maximum extent consistent with the Mixed Stock Policy and the allocation criteria.

As fishermen we need to get along and work together. We shouldn't be fighting each other every three years. If you change Kodiak's management this year, then we'll have to fight to change Chignik's management in a couple of years and Cook Inlet's management three years from now. Why start that kind of conflict over and over? I ask you to let the Cape Igvak Management plan stay the same and to retain the current North Shelikof Management Plan. Please vote NO on proposals 58,59,60,61,62,63,64,65,66, and 37!

Thank you.

Emil Christiansen. Sr.





Frazer 1975-2009

Escapemen	Total return	R/S	Theoretical yield
0	0	0	0
25,000	105,944	4.24	80,944
50,000	182,151	3.64	132,151
75,000	234,883	3.13	159,883
100,000	269,226	2.69	169,226
125,000	289,304	2.31	164,304
150,000	298,444	1.99	148,444
175,000	299,320	1.71	124,320
200,000	294,073	1.47	94,073
225,000	284,403	1.26	59,403
250,000	271,656	1.09	21,656
275,000	256,885	0.93	-18,115
300,000	240,910	0.80	-59,090
325,000	224,359	0.69	-100,641
350,000	207,709	0.59	-142,291
375,000	191,314	0.51	-183,686
400,000	175,429	0.44	-224,571
425,000	160,235	0.38	-264,765
450,000	145,851	0.32	-304,149
475,000	132,348	0.28	-342,652

Upper Station early run 1975-2009

Escapemen	Total return	R/S	Theoretical yield
0	0	0	0
10,000	35,660	3.57	25,660
20,000	65,554	3.28	45,554
30,000	90,382	3.01	60,382
40,000	110,768	2.77	70,768
50,000	127,267	2.55	77,267
60,000	140,375	2.34	80,375
70,000	150,531	2.15	80,531
80,000	158,128	1.98	78,128
90,000	163,514	1.82	73,514
100,000	166,995	1.67	66,995
110,000	168,845	1.53	58,845
120,000	169,304	1.41	49,304
130,000	168,586	1.30	38,586
140,000	166,877	1.19	26,877
150,000	164,343	1.10	14,343
160,000	161,128	1.01	1,128
170,000	157,359	0.93	-12,641
180,000	153,146	0.85	-26,854



Upper Station late run 1975-2009

Escapemen	Total return	R/S	Theoretical yield
0	0	0	0
20,000	94,696	4.73	74,696
40,000	180,136	4.50	140,136
60,000	256,996	4.28	196,996
80,000	325,913	4.07	245,913
100,000	387,480	3.87	287,480
120,000	442,249	3.69	322,249
140,000	490,738	3.51	350,738
160,000	533,431	3.33	373,431
180,000	570,778	3.17	390,778
200,000	603,199	3.02	403,199
220,000	631,088	2.87	411,088
240,000	654,810	2.73	414,810
260,000	674,705	2.60	414,705
280,000	691,090	2.47	411,090
300,000	704,262	2.35	404,262
320,000	714,496	2.23	394,496
340,000	722,046	2.12	382,046
360,000	727,152	2.02	367,152
380,000	730,033	1.92	350,033



Upper Station/Akalura Harvest

("LATE-LATE"; AUGUST 25-29) 2014

	2014
Uganik-Kupreanof	6,915
Uyak	10,186
Karluk-Sturgeon	7,045
Ayakulik-Halibut Bay	??
W & SW COMBINED HARVEST	24,146

5 day period to catch 24,146 Late Upper Station Sockeye

("Late"; July 26–August 29) 2014

	2014
Alitak District Seiners Harvest	3,449

35 day period to catch 3,449 Late Upper Station Sockeye

Data in this document was used from the Genetic Stock Composition
of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016



Ayakulik/Frazer Harvest "Early" (June) 2014

	2014
Uganik-Kupreanof	12,571
Uyak	18,819
Karluk-Sturgeon	19,980
Ayakulik-Halibut Bay	116,247
W & SW COMBINED HARVEST	167,617

Alitak District Seiners Harvest	0
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Upper Station/Akalura Harvest "Early" (June) 2014

	2014
Uganik-Kupreanof	524
Uyak	1,523
Karluk-Sturgeon	1,622
Ayakulik-Halibut Bay	4,539
W & SW COMBINED HARVEST	8,208

Alitak District Seiners Harvest	0
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Data in this document was used from the Genetic Stock Composition
of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016



Genetic Stock Composition Information for Alitak Sockeye

Upper Station/Akalura Sockeye Harvest

	2014	2015	2016
Uganik-Kupreanof	8,203	966	-
Uyak	13,411	-	2,006
Karluk-Sturgeon	13,723	4,045	3,810
Ayakulik-Halibut Bay	20,529	11,691	4,142
W & SW COMBINED HARVEST	55,866	16,702	9,958

Alitak District Seiners Harvest	8,829	12,665	17,264
Estimated Alitak Setnet Harvest	14,224	26,152	28,991
Total Alitak District Harvest	23,053	38,817	46,255

Escapement Total ER+ LR	218,234	187,337	193,060
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TOTAL RUN Escapement + Harvest	297,153	242,874	249,273
W & SW COMBINED HARVEST	18.80%	6.88%	3.99%
Total Alitak District Harvest	7.81%	15.98%	18.55%

Data in this document was used from the Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016 and Kodiak Management Area Salmon Escapement and Catch Sampling Results, 2014 -2016



Ayakulik/Frazer Sockeye Harvest

	2014	2015	2016
Uganik-Kupreanof	17,431	3,715	1,380
Uyak	29,466	2,258	7,264
Karluk-Sturgeon	45,406	15,081	5,115
Ayakulik-Halibut Bay	236,602	252,727	62,295
W & SW COMBINED HARVEST	328,905	273,781	76,054
70% Ayakulik /30 % Frazer	230,234 / 98,671	191,647 / 82,134	53,238 / 22,816

Alitak District Seiners Harvest	66,942	55,537	24,579
70% Frazer / 30% Ayakulik	46,859 / 20,083	38,875 / 16,662	17,205 / 7,374

Estimated Alitak Setnet Harvest	112,031	89,556	49,636
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Escapement Total Frazer Lake	200,296	219,093	122,585
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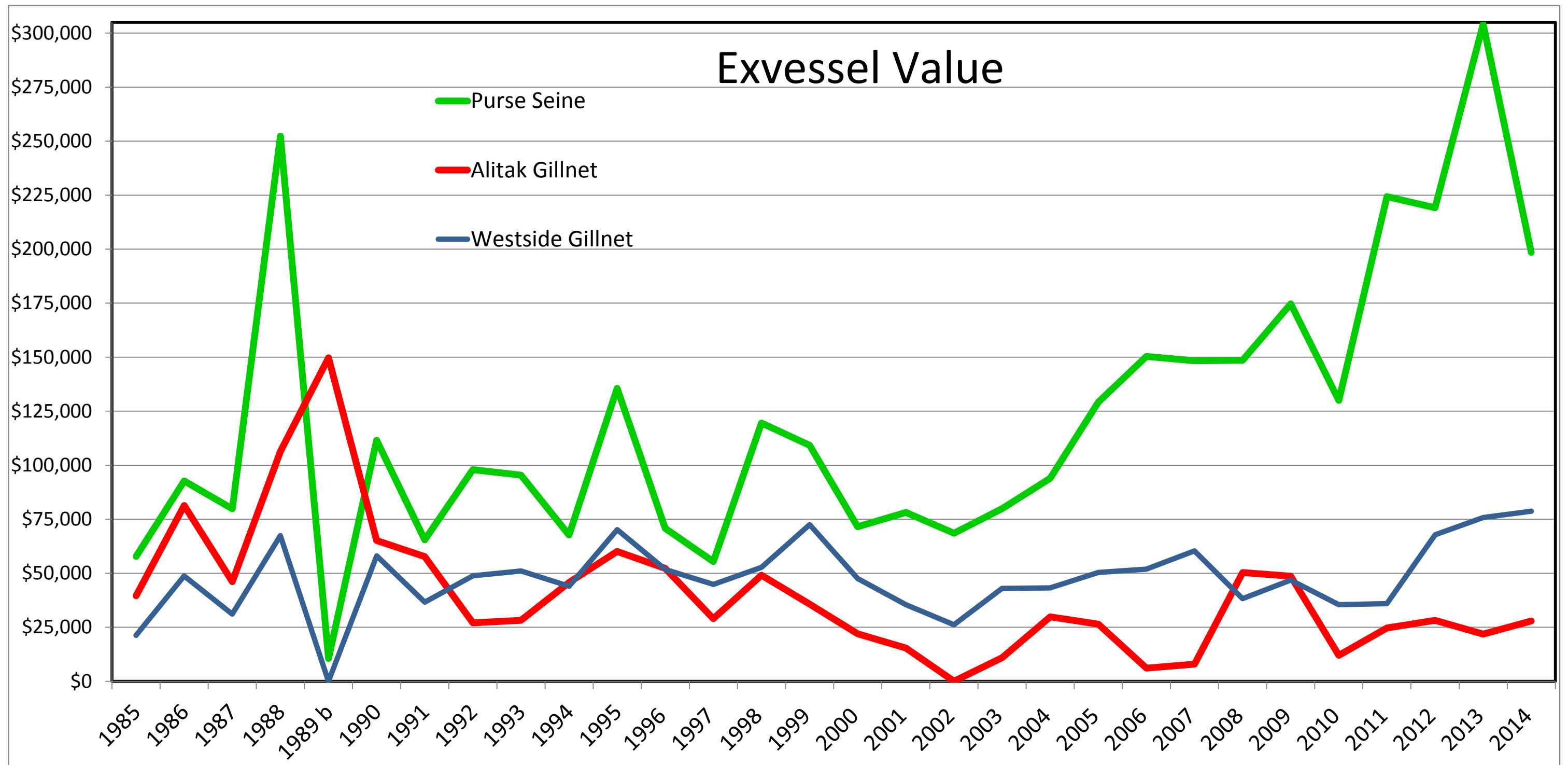
TOTAL RUN Escapement + Harvest	457,857	429,658	212,242
W & SW COMBINED HARVEST	21.5% at 30% ratio	19.1% at 30% ratio	10.7% at 30% ratio
Alitak Setnet + Seiner(70%) Harvest	34.7% at 70% ratio	29.8% at 70% ratio	31.4% at 70% ratio

Numbers below show hypothetical mixed percentages of Frazer and Ayakulik sockeye

	2014	2015	2016
W & SW COMBINED HARVEST	328,905	273,781	76,054
50% Frazer/ 50% Ayakulik Sockeye	164,452/164,452	136,890/136,890	38,027/38,027
40% Frazer/ 60% Ayakulik Sockeye	131,562/197,343	109,512/164,269	30,421/45,633
30% Frazer/ 70% Ayakulik Sockeye	98,671/230,234	82,134/191,647	22,816/53,238

Alitak District Seiners Harvest	66,942	55,537	24,579
50% Frazer/ 50% Ayakulik Sockeye	33,471/33,471	27,768/27,768	12,289/12,289
60% Frazer/ 40% Ayakulik Sockeye	40,165/26,777	33,322/22,215	14,747/9,832
70% Frazer/ 30% Ayakulik Sockeye	46,859/20,083	38,875/166,62	17,205/7,374

Data in this document was used from the Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016 and Kodiak Management Area Salmon Escapement and Catch Sampling Results, 2014 - 2016





Pulse Fishing

- Is a natural way for systems to rebuild via escapement, without man made enhancement and fertilization projects.
- Allows the “Mixed Stock” and “Sustainable Salmon fisheries” to function as conservation tools as they were intended.
- Allows “Traditional Harvest Areas” for both subsistence and commercial to remain in place.
- Allows runs to stay strong for future returns and large surplus harvest opportunities for all fishermen.
- Ensures a “precautionary approach” to keeping an ecosystem/industry relationship at a healthy balance.
- Gives ADF&G the power to manage an Island migratory ecosystem more effectively than a district by district policy with political boundaries.
- The “*Burden of Conservation*” will be shared more by the *entire* migratory pathway harvest user group rather than just the *end* harvest user group.

Commercial Salmon Fishing Regulations

Migratory Habitats and Pathways should be protected

-5AAC 39.222 (c) (A) (iv) page 68

“Escapement Protection and **Precautionary** Conservation of salmon”

-5AAC 39.222 (c) (2) (D,E,F,H) Page 69

“Primary goal to **protect sustained yield**, while at the same time providing an **equitable distribution of harvest** between various users”

-5AAC 39.200 (a) page 65

Mixed Stock Fisheries. 5AAC39.220 (b) page 67

-**Burden of conservation** should be shared respective to their harvest on the stock of concern.

High Impact **Emerging** Commercial Fisheries

-5AAC 39.210. (a)



Topics of Concern for the Alitak District.

Fishing pressure is too intense island wide.

Leaving harvest areas open “Extended until further notice” is not good for salmon ecosystems. Alitak district is the only area with a mandatory pulse cycle. Alitak District sockeye fishermen are often “closed until further notice”, while surrounding sections and districts are kept “open until further notice”.

Migratory pathways of sockeye are known, but are not being protected.

Interception harvest issues need to be addressed. Placing the burden of conservation solely on the Alitak end user group is putting fishermen out of business. Traditional harvest areas are no longer profitable.

Lack of protection of sockeye escapement has put Alitak District runs at risk.

Escapement trends are considerably lower than what they used to be. What kind of future return size can we expect from low escapement in the lakes? Escapement should be the top priority of ADF&G, fishermen, and processors.

When ADF&G is trying to obtain escapement, more than one Section/ District should be able to be closed for the protection of that respective run. Keeping the sockeye section of the Alitak District closed has proven to be not enough protection for the runs. Minimum escapement is not always achieved.

Alitak District has some of the Islands largest salmon runs, but receives the least amount of attention via Research and Management protection.

New styles of harvesting, and advanced gear technology have emerged making harvest more efficient island wide. ADF&G has not implemented any new protective measures to counter balance the advanced fleet pressure. Pulse Fishing management style needs to be extended out beyond the boundaries of the Alitak District.

Pulse open/closures are a simple management tool that should overrule District by District management plans when minimum escapement is needed. Migration pathways and run timing always need to be considered for the health of Sockeye bound for the Alitak district.

Alitak District is a complex area to manage because of the geographic location and multiple choke points that salmon must migrate past.

This area requires more attention from both the research and management.



RE: Comment on multiple proposals

My family has fished Kodiak setnet since 1977, I have been a participant since 1992 and an owner operator since 2002. Kodiak setnet is traditionally a family business, and unfortunately a fishery that is approaching a point of no longer being viable. Our family has been very lucky and worked very hard to build a business that we hoped to sustain ourselves. We make investments every year, and between the 5 families that contribute, all have jobs in the off season in hopes of perpetuating our ability to continue setnet fishing salmon in Kodiak. I am very proud to be a part of a sustainable managed fishery; however that statement has implications. One gear group cannot improve their allocation of the fishery without taking from another. We have become very effective at harvesting everything at a maximum sustainable level. For setnetting this means that we have lost out to other gear types and fisheries, as our harvest methods have basically remained unchanged while others improve. I do not fault others for increasing efficiency; although I do fault our selves for not becoming more efficient, or more appropriately, not changing the rules of our fishery to remain viable. If we continue to lose allocation to other districts and other gear types setnet fishing will cease to be a viable fishery. Said another way: hard working Alaskan fishing families such as mine will cease to be involved in our fishery. We must be allowed to improve our efficiency and maintain our historical allocation of the harvest of Kodiak salmon.



Ernest Torsen

P.O. Box 63

Ouzinkie Alaska 99644

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811

Vote NO on proposals 37,58,59,60,61,62,63,64,65,66.

Dear Board Members:

I am a lifelong fisherman and resident of Ouzinkie and Kodiak's salmon fishery is important to me. It makes me mad that every few years someone is trying to take away from Ouzinkie's fishermen. Who owns the salmon that travel through the Kodiak area? Cook Inlet fishermen say they do. Chignik fishermen say some of those fish are theirs. But Kodiak fishermen have been fishing the same way for over a hundred years. These issues were decided 30 or 40 years ago!

The Alaska Constitution settled this question. That document provides that fish are reserved to the people for common use. It's called the "common property" clause. Also, the Constitution provides for no exclusive right of fishery. So, the fish everywhere belong to everyone, not to one particular group who may reside close to where salmon spawn.

The Alaska Legislature has directed that you, the Board of Fisheries, decide who gets to catch the fish based on the statutory allocation criteria. First among these is history. In the case of Kodiak and Cook Inlet, both areas have a long history of taking sockeye salmon, over 125 years. Cook Inlet does not deserve a preference based on this criterion.

Other important criteria include state and local economies. It would be difficult to justify a new preference for Cook Inlet over Kodiak based on economics and the economy of a village like Ouzinkie. Commercial sockeye fishing in both areas is important to local and state economies, but the Kodiak salmon fishery, which harvests primarily pinks and which would be greatly disrupted by attempts to limit bycatch of sockeye, is much larger than the Cook Inlet fishery.

Other allocation criteria relate to taking fish for food or recreation. Again, both areas have robust food and recreational fisheries, and finding that one area deserves a new preference would be destructive to the balance that has evolved over decades. I do want to thank the board for the exclusive subsistence area you created in the Ouzinkie harbor. This is a fishery I participate in every year to help feed the community.

No drastic changes are warranted in the Kodiak fishery at this time based on the board's allocation criteria, and based on the constitutional principle of common property. I urge the Board to retain the status quo. Vote NO on proposals 37,58,59,60,61,62,63,64,65 & 66.

Sincerely yours,

Ernest Torsen



Ernie Carlson
FV Desperado
PO Box 21
Chignik, AK 99564



Alaska Board of Fisheries

Board Support Section
PO Box 115526
Juneau, AK 99811-5526

10 December 2019

Subject: Cape Igvak- **Proposals 60 and 61.**

Dear Alaska Board of Fisheries:

I am a life-long Chignik commercial salmon fisherman who depends on the Chignik salmon fishery to support my family and my three crewmen and their families from Chignik Lake Village.

The Chignik salmon fishery is solely managed on its two Chignik River sockeye runs. And unlike Kodiak and Area M, Chignik has no interception salmon fisheries or any other local sockeye stocks to depend upon when its two sockeye runs fail. It is evident that Chignik's two sockeye runs are no longer what they use to be, darn strong. In 2017, 2018, and 2019 Chignik's early run failed and in 2018 the same occurred on the late run. The Chignik forecast for 2020 on the early run is for a likely repeat of no fishery, and the late run is not expected to be strong.

Per F&G, the 2009-2018 Chignik harvest averaged 1.4 million while the 2014-2018 harvest averaged 0.9 million, a 36% decrease (Chignik Season Summary, F&G, 11/6/19). This last season (2019), the Chignik salmon fishery harvested only 648,000 sockeye salmon. Again the 2020 Chignik forecast is for a repeat of a no early-run fishery, and the late run is expected to provide below average opportunity.

Specifically please consider the following four points when you take up **Igvak proposals 60 and 61**:

1. When the Igvak interception fishery was pioneered in 1964, Chignik's two sockeye runs were healthy and remained such until more recently. Comparatively the Kodiak sockeye runs were severely depressed in the 1960's and 1970's and the Cape Igvak fishery provided an opportunity to redistribute revenue away from Chignik to Kodiak---
- socialism.
2. Now Chignik is weak and Kodiak sockeye stocks are healthy. Kodiak has 39 significant sockeye-producing streams, two hatcheries, and several notable newly developed runs. Chignik has but its two sockeye runs and not a single hatchery or enhanced or introduced salmon run of any species. Economically Chignik is totally dependent on local salmon production, while Kodiak has not only many salmon-producing fisheries but many other economic components (ground & shellfish fisheries, tourism, USGC base, numerous service industries, space station, ranching, and a university system).
3. Kodiak no longer needs the Igvak fishery. Its sockeye harvest has more than doubled from when the Board adopted the Igvak fishery. Per F&G the 1973-77 Kodiak average was only 397,000 and in 1978 when the Board sanctioned Igvak, the catch increased to 1.0 million sockeye salmon. Now Kodiak is averaging 2.3 million sockeye (2009-18), and last season (2019) the catch was 2.2 million. In perspective Chignik harvested 0.6 million in the 2019 fishery and a mere 128 sockeye salmon in their 2018 'fishery.'
4. Chignik needs your help. It needs relief in the good years, if there are to be any more, as well as in the mediocre and poor years. The Board can greatly assist Chignik by passing Igvak Proposals 60 and 61.

Thank you.
Sincerely



Freddie Christiansen
PO Box 56
Old Harbor

12/18/19

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

RE: Proposals 63, 64, 65, and 66

Dear Chairman Morisky and Board of Fish members:

I am a lifelong resident of Old Harbor, Alaska on the eastside of Kodiak island. I have been involved in the salmon fishery in Kodiak since I was 6 years old, with my first paycheck from fishing came in 1969. In those days salmon was our mainstay, prior to the crab boom of the 1970s. I've lived through tremendous negative impacts of the Old Harbor community through changes in management such as the limited entry and IFQ programs. I respectfully request the board **reject** these proposals to change the Kodiak management plan and allow Kodiak fisherman to continue the historic harvest patterns I have enjoyed since I was a child.

The proposals from fisherman in Cook Inlet fail to recognize the historic harvest of Cook Inlet bound sockeye in the Kodiak fishery. As far as I can remember, the incidental, historic harvest of these sockeye has been entirely relative to the strength of the Cook Inlet run. It is a matter of fact that in years of strong Cook Inlet returns, Kodiak fisherman harvest more Cook Inlet origin sockeye simply by nature of the geographic location of Kodiak in the Gulf of Alaska. Does the harvest of these sockeye cause detriment to the strength of the Cook Inlet runs, absolutely not. This historic harvest has occurred since commercial fishing existed in the Kodiak area, well over 100 years.

I respectfully request you leave the Kodiak management plan alone. These proposals could cripple the healthy and historic Kodiak fishery while creating an immeasurable gain to the Cook Inlet region.

Sincerely,

Freddie Christiansen



Freddie Christiansen
PO Box 6
Old Harbor AK
99643

12/18/19

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

RE: Proposals 58, 59, 60, and 61

Dear Chairma Morisky and Board of Fish members:

I am a lifelong resident of Old Harbor, Alaska on the eastside of Kodiak island. I have been involved in the salmon fishery in Kodiak since I was 6 years old, with my first paycheck from fishing came in 1969. In those days salmon was our mainstay, prior to the crab boom of the 1970s. I've lived through tremendous negative impacts of the Old Harbor community through changes in management such as the limited entry and IFQ programs. I respectfully request the board **reject the proposals** to change the Cape Igvak management plan and place any further restrictions on the Kodiak Salmon fishery.

I am sympathetic to the fisherman of Chignik as they have experienced what no fisherman should have to, the decline of a revenue stream they rely on, however recognize that the Kodiak Fisherman did not in any way cause the decline of Chignik stocks. The Cape Igvak management plan prevents that from happening through safeguards to protect the Chignik sockeye runs biologically. In addition, allocation protections also exist that guarantee Chignik fisherman are allowed to harvest 300,000 sockeye before any fishing time exists for Cape Igvak fisherman. It is therefore impossible for Kodiak fishermen to be held at fault for the economic downturn in the Chignik area.

The Cape Igvak management plan exists because Kodiak fisherman have historic harvest patterns in that area, and that plan has undergone significant review by previous Boards to find deficiencies that need to be addressed. They haven't found any, and what remains is the second longest standing management plan in the state. The economic hardships in Chignik will not be fixed by changes to this management plan, therefore any changes should be rejected.

Sincerely,

Freddie Christiansen



From: [Gabriel Edwards](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: proposals
Date: Thursday, December 26, 2019 8:59:59 AM

Hello, my name is Gabriel Edwards. I'm a 31 year old commercial salmon setnet fisherman and lifelong resident of Kodiak Island, Alaska. I would like to comment on the following proposals:

Proposal #67: Our setnet industry has been burdened lately with a large increase in green algae blooms/"slime" on our gillnets. Although "slime" has long been an occasional factor in our industry, in recent years it has gotten much worse, and I feel like this proposal could potentially make the situation better for us. Monofilament may make the gillnets easier to clean and I don't see any real downside regarding its use, so I'm supporting this proposal.

Proposal #71: Ensuring that management targets are attained before inner bay fish are harvested seems like something which should be an obvious priority. Lately it seems like the setnet fishery has been disadvantaged by a model that greatly limits the opportunities setnetters have to harvest the resource, and instead relies on the seine fleet to fulfill that role once the fish have reached the inner bays. To me the idea that nets which are fixed to the shore (setnets) would have a more deleterious effect on the resource than mobile operations which can target it anywhere (seiners) is bizarre. I'd prefer a system in which both geartypes get a fair shot at harvesting and the resource is protected, so I support this proposal.

Proposals re: Cook Inlet: I'm 100% against any changes resulting from the Cook Inlet issue which would adversely affect the Kodiak fisheries management plan. I last wrote about this issue several years ago and my opposition has not changed since that time.

Garman Squartsoff
Box 112
Ouzinkie, AK 99644



PC535
1 of 1

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Vote NO Proposals 37,63,64,65,66

Dear Board of Fisheries Members:

I'm a crewman and I live in Ouzinkie. My family for several generations is from Ouzinkie. I've both gillnetted and seined salmon with Ouzinkie permit holders. Fishing is my primary income. I'm learning about the fisheries but I can already see that it doesn't make sense to close down Kodiak's July fishery because of a guess that Cook Inlet sockeye may be passing through our area. We setnet in inside waters and sometimes catch what appear to be Cook Inlet bound sockeye. Closing more of the Shelikof or moving boats to the capes won't stop our catch of Cook Inlet fish when they are here. To me it's like closing the gate after the cows are gone. You'll always be trying to regulate last years salmon run. I say stay with the way things are and reject proposals 63,64,65 and 66.

Proposal 66 is the same thing as the Board saw in September 2017 and similar to what UCIDA proposed years ago. I can read any real justification in the proposal's language except an allusion to a "genetic study" The Shedd genetic study from 2014-16 does not lend itself to be used for allocation purposes. Consequently, proposal 66 has no real justification, no foundation, solves no problems in Cook Inlet, and, from what I understand, it would be impossible to measure the effects of the proposal in Cook Inlet.

It is possible, however, to measure the impact to the Kodiak seine fleet of implementing proposal 66. The 6-year average annual foregone loss to Kodiak fishermen if you adopt Proposal 66 would be 3.5 million dollars. In 2019 alone, 4.5 million dollars would have been lost. Fish bound to Cook Inlet through Kodiak seine fisheries are an unknown but tiny fraction of that 4.5 million dollars. For the seine fishery the average annual loss per permit holder over the past six years would be \$42,800. That's each year for each permit. How many of you can give up \$43,000 per year and survive? The effect on Ouzinkie as well as Kodiak would be devastating. The annual benefit to Cook Inlet commercial fishermen, if noticeable, would be far, far less than 4.5 million dollars

Why would you consider taking such a drastic action that has never before been imposed on any commercial fishery in Alaska? No board has ever intentionally ripped the heart out of a long-standing stable salmon fishery for purely allocative reasons without a shred of conservation concern being present. Vote No on 63,64,65,66 & 37.

Sincerely yours,

Garman Squartsoff

Gary Boskofsky



PC536
1 of 1

P.O. Box

Ouzinkie Alaska 99644

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811

Vote NO on proposals 37,58,59,60,61,62,63,64,65,66.

Dear Board Members:

I am a life long resident of Ouzinkie and Kodiak's salmon fishery is important to me. It makes me mad that every few years someone is trying to take away from Ouzinkie's fishermen. Who owns the salmon that travel through the Kodiak area? Cook Inlet fishermen say they do. Chignik fishermen say some of those fish are theirs. But Kodiak fishermen have been fishing the same way for over a hundred years. These issues were decided 30 or 40 years ago!

The Alaska Constitution settled this question. That document provides that fish are reserved to the people for common use. It's called the "common property" clause. Also, the Constitution provides for no exclusive right of fishery. So, the fish everywhere belong to everyone, not to one particular group who may reside close to where salmon spawn.

The Alaska Legislature has directed that you, the Board of Fisheries, decide who gets to catch the fish based on the statutory allocation criteria. First among these is history. In the case of Kodiak and Cook Inlet, both areas have a long history of taking sockeye salmon, over 125 years. Cook Inlet does not deserve a preference based on this criterion.

Other important criteria include state and local economies. It would be difficult to justify a new preference for Cook Inlet over Kodiak based on economics and the economy of a village like Ouzinkie. Commercial sockeye fishing in both areas is important to local and state economies, but the Kodiak salmon fishery, which harvests primarily pinks and which would be greatly disrupted by attempts to limit bycatch of sockeye, is much larger than the Cook Inlet fishery.

Other allocation criteria relate to taking fish for food or recreation. Again, both areas have robust food and recreational fisheries, and finding that one area deserves a new preference would be destructive to the balance that has evolved over decades. I do want to thank the board for the exclusive subsistence area you created in the Ouzinkie harbor. This is a fishery I participate in every year to help feed the community.

No drastic changes are warranted in the Kodiak fishery at this time based on the board's allocation criteria, and based on the constitutional principle of common property. I urge the Board to retain the status quo. Vote NO on proposals 37,58,59,60,61,62,63,64,65 & 66.

Sincerely yours,

Gary Boskofsky



Gene Anderson
Box 47
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Oppose Proposals 58,59,60,61,62,63,64,37.65.66

Board Members:

I'm a retired salmon fisherman from Ouzinkie. I've lived and fished my whole life in Ouzinkie. Salmon fishing is what Ouzinkie was built on. We all grew up fishing and working to get our own boat. That's why I get angry when I see these proposals from Cook Inlet and Chignik. I fought over the Cape Igvak plan and the North Shelikof plan all those years ago. We reached a compromise both sides could live with. Now, even though I'm retired, they are still coming back to take away the Kodiak salmon fishery from Ouzinkie fishermen. It's not right that they can just keep coming back and asking for more, more more!

Look at proposal 66. If the Board wanted, for whatever reason, to move several thousand sockeye salmon out of the Kodiak salmon fishery and into the Cook Inlet fishery, where would you start? Proposal 66 just start blindly guts the Kodiak local stocks oriented. There are no "hot spots" where Cook Inlet fish tend to concentrate year after year in the Kodiak area. What little directed effort did occur at Cook Inlet stocks in Kodiak ended 30 years ago, but UCIDA still uses one incident from 1988 to try to persuade you that there is a problem that needs fixing.

How will you be assured that sockeye saved from one part of Kodiak won't be caught further north or west or east or south but still in the Kodiak area? How will you ever measure the success of such blind stabs in the dark? You would need to close all fishing in Kodiak to be sure of a savings! How will you know the fish you allegedly saved will show up in Cook Inlet? The predators still need to be fed, and many salmon won't survive the gauntlet of sea lions, orcas and legions of seals.

I just don't see why the Board would create havoc in the Kodiak local stocks fishery in order to provide more escapement or more catch in Cook Inlet? Will you even be able to measure the difference? What are the economic tradeoffs? You would be taking several million dollars out of the Kodiak fishery to boost UCIDA's catch by a few thousand sockeye? What does your allocation criteria say about that? The gains realized by Cook Inlet fishermen could not possibly offset the economic devastation in Kodiak. The balance weighs heavily in favor of continuing Kodiak's current management plans.

Thank you for your time.

Gene Anderson



December 27, 2019
Grace Allen
PO Box 1907
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: **Oppose Proposal 58-62**

To the Board of Fisheries

I'm writing in **opposition to proposals 58-62**. I am a 27 year-old commercial fisherman with a decade of experience fishing around Kodiak island. I'm planning to invest in Alaska's salmon industry by buying my father's boat and continuing in his footsteps as a skipper of a Kodiak seiner. However, I have reservations regarding the future of the Kodiak salmon industry especially in the face of these proposals, and want have confidence in the management of our fishery before I invest my future.

As a crewmember on a Kodiak seiner Igvak is my favorite area to fish. The money I have made from fishing in Igvak is what will help me buy my salmon permit and further invest in our community. There are already many obstacles facing young fishermen entering the salmon industry. As recent years have shown, the salmon runs around Kodiak have become more unreliable, as rivers remain dry all summer the future of our salmon runs are uncertain. If Igvak is further restricted from the Kodiak seine fleet I am concerned that it will make it even harder for a young fishermen like myself to get a foothold in the industry.

Please oppose these proposals and help me and other young Kodiak fishermen be confident in the future of our fishery.

Thank you,
Grace Allan, FV Orion



RE: Comment on multiple proposals

Salutations Chairman Morisky and Board of Fisheries Members, My name is Henry Orth V, and I was born in Port Lions, a small village situated by the sea, on Kodiak Island. The son, grandson, and nephew of Kodiak and Afognak commercial fishers it's safe to say that salmon and the sea are deeply engrained in my DNA. A life of commercial fishing has instilled in me a sense of adventure, hard work, persistence, and respect for the sea. The aforementioned being values I hope to pass on to my young son. However, the proposed amendments to the Kodiak Commercial Salmon season (# 37 and 58-65) threaten the historical, economic, and cultural significance of Kodiak's storied salmon fishery. This being said I urge you to vote NO on proposals (#37, and 58-65) Much like the salmon that provide us our livelihood, the bounty of the bays, capes, and rivers of the Kodiak Statistical salmon area is one of cycles. No two seasons are the same, nor are two statistical salmon areas the same. Two lackluster seasons in Chignik, are from reason enough to limit and/or restrict openings in the Cape Igvak area. Fishing openers in the Cape Igvak section of the Mainland District are already dictated by Chignik catch/escapment, and to employ any further restrictions to Kodiak fisherman in June is highly detrimental to the economic prosperity of our Kodiak Fisherman. The vocal minority will always rise above the silent majority. With that said, too long have Kodiak Fisherman suffered at the expense of keeping Chignik fishers appeased and amiable. Additionally, restricting Westside Kodiak/Afognak openers to "protect" Cook Inlet sockeye returns is an incredibly asinine and erroneous proposal. Salmon by nature travel thousands of miles to return to spawn, however they don't always travel the same SEA-nic highway each year, nor do they follow a strict schedule. Cook Inlet reds have been caught as far south as Sitkinak as well as along the entire Western Shore of Kodiak, and Afognak anytime from late June - late July. Yet, they still seem to return to the Kenai in record numbers. Kodiak Fisherman intercepting these Cook Inlet bound fish is always a shot in the dark, and restricting Westside fishing time as the Pink Management plan starts (July 6th) would be deeply detrimental to Kodiak seiners and Gillnetters. Thank you for your time, and I implore you to vote NO on proposals (37, and 58-65) in order to protect the future of Kodiak's salmon fishery.

Henry Orth V Kodiak Salmon Seine Permit Holder



Herman Andrewvitch
P.O. 83
Old Harbor, AK 99615

December 18, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Vote NO: Proposals 58, 59, 60, 61, 62, 63, 64, 37, 65, 66

Dear Alaska Board of Fisheries:

I started fishing on Old Harbor salmon vessels back in 1994. I've done salmon fishing on one or more local vessels every summer since then. Fishing is about the only job in Old Harbor. Old Harbor has a good size local fleet but there use to be lots more fishing opportunities - herring, tanner crab, cod,. Now it's just salmon. I hope you will keep Kodiak's salmon fishery the way it has been over the past 25 years --- it's all we have left! These proposals from Chignik and Cook Inlet will directly reduce my crew share allot. I ask you to vote NO on these proposals.

When you live in the village, it's hard to understand how people outside of the village can take away something like fishing. One of the Cook Inlet proposals looks to me like it would just shut down the seine fishery with the cape to cape closures. One of the main reasons to fish on the capes is to catch bright fish before they spawn. If you eliminate cape fishing for most of July, I think it's likely we'll be harvesting lots of black humpies.

My skipper has been fishing on Kodiak Island for more than 50 years. He has seen lots of things come and go. Over that entire time fishing in Kodiak, he has tried to find Cook Inlet sockeye in the Kodiak area. He tells me that sometimes Cook Inlet fish are here but most years they don't really show up in big numbers. From what he says, I don't think Kodiak is having that big of an impact on Cook Inlet. Normally, when we catch a few fish here, they are having a big run in the Inlet.

We fish at Cape Igvak if it is open. It sure seems like we're restricted allot over there. I don't understand why Chignik wants even more regulations. Many times, when we go over to Cape Igvak, the fish are already passed. Cape Igvak, just like the presence of Cook Inlet fish is a hit and miss fishery. Making closures creates the same restrictions every year but we know fish don't run the same way. That's why you need to oppose proposals 58, 59, 60, 61, 61, 63, 64, 37, 65&66.

Sincerely yours,

Herman Andrewvitch



RE: PROPOSALS 58, 59, 61-66, 37

Over the last 40 years the Kodiak area has been the most flexible place in the state with helping to protect other areas fishing. From the original Igvak compromise to the seaward zone closures on the northwest side we have given up fishing space and time. We have reached a point where others have put forward proposals such as this one that will irreparably harm Kodiaks ability to harvest salmon in our district! The board needs to step forward and reject these self interested proposals aimed at further choking Kodiak salmon fishermen from making a living.



James Skonberg
Box
Ouzinkie, AK 99644

December 26, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Vote NO Proposals 37,58,59,60,61,62, 63,64,65,66

Dear Board of Fisheries Members:

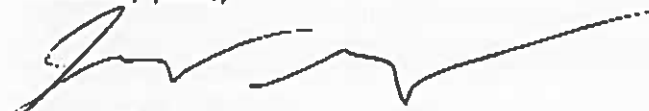
I am a long time Kodiak area salmon fisherman and I live in Ouzinkie. I grew up in Chignik and fished there before I moved to Ouzinkie in the 60's. My fishing career has spanned the history of the Cape Igvak fishery. I remember when we were allowed to fish at Cape Igvak whenever Chignik was open. I also remember when the Department of Fish and Game came up with the Cape Igvak management plan. Kodiak fishermen, like me, felt we had lost something when the original Cape Igvak plan was put in place. We would rather have fishing time than a percentage.

Now I see the Cape Igvak management plan differently. I see that my nephews and other relatives in Chignik are able to catch enough fish to pay most of their expenses before Kodiak can fish at Cape Igvak. In a season like last year or the disaster in 2018, Kodiak didn't fish at Cape Igvak because of the poor early Chignik run. I see this as the Cape Igvak management plan working --- saving the resource and helping out Chignik fishermen with an economic guarantee. That's why I think you should vote NO on proposals 58, 59, 60, 61 and 62. The plan is balanced and Chignik and Kodiak fishermen need to work together rather than fighting about Cape Igvak every three years.

I've also fished through the whole controversy regarding Cook Inlet origin sockeye in the Kodiak Area. Ouzinkie fishermen have known about the occasional presence of Cook Inlet fish since I started fishing. The trouble is that they don't show up every year and don't seem to hit in the same spot. Creating the North Shelikof Management Plan hurt my fishing. I had fished up around North Afognak for many years. Fortunately, Ouzinkie fishermen were able to have the Board modify the S.W. section of the North Shelikof management plan to allow us to fish "one set out" in that area which really helped the Ouzinkie fleet. All this is to say that I don't know how you regulate Kodiak more for when Cook Inlet fish may or may not appear. It just doesn't make sense. The harm to Kodiak and Ouzinkie would hurt far more than the benefit to Cook Inlet. I say vote NO on proposals 63,64,65 & 66.

I just want to say one thing regarding proposal 37. It looks like the tail wagging the dog. Yes we have concerns about Chinook salmon. But the solution is not some universal scheme that creates lots of hardship without a known benefit. Vote NO on proposal 37 (and RC 9)!

Sincerely yours,



James Skonberg



DATE: December 27, 2019

RE: Opposition to proposals 58-66 and 37

Chairman Morisky and members of the Board of Fisheries,

Thank you for the opportunity to comment on these proposals in advance of the Board meeting for Kodiak. I respectfully requests you oppose proposals 63, 64, 65, 37 and 66 as they present unjustified changes to a successful conservation tool and a very complex management plan for the Kodiak Management Area (KMA) salmon fishery.

I have participated in the set net fishery on the west side of Kodiak Island since 1979. Over the years as my family grew, my children and I built up our family operation. Today all three of my children and their families –including 3 grandchildren participate in the fishery. Set netting on Kodiak’s west side is a family based and historic fishery. We have had our good and bad seasons over the past 40 years. We have heard about the phenomenal catches of the Chignik and Cook Inlet fishermen as we plodded along with our mediocre catches in comparison we never blamed our low catches on others management areas.

Kodiak’s salmon fishery has not changed since management plans were adopted starting with the Cape Igvak management Plan in 1978 and continuing through the early 1990’s. Forty years ago and one year before I first entered the fishery. There is no ‘new and expanding’ fishery in Kodiak.

Yet here we are once again at a regular 3-year cycle of the Alaska Board of Fisheries in a defensive position regarding incidental catch of salmon bound for Cook Inlet and Chignik. These proposals have been brought forth by the same Cook Inlet fishing groups of years past. The results of this repetitive attack on the KMA harvest strategy are many. Firstly, it effectively deprives Kodiak fishermen from addressing their own issues, as we are put in the position once again of defending the KMA in regards to incidental catch of Cook Inlet salmon. As long as salmon have been harvested in Kodiak, Cook Inlet bound salmon have been harvested incidentally. This incidental harvest will continue as long as there is a commercial salmon fishery in Kodiak. The much referenced 2014-16 Kodiak sockeye genetic stock identification study does not provide any new information but simply provides more data to previous stock assessments developed in the 1990’.



My family fish exclusively in the Central Section of the Kodiak Management Area. We fish alongside Kodiak seiners in the Central Section, a combined gear group area. The Central Section of the Northwest District is the only area of Kodiak Island that combines both gear groups. All other Kodiak areas are seine only. Set netters in the Central Section work in a highly competitive and crowded area. Every one of the proposals put forth by Cook Inlet groups or individuals, if adopted, will severely increase the seine effort in an already congested mixed gear group area. The set netters in the Central Section will be the greatest losers if any of these misguided restrictions are mistakenly adopted.

My family is busy harvesting local Kodiak stocks of pink, chum and local sockeye salmon during the time periods that Cook Inlet groups and individuals are proposing restricting our fishing times and historical fishing locations. Any change or reduction in our set net opportunity, along with increased seine pressure in our only area, during these significant time periods, will result in our fishery being compromised.

Our fishery and gear group of set netting has not changed since its inception. Every BOF cycle we look at Cook Inlet groups proposing extreme restrictions to our fishing time and opportunities which are already limited by our very congested and competitive area.

Remember the KMA is a very complex area and is tightly managed for Kodiak's own local stocks. There are hundreds of salmon streams on the Island of Kodiak as well as roughly a dozen sockeye systems that have run timings that span over 4 months during the summer. Trying to manage our own local stocks and at the same time trying to manage for non-local stock incidental harvest would create many problems. Kodiak fishermen are already sharing the conservation burden with the North Shelikof Management Plan that was agreed upon and adopted years ago.

When looking at the Board's allocation criteria, there is not anything historically, biologically, scientifically, environmentally or sociologically that would justify the Board making changes to Kodiak's management Plan. I ask you to follow your mandate and reject proposals 58-66 and 37 and protect Kodiak's Management Plan and my grandchildren's future in the Kodiak salmon fishery.

Sincerely,

Jane Petrich, Kodiak



December 27, 2019

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

RE: Opposition to proposals 63, 64, 65, 37, and 66

Dear Chairman Morisky and Board Members,

Thank you for the opportunity to provide written comment on these proposals. My family and I are setnetters in Uyak Bay which is in the Central Section of the Northwest Kodiak District. We live in a cabin near our fishing locations during the summer months. The setnet fleet in this area make up a large part of the local community. As a group, northwest setnetters are restricted to fishing only in the Central Section of the Northwest Kodiak District and may not move to other fishing areas on the island if we are experiencing unfavorable water conditions, closures or poor fishing.

The Central Section is a combined gear group area. All of these proposals would increase the seine effort in the Central Section, in turn, creating even more competition for fish in an already crowded area. The setnet fleet will endure heavy sacrifices if any of these proposals are approved.

In addition, approval of these proposals will increase the complexity of an already complicated management plan; putting our local stocks in jeopardy of over-escapement.

I respectfully ask that the board reject proposals 63, 64, 65, 37, and 66.

Respectfully,

Jeff Bassett
Northwest Setnetter



December 27, 2019

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

RE: Approval of Proposal 67, 70 and 71

Dear Chairman Morisky and Board Members,

Thank you for the opportunity to provide written comment on these proposals. My family and I are setnetters in Uyak Bay which is in the Central Section of the Northwest Kodiak District. We live in a cabin near our fishing locations during the summer months. The setnet fleet in this area make up a large part of the local community. As a group, northwest setnetters are restricted to fishing only in the Central Section of the Northwest Kodiak District and may not move to other fishing areas on the island if we are experiencing unfavorable water conditions, closures or poor fishing.

Approval of proposal 67

The rate of slime events has increased over the last several years. These events at times create such poor conditions that we simply do not catch fish because our nets are covered in slime. Clean nets are very important in a gillnet fishery as the fish must penetrate our web to be caught. If fish see the net they simply turn the other way. Our only defense is to spray our nets with a pressure washer, which is only a temporary solution. In an ever-increasingly competitive fishery, proposal 67 has the potential to provide some relief for the Kodiak setnet fishery.

Approval of proposal 70

Proposal 70 is a sustainable addition to the Karluk River Management Plan, in that it will provide a mechanism for limiting over-escapement of pink salmon into the Karluk system. It will also provide all salmon fishermen, on the west side, an opportunity to harvest pink salmon bound for the Karluk while traveling through the Central section.

Approval of proposal 71

Approval of proposal 71 helps to insure a long-term viable fishery for fishermen of both gear groups. It is to the benefit of all fishermen to allow for interim pink salmon escapement goals to be achieved before opening the inner bays. It makes sense to secure early run escapement to provide for a well-balanced return.

The setnet fleet is restricted from these inner bay areas. As a result, the outcome of inner bay openings is generally detrimental to the setnet fishery.

Thank you for your consideration on the above proposals.

Respectfully,

Jeff Bassett
Northwest Setnetter



Joe Delgado
Box 1225 Selief Lane
Kodiak, AK 99615

December 26, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Vote NO Proposals 37,63,64,65,66

Dear Chairman and Board of Fisheries Members:

I have lived in Ouzinkie most of my life and I'm currently a board member of the Ouzinkie Native Corporation. I fished for salmon out of Ouzinkie and I've worked hard to better the community. Salmon fishing is very important for the survival of Ouzinkie. Incremental regulation changes that reduce the fishing opportunities for residents of Ouzinkie will have a negative impact. We're already struggling to keep enough families in Ouzinkie to keep the school open. Changes in salmon fishing income could be the nudge that forces just one or two families to leave – that would force a school closure. It's easy to get caught up in the "big picture" and think in terms of "policy" but the reality is that changes you may initiate could create unintended consequences for Ouzinkie and Kodiak's other rural communities.

I've followed some these fishing issues for several years. One of the things that makes no sense is talking about protecting Susitna sockeye stocks here in Kodiak. Anyone that lives in the area knows the primary problem is Norther Pike. If you want more sockeye in the Susitna drainage, get rid of the pike. Some of my friends from the Knik tribe have said that some of the rivers up there are completely without sockeye due to the Norther Pike. I think most of the problems with salmon in Cook Inlet can and should be solved in the Cook Inlet management areas.

I've seen the sockeye genetic study done in Kodiak from 2014-16. I don't know what people were surprised about. The Department has said for a long time that Cook Inlet fish could make up as much as 15% of Kodiak's total sockeye run. I know from experience that it's hard to find Cook Inlet fish in the Kodiak area during many seasons. I see the results from 2014 in the genetic study as showing what happens here in Kodiak most years. The 2015 and 2016 information is more about what happens when Cook Inlet has larger than average runs and when the ocean temperatures are higher. I don't see that there is any "new" information in this study that should concern the Board. Vote NO on proposals 65 and 66.

Proposal 63 is another Cook Inlet sponsored proposal to restrict a Kodiak fishery. The proposal would reduce time and area in the Kodiak purse seine fishery, particularly in the Mainland District in order to catch fewer chinook. The proposer's justification is that current Kodiak salmon management plans do not give enough protection to Cook Inlet chinook stocks. Ouzinkie Native Corporation has worked a long time to reduce Chinook salmon bycatch in the Kodiak trawl fisheries. We've found out that less than 5% of the chinook taken by all gear types in the Gulf of Alaska are likely local stocks. In other words, large closures in time and area are not likely to have much impact on Cook Inlet Chinook stocks. Vote NO on 63 and 37.

Sincerely yours,

Joe Delgado



RE: Comment on multiple proposals

I have been gill netting salmon in the Kodiak Management Area for 40 years. The incidental catch of Cook Inlet bound sockeye in the KMA has been an issue through most of my career set netting. In 1995, there was a huge effort by fishermen and managers to lay this issue to rest. A lot of work went into the North Shelikof Plan. Years since, we, KMA, have still been under attack, to the point of the Cook Inlet fishermen want to write the KMA Plan for us. When will this madness end?



100 E. Marine Way STE 300 Kodiak, Alaska 99615 • (907) 486-5557 • Fax: (907) 486-7605

26 December 2019

Dear Chairman Morisky and Board members,

Kodiak's Chamber of Commerce is the voice for the business community in Kodiak. We have approximately 260 members which include fishermen, processors, support services and fishery supply vendors. Fisheries are the economic driver for Kodiak, as it's third in the nation for volume of commercial landings in 2017; it must be preserved. Right now the Kodiak economy is under threat: In 2020 the Federal Pacific cod fisheries will not open; pollock quotas are down 20%; halibut harvests are also down and projections indicate continued decline; the herring fishery is severely depleted; and tanner crab has an extremely low guideline harvest level. Now, Board of Fisheries proposals from Cook Inlet and Chignik regions are attempting to reduce the economic returns from Kodiak's salmon fishery. We need to protect our economy and request that you vote NO on proposals which could severely impact Kodiak's salmon fisheries (proposals 58,59,60,61,62,63,64,37,65 and 66).

The Kodiak Island Borough (KIB) and the City of Kodiak commissioned a study looking at the Economic Impact of the Seafood Industry on the KIB¹. Although the study is a bit dated, it does demonstrate the economic engine that drives Kodiak and the importance of the salmon industry. The study is considered by the Kodiak Chamber Board to still be extremely relevant. This study used the 2014 fishing year as a "snap-shot". Several important points can be drawn from this study about Kodiak's seafood industry in general and the importance of the salmon fishery in particular:

- The commercial salmon fishery is caught by seine and set gillnets and provides harvest opportunity for hundreds of small businesses throughout the Kodiak Archipelago.
- The salmon fishery contributed the highest value paid to harvesters of any fishery in 2014.
- For every million pounds of salmon landed and processed in the KIB, \$900,000 in total labor income is created in the KIB economy, including all direct, indirect, and induced effects.
- For every million dollars paid to fishermen for salmon landed in the KIB, a total of \$1.22 million in labor income is created in the KIB, including all harvest and processing related multiplier effects.
- 28% of the total dollars paid to fishermen were paid to KIB resident salmon permit holders.
- Seafood industry related jobs in the KIB indicates that the industry accounted for 38 percent of all Kodiak area employment.
- Employment in the processing plants is dominated by salmon deliveries from June until September.
- Kodiak's seafood processors employ the highest percentage of local residents of any major production region in Alaska due to the year-round nature of our fisheries.
- The community of Kodiak has made substantial investment in seafood industry-related infrastructure – public utilities, transportation connections, and maritime infrastructure. A healthy seafood industry is critical to the community's ability to pay for these investments.

Adopting proposals 65 or 66 is expected to have an adverse impact on Kodiak's economy. Based on internal research, the Kodiak Salmon Workgroup suggests that if proposals 65 and 66 were adopted, loss salmon revenue paid to Kodiak fishermen could exceed, on average, \$5,000,000 annually. When the economic multiplier of dollars that circulate within the community is applied, that loss is compounded.

¹ Economic Impact of the Seafood Industry on the Kodiak Island Borough, prepared for the Kodiak Island Borough and City of Kodiak, prepared by McDowell Group, May 2016.



100 E. Marine Way STE 300 Kodiak, Alaska 99615 • (907) 486-5557 • Fax: (907) 486-7605

Regarding the Cape Igvak Management Plan, the Chamber does not perceive a need for a change. The plan provides a biological and economic safety net for the Chignik fishery through restrictive harvest opportunities for Kodiak permit holders based on Chignik escapements. During 3 of the past 5 years, when Chignik runs were limited, Kodiak fishermen did not fish at Cape Igvak. Kodiak fishermen have participated in this fishery for as long as the State of Alaska has managed the fisheries. The compromise reached by the Board 40 years ago is fair and working so should not be changed.

The history of the fishery, the fishery's economic importance to the region, and alternative fishery resources are all part of the Board's allocation criteria when considering salmon management changes. The Kodiak Chamber of Commerce believes that when the Board applies each of these standards as well as the remaining allocation criteria, your decision tips in Kodiak's favor. We believe the board should vote no on proposals 58,59,60,61,62,63,64,37,65 & 66.

Yours in economic prosperity,

Sarah Phillips
Executive Director
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December 19, 2019

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

Submitted via Online Comments

Re: **Opposition to Proposals 58-66 and 37**

Dear Chairman Morisky:

The Kodiak Island Borough (Borough) opposes Proposals 58-66 and 37, which will be considered at the upcoming January, 2020 Alaska Board of Fisheries (Board) meeting in Kodiak. The Borough encompasses the Kodiak Management Area as defined by the Alaska Department of Fish and Game, and includes the Kodiak Archipelago and the Alaska Peninsula from Cape Douglas west to Cape Igvak. Commercial fishing in State and Federal waters around Kodiak is a major economic driver for the Borough, and fisheries tax revenues comprise a significant portion of the Borough's revenues on an annual basis.

Proposals 58-66 and 37 would have substantial negative effects on Kodiak's economy and salmon fisheries, and this set of proposals simply reiterates the same arguments the Board has already addressed during each board cycle for the past 30 years. Namely, Chignik wants to change history and take away the Cape Igvak fishery and Cook Inlet wants to exert control over common property fish hundreds of miles away from Cook Inlet. Kodiak Island Borough strongly recommends that the Board maintain status quo in regard to both the Cape Igvak and Cook Inlet issues.

Cape Igvak Fishery. It is critical for the Board to consider the long history and context of Kodiak salmon fishing in the Cape Igvak area, and to maintain consistency with past management decisions and strategies. The Alaska Board of Fisheries recognizes this importance of historical use by listing "the history of each personal use, sport and commercial fishery" as the first of its Allocation Criteria.



Kodiak fishermen have been fishing throughout the Alaska Peninsula, including Chignik and area M, since even before the Limited Entry management system was implemented in the early 1970s. After limited entry Kodiak fishermen continued to fish on the Alaska Peninsula from Cape Douglas to Cape Igvak.



When Chignik fishermen became concerned that Kodiak's continued activity at Cape Igvak was impacting their fishery Kodiak and Chignik stakeholders met in Juneau at the 1977 Alaska Board of Fisheries meeting and hammered out the current Cape Igvak Management Plan. The plan balanced Kodiak's historical Cape Igvak fishery with Chignik's need to have economic and conservation protections. Consequently, the plan prohibits fishing at Cape Igvak until the Chignik fleet catches a minimum of 300,000 sockeye – about \$2.5 million dollars in value. After the Cape Igvak fishery is opened to Kodiak fishermen, Kodiak is limited to 15% of the total Chignik run, which approximates prior catch percentages.

The Cape Igvak plan is balanced and fair and has endured with only one minor adjustment for 42 years because it balances protections for Chignik's fishery on one side with recognition of Kodiak's historical participation on the other. The Kodiak Island Borough does not see any "new information," new "best available science," any new and expanding fishery or any new conservation concerns that would justify changing the Cape Igvak fishery. The six Cape Igvak proposals (58-62 and 65) represent an attempted "fish grab" without justification, and seem to evidence a misplaced hope that the Board will ignore the history of the Cape Igvak fishery and the balance of the equities established by the Cape Igvak management plan in 1977.

Cook Inlet. Kodiak salmon fishermen have recognized the presence of what appear to be "non local" stocks in the Kodiak area for over 100 years, although it has always been impossible to predict when, where or if non-local fish will show up in any given season. In 1989, during an unusually calm summer Kodiak salmon fishermen found Cook Inlet bound sockeye out in the middle of the northern Shelikof Straits and concentrated fishing effort in that area.

In 1990 Alaska Board of Fisheries clarified that (1) the Kodiak fleet, unlike the Cook Inlet drift fishery, was limited to fishing inside the 3 nautical miles "state waters" line, and (2) that the activity in the North Shelikof constituted a "new and expanding" fishery. The Board then crafted the North Shelikof Management Plan which balanced continuation of the historical Kodiak fishery of local Kodiak stocks with a conservation zone to protect Cook Inlet bound sockeye that might be in the area. The North Shelikof Management Plan has endured for the past 29 years, with a single minor adjustment for expanded local stocks opportunities in the S.W. Afognak section.

The Borough is aware of the genetic sockeye identification study undertaken in the Kodiak Management Area from 2014-16. The study merely confirmed what was already known about the presence of Cook Inlet sockeye in the Kodiak area, and demonstrated amounts vary greatly from



year to year. In 2014 only a few fish are available; in 2015 larger concentrations appear in some areas but not in others and in 2016 there are "lighting strikes" at some places but not in the same places that fish appeared in 2015. Finally, across all three years the amount of Cook Inlet Sockeye captured in the Kodiak Management Area was within the amounts suggested by the Alaska Department of Fish and Game during the early 1990s. The 2014-16 genetic study is a new study but it does not provide new information relative to the presence of Cook Inlet sockeye in the Kodiak Management area. In short, there is no basis for additional restrictions on Kodiak's salmon management for local stocks because the presence of Cook Inlet sockeye in the Kodiak Management Area has already been accounted for in current management.

Allocation decisions are understandably difficult for the Alaska Board of Fisheries. However, in this case the Cape Igvak and Cook Inlet fisheries each have a long standing allocation plan that was reviewed by multiple Alaska Boards of Fisheries and there is no indication of new fishing patterns or significant new information. There is no need or imperative to change Kodiak's salmon management plans and the Board should maintain the current plans already in place.

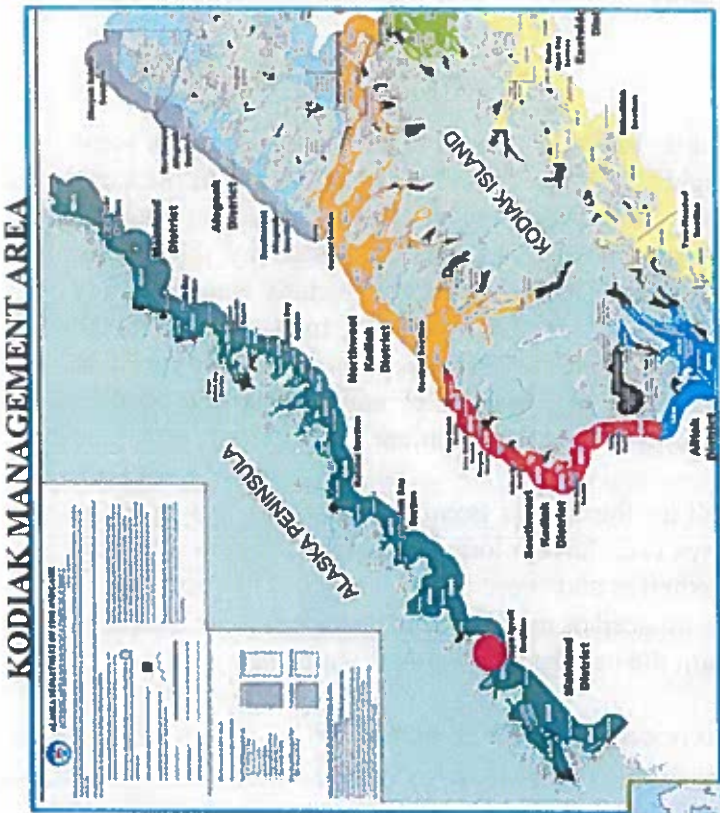
Kodiak Island Borough encourages the Board to reject proposals 58-66 and 37.

Very truly yours,

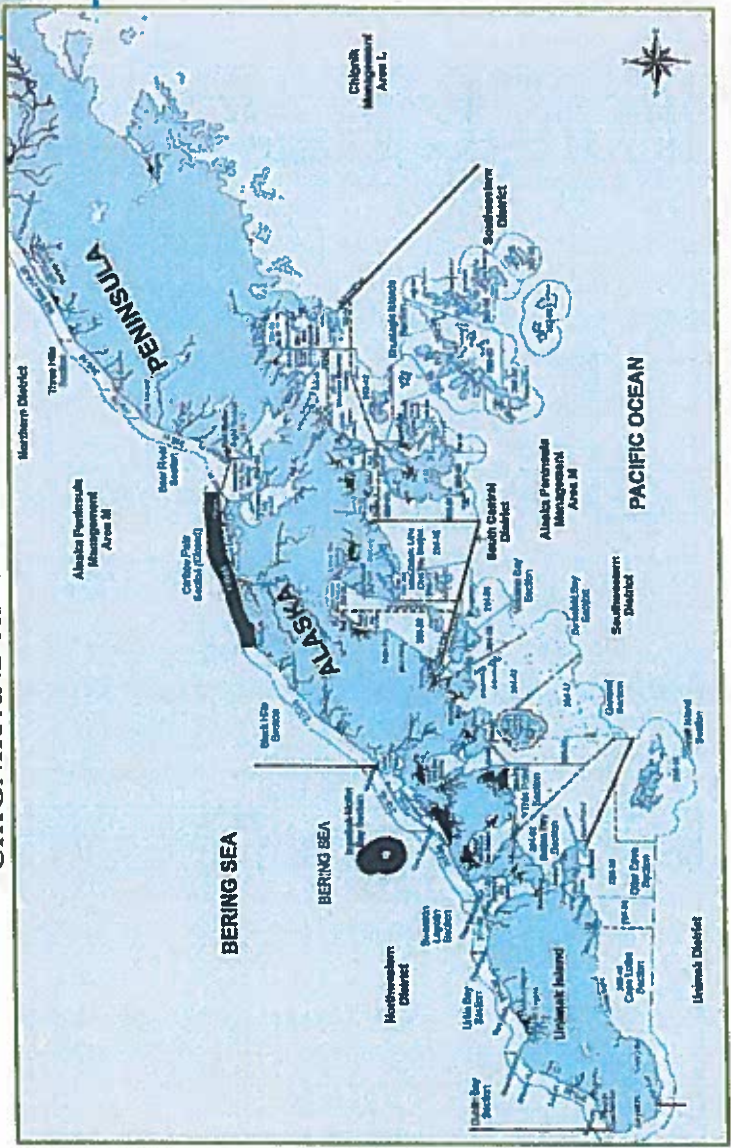
A handwritten signature in blue ink, reading "Bill Roberts", with a long horizontal flourish extending to the right.

Bill Roberts, Borough Mayor

● - Cap Igvak marked with red dot on Kodiak Management Area Map



CHIGNIK AND AREA M



ALASKA COMMERCIAL FISHERIES

Salmon Management Activities

A listing of the major Alaska salmon fisheries

NORTON & KOTZEBUE SOUNDS

CHUM SALMON

Principal River Systems:
Kobuk, Nontak, Kwiniuk,
and Unalakleet Rivers

YUKON & KUSKOKWIM RIVERS

CHUM & CHINOOK SALMON
Gear: Gillnet

BRISTOL BAY

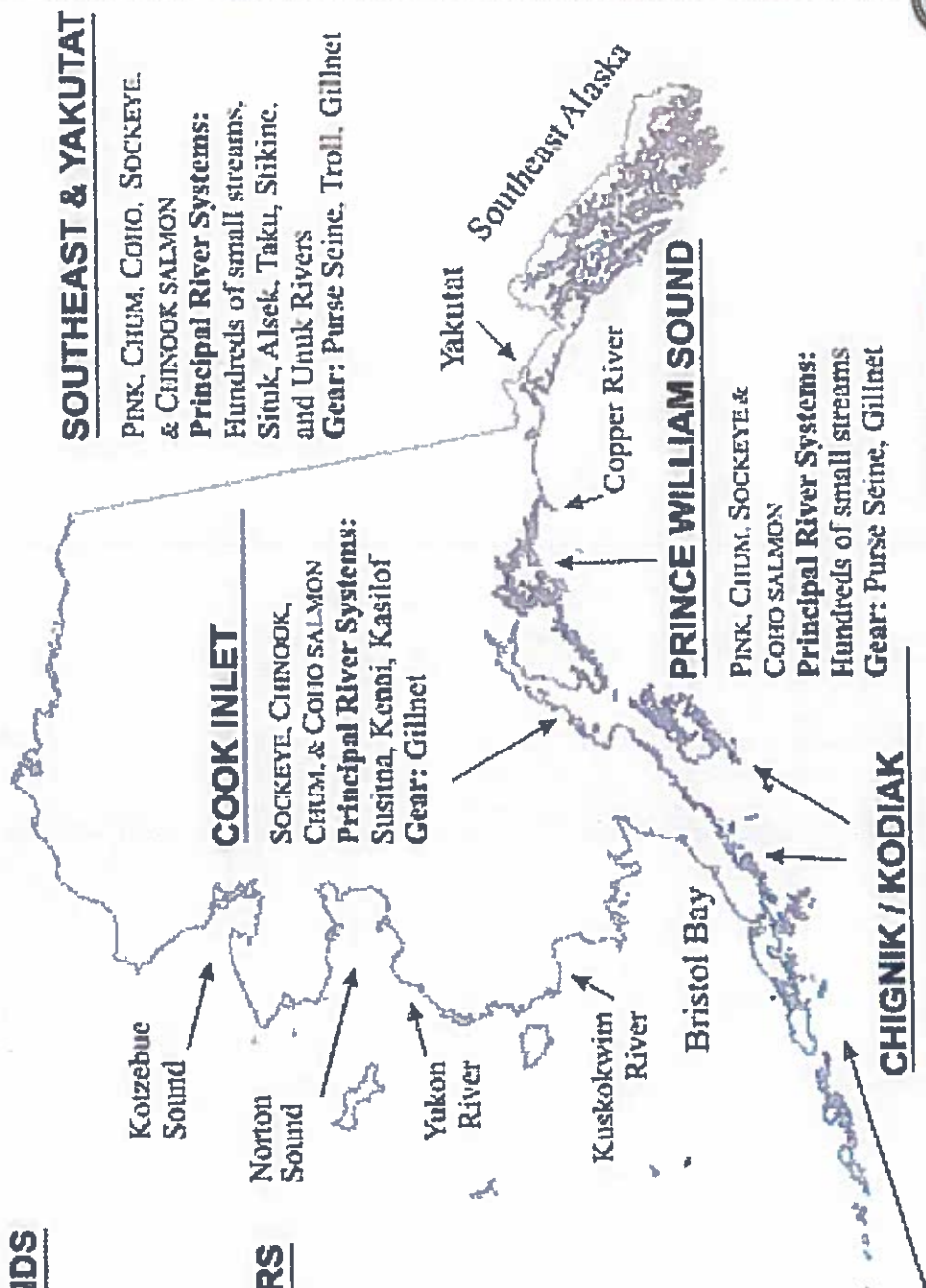
SOCKEYE, COHO, CHUM,
CHINOOK SALMON

Principal River Systems:
Kvichak, Alagank, Naknek, Eggik,
Ugashik, Wood, Igushik, Nushagak,
Mulchatna, and Togiak Rivers
Gear: Gillnet

ALASKA PENINSULA

SOCKEYE & PINK SALMON

Principal River Systems:
Metik, Inik, Sandy, Bear, Nelson
Gear: Purse Seine, Gillnet



COOK INLET

SOCKEYE, CHINOOK,
CHUM, & COHO SALMON
Principal River Systems:
Susitna, Kenai, Kaslof
Gear: Gillnet

PRINCE WILLIAM SOUND

PINK, CHUM, SOCKEYE &
COHO SALMON
Principal River Systems:
Hundreds of small streams
Gear: Purse Seine, Gillnet

CHIGNIK / KODIAK

SOCKEYE & PINK SALMON
Principal River Systems:
Chignik, Buskin, Pasagshak, Karluk,
and Ayakulik Rivers
Gear: Purse Seine, Gillnet

COPPER RIVER

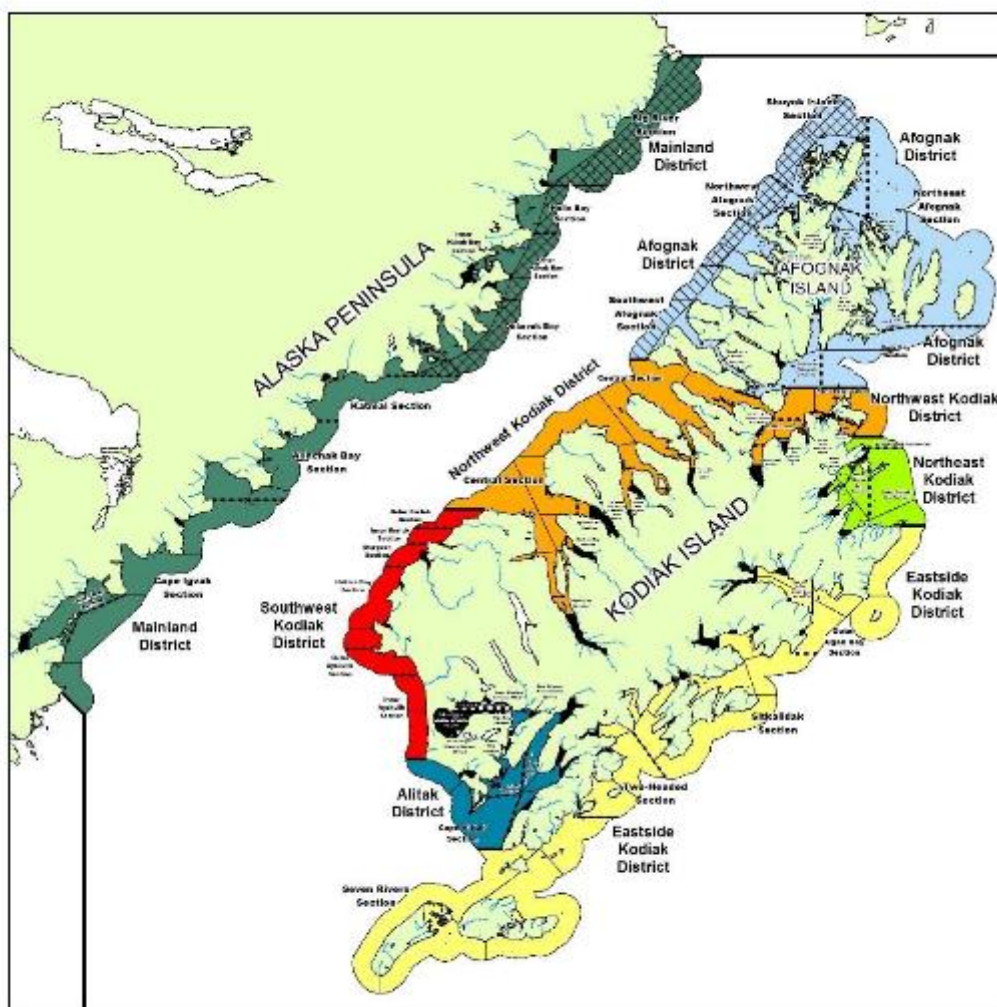
SOCKEYE & CHINOOK SALMON
Gear: Gillnet

SOUTHEAST & YAKUTAT

PINK, CHUM, COHO, SOCKEYE,
& CHINOOK SALMON
Principal River Systems:
Hundreds of small streams,
Situk, Alsek, Taku, Stikine,
and Unuk Rivers
Gear: Purse Seine, Troll, Gillnet



2019-2020 Board of Fish || Kodiak Finfish || Cumulative Effects



Economic Analysis of the Cumulative Impacts from Proposals 58 and 64.

Kodiak Salmon Workgroup



Summary:

The cumulative effects of all Cape Igvak proposals would close the fishery entirely before July 25th in all years (proposals 58 and 64). There would be additional restrictions due to the harvest minimums in Chignik area being raised to 600,000 (proposal 61). Assuming these closures, the reduction of Cape Igvak harvest to 5% of total Chignik sockeye count (proposal 60) would result in no additional limits on Cape Igvak harvests.

Cape Igvak Cumulative Direct Losses

On average, the cumulative effects of Cape Igvak Proposals 58, 60, 61, and 65, will result in more than 95% reduction of the current catch. Overall, these changes would result in an economic loss to the Borough of almost 3.23 million dollars a year.

Direct revenue lost to the Kodiak Borough per year:

\$2.15 Million Dollars	Direct loss per affected year:	\$2.15 Million
Yearly Direct Loss to	Loss from sockeye fishery:	\$1.77 Million
Fishermen	Fisheries employment impact:	19 jobs per year
	All employment impact:	23.8 jobs per year
	Indirect community loss:	\$446,401
	Induced community loss:	\$628,960
\$3.23 Million Dollars	Total Annual Borough Loss:	\$3,225,653
Annual Economic Loss		
in the Kodiak Borough		

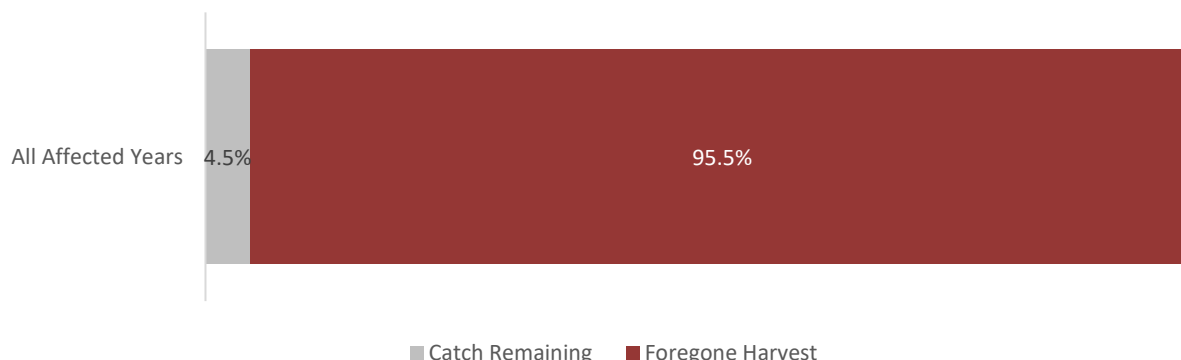
The cumulative effects of the Cape Igvak proposals would have impacts throughout the Kodiak Borough. The direct loss to fishermen would be \$2.15 million per year. Of the total loss to the fishery, the limitations on the sockeye fishery comprise the majority of the impact, accounting for \$1.77 million of the loss with \$380,000 of the total loss distributed among other salmon species.

The direct impact of this proposal will result in a loss of 19 fisheries specific jobs and a total of 23.8 jobs overall in the Kodiak Borough per year. In addition to the direct loss impact of \$2.15 million, there is a further indirect loss of \$446k as a result of lost business to business economic activity for the community from purchases such as fuel, gear, and supplies. There is an additional \$629k of induced loss in the community resulting from the lost direct and indirect economic activity (total \$2.60 million) and reduced labor market. This impact results in a total loss to the community from direct, indirect, and induced losses of \$3.23 million per year.



Fisheries Loss

Chart 1: Average Revenue Loss Per Year



On average, restrictions during the affected years would result in more than 95% of the current catch being eliminated. 21 of the 22 years are affected. Over the last 22 years 1998-2019, there have been 18 years where the fisheries losses from these increased restrictions would result in a loss of more than 500k dollars of foregone ex vessel value to the fishery. One of the previous 22 years would be unaffected by the proposed changes. Fishing was severely restricted in 2018 due to historically low run returns.

The sockeye fishery would experience ex vessel losses of more than \$500k for 15 of the 21 affected years.

Chart 2: Total Fishery Loss 1998-2019

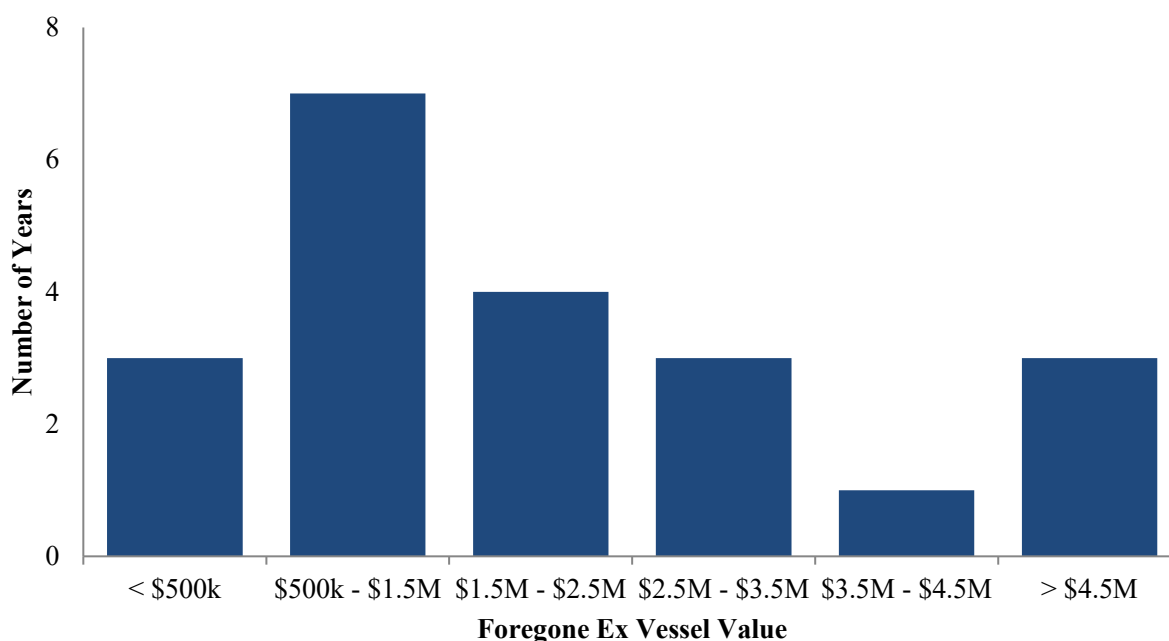
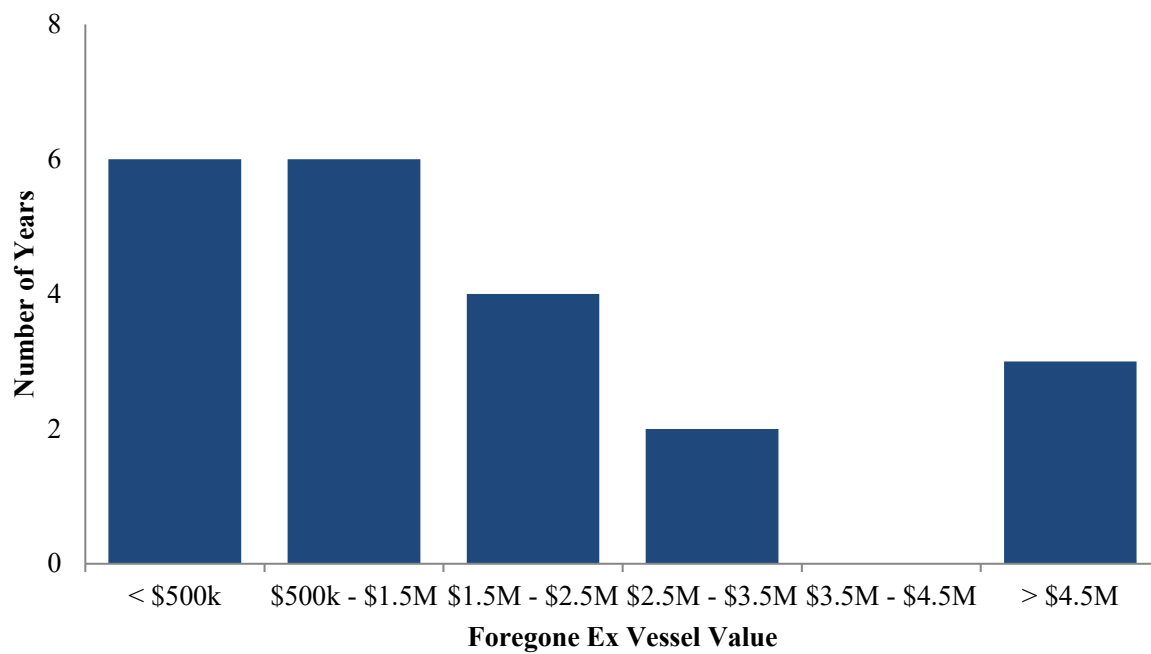




Chart 3: Total Sockeye Loss





The mean direct loss for all species per year is \$2,150,292 with a median loss of \$1,732,055. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$6,644,239 and the least impact would have been in 2014 with a loss of \$54,444.

Table 1: Direct Loss of Cape Igvak Proposal Implementation

Year	Direct Loss All Species	Direct Loss Sockeye
1998	\$132,121	\$91,646
1999	\$5,619,379	\$5,149,012
2000	\$3,097,396	\$2,831,444
2001	\$2,048,165	\$1,640,725
2002	\$851,413	\$799,675
2003	\$719,506	\$639,835
2004	\$898,710	\$869,284
2005	\$2,217,289	\$1,975,671
2006	\$528,224	\$241,350
2007	\$546,640	\$463,954
2008	\$703,717	\$144,405
2009	\$1,732,055	\$1,183,727
2010	\$2,319,549	\$1,873,907
2011	\$6,644,239	\$6,238,496
2012	\$3,806,759	\$3,482,478
2013	\$5,663,632	\$5,199,632
2014	\$54,444	\$29,775
2015	\$344,912	\$43,676
2016	\$2,761,597	\$2,462,796
2017	\$1,331,454	\$1,198,552
2019	\$3,134,923	\$559,916
Mean	\$2,150,292	\$1,767,617
Median	\$1,732,055	\$1,183,727
Min	\$54,444	\$29,775
Max	\$6,644,239	\$6,238,496

Table 2: Direct Loss of Cape Igvak Proposal Implementation Per Fishermen

	Average Loss Per Fishermen – All Species	Average Loss Per Fishermen – Sockeye Only
Mean	\$37,320	\$26,004
Median	\$25,286	\$20,256
Min	\$9,224	\$2,730
Max	\$87,965	\$76,079

Based on the number of active permits per year, individual fishermen would experience a mean direct loss for all species per year of \$37,320 with a median loss of \$25,286. If these restrictions were in place the greatest impact in the sockeye fishery would have been in 2008 with a loss of \$87,965 per fishermen with the least impact in 2003 with an average loss of \$9,224.

Table 3: Loss Per Affected Permit Holder

Year	Permits	Loss per Permit	Total Value Foregone Harvest	2019 Inflation Adjustment
1998	10	\$13,212	\$83,727	\$132,121
1999	126	\$44,598	\$3,639,494	\$5,619,379
2000	126	\$24,583	\$2,073,223	\$3,097,396
2001	81	\$25,286	\$1,409,611	\$2,048,165
2002	69	\$12,339	\$595,394	\$851,413
2003	78	\$9,224	\$514,668	\$719,506
2004	37	\$24,289	\$659,846	\$898,710
2005	71	\$31,229	\$1,683,590	\$2,217,289
2006	46	\$11,483	\$413,969	\$528,224
2007	36	\$15,184	\$440,484	\$546,640
2008	8	\$87,965	\$588,885	\$703,717
2009	28	\$61,859	\$1,444,583	\$1,732,055
2010	71	\$32,670	\$1,965,720	\$2,319,549
2011	82	\$81,027	\$5,812,982	\$6,644,239
2012	60	\$63,446	\$3,398,892	\$3,806,759
2013	78	\$72,611	\$5,130,102	\$5,663,632
2014	5	\$10,889	\$50,133	\$54,444
2015	16	\$21,557	\$317,892	\$344,912
2016	63	\$43,835	\$2,576,117	\$2,761,597
2017	83	\$16,042	\$1,269,261	\$1,331,454
2019	39	\$80,383	\$3,134,923	\$3,134,923
Average		\$37,320	\$1,771,595	\$2,150,292



Foregone Tax Revenue

State Taxes

Fisheries Business Tax (50% Share)	\$34,405
SET Tax	\$43,006
Total	\$77,410

Borough

Resource Severance Tax	\$23,116
Fisheries Business Tax (Share of 50%)	\$10,987
Total	\$34,102

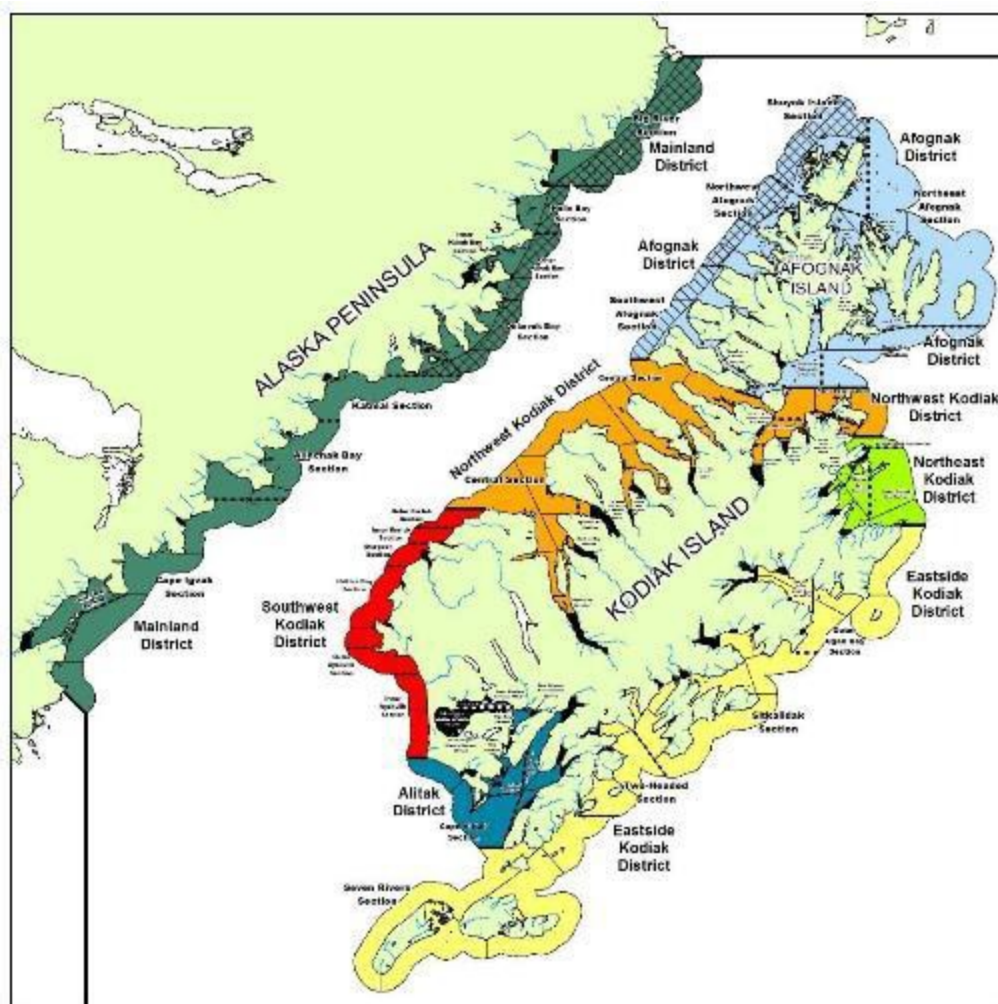
Cities

(Share of Fisheries Business Tax)

Akhiok	\$2,564
Kodiak	\$10,239
Larsen Bay	\$2,562
Old Harbor	\$2,751
Ouzinkie	\$2,659
Port Lions	\$2,643
Total	\$23,418

The foregone harvest due to Cape Igvak Proposal Implementation would have tax implications for state, borough, and city budgets. The state implements two relevant taxes in the region: the fisheries business tax (which is shared with local governments) and the salmon enhancement tax (SET). Fisheries business tax rates vary by type of processing activity and the proportion of each is estimated from the State of Alaska's Annual Tax Report for FY18. The salmon enhancement tax rate is 2% in the Kodiak region. The Borough implements a resource severance tax of 1.075% and receives a share of the fisheries business tax from the state. The local city governments also receive a share of the fisheries business tax from the State of Alaska. Borough and city shares of the fisheries business tax estimated from the Borough's FY18 annual tax report.

The implementation of these proposals would result in average yearly tax losses of \$77,410 to the State of Alaska, \$34,102 to the Kodiak Borough, and \$10,239 to Kodiak City.



Structure and Function of the Kodiak Management Area Salmon Fisheries, A Summary and Update of Brennan et al. 2017.

Kodiak Salmon Working Group
December 2019



Structure and Function of Kodiak Management Area Salmon Fisheries, a Summary and Update of Brennan et al. (2017)

by the Kodiak Salmon Work Group

In late 2017 a trio of former Kodiak area management biologists, with 34 years of cumulative, consecutive experience, authored a detailed report on the salmon fisheries and various salmon fishery management plans that pertain to the Kodiak management area (KMA). Their report was prepared in light of the potential effects of an agenda change request (ACR 11) that had been submitted by the United Cook Inlet Drift Association (UCIDA) for the Alaska Board of Fisheries work session in October 2017.

ACR 11 presented UCIDA's "umbrella plan" for Kodiak fisheries, and was essentially the same as the "umbrella plan" that is laid out in Proposal 66 currently in front of the board. Thus, the Brennan et al. report is as relevant today as it was two years ago. This report by former area management biologists also provides information that applies to the board's consideration of Proposals 64 and 65.

The main conclusion from Brennan et al. is that adjustments to the longstanding KMA management plans, such as those requested by Proposals 64-66, are not justified and would drastically damage the Kodiak salmon fisheries while providing little to no meaningful benefit to Cook Inlet fishermen or stocks.

In essence, imposition of management actions outlined in Proposals 64-66 would violate the board's Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220) and the board's Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222), and would not be consistent with the board's Allocation Criteria (AS 16.05.251(e)).

Specific Conclusions

The new mixed stock analysis (MSA), or genetic stock identification (GSI) study, on Kodiak sockeye salmon fisheries authored by Shedd et al. (2016) has limited applicability, and is not sufficient reason to change current KMA management. The salmon fisheries in the KMA are long-standing mixed stock, multi-species fisheries, with a variable and unpredictable component of nonlocal sockeye salmon.

The mixed stock nature of KMA salmon fisheries, including the incidental harvest of non-local, Cook Inlet sockeye stocks, is well known, not new.

There are no conservation emergencies for salmon and salmon fisheries within the KMA, including non-local sockeye stocks bound for Cook Inlet or Chignik.



Results of the 2014-2016 genetic MSA report did not provide sufficient cause for the board to accept ACR 11 and do not now support passage of proposals such as Proposals 64-66.
Alteration



of the KMA salmon management plans is not justified under application of the board's Mixed Stock Salmon Fisheries Policy or the Sustainable Salmon Fisheries Policy.

Pertinent Considerations

Based on location and oceanography, mixed stocks of Pacific salmon migrate through the Kodiak management area, and are harvested in KMA salmon fisheries. The mixed stock nature of KMA salmon fisheries and the KMA harvest of nonlocal, Cook Inlet-bound sockeye have long been known and accounted for.

KMA commercial salmon fishery management plans are complex and were developed with the potential for harvest of nonlocal sockeye in mind. With early-run sockeye, pink and chum, late-run sockeye and coho salmon runs showing at different systems at different times through a long fishing season, a blended management approach was formulated.

Targeting of nonlocal salmon was minimized by focusing fishing opportunity on the timing and abundance of local salmon.

In 1978, the Board of Fisheries passed the first Kodiak salmon management plan, the allocative *Cape Igvak Salmon Management Plan* (5 AAC 18.361). In 1987, based on increasing allocative disputes among set gillnet fishermen in the Alitak District, the Kodiak area management team wrote up and brought to the BOF a local stock management plan for the Alitak District.

In March 1990, the BOF considered two main Kodiak management plans. The first was the *Westside Kodiak Salmon Management Plan* (5 AAC 18.362); adopted into regulation was the blended management chronology of the major salmon fisheries in the Northwest Kodiak and Southwest Kodiak Districts.

The second, the *North Shelikof Strait Sockeye Salmon Management Plan* (5 AAC 18.363), was developed as an allocative plan meant to contain KMA salmon fisheries in the North Shelikof area after uniquely high catches of migrating sockeye occurred offshore in Shelikof Strait in 1988. The North Shelikof Plan, plus strict restriction of fishing to within three-miles of shore, precludes any repetition of 1988-style harvests on non-local sockeye, yet still provides for traditional opportunities to harvest high quality local pink and chum salmon. The North Shelikof Plan constitutes a significant contribution of KMA fisheries to the "burden of conservation" for Cook Inlet sockeye stocks.

Mixed stock analysis (MSA, via comparison of average weights and scale pattern analysis) continued on the July North Shelikof sockeye harvest and, in 1993, MSA was expanded to include the entire KMA except for the Cape Igvak fishery. The result was estimates of extremely variable numbers of nonlocal Cook Inlet sockeye stocks in KMA sockeye harvests.

Between 1990 and 1999, five more regulatory management plans were developed by the Kodiak area management team and adopted by the BOF. During those deliberations, the mixed stock nature of KMA sockeye harvests and the variable and



potentially large occasional harvest of Cook Inlet sockeye in various places around the KMA were known facts and often discussed.



The negative effects of adopting the UCIDA “umbrella plan” (ACR 11 and Proposal 66) are not presented by the proponents. But, the negative effects would be drastic: they would include extensive KMA fishery closures from late June through July resulting in substantial lost harvest opportunity, reduced salmon product quality, increased gear conflicts, and ultra-conservative management in the face of loss of traditional fishing patterns. The economy of Kodiak would be severely, negatively impacted.

Susitna sockeye are designated as a stock of yield concern, and is not a conservation concern under present day management of Cook Inlet and KMA fisheries. The Action Plan for Susitna sockeye has not included reducing the harvest from Lower Cook Inlet or KMA fisheries, though it does identify many other sources of concern, such as invasive species (northern pike), loss or alteration of freshwater habitat, change in water quality and quantity, pathogens and freshwater fisheries.

The genetic MSA report (Shedd et al. 2016) shows a snapshot of events, with some significant limitations. The limits are outlined by the authors of the report, and should be heeded. Funding limited the scope of the study, and the study design was not intended to answer many biological and allocative questions regarding incidental KMA catch of nonlocal sockeye. Further, it is apparent that the information provided by the new KMA sockeye genetic MSA may be misused, and may create more uncertainty rather than less.

Some may believe that KMA local salmon stocks could all be harvested within ‘terminal’ fishing areas or ‘inside the capes’. Long experience has shown that allowing salmon to enter the fresher (less saline), warmer, inside waters of the KMA will very quickly lead to loss of quality, or to complete loss to the fishery as the fish home-in and refuse to move out of closed water sanctuaries. Managing salmon escapement to within stated escapement goals would become much more difficult and threaten future stock productivity.

Policy for Management of Mixed Stock Salmon Fisheries and associated findings (93-07-

FB):

- The Mixed Stock Policy asserts that the board’s preference in assigning a burden of conservation in mixed stock fisheries is through the application of regulatory management plans. The KMA has operated under an interrelated suite of such management plans for decades.
- Each of the KMA regulatory management plans was developed and adopted by the Board of Fisheries with full knowledge of ongoing incidental harvest of non-local stocks, including sockeye salmon otherwise returning to Cook Inlet.
- The mixed stock nature of salmon fisheries such as those in the KMA was explicitly recognized and accepted by the Board of Fisheries in their findings.
- The very large harvest of presumably Cook Inlet-bound sockeye in Shelikof Strait in 1988 was the one instance where a “new or expanding” fishery has developed in the KMA, and the board took quick action to curtail that type of fishery expansion with the 1990 *North Shelikof Strait Sockeye Salmon Management Plan*, almost 30 years ago.



- KMA commercial salmon fishermen already bear a significant and potentially disproportionately high burden of conservation for Cook Inlet sockeye stocks through the regulations for the North Shelikof Plan. An additional burden of conservation for relatively healthy Cook Inlet salmon stocks should not be prioritized at the risk of harm to KMA fisheries and local salmon stocks.
- The BOF findings assert that “it is not the intent of this policy to create a terminal fisheries preference...” Rather, the board recognized that “stability is an important aspect of [Alaska's] fisheries,” most of which “harvest stocks which are mixed”.

Policy for the Management of Sustainable Salmon Fisheries:

- The stated goals of the policy include not only conservation of salmon and habitat, but the policy also seeks to ensure “the sustained economic health of Alaska’s fishing communities.” Moreover, the board will consider “existing harvest patterns” when formulating any fishery management plan. There is no doubt that the significant changes to KMA’s long-standing salmon management plans sought in Proposals 64-66 would drastically negatively impact the economic health of Kodiak communities.
- Fortunately, there are no major conservation concerns for sockeye salmon stocks in Cook Inlet, thus the Sustainable Salmon Fisheries Policy is currently accommodated by existing regulatory management plans.
- Regarding the Susitna stock of yield concern, the associated action plan indicates that factors other than the incidental harvest of nonlocal sockeye in the KMA, or even in lower Cook Inlet, are the appropriate focus for action.

The Alaska Board of Fisheries’ Allocation Criteria:

- The BOF has adopted directly the statutory language of AS 16.05.251 (e) as its standard for allocation criteria: subparagraphs (1), (4), (5), and (6) are most applicable to consideration of Proposals 64-66: (1) the history of each fishery, (4) the availability of alternative fisheries resources, (5) the importance of each fishery to the economy of the state, and (6) the importance of each fishery to the economy of the region and local area in which the fishery is located.
- Regarding the history of KMA salmon fisheries, they have been ongoing for over a hundred years with a recognized incidental catch of migrating, non-local sockeye bound for Cook Inlet. A large suite of regulatory management plans has been enacted to manage fisheries in the KMA, all of which considered and accommodated the variable and unpredictable harvests of mixed and non-local stocks. These harvests have become a part of Kodiak longstanding allocation and opportunity to harvest salmon. Proposals 64-66 would abrogate that recognized history and allocation, and for no apparent benefit.
- Regarding the availability of alternative resources, Proposals 64-66 purport to



protect some fraction of the Cook Inlet-bound migration of sockeye salmon through KMA fisheries, but the proposed mechanisms would directly and greatly diminish



the Kodiak fleets' ability to harvest alternative fishery resources such as local pink, chum and coho salmon.

- Regarding the importance of each fishery to the economy of the state, it is clear that the losses to KMA sockeye, pink, chum and coho fisheries caused by adoption of Proposals 64-66 and others, would greatly overshadow the minimal (if even detectable) gains that might accrue to the Cook Inlet fisheries. Thus, there would be a net negative impact to the economy of the state.
- Regarding the importance of each fishery to the economy of the region and local area, it is clear that a very large portion of the economy of Kodiak Island is directly dependent upon the harvesting and processing of sockeye, pink, chum and coho salmon. By contrast, the Cook Inlet sockeye fisheries comprise an important but proportionately less dominant contribution to the economy of Cook Inlet communities, the greater Anchorage area, and the Matanuska-Susitna region. Moreover, the very small (likely undetectable) gains to sockeye harvests in Cook Inlet constitute even that much smaller a contribution to the greater Cook Inlet economy.
- Finally, while not stated explicitly in the language of the Allocation Criteria, there is an implicit requirement of fairness, equity, and proportional benefit and cost for any action taken by the board. In this instance, it is clear that actions to implement Proposals 64-66 would impose costs many, many times higher than any possible calculation of benefit and thus would violate any reasonable standard of fairness or equity.



A Review of Agenda Change Request #11 and the ADF&G Kodiak 2014-2016
Sockeye Genetic Mixed Stock Analysis technical Fishery Manuscript, with
recommendations to the BOF.

Compiled By:

Kevin Brennan,

Dave Prokopowich, and

Larry Malloy

Prepared for the Kodiak Salmon Work Group
September 25, 2017



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INTRODUCTION: BOF AGENDA CHANGE REQUEST CRITERIA AND CONSIDERATION OF ACR #11

United Cook Inlet Drift Association has submitted an Agenda Change Request (ACR #11), asking the BOF to consider an out-of-cycle proposal for a new salmon management plan in the Kodiak Management Area, to limit nontraditional harvest of nonlocal sockeye in KMA commercial salmon fisheries.

Normally, Kodiak Finfish issues are addressed during regularly scheduled (on-cycle) BOF meetings; only if the BOF accepts a properly submitted Agenda Change Request (ACR) will unscheduled (off-cycle) BOF consideration be approved. ACRs, reviewed at fall BOF work sessions, must meet the Policy for Changing Board of Fisheries Agenda (5 AAC 39.999). ACR consideration usually requires clear and concise biological concerns. Subsequent allocative considerations receive a lower priority. Application of BOF Criteria and Policies requires that unless there is compelling NEW information, then any allocatively-based ACRs would be denied. Such issues would then come up at the next on-cycle BOF meeting (for Kodiak Finfish that would be the 2019/2020 cycle).

The Criteria for an Agenda Change Request are found in the Alaska Administrative Code (regulations). For this discussion, the pertinent portions of that regulation are as follows:

5 AAC 39.999. POLICY FOR CHANGING BOARD AGENDA. (a) The Board of Fisheries (board) will, in its discretion, change its schedule for consideration of a proposed regulatory change in response to an agenda change request, submitted on a form provided by the board, in accordance with the following guidelines:

- (1) the board will accept an agenda change request only
 - (A) for a fishery conservation purpose or reason;
 - (B) to correct an error in a regulation; or
 - (C) to correct an effect on a fishery that was unforeseen when a regulation was adopted;
- (2) the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information found by the board to be compelling.

Based on our review of the new MSA report and ACR #11, our brief responses to these criteria are:

Criteria 1(A): The BOF may accept an ACR for a fishery conservation purpose or reason. However, there isn't a Conservation Concern for any sockeye salmon stock in the Cook Inlet or Kodiak Management Areas. Published ADF&G forecasts for the 2014 to 2016 (GSI study years) and 2017 for Cook Inlet salmon fisheries predicted harvestable surplus for all sockeye stocks. Commercial fisheries were prosecuted in Upper Cook Inlet from 2014-2017, and there is no chronic inability to meet UCI sockeye escapement goals. Susitna sockeye are a Stock of Yield Concern, not a Conservation Concern. A BOF approved Action Plan was developed in 2008 and has been modified with BOF review (more detail is offered below).



Criteria 1 (B): The BOF may accept an ACR to correct an error in a regulation.

We feel there are no errors in current regulations governing the KMA salmon fisheries. This salmon fishery has been identified as a Mixed Stock Fishery, and past studies have revealed similar numbers and percentages of Cook Inlet sockeye present in KMA harvests, as did the new Kodiak sockeye genetic MSA study. KMA regulatory Salmon Management Plans (SMP) were written, discussed, and passed by the BOF with that knowledge.

Should that fact then dictate that nonlocal salmon in KMA harvests be discussed by the Board to consider possible change to KMA commercial salmon fishing regulations, then the BOF may schedule the issue for the on-cycle, regularly scheduled Kodiak finfish meeting. That option also allows for continued study, education, discussion and potential agreement or acceptance by stakeholders. Options and possible courses of action could be discussed among ADF&G researchers and managers.

An error in regulation is more likely with hasty, ill-prepared, unjustified or politically motivated proposed regulation changes. An issue of this importance and complexity deserves adequate consideration prior to changes to traditional and historical fisheries, changes which would also bring severe economic consequences to the Kodiak salmon fishery.

Criteria 1 (C): The BOF may accept an ACR to correct an effect on a fishery that was unforeseen when a regulation was adopted. There hasn't been any "effect on a fishery" demonstrated by ADF&G's new MSA study or report. There was substantial data, yet little to no analyses. The net effect of the KMA harvest of nonlocal sockeye is not new nor has it been demonstrated that it is endangering any sockeye stocks. Perhaps an ADF&G evaluation of the effect of KMA harvest of nonlocal sockeye is needed, and we suggest taking the time to ask the Department that, and other germane questions.

The presence of relatively large numbers of Cook Inlet salmon within KMA commercial salmon harvests during any year cannot be categorized as "unforeseen," for the reasons stated throughout this review. As previously shown, even a measure of the magnitude of the KMA commercial harvest of Cook Inlet sockeye estimated by the new MSA study was clearly demonstrated and reported to the BOF in the early to mid-1990s (over 20 years ago). No negative effects on the nonlocal sockeye stocks have been shown. Unfortunately, many UCI fishermen may hear of the NEW study and expect that the Mixed Stock nature of KMA salmon fisheries was an unforeseen effect.

Criteria (2): The board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information found by the board to be compelling.

Does this new MSA study and report show that there should be new concern for the sustainability or conservation of any Cook Inlet sockeye stock? In the absence of a Biological Concern, what remains are Allocative Concerns. Based on our experiences, we do not believe that the new MSA is new and compelling.

We feel that the BOF should not accept any ACRs regarding KMA nonlocal salmon harvest at fall Board of Fisheries work sessions. Board review of KMA commercial salmon fishery



regulations should remain ON-CYCLE, to next occur during the BOF's 2019/2020 meeting cycle.

We have ISSUES with the ISSUES PRESENTED by UCIDA in ACR #11. There are misstatements and untruths contained in the ACR explanations and descriptions. For clarity, we comment on the UCIDA responses to the questions posed on the Agenda Change Request Form:

ACR #11 - Question 1: UCIDA asks for the adoption of a new regulatory management plan for the KMA. As stated, we do not believe that the Criteria for an Agenda Change request have been met.

ACR #11 Question 2: UCIDA states that the problem is “the harvest of Cook Inlet and other non-local salmon stocks in the Kodiak Area”.

No evidence of harm or any problem with UCI sockeye stocks is shown or postulated. It appears that UCIDA feels that ANY harvest of nonlocal salmon in the KMA is a ‘problem’, despite the fact that Cook Inlet salmon have historically been present in the KMA and were identified in KMA salmon harvests in virtually all KMA MSA studies. Nonlocal sockeye salmon are a natural occurrence in the KMA, the magnitude of which may be related to overall abundance. Many uncontrollable factors are involved such as weather, ocean conditions, and migratory patterns.

ACR #11 - Question 4A: The fishery conservation purpose or reason appears to be that currently ADF&G does not use precise genetic stock estimates in development of escapement goals, management plans or brood tables.

ADF&G will use the best science available, and has successfully managed UCI and Kodiak sockeye stocks without precise genetic stock composition estimates. The KMA genetic MSA was just finished and published. TIME is needed to attempt to use data from the recent MSA. The new Kodiak sockeye genetic MSA was not designed or analyzed to determine appropriate limits on nonlocal, Cook Inlet sockeye harvest in KMA fisheries. Additional genetic studies, such as that conducted annually in Upper Cook Inlet, would be necessary.

ACR #11 - Question 4B: The error in regulation given by UCIDA seems to be the inaccurate or unfairly applied burden of conservation.

The Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222), in subsection 4) D), states “in the absence of a regulatory management plan that otherwise allocates or restricts harvests, and when it is necessary to restrict fisheries on salmon stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to each fisheries’ respective use...” (emphasis added). UCI sockeye escapements are met, Cook Inlet salmon fisheries are allowed, so the conservation burden is minimal. There is not a known conservation problem; Susitna sockeye are a Stock of Yield Concern only.



KMA already shares the burden of conservation with Cook Inlet. In December 1989, the Board passed a regulatory plan for the harvest of Cook Inlet sockeye salmon in the KMA, the North Shelikof Strait Sockeye SMP, which:

- o is located to afford the most protection for UCI sockeye as they migrate through the KMA commercial salmon fisheries (the North Shelikof);
- o is timed to cover the estimated peak timing of nonlocal sockeye presence in the KMA (July 6-25);
- o local Kodiak salmon forecasts and run strength indicators, with designated 2½ to 4½ day fishery closures each week; and,
- o only allows continued fishing in inshore waters (Shoreward Zones; offshore Seaward Zones, from the baseline to the 3 mile limit, are closed).

This is already a very large conservation burden on KMA fishermen, for which no positive net effect on UCI stocks has ever been demonstrated. Over half of the Mainland and Afognak Districts are subject to fishery closures in July, based on the 1988 KMA harvest of nonlocal Cook Inlet salmon. Many KMA stakeholders would say that the conservation burden is currently unfairly slanted against KMA fishermen.

ACR #11 - Question 4C: The magnitude of nonlocal salmon harvests was known and was before the Board when KMA management plans were deliberated and adopted, but a new MSA has inspired a new round in the ongoing Cook Inlet-Kodiak fish fight.

This type of proposal is not new. In the past, UCIDA and UCI stakeholders have submitted many proposals for changes in management of the KMA fisheries. Very similar proposals were submitted to the BOF in the mid-1990s. With dozens of meetings and hundreds of hours of BOF discussions, committee discussions, as well as 2 years of work by a BOF ADF&G-Stakeholder Cook Inlet-Kodiak Inter-Area Work Group, it is clear to us that the BOF has been informed, has reviewed the KMA nonlocal salmon issue, and has deliberated on such restrictive management plan proposals.

ACR #11 - Question 6: UCIDA rightly admits that their ACR (#11) is allocative. We concur.

ACR #11 - Question 7: This compels the Board to consider an allocative proposal outside of the regular cycle. UCIDA claims that “Now, years later, with the aid of genetics, we know much more about the timing, location, extent and magnitude of the harvests of Cook Inlet origin salmon stocks. This ACR is the first opportunity to look at the harvest of Cook Inlet stocks in the Kodiak Management area, and we consider this a very serious misstatement of fact. This is not the first look at harvests of Cook Inlet salmon in the KMA. Beginning in the 1920s, salmon researchers have studied KMA salmon stocks composition and shown that Cook Inlet salmon contribute to KMA commercial fisheries. The magnitude of nonlocal sockeye in KMA commercial fishery harvests has been previously studied extensively by ADF&G. MSA estimates were conducted and reported to the BOF and the public between 1989 and 1996, with similar results as the new genetic MSA.



The recent 2014-16 Kodiak genetic MSA has indeed added to the data available, however it gives little to NO definitive answers to migratory timing, location, extent or magnitude of nonlocal salmon passing through the Kodiak Management Area. It was a limited, short term study that looked at only some parts of June-August KMA salmon fisheries for only three years (three data points for each temporal/spatial stratum). Data was pooled into three fairly long temporal periods and six fairly large geo-spatial strata. For any temporal/spatial strata, there are only three annual data points. Three data points will show a false trend more often than a true trend. Three data points are most likely to show no trend.

The study cannot infer an absolute or precise harvest rate of nonlocal sockeye in KMA provided limited results from a limited sampling plan that was NOT intended to provide nonlocal salmon harvest rates, but rather the sockeye stock components of selected KMA fisheries during limited time periods. UCIDA claims that the Kodiak sockeye genetic MSA is new information that should prompt the BOF to “look at the harvests of Cook Inlet sockeye stocks in the Kodiak Management Area. We strongly disagree. Again, more will be discussed regarding these point, in subsequent parts of this review.

ACR #11 - Question 9: UCIDA clearly states that there is NEW proposal, “not previously... before the board” and that it was “modeled after existing portions of both the Kodiak and Cook Inlet Alaska Administrative Code themes and regulations.”

The proposed UCIDA restrictive umbrella plan form ACR #11 is not a new proposal. It is modeled after proposals from the November 1995 Kodiak Finfish BOF meeting and prior BOF meetings.

At that meeting, there were several such proposed changes to KMA fisheries. And the Board did not adopt any further restrictions. In the Summary of Actions taken at that meeting, it clearly states that “the past Board had pretty much resolved the issue in 1989 utilizing the best information available. And that information has not changed to this point. The effort and catch has increased in the disputed areas due to local management practices in other areas of Kodiak. And it is difficult to determine if this (is) a new and expanding fishery when both this area and Cook Inlet fisheries are at an all-time high. The overriding reason for apparent increase in intercept of Cook Inlet stocks seems to be directly related to the density and strength of that run.” (emphasis added).

The 1995 Board of Fisheries reviewed MSA and harvest information and determined that shifts in effort levels could be fishermen movement due to closures of North Shelikof fisheries SMP, not new or expanded targeting of Cook Inlet stocks. They recognized that nonlocal salmon harvests occur in KMA fisheries and the relative level of such harvests were related to run strength. No biological concerns and no allocative concerns meant no change to Kodiak SMPs.

In both 1995 and 1988, Kodiak salmon fishermen submitted proposals to increase the harvest triggers used in the North Shelikof July 6-25 fisheries. They did so because the number of local Kodiak sockeye had increased since 1988, due to both an increase in natural production and increased enhancement of Kodiak sockeye. This would have increased the number of local



sockeye salmon available in the North Shelikof fisheries. However, because of the complexity of the situations involved, the BOF did not accept either proposal.

There were subsequent changes to the North Shelikof SMP. In 2002, the Ouzinkie Native Corporation, representing tribal commercial fishermen from Ouzinkie and Port Lions, proposed a less restrictive plan for Southwest Afognak section commercial salmon fisheries during the North Shelikof SMP mid-season time period (July 6-25). The BOF allowed KMA fishermen to continue to fish traditional seine hauls in the Southwest Afognak Section out to within ½ Mile of the baseline (a reduction of the Seaward Zone). And at a regular Kodiak Finfish meeting in January 2008, the Board accepted an amended version of the Ouzinkie proposal, reducing the Seaward Zone in the Northwest Afognak Section to allow KMA fishermen to continue to fish traditional seine hauls.

The BOF, despite multiple considerations of the KMA salmon fisheries and the North Shelikof plan, has not accepted proposals for increased restriction of KMA fisheries based on Cook Inlet sockeye salmon harvests within the KMA.

Concern is expressed in the ACR that if the proposed plan is not adopted, KMA salmon fisheries continue to incidentally harvest nonlocal Cook Inlet sockeye salmon, and then there will be detrimental biological or ecological effects. Yet there are no examples given of what detriments have been experienced in Cook Inlet due to recent KMA salmon fisheries or fishing patterns. Nor was any potential biological or ecological harm identified in the ACR #11.

Since 1989, the Board of Fisheries has addressed dozens of proposals from Cook Inlet salmon fishery stakeholders, for KMA management plans or regulatory restrictions. And very few changes have been made to the existing Cook Inlet-Kodiak allocative SMP by the BOF, and the BOF has not deemed it necessary to expand the regulatory KMA fishery restrictions by time (before or beyond 7/6-25) or location (North Shelikof vs. other major fishing areas of the KMA such as the east side or southwest sides of Kodiak Island).

UCIDA's proposal would establish a complicated plan covering an expanded time period (5 weeks, from 6/25 to 7/29) and newly expanded locations to include most of the KMA wild stock salmon fisheries. Within the identified time period and locations, there would be weekly and "seasonal" (6/25 to 7/29) commercial harvest limits for sockeye salmon.

This proposed plan would completely change the nature of KMA commercial salmon fisheries, and the opportunity for KMA salmon fishermen to harvest millions of local salmon would be uncertain or lost due to shifting of fisheries to only inner bays and terminal harvest areas.

Long-standing harvest strategy criteria by which KMA managers have operated could be more difficult to assure or complete. For example, since about 1971, the KMA general pink salmon fishery has been managed to coordinate multiple fishery openings whenever possible, (several locations over a wide area opening to the salmon fishery during the same time periods) to disperse the purse seine fleet. More restriction of fishing areas means more boats in smaller places, increasing the likelihood of conflict. And since about 1980, managers have attempted to



maximize harvest opportunities on the highest quality salmon during orderly fisheries. More restrictions and a completely new harvest management plan would reduce opportunities, and would likely lead to poorer quality salmon products (brighter, fresher salmon are found outside of bays and in early pink salmon fisheries) as well as the potential for more gear conflicts.

Managers would be forced to be ultra-conservative in order to meet the proposed new plan's expectation that fishery managers would make closure announcements if they EXPECT a limit to be reached or if the current harvest is within 15% of that limit. The weekly and seasonal sockeye harvest limits given in the UCIDA proposal are vastly lower than actual harvest in the past. For example, for the Westside Districts the proposed weekly limit is 12,500 sockeye, yet over the past ten years (2008-2017) the weekly Westside sockeye harvest during the 6/25 to 7/29 plan duration has averaged over 61,000 sockeye.

In our opinion, such widespread KMA fishery restrictions in late June through July (five weeks in the middle of the KMA salmon season) would greatly reduce ADF&G's management precision (more uncertainty means more conservative management) and increase the likelihood of 'lost' harvest opportunities, reduced quality of the pink salmon harvested and increase the likelihood that Kodiak sockeye and pink salmon escapements would exceed the appropriate levels that have been determined by ADF&G and the BOF.

And, the proposed sockeye harvest limits are substantially below the recent or historical sockeye harvests in those fisheries. The vast majority of past KMA salmon fisheries (1985-present) would have been restricted had this proposed umbrella plan been in effect. The proposed management plan's weekly and/or seasonal sockeye harvest limits would have been met, forcing restriction of major KMA fisheries to only inshore waters.

This is a long-running fish fight, and one could expect that the KMA stakeholders would follow with their own Agenda Change Requests, proposed management plan adoption or modifications, negative rhetoric, legislative inquiries or legal actions. The effects of the proposed UCIDA umbrella plan on traditional strategies and fishing opportunities would force a substantial negative response by not only the KMA salmon fishermen, but by processors, business owners, local Borough and City governments, and local legislators that would know and experience the negative ramifications to KMA mid-season salmon fisheries.

Based on our knowledge of the KMA commercial salmon fishery, it is expected that should this proposal pass as is, it would severely cripple the Kodiak commercial salmon fishery and devastate the Kodiak economy.

**IS THERE AN EMERGENCY OR COMPELLING NEW INFORMATION?**

We feel there is no biological or conservation-based emergency, nor compelling new information that forces the Board to consider this Allocative Proposal. Therefore, we see no reason to take this issue up out of the regular BOF fishery-review meeting cycle.

BIOLOGICAL CONCERNS are mentioned in UCIDA's ACR #11. For a salmon run, escapement and resulting production are known biological concerns that are affected by commercial salmon fisheries.

Escapement estimation for Upper Cook Inlet salmon streams is a complicated and changing process. Based on data obtained from ADF&G, it appears that sockeye salmon escapement goals are generally being met (Table 1), and there is no chronic inability to meet escapement needs.

Table 1. Upper Cook Inlet sockeye salmon escapement goal ranges and recent escapement estimates, 2010-2017. Data from ADF&G, Division of Commercial Fisheries, Anchorage, 8-22-17.

Sockeye Escapement Goal Ranges ¹								
2010			2011	2012	2013	2014	2015	2016
Kasilof River	160,000 - 340,000	267,013	245,721	374,523	489,654	439,977	470,677	239,981
Kenai River	1,000,000 -	970,662	1,300,000	1,599,217	1,581,555	1,359,893	1,520,340	1,704,767
Fish Creek	15,000 - 45,000	126,829	66,678	18,813	18,912	43,915	102,296	46,202
Chelatna	20,000 - 45,000	37,784	70,353	36,736	70,555	26,212	69,897	60,792
Judd	15,000 - 40,000	18,466	39,984	18,715		22,229	47,934	No Count
Larson	15,000 - 35,000	20,324		16,566	14,088		23,185	
			12,190		21,821	12,430		14,333

1. Escapement goals are those provided by ADF&G following a 2017 Board of Fisheries review.

Harvestable surpluses of UCI sockeye salmon have been consistently realized. ADF&G forecasts for 2014-2017 Cook Inlet salmon fisheries show significant surplus sockeye salmon production, over and above published escapement needs. Harvest records show that recent annual Cook Inlet sockeye salmon commercial harvests were in excess of forecast.

Actual Cook Inlet commercial, subsistence or sport harvests may vary and at times may even be lower than in the past. However, commercial fisheries were prosecuted in Lower and Upper Cook Inlet resulting in Cook Inlet commercial salmon fishery harvests of millions of sockeye salmon. Sockeye salmon production seems to be near historical highs, based on data provided by ADF&G.

A STOCK of CONCERN designation was placed on the Susitna sockeye stock in 2008. However, the Susitna sockeye stock was categorized as a YIELD concern, not a Management or a Conservation Concern. Even that designation was not without controversy, both for and against. The level of Concern for Susitna sockeye has not changed with almost 10 years of subsequent ADF&G and BOF review.

Based on the Policy for the Management of Sustainable Salmon Fisheries, "yield concern" means a concern arising from chronic inability, despite the use of specific

management needs (5 AAC 39.222(f)(42)). Based on the Sustainable Salmon Policy, there is an Action Plan for Susitna sockeye salmon as a Stock of Yield Concern, and that plan is reviewed and updated as necessary during salmon area specific BOF meetings. The Action Plan, in part, must contain goals, measurable and implementable objectives, and provisions, including fishery management actions needed to achieve rebuilding goals and objectives, as well as descriptions of new or expanding salmon fisheries.

Within the Susitna sockeye salmon Action Plan, there are NO new or expanding fisheries listed. This is especially surprising when considering the near meteoric rise in sport fishing effort and commercial sport fishing operations (guides, charter operators and lodges) across the State of Alaska in the past 20 years. The Kodiak commercial salmon fishery has not been identified as ‘New and Expanding’, nor have any portion of KMA salmon fisheries.

The Susitna sockeye salmon Action Plan designates that ADF&G Division of Commercial Fisheries will manage the Susitna sockeye stock using commercial fishery regulation of Upper Cook Inlet’s Northern and Central Districts, only (Figure 1). There are no commercial salmon fisheries restrictions in Lower Cook Inlet (5 Districts) based on this Stock of Concern.

It seems like an over-reach to ask for severe commercial fishing restriction in the KMA, so far ‘downstream’, while ignoring Lower Cook Inlet. Especially since all Upper Cook Inlet stocks MUST pass through Lower Cook Inlet.

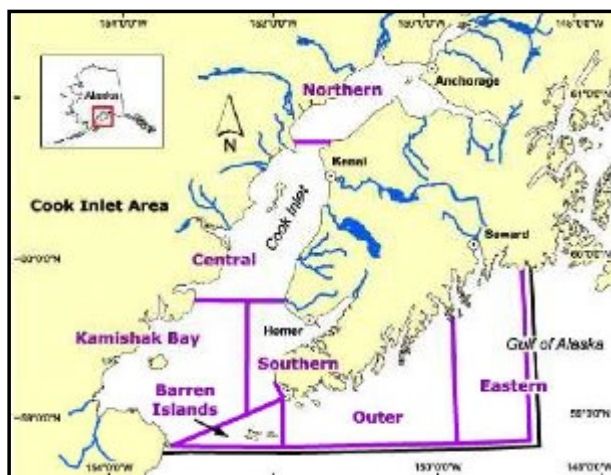


Figure 1. Map of Cook Inlet’s commercial salmon fishing districts. Figure taken from ADF&G website

ADF&G has identified several other factors, besides natural or incidental mortality, that may be affecting the survival (yield) of Susitna sockeye salmon in freshwater (spawning and rearing areas), including the introduction of invasive species (Northern Pike), loss or alteration of habitat, changes in water quality or quantity, pathogens, or harvest by sport fishing. Yield Concerns, by definition, are NOT concerns for the sustainability or successful management of the stock, rather it is concern for lower than desired harvestable surpluses, above expected



escapement needs. To ‘conserve’ UCI sockeye salmon for harvest by a select group of Alaska fishermen, for only Cook Inlet commercial salmon fishermen or sport fishermen or commercial sport fishing business owners, is based on allocation; it is not a concern for conservation caused by new and expanding fisheries.

We feel confident that no biological reason exists for restricting KMA fisheries in order to protect Cook Inlet-bound salmon, based on the information given in the UCIDA ACR, or in the 2014-16 KMA genetic MSA (more in following part of this review).

Nothing New has been determined with which to accurately determine the impact of KMA sockeye harvests of nonlocal salmon on Cook Inlet sockeye salmon stocks.

Perhaps some people have assumed that the magnitude of the Cook Inlet sockeye component of KMA harvests was an unknown. Perhaps some people assumed that Cook Inlet salmon rarely migrate through the KMA, so the harvest numbers in the report were shocking to them.

However, the 2014-16 MSA report was not an analysis of nonlocal sockeye harvest in the KMA. It is a reporting of recent data collected in yet another MSA in the KMA. In the 2014-16 KMA sockeye genetic MSA, only very limited information from past tagging studies was included, and there is only one citation from several Kodiak MSA reports by ADF&G from 1989-1996.

Without a discussion of ‘How we got here’ it is often difficult to correctly ascertain exactly where we are now. It is unfortunate that, in the new MSA report, Shedd et al (2016) included only very limited information on past Kodiak sockeye MSA studies and published reports.

Earlier MSA Studies were Conducted in the KMA using existing fisheries data and samples, such as analyses of run timing, or of scale samples for stock-specific age-markers or patterns, or use of average sockeye salmon lengths or weights from KMA vs CIMA commercial harvests. A quick comparison shows that many data from the new KMA genetic MSA and from previous KMA average weight MSAs are similar. There was no mention or analysis of these facts in the new MSA report.

Included in the new MSA report are over 60 tables describing the annual estimates of local and nonlocal sockeye salmon in each of six preselected geographic areas (geospatial strata) during each of three time periods (temporal strata). The middle stratum encompasses the July 6-25 period used in earlier studies, so is most comparable with that earlier data. The 1994 Barrett and Vining report also looked at specific area harvests, some of which approximate the 2014-2016 sampling areas.

Barrett and Vining (1994), using average weights, estimated the stock compositions of KMA July harvests from eight KMA locations (geospatial strata), which are basically the same as the geospatial strata in the recent KMA genetic MSA. For example, in Barrett and Vining (1994), for Ayakulik and Halibut Bay, the nonlocal (Cook Inlet) sockeye harvests for July, 1988-1992, ranged from 103,900 to 444,400 fish. In the recent KMA genetic MSA report, the mid-season (basically July) 2014-2016 KMA harvest of nonlocal sockeye in the Ayakulik/Halibut Bay strata



ranged from 41,300 to 185,100 fish. From this comparison it is obvious that the earlier studies not only showed that Cook Inlet sockeye were present and were caught in July Ayakulik halibut Bay fisheries, but that the magnitude of the incidental harvest was greater than in 2014-2016. Should the NEW information be touted as a decline in nonlocal salmon harvests, or only annual variability?

Using another example, the 1988-1992 MSA (Barrett and Vining 1994), the July (mid-season strata) Cape Alitak nonlocal (Cook Inlet) sockeye salmon harvest was estimated at 46,400 to 63,200 fish, and in the 2014-2016 KMA genetic MSA (Shedd et al, 2016) the harvest of nonlocal sockeye in the Alitak District ranged from 37,500 to 127,700 fish. The average weight MSA estimated significant harvest of nonlocal sockeye in the Alitak District, which was confirmed by the KMA genetic MSA. However, does the new MSA study point out an increase in nonlocal salmon harvest in the Alitak Bay District, or annual variability?

There is simply no truthful way to claim that the harvest of nonlocal, Cook Inlet salmon is new information, or that the magnitude of those incidental harvests is new information, or that the timing and estimated number of incidental sockeye harvested is anything but unpredictable and widely variable between and among years.

The New Genetic MSA Report, by presenting seemingly new MSA data with high numbers and percentages of nonlocal salmon in KMA salmon harvests, without comparing that to past study data and results (such as previously determined bycatch levels of Cook Inlet sockeye in KMA harvests), has led to unfounded conclusions and has created an emotional response by stakeholders from Cook Inlet fisheries. Vital information is not included, again pointing to the need for development of a comprehensive document or set of data, for review by stakeholders and the BOF prior to deliberating on any proposed change to KMA salmon management.

In the new 2014-2016 Kodiak sockeye genetic MSA report, authors show the number of nonlocal, Cook Inlet sockeye salmon estimated to be harvested in KMA commercial fisheries as a percent of the KMA commercial harvests during selected time periods and within selected portions of the area. This shows the estimated stock contribution rate (stock proportions) of the KMA harvest. We feel this has been misleading for some people.

The Kodiak genetic MSA provides nonlocal harvest data as a percentage of the KMA harvest. It does not attempt to show the potential impact to Cook Inlet stocks. It is understandable (and should have been expected) that some people, upon seeing tables of numbers demonstrating large percentages of nonlocal salmon, may jump to the conclusion that there is a danger to the sustainability of any seemingly fully utilized stocks. The new MSA report does not provide a comparison of the estimated KMA nonlocal Cook Inlet harvest to the total Cook Inlet sockeye harvest or run, or to individual CI sockeye runs (a harvest rate).

But again, as with number of salmon, similarity between the nonlocal stock contribution proportions from earlier and recent KMA sockeye MSA is quickly evident.



Within the new MSA report, the 2014-2016 estimates of overall nonlocal contribution to KMA harvests ranged from 12% (2014) to 42% (2015 and 2016); this is within the ranges determined by earlier studies, and is not new information. In 1996, ADF&G estimated that overall, during July 6-25 sockeye salmon harvest for 1983-1995 (excluding 1989), nonlocal sockeye salmon were from 10.6% to 76.2% of the KMA harvest (excluding Cape Igvak; Vining 1996).

The average weight studies were a rigorous scientific statistical analysis, much discussed, agreed to by ADF&G headquarters, Cook Inlet and Kodiak ADF&G staffs, edited by ADF&G, and the various authors thoroughly discussed the limitations of such a study and cautioned against misapplication of results.

Comparing the estimated number of nonlocal Cook Inlet sockeye harvested in sampled KMA commercial salmon fisheries against the total Cook Inlet harvest or total run, gives a look at the harvest rate of Cook Inlet salmon in KMA fisheries. This is an important distinction, if one is trying to gauge the potential biological impact of bycatch of Cook Inlet sockeye salmon (Table 2). Still, great caution must be employed when trying to determine accurate harvest rates for Cook Inlet sockeye in KMA fisheries. We can only generate very rough estimates of harvest rates from the available data. The 2014-2016 KMA sockeye genetic MSA was not intended or designed to provide accurate harvest rates of Cook Inlet-bound sockeye in KMA fisheries.

Table 2. Estimated KMA nonlocal Cook Inlet sockeye harvest in select KMA commercial fisheries, 2014-2017. Data from ADF&G Anchorage, 8-22-17.

Year	Estimated KMA Harvest of CI Sockeye	Cook Inlet Sockeye Salmon		
		% of KMA harvest	% of Cook Inlet Harvest	% of Cook Inlet Run
2014	113,972	7.5%	4.2%	2.1%
2015	626,473	36.6%	17.9%	9.1%
2016	384,089	29.6%	12.4%	6.9%

Table 2 (above) shows that current estimated harvest percentages are also in agreement with Vining (1996); he showed the estimated percent of the UCI sockeye runs (in the Kodiak Management Area harvest) from 1983-1995 ranged from 1% to 12.1%. Using an overall estimate, it appears that less than 15% of Cook Inlet sockeye runs are harvested in KMA fisheries. It is interesting to note that the other KMA allocative plan, the Cape Igvak plan, allows KMA fishermen to harvest up to 15% of the Chignik sockeye runs. Annual variability is again perhaps the only fact that is clearly demonstrated.



The study and report document only numbers and percentages. Authors (Shedd et al, 2016a) do not comment on whether nonlocal sockeye presence and levels were an affirmation of historical migration patterns and natural background levels of historic bycatch in commercial salmon fisheries targeting Kodiak salmon stocks in this known Mixed Stock fishery.

LIMITATIONS OF THE KMA GENETIC MSA

The recent MSA study was only the first look at a KMA mixed stock fishery using modern stock separation methods (Genetic Stock Identification). And, the report clearly informs readers that it only provided new harvest statistics for some fisheries for a limited set of years, for limited time periods. The lack of analyses or any further interpretation of this data and the lack of comparisons with previous sockeye stock composition estimates, within the KMA genetic MSA report or in a separate report, has led some people to draw their own conclusions.

CAUTIONS: However, the authors (Shedd et al, 2016a) did specify that, since the study was limited, caution must be exercised when trying to extrapolate limited results to wider questions or if trying to fit the data to other issues: “However, while this 3-year data set provides some measure of interannual variability in environmental and fishery conditions, some caution must be exercised when extrapolating the results to years, areas, and temporal periods not analyzed because changes in relative abundance among reporting groups, prosecution of fisheries, or migratory behavior due to ocean conditions very likely affect distribution of stock-specific harvests among fisheries.” (Shedd, et al, 2016a, page ; emphasis added).

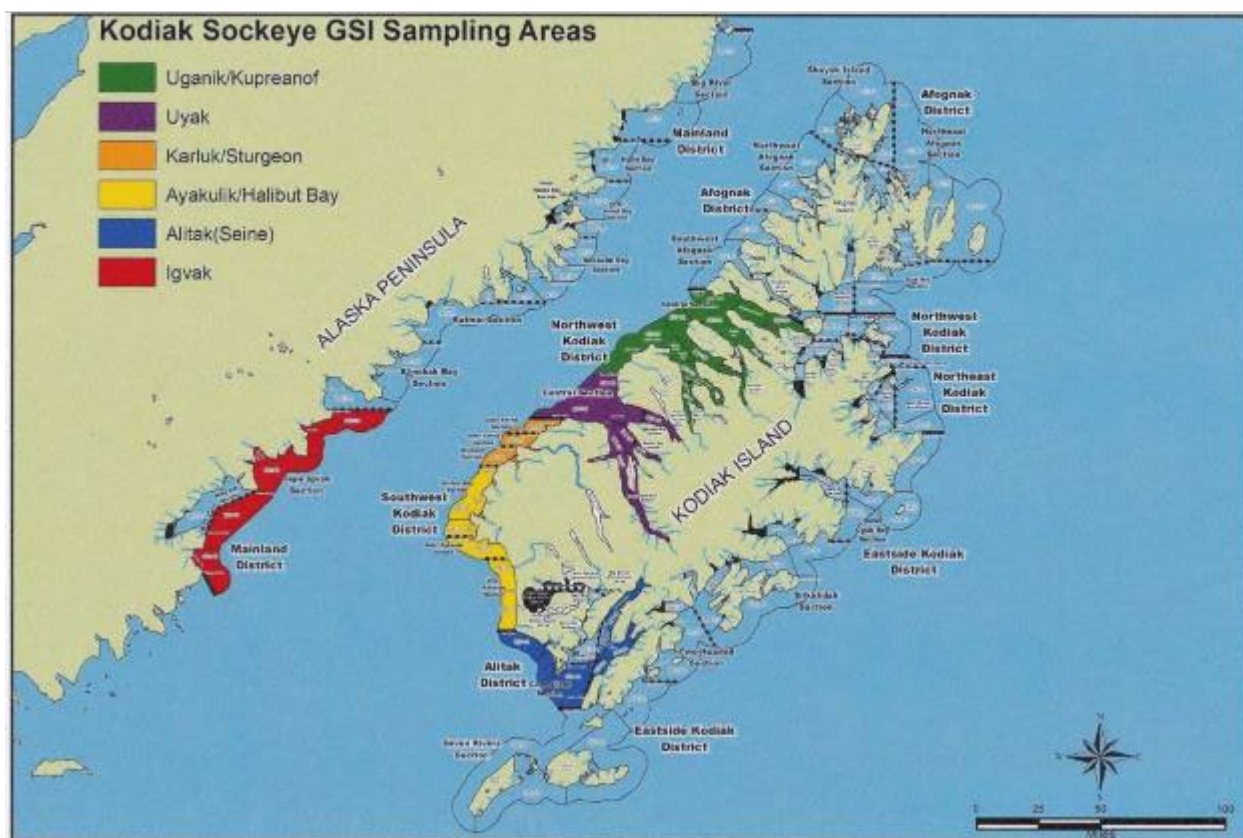


Figure 2. Kodiak Area management units sampled for genetic stock identification, 2014-2016.

Figure taken from Shedd, et al, 2016.

Funding Limits are very real constraints. Authors of the 2014-16 MSA report also found that



“funding constraints limited the scope of this project to specific sampling areas and time periods”. The genetic sockeye MSA study planners had to limit both the study area (number of geospatial strata) and the time periods (temporal strata within the June 1 to October 31 KMA commercial salmon fishing season). Though the initial objective of this project was to sample the major directed sockeye salmon commercial fisheries in marine waters of KMA, only eight locations were selected, with all of them in the west and southwestern part of the KMA (Figure 2). Only three sampling time periods were used, spanning June 1 through August. Significant harvests of sockeye salmon can occur in September and October.

Other Limits: It is clear that the new MSA study is a “snapshot”, showing results of samples collected from limited areas during limited time periods over a limited set of years. Not included in this new MSA study were not only the known areas where KMA fisheries may target nonlocal stocks (Afognak and Mainland District sections bordering the North Shelikof), but also areas of prior Board review for KMA harvest of nonlocal sockeye (Eastside Kodiak District). The authors of the new MSA report admit that, succumbing to funding limits, they sampled less than they intended, both in areas covered and time periods sampled.

The authors admit that GSI techniques are not robust enough to distinguish between Ayakulik and Frazer sockeye stocks; they did not attempt to distinguish between local Saltery stock sockeye salmon (Eastside District) and enhancement project production at Spiridon Lake (NW Kodiak District; west side). Are there other stocks that are difficult to distinguish? ADF&G also published a KMA Genetic Baseline report that contains many such statistics and graphic presentations. However, it is not clear to me, and may not be to any but the initiated, if there are KMA and UCI sockeye stocks that are so closely ‘related’ genetically, that there could be overlap or misidentification (i.e. Horse Marine sockeye salmon).

The study does not speculate on reasons for the observed variability in harvests between the three years. There are factors that could influence this and research could be directed at answering other important questions beside ‘How many?’ Funding has limited sampling by time and area, and stock similarity has limited the separation of at least three stocks, so this study cannot reveal the full picture over a robust set of years.

Do the results clarify or obfuscate issues relating to the use of this data or the controversy regarding KMA harvest of nonlocal sockeye?

The new KMA genetic MSA report authors believe that the study was successful: “These results represent a majority of sockeye salmon commercial harvests in KMA and should improve our understanding of stock productivity and migratory patterns, and provide information to evaluate assumptions built into management plans.” (Shedd, et al, 2016a, page 23; emphasis added).

Sufficient time should be given for ADF&G managers and researchers to utilize the limited data they’ve collected to discover its usefulness to actual fishery management needs.

We note that the 2014-2016 MSA report may seem incomprehensibly technical to some, but it is easy to seize on numbers! As written, this report is of questionable utility for BOF members for the purpose of a specific discussion of issues that could lead to restrictive regulatory changes to



KMA salmon fishery management, let alone stakeholder understanding, interpretation, and education. We do not mean to diminish the work done; the report is a fine piece of Scientific Reporting, and meets ADF&G standards for technical publications.

The 2014-16 MSA report is fine for a scientific audience, not as the basis for stakeholder discussions or restrictive BOF actions that would destabilize the KMA fisheries. For concerned stakeholders, and the BOF, it is more likely to lead to misunderstanding, and raises more questions than answered. People want to jump on numbers, but may miss the limitations.

We feel this technical study and report should only serve to provide limited information on a limited study. It should be the impetus and basis for a further report to BOF, if the BOF determines that further review is needed at this time.

The study results alone are not sufficient for restricting KMA fisheries to potentially re-allocate sockeye salmon harvests; an additional more comprehensive report on the specific issue of Cook Inlet salmon within the KMA should be considered to educate and inform stakeholders and begin discussions, prior to Board action.

Any such additional document would need to include a thorough discussion of issues (not stats, not methods, etc.) in more digestible form. A more colloquial summarization, perhaps formulated by a joint stakeholder committee, would best serve if further discussion of nonlocal salmon harvest in the KMA is to become a Board of Fisheries agenda item at 'Special' meetings or the next regular Kodiak Finfish meeting.

The intent, goals and objectives of the new MSA study and report are shown within the report. Caution must be taken against misuse the data provided based on personal concerns.

It was not the intent and goal of the new MSA to produce specific information for a BOF review of KMA fisheries, nor was it to suggest restriction of the KMA fishery due to reported UCI sockeye harvest numbers. And the new MSA study and report's goal was certainly not to open another allocative dispute, though that outcome could have been predicted and may have been prevented by additional analyses.

INTENT: When reviewing a scientific study, it is vital to bear in the forefront of one's mind the general intent or purpose of that study, its specific goals and objectives, as well as the assumptions and limitations that encompass any analyses. It may be difficult, even dangerous, to try to draw answers or conclusions from information that was not collected specifically to answer that question, or which has many poorly founded assumptions. The possibility for misinterpretation, misuse and mistakes are increased. False assumptions or misinterpretation of data can lead to completely inaccurate conclusions.

The KMA sockeye genetic MSA study (or indeed any study) and the report should primarily be viewed through the lenses of the intent, or purpose, of the study. What was the intent of study planners and report authors? What was it needed for and why? What did it seek to show or do?



What issues or what answers were beyond the scope of the study? Attention to intent, goals and objectives will inform us what the results may actually demonstrate.

Unfortunately, the intent of the new MSA study is not clearly defined in the early portions of the report, but rather is found scattered throughout the report. In the acknowledgements comes the most basic purpose of this study. Authors thank a former ADF&G Director for “prioritizing department resources to address this knowledge gap in KMA” (Shedd, et al, 2016a, page 27; emphasis added).

Genetic stock identification for Mixed Stock Analysis has been completed for much of Western Alaska (WASSIP), and GSI has been used in Cook Inlet since 2005, to identify the mixed stocks within UCI fisheries. No such genetic data existed for the KMA (a knowledge gap), so a Kodiak salmon genetic MSA was funded.

PLEASE NOTE: the MSA of Cook Inlet fisheries show NO nonlocal salmon, not because only local stocks are present... it appears that nonlocal stocks are NOT part of the UCI MSA model. That is, researchers assume that there are NO nonlocal salmon in Cook Inlet fisheries; nonlocal sockeye are not looked for! You can't find what you don't look for.

In other places in the new MSA report we find additional comments regarding intent. The authors state that: “The impetus for this study was to provide analytically sound estimates of stocks harvested in KMA fisheries to better understand stock productivity and address management assumptions. The principal objective of this project was to sample the major directed sockeye salmon commercial fisheries in marine waters of KMA.” (Shedd, et al, 2016a, page 23).

Unfortunately, what the authors meant by “management assumptions” is not defined within this report; if that was a serious consideration by study developers and planners, then those assumptions should have been clearly defined. All assumptions of specific scientific research, particularly if they are to be tested in the study, should be clearly stated. The need to address management assumptions, if not defined, should not be a focus for use of data collected.

As former Kodiak Area Management Biologists, we know of no ‘management assumptions’ that would require a three year genetic study. Indeed, as managers we know that limited research is too often misused and is commonly taken ‘too far’ by strongly opinionated people in attempts to prove their point.

In another passage the authors state that: “While nonlocal harvest of sockeye salmon in KMA commercial fisheries has been assumed in regulation and demonstrated in previous studies based on tagging, scale pattern analysis (Barrett and Swanton 1991, 1992), or average weight (Vining 1996), this project represents the first effort to use modern MSA techniques to quantify that harvest” (Shedd, et al, 2016a, page 26; emphasis added).

The primary intent was to use newly provided funding for a ‘first effort’ to try genetic stock identification methods in a Kodiak MSA, since no GSI had been attempted prior to 2014.



STUDY GOAL or PRINCIPLE OBJECTIVES: The report authors specifically define their goal: “The overall goal of this project is to provide information that will be useful for reconstructing runs, building accurate brood tables to define escapement goals, and refining management by identifying spatial and temporal harvest patterns of local and nonlocal stocks....” (Shedd, et al, 2016a, page 5, emphasis added).

Unfortunately, this goal has NOT yet been met. Satisfactory completion of the stated goal will require additional time and analysis of the gathered information.

It is important to give ADF&G time to actually apply these results to run reconstructions and brood table development. ADF&G may then be able to refine pre-season management by providing better predictors of stock productivity and anticipated run strengths (forecast). Inseason fishery management will not be improved.

It truly seems that there is an intent to reverse the order and to change management based on a limited study, rather than explore the statistics to see if solid, scientifically valid results point to needed changes in established, stable management. The possibility exists for future analysis and study, additional research, discussions between stakeholders and managers, researchers, and the BOF. We encourage the BOF to take this opportunity, and to use this study as intended. We fear a hasty, knee-jerk reaction to an emotional issue to appease a vocal user group.

The principle objective has been addressed, yet not fully met. “The principal objective of this project was to sample the major sockeye salmon commercial fisheries in marine waters of KMA from June through the end of August and use genetic mixed stock analysis (MSA) to estimate stock compositions. The study only partially accomplished this objective. KMA harvest samples have been collected and analyzed using the most current genetic MSA techniques. However, the project was not able to sample all KMA commercial fisheries, and so was limited to specific geographic areas, within specific time strata, for a limited number of years.

ADF&G study planners and authors agreed, with authors stating that: “these results may only have limited utility in formal run-reconstructions for 2 primary reasons. First, not all fishing areas were sampled, and sampling did not include harvest after August 29, when substantial numbers of Karluk and Upper Station late-run fish can be harvested. Second, the genetic baseline was unable to adequately distinguish between Ayakulik and Frazer stocks for the purposes of MSA.” (Shedd, et al, 2016a, page 26).

To meet the study’s goals, it would appear that there is a need to work further with the information gathered, in run reconstruction (back-casting, to improve fit of forecasting models) and escapement goal review. Authors caution: “Management would benefit from estimates of stock-specific harvest of Ayakulik and Frazer stocks and future research should explore means to accomplish this objective (Shedd, et al, 2016a, page 24).

There needs to be further analysis of the Ayakulik/Frazer samples to either separate or determine and apply additional information needed to split this grouping into the two distinct stocks.



Four (4) objectives are then specifically listed, 1 through 4, yet these objectives address the report, not the study. The stated objectives for the report that describes the study are:

- 1) Describe sampling of genetic tissues from sockeye salmon caught from June through August in select commercial fisheries in the KMA, 2014 2016;
- 2) Describe subsampling of genetic tissues in proportion to catch within sampling areas and temporal strata;
- 3) Report MSA results of stock proportions and stock-specific harvests of sockeye salmon sampled from select commercial fisheries in the KMA, 2014 2016;
- 4) Characterize where stocks were harvested from select commercial fisheries in the KMA, Shedd, et al, 2016a, page 5)



AN IMPERFECT DESIGN

The new MSA study design left many pertinent questions unanswered and many data needs unmet. The study design seems practical for the general overall goal; that is, during some portion of KMA commercial salmon fishery, to collect samples from some portion of the KMA salmon fisheries and analyze for genetic MSA stock identification, over three years.

Unfortunately, it was not designed to address or answer some very fundamental questions that could enlighten the issue of variable incidental harvest of Cook Inlet sockeye in KMA fisheries. As shown previously, the study did not include the North Shelikof Straits. However, it is possible that, with additional sampling, analyses or interpretation of results, more definitive answers or conclusions could be made that would be helpful to the BOF during their consideration of this ongoing fish fight.

The BOF has attempted to ‘solve’ this issue in the past. After 4 years of ACRs and proposals at every Kodiak Finfish BOF review, in 1994 the BOF formed a Work Group to determine possible solutions.

In 1994, a Kodiak / Cook Inlet Inter-Area Work Group (hereafter referred to as the IAWG or the Work Group) was formed by the BOF. As previously stated, in 1988 following the occurrence of a large harvest of nonlocal sockeye salmon in mid-stream Shelikof Strait, the active allocative dispute between Cook Inlet and Kodiak fishermen gained strength. From 1988 through 1996, Kodiak ADF&G conducted sockeye stock identification studies (MSA). Cook Inlet-Kodiak allocative conflicts were the subject of many meetings with the Board of Fisheries. The IAWG met several times prior to reporting to the BOF at a Special Meeting in March 1995.

At the beginning of IAWG discussions, ADF&G researchers and managers, Work Group stakeholder members, and the BOF members mutually agreed upon several key ‘facts’:

- The bycatch of Cook Inlet-bound sockeye in KMA fisheries is directly proportional to Cook Inlet sockeye run strength;
- The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years;
- The incidence of Cook Inlet salmon in KMA fisheries is ‘insignificant’ if the Cook Inlet sockeye run is less than 4 million;
- The July 6-25 period is not only an important time period in KMA salmon fisheries management, it is the period of PEAK abundance of Cook Inlet-bound sockeye salmon in KMA waters;
- Within that period, the majority of bycatch occurs within a narrower, 7-10 day period.

These facts were established by ADF&G and stakeholders on the IAWG, based on the 1988-1995 Kodiak MSA studies and fisheries. These facts served the BOF and ADF&G by focusing the scope of research and discussions to a manageable level and by focusing any potential Board action on the most effective time period within the fishing season.



The 1994-95 Inter-Area Work Group also recommended that ADF&G undertake additional inseason stock-separation studies and develop inseason indices or markers to determine when Cook Inlet salmon are present in KMA fisheries. The IAWG asked that Kodiak and Cook Inlet ADF&G estimate timing and percentage of Cook Inlet run present.

Other serious limits to the Kodiak sockeye genetic MSA include:

GEAR SELECTIVITY could have biased many of the genetic MSA samples. The geospatial strata included 2 location in the Central Section (Uyak and Uganik/Kupreanof), where both Set Gillnet and Seine gear are legal to operate. Based on concerns for getting ‘pure’ samples from these specific locations, the samples were collected from fixed set gillnet gear. Gillnets will select for the larger fish. In both 2015 and 2016, average sockeye sizes were lower than average, which would further bias against the smaller, local Kodiak sockeye. Karluk sockeye are the dominant stock, so these locations represent the major sockeye fishery of the KMA. Yet, the MSA study does not even mention gear type in the discussion of genetic sampling.

TEMPORAL STRATA used in the 2014-16 KMA genetic MSA do not readily correspond with actual KMA management plan fishing periods, which includes an important mid-season management period (July 6-25). We also feel the time periods used for this study are not sufficiently narrow to define periods when Cook Inlet sockeye stocks may be in the KMA and vulnerable to harvest.

Temporal strata were not consistent among the three years of the study, and the use of different and changing mid-season temporal strata effectively muddles the comparative usefulness of the data presented. During 2014 and 2016 the middle strata dates were June 28 through July 25, and in 2015 this was shifted to July 4 through August 1. While we recognize that, in some years, run timing may be delayed, pushing the mid-season temporal stratum by 7 days based on someone’s perception of run timing also confounds interpretation of the study results and their potential use for regulatory discussions. The KMA regulatory Salmon Management Plans all use calendar DATES that do not shift based on perceived run timing.

Anecdotal, first-hand knowledge shows that the location of harvest of larger, suspected Cook Inlet sockeye are almost ephemeral... here today, gone tomorrow. More relevant to CIMA-KMA allocative issues might be the selection and achievement of specific numbers of genetic samples during narrower time periods that correspond to how KMA fisheries are actually prosecuted, particularly during the July 6-25 time period.

GEOSPATIAL STRATA employed in the KMA genetic MSA report are overly broad, and the ability to determine potential offshore or cape fishery “hot spots” was lost. This could lead to misrepresentation. For example, Alitak sampling did not include set gillnet areas and combined the inside (inner bay) and outside (cape or offshore) seine fisheries; it was meant to be representative of the entire Alitak District harvests. However, even limited information about more specific harvest location is of interest and could be important in understanding stock compositions, timing and migratory patterns in KMA mixed stock fisheries.



DATA POOLING may also obscure important or essential information. The manner in which samples were later subsampled and data was pooled to fit temporal strata affects how the sample data can be used. Within the 2014-16 KMA genetic MSA report, there is no commercial fishery data given beside sample date, sample and subsample size, and the reported KMA sockeye catch from that particular sample was from a Seiner or Gillnetter. Effort data is lost.

Caution must be taken in use of the KMA genetic MSA data. Again, we feel that since the study was limited by its intent and goals, by funding, by MSA and study design shortcomings, and was not designed to answer the known and important questions regarding Cook Inlet sockeye in KMA salmon harvests, such as above, then it would be very unwise to apply this new data other than as intended.



DOES THE GENETIC MSA CREATE MORE UNCERTAINTY OR LESS?

The 2014-16 MSA report provides good presence/absence data, and provides MSA composition estimates for some geographic strata and/or time periods previously either unsampled or found to have insignificant or undiscernible levels of nonlocal sockeye. The report simply presents data, with little interpretation, leaving that to the readers. However, to fully explain the harvest numbers, there are many additional considerations (which we hope are becoming clearer after our review).

Presenting snapshots of fishery harvest stock compositions does not elucidate why or how those levels of harvest may have occurred. Is it due to targeting, or some unusual environmental factors? The 2014-16 MSA report does not show actual fishing time during periods in question... Was commercial fishing effort in high catch stratum due to targeting? Did participation increase following some initial 'event'? Would the effects of actual 2014 to 2016 management actions (Emergency Order-based fishing time) and commercial fishing effort point to a 'problem area'?

It should be fairly easy to disprove beliefs that there is a targeted interception fishery on Upper Cook Inlet sockeye in KMA fisheries. Yes, salmon fishermen target sockeye salmon, due to market demand and price, but KMA fishery managers and fishermen are not conducting a secret fishery within KMA salmon fisheries. A pairing of sample collection and estimated stock composition data with actual hours of fishing time and number of landings would show the incidental nature of nonlocal sockeye harvests.

The current KMA salmon commercial fishery management 'harvest strategy' relies on a period during July (July 6-25) when fishing periods targeting pink salmon are weekly 'pulse fisheries' with limited hours of fishing time allowed each week. Pink salmon numbers increase almost exponentially during this time period, but fish QUALITY remains good. After July 25, management sections may be opened for longer weekly periods only in sections where production is expected to be in excess of escapement needs. Management during the July 6-25 mid-season time period actually reduces potential bycatch of nonlocal sockeye. We feel that is an important consideration.

Similarly, without consideration of all factors, some may believe that KMA salmon stocks could all be harvested within 'terminal' fishing areas or 'inside the capes'. Long experience has shown that allowing salmon to enter the fresher (less saline), warmer, inside-waters of the KMA will very quickly lead to loss of quality, or to complete loss to the fishery as the fish home-in and refuse to move out of closed water sanctuaries.

Without consideration of all factors, we cannot answer truly important questions (i.e. Why is there such variability in estimated nonlocal contribution to KMA salmon harvests, between and among years, time strata and geospatial strata?) This could be a topic requiring much study to fully elucidate.



The depth and complexity of the issues involved requires extensive analyses and discussions between ADF&G authors and managers and interested stakeholders, just to set the ground rules for further review and evaluation of proposed restrictive BOF actions. We feel this cannot occur in a few months, but will require additional time for all parties to become apprised of important considerations which may not be apparent to someone not intimately familiar with both KMA and Cook Inlet fisheries and the issues at hand.

We feel that there has always been some level of nonlocal sockeye salmon harvests in KMA salmon fisheries; KMA is a mixed stock fishery. This is an annual part of the KMA salmon fishery harvest, not an aberration or an unanticipated consequence or a new and expanding targeted 'interception' fishery. Identifying the 'natural' background level of harvest of nonlocal salmon would allow for the identification of new or expanding fisheries on nonlocal sockeye salmon versus historical fisheries of the KMA.

If 'reallocation' of some portion of the KMA salmon fishery harvest is to occur (restricting KMA fisheries with the HOPE to positively influence the harvest in UCI) then a lot of information needs to be clearly elucidated in a comprehensive report to the BOF. We offer a limited list of questions that we would like to see addressed prior to any BOF action.



EVALUATION OF APPLICATION OF THE POLICIES OF THE ALASKA BOF

MIXED STOCK FISHERIES POLICY

In March 1993, the Alaska Board of Fisheries (BOF) adopted a significant policy into regulation, The Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220; effective 5-29-1993). The Mixed Stock Fisheries (MSF) policy created a framework through which the BOF could analyze specific Alaska salmon fisheries with the goal of determining if Board action is appropriate and required to conserve and protect the salmon stocks in question. With this policy in regulation, any proposed change in the salmon fishery regulations or Board approved Management Plans, is to be judged against the criteria established in the Mixed Stock policy.

In fact, the 1988-1992 allocative disputes between the sport and commercial fishermen of Cook Inlet and the commercial salmon fishermen of the KMA were the ‘backdrop’ during the discussion and adoption of the Mixed Stock Policy into regulation.

The first use (test) of the MSF Policy following its adoption by the BOF (March 1993) was yet another petition from Upper Cook Inlet stakeholders seeking to control the harvest of Cook Inletbound salmon in KMA salmon fisheries; that petition failed.

It is important to evaluate each of the MSF policy’s elements, and those of the associated findings (93-07-FB), against the best available information regarding the Kodiak salmon fishery, the associated take of Cook Inlet sockeye, and the status of Cook Inlet's sockeye stocks.

Pertinent sections of the MSF policy and our evaluation include:

- (a) In applying this statewide mixed stock salmon policy for all users, conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority”

For UCI sockeye salmon, conservation and sustained yield, the highest priorities under the Mixed Stock Policy, are not threatened. This leaves allocation as the major consideration left, and any BOF actions must abide by established allocation criteria.

- (b) In the absence of a regulatory management plan that otherwise allocates or restricts harvests and when it is necessary to restrict fisheries on stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in their respective harvest on the stock of concern”
close proportion to

There is an allocative management plan in place that allocates and restricts harvest, the North Shelikof fisheries management plan.

Further, no conservation problem has been shown for Cook Inlet sockeye stocks (Susitna Sockeye are a Stock of Yield Concern, not Conservation Concern). KMA commercial salmon fishermen currently bear a burden of conservation which protects an unknown proportion of nonlocal salmon within KMA waters and fisheries. Would additional restrictions actually help in possible future conservation concerns? We feel the BOF should not be restricting fisheries

and reallocating historic harvests of nonlocal salmon in the absence of a true Conservation Concern. We feel that much additional discussion is needed to begin to define and answer such questions.

(d) Consequently, the board will restrict new or expanding mixed stock fisheries... Natural fluctuations in the abundance of stocks harvested in a fishery shall not be the single factor that identifies a fishery as new or expanding.

The KMA harvest of nonlocal salmon is neither new nor has it been shown to be expanding. In fact, the number of participants in KMA fisheries has significantly contracted (Figure 3). The KMA salmon fishery is old and contracting!

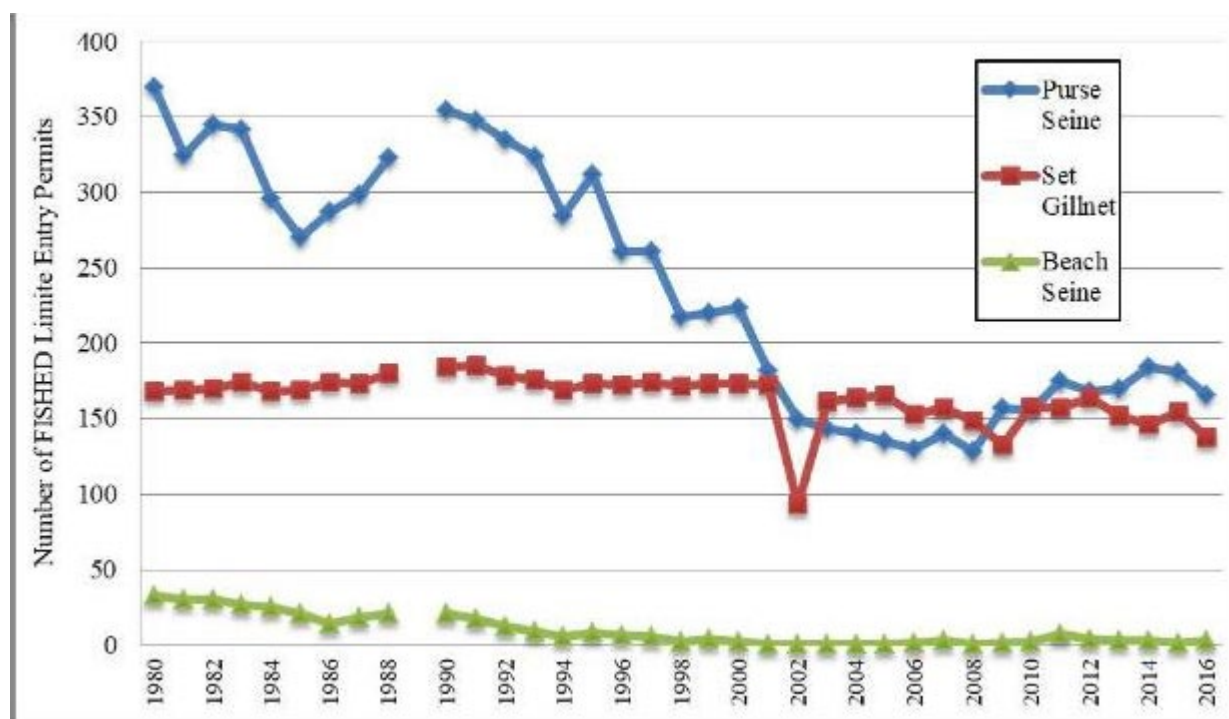


Figure 3. The number of Limited Entry permits actually fished for Kodiak commercial salmon fisheries, by gear type, 1980-2016. (No 1989 fisheries due to EVOS) Data from ADF&G, Kodiak.

For the 2014-2016 MSA study period, KMA set gillnet permit participation was down 22.5%, KMA purse seine participation was down 52.6%, and KMA beach seine participation was down 92.4% from the number of available permits to fish during those same three years.

A determination of the “natural fluctuation of abundance” of nonlocal salmon in the KMA is required in order to define any “new and expanding” fisheries in the KMA that target nonlocal sockeye salmon.



(e) This policy will be implemented only by the board through regulations adopted (1) during its regular meeting cycle, or (2) through procedures established in the ...Policy for Changing Board Agenda (5 AAC 39.999).

This issue must be tabled until KMA fisheries come up in the regular BOF meeting cycle. The criteria for changing the BOF agenda have not been met.

Past analyses of the harvest of Cook Inlet sockeye in Kodiak waters, using the accepted MSA at the time, have postulated that such bycatch is negligible when Cook Inlet returns are poor to average (Ruggerone and Rogers, 1994). Under conditions when conservation of Cook Inlet's sockeye returns would be a concern, it is not likely that any significant Kodiak bycatch of those sockeye would occur. You can't catch what isn't there.

The Board's Findings, associated with adoption of the Mixed Stock Fishery policy regulations, not only reiterate specific points of the policy but amplify and clarify the Board's intent outside of the constraint of regulatory language. Several of these findings apply to consideration of this Kodiak-Cook Inlet sockeye issue.

The Board found that Alaska's salmon industry appropriately relies upon stable existing fisheries, most of which harvest mixed stocks. Kodiak's established management program for the harvest and conservation of mixed stocks has been successful in sustaining and promoting Kodiak's century-old industry. The findings also speak to harvest of many mixed stocks with an eye towards QUALITY of the harvest, and management of KMA fisheries has promoted protection, rebuilding and high-quality harvests of a large number of stocks of salmon. To restrict fisheries to inside 'terminal' areas will lead to a significant decline in salmon quality, thereby significantly reducing the volume and value of KMA salmon fisheries.

KMA salmon fisheries are already managed according to a well-orchestrated series of management plans, none of which need to be amended now to account for harvests of fish that fluctuate on the basis of natural abundance and pose no threat to conservation. There is no indication that 135 years of commercial salmon fishing in Kodiak's waters ever posed any threat to Cook Inlet salmon stocks

SUSTAINABLE SALMON POLICY: The Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222; aka Sustainable Salmon policy), developed by the BOF, was adopted into regulation in September 2000. This policy greatly expands some of the same principles found in the Mixed Stock policy.

The policy updates and strengthens long-standing principles of Alaska's salmon management program. Most importantly, it directs ADF&G and the Alaska Board of Fisheries to follow a systematic process for evaluating the health of salmon stocks throughout the state by requiring ADF&G to provide the Board, in concert with its regulatory cycle, with reports on the status of salmon stocks and fisheries under consideration for regulatory changes (Clark, et al, 2006). The policy also defines a new process for identifying stocks of concern (stocks which have not met escapement goals or yield expectations), and requires ADF&G and the Alaska Board of



Fisheries to develop action plans to rebuild these stocks through the use of management measures, improved research, and restoring and protecting habitat.

The Sustainable salmon policy is a long and very complicated policy, and we will not attempt to review KMA nonlocal salmon harvests through all of its many parts. We will instead point out what we consider to be salient points that apply to the current issue.

The stated goal of the policy include not only conservation of salmon and habitat, and protection of subsistence and other customary and traditional uses plans, restricting fisheries to protect nonlocal salmon, would negatively change the economic health of Kodiak communities to a considerable degree.

The policy also provides many clear definitions for terms commonly used and newly developed terms or classifications. Of note is the definition of Stocks of Concern (SOC). As mentioned earlier, the Susitna sockeye salmon stock was listed as a Stock of Yield Concern in 2008. Yield chronic inability, despite the use of specific management measures, to maintain expected yields, or harvestable surpluses, above a stock's escapement needs; a yield concern is less severe than a management concern, which is less severe than a conservation concern". Based on that definition, there is NO conservation concern for Susitna sockeye salmon.

The policy dictates that an Action Plan be developed for SOC action. Such plans "should contain goals, measurable and implementable objectives, and provisions" including "fishery management actions needed to achieve rebuilding goals and objectives, in proportion to each fishery's use of, and hazards posed to, a salmon stock" and "a research plan as necessary to provide information to address concerns".

The Action Plan for Susitna sockeye salmon, as prepared by ADF&G and approved by BOF through at least three BOF meeting cycles (over 9 years), contains NO mention of concern about Susitna salmon harvest in adjacent Areas (Kodiak) nor the need to further investigate (through research) possible nonlocal harvest. There is no concern of sufficient importance to even consider nonlocal harvest, let alone restriction of KMA salmon fisheries.

In fact, restriction to address the SOC status of Susitna sockeye salmon are limited to Northern or Central District salmon fisheries. No ADF&G management actions are taken in Cook Inlet salmon fisheries in the more southerly districts of the Cook Inlet Area (including Kamishak, Southern, Eastern and Outer Districts). The VAST majority of Susitna salmon MUST migrate through those southerly districts.

How could a restriction to KMA salmon fisheries, where some unknown portion of the Susitna sockeye run may sometimes migrate in unknown patterns) even be considered?

Deferral of ACRs and potential BOF regulatory action until the regular meeting cycle for KMA (and UCI) salmon fisheries is supported by our analysis of application of other BOF policies and criteria. This issue should be addressed within the BOF regular schedule for consideration of Alaska salmon fisheries, during the 2019/2020 cycle.



CONCLUSIONS

Importantly, not included in the new 2014-16 MSA report is any discussion of the incidence of KMA sockeye salmon in Cook Inlet or Chignik salmon fisheries. We learn in elementary school that we should first balance an equation in order to solve it, and working with unequal factors will lead to skewed solutions. The KMA is nestled between the Cook Inlet and Chignik management areas. Early tagging studies sought information on stock of origin as well as migration patterns and timing.

Management plans defining fishing opportunities on KMA local stock were developed by stakeholders, Management Biologists at ADF&G, concerned representatives of government and scientific agencies, and many prior Alaska Boards of Fisheries, over the course of many years. Discussions and decisions were made with full knowledge that KMA was a mixed stock fishery and that significant numbers of both Chignik and Cook Inlet sockeye will be found and may be harvested in KMA fisheries.

Nowhere in existing Alaska Statute, regulation, policy, or management plan does it allow for decisions based on political expediency or personal bias. Allocative pressures within Cook Inlet salmon fisheries are very real, very large, and are growing. The establishment of BOF findings is needed, clarifying the extent to which Inter-Area allocative disputes may be used to modify long standing regulatory structure. Without a definitive pronouncement that x number or percent of nonlocal salmon are harvested, either generally or by stock of origin, then allocative fish fights will be waged.

It is impossible to maintain the economic success of a fishery that is subject to capricious reduction based on poor information or colloquial opinion. A Board finding that historic KMA harvest may contain x% of salmon from Cook Inlet and x% of Chignik salmon will allow determination of new or expanded fisheries and sound allocative decisions.

The 2014-2016 MSA report is a technical report and maximum opportunity needs to be given for this report, and all other pertinent data, to be interpreted for stakeholders and interested parties. It's written in a format that makes ready understanding difficult for those uninitiated in modern genetics research. The format of the report does not lead to easy consumption. It's long on methods, techniques, statistics and data (a data dump from a three year project) and short on analysis.

All parties would benefit from time spent discussing the report, finding answers to questions that it brings up, seeking information from ADF&G or others, educating and discussing pertinent issues with as many stakeholders as possible, defining problems (from the most obvious to the minute), defining possible and favored BOF actions, refining arguments (both for and against), and educating the public. All this should occur PRIOR to full BOF review and deliberation on potential regulatory actions. Another document, more comprehensive and written for BOF and Stakeholder consideration, would be helpful and should be drafted with clearly defined issues and goals, all available data, lists of possible actions and repercussions, as well as the potential of success of proposed actions under the defined goals.



This issue, while not new, is unique and very complex. The new 2014-16 MSA only represents another piece of the larger puzzle. Representative and informed decision will require different /more information and involves further discussions with and between ADF&G and stakeholders. Stakeholders need background and education. They need to narrow their concerns, look for common ground, identify issues and potential problems, review possible actions to deal with the identified issues, and then suggest to the BOF a range of possible actions and recommendations, if needed.

There is potential for additional analyses or even additional research studies that would better inform the issue. We urge caution, and with no immediate biological conservation issues we urge the BOF to postpone or deny any regulatory limitations to the KMA salmon fisheries at this time.

It is a broad truth that Mother Nature has allocated nonlocal salmon to Kodiak salmon fisheries. It cannot be predicted, nor can it be identified inseason or postseason, without a recurring annual MSA. The effects of restricting KMA fisheries to limit nonlocal sockeye harvests on CIMA sockeye escapement or harvest cannot be identified or quantified.



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

December 27, 2019

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

RE: UCIDA Proposals 65 & 66 (inclusive of proposal 64)
Proposals 37, 63 and RC-09.

Dear Chairman Morisky and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created to address the issues of Cook Inlet bound sockeye captured in the Kodiak Management Area and the continuation of the Cape Igvak Management Plan. Membership is open and encompasses seiners from both Kodiak seine organizations, setnetters from both Kodiak setnet organizations, beach seine permit holders and processors. In other words, all of Kodiak's salmon fishing community. The group is supported by voluntary stakeholder contributions including those from the City of Kodiak and the Kodiak Island Borough.

KSWG is herewith submitting several documents for the Board's review: 1. Structure and Function of the Kodiak Management Area Salmon Fisheries; 2. Review of Genetic Studies of Sockeye Salmon Harvests in the Kodiak Management Area; 3. Review of Shedd et al. (2016) by Geiger & Quinn; 4. Gulf of Alaska Climate Conditions and Sockeye Salmon Run Timing During 2014-16; 5. Overview and Contrast of Management Plans and Harvests of Sockeye Salmon Destined for Upper Cook Inlet, 2014-16; 6. Synthesis of Chinook Salmon Stock Contribution Estimates within the Kodiak Management Area Commercial Fisheries (Proposals 63 & 37); 7. Economic Analysis of Proposals 65 & 66; and 8. Comments on RC 09, an amendment to proposal 37. Informational maps are attached as well.



Presence of Cook Inlet Sockeye Stocks in Kodiak Area

Proposal 66:

Proposal 66 closely tracks former Agenda Change Request 11 which was submitted to the Board in April 2017 and rejected by the Board in October 2017. Several assertions by the proposers are incorrect. First, the proposer claims that proposal 66 is needed to “prevent a repetition of the nontraditional harvest pattern which occurred during 1988 and many years since. Next, the proposer states that “only recently, as the result of genetic testing and analysis, that the real magnitude of the harvest of Cook Inlet and other non-local salmon stocks in the Kodiak Management Area became known.” Then the proposer concludes that “this proposal (proposal 66) is a “first opportunity to look at the harvest of Cook Inlet stocks in the Kodiak Management Area”.

The “non-traditional” harvest pattern that occurred in 1988 and years prior was, in large part, an error regarding fishing in federal waters in Shelikof Strait. In addition, the Board concluded that there had been targeting of Cook Inlet bound sockeye in the North Shelikof Strait. The North Shelikof management plan clarified that all federal waters in the Shelikof Strait are closed to salmon fishing and further limited Kodiak’s seine fleet to cape to cape fishing throughout North Shelikof after small “trigger” amounts of sockeye are captured. Consequently, for the past 30 years it has been regulatorily impossible to repeat “the nontraditional harvest pattern which occurred during 1988”. The idea that the Kodiak fleet is new or expanding or harvesting in “non-traditional” patterns is a myth. See further, Structure and Function of the Kodiak Management Area Salmon Fisheries.

“Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014-2016” (Genetic Study by ADF&G) provided additional detail to information that was already generally known by the Department. However, the “study was not designed to understand migratory patterns of sockeye salmon through KMA, nor to address finer temporal patterns of non-local stock distribution.” See further, Review of Genetic Studies of Sockeye Salmon Harvests in the Kodiak Management Area, and Geiger and Quinn 2017.



The Genetic Study's authors (Shedd et al. 2016) state **“caution must be exercised when extrapolating the results to years, areas, and temporal periods not analyzed because changes in... migratory behavior due to ocean conditions very likely affect distribution of stock specific harvests among fisheries.”** Ocean conditions and climate variability add another reason for caution. “The rate of physical and biological change currently occurring in the Gulf of Alaska is unprecedented, and suggest the need for caution when re-evaluating long-standing management practices based on a few years of data” See further, Gulf of Alaska Climate Conditions and Sockeye Salmon Run Timing during 2014-16.

History is violated by claiming the proposal 66 is the “first opportunity to look at the harvest of Cook Inlet Stocks in the Kodiak Management Area”. The Board's records will show that the Board addressed the presence of Cook Inlet stocks in the Kodiak area from the early 1990s through at least 2006. Reports by Barrett and Swanton in 1991 and 1992, Vining and Barrett in 1994 and Vining in 1996 all calculated the amount of Cook Inlet sockeye captured in Kodiak. In addition to these stock assessments, task forces were formed and management plans were developed and several dozen proposals on the issue were reviewed by the Board. Throughout all these years, each Board concluded that the Board's Allocation Criteria did not justify additional regulations focused upon Cook Inlet sockeye harvests in Kodiak. One of the important aspects of the allocation criteria is the assessment of ‘cost’ or harm that would occur from regulatory change. If proposal 66 were adopted by the Board, Kodiak would lose over \$4.5 million dollars annually (See further, Economic Analysis of Proposals 58, 60, 61, 65 & 66.) with little measurable benefit to Cook Inlet. See further, Contrast of Management Plans and Harvest of Sockeye Salmon Destined for Upper Cook Inlet, 2014-16.

Economic losses in Kodiak greatly exceed potential economic gains in Cook Inlet. As one major processor has stated, “I cannot keep my plant open if the fishery is closed for several days during each of 5 weeks in late June or July. My fixed costs are too high and my processing workers can't afford to stay here.” Kodiak is a volume fishery that relies on ample fishing time. In contrast, Cook Inlet is a high value fishery that relies on spatial opportunity. Regulations that may work in Cook Inlet would have devastating impacts in Kodiak.



Proposal 65:

Cook Inlet fishermen seek absolute closure of salmon fishing in Kodiak's mainland districts west of Dakavak (outside of the N. Shelikof management plan) from June 28 to July 25th. Interestingly, this excludes about 75% of the historical Cape Igvak catch and keys in on a single year, 2016, when Cook Inlet fish "hit" at Cape Igvak. Nothing is known from the 2014-16 Genetic Study regarding the Katmai and Alinchak sections but the proposer must have determined that proximity to Cape Igvak equaled a justification for closure.

The author of proposal 65 did not mention that Kodiak's existing management plans restrict fishing in the Katmai and Alinchak districts during July to weekly openings of 57 hours. Clearly, fishing opportunity in these districts are focused on local stocks. The Genetic Study doesn't establish anything other than a single event at Cape Igvak. When the lack of information from the Genetic Study is paired with local stock catches of pinks, chums and coho, it becomes apparent that the area should be removed from further regulatory consideration.

The cost to Kodiak fishermen from a proposal 65 closure would average about \$1.09 million dollars annually. See further: Economic Analysis of Proposals 58, 60, 61, 65 & 66.

Chinook Concerns

These two proposals use concern for Gulf of Alaska Chinook salmon as a basis for seeking additional management restrictions in the Kodiak Management Area. Salmon fishermen throughout the Gulf of Alaska have been concerned about Chinook productivity for at least 15 years. Kodiak fishermen successfully lead the initiative to reduce Chinook bycatch in the GOA trawl fisheries. One of the first Chinook systems to show declines was Karluk. Initially sport fishing was restricted and then eliminated. Eventually, commercial salmon fishermen working with the Department volunteered to accept a regulation to return alive Chinook larger than 28 inches. Karluk has stabilized but Ayakulik's Chinook returns continue to be of concern. The focus of regulatory restrictions, however, should be rely upon a nexus between the restriction and the probability of



having an impact on the stock of concern. Neither Proposal 63 or 37 come close to establishing such a connection.

Proposals 63:

Much of rhetoric in proposal 63 is incorrect. For example, the presumption that Chinook catches would remain static in the KMA from 2011-13 to the 2014-16 time period ignores the proposers underlying thesis that Chinook salmon runs are diminishing. The author touches lightly on known Chinook genetic assessments (2014-2016) which correlate with several earlier studies and confirm that the proportion of Cook Inlet Chinook captured in the Kodiak area is very small. Smaller still is the “wild” component of Cook Inlet Chinook stocks, as Cook Inlet has a number of Chinook hatcheries.

Proposal 63 is asking that the Board impose a fishing restriction on the Kodiak salmon fleet that would cost in excess of \$1.0 million dollars annually in an attempt to save an unmeasurable portion of less than 1% of Cook Inlet bound wild Chinook. The solution for saving Cook Inlet Chinook should start closer to home just like the efforts to sustain the Karluk and Ayakulik fisheries are focused in Kodiak. A definitive assessment of the known proportionality of Gulf of Alaska Chinook populations in the KMA is found in Synthesis of Chinook Salmon Stock Contribution Estimates within the Kodiak Management Area Commercial Salmon Fisheries (Proposals 63 & 37)

Proposal 37 (RC-09)

The proposer asserts that Kodiak is “slaughtering” Chinook salmon that would otherwise be preserved in Cook Inlet. Apparently this proposer, like the author of proposal 63, was not aware of the very low number of wild Cook Inlet Chinook captured in the Kodiak area. He further makes an assumption that the open water gillnet fisheries in Kodiak are parallel to Cook Inlet gillnet fisheries located in proximity to Cook Inlet Chinook spawning streams. Apart from the fact that salmon are caught in both Cook Inlet and Kodiak, there is very little similarity between the two fisheries --- the fishing gear is different, the size of the area and the special geography is different, the weather in Kodiak, on the open ocean, is different, seasonality in Kodiak with of hundreds of spawning streams over 5 months is different, the abundance of non-sockeye species is different, numbers of



participants is far different as is comparative management success in terms of meeting escapement goals. Consequently, the idea of “paired management” seems misplaced.

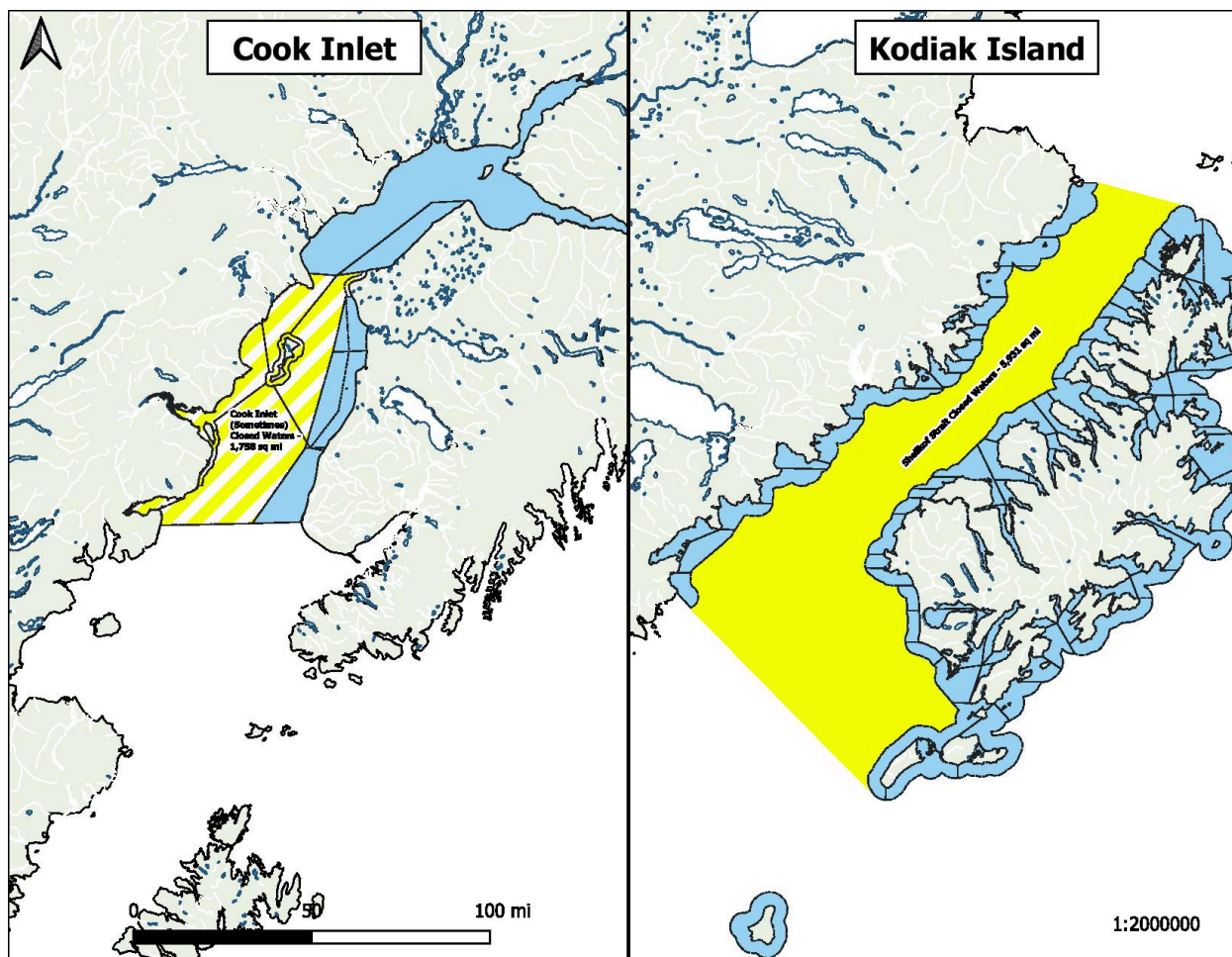
RC-09 created an opportunity for a single user group to insert a proposal in the Board’s process after the proposal deadline. The “new” proposal 37 absorbed an initial idea of joint management and expanded it both by species and geography with the specific application of fishery limitations to the Kodiak fishery. It appears that RC 09 is one user group’s solution in search of a regulatory vehicle. Starting with a problem statement, like “it doesn’t include Area L, Prince William Sound, or Southeast Alaska, recreational fisheries for Chinook, sockeye, coho, chum and pink salmon” would lead the reader to think that a suggested solution would include what the problem indicated was needed. However, the proposed solution is to modify management plans in Kodiak and Lower Cook Inlet ONLY – in other words, talk about something that is comprehensive but just regulate “those guys”, not us! The Board should see through the subterfuge. Also, the tables submitted with RC-09 are invalid. See further, Comments on RC 09, an Amendment to Proposal 37.

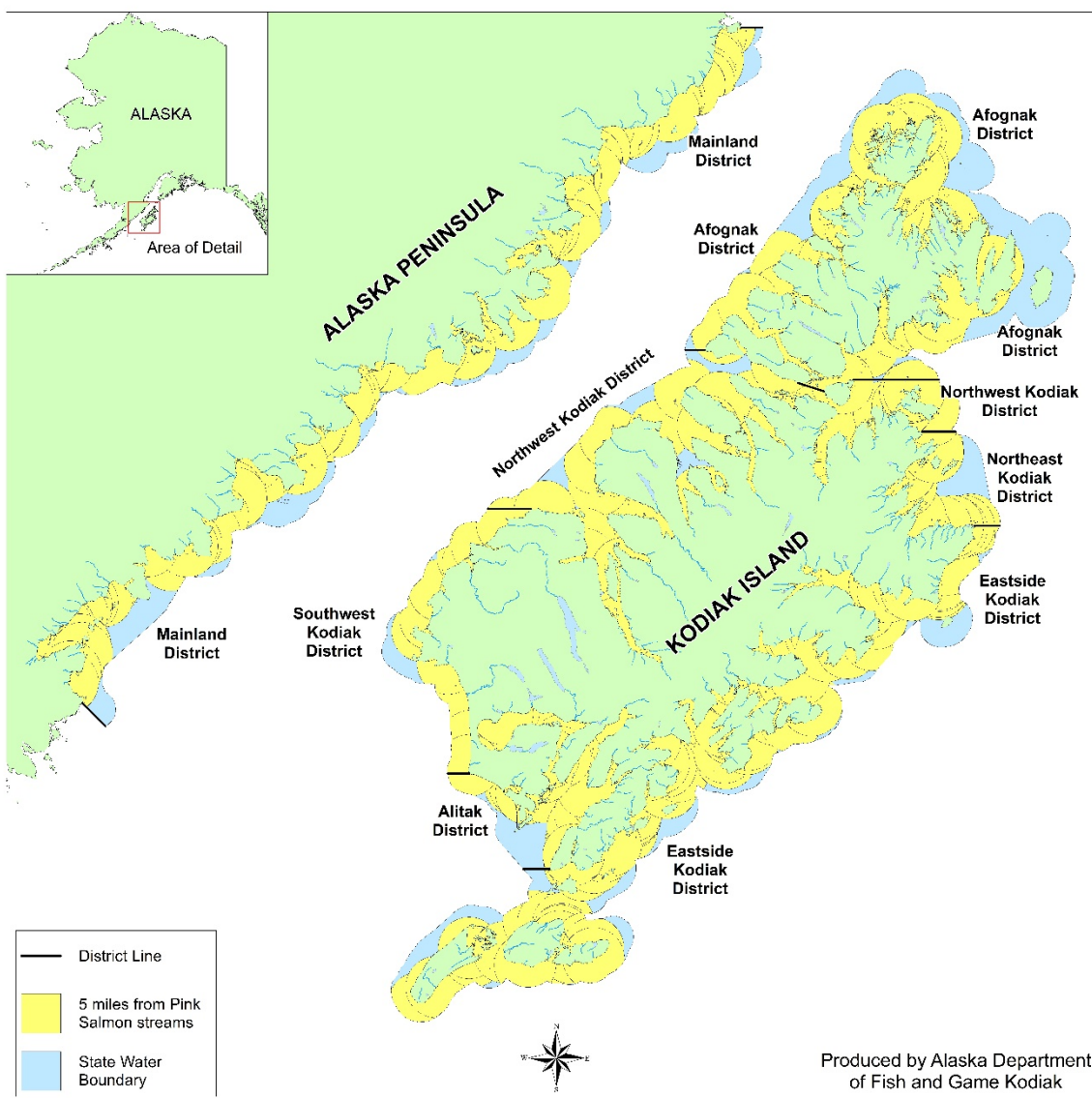
Conclusion

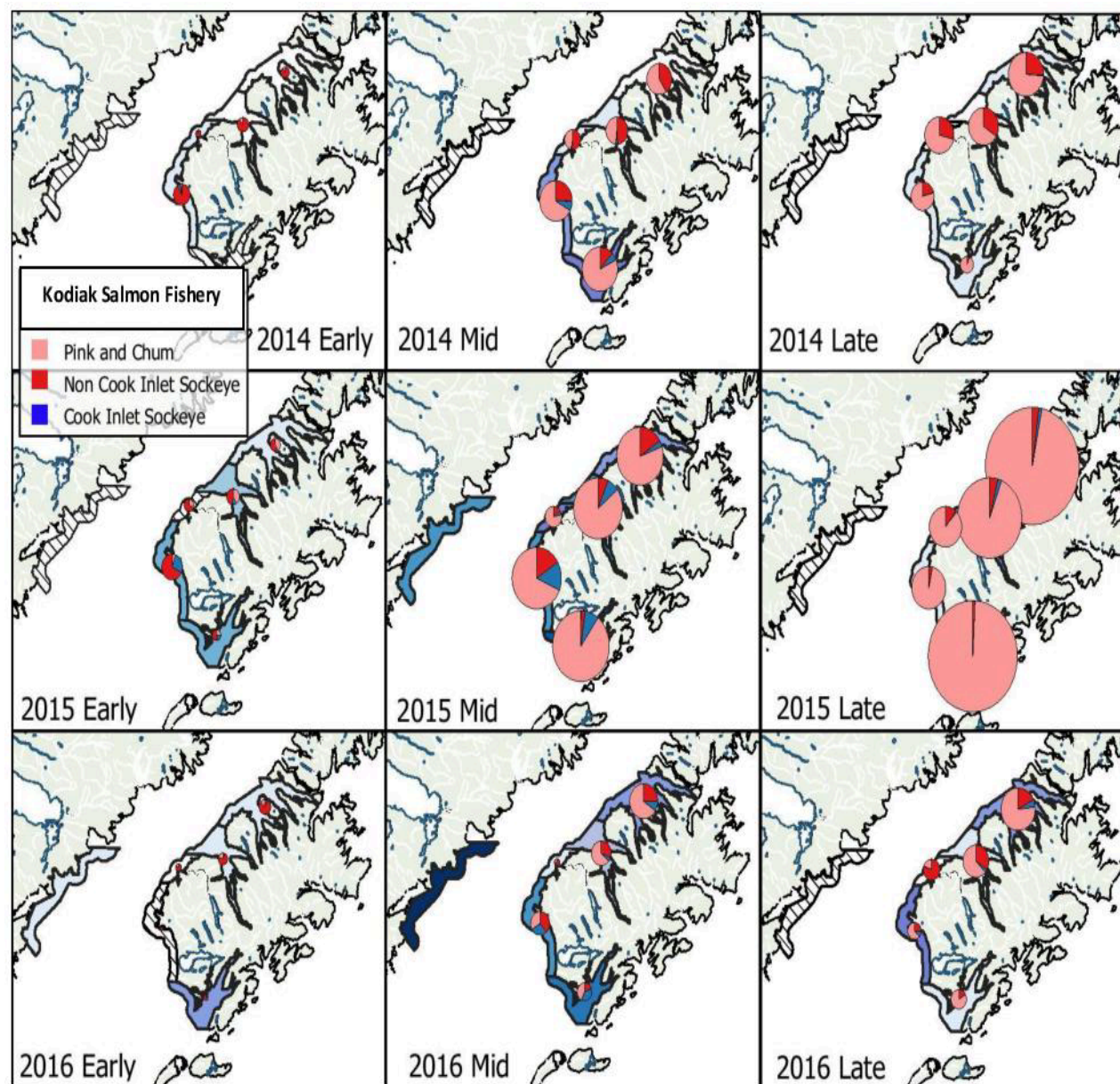
In summary, it is the position of the Kodiak Salmon Work Group that proposals to further limit Kodiak’s commercial salmon fishery based on the possible presence of Cook Inlet sockeye or Chinook salmon stocks in the Kodiak area should be rejected. We request that you vote NO on proposals 63, 64, 65, 66, 37 and RC-09. Kodiak salmon fishermen remain committed to work with the Board to solve real conservation issues with workable solutions. The five Cook Inlet proposals do not have a reasonable nexus between actual conservation and meaningful regulation.

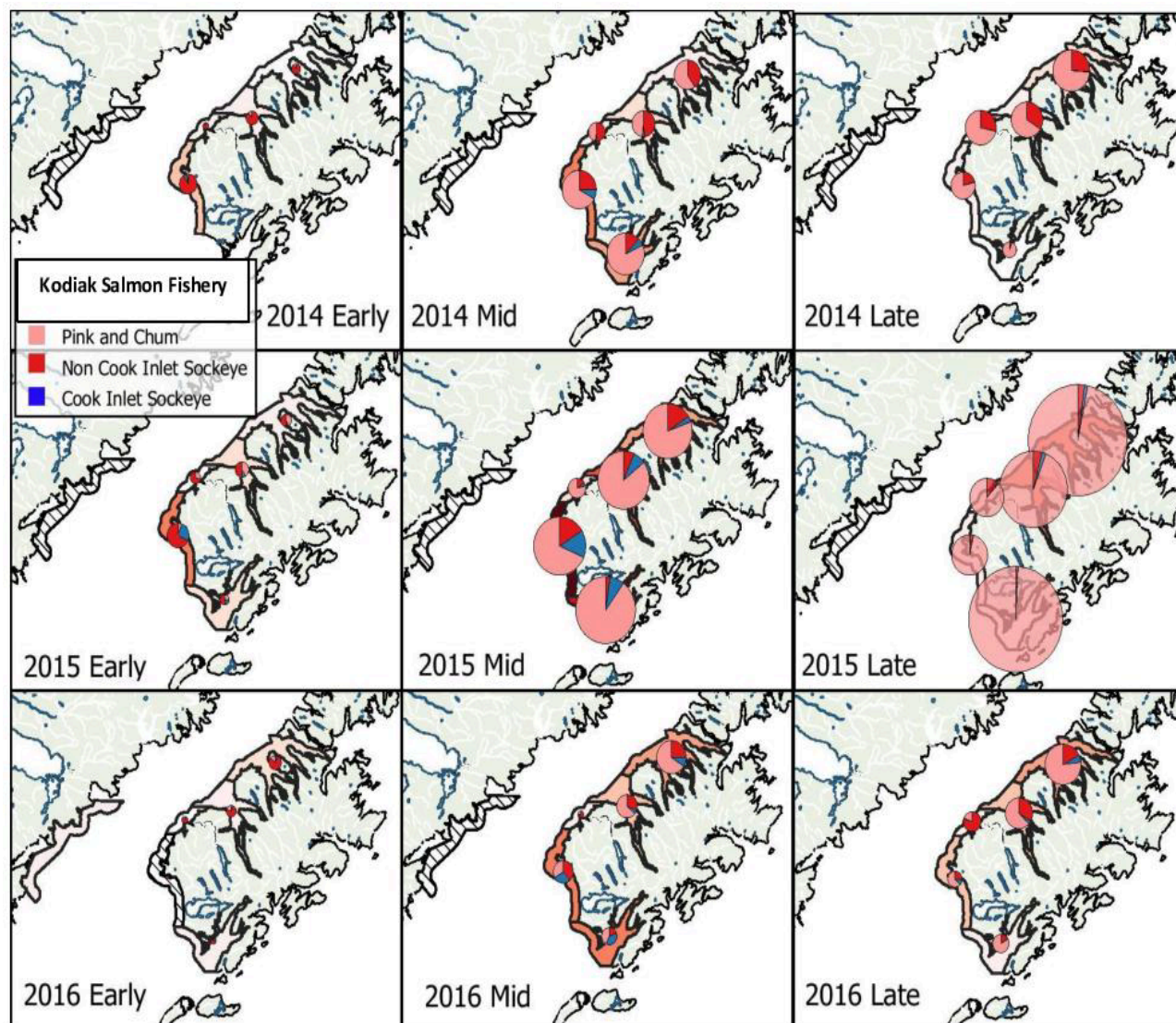
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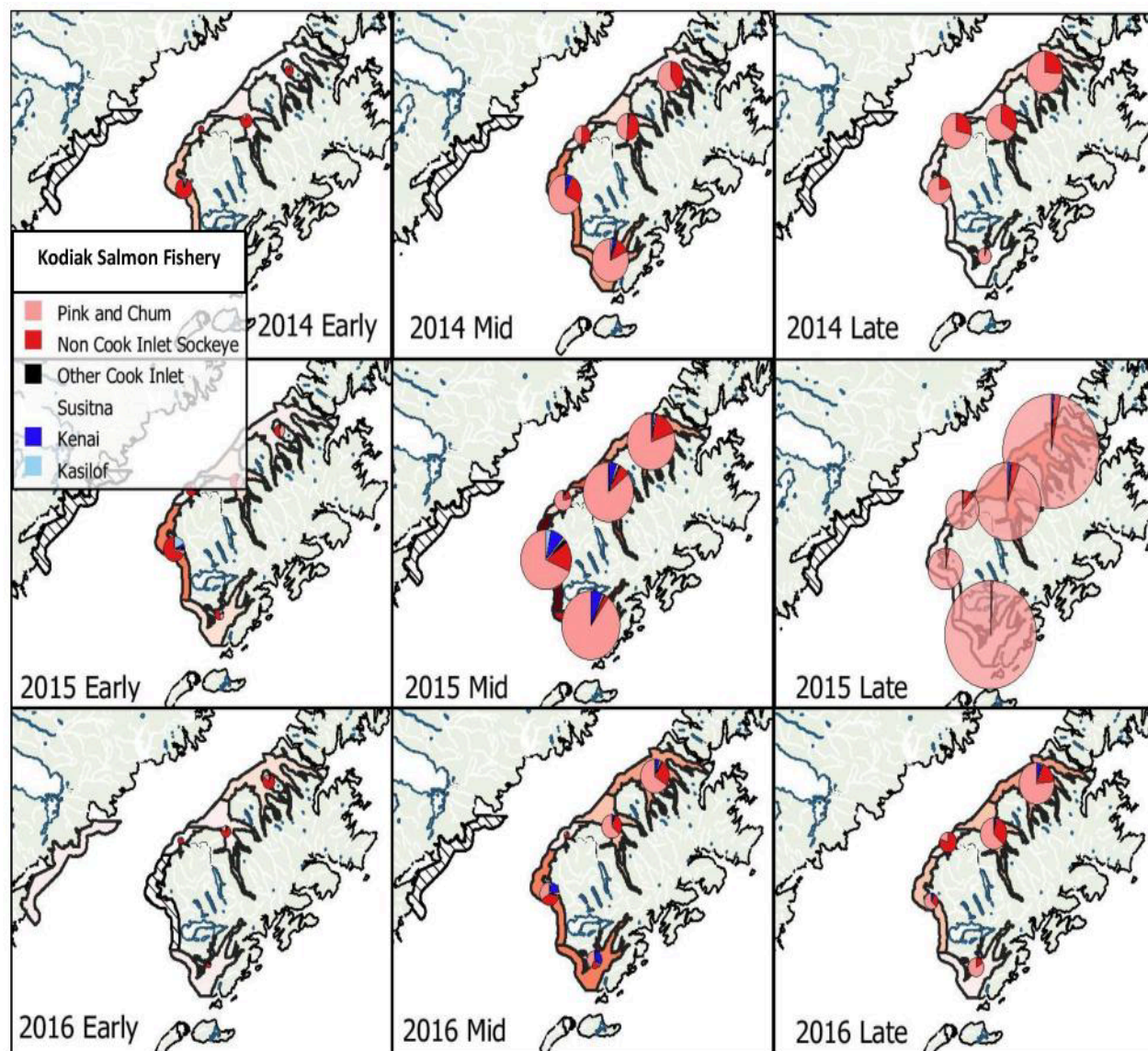
Duncan Fields, Chairman

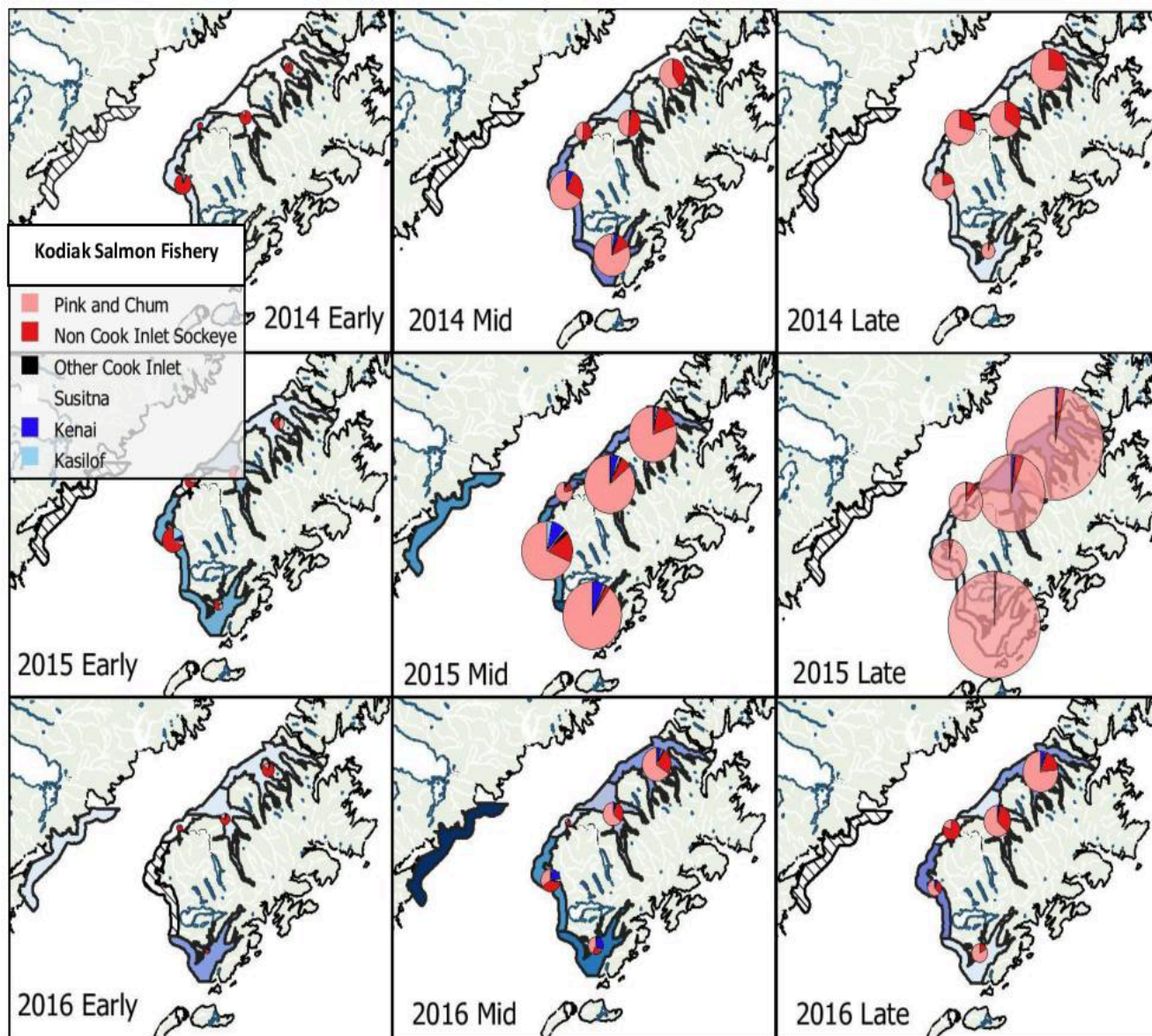


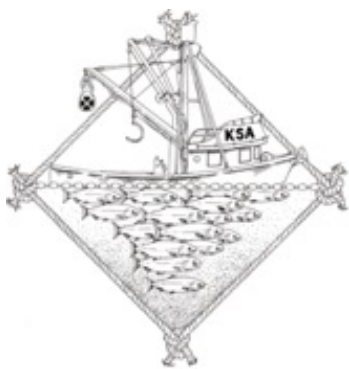












December 20, 2019

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

RE: Opposition to Ayakulik Proposals: 72,73,74,75

Dear Chairman Morisky and Board of Fish Members:

Thank you for the opportunity to comment on Proposals 72,73,74, and 75 in advance of the Board meeting for Kodiak Finfish. The Kodiak Seiners Association (KSA) respectfully requests you **oppose these proposals** as they pose a hindrance to the effective management and prosecution of the Kodiak Management Area (KMA) salmon fishery.

While KSA recognizes and applauds the author of these proposals in his conservation minded approach to king salmon runs in the Ayakulik river, we feel the Board should reject or take no action on these proposals, as it is our belief, they will not allow for increased passage of more king salmon to this system. Our membership recognizes and supports the direction of ADF&G in creation and management of the non-retention of king salmon in the KMA, as local runs of Chinook are weak, however the number of king salmon harvested in the Inner Ayakulik section are so low, we feel these proposals could actually backfire on their original intent. Given that the Outer Ayakulik section is managed for local Ayakulik sockeye, pink, and coho stocks, an increase in fishing time in the Outer Ayakulik section would have to incur in order for ADF&G to prevent over-escapement of the Ayakulik river, as a result of the inability of the Department to hold Inner Ayakulik, terminal fisheries, during times when large pushes of sockeye and pinks make their way through the area in excess of upper end escapement goals and congregate on the beach at the river mouth. The catch of king salmon in the Outer Ayakulik section in the past, has been roughly 7 times the amount caught within inner Ayakulik, therefore if you increase fishing time in the Outer section to prevent over-escapement, you create the potential for increased catch of king salmon rather than decreasing it.

We support a conservative management approach and hope that any decisions of the Board to address king salmon and rebuilding of stocks does not come with the negative consequence of over-escaped systems of sockeye and pink salmon, and difficulties for management to manage for maximum sustained yield of these species.

We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of regulations regarding our fisheries and trust that the Board will continue to apply consistency in designing regulation changes while applying the guiding BOF policies, such as the Management for Mixed Stock Salmon Fisheries, and the Sustainable Fisheries Policy.



Kodiak Seiners Association represents 157 members including the majority of actively fishing SO1K seine permit holders, in addition to local Kodiak and Homer based businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADF&G, the Board of Fisheries and our State Legislature.

Sincerely,

A handwritten signature in black ink, appearing to read "Nate Rose".

Nate Rose
KSA President

December 19, 2019

Alaska Board of Fisheries
1255 West 8th St.
P.O. Box 115526
Juneau, AK 99811

Re: Maintain Kodiak's Salmon Fishery Oppose Proposals: 37,58,59,60,61,62,63,64,65, &66

Cama'i (hello) Alaska Board of Fisheries,

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has approximately 4,100 Alutiiq Shareholders. Our region encompasses the Kodiak Island and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Koniag has been working on issues affecting viability and sustainability of the village communities of the Kodiak Archipelago and access to fisheries is a critical component of this effort. As such, Koniag opposes Proposals 37, 58, 59, 60, 61, 62, 63, 64, 65, and 66.

Kodiak's management plans cover the entire Island and the portion of the Alaska Peninsula that is in the Kodiak management area and they only allow fishing openings based on the presence of local stocks. These plans have been in place for more than 25 years and have precluded expansion of salmon fishing that is not based on the presence of local stocks. Kodiak's salmon fishery has not expanded, in fact there are fewer permits fishing now than ten years ago.

Koniag is concerned that issues with returns in other areas and/or user conflicts in fisheries in other management areas have led to these proposals. Koniag does not believe that enactment of any of these proposals will address the concerns with returns and/or user conflicts in other management areas and enactment of these proposals will only have the effect of harming Kodiak's salmon fishermen while not helping the other management areas.

The 2014-1016 genetic study authored by Kyle Shedd is not "new" information in the sense that the conclusions were not previously known. The genetic study provides additional snapshots of detail illustrating the information and conclusions reached by the Department during the 1990-1995 time-frame. Namely, "The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years." Moreover, the percentage of the Cook Inlet run incidentally captured in the Kodiak fishery during the 2014-16 time period is well with the ranges suggested by these earlier studies.

koniag.com

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The Cape Igvak Management Plan has been in place for 40 years. The reason for the plan was conservation - to protect Chignik's late run. Prior to the plan, Kodiak fished at Cape Igvak "day for day" when the Chignik fishery was open. While Chignik was fishing on the "early run", it was thought that Kodiak could be impacting the "late run." Consequently, the Cape Igvak management plan insured both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting Kodiak. Kodiak's catch percentage of the Chignik run prior to the Cape Igvak Management Plan was about 15%. Under the plan, Kodiak has averaged about 12% (during years when fishing has occurred). Finally, the conservation aspects of the Cape Igvak Management plan were manifested by no Kodiak fishing at Cape Igvak during Chignik's recent run failures. The fact is, the Cape Igvak Management Plan works for both Chignik and Kodiak and should not be changed.

For these reasons, Koniag requests that the Board of Fisheries take no action on Proposals 37, 58, 59, 60, 61, 62, 63, 64, 65 and 66.

Quyanaa (thank you),

Shauna Z. Hegna
President



DEC 26 2019

BOARDS

The Board's mixed stock salmon fisheries policy provides that the Board's preference in assigning conservation burdens in mixed stock fisheries is through management plans set out in area regulations. Long-standing management plans are presumed to incorporate conservation burden and harvest allocation.

It follows, then, that Kodiak's multiple management plans indicate that allocation and conservation apportionments are long-accomplished, with several prior boards affirming their equity.

If changes are considered for these long-standing stable fisheries, significant new information must be provided to justify upsetting the stability, or the changes will appear arbitrary which would compromise the Board's reputation as a fair and impartial regulator.

Kodiak's stable and durable salmon fishery management plans have withstood an onslaught of proposed changes from both Cook Inlet and Chignik over the past 30 to 40 years. All of Kodiak's commercial salmon fisheries are covered by management plans



focused on local stocks and have been for several years. There are no areas not covered by a plan.

Extensive proposed changes to Kodiak salmon management, therefore, must be well justified to overcome the current allocative stability cemented over a long time by past boards. To change these plans just for the sake of change would invite twisting, perverting, or ignoring the allocation criteria in order for this board, in contrast to all prior Boards, to get a different allocative result.

More specifically, the Cape Igvak proposals, # 58-62, are all 100% allocative in nature. The proposers do not even attempt to provide exceptional and credible new information to justify dramatically changing the long-standing Cape Igvak management plan.

The Cook Inlet proposals, especially proposal 66, suffer similar deficiencies. There is no new genetic information and no harvest rates set forth that would warrant upending the stability of Kodiak Island's seven management plans.



Speculation, scattergun cuts, and blind stabs are not credible reasons to upset a management plan, and are not hallmarks of the Board's fair and impartial process. In summary, the proposers have not met their burden of providing measurable evidence of new fishing patterns or new stocks of concern.

The Kodiak fishery stands on its own history, its own economic importance, and its own series of tight management plans adopted and polished over decades to stay viable. I hope you keep it that way.

Larry Edfelt
Box 210821
Auke Bay, AK 99821

~~T-10~~ 907 209 0712



PC553
1 of 3

PHONE (907) 847-2207
FAX (907) 847-2307

PO Box 50
LARSEN BAY
ALASKA 99624

December 19, 2019

Alaska Board of Fisheries
1255 West 8th St.
Juneau, Ak 99811

Re: Maintain Kodiak's Salmon Fishery
Oppose Proposals: 58,59,60,61,62,63,64,65,37 and 66

Dear Alaska Board of Fisheries:

I am Richard Henson and I represent The Native Village of Larsen Bay in the community of Larsen Bay. Our community's economy is entirely based on fishing and on Kodiak's salmon fishery is particular. Loss of salmon fishing opportunities will have a direct impact on Larsen Bay.

We wonder what Kodiak fishermen have done that would justify changing our management plans. Our salmon fishery has not expanded, in fact there are fewer permits fishing now than were fishing five and ten years ago. We don't see any "new" fisheries for Kodiak salmon developing. Kodiak's management plans cover the entire Island and the Mainland and they only allow fishing openings based on the presence of local stocks. These plans have been in place for more than 25 years and have precluded expansion of salmon fishing that is not based on the presence of local stocks.

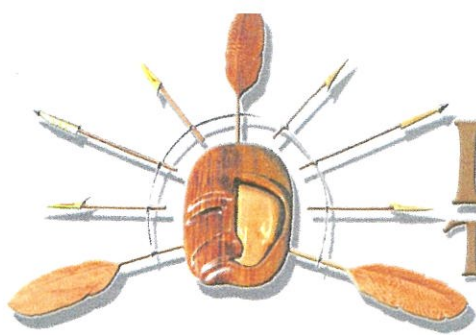
The 2014-16 genetic study authored by Kyle Shedd is not "new" information in the sense that the conclusions were not previously known. The genetic study provides additional snapshots of detail illustrating the information and conclusions reached by the Department during the 1990-1995 time frame. Namely, **The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years.** Moreover, the percentage of the Cook Inlet run incidentally captured in the Kodiak fishery during the 2014-16 time period is well with the ranges suggested by these earlier studies.

The Cape Igvak Management Plan has been in place for 40 years. The reason for the plan was conservation to protect Chignik's late run. Prior to the plan, Kodiak fished at Cape Igvak "day for day" when the Chignik fishery was open. While Chignik was fishing on the "early run", it was thought that Kodiak could be impacting the "late run". Consequently, the Cape Igvak management plan insured both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting Kodiak. Kodiak's catch percentage of the Chignik run prior to the Cape Igvak Management Plan was about 15%. Under the plan, Kodiak has averaged about 12%. (During years when fishing has occurred). Finally, the conservation aspects of the Cape Igvak Management Plan were highlighted with Chignik's recent run failures. There was no fishing at Cape Igvak! Why change a balanced plan that is accomplishing its intended purposes?

In summary, The Native Village of Larsen Bay request that the Board of Fisheries take no action on Proposals 58,59,60,61,62,63,64,65,37 and 66!

Sincerely,

Richard Henson
President



LARSEN BAY TRIBAL COUNCIL



PC553
2 of 3

PHONE (907) 847-2207
FAX (907) 847-2307

PO Box 50
LARSEN BAY
ALASKA 99624

RESOLUTION 2019- 11

A RESOLUTION OF THE NATIVE VILLAGE OF LARSEN BAY IN SUPPORT OF THE ALASKA DEPARTMENT OF FISH AND GAME'S TRADIITIONAL AND HISTORIC MANAGEMENT OF THE KODIAK SALMON FISHERY, AND IN OPPOSITION TO PROPOSALS 58, 59,60,61,62,63,64,65,37 AND 66.

- WHEREAS:** the Kodiak commercial salmon fishery was one of the first salmon fisheries developed in the State of Alaska and has continuously operated on the Alaska Mainland and the West Side of Kodiak Island since before 1980; and
- WHEREAS:** Kodiak's commercial salmon fishermen and virtually all residents of Larsen Bay are economically and culturally dependent on the Kodiak commercial salmon fishery; and
- WHEREAS:** Kodiak's six Alutiiq rural communities, including the community of Larsen Bay are economically struggling due, in part, to dramatically reduced codfish quotas and substantially lower ex-vessel prices as well as impacts from the State of Alaska's budget crisis; and
- WHEREAS:** the Cape Igvak Management Plan was implemented to protect Chignik's "second run" and maintain the historical catch of Chignik bound fish by the Kodiak fleet; and
- WHEREAS:** for the last 40 years the Cape Igvak Management Plan has effectively balanced Chignik's conservation and economic needs with Kodiak's historical participation in the Cape Igvak fishery; and
- WHEREAS:** the Cape Igvak Management Plan does not impact the current biological concerns for Chignik's early run sockeye in that the Cape Igvak fishery is closed until an adequate escapement and catch is assured for the Chignik fishery; and
- WHEREAS:** in addition to the Cape Igvak fishery, all the remainder of Kodiak's commercial salmon fishery has remained essentially the same fishery since the implementation of North Shelikof Management Plan in 1989; and
- WHEREAS:** Kodiak's commercial salmon fishery has shared the burden of conservation for Cook Inlet salmon stocks since 1989; and
- WHEREAS:** recent sockeye genetic information confirms what was already known about the presence of Cook Inlet sockeye in the Kodiak Management Area, namely "the incidence of Cook Inlet sockeye in the KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years"; and
- WHEREAS:** further restrictions on Kodiak's salmon fishery to limit the catch of Cook Inlet sockeye would substantially impact Kodiak's fishing for local sockeye as well as for pinks, chums, and coho, costing Kodiak fishermen millions of dollars while such restrictions may or may not result in any protection for Cook Inlet sockeye depending on the year, place and time that Cook Inlet stocks may be in the Kodiak area; and



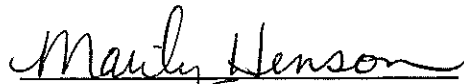
WHEREAS: neither the Alaska Board of Fisheries Mixed Stock Fisheries policy or the Board's Allocation Criteria justify making changes to salmon management in the Kodiak Area.

NOW THEREFORE, BE IT RESOLVED BY THE NATIVE VILLAGE OF LARSEN BAY THAT:

Section 1: Larsen Bay hereby requests the Alaska Board of Fisheries maintain the balance between the commercial salmon fisheries in Kodiak, Chignik and Cook Inlet by taking no action on proposals 58,59,60,61,62,63,64,65,37 and 66.

ADOPTED BY THE LARSEN BAY TRIBAL COUNCIL THIS 18th **DAY OF** December, 2019


Richard Henson, President


Marilyn Henson, Secretary/Treasurer



Loyd Ashouwak
PO Box 106
Old Harbor
99643

12/18/19

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

RE: Proposal 37,58,59,60,61,62,63,64,65,66

Dear Chairman Moriskey and Board of Fish members:

My name is Loyd Ashouwak and I am a lifelong resident of Old Harbor, Alaska located on the eastside of Kodiak Island. I am 57 years old and have been involved in the salmon fishery in Kodiak since I was 10 years old. The salmon fishery in Kodiak is my primary source of income to support myself and my family through the winters in Old Harbor.

The proposals to change the Kodiak fishery from the Chignik and Cook Inlet fisherman threaten the only fishery I have left to depend on. I've watched the different fisheries around the island go away, as cod are gone, crab stocks are low, halibut numbers are decreasing, and the herring fishery isn't worth the effort anymore. Salmon is the only fishery that seems to have any life left in it, and these proposals threaten that dependability and consistency.

I have tossed around the idea of investing in the salmon fishery, as it has been proven to be reliable year after year based on the quality of the management plan. This management plan allows the boats I have fished on to fish in multiple areas on multiple species of fish throughout the entire summer. I would respectfully ask the Board to **reject all these proposals**, as they threaten the quality of that management plan and my ability to rely on it should I decide to invest in the industry.

Sincerely,

Loyd Ashouwak



RE: PROPOSAL 58 Close the Cape Igvak commercial salmon fishery prior to July 8

December 27, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 RE: OPPOSE Proposal 58-62 Dear Chairman Morisky and Board of Fish members: The Cape Igvak fishery on the Kodiak mainland has been a long-standing fishery harvesting primarily Chignik bound sockeye with an allocation of 15 percent of the Chignik catch. The management plan implementing the Cape Igvak fishery has been amended a few times, almost always to Kodiak's detriment and Chignik's gain. Kodiak fishermen have accepted the additional safeguards for Chignik. Currently, Kodiak vessels cannot fish at Cape Igvak until Chignik has caught 300,000 sockeye. How many of Alaska's salmon fisheries have an onerous regulation like that to start the season? There is only one other, and that is an identical provision near the Area M boundary at the west end of Chignik. This regulation was a huge concession on the part of Kodiak fishermen to share the burden of conservation and protect Chignik fisheries. A current Chignik proposal, # 61, seeks to increase the 300,000 fish trigger to 600,000, essentially negating the long-time 15 percent allocation to Kodiak seiners. Another proposal (# 60), seeks to slash the long-standing 15 percent allocation to 5 percent. At the Area M meeting last February in Anchorage the Board turned away most of Chignik's proposals to extract even more fish from Area M. The Board needs to do the same thing in Kodiak. Their proposals are purely allocative. Nothing has changed under the allocation criteria to justify a different allocation. We acknowledge Chignik did not fish in 2018, but that year's diminished run should not be used to further cut back the Cape Igvak fishery. Under the existing management plan Kodiak fishermen did not fish Cape Igvak in 2018 also. Chignik is well protected by the 300,000 fish trigger. Doubling that is a fish grab, not an act of conservation. Please reject proposals 58 through 62. Sincerely, Luke Lester F/V Raging Beauty



RE: PROPOSAL 66 Create a Kodiak Area Salmon Management Plan

December 27, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 RE: OPPOSE Proposal 58-62 Dear Chairman Morisky and Board of Fish members: RE: Opposed Proposals Dear Chairman Morisky and Board of Fish Members: Incidental, non-targeted bycatch in the salmon fisheries of Alaska is a regular feature in dozens of areas. Cook Inlet fishermen complain that Kodiak catches fish bound for Cook Inlet. But Cook Inlet driftnets when fishing for Kenai River reds indiscriminately catch reds and cohos bound for the Matanuska and Susitna river systems. The Mat-Su interceptions are incidental and while the catch is minimized, it can't be stopped altogether. In Bristol Bay, sockeye and chums bound for the Kuskokwim are caught in the Nushagak and Togiak districts. No effort is made to stop that. The Egegik fishery takes some sockeye headed for Ugashik. The Kvichak fishery has a bycatch of of sockeye headed for the Naknek and other systems. In the absence of a severe conservation problem, no adjustments are made for bycatch in these fisheries because it is a common attribute of the fishery. The bycatch fish belong to the fishermen who catch them. Southeast Alaska is a giant mixed stock fishery. The troll fishery, consisting of 2000 boats, catches king salmon bound for the west coast of Washington, Oregon and British Columbia.. The Southeast Alaska troll chinook catch, even though non-local in summer, is protected by the US-Canada treaty. It is the official position of the State of Alaska that salmon use multiple marine habitats for feeding and rearing, and that simple proximity to salmon spawning streams should not confer harvest priority or preference. Cook Inlet and Chignik fishermen want to take an axe to Kodiak fisheries in an effort to boost their own fortunes. Kodiak bycatch of Chignik and Cook Inlet salmon has already been minimized to the greatest practical extent, and what bycatch remains is part of the long-standing allocation of Kodiak salmon by the efforts of many past boards. Please reject all efforts to change that. Sincerely, Luke Lester F/V Raging Beauty



December 26, 2019

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

Dear Chairman Morisky and Members of the Board of Fisheries,

As I'm sure you're well aware the past several years have seen some dramatic changes to our fisheries, with some areas coming in above projected escapement to set historic records, while other areas seeing unprecedented low returns of salmon. Further, while some areas may come in at their projected harvest, the catch seems to be less evenly distributed among fisherman and among gear-types in harvest areas. This departure from what has been normal harvest patterns has left many looking to the cause of change and/or someone to blame; and in many cases emotion and hypothesis have short circuited thoughtful fact-based decision making. My focus in this letter is to address proposals up for consideration this year that are aimed at curtailing the perceived impact that Kodiak fisherman have on adjacent areas. It should be noted that during periods of normal return the districts to the north and south of Kodiak seem to enjoy decent fishing. The proposals that are up before the Board are a dramatic departure of 30 years of management and in my opinion reflect an emotional knee-jerk reaction to what should be a thoughtful fact-based assessment of what is best and fairest for all.

Changing something that has worked for 30 years does not feel like a step in this direction of fairness based on sound decision making. By adopting many of these proposals it will effectively cause a loss of fishable area on Kodiak by limiting the areas open; all in order to achieve negligible positive gains outside the Kodiak harvest areas. For me and other set netters like me, many of the proposals being considered will have the negative effect of limiting the opportunities to catch salmon bound for Kodiak waters by limiting fishing time and increasing the competition and interaction between gear types. While I offer no specifics as to what the outcome of deliberation should be, I do make a plea for thoughtful, sound fact-based decision making.

Thank you for your efforts and your thoughtful consideration.

Sincerely, Mark Larsen

**RE: PROPOSAL 71, 62, 63, 64, 37, 58**

My name is marko Patitucci, I'm 29 years old and second generation fisherman from kodiak ak. I have spent every summer of my life seining in kodiak since I was 4 years old. I was fortunate enough to buy into the industry in 2010. I understand that in every fishery there are natural changes that effect the industry, and that is a risk we know that is there. Now with these new proposal our kodiak fishery is at risk, kodiak salmon fisheries have never been a easy way to make a living. The weather is bad and the fishing is rarely great. All I am asking is that we are able to have the same opportunity that we have always had. The opportunity to work hard long hours and days with our crews. Which time and time again has proven the only way to have a successful kodiak salmon career. With that said, I do not support any changes to our management plan. It would significantly hurt and change thousands of life's for the worst. Please do not let these proposals go through. I do not support any of these proposals. Proposal 37, proposal 58, proposal 70, proposal 71, proposal 62, proposal 63, proposal 64. Thank you for your consideration.



Marine Way Boatyard
817 E Marine Way
Kodiak Ak
99615

12/27/19

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

RE: Proposal 58,59,60,61,62,63,64,65,66

Marine Way Boatyard, previously known as Fuller's Boatyard is the largest provider of drydock facilities for small to medium sized vessels, and has been in operation since 1972. We provide haul-out services for vessels up to 150 tons and service the majority of Kodiak's seine vessels as well as overwintering storage for motor sailors, seiners and sport charter vessels.

We are grateful for the opportunity to express our concern relative to the proposals before the Board to curtail the Kodiak salmon fishery. As a support industry business with a large consumer base of local seine vessels our business model feels a direct impact from both successful and poor fishing seasons, predominantly the summer salmon fishery. During years where Kodiak fishermen have good salmon seasons, such as 2013 and 2015 our yard is busy with winter upgrade projects and other local businesses providing services such as fiberglass repair and reconstruction, welding and fabrication, hydraulic retrofits, and routine hull maintenance. During years of poor salmon seasons such as 2016, our yard sees little to no traffic and struggles to make profit off long term storage for overwintering vessels. It is our understanding, the proposals attempting to change the Cape Igvak fishery and the Westside and Mainland fisheries pose an economic threat to the salmon industry which in turn is a threat to our industry, the support services industry. We urge the Board to consider the trickle-down effect these proposals would have to an already downtrodden community that once thrived on a multitude of reliable and profitable fisheries. The salmon fishery in Kodiak is the last reliable fishery for a vast number of support businesses in the Kodiak community to count on for continued business during the winter and spring months.

Marine Way Boatyard respectfully requests the Board **reject** any proposals to change the Kodiak salmon management plan, including the Cape Igvak management plan. Let Kodiak fishermen and the businesses that support them continue to exist in the established and well managed fishery we have come to count on for almost 48 years.

Sincerely, Marine Way Boatyard

Melissa A Schmeil/ owner

Albert Tyler Schmeil/ owner

Melodi Anderson
Box 112
Ouzinkie, AK 99644



PC559
1 of 1

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Vote NO Proposals 37, 58,59,60,61,62,63,64,65,66

Board Chairman Morisky and Board Members:

It has come to my attention that you will be reviewing the above proposals at your January Board meeting in Kodiak. I live in Ouzinkie and have been active on the City Council and Tribe to help our community. Any of these proposals that takes away salmon fishing opportunities is a direct hit to Ouzinkie's economy. Many of our residents either fish for salmon or crew on salmon fishing vessels.

I am aware that the incidental, non-targeted bycatch is a part of a number of the salmon fisheries of Alaska. Cook Inlet fishermen complain that Kodiak catches fish bound for Cook Inlet. But Cook Inlet driftnets when fishing for Kenai River reds indiscriminately catch reds and cohos bound for the Matanuska and Susitna river systems. The Mat-Su interceptions are incidental and regulations seek to reduce the catch, but it couldn't be stopped altogether.

In Bristol Bay, sockeye and chums bound for the Kuskokwim are caught in the Nushagak and Togiak districts. No effort is made to stop that. The Egegik fishery takes some sockeye headed for Ugashik. The Kvichak fishery has a bycatch of sockeye headed for the Naknek and other systems. In the absence of a severe conservation problem, no adjustments are made for bycatch in these fisheries because it is a common attribute of the fishery. The bycatch fish belong to the fishermen who catch them.

Southeast Alaska is a giant mixed stock fishery. The troll fishery, consisting of 2000 boats, catches king salmon bound for the west coast of Washington, Oregon and British Columbia. The Southeast Alaska troll chinook catch, even though non-local in summer, is protected by the US-Canada treaty. It is the official position of the State of Alaska that salmon use multiple marine habitats for feeding and rearing, and that simple proximity to salmon spawning streams should not confer harvest priority or preference.

Cook Inlet and Chignik fishermen want to take an axe to Kodiak fisheries in an effort to boost their own fortunes. Kodiak bycatch of Chignik and Cook Inlet salmon has already been minimized to the extent practical. The remaining bycatch is part of the long-standing allocation to Kodiak salmon fishermen focused on local stocks. Vote No on 58,59,60,61,62,63,64,65,66 & 37.

Sincerely yours,

Melodi Anderson



RE: Comment on multiple proposals

RE: Proposals #37, 58-66, 70-77 Dear Chairman Reed Morisky and Board of Fish Members: I am 32 years old and was born and raised in Kodiak. I have been an active participant in nearly all of the commercial fisheries here for 23 years. Six years ago, I purchased my own vessel and Kodiak seine permit with hopes to continue my passion and livelihood for a fishery that has been a part of my family's lives for three generations. My decision to invest as heavily as I did in Kodiak's fisheries were centered around the fact that Kodiak's management plan is complex and well-constructed, considerate not only to the locals who fish in Kodiak, but also to other fishing groups, such as Chignik and Cook Inlet, whose salmon pass through our waters. There are a large number of proposals we are currently looking at that could cause significant harm to our livelihoods here in Kodiak, and that is why I am respectfully asking the Board to please oppose Proposals #37, 58-66, 70-77. I grew up on the west side of this island in the off-grid location of Uganik Bay. Many of these proposals, should they pass, would greatly reduce my ability to fish the area I am most familiar with on this island. My vessel and gear limit me in terms of where I can fish. I spend considerable time fishing inner bays, but also capes on the west side when conditions allow. Considering that there are a large number of variables--weather, breakdowns, low salmon returns--that can interfere with making the most of my fishing season, it is concerning to now be faced with further unnecessary obstacles that could shut down a significant portion of the salmon season. I am not wealthy and I have boat payments to make. Other fisheries that used to supplement my income, such as halibut and Pacific gray cod, are in decline, thus making me even more dependent on the salmon fishery as I have always known it. These proposals have the potential to not just cripple my own ability to make a living, but a great many of my commercial fishing friends and family who are also heavily reliant on Kodiak's salmon fishery. Kodiak's current management plan has nothing to do with the poor salmon returns to the Cook Inlet and Chignik areas. It was constructed with not just the Kodiak fishermen in mind, but in consideration of other areas as well. May it be reminded that salmon runs are cyclical in nature, experiencing highs and lows. Kodiak has had its own fair share of low returns. Trying to change Kodiak's system of management is by no means going to fix what can't be controlled in nature. It is concerning to imagine how these proposals could affect the salmon fishermen here, especially those of us like myself, who have large boat payments to make and are dependent on keeping the fishery the way we grew up knowing it. I don't want to lose everything I have worked so hard for. Commercial fishing is not just my livelihood, it is my passion, and I would like to continue doing it for many years to come. Again, with utmost respect, I ask that the Board please oppose Proposals #37, 58-66, 70-77. Thank you for giving me the opportunity to comment, and for your time. I hope the Board continues to apply consistency in its application of the guiding policies such as the Mixed Stock Fisheries Policy and the Sustainable Fisheries Policy. Most sincerely, Michelle Rittenhouse



RE: Comment on multiple proposals

i oppose proposals (37,58-66) none of these proposal seem to be supported numerically or biologically .and appear to be politically motivated resource reallocations . with the future of GOA codfish fisheries questionable kodiak seining will not only play a more important role in the community of kodiaks taxbase but will become one of the few remaining entry level or open access fisheries available to young and future fisherman.



Mitchell Keplinger
Box 1006
Kodiak, Ak 99615

12/18/19
Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 58,59,60,61,62

Dear Chairman Morisky and Board of Fish members:

My name is Mitch Keplinger and I am a 3rd generation Kodiak Salmon seine fisherman. I started fishing in Kodiak in 1969 when I was 8 years old. At that time, I fished on my dad's boat for king crab, salmon, halibut, and herring. I started running a boat in 1979 when I was 18 years old, and have made my entire livelihood on commercial fishing out of Kodiak. Salmon is currently my primary fishery. I am writing today to request the Board **reject proposals 58, 59, 60, 61, and 62.**

I find myself wondering how many times in my lifetime I will have had to defend the Cape Igvak management area against these identical proposals. Board cycle after board cycle, since the plan was implemented in 1978, Kodiak fisherman have had to defend our historical access to this area. I fished as crew on my dad's boat prior to the implementation of the Cape Igvak management plan. These proposals are nothing but a fish grab by Chignik fisherman who have experienced the natural down cycles of salmon runs. The plan has existed and been managed well for over 40 years, and is unlike all other management plans in the state with the exception of the plan for Chignik harvest in Area M. These plans were designed to have biological and allocative safeguards for the Chignik runs and fishermen. Kodiak fishermen could not, nor never have caused any biological or economic harm to the Chignik Management area, because the management plan does not allow us to. If the preseason forecast for the Chignik area is less than 600,000 sockeye, Kodiak management may not open the Cape Igvak section. In years where the harvest in Chignik is projected to be higher than 600,000 sockeye, Kodiak fishermen still do not fish until 300,000 sockeye have been harvested. To claim, as these proposals do, that Kodiak fishermen are placing an economic stranglehold on the Chignik area is false and unjustified.

Please leave the Cape Igvak fishery alone. The management plan works well and historically it has contributed largely to my salmon business.

Sincerely,

Mitch Keplinger
F/V Alinchak



Mitchell Keplinger
Box 1006
Kodiak, Ak 99615

12/18/19
Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 63,64,65,66

Dear Chairman Morisky and Board of Fish members:

My name is Mitch Keplinger and I am a 3rd generation Kodiak Salmon seine fisherman. I started fishing in Kodiak in 1969 when I was 8 years old. At that time, I fished on my dad's boat for king crab, salmon, halibut, and herring. I started running a boat in 1979 when I was 18 years old, and have made my entire livelihood on commercial fishing out of Kodiak. Salmon is currently my primary fishery. I am writing today to request the Board **reject proposals 63, 64, 65, and 66.**

These proposals are a reaction to the 2014-2016 sockeye identification study in the Kodiak Management area, that showed an already known fact; Kodiak commercial fisherman harvest Cook Inlet bound sockeye. As mentioned before, I have been fishing for over 50 years, and every year Kodiak fishermen have probably harvested some amount of Cook Inlet sockeye usually in an amount relative to the size of the Cook Inlet runs. There is no conservation concern for Cook Inlet stocks incidentally caught in Kodiak, if there was you would have seen a decrease in run strength over time, rather than current trends of over-escapement in some of the major Cook Inlet salmon producers. In addition, the overall king salmon that would be saved by the drastic measures of proposal 63 would be unmeasurable relative to the economic loss Kodiak fisherman would face.

These proposals take no consideration for the amount of pinks and chums harvested in the Kodiak salmon fishery, both of which make up the majority of my salmon harvest by volume and by dollar value. Please leave the Kodiak salmon fishery alone. We operate under a well-managed and well thought out management plan that allows the targeted harvest of local stocks and have been in all the years I've fished Kodiak.

Sincerely,

Mitch Keplinger
F/V Alinchak



Mitchell Keplinger
Box 1006
Kodiak, Ak 99615

12/26/19
Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 72,73,74,75

Dear Chairman Morisky and Board of Fish members:

My name is Mitch Keplinger and I am a 3rd generation Kodiak Salmon seine fisherman. I started fishing in Kodiak in 1969 when I was 8 years old. At that time, I fished on my dad's boat for king crab, salmon, halibut, and herring. I started running a boat in 1979 when I was 18 years old, and have made my entire livelihood on commercial fishing out of Kodiak. Salmon is currently my primary fishery. I am writing today to request the Board **reject proposals 72, 73, 74, and 75.**

While I respect the attempt of the author of these proposals to conserve king salmon to the Ayakulik river, these proposals are based entirely on perceptions and assumptions with no scientific validity. The reality is, the number of kings caught in the Inner Ayakulik section is miniscule relative to the amount of sockeye and pinks harvested. I fish a shallow draft seiner and when Inner Ayakulik section is open I am usually fishing there, as I enjoy fishing in shallow water in challenging sets. I could probably count the number of kings I have harvested in the Inner Ayakulik section on one hand in the last 15 years. These proposals would not result in any "safe passage" for kings, however they would create difficulties for local ADFG management to manage the Ayakulik river as a terminal fishery if need be to prevent over escapement.

In closing, I would ask that the Board consider what king salmon runs are doing well in the Gulf of Alaska? There is a chronic problem in the environment that is causing the decline of king runs in the Gulf, not fishermen in Inner Ayakulik.

Sincerely,

Mitch Keplinger
F/V Alinchak



Nathaniel Rose
3011 Spruce Cape Rd
Kodiak AK
99615

12/27/19

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 1 15526
Juneau, AK 99811-5526

RE: Cape Igvak Management plan, Proposals 58, 59, 60, and 61.

Dear Chairman Morisky and Board of Fish members:

I am a 34-year old salmon seine fisherman from Kodiak, Alaska. I did not grow up in a family tied at all to the commercial salmon fishery in Kodiak, however I fell in love with salmon seining in 2006 during my first season as a crewmember. My wife and I bought our first salmon seiner in 2013 in what would be one of the best seasons on record for the Kodiak salmon fishery. The Kodiak salmon fishery is our lifeblood economically and during the first years of our operation, the Cape Igvak fishery provided roughly 20% of our seasonal income from salmon. I request the Board **reject proposals 58, 59, 60 and 61** as they are proposals without sound reasonings or justifications for change.

These proposals which seek to amend the Cape Igvak management plan are predicated on the argument that Kodiak fishermen are placing pressure on the Chignik commercial sockeye fishery and in doing so creating an economic hardship for the fishermen and communities of the Chignik Management area. What the Board will hear from Chignik fishermen is an argument that Kodiak fishermen's harvest is placing a heavier burden on the Chignik early run and therefore to allow the "economic rebuilding" of the Chignik area, Kodiak fishermen should forego any harvest of the early run to allow a "redistribution of catch" to the Chignik area. The rationale behind this justification is so blatantly false, it is almost laughable. The Cape Igvak management plan was designed to provide protections to the Chignik runs and fleet so this specifically could not take place. These protections provide biological and allocative measures to not only ensure the Chignik runs could meet escapement goals, they also provide certainty to Chignik fishermen of the first harvests of Chignik runs. With the exception of the very similar management plan in Area M regarding harvest of Chignik stocks, there exists no other management plan in the state of Alaska with such well-designed protection measures in place.

The question bears to be asked, how would Chignik fishermen, who are currently prosecuting an expanding fishery in the Western and Perryville district on eastbound sockeye proven to be of non-local origin (see WASSIP) and the Eastern district on eastbound pink salmon, respond if Kodiak fisherman asked the Board for the same consideration be given to Kodiak sockeye and pink salmon stocks? No scientist is needed to realize these same fishermen that are arguing the need for more of "their fish" would be screaming for the largest allocation of non-local stocks they could possibly get. The Board should remain consistent in its application of the Mixed Stock Salmon policy, as "fishermen need to be assured that those standards will be applied uniformly to all mixed stock salmon fisheries, not just those that engender controversy and notoriety." (5AAC 39.220) I ask the Board not to be



caught up in the emotional appeal of a “needed” change by Chignik fishermen and recognize the Cape Igvak fishery exists for Kodiak fishermen, because it has always been a part of the Kodiak fishery, and that the management plan created for that fishery was one crafted with the utmost care and has been under scrutiny by past Boards for over 40 years and found to be solid.

The Cape Igvak management plan was created to preserve traditional fishing access for both Chignik and Kodiak fishermen, not as a gracious gesture from Chignik fishermen during a time when Kodiak salmon stocks were in a state of decline. Kodiak fishermen have always accepted the reality that in fishing there are natural fluctuations in abundance and to place blame on another user of a historical resource for those natural declines would be hypocritical and naïve.

I hope the Board recognizes that you cannot solve the economic situation in the coastal Chignik communities by taking away anything from the Cape Igvak fishery, all you would accomplish if you tried would be a removal of opportunity for Kodiak fishermen in an area we have historically had access to.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Rose', is positioned below the word 'Sincerely,'.

Nathaniel Rose
F/V June Sea



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

How would the Chignik fishermen appreciate being called liars and breakers of the law.



Nathaniel Rose
3011 Spruce Cape Rd
Kodiak AK
99615

12/27/19

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 1 15526
Juneau, AK 99811-5526

RE: Kodiak Management Plan, Proposals 63,64,65, and 66.

Dear Chairman Morisky and Board of Fish members:

Thank you for the opportunity to comment on the proposals regarding changes to the Kodiak management plan in an attempt to provide safe passage for king salmon and sockeye salmon bound for Cook Inlet. My wife and I currently own a 48-foot fishing vessel and the salmon fishery is one of two fisheries still profitable enough to justify participating in, the other being the small unreliable local tanner crab fishery. I respectfully request the Board **reject proposals 63, 64, 65, and 66** as they threaten not only the viability of our fishing business but the health of the community of Kodiak and surrounding villages.

All of these proposals were written with a focus on a snapshot of the Kodiak salmon fishery, as provided by the sockeye identification genetic study that was conducted in parts of the Kodiak Management Area (KMA) during the years 2014 through 2016. The problem with this snapshot is that it tells only one chapter, actually more like one page in a book that is the Kodiak Salmon fishery. The authors of these proposals would like the Board to believe this genetic study uncovered something new that needed Board action to fix, when in reality the study provided an affirmation of an aspect of the Kodiak fishery that has been widely known since long before it was first addressed in 1989 with the implementation of the North Shelikof Sockeye Management Plan; Kodiak fishermen incidentally catch Cook Inlet bound sockeye and a miniscule amount of kings while conducting targeted fishing efforts on local Kodiak stocks. The Board's Mixed Stock Fisheries Policy was written and adopted because the reality of any commercial fishery is that it is impossible to completely prevent fish of non-local origin mixing with those of local stocks. Every fishery in the State of Alaska is a mixed stock fishery, as the reality is fish migration patterns change due to a host of variables such as wind, currents, ocean temperature, and presence of food sources.

These proposals would drastically reduce the ability of ADFG management to manage the Kodiak Fishery in a manner consistent with sustained yield, not to mention create an economic crisis due to the foregone harvest of local sockeye, pink, chum and coho salmon. Please leave the Kodiak Management plan in the hands of the people who understand the Kodiak fishery, as it is not as black and white as the proposers make it out to be. Sincerely,

Nathaniel Rose
F/V June Sea



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau Alaska 99802-1668



PC564
1 of 9

December 27, 2019

Alaska Department of Fish and Game
Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Morisky:

The Alaska Region National Marine Fisheries Service (Alaska Region) wishes to provide the Board of Fisheries (Board) with the following information on several regulatory proposals for your consideration during the upcoming meeting in Kodiak, Alaska that could impact State of Alaska and Federal fisheries participants. Krista Milani from the Alaska Region will be attending the Board meeting and will be available to answer questions concerning our letter.

Sincerely,

for James D. Balsiger, PhD.

Administrator, Alaska Region





**Gulf of Alaska groundfish fisheries
Interaction between Federal and State of Alaska Fisheries
Alaska Board of Fisheries Meeting – January 11-14, 2020
NMFS Comments (Proposals 49, 50, 52, and 53)**

Proposal 49: 5 AAC 28.410. Fishing seasons for the Kodiak Area; and 5 AAC 28.4XX. New Section.

Background on federal sablefish harvest specification process:

Overfishing levels (OFLs), acceptable biological catches (ABCs), and total allowable catches (TACs) for sablefish are recommended by the North Pacific Fisheries Management Council (Council) at their December meeting and implemented by the National Marine Fisheries Service (NMFS) on a yearly basis. In the Gulf of Alaska (GOA) the Council recommends the OFL and ABC for sablefish for the entire GOA, although in December 2019 the Science and Statistical Committee (SSC) and the Council recommended the OFL for sablefish be specified Alaska-wide. ABC is apportioned to each of the GOA regulatory areas (Western, Central, West Yakutat, and Southeast Outside). The ABC is the maximum amount of harvest that can be taken in both state and federal fisheries combined and is designed to help ensure that overfishing does not occur. Once the ABC has been apportioned, the TAC is recommended for each area and cannot exceed the ABC for that area. The TAC in the Central Gulf of Alaska (CGOA) is further proportioned between trawl (20%) and fixed gear (80%). Fixed gear is fully allocated to the individual fishing quota (IFQ) program.

Potential Issue:

- *Sablefish quota holders and individuals holding sablefish IFQ and hired masters permits should be aware that they would only be allowed to harvest sablefish under the conditions of the IFQ program.*
- *Setting a GHL on TAC would not allow the Council to adjust TACs to account for the GHL fishery. However, if the GHL was set based on ABC the Council would be able to accommodate the GHL fishery during the TAC setting process.*

Proposal 49 seeks to create a state-waters guideline harvest level (GHL) fishery for sablefish in the Kodiak area. Should this proposal be adopted, participants should be aware that if there is a sablefish quota share holder onboard, sablefish individual fishing quota (IFQ) permits, or sablefish IFQ master permits they are subject to additional federal regulation. Under 50 CFR 679.1(d) vessels with a holder of these federal permits would only be allowed to harvest sablefish under the conditions of the IFQ program. An IFQ holder could not, for example, move to a state-waters sablefish fishery once all of their IFQ has been exhausted and continue to harvest. In addition, they must debit catch in a state-waters fishery from their federal IFQ. These regulations do not govern fishing for a sablefish GHL in Prince William Sound or under a State of Alaska limited entry program.

This proposal seeks to base the GHL on 1% of the federal CGOA IFQ TAC. The TAC is the amount of catch allocated for the federal fishery and the Council is responsible for



recommending TACs that do not exceed the ABCs. In most years, the Council recommends TACs that are equal to the ABCs in each of the regulatory areas in the GOA for sablefish. If the State fishery had a GHL based on the federal CGOA IFQ TAC there would be no way for the Council to adjust the TAC to accommodate the GHL fishery so as not to exceed the ABC. However, if the state GHL was based on the CGOA ABC, the Council could adjust the sablefish TAC as needed to accommodate the State GHL fishery.

Proposal 50: 5 AAC 28.430. Lawful gear for Kodiak Area; and 5 AAC 28.467. Kodiak Area Pacific Cod Management Plan.

Background on parallel fisheries:

Parallel fisheries are when a vessel is fishing under a federal TAC inside 3 nautical miles (State waters). Vessels are able to participate in a parallel fishery with or without a federal fishing permit (FFP) and their harvest is deducted from a federal TAC. If a vessel has an FFP then both State and Federal regulations apply.

Additional information:

- *Participants with an FFP should be aware that an LLP permit is required when fishing with more than five jig machines in the federal/parallel fishery.*

Proposal 50 seeks to increase the maximum number of jig machines per vessel that can be operated in the Kodiak Area Pacific cod fishery from five jig machines to six. It is unclear if this proposal pertains solely to the Kodiak Area state-waters GHL Pacific cod fishery or if it also extends to the Kodiak Area parallel Pacific cod fishery. If the intent of the proposal is to include the parallel fishery, then participants with an FFP should be aware of some additional federal regulation. Under 50 CFR 679.4 there is an exemption in the GOA which allows a vessel with an FFP to participate in a jig fishery with a maximum of five jig machines, one line per jig machine, and maximum of 30 hooks per line without obtaining a license limitation program (LLP) permit. Should Proposal 50 be adopted and include the parallel fishery, participants with an FFP would be required to obtain an LLP when using six jig machines. This would only apply to the parallel fishery and would not pertain to the Kodiak Area state-waters GHL fishery.

Proposal 52: 5 AAC 28.467. Kodiak Area Pacific Cod Management Plan.

Background on Pacific cod allocations:

Pacific cod OFLs, ABCs, and TACs are recommended by the Council and established by the Secretary of Commerce on a yearly basis. In the GOA the Council recommends the OFL and ABC for Pacific cod for the entire GOA. The ABC is apportioned to each of the GOA regulatory areas (Western, Central, and Eastern) based on the distribution of trawl survey biomass among each of the areas. The TACs are set based on the ABCs and are set to accommodate the State of Alaska's (State's) Pacific cod fisheries so that the ABC for Pacific cod is not exceeded. Currently there are three State fisheries that establish GHLs based on the



federal ABC in the Central GOA (total of 25%); Cook Inlet (3.75% of the ABC), Kodiak (12.5% of the ABC), and Chignik (8.75% of the ABC). Because the Council must ensure that total catch in the CGOA does not exceed the ABC, the Council must first calculate the state-water GHLS based on the CGOA ABC to determine the federal TAC. After taking into account state-waters GHLS fisheries, the TAC is set equal to or less than the remainder of the Pacific cod federal ABC and is allocated to seven gear and processing sectors. Approximately 90% of the total CGOA TAC is apportioned to federal CV sectors where catch is delivered to shoreside processors. Currently jig gear is 1% of the CGOA TAC, but has step-up and step-down provisions depending on catch in the previous year. After the jig quota has been determined and subtracted from the TAC, the remaining TAC is divided among the six additional sectors: catcher vessel (CV) 50 feet and over hook-and-line (HAL, 6.7%), CV under 50 feet HAL (14.6%), catcher/processor (C/P) and CV pot (27.8%), C/P HAL (5.1%), C/P trawl (4.2%), and CV trawl (41.6%). In addition, 3.81% of the total TAC is apportioned to trawl CVs participating in Rockfish Program cooperatives and deducted from the CV trawl allocation.

Potential Issue:

- ***Increasing the percentage of GHL fish based on the ABC reduces the amount of TAC available to federal participants. A reduced federal TAC can cause federal sectors to have shorter seasons, be closed to the directed fishery, or have insufficient incidental catch of Pacific cod to participate in other directed fisheries.***

Proposal 52 seeks to increase the Kodiak area GHL fishery from 12.5% of the CGOA Pacific cod ABC to 17.5% of the ABC. As a result, the total amount of GHL taken from the federal ABC for the three CGOA GHL fisheries would increase from 25% to 30%. Because the federal TACs are determined after the subtraction of the state-waters GHL fisheries, this would result in an overall decrease in the amount for TAC available for all federal CGOA Pacific cod sectors. Table 1 shows the Pacific cod allocations by sector should the Kodiak state-waters GHL fishery be increased to 17.5% based on the 2019 federal ABC. Although Table 1 depicts sector allocations based on the 2019 federal ABC it should be noted that the ABC could decrease in the future, which would further reduce the federal allocations.

The Federal Pacific cod fishery is a major source of income for many people. Some vessels are ineligible to participate in state-waters GHL fisheries due to gear and size restrictions and rely solely on federal Pacific cod fisheries. Table 2 shows, by home port, the number of vessels that participated in GHL only Pacific cod fisheries, the number of vessels in both GHL and federal/parallel Pacific cod fisheries, and the number of vessels in federal/parallel Pacific cod fisheries only in the CGOA for 2019. Fifty-seven of the 58 total vessels that participated in federal fisheries were CVs. Forty-nine of the vessels that participated in federal fisheries had registered home ports in Alaska.

In addition, Pacific cod biomass in the GOA significantly decreased in 2018, which resulted in decreased season lengths and some sector closures to directed fishing in 2018 and 2019. Directed fishing for federal Pacific cod in the GOA will be closed in 2020 pursuant to 50 CFR 679.20(d)(4). Although federal directed fishing will be closed in 2020, Pacific cod TAC is still needed as incidental catch so that directed fishing for other species can continue to occur. Table



3 shows the amount of Pacific cod taken incidentally in other CGOA federal directed fisheries from 2012-2019.

A further decrease in the federal Pacific cod TACs could have a negative impact economically on vessels participating in all CGOA federal fisheries, especially in years with already depressed ABCs.

Table 1. CGOA sector splits in 2019 based on Kodiak GHL at 12.5% and 17.5% of CGOA ABC in metric tons.

Pacific Cod Sector	25% of ABC (status quo)	30% of ABC	Difference in TAC/GHL
Central GOA ABC	7,667	7,667	-
Cook Inlet GHL fishery (3.75%)	288	288	-
Chignik GHL fishery (8.75%)	671	671	-
Kodiak GHL fishery (12.5% vs 17.5%)	958	1,342	384
Central GOA TAC	5,750	5,366	-384
Jig (1% of TAC)	58	54	-4
Hook-and-line < 50 CV	831	775	-56
Hook-and-line >= 50 CV	382	356	-26
Hook-and-line CP	291	271	-20
Trawl CV	2,367	2,210	-157
Trawl CP	239	223	-16
Pot CV and CP	1,583	1,477	-106

Table 2. Vessels who participated in CGOA Pacific cod directed fisheries in 2019 as of December 20, 2019 by registered home port.*

Home Port	Number of vessels in State GHL fisheries only	Number of vessels in both GHL and Federal/parallel fisheries	Number of vessels in Federal/parallel fisheries only
Homer, AK	9	12	17
Juneau, AK	4	3	1
Kodiak, AK	13	6	5
Other AK	7	4	1
Washington and Oregon	1	1	2
Unknown	6	5	1
Total	40	31	27

*Data for this table came from the NMFS Catch Accounting System on December 20, 2019.



Table 3. Incidental catch (IC) of Pacific cod in the CGOA from 2012-2019 in metric tons.

Year	Pacific cod IC taken in other directed fisheries
2012	3,061
2013	6,188
2014	9,004
2015	4,512
2016	2,895
2017	2,383
2018	2,416
2019	2,990
Eight Year Average	4,181



Proposal 53: 5 AAC 28.467. Kodiak Area Pacific Cod Management Plan.

Background on Pacific cod allocations:

As discussed in Proposal 52, Pacific cod OFLs, ABCs, and TACs for Pacific cod in the GOA are established by the Council on a yearly basis.

Potential Issue:

- *If the State has not determined how much GHL would be reallocated to the following calendar year before the December Council meeting, the Council might be unable to accurately determine the federal TAC for the upcoming calendar year.*
- *The amount of ABC taken each year for GHL fisheries would vary widely from year to year leaving a sense of uncertainty for Federal and State participants.*
- *Increasing the percentage of GHL fish based on the ABC reduces the amount of TAC available to federal participants. A reduced federal TAC can cause federal sectors to have shorter seasons, be closed to the directed fishery, or have insufficient incidental catch of Pacific cod to participate in other directed fisheries.*
- *ABC can vary widely from year to year which could result in the GHL fisheries exceeding the ABC in years where the ABC was reduced dramatically. This would adversely affect Federal management by requiring more restrictive management measures in following years to ensure the ABC is not exceeded.*

Proposal 53 seeks to add unharvested Pacific cod by jig vessels in the Kodiak Area state-waters GHL fishery to the state pot gear allocation in the following calendar year. The Council meets at the beginning of December each year to recommend the OFLs, ABCs, and TACs for the upcoming calendar year. The Council calculates the GHL based on the ABC and reduces the federal TAC by the GHL amounts when setting the federal TAC to ensure the ABC is not exceeded. As a result, the Council would need to know in advance of its December meeting how much GHL was being reallocated from one calendar year to the next so that the proper amount could be accounted for in the TAC setting process. If, by the early December meeting, the State has not yet determined how much GHL was going to be reallocated to the upcoming calendar year, the Council may not be able to accurately determine the federal TAC to recommend for the upcoming calendar year. In GHL fisheries that have step-up and step-down provisions based on fishery performance, the State informs the National Marine Fisheries Service (NMFS) by November 15 if these provisions will be in place in the following calendar year to help facilitate the TAC setting process.

In addition, this proposal would leave a high degree of uncertainty each year during the TAC setting process. In other state GHL fisheries the Council and industry know in advance how much of the ABC the State will allocate to each GHL fishery. In cases where step-up or step-down provisions have been met, it is clearly outlined in State regulation how much the GHL percentage (of ABC) will be increased or decreased. Proposal 53 would allow for an unknown amount of Pacific cod to be added to the GHL fishery, and thus reducing the federal TAC to account for the GHL fishery, each calendar year and could vary widely from year to year.



The Kodiak Area Pacific cod GHL is based on 12.5% of the federal CGOA ABC and divided 50/50 between jig and pot gear. Essentially both jig and pot gear receive 6.25% of the ABC. Currently a total of 25% of the ABC is allocated to accommodate three CGOA state GHL fisheries before setting the TAC. If unused jig GHL was re-allocated into the next calendar year then a maximum of an additional 6.25% based on the previous year's ABC would be subtracted. ABCs can vary widely from year to year based on annual stock assessments. In cases where ABCs decrease significantly from one calendar year to the next, it is possible that the GHL reallocation to the following calendar year would result in insufficient TAC to open federal directed fisheries, insufficient TAC to cover incidental catch needed in other federal directed fisheries, and, in extreme cases, may even exceed the CGOA ABC. For example, in 2017 the CGOA ABC was 44,180 mt and 2,761 mt of that was allocated to the Kodiak area jig fishery (Tables 4 and 5). In 2018, the CGOA ABC was only 8,118 mt, and, after subtracting 25% to account for the three CGOA State GHL fisheries, the TAC was 6,089 mt (Table 4). If unused Kodiak jig Pacific cod from 2017 was reallocated to 2018 then a maximum of an additional 2,761 mt could have been subtracted before setting the TAC, leaving only 3,328 mt for federal fisheries (Table 5). Once the TAC is set, it is further divided by the seven gear and processing sectors and seasons. If there is not sufficient TAC for the federal sector, then that sector will not open to directed fishing. The available TAC also has to cover any incidental Pacific cod caught during other federal directed fisheries.

In 2016, the NMFS published a final rule to revise the National Standard 1 (NS1) guidelines. The revised guidelines included a carry-over provision where unused TAC from one calendar year could be rolled to the following calendar year (50 CFR 600.310(f)(2)(ii)(B)). At the December 2019 Council meeting the Science and Statistical Committee (SSC) reviewed the NS1 technical guidance on the new ABC control rule provisions, including the carry-over provision. The SSC cautioned that because most stock assessments in the Alaska Region are done each year, it might be difficult to account for a carry-over if the SSC concludes that the ABC and OFL should be lowered on the basis of a more recent assessment. Because this is a new provision and currently being unused in the Alaska Region, it is unclear how this carry-over provision might work in Alaska fisheries. However, since the provision is intended to apply to the ABC, it would result in allocative effects on all sectors managed under an ABC.

As indicated under potential issues for Proposal 52, historically Pacific cod has provided a major source of income for many people, and some vessels are ineligible to participate in state-waters GHL fisheries. Although directed fishing for federal Pacific cod in the GOA will be closed in 2020, Pacific cod TAC is still needed so that directed fishing for other species can continue to occur. Table 3 (included in the comments for Proposal 52) shows Pacific cod taken incidentally in other directed fisheries in the CGOA in the last eight years. A further decrease in the federal Pacific cod TACs could have a negative impact economically on vessels participating in all CGOA federal fisheries, especially in years with already depressed ABCs.

**Table 4. 2018 CGOA ABC, GHLS, and TACs in metric tons.**

2018 CGOA ABC	GHL Fisheries	% of ABC	State GHL	2018 Based on Actual TAC		
				TAC	Federal Gear Sectors	Gear Sector TAC
8,118	Cook Inlet	3.75%	304	6,089	Jig	61
	Chignik	8.75%	710		HAL < 50 CV	880
	Kodiak	12.50%	1,015		HAL >= 50 CV	404
	Total	25.00%	2,030		HAL CP	308
					Trawl CV	2,507
					Trawl CP	253
					Pot CV and CP	1,676

Table 5. 2018 CGOA ABC, GHLS, and TACs based on maximum jig reallocation from previous year in metric tons.

2017 CGOA ABC	2017 Kodiak Jig GHL	2018 ABC	GHL Fisheries	% of ABC	State GHL	2018 Based on Maximum Jig Reallocation from 2017		
						TAC	Federal Gear Sectors	Gear Sector TAC
44,180	2,761	8,118	Cook Inlet	3.75%	304	3,328	Jig	33
			Chignik	8.75%	710		HAL < 50 CV	481
			Kodiak	12.50%	1,015		HAL >= 50 CV	221
			Kodiak (from 2017 jig)	34.01%	2,761		HAL CP	168
							Trawl CV	1,371
			Total	59.01%	4,791		Trawl CP	138
							Pot CV and CP	916



Native Village of Akhiok
P.O. Box 5030
Akhiok, Alaska 99615
December 13, 2019

Alaska Board of Fisheries
1255 West 8th St.
P.O. Box 115526
Juneau, AK 99811

Re: Maintain Kodiak's Salmon Fishery
Oppose Proposals: 58,59,60,61,62,63,64,65,37 &66

Dear Alaska Board of Fisheries:

I am Speridon Simeonoff Sr. and I represent the Native Village of Akhiok in the community of Akhiok. Our community's economy is entirely based on fishing and on Kodiak's salmon fishery in particular. Loss of salmon fishing opportunities will have a direct impact on Akhiok.

We wonder what Kodiak fishermen have done that would justify changing our management plans. Our salmon fishery has not expanded, in fact there are fewer permits fishing now than were fishing five and ten years ago. We don't see any "new" fisheries for Kodiak salmon developing. Kodiak's management plans cover the entire Island and the Mainland and they only allow fishing openings based on the presence of local stock. These plans have been in place for more than 25 years and have precluded expansion of salmon fishing that not based on the presence of local stocks.

Regarding the proposals from Cook Inlet, the 2014-2016 genetic study authored by Kyle Shedd is not "new" information in the sense that the conclusions were not previously known. The genetic study provides additional snapshots of detail illustrating the information and conclusions reached by the Department during the 1990-1995 time-frame. Namely, **"The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years."** Moreover, the percentage of the Cook Inlet run incidentally captured in the Kodiak fishery during the 2014-16 time period is well with the ranges suggested in these earlier studies.

The Cape Igvak Management Plan has been in place for 40 years. The reason for the plan was conservation - to protect Chignik's late run. Prior to the plan, Kodiak fished at Cape Igvak "day for day" when the Chignik fishery was open. While Chignik was fishing on the "early run", it was thought that Kodiak could be impacting the "late run". Consequently, the Cape Igvak management plan insured both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting Kodiak. Kodiak's catch percentage of the Chignik run prior to the Cape Igvak Management Plan was about 15%. Under the plan, Kodiak has averaged about 12%. (During years when fishing has occurred.) Finally, the conservation aspects of the Cape Igvak Management plan were highlighted with Chignik's recent run failures. There was no fishing at Cape Igvak! Why change a balanced plan that is accomplishing its intended purposes?

In summary, Native Village of Akhiok request that the Board of Fisheries take no action on Proposals 58, 59,60,61,62,63,64, 65, 37 & 66!

Very truly yours,

Speridon M. Simeonoff Sr.



NATIVE VILLAGE OF AKHIOK
RESOLUTION NO. 19-14

A RESOLUTION OF THE NATIVE VILLAGE OF AKHIOK IN SUPPORT OF THE ALASKA DEPARTMENT FISH AND GAME'S TRADITIONAL AND HISTORIC MANAGEMENT OF THE KODIAK SALMON FISHERY AND IN OPPOSITION TO PROPOSALS 58,59,60,61,62,63,64,65,37 AND 66.

WHEREAS, the Kodiak commercial salmon fishery was one of the first salmon fisheries developed in the State of Alaska and has continuously operated on the Alaska Mainland and the West Side of Kodiak Island since before 1980; and,

WHEREAS, Kodiak's commercial salmon fishermen and virtually all residents of Akhiok are economically culturally dependent on the Kodiak commercial salmon fishery; and,

WHEREAS, Kodiak's six Alutiq rural communities, including the community of Akhiok are economically struggling due, in part, to dramatically reduced codfish quotas and substantially lower exvessel prices as well as impacts from the State of Alaska's budget crisis; and,

WHEREAS, the Cape Igvak Management Plan was implemented to protect Chignik's "second run" and maintain the historical catch of Chignik bound fish by the Kodiak fleet, and

WHEREAS, for the last 40 years the Cape Igvak Management Plan has effectively balanced Chignik conservation and economic needs with Kodiak's historical participation in the Cape Igvak fishery, and

WHEREAS, the Cape Igvak Management Plan does not impact the current biological concerns for Chignik's second run sockeye in that the Cape Igvak fishery is closed until an adequate escapement and catch is assured for Chignik fishery, and

WHEREAS, in addition to the Cape Igvak fishery, all the remainder of Kodiak's commercial salmon fishery remained essentially the same fishery since the implementation of North Shelikof Management plan in 1989; and

WHEREAS, Kodiak's commercial salmon fishery has shared the burden of conservation for Cook Inlet salmon stocks since 1989; and

WHEREAS, recent sockeye genetic information confirms what was already known about the presence of Cook Inlet sockeye in the Kodiak Management Area, namely "the incidence of Cook Inlet sockeye in the KMA fishery varies widely. It is inconsistent as to area, annual timing, and between years", and

WHEREAS, further restrictions on Kodiak's salmon fishery to limit the catch of Cook Inlet sockeye would substantially impact Kodiak's fishing for local sockeye as well as for pinks, chums and coho, costing Kodiak fishermen millions of dollars while such restrictions may or may not result in any protection for Cook Inlet sockeye - depending on the year, place and time that Cook Inlet stocks may be in the Kodiak area, and

WHEREAS, neither the Alaska Board of Fisheries Mixed Stock Fisheries policy or the Board's Allocation Criteria justify making changes to salmon management in the Kodiak area.

NATIVE VILLAGE OF AKHIOK
NOW, THEREFORE, BE IT RESOLVED BY NVDA THAT:

Section 1: NVDA hereby requests the Alaska Board of Fisheries maintain the balance between commercial salmon fisheries in Kodiak, Chignik and Cook Inlet by taking no action on proposals 58,59,60,61,62,63,64,65,37 and 66.

ADOPTED BY THE NVDA
THIS 18 DAY OF December, 2019.

Spertson M. Simeonoff Sr.

Spertson M. Simeonoff Dec-12-18-19

PRINT
g'd

TITLE

SIGNATURE

DATE



Native Village of Ouzinkie
Address
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Oppose Proposals 58,59,60,61,62,63,64,37,65,66

To Whom it May Concern:

The Native Village of Ouzinkie represents tribal members that live in Ouzinkie. Many of our members are commercial salmon fishermen. Ouzinkie has been a commercial salmon fishing community for over 100 years. At one time we had two salmon processing plants operating in Ouzinkie. Since salmon fishing is so important to Ouzinkie, the Ouzinkie Tribe opposes attempts by Cook Inlet and Chignik fishermen to take fishing opportunities away from our fishermen. That's why we oppose proposals 58-66 and proposal 37 (along with RC 9).

Every time a new Board of Fisheries gathers to consider Kodiak salmon fishing regulations, the new Board members seem to have preconceived notions that something needs to change. This is because of the constant attacks and arguments pushed on the Board from adjacent areas that the common property nature of Alaska's salmon fisheries seemingly does not apply to the Kodiak area. Migrating fish caught in the Kodiak area, they say, belong to Chignik, or to Cook Inlet. This is a false argument of ownership these fish are common property – belonging as much to Ouzinkie tribal members as anyone from outside of Kodiak.

Nothing in Area K needs to change. So many boards at uncounted meetings have reviewed Cook Inlet and Chignik proposals and not made changes. Every salmon fishery in Kodiak has a management plan, and every management decision is based on local stocks. Major allocation battles have long ago been settled. Please allow the department to manage our fisheries, in season, based on local conditions, not the whims of fishermen in adjacent areas.

The Native Village of Ouzinkie views these proposals from Cook Inlet and Chignik as the same proposals the Board has reviewed again and again. There is no reason for the Board to accept any of these proposals. Vote NO on proposals 58,59,60,61,62,63,64,37,65,66.

Sincerely yours

Dan Clarion, Tribal Administrator.

December 23, 2019

Alaska Board of Fisheries
1255 West 8th St.
P.O. Box 115526
Juneau, AK 99811

Re: Maintain Kodiak's Salmon Fishery
Oppose Proposals: 58,59,60,61,62,63,64,65,37 &66

Dear Alaska Board of Fisheries:

I am the President of the Port Lions Traditional Tribal Council and I represent Native Village of Port Lions (Tribe) in the community of Port Lions. Our community's economy is entirely based on fishing and on Kodiak's salmon fishery in particular. Loss of salmon fishing opportunities will have a direct impact on Port Lions.

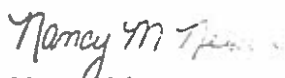
We wonder what Kodiak fishermen have done that would justify changing our management plans. Our salmon fishery has not expanded, in fact there are fewer permits fishing now than were fishing five and ten years ago. We don't see any "new" fisheries for Kodiak salmon developing. Kodiak's management plans cover the entire Island and the Mainland and they only allow fishing openings based on the presence of local stocks. These plans have been in place for more than 25 years and have precluded expansion of salmon fishing that is not based on the presence of local stocks.

The 2014-1016 genetic study authored by Kyle Shedd in not "new" information in the sense that the conclusions were not previously known. The genetic study provides additional snapshots of detail illustrating the information and conclusions reached by the Department during the 1990-1995 time-frame. Namely, **"The incidence of Cook Inlet sockeye in KMA fisheries varies widely. It is inconsistent as to area, annual timing, and between years."** Moreover, the percentage of the Cook Inlet run incidentally captured in the Kodiak fishery during the 2014-16 time period is well with the ranges suggested by these earlier studies.

The Cape Igvak Management Plan has been in place for 40 years. The reason for the plan was conservation --- to protect Chignik's late run. Prior to the plan, Kodiak fished at Cape Igvak "day for day" when the Chignik fishery was open. While Chignik was fishing on the "early run", it was thought that Kodiak could be impacting the "late run". Consequently, the Cape Igvak management plan insured both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting Kodiak. Kodiak's catch percentage of the Chignik run prior to the Cape Igvak Management Plan was about 15%. Under the plan, Kodiak has averaged about 12%. (During years when fishing has occurred.) Finally, the conservation aspects of the Cape Igvak Management plan were highlighted with Chignik's recent run failures. There was no fishing at Cape Igvak! Why change a balanced plan that is accomplishing its intended purposes?

In summary, the Native Village of Port Lions request that the Board of Fisheries take no action on Proposals 58, 59,60,61,62,63,64, 65, 37 & 66!

Respectfully,


Nancy Nelson
President



Nick Katelnikoff
Box P.O. Box 29
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Reject Proposals 58,59,60,61,62,63,64,65,66 and 37

Board Members:

I have been a salmon fisherman in Ouzinkie all of my life. My crew is always from Ouzinkie. I support several families that live in Ouzinkie. My boat, the "Lady J" is competitive all over the island and I frequently fish at Cape Igvak when it is open. I strongly believe that the Cape Igvak management plan created an imbalance between Chignik and Kodiak. Before we use to fish day for day with Chignik. If we were doing that now, we would be catching allot more fish. The Cape Igvak management plan gives Chignik 300,000 fish before we can fish on the early run and 600,000 fish before we can fish on the late run. Three of the past five years we didn't fish at all. Seems to me that Kodiak got the short end of the Cape Igvak plan. It doesn't make sense that Chignik is still asking for more.

In 2018 Chignik had a bad year. Chignik's problems that year could not have been fixed by doing anything more at Cape Igvak. The Cape Igvak fishery was completely closed. If there are no surplus fish returning to Chignik, there is no Cape Igvak fishery. Chignik should not be using the 2018 hardship to justify changes at Cape Igvak. That's not honest. We hope the Chignik system will go another 37 consecutive years of meeting escapement goals. Please leave the Cape Igvak fishery the way it is and manage under current management plans.

I also don't see why the Board would want to make any regulation changes because of Cook Inlet fish. Migrating Cook Inlet sockeye haven't been fenced into the Kodiak area. And Kodiak fishermen are not "rustlers" crossing into Cook Inlet to steal fish. Nature, from time to time, allocates an unknown portion of Cook Inlet stocks to mix with Kodiak's local stocks. The GSI study cannot answer the crucial question of when, where and why Cook Inlet salmon appear in Kodiak waters. Every few years we have to face this whole issue again. When will it stop? I'm getting old and I want you to keep the Kodiak salmon fishery so my kids can use my boat and continue to make their living fishing.

Thank You for Considering My comments,

Nick Katelnikoff



Northwest Setnetters Association
P.O. Box 870
Kodiak, AK 99615

December 21, 2019

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

RE: Opposition to proposals 63, 64, 65, 37 and 66

Dear Chairman Morisky and members of the Board of Fisheries,

Thank you for the opportunity to comment on these proposals in advance of the Board meeting for Kodiak. The Northwest Setnetters Association (NWSA) respectfully requests you oppose proposals 63, 64, 65, 37 and 66 as they present unnecessary change to an already fine-tuned and very complex management plan for the Kodiak Management Area (KMA) salmon fishery.

Northwest Setnetters Association is comprised of over 100 active SO4K permit holders and crewmembers of which the vast majority have been family run operations for many years and passed down to family members through the generations.

Members of NWSA find themselves once again at a regular 3-year cycle of the Alaska Board of Fisheries in a defensive position regarding incidental catch of salmon bound for Cook Inlet. These proposals have been brought forth by the same Cook Inlet fishing groups of years past. The results of this repetitive attack on the KMA harvest strategy are many. Firstly, it effectively deprives Kodiak stakeholders from addressing their own issues, as we are put in the position once again of defending the KMA in regards to incidental catch of Cook Inlet salmon. As long as salmon have been harvested in Kodiak, Cook Inlet bound salmon have been harvested incidentally. This incidental harvest will continue as long as there is a commercial salmon fishery in Kodiak.

Northwest setnetters fish exclusively in the Central Section of the Kodiak Management Area. All Northwest setnetters fish alongside Kodiak seiners in the Central Section, a combined gear group area. The Central Section of the Northwest District is the only area of Kodiak Island that combines both gear groups. All other Kodiak areas are seine only (attached is a map displaying these areas). That being said, setnetters in the Central Section work in a highly competitive and crowded area. Every one of the proposals put forth by Cook Inlet groups or individuals, if adopted, will severely increase the seine effort in an already congested mixed gear group area. The setnetters in the Central Section will clearly be the greatest losers if any of these draconian restrictions are mistakenly adopted in an effort to protect Cook Inlet bound salmon.



It is very important to be aware of the fact that Northwest Setnetters are very busy harvesting local Kodiak stocks of pink, chum and local sockeye salmon during the time periods that Cook Inlet groups and individuals are proposing restricting our fishing times and historical fishing locations. This is also a time that NW Setnetters are harvesting enhanced Spiridon Bay bound sockeye stocks from our Kodiak Regional Aquaculture Association. These stocks are paid for from every Kodiak commercial salmon fishermen's enhancement tax. Any change or reduction in our setnet opportunity, along with increased seine pressure in our only area, during these significant time periods, could result in the Central Section setnet fishery being compromised.

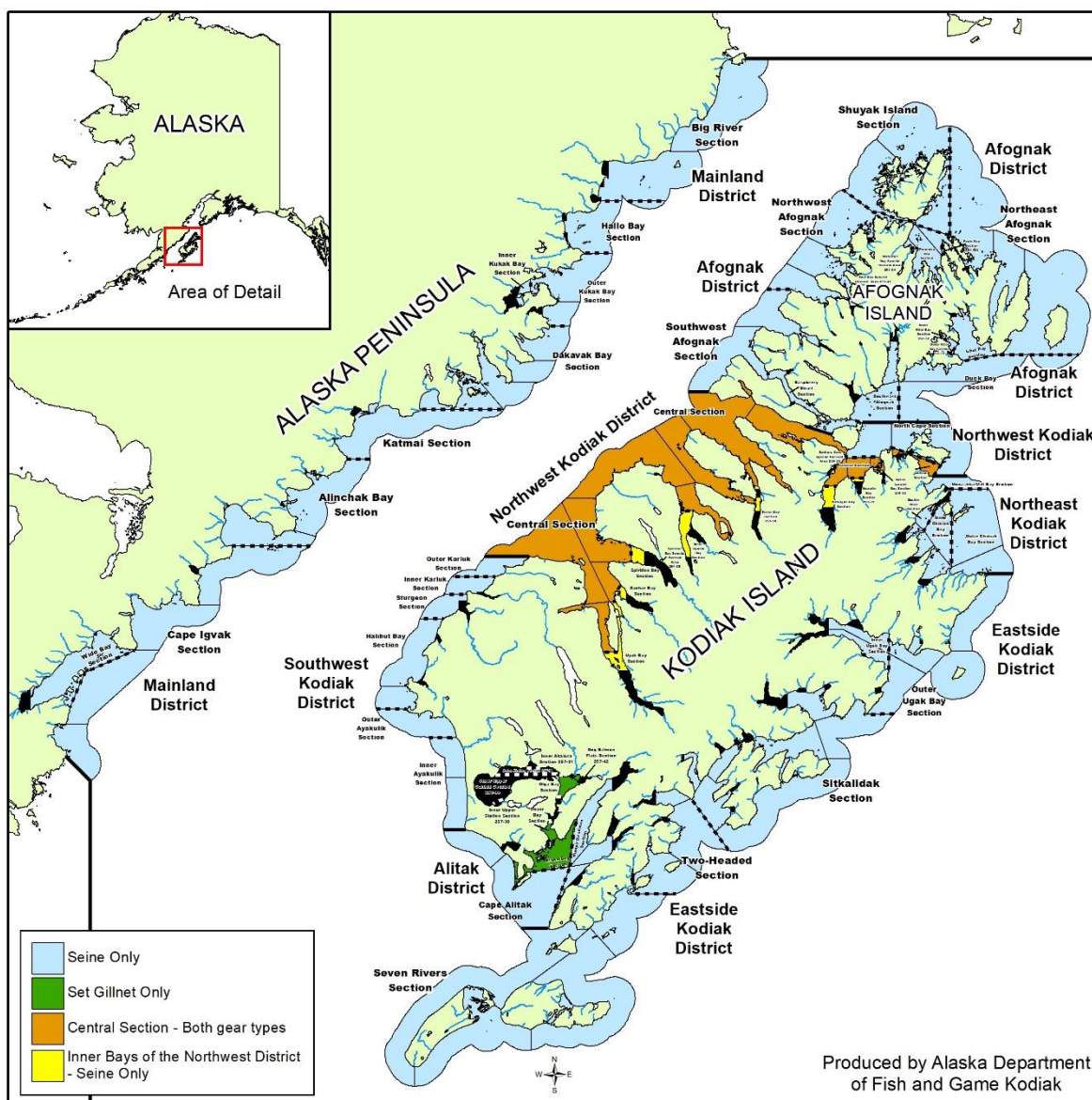
We as Northwest Setnetters, fishing exclusively in the Central Section of Kodiak, believe the continuous attacks on our KMA plan by Cook Inlet groups and individuals should stop. We seem to have to rally our troops and consolidate our efforts to defend ourselves against the constant threat brought forth by Cook Inlet fishing groups. Our fishery and gear group of set netting has not changed since its inception. Every BOF cycle we look at Cook Inlet groups proposing extreme restrictions to our fishing time and opportunities which are already limited by our very congested and competitive area.

Please remember the KMA is a very complex area and is tightly managed for Kodiak's own local stocks. There are hundreds of salmon streams on the Island of Kodiak as well as roughly a dozen sockeye systems that have run timings that span over 4 months during the summer. Trying to manage our own local stocks and at the same time trying to manage for non-local stock incidental harvest would create many problems. Kodiak fishermen are already sharing the conservation burden with the North Shelikof Management Plan that was agreed upon and adopted years ago.

We respectfully ask the Board to reject proposals 63, 64, 65, 37 and 66 and protect Kodiak's Management Plan. There does not appear to be anything of substance that the Board can look at regarding allocation criteria that justifies a change to the KMA plan.

Sincerely,

Mark Beardsley
President - Northwest Setnetters Association





IN REPLY REFER TO:

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

OSM 19093.GP

DEC 20 2019

Mr. Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Morisky:

The Alaska Board of Fisheries (Board) will deliberate 2019/2020 regulatory proposals that address Kodiak Area Finfish fisheries, among other issues, beginning January 11, 2020. The Office of Subsistence Management (OSM) have reviewed the proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has reviewed these proposals and is providing the enclosed comments for three proposals which, if adopted, may have impacts on Federally qualified subsistence users in this area. We may wish to comment on other proposals, if issues arise during the meeting.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle
Acting Assistant Regional Director



Chairman Morisky

2

cc:

Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director,
Office of Subsistence Management
Suzanne Worker, Acting Subsistence Policy Coordinator, Office of Subsistence Management
Robbin La Vine, Acting Anthropology Division Supervisor
Office of Subsistence Management
Tom Kron, Acting Supervisor Program Analyst, Office of Subsistence Management
DeAnna Perry, Subsistence Council Coordinator, U.S. Forest Service
Southcentral Subsistence Regional Advisory Council
Doug Vincent-Lang, Commissioner, Alaska Department of Fish and Game
Glenn Haight, Executive Director, Alaska Department of Fish and Game
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



Recommendations

ALASKA BOARD OF FISHERIES PROPOSALS

KODIAK MANAGEMENT AREA

OFFICE OF SUBSISTENCE MANAGEMENT

January 11 – 14, 2020

Kodiak, Alaska



PROPOSAL 45 seeks to modify the boundaries of the Kodiak Road Zone (KRZ) salt waters in State sport fishing regulations.

5 AAC 64.005. Description of the Kodiak Area.

Amend the boundaries of the Kodiak Road Zone salt waters.

CURRENT FEDERAL REGULATIONS.

§100.3 Applicability and scope.

(1) Alaska Maritime National Wildlife Refuge, including the:

(i) Karluk Subunit: All of the submerged land and water of the Pacific Ocean (Sheliokof Strait) extending 3,000 feet from the shoreline between a point on the spit at the meander corner common to Sections 35 and 36 of Township 30 South, Range 33 West, and a point approximately 1¼ miles east of Rocky Point within Section 14 of Township 29 South, Range 31, West, Seward Meridian as described in Public Land Order 128, dated June 19, 1943;

(ii) Womens Bay Subunit: Womens Bay, Gibson Cove, portions of St. Paul Harbor and Chiniak Bay: All of the submerged land and water as described in Public Land Order 1182, dated July 7, 1955 (U.S. Survey 21539);

(iii) Afognak Island Subunit: All submerged lands and waters of the Pacific Ocean lying within 3 miles of the shoreline as described in Proclamation No. 39, dated December 24, 1892;

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§.27(e)(9)(v)

(9)(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(A) In the Federal public waters of Kodiak Island, east of the line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within 1 mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same



household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

§100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) *Definitions.* The following definitions apply to all regulations contained in this part:

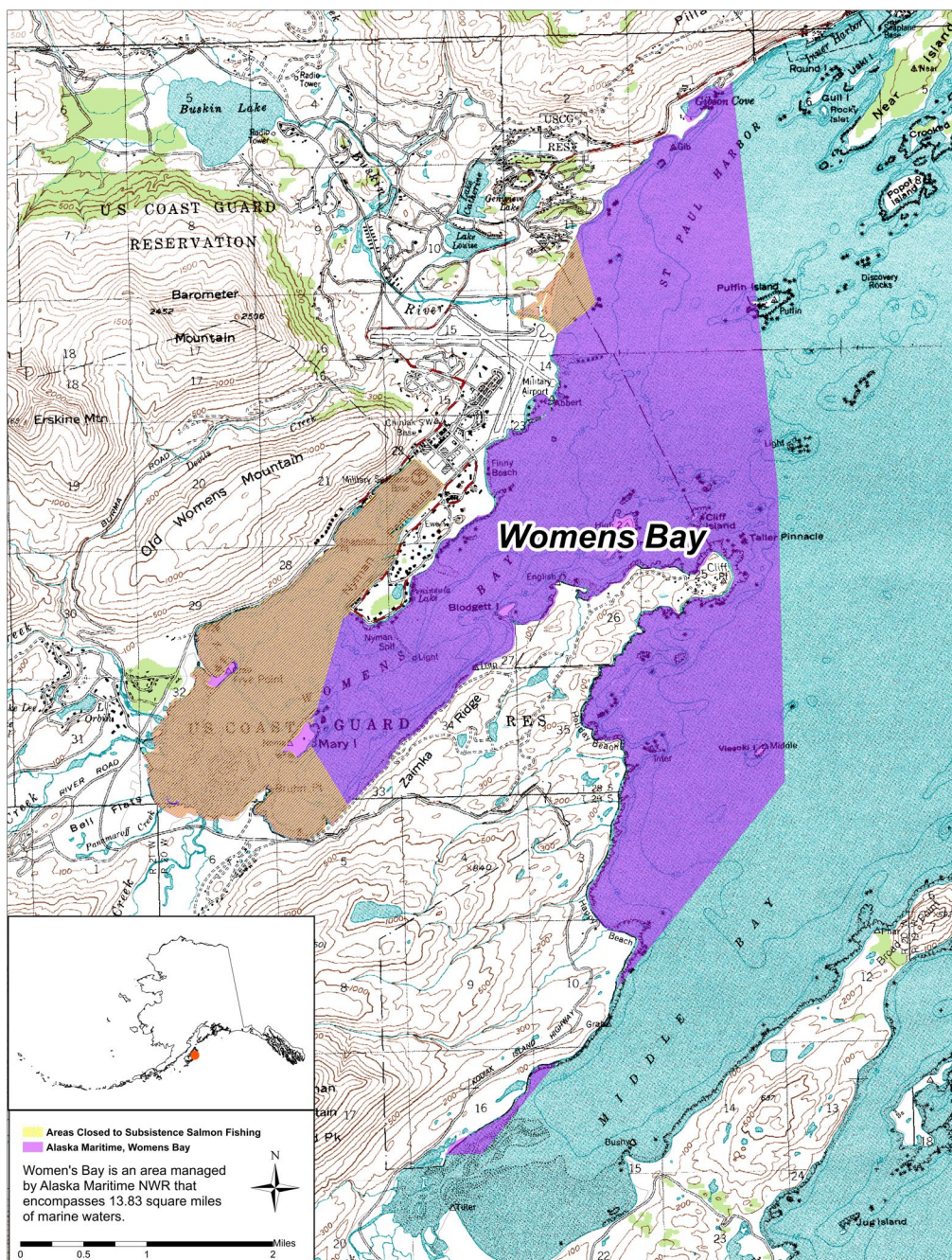
Groundfish or bottomfish means any marine fish except halibut, osmerids, herring, and salmonids.

Impact to Federal subsistence users/fisheries: Minimal. Adoption of this proposal is unlikely to impact Federally qualified subsistence users fishing in the waters under Federal subsistence fisheries jurisdiction contained with the existing KRZ (see page 2)(**map 1**). Within approximately .375 mile radius of the wedge-shaped arc of waters around Cliff Point (57° 43.512'N, 152° 26.622'W) east, excluding the KRZ from State sport fisheries management will not change Federal subsistence fisheries jurisdiction or the Federal subsistence fisheries.

Adoption of this proposal would change the State sport fisheries area status from KRZ to marine waters in some areas. Thus, the marine waters under Federal subsistence fisheries jurisdiction near Cliff Point could be restricted if a future conservation concern develops for any fish population managed under Federal subsistence regulations (salmon, herring, groundfish and bottomfish).

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: OSM provided comments on this proposal strictly as reference materials for managers. The likelihood of a substantial fisheries restriction with the “wedge” of waters off of Cliff Point is very low and because no Federal subsistence effort or harvest has been reported or recorded in this specific area.



Map 1. Marine waters of Womens Bay area under Federal subsistence fisheries jurisdiction.

PROPOSAL 46 seeks to establish a Chinook Salmon catch and release (only) sport fishery in the Dog Salmon River watershed from January 1 through July 25. The use of bait would be prohibited between July 1 and July 25.



CURRENT FEDERAL REGULATIONS.

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§.27(e)(9)(i)

(i) You may take fish other than salmon, rainbow/steelhead trout, char, bottomfish, or herring at any time unless restricted by the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence net fisheries, you may retain them for subsistence purposes.

(ii) You may take salmon for subsistence purposes 24 hours a day from January 1 through December 31, with the following exceptions:

(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

(viii) You may take salmon only by gillnet, rod and reel, or seine.

Impact to Federal subsistence users/fisheries: Unknown. Introducing an inriver catch and release only sport fishery with decreasing escapements of introduced but self-sustaining spawning population of Chinook Salmon may lead to conservation concerns for the run if the escapement is low (e.g. 17 total fish in 2019) and interest in the proposed fishery is realized. It is difficult to ascertain the total mortality that a catch and release fishery may cause in this remote and difficult to access area of Kodiak. Angler participation in the proposed fishery is not expected to increase because of the small escapement and remoteness of the drainage. However, during a time of low Chinook Salmon abundance, locally and statewide (e.g. less than 100 fish on average annually over a 10-year period for the Dog Salmon watershed) the proposed fishery may experience ebbs and flows of interest which may cumulatively result in a conservation concerns for the Chinook Salmon return. Introduction of a targeted catch and release fishery could lead to challenges for future continuance of subsistence uses for Federally qualified users if the population is at low levels due to minimal escapement.

The 2019 weir count was 17 total Chinook Salmon, which raises significant concerns about developing a catch and release fishery that results in additive mortality. No population estimates are available for this stock of Chinook Salmon, which may experience times of significant exploitation rates from the local and regional commercial fisheries prior to entering the proposed sport fishery area.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal.



Rationale: OSM opposes developing a catch and release sport fishery for Chinook Salmon in the Dog Salmon watershed in Olga Bay. Few, if any, examples of an inriver sport fishery directly targeting a wild population of Chinook Salmon with an average escapement of less than 100 fish exists in Alaska, much less nationwide. The size and characteristics of the Chinook Salmon return to the Dog Salmon watershed is unknown, and there is currently no escapement goal. OSM opposes this proposal based on the potential for conservation concerns, violation of recognized fish and wildlife management principles, and the potential to negatively affect subsistence uses by Federally qualified subsistence users. During times of Chinook Salmon low abundance, restrictive management actions have been implemented in many of the fisheries across Alaska.

PROPOSAL 48 - 5 AAC 28.466. Kodiak Area Rockfish Management Plan; and 5 AAC 64.XXX. New section.

Establish a management plan for the Kodiak Area rockfish sport fishery and a guideline harvest range for the Kodiak Area commercial rockfish fishery, as follows:

Current Federal Regulations:

§100.14 Relationship to State procedures and regulations.

(a) State fish and game regulations apply to public lands and such laws are hereby adopted and made a part of the regulations in this part to the extent they are not inconsistent with, or superseded by, the regulations in this part.

§100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions. The following definitions apply to all regulations contained in this part:

Groundfish or bottomfish means any marine fish except halibut, osmerids, herring, and salmonids.

§__. 27(b) Subsistence taking of fish.

(16) Unless specified otherwise in this section, you may use a rod and reel to take fish without a subsistence fishing permit. Harvest limits applicable to the use of a rod and reel to take fish for subsistence uses shall be as follows:

(i) If you are required to obtain a subsistence fishing permit for an area, that permit is required to take fish for subsistence uses with rod and reel in that area. The harvest and possession limits for taking fish with a rod and reel in those areas are the same as indicated on the permit issued for subsistence fishing with other gear types.



(ii) Except as otherwise provided for in this section, if you are not required to obtain a subsistence fishing permit for an area, the harvest and possession limits for taking fish for subsistence uses with a rod and reel are the same as for taking fish under State of Alaska subsistence fishing regulations in those same areas. If the State does not have a specific subsistence season and/or harvest limit for that particular species, the limit shall be the same as for taking fish under State of Alaska sport fishing regulations.

§__.27(e)(9) Kodiak Area...

(i) You may take fish other than salmon, rainbow/steelhead trout, char, bottomfish, or herring at any time unless restricted by the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence net fisheries, you may retain them for subsistence purposes

(iv) You must have a subsistence fishing permit for taking salmon, trout, and char for subsistence purposes. You must have a subsistence fishing permit for taking herring and bottomfish for subsistence purposes during the State commercial herring sac roe season from April 15 through June 30.

(vii) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/fisheries: Yes. Adoption of this proposal may contribute to the conservation of the rock fish populations in the Women's Bay and Gibson Cove area, both of which are within the Chiniak Bay area, as well as the marine waters surrounding Afognak Island. Adoption of this proposal may help reduce future conservation concerns and challenges to the continuation of subsistence uses through sound management and help rebuild fish populations.

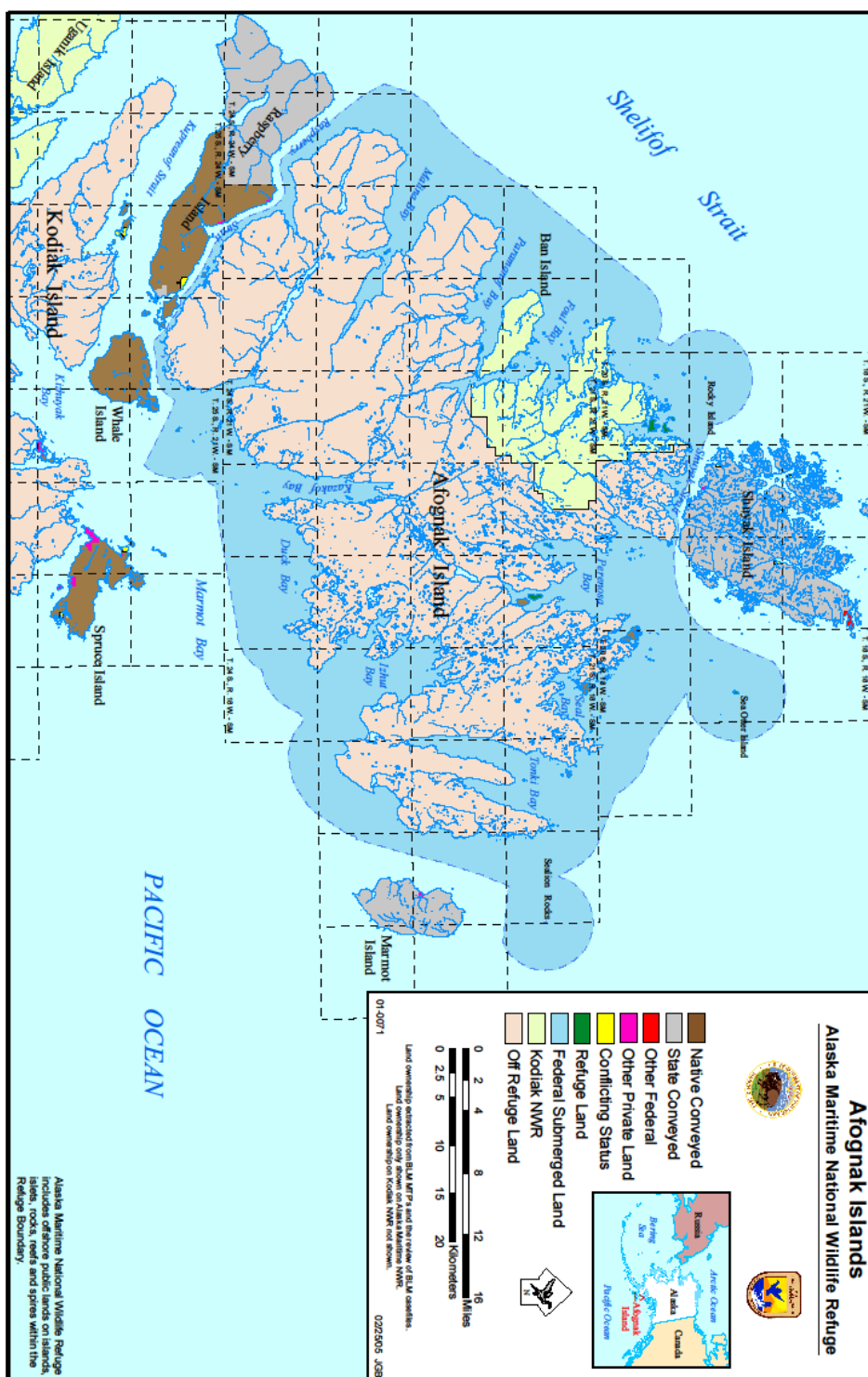
Federal Position/Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: The Alaska Department of Fish and Game statewide harvest survey data estimates that approximately 105,000 total rock fish have been harvested in one Chiniak Bay sport fishery (from boats) between 2006 through 2015 (range 5,040 – 18,570 fish). The estimated harvest for the Woman's Bay and Gibson Cove portion of Chiniak Bay are not available. A reduction in overall mortality rates of rock fish by restricting the sport fishery catch and possession limits may assist with ensuring long-term sustainability of the resource. Conservation measures mirroring commercial fisheries regulations may also assist with the rebuilding effort.



The current Federal subsistence fisheries rock fish harvest limits are the same as the State subsistence fishery limits, which are 2 ling cod and 10 rock fish per day. The Federal subsistence fishery requires a permit and annual reporting when fishing for herring or bottomfish between April 15 and June 30 (the commercial herring fishing season). The State subsistence fishery does not require a permit or harvest reporting for rockfish in Kodiak area.

To date, no rock fish harvest has been reported from waters under Federal subsistence fisheries jurisdiction by Federally qualified subsistence users. If warranted, the Federal inseason manager may reduce the catch and possession limits of rock fish in the Federal subsistence rod and reel fishery in Woman's Bay, Gibson Cove and in the marine waters encompassing Afognak Island (**Maps 1 and 2**); may restrict participation in the fisheries through the Federal Subsistence Board to a subset of Federally qualified users only through the Section 804 process; or may close all fisheries for conservation purposes or to ensure future continuance of subsistence uses by Federally qualified users.



Map 2. Marine waters encompassing Afognak Island under Federal subsistence fisheries jurisdiction.

December 19, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Opposition to Proposals 58,59,60,61,62,63,64,37,65,66

Dear Alaska Board of Fisheries:

Ouzinkie Native Corporation (ONC) represents shareholders that originated in the fishing community of Ouzinkie. Ouzinkie's salmon fleet developed during the earliest days of Kodiak's salmon fishery. In fact, before the 1964 earthquake, there were two salmon processing plants operating in Ouzinkie. Although our salmon fleet has diminished over the years, salmon fishing is still the primary source of income for several local vessels and their crews. ONC has worked hard to energize Ouzinkie's fisheries economy. We advocated for reductions of salmon and halibut bycatch, limited bottom trawling in Marmot Bay and helped purchase community owned halibut quotas. Because of our long-term involvement supporting and encouraging Ouzinkie fisheries, it's particularly aggravating to see proposals from Chignik and Cook Inlet trying to take fishing opportunities away from Ouzinkie's salmon fishermen. Ouzinkie Native Corporation urges you not to let this happen!

Regarding the Cape Igvak issues, Ouzinkie understands how many folks living in Chignik are feeling. Several families in our two communities are related. We are all hurting trying to earn a living from fishing and live in isolated communities. But us residents of rural communities need to be working together rather than fighting each other. If the Cape Igvak management plan was contributing to under-escapement in Chignik or taking fish away from Chignik fishermen before they had a chance to fish, Ouzinkie would agree that it needed changing. But the Cape Igvak management plan does NOT impact escapement and it economically protects Chignik fishermen, so they earn in excess of \$2,500,000 before any fishing takes place at Cape Igvak. Consequently, despite Ouzinkie's understanding of Chignik's economic woes, Ouzinkie Native Corporation strongly suggests that the Cape Igvak management plan did not contribute to Chignik's salmon run problems and eliminating or altering the plan will not help solve these problems.

Commercial fishing at Karluk predates the Bristol Bay, Chignik and Cook Inlet salmon fisheries. Many Ouzinkie residents would travel to Karluk in the early days to work the beach seines and process salmon. Ouzinkie fishermen had often been told that, in some years, there a "middle run" to Karluk. We now know that the middle run is now local stocks enhances with the presence of Cook Inlet sockeye in the Kodiak area. Ouzinkie fishermen have also experienced another constant during the past 150 years. We have not been able to accurately predict when Cook Inlet sockeye may be present in the Kodiak area and where those fish may appear --- and we've tried hard to do so.

The unpredictability of Cook Inlet stocks in the Kodiak area is clearly illustrated in the recent Kodiak sockeye genetic stock ID study from 2014-16. (Shedd) The genetic study showed wide variation in the amount of Cook Inlet bound sockeye captured in the Kodiak area and substantial differences between years regarding when and where Cook Inlet sockeye were caught. In each year, in almost all areas and

time frames, local sockeye with local pinks, chum and Coho far exceeded catches of non-local stocks. Moreover, even for a high catch year like 2015, the study showed Cook Inlet catches in the Kodiak area to be within ranges predicted in the 1990s. In summary, ONC does not see that additional regulation in the Kodiak Management Area for Cook Inlet is practical or needed.

Changing the Cape Igvak management plan or imposing more Kodiak area closures because of Cook Inlet's concerns directly impacts Ouzinkie fishermen. Our fleet mostly fishes in proximity to the village and Ouzinkie fishermen only occasionally travel to Cape Igvak. However, when Cape Igvak is open 30-40 Kodiak boats fish over there and Ouzinkie fishermen have much more opportunity to catch fish in our traditional areas. Additional closures along the Shelikof because of possible Cook Inlet sockeye will also result in more boats competing with the Ouzinkie fleet and further eroding fishing opportunity. You'll just cram the same number of vessels into a smaller area!

Be aware of unintended consequences. When the North Shelikof management plan was adopted in 1989 the Southwest Afognak section reverted to cape to cape closures if the sockeye cap was hit. The cape to cape closures really hit the Ouzinkie fleet because of our extensive fishing, "homesteading", in the Southwest Afognak area. Subsequently, the Board recognized the hardship imposed on Ouzinkie fishermen and provided a ½ mile corridor (one set out) for fishing in the S.W. Afognak section.

In contrast to the proposals at hand, the Ouzinkie Native Corporation asks the Board to partner with us to expand and enhance salmon fishing opportunities for Ouzinkie residents. Our limited entry system inhibits village kids from entering our salmon fisheries and our regulatory structures require immediate competitiveness to survive in the fishery. ONC would like to initiate discussions with the Board to consider some Local Area Management Plans, LAMPS, that would provide limited salmon fishing opportunities to a defined set of Ouzinkie and Port Lions (Afognak) residents. Eliminating the Cape Igvak fishery or imposing more Cook Inlet related closures will only accelerate Ouzinkie's sense of urgency to have the Board address community specific fisheries.

Ouzinkie Native Corporation remembers the Board's attentiveness and responsiveness to our requests during the last Board cycle. We had asked the Board to create a subsistence harvest zone in the harbor area next to Ouzinkie. Although the strength of the local sockeye run has gone up and down, the subsistence zone has been a big success. Thank You!

We trust the Alaska Board of Fisheries is clear regarding Ouzinkie Native Corporation's strong opposition to making changes to the Cape Igvak Management Plan and to changing any Kodiak management plans because of the possible presence of Cook Inlet stocks. Vote NO on these proposals and partner with Ouzinkie Native Corporation to envision and build a stronger fisheries-based economy for Ouzinkie.

Very truly yours,



Darren Muller, Sr.
Board Chair



12/27/19

Mr. Chairman and Members of the Board,

I cannot overstate the devastating consequences, both financially and culturally, that Chignik is burdened with. And still, our future in Chignik looks grim, the preliminary forecast is for 586k total harvestable sockeye. That is below the 600K harvest minimum afforded Chignik at present. That is less than \$70K boat gross on average. With conservative figures of \$13k insurance, \$15k fuel, \$4k for 3months groceries, \$8k gear/supplies, \$21K to crew , and \$3.5k 5% fish tax leaves \$5,500.00 for the boat wear and tear and captain. It's not enough even if the 600k sockeye harvest preference was met. The prospect of a \$7,000.00 crewshare isn't even enough to secure crew for 3 months. Local hire and their families must move with no other industry to fall back on. Cod is faltering, halibut and other species can't be processed locally because there is not enough salmon to entice a shore-based processor. Historically, we had three or more processors (shore based). Because of all this, I support Proposal 61.

In 2018, salmon fishermen in Chignik didn't fish, had zero income, and went backwards with mounting bills.

2019 was poor with no fishing until after July 20th and the poor escapement precluded harvests on the capes of prime pinks and chum. The 638K harvested in 2019 was barely sufficient and only because about 25% of the permits/boats went elsewhere to fish salmon or didn't fish at all fearing more debt load.

The dynamics of the community is crumbling. More families (some with children) are relocating out of Chignik after this year to find employment. An above average amount of bills to the City of Chignik go unpaid. The only reason food was not scarce was from the charity of UMCOR (United Methodist Committee on Relief) who by the grace of God directly donated food with shipping to all five communities. Staffing at the City Office is often short and likewise the school attendance is nearly insufficient. If the school closes, it will add to the hardships of those remaining. Chignik is reeling from economic disaster and the generational fishing way of life is dwindling away. There is no other industry in Chignik to support its existence.

If there is any hope for Chignik, if in the future if there is a good salmon return, then Chignik needs to reap those benefits to make up for the "negative balance sheet" so to speak.

Kodiak seiners have averaged a greater boat gross than Chignik in 11 of the last 15 years. The 40 sockeye runs and hatcheries provide good returns and economic stability. If the Igvak allocation were lowered to 5% it would impact the roughly 176 seiners by about 2% exvessel value, but would give direct relief to Chignik fisherman along the lines of 7-8% increased income per boat. It would also make it less necessary to take large percentages of the Black Lake stock to reach the allocation as in 2016 when Igvak caught 19% (4% over allocation). The Chignik runs have been so poor in the last 15 years that Igvak hasn't even opened 1/3rd of the years.

There is a shift in the needs of the two areas today than when the Igvak management Plan was implemented. Kodiak has stability, many processors, 40 robust runs, hatcheries, and other industry. Chignik and it's fishery is collapsing. For the above reasons I support Proposal 60.



When the Igvak management plan was created it was thought there were not enough permits awarded to Chignik but it would be better to redistribute the catch rather than increase the permits. This has wronged Chignik since inception, robbing it of economic basis to build its communities. That income should have gone to the families in Chignik and the fish to the local processors. Instead the families and processors have painfully dwindled away. Until, the communities and fishery in Chignik recover, the Igvak allocation should be 0%. Citing transcripts from 1977-1978 Igvak Board Meetings:

Jim Beaton suggests that the difference between Kodiak income and Chignik income is great enough to trigger a limited entry problem that could result in the state giving or selling more Chignik permits that could expand the Chignik fleet to 150. He states that it is in Chigniks long term interest to give up this allocation now rather than end up with half later. Jim Beaton states that the Kodiak people have found a way to use the Board to get a piece of the Chignik action but hopefully a small portion and that if it gets out of hand he is willing to take a hard look at doing away with Igvak in the future. After having voted 4/2 in support of the concept of allocating 15% in December of 1977 the Board voted 6/0 at this meeting in April of 1978 to approve the management plan.

In the future Chignik is facing a poor forecast in 2020, and there is doubt about the returns from the failed 2018 and 2019 runs. Redistributing the Igvak catch would be of nominal impact to Kodiak but would magnanimously help Chignik's people in their economic recovery. With that I would ask you take favorable action on 59, 60, and 61. I also support actions on the mainland proposals 63, 64, and 65 that minimize interception of nonlocal stocks as a poor quality/weakness of return is prevalent in many terminal areas and seems to be on the increase. Whether from climate change or increased interception fishing pressures or both, damage should be prevented.

In closing, my daughter approached my husband and I as we discussed the preliminary Chignik forecast for 2020. She asked, "Will there be fishing in Chignik next summer?" We answered "maybe". Then with her 11-year-old wisdom she exclaimed "If we don't fish, how will anyone make money? We'll all have to leave." For us it really is that simple, but I realize that complexities exist from your perspective. So, thank you for your time and thoughtfulness in these matters. It is appreciated.

Sincerely,

Raechel Allen



RE: PROPOSAL 58-61

A Chignik CFEC seine permit is worth 4 times the value of a Kodiak seine permit. Reject this proposal.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY



PC573
2 of 8

Commercial Fisheries Entry Commission

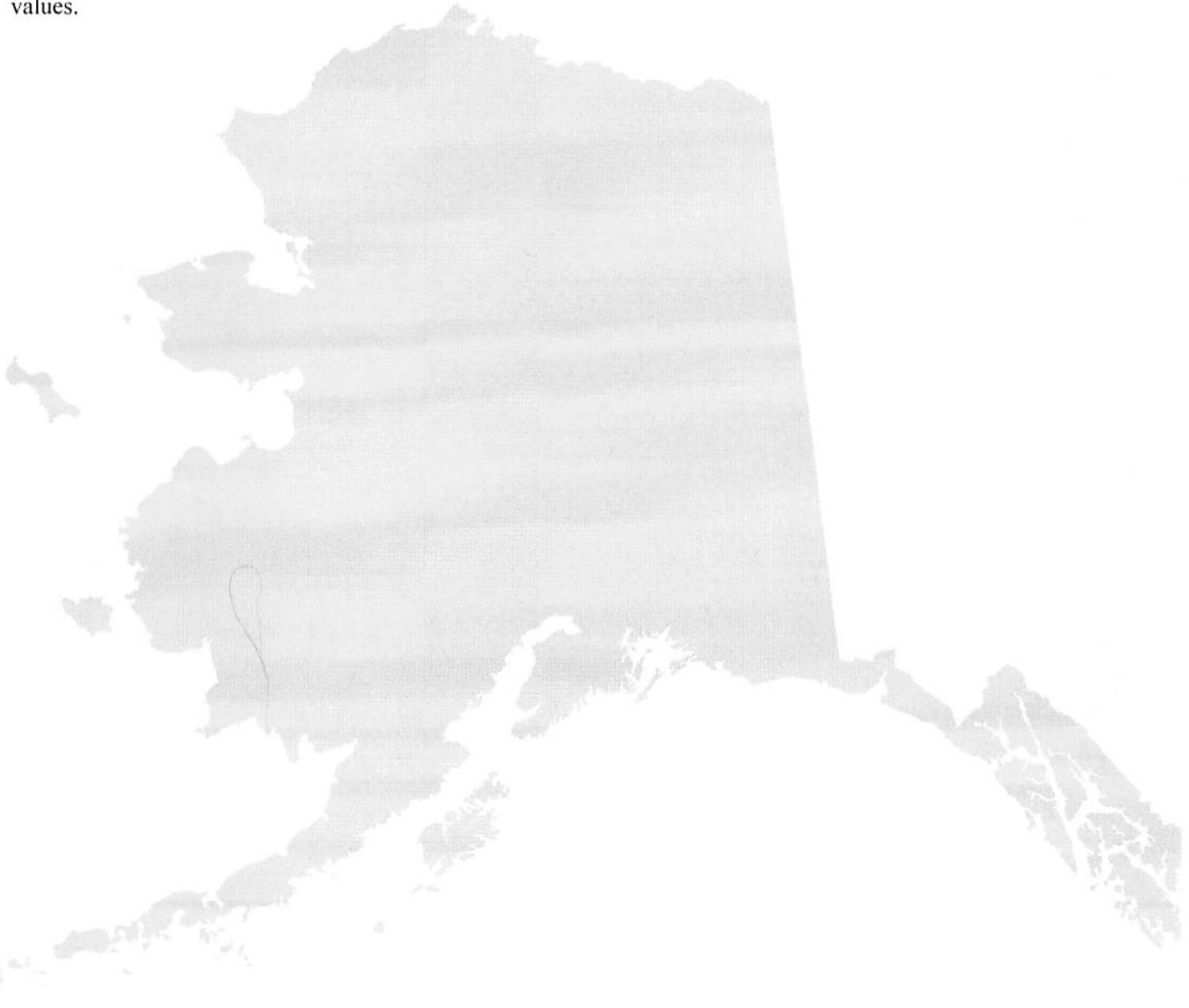
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Juneau, Alaska 99811-0302
Main: 907.789.6160
Licensing: 907.789.6150
Fax: 907.789.6170
www.cfec.state.ak.us

December 20, 2019

S01K Kodiak, Salmon, Purse Seine, most current (November 2019) estimated value is \$34,000

S01L Chignik, Salmon, Purse Seine, most current (November 2019) estimated value is \$136,400

Please see attached explanation of how these estimates are acquired and the last 4 or more years of values.





CFEC - Permit Value Table Description

> Fishery Statistics

PERMIT VALUE

TABLE DESCRIPTION: This table contains estimated values for permanent permits in Alaska’s limited fisheries. The estimated values were calculated from actual permit sales as reported on the Commercial Fisheries Entry Commission’s transfer survey. In general, permit value estimates for each limited fishery are created by calculating the average purchase price of transfers that occurred in the last three months. The value is calculated on a monthly basis.

By statutes and regulation, the financial data reported on the CFEC permit transfer surveys are confidential and cannot be disclosed to the public. For reporting purposes, permit value estimates must be averages from at least four transactions. In some fisheries, permit transfers are not common occurrences. In these instances, transactions that occurred before the three most recent months must be included in order to reach the four-transfer minimum. In some limited fisheries four market transfers do not exist; therefore a permit value cannot be estimated for these fisheries.

Year-end averages are calculated and include transactions that occurred between January and December for each year. Where fewer than four transactions occur in a year, additional data from earlier months are included until an adequate number of observations are obtained to meet confidentiality requirements.

The table contains the following information:

PERIOD

The month, year, or quarter for which the estimated value applies. Estimated values are currently determined monthly. Prior to 1985, estimated values were calculated on a quarterly basis.

ESTIMATED VALUE

An estimate of the value of permit transfers during the period specified based on the average price of actual sales transactions.

RANGE

The difference between the highest and lowest values used to calculate the estimated value. Range is indicated from 1991 to present.

STANDARD DEVIATION

A measure of the variance from the estimated value, the average purchase price of transfers. Standard deviation is indicated from 1991 to present.

MAXIMUM VALUE

Prior to 1991, maximum value is listed. Maximum value is the highest value used in the calculation of the estimated value and is used with the minimum value to indicate the range of values used to calculate the estimated value. A “.”



indicates that less than four transactions occurred during the three month period and no value can be displayed.

MIMIMUM VALUE

Prior to 1991, minimum value is listed. Minimum value is the lowest value used in the calculation of the estimated value and is used with the maximum value to indicate the range of values used to calculate the estimated value. A "." indicates that less than four transactions occurred during the three month period and no value can be displayed.

EARLIEST/LATEST TRANSACTIONS

Permit transactions occurring from the earliest month shown through the latest month shown, inclusive, were used to calculate the estimated value.

In some cases it may appear that the estimated value is calculated from transfers in just one or two months rather than the three most recent. In these situations, the current month has more than four transfers but either or both of the preceding months have no transfers. No values are included from one or both of the preceding months, so the estimated value is calculated as the average of the transfers in the most recent month.

Prior to 1987, the estimated value was calculated for the current month and two prior months. If there were fewer than four transfers, insufficient data existed to determine the estimated value. Transactions from preceding months were not added to reach the minimum required number. Earliest and latest transactions are not indicated for these years.

QUESTIONS

Questions regarding this data should be addressed to our Research Section.

Phone: (907) 789-6160

Address:

Attn: Marcus Gho
Commercial Fisheries Entry Commission
P.O. Box 110302
Juneau , AK 99802



[Click here](#) for an explanation of this report.

Alaska Commercial Fisheries Entry Commission

Estimated Permit Value Report

(S01K) SALMON, PURSE SEINE, KODIAK

Year	Month	Estimated Value	Range	Standard Deviation	Earliest Transaction	Latest Transaction
2019	NOV	\$34,000	6,000	2,700	JUL19	NOV19
	OCT	\$30,000	10,000	4,100	JUN19	SEP19
	SEP	\$30,000	10,000	4,100	JUN19	SEP19
	AUG	\$28,800	5,000	2,150	JUN19	JUL19
	JUL	\$29,300	6,000	2,000	MAY19	JUL19
	JUN	\$28,800	6,000	2,150	APR19	JUN19
	MAY	\$28,300	6,000	2,200	MAR19	MAY19
	APR	\$26,700	5,000	2,000	FEB19	APR19
	MAR	\$27,000	5,000	2,300	JAN19	MAR19
	FEB	\$26,700	5,000	2,350	NOV18	FEB19
	JAN	\$26,700	5,000	2,350	OCT18	JAN19
2018	ALL	\$26,800	5,900	2,400	JAN18	NOV18
	DEC	\$26,000	2,000	1,100	SEP18	NOV18
	NOV	\$26,000	2,000	1,100	SEP18	NOV18
	OCT	\$26,800	5,000	2,350	AUG18	OCT18
	SEP	\$26,800	5,000	2,350	MAY18	SEP18
	AUG	\$27,500	5,000	2,900	APR18	AUG18
	JUL	\$26,000	5,900	2,700	MAR18	MAY18
	JUN	\$26,000	5,900	2,700	MAR18	MAY18
	MAY	\$26,000	5,900	2,700	MAR18	MAY18
	APR	\$28,000	5,900	2,800	NOV17	APR18
	MAR	\$27,000	5,900	2,550	NOV17	MAR18
	FEB	\$28,500	4,000	1,900	OCT17	JAN18
	JAN	\$28,500	4,000	1,900	OCT17	JAN18
2017	ALL	\$27,200	7,000	2,650	JAN17	NOV17
	DEC	\$28,500	4,000	1,900	JUL17	NOV17
	NOV	\$28,500	4,000	1,900	JUL17	NOV17
	OCT	\$27,800	5,000	2,650	JUN17	OCT17
	SEP	\$26,500	5,000	2,400	JUN17	JUL17
	AUG	\$26,200	5,000	1,950	JUN17	JUL17
	JUL	\$27,000	7,000	2,850	MAY17	JUL17
	JUN	\$26,300	7,000	2,550	APR17	JUN17
	MAY	\$28,800	7,000	3,750	JAN17	MAY17
	APR	\$27,000	7,000	3,350	JAN17	APR17
	MAR	\$29,000	8,000	4,100	JUN16	FEB17





Year	Month	Estimated Value	Range	Standard Deviation	Earliest Transaction	Latest Transaction
2016	FEB	\$29,000	8,000	4,100	JUN16	FEB17
	JAN	\$32,500	15,000	6,150	JUN15	JAN17
	ALL	\$38,300	8,000	3,600	MAY15	JUN16
	DEC	\$38,300	8,000	3,600	MAY15	JUN16
	NOV	\$38,300	8,000	3,600	MAY15	JUN16
	OCT	\$38,300	8,000	3,600	MAY15	JUN16
	SEP	\$38,300	8,000	3,600	MAY15	JUN16
	AUG	\$38,300	8,000	3,600	MAY15	JUN16
	JUL	\$38,300	8,000	3,600	MAY15	JUN16
	JUN	\$38,300	8,000	3,600	MAY15	JUN16
	MAY	\$39,800	2,000	950	MAY15	JUN15
	APR	\$39,800	2,000	950	MAY15	JUN15
	MAR	\$39,800	2,000	950	MAY15	JUN15
	FEB	\$39,800	2,000	950	MAY15	JUN15
	JAN	\$39,800	2,000	950	MAY15	JUN15
2015	ALL	\$40,000	2,000	900	JAN15	JUN15
	DEC	\$39,800	2,000	950	MAY15	JUN15
	NOV	\$39,800	2,000	950	MAY15	JUN15
	OCT	\$39,800	2,000	950	MAY15	JUN15
	SEP	\$39,800	2,000	950	MAY15	JUN15
	AUG	\$39,800	2,000	950	MAY15	JUN15
	JUL	\$39,800	2,000	950	MAY15	JUN15
	JUN	\$39,800	2,000	850	APR15	JUN15
	MAY	\$40,300	2,000	950	JAN15	MAY15
	APR	\$44,000	13,000	6,050	JUN14	APR15
	MAR	\$47,100	12,000	6,500	JUN14	JAN15
	FEB	\$47,100	12,000	6,500	JUN14	JAN15
	JAN	\$47,100	12,000	6,500	JUN14	JAN15
2014	ALL	\$50,600	15,500	3,650	JAN14	OCT14
	DEC	\$50,100	11,000	5,400	MAY14	OCT14
	NOV	\$50,100	11,000	5,400	MAY14	OCT14
	OCT	\$50,100	11,000	5,400	MAY14	OCT14
	SEP	\$53,400	2,500	1,100	MAY14	JUN14
	AUG	\$53,400	2,500	1,100	MAY14	JUN14
	JUL	\$53,400	2,500	1,100	MAY14	JUN14
	JUN	\$52,200	5,000	1,800	APR14	JUN14
	MAY	\$52,500	7,500	2,700	MAR14	MAY14
	APR	\$52,000	7,500	3,250	MAR14	APR14
	MAR	\$50,300	12,500	3,600	JAN14	MAR14
	FEB	\$48,100	6,000	2,200	DEC13	JAN14
	JAN	\$47,700	7,000	2,450	NOV13	JAN14



[Click here](#) for an explanation of this report.

Alaska Commercial Fisheries Entry Commission
Estimated Permit Value Report

 **(S01L) SALMON, PURSE SEINE, CHIGNIK** 

Year	Month	Estimated Value	Range	Standard Deviation	Earliest Transaction	Latest Transaction
2019	NOV	\$136,400	46,800	21,800	MAY16	MAY18
	OCT	\$136,400	46,800	21,800	MAY16	MAY18
	SEP	\$136,400	46,800	21,800	MAY16	MAY18
	AUG	\$136,400	46,800	21,800	MAY16	MAY18
	JUL	\$136,400	46,800	21,800	MAY16	MAY18
	JUN	\$136,400	46,800	21,800	MAY16	MAY18
	MAY	\$136,400	46,800	21,800	MAY16	MAY18
	APR	\$136,400	46,800	21,800	MAY16	MAY18
	MAR	\$136,400	46,800	21,800	MAY16	MAY18
	FEB	\$136,400	46,800	21,800	MAY16	MAY18
	JAN	\$136,400	46,800	21,800	MAY16	MAY18
	ALL	\$136,400	46,800	21,800	MAY16	MAY18
2018	DEC	\$136,400	46,800	21,800	MAY16	MAY18
	NOV	\$136,400	46,800	21,800	MAY16	MAY18
	OCT	\$136,400	46,800	21,800	MAY16	MAY18
	SEP	\$136,400	46,800	21,800	MAY16	MAY18
	AUG	\$136,400	46,800	21,800	MAY16	MAY18
	JUL	\$136,400	46,800	21,800	MAY16	MAY18
	JUN	\$136,400	46,800	21,800	MAY16	MAY18
	MAY	\$136,400	46,800	21,800	MAY16	MAY18
	APR	\$167,200	120,000	55,450	FEB15	JUN16
	MAR	\$167,200	120,000	55,450	FEB15	JUN16
	FEB	\$167,200	120,000	55,450	FEB15	JUN16
	JAN	\$167,200	120,000	55,450	FEB15	JUN16
2017	ALL	\$167,200	120,000	55,450	FEB15	JUN16
	DEC	\$167,200	120,000	55,450	FEB15	JUN16
	NOV	\$167,200	120,000	55,450	FEB15	JUN16
	OCT	\$167,200	120,000	55,450	FEB15	JUN16
	SEP	\$167,200	120,000	55,450	FEB15	JUN16
	AUG	\$167,200	120,000	55,450	FEB15	JUN16
	JUL	\$167,200	120,000	55,450	FEB15	JUN16
	JUN	\$167,200	120,000	55,450	FEB15	JUN16
	MAY	\$167,200	120,000	55,450	FEB15	JUN16
	APR	\$167,200	120,000	55,450	FEB15	JUN16
	MAR	\$167,200	120,000	55,450	FEB15	JUN16



Year	Month	Estimated Value	Range	Standard Deviation	Earliest Transaction	Latest Transaction
2016	FEB	\$167,200	120,000	55,450	FEB15	JUN16
	JAN	\$167,200	120,000	55,450	FEB15	JUN16
	ALL	\$167,200	120,000	55,450	FEB15	JUN16
	DEC	\$167,200	120,000	55,450	FEB15	JUN16
	NOV	\$167,200	120,000	55,450	FEB15	JUN16
	OCT	\$167,200	120,000	55,450	FEB15	JUN16
	SEP	\$167,200	120,000	55,450	FEB15	JUN16
	AUG	\$167,200	120,000	55,450	FEB15	JUN16
	JUL	\$167,200	120,000	55,450	FEB15	JUN16
	JUN	\$167,200	120,000	55,450	FEB15	JUN16
	MAY	\$206,300	120,000	54,850	JUN14	MAY16
	APR	\$227,500	35,000	14,450	APR14	FEB15
2015	MAR	\$227,500	35,000	14,450	APR14	FEB15
	FEB	\$227,500	35,000	14,450	APR14	FEB15
	JAN	\$227,500	35,000	14,450	APR14	FEB15
	ALL	\$227,500	35,000	14,450	APR14	FEB15
	DEC	\$227,500	35,000	14,450	APR14	FEB15
	NOV	\$227,500	35,000	14,450	APR14	FEB15
	OCT	\$227,500	35,000	14,450	APR14	FEB15
	SEP	\$227,500	35,000	14,450	APR14	FEB15
	AUG	\$227,500	35,000	14,450	APR14	FEB15
	JUL	\$227,500	35,000	14,450	APR14	FEB15
	JUN	\$227,500	35,000	14,450	APR14	FEB15
	MAY	\$227,500	35,000	14,450	APR14	FEB15
2014	APR	\$227,500	35,000	14,450	APR14	FEB15
	MAR	\$227,500	35,000	14,450	APR14	FEB15
	FEB	\$227,500	35,000	14,450	APR14	FEB15
	JAN	\$211,300	50,000	22,500	APR14	JUN14
	ALL	\$211,300	50,000	22,500	APR14	JUN14
	DEC	\$211,300	50,000	22,500	APR14	JUN14
	NOV	\$211,300	50,000	22,500	APR14	JUN14
	OCT	\$211,300	50,000	22,500	APR14	JUN14
	SEP	\$211,300	50,000	22,500	APR14	JUN14
	AUG	\$211,300	50,000	22,500	APR14	JUN14
	JUL	\$211,300	50,000	22,500	APR14	JUN14
	JUN	\$211,300	50,000	22,500	APR14	JUN14
	MAY	\$196,300	55,000	25,600	MAY13	APR14
	APR	\$196,300	55,000	25,600	MAY13	APR14
	MAR	\$186,300	55,000	26,250	APR13	AUG13
	FEB	\$186,300	55,000	26,250	APR13	AUG13
	JAN	\$186,300	55,000	26,250	APR13	AUG13



Rick Berns
Box 44
Old Harbor

12/18/19

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

RE: Proposals 63, 64, 65, 66

Dear Chairman Morisky and Board of Fish members:

My name is Rick Berns, and I am a salmon seine fisherman based out of the community of Old Harbor on the East side of Kodiak island. I have been fishing since 1972 as a crewman and started running a boat in 1976. I have been the mayor of Old Harbor since 1990, and fishing is the economic backbone of our community. The salmon fishery has been the major contributor economically to the residents of our community, and the main employment provider and these proposals pose an economic threat to not only our community but to our neighboring villages as well.

These proposals create an issue of fish quality. If you prevent Kodiak fisherman from having the ability to harvest high quality local fish on the capes, you create an issue of harvesting fish, especially pinks and chums in inner bays where the quality of fish starts to deteriorate. You also increase gear conflicts between seine and setnet as you cram everyone up into the bays. The incidental harvest of Cook Inlet sockeye is part of the longstanding history of fishing patterns in Kodiak, and is part of a natural allocation built into the fishery. This allocation has been solidified for more than 30 years under the North Shelikof Sockeye management plan. The amount of sockeye harvested in the Shelikof is related to the run size of all sockeye producing streams, but is managed specifically for the harvest of local stocks of sockeye, chum and pink salmon. These proposals are nothing more than an attempt by Cook Inlet fisherman of sensationalizing an already known, documented, and managed allocation in the Kodiak salmon fishery.

I respectfully request you reject these proposals and leave the Kodiak management plan alone, as it is a proven working management plan having undergone repeated scrutiny by past boards and found to be solid.

Respectfully,

Rick Berns



Rick Berns
Box 44
Old Harbor
99643

12/18/19
Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 58, 59, 60, 61, 62

Dear Chairman Morisky and Board of Fish members:

My name is Rick Berns, and I am a salmon seine fisherman based out of the community of Old Harbor on the East side of Kodiak island. Fishing since 1972 as a crewman and started running a boat in 1976. I have been the mayor of Old Harbor since 1990, and fishing is the economic backbone of our community. The salmon fishery has been the major contributor economically to the residents of our community, and the main employment provider and these proposals pose an economic threat to not only our community but to our neighboring villages as well.

With regard to the Cape Igvak fishery, I would to see Status Quo. This management plan was founded based on the historical fishing patterns of Kodiak fishermen. It was not created as an economic pillow for Kodiak fishermen as Kodiak stocks were depressed, but rather as a recognition that Chignik origin sockeye have comprised a component of harvest to Kodiak fisherman since before limited entry.

The Cape Igvak fishery eases pressure on the South end of Kodiak by providing more area available to the entire fleet. Traditionally, Old Harbor fisherman fished the Alitak, and Southwest Kodiak districts during June and early July, and the Igvak fishery creates opportunity for boats from Kodiak and Homer to fish in areas other than those fished by Old Harbor fishermen. As a result of poor Chignik runs in the last few years, and the lack of fishing opportunities in the Cape Igvak section, we have noticed an increase in the number of boats now fishing areas traditionally fished mostly by Old Harbor and south end fishermen.

While we recognize the poor runs to the Chignik system have placed an economic hardship on the Chignik fishermen, we would like to remind the Board that those poor runs were caused by environmental conditions, not by pressure on stocks from Kodiak fishermen. The safeguards within the Cape Igvak management plan prevent Kodiak fisherman from placing biological strain on the Chignik systems. I respectfully request the Board **reject** these proposal as the economic balance of our communities are also tied to the strength of our salmon fishery.

Sincerely,

Rick Berns



Robbie Boskofsky
Box 1
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Vote NO Proposals 37, 58,59,60,61,62,63,64,65,66

Board Chairman Morisky and Board Members:

I am the president of the Native Village of Ouzinkie. My family and I choose to live in Ouzinkie. I have commercial fished with a number of Ouzinkie fishermen. Fishing is the economic base of Ouzinkie. I'm concerned that these proposals from Chignik and Cook Inlet will hurt our fishermen and our community. I'm just worried about keeping Ouzinkie together. We're down to 16 kids in the school this year. It will only take a couple more families leaving and we'll be Larsen Bay and Karluk with their schools closed. I know it may seem to you that one little regulation change here or there won't make that much difference. However, these things have a domino effect. You close Cape Igvak and then those boats, every year, are competing with our local guys in Marmot Bay.

One of the things I don't understand is why the Alaska Board of Fisheries is looking to solve Cook Inlet problems here in Kodiak. Cook Inlet doesn't have escapement problems. As I understand it, the Kenai River often hits the upper end of their escapement goal and beyond. Then I hear the problem is in the Susitna drainage. But this also doesn't make any sense either. Why would the Board look to Kodiak to solve issues in the Susitna when the problem is right there with the drift fleet in the middle of Cook Inlet? Upper Cook Inlet management problems have to start with regulating the largest and closest interceptor, not the smallest and furthest away.

From what I can see I don't see how the Board could favor Cook Inlet with an additional salmon allocation from the Kodiak area. Where is the new and expanding fishery? I read in the Cook Inlet proposals the assertion that the Kodiak seine fleet, sometime (the proposer is vague) has changed its fishing patterns. The skippers I talk to in Ouzinkie would dispute this. They have fished the capes along the Shelikof strait, on both sides, as far back as the 1950s. In fact, they believe the North Shelikof plan was a big take away from where they use to fish. It was the Ouzinkie fishermen that came back to the Board with historical evidence regarding the S.W. Afognak section of the N. Shelikof plan and persuaded the Board to modify the plan and give



them a ½ mile out to fish. So, when you look at it, there is no new or expanding fishery here on Kodiak that would justify making the changes Cook Inlet is proposing. Again, I'm asking you to just vote NO on proposals 37, 58, 59,60, 61,62, 63,64,65 and 66.

Very Truly yours,

Robbie Boskofsky



Robert W. Katelnikoff
Box 56
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Oppose Proposals 58,59,60,61,62,63,64,37.65.66

Board Members:

I'm a salmon fisherman living in Ouzinkie. I'm been involved with the Tribal Village of Ouzinkie and worked hard over the years to keep our community alive. Salmon fishing is very important to Ouzinkie. I'm currently skipper on a salmon vessel. I travel all around the island to fish. It concerns me that the Board would consider eliminating the Cape Igvak fishery or further limiting Kodiak because of Cook Inlet Concerns. Both of these proposals will hurt me, my crew and the community of Ouzinkie.

The Cook Inlet sponsored proposals for Kodiak are a sham – especially proposal #66 from UCIDA. It is a fish grab, pure and simple. Why does UCIDA need to resurrect something that happened more than 30 years ago by a few Kodiak boats to justify its proposal? Kodiak has been managed on Kodiak stocks since 1989, thirty seasons ago. There are no new interceptions, only the memory of an old one. Catches of Cook Inlet fish in Kodiak today are incidental and happen because it is unavoidable in Kodiak's focus on quality pink salmon fisheries. The incidental take of Cook Inlet bound fish is historical, more than a hundred years duration, and is a natural part of the Kodiak's mixed stock fishery. The trade off to further allocate to Cook Inlet is just not worth it.

I see there are also a couple of Chinook proposals in the packet. I know that we are required to discard the larger Chinook we catch. I'm concerned about proposal 37 and some sort of universal Chinook management plan. I don't think this will work. Ouzinkie had worked hard to limit the trawl bycatch of Chinook. There are too many variables regarding Chinook to put together a comprehensive management plan --- unless it takes in both State and Federal waters.

Again, please help us keep a salmon fishing fleet in Ouzinkie and vote NO on proposals 37, 58,59,60,61,62,63,64,65 and 66.

Very truly yours,

Robert W. Katelnikoff



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Written testimony
Date: Tuesday, December 3, 2019 3:36:55 PM
Attachments: [Carmon HB139 HSTA 04252019.pdf](#)
[Carmon X X 04252019.docx](#)

Begin forwarded message:

From: LIO Kenai <lio.kenai@akleg.gov>
Date: Apr 30, 2019 at 2:16 PM
To: Roni Carmon <dallasak789@hotmail.com>
Subject: Written testimony

Good afternoon Mr. Carmon.

Attached are the edited versions of the testimony you dropped off for HB 139. If we don't hear of any changes you would like to make by 2:30 pm this afternoon, I will submit the one for HB 139 to the committee.

For the second one, there was no bill or resolution written on the paper. Which piece of legislation did you intend for it to accompany?

If you have any questions, please let us know.

[Heather Prisk](#)
[Kenai LIO](#)
[283-2030](#)



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Complete List Of U.S. Organizations Funded By George Soros - Young Conservatives
Date: Tuesday, December 3, 2019 3:35:20 PM

This is a interesting read:
You need to look at number ,58,and number 66

Your being funded by George soaros ,to eliminate ,Commerical fisherman industry.
This is fish and game using the board of fish ,to eliminate the Cook Inlet Commerical fishery.

Begin forwarded message:

From: Dallasak789 <dallasak789@hotmail.com>
Date: Nov 17, 2019 at 7:43 AM
To: Bbird <bbird@radiokenai.com>
Subject: Complete List Of U.S. Organizations Funded By George Soros - Young Conservatives

Tap on the blue to open

https://www.chicksonright.com/youngconservatives/2019/11/16/complete-list-of-u-s-organizations-funded-by-george-soros/?utm_source=palin&fbclid=IwAR0rdGY7blkYDFuuQ--TxGONDsvo50IurS3dqGlmlPXmitflB3l5ubd4gU



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending
Date: Tuesday, December 3, 2019 3:16:51 PM

Begin forwarded message:

From: Matt Gruening <matt.gruening@akleg.gov>
Date: Oct 2, 2019 at 5:40 PM
To: Roni Carmon <dallasak789@hotmail.com>
Subject: RE: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

Hey Roni,

I believe I said messages below. I was between meetings, listened to your voicemail, and wanted confirming that I received them as you requested.

Thanks again for the information. I will take a deeper look into this stuff when I get a chance.

Sincerely,

Matt Gruening
Chief of Staff
Fisheries Committee Aide
Office of Rep. Louise Stutes
Work: 907-465-3271
Cell: 907-209-0280

From: Roni Carmon <dallasak789@hotmail.com>
Sent: Wednesday, October 02, 2019 3:25 PM
To: Matt Gruening <Matt.Gruening@akleg.gov>
Subject: Re: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

I sent 4messages not one.

On Oct 2, 2019 at 1:55 PM, <[Matt.Gruening](mailto:Matt.Gruening@akleg.gov)> wrote:

Hey Roni

Confirming that I received your messages. I am in meetings this afternoon sorry.



Thanks for the info.

Sincerely,

Matt

From: Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>
Sent: Wednesday, October 02, 2019 1:54 PM
To: Matt Gruening <Matt.Gruening@akleg.gov>
Subject: FW: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

From: Roni Carmon <dallasak789@hotmail.com>
Sent: Wednesday, October 02, 2019 12:27 PM
To: Rep. Louise Stutes <Rep.Louise.Stutes@akleg.gov>
Subject: Fwd: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

This is just stupid/I'm not.
Only in office a week ,and he comes up with this .

If we had a commission of revenue,in stead a commission of fish?
Would he'd been as stupid?
To let 44billion dollars go through his fingers.

Begin forwarded message:

From: Dallasak789 <dallasak789@hotmail.com>
Date: Sep 1, 2019 at 8:53 PM
To: Roni Carmon <dallasak789@hotmail.com>
Subject: Alaska Journal | ADFG leaders tout \$11 billion return on agency spending

<https://www.alaskajournal.com/2019-04-03/adfg-leaders-tout-11-billion-return-agency-spending>



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: This letter :I hope you make law!
Date: Tuesday, December 3, 2019 3:14:14 PM

I hope you think about ,what's coming.
The loss of the second biggest fishery, will soon be gone

Begin forwarded message:

From: Ombudsman General e-mail Account <ombudsmangeneral.e-mailaccount@akleg.gov>
Date: Oct 30, 2019 at 3:34 PM
To: Roni Carmon <dallasak789@hotmail.com>
Subject: RE: This letter :I hope you make law!

Good afternoon, Mr. Carmon,

The Alaska State Ombudsman investigates complaints about the administrative acts of state government agencies. If you have a complaint about the administrative act of a state agency and you have not been able to resolve your issues directly with the agency, you can file a complaint with our office.

You can fill out a complaint form that you can find [here](#). You can submit it via mail, email or fax. Our contact information is:

Alaska State Ombudsman
1500 W. Benson Blvd.
Anchorage, AK 99503
Phone: 907-269-5290
Fax: 907-269-5291
Email: ombudsman@akleg.gov

You can also make a confidential complaint through our online complaint portal [here](#).

-

If you have questions about the jurisdiction of our office or about the ombudsman complaint process, please contact our office directly at (907) 269-5290 or toll-free (outside of Anchorage, but within Alaska) at 1-800-478-2624.

Sincerely,

Marie Laroza
Intake Assistant
Alaska State Ombudsman

From: Roni Carmon <dallasak789@hotmail.com>



Sent: Monday, October 28, 2019 1:02 PM

To: Ombudsman General e-mail Account <OmbudsmanGeneral.e-mailAccount@akleg.gov>

Subject: Fwd: This letter :I hope you make law!

Can I submit this letter ,with out a lawyer?

Begin forwarded message:

From: Dallasak789 <dallasak789@hotmail.com>

Date: Oct 24, 2019 at 3:45 PM

To: Rep. Sarah Vance <rep.sarah.vance@akleg.gov>, Rep Stutes <rep.louise.stutes@akleg.gov>

Subject: This letter :I hope you make law!

The illegal ,act of adfg,and all he bof!

The state congress didn't intend,

The adfg ,and the bof to do this too ,the Commerical fisherman.

It was adfg,that started the dipnet fishery,it was a emergency order,back in 1989



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Bof
Date: Tuesday, December 3, 2019 12:17:00 PM

Sending again
Maybe some one will read it.

Begin forwarded message:

From: Glenn E (DFG) Haight <glenn.haight@alaska.gov>
Date: Sep 30, 2019 at 4:23 PM
To: Roni Carmon <dallasak789@hotmail.com>
Subject: RE: Bof

Hi Roni,

There is an automatic response on our end when that email address is used, but it will only send the automatic response on the first email. After that it recognizes the sending email address and won't keep sending the note.

That address below looks correct. I recall last time we messaged each other I checked and we had received many emails from you.

I think we are receiving them.

Thanks,
Glenn

From: Roni Carmon <dallasak789@hotmail.com>
Sent: Monday, September 30, 2019 2:11 PM
To: Haight, Glenn E (DFG) <glenn.haight@alaska.gov>
Subject: Fwd: Bof

I've sent ,more board of fish
Messages, they used to say delivered.
I'm not getting that message any more.
So I'm not sure there going any where .
Roni lee Carmon

Begin forwarded message:



From: Dallasak789 <dallasak789@hotmail.com>
Date: Sep 30, 2019 at 2:07 PM
To: Dfg Comments <dfg.bof.comments@alaska.gov>
Subject: Bof

Talked to Doug Lang,
Commission of fish!

He told me the dipnet fishery was implemented, and thought of
Way before the oil spill.

If it was; then it was set up to harvest fish ,through the state.

And the state was selling Commerical fishing permits,
Knowing some day , they would be taking the harvest away from Commerical fishermen.
In cookinlet.

In 1989 ,the oil spill,the dipnet fishery was implemented.
30 years now,

And the Commerical fisherman ,their industry ruined.
Last year ,the dipnet fisherman took 7million fish,
The sport fisherman took 6million just on the Kenai river.

Adfg allocations ,to Commerical fisherman was ,1.3 million fish.
So 14 million fish, we are talking about the Kenai river.

The dipnet fisherman got 21 days on the Kenai river ,and 41days on the kasiolf,

We got half those day.
The commission came down took two days away from us.

Said he wasn't going to follow the plan.
That gave the dipnet fishery,non stop 9 days straight of the peak.

We got zero days of the peak ,the week of the 23 of July.

The oil companies,paying fish and game wages.
The brutal government must stop this,or buy are permits back.
You realize how many sucisides
And how must financial losses you caused.
How many divorces,broken homes,you caused.

And zero income to the state ,or bourgh.
Last year 542 million dollars retail



Left the state,two suicides

Let's stop this massive give away.

It's not necessary ,limit fishing tried to go to 18, and even 24 fish .

With a fishing pole.

How stupid was that



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: I listen to the board of fish in Seward
Date: Monday, December 23, 2019 1:28:18 PM

I believe ,your going to. Rule ,their no cost to the public ,,or no hard ship on the Commerical fishery, and the commissioner ,can rule a emergency order.

The bof has the final say,

Dipnet fishery does no harm to the local economy,there for the dipnet fishery can continue on the Kenai peninsula.

But remember, if you read the story about George soaros,you can see ,your getting funding to keep Commerical fishermen on shore.

And 542 million was what was given away as free food to the people,rather than the general fund.

That's how I'm going to fight this.

People don't need substance,or personal use.

They want jobs ,and they want a future.

You can't buy votes ,with free food.

They can go to the food bank for that!



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Commerical fishing
Date: Wednesday, December 25, 2019 1:11:55 PM

Begin forwarded message:

From: Dallasak789 <dallasak789@hotmail.com>
Date: Dec 5, 2019 at 11:08 AM
To: Ethanford <ethanford@alaska.gov>
Subject: Commerical fishing

Ethan I can't be there:but we need to stop the dipnet fishery,
We need to stop catch and release on all rivers and lakes in Alaska.

We need to stop proxy fishing for king salmon.
Commerical can't fish reds,cause of low king returns:at he same time ,guides,and seniors 65
and over fish kings year round.

Proxy cards for seniors , they never stop fishing kings ,with proxy cards.

The two rivers,on the Kenai Penninsula,Kenai River ,and kasiolf River , take 543 million
dollars worth of salmon .

At 15.99 a pound.

That not subsistence fishing .

It a total harvest , taken from the Commerical fishery.

It needs to stop. Today things have changed,the oil companies are selling their assets,
Adfg ,the biggest user of federal funds in Alaska.

And they re funding going to run out.

So the Commerical fishery about the only income to the state .

That's legally taken :

So maybe it's time to stop the ,catch and release,and the taking of fish by the dipnet fishery.

And concentrate on a good Commerical fishery again

Ron Carmon



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: No more substance,or personal use.
Date: Friday, December 27, 2019 5:38:26 PM

Till guides get licensed,
They fish for free.

They cater to the substance,and personal use,and bribe ,politicians,for a wavier,and fish
Commerically , and pay nothing to the state or borough,or federal governments.

Currently the guides ,and charter boats operators owe the state of Alaska,and the federal
government, 44 billion dollars,
This includes the dipnet personal use,on the Kenai peninsula.



From: [Dallasak789](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Sockeye salmon ,pollack, are plankton eaters
Date: Friday, December 27, 2019 6:20:05 PM

Sockeye help ,establish the ocean ph levels, in our ocean .

We got to save these fish!

When we target sockeye salmon

They should be taken in the ocean only, we can no longer take the plankton eater in the hold up area,in river or in there spawning grounds.

We need every egg ,we can get to come back to the river as a fish.

The rivers and lakes should be a sanctuary , not a place of the blood sport of catch and release.

And derbies ,and personal use of want and waste.

Never have we seen such stupidity ,as the last twenty years on the Kenai peninsula borough.

Over 13 million fish in jeopardy ,for some 30 years now.

And almost zero dollars collected ,for revenue .

Our state broke now!

Proof of broke ,the politician are after the permanent fund.

Our fish will be our income .

Just as it always has been.

So we need to stop , personal use.

Is it a theat to our environment (yes)

Is it a threat to our economy (yes)

Is it un regulated(yes)

Is un enforcers ()yes)

Is it a threat to our planet (yes)

Will it hurt any one not to have personal use,(no)

The majority of the people ,think personal use ,is not a good thing.

And we need jobs ,more than we need personal use.

Roni carmon



From: [Ross Kendall](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Kendall. comments
Date: Friday, December 27, 2019 9:41:42 AM

Sent from my iPad

Begin forwarded message:

> Dear. Board Member

>

> As a setnetter on the west side of Kodiak Island since 1979 I would like to address a few of the proposals before you.

>

> Proposal # 67. Allow the use of single filament web.

>

> The slime we are getting on our nets is getting worse by the year. Using single filament web will allow us to fish a little longer into a slime event. Already we are using 4500 psi pressure washers and 2" volume pumps trying to keep the nets clean. Please note that this change will not affect any other fishery or area. The use of monofilament web will allow our nets to stay clean a little longer.

>

> Proposal #70. Karluk Pink Proposal. Like the Karluk Reds, the Karluk Pinks come by our nets on their way to the Karluk. They should definitely be part of the management plan after the 6th of July. When they build up in the Karluk lagoon the west side should remain open and not close because Bowman Creek or some small west side pink run looks like it might be short a few pinks.

>

>

> Proposal # 71. Westside Inner Bay Proposal. We should definitely keep Seiners out of the inner bays until interim escapement has occurred.

> I believe that over the years there is a problem with the management plan that has contributed to the falling early pink returns on the west side. When the projection is for fewer pinks F&G managers limit the early July openings to 3 days a week or even two days. The problem comes when they re-open after the fish have gone into the inner bays for 4 days. The seiners, because they are allowed to, head into the inner bays and spend a day or two cleaning out whatever build up has taken place. Two years from now a 3.5 day opening has become a 2.5 day opening followed by 4.5 day closing. If we would keep seiners out of the inner bays on the West side until late in July I believe the early July pinks would return and we could all fish on them. In 1979 and the eighties the first 1000 pink day for a setnetter on the West side of Kodiak came in the first or second week of July and the openings starting on July 6th were 4 or 5 days long. That situation should be the goal going forward.

>

>

> Finally Cook Inlet Proposals 37, 52 to 56. If the Northeast wind is blowing the Cook Inlet reds don't show up on the west side of Shelikof Straits. The west side seiners have had restrictions on their fishery for years. Every four or five years with the right westerly some one near the capes gets a few. So we are going to restrict fishers along the westside of Kodiak Island every year on the off chance the wind is blowing westerly at the wrong time. Perhaps Cook Inlet Commercial fishers should restrict dip netters in the Kenai river and restrict tourists in campers who pay for their drive to Alaska by canning their catch and selling it back home in Nebraska. With the resulting additional escapement they could increase their run. Or they can pray for east winds on Shelikof Straits in early July.

>

>

>

> Virginia: Above is my comment Ross



Sally Rittenhouse
PO Box KWP
Kodiak, AK 99615

December 26, 2019

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Proposals 37, 58-66, and 70-77

Dear Chairman Morisky and Board of Fish members:

My name is Sally Rittenhouse. I am a third generation fisherman and I have spent my entire life dedicating myself to the fishing industry in Kodiak from gillnetting, longlining, pot fishing, jigging, and, most importantly for me, seining. Very recently, I purchased my own boat so I could participate in the seining fishery. It is difficult for young people like myself to enter into this industry with a workable boat, permit, and adequate gear. When we do manage, we are at odds with environmental factors that have made our Kodiak salmon runs unpredictable; in addition to this, outside influences threaten to negatively impact the foundation of Kodiak's management plan and create yet one more lofty barrier to surmount. I became heavily invested in the salmon fishery in Kodiak--following family tradition--because of this solid Kodiak management plan that has existed my entire life. With the growing bombardment from different areas attempting to change the longstanding Kodiak management that has proven itself many times over to be reliable and accountable, young fishermen like myself could eventually find ourselves invested in a fishery that no longer produces a reliable livelihood. It is for these reasons that I respectfully request the Board to reject Proposals 37, 58-66, and 70-77.

The Kodiak salmon management plan is designed to account for nonlocal salmon traveling through Kodiak waters. It is a tried and true system with a longstanding history that has proven to work. Our management plan already contains adequate and solid safeguards against targeted interception of sockeye salmon traveling to origins outside of Kodiak. Placing further restrictions and limits on Kodiak fishermen is unfair and unnecessary. My family lives in a small community off-grid where we rely heavily on our salmon fishery not only for subsistence but also as our livelihood. Our reliance on our salmon industry has made it possible for us to maintain our lifestyle. To have restrictions and limits placed on the salmon fishery would impact us in more ways than just financially. It could cause us to lose what we have worked our entire lives for. These proposals, should they pass, would greatly reduce our productivity and our ability to continue living as we have lived for three generations.

Many of these proposals are just an attempt of other fishing groups to blame Kodiak fishermen for their



failing salmon returns. May it be reminded that salmon runs are cyclical, experiencing highs and lows. Kodiak has experienced low returns much the same as Chignik and Cook Inlet have. Changing the construction of our complex management plan is not going to fix environmental factors outside of our control. Again, I respectfully urge you to reject proposals 37, 58-66, and 70-77. I appreciate the opportunity to comment.

I hope the Board continues to apply consistency in its application of the guiding policies such as the Mixed Stock Fisheries Policy, and the Sustainable Fisheries Policy.

Sincerely,

Sally Rittenhouse



RE: Comment on multiple proposals

It is my understanding that certain agencies have certain authority to make decisions. These agencies use public comment as a way to make informed and logical decisions. In this case additional information came from science which alluded to information that may not be accurate because the information is subject to variables that are not reliably consistent. Information gathered through the use of these variables has more reliability for the propensity to change than for consistency. Therefore changing a set of rules and regulations with the knowledge that the variables fluctuate may result in unforeseen catastrophe detrimental to the Kodiak Island fisheries. It is the people's understanding the agencies have authority to make changes using current information but we also realize the agency does not possess the autonomy to make changes without public comment. In this situation the needs of one group does not out way the needs of the other . No changes are necessary. No changes are justifiable. Too many variables are not consistent or stable. Think of the people and consider the negative affect to the island fishing industry. Our economy is derived mainly from the fishing industry. Our borough, city's and tribal governments will be affected which in turn will affect every citizen. The changes proposed will change the fabric of the native culture. The federal and state government and their agencies have a duty to protect the longevity of the little that remains to our culture and way of native life. Consider the choices for change wisely. At this point in time the best decision is to make no changes to current rules and regulations. Thank you for reading everyone's concerns. Best Regards, Sandra M Katelnikoff Lester



RE: Comment on multiple proposals

RE: Proposals #37, 58-66, 70-77 Dear Chairman Reed Morisky and Board of Fish Members: I am a 55 year old second generation commercial fishermen who has fished Kodiak for 40 years. I've been running my own fishing vessel for the past 30 years, participating in multiple fisheries but namely, salmon seining. My husband and two daughters are deeply invested in the salmon fishery here, as well as many of our friends and relatives. The changes to Kodiak's management plan that many of these proposals ask for are unnecessary, as many of them are false accusations lacking in evidence. Kodiak's salmon fishery has always been well-managed and has been considerate of not just the locals who fish here, but also towards other areas such as Chignik and Cook Inlet. It is not Kodiak's fault that these areas are experiencing low salmon returns. Kodiak has had more than its fair share of low returns that we all have managed to suffer through. Trying to change our management plan is not going to fix what is just a known fact: That salmon returns are cyclical in nature. I have seen a lot of highs and lows in all fisheries during my career, yet managed to survive without trying to cause irreversible harm to or blame some other fishing group. We all want to make it and continue doing what defines us. I would like to see the Kodiak salmon fishery remain accessible not only to folks like myself, but to our future generations, like my daughters. These proposals would cause great harm to the current and future livelihoods of countless Kodiak fishermen dependent on the salmon industry. I respectfully ask that the Board please oppose Proposals #37, 58-66, and 70-77. Thank you for allowing me to comment. I hope the Board continues to apply consistency in its application of the guiding policies such as the Mixed Stock Fisheries Policy and the Sustainable Fisheries Policy. Sincerely, Shawna Rittenhouse



RE: Comment on multiple proposals

RE: Proposals #37, 58-66, 70-77 Dear Chairman Reed Morisky and Board of Fish Members: I am a 62 year old second generation commercial fishermen who has fished Kodiak for 40 years. I own a setnet site on the west side of the island in Uganik Bay, which is where my family's home is also located. My wife Shawna has been running a salmon seiner for nearly 30 years. My two daughters, Sally and Michelle, have each been fishing for about 20 years, and are trying to follow in their mother's footsteps by recently buying into their own seine operations. I would especially like to see my daughters succeed in their business ventures, but I am concerned that, should these proposals pass, it is going to greatly harm their ability to do so. Not to mention threaten mine, my wife's, and many other fishing friends and relatives who are dependent on the salmon season as their primary source of income. Considering that fishing is unstable enough due to environmental factors and the usual highs and lows of salmon runs, the last thing we need are unnecessary obstacles adding to the mix. The changes to Kodiak's management plan that many of these proposals ask for are unnecessary, as many of them are false accusations lacking in evidence. Kodiak's salmon fishery has always been well-managed and has been considerate of not just the locals who fish here, but also towards other areas such as Chignik and Cook Inlet. It is not the Kodiak fishermen's fault that these areas are experiencing low salmon returns. Kodiak has had more than its fair share of low returns that we all have managed to suffer through. Trying to change our management plan is not going to fix what is just a known fact: That salmon returns are cyclical in nature. I have seen a lot of highs and lows in all fisheries during my career, yet managed to survive without trying to cause irreversible harm to or blame some other fishing group. We all want to make it and continue doing what defines us. I would like to see the Kodiak salmon fishery remain accessible not only to folks like myself, but to our future generations, like my daughters. These proposals would cause great harm to the current and future livelihoods of countless Kodiak fishermen dependent on the salmon industry. I respectfully ask that the Board please oppose Proposals #37, 58-66, and 70-77. Thank you for allowing me to comment. I hope the Board continues to apply consistency in its application of the guiding policies such as the Mixed Stock Fisheries Policy and the Sustainable Fisheries Policy. Sincerely, Steve Rittenhouse

Stephen Shangin
8840 Washburn St.
Anchorage, AK 99502



PC583
1 of 1

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

November 24, 2019



Subject: Cape Igvak Fishery on Chignik Sockeye Salmon

Dear Chairman and Members of the Alaska Board of Fisheries,

There are five proposals coming before at your Kodiak meeting that address Igvak. As a Chignik fisherman I am in full agreement with two: Proposals 60 and 61.

Unfortunately I am unable to attend the Kodiak meeting, not from lack of desire or interest but because I simply cannot afford the cost of air travel, meals, and a hotel room. My family is broke from the poor salmon fisheries that Chignik has experienced in recent time. My debts are significant, and while last season I caught about ½ of what I usually catch the main problem is that I have never experienced such a season as in 2018 when our fishery only caught 128 sockeye (I did not catch a single one of them!). Being closed for the entire 2018 season put me and others in debt. It is going to take several average and good seasons to recover, and unfortunately Chignik is not likely to see any semblance of a good sockeye fishery or even an average one this next season based on the forecast. We may very well have no fishing time on our first run in June and July as was the case last season, so I have been told.

Chignik salmon fishermen need significant relief from the neighboring interception fisheries not just as currently provided in the SEDM and Igvak management plans but when the Chignik runs (hopefully) become what they use to be, reasonably strong and stable. Those other areas have plenty of fishing opportunity, and we do not as we are tied totally to local stock management by regulation. When one or both Chignik runs are short on escapement we do not fish. If like Kodiak we had multiple sockeye runs (30+) and hatchery fish we would not have the problem that we now have. Hopefully you understand that the prospect of the entire Chignik fleet being tied to the dock for most, if not all the season, when our early and late runs fail, is real.

Please support the proposed increase to the Chignik harvest preference (Proposal 61) and the allocation change to 5% (Proposal 60).

Thank you, 

Steven Horn
1210 Mission Road
Kodiak, AK 99615



PC584
1 of 1

12/26/2019

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

RE: Proposals 37, 58-66, 70-76

My name is Steven Horn. I have been an owner/operator in the Kodiak seine fishery for the past 47 years and a crew member for 7 years prior to that. You might say I have some history in the fishery. I've been to more Board of Fishery meetings than I care to count and it is always to defend the Kodiak fishery.

I respectfully request you reject proposals 37, 58-66, and 70-76. They are all merely rewritten and reworded proposals that have been before us in some form or another using the strategy of death by a thousand cuts. We have the Igvak Management Plan, North Shelikof Management Plan as well as ones for all other Kodiak areas, which over time have been critiqued and tweaked to become solid utilized management tools. Yet every 3 years when Kodiak area comes up in the board cycle there are a bunch of proposals to further restrict our fishing time and area. The only thing that's different from previous Board meetings is new board members hearing the same old tune. What a huge waste of time and resources. At best we keep the status quo or we lose a little bit more. In my 50+ years of fishing Kodiak I've lost a lot.

I ask this board to take a hard look at where these proposals come from. Has Chignik ever addressed their intercept fishery of Kodiak bound fish or Area M bound fish, or how about Cook Inlet or Bristol Bay bound fish or are we to naively assume that the only fish entering the Chignik management area are Chignik fish. Where's their management plan? Where's their accountability? If you have any doubts, check out the geography.

How about Cook Inlet, let's talk about the ever increasing population of South Central Alaska with ever increasing sport fishing, dip netting, catch and release of King salmon ad nauseam.(What's the survival rate there?) Is every tourist owed a shot at our resources? I guess the answer is shut down all fisheries outside of Cook Inlet. What about trawler bycatch of Kings in the gulf. I could go on and on. I just don't fathom how the Kodiak fishery is always the bullseye.

Again I urge you to reject proposals 37, 58-66, and 70-76.

I know this letter will probably not even get read to the end if at all but to those of you who do I appreciate you taking the time and thank you.

Respectfully

Steven E. Horn



RE: PROPOSAL 77 Close waters within 500 yards of the terminus of the Ayakulik River to commercial salmon fishing September 1–October 31

Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 Re: Opposition to Proposals 73, 74, 75, and 77 Dear Chairman Morisky and Board of Fisheries Members, I am Steve Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Grace. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures. ? I oppose the following proposals (73, 74, 75, and 77) because I support the current management plan as written. Chinook are not a target species for commercial fishermen, there is already a non-retention policy for fish exceeding 28 inches I ask that the Board reject these proposals. Thank you for your time and consideration, Steve and Jenny Roth F/V Sea Grace Homer, AK



December 20, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Maintain Kodiak's Salmon Fishery, Oppose Proposals: 37, 58, 59, 60, 61, 62, 63, 64, 65, & 66

Dear Alaska Board of Fisheries:

Tangirnaq Native Village (aka Woody Island) is a federally-recognized Tribe whose Tribal lands are located within the Kodiak archipelago. Many of our Tribal members participate in Kodiak's salmon fishery, which is vital to the economy of the Kodiak area and the livelihood of many of its residents. Loss of salmon fishing opportunities will have a direct impact on Tangirnaq Native Village and its members.

The Kodiak salmon fishery has not expanded in a way which justifies any change to the Cape Igvak Management Plan, with fewer permits being fished now than a decade ago. Kodiak's management plans cover the entire archipelago and the mainland, and only allow fishing openings based on the presence of local stocks. Time, experience, and scientific studies have all shown that the incidence of Cook Inlet sockeye in Kodiak management area fisheries varies widely, and is inconsistent as to area and timing.

In the time that the Cape Igvak Management Plan has been in place, it has effectively managed this fishery. The Plan ensures both escapement into the Chignik system and an economic safety net for Chignik fishermen by limiting Kodiak. Under the Plan, Kodiak has averaged about 12% of the catch during years when fishing has occurred. The conservation aspects of the Cape Igvak Management Plan were highlighted with Chignik's recent run failures, as there was no fishing at Cape Igvak.

In summary, on behalf of Tangirnaq Native Village and the Woody Island Tribal Council, I request that the Board of Fisheries take no action on Proposals 37, 58, 59, 60, 61, 62, 63, 64, 65, & 66.

Sincerely,

Gwen Sargent, President
Tangirnaq Native Village



From: [Terri Springer](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Vote NO Cook Inlet proposals 37,, 58-66
Date: Thursday, December 26, 2019 4:44:50 PM

Dear Chairman and BOF members,

My 1st year setnet fishing on the Westside of Kodiak was 1968. As you can imagine there have been many changes in our fishing industry since then, both in management and regulations. But none that have been of greater concern than the Cook Inlet proposals 37, 58-66.

The umbrella concept and or 4 week blanket closures from June 25-July 28 where 65-69% of our total income is caught would be devastating to our family! Not only personally, but our community would be facing catastrophic economic disaster! From processors to cannery workers, and all Kodiak businesses would be severely negatively impacted by proposals that have such limited substance to a historical fishery other than "I want more"!

Closures will force the seine fleet into already congested areas, and with NO regulations for the co-existence of seine/setnet, we as setnetters will lose even more than we do now. Already at various times due to other area closures we are "shut down" by seiners setting on both sides of our gear and at times double setting! That is almost 2/3 of a mile blocking off all fish to our 150 fathom net. The result of a forced increase in the seine fleet to our area due to the proposed Cook Inlet closures will be the END of our livelihood.

Forced closures will devastate our local runs from overescapement and the quality will plummet. As seiners are the only one allowed into the inner bays, all Westside setnetters will lose.

This is a terrible precedent to set. Salmon are considered "common property" and do not "belong to" the management area where they were born.

By disrupting one areas fishery to give the advantage to another area will have statewide repercussions as other areas jump on the "THEY'RE MINE" bandwagon!

Kodiak fisheries is a historical fishery. We are not fishing in any new areas. The same species come and go year after year. But every year is different! The Westside sees very few Cook Inlet fish when the wind blows easterly. There is no way to determine what the weather and run will be year after year.

Thank you for your considerations.

SO4K setnetters

Tom & Terri Springer

Sent from my iPad



Travis Berns
PO Box 33
Old Harbor AK
99643

12/18/19

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 1 15526
Juneau, AK 99811-5526

RE: Proposals 63,64,65,66

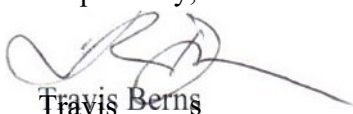
Dear Chairman Morisky and Board of Fish members:

I am a Kodiak salmon seiner based out of my hometown of Old Harbor. I started salmon fishing when I was 4 years old with my dad in 1980. I started officially crewing in 1990 when I was 14, and bought my own salmon seiner in 1999 during years when the price of reds was \$0.65 and humpies were \$0.05. My first years as a boat owner were difficult to make a living on salmon alone and I had to fish various other fisheries just to make it such as cod, and crewing in the Bering Sea. Over the past few years as a result of declining options in other fisheries, salmon has become my primary moneymaker. I request you **reject proposals 63, 64, 65, and 66.**

These proposals are unrealistic. The proposer is assuming that all we catch is sockeye bound for Cook Inlet. We have already switched over to pink and chum salmon management by the beginning of the timeframe suggested in this proposal. Growing up in Old Harbor, we have traditionally fished the Eastside during the early openers in July because often times these openers are shorter and it is hard to justify running to the other side of the island and increasing travel time and costs in doing so. In years past, harvest of sockeye returning to local systems such as Saltery, Olga, and Upper Station as well as early run pinks and chums on the Eastside have provided opportunity for Old Harbor fisherman to fish close to home and make money doing so. On years where these systems are weaker, we fish on the Westside of Kodiak and these proposals threaten the ability of these fisherman to fish in traditional fishing locations on local sockeye, pink and chum stocks.

The board needs to reject these proposals. The Kodiak salmon fishery is managed under a longstanding management plan that was created to manage local stocks. The incidental harvest of non-local stocks is minimal and what little we do catch is part of our historical harvest and historical allocation created when the BOF created the North Shelikof Sockeye Management plan in 1989. Please leave the Kodiak fishery as is, as the management plan is working just fine.

Respectfully,



Travis Berns



Travis Berns
PO Box 33
Old
Harbor, AK
99643

12/18/19

Chairman Reed Morisky
Alaska Board of Fisheries
Board Support Section
P.O. Box 1 15526
Juneau, AK 99811-5526

RE: Proposals 58,59,60,61

Dear Chairman Morisky and Board of Fish members:

I am a Kodiak salmon seiner based out of my hometown of Old Harbor. I started salmon fishing when I was 4 years old with my dad in 1980. I started officially crewing in 1990 when I was 14, and bought my own salmon seiner in 1999 during years when the price of reds was \$0.65 and humpies were \$0.05. My first years as a boat owner were difficult to make a living on salmon alone and I had to fish various other fisheries just to make it such as cod, and crewing in the Bering Sea. Over the past few years as a result of declining options in other fisheries, salmon has become my primary moneymaker. I suggest you reject proposals 58, 59,60, and 61.

The Cape Igvak fishery has been the best chance for me to make money in June. Not having the Igvak fishery in June has significantly impacted my decision of where to fish, and it is hard to justify even fishing without that increased chance of making money. I am one of the few fishermen from Old Harbor that fish Igvak when it is open, and without it, the pressure on south end stocks is increased. This also makes it harder for management to give us adequate time to gain any economic value from scratchy June fishing.

The Board needs to leave the Cape Igvak fishery as is. This part of the Kodiak salmon fishery is historic and was created to give Kodiak fisherman access to the traditional fishing grounds on the mainland district. With the safeguards in the management plan, we don't fish in Igvak unless Chignik is already fishing, so situations like the run failure in 2018 did not happen because of Kodiak fisherman catching Chignik fish. Leave the Cape Igvak fishery as is.

Respectfully,

Travis Berns



Vickie Novak
Box 61
Ouzinkie, AK 99644

December 23, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Ak 99811

RE: Vote NO Proposals 37, 58,59,60,61,62,63,64,65,66

Board Chairman Morisky and Board Members:

I live in the community of Ouzinkie and I've served on the Ouzinkie Native Corporation Board of Directors in the past. I've been married to Ouzinkie commercial salmon fishermen and now work for the Corporation as the Shareholder Development Manager. I interface with Ouzinkie residents to assess needs for the Corporation. For a long time, we've identified the need to strengthen the Ouzinkie fisheries economy as an overarching Ouzinkie need. These proposals from Chignik and Cook Inlet just go in the other direction. Rather than strengthening our rural fisheries-based economy they only take more away. Here in Ouzinkie we've lost our crab fishery, our herring fishery, our halibut fishery, most of our limited entry permits and now we keep having to defend the only fishery we have left – our salmon fishery.

The Board's mixed stock salmon fisheries policy provides that the Board's preference in assigning conservation burdens in mixed stock fisheries is through management plans set out in area regulations. Long-standing management plans are presumed to incorporate conservation burden and harvest allocation. It follows, then, that Kodiak's multiple management plans indicate that allocation and conservation apportionments are long-accomplished, with several prior boards affirming their equity.

If changes are considered for these long-standing stable fisheries, significant new information must be provided to justify upsetting the stability, or the changes will appear arbitrary which would compromise the Board's reputation as a fair and impartial regulator. Kodiak's stable and durable salmon fishery management plans have withstood an onslaught of proposed changes from both Cook Inlet and Chignik over the past 30 to 40 years. All of Kodiak's commercial salmon fisheries are covered by management plans focused on local stocks and have been for several years. There are no areas not covered by a plan.

Extensive proposed changes to Kodiak salmon management, therefore, must be well justified to overcome the current allocative stability cemented over a long time by past boards. To change



these plans just for the sake of change would invite twisting, perverting, or ignoring the allocation criteria in order for this board, in contrast to all prior Boards, to get a different allocative result.

More specifically, the Cape Igvak proposals, # 58-62, are all 100% allocative in nature. The proposers do not even attempt to provide credible new information to justify dramatically changing the long-standing Cape Igvak management plan. The Cook Inlet proposals, especially proposal 66, suffer similar deficiencies. There is no new information regarding the magnitude of Cook Inlet stocks in the Kodiak Management area and no harvest rates set forth that would warrant upending the stability of Kodiak Island's seven management plans.


Speculation, scattergun cuts, and blind stabs are not credible reasons to upset a management plan, and are not hallmarks of the Board's fair and impartial process. In summary, the proposers have not met their burden of providing measurable evidence of new fishing patterns or new stocks of concern.

This all leads me back to the impacts of regulation changes on Ouzinkie. When Cape Igvak is closed, more vessels compete with our local vessels for limited hook hauling spots. This reduces local catches. If more area were to be closed to "protect" Cook Inlet stocks, then more vessels will crowd into the inside areas around Ouzinkie and where Ouzinkie vessels fish. Again, this will reduce local catches of salmon. Said differently, if you grant any one of the 10 proposals listed above (with the exception of the Igvak registration proposal #62) there will be a direct economic impact on Ouzinkie.

Finally, in closing, I want to Thank the Board for your creation of the Ouzinkie subsistence fishing area at your last meeting. This, as you will remember, is a fishery supported by the Kodiak Regional Aquaculture Association by imprinting sockeye salmon on the Ouzinkie harbor. You created an exclusive subsistence zone for when these fish return. In each of the last three seasons Ouzinkie residents and others have taken advantage of this fishery and enjoyed the benefits of the exclusive zone. We now have fish for the elders and smoked and jarred fish in abundance. As a community, we are appreciative of what you created last Board cycle.

Thank you for considering my concerns about proposals 37, 58,59,60,61,62,63,64,65, &66. Please help Ouzinkie and Kodiak's salmon fishermen buy voting NO on these proposals.

Sincerely yours,


Vickie Novak



RE: Comment on multiple proposals

My name is Virginia Adams. I have been a commercial fisherman on Kodiak Island since 1980. I have owned and operated a set net site on Uganik Island on the west side of Kodiak for 40 years with my husband and son and hired crew. It is with great dismay that I once again have to spend tremendous time, energy and capital on responding to the never ending attacks by Cook Inlet salmon fishermen on the complex and successful Kodiak Management Area salmon regulatory plans. I was a founding member of the Kodiak Salmon Work Group and dedicated the same precious time and resources to this battle in 1995. It was in the preparation for that Board of Fishery meeting in 1995 that we compiled volumes of data showing the incidental catch in the KMA of Cook Inlet bound salmon to NOT be of concern for reaching Cook Inlet escapement goals or affecting commercial harvest opportunities for Cook Inlet commercial or sport salmon fishermen. And yet 25 years later we find ourselves with the same locked horns, over the same issue, attempting again to completely rewrite and disrupt the KMA because of the known fact that Cook Inlet bound salmon swim through Kodiak Island waters and are incidentally harvested by Kodiak salmon fishermen. Those fish always have and always will be incidentally caught in Kodiak. There is nothing new in the past 25 years. There IS a genetic study, short but sweet if cherry picked by Cook Inlet fishermen, that shows Cook Inlet salmon harvest in Kodiak. No revelation there. Lets not mention the hundreds of thousands of pounds of Kodiak salmon harvested during this time period. But I am getting off track. My point is this constant attack on Kodiaks salmon management has to stop. There are reams and reams of paper showing the incidental catch of Cook Inlet bound salmon does not contribute to any issues with escapement concerns or harvest restrictions in Cook Inlet. This constant threat from Cook Inlet groups costs Kodiak salmon fishermen, and our ADF&G Dept, and our entire community, tremendous time, energy and money. There has to at some point, and I hope NOW, a definitive "enough is enough" on the same attack over and over again.



Wallace Fields
P.O. Box 8370
Kodiak, AK 99615

December 27, 2019

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811

Regarding Proposals 66,65, 64, 63 and 37.

Dear Alaska Board of Fisheries:

My family has commercially fished salmon in the Kodiak Area for the past 66 years. This past summer was my 58th season at our set gillnet site in Uyak Bay, on the West side of Kodiak Island. Our nets are in open water on the Shelikof Strait. Some of our sites have been fished continuously since 1929 and many since before Statehood.

Over the last 50 plus years I've observed lots of changes in our salmon fishery. However, some things haven't changed. First, set gillnetting for salmon is still hard physical work without much help in technology or hydraulics. Second, since 1975 the same amount of setnet permits, with the same amount of gear for each permit, has been allowed. And third, Cook Inlet origin sockeye in the Kodiak area are unpredictable. I've seen years when we caught a fair amount of Cook Inlet fish for a day or two and other fishermen, just across the bay, didn't catch any. In other years, no one in our area saw a noticeable increase in larger sockeye during July and then, in some years, other people in Uyak Bay seem to catch Cook Inlet bound fish and we don't. That's why I get frustrated when I read proposals like 65 and 66 that claim there is "new information" about Cook Inlet fish in the Kodiak area and more regulations are needed. UCIDA knows better!

Every three years when the Kodiak salmon fisheries are up for consideration by the board, a new round of accusatory proposals are hurled at Kodiak about catching sockeye salmon bound for Cook Inlet. Sometimes the firing squad consists of new participants unfamiliar with the histories of Kodiak and Cook Inlet fisheries. Sometimes it's old hands at the game who try again to convince a new board that Kodiak is now expanding the Kodiak fishery to intercept Cook Inlet fish.

This round, the advocates are pointing to the Shedd genetic sockeye ID study and claiming that the report is "new information". Actually, the report adds additional detail to what managers already know. Let's have a quick review: The Kodiak incidental harvest of Cook Inlet sockeye has been going on for more than a hundred years. The earliest tagging report is from 1928 (duplicated in 1929) by Rich and Morton. That was 92 years ago. Rich tagged 700 sockeye in



August from a trap in Uganik Bay. Most of the recoveries came from Kodiak fisheries, but two tags were recovered in Cook Inlet, despite no real recovery effort there.

In 1948 and 1949, Don Bevan tagged about 11,000 sockeye from traps in northwest Kodiak. Small numbers (28 and 13, respectively) were recovered in Cook Inlet, again without a targeted recovery effort.

Forty one separate sockeye salmon tagging efforts around Kodiak Island took place in the 1960's and 1970's by ADF&G. The recoveries, often small in number, showed a highly mixed composition of stocks from all parts of Kodiak Island, Cook Inlet and Chignik. Several stock composition findings by Barrett and Swanton for the years 1988-1992 in the North Shelikof district showed a large mixture of stocks with Cook Inlet stocks dominant some years.

More recently Shedd's genetic sockeye stocks ID study for 2014-16 showed with more precision which stocks are present in Kodiak. Nevertheless, when you add the numerous mixed stock analyses with the recent genetic stock identification studies, they all show that Cook Inlet origin stocks are present in the Kodiak seasonally at a wide range of magnitude. Think of it, the conclusions of the Shedd study with modern technology is essentially the same as all the tagging studies over the last 90 years: Kodiak's local stock fisheries has a component of Cook Inlet origin fish.

If there were something "new" in Kodiak that justified regulation change based, perhaps, on the Board's mixed stock policy Cook Inlet advocates would need to show increased "targeting" efforts in specific areas, changes in Kodiak's salmon management plans that are not based on local stocks or some new fishing pattern that hadn't previously occurred. The "hard facts" support for their proposals are missing from the Cook Inlet advocates proposal narratives. Active Kodiak seine permits are much reduced from 20 years ago During July, the Kodiak seine fleet is widely dispersed and catches far more local pinks and chums than Sockeye. And finally, new or expanding fisheries in the Kodiak Management Area are not identified because they do not exist. Consequently, Cook Inlet advocates have not met their burden to prove a basis for changing Kodiak's existing management plans. Vote NO on proposals 66, 65, 64, 63 and 37.

Thank you for your consideration of my comments.

Sincerely yours,

Wallace Fields



RE: Comment on other issues

To whom it may concern / Board of Fisheries My name is Randy Blondin, as the board is aware I have written several letters explaining my concern with the regulation change to the Kodiak Dungeness fisheries that was adopted a year and half ago (proposal #209). I am a fisherman trying to work my way through the system to get this proposal changed as it was adopted hastily. I now have the Department of Fish and Game acknowledging this proposal needs to be adjusted. (For example the regulation says we must pull our Dungeness pots every 14 days, however, all Kodiak fishermen agree that time table is unworkable and needs to be changed to 30 days. The Kodiak Department of Fish and Game now acknowledges it should be 21 days). Never the less all parties agree the regulation needs to be adjusted. What I am attempting to do is to get the regulation changed before our next Dungeness crab season May 1st, 2020. I submitted a proposal in October assuming it was going to be on the agenda for the December meeting so that there could be public testimony at the January meeting in Kodiak, however, because I was unaware of the process it was not on the agenda for the January meeting in Kodiak-so I am now trying to get a proposal on the March meeting in Anchorage. I am writing this letter because I have an important appointment in the lower 48 during the Kodiak Meeting in January. However, it is a good opportunity for other fishermen besides myself impacted by this regulation to voice their concerns. What myself and other Kodiak Dungeness fishermen are asking for at the January meeting in Kodiak is for the board to please put a proposal on the agenda for the March meeting in Anchorage where this issue can be addressed. If you have any questions feel free to contact me at 907-512-9494. Thank you, Randy Blondin

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

December



PC593
1 of 2

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 Meeting to be held March 7, 2020. It remains the case that the complexity of Alaska's fisheries enhancement programs and regulatory structure make it difficult to gain a thorough understanding of them in a single day. It is our hope that the continuation of this process, through Joint Protocol on Salmon Enhancement (#2002-FB-215), will broaden the Board's and the public's understanding of these unique and dynamic programs which are administered by their diverse regional non-profit organizations.

The Hatchery Committee meeting is an important link in gaining greater depth of knowledge related to ongoing hatchery research as well as the aquaculture associations themselves: their organizational structure, statutory and regulatory oversight, and even, to some degree, day-to-day operations. With just one day allocated to the Hatchery Committee meeting, the agenda must be both focused and specific. We suggest breaking the day into two or three presentations beginning with an introductory presentation that delves into hatchery funding and lending mechanisms which should include a presentation from the Department of Commerce, Community and Economic Development, as well as information from ADF&G that touches on fisheries management for hatchery cost recovery and brood stock, organizational structure and governance, departmental oversight, and Annual Management Plan approval. Additional presentations focused more on how hatcheries and hatchery associations actually operate from planning to achievement of production goals may also be of interest to the Board, along with review and current updates on the Alaska Hatchery Research Project.

We respectfully submit the following topic outline for your consideration:

1. Funding and Corporate Structure

- a. Department of Commerce, Community and Economic Development
 - i. Fisheries Enhancement Loan Program
 - ii. Return on investment (SET vs. Common Property Contribution)
 - iii. Lending Policy and Regulatory Structure
- b. Department of Fish & Game
 - i. Aquaculture Board Composition (Statutes)
 - ii. Cost Recovery (Statutes)
- c. Departmental Oversight and Reporting

2. Aquaculture Associations: Organizational Structure, Operations

- a. Role of Regional Planning Teams
- b. Annual Management Plans, Corporate Escapement
- c. Operational Goals, Requirements, Planning
- d. "How it Works"

3. Review and Update on Alaska Hatchery Research Project

- a. AHRP/HWI Research
 - i. Details of work and findings to-date
 - ii. Details of Continuing work, implications
- b. Identify where we have legitimate information gaps
- c. Changes in ocean environment



We believe it is important for the board continue to follow the Joint Protocol on Salmon Enhancement (#2002-FB-215). This allows 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.

We look forward to working with the Alaska Department of Fish and Game in conjunction with the Alaska Board of Fisheries to better inform the public on the Alaska Hatchery Program. We encourage this ongoing discussion as it allows for the Board and the public to gain information about an existing body of knowledge related to hatchery program and bring to light fact-based, scientific work that is ongoing within the industry. As scientists and stewards of the resource, we see this ongoing inquiry as a benefit to our programs and to the contributions we make to the State of Alaska. We look forward to continuing to bring the knowledge and benefits of these important salmon enhancement programs to the public's attention.

Respectfully,

Alaska's Hatchery Operators

Armstrong-Keta Incorporated
Angela Bowers, Executive Director

Northern Southeast Regional Aquaculture Association
Steve Reifentstahl, General Manager

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Prince William Sound Aquaculture Corporation
Tommy Sheridan, General Manager/CEO

Douglas Island Pink and Chum
E. Prestegard/K. Harms, Executive Director

Southern Southeast Regional Aquaculture Association
David Landis, General Manager

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director



ARMSTRONG-KETA, Inc.





From: [Gale K. Vick](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Recommendations for BOF Hatchery Agenda March 2020
Date: Friday, December 27, 2019 11:35:26 PM

Date: December 27, 2019
From: Gale Vick, Fairbanks, AK
To: Alaska Board of Fisheries
RE: Recommendations for BOF Hatchery Agenda March 7, 2020

Dear Board of Fisheries Members:

As a long time Alaska resident (52 years) and a former commercial fisherman, subsistence fisherman, current recreational fisherman and fisheries policy advisor, I am concerned about the long term trend of reduction in run strength and size of Chinook salmon as well as other salmon species. And I am concerned that we often do not adequately consider all potential impacts in an ecosystem context when making management decisions.

Hatcheries are part of that ecosystem equation. We are becoming increasingly aware of hatchery impacts to wild stock all along the Pacific and North Pacific coasts and the potential for threats to habitat, forage and biodiversity. The body of evidence for these complex relationships is growing significantly. As a state that constitutionally prides itself on protection of its natural resources, it is incumbent on us to pursue a *more in depth* understanding of hatchery impacts - environmentally, politically and economically - and try to do so with a single goal in mind.... the protection of wild stock.

Since the 1971 development of FRED (Division of Fisheries Rehabilitation, Enhancement and Development) and the subsequent 1974 Alaska Hatchery Act, the Alaska PNP hatchery system, which was designed to *supplement* - not replace - sustainable natural production, has increased salmon fry releases dramatically to over 1.6 billion by 2017 (*Alaska Salmon Fisheries Enhancement Report 2017*) for a return that is primarily for the commercial market, both in the common property harvest and cost recovery harvest. Some of the inherent questions are: (1) how might this production be competing with wild stock for forage food and, (2) how straying of hatchery fish to wild streams might be genetically affecting wild stock or wild stock habitat, and (3) what nutrients might be taken away from ecosystems that both wild and hatchery stock share? Essentially, we do not know; we are just beginning to catch up on the science we should have been conducting all along.

I commercially fished a mixed wild-hatchery system for over 20 years. To my knowledge, the fleet rarely, if ever, discussed hatchery impacts, even when the 1989 Exxon Valdez Oil Spill resulted in research indicating that hatchery production may be one of the causes of overall wild salmon decline. (*Assessment of the Genetic Toxicological Impacts of the Exxon Valdez Oil Spill on Pink Salmon (Oncorhynchus gorbuscha) may be Confounded by the Influence of Hatchery Fish*, Cronin & Maki 2004) } Most of us assumed that hatchery production was benign as it was “ocean ranching” and not stationary open-pen fish farms. In retrospect, I wish we had started asking questions much sooner that could have guided hatchery production and developed baseline and long-term research.

To this end, I respectfully recommend for the March 7, 2010 Board of Fisheries Hatchery



meeting the following agenda items:

- (1) Institutionalize a full day hatchery meeting every year with specific agenda
 - (a) Adopt in regulation the Joint Protocol on Salmon Enhancement #2002-FB-215
 - (b) Review protocols for hatchery reviews at every annual meeting
 - (c) Provide specifics for implementation of “precautionary approach” when reviewing hatcheries
 - (d) Develop a hatchery subcommittee of the Board to meet on a quarterly basis
 - (e) Define a “wild fish priority”
 - (f) Define “sustainability” within the context of hatchery impacts on and interaction with wild stock
 - (g) Create procedures for addressing hatchery straying
 - (h) Provide summary reporting which also includes historical charts for *all* the true costs of hatchery support - including original and on-going infrastructure, loans and grants (and their management), debt forgiveness, oversight, genetics, management, etc., *and* how some of that multi-agency support might have a negative impact on wild stock management.
 - (i) Consider the long-term viability of hatcheries within the context of changing ocean conditions
- (2) Add to every “call for proposal” a section for hatchery issues
- (3) Continue with *independent research* of various hatchery impacts and have an *independent* review team conduct peer review on the subsequent research
- (4) Provide for a catalog of research both in Alaska, Pacific Coast Canada and the entire U.S. Pacific Coast.

Thank you.

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Agenda BOF hatchery committee

December 21, 2019



PC595
1 of 1

Greetings- I respectfully submitted proposals to the Board of Fisheries in April 2019 to amend, adopt, or repeal regulations. These proposals asked for consideration for a solution to:

- inter-regional straying from PWS into LCI in high proportions into significant stocks,
- harvest strategy to intercept these feral hatchery salmon before they stray,
- wanton waste of a harvestable surplus,
- the unreliability of escapement goals from these high rates of straying.

Since escapement goals are the crown of sustainable management in Alaska, the Board of Fisheries may find it wise to adopt regulations it considers advisable to address these issues.

As directed by AS 16.10.251(c), I am writing to the board, and await a written explanation of why these proposals, and these critical issues affecting wild fish priority are continually being denied and ignored. Why were these critical issues not considered or even mentioned either at the October 2019 work session where they were moved to, listed under non-regulatory proposals, nor the December 2019 BOF LCI meeting in Seward where they were originally intended. Also why is the Board of Fisheries receiving erroneous information from ADFG as per the transcript pertaining to ACR2 that was contrary to the staff comments submitted in October about the serious issue of straying in SEAK?

These issues are at the heart of the "adverse affects" that **shall not** occur from hatchery/ wild interaction as per the Hatchery Act. The State of Alaska is out of compliance.

I respectfully ask that these issues under your authority as per AS 16.05.251¹ and AS 16.05.730² etc. will be considered at the March Hatchery Committee meeting so we stop wasting valuable time delaying addressing these problems, that will continue, and come to solution. Please:

1. Adopt in regulation the Joint Protocol on Salmon Enhancement #2002-FB-215.
2. Create procedure to address hatchery straying.
3. Unreliable Escapement goals from hatchery straying³
4. Remote Release – criteria
5. Wild Fish Priority – define
6. Request an unbiased independent council
7. Adopt in regulation clear accurate BOF authority

¹ The Board of Fisheries Hatchery Committee may adopt regulations it considers advisable for wild fish sanctuaries as per the genetics policy in the waters of the state over which it has jurisdiction;

(2) establishing open and closed seasons and areas for the taking of fish; if consistent with resource conservation..., the board may adopt regulations establishing restricted seasons and areas necessary for

(4) establishing means and methods in ... transport of fish;

(5) establishing marking and identification requirements for means used in...transport of fish;

(6) classifying as... predators or other categories essential for regulatory purposes;

(7) ... management, conservation, protection, ...propagation, and stocking of fish;

(8) investigating and determining the extent and effect of disease, predation, and competition among hatchery fish in the state, with wild fish, exercising control measures considered necessary to the resources of the state;

(9) prohibiting and regulating the...transport, or release of native or exotic fish or their eggs;

(12) regulating ... fishing as needed for the conservation, development, and utilization of fisheries;

(d) Regulations adopted under (a) of this section must, consistent with sustained yield and the

(5) the importance of wild fisheries to the economy of the state; including crab and shrimp

(6) the importance of each fishery to the economy of the region and local area in which the fishery is located;

(h) shall adopt by regulation a policy that shall provide for the management of mixed stock fisheries in a manner that is consistent with sustained yield of wild fish stocks.

² AS 16.05.730. Management of Wild and Enhanced Stocks of Fish. (a) Fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks and may be managed consistent with sustained yield of enhanced fish stocks.

³ SAAC 39.223 Policy for Statewide Escapement Goals