

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

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## **Proposal 1**

Kenai River Professional Guide Association..... PC001

## **Proposal 2**

Kenai River Professional Guide Association..... PC002

## **Proposal 6**

Danny Mathes..... PC003

Travis Brown ..... PC004

## **Proposal 7**

Chris Perry..... PC005

## **Proposal 8**

Cook Inlet Recreational Fishermen..... PC006

Jane Miles..... PC007

Kenai River Professional Guide Association..... PC008

Kenny Bingaman ..... PC009

## **Proposal 9**

Kenai River Professional Guide Association..... PC010

Cook Inlet Recreational Fishermen..... PC011

Jane Miles..... PC012

## **Proposal 12**

Kenai River Professional Guide Association..... PC013

## **Proposal 13**

Kenai River Professional Guide Association..... PC014

Nancy Hillstrand ..... PC015

## **Proposal 14**

Kenai River Professional Guide Association..... PC016

## **Proposal 15**

Kenai River Professional Guide Association..... PC017

## **Proposal 16**

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

Bob Nathanson .....	PC018
Chris Perry.....	PC019
Cook Inlet Aquaculture Association.....	PC020
Kenai Peninsula Fishermen's Association .....	PC021
Malcolm Milne .....	PC022
Matthew Alward .....	PC023
Nancy Hillstrand.....	PC024
Paul Roth.....	PC025
<b><u>Proposal 17</u></b>	
Kenai Peninsula Fishermen's Association .....	PC026
Kenny Bingaman .....	PC027
<b><u>Proposal 18</u></b>	
Seldovia Village Tribe .....	PC028
<b><u>Proposal 19</u></b>	
Seldovia Village Tribe .....	PC029
<b><u>Proposal 20</u></b>	
Seldovia Village Tribe .....	PC030
<b><u>Proposal 22</u></b>	
Dennis Nickerson .....	PC031
Stephen Vanek .....	PC032
Alan Kapp .....	PC033
Alaska Trollers Association .....	PC034
Bob Nathanson .....	PC035
Chris Perry.....	PC036
Cook Inlet Aquaculture Association.....	PC037
DIPAC.....	PC038
Kenai Peninsula Fishermen's Association .....	PC039
Kodiak Regional Aquaculture Association .....	PC040

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

Kodiak Seiners Association .....	PC041
Leif Dobszinsky.....	PC042
Malcolm Milne .....	PC043
Matthew Alward .....	PC044
Morgan Jones.....	PC045
NSRAA .....	PC046
Paul Roth.....	PC047
Prince William Sound Aquaculture Corporation.....	PC048
Purse Seine Vessel Owners Association.....	PC049
Russell Thomas, Alaska Sportfishing Expeditions .....	PC050
Sonja Woodman Corazza .....	PC051
Southeast Alaska Fishermen's Alliance.....	PC052
Southern SE Regional Aquaculture Association.....	PC053
United Fishermen of Alaska .....	PC054
United Southeast Alaska Gillnetters .....	PC055
Valdez Fisheries Development Association .....	PC056
Kenny Bingaman .....	PC057
Marguerita McManus .....	PC058
Nancy Hillstrand .....	PC059
Thomas M Buchanan .....	PC060
<b><u>Proposal 23</u></b>	
Kevin Walker .....	PC061
Alan Kapp .....	PC062
Bob Nathanson .....	PC063
Chris Perry.....	PC064
Cook Inlet Aquaculture Association.....	PC065
Kenai Peninsula Fishermen's Association .....	PC066
Kodiak Regional Aquaculture Association .....	PC067

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

Malcolm Milne .....	PC068
Matthew Alward .....	PC069
Paul Roth .....	PC070
Prince William Sound Aquaculture Corporation.....	PC071
Sonja Woodman Corazza .....	PC072
Southeast Alaska Fishermen's Alliance.....	PC073
SSRAA .....	PC074
United Fishermen of Alaska .....	PC075
Valdez Fisheries Development Association .....	PC076
chris white.....	PC077
Kevin Walker .....	PC078
Marguerita McManus .....	PC079
Nancy Hillstrand.....	PC080
<b><u>Proposal 24</u></b>	
Alan Kapp .....	PC081
Bob Nathanson .....	PC082
Chris Perry.....	PC083
Cook Inlet Aquaculture Association.....	PC084
Kenai Peninsula Fishermen's Association .....	PC085
Kodiak Regional Aquaculture Association .....	PC086
Malcolm Milne .....	PC087
Matthew Alward .....	PC088
Paul Roth.....	PC089
Prince William Sound Aquaculture Corporation.....	PC090
Sonja Woodman Corazza .....	PC091
United Fishermen of Alaska .....	PC092
Valdez Fisheries Development Association .....	PC093
Dave Seaman .....	PC094

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

Jeffrey Lee ..... PC095

Marguerita McManus ..... PC096

Nancy Hillstrand ..... PC097

## **Proposal 25**

Alan Kapp ..... PC098

Bob Nathanson ..... PC099

Chris Perry ..... PC100

Cook Inlet Aquaculture Association ..... PC101

Kenai Peninsular Fishermen's Association ..... PC102

Malcolm Milne ..... PC103

Matthew Alward ..... PC104

Paul Roth ..... PC105

Prince William Sound Aquaculture Corporation ..... PC106

Sonja Woodman Corazza ..... PC107

United Fishermen of Alaska ..... PC108

## **Proposal 26**

Alan Kapp ..... PC109

Chris Perry ..... PC110

Cook Inlet Aquaculture Association ..... PC111

Daniel Farren ..... PC112

kenai Peninsula Fishermen's Association ..... PC113

Malcolm Milne ..... PC114

Matthew Alward ..... PC115

Paul Roth ..... PC116

Prince William Sound Aquaculture Corporation ..... PC117

Sonja Woodman Corazza ..... PC118

United Fishermen of Alaska ..... PC119

Nancy Hillstrand ..... PC120

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

## **Proposal 27**

Alan Kapp .....	PC121
Chris Perry.....	PC122
Kenai Peninula Fishermen's Association.....	PC123
Malcolm Milne .....	PC124
Matthew Alward .....	PC125
Paul Roth.....	PC126
Prince William Sound Aquaculture Corporation.....	PC127
Sonja Woodman Corazza .....	PC128
United Fishermen of Alaska .....	PC129
Nancy Hillstrand .....	PC130

## **Proposal 28**

Chris Perry.....	PC131
Malcolm Milne .....	PC132

## **Proposal 29**

Nancy Hillstrand .....	PC133
Chris Perry.....	PC134
Malcolm Milne .....	PC135
Paul Roth.....	PC136

## **Proposal 30**

Chris Perry.....	PC137
Malcolm Milne .....	PC138

## **Proposal 31**

Nancy Hillstrand .....	PC139
Chris Perry.....	PC140
Malcolm Milne .....	PC141
Paul Roth.....	PC142

## **Proposal 32**

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

Marguerita McManus ..... PC143

Chris perry ..... PC144

Paul Roth ..... PC145

## **Proposal 33**

Malcolm Milne ..... PC146

Paul Roth ..... PC147

Chris Perry ..... PC148

Cook Inlet Recreational Fishermen ..... PC149

Kenny Bingaman ..... PC150

## **Proposal 34**

Bob Nathanson ..... PC151

Chris Perry ..... PC152

Malcolm Milne ..... PC153

Matthew Alward ..... PC154

Paul Roth ..... PC155

## **Proposal 35**

Chris Perry ..... PC156

Malcolm Milne ..... PC157

Morgan Jones ..... PC158

Paul Roth ..... PC159

## **Proposal 36**

Kenai Peninsula Fishermen's Association ..... PC160

Chris Perry ..... PC161

Daniel Farren ..... PC162

Malcolm Milne ..... PC163

Paul Roth ..... PC164

Cook Inlet Recreational Fishermen ..... PC165

## **Proposal 37**

# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

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Chris Perry.....	PC166
Kodiak Seiners Association .....	PC167
Kenai River Professional Guide Association.....	PC168
<b><u>Proposal 38</u></b>	
Kenai River Professional Guide Association.....	PC169
<b><u>Proposal 39</u></b>	
Adam Lalich.....	PC170
Alaska Jig Association.....	PC171
Gregory R. Gabriel, Jr. ....	PC172
<b><u>Proposal 44</u></b>	
Chris Perry.....	PC173
<b><u>Proposal 278</u></b>	
Darius Kasprzak.....	PC174
Buck Laukitis.....	PC175
Gregory R. Gabriel, Jr. ....	PC176
Adak Community Development Corporation .....	PC177
Golden Harvest Alaska Seafood/Adak .....	PC178
Ron Kavanaugh .....	PC179
Todd Hoppe.....	PC180
<b><u>Proposal 282</u></b>	
Chris Perry.....	PC181
Nancy Hillstrand .....	PC182
<b><u>Multiple proposals</u></b>	
Arthur Bloom .....	PC183
Beaver Nelson .....	PC184
Cook Inlet Seiners Association .....	PC185
Icicle Seafoods.....	PC186
Josh Wisniewski .....	PC187



# On-Time Public Comment List

Alaska Board of Fisheries: Lower Cook Inlet Finfish | Seward, Dec. 10-13, 2019

---

Native Village of Eyak.....	PC188
Office of Subsistence Management.....	PC189
Angela Bowers .....	PC190
Armando Alvarez.....	PC191
Brian Warmuth.....	PC192
Carol Harding .....	PC193
Cordova District Fishermen United.....	PC194
Daniella May .....	PC195
Jeff F. Berger .....	PC196
Jordan Stover .....	PC197
Mackenzie Smith.....	PC198
Mark Vinsel .....	PC199
Melissa Curran .....	PC200
Morgan Jones.....	PC201
Paul Owecke.....	PC202
Richard Corazza.....	PC203
Salmon Hatcheries for Alaska .....	PC204
SEAS.....	PC205
<b><u>Other topics</u></b>	
Jon R. Martin, Sr.....	PC206
Non-comment responses	

## **RE: PROPOSAL 1 Redefine the area the management plan encompasses to include all waters north of Bluff Point**

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of the KRPGA membership on Proposal 1 was split between no action and oppose.

## RE: PROPOSAL 2 Align gear restrictions for lower Kenai Peninsula roadside streams in waters closed to salmon fishing

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of the KRPGA membership on Proposal 2 is unanimously to support the proposal.

**Submitted By**

Danny Mathes

**Submitted On**

10/9/2019 12:27:21 PM

**Affiliation**

Citizen. Proposal 6

**Phone**

907-299-5199

**Email**

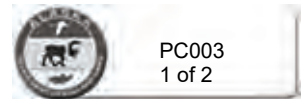
dmathes@gmail.com

(mailto:dmathes@gmail.com)

**Address**

2121 Horizon Ct

Homer, Alaska 99603



I and my Kids and grandkids have been fishing in the Barge Lagoon in the Homer Spit for the past 4 years. Many other friends too. There is no danger and the Manager even stated that he didnt mind boats coming in, just dont stand on the bank. I have never seen a barge leave (which is impossible in low tide). It is not a danger and I have seen in Hawaii and California where the owners have to make a path to allow access the the shores. Never had a problem until the last managers son took it over. He has now harassed us for the past 3 years. I travel in on my boat and do not walk across the tribes land to get to fish for the Silver Salmon that come in only on low tide twice a day. He stated that he has no problem coming in by boat because barges can't enter or leave on low tide and its not useable for them at that time. He insist that we can't stand on the bank though because it would entice others to come in which nobody can even see down there from the road or pathway. Last year as he was running off people and I stated that "oh it looks like those people (6 or so) are leaving". He stated "that's my family leaving". So he only wants his family to fish there it looks like.... i also have several friends who fish there too. It's only one month out of the year that it is fishable. August. According to the Alaska Contitution Article VIII, Section 14, states: "Free access to the navigable or Public Waters of the state, as defined by the legislature, shall not be denied any citizen of the United States or resident of the State...." This section of the constitution also empowered the state legislature to define navigable and public waters. A navigable water body under state law includes anywater of the state that is navigable in fact for any useful purpose including boating, hunting, fishing, and other recreational activities. (AS 38.05.965(13). Public water, as defined in state statute, includes navogable water and all other water that is reasonably suitable for public use and utility including havbitat for fish and wildlife in which there is a public interest... (AS 38.05.965(18). The Alaska Constitution of state statutes protect the public's right to use navigable or public waters. Under Alaska law, ownership of uplands adjacent to navigalble or public water does not grant an exclusive right to use of the water or to control public use of the water, even if the title includes the submerged land. Any land below the ordinary high water mark of navigable or public wates is subject to the right of the people to use for recreationsal or other purposes consistent with the public trust (AS 38.05.126). Such uses incude fishing. It is a misdemeanor to interfere with or obstruct a person's free passage or use of navigable water, including the land below the ordinary high water mark. This is in the Alaska Contitution and can't be changed. His argument is navigable water. It is also public water in the Constitution and Public fish. DNR ruled that ithis is navigable water.... This has been an issue in California and Hawaii and ruled that you cant keep people off the beaches and must provide them access to the beach. I'm willing to take this the the Alaska Supreme court because we can't let people dictate to stay off the ordinary High water mark. Don't start something that will allow anyone to keep people off our land....

**Submitted By**

Danny Mathes

**Submitted On**

10/10/2019 9:46:08 AM

**Affiliation****Phone**

907-299-5199

**Email**

Dmathes@gmail.com

(mailto:Dmathes@gmail.com)

**Address**

2121 Horizon Ct

Homer, Alaska 99603



After reading his request more, all I can say is he's lying about the foot and boat traffic in the lagoon. I've never seen more than two boats at one time in the lagoon and never seen a barge even move in the lagoon during the only time people can fish in there. He's exaggerating to get it shut down so people won't be on "his" bank snagging. He told us time and again that "boats are fine" "Just don't get on the bank". His barges can't even move on low tide and that's the only time to snag the silvers.



November 19, 2019

Alaska Board of Fisheries & Homer Fish and Game Advisory Committee

Re: Lower Cook Inlet Finfish - Proposal 6

Opposed

I have two concerns: My primary concern is that this proposal may inadvertently close a nearby section of public beach to sportfishing. My secondary concern is that this proposal will prohibit fishing along the beach and within the waters of the barge basin, which is an area that I believe the public has a right to use.

Primary concern:

I am concerned that this proposal will inadvertently close sportfishing to a 1/2-mile stretch of public beach between the Homer Spit Marine Terminal barge basin and the Nick Dudiak Fishing Lagoon. The attached "Map 1" shows the beach shaded in blue. Since the proposal does not identify where the new fishing boundary marker will be located, the proposal has the potential to close fishing to this public beach.

Fishing along this beach does not conflict with the use of the barge basin in any way. I have been fishing here since 2012, targeting Coho salmon by way of snagging, primarily during the month of August. This beach makes for an affordable way to harvest salmon because it has public road access and can be easily fished from shore.

Should the Alaska Board of Fisheries decide to close sport fishing within the barge basin, I request that consideration be made to limit the closure to as close as reasonably possible to the entrance channel so that fishing may continue along the beaches adjacent to the entrance channel, particularly the 1/2-mile stretch of public beach between the barge basin and the Nick Dudiak Fishing Lagoon ADF&G marker (200 yards NW of the entrance).

Secondary concern:

I would also like to express my concern that this proposal will prohibit sportfishing within the barge basin, which contains waters and beach that I believe the public has a right to use. The barge basin can be accessed from the open water and the beach can be accessed from below the high tide line at low tide. While I understand the property owner's desire to reduce uplands trespass and conflicts with the commercial use of their property, I do not believe sportfishing should be prohibited within the public areas of the barge basin without due consideration.

Sincerely,

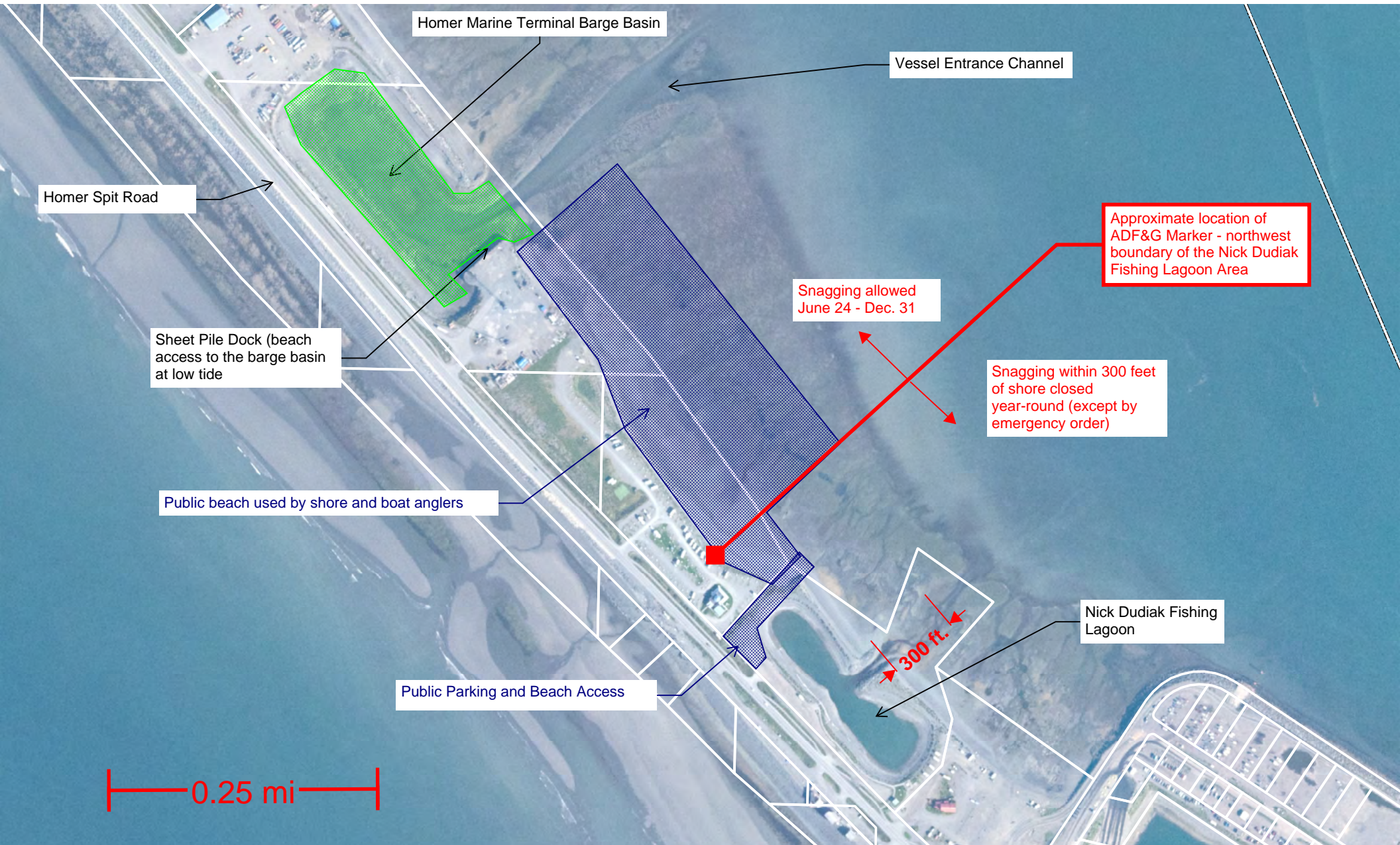
Travis Brown  
63930 Aiden Ave.  
Homer, AK 99603

Attached:

Map 1

Map 2

Map 1



Map 2





## RE: PROPOSAL 7 Redefine the area prohibited to snagging in Cook Inlet salt waters

There is plenty of opportunity for sport fishing in LCI and this changes the sport fishery in most areas to a meat harvest. This new regulation may affect escapement goals. There is also plenty of opportunity for subsistence and personal use in this area already.

## RE: PROPOSAL 8 Reduce the sport fish bag limit to one king salmon south of Bluff Point

Cook Inlet saltwater anglers are limited to 5 kings during the summer season. The most restrictive summer saltwater king fishery in the state. There is no logical or scientific reason to reduce the daily 2 fish limit to 1 fish. An angler should be allowed to catch his or her seasonal limit in 3 days if they are lucky enough to do so. Regardless if the angler spends 3 days, 5 days or 30 days on the water they can only keep 5 kings during the summer season.

## RE: PROPOSAL 8 Reduce the sport fish bag limit to one king salmon south of Bluff Point

Limiting the bag limit to 1 fish south of Bluff Pt has no scientific basis. The Department of fish itself states it only adds complexity to the regulations and “and unnecessarily restricts king salmon harvest opportunity in Cook Inlet salt waters south of Bluff Point”

## RE: PROPOSAL 8 Reduce the sport fish bag limit to one king salmon south of Bluff Point

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of the KRPGA membership on Proposal 8 is unanimous opposition. KRPGA feels the fishing pressure is low for winter kings.

## RE: PROPOSAL 8 Reduce the sport fish bag limit to one king salmon south of Bluff Point

Being a 40yr Kenai Peninsula sport fisherman and resident, I feel that the low numbers of returning King Salmon to the Kenai Peninsula must be protected to the utmost. Therefore I support this proposal in limiting the number of king salmon to be caught to 1 fish south of Bluff Point in order to ensure as many as possible King Salmon are able to return to Kenai Peninsula streams and rivers. The argument that the sport fishing charter Fleet is simply catching feeder Kings not destined for Kenai Peninsula streams and rivers is a position taken that could possibly reduce the low returning numbers of king salmon to Kenai Peninsula streams and rivers. For too long the number's of returning King Salmon to the Kenai Peninsula streams and rivers has been too low and resulted in less and less Sportfishing allowed on those streams and rivers. Catch-and-release is not a viable option. If the returning numbers are so low the sports fisherman are only allowed to catch and release, you might as well close the fishery. And close any other fishery or at least limit the numbers of fish those fisheries are allowed to harvest as they could possibly be a factor in returning numbers of King Salmon to these streams and rivers.

## RE: PROPOSAL 9 Establish a seasonal limit of five king salmon in Cook Inlet from October 1 —April 30

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of KRPGA membership is to support Proposal 9 contingent upon the adoption of a friendly amendment that includes, “Seasonal summer limit of 5 kings and a seasonal winter limit of 10 kings.”

## RE: PROPOSAL 9 Establish a seasonal limit of five king salmon in Cook Inlet from October 1 —April 30

The winter king salmon fishery in the Cook Inlet has been thoroughly evaluated and scientific studies performed by the ADF&G confirmed, a sustainable fishery with no impact on Cook Inlet stocks. ADF&G recently completed an extensive 3 year genetic study, over 12,000 fish were collected. Here are the results by the numbers. 99.8% of the winter kings caught south of Bluff Point were non-Cook Inlet origin. Winter king recreational trollers have no impact on Inlet stocks. So where do Inlet fish go? Cook Inlet kings migrate as far north as Kotzebue and as far south as British Columbia. This information is available on the ADF&G website and based on over 500 coded wire tag recoveries collected over the past 30 years. Inlet fish are intercepted throughout the North Pacific. Migrating salmon do not recognize international borders. The only reason feeder king salmon stocks are present in Cook Inlet is due to the abundance of bait fish. Simply put, without our food source, there would be no feeder kings in the Inlet. Fisheries managers in British Columbia (B.C), Washington & Oregon are well aware of this fact and have no problem with Cook Inlet providing food for their fish. Nor do they have a problem with Cook Inlet trollers catching their hatchery & wild stocks. The numbers are insignificant. The Alaska average annual saltwater king salmon catch, commercial and sport, between 2009-2018 was 456,000/year. If we add in the freshwater catch the number increases to 486,000/year. Over the past 3 years the Cook Inlet winter king harvests averaged 5,600 fish, .011percent of the total average Alaska catch. It is important to note that Inlet guideline harvest level numbers were originally established by the Board over concerns for Inlet stocks. Since then genetic studies were completed and scientifically prove Inlet king stocks are not effected by winter king recreational trollers. 99.8% of the winter kings caught south of Bluff Point are non-Cook Inlet origin. Our winter fishery is composed not only of Alaskan stocks but stocks throughout the Western Pacific. The annual saltwater catch for kings throughout Alaska, B.C, Washington and Oregon numbers in the millions. The combined annual release of hatchery raised king salmon state, federal and private for Alaska, B.C, Washington, Oregon and California is in excess of 220,000,000 kings. This does not include the hundreds of millions of wild kings which inhabit the Western Pacific. The impact our winter king recreational fishery has on the abundance of Western Pacific king salmon is insignificant. Cook Inlet saltwater recreational fishermen have the most restrictive summer king salmon bag limit in the state. Five kings for the entire summer. Our only opportunity to put any fish in our freezers and share fish with the community is during the winter months. Between Sept.1--March 30. Winter fishing is not always productive and the weather is generally uncooperative, cold and rough with very few fishable days. There is no scientific basis to restrict Inlet recreational trollers to 5 fish for the entire winter. Note: 2009'-2018' Average annual Alaska commercial catch: 370,000 Average annual recreational saltwater catch: 86,000 Average annual recreational freshwater catch: 30,000 Total 486,000

**RE: PROPOSAL 9 Establish a seasonal limit of five king salmon in Cook Inlet from October 1  
—April 30**

I would like to speak to proposal 9. I oppose this proposal. I participate in the winter king fishery as much as I can using my Tolman skiff and occasionally a trip with friends. I believe there is no scientific reason to change the season limit for the winter fishery. (Proposal 9). The data shows these are non Cook Inlet fish so there is no harm to our stock. 2nd. There is no scientific evidence that the amount of fish we catch is the reason for any decline in fishery numbers along the west coast. These are largely hatchery fish and there could be any number of reasons for poor return, the least of which is taking 5000 fish in the lower cook inlet winter fishery. I do not think this fishery is going to get much larger. Our change in winter weather with more wind and high seas just limits the number of days we can fish. There are certainly lots of participants in the two winter tournaments but from Nov to early March there are now just many many days no one can get out to fish. Add the fact most charters are on weekends and the combination of weekend and good weather are few. So to reiterate, I do not think this fishery is going to grow a lot more and I see no reason to change the season limit for the winter fishery. Thank you for your service on the board and thank you for your consideration of my input..



## RE: PROPOSAL 12 Reduce the sport fishery bag limit for lingcod west of Gore Point to one fish

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of the KRPGA membership in regards to Proposal 12 is in support. However, KRPGA does not want to see the numbers reallocated.

## RE: PROPOSAL 13 Establish a seasonal limit of two lingcod in the North Gulf coast area

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of the KRPGA membership on Proposal 13 is unanimous opposition.

## RE: PROPOSAL 13 Establish a seasonal limit of two lingcod in the North Gulf coast area

I own a fish processing plant on the end of the Homer Spit and have at times seen totes full of ling cod and rock fish targeted by charter fisheries. Since the halibut charter closures on Wednesdays and many Tuesdays, other species are getting hammered as business' try to fill in fishing time taking clients out for other species. This is not a healthy situation for ling cod, rock fish, and even salmon when in lower cycles or when taken from smaller portfolio stocks. The fleet is large, fast, with a large reach, as well as very savvy as to where to get this fish and conservative annual limits would help curb taking these stocks over the threshold of sustainability.

## RE: PROPOSAL 14 Modify the definition of bag limit to include fish landed but not originally hooked by an angler

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, the official position of the KRPGA membership on proposal 14 is to take no action.

## RE: PROPOSAL 15 Prohibit reselling of guide services by anyone other than licensed guides

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, KRPGA voted to take no action on Proposal 15.

## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

Chairman Morisky and members of the Alaska Board of Fish, I support this proposal in hopes that we can better assess the numbers of dip-netters utilizing the China Poot Lagoon salmon resource. Management, both by the Dept. and Cook Inlet Aquaculture Association, will be better served with the data that would be collected. For instance, CIAA could determine effectiveness of their program (stocking the China Poot system with Sockeye) from the personal use perspective, and could adjust the program accordingly to better suit demand. Thank you.

## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

Please support this proposal. This is a very Important proposal to bring this personal use fishery into compliance with all other personal use fisheries in Cook Inlet. This fishery has multiple user groups and is provided with the stocking project done by CIAA. There is no sport fishery or ADFG sport fish division assistance to help fund this fishery. The daily limit for personal use dipnet fishing is 6 fish and another 6 fish for the sport fishing from China Poot bay. That is 12 fish per person with no annual limit or requirement for catch report. At this time there hasn't been any enumeration of the personal use or sport harvest of these sockeye since 1995. From observations in the harbor and in China poot bay there are a lot of daily repeat users catching there full limits per passenger on the boats. Without priority for cost recovery fishing on these stocks this fishery could easily disappear. With the large number of users I think there should be an annual personal or family limit on the harvest of these fish like all the other personal use fisheries in CI. I personal know people that harvest in excess of 500 fish on there boats each summer with no upper limits. I also believe the daily limit should be reduced to 6 fish per day caught either in the personal use and or sport fishery combined with an annual limit for the personal use fishery. There should not be any attempt to reallocate these fish away from CIAA or the common property fishery as they are the financial supporters of this fishery.



November 21, 2019

**Board of Fisheries****Proposal 16 - Support**

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is a non-profit corporation founded in 1976 to provide and protect the salmon resource in Area H. We produce hatchery-born, ocean-raised salmon for the common property fishery in Cook Inlet and the outer Kenai Peninsula. Maintaining and improving salmon habitat and natural salmon populations is also an important part of CIAA's work. We recognize the value of both hatchery and naturally produced salmon fisheries.

We are writing today to offer our support of Proposal 16, which would require a permit to participate in the China Poot Bay personal use (PU) salmon fishery. This fishery continues to grow in popularity. With no permit requirement in place currently there is no method of determining fishery harvest numbers and effort.

This is a complex project for CIAA and these important data elements will help to determine sockeye returns to the China Poot Bay, which are the result of stocking efforts involving CIAA's Tutka Bay Lagoon Hatchery and Trail Lakes Hatchery.

Having these data elements will assist Alaska Department of Fish and Game to better manage the China Poot Special Harvest Area (Statistical Area 241-92) in which these fish are returning. This data will also assist CIAA in better evaluating the hatchery programs that provide the sockeye salmon for this important fishery to many Alaskans.

The Kenai Peninsula currently has permit requirements for the PU dipnet fishery at Fish Creek, Kasilof River, and Kenai River where valuable data is generated through the permit reporting requirements.

CIAA strongly supports proposal 16.

Respectfully,

Dean Day  
Executive Director



## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

KPFA supports the proposal requiring a permit to participate in the Kachemak Bay Personal use dipnet fishery. The fishery is growing and keeping track of the harvest is important quantify the harvest impact on this commonly owned resource. Without permits there is no way for the department to manage responsibly or to enforce residency and bag limits.

## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

As a lower Cook Inlet seine permit holder and board member of Cook Inlet Aquaculture Association I support this proposal to assist in quantifying the sockeye returns to China Poot. A permit requirement would also aid with education and enforcement in a growing fishery.

## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

Alaska Board of Fisheries Alaska Department of Fish and Game, Boards Support Section P.O. Box 115526 Juneau, Alaska 99811-5526 Re: Support for proposal 16 Dear Chairman Morisky and Board of Fisheries members, I am a Homer resident and commercial salmon fisherman and I support proposal 16 that would require a permit to participate in the China Poot Bay personal use dip net fishery. I am a supporter of the China Poot Bay personal use dip net fishery, but I believe that in order to participate you should be required to have a permit just like all of the other personal use dip net fisheries on the peninsula. This fishery appears to be growing but without requiring a permit Fish and Game has no quantitative means to track participation or numbers of fish removed, and they also cannot accurately estimate returns to China Poot Bay. A permit would also help with enforcement of bag limits. I ask that you consider supporting proposal 16 that would bring the China Poot Bay personal use dip net fishery into regulation conformance with the rest of the peninsula personal use dip net fisheries. Sincerely, Matthew Alward

## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

PROPOSAL 16 -SUPPORT 5 AAC 77.545.Require a permit to participate in the China Poot Bay personal use dip net fishery on hatchery stocked fish. With easy access from the Homer Spit, this dip net fishery has become popular yet very disorganized. LCI seiners, (CIAA Board), are concerned that sport fishers may be taking too many of their very costly stocked sockeye. These hatchery sockeye are English Bay Stock, incubated in Trail Lakes hatchery then flown in from 150 miles away. There are no other sockeye salmon systems nearby to worry about hatchery fish straying. These China Poot stocked hatchery fish, represents only .01% - .02% of the total number of fish released at the Tutka hatchery creating an impact to the ecosystem that is 83% less as compared to the enormous magnitude released at Tutka Lagoon Hatchery. While needing management to protect habitat, and the Dungeness Crab rearing area in this estuary, these reasonable releases are not perceived as having an impact on park resources. The Board may wish to request the legislature revisit their Sockeye Salmon Stamp idea similar to the King Salmon stamp, so sport fishers have a means to contribute to production of these fish for management, pathology, and genetics research required to execute an orderly fishery. King Salmon stamps have raised \$2-\$3,000,000 annually in that popular program.

## RE: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery

This will help ensure these enhanced fish that are paid for by commercial fishermen are going to residents of Alaska. This will also help Cook Inlet Aquaculture get some data about the number of fish harvested to help with their scientific data for run returns.

**RE: PROPOSAL 17 Require that the permit holder be on site during the operation of personal use set gillnet gear**

KPFA supports this reasonable proposal to make sure users stay within limits. Fish move swiftly and untended nets can fill quickly and exceed harvest limits if not monitored as all other personal use fisheries require.

**RE: PROPOSAL 17 Require that the permit holder be on site during the operation of personal use set gillnet gear**

This appears to only be a common sense requirement. Therefore I fully support this proposal.

## RE: PROPOSAL 18 Extend the subsistence salmon fishery in Seldovia Bay through June 30

Extending the closure date from May 31 to June 30 will not create any conservation concerns with any of the fish species targeted during this fishery. Most everyone is after sockeye salmon and not so much the Chinook salmon that are moving through the area. There is a 200 Chinook limit on this fishery that has never been surpassed. There is no reason that with this extension into June that this would be an issue. The salmon that are moving through this area are going to other places because Seldovia streams are pink and chum streams. This fishery would take place on the days that the commercial fishermen are not fishing so would not be in direct competition for the fish coming by Seldovia Bay.



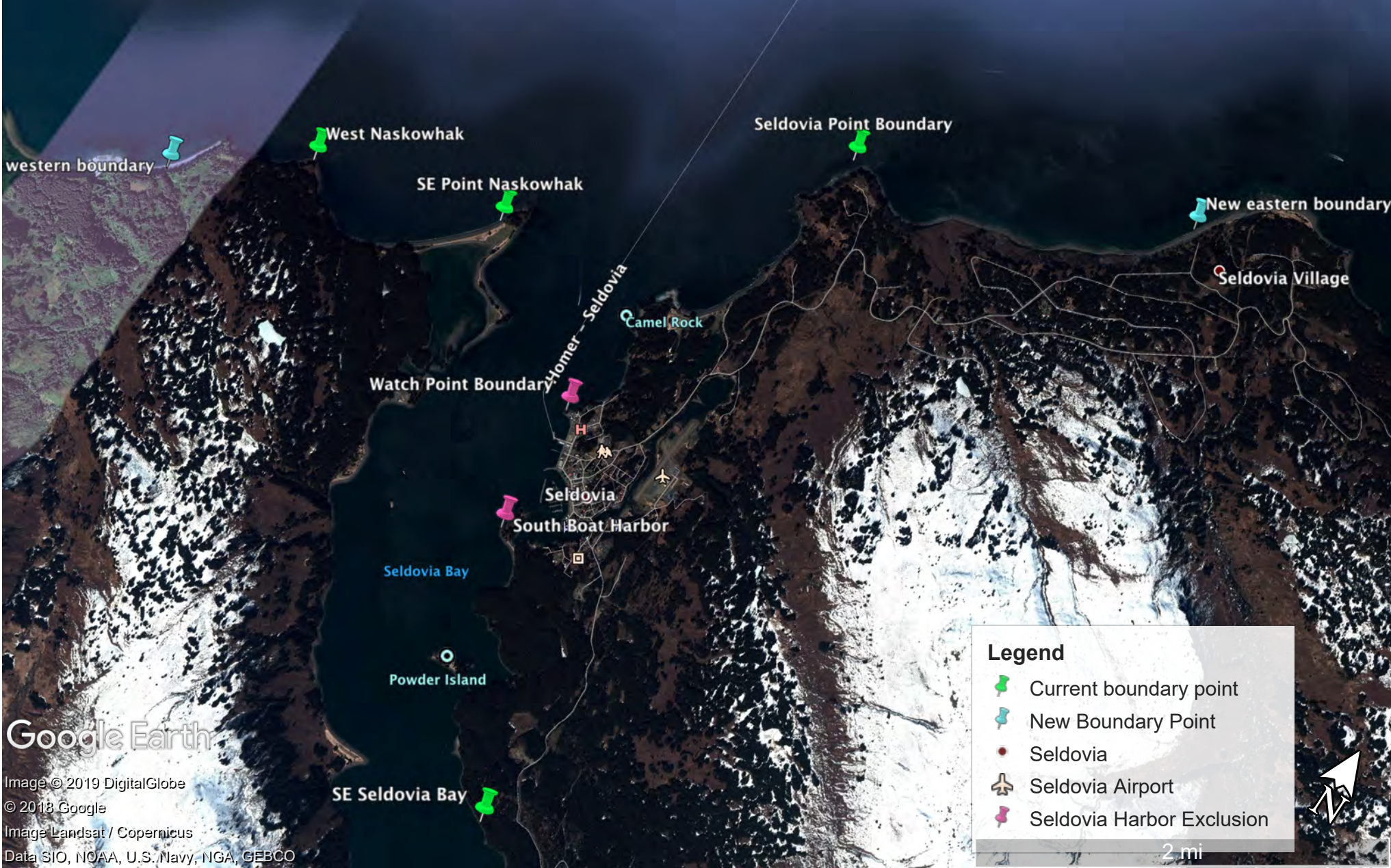
## RE: PROPOSAL 19 Extend the boundary in Seldovia Bay where salmon are customarily and traditionally taken or used for subsistence

This proposal is to open up area outside Seldovia Bay only and not the West side of Seldovia Bay as stated in the proposal that is in error in the proposal book. Extending this area will give more people more opportunity to get fish to fill their jars, freezers, and smokers. This is not competing directly with commercial fishing ground since this fishing area would be open during the commercial closures and is not in a commercial fishing area. The Tribe is asking to open from a point 600 yards East of 4th of July Creek to Point Naskowhak and from Seldovia Point to 700 yards West of Barbara Creek. see attached file.



# Proposed New Seldovia Subsistence Boundaries






from a point ~ 600 yards E of 4th of July Creek to Point Naskowhak, & Seldovia Point east to ~ 700 yards W of Barabara Creek.



Google Earth

Image © 2019 DigitalGlobe  
© 2018 Google  
Image Landsat / Copernicus  
Data SIO, NOAA, U.S. Navy, NGA, GEBCO

**Legend**

-  Current boundary point
-  New Boundary Point
-  Seldovia
-  Seldovia Airport
-  Seldovia Harbor Exclusion

2 mi



## RE: PROPOSAL 20 Allow set gillnets to be operated for subsistence purposes within 300 feet of each other in the Cook Inlet Area

This proposal was meant to only include the Seldovia fishing area and not all of Cook Inlet. There are other locations in the state that have their fishing nets set at 300 feet or closer. removing the 600 foot limit would give more people more opportunity to fish in the area where good fishing takes place.



Date: 25 November 2019

To: Board of Fisheries

From: Dennis Nickerson

Re: Comment

Greetings,

My name is Dennis Nickerson and I live in Klawock, located on Prince of Wales Island in southern Southeast Alaska. I am a Tlingit, born and raised in Klawock, home of Alaska's first salmon cannery. My family lives a customary & traditional lifestyle. Our annual salmon harvest strengthens our family bond and improves our health.

Klawock's history involves migrating salmon. Our culture intertwines with all species. "Tlingit New Year" begins on the New Moon in July- when salmon return home to the rivers of the Pacific Northwest.

I also have the honor to serve as Tribal Representative for the Southern Southeast Regional Aquaculture Association. During my first term, I was introduced to the impacts that hatcheries play in Alaska. They provide economy for all Alaskans and enhance our Alaska Native culture- since we rely on salmon.

I'm pleased to provide a comment- specifically in opposition to Proposal 22. This proposal will change the entire dynamic of funding for non-profit salmon hatcheries all across Alaska. Cost Recovery is the primary means of funding for an organization. As hatchery projects mature, the need for cost recovery will diminish while common property contributions are targeted at the 50-70% range.

Thank you for your time and this opportunity.

Respectfully,

Dennis Nickerson  
Klawock, Alaska

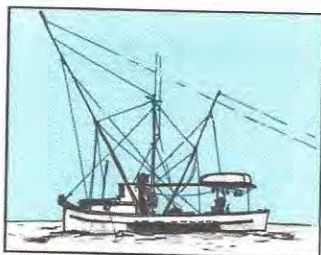
25-Nov-19  
Date

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I am a member of the Cook Inlet RPT but this is my own comment. This question was dealt with at the Board meeting in Sitka in 1983. I was a member of the RPT then and was at the meeting in Sitka. It was then decided that this was not the purview of the Board. The Dept. of Commerce opposed it then as now since there are outstanding loans that the Board cannot interfere with by telling hatcheries how much they need for loan repayments and hatchery operations. This proposal should have been rejected at the outset and should not have made it into the proposal book. Stephen Vanek

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

My opinion is that there should be no restrictions placed on cost recovery fisheries to pay for the operations of a salmon hatchery.



## Alaska Trollers Association

130 Seward #205  
Juneau, AK 99801  
(907) 586-9400  
alaskatrollers@gmail.com

November 25, 2019

RE: Proposal 22

Dear members of the Alaska Board of Fisheries,

Alaska Trollers Association would like to comment on Proposal 22 before you which would cap the number of each salmon species harvested in cost recovery operations.

We oppose this proposal because it sets a troubling precedent. Changing the 30% "guideline" to a "hard cap" will unnecessarily reduce the flexibility of the non-profits to tailor their harvest plans to individual circumstances.

We appreciate this opportunity to provide our brief comments on this matter.

Sincerely,

Amy Daugherty  
Director, ATA

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

Chairman Morisky and members of the Alaska Board of Fish: I oppose this proposal as it would severely handicap all hatcheries in Alaska in their ability to raise operating revenue. This would put additional pressure on the State budget as these hatcheries would have to resort to additional loans and would be less able to pay off existing loans. Also, I feel the author of this proposal grossly mischaracterizes the motivation behind pink salmon production (focus, he says) and Cost Recovery. Pinks are produced in greater numbers because: 1) Pink salmon streams are more susceptible to failure (no overlapping generations) than for other salmon species and are therefore more likely to need rejuvenation. 2) Pinks hold a relatively stable position in the seafood market in spite of (or because of) their low unit value, so fishermen consider them valuable in volume (and spend considerable capital gearing up to harvest them). Cost Recovery is strictly focused on the goal of establishing viable, sustainable returns for minimal cost. It takes time for a non-profit organization to develop to this level. Early years are especially difficult, and vagaries of nature (e.g. climatic influence) can delay or even temporarily stall this development. Lets not strangle the child before it has a chance to grow. The Dept., through initial permitting and continuing RPT process, oversee and regulate hatcheries. This includes keeping hatchery management in compliance and on task. The current Cost Recovery program is a vital part of that process. Thank you.



## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

Would jeopardize ability of hatchery to operate and perform cost recovery. This would change the permits already established for hatchery production and cost recovery.



November 21, 2019

**Board of Fisheries**

**Proposal 22 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is a non-profit corporation founded in 1976 to provide and protect the salmon resource in Area H. We produce hatchery-born, ocean-raised salmon for the common property fishery in Cook Inlet and the outer Kenai Peninsula. Maintaining and improving salmon habitat and natural salmon populations is also an important part of CIAA's work. We recognize the value of both hatchery and naturally produced salmon fisheries.

Proposal 22 addresses all Private Nonprofit Salmon Hatcheries statewide. Alaska's salmon hatchery program is well regulated and has operated successfully for over 30 years. Additional regulations limiting the ability of hatchery programs to self-fund are not needed.

The Legislature enacted statutes to permit private non-profit corporations to operate State hatcheries, with no cost to the State of Alaska, under the oversight of Alaska Department of Fish and Game (ADF&G). All operators work within Regional Salmon Plans guiding the program. The Cook Inlet Regional Planning Team (RPT) meets two times per year where the prior season is reviewed along with Annual Management Plans that guide the upcoming season. This is a well-established public process.

Funding for CIAA is achieved through licensing a portion of returning salmon (cost recovery), state loans, periodic state, federal, and other organizational grants, and a 2% salmon enhancement tax paid by commercial salmon fishermen. Funding is not specific to the needs of a single facility but for many projects throughout the organization.

CIAA engages in hatchery management as well as habitat protection and restoration. Activities include: lake fertilization, flow control operation, fishway management and construction, habitat surveying, invasive species monitoring and control, educational programming, and cooperative projects that support ADF&G research and management.

One of the many goals of CIAA is to conduct salmon rehabilitation and enhancement projects to significantly contribute to common property fishery harvests. Currently two hatcheries are under project development: Tutka Bay Lagoon Hatchery is an older State-owned facility operated by CIAA that continues to require upgrades and improvements. The facility reopened in 2011 and is in the process of building the pink salmon enhancement program for Tutka Bay. Port Graham Hatchery is also under project development—the facility has been upgraded and is now in the middle of developing its pink salmon enhancement program in Port Graham. CIAA has taken on the task of trying to bring two facilities online basically at once. Having two facilities under project development simultaneously requires a larger percentage of returning fish for cost recovery.

*Salmon enhancement today means better salmon fishing tomorrow.*



Cost recovery is the primary means of funding operations under project development. As hatchery projects mature cost recovery will diminish while common property contributions increase.

CIAA opposes proposal 22.

Respectfully,

Dean Day  
Executive Director,



**Douglas Island Pink and Chum, Inc.**

2697 Channel Drive • Juneau, Alaska 99801  
(907) 463-5114 • [www.dipac.net](http://www.dipac.net)

Alaska Dept. of Fish and Game  
Alaska Board of Fisheries  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
Via Email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

November 25, 2019

**RE: Proposal 22 – Oppose**

Chairman Morisky, Members of the Alaska Board of Fisheries,

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit hatchery corporation based out of Juneau, Alaska. The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.

**DIPAC opposes BOF proposal 22:** *Cap the number of each salmon species harvested in cost recovery operations.*

In 1991, the Board of Fisheries directed Northern Southeast Regional Aquaculture Association (NSRAA) and Southern Southeast Regional Aquaculture Association (SSRAA) to coordinate a southeast area wide allocation plan for all enhanced salmon. From this request, the Southeast Allocation Task Force (SATF) developed an allocation plan that included the following performance goal as one of its guiding principles, “Hatchery program plans and performance, over time should provide a 70% contribution (after broodstock) to common property fisheries.” The Board of Fisheries adopted the Southeastern Alaska Area Enhanced Salmon Allocation Management Plan in 1994 (5 AAC 33.364).

The cost recovery guidelines of 70% contribution (after broodstock) to the common property and 30% cost recovery to the PNP is always the goal, however, many complicating factors can dramatically influence cost recovery harvest rates. Several of the complicating factors include, but are not limited to, market value of the salmon, returning numbers of salmon, the average size of the salmon returning, specific environmental aspects of the special (or terminal) harvest area in question, operating and capital budgetary needs of the hatchery program in question, and the loan repayment needs of the hatchery in question (as required in AS16.10.505). In planning for and during cost recovery fisheries, the guideline harvest shares goal, due to the above stated factors, cannot always be met and must be adjusted in-season to mitigate any potential failures in cost recovery or broodstock goals.



Please reject proposal #22. The cost recovery program for PNP hatcheries is a necessary tool for self-funding, and limiting the number of salmon that can be taken could lead to catastrophic financial failures of all hatchery programs. More specific information about the PNP cost recovery fisheries can be found in AS 16.10.455.

Respectfully,

A handwritten signature in blue ink, appearing to read "Eric Prestegard", is written above the typed name.

Eric Prestegard  
Executive Director – DIPAC

A handwritten signature in blue ink, appearing to read "Katie Harms", is written above the typed name.

Katie Harms  
Tourism and Education Manager – DIPAC

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

KPFA opposes Proposal 22. This proposal will hurt or eliminate funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for such organizations. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



November 22, 2019

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

Dear Chairman Morisky and members of the Board of Fisheries,

KRAA opposes proposal 22 which focuses on the Tutka Bay Hatchery but would have impacts on all of Alaska's Private Non-Profit (PNP) hatcheries. Proposal 22 is another example of an over-broad proposal that ignores differences between discrete hatchery operations, Alaska's aquaculture associations, and the regions in which they operate.

Simply stated, wild salmon runs are unpredictable, annual salmon size is variable, and prices paid for wild salmon are volatile. Proposal 22, by seeking a fixed percentage allocated to cost recovery for every hatchery, minimizes or ignores these realities. In contrast, Aquaculture Associations cannot afford to do so. Aquaculture associations have fixed costs, and annual budgets are developed with a specific amount of revenue in mind. If fish amounts and size and price are variable and aquaculture budgets are somewhat fixed, the only way to balance aquaculture association budgets is elasticity in the amount of hatchery fish that are harvested as "cost recovery" each season. Said differently, placing an arbitrary limit on the yearly "cost recovery" number or proportion of an enhanced return is likely to result in frequent underfunding of aquaculture associations and would limit programmatic flexibility. Smaller programs, ones typically benefitting non-commercial users, would likely be cut or limited due to lack of funding. Ironically, fixed cost recovery limits could result in more hatchery releases to increase overall hatchery production as well as new cost recovery fisheries as regional associations are forced to conduct directed cost recovery fisheries on returns for smaller programs.

The summary of Alaska's hatchery history provided in Proposal 22 is selective and inaccurate. When the Alaska Legislature established the public-private partnership between the State and the PNP hatchery associations, they enacted specific legislation to provide dual funding mechanisms for the organizations: through Salmon Enhancement Tax (regional associations) and Cost Recovery Fisheries. Both mechanisms rely on commercial fishing activity to fund hatcheries. However enhancement programs create "common property" fish that benefit all regional stakeholders – sport, subsistence, personal use and commercial.

Proposal 22 indicates frustration that aquaculture associations "rely on pink salmon" for cost recovery activities. Setting aside the proposers' erroneous assertions regarding perceived "impacts" from hatchery produced pink salmon, the proposer's thesis that pinks "are the easiest to rear" and therefore aquaculture



associations raise them solely for the purpose of cost recovery is nonsensical. Low cost of production and higher survival rates result in less cost recovery, not more. If the proposer's overarching desire is to limit cost recovery fisheries, low-cost hatchery produced pinks is an effective path to that goal.

Hatchery programs in the State of Alaska are well-established, highly regulated, and have consistently contributed to the common property fisheries of the various regions in which they exist. When programs are weak or fail to contribute to the common property as anticipated, it is the fiduciary responsibility of the association's Board of Directors to evaluate and consider cost-to-benefit profiles and make changes. However, the Comprehensive Salmon Plans for each region and the Annual Management Plans for each facility typically provide the objective benchmark. Should the aquaculture association fail to address issues, the Alaska Department of Fish & Game has the authority to review and evaluate programs and adjust permits.

In summary, there is no "one-size fits all" formula for cost recovery activities around the state. Flexible cost recovery decisions are essential budgeting components for each of the regional aquaculture associations and PNPs. Limiting cost recovery fisheries hurts all enhancements efforts and negatively impacts all salmon resource users. Consequently, KRAA asks you to reject proposal 22.

Executive Director



# KODIAK SEINERS ASSOCIATION

PO Box 8835, Kodiak, AK 99615

[kodiakseiners@gmail.com](mailto:kodiakseiners@gmail.com)



November 25, 2019  
Alaska Board of Fisheries  
Alaska Department of Fish and Game, Board Support Section

## Re: Opposition to proposal 22

### DEAR CHAIRMAN REED MORISKY AND THE ALASKA BOARD OF FISHERIES,

Thank you for the opportunity to comment on Proposals 22 in advance of the Board meeting for Lower Cook Inlet. The Kodiak Seiners Association (KSA) respectfully requests you oppose this proposal as it poses a hindrance to the effective management and prosecution of the Kodiak Management Area (KMA) salmon fishery.

Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, local Kodiak and Homer businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADFG, the Board of Fish and our state legislature.

Proposal 22 poses implications relative to the Kitoi Bay hatchery located in Kitoi Bay with the Kodiak management area. This hatchery contributes not only pink salmon and chum salmon which help to support the local seine and gillnet fleet, but also to recreational users through king salmon, Coho, and sockeye production which helps to increase availability of multiple species to the road system of Kodiak for sport fish users, and subsistence users in 3 of the local native villages around the Kodiak archipelago. Many of the sport fish and subsistence projects are supplemented in part by funding from enhancement taxes in the KMA as well as the cost recovery fishery which provides the bulk of Kodiak Regional Aquaculture Association's (KRAA) operating budget. Proposal 22 would seek to place restrictions on the number of fish to be caught in a cost recovery fishery and in an industry such as salmon, with variations in price and fish abundance, would cripple the ability of an organization such as KRAA from setting a cost recovery



goal at a reasonable level to provide funding for relevant projects and operations. KSA believes everyone loses under proposal 22. As it relates to proposal 22, KRAA would be unable to fund new projects to allow increased opportunity in the sport, subsistence, or commercial fisheries sectors.

We respectfully ask the Board to reject this proposal and protect the Alaska state hatchery programs and oppose proposal 22. 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 continues to apply consistency in designing regulations while applying the guiding BOF policies.

Sincerely,

Nate Rose

President-Kodiak Seiners Association

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I oppose proposal 22. Limiting the cost recovery of PNP operators will only hinder the organizations ability to operate. Cost recovery pays for operations, maintenance, and capital projects while providing fish to commercial, recreational, and substance users.

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I am an area H purse seine permit holder and oppose this proposal. As a board member of Cook Inlet Aquaculture Association as well as Cook Inlet Seiner Association I'd refer to and support their comments as well.

November 25, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 22**

Dear Chairman Morisky and Board of Fisheries members,

I am a Homer resident and have been operating my own commercial seine vessel for 15 years and I am opposed to proposal 22. As an Alaskan salmon fisherman I raised my kids on the back deck of our boat and the hatchery programs and the cost recovery operations that support them have contributed to their fishing experience.

First I would like to point out that as written proposal 22 would apply to all nonprofit salmon hatcheries in the state and as such should be taken up at the statewide finfish meeting, not the Lower Cook Inlet finfish meeting. I feel that the fact that this is a state wide proposal it should not be considered at the Lower Cook Inlet board of fisheries meeting.

Second I believe that private nonprofit hatchery associations need to have the flexibility to set cost recovery goals that allow them to perform to their permits issued under AS 16.10.400. Hatchery operators operate multiple hatcheries that make up the whole of their private nonprofit hatchery associations, and as such may choose to take more fish from a particular hatchery in order to cover costs for the association as a whole. This allows them to make fish returning to other association hatcheries available to common property fisheries. If the board was to set limits of cost recovery fish available to each individual hatchery that would force hatchery operators to take more fish from other hatcheries that would have been available to common property.



It is an unknown how many fish will return to a hatchery from the numbers of fry released. To set a fixed number of fish available for cost recovery fisheries to each hatchery does not at all take into consideration that returning fish numbers vary greatly year to year. Also just because a hatchery has a permit for a specific egg take amount, that does not in any way mean that a certain amount of fry will be released each year and a setting a fixed number of fish that are available for cost recovery does not take that annual fry release number into consideration. If you looked at the annual cost recovery goals for any private nonprofit hatchery association you would see that they vary greatly from year to year and it would be very difficult, if not impossible to operate under a fixed number of fish available from each hatchery for cost recovery.

Hatchery operators need to have flexibility in cost recovery operations in order to maintain financial stability. For that fact along with the fact that this proposal is a statewide not Lower Cook Inlet proposal I ask you to consider opposing proposal 22.

Sincerely,

Matthew Alward

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

This would change the revenue model for not only Tutka Bay Lagoon Hatchery but every hatchery in the state. Limiting a hatchery's ability to sustain is a way for opponents to try to cut the legs out of a hatchery so they can then come back and claim its not economically sustainable.

**NORTHERN**  **SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

(907) 747-6850  
FAX (907) 747-1470  
EMAIL [steve\\_reifenstuhl@nsraa.org](mailto:steve_reifenstuhl@nsraa.org)

1308 Sawmill Creek Road Sitka, Alaska 99835

November 20, 2019

## Board of Fisheries

### Opposition to Proposal 22

Dear Chairman Morisky and Board of Fish Members:

Northern Southeast Regional Aquaculture Association (NSRAA) represents some 2,000 limited entry salmon permit holders in Southeast Alaska, consisting of a twenty-five member elected board of directors representing commercial fishermen, sports, subsistence, conservation, municipality, Native organization and other interests, and provides benefits to Alaska common property fisheries. These diverse fisheries have both economic and priceless experiential opportunities.

**Proposal 22 Oppose:** Cap the number of each salmon species harvested in cost recovery operations.

This proposal is outside the authority of Board of Fish (**Sec.16.10.450**). The issue of proportion of return harvested for cost recovery versus common property harvest is fully considered in regional comprehensive salmon plans (**Sec. 16.10.375**) and frequently cited as a guideline 70% to common property fisheries and 30% for broodstock and cost recovery purposes, although it varies by organization and economic circumstances. Of equal importance, due to Department of Commerce loans to PNP hatchery organizations (**Alaska Title 3 Banking, Securities...**) which are secured specifically by future hatchery cost recovery monies, the proposal would likely be illegal and a burden to the State of Alaska (**3 AAC 81.050**). Finally, the proponent seems to lack an understanding of the fundamentals of Alaska's enhancement program. Enhancement programs were designed to supplement fisheries, while cost recovery is conducted to pay the operational and capital costs of the programs with no cost to the State of Alaska.

The cost of raising salmon in a hatchery environment varies greatly by species, Chinook are the most expensive while pinks are the least expensive by an order of magnitude. Chum fry at release cost about a cent and a half (\$0.017), Chinook salmon for comparison cost about 35 cents/smolt, or twenty times as much. Coho and sockeye are closer to the Chinook cost model, while pinks are very similar to chum costs. Chum and Chinook also have a significantly different cost and value structure, on a cost to benefit basis, chum come in at 7:1 benefits to cost, while Chinook are 1:1 or even less. How this translates to the business of raising fish is that chum and pink returns pay for Chinook, coho, and sockeye programs. The 2019 NSRAA programs had a value of \$15.8 million to commercial fisheries, 90% of which was from chum salmon caught by net groups and troll. Cost recovery harvest value was an additional \$5.47 million or 20% of the total NSRAA salmon return. These values do not include sport fish contributions and value.

The proponent mistakenly states that when ADF&G operated and funded the hatchery program State employees were under no obligation to produce a certain amount of fish. Implicit in this statement is the State bore the cost burden of the programs with little concern for the beneficiaries, in other words the





citizens of Alaska. The Alaska Legislature made a similar evaluation and legislated away ADF&G's FRED Division in the late 1990s with the intent of reducing State expenditures and increasing the enhancement program efficiencies (**Legislative Review of Alaska Salmon Enhancement Program, 1992**). Indeed, since that time the outcome of the transfer of costs and program development to private non-profits has resulted in well over a billion dollars in salmon ex-vessel value from the PNP programs.

The PNP's boards consist of elected and appointed user groups and interested persons; their primary goal is to get as high a percent of the returning salmon to fishermen. However, the fiduciary responsibility of the PNPs is to maintain financial stability in order to perpetuate the programs, and sometimes that means harvesting a proportion of the return greater than the 30% guideline. All enhancement programs are not created equal, each having a different complex of species, marine survival, and release site opportunities. Additionally, marine survival of one release location or species can vary dramatically from another, which greatly complicates consistent cost recovery revenues and common property contribution.

Please reject proposal 22, as adoption would hobble PNP's ability to benefit fishermen and coastal communities, reduce opportunity in common property fisheries, and compromise Department of Commerce from collecting loan payments.

I look forward to working with the board on this issue at the Seward meeting.

Thank you for your attention to this matter.

Respectfully,

Steve Reifstahl  
General Manager, Northern Southeast Regional Aquaculture Assoc.

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

Cost Recovery fishery goals are based on the cost to produce fish for an organization. To limit the number of species of cost recovery will make it impossible to continue operating the hatchery without paying for the operation.



November 25, 2019

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Submitted via online comment form and email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

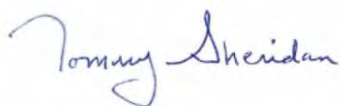
**RE: PWSAC opposes Proposals 22, 23, 24, 25, 26 and 27**

Dear Chairman Morisky and Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization employing 45 full time staff members and 75 seasonal workers and a budget exceeding \$14 million annually which is funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and many thousands more stakeholders who benefit from PWSAC production, including: commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists and salmon processors.

PWSAC is **OPPOSED** to Proposal 22, which seeks to cap the number of salmon species harvested in hatchery cost recovery operations. We believe that the Alaska Board of Fisheries lacks the statutory authority to take the action as requested by the Proposers. The Alaskan Legislature invested the Alaska Department of Fish and Game with the legal duty to oversee all aspects of hatchery creation, operation, and production, whereas the Board is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve. As part of the Department's oversight of hatchery production, there is an intricate and public system of annual hatchery plans that are reviewed annually by the department. These Annual Management Plans (AMPs) are reviewed and discussed in public forums known as Regional Planning Teams (RPTs), which address how hatchery operators conduct their cost recovery harvests at each hatchery and address other specifics of hatchery operations. The Department and the Board have respected and abided by these processes and this division of labor for over 30 years, and we request that this relationship continues. Please reject Proposal 22. Further, PWSAC also opposes Proposals 23, 24, 25, 26 and 27.

Sincerely,



Tommy Sheridan  
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES  
FOR ALASKA AND THE WORLD**

P.O. Box 1110 · Cordova, Alaska 99574  
P. 907 424 7511 · F. 907 424 5508

[www.pwsac.com](http://www.pwsac.com)



1900 W Nickerson St., Ste. 320 ■ Seattle, WA 98119 ■ Tel: (206) 283-7733 ■ Fax: (206) 283-7795 ■ [www.psvoa.org](http://www.psvoa.org)

November 25, 2019

**VIA E-MAIL**

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115826  
Juneau, AK 99811

**Re: Oppose Proposal 22 Limits on Cost Recovery Fisheries**

Dear Chair Morisky and Board of Fisheries Members:

The Purse Seine Vessel Owners Association (“PSVOA”) respectfully submits the following comments in opposition to Proposal 22. PSVOA represents purse seine vessel owners throughout Alaska and the Northwest, including seiners who participate in the Southeast, Kodiak, and Prince William salmon seine fisheries.

Proposal 22 applies to all Alaska private nonprofit (“PNP”) salmon hatcheries. Alaska’s PNP salmon hatcheries are well regulated. These hatcheries have operated successfully over 30 years. Proposal 22 calls for regulations that would limit the ability of the PNP salmon hatcheries to prosecute cost recovery fisheries, which is their primary funding source.

Proposal 22 cites operations by the Cooke Inlet Aquaculture Association (CIAA). CIAA, like all other Alaska PNP salmon hatcheries, are well regulated. All PNP operators work within Regional Salmon Plans, Hatchery Basic Management Plans, and annual management plans, which guide the hatchery programs. The Regional Salmon Plans and Basic Management Plans are developed through Regional Planning Teams (RPTs), which is an open and transparent process. Plans for cost recovery fisheries are vetted by the RPTs as part of this open and public process. Moreover, each PNP has different funding needs based on the availability of other funding sources and the number of enhancement projects a PNP is involved in. Imposing arbitrary cost recovery limits on all PNPs without consideration for each PNPs financial need on an individual basis is bad policy. Accordingly, PSVOA opposes Proposal 22.

PSVOA appreciates the opportunity to comment on Proposal 22, and thanks the Board for its consideration of the same.

Very truly yours,

*/s/ Robert Kehoe*

Robert Kehoe, Executive Director  
Purse Seine Vessel Owner's Ass'n

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I am the manager of Alaska Sportfishing Expeditions, a group of family owned and operated fishing lodges operating in Ketchikan. Our guests are the beneficiaries of the Southern Southeast Regional Aquaculture Association's (SSRAA) Chinook, Coho, and Chum production as those fish move through the common property fishery and in terminal areas at Neets Bay and Herring Cove. This proposal seems to address problems with pink salmon rearing in lower Cook Inlet but, if passed as written, would apply to hatcheries throughout the State. If a problem exists in Cook Inlet related to pink salmon, the proposal should specifically address those problems and not attempt to provide a blanket policy that applies to all hatcheries and operators throughout the State. Additionally, cost recovery takes place in the terminal area. At that point, all common property fisheries have had access to those fish as they have moved through. It makes sense for the hatchery to have the ability to take cost recovery based on their current needs, upcoming capital needs, and debt structure. For instance, SSRAA was unable to take cost recovery this year due to low returns and the need to take existing fish for brood stock. Given this large financial deficit, they should have the ability to take additional cost recovery in the future to mitigate their substantial operating loss this season. Conversely, if a windfall return takes place, hatcheries may want to balance passing some of that windfall on to fishermen against storing up some reserves for years where returns are poor, allowing them to mitigate fishermen during years of lower returns instead of taking so much cost recovery. As each region and hatchery's needs are different, decisions on how much to take and how much to leave in the water for fishermen should be made at the local level by the hatchery Boards. Hatchery production provides significant benefits to sport fishermen in Ketchikan. Without that production, our seasons would likely be shorter, our catches would certainly be less consistent, and our guests' experience would be diminished. Given that cost recovery plays such an integral part in ensuring the hatchery's continued operation, it is imperative that hatcheries have the ability to manage their cost recovery in ways that makes financial sense to each organization. Sincerely, Russell Thomas  
Alaska Sportfishing Expeditions Ketchikan

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

The cost recovery program as it presently exists is very workable for all user groups of the hatchery fish and has proven to be cost effective and is sustainable for all species of salmon. Don't not change the present program. Thank you.



# Southeast Alaska Fishermen's



PC052  
1 of 1

1008 Fish Creek Rd

Juneau, AK 99801

Email: [seafa@gci.net](mailto:seafa@gci.net)

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

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November 25, 2019

Board of Fish – Lower Cook Inlet Meeting

RE: Proposal 22 – Cap hatchery cost recovery: **OPPOSE**

Dear Chairman Morisky and Board of Fish Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species non-profit membership organization representing our 330+ members involved in salmon, crab, shrimp and longline fisheries of Southeast Alaska and longline in the Gulf.

SEAFA opposes this proposal to cap the number of each species of salmon harvested in cost recovery operations. Cost Recovery allows the hatchery programs to pay for the raising of salmon both operational and capital infrastructure costs. **We oppose this proposal as we don't believe that the Board of Fish has the authority to act on this proposal.** ADF&G in staff comments (RC2) states this proposal would “. . . override the department's decision to permit this hatchery operation, an action counter to legal guidance provided the board.”

We are writing in on this and other proposals due to the threat and precedence action on these proposals would have on the hatchery system statewide.

Sincerely,

Kathy Hansen  
Executive Director





*Southern SE Regional Aquaculture Association*

*14 Birch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348*

---

November 25, 2019

Alaska Board of Fisheries  
Mr. Reed Morisky, Chair

*By Electronic Copy Only: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)*

Re: Opposition to Proposal #22

Dear Chair Morisky and members of the Board of Fisheries,

Southern Southeast Regional Aquaculture Association (hereafter "SSRAA") is a regional non-profit salmon hatchery organization formed under state and federal law in 1976. SSRAA, along with the State's other regional hatchery associations and similar private non-profit salmon hatcheries, have a substantial interest in proposal #22.

To begin, we assert that the subject of this proposal is properly within the delegated regulatory authority of the Alaska Department of Fish and Game rather than the Board of Fisheries. The Department has direct and nearly comprehensive responsibility for the hatchery program under the applicable statutes. They have operated with this understanding for many years, as have the hatchery organizations.

Regarding the substance of proposal #22, it seeks to artificially regulate a business process – revenue – that each hatchery organization must individually decide upon on a real-time basis according to highly dynamic events throughout the year. The fact of the matter is that every one of the hatchery organizations prioritizes fishing opportunity for ALL users far above gaining surplus cost recovery, and to suggest otherwise shows a complete lack of understanding and knowledge of this system – and frankly, of nonprofit, mission-oriented business processes in general.

SSRAA is primarily funded through a combination of revenues from cost recovery of adult salmon returns and a 3% ex-vessel tax on landed salmon within its operating area. Among other smaller revenue sources, SSRAA also receives funding from ADF&G's Division of Sport Fish to provide releases of Chinook salmon for Ketchikan, Wrangell, and Petersburg area fisheries.

From 2013 to 2017, the cumulative wholesale value of SSRAA salmon was \$239 million, including \$49 million derived from sales of cost recovery salmon and \$190 million from



common property salmon. This is the level of cost recovery, along with the 3% tax and the other smaller sources of income, that are required to support SSRAA programs. No more and no less. To cap or regulate the amount of necessary revenue that an organization can receive is to invite financial insolvency of that organization.

The nearly 80% of value that was provided to the commercial fleets when compared to the roughly 20% cost recovery portion does not even account for any sport, personal use, subsistence or other harvesters of SSRAA salmon. The numbers of fish in these categories is also substantial, with sport fishermen alone in SSRAA's area harvesting an yearly average of 3,150 Chinook and 28,150 coho salmon over the same 5-year time period.

The Alaska salmon hatchery community has worked for five decades to craft a well-functioning system that has robust regulatory oversight and a common understanding of what it takes to lead the world in sustainable, environmentally friendly salmon culture practices. Hatchery staff work closely with boards of directors to limit the need for cost recovery to only what is absolutely necessary for each organization. Again, enhanced salmon harvest by fishermen is prioritized, not given to disproportionate cost recovery.

Please reject Proposal #22. To do otherwise would put all of Alaska's salmon hatchery organizations in great financial jeopardy.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Landis', written over a horizontal line.

David Landis  
SSRAA General Manager



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

November 25, 2019

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

**RE: Proposal 22 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

**UFA opposes BOF Proposal 22. This proposal addresses all Private Nonprofit Salmon Hatcheries statewide. Alaska's salmon hatchery program is well regulated and has operated successfully for over 30 years. Additional regulations limiting the ability of hatchery programs to self-fund are not needed.**

The legislature enacted statutes to permit private non-profit corporations to operate State hatcheries, with no cost to the State of Alaska, under the oversight of Alaska Department of Fish and Game (ADF&G). All operators work within Regional Salmon Plans, Hatchery Basic Management Plans and annual management plans that guide the hatchery programs. Regional Salmon Plans and Basic Management Plans are developed through Regional Planning Teams (RPT) which is a well-established public process.

Funding for Alaska's Private Nonprofit Salmon Hatcheries is primarily achieved through licensing a portion of returning salmon (cost recovery). Other funding sources may include state loans, periodic state and federal grants, and in some regions a self-assessed salmon enhancement tax (2-3%) paid by the commercial salmon fishermen of the region. Funding is not specific to the needs of a single facility but for many projects throughout each organization.

Proposal 22 cites operations by the Cook Inlet Aquaculture Association (CIAA). CIAA engages in hatchery management as well as habitat protection and other fishery enhancement activities that contribute to common property fishery harvests. These other activities which include cooperative projects that support ADF&G management are funded through hatchery cost recovery operations.



CIAA has taken on the task of bringing two facilities on-line at once. We recognize supporting other enhancement activities while a hatchery program is under development requires a larger percentage of returning fish for cost recovery. As hatchery projects mature cost recovery will diminish and common property contributions will increase.

UFA opposes proposal 22.

Respectfully,

Matt Alward  
President

Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

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

# UNITED SOUTHEAST ALASKA GILLNETTERS



PC055  
1 of 3

Box 2196, Petersburg AK 99833 \* (253) 279-0707 \* [usag.alaska@gmail.com](mailto:usag.alaska@gmail.com) \* [akgillnet.org](http://akgillnet.org)

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

November 19, 2019

## Board of Fisheries

### Opposition to Proposal 22

Dear Mr. Morisky and Board of Fisheries Members-

United Southeast Alaska Gillnetters are **opposed** to Proposal 22, which would cap by species, hatchery fish available for cost recovery purposes.

Cost recovery is a vital element to the production of hatchery fish. Operational costs for hatcheries include a labor force, capitol improvements, and deferred maintenance. These costs can only be covered through cost recovery. Loans taken from the revolving loan fund can only be paid back with a revenue stream. Proponents of this proposal show a poor understanding of the scope of operations and the positive economic impact of these PNP's to the regions they're in.

Cost recovery fish are subject to the same market conditions as common property fish. In poor price years, more fish will need to be taken to meet revenue goals. In good price years, less fish is taken, allowing more common property harvest. Capping the amount of fish available for CR could precipitate a financial catastrophe for a PNP in a poor price year. This could result in deferral of loans, cuts in production, and higher CR harvests in years of a good price, which would result in less common property fish. Proponents of this proposal show a poor understanding of the variability of salmon markets.

The board members of PNP's are made up of fishermen and various other seats. All these board members understand the CR/CP ratio ideal and work toward that to the best that circumstances will allow. They also understand that the PNP has to be fiscally sound to operate to its goals of producing CP fish. We also think that the majority of people who



serve and who have served on these boards are and would be opposed to this proposal after having dealt with the challenge of budgeting for these PNP's. Proponents of this proposal have a poor understanding of how PNP boards work, and how hard these board members work to get as much common property fish as they possibly responsibly can.

In the event of a larger than anticipated return, having a cap on CR could result in a significant increase in straying. We believe flexibility in harvest strategies is important to harvest these fish in a timely manner.

We ask that you reject Proposal 22. We feel it would severely compromise the ability of hatcheries to provide common property fish that are such an economic benefit to coastal communities and the state of Alaska.

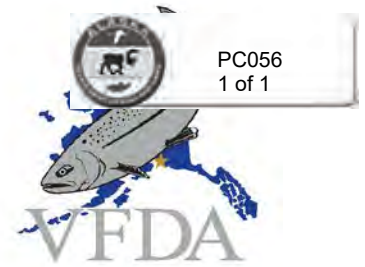
Sincerely,

A handwritten signature in black ink, appearing to read 'Max Worhatch'.

Max Worhatch, Executive Director, United Southeast Alaska Gillnetters



VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.  
SOLOMON GULCH HATCHERY



P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686  
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com

November 18, 2019

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

via email:

**Proposal #22 Opposed - Limit the number of each salmon species harvested in cost recovery fisheries....**

Chairman Morisky, Members of the Alaska Board of Fisheries,

**The Valdez Fisheries Development Assoc. Inc., (VFDA) opposes Proposal #22 because this proposal would impact all private nonprofit salmon hatcheries statewide.**

This proposal, which seeks to cap or numerically limit the number of each salmon species harvested in cost recovery fisheries is yet another attempt to limit hatchery production. Like other emergency petitions and ACR's the board has rejected in recent years, this proposal asserts the same unsubstantiated concerns over ocean carrying capacity and straying in its request for board action. We consider this proposal also to be outside of the board's authority. Hatchery permitting, including the type and number of species propagated, and the overall evaluation of a hatcheries performance lies within the authority of the Commissioner of ADF&G as provided in *AS 16.10.430*.

*AS 16.10.450* provides for the harvest of corporate escapement for cost recovery and brood stock purposes. Hatchery needs are given specific priority in fisheries management for the preservation and perpetuation of hatchery programs. Common property fisheries are generally conducted on fish surplus to those needs. Guidelines for contributions to the common property are provided to gauge the overall benefit of a hatchery program over time. However, many factors including marine survival, program costs for other enhancement activities and repayment of hatchery loans to the Alaska Dept. of Commerce as required in *AS 16.10.505* may reduce these contributions from time to time.

Hatchery production and corporate escapement needs should first be taken up with an association's board of directors and/or the Regional Planning Team, a public process designed to address such concerns. The board of fisheries, having no fiduciary responsibility for the financial obligations of a hatchery association to the state is not the proper venue for such debates.

Proposal 22 would significantly alter a longstanding, statewide structure by which sport, commercial and personal use fisheries, the hatchery associations and their lending institutions depend on for the success of these important fishery enhancement programs. Please reject Proposal #22.

Sincerely

Mike H. Wells  
Executive Director



## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I fully support this proposal. It is evident that large numbers of Prince William Sound reared Pink Salmon are returning to streams and rivers that are not natal or they did not originate from. This could in fact affect the production those streams Salmon.

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I agree and support Proposal 22 100%. The background given by the proposer is a valid assessment of how hatcheries have evolved far beyond their original intended purpose, becoming businesses that now compete with commercial and sport fishermen instead of creating opportunities for more common property fishing. I suggest a 50/50 split between cost recovery and common property fishing. I further suggest the BOF incorporate language designating that all cost recovery fishing be managed by fish-ticket. In other words, 50% of the catch in a cost recovery area is designated as cost recovery and the other 50% catch kept by the fisherman as common property. A percentage of any other type is too unpredictable because estimated returns vary tremendously from actual returns and the numbers could be manipulated to defeat the purpose of the split. In 2010 the Board of Fish granted Cook Inlet Aquaculture a limited economic emergency relief measure to allow CIAA to take 100% of all reds returning to Resurrection Bay. Nine years later CIAA is STILL taking virtually 100% of the run and is additionally attempting to keep sport fisherman from catching any early run reds in Resurrection Bay. This, as noted by the proposer, does not serve the public or provide a common property fishery - it is in fact, fish farming.



Appendix F6.—Estimated historical harvest contributions and total runs of pink salmon to greater Cook Inlet hatchery release sites, 1978–2015.

Return year	Brood year	Fry release	Hatchery contribution to the CCPF	Hatchery contribution cost recovery	Hatchery contribution broodstock esc.	Hatchery donated	Total hatchery run	Estimated marine survival
1978	1976	318,280			3,700		3,700	1.16%
1979	1977	4,820,937			369,000		369,000	7.65%
1980	1978	9,243,717			315,000		315,000	3.41%
1981	1979	6,795,244	963,350		47,279		1,010,629	14.87%
1982	1980	10,268,753	181,400		4,400		185,800	1.81%
1983	1981	15,475,435	577,200				577,200	3.73%
1984	1982	15,232,750	230,000				230,000	1.51%
1985	1983	18,142,463	463,600				463,600	2.56%
1986	1984	23,818,500	380,135	55	50		380,240	1.60%
1987	1985	26,265,176	84,500				84,500	0.32%
1988	1986	8,278,967	836,000				836,000	10.10%
1989	1987	15,589,360	877,600				877,600	5.63%
1990	1988	36,977,190	167,400				167,400	0.45%
1991	1989	36,974,370	204,800				204,800	0.55%
1992	1990	30,602,576	97,577	276,000	69,000		442,577	1.45%
1993	1991	33,760,487	228,376	409,431	102,000		739,807	2.19%
1994	1992	48,700,000	604,037	959,064	153,966		1,717,067	3.53%
1995	1993	62,395,000	1,210,572	1,213,322	182,348		2,606,242	4.18%
1996	1994	63,358,000	19,510	423,306	140,152		582,968	0.92%
1997	1995	111,469,975	172,262	2,465,108	188,197		2,825,567	2.53%
1998	1996	89,918,000	507,850	787,538	175,468		1,470,856	1.64%
1999	1997	90,000,000	222,228	857,902	151,903		1,232,033	1.37%
2000	1998	64,797,691	8,580	1,043,705	269,808		1,322,093	2.04%
2001	1999	66,287,812	108,735	421,530	198,148		728,413	1.10%
2002	2000	126,635,207	9,791	1,041,529	252,777		1,304,097	1.03%
2003	2001	105,971,985	2,924	616,155	261,457	590	881,126	0.83%
2004	2002	125,167,000	1,523	2,459,189	117,222		2,577,934	2.06%
2005	2003	84,247,031	4,779	2,138,538	84,088		2,227,405	2.64%
2006	2004	26,567,983	5,000	246,781	27,741		279,522	1.05%
2007	2005	13,883,682		112,801			112,801	0.81%
2008	2006	13,282,049						

-continued-



Appendix F6--Page 2 of 2.

Return year	Brood year	Fry release	Hatchery contribution to the CCPF <sup>b</sup>	Hatchery contribution cost recovery	Hatchery contribution broodstock esc.	Hatchery donated	Total hatchery return	Estimated marine survival
2009	2007	0	0	0	0		0	
2010	2008	0	0	0	0		0	
2011	2009	0	0	0	0		0	
2012	2010	0	0	0	0		0	
2013	2011	11,246,399	0	48,017	143,884	0	191,901	1.71%
2014	2012	18,603,000	0	32	28,739	0	28,771	0.15%
2015	2013	51,298,000	0	2,087,024	165,008	0	2,252,032	4.39%
2016	2014	14,474,300						

Note: Harvest estimates of hatchery fish are from CIAA (2015 a and b). CCPF = Commercial Common Property Fleet.

**Please consider PROPOSAL 22 and PROPOSAL 23 comments pertaining to cost recovery for both. I fully support both! We have problems here!**

**PROPOSAL 22 -SUPPORT**

**5 AAC 40.XXX.** Private Nonprofit Salmon Hatcheries.

Limit the number of each salmon species harvested in cost recovery fisheries,

**PROPOSAL 23 - SUPPORT**

'Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity. **5**

**AAC 40.005.** General.

The Tutka CIAA has persistently taken an excessive high percentage of Cost recovery (85%) while not providing substantial public benefits for the fisheries, nor self-perpetuating stocks, its mission. **This is not in the best interest of the**

**public, Production of this magnitude for little benefit, abuses wild pastures and jeopardizing natural stocks.”<sup>1</sup>**

Excessive cost recovery is taken even when in full production so please don't be duped by “we are rebuilding “the run.

1. There is a definite specified condition of 50% maximum level of salmon taken for cost recovery that a hatchery may harvest. I have listed the goals and objectives below.
2. The Tutka Lagoon hatchery Permit 32 and BMP specifies this with its attached Basic Management Plan BMP addendum lists this as a condition.
3. BMPs (Basic Management Plans) as stated in regulation is an addendum to the permit and must be followed at all times<sup>2</sup>.

(a) A hatchery operator shall manage the hatchery and its salmon returns in accordance with a basic management plan approved by the commissioner.  
(see below)

**PLEASE NOTE:** The Department is attempting to confuse you with Table 22 -1 Cost Recovery Table. This table does not apply to Proposal 22 for Tutka Hatchery Permit #32 and BMP addendum. This table applies to a business Plan of a Corporation that builds hunting cabins at the Paint River, gives extravagant severance pay, just put carpeting in its headquarters and illegally uses thousands of dollars of cost recovery money for Public Relations schemes and lawyers' fees bullying the park for permits.

Without the Common Property numbers this table is useless. The business Plans of CIAA are not the priority nor the reason for PROPOSAL 22 and PROPOSAL 23. The fisherman are the reason any of this hatchery boondoggle exists. Each hatchery has its unique harvest allocations and conditions that must be met by “operating efficiently” not wasting money. CIAA is spending money like drunken sailors...

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<sup>1</sup> AS 16.10.400.(g)

<sup>2</sup> **5 AAC 40.820.** Basic management plans



Inaccuracies unwittingly spoken from the public is one thing because we are lay people, not paid, and trying to communicate. Inaccuracies spoken or written by the department to deceive is unacceptable and this must cease and the public is left helpless save the judicial. Please let's get to the bottom of these hatchery problems without resorting to the judicial.

1. Was there ever a public hearing? Where? When? Who attended?
2. A public hearing is not the same as an Regional Planning team meeting.
3. The Regional Planning teams is not the same as the department and never should be considered so.
4. "A public hearing shall be held in a central location in the vicinity of the proposed hatchery facility"<sup>3</sup> is not the same as the corporate CIAA building 100 miles away.
5. The process followed for creation of BMP's needs to be evaluated for consistency with law.
6. If sharing fish with common property fisherman at 50/50 allocated percentage means "hatcheries not being able to achieve cost recovery goals to fund annual operations, this means the hatchery does not "operate efficiently" so that **at least 1/2 of the fish** are harvestable by common property fisheries. the gist of the clause under Objectives 1.3 (below).
7. "If surplus hatchery are fish going unharvested and spawning in the wild" then the fisherman obviously don't need this excess and the number of eggs taken should be reduced to "operate efficiently" a constitutional mandate.<sup>4</sup>
8. "Private non-profit hatchery association boards set their cost recovery goal annually, based on business needs". The fisherman have business needs and are the reason the "**Tutka program exists**"<sup>5</sup> . Maybe the problem is that CIAA, the RPT and the ADFG has forgotten this?
9. "Regional aquaculture associations (RAAs) receive revenue from the salmon enhancement tax (SET)." 92% and millions of dollars of these SETs have come from the Upper Cook Inlet fleet yet these hatcheries are all in LCI because the CIAA board is dominated by LCI seiners.
- 10.X vessel value of each of the LCI fleet has been over \$200,000 but there are only 18-20 of them. The majority of this value if from wild fish not hatchery fish. When is enough enough?
- 11.It is interesting to note is that just last year, four of the CIAA board members,

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<sup>3</sup> AS 16.10.410. Hearings Before Permit Issuance.

<sup>4</sup> Article VIII Sec 15

<sup>5</sup> Tutka Lagoon Hatchery Permit and BMP addendum

who are also the cost recovery harvesters for CIAA, as well as a voting Cook Inlet Regional Planning team member, got caught on camera poaching 16 tons or 32,000 pounds of wild run chum salmon up in Koyuktolik Bay Lagoon. Five lower Cook Inlet seine boats were involved. Is this who ADFG is trying to save?

12. “Private nonprofit salmon hatcheries are regulated through statute, administrative code, and permit terms.” But they do not always follow these laws. As seen in the 2009 ADFG Internal Review.”

13. “Proposed changes to a permit are reviewed by area, regional, and statewide department staff and additionally may be reviewed by the appropriate Regional Planning Team with recommendations given to the commissioner.

***After this review, the Board of Fisheries may amend by regulation these proposed and reviewed terms of the permit as mandated in 16.40.440 (b) There is no statute giving the amending process of the permit terms by regulation to anyone but the Board .***

***14. The attorney General opinion on Board Authority 1997 requires scrutiny. To continue to reiterate an opinion, does not mean it’s always accurate<sup>6</sup>***

## **WHAT IS THE AUTHORITY OF THE BOARD OF FISHERIES**

### **AS 16.10.440. (b)** Regulations Relating to Released Fish.

After the issuance of a permit by the commissioner, the Board of Fisheries may amend by regulation the terms of the permit relating to:

1. the source of salmon eggs
2. the number of salmon eggs,
3. the harvest of fish by hatchery operators,
4. the specific locations designated by the department for harvest.

### **AS 16.10.455 (b)** Cost Recovery Fisheries

The Board of Fisheries may adopt regulations under AS [16.05.251](#) regarding a fisheries management plan governing operations under this subsection in a terminal harvest area, including allocation plans.

### **5 AAC 40.005. (a); (b); (c);** General

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<sup>6</sup> 661-98-0127

(a) The harvest of salmon inhabiting the water of the state, regardless of whether the salmon are naturally or artificially propagated, may be conducted **only pursuant to regulations adopted by the Board of Fisheries.**

(b) The harvest of salmon returning to a private nonprofit salmon hatchery **will be governed by regulations adopted by the Board of Fisheries. The board will, in its discretion, develop harvesting regulations** after review of the harvest plans or other materials, information, and testimony, if any, presented by the regional associations, hatchery operators, the Department of Commerce, Community, and Economic Development, the Department of Fish and Game, fishermen, and other interested parties.

(c) Where hatchery returns enter a segregated location near the release site and can be harvested without significantly affecting wild stocks, a special harvest area **may be designated by regulation adopted by the board,** within the hatchery permit, or by emergency orders issued by the commissioner.

Conditions stated in original Permit and Basic Management Plan (BMP) addendum <sup>7</sup>, calls for 2/3<sup>rd</sup> allotted to common property, 1/3 for CIAA.<sup>8</sup>

**January 5<sup>th</sup> 1994**, commissioner Carl L. Rosier approved, signed, and “issued”<sup>9</sup> the private nonprofit (PNP) hatchery permit number 32 and Basic Management Plan (BMP) for the Tutka Lagoon Hatchery.

The Tutka Lagoon Hatchery was permitted to incubate, rear, and release production from up to 125 million pink and chum salmon eggs in accordance with the conditions and stipulations contained in this letter, the permit, and the BMP.<sup>10</sup>

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<sup>7</sup> 5 AAC 40.820. Basic management plans

<sup>8</sup> Jan 5,1994 Tutka Lagoon Hatchery Permit no. 32 with BMP addendum

<sup>9</sup> AS 16.10.400 (g)

<sup>10</sup> 5 AAC 40.820. Basic management plans -“describe the conditions under which the permit will be implemented, and is an addendum to the permit.” “A hatchery operator shall manage the hatchery and its salmon returns in accordance with a basic management plan approved by the commissioner.”



Permit condition # 3: The Basic Management Plan is a condition of the permit and must be followed and adhered to at all times.

**1994 - 1.2 Goals** The Tutka program exists to make up to 5 million adult pink salmon available to common property fisheries each year.

**2012- 1.2 Goals** the Tutka program exists to make additional adult pink salmon and up to 66 thousand adult sockeye salmon available to common property fisheries for harvest in LCI each year

**1994 1.3 Objectives** ... experience returns of 5 million adults, produce revenues from harvest and sale of returning fish that are at least equal to costs of hatchery operation and operate efficiently<sup>11</sup>so that at least 2/3 of the fish are harvestable by common property fisheries.

**2012 1.3 Objectives:** ... experience returns of 5 million adult pink salmon and 66 thousand adult sockeye salmon, produce revenues from harvest and sale of returning fish that are at least equal to costs of hatchery operation, and operate efficiently so that at least 1/2 of the fish are harvestable by common property fisheries.

To receive an even higher percentage of cost recovery, **On June 13, 2012** Tutka Lagoon Hatchery Addendum to Permit no 32 Basic Management Plan was **“amended by the hatchery operator and the department.”**<sup>12</sup> to receive a 50/50 split in 2012.<sup>13</sup>

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<sup>11</sup> Article VIII Sec 15

<sup>12</sup> **TUTKA BAY LAGOON HATCHERY BASIC MANAGEMENT PLAN (as amended through June 12, 2012)**

<sup>13</sup> **June 13, 2012 Tutka Lagoon Hatchery Addendum to Permit no 32 BMP**

Still, even at 50% , this condition was realized only once or twice during full production under the 1994 Permit and BMP.

“Sockeye salmon smolt production is limited by Upper Cook Inlet (UCI) fisheries management concerns. Maximum 660 thousand sockeye salmon eggs may be incubated each year in order to produce up to 330 thousand smolt.” For the Tutka Lagoon Release.

**Where did this 66,000 return come from?** This is unrealistic with this limitation.

### **WHAT ARE THE CURRENT REGULATIONS AND PERMIT CONDITIONS?**

There is a specified condition of 50% maximum level of salmon taken for cost recovery that a hatchery may harvest. The Tutka Lagoon hatchery Permit 32 with its attached Basic Management Plan BMP addendum lists this as a condition.

#### **5 AAC 40.820.** Basic management plans

(a) A hatchery **operator shall manage the hatchery and its salmon returns in accordance with a basic management plan approved by the commissioner.**

Before **the public hearing** held under 5 AAC 40.210 on the proposed hatchery, department staff, in conjunction with the applicant, shall develop a draft basic management plan that includes a facility development schedule of no more than five years. Department staff and the applicant shall **present the draft basic management plan** and facility development schedule **at the public hearing** and shall make copies available for public review and comment at the hearing.

(b) If, **following the public hearing**, the commissioner decides to issue a permit for the proposed hatchery, department staff shall finalize the basic management plan and facility development schedule after all comments have been considered. The final basic management plan, which includes a facility development schedule, describes the conditions under which the permit will be implemented, and is an addendum to the permit.

### **I AM NOT AWARE OF A SEPARATE PUBLIC HEARING FOR THE PUBLICS REVIEW OF THE 2012 BMP WAS IT ASSUMED THE RPT MEETING WOULD SUFFICE?**

#### **5 AAC 40.210.** Public hearing

(a) **The department will conduct a public hearing** on each completed permit



application. **The commissioner will give notice of public hearing** at any time after acceptance of an application. The notice will be given at least 25 days before a public hearing, and the notice will, in the commissioner's discretion, be given before the completion of the draft basic management plan. The hearing will be held under the following sequential procedures:

(1) **the commissioner will make an introductory statement;**

(2) the applicant shall make a presentation of the proposed hatchery plans, describing its location, incubation plans, the capacity of the facility, the donor stock source, and other relevant facts that may be of interest to the department or the public;

(3) **the department will present the draft of the basic management plan** for the proposed facility, including a presentation on fish culture aspects, production considerations, and a presentation of the management section of the basic management plan by the local commercial fisheries and sport fisheries area management biologist; and

(4) **the commissioner will open the floor for public testimony** and questions on all aspects of the proposed facility.

(b) **The department will respond in writing within 10 working days to any specific objections offered by a member of the public at the hearing.**

(c) **The department will accept written comments for 15 days after the hearing, and will respond in writing, within 10 working days after receipt, to any specific objections received within that time.** The public hearing process concludes 15 days after the oral hearing is held.

#### **Original Tutka Permit and BMP 1994**

**The hatchery shall be operated in accordance with (1) AS 16.10.400-480; (2) regulations promulgated by the Department of Fish and Game and the Alaska Board of Fisheries affecting private nonprofit hatcheries (including those adopted after issuance of this permit); and (3) the Alaska Department of Fish and Game Statement of Policy on Permitting Nonprofit Salmon Hatcheries in Alaska, dated October 3, 1974.**

**Specific conditions that must be met** in the operation of this hatchery are described below, attached in conditions 1 through



12, **and included in the Basic Management Plan** for Tutka Bay Lagoon Hatchery. **If the permittee fails to comply with the terms and conditions of this permit within a reasonable period of time after notification of noncompliance, the permit will be suspended or revoked.**

1. The hatchery will be operated in accordance with all statutes and regulations governing fish and game resources of the State of Alaska. Violation of any such statute or regulation by the hatchery operator will constitute grounds for suspension or revocation of the hatchery permit.
  2. The Basic Management Plan is a condition of the permit and must be followed and adhered to at all times.
12. This permit is subject to annual review and amendment by ADF&G, as prescribed by the ADF&G Policy on Permitting Nonprofit Salmon Hatcheries in Alaska. Continuation of the permit is contingent upon correction of any aspects of the hatchery's operation that fail to meet the terms of the permit. If the operation of the hatchery is found to be not in the best interest of the public, the Commissioner may alter the terms and conditions of the permit to mitigate the adverse effects. If the adverse effects are deemed by ADF&G to be irreversible and cannot be sufficiently mitigated, termination of operations shall be initiated by ADF&G. During the period of termination, not to exceed four years, the permittee may harvest hatchery produced fish under the terms of the permit, but may not release additional fish.
13. Negligence or incompetence in egg take, incubation, or rearing and release procedures will constitute sufficient grounds for limiting use of donor stocks. Continued negligence or incompetence, or violation of state fish and game statutes or regulations may result in permit revocation.

### 3.0 BROODSTOCK CONSIDERATIONS

#### 3.1 Development Schedule

Approximately **63 million eggs will be collected initially**. Given past hatchery performance, 63 million eggs should yield 50 million fry at maximum production from the facility as currently configured. As rearing capacity of the release sites becomes more clearly defined, as additional release sites are developed and as land and water use permits are obtained, egg collections may increase to 125 million.

Initially 42,000 females and at least 14,000 males will be required for pink salmon broodstock. At maximum production 84,000 females and 28,000 males will be required.

Without adequate rearing capacity why do they keep this arbitrary high permitted capacity of 125,000,000?

## RE: PROPOSAL 22 Limit the number of each salmon species harvested in cost recovery fisheries

I agree with putting a cap on each species. It should be no more than 50% for any and all release sites. I do not think a numerical limit is a very good way to estimate any percent. Normally the prediction numbers are usually higher than the actual return. The only way to accurately get any percentage is to regulate it by fish ticket. When a fisherman enters into a cost recovery area then that percentage is taken from his fish ticket. For example if the percentage is 50% for his share, the other 50% would go to cost recovery.

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

I am opposed to hatcheries in the Kachemak Bay State Park, which by statute and Management Plan is a Scenic Park.; "(1) "Scenic Park" means relatively spacious areas of outstanding natural significance, where major values are in their natural geological, faunal or floral characteristics, the purpose of which is directed primarily toward the preservation of its outstanding natural features and where development is minimal and only for the purpose of making the areas available for public enjoyment in a manner consistent with the preservation of the natural values such as camping, picnicking, sightseeing, nature study, hiking, riding and related activities which involve no major modification of the land, forests or waters, and without extensive introduction of artificial features or forms of recreational development that are primarily of urban character; (Alaska Statute 41.21.990)." Hatcheries do not fit these requirements, specifically "preservation of natural values ... which involve no major modification of the land, forests, or waters". -I have hiked on the trails and streams of Tutka Bay, and there are obnoxious quantities of dead spawned out pink salmon. -The smell is horrible, and in some places there are so many carcasses that you can not find sand for firm footing. -Net pens crammed with 10's of millions of fry have no place in the scenic park. - When these 10's of millions of fry are released, they compete with natural species such as clams, shrimp, and wild salmon which used to have commercially viable runs. -After egg takes, thousands of carcasses have been dumped in Tutka Bay, with little research or respect for the natural park environment. -If a hatchery can support itself, please find a different home in a village or bay where it is welcome and NOT in a public scenic park. -Or forget the hatchery and let the shellfish, halibut, and wild salmon compete in a natural environment.

**RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity**

I am opposed to this proposal because there is no evidence that hatchery operations contaminate the lagoon.



## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

Chairman Morisky and members of the Alaska Board of Fish: I oppose this proposal. The author makes inaccurate and baseless claims not supported by science, observation, or legislation. It has been demonstrated that 125mm eggs (resulting in approx. 100mm fry) can, and do thrive in the environs of Tutka Bay Lagoon when managed properly. Techniques have been developed to eliminate low DO (dissolved oxygen) periods in the Lagoon, for instance. CIAA is thoroughly monitored and regulated (frequent inspections and audits as well as the RPT process), and asks permission, through the established (public) permitting process before "expanding" out of the Lagoon (in a very limited and seasonal manner). This is hardly "strong-arming". I grew up with close ties to one of the lead authors of the Kachemak Bay State Park. I've conferred with him more than once on related issues and he's made it clear that the hatchery and commercial fishing were very much intended to occur in, and co-exist with the Park. As for value to the community and economy at large, fishermen of all gear types including personal use are allowed to avail themselves of the production from this facility, and all fish caught, from personal use to Cost Recovery, help feed an ever growing population. Thank you.

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

Revoking or further limiting the already permitted capacity of the hatchery will lead to failure of the long time established and capital invested success of the hatchery. The sockeye salmon is a large part of the sport and personal use success utilized by the public. Many people don't realize that the sockeye come from the TBH and that fishery will disappear if there is continued efforts to limit or close the hatchery. There is no financial support from any sport fish sector for these sockeye.



November 21, 2019

**Board of Fisheries****Proposal 23 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is a non-profit corporation founded in 1976 to provide and protect the salmon resource in Area H. We produce hatchery-born, ocean-raised salmon for the common property fishery in Cook Inlet and the outer Kenai Peninsula. Maintaining and improving salmon habitat and natural salmon populations is also an important part of CIAA's work. We recognize the value of both hatchery and naturally produced salmon fisheries.

Private nonprofit salmon hatchery programs in Alaska are governed by several policies, plans, and regulations. To assure compliance, the Alaska Department of Fish and Game (ADF&G) conducts rotational hatchery evaluations that include a review of hatchery management plans, permits and an assessment of a hatchery program's consistency with statewide policies with recommendations to address any deficiencies found. The findings of the last evaluation of Tutka Bay Lagoon Hatchery (TBLH), ADF&G, Regional Information Report No. 5J12-05 – April 2012, found the operation consistent with statewide policies and prescribed management practices. The most recent hatchery inspection report performed by ADF&G Fish Pathology Section was completed in July 2019 with favorable findings and one recommendation for filtration that has already been identified and highlighted as a capital project. In addition, ADF&G and CIAA biologists work cooperatively on stream surveys to enumerate returns and assess straying.

The capacity of TBLH has not changed since CIAA assumed operations in 1993 and no additional capacity for this facility has been requested.

Proponent referenced conflict and CIAA attempting to force multiple agencies to comply with our operational plan. Management authority was considered and specifically referenced in 1991 with a letter of intent regarding the operation of the State-owned facility operating within Kachemak Bay State Park. Since 1978 the hatchery has operated under ILMA 200098 issued by Alaska Department of Natural Resources. Alaska salmon hatcheries are highly regulated, CIAA and TBLH are in compliance.

There is no evidence to support the suggestion that Tutka Bay Lagoon is heavily contaminated. TBLH continues to successfully rear fry in the lagoon year after year. CIAA and ADF&G has demonstrated the lagoon can successfully rear more than 20 million fry. We use multiple release and rearing strategies. Loading densities are established in cooperation with ADF&G biologists and other hatchery scientists. Fish culture best practices, along with numerous variables are part of the consideration given to determine physical capacities. Annual loading densities are identified in the TBLH Annual Management Plan (AMP).

*Salmon enhancement today means better salmon fishing tomorrow.*



Alaska Salmon Hatchery and Enhancement Regulation 5 AAC 40.340 establishes the responsibility of the Regional Planning Team (RPT) to consider the needs of all user groups and ensures the public has the opportunity to participate. A thorough review takes place by the RPT before any recommendations are submitted to the ADF&G Commissioner for consideration and potential approval.

Respectfully,

A handwritten signature in black ink that reads "Dean Day".

Dean Day  
Executive Director

*Salmon enhancement today means better salmon fishing tomorrow.*

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

KPFA opposes proposal 23. The author's allegation that hatchery operations contaminate the lagoon as suggested in this proposal is false. Tutka Bay Lagoon Hatchery continues to successfully rear fry in the lagoon year after year with evidence of contamination.



November 22, 2019

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

Dear Chairman Morisky and members of the Board of Fisheries,

KRAA opposes proposal 23 which asks the Board to suspend, revoke or alter the Tutka Bay Hatchery permit. We encourage the Board to reject this proposal because oversight and permitting for hatcheries properly lies with the Commissioner of the Alaska Department of Fish & Game (ADF&G). Although I will briefly address some of the more troubling assertions of Proposal 23, these observations are properly considered by the Commissioner and the Department and should not be viewed as relevant to whether or not the Alaska Board of Fisheries has authority for permitting and oversight of Alaska's hatcheries.

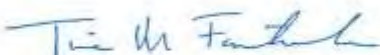
Proposal 23 contends that the Tutka Bay Hatchery is currently permitted in excess of its capacity and that the Tutka Bay Lagoon Hatchery permitting process that established the current permitted capacity was arbitrary. Apart from the general allegation regarding excess permitted capacity, the proposer does not provide evidence that would support this contention. In fact, though the hatchery has not always operated at its permitted capacity, there are years in which it has done so, providing evidence that the hatchery does, indeed, have sufficient resources with which to operate successfully at capacity. Further, ADF&G did not express concerns that the Tutka Bay Lagoon Hatchery may have insufficient resources available to obtain permitted production goals during the established review process.

The author of Proposal 23 further contends that the permitting process failed to consider the management authority of the land on which the hatchery site is located. Land ownership has not changed since the Tutka Bay Lagoon Hatchery was initially built and permitted for operation within Kachemak Bay State Park (1976), nor has it changed since being permitted at its current capacity in 1993 when Cook Inlet Aquaculture Association assumed operation of the facility. Tutka Bay Lagoon Hatchery, from its outset, was envisioned as a state-owned facility operated within the boundaries of the Park through IMLA 200098 (est.1978). Consideration of intent and operations, as well as management authority, is covered by that agreement between ADF&G and the Department of Natural Resources (DNR). The operational agreement between CIAA and ADF&G for Tutka Bay Lagoon Hatchery honors that agreement (ADF&G RIR No.5J12-05; April, 2012).

Hatchery facilities generate Annual Management plans and provide Annual Reports to ADF&G on a yearly basis. The details of all hatchery operations, anticipated and actual, are provided in these documents and are subject to ADF&G oversight and approval. Failure to operate within the parameters of the hatchery permit or operational

agreement can result in suspension or revocation of a permit. The Department has raised no such issues with regard to operation of Tutka Bay Lagoon Hatchery or their operational contract with CIAA.

In closing I would once again emphasize that the State of Alaska's hatchery programs are highly regulated and governed by a host of State agencies and by multiple divisions within those agencies. The Annual Regional Planning Team meetings provide public process and opportunity to speak to issues related to hatchery programs and operations. Those who participate in that process but do not find satisfaction are free to seek other remedies. The Board of Fisheries is limited regarding hatchery oversight. Consequently, stakeholder appeals regarding the Regional Planning Team process should be made to the Commissioner.



Executive Director

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

I am an area H pure seine permit holder and oppose this proposal. As a board member of Cook Inlet Aquaculture Association as Cook Inlet Seiners Association I support and refer to their comments.



November 25, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 23**

Dear Chairman Morisky and Board of Fisheries members,

I am a Homer resident and commercial salmon fisherman and I oppose proposal 23. We have raised and supported our family commercial salmon fishing and the Tutka Bay Lagoon Hatchery (TBLH) is a part of that. The TBLH also supports the China Poot personal use dip net fishery that has helped feed our family.

Proposal 23 if enacted would in effect remove Cook Inlet Aquaculture Association's ability to financially support itself or produce fish available for common property fisheries. The Tutka Bay Lagoon Hatchery is permitted for 125,000,000 eggs and reducing it by 84% would render that hatchery inoperable. If you consider that on average about 80% of eggs survive to fry and of the fry released into the ocean around 3% return as adults that leaves a potential return of 480,000 fish if all conditions are perfect. That amount of fish at a 3 pound per fish average and at the 2019 value of pink salmon of \$.30 per pounds the total value produced with ideal conditions would be \$432,000.00. If Cook Inlet Aquaculture Association (CIAA) took all of the returning fish for cost recovery that amount does not come close to covering the operating costs of just the Tutka Bay Lagoon Hatchery, not to mention the numerous other CIAA projects that cost recovery from TBLH supports.

CIAA has many projects that benefit not just commercial fishermen but personal use, sport and subsistence users as well. The large sockeye and silver salmon sport fisheries in Resurrection Bay, the China Poot personal use dip net fishery, as well as many projects to remove invasive species such as

elodea and pike. These projects that greatly benefit the Alaskan public are supported in part by cost recovery harvests at the Tutka Bay Lagoon Hatchery. If the egg take permit was reduced by 84% not only would Tutka Bay hatchery not be financially viable, the rest of these projects would not be as well.

I would also like to note that in 2012 the department of Fish and Game along with the regional plan team reviewed the Tutka bay Lagoon Hatchery operations and performance as they relate to the permit and found that CIAA was operating the TBLH in accordance with their permit. If Fish and Game thought there were any violations occurring they have every right to review the hatchery operations at any time.

In closing I would like to encourage you to keep the permit for the Tutka Bay Lagoon Hatchery as it's written to allow CIAA to operate and oppose proposal 23.

Sincerely,

Matthew Alward

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

Reducing the permitted capacity or suspending Tutka Bay hatchery permit would harm me as a commercial fisherman in Lower Cook Inlet. The current permitted egg capacity is based on a number of factors that are planned reviewed and permitted through proper scientific and biological research.

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

Dear Chairman Morisky and Alaska Board of Fisheries Members: PWSAC opposes Proposals 23. The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization employing 45 full time staff members and 75 seasonal workers and a budget exceeding \$14 million annually which is funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and many thousands more stakeholders who benefit from PWSAC production, including: commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists and salmon processors. PWSAC is OPPOSED to Proposal 23, which seeks to suspend, revoke or alter the Tutka Bay hatchery permit to reduce capacity. We believe that the Alaska Board of Fisheries lacks the statutory authority to take the action as requested by the Proposers. The Alaskan Legislature invested the Alaska Department of Fish and Game with the legal duty to oversee all aspects of hatchery creation, operation, and production, whereas the Board is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve. As part of the Department's oversight of hatchery production, there is an intricate and public system of annual hatchery plans that are reviewed annually by the department. These Annual Management Plans (AMPs) are reviewed and discussed in public forums known as Regional Planning Teams (RPTs), which address how hatchery operators conduct their cost recovery harvests at each hatchery and address other specifics of hatchery operations. The Department and the Board have respected and abided by these processes and this division of labor for over 30 years, and we request that this relationship continues. Please reject Proposal 23. Sincerely, Tommy Sheridan General Manager/CEO Prince William Sound Aquaculture Corporation

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

There is no evidence to support the conclusions reached by those who wish to reduce the capacity of the Tutka Bay Hatchery. Fry are successfully reared rear after year in the Lagoon and the disappearance of crab and other species has several reasons, one of them being the overabundance of sea otters that are eating themselves out of habitat and food. This is a problem throughout the Bay as evidenced by year around residents of Halibut Cove. To blame it on the hatchery is a false assumption and should not be a reason for damaging the capacity of the hatchery. Also those who wish to limit or completely close the hatchery are themselves interested in commercial businesses in the Park. Thank you.



# Southeast Alaska Fishermen's



PC073  
1 of 1

1008 Fish Creek Rd

Juneau, AK 99801

Email: [seafa@gci.net](mailto:seafa@gci.net)

Phone: 907-586-6652

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

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November 25, 2019

Board of Fish – Lower Cook Inlet Meeting

RE: Proposal 23 –Alter Tutka Bay Hatchery permit: **OPPOSE**

Dear Chairman Morisky and Board of Fish Members,

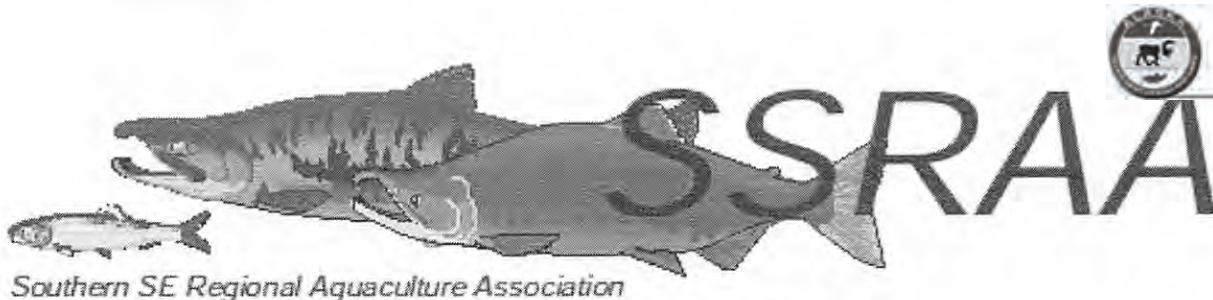
Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species non-profit membership organization representing our 330+ members involved in salmon, crab, shrimp and longline fisheries of Southeast Alaska and longline in the Gulf.

SEAFA opposes this proposal to suspend, revoke or alter the Tutka Bay hatchery permit. The Board of Fish does not have the authority to suspend, revoke or alter hatchery permits. That authority is held by the Commissioner of ADF&G with a public process through the RPT.

We are writing in on this and other proposals due to the threat and precedence action on these proposals would have on the hatchery system statewide.

Sincerely,

Kathy Hansen  
Executive Director



*Southern SE Regional Aquaculture Association*

*14 Borch Street, Ketchikan, AK 99901; Phone: 907-225-9605; FAX 907-225-1348*

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November 25, 2019

Alaska Board of Fisheries  
Mr. Reed Morisky, Chair

*By Electronic Copy Only: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)*

Re: Opposition to Proposals #23, #24, #25, #26 and #27

Dear Chair Morisky and members of the Board of Fisheries,

Southern Southeast Regional Aquaculture Association (hereafter "SSRAA") is a regional non-profit salmon hatchery organization formed under state and federal law in 1976. SSRAA, along with the State's other regional hatchery associations and similar private non-profit salmon hatcheries, have a substantial interest in these proposals.

For those readers who may not be familiar: These proposals, along with Proposal #22, are the latest in a long series of attempts by disgruntled residents of the Kachemak Bay area to hamstring and handicap CIAA, particularly at the Tutka Bay Hatchery.

The authors of these proposals have put forward multiple emergency petitions, ACRs and Board Proposals, as well as using the public and administrative processes of the DNR, DEC, MCS (Marine Stewardship Council) and others to prevent the lawful and well-regulated activities of the Alaska hatchery programs.

In repeatedly bringing forward meritless iterations of these proposals and similar actions, the proposers have blatantly abused the remarkably inclusive and democratic processes of the Board of Fisheries and caused undue hardship and expense for all concerned.

Please reject Proposals #23, #24, #25, #26 and #27.

Thank you for your consideration of these comments.

Sincerely,

David Landis, SSRAA General Manager



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

November 25, 2019

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

**RE: Proposal 23 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

**UFA opposes BOF Proposal 23. This proposal requests the Board of Fisheries “suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity.” Alaska’s salmon hatchery operating permits are developed and managed in cooperation with the Alaska Department of Fish and Game in an open process that considers many factors. There is no basis to limit the maximum permitted capacity for this facility.**

Private nonprofit salmon hatchery programs in Alaska are governed by several policies, plans, and regulations. Tutka Bay Lagoon Hatchery (TBLH) is a State facility operated by the Cook Inlet Aquaculture Association (CIAA) through a contractual agreement with the Alaska Department of Fish and Game (ADF&G).

A hatchery's physical capacity is established in cooperation with ADF&G biologists and other hatchery scientists. Fish culture best practices, along with numerous variables are part of the consideration given to determine the physical or permitted capacity. Annual loading densities, which may be less than a hatchery's permitted capacity, are identified each year in the hatchery's Annual Management Plan.

Alaska Salmon Hatchery and Enhancement Regulation 5 AAC 40.340 establish the responsibility of the Regional Planning Team (RPT) to consider the needs of all user groups and ensure the public has the opportunity to participate. The Cook Inlet RPT meets twice each year. A thorough review of hatchery operations takes place by the RPT before any permit recommendations are submitted to the Commissioner for consideration and potential approval.

To assure compliance with Alaska's hatchery operation requirements, ADF&G conducts rotational hatchery evaluations that include a review of a hatchery's management plans and permits and consistency with statewide policies. In ADF&G's most recent rotational evaluation<sup>1</sup>, operation of TBLH was reported to be consistent with statewide hatchery policies and prescribed management practices.





The Alaska Department of Fish and Game also conducts regular inspections of each hatchery. Favorable findings were reported by ADF&G in the regular hatchery inspection conducted by the Fish Pathology section in July 2019. ADF&G Fish Pathology made a recommendation for additional filtration to remove more sediment from the hatchery's water supply during storm events and the hatchery operator has responded responsibly by identifying additional filtration as a capital project.

In addition, ADF&G and hatchery biologists work cooperatively to enumerate returns, evaluate straying, and assess fish health during rearing.

The proposal references conflict and the hatchery operator attempting to force multiple agencies to comply with its operational plan that has "morphed into an industrial capacity incessantly expanding cost recovery salmon ranch designed for revenue." The capacity of TBLH has not changed since the hatchery operator, the Cook Inlet Aquaculture Association, assumed operation of the facility in 1993 nor has operator requested additional capacity for this facility for any reason.

The proposal states the hatchery operator "failed to consider the management authority on the land the hatchery occupies." Management authority was considered and specifically referenced in 1991 with a letter of intent regarding the operation of the state owned facility operating within Kachemak Bay State Park. Since 1978 the hatchery has operated under ILMA 200098 issued by Alaska Department of Natural Resources.

The proposal claims the physical capacity of TBLH is 80 million eggs, but provides no basis for this claim. Based on reviews by ADF&G and other hatchery biologists, the physical capacity of TBLH is 125 million eggs.

The proposal requests the permitted capacity of TBLH be set at "20 million to fit the carrying capacity of this lagoon." The proposal also claims hatchery operations have contaminated the lagoon. There is no evidence to support a heavily contaminated lagoon as suggested and the hatchery operator, utilizing multiple release and rearing strategies, has demonstrated more than 20 million fry (*the life stage is not identified in the proposal, we assume the life stage is fry*), can successfully be reared in the lagoon. In 2018 the hatchery reared and released 518,000 sockeye salmon smolt and 50,000,000 pink salmon fry.

UFA opposes proposal 23 and asks the BOF not support this proposal.

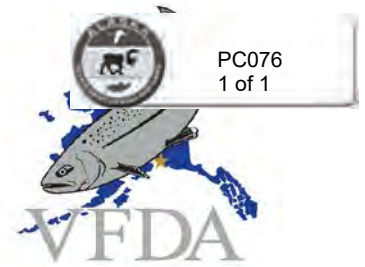
Respectfully,

Matt Alward  
President

Frances H. Leach  
Executive Director

<sup>1</sup> ADF&G, *Regional Information Report No. 5J12-05 – April 2012*

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.  
SOLOMON GULCH HATCHERY



P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686  
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com

November 18, 2019

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
[dfq.bof.comments@alaska.gov](mailto:dfq.bof.comments@alaska.gov)

via email:

**Proposal #23 Opposed – Suspend, revoke or alter the Tutka Bay hatchery permit to reduce capacity....**

Chairman Morisky, Members of the Alaska Board of Fisheries,

**The Valdez Fisheries Development Assoc. Inc., (VFDA) opposes Proposal #23.**

This proposal seeks to have the board of fisheries suspend, revoke or alter an approved hatchery permit for a facility operated by the Cook Inlet Aquaculture Association in Tutka Bay Lagoon. The proposer asserts concerns with the carrying capacity and unsubstantiated impacts of hatchery operations to the environment, as well as conflicts with state parkland regulation to justify this request to amend or deny an established hatchery permit.

The request that the board of fisheries suspend, revoke or alter the Tutka Bay hatchery permit and lower permitted capacity to 20 million green pink salmon eggs is in direct conflict with *AS 16.10.440(b)*. Like other emergency petitions and ACR's the board has rejected in recent years, this desired action would also be outside of the board's authority. Hatchery permitting, including the type and number of species propagated, and the overall evaluation of a hatcheries performance lies within the authority of the Commissioner of ADF&G as provided in *AS 16.10.430*.

For these reasons, we ask the board to please reject Proposal #23.

Sincerely

Mike H. Wells  
Executive Director

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

Hatcheries alter the natural cycle of wild salmon, competing for food in the ocean and returning to their natal streams. Hatchery fish are an unwelcome guest who crashed a dinner party. Wild salmon should be an unthreatened priority, allowed to breed and eat in peace. Thanks you.



**From:** [Kevin Walker](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#); [Feige, Corri A \(DNR\)](#); [Gease, Ricky John \(DNR\)](#)  
**Subject:** \*\*\* NO HATCHERIES IN KACHEMAK BAY STATE PARK AND CRITICAL HABITAT AREA  
**Date:** Monday, November 25, 2019 8:15:24 AM

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I am opposed to hatcheries in the Kachemak Bay State Park, which by statute and Management Plan is a Scenic Park;

*"(1) "Scenic Park" means relatively spacious areas of outstanding natural significance, where major values are in their natural geological, faunal or floral characteristics, the purpose of which is directed primarily toward the preservation of its outstanding natural features and where development is minimal and only for the purpose of making the areas available for public enjoyment in a manner consistent with the **preservation of the natural values** such as camping, picnicking, sightseeing, nature study, hiking, riding and related activities **which involve no major modification of the land, forests or waters**, and without extensive introduction of artificial features or forms of recreational development that are primarily of urban character; (Alaska Statute 41.21.990)."*

Hatcheries do not fit these requirements, specifically "preservation of natural values ... which involve no major modification of the land, forests, or waters".

- I have hiked on the trails and streams of Tutka Bay, and there are obnoxious quantities of dead spawned out pink salmon.
- The smell is horrible, and in some places there are so many carcasses that you can not find sand for firm footing.
- Net pens crammed with 10's of millions of fry have no place in the scenic park.
- When these 10's of millions of fry are released, they compete with natural species such as clams, shrimp, and wild salmon which used to have commercially viable runs.
- After egg takes, thousands of carcasses have been dumped in Tutka Bay, with little research or respect for the natural park environment.
  
- If a hatchery can support itself, please find a different home in a



village or bay where it is welcome and NOT in a public scenic park.  
-Or forget the hatchery and let the shellfish, halibut, and wild salmon compete in a natural environment.

Kevin Walker  
59975 Golden Plover Avenue  
Kachemak City, AK 99603

## RE: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity

I agree with the entirety of the proposal, especially the history of CIAA's failed efforts and poor management and the assessment of CIAA as an overreaching industrial hatchery that ignores both the public, the environment, established hatchery practices and sound business practices. The Tutka Bay hatchery should be closed. CIAA has been given multiple exclusive-use waivers, in Tutka and Resurrection Bay, and continually fails to turn them into viable efforts. Instead, each is an unsuccessful bungle, requiring yet another waiver. The cycle needs to end now.

## **PROPOSAL 23 SUPPORT**

**5 AAC 40.005. General.** Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity,

**PROPOSED BY:** Jeff Lee

Even CIAA itself has admitted this carrying capacity has been exceeded:

*“Recognizing this limitation to the lagoon, CIAA and ADF&G have determined that the best solution is to limit the number of fish that return to the lagoon. This can be done by transferring and rearing only enough fry (20 million) in the lagoon such that the adult returns are sufficient for broodstock and cost recovery.<sup>1</sup>”*

Where is the notification from the department?

The capacity of the FRED Division ADFG incubation facility in 1976 was 10,000,000 egg capacity.

The arbitrary number of eggs in the 1994 CIAA permit exploded up to 125,000,000 capacity with very little open public process, no research, no biological basis, no forethought, and no understanding on what the carrying capacity of Tutka Lagoon could endure. Not one moment was spent considering impact in the surrounding ecosystems supporting shellfish and herring in these designated nursery habitats. especially with the stress of warming water temperatures.

Expansion into Park waters is not an option. The pollution already caused to the Lagoon is not allowed to be transferred to a pristine site! Three Alaska State Park Directors and eight years of Park Board members have denied expansion of this enormous footprint into a pristine area already fully allocated.

Kachemak Bay is a Crab and shrimp nursery. This area was particularly chosen because of this productivity as Kachemak Bay State Park, State Critical Habitat Area, National Estuarine Reserve, NOAA Habitat Focus Area

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<sup>1</sup> Smolt Issue 75 Spring/summer 2015

This is the wrong place for a production facility with the prime purpose for cost recovery to pay down debt, This is illegal Exclusive use and is prohibited.

There is no room for CIAA to expand yet CIAA continues to bully the park wasting valuable time, money, and energy strong arming park authorities and the park board to break the law in a constitutional Special Purpose Site.

Attempting to mimic PWS, will not work in this area that is 25 times smaller and located in a silled fjord with deep glacial depressions known for poor circulation due to stratification. CIAA has been caught throwing 600,000 pounds of carcasses in these deep depressions, then asked for a permit which has also been denied as it causes hypoxia.

This Site, a State Park and Critical Habitat Area is reserved from the public domain for the people of the state of Alaska with tens of thousands of visitors contributing increasing revenue to the state in expenditures, fees and taxes.

Why have commissioners not issued a notice of noncompliance? The Tutka hatchery has been operated by CIAA for 28 years and the fisherman have averaged 15% of the fish in that time frame. During this time fisherman are continually being told a future promise while CIAA runs it \$6,000,000 annual budget taking loans totaling \$17,000,000.

Permit No 32 Tutka Lagoon Hatchery has 12 conditions

#12. Continuation of the permit is contingent upon correction of any aspects of the hatchery's operation that fail to meet the terms of the permit.

**If the operation of the hatchery is found to be not in the best interest of the public, the Commissioner may alter the terms and conditions of the permit to mitigate the adverse effects.**



## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

I am opposed to proposal 24. It only hinders any needed cost recovery.

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

Chairman Morisky and members of the Alaska Board of Fish: I oppose this proposal. The author is mistaken when he writes that the Special Harvest Area (any SHA) creates an "exclusive use" zone or area. The only activity "excluded" by an SHA is commercial salmon fishing. Even in this sense, the Dept. can (and does) allow commercial fishing by EO when conditions warrant. Notice that this in no way impedes or restricts public access or activity (in Kachemak State Park, in this instance). The primary purpose and utility of an SHA is to simplify and expedite Dept. management of salmon fishing in a given area. Yes, this is in coordination with the associated salmon hatchery (Cook Inlet Aquaculture Association, in this case), but the authority resides with the Dept.. Not the hatchery. In short, the author's concerns are unfounded, and his request is unnecessary and inappropriate. Thank you.

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

Please oppose the proposal. This would limit TBH and CIAA to recover costs for operating TBH and other lower and upper CI projects. This area is critical for the cost recovery and common property fisheries related to TBH.



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November 21, 2019

## Board of Fisheries

### Proposal 24 - Opposition

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is a non-profit corporation founded in 1976 to provide and protect the salmon resource in Area H. We produce hatchery-born, ocean-raised salmon for the common property fishery in Cook Inlet and the outer Kenai Peninsula. Maintaining and improving salmon habitat and natural salmon populations is also an important part of CIAA's work. We recognize the value of both hatchery and naturally produced salmon fisheries.

Tutka Bay Lagoon Hatchery (TBLH) is a State-owned facility operated by CIAA and currently under project development. Significant recent investments in infrastructure are part of the project development planning process and the basis for receiving funds from the Department of Commerce, Community, and Economic Development loan program. Elimination of the TBLH Special Harvest Area (SHA) significantly reduces CIAA's ability to provide for operational funds through the cost recovery process as set out in AS16.10.455 and will negatively impact CIAA's ability to pay for loans in which the issuance of monies was based on future cost recovery efforts. CIAA spends \$3.5 million on enhancement programs throughout Cook Inlet, but there are only five active sites that have opportunities for cost recovery harvest. TBLH was specifically resurrected in 2011 to increase CIAA's contribution to common property fisheries and create economic stability for the organization

The Alaska Department of Fish and Game (ADF&G) and CIAA actively manage this harvest area. The area is managed to meet ADF&G department escapement goals (SEG) along with CIAA's broodstock and harvest goals.

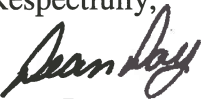
Escapement goals must be achieved prior to broodstock collection and cost recovery harvest. As the return matures CIAA coordinates with ADF&G for the commencement of cost recovery and common property harvests within the SHA. ADF&G biologists actively manage the SHA with the ability to open up common property areas within the SHA when CIAA goals can be projected, are being met, and/or harvest issues arise.

Access to the SHA is only limited to the commercial common property fishery during the time where cost recovery efforts are underway. This is a common practice at all PNP hatcheries throughout the state. As previously stated, harvest management is an active process. As cost recovery and return goals are achieved the area is opened up to allow access to the commercial fishery. All remaining stakeholders (subsistence, sport, personal use) are allowed access to waters within the SHA during cost recovery or

*Salmon enhancement today means better salmon fishing tomorrow.*

common property fisheries. Similar to Bristol Bay wild fisheries and Prince William Sound pink fisheries, it can be congested but pleasure boats or shoreline fishing is not precluded.

Respectfully,



Dean Day  
Executive Director

*Salmon enhancement today means better salmon fishing tomorrow.*

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

KPFA opposes proposal 24. Elimination of the Tutka Bay Lagoon Special Harvest Area (SHA) significantly reduces Cook Inlet Aquaculture Association's ability to provide for operational funds through the cost recovery process. Without Tutka Bay Hatchery, CIAA would not have the funding to produce pink salmon or release sockeye salmon at the facility, which are widely harvested in the region by all user groups.



November 23, 2019

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

Dear Chairman Morisky and members of the Board of Fisheries,

KRAA opposes proposal 24 which asks the Board to remove the Tutka Bay Lagoon Hatchery (TBLH) Special Harvest Area (SHA). We encourage the Board to reject this proposal because it is a proposal to, indirectly, close the Tutka Bay Lagoon Hatchery. Hatchery "special harvest" areas are essential for aquaculture associations to harvest returning salmon which pay for the hatcheries' operations. Without the TBLH special harvest area, there is little or no probability that other cost recovery activities will produce the revenue needed to both fund Cook Inlet Aquaculture Association's (CIAA) other programs and to continue TBLH operations. The other likely outcome is that enhanced fish are likely to go unharvested or stray.

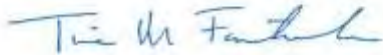
Excepting financial impacts, this proposal would not alter Tutka Bay Lagoon Hatchery's permitted programs or planned releases. The hatchery could still operate, but the implementation of Proposal 24 would remove CIAA's ability to assure that returning fish are harvested. Special Harvest Areas are established in regulation for the purpose of harvesting enhanced returns. Aquaculture associations are not granted standard commercial fishing permits and are authorized only for permitted cost recovery fisheries within an SHA. The associations are further obligated to assure that, to the best of their ability, enhanced fish are fully utilized and straying opportunity is minimal. Without an SHA at Tutka Bay Lagoon Hatchery, ADF&G managers and the aquaculture association would become severely hampered in their ability to meet their obligation of full utilization of enhanced fish.

Proposal 24 asserts that the existence of the SHA removes open access use in Tutka Bay. Although open access to all user groups is a Kachemak Bay State Park policy, the SHA does NOT create exclusive use. First, noncommercial users are able to access salmon in the special harvest area – both while harvests are occurring and before and after special harvests. Second, commercial harvesters by collectively voting to create a regional Aquaculture Association have, in effect, given a proxy for their access for a limited time and a limited amount of salmon to the Aquaculture Association. An individual commercial harvester's desire to access the SHA and his or her inability to do so does NOT constitute exclusive use. Exclusive use would only occur if an entire class of users was totally, for the entire year, excluded from the SHA.

In summary, the Tutka Bay hatchery is legally permitted with the current Special Harvest Area. The hatchery undergoes annual review through the Regional Planning Team process and operates under the

Comprehensive Salmon Plan as well as Annual Management Plans. Whether or not a hatchery should exist is a question for the Department of Fish and Game. Proposal 24 is essentially a back-door way to try to have the Alaska Board of Fisheries to attempt to address this question.

We encourage you to reject this proposal and thank you for the opportunity to comment.



Executive Director



## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

I am an area H purse seine permit holder and oppose this proposal. As a permit holder I support the Tutka Bay Lagoon Hatchery both financially and in principle. As a fishermen who relies on the common property fishery I understand the need for a special harvest area in Tutka Bay and am happy to forgo fishing to allow cost recovery. I would venture to guess that no permit holders would support this as we understand the fishery in that area is provided by the hatchery and the special harvest area is essential to it's success. I personally question the motive behind this proposal.

November 16, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 24**

Dear Chairman Morisky and Board of Fisheries members,

I am a Homer resident and commercial salmon fishermen and I oppose proposal 24.

Proposal 24 would remove the special harvest area (SHA) for the Tutka Bay Lagoon Hatchery (TBLH). A vital part of private nonprofit hatchery operations is the ability to self-fund through the take of hatchery produced fish in cost recovery operations. Essential to cost recovery operations is a set location to take the fish called a special harvest area. The Tutka Bay Lagoon SHA was set into regulation to provide a location for the cost recovery efforts of the TBLH. Prior to the SHA being established in regulation the department of fish and game every year set up the same area as a SHA through an emergency order which is what led to the departments proposal creating the Tutka bay Lagoon SHA. If the board adopted proposal 24 the department would have no choice but to set up a special harvest area for the take of cost recovery fish from the TBLH through an emergency order.

The author claims that an SHA removes open access for exclusive use in Tutka Bay which is inconsistent with the Kachemak Bay State Park rules. The department has the authority to open any special harvest area to common property fisheries and in fact, has opened the Tutka Bay Lagoon SHA to common property fisheries many times in the past. There are no rules that forbid sport fishing in a special

harvest area and the SHA is often open to common property fishing, therefore the Tutka Bay Lagoon SHA does not create an exclusive use area.

I ask that you keep the Tutka Bay Lagoon SHA intact and oppose proposal 24.

Sincerely,

Matthew Alward

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

The Tutka Lagoon Special Harvest area is needed to pay for and operate Tutka Bay Lagoon Hatchery. The operation of the hatchery has been an approved activity in the Park since the Park was established.

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

Dear Chairman Morisky and Alaska Board of Fisheries Members: PWSAC opposes Proposal 24. The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization employing 45 full time staff members and 75 seasonal workers and a budget exceeding \$14 million annually which is funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and many thousands more stakeholders who benefit from PWSAC production, including: commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists and salmon processors. PWSAC is OPPOSED to Proposal 24, which seeks to eliminate the Tutka Bay Lagoon Special Harvest Area. We believe that the Alaska Board of Fisheries lacks the statutory authority to take the action as requested by the Proposers. The Alaskan Legislature invested the Alaska Department of Fish and Game with the legal duty to oversee all aspects of hatchery creation, operation, and production, whereas the Board is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve. As part of the Department's oversight of hatchery production, there is an intricate and public system of annual hatchery plans that are reviewed annually by the department. These Annual Management Plans (AMPs) are reviewed and discussed in public forums known as Regional Planning Teams (RPTs), which address how hatchery operators conduct their cost recovery harvests at each hatchery and address other specifics of hatchery operations. The Department and the Board have respected and abided by these processes and this division of labor for over 30 years, and we request that this relationship continues. Please reject Proposal 24. Sincerely, Tommy Sheridan General Manager/CEO Prince William Sound Aquaculture Corporation

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

The Tutka Bay Lagoon Special Harvest Area is productive for all pink and red salmon user groups and should not be eliminated. The needs of all user groups of salmon is expanding and therefore adding more salmon to the mix for all of those groups is important. I oppose this proposal and encourage continued productivity for the people of Alaska at this area. Thank you.



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

November 25, 2019

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

**RE: Proposal 24 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

**UFA opposes BOF Proposal 24. This proposal requests the Board of Fisheries "to remove the Tutka Bay Special Harvest Area." The Tutka Bay Special Harvest Area was established in regulation through the Board's public process and is managed in cooperation with the Alaska Department of Fish and Game through an open process that considers many factors. There is no basis to remove the Tutka Bay Special Harvest Area.**

Private nonprofit salmon hatchery programs in Alaska are governed by several policies, plans, and regulations. Tutka Bay Lagoon Hatchery (TBLH) is a State facility operated by the Cook Inlet Aquaculture Association (CIAA) through a contractual agreement with the Alaska Department of Fish and Game (ADF&G). Funding for hatchery operations are secured primarily through regulated harvests in the designated Special Harvest Area (SHA).

The TBLH SHA is actively managed for approximately six weeks each year by ADF&G in cooperation with the hatchery operator. The area is managed to 1) meet ADF&G department escapement goals, 2) meet the hatchery's broodstock goal, and 3) to achieve the hatchery operator's cost recovery financial goal. This is an active process in which the commercial fishery is managed to achieve ADF&G's and the hatchery operator's goals. Sport fisheries and other active users of the SHA are not restricted from the SHA.

Tutka Bay Lagoon Hatchery has been operated by CIAA since 1993. Operations were temporarily suspended from 2003 through 2010 due to low salmon prices. Salmon prices improved and in 2011 the facility was re-opened. It is currently under project development. Significant recent investments in infrastructure are part of the project development process and the basis for loan funds from the Alaska Department of Commerce, Community and Economic Development's revolving loan program.

Elimination of the SHA will reduce the operator's ability to secure funds through the cost recovery process as set out in AS16.10.455. This will negatively impact the ability to operate the facility, complete current and future infrastructure improvements, and conduct other salmon rehabilitation and enhancement efforts.

Access to the TBLH SHA is only limited to the commercial common property fishery during the time cost recovery efforts are underway and it is common practice for portions of the SHA to be open to common property during a cost recovery as it is a dynamic process.

UFA opposes proposal 24 and asks the BOF not support this proposal.

Respectfully,



Matt Alward  
President



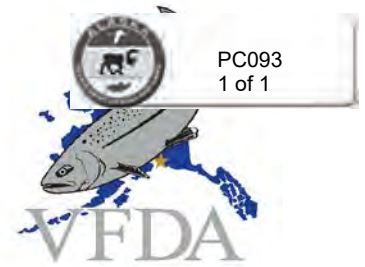
Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

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



VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.  
SOLOMON GULCH HATCHERY



P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686  
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com

November 18, 2019

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
[dfq.bof.comments@alaska.gov](mailto:dfq.bof.comments@alaska.gov)

via email:

**Proposal #24 Opposed – Eliminate the Tutka Bay Lagoon Special Harvest Area....**

Chairman Morisky, Members of the Alaska Board of Fisheries,

**The Valdez Fisheries Development Assoc. Inc., (VFDA) opposes Proposal #24.**

This proposal, seeks to eliminate a vital and necessary special harvest area used by the Cook Inlet Aquaculture Association at Tutka Bay Lagoon for the harvest of hatchery pink salmon for cost recovery and brood stock collection.

The proposer states several concerns, such as wanton waste and straying of hatchery pink salmon to area streams as a justification to eliminate this terminal harvest area. However, these perceived conditions would be greatly exacerbated by the elimination of the Tutka Bay Lagoon SHA, which is necessary to harvest hatchery stocks while reducing impacts to natural returns and provide protection for brood stock needs.

We suggest the concerns raised by the proposer, which are largely in-season management issues, would be best addressed with the department and through the Regional Planning Team process before the board takes such drastic action to eliminate a hatchery special harvest area. Please reject Proposal #24.

Sincerely



Mike H. Wells  
Executive Director



**From:** [Dave Seaman](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Date:** Monday, November 25, 2019 8:28:46 AM

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Dave Seaman here, Little Tutka Bay resident, regarding Tutka Hatchery: would like to see it closed, let the lagoon (a wonderful park attribute) go back to it's natural state. Ciaa is running it like a private fiefdom. There is always the need for more cost recovery, less need for the common property fishery. Too many other uses for the blooming biomass of Tutka Bay. Who wants all those humpies around displacing our natural runs and fish cycles? Not me! Give it back to the Park!

Dave Seaman

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

An SHA is exclusive use. The SHA in Tutka Bay does not align with park law. A special harvest area SHA is exclusive use and this is forbidden in park waters, and does not align with park law. Ultimately, unless this is properly addressed, the natural progression of this conflict will cause this to end up in the court system. A permit is required for any commercial activity other than commercial fishing. Commercial Hatchery operations are not commercial fishing so require a park permit to ensure compliance with park law. SHA's are an exclusive use and not allowed within the Park ADFG and the hatchery proponents that have entered into ADFG positions need to understand that park waters are not the same as public domain waters and respect this difference. CIAA has of the rest of Cook Inlet to exploit, and has been with limited success from the common property perspective, which supposedly is the reason for CIAA's existence. including Port Graham where they also have a facility. But No SHA's in the Park. The Tutka Pink Salmon artificial high production facility has been and always will be in the wrong location. Thank you. Jeffrey

## RE: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area

I agree and recommend an amendment to the language. I concur because of the mismanagement of the cost recovery process by CIAA. At this time CIAA cost recovery is "granted" to a few \*select\* permit holders, creating a monopoly instead of an opportunity and excluding the majority of the seiners. This results in an inefficient harvest and unfair opportunity to a select handful of seiners. ALL COST RECOVERY SHOULD BE OPEN TO ALL PERMIT HOLDERS. Cost Recovery should be capped at 50% catch for cost recovery and 50% common property, which will motivate all active permit holders to pursue the fishery instead of designating it to just a few boats who may or may not be in a position to fish in a timely manner. Additionally, cost recovery fishing should be managed by fish-ticket: 50% of the catch in a cost recovery area should be designated as cost recovery and the other 50% catch kept by the fisherman as common property.

## **PROPOSAL 24 SUPPORT**

### **5 AAC 21.372. Tutka Bay Lagoon Salmon Hatchery Management Plan.**

**Eliminate the Tutka Bay Lagoon Special Harvest Area** because it is located in Kachemak Bay State Park with unique statutory and regulatory authority that is different from ADFGs directives so this SHA is invalid .

This bay needs open access fishing because is being overrun by harvestable surplus of hatchery fish because of the Tutka Hatchery as well as the inter-regional straying from PWS . Tutka needs to be open to fisherman to be able to intercept the glut of hatchery fish that get by the cost recovery harvesters pretty much every year and stray into wild park portfolio streams suffocating them and degrading their diversity with maladapted genetics.

The Lagoon is a mess of putrid unharvested not spawned dead dying carcasses beginning in September on into October. This is a disgrace and it is due unregulated broodstock collection afraid they won't get enough so the Hatchery tries to glut itself with adult salmon to get the arbitrary number of 125,000,000 which has exceeded its carrying capacity in the hatchery in the lagoon and in the bay eggs. Cost recovery is also inefficient and orderly. Fish get by them by the tens of thousands only to glut the streams so you need ice cleats to walk over the top of them.

Does this sound like the statutes mandates of the park (below). It is ridiculous.

Four fisherman and five LCI seine boats, of the CIAA cost recovery fleet were busted by fish and wildlife protection poaching 16 tons of chum salmon last year in Koyuktoik , These people are also on the CIAA Board of Directors and the Regional Planning team. Since it was figured through fish tickets that this wasn't the first time they have been poaching it is no wonder they also weren't available to keep fish cleaned out of Tutka Bay SHA so it stands exposed and vulnerable to stray Tutka PWS and Port Graham hatchery fish

Management Authority of Kachemak Bay State Park is administered as per the constitution, by Alaska Division of Parks and Outdoor Recreation, a Division of Alaska Department of Natural Resources.

The Tutka Bay Lagoon SHA as well as Halibut Cove and most of the land and water in between is located within Kachemak Bay State parks land and water boundaries a Legislatively Designated Area (LDA) with its own set of statutes and regulations that it shall follow. To formalize these distinctions in Kachemak Bay, because it overlaps another jurisdiction, the Kachemak Bay Critical Habitat Area, ADFG and ADNR signed a cooperative agreement in 1989 to line out these differences for better understanding and cooperation.

**“Nothing herein is intended to conflict with federal, state, or local laws or regulations. If there are conflicts, the laws and regulations shall prevail.”<sup>1</sup>**

**WHAT ARE THE CURRENT ADNR STATUTES?** An SHA placed within Park boundaries by using chapter ADFG’s 21 is not recognized because commercial activities like commercial aquaculture activities, is not commercial fishing, so it requires a park permit be submitted A park permit is required for any enhancement activity within Park Boundaries.

11 AAC 12.340(19) "commercial activity" may not be compatible to park mandates. This land and water is reserved from the Public Domain as per the constitution Article VIII sec 7 Special Purpose Sites and the Legislature when they established this Special Purpose Scenic Park.

Added on to this authority is AS 41.21.131. Kachemak Bay State Park  
Established in 1970

**(a)** The presently state-owned land and water, and all that acquired in the future by the state, lying within the parcels described in this section are designated as the Kachemak Bay State Park. In order to protect and preserve this land and water for its unique and exceptional scenic value, the park is established and shall be managed as a scenic park. The land and water lying within the following described parcels is reserved from all uses incompatible with its primary function as a scenic park and is assigned to the department for control, development, and maintenance.

“Department” in Section 41 means Department of Natural Resources not Department of Fish and Game.

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<sup>1</sup> Cooperative Agreement between the ADFG and ADNR 1989

## **AS 41.21.990. Definition of Scenic Park**

**(1)** "scenic park" means relatively spacious areas of outstanding natural significance, where major values are in their natural geological, faunal or floral characteristics, the purpose of which is directed primarily toward the preservation of its outstanding natural features and where development is minimal and only for the purpose of making the areas available for public enjoyment in a manner consistent with the preservation of the natural values such as camping, picnicking, sightseeing, nature study, hiking, riding and related activities which involve no major modification of the land, forests or waters, and without extensive introduction of artificial features or forms of recreational development that are primarily of urban character;

### **WHAT ARE THE CURRENT DPOR REGULATIONS?**

11 AAC 12.340(19) "commercial activity" means the sale of, delivery of, or soliciting to provide, goods, wares, edibles, or services in exchange for valuable consideration through barter, trade, or other commercial means; a service offered in conjunction with another sale of goods, wares, edibles, or services, which service involves the use of state park land or water, is a commercial activity whether or not it is incidental to, advertised with, or specifically offered in the original sale; all guide, outfitter, and transportation services are commercial activities if any payment or valuable consideration through barter, trade, cash, or other commercial means is required, expected, or received beyond the normal and customary equally shared costs for food and fuel for any portion of the stay in the park.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Removal of the SHA would reduce the confusion and intrusion into a jurisdiction not under the authority of ADFG. State Parks require commercial permits for any commercial activity so it can deliberate if activities are incompatible with its mandates.

Removing the regulatory language that defines Tutka Lagoon as a SHA will also remove the serious misunderstanding barrier that state park waters can be closed by a permit and basic management plan (BMP) for the Tutka Bay Lagoon Hatchery using a foreign set of regulations that do not pertain to the park. Any commercial hatchery activities outside of the Lagoon require s a State Park and critical habitat commercial permit.

**RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat**

I am opposed to Proposal 25. This closure is not needed



## RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat

Chairman Morisky and members of the Alaska Board of Fish: I oppose this proposal. This proposal would make it difficult if not impossible to prosecute Cost Recovery in Tutka Bay, and it would close a large area historically available to commercial fishing, but would do little to protect Dungeness or other bottom dwellers. Tutka Bay is a deep fjord. Much too deep for any salmon seine to reach bottom - except at the very head of the bay (and in Tutka Lagoon). The head of the bay is already protected by regulation that prohibits fishing within 500 yards of an anadromous stream (as found at the head of Tutka Bay). This effectively protects the small area of shallow water susceptible to possible harm by salmon seines. Tutka Lagoon is the only other area in Tutka Bay at risk and very little seine activity occurs there, and then only for the purposes of collecting brood stock or cost recovery. It became apparent during Homer AC testimony that the author confused Lat/Longitude positions and only meant to close the head of the bay to commercial fishing. Again, this area is already protected by regulation. No further action is needed to protect the resource(s) of concern. Thank you.

## RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat

Please oppose this proposal. This would severely limit CIAA from conducting any and all the necessary hatchery cost recovery and brood stock harvest of pink and sockeye stocks for hatchery production. It would also limit the ability of common property fishery to harvest excess hatchery fish. The special harvest area is opened and closed and can be an adjusted area by emergency order which has worked well for hatchery and common property use for many years.



November 21, 2019

## Board of Fisheries

### Proposal 25 - Opposition

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is a non-profit corporation founded in 1976 to provide and protect the salmon resource in Area H. We produce hatchery-born, ocean-raised salmon for the common property fishery in Cook Inlet and the outer Kenai Peninsula. Maintaining and improving salmon habitat and natural salmon populations is also an important part of CIAA's work. We recognize the value of both hatchery and naturally produced salmon fisheries.

Tutka Bay Special Harvest Area (SHA), Statistical Area 241-07, is the primary cost recovery location for Tutka Bay Lagoon Hatchery (TBLH) salmon operations. This proposal will close approximately a third of the Tutka Bay SHA to commercial and cost recovery fishing.

Proposal 25 will substantially reduce the ability to harvest all salmon returning to the hatchery because the hatchery is located southeast of the proposed line. In addition, elimination of this area from CIAA's SHA severely impacts CIAA's ability to provide funding for the continuation of operations at TBLH and maintaining other existing enhancement programs within the Lower Cook Inlet (LCI) area. Investments and funding decisions were made with the assumption of being able to source funds from the cost recovery harvest within this SHA.

Tutka Bay Lagoon Hatchery is a State-owned facility operated by CIAA. Recent and significant investments in infrastructure have been made at this location, which is currently under project development. The elimination of this area from an established SHA in Tutka Bay would require an increase in cost recovery efforts in other SHAs within the China Poot Subdistrict specifically Hazel (241-93) and China Poot (241-92). Both areas are a product of salmon fisheries enhancement directly tied to TBLH. We provide these fisheries in China Poot and Hazel lakes through eggs and milt taken at TBLH and then incubated at Trail Lakes Hatchery. The inability to provide for cost recovery will jeopardize both these projects in the future.

The proposer cites protection of Head End Creek and Southern Glacier Creek and lead lines damaging bottom habitat in shallow areas as reasoning for eliminating commercial and cost recovery fisheries in Tutka Bay. These shallow areas can be protected through current Alaska Department of Fish and Game (ADF&G) management authority without closing a large area. Tutka Bay, including the Tutka Bay SHA, is cooperatively managed to target fish returning to the hatchery.

*Salmon enhancement today means better salmon fishing tomorrow.*

The Tutka Bay Subdistrict, including the Tutka Bay SHA, is cooperatively managed to target fish returning to the hatchery. The area is actively managed by regulation or emergency order by ADF&G in consultation with CIAA. This is common practice and good management for Tutka Bay.

Respectfully,



Dean Day  
Executive Director

*Salmon enhancement today means better salmon fishing tomorrow.*

## RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat

The anadromous streams at the head of Tutka Bay are already protected by a 500-yard perimeter from the stream mouth as a no commercial fishing zone unless the Alaska Department of Fish and Game management decides otherwise. Adding additional closed waters to commercial fishing would have significant impact to the local fishery and would likely result in unharvested pink salmon. This would result in lost economic opportunity.

**RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat**

I am an area H purse seine permit holder and oppose this proposal. The closure line in this proposal effectively cuts off most of Tutka Bay to commercial fishing and is impractical.

November 25, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 25**

Dear Chairman Morisky and Board of Fisheries members,

I live in Homer and own a Lower Cook Inlet seine permit and I oppose proposal 25. I've been running my own boat for the last 15 years and have raised my family on the back deck. I believe in protecting important fish habitat but this proposal goes way beyond that.

Proposal 25 would set up a closure line out towards the mouth of Tutka Bay where the water is hundreds of feet deep. The author of this proposal is claiming it is intended to protect the shallow waters at the head of Tutka Bay but the proposed location of the line is miles from the head of the bay. All of the anadromous streams in Tutka Bay already have a 500 yard radius closure around them that protects the shallow waters in front of the streams. The closure around the creek at the head of the bay essentially closes all of the shallow flats in the head of the bay and I believe that the line that proposal 25 would set is arbitrarily placed far from the shallow waters that the author claims need protecting and would close traditional fishing grounds with no additional protections.

I encourage you to look at the line that would be set in this proposal and the authors desire to protect the shallow head waters of Tutka Bay and oppose proposal 25.

Sincerely,

Matthew Alward

**RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat**

This is a traditional fishing area in Tutka Bay since before the Park was established - Commercial fishing and Fish enhancement activities are included in the approved activities for Kachemak Bay State Park.



## RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat

Dear Chairman Morisky and Alaska Board of Fisheries Members: PWSAC opposes Proposal 25. The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization employing 45 full time staff members and 75 seasonal workers and a budget exceeding \$14 million annually which is funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and many thousands more stakeholders who benefit from PWSAC production, including: commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists and salmon processors. PWSAC is OPPOSED to Proposal 25, which seeks to close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat. We believe that the Alaska Board of Fisheries lacks the statutory authority to take the action as requested by the Proposers. The Alaskan Legislature invested the Alaska Department of Fish and Game with the legal duty to oversee all aspects of hatchery creation, operation, and production, whereas the Board is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve. As part of the Department's oversight of hatchery production, there is an intricate and public system of annual hatchery plans that are reviewed annually by the department. These Annual Management Plans (AMPs) are reviewed and discussed in public forums known as Regional Planning Teams (RPTs), which address how hatchery operators conduct their cost recovery harvests at each hatchery and address other specifics of hatchery operations. The Department and the Board have respected and abided by these processes and this division of labor for over 30 years, and we request that this relationship continues. Please reject Proposal 25. Sincerely, Tommy Sheridan General Manager/CEO Prince William Sound Aquaculture Corporation

**RE: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat**

There already exists adequate protection for the head of the Bay with a 500 yard protective barrier in place. There is no need to close these waters. Thank you.



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

November 25, 2019

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

**RE: Proposal 25 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

**UFA opposes BOF Proposal 25. This proposal requests the Board of Fisheries to close a portion of Tutka Bay including approximately a third of the Tutka Bay Lagoon Hatchery Special Harvest Area to commercial and cost recovery fishing. There is no basis to remove this area from historic commercial and cost recovery harvests.**

Proposal 25 will substantially reduce the ability to harvest salmon returning to Tutka Bay and effectively eliminate the ability to complete cost recovery harvests at the Tutka Bay Lagoon Hatchery (TBLH). TBLH and a majority of the cost recovery harvests associated with this facility are located within the proposed closed area. Elimination of this area from the hatchery's established Special Harvest Area (SHA) severely impacts the operator's ability to manage the hatchery returns and provide funding for the continuation of other enhancement programs within the Lower Cook Inlet (LCI) area.

Tutka Bay Lagoon Hatchery is a state owned facility operated by the Cook Inlet Aquaculture Association (CIAA). Recent and significant investments in infrastructure have been made at this location which is currently under project development. The elimination of this area from an established SHA in Tutka Bay would require an increase in cost recovery efforts in other SHAs such as the Hazel (241-93) and China Poot (241-92) SHAs. Sockeye enhancement in China Poot and Hazel lakes are sourced from TBLH. The inability to harvest fish returning to TBLH will jeopardize the future of both of these sockeye projects.

The proposer cites protection of Head End Creek and Southern Glacier Creek and lead lines damaging bottom habitat in shallow areas as reasoning for eliminating commercial and cost recovery fisheries in Tutka Bay. These shallow areas can be protected through current ADF&G



management authority without closing a large area. Tutka Bay, including the Tutka Bay SHA, is cooperatively managed to target fish returning to the hatchery. The area is actively managed by regulation or emergency order by ADFG in consultation with the hatchery operator. This is common practice and good management for Tutka Bay.

UFA opposes proposal 25 and asks the BOF not support this proposal.

Respectfully,

Matt Alward  
President

Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association  
Alaska Trollers Association • Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United  
Douglas Island Pink and Chum • Fishing Vessel Owners Association • Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula  
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Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Cook Inlet Drift Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association

**RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing**

I am opposed to Proposal 26, because it is not needed.

## RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing

Please oppose this proposal. This area is only opened by emergency order and is typically only open for a good reason, when there are excess fish that need to be kept out of the rivers to avoid over escapement. The current regs Protect the rivers to the standards of other anadromous rivers around the state. Closing this area will impact ability of CIAA and common property to harvest returning hatchery fish for sale.



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November 21, 2019

**Board of Fisheries**

**Proposal 26 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

Cook Inlet Aquaculture Association (CIAA) is a non-profit corporation founded in 1976 to provide and protect the salmon resource in Area H. We produce hatchery-born, ocean-raised salmon for the common property fishery in Cook Inlet and the outer Kenai Peninsula. Maintaining and improving salmon habitat and natural salmon populations is also an important part of CIAA's work. We recognize the value of both hatchery and naturally produced salmon fisheries.

Tutka Bay Special Harvest Area (SHA), Statistical Area 241-07, is the primary cost recovery location for Tutka Bay Lagoon Hatchery (TBLH) salmon operations. This proposal will close the southeastern portion of the existing SHA to commercial and cost recovery fishing.

The southeastern portion is currently managed by Alaska Department of Fish and Game (ADF&G) under existing regulations. Areas of concern raised by the proponent are currently regulated by **5 AAC 39.290 Closed Waters**, *where commercial fishing is prohibited; 1) within the fresh water of streams and rivers of this state; 2) within 500 yards of the fresh water of a stream that is a salmon stream; or 3) over the beds or channels of fresh water of streams and rivers of this state during all stages of the tide and 5 AAC 21.350 Closed Waters*, (h) *In any bay, estuary, slough, or lagoon less than 300 feet in width at mean lower low water, (i) In all other streams or rivers within 500 yards of the terminus or as specified in 5 AAC 39.290.* In addition, ADF&G manages the area by emergency order which is a common management practice.

The reduction to harvest in an established SHA will only increase harvest efforts within the remaining Southern District SHAs in order to achieve CIAA's goals of funding operations and other fisheries enhancement and support programs throughout Lower Cook Inlet and the Outer District.

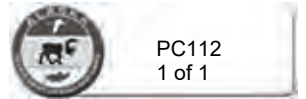
The Tutka Bay Subdistrict, including the Tutka Bay SHA, is cooperatively managed to target fish returning to the hatchery. The area is actively managed by regulation or emergency order by ADF&G in consultation with CIAA. This is common practice and good management for Tutka Bay.

Respectfully,

Dean Day  
Executive Director

Daniel Farren

11/25/2019 05:07 PM AKST



**RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing**

Some individuals are a little too possessive of Tutka Bay.



## RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing

KPFA opposes proposal 26. The head of Tutka Bay streams are already protected by a perimeter from the stream mouth as a no commercial fishing zone. Streams are listed in the anadromous catalog and therefore are protected by a no fishing radius. Additionally, ADF&G closes a large part of the Bay when managing for wild returns.

## RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing

I am an area H purse seine permit holder and oppose this proposal, The 500 yard stream closures effectively protect the areas mentioned in this proposal and it's not necessary to add this.

November 25, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 26**

Dear Chairman Morisky and Board of Fisheries members,

I live in Homer and own a Lower Cook Inlet seine permit and I oppose proposal 26. I've been running my own boat for the last 15 years and have raised my family on the back deck. I strongly believe in protecting important fish habitat but I believe that current regulations and Department of Fish and Game emergency order authority give more than adequate protections to the head of Tutka Bay.

The shallow waters at the head of Tutka Bay are already protected by closed waters around stream terminuses as regulated by 5AAC39.290, 5AAC21.350 and 5AAC39.290. The already closed waters encompass a large portion of the proposed closure area already and on top of the listed regulations the Department has emergency order authority which gives them the ability to protect any waters they determine need protecting. The department opposes proposal 26 and says "the existing 500-yard stream closures per 5 AAC 21.350(i) is sufficient sanctuary from harvest for wild coho and chum salmon occurring there."

The proposed closure is also part of the Tutka Bay Lagoon Hatchery special harvest area. Otolith samples indicate that the fish harvested in this area are predominantly Tutka Bay Lagoon Hatchery produced fish. Closing part of the SHA would limit Cook Inlet Aquaculture Association's and the commercial fishing fleet's ability to harvest hatchery produced fish which could cause straying problems along with wasting fish.

Given that the Department already has sufficient protections already in place for this proposed closed area I encourage you to oppose proposal 26.

Sincerely,

Matthew Alward



**RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing**

This area is actively managed by Fish and Game - and is already closed within 500 yards of the fresh water. This proposal is not necessary.

## RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing

Dear Chairman Morisky and Alaska Board of Fisheries Members: PWSAC opposes Proposal 26. The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization employing 45 full time staff members and 75 seasonal workers and a budget exceeding \$14 million annually which is funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and many thousands more stakeholders who benefit from PWSAC production, including: commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists and salmon processors. PWSAC is OPPOSED to Proposal 26, which seeks to close waters near the head of Tutka Bay to commercial salmon fishing. We believe that the Alaska Board of Fisheries lacks the statutory authority to take the action as requested by the Proposers. The Alaskan Legislature invested the Alaska Department of Fish and Game with the legal duty to oversee all aspects of hatchery creation, operation, and production, whereas the Board is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve. As part of the Department's oversight of hatchery production, there is an intricate and public system of annual hatchery plans that are reviewed annually by the department. These Annual Management Plans (AMPs) are reviewed and discussed in public forums known as Regional Planning Teams (RPTs), which address how hatchery operators conduct their cost recovery harvests at each hatchery and address other specifics of hatchery operations. The Department and the Board have respected and abided by these processes and this division of labor for over 30 years, and we request that this relationship continues. Please reject Proposal 26. Sincerely, Tommy Sheridan General Manager/CEO Prince William Sound Aquaculture Corporation

## RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing

This is similar to Proposal 25 and the same defense applies in that ADF&G has adequate protections in place for the streams. I read both these proposals as veiled attempts to eliminate commercial fishing from Kachemak Bay and when the Park was originally proposed part of the way they persuaded the local community to vote for it was by saying that our traditional lifestyles and occupations within the Park would always continue. Now they are trying to change the tune by a back handed attempt to destroy the legitimate and well managed local commercial fishing industry. Thank you.



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

November 25, 2019

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

**RE: Proposal 26 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

**UFA opposes BOF Proposal 26. This proposal requests the Board of Fisheries to close to commercial and cost recovery fishing the southeastern end of Tutka Bay including a portion of the Tutka Bay Lagoon Hatchery Special Harvest Area. This area is actively managed by regulation and emergency order by ADFG and should not be removed from commercial and cost recovery harvests.**

The southeastern end of Tutka Bay is currently managed by Alaska Department of Fish and Game (ADFG) under existing regulations. Areas of concern raised by the proponent are currently regulated by **5 AAC 39.290 Closed Waters**, *where commercial fishing is prohibited; 1) within the fresh water of streams and rivers of this state; 2) within 500 yards of the fresh water of a stream that is a salmon stream; or 3) over the beds or channels of fresh water of streams and rivers of this state during all stages of the tide* and **5 AAC 21.350 Closed Waters**, *(h) In any bay, estuary, slough, or lagoon less than 300 feet in width at mean lower low water, (i) In all other streams or rivers within 500 yards of the terminus or as specified in 5 AAC 39.290.* In addition, ADFG manages the area by emergency order.

A reduction of the established Tutka Bay Lagoon Hatchery (TBLH) Special Harvest Area (SHA) will increase harvest efforts within the remaining Southern District SHA's in order to achieve the hatchery operator's goals of funding hatchery operations and other fisheries enhancement and





support programs throughout Lower Cook Inlet. The Tutka Bay Subdistrict, including the Tutka Bay SHA, is actively managed by regulation or emergency order by ADFG in consultation with the hatchery operator. This is an indicator of good management.

UFA opposes proposal 26 and asks the BOF not support this proposal.

Respectfully,

Matt Alward  
President

Frances H. Leach  
Executive Director

#### MEMBER ORGANIZATIONS

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



## RE: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing

PROPOSAL 26 – SUPPORT 5 AAC 21.350. Closed waters Tutka Fisherman need to see closed water lines on charts put out by ADFG to avoid confusion. Do they know about 500 yards and from where? Please replace (4) waters of Tutka Bay southeast of 59° 25.50' N. lat.; Please put these lines back into regulation Closed Waters Boundary coordinates 5AAC 21.350 (d) (4), to clearly show closed waters to avoid confusion to fisherman. These closed waters were removed to give CIAA exclusive use of the head of Tutka Bay because they have been bullying the park to get a permit. Three State Park Directors have denied these permits because what they want to do is illegal. All other systems have these “markers” and Tutka Bay should not be left exposed to mistakes and needs consistency to align with the other systems especially to protect Dungeness crab in this shallow nursery and to protect what's left of the portfolio stocks that we are in hopes have not been replaced by hatchery fish. The reason fisherman don't get hatchery strays before they enter streams in these areas is because they are not fishing here in this SHA only open to cost recovery boats. Most fisherman do much better fishing the outside district so few wait in hopes for blackened hatchery humpies coming into the hatchery if...they are ever allowed to fish in this SHA. Four fisherman and five LCI seine boats, of the CIAA cost recovery fleet were busted by fish and wildlife protection poaching 16 tons of chum salmon last year in Koyuktoalik , These people are also on the CIAA Board of Directors and the Regional Planning team. Since it was figured through fish tickets that this wasn't the first time they have been poaching it is no wonder they also weren't available to keep fish cleaned out of Tutka Bay SHA so it stands exposed and vulnerable to stray Tutka PWS and Port Graham hatchery fish. To watch as ADFG cater to CIAA and sacrifices wild stocks that are “significant” to park users is wrong. Tutka Bay is not PWS where all streams have been pretty well replaced with maladapted hatchery fish. Tutka Bay is a river system in the park that is the gateway into the wilderness park. It is glacial fed and spills into a unique beautiful silled fjord that is a shrimp spawning concentration area and Dungeness crab reproductive concentration area. Please bring coordinates back in line with all other closed river systems to alert fisherman that this is not a free for all to scape seine on sensitive areas. that do not want these portfolio populations sacrificed for a hatchery. This is a prime example of not having significant public benefit while jeopardizing wild natural stocks. To put these lines back into regulation Closed Waters Boundary coordinates 5AAC 21.350 (d) (4), (4) waters of Tutka Bay southeast of 59° 25.50' N. lat.; to clearly show closed waters to avoid confusion to fisherman. All seven other systems have these closed waters “markers” and Tutka Bay needs them also especially to protect Dungeness crab in this shallow nursery. Fisherman need to see closed water lines to avoid confusion. (d) Southern District (1) northeast of a line from an ADF&G regulatory marker at 59° 44.50' N. lat., 151° 02.10' W. long., to an ADF&G regulatory marker on the shore one-half statute mile southwest of the terminus of Swift Creek at 59° 47.15' N. lat., 151° 05.45' W. long.; (2) waters of China Poot Bay south and east of the Homer Electric Association power line; (3) waters of Sadie Cove south of 59° 30.00' N. lat.; (4) waters of Tutka Bay southeast of 59° 25.50' N. lat.; (5) waters of Jakalof Bay south of 59° 28.07' N. lat.; (6) waters of Seldovia Bay south of a line from an ADF&G regulatory marker located at 59° 25.09' N. lat., 151° 42.57' W. long., to an ADF&G regulatory marker located at 59°24.84' N. lat., 151° 43.06' W. long.; (7) waters of Port Graham Bay south of 59° 20.44' N. lat.; (8) Northshore Subdistrict.

## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

I oppose Proposal 27 because we need the Halibut Cove Lagoon Special Harvest Area. There is no reason to legislate it away now.

## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

Please oppose this proposal. The lagoon is an established SHA in the hatchery plan. This SHA has been seldom used in the recent years but should remain accessible for CIAA to help their future projects.

## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

KPFA opposes Proposal 27. Halibut Cove has been a commercial harvest site for many years and provides opportunity for pink salmon harvest. There is one small anadromous stream listed in the Alaska Anadromous Stream Catalog but it is a very small, steep stream with little production according to ADF&G. Therefore, there are no conflicts with wild stock at Halibut Cove. The author declares the pink salmon are detrimental to the Chinook salmon releases at Halibut Cove. Chinook smolt are some 20 to 40 times larger than pink salmon fry and do not compete with Chinook salmon of that size. It is far more likely that Chinook smolt eat pink fry.

## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

I am an area H purse seine permit holder and oppose this proposal, I do not see any reason to eliminate this special harvest area.

November 25, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 27**

Dear Chairman Morisky and Board of Fisheries members,

I live in Homer and own a Lower Cook Inlet seine permit and I oppose proposal 27. I raised my family on the back deck of our boat and we support the state hatchery programs and special harvest areas that go with them.

Proposal 27 would eliminate the Halibut Cove Lagoon Special Harvest Area (SHA). Although the board has the authority to remove the SHA from regulation, the permit and basic management plan (BMP) for the Tutka Bay Lagoon Hatchery still defines the Halibut Cove Lagoon as a special harvest area. Keeping the SHA in regulation would give more clarity of the SHA boundaries for fishermen should Cook Inlet Aquaculture Association resume hatchery release in Halibut Cove Lagoon.

The Department of Fish and Game in consultation with the hatchery operators actively manages SHA's including the Halibut Cove Lagoon SHA through regulation and their emergency order authority. This is a time proven management practice that protects local stocks and habitat.

In closing I encourage you to leave the Halibut Cove Lagoon SHA area defined in regulation and oppose proposal 27.



Sincerely,

Matthew Alward



## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

Hatchery enhancement activities and Cost Recovery are an approved use of the Kachemak Bay State Park. If a SHA needs to be modified it can be done through the RPT.

## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

Dear Chairman Morisky and Alaska Board of Fisheries Members: PWSAC opposes Proposal 27. The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's economy following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization employing 45 full time staff members and 75 seasonal workers and a budget exceeding \$14 million annually which is funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and many thousands more stakeholders who benefit from PWSAC production, including: commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists and salmon processors. PWSAC is OPPOSED to Proposal 27, which seeks to eliminate the Halibut Cove Lagoon Special Harvest Area. We believe that the Alaska Board of Fisheries lacks the statutory authority to take the action as requested by the Proposers. The Alaskan Legislature invested the Alaska Department of Fish and Game with the legal duty to oversee all aspects of hatchery creation, operation, and production, whereas the Board is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve. As part of the Department's oversight of hatchery production, there is an intricate and public system of annual hatchery plans that are reviewed annually by the department. These Annual Management Plans (AMPs) are reviewed and discussed in public forums known as Regional Planning Teams (RPTs), which address how hatchery operators conduct their cost recovery harvests at each hatchery and address other specifics of hatchery operations. The Department and the Board have respected and abided by these processes and this division of labor for over 30 years, and we request that this relationship continues. Please reject Proposal 27. Sincerely, Tommy Sheridan General Manager/CEO Prince William Sound Aquaculture Corporation

## RE: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area

There is no direct conflict with wild stocks or present chinook stocking in this Special Harvest Area. ADF&G had adequate power and enough laws on the books to safely regulate this fishery and to protect any fish in season as they deem necessary. This is another attempt to eliminate commercial fishing in the Bay and I oppose it. Generations of Alaskans from Homer and elsewhere have commercially fished in the Bay and have flourished under the good management of ADF&G. Thank you.



**Mailing Address:** PO Box 20229, Juneau AK 99802-0229  
**Physical Address:** 410 Calhoun Ave Ste 101, Juneau AK 99801  
**Phone:** (907) 586-2820 **Fax:** (907) 463-2545  
**Email:** [ufa@ufafish.org](mailto:ufa@ufafish.org) **Website:** [www.ufafish.org](http://www.ufafish.org)

November 25, 2019

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**RE: Proposal 27 - Opposition**

Chairman Morisky, Members of the Alaska Board of Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast.

**UFA opposes BOF Proposal 27. This proposal requests the Board of Fisheries to “eliminate the Halibut Cove Lagoon Special Harvest Area. This area is actively managed by regulation and emergency order by ADFG and should not be removed from cost recovery harvests.**

Halibut Cove has been a commercial harvest site for many years and provides opportunity for pink salmon harvest. There is one small anadromous stream listed in the Alaska Anadromous Stream Catalog but it is a very small, steep stream with little production according to ADF&G. Therefore, there are no conflicts with wildstock at Halibut Cove.

The proponent declares the pink salmon are detrimental to the chinook salmon releases at Halibut Cove. Chinook smolt are larger than pink salmon fry and do not compete with chinook salmon of that size. All estuaries are productive, since by definition estuaries are the confluence of ocean and freshwater where nutrients mix, dead salmon are deposited, and diversity of species is maximized

The Halibut Cove and Halibut Cove Lagoon Subdistricts, including the Halibut Cove SHA, are actively managed by regulation or emergency order by ADFG in consultation with the hatchery operator. This is an indicator of good management.

UFA opposes proposal 27 and asks the BOF not support this proposal.

Respectfully,

Matt Alward  
President

Frances H. Leach  
Executive Director

## **PROPOSAL 27**

### **5 AAC 21.350. ELIMINATE HALIBUT COVE SHA**

## **PROPOSAL 27 SUPPORT**

### **5 AAC 21.372. Tutka Bay Lagoon Salmon Hatchery Management Plan.**

**Eliminate the Halibut Cove Lagoon Special Harvest Area** because it is located in Kachemak Bay State Park with unique statutory and regulatory authority that is different from ADFGs directives so this SHA is invalid because it removes access.

Management Authority of Kachemak Bay State Park is administered as per the constitution, by Alaska Division of Parks and Outdoor Recreation, a **Division** of Alaska Department of Natural Resources.

As Division of Commercial Fisheries reports to the ADFG Department commissioner, the Division of Parks and Outdoor Recreation reports to the ADNR Department commissioner, but with separate distinct mandates.

Halibut Cove Lagoon as well as Tutka Bay and the Lagoon and most of the land and water in between is located within Kachemak Bay State parks land and water boundaries. This means it is a Legislatively Designated Area (LDA) with its own set of statutes and regulations that it shall follow. To formalize these distinctions in Kachemak Bay, because it overlaps another jurisdiction, the Kachemak Bay Critical Habitat Area, ADFG and ADNR signed a cooperative agreement in 1989 to line out these differences for better understanding and cooperation.

**“Nothing herein is intended to conflict with federal, state, or local laws or regulations. If there are conflicts, the laws and regulations shall prevail.”<sup>1</sup>**

**WHAT ARE THE CURRENT ADFG REGULATIONS?** Halibut Cove Lagoon is defined as a special harvest area (SHA) in 5 AAC 21.372(b)(3) (Figure 27-1) (on the ADFGs Comments)

**WHAT ARE THE CURRENT ADNR STATUTES?** An SHA placed within Park boundaries by using chapter ADFG’s 21 is not recognized because commercial activities like commercial aquaculture activities, is not commercial fishing, so it

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<sup>1</sup> Cooperative Agreement between the ADFG and ADNR 1989

requires a park permit be submitted A park permit is required for any enhancement activity within Park Boundaries.

11 AAC 12.340(19) "commercial activity" may not be compatible to park mandates. This land and water is reserved from the Public Domain as per the constitution Article VIII sec 7 Special Purpose Sites and the Legislature when they established this Special Purpose Scenic Park.

Added on to this authority is AS 41.21.131. Kachemak Bay State Park  
Established in 1970

**(a)** The presently state-owned land and water, and all that acquired in the future by the state, lying within the parcels described in this section are designated as the Kachemak Bay State Park. In order to protect and preserve this land and water for its unique and exceptional scenic value, the park is established and **shall** be managed as a scenic park. The land and water lying within the following described parcels is reserved from all uses incompatible with its primary function as a scenic park and is assigned to the department for control, development, and maintenance.

“Department” in Section 41 means Department of Natural Resources not Department of Fish and Game.

#### **AS 41.21.990. Definition of Scenic Park**

**(1)** "scenic park" means relatively spacious areas of outstanding natural significance, where major values are in their natural geological, faunal or floral characteristics, the purpose of which is directed primarily toward the preservation of its outstanding natural features and where development is minimal and only for the purpose of making the areas available for public enjoyment in a manner consistent with the preservation of the natural values such as camping, picnicking, sightseeing, nature study, hiking, riding and related activities which involve no major modification of the land, forests or waters, and without extensive introduction of artificial features or forms of recreational development that are primarily of urban character;

### **WHAT ARE THE CURRENT DPOR REGULATIONS?**

11 AAC 12.340(19) "commercial activity" means the sale of, delivery of, or soliciting to provide, goods, wares, edibles, or services in exchange for valuable consideration through barter, trade, or other commercial means; a service offered in conjunction with another sale of goods, wares, edibles, or services, which service involves the use of state park land or water, is a commercial activity whether or not it is incidental to, advertised with, or specifically offered in the original sale; all guide, outfitter, and transportation services are commercial activities if any payment or valuable consideration through barter, trade, cash, or other commercial means is required, expected, or received beyond the normal and customary equally shared costs for food and fuel for any portion of the stay in the park.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** Removal of the SHA would reduce the confusion and intrusion into a jurisdiction not under the authority of ADFG. State Parks require commercial permits for any commercial activity so it can deliberate if activities are incompatible with its mandates.

Removing the regulatory language that defines Halibut Cove Lagoon as a SHA will also remove the misunderstanding barrier that state park waters can be closed by a permit and basic management plan (BMP) for the Tutka Bay Lagoon Hatchery using a foreign set of regulations that do not pertain to the park.

ADFG can pretend that this still defines the Halibut Cove Lagoon as a SHA, but from Park authority perspective under its jurisdictions it does not recognize this as valid. What the park does consider valid is when it receives a permit for a commercial use other than commercial fishing. Commercial aquaculture activities are not commercial fishing activities.

Cook Inlet Aquaculture Association is not allowed to continue to use the lagoon as a remote release site for pink salmon produced at the Tutka Bay Lagoon Hatchery unless the park permit is deliberated and authorized and issued by park authority.

## **RE: PROPOSAL 28 Redefine the China Poot and Hazel Lake Special Harvest Area as two separate and discrete Special Harvest Areas**

Please support with modification. The boundary between the 2 SHAreas should be moved north to the next point on China Poot Spit, or half way to the point. Most all of the fish movement on the spit is westward and very few of the China Poot fish come that far down the outer beach. There are a limited number of China Poot fish that back out of China Poot bay to the immediate cove at the end of the spit on extreme low tides.



**RE: PROPOSAL 28 Redefine the China Poot and Hazel Lake Special Harvest Area as two separate and discrete Special Harvest Areas**

i am an area H purse seine permit holder and I support this proposal. This will clarify the areas for fishermen.

## RE: PROPOSAL 29 Move the outer boundary line of the Rocky Bay subdistrict further from shore

PROPOSAL 29 – OPPOSE 21.200. Fishing districts, subdistricts, and sections. Outer boundary line of the Rocky Bay subdistrict PLEASE AMEND PROPOSAL 29 TO CLOSE SCURVY CR SECTION TO ALLOW DEPRESSED COHO POPULATIONS TO RECOVER. PROPOSED BY: Cook Inlet Seiners The Rocky Bay District is in the LCI Outer District in the Gulf of Alaska. Remote yet very accessible for commercial and sport vessels. This salmon system is a rich collective of 23 portfolio populations that support rearing and spawning wild Coho, chum, pink, and dolly varden. For the past 7 years the Coho appear to be experiencing declines. This system needs observation to ensure it remains intact and any lines changed must be in the favor of sustaining these smaller yet “significant” collectives of multiple salmon populations especially 242-32-10140. The Anadromous waters atlas Quadrangle Number 051 - Seldovia B4, depicts this collective in a branching filigree that deserves consideration. 242-31-10120 242-31-10125 242-31-10122 242-31-10120-2149 242-31-10120-2159 242-31-10130 242-31-10120-2155 242-31-10120-2160 242-31-10120-2282 242-31-10120-2155-3039 242-31-10120-2251 242-31-10119 242-31-10120-2155-3040 242-31-10120-2272 242-31-10117 242-31-10120-2155-3048 242-31-10120-2272-3007 242-32-10140 242-31-10114 242-31-10119-2010 242-31-10116 242-31-10115 242-31-10119—2010-3005

**RE: PROPOSAL 29 Move the outer boundary line of the Rocky Bay subdistrict further from shore**

Please support this proposal. From years of observation of fish movement in outer Rocky bay and outer windy bay there doesnt seem to be much overlap of fish entering the 2 distinct districts in this outer area.

## RE: PROPOSAL 29 Move the outer boundary line of the Rocky Bay subdistrict further from shore

I am an area H purse seine permit holder and support this proposal. I have fished in this area and a times fish stage just outside the current line. This proposal will improve fishing opportunity with minimal downside in my opinion.

## RE: PROPOSAL 29 Move the outer boundary line of the Rocky Bay subdistrict further from shore

This will allow a more efficient harvest of chum salmon in this subdistrict before the quality of the fish is degraded from them being near fresh water for too long without being harvested. This will not put the escapement goal at risk of not being achieved - and this will not cause fish going to other subdistricts such as Windy Bay to be intercepted.

**RE: PROPOSAL 30 Allow the Kamishak Bay District commercial salmon fishery to be opened prior to June 1 by emergency order**

Please support this proposal. This gives ADFG the opportunity of opening this area early depending on run timing and strength.

**RE: PROPOSAL 30 Allow the Kamishak Bay District commercial salmon fishery to be opened prior to June 1 by emergency order**

I am an area H purse seine permit holder and I support this proposal. The proposal allows management flexibility without requiring any change if management does not think it is warranted.

## RE: PROPOSAL 31 Allow commercial fishing along the beach outside of Ursus Cove Lagoon

The Ursus Cove closed waters regulatory markers, when moved off the beach in the 1990's, resulted in healthier chum salmon escapements. Lagoons are a critical habitat for salmon to use tidal swing to move in and out as they osmo-regulate to adjust the salt content in their bodies until they can tolerate fresh water again. (AWC 248-10-10010). With McNeil River chum salmon a stock of management concern in 2016 and low escapements in 2019, These waters require conservative management for these fine wild chum salmon.



## RE: PROPOSAL 31 Allow commercial fishing along the beach outside of Ursus Cove Lagoon

Please support this proposal. Sometime in the 90s the line was moved out from the spit and since then there has been almost no harvest from this area. The Ursus lagoon is an elaborate lagoon and river system that once the fish enter they don't come back out with the tides. There are no other areas along the shoreline outside of markers for fishing without damaging nets. Moving the markers back to the beach would allow for some harvest of this chum run and will avoid over escapement allowing for a more consistent escapement so and return.

## RE: PROPOSAL 31 Allow commercial fishing along the beach outside of Ursus Cove Lagoon

I am an area H purse seine permit holder and I support this proposal. The current closure line is difficult to fish around due to the terrain and this proposal would allow for more opportunity.

## RE: PROPOSAL 31 Allow commercial fishing along the beach outside of Ursus Cove Lagoon

I support this proposal as it will help prevent overescapment into Ursus Lagoon Creeks. In the last 15 Years from 2005-2019 the beach outside of Ursus Lagoon has only been open to seining in 2 seasons (2005, and 2006). In the last 15 years from 2005-2019 the Maximum SEG has been exceeded in 10 of those years. Changing the closed waters of Ursus Subdistrict to the proposed coordinates will help prevent this over escapement from continuing. The proposed coordinates are more than 500 yards from any freshwater of anadromous salmon streams.

## RE: PROPOSAL 32 Repeal closed waters in China Poot Bay

I oppose this proposal. It is against Alaska state statutes and bad fisheries management to designate a natural resource to a single entity, excluding the public. The failure of CIAA to meet their goals, financial or otherwise, is not the public's responsibility. The trend of allotting resources to CIAA and excluding commercial fishermen and sport fishermen is bad management and needs to stop. If CIAA can't manage the programs they start without excluding other user groups then CIAA needs to end its existence. It is contrary to every principle under which hatcheries were created to exclude users just to benefit a hatchery.

## RE: PROPOSAL 32 Repeal closed waters in China Poot Bay

Please support this proposals with changes. There are some errors in the comments from ADFG concerning this area. The only crab sanctuary ever in this area was the eastern 1/3 of the north section east of the power line. I fished this area before and after the original crab sanctuary was established. The remainder of the north section is fairly deep and the crab sanctuary worked well and should be kept were it was. There was never a crab sanctuary in the south arm east of the power line as stated by ADFG. The commercial and cost recovery fishery for hatchery sockeye was always up to the crab sanctuary on the north arm and up to the prominent point at the personal use dip net area of the creek in the south arm. Historically there were markers at the power line that were removed for the sockeye fishery and recognized later in the summer to protect any pink salmon return. I don't think there has been any substantial pink salmon return to China Poot bay since the 1964 earthquake. By closing the bay at the power line it severely limits the ability to conduct cost recovery. ADFG also states that fish beyond the powerline stay there and should be used by sport and personal use. There can be substantial numbers of fish that go past the power lines and are inaccessible to cost recovery or common property fishing. This is a hatchery produced run and cost recovery should have priority over any other fishery. By closing an area to to common property or cost recovery it is allocating fish to another user group. There should be no consideration of conflict between user groups as I think commercial fishing has right of way. These fish are paid for by the taxation of the commercial harvest and cost recovery by CIAA. If cost recovery isn't allowed to proceed than this fishery could easily disappear. There is no contribution from any sport groups or sport fish division of ADFG toward this fishery and thus any allocation of the fishery should not be considered. At this time any state resident can dipnet 6 fish and then snag 6 fish from China Poot bay as daily limit with no annual limit, no reporting by permit, creel census or voluntary reporting. That is 12 fish per angler with many boats taking full limits many days during the open periods. The area available to cost recovery is almost impossible to fish with the large tidal and current variations in the bay. Again, historically all the commercial and cost recovery fishing in China Poot bay was done on the east side of the power line in the north arm up to the crab sanctuary and on the east side of powerline in the south arm up to the point at the dipnet area and including the southeast arm of the south arm. ADFG has briefly opened small areas, as stated, above the powerline for cost recovery and it has been fairly unsuccessful as the fish may or may not be there when open. Please refer to proposal #16 and reconsider requiring a personal use permit for the China Poot personal use fishery as all the other personal use fisheries require a permit and catch reporting. These issues should be resolved now before there is another substantial return to China Poot bay. This fishery has been a very good addition to the personal use, sport, commercial, and hatchery sockeye production in Kachemak bay and should be treated that way. Please support this proposal with changes to protect the smaller crab sanctuary in the north arm and the small dipnet area in the south arm and allow for closure of the area in August for the pink salmon return. I believe the total daily limit should be six fish either and or dipnet or sport harvest.

## RE: PROPOSAL 32 Repeal closed waters in China Poot Bay

The current closure line in China Poot Bay was put into regulation to protect spawning pink salmon in China Poot Creek. The pink salmon return and spawn in August. The closure line was put into regulation before Cook Inlet Aquaculture Association started planting Sockeye into the system. The sockeye salmon are not able to swim to China Poot Lake due to a waterfall blocking their passage. These fish need to be harvested to prevent straying and to allow the pink salmon to use the stream in August when they return. When the sockeye were planted ADFG changed the management strategy in China Poot Bay to allow the seiners and CIAA to harvest these fish both in the common property and cost recovery fisheries. The closed water regulatory line was often repealed in the beginning of the fishing season and it was reinstated around August 1 to protect the returning pink salmon. In more recent years ADFG has stopped using this management strategy and is keeping this area closed for all or most of the season. This is creating a situation where there are more sockeye getting into China Poot Creek than can be efficiently harvested by the Sport and PU Dipnet Fishery. A compromise would be to have the closed water line in effect only after August 1 each year to protect the spawning pink salmon as originally intended.

**RE: PROPOSAL 33 Close the area within a one-mile radius of the end of the Homer Spit to commercial salmon fishing**

I am an area H purse seine permit holder and I oppose this proposal. In my experience fishing very rarely occurs around the tip of the Homer Spit and therefore very little interference with vessel traffic I do not believe there is biological or practical justification for this proposal.

## RE: PROPOSAL 33 Close the area within a one-mile radius of the end of the Homer Spit to commercial salmon fishing

This has been an open area to Commercial Seining in Lower Cook Inlet for over 40 years. There has never to my knowledge been any accidents or dangerous situations from this open area. The commercial seine boats are required to use markers and lights to notify other vessels of commercial fishing activity. There are many areas where commercial fishing activity takes place in areas of high traffic. It is just part of commercial fishing in populated areas. Closing the area for 1 mile from the tip of the spit is also a hard closed area to enforce without having a defined Lat & Long of closed areas. The vast majority of the marine traffic going around the tip of the Homer Spit travels within 1/4 mile of the beach - Closing out a full Mile is far more than would be needed and infringes greatly on my commercial fishing area.



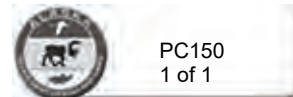
## RE: PROPOSAL 33 Close the area within a one-mile radius of the end of the Homer Spit to commercial salmon fishing

Please support this proposal only with modification to change it to within 1/2 mile of the end of spit Otherwise oppose this proposal. Historically the area outside 1/2 mile has been a productive area for seining for sockeye coming into the bay destined for the areas on the south side of the bay. A high percentage of the boat traffic is within 1/4 mile of the spit and historically there has never been conflicts with boat traffic or King/coho intercepting in this area offshore. The duration of the early entry of sockeye in this area is a very short period of time but can be a substantial portion of my commercial harvest. The seine fishery at the end of the spit has been almost nonexistent we shouldn't loss valuable fishing area to someone's invention of a problem. To my knowledge in 38 years I don't remember any nets getting run over off the spit except subsistence gill nets. Against what fish and game states, in the old days there was a commercial coho seine fishery on the beaches of mud bay with 15 or 20 boats lined up for openings.

## RE: PROPOSAL 33 Close the area within a one-mile radius of the end of the Homer Spit to commercial salmon fishing

Interception & safety are the issues. Commercial purse seine interception of returning hatchery fish to the Dudiak Lagoon prevents children, elderly, and disabled individuals from having an opportunity to catch returning kings and silvers.

Kenny Bingaman  
Recreational Resident Sports Fisherman  
11/19/2019 12:01 PM AKST



## RE: PROPOSAL 33 Close the area within a one-mile radius of the end of the Homer Spit to commercial salmon fishing

I feel the proposals author ha hit the nail on the head. I support this proposal.

## RE: PROPOSAL 34 Reduce the maximum length of seine gear in the Cook Inlet Area to 150 fathoms

Chairman Morisky and members of the Alaska Board of Fish: I oppose this proposal. It is a draconian measure to reduce seine efficiency. There are only approx. 20-25 seiners fishing in all of Lower Cook Inlet at any one time. From Cape Douglas in the West to well East of Resurrection Bay. Gear density is minimal compared to anywhere else in the State. Furthermore, the current 250 fathom seine length limit in LCI is on par with the other seine districts/area around Alaska. I'm unclear why Lower Cook Inlet should be singled out for such gear reduction. It also seems odd that this gear restriction proposal is to be imposed on just one gear type, given the supposed concerns of the author. Thank you.

## RE: PROPOSAL 34 Reduce the maximum length of seine gear in the Cook Inlet Area to 150 fathoms

Please oppose this proposal. I don't believe there has been any problem with over efficiency in the fleet reflected by most often getting escapement goals in most systems annually. ADFG has been very effective with open and closed areas by emergency order to control escapement levels and harvest levels. Please oppose this proposal.

**RE: PROPOSAL 34 Reduce the maximum length of seine gear in the Cook Inlet Area to 150 fathoms**

I am an area H purse seine permit holder and I oppose this proposal. There is no reason to reduce seine length in this area and it would be an expense to the fleet to convert gear.

November 25, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

Alaska Board of Fisheries

Alaska Department of Fish and Game, Boards Support Section

P.O. Box 115526

Juneau, Alaska 99811-5526

**Re: Opposition to proposal 34**

Dear Chairman Morisky and Board of Fisheries members,

I am a Homer resident and commercial fisherman and I oppose proposal 34 that would reduce the length of a Lower Cook Inlet purse seine from 250 fms to 150 fms.

The author of this proposal claims it is to control the harvest of Upper Cook Inlet bound fish. If the department of Fish and Game felt that there was too much incidental harvest of Upper Cook Inlet bound fish they already have the tools available to control that harvest. The department regulates the take of fish through time and area openings and closures with the seine specifications set in regulation and have never claimed that they need gear restrictions on top of emergency order authority to manage the Lower Cook Inlet fishery.

On top of not being necessary to manage the fishery, this proposal would have considerable cost to the individual fishermen to modify their seine nets.

For this reason and the fact that the department does not need gear restrictions to manage the fishery I encourage you to oppose proposal 34.

Sincerely,

Matthew Alward

## RE: PROPOSAL 34 Reduce the maximum length of seine gear in the Cook Inlet Area to 150 fathoms

Restrictions to the Lower Cook Inlet seine to 150 fathoms would greatly reduce the effectiveness of the Lower Cook Inlet Seiners. Lower Cook Inlet seiners are currently managed effectively by the Fish and Game personnel through area time and area on a regular basis. The fleets is currently able to harvest fish numbers efficiently in all areas with the current gear length. Currently Lower Cook Inlet seiners are restricted to 48 hours per week when targeting red and pink salmon in Lower Cook Inlet, Kachemak Bay area. Reducing the length of Cook Inlet Seines would be detrimental in the fleet ability to effectively harvest targeted species during the limited time allotted. The fleets ability to harvest pink salmon in large numbers for common property, and cost recovery in some locations of the regulatory area would become problematic and could very well lead to over escapement and excess numbers of hatchery fish returning to waters outside seiners reach. In addition, the cost of retrofitting a seine to the shorter length would be a heavy burden on the fleet financially. It is not a simple process to just shorten a seine. Substantial cost and time would be involved to adjust seine in order to comply with this law.



**RE: PROPOSAL 35 Increase the maximum purse seine gear depth in the Cook Inlet Area  
from 325 to 335 meshes deep**

Please support this proposal. This proposal allows a narrow border for ease of hanging in gear. Without this proposal passing it would be necessary to have, at substantial cost, custom web made to comply with the existing regulations.

**RE: PROPOSAL 35 Increase the maximum purse seine gear depth in the Cook Inlet Area  
from 325 to 335 meshes deep**

I am an area H purse seine permit holder and I support this proposal. This proposal allows for border strips and chafing gear which are part of modern seine construction. I personally do not use a full depth seine so while this would not directly affect me I do support the change for fishermen wanting to use full depth seines.

## RE: PROPOSAL 35 Increase the maximum purse seine gear depth in the Cook Inlet Area from 325 to 335 meshes deep

This proposal would allow new seines that are built to use modern construction techniques. In modern seines a small strip of webbing is used to facilitate remote construction of riblines and corklines. additionally, the corkline border strip is reduces wear on the body web from having a press wheel block. A full depth cook inlet seine fishes to about 60 feet this will add about 15-20 inches of depth. The alternative if a fisherman wants to use border strips is to trim meshes off a full strip of web and sew the edge so it wont fray, a process called salvaging. this is a time consuming practice that creates wasted portions of net. The language in this proposal was taken directly from the PWS seine specifications adopted in 2012 by the BOF in Valdez.

## RE: PROPOSAL 35 Increase the maximum purse seine gear depth in the Cook Inlet Area from 325 to 335 meshes deep

The proposal would allow for the use of prefabricated net building materials making it easier and less expensive to build nets. These border strips also help prevent damage along the corkline and ribline due to them typically being heavier material. This change is not intended to increase harvest but solely to facilitate assembly of nets and increase durability due to block wear along the corkline. This proposal has no upfront costs as most fishermen would simply install a border strip on their next major corkline or ribline replacement.

## RE: PROPOSAL 36 Prohibit the retention of king salmon over 28” in length in the commercial purse seine fishery in the Southern District

KPFA supports the proposal in concept, however the author's logic and articulation is so confusing and poorly spelled out that we have chosen to remain neutral.

## RE: PROPOSAL 36 Prohibit the retention of king salmon over 28” in length in the commercial purse seine fishery in the Southern District

Please oppose this proposal. There is no location in LCI where the seine fishery harvests any notable number of King salmon. The setnet fishery on the south side of Kachemak Bay has a substantial harvest of kings some years and should not be confused with the minimum harvest in the seine fishery. It also has been shown through ADFG genetic studies that very few of the fish harvested in the sport fishery in Kachemak Bay are destined for UCI streams winter or summer.

**RE: PROPOSAL 36 Prohibit the retention of king salmon over 28” in length in the commercial purse seine fishery in the Southern District**

Limiting retention of king salmon to 28" is a hair brained idea

## RE: PROPOSAL 36 Prohibit the retention of king salmon over 28” in length in the commercial purse seine fishery in the Southern District

I am an area H purse seine permit holder and I oppose this proposal. While we do not catch many king salmon in the purse seine fishery, I do not support a requirement to throw them back. Occasionally a king salmon may be rolled into the fish hold with the target species and we do not find it until offload. If you do throw a fish back often times another seine is deployed behind you and it would be caught again. The mortality rate of the discarded fish also seems to make this requirement a waste.



**RE: PROPOSAL 36 Prohibit the retention of king salmon over 28” in length in the commercial purse seine fishery in the Southern District**

LCI Seiners catch a very low number of King Salmon. When otolith testing has been done on King Salmon harvested in LCI a very low percentage of them is from Upper Cook Inlet Stock.

## RE: PROPOSAL 36 Prohibit the retention of king salmon over 28” in length in the commercial purse seine fishery in the Southern District

Kachemak Bay regulations limit recreational fisherman to a total of 5 king salmon during the summer season. The most restrictive bag limit in the state. However, commercial purse seine fishermen are allowed to harvest an unlimited number of king salmon which are considered by-catch. Over the years many of us have witnessed seiners targeting and catching large numbers of kings. The department states the commercial catch is insignificant because the records reflect less than 200 kings landed annually. Simply stated hundreds of kings are making their way into restaurants, retail markets and home freezers and not being reported. Commercial vessels may legally sell to the public provided they have a catcher/seller permit. The regulation states, "A catcher/seller is responsible for completing the fish ticket on the date of the landing for the entire catch and must submit the fish ticket within 7days to the nearest ADF&G office." Basically unless a trooper is present for each dockside offload, transfer to a tender or other vessel, or the kings remain onboard after the offload completed, there is no way to enforce the regulation. The number of kings landed by Kachemak Bay seiners is artificially low. Logic tells us that if the commercial seine fleet is reporting less than 200 kings annually, neither the fleet nor the department should object to the release of any incidental king by-catch. The only reason to object to releasing by-catch is because fishermen are catching far more kings than they have reported. Furthermore if kings 28" or greater were found onboard the regulation could be easily enforced.

## RE: PROPOSAL 37 Create a king salmon management plan with paired restrictions in Kodiak and Cook Inlet commercial fisheries

Please oppose this proposal. There are very few king salmon harvested in any purse seine fishery in LCI. There are sometimes substantial harvests of King salmon in the setnet fisheries in the southern district of CI and shouldn't be confused with the seine harvest. If they need to increase escapement levels to UCI streams there should be more regulation on the sport fisheries in lower and upper CI and not the small harvest in Kodiak and LCI.

# KODIAK SEINERS ASSOCIATION

PO Box 8835, Kodiak, AK 99615

[kodiakseiners@gmail.com](mailto:kodiakseiners@gmail.com)



November 25, 2019  
Alaska Board of Fisheries  
Alaska Department of Fish and Game, Board Support Section

## Re: Opposition to proposal 37

### DEAR CHAIRMAN REED MORISKY AND THE ALASKA BOARD OF FISHERIES,

Thank you for the opportunity to comment on Proposal 37 in advance of the Board meeting for Lower Cook Inlet. The Kodiak Seiners Association (KSA) respectfully requests you oppose this proposal as it poses a hindrance to the effective management and prosecution of the Kodiak Management Area (KMA) salmon fishery.

Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, local Kodiak and Homer businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADFG, the Board of Fisheries and our state legislature.

Proposal 37 which claims Kodiak salmon fisherman are slaughtering Cook Inlet origin king salmon is neither based in scientific fact, nor understanding of the current Kodiak Management plans currently in existence. Pairing restrictions between Cook Inlet and Kodiak during weak king salmon abundance would not result in any measurable success of getting more king salmon into the systems of cook inlet, however it would cripple the historic KMA salmon fishery and lead to potential over escapement issues in a significant number of salmon systems, predominantly in the Westside management area of Kodiak.

KSA would also like to point out that recent genetic studies do not validate the proposer's thesis that Kodiak fisherman are slaughtering Cook Inlet king Salmon. According to Fishery Manuscript Series No. 16-11, titled "Genetic Stock Composition of



the Commercial and Sport Harvest of Chinook Salmon in Westward Region, 2014-2016 tables 41, 42, 43 a yearly average of 3.6% of the kings harvested were of Cook Inlet origin which extrapolates to roughly 260 Cook Inlet origin king Salmon. The effect of this proposal would be a crippling blow to the Kodiak salmon fleet and the communities that depend on salmon production for an unguaranteeable goal of passing 260 additional kings through the KMA with a slight chance they still make it to Cook Inlet. The assumption that restricting Kodiak fisherman with the same restrictions as Cook Inlet fisherman would solve the problem of low king salmon abundance is absurd and factually flawed.

It is our hope the board recognizes the magnitude of the current conservation burden that our fleet has willingly adopted and that any further discussion of king salmon conservation be rooted in science instead of the public misperceptions that have led to undue notoriety for the Kodiak commercial salmon fleet. We encourage a rigorous examination of issues concerning the current scarcity of king salmon in Cook Inlet and the Western Gulf, and hope that the ongoing discussion dispels any prevalent bias against our commercial fishing fleet. This proposal is reflective of the pervasive misconception of the commercial fishing industry in general and the Kodiak area specifically and unveils the difficulties faced by the board in responsibly managing our state's fisheries against a headwind of misguided public perception.

KSA respectfully requests the Board to reject this proposal and oppose proposal 37. 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 continue to apply consistency in designing regulation changes while applying the guiding BOF policies such as the Management for Mixed Stock Salmon Fisheries.

Sincerely,

Nate Rose

President-Kodiak Seiners Association

## RE: PROPOSAL 37 Create a king salmon management plan with paired restrictions in Kodiak and Cook Inlet commercial fisheries

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, KRPGA voted unanimously to support this proposal.

## RE: PROPOSAL 38 Create a king salmon management plan with paired restrictions in Upper and Lower Cook Inlet commercial fisheries

The Kenai River Professional Guide Association has reviewed the following proposals that are before the Board of Fish. We are a 501 c (6) organization located in Soldotna and are devoted to protecting and preserving our national treasure: the Kenai River. Our primary goal is to foster responsible and sustainable Alaska sport fishing opportunities while promoting habitat protection and pro-active management of Kenai Peninsula sport fisheries. Our professional membership is comprised of registered Kenai River sportfishing guides. We actively participate in the fisheries throughout the Kenai Peninsula and the Upper and Lower Cook Inlet. Through discussion and a vote at our Annual Meeting on November 12, 2019, KRPGA unanimously voted to take no action on Proposal 38.

Submitted By  
Adam Lalich  
Submitted On  
11/3/2019 7:06:04 AM  
Affiliation  
f/v YORJIM

Phone  
907 359 1332  
Email  
[fishyorjim@gmail.com](mailto:fishyorjim@gmail.com)  
Address  
box 2583  
Homer, Alaska 99603

5AAC 28.005 Proposal 39

I fish in the Western Gulf, Sand point area in the spring, Are quotas are very small and if pot boats go over even smaller, Its a local fleet and a influx of boats, that would be free to move anywhere in the state would shorten are already short state water cod season more so. Every one is a local boat there , except a couple of us but I been there 12 yrs, The jig fleet there needs this and counts on these fish to get thru till salmon.

If anything make it as Kodiak is now, On june 10 drop the exclusive and super exclusive registrations for jig vessels, and a jig vessel will be able to go to different areas and fish freely on uncaught state water quota

Adam Lalich f/v yorjim



## RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

Chairman Morisky, and Alaska Board of Fisheries Members: The Alaska Jig Association membership unanimously supports Proposal 39 regarding area registration exemptions for vessels utilizing jig gear in the State waters Pacific cod fisheries. The jig fishery is an entry level fishery, particularly conducive to participation by small boats and single operators. The current registration requirements have resulted in stranded GHJ and have also limited the ability of jig fishermen to move seasonally with other fisheries. It is the Alaska Jig Association's position that exempting the jig fleet from exclusive and super-exclusive area registration requirements will be beneficial to the fleet overall, and therefore strongly support Proposal 39. It is expected that more in depth comments will be provided at the Kodiak meeting. Thank you for considering our position on Proposal 39.  
Darius Kasprzak President, Alaska Jig Association

## RE: PROPOSAL 39 Exempt vessels using jig gear from exclusive and superexclusive groundfish registration restrictions

Dear Board Members: Thank you for considering my proposal. I appreciate the BOF adding this proposal to the LCI meeting schedule and I respectfully request this proposal be considered at the Statewide meeting and amended to include the Alaska Peninsula and Chignik management areas. I am submitting a placeholder comment at this time for the LCI meeting and will submit in depth comments for the Kodiak meeting. In a nutshell, the exclusive and super-exclusive registration areas are a solution looking for a problem. There simply is not enough jig gear in the water to warrant these restrictions and the unintended consequences are detrimental to the jig fleet. For example, the quota in Chignik has literally zero participants most years and the quota is given to the pot fleet. The jig fishery is really the only entry level, small boat fishery in the state. I used my jig operation to finance additional halibut quota in IPHC Area 3B. Area 3B encompasses the south end of Kodiak Island, Chignik, and the South Alaska Peninsula. I retain halibut as a bycatch to my jig fishery for Pacific cod. If the federal cod season is closed, I'm unable to fish most of the 3B area in state waters for cod and retain halibut if I've made landings in other areas. If I were to simply jig halibut, I cannot retain Pacific cod above the bycatch limits in place, even though the cod jig season is open. These sort of "handcuffing" regulations on the jig fleet are stifling and detrimental to economic viability. At the same time we are not seeing any benefit. The Chignik quota for example, is routinely rolled over to the pot fleet, removing the GHL from participants from Sand Point and Kodiak who would harvest at least some of the quota if there was not a super-exclusive registration requirement. In light of the potential GOA Pacific cod closure in federal waters, exempting the jig fleet from exclusive and super-exclusive area registration could make the difference between failure and success for some of the participants in the jig fishery. If in the future it appears that a particular area requires regulation to reduce participation, at that time exclusivity may be an option, whether through area registration or limited entry. Thank you for considering my proposal.

Gregory R. Gabriel, Jr. F/V Miss Michelle

**RE: PROPOSAL 44 Amend the Kamishak Bay District Herring Management Plan to remove restrictions to the Shelikof Strait food and bait herring fishery**

Please oppose the proposal. This would allow a fishery on a stock that is in recovery and with little regard for a potentially different biomass.

**RE: PROPOSAL 278 (Formerly ACR 7) Designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod**

Chairman Morisky, and Board of Fish members: I am a commercial Jig fisherman, operating in the Gulf of AK for the past 20 years. It is my position the Aleutian Islands Subdistrict Management Plan should retain non- exclusivity registration requirements for Jig gear. Statewide Jig fishers need the flexibility to move between as many non-exclusive registration areas as they can- as seasonally needed. The small State Jig fleet is generally represented by small vessels and entry level operators, harvesting with low bottom impact and sustainable hand tended gear. Thank you for considering my perspective on this exclusivity matter. Sincerely, Darius Kasprzak F/V Marona

**From:** [Michael Laukitis](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** Public comment  
**Date:** Sunday, November 24, 2019 6:01:34 PM

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## Public Comment from Buck Laukitis

The following is my public comment on proposal 278 during the Lower Cook Inlet meeting in Seward:

I oppose proposal 278. I think the board needs to take a strategic and comprehensive look in cycle at what you want the Adak state water cod fishery to look like. Proposal 278 seemingly fixes one problem and creates several unintended (but entirely foreseeable) problems. The state Adak fishery is complex. The federal Aleutian Islands fishery is even more so. I am a firm proponent of the state water cod fisheries and have helped develop them since their inception in 1996. I believe that piecemeal, emergency proposals such as this don't get us any closer to community and fishery stability, but may make matters worse.

This proposal allocates cod away from pot cod fishermen. Is that the board's intention? State water fisheries in other areas of the state are predominantly pot fisheries with under 60 pot vessels as well as jig vessels. Exclusivity in this proposal only affects pot fishermen (predominantly under 60 foot vessels). It does not limit trawlers or long liners who are federal fishermen and have no state water fisheries to choose from. Requiring a pot fisherman to exclusively fish in Adak at first seems to be consistent with requirements in other state water cod fisheries, but it is ENTIRELY different, because other state water cod fisheries have pot allocations. There is no trawl effort or allocation. For example in Area O or Area M a fisherman knows he/she is only competing for the GHL with other pot boats. Adak is entirely different, so the effects are entirely different. The effect of this proposal on any individual fisherman is even more complicated to predict.

- Limiting the number of pot boats that can participate is contrary to the boards intentions to have low bycatch state water fisheries and to not strand fish. I own two vessels that have participated in the Adak state cod fishery every year there has been a processor in Adak in the last decade —not both vessels in the same year. The current processor in Adak is the third firm we have delivered to. Many years the GHL was not achieved, and we fished until late in May. One year we skipped an entire salmon season and fished in Adak until August. From my experience and from the catch statistics we need to fish intensively in March and early April. This proposal allocates to trawlers at the expense of under 60 pot vessels during that period. Product quality and catch rates are much lower if the season goes on beyond mid April. Fish are available in aggregations for trawlers for only a short period of time (mid- February to mid-March). Good catch rates for pots are higher longer, but they decline and become uneconomical after mid April, Processors typically do not like the quality of the flesh after that point.



One of the reasons the management plan is so complicated is the board whip saws back and forth between wanting to assist the processor in Adak and once they go away needing to fix the stranded fish problem.

This proposal is inconsistent with board actions that prefer low bycatch with participation by predominantly state residents. It will lead to a higher percentage of the GHJ catch being taken by trawlers at the expense of pot fishermen who are limited by the exclusivity regulation. While the Adak section is open these will be 58 foot trawlers. Once the entire Aleutian Islands Subdistrict is open you will hand a sweet bonus “plum” to the out of state 100 foot trawlers who are vertically integrated and will be able to bring their own processing platforms (Katie Ann, Sea Freeze Alaska, Gordon Jensen, etc.) Is this the boards intent?

People might respond “well the trawlers will come anyway” (if we have status quo regulations). This is true, with an important distinction. Under the current management plan there are five or six under 60 pot vessels choosing to start in Adak in January. The cod show up in late February. Six to eight additional under 60 pot cod vessels also show up in early March when fishing improves. If those vessels can’t come as they do now, because they participated in another state cod fishery, there will be less catch by pot vessels than has occurred historically. The under 60 pot share of the entire catch may well be half of what it has been when there is a processor in Adak. Is this the boards intention?

The status of Amendment 113 is unknown. It is unlikely that the sole processor in Adak can predict who their fleet is and what their catching power will be, because the processor doesn’t know the timing of the federal fishery and whether there is any Adak set aside amount. Promises made for markets can be promises broken. Every fisherman in the state is required to secure a market before fishing. But usually a fisherman has choices. I can tell you the processor in Adak couldn’t “guarantee” that my vessel had a market from the time it left Dutch Harbor to the time it got there last year — a three day trip in each direction, which is a very expensive, dangerous and arduous boat ride. What happens if a vessel “drops its card” in Adak then the processor fails or will not take an individual vessel’s fish? There is a lot of leverage in the balance between fishermen/processor weighted towards the processor in this situation. Tax revenue for the community is derived from volume times price. The stated need for this proposal by the proposer seems to focus on the volume side of the equation. What are the effects of this proposal if, in a sole processor market, the VALUE of the fishery declines to a level where the community does not get the benefits you had hoped for?

It is uncertain if this proposal will provide security or stability to the processor or the community of Adak. It will shift the benefits from under 60 pot vessels toward trawl vessels.



There is nothing in this proposal that ensures fish will be landed in Adak. If this proposal becomes regulation vessels will have several options: 1) individual trawl vessels who are not bound by exclusivity regulations will try to obtain a market with the processor in Adak during late February early March. It is likely that under 60 trawl vessels will seek opportunities in Adak given that there is very limited or no trawl opportunity in the western GOA this winter. 2) a group of trawl vessels (rather than trawl and pot vessels) will contract a floating processor to deliver their catch offshore. 3) If GHL remains once the entire Aleutian Islands Subdistrict is open to over 60 vessels, the under 100 foot vertically-integrated, out of state trawlers will bring their company owned processing platforms to mop up the remaining GHL.

The net effect of all of these scenarios is that six or eight predominantly state resident under 60 foot pot boats are not allowed to participate as they have been under status quo regulations.

Respectfully submitted,  
Buck Laukitis

Sent from my iPad

**RE: PROPOSAL 278 (Formerly ACR 7) Designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod**

Dear Board Members, I am opposed to Proposal 278 regarding jig gear. Should the BOF move forward on this proposal, my request would be to exempt jig gear in light of Proposal 39. At the very least, this proposal should be tabled until the Kodiak meeting to provide full and vigorous debate on the merits and whether or not to include jig gear. Thank you for considering my comments. Gregory R. Gabriel, Jr.



# Adak Community Development Corporation

November 25th, 2019

ADF&G Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Proposal 278

Dear Chairman Morisky,

ACDC requests that the Board approve Proposal 278. We also support ADFG's recommendation to include a provision giving managers the in-season ability to designate the AIS as nonexclusive if they determine the GHL will not be achieved. We suggest a trigger of 75% of the GHL taken by June 10th.

The Aleutian Islands state-waters Pacific cod fishery is a nonexclusive registration area. Initially this was due to the remote location of what was then a new fishery, as well as inconsistent processor availability which had sometimes resulted in an under harvest of the GHL. However, a shore-based processor in Adak started processing Aleutian Islands cod in 2017. Since that time, effort has increased and the GHL has been fully harvested by fishermen who have transitioned their fishing operations to Adak.

All other state-waters cod fisheries in the state, except for the EGOA, are currently exclusive or super exclusive. Proposal 278 just aligns the Aleutian Islands regulations with the other GHL cod fisheries.

The size of the GHL in the adjacent Dutch Harbor state-waters cod fishery has expanded a number of times since it was first established in 2014. Despite having a 32 million-pound GHL in 2019, the Dutch Harbor cod fishery closed before the Aleutian Islands fishery (14 million-pound GHL) allowing for an influx of Dutch Harbor pot boats to enter the Aleutian Islands fishery mid-season to "double dip", creating a race for fish.

The proposed action will ease the continued erosion of opportunity for Aleutian Islands fishermen and Aleutian communities dependent on shorebased processing. The unexpected influx of new boats mid-season creates a race for fish which results in an overcapitalized, inefficient, and unsafe fishery which reduces the value that can be obtained from the GHL. Without stability, the only active processor in the region might close which would effectively eliminate cod fishing opportunity for most catcher vessels in the Aleutian Islands.

Thank you for considering our comments.

Sincerely,



Rick Koso, President  
ACDC  
PO Box 1943, Adak, AK 99546



ADF&G Board of Fisheries  
Boards Support Section  
P.O. Box 11556  
Juneau, AK 99811-5526

Re: Proposal 278

Dear Chairman Morisky,

I am requesting that the Board approve Proposal 278, to designate the Aleutian Islands Subdistrict an exclusive registration area for Pacific cod.

Please note that other state water Pacific cod fisheries in Alaska are exclusive or super exclusive. This Proposal will level the playing field by aligning the Aleutian Islands regulations with the rest of the GHL fisheries.

This is an issue of immediate concern. The Area O GHL fishery has expanded a number of times since its inception in 2014. It is now a 32-million pound fishery served by multiple markets. On the other hand, the Aleutian Islands GHL is a 15-million pound fishery with a harvest cap and a trip limits to maximize the value of the Pacific cod resource for harvesters and other stakeholders working in this remote region.

Despite having a 32-million pound GHL, the Dutch Harbor fishery closes before the Aleutian Islands GHL, which results in a large influx of late-season Area O boats moving to the AI Subdistrict.

During the 2018 cycle, the Board had a proposal to address exclusivity in the Aleutians, but it wasn't clear at that time how the Area O change would impact the Aleutians. The 2019 fishery certainly illustrated the impacts, and we ask that the Board now begin to address them through this Proposal.

It is also worth noting that earlier this year Amendment 113 of the federal groundfish FMP was successfully challenged in court, stripping the western Aleutians of guaranteed access to federal waters A season Pacific cod. Increased stability of the state waters GHL fishery is now more important than ever.

Thank you,

Jason Ogilvie, President  
Adak, Alaska



Reed Morisky,  
Chairman  
Alaska Board of Fish

Support ACR 7

Making the Aleutian Islands state waters exclusive for Pacific Cod.

The Aleutian Island's state water cod fishery is the only developed fishery, that doesn't have an exclusive or super exclusive registration. Over the history of state waters fisheries, these designations have been adopted by area to provide stability to regions that faced increased effort and compressed seasons.

We have fished cod since the mid 1980s. We were one of a handful of original boats that caught the qualifying quota establishing a robust state water fishery in the central gulf, which allowed for the state TAC to reach it's 25 %. Over the years, we've pot fished cod in Kodiak, Chignik, Sand Point, Dutch Harbor, Akutan and Adak.

Any state waters harvester that has participated in more than one area or has considered doing so, understands and manages operating under the exclusive/super exclusive designations. This management tool is common. Similar to the state water salmon fishery, it requires the harvester to choose an area/region where they feel they can be the most productive. These choices are driven by multiple factors, including; quota, markets, effort, and proximity to home. These factors are taken into consideration by the individual so they can make a sound business decision.

When you consider fishing the Aleutian Islands, you accept that there is a higher cost of doing business. Your fuel, bait, groceries, and supplies will simply be more costly. This makes it important to be able to project potential effort in the fishery. Up until 2019, the number of participants that crossed over from Dutch Harbor was consistent. The average number over the last seven years was less than one vessel. We would like to highlight that in 2016, where the Departments table 7.1 shows two vessels had crossed over, those vessels were waiting for a processor to show up in Adak. Their original intent was to fish the entire season in the Aleutians and would not have crossed over otherwise. We know this to be accurate as one of those vessels belong to us. In 2019, six vessels crossed over. This was a dramatic increase, it not only shortened the season, but reduced landing tax to the local community, reduced processing workers' hours, added hard ship for the processor in their attempts to a) anticipate length of operations which enables them to offer employment for an expected period of time, b) purchase supplies/groceries/bait/goods for a reasonable determined timeframe.

In the last couple years, several factors have created a new concern for communities in the Aleutian Islands. The fleet in area O has grown and even though their quota share has been generously increased- their season has compressed and is over much faster than the AI fishery. There are several reasons that contribute to this. The AI has a trip limit of 150,000 lbs. This trip limit is intended to enhance quality and provide a steady pace for the fishery. It also prevents this fleet from performing at the rate of it's neighbors in area O. AI also has an unique small trawler participation, trigger dates for additional trawl participation and for pot vessels over 60 feet. All these tools are to prevent stranded fish, but are also complications to the business model for harvester and processor.

The Aleutian Islands harvesters need the exclusive designation to stabilize the dynamics of the fishery. Fishing in Adak only makes sense if you can project overall effort in a meaningful way. We believe last year was an indication of what to expect from vessels participating in Area O.

AFD&G Board of Fisheries

P.O. Box 11556

Juneau, AK 99811-5526

Re: Proposal #278

Dear Chairman Morisky,

I am writing in support of Proposal 278, to designate the Aleutian Islands sub district as an exclusive registration area for pacific cod.

I have been participating in various Aleutian Islands fisheries since 1994, first as a deckhand and now as an owner/operator of a 58 ft. boat.

The Aleutian Islands state water cod fishery is the only developed fishery that does not have an exclusive registration to provide stability in a very dynamic fishery.

In 2019 The Dutch Harbor (Area O) state water fishery was 32 million pounds. This has a stair step mechanism for an increase each year. The Area O fishery has seen considerable growth in the last couple of years. The Area O fishery closed prior to the Aleutian Islands and we saw a huge influx of these boats double dipping into the Aleutian Islands fishery.

The Aleutian Islands GHF is 14 million pounds with a trip limit of 150,000 pounds which was implemented for the harvesters and markets to build their business plans around with a consistent harvest rate for a smaller market. While fishing in the Aleutians we incur a higher cost of business operations due to many factors: the remote

location, all operating expenses such as fuel, bait, and groceries are much more expensive. This is why it is important to be able to project effort on this smaller fishery.

If the current issue continues, it is highly likely that the fleet fishing in the Aleutians will instead choose to start their season in Area O, adding substantial effort there.

The Aleutian Islands GHL would then be prosecuted much differently. It is unlikely that the processor and community members that are dependent on this fishery would be able to survive such a dramatic change. These reasons make it very important to make the Aleutian Island state cod fishery an exclusive registration area and align it with the other GHL pacific cod fisheries state wide.

Please feel free to contact me with any questions at 907-299-2045.

Thank you,

Todd Hoppe

F/v Deliverance

**RE: PROPOSAL 282 (Formerly ACR 12) Extend emergency order authority to restrict stocked waters to no retention in times of low hatchery production or stocked waters contamination**

Please support this proposal. This is a very important proposal to give ADFG the ability open and close areas to protect limited stock returns and stocks of concern.

**RE: PROPOSAL 282 (Formerly ACR 12) Extend emergency order authority to restrict stocked waters to no retention in times of low hatchery production or stocked waters contamination**

PROPOSAL 282 support as long as this does not set a precedent for PNP's to Extend emergency order authority to include restriction of stocked waters State sport fish hatcheries produce .003% of the magnitude of Private PNP Corporation Hatcheries. (approximately 5,000,000 as compared to 1,800,000,000 Billion released salmon). Please amend to ensure this does not set a precedent for PNP hatcheries to be able to institute an emergency order as they asked for in BOF Proposal 203 in 2015. PROPOSAL 203 – 5 AAC 75.003. Emergency order authority. Expand emergency authority to close sport fishing in special harvest areas if hatchery cost recovery goals may not be met.

## RE: Comment on multiple proposals

Hatcheries are not the answer to long term health of our fisheries. I support limiting hatcheries and hatchery production. While hatchery production may enhance financial opportunities for a few fisheries for a limited time, we have little knowledge of long term effects on wild stocks, especially other salmon species than those released from a hatchery.





November 20, 2019

Board of Fisheries

Chairman Morisky and Board Members:

Proposal 22: OPPOSE

Proposal 23: OPPOSE

Proposal 24: OPPOSE

These three proposals seeks to restrict Tutka Bay Lagoon Hatchery operations to the point that it would be forced to close its doors. No PNP hatchery can support itself financially without the ability to recover expenses through a cost recovery program. Successful cost recovery requires a sufficient return of fish to fulfill brood stock needs and a surplus of fish with enough value to cover operating expenses. The goal of all PNP hatcheries is to produce enough fish to cover broodstock needs, cost recovery goals and enough surplus fish to support commercial, sport, and subsistence/personal use fisheries.

The Tutka Bay Lagoon hatchery is still in the development stage of producing enough pink salmon to meet its goals for the commercial seine fishery but already supports dynamic sport and personal use sockeye fisheries in Resurrection Bay, China Poot Bay and Tutka Lagoon. Resurrection Bay and China Poot rival Russian River in popularity with crowds shoulder to shoulder along the beaches and creek banks using snag poles and dipnets. These fisheries are supported by cost recovery in Special Harvest areas of Tutka Bay and Resurrection Bay.

Passage of Proposals 22, 23 and 24 would put an end to these fisheries and any pink salmon seine fishing in Tutka Bay because CIAA would be unable to cost recover enough fish to support itself.

These proposals threaten all PNP hatcheries which provide huge benefits to the citizens and communities of our state.

Emil "Beaver" Nelson  
Box 130  
Homer, Ak 99603

## **E1: PROPOSAL 16 Require a permit to participate in the China Poot Bay personal use dip net fishery**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Support

### **Comment**

The Cook Inlet Seiners Association submitted this proposal to address concerns with the growing popularity of the China Poot personal use dip net fishery. Our members have observed an increasing number of participants in this fishery with anecdotal reports of upward of 40 boats at a time in this confined space.

Cook Inlet Aquaculture Association releases sockeye in Leisure Lake and the current estimates of personal use harvest are very poor. The ADF&G Annual Finfish Management Report contains the following footnote for the China Poot fishery. “ Personal use harvest data for 1979–1981 from permits issued from the Homer office. Data from 1983 to 1995 is from historical sport fish harvest reports (e.g., Mills 1984). Data from 1996 to current is an average of the last 5 years that the data was collected specifically for this fishery”

As board members of CIAA the Seiners Association supports this proposal as a first step in quantifying the

personal use removals in order to evaluate the China Poot sockeye release and return. Every year decisions are made concerning releases in Leisure Lake and it would be valuable to have data to measure the return survival as well as the contribution to common property. Maintaining this project is an expense for CIAA with little chance for cost recovery. Understanding the extent of the use would aid in making important decisions.

Additionally a permit would help ADF&G manage the fishery in terms of knowing how many permits are issued. This would also allow for education and enforcement opportunities to provide a safer, well managed fishery. We request that you support this proposal.

**Sincerely**

**Cook Inlet Seiners Association**

**G1: Proposal 22 Limit the number of each salmon species harvested in cost recovery fisheries**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** - Oppose

**Comment**

Cook Inlet seiners Association believes the Board should oppose Proposal 22. This will change the revenue model for almost all the hatcheries State Wide. Cost recovery is the primary funding source for CIAA. As these hatchery projects develop, the need for the amount of cost recovery required will diminish.

**Sincerely**

**Cook Inlet Seiners Association**

**G2: PROPOSAL 23 Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** Oppose

**Comment**

We oppose this proposal due to the drastic changes to a permit issued under the commissioner's authority. Additionally the proponent provides no evidence that hatchery operations contaminate the lagoon as suggested in this proposal.

**Sincerely**

**Cook Inlet Seiners Association**

## **G3: PROPOSAL 24 Eliminate the Tutka Bay Lagoon Special Harvest Area**

**Name** Cook Inlet Seiners Association  
P.O. Box 130  
Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Oppose

### **Comment**

The Cook Inlet Seiners Association (CISA) strongly opposes proposal 24.

As RC2, ADF&G Staff Comments points out, hatchery releases into Tutka Bay began 42 years ago and the special harvest area (SHA) was used to manage the fishery by emergency order until defined into regulation in 2009 and later in 2014. We support the SHA as defined.

Lower Cook Inlet Seine Permit holders are directly affected by the SHA and are the ones who forgo common property opportunities. CISA members are willing to support the SHA as it stands now as we understand the long term benefits of the hatchery program for the common property fishery.

CISA members question the motives behind this proposal and we oppose it.

**Sincerely**

**Cook Inlet Seiners Association**

**G4: PROPOSAL 25 Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat**



**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** - Oppose

**Comment**

CISA opposes this proposal as this would dramatically reduce the open area in Tutka bay. Otolith sampling has shown the majority of fish in this bay are of hatchery origin. This could limit the availability of fish to be harvested both by common property and cost recovery fisheries.

Anadromous streams in this area already protected by a 500 yard stream closure defined in 5 AAC 21.350(i). This line would put the Tutka Bay Hatchery into closed waters. We believe this proposal may result in inability to harvest pink salmon produced by TBH and may result in economic loss.

**Sincerely**

**Cook Inlet Seiners Association**

**G5: PROPOSAL 26 Close waters near the head of Tutka Bay to commercial salmon fishing**



**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** - Oppose

**Comment**

CISA opposes this proposal as this would reduce the open area in Tutka bay. Otolith sampling has shown the majority of fish in this bay are of hatchery origin. Anadromous streams in this area already protected by a 500 yard stream closure defined in 5 AAC 21.350(i). The mud flat area is only accessible to fishing by ADFG Emergency Order. This could still be opened by EO if the department sees a need to clean up excess hatchery fish in the area.

**Sincerely**

**Cook Inlet Seiners Association**



## **G6: PROPOSAL 27 Eliminate the Halibut Cove Lagoon Special Harvest Area**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** Oppose

### **Comment**

The Halibut Cove Special harvest area is in the CIAA management plan for remote releases of salmon to benefit all user groups.

Kachemak Bay State Park management plan specifically authorizes fishery enhancement opportunities.

This proposal should be rejected as it seeks to eliminate certain people from the use of the state park.

**Sincerely**

**Cook Inlet Seiners Association**



**G7: PROPOSAL 28 Redefine the China Pool and Hazel Lake Special Harvest Area as two separate and discrete Special Harvest Areas**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Support

**Comment**

Cook Inlet Seiners Association supports this proposal that would allow Fish and Game to better manage this SHA separately. During circumstances that F&G may have a concern in the SHA these areas can be managed in a way that would allow greater opportunity to fishermen by not closing down the entire area to harvest.

**Sincerely**

**Cook Inlet Seiners Association**



# H1: PROPOSAL 29 Move the outer boundary line of the Rocky Bay subdistrict further from shore

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Support

## **Comment**

We support this proposal to move the open area of Rocky Bay Sub District further offshore. This would allow surplus fish to be harvested earlier in the run when the fish are higher quality and help prevent over escapement of chum salmon. Often the chum salmon will stage offshore outside of the open area for a long period of time before they will move into the open area of the Subdistrict.

**Sincerely**

**Cook Inlet Seiners Association**



## **H2: PROPOSAL 30 Allow the Kamishak Bay District commercial salmon fishery to be opened prior to June 1 by emergency order**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - cookinletseiners@gmail.com

**Position** \* Support

### **Comment**

The Cook Inlet Seiners Association submitted this proposal in order to give ADF&G management the flexibility to open the Kamishak Bay District prior to June 1st, by emergency order only. In some years an early run to Mikfik Lagoon could be managed with limited time and area openings to target specific runs.

It seems the current regulation allows for a June 1 opening but does not specify if it can be opened earlier. This proposal would clarify that intent.

We request that you support this proposal.

**Sincerely**

**Cook Inlet Seiners Association**

### **H3: PROPOSAL 31 Allow commercial fishing along the beach outside of Ursus Cove Lagoon**



**Name** Cook Inlet Seiners Association  
P.O. Box 130  
Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - cookinletseiners@gmail.com

**Position** \* Support

#### **Comment**

We support this proposal as it will help prevent overescapment into Ursus Lagoon Creeks.

In the last 15 Years from 2005-2019 the beach outside of Ursus Lagoon has only been open to seining in 2 seasons (2005, and 2006).

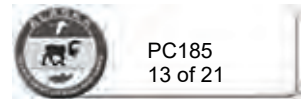
In the last 15 years from 2005-2019 the Maximum SEG has been exceeded in 10 of those years.

Changing the closed waters of Ursus Subdistrict to the proposed coordinates will help prevent this over escapement from continuing. The proposed coordinates are more than 500 yards from any freshwater of anadromous salmon streams.

**Sincerely**

**Cook Inlet Seiners Association**

#### H4: PROPOSAL 32 Repeal closed waters in China Poot Bay



**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Support

#### **Comment**

The current closure line in China Poot Bay was put into regulation to protect spawning pink salmon in China Poot Creek. The pink salmon return and spawn in August. The closure line was put into regulation before Cook Inlet Aquaculture Association started planting Sockeye into the system. The sockeye salmon are not able to swim to China Poot Lake due to a waterfall blocking their passage. These fish need to be harvested to prevent straying and to allow the pink salmon to use the stream in August when they return.

When the sockeye were planted ADFG changed the management strategy in China Poot Bay to allow the seiners and CIAA to harvest these fish both in the common property and cost recovery fisheries. The closed water regulatory line was often repealed in the beginning of the fishing season and it was reinstated around August 1 to protect the returning pink salmon.

In more recent years ADFG has stopped using this management strategy and is keeping this area closed for all or most of the season. This is creating a situation where there are more sockeye getting into China Poot Creek than can be efficiently harvested by the Sport and PU Dipnet Fishery.

A compromise would be to have the closed water line in effect only after August 1 each year to protect the spawning pink salmon as originally intended.

**Sincerely**

**Cook Inlet Seiners Association**

## **H5: PROPOSAL 33 Close the area within a one-mile radius of the end of the Homer Spit to commercial salmon fishing**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Oppose

### **Comment**

First, The China Poot SHA already reaches out into Kachemak Bay towards Homer Spit approximately one mile. This proposal would create a closed area on the North side of the bay and only leave a one mile corridor of water open to fishing in the middle of the bay. Lower Cook Inlet seiners are already quite restricted in the areas we are allowed to fish, and generally are allowed only 48 hours per week of fishing time. To close off more of the small area we have when Sockeye and Pink Salmon are coming into the bay would be unnecessarily restrictive.

Also, ADFG regulations allow for closure by Emergency Order if necessary. If the biologist for our area thinks the seine fleet is having an impact on the Chinook returning to the Nick Dudiak Fishing Lagoon, he or she has the authority to close that area. In recent years, only a few seiners have made sets off of Homer Spit and it has not been fished heavily enough to have an impact on the fishing hole or require ADFG to call for a closure.

As far as traffic being a concern, there is boat traffic throughout all of Kachemak Bay and other popular areas of Alaska where commercial





fishing takes place. Valdez, for example, has 100+ commercial fishing vessels competitively fishing in an active marine highway. Commercial fishing vessels are required to have the proper day signs and lights to identify themselves. It is the responsibility of all boaters to be aware of their surroundings and navigate accordingly and there is no reason all vessels can't coexist safely.

**Sincerely**

**Cook Inlet Seiners Association**



## **H6: PROPOSAL 34 Reduce the maximum length of seine gear in the Cook Inlet Area to 150 fathoms**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** - Oppose

### **Comment**

Restrictions to the Lower Cook Inlet seine to 150 fathoms would greatly reduce the effectiveness of the Lower Cook Inlet Seiners. Lower Cook Inlet seiners are currently managed effectively by the Fish and Game personnel through area time and area on a regular basis. The fleets is currently able to harvest fish numbers efficiently in all areas with the current gear length. Currently Lower Cook Inlet seiners are restricted to 48 hours per week when targeting red and pink salmon in Lower Cook Inlet, Kachemak Bay area. Reducing the length of Cook Inlet Seines would be detrimental in the fleet ability to effectively harvest targeted species during the limited time allotted. The fleets ability to harvest pink salmon in large numbers for common property, and cost recovery in some locations of the regulatory area would become problematic and could very well lead to over escapement and excess numbers of hatchery fish returning to waters outside seiners reach. In addition, the cost of retrofitting a seine to the shorter length would be a heavy burden on the fleet financially. It is not a simple process to just shorten a seine. Substantial cost and time would be involved to adjust seine in order to comply with this law.

**Sincerely**

**Cook Inlet Seiners Association**



## **H7: PROPOSAL 35 Increase the maximum purse seine gear depth in the Cook Inlet Area from 325 to 335 meshes deep**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** \* Support

### **Comment**

The proposal would allow for the use of prefabricated net building materials making it easier and less expensive to build nets. These border strips also help prevent damage along the corkline and ribline due to them typically being heavier material. This change is not intended to increase harvest but solely to facilitate assembly of nets and increase durability due to block wear along the corkline. This proposal has no upfront costs as most fishermen would simply install a border strip on their next major corkline or ribline replacement.

**Sincerely**

**Cook Inlet Seiners Association**



**I2: PROPOSAL 36 Prohibit the retention and sale of king salmon greater than 28 inches in length by commercial purse seine permit holders in the Southern District of Lower Cook Inlet 5**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - cookinletseiners@gmail.com

**Position-** Oppose

**Comment**

Lower Cook Inlet is managed as a non intercept fishery, as F&G commented LCI Seiners catch a very low number of King Salmon and unlike Kodiak LCI does not have harvest areas with natural King Salmon returns. This proposal would only add regulation and complexity to the Fishery. Due to these reasons and we oppose the proposal.

**Sincerely**

**Cook Inlet Seiners Association**

## **I2: PROPOSAL 38 Create a king salmon management plan with paired restrictions in Upper and Lower Cook Inlet commercial fisheries**

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position-** Oppose

### **Comment**

CISA is opposed to this proposal. This proposal does not specify gear type and would seem to make retention of king salmon illegal. Seine harvest of king salmon in the LCI is extremely low, and there is currently a retention sport harvest and charter fishery targeting these kings.

As seiners it is extremely difficult to identify species of salmon as they are loaded on the vessel as we are often loading fish directly into our fishholds to reduce the weight on deck. If a king salmon is rolled into the fish hold we may become in violation of law without our knowledge.

Due to the nature of Seine fishing, where we are setting sequentially one after another at a given point, a king salmon released from a seine is likely to be caught in multiple seines in one day. We have a serious concern that this could increase mortality.

LCI has no directed king salmon fishery. Our catch numbers are typically low in an area that has many charter and sport fishermen targeting the species.

**Sincerely**

**Cook Inlet Seiners Association**

**J6: PROPOSAL 44 Amend the Kamishak Bay District Herring Management Plan to remove restrictions to the Shelikof Strait food and bait herring fishery**



PC185  
21 of 21

**Name** Cook Inlet Seiners Association

P.O. Box 130

Homer, Ak 99603

**Organization** - Cook Inlet Seiners Association

**Email Address** - [cookinletseiners@gmail.com](mailto:cookinletseiners@gmail.com)

**Position** - Oppose

**Comment**

The herring in Kamishak bay have been known to spend winters in upper Shelikof strait. The Kamishak bay herring fishery has not been opened recently due to low abundance. Allowing fishing on these stocks could hamper the recovery of this already diminished stock.

**Sincerely**

**Cook Inlet Seiners Association**



November 25, 2019

Chairman Reed Morisky  
Alaska Board of Fisheries  
<https://adfgcomments.psmfc.org/Meeting/Details/1084>  
Lower Cook Inlet meeting comments

**RE: COMMENTS ON LOWER COOK INLET BOARD OF FISHERIES PROPOSALS**

Chairman Morisky and members of the Alaska Board of Fisheries,

Icicle Seafoods is one of the largest and most diversified seafood companies in Alaska, with facilities and operations throughout the state including Southeast, Prince William Sound, Cook Inlet, Kodiak, Bristol Bay, Bering Sea and Aleutian Islands. Our processing facilities and our fishermen depend on regulatory stability and sustainable management of fisheries resources. Icicle Seafoods has a major presence in Lower Cook Inlet. We employ nearly 400 people at our processing facility in Seward and our operations expand to Homer with a fleet office. We welcome the board and staff to Seward and appreciate the opportunity to comment on Lower Cook Inlet (LCI) proposals submitted to the Alaska Board of Fisheries (BOF). Icicle Seafoods will be present at the upcoming meeting and *we look forward to reading the not yet released ADF&G comments on proposals to determine if additional comments need to be made.*

With a processing facility that operates nearly year-round in Seward and fleet operations office in Homer, Icicle Seafoods is a significant component and contributor to the local and regional economy and surrounding communities. We process salmon, halibut, sablefish, cod, rockfish, and other species. Our Seward processing facility employs 320-340 processing workers at the peak of the salmon season, 100 processing workers during the shoulder seasons, and 50-60 office, support, and maintenance workers. Many of the year-round employees live in Seward because of their long-term employment at Icicle Seafoods. Additionally, Icicle provides critical access to seafood for locals, visitors and restaurants in Seward. Icicle also produces seafood for the Anchorage market, with the majority being salmon. Due to our fish oil and meal plant, we are a nearly zero-discharge facility with the goal of full utilization of the waste stream (head, guts, etc). By nearly fully utilizing all parts of the fish we process, we create additional jobs as well as minimizing our impact on the environment.

**General comments on BOF proposals:**

Our ability to operate a processing facility is fully dependent on sustainable fisheries management. ADF&G should be allowed to manage fisheries based on the best available science and EO authority where appropriate. ADF&G should maintain management flexibility to help benefit all users of Alaska's fishery resources. ADF&G has demonstrated their commitment to ensuring salmon stocks are protected and will continue to put appropriate management measures in place without jeopardizing the sustainability of the resource.

Salmon is an important part of our business plan. Attempts to curtail salmon harvest without merit result in a loss to our facility and the community and surrounding area, as well as less salmon available in the Anchorage market. Icicle Seafoods is a company that works hard to supply Alaskans who may not have the time, money, or resources to harvest their own fish, or they may choose to supplement their catch with additional fish to fill their freezer. Due to the access that we help supply, both Alaskans and visitors to our state can reliably find Alaska-harvested seafood on local and Anchorage menus.

We are supportive of sustainable hatchery operations in Alaska and oppose efforts to reduce hatchery production or access without basis or legitimate merit. Attempts to curtail hatchery production just to harm



one sector will undoubtedly impact the other user groups and the ability of Alaskans to access salmon. Hatcheries provide crucial access to personal use, sport, subsistence and commercial salmon harvesters in Alaska. As our past comments have outlined, we support the ongoing efforts to provide factual data regarding salmon hatchery production in Alaska including research that is ongoing as a result of the Alaska Hatchery Research Project (AHRP). As that project continues, we support the data gathered and presented by legitimate scientists and researchers, and we support scientifically verified and peer reviewed data. This research project will provide crucial data and help provide clarity on the multitude of unverified scientific “facts” that are being distributed to confuse the general public. *Recently, ADF&G has presented current and relevant information regarding salmon hatchery production in Alaska and we encourage an update of that presentation on a regular basis to help inform new board members and the public.*

**We are opposed to the following hatchery proposals, 22-27:**

Most hatchery proposals are submitted without a full understanding of the issue being addressed or are based on incorrect or unverified information. Just like all BOF proposals, hatchery proposals should be carefully considered to analyze impacts to all users. Additionally, there is a robust process for developing, permitting, and continuing hatchery operations that is based on rigorous analysis and input from ADF&G and the public. Many of the hatchery proposals that are submitted are an attempt to circumvent that process. Attempting to restrict commercial ability to harvest salmon through hatchery production would limit personal use, sport, and subsistence harvest as well. All user groups are dependent on hatchery production as an important source of salmon. Icicle Seafoods has submitted multiple comments on the various attempts to curtail hatchery salmon operations over the past two years. We urge the BOF to be very cautious when considering proposals that frequently “cherry pick” scientific information to justify baseless arguments. We encourage the continued support for the ongoing Alaska Hatchery Research Project (AHRP) which was designed to analyze potential interactions between hatchery and wild salmon in Alaska.

**PROPOSAL #22, OPPOSE - Limit the number of each salmon species harvested in cost recovery fisheries.** One of the fundamental successes of the hatchery program is cost recovery. Hatchery operations are funded through cost recovery efforts. By changing the entire structure of cost recovery and eliminating revenue, the proposer would be limiting personal use, sport, and subsistence harvest. All user groups are dependent on hatchery production as an important source of salmon.

**PROPOSAL #23, OPPOSE - Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity.** The proposal is based on emotion as opposed to facts and provides little to no supporting evidence to support the claims made. All user groups are dependent on hatchery production as an important source of salmon.

**PROPOSAL #24, OPPOSE - Eliminate the Tutka Bay Lagoon Special Harvest Area.** Tutka provides an important opportunity for cost recovery efforts. Cost recovery funds go to support hatchery projects that benefit all users of salmon resources including sockeye salmon that highly benefits resident anglers.

**PROPOSAL #25, OPPOSE - Close waters of Tutka Bay southeast of 59 degrees 26.50' N. lat.** The proposer attempts to close waters in Tutka despite the existing 500 foot anadromous stream buffer at the head of the bay. The proposal is based on emotion as opposed to facts and provides little to no supporting evidence to support the claims made. ADF&G successfully manages this area to ensure the sustainability of non-hatchery salmon.

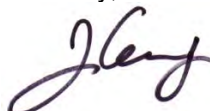
**PROPOSAL #26, OPPOSE - Close waters near the head of Tutka Bay to commercial salmon fishing.** The proposer attempts to close waters in Tutka despite the existing 500 foot anadromous stream buffer at the head of the bay. The proposal is based on emotion as opposed to facts and provides little to no supporting evidence to support the claims made. ADF&G successfully manages this area to ensure the sustainability of non-hatchery salmon.



**PROPOSAL #27, OPPOSE - Eliminate the Halibut Cove Lagoon Special Harvest Area.** ADF&G successfully manages this area to ensure the sustainability of non-hatchery salmon and hatchery raised chinook salmon. The proposal is based on emotion as opposed to facts and provides little to no supporting evidence to support the claims made.

Once again, we extend an invitation to any member of the board to visit our facilities or any of our statewide fisheries. Thank you for the opportunity to comment, please reach out if you have any questions.

Sincerely,



Julianne Curry  
Public Affairs Manager  
Icicle Seafoods  
[Julianne.Curry@icicleseafoods.com](mailto:Julianne.Curry@icicleseafoods.com)  
Cell 907.518.1822

My Name is Josh Wisniewski I live in Seldovia Village, my mailing address is PO Box 20 Seldovia, Alaska, 99663.

**I support of Lower Cook Inlet subsistence fishing proposals 18, 19, 20**

**I support Lower Cook Inlet Commercial s salmon hatchery proposals 22, 23, 24, 25, 26, 27**

**I support other Lower Cook Inlet Commercial Fishing Proposals 29, 31, 34, 39**

I am a commercial fishing permit holder. I own a Cook Inlet set net permit and I fish set-net sites in the Barabara subdistrict in Kachemak Bay in the Lower Cook Inlet District. I also commercially fish halibut in Kachemak Bay which is part of Area 3A here in Lower Cook Inlet. Additionally, I participate in Lower Cook Inlet subsistence, fisheries for salmon, halibut rock fish and tanner crab and other shellfish subsistence fisheries.

I am also a cultural anthropologist and completed all of my education here in Alaska, including my Ph.D. in anthropology at the University of Alaska, Fairbanks. I been studying issues related to subsistence and commercial marine harvesting as well as traditional and local ecological knowledge in Alaska and Washington State for over 15 years. I put myself through school in part by commercial fishing here in Lower Cook Inlet and participating in the maritime trades in this area.

I first started participating in Lower Cook Inlet fisheries in 1994 seining for salmon during the summer and set netting after the seining season slowed down as well as halibut fishing. I knew I wanted to be a Kachemak Bay commercial skiff fisherman the first time I walked through Homer Harbor, and I knew Seldovia was home the first time I crossed Kachemak Bay. In addition to fishing here I spent two seasons tendering to set net as well as for Lower Cook Inlet seiners operating in Kachemak Bay. I have also participated in commercial and subsistence fisheries in other parts of the state including owning and operating my own salmon troller and participating in herring egg subsistence harvests in Sitka Sound.

Set netting is the oldest continuously operated commercial fishery in Kachemak Bay. It is the lowest impacts and most sustainable fishery in the Lower Cook Inlet fishing district, and contributes directly to the mixed cash/subsistence economy for many Seldovia, Port Graham and Nanwalek families. Our low impact skiff fishery is perfect scaled for Kachemak Bay and is a true artesian wild-salmon fishery with uniquely hung nets, hooks and jiggers for how they are configured when set.

We predominantly harvest wild sockeye that circulate through Kachemak Bay en-route to spawning streams. Additionally, we harvest all other pacific salmon species as well. Our season begins the first of June and following Copper River we harvest some of the first sockeye to be available for fresh markets. Over all the Kachemak Bay set net fishery is fairly small. Typically, the collective Lower Cook Inlet set net harvest is under 30,000 sockeyes annually based on the 10-year average. Despite it's relatively small take our fishery is a true community fishery and is a critical economic contributor for Seldovia, Nanwalek and Port Graham, the three communities that participate in subsistence fisheries in Kachemak Bay. Our commercial set net fishery directly supports local subsistence fisheries, and the economic and socio-cultural well-being of many area families. As a small fishery I believe ADF&G commercial fisheries management here places managerial priority on the larger boat salmon fisheries. In doing so it does not adequately address how management decisions in support of the seine fishery impact the set net fishery.

I am writing in support of the following subsistence proposals.

**Proposal 18.** The current Seldovia area subsistence salmon fishing season closes May 30. This fishing season is open largely during a period when few salmon are present and closes prior to the opening of the Lower Cook Inlet commercial set net season when sockeye salmon are present in Kachemak Bay. Current limits in the Seldovia area subsistence set net season effectively eliminates opportunities and as a result the amount reasonably necessary for subsistence (ANS) is not met in our community. The duration of this season is not congruent with the seasonal timing arrival of salmon. Extending the season would allow for increased effort by subsistence fishermen. A.S. 16.05.258. SUBSISTENCE USE AND ALLOCATION mandates subsistence needs be met. This is not happening under current regulatory limitations. More residents would participate in the fishery if they were able to set gear when fish were present. Lengthening the season to June 30 would enable me to harvest salmon for myself and other families I provide fish for.

**Proposal 19.** The current area open to subsistence set netting in the Seldovia subsistence set net area is too small to support a community subsistence fishery that allows our community to harvest the amount reasonably necessary for subsistence. A.S. 16.05.258. SUBSISTENCE USE AND ALLOCATION mandates subsistence needs must be met prior to consideration of opening a commercial fishery. The area currently open for subsistence set net fishing is not very well suited for multiple people to set nets there and the number of actual sites where gear can effectively be deployed is highly limited within the existing zone where it is allowed. This environmental limiting factor reduces the number of people who participate in this fishery. This results in limiting harvest opportunity, falsely suggesting decline in effort. Expanding the areas where residents can fish would allow more Seldovia families to participate in the fishery. As a subsistence fisherman I would directly benefit from this proposal. Expanding the area where fishing is allowed would provide me more fishing time, and allow me to catch fish for my family and other families I provide fish for.

**Proposal 20.** I support proposal 20 changing the legal distance between subsistence set-net fishing gear from 600 feet to 300 feet. The geographic area open to subsistence set netting is limited. Within that area there are limited areas where gear can be effectively fished. This results in limited effort due to lack of room. The result is an inaccurate evaluation of the importance of this fishery to the community. Expanding the area where community members can fish would likely result in an increase in participation. It would also further distribute the areas where existing subsistence set net fisherman set gear likely resulting in a higher success rate and increasing the likelihood for more households to meet the ANS in Seldovia. A.S. 16.05.258. SUBSISTENCE USE AND ALLOCATION mandates subsistence needs be met, this is not currently happening do to limitations in available area to set nets. I would benefit form this proposal. As a more recent participant in this fishery adjusting the distance between subsistence set nets it would provide me more opportunity to set gear and not come into conflict with established Seldovia subsistence fishers all vying for the same limited number of available subsistence sites . This proposal would help me meet the subsistence needs of my family and other families in Seldovia I help provide fish for. It would support a Seldovia subsistence fisheries and not pose a conservation issue.

I support of the following commercial fishing proposals

**Proposal 22** I support proposal 22. As a Lower Cook Inlet commercial set net fisherman I pay an aqua culture enhancement tax on all of my deliveries. This proposal seeks to limit the quantity of fish private

not for profit corporations can harvest for cost recovery prior to opening a common property fishery. This proposal seeks to address adverse impacts that the current levels of pink salmon production are having on the marine ecosystem. As proposal 22 states:

"A limit is needed in order to eliminate the unintended adverse consequences of hatcheries producing too many pink salmon solely for the purposes of fulfilling its revenue targets and to otherwise serve the overall statutory goal of hatcheries, which is to restore and enhance depleted fish populations for the common fisheries."

As a lower Cook Inlet set net fisherman I do not benefit from Tutka Bay Lagoon pink salmon production. Pink salmon straying events wherein pink salmon stray into non-natal spawning streams or contaminate wild systems directly impacts the viability of my fishery Hatchery production across Alaska and here in Cook Inlet by Cook Inlet Aquaculture Association (CIAA) largely concentrates production on pink salmon. As Pink salmon are the easiest to rear pink salmon production provide a likely source of cost recovery for their production.

However, this has resulted in a dramatic increase in the number of pink salmon produced beyond their historical abundance, disrupting the salmon species composition in ocean environment. This in turn has resulted in high value wild and hatchery species of salmon such as sockeye, king and Coho being forced to compete with a highly disproportionate number of pink salmon in the high seas and inshore Alaskan waters, contributing to a decline in size and abundance of these high value salmon. This directly impacts my economic bottom line in favor of another gear type that predominantly harvest pink salmon. Further suggesting a bias of ADF&G management supporting hatchery production of pink salmon at the expense of higher value species targeted by other small boat commercial harvesters.

This scale of pink salmon production to support meeting hatchery corporation revenue targets benefits the aquaculture association and processors and a small group of fishermen to the detriment of others. This directly impacts wild-salmon fisherman like myself and other set net fishermen in Lower Cook Inlet and other wild salmon fisherman in other fishing districts across Alaska. This issue is compounded by climate change and ocean acidification resulting in a decline in the productivity of the North Pacific

Concurrently it is inconsistent with Section 15 of Article VIII of the Alaska State Constitution which identifies there is no exclusive right to a fishery by any one group to avoid one user group being able to monopolize an in-common resource. Thus ADF&G cannot manage one fishery to the detriment of others, which is why limitations on hatchery cost recovery are important.

This further supports the need for limitations on cost recovery to control pink salmon hatchery production and ensure common property fishing opportunities in order that hatchery production focus on the restoration and enhancement of depleted fish populations for common fisheries not hatchery production that directly contributing to the depletion of wild fish populations. Therefore, as a Lower Cook inlet commercial set net and halibut fisherman and as a subsistence fisherman I support proposal 22

**Proposal 23.** As a Lower Cook Inlet set net fisherman and Kachemak Bay area commercial halibut fisherman I support proposal 23. This proposal seeks to address the ecological impacts of the Tutka Bay Lagoon hatchery. Specifically, regarding the ecological integrity of the lagoon, located in Kachemak Bay

State Park and its role as part of the State designation of Kachemak Bay as critical habitat, to support functional ecosystem of Kachemak Bay for sustainable commercial fisheries.

This proposal addresses both the historic and expanding levels of pink salmon production in Tutka Bay Lagoon have had adverse impacts on the ecological integrity of the area, including wide spread straying of fish from Tutka Bay Lagoon to wild salmon systems at the head of Tutka Bay, and the direct impacts on the Tutka Bay lagoon in Kachemak Bay State Park. Tutka Bay lagoon, is a small and shallow lagoon estuary system in Tutka Bay. It has limited tidal access through a narrow channel which also limits flushing of fish effluence produced by years of operation. Tutka Bay Lagoon has been designated as critical habitat and was designated in the ADF&G habitat management Atlas and Critical Habitat Management Plan as Dungeness crab reproduction area, shrimp spawning area and critical herring habitat. These are important species for salmon and other fin fish in Kachemak Bay. Both the shrimp and crab fisheries of Kachemak Bay were of historic magnitude with millions of pounds harvested annually. *ADF&G Fishery Management Report 17-26 2016 Lower Cook Inlet Finfish Management* page 73 Appendix A-3 provides an assessment of historical pre-hatchery pink salmon harvest in the southern district, where Tutka Bay Lagoon is located, which included harvest data from when both Kachemak Bay shrimp and crab fisheries were prolific. Evaluation of that data shows an over-all decline in pink salmon abundance in the Southern District following the development and operation of the Tutka Bay Lagoon hatchery. This suggests that not only is ongoing pink salmon production potentially limiting successful recovery of some species historical commercial harvest abundance, but has likely been a factor contributing to declining pink salmon abundance in the Southern District more broadly. This violates Section 4 of Article VIII of the Alaska Constitution which identifies resources are to be managed based on principle of sustained yield as well as with Alaska Statute AS16.05.258. prohibiting a monopoly over a common property resource. If a resource is being unsuccessfully propagated for a small user group at the expense of ecological integrity of the marine environment and harvest opportunities for other user groups then it is violating Alaska state law.

As a lower Cook Inlet fisherman who pays an aqua-culture tax I do not support the operation of the Tutka Bay Hatchery. I do not benefit from it in terms of increased salmon to target in my fishery. Concurrently excessive pink salmon production in conjunction with staying of Prince William Sound fish into Kachemak Bay reduce set net fishing effectiveness at targeting high value sockeye. Several of my set net fishing neighbors have at different times to pull their fishing gear in Kasitsna Bay the Tutka Bay subdistrict due to over-abundance of pink salmon that precluded them from fishing for sockeye and resulted in economic loss due to the low economic value of pink salmon. Set net fishermen who have fished this area since the early 1960's reported that this is a new occurrence following expanded pink salmon production.

As a wild salmon fisherman, I support marine conservation, and support measured hatchery production and enhancement of high value salmon species such as sockeye, Coho and chinook when done in a manner that enhances wild stocks and habitat and does not produce adverse impacts to the marine ecosystem or result in fish that are not available for common property fisheries because they are all taken for purposes of cost recovery.

Lastly the impact of pink salmon production on Tutka Bay, Tutka Bay Lagoon and the Kachemak Bay critical habitat area does not benefit the recovery of crab and shrimp. Both of which I would harvest for subsistence or commercially if abundance permitted. Concurrently, Kachemak Bay as a relatively

shallow estuary environment and critical habitat for multiple species including wild salmon, other fin fish and shellfish is undergoing environmental stresses. The combination of these factors in conjunction with the role of Kachemak Bay State Park as a wilderness park render pink salmon hatchery production in Tutka Bay lagoon as wrong. It is bad management, it is not sustainable and it directly impacts other fisheries.

As a Lower Cook Inlet commercial and subsistence fisherman I do not believe continued pink salmon production in Tutka Bay lagoon supports my fishery. Further I believe it is having a negative effect on the broader Kachemak Bay ecosystem which impacts the suitability of all other Kachemak Bay fisheries. Therefore, I am in support of Proposal 23

**Proposal 24** I support Proposal 24. I oppose the presence of an exclusive use area in marine waters located within the external boundaries of Kachemak Bay State Park. The intent of the establishment of the Tutka Bay lagoon hatchery was to enhance depressed stocks. At the time it was developed pink salmon populations were not depressed in the Southern District. ADF&G Fishery Management Report 2016 Lower Cook Inlet Finfish Management Report page 73 Appendix A-3 provides an assessment of historical pre-hatchery harvest levels from prior to operation of Tutka Bay lagoon hatchery suggesting pink salmon abundance in the southern District of Lower Cook Inlet this assessment illustrates a general decline in wild pink salmon abundance following the initiation of pink salmon hatchery production. Allowing Tutka bay to remain open to fishing avoids the un-necessary buildup of an over-abundance of fish that often go unharvested. In 2015 up 75% of Tutka Bay Lagoon Hatchery produced pink salmon were documented in wild salmon stream system. As a Lower Cook Inlet commercial and subsistence set net salmon fisherman I pay an aquaculture enhancement tax. I strongly oppose that my tax money supports actions that I as a fisherman do not benefit from. Furthermore, as a Lower Cook Inlet Fisherman paying an aquaculture enhancement tax I directly oppose my mandatory tax being used to engage in hatchery practices that are destructive to the ecological integrity of the area I fish in. This ultimately impacts my economic bottom line. Please remove this SHA from the Kachemak Bay State Park and Critical Habitat Area.

**Proposal 25** I support Proposal 25. This proposal seeks to close waters at the head of Tutka Bay. Tutka Bay is a silled fjord of shallows and deeps recognized for its high productivity located in the essential habitats of legislatively designated (LDA) Kachemak Bay Critical Habitat Area, State Park lands and waters; NOAA Habitat Focus Area; and The National Estuarine Reserve. Art VIII Sec 7; AS 38.04.070; AS 41.21.131; AS 41.21.990; AS 16.20.590; AS 16.21.500; AS 16.20.580; AS 16.05.020; AS 16.05.050; AS 16.05.255; AS 16.20.520; AS 16.20.530; 5 AAC 95.610. The head of Tutka Bay is critical rearing habitat for crustaceans and larval finfish. Historically the boundary for seining in Tutka Bay was located 1/2 mile from the head of Tutka Bay. Concurrently wild fish in these wild systems move into the freshwater systems at the head of Tutka Bay on the tide. It is critical for escarpment that seining not be allowed in area wherein a major proportion of the run can be harvested in a seine set. Because this area is part of a Critical habitat and a critical component of the ecological functionality of the broader Kachemak Bay estuary system which is an important part of the broader role of Kachemak in the Lower Cook Inlet and Gulf of Alaska ecosystem. As a Kachemak Bay commercial and subsistence fisherman

**Proposal 26** I support Proposal 26. Proposal 26 parallels Proposal 25. This proposal seeks to return the boundary for commercial seining in Tutka Bay to 1/2 mile from the head of Tutka Bay. This is consistent where I commercially seined for salmon in Tutka Bay in the 1990s. This proposal protects critical habitat

including habitat for salmon at the head of Tutka Bay and helps maintain the ecological functionality of Tutka Bay without limiting commercial purse seine fishing opportunities in Tutka Bay

In addition to the proposals identified above I also support commercial fishing proposals 27, 29 31 34, 39. **Proposal 27** identifies Halibut cove as critical habitat that is not conducive to commercial hatchery production. This is based on several factors. Its geographic location in Kachemak Bay State Park, the shallow depth of the lagoon and narrow mouth allowing limited flushing and access, and its role as critical habitat. **Proposal 29** seeks to adjust the boundary for seining in the Rocky Bay subdistrict outward to allow boats to more effectively fish in the subdistrict. I have fished in the Rocky Bay subdistrict I believe this boundary adjustment would support the operations of commercial seine gear targeting Lower Cook Inlet salmon stocks and does not present a conservation issue. **Proposal 31** seeks to adjust boundary to allow for commercial seining on the beach outside of Ursus Cove Lagoon. This would allow for additional fishing opportunities for the Lower Cook Inlet purse seine fleet to target chum salmon returning to a Lower Cook Inlet stream system in the Ursus Cove subdistrict. This boundary adjustment would provide fishing opportunity and present a conservation issue **Proposal 34** seeks to limit the size of purse seines to 150 fathoms in order to limit the harvest of Upper Inlet salmon by the Lower Inlet purse seine fleet and manage the Lower Cook Inlet commercial seine fishery to target Lower Inlet salmon stocks.

Lastly, I wish to emphasize to the Board of Fisheries that as both a small boat commercial fisherman and subsistence harvester I believe that despite the propensity of us fisherman to retreat into our respective gear type camps that all fishermen want the same thing which is a health ecosystem supporting vibrant healthily stocks, the opportunity to fish on them and the assurances these fisheries will be managed to ensure there will be equal opportunities for subsequent generations. All of our fisheries, both wild and hatchery based including, commercial, subsistence, personal use and sport are ultimately dependent upon the health and the integrity of our marine ecosystem. You are all aware that this system is currently undergoing stress and adjustment due to the impacts of climate change and ocean acidification. These realities further mandate that the Board look beyond the politics of fisheries and consider that all fisheries must be appropriately scaled to unique environment and carrying capacity of the setting wherein they take place, and the unique and challenging environmental adjustments our marine environment is experiencing. This I believe should a guiding principle and provide the empirical foundation for management decisions. Marine conservation to support the long-term viability of our fisheries is our collective responsibility as Alaskans.

Thank you for review and consideration of these comments and thank for your service on behalf of all Alaskans.



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10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

**Proposal 22: Oppose.** Proposal 22 is a dangerous solution to a potential problem that is already being addressed through the ambitious and laudable Alaska Hatchery Research Project (AHRP) which involves the investment of tens of millions of dollars in order to address issues relating to Alaska's world-class hatchery program for the benefit of wild fish stocks, and Alaska's economy. This proposal would undermine Alaska's economy and reduce our commercial fishing harvest while increasing fishing pressure on wild stocks, a losing proposition across the board.

This proposal is based on flawed assumptions regarding how hatchery output is determined and how hatchery budgets are developed. The proposer assumes that rising budgets drive increases in output, and this is not the case. Hatchery output is determined through an open and participatory process utilizing ADFG permitting and regional stakeholders in a Regional Planning Team (RPT) that reviews and approves or denies changes to hatchery output. The Native Village of Eyak participates in the Prince William Sound RPT, and supports the RPT process.

Hatchery budgets are developed to accommodate hatchery output, but higher budgets do not necessarily reflect higher output, and often there are many fixed costs associated with maintaining a remote facility of this scale that do not vary with output, and rise over time. Moreover, our hatchery infrastructure is aging and maintenance (sometimes deferred), critical equipment replacement, compliance with ever changing occupational safety regulations, and the rising cost of skilled labor must be address in order to maintain long-term economic viability. Hatchery corporations develop their operating budgets by evaluating their permitted output, and developing a budget to meet that output, and maintain its infrastructure and personnel. Hatchery Corporations then negotiate a price-per-pound with a fish buyer, and carry out cost-recovery fishing adequate to meet their budgetary requirements for the year.

The mission of a Private Non-Profit Hatchery Corporation is to provide common property fish as an alternative to harvesting wild stocks, and so it is





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in the interest of each hatchery corporation to maintain their operations with as small a budget as possible, minimizing the number of fish the hatchery itself must catch and sell to continue operating.

This system works very well and has contributed to record wild salmon escapement and record salmon harvest throughout Southcentral Alaska for many enhanced stocks over the past half dozen years.

Alongside this successful program is the AHRP, which will ensure that our hatchery investment is used responsibly. Any adjustment to the hatchery system should be informed by the AHRP, and take into account the full operational needs of our hatcheries, and the fisheries they support.

Capping cost recovery by number of salmon harvested will only ensure that our hatcheries are run at a deficit, and require their managers to find alternate means of generating revenue when this is totally unnecessary. But the revenue would be generated and the permitted releases would occur regardless of any limitation on cost-recovery harvest. Hatcheries generally only harvest a small portion of their output for cost recovery now, as it is in their interest to leave as much common property fish in the water as possible.

The proposer's desired outcome is limiting hatchery production, the RPT process is the already available and meant to accommodate this very reasonable wish to participate in hatchery output decision making. Proposal 22 would not reduce hatchery output, but would likely drive hatchery budgets further upward, cause Private, Non-Profit Hatchery Corporation leaders to spend increasing time and energy outside of fish production raising revenue. The resulting reduced efficiency, increased cost, and overall hampering of the industry would not achieve the desired goal, so Proposal 22 must be rejected.



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**Proposal 23: Oppose.** This proposal indicates an arbitrary permit process for Tutka Bay Lagoon Hatchery's output and this process is not at all arbitrary, it is the product of an open, public review process, as required. That same process is available if output must be modified.

The justification given for the need to modify a hatchery's output outside the manner prescribed by law is subjective at best, with no evidence being provided to justify the conclusions reached about ecosystem function. It is just as likely that returning salmon are a great food source for Dungeness crab, and released smolt provide supplemental feed for Chinook salmon.

Regardless, any modification to a hatchery's output must be done by the proper methods as prescribed by law, and the Board of Fish does not have the authority to modify this output.

**Proposal 24: Oppose.** The Tutka Bay Lagoon Hatchery relies upon its Special Harvest Area (SHA) for cost recovery fishing, which is critical to its operations. ADFG has authority to regulate fishing in the SHA, including closure. Elimination of the SHA is not necessary, will not provide the indicated benefits, and will preclude this hatchery from producing fish.

**Proposal 25: Oppose.** This proposal is unnecessary as the head of Tutka Bay is already protected by a 500yd exclusion zone that can only be opened by special order by ADFG. Additional blanket restrictions are unnecessary and will result in unharvested fish, and foregone economic opportunity.

Further, while seine nets can contact the ground, the proposer describes their use as a bottom trawl. This gear can be damaged by being used in this manner, and these nets can cost up to \$100,000. It is in a captain's interest to keep seine gear from being damaged, which means avoiding the bottom and other hazards.

**Proposal 26: Oppose.** This proposal is similar to 25 in that it is poorly justified, and if adopted would not provide any benefit, but would rather



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10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

cause foregone opportunity to harvest hatchery fish. ADFG holds the authority to close this area and proper management should not include blanket area closures based on subjective justification.

**Proposal 27: Oppose.** Proposal 27 is subjectively justified, with no evidence provided that Chinook are intercepted in this fishery, nor that pink compete with Chinook salmon when their interaction is just as likely one where Chinook prey upon pink salmon.

It is important that this SHA remain in regulation because this area can be used as a remote release site, and therefore would be an important area for cost-recovery in that case, and removal of the SHA would neither preclude Halibut Cove as a remote release site, nor preclude cost recovery there, but it would confuse users and law enforcement.



United States Department of the Interior  
Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

OSM 19087.GP

**NOV 07 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 (BOF) will deliberate 2019/2020 regulatory proposals that address Lower Cook Inlet finfish fisheries beginning December 10, 2019. The Office of Subsistence Management has reviewed the proposals the BOF will be considering at this meeting.

The Office of Subsistence Management (OSM) in cooperation with other Federal agencies, has reviewed these proposals and does not believe adoption of any of these proposals will have an adverse impact on Federal subsistence users and fisheries in the Lower Cook Inlet area. During the meeting, OSM may wish to comment on other agenda items that may impact the Federally qualified subsistence user.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the BOF 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  
Suzanne Worker, Acting Subsistence Policy Coordinator, Office of Subsistence Management  
Greg Risdahl, Fisheries Division Supervisor, Office of Subsistence Management  
Doug Vincent-Lang, Commissioner, 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  
Southcentral Subsistence Regional Advisory Council  
Interagency Staff Committee  
Administrative Record

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Angela Bowers. I engage in commercial, sport, and subsistence fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

**PROPOSAL 23:** The Board should oppose Proposal 23. The proponent provides no evidence that hatchery operations contaminate the lagoon as suggested in this proposal. Tutka Bay Lagoon Hatchery continues to successfully rear fry in the lagoon year after year.

**PROPOSAL 24:** The Board should oppose Proposal 24. Elimination of the Tutka Bay Lagoon Special Harvest Area (SHA) significantly reduces Cook Inlet Aquaculture Association's (CIAA) ability to provide for operational funds through the cost recovery process. Without Tutka Bay Hatchery, CIAA would not have the funding to produce pink salmon or release sockeye salmon at the facility, which are widely harvested in the region by all user groups.

**PROPOSAL 25:** The anadromous streams at the head of Tutka Bay are already protected by a 500-yard perimeter from the stream mouth as a no commercial fishing zone unless the Alaska Department of Fish and Game management decides otherwise. Adding additional closed waters to commercial fishing would have significant impact to the local fishery and would likely result in unharvested pink salmon. This would result in lost economic opportunity. Failure to provide sufficient opportunity to harvest the fish, due to reduced fishing area and/or reduced or eliminated SHA, would increase the likelihood that fish would stray. Minimizing straying requires harvesting the returns as they arrive in the terminal area. This proposal provides no evidence for their suppositions.



PROPOSAL 26: The Board should oppose Proposal 26. Similar to Proposal 25, the head of Tutka Bay streams are protected by a perimeter from the stream mouth as a no commercial fishing zone. Streams are listed in the anadromous catalog and therefore are protected by a no fishing radius. Additionally, ADF&G closes a good portion of the Bay when managing for wild stock escapement.

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Thank you for your consideration.

Sincerely,

Angela Bowers  
[fisheggenator@gmail.com](mailto:fisheggenator@gmail.com)  
Sitka, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Armando Alvarez. I engage in subsistence and public use fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

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The limiting of cost recovery (Proposal 22) to an arbitrary fixed number or percentage would limit the flexibility needed to sustain nonprofit hatcheries. It is the goal of all hatcheries to provide as many fish for common property harvest by sport, subsistence and commercial fisheries. Some have done better than others, but the Board should not be micro-managing these many differing businesses. The Board's role is most properly setting regulations to ensure the opportunity and access to common property fisheries.

Thank you for your consideration.

Sincerely,

Armando Alvarez  
[armanaalvarez@yahoo.com](mailto:armanaalvarez@yahoo.com)  
Cordova, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Brian Warmuth. I engage in commercial fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

**PROPOSAL 23:** The Board should oppose Proposal 23. The proponent provides no evidence that hatchery operations contaminate the lagoon as suggested in this proposal. Tutka Bay Lagoon Hatchery continues to successfully rear fry in the lagoon year after year.

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I have been involved in the commercial fishing industry in Alaska for over 40 years. In that time I have witnessed the evolution of the Alaskan hatchery associations. These associations and their production have become a very important part of the production of all the different stakeholders whether commercial, sport or charter. These associations are not cheap to run and are largely paid for by cost recovery operations. Without viable cost recovery programs all of these associations statewide will fail. That is why I am strongly opposed to Proposal 22.

Thank you for your consideration.

Sincerely,

Brian Warmuth

[corsairbrian@gmail.com](mailto:corsairbrian@gmail.com)

Ketchikan, Alaska & Craig, Alaska

## **COMMENTS ON HATCHERIES IN KACHEMAK BAY STATE PARK AND CRITICAL HABITAT AREA**

Submitted by Carol Harding

PO Box 2154

Homer Alaska 9603

*November 25, 2019*

### **I am in support of Proposal 23 & 24:**

**PROPOSAL 23: SUPPORT** - The Tutka Hatchery has exceeded its carrying capacity in Kachemak Bay State Park. This size of operation is beyond what the original capacity of 10,000,000 pink salmon agreed upon in park waters. 20,000,000 is twice the carrying capacity of this area and not within the means of CIAA to harvest. In past summers, excess fish that were not harvested by CIAA have flooded the ecosystem, suffocating surrounding streams. This is abuse of state park waters, so permit should be revoked or suspended, but no action has been taken to date.

**PROPOSAL 24: SUPPORT** - **Why is Kachemak Bay covered in Special Harvest Areas (SHA's) for hatchery activities?** The SHA in Tutka Bay is exclusive use, which is forbidden in state park waters. A permit is required for any commercial activity other than commercial fishing. Commercial hatchery operations are not commercial fishing, so a park permit should be required to ensure compliance with park law. ADFG needs to understand that park waters are not the same as public domain waters and respect this difference.



November 25, 2019

Reed Morisky, Chairman  
Alaska Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
Juneau, AK 99811

RE: Lower Cook Inlet Meeting Comments

Chairman Morisky and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) is a membership-driven non-profit organization that represents and advocates on behalf of the commercial fishing fleet who participate in fisheries in Prince William Sound, the Copper River, and the northern Gulf of Alaska. CDFU continues to support Alaska's salmon enhancement programs, and our organization has been a longstanding advocate for the economic benefits of hatchery production in Alaska. Though our primary focus is the commercial fishing industry, we would like to acknowledge the contribution of Alaska's hatchery programs to all user groups -- subsistence, sport, personal use, and commercial -- as well as the broader benefit to all Alaskan seafood consumers.

Hatchery production in Alaska is a thoroughly vetted process that undergoes review by Alaska Department of Fish and Game management biologists and Regional Planning Teams, with significant opportunity for public comment throughout the process.

As you deliberate on proposals 22 and 23, we respectfully urge you to consider the following comments:

#	Proposal	Position	Comments
22	Limit the number of each salmon species harvested in cost recovery fisheries. <i>Mike Frank</i>	Oppose	This proposal would have broad-reaching consequences for hatchery operators statewide and potentially limit their ability to operate and meet permitting requirements. There is no biological or management benefit to limit cost recovery fisheries, and it is not necessary to further regulate the ability of hatchery programs to self fund their activities. Additionally, placing these limitations on cost



			recovery would effectively override ADF&G authority for hatchery permitting, and is counter to legal guidance provided to the board. CDFU opposes this proposal.
23	Suspend, revoke, or alter the Tutka Bay hatchery permit to reduce capacity. <i>Jeffrey Lee</i>	Oppose	<p>The hatchery permit was issued under the authority of the commissioner, and has been through numerous reviews at both ADF&amp;G as well as through the RPT process. Further, there is no evidence supporting the proposer's claims that hatchery operations have contaminated the lagoon.</p> <p>ADF&amp;G staff comments submitted to the board reference that this proposal seeks action that lies beyond the scope of the board's authority. CDFU opposes this proposal.</p>

Thank you again for your time and consideration.

Sincerely,

Chelsea Haisman  
Executive Director

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Daniella May. I engage in sport fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

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Thank you for your consideration.

Sincerely,

Daniella May

[Daniella.n.ambrosino@gmail.com](mailto:Daniella.n.ambrosino@gmail.com)

Anchorage, Alaska



November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Jeff F. Berger. I engage in commercial, sport, public use, and subsistence fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

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The limiting of cost recovery (Proposal 22) to an arbitrary fixed number or percentage would limit the flexibility needed to sustain nonprofit hatcheries. It is the goal of all hatcheries to provide as many fish for common property harvest by sport, subsistence and commercial fisheries. Some have done better than others, but the Board should not be micro-managing these many differing businesses. The Board's role is most properly setting regulations to ensure the opportunity and access to common property fisheries.

The salmon hatchery programs of CIAA and PWSAC are vital to our economy and benefit ALL USER GROUPS. There is no concrete evidence at this time that supports the theory that hatchery production is harmful to wild stocks in any way.

Thank you for your consideration.

Sincerely,

Jeff F. Berger

[jeffb@eefoods.com](mailto:jeffb@eefoods.com)

Ninilchik, Homer, Seward, and Whittier, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Jordan Stover. I engage in commercial and sport fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

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Thank you for your consideration.

Sincerely,

Jordan Stover  
[acehunterstover@gmail.com](mailto:acehunterstover@gmail.com)  
Homer, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Mackenzie Smith. I engage in sport and public use fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

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PROPOSAL 26: The Board should oppose Proposal 26. Similar to Proposal 25, the head of Tutka Bay streams are protected by a perimeter from the stream mouth as a no commercial fishing zone. Streams are listed in the anadromous catalog and therefore are protected by a no fishing radius. Additionally, ADF&G closes a good portion of the Bay when managing for wild stock escapement.

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I would just like to add that, before I came here a little over 15 months ago, I had no idea of the impact hatcheries had on the entire world. It is mind blowing to see the trickledown effect of hatcheries impact and how big our role really is in the world, its truly mind blowing how awesome it is.

Thank you for your consideration.

Sincerely,

Mackenzie Smith

[Mackenzie.smith@pwsac.com](mailto:Mackenzie.smith@pwsac.com)

Unakwik Inlet & Cordova, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Mark Vinsel. I engage in sport fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

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The limiting of cost recovery (Proposal 22) to an arbitrary fixed number or percentage would limit the flexibility needed to sustain nonprofit hatcheries. It is the goal of all hatcheries to provide as many fish for common property harvest by sport, subsistence and commercial fisheries. Some have done better than others, but the Board should not be micro-managing these many differing businesses. The Board's role is most properly setting regulations to ensure the opportunity and access to common property fisheries.

Thank you for your consideration.

Sincerely,

Mark Vinsel  
[mv@markvinsel.com](mailto:mv@markvinsel.com)  
Juneau, Alaska



November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Melissa Curran. I engage in commercial fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

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Thank you for your consideration.

Sincerely,

Melissa Curran  
[mel@akgen.com](mailto:mel@akgen.com)  
Sitka, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Morgan Jones. I engage in commercial, sport, and public use fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

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Thank you for your consideration.

Sincerely,

Morgan Jones  
[capenilchik@gmail.com](mailto:capenilchik@gmail.com)  
Homer, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Paul Owecke. I engage in commercial and sport fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

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The current protections to habitat in the areas referred to in the preceding proposals are already adequate and the claims regarding adverse outcomes due to hatchery operations and cost recovery are not supported by verifiable evidence.

Thank you for your consideration.

Sincerely,

Paul Owecke  
[prowecke@gmail.com](mailto:prowecke@gmail.com)  
Whittier, Alaska

November 25, 2019

Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Members of the Board of Fisheries:

My name is Richard Corazza. I engage in commercial fisheries and rely upon sustainable hatchery production in Alaska. Thank you for lending your consideration to this public comment submitted to the Lower Cook Inlet Board of Fisheries meeting.

I am opposed to Proposals 22, 23, 24, 25, 26 and 27.

**PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.

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Thank you for your consideration.

Sincerely,

Richard Corazza  
[Richsonja1951@gmail.com](mailto:Richsonja1951@gmail.com)  
Homer, Alaska





## SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

### CONTACT INFORMATION

---

Name: Raymond May

E-mail: Raymond.may@CCI.Net

Which community or ports do you live in or fish?

Kodiak

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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*NOTICE: I recognize that this public comment will be submitted electronically to the Board of Fisheries on my behalf. Changes will not be made to this form. All public comments can be viewed online at the Board of Fisheries website following the comment deadline.*

  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Mike Melatos

E-mail: salmonspecialties@alaska.com

Which community or parts do you live in or fish?

Cordova AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: BRUCE SCHACTLER

E-mail: B.SCHACTLER@AKINET

Which community or ports do you live in or fish?

KODIAK

---

Which Alaska fisheries do you engage in? (circle all that apply)

- Commercial
- Sport
- Subsistence
- Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

BRUCE SCHAETER

Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: JAMES Lytle

E-mail: Riskybiz@comcast.net

Which community or ports do you live in or fish?

CORDOVA, AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



**PROPOSAL 23:** The Board should oppose Proposal 23. The proponent provides no evidence that hatchery operations contaminate the lagoon as suggested in this proposal. Tutka Bay Lagoon Hatchery continues to successfully rear fry in the lagoon year after year.

**PROPOSAL 24:** The Board should oppose Proposal 24. Elimination of the Tutka Bay Lagoon Special Harvest Area (SHA) significantly reduces CIAA's ability to provide for operational funds through the cost recovery process. Without Tutka Bay Hatchery, CIAA would not have the funding to produce pink salmon or release sockeye salmon at the facility, which are widely harvested in the region by all user groups.

**PROPOSAL 25:** The anadromous streams at the head of Tutka Bay are already protected by a 500-yard perimeter from the stream mouth as a no commercial fishing zone unless the Alaska Department of Fish and Game management decides otherwise. Adding additional closed waters to commercial fishing would have significant impact to the local fishery and would likely result in unharvested pink salmon. This would result in lost economic opportunity. Failure to provide sufficient opportunity to harvest the fish, due to reduced fishing area and/or reduced or eliminated SHA, would increase the likelihood that those fish would go uncaught altogether and therefore increase the likelihood that fish would stray. Minimizing straying requires harvesting the returns as they arrive in the terminal area. This proposal provides no evidence for their suppositions.

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Printed Name

JAMES L Lytle

November 22, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: ERIK VELSKO

E-mail: dangerouscapefisheries@gmail.com

Which community or ports do you live in or fish?

Homeless AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

ERIK VELSKO

Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: CHRISTOPHER L DURNIL

E-mail: kdurnil@pacseafood.com

Which community or ports do you live in or fish?

SEWARD ALASKA

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Subsistence

Sport

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

CHRISTOPHER L. DURNIC  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
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## CONTACT INFORMATION

---

Name: Doug Carroll

E-mail: drc@gkcarroll.net

Which community or ports do you live in or fish?

Cordova

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: ZACHARY CARSON

E-mail: Zachary.Carson@igluat.com

Which community or parts do you live in or fish?

Bechevikon, AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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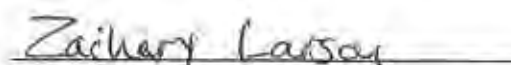
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Signature  
November 22<sup>nd</sup>, 2019

  
Printed Name





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Sean Dwyer

E-mail: Sean.Dwyer7@gmail.com

Which community or ports do you live in or fish?

Ketchikan AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: TIM SWOBODA

E-mail: TIMSWOBODA@AOL.COM

Which community or ports do you live in or fish?

CORDOVA, AK.

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

TIM SWOBODA

Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: CODY BROWN

E-mail: alaskienbay@gmail.com

Which community or ports do you live in or fish?

PRINCE WILLIAM SOUND

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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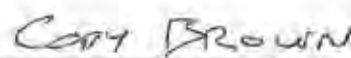
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Signature

  
\_\_\_\_\_  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Casey Campbell

E-mail: Caseyalk@gmail.com

Which community or ports do you live in or fish?

Anchorage

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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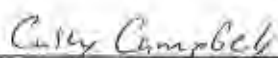
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November 22, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: MATTHEW MOIR

E-mail: mattmoir@npsi.us

Which community or parts do you live in or fish?

KODIAK

Which Alaska fisheries do you engage in? (circle all that apply)

<input checked="" type="checkbox"/> Commercial	<input type="checkbox"/> Sport
<input checked="" type="checkbox"/> Subsistence	<input type="checkbox"/> Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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MATTHEW MOIR

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name:

Patricia Kallander

E-mail:

patricia.kallander26@gmail.com

Which community or ports do you live in or fish?

Cordova

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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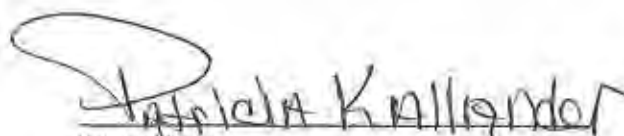
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Signature



Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Stacy Sundborg

E-mail: stacyjustice@hotmail.com

Which community or ports do you live in or fish?

Unalaska, Cordova

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
Subsistence

Sport  
Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

Printed Name

Stacy Sandburg

November 21, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
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## CONTACT INFORMATION

---

Name: PETE FERNANDEZ

E-mail: PDEFERNANDEZ@GMAIL.COM

Which community or ports do you live in or fish?

VALDEZ

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
Subsistence

Sport  
Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature  
November 24, 2019

  
Printed Name





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: BZANNON FINNEY

E-mail: BZANNONFINNEY@YAHOO.COM

Which community or ports do you live in or fish?

S.E. ALASKA

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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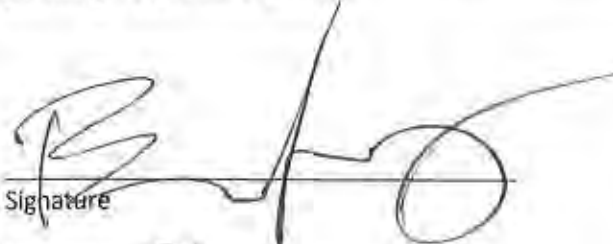
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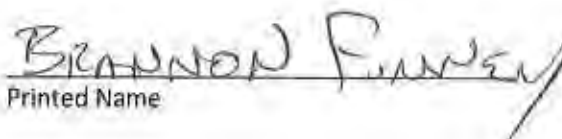
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Printed Name

November 21, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Armin Reimnitz

E-mail: areimnitz@msn.com

Which community or ports do you live in or fish?

Prince William Sound - Redoubt

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

Printed Name

November 21, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Travis Knox Leland

E-mail: Travis.knox@leland@live.com

Which community or ports do you live in or fish?

Bristol Bay

---

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



**PROPOSAL 23:** The Board should oppose Proposal 23. The proponent provides no evidence that hatchery operations contaminate the lagoon as suggested in this proposal. Tutka Bay Lagoon Hatchery continues to successfully rear fry in the lagoon year after year.

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**PROPOSAL 25:** The anadromous streams at the head of Tutka Bay are already protected by a 500-yard perimeter from the stream mouth as a no commercial fishing zone unless the Alaska Department of Fish and Game management decides otherwise. Adding additional closed waters to commercial fishing would have significant impact to the local fishery and would likely result in unharvested pink salmon. This would result in lost economic opportunity. Failure to provide sufficient opportunity to harvest the fish, due to reduced fishing area and/or reduced or eliminated SHA, would increase the likelihood that those fish would go uncaught altogether and therefore increase the likelihood that fish would stray. Minimizing straying requires harvesting the returns as they arrive in the terminal area. This proposal provides no evidence for their suppositions.

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Signature  
November 21, 2019

  
Printed Name



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Aaron Berger

E-mail: nberger86@gmail.com

Which community or ports do you live in or fish?

Homer, Kenai

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Printed Name

November 22, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name:

Eric Jordan

E-mail:

chumtroller@gmail.com

Which community or ports do you live in or fish?

S. HCA

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

November 21, 2019

Printed Name

Eric W. Jordan



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Kate Consenstein

E-mail: kate@risingtidealaska.com

Which community or ports do you live in or fish?

Kodiak

---

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

Kate Cowenstein  
\_\_\_\_\_  
Printed Name

November 20, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: MATT ABASSIE

E-mail: matt@risingtidealaska.com

Which community or ports do you live in or fish?

Bristol Bay

Which Alaska fisheries do you engage in? (circle all that apply)

- |  |                                     |
|--|-------------------------------------|
| <input checked="" type="checkbox"/> Commercial | <input type="checkbox"/> Sport      |
| <input type="checkbox"/> Subsistence           | <input type="checkbox"/> Public Use |

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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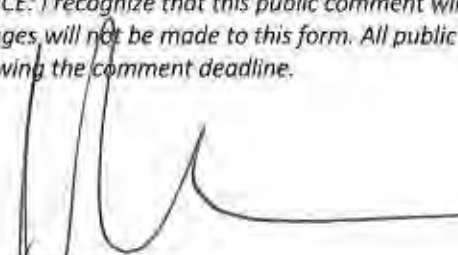
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Signature

  
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Printed Name

November 23, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Vince O'Shea

E-mail: DSHBALJU@GMAIL.COM

Which community or ports do you live in or fish?

Tuneau

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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November 22, 2019





## SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

### CONTACT INFORMATION

Name: Mike Buttery

E-mail: mbuttery@gmail.com

Which community or ports do you live in or fish?

Dutch Harbor

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

M. U. Butteray

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November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: A. BEHARY

E-mail: BEHARY@APTALASKA.NET

Which community or ports do you live in or fish?

---

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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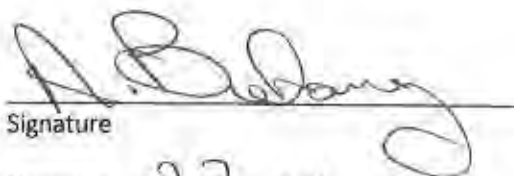
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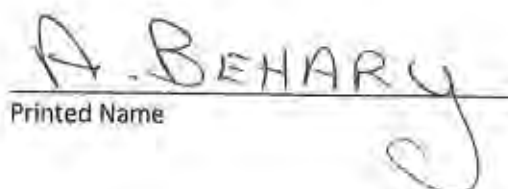
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Signature

  
Printed Name

November 22 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Christian Dixon

E-mail: cdixon@christian@gmail.com

Which community or ports do you live in or fish?

South east Alaska Fisherman's terminal Seattle

Which Alaska fisheries do you engage in? (circle all that apply)

- |  |                                     |
|--|-------------------------------------|
| <input checked="" type="checkbox"/> Commercial | <input type="checkbox"/> Sport      |
| <input type="checkbox"/> Subsistence           | <input type="checkbox"/> Public Use |

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

Printed Name

Christy Dixon

November 23 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Sam Marchant

E-mail: SamMarchant92@gmail

Which community or ports do you live in or fish?

Cordova

---

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

Sam Marchant

Printed Name

November 21, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Ron Kavanaugh

E-mail: sylster@acsalaska.net

Which community or ports do you live in or fish?

Kodiak

Which Alaska fisheries do you engage in? (circle all that apply)

- Commercial
- Sport
- Subsistence
- Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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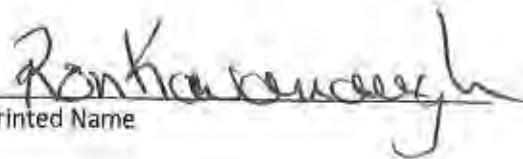
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Signature

  
\_\_\_\_\_  
Printed Name

November 23<sup>rd</sup>, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: CARRIE HOOFNAGLE

E-mail: CARRIE.H@ICICLESEANFOODS.COM

Which community or ports do you live in or fish?

KODIAK

Which Alaska fisheries do you engage in? (circle all that apply)

- Commercial
- Subsistence
- Sport
- Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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\_\_\_\_\_  
Signature

CARRIE HOFNAGLE  
\_\_\_\_\_  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Hillary Whitehorn

E-mail: hillarywhitehorn@gmail.com

Which community or ports do you live in or fish?

Petersburg

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

all business owner

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Duke MAROLF

E-mail: Duke @ catalyst - MARINE . COM

Which community or ports do you live in or fish?

Seward / PWS

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Subsistence

Sport

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

Duke MAROLF

Printed Name

November 22, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Angela Annstensen

E-mail: angiec@silverbayseafoods.com

Which community or ports do you live in or fish?

Petersburg, Sitka

Which Alaska fisheries do you engage in? (circle all that apply)

<input checked="" type="checkbox"/> Commercial	<input type="checkbox"/> Sport
<input type="checkbox"/> Subsistence	<input type="checkbox"/> Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

  
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November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

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Name: Grant Reed

E-mail: GRANT@PSAFAISH.NET

Which community or ports do you live in or fish?

STATEWIDE

---

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence  
 Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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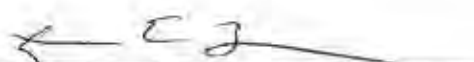
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**PROPOSAL 25:** The anadromous streams at the head of Tutka Bay are already protected by a 500-yard perimeter from the stream mouth as a no commercial fishing zone unless the Alaska Department of Fish and Game management decides otherwise. Adding additional closed waters to commercial fishing would have significant impact to the local fishery and would likely result in unharvested pink salmon. This would result in lost economic opportunity. Failure to provide sufficient opportunity to harvest the fish, due to reduced fishing area and/or reduced or eliminated SHA, would increase the likelihood that those fish would go uncaught altogether and therefore increase the likelihood that fish would stray. Minimizing straying requires harvesting the returns as they arrive in the terminal area. This proposal provides no evidence for their suppositions.

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Signature

  
Printed Name

November 22, 2019



## SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

### CONTACT INFORMATION

---

Name: Renee Alward

E-mail: reneec@fortunesea.net

Which community or ports do you live in or fish?

Homer, Kodiak

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

*renee alward*

Printed Name

November 21, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Sandy Sauter

E-mail: Sandy.Sauter@silvertonfoods.com

Which community or ports do you live in or fish?

SE, Valdez

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

Sandy Sauter

Printed Name

November 22, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Joe Lindholm

E-mail: crabberjoe@icloud.com

Which community or ports do you live in or fish?

Larsen Bay, Kodiak AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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Signature

Printed Name

November 19, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Vicki Sue Kutter

E-mail: MartysueKutter@outlook.com

Which community or ports do you live in or fish?

Kodiak, Prince William Sound, Bristol Bay

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

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Name: Tyson Fick

E-mail: tysonfick@gmail.com

Which community or ports do you live in or fish?

Seward, AK

---

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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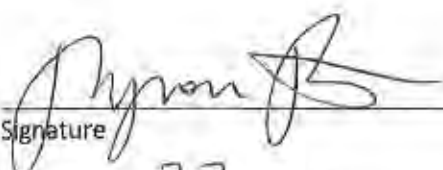
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November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Roger Stiles

E-mail: ROGERS@MARINEFISHINGINT.COM

Which community or ports do you live in or fish?

WATTIER

Which Alaska fisheries do you engage in? (circle all that apply)

- |  |                                     |
|--|-------------------------------------|
| <input checked="" type="checkbox"/> Commercial | <input type="checkbox"/> Sport      |
| <input type="checkbox"/> Subsistence           | <input type="checkbox"/> Public Use |

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

  
Printed Name

November 20, 2019





# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

Name: Sylvia Lange

E-mail: SylviaRL@me.com

Which community or ports do you live in or fish?

Cordova

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial  
 Subsistence

Sport  
 Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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Signature

  
Printed Name

November 22, 2019



# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Timothy Moore

E-mail: seascapewe@gmail.com

Which community or ports do you live in or fish?

live in Homer - fish in P.W.S.

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



**PROPOSAL 23:** The Board should oppose Proposal 23. The proponent provides no evidence that hatchery operations contaminate the lagoon as suggested in this proposal. Tutka Bay Lagoon Hatchery continues to successfully rear fry in the lagoon year after year.

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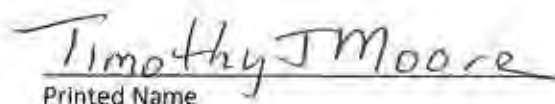
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# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

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## CONTACT INFORMATION

Name: Markus Kuller

E-mail: Cape Kasiluk @ Petrus.com

Which community or ports do you live in or fish?

Larsen Bay AK

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

The form below will be submitted to the Board of Fisheries electronically  
before the November 25 comment deadline.

## CONTACT INFORMATION

---

Name: Fernando Vasquez

E-mail: FernandoPerezVasquez@hotmail.com

Which community or parts do you live in or fish?

Southeast Alaska / Fishermans Terminals

Which Alaska fisheries do you engage in? (circle all that apply)

- |  |                                     |
|--|-------------------------------------|
| <input checked="" type="checkbox"/> Commercial | <input type="checkbox"/> Sport      |
| <input type="checkbox"/> Subsistence           | <input type="checkbox"/> Public Use |

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

**OPPOSE PROPOSAL 22:** The Board should oppose Proposal 22. Proposal 22 will change the entire dynamic of funding for non-profit salmon hatcheries in Alaska statewide. Cost recovery is the primary means of funding for an organization. As hatchery projects mature the need for cost recovery will diminish while common property contributions are targeted at the 50% to 70% range.



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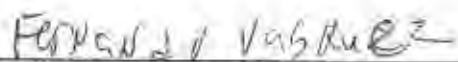
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# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

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## CONTACT INFORMATION

---

Name: Wendy Tweller

E-mail: wtweller@icloud.com

Which community or ports do you live in or fish?

Whittier, Prince William Sound / Cook Inlet

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

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## CONTACT INFORMATION

Name: Ivan Storonov

E-mail: ivan.storonov@hotmail.com

Which community or ports do you live in or fish?

Homer PWS

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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*Commissem should have the authority  
and not the Board of Fish*



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# SALMON HATCHERIES FOR ALASKA

LOWER COOK INLET BOARD OF FISHERIES PUBLIC COMMENT PROCESS

HATCHERY & AQUACULTURE RELATED PROPOSALS | LOWER COOK INLET MEETING

SEWARD, ALASKA | DECEMBER 10-13, 2019

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## CONTACT INFORMATION

Name:

Amy Stovarov

E-mail:

amy.stovarov@gmail.com

Which community or ports do you live in or fish?

PWS

Which Alaska fisheries do you engage in? (circle all that apply)

Commercial

Sport

Subsistence

Public Use

Do you rely upon or benefit from sustainable hatchery production in Alaska (circle one)?

Yes

No

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P.O. Box 714  
Ward Cove, AK 99928  
(907) 220-7630  
[info@seiners.net](mailto:info@seiners.net) [www.seiners.net](http://www.seiners.net)

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

**RE: Opposition to Proposals 22 through 27**

Chairman Morisky, Members of the Alaska Board of Fisheries,

Southeast Alaska Seiners Association (SEAS) represents over 100 permit holders in SE Alaska. Although these proposals are outside our fishing area, the nature of many proposals attack the very foundation of the aquaculture association programs that the commercial fishermen have built over the past 40 years, and the State of Alaska has sanctioned. The precedent they could set and then be applied to SE would be economically devastating, not only to our fisheries, but also the coastal communities where these activities occur. I trust you have all seen the numerous McDowell studies that demonstrate the significant financial impact each Regional Association has on their particular community and more. I implore the BOF to let the statutory and regulatory process that has worked for the last 40+ years continue to be the venue for any worthy concerns to be addressed, not the BOF process.

**Proposal 22- Oppose**

The author does not understand the checks and balances that are in place through Statute, and the RPT process for Regional Associations, and oversight for non-regional hatcheries through the Regional Associations concerning cost recovery activities. In no way can the BOF process be responsive to year-to-year cost recovery needs of individual associations nor should they venture into this realm. Loans from the revolving loan fund are issued on the expectation of the value of fish in the water. If the BOF or any other entity could dictate restriction on harvest after the fact, how could they ever approve any future loans through this program? This proposal doesn't merit the Boards' valuable time.

**Proposals 23, 24, 25, 26, and 27 - Oppose**

The State of Alaska already possesses the ability to revoke or suspend a hatchery permit for non-compliance, and no permits are issued **arbitrarily**. I would encourage the BOF to recommend the proponents of all these proposals to work through the existing permitting and RPT process to address

their concerns. Local Area Management Biologists have the responsibility and authority to perform most of these activities. Much of Alaska's successful fishery management is due to the authority local managers, with local knowledge, experience, and expertise have to make these decisions in season. These proposals are not additive to current fisheries management practices, and in fact, hamstringing the Department to fulfill their statutory obligations. As demonstrated in Proposal 28 submitted by ADF&G, when the Department sees a need to conduct their statutory obligations either more efficiently, or make changes to comply with statute or regulation in SHA's, they will be the first to approach the BOF asking you to do that based on sound science, free of allocative biases.

SEAS is very appreciative of the BOF process where all sides have the ability to share their perspective and concerns in an open and inclusive process. Thank you for your time and consideration of our concerns.

Sincerely,



Susan Doherty  
Executive Director SEAS



## RE: Comment on other topics

To: Pacific Halibut Commission I am writing to inform you that Alaska NOAA law enforcement falsified their 2019 report to the Pacific Halibut Commission. My boat is pictured in the report with a false claim. I have 37 years of Federal Service in natural resource management and 2 years as a Vietnam era vet. I have supervised hundreds of employees including law enforcement. I have been a hunter and fisher for 60 years. I have never been cited for any violation of the law. Last year I set my halibut skate once and caught 1 halibut. I took the halibut to a City of Sitka dock in my 20 foot fishing skiff and processed the fish on the dock. I walked down the dock to my 40 foot live aboard and put the fish in my 5 cubic foot freezer. The next day or so I went trolling for salmon in my fishing skiff and caught 2 chicken halibut. We ate most of one for dinner and put the other in the freezer on our live aboard. My wife, granddaughter, and I lived on the boat 8 months last year. We have an off-the-grid home on an island near downtown Sitka. We live on the island as much as we can. We are raising one of our grand children and getting her to school from the island in the fall/winter is difficult so we live on our boat during most of the school year. In the summer we explore southeast. We have one freezer and it's on our live aboard. We don't fish for halibut from our live-aboard. NOAA law enforcement from Ketchikan cited me for possessing sport caught halibut and a subsistence halibut in my freezer on our live aboard. I paid the \$200 fine just to get this behind me. After seeing my boat in their report with a false statement, I now regret paying the ticket. This was like rubbing salt in an old wound. I would like to know how I can legally possess subsistence and sport halibut. NOAA has not been able to answer this question. There are many Alaskans that live on their boats either part or full time. It appears that the current regulations do not allow Alaskans that live on their boats to participate in the subsistence fishery. Thank you for the good work you do to protect Alaskan resources! Sincerely, Jon R. Martin, Sr. Sitka, AK cc: Jonathon Kreiss Thompkins, Alaska House Representative NOAA Law Enforcement Alaska Division Alaska State Troopers Alaska Board of Fisheries ADFG Sitka Fish and Game Advisory Board Alaska Commissioner of Fisheries

# Non-Comment Responses

*Non-Comment responses are respondents who selected the "Support" or "Oppose" button but did not leave a written comment through the ADF&G comments site.*

Proposal	Position	Name
17	Support	Chris Perry
22	Oppose	Daniel Farren
24	Support	Kevin Walker
33	Oppose	Daniel Farren