

November 29, 2021

Chairwomen Märit Carlson-Van Dort  
Alaska Board of Fisheries

**Michael Bowen - Comments on 2021 Prince William Sound Finfish Meeting**  
**Proposal 43 – Support**

The PWS drift fleet has been waiting for a fair enhanced salmon allocation plan for 31 years and after three attempts we are still not there. Some people will say that the current plan is working and do not make any changes to it. If the drift gillnet fishery was receiving an average extra 18 million in enhanced salmon value each year that is outside the shared allocation plan I would agree with that statement.

The allocation plan adopted by the BOF in 1990 captured the value of all salmon, enhanced and wild. To address short falls in allocation the plan was to increase production for the gear group the was falling behind. It did not allow for any reallocation of existing production. This plan was doomed to fail. The drift feet was not in support of this plan while the seine fleet was. The 1990s was a tough time to be in the salmon industry. Between the 1989 oil spill and the growth in farmed salmon it took its toll. What ended up happening was the drift fleet worked on improving the quality and marketing of mostly the Copper River wild stocks while the seine fleet experienced weak markets, low prices and sometimes weak returns along with reduced participation. The end result was that PWSAC was under constant pressure by the seine fleet to increase production and the BOF was asked to reallocate existing production. In the end it was PWSAC that violated the plan by taking Esther chums produced for the drift fleet to Port Chalmers where the seine fleet has access to them. As you can imagine this did not sit well with the drift fleet after waiting for our promised production only to have it taken in violation of the allocation plan.

Some people will say that the current plan was agreed upon by all user groups. Then why did CDFU gillnet division have to spend over \$175,000.00 to sue the Dept and the BOF in 2006 when it was revealed that the value of the Gulkana enhanced red salmon harvest was being over inflated by including the value of the wild early returns to the Copper River. These over inflated Gulkana enhanced red salmon values were then multiplied 5 times in order to achieve the 5-year rolling average. The BOF and the Dept refused to address this unforeseen punitive error in regulation until all parties finally settled out of court.

Some at the Dept would say that by “Adding this value to the purse seine allocation would increase the likelihood of allocation imbalance” when there clearly is now an allocation imbalance.

Leaving VFDA enhance salmon out of the current plan results in the PWS seine fleet harvesting over 70% of the total value of the enhanced salmon resource in Area E on average annually. Under the current plan If they were to drop to 45 percent or less of PWSAC enhanced salmon

value, the following year they would have exclusive access to all the surplus enhanced chums. It could put their total enhanced salmon value at over 85 percent. Leaving the drift gillnet fleet the Main Bay red salmon return to be shared with the set net fleet and the now small failing Gulkana enhanced red salmon return.

The current allocation plan really has not much to offer the drift fleet as far as a safety net when compared to the safety net afforded the seine fleet.

With the current plan there is a lot of value that is not being counted or captured. Such as disaster relief funds and tariff funds paid to the fleets.

Under the 2 percent PWSAC enhancement tax collected on all commercially caught salmon in Area E the funds are given to PWSAC. These tax funds are split between the seine and drift based on each of their contributions. PWSAC takes those funds and reduces the budget cost for the seine and drift based on their contributions. So, the enhancement tax derived from the VFDA salmon are used at PWSAC to reduce the seine budget which allows them even more PWSAC produced salmon. Pretty sweet deal.

The original plan adopted in 1990 called for the use of historic catch values prior to enhance salmon production, which was 50% drift gillnet, 49% seine and 1% set gillnet. This is the same rational that was adopted by the Southeast Alaska plan in 1994 except it was for all enhanced salmon only.

All the hatcheries in PWS and Southeast Alaska were built with State of Alaska or Federal public funds. All of these hatcheries are raising, rearing, releasing and returning salmon into the common property waters of Alaska. They should be treated as common property not a private ranch for one user group. VFDA recently completed a several year plan using funds from the state of Alaska to increase pink production that could widen the enhanced salmon gap even more.

In Southeast Alaska there are 17 hatcheries which consist of two regional hatchery associations, five private nonprofits corporations and two federal hatcheries. All of these hatcheries are included in the Southeast Alaska enhanced salmon allocation plan. Not one of these hatcheries has been excluded for the exclusive benefit of one commercial user group. It would never fly in Southeast Alaska and it should not fly here in PWS.

Adding VFDA's value to the allocation plan will not result in any major changes to what has and is going now in our fishery. Assigned fishing districts and allocation percentages would remain the same. Adding VFDA's value will make the current plan fair.

A lot has changed since 2005. PWSAC and VFDA has increased its pink production, the seine fleet now experiences better processing capacity, better pinks prices and better pink returns. While the drift fleet is seeing an increase in subsistence harvest pressure on their allocated Main Bay sockeye fishery.

Now is the time to include all enhanced salmon into the PWS management plan as a starting point. Then if a user group can justify a bigger percentage they can bring their case to the BOF and have an open and honest dialog on the merits of an increase share of the enhanced salmon produced in PWS.

Thank you for this opportunity to comment on these very important issues.